



CONSORTIUM OF UNIVERSITIES OF THE WASHINGTON METROPOLITAN AREA

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December 29, 2008

Mr. Anthony Hood, Chairman
District of Columbia Zoning Commission
441 4th Street, NW, Suite 210 South
Washington, DC 20001

Re: Supplementary Comments regarding Case No. 08-06-7
(Comprehensive Zoning Regulations Rewrite: Campus/Institutional)

Dear Chairman Hood:

At the public hearing on the above referenced case on December 11, it was suggested that the record would be open until December 29 to receive comments on some of the issues raised at that hearing. Please accept this submission as supplementary comments to the testimony that the Consortium of Universities offered at that hearing.

Specifically, the Consortium would strongly reject a change to the current formula for calculating Gross Floor Area (GFA) either in general or for the more specific purpose of establishing the 300,000 square foot threshold after which an institution is required to file a campus plan. Our reasons for opposing such a change are as follows:

1) *GFA is a standard term defined by the Zoning Regulations*

Universities and other large institutions have used GFA as defined in the Zoning Regulations for many years. As the Office of Planning (OP) was devising the new Campus Plan regulations and holding meetings with stakeholders, the definition of GFA was never raised or discussed. For purposes of consistency, the Commission should not consider changing the term now. Even if the purpose of the change was only to address when an institution meets the 300,000 square foot threshold proposed by OP, creating a new and essentially *ad hoc* definition for such a narrow purpose would fly in the face of uniform zoning regulations.

2) *Any new GFA definition would be costly and cause widespread confusion among regulated landowners.*

In practice a new GFA definition would undermine the existing campus plans based on the long-used and well understood current GFA formula. A new definition would require a whole new set of assumptions for campus plans and would be extremely disruptive. At the very least, such a change would require all existing campuses with a campus plan to reevaluate their GFA. At worst, every building across the city would have to be reevaluating creating a headache for the landowners as well as the Zoning Commission.

CASE NO.

EXHIBIT NO.

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- 3) *There is no evidence that current GFA definition poses a hazard serious enough to require such a far-reaching change.*

No evidence was put into the record at the December 11 public hearing by either OP or the public witnesses that would justify such a dramatic change in current procedures. No direct testimony was submitted concerning any adverse impacts of underground space. Indeed, Travis Parker representing OP testified that there are no current records of underground space. As stated above, even with strongly compelling evidence, it would be highly impractical to attempt to identify such spaces in order to create an accurate record. Without stated need for such a change, the Zoning Commission should avoid taking such a radical step.

For all of these reasons, the Commission should reject the idea of changing the existing definition of GFA as applied to campus plans.

The Commission wishes to thank the Commission for giving it the opportunity to submit its views for the record on this important land use issue.

Sincerely,



Sally Kram
Director of Government and Public Affairs
Consortium of Universities



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Sally Kern

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Supplementary Submission from Consortium of
Universities on Case # 08-06-7.

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