

MEMORANDUM

TO: District of Columbia Zoning Commission
FROM: Crystal Myers, AICP, Project Manager
JLS
Jennifer Steingasser, Deputy Director, Development, Design, and Preservation
DATE: February 24, 2025
SUBJECT: ZC Case 24-17: OP Report for Indiana University Campus Plan

I. SUMMARY RECOMMENDATION

The Indiana University Foundation submitted, pursuant to Subtitle X § 101, a request for special exception review and approval of the new Indiana University Campus Plan (“Campus Plan”). In this Campus Plan the University proposes reusing an existing building at 1619 Massachusetts Avenue, NW as their Washington, DC campus.

The Office of Planning (OP) recommends **approval** of the proposed Campus Plan subject to the conditions:

1. Student Enrollment. The Indiana University student headcount shall not exceed **200** students on a daily basis. Of these students, the number of students who have housing assignments at the Indiana University Washington, DC campus shall not exceed 40 students.
2. The Indiana University Campus Plan shall be valid for a period of 10 years.

II. APPLICATION-IN-BRIEF

Applicant	Indiana University Foundation
Address	1619 Massachusetts Ave. NW
Legal Description	Square 181, Lot 850
Ward and ANC	Ward 2, ANC 2B
Zoning	MU-2/DC
Property Size	11,037 sq.ft.
Existing Development	8-story building, formerly used by John Hopkins University
Proposal	Indiana University intends to renovate and reuse an existing building to establish its new Washington, DC campus. No building expansion is proposed. This campus plan includes student housing for up to 40 students.

III. LOCATION



Site Description and Surrounding Area

The proposed campus plan is for an existing building at 1619 Massachusetts Avenue NW. Previously this building was used by John Hopkins University, and it is currently a part of their campus plan. The building fronts Massachusetts Ave. NW and is bounded by an alley and office building on its western side, an alley in the rear, and embassy buildings on its eastern side.

The surrounding area is made up of embassies, office buildings and some apartment buildings. The location is within walking distance of the Dupont Circle and Farragut North Metro stations.

Historic Significance

This building is also known as the Forest Industries Building (Benjamin T. Rome Building) and was designed by the local firm of Keyes, Lethbridge & Condon in 1961. This building has been widely acknowledged as a notable exception to the unremarkable designs that characterized many 1960s speculative office buildings. Shortly after its completion, it was heralded by the Board of Trade as a “new downtown landmark” and by the Washington Post as a departure from the “cold lifelessness of so many new buildings in our cities.” The building’s carefully considered proportions and deep-set windows distinguished it from other offices buildings at the time, with the original wood window frames (since replaced) providing contrast with the building’s light-colored concrete frame.

This building received a 1961 Office of the Year Award of Merit from Administrative Management magazine, an AIA Potomac Valley Chapter award in 1962, and a Board of Trade architectural award in 1964, and was acknowledged as a potentially eligible historic landmark in

