

01-10-1986

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
BOARD OF ZONING ADJUSTMENT



Application No. 14455 of George Washington University, pursuant to Sub-section 8207.2 of the Zoning Regulations (11 DCMR 3108.1), for special exceptions under Paragraphs 3101.46 and 4101.43 (11 DCMR 210 and 507) for review and approval of a revised campus plan in R-5-C, R-5-D, SP-2 and C-3-C Districts; in the area bounded by Pennsylvania Avenue on the north; 19th Street on the east, F Street and Virginia Avenue on the south and 24th Street on the west and including a portion of Square 122 extending south of F Street along 19th Street, N.W. (Square 39, Lot 803; Square 40, Lot 36; Square 41, Lot 40; Square 42, Lots 43, 44, 844 and 847; Square 43, Lots 24, 801, 805, 821, 833, 840, 848 and 854; Square 54, Lot 30; Square 55, Lots 27, 851, 853 and 854; Square 56, Lots 30 and 31; Square 57, Lots 55 and 56; Square 75, Lots 41, 46, 858, 861, 863 and 864; Square 77, Lots 5, 46, 47, 49, 50, 57, 58, and 59; Square 79, Lots 39, 40, 63, 64, 65, 808, 850, 853, 854, 856, 857, 858, 859 and 860; Square 80, Lots 2, 45, 46, 47, 50, 51, 52, 54, 55, 800, 811, 820, 822, 824, and 825; Square 101, Lots 58, 59, 60, 865, 866, 867, 868, 870, 872, 873, and 875; Square 102, Lot 46; Square 103, Lots 1, 13, 24, 25, 27, 28, 30, 31, 812, 813, 814, 816, 817, and 818; Square 119, Lot 26; Square 121, Lot 819; and Square 122, Lots 824 and 825).

HEARING DATES: September 10 and October 22, 1986  
DECISION DATES: November 5 and November 25, 1986; February 4, April 1, and April 29, 1987.

FINDINGS OF FACT:

1. This is an application by The George Washington University ("GWU") for special exceptions under 11 DCMR 210 (R-5-C and R-5-D Districts) and 11 DCMR 507 (SP District) for review and approval of a revised campus plan.

2. In Order No. 13966, dated December 30, 1983, the Board directed GWU to prepare and submit an updated campus plan within eighteen months. At GWU's request, and with the concurrence of the Office of Planning, Advisory Neighborhood Commission 2A, and the Foggy Bottom Association, the Board extended the deadline for submission of a revised campus plan to April 30, 1986. On April 29, 1986, GWU filed Application No. 14455 for review and approval of The Campus Plan for the Year 1985 Through the Year 2000 ("Proposed 1985 Campus Plan" or "Proposed Plan").

3. Hearings on the Proposed 1985 Campus Plan were held on September 10, 1986 and October 22, 1986. On September 10 as a preliminary matter, counsel for an individual property owner residing within the campus boundary requested a postponement due to improper notice. The Board denied the request. The record indicated GWU properly posted and maintained the required placards. Further the Board found all property owners within 200 feet of University owned properties received written notice of the public hearing. A second preliminary motion was made and granted allowing James T. Draude, Steve Levy, Sue Schumacher, Ralph Rosenbaum and William Diedrich to intervene as parties in opposition.

4. During the course of the first public hearing, the University attempted to present testimony on the location of a helipad. An emergency medical expert testified to the University's need for a helipad as a receiving site for emergency hospital patients. A noise expert testified to the acceptable level of noise generated by such a use. However, owing to the absence of discussion of a helipad in the Proposed Plan, the University withdrew the proposal for a helipad.

5. George Washington University is located in an urban setting composed of residential, institutional and commercial uses. The campus is generally bounded on the north by Pennsylvania Avenue, on the east by 19th Street, on the south by F Street and Virginia Avenue and on the west by 24th Street. Surrounding the campus are the City's central business district, zoned C-3-C, to the north; institutional, public and private offices, zoned C-4, to the east; high-rise apartment buildings and federal institutional office buildings, zoned R-5-D and SP-2, to the south; and high-rise apartment buildings and townhouse residences beyond, zoned R-5-D and R-5-B, to the west. The subject property is located in the R-5-C, R-5-D, SP-2 and C-3-C Districts.

6. The GWU campus comprises approximately 45 acres. The Medical School and Hospital occupy the northern portion of the campus near Washington Circle. The University's commercially leased investment frontage is located on the northern and eastern edge of the campus along Pennsylvania Avenue and 19th Street, N.W. The central library, the University Center, classrooms, laboratories and faculty offices are concentrated in the central core of the campus. Buildings housing athletic facilities, administrative offices, university related residential uses and parking are located on the periphery of the campus. Interspersed about the campus are privately owned structures used primarily for residential uses. Square 43 in particular, located in the southwest corner of the campus contains a significant concentration of privately owned residential uses.

7. The George Washington University was founded in 1821 and moved to its present location in 1912. It is fully accredited and offers degree and non-degree programs in its Columbian College of Arts and Sciences, School of Medicine and Health Sciences, National Law Center, School of Engineering and Applied Science, Graduate School of Arts and Sciences, School of Education and Human Development, School of Government and Business Administration and School of Public and International Affairs, all of which are located on the campus under consideration.

8. GWU has been involved in campus planning since 1940. A 1950 plan generated by the University guided University growth and physical development until 1970. In 1970, the Board approved a campus plan for GWU in Order No. 10403. As indicated on Exhibit No. 2A of Application No. 10403, the campus boundaries approved in 1970 generally included Pennsylvania Avenue on the north, 19th Street on the east, F Street on the south, and 24th Street on the west. The eastern boundary extended south along 19th Street excluding Square 120, the location of the International Monetary Fund, and continued south below F Street to include Thurston and Mitchell Halls in Square 122. The southern boundary ran around Thurston and Mitchell Halls back to and along F Street until it reached Virginia Avenue. The southern boundary then followed Virginia Avenue to the intersection of 24th Street, N.W. Exhibit 5 of this record (also identified as Applicant's Exhibit 4A) reflects those boundaries faithfully, and a copy thereof is included herein for reference.

9. The 1970 Campus Plan delineated four "functional areas" -- a "core" academic area including the central library, university center, classrooms and laboratories, and faculty offices; a "peripheral" area including athletic facilities, administrative offices, dormitories and parking; a "medical school/hospital" area; and a "high value frontage" area consisting of University-owned buildings which it leases out for commercial purposes, but which were then and are intended ultimately for University use. An Illustrated Site Plan and a Staging Plan depicted the location and prioritized into three phases the construction of anticipated new structures within the four functional areas.

10. Guided by 1970 Plan, GWU added 3,672,475 gross square feet of new buildings to the campus. Forty-eight percent of this new construction or 1,771,363 gross square feet was for educational purposes including the Gelman Library, the National Law Center complex, the Academic Center, the University Support Building, a two-story hospital addition, the Duncan Pavilion, the Walter G. Ross Hall, the Paul Himmelfarb Library, and a parking garage. Fifty-two percent of the new construction was for commercial/investment structures including the Thomas A. Edison Building, the World Bank Building, the Joseph Henry Building addition, and 2000 Pennsylvania Avenue.

11. 11 DCMR 210 and 507 provide that a college or university which is an academic institution of higher learning, including a college or university hospital, dormitory, fraternity or sorority house proposed to be located on the campus of a college or university, is permitted as a special exception in a residential district (Section 210) and in a special purpose district (Section 507), provided that:

- a. Such use is so located that it is not likely to become objectionable to neighboring property because of noise, traffic, number of students, or other objectionable conditions (11 DCMR 210.2 and 507.7);
- b. In R-1, R-2, R-3, R-4, R-5-A and R-5-B Districts the maximum bulk requirements normally applicable in such districts may be increased for specific buildings or structures provided the total bulk of all buildings and structures on the campus shall not exceed the gross floor area prescribed for the R-5-B District. In all other residential districts similar bulk increases may also be permitted provided the total bulk of all buildings and structures on the campus shall not exceed the gross floor area prescribed for the R-5-C District (11 DCMR 210.3);
- c. The applicant shall submit to the Board a plan for developing the campus as a whole, showing the location, height, and bulk, where appropriate, of all present and proposed improvements, including, but not limited to buildings, parking and loading facilities, screening, signs, streets, and public utility facilities, athletic and other recreational facilities and a description of all activities conducted or to be conducted therein, and of the capacity of all present and proposed campus development (11 DCMR 210.4 and 507.4);
- d. Within a reasonable distance of the college or university campus, the Board may also permit the interim use of land or improved property with any use which the Board may determine is a proper college or university function (11 DCMR 210.5 and 507.5);
- e. Before taking final action on an application for such use, the Board shall have submitted the application to the District of Columbia Office of Planning and the District of Columbia Department of Transportation for review and report (11 DCMR 210.6); and

- f. In approving an application for a specific college or university building or use, the Board shall determine that the proposed building or use is consistent with the approved campus plan, and further is not likely to become objectionable to neighboring property because of noise, traffic, number of students or other objectionable conditions (11 DCMR 507.8).

The Proposed 1985 Campus Plan

12. In preparing the Proposed 1985 Campus Plan, the University was guided by the following planning factors:

a. Academic Planning.

The Proposed Plan notes programmatic recommendations of the Commission for the Year 2000, a group of faculty and University administrators directly influence future University growth and development. The Commission's report emphasizes the University's continuing objective to build an educational institution with a strong national and international reputation for academic excellence. The Commission's report also offers the following specific recommendations:

- develop the University as a research institution;
- develop a communications program;
- enhance the performing arts curriculum and the general role of the performing arts in campus life;
- provide modern science and engineering laboratories;
- improve the information acquisition capabilities of the University's three libraries;
- develop an international emphasis in all schools and colleges;
- develop a School of Public and International Affairs; and
- develop a Center for the Study of Public Policy.

b. The Comprehensive Plan for the National Capital.

The Proposed Plan recognizes the need for consistency with the Comprehensive Plan (D.C. Law 5-76, as amended). The Proposed Plan notes the Generalized Land Use Map depicts the general land-use in the Campus area as institutional.

