

**BEFORE THE ZONING COMMISSION  
FOR THE DISTRICT OF COLUMBIA**

**Howard University 2020-2030 Central Campus Plan  
Further Processing Application**

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**Wonder Plaza Site  
2301 Georgia Avenue, NW  
Square 3064, Lot 44**

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**Statement of the Applicant  
GS Development Services Northeast, LLC**

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November 27, 2024

Respectfully submitted by:

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## **Development Team**

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## Table of Exhibits

Description	Exhibit
<p>Architectural Plans and Elevations for the Fusion Building</p> <p><i>Includes Facilities Plan, Existing and Proposed Conditions, and Neighborhood Context in accordance with Subtitle Z §§ 302.10(c) and (f)</i></p>	A
<p>Copy of Z.C. Order No. 20-08, effective April 8, 2022, approving the Howard University 2020-2030 Central Campus Plan</p>	B
<p>Copy of Z.C. Order No. 20-08A, effective April 29, 2022, approving special exception for interim university use at 300 Bryant St., NW</p>	C
<p>Copy of Z.C. Order No. 20-08B, effective June 9, 2023, approving special exception for interim university use at 1901-1911 5<sup>th</sup> Street, NW</p>	D
<p>Excerpt from the Campus Plan Detailing the Development Program and Massing for the Fusion Building (Campus Plan at pp. 129-130)</p>	E
<p>Evaluation of Consistency with the District Elements of the Comprehensive Plan with Racial Equity Analysis</p> <p><i>Submitted in accordance with Subtitle X § 101.11 and Subtitle Z § 302.10(m)</i></p>	F
<p>Application Form 100</p>	G
<p>Letters of Authorization from Applicant and Property Owner (Howard University)</p>	H
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<p>Names and Addresses of Each Lessee with the Owner for all or part of the Property</p> <p><i>Provided in accordance with Subtitle Z § 302.10(n); two (2) sets of mailing labels delivered to Office of Zoning separately</i></p>	L
<p>Updated 200-Ft. POL (dated October 9, 2024)</p> <p><i>Provided in accordance with Subtitle Z § 302.10(n); two (2) sets of mailing labels delivered to Office of Zoning separately</i></p>	M

## I. INTRODUCTION

GS Development Services Northeast, LLC (the “**Applicant**”), pursuant to authorization from Howard University (“**Howard**”), submits this statement in support (“**Statement**”) of its application to the Zoning Commission for the District of Columbia (the “**Zoning Commission**”) for further processing of the Howard University 2020-2030 Central Campus Plan (the “**Campus Plan**”). This further processing application (the “**Application**”) is filed pursuant to Subtitle X §§ 101 and 106.1, and Subtitle Z § 302 of the District of Columbia Municipal Regulations (“**DCMR**”) (Zoning Regulations of 2016, the “**Zoning Regulations**” and to which all subsequent citations refer unless otherwise specified). The Applicant is also requesting special exception relief from (i) the plaza requirement in the MU-10 zone set forth in Subtitle G § 212.1; and (ii) the short-term bicycle parking requirement for education use (college / university) set forth in Subtitle C § 802.1.

As detailed below, the Applicant proposes to redevelop Howard’s Wonder Plaza site located at 2301 Georgia Avenue, NW (Lot 44 in Square 3064) (the “**Property**”) with a new, state-of-the-art mixed use building that the Campus Plan identifies as the Fusion Building. The project will consist of approximately 315,040 square feet of gross floor area (“**GFA**”) and provide approximately 280 student housing units (592 beds), ground floor retail, a student dining hall and a new, comprehensive wellness center (the “**Project**”). The Project will address critical needs for Howard and revitalize the surrounding area along the Georgia Avenue corridor for years to come.

## II. BACKGROUND

### A. Howard University and Greystar

Established in 1867, Howard is an independent, co-educational institution offering a full array of undergraduate, graduate, and professional programs. Howard is a premier Historically Black College and University (HBCU) that combines elements of liberal arts and science-based undergraduate core curriculum with selected graduate and professional programs. Excellence, leadership, service, and truth are Howard University’s core values. Howard’s aim is to forward the development of scholars and professionals who drive change and engage in scholarship that provides solutions to contemporary global problems—particularly ones impacting the African Diaspora.

Howard’s central campus is a vibrant urban institution located in the northwest quadrant of the District, in Ward 1. The total land area within the campus boundary is approximately 90 acres. Urban residential neighborhoods including Shaw, LeDroit Park, Pleasant Plains, Park View, and Columbia Heights border the central campus, which is home to a majority of the University’s academic and administrative activities. Several historic landmarks, such as Andrew Rankin Memorial Chapel, Frederick Douglass Memorial Hall, and the Founders Library, are also on Howard’s central campus.

