

April 19, 2021

VIA IZIS

Mr. Anthony J. Hood, Chair
District of Columbia Zoning Commission
Office of Zoning
441 4th Street, N.W., Suite 210
Washington, DC 20001

**Re: Final Supplemental Submission; Case No. 20-08 - Howard University 2020
Central Campus Plan**

On behalf of Howard University (“Applicant”), this supplemental submission includes a previously submitted document in the record (Ex. 32A) detailing the University’s compliance with its current campus plan conditions as well as pertinent subsequent campus plan amendment orders. We are resubmitting it in response to Commissioner Miller’s request for a status report on compliance with the University’s affordable housing target. The condition is addressed on page 6 of the attached, paragraph B.(2), and copied here:

The University will make best efforts to meet a goal of developing a total of 50-100 housing units at 30%-60% AMI within the Extraction Properties, the Campus Plan boundaries or other Howard University property. --- Complies. The University is currently in negotiations on several development projects, with more in the pipeline. To date, projects under negotiation suggest a total of 51 IZ units (per code). To date, the University has negotiated the option to incrementally add 54 additional affordable housing units (above the IZ nts).

Project	Address	Total# Units	# of IZ Units (per code)*	% Affordable Units	# Affordable Units Above IZ**
HURB-1	1840 7th Street, NW	203	17	8.4%	20
9th & W	9th & W Streets, NW	315	26	8.3%	14
Effingham Apts.	2711-2719 Georgia Ave, NW	95	8	8.4%	5
Bond Bread/WRECO	2112 Georgia Ave, NW	450	36	8.0%	TBD
Howard Manor	654 Girard Street, NW	80	0	-	15
TOTAL		1143	51		54

ALL DATA CIRCA 01/11/2021

* All IZ and incremental affordable units at 60% AMI

** Through ongoing real estate transactions, Howard continues to negotiate various options to add units above IZ requirements

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Thank you in advance for your consideration.

Sincerely,



Cynthia A. Giordano, Esq.

cc: via E-Mail:Advisory Neighborhood Commission 1B (1b@anc.dc.gov; 1B01@anc.dc.gov)

Joel Lawson, Office of Planning (Joel.Lawson@dc.gov)

Maxine Brown Roberts, Office of Planning (maxine.brownroberts@dc.gov)

Kelsey Bridges, Department of Transportation (kelsey.bridges@dc.gov)

**COMPLIANCE WITH CHAPTER 1 OF SUBTITLE X AND
CHAPTER 3 OF SUBTITLE Z OF THE DISTRICT OF COLUMBIA
ZONING REGULATIONS**

I HEREBY CERTIFY that the 2020 Howard University Central Campus Master Plan (“2020 Campus Plan” or “Campus Plan”) complies with the process and requirements set forth in Chapter 1 of Subtitle X and in Chapter 3 of Subtitle Z of the Zoning Regulations for the review of a Campus Plan in the District of Columbia.

1. **Application (Subtitle Z, Sections 302.5 and 302.10(a)):** The completed application form for the 2020 Campus Plan is included with the application materials.
2. **Authorization (Subtitle Z, Section 302.4):** A letter from Howard University (“Howard” or the “University”) authorizing Saul Ewing Arnstein Lehr LLP file the application is included with the application materials.
3. **Notice (Subtitle Z, Sections 302.6 — 302.7):** The Certificate of Notice herein states that a Notice of Intent to File a Campus Plan Application was mailed to Advisory Neighborhood Commission (“ANC”) ANC 1B, and to the owners of all property within 200 feet of the campus plan boundaries (“Campus” or “Property”) on March 5, 2021, as required by the Zoning Regulations.
4. **ANC Meeting (Subtitle Z, Section 302.8):** The Applicant has been in communication with ANC 1B and has obtained its letter of support.
5. **Plat (Subtitle Z, Section 302.10(b)):** The Surveyor’s plats for the University’s properties included in the Campus Plan boundaries are included with the application and a map including lot and square designations for the Property is included in the Campus Plan, Figures 3.8 & 3.9.
6. **Facilities Plan (Subtitle Z, Section 302.10(c)):** Existing and proposed conditions, as well as anticipated future needs, are discussed in Section 3, Existing Central Campus, and shown in Figure 3.13, and Section 4, Campus Development Plan, and shown in Figure 4.2.
7. **Student Count (Subtitle Z, Section 302.10(d)):** The number of Howard students in the 2019-2020 academic year totaled 9,689. Programs principally located at the Central Campus enroll 8,884 students. Fall 2020 enrollment is shown in Table 2.5. Projected Student Population Growth is shown in Table 4.1. The Howard University Middle School for Math and Science operates within the campus boundary with 294 students enrolled in 6th-8th grades.
8. **Employee Count (Subtitle Z, Section 302.10(e)):** The University has over 2,900 employees. This includes 1,205 faculty, 1,435 staff, and 267 wage/hourly employees. Of the total, there are 374 part time employees. This figure does not include HU Hospital which employs an additional 1,081 full-time and 603 part-time staff for a total of 1,684.
9. **Neighborhood Context (Subtitle Z, Section 302.10(f)):** The Campus neighborhood context is addressed in Section 2.4, Neighborhood Context, and Section 2.5, Community

