

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Jennifer Steingasser, Deputy Director

DATE: November 5, 2012

SUBJECT: Zoning Commission Case Number 06-11G/06-12G, Final Report for The George Washington University Campus Plan Second-Stage PUD in Square 75

I. APPLICATION

The George Washington University (hereinafter “University” or “Applicant”) requests two approvals:

- First, the Applicant requests approval for a second-stage planned unit development (PUD) for Lots 23, 33, 34, 41, 42, and 47 in Square 75 (“Site 75A”). Site 75A was one of sixteen predetermined sites identified in the University’s first-stage PUD, which was approved by the Zoning Commission in Order No. 06-11/06-12 (2007) (hereinafter, “Campus Plan / PUD”).¹ The Campus Plan / PUD also approved Site 75A for a PUD related rezoning from C-3-C to C-4 to accommodate anticipated development.²
- Second, the Applicant requests a modification of the first-stage PUD and related Zoning Map amendment and second-stage PUD approval to incorporate adjacent Lot 863 (hereinafter, “Lot 863”) into the proposed PUD with a related rezoning for Lot 863 from C-3-C to C-4. Lot 863 is also located within the Campus Plan boundaries. The consolidated Site 75A and Lot 863 will hereinafter be referenced as the “Development Site” or “Property.”

The Zoning Commission discussed the application at its regular meeting on July 29, 2012 and set it down for a public hearing.

The Office of Planning (OP) concludes that the proposed project is not inconsistent with the Comprehensive Plan. OP further concludes that should the affordable housing proffer be strengthened by incorporating the Department of Housing and Community Development (DHCD) recommendations and the alley be designed or relocated to appropriately mitigate project impacts on the President Condominium building (hereinafter, “President building”), OP recommends approval.

The Applicant also has advised OP that they are continuing discussions with ANC 2A regarding the sufficiency of the project benefits and amenities package.

II. SITE AND AREA DESCRIPTION

The project would occupy seven University-owned lots. The Development Site includes Lots 23, 33, 34, 41, 42, and 47, collectively referenced as Site 75A, which total 12,350 square feet of land.³ Existing two

¹ See Campus Plan and First-stage PUD and related map amendment (ZC Order No. 06-11/06-12).

² See Campus Plan / PUD, Exhibit O “Proposed Zoning.”

³ The Applicant has indicated that the lot sizes vary slightly from the sizes listed in the Campus Plan / PUD Exhibit B “Tabulation of Development Data”, page 1, based on current property surveys.

to three-story row buildings on Site 75A would be razed as part of the project.⁴ The Development Site also would include Lot 863, which measures approximately 12,650 square feet. Lot 863 is currently improved with an eight-story office building presently occupied by Kaiser Permanente. This existing office building would be razed too. The Property abuts a public alley to the south.

To the west of the Property is the 12-story H.B. Burns Memorial building, which is a historic landmark, at the corner of 22nd Street NW and Pennsylvania Avenue NW, and the adjacent Ambulatory Care Center. Both buildings are operated by a medical affiliate of the University. To the south of the Property, along I Street, is the 90' tall President building which is the single non-University owned property and only residential building within the square.

A series of row buildings generally used for University academic and administrative purposes also line I Street.⁵ To the east of the Property is an eight-story office owned by the University. To the north of the Property, across Pennsylvania Avenue, is a 130' building occupied by a division of the World Bank.

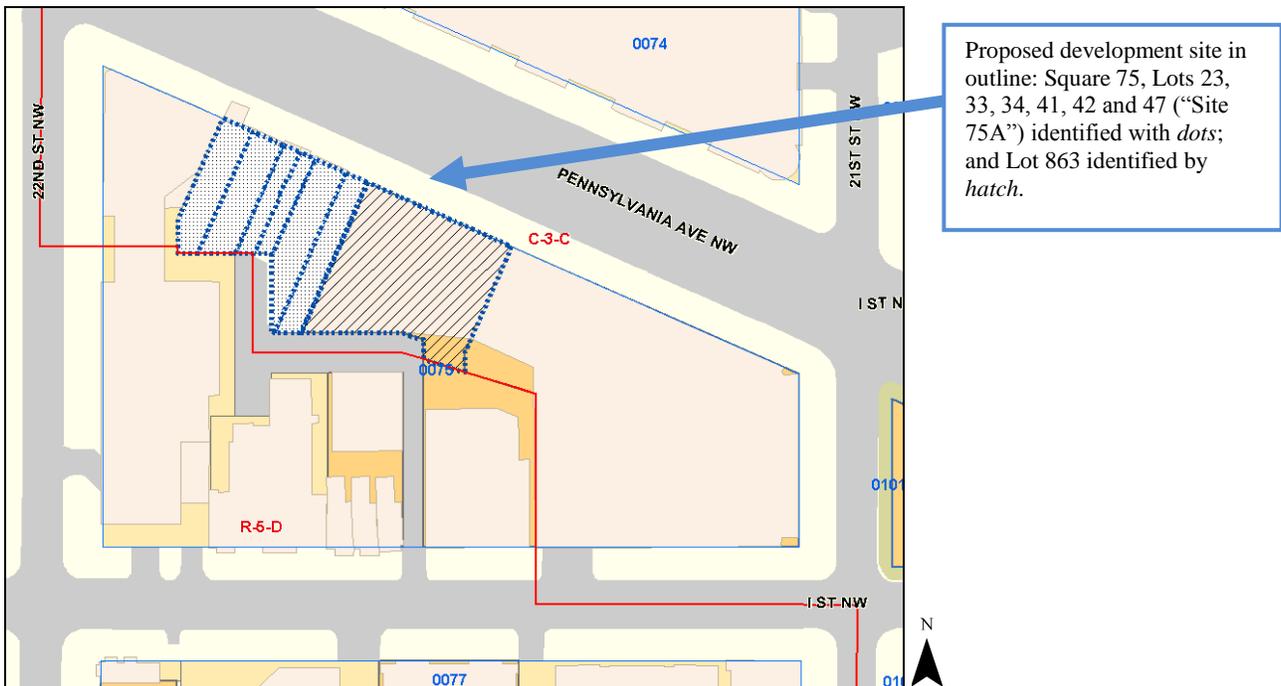


Exhibit 1: View of the site (subject site highlighted)

⁴ The current buildings have not been identified as potential historic landmarks in the approved Campus Plan nor are they located within the boundaries of a proposed campus historic district.

⁵ These University buildings were identified in the Campus Plan as "Site 75B" and calls for their redevelopment into a new building for academic/administrative purposes. See ZC 06-11/06-12 PUD, Exhibit J "Development Program Summary."

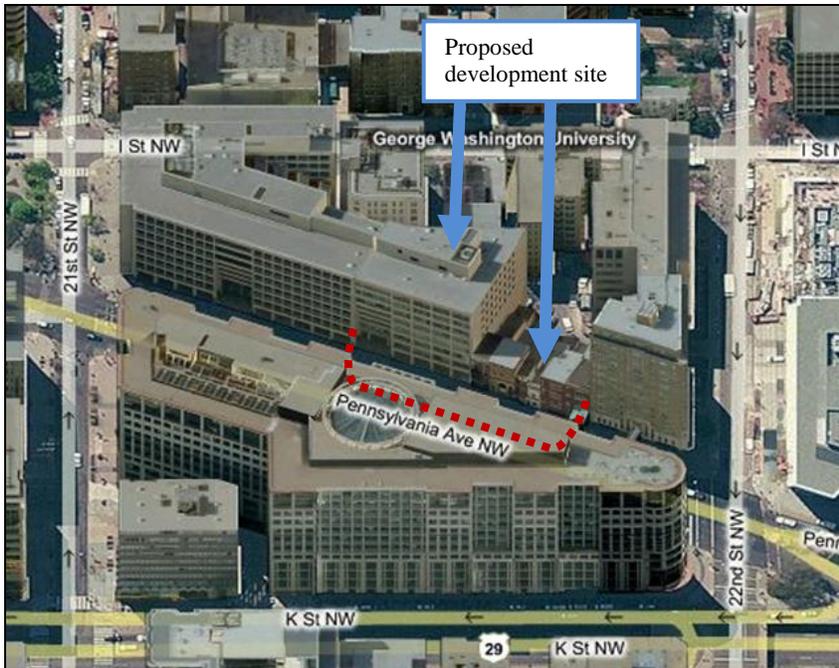


Exhibit 2: View of the site looking south across Pennsylvania Avenue (approximate subject site highlighted)

