★ ★ ★

Foggy Bottom and West End
Advisory Neighborhood Commission (ANC-2A)

c/o St. Mary's Court 725 24th Street, NW Washington, DC 20037 (202) 736-1775

DISTRICT OF COLUMBIA
2000 SEP -8 P 3:52

September 8, 2000

Ms. Sheila Cross-Reid, Chair
Board of Zoning Adjustment
441 Fourth Street, NW, Room 210
Washington, DC 20037

Re: BZA Application 16553--George Washington University Proposed Foggy Bottom Campus Plan - Years 2000-2010

Dear Madam Chair:

This letter sets forth that ANC-2A has been and is complying with Title 11 DCMR 3115.5 and files this summary in response to these requirements.

ANC-2A held a Special Meeting on Wednesday, August 30, 2000, that was duly noticed, with a required quorum of four of the Commission's six members present. The purpose of the Special Meeting was to review and confirm the Commission's positions on the issues and concerns covered in the previously filed Resolutions on the above Application. These letters and Resolutions are as follows:

(1) ANC-2A letter in lieu of a resolution, filed February 17, 2000, BZA Case #16553, Exhibit #25, setting forth the reasons for the Commission's request that the Campus Plan as filed be returned because it failed to address the University's expansion beyond the approved campus boundaries in direct violation of 11 DCMR 210.2 and 10 DCMR 1104.1, making a mockery of the Campus Plan process (copy attached).

(2) ANC-2A letter dated April 12, filed April 13, 2000, BZA Case #16553, Exhibit #98, notifying the BZA and the Applicant that James T. Draude, Esquire is authorized to bind ANC-2A in the above case (copy attached).

(3) ANC-2A Resolution 00-4E, filed April 18, 2000, BZA Case #16553, Exhibit #111, covering the Commission's request to change the date of the opposition's hearing from April 26 to May 24, 2000, in order to have adequate time to respond to the filing on April 12 by GWU of a revised Campus Plan and a revised Traffic and Parking Study, a total of 346 pages (copy attached). Hearings were rescheduled.

(4) ANC-2A Resolution 00-4C, filed April 19, 2000, BZA Case #16553, Exhibit #113, declaring GWU's Campus Plan unacceptable and asking that student enrollment be curtailed until adequate on-campus housing, parking and other facilities are made available and result in a quantifiable decrease in the number of students forced to live in the surrounding off-campus residential neighborhood.

BZA
Case No. 16553
Exhibit No. 189

Board of Zoning Adjustment
District of Columbia
CASE NO.16553
EXHIBIT NO.189

(5) ANC-2A Resolution 00-4F, filed April 19, 2000, BZA Case #16553, Exhibit #114, with attachment of a 12-page report setting forth the issues and concerns of ANC-2A covering (a) the Legal Standards for approval, (b) a Summary of the argument, (c) Student Housing and University Expansion and (d) Traffic and Parking. The Report relies heavily on Title 11, DCMR 210.2 and on specific portions of the Comprehensive Plan that refer directly to the need to alleviate the intense pressure on Foggy Bottom/West End housing stock by the overflow of students into the residential community, and concludes that the Board should deny GWU's application for approval of the proposed Campus Plan. This resolution with attachment was filed to meet the requirements for the originally scheduled hearing of April 26, 2000 (copy attached).

It should be noted here that prior to the April 26 BZA hearing at which GWU presented its campus plan, representatives of GW, the ANC, the community and the Office of Planning met with a facilitator to determine whether through negotiation some issues might be resolved.

As a result of this effort it was generally agreed that over a two-year period freshmen and sophomores will be required to live on campus; the code of student conduct will apply to students living off campus; a verifiable census of undergraduate students in Foggy Bottom/West End will be conducted; a transportation management program will encourage metro use by GWU students, faculty and staff; and an Advisory Council of community/GW representatives will be established.

However, on the more substantive issues that address the protection and continued viability of the FB/WE residential neighborhood, containment of GW's expansion therein, and a decrease in number of students in FB/WE, we were unable to reach accord. *

A summary of issues and recommendations follows:

(1) The GWU submission should present only the facts that require BZA consideration in compliance with 11 DCMR 210.4 that "The applicant shall submit to the Board a plan for developing the campus as a whole [which should include university properties outside as well as inside the campus boundaries] , showing the location, height, and bulk, where appropriate, of all present and proposed improvements, including but not limited to the following:

(a) Buildings and parking and loading facilities;
(b) Screening, signs, streets and public utility facilities;
(c) Athletic and other recreational facilities; and
(d) A description of all activities conducted or to be conducted on the campus, and of the capacity of all present and proposed campus development."

*An OP-proposed concept of conducting a verifiable census of students in FB/WE, which would then be ratcheted down over specific periods of time was favorably considered but rejected by GW because of concerns about the DC Human Rights Act.

GWU's Campus Plan as submitted and amended three times does not comply with this regulation. The Board should require submission of more detailed information so that it may reach an informed and equitable decision.

(2) A moratorium should be placed on GW purchases for academic or institutional use in areas immediately outside the approved campus boundaries unless cleared by the BZA to be in conformance with Title 11, DCMR 3108.1 and 3108.3, and determined not to be detrimental to the residential neighborhood.

(3) An immediate verifiable count of students living in Foggy Bottom/ West End should be taken so that impact on the surrounding neighborhood can be quantified and efforts to decrease the student population in the area measured.

(4) No further non-residential development should be approved within the Campus Plan boundaries pending construction of additional dormitory space, and housing first available should be designated for students currently living in the FB/WE community.

(5) Freshmen and sophomores should be housed on-campus, and a cap on enrollment of undergraduate students should be imposed until on-campus housing for all undergraduates is available.

(6) Where GW has invested in off-campus housing, there should be no favoring of students over non-students in rental policies, advertisement or placement.

(7) Non-compliance of the BZA Order on this Application by the University should result in stated penalties including no further processing of applications and/or DCRA permits.

(8) Appendix C of the Plan gives the current total for numbers of students, faculty and staff at 26,389 and a year 2010 projection of 32,529, an increase of 6,140. This is an enormous increase for this already congested area and the Plan as submitted gives insufficient detail as to how the University plans to accommodate this 23% increase in total headcount. The BZA should have this information before making its decision.

(9) An increase in on-campus parking is of paramount concern to the ANC and the FB/WE community. GWU currently has six construction projects in process. The minimum spaces required (2700) should be increased as additional parking comes on line upon completion of the Parking Garage, the Health and Wellness Center and the Media Center, and future construction projects should be required to provide additional on-campus, off-street parking.

(10) The approved Campus Plan should include a pledge that University development will honor and support the city's commitment to Historic Preservation.

The razing of 33 townhouses in Square 43 and the recent demolition of the President's House (without ANC approval) raise concerns as to GW's dedication to this concept.

(11) Campus boundaries should be defined and meaningful, with enforceable penalties for non-compliance with stated requirements.

(12) Future use of Square 54 (the old hospital) is defined in Figure E as open to use by all four land use categories. A substantial portion of this property should be dedicated to student housing (500 units, or 1000-1500 beds), and careful scrutiny must be given to any land use proposals, with particular attention to environmental, traffic and parking requirements.

(13) With the recent excessive growth of enrollment, support staff and faculty and the proposed increases cited in (8) above, a ten-year plan does not allow adequate flexibility in dealing with issues such as enrollment, student behavior, parking and enforcement. A five-year time period would serve far better to reassess compliance with this order and with the Comprehensive Plan and to readdress university impact upon the surrounding residential neighborhood.

