

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF PLANNING



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DC OFFICE OF ZONING

2006 APR 10 PM 4 57

Office of the Director

Memorandum

TO: District of Columbia Zoning Commission

FROM: *ELM*
Ellen McCarthy, Director
Office of Planning

DATE: April 10, 2006

SUBJECT: Setdown Report for text amendment related to George Washington University Campus Plan - ZC #06-19

APPLICATION

The George Washington University has petitioned the Zoning Commission for approval of a new twenty year campus plan. As an implementation strategy of the new plan, the Office of Planning is recommending a text amendment to the zoning regulations in Section 210.3. As this amendment is subject to and interrelated with the campus plan, please see the report for ZC #06-11 and ZC #06-12 for a full report on the proposed amendment and related plan.

OP recommends that the proposed text amendment be set down for public hearing.

ZONING COMMISSION
District of Columbia

CASE NO. 06-19

EXHIBIT NO. 1

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF PLANNING



Office of the Director

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Memorandum

TO: District of Columbia Zoning Commission

FROM: 
Ellen McCarthy, Director
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DATE: April 10, 2006

SUBJECT: Setdown Report for George Washington University Campus Plan 2006-2025 ZC #06-11, related first-stage PUD and map amendment - ZC #06-12, and related text amendment ZC #06-19

APPLICATION

The George Washington University has petitioned the Zoning Commission for approval of a new twenty year campus plan. Future developments on the George Washington University campus would be subject to a first-stage PUD filed in conjunction with the campus plan. The first stage PUD should be effective for the life of the plan and all subsequent development on the campus for the life of the plan will be filed as second-stage PUDs subject to the plan and first-stage PUD. In conjunction with these applications, a text amendment is proposed for Section 210 of the Zoning Regulations affecting campuses in the R-5-D and R-5-E zone districts. While filed under separate application numbers, the plan, PUD, and text amendment are all interdependent and OP recommends that they be heard together.

SUMMARY RECOMMENDATION

OP has spent more than a year working with GWU and the surrounding community on the specifics of this plan. OP recommends that the applications be setdown for public hearing and will continue to work with GW and the community to finalize outstanding issues prior to the public hearing.

DESCRIPTION OF THE CAMPUS AND SURROUNDING AREA

The GW campus is located in northwest Washington between 19th Street on the east, 24th Street on the west, E Street to the south and Pennsylvania Avenue to the north. First relocated to the area in 1912, the campus saw its largest growth in the 1920s, 30s, and 40s with many of its existing buildings constructed during this time period. The present campus boundaries were established through the campus plan process in 2001

The campus sits at the east end of the historic Foggy Bottom neighborhood, an area characterized by late nineteenth century two-story townhouses and early twentieth century mid-rise apartment buildings. To the east of campus are several international financial institution buildings, including buildings for World Bank and the International Monetary Fund. Across Pennsylvania Avenue to the northeast is the Golden Triangle business district. Across Washington Circle to the northwest of campus is the West End

neighborhood. Finally, to the south of GW is an area of federal buildings known as the Northwest Rectangle.

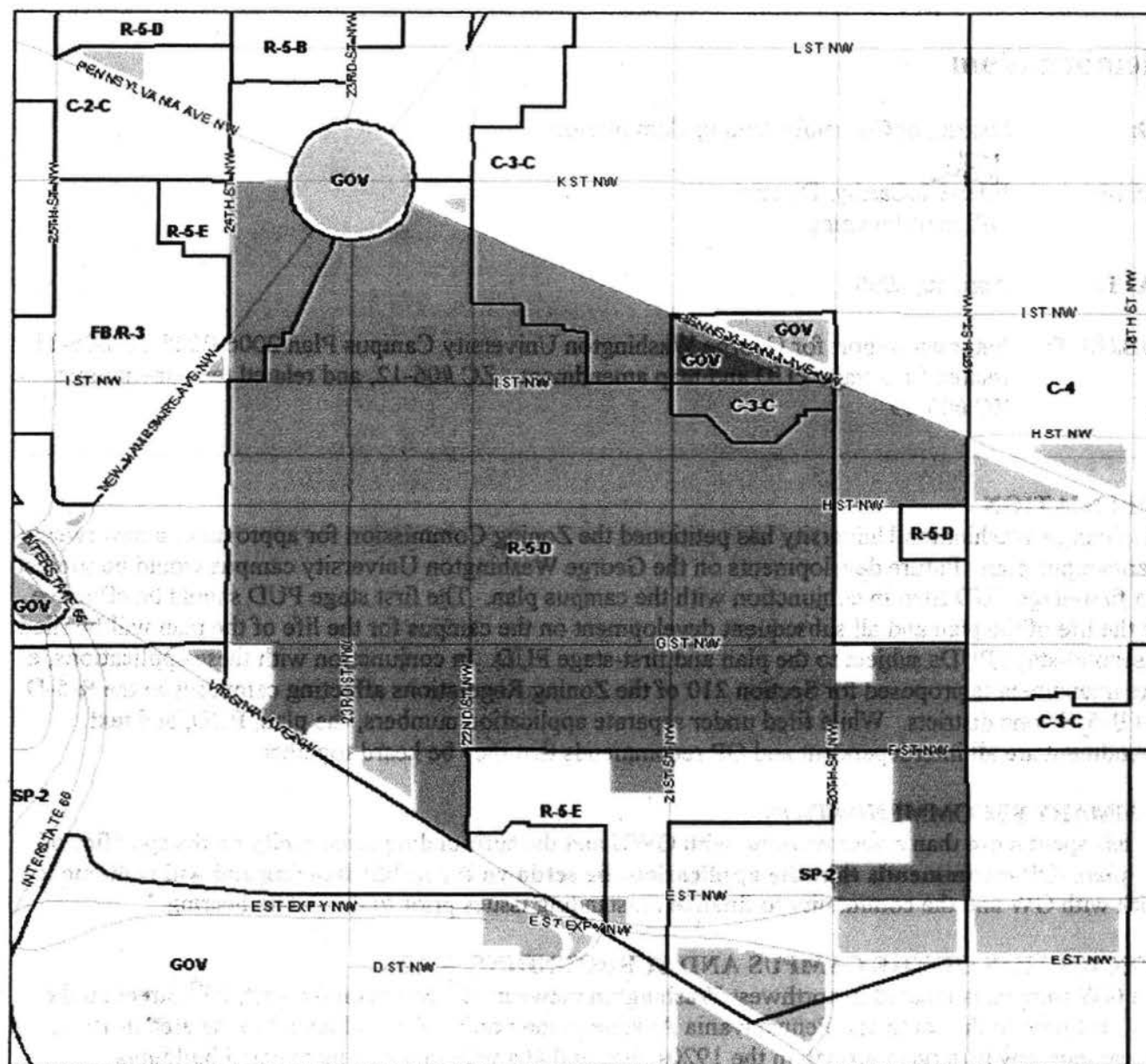


Figure 1: Existing Zoning

BACKGROUND

GW approached the Office of Planning in late 2004 to discuss the possibility of developing the old hospital site (Square 54) for investment purposes. At that time, OP made clear to GW that we would not support any non-academic uses on Square 54 without a detailed plan showing that GW's academic needs could be met on the remainder of campus. It was suggested that GW begin a process of meeting with community members. In March 2005, a negotiated planning process was attempted between GW,

OP, ANC 2A, and the Foggy Bottom Association (FBA). The mediated negotiation process was abandoned when the FBA withdrew before sides could reach agreement on meeting terms.

In early May of 2005, GW and OP cosponsored an Urban Land Institute Panel to examine the redevelopment of Square 54. The panel interviewed stakeholders including representatives of the university, the Foggy Bottom and West End neighborhoods, the business community, and the city government. The panel concluded that a mix of commercial and residential development was the best future use for the site, *provided* that GW could meet its future academic needs within the existing campus boundaries.

In June 2005, GW, OP, and ANC 2A began a series of community meetings to discuss Square 54 and the campus development plan. Four meetings were held between June and September of last year in which the public was given the opportunity to review and comment on iterations of GW's proposed development plan. In November 2005, the ANC passed a resolution withdrawing itself from further discussion on the plan.

Between September 2005 and March 2006, OP continued to review GW's proposed development plan and offer comments and suggestions. The plan presented in GW's submission to the Commission is vastly changed from the original concepts and reflects changes based on community, professional, and government comments. OP believes that the plan reflects GW's best effort yet to create a detailed long-term development plan for its campus, contribute to an open, transparent process, and work to address community concerns straight-forwardly and for mutual benefit.

EXISTING SITUATION

The current GW campus plan was approved in 2001. It is effective for three more years, until June 2009. The current plan was an attempt to find a middle ground between the University and the surrounding community that would meet the needs of both. Unfortunately, the current plan does not meet the needs of either side. From the community perspective, the existing plan has not adequately protected it from the negative effects of an undergraduate student population. It has not adequately prevented GW from expanding university ownership and use outside of campus boundaries. It has not provided enforceable standards for student and employee headcounts. Perhaps most importantly, it has not promoted cooperation between the community and university in the development of new buildings or the implementation of goals. From the university perspective, the existing plan limits overall campus development to a level that is lower than the high density zones that surround the campus on all sides with the sole exception of the Foggy Bottom Historic District. It does not provide a realistic picture of, or plan for, the university's future space needs. It provides little indication of what sites are appropriate for development from the community or city perspective and what sites are historic or otherwise significant. It provides no guidance in counting student enrollment and employees. Finally, as stated above, it does not encourage cooperation between the university and community to find mutually beneficial solutions to problems.

PROPOSED PLAN

The proposal submitted by GW for consideration would replace the existing plan in its entirety. It is intended that all aspects of the existing plan that are still relevant would be brought forward into the new plan. The new plan incorporates several elements, each of which are summarized here and discussed in detail later in the report.

First, through work with OP Historic Preservation staff, GW has identified sites and areas on campus that are worthy of historic protection. It is the intention of OP that these sites will be protected through a potential historic district limiting demolition of existing contributing buildings

Second, based on meetings with OP and the community, GW has created a development plan that reflects 1) the space needs of the university, 2) the height and massing concerns of neighboring properties to the west and south of campus, 3) the historic resources identified above, and 4) the type and density of proposed development sites appropriate based on all factors. The main themes that have arisen from the process have been minimizing height and bulk at the periphery of campus, concentrating density along 22nd Street in the center of campus, recognizing and planning for green space and pedestrian corridors, and identifying and reinforcing the character of the various campus streets.

Third, the GW commitments on the attached list are intended to be conditions of approval. All relevant conditions from the previous campus plan order have been carried forward. Further, several new commitments have been agreed to by GW in discussion with OP. Significant new commitments include, removal of all undergraduate students from off-campus housing, an agreement not to purchase Foggy Bottom/West End residential property for university use, limitation of development to identified sites, regular audits of enrollment numbers, agreement not to challenge commitments in court, and agreement to abide by the plan for a twenty-year time period.