More generally, the GW Foggy Bottom campus is approximately 43 acres in size and is generally bounded by K Street NW, Washington Circle, and Pennsylvania Avenue to the north, 24th Street NW to the west, F Street NW to the south, and 19th and 20th Streets NW to the east. The campus is proximate to two historic residential neighborhoods, Foggy Bottom to the west, and the West End to the north. Across Pennsylvania Avenue to the northeast is the Golden Triangle business district and to the south are federal buildings and several institutional uses. The Foggy Bottom Metrorail station is located approximately two blocks to the west of the Property. The area also is served by several public bus routes and University shuttle buses.

III. GW FOGGY BOTTOM CAMPUS PLAN

The Campus Plan / PUD, which were approved in 2007, were intended to guide development of the campus until 2027.⁶ Sixteen development sites and related land uses, heights, development densities, circulation paths, parking requirements, and open spaces were recognized. Concerning Site 75A specifically, the Campus Plan / PUD designated the site for commercial / investment or academic / administrative / medical uses. It further anticipated a 130' tall, 10.0 FAR, and 100% lot occupancy development on site 75A.

An underlying goal of the Campus Plan is to “grow up, not out” by concentrating height and density within the central core of the campus and away from adjacent residential areas. The campus as a whole is located within a variety of zones including the R-5-D, R-5-E, C-3-C, and SP-2 zones. The Campus Plan / PUD approval also were accompanied by a PUD-related map amendment for specific sites to facilitate anticipated development.

The PUD Order included many conditions that govern future development of the campus and sets specific requirements for second-stage PUDs. It also identified several public benefits and amenities to be

⁶ See ZC Order No. 06-11/06-12.

provided over the course of the Campus Plan. These included a streetscape plan, commitment to sustainable design principles, historic preservation plan, retail presence along I Street, below grade parking, and limits on new off-campus housing development outside of campus boundaries. Each subsequent second-stage PUD may also present additional public benefits and amenities as appropriate given the impact and types of development proposed.

IV. PROPOSAL

The project would consolidate seven lots and replace existing improvements with a new 11-story office building. The application indicates that the University intends the development as an investment property and not for academic purposes. The building would rise 130' in height, contain 250,000 square feet of gross floor area or 10.0 FAR of density, and would occupy approximately 95% of the lot. OP estimates that the PUD related rezoning of Lot 863 to C-4 would accommodate 44,275 square feet of additional density compared to what the current C-3-C zoning permits as a matter of right.⁷ An existing stairway serving 2100 Pennsylvania Avenue NW to the east, which protrudes into the Development Site, would be rebuilt concurrently with the project. At least 6,637 square feet of ground floor retail and service uses would be provided.

The project would park 179 vehicle spaces (including 35 valet spaces) on three underground levels accessible from the alley.⁸ In association with the project, the alley would be reconfigured and the alley access to I Street would shift to the west.⁹ The alley reconfiguration also would accommodate the consolidation of a series of lots into development Site 75B (as approved in the Campus Plan / PUD) along the Square's south side.¹⁰

V. MODIFICATIONS TO THE PROPOSAL SUBSEQUENT TO SETDOWN

The Applicant has made several changes in response to Commission, OP, other District agencies, and community comments:

- Alley configuration: The Applicant has proposed a change to the portion of the alley which connects to I Street along the President building's east side. The alley connection would be shifted east by 5'6" to allow a separation and planting buffer between the alley and the President building's east property line. The Applicant indicates that the buffer would be landscaped with "low-lying plantings adjacent to the President and evergreen trees along the alley."¹¹ This span of the alley also would be narrowed to 22' in width from the originally proposed 24' width.¹² OP is not aware of the modification's impact to the total alley size, which previously was identified as 8,930 square feet. The Applicant has indicated that discussions regarding mitigation strategies related to the alley design and location are still occurring with the President building. The Applicant also provided a noise study to demonstrate no adverse impacts on the President building based on the reconfigured alley.¹³

⁷ This compares Lot 863 under base C-4 versus base C-3-C.

⁸ The number of parking spaces has been reduced by four spaces since the original proposal.

⁹ The Campus Plan anticipated that the alley connection to I street would be relocated. See Campus Plan / PUD, Exhibit B "Tabulation of Development Data" and Exhibit J "Existing & Proposed Alleys." It appears that at the time of the Campus Plan / PUD, it was anticipated that the relocated alley would have a 15' wide access to I Street rather than the 24' wide access that is proposed.

¹⁰ See Campus Plan / PUD, Exhibit A "Development Sites."

¹¹ Pre-hearing submission dated October 26, 2012, page 7. The Applicant has informally indicated to OP that the Applicant would maintain the landscaping.

¹² The reduction to 22' width apparently was requested by DDOT. See Pre-hearing submission dated October 26, 2012, Exhibit C, page 35.

¹³ Pre-hearing submission dated October 26, 2012, Exhibit B.

- **Affordable housing:** The Applicant has strengthened the housing affordability offering. All seven residential units would be set aside for households earning no more than 80% of the Area Median Income (AMI) for a term of 30 years (an earlier proposal provided a mix of units limited to 80% and 95% AMI). While the Applicant proposes that rents would be based on 35% of household income, exclusive of utilities, DHCD recommends that the Applicant use 30% of the maximum household income to determine maximum rent consistent with the inclusionary zoning standards. More discussion of DHCD recommendations can be found on pages 8-9 of the OP report and attachment Exhibit 6.
- **Retail:** The Applicant has committed to providing at least 6,637 square feet of ground floor retail (approximately 50% of the ground level leasable area) along Pennsylvania Avenue.
- **Trellis:** A trellis on the building's roof has been reduced in size and set further back from the roof edge to make it less visible. The trellis also has been disconnected from the adjacent penthouse.

VII. ZONING ANALYSIS

The proposal proceeds as a second-stage PUD for Site 75A, and a first-stage PUD modification, second-stage PUD, and a related rezoning for Lot 863. Since the Applicant proposes a commercial use of University-owned property in a commercial zone, the application will not be analyzed under § 210.¹⁴ The Office of the Attorney General (OAG) has advised that the proposal also should satisfy the standards of a special exception (§ 3104). The Campus Plan / PUD did set limitations on the bulk and uses for Site 75A, and the proposal is consistent with these terms.¹⁵ The Applicant also requests a PUD related rezoning of Lot 863 from C-3-C to C-4 zoning to create a consolidated C-4 PUD development site.

The table below summarizes certain development standards for the C-3-C, C-4, C-4 PUD zones, as well as a comparison of the approved Site 75A standards and the consolidated proposal (reflecting information provided by the University).

¹⁴ Section 210 applies to college or university uses in residential zones.

¹⁵ See Campus Plan / PUD, Exhibits J "Development Program Summary" and K "Building Heights."

