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April 20, 2015

VIA HAND DELIVERY

Anthony Hood
Chairperson, D C Zoning Commission
441 4th Street NW, Suite 210
Washington, DC 20001

Re **Application of The George Washington University ("University") for
Modification of Conditions C-4 and C-7 of Z.C. Order No. 06-11 / 06-12
(Foggy Bottom Campus Plan – Corcoran Campus)
Applicant's Pre-Hearing Statement**

Dear Chairman Hood and Members of the Commission.

On February 4, 2015, the University filed a request to modify Conditions C-4 and C-7 of Z.C. Order No. 06-11/06-12 in order to make it clear how the Campus Plan accounts for students associated with the recently-acquired Corcoran College of Art and Design ("Corcoran College") The University offers the following pre-hearing statement in support of its request:

Overview

The Corcoran College is located at 500 17th Street NW (Square 171, Lots 814 and 816) ("Corcoran Campus") The Corcoran Campus is located in the SP-2 Zone District, and approximately two blocks east of the 19th Street boundary of the Foggy Bottom campus

The Corcoran Campus is surrounded by government office and institutional uses. There are no residential properties between the Foggy Bottom campus and the Corcoran campus—in fact, the closest residential use to the Corcoran campus is actually a University residence hall at 1959 E Street, two blocks west. The Corcoran Campus is also located outside of the defined boundaries of the "Foggy Bottom/West End" neighborhood area (which is bounded by N Street

NW on the north, the Potomac River and Rock Creek Park on the west, Constitution Avenue NW on the south, and 19th Street NW on the east) ¹ (Exhibit A Map.)

The existing Corcoran College is a permitted conforming use. Use as a college was first established in the late 1800s. When the current Zoning Regulations took effect in 1958, the regulations permitted a college use as a matter of right in the SP zone district. Although the Regulations now require a special exception for a college or university use in the SP zone district, the existing college use is permitted to remain as a pre-existing conforming use. Prior to the University's takeover in August 2014, the Corcoran College enrolled approximately 400 students, equally divided between graduate and undergraduate students.

Pursuant to agreements with the Corcoran Gallery of Art and the National Gallery of Art, ownership of the Corcoran Campus was transferred to GW. The University has taken over responsibility for the upkeep and maintenance of the property as well as operations of the Corcoran College.

Impacts of Corcoran Students on the Foggy Bottom Campus

Students at the Corcoran Campus are not a new presence in the area. Rather, the educational use has existed in this location for many years, and historically at higher enrollment levels than the current levels. For many Corcoran students, their academic and living patterns will remain largely unchanged - they will attend classes, create, study, commute, eat and sleep in the same manner that they always have.

The University has carefully considered the potential impacts of Corcoran students on the Foggy Bottom campus and surrounding residential neighborhoods, and proposes to modify the conditions of the Campus Plan to account for their impacts based on the same metrics used by the Commission in developing the original Foggy Bottom Campus Plan conditions—where students take classes, and where students live.

Impacts based on Enrollment As University students, the Corcoran College students have the opportunity to take classes at other University campuses, including the Foggy Bottom Campus. Currently, only four Corcoran students are enrolled in a class at Foggy Bottom. Over time, as the Corcoran College is integrated into the broader University curriculum, the University expects that more undergraduate students will begin to take some of their courses on the Foggy Bottom campus as part of a core curriculum.

¹ See Condition P-1, Z C Order No. 06-11/06-12.

However, GW anticipates that the bulk of the classes in art and design will continue to be offered at the Corcoran Campus

Impacts based on Housing: As University students, the Corcoran College students also have the opportunity to live in University housing. Currently, 34 students elected to live on the Foggy Bottom campus. Going forward, the University will also require freshman and sophomore undergraduate students that matriculate into the Corcoran College as of Fall 2015 to reside in Foggy Bottom campus housing. As a result, approximately half of the undergraduate students will reside on the Foggy Bottom campus.

Therefore, in order to account for the impacts of Corcoran students who will take classes or live on the Foggy Bottom Campus, the University has proposed to amend the conditions as follows:

- Count any Corcoran student who takes a class on the Foggy Bottom campus counts toward the Foggy Bottom headcount and FTE caps.
- Count any Corcoran student who resides on the Foggy Bottom campus toward the Foggy Bottom headcount cap, regardless of whether the student takes classes on the Foggy Bottom campus.
- Starting with the Class of 2019, require all freshmen and sophomore students who take classes at the Corcoran to reside in Foggy Bottom housing.

The University is voluntarily offering these modifications solely to provide clarity and transparency regarding how the University will account for Corcoran students. No modification of the student caps is sought, nor does the University seek to change any other conditions of the Campus Plan or related First-Stage PUD.

