ARTER & HADDEN LLP
ATTORNEYS AT LAW

Cleveland
Columbus
Dallas
Dayton
Irvine
Los Angeles

1801 K Street, N.W.
Third Floor, L Street Entrance
Washington, D.C. 20006-1304
telephone 202.775.7100
facsimile 202.857.0172

San Diego
San Francisco
Washington, D.C.
Woodland Hills
Affiliate Office
Geneva, Switzerland

(202) 775-7116
gavin.williams@arterhadden.com

November 18, 2002

VIA LOCAL COURIER
Carol J. Mitten, Chair
D.C. Zoning Commission
441 4th Street, N.W., Suite 220
Washington, DC 20001

Re: **Zoning Commission Case No. 02-26: The George Washington University, Applicant**

Dear Ms. Mitten and Members of the Commission:

On behalf of our client, The George Washington University, we are pleased to submit herewith the University's Memorandum in Support of Application. Enclosed please find twenty (20) copies of said memorandum.

Please call with any questions or comments.

Sincerely,

Gavin Williams

D.C. OFFICE OF ZONING RECEIVED
2002 NOV 18 PM 4:44

ZONING COMMISSION
District of Columbia
Case 02-26
Exhibit 18

ZONING COMMISSION
District of Columbia
CASE NO.02-26
EXHIBIT NO.18

ARTER & HADDEN LLP
ATTORNEYS AT LAW

founded 1843

Austin
Cleveland
Columbus
Dallas
Dayton
Irvine
Los Angeles
Sacramento

1801 K Street, N.W., Suite 400K
Washington, D.C. 20006-1301
telephone 202.775.7100
facsimile 202.857.0172

San Antonio
San Diego
San Francisco
Washington, D.C.
Woodland Hills
Affiliated Offices
Brussels, Belgium
Geneva, Switzerland

Writer's Direct Dial: (202) 775-7101
Writer's email: Jerry.Moore@arterhadden.com

BEFORE THE
DISTRICT OF COLUMBIA ZONING COMMISSION

In the Matter of
The George Washington University
Application for Special Exception Under 11 D.C.M.R. § 210
for Premises at 2301 G Street, N.W. (Square 42, Lot 847)

Application No. 02-26

November 15, 2002

RECEIVED
D.C. OFFICE OF ZONING
2002 NOV 18 PM 4:43

MEMORANDUM IN SUPPORT OF APPLICATION

I. Action Requested

The George Washington University (the "University") requests special exception relief pursuant to Sections 210 and 3104.4 of the Zoning Regulations, for "further processing" under an existing campus plan to amend the Board of Zoning Adjustment's (the "BZA") March 31, 1998 Order No. 16276 (the "Order") (attached hereto as Exhibit A) to delete condition number one restricting the classes of users at the Lerner Health and Wellness Center (the "Center") and to amend condition number two to permit the facility to remain

open until 1:00 a.m. on all days except Saturday. The Center is located on the University's campus at 2301 G Street, N.W. (Square 42, Lot 847).

A. The University's Campus Plan

According to the Zoning Regulations, before requesting a special exception, the University must have presented to the Zoning Commission:

> a plan for developing the campus as a whole, 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 functions;
>
> (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.

11 D.C.M.R. § 210.4 (2002). The University has received the necessary approval through June 9, 2009 for its campus plan and remains in compliance with all applicable provisions and conditions of that plan. See BZA Order No. 16553, as modified by the Order of the U.S. District Court for the District of Columbia (dated April 12, 2002 in Civil Action No. 01-0895-CFO) (the "Remand Order") (attached hereto Exhibit B). Among other things, the approved campus plan anticipates that all high-density use buildings will be located in the interior of campus, while buildings that are non-high density uses will be located on the periphery of the campus. See BZA Order No. 16553, dated March 29, 2001. The BZA Order currently at issue concludes that the Center is not a major use, see Order at Findings of Fact 1 & 2, and the University will

demonstrate that the use profile that is requested herein is not of a high density.

In order to receive future special exceptions from the Zoning Commission, the University must be in compliance with conditions 1 through 19 of the BZA Campus Plan Orders in Application Nos. 16553 and 16553F. The University's Senior Counsel, Charles Barber, has summarized the steps the University has taken to comply with these conditions. See Status of Compliance of The George Washington University with BZA Campus Plan Conditions 1-19, dated November 15, 2002, attached hereto as Exhibit C. There are no other prerequisites by which the University must abide in order to seek this special exception.

B. Authority of the Zoning Commission

Pursuant to 11 D.C.M.R. Section 210.1, 3104.1, and 3104.4 of the Zoning Regulations, the Zoning Commission (the "Commission") is authorized to grant a special exception where, in its judgment, the special exception will be in harmony with the general purpose and intent of the Zoning Regulations and Map and will not tend to affect adversely the use of neighboring property in accordance with the Zoning Regulations and Zoning Map.

A college or university use is permitted in an R-5-D District if approved by the Commission as a special exception in accordance with the requirements of Section 210 of the Zoning Regulations. These regulations require that the Center be used so that "it is not likely to become objectionable to neighboring property because of noise, traffic, number of students or other objectionable

conditions" and that the special exception requested will be in harmony with the general purpose and intent of the Zoning Regulations and Map. See 11 D.C.M.R. §§ 210 and 3104.1 (1996 Supp.). Once these showings are made, the Commission ordinarily must grant the exception.[1] Citizens Coalition v. Board of Zoning Adjustment, 619 A.2d 940, 948 (D.C. App. 1993); First Baptist Church v. D.C. Board of Zoning Adjustment, 432 A.2d 695, 698 (D.C. 1981); Stewart v. D.C. Board of Zoning Adjustment, 305 A.2d 516, 518 (D.C. 1973).

II. Background

On March 31, 1998, the BZA approved a special exception for the construction and use of the Center. See the Order. In so doing, the BZA found that the campus plan "clearly anticipates an athletic facility within its periphery such as the Health and Wellness Center that has been proposed" and that the "anticipated use is not a major use." See Order at Findings of Fact 1 & 2. Despite such findings, the BZA conditioned this approval by limiting the use of the Center "to the students, faculty and staff of the Foggy Bottom campus only" and by mandating that "operation of the facility shall end at 10:00 p.m., Monday through Saturday and at 8:00 p.m. on Sundays." Id.

The Center opened in August 2001. During fifteen months of operation, the University has received numerous requests for access to the Center from

---

[1] The cases involve the authority and requirements imposed by the Zoning Regulations on the Board of Zoning Adjustment. However, in Z.C. Case No. 99-09, the Commission directed that all further processing special exception cases be filed in and decided by the Commission. DCR, December 8, 2000. The legal structure and requirements of special exception relief did not change.

individuals who live and work in the Foggy Bottom/West End neighborhood, alumni, and other friends or supporters of the University (including non-profit groups operating in the area). The BZA-imposed conditions require the University to deny these requests despite the availability of space within the Center.

The BZA's decision to restrict access to certain classes of users was based on the finding that while "students, faculty members, and staff of the Foggy Bottom campus will not create a traffic impact in their use of the facility... offering use of the facility to anyone who is not a student, faculty member, or staff person from the Foggy Bottom campus...will create an adverse traffic impact." See Order at Findings of Fact 3 & 4. Contrary to law, there was no evidence in the record to support this conclusion.

Its experience in operating the Center has accorded the University an opportunity to gather and consider actual usage data both on the Health and Wellness Center and the Smith Center, located only one block away, which has opened its doors both to the community and University alumni. As is evidenced herein, that usage profile unequivocally supports the University's contention that extending user privileges to those who live and work in the Foggy Bottom/West End area,[2] University alumni,[3] students, faculty and staff

---

2 This area is defined as 19th Street on the east, Constitution Avenue on the south, Rock Creek Park on the west and N Street on the north. With the exception of the southern boundary, this is the same definition as appears in the University's current campus plan. See BZA Order No. 16553 Findings of Fact ¶ 21.

of other University campuses,[4] guests of the above members, and friends and supporters of the University will not create an adverse impact in the Foggy Bottom/West End neighborhoods. Thus, the objective evidence confirms that the restrictions on the classes of users and the daily 10:00 p.m. closing hour restrictions have no basis of support. Should the modifications to these restrictions be made as proposed, the University plans to provide additional memberships to this health and wellness facility for up to 3000 additional individuals, regardless of class, with one-third coming from the people who live and work in the surrounding community. The University's empirical data, presented here as expert evidence, demonstrates that such an increase will not result in an adverse impact to the tranquility of the neighborhood.

III. Projected Usage in 1998

In support of its 1998 application, the University provided the BZA with projections of the number of users that will visit the Center during any given day (attached hereto as Exhibit D). Those projections indicated that the University could expect, during an average weekday (Monday through Thursday), 2,112 users to visit the facility throughout the day. Id. Of these

---

[3] Regulating the number of users of a particular facility is a more appropriate procedural zoning mechanism than regulating membership based on classes of individuals.

[4] This encompasses the University's Mt. Vernon Campus and its Virginia Campus.

users, 242 were expected during the 7:00 p.m. hour and 212 during the 2:00 p.m. hour. Friday and Saturday these numbers drop to just over a thousand users (1052), with the highest accumulation of users during any single hour again coming at 2:00 p.m. with 212 users. Id. An even further drop in use was projected for Sunday with only 493 users expected, with the 2:00 p.m. hour again being the highest accumulation with 142 users. Id.

The Center was constructed to hold almost 2000 single users at any given time.[5] However, the actual usage profile demonstrates that during the highest period of use, only 12.5% of the Center's capacity is in use – a number which is 87.5% under the Center's capacity of almost 2,000. Id.

In conjunction with the 1998 application, the University commissioned a transportation impact analysis of the Center (attached hereto as Exhibit E). This analysis determined that the Center would not pose an adverse impact on the community, regardless of who had access to it. The report concluded that 9% of all visitors arriving to the Center would do so by automobile with each automobile bringing 1.3 people. Id. Over the course of a typical day, the study found that 118 cars would make a trip to the Center. The largest accumulation of cars was projected to come during the 7:00 p.m. hour with 17 cars traveling to the Center. Id. This is in contrast to the 329 pedestrian trips that would also occur during this hour. Id. Further, the Center allowed access to a parking facility which expected to see 16 new vehicles seeking parking in the peak morning hours and 10 during the peak evening hours. Id. Fifty

percent of this traffic was projected to arrive at the Center from the north via 23rd Street, 40% from the south via 23rd Street, and the remaining 10% using G Street on the east. Id. Based on these projections, the study concluded, "the development of the Health and Wellness Center will generate a relatively small amount of traffic." Id. There was no evidence presented to the BZA to contradict these findings nor has any been presented to date.

IV. Actual Usage Since the Center First Opened

The firm of Brailsford & Dunlavey ("B&D") has analyzed the actual usage profile. B&D is a nationally recognized facility planning and project management firm that serves educational institutions, public agencies, and other clients having sports, recreational and entertainment facilities. In addition to compiling the data, B&D also compared its findings against research conducted at eight other urban institutions, like New York University and the University of Miami, to compare how other universities use facilities similar to the Center, including who uses the facilities and when the facilities close. B&D gathered its user profile by a combination of methods including, use of the "GWorld" card, which is necessary to enter the Center, and demographic information provided by the University. B&D concluded that the Center is under-utilized. See The George Washington University Lerner Health

5 The BZA concluded that this did not constitute a "major use."

and Wellness Center Project Memorandum, Brailsford & Dunlavey, dated November 13, 2002 (the "B&D Report") (attached hereto as Exhibit F).

On a typical day, B&D determined that the Center has peak usage during the evening hours and slower usage during the mornings and in the early afternoon. The greatest number of users at the Center at a single time was 243 users between the hour of 5:00 p.m. and 6:00 p.m. Id. This translates into a typical daily usage rate of less than 15% of the Center's capacity. Id.

When the numbers were analyzed over an entire week, B&D found that the busiest single day is Wednesday, when approximately 2,507 users entered the facility over the 15 hours that it is open. Id. This is more than double the amount who enter on Saturday (1,100) and nearly three times as many as on Sunday (853). Id. Of these users, 93% of them were students with the remaining 7% split between faculty and staff users. Id. Again, these numbers constitute but a small percentage of the Center's capacity.

B&D also examined monthly totals to test the consistency of its user numbers. January saw the most facility usage with 55,000 visitors over the course of the month – an average of 1,774 users a day. Id. Over the course of the year, the average month witnesses 49,000 users visiting the Center – an average of 1,633 users a day. Id. As expected, summer usage is far below that of the school year as only approximately 18,000 users per month (600 per day on average) visit during May through August. Id. Again, as was predicted two

years earlier, these numbers reflect a usage rate well below the Center's capacity.

The University retained Gorove/Slade and Associates ("Gorove") to determine if the impact on traffic and parking. Gorove conducted extensive surveys of the Center's users to validate their findings. Gorove also had access to traffic statistics for the recreational facility at the Ritz Carlton, located four blocks away. Gorove determined that the Center does not adversely influence either the flow of traffic through the surrounding community or the availability of parking in the surrounding area. See The George Washington University, Health and Wellness Center Special Exception Transportation Impact Summary, prepared by Gorove/Slade and Associates dated November 15, 2002 (the "Gorove Report") (attached hereto as Exhibit G).

Gorove determined that, on an average day, close to 2,400 people visited the facility. Id. Unsurprisingly, the peak hour of traffic for the center correlates to the peak accumulation of people inside the facility – 5:00 p.m. to 6:00 p.m. Id. As Ninety-three percent of those using the Center during this time were students, while the other 7% were either faculty or staff of the Foggy Bottom campus. Id. Only 9% of the students elected to drive to the Center while 21% of the faculty and staff came via automobile. Id. Of those who did drive to the Center, they either found street parking or parked in one of the University's parking facilities. Id. Most of the users either walked to the

Center or used the nearby public transportation.[6] Thus, of the 2,400 visitors throughout the course of an average day, over 2,200 chose not to drive to the Center. Id. Gorove concluded, based on their research, that the actual usage profile amounted to a negligible impact on the surrounding community or neighborhood tranquility.

V. The Smith Center

The Charles E. Smith Center is the home of the University's Department of Athletics and Recreation. The Smith Center houses many of the University's intercollegiate sports, such as basketball, volleyball, indoor soccer, swimming and squash. In order to remain useful, this facility is in need of renovation. In fact, the lack of regulation size squash courts in the Smith Center, and their deteriorating condition, have forced the squash team to relocate to the Center, where intercollegiate matches will occur on Thursday, Fridays and Saturdays during the months of October through March. The relocation of these squash matches to the Center will not result in any appreciable number of individuals using the Center. Squash neither attracts a base of people wishing to watch the matches, nor does the Center have any facilities to seat anyone wishing to watch a match. As each team has approximately 15 members, together with some additional coaches and support staff, the overall impact on the Center will not be noticeable. The only traffic resulting from this change would be the

---

6 Access to both Metrorail and Metrobus are conveniently located within

vans associated with each team and that will be parked in University facilities. According to B&D, these people will account for less than two percent of the average daily traffic into the Center. See B&D Report at 12.

Alumni and members of the President's Club presently are allowed to access the Smith Center, but not the Lerner Health and Wellness Center. Currently there are 86 President's Club members. Based on existing data, only 18% of the users of the Smith Center drive to the facility, with the remaining 82% arriving either by foot or by public transportation. See the Gorove Report. The data show that the 18% who drive are able to find adequate curbside parking, with 22nd Street being most often available. Id. These data are useful as use of the Smith Center is statistically similar to that of the Center and provides a good comparison.

VI. Reasons the University is Seeking Relief from the 1998 BZA Order

Based on its initial projections, now supported by empirical data, the University is asking the Zoning Commission to delete the condition limiting the classes of users and to modify the condition mandating the Center's closing hour. Three reasons underlie this request:

1. The Center currently operates at a level substantially below its capacity;

---

two blocks of the Center.

2. Other universities, with similar facilities in similar cities, use their facilities free of the conditions to which the Center currently is burdened;
3. Based on the numerous requests received by the University, significant demand exists for the University to open the Center to a larger universe of users, such as alumni, those who live and work in the Foggy Bottom/West End area, students, faculty and staff of other University campuses, guests of the foregoing and friends of the University.

If the BZA-imposed conditions are modified as proposed, the University will extend membership to a maximum of 3000 potential users, regardless of class. These individuals would be made up of University students, faculty and staff (regardless of campus), University officials, President's Club members, alumni, people who live and work in the neighborhood, and the guests of the foregoing. Importantly, one-third of these new members are intended to come from people who live and work of the Foggy Bottom/West End neighborhoods. Specifically, use privileges will be extended to the residents of St. Mary's Court, a senior community residence facility, and to the owners of the Remington Condominiums, both of which are located within 200 feet of the Center. Most of these 3000 potential members would be assessed a user fee. Currently, faculty and staff pay $295 a year for access, while Foggy Bottom students pay per semester on a per-credit-hour-registered basis. Study abroad students and students not currently registered for classes are not accorded user privileges.

The student fee is part of the overall fee that each student pays when registering for classes each semester and is not optional.

Currently, both the 17,000 (approx.) students of the Foggy Bottom campus and the 9,800 (approx.) faculty and staff members potentially have access to the Center. However, the University's user profile reveals that less than 2,500 of these 26,800 potential users actually use the Center on a weekday basis with no more than 1,600 accessing the Center on a weekend. The data compiled by both B&D and Gorove demonstrate that even if the zoning conditions are modified the revised user profile indicates that no adverse impact on either the Center or the surrounding community will be created by relieving the Center of the class restrictions. Likewise, the University's request to increase the hours of operation until 1:00 a.m. on all nights, except Saturday when it will continue to close at 10:00 p.m. has been analyzed and been found to be without an adverse impact. See B&D Report.

VII. Projected Usage of the Center if Relief is Granted

Should the Zoning Commission rule in the University's favor, the surrounding community will witness no significant increases in either traffic or number of users.

A. Increase In Users If This Zoning Relief Is Granted

B&D's study gathered the data necessary to project reasonably the user profile should zoning relief be granted. Based on the 3000 maximum number of new members, surveys of existing President's Club members and usage rates

at similar universities, B&D was able to project that building utilization for the Center would increase from less than 15% of capacity to 19% of capacity. See B&D Report at 8.

Relieved of the burdensome and useless restrictions, a typical day at he Center still will see the highest concentration of users during the hours of 5:00 p.m. to 7:00 p.m. with a peak accumulation of users at 358. Id. Such numbers still fall short of the Center's almost 2,000-person capacity. If weekly usage numbers are projected, Wednesdays remain the most popular day to visit the Center, when approximately 3,467 people are projected to visit. Id. Again, Sunday will see the smallest amount of visitors with only 1,243 people using the Center. Id. Even by adding potentially 3000 new memberships, B&D conclude that at any given time, community utilization of the Center will only account for 28% of the Center's users. Id. Such a number means that 73% of the Center's users will be the same students, faculty and staff that already have access to the facility. Id. If the usage numbers are projected on a monthly basis, the Center will still witness the majority of use coming during the school year, but students would still represent two-thirds of the Center's users. Id.

B. Increase in Traffic and Parking if Relief is Granted

Gorove's study also projects the impact on traffic flow and parking availability in the surrounding community, should the University's request be granted. The study gathered data directly from users of the facility and cross-referenced it against data gathered from both the Smith Center and similar

facilities run by other universities. Gorove conclude that the community would feel little, if any, impact from the proposed modification of the 1998 BZA Order. See Gorove Report at 13.

Gorove's analysis reveals that, with the requested zoning relief, the neighborhood still experiences peak traffic between the hours of 6:00 and 7:00 p.m. with 717 patrons entering and leaving the Center. Id. Peak accumulation within the Center still would occur at 6:00 p.m. with 358 users inside the Center. Id. Gorove estimates that 15% of the new users would drive to the facility. Id. Only 5% of these users drive to the Center solely to use the facility, the rest of the additional users will already be in the area for other reasons regardless of zoning conditions. Id. This information again is based on user surveys, existing data, and comparison to other facilities. Gorove determined that, due to the increased membership, traffic in the area, at peak times, would increase by approximately 32 cars, with approximately 30 of these vehicles searching for parking. Id. Gorove's research shows that the need for parking will be distributed evenly among seven streets and four parking garages. Id. Of these locations, it is projected that none will be used by more than 15% of the patrons searching for parking. Id. As only 4.5 of the new vehicles will search for parking on the same street, the community will not feel any impact from a modified zoning order.

Extending access to a broader group of individuals will bring some increase in pedestrian traffic to the Center. Gorove's data reveal that 77% of those who use the Center arrive by walking to it. Id. The peak hour increase

in pedestrian traffic resulting from new zoning changes would be 162 users an hour. Id. Based on actual user counts conducted by Gorove, the peak evening pedestrian traffic is found on G Street, with 317 people an hour traveling in either direction. Id. Given these numbers, Gorove determined that the sidewalks outside the Center could easily accommodate increase in pedestrian traffic. Id.

In sum, the research conducted by both Gorove and B&D confirms that the existing infrastructure is capable of handling the increased patronage that would result from the University's requests. Further, the surrounding community would not notice a substantive change in the amount of traffic coming, going or searching for parking around the Center. Nearby access to public transportation, the fact that many people will already be in the area for other unrelated reasons and the fact that a large portion of the new members live in the surrounding areas, all support the fact the community will not be burdened by this University request.

The University's request to modify the Center's closing hour condition also will not bring a significant amount of traffic to the area. The existing user profile shows that the majority of those using the Center late at night are doing so because they participate in intramural activities. See B&D Report. The constituency of these activities is made up entirely of the students who already have access to the Center. Thus, while these activities may go on longer than as is currently allowed, it is not projected that any additional traffic will result from this modification.

C. Comparison With Similar Facilities Of Other Universities

The requested amendments to the 1998 BZA Order would bring the Center in line with the manner in which other urban universities use their facilities similar to the Center. B&D's research looked at eight other universities to determine how these institutions govern facilities just like the Center. See B&D Report at 2. Campuses such as New York University, Tulane University, the University of San Francisco and DePaul University were examined to determine what the national standard is for university-run urban health and wellness centers.

The research shows that of the eight facilities, all of them allow alumni members and member guests to some degree. Id. Six of the eight facilities allow community memberships and most have longer hours that the Center. Id. Most of the schools open their facilities at 6:00 a.m. and close at either 11:00 p.m. or midnight. Id. Significantly, the Smith Center stays open until 1:00 a.m., and did so when it served as the University's only recreation facility. The rationale for these late hours is to provide students with a healthy alternative to drinking alcohol or staying out until the early morning hours. The national trend appears to be that college students stay up later at night and need positive options to occupy their time. B&D cite recent surveys of Dartmouth College that show over 50% of the students are up each night at 3:00 o'clock in the morning. Id. By providing an outlet for these students, at least until 1:00 a.m. on all nights except Saturday, the University hopes to provide more positive activities for these students.

Of the similar facilities B&D examined, the Center is the only facility that is open less than 100 hours per week. Id. Seven of the eight facilities open earlier than the Center and another seven of eight stay open later than the Center. Id. The Comparison to these facilities shows that a building utilization rate between 15 and 25% is not uncommon. The University predicts that the Center's utilization rate will increase to 19% should the modification be approved as requested.

The schools allowing community memberships cite three reasons for doing so:

1. Improving building utilization especially during non-peak hours;
2. Supporting the relationship between the school and the community. This relationship is referred to as the "town-gown" relationship; and
3. Enhancing programs offered in the facility by using the additional revenue to add new and better services and programs.

See B&D Report. Not only does the Center promote the health and well being of its users, but it also aids the University in attracting the best students, as more and more candidates are seeking universities that promote a physically active lifestyle. Id. Schools also benefiting from better ties with the local community just by offering access to facilities that would not otherwise exist. The schools offering such access also report that they do not provide on-site parking, as generally each community member lives and/or works in the area, so they either walk or ride public transportation to the facility. Id. By deleting the condition limiting the classes of users of the Center and modifying the

condition mandating a closing hour, the Zoning Commission would bring the Center in line with how other similar universities use their facilities and, hopefully, take a positive step towards improving the ties between the community and University.

VIII. Project Area

The Center is located in the R-5-D district in the southwest quadrant of the campus within a block of the Charles E. Smith Athletic Center, the University's Funger Hall, Townhouse Row Residences and a 700 bed dormitory that is currently under construction. The Pan American World Health Organization is across 23rd and G Streets from the Center. The Foggy Bottom Metrorail station is nearby as is the Kennedy Center, the U.S. Department of State and the American Red Cross.

IX. Conclusion

The University conceived the Center with the hope of granting access to its students, faculty and staff, community residents, alumni, guests, and friends of the University. As such, the University constructed an exciting state-of-the-facility that could meet its users' physical fitness needs.

The Center opened in 2001 and has experienced a user profile of less than 15% of capacity. Expanding use privileges to a broader group of users will not have an adverse impact on the use and enjoyment of neighboring

property for any reason. Expert evidence and testimony support this conclusion.

It is for these reasons that The George Washington University submits that it has met its burden of proof under the cited Zoning Regulations and is therefore entitled to the requested special exception relief.

Respectfully submitted,

Jerry A. Moore III
Arter & Hadden LLP
1801 K Street, N.W.
Suite 300L
Washington, D.C. 20006
(202) 775-7101

Exhibits

A

GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT

Application No. 16276 of the George Washington University, pursuant to 11 DCMR 3108.1 for a special exception under Section 210 for further processing under an approved campus plan for construction of a Health and Wellness Center in an R-5-D District at premises 2301 G Street, N.W. (Square 42, Lot 847).

HEARING DATES: October 1 and 15, 1997; and December 3 and 17, 1997

DECISION DATE: January 7, 1998

ORDER

PRELIMINARY MATTERS:

On November 25, 1997, the ANC 2A filed a Motion to Strike additional evidence filed by Applicant and to reject previous expert testimony. On November 29, 1997, the Columbia Park Tenants Association filed a Motion to Strike all revised expert testimony submitted by Applicant after the close of the record on November 10, 1997. The Board denied both Motions on December 3, 1997.

SUMMARY OF EVIDENCE:

1. This is the second application brought by the applicant seeking special exception approval to authorize the construction and use of a new Health and Wellness Center. The first application was brought in 1994 and was denied by the Board on November 2, 1994. As a consequence, applicant revised its plans and submitted a new application for the Board's approval.

2. The property that is the subject of this application is located at 700 23rd Street, N.W., on the northwest corner of the intersection of 23rd and G streets, N.W.. It is located within the George Washington University campus boundaries on Lot 947 in Square 42.

3. The site comprises 27,022 square feet of land area and is improved with a surface parking lot. It is irregularly shaped (L-shaped) with an approximately 160-foot long frontage on 23rd Street and a 232-foot long frontage along G Street. A 30-foot wide north-south alley abuts a portion of the site to the west (rear). A two-story parking garage and eight surface parking spaces are located immediately to the north of the site. Farther

north within Square 42 are located a 15-foot wide east-west public alley and Saint Mary's Church. Other improvements within Square 42 include St. Mary's Court housing for the elderly, a nine-story building, another parking lot (which is also the site of a proposed student residence facility) and three row houses, two of which are owned by the University.

4. The site is located along the western edge of the campus in an area designated in the campus plan for "Support with Residential". Across G Street to the south of the site (outside of the campus boundary) are located a nine-story structure and several privately owned rowhouses that are used principally for residential purposes. Immediately across 23rd Street to the east is Funger Hall, a seven-story classroom building. The Tompkins Engineering Building is also located across the street from the site. Diagonally across 23rd Street to the southeast of the site is the Smith Center, the intercollegiate sports facility for the campus.

5. The site is located in an R-5-D District which permits matter-of-right general residential uses of high density development, including single-family dwellings, flats, and apartments to a maximum height of 90 feet, a maximum floor area ratio (FAR) of 3.5, and a maximum lot occupancy of 75 percent. Relative to this application, a college or university that is an academic institution of higher learning, including athletic and other recreational facilities proposed to be located on the campus of a college or university, is permitted in an R-5-D District if approved by the Board of Zoning Adjustment.

6. The applicant is proposing to construct a four-story building with four underground levels, three of which would be used for parking. The proposed building would rise to a height of 80 feet off G Street. It would have a floor area ratio (FAR) of 2.63. The main entrance to the building would be along G Street. In addition there would be a pedestrian entrance from Lot 823, which the applicant has agreed to purchase from Saint Mary's Church. Lot 823 would be developed as an open space garden plaza. The plaza would consist of 6 surface parking spaces along the western boundary of the property. In addition, there would be a landscaped plaza and sitting area. The proposed landscaped plaza would increase the distance between the proposed center and the church to a total of 70 feet. Three levels of underground parking would be provided for the facility with an access ramp from G Street, NW. The garage would accommodate 140 to 145 attendant parking spaces, replacing the existing 105 space surface parking lot (76 self park and 29 stacked spaces). The proposed 6 surface parking spaces to be located on the plaza area, would be exclusively for the use of Saint Mary's Church. The building's three service delivery spaces would be provided in the garage.

7. The applicant stated that the primary purpose of the proposed Health and Wellness Center ("Center") is to serve the

recreational and fitness needs of the university population by increasing opportunities to engage in independent recreational activities and to expand formal recreational sports programming. Intercollegiate athletics will not be a part of programming, and space will not be used for any spectator events. No health care facilities or medical treatment regimens will be provided. The Center will provide a holistic approach to health and wellness with a wide array of "self-help" and trainer based programs and activities. During the school year, there will be opportunities for certain initiatives at no cost (low impact aerobics, exercise classes and wellness-related activities) for immediate neighbors of the University community on a "space as available" basis. Special memberships on a limited basis will be available to immediate neighbors on the Square. During the summer months, a summer membership program would be provided. Applicant contends the Center is to be a full fitness community resource.

8. The Center proposes to be open between the hours of 7:00 a.m. to 1:00 a.m. Monday through Friday; 11:00 a.m. through 8:00 p.m. Saturdays; and 1:00 p.m. to 11:00 p.m. Sundays. The peak hours of use for the Center are expected to be in the evening, with an average of 1,828 visits per day. The maximum number of visitors that may fill all of the spaces within the building simultaneously will be 457; of these 457, no more than 150 would be guests, i.e. defined as other than students, faculty and staff.

9. The applicant contends that the granting of this application would not adversely affect the present character of the surrounding area, nor will the intended use affect the future development of the surrounding area. The applicant also presented evidence and expert testimony to support its contention that the approval of this application will not have an adverse impact on neighboring property because of traffic, especially since most of the users will come from the existing campus population.

10. The D.C. Office of Planning (OP) offered evidence and testimony to support its recommendation that the special exception be granted, as it found that Center would be consistent with the approved campus plan; that the facility would not result in an increase in the number of students, faculty or staff; with the proposed project, the bulk and height of buildings on the campus would not exceed that which is permitted in the approved campus plan; and that the use and operation of the proposed facility would not impair the intent, purpose, and integrity of the zoning regulations for the R-5-D district.

11. The Advisory Neighborhood Commission 2A by resolution dated September 17, 1997 and by testimony at the public hearing, opposed the application. The ANC noted the following issues and concerns:

a. The Board should not consider the application until the alley closings upon which the application is based are

approved. The Board cannot approve a special exception contingent on closing of the alleys.

b. The program is incomplete in that it does not describe in sufficient detail the program to be conducted in the structure to which the ANC can meaningfully respond.

c. The proposed uses violate the approved campus plan.

d. The location of the means of approach and egress from the building, both vehicular and pedestrian, which are now proposed to be on G Street are not compatible with the adjacent neighborhood because they will spill the users of the proposed center onto residential streets outside the campus plan area, rather than within the campus. This, in turn will create an unreasonable noise burden on campus.

e. The occupancy limits will create traffic congestion that is an unreasonable burden on the neighborhood outside of the campus plan area.

f. There is no reason to waive the requirements for loading berths and loading platforms as required by Zoning Regulations and the failure to provide such facilities will further burden the surrounding area.

g. Construction of the facility will cause the University to exceed the student population maximum set forth in the campus plan.

h. The proposed structure will not be opened until the last year of the currently approved campus plan and may, if delayed in any way, not be opened until after the approval of the existing plan expires.

12. The Board received hundreds of letters of support from neighbors, residents, students, and organizations. The letters and the testimony stated that the application should be granted as the proposed use would be of great benefit to the community and is in compliance with the regulations.

13. Those in opposition to the application sent letters and testimony to the effect that the applicant does not meet any of the criteria for the relief granted, that the proposed relief would adversely affect the community by increasing noise, and traffic, and proposing instead that a more appropriate use for the site would be for student residential housing.

FINDINGS OF FACT:

Based on the evidence of record, the Board finds as follows:

1. The campus plan clearly anticipates an athletic facility

within its periphery such as the Health and Wellness Center that is proposed.

2. The anticipated use is not a major use. High usage buildings are specifically listed in the campus plan and this building is not one of them.

3. Students, faculty members, and staff of the Foggy Bottom campus of the university will not create a traffic impact in their use of the facility.

4. Offering use of the facility to anyone who is not a student, faculty member, or staff person from the Foggy Bottom campus, such as alumni, neighbors, and those from other campuses will create an adverse traffic impact.