	C-3-C Zoning	C-4	C-4 (PUD)	Approved First-Stage PUD (75A) C-4 with specific limitations	Proposed design (75A + Lot 863)
Maximum Lot Occupancy	100%	100%	100%	100%	95%
Maximum Building Height	90'	130'	130'	130'	130'
Maximum FAR	6.5	10.0	11.0	10.0	10.0
Rear yard	2.5 in/ft of height, not less than 12 ft. Not required for first 20 ft. of height Measured to centerline of rear alley			-	Complies
Courts	Width: 3 in/ft of height, not less than 12 ft. Area: 250 sq. ft.			-	<i>Relief needed</i>
Parking	In excess of 2,000 sq. ft., 1 per 1,800 square feet (141 spaces)			-	Complies: 179 spaces (including 35 valet spaces and 54 compact spaces)
Loading	3 berths @ 30 ft. deep 3 platforms @ 100 sq. ft. each 1 service/delivery space @ 20 ft. deep			-	Complies

Table 1: Zoning analysis of the project

- § 3104 Special Exception Standards

The project would be in harmony with the general purpose and intent of the zoning regulations. Site 75A would be developed consistent with the use, bulk, and height standards provided in the Campus Plan. Lot 863 would gain additional height and density through a related map amendment to accommodate a consolidated project and uniform building size. The Applicant has provided a traffic study, shadow study, and a sound study to demonstrate no adverse impacts on neighboring properties. However, OP recommends that the Applicant design or relocate a portion of the alley in order to appropriately mitigate project impacts on the President building.

VI. FLEXIBILITY

The following relief is required from the Zoning Regulations¹⁶:

- Open Courts

The proposal would create multiple non-conforming courts at the southern portion of the Property adjacent to the relocated public alley. The courts reflect the irregular shape of the Property and the proposal’s attempt to reduce the bulk of the building by setting back the corners of the project. The application indicates that the project would provide a conforming rear yard. The C-4 zone does not require any courts and permits 100% lot occupancy. If a court is provided for a non-residential use, the width of the court must be a minimum of 3 in/ft. of height, measured from the

¹⁶ See § 2405.7.

lowest level of the court to that elevation, and no less than 12' width. The non-compliant open and closed courts are identified in the Pre-hearing submission dated October 26, 2012, Exhibit E, page A-201.

VII. PUD AND CAMPUS PLAN EVALUATION STANDARDS

The purpose and standards for PUDs are outlined in 11 DCMR, Chapter 24. Section 2400.1 states that a PUD is “designed to encourage high quality developments that provide public benefits.” In order to maximize the use of the site consistent with the zoning regulations, the Applicant is requesting flexibility, as defined in § 2400.2:

The overall goal is to permit flexibility of development and other incentives, such as increased building height and density; provided, that the project offers a commendable number of quality public benefits and that it protects and advances the public health, safety, welfare, and convenience.

Section 2403 further outlines the standards under which the application is evaluated:

The impact of the project on the surrounding area and the operation of city services and facilities shall not be found to be unacceptable, but shall instead be found to be either favorable, capable of being mitigated, or acceptable given the quality of public benefits in the project.

Second-stage PUD Conditions

The Campus Plan / PUD previously approved for the GW Foggy Bottom campus contains numerous conditions for the overall development of the campus and for future second-stage PUDs. The Applicant has demonstrated that the application complies with relevant second-stage PUD filing requirements for Site 75A, as outlined in the Campus Plan / PUD.¹⁷

Public Benefits and Amenities

Sections 2403.5 – 2403.13 of the Zoning Regulations discuss the definition and evaluation of public benefits and amenities. In its review of a PUD application, § 2403.8 states that “the Commission shall judge, balance, and reconcile the relative value of the project amenities and public benefits offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case.” To assist in the evaluation, the Applicant is required to describe amenities and benefits, and to “show how the public benefits offered are superior in quality and quantity to the typical development of the type proposed...” (§ 2403.12). Public amenities are defined in § 2403.7 as including “one type of public benefit, specifically a functional or aesthetic feature of the proposed development that adds to the attractiveness, convenience or comfort of the project for occupants and immediate neighbors.” The application offers the following amenities and benefits to implement goals called for in the first-stage PUD. It also offered additional amenities and benefits as an offset to the additional development gained through the application process.

1. *Urban design, architecture, landscaping or creation or preservation of open space* – The proposed building introduces the use of “fine-grain texture of glass fins” presented in a “wave pattern” to articulate the Pennsylvania Avenue façade design.¹⁸ The main lobby for the office building would be double height. The application states that the ground floor would have vertical mullions project every 10' in order to create a more engaging street level rhythm, and the two-story base would be recessed from the property line along Pennsylvania Avenue. A minimum of 6,637 square feet of ground floor

¹⁷ See University’s November 2, 2011 application, pages 26-28.

¹⁸ See University’s November 2, 2011 application, page 12.

retail and service uses would be provided along Pennsylvania Avenue to encourage active street life. The rear of the building would be articulated, with the top story incorporating a small setback and terrace.

2. *Site planning, and efficient and economical land utilization* – The proposal would redevelop an underused site in a location within close proximity to a Metro station (Foggy Bottom – GWU Metrorail station), several Metrobus lines, the D.C. Circulator, and a Capitol Bikeshare and Car-sharing locations.
3. *Transportation features* – In association with the project, the alley would be reconfigured to enhance its overall utility and to better service the development’s parking and loading.¹⁹ The project would provide 179 vehicular parking spaces. A full complement of required loading and service berths would be provided: 3 loading berths (12' by 30'), three loading platforms (100 square feet), and one service delivery space (10' by 20'). Approximately 52 covered bicycle spaces would be provided on the first level of the garage, and another 12 spaces would be provided along PA Avenue.²⁰ A transportation impact study includes a transportation demand management plan for the project.²¹
4. *Environmental benefits* – The application proposes a LEED Gold Rating in the USGBC’s LEED-CS 3.0 2009 Rating system. A LEED checklist and description of commitment was provided with the application. The project also is designed to capture 1.2" of rainfall, assisted by an approximately 5,000 square foot green roof.²²
5. *Housing and affordable housing* – The Applicant proposes to rehabilitate for affordable housing three existing University-owned F Street row houses (2142, 2146, and 2150 F Street NW). The row houses are located about four blocks south of the Development Site and are “currently vacant and uninhabitable.”²³ Seven residential units totaling 7,209 square feet would be created, with a mix of one, two, and three-bedroom configurations. The Applicant’s Pre-hearing submission dated October 26, 2012, Exhibit D, indicates that all seven units would be rented based on affordability at 80% AMI for 30 year terms. The Applicant has indicated that the affordable term would begin to run upon the commencement of the first lease for each unit. Concerning administration of the units, the affordability “[p]rogram will be self-administered, either by GW or by qualified 3rd party management company/Certifying Authority” subject to DHCD approval and enforcement.²⁴ The affordable housing commitment would be memorialized in a covenant recorded in the land records.²⁵

DHCD submitted comments dated October 31, 2012 to OP regarding the Applicant’s latest affordable housing proffer (see Exhibit 6 attached to the OP report for DHCD’s full review). DHCD expressed support for the Applicant’s proffer of units at or below 80% AMI. However, DHCD made the following recommendations:

1. That the Applicant use 30% (rather than 35%) as the maximum household income to determine the maximum rent, which would be consistent with IZ standards.

¹⁹ The alley would be widened and repaved in concert with the proposed development. On July 18, 2012, the Applicant filed an associated alley closing application.

²⁰ See Pre-hearing submission dated October 26, 2012, Exhibit C, page 35.

²¹ See Pre-hearing submission dated October 26, 2012, Exhibit C.

²² See University’s November 2, 2011 application, pages 24 and A-600.

²³ See Pre-hearing submission dated October 26, 2012, page 9.

²⁴ Pre-hearing submission dated October 26, 2012, Exhibit D.

²⁵ Se Pre-hearing submission dated October 26, 2012, page 10.

2. That the calculation to establish month rent be established in order to allow the developer to include the actual dollars within their pro forma. If the Applicant requires tenants to pay their own utilities or other costs part of the tenancy, than these amounts should be reduced from the monthly housing cost.
3. That the Applicant enter into an Affordable Housing Covenant with the District that executes the affordable housing requirements of this proposal and provides the framework for the administration of the units. The Affordable Housing Covenant would then be recorded on the property in a form acceptable to the District and administered by DHCD.