Fourth, the process agreed to by the University at the request of the Office of Planning requires the submission of a campus-wide first stage Planned Unit Development, and the submission of individual second stage PUD applications for each development project. This process accomplishes several goals as outlined later in this report including providing the Zoning Commission with design control over future GW projects, providing flexibility in building design, limiting both location and mechanisms for future development projects, and providing both the university and the community with comfort as to what buildings can be located where over the next twenty years

Finally, the plan recognizes that there is a limit in both the student enrollment and building density that this historic area can reasonably accommodate. OP, GW, and the community have all agreed that the existing enrollment cap should not be changed or exceeded. This is reflected in the new plan. In addition, the campus has a limit on the amount of building density it can support based on existing structures and surrounding uses. GW, in consultation with OP and the community, has made an effort to define where density is appropriate through the proposed development plan. While this plan goes above and beyond the zoning regulation requirements for campus plans in terms of identifying and limiting development, the total FAR in residentially zoned properties will exceed the currently allowed 3.5. In light of the level of detailed planning that has gone into the plan and the restrictions on development and growth, OP recommends a text amendment to allow for 4.0 FAR for campus plans in the R-5-D and R-5-E districts. In addition, some of the building sites in the core of campus contemplate higher density than would otherwise be allowed and require a PUD related zoning change to C-3-C

These aspects are described and explained in more detail below

HISTORIC RESOURCES

Foggy Bottom and the West End first developed as a prestigious residential area near the White House. From the establishment of the city, Pennsylvania Avenue was the main artery connecting the capital to Georgetown, and it was also the location of the city's first streetcar line, established during the Civil

War Because of the proximity to the White House and this transportation artery, the northern and eastern sides of the neighborhood were among the first areas of the city to develop. Toward the west and south, development was slower and more oriented to mercantile and manufacturing uses because of proximity to the old canal and waterfront, and because the low-lying land was less desirable.

A few large pre-Civil war houses still remain in the neighborhood today, and several of these are designated historic landmarks. As the neighborhood developed through the 19th century, it gradually filled in with mostly rowhouses on the side streets and commercial buildings along Pennsylvania Avenue. Churches and schools were scattered through the neighborhoods. Most of this Victorian era development has disappeared, but there are still a few blocks that remain from this period, such as the 2100 block of G Street or the 700 block of 22nd Street, NW.

By the early 20th century, new and larger buildings arrived in this area as the commercial and government core of the city expanded and apartment buildings became common in inner-city neighborhoods. Large government and institutional offices, such as the Winder Building were first located near the White House and Executive Office Building, but they gradually proliferated to fill virtually the entire area south of E Street. During the 1920s and 1930s, tall apartment buildings and apartment-hotels became common throughout the neighborhood, many located on prime corner sites. About a dozen of these apartments remain today, many converted to dormitory use.

George Washington University became a presence in the neighborhood by 1912, when it occupied a building at 2023 G Street, NW. During the following decades, GWU gradually expanded first by converting older buildings to academic use, and then by constructing its own new facilities. Several of these early GWU buildings, both converted and purpose-built, are designated historic landmarks. The university continued to grow and build after World War II, as institutional and commercial offices also expanded along Pennsylvania Avenue. Today, most of the neighborhood is dominated by these modern structures, although many older structures and a number of intact older blocks remain to document the history of the neighborhood. Part of the area appears to qualify for designation as a historic district reflecting all phases of neighborhood history, and other properties appear eligible for historic landmark designation.

The GWU campus includes both designated and eligible historic properties. Within the campus plan boundaries there are 12 existing historic landmarks, including Red Lion Row, the D.C. Fire House (Engine Company 23) and 10 other buildings owned by the university. These landmarks include pre-Civil War houses like Woodhull House and the Alumni House, Victorian rowhouses that have been converted for academic use (including the Oscar Underwood house, a National Historic Landmark), the first classroom and dormitory buildings constructed by the university starting in the 1920s, and the World War II-era Lisner Auditorium.

In addition to these designated historic landmarks, many other buildings within the campus boundary have been identified as either potential historic landmarks or contributing buildings within a potential historic district. The potential historic district includes several blocks of the campus where there are largely intact streetscapes of Victorian rowhouses intermixed with taller early-20th century apartment houses. This historic character is most evident in the southern part of the campus along 20th, 21st, 22nd F, and G streets, which retain the rich visual character of a historic residential neighborhood. In the middle of the campus, the potential district also includes the original university quadrangle and older campus buildings dating from the mid-1920s to the early-1950s. These buildings document the

history of the university as it established a campus presence in the neighborhood and gradually formulated its institutional image. They reflect a transition from a traditional Colonial Revival style to a more contemporary Art Moderne or International style expression as the university grew. Completing the eligible district are two churches, the Ulysses Grant School (School Without Walls) built in 1882, the former St. John's Orphanage built in 1914, and several apartment buildings beyond the campus boundary.

The campus also includes a number of potential historic landmarks. At 2131-33 G Street is the original office and studio of John Joseph Earley, a nationally significant craftsman who pioneered the development of polychrome architectural concrete. Earley's work in Washington includes Meridian Hill Park, Franciscan Monastery, Sacred Heart Church, and other historic landmarks. The Hall of Government at 21st and G Streets is the oldest of several university buildings by noted modernist architect Waldron Faulkner, and the site of a significant academic seminar relating to the development of the atomic bomb. The Spanish Revival United Methodist Episcopal Church at 814 20th Street is significant for its historical associations and architectural style. About half of the 1920s and 1930s apartment buildings now used as GWU dormitories are outside the boundaries of the potential historic district, but could be designated under a thematic grouping of historic apartments.

GW has been working closely with Historic Preservation staff to identify the mechanism for recognizing and protecting historic structures on campus. At this time it is contemplated that GW will form a Potential Historic District that will encompass the areas and buildings described above. The district would protect resources that have been determined to be contributing from demolition, while allowing GW to proceed on any project identified in the development plan. The process of forming this district is scheduled to begin at the Historic Preservation Review Board in May. GW will have a status report as well as proposed boundaries of the district by the public hearing for the plan.

DEVELOPMENT PLAN

Section 210.4 of the zoning regulations requires a development plan for the campus showing buildings and campus facilities. The existing plan provides general guidance for new development in terms of use and sites, but does not take the larger step of defining where height and bulk are appropriate on the campus and where the existing density and buildings should be maintained. One of the main purposes of the new plan is to fill that gap. The evolution of the proposed development plan involved a thorough review of available campus infill sites, surrounding zoning, surrounding uses, surrounding density, existing campus uses and density, as well as the historic resources above. All of these factors led to changes from the original plan that shows full development on all open campus sites, to the proposed plan that reflects the reality of the existing situation, the effects on campus neighbors, and the needs of the university.

The main theme resulting from the planning process that affected the development plan was the idea that additional height and density were not appropriate on the south and west portions of campus and should be limited to the core of campus along the 22nd Street corridor. This led to changes in the development plan that removed development sites along the peripheries of campus and added infill sites around the intersections at 22nd & H and 22nd & I Streets. This single concept accomplishes multiple city and community goals. It protects the historic view corridor along 23rd Street. It limits impacts of development on the historic Foggy Bottom area west of campus; there will only be one new building west of 23rd Street and infill of unused space on square 41. The historic G Street corridor will be preserved largely intact, with only two new buildings and a height of 80' on G Street. This will also

serve to limit the impacts on residential uses south of campus. Historic buildings on Square 102 will be enhanced with infill rather than overshadowed. The contemplated retail corridor along I Street can be fulfilled. Finally, the bulk of new GW square footage can be gained by more efficient development on central campus rather than bulky new buildings throughout the campus area.

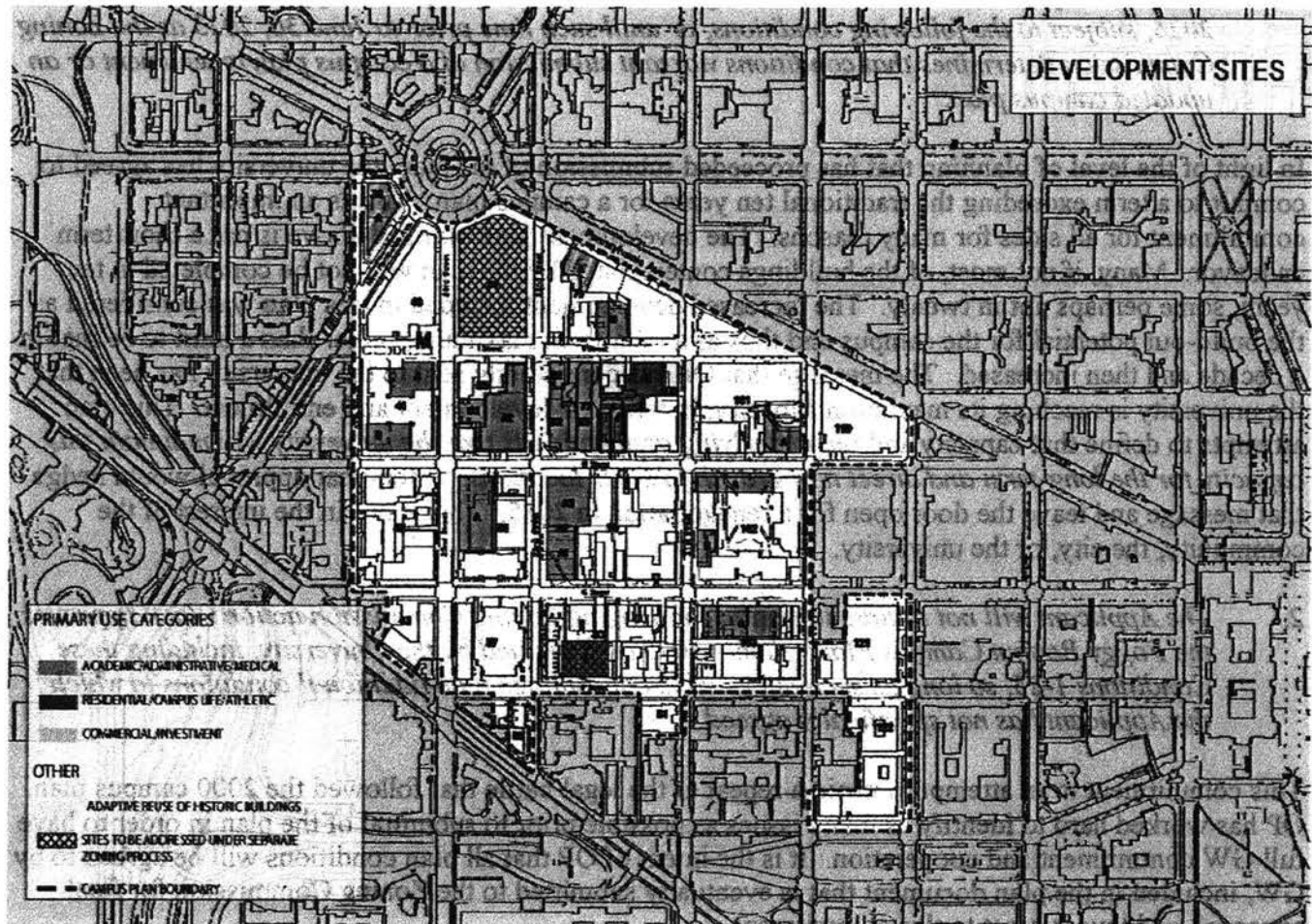


Figure 2: Development Sites

One of the most significant achievements of this plan is that, because of the comprehensive level of planning that has occurred, GW can commit to the city and the neighborhood that no development will take place outside of the proposed sites. The previous plan allowed further processing applications, which meant that developments not identified on the plan but in general consistency with the plan could be submitted by the University. The proposal with this plan would be for the university to limit all new development on campus to the sites identified on the development plan at the heights and densities agreed to. This aspect is further discussed in the PUD section of this report.

