

GEORGETOWN UNIVERSITY

55 H STREET NW



**APPLICATION TO THE DISTRICT OF COLUMBIA ZONING COMMISSION
ON BEHALF OF GEORGETOWN UNIVERSITY
FOR VOLUNTARY DESIGN REVIEW**

September 27, 2019

I. Introduction

This is the application of Georgetown University (the “**University**”), on behalf of the property owner, President and Directors of Gonzaga College for Zoning Commission review and approval of a an 11-story building containing student housing and related student-serving spaces on H Street NW in Ward 6. The property that is the subject of this application consists of Lot 93 in Square 622 (the “**Property**”). The Property is located on H Street NW between North Capitol Street and 1st Street NW and consists of approximately 33,040 square feet, or 0.76 acres, of land area. The Property is located in the MU-9 Zone District.¹

The University submits this application pursuant to Subtitle X § 601.2 of the District of Columbia Zoning Regulations, which permits an applicant to request Voluntary Design Review by the Zoning Commission. This Application for Voluntary Design Review includes a request pursuant to Subtitle X § 603.1 for flexibility to permit additional height for the proposed project above what is permitted as a matter-of-right in the zone as well as flexibility from the rear yard and side yard requirements. As part of this application, pursuant to Subtitle X § 603.3, the University also requests special exception relief from Subtitle C § 701.5, from the required number of parking spaces for a multiple dwelling unit residential use, pursuant to Subtitle C § 703.2.²

The Property is currently improved with a surface parking lot and the University proposes to rehabilitate the site and develop an 11-story student residence hall with approximately 158 units, containing a total of approximately 476 beds, as well ground floor retail and amenity space (collectively, the “**Project**”). Development of the Project will also include extensive landscaping and programming features for the student community. In addition to the active uses of the courtyards by the building residents, the ground floor of the Project will be designed so that the courtyards are visible throughout the ground floor, enhancing the pedestrian streetscape. Furthermore, the ground floor amenity and retail space will be pedestrian oriented and street activating, encouraging connection and interaction between the Project and the surrounding neighborhood.

¹ Although the DC Zoning Map shows the site split between the MU-9 and the RF-1 zone, this is an error. Z.C. Order No. 909-A clearly indicates that the entire depth of the lot (127 feet) was rezoned to the C-3-C Zone District, which is now the MU-9 Zone District.

² Subtitle X § 603.3 authorizes the Commission to hear and decide any additional requests for special exception relief needed for a project seeking Design Review approval, aside from any design flexibility permitted under Subtitle X § 603.1.

II. Jurisdiction of the Zoning Commission

The Zoning Commission has jurisdiction to grant Voluntary Design Review approval for the proposed development and the requested special exception relief pursuant to Subtitle X §§ 601.2, 603.1, and 603.3 of the Zoning Regulations.

III. Description of Property and Surrounding Area

The Property is a midblock site comprised of approximately 33,040 square feet (0.76 acres) of land area located on the northern side of H Street NW, between North Capitol Street and 1st Street NW. The Property is bounded by an office building to the east, an apartment building to the west, and Gonzaga College High School's athletic fields to the north. The Walmart is located further to the west, at the intersection of 1st Street and H Street NW. To the south of the Property, across H Street, is the Government Printing Office and surface parking associated with that use. The Property is approximately 2 ½ blocks northwest of Union Station. Photographs of the Property and the surrounding area are included in Exhibit E.

IV. Georgetown University's Capitol Campus

Georgetown University has a significant presence in the Downtown East neighborhood. The Property is located approximately 1 ½ blocks northeast of the Georgetown University Law Center (Law Center) campus, which is comprised of three city blocks bounded by Massachusetts Avenue, New Jersey Avenue, E Street, 1st Street, and 2nd Street NW. Georgetown also recently acquired 500 1st Street NW, a commercial office building adjacent to the Law Center campus, which the University intends to use for a mix of academic and administrative purposes. Finally, Georgetown leases space at 640 Massachusetts Avenue NW for its School of Continuing Studies.

