



MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Jennifer Steingasser, Deputy Director, Development Review and Historic Preservation

DATE: June 2, 2011

SUBJECT: Case No. **ZC-11-07**: Request for Special Exception approval of a new campus plan for American University, filed by Goulston & Storrs, P.C.

I. SUMMARY RECOMMENDATION

Universities are an important part of the District's intellectual and cultural life. They have the potential to contribute significantly to the local economy and employment. When located within residential zones, the impacts of a university must be evaluated against the standards of the zoning regulations and considered carefully to avoid adverse impacts to the residential communities that surround them. Student housing, student life activities, and academic and administrative operations must be provided and arranged to avoid adverse impacts on surrounding communities, with special attention paid to ensure that the quality of life of existing residential neighborhoods is not diminished. With conditions, the American University campus plan can facilitate the fulfillment of their academic mission and not be objectionable to neighboring property.

The Office of Planning recommends the 2011 Campus Plan be approved with the following conditions:

Noise

1. Reduce and reorient the proposed bleachers at Reeves Field so they do not face the adjacent homes.
2. Install an alternative speaker/sound system at the Williams/Jacobs Recreational Complex fields that would distribute sound more evenly at ground level as opposed to the use of a traditional loud speaker system.
3. Install a sound wall along the western boundary of the William/Jacobs Recreational Complex fields with additional landscaping provided to buffer the view of the wall from the adjoining residential properties.
4. Work with the adjacent neighbors to create an enforcement policy that clearly articulates the types of activities that are subject to its conditions and identify an AU contact person that is directly accountable for their enforcement.

Number of Students

5. Accept the overall total student caps and clarify that it include all undergraduate, graduate and law students, and any student taking at least one class or course at any of the campuses covered by the Campus Plan.
6. Hold the graduate student enrollment constant with the fall 2010 figures until additional information is provided and accepted by the Zoning Commission regarding the anticipated growth and use of graduate programs.
7. Cap the law student enrollment at the University stated expectation of 2000 students.

Student Housing

8. Maintain the existing percentage of university-provided student housing at 67% of the total undergraduate enrollment.
9. Reduce the unit count on the East Campus to 400 student housing beds.
10. Locate additional housing on the Main Campus as needed.



East Campus

11. Provide a 65 foot landscape buffer along the eastern property line adjacent to Westover Place.
12. Permit non-residential buildings at 2 and 3 stories within the next 40 feet and locate residential uses no closer than 100 feet to the eastern property line adjacent to Westover Place.
13. Limit retail uses to the 3,020 square feet proposed within the Visitor Center (Building 5).
14. Submit a comprehensive retail plan as an amendment to the Campus Plan that identifies the type of retail proposed and how it is integral to the campus use and not in conflict with the Comprehensive Plan.

II. APPLICATION IN BRIEF

Location: 4400 Massachusetts Avenue NW – Main Campus
3501 Nebraska Avenue NW – East Campus
4300 Nebraska Avenue NW and 4344 Wisconsin Avenue NW – Tenley Campus

Legal Description: Square 1560, Lot 807;
Square 1599, Lots 24 and 812;
Square 1600, Lots 1, 801, 810, and 816;
Square 1601, Lot 3; and
Square 1728, Lot 1

Ward/ ANC: 3D, 3E; Tenley Campus is adjacent to ANC 3F

Applicant: American University (AU)

Zoning: Main Campus: D/R-5-A and R-1-B (west of Massachusetts Avenue)
East Campus: R-5-A and R-5-B (Massachusetts Avenue frontage)
Tenley Campus: R-1-B

Acreage: Main Campus: 76 acres (including the East Campus)
Tenley Campus: 8 acres

Proposal: Application of the American University, pursuant to 11 DCMR 3104.2, for a special exception and further processing of the campus plan of the American University's Main Campus and Tenley Campus (years 2011-2020). In addition to updating the campus plan, American University is also seeking further processing for three projects: 1) six new buildings on the East Campus; 2) an addition to Nebraska Hall; and 3) an addition to the Mary Graydon Center.

Relief: Special exception approval pursuant to 11 DCMR § 210, Colleges and Universities

III. SITE DESCRIPTION

Main Campus

The Main Campus, located at the convergence of Ward Circle, Massachusetts Ave, and Nebraska Avenue, includes three separate subareas. The “traditional campus,” where most of the university facilities are located, is a 59-acre area generally bounded by Massachusetts Avenue on the north, Nebraska Avenue on the east, Rockwood Parkway and residential development on the south, and University Avenue and residential development on the west. An adjacent property to the north is owned and occupied by Wesley Theological Seminary. Forty-three buildings, containing over 1.7 million square feet of floor area, accommodate residence halls, athletic facilities, academic buildings, and student activity space on the main campus. A central quad, flanked by primary academic buildings, provides a formal interior open space; with residence halls located further north and south. Several new projects are being proposed for the main campus over the next 10 years including new campus housing, expanded athletic and student activity facilities, and a revised internal circulation plan.



The area referred to as the East Campus is a second sub-area of the Main Campus, located at its eastern edge (and shown in a hatch pattern on the adjacent map). This 8-acre area is bounded by Nebraska Avenue on the west, New Mexico Avenue on the south, and Massachusetts Avenue and Ward Circle on the east and north. The Westover Place residential community is located to the immediate east. Other nearby uses include the Department of Homeland Security across Massachusetts Ave. to the north, Metropolitan Memorial United Methodist Church, Embassy Park residential community, Horace Mann Park, and a commercial area to the south on New Mexico Avenue. The East Campus is currently being used as a parking lot with approximately 900 parking spaces. Six new buildings, which would contain a mix of residential and administrative uses, are being proposed for this area as part of AU’s current further processing request.

Finally, the third subarea of the Main Campus is a narrow, L-shaped property located on the west side of Massachusetts Avenue. This part of the campus is improved with the Katzen Arts Center, Nebraska Hall residential building, and a surface parking lot, accessed from Nebraska Avenue. The Ft. Gaines residential community is located to the immediate north of these buildings. Temple Baptist Church abuts the property to the east along Nebraska. A 150-bed addition to Nebraska Hall is proposed for further processing as well.