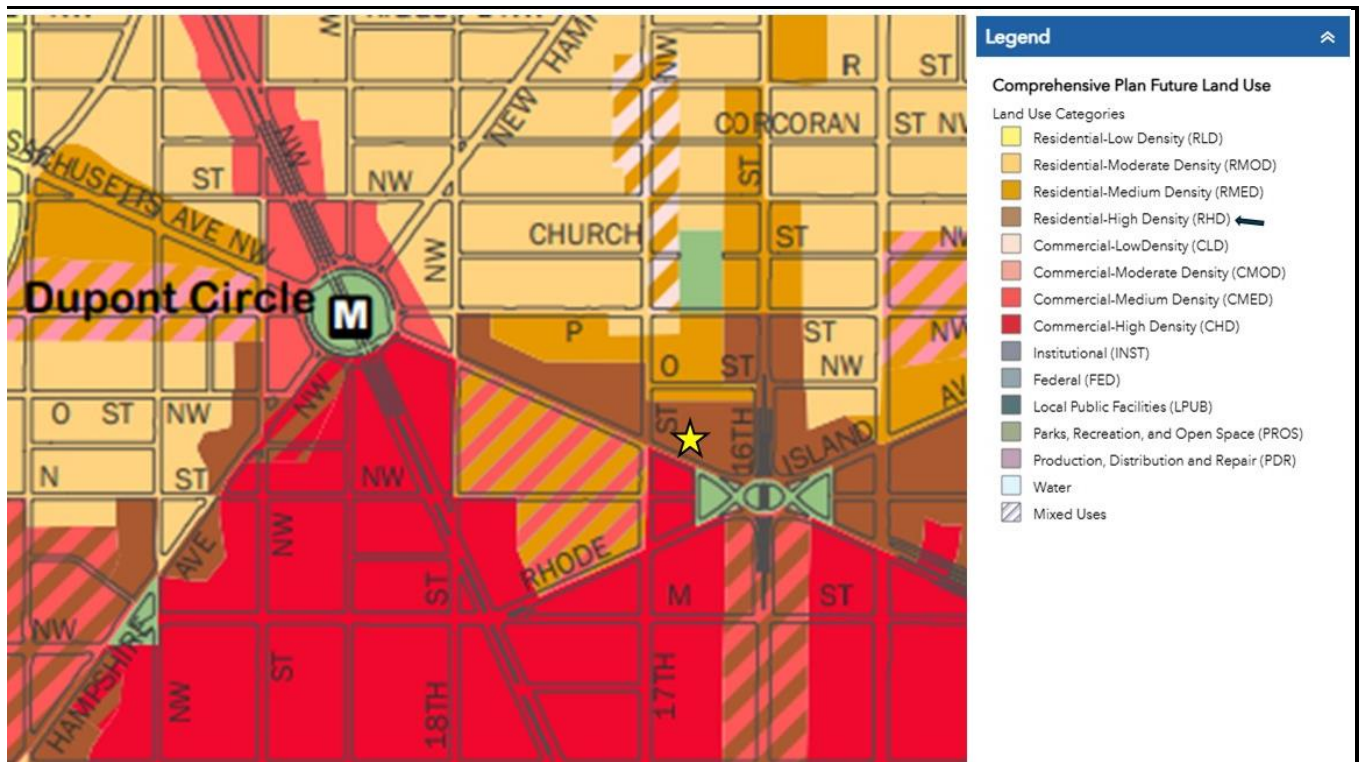
a 2009 survey (“A Context for Modernism in the District of Columbia, 1945-1976) sponsored by the DC Historic Preservation Office.

IV. CAMPUS PLAN PROPOSAL

Indiana University Foundation is proposing to reuse this 8-story building at 1619 Massachusetts Avenue NW to establish a new campus in Washington, DC. They intend to purchase the property from John Hopkins University and renovate it to install academic offices, student housing, and spaces for classes and meetings. The student housing would accommodate up to 40 students and enrollment on campus would be for up to 200 students and 39 faculty and staff.