(14) Matter-of-Right usage by universities outside established campus boundaries should be controlled and approved by BZA or the Zoning Commission (whichever is covering campus plans). The requirement that larger, more intensively used facilities be placed in the core of the campus with more neighborhood-compatible uses reserved for the periphery should be enforced. However, ANC-2A would consider a relaxation of FAR within the campus boundaries in order to increase on-campus student housing and obtain a bona fide decrease in the student population housed in FB/WE.

(16) The DC Environmental Protection Act should be enforced in all its particulars as it relates to the campus.

CONCLUSION

Campus plans are essentially land use documents. GW's proposed Campus Plan includes a great deal of material on history, mission, goals, strategies and programs, but fails to fulfill the central purpose of a campus plan under the Zoning Regulations -- to demonstrate that the university will not have objectionable impacts on neighboring residential property. It is this unregulated and uncontrolled use of land by GW in the surrounding area outside the approved campus borders that most concerns the citizens of FB/WE.

The Board should deny GWU's application for approval of the proposed campus plan until GW addresses these major issues raised by ANC-2A, and due Great Weight.

Respectfully submitted,

Barbara Spillinger

Barbara Spillinger, Chair
Advisory Neighborhood Commission 2A

Enclosures

Note: Time constraints prevent assessment and response to yet another GW submission, this one dated September 7 and just received (11 a.m., 9/8). We expect to address this material at the September 13 BZA hearing.

DATE: August 30, 2000

SMD	AYE	NAY	ABSTAIN	ABSENT	MOVED	SECONDED
01 SHEEHEY	X					
02 PRICE				X		
03 TYLER				X		
04 SPILLINGER	X				X	
05 MILLER	X					X
06 MANDELBAUM	X					

Barbara Spillinger

CHAIRPERSON/~~SECRETARY~~

cc: Office of Planning
Dorothy Miller
Steven Mandelbaum
Sara Maddox
Ellie Becker, Foggy Bottom Association
Maria Tyler
James McLeod
James T. Draude
Michael Thomas
Maureen E. Dwyer, ShawPittman

CERTIFICATE OF SERVICE

I hereby certify that on September 8. 2000, I caused to have hand delivered a copy of the letter with attached materials submitted to BZA Application No. 16553 to the following parties:

Andrew Altman, Director
Julie Wagner
Office of Planning
801 North Capitol Street, NW
4th Floor
Washington, DC 20002

Maureen E. Dwyer, Esq.
Allison C. Prince, Esq.
Shaw Pittman
2300 N Street, NW
Washington, DC 20037

James T. Draude, Esq.
Driscoll & Draude
1230 31st Street, NW, 2nd Floor
Washington, DC 20007

Dorothy Miller, Commissioner
ANC-2A05
2440 Virginia Avenue, NW, No. D206
Washington, DC 20037

Maria Tyler, Commissioner
ANC-2A03
949 25th Street, NW
Washington, DC 20037

Steve Mandelbaum, Commissioner
ANC-2A06
2222 Eye Street, NW, No. 513
Washington, DC 20037

Sara Maddux
555 21st Street, NW, #401
Washington, DC 20006

Michael Thomas, Esq., President
Foggy Bottom Association
2501 M Street, NW, #611
Washington, DC 20037

Ellie Becker, V.P.
Foggy Bottom Association
2528 Eye Street, NW
Washington, DC 20037

James McLeod, Esq.
2424 Penna. Avenue, NW, #407
Washington, DC 20037

★ ★ ★ Foggy Bottom and West End
Advisory Neighborhood Commission (ANC-2A)

c/o St. Mary's Court 725 24th Street, NW Washington, DC 20037 (202) 736-1775

April 12, 2000

Jerrily R. Kress
Director
Office of Zoning
Room 210
441 Fourth Street NW
Washington, D.C. 20004

Re: BZA Application No. 16553
George Washington University
Campus Plan (2000 - 2010)

Dear Ms. Kress:

This letter authorizes James T. Draude, Esquire of Driscoll & Draude to represent Advisory Neighborhood Commission 2A ("ANC 2A") in the above-referenced case. Mr. Draude is authorized to bind ANC 2A in this case.

Sincerely,

Barbara Spillinger

Barbara Spillinger
Chair

cc: Maureen E. Dwyer, Esquire
Wilkes, Artis, Hedrick & Lane

BZA
Case No. 16553
Exhibit No. 98

DISTRICT OF COLUMBIA
00 APR 13 P4:19

★ ★ ★ Foggy Bottom and West End
Advisory Neighborhood Commission (ANC-2A)

c/o St. Mary's Court 725 24th Street, NW Washington, DC 20037 (202) 736-1775

'00 FEB 17 P4:23

DIST

February 17, 2000

16553

Jerrily R. Kress, Executive Director
D.C. Zoning Secretariat
441 4th Street, NW, Room 210
Washington, DC 20001

Re: George Washington University's Draft Campus Plan for 2000-2010

Dear Mrs. Kress:

Last evening at its regularly scheduled monthly meeting, properly noticed and with quorum present, Advisory Neighborhood Commission 2A unanimously approved the attached letter to the Zoning Secretariat.

In essence, it encapsulates the deficiencies in the current draft Campus Plan submitted by George Washington University and asks that the Plan be resubmitted to describe building and growth with the requisite specificity and supporting detail to enable both the BZA and the ANC to effectively evaluate the overall effect of the University's planned development on the surrounding neighborhood over the next 10 years.

Respectfully submitted,

Barbara Spillinger

Barbara Spillinger, Chair
Advisory Neighborhood Commission 2A
202/338-2079

Attachments

BZA
Case No. 16553
Exhibit No. 25

Foggy Bottom and West End
Advisory Neighborhood Commission (ANC-2A)

c/o St. Mary's Court 725 24th Street, NW Washington, DC 20037 (202) 736-1775

'00 FEB 17 P4:23

February 16, 2000

DIS

Jerrily R. Kress, Executive Director
D.C. Zoning Secretariat
441 4th Street, NW, Room 210
Washington, DC 20001

Re: George Washington University's Draft Campus Plan for 2000-2010

Dear Mrs. Kress:

George Washington University (GWU) has filed draft copies of its proposed campus plan and traffic report for the years 2000 to 2010 with the Board of Zoning Adjustment (BZA), Case No. 16553. Hearings are currently scheduled for March 29 and April 26, 2000. This plan in its present form is unacceptable to Advisory Neighborhood Commission 2A (ANC-2A).

Campus plans are essentially land use documents. This one is heavy on history, mission, goals, strategies and programs, over which BZA has no authority -- but is short on specific plans and documentation for current and future use of presently owned properties and contemplated growth both inside and outside current campus boundaries, areas over which the BZA has jurisdiction.

ANC-2A requests that BZA return this submission and request a campus plan that describes building and growth with requisite specificity and sufficient information to evaluate the overall effect of proposed development on the surrounding neighborhood.

This draft is limited in that it covers only the property holdings inside the campus boundaries, which only indirectly affect the residential area. It fails to address the University's expansion beyond the approved campus boundaries, which is being accomplished through direct purchase of properties and/or the take-over of residential properties mainly for off-campus housing of students.

It is this unregulated and uncontrolled use of land by GWU in the surrounding area outside the approved campus borders that most concerns the citizens of the Foggy Bottom residential neighborhood. GWU's expansion beyond its approved borders by buying or de facto take-over of property in the residential neighborhood for University use is in direct violation of 11 DCMR 210.2 and 10 DCMR 1104.1, and makes a mockery of the campus plan process.

