

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF PLANNING



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MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Travis Parker, Zoning Review Project Manager *TP*

DATE: November 19, 2008

SUBJECT: Public Hearing Report for ZC #08-06-7
Proposed Amendments to Zoning Regulations – Campus/Institutional

ZONING COMMISSION
District of Columbia

CASE NO. 08-06-7

EXHIBIT NO. 4

I. ZONING REVIEW PROCESS

The 2006 Comprehensive Plan for the District of Columbia states that “The Zoning Regulations...need substantial revision and reorganization, ranging from new definitions to updated development and design standards and even new Zones” (Comprehensive Plan, §2504.2). It goes on to note that “a major revision to the Zoning Regulations is planned for 2007-2009” (ibid). OP has designed a three-year process to produce recommended changes to update, clarify and simplify the current Regulations.

Regulations are currently being reviewed by subject area, with up to twenty subject areas to be covered in the next few years. Each subject area will be reviewed in consultation with a public working group that will discuss issues identified in the Comprehensive Plan as well as issues arising from the existing Zoning Regulations. Recommend changes are then forwarded to the 24-member Task Force for further review and input. Finally, recommendations for each subject area are made available for public review including a hearing before the Zoning Commission. After the conclusion of public review for all subject areas, OP will work with the Office of the Attorney General to draft zoning language to reflect the proposed policy changes.

Drafting the language for all subject areas at once, rather than for each topic, allows for the overlap between different subject areas and establishes a cohesive writing style and format. The recommendations for the first three subject areas – height, parking, and loading – were written as draft zoning language, rather than recommended text changes or zoning policies. The remainder of the subject areas, including retail strategy, will come forward to the Commission as recommended changes and policies. After all topics have been heard by the Commission, those policies will be unified into one proposed zoning text.

II. CAMPUS/INSTITUTIONAL SUBJECT AREA PROCESS

The Campus/Institutional Working Group held its first of three meetings on July 1, 2008. The group was made up of institutional representatives, zoning professionals, and members of neighborhood organizations. Group members represented many areas of the city. OP

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highlighted for the group the Comprehensive Plan's main goal for institutional uses: to proactively "plan, design, and manage" institutional use on large sites within residential zones. Using this goal as a starting point, and with the assistance of best practices research, the group helped OP identify weaknesses in the existing regulations and discuss new strategies. The discussion of the working group helped draw out what characteristics are necessary for successful institutional zoning control. The extensive comments and insights provided by the working group were critical to forming our recommendations.

Following the last working group meeting, the preliminary recommendations were sent to the Taskforce for additional review and comment at the September 24 Taskforce meeting. The next draft of the recommendations were posted online and made available for review and comment by the public.

III. BACKGROUND OF RECOMMENDATIONS

A. Input

This report describes strategies for improving the approval process for large institutional uses in residential zones. Four main sources contributed to the identification of issues and their solutions:

- The policies and action items of the Comprehensive Plan;
- The Zoning Commission's direction that the Zoning Review should result in greater clarity, ease of use and relevance;
- Comments of working group participants;
- A current practices survey of other cities that regulate institutions through zoning.

The result of that process was a list of recommendations addressing a range of issues including the process and structure of zoning approval for institutions. The initial list of recommendations was developed by OP staff with input from the working group and is detailed below in section IV. For each topic the existing practice is described, followed by a description of the issues identified with the current regulation. OP's recommendation to address the issue is listed next, as well as an analysis of how the proposal would be an improvement. Finally, any other remaining issues pertinent to that topic are explained.

The proposals listed below, and others to be considered by future working groups, attempt to achieve the goals of the Comprehensive Plan and address the concerns expressed by members of the working group and Task Force. The recommendations also seek to meet the general goals of the Zoning Review by providing clarity, ease of use and relevance for the regulations.

