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MEMORANDUM

TO: District of Columbia Zoning Commission
FROM: Jennifer Steingasser, ^{JS} Deputy Director
DATE: March 18, 2010
SUBJECT: Zoning Commission Case No. 09-19: Request for Special Exception Approval of a New Campus Plan for the Mount Vernon Campus, Further Processing of the Campus Plan, and Related Relief.

I. SUMMARY RECOMMENDATION

The George Washington University (the "University") has applied pursuant to § 210 for special exception approval of a new campus plan for the Mount Vernon Campus and for further processing to allow the construction of an addition to Ames Hall. The University also seeks special exception relief from the roof structure setback requirement of § 400.7, pursuant to § 411.1, in connection with the further processing request. The Office of Planning (OP) recommends approval of the proposed campus plan, further processing, and related relief requests, subject to: 1) the adoption of the University's proffered conditions found its November 23, 2009 submission (hereinafter, the "Application"); 2) the adoption of additional conditions proposed by the University in the March 11, 2010 submission (hereinafter, the "Pre-Hearing Supplement"); and 3) the adoption of conditions proposed by OP in this report.

II. APPLICATION IN BRIEF

Location: Twenty-three acres immediately west of Foxhall Road N.W., between W and Whitehaven Streets N.W. (Square 1374, Lot 850), at address 2100 Foxhall Road N.W.
Applicant: The George Washington University¹
Current Zoning: Split-zoned: D/R-1-A and D/R-1-B²
Property Size: Approximately 23 acres
Proposal: The University proposes a new ten-year campus plan, to be valid through December 31, 2020, and further processing proposal to construct an addition to Ames Hall
Relief and Zoning: Pursuant to 11 DCMR Chapter 24, the University requests the following relief:
1. Special exception relief for a campus plan and further processing pursuant to § 210
2. Special exception relief from the roof structure setback requirements of § 400.7, pursuant to § 411.11

¹ Note that the Foggy Bottom campus is subject to a separate campus plan. Additionally, the University was chartered as an educational institution of higher learning as required under § 210.1.

² "D" references the Mixed Use Diplomatic Overlay District.

Although not requested, OP believes that the University's revised Ames Hall plans may also require special exception relief from the limitation on the number of roof structures of § 411.3, pursuant to § 411.11

III. SITE DESCRIPTION

The subject property is Lot 850 in Square 1374 (hereinafter, the "Property" or "Campus").³ It measures approximately 23 acres and has an irregular shape. The Campus features undulating topography, with areas of highest elevation at roughly the northeast quadrant of the site. The Campus extends from W Street to the north to Whitehaven Parkway to the south, and from Foxhall Road to the east to a residential area on the west.

The Campus is improved with several academic, residential, and athletic facilities. Existing buildings are concentrated around a quadrangle on the eastern side of the Property. Athletic facilities, including a soccer field, tennis courts (above a parking garage), swimming pool, and softball field, are located in the center and southeastern areas of the Campus. A reconstructed residence hall (Pelham) and the Hand Chapel are located to the southwest and northwest areas of the Property, respectively. Campus buildings currently have a floor area ratio (FAR) of approximately 0.36 and a lot occupancy of approximately 20.2%. The western edge of the campus is largely wooded. The primary vehicular entrance to the Campus is located on Whitehaven Parkway, while a restricted vehicular entrance is located on W Street.



OP Exhibit 1: Aerial view of site, which is outlined in white dashes (photograph does not reflect the Pelham Replacement Project)

³ Lot 806 in Square 1385 (along Berkeley Terrace) is not included in the campus plan.

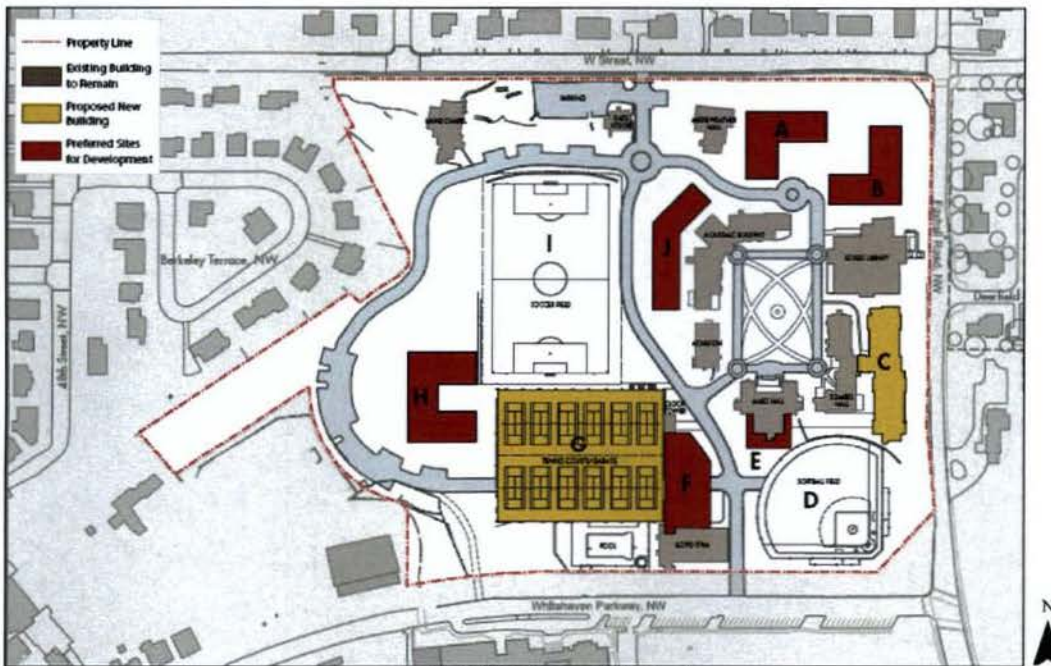
IV. AREA DESCRIPTION

To the north of the Campus, across W Street, are single family detached residential dwellings. Similar dwelling types also line Berkeley Terrace N.W. and W Street west of the Campus. To the east, across Foxhall Road, is a residential area called Phillips Park that is under development. To the south of the Campus, along Whitehaven Parkway, is St. Patrick's Episcopal Day School.

