

May 8, 2026

**VIA IZIS**

Mr. Anthony J. Hood, Chairperson  
District of Columbia Zoning Commission  
Office of Zoning  
441 4<sup>th</sup> Street, NW, Suite 200-S  
Washington, DC 20001

Re: **Z.C. Case No. 87-23A: Application of The George Washington University (the “Applicant” or “University”) for a Modification with Hearing of the Approved PUD for 2001 Pennsylvania Avenue NW (Square 78, Lot 853) (the “Property”) – Supplemental Submission**

Dear Chairperson Hood and Members of the Commission:

In accordance with Subtitle Z § 401.5 of the Zoning Regulations, the University hereby submits this supplemental statement in advance of the public hearing to be held on June 8, 2026. The University filed the above-referenced application on September 16, 2025, and seeks to modify the PUD approved in Z.C. Order No. 563 (the “**Approved PUD**”) to (a) allow for university use in the existing building (“**Building**”), and (b) approve new building identification signage for the Building (together, the “**Modified PUD**”). Set forth below are updates related to the plans and community engagement.

**I. Updated Plans**

The University hereby submits updated plans, attached hereto as Exhibit A (the “**Updated Plans**”). The University has revised the east elevation to relocate the building identification sign from the ground floor to the upper stories. The proposed signage is consistent with the south elevation, which includes upper story signage at the same level. As with the south elevation, the sign has been integrated into the building design. A new residential building is under construction across 20<sup>th</sup> Street, and so the University will plan to turn off the lighting for the 20<sup>th</sup> Street signage in the evening after the building is closed.

**II. The Arts Club**

The University has been in communication with the Arts Club and will provide an update regarding its engagement at the public hearing.

### **III. Types of University Uses**

In its setdown report, the Office of Planning (“**OP**”) requested additional information on the anticipated university uses that could be located within the building. In the near term, the University’s initial plan is to move administrative office uses into the building so that they can be co-located in one place, but over time the University may also locate other university uses such as academic programs, research institutes, or student support uses within the building as well.

### **IV. Modifications to Ground-Floor Uses**

The University has met with representatives of ANC 2A and the West End Citizens Association (“**WECA**”) to discuss their concerns regarding the ground-floor retail at the Property. The ANC and WECA have expressed a strong desire to maintain ground floor retail space to serve the Foggy Bottom / West End neighborhoods to the west of the Property, and the University has evaluated ways to balance this desire against the economic realities impacting retail in this building, which is located within and oriented more towards the Golden Triangle business district. As explained in the University’s initial statement, there is over 130,000 square feet of vacant retail within two blocks of the Property, and continued uncertainty, both with respect to downtown commercial real estate and broader macroeconomic forces, creates significant challenges for filling this vacant space.

For these reasons, the University originally planned to convert the entire ground floor to university use. However, in response to the community’s concerns, the University agreed to retain the western retail bay, which is currently occupied with a coffee shop, for retail use. The University continues to seek flexibility to utilize the eastern retail bay, a vacant former bank space, for university use. This space is challenging for a retail tenant, given its long and narrow floorplate and the grade change along 20<sup>th</sup> Street precludes breaking up the space into smaller spaces or adding connections to outdoor café seating along 20<sup>th</sup> Street. Further, the space was minimally built out to accommodate the former bank that occupied the space, and it would require substantial mechanical, electrical, and plumbing buildouts to accommodate other retail uses (including, in particular, food and beverage use, which is the only use with modest interest in the current retail leasing environment). Rather than leaving the space as vacant and waiting for economic conditions to turn around, the University proposes to fill the space with an active student-facing use that will draw university activity north across Pennsylvania Avenue into the downtown business district, consistent with the District’s downtown action plan.

The ANC and WECA have also expressed concern about the reduction in retail space given that retail was part of the original public benefits package for the PUD. As previously noted by the University, retail use in the approved PUD was just one component of a robust public benefits package associated with the original PUD, and the space was actually used for retail use for over three decades. Converting the eastern retail bay to an alternative street-activating use is a reasonable modification that does not materially affect the overall PUD balancing test.

Nonetheless, the University has evaluated a number of potential alternative benefits to replace the eastern retail bay and also further enhance retail in the area. Given the location and constraints of the former bank space, the University believes its best efforts would be to further

activate retail closer to the Foggy Bottom / West End neighborhoods. Therefore, based on recommendations made by neighborhood stakeholders, the University proposes to re-open the retail located within District House for public access to offset the converted ground-floor space in the Modified PUD.