GW COMMITMENTS

In addition to bringing forward all of the relevant conditions from the 2000 campus plan, the university has added several significant commitments and clarified others in an attempt to meet the requests of the city and Foggy Bottom/West End community. OP has spent a significant amount of time negotiating

commitments by the university and reviewing the final language presented here. The commitments are attached as a separate document to this report, but also discussed in detail here.

1. *The Applicant's proposed campus plan replaces the George Washington University Foggy Bottom Campus Plan: Years 2000 through 2009. This campus plan is approved until June 30, 2025, subject to the following conditions, or until such time prior to June 30, 2025 as the Zoning Commission determines that conditions warrant submission of a campus plan amendment or an updated campus plan.*

In light of the level of planning that has proceeded submission of the plan, the university has agreed to commit to a term exceeding the traditional ten years for a campus plan. This is an important commitment for all sides for many reasons. The development plan outlined above is not a short term endeavor. Many, if not most, of the buildings contemplated by the plan will not be completed in ten years, some perhaps not in twenty. The increased development included in this plan was considered as the build-out potential for the campus and thus as a long-term maximum, rather than a limit to be met in a decade and then increased. The message that OP has consistently sent to the university has been that the university is reaching its maximum capacity, in terms of development and enrollment. This plan attempts to define that capacity and *the underlying assumption is that the university will maintain this capacity for the long-term and direct new growth to other locations.* A ten-year approval would hedge that message and leave the door open for a renegotiation in 2015. This is not in the interest of the community, the city, or the university.

2. *The Applicant will not initiate litigation challenging Zoning Commission action which approves the Foggy Bottom Campus Plan: 2006 – 2025 as submitted by the University, including these Conditions 1-25, so long as such approval is not contingent on additional conditions to which the Applicant has not specifically agreed.*

This commitment is an attempt to avoid a repeat of the legal battle that followed the 2000 campus plan. OP has worked hard to identify as many issues as possible prior to submittal of the plan in order to have full GW commitment and cooperation. It is the intent of OP that all plan conditions will be agreed to by GW, included in the plan document that is eventually submitted to the Zoning Commission for final approval, and thus subject to this commitment.

3. *The campus plan boundary for the Foggy Bottom Campus Plan: 2006 – 2025 shall remain consistent with the campus plan boundary established by the Board of Zoning Adjustment with respect to the Foggy Bottom Campus Plan: Years 2000 through 2009 (Order No. 16553-1). The properties included within the Foggy Bottom Campus Plan boundary are depicted in Exhibit I of the proposed Foggy Bottom Campus Plan: 2006 – 2025 and are specifically identified and listed in Appendix A attached hereto.*

GW has agreed with OP and the community to respect the existing plan boundaries and carry them forward in the new plan. No change or expansion would be considered for the life of the plan.

4. *New development on campus resulting in additional density or change in use shall substantially conform with the approved campus plan, with the exception of minor renovation projects including those necessary to address building code compliance.*

This is the commitment discussed earlier in the development plan section that limits development projects to those specifically identified in the development plan. This commitment is intended to give assurance to the community that there will be no unexpected developments or surprises during the life of the plan.

5. *The University shall notify the Office of Planning, ANC 2A, and the Advisory Committee (established pursuant to Condition 9) of its intent to develop a specific site on campus, following approval of the development proposal by appropriate University committees and the University's Board of Trustees, and prior to preparation of final detailed plans and specifications.*

Through this commitment, GW agrees to inform the city and community of its intent to file any second-stage PUD associated with the plan prior to the creation of building plans. This will allow ample preparation time for review of development projects

6. *The University shall submit a second-stage Planned Unit Development application for each new development the University proposes over the term of the Foggy Bottom Campus Plan: 2006 – 2025. Each application shall include the following:*
 - a. *Demonstration of compliance with applicable provisions of the zoning regulations and the contents of the approved Foggy Bottom Campus Plan: 2006 – 2025;*
 - b. *A showing that the use, height, bulk, and design (including the location of any means of ingress and egress) of the proposed structure is sensitive to and compatible with adjacent and nearby non-University-owned structures and uses;*
 - c. *An indication of any need for, amount of, and proposed locations of interim leased space necessary to accommodate housing and/or activities displaced by construction and/or activities intended to be located permanently in the completed structure;*
 - d. *A report recalculating the University's total FAR within the campus plan boundaries, which shall also be submitted directly to the Office of Zoning and the Zoning Administrator. Information included in the report shall be broken down by zoning district and include the following: existing FAR, FAR under development pursuant to Commission approval, and FAR upon completion of proposed structure;*
 - e. *The most recent Foggy Bottom Campus Plan Compliance Report (as set forth in Condition 24) evidencing compliance with the approved Foggy Bottom Campus Plan: 2006 – 2025, including the most recent reported counts of Foggy Bottom student headcount, Foggy Bottom student full-time equivalent, Foggy Bottom faculty and staff headcount, Foggy Bottom faculty and staff full-time equivalent, full-time Foggy Bottom undergraduate students, on-campus beds, and full-time Foggy Bottom undergraduate students residing in the Foggy Bottom/West End Area outside of the campus plan boundaries;*
 - f. *A progress report on the implementation of the streetscape plan required by Condition 21;*
 - g. *The number of off-street parking spaces within the campus plan boundaries as set forth in Condition 22(b) as of 30 days prior to the application date, including documentation and an explanation of the methods and assumptions used in counting the parking spaces;*
 - h. *A status report on the Transportation Management Program required by Condition 23; and*
 - i. *Demonstration that the project has been presented to the Advisory Committee for consideration.*

Commitment 6 lays out the filing requirements for each future development project. This assists the Zoning Administrator and Zoning Commission in ensuring compliance with the campus plan. It is also intended to maintain transparent implementation of the plan. Subcondition I specifically requires that each project has been to the Advisory Committee, meaning that the group specifically created to monitor campus plan compliance will have reviewed the project and applicable compliance documents prior to the project being submitted to the Zoning Commission

7. *No PUD application filed by the University for second-stage review under the Foggy Bottom Campus Plan: 2006 – 2025 may be granted unless the University is in substantial compliance with Conditions 1-25 set forth herein as demonstrated by the most recently filed Foggy Bottom Campus Plan Compliance Report submitted to the Zoning Administrator. Further, any violation of these Conditions shall be grounds for the denial of any building permit or certificate of occupancy applied for by the University for any University building or use, and may result in the imposition of fines and penalties pursuant to the Civil Enforcement Act, D.C. Code §§ 6-2701 to 6-2723.*

Condition 7 was the final condition of the 2000 plan providing recourse for the Zoning Administrator and Zoning Commission should GW fall out of compliance with any condition of the plan. Should the university be found by the ZA or ZC to be out of compliance with any aspect of the plan, the Commission has the authority to deny or decline hearing any application, and the ZA has the authority to deny building permits and certificates of occupancy until they are deemed to have returned to compliance with the plan.

8. *The University will not purchase additional residentially-zoned properties outside of the Campus Plan boundaries in the Foggy Bottom/West End area (defined as the area bounded by the Potomac River and Rock Creek Park to the west, N Street to the north, 19th Street to the east, and Constitution Avenue to the south) for university use. This commitment would not preclude the purchase of any properties for investment purposes; however, it would restrict the University from purchasing a residentially-zoned property within the above-defined area and changing its use to one limited to the University population. The University shall not include any such investment property in its undergraduate student housing program or otherwise directly refer undergraduate students to any such property.*

This condition is a significant new commitment by the university. It basically prevents GW from purchasing any residential property in the area and using it for university use, including dormitories. As of the date of this report, GW will maintain the ability to invest in property without changing the use

9. *The University will work with community representatives to form an Advisory Committee for the purpose of fostering consistent communication between the University and the Foggy Bottom and West End communities, discussing issues of mutual interest and proposing solutions to problems that exist or arise in implementing the approved Foggy Bottom Campus Plan.*
 - a. *Key functions of the Advisory Committee include:*
 - i. *reviewing the University's compliance reporting;*
 - ii. *working with the Office of the Zoning Administrator to monitor compliance with the conditions of the Foggy Bottom Campus Plan; and*

- ii. reviewing new University proposals to develop sites on the Foggy Bottom Campus.
- b. *Composition, Administrative Procedures & Meeting Format*
 - i. *The Advisory Committee shall consist of ten members: five representatives of the University to be selected by GW and five representatives of the community to be selected by ANC 2A. The ANC shall select no more than three ANC commissioners and shall select at least one member to represent Foggy Bottom and at least one member to represent the West End.*
 - ii. *The quorum for Advisory Committee meetings will be five members.*
 - iii. *The first Advisory Committee meeting shall take place within two months of the adoption of the Campus Plan and include adoption of specific administrative procedures (subject to the terms of this Condition) that govern the operation of the body.*
 - iv. *The Advisory Committee shall schedule quarterly meetings open to the public, and shall keep minutes of each meeting.*
 - v. *Upon request and at least on a semiannual basis, the University will report to the Advisory Committee data relevant to campus planning that includes, but is not limited to: report on student enrollment, planned development projects included in the University's capital program, historic preservation, implementation of the streetscape plan, public space permits, and reports on all conditions and commitments adopted as part of the Campus Plan.*

This commitment is vital for the success of this plan. Community relations have often been strained for the university and this commitment would reopen lines of communication. The Advisory Committee is intended to represent both the university and community and foster discussion and, ideally, resolution of issues prior to any Zoning Commission meetings. The Advisory Committee should review all projects prior to PUD submission and will have access to all compliance review information. The Advisory Committee should work closely with the Office of the Zoning Administrator in monitoring campus plan compliance. While the administrative procedures will be created by the Committee itself, this condition sets the quorum for any meeting at five members so that the absence of either side at the meeting will not prevent the university from fulfilling its commitment.