The campus' northern and eastern frontage is designated high density commercial. The University stated approximately 33 Comprehensive Plan policies are applicable to the Proposed Plan and the University believes the Proposed Plan is consistent with these policies.

c. Need for Flexibility.

The Proposed Plan notes that incomplete University ownership of all land within the campus boundary renders the definitive siting of proposed buildings pending completion of land assembly impossible. Further, detailed building envelopes are not feasible until programatic details and funding arrangements have been worked out for a specific development proposal.

d. Ownership of Privately Held Land.

The University owns approximately 83 percent of the land within its campus boundary. The remaining 17 percent consists of privately owned parcels. In order to unify the campus and adequately fulfill the University's educational mission, GWU enunciates as a goal of the Proposed Plan University acquisition of all property within the campus boundary.

e. The Zoning Envelope.

Zoning Districts surrounding the campus permit high density development with Floor Area Ratios (FAR) ranging from 6.0 to 10.0. Residential R-5-C zoning, which covers the bulk of the campus, limits campus development to an aggregate FAR of 3.5. However, the Zoning Regulations permit individual University buildings within Residential Districts to exceed this 3.5 maximum.

f. Income Producing Properties.

The Proposed Plan notes reduction in federal aid coupled with rising costs renders it essential for the University to maintain its commercial structures along the campus' northern and eastern border as income producing properties. The income derived from these properties eliminates the need for

substantial tuition increases and permits GWU to keep its tuition consistent with other comparable education institutions.

g. Off-Campus Uses.

University officials testified the finite amount of land within the campus boundary and the occasional short term nature of grant monies necessitate University use of off-campus space to meet on-going needs. Off-campus uses include a satellite campus at a site remote from the main campus for such activities as applied research, continuing study in technological fields, and partnerships with industry.

h. Student Enrollment.

The Proposed Plan anticipates enrollment will stabilize at 20,000 students by the year 2000.

i. Structure Function.

The Proposed Plan notes older university structures require renovation in order to keep pace with changes in educational, research and health care programs. However, the renovation of older buildings to achieve energy conservation, life-safety, building accessibility and efficient use of space frequently proves to be difficult. Accordingly, construction of new structures responsive to current demands and changing technology usually represents the most practical alternative.

13. The Proposed 1985 Campus Plan states the following land-use policies to guide campus growth and physical development:

- a. The campus will be built at relatively high densities in accordance with its central and highly accessible location.
- b. The University will seek to acquire all property within its boundaries.
- c. The special character of the campus as contrasted with its surroundings will be expressed through a unified and distinctive open space system with careful landscaping and pavement treatment on street frontages and in open spaces penetrating city blocks.

- d. Provision will be made wherever possible for separation of pedestrian from automobile circulation including use of interior open spaces for pedestrian movement.
- e. Buildings of architectural or historic interest will receive special consideration.
- f. University buildings requiring the greatest level of access will be given the most central location with good access to interior circulation. These include the Gelman Library, the Marvin Center, classrooms and laboratories, and faculty offices.
- g. The facilities of the Medical Center will be clustered around the University Hospital.
- h. Buildings requiring less accessibility will be located on the periphery of the campus; these include some residences, administrative offices, athletic facilities, some parking facilities, and support services.
- i. High density investment property office buildings will be located on commercial thoroughfares.

14. The Proposed 1985 Campus Plan covers the time period 1985 through the year 2000. University officials selected a 15 year time frame because it takes a minimum of five to seven years to plan and construct a single development project once land assembly is completed.

15. The Proposed Plan calls for continuation of the campus boundaries approved by the Board in 1970.

16. The Proposed 1985 Campus Plan articulates the University's continuing goal to acquire all property within the campus boundary. The University seeks to acquire 100 percent of the property within the boundary in order to establish an integrated campus with a strong campus identity.

17. The proposed 1985 Campus Plan calls for an increase in the campus student, faculty and staff population as follows:

	<u>Existing</u>	<u>Proposed</u>	<u>Increase</u>	<u>Percentage Increase</u>
Students (Full Time Equivalent)	12,474	14,000	+1,526	12%
Students (Headcount)	17,445	20,000	+2,555	15%

Faculty	1,479	1,550	+71	5%
Staff	9,900	10,023	+123	2%

18. The 15 percent increase in enrollment over the life of the plan translates to approximately one percent annual growth. The University anticipates this growth will result from enhanced academic reputation and expanded recruitment efforts.

19. The 1970 Plan provided for the ultimate reversion of commercially leased investment frontage structures to University use for educational purposes. The Proposed 1985 Campus Plan advocates continued use of the University's investment frontage properties for non-University commercial use. The University seeks this change in policy because the income derived from the commercial leases offsets rising costs and permits GWU to keep its tuition competitive with other comparable educational institutions. Further, architectural and functional limitations render conversion to educational facilities difficult as do long term lease arrangements.

20. The Proposed Plan calls for continued use of interim leased space. The applicant currently leases 224,726 gross square feet of floor space, the majority of which is located outside the campus boundary. This leased space accommodates short term programs or activities frequently funded by temporary grants. Leased space also provides classroom space for specialized student populations including adult education programs in Bethesda and Crystal City.

21. Subsequent information submitted by the University described the University's plans for a satellite campus in Loudoun County, Virginia. The University envisions the Satellite campus as including undergraduate and graduate level teaching programs and educational research in partnership with industry. Specific programs likely to be offered include computer sciences, communications engineering, administrative sciences and management, and operations research. The University anticipates the Loudoun County campus will impose a minimal impact on the downtown campus. GWU anticipates an insignificant increase in staff and faculty at the downtown campus as a result of the Loudoun County facility. Further, the University incorporated this increase into its supplemental filing on projected faculty and staff growth. Finally, the University notes satellite campus activities will augment and supplement programs offered at the University's main campus. The University intends, however, to offer academic and administrative direction for the satellite campus from its downtown headquarters.

22. The Proposed 1985 Campus Plan incorporates the concept of building height relief into an area generally bounded by I Street to the north, including the site on

which the President condominium is located; 20th Street to the east; the middle of Squares 80 and 103 to the south; and the middle of Squares 56 and 55 to the west. Within this area the Plan proposes a 90 foot height limit. The University seeks the height relief in order to increase the floor to floor height of new structures rather than density (Floor Area Ratio). The height increase permits incorporation of standard and specialized building systems for laboratories, utilities, lighting and telecommunications into newly constructed structures. To achieve the desired height, the University intends to file appropriate applications with the Zoning Commission.

23. The Proposed 1985 Plan anticipates the addition of between 1,940,000 to 2,510,000 gross square feet of floor space within the campus boundary over the life of the Proposed Plan. Fifty percent of the project growth in building space results from the need to replace obsolete facilities, relieve overcrowding in existing facilities, and return off-campus uses to campus facilities. Thirty-three percent will accommodate changes in academic programs. Seventeen percent results from the 15 percent enrollment increase anticipated over the life of the Plan.

24. The 1985 Campus Plan refines the four land-use categories of the 1970 Plan into five. The five proposed land-use categories include:

- Educational Mixed Use - classrooms, laboratories, libraries, student activities facilities, faculty offices, parking, parks and open space, and limited support functions.
- Residential - housing both temporary and long term for students and other tenants, fraternities, and sororities.
- Support - athletic facilities, administrative offices, physical plant facilities, auxiliary services, parking, and limited educational mixed use functions.
- Medical - hospital, clinics, medical school, medical library, parking, and related support functions.
- Investment Frontage - income-producing properties.

25. The 1985 Campus Plan allocates the proposed additional building space among the five land-use categories as follows:

- a. Educational Mixed Use accounts for approximately 700,000 to 900,000 gross square feet of the proposed

additional building space. The University proposes to allocate this gross square footage between four building envelopes ranging in size from 100,000 to 350,000 square feet. The preferred site for any one of the four proposed Educational Mixed Use structures includes sites located within Squares 56, 77, 79, and 102. Alternative sites include Squares 101 and 103. The University's priority uses within this category include multi-purpose facilities consisting of laboratories, classrooms, and support and auxiliary space to serve a range of needs in scientific programs. Expanded library facilities also constitutes a University priority within this category.

- b. Residential and Residential Mixed Use accounts for approximately 100,000 to 150,000 gross square feet. The plan proposes only one building envelope to be located on one of two preferred sites within Square 77 or an alternative site within Square 75. The three sites designated currently consist of the privately owned West End Apartments, Schenely Apartments, and President Condominium.
- c. Support functions including some residential account for approximately 310,000 to 410,000 gross square feet of the proposed additional building space. The university proposes to construct five structures to house support functions with building envelopes in the range of 40,000 to 100,000 gross square feet. The preferred site for any one of the five proposed building envelopes includes sites located within Squares 42, 57, 75, 77, and 103. The University proposes no alternative development sites for uses within this land-use category. Priority uses within this category include administrative space and student athletic facilities.
- d. Medical and Medical related facilities account for approximately 730,000 to 850,000 gross square feet of the anticipated additional building space. The University proposes four building envelopes ranging in size from 50,000 to 500,000 gross square feet. Preferred sites for facilities within this land-use category include sites within Squares 39, 40, 54 and 74. Because the University currently owns all the preferred sites, no alternative sites are indicated. Articulated priorities within this category include a new ambulatory care center (already approved by the Board and under construction); a modern-up-to-date health care delivery facility and multi-purpose classroom and laboratory space for educational and research purposes.

- e. Within its Investment Frontage land-use category, the University proposes to construct one additional income producing structure of approximately 100,000 to 150,000 gross square feet. Sites within Square 75 constitute the preferred site. No alternative sites are selected.

26. The Proposed 1985 Campus Plan calls for the closing of five street segments: the 2000 block of I Street, N.W.; the 2000 block of H Street, N.W.; the western portion of the 2100 block of H Street, N.W.; the 2000 block of G Street, N.W.; and the 2100 block of G Street, N.W. The applicant testified the proposed street closings enhance the campus identity by creating a unified campus and a focused open space system within the campus core.