The Applicant also has indicated that the row houses are “located outside the boundaries of the First-Stage PUD but within the boundaries of the proposed campus historic district, and will be contributing buildings to the historic district.”²⁶ GW would consult with the historic preservation office regarding any exterior changes to the row houses.

6. *Uses of special value to the neighborhood or the District of Columbia as a whole* – The project also aims to provide streetscape improvements along Pennsylvania Avenue and an improved public alley system. The application indicates that University is continuing to discuss public benefits and amenities with ANC 2A.

VIII. COMPREHENSIVE PLAN

The Comprehensive Plan (“Comp Plan”) Future Land Use Map designates the bulk of the Development Site as Commercial High Density, with the rear of the Property slightly overlapping with the institutional designation as shown in Exhibit 3 below. The proposed commercial project is not inconsistent with the Comp Plan Future Land Use Map.

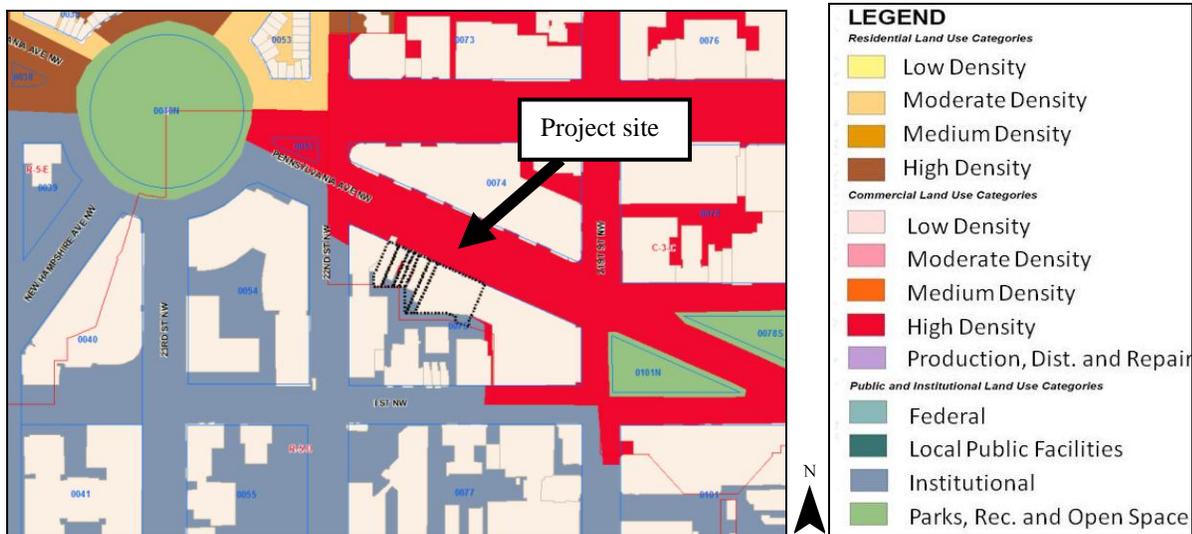


Exhibit 3: Comp Plan Future Land Use Map (subject Property highlighted)

²⁶ Supplemental submission dated August 7, 2012, page 3.

The Generalized Policy Map identifies the subject property for institutional uses.²⁷ In consideration of the Campus Plan / PUD, the Commission previously determined that the Campus Plan / PUD were not inconsistent with the Comprehensive Plan. The project would further policy and action statements contained in the Land Use, Transportation, Environment, Education, and Near Northwest elements of the Comp Plan. The following Comp Plan policies and actions provide additional guidance:

Framework Policies

Colleges and universities make the District an intellectual capital as well as a political capital. They are an essential part of the District's plans to grow its "knowledge based" economy, improve access to learning, and broaden economic prosperity for all District residents. Sustaining our colleges and universities is important, as is protecting the integrity of the communities of which they are a part. Encouraging access to higher education for all residents is vitally important, as is locating higher education facilities in neighborhoods currently underserved by such facilities. 219.5

Much of the institutional land on the map represents colleges and universities; change and infill can be expected on each campus consistent with campus plans. Other institutional sites likewise may see new buildings or facilities added. Policies in the Land Use Element and the Educational Facilities Element address the compatibility of such uses with surrounding neighborhoods. 223.22

Policy LU-1.3.2: Development Around Metrorail Stations

Concentrate redevelopment efforts on those Metrorail station areas which offer the greatest opportunities for infill development and growth, particularly stations in areas with weak market demand, or with large amounts of vacant or poorly utilized land in the vicinity of the station entrance. Ensure that development above and around such stations emphasizes land uses and building forms which minimize the necessity of automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas. 306.11.

Policy LU-2.3.5: Institutional Uses

Recognize the importance of institutional uses, such as private schools, child care facilities, and similar uses, to the economy, character, history, and future of the District of Columbia. Ensure that when such uses are permitted in residential neighborhoods, they are designed and operated in a manner that is sensitive to neighborhood issues and that maintains quality of life. Encourage institutions and neighborhoods to work proactively to address issues such as traffic and parking, hours of operation, outside use of facilities, and facility expansion. 311.7.

Policy LU-3.2.2: Corporate Citizenship

Support continued "corporate citizenship" among the city's large institutions, including its colleges, universities, hospitals, private schools, and non-profits. Given the large land area occupied by these uses and their prominence in the community, the city's institutions (along with the District itself) should be encouraged to be role models for smaller employers in efforts to improve the city's physical environment. This should include a continued commitment to high quality architecture and design on local campuses, expanded use of "green building" methods and low impact development, and the adaptive reuse and preservation of historic buildings. 315.7.

Policy H-1.1.2: Affordable Housing Production as a Civic Priority

²⁷ The Comp Plan provides that the Generalized Policy Map "highlights areas where more detailed policies are necessary, both within the Comprehensive Plan and in follow-up plans" to manage the designated policy direction. Additionally, the Map should be used to guide land use decision-making in conjunction with the Comprehensive Plan text, the Future Land Use Map, and other Comprehensive Plan maps. See Comp Plan, page 2-28.

Establish the production of housing for low and moderate income households as a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout the city. 504.7.

Policy H-1.2.5: Workforce Housing

In addition to programs targeting persons of very low and extremely low incomes, develop and implement programs that meet the housing needs of teachers, fire fighters, police officers, nurses, city workers, and others in the public service professions with wages insufficient to afford market-rate housing in the city. 504.12.

Policy H-1.3.1: Housing for Families

Provide a larger number of housing units for families with children by encouraging new and retaining existing single family homes, duplexes, row houses, and three-and four-bedroom apartments. 505.6.

Action T-2.3.A: Bicycle Facilities

Wherever feasible, require large new commercial and residential buildings to be designed with features such as secure bicycle parking and lockers, bike racks, shower facilities, and other amenities that accommodate bicycle users. 409.11.

Policy E-1.1.3: Landscaping

Encourage the use of landscaping to beautify the city, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity. 603.6.

Policy EDU-3.3.2: Balancing University Growth and Neighborhood Needs

Encourage the growth and development of local colleges and universities in a manner that recognizes the role these institutions play in contributing to the District's character, culture, economy, and is also consistent with and supports community improvement and neighborhood conservation objectives. Discourage university actions that would adversely affect the character or quality of life in surrounding residential areas. 1214.6.

Policy EDU-3.3.3: Campus Plan Requirements

Continue to require campus plans for colleges and universities located in residential and mixed use zone districts. These plans should be prepared by the institutions themselves, subject to District review and approval, and should address issues raised by the surrounding communities. Each campus plan should include provisions that ensure that the institution is not likely to become objectionable to neighboring property because of noise, traffic, number of students, or other similar conditions. 1214.7.