The University is developing a number of new academic programs at its downtown Capitol Campus. For example, the University anticipates that a mix of centers and institutes connected to the Law Center and the McCourt School of Public Policy as well as the Medical Center will be located within 500 1st Street, to facilitate collaboration across the University's academic schools and programs. Also located at 500 1st will be an undergraduate program known as the Capitol Applied Learning Lab ("**The CALL**"), which is focused on integrating experiential learning and other opportunities into the undergraduate experience that capitalize on the University's home in the nation's capital.

The CALL is organized around a living and learning environment, central to which is a semester in residence downtown, proximate to internships as well as unique mentorship and networking opportunities. Similarly, the University anticipates continued demand for graduate housing, particularly as Georgetown expands its Law Center, Continuing Studies, and other graduate programs downtown. Therefore, Georgetown acquired a ground lease in the Property in order to develop a student residence hall to support these undergraduate and graduate programs.

V. Project Description

The University proposes to develop the Property with a student residence hall with approximately 158 units, containing a total of approximately 476 beds (“**Project**”).

As shown in the plans and drawings in Exhibit E (“**Plans**”), the Project will be eleven (11) stories in height with a U-shaped configuration. The Property is encumbered by two easements, which inform the basic building orientation and massing. On the west, a 20-foot wide easement area maintains an existing private alley that provides Gonzaga High School with access to its campus from H Street. As a result, the building is set back from the western property line to accommodate this alley, which will also be used to accommodate vehicular access to the Project’s parking and loading spaces. This setback also provides ample light and air to the apartment building to the west. On the east, a 5-foot wide easement provides the adjacent office building with adequate separation to maintain its lot-line window openings. At the Office of Planning’s recommendation, the University designed the Project to extend as far to the east as possible along H Street, in order to maintain a consistent streetwall. Rear portions of the east façade are set back further, to provide additional light and air between the Project and office building.

The ground floor of the Project will include approximately 4,200 square feet of university space, approximately 1,980 square feet of retail space, and building management and support space. Residential units will all be located on the second through eleventh floors. In addition to the residential units, each floor will include a common space and full-size common kitchen. The Project will include a mix of unit types, with approximately 99 four-bedroom units, 2 three-bedroom units, 16 two-bedroom units, 10 one-bedroom units, and 30 studios. The Project will also have a habitable penthouse with student-serving communal recreation spaces, including a fitness center as well as a student lounge.

The primary pedestrian entrance to the Project will be located on H Street. Given the Project’s proximity to the University’s Capitol Campus, the University does not anticipate that the student residents or the employees will have a significant need for on-site parking. Furthermore, the site’s proximity to Union Station and other public transportation, as well as the private university shuttle services serving the nearby law school campus, will help connect the building’s residents to the Hilltop and other destinations. Accordingly, the Project includes only five on-site parking spaces, which will be sufficient to address the parking demand for the building. All loading and deliveries will be also accommodated on the west side of the building from the private alley. The Project will provide a mix of short-term bicycle parking spaces on H Street as well as a room for long-term bike parking within the Project, also accessed from the private alley.

The Project will utilize a variety of high-quality materials to achieve a greater degree of façade articulation for the building. The primary façade along H Street is composed of contemporary metal panel and window system with a terra cotta rain screen wrapping the middle portions of the building to break up the window rhythm and provide additional articulation and visual interest. The lower edge of the rain screen also helps to define the base of the building and aligns with the base of the buildings to the east and west. Similarly, the upper extent of the rain screen aligns with the height of the apartment building to the west, and the Project’s cornice aligns with the lower cornice of the eastern office building. At the ground level, the amount of glazing to provide a sense of pedestrian-oriented double-height windows, which complements the ground-level design of the surrounding buildings. The secondary façade on the side and rear elevations is composed of brick, which harmonizes with the architectural character of surrounding buildings to the west, east, and north.