27. The Proposed 1985 Campus Plan proposes the construction of five above street pedestrian walkways. The location of the proposed pedestrian bridges include: across 22nd Street between the Burns Memorial Building and the University Hospital; across 22nd Street between the existing parking garage on the northwest corner of 22nd and H Streets and the Academic Cluster Building; across 22nd Street between a proposed Educational Mixed Use facility directly abutting the Tompkins Engineering Building and the main University Library; across H Street between the Library and the Academic Center; and across 21st Street between the Marvin Center and a proposed Educational Mixed Use facility. The Proposed Plan calls for construction of the five pedestrian bridges in furtherance of the land-use policy calling for separation of pedestrians and automobiles whenever possible.

28. The proposed 1985 Campus Plan calls for the provision of 2,700 to 3,000 off-street parking spaces. The 1970 Campus Plan established this level of required on campus parking, and the University's traffic consultant testified to the continued ability of this number of campus parking spaces to satisfy adequately University parking demand over the life of the Plan. The consultant derived this conclusion from a study of University student, faculty, and staff travel and parking patterns. The traffic expert further testified to the existence of 2,716 parking spaces on campus and an additional 140 under construction. This total compares with the level established by the 1970 Plan. In addition, the traffic consultant noted the University contracts with the Kennedy Center to provide an additional 200 to 250 parking spaces during the day. Shuttle bus service exists to transport Kennedy Center parkers to and from campus.

29. The Proposed 1985 Campus Plan describes past historic preservation efforts by GWU and notes GWU's commitment "to preserving its past and to maintaining its landmark structures." In September, 1986, GWU and ANC 2A reached an agreement on historic preservation within the

campus area. As evidence of the agreement, the University submitted a copy of ANC 2A's Resolution I-4, dated September 9, 1986 and a letter from the University to the ANC dated September 24, 1986. (Exhibit No. 109). The agreement calls for the ANC and the University to co-sponsor individual historic landmark applications for the following campus buildings: Corcoran Hall, Stockton Hall, Strong Hall, President's House and adjoining house, Woodhull House, Alumni House and Lisner Auditorium.

30. The Proposed 1985 Campus Plan proposes to increase and intensify landscaping within a six block core area of the campus, including distinctive sidewalk paving, trees and other plantings, cast-iron style streetlights, and standardized benches and waste receptacles. The Proposed Plan also calls for the placement of a "three-dimensional symbol", described by GWU's architect as a pylon or obelisk, throughout the campus core to signify the presence of the University.

31. The Proposed Plan acknowledges the University goal to create new facilities that are outstanding in design; strongly reinforce the University's sense of place and identity; add luster to the surrounding community; and reflect positively on the nation's capital.

32. The University anticipates the Proposed 1985 Campus Plan will not create objectionable noise conditions. All construction proposed by the Plan, except construction of interim, off-campus facilities and the Loudon County Satellite Campus, will occur within the campus boundaries. Within the campus boundaries, the Proposed Plan locates activities so as to satisfy the University's need for quiet and secure places of study. In addition, the University intends to design future facilities so as to further reduce noise to the neighborhood. Further, the Proposed Plan confines athletic and recreational activities, which tend to be noise generators, to the Smith Center, a fully enclosed building offering excellent sound containment. Athletic activities also occur at tennis courts located on F Street. The Board approved these tennis courts in Order No. 14420, and to date, the tennis courts have not generated neighborhood complaints. Finally, the University conducts all other athletic and recreational programs off-campus in public areas thereby minimizing further adverse noise impacts on properties neighboring the campus.

33. The University anticipates the Proposed 1985 Campus Plan will not create objectionable traffic conditions within or outside the campus boundary. The University continues to implement a traffic management program designed to reduce campus traffic and parking demand through such measures as charging market parking rates and coordinating a carpool system. In light of this program, the University's traffic consultant testified approximately 43 percent of all people

coming to and from the campus use mass transit. The consultant noted the campus is well situated for mass transit use given the presence of 18 Metrobus routes running through or near the campus and the campus location of the Foggy Bottom/GWU Metrorail station. The University's traffic consultant also anticipated a future 3.2 percent increase in mass transit use by University students, faculty, staff, and visitors owing to the completion of the Metrorail system. As to the circulation, a study of present day and year 2000 traffic volumes for eight intersections undertaken by the University's traffic consultant revealed the subject intersections would continue to operate at acceptable levels of service despite the physical growth forecasted by the University. The consultant studied the intersections selected by the Department of Public Works (DPW) and noted DPW selected the subject intersections because they appeared representative of the entire campus. As to the traffic impact of the proposed street closings, preliminary studies conducted by the consultant indicated a minimal impact on the surrounding street network resulting from the proposed closings even during peak hours. However, the consultant acknowledged the need for remedial measures including possible resignalization of a number of campus intersections and possible two-way designation of F Street. Finally as to parking impacts, the consultant maintained the University provides sufficient off-street parking and constantly monitors its parking practices and facilities in order to determine when additional parking is required.

34. The University anticipates the Proposed 1985 Campus Plan will not create objectionable conditions because of number of students or other objectionable conditions. The Proposed Campus Plan seeks an absolute increase of 2,555 students over the life of the Proposed Plan. The Plan also anticipates enrollment will stabilize by the year 2000. The increased enrollment results in a modest increase in faculty and staff since the Proposed Plan projects only 71 additional faculty members and 123 additional staff members through the year 2000. Noting only 17 percent of the anticipated physical growth's attributable to increased enrollment, the University's architect testified the building program envisioned by the plan results primarily from the need to increase program quality and replace functionally obsolete structures. Further, the architect noted, the Proposed Plan concentrates academic and student facilities within the campus core. This results in the placement of facilities generating high volume activity away from residential areas. On the other hand, the Plan locates facilities generating less student activity on the periphery of the campus. Finally, where the campus abuts private residential development the Proposed Plan minimizes adverse impacts associated with increased physical development by containing University growth within the campus boundary, through inclusion of a policy to preserve historically and architecturally significant

buildings, and incorporation of a policy to build new structures manifesting excellent design.

35. The campus is located within the R-5-C, R-5-D, SP-2 and C-3-C Districts. The University states development proposed within the respective districts comports with the following FAR requirements: 3.5 for development located in the R-5-C and R-5-D; 6.0 for development located in the SP-2 District; and 6.5 for development located in the C-3-C District. The Proposed 1985 Campus Plan states the current gross floor area of the University to be 4,841,888 gross square feet. The Plan further proposes a gross floor area of 6,338,399 square gross square feet inclusive of the floor area of existing structures. The University indicates the projected FAR to be well within authorized limits.

36. As evidenced by Exhibit No. 44, the University maintains compliance with the provision of the Zoning Regulations mandating submission of a unified campus development plan. The following pages reference the specific information required for compliance:

<u>Information</u>	<u>Existing</u>	<u>Proposed</u>
Location	Pages 10, 15	Pages 10, 15
Height	Pages 27, 30	Page 67
Bulk (FAR)	Pages 27, 30	Page 41
Parking & Loading	Pages 33, 35	Pages 71-72
Screening	Pages 25, 27	Page 67
Public Utility Facilities and Waste Management	Pages 36-37	Page 72
Athletic and other Recreational Facilities	Page 32	Page 32
Open Space	Pages 24-26	Pages 59-63
Description of all activities con- ducted or to be conducted therein	Pages 18-19	Pages 48-58
Capacity of all present and proposed Campus development	Pages 46-47	Pages 49-58

37. The University seeks no specific relief for the interim use of land at this time, but anticipates the possible need to seek such relief from the Board in the future. The Board acknowledges the possible future interim space needs of the University and address this issue in its conditions.

38. By this application, the University does not seek special exception review and approval for the construction a specific University building or use. However, the University acknowledges its need for special exception review in the future as it process specific development proposals in accordance with the Proposed Plan. The Board acknowledges the University's future need to process special exception applications and addresses this issue in its conditions.

#### Reports of Government Agencies

39. The Office of Planning (OP), by report dated September 3, 1986, and through testimony at the October 22, 1986 public hearing, recommended conditional approval of the Proposed 1985 Campus Plan. The principal of neighborhood preservation and enhancement guided OP in its review of the Proposed Plan. In formulating its specific recommendations, OP sought to achieve a balance between University and residential uses within the campus boundary. Guided by this philosophy, OP reported on the following issues and offered the following recommendations:

- a. Implementation of the University's policy to acquire all property within its boundaries creates a need to protect residential uses within the boundary from elimination. Given the significant concentration of private residential uses in Square 43, the Square's location on the extreme southwest edge of the campus, and failure of the University to designate Square 43 as a priority development site, OP recommended elimination of Square 43 from the campus boundary. However, believing divestment of existing University owned property within the Square inappropriate, OP recommended use of University owned structures for residential use in their current row dwelling form. Further, to assure a continued residential presence within the boundary, OP recommended that the Schenely Apartments, (2121 H Street); the West End Apartments (2124 Eye Street; and the President Condominium (2141 Eye Street) be used for University related residential purposes if acquired by the University during the life of the Proposed Plan. Finally, OP recommended removal from the boundary of that portion of Square 121 containing the Concordia Church, OP cited as justification for the Church's removal, the historic

landmark status of the Church and the unlikely prospects of future redevelopment of the site.