The surrounding neighborhood is zoned for, and mostly occupied by, low density residential uses. However, in addition to St. Patrick's, there are several other institutional uses in the area. The Field School, Kreeger Museum, and the German Embassy are located along Foxhall Road, and the Lab School abuts Reservoir Road and Whitehaven Parkway, among other institutional uses. Retail uses are located along MacArthur Boulevard further west of the Campus.

V. PREVIOUS CAMPUS PLAN

Approved on December 15, 1999, the existing campus plan (hereinafter, the "2000 Plan") is scheduled to expire at the end of 2010.⁴ Under the 2000 Plan, the University was approved for 320,000 square feet of new construction on the Campus, an amount that also included the replacement of demolished space. Of that amount, the 2000 Plan allocated 290,000 square feet to residential/athletic support uses and 30,000 square feet to academic/administrative uses. To fully realize such growth, five buildings were slated to be razed: Pelham, Webb, Clark Hall, Hensley Hall, and Cole Hall. Total Campus build-out, and associated demolitions, were projected to produce a total Campus density of 478,928 square feet, or 0.49 FAR. The map below shows the development plan approved in the 2000 Plan:



OP Exhibit 2: The 2000 Plan⁵

The 2000 Plan had several other notable features. It permitted the construction of an improved campus entrance along Whitehaven Parkway designed to serve as the Campus' primary vehicular entrance. The number of students enrolled on the campus was capped on any given day at no more than 1,000 FTE⁶ and a

⁴ The existing campus plan is valid through December 31, 2010. See BZA Application No. 16505, p. 2.

⁵ Reproduced Application Exhibit F.

⁶ Full time equivalent.

1,500 student headcount.⁷ Building setback lines from Campus borders were designated to remove future development from close proximity to neighbors. The University also agreed to several conditions such as limiting vehicular access and circulation, enhancing the landscaping, controlling traffic and off-site parking, and managing noise and lighting on the Campus.

The University, as a component of the adoption of the 2000 Plan, also concurrently received further processing approval for several developments which were subsequently built. An addition to Somers Hall (labeled "C" in OP Exhibit 2 above) would provide expanded dormitory space, and a softball field (labeled "D" in OP Exhibit 2), underground storage, athletic support space, and parking spaces for 175 vehicles beneath tennis courts (labeled "G" in OP Exhibit 2) boosted athletic facilities and parking on Campus.

In 2007, the University received further processing approval and an amendment to the 2000 Plan to accommodate the construction of a replacement for the Pelham Hall dormitory in order to accommodate approximately 287 beds (labeled "H" in OP Exhibit 2).⁸ Construction of Pelham Hall is now being completed.

Following the adoption of the 2000 Plan, the University has constructed 169,501 square feet. The Campus now totals 347,558 square feet or 0.36 FAR. Several of the buildings identified in the 2000 Plan were not constructed (labeled A, B, E, F, and J in OP Exhibit 2) and only Pelham Hall was razed. Additionally, according to University figures, during the fall of 2009, the daily student FTE count was 623 and student headcount was 1,148.⁹

VI. NEW CAMPUS PLAN PROPOSAL

Introduction

The proposed campus plan (hereinafter, the "2010 Plan") would replace the existing plan in its entirety. It is intended that all aspects of the existing plan that are still relevant, including agreements made to neighbors, would be brought forward into the 2010 Plan. During the preparation of the 2010 Plan, the University conducted extensive consultation with neighbors, community groups, and district agencies. Feedback received during this collaborative process shaped many of the features now present in the proposal.

The new plan incorporates several elements, each of which are summarized here and discussed in detail later in the report:

- The development plan proposes limited additional density and student enrollment beyond what was approved under the 2000 Plan. The plan reflects an effort to balance the University's need for additional facilities, particularly the expansion of academic space on the Campus, with the height, massing, and intensity concerns of neighbors. A recurring theme during the preparation of the plan was the University's determination to concentrate any new residential development toward the center of the Campus and away from W Street.
- Striving to offset any impacts on neighbors from the new development, the University has made many commitments related to improving the landscaping, lighting, noise, streetscape, vehicular access, and stormwater management on the Campus. The conditions are listed in Application Exhibits U and are modified and added to in the University's Pre-Hearing Supplement.

⁷ The University was permitted to return to the BZA for an increase in student population after five years but declined to do so.

⁸ The application was granted pursuant to ZC Order No. 07-12 (Sept. 17, 2007).

⁹ GW presentation of "Draft 2010 Mount Vernon Campus Plan," Community Meeting #7, 10/22/09.

- The proposal seeks to increase the cap on the number of students on Campus by 10% for FTEs and 15% for headcount. The traffic impact of the increased number of students is addressed in the University's traffic study.
- The University has provided an implementation schedule for several of its commitments, as seen in Application Exhibit V.

Campus Plan Components

A discussion of 2010 Plan features, and references to applicable § 210 special exception criteria, are provided below:

(a) **Development** (§§ 210.2, 210.3, 210.4, & 210.8)