10. *For the duration of this Plan, Foggy Bottom student headcount shall not exceed 20,000 students, and Foggy Bottom student full-time equivalent shall not exceed 16,553.*
- a. Definition. For the purposes of these Conditions, "Foggy Bottom student headcount" shall be defined as the number of GW students in the "Foggy Bottom/Mount Vernon Campus Total Student Body", minus: study abroad students, continuous enrollment students, students that reside at the Mount Vernon Campus, students that take all of their courses at the Mount Vernon Campus, and Foggy Bottom faculty and staff accounted for pursuant to Condition 11 herein who are also enrolled in one or more courses at the Foggy Bottom campus.*
- b. Calculation of full-time equivalent. For the purposes of these Conditions, "Foggy Bottom student full-time equivalent" shall be determined by assigning a fraction to part-time students included in the Foggy Bottom student headcount number based on the number of credits they are taking compared to a full-time course load and adding the number of full-time students. Currently, the full-time course load for undergraduates is 12 credits, and the full-time course load for graduate and professional students is 9*

- credits. Formulas for determining full-time equivalents may change over the term of the proposed Foggy Bottom Campus Plan depending on program requirements or the restructuring of the academic calendar.*
- c. An audit of the Foggy Bottom student headcount and Foggy Bottom student full-time equivalent reported pursuant to Condition 24 herein shall be conducted in a manner and by a firm previously approved by the Zoning Administrator and the Advisory Committee. The audit shall be completed by January 10 of the year following each report submitted pursuant to Condition 24 herein.*
- All Foggy Bottom student counts shall be reported biannually as specifically set forth in Conditions 24 and 25.*

Condition 10 carries forward the existing limits on student enrollment. It is not contemplated by the university or the city that these numbers will ever be increased on the Foggy Bottom Campus. Subconditions A and B are clarifying language missing from the 2000 Campus Plan. The existing plan limited student enrollment to control the effects of the Foggy Bottom campus on the surrounding neighborhood. Based on this assumption, it is logical and important to count all students living on or traveling to Foggy Bottom Campus to take classes. Conversely, it would not make sense to count anyone not creating an effect on the Foggy Bottom campus toward a student enrollment number designed to limit negative effects.

This condition will create a biannual count measuring enrollment on Foggy Bottom Campus each semester. The definition provided here is intended to count every student having an individual effect on the neighborhood. It starts by including all students at both the Foggy Bottom and Mount Vernon Campuses. It then subtracts any students not affecting the Foggy Bottom Campus including, students studying abroad, students paying the university but not enrolled in any classes, students living at or attending ALL their classes at Mount Vernon Campus, and GW staff taking classes as a benefit of their position. Students taking classes at both Mount Vernon and Foggy Bottom but not living at either are counted in the enrollment number.

Subcondition C requires an independent audit of the enrollment numbers for the fall semester of each year. Fall semester numbers are always higher than the spring semester and therefore would be out of compliance first should enrollment be too high.

- 11.** *For the duration of this Plan, the Foggy Bottom faculty and staff population shall not exceed a total of 12,529 on a headcount basis, and 10,550 on a full-time equivalent basis.*
- a. For the purposes of these Conditions, "Foggy Bottom faculty and staff headcount" shall include: regular full-time faculty and staff; regular part-time faculty and staff; wage account staff that are not Foggy Bottom students accounted for pursuant to Condition 10; temporary part-time faculty (excluding part-time clinical faculty who are not paid employees of the University); and visiting instructional and research faculty. For the purposes of these Conditions, Foggy Bottom faculty and staff shall not include faculty and staff whose primary office locations are not on the Foggy Bottom campus; employees of non-GW owned or controlled entities which are located on the Foggy Bottom campus; and contractors that provide ancillary campus-related service functions who are not employees of the University.*
- b. For the purposes of these Conditions "Foggy Bottom faculty and staff full-time equivalent" shall be determined by assigning a fraction to part-time employees included*

in the Foggy Bottom faculty and staff headcount number based generally on the number of hours worked as compared to the standard full-time 40 hour work week.

This condition brings forward the faculty and staff counts from the 2000 Campus Plan. Due to difficulty distinguishing between the two counts, faculty and other staff have been combined into one number for this plan the total of which is the same as the existing plan. The condition defines the faculty and staff population in a way that attempts to count all employees of the University affecting the campus area similar to the student enrollment count.

12. *For the duration of the Plan, the University shall make available on-campus beds for full-time Foggy Bottom undergraduate students equivalent to 70% of the full-time Foggy Bottom undergraduate student population up to an enrollment of 8,000, plus one bed per full-time Foggy Bottom undergraduate student over 8,000. For the purposes of these Conditions, the term "on-campus beds" shall include beds available to full-time Foggy Bottom undergraduate students in any property in which the University has an ownership, leasehold, or contractual interest, or beds otherwise occupied by full-time Foggy Bottom undergraduate students in fraternities, sororities, or other programs recognized by or affiliated with the University and located within the campus plan boundary. Each report shall be accompanied by supporting documentation and full explanations of methods, assumptions, and sources used to compile information in the report. The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.*

Condition 12 maintains the existing requirement to house the majority of undergraduate students on campus. The university will continue to provide beds for 70% of the first 8,000 undergraduates and one bed for each undergraduate over 8,000. The numbers for full-time undergraduate students is taken from the total student enrollment minus all non-undergraduates and part-time undergraduates. Any university affiliated bed within campus boundaries counts as a bed toward this requirement.

13. *The University shall require all full-time Foggy Bottom freshmen and sophomore students to reside in housing located within the campus plan boundary. The University may exempt from this requirement students who commute (i.e., students who have established permanent residency off-campus prior to enrollment at GW or students who live off-campus with a parent, guardian, or other family member), are married or have children, or have disabilities or religious beliefs inconsistent with residence hall life. The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.*

This condition is brought forward from the 2000 Campus Plan and requires all freshman and sophomores to be housed on-campus.

14. *With respect to the housing of undergraduate students in off-campus properties which the University owns or has an interest in, except as otherwise provided by this Condition:*
- a. *Effective August 31, 2006, GW shall not house undergraduate students in The Hall on Virginia Avenue.*
 - b. *Effective August 31, 2007, GW shall not house undergraduate students in The Aston.*
 - c. *Effective August 31, 2008, GW shall not house undergraduate students in units in Columbia Plaza for which GW maintains certain designation rights as part of GW's undergraduate student housing program, with the exception that juniors and seniors*

referred to Columbia Plaza as part of GW's student housing program prior to August 31, 2008, may continue to reside in their respective units, subject to the rules and guidelines associated with the GW student housing program, until they graduate from GW or are no longer officially affiliated with the University.

- d. Effective July 1, 2016, GW shall not house undergraduate students in City Hall. Notwithstanding the foregoing, the University may offer housing in these off-campus facilities to students who are exempted from living on-campus pursuant to Condition 13 (specifically undergraduate students who are married or have children, or have disabilities or religious beliefs inconsistent with residence hall life). The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.*

This is a significant new condition of the new plan. GW has agreed to phase students out of The Hall on Virginia Avenue, The Aston, and Columbia Plaza over the next two years. The community has continuously raised concerns about the effects of young students on the Foggy Bottom/West End residential areas off campus. This commitment by the University is an important step to lessen the impacts of its students on the surrounding community. The university will maintain the right to use these buildings for faculty or graduate students.

- 15. The University shall maintain a program to provide its students who are eligible to live off-campus with information about housing opportunities outside the Foggy Bottom/West End Area. The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.*

Conditions 15-19 are updated versions of conditions of the 2000 Campus Plan. Each of these commitments will be individually reviewed and monitored by the Advisory Committee at its regular meetings.

- 16. The University shall use disciplinary interventions for acts of misconduct by students living off-campus in the Foggy Bottom/West End Area, even if students are not in properties owned or controlled by the University. The University shall act on incident reports by residents, ANC 2A, community associations, building management, building association boards, University security officers, and police. The University shall maintain an outreach program with neighboring apartment buildings to educate management companies and tenant associations on the University's disciplinary program and its reporting requirements to facilitate effective use of its program. The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.*
- 17. The University shall maintain and publicize a hotline available 24 hours per day, seven days per week to receive calls about student conduct issues and safety and security concerns. The University shall maintain a log of all calls received and all actions taken, including all referrals made. The University shall maintain its Crimes Tips Hotline (presently 994-TIPS), where calls can be made anonymously to a recorded "tip" line. Calls needing a more immediate response shall be directed to the University police (presently 994-6110) 24 hours per day, seven days per week. The University police will aid off-campus complainants in obtaining assistance from the Metropolitan Police Department. Reports of improper off-campus student conduct will also be referred to the appropriate University departments for their attention. The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.*

18. *The University will maintain a mandatory program for its students that will address “good neighbor” issues, educating students about appropriate conduct in the off-campus community. The University’s efforts with respect to this Condition shall be monitored by the Advisory Committee.*
19. *The University shall gather information about the local addresses of the full-time Foggy Bottom undergraduate population. The University shall compile and report the number of full-time Foggy Bottom undergraduate students residing in (1) Foggy Bottom/West End outside the campus boundaries; (2) the District of Columbia outside both the campus boundaries and the Foggy Bottom/West End Area, organized by postal codes; (3) Maryland; and (4) Virginia. This information shall be reported as set forth in Condition 24 herein.*
20. *Prior to public hearings on the Foggy Bottom Campus Plan: 2006 – 2025, the University, in conjunction with the Office of Planning, will initiate a mutually-agreed upon process that provides for the historic designation of the properties identified in this Campus Plan as architecturally or historically significant and that also accommodates the development sites identified in the Plan.*

This is the new commitment specifically discussed in the previous section. The result of this commitment is intended to be a new potential historic district defined and agreed to by Historic Preservation and the University.

21. *The University shall prepare a detailed streetscape plan applicable to the entire Foggy Bottom campus. The plan shall include, among other elements, a discussion of the installation of sign pylons and street signage, landscaping, lighting and street furniture. The streetscape plan shall be developed with input from with the Office of Planning and the Department of Transportation. A proposed draft streetscape plan will be submitted to the Zoning Commission prior to public hearings on the Foggy Bottom Campus Plan: 2006 – 2025.*

GW is currently working with DDQT and OP to create a comprehensive streetscape plan for the campus. The plan will address all campus streets and pedestrian ways and offer guidance for future developments and campus improvements. The plan should be submitted to the Zoning Commission for review prior to the public hearing on this Campus Plan

22. *The University shall implement the following measures to minimize adverse impacts associated with parking and traffic:*
 - a. *Support of Mass Transit: The University shall maintain the Metrocheck program offered by the Washington Metropolitan Area Transportation Authority (WMATA) to allow employees to pay for public transportation costs on a pre-tax basis. The University shall maintain an introduction to public transportation program for incoming students that includes provision of WMATA’s “SmarTrip” cards to incoming students. The University will work with WMATA to schedule SmarTrip “carding events” at various locations around campus to provide additional information about public transportation to the University community. In the event these programs are discontinued over the term of the campus plan, the University will work to identify alternative programs to support the goal of encouraging mass transit ridership.*

- b. **Parking:** *The University shall continue to provide at least 2,800 off-street parking spaces, including proposed spaces to be dedicated for university use on Square 54 and all University-owned parking spaces on Square 122 (specifically including the parking lot and garage spaces at Old Main located at 1922 F Street, NW). The number of off-street parking spaces required to be provided may be increased in any subsequent further processing order pursuant to this plan if necessary to mitigate the adverse impact of the approved uses on the University's parking resources. The University shall monitor its utilization of University parking facilities to determine usage patterns and conduct an ongoing assessment of parking needs*
- c. **Notice:** *The University shall notify all affected property owners or occupants in a timely manner of the occurrence of any temporary street closing necessary to accommodate University-related functions.*
- d. **Student Vehicles:** *The University, through its Office of Parking Services, shall maintain an accurate record of the license plate numbers of motor vehicles kept by students in University parking facilities, to be updated annually at the beginning of each Fall semester. The University shall direct students to register their vehicles in the District of Columbia, or obtain a reciprocity sticker.*

Condition 22 is updated language from the 2000 Campus Plan. The university should continue to support mass transit and work to limit traffic and parking impacts. OP and GW have discussed the possibility of including a maximum number of university parking spaces in addition to the minimum count in order to limit the total number of trips possible to campus, but there is not enough information at this time to determine the proper number or the effects of such a limit.