5. The purpose of the facility is not to provide athletic uses for neighbors, alumni, or anyone who is not a student faculty or staff person from the Foggy Bottom campus.

6. There is no spectator space in the design of the facility, nor is the use of the facility intended for spectator events.

CONCLUSIONS OF LAW:

Based on the foregoing findings of fact and evidence of record, the Board concludes that the applicant is seeking a special exception under an approved campus plan for construction of a Health and Wellness center in an R-5-D District. The granting of such special exception relief requires a showing through substantial evidence that the application can be granted as being in harmony with the general purpose and intent of the Zoning Regulations and Map and that granting the application will not adversely affect the use of neighboring property in accordance with the Zoning Regulations and Map.

The Board concludes that it has accorded the views of ANC 2A the "great weight" to which they are entitled and the Board is of the opinion that the issues raised by the ANC and members of the community will be adequately addressed in the conditions to this order.

Finally, the Board concludes that the applicant has met the burden of proof. The Board concludes that the proposed Center would be in harmony with the general purpose and intent of the zone plan and would not adversely affect the use of neighboring property.

Based on the foregoing, the Board **ORDERS** that this application be **GRANTED, SUBJECT** to the following **CONDITIONS:**

1. Use of the facility shall be limited to the students,

faculty and staff of the Foggy Bottom campus only.

2. Operation of the facility shall end at 10:00 p.m., Monday through Saturday and at 8:00 p.m. on Sundays.

VOTE: 4-0 (Susan Morgan Hinton, Betty King, and Sheila Cross Reid; and Betty King to grant; Laura M. Richards to grant by absentee vote).

BY ORDER OF THE D.C. BOARD OF ZONING ADJUSTMENT

ATTESTED BY: Madeliene H. Dobbins
MADELIENE H. DOBBINS
Director

FINAL DATE OF ORDER: MAR 31 1998

PURSUANT TO D.C. CODE SEC. 1-2531 (1987), SECTION 267 OF D.C. LAW 2-38, THE HUMAN RIGHTS ACT OF 1977, THE APPLICANT IS REQUIRED TO COMPLY FULLY WITH THE PROVISIONS OF D.C. LAW 2-38, AS AMENDED, CODIFIED AS D.C. CODE, TITLE 1, CHAPTER 25 (1987), AND THIS ORDER IS CONDITIONED UPON FULL COMPLIANCE WITH THOSE PROVISIONS. THE FAILURE OR REFUSAL OF APPLICANT TO COMPLY WITH ANY PROVISIONS OF D.C. LAW 2-38, AS AMENDED, SHALL BE A PROPER BASIS FOR THE REVOCATION OF THIS ORDER.

UNDER 11 DCMR 3103.1, "NO DECISION OR ORDER OF THE BOARD SHALL TAKE EFFECT UNTIL TEN DAYS AFTER HAVING BECOME FINAL PURSUANT TO THE SUPPLEMENTAL RULES OF PRACTICE AND PROCEDURE BEFORE THE BOARD OF ZONING ADJUSTMENT."

THIS ORDER OF THE BOARD IS VALID FOR A PERIOD OF TWO YEARS MONTHS, UNLESS WITHIN SUCH PERIOD AN APPLICATION FOR A BUILDING PERMIT OR CERTIFICATE OF OCCUPANCY IS FILED WITH THE DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS.

ord16276/AZ

GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT

BZA APPLICATION NO. 16276

As Director of the Board of Zoning Adjustment, I certify and attest that on MAR 31 1998 a copy of the order entered on that date in this matter was mailed first class, postage prepaid to each party who appeared and participated in the public hearing concerning the matter, and who is listed below:

Jerry A. Moore, III, Esq.
Arter and Hadden
1801 K Street, NW, Suite 400K
Washington, D.C. 20006

Matthew S. Watson, Esq.
1701 Q Street, NW
Washington, D. C. 20009-2455

Bernard Mozer, Chairman
Advisory Neighborhood Commission 2A
c/o Saint Mary's Court
725 24th Street, N.W.
Washington, D.C. 20037

Dorothy Miller
Columbia Plaza Tenants Association
2440 Virginia Avenue, N.W.
Washington, D.C. 20037

Eleanor Becker, President
The Foggy Bottom Citizens Association
c/o The West End Library
24th and L Streets, NW
Washington, D.C. 20037

Madeliene H. Dobbins

MADELIENE H. DOBBINS
Director

DATE: MAR 31 1998



GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT

★ ★ ★

Application No. 16553 of the George Washington University, pursuant to 11 DCMR § 3104.2, for a special exception for the review and approval of the University Foggy Bottom Campus Plan – Years 2000-2010 under Sections 210 and 507. The boundaries are as follows: Pennsylvania Avenue on the north; 19th, H, 20th, and G Streets on the east; F Street on the south; and 23rd, G and 24th Streets on the west, and also includes a portion of Square 122 extending south of F Street along 19th Street, N.W. Within the campus plan boundaries, the property owned by the University is devoted to a variety of University uses, including but not limited to classroom, dormitory, library, research, office, support, assembly, athletic, and hospital purposes. These uses would be continued under the Campus Plan in a variety of existing and new buildings in the R-5-D, R-5-E, C-3-C, and SP-2 Districts: Square 39, Lot 803, Square 40, Lot 36, Square 41, Lot 40, Square 42, Lots 54 and 55, Square 54, Lot 30, Square 55, Lots 28, 854, and 855, Square 56, Lots 30 and 31, Square 57, Lots 55 and 56, Square 75, Lots 23, 33, 34, 41, 42, 46, 47, 858, 961, 863, and 864, Square 77, Lots 5, 59, 60, 845, 846, and 864, Square 79, Lots 63, 64, 65, 808, 853, 854, 861, and 862, Square 80, Lots 2, 26, 27, 28, 29, 42, 45, 46, 47, 50, 51, 52, 54, 55, 800, 811, 820, 821, 823, 824, 825, and 828, Square 101, Lots 58, 60, 62, and 879, Square 102, Lot 46, Square 103, Lots 1, 13, 27, 28, 33, 35, 40, 812, 813, 814, 816, 817, 818, 819, and 820, Square 119, Lot 26, Square 121, Lot 819, Square 122, Lots 824 and 825; these Squares are within the campus plan boundaries; Square 39, Lot 77, Square 40, Lot 79, Square 41, Lot 80, Square 42, Lot 101, Square 54, Lot 102, Square 55, Lot 103, Square 56, Lot 119, Square 57, Lot 121 (part only), Square 75, Lot 122 (part only).

HEARING DATES: April 26, 2000, September 13, and September 26, 2000

DECISION DATES: December 12, 2000 and February 13, 2001

PRELIMINARY MATTERS:

Advisory Neighborhood Commission (ANC) 2A was a party in this proceeding. The Board received requests for party status from the Foggy Bottom Association, the Monroe House Condominium Association, Stephen Mandelbaum, James McLeod, Dorothy Miller, Barbara Spillinger, and Maria Tyler. These requests were all granted.

FINDINGS OF FACT:

1. The George Washington University (hereinafter "University" or "Applicant") originally filed an application December 28, 1999 for review and approval of the George Washington University Foggy Bottom Campus Plan for Years 2000-2010. A revised proposal was filed April 12, 2000.

2. The boundaries of the George Washington University Foggy Bottom Campus encompass approximately 43 acres, generally extending from Pennsylvania Avenue on the north to F Street on the south and from 19th Street on the east to 24th Street on the west. Property within the campus boundaries is zoned R-5-D, R-5-E, SP-2, and C-3-C.

3. The campus is surrounded by high-density zoning, including C-3-C to the north, C-4 to the east, R-5-E and SP-2 to the south, and R-5-E to the west. The campus is also adjacent to the Foggy Bottom Historic District, located west of New Hampshire Avenue and zoned FB/R-3.

4. The University, which has been located at the Foggy Bottom campus for almost 90 years, currently owns approximately 85 percent of the area and has a stated goal to acquire all of the property within the campus boundary. The University also anticipates using property outside the campus plan boundaries for uses permitted as a matter of right under applicable zoning regulations. No changes to the existing campus plan boundaries are proposed in the 2000 campus plan.

5. The Applicant submitted a plan for developing the campus as a whole, showing the location, height, and bulk of all present and proposed improvements, as required by 11 DCMR § 210.4.

6. The proposed campus plan anticipates:

   (a) adding approximately 950,000 square feet of gross floor area, including 874,000 square feet within the residentially zoned area of the campus, to meet the need for new facilities;

   (b) a floor area ratio (FAR) of 3.47, within the allowed maximum of 3.5 FAR;

   (c) student headcount of 20,000 and corresponding full-time equivalent (FTE) count of 16,553;

   (d) faculty headcount of 2,236 and corresponding FTE count of 1,550;

   (e) staff headcount of 10,293 and corresponding FTE count of 9,000;

   (f) maintenance and further development of the open space system and pedestrian network;

   (g) mid-block crossings to reinforce the pedestrian network and provide a safer pedestrian environment;

   (h) urban design enhancements to identify the campus perimeter;

   (i) 2,700 to 3,240 off-street parking spaces; and

(j) encouragement of alternative modes of transportation by students, faculty, staff, and visitors to minimize campus traffic and the impact on neighborhood streets.

7. The Applicant met repeatedly with community representatives in 1999 to discuss campus plan issues, and also participated in discussions facilitated by the Office of Planning in March and April 2000. The University subsequently filed a new proposed campus plan in April 12, 2000 that amended the original filing by:

(a) identifying two sites on campus for the construction of new residence halls;

(b) stating a long-term goal of housing 80 percent of full-time undergraduate students in University-owned or –controlled housing;

(c) stating a commitment to a new communication process with the community, including regular quarterly meetings;

(d) proposing enhanced policies regarding the conduct of University students both on campus and within the larger community; and

(e) proposing an enhanced Transportation Management Plan to maximize the use of public transportation.

Exhibit No. 95 at 9.

8. The proposed 2000 campus plan anticipates the addition of less gross floor area than was approved in the 1985 campus plan (*see* BZA Order No. 14455) and does not propose any change in student, faculty, or staff headcounts or the FTE equivalents for students and faculty, while the proposed staff FTE represents a reduction from the 1985 plan.

9. The University estimates that 2,775 undergraduates are not housed in University housing. Of those, approximately 1,103, or 40 percent, live in Foggy Bottom (zip codes 20006 and 20037), 543 live elsewhere in the District of Columbia, 718 live in Virginia, and 411 live in Maryland. Exhibit No. 230 at 2.

10. The Applicant testified that the University will require all freshmen and sophomore students to live in on-campus housing by 2002, except for those who are commuters, are married, have children, or have disabilities or religious beliefs inconsistent with residence hall life.

11. The University proposed to provide housing by the end of 2005 for at least 70 percent of its full-time undergraduates in University-owned or -controlled housing, toward a long-term goal of housing 80 percent of full-time undergraduate students in University-owned or -controlled housing. The Applicant stated that the percentage requirement would act as a "soft cap" on undergraduate students, since the "rough parity" between the number of beds and full-time undergraduates would limit increases in the number of undergraduates.

12. The Applicant's revised campus plan proposal provides for a total of 1,350 new beds on campus, subject in some cases to contingencies. The total stock of on-campus University beds would potentially increase by approximately 40 percent, from 3,519 to 4,869. The University proposed to provide additional on-campus housing on three sites:

    (a) 200 beds on Square 103;

    (b) 650 beds on Square 80, provided that the District of Columbia transfers property it owns on that site to the University for redevelopment including new space for the School Without Walls, or alternatively, approximately 288 beds if the property is not transferred; and

    (c) 500 beds on Square 54, provided that the University is able to secure approval of a planned unit development (PUD) and rezoning of the site to C-3-C, and provided that the University is able to secure the necessary permits.

    Transcript (Tr.), September 13, 2000 at 144.

13. The Applicant proposed to provide an additional 550 beds immediately off-campus within a designated Housing Opportunity Area; that is, approximately 200 beds on Square 122 and at least 350 beds on Square 43. The Applicant defined the proposed Housing Opportunity Area as: (a) all areas on campus, (b) existing off-campus residential facilities owned or controlled by the University as of November 8, 2000, (c) properties located in Squares 43, 58, 81, and 122, and (d) property located outside the "Foggy Bottom Area," that is, the area bounded by 19th Street, E Street, Rock Creek Park, and Pennsylvania Avenue, N.W., not including the Housing Opportunity Area. Tr., September 13, 2000 at 146-147.

14. The University suggested that, as an incentive, any additional housing constructed on campus after approval of the campus plan should not count toward the maximum FAR limiting the bulk of all buildings on campus.

15. The University also pledged not to purchase residential facilities in Foggy Bottom (excluding certain areas) for dormitory use for a period of five years or until the 70 percent housing goal was reached. Exhibit No. 196

16. The Foggy Bottom campus is served by two Metrorail stations – the Foggy Bottom/GWU station on-campus at 23rd and I Streets, and the Farragut West station located near the campus at 18th and I Streets, N.W. – as well as three Metrobus routes. The University provides a shuttle service connecting the Foggy Bottom and Mount Vernon campuses and the satellite parking at the Kennedy Center.

17. The Applicant's proposed Transportation Management Plan is intended to further encourage the use of public transportation by students, faculty, staff, and visitors to the Foggy Bottom campus. The University established a target of 60 percent transit use by faculty and staff and a five percent target for carpooling and vanpooling.

18. The Zoning Administrator, by memorandum dated March 23, 2000, submitted the results of a count of parking spaces on the campus, reporting that the current parking inventory on campus is 2,632 spaces. (*See* Exhibit No. 45.) The University proposed to increase the minimum parking inventory to 2,800 spaces. Exhibit No. 196.

19. The Board finds that parking spaces located outside that campus plan boundary should not be counted toward the campus parking inventory because the record reflects that the 150 spaces leased by the University at the Kennedy Center have not been well-utilized and thus do not satisfy the demand for parking on-campus. The Board also finds that 2,800 parking spaces on-campus will be sufficient to mitigate potential adverse impacts on neighboring property.

20. The Office of Planning (OP) submitted several reports on the Applicant's campus plan. OP opposed approval of the proposed campus plan as filed, but ultimately supported approval subject to conditions necessary to protect the neighborhoods surrounding the University. According to OP, the conditions of approval should be designed to (a) protect adjacent communities that absorb a disproportionate share of students, university facilities and related uses and activities, (b) ensure that the West End is included as an adjacent community in need of protection from future University expansion and student growth, (c) provide the University with the flexibility to determine sound strategies for encouraging students to look at housing options in other areas of the city or region, (d) allow the University to further its academic mission, and (e) incorporate an enforcement mechanism that would give the University adequate incentive to follow through on its commitments. Exhibit No. 239 at 5, 6.

21. For purposes of its reports, OP defined the Foggy Bottom Area – that is, the area where OP believed that the University should not acquire off-campus housing – as the area bounded by 19th Street, E Street, Rock Creek Park, and N Street, N.W., except for property zoned C3 or C4, the campus plan area, and the Housing Opportunity Area. OP defined the Housing Opportunity Area as (a) existing University residential facilities, (b)

properties currently owned by the University on Squares 43 and 122, and (c) any property located within the campus plan boundary. Exhibit No. 239 at 8.

22. In its April 21, 2000 report, OP indicated that the proposed campus plan had "many positive points" but two related issues concerning neighborhood impacts remained unresolved: (1) the physical expansion of the University beyond the campus plan boundary to meet student housing needs, and (2) the impact on nearby communities of students not in University-owned housing who put added pressure on the local housing market. Seeking to ensure that a policy of no or very limited impacts on the fragile Foggy Bottom and West End neighborhoods was reflected in the approved campus plan, OP identified five issues of concern:

(a) Projected enrollment increases will inevitably put pressure on the neighborhoods surrounding the University, and the Applicant's guarantee to provide housing for 60 percent of undergraduates would not adequately mitigate the full impact of the pressure.

(b) There is presently insufficient housing located inside the boundaries of the campus plan, new housing will be needed, and if the University continues to purchase land outside the campus plan boundaries and the number of students living in the small, constrained Foggy Bottom community continues to increase, the residential community will reach a "tipping point" where the Foggy Bottom community simply transforms into a "University area."

(c) Information about the undergraduate population is critical to determining present and future impacts on the surrounding residential community.

(d) While the University provides significant economic benefits, there is concern about the trend of removing land from the tax rolls for university purposes.

(e) No agreement currently exists or is included in the proposed campus plan that would provide binding, verifiable assurances that expansion into the Foggy Bottom/West End community would not occur in the future.

Exhibit No. 138 at 2-3.

23. In its supplemental report submitted September 8, 2000, OP recommended denial of the proposed campus plan due to its nonconformity with the requirements of Section 210 of the Zoning Regulations. However, OP also proposed two sets of recommendations that, in its view, would bring the campus plan into conformity with Section 210. One approach, which OP initially designated its preferred recommendation, included (a) establishment of a baseline number of students in the Foggy Bottom Area, (b) requiring the University to establish a program that would maintain or lower that baseline number, (c) implementation of strict enforcement mechanisms to provide certainty for the community and motivation for the University in complying with its baseline obligations, and (d) requirements for construction of additional housing on Squares 54 and 80. OP

testified that the preferred set of recommendations would solve cumulative student impacts in Foggy Bottom while also discouraging the University from acquiring residential property for dormitory use. However, OP also noted that its preferred approach might require legislative action to avoid any possible violation of the District of Columbia Human Rights Act, D.C. Code § 1-2501, *et seq.* OP subsequently decided that the baseline approach would "introduce too much complexity" in the proceeding. Exhibit No. 90 at 2, 8-9; Exhibit No. 239 at 5-6.

24. OP's second set of recommendations was based on specific elements of the Applicant's proposal with modifications including (a) a requirement to provide one additional unit of housing for each additional full-time undergraduate student above the University's 1999-2000 enrollment figures, (b) building in an enforcement mechanism if the University fails to meet its commitments, and (c) restricting the University's request to develop off-campus housing on property in which the University owns an interest. Exhibit No. 90 at 2.

25. OP testified that the University's expansive definition of a "Housing Opportunity Area" rendered the campus plan boundaries "virtually meaningless" from the perspective of neighborhood preservation and enhancement. OP also objected to the Applicant's proposal to exclude the campus plan area from the definition of the Housing Opportunity Area, stating that the University must bear the burden of further expansion. *Id.* at 20.

26. According to OP, the Applicant's commitment to house 70 percent of its undergraduate students on campus by 2005 was "no real solution to the dangers posed to the further viability of the Foggy Bottom and West End neighborhoods." OP testified instead that any means used to protect the surrounding neighborhoods "must be based on the actual source of threat to those neighborhoods: continuing University expansion without any concomitant increase in on-campus student housing." *Id.*

27. The Department of Public Works (DPW), in its report to the Board, concluded that one of the best and most effective ways to minimize traffic to and from the campus is to provide on-campus housing for students presently living off-campus. According to DPW, the second most effective way to decrease traffic volume to and from the campus is to encourage the use of the existing public transportation conveniently located throughout the campus. Exhibit No. 138, DPW Report, April 21, 2000 at 3.

28. DPW supported much of the Applicant's proposed Transportation Management Plan, including the expansion of the shuttle bus service between the Mount Vernon and Foggy Bottom campuses. However, DPW also recommended that the University should seek to increase the use of transit and bicycle by students, staff, and faculty commuting to and from the campus. *Id.*

29. The Board concurs with the findings and recommendations of DPW, and finds that the Applicant's proposed Transportation Management Program is adequate to address any potential adverse impacts associated with traffic.

30. ANC 2A recommended denial of the campus plan application. In its report, dated April 17, 2000, the ANC contends that the proposed campus plan "largely ignores the adverse impacts that the University has on surrounding neighborhoods. . . ." The ANC objects especially to the University's "failure to build sufficient dormitories to house its students within the campus plan boundaries and [its] concomitant practice of acquiring properties outside the campus plan boundaries for student housing" as well as "the traffic and parking impacts that spill into the neighborhoods outside the campus plan boundaries." ANC Report at 2.

31. ANC 2A argues that housing large numbers of students is an institutional university use that is not compatible with a viable, permanent residential neighborhood, because 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. Accordingly, ANC 2A reiterated its "long-standing policy and goal" that the University 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. *Id.* at 3-4.

32. The ANC asserts that the University's designation of two small sites on campus for the construction of dormitories is not sufficient to alleviate the effects of housing large numbers of students outside the campus plan boundaries, particularly in light of the University's projected increase in student headcount by 3,000 over the current level. The ANC stated that additional sites within the campus plan boundaries should be designated for dormitories, naming Square 54, the north half of Square 103, the southwest quadrant of Square 79, and the southeast quadrant of Square 101. *Id.* at 8.

33. By resolution passed unanimously at its April 12, 2000 public meeting, ANC 2A contended that the University has heavily increased enrollment of full-time students without commensurate available dormitory space, creating "an environment where students are forced to seek housing in the surrounding residential neighborhood, resulting in the displacement and flight of tax-paying residents." The ANC also objected to the University's purchase of properties outside the campus plan boundaries "without provision for review or regulation of its acquisitions." Finding the campus plan unacceptable as submitted, the ANC concluded that student enrollment should 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." Exhibit No. 113.

34. The Foggy Bottom Association (FBA) also urged the Board to deny the application, stating that the institutional policies of the Applicant have been very damaging to the Foggy Bottom/West End area over the term of the 1985 plan, and that the area would not survive as a residential community if the same policies are permitted in the future. According to the FBA, the core problem has two main causes: (1) the University has had no meaningful constraint on enrollment and (2) there has been no requirement to house added students on campus, and the University has largely not done so. The FBA testified

that, as a result, student renters have "flooded the private market, turning apartment houses into *de facto* dorms and row houses into informal frat houses," and the University has bought about three dozen properties outside the campus plan boundaries but within Foggy Bottom/West End, mostly to house students.

35. The FBA testified that the Applicant's housing proposals "are completely inadequate," particularly because an undifferentiated student cap of 20,000 does not guarantee against additional students living in Foggy Bottom/West End, and because the Applicant made no unconditional commitment to add any on-campus dormitory rooms. *Id.* at 5.

36. The Board received numerous letters in support of the Application. The letters generally cited the important role of the University in the District's economy, its commitment to the Foggy Bottom neighborhood, and contributions made by the University and its students and faculty, for example, in serving as volunteers and providing assistance to local businesses, churches, and neighborhood groups. Other letters in support, written by residents of Foggy Bottom, described advantages of living near the University, including landscaping and other open space improvements, opportunities to audit classes and use the University library, and the proximity to students who enliven the neighborhood.

37. The Board also received numerous letters in opposition to the proposed campus plan. Many residents of Foggy Bottom expressed concern about the University's continued expansion into the residential neighborhood. Other letters cited concerns relating to traffic and insufficient parking in the surrounding neighborhood associated with the University. Opponents of the proposed campus plan generally stated that the Applicant should not be permitted to increase its undergraduate enrollment, because the University's expansion off-campus has displaced taxpaying residents, jeopardized the residential character of the Foggy Bottom and West End neighborhoods, and harmed the District of Columbia by removing properties from the tax rolls.

38. The Board gives great weight to the testimony of the Office of Planning and the affected ANC and finds that the number of students at the Foggy Bottom campus is having an adverse impact on the surrounding neighborhoods because of the displacement of permanent, non-student housing as a result of the lack of sufficient on-campus housing and the University's acquisition of property off-campus to increase the supply of dormitory beds.

CONCLUSIONS OF LAW AND OPINION:

The Applicant is seeking a special exception, pursuant to Sections 210 and 3104 of the Zoning Regulations, for approval of an updated campus plan for a period of 10 years. The Board is authorized to grant a special exception where, in the judgment of the Board based on a showing through substantial evidence, the special exception 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 in accordance with the Zoning Regulations and Zoning Maps. D.C. Code § 5-424(g)(2), 11 DCMR § 3104.1.

The Zoning Regulations specify that use as a university in a residential zone 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. 11 DCMR § 210.2. In reviewing and deciding a campus plan application, the Board must consider relevant policies of the District Elements of the Comprehensive Plan. 11 DCMR § 210.7. The Ward 2 element of the Comprehensive Plan provides that:

> 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.

10 DCMR § 1327.1(b). The Comprehensive Plan also provides that:

> . . . 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.

10 DCMR § 1358.1.

The Board concludes that the Applicant has met its burden of showing that the university use will not be objectionable to neighboring property. However, the Board concludes that it is necessary to condition its order to minimize any impacts from existing conditions and any potential impacts from planned future development.

The Zoning Regulations specify that the number of students is one factor that the Board must take into account when assessing whether a university use in a residential zone is likely to become objectionable to neighboring property. *See* 11 DCMR § 210.2. In this case, the Office of Planning, the affected ANC, and parties in opposition have asserted that the number of students using the Foggy Bottom campus has become objectionable to the surrounding neighborhoods because of the lack of sufficient on-campus housing and because of the University's acquisition of property off-campus to increase the supply of dormitory beds. The Board concludes that both factors – the insufficient supply of on-campus housing and expansion of university use through off-campus acquisition – are likely to exacerbate objectionable impacts on neighboring property unless steps are taken to prevent that outcome. The Board notes especially the concerns of the Office of Planning about the continued viability of the Foggy Bottom and West End neighborhoods, as pressures associated with University expansion threaten their livability and residential character.

Therefore, the Board concludes that approval of the 2001 campus plan must be conditioned on measures that will allow the University to operate and improve its facilities without creating adverse impacts on neighboring property. For purposes of these conditions, the Board adopts the following definition of the Foggy Bottom/West End Area: the area bounded by E Street on the south, Rock Creek Park on the west, N Street on the north, and 19th Street on the east, excluding the campus plan area. The Foggy Bottom and West End neighborhoods are the communities immediately affected by the presence and impacts of the University.

As a condition of approval of the 2001 campus plan, the University must limit enrollment of full-time undergraduate students to that number enrolled as of February 13, 2001[1] ("benchmark enrollment") until the University has available on-campus student housing in an amount that will house 70 percent of its undergraduate population. Until the 70-percent target is reached, the University will not be granted a special exception for any non-residential use on campus. Once the University is able to offer on-campus housing to at least 70 percent of full-time undergraduates, enrollment may be increased only if additional on-campus student housing is available for each additional undergraduate student to be enrolled.

The 70-percent on-campus housing condition is intended to provide the impetus for the Applicant to encourage more undergraduates to live within the boundaries of the campus plan and to discourage the University from seeking to acquire additional property outside the campus plan boundaries in the surrounding neighborhoods for undergraduate student housing. This condition is a performance standard that gives the University significant flexibility in deciding how to use its property within the campus plan boundaries, rather than mandating the development of dormitories in certain locations on campus.

The performance standard approach is somewhat similar to the "preferred recommendation" that OP originally proposed but later withdrew in light of its complexity. Both measures are intended to increase the undergraduate population living within the area defined by the campus plan boundaries, and thereby minimize the adverse impacts on surrounding neighborhoods associated with numbers of students living there and the potential for University expansion by acquiring property outside the campus plan boundaries. The 70-percent on-campus condition eliminates much of the complexity inherent in OP's recommendation, which would have required a determination of the number of students living off-campus in Foggy Bottom. Instead, any future increases in enrollment will be tied to the on-campus undergraduate population as a percentage of total full-time undergraduate enrollment, which should not be unduly difficult for the University to calculate.

The Board concludes that the issues and concerns of OP and ANC 2A are adequately addressed by the 70-percent undergraduate on-campus housing condition, which requires future University growth to occur in conjunction with future increases in on-campus housing, thereby minimizing the incentive to acquire additional properties outside the campus plan boundary and decreasing the threat of creating additional pressures on the permanent housing stock in the Foggy Bottom/West End Area. The University's implementation of a new housing program to

[1] February 13, 2001 was the date on which the Board voted to approve this application at a public meeting. This condition and all other set forth in this Order were specifically approved.

encourage those students not living on campus to find housing outside the Foggy Bottom/West End Area will also reduce the impact of students there, as will the condition proposed by the Applicant that all freshmen and sophomores be required to reside on campus.

The Board concludes that the boundaries of the campus plan area should be revised to reflect more accurately those areas where the University already owns and plans to develop University residential facilities. Accordingly, the southern portion of the campus plan boundary should be redrawn to encompass certain University-owned properties located outside of and adjacent to the southern boundary as previously drawn. The campus plan boundary shall be redrawn to include within it the Dakota at 2100 F Street in Square 81; 2201 Virginia Avenue (Riverside Towers), addresses 518 through 526 22nd Street, in Square 58; addresses 2006 and 2008 F Street in Square 58; and the University-owned property in Square 43. Especially in light of the University's plans to develop housing on property it owns in its proposed Housing Opportunity Area, the Board notes that inclusion of portions of certain squares immediately adjacent to the southern edge of the previous campus plan boundary will assist the University in meeting the 70 percent on-campus housing requirement. The previous campus plan boundary is otherwise unchanged.

The campus plan boundaries were redrawn in 1988 to exclude Square 43 on the basis of the Board's belief that "the removal of Square 43 [is] essential to the preservation and enhancement of residential uses in the Foggy Bottom neighborhood." BZA Order No. 14455 at 34. In that case, the Office of Planning testified in favor of excluding Square 43 from the campus plan area because implementation of the University's policy to acquire all property within its boundaries created a need to protect residential uses within the boundary from elimination. *Id.* at 16. In light of the University's plans to develop additional housing on the property it owns there, the Board now concludes that the Applicant's use of Square 43 is essentially a university use and that the square should be included within the boundaries of the campus plan.

The Applicant proposed, and OP concurred, that to encourage construction of on-campus dormitories, any additional housing constructed on-campus after approval of the campus plan should not count toward the maximum FAR limiting the bulk of all buildings on campus. The Board cannot approve this recommendation because it would have the effect of increasing the FAR cap for the campus – something only the Zoning Commission can do by means of an amendment to the Zoning Regulations or through the PUD process. *See* 11 DCMR § 402.4.

The Board accorded the issues and concerns of ANC 2A the great weight to which they are entitled. In doing so, the Board fully credited the unique vantage point that the ANC holds with respect to the impact of the University and its proposed campus plan on their constituents. The ANC adopted a resolution stating that the proposed campus plan should not be approved and describing adverse impacts the ANC believes the University has on the Foggy Bottom/West End neighborhoods. The Board concludes that conditional approval of the campus plan adequately addresses the issues and concerns of the ANC and will minimize the potential adverse impact of the University on surrounding residential neighborhoods.

The Board notes that the ANC and other community representatives testified that the University's acquisition of properties outside the approved campus plan boundary should be restricted. However, as the Board has previously concluded, "the reach of § 210 does not extend

beyond a campus to a use otherwise permitted." BZA Order No. 16507 at 7. That is, the Zoning Regulations do not prevent the University from acquiring and using property anywhere outside the campus plan boundaries so long as that use is consistent with all applicable zoning restrictions, including matter-of-right uses. *See also Spring Valley Wesley Heights Citizens Ass'n v. District of Columbia Board of Zoning Adjustment*, 644 A.2d 434 (1994).

Accordingly, it is **ORDERED** that the application is **GRANTED SUBJECT** to the following **CONDITIONS**. For the purpose of these conditions, the term "campus plan boundary" means the campus plan boundary established by the Board in Condition No. 2. The term "Foggy Bottom/West End Area" means that area bounded by 19th Street, E Street, Rock Creek Park, and N Street, N.W., excluding the campus plan area.

1. The Applicant's proposed campus plan is approved until June 30, 2009, subject to the following conditions intended to mitigate those adverse impacts identified in this Order and any adverse impacts potentially arising from the location of a university use in a residentially zoned district, or until such time prior to June 30, 2009 as the Zoning Commission determines that conditions warrant submission of an updated campus plan.

2. The campus boundary as depicted in the plan offered by the Applicant is modified and expanded to encompass certain University-owned properties located outside of and adjacent to the southern boundary as previously drawn. The campus plan boundary shall be redrawn to include within it the Dakota at 2100 F Street in Square 81; 2201 Virginia Avenue (Riverside Towers), addresses 518 through 526 22nd Street, in Square 58; addresses 2006 and 2008 F Street in Square 58; and the University-owned property in Square 43.

3. The University shall work with community representatives to form an Advisory Committee for the purpose of fostering consistent communication between the University and the Foggy Bottom/West End community, discussing issues of mutual interest and proposing solutions to problems that exist or arise in implementing the approved campus plan. It is recommended that the Advisory Committee consist of 10 members: five members to be selected by the University and five members chosen by ANC 2A, the Foggy Bottom Association, and the West End Citizens Association. The Advisory Committee should schedule quarterly meetings open to the public, and should keep minutes of each meeting. Upon request, the University will provide timely data relevant to campus plan issues to the Advisory Committee, provided that the data is not confidential or overly burdensome to produce. Decisions regarding the operation of the Committee should be made jointly by the University and the community.

4. The University shall notify the Office of Planning, ANC 2A, and the Advisory Committee of its development plans for a specific site on campus following approval of the proposal by appropriate University committees and the University's Board of Trustees and prior to preparation of final, detailed plans and specifications.

