

May 20, 2011

VIA HAND DELIVERY

Ms. Sharon Schellin
Secretary to the D.C. Zoning Commission
441 4th Street NW, Suite 210S
Washington, DC 20001

Re: Z.C. Case No. 11-07 - American University's 2011 Campus Plan and Further Processing Applications – Prehearing Statement of the Applicant

Dear Ms. Schellin:

On March 18, 2011, American University (the “Applicant”) filed the American University Campus Plan (the “Campus Plan”) for the period from 2011-2020. The attached prehearing statement highlights the changes and modifications to the Campus Plan and Further Processing applications that have occurred in response to additional feedback and dialogue that the university has engaged in with Advisory Neighborhood Commissions (“ANC”) 3D and 3E, neighborhood groups, representatives of the Office of Planning (“OP”), the Historic Preservation Office (“HPO”), and the District Department of Transportation (“DDOT”).

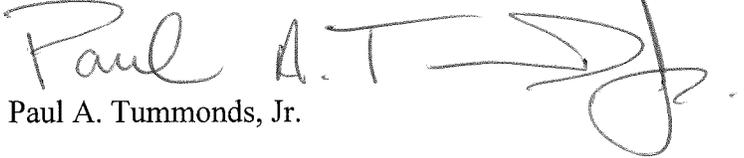
In addition, please note that the original application form submitted to the Office of Zoning erroneously noted that Lots 5, 804-806, 812 and 817 in Square 1600¹ were included in this Campus Plan application. These lots, while owned by the Applicant, are not included in the Campus Plan. Exhibit No. 11 of the March 18, 2011 application materials (Campus Vicinity Map) specifically noted that these properties are not included in the Campus Plan application.

¹ The addresses of these Lots are: 4825 Glenbrook Road, NW; 4625 Rockwood Parkway, NW; 4629 Rockwood Parkway, NW; 4633 Rockwood Parkway, NW; 4621 Rockwood Parkway, NW; and 4835 Glenbrook Road, NW.

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Please do not hesitate to contact me if you have any questions regarding the prehearing statement and the issue noted above.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul A. Tummonds, Jr." with a stylized flourish at the end.

Paul A. Tummonds, Jr.

Enclosures

cc: Certificate of Service



**AMERICAN UNIVERSITY
2011 CAMPUS PLAN**

PREHEARING STATEMENT

MAY 20, 2011

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I. INTRODUCTION

On March 18, 2011, American University filed the American University Campus Plan (the “2011 Plan” or the “Campus Plan”) for the period from 2011-2020. The purpose of this prehearing statement is to highlight changes and modifications to the Campus Plan and Further Processing applications that have occurred in response to additional feedback and dialogue that the university has engaged in with Advisory Neighborhood Commissions (“ANC”) 3D and 3E, neighborhood groups, representatives of the Office of Planning (“OP”), the Historic Preservation Office (“HPO”), and the District Department of Transportation (“DDOT”).

The university believes that these modifications and changes further the Campus Plan’s primary goal of supporting AU’s Strategic Plan and academic and facilities needs and:

- Improve and offer attractive student housing to encourage more undergraduate students to live on campus;
- Build a new home for the Washington College of Law at the Tenley Campus near the Metro and a major transportation corridor;
- Provide additional faculty office, research, and related spaces;
- Build additional athletics facilities, an admissions/welcome center, and an alumni center.

This prehearing statement highlights the following changes and modifications to the Campus Plan.