23. *The University shall maintain, and periodically update, its comprehensive transportation management plan addressing traffic and parking associated with events on campus that are attended by a significant number of persons not normally associated with the University and the campus. The transportation management plan shall include the following:*
- a. *Measures to schedule events at times that reduce conflicts with other traffic and other demands for parking.*
 - b. *Measures to discourage travel by private automobile and encourage travel by public transportation.*
 - c. *Measures to encourage persons who drive to park in commercial or University Parking garages.*
 - d. *Any other specific measures to address parking demand and decrease vehicular traffic in the surrounding Foggy Bottom/West End Area.*
- The transportation management plan shall be submitted to and reviewed by the Advisory Committee on an annual basis as set forth in Condition 22.*

This condition is also carried forward from the 2000 Campus Plan.

24. *On November 20 of each year beginning in 2006, the University will file a Foggy Bottom Campus Plan Compliance Report with the Zoning Commission, Zoning Administrator, Office of Planning, ANC 2A, and the Advisory Committee. The Foggy Bottom Campus Plan Compliance Report shall contain the following information, reported as of the University Census Date unless otherwise noted:*

- a. *Current fall and previous spring semester Foggy Bottom student headcount and Foggy Bottom student full-time equivalent in accordance with Condition 10.*
- b. *Current fall and previous spring semester Foggy Bottom faculty & staff headcount and Foggy Bottom faculty & staff full-time equivalent in accordance with Condition 11.*
- c. *Data in connection with the on-campus undergraduate student housing requirement set forth in Condition 12, specifically:*
 - i. *Current fall and previous spring full-time Foggy Bottom undergraduate students. For purposes of these Conditions, "full-time Foggy Bottom undergraduate students" shall be defined as the number of students in the "Foggy Bottom/Mount Vernon Campus Total Student Body" minus graduate students, first professionals (JDs and MDs), undergraduates taking fewer than 12 credit hours at the Foggy Bottom campus, non-degree students, full-time undergraduate study abroad students, undergraduate continuous enrollment students, and full-time undergraduate students that reside at the Mount Vernon Campus.*
 - ii. *The number of on-campus beds available to full-time Foggy Bottom undergraduate students;*
 - iii. *The number of on-campus beds occupied by full-time Foggy Bottom undergraduate students;*
 - iv. *The number of off-campus University-supplied beds within the Foggy Bottom/West End Area, defined as the area bounded by the Potomac River and Rock Creek Park to the west, N Street to the north, 19th Street to the east, and Constitution Avenue to the south;*
 - v. *The number of off-campus University-supplied beds within the Foggy Bottom/West End Area occupied by full-time Foggy Bottom undergraduate students;*
 - vi. *The number of off-campus University-supplied beds outside the Foggy Bottom/West End Area;*
 - vii. *The number of off-campus University-supplied beds outside the Foggy Bottom/West End Area occupied by full-time Foggy Bottom undergraduate students.*

All data shall be reported for each individual semester and also as an average of the reported fall and spring semesters. Compliance with the on-campus undergraduate student housing requirement set forth in Condition 12 shall be based upon the average of the reported fall and spring semesters until the fall 2010 semester or until the completion and occupancy of the next GW residence hall project proposed in accordance with the Foggy Bottom or Mount Vernon Campus Plans, whichever event first occurs. After the occurrence of the aforementioned event and for the remainder of the term of this Plan, compliance with the on-campus undergraduate student housing requirement set forth in Condition 12 shall be based upon the data reported for each individual semester.
- d. *Information evidencing compliance with Condition 15.*
- e. *Information evidencing compliance with Condition 16.*
- f. *Information evidencing compliance with Condition 17.*
- g. *Information evidencing compliance with Condition 18.*
- h. *Updated address information in accordance with Condition 19.*
- i. *Current inventory of University-owned parking spaces and other evidence of compliance with Condition 22(b).*
- j. *Information evidencing compliance with Condition 23.*

Each report shall be accompanied by supporting documentation and full explanations of methods, assumptions, and sources used to compile information in the report.

Condition 24 requires a comprehensive compliance document at the middle of each fall semester. This document is intended to go to all involved parties and should document compliance with all applicable campus plan conditions. It is intended that this document will be reviewed by the Advisory Committee at the end of each year and used by the Zoning Administrator for compliance review. In addition, the latest version of this document will be included with each second stage PUD submittal.

25. *On April 15 of each year beginning in 2007, the University will file an Interim Foggy Bottom Campus Plan Compliance Report with the Zoning Administrator and the Advisory Committee. The Interim Foggy Bottom Campus Plan Compliance Report shall contain the following information, reported as of the University Census date unless otherwise noted:*
 - a. *Current spring and previous fall semester Foggy Bottom student headcount and Foggy Bottom student full-time equivalent in accordance with Condition 10.*
 - b. *A copy of the audit report of the previous fall semester Foggy Bottom student headcount and Foggy Bottom student full-time equivalent conducted pursuant to condition 10(c) herein.*
 - c. *Current spring and previous fall semester Foggy Bottom faculty and staff headcount and Foggy Bottom faculty and staff full-time equivalent in accordance with Condition 11.*
 - d. *Data in connection with the on-campus undergraduate student housing requirement set forth in Condition 12, specifically:*
 - i. *Current spring and previous fall full-time Foggy Bottom undergraduate students. For purposes of these Conditions, "full-time Foggy Bottom undergraduate students" shall be defined as the number of students in the Foggy Bottom/Mount Vernon campus total student body minus all graduate students, all first professionals (JDs and MDs), all undergraduates taking fewer than 12 credit hours at the Foggy Bottom campus, non-degree students, full-time undergraduate study abroad students, undergraduate continuous enrollment students, and full-time undergraduate students that reside at the Mount Vernon Campus.*
 - ii. *The number of on-campus beds available to full-time Foggy Bottom undergraduate students;*
 - iii. *The number of on-campus beds occupied by full-time Foggy Bottom undergraduate students;*
 - iv. *The number of off-campus University-supplied beds within the Foggy Bottom/West End Area, defined as the area bounded by the Potomac River and Rock Creek Park to the west, N Street to the north, 19th Street to the east, and Constitution Avenue to the south;*
 - v. *The number of off-campus University-supplied beds within the Foggy Bottom/West End Area occupied by full-time Foggy Bottom undergraduate students;*
 - vi. *The number of off-campus University-supplied beds outside the Foggy Bottom/West End Area;*

- vii. *The number of off-campus University-supplied beds outside the Foggy Bottom/West End Area occupied by full-time Foggy Bottom undergraduate students.*

All data shall be reported for each individual semester and also as an average of the spring and fall reported semesters. Compliance with the on-campus undergraduate student housing requirement set forth in Condition 12 shall be based upon the average of the reported spring and fall semesters until the fall 2010 semester or until the completion and occupancy of the next GW residence hall project proposed in accordance with the Foggy Bottom or Mount Vernon Campus Plans, whichever event first occurs.⁴ After the occurrence of the aforementioned event and for the remainder of the term of this Plan, compliance with the on-campus undergraduate student housing requirement set forth in Condition 12 shall be based upon the data reported for each individual semester.

Each report shall be accompanied by supporting documentation and full explanations of methods, assumptions, and sources used to compile information in the report.

This final condition requires the university to provide a spring semester compliance document. This document reports the enrollment, employee, and bed numbers for the spring semester, but does not require updates of other conditions that are not likely to change mid-year. This report also adds the independent audit that is required by condition 10. This audit will independently confirm the enrollment numbers from the previous fall semester.

IMPLEMENTATION PROCESS

One of the most significant aspects of this plan is that, because of the comprehensive level of planning that has occurred, GW has committed to the city and the neighborhood that no development will take place outside of the proposed sites. The 2000 Campus Plan allows further processing applications, which means that developments in general consistency with the plan could be submitted by the University even if not previously identified. The proposal with this plan would be for the university to limit all new development on campus to the sites identified on the development plan at the heights and densities agreed to. The university is, in effect, backing up its plan and the process that created it with a commitment to abide by it and follow it. The best way to accomplish this in a manner consistent with the city's interests is through a comprehensive two-stage Planned Unit Development for the campus. The first stage would include the entire campus, identifying the development sites, massing, and use and would have an expiration date equal to the life of the campus plan. Each future development project would be brought forward as a second stage PUD and reviewed individually in light of the overall campus plan. This is not unlike the process approved by the Commission for the Washington Hospital Center.

This is the only process that will adequately provide certainty to all sides that the plan will be fulfilled. First, it assures the Zoning Commission and the community that the development plan approved, including sites not identified for development, will be adhered to by the University for the life of the plan. Any proposed development not identified would not be able to move forward simply as further processing determined to be consistent with the plan, but would be a modification to the campus-wide first-stage PUD that, since linked to the plan, would require a complete change of the campus plan. Second, the PUD process grants the university the assurance of conceptual density, height, and use approval that allow them to commit to such a comprehensive and detailed plan for an extended period of time. In addition, the use of the PUD process will allow the Commission to avoid straight-rezonings of

campus property. Any zone changes would be subject to the campus plan approved first-stage PUD and not open to any other uses or buildings. Moreover, the PUD process provides the additional benefits of design review and amenity discussion at the time of submission of each project as a second-stage PUD. As one of the major concepts of this plan is compatibility with the existing campus character as well as the historic and residential properties in and around campus, it is important to have a strong design review process guided by the plan and enforced through the PUD process. The PUD process provides the opportunity for the university to make and keep commitments that are vital to rebuilding trust with the surrounding community.

DENSITY CHANGES

As stated above, the development plan attempts to limit GW to the maximum development appropriate for the campus and surrounding area. The plan has limited density in some areas and concentrated it in others resulting in a plan that should both protect and enhance the existing campus and larger area. The resulting development plan will meet the needs of the Foggy Bottom Campus for the foreseeable future and allow the university to make additional commitments such as removing undergraduates from university-owned off campus housing. The benefits of the plan, however, can only be achieved through two changes to the existing matter-of-right situation.

PUD-Related Map Amendment

The concentration of height and density in the center of campus leaves unused density around the periphery of campus near neighboring residential areas below what would be allowed in the R-5-D zone, however moving the resulting mass in the core is not consistent with the underlying zoning. For this reason, the plan suggests a PUD-related zoning change for nine of the development sites. Seven in the central core and one at 20th and H Street would be rezoned to C-3-C. One property along Pennsylvania Avenue would be rezoned to C-4. The change would allow height and bulk that would not otherwise be allowed in the R-5-D zone. The result of these rezonings will be an extension of the existing C-3-C zoning along Pennsylvania Avenue into the core of campus. It will not affect non-university owned properties and will allow the retention of a lower density buffer area between central campus and the surrounding neighborhoods. The proposed changes are shown in Figure 3.

