

## **MEMORANDUM**

**TO:** District of Columbia Zoning Commission

**FROM:** Philip Bradford, AICP, Development Review Specialist  
*JS* Jennifer Steingasser, AICP, Deputy Director, Development Design, Preservation

**DATE:** January 15, 2025

**SUBJECT:** ZC Case 12-15D – Public Hearing Report for a Campus Plan Amendment and Further Processing for Gallaudet University – Merrill Learning Center

### **I. RECOMMENDATION**

Gallaudet University submitted a request for amendment and further processing of the 2012 Gallaudet University Campus Plan (“Campus Plan”) to partially demolish and renovate with additions the Merrill Learning Center (“MLC”), pursuant to Subtitle X § 101, special exception review.

The Office of Planning (OP) recommends **approval** of the following:

1. Amendment to the Gallaudet University Campus Plan to retain the Merrill Learning Center (MLC), previously identified on the approved Campus Plan for future demolition, and
2. Further processing to authorize the construction of the new portions of the Merrill Learning Center along with the landscape and hardscape improvements immediately adjacent to MLC located within Gallaudet Mall.

### **II. BACKGROUND**

The Gallaudet University Campus Plan is a ten-year plan for the University approved in September 2012, with subsequent modifications and further processing applications, with an approved extension until 2027. In this filing, the University is requesting amendments to the Plan to retain the Merrill Learning Center, which is identified for future demolition on the approved campus plan. The applicant proposes the demolition of the above grade portion of the structure and a complete renovation of the below grade structure to contain a variety of archival, multipurpose, research, and academic spaces. The upper levels will be replaced with a glass structure which will serve as the lobby and contain a café. Other improvements include extensive new landscaping surrounding the project site to enhance the Gallaudet Mall.

### **III. APPLICATION-IN-BRIEF**

<b>Applicant:</b>	Holland and Knight LLP, on behalf of Gallaudet University
<b>Address:</b>	800 Florida Avenue NE
<b>Zone:</b>	RF-1
<b>Ward and ANC:</b>	Ward 5, ANC 5D

<b>Legal Description:</b>	Square 3593, Lot 0004
<b>Property size:</b>	93 acres
<b>Generalized Policy Map Designation:</b>	Institutional Uses - Much of the land identified as institutional on the map represents colleges and universities; change and infill can be expected on each campus consistent with campus plans. Policies in the Land Use and the Educational Facilities Elements address the compatibility of such uses with surrounding neighborhoods.
<b>Future Land Use Map Designation:</b>	Institutional – Includes land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions. While included in this category, smaller institutional uses such as churches are generally not mapped, unless they are located on sites that are several acres in size.
<b>Historic District</b>	Gallaudet College Historic District
<b>Historic Landmark</b>	Chapel Hall, Gallaudet University President’s House

#### IV. PROPOSED MODIFICATIONS

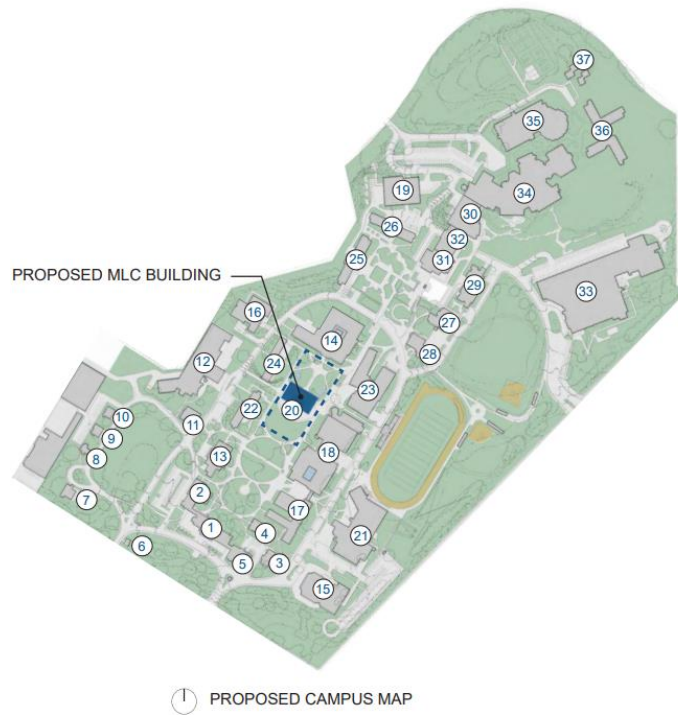
##### Modification to Approved Campus Master Plan – Merrill Learning Center

The Merrill Learning Center was constructed in the early 1980’s and served previously as the main library and learning center for Gallaudet University. The building was identified on approved campus plan as being in poor condition and the plan indicated that the building would be demolished in the future. Gallaudet has closed the MLC since 2022 after relocating library facilities elsewhere on campus.



