

**BEFORE THE ZONING COMMISSION
OF THE DISTRICT OF COLUMBIA**

Application of Gallaudet University

PRELIMINARY STATEMENT OF COMPLIANCE

**I.
NATURE OF RELIEF SOUGHT**

Pursuant to 11 DCMR Section 3104 and in accordance with 11 DCMR Section 210, Gallaudet University (hereinafter "Gallaudet") requests special exception review and approval of the Gallaudet University 2022 Campus Plan (the "Campus Plan"), and further processing under the Campus Plan as described below. The majority of the Gallaudet University campus is bounded generally by Florida Avenue, NE, to the south, West Virginia Avenue, NE, to the east, Mount Olivet Road, NE, and Corcoran Street, NE, to the north, and Brentwood Parkway and 5th and 6th Streets, NE, to the west. The entire Gallaudet campus includes Parcels 141/69, 129/70, 129/103, 129/106, 129/112, and Square 3591, Lot 4 (the "Campus").

Parcel 141/69 (4,054,186 sq. ft., or 93 acres, of land area) comprises the majority of the Campus, and is entirely located in the D/R-4 District. Also on the main portion of the Campus, on the east side of 6th Street, NE are Parcel 129/70 (45,440 sq. ft.) and Parcel 129/103 (61,500 sq. ft.) both of which are zoned C-M-1. Together, these three parcels comprise 95.5 acres. To the west, across 6th Street, are Parcels 129/106 (20,895 sq. ft.), and 129/112 (78,936 sq. ft.) and Square 3591, Lot 4 (66,743 sq. ft.) all of which are zoned C-M-1. Although a university use is

ZONING COMMISSION
District of Columbia
District of Columbia
CASE NO. 12-15
EXHIBIT NO. 11
CASE NO. 12-15
EXHIBIT NO. 11

permitted as a matter of right in the C-M-1 zone, and the Commission's review jurisdiction is limited to the 93-acre D/R-4 zoned portion of the Campus, the entire 99.35 acre Campus is included in the Gallaudet University 2022 Campus Plan to give the Commission a complete picture of what is proposed.

As reflected in prior Campus Plans, Gallaudet is unique among colleges and universities in the District in that there are both an elementary school and a high school on the Campus. The Clerc Center, located on the northern portion of the Campus, includes the Kendall Demonstration Elementary School (KDES) and the Model Secondary School for the Deaf (MSSD). The Clerc Center occupies about 30 acres of the 93-acre D/R-4 zoned portion of the Campus. Technically, any new construction for non-university private school uses does not require Campus Plan review by the Zoning Commission under Section 210, but is subject instead to review by the Board of Zoning Adjustment under Section 206 of the Zoning Regulations. The University is including the Clerc Center in the Campus Plan in order to give the Commission a full understanding of the future development on the Campus. The University requests that the Commission retain jurisdiction to review and approve the future development of the Clerc Center.

II.

INTRODUCTORY STATEMENT

Background

Gallaudet's original campus plan was approved by the Board of Zoning Adjustment ("BZA") in 1972 and revised in 1976. (BZA Orders No. 11093 and 12068, respectively). An updated campus plan was approved by the BZA in 1980. (BZA Order No. 13220). In 1992, by Order No. 15671, the BZA approved Gallaudet's University Master Plan, 1991-2000. The 2002-

2012 Campus Plan was approved by the Zoning Commission in Order No. 03-02, dated August 26, 2003.

Following the approval of the 2002-2012 Campus Plan, Gallaudet returned to the Commission for campus plan approval of the following projects:

- Order No. 06-16, dated June 15, 2006--Construction of Sorenson Language and Communication Center.
- Order No. 03-02A, dated March 8, 2010--Conversion of Denison House from administrative office to student residence use.
- Order No. 03-02B, dated March 18, 2011--Construction of Living/Learning Residence Hall 6 (LLRH6).

