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October 24, 2005

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Ms Sharon Schellin
Secretary to the Zoning Commission
441 4th Street, Room 210
Washington, DC 20001

Re: Z.C. Case No. 05-27 - American University Special Exception Application for Further Processing of an Approved Campus Plan – Proposed SIS Building Pre-Hearing Statement of the Applicant

Dear Ms Schellin

Enclosed please find the pre-hearing statement of American University for the proposed School of International Service ("SIS") building located along Nebraska Avenue on the main campus This case is scheduled for a public hearing on Monday, November 7, 2005

If you have any questions, please do not hesitate to contact the undersigned

Sincerely yours,

Paul A. Tummonds, Jr

Enclosures

cc Jorge Abud/Hisham Khalid/David Taylor
Sarah Shapley, ANC 3D
Alma Gates, ANC 3D
Hugh Mullane, ANC 3D
Steven Mordfin, OP
Abdoulaye Bah, DDOT
Sharlene Reed, DDOT

ZONING COMMISSION
District of Columbia
CASE NO. 05-27
EXHIBIT NO. 17

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ZONING COMMISSION
District of Columbia
CASE NO.05-27
EXHIBIT NO.17

BEFORE THE ZONING COMMISSION
OF THE DISTRICT OF COLUMBIA

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Application of the American University	**Z.C. Case No. 05-27** **ANC 3D**
Campus Plan Further Processing Application for Construction of the New School of International Service ("SIS") Building	**Public Hearing: November 7, 2005**

PREHEARING STATEMENT OF THE APPLICANT

NATURE OF RELIEF SOUGHT

Pursuant to 11 DCMR §3104 and in accordance with §210 of the Zoning Regulations, American University (hereinafter "**AU**" or "**Applicant**") requests special exception approval for the further processing of an approved Campus Plan to permit the construction of the new School of International Service ("**SIS**") building The proposed new SIS building will be located on AU's main campus along Nebraska Avenue on a portion of the campus that is presently used as a surface parking lot. No variances are requested in this application, and the requested special exception relief fully meets the requirements of the Zoning Regulations.

HISTORY AND STATUS OF THE CAMPUS PLAN

AU submitted its proposed Campus Plan for the period 2000 through 2011 (the "**Campus Plan**") to the DC Board of Zoning Adjustment on August 24, 2000. Thereafter, responsibility for the review and approval of campus plans and further processing applications was transferred to the DC Zoning Commission ("**Commission**"). The Zoning Commission approved the Campus Plan and three further processing applications (the construction of the Katzen Arts Center, an addition to the Mary Graydon Center, and the enclosure of the campus road under

Butler Pavilion) on January 8, 2002 pursuant to Z.C. Order No. 949. On April 30, 2002, the Zoning Commission issued Order No. 949-A which restated the Commission's intent that the bleacher seats approved in the Campus Plan were to face the athletic fields, and adopted a new condition of approval that included certain commitments of AU that were offered during the public hearing process that were not included in Order No. 949.

Subsequently, the Commission's approval of the Campus Plan was appealed to the DC Court of Appeals The Court of Appeals upheld the Commission's approval of the Campus Plan as rational, supported by substantial evidence in the record, and compliant with legal requirements in all but one respect. The Court of Appeals remanded the case to allow the Commission to articulate with particularity its reasons for declining to follow the recommendation of ANC 3E and ANC 3D that AU be required to place parking stickers in all AU-related vehicles At its Public Meeting on October 17, 2005, the Zoning Commission adopted the Campus Plan Remand Order which addressed the Court of Appeals' decision to further articulate its prior decision.

On September 1, 2005, the Zoning Commission unanimously approved an application (Z.C. Case No. 05-16) to add 2,173 square feet to the Campus through an addition to the Kogod School of Business and the adjacent New Lecture Hall building. Zoning Commission Order No. 05-16 was published in the DC Register on October 21, 2005.