B. The Comprehensive Plan

The Comprehensive Plan contains direction in establishing workable regulations relating to Institutional uses. Policy LU-3.2.3 charges the DC Office of Planning with the following task:

“Ensure that large non-profits, service organizations, private schools, seminaries, colleges and universities, and other institutional uses that occupy large sites within residential areas are planned, designed, and managed in a way that minimizes objectionable impacts on adjacent communities. The zoning regulations should ensure that the expansion of these uses is not permitted if the quality of life in adjacent residential areas is significantly adversely affected.”

This policy became the fundamental guidance for this working group and the impetus for the resulting recommendations. Based on this guidance, the recommendations attempt to proactively “plan, design, and manage” institutional use on large sites within residential zones. Moreover, we have attempted to clarify the process as well as standardize it between differing types of institutional uses.

Most of the remainder of Comprehensive Plan guidance for institutional uses is directed specifically at colleges and universities. Several policies in the Education element (See EDU-1 & EDU-3) deal with specific impacts of universities, both positive and negative. The Historic Preservation element (See HP-2) discusses the historic resources as they relate to campus planning. Finally, several of the Area elements discuss specific campuses and their relation to the surrounding areas.

C. Best Practices

In order to inform our recommendations, OP conducted a current practices survey of over two dozen cities and their zoning regulations pertaining to institutional uses. Sample cities studied include Austin, Chicago, Boston, Oakland, San Francisco, Seattle, and Phoenix. While not exhaustive, the survey provided insights into what techniques other cities are using to address issues similar to those faced in the District. Boston, for example, has developed an Institutional Master Plan system that describes an institution’s existing facilities, long-range planning goals, and proposed projects. St. Petersburg has institutional center zones with institutional master plans. Other efforts around the country focus on identifying the impacts of institutional uses on neighboring areas. The recommendations presented in this report attempt to draw inspiration from these other practices, but also refine and build on the techniques already in place in the zoning regulations.

IV. CAMPUS/INSTITUTIONAL RECOMMENDATIONS

The basis of these recommendations is the standardized and proactive regulation of large institutional uses in residential zones. In attempting to regulate these uses, it is necessary to identify the possible impacts and the process for reviewing them. The recommendations fall into three areas: consistent regulation, threshold for review, and review requirements.

For the purposes of this discussion, institutional uses include organizations designed to serve social, educational, or religious purposes including: colleges and universities, hospitals, private schools, churches, etc. Public schools are not included in the definition of institutional uses because they are approved through a separate public process. There is also some question about whether chanceries will be regulated separately from other institutional uses. Due to issues involving federal law, chanceries are not a subject of the current recommendations and will be reviewed separately.

1. Consistent Regulation of Institutional Uses

Existing Practice

Currently, there are separate regulations for different institutional uses in Residential zones. Colleges and universities are all subject to campus plan review regardless of size. Hospitals are matter of right in the R-4 and R-5 zones or in other R zones if part of a university. Private schools require special exception approval regardless of size or location. Churches are matter of right at any size, and chanceries generally require BZA review.

Issues

Existing regulations are very uniform based on the *type* of use, but have little relation to the size or intensity of the use. A school with 16 students has the same requirements as one with 1600, while two buildings with the same number of users and similar impacts can have vastly different requirements.

Recommendation #1

All institutional uses should be subject to the same regulatory structure, with requirements divided by the size and impact of the use rather than the type of use.

Analysis

The existing regulations provide no consistency in the regulation of large institutional uses in residential zones. The requirements are based on what a use is called rather than how big it is or the breadth of its impacts. The proposed change would provide a way to better address the range of impacts associated with institutional uses in a uniform way.

Under this scheme, all residentially zoned institutional uses of a similar size would be regulated in a similar way. In addition to universities, this would include uses like private schools, churches, chanceries, and hospitals. The subsequent recommendations provide the details of regulation, but the base concept is an important one. Impacts on residential neighbors are more closely related to the number of users, the number of cars and trips, the size of the building, the noise and visual intrusion, and other physical issues, than they are related to the type of institution involved.

