THE GEORGE WASHINGTON UNIVERSITY
Square 103 Residence Hall



APPLICATION TO THE DISTRICT OF COLUMBIA ZONING COMMISSION FOR CONSOLIDATED REVIEW AND APPROVAL OF A PLANNED UNIT DEVELOPMENT AND ZONING MAP AMENDMENT

July 30, 2003

ZONING COMMISSION
District of Columbia
Case 03-29
Exhibit 2

ZONING COMMISSION
District of Columbia
CASE NO.03-29
EXHIBIT NO.2

DEVELOPMENT TEAM

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PREFACE

The George Washington University ("**Applicant,**" "**GW**" or "**the University**") is engaged in a major and immediate effort to increase significantly the number of on-campus beds. The University has filed this application for the consolidated review and one-step approval of a Planned Unit Development ("**PUD**") and corresponding amendment to the Zoning Map as an essential part of that effort. In approving GW's 2000 Campus Plan (the "**Plan**"), the Board of Zoning Adjustment ("**BZA**") required the University to provide on-campus housing for 70% of its undergraduate students by August of 2006 and to house freshmen and sophomores on-campus. Although the University has challenged certain aspects of the order approving the Campus Plan, the University remains committed to one of its most pressing priorities – the creation of a critical mass of new on-campus beds.

In pursuing its housing goal, the University has recognized the urgency identified by the BZA and has moved expeditiously to add beds. Since the approval of the Plan, the University has secured approval for a total of 932 new beds in two major on-campus housing projects (Squares 43 and 57). Construction of the 728-bed Square 43 project is underway with an anticipated completion date of August 2004, and the 204-bed Square 57 project was completed recently. The Plan specifically identified Square 103 as a housing site. If the Commission approves the requested PUD and rezoning, the University will be able to add 250 more beds than were anticipated in the Plan.

During the recent campus planning process, the University engaged in extensive discussions with the District of Columbia Office of Planning and members of the Foggy Bottom community. Throughout the process, the need for more on-campus housing for GW students was the paramount issue. This application demonstrates the University's commitment to responding to this issue.

The Applicant owns the proposed project site, which is located at 2025 F Street, N.W. in Square 103, Lot 817 ("**Subject Property**"). The Subject Property comprises over one-half of an acre (28,669 square feet) of land area and is located in the R-5-D Zone District. In this application, the University proposes to construct a 530-bed residence hall (the **"Proposed Project"**) on a surface parking lot. This site also contains the two-story Support Building and a service yard, both of which will remain. The area is characterized by high-density commercial and residential uses, as well as institutional uses. The map amendment requests that the Subject Property be rezoned to the C-3-C Zone District in order to maximize the number of beds by providing flexibility in the building design and additional height. This will permit the University to provide almost double the number of beds than is possible at this site under the existing zoning.

This statement demonstrates that the Proposed Project meets all of the requirements of Chapter 24 of the District of Columbia Zoning Regulations. The new residence hall will offer important public benefits to the Foggy Bottom neighborhood and the District as a whole. It will provide:

- an additional 530 new beds within the Campus Plan boundaries, a 90% increase over the number of beds GW could provide under the current R-5-D zoning and development standards;

- approximately 1000 square feet of public retail space on the ground floor; and

- superior design and attractive landscaping.

These public amenities and benefits will carry out the purposes of Chapter 24 of the Zoning Regulations by encouraging the construction of well-planned residential developments and offering a building type with a more attractive and efficient overall planning and design not achievable under matter-of-right development.

In addition, the Proposed Project is consistent with the Comprehensive Plan in numerous respects. It will:

- help stabilize the Foggy Bottom neighborhood by providing more on-campus housing for GW students;

- improve the physical character of the District by replacing a surface parking lot with an attractive, new residential building;

- promote land use patterns and transportation services which decrease reliance on automobiles for commuting and other routine trips;

- enhance the streetscape by reducing conflicts between pedestrian and vehicular traffic in order to increase pedestrian safety and comfort;

- realize several objectives set forth in the Ward 2 Plan in a manner that is entirely consistent with the Generalized Land Use Map.