Text Amendment

The second change that is necessary to accomplish the proposed plan is a change to the existing language of Section 210.3 of the zoning regulations. Currently, the regulations limit the total FAR for a campus located on property zoned R-5-C, R-5-D, and R-5-E to 3.5. The development plan proposed through this application, which is intended to represent the long-term development maximum for the university, includes 3.65 FAR on the residentially zoned portions of campus. This change requires an amendment to Section 210.3 to allow a number larger than 3.5 on R-5-D zoned property. There are currently no other university properties in the city with R-5-D or R-5-E zoning with the exception of two existing dorms on the Howard University campus zoned R-5-E.

The purpose of the existing language of Section 210.3 is to allow flexibility of development on a campus while minimizing impacts on residential areas. This plan already accomplishes both of these goals and takes the campus plan even further by defining exactly where development will and will not take place. The protections afforded by 210.3 are actually exceeded by the new plan by pushing bulk to the center of campus when it would be allowed anywhere in the campus boundaries under 210.3. For these reasons, it makes sense to loosen the restrictions of 210.3 in exchange for a sensitive and thoughtful plan that exceeds the intent of the campus plan regulations.

The proposed language would be as follows:

210.3 *In R-1, R-2, R-3, R-4, R-5-A, and R-5-B Districts, the maximum bulk requirements normally applicable in the Districts may be increased for specific buildings or structures; provided, that the total bulk of all buildings and structures on the campus shall not exceed the gross floor area prescribed for the R-5-B District. In all other Residence Districts, similar bulk increases may also be permitted: provided, that the total bulk of all buildings and structures on the campus shall not exceed a gross floor area of 3.5 in the R-5-C District and 4.0 in the R-5-D and R-5-E Districts the gross floor area prescribed for the R-5-D district. Because of permissive increases as applicable to normal bulk requirements in the low-density districts regulated by this title, it is the intent of this subsection to prevent unreasonable campus expansion into improved low-density districts.*

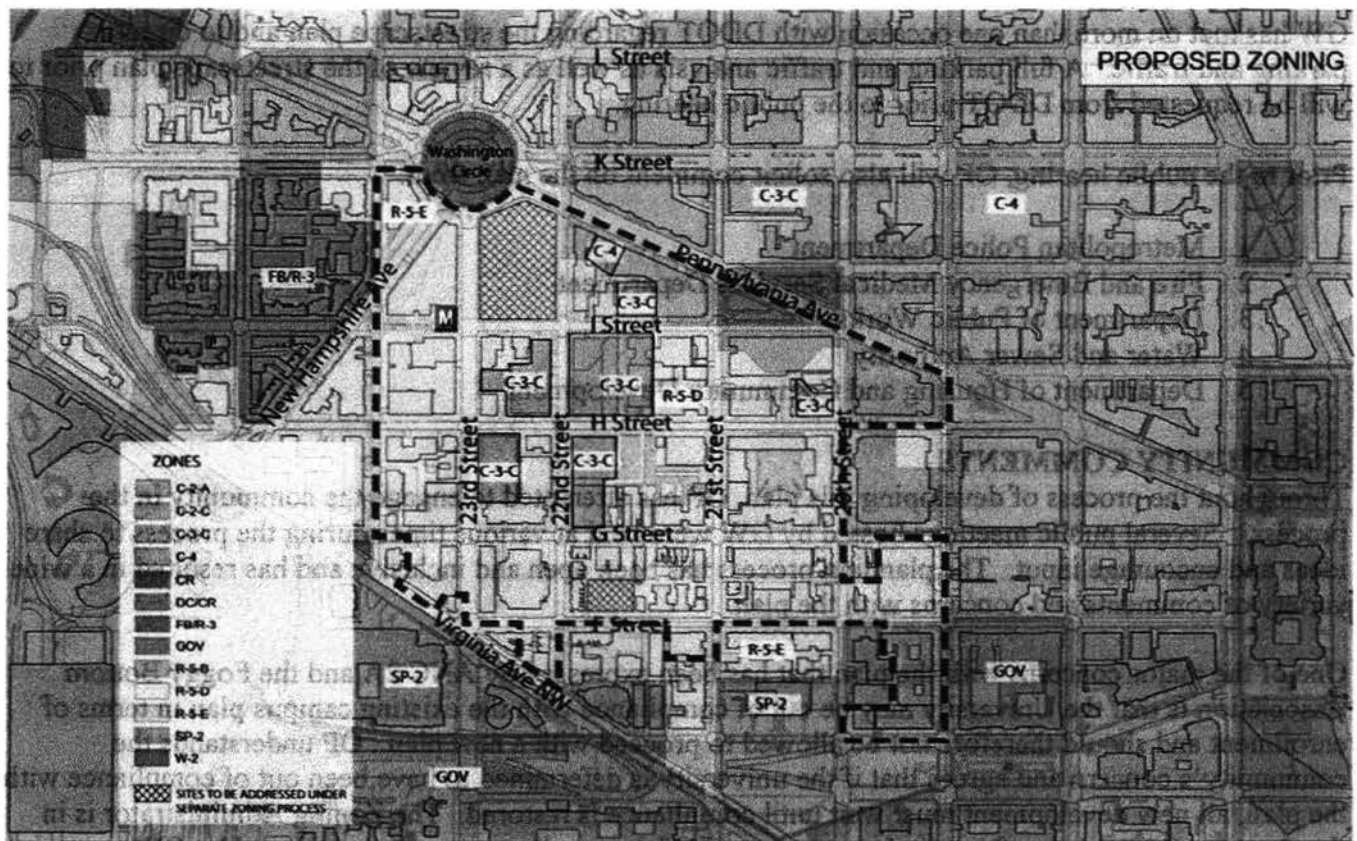


Figure 3: Proposed Zoning

COMPREHENSIVE PLAN

The Comprehensive Plan Generalized Land Use Map identifies the campus area as institutional use. This use category is designed for college, university, and other institutional use. The uses and buildings described by this plan are completely compatible and consistent with the institutional use category. The Pennsylvania Avenue frontage is identified as high density commercial allowing for the highest density commercial uses along this corridor and specifically, the north side of Square 54.

The Land Use element of the Comprehensive Plan does not specifically address George Washington University growth, however, this plan does support policies protecting established residential neighborhoods as well as policies supporting economic development. The submitted plan is an effort to accomplish both of those goals. Section 1340 of the Ward 2 Plan states that “The development plan of [George Washington University] should not adversely impact surrounding, adjacent residential areas, but rather should improve such neighborhoods by improved landscaping, better lighting, and enhanced community policing.” The proposed plan attempts to meet all of these requirements through a community sensitive development plan, a comprehensive streetscape plan, and commitments that address student behavior and community policing. The Ward 2 Plan also specifically discusses the protection of historic resources and this plan furthers this goal through the formation of a potential historic district.

AGENCY COMMENTS

GW has met on more than one occasion with DDOT regarding the streetscape plan and to discuss parking and traffic. A full parking and traffic analysis as well as a review of the streetscape plan prior to will be requested from DDOT prior to the public hearing.

Prior to the public hearing, OP will also solicit comment on the plan from:

1. Metropolitan Police Department
2. Fire and Emergency Medical Services Department
3. Department of Public Works
4. Water and Sewer Authority
5. Department of Housing and Community Development

COMMUNITY COMMENTS

Throughout the process of developing this plan, OP has attempted to engage the community in the process. Several public meetings hosted by GW were held at various times during the process to share ideas and encourage input. The planning process has been open and inclusive and has resulted in a wide variety of comments and concerns with the plan.

One of the major concerns with the plan that has been expressed by ANC 2A and the Foggy Bottom Association is that the University may be out of compliance with the existing campus plan in terms of enrollment and should therefore not be allowed to proceed with a new plan. OP understands the community’s concern and agrees that if the university is determined to have been out of compliance with the plan, all new development must wait until compliance is restored. The Zoning Administrator is in the process of contracting for an independent audit of the enrollment numbers reported by GW to ensure compliance with the 2000 Campus Plan. This process is intended to be complete prior to the public hearing on this plan. In the meantime, however, OP has no reason to believe that the University is out of compliance or reporting inaccurate numbers.

The intent of the student headcount is to account for every student living on or traveling to the Foggy Bottom campus for classes. The method used by the University is to count all registered GW students and then subtract those without classes on the Foggy Bottom Campus. With the possible exception of students attending both Mount Vernon and Foggy Bottom campuses, the numbers reported by GW do exactly that. Even changing the numbers to include the Mount Vernon students in the Foggy Bottom numbers does not raise the enrollment count to the 20,000 limit. Based on the Zoning Commission’s

previous acceptance of this methodology for counting enrollment, OP believes that the proposed plan can be setdown for public hearing and the issue of non-compliance revisited, with data from the audit, at the public hearing.

The West End Citizen's Association has submitted a letter questioning whether submission and setdown of the new plan should wait for approval and publication of the proposed text amendment. OP is not aware of any reason why the two issues cannot be heard concurrently. As with the PUD submission, the plan and text amendment are interrelated and each dependent upon the other. The plan provides the basis and reasoning for the text amendment while the amendment provides the ability to implement the plan. Hearing one without the other would neither make sense, nor be efficient use of the Commission's or community's time.

Many constructive comments have been received throughout the process that have been incorporated in the plan. OP expects others to arise during the public hearing stage of this plan. One of the most common general comments that OP hears is a basic lack of trust in the community regarding the university (and even OP). The Office of Planning has made every attempt throughout this process to be as open and available and include as many voices as possible. In working with the university, OP is convinced that GW is working in good faith to provide a plan that will not only meet their needs, but be an honest attempt to address the needs of the community and open a dialogue to continue addressing concerns in the future. OP is happy to continue working with both the university and community to facilitate and improve this dialogue. OP believes that the commitments and detail of this plan can help to improve this relationship and promote a more constructive resolution of disagreements.

RECOMMENDATION

OP recommends that the applications be setdown for public hearing. Prior to the public hearing, the following items should be made available to the Commission:

1. Draft Potential Historic District language and proposed boundary map.
2. Draft Streetscape Plan reviewed by both OP and DDOT.
3. Updated Campus Plan documents containing revised commitment language from this report.
4. Audit results from the Office of the Zoning Administrator regarding student enrollment.