- b. OP supported the concept of height relief. Its report noted that the University seeks height relief in order to increase floor to floor height of new structures rather than density. The height relief would enable the University to incorporate both standard and specialized building systems for laboratories, utilities, lighting and telecommunications into newly constructed structures. OP stated that permitting a height increase within the core of the campus relieves development pressure on the periphery of the campus where University uses abut privately owned residential uses. OP also reported that the proposed height increase focuses campus development where it belongs - in the central core. Additionally, OP stated that since the University must obtain height relief through a PUD application, the Zoning Commission will gain the opportunity to assess the compatibility of a 90 foot high building with surrounding uses as well as to evaluate thoroughly all design related issues. However, in recognition of existing private residential structures in proximity to certain areas proposed by the University for height relief, OP recommended a scaling back of the area of eligibility. Specifically OP recommended that the area of eligibility be scaled back to the north side of G Street and the south side of Eye Street. It also recommended that the University policy on campus densities be altered to reflect an intent to limit campus densities to those permitted by the Zoning Regulations at the time of the approval of the Proposed Campus Plan. Finally, OP recommended that the request for height relief be considered only in conjunction with a PUD application.
- c. Recognizing the extent to which income from the University's investment frontage structures off-sets rising educational costs and tuition increases, OP recommended that the University be permitted to permanently utilize its existing investment frontage structures for non-University, commercial uses. However, OP urged a prohibition against development of additional commercial buildings within the campus boundary given the overall scarcity of University owned land available for educational uses. OP further recommended that the FAR of University owned, commercially leased structures be included in the University's maximum permitted FAR.
- d. Because the need for interim leased space fluctuates annually, OP recommended that the Board refrain from

restricting the University's use of such space. However, OP recommended that all of the University's short term, interim leased space be located in off-campus commercial zones. OP also felt the Proposed Plan contained insufficient information regarding satellite campus, the educational functions to be located on such campuses and the relationship of satellite campus to future University enrollment and physical growth within the campus boundary. Accordingly, OP recommended inclusion of such information in the Proposed Plan.

- e. Responding to the Plan's proposed preferred and alternative development sites and the proposed generalized building envelopes, OP recommended inclusion of an overall list of development priorities in the Plan. However, a subsequent priority list submitted by the University failed to achieve the desired objective. The subsequent priority list narrowed albeit slightly, the number of building envelopes and possible sites on which these envelopes would be placed. However, it failed to list overall development priorities in descending order of importance. This failure lead OP to recommend a system of advance notice. This system obligates the University to notify OP and ANC 2A of pending development proposals once the University obtains internal University approvals. OP reasoned an early notice system serves a similar notice function as a more specific outline of development activity in the Proposed Plan. As to other recommendations concerning proposed development, OP urged selection of University owned sites as priority sites for future dormitory development. The only sites selected in the Plan for dormitory use are sites held in private ownership. The failure to select University owned sites struck OP as a nonexistence commitment to providing University housing on campus. OP also recommended designation of the remaining privately owned campus frontage along Pennsylvania Avenue as a preferred site for medical related development. OP felt this designation consistent with its prohibition against development of additional campus commercial buildings. OP also believed medical related development along Pennsylvania Avenue relieved pressure internally within the campus for a large medical facility. Finally, OP recommended elimination of the phrase "limited support functions" from the Educational Mixed-Use land use category and the phrase "limited educational mixed use functions" from the Support land-use category. OP felt inclusion of these two phrases rendered the two categories mutually inclusive.

- f. OP concurred with the DPW recommendations set forth in Finding numbered 40 regarding parking, and recommended the provision of between 2,700 and 3,000 off-street campus parking spaces during the life of the Proposed Plan.
- g. Recognizing that ultimate authority for street closings resides with the Council and DPW, OP nonetheless conceptually supported the proposed closing of the 2000 block of H and Eye Streets, N.W. OP reasoned that the proposed closing of these streets creates a unified campus area culminating in the University Yard. However, OP feared traffic congestion and confusion if GWU closed the western portion of the 2100 block of H Street, but out of necessity left the eastern portion of the block open. OP further felt the proposal to close the 2100 block of G Street premature for incorporation into the Proposed Plan, given the significant amount of privately-owned property bordering this block. Finally, OP recommended a parking replacement plan, whereby each street closing application made by GWU to DPW must provide for the one-to-one replacement within existing University parking lots of on-street parking spaces eliminated by the proposed street closing. OP stated that the replacement parking spaces should not be counted in the University's total inventory of permitted spaces.
- h. OP categorically opposed the concept of pedestrian bridges and recommended deletion of all references to pedestrian bridges in the Proposed Plan. OP stated two reasons for its opposition to bridges: (1) Pedestrian bridges obstruct the underlying design of the street system as embodied in the L'Enfant Plan and obstruct natural vistas along streets and (2) The concept of pedestrian bridges is inconsistent with the Comprehensive Plan. Specifically, Section 919(b) of D.C. Law 5076 provides "prohibit second-level pedestrian bridges that drain activity from the street level and compromise the visual integrity of the street plan.
- i. OP applauded the University for incorporating design guidelines into the Proposed Plan. However, OP recommended revision of these guidelines to incorporate a statement of intent to relate the height, bulk and design of proposed structures to adjacent and nearby structures; to relate the character of a building its use; and to achieve a balance between old and new University buildings.
- j. OP criticized the open space system proposed by the Plan, because it focused entirely on streetscape

improvements within the campus core to the exclusion of improvements to the peripheral areas of the campus. Given the University's goal of creating a strong sense of campus, OP recommended the preparation of a detailed streetscape plan applicable to the entire campus.

40. The Department of Public Works, by report dated September 3, 1986, and through testimony at the October 22, 1986 public hearing, reported on the following issues and offered the following recommendations:

- a. Noting 49 percent of GWU students, faculty and staff drive to campus, and that many of these automobile commuters do so as individual drivers, DPW recommended on-going enforcement of traffic mitigation measures. Recommended traffic mitigation measures designed to minimize traffic volumes and impacts on local campus streets included:
  - o Encourage mass transit use by "market rate" parking rates.
  - o Provide sufficient off-street parking on campus to minimize demand for on-street parking.
  - o Provide additional parking at the Kennedy Center and provide University shuttle bus service between the parking and campus.
  - o Provide more on-campus housing for students and adequate bike parking facilities to encourage bike use.
  - o Concentrate on obtaining a higher vehicle occupancy rate through coordination with the DPW Rideshare Coordinator, and undertake the following activities to implement a campus ride share program:
    - o Appoint a staff person on a full or part time basis to coordinate the University's rideshare program.
    - o Coordinate directly with the Government of the District of Columbia's Rideshare program, D.C. RIDES.
    - o Identify and utilize the University's employee communication channel i.e., interoffice mail, to publicize the existence of the campus rideshare program.

- Distribute rideshare match applications desk-to desk annually, or biannually to all faculty, staff and to the extent possible, students.
- Provide incentives for carpooling such as subsidies or priority parking.
- Develop a University sponsored vanpool program.
- Develop a University rideshare program/brochure for distribution to employees and students.
- Utilize existing University publications to publicize the rideshare program.
- Distribute rideshare information at strategic points throughout the campus.

In recommending the above measures, DPW noted the University's sensitivity to local traffic concerns. DPW also reported that 43 percent of GWU's students, faculty and staff used mass transit, and DPW anticipated this number would increase by 3.2 percent upon completion of the Metrorail system. Finally, DPW recommended continued University adherence to those land-use policies which help reduce vehicular traffic within and around the campus. Specific policies referenced by DPW included: Separating pedestrian and automobile circulation wherever possible; placing buildings requiring the greatest access in central campus locations; placing buildings requiring less accessibility on the periphery; and locating high density investment property on commercial thoroughfares.

- b. Noting that the proposed street closings contributed to the creation of a focused open space system within the campus core, DPW nonetheless refused to endorse the five proposed street closings in the Proposed Plan. DPW felt it best to evaluate the merits of each closing individually upon application by the University. Further, DPW recommended all future street closing applications include detailed feasibility studies with thorough analysis of the following issues:
- Diversion of traffic and its impact;
  - Traffic impact on other streets and intersections;

- Vehicular and safety impacts;
  - Impact on general traffic circulation;
  - Impact on residential properties;
  - Impact on commercial establishments;
  - Impact on emergency vehicle access;
  - Impact on delivery trucks; and
  - Any necessary changes in existing traffic circulation, i.e., one-way vs. two-way traffic flow; and
  - Impact on existing curb parking and parking meter revenue. DPW also described the existing street closing procedure noting each proposed closing must be reviewed by various D.C. government agencies and City Council. DPW stressed established procedures include ample opportunity for individual landowners to object, and reference to a street closing in the Proposed 1985 Campus Plan does not alter established procedures nor negate opportunity for future citizen review and comment.
- c. As with the proposed street closings, DPW withheld endorsement of the five proposed pedestrian bridges. Again, DPW felt it best to evaluate the merits of each bridge upon application by the University. Further, DPW recommended the inclusion of detailed feasibility studies with each individual bridge application.
- d. DPW concurred with the University's proposal to maintain the 2700 to 3000 range of off-street campus parking spaces established by the 1970 Campus Plan. DPW believed this range reasonable in light of the anticipated future increase in metrorail ridership to the University and University implementation of traffic mitigation measures designed to decrease campus traffic and hence campus parking demand. DPW further reported the existing number of parking spaces (2,716)) and parking spaces under construction in conjunction with the Burns Medical Building (140) readily fell within the established range. Finally, DPW noted the University has access through a leased arrangement to an additional 200 to 250 parking spaces at the Kennedy Center although

these spaces do not count toward the University's overall campus parking totals.

- e. Having reviewed the existing water and sewer systems of the University, DPW determined the existing systems capable of servicing future development proposed by the 1985 Campus Plan. However, DPW noted a number of combined sanitary and storm water sewers in the campus area require separation into two independent systems.

#### University Response to Government Reports

41. Responding to OP's concerns regarding the absence of an overall list of development priorities, the University submitted a list of its highest development priorities within each category. Within the Educational Mixed Use land-use category, the University cited as its priority two buildings ranging in size from 250,000 to 350,000 gross square feet and 150,000 to 200,000 gross square feet. The University proposes to locate these buildings on Squares 56 and 79 or possibly Square 77. Within the Residential category, the University states its priority to be one building of approximately 100,000 to 150,000 gross square feet located within Square 77. Within the Support land-use category the University cites two buildings as its priority. The two priority support facilities range in size from 75,000 to 100,000 gross square feet and 60,000 to 80,000 gross square feet. Proposed locations for priority support facilities include sites within Squares 57 and 77. If it proves impossible to construct a support facility in Square 77, the University proposes in its stead a 100,000 to 150,000 mixed residential/support facility within Square 42. The priority medical project consists of a 50,000 to 60,000 building located on Square 54. The priority investment frontage project is identical to that originally proposed - a 100,000 to 150,000 gross square foot building located on Square 75.

