

**BEFORE THE DISTRICT OF COLUMBIA
ZONING COMMISSION**

**Center for Hellenic Studies
3100 Whitehaven Street, NW**

Application for University Campus Plan Renewal

PRELIMINARY STATEMENT OF COMPLIANCE WITH BURDEN OF PROOF

I. Introduction

This application (“Application”) for renewal of the University Campus Plan (“Campus Plan”) for the Center for Hellenic Studies (the “Center”) is submitted on behalf of the Trustees for Harvard University (the “Trustees” or the “Applicant”), the owner of property located at 3100 Whitehaven Street, NW (Square 2155, Lot 802) (the “Property”). The Applicant submits this preliminary statement of compliance in support of its Application, pursuant to 11-U DCMR § 203.3 and 11-X DCMR § 101, for a renewal of the Campus Plan and a special exception to allow continued university use at the Property, located in the R-1A District.

The Property has served as the campus for the Center since 1963 and was first approved for university use by the Board of Zoning Adjustment (“BZA”) in 1961 (BZA Appeal No. 6430). The BZA subsequently approved a number of applications involving improvements and additions to the campus (*see* BZA Application Nos. 14659, 15780, and 16213). Review authority for campus plans was later transferred to the Zoning Commission, and the Commission has approved multiple renewals of the Center’s Campus Plan, most recently in 2015, for a period of ten years, until August 17, 2025 (*see* Z.C. Orders No. 04-32 and 15-06).

Through the present Application, the Applicant requests approval for the continued use of the Property as a university campus consistent with the Center’s Campus Plan. The enclosed materials include updated facility planning documents, along with an overview of the Applicant’s priorities for Campus improvements.

II. Background

The Center has long been recognized as a significant contributor to the study of ancient Greek culture, emphasizing the humanistic tradition: (a) through its extensive library holdings numbering in the tens of thousands of titles; (b) by sponsoring colloquia and workshops; (c) by hosting research fellows in the field; and (d) through pioneering digital and collaborative teaching technologies.

The roughly six-acre campus is tucked into the hillside to the north of Dumbarton Oaks Park, an offshoot of the Rock Creek Park system in northwest Washington, DC. The campus is accessed from Whitehaven Street, NW, which is a short dead-end street running northwest from Massachusetts Avenue, NW, and terminating just below Observatory Circle. The Property abuts

the Embassy and Chancery of the Kingdom of Denmark to its west and the Chancery of the Republic of Italy to its east.

In accordance with 11-Z DCMR § 401.5, the Applicant will file its prehearing statement with the Commission no fewer than 30 days prior to the public hearing for the present application. In that statement and at the public hearing, the Applicant will provide additional testimony and evidence to meet its burden of proof to obtain the Commission's approval of the requested special exception. Following herein is a summary statement indicating how the Applicant will meet the burden of proof.

III. Burden of Proof:

Pursuant to 11-U DCMR § 203.3, in the R-Use Groups A, B, and C, “college or university use that is an academic institution of higher learning, including a college or university hospital, dormitory, fraternity, or sorority house proposed to be located on the campus of a college or university, shall be permitted as a special exception if approved by the Zoning Commission subject to the conditions of Subtitle X, Chapter 1 and Subtitle Z” of the Zoning Regulations. The Property is located within the R-1A zoning district, which is classified as Use Group A pursuant to 11-U DCMR § 200.2.

A. Subtitle X Chapter 1:

- 1. Section 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 Center has been located in its current location since 1963. University use of the Property is permitted through special exception, and the BZA and Zoning Commission have found on several occasions that this use is in harmony with the purpose and intent of the Zoning Regulations, and that the location and program of the campus is not likely to become objectionable to adjoining or nearby property owners. The Applicant has reached out to neighboring property owners as well as to Advisory Neighborhood Commission (“ANC”) 2E, the ANC within whose bounds the Property is located, and ANC 3C, the abutting ANC to the Property, and is not aware of any neighbor or community opposition to the continued university use of the Property.

- 2. Section 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.*

As the Zoning Commission and BZA have previously determined, the facilities included in the Campus Plan are located so that they are not likely to become objectionable to neighboring property because of noise, traffic, number of students, or other objectionable conditions. The Center is largely hidden from public view and is accessible to vehicles only from Whitehaven Street, NW, which is a dead-end street accessible only from Massachusetts Avenue, NW. Moreover, the Center's only abutting neighbors are foreign missions, with Italy to the east and Denmark to the west. The Center enjoys good relations with its residential neighbors along Whitehaven Street, NW, and has adequate parking located throughout the campus.