Response to Community Issues

The University discussed the proposed modifications with ANC 2A and Campus Plan Advisory Committee in November 2014, and returned to the ANC for further discussion in April 2015. At the April 2015 meeting, the ANC adopted a resolution recommending that the Commission count all Corcoran students as a part of the Foggy Bottom campus, even if the students do not take a class or reside on the Foggy Bottom campus. The University also discussed the proposed modifications with the West End Civic Association in December 2014. In its application for party status, WECA similarly contends that all Corcoran students should be

counted because they may use other Foggy Bottom campus resources or impose traffic and parking impacts on the Foggy Bottom Campus

The University respectfully disagrees with ANC 2A and WECA's position, for many of the same reasons that the Commission concluded that other non-Foggy Bottom students should be excluded from the enrollment caps in 2007. First, many Corcoran students will attend classes, create, and study exclusively at the Corcoran campus. To the extent that some Corcoran students will have a relationship with the Foggy Bottom campus, the University's proposed changes capture those impacts with a sieve rather than a trawling net. The University's proposal will only count those Corcoran students who have a "primary relationship" with the Foggy Bottom campus – meaning those students who take a class at the Foggy Bottom campus. This is the methodology that was accepted in the 2007 Campus Plan in which the Commission adopted the definition of "Foggy Bottom Student Headcount," which excluded students who took all of their courses at the Mount Vernon Campus on Foxhall Road. See Finding of Fact # 47, in Zoning Commission Order No. 06-11/06-12 (2007)

The ANC and WECA raise concerns about the impacts of those Corcoran students who may not take a class or reside in campus but could nevertheless come to the campus for some other reason, such as to use the library, student bookstore or other facilities. However, modern technology and University policies continue to significantly reduce the need to come to the Foggy Bottom campus to use these facilities. Research, book purchases, course registration, and other formerly centralized activities are all regularly conducted online.

ANC and WECA also raise concerns about Corcoran students who could come to the Foggy Bottom campus to use the Lerner Health and Wellness Center. However, this concern is also unfounded. The zoning order for the Center – recently reapproved last summer in Z.C Order No. 02-26B – explicitly limits use of the Center to Foggy Bottom and Mount Vernon students, students who take classes or reside on campuses that are subject to enrollment caps. Thus, if a Corcoran student qualifies to use the Lerner Center, that student will be counted against an enrollment cap. Moreover, the Zoning Commission specifically found that opening the Lerner Center to Mount Vernon students would not create objectionable impacts on the Foggy Bottom community, Z.C Order No. 02-26, and thus even if the Lerner Center were open to students who take all of their classes at the Corcoran, there would similarly be little objectionable impact.

ANC and WECA also raise concerns about the potential transportation impacts of Corcoran students on the surrounding neighborhood. The Corcoran Campus is located approximately 4-5 blocks from the Farragut West and Farragut North Metrorail entrances, and it is expected that Corcoran students will continue to use mass transit, walking, and biking as the

primary means of traveling to and from campus. Moreover, as University students, all Corcoran students will be subject to the same University Code of Conduct, which prohibits freshman and sophomore students bringing cars to the Foggy Bottom/West End Area and limits student parking in the streets adjacent to and surrounding the Foggy Bottom campus pursuant to Condition C-13 of the Campus Plan

Therefore, for all of the above reasons, the University strongly believes it is not necessary to include all of the Corcoran students within the Foggy Bottom Campus Plan headcount and FTE caps. The University's proposed modifications are carefully tailored to capture and count those Corcoran students that will have impacts on the Foggy Bottom campus and surrounding area.

Finally, to the extent that ANC and WECA's concerns are motivated by a general concern about the impact of Corcoran students at the Corcoran Campus itself on the Foggy Bottom / West End residential neighborhoods, these fears are unfounded. Again, the Corcoran Property has hosted a college presence for many years, and the Corcoran Campus is located outside of the easternmost boundary of the Foggy Bottom / West End area, nearly three blocks away from the nearest non-University residential property. The only District of Columbia resident that arguably proximate is the President of the United States who, to date, has voiced no objection.

List of University Properties and Property Owners' List

Subsequent to the filing of the initial application, the University updated the list of properties located within the boundaries of the Foggy Bottom campus to reflect lot and property changes that have taken place since the filing of the 2007 Foggy Bottom Campus Plan. The current list of properties was reflected in the prehearing notice and is attached as Exhibit B.

Prior to the issuance of notice, the University also provided the Office of Zoning with an updated list of all property owners within 200 feet of the Foggy Bottom campus. A copy of this list is attached as Exhibit C.

List of Witnesses and Outlines of Witness Testimony

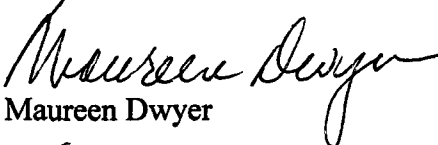
At the hearing, the Applicant intends to offer testimony from two University witnesses: Alicia Knight and Charles Barber. Ms. Knight and Mr. Barber will provide an explanation of the

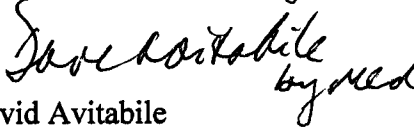
background for and mechanics of the proposed modifications to the Foggy Bottom campus plan conditions.

Conclusion

We welcome the Commission's consideration of these modifications at the public hearing scheduled for Monday, May 4, 2015. If you have any questions regarding this request, please contact Maureen at (202) 721-1101 or Dave at (202) 721-1137

Sincerely yours,


Maureen Dwyer


David Avitabile

cc: Alicia Knight
Charles Barber

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CERTIFICATE OF SERVICE

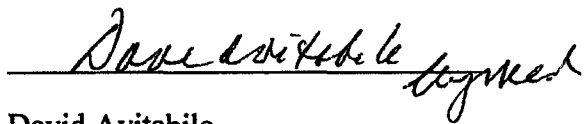
On April 20, 2015, I caused a copy of the foregoing letter and enclosure to be delivered by hand or electronic mail to the following:

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West End Citizens Association
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Washington, DC 20037

President, Foggy Bottom Association
c/o Marina Streznewski
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David Avitabile