Tenley Campus

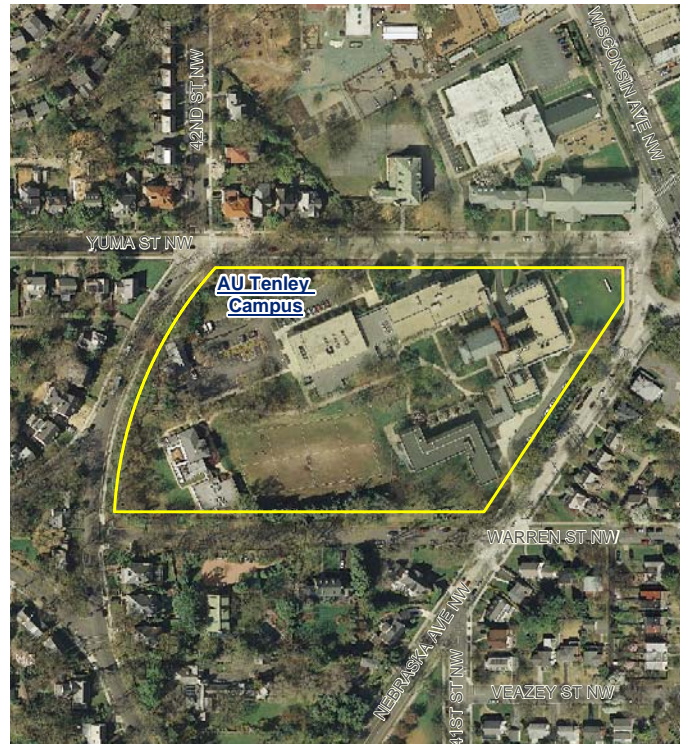
The Tenley Campus is an eight acre site that is bounded by Nebraska Avenue on the east, Warren Street on the south, 42nd Street on the west and Yuma Street, N.W. on the north. This portion of the campus is improved with five main buildings. These structures comprise the former Immaculata School, purchased by AU in 1985 and subsequently adapted for University needs. The entire campus was nominated for designation as a historic district by the Tenleytown Historical Society in 2011, including Capital Hall. A historic landmark application was separately filed for Dunblane Hall. These applications are currently pending review by the Historic Preservation Review Board.

Current use of the Tenley Campus consists of residence halls with approximately 487 beds, a service building, surface parking lots, and open space. The northeastern corner of the Tenley campus adjoins Tenley Circle and single-family detached houses border the Tenley Campus on all four facing streets. The Tenley Campus is located one block south of the Tenleytown/American University Metrorail Station on the Red Line, with entrances at Wisconsin Avenue and Albemarle Street.

Other University Controlled Properties

American University also owns several other properties in the vicinity which are not the subject of this request. These include the Washington College of Law site, located north of the main campus in a former office building at 4801 Massachusetts Ave N. Other office and retail space locations include 3201 New Mexico Avenue NW and 4200, 4228, and 4620 Wisconsin Avenue NW. University uses in these commercially zoned buildings are allowed as a matter-of-right under the existing Zoning

Regulations. Finally, AU owns residential property located at 4621-33 Rockwood Parkway NW, located within the D/R-1-B zone.



IV. AREA DESCRIPTION

The Main Campus is bounded by the residential neighborhoods of Spring Valley, American University Park, Ft. Gaines, Wesley Heights, and Westover Place. These areas are comprised of predominantly single-family detached and rowhouse structures, on a variety of lot sizes, shapes, and street types. Many lots in the area lack alley access and the block types range from a suburban, curvilinear layout to a more typical rectangular shape with rear garages and alleys. Most homes are two to three stories in height.

Commercial uses are located nearby AU's Main and Tenley campuses as well. The Foxhall Square and Sutton Center commercial buildings are located south of the East Campus on New Mexico Avenue and the Tenley Campus is located adjacent to the Wisconsin Avenue commercial corridor, with a variety of shops and restaurants located to the north near the Metro Station. Other institutional uses abut the American University campus, including religious institutions, schools, and embassies on Nebraska, Massachusetts, and Wisconsin Avenues. Finally, the Department of Homeland Security Nebraska Campus is located just east of the campus at Massachusetts and Nebraska Avenue, which is expected to significantly increase in size in the near future

V. 2000 CAMPUS PLAN

The previous campus plan (approved per ZC Order 949) expires on August 15, 2011. The 2000 Plan proposed:

- An enrollment cap of 10,600 students and 2,200 employees;
- The provision of on-campus housing sufficient to accommodate 85% of all full-time freshman and sophomore students and 2/3 of all full-time undergraduates;
- 10 development projects, comprising up to 400,000 square feet of gross floor area, including the new School of International Service building;
- Implementation of a Neighborhood Action Program to address off-campus student conduct;
- Adoption of a campus lighting plan;

- Landscape improvements; and
- Guidelines for the number and type of special events permitted on the athletic facilities on the western edge of the campus.

In addition, three further processing applications were approved along with the 2000 Campus Plan. These included the Katzen Arts Center (completed), an addition to the Mary Graydon Center, and a driveway under Butler Pavilion. Many of the development projects anticipated and approved under the 2000 Campus Plan have not been completed. A summary of the previously approved projects and their current status is provided in Appendix A.

VI. 2011 CAMPUS PLAN PROPOSAL

The American University 2011 Campus Plan provides for over 900,000 square feet of campus development projects over the next 10 years, nearly half of which is devoted to new or expanded student housing facilities. As indicated above, several projects are being carried over from the 2000 Campus Plan. AU anticipates steady growth among its undergraduate population and moderate increases in the number of graduate students during this time frame. As such, the proposed campus plan also includes a new law school facility on the Tenley Campus, updated athletic facilities, and expanded student life buildings.

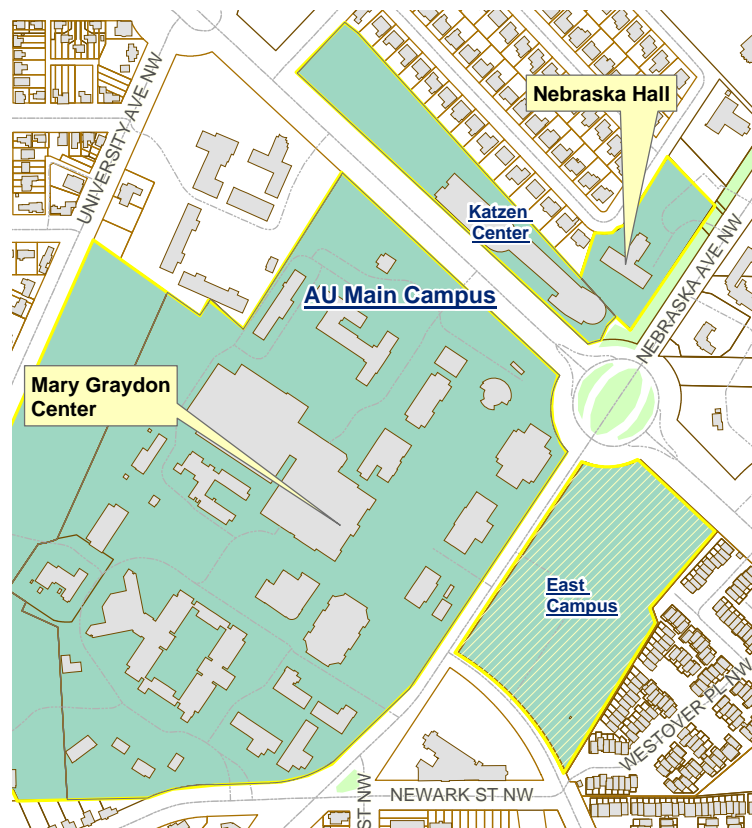
A summary of the projects being considered as part of the 2011 Campus Plan, including those being brought forth for further processing, can be found in a table attached as Appendix B. Projects that will be the subject of further processing requests in the near future are highlighted in blue. The further processing requests are described in greater detail below.