5. The University shall incorporate the following land-use policy into the 2001 Campus

Plan: University uses and structures (including the location of any means of approach to and egress from the structure) will be located to avoid adverse impacts on non-University properties, especially those residential properties on the periphery of the campus.

6. The University shall incorporate the following design policy into the 2001 Campus Plan: The height, bulk, and design (including the location of any means of approach and egress) of future University structures will be compatible with and sensitive to the height, bulk, and design of adjacent non-University-owned structures.

7. The University shall prepare a detailed streetscape plan applicable to the entire campus. The plan shall include, among other elements, a discussion of the installation of sign pylons, and it shall be developed in conjunction with the Office of Planning, the Department of Public Works, and the Advisory Committee. Upon completion, the plan shall be submitted to the Board for review.

8. Student enrollment (headcount) over the life of the plan shall not exceed 20,000 students and the student full-time equivalent shall not exceed 16,553. The number of full-time equivalent faculty and staff shall not exceed 1,550 and 9,000 respectively, while the headcounts for faculty and staff shall not exceed 2,236 and 10,293 respectively.

9. The University's undergraduate population shall be capped at the number of full-time students enrolled as of February 13, 2001 ("benchmark enrollment").[2] The cap will remain in place, and only applications for residential special exceptions may be processed, until the University has available on-campus student housing in an amount that will house 70 percent of its undergraduate population. For purposes of this condition, a special exception requested for an on-campus mixed-use project that includes residential use will be considered residential if the residential use occupies at least 50 percent of the FAR of the proposed project (exclusive of unoccupied roof structures). Once the Zoning Administrator certifies to the Office of Zoning that this level of on-campus housing has been achieved, (1) the University may increase enrollment only if additional on-campus student housing is available for each additional undergraduate student to be enrolled, and (2) applications for special exceptions for both residential and non-residential projects may be processed. For purposes of this condition, the term "full-time undergraduate student" does not include part-time or evening students, students who are married or have children, students with disabilities or religious beliefs inconsistent with residence hall life, or students who commute from outside the District of Columbia.

10. Commencing in the Fall 2001 semester, the University shall require all full-time freshmen and sophomore students to reside in University housing located within the campus boundary established by the Board, to the extent that such housing is available. The University may exempt students who commute, are married or have children, or have disabilities or religious beliefs inconsistent with residence hall life. Prior to the Fall 2003

[2] February 13, 2001 was the date on which the Board voted to approve this application at a public meeting. This condition and all other set forth in this Order were specifically approved.

semester, housing commitments made to current University students may be taken into account when determining the amount of housing available.

11. The University shall institute a program to provide its students who are eligible to live off-campus with information about housing opportunities outside the Foggy Bottom/West End Area. The University shall provide this information using local licensed brokers or apartment locators as appropriate, and shall also provide information on the availability, reliability, and accessibility of public transportation between the campus and the housing opportunities. For those locations that are not Metro accessible, the University shall explore the use of a shuttle bus service to its campus for areas that the University determines contain a critical mass of University students, and shall report its criteria and findings to the Advisory Committee annually, at the beginning of each Fall semester.

12. The University shall expand the use of disciplinary interventions to acts of misconduct by students living off-campus in the Foggy Bottom/West End Area, even if the students are not in properties owned or controlled by the University. The University shall act on incident reports by residents, the ANC, community associations, building management, building association boards, University security officers, and police. The University shall develop an outreach program with neighboring apartment buildings to educate management companies and tenant associations on the University's disciplinary program and its reporting requirements to facilitate effective use of its program. Additionally, subject to applicable law, the University shall permit management companies to obtain University clearances for student applicants for apartments to prevent students who are not eligible for the University's on-campus housing due to conduct violations from obtaining units in neighboring apartments.

13. The University shall maintain and publicize a hotline line available 24 hours per day, seven days per week to receive calls about student conduct issues and safety and security concerns. The University shall maintain a log of all calls received and all actions taken, including all referrals made. The University shall maintain its Crimes Tips Hotline (presently 994-TIPS), where calls can be made anonymously to a recorded "tip" line. Calls needing a more immediate response shall be directed to the University police (presently 994-6110) 24 hours per day, seven days per week. The University police will aid off-campus complainants in obtaining assistance from the Metropolitan Police Department. Reports of improper off-campus student conduct will also be referred to the appropriate University departments for their attention.

14. The University shall promptly establish a mandatory program for its students that will address "good neighbor" issues, educating students about appropriate conduct in the off-campus community.

15. The University shall implement measures to minimize adverse impacts associated with parking and traffic.

    a. Support of Mass Transit: The University shall institute the Metrochek program offered by the Washington Metropolitan Area Transit Authority (WMATA) to

allow employees to pay for public transportation costs on a pre-tax basis, with a target date for implementation of Spring 2001. In an effort to increase Metro ridership among the student population, the University shall implement an introduction to public transportation program for incoming students that includes provision of WMATA's "SmarTrip" cards to incoming students as of the Fall 2001 new student orientation. The University will work with Metro to schedule a future SmarTrip "carding event" starting in Fall 2001 at various locations around campus to provide additional information about public transportation to the University community.

b. Parking: The University shall provide at least 2,800 off-street parking spaces within the campus boundary. Any off-street parking obtained by the University at a location outside the campus plan boundaries, including the University's off-campus spaces located at the Kennedy Center, shall not be counted toward the 2,800 minimum for purposes of satisfying this condition. The number of off-street parking spaces required to be provided within the campus boundary may be increased in any subsequent special exception order issued pursuant to this plan if necessary to mitigate the adverse impact of the approved uses on parking. The University shall monitor its utilization of University parking lots to determine usage patterns and to conduct an ongoing assessment of parking needs.

c. Community Parking Program: In addition to its on-campus parking inventory, the University maintains parking facilities in certain off-campus properties. Members of the Foggy Bottom community have expressed an interest in exploring the creation of a parking program pursuant to which non-student residents of the Foggy Bottom community would be permitted to park in University properties. The University shall provide contracts for parking to residents of the Foggy Bottom/West End Area on a space-available basis. The location of such spaces will be determined by the University. Levels of and changes in availability will be reported to the Advisory Committee on request.

d. Notice: The University shall notify all affected property owners or occupants in a timely manner of the occurrence of any temporary street closing necessary to accommodate University-related functions.

e. Student vehicles: The Applicant, through its Office of the Registrar, shall maintain an accurate record of the license plate numbers of motor vehicles kept by students, updated annually at the beginning of the Fall semester. The Applicant shall direct the students to register their vehicles in the District of Columbia, or obtain a reciprocity sticker, and shall consult with the D.C. Department of Motor Vehicles to determine whether such registration is completed or such stickers are obtained. The Applicant shall withhold parking privileges to students who do not comply with D.C. registration or reciprocity requirements. Failure to register student vehicles in the District or to obtain reciprocity stickers shall constitute a violation of the Code of Student Conduct.

16. Within six months of the effective date of this Order, the University shall prepare an updated comprehensive management plan to address traffic and parking associated with attendance at events on campus that are attended by a significant number of persons not normally associated with the University and the campus, who come to the campus for the specific purpose of attending the event. The management plan shall be maintained by the University, made available to the public, and submitted to the Advisory Committee, and shall include the following:

    a. Measures to schedule events at times that reduce conflicts with other traffic and other demands for parking.

    b. Measures to discourage travel by private automobile and encourage travel by public transportation.

    c. Measures to encourage persons who drive to park in commercial or University parking garages.

    d. Any other specific measures to address parking demand and decrease vehicular traffic in the surrounding Foggy Bottom/West End Area.

17. Starting in the Fall 2001 registration process, the University shall gather information about the local addresses of the full-time undergraduate population. The University shall update the information annually. The University shall annually provide the Advisory Committee with an audited count of the number of full-time undergraduate students residing in the Foggy Bottom/West End Area outside the campus plan boundaries, and shall include the information in each application for a special exception pursuant to the approved 2001 Campus Plan.

18. Within 90 days of the effective date of this Order, the University shall revise the Campus Plan to reflect changes mandated by the above-stated conditions. The revision shall include a revised map of the campus, with the following specifications: The map shall show the campus boundaries and the number of each square within the boundary, and shall identify the approved uses for each square; the map shall be legible and not require color for graphic clarity. Upon completion, the revised copy shall be submitted to the Board. The Board shall certify the revised copy as the approved campus plan. Copies of the approved plan shall be maintained in the Office of Zoning and the Office of the Zoning Administrator.

19. The University shall submit a special exception application to the Board for each structure or addition to an existing structure that the University proposes to construct over the life of the Plan. In addition to a demonstration of compliance with applicable provisions of the zoning regulations and the contents of the approved 2001 Campus Plan, each application shall include the following:

a. A showing that the use, height, bulk, and design (including the location of any means of approach and egress) of the proposed structure is sensitive to and compatible with adjacent and nearby non-University-owned structures and uses;

b. An indication of any need for, amount of, and proposed locations of interim leased space necessary to accommodate housing and/or activities displaced by construction, and/or activities intended to be located permanently in the completed structure;

c. Recomputation of the University's total FAR, copies of which shall be submitted to the Office of Zoning and the Zoning Administrator. Such information shall be broken down by zone district and include the following: existing and occupied FAR; FAR under construction pursuant to Board approval; and FAR upon completion of the proposed structure;

d. An updated student enrollment headcount indicating actual enrollment of full-time undergraduate students, as of 30 days prior to the application date, and the number and percentage of full-time undergraduate students housed on campus, including documentation and an explanation of the methods and assumptions used in the calculation;

e. The most recent audited count of full-time undergraduate students residing in the Foggy Bottom/West End Area outside of the campus plan boundaries;

f. A progress report on the implementation of the streetscape plan required by Condition No. 7;

g. The number of off-street parking spaces within campus boundaries, as of 30 days prior to the application date, including documentation and an explanation of the methods and assumptions used in the calculation; and

h. A status report on the Transportation Management Program.

20. No special exception application filed by the University for further processing under this plan may be granted unless the University proves that it has consistently remained in substantial compliance with Conditions 1 through 19 set forth in this Order. Further, any violation of a condition of this Order shall be grounds for the denial or revocation of any building permit or certificate of occupancy applied for by, or issued to, the University for any University building or use approved under this plan, and may result in the imposition of fines and penalties pursuant to the Civil Enforcement Act, D.C. Code §§ 6-2701 to 6-2723.

VOTE: **4-0-1** (Robert N. Sockwell, Anne M. Renshaw, and Carol J. Mitten to grant; Sheila Cross Reid to grant and concurring in all conditions except Conditions No. 9; Rodney Moulden not present, not voting.)

BY ORDER OF THE D.C. BOARD OF ZONING ADJUSTMENT

Each concurring member has approved the issuance of this Order.

ATTESTED BY: _____
JERRILY R. KRESS, FAIA
Director

Final Date of Order: MAR 2 9 2001

PURSUANT TO 11 DCMR §3125.6, THIS ORDER WILL BECOME FINAL UPON ITS FILING IN THE RECORD AND SERVICE UPON THE PARTIES. UNDER 11 DCMR §3125.9, THIS ORDER WILL BECOME EFFECTIVE 10 DAYS AFTER IT BECOMES FINAL.

PURSUANT TO 11 DCMR § 3205, FAILURE TO ABIDE BY THE CONDITIONS IN THIS ORDER, IN WHOLE OR IN PART, SHALL BE GROUNDS FOR THE REVOCATION OF ANY BUILDING PERMIT OR CERTIFICATE OF OCCUPANCY ISSUED PURSUANT TO THIS ORDER.

THE APPLICANT SHALL COMPLY FULLY WITH THE PROVISIONS OF THE HUMAN RIGHTS ACT OF 1977, D.C. LAW 2-38, AS AMENDED, CODIFIED AS CHAPTER 25 IN TITLE 1 OF THE D.C. CODE. *SEE* D.C. CODE § 1-2531 (1999). THIS ORDER IS CONDITIONED UPON FULL COMPLIANCE WITH THE HUMAN RIGHTS ACT. THE FAILURE OR REFUSAL OF THE APPLICANT TO COMPLY SHALL BE A PROPER BASIS FOR THE REVOCATION OF THIS ORDER.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT

★ ★ ★

BZA APPLICATION NO. 16553

As Director of the Office of Zoning, I hereby certify and attest that on MAR 29 2001, a copy of the foregoing Decision and Order in BZA Application 16553 was mailed first class, postage prepaid, to each party and public agency who appeared and participated in the public hearing concerning this matter, and who is listed below:

Maureen Dwyer, Esquire
ShawPittman
2300 N Street, NW
Washington, D.C. 20037-1128

Jack Evans, Councilmember
Ward Two
441 4th Street, NW, 7th Floor
Washington, D.D. 20001

Maria Tyler, Commissioner
Single Member District 2A03
949 25th Street, NW
Washington, D.C. 20037

Barbara Spillinger
2500 Virginia Avenue, NW
Washington, D.C. 20037

James McLeod
2424 Pennsylvania Avenue, Suite 407
Washington, D.C. 20037

Chairperson
Advisory Neighborhood Commission 2A
c/o St. Mary's Court
724 24th Street, NW
Washington, D.C. 20037

Richard Sheehey, Commissioner
Single Member District 2A01
2000 F Street, NW, Suite 207
Washington, D.C. 20006

Dorothy Miller, Commissioner
Single Member District 2A05
2440 Virginia Avenue, NW
Washington, D.C. 20037

James T. Draude, Esquire
Driscoll & Draude
1230 31st Street, NW, Second Floor
Washington, D.C. 20007

Sara Maddux, Representative
Monroe House Condominium Association
522 21st Street, NW
Washington, D.C. 20006

Ellie Becker, Vice-President
Foggy Bottom Association
2528 I Street, NW
Washington, D.C. 20037

Michael Thomas
Foggy Bottom Association
c/o West End Library
24th and L Streets, N.W.
Washington, D.C. 20037

Steven J. Mandelbaum, Commissioner
Single Member District 2A06
2222 I Street, NW, Suite 513
Washington, D.C. 20037

Andrew Altman, Director
D.C. Office of Planning
801 North Capitol Street, N.E., Suite 4000
Washington, D.C. 20002

Kenneth G. Laden
Administrator
District Division of Transportation
Department of Public Works
2000 – 14th Street, NW
Washington, D.C. 20009

Michael D. Johnson, Zoning Administrator
Building and Land Regulation Administration
Department of Consumer and Regulatory Affairs
941 North Capitol Street, NE, Suite 2000
Washington, D.C. 20002

Attested by: Jerrily R. Kress
JERRILY R. KRESS, FAIA
Director



November 15, 2002

STATUS OF COMPLIANCE OF THE GEORGE WASHINGTON UNIVERSITY WITH BZA CAMPUS PLAN CONDITIONS 1 - 19

Condition 1

The Applicant's proposed campus plan is approved until June 30, 2009, subject to the following conditions intended to mitigate those adverse impacts identified in this Order and adverse impacts potentially arising from the location of a university use in a residentially zoned district, or until such time prior to June 30, 2009 as the Zoning Commission determines that conditions warrant submission of an updated campus plan.

Status: No action required.

Condition 2 (Revised per BZA Remand Order of January 23, 2002)

The campus boundary as depicted in the plan offered by the Applicant is modified and expanded to encompass certain University-owned properties located outside of and adjacent to the southern boundary as previously drawn. The campus plan boundary shall be redrawn to include within it the Dakota at 2100 F Street in Square 81; 2201 Virginia Avenue (Riverside Towers), addressed 518 through 526 22nd Street in Square 58; addresses 2206 and 2208 F Street in Square 58; and the University-owned property in Square 43. In addition, in the event that the Zoning Commission approves the University's application for modification of the approved PUD for Square 122, the campus boundary shall be redrawn to include the PUD property in Square 122 once at least 193 beds for undergraduates are made available there.

Status: The map showing the campus plan boundary has been redrawn and submitted, initially on May 3, 2002 and corrected on August 26, 2002. Pursuant to the last sentence of the condition, the map was resubmitted on November 12, 2002 to show the addition of 1957 E Street, approved as a PUD modification in Zoning Commission Order 746-C.

Condition 3

The University shall work with community representatives to form an Advisory Committee for the purpose of fostering consistent communication between the University and the Foggy Bottom/West End community, discussing issues of mutual interest and proposing solutions to problems that exist or arise in implementing the approved campus plan. It is recommended that the Advisory Committee consist of 10 members: five

members to be selected by the University and five members chosen by ANC 2A, the Foggy Bottom Association, and the West End Citizens Association. The Advisory Committee should schedule quarterly meetings open to the public, and should keep minutes of each meeting. Upon request, the University will provide timely data relevant to campus plan issues to the Advisory Committee, provided that the data is not confidential or overly burdensome to produce. Decisions regarding the operation of the Committee should be made jointly by the University and the community.

Status: The University has expressed in writing to community representatives on at least three separate occasions that the University is ready to convene the Advisory Committee. Most recently, the University sent a letter dated May 24, 2002 suggesting that the Committee be convened, and sent an e-mail message this month to the same effect. To date, community representatives have not responded, although the University remains ready to meet.

Condition 4

The University shall notify the Office of Planning, ANC 2A, and the Advisory Committee of its development plans for a specific site on campus following the approval of the proposal by appropriate University committees and the University's Board of Trustees and prior to preparation of final, detailed plans and specifications.

Status: The University has notified the named parties (with the exception of the Advisory Committee, see response to Condition 3) of its development plans for the specific projects undertaken to date: the student housing facilities on Squares 43 and 57, the Funger Hall Addition on Square 56, and the addition to the Art Department on Square 77.

Condition 5

The University shall incorporate the following land-use policy into the 2001 Campus Plan: University uses and structures (including the location of any means to approach to and egress from the structure) will be located to avoid adverse impacts on non-University properties, especially those residential properties on the periphery of the campus.

Status: The land use policy was incorporated in the GW filing of May 3, 2002.

Condition 6

The University shall incorporate the following design policy into the 2001 Campus Plan: The height, bulk and design (including the location of any means of approach and egress)

of future University structures will be compatible with and sensitive to the height, bulk, and design of adjacent non-University-owned structures.

Status: This design policy was incorporated in the University's filing of May 3, 2002.

Condition 7

The University shall prepare a detailed streetscape plan applicable to the entire campus. The plan shall include, among other elements, a discussion of the installation of sign pylons, and it shall be developed in conjunction with the Office of Planning, the Department of Public Works, and the Advisory Committee. Upon completion, the plan shall be submitted to the Board for review.

Response: GW prepared a draft streetscape plan for review by the Office of Planning and the Department of Public Work (now Department of Transportation) for their comments on March 28, 2002. Comments were received on September 11, 2002 and a meeting with OP and DOT representatives was held on October 1, 2002. GW is revising the plan pursuant to comments received and will submit a revised plan to OP, DOT and Advisory Neighborhood Commission 2A (in lieu of the Advisory Committee, see response to Condition 3.)

Condition 9 (Revised per BZA Remand Order of January 23, 2002)

The University must ameliorate the adverse consequences of its failure to supply sufficient housing for its full-time undergraduate students on campus by taking the following steps:

a.) Beginning no later than August 31, 2002, the University shall provide beds for at least 5600 full-time undergraduate students on campus or outside Foggy Bottom/West End (as the terms "campus" and "Foggy Bottom/West End" are defined in this Order).

b.) Beginning in August 2002, whenever the head count of full-time undergraduate enrollment exceeds 8000 (the "base number"), the University shall provide one bed on campus or outside the Foggy Bottom/West End area for each full-time undergraduate in excess of the base number.

c.) No later than August 31, 2006, the housing requirements in subparagraphs a. and b. of this condition shall be met exclusively by on-campus housing. The Zoning Commission may extend this deadline after notice and public hearing but only (1) to the extent of time lost as a result of unusual delays by government agencies in

processing applications for special exceptions for residential projects; (2) for the duration of third-party appeals to the District of Columbia Court of Appeals or to another judicial forum from the grant of a special exception for a residential project; (3) to the extent of time lost as a consequence of construction delay resulting from acts of God, contractor delays, or acts of third parties. No extension may be granted for delays fairly attributable to University actions or for delays resulting from the processing of Planned Unit Development (PUD) applications before the Zoning Commission or from judicial challenges to PUD approvals.

Status: These conditions were declared unconstitutional and invalidated by the Order of the U.S. District Court, entered April 12, 2002, Oberdorfer, Judge.

d.) Beginning February 28, 2002, and semiannually thereafter in August and February, the University shall file with the Zoning Commission, Zoning Administrator, the Office of Planning, ANC2A, and members of the Advisory Committee established in accordance with Condition 3 reports under oath giving (1) the number of full-time undergraduate students then enrolled; (2) the number of University-supplied beds (a) occupied by and (b) made available to its full-time undergraduate students outside the Foggy Bottom/West End area; (4) the number and location of University-supplied beds (a) occupied by and (b) made available to its full-time undergraduate students within Foggy Bottom/West End. For purposes of these reports, the term "University supplied beds" shall include beds in any property in which the University has an ownership, leasehold, or contractual interest. Each report shall be accompanied by supporting documentation and full explanations of methods, assumptions, and sources used to compile information in the report.

Status: GW has made the required filings. The most recent filing was made on August 28, 2002, supplemented by letter dated September 23, 2002.

Condition 10:

Commencing in the Fall 2001 semester, the University shall require all full-time freshmen and sophomore students to reside in University housing located within the campus boundary established by the Board, to the extent that such housing is available. The University may exempt students who commute, are married or have children, or have disabilities or religious beliefs inconsistent with residence hall life.

Status: This condition was declared unconstitutional and invalidated by the Order of the U.S. District Court, entered April 12, 2001, Oberdorfer, Judge.

Condition 11:

The University shall institute a program to provide its students who are eligible to live off-campus with information about housing opportunities outside the Foggy Bottom/West End Area. The University shall provide this information using local licensed brokers or apartment locators as appropriate, and shall also provide information on the availability, reliability, and accessibility of public transportation between the campus and the housing opportunities. For those locations that are not Metro accessible, the University shall explore the use of a shuttle bus service to its campus for areas that the University determines contain a critical mass of University students, and shall report its criteria and findings to the Advisory Committee annually, at the beginning of each Fall semester.

Status: The University provides information on housing opportunities outside of Foggy Bottom/West End to its students online and through University publications. Additional information is provided about transportation. The University has tracked the local addresses of its full time undergraduate students and has not identified any areas that contain a critical mass of students that are not Metro accessible.

Condition 12:

The University shall expand the use of disciplinary interventions to acts of misconduct by students living off-campus in the Foggy Bottom/West End Area, even if the students are not in properties owned or controlled by the University. The University shall act on incident reports by residents, the ANC, community associations, building management, building association boards, University security officers, and police. The University shall develop an outreach program with neighboring apartment buildings to educate management companies and tenant associations on the University's disciplinary program and its reporting requirements to facilitate effective use of its program. Additionally, subject to applicable law, the University shall permit management companies to obtain University clearances for student applicants for apartments to prevent students who are not eligible for the University's on-campus housing due to conduct violations from obtaining units in neighboring apartments.

Status: The University has expanded its use of disciplinary interventions to off campus conduct. The University regularly receives, and responds to, reports of misconduct from non-University sources. GW has worked with the management company for Columbia Plaza in facilitating the operation of student disciplinary procedures for misconduct at that facility, as well as providing clearances for students concerning conduct violations. The University has had discussions with other property managers, but continues to have concerns about the legality of releasing student information under the Family Educational Right to Privacy Act.

Condition 13:

The University shall maintain and publicize a hotline available 24 hours per day, seven days per week to receive calls about student conduct issues and safety and security concerns. The University shall maintain a log of all calls received and all actions taken, including all referrals made. The University shall maintain its Crimes Tips Hotline (presently 994-TIPS), where calls can be made anonymously to a recorded "tip" line. Calls needing a more immediate response shall be directed to the University police (presently 994-6110) 24 hours per day, seven days per week. The University police will aid off-campus complainants in obtaining assistance from the Metropolitan Police Department. Reports of improper off-campus student conduct will also be referred to the appropriate University departments for their attention.

Status: The University has established and maintained the telephone lines and logs referenced. The University continues to respond to complaints of off-campus misconduct and assist complainants in obtaining assistance from MPD.

Condition 14:

The University shall promptly establish a mandatory program for its students that will address "good neighbor" issues, educating students about appropriate conduct in the off-campus community.

Status: The University has established this good neighbor program, which is provided during orientation at the beginning of the school year.

Condition 15:

The University shall implement measures to minimize adverse impacts associated with parking and traffic.

a.) Support of Mass Transit: The University shall institute the Metrochek program offered by the Washington Metropolitan Area Transit Authority (WMATA) to allow employees to pay for public transportation costs on a pre-tax basis, with a target date for implementation of Spring 2001. In an effort to increase Metro ridership among the student population, the University shall implement an introduction to public transportation program for incoming students that includes provision of WMATA's "SmarTrip" cards to incoming students as of the Fall 2001 new student orientation. The University will work with Metro to schedule a future SmarTrip "carding event" starting Fall 2001 at various locations around campus to provide additional information about public transportation to the University community.

Status: The University has implemented the Metrochek program for employees and the WMATA carding event for students during orientation.

b.) Parking: The University shall provide at least 2,800 off-street parking spaces within the campus boundary. Any off-street parking obtained by the University at a location outside the campus plan boundaries, including the University's off-campus spaces located at the Kennedy Center, shall not be counted toward the 2,800 minimum for purposes of satisfying this condition. The number of off-street parking spaces required to be provided within the campus boundary may be increased in any subsequent special exception order issued pursuant to this plan if necessary to mitigate the adverse impact of the approved uses on parking. The University shall monitor its utilization of University parking lots to determine usage patterns and to conduct an ongoing assessment of parking needs.

Status: The University currently maintains 2,919 parking spaces on campus pursuant to this condition and continues to monitor the usage of its lots.

c.) Community Parking Program: In addition to its on-campus parking inventory, the University maintains parking facilities in certain off-campus properties. Members of the Foggy Bottom community have expressed an interest in exploring the creation of a parking program pursuant to which non-student residents of the Foggy Bottom community would be permitted to park in University properties. The University shall provide contracts for parking to residents of the Foggy Bottom/West End Area on a space-available basis. The location of such spaces will be determined by the University. Levels of and changes in availability will be reported to the Advisory Committee on request.

Status: In the absence of the Advisory Committee, the University has begun discussion of the availability of off campus parking spaces for community use with small groups of residents. The University intends to continue this discussion with ANC 2A to determine GW might meet community needs.

d.) Notice: The University shall notify all affected property owners or occupants in a timely manner of the occurrence of any temporary street closing necessary to accommodate University-related functions.

Status: No street closings have been held since this condition was imposed.

e.) Student vehicles: The Applicant, through its Office of the Registrar, shall maintain an accurate record of the license plate numbers of motor vehicles kept by students, updated annually at the beginning of the Fall semester. The Applicant shall direct the students to register their vehicles in the District of Columbia, or obtain a reciprocity sticker, and shall consult with the D.C. Department of Motor Vehicles to determine whether such registration is

completed or such stickers are obtained. The Applicant shall withhold parking privileges to students who do not comply with D.C. registration or reciprocity requirements. Failure to register student vehicles in the District or to obtain reciprocity stickers shall constitute a violation of the Code of Student Conduct.

Status: This condition has been challenged by the University in the United States District Court and a decision on the challenge is currently pending. To date, the University has notified students in writing that they must register their vehicles in compliance with District of Columbia law.

Condition 16:

Within six months of the effective dates of this Order, the University shall prepare an updated comprehensive management plan to address traffic and parking associated with attendance at events on campus that are attended by a significant number of persons not normally associated with the University and the campus, who come to the campus for the specific purpose of attending the event. The management plan shall be maintained by the University, made available to the public, and submitted to the Advisory Committee, and shall include the following:

a.) Measures to schedule events at times that reduce conflicts with other traffic and other demands for parking.

b.) Measures to discourage travel by private automobile and encourage travel by public transportation.

c.) Measures to encourage persons who drive to park in commercial or University parking garages.

d.) Any other specific measures to address parking demand and decrease vehicular traffic in the surrounding Foggy Bottom/West End Area.

Status: The comprehensive management plan was adopted by the University on November 7, 2001. Given the absence of an Advisory Committee (see response to Condition 3) no submission has been made to that body.

Condition 17: (Revised per BZA Remand Order of January 23, 2001)

Starting in the Fall 2001 registration process, the University shall gather information about the local addresses of the full-time undergraduate population. The University shall update the information semiannually. Beginning February 28, 2002, and semiannually thereafter in August and February, the University shall provide the Zoning Commission, Zoning Administrator, ANC2A, Office of Planning, and Advisory Committee with an audited census of the number of full-time undergraduate students residing in (1) Foggy Bottom/West End outside the campus plan boundaries; (2) the District of Columbia

outside the campus plan boundaries and Foggy Bottom/West End, organized by postal zip codes; (3) Maryland; and (4) Virginia. Each semiannual report shall also include a good faith estimate of the number of married students and students with children encompassed in each category. (1)-(4). The latest semiannual report shall be included with each applicant for a special exception filed pursuant to the approved 2001 Campus Plan.

Status: The information has been presented biannually. The most recent filing was made on August 28, 2002, as supplemented by the filing of September 2002. Condition 18:

Condition 18:

Within 90 days of the effective date of this Order, the University shall revise the Campus Plan to reflect changes mandated by the above-stated conditions. The revision shall include a revised map of the campus, with the following specifications: The map shall show the campus boundaries and the number of each square within the boundary, and shall identify the approved uses for each square; the map shall be legible and not require color for graphic clarity. Upon completion, the revised copy shall be submitted to the Board. The Board shall certify the revised copy as the approved campus plan. Copies of the approved plan shall be maintained in the Office of Zoning and the Office of the Zoning Administrator.

Status: The revised Campus Plan and map was submitted on May 3, 2002, corrected on August 26, 2002, and resubmitted on November 12, 2002 to show the addition of 1957 E Street, as approved by Zoning Commission Order 746-C..

Condition 19

The University shall submit a special exception application to the Board for each structure or addition to an existing structure that the University proposes to construct over the life of the Plan. In addition to a demonstration of compliance with applicable provisions of the zoning regulations and contents of the approved 2001 Campus Plan, each application shall include the following:

[List of eight requirements]

Status: The University has submitted the required information with the applications for new structures and additions to existing structures under the 2001 Campus Plan filed to date. The application for modification of the conditions for the Health and Wellness Center contained in BZA Order for Application No 16276 do not involve a new structure or addition to an existing structure.



