



MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: ^{JLS}
Jennifer Steingasser, Deputy Director

DATE: May 26, 2017

SUBJECT: ZC-16-18A Request for Special Exception for further processing to construct a surgical pavilion building at 3800 Reservoir Road, N.W. (Square 1321, Lots 824, 825, 826, and 833)

I. SUMMARY RECOMMENDATION

The Office of Planning recommends approval of the requested special exception for further processing of the approved Georgetown University 2017-2036 Campus Plan to permit the construction of the new surgical pavilion building and related site changes pursuant to Subtitle X § 101.

OP recommends approval of the requested special exception relief for the proposed penthouses pursuant to Subtitle C § 1504 and the proposed retaining wall pursuant to Subtitle C § 1402. OP requested more information related to the retaining wall as noted in Section VI which the Applicant provided to OP on May 24, 2017. OP recommends the information be provided to the official record.

OP also recommends approval of the Applicant’s request to allow flexibility for minor modifications resulting from conditions required by the Old Georgetown Board and Commission of Fine Arts.

Should the Zoning Commission approve this application, the Order would not be issued until the Zoning Commission’s Order for the Campus Plan is issued.

II. APPLICATION IN BRIEF

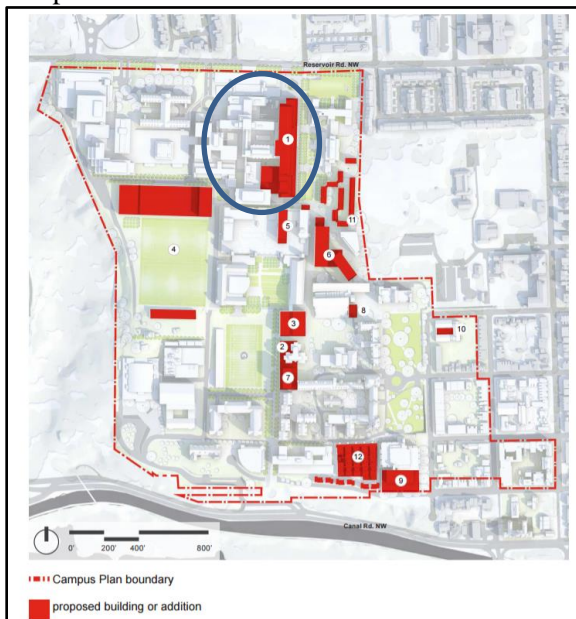
Applicant	MedStar Georgetown University Hospital (MGUH)
Location	3800 Reservoir Road, N.W.
Zoning	R-3
Proposal	<p>The Applicant proposes construction of a new six-story MGUH surgical pavilion, as anticipated under the approved 2017-2036 Campus Plan. The new building would be certified LEED Silver and would have a green roof, in keeping with the approved Campus Plan. The proposed building would be located to the east of the hospital where there is currently a surface parking lot. The building would be 90 feet tall at its maximum height with mechanical penthouses of 18 feet 6 inches maximum height. The building would have 450,000 SF of gross floor area.</p> <p>The project provides 644 spaces of below grade parking located to the east of the new building where there is currently surface parking. There would be a new entry plaza with steps and green space along Reservoir Road. The existing at-grade helipad would</p>

	be relocated to the roof of the new building. There would be a retaining wall along the south side of the new east-west connector road that would range in height from 1 foot to 24 feet at its highest point to address grade changes; the wall would replace sections of an existing wall.
Relief Requested	<ul style="list-style-type: none"> • Special exception relief pursuant to Subtitle X § 101 for further processing of the university’s 2017-2036 Campus Plan for the construction of the new surgical pavilion; • Special exception relief for penthouses pursuant to Subtitle C § 1504; • Special exception relief for retaining wall height pursuant to Subtitle C § 1402; and • Flexibility to allow minor modifications resulting from possible conditions required by the Old Georgetown Board and Commission of Fine Arts.

III. SITE DESCRIPTION

Location: 3800 Reservoir Road, N.W.
 Legal Description: Square 1321, Lots 824, 825, 826, and 833
 Ward/ ANC: 2E
 Zoning: R-3
 Historic District: Within the Georgetown Historic District

The MedStar Georgetown University hospital and medical complex are located within the university campus, which is on the west side of Georgetown. The campus is generally bounded by Prospect Street, N.W. on the south, Glover-Archbold Park on the west, Reservoir Road on the north and the Cloisters condominium development and the Convent of Visitation on the east. The medical complex is on the north side of campus and includes research and academic facilities and the MedStar hospital. Academic, administrative, athletic and dormitory buildings are primarily located on the southern two-thirds of the campus.