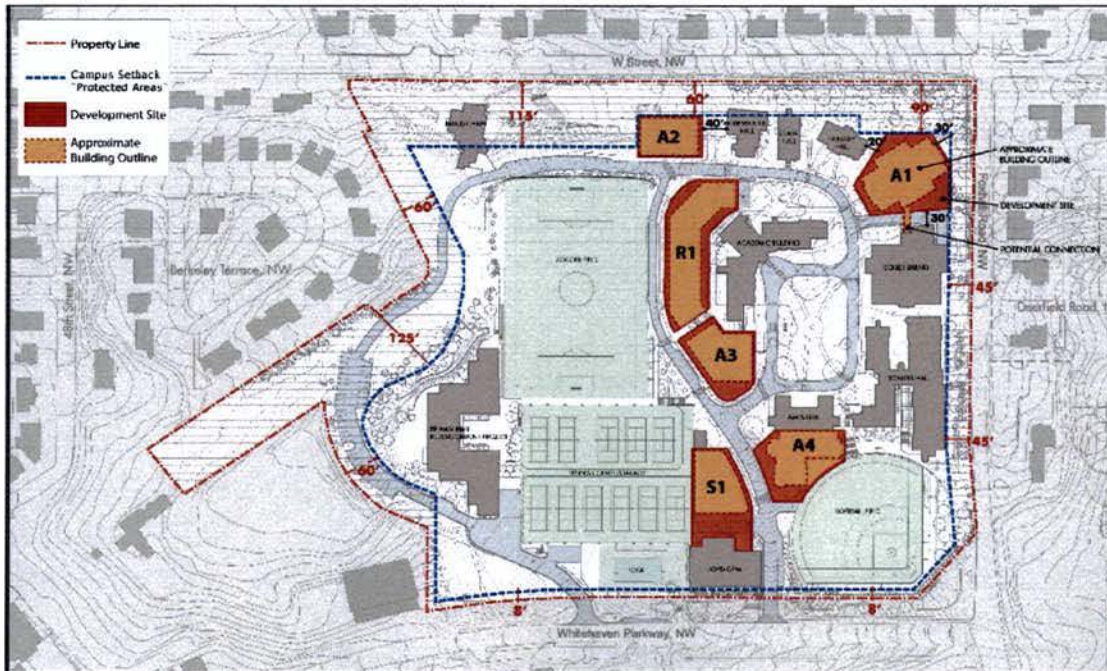
- **Total Build-Out:** The application proposes six development sites. The University intends to construct 170,886 new square feet with an associated demolition of 20,387 square feet. The related razing of Cole Hall, Acheson, Webb, and the Gatehouse would accommodate the new development. In combination with retained buildings, a full build-out of the Campus pursuant to the 2010 Plan would total 498,057 square feet, or 0.51 FAR. This amount would exceed the approved total under the 2000 Plan by 19,123 square feet. The buildings would occupy approximately 25% of the site, up from the existing 20% lot coverage.¹⁰
- **Uses:** The University aims to increase the proportion of academic/administrative space on campus. New construction would provide 105,886 square feet of academic/administrative space across four new locations.¹¹ In addition, 50,000 new square feet would be reserved for residential/campus life uses and 15,000 square feet for athletic/campus life uses. New residential uses would deliberately be located toward the center of the campus and away from residential neighbors along W Street. With the construction of site R1 (see OP Exhibit 3 below) and the razing of Cole Hall, there would be a net increase of 100 beds on campus for a total of no more than 800 beds.¹²
- **Height:** Proposed buildings would range between 3 and 4 stories, with heights between 39' and 63'.¹³ In response to neighbor concerns, academic building A2 has been lowered in height from earlier designs and A2 would only be constructed after a certificate of occupancy has been issued for the A1 building. Anticipated building outlines are provided in Application Exhibit H, reproduced below.

¹⁰ See Pre-hearing Supplement Exhibit A (labeled Exhibit J). The University also has not sought approval for any new use of a previously approved building site to be moved off-campus.

¹¹ This square footage amount is in addition to the repurposing of Ames Hall to academic/administrative use.

¹² See Pre-hearing Supplement Exhibits A (labeled Exhibit J), which also identifies athletic and other recreational facilities, and E. All activities on Campus are identified in Application Exhibits G and I. The University has also not proposed any interim uses.

¹³ The University measured height from the "finished grade at the middle of the front of the building to the top of the roof, inclusive of architectural embellishments or mechanical equipment." See Footnote 1 in Pre-Hearing Supplement Exhibit A (labeled Exhibit J).



OP Exhibit 3: Development Plan: Reproduced Application Exhibit H

- **Analysis:** The proposed development and uses should not become objectionable to neighboring properties. The 2010 Plan proposes only a modest increase in density compared to the previous campus plan. The maximum proposed development, combined with retained existing development, would total an FAR of 0.51, less than a third of what is permitted under the Zoning Regulations.¹⁴ Certain building heights have been lowered to minimize any impacts on neighbors, and new residential use has been located toward the center of Campus.

(b) Number of students and faculty/staff and related traffic impacts (§ 210.2)

- **2000 Plan:** As reference, under the 2000 Plan, students on the Campus were counted on a daily basis, meaning the number of students on Campus on any given day would not exceed the designated limit. As provided in the 2000 Plan BZA Order¹⁵, student numbers were counted and capped as follows:
 - The traditional student population shall not exceed 1000 full time equivalent (FTE) students, which shall not exceed a 1500 head count.
 - GW/MVC resident students shall each be counted as one full-time student for purposes of calculating FTE's, regardless of how many credit hours are taken by such students.
 - The non-traditional, evening and weekend continuing education student population, including conference attendees, shall not exceed 300 on any given day during the spring and fall semester. During the summer months, the number of participants in campus activities or programs, including students, shall not exceed 1000 FTE, which shall not exceed 1500 head count on any given day.
 - The proportion of non-resident students enrolled in regular day-schedule courses on the GW/MVC campus will not exceed approximately 50 percent at any time during the life of the Campus Plan provided the University obtains the regulatory approvals for the future residence hall construction proposed in this Campus Plan.

¹⁴ The Campus is located within the R-1-A and R-1-B zoning districts. The R-5-B District prescribes a 1.8 FAR limitation.

¹⁵ BZA Application No. 16505, p. 2.