HEALTH AND WELLNESS CENTER
OCCUPANCY - MONDAY THRU THURSDAY (OPEN 7:00-1:00)

TIME	1 Locker Room A	2 Locker Room B	3 Locker Room C	4 Locker Room D	5 Locker Room E	6 Laundry	7 Central Issue	8 Multi-purpose	9 Wellness	10 Free Weights	11 Weights	12 Rec Administration	13 Lounge	14 Raquetball	15 Multi-purpose	16 Juice Bar	17 Classroom	18 Lounge	19 Gym	20 Warm-up/Cool-down	21 Raquetball	22 International Squash	23 Lounge	24 Warm-up/Cool-down	25 Gym	26 Warm-up/Cool-down	27 International Squash	28 Lounge	29 Running Track	30 Warm-up/Cool-down	31 Lounge	TOTAL
7:00 AM							1					2		8							2	6					6		2	2		29
8:00 AM							1			4	6	2		8		2	20				2	6					6		2	2		61
9:00 AM						1	1		6	4	6	6		8		2	20				2	6						6				68
10:00 AM						1	1	50	6			6	2	8	30	2	20	2			2	6	2				6	2			2	148
11:00 AM						1	1		6			6	2					2					2					2	8	2	2	34
12:00 PM							1	80				2			100													8	2		193
1:00 PM						1	1		6			10		8			45		10	2	2	6		2	10	2	6		8	2		121
2:00 PM						1	1	50	6	6	8	10	8	8	30	5	25	8	10	2	2	6	2	2	10	2	6	2			2	212
3:00 PM						1	1		6	6	8	10	8	8		5	45	8	10	2	2	6	2	2	10	2	6	2			2	152
4:00 PM						1	1		6	6	8	10		8	50	5	25		15	2	2	6		2	15	2	6		4	2		176
5:00 PM						1	1					2		8	50						2	6					6		8	2	•	86
6:00 PM							1					6		8					20	2	2	6			20		6		8	2		81
7:00 PM							1					6	10	8	100		45	10	20	2	2	6	2		20		6	2			2	242
8:00 PM							1			16	24	6	10	8		8	20	10	25	2	2	6	2	2	25	2	6	2			2	179
9:00 PM							1			16	24	4	10	8		8		10	25	2	2	6	2	2	25	2	6	2	8	2	2	167
10:00 PM							1			16	24	4		8		8			10	2	2	6		2	10	2	6		2	2		105
11:00 PM							1					2		8							2	6					6		2	2		29
12:00 AM							1					2		8							2	6					6		2	2		29
TOTAL																																2112

HEALTH AND WELLNESS CENTER
OCCUPANCY - FRIDAY AND SATURDAY (OPEN 11:00-8:00)

TIME	1 Locker Room A	2 Locker Room B	3 Locker Room C	4 Locker Room D	5 Locker Room E	6 Laundry	7 Central Issue	8 Multi-purpose	9 Wellness	10 Free Weights	11 Weights	12 Rec Administration	13 Lounge	14 Raquetball	15 Multi-purpose	16 Juice Bar	17 Classroom	18 Lounge	19 Gym	20 Warm-up/Cool-down	21 Raquetball	22 International Squash	23 Lounge	24 Warm-up/Cool-down	25 Gym	26 Warm-up/Cool-down	27 International Squash	28 Lounge	29 Running Track	30 Warm-up/Cool-down	31 Lounge	TOTAL
11:00 AM						1	1		6			6	2					2					2					2	8	2	2	34
12:00 PM							1	80				2																				93
1:00 PM						1	1		6			10		8			45		10	2	2	6		2	10	2	6		8	2		121
2:00 PM						1	1	50	6	6	8	10	8	8	30	5	25	8	10	2	2	6	2	2	10	2	6	2			2	212
3:00 PM						1	1		6	6	8	10	8	8		5	45	8	10	2	2	6	2	2	10	2	6	2			2	152
4:00 PM						1	1		6	6	8	10		8		5	25		15	2	2	6		2	15	2	6		4	2		126
5:00 PM						1	1					2		8							2	6					6		8	2		36
6:00 PM							1					6		8					20	2	2	6			20		6		8	2		81
7:00 PM							1					6	10	8	100			10	20	2	2	6	2		20		6	2			2	197
TOTAL																																1052

HEALTH AND WELLNESS CENTER
OCCUPANCY - SUNDAY (OPEN 1:00-7:00)

TIME	1 Locker Room A	2 Locker Room B	3 Locker Room C	4 Locker Room D	5 Locker Room E	6 Laundry	7 Central Issue	8 Multi-purpose	9 Wellness	10 Free Weights	11 Weights	12 Rec Administration	13 Lounge	14 Raquetball	15 Multi-purpose	16 Juice Bar	17 Classroom	18 Lounge	19 Gym	20 Warm-up/Cool-down	21 Raquetball	22 International Squash	23 Lounge	24 Warm-up/Cool-down	25 Gym	26 Warm-up/Cool-down	27 International Squash	28 Lounge	29 Running Track	30 Warm-up/Cool-down	31 Lounge	TOTAL
1:00 PM							1					2		8					10	2	2	6		2	10	2	6		8	2		61
2:00 PM							1	50		6	8	2	8	8		5		8	10	2	2	6	2	2	10	2	6	2			2	142
3:00 PM							1			6	8	2	8	8		5		8	10	2	2	6	2	2	10	2	6	2			2	92
4:00 PM							1			6	8	2		8		5			15	2	2	6		2	15	2	6		4	2		86
5:00 PM							1					2		8							2	6					6		8	2		35
6:00 PM							1					2		8					20	2	2	6			20		6		8	2		77
TOTAL																																493

ع

THE GEORGE WASHINGTON UNIVERSITY
HEALTH AND WELLNESS CENTER
WASHINGTON, D.C.

Transportation Impact Analysis

Prepared For

The George Washington University
Washington, D.C., 20052

Prepared by

Gorove/Slade Associates, Inc.
1140 Connecticut Avenue N.W.
Suite 700
Washington, D.C. 20036
202-296-8625

September 16, 1997

TABLE OF CONTENTS

	Page
LIST OF FIGURES	ii
LIST OF TABLES	ii
INTRODUCTION	1
SCOPE OF STUDY	4
BACKGROUND INFORMATION	5
Health and Wellness Center	5
Site Characteristics	6
Structural Changes On-Campus Since The George Washington University Campus Plan	8
Changes in Washington D.C. Transportation System Since The Campus Plan	10
EXISTING CONDITIONS	11
Roadway Network	11
Existing Volumes	13
Existing Conditions Intersection Capacity Analysis	13
Existing Parking Inventory and Occupancy	15
FUTURE BACKGROUND CONDITIONS	18
Future Background Growth	18
Future Background Traffic Generation	18
Future Background Capacity Analysis	21
TOTAL FUTURE DEVELOPMENT CONDITIONS	22
Future Site Access	22
Site Development Traffic and Pedestrian Generation	22
Directional Distribution	27
Total Future Development Volumes	30
Total Future Development Conditions Capacity Analysis	30
Total Future Parking Inventory	32
CONCLUSIONS	33

List of Figures

Page

Figure 1 Site Location 2
Figure 2 Development Since *The Campus Plan* 9
Figure 3 Existing Lane Configurations 12
Figure 4 Existing Peak Hour Traffic Volumes 14
Figure 5 BZA Parking Inventory. 17
Figure 6 Future Background Volumes 20
Figure 7 Future Site Access 23
Figure 8 Directional Distribution of Site Traffic 28
Figure 9 Health and Wellness Center New Site Traffic Volumes 29
Figure 10 Total Future Peak Hour Traffic Volumes 31

List of Tables

Page

Table 1 Comparison of Existing and Projected Employees and Visitors 5
Table 2 Average Weekday Passenger Boardings 10
Table 3 Existing Capacity Analysis 15
Table 4 Parking Adjustments 16
Table 5 Future Background Capacity Analysis 21
Table 6 Vehicular and Pedestrian Trips 24
Table 7 Occupancy Limits of Health and Wellness Center 26
Table 8 Total Future Development Conditions Capacity Analysis 30

INTRODUCTION

This report presents the findings of a transportation impact analysis for the proposed Health and Wellness Center which is planned to be developed on the western edge of The George Washington University's (GWU) campus in northwest Washington D.C. It will be located at the northwest corner of 23rd and "G" Streets, Northwest in Square 42, Lots 847 and 823. (Lot 823 is under contract with St. Mary's Episcopal Church).

The Health and Wellness Center will provide health and fitness facilities for students, faculty and staff of The George Washington University. Currently, the Charles E. Smith Center (22 years old) provides minimal health and fitness-related activities for members of the campus. The development of an advanced state-of-the-art Health and Wellness Center will allow the University to remain competitive with local area universities such as Georgetown University and The University of Maryland, who currently have similar on-campus facilities.

The George Washington University is a relatively small campus (45 acres) and is bound by Pennsylvania Avenue to the north, 24th Street to the west, "F" Street to the south, and 19th Street to the east. The campus is bordered on all sides by areas zoned for high density, allowing development with a range from 6.0 to 10.0 FAR. The University owns about 83% of the land within these boundaries. The remainder consists of privately-owned parcels. Figure 1 shows the site location of The George Washington University.

The objectives of this report are as follows:

- Determine existing traffic volumes on the roadway network in the vicinity of the proposed Health and Wellness Center.
- Project future traffic conditions after the development of the Health and Wellness Center.
- Provide an update of transportation-related issues for The George Washington University's *The Campus Plan.*

The following tasks were undertaken as part of this study:

- Existing traffic counts were taken and field observations were made on Tuesday August 5, 1997, Wednesday August 6, 1997, and Thursday August 7, 1997.
- Existing pedestrian counts were taken on Wednesday August 6, 1997, Monday August 11, 1997, and Thursday August 14, 1997.
- A survey was taken of the Charles E. Smith Center on Monday September 8,1997.
- Future site-related traffic and pedestrian volumes were estimated based on a previous study of a facility similar in character to the proposed Health and Wellness Center.
- Intersection capacity analyses were performed for Existing, Future Background, and Future Development Conditions.
- Developments that have occurred near The George Washington University, since *The Campus Plan,* were examined to determine possible impacts on the roadway network near the proposed Health and Wellness Center.

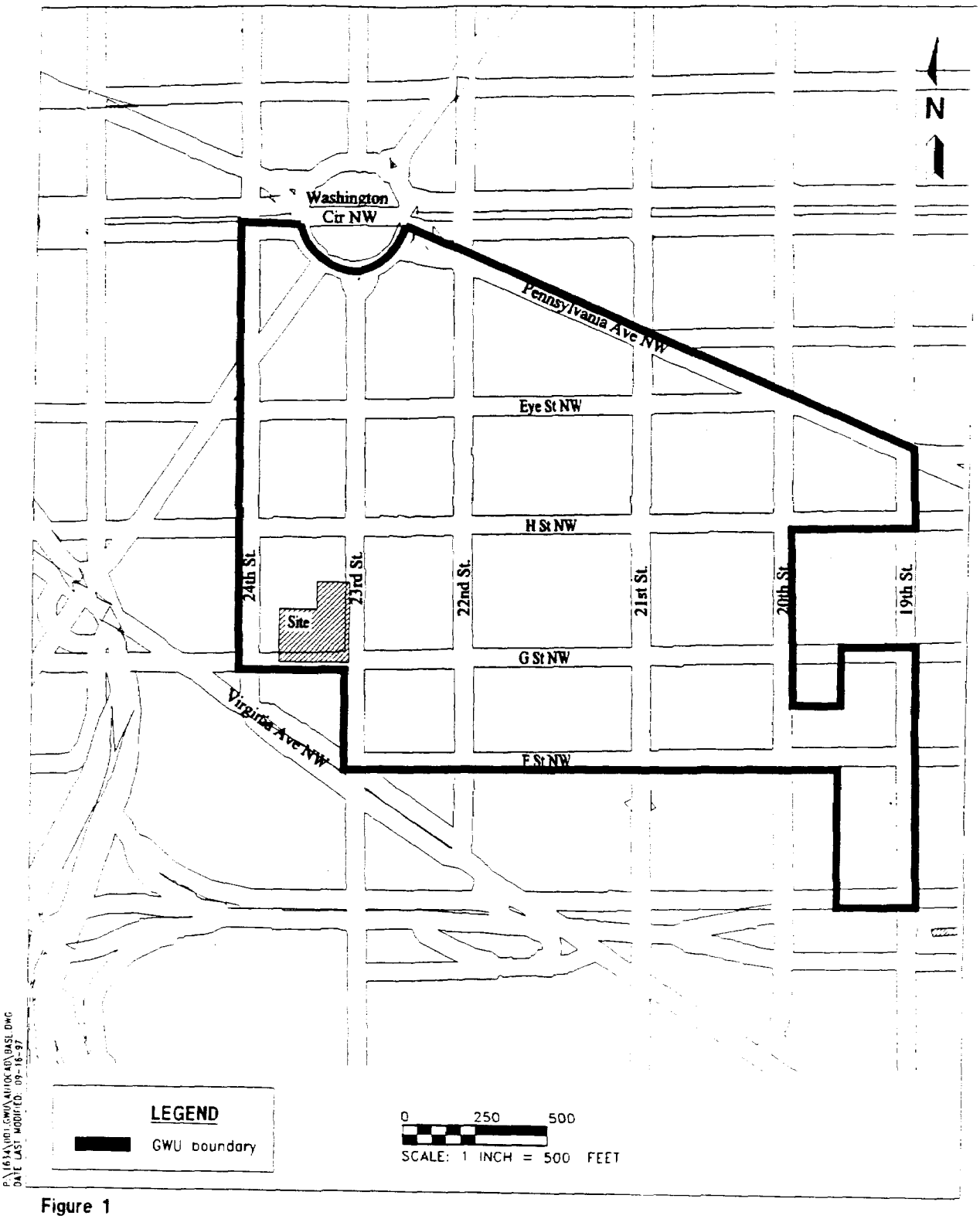


Figure 1
Site Location

Sources of data for this Transportation Impact Analysis include:

- The George Washington University's *The Campus Plan - Year 1985 through Year 2000* .
- The October 1993 "The George Washington University Health and Wellness Center Traffic Analysis" prepared by Robert L. Morris, Inc.
- The February 1995 "The George Washington University's Proposed On-Campus Housing (24th & "H" Streets, N.W.) Traffic Analysis" prepared by Robert L. Morris, Inc.
- The July 30, 1992 "The George Washington University's Health and Wellness Center Traffic Impact Study/Transportation Management Plan" prepared by Callow Associates, Inc.
- The 1988 "The George Washington University Parking Study prepared by Callow Associates, Inc. in 1988
- The May 23, 1996 "Traffic Impact Analysis, American National Red Cross Headquarters Relocation/Expansion Project, Washington D.C." prepared by O.R. George and Associates, Inc.
- The August 11, 1997 "2200 "M" Street N.W. - A Mixed-Use Development Traffic Impact Analysis" prepared by Gorove/Slade Associates, Inc.
- Washington D.C. Department of Public Works
- Arter & Hadden
- The George Washington University
- Field studies and surveys by Gorove/Slade Associates, Inc.

SCOPE OF STUDY

A traffic impact analysis was undertaken to determine the existing conditions on the roadway network adjacent to The GWU campus and to determine the impacts that the implementation of the proposed Health and Wellness Center will have on the surrounding roadway network. The impacts of the site traffic were assessed under future conditions at the projected time of the opening of the proposed Health and Wellness Center. This analysis also includes the impacts that pedestrian volumes within the site vicinity would have on future intersection levels of service.

The following intersections were included in this study:

- 23rd Street/"G" Street, NW
- 23rd Street/"H" Street, NW
- 23rd Street/"F" Street, NW
- 23rd Street/Virginia Avenue, NW
- 24th Street/Virgina Avenue, NW
- Virginia Avenue/"G" Street, NW
- 24th Street/"G" Street, NW
- 24th Street/"H" Street, NW

This report presents the findings of analyses made for the following conditions:

- ***Existing Conditions***
  Considers existing traffic and pedestrian volumes with existing roadway configurations.

- ***Future Background Conditions***
  Considers future traffic and pedestrian volumes for the project build-out year, including projections for growth in traffic, and traffic from approved developments that may impact the study area. This scenario does not include traffic associated with the Health and Wellness Center.

- ***Total Future Development Conditions***
  Considers future traffic and pedestrian volumes with future roadway configurations and the proposed development of the Health and Wellness Center.

The George Washington University campus was examined to determine the impacts on the surrounding roadways as a result of any changes within and near the campus since *The Campus Plan* (submitted 1985, approved 1993). These changes include any new structures on the campus, including parking facilities. Also, changes in land development near the campus and in the transportation system were examined for impacts relevant to the Health and Wellness Center.

BACKGROUND INFORMATION

Health and Wellness Center

The Health and Wellness Center will include 105,103 gross square feet (GSF) of program space. The facility will be developed on 29,162 SF of land parcel. The site is L-shaped, with approximately 180 feet of frontage on 23rd Street and 274 feet of frontage on "G" Street. Construction of the facility is planned to be completed by 2000.

The proposed Health and Wellness Center is planned to be developed at the current location of an existing surface parking lot. The Health and Wellness Center will be designed with three levels of below grade structured parking that will replace the 105 (76 self-park and 29 stacked attendant-aided) existing parking spaces with 140-145 attendant-aided spaces. Motorists who currently utilize the existing surface lot are expected to continue using the new below-grade facility. In addition, employees and patrons of the Health and Wellness Center, and University visitors are also expected to utilize the below grade parking facility. Three spaces in the new parking facility will be designated for truck loading. Parking will be controlled by card access and will be accessible by visitors at current campus parking rates.

It is estimated that the Health and Wellness Center will require approximately six full-time, and six part-time employees for the operation of the facility. The development of the Health and Wellness Center will not result in an increase in the student population. Table 1 summarizes the existing and projected number of employees and visits per day to the Charles E. Smith Center and Health and Wellness Center.

Table 1
Comparison of Existing and Projected Employees and Visitors

		Charles E. Smith Center	Health & Wellness Center
Existing	Employees	38	N/A
	Visits/Day	2200	N/A
Projected	Employees	37	12
	Visits/Day	1100	1355

The Health and Wellness Center will provide state-of-the-art health and fitness facilities for individuals who currently utilize the Charles E. Smith Center. Intercollegiate activities, and some intramural and fitness activities will remain at the Smith Center after the development of the Health & Wellness Center. As Table 1 indicates, half of the daily visits and one employee of the Charles E. Smith Center are expected to transfer to the Health and Wellness Center. The Health and Wellness Center is expected to attract 255 new daily visits.

The majority of the Health and Wellness Center's patrons are expected to visit the facility as an intermediate stop while they are already on campus for academic purposes. Therefore, the Health and Wellness Center will not be a major generator of vehicular traffic.

The Health and Wellness Center will include the following facilities:

- ***Free Zone*** - The free zone area will include a lobby area, offices for the Health and Wellness Center's administrators, and meeting rooms. The area will also include space for building operations, as well as an area for supplies and storage.

- ***Activity Zone*** - The activity zone will include a gymnasium, multi-purpose rooms, weight training area, racquetball courts, international squash courts, men's and women's locker rooms, a juice bar and lounge area, and a laundry room.

The hours of operation of the Health and Wellness Center will remain the same as they currently are in the Smith Center. The hours of operation on Sundays will be limited to 1:00 PM - 11:00 PM in response to a request by St. Mary's Episcopal Church. The peak hours of use for the Health and Wellness Center (4:30 PM - 7:30 PM) are expected to be similar to those of the Charles E. Smith Center.

The design of the Health and Wellness Center does not provide spectator seating. Therefore, it will not be used for special events such as intercollegiate competitions.

The Health and Wellness Center is intended to be a support facility for the academic-related facilities that are located within the core of the campus. As stated in *The Campus Plan*, University buildings requiring the greatest level of access should be given the most central locations, with good access to interior circulation systems. Buildings requiring less accessibility should be located on the periphery of the campus; these include some residences, administrative offices, athletic facilities, certain parking facilities, and support services such as the proposed Health and Wellness Center.

As described in *The Campus Plan*, University structures should be designed and constructed so that they do not adversely affect non-University properties. The Health and Wellness Center was designed to be compatible with and sensitive to the height, and historic significance of neighboring St. Mary's Episcopal Church (located north of the proposed Health and Wellness Center). In addition, locating the Health and Wellness Center's main entrance and below-grade parking entrance off of "G" Street, instead of 23rd Street, will minimize the site-generated vehicular and pedestrian traffic in front of St. Mary's Episcopal Church.

The design of the Health and Wellness Center will also be compatible with neighboring St. Mary's Court and the International Order of Odd Fellows.

Site Characteristics

The Health and Wellness Center will be located at the northwest corner of 23rd and "G" Streets. The site abuts a fifteen-foot wide, east-west public alley directly north, and a thirty-foot wide alley along part of its western lot line. In an agreement with St. Mary's Court, St. Mary's Episcopal Church, and The GWU, the alley located adjacent to the existing parking lot will be closed after the development of the Health and Wellness Center.

The development of the Health and Wellness Center will not require changes to the road network. However, relocating the site entrance from 23rd Street to "G" Street will require changing the location of a curb-side parking space from "G" Street (at new driveway location) to 23rd Street (at existing driveway location). There will be no net change in the number of curb-side spaces.

Currently there is a self-park/attendant-monitored surface parking lot with 105 total spaces at the proposed location of the Health and Wellness Center. The lot is currently accessed through an entrance driveway on 23rd Street.

Existing University developments in the immediate vicinity of the proposed Health and Wellness Center include the following:

- ***Tompkins Hall of Engineering***
  Tompkins Hall of Engineering is an academic facility located on the east side of 23rd Street between "G" and "H" Streets. There are 96 spaces provided in a parking facility adjacent to Tompkins Hall.

- ***Norma Lee and Morton Funger Hall***
  Norma Lee and Morton Funger Hall is a seven-story classroom building located on "G" Street between 22nd and 23rd Streets. There are 122 spaces located below and behind Funger Hall.

- ***Charles E. Smith Center***
  The Charles E. Smith Center is a 129,000 S.F. athletic facility located on 22nd Street between "G" and "F" Streets. Most of the one-story structure is located below street level. There are 46 surface lot spaces located directly adjacent to the Smith Center.

  The Charles E. Smith Center provides facilities for the University's athletic teams and physical education programs. In addition to the Smith Center's large sports arena, the building houses a swimming pool, racquetball and squash courts, and administrative offices.

- ***New Hall***
  New Hall is located at the southeast corner of 24th and "H" Streets. It has the capacity to house 444 students. A parking facility located below New Hall provides students, faculty and staff members with 59 spaces.

Non-University-owned developments within the study area include the following:

- ***St. Mary's Episcopal Church***
  St. Mary's Episcopal Church is located on 23rd Street between "G" and "H" Streets. The church is located north of and adjacent to the proposed Health and Wellness Center site location. Currently, members utilize eight parking spaces located adjacent to the existing lot. After the development of the Health and Wellness Center, the church will retain eight spaces and will also be permitted to utilize 75 surface lot spaces on Sunday mornings. The lot is located adjacent to Tompkins Hall and is accessed off of "H" Street.

St. Mary's Episcopal Church is listed on the National Register of Historic Places by the Congressional Joint Committee on Historic Landmarks. The church holds mass or worship services on Wednesdays and Fridays at 12:00 PM, and Sundays at 8:00 AM and 10:00 AM.

- ***Independent Order of Odd Fellows***
  The Independent Order of Odd Fellows building is located west of the proposed site at the northeast corner of 24th and "G" Streets. After the development of the Health and Wellness Center, the Order of Odd Fellows will retain two privately-owned and two University-owned spaces.

- ***Gewirz B'nai B'rith Hillel Center***
  The Gewirz Hillel Center is a cultural and recreational facility for members of the Jewish community. It is located in the southwest corner of 23rd and "H" Streets. Currently, visitors to this center utilize four privately-owned spaces. On Saturdays, visitors of the Hillel Center are permitted to use 25 University-owned spaces.

- ***St. Mary's Court***
  St. Mary's Court is a senior citizen residential building located on 24th Street between "G" and "H" Streets. St. Mary's Court has 43 parking spaces.

Structural Changes On-Campus Since The George Washington University Campus Plan

The George Washington University's *The Campus Plan* describes the importance of the University's physical development to its long-range plan. *The Campus Plan* demonstrates how the University's built environment will contribute to improving the quality of current programs and implementing the new initiatives that are directed to the advancement of knowledge in many fields.

The Campus Plan is consistent with the District of Columbia's Comprehensive Plan. The District of Columbia's Comprehensive Plan shows that land use in the campus area is institutional, except along the northern and eastern borders. This land is designated as high-density commercial.

The only new campus building recently approved (since *The Campus Plan* was approved) is the new residential building, *New Hall*, located on the southeast corner of 24th and "H" Streets northwest. Figure 2 shows the location of New Hall with respect to the proposed site location.

<u>New Hall</u>

New Hall is a new on-campus housing development that opened to students in the fall 1997 semester. The residence building consists of 119 residential units that have the capacity to house 444 students.

Before New Hall was developed, the site was used as a surface parking lot with 57 parking spaces. A below-grade parking facility with 59 student, faculty and staff parking spaces was constructed to replace the surface lot. Staff members who work in New Hall have priority to use the parking spaces.

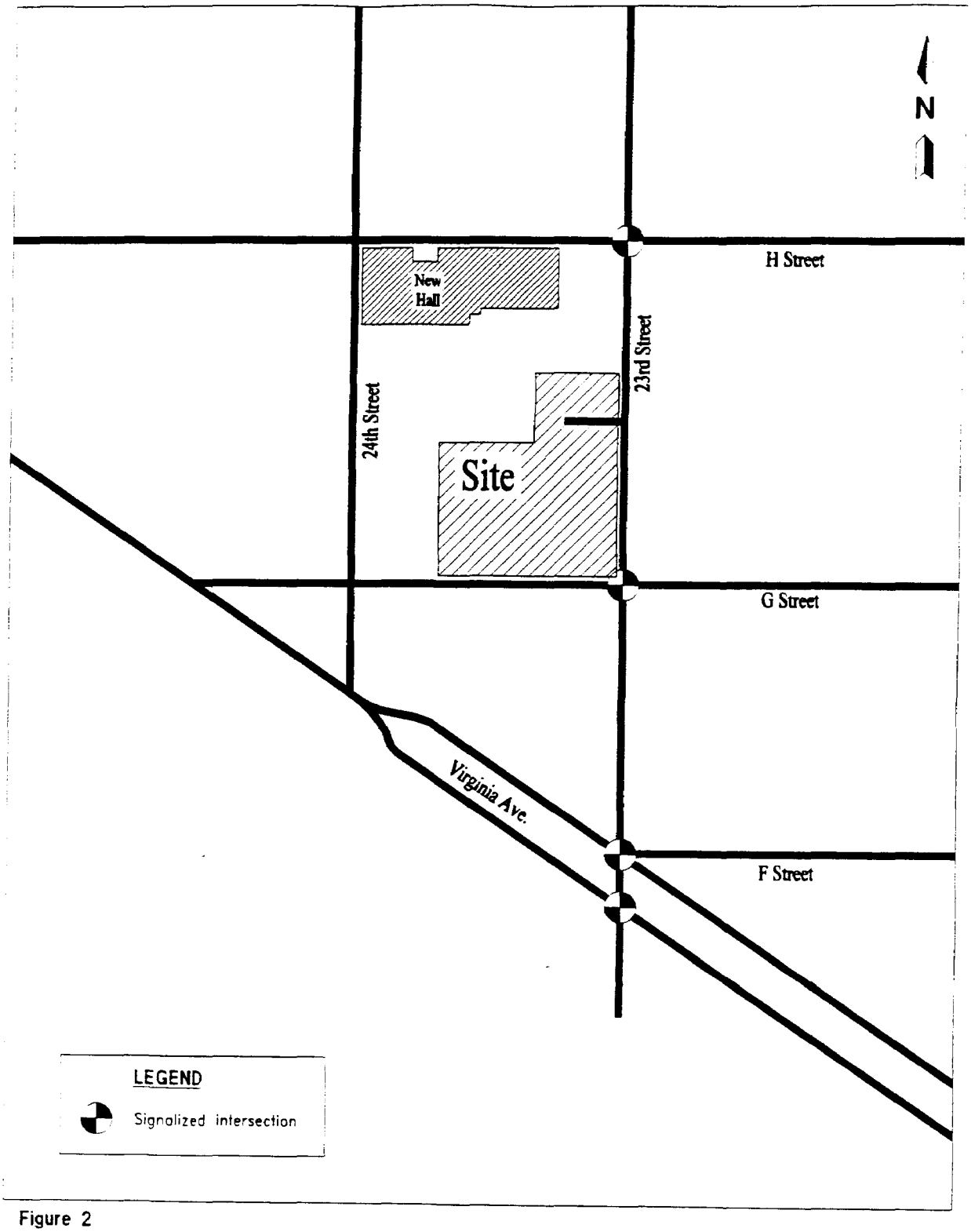


Figure 2
Development Since The Campus Plan

It is expected that students will walk to on-campus destinations, and utilize public transportation for off-campus destinations.

The traffic study for New Hall, which was accepted by the Board of Zoning Adjustments, (BZA), indicated a decrease in traffic. This decrease results from the additional residences on campus that will reduce the number of students who must live off campus and commute.

Changes in Washington D.C. Transportation System Since The Campus Plan

The following significant changes to the downtown transportation system have taken place since *The Campus Plan*:

- construction of the Whitehurst Freeway,
- the closure of Pennsylvania Avenue between 15th Street and 17th Street adjacent to the White House,
- the transformation of Eye and "H" Streets into a one-way pair between 13th Street and Pennsylvania Avenue, and
- the completion of portions of the metro rail systems.

The Whitehurst Freeway has been under construction for several years. Reduced capacity on the freeway may have resulted in some motorists changing their traffic patterns on 23rd Street.

As a result of closing Pennsylvania Avenue near the White House, motorists must find alternative routes such as "I" and "H" Streets to travel east and west across the city.

The Average Daily Traffic (ADT) volumes for certain streets within the study area are included in the Technical Appendix to this report. Increases and decreases in traffic volumes within the area could not exclusively be attributed to any change in the road network.

Passenger counts conducted annually by WMATA were obtained for the Foggy Bottom-GWU metrorail station to determine if changes in ridership would imply changes in metrorail use by the George Washington University faculty, staff, and students. Table 2 summarizes the average weekday passenger boardings for the Foggy Bottom-GWU station from 1985 (the year the GWU survey was made to determine mode choice percentages) until 1997.

Table 2
Average Weekday Passenger Boardings

	1985	1987	1989	1991	1993	1995	1997	% Increase (1985 - 1997)
Foggy Bottom/ GWU	14,928	15,600	18,653	18,560	17,401	17,296	16,554	11%

As the table indicates, the average weekday passenger boardings at the Foggy Bottom/ GWU station increased by an overall 11% from 1985 to 1997. This indicates an increase in metrorail usage for students, faculty and staff since *The Campus Plan*.

EXISTING CONDITIONS

Existing Conditions considers existing traffic and pedestrian volumes with existing roadway configurations. Currently, vehicles accessing the existing surface parking lot must access the driveway off of 23rd Street. Figure 3 shows the proposed site location, existing access driveway, and local roadway network with existing lane usage.

Roadway Network

23rd Street

In the vicinity of the site, 23rd Street is a north-south, undivided, minor arterial. This portion of 23rd street is a six-lane, two-way, roadway that extends south from Independence Avenue near the Lincoln Memorial, through Washington Circle, and terminates at Massachusetts Avenue in Northwest Washington D.C. 23rd street is a one-way southbound roadway north of Washington Circle. 23rd Street is signalized at "G" Street, "H" Street, and Virginia Avenue and "F" Street.

During the AM peak period (7:00 AM - 9:30 AM), northbound 23rd Street dedicates all three lanes to through traffic, while southbound 23rd Street dedicates two of its three lanes to through traffic, and the outermost lane to metered parking. During the southbound peak period (4:00 PM - 6:30 PM), 23rd Street dedicates three southbound lanes to through traffic, and two northbound lanes to through traffic and a northbound lane to metered parking. 23rd Street is approximately 54-feet wide with four ten-foot wide through lanes, a nine-foot wide southbound through/parking lane, and a six-foot wide northbound through/parking lane.

23rd Street carries a heavy volume of commuter traffic through The George Washington University campus to and from the business district north of Pennsylvania Avenue. The Average Daily Traffic (ADT) on 23rd Street is approximately 29,000 vehicles per day.

24th Street

24th Street is a north-south, undivided, collector roadway. In the vicinity of the site, 24th Street is a two-lane roadway that allows parking on both sides of the street. This portion of 24th Street originates south at Virginia Avenue and extends to "N" Street Northwest. 24th Street is approximately thirty-two feet wide with no pavement markings to divide lanes. 24th Street forms a four-way stop at "H" Street. The Average Daily Traffic on 24th Street is approximately 2,000 vehicles per day.

"G" Street

"G" Street is a one-way, two-lane, westbound collector street. It is signalized at 23rd Street, and stop-controlled at 24th Street and Virginia Avenue. The Average Daily Traffic on "G" Street is approximately 2,500 vehicles per day. "G" Street is thirty-six-feet wide with no pavement markings to divide lanes. Metered, residential, and free parking is provided on both sides of the street. The pavement on "G" Street is in poor condition.

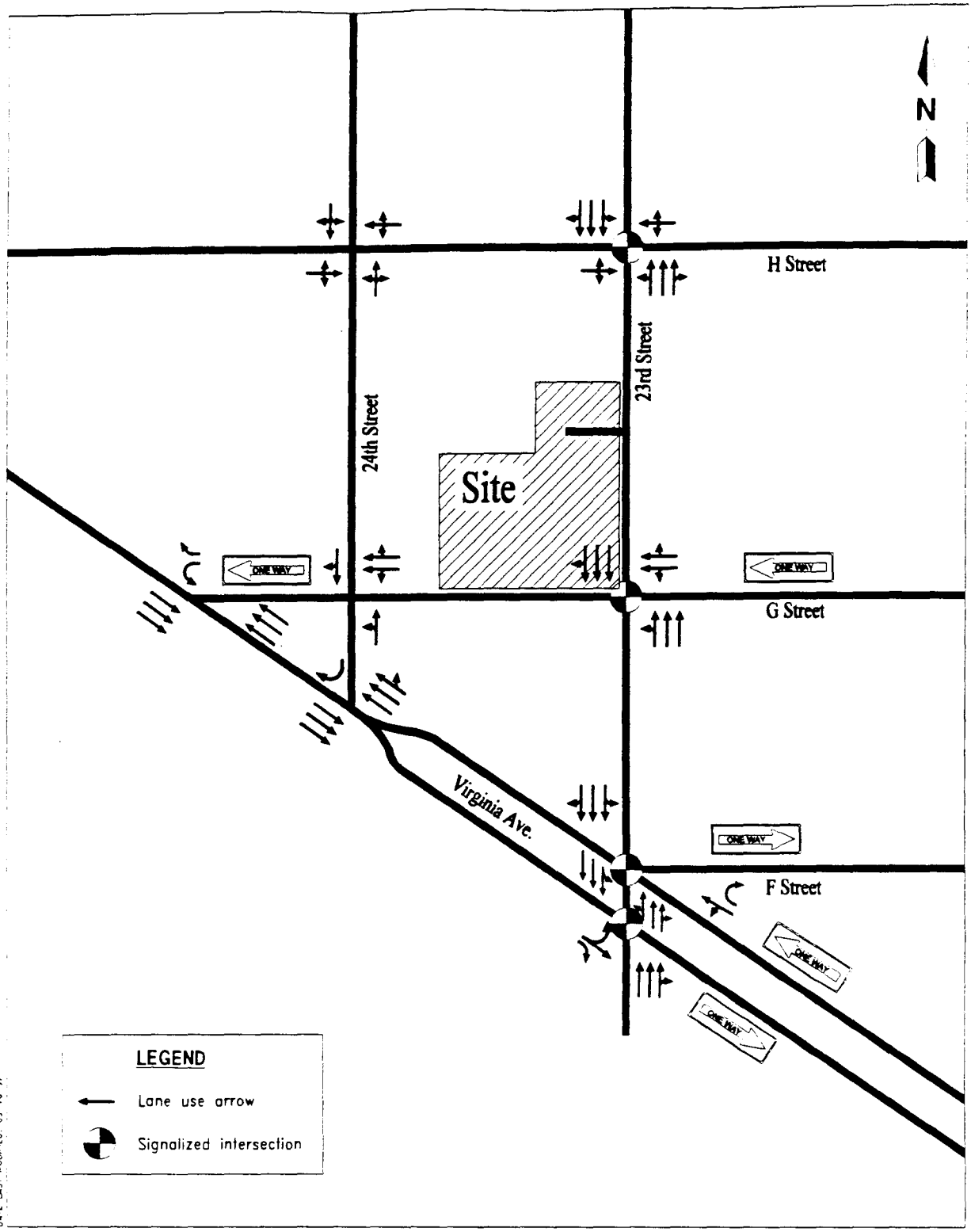


Figure 3
Existing Lane Configurations

"H" Street
"H" Street is a two-lane, two-way, undivided collector street. "H" Street is thirty feet wide with no pavement markings to divide lanes. Metered, residential, and free parking is permitted on both sides of the street. "H" Street is signalized at 23rd Street and forms a four-way stop with 24th Street. The Average Daily Traffic on "H" Street within the vicinity of the site is approximately 4,000 vehicles per day.