Gallaudet University proposes to modify the Campus Plan to allow for the demolition of the above ground portions of the MLC, with renovation of the below-grade portions of the building instead of complete demolition of the building as identified in the Campus Plan Section 8.10 – Phase III Planned Projects. The above ground portion would contain a glass pavillion approximately 3,800 square feet in size and would contain a new lobby for the MLC, and a café space for students. The proposed renovation of the building would result in a reduction in square footage by 20,000 square feet for a new total of 80,000 square feet of gross floor area. The renovations of the below grade portion of the building would include the University’s deaf archives, a video studio, the Office of Research, the

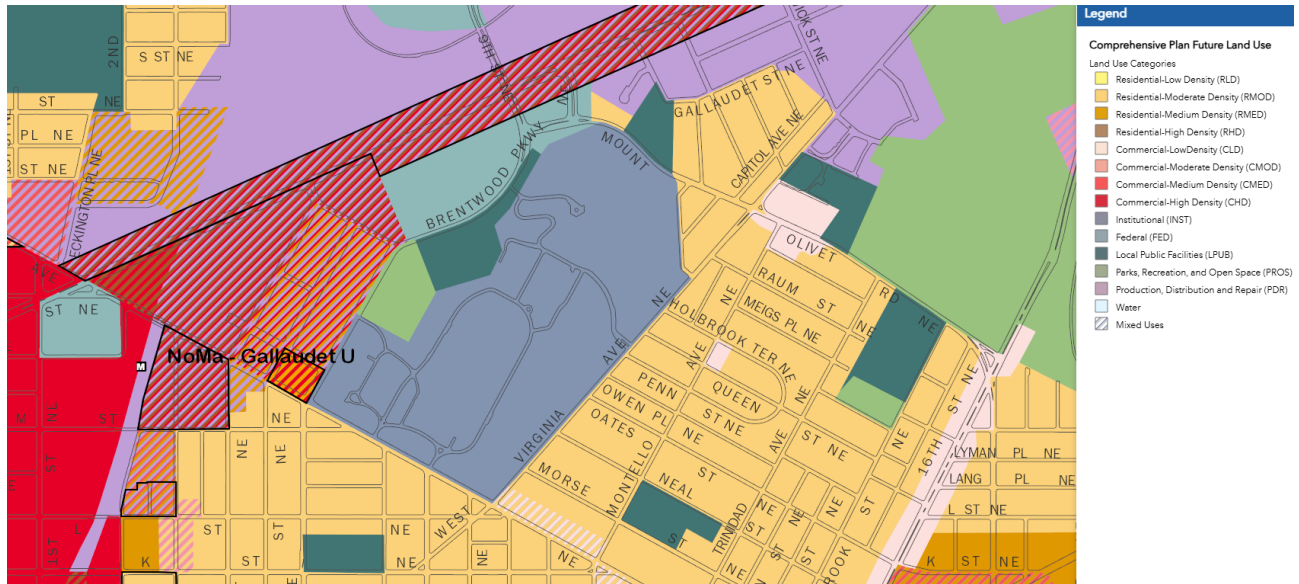
Schuman Deaf Documentary Center, class room and collaborative space, mutlipurpose room, lecture halls, and flexible work / study space all designed using DeafSpace design principles.



A series of new skylights and openings into the structure will allow for greater natural light to reach the below grade portions of the building, with a new wall of windows facing south towards Gallaudet Mall. The southern portion will face a new outdoor ampiteater and landsacpaing that will be built in a future phase of construction. The project also includes new landscaping and seating areas around other areas of the MLC that will further enhance the experience of the campus and Gallaudet Mall.

