

July 15, 2019

VIA IZIS AND HAND DELIVERY

Anthony Hood, Chairman
District of Columbia Zoning Commission
441 4th Street, NW
Suite 200-S
Washington, DC 20001

Re: Z.C. Case No. 06-11Q/06-12Q – Application of the George Washington University (the “University” or “Applicant”) for a Modification to a Campus Plan and First-Stage Planned Unit Development for the Foggy Bottom Campus

Dear Chairman Hood and Members of the Commission:

On behalf of the University, we hereby submit this application to request approval of a Modification of the 2007 Foggy Bottom Campus Plan and related First-Stage Planned Unit Development (“**Campus Plan/PUD**”) approved in the above-referenced case (the “**Order**”). The proposed modifications relate to the conditions of the approved Campus Plan/PUD as a whole, and accordingly the entire Campus is the subject of the modification application (the “**Campus Plan/PUD Modification Application**”). The University plans to renovate Thurston Hall located at 1900 F Street NW, an undergraduate residence hall located on campus that currently provides approximately 1,080 beds for first-year students. In order to effectuate the renovation, the University requests this Modification of Significance for temporary relief from certain Conditions of the Order to address student housing accommodations during the renovation period.

I. Process

Concurrently with this Campus Plan/PUD Modification Application, the University is filing a Modification of Significance application for the Planned Unit Development approved in Commission Order 746-C which relates to 1959 E Street NW (the “**1959 Modification Application**” and together with the Campus Plan/PUD Modification Application the “**Modification Applications**”). The University also intends to file a Further Processing Application for the renovation of Thurston Hall (the “**Further Processing Application**” and together with the Modification Applications, the “**Applications**”). The University requests that the Commission consider the Applications together at a single public hearing so that a complete

overview of the University's plans can be presented in one hearing, and the process for considering the Applications can be streamlined moving forward.

II. Thurston Hall Renovations

The Campus Plan/PUD approved by the Commission in 2007 mandates the provision of a certain number of on-campus beds for the Foggy Bottom full-time undergraduate population. The University also committed to certain measures that would reduce the University's off-campus impacts as a part of the Campus Plan/PUD. To date, the University maintains an on-campus bed supply that exceeds the minimum requirement, and the University has fulfilled all of its commitments regarding off-campus properties.

To support these commitments as well as further the University's own institutional priorities, the Campus Plan/PUD emphasized the importance of creating a vibrant "living and learning community" through outstanding and state-of-the-art facilities. On-campus student housing is therefore a central component of the Campus Plan/PUD both because it allows the University to achieve its on-campus housing commitment and to offset the voluntary reduction in off-campus University-provided undergraduate beds. During the term of the Campus Plan / PUD, the University constructed and delivered both South Hall and District House, providing a net new 817 on-campus beds.¹ The University has also invested approximately \$100 million into existing residence halls to upgrade and renovate these important campus facilities through targeted improvements and enhancements. These new and renovated facilities provide upgraded living configurations, student gathering spaces, and other features that meet updated residential life, accessibility, and quality-of-life standards.

Thurston Hall, located at the intersection of 19th and F Streets NW, currently provides beds for approximately 1,080 first-year students. As the first residence hall for many University students, Thurston is an important component of their first-year student experience. However, Thurston has not been substantially renovated since the University acquired the property in the 1950s, and the building requires a comprehensive renovation to bring it into the 21st century. Therefore, the University is proposing a transformational renovation to enhance the residential experience at Thurston Hall through both a wholesale gut renovation that will reorganize the building's rooms, bathrooms, and common spaces as well as structural changes that will bring additional daylight and enhanced indoor and outdoor student gathering spaces. The Thurston Hall renovations are consistent with the Campus Plan's goals of "providing outstanding and state-of-the-art . . . student activity . . . facilities" and creating a "living and learning community" through housing. These renovations are essential to maintaining Thurston's foundational impact on so many first-year students.

¹ Under the 2000 Campus Plan, the University delivered Potomac House, 1959 E Street, Shenkman Hall, Townhouse Row and 2121 F Street, yielding 1,484 beds.