Examples of the gaps and inconsistencies in the present draft plan follow:

(1) In BZA Case No. 14455, the 1985-2000 Campus Plan, GWU stated that the student headcount was 17,445. In this draft, GWU states that the student headcount is 16,657 (page 20). Is it possible that 15 years later, during an era of University expansion, that there are significantly fewer students?

In the fall of 1997, GWU's web site stated the headcount was 19,063. How did the decrease to 16,657 come about? These discrepancies must be resolved and a time series of student headcount enrollment from the 1985 figure of 17,445 to the present provided, so that a verifiable count can be attained.

GWU has purchased 10 major properties outside the approved campus boundaries as well as virtually the entire Square 43 (see below), and has taken over in very large part 14 major residential apartments for student housing, all outside the approved campus boundaries (copy attached). Again, this expansion belies the submitted data for student headcount enrollment.

(2) GWU states in this draft that its Full Time Equivalent (FTE) faculty is projected to go from 1,340 to approximately 1,550 FTE by 2010. This compares with the figures in the 1985 campus plan of 1,479 to be increased to 1,550 by 2000. No supporting data is supplied, and the figures fail to correspond with purported expansion of the academic program.

(3) GWU states in this draft that staff may be increased from 6,815 FTE to about 9,000 FTE by 2010. This compares with 1985 campus plan figures of 9,900 increasing to 10,023 FTE by 2000. Again, no supporting data is supplied, and a considerably smaller staff to support a larger student enrollment and an increase in size and number of departments defies all logic.

In other words, in comparing figures for the year 2000 with those sworn to in 1985, it is senseless to accept GWU's projections as believable. Moreover, the impact on the neighborhood requires that a headcount approach, not a full Time Equivalent approach be used.

(4) The draft basically ignores the whole question of student housing, despite the fact that the community is on record as having stated to GWU on numerous occasions its strong objection to GWU's policy of using residential Foggy Bottom/West End as a virtual extension of University dormitories.

(5) Further, we find the Traffic and Parking Study woefully inadequate in that, among other deficiencies, it fails to assess the impact of traffic and parking as it relates to University use in contiguous areas outside the limited confines of the current campus boundaries. This must be remedied.

Briefly mentioned (page 25) in GWU's draft is Square 43, which the Office of Planning purposely exempted from the last campus plan, ruling that it be preserved as a buffer between the University and the residential area. In 1997, GWU purchased and razed 16 townhouses in the square. Subsequently, it purchased 17 more (leaving but

three), and this past week end those 17 were razed as well (see copies of DCRA raze request and Washington Post article re BZA's Order, dated August 14, 1988, attached). Plans for this site need to be addressed in the campus plan and developed cooperatively between the University and the community.

As is evident from the above, of paramount concern to ANC-2A is the insidious advancement of GWU into the residential FB/WE community. We are not alone in our concerns. The time has come when large universities, which are major land users in proportion to the total land available to the City. need to be constrained insofar as their ability to purchase, convert and remove from the tax rolls, residential properties occupied by taxpaying citizens to accommodate primarily non-taxpaying students.

ANC-2A finds the application contains an inordinate amount of promotional material, and a paucity of specific detail from which the BZA can make informed decisions. Even for buildings inside the present campus boundaries, there is little specificity on the sites to be developed.

ANC-2A urges the Board to review this draft now before the hearings commence, and to return the draft to the University with a request that a revised Campus Plan be submitted that covers in specific detail University plans for development within and without the campus boundaries for the next 10 years, with supporting documentation as to how it will accomplish its goals in concert with the primary goal of the Comprehensive Plan to stabilize, strengthen and protect residential neighborhoods.

Sincerely,

Barbara Spillinger

Barbara Spillinger, Chair
Advisory Neighborhood Commission 2A
202/338-2079

Attachments

DATE: February 16, 2000

SMD	AYE	NAY	ABSTAIN	ABSENT	MOVED	SECONDED
01 SHEEHEY	X					
02 PRICE	X					
03 TYLER	X					
04 SPILLINGER	X					
05 MILLER	X				X	
06 MANDELBAUM	X					X

Barbara Spillinger

CHAIRPERSON/~~SECRETARY~~

PRELIMINARY, INCOMPLETE LIST

GWU'S PURCHASES OF PROPERTIES OUTSIDE THE CAMPUS BOUNDARIES IN FB/WEND SINCE THE APPROVAL OF THE PRESENT CAMPUS PLAN.

General Contractors Bldg., 1957 E Street, N.W.

Parking lot (Square 122), 19th & E Streets, N.W. (?)

Assoc. of Life Underwriter Bldg., 1900 block of F Street, N.W.

2 Townhouses for University Club, 1916 & 1918 F Street, N.W.

Dakota Apartments, 2100 F Street, N.W.

Townhouse, 2138 F Street, N.W. (demolished).

Virtually all Townhouses in Square 43, 16 of which demolished, H & 23rd Streets & Va. Ave., N.W.

Riverside Tower, 2100 Va. Ave., N.W.

Howard Johnsons Hotel, 2700 block Va. Ave., N.W.

The Foggy Bottom Inn (now the GWU Inn), 824 New Hampshire Ave., N.W.

The Aston Apartments, 1129 New Hampshire Ave., N.W.

GWU'S DE FACTO TAKE-OVER OF HOUSING IN FB/WEND OUTSIDE THE CAMPUS BOUNDARIES THROUGH THE PREDOMINANT USE OF SUCH PROPERTIES FOR STUDENT HOUSING

The Statesman Apartments, 2020 F Street, N.W.

The Letterman House Condominium, 2030 F Street, N.W.

Columbia Plaza, (5 buildings), 2400 Va. Ave., N.W.

Bonwitt Plaza Condominium, 2401 H. St.

The Remington Apartments, 601 24th Street, N.W.

Jefferson House Condominium, 922 24th Street, N.W.

Claridge House Cooperative, 940-950 25th St., N.W.

The Bader Condominium, 2515 K Street, N.W.

The Swarthmore Condominium, 1010 25th St., N.W.

The Elise Aparrtments, 800block New Hampshire Ave., N.W.

The Savoy Apartments, 1101 New Hampshire Ave., N.W.

The Carriage House Condominium, 2201 L St., N.W.

Townhouses on the south side of the 2300 block of L Street, N.W.

2400 Penn. Ave., N.W.

An increasing number of townhouses in the Foggy Bottom Historic District

September 6, 1999

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
BUILDING AND LAND REGULATION ADMINISTRATION

RECEIVED
1-20-00

January 14, 2000

Dear ANC Chairperson:

Enclosed are copies of notices which were sent to the D.C. Register for publication this week. These notices list applications for permits to raze, and applications for permits to work in areas under the jurisdiction of D.C. Law 2-144.

If you have any questions or suggestions pertaining to these weekly notices, please call me on (202) 442-4455.