Although all of the new projects approved by the Commission under the 2002-2012 Campus Plan were not built, that Campus Plan called for approximately 183,578 net additional square feet of university buildings on the Campus, which included both demolition and new construction. The total amount of university space added to the Campus during that time was approximately 147,704 square feet, and the total amount of demolition on the Campus was 100,238 square feet. The proposed Campus Plan includes renovations of existing buildings for continued use or repurposed use, as well as demolitions where necessary, and new construction.

Summary of Proposed Campus Plan

The Gallaudet University 2022 Campus Plan sets forth in detail Gallaudet's desired plans for the next ten years. The proposed Campus Plan assumes a modest annual growth of the student population between 1.0% and 3.0% during that time. In summary, and as detailed further below in Section IV.C., over the course of the next decade, Gallaudet desires to undertake a variety of demolition, renovation and new construction projects, totaling a net increase of

approximately 206,000 square feet of new space for the university, and a net reduction of approximately 94,400 square feet on the Clerc Center.

Summary of Proposed Further Processing for Fay House and Ballard House

There are four buildings in the historic portion of the Campus, near the corner of 6th Street and Florida Avenue, NE, that are referred to collectively as Faculty Row. These were all built as residences in the mid-1800's. The largest is the President's house. The other three are smaller and were used until recently as administrative office space. In March of 2010, the Commission approved Application No. 03-02A for a minor amendment to the 2002 Campus Plan, and further processing, for one of those three buildings, Denison House. The approval authorized a change in the campus plan designation from administrative to residential use, and to renovate and convert the use from administrative office to student residence use, in order to create a living/learning community in the building. The Commission issued a Summary Order in that case.

The university proposes to convert the other two buildings, Fay House and Ballard House, to student residence use as well. Like Denison House, Fay and Ballard were designated as administrative use under the 2002 Campus Plan. This 2022 Campus Plan submission to the Zoning Commission designates those two buildings as residential use. As the first major project to come out of the Campus Plan, the renovations will restore these two houses to student housing, creating two new living/learning communities along Olmsted Green. These new communities will enhance the existing living/learning community that was created in adjacent Denison House in 2010. The projects will involve full interior renovation - finish replacement, new ceilings, new bathroom fixtures, new lighting and new MEP systems - as well as selected exterior aesthetic improvements. The two projects will begin the formation of a strong

residential presence on the west side of Olmsted Green, to be further complimented by the future student apartments along 6th Street.

Community Meeting Process and Dialogue

In 1975, Gallaudet formed the Gallaudet Community Relations Council ("GCRC"), consisting of several neighborhood representatives and a Gallaudet liaison. The purpose of the GCRC is to foster a positive relationship between Gallaudet and the neighboring community. Through the process of working with the GCRC over the last 37 years, Gallaudet has kept the community informed, and has received community input, about all elements of any planned expansion of the Campus, as well as other issues. On October 12, 2011, Gallaudet discussed the proposed Campus Plan with the GCRC. Since that time, GCRC members have been involved with the community meeting processes (as further described below), and have participated in dialogue with the university about the Campus Plan.

The Campus is located within the jurisdiction of Advisory Neighborhood Commission ("ANC") 5B and is located adjacent to ANC 6A and ANC 6C. The following is a list of presentations to the ANC's to date:

December 1, 2011	Introductory discussion with ANC5B
March 1, 2012	Presentation to ANC5B
March 14, 2012	Presentation to ANC6C
March 16, 2012	Presentation to ANC5B SMD06 at Gallaudet University
March 21, 2012	Presentation to ANC6A Economic Development and Zoning Committee
April 4, 2012	Presentation to ANC 6C Planning, Zoning, and Environment Committee

Gallaudet also held a series of four community outreach meetings in various parts of the community in the Spring of 2012, and obtained valuable community input which helped to inform the Campus Plan. Gallaudet held three community forums, at the Trinidad Recreation Center on Saturday morning, April 14; at The Atlas Performing Arts Center on Monday evening,

April 16; and at Gallaudet University Chapel Hall on Tuesday evening, April 17. Each of these forums provided the same information, and included an opportunity to explore specific topics with University representatives, and to engage in a dialogue about the Campus Plan. A Workshop was then held on Monday evening, April 30 at the Peikoff Alumni House on campus. The Workshop focused on major themes, synthesized the information obtained in the community forums, and provided a further opportunity for community members and university representatives to explore specific topics.