V. COMPREHENSIVE PLAN MAPS

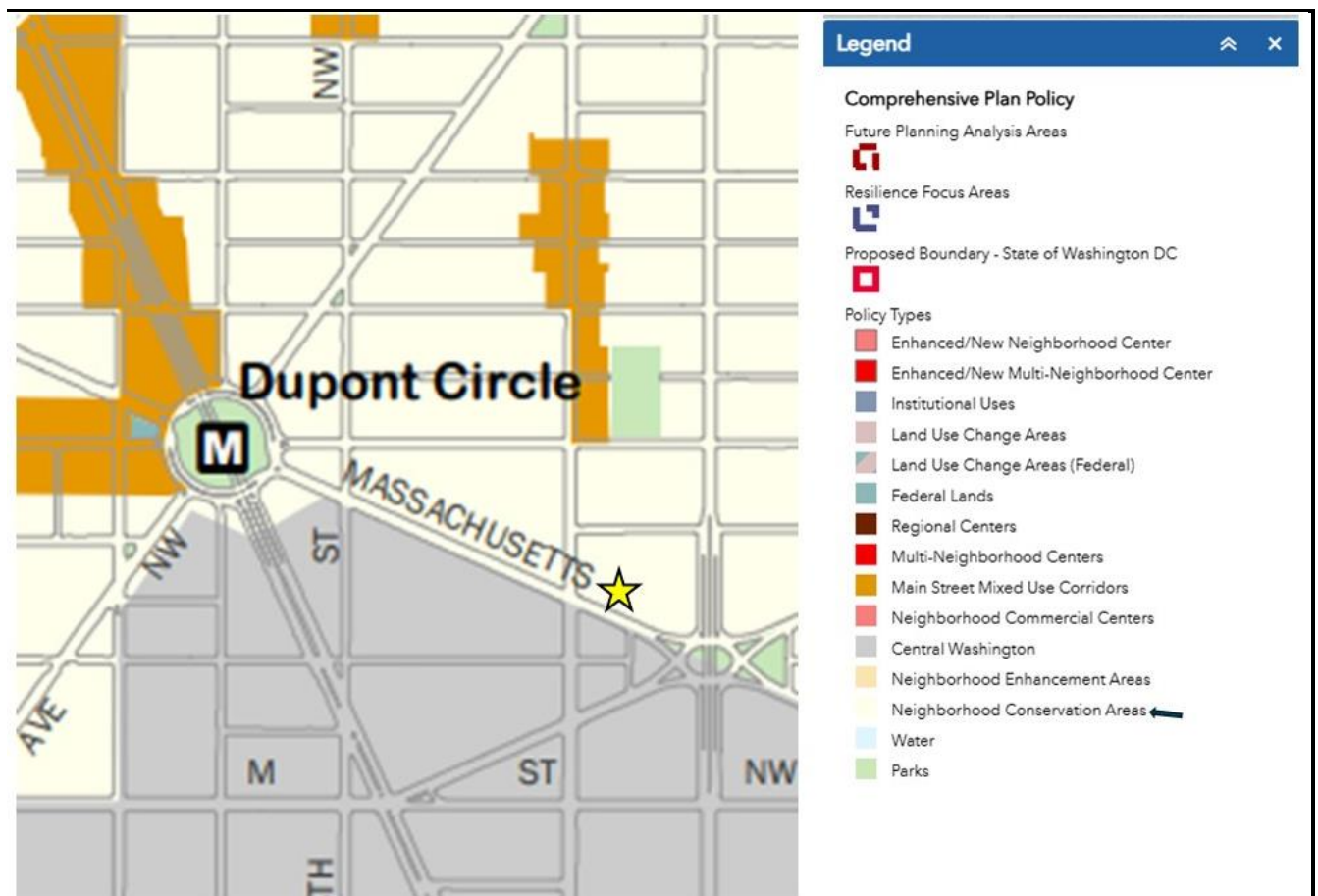
Future Land Use Map



High Density Residential: This designation is used to define neighborhoods and corridors generally, but not exclusively, suited for high-rise apartment buildings. Pockets of less dense housing may exist within these areas. Density is typically greater than a FAR of 4.0, and greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The RA-4 and RA-5 Zone Districts are consistent with the High Density Residential category, and other zones may also apply. 227.8

The campus plan would not be inconsistent with the Comprehensive Plan's Future Land Use Map designation for the site. This campus plan includes student housing. In addition to this, a campus facility within an approved campus plan is considered a compatible use in a residential neighborhood.

Generalize Policy Map



Neighborhood Conservation Areas:...The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods, but not preclude development, particularly to address city-wide housing needs. Limited development and redevelopment opportunities do exist within these areas. The diversity of land uses and building types in these areas should be maintained and new development, redevelopment, and alterations should be compatible with the existing scale, natural features, and character of each area...225

This campus plan would not be inconsistent with the Comprehensive Plan's Generalized Policy Map designation for the site. The building has a recent history as a university facility by John Hopkins' University so Indiana University using it as a university facility would not be out of character for this area.