Virginia Avenue
Virginia Avenue is a six-lane, divided, northwest-southeast roadway. Virginia Avenue extends south from Constitution Avenue to Rock Creek and Potomac Parkway. Virginia Avenue is grade-separated at 23rd and "F" Streets. On- and off-ramps at the Virginia Avenue/23rd Street/"F" Street intersection allow motorists traveling on Virginia Avenue to access 23rd and "F" Streets, and allow motorists traveling on 23rd and "F" Streets to access Virginia Avenue.

Existing Volumes

Manual traffic counts were taken on Tuesday August 5, 1997 (7:00 AM - 9:30 AM and 3:30 PM - 6:30 PM), Wednesday August 6, 1997 (5:00 PM - 6:00 PM), and Thursday August 7, 1997 (8:00 AM - 9:30 AM) at the following intersections:

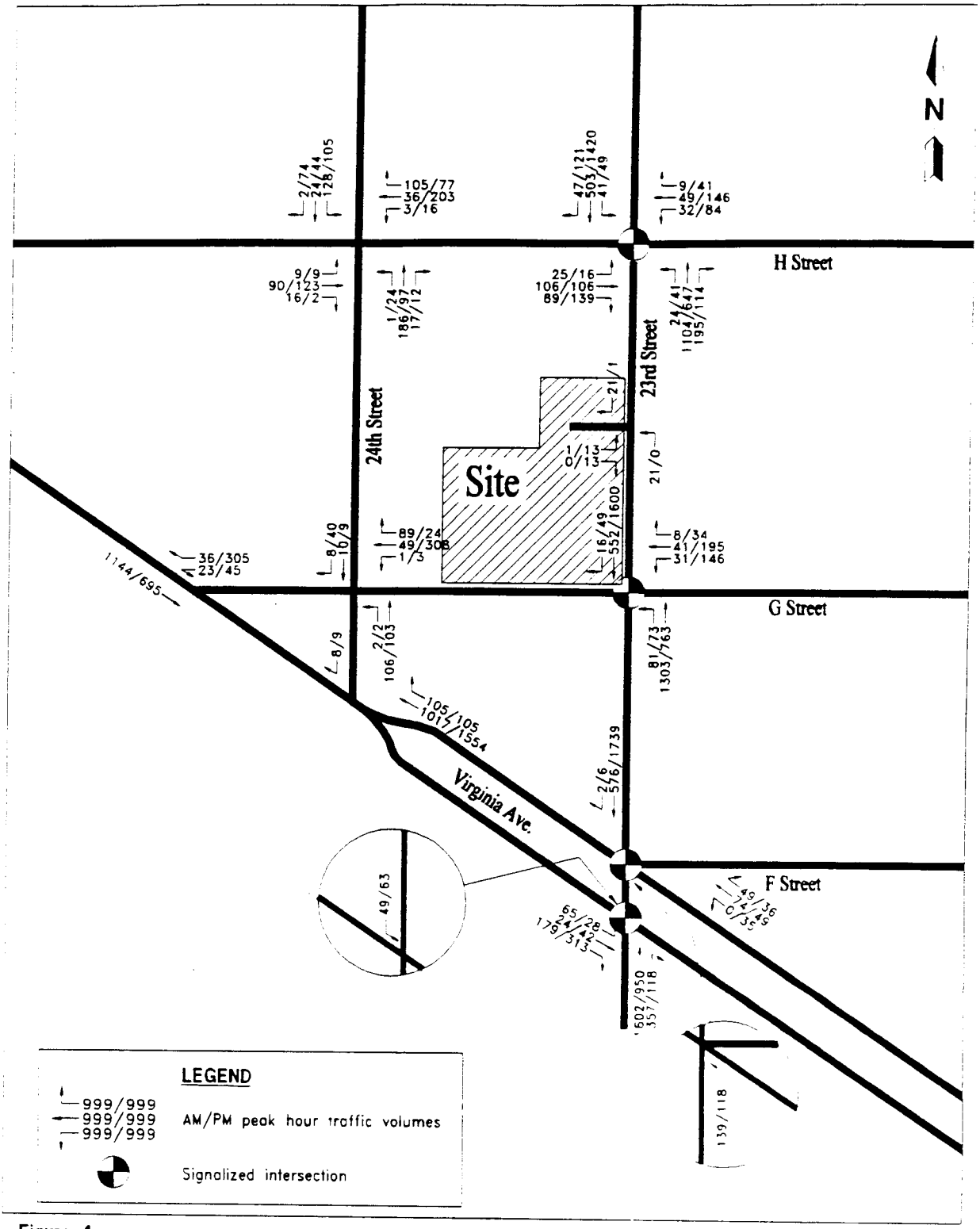
- 23rd Street/"G" Street, NW
- 23rd Street/"H" Street, NW
- 23rd Street/"F" Street/Virginia Avenue, NW
- 24th Street/Virgina Avenue, NW
- Virginia Avenue/"G" Street, NW
- 24th Street/"G" Street, NW
- 24th Street/"H" Street, NW

From these counts the AM and PM peak hours were determined to be 8:15 AM - 9:15 AM and 5:30 PM - 6:30 PM respectively.

Traffic counts in the site vicinity were also taken in April 1993 (during the spring semester) for the October 1993 "George Washington University Health and Wellness Center Traffic Analysis" prepared by Robert L. Morris, Inc. These traffic volumes were grown 2% per year for four years to project traffic volumes under existing conditions. The volumes projected from 1993 were higher than the traffic volumes obtained from the August 1997 manual counts. The projected volumes indicate the traffic conditions when student enrollment is at its highest (during the fall or spring academic semesters); therefore, the projected volumes were used as existing peak hour volumes for this analysis. These volumes are shown on Figure 4. Traffic and pedestrian volumes obtained from manual counts are included in the appendix section of this report.

Existing Conditions Intersection Capacity Analysis

Intersection capacity analyses were performed for the AM and PM peak hours for existing conditions. The capacity analyses are based on methods outlined by the Transportation Research Board's *Special Report 209: Highway Capacity Manual (HCM)*, 1994. Levels of service range



P:\1654\001.GWU\AUTOCAD\BASE.DWG
DATE LAST MODIFIED 09-16-97

Figure 4
Existing Peak Hour Traffic Volumes

from "A" (best) to "F" (worst). Analyses were performed at the following intersections and are summarized in Table 3:

- 23rd Street/"G" Street, NW
- 23rd Street/"H" Street, NW
- 23rd Street/"F" Street/Virginia Avenue, NW
- 24th Street/Virgina Avenue, NW
- Virginia Avenue/"G" Street, NW
- 24th Street/"G" Street, NW
- 24th Street/"H" Street, NW

Table 3
Existing Capacity Analysis

Roadway Intersection		Level of Service	
		AM Peak Hour	PM Peak Hour
		Delay in Seconds	Delay in Seconds
23rd Street/"G" Street	signalized	B(5.1)	B(9.1)
23rd Street/"H" Street	signalized	B(7.5)	B(12.6)
23rd Street/"F" Street	signalized	B(10.7)	*
23rd Street/Virginia Avenue	signalized	B(9.8)	B(12.6)
24th Street/Virgina Avenue	unsignalized	A(0.0)	A(0.0)
Virginia Avenue/"G" Street	unsignalized	A(2.3)	B(11.0)
24th Street/"G" Street	unsignalized	A(2.0)	A(4.7)
24th Street/"H" Street	unsignalized	A(3.9)	B(6.1)

** The Value for delay exceeds measurable limits.*

The results of the analysis show that the 23rd Street/"F" Street intersection currently operates at a failing level of service during the PM peak hour. This is due to the high volume of commuter traffic that utilizes 23rd Street while traveling south toward Interstate 66 (major roadway towards Northern Virginia) from the business district north of Pennsylvania Avenue. Field observations show that northbound left-turning vehicles experience delays because of the high volume of opposing southbound traffic. Northbound left-turning vehicles have to wait until their light turns red (when all southbound vehicles have stopped) to turn. Only one or two cars per phase are able to make left-turns. The remaining left-turning vehicles queue at this intersection and must wait until the end of the next phase to turn.

All other intersections within the site area currently operate at acceptable levels of service during both the AM and PM peak hours.

Existing Parking Inventory and Occupancy

According to the BZA inventory, The George Washington University has 2,849 off-street parking spaces. Parking spaces located throughout the campus in various surface lots and parking facilities are designated as follows:

- 937 Student spaces
- 1396 Faculty and Staff spaces
- 390 Visitor spaces
- 126 Mixed-use spaces

Figure 5 identifies the location and number of spaces in each of the off-street parking lots and facilities located on-campus.

Recent projects on-campus have resulted in a change in the BZA parking inventory. Table 4 outlines these planned developments and the individual parking adjustment associated with each. These developments have resulted in a net decrease of 7 parking spaces, resulting in a total of 2,842 spaces on-campus. This number is in accordance with *The Campus Plan's* allowable range of 2,700 to 3,000 spaces.

Table 4
Parking Adjustments

On-Campus Project	Adjustments
Sport Court	-9
New Hall (Student Housing)	2

The Kennedy Center provides The George Washington University with an additional 600-800 off-campus spaces from 7:00 AM until 7:00 PM. The University operates a shuttle bus between the campus and the Kennedy Center parking garage. The George Washington University reciprocates the parking agreement with the Kennedy Center by providing them with overflow parking spaces beginning at 7:00 PM.

It is the University's policy to encourage the use of public transportation. The University is conveniently located near the Foggy Bottom-GWU metrorail station, and has several bus lines that run throughout the campus. However, students who reside on-campus, and faculty and staff who own vehicles are offered full-time parking spaces under a monthly contract. Students who live off-campus can also park under a monthly contract or they can pay a hourly rate to park. University parking rates are set at a rate of about two-thirds of commercial parking rates. These high rates, which are strictly enforced by the University, result in relatively low use of automobiles and high use of public transportation. At the end of the spring 1997 semester, the student parking utilization was as follows:

- 8,029 day decals
- 3,625 night decals
- 1,311 part-time decals

In addition, 5,926 faculty/staff vehicles were registered for the spring 1997 semester.

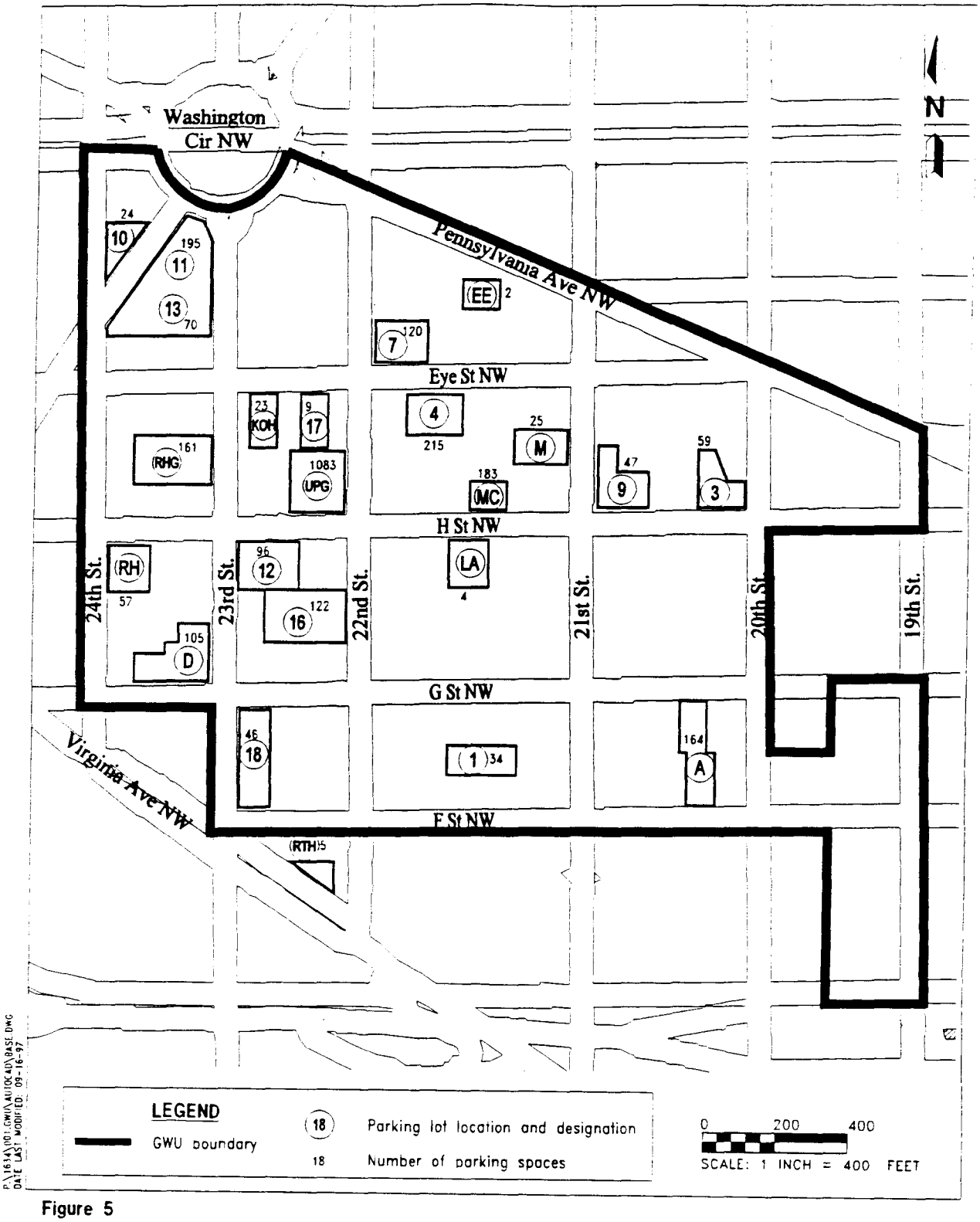


Figure 5
BZA Parking Inventory

FUTURE BACKGROUND CONDITIONS

Future Background Conditions considers what the traffic and pedestrian volumes would be like in the year 2000, if the Health and Wellness Center would not be developed. This scenario adds additional traffic onto the existing volumes to account for growth in traffic, and new traffic that may result from other planned developments (both on- and off-campus). This scenario does not include traffic associated with the Health and Wellness Center.

Future Background Growth

The proposed Health and Wellness Center is planned to be developed by the fall of 2000; therefore, analysis for this study is based on projected volumes and roadway conditions during this time.

Historic traffic growth rates have averaged approximately 1.21% per year in the downtown area. This finding is based upon the review of traffic volume data accumulated at five (5) permanent count stations located in this portion of the city which are maintained by the District of Columbia Department of Public Works. A conservative 2% growth rate was thought to be sufficient for this analysis. Existing 1997 through traffic volumes on 23rd Street were grown 2% per year for three years to account for growth resulting from increased commuter and University traffic.

Future Background Traffic Generation

Off-campus Developments

Future Background traffic associated with other planned and new developments was examined to determine possible impacts on roadways within the site vicinity. The International Finance Corporation and the World Bank, which are both recently developed, are currently fully occupied. Traffic associated with both uses was included in existing traffic counts and was analyzed under Existing Conditions (see Table 3); therefore, traffic associated with either development was not added to Future Background traffic volumes.

- *International Finance Corporation*
  The International Finance Corporation (IFC) is located north of Pennsylvania Avenue between 21st and 22nd Streets.

- *World Bank*
  The World Bank is located in the block bounded by "G", "H", 18th, and 19th Streets.

The International Monetary Fund is currently under construction. Traffic associated with this development is not expected to drive through intersections within the vicinity of the Health and Wellness Center. The American National Red Cross Headquarters and the Associated General Contractors building are planned to be developed in the future. Traffic associated with both developments is not expected to travel through any of the intersections within the vicinity of the Health and Wellness Center. Motorists traveling on Virginia Avenue are expected to drive through the 23rd Street/"F" Street tunnel and will not impact this intersection.

Some of the traffic generated by the proposed 2200 "M" Street development is expected to travel on 23rd Street from the Virginia Avenue/"F" Street intersection through the "H" Street intersection. Additional traffic volumes associated with this development were added to Existing Conditions to create Future Background Conditions.

- ***American National Red Cross Headquarters***
  The American National Red Cross expansion is planned to be located along the north side of "E" Street (westbound) between 20th and 21st Streets, NW.

- ***International Monetary Fund (IMF)***
  The IMF is expanding its office building located in the southwest quadrant at the 19th Street/"H" Street intersection.

- ***Associated General Contractors (AGC)***
  The AGC building is planned to be located at "E" Street between 19th and 20th Streets. The development is planned to include additional office space and residential apartment units.

- ***2200 "M" Street - A Mixed-Use Development***
  The 2200 "M" Street development will consist of residential units. The development is planned to be located in the northern half of the square bounded by "M", 22nd, and 23rd Streets.

On-campus Developments

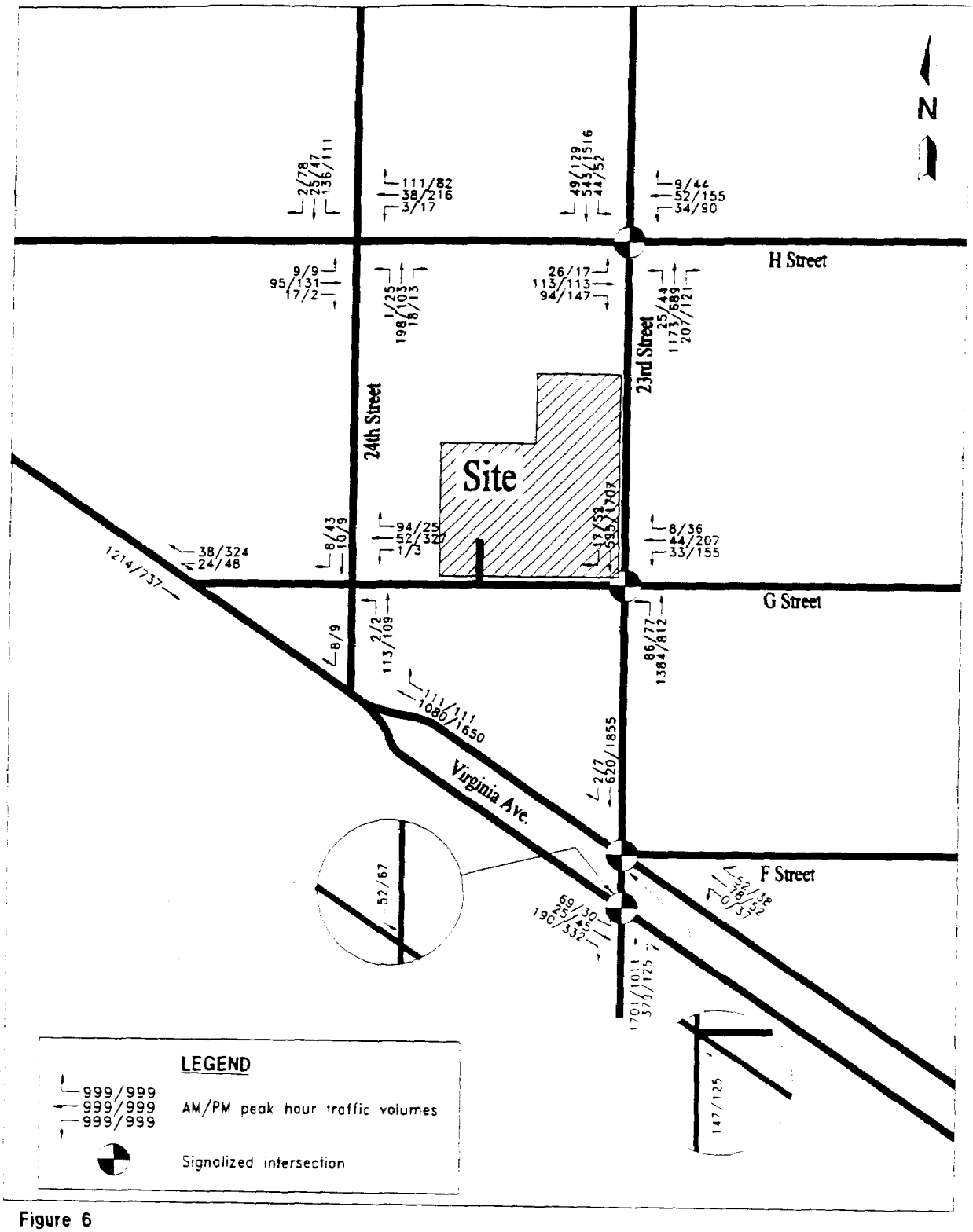
In addition to the Health and Wellness Center, the University is currently planning additional on-campus projects. These projects are planned to provide larger and more adequate facilities for The GWU students. None of the planned projects will cause an increase in student enrollment and should not cause an increase in vehicular or pedestrian traffic. None of the projects will cause a change in the parking inventory.

- *Media and Public Affairs*
  The Media and Public Affairs building is planned to be approximately 100,000 SF (pending BZA approval). The existing 47 surface lot parking spaces will be replaced by underground parking.

- *Marvin Center*
  The Marvin Center is the University's student union. A 10,000 SF addition has been approved by the BZA. This project will result in no net change in parking.

- *Law Center*
  The Law Center is planning to develop a 25,000 SF in-fill development (pending BZA approval). There is no parking associated with this project.

Figure 6 illustrates the projected traffic volumes that were included in the Future Background analysis.



P:\1614\001.GWU\AUTOCAD\BASE.DWG
DATE LAST MODIFIED: 09-16-97

Figure 6
Future Background Peak Hour Traffic Volumes

Future Background Capacity Analysis

A capacity analysis was performed for Future Background Conditions for intersections contained within the study area. The results of the capacity analysis are summarized in Table 5.

Table 5
Future Background Capacity Analysis

Roadway Intersection		Level of Service	
		AM Peak Hour	PM Peak Hour
		Delay in Seconds	Delay in Seconds
23rd Street/"G" Street	signalized	B(5.2)	B(9.4)
23rd Street/"H" Street	signalized	B(7.7)	B(13.6)
23rd Street/"F" Street	signalized	B(12.4)	*
23rd Street/Virginia Avenue	signalized	B(10.3)	C(16.6)
24th Street/Virgina Avenue	unsignalized	A(0.0)	A(0.0)
Virginia Avenue/"G" Street	unsignalized	A(3.4)	C(16.0)
24th Street/"G" Street	unsignalized	A(2.1)	A(5.0)
24th Street/"H" Street	unsignalized	A(4.2)	B(6.7)

** The Value for delay exceeds measurable limits.*

The results of the analysis show that the 23rd Street/"F" Street intersection is expected to operate at a failing level of service during the PM peak hour. This is due to the high volume of commuter traffic that will utilize 23rd Street while traveling south toward Interstate 66 from the business district north of Pennsylvania Avenue. However, the 23rd Street/"F" Street intersection is expected to operate at a Level of Service (LOS) "B" during the AM peak hour.

Using existing signal timings, the 23rd Street/"H" Street intersection is expected to operate at an overall failing level of service. However, if the signal timings are adjusted to allow a slightly longer green-light phase on "H" Street then the intersection is expected operate at an acceptable LOS.

All other intersections within the site area are expected to operate at acceptable levels of service during both the AM and PM peak hours.

TOTAL FUTURE DEVELOPMENT CONDITIONS

Total Future Development Conditions considers future traffic and pedestrian volumes with future roadway configurations. This scenario include traffic associated with the development of the Health and Wellness Center.

Future Site Access

The development of the Health and Wellness Center proposes relocating the driveway entrance from 23rd Street to "G" Street. Relocating the entrance will have the following impacts:

- Site-generated vehicular traffic will no longer have to make left turns into and out of the parking lot driveway against opposing traffic. Instead, traffic will only turn right onto "G" Street, or right into the new driveway.

- Relocating existing parking lot traffic off of a relatively high-volume roadway onto a low-volume collector street will improve conditions on 23rd Street (near the existing driveway location).

- Relocating the site driveway from 23rd Street where there is a higher volume of pedestrian traffic, onto "G" Street, will create safer conditions for pedestrians.

Figure 7 illustrates the future site access location.

Site Development Traffic and Pedestrian Generation

The Health and Wellness Center is proposed for 105,103 GSF of program space. Future traffic and pedestrian volumes associated with the proposed Health and Wellness Center were estimated based on a previous study of a downtown health club similar in size and character.

On Monday September 8, 1997 The GWU conducted a survey of the Charles E. Smith Center to determine the percentage of visitors that arrived by automobile. It was determined that nine percent (9%) of the Smith Center's visitors arrived by automobile. Vehicle and pedestrian trips for the Health and Wellness Center were estimated by assuming that 9% of its visitors would also arrive by automobile and that an average of 1.3 persons would occupy each vehicle.

The Smith Center survey also revealed that only 23% of its visitors came to campus that day specifically to use the Smith Center. The remaining 77% came to campus for purposes other than to visit the Smith Center. Similarly, the Health and Wellness center is expected to be an intermediate stop for students, faculty, and staff members who are already on-campus for academic purposes. It is expected that most visitors of the facility will arrive by walking, public transportation, or by means other than automobile. The results of the survey conducted at the Smith Center are included in the Technical Appendix to this report.

Based on this information, an estimation of person-trips and vehicle-trips in and out of the Health and Wellness Center was made between the hours of 6:00 AM and 12:00 midnight. These trips are outlined in Table 6.

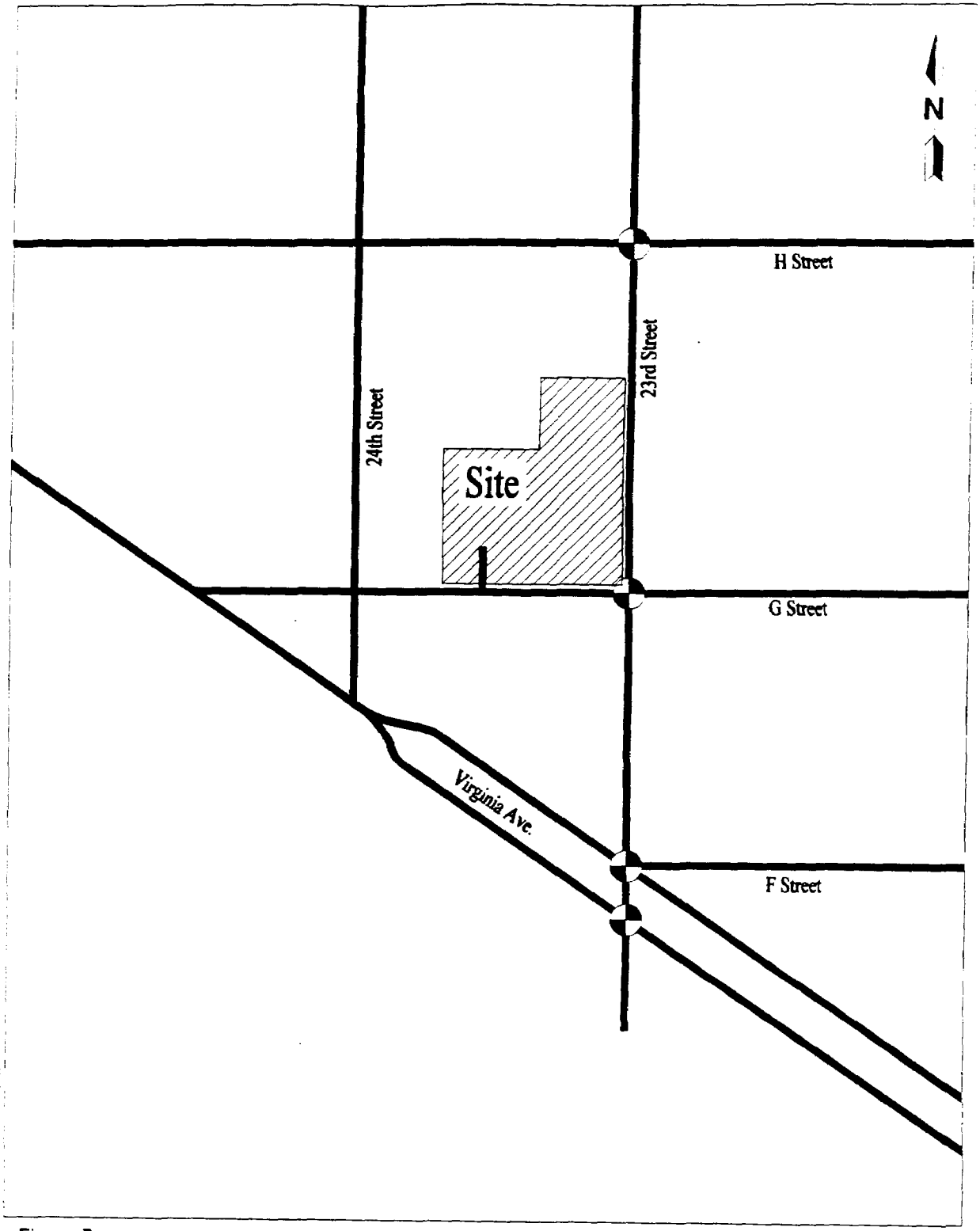


Figure 7
Future Site Access

Table 6
Vehicular and Pedestrian Trips Associated with the Health and Wellness Center

Hour	Persons In	Persons Out	Person Accumulation	Vehicles In	Vehicles Out	Vehicle Accumulation
6am	106	21	85	7	1	6
7am	75	53	107	5	4	7
8am	38	73	72	3	5	5
9am	53	56	69	4	4	5
10am	42	51	60	3	4	4
11am	56	55	61	4	4	4
12pm	63	70	54	4	5	4
1pm	56	67	43	4	5	3
2pm	72	68	47	5	5	3
3pm	89	65	71	6	5	5
4pm	99	53	117	7	4	8
5pm	138	80	175	10	6	12
6pm	154	94	235	11	7	16
7pm	170	158	247	12	11	17
8pm	80	146	181	6	10	13
9pm	45	147	79	3	10	5
10pm	19	98	0	1	7	0
	1355	1355	1703	94	94	118

As Table 6 indicates, the proposed Health and Wellness Center is expected to generate approximately 8 vehicle and 145 pedestrian trips during the AM peak hour, and 18 vehicle and 329 pedestrian trips during the PM peak hour. The peak hour of trip generation for the Health and Wellness Center is expected to be between 7:00 PM and 8:00 PM with 23 vehicle and 328 pedestrian trips. This time period is consistent with the peak hour of generation for the existing Charles E. Smith Center.

The nature of the Health and Wellness Center is such that the limited number of available equipment and facilities will limit the number of patrons that utilize the Center. Racquet ball, squash and basketball games are played where a set number of participants occupy the courts at one time. If a court is not available, patrons will either wait at the Health and Wellness Center to play, or will leave and return when the courts are not all utilized. Patrons of the facility will observe times when courts are most likely to be filled and adjust the times that they visit the Center to a time when the courts are less populated. Similarly, a maximum occupancy for fitness equipment and other facilities within the Health and Wellness center can be estimated. Table 7 calculates the maximum occupancy of the Health and Wellness Center by estimating a maximum occupancy for each use of the Center.