A significant feature of the Project will be the substantial outdoor amenity spaces for residents, including a large central landscaped courtyard at the rear of the building as well as a secondary courtyard along the east side of the Property. These courtyards are being designed and programmed to accommodate a variety of student-oriented spaces, ranging from teaching areas to social gathering spaces, as well as bioretention areas to support the Project’s sustainability goals. The front of the building will be designed to allow visibility through the building to the rear courtyards, providing views of green space from the front of the building and creating a connected and open street-level atmosphere. The roof of the Project will also incorporate environmentally sustainable design features, including vegetative roof areas and photovoltaic panels. The upper portion of the primary façade is also anticipated to include photovoltaic panels, capitalizing on the south-facing exposure and providing an outward expression of the University’s commitment to sustainable design.

The University has engaged with the city, the community and with Gonzaga High School, its nearby neighbor, regarding the Project. The University presented the Project to ANC 6E at its July 2, 2019 public meeting. The University has also engaged with the Office of Planning (“OP”) and the District Department of Transportation (“DDOT”), leading up to the filing of this application, including meetings with OP in January and July 2019 and with DDOT in August 2019. The University will continue its community engagement efforts as the application and Project move forward.

VI. Zoning Parameters and Flexibility for the Project

Broadly, the Project will be constructed to the floor area ratio (“**FAR**”) limit of 6.5 FAR, but flexibility is requested from the height, rear yard, and side yard requirements to allow for a better design that allows for the creation of significant open spaces and accommodate existing easements on the Property. The additional height and rear yard flexibility allow for a highly-efficient U-shaped design oriented around a larger central rear courtyard than would be achieved

through a matter of right design. Similarly, the side yard flexibility results in a better design than would be possible by right, as a by-right design would either require no side yard (which would violate the easement) or require a minimum 18'4" side yard, which would create too large a gap in the streetscape along H Street.

The Project provides the amount of loading required by the Zoning Regulations, but relief is required from the Project's 51-space parking requirement. As a student residence hall located in a transit-oriented downtown location blocks from the classrooms and employment centers for the student residents, vehicle parking is unnecessary. As designed, the Project will provide five parking spaces, but these parking spaces are noncompliant from a zoning perspective because they are accessed across and through the loading spaces. Practically speaking, however, these spaces will be accessible except when the loading areas are in active use, and they will serve building occupants that will be aware of the shared use of the parking and loading space. Furthermore, as a fully-furnished residence hall with a small retail space, loading demand will be minimal when compared to a typical multifamily apartment building.

VII. This Application Satisfies the Burden of Proof for Voluntary Design Review Approval

To obtain Voluntary Design Review approval, including flexibility for height and yards pursuant to Subtitle X § 603.1 and special exception approval for a reduction in parking pursuant to Subtitle X § 603.3, the application must satisfy the Voluntary Design Review requirements set forth in Subtitle X §§ 601 & 604. This application satisfies the requirements for such approval, as described in more detail below.

A. The Application Satisfies the Applicability Requirements for Voluntary Design Review in Subtitle X § 601

Pursuant to Subtitle X § 601.3, there is no minimum area required for a Voluntary Design Review application in the MU-9 zone. In addition, under Subtitle X § 601.4, all the property included in a Voluntary Design Review application is required to be contiguous or separated only by a public street, alley, or right-of-way. In this case, the entire Property is a single lot and meets the contiguity requirements.

B. The Application Satisfies the Standards for Design Review in Subtitle X § 604

1. The Proposed Project Will Not Be Inconsistent with the Comprehensive Plan. (11-X DCMR § 604.5)

The purposes of the Comprehensive Plan are to a) define the requirements and aspirations of District residents, and accordingly influence social, economic and physical development; b) guide executive and legislative decisions and matters affecting the District and its citizens; c)

promote economic growth in jobs for District residents; d) guide private and public development in order to achieve District and community goals; e) maintain and enhance the natural and architectural assets of the District; and f) assist in conservation, stabilization and improvement of each neighborhood and community in the District (D.C. Code § 1-245(b)).