Relations. Each proposed project in Section 4.2, Campus Development Plan, also contains a narrative on neighborhood context and impacts.

10. **Comprehensive Accessibility (Subtitle Z, Section 302.10(g)):** Transportation planning for the University is addressed in Section 3.5, Existing Circulation and Parking, and Section 4.4 Transportation and Parking Strategy, and corresponding exhibits. A full Comprehensive Transportation Review (“CTR”) was submitted to DDOT in December 2020. A Transportation Demand Management Plan (“TDM”) has been incorporated into the CTR.
11. **Conservation (Subtitle Z, Section 302.10(h)):** Conservation issues, including the treatment of historic resources and sustainability considerations, are addressed in Section 3.2, Campus History and Historic Resources, and Section 4.3, Conservation Strategy and corresponding exhibits. Each proposed project in Section 4.2, Campus Development Plan, also contains a narrative on historic considerations.
12. **Landscape / Open Space (Subtitle Z, Section 302.10(i)):** Campus Landscape and Open Spaces are discussed in Section 3.4, Existing Landscape & Open Space, and in Section 4.4.1, Proposed Landscape & Open Space.
13. **Streetscape Treatment (Subtitle Z, Section 302.10(j)):** Streetscape treatment is discussed in Section 4.4.2, Gateways, Connections and Nodes, and Section 4.5.4, Streetscape Treatment.
14. **Explanation of All Programs on Campus (Subtitle Z, Section 302.10(1)):** Section 2.2, Who We Are, discusses the University’s current programs. Section 4.1.5, The Future Campus, and Section 4.1.6, Interdisciplinary Aggregation, discuss the University’s interdisciplinary approach to academic and campus life programming. Section 4.2, Campus Development Plan, describes proposed developments, which relocate academic and campus life programs based upon synergistic functional requirements to cultivate greater operational efficiency, programmatic synergy, and a more engaging learning experience.
15. **Property Owner List (Subtitle Z, Section 302.10(m)):** The name and addresses of the owners of all property located within two hundred feet (200 ft.) of the Campus Plan boundaries are included in the application materials. Self-stick labels printed with these names and addresses are included with the hard-copy application submitted to the Office of Zoning.
16. **Legal Standards (Subtitle X, Section 101):** Compliance of the Campus Plan with the applicable legal standards set forth in Subtitle X, Section 101 are addressed in the campus Plan as follows:
 - A. Section 101.2 Uses located so they are not likely to become objectionable to neighboring property because of noise, traffic, parking, number of students or other objectionable conditions: See Section 2.4, Neighborhood Context, and Section 2.5, Community Relations. Each project description in Section 4.2, Campus Development Plan, contains a narrative on neighborhood context and impacts.

- B. Section 101.5 Maximum FAR: The property within the Central Campus boundary is zoned RF-1, RA-2, RA-5, MU-2, MU-5, PDR-2, and PDR-3. The majority of the core campus area is within RA-2, followed by MU-2 and PDR-3. The future Floor Area Ratio for the entire campus within the boundary is 2.17. The future Floor Area Ratio for all land areas zoned RF-1 and RA-2 is 1.66.