By virtue of the Center's unique mission, it generally attracts as students/fellows mid-career professors of classical studies who reside at the Center during the academic year to conduct research, travel in support of their research, and teach. Approximately 12 fellows are in residence during a typical academic semester, with 5 fellows typically in residence over the summer months. The Center employs only approximately 20 staff, including a mix of full-time and part-time employees.

3. **Section 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 [certain] conditions.*

No commercial uses are located on the campus nor are any commercial uses proposed in the Campus Plan.

4. **Section 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.*

No commercial uses are located on the campus nor are any commercial uses proposed in the Campus Plan.

5. **Section 101.5.** *The maximum height and the maximum total floor area ratio (FAR) of all buildings and structures on the campus shall be 50 feet and 1.8 FAR in the R-zoning districts.*

The campus use of the Property represents a very low density and low intensity of use. The existing building density on the six-acre site is approximately only 0.17 floor area ratio ("FAR") and even should all the proposed improvements proposed in the Campus Plan be constructed, the campus density total would only increase to approximately 0.23 FAR, well below the 1.8 FAR permitted. The buildings on campus also are well below the permitted 50 feet building height.

6. **Section 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.

Not applicable to this Application.

7. **Section 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 Applicant has calculated the 0.17 FAR across the 6-acre site (283,750 sf) including the private drive/road in the calculation.

8. **Section 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.

Included as part of these Application materials is the Campus Plan document addressing the existing and proposed facilities, streets, parking, and loading operations, utilities, landscape considerations and description of existing and proposed activities and use of the campus.

9. **Section 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.*

Not applicable to this Application.

- 10. Section 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.*

No interim use is proposed by the Applicant.

- 11. Section 101.11.** *In reviewing and deciding a campus plan application or new building construction pursuant to a campus plan, the Zoning Commission shall consider, to the extent they are relevant, the policies of the District Elements of the Comprehensive Plan.*

The Campus Plan is consistent with the District's policies set forth in the Comprehensive Plan. The Comprehensive Plan Future Land Use Map shows the Property located in the Residential-Low Density land use category, and the Comprehensive Plan Generalized Policy Map shows the Property located in the Neighborhood Conservation Area category. The Campus Plan is consistent with these designations.

An analysis of the Application's consistency with the Comprehensive Plan, including the requirement of Subtitle Z Section 302.10(m), is included with these Application materials.

- 12. Section 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 Applicant certifies that the existing and proposed improvements located within the campus do not exceed the 1.8 FAR limit for the campus as a whole, as provided in Section 101.5.

- 13. Section 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.*

It is the Applicant's understanding that the Office of Zoning will refer this application to the Office of Planning, the Department of Transportation, and the Department of Energy and Environment. The Applicant will meet with representatives of these departments prior to the public hearing in this matter.

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

The Application is in harmony with the Zoning Regulations and Maps. The Property is zoned R-1A, and university use is permitted in the R-1A zoning district by special exception. The campus has been occupied by the Center for more than 60 years. No change in use is being requested.

The proposed renovations and new construction planned for the campus, as described in the Campus Plan, will not adversely impact neighboring property. The Applicant anticipates a stable enrollment of fellows, a stable or slight increase in number of staff, and only a minimal increase in building density, most of which will occur in the interior or other secluded portions of the campus and thus buffered from neighboring properties.

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

Acknowledged.

- 16. Section 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.*

No further processing of campus buildings is proposed as part of this Application.

IV. Community Outreach

By letter dated February 10, 2025, the Applicant notified the affected ANC's and neighboring property owners of its intent to file the Application for renewal of its Campus Plan, as required pursuant to Subtitle Z § 302.6.

The Applicant made a presentation to the ANC 3C Planning, Zoning, Housing and Economic Development Committee on April 7, 2025, and was requested to present to the full membership of ANC 3C once the Application had been submitted to the Zoning Commission. The Applicant plans to present to ANC 3C on May 19.

The Applicant also provided an informational presentation to ANC 2E at its April 28, 2025, public meeting and plans to return to the ANC at its June 2 public meeting.