GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF PLANNING

Office of the Director

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Andrew Altman
Director

DATE: February 9, 2004

SUBJECT: **Report on Zoning Commission Case No. 03-29**: Application of George Washington University for Consolidated Review and Approval of a Planned Unit Development for a Square 103 Residence Hall

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I. RECOMMENDED ACTION

The Office of Planning (OP) recommends that the Zoning Commission approve Zoning Commission Case No. 03-29, the application of George Washington University (GWU) for Consolidated Review and Approval of a Planned Unit Development for a new residence hall on Lot 817, Square 103, within the George Washington University Campus.

ZO[illegible] Commission
District of Columbia
Case 03-29
Exhibit 31

BACKGROUND

Campus Plan Process

This application for consolidated review and approval of a planned unit development for the Square 103 Residence Hall comes after a long process of several years of review and approval of "The George Washington University Foggy Bottom Campus Plan, Years 2000 through 2009" by the Board of Zoning Adjustment (BZA). The process has involved disagreements among the parties and litigation, some of which is continuing, over some aspects of the BZA decision on the Campus Plan. The Zoning Commission will need to review and evaluate this proposed Square 103 GWU Residence Hall PUD within the framework of the Campus Plan as approved by the BZA, and the BZA orders (see discussion below).

Initial Proposed PUD by GWU

The George Washington University filed its request for a Consolidated PUD and Zoning Map Amendment for the Square 103 Residence Hall with the Zoning Commission on July 30, 2003. The initial application requested consolidated approval of a Planned Unit Development ("PUD") and approval of a PUD-related map amendment from R-5-D to C-3-C. At that time, the residence hall building was proposed to have 125,000 square feet of gross floor area, a height of 120 feet at the front

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building line, and provide 530 beds (529 of which would be undergraduate student beds). Later, to address concerns about the height of the building raised in a July 17 review by the Commission of Fine Arts, the University revised the design to provide a setback of the upper two floors, reducing the number of beds to 490. The Office of Planning prepared a setdown report recommending that the case be set down for a hearing but expressed concern about the rezoning and the additional height in this area. The Office of Planning recommended that the proposal for rezoning to R-5-E with a PUD be advertised as an alternative.

Zoning Commission Setdown Action

At their meeting on November 12, 2003, the Zoning Commission directed that the proposed PUD be set down for a hearing with the existing R-5-D zoning, which means the maximum height would be 90 feet.

Revised Proposed PUD by GWU

In response to the setdown decision by the Zoning Commission, George Washington University submitted a revised application and preheating statement on December 5, 2003. The building height is reduced to 90 feet. GWU's statement indicated that relief from the rear yard, penthouse, lot occupancy and court requirements would still be required. GWU indicated that the number of beds would be reduced to a maximum of 380 beds. In the revised application with the 90-foot height, GWU also scaled back the elements of the amenity package. The specifics of the revised project, the relief requested and the revised amenity package are described in more detail below.

II. CONTEXT

The Area Context

The site of the proposed PUD is lot 817, Square 103, located on the north side of F Street, N.W. in the center of the block between 20th and 21st streets, N.W. In this block face (2000 block of F Street, N.W.) the southern border of The George Washington University campus extends along F Street (see Attachment 1 that shows the zoning for the area around the site and the location of the GWU campus boundary as most recently approved by the BZA). GWU owns most but not all of the property in Square 103.

The PUD site, described more fully below, includes the GWU Service Building and a parking lot where the proposed residence hall is to be constructed. Francis Scott Key Residence Hall (eight stories, approximately 90 feet in height) occupies the southeast corner of the square, just east of the proposed new residence hall. The west end of Square 103 along F Street is occupied by five low buildings (3-4 stories). All but the corner building are owned by GWU. The north side of Square 103, along G Street, is occupied by eight small buildings (3-4 stories) interspersed with parking lots. Most but not all of these properties are owned by GWU. The Campus Plan indicates future Academic/Administrative use for the north side of Square 103. The "Quigley's" building (GWU property) at the northwest corner of Square 103(southeast corner of 21st and G Streets, NW.) is proposed to be renovated and expanded and used for a restaurant. This will be a university use but will also be open to the public. This expanded building and use is proposed as an amenity for the Square 103 Residence Hall PUD.

South of the project site, on the south side of the 2000 block of F Street (Square 104) and outside the GWU campus boundary, are three private apartment buildings. From east to west these are the Empire, the Statesman and the Letterman (condominium), all approximately 90 feet high. The York Apartments are around the corner on 20th Street. The southern part of Square 104 is occupied by the new Red Cross Building that is 108 feet high (see Attachments 4 and 5). This is somewhat lower relative to the buildings on F Street since the land slopes down from F Street to E Street.

Square 121 to the east is zoned C-3-C, through a PUD, except for the United Church property (landmark building) at the northwest corner of the Square which is R-5-D. It includes the lower landmark building at 1925 F Street (the GWU Alumni House). The east side of Square 121 is occupied by one of the World Bank Buildings that is 130 feet high facing 19th Street but steps down on its west side to 60 feet to relate to the lower landmark buildings (the United Church and 1925 F Street).

Square 122 is southeast of Square 103 and is now all GWU property except for a private parking structure on 20th Street. Two GWU residence halls (Thurston Hall and Mitchell Hall) are on the east side of Square 122. The new GWU Elliott School Building, constructed as a PUD, is located on the south edge of Square 122, facing E Street. It has both academic space and residential space (facing 20th Street) with 193 beds. This building has a height of 107 feet, though the height relative to buildings on F Street is somewhat lower due to the slope of the land from F to E streets.

In summary, the area around the proposed Square 103 Residence Hall has a mix of uses, including GWU uses (academic, administrative and residential uses), private residential apartment buildings on the south side of F Street and both low-rise historic buildings and high-rise office buildings for the World Bank and International Monetary Fund to the east and northeast.

The Campus Plan Context

The Campus Plan context includes both the guidance of the Campus Plan on housing on Square 103, including this site, and the requirement of the BZA orders for overall undergraduate student housing on campus.

The Proposed Land Use Map (Figure E) in the approved Campus Plan indicates the proposed PUD site as a mix of Academic/Administrative and Residential/Campus Life/Athletic use. This means that the combination of the existing GWU service building and the proposed residential development on the existing parking lot is consistent with the Campus Plan.

Residential/Campus Life/Athletic use is indicated for a site at the west end of Square 103 that is occupied by five small buildings. GWU owns all but the corner building on that indicated site. The site at the east end of Square 103 is also indicated Residential/Campus Life/Athletic and that is the existing Francis Scott Key Residence Hall. The Development Sites Map-Residential/Campus Life/Athletic (Figure O in the campus plan) indicates the west end of Square 103 as a preferred site for development. It does not indicate residential development on the parking lot site for this stage of the campus plan. However, since GWU does not own all the properties on the west end of Square 103, and GWU has an urgent need to develop new undergraduate student housing to meet the BZA requirements (see below), the University has decided to move ahead with the proposed new residence hall on the parking lot just west of Francis Scott Key Hall (see the description of the proposal below). The Campus Plan indicates that buildings housing athletic facilities and University-related residential uses will continue to be

located on the periphery of the central campus core (page 25, Foggy Bottom Campus Plan, May 3, 2002). This proposed dormitory is located on the southern edge of the George Washington University Campus.

The BZA Order for the Campus Plan (BZA Application 16553, Condition 9) requires the University to provide 5,600 beds on the GWU Campus by August 31, 2006, plus one bed per student for every full-time undergraduate student over 8,000 (the "base number"). GWU has recently completed 204 beds on Square 57 and has another 728 beds under construction in the Ivory Tower Residence Hall on Square 43, to be completed by Fall 2004. This is a total of 932 new beds recently completed or now under construction. By constructing 379 additional new student beds in a PUD on Square 103, as described below, GWU would come close to meeting the BZA requirements by the Fall of 2006 (exact compliance would depend on the total enrollment in Fall 2006, a figure that GWU can control).

If the Zoning Commission approves the proposed PUD for 379 new student beds, GWU would plan to start construction of the Square 103 Residence Hall in Summer 2004. The building would then be completed in time for Fall 2006. Delay would mean the University would miss the Fall 2006 deadline. Understanding this framework of the Campus Plan makes it clearer why GWU is trying to maximize the number of beds in a new residence hall on this PUD site.

III. PUD PROPOSAL

PUD Site

GWU plans indicate that this PUD site, Lot 817 in Square 103, has a frontage of 238.7 feet along F Street and a depth of 120.79 feet. The overall site area is 28,669 square feet. The site meets the minimum area requirements (15,000 square feet) for a PUD in an R-5-D District. The site has two parts.

The western portion of the PUD site is the existing GWU Support Building that is three stories (46 feet) high and has a frontage of 150 feet. The Support Building is the center for facilities operations for GWU. The service area in the rear of the Support Building is the central receiving area for deliveries to the University. The Support Building will remain in its present configuration as part of this PUD. The area of the western portion of the PUD site is approximately 17,956 square feet.

The eastern portion of the PUD site, with a frontage of 88.69 feet, is now a surface parking lot. It has 60 parking spaces, some of them stacked. This is the site where the new residence hall is proposed to be constructed. The area of the parking lot is approximately 10,713 square feet. Including the area of the GWU Support Building allows the overall site to meet the minimum area requirement for a PUD.

