

**BEFORE THE DISTRICT OF COLUMBIA
ZONING COMMISSION**

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**Application of Gallaudet University
Amendment to Approved Campus Plan and
Further Processing Under Amended Campus Plan
800 Florida Avenue, NE**

PRELIMINARY STATEMENT OF COMPLIANCE WITH BURDEN OF PROOF

I. Background:

The Subject Property (Parcel 141/69) is used as the campus for Gallaudet University and is also home to the Laurent Clerc National Deaf Education Center. The original Campus Plan for Gallaudet University was approved by the Board of Zoning Adjustment in 1972 (BZA Order No. 11093). The 2002-2012 Campus Plan was approved by the Zoning Commission in 2003 (Zoning Commission Order No. 03-02). The Zoning Commission most recently approved an application for further processing under the 2002-2012 Campus Plan in 2006, for the construction of the Sorenson Language and Communication Center (ZC Case No. 06-16).

Gallaudet University has been located at the Subject Property since its founding more than 150 years ago, and has played an integral role in the development of its immediate neighborhood and the District as a whole. Gallaudet University has proceeded with development of its capital projects over the last 35 years in strict accordance with the campus planning process set forth in the Zoning Regulations. Subsequent to the initial approval of its campus plan in 1972, Gallaudet has returned to the Board of Zoning Adjustment on numerous and regular occasions for approval of revised campus plan documents and further processing under those documents. Throughout the campus plan review and further processings, Gallaudet has consistently engaged its neighbors in the process, through meetings with affected Advisory Neighborhood Commission(s) and with the Gallaudet Community Relations Council.

II. Proposed Development:

Denison House is one of three historic buildings along what is known as "Faculty Row" that was originally built circa 1875 as a faculty residence. The Applicant proposes to convert the use of Denison House from administrative back to residential use. Denison House is proposed to serve as a "College House" student residence hall, where a select group of honors students can advance their studies through a themed living and learning program. Teams of students with a faculty advisor will compete on an annual basis for the opportunity to live in Denison

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House for one year. The selected residents' year-long experience will be centered around a cross-disciplinary academic or community service program.

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Denison House will contain space for approximately ten to twelve student beds and an apartment for a faculty member. It also will include dining, study and recreational facilities for the resident students. The conversion will entail primarily interior renovation, with some minor repair work to the building's exterior. No expansion of the existing building is proposed.

At the time of processing the 2002-2012 Campus Plan, the Applicant contemplated that Denison House, one of a few buildings on the campus included in the Gallaudet College Historic District, would continue to serve as an administrative building. Since that time, the Applicant has adopted a new strategic plan, which places a renewed emphasis on the quality of students' living and learning experience. The College House tradition, where a faculty member and a select group of students reside in a themed living and learning environment, has proved a successful model for providing students a rich academic experience and valuable life skills. Denison House is one of a number of historic residential buildings along Faculty Row that were constructed in the late 1800s to provide housing for faculty and students. The proposed change of use reverts back to the original intended use of the building as it provides a collegial setting steeped in the architectural heritage of the original Gallaudet campus.

Currently, the offices of the Gallaudet Press are located in Denison House. Those offices are planned to be relocated to the fourth floor of College Hall, the main administrative building on campus. This new location will enhance operational efficiencies for Gallaudet Press as it provides closer adjacencies to other related administrative units.

The Applicant therefore requests a minor amendment to the 2002-2012 Campus Plan to reflect that Denison House is to be utilized for residential use rather than administrative or academic use. As part of the Applicant's prehearing submission not less than 14 days prior to the public hearing, the Applicant will identify the detailed revisions needed to the approved 2002-2012 Campus Plan document to effectuate this minor change.

III. Burden of Proof:

Pursuant to §210.1 of the Zoning Regulations, use as a college or university that is an academic institution of higher learning shall be permitted in all residential zones if approved by the Zoning Commission under §3104 of the Regulations, subject to the provisions of §210. The portion of the campus on which

the proposed building will be located is in the R-4 District. The Applicant meets the burden of proof as follows:

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- A. Section 210.2.** *The university use shall be located so as not likely to become objectionable to neighboring property because of noise, traffic, number of students, or other objectionable conditions.*

The proposed conversion of Denison House to residential use will not be objectionable to neighboring property because of noise, traffic, number of students, or other objectionable conditions. Only ten to twelve student beds and one faculty apartment are contemplated be located at Denison House, which is an existing building that is located in the interior of the campus, and is not readily visible outside of the campus boundary. This use will replace the Gallaudet Press, which is being relocated to space on the fourth floor of College Hall. This will result in no adverse external effects in the community.

Furthermore, the Applicant intends to continue to uphold its obligations as a good neighbor within its community. To that end, it commits to remaining an active participant in the community, maintaining its open relations with nearby residents and businesses, especially through the Gallaudet Community Relations Council.