#### Report of the Advisory Neighborhood Commission

42. Advisory Neighborhood Commission (ANC) 2A, by report dated August 12, 1986, by supplemental report dated September 9, 1986, and by testimony at the October 22, 1986 public hearing, recommended denial of the Proposed 1985 Campus Plan. In the alternative, the ANC recommended the adoption of specific amendments contained in its reports. The ANC testified to its awareness of the specific contents of the Proposed 1985 Plan prior to the Plan's publication. This awareness resulted from an ongoing series of discussions with University Officials and OP representatives held prior to the Plan's submission to the Board. Specific advice offered by the ANC to the Board included the following:

- a. ANC 2A supported the boundary deletions proposed by OP and urged the Board to also delete St. Mary's Church in Square 42, the Schenley Apartments and the West End Apartments in Square 77, and the President Condominium in Square 75. The ANC felt deletion the best means of preserving St. Mary's Church which like the Concordia Church has achieved landmarks status. The ANC believed deletion of the three apartment buildings the only way to preserve on-campus rental housing and prevent tenant displacement.
- b. ANC 2A found the University's goal of acquiring all property within the campus boundary contrary to longstanding policies and goals of the ANC. The ANC noted such a goal adversely affects property owners within and outside the campus boundary. The ANC recommended deletion of this goal from the Proposed Plan and the addition of policy statements that the University will preserve existing non-University residential uses within the campus boundary, promote diversification and balance of uses and structures, and confine large-scale development to the north and east of Foggy Bottom.
- c. The ANC objected to any increase in enrollment beyond current levels. The ANC felt the Proposed 1985 Campus Plan failed to explain the need for increased enrollment. The ANC believed any enrollment increase constituted an objectionable condition aggravated by the University's failure to provide sufficient on-campus student housing. The ANC noted that insufficient campus housing causes students to compete for apartments in the Foggy Bottom area. This competition crowds out moderate income residents who could otherwise live and work in the area. To resolve this problem, ANC 2A recommended University construction of on-campus housing in sufficient quantity to accommodate all undergraduate students.
- d. ANC 2A objected to permanent use of the University's investment frontage as income producing properties. The ANC called for a halt to campus construction of Educational Mixed-Use and Support facilities until such time as University uses occupied completely the Joseph Henry Building. Further, the ANC recommended conversion of GWU's remaining commercial buildings along Pennsylvania Avenue and 19th Street to University use upon expiration of the initial leases. The ANC reasoned the 1970 Plan allowed a substantial expansion of GWU buildings into a residential district where Universities are not permitted as a matter of right. The ANC noted several of

the buildings constructed exceed normal density limits. The ANC believed this substantial intrusion to be a function of GWU representations that future University needs could be accommodated in the large scale buildings on Pennsylvania Avenue and 19th Street. Further, the ANC found the three reasons offered by the University - current long term lease agreements, architectural and functional limitations and need to offset rising costs affecting tuition - insufficient justification for the policy change sought by the University.

- e. ANC 2A opposed the University's use of off-campus space within ANC 2A's boundaries except for short term leases (less than two years) to accommodate dislocations caused by renovation or construction projects. The ANC further recommended University termination within five years of the use of existing off-campus space within ANC 2A's boundaries. The ANC offered these recommendations because of the belief that University use of off-campus space with ANC 2A represents a defacto expansion of the campus boundaries. In a subsequent report to the Board, ANC 2A concurred with the OP recommendation that off-campus uses be limited to commercial districts.
  
- f. ANC 2A opposed any increase in the height limits currently applicable to the campus. As a protective measure for nearby residential development, the ANC recommended specific height limitations at specific locations within the campus (See g below). Further, ANC 2A recommended the inclusion of a policy in the Proposed Plan whereby the University acknowledged the campus as a transition or buffer zone between the high-density business areas to the north and east and the residential areas to the south and west, agreed to limit the FAR of University development in campus residential zones to 3.5 and ceased planning on the basis of any future height increases. ANC 2A offered these recommendations because the Proposed Plan lacked assurances that the increased building height would be used to increase floor to floor heights rather than to increase density by adding floors. Further, the ANC noted the Board lacked authority to increase height or bulk or to rezone the campus. The ANC felt this fact rendered reference to such zoning changes inappropriate for inclusion in a plan approved by the Board. Finally, the ANC stated proposals to exceed residential zoning limitations aggravated rather than minimized adverse impacts on residential uses.

g. ANC 2A found the Proposed 1985 Campus Plan lacking in details as to future development. The ANC recommended incorporation of more specific information into the Proposed Plan regarding future development. The ANC also recommended the inclusion of a series of design criteria and constraints to mitigate adverse impacts on residential property and to promote diversity of building structures. ANC 2A further stated the overriding consideration governing location of uses on campus should be the minimization of adverse impacts on residential properties. It urged incorporation of a land-use policy to this effect. The specific design criteria and constraints proposed by ANC 2A included the following:

- i) Square 39: No additional buildings shall be constructed on Square 39. The current surface parking lot on that Square shall be maintained as landscaped open space when Square 40 is developed.
- ii) Square 40: Any buildings or structures constructed on the westernmost 50 feet of the Square fronting on 24th Street shall not exceed 40 feet in height and should be architecturally compatible with the residential buildings across 24th Street and New Hampshire Avenue. Any buildings or structures constructed on the northernmost 50 feet of the Square abutting Washington Circle shall not exceed 40 feet in height and should be designed with consideration to the historic structures of L'Enfant's plan for the Circle.
- iii) Square 42: Any buildings or structures constructed on the southernmost 50 feet of the Square shall not exceed 40 feet. Any buildings or structures constructed on the remainder of the square shall not exceed the existing height of St. Mary's Court. As long as GWU does not own St. Mary's Court and St. Mary's Episcopal Church, any buildings or structures constructed by the University in the Square shall be set back at least 50 feet from the east side of St. Mary's Court and at least 50 feet from both sides of the church.
- iv) Square 43: All existing townhouse structures in the Square shall be preserved. The University may renovate and redesign

the interiors to convert the structures to University use.

- v) Square 54: Any redevelopment in the Square shall not exceed the dimensions of the building envelope of the existing hospital.
- vi) Square 55: The University shall eliminate the existing surface parking on the north-east corner of the Square within five years and shall thereafter maintain that area as a landscaped open space, except for the existing driveway into the parking garage.
- vii) Square 57: Any buildings or structures constructed on the westernmost 50 feet of the Square shall not exceed 40 feet in height.
- viii) Square 75: No further construction shall be permitted in the Square as long as it contains non-University owned property. However, this restriction shall not apply to Lot 46 as long as BZA Order No. 14261 remains in effect. If the Order is held invalid, any building or structure constructed on this Lot not exceed 3.5 FAR and shall be constructed on the portion of the Lot that is north of The President Condominium with the balance of the Lot maintained as landscaped open space.
- ix) Square 77: Any buildings or structures constructed on Lots 46-51 shall not exceed 3 stories and 40 feet in height.
- x) Square 79: The existing fire house structure on Lot 5 shall be preserved.
- xi) Square 80: Any buildings or structures constructed on the southernmost 50 feet of the Square shall not exceed 40 feet in height. The University shall preserve the existing townhouse structures on 22nd Street and on Lots 820, 822, 823 and 824. GWU may renovate and redesign the interiors to convert the structures to University use. Any buildings or structures constructed in the Square shall be stepped back from the townhouse structures and from F Street and shall be of a color and material compatible with such

townhouses. The Grant School building shall be preserved.

- xii) Square 103: The University shall not be permitted to increase the height of the existing support building at 2025 F Street. The existing townhouse structures on Lots 29 through 35 and 818 should be preserved. GWU may renovate and redesign the interiors to convert the structures to University use.
  
- h. ANC 2A agreed with OP's recommendation and reasoning regarding University selection of one or more University-owned sites for priority development for residential use. It further concurred with OP as to the deletion of the phrase "limited support functions" from the Educational Mixed Use Land-Use category and the deletion of the phrase "limited educational and mixed use functions" from the Support land-use category. Finally, ANC 2A joined with OP in calling for the provision of an overall list of development priorities in the Plan. However, ANC 2A found the University's subsequent submission on this issue unsatisfactory. The ANC noted the subsequent submission consisted of a list of priorities within each land-use category rather than an overall master list. The ANC also offered specific objections to a number of the stated priorities within each land-use category and/or the density of development proposed.
  
- i. ANC 2A strongly objected to the five proposed street closings and urged deletion of any reference to such closings from the Proposed Plan. The ANC reasoned the Board lacked authority to approve street closings and thus street closing constituted an inappropriate subject for a Board approved Plan. In addition, the University failed to undertake detailed, traffic, parking and other related studies necessary to justify such closings. Further, the proposed closings threatened to eliminate 240 on-street parking spaces as well as block east-west traffic movement through the campus area, thereby aggravating traffic congestion north and south of the campus. The proposed closings also promised to disrupt bus routes and fire engine access to the area. Finally, the ANC noted the proposed closings violated certain provisions of the City's Comprehensive Plan.
  
- j. ANC 2A opposed the five proposed pedestrian bridges and urged deletion of all references to the bridges from the Proposed Plan. As with street closings,

the ANC noted the Board lacked jurisdiction over pedestrian bridges thus rendering pedestrian bridges an inappropriate subject for a Board approved Campus Plan. ANC 2A also indicated pedestrian bridges separate University pedestrian traffic from neighborhood pedestrian traffic, thereby diminishing the safety promoted by the presence of people on the streets. Further, the ANC noted pedestrian bridges obstruct the underlying design of the street system as embodied in the L'Efant Plan, and they also obstruct natural vistas. Finally, the ANC found the proposed bridges violative of the Comprehensive Plan prohibition against "second-level pedestrian bridges that drain activity from the street level and comprise the visual integrity of the street plan".