Those 60 parking spaces in the existing parking lot would be removed when construction begins. The University will gain 88 spaces in Square 43 (Ivory Tower residence hall) in August 2004. The total parking spaces on the GWU Foggy Bottom Campus will still be more than the 2,800 total parking spaces that are required by the campus plan.

The application indicates that the Residence Hall will have approximately 90,000 square feet of gross floor area and the Support Building, which will remain, includes approximately 24, 281 square feet of gross floor area, a total of approximately 114,281 square feet of gross floor area. The overall PUD site will therefore have a total FAR of 3.98, less than the 4.5 FAR allowed for a PUD in the R-5-D District. In fact, the additional FAR will be aggregated within the total FAR for the entire campus. By including the entire site, the density of the new Residence Hall is being spread over a larger area.

The Proposed Residence Hall

The Residence Hall is proposed to be 90 feet high with 10 stories. The Residence Hall would provide for 379 student beds. Most of the students would live in residential suites, composed of two bedrooms with two students per bedroom or four students to a suite. One bathroom would serve each typical residential suite (four students). The Residence Hall will have an apartment on the tenth floor for a community director. There will also be approximately 12 student community facilitators. The space for the community director (staff member) does not count as a student bed. The beds occupied by the student community facilitators do count as student beds. Therefore, if built as proposed, this Residence Hall would have 379 undergraduate student beds.

The Residence Hall facades would be red brick and light precast elements, a design vocabulary that has been used on other recent GWU residential buildings. The drawings provided by GWU indicate a front façade that is articulated with bays and with metal awnings and embellishments to add visual interest and provide relationships with adjacent buildings. The overall shape of the front (F Street) façade is essentially square, approximately 89 feet wide and 90 feet high. Within this overall shape, the front façade is articulated to provide a vertical emphasis.

Windows have been added in the west façade to address design concerns expressed by the Commission of Fine Arts. Additional design refinements of the façade are continuing in order to address concerns expressed by the Commission of Fine Arts on December 12.

The Residence Hall will include approximately 1,000 square feet of retail space on the first floor. The application indicates that GWU intends to attract a food-oriented tenant. This would be university space but the retail use would also be open to the public. The Residence Hall, including the first floor retail space, will be serviced from the service yard of the adjacent Support Building (part of the PUD site).

In order to gain the maximum amount of beds in this building, GWU is seeking relief from the rear yard, lot coverage and court requirements through the PUD process, as allowed in Section 2405 of the Zoning Regulations. Small relief is also needed for some of the penthouse setbacks. See the chart below for a summary of the relief requested.

It is useful to note that GWU owns all the property around the proposed residence hall. This includes Francis Scott Key Hall to the east, the Service Building to the west (part of the PUD site) and the property directly north of the Residence Hall Site across the alley. That property fronts on G Street, N.W. In terms of the court relief, GWU needs relief in terms of the zoning regulations, but could also guarantee that any building to the west that may be built in the future over the service building would be set back an appropriate distance.

Zoning Relief Sought

Several elements of zoning relief from the requirements of the R-5-D District are requested in the December 5, 2003 revised Application and Prehearing Statement. These elements are tabulated in Appendix H of that revised Application and Prehearing Statement. These elements are summarized and below and also shown in the zoning matrix.

FAR: The R-5-D District FAR is 3.5 with 4.5 FAR allowed with a PUD. The FAR for this project, calculated on the entire PUD site is indicated as 3.98 FAR. In accordance with the Campus Plan procedure, FAR is aggregated for the entire campus. GWU has indicated to the Office of Planning that

the addition of the 90,000 square of gross floor area for the Square 103 Residence Hall would result in a campus-wide FAR of 2.92.

Building Height: The R-5-D District allows a building height of 90 feet, with the same (90 feet) for a PUD. The Square 103 Residence Hall is 90 feet high. No height relief is necessary.

Lot Occupancy: The R-5-D District allows maximum lot occupancy of 75 percent. In this case, the residence hall and the support building together occupy 77.7 percent of the PUD lot, so a slight zoning relief of 2.77 percent is required. If the Residence Hall were on a separate lot, the lot occupancy would be substantially higher.

Rear Yard: The R-5-D District requires a rear yard of 4 inches of vertical height of the building, but not less than 15 feet (Section 404.1). A 90-foot building would require a rear yard of 30 feet. In this case, GWU is requesting a total waiver of the rear yard requirement. This means there is no rear yard and the residence hall building extends to the edge of the 16-foot alley. GWU has indicated, and shown in the north elevation and floor plans, that the only windows on the back of the building are in a vertical row of windows at the end of the interior hallway. Due to the design of the building, the windows to the student living units are on the sides of the wing of the building, facing the courts.

Courts: The proposed Residence Hall is symmetrical in design with respect to the open courts on the rear sides of the building. The requirement for an open court in the R-5-D District is 3" per foot of height but not less than 10 feet. For a 90-foot building, the requirement is 22 feet, 6 inches. The courts are both 13 feet, 10 inches in width. They therefore exceed the minimum 10 feet but are 8 feet, 8 inches less than the required width. The court on the east side of the proposed Residence Hall adjoins a court of 11 feet, 3 inches at the back of the Francis Scott Key Residence Hall. The court on the west side of the proposed Residence Hall partly adjoins the low, three-story Service Building and partly adjoins the open service yard back of the Service Building.

Penthouse Setback: A penthouse must be set back from the exterior walls of the building a distance equal to the height of the penthouse above the roof and cannot exceed 18 feet, 6 inches in height (Sections 400.7 and 411). The Roof Plan drawing (see Attachment 11) indicates that in almost all areas of the roof, the penthouse is set back 18 feet, 6 inches from the edge of the building. In fact, the setback from the front of the building is 29 feet, 8 inches. However, there are two locations, one on each side of the roof, where the building narrows in back to provide a court on each side. At those points, the distance from the edge of the roof to the penthouse is only 4 feet, 8 inches. This is where zoning relief is needed.

Zoning Matrix: Square 103 GWU Residence Hall PUD December 5, 2003 Submission

ELEMENT	PERMITTED/ REQUIRED R-5-D	R-5-D (PUD MAX.)	PROVIDED R-5-D PUD PROPOSAL	FLEXIBILITY REQUIRED WITH THE PROPOSED R-5-D PUD
FAR	3.5	4.5	3.98 for site *	Note: FAR is aggregated per Campus Plan
Lot Occupancy	75%	75%	77.7% (for entire PUD site)	2.77%for entire site
Building Height	90'	90'	90'	None
Roof Structure Height	18.5 feet max	18.5 feet max	18.5 feet	None
Roof Structure Setback	1:1 Setback	1:1 Setback	18'6"most places, 4'8" in two locations	Reduced setback at two locations, where it is 13' 10" short of the requirement
Rear Yard	4"/ft. height., minimum 15 feet, 30 ' for 90 ' building.	Same, with flexibility.	0'	30 feet
Open Courts	3 in. per foot of height of court, but not less than 10 ft., 22'6"for 90'	Same, with flexibility'	13'-10"	8', 8"

The Amenity Package

GWU outlined an amenity package in the original July 30, 2003 application. In further discussions with the Office of Planning, and as a result of review comments from the Commission of Fine Arts, GWU augmented the amenity package for the November 12 setdown meeting of the Zoning Commission. After the Zoning Commission reduced the height of the building from the proposed 120 feet to 90 feet (the height allowed by the existing R-5-D zoning), thereby reducing the number of beds from 490 to 380 beds (379 student beds), GWU scaled back some elements of the amenity package. The current status of the amenity package, including references to changes, is summarized below.

New Undergraduate Housing on Campus: GWU sees the opportunity to move ahead with undergraduate student housing on this parking lot site, and to provide more housing than could be achieved with the existing R-5-D zoning, as the main amenity of this PUD. Providing more undergraduate student housing on campus is a step toward meeting the condition set by the BZA in the adopted campus plan for the GWU Foggy Bottom Campus that 70 percent of full-time undergraduate students be housed on campus by Fall 2006.

In the initial application in July, GWU proposed 530 undergraduate beds on this site. After the Zoning Commission setdown decision for R-5-D zoning (90 foot height), the revised application calls for 380 beds (379 undergraduate beds).

The Office of Planning was concerned that this PUD housing site might be a substitute for another site identified in the campus plan at the west end of Square 103. In response, GWU has indicated that the housing proposed in this PUD application is in addition to, and not in lieu of, the student housing identified in the "housing opportunity areas" of the 2000 GWU Foggy Bottom Campus Plan. With respect specifically to the housing opportunity site identified at the corner of 21st and F Streets, NW, also on Square 103, the University has committed to pursue the development of housing on that site for

full-time undergraduates as soon as it can acquire the sole remaining parcel it does not own in order to complete the assemblage.

Despite the urging of OP, GWU has declined to make a specific commitment for future student housing on Square 54 (the old GWU Hospital site). GWU believes it is inappropriate to link this residence hall development on Square 103 with future development on the old hospital site. GWU says that decisions have not been made for that site, that development is at least several years away and that a rezoning will be required.

Retail Space on the Ground Floor of the Residence Hall: The initial July 30, 2003 PUD application included approximately 1,000 square feet of retail space on the ground floor of the residence hall for food service. That proposal remains unchanged in the revised application. This would be considered an accessory university use, primarily serving students from the new Square 103 Residence Hall as well as from other nearby residence halls. It would also be open to the public.

Superior Design of the Building: GWU has indicated that superior design of the building would be an amenity and that proposal has remained unchanged. The design framework has changed due to the height of the building being reduced by 30 feet. The shape of the F Street façade is now essentially square. To address the comments of the Commission of Fine Arts, windows have been added on the west elevation of the residence hall. Further refinements are being studied with respect to signs, awnings and embellishment of the projecting bays on the F Street façade.