As the table indicates, if all facilities within the Health and Wellness Center reach their occupancy limit, then 295 people would accumulate in the building. However, the chances that all facilities and activities within the Health and Wellness Center will reach their occupancy limit at the same time are rare. Therefore, the peak person accumulation (247 patrons) listed in Table 6 is a good indicator of the number of visitors that would visit the Center.

Table 7
Occupancy Limits of Health and Wellness Center

Facility	Number of People Associated with Facility
Multi-purpose rooms	50
6 Squash courts	12
5 Racquetball courts	15
4 Basketball courts	55
Weights/Free Weights	25
Jogging track	20
Wellness Program	5
Classrooms	30
Fitness Center	30
Warm-up/Cool-down areas	12
Offices	6
Juice Bar/Social	20
Locker Rooms	15
Total	**295**

Since the new underground parking facility (140 - 145 parking spaces) is planned to have more parking spaces than the existing surface parking lot (105 parking spaces), it is estimated that the new facility may attract a few more motorists during the peak hours. It is expected that the new garage will generate 16 new vehicle and 21 new pedestrian trips in the AM peak hour, and 10 new vehicle and 13 new pedestrian trips in the PM peak hour. This is based on the conservative estimate that 40% of parking garage users would arrive during the AM peak hour, and 25% of parking garage users would depart during the PM peak hour.

The parking facility driveway and the Health and Wellness Center main entrance will both be located off of "G". The driveway will be located on the western half of the block and closer to 24th Street, and the main entrance will be located on the eastern end of the block and closer to 23rd Street. Therefore, only pedestrians approaching from 24th Street will have to cross the parking facility driveway. Most pedestrians will approach from 23rd Street and will not have to cross the driveway.

Directional Distribution

The direction of approach for motorists accessing the site from the surrounding roadways was obtained based on existing traffic within the vicinity of the site. The directional distribution for site traffic is shown on Figure 8.

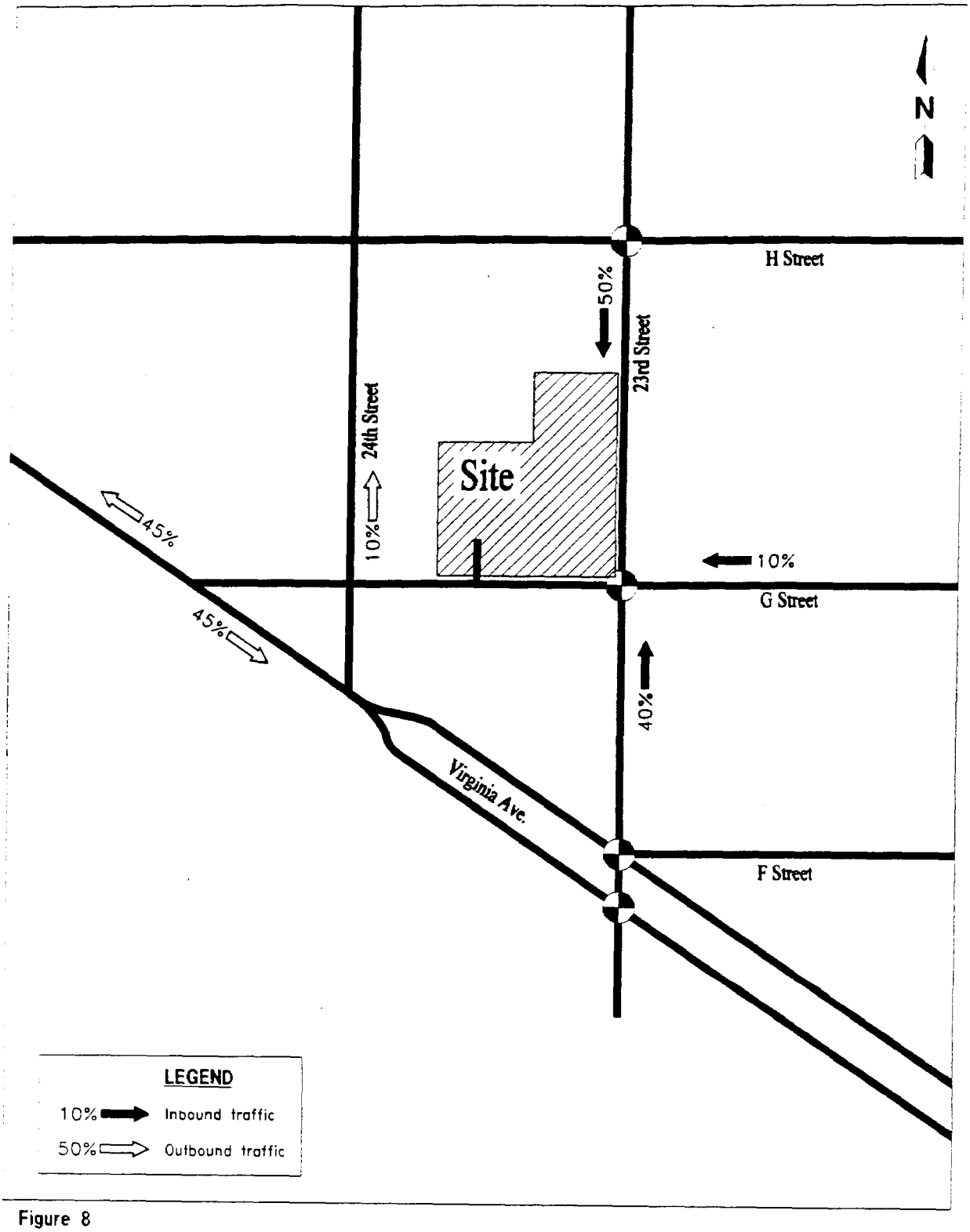
As the figure shows, 50% of Health and Wellness Center traffic is expected to arrive from the north on 23rd Street, 40% from the south on 23rd Street, and 10% from the east on "G" Street. It was assumed that traffic would return to the direction from which they arrived. The southbound traffic that arrived to the site via 23rd Street are expected to return to the south by turning left on Virginia Avenue (45%) or turning right on 24th Street (5%) to circle the block. The northbound traffic that arrived to the site via 23rd Street are expected to return to the north by turning right on Virginia Avenue. The eastbound traffic that approached the site via "G" Street is expected to turn right on Virginia Avenue (5%) or turn right on 24th Street (5%) to circle the block.

The total number of vehicle trips associated with the development of the Health and Wellness Center and the underground parking facility were distributed throughout the roadway system based on this directional distribution. The following additional assumptions were made while distributing site related trips throughout the roadway network:

- The majority of the Health and Wellness Center's visitors who will arrive by vehicle will park in the underground parking facility.

- Vehicles that currently access the surface parking lot from the 23rd Street entrance will reroute to the "G" Street entrance proposed for the underground parking facility.

Site-related volumes were distributed throughout the roadway system and are illustrated on Figure 9.



P:\1634\001.GWU\AUTOCAD\BASE.DWG
DATE LAST MODIFIED 09-16-97

Figure 8
Directional Distribution of Site Traffic

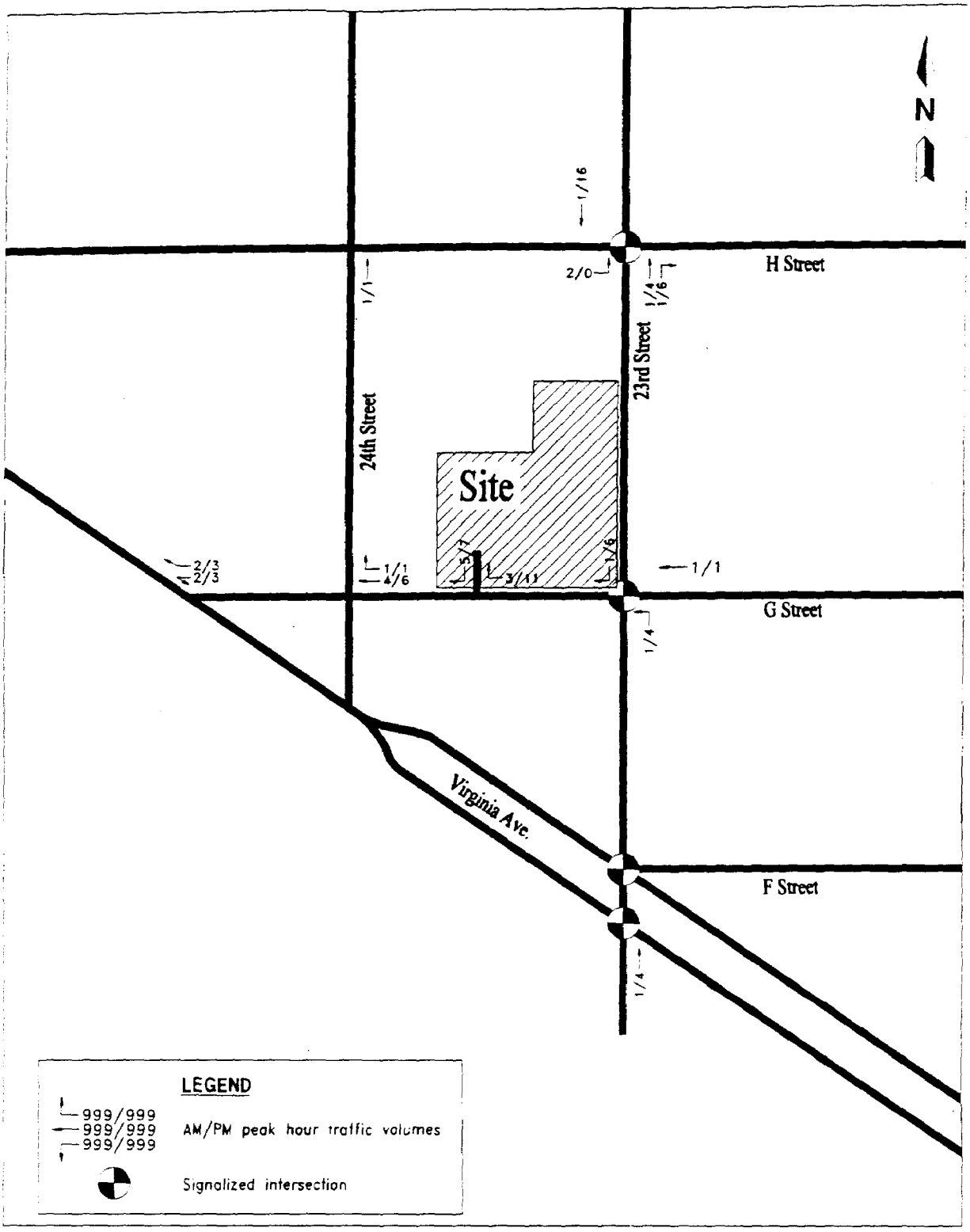


Figure 9
Health and Wellness Center Trips

Total Future Development Volumes

In order to determine the traffic volumes that will be present on the roadways in the vicinity of the Health and Wellness Center during Total Future Development Conditions, site-generated traffic volumes (see Figure 9) were added Future Background volumes (see Figure 7). These Total Future Development Conditions traffic volumes are shown in Figure 10 for both the AM and PM peak hours.

Total Future Development Conditions Capacity Analysis

A capacity analysis was performed for the year 2000 for intersections contained with the study area. AM and PM peak hour vehicle trips shown on Figure 10 were used for this analysis. This analysis considers delay to right-turning vehicles associated with increased pedestrian traffic from the Health and Wellness Center. The results of this capacity analysis are summarized in Table 8.

Table 8
Total Future Development Conditions Capacity Analysis

Roadway Intersection		Level of Service	
		AM Peak Hour	PM Peak Hour
		Delay in Seconds	Delay in Seconds
23rd Street/"G" Street	signalized	B(5.3)	B(9.4)
23rd Street/"H" Street	signalized	B(7.8)	B(13.5)
23rd Street/"F" Street	signalized	B(12.8)	C(16.7)*
23rd Street/Virginia Avenue	signalized	B(10.4)	B(10.9)*
24th Street/Virgina Avenue	unsignalized	A(0.0)	B(0.0)
Virginia Avenue/"G" Street	unsignalized	A(3.9)	D(30.4)
24th Street/"G" Street	unsignalized	A(2.1)	B(5.7)
24th Street/"H" Street	unsignalized	A(4.2)	B(6.8)

** Delay calculated using optimized signal timings.*

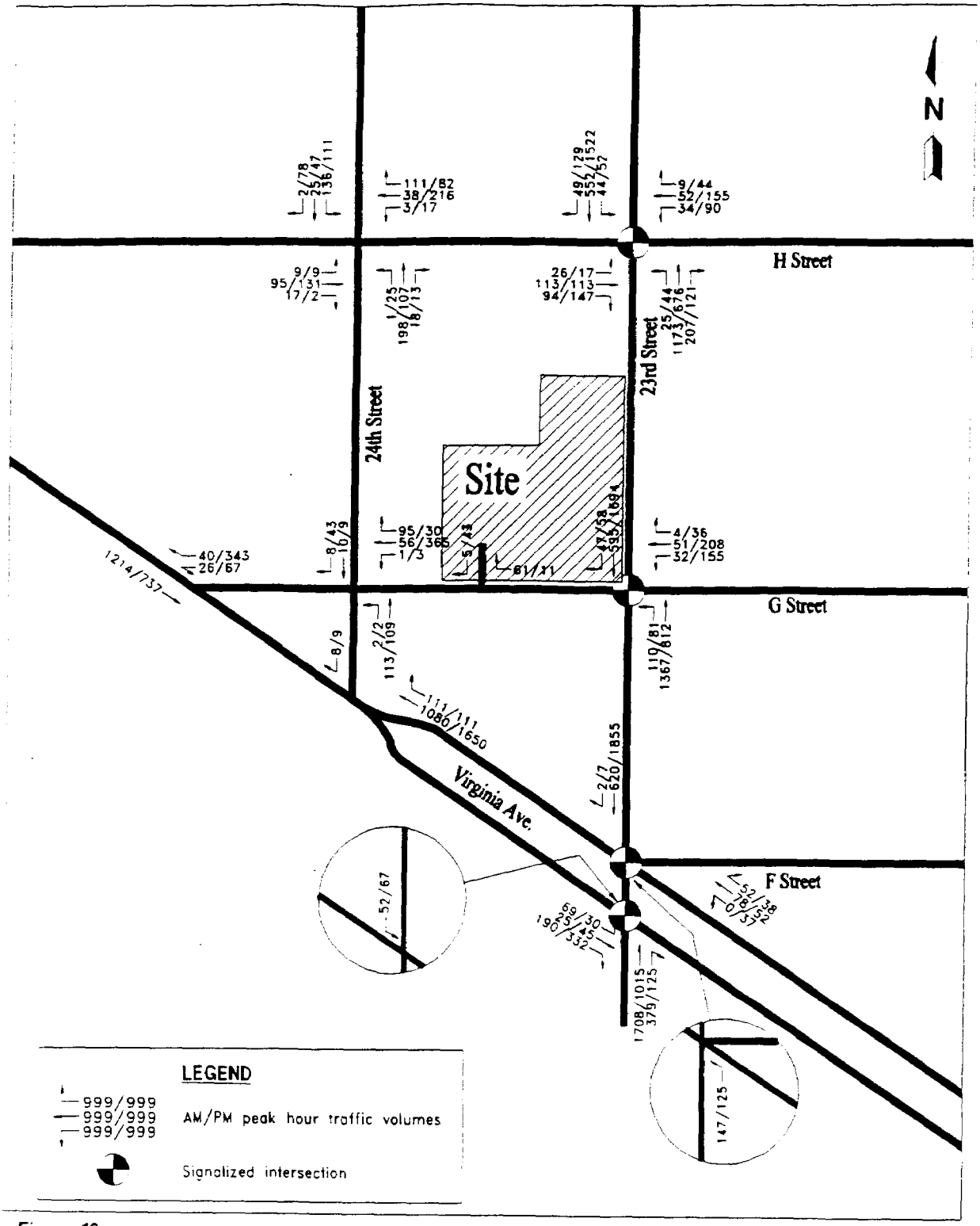


Figure 10
Total Future Peak Hour Traffic Volumes

Using existing signal timings, the 23rd Street/"F" Street intersection is expected to continue to operate at a failing level of service during the PM peak hour. However, the timings at this intersection can be changed and coordinated with the 23rd Street/Virgina Avenue intersection to result in an acceptable level of service. The timings should be altered to allow a longer green-light phase for motorists on 23rd Street, and a shorter green-light phase for motorists on Virginia Avenue. Additionally, motorists traveling north on 23rd Street should be given an exclusive five second green light phase so that motorist may turn left with a protected green arrow without having to yield to opposing southbound traffic. The new timings should be coordinated with the signal timings from other intersections so that any existing progression will continue on the roadway system.

In the analysis conducted with optimized signal timings, the level of service is expected to be "C" at the 23rd Street/"F" Street intersection, and a "B" at the 23rd Street/Virgina Avenue intersection.

All other intersections within the site area are expected to operate at acceptable levels of service during both the AM and PM peak hours.

Total Future Parking Inventory

The University recognizes the residential community's concern with a high use of on-street parking. The University is planning (subject to BZA approval) to develop an additional 20-25 surface lot parking spaces on G Street west of 23rd Street. These spaces will not be considered part of the campus parking inventory since they will be located outside of the defined campus-boundaries. These spaces will be considered overflow spaces, but will probably be utilized similar to existing campus spaces within campus boundaries.

The planned parking lot will be located convenient to the Health and Wellness Center and will help to reduce on-street parking within the residential area near the proposed Center.

The development of the Health and Wellness Center will consist of adding 40 net parking spaces on The GWU campus. This increase will result in a total of 2,882 parking spaces within the campus boundaries. This is in accordance with *The Campus Plan's* approved range of 2,700-3,000 parking spaces.

CONCLUSION

The Health and Wellness Center is planned to be developed on the western edge of The George Washington University's campus in northwest Washington D.C. It will be located at the northwest corner of 23rd and "G" Streets Northwest.

The Health and Wellness Center will include approximately 105,103 GSF of program space. The facility is planned to be developed by the year 2000.

The proposed Health and Wellness Center is planned to be developed at the current location of an existing surface parking lot. The Health and Wellness Center will be designed with three levels of below-grade structured parking (140 - 145 spaces) that will replace the total number of existing parking spaces (105 spaces).

The Health and Wellness Center will be designed as an attraction for potential students of The George Washington University. Currently, the Charles E. Smith Center, provides minimal health and fitness related activities for members of the campus. The development of an advanced state-of-the-art Health and Wellness Center will allow the University to remain competitive with local area universities who currently have facilities such as the proposed Health and Wellness Center.

The following intersections were included in this study:

- 23rd Street/"G" Street, NW
- 23rd Street/"H" Street, NW
- 23rd Street/"F" Street, NW
- 23rd Street/Virginia Avenue, NW
- 24th Street/Virgina Avenue, NW
- Virginia Avenue/"G" Street, NW
- 24th Street/"G" Street, NW
- 24th Street/"H" Street, NW

Volumes projected from 1993 to 1997 were used as existing volumes. The AM and PM peak hours were determined to be 8:15 AM - 9:15 AM and 5:30 PM - 6:30 PM respectively.

Based on these existing volumes, capacity analysis were performed for existing conditions. The results of the analysis indicate the following:

- 23rd Street/"F" Street intersection currently operates at a failing level of service during the PM peak hour. This is due to the high volume of commuter traffic that utilizes 23rd Street while traveling south toward Interstate 66 (major roadway towards Northern Virginia) from the business district north of Pennsylvania Avenue. However, the 23rd Street/"F" Street intersection operates at a Level of Service "B" during the AM peak hour.
- All other intersections within the site area currently operate at acceptable levels of service during both the AM and PM peak hours.

The George Washington University, BZA inventory, consists of 2,849 off-street parking spaces. Recent projects on campus resulted in a loss of seven spaces. The resultant number of parking spaces (2,842) is in accordance with *The Campus Plan*.

The development of the Health and Wellness Center proposes relocating the driveway entrance from 23rd Street to "G" Street. Relocating the entrance will help to minimize impacts due to site generated vehicular traffic

Existing 1997 through traffic volumes on 23rd Street were grown 2% per year for three years to account for growth resulting from increased commuter and University traffic. Traffic associated with the 2200 "M" Street development was also added to existing volumes to obtain Future Background volumes.

The proposed Health and Wellness Center is expected to generate approximately 8 vehicle and 111 pedestrian trips during the AM peak hour, and 18 vehicle and 248 pedestrian trips during the PM peak hour. The peak hour of generation for the Health and Wellness Center is expected to be between 7:00 PM and 8:00 PM with 23 vehicle and 328 pedestrian trips.

The underground parking facility (140 - 145 parking spaces) that is planned to replace the parking spaces on the existing surface parking lot (105 parking spaces) is estimated to generate 16 new vehicle and 22 new pedestrian trips in the AM peak hour, and 10 new vehicle and 13 new pedestrian trips in the PM peak hour.

A capacity analysis was performed for the year 2000 for intersections contained with the study area. The results of the analysis indicate the following:

- Using existing signal timings, the 23rd Street/"F" Street intersection is expected to continue to operate at a failing level of service during the PM peak hour. However, the timings at this intersection can be changed and coordinated with the 23rd Street/Virgina Avenue intersection to result in an acceptable level of service.
- All other intersections within the site area are expected to operate at acceptable levels of service during both the AM and PM peak hours.

The development of the Health and Wellness Center will generate a relatively small amount of traffic. The facility is expected to act mainly as an intermediate stop for visitors who would have already been on The George Washington University campus.

The Health and Wellness Center can be accommodated by the existing transportation system and facilities.

At the time of the completion of the proposed Health and Wellness Center there will be 2,882 total parking spaces on campus (33 more than current BZA inventory). This number is in accordance with *The Campus Plan's* approved range of 2,700 - 3,000 parking spaces.

Future projects which are currently planned on-campus will not cause an increase in student enrollment and are not expected to cause increases in pedestrian or vehicular traffic.

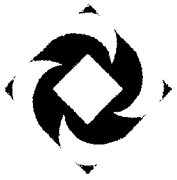
F

THE GEORGE WASHINGTON UNIVERSITY

LERNER HEALTH & WELLNESS CENTER

PROJECT MEMORANDUM

NOVEMBER 13, 2002



BRAILSFORD & DUNLAVEY
Facility Planners • Project Managers
Catalysts for Building Communities

WWW.FACILITYPLANNERS.COM

Table of Contents

I. Introduction

II. Review of Existing Data

III. Background Information Regarding Brailsford & Dunlavey

IV. Latest Trends in Campus Recreation Centers

V. Do Other Centers Provide Access to Community and Alumni Members?

VI. What are Typical Hours for a Campus Recreation Center?

VII. If the BZA Conditions Were Lifted, What Types of Groups Would Utilize the LHWC?

VIII. What Kind of Impact Would these Users Have on the Overall Building Utilization?
   a. Daily Usage
   b. Weekly Usage
   c. Monthly Usage

IX. What Would be the Impact of the Building if Community Members Were Allowed to Purchase Memberships?

X. What Kind of Impact Would Expanding the Building's Hours Have?

XI. What Would Be the Impact of Allowing Member Guests (i.e. parents, visiting scholars, etc.) to Utilize the Building?

XII. What Kind of Impact Would Allowing Intercollegiate Squash Have on the Building?

I. Introduction

In the Fall of 2002, The George Washington University ("GWU") retained Brailsford & Dunlavey ("B&D") to review the impact of potential zoning changes on the Lerner Health & Wellness Center ("LHWC"). The 189,000 gross square feet recreational facility opens and closes at 7:00 am and 10:00 pm, respectively, on weekdays, and 11:00 am and 8:00 pm, respectively, on Sundays. The University requests the Board of Zoning Adjustment ("BZA") to allow it to extend the closing until 1:00 am on all days except Saturday, when the facility will still close at 10:00 pm. Further, the BZA had conditioned LHWC membership so that only GWU students and faculty/staff of the Foggy Bottom Campus can utilize the facility.

II. Review of Existing Data

For this study, B&D utilized a combination of data provided by the University and national and regional trend data for comparable facilities on similar campuses.

Key data used in the analysis included:

- Daily, weekly, and monthly traffic counts of the LHWC provided by the GWU GWorld Office
- President's Club membership demographic information
- Review/Description of the current operating information and policies of the LHWC & The Smith Center
- Meeting with appropriate University staff
- Policies and membership information from comparable facilities on similar campuses
- Tour of existing GWU athletic and recreation facilities.

III. Background Information Regarding Brailsford & Dunlavey

Brailsford & Dunlavey ("B&D") is a facility planning and project management firm dedicated to serving major educational institutions, municipalities, public agencies, and other clients developing public assembly, sports, recreation, and entertainment facilities. To date, Brailsford & Dunlavey has consulted on over 100 sports and recreation projects in the United States. Our projects include the planning and programming of the GW Health & Wellness Center, the assistance with the 2012 Washington Baltimore Olympic Coalition Bid Package, Washington, DC Baseball site selection, the National Cathedral School's new athletic facility, Prince Georges County's Sports & Learning Complex, DePaul University's Ray Meyer Recreation Center, University of Maryland's Student Recreation Center, and Duke University's Student Recreation Center, just to name a few. In addition, B&D's sister company, Centers, Inc. manages major recreational facilities across the country and provides B&D with various usage reports and trend data for campus recreation centers.

Brailsford & Dunlavey's staff hails from diversified backgrounds in economics, architecture, urban planning, finance, marketing, and management. Over the course of our careers, we have planned and managed hundreds of millions of dollars' worth of sports development projects throughout the United States.

The following is our response to specific questions asked by the University.

IV. What are the latest trends in campus recreation centers? Is it important for a University recreation center to allow community users?

The United States has seen significant growth in the amount of recreational facilities built on college campuses over the last ten years. According to the National Intramural Sports & Recreation Association ("NIRSA"), there are currently over $4.4 billion dollars worth of development projects on student recreation centers across the country. The following are the reasons why these facilities have gained in popularity over the last ten years:

a. Campuses nationwide are home to a more active student body, with an improved awareness of the benefits of physical fitness, exercise and nutrition.
b. Schools have begun to recognize that these facilities can be successful recruiting tools.
c. These buildings support the University's mission by providing a healthy mind, body and spirit for the entire University community.
d. These buildings can assist in improving "town-gown" relationships and goodwill by allowing community and alumni access to the various facilities, services, and programs. This is often a "win-win" because the community users can complement the University use during non-peak times.

V. Do other similar institutions provide access to community and alumni?

A review of eight other similar urban institutions revealed that many schools offer various membership options for the community and alumni. The following chart shows a list of eight urban institutions that have similar recreational facilities:

University	Facility Name	Community Memberships?	Alumni Memberships?	Member Guests?
The George Washingon University	***Lerner Health & Wellness Center***	***no***	***no***	***no***
American University	William I Jacobs Fitness Center	yes	yes	yes
DePaul University	Ray Meyer Recreation & Fitness Center	yes	yes	yes
Georgetown University	Yates Field House	yes	yes	yes
NYU	Coles Sports and Recreation Center	yes	yes	yes
Tulane University	Reily Recreation Center	yes	yes	yes
UCLA	Wooden Center	no	yes	yes
University of San Francisco	Koret Health and Rec Center	yes	yes	yes
University of Miami	Smathers Recreation Center	no	yes	yes

Of the eight similar schools researched, six out of eight (75%) provide memberships to the community, while all eight (100%) provide access to alumni and member guests.

Each institution stated that the reason why they offer outside memberships is to:

1. Improve the overall building utilization especially during non-peak times.
2. Support the town-gown relationship.
3. Enhance the programs offered in the facility by using the revenue generated by these groups to add additional services and programs, and to improve the alumni support.

For the most part, the schools do not provide on-site parking for community users. Rather, each community member generally lives or works in the area, and walks or rides public transportation to the center.

VI. What are typical hours for a campus student recreation center?

Typically, most schools open at 6:00 am and close at 11:00 pm or midnight. A recent trend at some institutions is providing additional late night programming options to their students. This includes expanding recreation center operating hours until 1:00 am or 2:00 am to provide a healthy alternative to students going to bars or drinking alcohol. (Recent surveys conducted at Dartmouth College showed that over 50% of the students were still awake at 3:00 in the morning.) The following chart shows the operating hours for various campus recreation centers. The LHWC is the only facility open less than 100 hours per week. In addition, seven of the eight facilities (88%) open earlier and close later during the week than the LHWC.

		Building Hours				
University	Facility Name	Monday-Thursday	Friday	Saturday	Sunday	Total Hours Open / Week
The George Washingon University	***Health & Wellness Center***	***7:00am-10:00pm***	***7:00am-10:00pm***	***7:00am-10:00pm***	***11:00am-8:00pm***	99
American University	Jacobs Fitness Center	6:00am-10:30pm	6:00am-8:30pm	8:30am-6:30pm	10:30am-8:30pm	101
DePaul University	Ray Meyer Center	6:00am-11:00pm	6:00am-10:00pm	8:00am-10:00pm	8:00am-10:00pm	112
Georgetown University	Yates Field House	6:30am-midnight	6:30am-10:00pm	9:00am - 10:00pm	9:00am - 10:00pm	112
NYU	Coles Recreation Center	7:30am-11:00pm	7:30am-11:00pm	8:45am-5:00pm	8:45am-11:00pm	100
Tulane University	Reily Recreation Center	6:00am-11:00pm	6:00am-10:00pm	8:00am-8:00pm	8:00am-10:00pm	110
UCLA	Wooden Center	6:00am-11:45pm	6:00am-9:45pm	9:00am-5:45pm	9:00am-9:45pm	109
University of Miami	Smathers Recreation Center	6:30am-midnight	6:30am-midnight	8:00am-10:00pm	8:00am-10:00pm	116
University of San Francisco	Koret Rec Center	6:00am-10:00pm	6:00am-10:00pm	8:00am-8:00pm	8:00am-8:00pm	104

Source: website and telephone conversations with operators

VII. If the BZA conditions were lifted, what types of groups would utilize the Health and Wellness Center?

Across the country, these buildings support community outreach & alumni support. For the most part, the people interested in joining a recreation facility either live or work within a five-minute walk of the facility. Based upon our experience, there are many groups in the Foggy Bottom area that would benefit from use of the LHWC. These groups include St. Mary's Court, St. Mary's Church, The Remington, and Schools without Walls, just to name a few. Many of these groups currently use the Smith Center, which does not have the same capacity, facilities, and programs as the LHWC. Since these groups are already located in the Foggy Bottom area, there would be minimal impact on traffic.

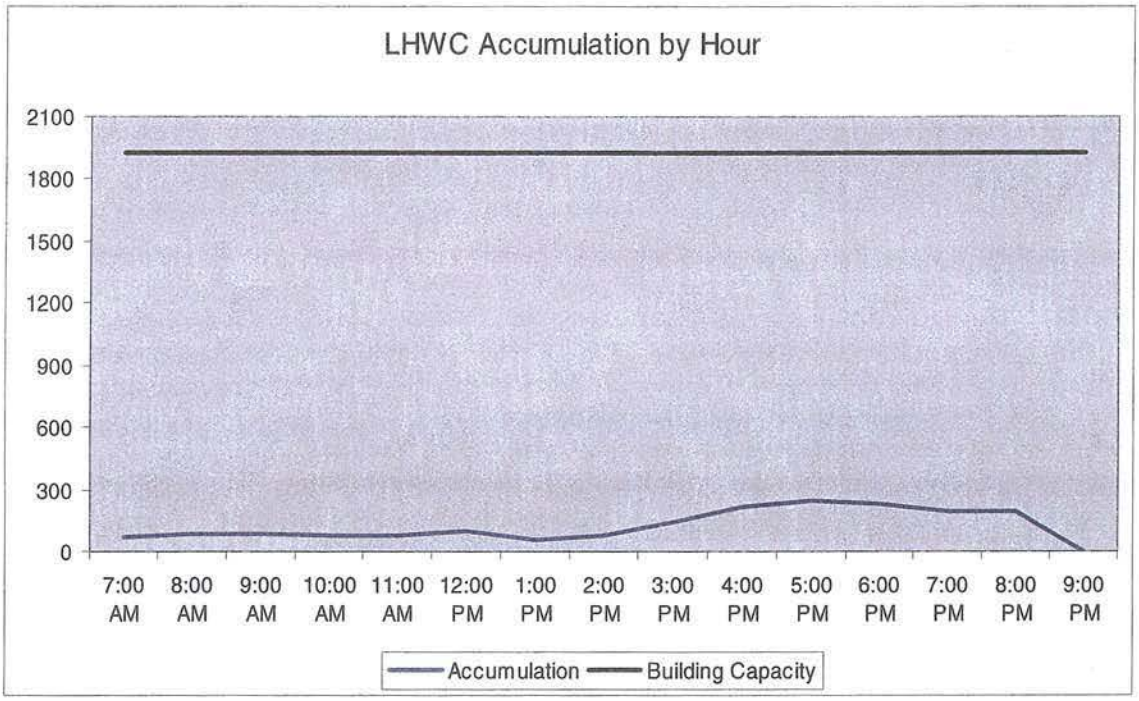
It is clear that by allowing outside members into the LHWC, that the Smith Center could become more functional and improve its overall utilization. Currently, outside groups such as the President's Club and Schools without Walls utilize the Smith Center facilities and locker rooms. By moving some of the groups out of the Smith Center, the building can incur a much needed renovation and become more functional for the Department of Athletics & Recreation.