2. Consolidation of Use Lists

Existing Practice

As stated earlier, separate institutional uses have separate requirements. Only colleges and universities are required or allowed to submit campus plans, while some other institutional uses require special exception and some are allowed as a matter of right.

Issues

If Recommendation #1 is adopted as policy, the regulations will have to provide a size threshold when uses require a campus plan, when they require a special exception, and when they are allowed as a matter of right.

Recommendation #2

Institutional uses in residential zones with 300,000 square feet of total gross floor area or more would be required to submit a campus master plan before they can be established or expanded. Campus master plans will be valid for a period of ten years, during which time all construction and uses approved in the plan may proceed without further Commission review. Institutional uses below 300,000 square feet of gross floor area and above the matter-of-right threshold for the district would be required to submit *either* a single campus master plan that would govern its development for a ten year period *OR* submit a separate special exception application for every new development project. For this size institutional use, special exceptions would be required for every development project where campus master plans are not in place.

The matter-of-right threshold for institutional uses in residential zones would be set for each zone. Institutional uses in more than one building located within a contiguous campus-like area would be treated as a single use for the purposes of the determination of size.

Analysis

OP has conducted a preliminary study of the institutions in D.C. to determine an appropriate baseline threshold for consideration as a “large” institution, and hence, the need for the more thorough review of a campus master plan. The preliminary study gathered gross floor area (GFA), total square footage (acreage), and total users information for over 130 institutions in the District. Through this work it became clear that GFA was both the easiest data to collect accurately and provided the most reliable measure of intensity and impacts.

Based on information gathered of all of the institutional uses located in the District, there are distinctions in GFA between those large and complex institutions which naturally entail impacts upon their neighbors and those smaller, less-intensive institutional uses which should be regulated in a similar, if not as detailed and exhaustive, form.

Based on OP research, the most appropriate dividing line would be 300,000 square feet based on what seemed to be a natural dividing line between those very large and complex institutional uses representing full multi-building campuses, and those slightly smaller, like most private schools, that require review but do not have the same degree of activity and complexity.

This size threshold would ensure that all major universities in D.C. would be subject to a campus master plan requirement along with the largest hospital complexes, while allowing all other institutional uses, like private schools, the choice of a special exception or campus master plan.

The study has identified 11 campuses which eclipse the recommended size threshold of greater than 300,000 GFA in residentially-zoned areas are:

Colleges & Universities

American University
Catholic University
Gallaudet University
George Washington University
Georgetown University
Howard University
Trinity Washington University
University of DC

Hospitals & Medical Centers

Providence Hospital
Sibley Hospital
Washington Hospital Center

Research performed on jurisdictions similar to the District of Columbia revealed that other cities often require the provision of a campus master plan above a certain physical size threshold. Further, working group members expressed interest in comprehensively addressing impacts through a campus master plan procedure based on certain size metrics

such as GFA, acreage, users, and so on. Additionally, some have expressed agreement that GFA could serve as a strong, simple indicator of intensity for large institutional uses.

This serves to further the policies of the Comprehensive Plan. Policy LU-3.2.3 states: "Ensure that institutional uses on large residential tracts are planned, designed and managed in a way that minimizes impacts." Action PROS-4.2.A states: "Conduct a study of institutional land in the city to determine the appropriateness of existing zoning designations." Based on information gathered of all of the institutional uses located in the District, OP sees distinctions in GFA between those large and complex institutions which naturally entail impacts upon their neighbors and those smaller, less-intensive institutional uses which should be regulated in a similar, if not as detailed and exhaustive, form.

Remaining Issues

An important distinction that will result from this recommendation will be the definition of a campus when multiple institutions abut each other. In drafting the language, OP will attempt to define the organizational and physical characteristics that separate or combine the campuses of different entities for the purposes of the threshold measurement.