Renovation and alteration work of the size and scope required for Thurston Hall cannot be accomplished while the residence hall is occupied, nor can it be accomplished during either summer or winter breaks, when less intensive renovation work is often done. Rather, the construction work is anticipated to require closure of the building for up to two academic years (with the closure commencing in summer 2020 and extending as long as summer 2022). The downtime for Thurston Hall will require adjustments to the current housing plan and as such, the University has developed a proposed temporary housing plan to address the temporary loss of Thurston's on-campus beds.

III. Temporary Housing Plan

The University currently provides approximately 200 beds more than what is required under the Campus Plan/PUD conditions², but that surplus is not enough to offset the temporary loss of beds at Thurston Hall. Accordingly, the University's Temporary Housing Plan consists of three primary elements:

- First-year students that would otherwise have been housed in Thurston will be accommodated in other on-campus residence halls, and second-year students will similarly be accommodated in on-campus facilities, which maintains the University's Campus Plan commitment that the university shall require all full-time Foggy Bottom freshmen and sophomore students to reside in housing located within the campus plan boundary. ***This requires flexibility for GW to house second-year students in the residence hall at 1959 E Street, which will require a temporary adjustment to a condition of approval to the 1959 E Street PUD.***
- The re-accommodation of Thurston students in other on-campus residence halls will reduce the number of on-campus beds available to third-year and fourth-year students. Accordingly, the University proposes to use The Aston and One Washington Circle to provide temporary beds for these upperclassmen students. ***The use of The Aston for undergraduate housing requires a temporary adjustment to a condition of approval of the Campus Plan/PUD. In addition, the University will clarify its ability to use One Washington Circle for undergraduate housing.***
- The University's campus plan commitment is to provide beds on-campus for 70% of the first 8,000 Foggy Bottom full-time undergraduates, plus 1 bed for each full-time undergraduate above that amount. With the off-campus beds, the University will continue to provide beds for at least 70% of the Foggy Bottom full-time undergraduate population, and the University will strive to provide 1 bed for each full-time undergraduate over 8,000. However, the University may fall short of its

2 Based on fall 2018 Campus Plan compliance report. The university has additional excess beds available in the spring semester as spring generally has a lower enrollment of full-time undergraduates due to study abroad, early graduation and related items.

commitment to provide 1 bed for each full-time undergraduate over 8,000 (it will only provide beds for 70% rather than 100% of this population) and so it requests temporary relief from this requirement. ***The temporary reduction in the housing requirement as well as use of off-campus beds to satisfy the housing requirement also requires a temporary adjustment to a condition of approval of the Campus Plan/PUD.***

Once the Thurston Hall renovations are complete, the University will discontinue the Temporary Housing Plan and will revert back to the existing housing plan and the current Campus Plan/PUD and 1959 E Street PUD conditions. The renovated Thurston Hall is anticipated to provide approximately 250 net fewer beds, but this reduction is offset by the current bed surplus and the decreased Foggy Bottom full-time undergraduate population.

Additionally, the University is undergoing a separate strategic planning process that includes, among other components, a planned reduction to its undergraduate student population. As a result of these strategic conversations, the University will be voluntarily reducing the size of its incoming undergraduate class in fall 2019 by 100 students, which will reduce the required number of first-year beds. The University is also planning for an equal or greater reduction in fall 2020 and beyond. In addition to meeting the strategic goals of the institution, this reduction will assist the University in reducing the total number of required beds for undergraduate students by virtue of a reduced student population

The chart below summarizes the University’s current and proposed housing under the plan, assuming a two-year renovation period:

	<u>Current</u>	<u>During Renovations</u>		<u>After Renovations</u>
	Fall 2018	Fall 2020	Fall 2021	Fall 2022
Foggy Bottom FT UG Population	9,275	9,075	9,075	9,075
Less additional students studying abroad, additional enrollment reductions, or other		139	139	
Adjusted FB FT UG Population		8,936	8,936	
Required Beds				
Current Condition C6 (70% + 1:1 > 8000)	6,875	6,536	6,536	6,675
Adjusted Condition C6 (70%)		6,353	6,353	
Provided Beds	7,073	6,536	6,536	6,823
On-Campus	7,073	5,993	5,993	6,823
Off-Campus	0	543	543	0

A. First-Year and Second-Year Residence Halls

Thurston Hall, as discussed above, houses approximately 1,080 undergraduates during their first year at the University. Due to the renovations, the University will re-house these first-year students at other on-campus residence halls. Specifically, the University will accommodate first-year students at existing residence halls on campus, either by increasing the number of beds within these residence halls or by converting them to first-year student housing.