The Project advances these purposes by furthering the social and economic development of the District and stabilizing the neighborhood through the construction of a new residential use. The development will also enhance the streetscape and create a pedestrian-friendly experience.

a. Land Use Map

The Future Land Use Map (“**FLUM**”) designates the Property as appropriate for high density commercial uses. The Comprehensive Plan Framework Element defines the high density commercial designation as consisting of “the central employment district of the city and other major office employment centers on the downtown perimeter. It is characterized by office and mixed office/retail buildings greater than eight stories in height, although many lower scale buildings (including historic buildings) are interspersed.” The proposed development, with an overall FAR of [6.45] and height of 110 feet is consistent with this designation. Further, the requested height of 110 feet is within the 130-foot height limit permitted for a PUD in the MU-9 zone, and under Subtitle X § 603.2, the Commission may grant height relief up to the maximum height permitted for a PUD. Therefore, the Project is consistent with the Property’s high density commercial designation in the FLUM.

b. Generalized Policy Map

The Generalized Policy Map designates the Property as a Land Use Change Area. The Framework Element provides that “Land Use Change Areas are areas where change to a different land use from what exists today is anticipated.” Specifically:

“[t]he guiding philosophy in the Land Use Change Areas is to encourage and facilitate new development and promote the adaptive reuse of existing structures. Many of these areas have the capacity to become mixed-use communities containing housing, retail shops, services, workplaces, parks and civic facilities. The Comprehensive Plan’s Area Elements provide additional policies to guide development and redevelopment within the Land Use Change Areas, including the desired mix of uses in each area.”

This Project exemplifies the above-stated goals of the Land Use Change Area designation. It will involve the new development of housing and retail uses, which are elements of the desired land use mix in the NoMA neighborhood (see discussion of Central Washington Area Element, below).

c. Land Use Element

The Project is consistent with a number of policies contained in the Land Use Element and set forth in Exhibit G. The Project will redevelop a vacant site in a targeted area for development of a new central city mixed-use neighborhood with infill development consisting of residential and retail uses. The site is less than three blocks from Union Station and will encourage use of public transportation. Furthermore, the development of the Project by Georgetown University, a major institution in the District, will showcase green and sustainable building methods as well as superior architecture and design. For all of these reasons, the Project furthers the goals of the Land Use Element.

d. Housing Element

The Project will advance multiple housing policies of the Comprehensive Plan, set forth in Exhibit G. The Project will take vacant and underutilized land and will transform the existing condition to provide a mixed-use development of higher density student housing and street-activating amenity and retail uses in the Central Washington area. The Project's design and exterior appearance will respect the design integrity of adjacent properties, by complementing the existing architectural styles, as discussed further below. For these reasons, the Project furthers the Housing Element.

e. Environmental Protection Element

The Project promotes several goals of the Environmental Protection Element of the Comprehensive Plan set forth in Exhibit G. The Project incorporates extensive landscaping that not only will provide aesthetic benefits but will introduce green and permeable space on land that currently features asphalt surface parking. This restoration feature of the Project will extend to residents and visitors by providing a visually pleasing verdant and accessible area for recreation. In addition to a robust landscaping program, the Project will feature a green roof and photovoltaic panels and the Project design will feature an overall environmentally sustainable design. For all these reasons, the Project will further the Environmental Protection Element.

f. Urban Design Element

The Project is consistent with the Urban Design Element, including the policies set forth in Exhibit G. The Project will feature high-quality design and materials and transform a surface parking lot to a lively and dynamic residential development with ground floor retail. The Project will include a building façade that is complementary to the neighboring buildings, as discussed above. Furthermore, the building's piers and terracotta screen will add texture to the façade, and the wide ground floor windows will engage pedestrians on the street level. The Project will replace a vacant property along H Street, one of the District's major corridors, with a well-

designed and visually engaging development. Accordingly, the Project will further the Urban Design Element.