Sincerely,

Denzil L. Noble
Assistant Administrator

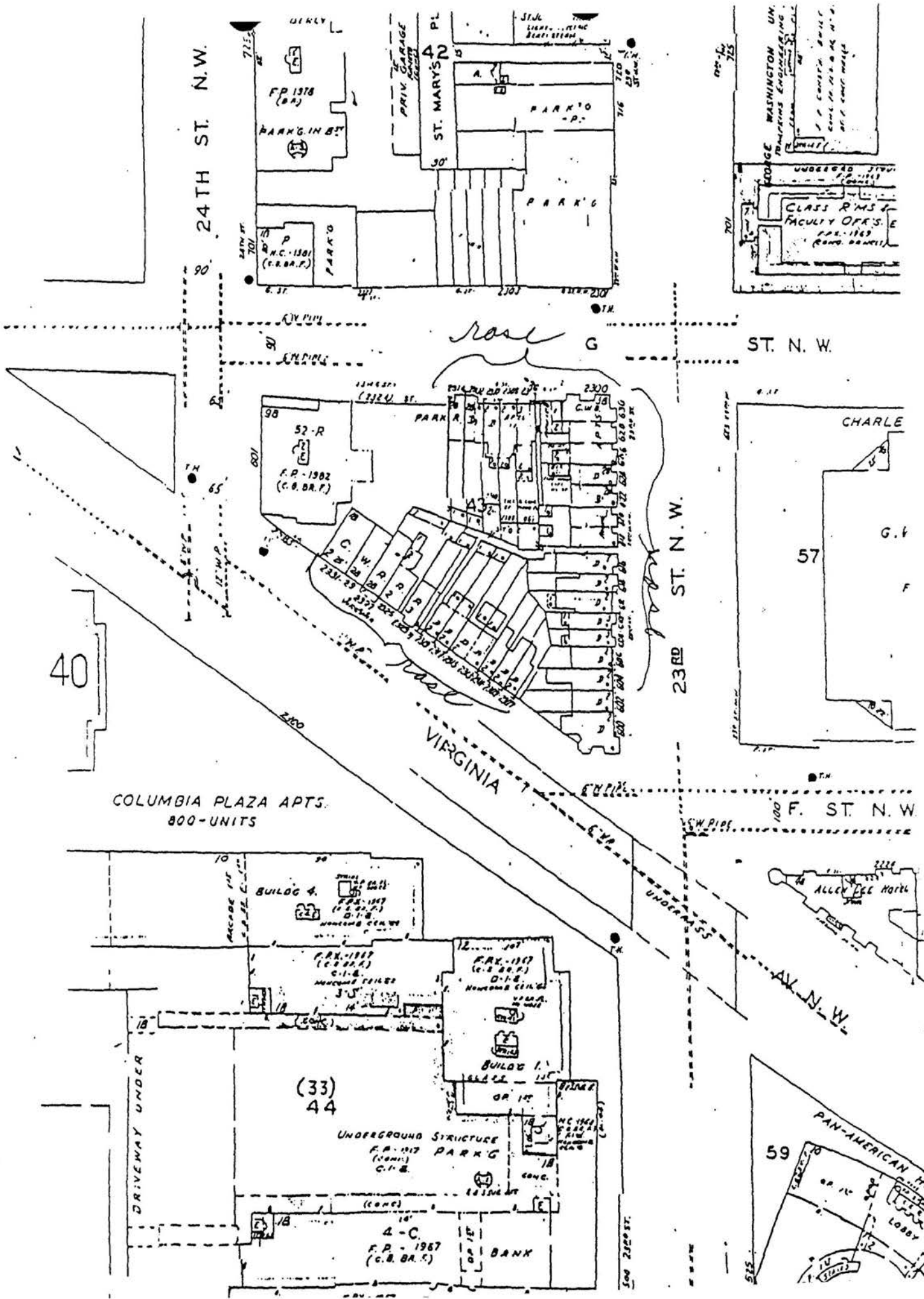
Enclosures

DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS

Notice of Public Interest

Forwarded for your information is a weekly listing of raze permit applications filed with the Permit Processing Division requesting authority to raze the listed structures within the District of Columbia.

ADDRESS	LOT	SQUARE	USE
734 6th Streeet, N.W.	839	454	4-Story Retail
606 23rd Street, N.W.	6	43	2-Story Twnhse
2311 Virginia Ave., N.W.	18	43	2-Story Twnhse
2313 Virginia Ave., N.W.	801	43	2-Story Twnhse
2315 Virginia Ave., N.W.	801	43	2-Story Twnhse
2323 Virginia Ave., N.W.	829	43	2-Story Twnhse
2325 Virginia Ave., N.W.	829	43	2-Story Twnhse
2321 Virginia Ave., N.W.	830	43	2-Story Twnhse
2309 Virginia Ave., N.W.	833	43	2-Story Twnhse
2307 Virginia Ave., N.W.	836	43	2-Story Twnhse
2327 Virginia Ave., N.W.	840	43	2-Story Twnhse
2329 Virginia Ave., N.W.	841	43	2-Story Twnhse
610 23rd Street, N.W.	844	43	2-Story Twnhse
612 23rd Street, N.W.	857	43	2-Story Twnhse
2317 Virginia Ave., N.W.	854	43	2-Story Twnhse
2319 Virginia Ave., N.W.	854	43	2-Story Twnhse
608 23rd Street, N.W.	855	43	2-Story Twnhse
AJE Bldg → 1957 E Street, N.W.	835	122	4-Story Office Bldg.
16 New York Ave., N.E.	31	670	2-Story Twnhse
18 New York Ave., N.E.	30	670	2-Story Twnhse
20 New York Ave., N.E.	29	670	2-Story Twnhse
22 New York Ave., N.E.	28	670	2-Story Twnhse
24 New York Ave., N.E.	27	670	2-Story Twnhse
26 New York Ave., N.E.	26	670	2-Story Twnhse
30 New York Ave., N.E.	24	670	2-Story Twnhse
32 New York Ave., N.E.	23	670	2-Story Twnhse
34 New York Ave., N.E.	22	670	2-Story Twnhse
38 New York Ave., N.E.	20	670	2-Story Twnhse
44 New York Ave., N.E.	17	670	2-Story Twnhse
46 New York Ave., N.E.	16	670	2-Story Twnhse
50 New York Ave., N.E.	14	670	2-Story Twnhse
52 New York Ave., N.E.	13	670	2-Story Twnhse


24TH ST. N.W.
ST. MARY'S PL
42
PARK'G
FP 1378
(B.A.)
PARK'G IN B'S
P
N.C.-1381
(C.B. BR. F.)
PARK'G
PRIV. GARAGE
G ST. N.W.
CLASS R'MS &
FACULTY OFF'S.
F.P.-1963
(CONC. BR. WALLS)
52-R
F.P.-1982
(C.B. BR. F.)
PARK'G
23RD ST. N.W.
CHARLE
57
40
VIRGINIA
COLUMBIA PLAZA APTS.
800-UNITS
F. ST. N.W.
BUILD 4.
F.P.-1967
(C.B. BR. F.)
C.I.-E.
BUILD 1.
(33)
44
UNDERGROUND STRUCTURE
F.P.-1917
(CONC.)
C.I.-E.
PARK'G
4-C
F.P.-1967
(C.B. BR. F.)
BANK
DRIVEWAY UNDER
PAN-AMERICAN
59
LOBBY

8/14/88

Panel Rules Against GWU Boundary

Foggy Bottom Residents Win Long-Running Battle Over NW Block

By David S. Hilzenrath
Washington Post Staff Writer

The D.C. Board of Zoning Adjustment has awarded Foggy Bottom activists the prize in a long-running zoning contest over a corner of the George Washington University campus.

The board last week declared a city block on the southwest fringe of the campus off-limits to university use, siding with residents who sought to prevent a further erosion of their neighborhood.

"It's a rollback," said William Diedrich, a homeowner who fought the university. "The university has been devouring Foggy Bottom, and they've been pushed back."

"The block will at least for the foreseeable future remain residential," Diedrich said.