Streetscape Treatment: Originally, attractive landscaping was indicated as an amenity. The University offered to provide expanded streetscape treatment along the entire north side of F Street from 20th to 21st Street, turning the corner on 20th Street and extending north to G Street, and north on 21st Street including the streetscape improvements on the side of the Quigley Building. The University indicated they would work with non-university property owners to achieve coordinated streetscape. After the building height was reduced, reducing the number of beds, GWU scaled back the streetscape commitment.

The present streetscape proposal from GWU is to continue and fill in the existing streetscape treatment along F Street in front of the new Residence Hall. There would be a low brick wall capped with pre-cast similar to the wall along the street side of the Support Building. The brick color and detailing would match the proposed design of the new building but retain the same height as the wall in front of the Support Building. The low wall treatment would be related to the area in front of Francis Scott Key Hall (east of the new Residence Hall). The aim would be to create a transition within the streetscape between the new building and FSK with brick paving where appropriate, cheek walls to match the low brick wall at the sidewalk, light fixtures compatible with those used at the Law School on the west side of 20th Street between G and H Streets, and to replace, renovate or repair, as appropriate, the landscape material at the George Washington bust as 20th and F Streets.

Renovation of Quigley's for Food Service: Early in the discussions, GWU amended the amenity package to include the addition of 7,500 square feet of public retail space in the former "Quigley's" building for expanded food service at the northwest corner of Square 103 (SE corner of 21st and G streets, N.W.). The "Quigley's" building has long been seen as a kind of special building in the campus and in the community. The facility will be a university use but it will be open to the public. The plans for the renovation and expansion of this building will have to go through the normal campus plan further processing procedure. GWU has indicated that they will commit to filing an application with the Zoning

Commission for this building before the occupancy permit is sought for the proposed Square 103 Residence Hall.

Sustainable Design: After the initial application, and at the suggestion of OP, GWU stated its intent to utilize sustainable design practices to construct an environmentally responsible building. The concept design of the original building and engineering systems were evaluated using the Green Building Rating System ™ by GWU architect's LEED™ Accredited Professional on staff. The accredited professional determined that it was feasible to obtain the basic LEED ™ certification.

After the Zoning Commission setdown decision, GWU has somewhat scaled back the commitment for sustainable design. GWU still indicates that it will design and construct the Square 103 Residence Hall in an environmentally sensitive manner and has outlined a number of specific elements of that approach. However, the commitment to go far enough to obtain the basic LEED ™ certification has been withdrawn.

In summary, GWU still offers a number of amenity package elements. GWU asserts that their major amenity is the commitment to build additional undergraduate housing on campus at this location.

IV. PLAN RELATIONSHIPS

The Comprehensive Plan

The subject site is in an area north of F Street designated "institutional" on the District of Columbia Generalized Land Use Map (see Attachment 2). The institutional land use category includes land and facilities occupied by colleges, universities, schools, hospitals, religious institutions and similar facilities as the predominant uses. The area on the south side of F Street is designated Residential High Density and the area east of 20th Street is indicted as Commercial High Density.

The Office of Planning has stressed the importance of Comprehensive Plan policies in its reports to the Board of Zoning Adjustment on the George Washington University Campus Plan. The Office of Planning's summary of relevant Comprehensive Plan policies from OP's April 21, 2000 report to the BZA is repeated below (italicized for identification).

> *The Comprehensive Plan, especially the Ward 2 Plan, contains a number of references directly or indirectly to George Washington University and the Foggy Bottom and West End neighborhoods. Sec. 102 in Chapter 1 includes general references to improving neighborhoods, and also mentions the role of institutions in neighborhoods. Chapter 2, Economic Development, includes a number of sections relating to economic development actions, including interaction between universities and the business community (Sec. 203.2(d).*
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> *Sec. 1303.7 of the Ward 2 Plan is descriptive, noting that institutional growth and other factors have lessened the amount of housing available in the Foggy Bottom and West End neighborhoods. Sec. 1305.1(j) calls for adjustments to the zoning regulations and to campus plans to address the problems of loss of housing from different factors, including university dormitories. Sec. 1309.11 cites parking problems resulting from student parking. Sec. 1342.1(b) calls for the George Washington University campus plan to plan for future dormitories. Sec. 1358 of the Ward 2 Plan on George Washington University is the most specific:*

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

Section 2403.4 of the Zoning Regulations provides that the Zoning Commission shall find that the proposed PUD is not inconsistent with the Comprehensive Plan. OP believes that GWU's proposal to construct a new residence hall on Square103 is not inconsistent with the policies in the Comprehensive Plan to construct new dormitories on campus.

SNAP PROCESS–CLUSTER 5

The Strategic Neighborhood Action Plan (SNAP) planning process identified near-term goals for individual neighborhood clusters. The George Washington University is part of Cluster 5, within the boundaries of Rock Creek Park and O Street on the North; 21st Street, New Hampshire Avenue, Pennsylvania Avenue, and 19th Street on the East; E and F streets on the South; and Rock Creek Park on the West. Cluster workshop participants were asked to identify priorities for additional action planning. The following priorities were identified in that process:

- Expansion of GWU (*the problem*), More Student Housing on Campus, and Improved GWU/Community Relations
- Traffic and Parking
- Balance Between Residential, Commercial, University, and Institutional Uses.

This PUD proposal appears to address the priorities indicated above.

GWU Campus Plan

Related features of the *George Washington University Foggy Bottom Campus Plan: Years 2000 through 2009* have been discussed in a previous section.

V. ANALYSIS

Chapter 24 of the Zoning Regulations, **Planned Unit Development Procedures**, outlines the procedures for planned unit developments. The first two subsections outline the purpose and goal of the planned unit development process:

2400.1 The planned unit development (PUD) process is designed to encourage high quality developments that provide public benefits.

2400.2 The overall goal is to permit flexibility of development and other incentives, such as increased building heights and density, provided, that the project offers a commendable number or quality of public benefits and that it protects and advances the public health, safety, welfare, and convenience.

Subsection 2400.4 deals with some limitations on the process.

2400.3 While providing for greater flexibility in planning and design than may be possible under conventional zoning procedures, the PUD process shall not be used to circumvent the intent and purposes of the Zoning Regulations, or to result in action that is inconsistent with the Comprehensive Plan.

OP is pleased to see this proposal for a new residence hall that will move the GWU toward meeting the requirements in the BZA Order for at least 5,600 beds for full-time undergraduate students on campus by the fall of 2006. Achieving the number of student beds being sought (379) in this residence hall will require some flexibility as part of the PUD process as previously outlined.

Zoning Relief

Lot Occupancy: The increased lot occupancy is small, 77.7 percent versus 75 percent allowed, or 2.7 percent more than allowed. OP recognizes that this small difference is obtained in part because of the total PUD site area being counted. OP recommends that this flexibility be approved as part of the PUD application, but that the order specifically note that his lot may not be resubdivided.

Rear Yard: GWU is requesting a total waiver of the rear yard requirement (30 feet with a 90-foot building. This means there is no rear yard and the residence hall building extends to the 16-foot alley. This is the major zoning flexibility being sought in the design of the building. Providing a rear yard would essentially eliminate the approximately 100 additional beds that GWU seeks to obtain on this site. OP recommends that this rear yard flexibility be granted. OP notes that GWU owns the property on the north side of the alley. Construction of a new building, probably encompassing several properties, will take place at some future time and will be processed in accordance with the campus plan. OP notes that GWU could design a future building on that site to relate the design of the Residence Hall.

Courts: The courts are 13 feet, 10 inches in width, or 8 feet, 8 inches less than the required width of 22 feet, 6 inches. These court sizes result from the need to design adequate student living units on both sites of the hallway in the back wing of the building. OP recommends that the court flexibility be granted as a part of the PUD application. OP notes that the court on the west side of the proposed Residence Hall partly adjoins the low, three-story Service Building and partly adjoins the open service yard back of the Service Building, and that building and that space are part of the overall PUD site. GWU has indicated that, at some future time, there may be additional construction over the service yard. That would require a PUD modification. OP recommends that this PUD approval include a provision that any future building to the west of the Residence Hall be set back an appropriate distance so as to provide at least the full court width on the west side. The Francis Scott Key Hall Residence Hall to the east of the new Residence Hall will likely remain for some years. However, if it is replaced, the design of a new building could also relate to the Residence Hall in terms of courts.

Penthouse Setback: The penthouse meets or exceeds the requirement for a setback of 18 feet, 6 inches from the exterior walls of the building at most points. The penthouse is set back 29' 8" from the front of the building. There are two locations, one on each side of the roof, where the building narrows in back to provide a court on each side. At these points, the distance from the edge of the roof to the penthouse is only 4 feet, 8 inches and zoning relief is needed. OP recommends that this penthouse flexibility for these locations be granted as part of the PUD application. This close distance is limited in scope and it does not appear that this setback issue will generally be perceptible from the street (see attachments 7, 10 and 11), in view of the larger setback of the penthouse from the front of the building.

Amenity Package

The discussions and changes to the amenity package have been discussed above. OP analysis is noted below.

