THE GEORGE WASHINGTON UNIVERSITY
Square 103 Residence Hall



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PREHEARING STATEMENT
DISTRICT OF COLUMBIA ZONING COMMISSION FOR CONSOLIDATED REVIEW AND APPROVAL OF A PLANNED UNIT DEVELOPMENT

ZONING COMMISSION
District of Columbia
Case 03-29
Exhibit 19

December 5 , 2003

ZONING COMMISSION
District of Columbia
CASE NO.03-29
EXHIBIT NO.19

DEVELOPMENT TEAM

APPLICANT:	The George Washington University The Office of Architecture, Engineering and Construction 2025 F Street, NW Washington, DC 20052
ARCHITECTS, ENGINEERS AND CONSULTANTS:	Ayers/Saint/Gross Architects 800 Eye Street, NW Suite 600 Washington, DC 20001
LAND USE COUNSEL:	Shaw Pittman, LLP 2300 N Street, NW Washington, DC 20037

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Application Form	C
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CERTIFICATION OF COMPLIANCE WITH SECTION 3013 OF THE ZONING REGULATIONS

The George Washington University hereby certifies that this prehearing statement, twenty copies of which were filed with the Zoning Commission on December 5, 2003, complies with the provisions of Section 3013 of the Zoning Regulations as set forth below and that the application is complete. Certain minor areas of flexibility will be required in connection with this PUD, For example, the Applicant must be able to make minor adjustments to address any final comments from the Commission of Fine Arts. Also, the Applicant will require minor flexibility in the unit count. These exact areas of flexibility will be submitted at the hearing.

The George Washington University further certifies that certain modifications have been made to the project which address the comments of the Commission of Fine Arts, Office of Planning, and Zoning Commission. These modifications include: (i) withdrawing the application for an amendment to the Zoning Map; (ii) reducing the height of the proposed building to ninety feet; and (iii) adding the additional amenities of providing an environmentally sensitive design for the building and renovating Quigley's.

Sub - Section		**Location**
3013.1(a)	Information Requested by the Zoning Commission	Prehearing Statement
	Additional Information, Reports or Other Materials Which the Applicant Wishes to Introduce	Prehearing Statement, Exhibits B, H, I
3013.1(b)	List of Witnesses	Prehearing Statement
3013.1(c)	Summary of Testimony of Applicants Witnesses and Reports for the Record	

	Outline of Testimony of Representative of the Applicant The George Washington University	Exhibit L
	Outline of Testimony Representative of the Architect Ayers/Saint/Gross	Exhibit M
3013.1(d)	Other Information Including Written Reports	N/A
3013.1(e)	Reduced Plans	Exhibit B
3013.1(f)	List of Publicly Available Maps, Plans, and Other Documents	Exhibit G
3013.1(g)	Estimated Time Required for Presentation of Applicant's Case	1.0 hour
3013.2	Two Sets of Full Sized Plans	Submitted Herewith
3013.3	List of Names and Address of the Owners of the Property Proposed to be Rezoned	N/A
3013.6(a)	List of Names and Addresses of All Property Owners within 200 Feet of the Subject Site	Exhibit E
3013.6(b)	List of Names and Addresses of Each Person Having a Lease with the Owner for All or Part of Any Building Located on the Property Involved in the Application	N/A

LIST OF WITNESSES AND ESTIMATE OF TIME REQUIRED TO PRESENT CASE

WITNESSES:

Charles Barber, Senior General Counsel, The George Washington University

Representative of the Architect, Ayers/Saint/Gross

ESTIMATED TIME REQUIRED TO PRESENT CASE:

1.0 hour

PREFACE

The George Washington University ("**Applicant,**" "**GW**" or "**the University**") submits this prehearing statement in support of an application for the consolidated review and one-step approval of a Planned Unit Development ("**PUD**") as part of its efforts to increase on-campus housing as required by the Board of Zoning Adjustment (the "**BZA**" or the "**Board**"). In approving GW's 2000 Campus Plan (the "**Plan**"), the BZA required the University to provide a minimum of 5600 beds on-campus 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 creating additional beds on-campus.

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 community and the Office of Planning identified the need for more on-campus housing for GW students as a paramount issue. This application demonstrates the University's commitment to responding to this issue.

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 for 200 beds. If the

Commission approves the requested PUD, the University will be able to add approximately 180 more beds on this site than shown in the Campus Plan.

This PUD application represents GW's effort to maximize housing on Square 103 on an expedited schedule. In the Spring of this year and in the midst of constructing two new residence halls, GW engaged Ayers/Saint/Gross Architects to study various ways to achieve a larger number of beds on the site than the 200 shown in the Campus Plan. In early June, GW met with representatives of the District of Columbia Office of Planning ("**OP**") to review the proposed plans for the site. GW submitted an application for a Consolidated PUD and Zoning Map Amendment for Square 103 on July 30, 2003. The initial application included a proposed design that would have enabled the University to provide 530 beds. In order to provide the maximum number of beds, GW requested a rezoning to C-3-C and a height of 120 feet.