3. Campus Plan Review

Existing Practice

The only existing requirements for a campus plan (currently limited to colleges and universities) include the submission of a facilities plan and maximum GFA calculations based on the zone district. Beyond these items, there is no requirement to address or mitigate impacts other than the blanket statement that the use "shall be located so that it is not likely to become objectionable to neighboring property because of noise, traffic, number of students, or other objectionable conditions."

Issues

Generally, there are a series of limitations placed upon colleges and universities through the campus plan process but not required by zoning, including but not limited to:

- Time periods
- Limited expansion beyond boundaries
- Limited existing campus uses beyond boundaries
- Historic Preservation
- Advisory committee
- Streetscape Plan
- Student, faculty caps
- Minimum on-campus beds

- Underclassmen housing
- Discouragement of student housing near campus
- Monitoring of off-campus student activity
- Minimizing traffic impacts
- Traffic/parking management plan
- Second-stage review of development (further processing)

Current regulations do not address impacts of institutional uses comprehensively or consistently. There is currently no standard format for addressing the impacts of institutional campuses. While there are common issues that arise in campus planning, both for local DC campuses and nationally, the Zoning Regulations provide no guidance on the range of impacts that should be addressed. Under the existing system, responsibility falls on community members, the institution, OP, and the Zoning Commission to anticipate and identify the impacts to be addressed for each individual institution, which can result in uneven and unpredictable regulation.

Recommendation #3

Create Campus Master Plan criteria for large institutional uses that address the full range of possible impacts associated with these uses. The Campus Master Plan would have to identify all new and existing buildings and uses and establish the maximum size and intensity of each. For certain uses, such as universities and hospitals, overall minimums and maximum may need to be established, such as staff caps and minimum or maximum parking requirements. In addition, the Commission may consider granting flexibility from matter of right standards based upon the particulars needs of the institution, or the public benefits that will arise from the use.

More specifically, OP recommends that Campus Master Plans contain the following items, which large institutional use applicants must address. These requirements are more fully described in the analysis section below.

Comprehensive requirements:

1. Background/History

2. Mission/Guiding Principles

3. Facilities Plan:

- **Existing conditions:**
 - **Form (FAR, height, bulk, etc.)**
 - **Building use**
- **Proposed conditions:**
 - **Future needs/capital improvements (10 yrs.)**
 - **Form (FAR, height, bulk, etc.)**
 - **Building use**

4. Neighborhood Context

- **Student/Employee count**
- **Edge conditions/Border transitions, Economic implications**
- **Community relations**
- **Community benefits**
- **Identification/Mitigation of impacts**
 - **Noise, lighting, special events, etc.**

5. Comprehensive Accessibility

- **Transportation demand management plan**
- **Multi-modal transportation plan**
- **Parking, loading study**

6. Conservation

- **Historic considerations**
- **Sustainability considerations**
- **Environmental impacts**

7. Landscape/Open Space

8. Streetscape Treatment

- **Signage/Wayfinding**

Analysis

The Campus Master Plan as proposed would allow for predictable, comprehensive, and consistent discussion of impacts. Institutions preparing a Campus Master Plan would have to address a series of subjects which could potentially impact the surrounding community. The depth with which the applicant would be expected to address these subjects would be dependent upon several factors, including the degree to which the applicant proposes changes to the existing conditions. Presumably, every campus master plan would not require the same length and depth of explanation for each requirement, but would be based upon the unique characteristics of the applicant's proposal. However, the campus master plan process, in necessitating consideration of each of the proposed requirements, ensures that a base level of consideration is made by the applicant for the consideration of the community, OP, and the Zoning Commission.