See Tables 1.1-1.2; 3.7; and 4.2 in the Plan.

- C. Section 101.11. Consistency with relevant policies of the Comprehensive Plan: See Section 3.1.2, The D.C. Comprehensive Plan.

17. Compliance with the Conditions of the 2011 Campus Plan (Z.C. No. 11-15) and 2018 Campus Plan Amendment (Z.C. No. 11-15F)

A. Applicable Z.C. No. 11-15 Conditions:

- (1) The University shall not exceed a maximum enrollment of 12,000 students—Complies-see paragraph 7 above.
- (2) Faculty and staff shall not exceed 7,456 (including the Howard University Hospital)—Complies-see paragraph 8 above.
- (3) The University shall continue to work with the Community Advisory Council to clearly address issues to enhance community relations. A senior level University representative will participate in the meetings. --- Complies. The University continues to hold CAC meetings on a quarterly basis. This is further described in section 2.5 Community Relations.
- (4) In the transitioning of existing student residence halls away from use as student housing into faculty and/or workforce housing the University shall not allow the halls to remain vacant for a period of more than one year. --- Complies. Only two (2) residence halls were transitioned from student housing uses but they were extracted from the Campus Plan Boundaries pursuant to Zoning Order 11-15F and subsequently renovated for private (non-university) residential uses.
- (5) In an effort to promote respectful relationships between University students who live in off-campus housing and community residents, the University shall implement the measures set forth in (a)-(e) below. --- Complies. The University's Office of Off-Campus Housing & Community Engagement is responsible for implementing these measures. This Office maintains, updates and communicates off-campus housing policies, inventory, programming and events using a website.
 - (a) No later than December 31, 2012, develop an off campus housing policy that will be published in the student handbook

- (b) No later than December 31, 2012, create an inventory of off campus housing so that students who have off-campus can be readily identified by address
 - (c) Throughout the life of the Campus Plan, regularly convene students who have off campus to orient them to the community's history and heritage, introduce them to community leaders, provide them with tips for safety and adjustment to community having and remind them of off-campus housing policies their rights and responsibilities
 - (d) Throughout the life of the Campus Plan, work with community groups to organize special events where students and neighbors can come together in a pleasant welcoming environment and
 - (e) No later than December 31, 2012, establish a website by that among other things
 - i. Provides valuable information to students and community members such as contact information for University staff MPD DCRA and community leadership in the event issues arise or complaints need to be filed and
 - ii. Contains a complaint form that can be filled out on line by any complainant who needs to alert the University of a concern they may have
- (6) The University shall undertake the following transportation measures:
- (a) Throughout the life of the Campus Plan, coordinate closely with DDOT regarding the roadway design of Georgia Avenue to ensure successful improvement of transit facilities changes to curbside parking and minimization of vehicular delay on the corridor. --- Complies. The University continues to work closely with DDOT on this matter.
 - (b) Prior to the Issuance of a certificate of occupancy for the proposed new student residence halls along 4th Street, and subject to the permission of DDOT install a new traffic signal at the intersection of College and 4th Streets, N.W. --- Complies. This new traffic signal was installed in 2015.
 - (c) No later than December 31, 2015, fund at least one Bikeshare station on the central campus in order to help meet the demand for bicycle transportation and to connect with new activity centers and residential nodes where Bikeshare bicycles and docks have already been installed. --- Complies. A bikeshare station was installed within the campus boundary on Fairmont Street, NW.