VI. RACIAL EQUITY ANALYSIS

The Zoning Commission has developed a four-part Racial Equity Toolkit for Applicants and OP to utilize in evaluation of actions brought before the Commission.

The Commission's Racial Equity Tool asks what community is impacted by the zoning action. The subject property is in the Near Northwest (NNW) planning area. In general, this proposal would be consistent with the racial equity goals of the Comprehensive Plan. It would provide housing to its students and by establishing a Washington, DC presence it would allow students interested in federal policy and advocacy the opportunity to participate in its Washington-based programs.

Part 1- Guidance Regarding Comprehensive Plan

Equity is conveyed throughout the Comprehensive Plan, particularly in the context of zoning. The proposal would not be inconsistent with both Comprehensive Plan Generalized Policy Map and Future Land Use Map. On balance this campus plan would not be inconsistent with the Citywide and Near Northwest Area Elements of the Comprehensive Plan. A full Comprehensive Plan discussion is provided in the X 101.11 below in this report. These include the policies that advance racial equity.

Part 2 – Applicant/Petitioner Community Outreach and Engagement

The Applicant presented to ANC 2B and to its Land Use Committee.

Part 3 Disaggregated Data Regarding Race and Ethnicity

Data Trends Over Time

Analysis of census data over time can yield insights into trends in the planning area. The following data compares the 2018-2022 American Community Survey data with data from the 2012-2016 American Community Survey (ACS), available from OP's State Data Center. Each table below covers both 5-year periods and compares the data for the Near Northwest (NNW) planning area, in which the subject site is located, with District-wide data.

Population by Race or Ethnicity

The property is within the Near Northwest Planning area. During both five-year periods most residents in this area were white and the next largest groups were Black and Hispanic residents. Although the Black and white populations represent the majority of the planning area population, both populations went slightly down over the periods while the Hispanic population increased by six percent.

**Population/Race or Ethnicity Districtwide and in the Near Northwest Planning Area
(2012-2016 and 2018-2022)**

Race or Ethnicity	District- wide 2012-16	District- wide Percent	NNW 2012-16	NNW 2012-16 Percent	District- wide 2018-22	District- wide Percent	NNW 2018-22	NNW 2018-22 Percent
Total Population	659,009	100%	78,533	100%	670,587	100%	72,368	100%
White alone	266,035	40.4%	54,618	70%	265,633	39.6%	47,843	66%
Black alone	318,598	48.3%	10,984	14%	297,101	44.3%	9,178	13%
American Indian and Alaskan Native alone	2,174	0.3%	179	0.2%	2,209	0.33%	398	1%
Asian alone	24,036	3.6%	6,400	8%	27,067	4%	6,799	9%
Native Hawaiian and Other Pacific Islander alone	271	0.04%	27	.03%	420	0.06%	89	0.1%
Some other race alone	29,650	4.5%	3,214	4%	30,879	4.6%	2,156	3%
Two or more races	18,245	2.8%	3,111	4%	47,278	7.1%	5,904	8%
Hispanic	69,106	10.5%	9,000	11%	77,168	11.5%	9,552	13%

Median Income

The Near Northwest planning area had a higher median household income than the Districtwide median during both five-year periods. Despite being a high-income area, the Near Northwest planning area's Black and white residents had a lower median income than the Districtwide median income for Black and white residents respectively.

Median Income Districtwide and in the Near Northwest Planning Area

	Districtwide (2012-2016)	NNW (2012-2016)	Districtwide (2018-2022)	NNW (2018-2022)
Median Household Income	\$72,935	\$98,400	\$101,722	\$123,982
White	\$119,564	\$114,423	\$160,745	\$144,677
Black or African American	\$40,560	\$29,645	\$57,076	\$46,611
American Indian and Alaskan Native	\$51,306	N/A	\$60,390	\$66,793
Asian	\$91,453	\$84,378	\$123,660	\$105,730
Some other races	\$41,927	\$51,049	\$61,851	\$72,332
Two or more races	\$83,243	\$99,448	\$108,455	\$110,792
Hispanic or Latino	\$60,848	\$69,094	\$94,203	\$94,315

Higher Education

Over both five-year period the total percentage of residents with Bachelors' degrees in the Near Northwest is considerably higher than the District as a whole. However, as with the District as a whole, the planning area's Black residents are the group with the lowest percentage of Bachelor degree.

