



THE GEORGE
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UNIVERSITY
WASHINGTON DC

April 24, 2006

Ms. Sharon Schellin
Acting Secretary to the Zoning Commission
Office of Zoning
441 Fourth Street, NW
Suite 200 South
Washington, DC 20001

Re: Comments on Proposed Text Amendments on Inclusionary Zoning
ZC Case No. 04-33

Dear Ms. Schellin:

The George Washington University hereby submits the following comments to the above-referenced proposed Text Amendments on Inclusionary Zoning.

Section 2602.3 of the proposed text exempts certain residential facilities from the application of the inclusionary zoning program, including "dormitories". While the University supports this exclusion, we believe that it should be broadened to include "university housing". "University housing" would be defined to mean "housing developed by, or on behalf of, a local college or university for its students, faculty or staff."

Our first concern is centered on the fact that "dormitories" is not broad enough to include all housing occupied entirely by students. "Dormitory" is not defined under the Zoning Regulations and the dictionary definition (to which the regulations refer) is not broad enough to include apartment-style facilities, owned and operated by a university, housing only its students. The use of "university housing" avoids this problem by exempting residential facilities that are limited to the university population.

Our second concern is that "dormitories" would not include housing containing only GW faculty and staff. While GW has no employee housing at this time, for the past year the University has been engaged in a study to create such housing. There is significant interest by our faculty and staff in the possibility of living close to the Foggy Bottom campus. GW is currently examining the Hall on Virginia Avenue, the former Howard Johnson's motel, as a possible site for such housing since, pursuant to the commitments recently set forth in connection with GW's pending Foggy Bottom Campus Plan case, this facility will not be used to house undergraduates after August 2006. As the University transitions undergraduate students out of that particular residence hall, we are considering whether this site can be developed for housing GW faculty and staff.

ZONING COMMISSION
District of Columbia
CASE NO. 04-33
EXHIBIT NO. 190

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Any University proposal to develop housing for faculty and staff should not, however, be subject to the inclusionary zoning program. Such housing would serve a specialized, restricted population and thus need not serve the same interests as a facility intended for the general community. In addition, while GW would likely provide any housing it develops for its employees below market rates, the University should not be forced to comply with the highly restricted provisions of the inclusionary zoning program intended for the general population. GW faculty and staff have incomes and needs distinct from the general population which would make the inclusionary zoning program inapplicable. Any attempt to force university housing into the inclusionary zoning mold would undercut the University's efforts to provide more District housing for its working population.

Accordingly, we request that the Commission expand the scope of the exclusions in Section 2602.3 to include "university housing", as defined above, so that such housing would not be covered by the inclusionary zoning proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Katz", with a long horizontal stroke extending to the right.

Louis H. Katz
Executive Vice President and Treasurer