III. JURISDICTION OF THE COMMISSION

The Zoning Commission has jurisdiction pursuant to Sections 210 and 3104 of the Zoning Regulations to approve as a special exception a campus plan, and further processing under an approved plan, for a university located in a residential district.

Uses that are permitted by special exception are presumed to be appropriate for the applicable zoning district as long as certain conditions are satisfied. In considering special exception applications, the Commission's discretion is limited to determining whether the relevant conditions and special exception criteria have been met. If an applicant meets its burden, the Commission must ordinarily grant the application. First Baptist Church of Washington v. District of Columbia Board of Zoning Adjustment, 432 A.2d 965 (1981); Stewart v. District of Columbia Board of Zoning Adjustment, 305 A.2d 516, 518 (1978).

The District of Columbia Court of Appeals has also affirmed the Commission's jurisdiction and scope of review in campus plan cases and has made clear that in reaching its decision the Commission may take into consideration such factors as institutional necessity. Draude v. District of Columbia Board of Zoning Adjustment, 582 A.2d 949, 955 (1990).

IV.
GALLAUDET COMPLIES WITH THE
REQUIREMENTS OF SECTION 210

A. Gallaudet University Qualifies as an Academic Institution of Higher Learning (Subsection 210.1)

Gallaudet was formally established in 1856 as a small school for deaf and blind children. It was later incorporated as the Columbia Institution for the Instruction of the Deaf and Blind. Pursuant to Congressional approval, the college division was added in 1864. Gallaudet became the first, and was, for almost a century, the only institution of higher learning specifically designed to meet the needs of the deaf population. Gallaudet became a University in 1986 upon the passage of the Education of the Deaf Act. Gallaudet is fully accredited and authorized to confer degrees. The BZA and the Zoning Commission have found in prior approvals that Gallaudet qualifies as a University as defined in the Zoning Regulations.

B. The Use is Located So That it is Not Likely to Become Objectionable to Neighboring Property Because Of Noise, Traffic, Number Of Students, Or Other Objectionable Conditions (Subsection 210.2)

1. Noise

The Campus Plan is designed so as not to create objectionable conditions because of noise. The main portion of the Campus is spread across 95.5 acres, and has significant open space adjacent to its residential neighbors to the north, east and south. Within the Campus boundaries, university activities are designed to be located in such a manner as to satisfy Gallaudet's need for a tranquil and secure place for students to study, work and live. In its efforts to reduce ambient noise, Gallaudet has built into the Campus Plan a landscaped perimeter buffer to all adjacent residential areas, in addition to the preservation, maintenance and enhancement of

large open green space, including the Olmsted Green, the Gallaudet Mall, and several athletic fields.

The proposed conversion of Fay House and Ballard House to residential use will not result in any objectionable noise impacts.

2. Traffic and Parking

Gallaudet has created and maintained a pedestrian-oriented campus, with parking located along its periphery. Gallaudet makes extensive efforts to control automobile traffic on campus. Because of the large size of the Campus and the fact that it operates as a self-contained unit, visitors, faculty and staff park on campus rather than on the streets in the surrounding neighborhood.

