

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: Modification of Z.C. Order No. 746-C – Application of the George Washington University (the “University” or “Applicant”) for a Modification to a Planned Unit Development for 1959 E Street NW (Square 122, Lot 29) (the “Property”)

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 Planned Unit Development (“**1959 PUD**”) approved in the above-referenced case (the “**Order**”). The proposed modification relates to a condition of the approved 1959 PUD (the “**1959 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 Condition 8 of the Order to allow second-year students to live at the Property during the two-year renovation period for Thurston Hall.

I. Process

Concurrently with this 1959 Modification Application, the University is filing a Modification of Significance application for the 2007 Foggy Bottom Campus Plan and related First-Stage Planned Unit Development (“**Campus Plan/PUD**”) (the “**Campus Plan/PUD Modification Application**”) and together with the 1959 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

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.

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 and Relationship to 1959 PUD

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.

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 the Property for second-year students. However, under the Order, the PUD's Condition 8 does not allow general housing of second-year students. **Therefore, the**

University requests a temporary modification of this condition to allow second-year students to be housed at the Property.

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

- **Current Condition 8:** The University shall restrict residential occupancy in the project to juniors, seniors, graduate students, and students enrolled in an honors program.
- **Temporary Condition 8** (changes shown in **bold** text): The University shall restrict residential occupancy in the project to **sophomores**, juniors, seniors, graduate students, and students enrolled in an honors program.

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 condition will return to effect. If the renovation of Thurston Hall can be completed early, the temporary condition would cease at the time Thurston Hall reopens.

IV. Consistency with 1959 PUD

A. Standard of Review

The 1959 PUD was approved under the 1958 Zoning Regulations, as amended. The 1959 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 shall meet the requirements for approval of a PUD. 11-Z DCMR § 704.3; *See also*, 11-X DCMR §304. 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 1959 PUD Modification Application satisfies the requirements of the Zoning Regulations for review and approval of a modification of significance to the 1959 PUD.

The evaluation of a modification of significance is generally limited to the impact of the modification on the original 1959 PUD. Here, the modification is temporary, limited in its extent, and does not materially impact the planning, uses, amenities, benefits, and impacts that formed the basis of the Commission’s prior determination that the 1959 PUD complied with the overall PUD evaluation standards. In other words, the 1959 Modification Application continues to comply with the evaluation standards as outlined in the Order, including:

- The determination that the 1959 PUD is consistent with the present character of the area;
- The conclusion that the 1959 PUD provides a more attractive and efficient overall planning and design not achievable under matter-of-right development; and
- The consistency of the 1959 PUD with the Comprehensive Plan and other adopted policies.

B. Evaluation

As detailed above, the Temporary Housing Plan, including the modification needed to Condition 8, does not undermine the overall 1959 PUD.

First, the existing Condition 8 allows a variety of students to live at the Property, including juniors, seniors, graduate students, and honors students irrespective of class level. Based on this variety of students, the temporary addition of sophomores to this demographic is highly unlikely to have a discernable impact on the surrounding area.

Additionally, while there will be an addition of some second-year students to the Property where they are not currently housed, this will be accompanied by the loss of approximately 1,000 first-year students in the same block during the Thurston renovation. This change in population will therefore net similar, if not less impactful, results between the existing conditions and the temporary modified condition.

Finally, the revised Condition 8 is temporary and will revert back to the existing condition after the two-year renovation period for Thurston Hall. Therefore, such a limited period of time will not significantly impact the surrounding community or change the conclusions of the 1959 PUD.

Therefore, because the 1959 Modification Application is consistent with the originally-approved 1959 PUD, this application meets the evaluation requirements for Commission approval.

V. Exhibits

Included with this application are the following materials:

<u>Exhibit A</u>	Application Form
<u>Exhibit B</u>	Authorization Letter
<u>Exhibit C</u>	Surveyor's Plats
<u>Exhibit D</u>	Order
<u>Exhibit E</u>	Zone Map Showing Location of Proposed Housing Sites
<u>Exhibit F</u>	Certification of Notice of Intent
<u>Exhibit G</u>	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 1959 Modification Application and the Campus Plan/PUD 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



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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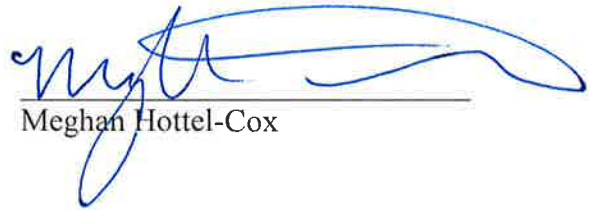
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Meghan Hottel-Cox