For the Project, Howard selected the Applicant as its development partner. The Applicant is an affiliate of Greystar, a leading fully integrated real estate company with years of experience in on- and off- campus housing development and management. Greystar has been setting the pace with transformative developments at several prestigious colleges. The company’s innovative

approach has led to projects that can be tailored to a university's needs and construction that makes buildings more sustainable, energy-saving, and maintainable.

## **B. Howard University 2020-2030 Central Campus Plan**

The Commission approved the Campus Plan pursuant to Zoning Commission (Z.C.) Order No. [20-08](#), effective as of April 8, 2022. *See* Exhibit (“**Ex.**”) B.

The Campus Plan is the product of a broad effort by Howard University to engage a wide range of stakeholders throughout the planning process, including University's Board of Trustees, administration, staff, faculty, and students, as well as neighborhood community stakeholders, several civic associations and task forces, government agencies, and the affected Advisory Neighborhood Commission (“**ANC**”). The Campus Plan's approach is to align the University's existing and future (10-year) programmatic needs with its built environment in support of Howard's Mission, Vision, and Strategic Plan.<sup>1</sup> Six planning principles guide the priorities and objectives set forth in the Campus Plan: (1) support the academic mission; (2) improve the quality of life; (3) advance smart and sustainable urban design; (4) enhance the public realm; (5) enhance physical access and connectivity; and (6) support interdisciplinary academics and research. *See* Campus Plan at p. 6.

The Campus Plan allows a maximum student enrollment of 15,000 students, which includes any student taking at least one class or course. Additional conditions of the Campus Plan relate to community outreach, affordable housing production (within properties extracted from Howard University's previously approved campus plan), regeneration of green space, and transportation management. *See* Z.C. Order No. 20-08 at pp. 7-14. The approved Campus Plan expires on April 8, 2032.

There have been three subsequent zoning approvals since the Campus Plan was approved:

- **Z.C. Order No. 20-08A.** Pursuant to Z.C. Order No. 20-08A, effective as of April 29, 2022, the Zoning Commission approved a special exception for interim university use of a former DC public school building (the Washington Metropolitan School building), specifically for classrooms and associated administrative space. *See* Ex. C.
- **Z.C. Order No. 20-08B.** Pursuant to Z.C. Order No. 20-08B, effective as of June 9, 2023, the Zoning Commission approved a special exception for interim university use of three, three-story former residences (previously used as a day care center) for administrative office space. *See* Ex. D.
- **Z.C. Case No. 20-08C.** At its public meeting held on September 26, 2024, the Zoning Commission approved a Modification of Consequence to expand the boundaries of the Campus Plan to include the Property located at 2711 Georgia Avenue, NW (Lot 53 in Square 3058). The final order is pending issuance.

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<sup>1</sup> Howard University's Mission, Vision & Strategic Plan are outlined on page 30 of the Campus Plan.

### **C. The Fusion Building**

The Campus Plan identifies nine capital projects as being critical for Howard University to achieve its interdisciplinary academic and research priorities and student life goals over the next decade. The focus of these capital projects ranges from student support and services to interdisciplinary academic space to a new Howard University office building.

One such capital project is the new Fusion Building that the Applicant proposes to construct via this Application. The Campus Plan directs that “[t]he new Fusion Building will be developed on the Wonder Plaza site and provide recreation, student life and support functions...and student residences.” *See* Campus Plan at p. 8. “This exciting project will create another new energized campus presence on Georgia Avenue at Bryant Street.” *Id.* The vision for the project is to create “a new epicenter for student engagement and activity, by fusing recreation, residential and retail uses.” *See* Campus Plan at pp. 129-130. To realize this vision, the Campus Plan recommends a 90-foot, 312,000 square foot mixed-use facility including retail, restaurants, recreation, wellness, and student housing. *Id.* Ultimately, the Fusion Building “shifts housing closer to the campus core, which creates better connectivity. Utilizing the eastern edge of Georgia Avenue will lessen impacts to the neighborhood while infusing the corridor with valuable animation and foot traffic.” *Id.* The proposed massing and distribution of uses within the building are detailed in the Campus Plan excerpt attached hereto as Ex. E.