Higher Education in the Planning Area and District

Bachelor's Degree or Higher	Districtwide (2012-2016)	NNW (2012-2016)	Districtwide (2018-2022)	NNW (2018-2022)
Total	55.4%	79.4%	62.6%	84.5%
White alone	87.7%	91.3%	91.2%	93.3%
Black or African American alone	24.8%	29.3%	32.3%	37.5%
American Indian and Alaskan Native alone	43.5%	70.5%	38%	6.5%
Asian alone	77.9%	81.9%	85.3%	88.5%
Native Hawaiian and Other Pacific Islander alone	63.7%	100%	70.6%	61.4%
Some other races	26.2%	36.8%	37.5%	73.4%
Two or more races	67.8%	79.8%	70.3%	87.2%
Hispanic or Latino	42.8%	59.2%	55.7%	79.2%

Part Four: Criteria to Evaluate a Zoning Action through Racial Equity Lens

Factor	Question	OP Response
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	The building is unoccupied so no tenants or residents would be displaced.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	This campus plan does not include commercial uses and its residential units would only be for Indiana University students.
Housing	Will the action result in changes to: <ul style="list-style-type: none"> ▪ Market Rate Housing ▪ Affordable Housing ▪ Replacement Housing 	There will be no changes to market rate or affordable housing. The request would add student housing.
Physical	Will the action result in changes to the physical environment such as:	There will be no changes to the physical environment. This campus plan would adaptively reuse an existing building.

Factor	Question	OP Response
Access to Opportunity	<ul style="list-style-type: none">▪ Job Training/CreationHealthcare▪ Addition of Retail/Access to New Services	This campus plan is expected to directly and indirectly bring new jobs opportunities to the area.
Community	Community Outreach and Engagement.	Indiana University Foundation presented the campus plan to ANC 2B and its Land Use Committee.

Using the Commission’s Racial Equity Tool, the proposed campus plan should not have a negative impact on racial equity in this area. This campus plan would provide employment opportunities to residents and housing to students. The proposed student housing should help to relieve student demand on the District’s housing supply.

VII. CAMPUS PLAN REVIEW

Subtitle X § 101 of the Zoning Regulation outlines the standards for reviewing campus plans and the analysis of the campus plan elements and projects against these criteria are discussed below. Unless specified, the analysis refers to the entire campus and addresses specific impacts of certain project features.

101 CAMPUS PLANS

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.

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 proposal is for a building with a recent history of being used as a university facility so this campus plan proposal should not have a significantly increased impact on the surrounding neighborhood.

Noise and Lighting

The proposal should not result in significant noise or light impacts to any neighboring properties. The school would have policies in place to mitigate potential light and noise impact. Also, the building has inoperable windows, which should help mitigate potential noise impacts. No special events would occur outdoors at this location. Any special event held on-site would occur inside the building.

Traffic and Parking

The proposed campus plan should not impact traffic and parking. The building's existing 23-space parking garage complies with the parking requirement.

Number of Students and Faculty

The proposed maximum number of students and faculty should not be objectionable or have a significant impact on the surround neighborhood. There would be a maximum of 200 students and approximately 39 faculty. Up to 40 of those students would be able to live on campus in the student housing.

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...

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.

There are no commercial uses being proposed.

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

Not Applicable. The property is zoned MU-2/DC

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 campus plan is for the reuse of an existing building. No expansion is proposed.

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 does not include the public street and alley.

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 submitted plans meet this requirement. They can be found at [Exhibit 13](#).