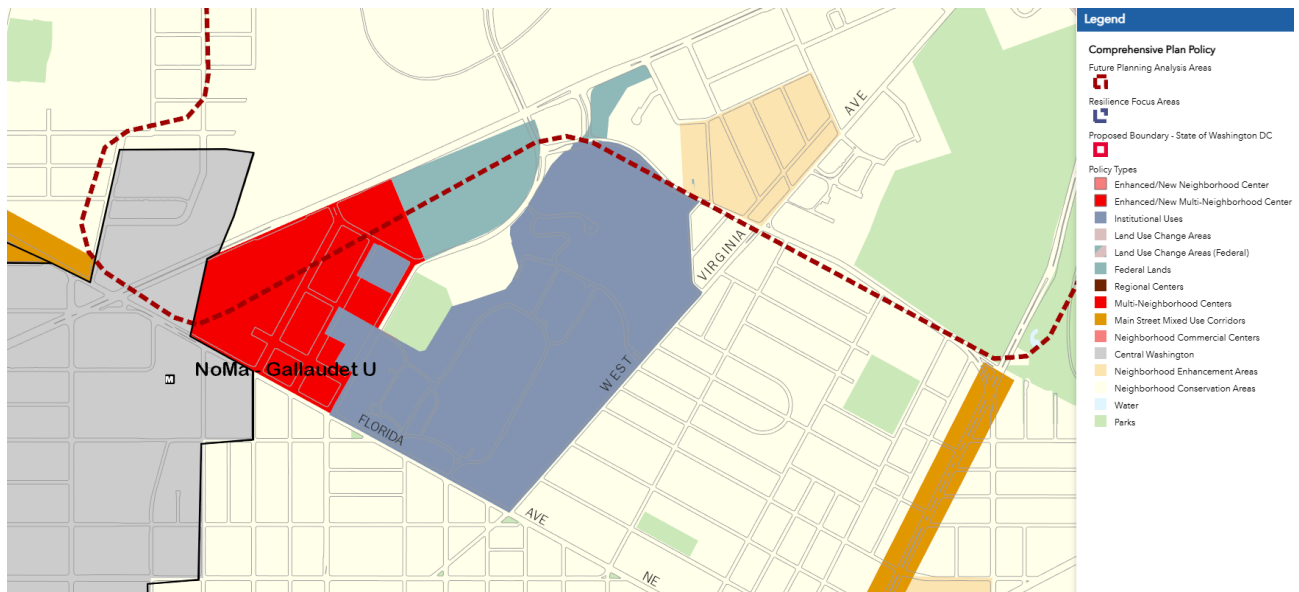


## V. COMPREHENSIVE PLAN



### Future Land Use Map

The Comprehensive Plan Future Land Use Map labels the majority of the campus as “Institutional”, described as “land and facilities occupied and used by colleges and universities, large private schools, ...” The area of the campus west of 6<sup>th</sup> Street, Union Market District, is identified as Mixed “High Density Commercial,” “Production, Distribution, & Repair,” and “Medium Density Residential”.



### Generalized Policy Map

The Comprehensive Plan Generalized Policy Map identifies the campus as “Institutional Uses” Described as colleges and universities, large private schools, ...” University and private school uses are consistent with these map designations.



## ***Comprehensive Plan Written Elements***

### ***Upper Northeast Element***

#### ***Policy UNE-1.2.7: Institutional Open Space***

*Recognize the particular importance of institutional open space to the character of Upper Northeast, particularly in and around Brookland, Woodridge, and Gallaudet University/Trinidad. Opportunities also exist for connections between the Gallaudet campus and the network of open spaces to the west, including the Metropolitan Branch Trail and the Burnham Spine, which lead to Union Station and the National Mall. In the event that large institutional uses are redeveloped in the future, pursue opportunities to dedicate substantial areas as new neighborhood parks and open spaces. Connections between Upper Northeast open spaces and the network of open space between McMillan Reservoir and Fort Totten should also be pursued. 2409.7*

The proposed improvements to the Gallaudet Mall associated with the MLC renovation project contributes to the implementation of this policy goal which emphasizes the importance of institutional open space in Upper Northeast. The improved landscaping, seating areas, and pedestrian circulation substantially contribute to an improved campus and enhance connectivity through the area.

### ***Land Use Element***

#### ***Policy LU-2.1.1: Variety of Neighborhood Types***

*Maintain a variety of neighborhoods, ranging from low-density to high density. The positive elements that create the identity and design character of each neighborhood should be preserved and enhanced while encouraging the identification of appropriate sites for new development and/or adaptive reuse to help accommodate population growth and advance affordability, racial equity, and opportunity. 310.7*

#### ***Policy LU-2.1.4: Rehabilitation Before Demolition***

*In redeveloping areas characterized by vacant, abandoned, and underused older buildings, generally encourage rehabilitation and adaptive reuse of architecturally or historically significant existing buildings rather than demolition. 310.11*

#### ***Policy LU-2.3.5: Institutional Uses***

*Recognize the importance of institutional uses, such as private schools, childcare facilities, hospitals, churches, and similar uses, to the economy, character, history, livability, and future of Washington, DC and its residents. Ensure that when such uses are permitted in residential neighborhoods, their design and operation is sensitive to neighborhood issues and neighbors' quality of life. Encourage institutions and neighborhoods to work proactively to address issues, such as transportation and parking, hours of operation, outside use of facilities, and facility expansion. 312.7*

#### ***Policy LU-3.3.2: Corporate Citizenship***

*Support continued corporate citizenship among large institutions, including colleges, universities, hospitals, private schools, and nonprofits. Given the large land area occupied by these uses and their prominence in the community, institutions (along with the District itself) should be encouraged to be role models for smaller employers in efforts to improve the physical environment. This should include a continued commitment to high-quality architecture and design on local campuses, expanded use of green building methods and low-impact development, and adaptive reuse and preservation of historic buildings. 317.8*

#### ***Policy LU-3.3.3: Nonprofits, Private Schools, and Service Organizations***

*Plan, design, and manage large nonprofits, service organizations, private schools, seminaries, colleges and universities, and other institutional uses that occupy large sites within residential areas in a way that minimizes objectionable impacts on adjacent communities. Expansion of these areas should not be permitted if the quality of life in adjacent residential areas is significantly adversely impacted. 317.9*

The proposed changes to the Campus Plan further the above policy objectives of the Land Use Element in the Comprehensive Plan by providing a well-designed new addition to the center of the campus thus minimizing impact on the surrounding neighborhood. The project particularly advances the policy objective of Rehabilitation Before Demolition as the project retains a large portion of a building previously planned for demolition and revitalizes it by adding a high-quality addition that will serve as an architecturally significant centerpiece in a prominent location on campus.