### **D. The Property / Wonder Plaza Site**

The Property—i.e., the Wonder Plaza site, consists of approximately 69,313 square feet of land area. Located along the western boundary of the central campus, the Property is bordered by Georgia Avenue NW to the west, Bryant Street NW to the south, Downing Hall (Howard University College of Engineering and Architecture) to the north, and various university buildings to the east, including the Bunche Center and Howard’s Power Plant. Located just a bit further to the south of the Property, along Georgia Avenue NW, is Howard University’s Interdisciplinary Research building. The LeDroit Park Historic District is also a short walking distance from the Property. A fast food establishment and a large surface parking lot confront the Property to the west, across Georgia Avenue NW.

The surrounding area consists of various institutional and commercial uses. The Property is in a walkable location and is well served by public transit. Both the Shaw-Howard University and the U Street/African-American Civil War Memorial/Cardozo Metrorail stations (Green Line service) are located approximately one half mile from the Property. Stops for Metrobus routes 70, 79, and 92 are within walking distance of the Property. Howard also offers shuttle services for traveling to, from and around the central campus, with stops located near various parking lots, residence halls, and other university-based destinations.

The Property is presently improved with Howard’s Wonder Plaza (iLab) building, which provides digital services and support to the Howard community. Howard also leases some portions of the building to some fast casual restaurant tenants. *See* Ex. L. The building was originally constructed in 1902 for the Corby Baking Company and was expanded with a large addition to house additional baking and distribution facilities in 1911. Baking operations continued on the

Property until 1988, although at that time, the rear portion of the former baking facility was demolished and replaced by a surface parking lot. Howard purchased the Property in 1993. Following Howard's acquisition, the remaining portions of the bakery were renovated for Howard's use and the ground floor fronting Georgia Avenue was heavily altered to accommodate retail and commercial use.

### **E. Z.C. Case No. 24-01 / Petition for Zoning Map Amendment**

As shown on Sheet 2 of the Plans (defined below), the Property is currently zoned Production, Distribution, and Repair-2 (PDR-2). The surrounding area along Georgia Avenue, NW, east of 6<sup>th</sup> Street, NW and south to Bryant Street, NW, shares this zoning. Under a separate application filed with the Commission on January 12, 2024, Howard is seeking approval of a Zoning Map amendment to rezone the Property from the PDR-2 to the Mixed Use (MU)-10 zone. *See* Z.C. Case No. [24-01](#). The petition also seeks to rezone several other properties within Howard's central campus. A public hearing on the petition has been scheduled for December 16, 2024. *See* Public Record for Z.C. Case No. 24-01, Notice of Public Hearing at Ex. [19](#).

The purpose of the MU-10 zone is to permit medium- to high-density mixed-use development with a balance of uses conducive to a higher quality of life and environment for residents, business, employees, and institutions. 11-G DCMR § 101.15(a) (emphasis added). The proposed MU-10 zone and associated development standards will enable the Property to be redeveloped with the Fusion Building, as directed by the Campus Plan.

## **III. THE PROJECT**

### **A. Overview**

As shown on the architectural plans and elevations attached hereto at Ex. A, (the "Plans") the Applicant proposes to redevelop the Property with a mixed use project that is envisioned by the Campus Plan. The Project will consist of approximately 315,040 square feet of GFA, which amounts to a floor area ratio ("FAR") of 4.52, and have a maximum building height of 90 feet. The proposed density is consistent with the density recommended by the Campus Plan and is well within the maximum permitted by the MU-10 zone, should the Zoning Commission approve the map amendment petition discussed in the section above. A zoning summary for the Project that compares the proposed development program against the guidelines of the Campus Plan and the permissions of the MU-10 zone is provided on Sheet 4 of the Plans.

As called for by the Campus Plan, the Project will include a mix of student housing, recreation, and retail uses. A large health and wellness center, complete with weight training areas, two basketball courts, an indoor track, will be programmed within the first two underground levels (B1 and B2) and the ground floor. Additional ground floor space will be allocated for a student dining hall along Georgia Avenue and retail use at the corner of Georgia Avenue and Bryant Street. The upper levels of the Project will include 280 units dedicated to student housing (592 beds) with the following bedroom mix:

- 4-bedroom apartment: 57 units

- 3-bedroom apartment: 15 units
- 2-bedroom apartment: 111 units
- 1-bedroom apartment: 35 units; and
- studio apartment: 62 units

The Project includes the construction of an underground parking garage consisting of approximately 158 parking spaces. The proposed amount of parking is appropriate given the proposed development program and the Property's transit-oriented, accessible location along the Georgia Avenue corridor. Furthermore, the proposed amount of parking will be consistent with the Campus Plan's Transportation Demand Management (TDM) requirement for the University to establish a maximum parking supply of 3,580 spaces (inclusive of the Howard University Hospital). *See* Z.C. Order No. 20-08, Decision No. F.1.d. The Applicant will submit a transportation study to DDOT which demonstrates the Project's compliance with this requirement, which will be filed with the Zoning Commission no less than 30 days prior to the public hearing in accordance with Subtitle Z § 401.8.