In response to the concerns of the Commission of Fine Arts ("**CFA**"), as expressed in a meeting in July, the University redesigned the building after the filing of the PUD to include a setback of the upper two stories, which reduced the number of beds that GW could provide on the site to 490. Following additional meetings with OP and CFA approval of the concept of the height at a meeting on October 20, OP prepared a report recommending setdown of the application. The OP report, filed the Commission on October 31, 2003, stated that the project "would provide a major amount of new student housing on the George Washington University campus." Accordingly, the report generally concluded that "the application is consistent with the purpose of the planned unit development process ...." OP's report also recommended that the Zoning Commission advertise for both the rezoning from R-5-D to C-3-C and an alternative rezoning of the site to R-5-E. Instead, at its monthly meeting on November 12, 2003, the

Commission decided to consider the PUD only under the existing R-5-D zoning. In response to the Commission's action, GW has reduced the height of the building to 90 feet – the maximum height permitted as a matter of right in the R-5-D Zone District. This application continues to require relief from the rear yard, penthouse, lot occupancy, and court requirements, as described herein. If approved, this application will provide a maximum of only 380 beds – 150 fewer beds than if the application had been approved as originally submitted. This may substantially affect GW's ability to meet its obligations set forth in BZA Order No. 16553F. Nonetheless, the project still offers a significant addition to the on-campus housing stock.

THE PROPOSED PUD

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 residence hall comprising approximately 380 beds (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. This PUD application contemplates development under the existing R-5-D 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:

- Approximately 380 new beds within the Campus Plan boundaries;
- approximately 1000 square feet of university and public retail space on the ground floor;
- provision of a new food service facility at Quigley's, an existing building located on the northwest portion of Square 103;
- a new, more attractive streetscape for the portion of F Street located in front of the new building; and
- a superior, environmentally sensitive design.

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; and
- 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 prehearing statement, the Applicant hereby submits a revised application form, architectural drawings, and certain exhibits as set forth in the list of exhibits. As set forth below, this statement and the attached documents meet the filing requirements for a PUD prehearing statement 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. The Subject Property 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.

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, requested that the BZA require

GW to provide more student housing within the Campus Plan boundaries. During the Campus Plan hearings, OP testified that it would support the concept of using flexible zoning guidelines with regard to building height and density in order to maximize housing on campus. This application directly addresses the University's commitment to increasing on-campus housing on an expedited basis, 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 Applicant's objective is to maximize on-campus student housing under the existing R-5-D Zoning 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 more 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.

D. Development Timetable

The Applicant plans to start construction as soon as possible after the Commission's

approval to allow the completion of the project by late summer of 2006. In light of the requirements of the Campus Plan, the timing of the project is critical.

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 B, 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.

B. Project Description

The Proposed Project has been designed to maximize on-campus housing under the existing zoning. The residence hall will primarily consist of two-bedroom dormitory units housing two students per bedroom. Generally, each of those units will house four students. A community director and approximately eight student facilitators also will reside in the residence hall. The residence hall 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 Support Building, which is located on the western portion of the Subject Property, and which comprises a greater amount of land area, is currently built to a height of forty-six 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 include approximately 90,000 square feet of gross floor area. The Support Building includes approximately 24,281 square feet of gross floor area. Thus, the entire site will include approximately 114,281 square feet of gross floor area and will have a total FAR of 3.98, which will be aggregated with the total FAR for the campus. The residence hall and Support Building will occupy 77.7% 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 design complements the area. 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, and the proposed design includes a new, more attractive streetscape plan for the portion of F Street fronting the building.

Pursuant to § 2405 of the Zoning Regulations, the residence hall building will require relief from the rear yard, penthouse setback, lot occupancy, and court requirements. This relief allows approximately 100 more beds than would be permitted absent such relief. 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. 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. For the same reasons, the slightly increased lot occupancy will not be objectionable to neighboring properties.

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 – although the aggregation rule that applies to residentially zoned property in campus plans would permit greater density as long as the overall campus cap of 3.5 is observed. 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 space 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.

As set forth in the Tabulation of Development Data, the proposed project requires relief from the penthouse setback, rear yard, lot occupancy, and court requirements of the Zoning Regulations. Under the above mentioned guidelines, the proposed project would require a court of 22 feet 6 inches, a penthouse setback of 18 feet 6 inches, a rear yard of 30 feet, and a lot occupancy of 75%. The proposed project will provide courts of 13 feet, no rear yard, a penthouse setback of 4 feet 8 inches in some areas, and a lot occupancy of 77.5%.