For the above reasons, the approval of this application will promote orderly development in conformity with the entirety of the District of Columbia zone plan as embodied in the Zoning Regulations and Map of the District of Columbia.

In support of this application, the Applicant hereby submits completed application forms, a notice of intent to file a PUD (with property owner list and certificate of mailing), architectural drawings, and a Zoning Map of the subject property and surrounding area. As set forth below, this statement and the attached documents meet the filing requirements for a PUD application under Chapter 24 of the District of Columbia Zoning Regulations.

I. INTRODUCTION

A. Summary of Requested Action

This document supports the application of The George Washington University to the Zoning Commission of the District of Columbia ("**Commission**") for the consolidated review and one-step approval of a PUD and a corresponding amendment to the Zoning Map for the Subject Property. The project site is located in the southeastern portion of the GW campus in the Foggy Bottom neighborhood of Ward 2. It comprises approximately 28,669 square feet of land area and is located in the institutional land use category as depicted on the District of Columbia Generalized Land Use Map. The areas immediately to the north and to the east of the Campus Plan boundaries are designated for high-density commercial use, and the area immediately to the south is designated for high-density residential use.

The Applicant requests a Zoning Map amendment to change the current R-5-D zoning to C-3-C. The proposed zoning will allow the University to maximize on-campus housing for its undergraduate students on this site by providing flexibility in the building envelope in terms of building height and setbacks. The rezoning is not needed to achieve additional density. The proposed floor area ratio ("**FAR**") of 5.2 could be constructed on the site without zoning relief and is far less than the maximum 8.0 FAR that is permitted for a PUD in the C-3-C Zone. The rezoning is needed to achieve the proposed 120 foot height that is essential to the project. Because the existing Support Building on the site will be retained at its current height of 46 feet, the proposed critical mass of beds can be

achieved only with additional height on the remaining portion of the site. Further, the PUD process will allow relief from the court and rear yard requirements resulting in a more efficient footprint. Rezoning the site to the C-3-C District in connection with a PUD is consistent with the purposes of the PUD process, the goals and policies of the Comprehensive Plan of the District of Columbia and The George Washington University Campus Plan.

B. The Applicant

The George Washington University was established by Congressional charter in 1821. Since that time, it has developed into one of the nation's foremost universities, offering both undergraduate and graduate programs in a variety of disciplines.

GW's campus has been located in Foggy Bottom since 1912. The campus is bounded by 19th Street to the east, 24th Street to the west, Pennsylvania Avenue to the north and E Street to the south. As of the Fall of 2002, GW enrolled approximately 8066 undergraduate students, 4526 of whom had on-campus housing.

As stated during the 2000 Campus Plan process, the University is committed to housing more of its students on campus. During that process, members of Advisory Neighborhood Commission 2A ("**ANC 2A**"), the Foggy Bottom Citizens' Association, several tenants' associations, and the District of Columbia Office of Planning, urged the BZA to require GW to provide more student housing within the Campus Plan boundaries. This application directly addresses the University's commitment to increasing on-campus

housing on an expedited basis and thereby addressing the issue that dominated the campus planning process.

C. Project Goals and Objectives and Benefits of Using the PUD Process

The PUD process allows "flexibility of development" as a means for creating "high quality developments that provide public benefits." 11 DCMR §§ 2400.1, 2400.2. The objectives of the PUD process are to provide incentives for a project that "offers a commendable number or quality of public benefits" and that "protects and advances the public health, safety, welfare, and convenience." 11 DCMR § 2400.2. The notice and hearing requirements of the PUD regulations ensure that adjacent property owners and area residents will have the opportunity to express their views about the application. The PUD process will provide the Zoning Commission with an opportunity to review the design of the project in connection with its consideration of the request to rezone the site to C-3-C.