New Undergraduate Housing on Campus: The benefits of providing new undergraduate housing on campus, recognizing that it is required by the approved campus plan, can be read in different ways. OP recognizes that additional housing is required by the campus plan and sees providing additional undergraduate housing as a positive step. GWU sees the opportunity to move ahead with undergraduate student housing on this parking lot site, and to provide more housing than could be achieved with the existing R-5-D zoning, as the their main amenity of this PUD. OP believes that providing the additional student beds in this project (approximately 100 additional beds with the PUD flexibility) within the GWU campus is a benefit for the project itself and for the goal of providing more undergraduate housing on campus. OP understands that other locations may be more agreeable to the community. However, this is a site where undergraduate housing on campus can move forward now. Providing more undergraduate student housing on campus is a step toward meeting the condition set by the BZA in the adopted campus plan for the GWU Foggy Bottom Campus that 70 percent of full-time undergraduate students be housed on campus by Fall 2006. In summary, OP believes providing this additional housing on this site is a benefit. However, as a general policy we do not consider the construction of housing in a zone where it is required, especially in response to a Campus Plan requirement, to be a superior benefit.

Despite the urging of OP, GWU has declined to make a specific commitment for future student housing on Square 54 (the old GWU Hospital site). GWU believes it is inappropriate to link this residence hall development on Square 103 with future development on the old hospital site. GWU says that decisions have not been made for that site, that development is at least several years away and that a rezoning will be required.

Retail Space on the Ground Floor of the Residence Hall: OP believes that provision of 1,000 square feet of retail space for food service on the ground floor of the is an amenity for the project, serving the students in the Residence Hall and in nearby residence halls and by being open to the public, may serve as an amenity to some members of the adjacent community.

Superior Design of the Building: OP believes that having an attractive new building at a location that is now a parking lot is an amenity. The design of the building indicates an attractive and interesting façade on F Street, and the articulation of the façade will add interest to this section of F Street and be compatible with the Francis Scott Key Residence Hall to the east. The building is subject to review by the Commission of Fine Arts. While this amenity may not rise to the superior level, it is clearly an improvement over the existing parking lot.

Streetscape Treatment: OP believes that the streetscape improvements now proposed by GWU, although reduced from the original commitment, are a step in the continuing effort to improve the streetscape throughout the campus. These improvements primarily provide a setting for the Residence Hall but also contribute to the larger sense of place for this block. OP understands that streetscape improvements will also be done in conjunction with the renovation of Quigley's for food service (see below).

Renovation of Quigley's for Food Service: OP believes the renovation and expansion of the Quigley's building for food service is an amenity for the larger GWU student/staff community (not just the Square 103 Residence Hall residents) and, to some lesser extent, for the adjacent Foggy Bottom community. It will also help retain and make use of this special building. OP recognizes that this improvement would probably be done at some future time anyway. However, in effect, moving it up in timing is another step in increasing the retail presence and street activity of the GWU campus.

Sustainable Design: GWU still indicates that it will design and construct the Square 103 Residence Hall in an environmentally sensitive manner and has outlined a number of specific elements of that approach. However, the commitment to go far enough to obtain the basic LEED ™ certification has been withdrawn. OP regrets that GWU has somewhat reduced its commitment to sustainable design but feels that obtaining an increased level of effort for sustainable design is a good step that provides some amenity. Small steps toward sustainable design, which must be done building by building, eventually produce benefits not only for an individual building but also for the larger community.

Overall, OP recommends that the proposed amenity package be approved. OP believes that this Residence Hall is another step toward carrying out the campus plan. In that respect, continued effort is necessary in the future to address the overall development of Square 103 in more detail. Some additional steps have been suggested above.

Other Impacts

In deciding a PUD, the Commission shall judge, balance and reconcile the project amenities and public benefits and any potential adverse impacts. In this application, concerns have been raised about adding additional students at this site above a matter-of-right building (approximately 79 beds are gained by the zoning flexibility requested), about the use of the adjacent service yard (part of the PUD site) to provide the loading for the building rather than a separate loading space, and the impacts during period when students move in and out of the Residence Hall. OP has addressed adding additional students elsewhere in this report. Using the adjacent service yard, back of the service building, provides service access to the Residence Hall through a side gate and a service ramp. Some scheduling of the use of the service yard may be necessary.

OP had raised the issue of impacts during student move-in and move-out periods with GWU. The University has indicated that these move periods receive considerable coordination with the University Police and the Metropolitan Police Department to address impacts. Procedures now used with other residence halls would be used with this residence hall when completed. GWU indicates that, considering the number of students moving in or moving out, the system GWU has established in cooperation with District officials has in general worked well.

VI. AGENCY AND COMMUNITY REVIEWS

Advisory Neighborhood Commission Review

The revised proposal for the GWU Square 103 Residence Hall was referred to Advisory Neighborhood Commission 2-A. The proposal was discussed at the regular ANC-2A meeting on January 21 with further consideration at a special ANC –2A meeting on January 27, 2004 at which a proposed resolution was discussed. The four-page resolution raises a number of issues concerning the use of the PUD in conjunction with a campus plan. ANC 2-A then passed the resolution (#04-1D) by a vote of 3-1, one commissioner absent. The last page of the resolution in effect provides a summary of the entire resolution, and reads as follows:

"ANC-2A:

> Opposes the use of the PUD zoning tool within the Campus Plan boundaries for the proposed residence hall (or any other development) as an inappropriate and unneeded tool for Campus Plan development;
>
> Opposes most of the variances for relief from the Zoning requirements as unwarranted;
>
> Opposes the lack of a dedicated off-street loading area;
>
> Opposes the inclusion of a publicly-accessible, ground-floor retail tenant in the proposed residence hall; and
>
> Finds that the proposed amenities and benefits to the Foggy Bottom community and the District as a whole are essentially nil.

Therefore, ANC-2A recommends that the Zoning Commission reject the proposed PUD residence hall development."

Commission of Fine Arts Review

The site of the proposed university residence hall is on the border of the area where design review by the U.S. Commission of Fine Arts is required by the Shipstead-Luce Act. George Washington University went to the Commission of Fine Arts for a concept design review at the July 17, 2003 meeting of the Commission. Commission members raised some questions about the additional height (gained by the PUD and related rezoning) and suggested that the University return with more definitive presentation materials, such as a massing model including neighboring buildings. The Commission also asked for additional investigation of the west elevation of the building (July 24, 2003 letter to Michelle Honey, GWU).

The University returned to the Commission of Fine Arts on Thursday, October 16. At this meeting the University and its architects, Ayers Saint Gross Architects, presented a revised design with the top two floors set back and some revision to the design of the F Street façade. The Commission of Fine Arts discussed the height and façade design issues at some length, and generally agreed to a higher building provided there are design improvements in the façade. The advice of the Commission of Fine Arts was outlined in an October 24 letter from Donald A. Capoccia, Vice Chairman, to Michelle Honey, GWU).

After the Zoning Commission decided (on November 12, 2003) to set down the PUD at R-5-D zoning (90 foot height), the University returned to the Commission of Fine Arts on December 18, 2003, with a revised design of the building at 90 feet. Commission members reviewed the revised design. The advice of the Commission of Fine Arts was as follows (December 23 letter from Charles H. Atherton, Secretary, to Michelle Honey, GWU):

> During its meeting of 18 December, the Commission reviewed the proposed concept for a George Washington University residence hall to be located at 2025 F Street (S.L. 03-116). Although there was not a quorum enabling an official action, the members present have given conceptual approval for confirmation at the next meeting. The prominent side elevation requires further investigation and development as the project proceeds. In addition, special care should also be taken in the development of the signs, awnings and embellishment of the projecting bays, as they are the primary decorative elements of the design.

This advice was confirmed as an official action at the Commission of Fine Art's meeting on January 15, 2004. If the Zoning Commission approves the PUD, George Washington University plans to return to the Commission of Fine Arts for final approval as part of the permit process.

Agency Review and Comment

The Office of Planning referred the application to various District agencies and the Office of Zoning referred the application to the District Department of Transportation (DDOT). A DDOT report is expected. As part of this review, WASA indicated the information it will need to review the hydraulic loading this project will place upon the water distribution and combined sewer systems. OP has forwarded that information to GWU. The Metropolitan Police Department (MPD) indicated that the proposal seems like a reasonable approach to consolidate student housing. MPD noted the lack of a formal loading dock (loading is through the adjacent service yard) and expressed concern about deliveries impacting traffic on F Street.

VII. RECOMMENDATION

This application for a PUD for the Square 103 Residence Hall would provide a significant amount of new student housing on the George Washington University campus. It provides approximately 100 beds more than a student housing project on the site meeting all the R-5-D zoning requirements. As noted above, there is a need for flexibility to achieve these additional beds. The amenity package offers some benefits but has been scaled back from the original proposal. Balancing these various aspects of flexibility and benefits, **OP recommends that the PUD be approved in order to proceed with additional undergraduate housing at this site.**

In recommending approval of the proposed Residence Hall PUD, OP also notes that GWU needs to continue to pursue other opportunities for providing student housing on the GWU campus. OP is pleased to see that GWU has confirmed its intent to construct additional student housing on the site at the west end of Square 103, as indicated in the campus plan. OP continues to believe that other housing sites should be pursued, including a site on Square 80, and some student housing on Square 54 (the old GWU Hospital site).