- The FTE and head count apply at all times. The FTE computation for the Mount Vernon Campus shall be determined yearly and shall be provided to the community in January of each year, starting January 2001. In addition, if requested, the University shall make available to the community its annual IPEDS to the US Government that reports student population to the University.
- **2010 Plan:** The University proposes an increase in the base student enrollment cap. Under the 2010 Plan, the FTE student cap would rise 10% (100 students) and the student headcount cap would increase by 15% (225 students). The University also requests certain changes to existing population limitations. The evening, weekend, and non-traditional student cap, the summer participant cap, and the proportion of non-resident to resident student limitations would be eliminated. The number of Mount Vernon resident students would be capped at 800. A new special events limitation would be added. As such, the proposed 2010 Plan would have the following features:
 - “The number of students enrolled in a credit bearing course on any given day (counted during the week of the semester census) will not exceed 1,725 on a headcount basis and 1,100 on a full-time equivalent basis. Furthermore, not more than 800 of these students may be ‘Mount Vernon Residents.’”
 - “The ‘Mount Vernon student headcount’ shall be defined as students who have a housing assignment at the Mount Vernon Campus or are enrolled in a credit-bearing course on the Mount Vernon Campus.”
 - “The ‘Mount Vernon full-time equivalent’ shall be defined as follows:
 - Students who have a housing assignment at the Mount Vernon Campus or take all of their classes at Mount Vernon shall each be counted as one full-time equivalent.
 - Full-time equivalency will be determined by counting all full time students as 1 and then adding up to the total number of course credits enrolled on the campus by part time students and dividing by a full-time course load (generally 12 credits), with the exception that all “Mount Vernon Residents” will equal 1 student (on every day of the week) for both headcount and FTE counting purposes. Currently, the full-time course load for undergraduate students is 12 credits and the full-time course load for graduate students is 9 credits. Formulas for determining full-time equivalents may change over the term of the 2010 Mount Vernon Campus Plan depending on program requirements or the restructuring of the academic calendar.”
 - The University estimates that the number of faculty/staff would not exceed 150 at any one time over the life of the 2010 Plan, but is not proposing a cap.¹⁶
- **Traffic:** The University’s traffic study finds that the additional student enrollment and faculty and staff levels are expected only to generate 57 additional AM peak hour vehicle-trips and 36 additional PM peak hour vehicle trips. The traffic study concludes that this “level of traffic is expected to have no discernable impact on traffic operations at the study intersections.” The Vern Express, which had a ridership of 650,137 passengers during the 2008-09 academic years, would carry a substantial bulk of visitors to the Campus. The traffic study also indicates that the amount of vehicle parking on Campus is sufficient and proposes a Parking Management Plan to ensure adequate supply.

¹⁶ The application does not provide a method for how faculty/staff would be counted, although the University indicated to OP that the number reflected office/staff whose primary office is located on the Mount Vernon Campus.

- **Analysis and Proposed OP Conditions:** The University proposes a measured increase in the number of students on Campus, and the traffic study indicates that the Campus, and surrounding roads, can suitably accommodate the enrollment growth. DDOT will provide additional comments regarding traffic impacts under separate cover. However, OP continues to have several concerns. The University has not yet demonstrated that non- University participants in summer activities, combined with students, may not adversely impact neighboring properties. Such a limitation was provided in the 2000 Plan. OP also recommends certain changes to strengthen the proposed limitations on special events to better address larger events held on the Campus. Further, OP recommends that the University specifically adopt the conclusions and recommendations of the Transportation Impact study, including the Transportation and Parking Management Plans. In order to provide additional traffic and impact predictability for neighbors, the following conditions should be adopted:
 - **During the summer months, the number of non-University visitors (“Visitors”) participating in campus activities or programs, when added with University students, shall not exceed 1,725 head count on any given day.**
 - **The University shall avoid scheduling performances, athletic events, and other special events (“Events”) likely to attract large numbers of non-University visitors (“Visitors”) to the campus on weekdays during the peak commuter traffic times of 7 a.m. to 9 a.m. and 5 p.m. to 7 p.m.**
 - a) **Weekday evening performance events expected to draw more than 100 Visitors shall begin no earlier than 7:00 p.m.**
 - b) **The University shall avoid scheduling weekday athletic events that are expected to draw over 100 Visitors to begin during the peak commuter traffic times.**
 - c) **The University shall publicize the availability of its shuttle service between the Mount Vernon Campus and the Foggy Bottom Metrorail Station to Visitors attending these Events.**
 - d) **The University shall employ campus personnel as necessary to facilitate smooth flow of traffic into and out of the campus during these Events.**
 - e) **The University shall work with area institutions in order to provide additional parking for unusual situations where modal choices of event attendees are likely to result in excessive parking demand.**
 - f) **The University shall use good faith efforts to provide advance written, fax, or e-mail notice of these Events to its neighbors and ANC. Extracurricular events such as performances or athletic events shall not require such notice so long as such activities involve and are for the benefit of student teams or other groups of the University.**
 - g) **This condition shall not apply to the use of the pool or tennis courts.**
 - **The conclusions and recommendations of the Transportation Impact Study, including the Transportation and Parking Management Plans, shall be specifically adopted by the University as part of the 2010 Plan.**

(c) Circulation and Parking (§§ 210.2 & 210.4)

- **Vehicular circulation:** The University proposes certain changes concerning how vehicles access the Campus. Conditions imposed under the 2000 Plan already limited vehicular access to the Campus from W Street. Responding to community input, the University now proposes to close the existing W Street entrance entirely and to relocate a pedestrian and emergency vehicle-only route east of the existing curb cut on W Street. Additionally, the existing parking lot and Gatehouse near the W Street entrance would be removed. Vehicles, including the Vern Express shuttle bus, would continue

to access the Campus from the primary entrance along Whitehaven Parkway. Other restrictions limit the use of the western perimeter road, and the secondary Whitehaven Parkway access road would be limited to service and delivery vehicles.¹⁷

- **Parking:** All students, staff, faculty, and visitors to the campus who drive would be required to park on Campus. The Campus currently has 196 parking spaces, including 148 spaces in the parking garage. After the anticipated removal of the surface parking lot along W Street, the delivery of 46 parking spaces expected with the completion of the Pelham Hall redevelopment project, and the creation of additional surface parking spaces along the perimeter road, the Campus would have a total of 201 parking spaces. The Vern Express shuttle bus service would continue to provide service to students, faculty, staff, and visitors between the Mount Vernon and Foggy Bottom campuses.¹⁸
- **Pedestrians:** The application proposes improved access from W Street in coordination with a reconstructed entrance. A new sidewalk along Whitehaven Parkway from Foxhall Road would be installed. New sidewalks would also be constructed in the campus interior to improve pedestrian flow and safety.