East Campus - In response to comments from ANC 3D, Neighbors for a Livable Community (“NLC”) and residents of the adjacent Westover Place townhome community, the university has agreed to changes and modifications of the originally proposed East Campus project. These modifications result in a significant reduction in the overall intensity of use on the East Campus. These modifications include:

- The removal of 180 beds from the project so there will be a total of 590 new beds on the East Campus;
- Increasing the rear setback of student residential buildings from 40 feet to a minimum of 100 feet;
- A condition that no Freshmen be allowed to live on the East Campus;
- The reduction of the overall building square footage proposed on the East Campus by approximately 18% since the filing of the Campus Plan and Further Processing applications on March 18, 2011;
- The removal of the proposed right-in, right-out vehicular entrance and exit to Massachusetts Avenue; and
- The introduction of a mid-block pedestrian actuated signalized cross walk to allow pedestrians to cross Nebraska Avenue between the intersections of New Mexico and Nebraska Avenue, and Massachusetts Avenue and Ward Circle

A complete set of updated site plans, elevations, sections and perspectives are included in Exhibit 1.

Nebraska Hall Addition – As a result of further refinement of the floor plans for this project, the proposed addition to Nebraska Hall will now add 150 beds to the existing building. No change to the footprint of this project that was presented in the March 18, 2011 Campus Plan

application materials will occur as a result of the increased number of beds. The addition's bulk, height and appearance will continue to match the existing building. A complete set of updated site plans, elevations, and perspectives are included in Exhibit 2.

Washington College of Law Relocation to the Tenley Campus - AU continues to work with HPO, OP, ANC 3E and representatives of the Tenley Campus Neighbors Association ("TCNA") regarding the massing, height and location of the buildings that will become the future home of the Washington College of Law at the Tenley Campus. AU expects to file a Further Processing application for the new Washington College of Law facilities in the Summer of 2011, with a public hearing expected to occur in the Fall of 2011. Updated site plans are included in Exhibit 3.

North Hall – The March 18, 2011 Campus Plan application materials noted that the North Hall site (the existing parking lot behind the President's Office Building) will be six stories tall, consistent with nearby residence halls. Based on further review of this site, it is now anticipated that the North Hall will include approximately 360 beds, which is an increase from the 200 beds originally proposed. American University anticipates filing a Further Processing application for this site shortly, with a public hearing likely to occur a few months later. Updated site plans, elevations, and sections are included in Exhibit 4.

Section III of this prehearing statement addresses issues related to overall number of beds proposed in the Campus Plan, the university's acceptance of a cap on the proposed number of students, faculty and staff in the 2011 Campus Plan, and the Transportation Demand Management program that the university will undertake in the 2011 Campus Plan.

II. DISCUSSION OF MODIFICATIONS TO THE PLANS FOR THE DEVELOPMENT OF THE EAST CAMPUS, THE NEBRASKA HALL ADDITION, THE RELOCATION OF THE WASHINGTON COLLEGE OF LAW FACILITIES TO THE TENLEY CAMPUS, AND NORTH HALL

A. Development of the East Campus

As discussed in detail in the March 18, 2011 Campus Plan application materials, the proposed East Campus will be located on an 8.1 acre parcel that is located across Nebraska Avenue from the central campus and is currently used as a surface parking lot with approximately 900 parking spaces. A brief review of the structures proposed on the East Campus including any changes that have been made to those buildings is provided below.

Building No. 1 (located along Nebraska Avenue) will continue to include 274 residential beds in six stories with a measured building height of approximately 62 feet. Two changes have been made since the March 18, 2011 Campus Plan application. The amount of campus and community serving retail has decreased from approximately 11,000 square feet to approximately 9,000 square feet and an opening in the building's frontage on Nebraska Avenue has been created in order to accommodate a vehicular driveway into the East Campus from Nebraska Avenue.

Building No. 2 (located along New Mexico Avenue) will continue to be five stories tall, with a measured building height of approximately 54 feet. This building will now include approximately 140 residential beds, rather than the 167 beds previously shown, and approximately 4,900 square feet of campus and community-serving retail (which has been added to the building's ground floor).

Building No. 3 (located in the middle of the proposed East Campus quad) remains a five story residential building, approximately 54 feet tall. The number of beds proposed in this building has increased to 176, compared to the 145 beds proposed in the March 18, 2011 Campus Plan application materials.