VIII. What kind of impact would these users have on the overall building utilization?

To answer this question, B&D reviewed the current usage of the LHWC from data collected by the GWorld Office. Since the building has a secured entrance (an active GWorld card is needed to enter the facility) users must swipe their card to gain access into the facility. An exit survey was also performed as people left the facility. Usage data was analyzed on a daily, weekly, and monthly basis.

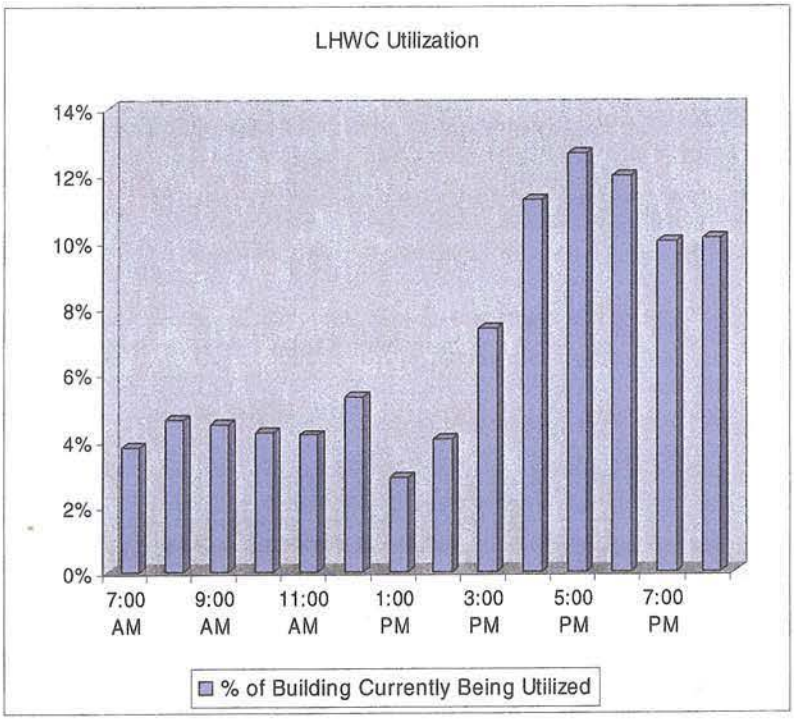
A. Daily Use

The graph below shows a typical patron accumulation by hour of the day alongside the building's capacity of 1,927 users at any one time (as determined by the Fire Marshall). The data used is the average day of a typical weekday use (Monday-Thursday). The data was collected from users utilizing their GWorld Card upon entering the LHWC during the week of September 15th, 2002, which is a typical week for the facility.



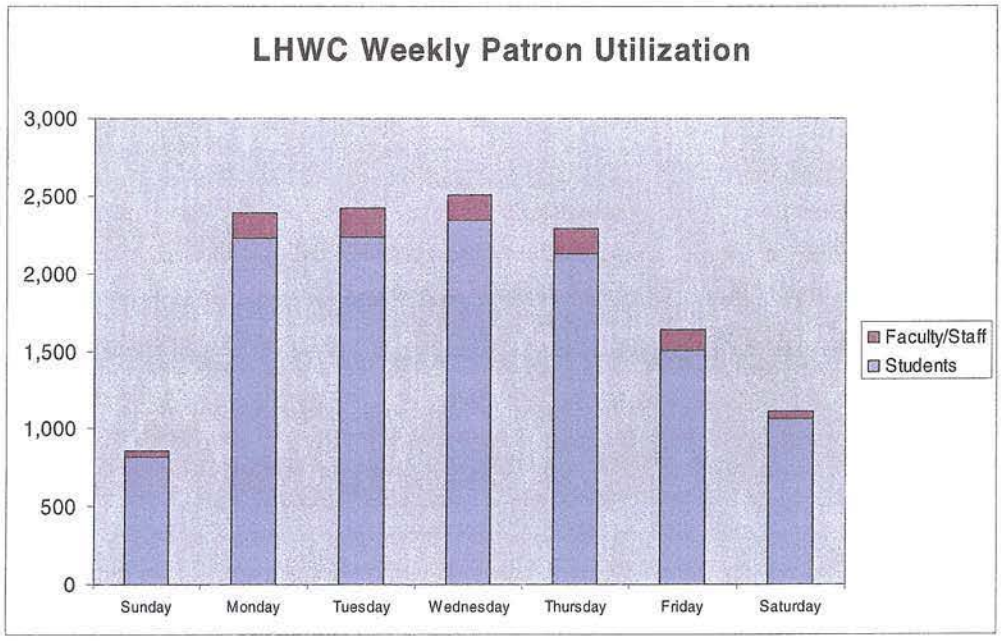
Source: GWorld Data

The building is generally slower in the morning and early afternoon and busier in the evening after 4:00 pm. The largest accumulation of people (243) were in the building from 5:00 pm to 6:00 pm, which is typically the most popular time for students to use a campus recreation center. Even during this peak period, however, the building was less than 15% utilized, as shown in the graph below:



B. Weekly Use

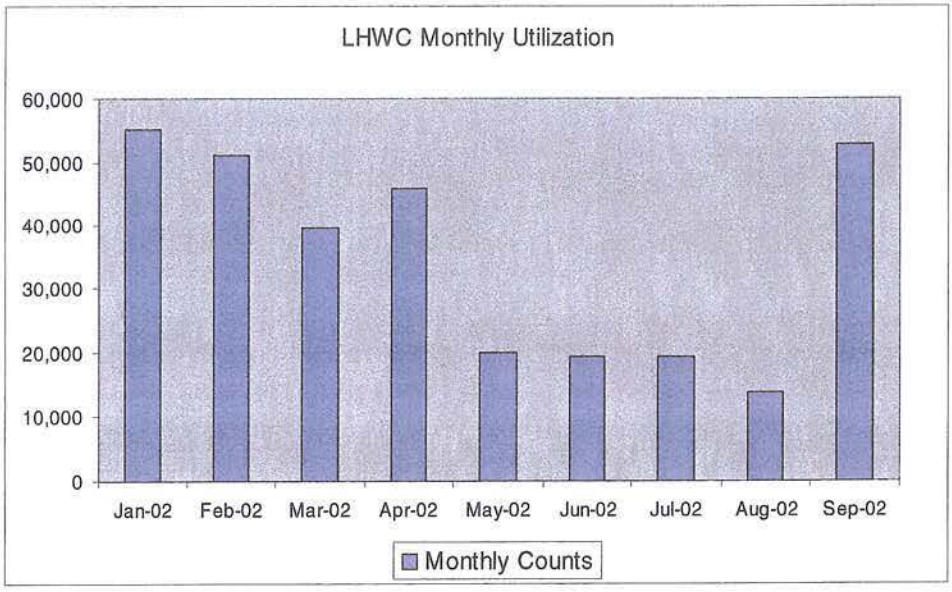
The graph below shows the typical use of the LHWC by day of the week. The data was collected from users utilizing their GWorld Card upon entering the LHWC during the week of September 15, 2002, which is a typical week for the facility.



Wednesday was the building's most popular day, with approximately 2,507 users entering the facility. The building's use on the weekends falls considerably, with only 853 people on Sunday and only 1,100 people on Saturday. It is important to note that students use accounts for approximately 93% of the total users. Faculty/staff usage is the remaining 7%. Currently, no other users are allowed access to the building.

C. Monthly Use

The graph below shows the monthly usage of the LHWC from January 2002 through September 2002.



During the peak month of January, the building accommodated approximately 55,000 users. The average use per month during the school year is approximately 49,000 users. Summer use is less than 50% of the average, resulting in about 18,000 users per month during May through August.

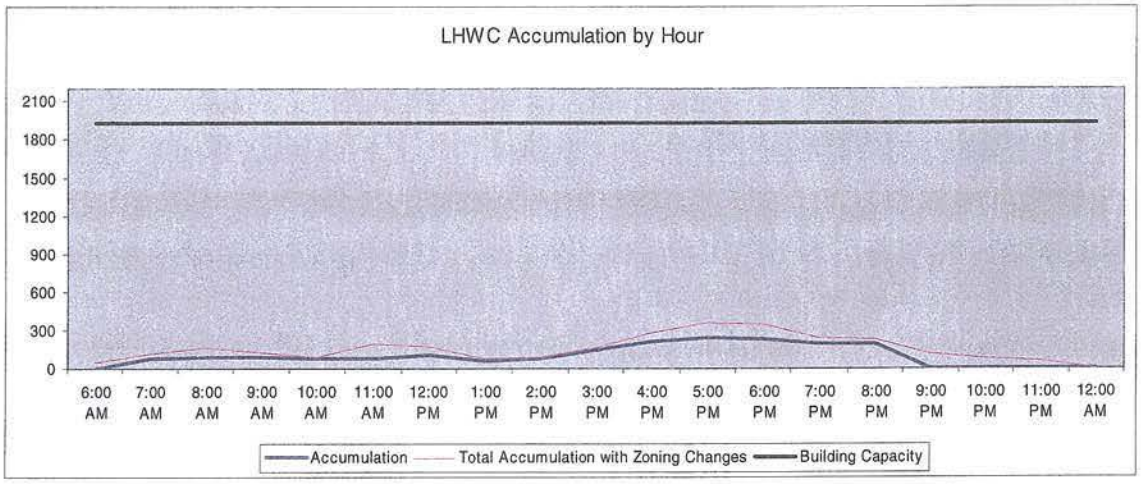
Building Utilization Summary

It is clear from the charts presented above that the building is not optimally utilized. While no comparable facility is 100% utilized, a utilization rate of between 15-25% is not uncommon for a similar facility. The major difference in utilization between the LHWC and other similar facilities is that other buildings can supplement the student and faculty use with outside members, who will often utilize the building during downtimes.

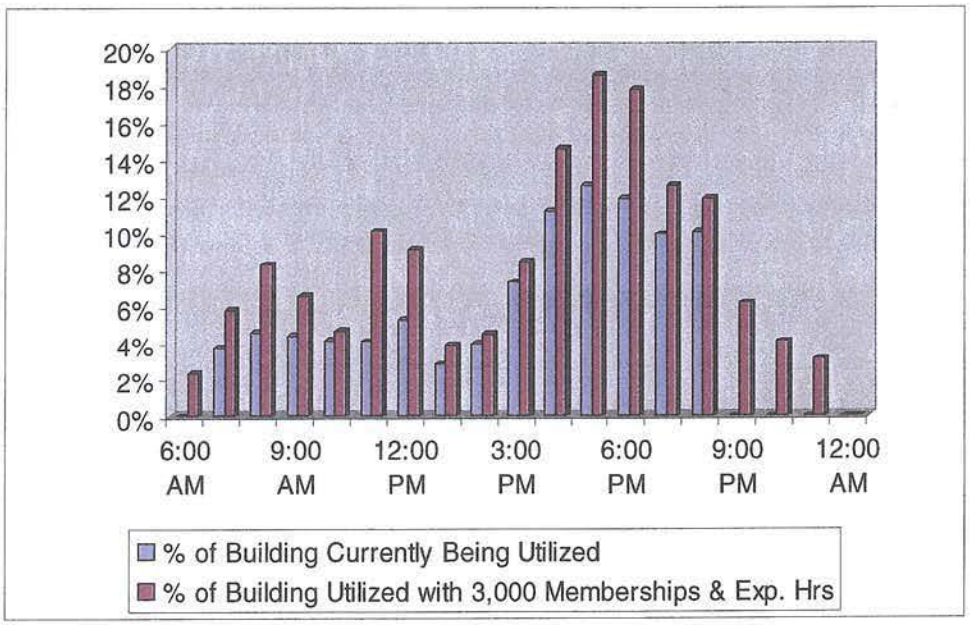
IX. What would be the impact of the building if community members were allowed to use the facility?

B&D was asked to project the building utilization if the facility was open to the local community and alumni. To perform this analysis, B&D had to make some assumptions regarding the number of building memberships. Based on discussion with the University, a number of 3,000 additional memberships were assumed. (The actual memberships would probably be significantly less (for example, the University has only 86 community members in its President's Club) but for purposes of this patron utilization analysis, this was a good, conservative estimate. It is also assumed that 32% of the members utilize the building on a typical weekday (Monday-Thursday) and 13% will utilize the building on a weekend (Friday-Sunday), with an average daily utilization of 25%. This is comparable to current data on the President's Club as well as other similar facilities. For example, DePaul University's Ray Meyer Center has approximately 3,000 non-student members and they get about 800 non-student members per weekday (27%). It was also assumed that the new member's daily activity trends would not mirror the daily trends of the existing LHWC patrons. Based on survey responses from the President's Club at the Smith Center as well as comparable facilities, a daily activity profile was generated for the new members, which shows more concentrated usage in the morning, lunch hour, and evening.

a. Daily Use

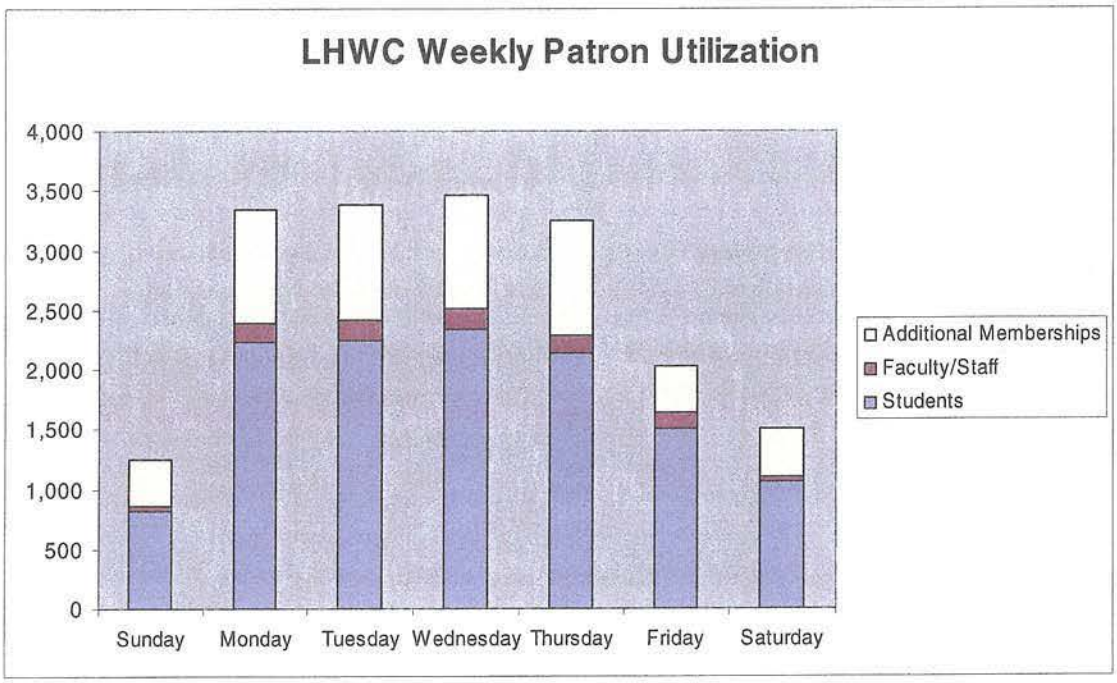


As the graph above shows, the overall building utilization would not come close to the overall building capacity of 1,927. During the peak time of 5:00 pm to 6:00 pm, the building would only have 358 people entering or approximately 19% of the overall building's capacity. In addition, extending the hours of operations would not significantly increase activity at the LHWC. (This is discussed more in Section X.) The overall building utilization is shown in the graph below:

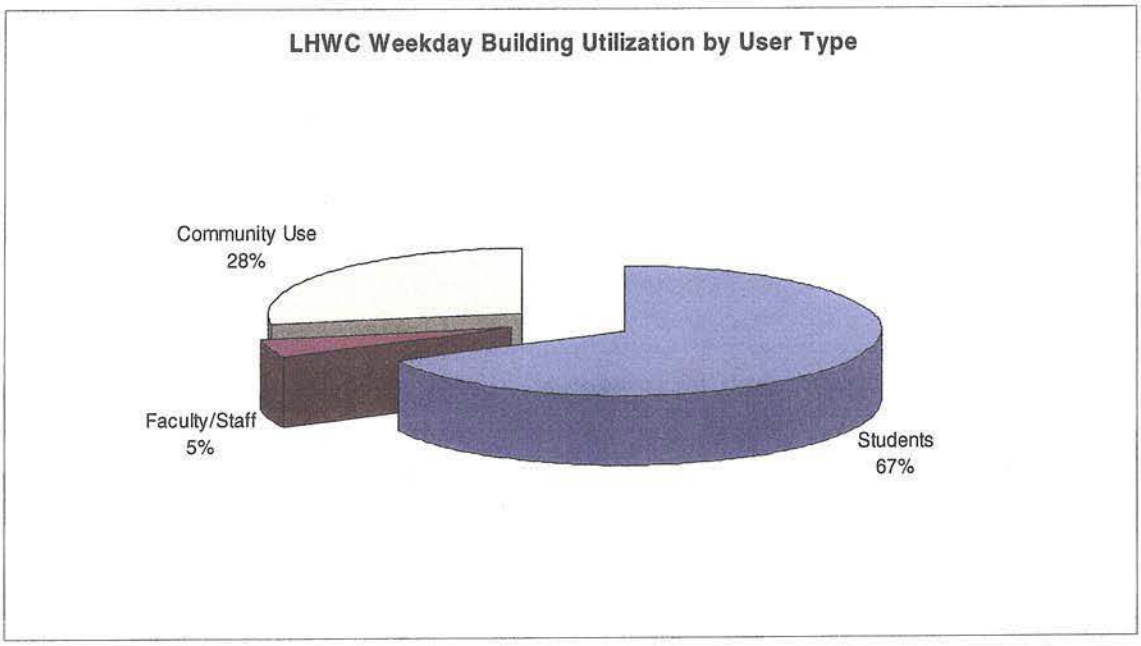


b. Weekly Use

Utilizing the current per day usage pattern, the graph below shows the amount of estimated users per day of the week.

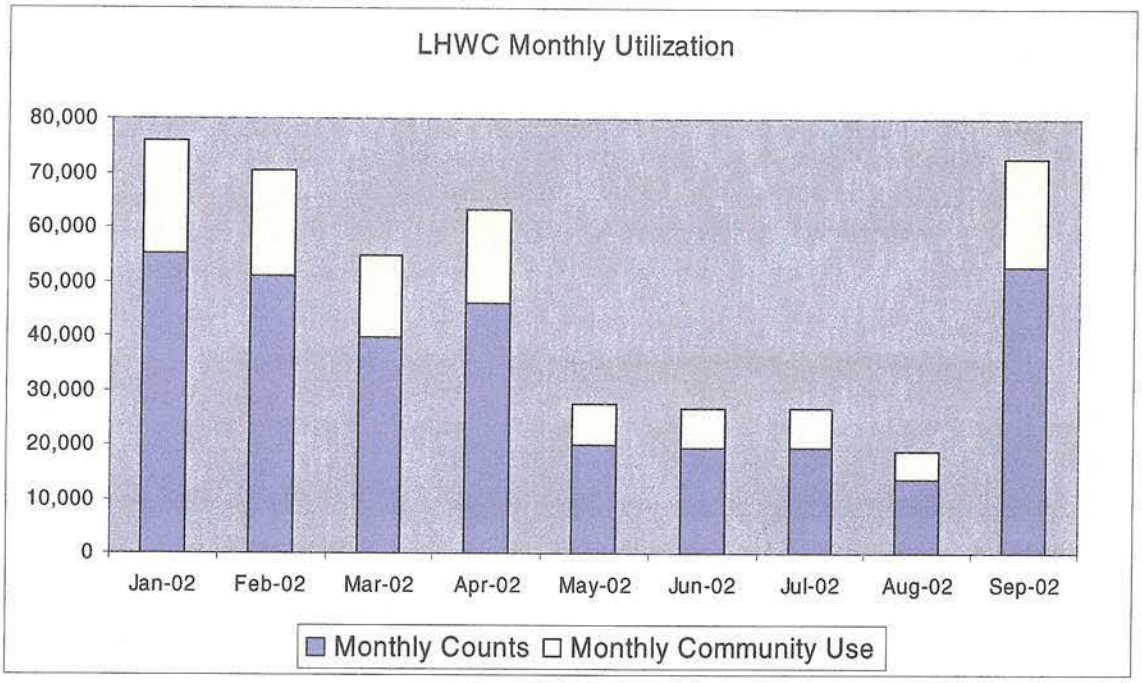


The highest usage pattern is on Wednesday, when the building has approximately 3,467 visitors. The slowest day is Sunday, when only 1,243 people utilize the building. It is interesting to note that even with 3,000 outside memberships, the community use is only 28% of the overall building users, as shown in the graph below:



c. Monthly Use

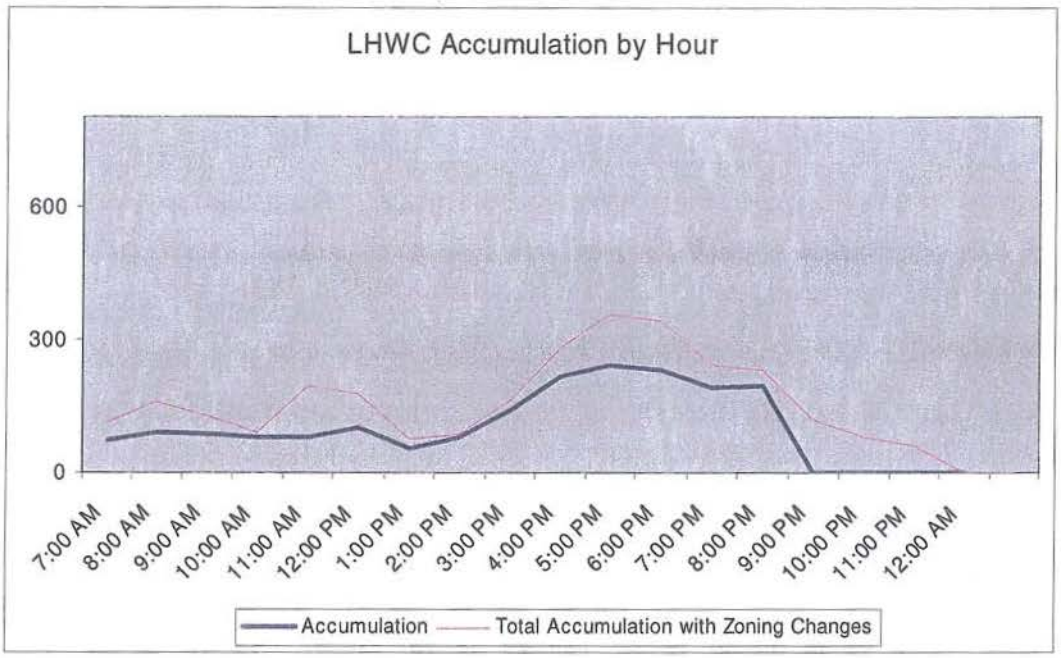
Utilizing the current weekly usage pattern (with the assumption of 28% of the daily visitors being community members), the graph below shows the amount of estimated users per month.



As you can see from the above charts, allowing outside members would improve building utilization but would not significantly impact the overall building use. Students would still represent over two-thirds of the building's users.

X. What kind of impact would expanding the building's hours have?

Keeping the building open later in the evening would not significantly impact traffic patterns. In general, late night activity is driven by the campus intramural schedule and not drop in activity. The majority of these users would be existing GWU students as shown in the graph below:



XI. What would be the impact of allowing member guests (i.e. parents, visiting scholars, etc.) to utilize the building?

Member guest would have minimal impact on the overall utilization of the LHWC. For most campus recreation centers, this group represents less than 1% of the overall building traffic. Assuming 3,000 people utilize the building on a given day, the LHWC would likely see an additional 30 guests.

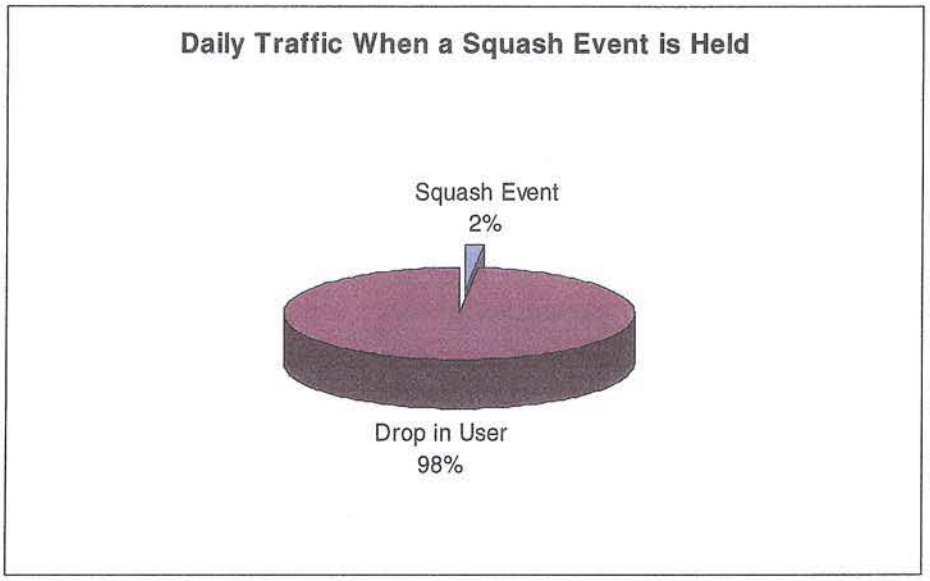
XII. What kind of impact would allowing intercollegiate squash have on the building?

Currently, the LHWC has six international squash courts. It is the University's intent to use these courts for their new Intercollegiate Athletic Men's and Women's Squash teams. For the past 25 years, squash was a men's club sport for the University, played in older, less functional, squash courts at the Smith Center. The newer international squash courts at the LHWC will allow the University to attract and recruit some of the best international squash players. In addition, the expansion of a women's squash team will assist the University in complying with the gender requirements as outlined in Title IX.

Traffic Impact

Squash events would not have any noticeable impact on traffic into or around the building. The squash season is from October to March and a school generally has approximately 15 members per team. Simply put, squash events do not attract a significant fan base. In fact, there is no central gathering place or seating in the building for fans to even watch the matches. The traffic would simply be the team's players and

coaches, estimated at about 30-40 people per event. These people would account for less than 2% of the average daily traffic into the building as shown in the graph below





The George Washington University
WASHINGTON, D.C.

HEALTH AND WELLNESS CENTER
Special Exception Transportation Impact Summary
WASHINGTON, DC

Prepared by

Gorove/Slade Associates, Inc.
1140 Connecticut Avenue NW
Suite 700
Washington, D.C. 20036
202-296-8625

November 15, 2002

MEMORANDUM

TO:	Abdoulaye Bah	DDOT
	Heather Brophy	DDOT
FROM:	Robert Schiesel	
	Nicole White, P.E.	
	Louis Slade, P.E., PTOE	
DATE:	November 15, 2002	
SUBJECT:	GW Health and Wellness Center – Special Exception	
	Transportation Impact Summary	

INTRODUCTION

This technical memorandum summarizes the transportation-related impacts associated with the following proposed zoning regulation changes to the Lerner Health and Wellness Center (LHWC) at The George Washington University (GW):

- Extending operating hours until 1:00 a.m. on all days except Saturdays
- Deleting the restriction on the classes of users that are currently permitted to use the facility

Two fitness-related facilities are located on the GW campus. The Theodore and Annette Lerner Family Health and Wellness Center is located at the corner of 23rd and G Streets. The 189,000 square foot center opened for use by GW Foggy Bottom faculty, staff and students in August 2001. The Charles E. Smith Center serves as the home of the Department of Athletics and Recreation. It is mainly used for intercollegiate athletics, recreation and club sports, although some alumni and friends of the University can use the fitness facilities. Alumni can use the Smith Center fitness facilities for a fee during the summer months, and free on weekends throughout the academic school year. In addition, some alumni and University supporters purchase special memberships in the Smith Center's President's Club. President's Club users pay a one-time initiation fee and an annual membership fee. President's club users are permitted to use the Smith Center fitness facilities during all operating hours. Alumni, community members and friends of the University are not currently permitted to use the LHWC. Both facilities are examined in this analysis because some of the new users that would be permitted to use the LHWC after the proposed zoning changes are currently using the President's Club at the Smith Center.

The following sections of this memorandum describe the existing operations of the LHWC and the Smith Center, the proposed changes to their operations, and a traffic impact analysis of these changes.

BACKGROUND

The following section of the report summarizes the existing operations of two fitness facilities on the GW campus, the LHWC and the Smith Center, and how the proposed zoning changes would alter their operations.

Existing LHWC Operations

The GW LHWC is a state-of-the-art fitness facility currently used by students, faculty and staff of the Foggy Bottom campus. Facilities and amenities available for use in the LHWC include the following:

- Numerous gymnasia and courts capable of hosting basketball, volleyball, badminton, indoor soccer, indoor hockey, racquetball and international squash
- A three-lane suspended jogging track
- A three-lane lap pool
- A fitness suite that includes large free weight, fitness, wellness and cardiovascular fitness areas
- A large sub-dividable multipurpose area used for aerobics, dance, yoga, martial arts and other functions

The LHWC is open seven days a week between the hours of 7am and 10pm Monday through Saturday (The LHWC is planning to start opening at 6am), and 11am to 8pm Sunday, and if fully utilized has the potential to serve 1,973 patrons at once, based on existing fire code. A typical weekday at the LWHC attracts close to 2,400 patrons. Most of these users are students, who represent 93% of the total. The peak hour of traffic in and out of the LHWC is 6pm to 7pm with approximately 500 people entering or leaving the facility. The peak time of usage of the LHWC is 6pm when there are approximately 250 people in the facility, or 12% of the facility capacity.

Existing Smith Center Operations

The Charles E. Smith Center serves as the home of the Department of Athletics and Recreation. It is mainly used for intercollegiate athletics, recreation and club sports. The facility hosts a variety of activities, such as basketball, volleyball, badminton, indoor soccer, swimming, diving water polo teams, scuba-diving classes, racquetball, squash courts, and tennis. Fitness facilities include aerobics, exercise bikes, a running track, free weights and universal weight machines.

In addition to student athletes, GW alumni and President's Club members can access the Smith Center for fitness and recreation. GW alumni are permitted to access the Smith Center after 5pm on Friday and 12pm to 6pm on Saturdays and Sundays, subject to building availability. During the summer months (May through August), alumni are permitted to purchase access packages to the facility for themselves and family members. President's Club members are Smith Center

users that are permitted premium amenities, locker space and usage of the Smith Center in return for a fee. Currently, there are 86 President's Club members at the Smith Center. President's Club facilities also exist at the LHWC, serving GW faculty and staff President's Club members only.

Proposed Changes

GW is seeking a change in the LHWC zoning regulation (Board of Zoning Adjustment Order No. 16276) to allow the following:

- The addition of new member types to the LHWC other than Foggy Bottom students, faculty and staff. These new members would include community residents, GW students from other campuses, alumni, and friends of the University. (NOTE: Alumni and President's Club members that currently use the Smith Center would transfer to the LHWC. The Smith Center space once used by the President's Club would be renovated to enhance already existing Smith Center amenities [i.e. expanded varsity team locker rooms, expanded medical training rooms, storage space]).

- The extension of LHWC operation hours from 10pm to 1am on Monday through Friday, and from 8pm to 1am on Sunday. Hours of operation on Saturdays would remain the same; and

- The LHWC would be available to host intercollegiate squash matches.

EXISTING CONDITIONS

This section of the memorandum describes the existing traffic and parking conditions of the LHWC and President's Club users of the Smith Center.

Existing Patron Activity

Patron activity data was collected over the course of a week from Monday, September 16 through Sunday, September 22, 2002. Entering patrons were counted each hour using GWorld ID readers[1]. Exiting patrons were counted manually during the same time periods. Daily and hourly activity information were obtained from this data. Table 1 below summarizes the total daily patron counts over the course of a week.

Table 1
Comparison of Daily LHWC Activity

Date	Day of Week	Total Number of LHWC Users
September 16, 2002	Monday	2,343
September 17, 2002	Tuesday	2,423
September 18, 2002	Wednesday	2,505
September 19, 2002	Thursday	2,227
September 20, 2002	Friday	1,636
September 21, 2002	Saturday	1,108
September 22, 2002	Sunday	655
Typical Weekday (Mon - Thurs)		2,375

Hours of Operation: Monday through Saturday, 7am to 10pm; Sunday 11am to 8pm

As Table 1 indicates, the peak day of activity occurred on Wednesday with 2,505 total patrons. Sunday had the lowest level of activity with 655 patrons. The average number of weekday (Monday through Thursday) patrons is 2,375.