At present, the Campus contains a total of 1,588 parking spaces, 1,381 primary on-campus parking spaces located within parking garages and surface lots, plus an additional 207 spaces located in an overflow parking lot located across 6th Street. Peak occupancy of the total parking supply has been determined to total only 67 percent of available spaces, whereas in 2002 peak occupancy measured 74 percent of then-existing supply. The 207 overflow parking spaces are used only four or five times a year, and are planned to be eliminated as part of future Campus Plan development. The University will maintain its primary on-campus parking supply of 1,381 spaces. Because the student population is projected to increase by up to 3% per year, the University will implement additional Transportation and Parking Demand Management measures to manage current and future parking demands within its current primary parking supply. The University currently operates an extensive shuttle service for students and faculty/staff, and has recently installed a Capital Bikeshare station on Campus, with space for 19 bikes, adjacent to the main entrance at 8th Street and Florida Avenue. The University will

examine additional measures to manage its existing parking supply and further encourage alternate modes of transportation in the future.

As part of the Campus Plan, Gallaudet has proposed an improved site access system to increase safe pedestrian connections to/from transit and the surrounding development neighborhood. The University has also proposed reopening the historic gate house at 7th Street and Florida Avenue to vehicle traffic in order to improve the initial campus experience for visitors and the University population with views of the Olmsted Green. The historic gate house is currently used as a pedestrian-only entrance. Gallaudet is confident that its traffic management program will not only continue to provide satisfactory service, but will actually enhance vehicular efficiency and safety, especially given: (1) the pedestrian-orientation of the Campus; (2) Gallaudet's projection of only 1.0% to 3.0% in annual student population growth over the next decade; (3) the improvements proposed for additional pedestrian access to the Campus; (4) the location of the NoMa Gallaudet Metrorail station a short distance away; and (5) the University's commitment to providing an improved Transportation and Parking Demand Management Plan to manage the existing supply and encourage alternative modes of transportation to the campus.

The proposed conversion of Fay House and Ballard House to residential use will not create any objectionable traffic or parking impacts.

3. Number of Students

The students at Gallaudet are deaf, hard of hearing, or are pursuing a professional career related to deafness. As such, future enrollment projections for Gallaudet can be calculated with greater precision than is possible at other universities catering to the hearing population. While the student population increased dramatically in the 1980s as direct result of the Rubella

epidemic of the early 1960s, Gallaudet has actually witnessed a slight decrease in student population since the 2002 campus plan was approved. This is due primarily to two factors – the stabilization in the numbers of the deaf population, and greater communication access for deaf and hard of hearing students, allowing for more opportunities to attend a wide variety of colleges and universities than in previous times.

At the time of the 2002 campus plan approval, Gallaudet maintained a total university student population of approximately 1,706 students (1492 FTE). The current student population has dropped to 1,611 students (1,442 FTE). Gallaudet projects that the total university student population in ten years will increase between approximately 1.0% and 3.0% per year.

Approximately 73% of university-level students at Gallaudet currently live in campus housing. Over the next ten years, Gallaudet intends to maintain the current percentage of available beds with respect to enrollment trends. Upon completion of the proposed residence hall renovations and new construction, the university will be able to house 1,634 students or approximately 73% of the maximum total projected student enrollment of 2,238.

The conversion of Fay House and Ballard House to residential use is included in these projections, and will have no objectionable impacts.

4. Other Objectionable Conditions

Gallaudet is aware of no other objectionable conditions associated with the Campus Plan or the further processing. Gallaudet has planned carefully for its needs consistent with the needs of the surrounding community. Over its 157-year history, Gallaudet has proven to be a good neighbor in the community.

C. The Campus Is Located Within The D/R-4 And C-M-1 Districts And All Development Under The Proposed Campus Plan, When Added To All Existing Buildings And Structures On the Campus, Does Not Exceed The Gross Floor Area

Prescribed For the R-5-B District. There Is No Unreasonable Campus Expansion Into Improved Low-Density Districts (Subsection 210.3).