Building No. 4 (the building located in the middle of the East Campus at the eastern end of the proposed East Campus quad) has undergone the most significant change since the filing of the March 18, 2011 Campus Plan application materials. This building was formerly a five story residential building that included 179 beds. This building is now proposed to be two stories tall and will be used for administrative and academic purposes only -- no beds are proposed in this building. The size of this building has been reduced from 56,085 gross square feet to 24,000 gross square feet. The building has also been reoriented to provide a physical buffer between the residential uses on the East Campus and the Westover community to the East.

Building No. 5 (located at the intersection of Nebraska and New Mexico Avenues) will continue to house a new Admissions Welcome Center, other administrative offices and 3,000 gross square feet of campus and community serving retail. No changes have been made to this building since the filing of the Campus Plan application on March 18, 2011. This building will continue to be four stories tall with a measured building height of approximately 54 feet.

Building No. 6 the building (which provides a physical buffer between the residential uses on the East Campus and the Westover Place community to the east) remains an administrative/academic building and will continue to be two stories tall, with a measured building height of approximately 34 feet. The massing of this building has changed since the filing of the March 18, 2011 Campus Plan application materials, including the reduction in the size of this building from approximately 43,505 gross square feet to approximately 17,700 gross square feet.

In response to the comments that it has received from representatives of Westover Place, NLC, ANC 3D, and OP; the university and its architects have focused on addressing the following issues:

- Reducing the intensity of use on the East Campus;
- Creation of a mix of uses on the East Campus more evenly split between residential and academic/administrative uses;
- Reviewing the sufficiency of the setback between the buildings on the East Campus and the adjacent Westover Place properties and enhancing the landscaped buffer in that setback area;
- Providing additional details on the sustainability measures that will be incorporated into the design of the East Campus; and
- Further review of pedestrian and vehicular traffic impacts that will occur in the surrounding area as a result of the development of the East Campus.

1. *The Revised Plans for the East Campus Result in a Significant Reduction in the Intensity of Use on the East Campus*

The university initially proposed a series of residential buildings on the East Campus that included approximately 1,000 residential beds. During the community dialogue process, residents of the adjacent communities voiced concern about the ability of the East Campus to house any undergraduate students. These residents said that they would like to see only administrative and academic uses on the East Campus and that the university should construct zero residential beds on the East Campus. After numerous meetings and discussions with these residents, the university agreed to reduce the number of beds that it was proposing on the East Campus to 770 (as was depicted in the March 18, 2011 Campus Plan application materials).

American University is now proposing a more balanced mix of uses on the East Campus which includes academic, administrative, retail and residential space. The attached plans (see Exhibit 1) depict the proposed construction of 590 beds on the East Campus, a reduction of over 40% from the university's original proposal. American University has also agreed to accept a condition that no Freshmen be allowed to live on the East Campus. In addition, the attached plans for the development of the East Campus reflect a reduction of the overall building square footage proposed on the East Campus by approximately 18% since the filing of the Campus Plan and Further Processing applications on March 18, 2011.

The university and its design team are confident that the creation of 590 residential beds and academic/administrative/retail uses on the East Campus can be accomplished without diminishing the quality of life and without creating adverse impacts on the neighboring property owners. This mixed use development will still allow the university to address its goals of providing new and varied types of housing to its undergraduate students. Residential Building Nos. 2 and 3 on the East Campus have been oriented in such a way that no windows will face the Westover Place community. In addition to mitigating the visual impact of these buildings, this orientation also reduces the potential amount of noise generated by the residential use. Moreover, Building No. 4, which was previously five stories tall and included 179 beds, has been significantly reduced in height and size and the proposed use has changed. The new Building No. 4 no longer includes any residential use, is only two stories tall and has been reduced in size by approximately 43%.

2. *The Setback to the Westover Place Community is Appropriate and the Landscaped Buffer Will Include a Variety of Significant Trees*

The location of the new Building No. 6 and Building No. 4 will continue to block noise from activities which occur on the two courtyards located in the center of the East Campus. In addition, there will be no direct entrance to the ground floor of Building No. 6 and Building No. 4 on the eastern elevation of those buildings. There will also be no balconies or terraces on the eastern elevations of those buildings. These design features were created to address concerns from the Westover Place community regarding the potential noise that may arise from Building No. 6 and Building No. 4.