The following paragraphs provide a brief description of the type of information required by each section of the Campus Master Plan:

- The *background/history* section would describe the temporal context of the request in relation to the applicant's prior requests, a description of the campus master planning process, and the responsibility of the various stakeholders in that process, including the applicant, OP, and the community.
- The *mission/guiding principles* section would describe the need for the proposal with relation to the larger, long-term goals of the institutional use.
- The *facilities plan* section would contain a description of the existing conditions on the campus, the proposed conditions on the campus after proposed alterations

are made (in the case of use category change), and anticipated needs of the institution ten years in the future.

- The *neighborhood context* section would contain information relating to the relationship between an institution and its surroundings. The first portion of this section would discuss student and/or employee counts. 'Edge conditions/border transitions, and economic implications' would speak to the positive and negative impacts associated with any development along the borders with the larger community, and how it may hinder or spur larger economic development or preservation goals of the local neighborhood. 'Community relations' refers to existing and proposed systems for interaction between the institution and the community, especially for the resolution of community concerns. The 'Identification/mitigation of impacts' requirement would contain information on unique impacts which the institution's proposal may have upon the neighboring community which should be addressed or offset in an appropriate manner. This would include discussion of, and possibly limitations on, noise, events, lighting, and other potentially objectionable aspects of the institution
- The *comprehensive accessibility* section requires a comprehensive transportation, parking, and loading plan. This would also include a discussion of alternative transportation options for expected visitors, staff, students, patients, etc. that could take the form of a Transportation Demand Management Plan or multi-modal transportation plan.
- The *conservation* section addresses all the existing resources contained onsite, both historical and environmental in nature, and requires that the applicant discuss how these resources would be treated. Discussion of environmental impacts could include: air quality, water quality, soil quality, energy use, conservation, sustainability measures, etc.
- The *landscape/open space* section would contain a description of treatment to that area surrounding existing and proposed structures within the Campus Master Plan over the given 10 year period;
- The *streetscape treatment* section would be expected to discuss treatment of the public spaces within the campus including sidewalks and curbside areas. This could also include provisions for signage and wayfinding on the campus.

As mentioned above, almost none of these aspects are currently required for campus plans under the existing regulations. A survey of other jurisdictions that regulate campus plans revealed that these components may be of use in regulating the full range of impacts common to all large institutional uses. These measures were proposed before the Working Group at the final meeting and were received favorably. In fact, the final list of proposed components was based upon numerous Working Group comments which expressed the sentiment that all impacts relating to large institutional uses should be regulated predictably, comprehensively, and consistently.

Further, the recommendations in this section echo the instruction put forth in the Comprehensive Plan. Policy LU-3.2.3 states: "*Ensure that institutional uses on large*

residential tracts are planned, designed and managed in a way that minimizes impacts.” The recommendation supports this policy by working to guarantee that locally-appropriate institutional development takes place.

Policy LU-3.2.2 states: “*Support continued ‘corporate citizenship’ among the city’s large institutional uses.*” The recommendations fulfill this policy by requiring large institutional uses to provide a description of how they will satisfy the community’s needs in the ‘community benefits’ section of the campus master plan proposal.

Policy HP-2.2.3 states: “*Support public agency facility plans and campus plans as an opportunity to evaluate potential historic resources, promote their designation, and develop management plans for their protection and use.*” The recommendations require that large institutional uses provide explanation of applicable historic considerations in the “conservation” section of the campus master plan proposal.

4. Second Stage Review of Campus Plans

Existing Practice

Per Section 210.4 of the current regulations, colleges and universities require further processing for additions that have already been reviewed as a part of the campus plan, regardless of the size or impacts relating to that addition.

Issues

Current regulations uniformly require two reviews for all projects subject to a campus plan regardless of the size or potential impacts. While there may be a need for a second review of large new buildings or additions, there are clearly small scale projects for which one detailed review, through the campus planning process, would be sufficient. In addition, there is currently no flexibility for truly minor projects that are impossible to anticipate in a campus plan.

Recommendation #4

Campus master plan requirements should contain a threshold structure for when unanticipated projects require review or update of the campus plans.