University officials declined to discuss the decision, and its effect on the institution's planned long-term expansion remained unclear.

GW's campus plan for the year 2000 calls for a 15 percent increase in the school's enrollment, which now totals 17,445, and the addition of 1.9 million to 2.5 million square feet of floor space within the campus boundaries. The expansion is needed to replace obsolete facilities, relieve crowding, absorb the enrollment growth and house new or expanded programs, according to the school's long-term campus plan.

> *"The university has been devouring Foggy Bottom...."*
> -- Homeowner William Diedrich

For almost two decades, a roughly triangular block domilated by row houses and apartments had been designated part of the school's Northwest Washington campus. Residents who had watched the university gradually acquire portions of the property assumed that it was only a matter of time before GW assembled enough land to undertake a major redevelopment there.

In the meantime, some feared, the likelihood of eventual redevelopment would ensure a gradual deterioration of the block, which is bounded by Virginia Avenue and G, 23rd and 24th streets NW. Earlier this year, after reviewing a set of long-range development guidelines for the university, the zoning board excised the block from the 45-acre area zoned for university use. It also removed the site of the Concordia United Church of Christ, a historic landmark at 1920 G St., from the campus.

GW asked the board to reverse those decisions, arguing that another major land owner on the triangular block supported the school's claim to it as part of its campus. Nevertheless, at last week's meeting, the panel reaffirmed its earlier position.

GW now owns 83 percent of the land within its borders, which generally follow 24th Street, Virginia Avenue, F Street, 19th Street and Pennsylvania Avenue NW. It has said that it intends to acquire the remaining land within the next 12 years.

The university recently bought an apartment building at 2121 I St.

See GW, F4, Col. 1

REAL ESTATE

D.C. Board Declares Block Off-Limits to University Use

GW, From F1

NW, the Schenley, which it hopes to convert to campus housing in the future, according to a paper filed with the zoning board.

Under last week's zoning board order, the school can retain ownership of property on the excised block, but it cannot convert it to classrooms or other academic or administrative facilities.

Edward Curry, executive director of the BZA, said the residential zoning that now applies to the block might allow GW to build a dormitory there. "It looks like there's that potential and it's a real potential," Curry said.

On several other controversial points, the BZA supported the university. It rejected Advisory Neighborhood Commission 2A's recommendation that another church and three apartment buildings, including the Schenley, be removed from the campus zone. It also allowed GW to continue leasing several buildings to generate income.

The 1970 campus plan stated that the commercial buildings should be converted to academic use, and residents have argued that the university should move into these existing buildings before it builds or buys new ones.

THE FOGGY BOTTOM WEST END ADVISORY NEIGHBORHOOD COMMISSION 2A
Resolution No. 99-12B

WHEREAS, George Washington University has submitted to the community a Draft Foggy Bottom Campus Plan for the years 2000 through 2010, and

WHEREAS, this draft envisions no change in the campus boundaries from those identified in the current Campus Plan, which is in effect until December 31, 2000, even though the University has purchased and continues to acquire additional properties outside the approved campus boundaries, and

WHEREAS, with ever-increasing enrollment no new dormitory space is proposed within the approved campus boundaries, and

WHEREAS, the current campus plan has been inadequate in providing the necessary protection for the residential areas surrounding the University, and

WHEREAS, ANC-2A must be prepared to document all aspects of campus plan development, enumerating student density, traffic flow, parking requirements, student housing, etc. and from this documentation be able to offer a number of alternatives to proposals from GWU, and

WHEREAS, ANC-2A has started a process of interviewing several consultants, lawyers and other professionals with expertise in these and related issues, and

WHEREAS, since ANC-2A has limited funds, the community will need to continue to be involved in the active support of the Commission and in preparing material for use in activities of ANC-2A to counter the adverse impact of GWU on our residential neighborhood and DC finances and planning in general,

THEREFORE BE IT RESOLVED that ANC-2A initially authorizes the expenditure of up to $5,000 for professional assistance in support of its response to the above referenced Campus Plan.

DATE: Dec. 15, 1999

SMD	AYE	NAY	ABSTAIN	ABSENT	MOVED	SECONDED
01 SHEEHEY	X					
02 PRICE	X					X
03 TYLER	X					
04 SPILLINGER	X				X	
05 MILLER	X					
06 MANDELBAUM	X					

Barbara Spillinger
CHAIRPERSON/SECRETARY

★ ★ ★ Foggy Bottom and West End
Advisory Neighborhood Commission (ANC-2A)

c/o St. Mary's Court 725 24th Street, NW Washington, DC 20037 (202) 736-1775

April 18, 2000

'00 APR 18 P4:25

Ms. Sheila Cross-Reid, Chair
Board of Zoning Adjustment
441 Fourth Street, N.W. - Room 210
Washington, D.C. 20001

Re: BZA Application No. 16553 --
George Washington University Campus Plan - 2000-2010

Dear Madam Chair:

Last evening at a Special Public Meeting, duly noticed and with a quorum present, ANC-2A unanimously approved the enclosed resolution requesting that the Applicant in the above case be heard on April 26, 2000, and that ANC-2A and parties/persons in opposition be heard on May 24, 2000.

The reasons therefor are spelled out in the resolution and focus upon the critically short period of time for reply to a new GWU filing presented on April 12.

It is our intent to bring this up as a **preliminary matter** at the hearing on April 26, or if the schedule permits, would ask that this be request be considered at the next regular meeting of the Board of Zoning Adjustment.

Respectfully submitted,

Barbara Spillinger

Barbara Spillinger, Chair
Advisory Neighborhood Commission 2A

Enclosure

cc: Office of Planning

BZA
Case No. 16553
Exhibit No. 111

THE FOGGY BOTTOM/WEST END ADVISORY NEIGHBORHOOD COMMISSION
(ANC 2A) passed the following Resolution #00-~~1E~~
April 17, 2000

WHEREAS, on December 28, 1999, George Washington University ("GWU") filed with the Board of Zoning Adjustment ("BZA") Application No. 16553 for special exception approval of a Foggy Bottom Campus Plan for the Years 2000-2010; and

WHEREAS, in support of Application No. 16553, GWU filed its proposed "Foggy Bottom Campus Plan, Years 2000 through 2010", dated December 28, 1999, and a Traffic and Parking Study, dated December 21, 1999; and

WHEREAS, in accordance with 11 DCMR 3115, the BZA has requested ANC 2A's report on Application No. 16553; and

WHEREAS, the BZA's rules require ANC 2A to hold a properly noticed public meeting to consider and adopt its report on an application (11 DCMR 3115.1); and

WHEREAS, ANC 2A's report on Application No. 16553 is due on April 19, 2000, with BZA hearings scheduled for April 26, 2000 and May 24, 2000; and

WHEREAS, ANC 2A's regular meeting for the month of April was held on April 12, 2000; and

WHEREAS, on April 12, 2000, GWU filed a "Statement of the Applicant" in Application No. 16553, including a revised "Foggy Bottom Campus Plan, Years 2000 through 2010", dated April 12, 2000, and a revised Traffic and Parking Study, dated March 9, 2000, altogether comprising approximately 346 pages of materials; and

WHEREAS, seven days (April 12 to April 19) is not sufficient time for ANC 2A to review the additional materials filed by GWU on April 12, 2000, to hold a public meeting thereon, and to prepare a response thereto (aggravated by the fact that the seven days overlap Easter week and Passover);

BE IT RESOLVED, that ANC 2A requests the BZA to modify the hearing procedures for Application No. 16553 to provide that: 1) GWU and parties/persons in support of the Application will present their evidence and be cross-examined at the hearing on April 26, 2000, and 2) ANC 2A and parties/persons in opposition to the Application will present their evidence and be cross-examined at the hearing on May 24, 2000; and

BE IT FURTHER RESOLVED, that ANC 2A requests leave to file a

supplemental or revised report on Application No. 16553 on or before May 17, 2000.