For colleges and universities located in residential districts, the maximum bulk requirements normally applicable in those districts may be increased for specific buildings or structures, provided that the total bulk of all buildings and structures on the residentially-zoned portion of the campus shall not exceed the gross floor area prescribed for the R-5-B District, which is 1.8 FAR. The total density of all university buildings on the Campus is 1,974,984 sq. ft. or 0.46 FAR. Over the 10 year life of the Campus Plan, Gallaudet proposes to demolish approximately 270,778 square feet of existing university buildings and to construct approximately 476,804 square feet for new university use. If all the demolitions and new construction proposed in the Campus Plan are completed, the Campus' total building density attributable to university use would increase to 2,181,010 sq. ft. or 0.50 FAR¹. If only the D/R-4 portion of the Campus is considered, the existing university gross floor area is 1,942,937 sq. ft. (0.48 FAR) and the proposed university gross floor area will be 2,016,010 sq. ft. (0.50 FAR). Both existing and projected measurements are far below the 1.8 FAR permitted on the D/R-4 portion of the Campus by Subsection 210.3 of the Zoning Regulations.

This low density is in keeping with Gallaudet's interest in maintaining open space throughout the Campus. Furthermore, each new proposed building or use identified in the D/R-4 zoned portion of the Campus Plan will need to be reviewed individually by the Zoning Commission as further processing applications under the Campus Plan.

¹ These building density totals factor in the entire 99.35 acre Campus, and include only square footage attributable to university use. The current building square footage attributable to the Clerc Center, which includes the Kendall Demonstration Elementary School (KDES), and the Model Secondary School for the Deaf (MSSD), both of which are also located on the Campus, is 668,316 sq. ft. or 0.15 FAR. The proposed gross floor area for the Clerc Center under the Campus Plan will be reduced to 573,924 sq. ft., or 0.13 FAR. The existing combined building density for the University and the Clerc Center is approximately 2,643,300 sq. ft. or 0.61 FAR. If all of Gallaudet's initiatives for the next ten years for the university and the lower schools are realized, the total combined building density will be 2,754,934 sq. ft. or 0.64 FAR. This represents a total net increase of university and lower school density of only 111,634 sq. ft.

The conversion of FayHouse and Ballard House to residential use will have no impact on these calculations.

D. Submission Of A Plan For Developing The Campus As A Whole (Subsection 210.4)

The Gallaudet 2022 Campus Plan is a part of this application. That document outlines Gallaudet's plan for development of the Campus as a whole for the upcoming decade², and indicates the location, height and bulk of all existing and proposed improvements. The Campus Plan, as well as the documents submitted as part of this application, illustrate the following:

1. Buildings and parking and loading facilities.
2. Screening, signs, streets and public utility facilities.
3. Athletic and other recreational facilities.
4. A description of all activities conducted or to be conducted on the Campus, and of the capacity of all present and proposed campus development.

Gallaudet University is a Liberal Arts university primarily consisting of academic and student life activities. Current and future activities anticipated on the Campus include the following:

- Academics and research
- Residential (student residents, faculty-in-residence, Resident Advisors, etc.)
- Athletic and recreational activities
- Ancillary uses including:
 - The Laurent Clerc National Deaf Education Center, a pre-K to 12th grade school with residential students in grades 9-12

² Gallaudet anticipates filing a PUD and Map Amendment Application in the near future to include development on Parcels 129/103, 129/106 and Square 3591, Lot 4, on both sides of 6th Street, N.E., in the C-M-1 portion of the Campus. The project will include the Innovation Lab and Business Incubator, and the 6th Street Mixed-Use Student Apartments, both of which are described below, as well as a mixed-use building to be built on the west side of 6th Street, per the Florida Avenue Market Small Area Plan.