The distance from the rear of Building No. 4 and Building No. 6 to the Westover Place property line ranges from 40-80 feet. The measured height of these buildings is 34 feet, which is roughly equivalent to, or less than, the heights of the Westover Place townhouses. Building No. 4 and Building No. 6 now have flat roofs and no penthouse structures on their roofs, in order to further diminish the apparent height of these Buildings. American University believes that it is appropriate to have buildings of similar size and scale, like the Westover Place townhouses and Building Nos. 6 and 4, separated by a distance of 40-80 feet. The closest point that a residence hall (which is five

stories) is to the Westover Place property line is approximately 100 feet and that portion of the residence hall provides the narrowest profile view to the Westover Place properties.

The proposed buffer area between Building No. 6, Building No. 4 and the Westover Place community is currently populated with a large number of mature trees as shown in the Woodland Buffer Plans included in Exhibit 1. The university will augment this area with a landscaped berm, which further reduces the view of Building No. 6 and Building No. 4 from the Westover Place community. Additional plantings in the understory of the landscaped buffer will be installed in order to create a well designed landscape buffer that will be effective all year long. This buffer area will also be contoured and landscaped in a manner that will make it unlikely that students will use this area for passive or active recreational activities. This significant landscaped buffer area mitigates the visual impact of the East Campus development on the Westover Place community.

3. The Development of the East Campus Will Include Enhanced Sustainability Measures

All of the buildings on the East Campus will be designed and constructed in order to achieve LEED Gold certification. In addition, the project will incorporate Low-Impact Development (LID) elements (such as flow-thru planters and bioretention areas) throughout the project. These features are identified in the Sustainability and Site Features plan included in Exhibit 1. These elements will represent a significant improvement over the stormwater management structures that are currently provided for the existing surface parking lot.

4. Pedestrian and vehicular traffic impacts

The most significant changes that have occurred to the East Campus that impact pedestrian and vehicular traffic in the surrounding area are: (i) the removal of the right-in, right-out vehicular entrance/exit to Massachusetts Avenue; (ii) the retention of the existing right-in, right-out vehicular entrance/exit to Nebraska Avenue; and (iii) the installation of a mid-block pedestrian actuated signalized cross-walk to allow pedestrians to cross Nebraska Avenue between the intersections of New Mexico and Nebraska Avenue, and Massachusetts Avenue and Ward Circle.

American University has agreed to remove the proposed right-in, right-out vehicular entrance/exit to Massachusetts Avenue in response to the concerns of the Westover Place townhome community. American University and its traffic and parking consultants (Gorove/Slade Associates) believe that it is important to have two means of vehicular ingress/egress to the East Campus, so the existing vehicular ingress/egress from Nebraska Avenue has been retained. As discussed in greater detail in the Addendum to the Transportation Report (Exhibit 6), the location of the vehicular ingress/egress to Nebraska Avenue allows for an appropriately located pedestrian crosswalk across Nebraska Avenue that will deter potential jaywalking, better distribute pedestrian crossings along Nebraska Avenue and will not adversely impact vehicular traffic along Nebraska Avenue.

Gorove/Slade Associates has concluded that the proposed changes to the Campus Plan described in this prehearing statement do not alter the overall conclusions of the Transportation Report that was included in the March 18, 2011 Campus Plan application materials. Gorove/Slade continues to conclude that the 2011 Campus Plan will not have an adverse impact on the surrounding transportation network. However, the proposed changes to the Campus Plan do generate modifications to the recommendations contained in the Transportation Report as follows:

- Removing the right-in/right-out driveway to the East Campus parking lot on Massachusetts Avenue leads to design changes on the East Campus that reduces the need for a pedestrian actuated traffic signal at the location of the right-in/right-out across from the NAC driveway. The Transportation Report now recommends that the concept of adding a pedestrian actuated traffic signal at this location be incorporated into the proposed study of Ward Circle as a short-term improvement.
- The change to maintain the right-in/right-out driveway to the East Campus on Nebraska Avenue had the potential to lead to mid-block pedestrian crossings along Nebraska Avenue. To mitigate this concern, the Transportation Report recommends construction of a pedestrian actuated traffic signal at the location of the right-in/right-out vehicular entrance/exit on Nebraska Ave. The addition of another crossing for pedestrians will help disperse the pedestrian impact over multiple crosswalks across Nebraska Avenue.
- The bus stop recommendations have been updated to reflect the access and crosswalk recommendations above. The Transportation Report now recommends that the six AU shuttle and Metrobus stops located along Nebraska Avenue and New Mexico Avenue adjacent to campus be consolidated into two stops, on opposite sides of the new pedestrian crossing on Nebraska Avenue. This will lead to a simpler routing for the campus population and fewer times when buses stop along Nebraska Avenue.

Construction of the proposed East Campus will result in only 400 parking spaces being located on the East Campus (there are currently 900 parking spaces), 150 spaces located in a single below-grade level of parking that will be located under Building Nos. 1-6 and 250 spaces on the remaining surface parking lot adjacent to Massachusetts Avenue and Ward Circle. Loading facilities for all six buildings will continue to be located in the below grade parking level. Access to the below-grade parking and loading facilities will occur from New Mexico Avenue, in the approximate location of the existing entrance to the Nebraska Avenue parking lot. The retention of the existing right-in, right-out vehicular entrance/exit to Nebraska Avenue allows access to the interior of the East Campus by all Fire and Life Safety vehicles and access to the 250 at-grade parking spaces on the undeveloped portion of the East Campus adjacent to Massachusetts Avenue and Ward Circle.

B. Nebraska Hall Addition

As noted in the March 18, 2011 Campus Plan application materials, the proposed addition to Nebraska Hall (the “Addition”) is designed to mesh seamlessly with the existing Nebraska Hall. The residential facilities provided in the Addition are designed to be the university’s premium housing, primarily for juniors and seniors. The proposed Addition will allow the university to achieve its goals of enhancing the undergraduate student housing experience at AU, with minimal impacts on neighboring residences. The new number of additional students that will be housed in the Addition, 150 beds, was the result of further refinement in the floor plans of the project. There will be no change to the footprint of the Addition as it was presented in the March 18, 2011 Campus Plan application materials. A site plan, updated elevations and perspectives are included in Exhibit 2.

C. Relocation of the Washington College of Law Facilities to the Tenley Campus

AU continues to work with representatives of HPO, OP, ANC 3E and representatives of TCNA regarding the massing, height, and location of the buildings that will become the future home of the Washington College of Law at the Tenley Campus. Updated site plans are included in Exhibit 3. AU expects to file a Further Processing application for these new facilities in the Summer of 2011.

D. North Hall

The March 18, 2011 Campus Plan application materials noted that the North Hall site (the existing parking lot behind the President's Office Building) will include housing for 200 students and will be six stories tall, consistent with nearby residence halls. Based on further review of this site, it is now anticipated that the North Hall will include approximately 360 beds. Updated site plans, elevations, and a section plan are included in Exhibit 4. American University anticipates filing a Further Processing application for this site shortly, with a public hearing likely to occur a few months later.

E. Updated Plans

Included in Exhibit 5 are various plans that were included in the March 18, 2011 Campus Plan application materials that have been updated to reflect the changes that have been made to the site plans for North Hall and East Campus.

III. RESPONSES TO ADDITIONAL ISSUES THAT HAVE BEEN RAISED REGARDING GENERAL CAMPUS PLAN ISSUES

A. Proposed Number of Beds Provided in the Campus Plan

The proposed Campus Plan distributes beds throughout all parts of the Main Campus (on the portions of the Campus east, north, and west of Nebraska Avenue) and follows the university's planning goals and organizing principles of the Campus. The 590 beds on the East Campus represents only 14% of the total number of beds proposed on AU's Campus. The 180 beds that have been removed from the East Campus have been replaced by the additional beds proposed in the Nebraska Hall Addition and North Hall. The target for total housing remains approximately 4,300 beds.