Mary Graydon Center Addition

This project was initially proposed and approved as part of the 2000 Campus Plan and the project scope has not changed. The proposed project would add 20,000 square feet of activity space to the Mary Graydon Center, an existing student life building located adjacent to the central quad, in the center of the Main Campus. The project site is surrounded on all sides by university uses and the addition would be located along the west face of the existing building. The project would add office and support space, expanded and enhanced dining facilities, and additional meeting and event spaces. The proposed 3-story addition would be 40' in height. The building would appear to be a glass and metal structure; however the further processing application provides little additional detail about its proposed appearance.

Nebraska Hall Addition

This project was also initially proposed and approved as part of the 2000 Campus Plan. Nebraska Hall is an existing 115-bed residence hall located immediately northwest of Ward Circle along Nebraska Avenue NW, adjacent to the Katzen Arts Center. Vehicular access to the site, provided via a circular driveway from Nebraska Avenue, would

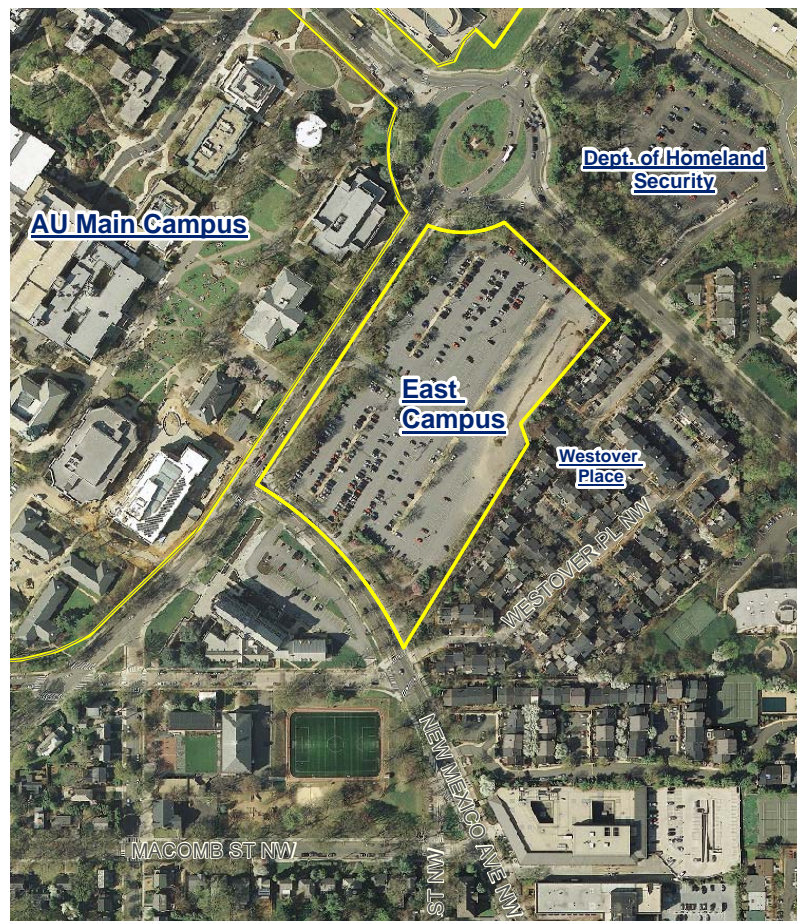


remain in its current location. The site contains a surface parking lot with 26 spaces which would be eliminated as part of this proposal. Low density residential uses are to the north, including the Ft. Gaines community, comprised mainly of single-family detached homes, separated from the site by 44th Street NW. Temple Baptist Church is located immediately northeast of the site, and the Department of Homeland Security Nebraska Avenue complex is located across the street on the eastern side of Nebraska Avenue. The site has several changes in grade but generally slopes downward to the east.

The new apartment-style units would be primarily for upperclassmen (juniors and seniors) and include kitchens in each residential suite, which would contain 3-4 beds. The three-story, 50,000 square foot addition would extend the building to the northeast. The building would maintain a 97' setback from Nebraska Avenue, similar to the 104' setback for the existing building, and a 45' setback from the rear property line adjacent to 44th Street. 44th Street has a right-of-way width of 60 feet thereby creating a minimum separation distance between the new addition and the residential community of 105 feet. The three-story building would include a central multi-function space on the main level and study lounges on each level. New landscaping features, including evergreen and deciduous trees, and a new 7' high fence would buffer the site from adjacent residential uses. The building has been designed to take advantage of the change in grade on site and provides a partial below-grade level, which allowed for an increase in the number of residential units, within the same building footprint, than initially proposed.

East Campus

As described in Table 2, the proposed East Campus development would consist of six new buildings, containing over 260,000 square feet of academic, residential, and retail space. The site is proposed to have three residence halls (Buildings 1-3), *proposed* to be 5-6 stories in height and containing 590 units, located near the center of the site and along Nebraska Avenue. Academic and administrative offices would be located in two, 2-story buildings (Buildings 4 and 6) and a new welcome center would be located at the corner of New Mexico and Nebraska Avenues (Building 5). Retail uses, proposed for Buildings 1, 2, and 5, would be located along the site's west and south boundary, adjacent to Nebraska and New Mexico Avenues. A portion of the existing surface parking lot would be maintained along the east edge of the site adjacent to Massachusetts Ave. This portion of the site would provide overflow and student commuter parking for the term of the campus plan. The proposed development would have a landscaped buffer a minimum of 40' wide along its eastern border as well as interior courtyards, walkways, and green spaces throughout the site.



VII. CAMPUS PLAN REVIEW STANDARDS

The relevant standards for reviewing campus plans are found in subsection 210 of the Zoning Regulation. An analysis of the campus plan elements and projects against the 210 criteria is provided below. Unless specified, the analysis refers to the entire campus and all of its development projects as a whole. A discussion of the further processing requests is summarized at the end, and in some cases, separated out to address specific impacts of certain project features.

210 COLLEGES AND UNIVERSITIES (R-1)

- 210.1 *Use as a college or university that 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, shall be permitted as a special exception in an R-1 District if approved by the Zoning Commission under § 3104, subject to the provisions of this section.*

The subject application is a request for special exception approval of the 2011 Campus Plan for American University. The university is located within several R districts, as described below.

Main Campus: D/R-5-A, R-5-A, and R-5-B
Tenley Campus: R-1-B

Section 3104 authorizes the granting of special exceptions, as provided in the Zoning Regulations, where, in the judgment of the Board of Zoning Adjustment or Zoning Commission, “*the special exceptions will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps and will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Map subject in each case to the special conditions specified in this title,...*”

The R-1-B District is “designed to protect quiet residential areas now developed with one-family detached dwellings and adjoining vacant areas likely to be developed for those purposes” and the Zoning Regulations for this zone are “intended to stabilize the residential areas and to promote a suitable environment for family life. For that reason, only a few additional and compatible uses shall be permitted”.

The R-5 is a General Residence Zone “designed to permit flexibility of design by permitting in a single district... all types of urban residential development if they conform to the height, density, and area requirements.... The R-5 Districts shall also permit the construction of those institutional and semi-public buildings that would be compatible with adjoining residential uses and that are excluded from the more restrictive Residence Districts”. R-5-B zones specifically permit buildings of a moderate height and density.