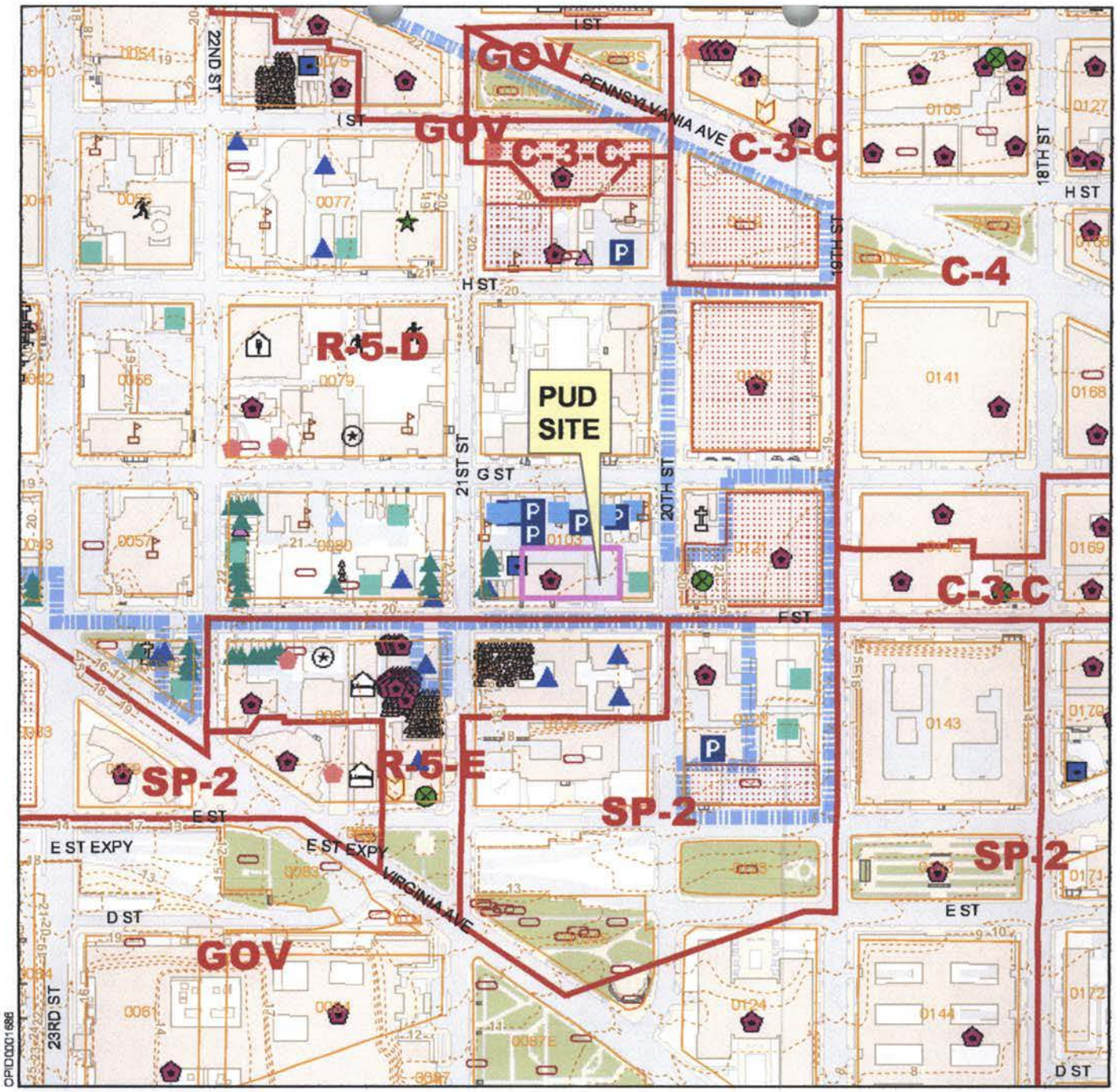
In addition, moving ahead with this project and the renovation and expansion of Quigley's, and eventually the new housing development at the west end of Square 103, will further the overall development framework for Square 103. As that happens, additional planning should be pursued for future development on other Square 103 sites and for additional coordinated streetscape development.

ATTACHMENTS:

1. Zoning and Land Use Map
2. Comprehensive Plan General Land Use Map
3. Aerial Photo
4. Aerial Oblique – Looking South
5. Aerial Oblique – Looking North
6. F Street Elevation (South Elevation of Building)
7. 3D Model View Showing West Elevation of Building
8. Existing View and Photomontage Looking East on F Street
9. Typical Floor Plan (Floors 4-9)
10. 3D Model View Showing Penthouse
11. Roof Plan

Attachments 6-11 are from GWU.

AA/jf



Zoning and Land Use
Zoning Commission Case No. 03-29

N

Feet

0 250 500

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Note: Land Use Info based on OTR records.

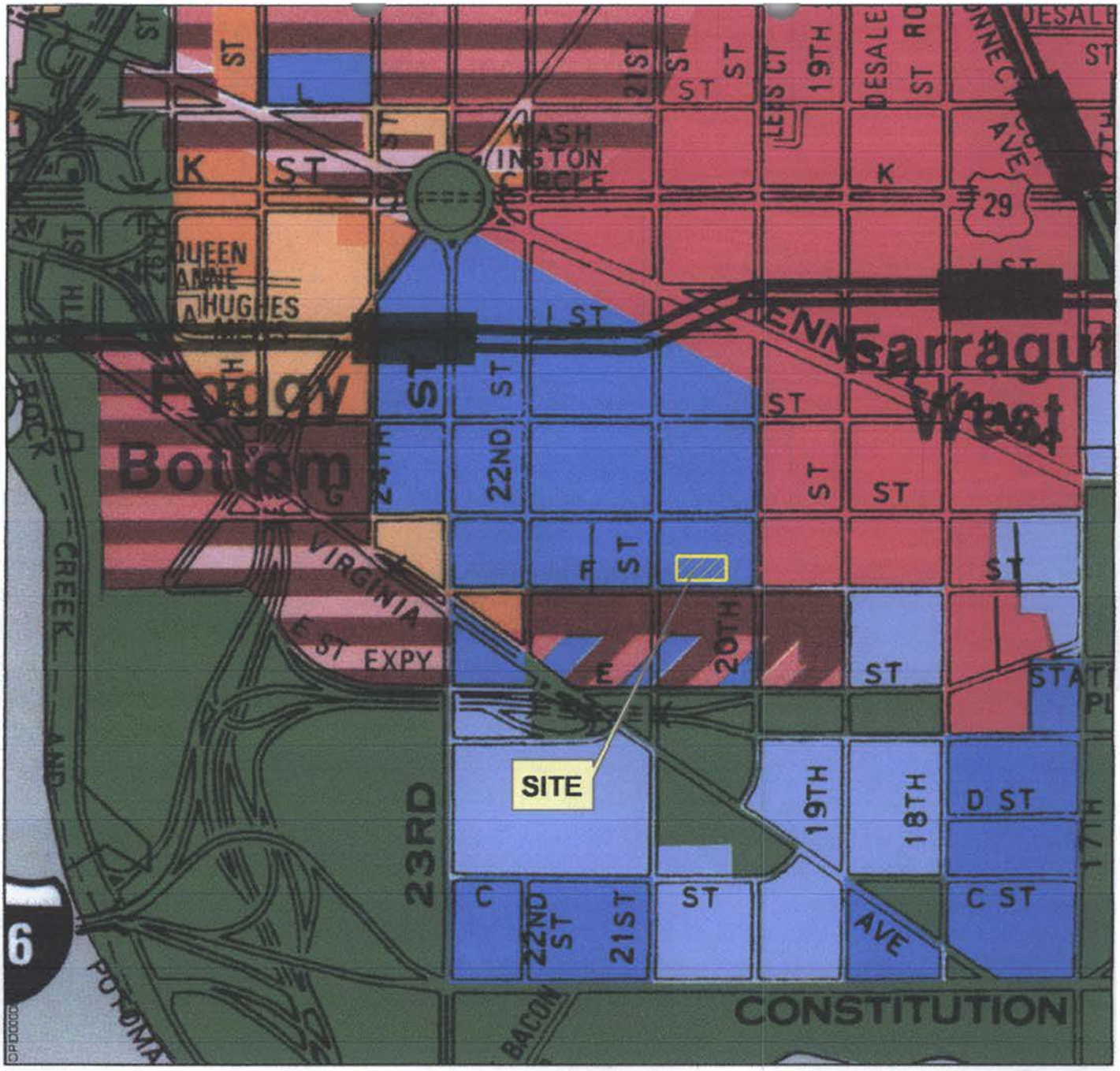
Legend

- Zoning
- PUDs
- Property Squares
- Campus Boundary
- Elevation Contours - 1m
- Buildings
- Sidewalks
- Roads
- Parks

Land Use Legend

- Row house
- Club-Private
- Theater
- Hotel
- Resid. - Transient
- Fraternity/Sorority
- Dormitory
- Condo
- Non-conforming use
- Multi-family Dwelling
- Office
- Retail
- Parking Garage/Lot
- Religious
- Educational
- Embassy, Chancery
- Museum, Library
- Recreational
- Public Service
- Special Purpose
- Vacant

Attachment 1



Comprehensive Plan Generalized Land Use Map
Zoning Commission Case No. 03-29
(Map as adopted 1998)