The Applicant's objective is to maximize on-campus student housing in accordance with GW's Campus Plan and the District of Columbia Comprehensive Plan. Through the PUD process, the University will be able to provide almost double the number of beds that it would be able to provide under matter-of-right guidelines. By choosing to construct dormitory-style units instead of apartment-style units, the University will be able to house the greatest number of students possible.

The requested zoning from R-5-D to C-3-C in order to maximize housing is appropriate. In the past the Zoning Commission has approved rezonings to commercial or mixed use zones to facilitate the production of housing. For example, in Zoning Commission Order No. 483, the Commission rezoned a property from R-5-D to C-3-C to enable the applicant to construct the Mayfair House, an apartment building containing first floor commercial uses, and ten floors of residential units. The proposed PUD site is located in Square 73 along L Street between 21st and 22nd Streets, NW. Similarly, the PUD involving the site at 2301 N Street, NW (Z.C. Order No. 573) involved a rezoning from R-5-8 to CR to maximize housing.

D. Development Timetable

The Applicant plans to start construction by the fall of 2004 and expects that the total construction will be completed by late summer of 2006.

II. THE PROJECT SITE

A. Site Location

The Subject Property is located on the GW campus and comprises approximately 28,669 square feet of land area. It is situated in the middle of the 2000 block of F Street, N.W. and is located within the Central Business District and adjacent to the Central Employment Area. As shown in the photographs included in Exhibit F, the area surrounding the Subject Property is primarily characterized by high-density commercial and residential uses, as well as institutional use. A number of office buildings, high-density residential apartment buildings, and dormitories are located in close proximity to

the Subject Property. For example, Square 121, located directly across 20th Street from the Subject Property, is zoned C-3-C and is improved with The United Church of Christ, the World Bank, and the Alumni House for GW. The World Bank comprises the majority of the square and is constructed to a height of 130 feet. In Zoning Commission Order No. 274, which approved the World Bank PUD, the Commission recognized that the 130 foot height was appropriate for the site given existing development in the area:

> Immediately to the north, northeast, and east are high density, 130 foot office buildings, one of which houses the International Monetary Fund (IMF) and others which house existing facilities of the World Bank. Additionally to the east is a ninety foot apartment house. To the southeast is the national office of the Federal General Services Administration which is 110 feet in height to the top of the structure. (Zoning Commission Order No. 274 at 2 ¶5.)

The Commission further determined that "Nineteenth and Twentieth Streets are major arterial highways." (*Id.*)

The Zoning Commission recently modified an approved PUD involving Square 122 to allow for GW's Elliot School (Zoning Commission Order No. 746-C). The site is located immediately to the southeast of the Subject Property. That project is constructed to a height of 107 feet and has an FAR of 7.95. It includes 193 beds for students, a parking garage with at least 200 spaces, and academic and ground-floor retail uses. As the Commission observed in the original PUD order:

> Major office development is located to the south, east, and west. Immediately east, across 19th Street, N.W. is the General Services Administration ("GSA") office building

> which is 107 feet in height and occupies the entire square. The American Red Cross local headquarters building is situated west of the site across 20th Street, N.W. and is approximately 66 feet in height.[1] To the south across E Street and a three-block long Federal Park, are the federal Office of Personnel Management and Department of Interior office buildings. (Zoning Commission Order. No. 746 at 2, ¶ 7.)

A 130 foot office building for the International Monetary Fund encompasses the entirety of Square 120, one block to the northeast of the Subject Property. In addition, there are several high-density residential buildings directly south of the site, including the Letterman House condominium (containing 147 units) and the Statesman apartment building. Francis Scott Key Hall, an eight-story student residence hall owned by GW, is located directly to the east and adjacent to the Subject Property. An administrative building that is home to several GW residential programs is located adjacent to the Subject Property to the west. The remainder of the north side of the 2000 block of F Street is occupied by 2035 F Street, a building which houses GW's Museum Studies program, Human Sciences program, and Naval ROTC program.