B. Proposed Student Enrollment and Employee Cap

The March 18, 2011 Campus Plan application materials noted that the 2011 Plan envisions a total enrollment of up to 13,600 students and a faculty and staff population of 2,900. The university will agree to a condition in the Campus Plan order which includes the caps of 13,600 students and 2,900 faculty and staff.

C. Transportation Demand Management ("TDM") Program

In response to questions raised by DDOT, American University agrees to implement a TDM program that includes the following components.

- AU will compile annual monitoring reports, which will be made public and submitted to DDOT. The first report will be issued no later than one-year after approval of the campus plan. These reports will include the following information:

- Mode split surveys of the campus population, broken down by students and employees;
 - Current parking inventory and occupancy on a typical weekday;
 - Number of parking permits sold per year;
 - Parking availability on surrounding neighborhood streets;
 - Statistics on the Good Neighbor Program, such as number of tickets issued
 - Number of registered carpools;
 - Zipcar and Capital Bikeshare usage data;
 - Number of people signed up for SmartBenefits;
 - AU Shuttle ridership; and
 - Inventory and occupancy of bike racks.
- AU will improve marketing of alternative modes of transportation on websites, including AU specific transit and bicycle maps, and dedicated materials targeting each segment of the campus population. AU will distribute the targeted information to new hires and accepted students.
 - AU will market transportation information to attendees to special events on campus, and will not include parking subsidies in event or ticket costs.
 - AU will include transportation information on its electronic message boards within campus.
 - AU will promote the regional Guaranteed Ride Home program to all employees using alternative modes.
 - AU will continue the Good Neighbor Program directed at limiting campus population use of neighborhood on-street parking.
 - AU will continue to provide discounts to carpoolers and ride-matching services (Zimride), and will extend preferred parking spaces to registered carpools.
 - AU will maintain the Zipcar spaces currently on the Nebraska Avenue parking lot and Tenley campus during construction, and ensure their replacement on campus after construction.
 - AU will maintain the SmartBenefits program and SmarTrip vending which it currently provides.
 - AU will maintain the student run bike-lending program and the bike commuter benefit.
 - AU will construct 150 long-term secured and enclosed bicycle parking spaces and 50 short-term bicycle parking spaces meeting DDOT standards on the East Campus. The use of these spaces will be monitored and the numbers increased if the average weekday use is over 85%.
 - AU will construct 30 long-term secured and enclosed bicycle parking spaces and 10 short-term bicycle parking spaces meeting DDOT standards at Nebraska Hall. The use

of these spaces will be monitored and the numbers increased if the average weekday use is over 85%.

- AU will construct 50 long-term secured and enclosed bicycle parking spaces and 20 short-term bicycle parking spaces meeting DDOT standards on the Tenley Campus. The use of these spaces will be monitored and the numbers increased if the average weekday use is over 85%.
- AU will provide the funds for a Capitol Bikeshare station, to be located on the Tenley Campus, to supplement the existing Main Campus station.
- AU will become a corporate member of Capital Bikeshare to provide memberships to employees at discounted rates.
- AU will work with DDOT and provide the funds necessary to expand the sidewalks on the northern side of Nebraska Avenue adjacent to campus to provide an off-street cycling facility, as recommended in the Transportation Report.

The university will agree to include this TDM program as a condition of approval of the Campus Plan.

IV. CONCLUSION

As noted above, the university believes that the modifications and changes described in this prehearing statement further the Campus Plan's primary goal of supporting AU's Strategic Plan and academic and facilities needs. In addition, the university believes that these modifications and changes directly respond to issues that have been raised during the extensive community dialogue process. The university looks forward to presenting the AU Campus Plan and Further Processing applications to the Zoning Commission on June 9, 2011.