Finally, the D, or the Mixed Use Diplomatic Overlay District, was established to implement the Foreign Missions Act and generally highlights embassy and/or chancery sites.

- 210.2 *Use as a college or university shall be located so that it is not likely to become objectionable to neighboring property because of noise, traffic, number of students, or other objectionable conditions.*

Noise – Overall Campus

The proposed 2011 Campus Plan includes several projects that would expand existing academic, athletic, or student life facilities on the Main Campus. As these new buildings and facilities would be located at the campus’ core and be shielded from its neighbors by existing buildings and landscape features, OP does not anticipate they will become objectionable to adjacent properties with regard to noise. The

proposed relocation of the Washington College of Law to the Tenley Campus would bring graduate and professional level academic and administrative uses to a site currently being used for student housing and other academic functions. As such, this shift should also not create any objectionable noise impacts. While the bulk of the development would occur in the interior of the campus, certain elements of the campus plan could be improved to lessen their potential noise impact.

One of the proposed development projects is the installation of new bleacher seating for up to 2,000 additional attendees adjacent to Reeves Field. This field, which already has bleacher seating, is located at the western boundary of the campus, adjacent to a single-family detached residential community. The proposed bleachers would be located on the east side of the field, such that noise would be directed to the west where adjacent development is single family detached homes. AU cites an existing campus plan condition that was designed to mitigate noise associated with athletic events and activities held on an adjacent field. A continuation of these conditions to monitor usage of these fields would certainly help manage its impact with regard to noise, but the potential for objectionable conditions persists, as has been articulated by existing residents. Further, adjacent neighbors have indicated that while the current campus plan condition addresses the usage of the field for large, special events, it is unclear if the policy is applicable to more regular usage of the field for small athletic tournaments and informal games, which also include usage of the loudspeaker system and attract crowds. The location and size of the proposed additional bleachers, when combined with the use of the existing playing fields to the south, is likely to create an objectionable condition for the neighbors to the immediate west.

To mitigate noise impacts associated with the usage of athletic facilities, OP recommends the following sound attenuation actions:

1. Reduce and reorient the proposed bleachers at Reeves Field so they do not face the adjacent homes.
2. Install an alternative speaker/sound system at the Williams/Jacobs Recreational Complex fields that would distribute sound more evenly at ground level as opposed to the use of a traditional loud speaker system.
3. Install a sound wall along the western boundary of the William/Jacobs Recreational Complex fields with additional landscaping provided to buffer the view of the wall from the adjoining residential properties.
4. Work with the adjacent neighbors to create an enforcement policy that clearly articulates the types of activities that are subject to its conditions and identify an AU contact person that is directly accountable for their enforcement.

Noise -East Campus

The proposed development would significantly increase the intensity of the use of the East Campus property, which could potentially create objectionable conditions for neighboring uses with regard to noise. AU has made some improvements to manage its noise impact on adjacent residential areas. The academic and administrative uses would be located closest to the adjacent single family residential community. These academic and administrative facilities would be two stories in height and mechanical equipment would not be located on the roofs of these buildings. Student housing and retail facilities, in 4-6 story buildings, are proposed to be located closer to Nebraska Avenue. AU has also agreed to prohibit freshman from living in student housing provided on the East Campus

Despite this, the communities surrounding the university, especially Westover Place, are concerned about the potential noise impact of having 590 residential units adjacent to their west property line. OP recommends that AU explore the use of inoperable windows as a noise mitigation measure. OP also recommends shifting the residential buildings further from the neighboring residences to help mitigate potential noise impacts.

Traffic, Parking, & Circulation

American University is located adjacent to major arterial and connector streets which carry significant amounts of vehicular commuter traffic. The campus is also well served by public transit, including the Tenleytown Metrorail station at Wisconsin and Albemarle Streets NW, several Metrobus lines, and a university shuttle bus system. The campus has several locations for bicycle parking as well as a Capital Bikeshare station on Massachusetts Avenue, adjacent to the Main Campus.

Proposed changes include a revised circulation pattern through the main campus to accommodate the Butler Tunnel enclosure, increased pedestrian activity on the East and Tenley Campuses, as well as a reduction in the supply of off-street parking spaces on campus. The proposed change to internal circulation patterns would shift east-west vehicular traffic, which currently runs through the center of campus, to the north, along existing internal roadways that are adjacent to athletic facilities and fields. With regard to off-street parking supply, approximately 26 spaces would be removed from the Nebraska Avenue surface lot to accommodate the proposed residential addition and over 500 spaces would be eliminated at the East Campus. The proposed East Campus redevelopment would retain a portion of the existing surface parking lot, which would accommodate 250 spaces, and create an underground parking facility for 150 cars. AU, in response to concerns raised about pedestrian safety, has also proposed to locate a new, mid-block pedestrian crossing on Nebraska Avenue next to the vehicular entrance/exit. OP will defer to DDOT on the appropriateness of this solution.

AU proposes several specific measures to manage transportation demand. These include the development of new Capital Bikeshare stations and the provision of 310 new bicycle parking spaces. AU also suggests several long- and short-term improvements that would help minimize pedestrian/vehicular conflicts and manage the impact of vehicular commuter traffic campus-wide.

DDOT will provide a detailed analysis of recommendations for the traffic, parking, and circulation impacts associated with the 2011 AU Campus Plan. However, OP is supportive of AU’s efforts to develop a transportation demand management plan and increase access to alternative forms of transit for students, faculty, and visitors on campus.

Number of Students & Faculty

American University proposes a 13,600 enrollment cap, which, unlike the cap in the 2000 Campus Plan, would include the Law School population. This figure would reflect a true “headcount” and include all students who are enrolled at the Campus, regardless of the number or type of credits they are taking. The 13,600 cap would be a 12.7% increase in student enrollment beyond current levels, if the Law School is included in the headcount. To account for the projected increase, American University anticipates a 1.3% rate of growth among undergraduates, more substantial gains in graduate enrollment (+1000), and an additional 230 Law School students over the next 10 years. AU also proposes a cap for faculty and staff of 2,900, representing an increase of 6.2% over current levels. Tables 3 and 4 illustrate past, present, and projected conditions with regard to student enrollment and faculty and staff levels.

Table 1 – Comparison of Existing and Projected Enrollment

	Existing	Projected	Change (%)
Undergraduate Students	6318	6,400	1.3
Graduate Students	3230	4,400	36.2
WCL Students	1770	2,000	12.9
Other	750	800	6.7
TOTAL	12,068	13,600	12.7
Faculty & Staff	2729	2900	6.2

OP is supportive of a clear and consistent counting method to effectively measure the university's growth and assess its related impacts. The headcount method would capture all undergraduate, graduate, law school, continuing education, or any other students enrolled in an AU program who utilizes facilities on any of its campuses. The same rationale would apply to counting faculty and staff. In light of the proposed relocation of the Washington College of Law to the Tenley Campus and the off-campus holdings in commercial zones, this method would limit significant fluctuations in enrollment and staff numbers when and if off-campus properties are repurposed with academic functions. To be clear, if a student, staff person, or faculty member spends any class time on any campus facility, they would be included in the headcount, regardless of where they live or work.