During the data collection period approximately 17,000[2] students, 2,000 faculty, and 7,800 staff were enrolled or employed at the Foggy Bottom Campus. All 17,000 students have membership rights. Approximately 1,000 of the 9,800 faculty and staff have paid memberships. Dividing the 2,375 average weekday patrons into the total 18,000 people who have current memberships indicates that only 13% of the current members use the facility on an average weekday.

[1] University identification cards issued to students, faculty and staff. They contain a small amount of electronic information and are used to gain access to the LHWC.
[2] Enrollment numbers include full time, part time, undergraduate and graduate students

The number of people occupying the LHWC at one time was determined by comparing the entering and exiting data. Figures 1A and 1B show the daily activity profile of the LHWC for a typical weekday based on hourly counts of patrons entering and exiting the facility (average of Monday through Thursday). Figure 1A includes the 1,973 facility capacity limit for the LHWC based on the existing fire code. Figure 1B shows a detailed view of the profile. The Appendix contains a daily activity profile of a Saturday.

The data collected shows that the LHWC experienced the most traffic entering and exiting the facility between 6pm and 7pm with 507 patrons[1]. The peak accumulation occurred at 6pm, with 243 patrons in the LHWC. As Figure 1A illustrates, the 243 maximum number of patrons in the LHWC at one time is significantly below the facility's capacity (243 is 12% of the 1,973 facility capacity limit).

[1] Total of entering and exiting traffic

Figure 1A
Daily Profile of LHWC Activity: Typical Weekday (with Facility Capacity)

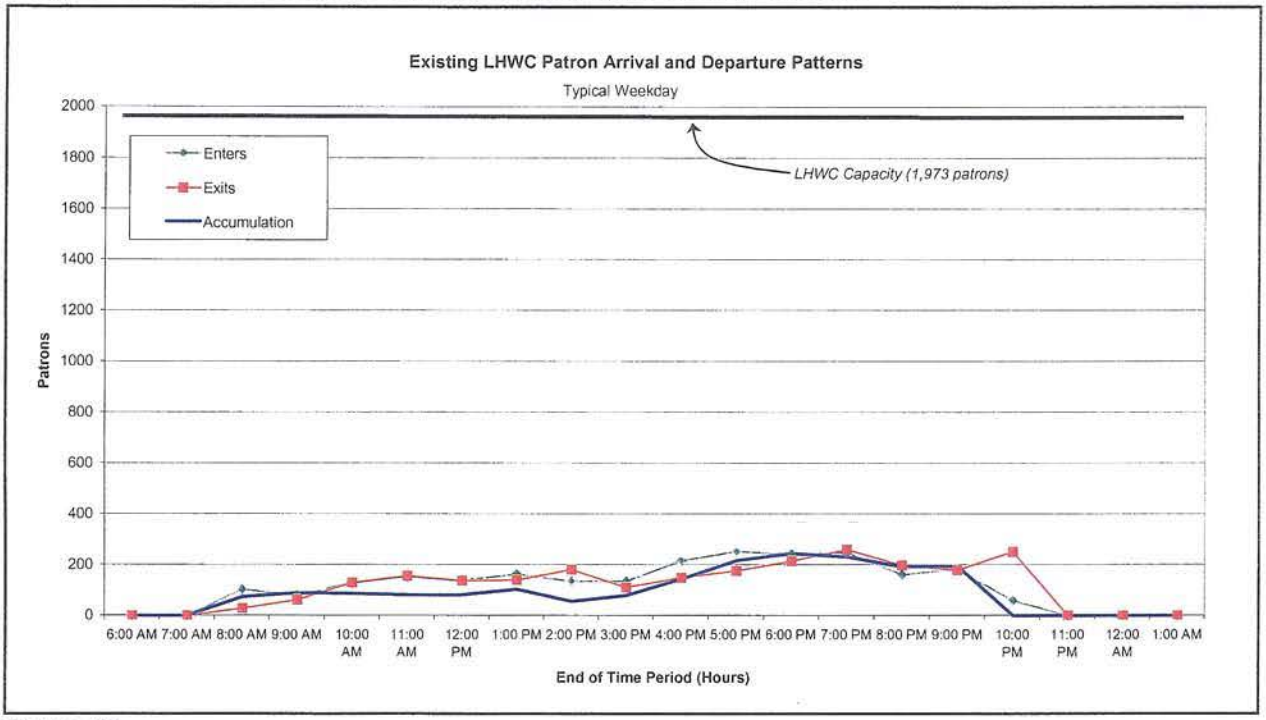
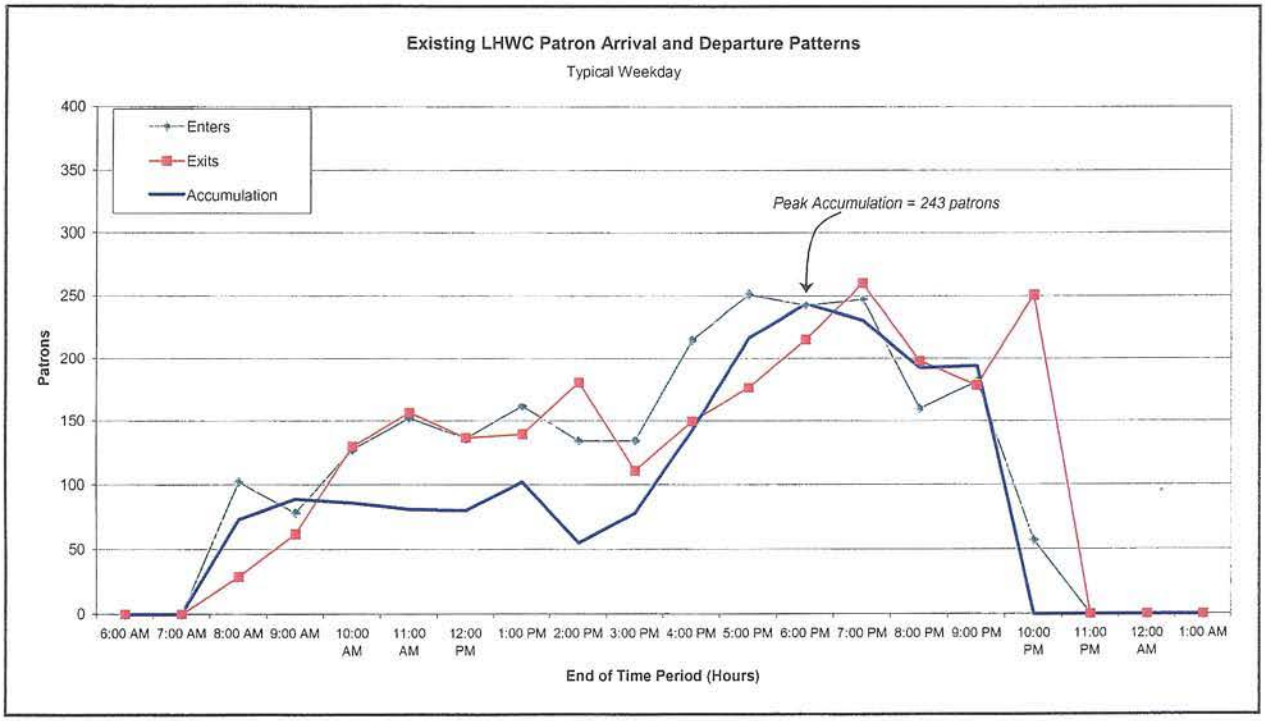


Figure 1B
Daily Profile of LHWC Activity: Typical Weekday, Details of Activity Profile



As part of the 1997 and 1998 Health and Wellness Center BZA hearings, GW estimated the daily activity profile of the LHWC. Figure 2 presents a comparison of the actual daily activity profile (Figure 1) versus the 1997 projection for the LHWC.

Figure 2
Accumulation Comparison: 1997 Projected Volumes vs. Existing Counts

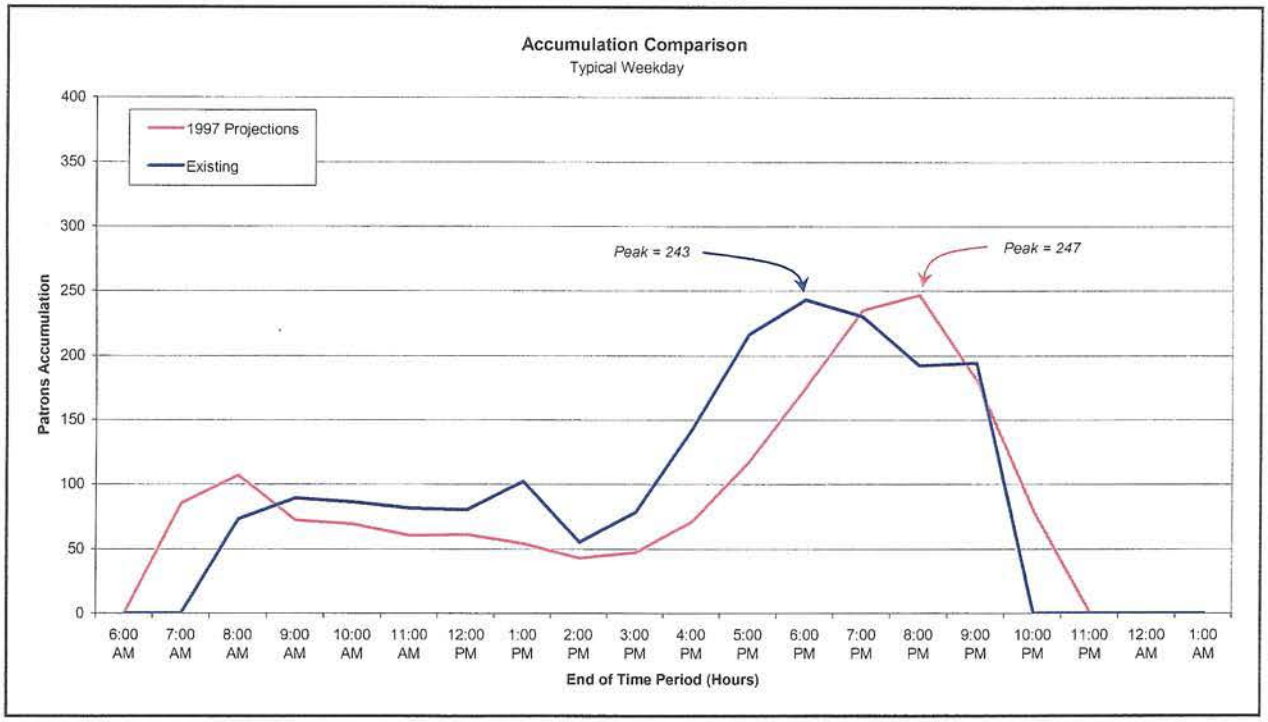


Figure 2 shows that the 1997 projected LHWC activity displays similar trends to the count data collected for the facility. Patron peak activity occurs earlier than predicted in 1997, but the total accumulation of users in the facility (243) is very close to the original figure given in the 1997 study (247).

Counts at the President's Club at the Smith Center conducted Thursday, September 19 and Saturday, September 21 showed that typical total patronage is 32 on a weekday and 8 on a Saturday, of 86 total members. Existing patron activity data for alumni usage of the Smith Center was collected on October 4 through 6, 2002. During this weekend, 29 alumni used the Smith Center (7 on Friday evening, 8 on Saturday evening, and 14 on Sunday evening). Daily activity profiles of a weekday and Saturday for the President's Club at the Smith Center are contained in the appendix. This data shows that the Smith Center attracts a minimal amount of alumni and non-affiliated GW patrons, in comparison to overall use of the LHWC.

Mode Choice Survey

In order to examine the travel patterns of LHWC and Smith Center users, a mode choice survey was conducted at both locations. Over peak periods of uses on several days between September 19 and 24, 2002[1], questions were asked to both patrons of the LHWC and the Smith Center President's Club members. The purpose of the surveys was to estimate the number of LHWC users and President's Club members who drive, and if so, where they park. The mode choice results of the survey are summarized in Table 2, and graphically in Figure 2. Copies of the survey forms, and additional survey summary tables are contained in the Appendix.

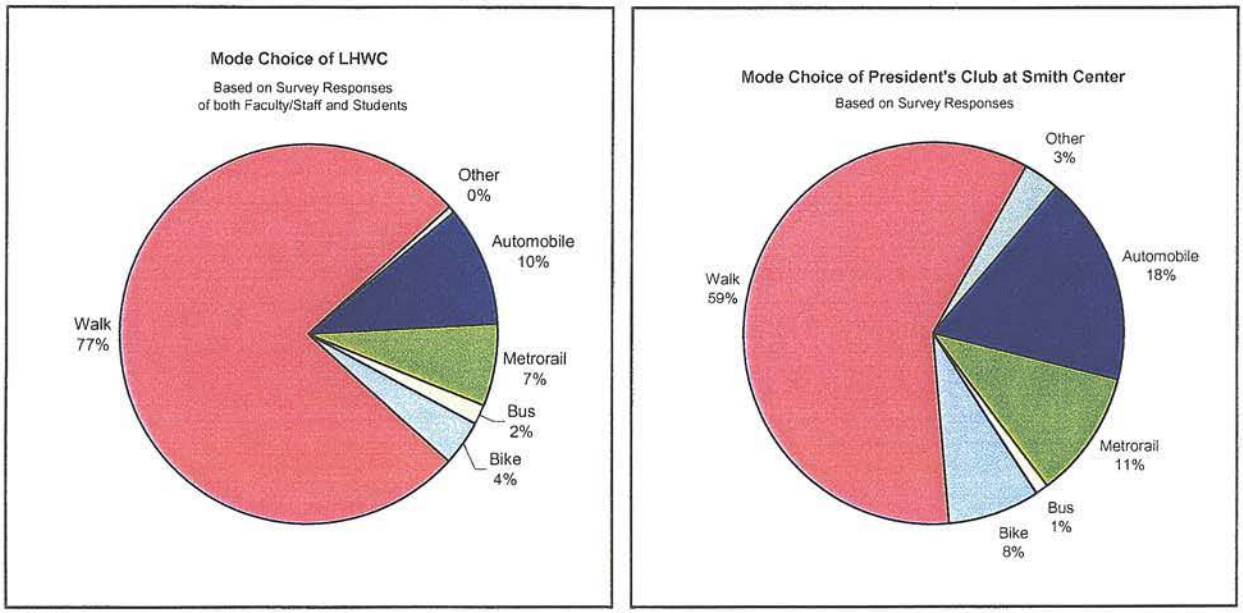
Table 2
Survey Results, Mode Choice

Facility and Type of User	Mode						
	Automobile	Metrorail	Bus	Bike	Walk	Other	Total
Lerner Health and Wellness Center							
Student	9% (17)	4% (7)	0% (0)	2% (3)	86% (172)	1% (1)	100% (200)
Faculty/Staff	21% (7)	26% (9)	12% (4)	18% (6)	24% (8)	0% (0)	100% (34)
Total LHWC	*10% (24)*	*7% (16)*	*2% (4)*	*4% (9)*	*77% (180)*	*0% (1)*	*100% (234)*
President's Club at Smith Center							
Alumni	20% (8)	10% (4)	2% (1)	7% (3)	61% (25)	0% (0)	100% (41)
Faculty/Staff	33% (1)	33% (1)	0% (0)	0% (0)	33% (1)	0% (0)	100% (3)
Non-GW Affiliated	14% (5)	11% (4)	0% (0)	9% (3)	60% (21)	6% (2)	100% (35)
Total PC at S. Center	*18% (14)*	*11% (9)*	*1% (1)*	*8% (6)*	*59% (47)*	*3% (2)*	*100% (79)*

9% (17) - Percentage (Number of Responses)

[1] Surveys were conducted on Thursday (19th), Friday (20th), Monday (23rd) and Tuesday (24th) during the morning 7:30 to 9:30am, lunch-time 11am to 1pm, early evening 4 to 6:30 pm, and night 8 to 10pm; Saturday (21st), during the afternoon and early evening. No surveys were conducted on Sunday (22nd).

Figure 2
Mode Choice of Fitness Facility Users



Another question on the survey helped determine the automobile generation of the two facilities, '*Was visiting the Health and Wellness Center (or President's Club at Smith Center) your primary reason for coming to GWU today?*'. The 'yes' response to this question totaled 17% of the LHWC and 95% of the President's Club at the Smith Center responses. Cross-referencing this question with the mode choice question found that 5% of LHWC patrons drive to campus primarily to use the LHWC, and 15% of President's Club patrons drive to campus primarily to use the President's Club. Half of LHWC drivers and 17% of Smith Center drivers are not considered in any traffic analysis since they would have driven to the GW campus even if the Health & Wellness Center were not open.

FUTURE CONDITIONS

This section of the report describes the expected increase in patron activity, and traffic and parking demand at the LHWC after the proposed zoning changes.

Projected Daily Activity

The projected activity at the LHWC is comprised of three elements: (1) the existing LHWC patrons, (2) an increase in activity due to the extension of operating hours and (3) the addition of new classes of members to the facility.

Extending the hours of operations would not significantly increase activity at the LHWC. The University projects that most of the demand for late night use of the LHWC consists of

intramural student games and competitions. Activity for the extended hours was estimated based on activity at the beginning and end of current operations and the expected intramural use of the facility.

After the changes in zoning the maximum number of additional memberships that would be sold is 3,000. Most likely, the amount of memberships sold would be less than this amount, but for purposes of this evaluation, a figure of 3,000 provides a conservatively high estimate of additional LHWC users.

The next step in calculating the projected increase in activity was to determine the percentage of these new members that would visit the LHWC on a given day. National trends for similar facilities show that an average of 25% of membership will patronize a fitness facility per day. The new members to the LHWC will most likely exhibit the same tendencies, although this percentage will fluctuate over the course of the week, with more members attending on weekdays rather than weekends. The data collected for the President's Club at the Smith Center (37% of members use the facility on a typical weekday), combined with data for similar facilities at other Universities was used to develop the assumption that 32% of new members would utilize the LHWC on a typical weekday, and 13% on a Saturday. Applying the 32% usage rate to 3,000 additional members results in 960 additional members per day.

Once it was established how many new members would use the LHWC per day (960), it was necessary to determine what times of the day they would visit. Four factors were used to develop an hourly daily activity profile for new members: (1) the current daily activity profile of the LHWC, (2) the current daily activity profile of the President's Club at the Smith Center, (3) data from similar facilities, and (4) the assumption that new members would not take advantage of the extension of closing hours past 10pm.

The projected increase in activity due to the new members and from the expansion of operating hours was added to the existing daily activity profile. Figure 3 shows the projected daily activity profile. A similar projected profile for Saturday traffic is contained in the Appendix. Figure 4 displays the projected accumulation of patrons in the LHWC by type of user.

Figure 3
Projected Daily Profile of LHWC Activity, After Zoning Changes

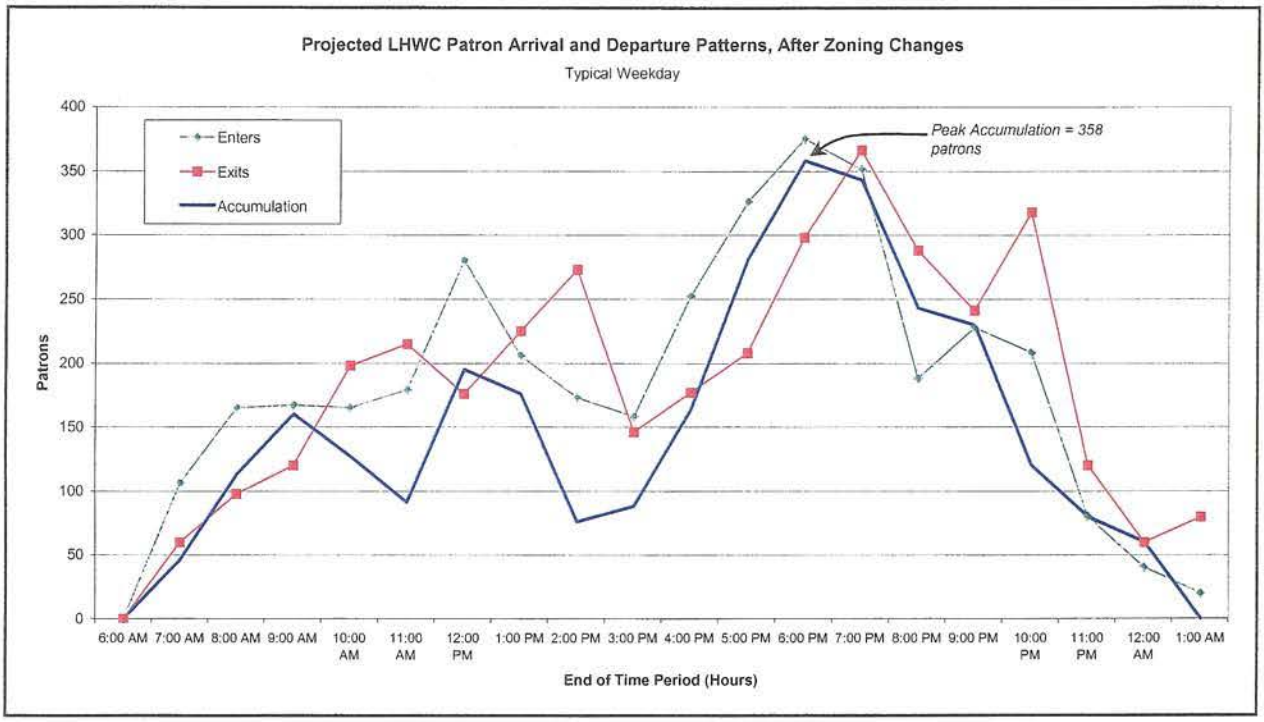
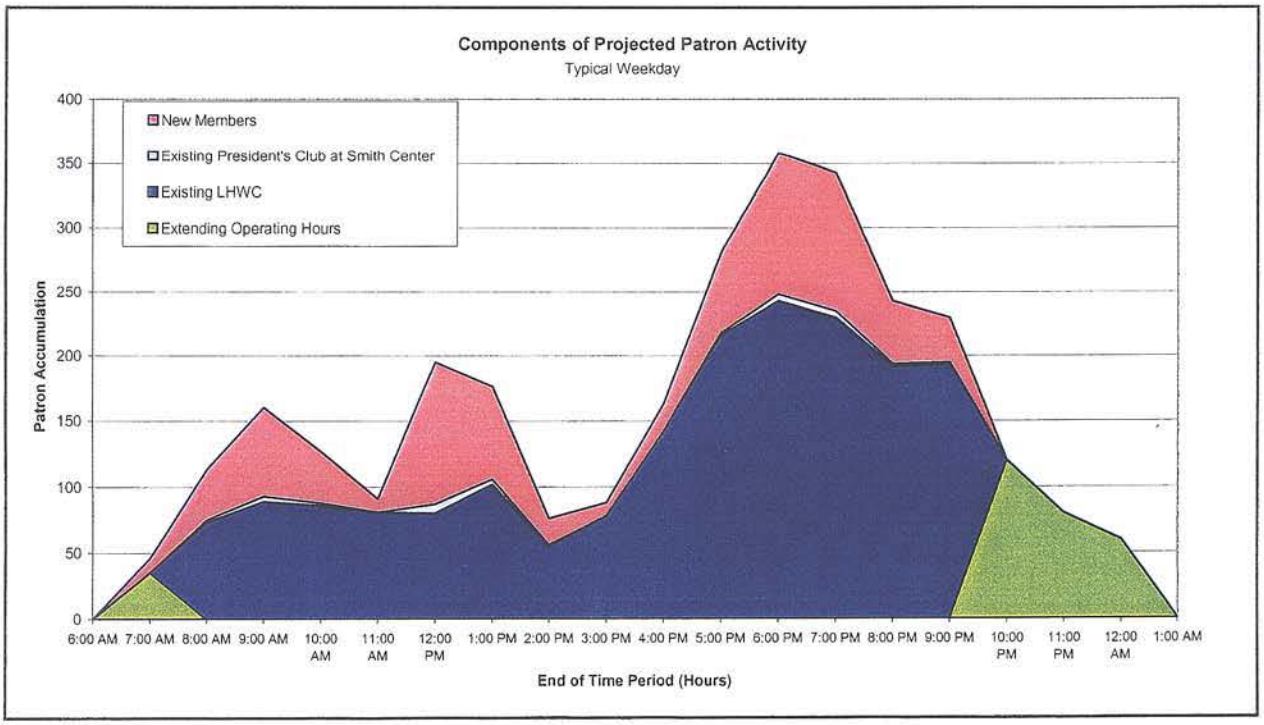


Figure 4
Components of Projected LHWC Patron Activity



The activity projections show that after the zoning changes, the LHWC will experience peak traffic between 6pm and 7pm with 717 patrons. The peak accumulation will still occur at 6pm, with 358 patrons, or 18% of facility capacity.

Projected Traffic and Parking Demand

The traffic and parking demand generated by the proposed changes to the operation of the LHWC were determined by applying the results of the mode choice survey to the projected patron activity. These calculations assume that new members of the LHWC would exhibit some of the same travel characteristics as both the existing members of the LHWC and the President's Club at the Smith Center. Community members would behave similar to students and faculty/staff currently using the LHWC, with the exception that 100% of these members would live near the LHWC, decreasing the likelihood they will drive. Similarly, alumni users would use the LHWC in a similar pattern to current President's Club patrons. Based on these assumptions, the percentage of new members that would drive was determined to be 15%. This figure is closer to the mode split of President's Club members because GW estimates that of the new members, approximately one third will be community members and the remaining two-thirds will not be Foggy Bottom residents.

Projected traffic and parking demand was generated by applying this mode choice percentage to projected patron activity. Figure 5 displays the existing and projected traffic and on-street parking demand for a weekday. A similar chart for Saturday traffic is presented in the Appendix.

Figure 5
Existing and Projected Traffic and Parking Demand: Typical Weekday

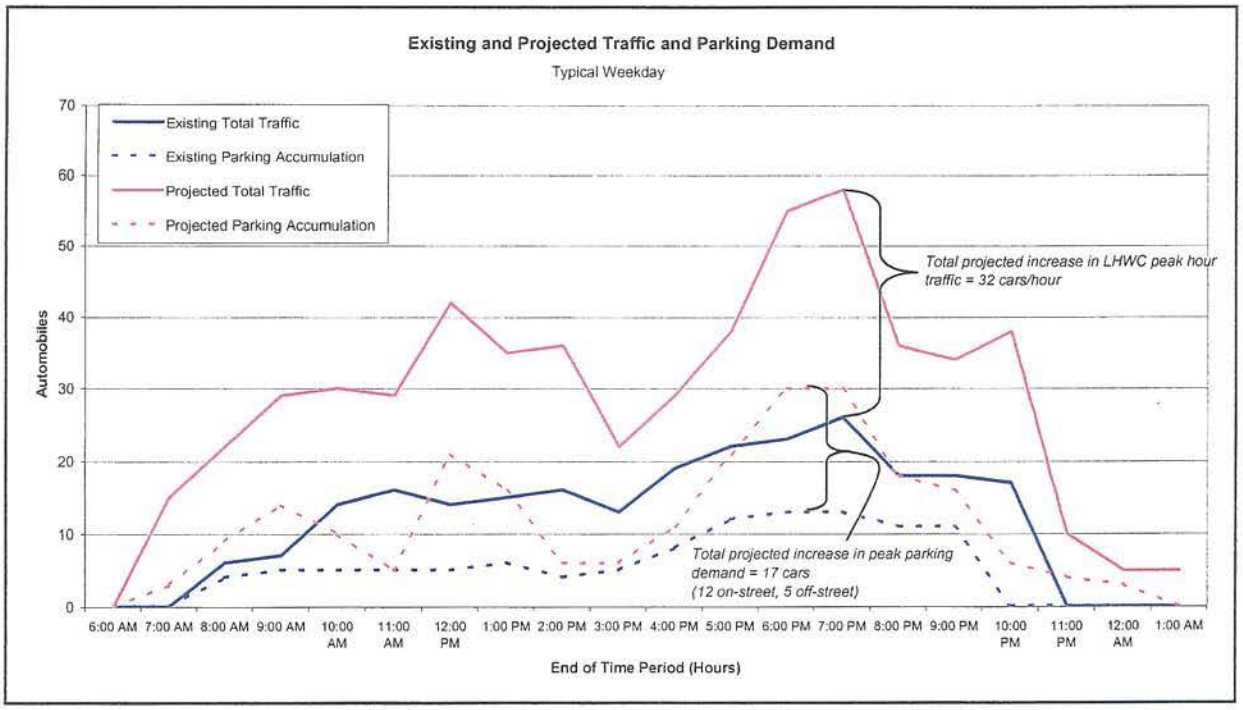


Figure 5 shows that the weekday peak hour of LHWC generated traffic (6pm to 7pm) will increase by 32 vehicles. The peak amount of on-street parked vehicles will increase by 17.

Impacts of Additional Traffic and Parking Demand

The 1997 Traffic Impact Study performed for the LHWC showed that the evening PM peak hour of street traffic around the LHWC was 5:30 to 6:30pm. During this time approximately 8,500 peak hour vehicles occupy the roadways on the GW campus. An additional 32 peak hour vehicles generated by the LHWC dispersed throughout the roadway network represents about a 0.4% increase in traffic. This change in traffic is significantly less than the daily variance in traffic conditions and any impacts are immeasurable.

One of the questions included in the mode choice survey asked about the parking locations, both off-street and on-street for patrons of the LHWC and the President's Club at the Smith Center. A summary of the answers received is contained in Table 3.

Table 3
Survey Results, Parking Location

Parking Location	Type	Number (Percent) of Parkers			
		Student	*Faculty/Staff*	*President's Club at Smith Center*	*Total*
Behind Funger	Off-Street	0 (0%)	1 (20%)	0 (0%)	1 (3%)
H Street	Off-Street	0 (0%)	1 (20%)	0 (0%)	1 (3%)
Ken Cntr	Off-Street	0 (0%)	1 (20%)	0 (0%)	1 (3%)
Mar Cntr	Off-Street	3 (20%)	0 (0%)	0 (0%)	3 (10%)
21st Street	On-Street	1 (7%)	0 (0%)	0 (0%)	1 (3%)
22nd Street	On-Street	2 (13%)	0 (0%)	7 (70%)	9 (30%)
23rd Street	On-Street	2 (13%)	0 (0%)	0 (0%)	2 (7%)
F Street	On-Street	1 (7%)	1 (20%)	1 (10%)	3 (10%)
G Street	On-Street	3 (20%)	0 (0%)	1 (10%)	4 (13%)
H Street	On-Street	2 (13%)	0 (0%)	1 (10%)	3 (10%)
I Street	On-Street	1 (7%)	1 (20%)	0 (10%)	2 (7%)

The survey responses show that patrons of the LHWC park in several different on-street and off-street parking locations, dispersed throughout the campus. The new members of the LHWC are also expected to use similar off-street and on-street parking locations.

Based upon an on-street parking inventory for the Foggy Bottom campus (conducted during the 2000 Campus Plan Study), there are approximately 450[1] on-street parking spots within a two to

[1] Parking inventory does not include residential parking spots west of 24th Street or South of F Street

three block walk from the LHWC. The peak on street parking demand increase is projected to be 12 parked vehicles, which represents 3% of this nearby parking supply.

Also proposed in the zoning changes is a provision to allow the LHWC to host intercollegiate men's and women's squash. A squash tournament will attract 30 to 40 team members and coaches. GW student athletes and coaches would likely arrive to the LHWC similar to current LHWC patterns. Visiting University athletes and coaches would arrive by team van that would park in a GW parking facility. The use of the LHWC for intercollegiate men's and women's squash would have a minimal impact on traffic and parking.

Impacts of Additional Pedestrian Traffic

Gorove/Slade conducted pedestrian counts during the evening of Thursday, October 3rd on G Street between 23rd and 24th Streets, outside of the LHWC. These counts, which coincided with the peak period of facility use, show a peak hour of pedestrian activity of 317 pedestrians/hour in both directions. The width of the sidewalk on G Street is six feet. The increase in traffic due to the zoning changes would be 210 patrons/hour entering and exiting the facility, for a projected total of 517 pedestrians per hour on G Street. This level of projected activity, under the existing pedestrian infrastructure, equates to a Level of Service 'B'. Thus, the existing pedestrian facilities at the LHWC can accommodate this increase in activity.

CONCLUSIONS

The following is a summary of the primary conclusions presented throughout this study:

- Existing LHWC currently operates well under capacity (243 patrons during the peak time represents 12% of the 1,973 building capacity)
- Only 5% of LHWC patrons drive primarily to go to LHWC.
- Even with projected patronage, LHWC will still operate well under capacity (18% of 1,973 capacity).
- LHWC zoning changes will result in a 32 cars/hour increase in peak hour traffic. This represents 0.4% of the 8,500 peak hour traffic using roadways on the GW campus.
- The 0.4% projected increase in traffic would have an immeasurable impact on traffic conditions.
- LHWC will generate a demand for 12 additional on-street spaces. These 12 spaces represent 3% of the approximately 450 street spaces within a three block walk of the LHWC.
- The existing six foot sidewalks can accommodate increase in pedestrian usage.