- Kellogg Conference Center
- Support Services including:
 - Transportation
 - Department of Public Safety
 - Audiology Clinic
 - Food Services
 - Facilities and Maintenance
 - Gallaudet Interpreting Service

The Campus Plan is designed to guide Gallaudet in its construction and renovation projects over the course of the next ten years. As detailed in the Campus Plan, Gallaudet proposes a three-phase plan of university expansion and renovation during this period, which is summarized below:

Phase I--Major Projects

1. Renovation of Ballard and Fay Houses

Ballard, Fay and Denison Houses were originally built in the Victorian style in the mid-1800's as faculty housing. More recently, they have been occupied for administrative office use. Similar to the recent renovation and repurposing of Denison House in 2010, Ballard and Fay Houses will be converted from administrative office space to student housing, to create two more living/learning communities along Olmsted Green. Further processing approval is requested in this application to allow that to occur.

2. Renovation of Dawes House

This academic building, built in 1880, will be totally renovated and upgraded for continued academic use.

3. New Residence Hall for the Model Secondary School for the Deaf (MSSD)

This new 144-student bed facility will also have 6 one-bedroom staff apartments. The existing girls' residence hall, Residence Hall B, will be demolished, and the boys' dorm, currently housed in Ballard North, will be returned to University use.

4. 6th Street Gateway/Olmsted Green/7th Street Entry

A new main pedestrian entry to the campus will be created at the corner of 6th Street and Florida Avenue, NE. A new vehicular entrance will be provided at 7th Street and Florida Avenue, NE, and the Olmsted Green will be restored.

Phase II--Major Projects

1. Visitor Center

The Visitors Center will be relocated to this new building, located adjacent to the new 6th Street Gateway.

2. Innovation Lab and Business Incubator

This new building will also be located adjacent to the new 6th Street Gateway.

3. 6th Street Mixed-Use Student Apartments

This new building will be located north of the new 6th Street Gateway and south of the existing 6th Street parking garage. The building will have ground floor retail with student apartments above.

4. Student Learning Commons

This new building will be located on the site of Edward Minor Gallaudet Hall (which will be removed), between College Hall and Peet Hall. This new building will serve as the terminus to the 6th Street Gateway.

Phase III-- Major Projects

1. New MSSD School Building

This new building will replace the existing outmoded MSSD building, which will be demolished.

2. Clerc Center Playing Fields

The new fields will be located at the north end of the campus, near the existing MSSD Gym.

3. Peet Hall Replacement

This existing residence hall will be replaced by a new 175-bed residence building modeled after the recently approved and constructed LLRH6 residence hall.

4. Academic Building

This new building will be located at the current site of the Ely Center, and will serve as the premier center for student learning and research.

5. Recreational Gym

This addition to the Field House will provide much-needed space for intramural sports and non-collegiate team athletes and students, and will provide opportunities for community use.

6. Student Center at Hall Memorial Building (HMB)

This building, originally built as the main academic building on campus, will be renovated to house the majority of the campus life programs. The retail dining facilities, the bookstore, the post office, the student center information desk as well as all meeting room space will be moved from the current Student Activity Center building to HMB.

7. Renovation of Kendall Hall

This academic building will be totally renovated for continued academic use.

8. Demolition of Merrill Learning Center

Once the new student center at HMB is completed, Merrill will be demolished to restore the site to green space as part of the Gallaudet Mall.

9. Renovation of SAC/SUB

Once the current Student Activity Center uses are moved to HMB, the renovation of the Student Union Building portion of the Student Academic Center will provide addition classroom space and academic departments.

10. Gallaudet Mall Renovation

In addition to the restoration of the site currently occupied by Merrill, the renovations to the Mall will include new walkways, lighting, landscaping, trees and outdoor furniture.

E. No Interim Use of Land is Proposed (Subsection 210.5)

No specific interim uses are requested as part of this application nor are there any currently contemplated.

F. No New Use Sought for Approved Site of Building Proposed to be Moved Off-Campus (Subsection 210.6)

Under the Zoning Regulations, a Campus Plan amendment is required when a proposed new building, approved under a Campus Plan but not yet built, is relocated outside the Campus Plan boundaries and a new use is proposed for the original approved site. Gallaudet does not seek approval for any new use of a previously approved building site, and thus complies with this subsection.