As discussed above, the University has separately decided to reduce its Foggy Bottom full-time undergraduate population by approximately 100 students in Fall 2019 and will reduce undergraduate enrollment again in Fall 2020 by at least 100 undergraduate students. This reduces the number of beds that are required both during and after the renovation period.

Some of the residence halls that will be converted to house first-year students currently accommodate second-year students. The University intends to maintain its commitment under the Campus Plan / PUD to house all first and second year students on campus. In order to do so, the University would like to use 1959 E Street for second-year students. 1959 E Street was approved as a PUD in 2002; the PUD includes a condition that does not allow general housing of second-year students. Therefore, the University has filed the 1959 E Modification Application to modify this condition and allow second-year students to be housed in 1959 E Street.

B. Off-Campus Residence Halls

The re-accommodation of first-year and second-year students to other on-campus housing will reduce the amount of on-campus housing for third- and fourth-year students at on-campus residence halls like 1959 E Street. Accordingly, the University proposes to provide beds in two off-campus locations under the University's control.

- First, the University intends to use The Aston for junior and senior students. The Aston, located at 1129 New Hampshire Avenue NW (Square 72, Lot 7), is an existing University residence hall that provides housing for law and graduate students. When configured for juniors and seniors, the residence hall will accommodate approximately 238 beds.
- In addition, the University proposes providing housing for approximately 305 juniors and seniors at One Washington Circle (Square 52, Lot 805). One Washington Circle is a hotel building owned by the University as an investment property, and operated by Modus Hotels. During the two-year temporary housing period, the University will contract with the hotel operator to utilize the hotel rooms for student housing, providing accommodations for approximately 305 students. The property will otherwise continue to function as a hotel, which means the Circle Bistro restaurant will remain open and hotel conference facilities will continue to be available for use.

After the Thurston Hall renovations are complete, the University would discontinue utilizing the Aston and One Washington Circle Hotel to accommodate undergraduate students.

C. Reduction in Housing Requirement

While the University's existing housing surplus, planned enrollment reduction, and proposed 543 off-campus beds at the Aston and One Washington Circle will largely offset the number of beds temporarily removed during the Thurston Hall renovation, the University may not be able to reach the total number of beds required under the current housing condition. Currently under the Campus Plan/PUD, the University must provide housing for 70% of its full-time Foggy Bottom undergraduate population up to 8,000 students plus one bed per full-time Foggy Bottom undergraduate student over 8,000. As part of the Temporary Housing Plan, the University requests a reduction in the required beds to 70% of the total full-time Foggy Bottom undergraduate student population. This number would include the off-campus beds provided at The Aston and One Washington Circle.

This reduction is both temporary, lasting only during the Thurston Hall renovations, and minimal in the overall campus beds requirement. Under the existing Campus Plan/PUD requirements, the University was required in the Fall of 2018 to provide 6,875 beds on campus (70% of 8,000=5,600 beds + 1,275 additional beds).³ Under the Temporary Housing Plan, the University would be required to provide 6,353 beds on campus (70% of 9,075), including the approximately 543 beds at The Aston and One Washington Circle. The University will provide approximately 6,536 beds, which is a difference of approximately 339 beds from the current requirement.

D. Relief from Campus Plan/PUD Conditions

In order to accommodate the Temporary Housing Plan, the University requires relief from the following two conditions and proposes the below temporary conditions:

- **Current Condition P-8(b)**: Effective August 31, 2007, the University shall not house undergraduate students in The Aston (1129 New Hampshire Avenue, N.W.).
- **Temporary Condition 1** (changes shown in bold text): **During the Temporary Housing Plan Effective August 31, 2007**, the University shall not house **undergraduate first- or second-year** students in The Aston (1129 New Hampshire Avenue, N.W.), **but the University may house undergraduate third-year and fourth-year students in the Aston.**

³ In the 2018 Compliance Report, the University noted it was providing 7,073 beds on campus, which is approximately 198 beds over the required number of beds.