### Transportation Element

#### **Policy T-1.1.3: Context-Sensitive Transportation**

*Design transportation infrastructure to support current land uses as well as land use goals for mixed-use, accessible neighborhoods. Make the design and scale of transportation facilities compatible with planned land uses. Facilities should comply with the District's Complete Streets policy, adopted in October 2010, with an emphasis on pedestrian and bicycle-friendly design. 403.9*

#### **Policy T-1.1.4: Transit-Oriented Development**

*Support transit-oriented development by investing in pedestrian-oriented transportation improvements at or around transit stations, major bus corridors, and transfer points. Encourage development projects to build or upgrade the pedestrian and bicycle infrastructure leading to the nearest transit stop to create last-mile connections. Pedestrian movements and safety should be prioritized around transit stations. 403.10*

#### **Policy T-2.2.1: Multimodal Connections**

*Create more direct connections between the various transit modes. This change is consistent with the federal requirement to plan and implement intermodal transportation systems. Make transit centers into locations of multimodal activity, with welcoming paths for users of all modes and supportive infrastructure, including wide sidewalks, marked crosswalks, and bicycle parking and storage. 409.6*

#### **Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning**

*Integrate bicycle and pedestrian planning and safety considerations more fully into the planning and design of District roads, transit facilities, public buildings, and parks such that residents of each of the District's wards have access to high-quality bicycling and pedestrian facilities. 410.9*

#### **Policy T-2.4.1: Pedestrian Network**

*Develop, maintain, and improve pedestrian facilities. Improve the District's sidewalk system to form a safe and accessible network that links residents across Washington, DC. 411.5*

**Policy T-2.4.2: Pedestrian Safety** *Improve safety and security at key pedestrian nodes throughout the District. Use a variety of techniques to improve pedestrian safety, including textured or clearly marked and raised pedestrian crossings, pedestrian-actuated signal push buttons, high-intensity activated crosswalk pedestrian signals, rectangular rapid flashing beacons, accessible pedestrian signal hardware, leading pedestrian interval timing, and pedestrian countdown signals. 411.6*

The adaptive reuse of the MLC contains numerous improvements that occur outside the building in the form of new enhancements to accessibility and the pedestrian infrastructure. The project includes

new paths and crossings that contribute to seamless connections across campus and to the adjacent neighborhoods and transit options. The design also promotes equity through providing accessibility and walkability for all uses reflective of the diverse and varying abilities within the Gallaudet community, ensuring safe campus access for everyone.

### Environmental Element

#### ***Policy E-1.1.2: Urban Heat Island Mitigation***

*Wherever possible, reduce the urban heat island effect with cool and green roofs, expanded green space, cool pavement, tree planting, and tree protection efforts, prioritizing hotspots and those areas with the greatest number of heat-vulnerable residents. Incorporate heat island mitigation into planning for GI, tree canopy, parks, and public space initiatives. 603.6*

#### ***Policy E-2.1.3: Sustainable Landscaping Practices***

*Encourage the use of sustainable landscaping practices to beautify the District, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity. District government, private developers, and community institutions should coordinate to significantly increase the use of these practices, including planting and maintaining mostly native trees and other plants on District-owned land outside the right-of-ways in schools, parks, and housing authority lands. 605.7*

#### ***Policy E-4.1.1: Maximizing Permeable Surfaces***

*Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce runoff. 615.3*

#### ***Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff***

*Promote an increase in tree planting and vegetated spaces to reduce stormwater runoff and mitigate the urban heat island, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces. 615.4*

#### ***Policy E-7.1.3: Sustainable Landscaping***

*Require sustainable practices for landscaping projects, GI, and restoration projects on District properties that reduce the need for watering and mowing, control the spread of invasive species, increase the use of landscaping for stormwater management, provide habitats, and reduce the use of pesticides and herbicides. Consider using industry best practices and certifications to guide this policy. 630.6*

The MLC renovation and addition furthers these Environmental Element policies in the Comprehensive Plan. The plan to adaptively reuse the structure and utilize green roofs, new native plantings, stormwater features, and additional landscaped areas to the site will reduce the urban heat island and provide for an enhanced greenspace in the center of the existing Gallaudet Mall, which will enhance the existing park-like open space. The enhanced landscaping also serves to meet equity goals by mitigating the urban heat island effect and reducing the impact to heat-vulnerable residents in an area of the District that experiences higher than average temperatures than other areas elsewhere in the District.