AU suggests undergraduate enrollment would have a relatively flat rate of growth, which would not appear to, on its face, create adverse impacts. However, AU suggests graduate enrollment would increase by over 36% with little explanation of the nature of the proposed change. Additional information is necessary and has been requested to understand the projected growth in graduate enrollment, if is targeted to a particular field of study, and if the current academic facilities are sufficient to accommodate it. The anticipated enrollment for the Law School is expected to increase at a rate commensurate with that expected for the university overall. As such, the proposed Washington College of Law building proposed for the Tenley Campus is being designed to accommodate this anticipated growth.

OP recommends that the overall total student, undergraduate and law student caps be adopted, but the graduate student enrollment remain constant with the fall 2010 figures until additional information is provided and accepted by the Zoning Commission regarding the anticipated growth and use of graduate programs

Student Housing – Overall Campus

In the fall of 2010, American University had a design capacity of approximately 3,549 student housing beds on campus. An additional 460 beds were available via the use of triples, private leases in the Berkshire apartment building, and off-site housing in other parts of the city. The 2011 Campus Plan calls for an additional 1,300 units of student housing, to be provided primarily on the Main Campus. In order to accomplish this, AU proposes the creation of a student housing enclave on the East Campus, which would only be available to upperclassmen students. AU requests modification of an existing campus plan requirement for student housing. Instead of providing housing sufficient for 85% of freshman and sophomores and 2/3 of all undergraduates, AU proposes to create housing opportunities that would accommodate 100% of its freshman and sophomores and **55%** of all undergraduate students. AU cites the availability of off-campus apartments, relatively low levels of student infractions in off-campus housings, and a resistance to new residential projects by adjacent neighbors as the primary factors motivating this modification. The proposed goal of 4,300 on-campus beds would allow AU to comply with their modified proposal.

The following table illustrates the difference in the amount of student housing that would be required under the existing and modified scenario.

Table 2 – Analysis of Current and Proposed Student Housing Requirements

	Number of Students	2000 Campus Plan Requirement - # of beds		2011 Campus Plan Proposed Modification - # of beds	
Freshman and Sophomores	3207	85%	2726	100%	3207
Undergraduates	6318	67%	4612	55%	3475

A comparison of major universities in the District of Columbia indicates that American University currently houses a comparable percentage of undergraduates on campus or in campus housing to other universities in the District of Columbia but reducing that figure to 55% would place AU second from the bottom in providing university housing.

Table 3 – Comparison of University-Supplied Student Housing in the District of Columbia

University	Percent Housed
American	63% of all undergraduates
Gallaudet	85 % undergraduates & graduates (est)
George Washington	73% of all undergraduates 100% of Freshman & Sophomores
Georgetown	76 % of all undergraduates 100% of Freshman & Sophomores
Howard	59% of all undergraduates 98% of Freshman
George Washington- Mt. Vernon	46% of all undergraduates

However, the standard for zoning approval is not one of comparative percentage to other universities but one of adverse impact and objectionable conditions on neighboring properties. As a result, OP cannot support the requested modification without additional justification and analysis in light of its potential adverse impact on the neighborhood. To this end, OP is compiling data internally and has asked for information from the university with regard to the number of student infractions and police calls in the vicinity. OP anticipates this information will be available at the public hearing.

Therefore OP recommends, at a minimum, maintaining the existing percentage of university provided student housing at 67% of the undergraduate enrollment. OP also encourages AU to continue to identify sites appropriate for student housing on the Main Campus, in locations that are sufficiently buffered from neighboring low density residential areas.

The East Campus housing proposal is specifically discussed with separate recommendations below.

Student Housing – East Campus

The East Campus, while technically a part of the Main Campus, is a large site physically separated from university activities by Nebraska Avenue, a 100' wide right of way. The East Campus is 8 acres in size, which comprises approximately 9.5% of the land area of the university. This project would create student housing for 590 students on the East Campus, or approximately 13.7% of the total supply of the university's campus wide goal of 4,300 student beds.

Student housing, in and of itself, is not an objectionable land use for the site. The R-5-A and R-5-B zones permit a variety of residential and institutional uses, so long as they "would be compatible with adjoining residential uses". While the residential buildings are proposed to be located closer to the main campus along Nebraska Avenue, the number of students on this site has the potential to create objectionable conditions for neighboring properties, given their low-density character. In addition, the 590 units proposed on the East Campus would be in buildings from 5-6 stories in height as compared to the adjacent 3-story single-family residences.

The Comprehensive Plan categorizes the adjacent residential community as a Neighborhood Conservation Area, which calls for modest changes in scale and density as a result of infill development and maintenance of the existing scale and architectural character.

OP recommends reducing the number of beds on the East Campus to a maximum of 400, reducing its percentage of the existing student housing inventory to 9.9. This would bring the ratio of student housing beds to land area on the East Campus to a level commensurate with its relationship to the larger campus. A reduction of 190 beds could be accomplished in a number of ways on the site, either by eliminating floors or portions of buildings, which would also allow for modifications to the site plan that could help manage its impacts on the adjacent residential community to the east.

OP would like to encourage a balanced distribution of student housing campus wide, whenever possible. However, the creation of additional student housing beds at the core of the Main Campus, which would raise the ratio of beds to land area in excess of the levels suggested for the East Campus, would be appropriate in that location and context. Also, the proposed Nebraska Avenue addition, also recommended for approval here, would result in the provision of 6.1% of the university's anticipated student housing inventory on a site that holds only 2.7% of the campus' land area. However, Nebraska Hall is a single residential building on a lot separated from the Main Campus and, to a large extent, the adjacent residential community, by a public right of way. This site is currently improved with residential uses at a height and scale similar to that of adjacent residential buildings. This site is also at a lower elevation than its neighboring residential uses, providing a natural buffer. Finally, the increased residential density being supported at Nebraska Hall, while in excess of that found elsewhere on campus, is not comparable to the scale and impact which would result if it were allowed on an 8-acre site directly abutting a low-density residential community.

While OP supports the university's desire to house more undergraduate students on campus, the amount and location of the student housing proposed for the East Campus would not be compatible with that of neighboring properties or the guidance found within Comprehensive Plan to protect the character of these areas. OP maintains that if substantial amounts of new student housing facilities are created, they would be more appropriately located near the center of campus than along its edges.

Other Objectionable Conditions

Residential Buffers

AU has suggested a minimum 40' wide landscaped buffer between the property line and new buildings on the East Campus. OP suggests the landscaped buffer be widened to a minimum of 65' from the property line to be consistent with the distances between university buildings and adjacent residential uses elsewhere on campus. Nebraska Hall is currently located between 60-145 feet from the closest residential buildings to the north. This distance includes a rear yard setback of at least 35' and, for a large portion of the site, a 60' right of way. At the request of the Ft. Gaines neighbors, the proposed Nebraska Avenue addition will have a minimum rear yard of 45', resulting in a distance of at least 105' between the new building and the property line of the nearest residence. The closest homes to the East Campus site are those in the Westover Place community, which are located 20-50' from the west property line. The suggested 65' buffer, combined with locating the academic and administrative buildings along this edge of site, would ensure that the proposed residence halls would be located at least 125' from the existing residences. OP recommends that this buffer area be similarly landscaped with evergreen and deciduous trees and fenced off to disallow its recreational use by the students.