(d) Building Design, Edge Conditions, and Stormwater Management (§§ 210.2 & 210.4)

- **Green Building:** All new buildings constructed on the Campus would meet or exceed the equivalent of certification under the US Green Building Council's (USGBC) Leadership in Energy and Environmental Design for New Construction ("LEED NC").
- **Building Design Guidelines and Proposed OP Condition:** Proposed building design guidelines, aimed at ensuring the compatibility of new construction, are also provided in Application Exhibit O. In response to concerns raised by the Historic Preservation Office (HPO), OP has worked with the University to supplement the design guidelines as they relate to roof structures to ensure compatibility with the historic characteristics of the Campus. OP recommends the following language:
 - **The design of mechanical penthouses will be integrated into the building's design with a hip and gable roof in an architectural style consistent with existing Mount Vernon Campus buildings. Where development site constraints do not permit such integration, GW will meet with the Office of Planning and Historic Preservation Office to discuss penthouse design solutions.**
- **Campus Perimeter:** The University proposes several improvements to the Campus perimeter. Among other features, the proposal would maintain existing building setbacks from the campus borders as designated protected areas. Landscape improvements would aim for a "more attractive perimeter to include flowering trees, shrubs, brick gateways, sidewalks, and signage." New campus fencing would be located in a less intrusive manner behind landscaped buffers. An improved entry from Whitehaven Parkway would include a "brick gateway, improved landscaping, new sidewalk, and a handicapped accessible pathway." A 10' high wall would be constructed on the north end of the soccer field to minimize noise impacts from athletic events. The University would also mitigate noise generated by mechanical equipment located behind Eckles Library near Foxhall Road, an issue raised by neighbors. Additionally, automatic timers would be installed on the tennis court lights to minimize late night light pollution.¹⁹

¹⁷ See Application Exhibits R and S.

¹⁸ See Application Exhibit S.

¹⁹ The University has provided information about screening, signs, and streets in Application Exhibits K, L, M and N.

- **Stormwater:** The 2010 Plan commits to controlling stormwater on site. Specific stormwater system technologies would be implemented on a building by building basis. In the case of Ames Hall, which is the subject of the further processing request, the University has informed OP that it intends to install a sand filter and partial green roof to help manage stormwater run-off related to the building. In general, the stormwater management system associated with each development site would be designed to have a 0% net impact on the stormwater drainage system and will be approved by the District Department of the Environment (DDOE).²⁰

(e) Noise and Lighting (§ 210.2)

- **Noise:** Among other features, new residential use on Campus would be located toward the center of Campus and away from neighbors. There would be no amplified sound after 7 p.m. on the tennis courts or soccer field (except for soccer overtimes or special events). A wall at the north end of the soccer field a 10' would be constructed to mute sounds from the athletic fields, and noisy mechanical equipment located behind Eckles Hall would be addressed.
- **Lighting:** New lighting guidelines would aim to sensitively design and locate future light fixtures. Lighting would not be added to the soccer field and existing tennis court lights would be programmed to automatically shut-off at 11 p.m.

(f) Historic Preservation/Archaeology

- **2010 Proposal:** The University has provided information regarding the Campus' history in Pre-Hearing Supplement Exhibit B. Further, the University has committed to "develop, in consultation with HPO, an agreement to set forth appropriate treatment of the Campus and mechanisms for consultation with HPO on various projects on the Campus for the duration of the 2010 Plan."
- **Analysis and Proposed OP Conditions:** HPO recognizes that portions of the Campus and its buildings are of historical interest and are considered eligible for listing in the District of Columbia Inventory of Historic Sites. HPO will work with University to develop a treatment plan for the Campus that takes into account the potential effects of construction activities on the Campus pursuant to the 2010 Plan. To that end, OP recommends the following conditions:
 - **Before any application for further processing under the approved 2010 Campus Plan (not including Ames Hall), the following documents shall be submitted to HPO:**
 - 1) **An inventory for submission to the HPO of all buildings on Campus including their dates of construction, architect, description of construction and materials, and identifying alterations and additions.**
 - 2) **In consultation with HPO, an analysis of the Campus to determine areas of higher and lower interest for historic and archaeological properties. A treatment plan specific to the needs of each area will be developed, allowing more flexibility for areas of lower interest and exempting certain activities from review.**
 - 3) **In consultation with HPO, a treatment plan for areas of the Campus that are of higher historical interest, which outlines a process for consultation with the HPO, establishes standards for treatment of buildings in these areas, and includes provisions for dispute resolution.**

²⁰ The University indicates that the Campus is served by all major utilities and that no special utility development conditions are expected to be required in connection with the 2010 Plan.

(g) Conditions and Implementation Schedule (§ 210.2)

- **Conditions:** The University has proposed a range of commitments, some of which have been carried forward from the 2000 Plan, others which are newly introduced in the 2010 Plan. The conditions, which are provided in detail in Application Exhibit U, are organized under the following categories: (1) Ames Hall renovation project; (2) campus development; (3) student enrollment; (4) access and circulation; (5) traffic and parking; (6) landscaping; (7) noise; (8) lighting; (9) sustainability and stormwater management; and (10) quarterly meetings. Several additional conditions were included, and some earlier conditions were modified, in the Pre-Hearing Supplement. Given the volume of conditions proposed and the need to accurately document them, OP recommends the following condition:
 - **The University shall submit a consolidated and complete list of the conditions associated with the 2010 Plan prior to any final order.**
- **Implementation Schedule:** The University has also provided an implementation schedule for many of the commitments made in the 2010 Plan, as detailed in Application Exhibit V. Of note, the schedule addresses the University's willingness to close W Street, a proposal which was well received by neighbors. However, the schedule links the expected closure of the W Street entrance and the removal of the W Street parking lot to the issuance of a certificate of occupancy for the Ames Hall expansion. Based on how the implementation plan is now written, should the University not construct the Ames Hall addition, the closure of the entrance and the removal of the parking lot would no longer be required. As such, based on consultation with the University, OP recommends that the following modification be included:
 - **In the event that another Development Site identified under the 2010 Plan is completed prior to Ames Hall Renovation Project, the University will file for the necessary permits to implement the proposed W Street entrance modifications and related improvements (shown on Exhibit L of the 2010 Plan) prior to the issuance of a certificate of occupancy for that project instead.**

VII. FURTHER PROCESSING: AMES HALL

In conjunction with the 2010 Plan, the University proposes to renovate and construct an addition to Ames Hall. The building is identified as "A4" in the Application Exhibit H and is located near the center of the Campus. In response to the sloping topography of the site, the addition would taper down toward its southern end. The building would contain a mix of "academic classrooms, informal student gathering space, faculty office, and other academic and administrative support space," which is a change from its current use for campus life space. The expanded Ames Hall would increase by approximately 28,866 net new square feet to a total of 47,316 square feet.