- k. ANC 2A urged the Board to withhold its approval of the Proposed 1985 Campus Plan until the University agrees to provide an adequate level of off-street parking. The ANC urged determination of campus parking requirements on the basis of sound planning studies and felt the established level of parking should be consistent with the parking reality experienced daily in the neighborhood. The ANC expressed concern that the University's existing parking facilities are already utilized at peak capacity and additional traffic generated by future University growth and development will only aggravate campus parking conditions.
- l. ANC 2A objected to placement of building and uses that generate excessive noise, i.e. support functions, on the periphery of the campus adjacent to residential uses. The ANC cited the Health Sciences and Support buildings as examples of noise generating buildings objectionable to adjacent and nearby residents.
- m. ANC 2A applauded GWU's past efforts at historic preservation. The ANC further described an agreement between the University and the ANC to co-sponsor landmark applications for the buildings described in No. 28 above.
- n. ANC 2A supported the increased and intensified landscaping proposed by the Plan, including sidewalk paving, trees, and other plantings; cast-iron style streetlights; and standardized benches and waste receptacles. However, the ANC objected to the installation of pylons through-out the central campus area to signify the University's presence. The ANC felt the pylons would clutter the neighborhood and believed the signage described in the

Proposed Plan adequate to serve the University's needs. In its second submission, the ANC agreed with OP's recommendation to incorporate campus wide streetscape standards into the Proposed Plan.

Reports of Other Neighborhood Associations

43. The Foggy Bottom Association (FBA), a community/civic organization in the Foggy Bottom/West End neighborhood, appeared as a party in opposition at the hearing. Through testimony and written statement, the FBA called for the deletion of Square 43, the Concordia Church, and St. Mary's Church from the campus boundary. The FBA called for the exclusion of Square 43 because of its location on the edge of campus, the University's limited ownership of property within the Square, the University's failure to designate the Square for priority development and the need to protect and preserve the neighborhood in accordance with the goals of the City's Comprehensive Plan. The two churches required exclusion because of their historic landmark status. On the issue of the University's investment frontage, the FBA opposed the University's continued use of these properties for commercial purposes. The FBA called for academic use of these properties and further urged a prohibition against any additional construction of commercial buildings within the campus boundaries. As to street closing, the FBA opposed the closings in principal because street closings deprive residents of parking and increase and aggravate traffic conditions on surrounding streets. The FBA urged deletion of two closings proposed in the Plan, the 2000 and 2100 blocks of G Street, because of the significant amount of private property bordering these streets. The FBA expressed a willingness, however, to consider the individual merits of each proposed closing at the appropriate time provided each application contained sufficient data, including a compensatory parking proposal for displaced-on-street parking. The FBA also urged deletion of all reference to pedestrian bridges in the Proposed Plan. The FBA expressed opposition to pedestrian bridges because the bridges are inconsistent with the Comprehensive Plan, obstruct natural vistas, require a large financial investment, and segregate neighborhood and University pedestrians. The FBA felt the installation of traffic lights along 22nd Street a better pedestrian safety measure for the University to undertake. On the issue of proposed campus development, the FBA found the Plan lacking in its description of development priorities and satellite campuses. The FBA found University explanations regarding the inability to include site specific building priorities unconvincing. Finally, the FBA concurred with the OP recommendation that University leased space be confined to off-campus commercial districts.

44. The West End Citizens Association by report dated September 10, 1986 opposed the Proposed 1985 Campus Plan. The Association cited as its reasons the proposed increase in

floor space over the life of the Proposed Plan, the failure to increase University parking, the proposed increase in enrollment, the failure of the University to convert its investment frontage structures to University use as required by the 1970 Campus Plan, the University proposal to acquire all land within the campus boundary, the continued University use of property outside the campus boundary, the Plan's proposal to locate noise producing uses adjacent to non-University residential property, the proposed height increase, the proposal to close five streets and the proposal to construct above street pedestrian bridges.

Testimony of Landowners In the Campus Area

45. A representative of the Bureau of Catholic Indian Missions ("Bureau") appeared as a party in opposition. As the owner of two lots located in the 2000 block of H Street, the Bureau objected to the proposed closing of this block. The Bureau urged deletion of all references in the Proposed Plan to this proposed closing at least until such time as the University acquired all property on the block. The Bureau noted the Board lacked authority to close streets and felt it best for the Board to avoid action likely to be construed as tacit approval for the proposed closing. Further, the lack of access to the Bureau's property resulting from a street closing threatened to impose a substantial hardship on the Bureau, detract from the marketability of the Bureau's property, and place the Bureau in an untenable bargaining position with the University, the only likely buyer for the Bureau's property. Upon cross examination, the Bureau's representative noted one occasion when the University temporarily closed the 2000 block of H Street without prior notice to adjoining property owners. The closing seriously inconvenienced the Bureau's planned activities. The Bureau requested notification from the University in the future if and when the University contemplated temporary closings of the street in front of the Bureau's property. The Board finds this to be a reasonable request and addresses this issue in its conditions.

46. An individual property owner residing at 2013 H Street within the campus boundary appeared as a party in opposition. The property owner strongly opposed the proposed closing of the 2000 block of H Street. The property owner noted the proposed closing threatened to decrease the value of his property, impede personal and visitor access to his house, and by eliminating street activity contribute to a general increase in crime.

47. The President Condominium Association, by resolution dated August 26, and by testimony at the public hearing, opposed the Proposed 1985 Campus Plan. The President Condominium Association endorsed the ANC report and recommendations. The Association called for a five year time frame for the Plan assuming the Board acted to approve the Proposed

Plan and urged the Board to evaluate the Plan's overall effects and cumulative impacts on the neighborhood. The Association expressed concern regarding the Plan's projected increase in enrollment noting a 12 percent increase appears benign, but in reality it adds to an existing saturated condition. To alleviate the impact of proposed University growth, the Association suggested adoption of a stable enrollment policy or use of the investment buildings for educational purposes. The Association further recommended a reduction in on-campus support and administrative space for University educational facilities located in northern Virginia. Finally, the Association stated University traffic impacts extend beyond the peak hours studied by the University's traffic consultant. By subsequent resolution the Board of the President Condominium Association indicated its position as other than a formal opponent in the case. In reconsidering its former resolution, the Board expressed support for the landscape and historic preservation elements of the Proposed Plan.

48. An individual property owner residing within Square 43 noted the location of his and his neighbor's house between a total of eight properties owned by the University in the 2300 block of Virginia Avenue. In the event the Board adopted OP's recommendation regarding Square 43's removal from the campus boundary, the property owner urged the Board not to prohibit University acquitance of his and his neighbors properties assuming they agreed to sell. The property owner agreed with the intent associated with the OP and ANC recommendation to remove the Square. However, he noted the removal would be meaningless and would negatively impact the value of his property unless the Board also compelled the University to return properties it owned within the Square to general residential use.

#### Other Opposition

49. Opponents to the Proposed Plan submitted a petition for the record signed by 833 residents of ANC 2A. Persons signing the petition opposed the Proposed 1985 Campus Plan because of its adverse impacts upon residential uses throughout the Foggy Bottom neighborhood.

50. Several letters of opposition submitted to the record expressed concern about the impact of the Proposed 1985 Campus Plan on the existing fiber of surrounding residential neighborhoods and on the parking and traffic conditions in the area.

#### Support

51. Several property owners within the campus boundary submitted letters of support to the record. The letters generally claimed that ANC 2A failed to report the existence

of local support for the Proposed 1985 Campus Plan. The proponents also felt that the University responded to the ANC's objections and believed that the University provided area residents cultural and educational opportunities of broad dimension.

Board's Findings and Actions Based on the Record

52. The Board concurs in part with the University's assessment concerning the lack of adverse noise impacts. However, for reasons discussed below, the Board finds the need to condition its order relative to the location of future University structures. The Board believes its condition will further minimize potential adverse noise impacts.

53. Setting aside the issue of street closings, an issue which the Board discusses below, the Board concurs in part with the University's traffic assessment. However, for reasons discussed below, the Board finds that a number of transportation-related conditions are necessary to prevent adverse transportation impacts.

54. The Board concurs with the University's assessment of the lack of impacts associated with enrollment. However, for reasons discussed below, the Board finds the need for a condition relative to the location and design of future University structures. This condition minimizes the potential adverse impacts of future structures in campus locations bordering privately owned residential property.

55. The Board concurs with the University's assessment and figures regarding current and proposed FAR, as set forth in Finding numbered 35.

56. Subject to the conditions of this Order, the Board finds compliance with 11 DCMR 210.4 and 507.4.

57. The Board concurs in part with the recommendations and conditions proposed by OP. However, for reasons discussed below, the Board finds it necessary to modify certain of the OP recommendations.

58. The Board concurs with the reasoning and recommendations of DPW as to traffic, street closings, pedestrian bridges, parking, and water and sewer systems.

59. The Board is required by statute to give "great weight" to the issues and concerns raised by ANC 2A and reduced to writing in resolution form. Recognizing the diligence and thoroughness with which the ANC reviewed the Proposed 1985 Campus Plan and formulated its recommendations, the Board, nonetheless, finds itself unable to accept the ANC recommendations in their entirety. In addressing the ANC's

concerns as well as those raised by other opponents of the Plan, the Board finds as follows:

- a. The Board concurs with OP's recommendation concerning the removal of Square 43 and the Concordia Church from the campus boundary. The Board is unwilling, however, to remove St. Mary's Church or the three apartment houses - The West End, the Schenely and the President Condominium - as recommended by the ANC. The Board believes the removal of Square 43 to be essential to the preservation and enhancement of residential uses in the Foggy Bottom neighborhood. The Board also believes the removal of the Concordia Church will not inhibit University development, since Square 121, the Square containing the Concordia Church, is fully developed. However, this is not the case with Square 42, the Square containing St. Mary's Church.
- b. Square 42 contains a significant amount of vacant, University-owned property and thus represents a development opportunity area for the University. While the Board agrees that St. Mary's Church should be protected from potential adverse impacts associated with University development, the Board believes the best approach to be the regulation of the future development. Toward that end, and to ensure a lack of adverse impacts upon other privately-owned properties in and around campus, the Board incorporates as a condition to its Order two policies. These policies require University sensitivity when locating and designing future University structures. The Board further incorporates a condition requiring a showing of compliance with these policies with each subsequent University special exception application processed under the 1985 Plan.
- c. As to the removal of the Schenely, the West End, and the President Condominium, the Board believes the acquisition of these structures to be a matter between a willing buyer and a willing seller and hence outside the Purview of the Board's jurisdiction. The Board believes a better course of action relative to these structures to be a condition limiting future use of these structures to University dormitories. Assuming the University proves successful in their acquisition, such a condition ensures a continued residential presence within campus and addresses the ANC concerns regarding inadequate dormitory space.
- d. Finally, returning to the issue of Square 43, contrary to the OP and ANC recommendation, the Board

declines to impose any additional limitations on the use of University owned property within the Square. The University, like other property owners, must comply with zoning regulations applicable to Square 43, and the Board feels these regulations sufficiently protect private property between and around University-owned parcels in the Square.