B. Project Description

The Proposed Project has been designed to maximize on-campus housing while retaining open space and light on F Street. To that end, the residence hall, which will be located on the eastern portion of the site, will be constructed to 120 feet. Because the adjacent buildings are owned and used by GW, the additional height will have no impact

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[1] The American Red Cross building recently was expanded and increased in height to 108 feet.

on those buildings. Moreover, the additional height will have no impact on the nearby high-density residential buildings because they are located across the street from the Subject Property. The Support Building, which is located on the western portion of the Subject Property, and which comprises a greater amount of land area, will remain at its existing height of 46 feet. The existing Support Building functions as the center for facilities operations for the University. It includes offices for facilities management, facilities development, housekeeping, residential property management, mail, risk management, auxiliary and business services, construction programs, and the Office of Architecture, Engineering and Construction. The service area behind the Support Building serves as the central receiving area for deliveries to GW.

The residence hall will primarily consist of two-bedroom dormitory units housing two students per bedroom. Each of those units will house four students. A community director and approximately twelve student facilitators also will reside in the residence hall.

Given the existing pattern of development in the immediate area, the proposed 120 foot height of the residence hall is appropriate for the area. The buildings located across 20th Street from the Subject Property are 130 feet in height. The nearby apartment buildings are approximately 90 feet. Because the residence hall may be constructed to a height of 90 feet as a matter-of-right on the entire site and will occupy less than half the site, the additional height afforded by the PUD and rezoning will not have a significantly greater impact on light, air, and views than would a matter of right building. (See the

renderings of the proposed project and adjacent buildings included in Exhibit F.) The residence hall also will include approximately 1000 square feet of ground-floor retail space, for which the Applicant intends to attract a food-oriented tenant. This retail space will be open to the public.

The residence hall will include approximately 125,000 square feet of gross floor area. The Support Building that will remain on the site includes approximately 24,281 square feet of gross floor area. Thus, the entire site will include approximately 149,281 square feet of gross floor area and will have a total FAR of only 5.2, far less than the 8.0 FAR allowed for a PUD in the C-3-C District. The residence hall and Support Building will occupy less than 80% of the Subject Property, with the residence hall occupying only 32% of the Subject Property.

The residence hall building has been carefully designed to insure that the height and design complement the area. The portion of the building above 90 feet will be constructed of a material that is lighter in color, which will reduce the appearance of height. The façade along F Street is articulated with bays that will add visual interest and relate well to the Support Building and townhouses to the northwest.

Pursuant to § 2405 of the Zoning Regulations, the residence hall building will require relief from the rear yard, penthouse setback, court, and residential recreation space requirements. In order to maximize the capacity to house students, the proposed residence hall will abut the alley to the rear – it will not provide any rear yard. This lack of a rear yard will not be objectionable because the 16 foot wide alley will provide for

adequate light and air. Further, the University owns the abutting properties on F Street, and the University and University-related fraternities own the properties abutting the rear alley. While the building will not satisfy the requirements of the Zoning Regulations for residential recreation space, the University provides ample space for passive recreation on campus, which will be available for residents of the project and their guests. The open courts do not conform with the Zoning Regulations. However, they are wide enough to provide ample light and air to the residence hall and the abutting buildings.

C. Development Parameters Under Existing and Proposed Zoning

The R-5-D District permits a maximum height of 90 feet, a maximum lot occupancy of 75%, and a maximum FAR of 3.5. The PUD guidelines for the R-5-D District allow a height of 90 feet and a maximum FAR of 4.5. The required rear yard for the R-5-D District is 30 feet for a 90 foot building. In the R-5-D District, the minimum width of an open court is 3 inches per foot of height, but not less than 10 feet. There is no residential recreation requirement in the R-5-D Zone. A penthouse structure on the roof of a building must be set back from all exterior walls a distance at least equal to its height above the roof and must not exceed 18 feet, 6 inches in height.