## Economic Development Element

### ***Policy ED-2.4.1: Institutional Growth***

*Support growth in the higher education and health care sectors. Recognize the potential of these institutions to provide employment and income opportunities for District residents, and to enhance the District's array of cultural amenities and health care options. 710.4*

The renovation and repurposing of the MLC advances this Economic Development Element policy of Institutional Growth. The renovation enhances the University's educational and cultural amenities by providing new and improved classroom spaces, and the ability to return the deaf archives to campus and dedicate space to the Office of Research and the Deaf Documentary Center will allow the university to continue to serve as an important center for deaf education and culture.

## Education Element

### ***Policy EDU-3.2.2: Corporate Citizenship***

*Support continued corporate citizenship among Washington, DC's large institutions, including its colleges, universities, hospitals, private schools, and nonprofits. This should include a continued commitment to high quality architecture and design on local campuses, expanded use of green building methods and low impact development, and the adaptive reuse and preservation of historic buildings. 1213.3*

### ***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, and economy, and that 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. 1214.7*

The renovation and addition to the MLC furthers the above policy measures within the Educational Element of the Comprehensive Plan. The project promotes the University's corporate citizenship by providing high quality architecture and design, green building methods and adaptive reuse on the Gallaudet campus. Allowing the MLC development also encourages the growth of the University in a way that does not adversely impact the surrounding neighborhoods of Trinidad, Ivy City, and Near Northeast.

## ***Racial Equity Analysis***

Subtitle Z §302.10 (m) states that each campus plan or further processing shall provide "A racial equity analysis relative to the Comprehensive Plan in compliance with the Zoning Commission's current Racial Equity Tool..." The Office of Planning concurs with the Applicant's Comprehensive Plan and Racial Equity Evaluation at [Exhibit 3B](#). The proposal would, on balance, be not inconsistent with the Comprehensive Plan the Generalized Policy Map (GPM) or Future Land Use Map (FLUM).

The GPM designates the Campus as Institutional use, with small portions as Future Planning Analysis Area. The site is designated for Institutional Use. The site is developed with the existing Merrill Learning Center building, given the extensive demolition and additions proposed, any alterations would be expected to address current environmental and stormwater management requirements as appropriate.

The proposal would also be not inconsistent with the Citywide Elements, particularly the Land Use, Transportation, Environmental, Economic Development, and Education Facilities Elements. The site



is within the Upper Northeast Area Element and would address policies related to university campuses.

The applicant has also provided a Racial Equity Analysis. Using the Commission’s Racial Equity Tool, the proposed modification and further processing would not appear to significantly advance or impede the stated policies of the Comprehensive Plan related to racial equity since the requests would not appear to result in an adverse impact on neighboring properties, result in loss of housing or affordable housing opportunities, or lead to other inequities for the neighborhood or planning area as a whole.

### **Community Outreach and Engagement**

The applicant has provided details regarding their community outreach in their Comprehensive Plan Analysis in Exhibit 3B. A Notice of Intent was sent to property owners within 200 feet of the property and the affected ANCs on July 9, 2024. The applicant team also met with ANC 5D Zoning and Development Committee on September 19, 2024, and ANC 5D Committee of the Whole on October 22, 2024.

### **Disaggregated Data Regarding Race and Ethnicity**

The Comprehensive Plan 2021 update recognizes that advancing equity requires a multifaceted policy approach. Equitable development is a participatory approach for meeting the needs of underserved communities through policies and/or practices that reduce and ultimately eliminate disparities while fostering places that are healthy and vibrant. Equitable development holistically considers land-use, transportation, housing, environmental, and cultural conditions and creates access to services, healthcare, technology, workforce development, employment opportunities, and education.

The property is within the Upper Northeast Planning area, which has a predominantly Black and a growing Hispanic population (see table below). Overall, the population has grown between the 2021-2016 time period and most racial or ethnic groups saw an increase, including Hispanic and Two or more races, although the Black alone population decreased.

***Table 1: Population/Race or Ethnicity Districtwide and in the Planning Area***

<b>Race or Ethnicity</b>	<b>Districtwide (2012-2016)</b>	<b>Upper Northeast (2012-2016)</b>	<b>Upper Northeast %</b>	<b>Districtwide (2018-2022)</b>	<b>Upper Northeast (2018-2022)</b>	<b>Upper Northeast %</b>
<b>Total Population</b>	659,009	<b>70,682</b>	<b>100%</b>	670,587	<b>73,167</b>	<b>100%</b>
<b>White</b>	266,035	<b>12,983</b>	<b>18%</b>	265,633	<b>15,917</b>	<b>22%</b>
<b>Black</b>	318,596	<b>50,450</b>	<b>71%</b>	297,101	<b>46,405</b>	<b>63%</b>
<b>Asian</b>	24,036	<b>1,351</b>	<b>2%</b>	27,067	<b>1,961</b>	<b>3%</b>
<b>American Indian and Alaskan Native</b>	2,174	<b>438</b>	<b>1%</b>	2,209	<b>436</b>	<b>1%</b>

<b>Native Hawaiian and Other Pacific Islander</b>	271	<b>12</b>	<b>0%</b>	420	<b>96</b>	<b>0%</b>
<b>Some other race</b>	29,650	<b>3,673</b>	<b>5%</b>	30,879	<b>4,092</b>	<b>6%</b>
<b>Two or more races</b>	18,245	<b>642</b>	<b>3%</b>	47,278	<b>4,260</b>	<b>6%</b>
<b>Hispanic or Latino</b>	69,106	<b>6,799</b>	<b>18%</b>	77,168	<b>8,278</b>	<b>22%</b>

### Median Income

Median income for the planning area is \$82,016, which is less than the Districtwide median household income. The gap between White and Asian residents and other groups is significant. Although the data indicates that the median incomes in the planning area have risen between the two time periods, other groups such as Black and Hispanic / Latino continue to have median incomes that are significantly less than the highest earning White and Asian households.