REQUESTED SPECIAL EXCEPTION - PROPOSED NEW SIS BUILDING

SIS was founded in 1957 and has been headquartered in the same two-story building on Nebraska Avenue since its inception. The current SIS enrollment includes approximately 1,150 undergraduate students and approximately 925 graduate students that are from approximately 150 countries. The existing SIS building includes approximately 11,586 square feet which is not

sufficient to meet the programmatic and physical space needs of SIS Currently, SIS faculty are spread throughout other buildings on the campus. The need for a new SIS building was identified in the 1989 Campus Plan but was never built. The 2000 Campus Plan once again noted the need for the development of a new SIS facility

The proposed new SIS building will allow the school to conduct virtually all of its activities in its own building, providing flexibility to better support its academic program. It will also support the program by making available much higher quality facilities. These new facilities will help improve the school's competitive position among similar schools at other universities. The new SIS building provides up-to-date lecture halls, informal gathering spaces and offices for students, faculty and staff

The proposed new SIS building will be located along Nebraska Avenue at the approximate location of where New Mexico Avenue intersects Nebraska Avenue. This site is currently improved with a surface parking lot that provides approximately 90 parking spaces and is adjacent to the existing SIS building The approved Campus Plan refers to the existing parking lot as Building Site D and to the site of the existing SIS building as Building Site E. (See Exhibit A) The Campus Plan envisioned that Building Site D would include a building consisting of 100,000 square feet, a height of 60 feet and an underground parking garage. It was initially envisioned that a building accommodating library expansion, classrooms and academic offices would be constructed on this site The Campus Plan anticipated that the existing SIS building would be demolished and that an 80,000 square foot, 60 foot tall building with an underground parking garage would be constructed on Building Site E In total, the two parking garages on Building Sites D and E would include 520 parking spaces.

The Applicant has determined that the existing SIS building on Building Site E can still serve a beneficial purpose for the University in providing general classroom and office space. Therefore, the existing SIS building will not be demolished, rather the existing SIS building will be retained for classroom and office use by other university programs.

As depicted in the plans, sections, and elevations attached as Exhibit B, the new SIS building will include three floors above-grade plus a mechanical penthouse (and a terrace level below-grade), will have a maximum building height of 48 feet, and will include approximately 65,400 square feet of gross floor area. Two levels of below-grade parking will provide approximately 300 parking spaces. The entrance to the parking garage will be from a curb cut on Nebraska Avenue that aligns with the existing New Mexico Avenue/Nebraska Avenue intersection. The parking garage entrance has been designed with a long travel distance from Nebraska Avenue, via a curved vehicular entrance ramp, in order to prevent any adverse traffic impacts on Nebraska Avenue from cars waiting to enter the parking garage. No gate or ticket booth will impede cars from entering the parking structure in a timely and efficient manner. In fact, vehicles will travel unimpeded approximately 360 feet before encountering the first parking space.

The Applicant agrees to widen Nebraska Avenue, along its western edge in front of Building Sites D and E (within the existing public right-of-way), in order to provide a dedicated left turn lane for northbound vehicles making a left turn into the SIS parking garage and for vehicles making a left turn from southbound Nebraska Avenue onto New Mexico Avenue.

The appearance of the new SIS Building along Nebraska Avenue will be reminiscent of numerous existing buildings on Campus, with an updated architectural treatment. The façade will consist of precast concrete in a buff color with punched windows. The entrance to the

parking garage on Nebraska Avenue will be visually buffered through landscaping and hardscape materials A low stone wall will provide an appropriate visual buffer of the parking garage entrance from Nebraska Avenue The exterior of the new SIS building facing the Campus Quadrangle will provide an open and inviting presence at this end of the Campus. The façade will include large glass windows showcasing a rounded entry rotunda. The building's interior includes a large glass enclosed atrium with numerous areas for student interaction and small group meetings. A café terrace will also be created at the ground floor level in the area between the proposed SIS building and the Bender Library

The proposed new SIS building will also provide numerous environmentally sensitive features, including:

- The collection and storage of rainwater from the roof into a cistern for landscape irrigation use;
- The potential for future generation of renewable energy on site with roof mounted thin film photovoltaics;
- The optimization of window and skylight locations to bring daylight deep into the building, reducing the need for artificial lighting;
- The provision of fresh air into offices through the use of operable windows, the creation of natural air flows within the building using ventilated skylights and mechanical penthouses;
- Use of materials whose production minimizes harm to the environment; and
- A vegetated roof, which slows and filters stormwater runoff and provides thermal insulation for the building.

COMPLIANCE WITH THE REQUIREMENTS OF §210

In all respects, the requested special exception fully complies with §210 of the Zoning Regulations The specific zoning requirements are addressed in detail below.