The C-3-C District permits a maximum height of 90 feet, a maximum lot occupancy of 100% and a maximum FAR of 6.5. The PUD guidelines for the C-3-C District allow a height of 130 feet[2] and a maximum FAR of 8.0. The C-3-C District requires a rear yard of 25 feet for a 120 foot building. In addition, the C-3-C District

instructions to students living in University residence halls not to bring cars to campus. Further, the Subject Property is located within walking distance of the Foggy Bottom and Farragut West Metrorail stations and numerous Metrobus lines service the area. Accordingly, the Proposed Project is adequately served by public transportation.

IV. EVALUATION STANDARDS

Section 2403 of the Zoning Regulations provides the standards for evaluating a PUD application. The project must provide superior public benefits and project amenities, comply with the Comprehensive Plan, and provide an acceptable impact on city services and facilities. In deciding a PUD application:

> ... the Commission shall judge, balance, and reconcile the relative value of the project amenities and public benefits offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case.

11 DCMR § 2403.8.

Here, the balance weighs strongly in favor of approval. The Proposed Project offers the significant public benefit of providing more on-campus housing, a use that is of special value to the Foggy Bottom neighborhood. Moreover, the new residence hall will transform the current surface parking lot into a building offering superior design and attractive landscaping. The Proposed Project also will mitigate adverse traffic impacts because this residence hall will be covered by the University's instruction to student residents not to bring cars to campus, and the student residents will be able to walk to

classes and other university-related activities. The Proposed Project also complies fully with the Campus Plan because it is located in a site that is designated for residence hall use.

A. Public Benefits and Project Amenities

Section 2403.9 provides categories of public benefits and project amenities for review by the Zoning Commission. The objective of the PUD process is to encourage high quality development that provides public benefits and project amenities by allowing applicants greater flexibility in planning and design than may be possible under matter-of-right zoning. The increase in on-campus housing is the single most important public benefit associated with the Proposed Project.

1. Housing and Affordable Housing

Under Section 2403.9(f) of the Zoning Regulations, the PUD guidelines state that the production of housing is a public benefit that the PUD process is designed to encourage. In furtherance of this important goal, the proposed PUD project will provide housing for approximately 530 GW students. Through a further processing application under the existing zoning, GW could build 280 beds. The C-3-C PUD provides the public benefit of 250 additional beds with no impact, with the additional benefit of ground-floor retail.

2. Uses of Special Value to the Neighborhood

Section 2403.9(i) lists uses of special value to the neighborhood as public benefit. Providing additional on-campus housing to GW students is decidedly a use of special value to the Foggy Bottom neighborhood.

One of the central themes throughout the approval process for GW's Campus Plan was the need for more on-campus housing for undergraduate students. In the ANC's report dated April 17, 2000, the ANC asserted that "GW does not have sufficient dormitory space within the campus plan boundaries to house its students." (ANC report dated April 17, 2000 at 3, R. 616.) Further, the ANC stated that "ANC 2A has a long-standing policy and goal ... that GWU should provide housing for all undergraduate students within the boundaries of the current campus plan ...." (*Id.* at 4, R. 617.) The ANC also argued that two sites, providing beds for 420 students, are "not sufficient." It went on to say that "[a]dditional sites within the campus plan boundaries should be designated for construction of dormitories...." (*Id.* at 8, R. 621.) The University designated additional sites, and the projects in Squares 43 and 57 alone will produce 932 beds, far in excess of the 420 originally proposed in the Plan.

The District of Columbia Office of Planning ("OP") also has indicated that housing more students in on-campus dormitories will be of significant and particular benefit to the Foggy Bottom neighborhood. The report submitted by OP on April 21, 2000 stated: "Presently, there is insufficient housing within the boundary of the campus, and new housing will be needed." (Report of Office of Planning dated April 21, 2000 at

2, R. 1184.) OP also identified Square 103 as an appropriate site for additional student housing. (*Id.* at 17, R. 1199.) In its supplemental report dated September 8, 2000, OP asserted that "not enough housing has been provided by GW." (Report of Office of Planning dated September 8, 2000 at 8, R. 1643.) OP supported the University's proposal to "include in the Plan sites for approximately 850 beds on campus on Squares 80 and 103." (*Id.* at 15, R. 1651.)