G. Compliance with the Policies of the District Elements of the Comprehensive Plan (Subsection 210.7)

Gallaudet University's 2022 Campus Plan, and further processing request, take into account all of the applicable goals and aspirations set forth in the Comprehensive Plan. The

Comprehensive Plan Future Land Use Map shows the main portion of the Campus, east of 6th Street, NE, including all of the portion of the Campus that is zoned D/R-4, as being in the Institutional Land Use category. The Comprehensive Plan Generalized Policy Map shows all of the Campus, on both sides of 6th Street, NE, as being in the Institutional Uses category.

There are a number of provisions in the Comprehensive Plan which support, and are reflected in, Gallaudet's 2022 Campus Plan application. The major themes, which are also mentioned elsewhere throughout the Comprehensive Plan, are as follows:

- Page 2-25--Framework Element--Increasing Access to Education and Employment: Guiding Principles, para. 20--This paragraph stresses the importance of colleges and universities to the District in a number of ways.
- Pages 3-41 through 3-44--Land Use Element--Institutional Uses--These pages outline the importance of colleges and universities to the District through employment and spending power, as well as in providing a range of services that the District could not provide on its own. This section also indicates the importance of proper controls on the external effects of colleges and universities, particularly upon surrounding residential areas.
- Pages 12-18 through 12-23--Educational Facilities Element--These pages highlight the promotion of educational partnerships between universities and elementary and secondary schools; promotion of good "corporate citizenship"; attention to potential neighborhood impacts; provision of more on-campus housing; and mitigation of traffic impacts.

Gallaudet University is also featured prominently in the Upper Northeast Area Element of the Comprehensive Plan, and is described on page 24-3 as "the nation's premier college for the

deaf and hearing-impaired." The Gallaudet Historic District, on the grounds of the Campus, is described as an important historic resource.

H. Certification: The Proposed Buildings are Within the Floor Area Ratio Limit for the Campus as a Whole (Subsection 210.8)

As set forth in the Campus Plan, if all planned construction and demolition takes place over the course of the next 10 years as proposed in the Campus Plan, the total FAR for university use on the Campus will be 0.50 FAR. The further processing approval for Fay House and Ballard House will have no impact on that calculation.

I. Referral to the District of Columbia Office of Planning and the District Department of Transportation (Subsection 210.9)

This Campus Plan application is being sent to the Office of Planning and the District Department of Transportation ("DDOT") for their review and report. Representatives of Gallaudet met with Office of Planning staff on May 30, 2012 to discuss this application. Representatives of Gallaudet also met DDOT staff on August 20, 2012 to discuss the application. Further meetings are anticipated as this application moves forward.

**V.
GALLAUDET COMPLIES WITH REQUIREMENTS
OF SECTION 3104 OF THE ZONING REGULATIONS**

Under Section 3104.1, the Zoning Commission is authorized to grant those campus plan and further processing special exceptions which, in the judgment of the Commission, will be in harmony with the general purpose and intent of the Zoning Regulations and Maps and will not tend to affect adversely the use of neighboring property.

1. Harmony with the Zoning Regulations and Maps

This campus plan and further processing application is in harmony with the Zoning Regulations and Maps. The Campus is zoned D/R-4 and C-M-1, and university use is permitted

in the D/R-4 Zone by special exception and in the C-M-1 Zone as a matter of right. The Campus has been occupied by Gallaudet for nearly 160 years. No change in use is being requested.

2. No Adverse Effect on Neighboring Property

The proposed renovations and new construction planned for the next 10 years will not adversely impact neighboring property. Gallaudet anticipates a modest increase in enrollment and only a very minimal increase in university building density.

**VI.
CONCLUSION**

For the reasons set forth above, it is respectfully submitted that Gallaudet is entitled to the requested special exception relief and that the relief may be granted in accordance with the requirements of the Zoning Regulations.

#11395762_v4