Policy EDU-3.3.5: Transportation Impacts of Colleges and Universities

Support ongoing efforts by colleges and universities to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, shuttle service, bicycling, and other transportation demand management measures. The provision of adequate on-site parking for institutional uses also should be encouraged. 1214.9.

Policy AC-4.2.3: Colleges and Universities

Recognize the contribution of local colleges and universities to arts and culture in the city and promote continue collaboration to develop additional arts facilities and programs serving the broader community. 1413.6.

Policy NNW-2.5.3: GWU Building Intensity

Consider in principle the concept of increasing density on the existing George Washington University campus for future space and facility needs (as measured by the enrollment, staff, and faculty limits set in the approved Campus Plan) provided that steps are taken to avoid sharp contrasts in height and bulk between the campus and the surrounding community, and to mitigate the effects of increased traffic, parking, and other impacts. 2115.9.

IX. AGENCY COMMENTS

The Office of Planning received comments from DHCD, DC Water, and the Metropolitan Police Department which are attached to this report. OP received brief emails from: 1) Deputy Fire Chief Bruce Faust stating “*I have had a chance to briefly review the plan, and have no concern with what I see. All provisions of the current DC Construction codes should be followed as required*”²⁸; and 2) Robert Summers, Deputy Director of the DC Department of Small and Local Business Development stating “*I have no comments. The plans seem to fulfill a great need for the University.*”²⁹ OP also understands that the Department of Transportation intends to submit comments under separate cover.

X. RECOMMENDATION

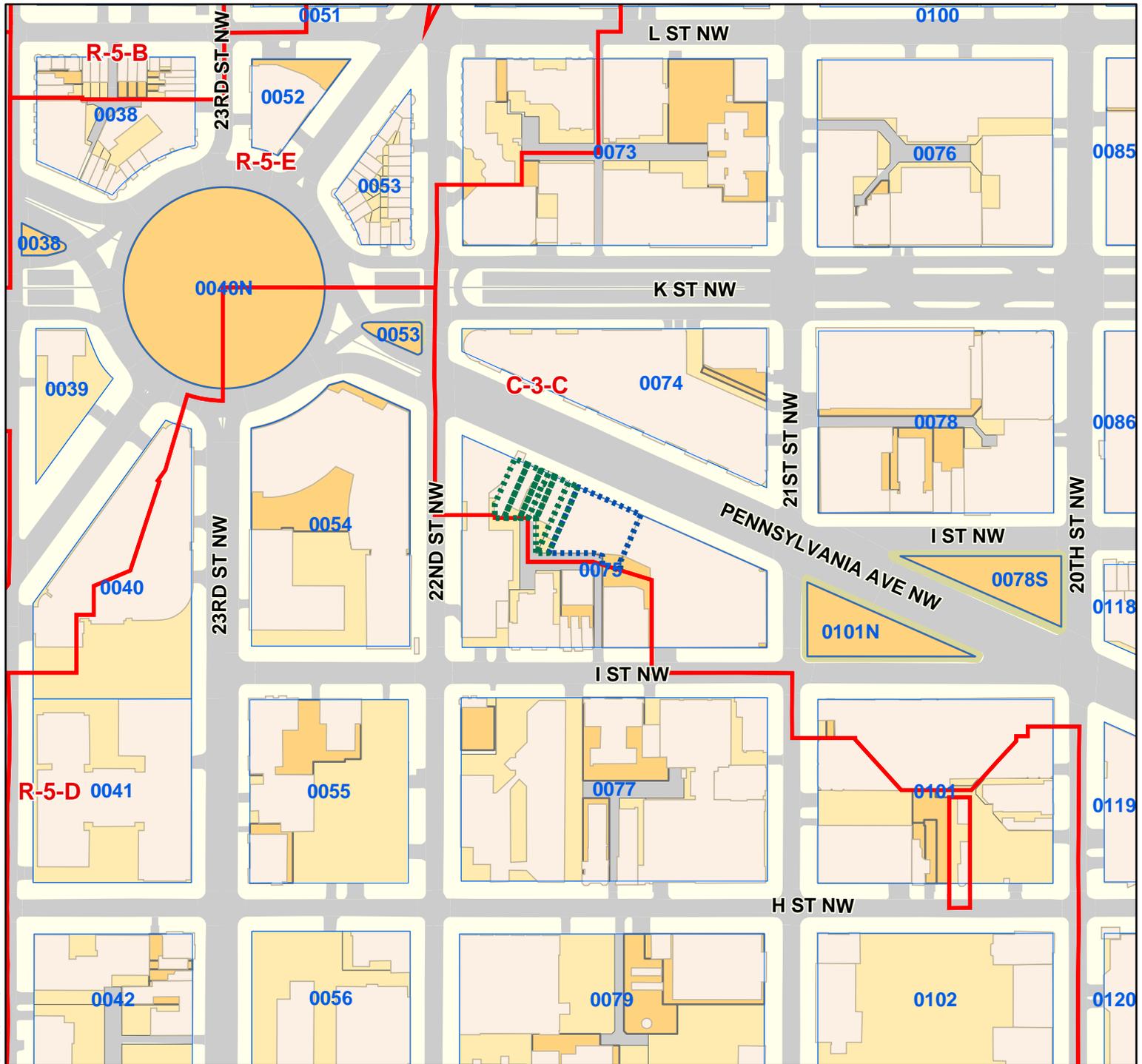
The Office of Planning (OP) concludes that the proposed project is not inconsistent with the Comprehensive Plan. OP further concludes that should the affordable housing proffer be strengthened by incorporating the Department of Housing and Community Development recommendations and the alley be designed or relocation to appropriately mitigate project impacts on the President building, OP recommends approval.

JS/pg
Paul Goldstein, Case Manager

Attachments: Exhibit 1 – Location Map
Exhibit 2 – Aerial View (2011)
Exhibit 3 – Campus Plan Proposed Uses
Exhibit 4 – Campus Plan Development Program Summary
Exhibit 5 – Campus Plan Existing and Proposed Alleys
Exhibit 6 – Communication from DHCD to Paul Goldstein dated October 31, 2012
Exhibit 7 – Communication from the Metropolitan Police Department to Paul Goldstein dated 10/1/12
Exhibit 8 – Communication from DC Water to Paul Goldstein dated 10/3/12

²⁸ Email communication from Chief Faust to Paul Goldstein, dated October 26, 2012.

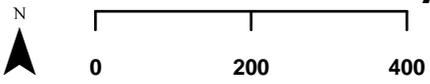
²⁹ Email communication from Robert Summers to Paul Goldstein, dated October 31, 2012.