The BZA, in its order approving the Campus Plan, addressed the above housing concerns. The approved plan document in fact included significant new residence hall space. This application will implement the approved Campus Plan and therefore respond to those concerns.

3. Urban Design, Architecture and Landscaping

Section 2403.9(a) lists urban design and architecture as categories of public benefits and project amenities for a PUD. The proposed residence hall has been sensitively designed to complement the existing buildings in the surrounding neighborhood. It will contribute to the streetscape by providing a superior design and attractive landscaping.

4. Site Planning

Pursuant to Section 2403.9(b) of the Zoning Regulations, the Zoning Commission must evaluate "site planning, and efficient and economical land utilization" as a public benefit and project amenity. The Proposed Project constitutes desirable infill development, which has been carefully designed and sited on the Subject Property so as

to maximize benefits of the project to the District as well as to the residents of the Foggy Bottom neighborhood. It is located within the Campus Plan boundaries, which will thereby concentrate the institutional use within the desired area. Further, the proposed increased height of the project is designed to maximize the number of students who can be housed in the residence hall. The height of the existing Support Building will remain two stories, which will ensure adequate light and air to the buildings along F Street.

5. Effective and Safe Vehicular and Pedestrian Access

The Zoning Regulations, pursuant to Section 2403.9(c), state that "effective and safe vehicular and pedestrian access" can be considered one of the public benefits and project amenities of a project. The proposed project will have a positive impact on the overall transportation infrastructure in the area near the Subject Property because the students residing in the residence hall will be able to walk to classes and other activities on campus. Further, the University intends to include this facility in its instructions to students residing in the residence hall not to bring cars to campus.

6. Comprehensive Plan

According to Section 2403.9(j), public benefits and project amenities include "other ways in which the proposed planned unit development substantially advances the major themes and other policies and objectives of any of the elements of the Comprehensive Plan." As described in greater detail in Section V, the PUD is consistent with and furthers many elements and goals of the Comprehensive Plan.

B. The George Washington University Campus Plan

The Proposed Project is consistent with the Campus Plan, which designated the site for residential development. The BZA specifically identified Square 103 as one of the on-campus areas "suitable for additional dormitories." Moreover, the BZA noted that the ANC identified Square 103 as suitable for residence hall use. The Subject Property also is located at the perimeter of the Campus Plan boundaries. The Campus Plan document, as approved by the Order, explained that "university-related residential uses are generally located on the periphery of the central campus core." (2000 Campus Plan, p. 24.) The residence hall will eliminate 60 current surface parking spaces. However, GW will provide approximately 89 spaces in Square 43 alone, and the University will continue to maintain the required 2800 parking spaces on campus.

V. COMPLIANCE WITH THE COMPREHENSIVE PLAN

The proposed PUD furthers the goals and policies stated in the elements of the District of Columbia Comprehensive Plan, ("**Comprehensive Plan**") D.C. Law 12-275, 10 DCMR (Planning and Development) § 100 et seq. (1998), particularly those within the Land Use and Ward 2 Elements.

The purposes of the District of Columbia Comprehensive Plan Act are to:

> (1) Define the requirements and aspirations of District residents, and accordingly influence social, economic and physical development; (2) Guide executive and legislative decisions and matters affecting the District and its citizens; (3) Promote economic growth in jobs for District residents; (4) Guide private and public development in order to achieve District and community goals; (5) Maintain and enhance the

> natural and architectural assets of the District; and (6) Assist in conservation, stabilization and improvement of each neighborhood and community in the District.

(D.C. Code § 1-245(b) (1994 Supp.))

The proposed project significantly advances these purposes by furthering the social and economic development of the District through guiding the development of institutional uses in the District and working to stabilize the Foggy Bottom neighborhood by housing more students on campus.