Among other features, the addition would include: 1) space for the University Police Department (UPD), as well as storage space and enclosed service area for trash and deliveries, which would be located on the lowest level of the building facing the University's Whitehaven Parkway entrance; and 2) LEED certification; and 3) a design for 0% net impact on the stormwater drainage system, partly as a result of an associated sand filter and a partial green roof. The building would be of an appropriate scale and design.

The University also seeks special exception relief from the roof structure setback requirements of § 400.7, pursuant to § 411.11. According to § 400.7(b), housing for mechanical equipment "shall be set back from all exterior walls a distance at least equal to its height above the roof upon which it is located." Plans for Ames Hall indicate that the setbacks would be a minimum of 8', which would not fully compensate for the expected roof structure height which could rise no more than 18.5' high.

Special Exception

The general standards by which the BZA should review special exceptions are set forth in § 3104 and are listed below:

- (a) *Will the special exception be in harmony with the general purpose and intent of the Zoning Regulations and map?*

In evaluating whether the special exception would be in harmony with Zoning Regulations and map, § 411.11 provides guidance. The provision provides:

Where impracticable because of operating difficulties, size of building lot, or other conditions relating to the building or surrounding area that would tend to make full compliance unduly restrictive, prohibitively costly, or unreasonable, the Board of Zoning Adjustment shall be empowered to approve, as a special exception under § 3104, the location, design, number, and all other aspects of such structure regulated under §§ 411.3 through 411.6, even if such structures do not meet the normal setback requirements of §§ 400.7 ... provided, that the intent and purpose of this chapter and this title shall not be materially impaired by the structure, and the light and air of adjacent buildings shall not be affected adversely.

The Ames Hall addition would be constructed on a site that has a sloping topography and designed with sensitivity to the scale and style of adjacent Campus buildings. As a result, the proposed roof would be long and narrow, which constrains the placement of the rooftop equipment and the University's ability to comply with the required minimum setback. The proposed design should not be inconsistent with the Zoning Regulations or Zoning Map.

- (b) *Will the special exception tend to adversely affect the use of neighboring property in accordance with the Zoning Regulations and map?*

Setback relief should not adversely affect the use of neighboring property. The building's location near the center of the Campus, which is far removed from nearby residential properties, should minimize the possibility of any impact on neighbors.

Additional Relief

Although not requested, OP believes that the University's revised plans for Ames Hall may also require special exception relief from the limitation on the number of roof structures of § 411.3, pursuant to § 411.11. Section 411.3 provides that "All penthouses and mechanical equipment shall be placed in one (1) enclosure and shall harmonize with the main structure in architectural character, material, and color." OP believes that the University could demonstrate that special exception relief would be in harmony with the Zoning Regulations and would not be adverse to the use of neighboring property.

VII. COMPREHENSIVE PLAN

The Comprehensive Plan (hereinafter "Comp Plan") Future Land Use Map designates the Campus as "Institutional." Institutional land uses include land and facilities occupied and used by colleges and universities. The 2010 Plan would not be inconsistent with the following Comp Plan guidance:

Policy LU-2.3.5: Institutional Uses

"Recognize the importance of institutional uses, such as private schools, child care facilities, and similar uses, to the economy, character, history, and future of the District of Columbia. Ensure that when such uses are permitted in residential neighborhoods, they are designed and operated in a manner that is sensitive to neighborhood issues and that maintains quality of life. Encourage

institutions and neighborhoods to work proactively to address issues such as traffic and parking, hours of operation, outside use of facilities, and facility expansion.”

Policy LU-3.2.3: Non-Profits, Private Schools, and Service Organizations

“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.”

Policy EDU-3.3.2: Balancing University Growth and Neighborhood Needs

“Encourage the growth and development of local colleges and universities in a manner that recognizes the role these institutions play in contributing to the District’s character, culture, economy and is also consistent with and supports community improvement and neighborhood conservation objectives. Discourage university actions that would adversely affect the character or quality of life in surrounding residential areas.”

Policy EDU-3.3.4: Student Housing

“Encourage the provision of on-campus student housing in order to reduce college and university impacts on the housing stock in adjacent neighborhoods. Consider measures to address the demand for student housing generated by non-District institutions with local branches.”

Policy EDU-3.3.5: Transportation Impacts of Colleges and Universities

“Support ongoing efforts by colleges and universities to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, shuttle service, bicycling, and other transportation demand management measures. The provision of adequate on-site parking for institutional uses also should be encouraged.”

Policy RCW-1.1.8: Managing Institutional Land Uses

“Manage institutional land uses in the Rock Creek West Planning Area in a way that ensures that their operations are harmonious with surrounding uses, that expansion is carefully controlled, and that potential adverse effects on neighboring properties are minimized. Ensure that any redevelopment of institutional land is compatible with the physical character of the community and is consistent with all provisions of the Comprehensive Plan and the underlying zoning rules and regulations. Densities and intensities of any future development on such sites should reflect surrounding land uses as well as infrastructure constraints and input from the local community.”

VIII. OTHER AGENCIES

OP received written responses from the DC Water and Sewer Authority (WASA) and D.C. Fire and EMS (see attached) that generally express no objection to the campus plan subject to the future satisfaction of applicable regulatory standards. The DC Metropolitan Police Department informally provided comments which expressed no concerns with the proposed plan, conditioned on the University’s commitment to hiring and placing as many additional Public Safety employees on the Campus as needed. OP also understands that DDOT will provide comments under separate cover.