***Table 2: Median Income Districtwide and in the Far Northeast/Far Southeast Planning Area***

	<b>Districtwide (2012-2016)</b>	<b>Upper Northeast (2012-2016)</b>	<b>Districtwide (2018-2022)</b>	<b>Upper Northeast (2018-2022)</b>
<b>Median Household Income</b>	\$72,935	<b>\$55,720</b>	\$101,722	<b>\$82,016</b>
<b>White</b>	\$119,564	<b>\$107,152</b>	\$160,745	<b>\$158,586</b>
<b>Black or African American</b>	\$40,560	<b>\$47,712</b>	\$57,076	<b>\$69,018</b>
<b>American Indian and Alaskan Native</b>	\$51,306	<b>N/A</b>	\$60,390	<b>\$65,718</b>
<b>Asian</b>	\$91,453	<b>\$70,238</b>	\$123,660	<b>\$158,377</b>
<b>Some other races</b>	\$41,927	<b>\$38,781</b>	\$61,851	<b>\$49,106</b>
<b>Two or more races</b>	\$83,243	<b>\$78,598</b>	\$108,455	<b>\$82,994</b>

<b>Hispanic Latino</b>	<b>or</b>	\$60,848	<b>\$47,581</b>	\$94,203	<b>\$54,228</b>
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### **Age / Special Populations**

The population of the planning area is younger than the District as a whole. Persons under 18 years in the planning area are 20.9% of the population compared to 18.5% Districtwide. The planning area also has a higher rate of residents who are 65 years or older, and a higher rate of residents with a disability than the rest of the District. The higher rate of the planning area may be impacted by the presence of the University as it is the premier institution for deaf and hard of hearing students globally with all programs and services designed to accommodate deaf and hard of hearing individuals.

***Table 3: Age/Special Populations in the District and the Planning Area***

	<b>Districtwide (2012-2016)</b>	<b>Upper Northeast (2012-2016)</b>	<b>Districtwide (2018-2022)</b>	<b>Upper Northeast (2018-2022)</b>
<b>Persons 65 or Older</b>	11.4%	<b>14.4%</b>	12.6%	<b>13.6%</b>
<b>Persons Under 18</b>	17.4%	<b>19.6%</b>	18.5%	<b>20.9%</b>
<b>Disability Rate</b>	11.3%	<b>15.5%</b>	10.98%	<b>13.75%</b>

### **Zoning Commission Evaluation Factors**

- *When considering the following themes/questions based on Comprehensive Plan policies related to racial equity, what are the anticipated positive and negative impacts and/or outcomes of the zoning action? Note: Additional themes may also apply.*

<b>Factor</b>	<b>Question</b>	<b>OP Response</b>
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	Neither the proposed modification nor the boundary expansion would result in the direct displacement of existing residents or businesses.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	Indirect displacement as a result of this campus plan amendment is not anticipated.  The site of the MLC is not a housing site and the full demolition of the MLC would have resulted in a public green space with terraced amphitheater seating. The University has worked closely with the neighborhood to ensure that impacts of the MLC remaining a library would not result in harm to the neighborhood.
Housing	Will the action result in changes to: ▪ Market Rate Housing	The request would have no impact on housing.

Factor	Question	OP Response
	<ul style="list-style-type: none"> <li>▪ Affordable Housing</li> <li>▪ Replacement Housing</li> </ul>	
Physical	<p>Will the action result in changes to the physical environment such as:</p> <ul style="list-style-type: none"> <li>▪ Public Space Improvements</li> <li>▪ Infrastructure Improvements</li> <li>▪ Arts and Culture</li> <li>▪ Environmental Changes</li> <li>▪ Streetscape Improvements</li> </ul>	The proposal includes public space improvements and arts and cultural amenities serving the University and deaf community that would have a positive impact. The redevelopment will be required to comply with the most current standards and codes for stormwater infrastructure.
Access to Opportunity	<p>Is there a change in access to opportunity?</p> <ul style="list-style-type: none"> <li>▪ Job Training/Creation</li> </ul> <p>Healthcare</p> <ul style="list-style-type: none"> <li>▪ Addition of Retail/Access to New Services</li> </ul>	The proposal would include the addition of a small café and provide an opportunity for local employment.
Community	How did community outreach and engagement inform/change the zoning action?	The Applicant's filings indicate the extensive community discussions that took place, which significantly impacted the proposed conditions.