Additions or use changes not anticipated in the plan would require an update to the plan unless they contain less than 3,500 square feet of GFA.

Review of campus master plan conditions should take place for each building permit or certificate of occupancy application.

Analysis

This recommendation, coupled with the previous one, anticipates a higher degree of planning up front. Institutions participating in the campus plan process will have the incentive to identify potential projects and comprehensively plan their campus. All proposed additions over the period of the campus plan would be reviewed up front so that those anticipated and reviewed under the campus master plan could proceed later as a matter of right.

The Campus Master Plan as proposed would allow for predictable, comprehensive, and consistent discussion of impacts. Institutions preparing a Campus Master Plan would have to address a series of subjects which could potentially impact to the surrounding community. The depth with which the applicant would be expected to address these subjects would be dependent upon several factors, including the degree to which the applicant proposed changes to the existing conditions. Presumably, every campus master plan would not require the same length and depth of explanation for each subject area, but would be based upon the unique characteristics of the applicant's proposal. However, the campus master plan process, in necessitating consideration of each of the proposed subject areas, ensures that a base level of consideration is made by the applicant for the review of the community, OP, and the Zoning Commission.

This recommendation satisfies several issues. First, the creation of regulations which recognize the need for consistent and comprehensive impact mitigation as a part of the campus planning process would remove much of the need for second stage review. Second, the recommendation removes the unnecessary existing standard requiring two reviews for projects of any size.

Third, by allowing for minor flexibility from the approved plan in small cases, the recommendations recognize the reality of the unpredictability of running large institutions. A new stairwell, new locker rooms, ADA compliance, required medical improvements, utility changes, and countless other small projects can add insignificant amounts of GFA to an existing building but be impossible to plan for over a ten year period. The proposed campus master plan process would allow for the unanticipated construction or change of use for up to 3,500 GFA to account for these situations. Therefore, large institutions can plan their development 10 years into the future with the flexibility to handle the unpredictable without a complete revision of the plan. The 3,500 maximum GFA figure gives large institutions flexibility while ensuring the surrounding community that larger unanticipated additions or use changes would still require a change to the plan and public review.

Further, working group comments reflect the belief that second stage review is burdensome for many institutions that rely on flexible regulations in order to adapt to sometimes rapidly changing conditions as those that exist in the education, medical, and research sectors. Other working group members expressed the concern that second stage

review is a vital aspect of protecting neighborhoods from impacts. The recommendations seek to recognize both perspectives in offering large institutions with a degree of flexibility while preserving the second stage review process for unanticipated changes.

An important concern of neighborhoods is the potential for enforcement of campus plan conditions that currently exists at the second stage review process. The absence of second stage review would necessitate the periodic review of conditions by someone other than the Zoning Commission. OP recommends that building permits and certificates of occupancy for approved projects within campus plans be conditioned on a favorable review of campus plan conditions by the Zoning Administrator.

The recommendations in this section promote the implementation of the Comprehensive Plan. Policy LU-3.2.3 states: *"Ensure that institutional uses on large residential tracts are planned, designed and managed in a way that minimizes impacts."* The recommendations support this policy by working to guarantee that locally-appropriate additions and use changes can occur in large institutions, without introducing potentially negative impacts to the surrounding community.

5. Special Exception Review

Existing Practice

Section 206 of the current regulations, which deals exclusively with private schools, requires that the applicant satisfy a series of criteria, among them: "[the private school] shall be located so that it is not likely to become objectionable to adjoining and nearby property because of noise, traffic, number of students, or otherwise objectionable conditions." The condition of all other special exceptions is that approval will not "tend to affect adversely, the use of neighboring property."