N

Feet

0 500 1,000

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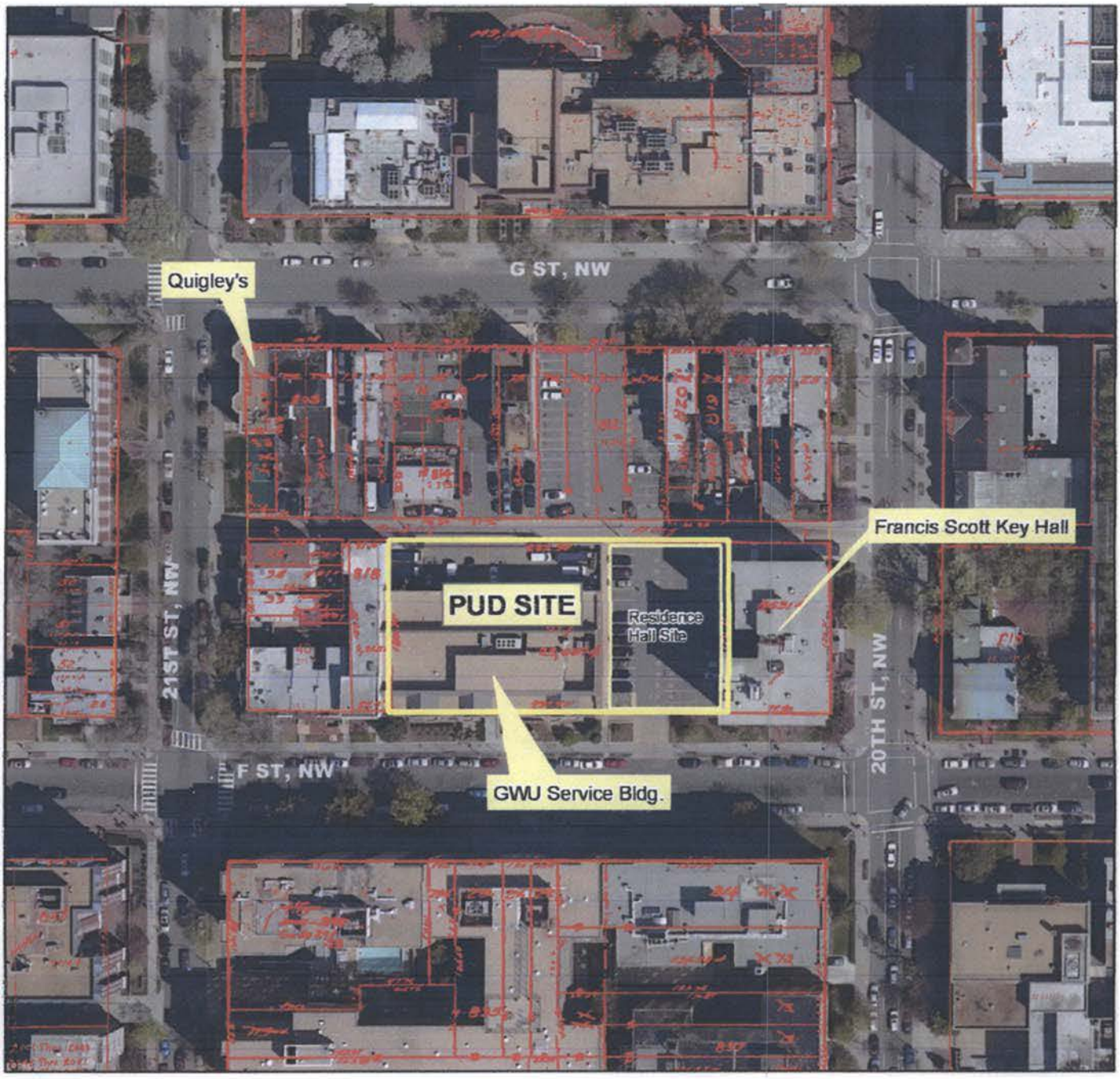
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Generalized Land Use Key

- Residential Low Density
- Residential Moderate Density
- Residential Medium Density
- Residential High Density
- Water
- Commercial Low Density
- Commercial Moderate Density
- Commercial Medium Density
- Commercial Med.-high Density
- Commercial High Density
- Federal
- Institutional
- Local Public
- Parks, Recreation and Open Space
- Production and Technical Employment



Attachment 2



Aerial Photo
Zoning Commission Case No. 03-29

N

Feet

0 50 100 150

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Attachment 3



Aerial Oblique Photo
Looking South
Zoning Commission Case No. 03-29

N

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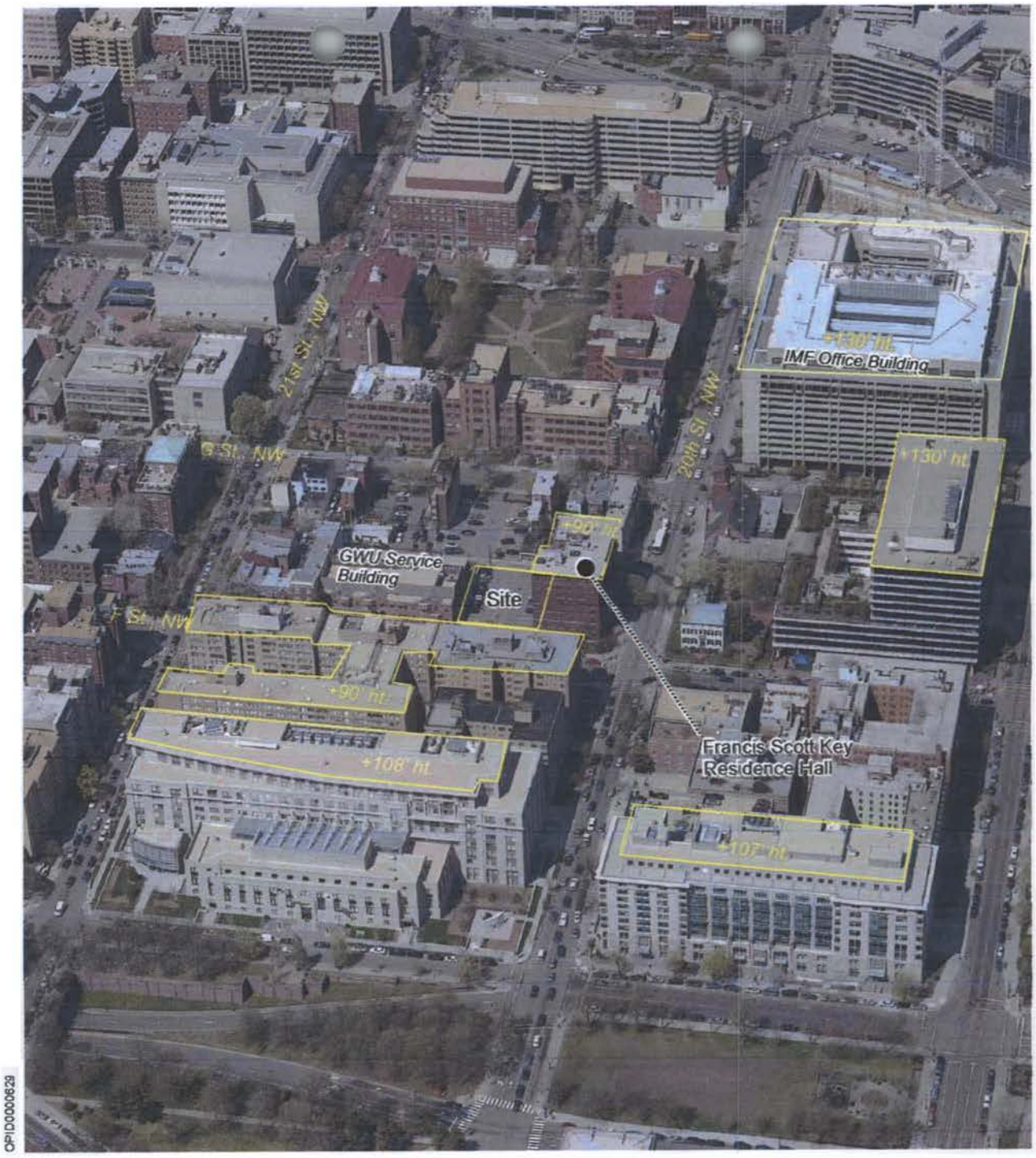
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Approximate Mass of Proposed Building