- B. Section 210.3.** *The maximum bulk requirements of individual buildings may be increased beyond what would otherwise be permissible, provided that the total bulk of all buildings and structures shall not exceed the gross floor area prescribed for the R-5-B District, namely 1.8 FAR.*

The bulk proposed by Gallaudet for the university portion of its 2002-2012 Master Plan is approximately 0.46 FAR, well under the allotted 1.8 FAR. No increase in density is contemplated as part of the conversion of the existing building from administrative to residential use.

- C. Section 210.4.** *The applicant must submit to the Commission a campus planning document, showing the location, height, and bulk, where appropriate, of all existing and proposed improvements, including: (a) buildings and parking and loading facilities; (b) screening, signs, streets and public utility facilities; (c) athletic and recreational facilities; and (d) a description of activities conducted on the campus and capacity of all present and proposed campus development.*

Gallaudet's approved 2002-2012 Campus Plan (Exhibit 11 in ZC Case No. 03-02) addresses all of these issues, and is still in effect. The Applicant will provide as

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part of its prehearing statement appropriate detailed documentation to accomplish the requested minor modification to the 2002-2012 Campus Plan to reflect the change to residential use of Denison House. This documentation will include replacement drawings and figures to the approved 2002-2012 Campus Plan document.

- D. Section 210.5.** *Within a reasonable distance of the college or university campus, and subject to compliance with the provisions of §210.2, the Commission may also permit the interim use of land or improved property with any use that the Commission may determine is a proper college or university function.*

As part of this application, the Applicant is not proposing any interim use of land or improved property outside the university campus.

- E. Section 210.6.** *When a major new building that has been proposed in a campus plan is instead moved off-campus, the previously designated site shall not be designated for or devoted to a different major new building until and unless the Zoning Commission has approved an amendment to the campus plan applicable to the site; provided, that for this purpose a major new building is defined as one specifically identified in the campus plan.*

As part of this application, the Applicant is not proposing to move any major new or previously-approved building off-campus.

- F. Section 210.7.** *In reviewing and deciding a campus plan application or new building construction pursuant to a campus plan, the Commission shall consider, to the extent they are relevant, the policies of the District Elements of the Comprehensive Plan.*

This application is for neither a new campus plan nor new building construction. However, to the extent relevant, this application will have no adverse impact on the District Elements of the Comprehensive Plan. The Subject Property is designated as an institutional use on the Future Land Use Map of the Comprehensive Plan. The objectives for public and institutional land uses set forth in the Comprehensive Plan include promoting the continued contributions made by private institutions toward the economic and cultural vitality of the District. The campus and university relations are also discussed in the Educational Facilities

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Element, including reference to preservation of historic campus buildings and on-site housing of students. The proposed conversion furthers these objectives, as does the Applicant's active involvement with the Gallaudet Community Relations Council.

The Comprehensive Plan's Historic Preservation Element and Upper Northeast Element emphasize the importance of protecting important historic features while permitting sensitive and compatible new development. The campus, which includes Gallaudet College Historic District, listed on the National Register of Historic Places and D.C. Inventory of Historic Sites, is included on the list of important historic sites within the Upper Northeast Area. As part of the conversion of Denison House to residential use, the Applicant will undertake minor necessary repairs to the exterior of the building. The Applicant will review these issues with the Historic Preservation Office prior to the public hearing of this application.

- G. Section 210.8.** *As an integral part of the application requesting approval of new building construction pursuant to a campus plan, the university shall certify and document that the proposed building or amendment is within the floor area ratio limit for the campus as a whole, based upon the computation included in the most recently approved campus plan and the FARs of any other buildings constructed or demolished since the campus plan was adopted.*

This Application does not include request for approval of new building construction, only conversion of uses for an existing building. There is no proposed change to the approved campus FAR in this application.

- H. Section 210.9.** *Before taking final action on applications for use as a college or university, the Commission shall submit the application to the D.C. Office of Planning and the D.C. Department of Transportation for review and written reports.*

It is our understanding that the Office of Zoning will refer this application to the Office of Planning and the D.C. Department of Transportation.

- I. Section 3104.1.** *The Commission is authorized to grant the campus plan special exception, where, in the judgment of the Commission, it 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 Regulations and Maps.*

Based on the foregoing, the Applicant believes that the proposed conversion of Denison House from administrative use back to residential will be in harmony with the general purpose and intent of the Zoning Regulations and will not tend to adversely affect the use of neighboring property in accordance with the Regulations and Maps.

For all these reasons, Gallaudet University satisfies the requirements for special exception approval to amend the approved 2002-2012 Campus Plan and further processing under the amended Campus Plan to convert Denison House to residential use.

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