Georgetown University Campus Plan 2017-2036
EXHIBIT L: PROPOSED TWENTY-YEAR DEVELOPMENT PLAN

BUILDING 1 = NEW SURGICAL PAVILION

IV. HISTORY OF THE GEORGETOWN UNIVERSITY CAMPUS PLAN

1989 Campus Plan (BZA Case No. 15302)

10 year term, 5,627 undergraduate students, add 925 beds on campus, approved 1.6 FAR (actual 1.12 FAR)

2000 Campus Plan (BZA Case No. 16566-F)

10 year term, 6,016 undergraduate students, 5,053 beds on campus, approved 1.41 FAR (actual 1.22 FAR)

2010 Campus Plan (ZC Order No. 10-32)

7 year term (not adopted until 2012), overall headcount cap of 14,106 students, cap of 6,675 undergraduate students, increase on-campus housing by 450 total beds, approved 1.45 FAR (actual 1.24 FAR)

2017 Campus Plan (ZC Order No. 16-18; approved but order not yet issued)

20 year term; overall headcount cap remains at 14,106 with 6,675 undergraduate students, increase on-campus housing by 244 beds, approved 1.54 FAR

Two further processing applications were approved under the 2010 Campus Plan:

1. 2013 ZC Case No. 10-32A: construction of a new residence hall and use of former Jesuit residence a student housing
2. 2014 ZC Case No. 10-32B: addition to Lombardi Cancer Center

V. CAMPUS PLAN FURTHER PROCESSING REVIEW

University or college use in a low or moderate density residential zone is permitted as a special exception use as part of a campus plan. Within prescribed limits, additional density and height are achievable under a campus plan and accessory uses incidental to the university may be permitted that would not otherwise be permitted in a residential zone, such as retail, restaurants, commercial and limited industrial uses. Prior to requesting a special exception for each university use or new building, a campus plan shall have been approved by the Zoning Commission for developing the campus as a whole; this stage is referred to as further processing.

Subtitle X Section 101 of the Zoning Regulations provides standards for reviewing university campus plans and further processing applications. The Office of Planning's analysis of the application against those criteria is below.

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 after its determination that the use meets the applicable standards and condition of this chapter.

Georgetown University is an educational use that was determined to meet the standards of the zoning regulations through an approved Campus Plan , case ZC 16-18 .

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.

The proposed new MGUH surgical pavilion would be an addition to the east of the existing hospital where there is currently a surface parking lot. GMUH has committed to the mitigation of noise, traffic,

and other potential community nuisances during the building construction and after it is completed in collaboration with the Georgetown Community Partnership (GCP). The Applicant provided a Comprehensive Transportation Review, a Transportation Demand Management Plan, a Construction Management Plan (Exhibits 21F1 and 21F2), a helicopter noise abatement strategy, and a Traffic Mitigation Plan that were reviewed by DDOT and GCP. Overall there will be no net change in the parking spaces provided but the parking will be better designed to encourage more parking on campus rather than in the neighborhood. The Applicant proposes changes to the internal circulation plan that were evaluated as part of the Campus Plan Comprehensive Transportation Review (CTR) including include changes to the entrance gates and signals along Reservoir Road, the new east-west access road, and corresponding wayfinding signage for better vehicle and traffic management and flow (see Exhibit 8, Sheet 3.4).

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;*
- 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*
- 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.*

Not applicable for this application.

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 proposal does not include commercial developments that are inconsistent with the Comprehensive Plan.

101.5 The following development standards shall apply to the maximum total density of all buildings and structures on the campus in an R, RF, RA, or RC-1 zone:

TABLE X § 101.5: MAXIMUM TOTAL DENSITY OF ALL BUILDINGS AND STRUCTURES

Zone	Maximum Height (Feet)	Maximum Floor Area Ratio
All R and RF zones	50	1.8
RA-1, RA-2, RA-6, RA-7, RA-8, RC-1	50	1.8
RA-3, RA-4, RA-5, RA-9, RA-10	90	3.5

The proposed building complies with the maximum total density development standards above. Subtitle D Section 207.6 allows that an institutional building may be ninety feet (90 ft.) in height if the building is set back from lot lines at least one foot for each foot of height in excess of the above fifty foot (50 ft.) height limit. The Applicant proposes a building of 90 feet consistent with the requirements of D-207.6 with a mechanical penthouse with a maximum height of 18 feet 6 inches, which is permitted under the regulations. With the new surgical pavilion, the proposed FAR will be 1.33, which would be below the 1.54 FAR approved in the Campus Plan.