g. Educational Facilities Element

The Project is not inconsistent with the Educational Facilities Element, including the policies set forth in Exhibit G. The Project promotes the development of Georgetown's Capitol Campus, which accommodates the University growth downtown rather than in the lower-density residential neighborhoods near the Hilltop, which is consistent with the University's recent Campus Plans. The Project also provides student housing in a dedicated facility that will reduce student pressure on other housing stock in the District and it addresses the transportation impacts of those students through minimal vehicular parking, ample bicycle parking, and a transit-oriented location. The Project is also consistent with policies that call for university growth to support neighborhood improvement and quality of life, as it will replace a surface parking lot with a well-designed, sustainable building that will fill in the urban fabric and create eyes on the street.

h. Central Washington Area Element

The Project is located in the Central Washington Area and will advance several of the policies of the Central Washington Area Element, set forth in Exhibit G. The Project will introduce an education-focused residential development with ground floor retail into a currently underutilized site in the heart of the Central Washington area. The Project is consistent with the desired NoMA land use mix of residential and ground floor retail uses and will include open space and recreational facilities for residents of the Project. Furthermore, the ground level design of the Project will promote active street life and will feature transparent views into the Project's ground floor, extending through the building to the green space in the rear. The Project will complement the surrounding mix of historic and contemporary architecture, by using a variety of materials to create a varied and dynamic façade. Therefore, the Project will promote the policies of the Central Washington Area Element.

i. Other Comprehensive Plan Policies

In addition to the policies stated above, the Project also advances a number of other policies set forth in the Comprehensive Plan and listed in Exhibit G, including policies in the Transportation Element that call for transit-oriented development and policies in the Parks and Open Space Element that call for common open space in new buildings.

2. **Street frontages are designed to be safe, comfortable, and encourage pedestrian activity, including: (1) Multiple pedestrian entrances for large developments; (2) Direct driveway or garage access to the street is discouraged; (3) Commercial ground floors contain active uses with**

clear, inviting windows; (4) Blank facades are prevented or minimized; and (5) Wide sidewalks are provided. (11-X DCMR § 604.7(a))

The Project has been designed to maximize vehicular and pedestrian connectivity throughout the site. The University proposes its primary pedestrian access points along H Street NW and vehicle access will be through the existing alley along the west side of the building. The Project will include a ground floor retail use as well as wide and clear windows, giving pedestrians an opportunity to interact with and consider the building, rather than just walk past. The University will work with DDOT to address the design for the existing street trees and sidewalk in the public right of way. The Project's ground level design will transform a currently underutilized parcel that creates a gap along H Street, one of the District's major corridors, into an active and open streetscape that will engage the attention and interest of pedestrians.

- 3. Public gathering spaces and open spaces are encouraged, especially in the following situations: (1) Where neighborhood open space is lacking; (2) Near transit stations or hubs; and (3) When they can enhance existing parks and the waterfront. (11-X DCMR § 604.7(b))**

Although not accessible to the broader public, the Project will include substantial green open space in the rear and side ground level courtyards for building residents. The ground floor of the building will be transparent to allow these ground level open and green spaces to be visible throughout the ground floor of the building. In addition to the outdoor green spaces, the Project will include significant common gathering spaces, including amenity space on the ground floor, common areas on each residential floor, and a large common area on the penthouse level. These open spaces will encourage student activity and build a sense of community among the residents of the Project.

- 4. New development respects the historic character of Washington's neighborhoods, including: (1) Developments near the District's major boulevards and public spaces should reinforce the existing urban form; (2) Infill development should respect, though need not imitate, the continuity of neighborhood architectural character; and (3) Development should respect and protect key landscape vistas and axial views of landmarks and important places. (11-X DCMR § 604.7(c))**

As infill development on site is currently improved with only surface parking, the Project will achieve the careful balance of providing housing in a part of the city where residential uses are part of the desired land use mix while doing so in a way that respects the existing character of the surrounding area. As shown on the Plans, the Project will reinforce the existing urban form and will be built out to the street wall. The Project will use the same general materiality,

architectural massing and compatible solid to void architectural composition to the neighboring properties, in order to maintain the continuity of neighborhood architectural character.