OPID0022229

Attachment Exhibit 1: Location Map

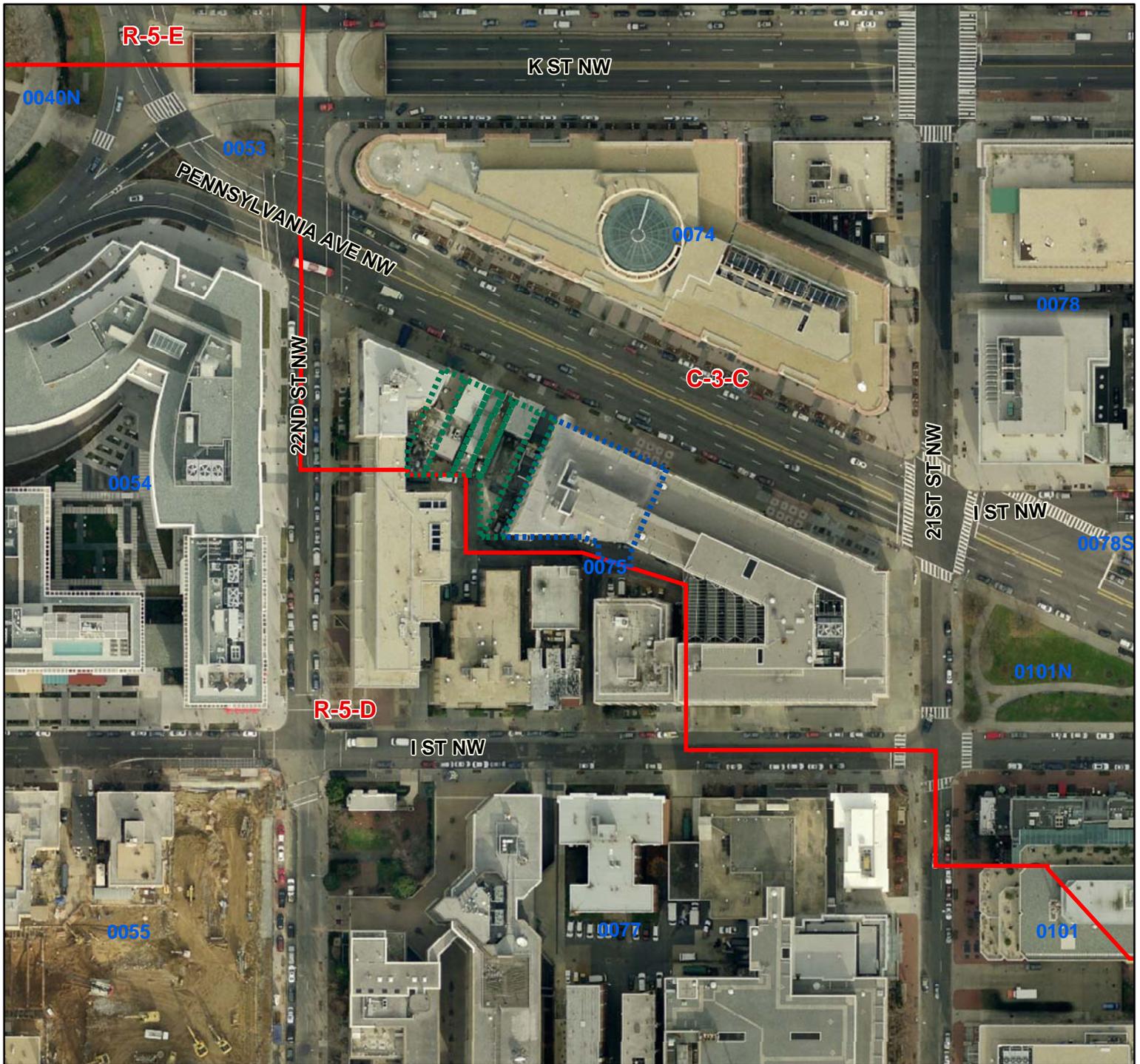
Feet



Government of the District of Columbia
Office of Planning ~ July 19, 2012

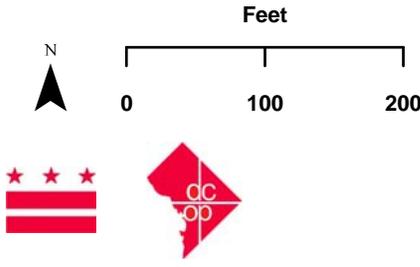
This map was created for planning purposes from a variety of sources. It is neither a survey nor a legal document. Information provided by other agencies should be verified with them where appropriate.

-  Site 75A
-  Lot 863
-  Zoning Districts
-  Property Squares
-  Buildings
-  Alleys and Parking
-  Roads
-  Street Centerlines
-  Water
-  Parks



OPID0022229

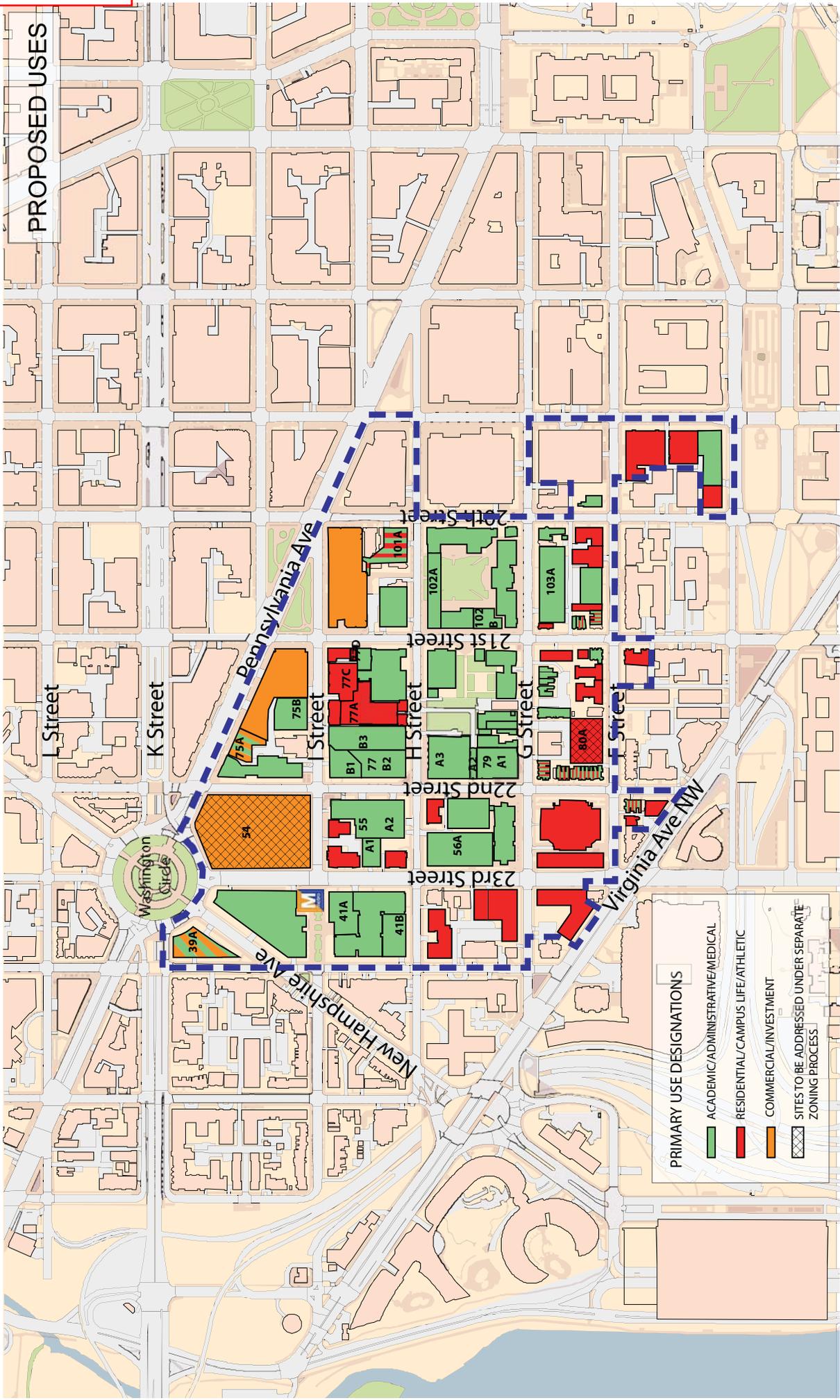
Attachment Exhibit 2: Aerial View



- Site 75A
- Lot 863
- Zoning Districts
- Property Squares
- Buildings
- Alleys and Parking
- Roads
- Street Centerlines
- Water
- Parks

Government of the District of Columbia
Office of Planning ~ July 19, 2012

This map was created for planning purposes from a variety of sources. It is neither a survey nor a legal document. Information provided by other agencies should be verified with them where appropriate.