District House is a residence hall that was constructed by the University a decade ago through the interconnection of and addition to three historic former apartment buildings in the 2100 block of H Street and I Street NW. The Commission granted second-stage PUD approval for District House in 2013 (the “**District House PUD**”). As a part of the approval, the University initially provided 5,000 square feet of retail space within District House as publicly accessible retail space to help support the development of I Street retail corridor, which was a key feature of the University’s Campus Plan.<sup>1</sup> However, in 2022, the University modified the District House PUD to limit the retail space to students to support the University’s efforts to strengthen its dining program with healthy, affordable food options in spaces focused on student gathering. While it is still important for District House to operate as a student-focused “third space” for communal gathering, the University will reopen District House for public access during weekday daytime hours and reserving it for students only on nights and weekends.

The reopening of District House’s retail to the public will balance the University’s needs for student-focused space with the neighborhood’s desire for additional retail opportunities. Further, District House will provide the Foggy Bottom / West End neighborhood with immediate retail offerings and in a location that is closer to the residential neighborhoods and co-located with other retail along the I Street retail corridor, rather than rely on market conditions to improve within the further-away and less-ideal space in the Modified PUD. Finally, the proposed swap will allow the University to fill the vacant former bank space with a more street-activating university use that will draw university activity north and help support the remaining (and struggling) retail in the business district.

Given the commitment to both (a) maintain the western retail bay as retail use and (b) provide public access to retail space in District House to offset the conversion of the eastern retail bay to university use, the University is maintaining a retail commitment equal to the original PUD and continues to satisfy the overall balancing test.

#### V. **Proposed Modifications to Conditions of Approved PUD**

To effectuate the Modified PUD and related commitments, the University proposes the following conditions of approval:

1. The University shall be permitted to modify the existing building to implement the Modified PUD as shown on the plans set forth in Exhibit \_ of the Record (“**Modified Plans**”).

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<sup>1</sup> While District House is located along the I Street Retail Corridor, retail use was not required under the First-Stage PUD because the existing buildings were historic structures, and so the District House retail proffer was a voluntary additional commitment.

2. The Modified PUD shall contain a mixture of university, office, and retail uses as permitted in the D-5 Zone District. The Modified PUD shall contain ground-floor retail space as shown on the Modified Plans.
3. The University shall have flexibility from the number and location of short-term bicycle parking spaces, and that the Modified PUD shall provide a minimum of 40 long-term bicycle parking spaces and 36 short-term bicycle parking spaces as shown on the Modified Plans, with flexibility to further adjust the number and location of short-term bicycle parking spaces in response to permitting requirements from public space officials.
4. The Modified PUD shall provide approximately 82 vehicle parking spaces.
5. Within 90 days of the issuance of the final written order and expiration of all applicable appeals periods (or, in the event an appeal is filed, the dismissal of the appeal), the University shall file an application to modify the District House PUD approved in Z.C. Order No. 06-11J/06-12J to restore public access to its retail spaces during weekday daytime hours.

**VI. Transportation Statement**

The University hereby submits the Transportation Statement, prepared by Wells + Associates, regarding the Application, attached hereto as Exhibit B. The resume of Jami Milanovich, the transportation consultant responsible for preparing the Transportation Statement, is at Exhibit 17C of the record.

**VII. Conclusion**

Please do not hesitate to contact David Avitabile at 202-721-1137 or Lee Templin at 202-721-1153 if you have any questions. We greatly appreciate the Commission’s consideration of the application and look forward to presenting the Application at the upcoming public hearing.

Respectfully Submitted,

/s/ David M. Avitabile  
David M. Avitabile

/s/ Lee S. Templin  
Lee S. Templin

## Certificate of Service

I certify that on May 8, 2026, I delivered a copy of the foregoing document and attachments via e-mail or first-class mail to the addresses listed below.

Joel Lawson  
Michael Jurkovic  
D.C. Office of Planning  
[joel.lawson@dc.gov](mailto:joel.lawson@dc.gov)  
[michael.jurkovic@dc.gov](mailto:michael.jurkovic@dc.gov)

Erkin Ozberk  
District Department of Transportation  
[erkin.ozberk1@dc.gov](mailto:erkin.ozberk1@dc.gov)

Advisory Neighborhood Commission 2A  
[2A@anc.dc.gov](mailto:2A@anc.dc.gov)

Jim Malec, SMD 2A08  
[2A08@anc.dc.gov](mailto:2A08@anc.dc.gov)

Advisory Neighborhood Commission 2C  
[2C@anc.dc.gov](mailto:2C@anc.dc.gov)

Arts Club of Washington  
c/o Minturn Wright, Esq.  
Zachary Chapman, Esq.  
Shannon & Wright LLP  
124 S. Royal St.  
Alexandria, VA 22314  
[mwright@shannonwright.law](mailto:mwright@shannonwright.law)  
[zchapman@shannonwright.law](mailto:zchapman@shannonwright.law)

Pepperdine University  
24255 Pacific Coast Hwy  
Malibu, CA 90263-3999  
[lisa.stone@pepperdine.edu](mailto:lisa.stone@pepperdine.edu)

/s/ Lee S. Templin  
Lee S. Templin