DATE: April 17, 2000

SMD	AYE	NAY	ABSTAIN	ABSENT	MOVED	SECONDED
01 SHEEHEY				X		
02 PRICE	X				X	
03 TYLER	X					
04 SPILLINGER	X					
05 MILLER	X					X
06 MANDELBAUM				X		

Barbara Spillinger
CHAIRPERSON/SECRETARY

★ ★ ★ Foggy Bottom and West End
Advisory Neighborhood Commission (ANC-2A)

c/o St. Mary's Court 725 24th Street, NW Washington, DC 20037 (202) 736-1775

April 18, 2000

'00 APR 19 P4:21

Ms. Sheila Cross Reid, Chair
Board of Zoning Adjustment
441 Fourth Street, N.W. - Room 210
Washington, D.C. 20001

Re: BZA Application No. 16553 -- George Washington University Foggy Bottom Campus Plan -- Years 2000-2010

Dear Chairperson Reid and Members of the Board:

On April 12, 2000, ANC-2A held its properly noticed monthly public meeting, and with all six commissioners present, unanimously approved Resolution 00-4C, copy attached, declaring George Washington University's (GWU) Foggy Bottom Campus Plan for the years 2000-2010 unacceptable as submitted.

Also on April 12, 2000, GWU filed an amended submission of its campus plan and traffic report (BZA Case No. 16553). The BZA hearing on the above application is scheduled for April 26, 2000, and the required filing deadline for ANC-2A's submission is April 19, so, with the required notice, a Special Public Meeting was called for April 17 to consider ANC's response to GWU's proposed campus plan..

The overarching matters of community concern are enumerated in the attached resolution. We look forward to the opportunity of presenting these concerns before the BZA.

Respectfully submitted,

Barbara Spillinger

Barbara Spillinger, Chair
Advisory Neighborhood Commission 2A

Attachment
cc: Andrew Altman, OP

BZA
Case No. 16553
Exhibit No. 113

THE FOGGY BOTTOM/WEST END ADVISORY NEIGHBORHOOD COMMISSION
(ANC-2A) passed the following Resolution #00-4C
April 12, 2000

WHEREAS George Washington University (GWU) has filed with the Board of Zoning Adjustment (BZA) an application for approval of its Foggy Bottom Campus Plan for the years 2000 through 2010; and

WHEREAS community representatives have met repeatedly and at length with representatives of the University to explore whether there were areas of common agreement in the proposal;

WHEREAS these discussions met with limited success, but failed to resolve major areas of contention;

WHEREAS the University's heavily increased enrollment of full time students over the period of the current campus plan, without commensurate available dormitory space, has created an environment where students are forced to seek housing in the surrounding residential neighborhood, resulting in the displacement and flight of tax-paying residents;

WHEREAS the University's response to these conditions has been to purchase properties outside its campus boundaries including many apartment buildings, residences and hotels, and states that it intends to continue these practices without provision for review or regulation of its acquisitions;

WHEREAS such practices obviate the purpose of Campus Plan boundaries;

WHEREAS Universities are not permitted in residential and special purpose districts as a matter of right; the Zoning Regulations afford no privileged position to colleges and universities, and the thrust of the Zoning Regulations is to keep universities from expanding into residential neighborhoods without control;

WHEREAS the Comprehensive Plan forcibly calls attention to the negative impact of GWU's intrusion into the surrounding residential neighborhood;

WHEREAS the DC Zoning Regulations stipulate that use as a college or university shall be located so that it is not likely to become objectionable to neighboring property because of noise, traffic, number of students, or other objectionable conditions; and

WHEREAS the Mayor has repeatedly emphasized the importance of providing and protecting housing for moderate income residents of inner city neighborhood rings;

NOW THEREFORE, ANC-2A finds GWU's Campus Plan as submitted unacceptable and asks particularly that student enrollment be curtailed until adequate on-campus housing, parking and other facilities are made available and result in a quantifiable decrease in the number of students forced to live in the surrounding off campus residential neighborhood.

DATE: April 12, 2000

SMD	AYE	NAY	ABSTAIN	ABSENT	MOVED	SECONDED
01 SHEEHEY	X				X	
02 PRICE	X					
03 TYLER	X					
04 SPILLINGER	X					
05 MILLER	X					X
06 MANDELBAUM	X					

Barbara Spillinger
CHAIRPERSON/SECRETARY

★ ★ ★ Foggy Bottom and West End
Advisory Neighborhood Commission (ANC-2A)

c/o St. Mary's Court 725 24th Street, NW Washington, DC 20037 (202) 736-1775

April 18, 2000

Ms. Sheila Cross Reid, Chair
Board of Zoning Adjustment
441 Fourth Street, N.W. - Room 210
Washington, D.C. 20001

00 APR 19 P 4:21

Re: BZA Application No. 16553 -- George Washington University Foggy Bottom Campus Plan -- Years 2000-2010

Dear Madam Chair and Members of the Board:

Last evening (April 17, 2000) at a Special Public Meeting, duly noticed and with a quorum present, ANC-2A, following discussion among the Commissioners and with community input, approved Resolution No. 00-4F relative to the George Washington University Foggy Bottom Campus Plan.

The BZA hearing on the above application is scheduled for April 26, 2000. ANC-2A respectfully requests that BZA require that GWU have present and available the University's Registrar who should be able to respond in a verifiable way to questions regarding numbers of students and where they are housed.

ANC-2A further requests that two members of the DC government be asked to be present: (1) a traffic expert from the Department of Public Works, and (2) Ellen McCarthy from the Office of Planning, who has considerable knowledge of and expertise in the issues under discussion.

In preparation for the upcoming BZA hearing April 26, members of the Foggy Bottom/West End community have been meeting with representatives of the University, the Office of Planning and a facilitator in an attempt to find common ground on some of the issues that divide us. Although we believe these discussions served a constructive purpose, and may be the basis for continuing communal communication, we were disappointed that on substantive issues we were unable to reach accord.

The Resolution and the Report to which it refers are attached.

Respectfully submitted,

Barbara Spillinger, Chair
Advisory Neighborhood Commission 2A

Attachments (2)
cc of letter: Sheri Pruitt Williams, Jerrily R. Kreas,
Andrew Altman, Office of Planning

BZA
Case No. 16553
Exhibit No. 11K

THE FOGGY BOTTOM/WEST END ADVISORY NEIGHBORHOOD COMMISSION (ANC 2A) passed the following Resolution #00-16
April 17, 2000

WHEREAS, George Washington University ("GWU") has filed with the Board of Zoning Adjustment ("BZA") Application No. 16553 for special exception approval of a Foggy Bottom Campus Plan for the Years 2000-2010; and

WHEREAS, in accordance with 11 DCMR 3115, the BZA has requested ANC 2A's report on Application No. 16553;

BE IT RESOLVED, that ANC 2A adopts the "Report of Advisory Neighborhood Commission 2A to the Board of Zoning Adjustment on Application No. 16553 by George Washington University for Approval of a Campus Plan for Years 2000-2010", dated April 17, 2000, and for the reasons stated in that report recommends that the BZA deny Application No. 16553; and

BE IT FURTHER RESOLVED, that some or all of the following members of ANC 2A will represent ANC 2A at the hearings on Application No. 16553: Commissioners Sheehey, Price, Tyler, Spillinger, Miller, and Mandelbaum.