Design

The campus plan would create new student housing facilities in three locations, at a proposed North and South Hall and on the East Campus. The North Hall building, planned to be 6 stories in height, would be located along the Massachusetts Avenue border, near the President's Building. While OP finds this

location suitable for additional student housing, we would encourage AU to study further how existing site topography can be utilized to either lower the building height or mitigate its appearance from Massachusetts Avenue. OP would be happy to work with the applicant on potential design issues at the further processing stage.

The proposed design of the Tenley Campus buildings are still in process. While OP has no objection to the proposed land use for the site, we would encourage AU to continue to work with the Historic Preservation Office to ensure that new buildings are respectful of the site's history, the contributing structures that will remain, and its relationship to adjacent residential uses and neighborhood character. OP is confident that the proposed building program needs can be met on the site in a manner that achieves these goals. Once additional details about the site's development are known, OP may supplement the record with further project analysis.

OP has requested additional information for all three further processing projects with regard to their design, building materials, and relationship to nearby structures. This would include dimensioned drawings that better illustrate the building's appearance, height, proposed footprint, and overall visual impact. In the future, OP encourages AU to submit more detailed submissions for further processing projects so that we have adequate time to fully assess these projects prior to public hearing.

- 210.3 *In R-1, R-2, R-3, R-4, R-5-A, and R-5-B Districts, the maximum bulk requirements normally applicable in the districts may be increased for specific buildings or structures; provided, that 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 Residence Districts, similar bulk increases may also be permitted; provided, that the total bulk of all buildings and structures on the campus shall not exceed the gross floor area prescribed for the R-5-D District. Because of permissive increases as applicable to normal bulk requirements in the low-density districts regulated by this title, it is the intent of this subsection to prevent unreasonable campus expansion into improved low-density districts.*

The application proposes a campus-wide FAR of 0.8, less than the maximum 1.80 permitted.

- 210.4 *As a prerequisite to requesting a special exception for each college or university use, the applicant shall have submitted to the Commission for its approval 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 the following:*
- (a) Buildings and parking and loading facilities;*
 - (b) Screening, signs, streets, and public utility facilities;*
 - (c) Athletic and other recreational facilities; and*
 - (d) A description of all activities conducted or to be conducted on the campus, and of the capacity of all present and proposed campus development.*

The applicant has submitted plans, found in Exhibits 10 through 21 of their initial application, later amended in their May 20 pre-hearing statement, which propose the following:

- Academic/ administrative: 398, 910 GSF
- Campus life/athletic facilities: 112,000 GSF
- Residential: 436,550 GSF
- Retail Uses: 17,020 GSF

- 210.5 *Within a reasonable distance of the college or university campus, and subject to compliance with § 210.2, the Commission may also permit the interim use of land or improved property with any use that the Commission may determine is a proper college or university function.*

No interim use of land is proposed.

- 210.6 *When a major new building that has been proposed in a campus plan is instead moved off-campus, the previously designated site shall not be designated for, or devoted to, a different major new building unless the Commission has approved an amendment to the campus plan applicable to the site; provided, that for this purpose a major new building is defined as one specifically identified in the campus plan.*

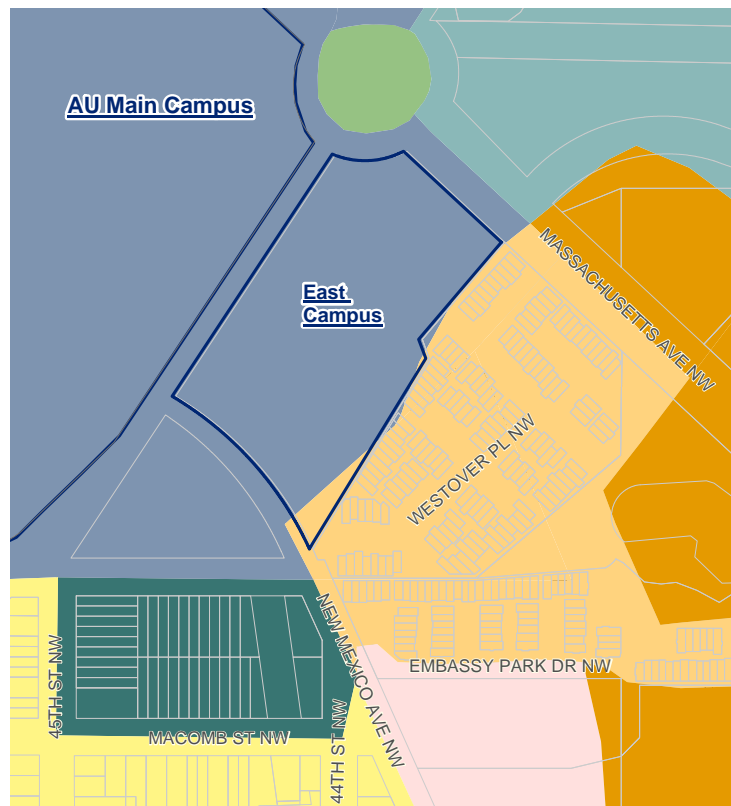
No major new building is proposed to be moved off-campus.

- 210.7 *In reviewing and deciding a campus plan application or new building construction pursuant to a campus plan, the Commission shall consider, to the extent they are relevant, the policies of the District Elements of the Comprehensive Plan.*

Relevant policies of the Comprehensive Plan are listed in Section VIII. Overall, most features of the proposed campus plan are not inconsistent with many policies and objectives of the Comprehensive Plan. However, the campus plan contains some elements, including the proposed location and amount of retail, siting of outdoor athletic facilities, and amount of student housing in proximity to existing low density residential areas, that are inconsistent with policies of the Comprehensive Plan. These include minimizing its impact on surrounding residential communities, expanding outdoor university facilities in a manner without creating adverse impacts, and supporting neighborhood conservation.

Retail uses have been accepted as part of campus plans as customarily accessory uses to a university operation. However, there is insufficient detail to understand the retail program proposed for the East Campus which has increased to 17,020 square feet in the pre-hearing statement. The Comprehensive Plan Generalized land use map identifies a retail center on New Mexico Avenue and the site is appropriately zoned C-1 local commercial which accommodates retail uses. This commercial center has been an important part of the larger neighborhood, with past retail, grocery, and restaurant uses.

OP encourages the University to consider concentrating retail uses in the existing commercial center and recommends that the retail on the East campus be limited to the 3,020 square feet proposed for the Visitor Center until a comprehensive retail strategy is submitted and approved by the Zoning Commission as a part of the Campus Plan.



2006 Comprehensive Plan Future Land Use Map

- 210.8 *As an integral part of the application requesting approval of new building construction pursuant to a campus plan, the college or university shall certify and document that the proposed building or amendment is within the floor area ratio (FAR) limit for the campus as a whole, based upon the*

computation included in the most recently approved campus plan and the FARs of any other buildings constructed or demolished since the campus plan was approved.

The application proposes a FAR of 0.8, less than the maximum 1.80 permitted.