- 5. Buildings strive for attractive and inspired façade design, including: (1) Reinforce the pedestrian realm with elevated detailing and design of first (1st) and second (2nd) stories; and (2) Incorporate contextual and quality building materials and fenestration. (11-X DCMR § 604.7(d))**

As shown in the Plans, the Project design incorporates contextual, high-quality, and durable building materials to achieve a greater degree of façade articulation. This mix of building materials will complement the design of neighboring buildings, while adding a modern element to the Project façade. The setback of the windows on the upper levels also adds to the articulation of the building's façade. The Project's ground level will have an especially engaging façade, with large windows drawing in and engaging passing pedestrians, and metal piers between the windows providing texture and depth to the building face.

- 6. Sites are designed with sustainable landscaping. (11-X DCMR § 604.7(e))**

As depicted on the Plans, the Project will include extensive sustainable landscaping to be incorporated throughout the site as a major component of the University's development effort.

- 7. Sites are developed to promote connectivity both internally and with surrounding neighborhoods, including: (1) Pedestrian pathways through developments increase mobility and link neighborhoods to transit; (2) The development incorporates transit and bicycle facilities and amenities; (3) Streets, easements, and open spaces are designed to be safe and pedestrian friendly; (4) Large sites are integrated into the surrounding community through street and pedestrian connections; and (5) Waterfront development contains high quality trail and shoreline design as well as ensuring access and view corridors to the waterfront. (11-X DCMR § 604.7(f))**

As discussed above, the Project is designed to facilitate connectivity through multiple access points. Primary vehicular access will be from the existing alley along the west side of the building. In addition, the site design includes pedestrian entrances along H Street NW and will include approximately 104 long-term bicycle parking spaces and 12 short-term bicycle parking spaces to accommodate residents, staff and visitors who choose to travel by bike. The glass façade on the ground floor will create an open atmosphere for both residents and pedestrians passing by the Project.

C. The Application Satisfies the General Special Exception Requirements

Pursuant to Subtitle X § 604.6, the Zoning Commission must find that the application meets the general special exception requirements of the Zoning Regulations. The application satisfies these requirements as follows.

1. The Proposed Design Is in Harmony with the General Purpose and Intent of the Zoning Regulations and Zoning Maps.

The Project is in harmony with the general purpose and intent of the Zoning Regulations and the Zoning Map. Broadly, the MU-9 Zone District is a high-density zone that permits a broad mix of residential, commercial, and other uses, including multiple dwelling residential buildings and university uses. Aside from the flexibility requested for height, rear yard, and side yard, and the special exception to reduce the vehicle parking, the Project will meet all applicable MU-9 development standards. Most notably, the Project is within the 6.5 FAR limit and, at under 60% lot occupancy, is well below the 100% lot occupancy allowed in the MU-9 Zone District. Indeed, the Project's flexibility from the height requirements is what permits the University to accommodate the Project's density within a relatively low building area, set back the structure from its neighbors to the east and west, and provide ample outdoor courtyards for the building residents.

Similarly, the Project's rear yard and side yard flexibility reflects a design that sites the building appropriately in relation to the surrounding structures. While the Project will not provide the requisite rear yard, a large portion of the rear of the Project consists of large landscaped courtyards, which will provide significant open space and rear yard area. Moreover, the rear of the Property abuts Gonzaga's playing fields, resulting in ample open space behind the Project. The side yards of the Project generally comply with the side yard requirement, except for a small portion of the eastern side yard of the Project, which narrows to 5' where the building fronts on H Street. As discussed above, this allows the Project to maintain a streetwall along H Street to the greatest extent possible and avoid a gap in the urban fabric. Accordingly, the rear yard and side yard flexibility will not tend to adversely affect the use of neighboring property and will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps.