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.

No further processing is requested at this time.

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. Not Applicable. The University is not seeking an interim use.

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.

As noted above, the proposal would not be inconsistent with the Comprehensive Plan's Generalized Policy and Future Land Use Maps. The proposed development, on balance, would also not be inconsistent with the Citywide Elements of the Comprehensive Plan, and would particularly further the policies of the Land Use, Education, Housing, Economic Development, Transportation, and Environmental Protection Elements. It would also further many of the policies in the Near Northwest Area Element.

Below are the Comprehensive Plan policies related to this proposed campus plan:

Land Use Element

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

The proposed Campus Plan would not be inconsistent with the Comprehensive Plan's Land Use Element and not with the above policy, specifically. The proposal is for a campus plan that will occupy an existing building that was formerly used as a university facility. The building is already well-integrated into the neighborhood and surrounded by chancery and embassy uses, which are other institutional uses. Therefore, the proposed campus plan would be compatible with the land uses in this area.

Education Element

Policy EDU-3.3.1: Satellite Campuses: *Promote the development of satellite campuses to accommodate university growth, relieve growth pressure on neighborhoods adjacent to existing campuses, spur economic development and revitalization in underinvested neighborhoods, and create additional lifelong learning opportunities for District residents. 1214.6*

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 proposed Campus Plan would not be inconsistent with the Comprehensive Plan's Education Element, specifically not with the policies above. The proposal is for a satellite campus for Indiana University students participating in the school's Washington, DC programs. This proposal would allow Indiana University to have more of a presence in the city. This would allow them to contribute to the District by partnering with federal agencies, nonprofit organizations, and other institutions.

Housing

Policy H-1.3.5: Student Housing: *Require colleges and universities to address the housing needs of their students and promote the use of such housing by their students. 505.12*

The proposed Campus Plan would not be inconsistent with the Comprehensive Plan's Housing Element, specifically not with the policy above. The proposal includes renovating the 6th and 7th floors of the building to provide student housing for 35-40 students. The school's provision of housing on campus should help prevent the incoming students reducing the housing supply in the area.

Economic Development

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 See also the Educational Facilities Element for additional policies related to colleges and universities.*

Policy ED-2.4.2: Secondary Benefits *Promote the development of local businesses and enterprises that rely on the concentration of universities and health care institutions in the District, including both firms that provide supplies to these industries and firms that benefit from their knowledge and research capacity. 710.5*

The proposed Campus Plan would not be inconsistent with the Comprehensive Plan's Economic Development Element, specifically not with the policies above. This Campus Plan would allow Indiana University to increase its presence in the District, attract talent to the area, and expand its relationships with policy institutions in the area. Through its programs and its partnerships, the school expects to create new academic and employment opportunities in the area.

Transportation Element

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-2.4.1: 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-3.1.1: TDM Programs *Provide, support, and promote programs and strategies aimed at reducing the number of car trips and miles driven (for work and non-work purposes), to increase the efficiency of the transportation system. 415.10*

The proposed Campus Plan would not be inconsistent with the Comprehensive Plan's Transportation Element, specifically the above policies. It proposes using a building that is within

a transit-oriented area near both Dupont Circle and Farragut North Metrorail stations and is along a well-connected sidewalk system.

Environmental Protection Element

Policy E-3.2.1: Carbon Neutrality Support land use policies that move Washington, DC toward achieving District-wide carbon neutrality by 2050. This means that the District will eliminate GHG emissions, or offset any remaining emissions, by supporting initiatives that will reduce emissions, such as tree planting, renewable energy generation, and land conservation. In the short term, the District government will develop a detailed implementation plan with clear milestones in order to achieve carbon neutrality by 2050. 612.3

The proposed Campus Plan would not be inconsistent with the Comprehensive Plan's Environmental Protection Element, specifically not with the above policy. This campus plan proposes to adaptively reuse a former university building. Reusing an existing structure prevents causing carbon emissions related to demolition and construction of a new building.