The Applicant anticipates that most student-residents of the building will walk to/from University facilities or use alternative means of transportation. Accordingly, the Project will also provide 106 long-term bicycle parking spaces and 32 short-term bicycle parking spaces. Various means of public transit are also readily accessible to residents and visitors of the Project, including two Metrorail stations and stops for three different Metrobus routes. Overall, the Project is designed to discourage automobile dependence and foster a pedestrian-oriented environment. The proposed circulation diagram for the Project is shown on Sheet 11 of the Plans.

The Project's design generally reflects the massing studies and expectations that are outlined in the Campus Plan. *See* Ex. E. Non-residential ground floor uses are intentionally positioned to activate the abutting streetscape and attract interest. Large storefront windows and high ceilings at the ground floor are some techniques used to accentuate the mixed-use character of the Project. The building also integrates two courtyard spaces at the second floor, which are intended to maximize light and air available to residents and facilitate community engagement.

As detailed above in Section II.E, the Property was originally the site of the Corby Baking Company's baking and distribution facilities. The existing buildings is not currently designated as a historic landmark, nor is the Property included within a history district. However, the Applicant acknowledges the building is a notable part of the Georgia Avenue Corridor. Prior to filing the Application, the Applicant met with Historic Preservation Office ("HPO") staff to determine how the Fusion Building could pay homage to the industrial history of the site. As shown in the Plans, the proposed development preserves portions of the existing façade on the north and south ends of the building, as these areas retain the most historic integrity. The middle section of the building, which has already been extensively altered, will be replaced entirely by a new infill building with a massing strategy that echoes the original design. The new infill building will reflect a more modern style of architecture, but its materials and façade rhythm will complement the adjacent facades of historical importance.

Finally, the Project will bring improvements to the abutting streetscape and surrounding environment. The Applicant's proposed landscape plan shows the installation of extensive green

roofs, native plant selections, integrated stormwater management features and other green building measures intended to enhance the Project's sustainability features. Streetscape design will maintain the urban design that supports a highly utilized public sidewalk while providing enhancements to storefronts and entrances. Private-use courtyard spaces will be appropriate for use and support residential and health and wellness activities. *See* Sheet 38 of the Plans.

## **B. Request for Design Flexibility**

Pursuant to Subtitle Z § 702.8, the Applicant is requesting design flexibility for the Project respect to the areas listed below:

- Interior Components: To vary the location and design of all interior components, including partitions, structural slabs, doors, hallways, columns, stairways, atria, and mechanical rooms, provided that the variations do not change the exterior configuration of the building as shown on the plans approved by the order;
- Exterior Materials – Color: To vary the final selection of the colors of the exterior materials based on availability at the time of construction, provided such colors are within the color ranges shown on the plans approved by the order;
- Exterior Details – Location and Dimension: To make minor refinements to the locations and dimensions of exterior details that do not substantially alter the exterior configuration of the building or design shown on the plans approved by the order. Examples of exterior details would include, but are not limited to, doorways, canopies, railings, and skylights;
- Number of Student Housing Units:<sup>2</sup> To provide a range in the approved number of student housing units of plus or minus ten percent (10%), except that the total square footage of the student housing units shall not be reduced.
- Parking Layout: To make refinements to the approved parking configuration, including layout and number of parking space plus or minus ten percent (10%), so long as the number of parking spaces is at least the minimum number of spaces required by the Zoning Regulations;
- Streetscape Design: To vary the location, attributes, and general design of the approved streetscape to comply with the requirements of, and the approval by, the DDOT Public Space Division;
- Signage: To vary the font, message, logo, and color of the approved signage, provided that the maximum overall dimensions and signage materials are consistent with the signage on the plans approved by the order and are compliant with the DC signage regulations; and

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<sup>2</sup> The standard language set forth in Subtitle Z § 702.8(d) has been modified for purposes of the Project.

- Sustainable Features: To vary the approved sustainable features of the project, provided that, if a LEED standard is specified, the total number of LEED points achievable for the project does not decrease below the minimum required for the LEED standard specified by the order.

#### IV. COMPLIANCE WITH CAMPUS PLAN/FURTHER PROCESSING CRITERIA OF SUBTITLE X § 101

Education use by a college or university is permitted as a special exception as part of a campus plan. 11-X DCMR § 101.1. In addition to the campus plan application itself, reviews are required for individual buildings in further processing applications, as is the case here. Generally, the further processing of specific buildings, structures, and uses within an approved campus plan shall be processed as a special exception. 11-X DCMR § 101.9.