The Applicant has requested special exceptions related to the proposed penthouses and retaining wall, which OP has reviewed in Section VI and recommends approval of the relief.

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.

The proposed surgical pavilion is in keeping with the intent of the zoning regulations. The general location of the pavilion is identified within the established boundaries of the approved campus plan. .

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 included in the campus plan did not include public streets or alleys but did include interior streets and driveways within the campus boundaries and the FAR for this proposal was calculated the same way.

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 University previously submitted a complete Campus Plan application, which included proposed improvements including the surgical pavilion. The Campus Plan was approved by the Zoning Commission on December 1, 2016.

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 Applicant is requesting a special exception for future processing of the proposed MGUH surgical pavilion, which was included in the approved campus plan.

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.

The Applicant is not proposing any interim use of property.

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.

The proposal is not inconsistent with the Comprehensive Plan, including policies from the Land Use, Environmental Protection, and Education Citywide Plan Elements and the Near Northwest Area Element as well as the Comprehensive Plan's land use maps. For a complete analysis of the campus plan and its relation to the Comprehensive Plan, please refer to Sections VIII and IX of this report.

The extensive collaboration between the University, the Applicant, and the GCP continues to be an excellent vehicle to balance the various elements of the Comprehensive Plan and the goals and needs of the University and the hospital and the broader community. Notably, this continued collaboration has embodied the land use policy L.U. 2.3.5 which encourages “*institutions and neighborhoods to work proactively to address issues such as traffic and parking, hours of operation, outside use of facilities, and facility expansion.*”

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 Zoning Commission recently approved the 2017 Campus Plan which proposed an overall FAR of 1.54 and the zoning regulations allow an FAR of 1.8. The additional gross floor area of the proposed surgical pavilion would result in an FAR of 1.33, which would be within the FAR limit for the campus as a whole.

101.13 Pursuant to Subtitle Z § 405.1, as soon as the application is accepted, the Office of Zoning shall refer the application to the Office of Planning, the Department of Transportation, and the Department of Energy and Environment for review and written reports.

The District Department of Transportation has indicated that they will be filing a separate report and the Department of Energy and Environment has reviewed the application.

101.14 Approval of a campus plan shall be based on the determination by the Zoning Commission that the application will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps, and will not tend to affect adversely the use of neighboring property, in accordance with the Zoning Regulations and Zoning Maps, subject to the special conditions specified in this section.

OP commends the collaborative work done by the GCP and University to ensure that the recently approved campus plan and the proposed surgical pavilion will not affect adversely the use of neighboring property in accordance with the expectations of residents, the Comprehensive Plan and zoning

regulations. Based on the review of the application and community support, OP finds that the proposed further processing of the surgical pavilion is in keeping the Zoning Regulations or Zoning Map and would not adversely impact the use of neighboring property.

101.15 Small deviations from plans approved under further processing that are determined necessary by the Zoning Administrator for compliance with life, safety, or building codes, may be permitted without an amendment to a further processing provided the deviation does not result in an increase in gross floor area of more than four-hundred and fifty square feet (450 sq. ft.) and the addition shall only be used for purposes of ingress, egress, or handicap access.

101.16 A further processing of a campus building shall not be filed simultaneously with a full campus plan application. However, an amendment to an approved campus plan may be considered simultaneously with the further processing if determined necessary by the Zoning Commission.

VI. SPECIAL EXCEPTION RELIEF

Subtitle C Section 1402 SPECIAL EXCEPTION FROM RETAINING WALL REQUIREMENTS

1402.1 Retaining walls not meeting the requirements of this section may be approved by the Board of Zoning Adjustment as a special exception pursuant to Subtitle X. In addition to meeting the general conditions for being granted a special exception as set forth in that subtitle, the applicant must demonstrate that conditions relating to the building, terrain, or surrounding area would to make full compliance unduly restrictive, prohibitively costly, or unreasonable.