- (7) Throughout the life of the Campus Plan, the University shall implement a TDM Plan to encourage students faculty and staff to reduce the number of drive alone trips to the central campus and increase their use of transit and other alternative modes of transportation. The TDM Plan shall include the measures set forth in (a)-(l) below. --- Substantially Complies. The University has been implementing the TDM Plan and has made best efforts to comply, which includes the measures itemized below, in coordination with DDOT.
- (a) Maintenance of bus stops during construction, should any construction activity necessitate bus stop relocation Complies The University has and will continue to work with DDOT to ensure the maintenance of bus stop operations during these circumstances.
 - (b) An increase in the amount of short-term and long-term bicycle parking on campus as described in the TDM Plan submitted to DDOT on November 21 2011 Complies-see section 6(c) above
 - (c) Offering non-University tenants of new campus plan buildings the option to purchase or lease parking spaces at market rate instead of including them in the tenancy lease, thus giving them an opportunity to reduce their use of on-site parking,
 - (d) Posting and publication of the final TDM Plan on the University's Parking and Shuttle webpage and in other University media, where commuter benefits and timelines for implementation will be publicized for all faculty staff and students,
 - (e) Identification of a TDM Leader
 - (f) Installation of at least one transportation information kiosk per year for the first five years of the campus plan implementation
 - (g) Establishment of web links to commuter support websites,
 - (h) Maintenance and Improvement of the University shuttle bus service where necessary
 - (i) Expansion of telecommuting practices and the promotion of flextime schedules where appropriate for faculty and staff
 - (j) An increase in the price of parking on University parking lots by 100% for all permit holders on lots with occupancy levels of 80% or greater beginning in school year 2012-2013,
 - (k) Encourage an increase in the use of WMATA's SmartBenefits program, and

- (1) Conduct annual modal split surveys and monitoring practices to determine the effectiveness of the TDM measures in reducing the percentage of drive-alone University faculty, staff and students. These will include the establishment of aspirational performance indicators and TDM targets (see Finding of Fact No 19 (d) (12)) that the University shall use as benchmarks against which to measure progress, and

B. Applicable Z.C. Order No. 11-15F Conditions (note, conditions with a future deadline are not addressed):

- (1) Condition No. 1 is hereby amended to change the term of the 2011 Plan as follows: The University will submit an application for review of a new campus plan by March 16, 2020. --- Complies with this submission which was filed two weeks later on April 1, 2020 due to complications with production due to the COVID-19 pandemic.
- (2) The University will make best efforts to meet a goal of developing a total of 50-100 housing units at 30%-60% AMI within the Extraction Properties, the Campus Plan boundaries or other Howard University property. --- Complies. The University is currently in negotiations on several development projects, with more in the pipeline. To date, projects under negotiation suggest a total of 51 IZ units (per code). To date, the University has negotiated the option to incrementally add 54 additional affordable housing units (above the IZ requirements).

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- (3) Prior to submitting an application for a building permit to develop an Extraction Property, the University or its development partner(s) will present plans for the development of the property at a public meeting of the ANC within which the property is located. --- Complies. The University

mandates this as a requirement for all development partners of all extraction properties.

- (4) Howard University and community will work together to leverage economic development and tax benefits to reinvest in the community and encourage other city support and investment. --- Complies. The University has and will continue to work with the community and community organizations to leverage economic development and tax benefits in and around the Central Campus.
- (5) The University will make best efforts to work with DDOT to negotiate the terms of easements for public vehicular, bicycle and pedestrian access to the proposed rights of way to be constructed by Howard University and its development partners (“Proposed Right of Way”) areas depicted in Exhibit 33 in the record. The University will record an easement for each Proposed Right of Way prior to applying for any building permits on properties abutting each specific Proposed Right of Way. --- Complies. The University is currently working with DDOT and the Surveyor’s Office to dedicate the extension of W Street across the University’s property. An easement agreement has been executed and DDOT has already reviewed the design documents for the street extension. Additional agreements will be negotiated as other private, rights of way are planned along with future development projects.
- (6) The University will enter into lease agreements with the developer(s) of Slowe and Carver Halls to make available up to 50 parking spaces for the residents of the renovated properties at the University garages located at the northeast and southeast corners of V and 5th Streets, N.W. The agreements will span a period not less than 10 years, subject to an annual renewal clause to allow for demand-based adjustments. --- Complies. This item has been completed.
- (7) The University will report to the Zoning Commission on the status of the Proposed Right of Way easements and Conditions Nos. 2-6 above in all future Campus Plan update, amendment or further processing applications. The Commission shall consider whether the University has made the requisite compliance or best efforts in determining whether to grant all future campus plan requests before it. --- Complies with this document.



Cynthia Giordano