- **Current Condition C-6**: For the duration of the Plan, the University shall make available on-campus beds for full-time Foggy Bottom undergraduate students equivalent to 70% of the full-time Foggy Bottom undergraduate student population up to an enrollment of 8,000, plus one bed per full-time Foggy Bottom undergraduate student over 8,000.
- **Temporary Condition 2** (changes shown in bold text): **During the Temporary Housing Plan** ~~For the duration of the Plan~~, the University shall make available **on-campus** beds **either on campus or in The Aston or One Washington Circle** for full-time Foggy Bottom undergraduate students equivalent to 70% of the full-time Foggy Bottom undergraduate student population ~~up to an enrollment of 8,000, plus one bed per full-time Foggy Bottom undergraduate student over 8,000.~~

In addition, for the avoidance of doubt, the University seeks to confirm that the proposed use of One Washington Circle is not inconsistent with Condition P-1 of the Order. Condition P-1 governs the University's ability to acquire and use future investment properties. In general, the University may continue to acquire new investment properties, but the University may not limit its use to the university population or include it as a part of the undergraduate housing program. Condition P-1 is not applicable here, because the hotel was already owned by the University prior to the approval of the 2007 Campus Plan / PUD. Therefore, although Condition P-1 does not apply to the University's proposed use of One Washington Circle, the University desires to amend Condition P-1 to clarify this through the following additional sentence:

- **Temporary Condition 3**: For the avoidance of doubt, the University's use of One Washington Circle for undergraduate housing as a part of the Temporary Housing Plan does not violate Condition P-1 of the Campus Plan / PUD Order.

As detailed above, the University will also request relief from the Condition in the 1959 E Modification Application that limits the 1959 E residence hall to upperclassmen. The relief described above is requested only during the two-year period during which Thurston Hall is anticipated to be renovated (academic year Fall 2020 – Spring 2021, and Fall 2021 – Spring 2022). Beginning in Fall 2022, the above relief will terminate, and the associated conditions will return to effect. If the renovation of Thurston Hall can be completed early, the temporary conditions would cease at the time Thurston Hall reopens.

IV. Consistency with Campus Plan/PUD

A. Standard of Review

The Campus Plan/PUD was approved under the 1958 Zoning Regulations, as amended. The Campus Plan/PUD Modification Application, as set forth in 11-A DCMR §102.4, will be processed under the 2016 Zoning Regulations and evaluated under the 2016 Zoning Regulations

for the requested changes. Generally, modifications of significance to a PUD or Campus Plan shall meet the requirements for approval of a PUD or Campus Plan. 11-Z DCMR § 302.1 (regarding modifications to Campus Plans), §704.3 (regarding modifications to PUDs); *See also*, 11-X DCMR §101 (outlining the evaluation standards for a Campus Plan); §304 (outlining the evaluation standards for a PUD). The review of the modification is “limited to impact of the modification on the subject of the original application.” 11-Z DCMR §704.4. Section 704.4 also notes an intent by the Commission to not “revisit its original decision” in a modification of significance. As set forth below, the Campus Plan/PUD Modification Application satisfies the requirements of the Zoning Regulations for review and approval of a modification of significance to the Campus Plan/PUD.

The evaluation of a modification of significance is generally limited to the impact of the modification on the original Campus Plan/PUD. Here, the modifications are temporary, limited in their extent, and do not materially impact the planning, uses, amenities, benefits, and impacts that formed the basis of the Commission’s prior determination that the Campus Plan/PUD complied with the overall Campus Plan and PUD evaluation standards. In other words, the Campus Plan/PUD Modification Application continues to comply with the evaluation standards as outlined in the Order, including:

- The determination that the Campus Plan avoids the creation of adverse impacts or objectionable conditions;
- The conclusion that the PUD offers commendable number or quality of public benefits whose relatively value is acceptable in light of the degree of development incentives requested; and
- The consistency of the Campus Plan/PUD with the Comprehensive Plan and other adopted policies.

B. Evaluation and Mitigation

As detailed above, the Temporary Housing Plan, including the modifications needed to the existing conditions, do not undermine the overall Campus Plan/PUD and its housing plan.

First, the University will continue to house all first-year and second-year students on campus. This continues to ensure that the younger population of students will be on campus and under greater day-to-day supervision as they transition into independent living. Second, the proposed modifications are temporary and the conditions will be reinstated upon the completion of the Thurston Hall renovations, which is estimated to take up to two years. Third and finally, the mitigations discussed below will limit the potential impacts of the temporary modified conditions on the surrounding community.