Near Northwest Area Element

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. Ensure that infill development within these areas is architecturally compatible with its surroundings and positively contributes to the identity and quality of each neighborhood, while providing new housing opportunities, especially affordable housing options. 2108.2

Policy NNW-2.1.2 – Reinforce Existing Development Patterns: Stabilize and maintain existing moderate-density row house areas within the Shaw/Convention Center area. Locate multi-unit buildings in areas already zoned for greater density, including areas near the Mount Vernon Square and Shaw/Howard University Metro stations, and on publicly owned land with the potential for housing. Ensure that development on infill sites scattered throughout the row house portions of the Shaw/Convention Center area is sensitive to and complements the neighborhood's character. 2111.6

The proposed Campus Plan would not be inconsistent with the Comprehensive Plan's Near Northwest Area Element, specifically not with the above policies. The proposed campus plan reuses an existing building in the Dupont Circle Historic District. Reusing this building allows this campus plan to have little if any impact of disturbing the architectural and development character of this historic neighborhood.

VIII. AGENCY COMMENTS

Comments from Department of Environment (DOEE) are attached at Attachment 1

As of the writing of this report, no other agency has submitted comments on this case.

IX. ANC COMMENTS

As of the writing of this report, there are no comments from ANC 2B in the record.

X. COMMUNITY COMMENTS

As of the writing of this report, there are no community comments in the record.

Attachment 1: DOEE Development Review Comments

ZC 24-17: Indiana University Campus Plan

DOEE commends the applicant for reusing an existing building, which can reduce the carbon emissions associated with new construction projects. DOEE encourages the applicant to determine if the LEED certification requirements of the Green Building Act apply to this project. Under the law, a privately-owned substantial improvement project is required to fulfill or exceed the LEED standard at the certification level. Substantial improvement projects are those where the cost of the improvement equals or exceeds 50% of the market value of the structure before the improvement began. DOEE encourages the applicant to explore electrification of the systems in scope and opportunities for deconstruction and reuse. More details about these recommendations are provided below. Please contact doeegreenbuilding@dc.gov with questions.

Energy Performance and Electrification

In line with the District's goal of carbon neutrality and the objectives of the Sustainable DC 2.0 and Clean Energy DC plans to reduce greenhouse gas emissions, DOEE encourages the applicant to design the project to be fully electric (i.e., eliminate the on-site combustion of fossil fuels) or commit to not installing any new fossil fuel systems. This is a low-effort, high-impact opportunity to improve public health and reduce carbon emissions in the District.

DOEE and DOB are evaluating options to include building electrification requirements in future code updates. Building electrification involves powering all building appliances and systems (e.g., domestic hot water, heating equipment, cooking equipment) with electricity rather than fossil fuels (e.g., fossil gas or fuel oil). Efficient electric systems reduce indoor air pollution caused by combustion equipment and can save on operating costs, especially when coupled with solar energy. All-electric buildings can also save on construction costs by avoiding the need to install gas piping. It's easier and more cost-effective for projects to be designed with electric systems than it is to retrofit buildings later, so DOEE strongly encourages projects to evaluate electric options as part of their initial energy modeling exercises. For more information about building electrification in the District, visit this resource page created by the Building Innovation Hub.

Deconstruction, Reuse, and Embodied Carbon Reduction

Given that the applicant will renovate the existing building, DOEE encourages the applicant to explore options for deconstruction and reuse or salvage of materials from the existing above-grade structures. The reuse and rehabilitation of existing buildings can reduce waste and embodied carbon. When reuse is not possible, deconstruction or pre-demolition salvage can divert waste from landfill and incineration and allow for reuse of building materials. Deconstruction is the process of carefully and intentionally dismantling a building rather than demolishing it. While this process is more time consuming than demolition, reusing salvaged materials can reduce construction costs, and the sale of salvaged or recyclable materials can generate additional revenue. Organizations like Community Forklift collect donations of unwanted and salvaged building materials throughout the DC region.