DATE: April 12, 2000

SMD	AYE	NAY	ABSTAIN	ABSENT	MOVED	SECONDED
01 SHEEHEY				X		
02 PRICE	X				X	
03 TYLER	X					
04 SPILLINGER	X					
05 MILLER	X					X
06 MANDELBAUM				X		

Barbara Spillinger
CHAIRPERSON/SECRETARY

April 17, 2000

REPORT OF ADVISORY NEIGHBORHOOD COMMISSION 2A
TO THE BOARD OF ZONING ADJUSTMENT ON
APPLICATION NO. 16553 BY GEORGE WASHINGTON UNIVERSITY
FOR APPROVAL OF A CAMPUS PLAN FOR YEARS 2000-2010

This report sets forth the issues and concerns of Advisory Neighborhood Commission 2A ("ANC 2A") regarding Application No. 16553 by George Washington University ("GWU") for special exception approval of a campus plan for the Years 2000-2010.

LEGAL STANDARDS

The District of Columbia Court of Appeals has stated that "the thrust of the [zoning] regulations is * * * to keep universities from expanding into residential neighborhoods *without control*."[1] The purpose of the Board's review of a campus plan is to evaluate the effect of the campus plan as a whole on the surrounding neighborhoods.[2] A proposed campus plan can be approved only if the Board finds that the plan is not likely to become objectionable to neighboring property because of noise, traffic, number of students, or other objectionable conditions and, in residential districts, that the plan will not result in excessive density or unreasonable campus expansion.[3] In addition, independent of the Zoning Regulations, the District of

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[1] George Washington University v. District of Columbia Board of Zoning Adjustment, 429 A.2d 1342, 1348-1349 (D.C. App. 1981).

[2] Levy v. District of Columbia Board of Zoning Adjustment, 570 A.2d 739, 742 (D.C. App. 1990).

[3] 11 DCMR 210; Levy, supra, 570 A.2d at 742.

Columbia Comprehensive Plan ("Comprehensive Plan"), as enacted into law by the District of Columbia Council (46 DCR 1441 (1999)), requires the Board to evaluate a proposed campus plan in light of the objectives and policies of the Comprehensive Plan:

> Section 112.6. The zoning impact of the District elements of the Plan is not limited to areas where amendments to the Zoning Regulations are required to eliminate inconsistencies between the Plan and zoning:
>
> (a) The Zoning Commission, the Board of Zoning Adjustment, and other District agencies shall also look to the District elements for general policy guidance;
>
> (b) To the extent they are relevant, the objectives and policies of the District elements of the Plan shall be considered in planned unit development, campus plan, special exception, variance and other decisions. 46 DCR 1462-1463 (1999)).

SUMMARY

GWU's proposed campus plan largely ignores the adverse impacts that the University has on surrounding neighborhoods caused by: 1) GWU's failure to build sufficient dormitories to house its students within the campus plan boundaries and GWU's concomitant practice of acquiring properties outside the campus plan boundaries for student housing, and 2) the traffic and parking impacts that spill into the neighborhoods outside the campus plan boundaries. GWU's proposed campus plan also completely ignores the numerous objectives and policies of the Comprehensive Plan that specifically relate to GWU.

It is GWU's unregulated and uncontrolled use of land in the surrounding area outside the approved campus plan boundaries that

most concerns the citizens of the Foggy Bottom/West End residential neighborhood. GWU's expansion beyond the approved campus plan boundaries by purchasing or de facto takeover of property in the residential neighborhood for university use violates the Zoning Regulations and the Comprehensive Plan and makes a mockery of the campus plan process as a land use planning tool.

STUDENT HOUSING AND UNIVERSITY EXPANSION

GWU does not have sufficient dormitory space within the campus plan boundaries to house its students. As a result, large numbers of students seek and obtain housing in the residential areas outside the campus plan boundaries. In addition, GWU has acquired numerous residential properties outside the campus plan boundaries and converted them to student housing.

Housing large numbers of students is an institutional university use that is not compatible, economically or socially, with a viable, permanent residential neighborhood. The Zoning Regulations expressly recognize "number of students" as one of the objectionable conditions that can be created by university use in residential districts (11 DCMR 210). While ANC 2A recognizes that not all students are a burden as neighbors, large numbers of students in a residential neighborhood inevitably include some students who create conditions that are not compatible with permanent residential use. The District of

Columbia is particularly concerned about preserving its permanent resident population and tax base. Student residents displace permanent residents, deplete available housing stock, erode the fabric of the neighborhood, and contribute little to the local tax base since their incomes are usually minimal and their legal residence is usually elsewhere.

ANC 2A has a long-standing policy and goal, as set forth in reports filed in prior cases before the BZA (see, e.g., BZA File No. 15793), that GWU should provide housing for all undergraduate students within the boundaries of the current campus plan to alleviate the deleterious effects of housing large numbers of students in the residential areas outside the campus boundaries. This policy was reaffirmed on September 29, 1999, by Resolution #99-9C, which stipulated that GWU house, at a minimum, 80 percent of the headcount of full-time undergraduates in university-operated housing within the boundaries of the approved Foggy Bottom Campus Plan by the academic year beginning the fall of 2002, and every year thereafter. The Office of Planning recognizes that "a major community goal [in ANC 2A] has been to provide more on-campus student housing [at GWU] to reduce student impacts on the community" (Office of Planning report, dated April 3, 1995, filed in BZA case No. 16036, Ex. No. 27, p. 4).

The Comprehensive Plan includes numerous specific provisions regarding GWU and its impact on the Foggy Bottom/West End

neighborhood. The Comprehensive Plan recognizes the deleterious effects of housing large numbers of GWU students in residential areas outside of GWU's current campus plan boundaries and includes a policy that GWU should provide housing for its student body within the current campus plan boundaries and should stop conversion of buildings outside the campus boundaries to dormitories. Relevant sections of the Comprehensive Plan are as follows:

> Section 1303.7: Institutional growth, commercial expansion, and rising housing costs have lessened the amount of housing available in the Foggy Bottom and West End neighborhoods. The Comprehensive Plan and campus master plans provide the means for institutions and residents to address these issues. (46 DCR 1730 (1999)).
>
> Section 1305.1(j): An important element causing housing problems has been the demolition and conversion of housing to provide commercial and institutional buildings, university dormitories, offices, classroom space, hotels, and medical clinics. * * * To improve the housing stock and to prevent further loss of housing, adjustments shall be made to existing zoning regulations and to campus plans to address these problems. (46 DCR 1732 (1999)).
>
> Section 1325.2: The overriding issues for Ward 2 neighborhoods [include] the impact from uses such as * * * university expansions. (46 DCR 1757 (1999)).
>
> Section 1325.3: Loss of housing stock is also a critical problem in Foggy Bottom/West End, aggravated by the lack of dormitory construction on the George Washington University (GWU) campus * * *. Conversions of housing units, particularly apartments to

transient use (hotel, de facto hotels, and corporate apartments), to university dormitories and offices, and to medical offices/clinics is a major cause of depletion of the housing stock. (46 DCR 1757-1758 (1999)).

Section 1327.1(b): George Washington University continues to expand its operations in the Foggy Bottom area. Therefore, the University must work closely with the Foggy Bottom community on developing a campus plan. The campus plan should include sufficient dormitory space for the student body on campus to alleviate some of the pressure on housing by students. (46 DCR 1758-1759 (1999)).