College or University Which is an Academic Institution of Higher Learning (Subsection 210.1)

AU was chartered by an Act of Congress in 1893 and founded under the auspices of the United Methodist Church. AU's use of the property qualifies as a college or university use in accordance with §210 of the Zoning Regulations

The Use is Located so that it is Not Likely to Become Objectionable to Neighboring Property (Subsection 210.2)

The proposed new SIS building will not cause objectionable conditions to neighboring properties related to noise, traffic, number of students or other objectionable conditions The location of the new SIS building is not near any residential properties, and no student enrollment increase will directly result from this application In fact, the proposed new SIS building is considerably smaller than what the 2000 Campus Plan approved for this use and Building Site D. As noted above, the new SIS building will have a maximum building height of 48 feet and a maximum gross floor area of approximately 65,400 square feet. The 2000 Campus Plan approved a building with a maximum height of 60 feet and a maximum gross floor area of 100,000 square feet for Building Site D The new SIS building will maintain the same significant setback from the street as other buildings along Nebraska Avenue.

The Applicant has engaged the HNTB Corporation to be the traffic and parking consultant for this project Attached as Exhibit C is the Transportation Analysis prepared by HNTB that addresses the traffic and parking impacts of the proposed new SIS building. Based on studies of existing traffic operations on streets surrounding AU and parking behavior at AU lots, HNTB reached the following conclusions.

- Nebraska Avenue is congested during peak periods due to traffic volumes exceeding capacity at Ward Circle and, to a lesser extent, the Foxhall Road intersection.

- The proposed SIS parking garage would generate a small volume of new traffic on Nebraska Avenue, and thus result in no significant traffic impacts on this street. The computed change in delay due to this small volume change would go unnoticed by most motorists.
- Anticipated changes in traffic volumes are very small compared to the total volume of traffic on the roadways. The estimated increase in traffic volumes is on the order of the normal variation in traffic volumes from day to day.
- The alternative lane configurations and operating schemes examined for the proposed SIS driveway show little variation in average intersection delay and would go unnoticed by most motorists.
- The level of service analysis in itself does not justify widening Nebraska Avenue to five lanes with exclusive left turn lanes at New Mexico Avenue. The improvements would not result in noticeable travel time differences along Nebraska Avenue during peak periods because the true capacity constraints in the corridor would remain unaddressed.
- No increase in pressure on off-campus parking is anticipated.
- With proper site design, the SIS Building and its parking facilities will not interfere with pedestrians crossing Nebraska Avenue.

Compliance with the Maximum Bulk Requirements (Subsection 210.3)

AU's overall FAR is 0 55, which is well below the 1 8 FAR permitted under the Zoning Regulations. It should be noted that since the 2000 AU Campus Plan was approved, AU has added a net of approximately 48,232 square feet of academic/administrative space as a result of the demolition of several facilities, the construction of the Katzen Arts Center, and the 2,173 square foot addition to the Kogod School of Business. The addition of 65,400 square feet of gross floor area proposed in this further processing application, will increase the total FAR of the Campus to 0 57.

Submission of a Plan for Developing the Campus as a Whole (Subsection 210.4)

As noted above, AU's Campus Plan was approved by the Zoning Commission on January 8, 2002, April 30, 2002, and October 17, 2005. No changes to the Campus Plan are proposed as part of this application. The Campus Plan included the following conditions/guidelines for the development of Building Sites D and E:

- The height of the buildings should not exceed 60 feet and the gross floor area should not exceed 100,00 square feet for Project D or 80,000 square feet for Project E,
- The buildings should be setback from Nebraska Avenue the same distance as Hurst Hall;
- The Applicant shall provide trees and softscape to enhance the special character of Nebraska Avenue;
- The Applicant shall work with D.C. Agencies, neighboring property owners, and the community to develop a detailed streetscape plan for Nebraska Avenue from north of Ward Circle to Rockwood Parkway, incorporating the provisions for widening Nebraska Avenue, using AU's property, to add a fifth lane for turning movements; and
- The Applicant shall design ramps to the parking garage under the building to minimize the impact on Nebraska Avenue traffic from turning movements created as a result of this project.

The Applicant has designed the new SIS building in accordance with the conditions/guidelines noted above. In addition, the Applicant notes that the Office of Planning, in its February 8, 2001 report on the Campus Plan, made the following additional comments:

- This is clearly a site [Building Site D] for an important building on campus It is one of four important building sites along Nebraska Avenue, with the west side of the buildings relating to the Friedheim Quadrangle, the most important formal open space on campus.
- OP can find little evidence to recommend the Zoning Commission require entrances only on the interior of the campus Instead, OP agrees with the proposal for pedestrians to enter from a Nebraska Avenue entrance, similar to other University buildings on Nebraska Avenue.