A. Compliance with Major Themes

Two major themes that are applicable to this project were adopted as part of the Comprehensive Plan. The Proposed Project furthers the policies of stabilizing the District's neighborhoods and respecting and improving the physical character of the District.

1. Stabilizing the District's Neighborhoods

As a surface parking lot, the Subject Property neither provides significant benefit to, nor helps stabilize, the Foggy Bottom neighborhood. The Proposed Project, on the other hand, will provide housing for approximately 530 GW students in a dormitory setting. The creation of a residence hall within the boundaries of the GW Campus Plan supports the theme of stabilizing the District's neighborhoods.

2. Respecting and Improving the Physical Character of the District

The creation of a residential building on the site of an existing surface parking lot is a significant improvement to the physical character of the District. Moreover, this project is entirely consistent with the District's goals for reducing traffic. Because the

residence hall is located on campus, the residents will be able to walk to school and GW-sponsored events. In addition, the residence hall is located within walking distance of the Foggy Bottom and Farragut West Metrorail stations. Although the residence hall provides no parking, ample parking is available elsewhere on campus in designated areas.

B. Compliance with Major Elements

The Comprehensive Plan also contains 11 major elements. The proposed project furthers the objectives and policies of several of these elements as follows:

1. Housing Element

The Comprehensive Plan notes that:

> Housing in the District is viewed as a key part of a total urban living system that includes access to transportation and shopping centers, the availability of employment and training for suitable employment, neighborhood schools, libraries, recreational facilities, playgrounds, and other public amenities. (10 DCMR § 300.4.)

In addition, the Comprehensive Plan includes the following goals of the District with regard to the production of new housing:

> Encourage the private sector to provide new housing to meet the needs of present and future District residents at locations consistent with District land-use policies and objectives (10 DCMR § 302.2(a));
>
> Encourage housing on suitably located public or private properties that are vacant, surplus, underutilized, or unused, . . . (10 DCMR § 302.2(e));

and

> Encourage the private sector to meet housing needs through the development of infill housing . . . (10 DCMR § 302.2(f)).

As discussed throughout this statement, the proposed project will provide an excellent opportunity to maximize on-campus housing by creating housing for approximately 530 GW students. Furthermore, the residence hall constitutes desirable infill housing. Finally, the residence hall is conveniently located because it is adjacent to the major commercial downtown area as well as the Foggy Bottom and Farragut West Metrorail stations. Thus, the Proposed Project fully satisfies the above-mentioned goals of the Comprehensive Plan's Housing Element.

Moreover, the proposed Zoning Map amendment from the R-5-D to the C-3-C District is entirely consistent with the Comprehensive Plan's objectives of providing zoning incentives to achieve the goals for the production of new housing.

2. Environmental Protection Element

The District's goal under the Environmental Protection Element is to

> protect the environment, to resist threats to its overall quality, to act, [sic] to maintain and enhance its positive features in the interest of residents, workers, and visitors, and to protect residential communities from identified environmental hazards by implementing controls that prevent adverse impacts from incompatible uses. (10 DCMR § 401.1.)

The Proposed Project will further the environmental goals of the District because it will help improve air quality and enhance the streetscape of the District.

One environmental objective is to improve the quality of the air in the District and the region so as to meet public health and environmental standards. (10 DCMR § 403.1.) The

students living in the residence hall will be instructed by the University not to bring cars to the District. Thus, the Proposed Project will improve air quality by "[p]romoting land use patterns and transportation services which decrease reliance on automobiles for commuting and other routine trips." (10 DCMR § 403.2(c).)

Another environmental objective of the District is to improve the streetscape.

> The streetscape objective is to establish a clear classification of streets and sidewalks that is functionally efficient and visually coherent, enhances the pedestrian environment, and provides for the orderly movement of goods and services.

The Proposed Project will further the streetscape objective by eliminating the existing curb cut on F Street, very near to the major arterial of 20th Street. The elimination of the curb cut will "[r]educe conflicts between pedestrians and vehicular traffic in order to increase pedestrian safety and comfort."