Attachment Revised campus plan conditions

Figures 2 & 3 drawn by EE&K Architects

EM/tp

**FOGGY BOTTOM CAMPUS PLAN 2006 – 2025
PROPOSED CONDITIONS**

GENERAL CONDITIONS

1. The Applicant's proposed campus plan replaces the George Washington University Foggy Bottom Campus Plan: Years 2000 through 2009. This campus plan is approved until June 30, 2025, subject to the following conditions, or until such time prior to June 30, 2025 as the Zoning Commission determines that conditions warrant submission of a campus plan amendment or an updated campus plan.
2. The Applicant will not initiate litigation challenging Zoning Commission action which approves the Foggy Bottom Campus Plan: 2006 – 2025 as submitted by the University, including these Conditions 1-25, so long as such approval is not contingent on additional conditions to which the Applicant has not specifically agreed
3. The campus plan boundary for the Foggy Bottom Campus Plan: 2006 – 2025 shall remain consistent with the campus plan boundary established by the Board of Zoning Adjustment with respect to the Foggy Bottom Campus Plan: Years 2000 through 2009 (Order No. 16553-1). The properties included within the Foggy Bottom Campus Plan boundary are depicted in Exhibit I of the proposed Foggy Bottom Campus Plan: 2006 – 2025 and are specifically identified and listed in Appendix A attached hereto.
4. New development on campus resulting in additional density or change in use shall substantially conform with the approved campus plan, with the exception of minor renovation projects including those necessary to address building code compliance
5. The University shall notify the Office of Planning, ANC 2A, and the Advisory Committee (established pursuant to Condition 9) of its intent to develop a specific site on campus, following approval of the development proposal by appropriate University committees and the University's Board of Trustees, and prior to preparation of final detailed plans and specifications.
6. The University shall submit a second-stage Planned Unit Development application for each new development the University proposes over the term of the Foggy Bottom Campus Plan: 2006 – 2025. Each application shall include the following:
 - a. Demonstration of compliance with applicable provisions of the zoning regulations and the contents of the approved Foggy Bottom Campus Plan: 2006 – 2025,

- b. A showing that the use, height, bulk, and design (including the location of any means of ingress and egress) of the proposed structure is sensitive to and compatible with adjacent and nearby non-University-owned structures and uses,
 - c. An indication of any need for, amount of, and proposed locations of interim leased space necessary to accommodate housing and/or activities displaced by construction and/or activities intended to be located permanently in the completed structure;
 - d. A report recalculating the University's total FAR within the campus plan boundaries, which shall also be submitted directly to the Office of Zoning and the Zoning Administrator. Information included in the report shall be broken down by zoning district and include the following: existing FAR, FAR under development pursuant to Commission approval, and FAR upon completion of proposed structure,
 - e. The most recent Foggy Bottom Campus Plan Compliance Report (as set forth in Condition 24) evidencing compliance with the approved Foggy Bottom Campus Plan: 2006 – 2025, including the most recent reported counts of Foggy Bottom student headcount, Foggy Bottom student full-time equivalent, Foggy Bottom faculty and staff headcount, Foggy Bottom faculty and staff full-time equivalent, full-time Foggy Bottom undergraduate students, on-campus beds, and full-time Foggy Bottom undergraduate students residing in the Foggy Bottom/West End Area outside of the campus plan boundaries;
 - f. A progress report on the implementation of the streetscape plan required by Condition 21;
 - g. The number of off-street parking spaces within the campus plan boundaries as set forth in Condition 22(b) as of 30 days prior to the application date, including documentation and an explanation of the methods and assumptions used in counting the parking spaces;
 - h. A status report on the Transportation Management Program required by Condition 23; and
 - 1. Demonstration that the project has been presented to the Advisory Committee for consideration.
7. No PUD application filed by the University for second-stage review under the Foggy Bottom Campus Plan: 2006 – 2025 may be granted unless the University is in substantial compliance with Conditions 1-25 set forth herein as demonstrated by the most recently filed Foggy Bottom Campus Plan Compliance Report submitted to the Zoning Administrator. Further, any violation of these Conditions

shall be grounds for the denial of any building permit or certificate of occupancy applied for by the University for any University building or use, and may result in the imposition of fines and penalties pursuant to the Civil Enforcement Act, D.C. Code §§ 6-2701 to 6-2723.

8. The University will not purchase additional residentially-zoned properties outside of the Campus Plan boundaries in the Foggy Bottom/West End area (defined as the area bounded by the Potomac River and Rock Creek Park to the west, N Street to the north, 19th Street to the east, and Constitution Avenue to the south) for university use. This commitment would not preclude the purchase of any properties for investment purposes, however, it would restrict the University from purchasing a residentially-zoned property within the above-defined area and changing its use to one limited to the University population. The University shall not include any such investment property in its undergraduate student housing program or otherwise directly refer undergraduate students to any such property.

ADVISORY COMMITTEE

9. The University will work with community representatives to form an Advisory Committee for the purpose of fostering consistent communication between the University and the Foggy Bottom and West End communities, discussing issues of mutual interest and proposing solutions to problems that exist or arise in implementing the approved Foggy Bottom Campus Plan.
 - a. Key functions of the Advisory Committee include:
 - i. reviewing the University's compliance reporting;
 - ii. working with the Office of the Zoning Administrator to monitor compliance with the conditions of the Foggy Bottom Campus Plan, and
 - iii. reviewing new University proposals to develop sites on the Foggy Bottom Campus.
 - b. Composition, Administrative Procedures & Meeting Format
 - i. The Advisory Committee shall consist of ten members: five representatives of the University to be selected by GW and five representatives of the community to be selected by ANC 2A. The ANC shall select no more than three ANC commissioners and shall select at least one member to represent Foggy Bottom and at least one member to represent the West End.
 - ii. The quorum for Advisory Committee meetings will be five members.
 - iii. The first Advisory Committee meeting shall take place within two months of the adoption of the Campus Plan and include adoption of specific administrative procedures (subject to the terms of this Condition) that govern the operation of the body.
 - iv. The Advisory Committee shall schedule quarterly meetings open to the public, and shall keep minutes of each meeting.

- v. Upon request and at least on a semiannual basis, the University will report to the Advisory Committee data relevant to campus planning that includes, but is not limited to report on student enrollment, planned development projects included in the University's capital program, historic preservation, implementation of the streetscape plan, public space permits, and reports on all conditions and commitments adopted as part of the Campus Plan.

FOGGY BOTTOM CAMPUS POPULATION

- 10. For the duration of this Plan, Foggy Bottom student headcount shall not exceed 20,000 students, and Foggy Bottom student full-time equivalent shall not exceed 16,553.
 - a. **Definition.** For the purposes of these Conditions, "Foggy Bottom student headcount" shall be defined as the number of GW students in the "Foggy Bottom/Mount Vernon Campus Total Student Body"¹, minus: study abroad students, continuous enrollment students, students that reside at the Mount Vernon Campus, students that take all of their courses at the Mount Vernon Campus, and Foggy Bottom faculty and staff accounted for pursuant to Condition 11 herein who are also enrolled in one or more courses at the Foggy Bottom campus.
 - b. **Calculation of full-time equivalent.** For the purposes of these Conditions, "Foggy Bottom student full-time equivalent" shall be determined by assigning a fraction to part-time students included in the Foggy Bottom student headcount number based on the number of credits they are taking compared to a full-time course load and adding the number of full-time students. Currently, the full-time course load for undergraduates is 12 credits, and the full-time course load for graduate and professional students is 9 credits. Formulas for determining full-time equivalents may change over the term of the proposed Foggy Bottom Campus Plan depending on program requirements or the restructuring of the academic calendar.
 - c. **An audit of the Foggy Bottom student headcount and Foggy Bottom student full-time equivalent reported pursuant to Condition 24 herein shall be conducted in a manner and by a firm previously approved by the Zoning Administrator and the Advisory Committee. The audit shall be completed by January 10 of the year following each report submitted pursuant to Condition 24 herein.**

All Foggy Bottom student counts shall be reported biannually as specifically set forth in Conditions 24 and 25.

¹ The "Foggy Bottom/Mount Vernon Campus Total Student Body" is compiled by the GW Office of Institutional Research (OIR) and is currently reported on the OIR online "GW Factbook" available at www.gwu.edu/~ire/

11. For the duration of this Plan, the Foggy Bottom faculty and staff population shall not exceed a total of 12,529 on a headcount basis, and 10,550 on a full-time equivalent basis.
 - a. For the purposes of these Conditions, "Foggy Bottom faculty and staff headcount" shall include: regular full-time faculty and staff; regular part-time faculty and staff; wage account staff that are not Foggy Bottom students accounted for pursuant to Condition 10; temporary part-time faculty (excluding part-time clinical faculty who are not paid employees of the University), and visiting instructional and research faculty. For the purposes of these Conditions, Foggy Bottom faculty and staff shall not include faculty and staff whose primary office locations are not on the Foggy Bottom campus; employees of non-GW owned or controlled entities which are located on the Foggy Bottom campus, and contractors that provide ancillary campus-related service functions who are not employees of the University².
 - b. For the purposes of these Conditions "Foggy Bottom faculty and staff full-time equivalent" shall be determined by assigning a fraction to part-time employees included in the Foggy Bottom faculty and staff headcount number based generally on the number of hours worked as compared to the standard full-time 40 hour work week.

ON-CAMPUS UNDERGRADUATE STUDENT HOUSING

12. For the duration of the Plan, the University shall make available on-campus beds for full-time Foggy Bottom undergraduate students equivalent to 70% of the full-time Foggy Bottom undergraduate student population up to an enrollment of 8,000, plus one bed per full-time Foggy Bottom undergraduate student over 8,000. For the purposes of these Conditions, the term "on-campus beds" shall include beds available to full-time Foggy Bottom undergraduate students in any property in which the University has an ownership, leasehold, or contractual interest, or beds otherwise occupied by full-time Foggy Bottom undergraduate students in fraternities, sororities, or other programs recognized by or affiliated with the University and located within the campus plan boundary. Each report shall be accompanied by supporting documentation and full explanations of methods, assumptions, and sources used to compile information in the report. The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.
13. The University shall require all full-time Foggy Bottom freshmen and sophomore students to reside in housing located within the campus plan boundary. The University may exempt from this requirement students who commute (i.e.,

² Non-GW employee contractors have historically provided certain campus-related services (including managing and staffing the GW bookstore, mailroom services, and housekeeping management services). This population is currently estimated to include approximately 400 workers. The employment of these individuals is not under the control or management of GW, and thus their numbers cannot be tracked and reported with the level of specificity and accuracy required under these Conditions.

students who have established permanent residency off-campus prior to enrollment at GW or students who live off-campus with a parent, guardian, or other family member), are married or have children, or have disabilities or religious beliefs inconsistent with residence hall life. The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.

OFF-CAMPUS STUDENT HOUSING & STUDENT CONDUCT ISSUES

14. With respect to the housing of undergraduate students in off-campus properties which the University owns or has an interest in, except as otherwise provided by this Condition:
 - a Effective August 31, 2006, GW shall not house undergraduate students in The Hall on Virginia Avenue.
 - b Effective August 31, 2007, GW shall not house undergraduate students in The Aston
 - c Effective August 31, 2008, GW shall not house undergraduate students in units in Columbia Plaza for which GW maintains certain designation rights as part of GW's undergraduate student housing program, with the exception that juniors and seniors referred to Columbia Plaza as part of GW's student housing program prior to August 31, 2008, may continue to reside in their respective units, subject to the rules and guidelines associated with the GW student housing program, until they graduate from GW or are no longer officially affiliated with the University
 - d Effective July 1, 2016, GW shall not house undergraduate students in City Hall.

Notwithstanding the foregoing, the University may offer housing in these off-campus facilities to students who are exempted from living on-campus pursuant to Condition 13 (specifically undergraduate students who are married or have children, or have disabilities or religious beliefs inconsistent with residence hall life). The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.

15. The University shall maintain a program to provide its students who are eligible to live off-campus with information about housing opportunities outside the Foggy Bottom/West End Area. The University's efforts with respect to this Condition shall be monitored by the Advisory Committee
16. The University shall use disciplinary interventions for acts of misconduct by students living off-campus in the Foggy Bottom/West End Area, even if students are not in properties owned or controlled by the University. The University shall act on incident reports by residents, ANC 2A, community associations, building management, building association boards, University security officers, and police. The University shall maintain an outreach program with neighboring apartment buildings to educate management companies and tenant associations on the University's disciplinary program and its reporting requirements to facilitate

effective use of its program. The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.