GW proposes to implement additional controls to ensure behavior of the third and fourth year students temporarily housed at the Aston and One Washington Circle does not impact the

quality of life of the adjoining communities. The University will intensify its educational efforts on off-campus student life for upperclassmen in the Aston and One Washington Circle and provide Resident Advisors to assist with programming, supervision, and management of the residence hall environments. In addition, the GW police department will be authorized to proactively monitor as well as respond to complaints and incidents at these residence halls. Finally, with respect to One Washington Circle, the University anticipates maintaining on-site hotel management staff 24/7 and restricting access to features such as the balconies and pool. There will be no changes to GW’s parking policies as they relate to undergraduate students.

The following table summarizes the controls will be in place at The Aston and One Washington Circle Hotel for the duration of the Temporary Housing Plan:

	One Washington Circle	The Aston
Students	Approx. 300 Residents (3 rd and 4 th year students)	Approx. 240 Residents (3 rd and 4 th year students)
Staffing & Support in Building	<ul style="list-style-type: none"> Professional Staff (live-in) 5 Resident Advisors 	<ul style="list-style-type: none"> Professional Staff (live-in) 5 Resident Advisors
Safety, Security, and Conduct Oversight	<ul style="list-style-type: none"> 24/7 Front Desk operations with dedicated university administrator contacts for any student issues that arise. Resident Advisors on-Call perform 2 rounds of building nightly and intervene to address any disruptive behaviors. 	<ul style="list-style-type: none"> GWPD Staffed Front Desk Resident Advisors on-Call perform 2 rounds of building nightly and intervene to address any disruptive behaviors.
Communication & Student/Community Meetings	<ul style="list-style-type: none"> Pre-arrival communication with students, parents, and families Required “Being a Good Neighbor” training. Building meetings on move-in day RA meetings with each room to clarify expectations and facilitate roommate agreements Monthly student all- resident meetings to share important updates, and address needs 	<ul style="list-style-type: none"> Pre-arrival communication with students, parents, and families Required “Being a Good Neighbor” training. Building meetings on move-in day RA meetings with each room to clarify expectations and facilitate roommate agreements Monthly student all-resident meetings to share important updates, address needs

Student Activities	<ul style="list-style-type: none"> • After-hours programs and activities to connect students with GW & DC 	<ul style="list-style-type: none"> • After-hours programs and activities to connect students with GW & DC
Policies/ Procedures	<ul style="list-style-type: none"> • Adhere to all hotel policies in addition to university policies & DC/Federal Laws. Includes policies prohibiting alcohol and substances. • GW quiet hours: Sunday – Thursday 10 PM – 7 AM, Friday – Saturday 2 AM – 10 AM. 	<ul style="list-style-type: none"> • Adhere to all university policies & DC/Federal Laws. Includes policies prohibiting alcohol and substances. • GW quiet hours: Sunday – Thursday 10 PM – 7 AM, Friday – Saturday 2 AM – 10 AM.

Therefore, because the Campus Plan/PUD Modification Application is consistent with the originally-approved Campus Plan/PUD, this application meets the evaluation requirements for Commission approval.

V. Exhibits

Included with this application are the following materials:

- Exhibit A Application Form and List of properties in Campus Plan/PUD
- Exhibit B Authorization Letter
- Exhibit C Surveyor’s Plats
- Exhibit D Order
- Exhibit E Zone Map Showing Location of Proposed Housing Sites
- Exhibit F Certification of Notice of Intent
- Exhibit G Property Owner List

Also included are the address labels and a check for \$520, the filing fee for this application.

VI. Conclusion

The University requests that the Commission consider the Campus Plan/PUD Modification Application and the 1959 E Modification Application together and set the modifications down for a public hearing at the earliest possible date. Please feel free to contact Dave at (202) 721-1137 or Meghan at (202) 721-1138 if you have any questions regarding this application.

Sincerely,

David M. Avitabile/is

David M. Avitabile



Meghan Hottel-Cox

Enclosure
DA:mhc

Certificate of Service

The undersigned hereby certifies that copies of the foregoing document will be delivered by first-class mail or hand delivery to the following addresses on July 15, 2019.

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Meghan Hottel-Cox