As noted above, the proposed SIS building is only 48 feet tall, rather than 60 feet tall, and includes 65,400 square feet, rather than 100,000 square feet for Building Site D. The new SIS building maintains the same setback as Hurst Hall. As shown in the landscape and site plans attached as part of Exhibits B and D, the Applicant has artfully used hardscape and landscape elements to enhance the special character of Nebraska Avenue. The proposed arrival court includes architectural pavers rather than concrete, and provides a gracious entrance for vehicles and pedestrians. A series of rain garden elements have been introduced into the landscape plan, including one in the area in front of the existing SIS building. These water elements help

provide an interesting and varied landscape for the new SIS building while also providing significant environmental benefits

The initial application filed with the Zoning Commission did not provide for the widening of Nebraska Avenue. At that time, the Applicant and HNTB did not believe that the amount of traffic generated by the proposed SIS building warranted an additional lane of traffic on Nebraska Avenue. During the community dialogue process, the Applicant heard from community members and representatives of ANC 3D that the traffic situation on Nebraska Avenue was untenable and the addition of any new vehicles on Nebraska Avenue was not appropriate. Despite the fact that the HNTB Transportation Analysis concludes that the widening of Nebraska Avenue will not result in noticeable travel time differences along Nebraska Avenue during peak periods, the Applicant has agreed to undertake the cost of widening Nebraska Avenue, with the addition of a fifth lane to be used for left turns into the SIS parking garage and onto New Mexico Avenue from Nebraska Avenue. The detailed design of this lane will be in accordance with DDOT standards and input.

This additional lane is created within the public right-of-way along the western edge of Nebraska Avenue. As shown on the streetscape plan for Nebraska Avenue, attached as Exhibit D, the Applicant has created a plan that seamlessly transitions the softscape and hardscape elements of the areas between the building setback line established by Hurst Hall and the Nebraska Avenue right-of-way.

Finally, the Applicant has created a curved entry ramp, visually buffered from Nebraska Avenue by a two foot stone wall to the underground parking garage. No guard or ticket booth will impede access into the parking garage. Thus, the long curved entry ramp into the garage and the unencumbered movement of vehicles into the parking garage will minimize the impact

on Nebraska Avenue from cars entering the new SIS parking garage.

No Interim Use of Land is Proposed (Subsection 210.5)

No interim use of land is requested as part of this campus plan

No New Use Sought for Approved Site of Building Resulting from a Building Moved Off Campus (Subsection 210.6)

As noted above, Building Site D was originally intended to be developed with a building that was 60 feet tall, consisted of approximately 100,000 square feet and was to be used to accommodate expansion of the library and for additional classrooms and academic offices The Applicant has not created, at an off campus location, a building that provides these services. Therefore, the proposed SIS building on Building Site D does not require an amendment to the approved Campus Plan.

Compliance with the Policies of the District Elements of the Comprehensive Plan (Subsection 210.7)

The Project is not inconsistent with the policies of the District Elements of the Comprehensive Plan. The Project will further the goals and objectives of the Ward 3 Element of the Comprehensive Plan by enhancing educational facilities in the Ward without adversely impacting adjacent residential areas.

The Proposed Buildings Are within the Floor Area Limit for the Campus as a Whole (Subsection 210.8)

The existing Campus Plan FAR of 0.55 is within the permitted 1.8 FAR prescribed for the residentially zoned portions of the campus. As noted above, the additional square footage proposed by this application will increase the overall FAR for the campus to only 0 57.

Referral to the District of Columbia Office of Planning ("OP") and the District of Columbia Department of Transportation ("DDOT") (Subsection 210.9)

This application has been referred to OP and DDOT for their review and report. The Applicant has met with representatives of DDOT and OP regarding this application.

COMPLIANCE WITH ZONING COMMISSION ORDER NO. 949-A

Condition No. 17 of the Order provides, in part:

> No special exception application filed by the University for further processing under this plan may be granted unless the University proves that it has consistently remained in substantial compliance with Conditions 1 through 16 set forth in this Order.

As set forth below, AU has consistently remained in substantial compliance with these conditions.