PROPOSED USES

PRIMARY USE DESIGNATIONS

- ACADEMIC/ADMINISTRATIVE/MEDICAL
- RESIDENTIAL/CAMPUS LIFE/ATHLETIC
- COMMERCIAL/INVESTMENT
- SITES TO BE ADDRESSED UNDER SEPARATE ZONING PROCESS

SCALE 0 100' 200' 400'

DATE July 2006

©2006 Ehrenkranz Eckstut & Kuhn Architects

EXHIBIT J Development Program Summary

July 2006

Square	Site	Site Coverage Assumption	Maximum Height (FT)	Gross GFA (includes new and retained GFA)	Net New GFA Academic/Administrative/Medical ⁴	Net New GFA Residential/Campus Life/Athletic ⁴	Net New GFA Commercial/Investment	Potential Net New Beds (370SF/bed)	Potential Net New Parking (350SF/space)
39	A ¹	90%	90	115,549	93,465	0	0	0	(24)
41	A	100%	90	130,466	94,466	0	0	0	0
	B	100%	90	109,563	96,563	0	0	0	0
55	A1	90%	110	65,336	53,009	0	0	0	102
	A2	90%	110	334,908	1,304	0	0	0	(1,004)
56	A	90%	110	275,390	232,507	0	0	0	401
75	A ²	100%	130	122,990	(8,560)	0	109,710	0	0
	B	90%	110	134,914	52,583	0	0	0	193
77	A	75%	110	316,500	0	174,712	0	374	136
	B1	90%	110	98,546	96,284	0	0	0	127
	B2	90%	110	156,017	76,175	0	0	0	0
	B3	90%	110	166,154	68,569	0	0	0	76
	C	100%	90	65,036	0	48,777	0	0	0
	D	100%	90	9,504	0	9,504	0	26	0
79	A1	90%	110	148,666	131,166	0	0	0	227
	A2	100%	110	9,080	9,080	0	0	0	0
	A3	100%	110	259,251	59,856	0	0	0	0
101	A ³	75%	90	127,245	0	127,245	0	344	42
102	A	90%	65	79,186	67,681	0	0	0	0
	B	90%	65	26,271	26,271	0	0	0	0
103	A	90%	80	185,983	181,628	(13,750)	0	(47)	307
CAMPUS PLAN TOTAL					1,332,047 ⁵	346,488	109,710	697	583

Sites To Be Addressed Under Separate Zoning Process

54		100%	130	867,169	0	0	867,169	0	362
80	A	75%	90	183,119	0	183,119	0	474	178

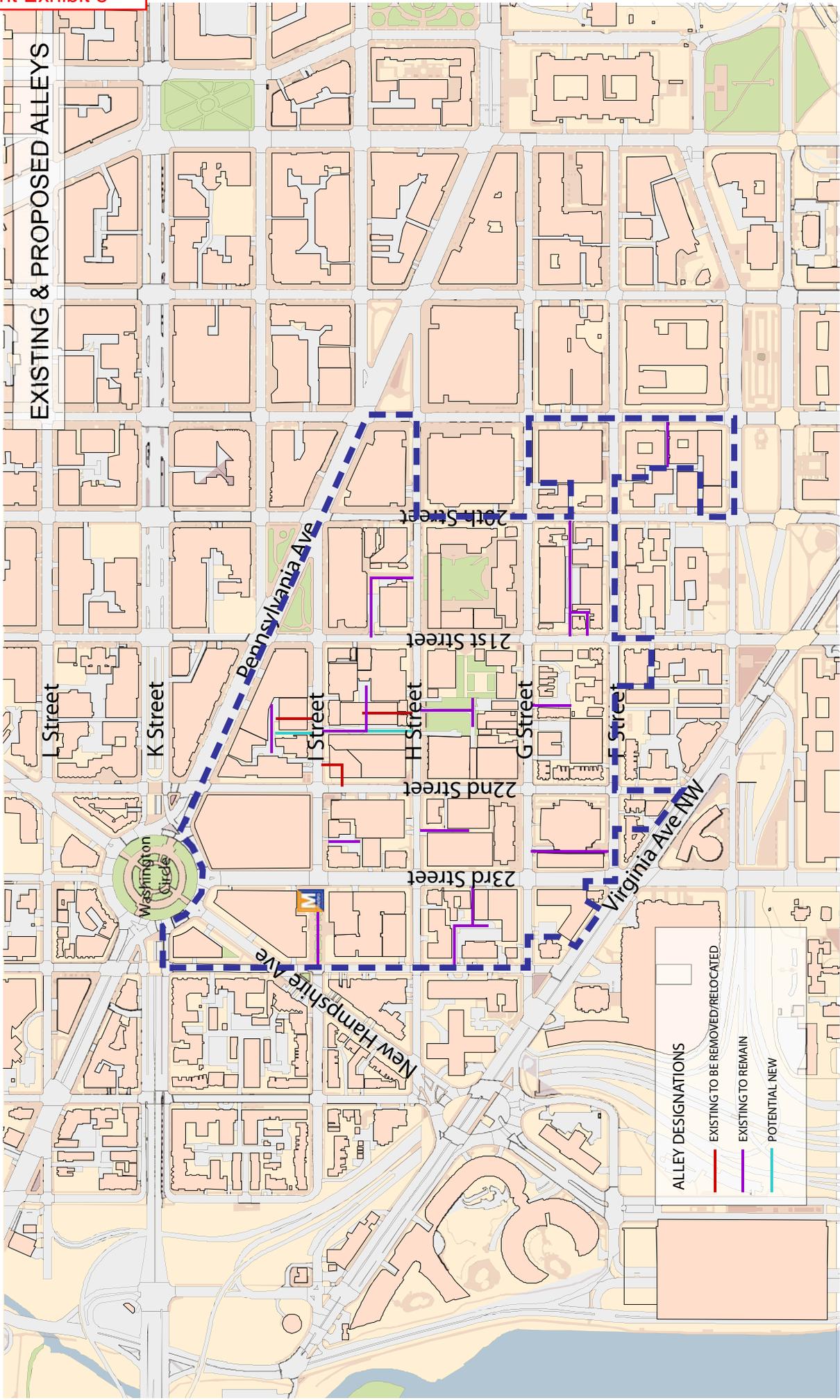
OVERALL CAMPUS TOTALS (NET NEW BEDS & PARKING)

1,171	1,123
--------------	--------------

NOTES:

- 39A included as academic use (designated as academic or commercial/investment)
- 75A included as commercial/investment use (designated as commercial/investment or academic)
- 101A included as residential use (designated as residential or academic)
- GFA includes contemplated first floor retail space on sites 41A, 55A2, 75B, 77A, 77B1, 77B3 (the I Street Retail Corridor concept)
- The academic program space yielded by this development program is 1,665,651 GFA.** This differs from net new GFA in the Academic/Administrative/Medical category, as the net new GFA reflects the demolition of the existing above-grade University Parking Garage (333,604 GFA), which does not provide academic program space (though its above-grade square footage counts as existing GFA in the Academic/Administrative/Medical category).





**GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT**



MEMORANDUM

TO: Paul Goldstein
Development Review Specialist
Office of Planning

FROM: James Thackaberry
Supervisory Project Manager

Gilles Stucker
Housing Resource Administrator

DATE: October 31, 2012

SUBJECT: Zoning Commission Case No. 06-11G/06-12G
George Washington University, Site 75A

As requested in your e-mail of September 18, 2012, the Department of Housing and Community Development (DHCD) has reviewed the above referenced Zoning Commission Application, and supports the requested Stage Two PUD to allow construction of a new eleven-story office building with first floor retail or service uses, modification of the previously approved Stage One PUD to permit incorporation of adjacent Lot 863 in the second stage PUD approval and rezone Lot 863 from C-3-C to C-4. DHCD offers the following reasons for support of the application based upon the specific information presented in the application, as well as reservations related to the creation of the affordable housing element:

- 1.** The property, Site 75A, is one sixteen development sites that George Washington University (GWU) got approved for denser development in a stage one PUD for the Foggy Bottom Campus approved in conjunction with the Campus Plan. The Campus Plan calls for denser development on these sixteen development sites within the Campus boundaries.
- 2.** The approval of the Stage Two PUD will permit the development of a 249, 930 square foot eleven-story office building (130 foot height) with first floor retail or service uses. The building will have 183 vehicle parking spaces and loading dock berths that will be served by a reconfigured alley system that will better serve Site 75A and all the other lots in Square 75.