17. The University shall maintain and publicize a hotline available 24 hours per day, seven days per week to receive calls about student conduct issues and safety and security concerns. The University shall maintain a log of all calls received and all actions taken, including all referrals made. The University shall maintain its Crimes Tips Hotline (presently 994-TIPS), where calls can be made anonymously to a recorded "tip" line. Calls needing a more immediate response shall be directed to the University police (presently 994-6110) 24 hours per day, seven days per week. The University police will aid off-campus complainants in obtaining assistance from the Metropolitan Police Department. Reports of improper off-campus student conduct will also be referred to the appropriate University departments for their attention. The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.
18. The University will maintain a mandatory program for its students that will address "good neighbor" issues, educating students about appropriate conduct in the off-campus community. The University's efforts with respect to this Condition shall be monitored by the Advisory Committee.
19. The University shall gather information about the local addresses of the full-time Foggy Bottom undergraduate population. The University shall compile and report the number of full-time Foggy Bottom undergraduate students residing in (1) Foggy Bottom/West End outside the campus boundaries; (2) the District of Columbia outside both the campus boundaries and the Foggy Bottom/West End Area, organized by postal codes; (3) Maryland; and (4) Virginia. This information shall be reported as set forth in Condition 24 herein.

HISTORIC PRESERVATION & STREETSCAPE PLANS

20. Prior to public hearings on the Foggy Bottom Campus Plan: 2006 – 2025, the University, in conjunction with the Office of Planning, will initiate a mutually-agreed upon process that provides for the historic designation of the properties identified in this Campus Plan as architecturally or historically significant and that also accommodates the development sites identified in the Plan.
21. The University shall prepare a detailed streetscape plan applicable to the entire Foggy Bottom campus. The plan shall include, among other elements, a discussion of the installation of sign pylons and street signage, landscaping, lighting and street furniture. The streetscape plan shall be developed with input from with the Office of Planning and the Department of Transportation. A proposed draft streetscape plan will be submitted to the Zoning Commission prior to public hearings on the Foggy Bottom Campus Plan: 2006 – 2025.

PARKING & TRAFFIC

22. The University shall implement the following measures to minimize adverse impacts associated with parking and traffic.
- a. Support of Mass Transit The University shall maintain the Metrocheck program offered by the Washington Metropolitan Area Transportation Authority (WMATA) to allow employees to pay for public transportation costs on a pre-tax basis. The University shall maintain an introduction to public transportation program for incoming students that includes provision of WMATA's "SmarTrip" cards to incoming students. The University will work with WMATA to schedule SmarTrip "carding events" at various locations around campus to provide additional information about public transportation to the University community. In the event these programs are discontinued over the term of the campus plan, the University will work to identify alternative programs to support the goal of encouraging mass transit ridership.
 - b. Parking: The University shall continue to provide at least 2,800 off-street parking spaces, including proposed spaces to be dedicated for university use on Square 54 and all University-owned parking spaces on Square 122 (specifically including the parking lot and garage spaces at Old Main located at 1922 F Street, NW). The number of off-street parking spaces required to be provided may be increased in any subsequent further processing order pursuant to this plan if necessary to mitigate the adverse impact of the approved uses on the University's parking resources. The University shall monitor its utilization of University parking facilities to determine usage patterns and conduct an ongoing assessment of parking needs.
 - c. Notice: The University shall notify all affected property owners or occupants in a timely manner of the occurrence of any temporary street closing necessary to accommodate University-related functions.
 - d. Student Vehicles: The University, through its Office of Parking Services, shall maintain an accurate record of the license plate numbers of motor vehicles kept by students in University parking facilities, to be updated annually at the beginning of each Fall semester. The University shall direct students to register their vehicles in the District of Columbia, or obtain a reciprocity sticker.
23. The University shall maintain, and periodically update, its comprehensive transportation management plan addressing traffic and parking associated with events on campus that are attended by a significant number of persons not normally associated with the University and the campus. The transportation management plan shall include the following.

- a. Measures to schedule events at times that reduce conflicts with other traffic and other demands for parking.
- b. Measures to discourage travel by private automobile and encourage travel by public transportation.
- c. Measures to encourage persons who drive to park in commercial or University Parking garages.
- d. Any other specific measures to address parking demand and decrease vehicular traffic in the surrounding Foggy Bottom/West End Area.

The transportation management plan shall be submitted to and reviewed by the Advisory Committee on an annual basis as set forth in Condition 22.

REPORTING & COMPLIANCE REVIEW

24. On November 20 of each year beginning in 2006, the University will file a Foggy Bottom Campus Plan Compliance Report with the Zoning Commission, Zoning Administrator, Office of Planning, ANC 2A, and the Advisory Committee. The Foggy Bottom Campus Plan Compliance Report shall contain the following information, reported as of the University Census Date unless otherwise noted³:
- a. Current fall and previous spring semester Foggy Bottom student headcount and Foggy Bottom student full-time equivalent in accordance with Condition 10.
 - b. Current fall and previous spring semester Foggy Bottom faculty & staff headcount and Foggy Bottom faculty & staff full-time equivalent in accordance with Condition 11.
 - c. Data in connection with the on-campus undergraduate student housing requirement set forth in Condition 12, specifically:
 - i. Current fall and previous spring full-time Foggy Bottom undergraduate students. For purposes of these Conditions, "full-time Foggy Bottom undergraduate students" shall be defined as the number of students in the "Foggy Bottom/Mount Vernon Campus Total Student Body"¹ minus graduate students, first professionals (JDs and MDs), undergraduates taking fewer than 12

³ "Census Date" is the date when the University makes its official count of student enrollment. Currently the University Census Date occurs at the end of the sixth week of classes each semester. In the event the University Census Date is modified due to changes in the academic calendar or other necessary administrative policy modifications, upon 60 days notice to the Zoning Commission, Zoning Administrator, Office of Planning, ANC 2A, and the Advisory Committee, the reporting date may be changed accordingly to accommodate the new Census Date.

- credit hours at the Foggy Bottom campus, non-degree students, full-time undergraduate study abroad students, undergraduate continuous enrollment students, and full-time undergraduate students that reside at the Mount Vernon Campus
- ii. The number of on-campus beds available to full-time Foggy Bottom undergraduate students;
 - iii. The number of on-campus beds occupied by full-time Foggy Bottom undergraduate students;
 - iv. The number of off-campus University-supplied beds within the Foggy Bottom/West End Area, defined as the area bounded by the Potomac River and Rock Creek Park to the west, N Street to the north, 19th Street to the east, and Constitution Avenue to the south,
 - v. The number of off-campus University-supplied beds within the Foggy Bottom/West End Area occupied by full-time Foggy Bottom undergraduate students,
 - vi. The number of off-campus University-supplied beds outside the Foggy Bottom/West End Area;
 - vii. The number of off-campus University-supplied beds outside the Foggy Bottom/West End Area occupied by full-time Foggy Bottom undergraduate students.

All data shall be reported for each individual semester and also as an average of the reported fall and spring semesters. Compliance with the on-campus undergraduate student housing requirement set forth in Condition 12 shall be based upon the average of the reported fall and spring semesters until the fall 2010 semester or until the completion and occupancy of the next GW residence hall project proposed in accordance with the Foggy Bottom or Mount Vernon Campus Plans, whichever event first occurs.⁴ After the occurrence of the aforementioned event and for the remainder of the term of this Plan, compliance with the on-campus undergraduate student housing requirement set forth in Condition 12 shall be based upon the data reported for each individual semester

- d. Information evidencing compliance with Condition 15.
- e. Information evidencing compliance with Condition 16
- f. Information evidencing compliance with Condition 17.
- g. Information evidencing compliance with Condition 18.
- h. Updated address information in accordance with Condition 19

⁴ It is contemplated that the next GW residence hall to be completed and occupied will be the project proposed pursuant to the joint DCPS/GW School Without Walls (Square 80) PUD which was filed on April 3, 2006 and is targeted for occupancy in fall 2009

- i. Current inventory of University-owned parking spaces and other evidence of compliance with Condition 22(b)
- j. Information evidencing compliance with Condition 23.

Each report shall be accompanied by supporting documentation and full explanations of methods, assumptions, and sources used to compile information in the report

25. On April 15 of each year beginning in 2007, the University will file an Interim Foggy Bottom Campus Plan Compliance Report with the Zoning Administrator and the Advisory Committee. The Interim Foggy Bottom Campus Plan Compliance Report shall contain the following information, reported as of the University Census date unless otherwise noted:
- a. Current spring and previous fall semester Foggy Bottom student headcount and Foggy Bottom student full-time equivalent in accordance with Condition 10.
 - b. A copy of the audit report of the previous fall semester Foggy Bottom student headcount and Foggy Bottom student full-time equivalent conducted pursuant to condition 10(c) herein
 - c. Current spring and previous fall semester Foggy Bottom faculty and staff headcount and Foggy Bottom faculty and staff full-time equivalent in accordance with Condition 11
 - d. Data in connection with the on-campus undergraduate student housing requirement set forth in Condition 12, specifically:
 - i. Current spring and previous fall full-time Foggy Bottom undergraduate students. For purposes of these Conditions, "full-time Foggy Bottom undergraduate students" shall be defined as the number of students in the Foggy Bottom/Mount Vernon campus total student body minus all graduate students, all first professionals (JDs and MDs), all undergraduates taking fewer than 12 credit hours at the Foggy Bottom campus, non-degree students, full-time undergraduate study abroad students, undergraduate continuous enrollment students, and full-time undergraduate students that reside at the Mount Vernon Campus..
 - ii. The number of on-campus beds available to full-time Foggy Bottom undergraduate students;
 - iii. The number of on-campus beds occupied by full-time Foggy Bottom undergraduate students,
 - iv. The number of off-campus University-supplied beds within the Foggy Bottom/West End Area, defined as the area bounded by the Potomac River and Rock Creek Park to the west, N Street to the north, 19th Street to the east, and Constitution Avenue to the south;

- v. The number of off-campus University-supplied beds within the Foggy Bottom/West End Area occupied by full-time Foggy Bottom undergraduate students;
- vi. The number of off-campus University-supplied beds outside the Foggy Bottom/West End Area;
- vii. The number of off-campus University-supplied beds outside the Foggy Bottom/West End Area occupied by full-time Foggy Bottom undergraduate students

All data shall be reported for each individual semester and also as an average of the spring and fall reported semesters. Compliance with the on-campus undergraduate student housing requirement set forth in Condition 12 shall be based upon the average of the reported spring and fall semesters until the fall 2010 semester or until the completion and occupancy of the next GW residence hall project proposed in accordance with the Foggy Bottom or Mount Vernon Campus Plans, whichever event first occurs.⁴ After the occurrence of the aforementioned event and for the remainder of the term of this Plan, compliance with the on-campus undergraduate student housing requirement set forth in Condition 12 shall be based upon the data reported for each individual semester.

Each report shall be accompanied by supporting documentation and full explanations of methods, assumptions, and sources used to compile information in the report.