The COMMITTEE of 100 on the FEDERAL CITY
founded 1923

1317 G Street, N.W. Washington, D. C. 20037

February 19, 2004

Ms. Carol Mitten, Chair
Zoning Commission
One Judiciary Square
Washington, D. C. 20001

Madam Chair:

Re: Case 03-29 - PUD in GWU Campus Plan

The Committee of 100 on the Federal City wishes to express its deepest concern about the introduction of PUDs into campus plans. To do so is to combine two separate zoning processes with conflicting purposes, undermining the protections intended to be provided to communities that abut universities and like institutions.

The Zoning Regulations deal directly with campus impacts. Where an institution is located in a more restrictive zone, it must bear the burden of proving that it is not likely to become objectionable to neighboring property because of noise, traffic, number of students, or other objectionable conditions"in order to obtain a special exception.

PUDs are instruments for relieving zoning restrictions to permit otherwise impermissible construction and development. Utilizing them within campus plans undermines the integrity of the campus planning process, permitting excessive density. It removes the further protection of tests normally available when considering variances.

Further, the present applicant is seeking PUD status by claiming to offer amenities that are, in fact, zoning requirements of its campus plan! GWU is required under law to provide significant new amounts of student housing, and the institution has extensive property holdings within the campus boundaries (and elsewhere) on which it can provide that housing. Shoehorning the described project on this small site is unnecessary, especially when its consequence is a precedent for weakening campus plan zoning.

The other "amenities" are meager; for instance, the architecture is hardly superior (precast elements are no mark of superior design, as other buildings on the campus make clear). Restoring the streetscape after construction is not a justification for the precedent-setting establishment of grounds for PUDs in campus plans.

We ask the Commission to deny this application. To grant it would clearly "circumvent the intent and purposes of the Zoning Regulations" (§ 2400.3).

Sincerely,

Barbara Zartman

ZONING COMMISSION
District of Columbia
Case 03-29
Exhibit 37

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202-628-8030 202--628-8031 (fax)

Email: TheComm100@aol.com Website: http://www.committeeof100.net

ZONING COMMISSION
District of Columbia
CASE NO.03-29
EXHIBIT NO.37