The Applicant proposes a new east-west access road across the northern section of campus to provide better connectivity on campus. A proposed retaining wall would be located along the south side of the new east-west road and would replace sections of an existing wall, which is 23.1 feet at its tallest point. The new wall would be 24 feet at its tallest point and would be constructed of concrete panel lagging between soldier piles with a partial green screen.

OP recommends approval of the special exception relief related to the height of the wall which is needed to address existing grade issues. The wall would replace sections of an existing wall of similar height that currently exists without issues. The wall would be entirely internal to the campus and should not have an impact on neighboring properties. OP requested that the Applicant provide more information including photos of current conditions showing the existing wall and plans and renderings of the proposed wall; the information was provided on May 24 and OP recommends it be filed into the official record.

1504 RELIEF TO PENTHOUSE REQUIREMENTS

1504.1 Relief to the requirements of Subtitle C §§ 1500.6 – 1500.10 and 1502 may be granted as a special exception by the Board of Zoning Adjustment subject to Subtitle X, Chapter 9 and subject to the following considerations:

- (a) The strict application of the requirements of this chapter would result in construction that is unduly restrictive, prohibitively costly, or unreasonable, or is inconsistent with building codes;*
- (b) The relief requested would result in a better design of the roof structure without appearing to be an extension of the building wall;*
- (c) The relief requested would result in a roof structure that is visually less intrusive;*

- (d) Operating difficulties such as meeting D.C. Construction Code, Title 12 DCMR requirements for roof access and stairwell separation or elevator stack location to achieve reasonable efficiencies in lower floors; size of building lot; or other conditions relating to the building or surrounding area make full compliance unduly restrictive, prohibitively costly or unreasonable;*
- (e) Every effort has been made for the housing for mechanical equipment, stairway, and elevator penthouses to be in compliance with the required setbacks; and*
- (f) 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 proposed penthouses will house the required mechanical equipment and egress stairwells that are necessary for hospital operations. The Applicant has requested relief from three of the zoning regulations related to the mechanical penthouses:

- 1) Setbacks;
- 2) One penthouse enclosure; and
- 3) Walls of equal height.

In two areas of the roof, the proposed penthouses do not comply with the setback regulations. The Applicant has requested setback relief for a small eight foot section at the north end of the mechanical penthouse that would have a zero setback from an internal open court. Hospitals require an exceptionally large amount of mechanical equipment and the Applicant explored all other possible locations for the equipment including the lower and below grade levels. The Applicant is proposing one main mechanical penthouse to accommodate all the required equipment. Because the new pavilion building roof is narrow and ample space is required to accommodate a helipad, the Applicant needs the extra square footage for the necessary mechanical equipment and is requesting relief for this eight foot area. Because the location is against the internal open court there would be no impact on neighboring residential property.

The other area of setback relief requested is for one of the two 11 foot tall enclosed emergency egress stairwells required for the proposed rooftop helipad. The new rooftop helipad would replace an existing at-grade helicopter landing pad that is located more than 750 feet from the Emergency Department of the hospital. Federal Aviation Administration (FAA) guidelines require that the helipad have two means of egress located a certain distance apart. One egress stairwell would be located at the north side of the helipad and mechanical penthouse and has the required setback. Because the building is narrow, there is not enough room to locate the second stairwell on the east or west side of the helipad. The Applicant proposes that the stairwell be located on the south side of the helipad, where there would be zero setback due to limited space constraints. The location is inward to the campus and would have no impact on neighboring residential property.

The Applicant is proposing four different penthouse heights:

- 18'6" for the main mechanical penthouse,
- 14'6" on east side of main mechanical penthouse,
- 11' for the egress stairwell enclosures, and
- 6'8" for the helipad platform.

For the building's proposed penthouse design, the Applicant contended with numerous factors including extensive hospital mechanical needs detailed in Exhibit 7, FAA regulations for a rooftop helipad, the narrow building footprint, required design review, and critical community input. Per the above review criteria for penthouses, the Applicant tried to meet the myriad requirements and comply with the single penthouse enclosure and uniform height requirement, but was unable to do so without needing additional setback relief or eliminating the helipad.