IX. COMMUNITY/ANC

On March 3, 2010, ANC 3D voted in support, with conditions, of the campus plan and further processing request. The conditions included a restriction on the number of students proposed, reduction in the heights of certain proposed buildings, a limitation on the size of Vern Express buses, an acceleration of the schedule for automatic timers on the tennis court lights, and the honoring of any agreements with neighbors. OP is not aware of a letter from ANC 3D being submitted to the record reflecting the vote. OP is also not aware of any submissions by neighbors.

X. CONCLUSION

The Office of Planning recommends **approval** of the requested campus plan, further processing, and related relief, subject to the adoption of all of the University's proffered conditions as well as the following conditions (to be inserted where appropriate):

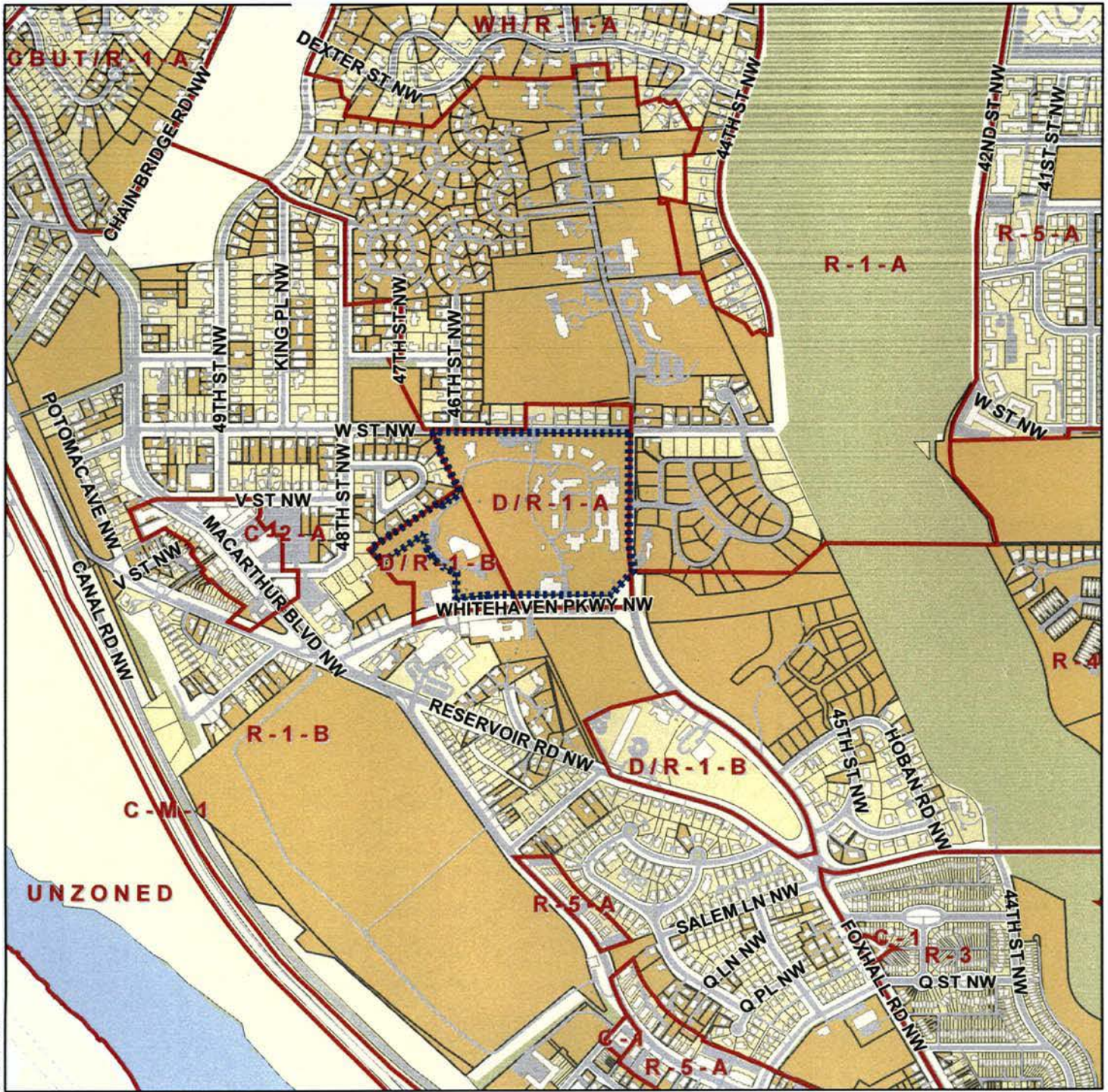
- 1. During the summer months, the number of non-University visitors ("Visitors") participating in campus activities or programs, when added with University students, shall not exceed 1,725 head count on any given day.**
- 2. The University shall avoid scheduling performances, athletic events, and other special events ("Events") likely to attract large numbers of non-University visitors ("Visitors") to the campus on weekdays during the peak commuter traffic times of 7 a.m. to 9 a.m. and 5 p.m. to 7 p.m.**
 - a) Weekday evening performance events expected to draw more than 100 Visitors shall begin no earlier than 7:00 p.m.**
 - b) The University shall avoid scheduling weekday athletic events that are expected to draw over 100 Visitors to begin during the peak commuter traffic times.**
 - c) The University shall publicize the availability of its shuttle service between the Mount Vernon Campus and the Foggy Bottom Metrorail Station to Visitors attending these Events.**
 - d) The University shall employ campus personnel as necessary to facilitate smooth flow of traffic into and out of the campus during these Events.**
 - e) The University shall work with area institutions in order to provide additional parking for unusual situations where modal choices of event attendees are likely to result in excessive parking demand.**
 - f) The University shall use good faith efforts to provide advance written, fax, or e-mail notice of these Events to its neighbors and ANC. Extracurricular events such as performances or athletic events shall not require such notice so long as such activities involve and are for the benefit of student teams or other groups of the University.**
 - g) This condition shall not apply to the use of the pool or tennis courts.**
- 3. The conclusions and recommendations of the Transportation Impact Study, including the Transportation and Parking Management Plans, shall be specifically adopted by the University as part of the 2010 Plan.**
- 4. The design of mechanical penthouses will be integrated into the building's design with a hip and gable roof in an architectural style consistent with existing Mount Vernon Campus buildings. Where development site constraints do not permit such integration, GW will meet with the Office of Planning and Historic Preservation Office to discuss penthouse design solutions.**
- 5. Before any application for further processing under the approved 2010 Campus Plan (not including Ames Hall), the following documents shall be submitted to HPO:**
 - a) GW will prepare an inventory for submission to the HPO of all buildings on Campus including their dates of construction, architect, description of construction and materials, and identifying alterations and additions.**
 - b) In consultation with HPO, an analysis of the Campus to determine areas of higher and lower interest for historic and archaeological properties. A treatment plan**

specific to the needs of each area will be developed, allowing more flexibility for areas of lower interest and exempting certain activities from review.