Attachment 4



Aerial Oblique Photo
Looking North
Zoning Commission Case No. 03-29

N

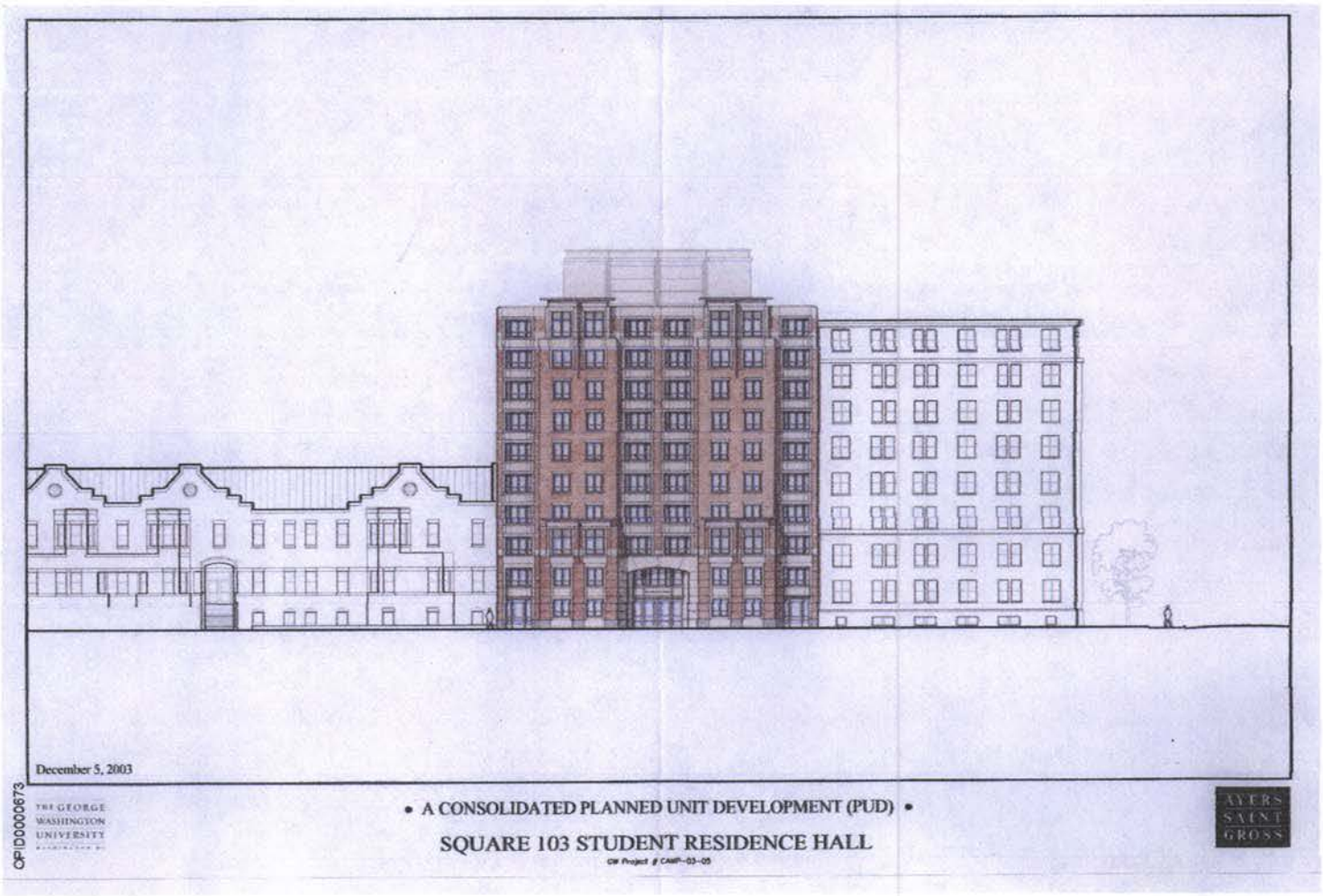


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Attachment 5



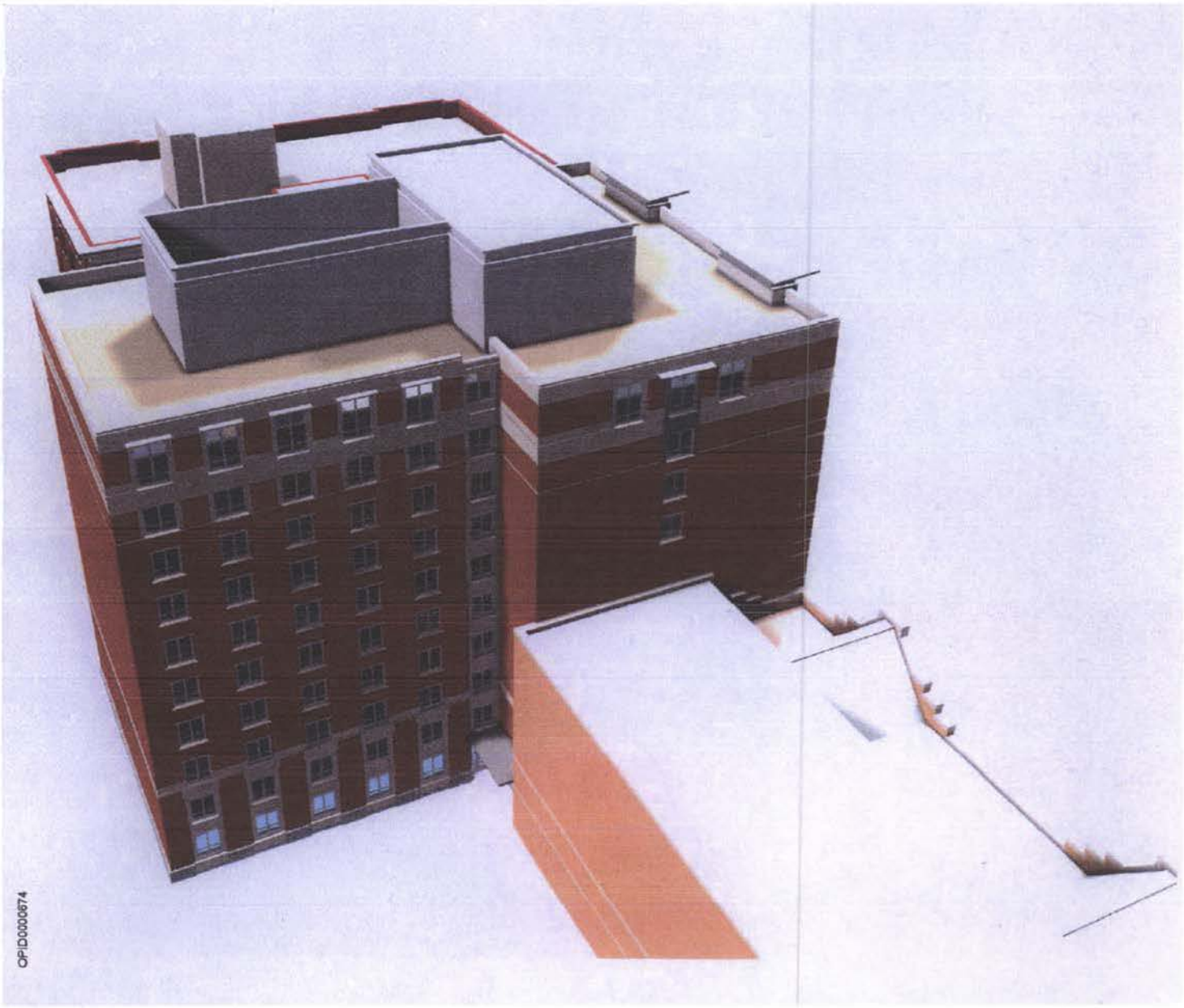
Front Elevation (F Street)
Zoning Commission Case No. 03-29

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The information provided is a reproduction of portions of drawings submitted to the Office of Zoning by Ayers-Saint-Gross for The George Washington University and dated December 5, 2003.

Attachment 6



3D Model View Showing West Elevation of Building
Zoning Commission Case No. 03-29

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The information provided is a reproduction of portions of drawings submitted to the Commission of Fine Arts by Ayers-Saint-Gross for The George Washington University and dated December 18, 2003.