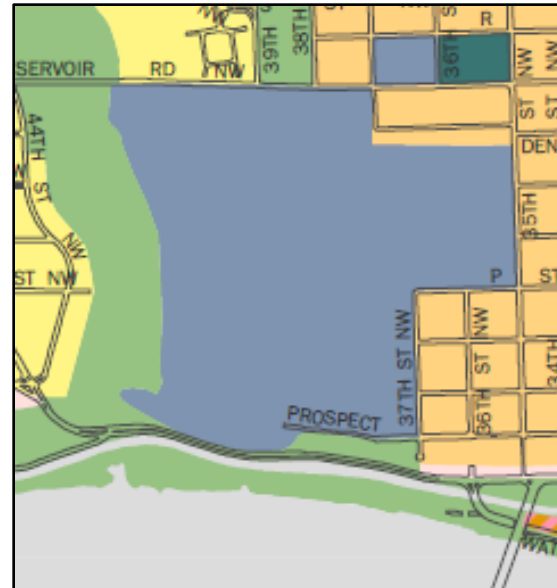
Based on all the factors and requirements of this project, the need for the helipad to be near the emergency department and the proposed locations being away from the neighboring properties, OP finds that the penthouse relief meets the review criteria and recommends approval of the special exception.

Finally, the Applicant has received concept approval from the Old Georgetown Board (OGB) and Commission of Fine Arts (CFA) and has requested flexibility to permit minor modifications to the design to comply with possible future conditions required by OGB or CFA.

VII. COMPREHENSIVE PLAN LAND USE MAPS



Generalized Policy Map (Institutional Use)



Future Land Use Map (Institutional Use)

The Comprehensive Plan's Generalized Policy Map labels the campus as Institutional Use areas and the Future Land Use Map labels the campus as appropriate for Institutional Uses. The University use is consistent with these designations.

As noted above, the Comprehensive Plan Future Land Use Map identifies the residential neighborhoods surrounding the University as moderate density residential to the east and low density residential north of the campus. The Comprehensive Plan Generalized Policy Map identifies all residential areas surrounding Georgetown University as Neighborhood Conservation Areas which anticipates that institutional uses will be developed at a moderate scale but also establishes an explicit "guiding philosophy" of "conserving and enhancing neighborhoods within this category."

VIII. COMPREHENSIVE PLAN POLICIES

The proposed campus plan is not inconsistent with policies of the Land Use, Environmental Protection and Education Citywide Plan Elements, or the Near Northwest Area Element of Comprehensive Plan.

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-3.2.1: Transportation Impacts of Institutional Uses

“Support ongoing efforts by District institutions to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, public transportation, shuttle service and bicycling; providing on-site parking; and undertaking other transportation demand management measures.”

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 E-3.2.1: Support for Green Building

“Encourage the use of green building methods in new construction and rehabilitation projects, and develop green building methods for operation and maintenance activities.”

Policy EDU-3.2.2: Corporate Citizenship

“Support continued “corporate citizenship” among the city’s large institutions, including its colleges, universities, hospitals, private schools, and non-profits. 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.”

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-3.3.3: Campus Plan Requirements

“Continue to require campus plans for colleges and universities located in residential and mixed use zone districts. These plans should be prepared by the institutions themselves, subject to District review and approval, and should address issues raised by the surrounding communities. Each campus plan should include provisions that ensure that the institution is not likely to become objectionable to neighboring property because of noise, traffic, number of students, or other similar conditions.”

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 NNW-1.1.1: Residential Neighborhoods

“Maintain and enhance the historic, architecturally distinctive mixed density character of Near Northwest residential neighborhoods, including Burleith, Georgetown, Foggy Bottom, Dupont Circle, Sheridan-Kalorama, Logan Circle, Mount Vernon Square, and Shaw.”

The hospital's proposed surgical pavilion and related changes to the medical complex and university campus, which were created with GCP collaboration with and consensus, would further the Comprehensive Plan policies cited above. The project proposes to manage transportation demand, improve community relations, increase sustainability and energy efficiency, and improve campus open space and student spaces, while allowing the hospital to meet and improve their programmatic and space needs.

IX. COMMENTS OF OTHER DISTRICT AGENCIES

The Department of Transportation has indicated their support of the proposed plan and will submit a report under separate cover.

X. COMMUNITY AND OTHER AGENCY COMMENTS

The Applicant provided a revised list of conditions agreed to by the Applicant and Georgetown Community Partnership (Exhibit 7B and Exhibit 21D).

The Commission of Fine Arts has given concept approval of the proposal (Exhibit 7D).

There is a request for Party Status in support by the Citizens Association of Georgetown (Exhibit 16).

The Applicant provided the ANC report in support and Construction Management Plan that was developed with the Applicant and Georgetown Community Partnership (Exhibits 21F1 and 21F2).