Subtitle X § 101 of the Zoning Regulations sets forth the criteria for reviewing a campus plan/further processing application. This Application complies with all the provisions under Subtitle X § 101 **that are relevant to the Application**, as discussed below:

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

The Property is subject to the approved Campus Plan for Howard University, which expires on April 8, 2032. Under that approval, the Commission concluded that the Applicant satisfied all standards set forth in Subtitle X § 101. *See* Z.C. Order No. 20-08, Conclusion of Law No. 2. This Application proposes the redevelopment of the Property with a mixed use building consisting of residential, recreation, and retail uses, as envisioned by the Campus Plan. As discussed further below, the Project is in harmony with the purpose and intent of the Campus Plan and the MU-10 zone, and its construction will not tend to affect adversely the use of neighboring property. *See* Subtitle X § 101.9.

- **Subtitle X § 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 Fusion Building is not likely to become objectionable to neighboring property because of noise, traffic, parking, number of students, or other objectionable conditions. In accordance with the direction of the Campus Plan, the Project is squarely intended to create a new “epicenter” for student activity and engagement by “fusing” student housing, a large fitness center, and retail space at a transit-oriented location on the western edge of the University’s central campus. The Project will generate 280 student housing units, bringing new student housing closer to the campus core and lessening impacts to the surrounding neighborhood. The Project also provides 158 parking spaces in a below-grade garage, thus encouraging alternative means of

transportation and minimizing impacts to the surrounding traffic network. Furthermore, the design of the proposed building, complete with open courtyards and inviting spaces at the pedestrian level, will encourage high levels of activity and engagement on-site, which is appropriate given the Property's location along the Georgia Avenue corridor.

- **Subtitle X § 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 Project would not create general commercial activities that are unrelated to the educational mission of Howard, as the Applicant's proposal aligns with the Campus Plan's vision for the Property. As detailed in the Applicant's Comprehensive Plan Evaluation submitted herewith, this Application is also not inconsistent with the Comprehensive Plan. *See Ex. F.*

- **Subtitle X § 101.6.** *Because of the 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 Fusion Building is not and would not be located in a low-density zone (e.g., R, RF, or RA zone). Should the Zoning Commission approve the map amendment petition being requested in Z.C. Case No. 24-01, the Property would be zoned MU-10. It is worth noting that the Property is located on the western boundary of the University's central campus along Georgia Avenue; and the Project is intended to revitalize a "vibrant campus gateway" location (*see* Campus Plan at p. 129); it is not a precursor to any westward expansion. Thus, there is no risk of unreasonable campus expansion as a result of the Project.

- **Subtitle X § 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 for the Project is based only on the Property's land area. The adjacent public streets were not included in the calculation.

- **Subtitle X § 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.*

This Application is properly filed as a further processing request. The Campus Plan that was approved pursuant to Z.C. Order No. 20-08, and made effective as of April 8, 2022, serves as Howard’s current master plan for developing its campus as a whole over the next decade.

- **Subtitle X § 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. (Emphasis added.)*

In accordance with this provision, the further processing of the Campus Plan to permit the proposed development of the Property must be reviewed as a special exception. Thus, the Commission must find that this Application and the proposed Project are 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 Map. *See* 11-X DCMR §§ 900.1 and 901.2.

The Application and the Project are in harmony with the Zoning Regulations. The intent of regulating campus facilities is to (a) promote well planned designed educational campuses; (b) encourage long-term facilities planning for these uses; (c) minimize negative impacts of campuses on surrounding residential areas; and (d) provide consistency and transparency to the campus planning process. 11-X DCMR § 100.2. The Applicant’s proposal is thus being reviewed in accordance with the appropriate procedures and aligns with the relevant development objectives and design expectations set forth in the Campus Plan. *See* Ex. E. Moreover, if the Zoning Commission ultimately votes to approve the map amendment petition in Z.C. Case No. 24-01, the Project will be in harmony with the new MU-10 zoning for the Property. The Fusion Building will provide “a balance of uses conducive to a higher quality of life” for Howard University students, visitors, and staff, generate activity at the ground level, and help to advance several elements of the Comprehensive Plan, particularly those related to land use and housing. 11-G DCMR § 101.15.