## VI. FURTHER PROCESSING OF A CAMPUS PLAN

### ***101.1 Education use by a college or university shall be permitted as a special exception subject to review and approval by the Zoning Commission under Subtitle X, Chapter 9 after its determination that the use meets the applicable standards and conditions of this chapter.***

The initial campus plan approval for Gallaudet University occurred in 1972, with the most recent update to the campus plan occurring under ZC 12-15. The final order for the approved campus plan states:

Pursuant to 11 DCMR § 210.1, the Commission finds that Gallaudet University is an academic institution of higher learning that was chartered as such by an Act of Congress. (Ex. 20, p. 7.) Gallaudet was formally established in 1856 as a small school for deaf and blind children. It was later incorporated as the Columbia Institution for the Instruction of the Deaf and Blind. Pursuant to Congressional approval, the college division was added in 1864. Gallaudet became the first, and was, for almost a century, the only institution of higher learning specifically designed to meet the needs of the deaf population. Gallaudet became a University in 1986 upon the passage of the Education of the Deaf Act. Gallaudet is fully accredited and authorized to confer degrees.

The proposed campus plan amendment retains an existing building previously noted for demolition, and with an extensive renovation, provides for educational uses within the building in line with the Campus Plan approval.

***101.2 The uses shall be located so that they are not likely to become objectionable to neighboring property because of noise, traffic, parking, number of students, or other objectionable conditions.***

Noise

The proposed project should not result in increased noise to any neighboring properties. The MLC is located at the center of the Gallaudet campus and given the use as an academic building it is unlikely to generate any noise impacts. During construction, the activity will be contained within campus, and demolition work is planned to occur during the summer while classes are not in session to minimize impact to both students, and neighboring residents and businesses.

Traffic, Parking, and Loading

The MLC renovation should not result in any impacts on traffic and parking. The building is existing and does not contain any parking spaces. The renovation will reduce the size of the structure. The proposed renovations do not include loading facilities. A more detailed analysis and recommendation regarding the project's traffic, parking, and loading impacts will be provided in the District Department of Transportation's report.

Number of Students

The preservation and renovation of the MLC building would not have an impact on the number of students on campus. The building will be reduced in size compared to the pre-renovation square footage, with improved functionality and new spaces for students within the building it will likely draw more students to the Gallaudet Mall area given the building is currently unoccupied.

***101.3 Any commercial use customarily incidental to a university use in an R, RF, or RA zone, or as an adjunct use to a university building, shall be subject to the following conditions:***

- (a) There shall be a demonstrated and necessary relationship between the use and the university functions;***

As part of the renovations to the MLC, a new glass addition will be constructed in the area the existing above ground portion of the building is located. This 15,000 square foot space will serve as a lobby and informal gathering space and includes a small café measuring less than 3,800 square feet. The café is intended to provide a campus amenity for use by students, faculty, staff, and visitors to campus.

- (b) The total floor area of all commercial uses, including basement or cellar space, shall occupy no more than ten percent (10%) of the gross floor area of the total campus plan floor area; and***

The applicant has provided a supplemental statement in Exhibit 10 and a campus wide breakdown of the commercial GFA and percentages of commercial use in Exhibit 10A. The total floor area of the commercial areas on campus with the addition of the café space is 6% meeting the criteria above.



- (c) *The commercial use shall be located so that it will not become objectionable to non-university residential neighbors due to hours of operation, noise, parking, loading, lighting, trash, or other operational characteristics that are not customarily associated with a residential use.*

The café use will be located in the center of campus and does not involve vehicular loading operations and is not anticipated to generate vehicular trips.

**101.4 *The campus plan process shall not serve as a process to create general commercial activities or developments unrelated to the educational mission of the applicant or that would be inconsistent with the Comprehensive Plan.***

The café space within the proposed renovated MLC will serve the needs of the campus community and not intended to attract customers beyond students, faculty, and staff. All other uses within the structure are all institutional uses consistent with Gallaudet’s educational mission and are not inconsistent with the Comprehensive Plan.

**101.5 *The maximum height and the maximum total floor area ratio (FAR) of all buildings and structures on the campus shall be as set forth in the following table:***

TABLE X § 101.5: MAXIMUM HEIGHT AND TOTAL FLOOR AREA RATIO OF ALL BUILDINGS AND STRUCTURES		
Zone	Maximum Height (Feet)	Maximum Floor Area Ratio
R and RF	50	1.8
RA-1	50	1.8
RA-2	60	1.8
RA-3, RA-4, and RA-5	90	3.5

The applicant has provided an analysis of the existing and proposed Floor Area Ratio of all buildings and structures on campus before and after the renovation of the MLC. Due to the small change resulting in a decrease in building area, the FAR for the campus remains at .60, which is well below the 1.8 FAR maximum for the campus. The proposed glass atrium addition is 45 feet, lower than the 50 foot maximum height.