- e. The Board commends the University for its candor in enunciating its intent to acquire all property within the campus boundary, and despite the objections raised by the ANC and others, the Board declines to remove this policy from the Plan. The Board finds acquisition of private property to be a private contractual matter between willing buyers and sellers, and thus beyond the Board's jurisdiction. The Board believes, however, this decision contains sufficient safeguards against the complete elimination of all residential uses as evidenced by its discussion above and subsequent findings.
- f. The Board finds reasonable the Plan's proposed increase in enrollment of approximately one percent per year. The Board believes a freeze on enrollment at current levels unduly restricts the University in carrying out its educational mission. Further, the Board believes a more appropriate approach with regards to enrollment is to regulate the potential external effects, i.e. noise, traffic, parking, and location of development, resulting from an enrollment increase. Accordingly, the Board incorporates a number of conditions into its Order designed to ameliorate the external effects associated with additional students.
- g. The Board agrees with OP's recommendation that the University should be permitted to permanently utilize its investment frontage properties for commercial purposes. The Board recognizes this represents a substantial policy change from the previously approved 1970 Campus Plan. Nonetheless, the Board finds persuasive the University's testimony that the income produced by these properties offsets rising tuition costs. Further, as discussed above, the Board does not want to jeopardize the University's educational mission, yet it strikes the Board that any condition compelling the University to convert its commercial buildings to educational use would in fact produce this undesired effect. For similar reasons, the Board rejects OP's recommended prohibition against construction of additional commercial buildings along Pennsylvania Avenue. The Board notes the location of Pennsylvania Avenue in a

commercial district, and feels any restriction against commercial development in a commercial district runs counter to the Zoning Regulations. As regards to the University's activities in a commercial district, the Board desires to treat the University as it would any other property owner.

- h. While the University seeks the widest possible latitude in its use of interim, leased space, the Board finds interim office and administrative leased space rightfully belongs in commercial districts. The Board acknowledges a condition to this effect is less restrictive than that sought by OP and ANC-2A. However, to compel the University to seek leased residential space in commercial districts, an intended effect of OP's recommended condition, places the University at an economic disadvantage. Further the Board finds excluding all University interim leased space from the boundaries of ANC 2A inefficient in that it removes University leased space from physical proximity to the campus. Finally, because the University's use of interim leased space fluctuates annually, the Board finds it appropriate for the University to periodically update interim space needs in conjunction with future applications processed under the 1985 Plan.
- i. As to concerns regarding the Plan's lack of specific information on the University's satellite campus, the Board finds the University's subsequent submission responsive on this issue.
- j. In spite of the controversial nature of the proposed height increase within the campus core, the proposed closing of five campus streets, and the proposed construction of five above-grade pedestrian bridges, the Board, mindful of its jurisdiction, declines to comment on the merits of these issues. The Board notes that before any specific action can be taken with regard to any of these three proposals, the University must submit an individual, detailed application to the appropriate District authority for review and decision. In all instances, be it a PUD and map amendment application to the Zoning Commission for permission to construct a University building in excess of prevailing height requirements; or an application to the Council to close a campus street; or an application to the Zoning Commission under the Air Rights Act to construct a pedestrian bridge, existing procedures provide ample opportunity for citizen review and comment. Further, while the Board acknowledges it lacks jurisdiction over these concepts, the Board nonetheless finds their incorporation in the Proposed Plan

appropriate. Indeed, their inclusion appears mandated by 11 DCMR 210.4 and 507.4. These sub-sections call for submission of a unified campus plan incorporating information on the height of buildings, street improvements and all improvements in general, which would appear to incorporate improvements like pedestrian bridges. Finally, so as to make its position clear to all parties, Board approval of a Plan with references to height increases, street closings, and pedestrian bridges is not to be construed as approval of these concepts or any particular application processed by the University in the future to implement these concepts. The Board merely finds these concepts appropriate topics for incorporation in the University's long range Campus Plan.

- k. The Board concurs with the Office of Planning and others that the University needs to augment its description of proposed development. The Board likewise concurs with OP's recommended early notice system as one mechanism for enhancing the plan's specificity. While the Board finds persuasive the University's testimony regarding the need for flexibility in planning for the location of future development, the Board also finds it appropriate and reasonable for the University to go public with a specific development plan, once locational, programmatic and financing constraints are resolved internally within the University.
- l. Further, the Board finds the overlapping nature of the Educational Mixed Use and Support land-use categories problematic. Given the Plan's generalized description of the location of future development, the Board concurs with OP and ANC 2A that these two land-use categories should be mutually exclusive. Accordingly, the Board finds it appropriate for the phrase "limited educational support functions" to be eliminated from the Educational Mixed Use land use category and the phrase "limited mixed use functions" to be removed from the Support land-use category.
- m. Finally, the Board also finds persuasive the testimony of ANC 2A, DPW, and others regarding the need for additional on-campus University housing. However, the Board finds the means selected by the University to achieve this objective, namely acquisition of three privately owned apartment structures, tenuous at best. If market forces conspire against University acquisition of these three apartment structures, the University in essence is relieved of any obligation under the Plan

to construct on-campus housing. The Board finds this an unacceptable situation. Accordingly, the Board concurs with OP's proposed condition calling for University selection of an on campus University owned site as a priority site for strictly dormitory development.

- n. As to ANC concerns regarding the impact of proposed University development on residential properties, the Board concurs with the ANC on the need for additional safeguards. However, the Board believes that the specific design criteria and constraints proposed by the ANC are inappropriate, because they impose more restrictive requirements on the University than the Zoning Regulations. Nonetheless, to ensure a lack of adverse impacts, the Board finds the need for the incorporation of two additional policies in the Proposed Plan. These policies, incorporated as conditions to the Board's Order, compel the University to locate structures so as to avoid adverse impacts on privately-owned residential properties, especially those on the periphery of the campus, and to design structures with sensitivity to the height and bulk of adjacent non-University owned structures. The Board further finds it necessary to impose upon the University the burden of demonstrating compliance with these policies in conjunction with each future special exception application processed under the 1985 Plan for a specific development proposal.
- o. The Board finds persuasive the testimony of the University's traffic consultant and DPW regarding the sufficiency of 2700 to 3000 parking spaces over the life of the Proposed Plan. The Board also finds University implementation of traffic management and mitigation measures essential to the minimization of traffic volumes and impacts on campus streets. Further, to minimize adverse traffic impacts associated with both University and non-University events sponsored at the Smith Center, Marvin Center and Lisner Auditorium, the Board finds it necessary to impose restrictions upon the distribution of tickets to such events to off campus residents. As regards this latter finding, the Board believes both University and non-University events generate significant amounts of additional traffic. The Board finds from experience the best way to minimize such traffic is to control the distribution of tickets to off campus individuals likely to generate traffic.
- p. The Board finds the University and ANC 2A have reached a stipulated agreement concerning the joint sponsorship of historic landmark applications for

certain specified buildings within the campus boundary. The Board finds this agreement to be controlling on the issue of historic preservation over the life of the Plan.

- q. As to concerns raised regarding streetscape standards, the Board concurs with OP's recommendation calling for the preparation of a detailed, campus-wide, streetscape plan. The Board believes until such time as the University submits such a plan, the Board is unable to render an informed decision on the issue of pylon installation.
- r. The Board finds unpersuasive the arguments of the ANC concerning a five-year time frame for the Proposed 1985 Campus Plan. Further, the Board finds the Georgetown University example cited by the ANC as precedent for a time limitation distinguishable from the facts of this case. The 1983 approved Georgetown University (GU) campus plan applies to a self-contained University campus. Over the five year life of the plan, GU envisioned significant campus development. This development promised to change the campus environment. On the contrary, GWU officials testified to the lack of a unified campus. They further testified to a protracted, five-to-seven year planning and development process which GWU frequently encounters because of land assembly problems. This protracted development process suggests to the Board that GWU's campus environment is likely to remain relatively stable over the next five or more years, thus rendering a five-year time limitation unreasonable.