As discussed above and throughout this statement, the Project will not tend to affect adversely the use of neighboring property. The Project is designed to generate an appropriate level of student engagement and activity at a transit-oriented, accessible location along the Georgia Avenue corridor. By providing a substantial amount of student housing, a comprehensive wellness center, and new, ground-floor retail space at accessible locations, the Project supports a variety of student needs, encourages engagement during all hours of the day, and minimizes impacts on surrounding residential areas. Residents and visitors of the Project will also stimulate activity along the Georgia Avenue corridor. Moreover, the proposed amount of vehicle and bicycle

parking, coupled with the proposed improvements to the streetscape, are intended to discourage automobile use and accommodate various means of alternative transportation that are conducive to a collegiate environment.

- **Subtitle X § 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.*

Please refer to Ex. F attached hereto, which is the Applicant's Evaluation of Consistency with the District Elements of the Comprehensive Plan and Racial Equity Analysis (the "**Comp Plan Evaluation**"). The Comp Plan Evaluation assesses the Project's consistency with the relevant policies of the District Elements.

- **Subtitle X § 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 Project consists of approximately 315,040 square feet of GFA, which results in a proposed density of 4.52 FAR. This is consistent with the amount of density approved for the Property under the Campus Plan.

- **Subtitle X § 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.*

Upon acceptance of this further processing application, the Applicant entrusts to the Office of Zoning to refer the application to the Office of Planning ("OP"), the District Department of Transportation ("DDOT"), and the Department of Energy and Environment. The Applicant has previously met with OP regarding this proposal and the companion map amendment petition (Z.C. Case No. 24-01). The Plans (Ex. A) address and incorporate OP's initial feedback.

- **Subtitle X § 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.*

This further processing application is being filed subsequent to the approval of the Campus Plan (*see* Z.C. Order No. 20-08) and does not require an amendment thereto.

## V. COMPLIANCE WITH CAMPUS PLAN/FURTHER PROCESSING FILING REQUIREMENTS

Each application for campus plan/further processing made pursuant to Subtitle X, Chapter 1 shall meet the requirements of Subtitle Z § 302 before it can be accepted by the Office of Zoning for processing. 11-X DCMR § 106.1, 11-Z DCMR § 302.1. This application satisfies all of the filing requirements, including those listed in Subtitle Z § 302.10, as summarized below:

- a) Application Form: Attached as Ex. G is the completed Form 100 – Application Signature Page. Any additional forms that are required will be completed and submitted via IZIS.
- b) Surveyor’s Plat: Attached as Ex. I is the certified surveyor’s plat.
- c) Facilities Plan: This statement and the Plans attached hereto include all details regarding the existing conditions at the Property and the proposed conditions resulting from the Project, including those related to building mass and height, FAR, and building uses. *See* Ex. A.
- d) Student Count: As of Fall 2019, Howard has 9,689 undergraduate, graduate, and professional students. Howard foresees a stable total enrollment with the potential to accommodate approximately 15,000 students. *See* Campus Plan at p. 3. Student enrollment growth is projected based on the assumption that Howard’s STEM program will grow at a rate of 5% per year for the duration of the Campus Plan. *See* Campus Plan at p. 106. The Project will generate new student housing, but will not increase Howard’s student count to an unmanageable or unforeseeable level.
- e) Employee Count: The employee base at Howard is currently comprised of 2,907 individuals (2,533 full-time and 374 part-time), with 1,205 faculty, 1,435 staff, and 267 wage employees. *See* Campus Plan at p. 3.
- f) Neighborhood Context: The neighborhood context is detailed throughout this statement and shown on Sheets 6-9 of the Plans. As discussed throughout this statement, the Property is a well-positioned to accommodate a new and vibrant campus gateway on Georgia Avenue. Located on the western edge of the University’s central campus, at the southeast corner of Georgia Avenue and Bryant Street, the Property is also readily accessible to pedestrians and bicyclists. As directed by the Campus Plan, the Project leverages the Property’s advantageous location to create an “epicenter” of student activity. The proposed development addresses Howard’s needs, is compatible with the mixed-use character of the Georgia Avenue corridor, and minimizes objectionable conditions to the surrounding neighborhood.
- g) Comprehensive Accessibility: A comprehensive transportation report was provided in support of the original campus plan approval. *See* Public Record for Z.C. Case No. 20-08, Ex. 17A1-17A18. In addition, the applicant’s transportation consultant

filed a memorandum that provided guidance for Howard University's implementation of the transportation commitments set forth in the Campus Plan. *See* Ex. 49A. With respect to this further processing request, the Applicant met with DDOT on November 26, 2024, to discuss major transportation considerations for the Project and receive initial feedback on the proposed accessibility and circulation. The Applicant will submit its transportation statement no later than 30 days prior to the public hearing in accordance with Subtitle Z § 401.8.