Condition No. 1 – Approval of the Campus Plan shall be until August 15, 2011.

The approved Campus Plan is still in effect.

Condition No. 2 – The approved Campus Plan boundary shall be as shown in the approved Campus Plan.

The proposed special exception application does not seek any amendment to the approved Campus Plan boundaries.

Condition No. 3 – The maximum student enrollment (headcount) shall not exceed 10,600 students and the full-time equivalent shall not exceed 9,250 students. The number of employees shall not exceed 2,200

Student enrollment headcount as of Fall of 2004 was 9,595 and 8,820 full time equivalent. The faculty and staff population headcount is 1,507

Condition No. 4 – AU shall maintain a supply of on-campus housing sufficient to make housing available for 85% of its full-time freshman and sophomore students (headcount) and for two-thirds of all full-time undergraduates (headcount).

AU currently has an on-campus housing supply of approximately 3,400 student beds. In the Fall of 2004, AU enrolled 3,008 full-time freshman and sophomore students. AU therefore has on-campus housing available for 100% of its freshmen and sophomores and 65% of all undergraduates. AU has for many years been able to provide housing for all undergraduate students that requested housing. In previous years, this was accomplished by converting double rooms to triple rooms in dormitories on campus. The University recently increased its housing supply by leasing the Park Bethesda apartment building for use as student housing. The Park Bethesda is located at 5325 Westbard Avenue in Bethesda, Maryland – approximately 2 miles from the AU main campus. The Park Bethesda provides approximately 580 beds for primarily juniors and seniors. A free shuttle bus runs between the Park Bethesda and main campus every 15 to 30 minutes. Although the Park Bethesda is not located on campus, it provides additional housing for AU undergraduates and reduces the likelihood of students living in the neighborhoods surrounding the AU campus. With the lease of the Park Bethesda, AU has created a more attractive option for upper classmen that will encourage them to seek university-owned housing. If the 580 beds available in the Park Bethesda are counted as on-campus housing available to undergraduates, AU has the ability to house more than 67% of its undergraduates in university owned housing. Therefore, the Applicant believes that it is in substantial compliance with this condition

Condition No. 5 – Campus Facilities built for instructional purposes may, from time to time, be used for conferences.

The Applicant has not used Campus facilities built for instructional purposes for conferences on more than an infrequent, occasional basis.

Condition No. 6 – The University shall work with community representatives to form a Liaison Committee for the purpose of fostering consistent on-going communication between the University and the surrounding neighborhoods.

Since the adoption of the Campus Plan, the Applicant has held quarterly meetings with the Neighborhood Liaison Committee In the last year, the meetings took place on September 27, 2005, June 7, 2005, February 23, 2005, November 18, 2004, and August 18, 2004.

Condition No. 7 – The University shall adopt a program regarding enforcement of student, faculty, staff and vendor off-campus parking.

AU has adopted the required program regarding enforcement of student, faculty, staff, and vendor off-campus parking.

Condition No. 8 – The Applicant shall designate at least 12 of the 76 existing parking spaces at the Tenley Campus for student use.

AU has designated 12 of the 76 existing parking spaces at the Tenley Campus for student use.

Condition No. 9 – The Applicant shall submit each individual request to construct a building described in the Campus Plan to the Zoning Commission as a special exception The University shall submit information as to how the structure complies with the Plan, an updated traffic analysis, a report indicating the supply of on-campus housing, the number of undergraduate students, and the number of full-time freshman and sophomore students.

The Applicant has submitted the present request to construct the Project to the Zoning Commission as a special exception. A traffic analysis is attached as Exhibit C. The issue of housing supplied by the Applicant for its undergraduate students, and the number of undergraduate students (including freshman and sophomore students) is addressed above.

Condition No. 10 – The Applicant shall not construct more than 400,000 square feet of new gross floor area during the term of this Campus Plan.

As previously noted, a net of approximately 46,059 square feet of new gross floor area has been added to the Campus since 2000 On September 1, 2005, the Zoning Commission approved the addition of 2,173 square feet of new gross floor area to the Kogod School of Business A 20,000 square foot addition to the Mary Graydon Center was approved with the Campus Plan and is scheduled to start construction next year. The proposed new SIS building will include 65,400 square feet of gross floor area Therefore, AU has proposed the addition of 133,632 square feet of gross floor area, well within the 400,000 square feet of new gross floor area permitted during the term of this Campus Plan

Condition No. 11 – The University shall implement its "Neighborhood Action Program" to address off-campus conduct by students living in neighborhoods adjacent to the campus

AU has implemented its Neighborhood Action Program to address off-campus conduct by students living in neighborhoods adjacent to the campus.