210.9 *Before taking final action on an application for use as a college or university, the Commission shall submit the application to the D.C. Office of Planning and the D.C. Department of Transportation for review and written reports.*

OP anticipates that DDOT will submit formal comments under separate cover.

Summary – Further Processing Requests

Mary Graydon Center

The Mary Graydon addition would be located the center of the Main Campus, well buffered from nearby residential uses, and is designed to provide enhanced services and activity space for existing students. The project would not result in additional staff, faculty, or students or change existing traffic patterns or parking facilities. As a result, the project should not have any adverse impacts with regard to noise, traffic, the number of students, or other objectionable conditions on neighboring property.

Nebraska Hall

The Nebraska Hall addition should not create adverse impacts or objectionable conditions within the neighboring community with regard to noise, traffic & parking, or the number of students and faculty. Potential noise impacts would be mitigated by its distance from neighboring uses as well as the scale and size of the addition. The proposal would maintain the same height as the existing structure, and would be over 105' away from the nearest residence. The main building entrance would continue to be located along Nebraska Avenue. The proposed addition would remove 26 surface parking spaces on the property, which should reduce vehicle trips to the site. AU also proposes to add 30 long-term, secure bicycle parking spaces and 10 short-term spaces onsite to accommodate residents and visitors. Finally, the number of students proposed should not have any adverse impacts. The site is currently utilized for student housing and the addition would continue this use. The addition would be separated from adjacent low-density residential use by a 45' rear yard and 60' right-of-way, which would include a landscaped buffer and fence. No adverse impacts to other objectionable conditions are anticipated as the nearest residential community, Ft. Gaines, has already identified approval conditions for the project, which were addressed in the applicant's proposal. These conditions address enforcement of the student conduct code, construction management, site fencing and landscaping, and use of the proposed first floor multipurpose room as a meeting space for the Ft. Gaines Citizens Association.

East Campus

OP recommends approval of the further processing request for the proposed redevelopment of the East Campus with the following conditions:

1. Provide a 65 foot landscape buffer along the eastern property line adjacent to Westover Place.
2. Permit non-residential buildings at 2 and 3 stories within the next 40 feet and locate residential uses no closer than 100 feet to the eastern property line adjacent to Westover Place.
3. Allow 3,020 square feet of retail uses within the Visitor Center building only.
4. Submit a comprehensive retail plan as an amendment to the Campus Plan that identifies the type of retail proposed, how it is integral to the campus use, and not in conflict with the Comprehensive Plan.

VIII. COMPREHENSIVE PLAN

The Comprehensive Plan Future Land Use Map identifies the American University campus as an Institutional Use, which includes "land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions." The residential neighborhoods surrounding the Main

Campus are shown as low density to the north, south, and west and moderate density to the east. Low density residential uses surround the Tenley Campus in all directions. Low density neighborhoods are generally defined by their building type, single-family detached, and lot characteristics, front, side, and rear yards. Moderate density areas include a mix of residential uses including rowhouses and low rise apartment buildings.

The Comprehensive Plan Generalized Policy Map identifies all residential areas surrounding American University, for both the Main and Tenley Campus, as Neighborhood Conservation Areas. While this designation anticipates that institutional uses will be developed at a moderate scale, it also establishes an explicit “guiding philosophy” of “conserving and enhancing neighborhoods within this category.” This philosophy is expanded on throughout the Comprehensive Plan and is introduced in the Land Use Chapter with a statement:

The growth of private institutions has generated significant concern in many of the city’s neighborhoods. These concerns relate both to external impacts such as traffic and parking, and to broader concerns about the character of communities where institutions are concentrated or expanding. (§ 315.5)

The proposed development is located within the Rock Creek West Area of the Comprehensive Plan. Relevant to policies of the Land Use, Education, and Rock Creek West Elements of the Plan include (emphasis added by OP):

Policy LU-2.3.5: Institutional Uses

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

Policy LU-3.2.3: Non-Profits, Private Schools, and Service Organizations

“Ensure that large non-profits, service organizations, private schools, seminaries, colleges and universities, and other institutional uses that occupy large sites within residential areas are planned, designed, and managed in a way that minimizes objectionable impacts on adjacent communities. The zoning regulations should ensure that the expansion of these uses is not permitted if the quality of life in adjacent residential areas is significantly adversely affected.”

Policy EDU-3.3.2: Balancing University Growth and Neighborhood Needs

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

Policy EDU-3.3.4: Student Housing

“Encourage the provision of on-campus student housing in order to reduce college and university impacts on the housing stock in adjacent neighborhoods. Consider measures to address the demand for student housing generated by non-District institutions with local branches.”

Policy EDU-3.3.5: Transportation Impacts of Colleges and Universities

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

Policy RCW-1.1.1: Neighborhood Conservation

“Protect the low density, stable residential neighborhoods west of Rock Creek Park and recognize the contribution they make to the character, economy, and fiscal stability of the District of Columbia. **Future development in**

both residential and commercial areas must be carefully managed to address infrastructure constraints and protect and enhance the existing scale, function, and character of these neighborhoods.”

Policy RCW-1.1.3: Conserving Neighborhood Commercial Centers

Support and sustain local retail uses and small businesses in the area’s neighborhood commercial centers.

These centers should be protected from encroachment by large office buildings and other non-neighborhood serving uses. Compatible new uses such as multi-family housing or limited low-cost neighborhood-serving office space (above local-serving ground-floor retail uses) should be considered within the area’s commercial centers to meet affordable housing needs, sustain new neighborhood-serving retail and small businesses, and bring families back to the District. 2308.4

Policy RCW-1.1.8: Managing Institutional Land Uses

“Manage institutional land uses in the Rock Creek West Planning Area in a way that ensures that their operations are harmonious with surrounding uses, that expansion is carefully controlled, and that potential adverse effects on neighboring properties are minimized. Ensure that any redevelopment of institutional land is compatible with the physical character of the community and is consistent with all provisions of the Comprehensive Plan and the underlying zoning rules and regulations. Densities and intensities of any future development on such sites should reflect surrounding land uses as well as infrastructure constraints and input from the local community.”

Policy RCW-1.1.11: Managing Transportation Demand

“Improve traffic service levels on the area’s thoroughfares by developing transportation systems management programs, transportation demand management programs, and other measures to more efficiently use the area’s road network and reduce the volume of vehicle trips generated by new development. Ensure that new development does not unreasonably degrade traffic conditions, and that traffic calming measures are required to reduce development impacts. This policy is essential to protect and improve the quality of life and the residential character of the area.”

Policy RCW-1.1.12: Congestion Management Measures

“Ensure that land use decisions do not exacerbate congestion and parking problems in already congested areas such as the Friendship Heights, Tenleytown, and Connecticut/Van Ness Metro stations. When planned unit developments are proposed in these areas, require traffic studies which identify the mitigation measures that must occur to maintain acceptable transportation service levels—and secure a commitment to implement these measures through transportation management plans. Traffic studies and mitigation plans should consider not only the impacts of the project under consideration but the cumulative impact of other projects which also may impact the community, as well as the impact of non-resident drivers using local streets. Car-sharing, bicycle facilities, and designs which promote transit use should be encouraged as mitigation measures, in addition to measures addressing passenger and service vehicles.”