- h) Conservation: The historical considerations for the Project are detailed above in Section III. The Applicant met with HPO staff to determine an appropriate design for the Project, and one that would pay homage to the former bakery that used to operate at the site—i.e., retention of the existing facades at the north and south ends of the building. In addition, the Applicant is proposing various sustainable building measures to minimize environmental impacts (e.g., extensive green roofs, native plant selection, and integrated stormwater management practices).
- i) Landscape/Open Space: The Applicant's proposed landscape plan is shown on Sheet 38 of the Plans. The Applicant also points to the two courtyards integrated at the second level of the building, which not only serve as open spaces, but will help to maximize the light and air available to student-residents.
- j) Streetscape Treatment: The proposed streetscape treatment is shown with the Applicant's proposed landscape plan (*see* Sheet 38 of the Plans). The proposed streetscape improvements are subject to review and approval by the Public Space Committee.
- k) Campus Programs: Students pursue studies in more than 130 areas within the University's 13 schools and colleges: Arts & Sciences, Business, Communications, Dentistry, Divinity, Education, Engineering & Architecture, Graduate School, Law, Medicine, Nursing & Allied Health Sciences, Pharmacy, and Social Work. The University offers Master's, Doctoral, Professional, Joint Degree, and Undergraduate programs. Howard University is accredited by the Commission on Higher Education of the Middle States Association of Colleges and Schools, and its specialized field programs are accredited by numerous professional accrediting organizations. *See* Campus Plan at p. 3.
- l) DC Public School Student Enrollment: Howard enrolls approximately 20 total DCPS students. The Howard University Dual Enrollment Program provides high-achieving District of Columbia Public School (DCPS) high school juniors and seniors with an opportunity to take college-level courses, earn college credits and begin their college careers prior to enrolling at an institution of higher learning. In the program's inaugural year (2014-2015), nine (9) students from two DCPS high schools (McKinley Tech HS and Benajmin Banneker Academic HS) participated in it. Since then, the program has expanded to include four other high schools (Ballou HS, Duke Ellington School of the Arts, Francis L. Cardozo Education Campus, and Pual Laurence Dunbar HS) and an additional 11 students. Dual

Enrollment students can register as part-time/non-matriculating college students taking up to seven (7) credit hours per semester, but no more than two (2) courses during fall and spring semesters. *See* Campus Plan at p. 7.

- m) Racial Equity Analysis. Attached as Ex. F is the Applicant's Comp Plan Evaluation, which includes a racial equity analysis using the Zoning Commission's current Racial Equity Tool.<sup>3</sup>
- n) Property Owner List: Attached as Ex. J is a list of the owners of all property located within 200 feet of the Property. In accordance with Subtitle Z § 302.10, the Applicant will deliver two (2) sets of mailing labels containing this information required by Subtitle Z § 302.10(n) upon filing this application.
- o) Other Information: All other information regarding the Project is included in this statements, the Plans, and supporting exhibits submitted herewith. The Applicant reserves the right to provide additional information in support of the Application, as needed, in accordance with Subtitle Z § 401.5—i.e., no later than 30 days prior to the public hearing.

## **VI. REQUEST FOR ADDITIONAL SPECIAL EXCEPTIONS**

As discussed above, this application for further processing of the Campus Plan is reviewed as a special exception. 11-X DCMR § 101.9. The Applicant is requesting approval of additional special exceptions from (i) the plaza requirement applicable to the MU-10 zone; and (ii) the minimum number of short-term bicycle parking spaces that are required for the Project.

### **A. Special Exception from the Plaza Requirement in the MU-10 Zone**

Should the Zoning Commission grant the Zoning Map amendment being processed in Z.C. Case No. 24-01, the Property will be rezoned from the PDR-2 zone to the MU-10 zone. In any of the MU-10 zones, a plaza comprising eight percent (8%) of the lot area shall be provided for development on a lot of greater than ten thousand square feet (10,000 sq. ft.), in accordance with the provisions of Subtitle C, Chapter 17. 11-G DCMR § 212.1. Here, the plaza space required by the MU-10 zone is applicable because the Property contains approximately 69,313 square feet of land area.

Plaza regulations are intended to provide spaces in private developments that serve as transitional spaces between streets or pedestrian rights-of-ways and the entrances of buildings. These spaces are intended for public use, and may also be used for temporary commercial displays and other activities, such as café seating. The plaza regulations are intended to ensure that such spaces are appropriately designed, including suitable lighting and landscaping. 11-C DCMR § 1700.1.