Attachment 7



Office of Planning Photo Looking East
January 30, 2004



Photomontage Looking East
Zoning Commission Case No. 03-29

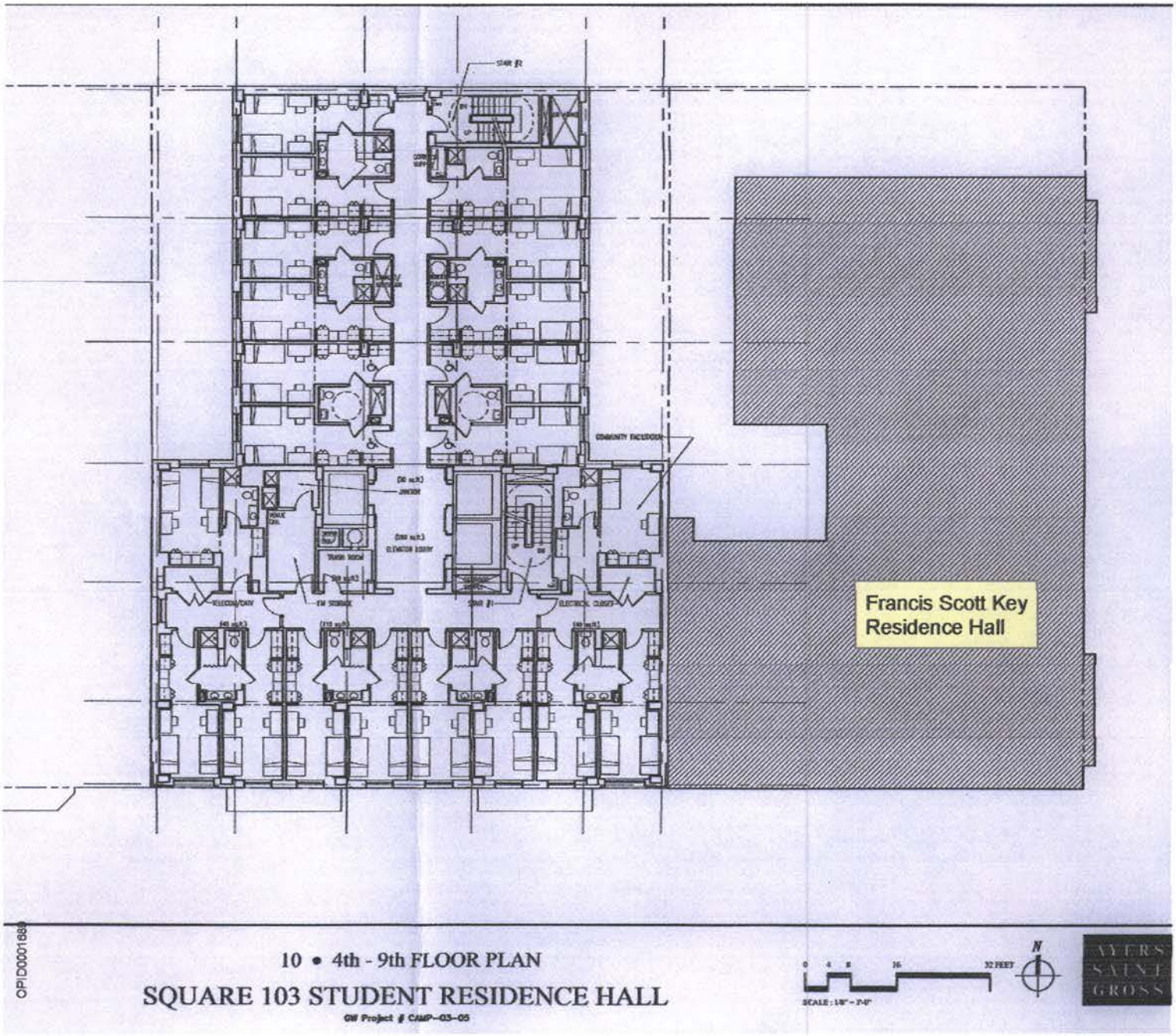
OPIDO000676

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Attachment 8



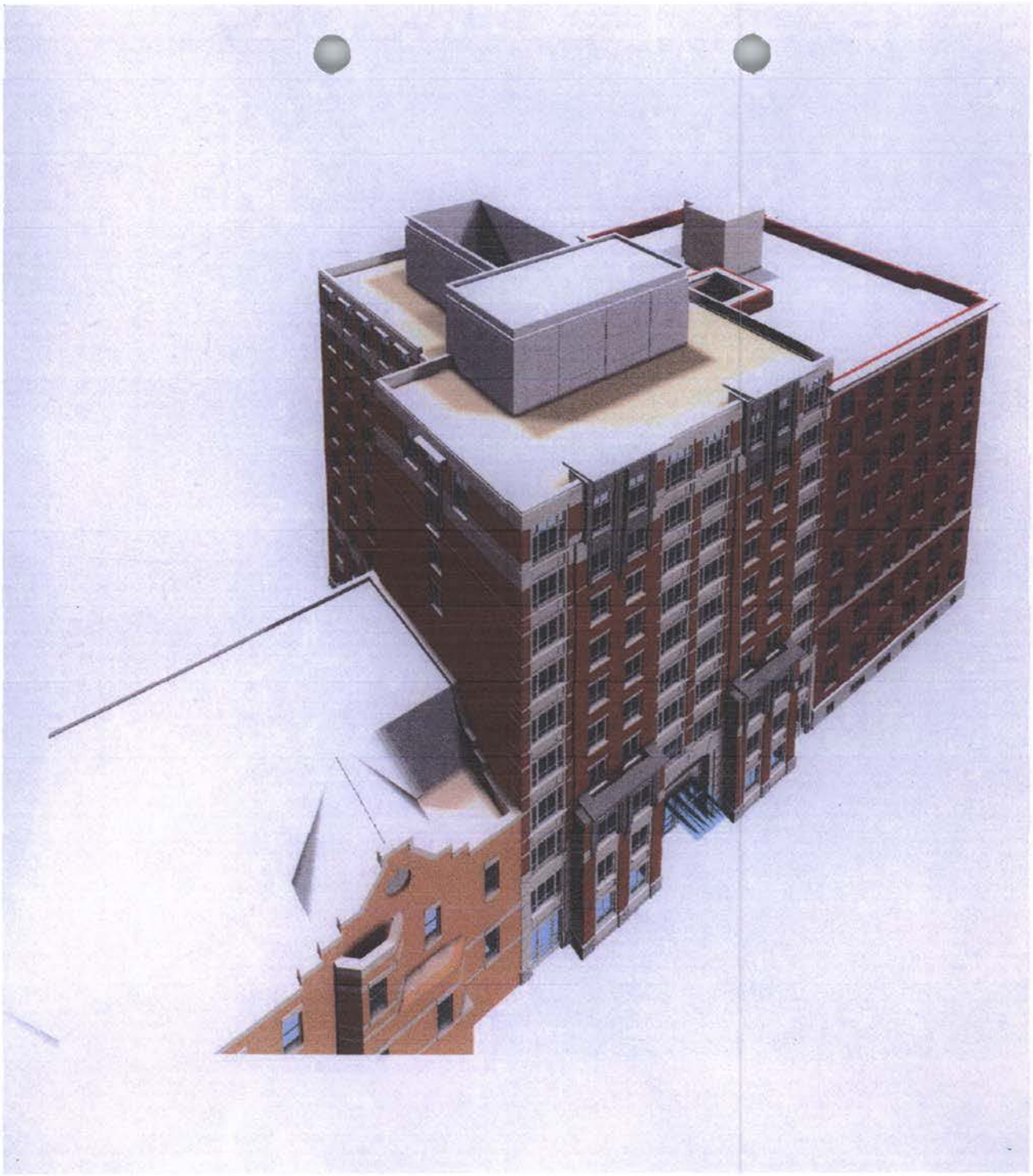
Typical Floor Plan (Floors 4-9)
Zoning Commission Case No. 03-29

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The information provided is a reproduction of portions of drawings submitted to the Commission of Fine Arts by Ayers-Saint-Gross for The George Washington University and dated December 18, 2003.

Attachment 9



OPID0001690

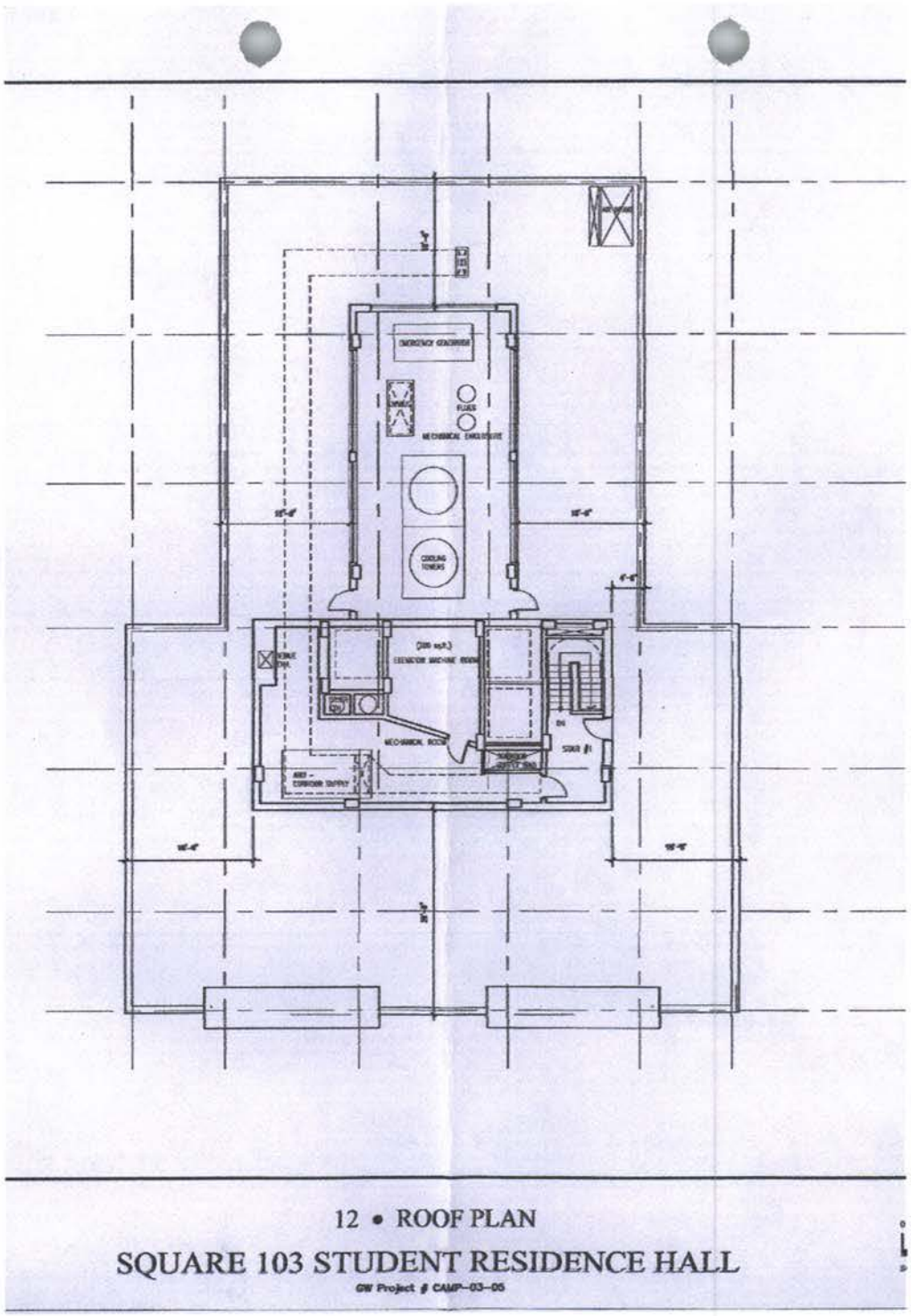
3D Model View Showing Penthouse
Zoning Commission Case No. 03-29

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Attachment 10



OPID0001639

Roof Plan
Zoning Commission Case No. 03-29

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Attachment 11