Issues

While it is generally accepted that the special exception process is useful for identifying impacts that private school uses may have on residential neighborhoods, currently this special exception is limited to private schools and there is no defined basis by which to measure the impacts. For instance, many community members have expressed displeasure regarding the vague language contained in Section 206; there is little objective guidance offered by the phrase: "so that it is not likely to become objectionable." Responsibility falls on community members and OP to anticipate the impacts to be addressed for each individual institution, which can result in uneven and unpredictable regulation.

Recommendation #5

Create special exception criteria for institutional uses that address the full range of possible impacts associated with these uses.

OP recommends that applicants be required to address the following components; many of the comprehensive requirements included below are typically provided (but not required) under the current regulations, with the notable inclusion of a facilities plan and compulsory conservation and landscape description:

Core requirements:

1. Facilities Plan:

- **Existing conditions:**
 - **Form (FAR, Height, Bulk, etc.)**
 - **Building use**
- **Proposed conditions:**
 - **Future needs/capital improvements**
 - **Form (FAR, Height, Bulk, etc.)**
 - **Building use**

2. Neighborhood Context

- **Student/Faculty count**
- **Edge conditions/Border transitions, Economic implications**
- **Community relations**
- **Community benefits**
- **Identification/Mitigation of impacts**
 - **Noise, lighting, special events, etc.**

3. Comprehensive Accessibility

- **Transportation demand management plan**
- **Multi-modal transportation plan**
- **Parking, loading study**

4. Conservation

- **Historic considerations**
- **Sustainability considerations**
- **Environmental impacts**

5. Landscape/Open Space

Analysis

The third recommendation in this document identifies a series of requirements which large institutions must satisfy in a Campus Master Plan. In many instances, the impacts of smaller institutions are just as wide-ranging, if not as pervasive, as those of other larger institutional uses. Therefore, in the interest of consistency and predictability OP recommends that they be regulated within the same comprehensive framework of regulations.

Special exception review will closely resemble campus master plan requirements so as to promote consistent impact mitigation and prevent administrative loopholes. There are a few notable exceptions to the above core requirements, as opposed to the more comprehensive requirements required for Campus Master Plans. The 'Background' and 'Mission' sections would not be required, as these subjects are not as relevant as for larger institutions. Additionally, there is no prescribed timeframe associated with the special exception, it would be established with each application. The 'Streetscape Treatment' section would also not be required.

The recommendations in this section work to promote the instruction put forth in the Comprehensive Plan. Policy LU-3.2.3 states: *"Ensure that institutional uses on large residential tracts are planned, designed and managed in a way that minimizes impacts."* The recommendations support this policy by working to guarantee that locally-appropriate institutional development takes place by requiring institutional uses to satisfy appropriate criteria which will work to negate negative impacts associated with private schools in residential districts.

Policy LU-3.2.2 states: *"Support continued 'corporate citizenship' among the city's large institutional uses."* The recommendations fulfill this policy by requiring institutional uses to provide a description of how they will satisfy the community's needs in the 'Community benefits' section of the core requirements.

6. Ancillary Campus Uses

Existing Practice

Universities can, as part of a campus plan process, include in their campus ancillary uses not traditionally allowed in residential zones. Hospitals and other institutional uses would only be able to accomplish this through a Planned Unit Development.

Issues

Large institutional facilities have the need to allow ancillary office and retail uses as a part of the campus function. These uses should only be allowed in residential zones as a part of a publicly reviewed planning process.

Recommendation #6

Allow ancillary non-residential uses for institutional uses as a part of an approved campus master plan, but not as part of a special exception. Such uses should be limited to less than half of the total GFA of the campus

Analysis

Large hospital complexes often contain medical offices, gift shops, restaurants, and other uses otherwise not allowed in residential zones. Universities are packed with student serving businesses and university related office buildings. Even large churches can have book stores. The intent of the campus plan process is to allow for these uses as a part of a campus while ensuring adequate public review of the potential impacts.

This recommendation would retain the existing allowance for these uses within an approved Campus Master Plan. Such uses would not be allowed through the special exception provisions without an approved Campus Master Plan.