- c) **In consultation with HPO, a treatment plan for areas of the campus that are of higher historical interest, which outlines a process for consultation with the HPO, establishes standards for treatment of buildings in these areas, and includes provisions for dispute resolution.**
6. **The University shall submit a consolidated and complete list of the conditions associated with the 2010 Plan prior to any final order.**
 7. **In the event that another Development Site under the 2010 Plan is completed prior to Ames, the University will file for the necessary permits to implement the proposed W Street entrance modifications and related improvements upon the issuance of a certificate of occupancy for that project instead.**

JS/pg
Paul Goldstein, Case Manager

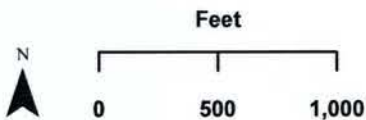
Attachments: (1) Area Map
(2) D.C. WASA submission
(3) FEMS submission



CPID0011200

Attachment 1: Aerial View of the Subject Area

-  Campus
-  Zoning Districts
-  Buildings
-  Roads
-  Alleys and Parking
-  Street Centerlines
-  Water
-  Parks



*** Government of the District of Columbia
 Adrian M. Fenty, Mayor

Office of Planning ~ February 18, 2009

This map was created for planning purposes from a variety of sources. It is neither a survey nor a legal document. Information provided by other agencies should be verified with them where appropriate.



DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY

5000 OVERLOOK AVENUE, S.W., WASHINGTON, D.C. 20032

February 23, 2010

Paul W. Goldstein
D.C. Office of Planning
2000 14th Street NW, 4th Floor
Washington, D.C. 20009

Re: Zoning Commission Case No. 09-19
The George Washington - Mount Vernon Campus Plan

Dear Mr. Goldstein,

The DC Water and Sewer Authority (DC WASA) reviewed the zoning application for this project as transmitted by the DC Office of Planning dated January 4, 2010. DC WASA comments are as follows:

Water Requirements: This site abuts a 12-inch water main in Foxhall Road, NW. This water main was built in 1934. The applicant will be required to submit the fire flow test results in the 12-inch water main in Foxhall Road while running a fire flow from the fire hydrant (H06000) at the intersection of Foxhall Road and Whitehaven Parkway and taking the static and residual pressure measurements from the fire hydrant (H09052) in Foxhall Road. If the fire flow test results indicate that the water mains in the street are hydraulically inadequate to serve this site, DC WASA will advise the applicant regarding the improvements needed in the water system to relieve the deficiency.

Sanitary Waste Requirements: This site is part of a separate storm and sanitary sewer area. There are adequate capacities in both the existing 10-inch sanitary line in W St., NW (installed 1957) and the existing 10-inch sanitary line in Whitehaven Parkway, NW (installed 1946) for wastewater generated by the proposed project.

Stormwater Requirements: This site is part of a separate storm and sanitary sewer area. There is adequate capacity in the existing 18/21-inch storm sewers in W St., NW (installed 1955) for stormwater generated by the proposed project. The developer must install storm management facilities before connection is made to the public sewer.

Groundwater During Construction: Any groundwater, surface runoff, or dewatering discharge to the combined sewer system will require a Temporary Discharge Authorization (TDA) Permit from DC WASA (for discharges to the separate storm sewer

system, follow DDOE WQD requirements). In addition to a completed and signed application form (available online at http://www.dcwasa.com/business/permits/groundwater_temporary_discharge.cfm), the application submittal shall include an analysis of the ground water, a copy of any applicable engineering plans or documents (e.g., geotechnical report or dewatering plan) and a site map showing the proposed discharge location. This application shall be mailed or delivered to Elaine Wilson, Pretreatment Coordinator at:

DC Water and Sewer Authority
Department of Wastewater Treatment, CMF 2nd Floor
5000 Overlook Ave., SW
Washington DC 20032
Telephone: 202-787-4177

Assessment: If additional trees are later incorporated in the design, clearance must be provided (minimum 5-foot distance) or utilities must be relocated as may be determined necessary by DC WASA for the protection of water and sewer utilities. A minimum 5-foot distance between existing and proposed utilities should be maintained. DC WASA will review the project plans that the applicant submits for a public space permit. DC WASA will issue a water and sewer availability certificate and recommend the issuance of a building permit if the final project plans meet DC WASA requirements.

Sincerely,



Jessica Demoise
Engineer, Planning & Design

cc: Rizwan Elahi
Vahid Bilvardi
Brian McDermott

GOVERNMENT OF THE DISTRICT OF COLUMBIA
FIRE AND EMERGENCY MEDICAL SERVICES DEPARTMENT
WASHINGTON, D.C. 20001



MEMORANDUM

TO: Paul Goldstein
Development Review Specialist
D.C. Office of Planning

FROM: Bruce D. Faust. *BDF*
Deputy Fire Chief/D.C. Fire Marshal
D.C. Fire and EMS Department

DATE: March 11, 2010

SUBJECT: ZC Case No. 09-19: George Washington University-Mt. Vernon Campus

The D.C. Fire and EMS Department has reviewed the above request.

Based on the site plans submitted, the D.C Fire and EMS Department has no objection to this request as long as construction is in compliance with the International Fire Code (2006 Edition) and all applicable D.C. Laws.

If you have questions concerning this review, please contact Captain Chris Roggeron at 727-1614.