CONCLUSIONS OF LAW AND OPINION:

Based on the record, the Board concludes that the applicant is seeking the review and approval of its revised campus plan, the granting of which requires compliance with the requirements of Paragraphs 3101.46 and 4101.43 and that the relief requested can be granted as in harmony with the general purpose and intent of the Zoning Regulations and that it will not tend to affect adversely the use of neighboring property. The Board concludes that the applicant has met its burden of proof. The applicant has addressed the issues of noise, traffic, number of students, or other objectionable conditions. The Board concludes that the use as conditioned is so located so as not to become objectionable to neighboring property. In the R-5-C and R-5-D Districts, the total bulk of all buildings and structures on the campus does not exceed the gross floor area prescribed for the R-5-C District. The applicant has submitted a plan for developing the campus as a whole. The Office of Planning and DPW have reported on the Campus Plan. The Board further concludes that the application

can be granted as in harmony with the general purpose and intent of the Zoning Regulations and will not tend to affect adversely the use of neighboring property. The Board concludes that it has accorded to Advisory Neighborhood Commission 2A, the "great weight" to which it is entitled. Accordingly, it is ORDERED that the application is GRANTED subject to the following CONDITIONS:

1. Approval of the Campus Plan shall be for a time period extending to the year 2000 or until such time prior to the year 2000 as the Board or its successor with jurisdiction over campus plans determines conditions warrant submission of an updated plan.
2. The University shall submit a special exception application to the Board for each structure or addition to an existing structure which the University proposes to construct over the life of the Plan. In addition to a demonstration of compliance with applicable provisions of the zoning regulations and the contents of the approved 1985 Campus Plan, each application shall include the following:
  - a. A showing that the use, height, bulk, and design (including the location of any means of approach and egress) of the proposed structure is sensitive to and compatible with adjacent and nearby non-University owned structures and uses;
  - b. An indication of any need for and amount of interim leased space necessary to accommodate activities displaced by construction and/or activities intended to be located permanently in the completed structure; and
  - c. Recomputation of the University's total FAR, copies of which shall be submitted to the Zoning Administrator. Such information shall be broken down by zone District and include the following: existing and occupied FAR; FAR under construction pursuant to Board approval; and FAR upon completion of the proposed structure.
3. The University shall notify the Office of Planning and ANC 2A of its development plans for a specific site following approval of the proposal by appropriate University committees and the University's Board of Trustees and prior to completion of final, detailed plans and specifications.

4. Square 43 and Lot 17 of Square 121 shall be removed from the campus boundary established by the Board in Order No. 10403, and, as amended by the foregoing, the campus boundaries shall be those depicted in Figure 1 of Exhibit 44.
5. Student enrollment over the life of the plan shall not exceed 20,000 students. Faculty and staff shall not exceed 1,550 and 10,023 respectively.
6. Each of the following shall be used only as University dormitories if acquired by the University during the life of the 1985 Campus Plan: The Schenely Apartments (2121 H Street, N.W.; Lot 846, Square 77); The West End Apartments (2124 Eye Street, N.W.; Lot 845, Square 77); and The President Condominium (2141 Eye Street, N.W., Lots 2001 to 2125, Square 75).
7. The University shall designate at least one University owned site within the campus boundary as a preferred development site for University residential use. The University shall also designate at least one University owned site within the campus boundary as an alternative development site for residential use.
8. The University shall incorporate the following land-use policy into the 1985 Campus Plan: University uses and structures (including the location of any means of approach to and egress from the structure) will be located to avoid adverse impacts on non-University properties, especially those residential properties on the periphery of the campus.
9. The University shall incorporate the following design policy into the 1985 Campus Plan: The height, bulk and design (including the location of any means of approach and egress) of future University structures will be compatible with and sensitive to the height, bulk, and design of adjacent non-University-owned structures.
10. The phrase "limited educational support functions" shall be eliminated from the Educational Mixed-Use land-use category.
11. The phrase "limited educational mixed use functions" shall be removed from the Support land-use category.
12. The University shall provide between 2700 and 3000 off-street parking spaces within the campus boundary.

13. The University shall undertake over the life of the plan traffic and parking mitigation measures of the type outlined by the Department of Public Works, and which are set forth in Finding of Fact numbered 40a. of this Order.
14. The University shall notify all affected property owners in a timely manner of the occurrence of a temporary street closing necessary to accommodate University related functions.
15. All off-campus short-term office and administrative interim leased space shall be located in commercial zones.
16. The University shall prepare a detailed streetscape plan applicable to the entire campus. The plan shall include, among other elements, a discussion of the installation of pylons, and it shall be developed in conjunction with the Office of Planning and the Department of Public Works. Upon completion, the plan shall be submitted to the Board for review.
17. Within six months of the date of this Order, the University shall submit a comprehensive management scheme to address traffic and parking which is caused by attendance at events on campus which are attended by a significant number of persons not normally associated with the University and the campus who come to the campus for the specific purpose of attending the event. The management scheme shall include the following:
  - a. Measures to minimize the attendance of such persons, whose attendance would be likely to generate vehicular traffic.
  - b. Measures to schedule events at times which reduce conflicts with other traffic and other demands for parking.
  - c. Measures to discourage travel by private automobile and encourage travel by public transportation.
  - d. Measures to encourage persons who drive to park in commercial parking garages.
  - e. Any other concrete measure to address parking and traffic.
18. Within six months of the date of this Order, the University shall revise Exhibit No. 44 in the record

to reflect changes mandated by the above-stated conditions. The revision shall include a revised map of the campus, with the following specifications: The map shall show the campus boundaries and the number of each square within the boundary, and shall identify the approved uses for each square; the map shall be in black and white only. Upon completion, the revised copy shall be submitted to the Board. The Board shall certify the revised copy as the approved campus plan. Copies of the approved plan shall be maintained in the Office of the Zoning Secretariat and the Office of the Zoning Administrator.

VOTE: 5-0 (Lindsley Williams, Carrie L. Thornhill, Charles R. Norris, Paula L. Jewell, and William F. McIntosh, to GRANT.)

BY ORDER OF THE D.C. BOARD OF ZONING ADJUSTMENT

ATTESTED BY:

  
EDWARD L. CURRY  
Acting Executive Director

FINAL DATE OF ORDER: \_\_\_\_\_

FEB 25 1988

UNDER 11 DCMR 3103.1, "NO DECISION OR ORDER OF THE BOARD SHALL TAKE EFFECT UNTIL TEN DAYS AFTER HAVING BECOME FINAL PURSUANT TO THE SUPPLEMENTAL RULES OF PRACTICE AND PROCEDURE BEFORE THE BOARD OF ZONING ADJUSTMENT."

THIS ORDER OF THE BOARD IS VALID FOR A PERIOD OF SIX MONTHS AFTER THE EFFECTIVE DATE OF THIS ORDER, UNLESS WITHIN SUCH PERIOD AN APPLICATION FOR A BUILDING PERMIT OR CERTIFICATE OF OCCUPANCY IS FILED WITH THE DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS.

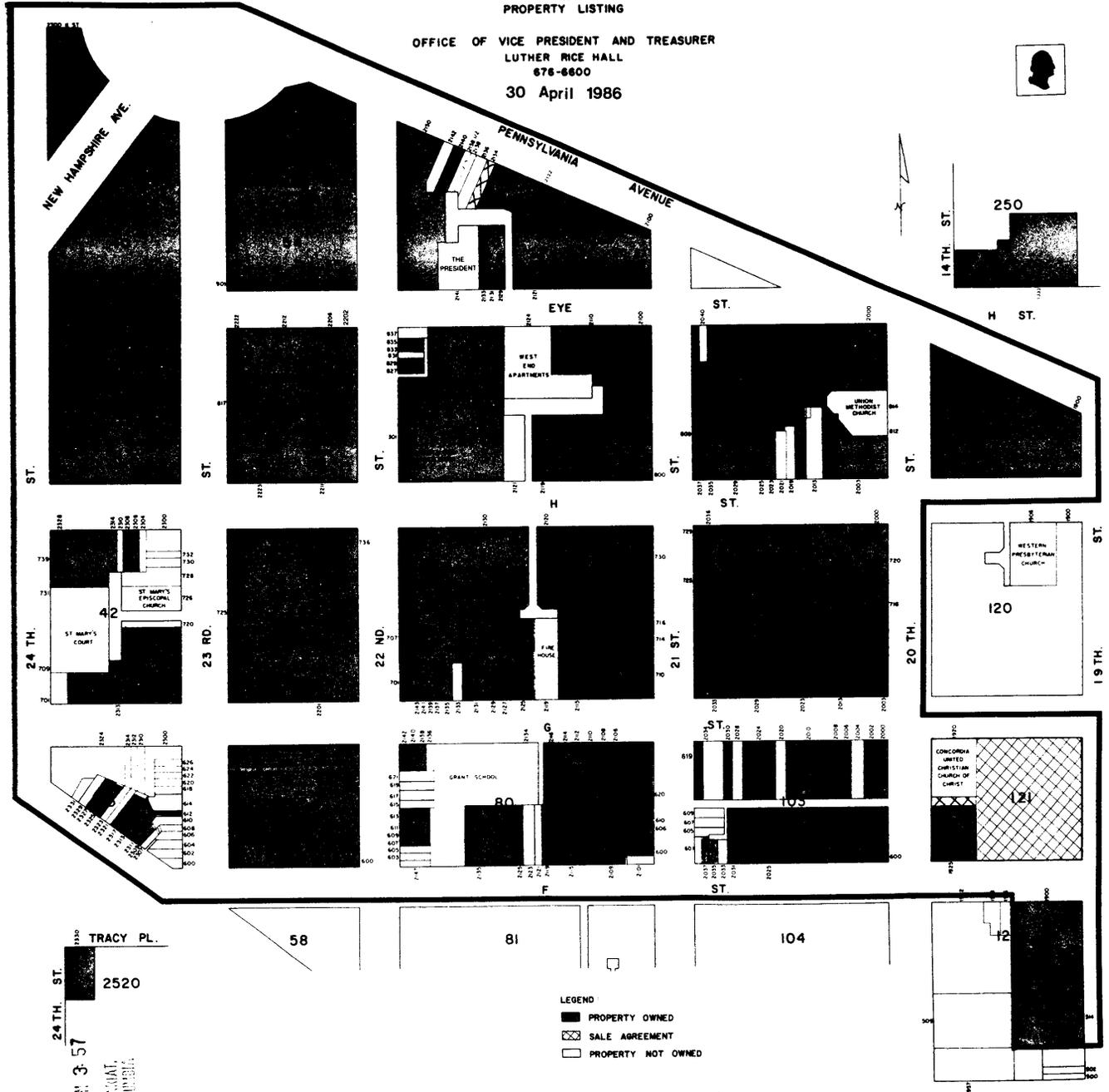
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# THE GEORGE WASHINGTON UNIVERSITY

CAMPUS DEVELOPMENT PLAN BOUNDARIES  
AND  
PROPERTY LISTING

OFFICE OF VICE PRESIDENT AND TREASURER  
LUTHER RICE HALL  
676-6600

30 April 1986



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