**101.6 *Because of permissive increases as applicable to normal bulk requirements in the low-density zones regulated by this title, it is the intent of this subsection to prevent unreasonable campus expansion into improved low-density zones.***

No expansion of the campus is proposed into improved low-density zones. With the proposed changes to the Campus Plan the FAR will remain the same at .06.

**101.7 *In calculating floor area ratio (FAR), the land area shall not include public streets and alleys, but may include interior private streets and alleys within the campus boundaries.***

The FAR calculation does not include public streets or alleys.

***101.8 As a prerequisite to requesting a further processing for each college or university use, the applicant shall have submitted to the Zoning Commission for its approval a plan for developing the campus as a whole, showing the location, height, and bulk, where appropriate, of all present and proposed improvements including, but not limited to, the following:***

***(a) Buildings and parking and loading facilities;***

***(b) Screening, signs, streets, and public utility facilities;***

***(c) Athletic and other recreational facilities; and***

***(d) A description of all activities conducted or to be conducted on the campus, and of the capacity of all present and proposed campus development.***

The proposed changes to the campus plan involve retaining a building proposed for demolition on the Campus Plan, with partial demolition and addition to the structure to better serve campus needs. The changes to the overall Campus Plan are negligible. The applicant has provided detailed drawings, floorplans, and renderings of the proposed changes in Exhibits 3A1, 3A2, and 3A3.

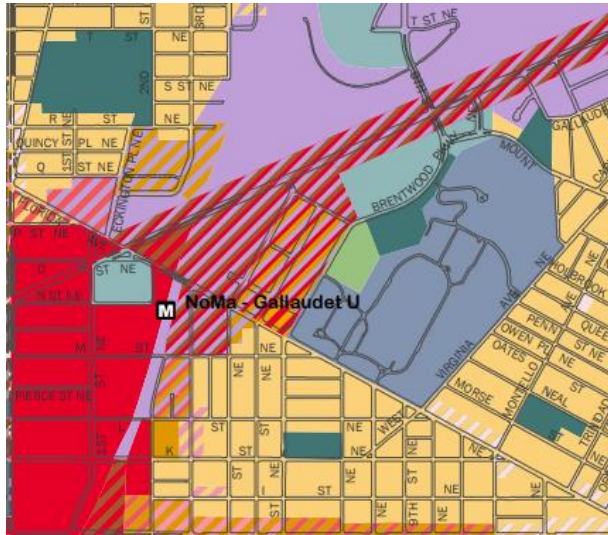
***101.9 The further processing of specific buildings, structures, and uses within an approved campus plan shall be processed as a special exception unless the campus plan approval was included in an order granting a first-stage planned unit development (PUD) for the campus, in which case the further processing shall be in the form of second-stage planned unit development applications filed consistent with the conditions of the approved campus plan/PUD.***

The proposed further processing is being reviewed as a special exception. Gallaudet University is not subject to a PUD.

***101.10 Within a reasonable distance of the college or university campus, and subject to compliance with Subtitle X § 101.2, the Zoning Commission may also permit the interim use of land or improved property with any use that the Zoning Commission may determine is a proper college or university function. The land need not be included in the campus plan. When a major new building that has been proposed in a campus plan is instead moved off-campus, the previously designated site shall not be designated for, or devoted to, a different major new building unless the Zoning Commission has approved an amendment to the campus plan applicable to the site; provided, that for this purpose a major new building is defined as one specifically identified in the campus plan.***

This section is not applicable. No interim off-campus use of land is proposed.

***101.11 In reviewing and deciding a campus plan application or new building construction pursuant to a campus plan, the Zoning Commission shall consider, to the extent they are relevant, the policies of the District Elements of the Comprehensive Plan.***



Comprehensive Plan Future Land Use Map



Comprehensive Plan Generalized Policy Map

The 2021 Comprehensive Plan Future Land Use Map identifies the Gallaudet University Campus for Institutional use, which *“Includes land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions.”* The MLC renovations would not be inconsistent with this designation.

The generalized policy map designates the entire campus for Institutional use, which includes colleges and universities. The MLC renovations and proposed uses within the building would not be inconsistent with this designation.

***101.12 As an integral part of the application requesting approval of new building construction pursuant to a campus plan, the college or university shall certify and document that the proposed building or amendment is within the FAR limit for the campus as a whole, based upon the computation included in the most recently approved campus plan and the FARs of any other buildings constructed or demolished since the campus plan was approved.***

The applicant has provided computations on the existing and proposed FAR for the entire campus in Exhibit 10 and Exhibit 10A. As further described in these exhibits, the campus remains at .60 FAR, well below the limit of 1.8 FAR.

## **VII. AGENCY COMMENTS**

As of the date of this report, no comments from any District agency have been added to the record.

## **VIII. ANC COMMENTS**

As of the date of this report, no comments from the adjacent ANCs have been added to the record.

## **IX. COMMUNITY COMMENTS**

As of the date of this report, no comments from the community had been added to the record.