3. Urban Design Element

With regard to urban design, it is the goal of the District to:

> preserve and enhance the outstanding physical qualities of the District neighborhoods. (10 DCMR § 702.1(b).)

The Urban Design Element also expressed the desire to:

> Design buildings to include the use of appropriate arrangements of building materials, height, scale, massing, and buffering to complement the immediate region. (10 DCMR § 708.2(b).)

The project preserves and enhances the distinguishable physical qualities of the District and the architectural design of the surrounding buildings. It is designed to complement and be consistent with the architecture, height, scale and massing of the

surrounding buildings. The plans propose to use construction materials of a lighter color for the areas above 90 feet in order to minimize the appearance of additional height. Further, the residence hall will complement the immediate area, which is included in the GW Campus Plan and which is primarily devoted to high-density commercial, high-density residential, and University use.

4. Generalized Land Use Map

The Generalized Land Use Map includes the Subject Property in the institutional land use category. The proposed residence hall is entirely consistent with this land use designation. Moreover, the proposed C-3-C Zone District is entirely consistent with the Generalized Land Use Map because the Subject Property is located adjacent to the high-density commercial land use category to the east. The proposed residence hall also complements the area to the south of the Subject Property, which is designated for high-density residential use. The rezoning of a property from residential to commercial to maximize housing is especially appropriate give the surrounding land use map designations.

5. Land Use Element

The proposed project also complies with the Land Use Goals for both residential and institutional land uses. One of the objectives for residential neighborhoods is to achieve stability. (10 DCMR § 1102.1.) The residence hall will help the neighborhood achieve stability by converting a parking lot into housing for GW students. The Proposed Project also complies with the objectives for public and institutional land uses, such as "assur[ing] neighborhood stability as nongovernment institutions grow" and "promot[ing] the continued

contributions made by private institutions toward the economic and cultural vitality of the District." (10 DCMR § 1112.1(e), (h).) The Comprehensive Plan identifies policies that support these objectives, such as:

> Recognize the specialized land needs and unique economic and human development opportunities presented by colleges, universities, and other institutional users of large tracts and require the development of detailed master plans, if none exist that incorporate all land and facilities currently in use or currently owned by the institution and anticipated for future use .... (10 DCMR § 1115.1(k).)

The proposed project will further these policies because it will be constructed in compliance with the GW Campus Plan, will allow for opportunity for citizen participation, and will increase on-campus housing.

6. Ward 2 Goals and Policies.

The Subject Property is located within the Foggy Bottom neighborhood of Ward 2. The Comprehensive Plan states:

> ... The University must continue to construct student dormitories to alleviate the pressure on the housing stock outside the boundaries of the campus plan. (10 DCMR § 1358.1.)

Further, the Ward 2 Element of the Comprehensive Plan provides that the Foggy Bottom community should address "the student housing issues by planning for future dormitories...." (10 DCMR § 1342.1(b).)

The proposed residence hall will house 530 students who otherwise may have chosen to live off-campus in Foggy Bottom. Further, the proposed project will not

contribute to traffic in the neighborhood because the students will be able to walk to classes. Thus, the project fully satisfies the Ward 2 objectives of the Comprehensive Plan.

VI. CONCLUSION

For the foregoing reasons, the consolidated PUD and Zoning Map amendment request meets the standards of Chapter 24 of the Zoning Regulations; is consistent with the purposes and intent of the Zoning Regulations and Map; will enhance the health, welfare, safety and convenience of the citizens of the District of Columbia; will satisfy the requirements for approval of a consolidated PUD and Zoning Map amendment; will provide significant public benefits; and will advance important goals and policies of the District of Columbia. Therefore, the consolidated PUD application and Zoning Map amendment should be approved and adopted by the Zoning Commission.

Accordingly, the Applicant respectfully requests the Zoning Commission to set the PUD and accompanying Zoning Map amendment applications down for a public hearing at the earliest possible date.

Respectfully submitted,

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