2. The Proposed Building Will Not Affect Adversely the Use of Neighboring Property in Accordance with the Zoning Regulations and Zoning Map.

The Project will maintain the scale and density of the surrounding buildings and will fit appropriately into that context. The University has coordinated with the neighboring Gonzaga High School and has thoughtfully designed the building to minimize any adverse impacts on adjacent properties by preserving ample open space in the rear of the Project, maintaining

setbacks from adjacent buildings to the extent possible, and incorporating high-quality landscape and design features. These features will combine to produce a development that will be an asset to the neighboring community.

VIII. This Application Satisfies the Requirements for Special Exception Relief

The University seeks special exception relief from Subtitle C §701.5, from the required number of parking spaces for a multiple dwelling unit residential use, pursuant to Subtitle C§703.2. An application for a special exception that would otherwise require the approval of the Board of Zoning Adjustment may be heard simultaneously with a design review application, pursuant to Subtitle X §603.3. In order to satisfy the standards for special exception relief for a reduction in number of required parking spaces, the University must demonstrate that it satisfies at least one requirement enumerated in Subtitle X §703.2 and the general special exception requirements discussed below. The University meets these requirements as follows:

- 1. The Board of Zoning Adjustment may grant a full or partial reduction in number of required parking spaces, subject to the general special exception requirements of Subtitle X, and the applicant’s demonstration of at least one (1) of the following:**
 - (b) The use or structure is particularly well served by mass transit, shared vehicle, or bicycle facilities; . . .**
 - (e) The nature of the use or structure or the number of residents, employees, guests, customers, or clients who would reasonably be expected to use the proposed building or structure at one time would generate demand for less parking than the minimum parking standards; (11-C DCMR § 703.2(b, e)).**

The Project is exceptionally well served by mass transit, as it is located less than three blocks from Union Station, the District’s major transportation hub. Furthermore, the Project’s student housing use is not directly equivalent to the traditional multiple dwelling unit residential use, which would require 51 vehicle parking spaces for the 158 units, pursuant to Subtitle C §701.5. Rather, the Project’s proposed student housing use is not anticipated to generate significant demand for parking, as the majority of students do not own vehicles. Therefore, the University believes that a reduction in the required parking spaces is appropriate, given the Project’s primary student housing use.

- 2. The special exception 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. (11-X DCMR §901.2)**

The reduction in parking spaces discourages auto-oriented uses by limiting the number of parking spaces, in furtherance of the Comprehensive Plan. Additionally, limiting the number of parking spaces enables the Project to utilize more area of the ground level site footprint for street activating uses that will enhance the pedestrian experience and further connect the Project to the surrounding neighborhood. The reduction in parking will not have an adverse impact on neighboring properties because parking demand is expected to be low given the proposed use, as discussed above. Nevertheless, the University will implement a robust transportation demand management program to mitigate impacts to the extent there are any, in accordance with Subtitle C §703.4.

IX. Exhibits

The following exhibits are attached to this submission:

Exhibit A: Application Form

Exhibit B: Agent Authorization Letters

Exhibit C: Property Owner List

Exhibit D: Certificate of Notice

Exhibit E: Architectural Plans/Sections/Elevations, and Photographs of the Property

Exhibit F: Surveyor's Plat

Exhibit G: Relevant Comprehensive Plan Provisions

Exhibit H: Zoning Map showing the Property

X. Conclusion

For the foregoing reasons, the University requests that the Commission approve this development per the Voluntary Design Review standards to permit flexibility from the height, rear yard, and side yard requirements and per the special exception standards to approve the reduction in vehicle parking. We look forward to presenting this application to the Commission at the public hearing on this application.

Respectfully,

/s/ _____
David Avitabile

/s/ _____
Jennifer Logan