3. The building will be designed to achieve a LEED Gold Rating in the US Green Building Council LEED-CS 3.0 2009 Rating system. In addition, the architectural design will provide building elements both at street level and on the upper stories to give the building higher level of design and a greater presence on Pennsylvania Avenue NW.
4. The project site will generate increased real estate tax revenue for the District and the lease revenue from the building will allow GWU to better fund the educational programs in its core academic mission.
5. The building project is proposed to provide 7 units of affordable renovated housing off-site but still on Campus (2142, 2146, and 2150 F Street NW). The housing proposed will provide 7 units at or below 80% AMI.
 - a. While DHCD supports the creation of the affordable housing at or below 80% AMI, DHCD has reservations related to how GWU arrives at the rental payment. The developer is proposing that the maximum rent levels be determined using 35% of the maximum household income of a household at the maximum income level. The IZ program, however, considers 30% of income to be “affordable” for a housing payment. The chart below shows the rent levels proposed by the developer and those that are used by the IZ program.

		Developer Proposed (35% HH cost)	IZ Program Method (30% HH cost)
Bedrooms	HH Size Factor	80% AMI	80% AMI
1	2 person (0.8)	\$2,007	\$1,720
2	3 person (0.9)	\$2,258	\$1,935
3	5 person (1.1)	\$2,759	\$2,365

DHCD recommends that GWU use 30% of the maximum household income to determine the maximum rent.

- b. DHCD recommends the calculation to establish the monthly rent be established in order to allow the developer to include the actual dollars within their pro forma. An example of how to set the monthly rent for a one bedroom unit at 80% AMI is as follows:

$$\begin{aligned}
 & \$107,500 \text{ (100\% AMI for a HH of 4, adjusted annually by HUD)} \\
 & \times 80\% \text{ AMI} \\
 & \times .8 \text{ (HH adjustment for a one bedroom which assumes a HH size of 2)} \\
 & / 12 \text{ (per month)} \\
 & \underline{\times .30 \text{ (\% of HH cost)}} \\
 & = \$1720 \text{ monthly housing cost}
 \end{aligned}$$

If GWU will require tenants to pay for their own utilities, or for any other required costs that are part of the tenancy, then these amounts should be reduced from the monthly housing cost.

- c. DHCD recommends that GWU enter into an Affordable Housing Covenant with the District that executes the affordable housing requirements of this case and provides the framework for the administration of the units. The Affordable Housing Covenant will be recorded on the property in a form acceptable to the District and administered by DHCD. DHCD has provided GWU with its Affordable Housing Covenant. To date, DHCD has not received concerns from GWU regarding the Affordable Housing Covenant related to the administration of the affordable units.



GOVERNMENT OF THE DISTRICT OF COLUMBIA
METROPOLITAN POLICE DEPARTMENT

OCT 01 2012

Paul W. Goldstein
Development Review Specialist
D.C. Office of Planning
1100 4th Street S.W., Suite E650
Washington, D.C. 20024

Dear Mr. Goldstein:

This is in response to your agency's request that the Metropolitan Police Department (MPD) offer comments regarding a proposed commercial development (Zoning Commission Case Number 06-11G/06-12G). Specifically, the George Washington University has submitted a proposal for a non-academic commercial development along Pennsylvania Avenue, Northwest.

The proposal was forwarded to Second District Commander Michael Reese, as the development would be located within the confines the Second District. Commander Reese reviewed the plans and has no objection to the proposed development.

I have also reviewed the plans and concur with Commander Reese's assessment. Thank you for the opportunity to provide comments on matters that impact the service that MPD provides to citizens throughout the District of Columbia.

Sincerely,

Cathy L. Lanier
Chief of Police

Goldstein, Paul (OP)

From: Christopher Sandt <Christopher.Sandt@dcwater.com>
Sent: Wednesday, October 03, 2012 10:11 AM
To: Goldstein, Paul (OP)
Cc: Callie Schaper
Subject: RE: Zoning Commission Case No. 06-11G/06-12G (PA Avenue NW Between 21st and 22nd): Request for Comments

Hi Paul,

Please submit the following language as preliminary feedback from DC Water on Zoning Commission Case No. 06-11G/06-12G:

With regard to water infrastructure, there is an existing 6-inch cast iron water main (constructed in 1893) and an existing 12-inch cast iron water main (constructed in 1859) in Pennsylvania Avenue NW. These water mains are available for new connections. Subsequent to water distribution system testing, analysis of flow demand for the proposed development, and analysis of the age, break history, water quality and capacity of the surrounding water system, large connections (3-inch diameter and larger) may require replacement or upsizing (i.e., replacement with larger water main) of portions of the 6-inch and/or 12-inch water mains in Pennsylvania Avenue NW.

The applicant should note that the water mains in Pennsylvania Avenue NW have been chosen to be replaced with a single 12-inch water main under the DC Water Capital Improvement Program (CIP). For future reference, this replacement work is to be completed under the Small Diameter Water Main Replacement Contract #9. The project is scheduled to be bid in June 2013, and construction is scheduled within a 2-year window of 2014-2015. Note that these schedules are approximate and the limits of work are subject to funding. If the CIP work has been completed prior to the construction of the development proposed under this zoning case, the proposed water service connections will need to connect to the new 12-inch water main. If the CIP work has not been completed prior to the construction of the development proposed under this zoning case, the applicant may elect to replace or extend the water main(s) as part of the development's construction drawings in order to meet their project needs.

With regard to sewer infrastructure, the project site is located in an area along Pennsylvania Avenue NW with a combined sewer network. All proposed sanitary and storm sewer services must be connected to the combined sewer mains. There is an existing 18-inch combined sewer main (unknown material and construction date) in Pennsylvania Avenue NW. This combined sewer main is available for new sewer and storm service connections.

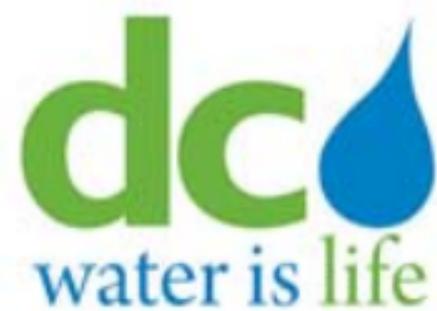
The information above describes the existing infrastructure in the vicinity of the project. A final determination of the ability of those water and sewer mains to service this project can only be made after site development plans and supporting application documentation have been submitted and reviewed by DC Water. If as a result of that review DC Water finds the existing system to be unsuitable for the proposed connections the plans will not be approved.

Please note to the applicant that the document titled, "***GW75_-_Exhibit_F_-_Environmental_Analysis[1].pdf***" references an 18" sanitary main in 21st Street NW. DC Water records indicate that there is no sanitary main within 21st Street NW. The proposed sanitary sewer tie-in will likely need to occur along Pennsylvania Avenue NW on the existing 18" combined sewer main within Pennsylvania Avenue NW.

Feel free to call or e-mail me if you have any questions/comments.

Regards,

Chris



Christopher Sandt, P.E. | Engineer III | DC Water-Permit Operations
1100 4th Street SW, Suite 310 | Washington, DC 20024 | (202) 646-8600
(Direct) 202-646-8623 | (E-Mail) christopher.sandt@dcwater.com
Water is Life! | [Web](#) | [Facebook](#) | [Twitter](#) | [YouTube](#) | [Flickr](#) | [LinkedIn](#)