Condition No. 12 – The Applicant shall direct its students to register their vehicles in the District of Columbia, or obtain a reciprocity sticker if eligible to do so. The Applicant shall withhold parking privileges from students who do not comply with D.C registration requirements.

AU has complied with this requirement.

Condition No. 13 – The University shall adopt a Campus Lighting Plan

AU has adopted and followed the approved Campus Lighting Plan.

Condition No. 14 – The University shall implement a Campus Landscape Plan that includes landscaping the interior ring road and the Katzen Arts Center. The University shall maintain all of the landscaped areas

AU has implemented and followed the approved Campus Landscape Plan and all landscaping has been well-maintained to present an attractive and healthy appearance.

Condition No. 15 – Special Events held on the University's athletic fields on the western edge of the campus are subject to certain conditions.

The University has complied with all requirements for special events on the athletic fields. There has been only one special event each year in 2004 and 2005.

Condition No. 16 –The University shall provide notification to the D.C. Department of Health, the Army Corps of Engineers (Baltimore Office), and the U.S. Environmental Protection Agency, Region 3 each time that the University files a permit application for ground clearance, excavation, or other major construction that would implicate remedial work performed at or around the campus by the Army Corps of Engineers.

The University has satisfied this condition.

COMMUNITY OUTREACH

The University has continued to actively engage in dialogue with members of the adjacent community and the ANC regarding the proposed new SIS building. Representatives of the University made presentations to ANC 3D on July 6, 2005 and October 5, 2005 regarding this application. University representatives also made a presentation to ANC 3E on July 14, 2005 to further notify the larger community of this project The Applicant made presentations to smaller neighborhood working groups regarding the new SIS building on March 15, 2005, April 19, 2005, May 17, 2005, and September 20, 2005, as well as providing SIS project updates at the Liaison Committee meetings A list of the neighborhood liaison committee and community representatives, the agendas and notices for the neighborhood working group meetings, and correspondence between the Applicant and neighborhood representatives is attached as Exhibit E.

On October 5, 2005, ANC 3D adopted a resolution in opposition to the proposed application. The Applicant believes that the ANC's opposition is based in large part on the perceived adverse traffic impacts that the application will have on the surrounding neighborhood. As noted above, subsequent to the ANC's October 5, 2005 vote, the Applicant agreed to widen

Nebraska Avenue to provide for a dedicated left turn lane for vehicles making a left into the SIS building's parking garage from Nebraska Avenue and a left onto New Mexico Avenue from Nebraska Avenue. The Applicant believes that the proposed widening of Nebraska Avenue addresses the objections to the application raised by the ANC.

EXHIBITS

Exhibit A. Campus Plan 2000: Building Sites.

Exhibit B Plans/elevations/sections of the new SIS building.

Exhibit C Transportation Analysis for the new SIS building, prepared by the HNTB Corporation.

Exhibit D· Proposed landscape plan and context plan for Nebraska Avenue.

Exhibit E· List of the neighborhood liaison committee and community representatives, the agendas and notices for the neighborhood working group meetings, and correspondence between the Applicant and neighborhood representatives.

Exhibit F· Outlines of witness testimony

WITNESSES

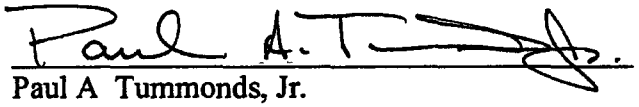
1. David Taylor; Chief of Staff to the President, American University
2. Jorge Abud; Vice President of Facilities and Administrative Services, American University
3. Carl Elefante; Project Architect, Quinn Evans Architects.
4 Marsha Lea; Project Landscape Architect, EDAW
5 Matthew Houston and Owen Curtis; Representatives of traffic and parking consultant, HNTB Corporation.

CONCLUSION

For the reasons stated above, this application meets the special exception requirements for further processing of an approved Campus Plan.

Respectfully submitted,

PILLSBURY WINTHROP SHAW PITTMAN, LLP

By 

Paul A Tummonds, Jr.
Land Use Counsel for American University