Section 1342.1(b): The actions in support of the objective for major institutional complexes are as follows: * * * (b) Update campus plans for George Washington University and Georgetown University; as part of the campus plan the Foggy Bottom community needs to address: 1) the student housing issues by planning for future dormitories, and 2) the on-campus parking issue. GWU must take account of the residential and historic district status of Foggy Bottom in any future development. (46 DCR 1766 (1999)).

Section 1358.1: The George Washington University constitutes a major institutional presence in a zone between the Central Employment Area and residential Foggy Bottom. The expansion of the University has resulted in the diminishment of housing and the construction of buildings for the University purposes. This and other commercial usage is of grave concern to the Foggy Bottom residential community. Intense student pressure on Foggy Bottom's housing stock outside the campus, combined with the impact of university generated traffic has had a negative effect on residential Foggy Bottom. The University must continue to construct student dormitories to alleviate the pressure on the housing stock outside the boundaries

> of the campus plan. The University must be sensitive to the surrounding residential neighborhood.[4]

GWU's proposed campus plan includes two paragraphs (pp. 39-40) that attempt to show that GWU complies with the policies of the Comprehensive Plan. Those paragraphs do not even mention any of the foregoing provisions of the Comprehensive Plan that specifically relate to GWU.

GWU's proposed campus plan confirms that GWU intends to continue to purchase residential properties outside the campus plan boundaries for conversion to student housing. Two recent examples are Square 43 and Columbia Plaza Apartments. In 1988, the Board removed Square 43 from within the approved campus plan boundaries because "the Board believes the removal of Square 43 to be essential to the preservation and enhancement of residential uses in the Foggy Bottom neighborhood" (BZA Order No. 14455, dated February 25, 1998, p. 34). At that time, GWU owned only five town house lots in Square 43 (BZA File No. 14455, Ex. No. 128, Appendix L). Notwithstanding the Board's finding and order, GWU has since acquired almost all of the balance of the residential structures in Square 43 and currently plans to construct a dormitory on the site. ANC 2A recently learned that

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[4] The above-quoted provisions have been in the Comprehensive Plan since 1994 (41 DCR 5643, 5645, 5667, 5671, 5674, 5675-76, 5680 (1994)) and many of them have been in the Comprehensive Plan since 1989 (37 DCR 147, 150, 174, 175, 181, 184, 191 (1989)).

GWU has purchased part of the Columbia Plaza Apartment complex for student housing. Although GWU refuses to disclose the terms of the transaction, we understand that GWU has begun to offer to pay existing non-student tenants to move out.

GWU filed an amended proposed campus plan on April 12, 2000 that designates two small sites within the campus plan boundaries for construction of dormitories with a total of 420 beds. Those sites are not sufficient to alleviate the effects of housing large numbers of students outside the campus plan boundaries, particularly in light of the GWU's proposal to increase the student headcount by more than 3,000 over the current level. Additional sites within the campus plan boundaries should be designated for construction of dormitories (Square 54, the north half of Square 103, the southwest quadrant of Square 79, and the southeast quadrant of Square 101).

GWU must recognize that it has reached the limits of growth that can be accommodated at the Foggy Bottom campus. If GWU fulfills its obligation to house its existing student body within the current campus plan boundaries, GWU's Foggy Bottom campus clearly is insufficient in size to accommodate its planned expansion. GWU must consider locating academic functions outside the Foggy Bottom/West End area. Georgetown University successfully operates its law school several miles from its main campus. GWU itself has various academic operations in Northern

Virginia.

GWU's proposed campus plan should not be approved unless it is amended to include the following enforceable conditions:

a. The full time undergraduate student population will be capped at the current level (headcount).

b. No further non-residential development will be approved within the campus plan boundaries until GWU constructs sufficient dormitories to house full-time undergraduate students under conditions that will assure that no full-time undergraduate GWU students reside in residential areas of Foggy Bottom/West End by the academic year beginning the fall of 2002, and every year thereafter.

c. As a condition of approval of the campus plan, GWU will not acquire any further property, directly or indirectly, in residentially zoned areas within the boundaries of ANC 2A.

TRAFFIC AND PARKING

GWU's proposed campus plan includes a Traffic and Parking Study, dated December 21, 1999, by Gorove/Slade Associates, Inc. (Appendix M to the campus plan) ("Gorove Study") that purports to show that the proposed campus plan will not create adverse traffic and parking impacts. The fundamental problem with that study is that it addresses only traffic and parking impacts within the existing campus plan boundaries. It does not even attempt to address traffic and parking impacts that GWU creates outside the campus plan boundaries.

The Comprehensive Plan expressly recognizes that GWU already creates adverse traffic and parking impacts on neighboring residential areas outside the campus plan boundaries and includes

a policy that GWU should increase the amount of on-campus, off-street parking to alleviate such impacts. Relevant sections of the Comprehensive Plan are as follows:

> Section 1309.11: Parking in the residential neighborhoods of Ward 2 is a major problem. * * * Foggy Bottom and Georgetown are adversely affected by student parking from George Washington and Georgetown Universities; as such, efforts should be made by the universities to provide parking for these vehicles. (46 DCR 1738 (1999)).
>
> Section 1342.1(b): The actions in support of the objective for major institutional complexes are as follows: * * * (b) Update campus plans for George Washington University and Georgetown University; as part of the campus plan the Foggy Bottom community needs to address: * * * 2) the on-campus parking issue. (46 DCR 1766 (1999)).
>
> Section 1358.1: The George Washington University constitutes a major institutional presence in a zone between the Central Employment Area and residential Foggy Bottom. The expansion of the University has resulted in the diminishment of housing and the construction of buildings for the University purposes. This and other commercial usage is of grave concern to the Foggy Bottom residential community. Intense student pressure on Foggy Bottom's housing stock outside the campus, combined with the impact of university generated traffic has had a negative effect on residential Foggy Bottom.

The Gorove Study states (p. 2) that its purpose was "to determine the existing conditions on the roadway network within the Campus Plan boundaries, and to determine the impacts that the proposed Campus Plan development and growth components will have". The Gorove Study describes existing traffic conditions

only within the campus plan boundaries (pp. 3-10). The Gorove Study's description of existing parking conditions is confined the off-street parking facilities within the campus plan boundaries (pp. 15-17) and does not address on-street parking at all. The Gorove Study's analysis of the impact of campus development is confined to the impact on traffic and off-street parking within the campus plan boundaries (pp. 19-24).

The Gorove Study does not even mention the large numbers of students who live in the residential areas outside the campus plan boundaries, much less attempt to quantify and analyze the parking demand they create. The Gorove Study makes no effort to quantify how many students, faculty, staff, and visitors park on-street outside the campus boundaries.

GWU owns approximately 85% of the land within the campus plan boundaries. If effect, GWU has presented an analysis of traffic and parking impacts on its own property, rather than an analysis of traffic and parking impacts on the neighboring property outside the campus plan boundaries, as required by the Zoning Regulations.

GWU's proposed campus plan should not be approved until GWU presents an analysis of the traffic and parking impacts that GWU causes in the residential areas outside the campus plan boundaries.

CONCLUSION

GWU's proposed campus plan includes a great deal of material on history, mission, goals, strategies and programs, but fails to fulfill the central purpose of a campus plan under the Zoning Regulations -- to demonstrate that the university will not have objectionable impacts on neighboring residential property. Accordingly, the Board should deny GWU's application for approval of the proposed campus plan.