D. Flexibility under the PUD Guidelines

A significant benefit of the PUD process is that it provides the Applicant a certain degree of flexibility from the requirements of the Zoning Regulations in return for meeting District and neighborhood planning goals. As set forth above, the Applicant is requesting relief from the penthouse setback, rear yard, lot occupancy, and court requirements of the Zoning Regulations. Under 11 DCMR § 2405.4, , the Commission is authorized to approve a lot occupancy greater than the normal requirement. Section 2405.5 authorizes the Commission to approve yards and courts lesser than the normal requirements. The Applicant believes that this flexibility is warranted because the project is of exceptional merit and is in the best interest of the city.

E. Review by The Commission of Fine Arts

The CFA has indicated that any construction on the Subject Property requires CFA review. The Applicant presented the project to the CFA on July 17, 2003, and October 16, 2003. The CFA approved of the general concept of a 120 foot height. GW has since modified the design so that it meets the matter-of-right height requirements for the R-5-D Zone District and will return to CFA in December.

III. PLANNING ANALYSIS

A. Introduction

Through the PUD process, the Applicant will achieve an important goal of the Comprehensive Plan – increasing available on-campus housing for students. In addition, the project will provide 1000 square feet of public retail space along F Street, which will contribute to retail opportunities in the area. Further, it will include the renovation of Quigley's, an important amenity that will provide more food service facilities in the neighborhood. The Proposed Project also will feature an environmentally sensitive design, which will further the

District's goal of preventing adverse environmental impacts. Finally, it will provide a new, more attractive streetscape plan on that portion of F Street on which the building fronts.

B. Land Use Impact

The Subject Property comprises a surface parking lot, the two-story Support Building, and a service area. The proposed residence hall, including the 1000 square foot retail space at grade, is entirely appropriate for the Subject Property from a land use perspective. The Subject Property is located within the Campus Plan boundaries of GW and is located in the area designated for institutional use on the District of Columbia Generalized Land Use Map. Furthermore, the Subject Property is located within the Central Business District and adjacent to the Central Employment Area.

C. Zoning Impact

The construction of this project will not result in an adverse zoning impact. As set forth above and as detailed in the attached Tabulation of Development Data, the project will be constructed consistent with the R-5-D Zone District except for the rear yard, court, lot occupancy, and penthouse requirements. The flexibility in these areas requested by GW will not have an adverse impact on neighboring properties because GW is the owner of all adjacent properties.

D. Environmental Impact

As more specifically detailed in Exhibit F, the construction of this project will not result in an adverse environmental impact. The increased use of water and sanitary services that will occur as a result of the project will have an inconsequential effect on the District's delivery systems. The Subject Property currently is served by all major utilities. The project's proposed stormwater management and erosion control plans will minimize impact on the adjacent property

and existing stormwater systems. The requisite erosion control procedures stipulated by the District will be implemented during construction of the project.

E. Facilities Impact

The Proposed Project will not have an adverse impact on the public facilities on which it will rely for service. As previously mentioned, the Subject Property is located within the Campus Plan boundaries of The George Washington University. Accordingly, the residents of the residence hall will not be required to drive to classes and other GW-sponsored activities. Indeed, the University intends to include this facility in its 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. Finally, the proposed project will provide these benefits within the existing zoning for the site.

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 in a matter-of-right project. 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 380 GW students. Through a further processing application under the existing zoning, GW could build only 280 beds.

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. 143.) 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.) Indeed, Director Andrew Altman testified:

> [W]e were very willing to go back and relook [sic] at the overall density cap for the campus or the density or height restrictions on individual parcels within the campus if, by virtue of shifting more density onto those sites, we could accommodate academic needs on one place and free up sites for housing or if we could increase density or increase height and accommodate more housing on a particular site and free up other academic sites.

(R. 2357).

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. In addition, it has been designed to meet the requirements of the Leadership in Energy and Environmental Design rating system for a "green" building. Finally, 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 on a parking lot within the Campus Plan boundaries, which will thereby concentrate the institutional use within the desired area.

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 minimum of 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 380 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 eleven 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 380 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.

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."

GW also intends to design the building in an environmentally sensitive manner, and plans to apply for a rating under the Leadership in Energy and Environmental Design Green Building Rating System.

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. 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. The proposed residence hall also complements the area to the south of the Subject Property, which is designated for high-density residential use.

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 approximately 380 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 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; will provide significant public benefits; and will advance important goals and policies of the District of Columbia. Therefore, the consolidated PUD application should be approved and adopted by the Zoning Commission.

Respectfully submitted,

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