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<sup>3</sup> Available at: <https://dcoz.dc.gov/release/zc-racial-equity-analysis-tool-new>.

The requested special exception from the plaza requirement in the MU-10 zone is warranted in this case. As noted above, the plaza regulations are intended to create a seamless interplay between private development and public space. However, the Project integrates multiple residential and non-residential entrances along the abutting streetscape. Such a design, which is consistent with the massing studies in the Campus Plan, reduces the capacity and the need for a central transitional space. Integrating multiple ground-floor entrances also helps to create a more active, urban environment along the Georgia Avenue and Bryant Street corridors. Relief from the plaza requirement is also appropriate in light of the Applicant's efforts to retain the northern and southern facades of the existing building. HPO staff encouraged the Applicant to bridge the new infill structure with the historically relevant portions of the building. The Applicant posits that acknowledging the site's industrial history leaves a greater impact on the Howard community and the surrounding area than would a plaza. Thus, the requested relief from the plaza requirement is in harmony with the Zoning Regulations, is consistent with the Campus Plan, and should not tend to adversely impact neighboring properties.

### **B. Special Exception from Short-Term Bicycle Parking Requirement**

Based on the proposed mix of uses for the Project and corresponding use categories under Subtitle C § 802.1, the Applicant is required to provide a minimum of 158 short-term bicycle parking spaces. However, the site frontages on Georgia Avenue NW and Bryant Street NW do not have the space required to provide the required short-term bicycle parking spaces. The limited space is due to a variety of factors, including the Applicant's efforts to preserve the historically significant facades of the existing building, applicable landscaping requirements, and the locations of existing curb lines. As a result, the Applicant is requesting relief from the short-term bicycle parking requirement. The Applicant proposes to design the streetscape to accommodate as many short-term bicycle parking spaces as possible (32 spaces). To compensate for the lower number of short-term bicycle parking spaces, the Applicant will provide more than the minimum number of required long-term bicycle parking spaces in a ground-level bicycle storage room. The additional long-term spaces will better serve the practical needs of the development, which will primarily accommodate student housing.

## **VII. COMMUNITY ENGAGEMENT**

On March 11, 2024, the Applicant issued a Notice of Intent (NOI) to file the Application in accordance with Subtitle Z §§ 302.6 and 302.7.<sup>4</sup> *See Ex. K.*

The Property is located within the boundaries of ANC 1E-05. Representatives from Howard University met with Commissioner Philip Newland, the Single-Member District representative, on February 22, 2024, to discuss the Application. The Project was also presented to the Howard Office of External Affairs Community Advisory Council (the "**Howard CAC**") on July 13, 2023, and May 22, 2024. The Howard CAC includes Shaw Main Street, Lower Georgia Avenue Main Street, Councilmember's Office, Florida Ave Baptist Church, LeDroit Park Civic Association, Georgia Avenue Thrive, District Bridges, Uniting Our Youth, Pleasant Plains Civic

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<sup>4</sup> The NOI was issued by Greystar Development East, LLC, which is an entity that is affiliated with the Applicant (GS Development Services Northeast, LLC).

Association, HU Alumni-members of the OEA Community Advisory Council, and Howard's Interim Dean Bradford Grant- College of Architecture.

The Applicant will seek the support of ANC 1E prior to the public hearing on the Application.

## **VIII. REQUEST FOR PUBLIC HEARING AND LIST OF WITNESSES**

Pursuant to Subtitle Z § 400.4, applications for further processing of an approved campus plans shall be immediately scheduled for hearing consistent with the notice provisions of Subtitle Z, Chapter 4. Accordingly, the Applicant respectfully requests that the Office of Zoning schedules a public hearing on the Application.

The Applicant's witnesses known at this time are listed below. Witnesses who the Applicant intends to proffer as experts are noted with asterisk (\*). Resumes for the expert witnesses are attached hereto as Ex. J.

- Derrek Niec-Williams, Executive Director of Campus Planning, Architecture & Development, representative of Howard University
- \*Bob Keane / Mickey Finn, WDG Architecture  
*Mr. Keane has been confirmed as an expert witness in architecture and design. Alternatively, the Applicant is proffering Mr. Finn as expert witness in architecture and design.*
- \*Erwin Andres, Gorove-Slade  
*Confirmed expert witness in transportation and traffic management*
- \*Bel St. John Day, Bradley Site Design  
*Applicant as proffer expert witness in landscape architecture*

## **IX. CONCLUSION**

For the reasons set forth above, the Applicant respectfully requests that the Commission approve this Application, which will enable construction of the Project that is identified as the Fusion Building in the 2020-2030 Howard University Central Campus Plan.