Policy RCW-1.1.14: Bicycle Facilities

“Improve facilities for bicyclists, to the extent feasible and consistent with traffic safety considerations, along Connecticut, Wisconsin, and Massachusetts Avenues, along MacArthur Boulevard, along Calvert Street (to Rock Creek Park), and at each of the Metrorail stations”.

Policy RCW-1.2.5: Historic Resources

“Conserve the important historic resources of the neighborhoods west of Rock Creek, including but not limited to the Glover, Taft, and Ellington bridges; the Washington National Cathedral; mansions such as the Tregaron, Twin Oaks, Cloverdale, and Rosedale Estates, and the Babcock-Macomb House, the Rest, and Owl’s Nest; the Pine Crest/Greystone/Klinge Mansion cluster of houses near Rock Creek; the historic districts such as Cleveland Park, Woodley Park, and Grant Road; historic apartment buildings such as the Kennedy-Warren, Cathedral Mansions, the Ponce de Leon, 3901 Connecticut, and Alban Towers; the Chevy Chase arcade and Avalon and Uptown

Theaters; the Spring Valley Shopping Center; and the sites of significance inventoried in the Historic Resources Survey conducted by the Tenleytown Historical Society and the National Park System.”

Summary

In order to fully comply with the objectives and policies cited above, American University can take additional measures to lessen the impact it has on the surrounding communities. The amount of retail development proposed for the East Campus would introduce land uses that are not anticipated on the site, called for on the Comprehensive Plan, or allowed as a matter-of-right under zoning. The siting and scale of the proposed residential buildings on the East Campus would also have an adverse impact on the adjacent residential community, identified as a Neighborhood Conservation Area within the Comprehensive Plan. And finally, without additional mitigation, the proposed expansion of bleachers along the campus’ western boundary could create objectionable conditions with regard to noise and impact quality of life for residential community to the west.

IX. COMMUNITY COMMENTS

The Office of Planning has received dozens of letters, resolutions, and petitions regarding the 2011 American University Campus Plan. Formal comments, largely in opposition, were submitted from three impacted Advisory Neighborhood Commissions, ANC’s 3E, 3D, and 3F, as well as neighbors from Westover Place, University Park, Westley Heights, and Spring Valley.

Many of the issues raised concerned the following components of the campus plan:

- Enrollment Cap
- Traffic & Parking
- Location of Student Housing
- Student Behavior
- Residential Buffers
- Lack of Community Engagement
- Tenley/Washington College of Law proposal

OP has met on a number of occasions with many of the affected ANCs and residents over the past several months to discuss their concerns and potential solutions. With regard to the Tenley Campus, which generated a considerable amount of public comment, OP recognizes that the final site plan and design for the proposed use are still being developed. As such, we may supplement the record with additional comment on this project and other portions of the campus plan as new and additional information becomes available.

X. AGENCY COMMENTS

The Metropolitan Police Department (MPD) informed the Office of Planning by email on May 2, 2011 that it has no objections to the proposed campus plan. The Fire and Emergency Services (FEMS) representative indicated a desire to meet with the applicant directly and OP forwarded this request to university representatives. No additional written comment was received from other District agencies.

Historic Resources

The Main campus includes an original landscape plan by Frederick Law Olmsted with a central quadrangle green, which remains the primary organizing element of the campus. Although not required by the campus plan regulations, the applicant has investigated the campus’s potential historic resources. Based on this information, the Office of Planning’s Historic Preservation Office (HPO) has concluded that the resources which best reflect the realization of the Olmsted plan and successive phases of the university’s development appear eligible for landmark designation or would be considered contributing structures in a historic district. These eligible resources include the President’s Office (1925), the Hamilton Building (1935), the main quad itself, and several

buildings surrounding the quad including Hurst (1897), McKinley (1917), the original section of Battelle Library (1926), East Quad (1957), and the Spiritual Life Center (1965).

There are two pending nominations before the Historic Preservation Review Board for the Tenley campus: one for the Dunblane House (1840s) at the southwest corner of the site and one for the entire campus (formerly Immaculata School), including the Dunblane House and all grounds. The HPO is working with AU to explore redevelopment options that are compatible with the character of the campus in the event some or all portions of the property are designated.

OP encourages the applicant to continue to consider the importance of the historic resources and notes that the historic context will be considered in recommendations for further processing and could include necessary actions by other boards or government agents.

XI. RECOMMENDATION

OP supports the applicant's proposal to create additional student housing on the Main Campus, upgrade its academic and athletic facilities, add student activity space at the core of the campus, and relocate the Washington College of Law to a site that is more transit accessible. However, the campus plan as proposed would create an imbalance in the provision of student housing and retail activity as well as potentially exacerbate existing issues with noise adjacent to the athletic fields.

The Office of Planning recommends the 2011 Campus Plan be approved with the following conditions:

Noise

1. Reduce and reorient the proposed bleachers at Reeves Field so they do not face the adjacent homes.
2. Install an alternative speaker/sound system at the Williams/Jacobs Recreational Complex fields that would distribute sound more evenly at ground level as opposed to the use of a traditional loud speaker system.
3. Install a sound wall along the western boundary of the William/Jacobs Recreational Complex fields with additional landscaping provided to buffer the view of the wall from the adjoining residential properties.
4. Work with the adjacent neighbors to create an enforcement policy that clearly articulates the types of activities that are subject to its conditions and identify an AU contact person that is directly accountable for their enforcement.

Number of Students

5. Accept the overall total student caps and clarify that it include all undergraduate, graduate and law students, and any student taking at least one class or course at any of the campuses covered by the Campus Plan.
6. Hold the graduate student enrollment constant at the fall 2010 figures until additional information is provided and accepted by the Zoning Commission regarding the anticipated growth and use of graduate programs.
7. Cap the law student enrollment at the University stated expectation of 2000 students.

Student Housing

8. Maintain the existing percentage of university-provided student housing at 67% of the total undergraduate enrollment.
9. Reduce the unit count on the East Campus to 400 student housing beds.
10. Locate additional housing on the Main Campus as needed.

East Campus

11. Provide a 65 foot landscape buffer along the eastern property line adjacent to Westover Place.
12. Permit non-residential buildings at 2 and 3 stories within the next 40 feet and locate residential uses no closer than 100 feet to the eastern property line adjacent to Westover Place.

13. Limit retail uses to the 3,020 square feet proposed within the Visitor Center (Building 5).
14. Submit a comprehensive retail plan as an amendment to the Campus Plan that identifies the type of retail proposed and how it is integral to the campus use and not in conflict with the Comprehensive Plan.

JS/ayj

Case Manager: Arlova Y. Jackson

Attachments:

- Appendix A – List of Previously Approved and Returning Campus Plan Projects
- Appendix B - Summary of 2011 Campus Plan Development Projects
- Appendix C - Comparison of Caps from Past, Current, and Proposed Campus Plans
- Exhibit 1 – Location Map
- Exhibit 2 – Aerial Photograph
- Exhibit 3 – 2006 Comprehensive Plan – Future Land Use Map
- Exhibit 4 – 2006 Comprehensive Plan - Generalized Policy Map