


## **MEMORANDUM**

**TO:** District of Columbia Zoning Commission

**FROM:** Shepard Beamon, Development Review Specialist  
 Joel Lawson, Associate Director Development Review

**DATE:** November 11, 2024

**SUBJECT:** ZC Case 16-18G – Public Hearing Report for a Map and Text Amendment to the Georgetown University Campus Plan

### **I. RECOMMENDATION**

The Office of Planning (OP) has reviewed the proposed amendments to Zoning Commission (ZC) Order No. 16-18 and recommends **approval** of the requested campus plan amendments to the approved Georgetown University 2017-2036 Campus Plan for the following:

- (a) Amend conditions for treatment of undergraduate housing on the Campus;
- (b) Name change from “Main” Campus to “Hilltop” Campus; and
- (c) Hilltop Campus boundaries expansion to include 3600 M Street NW (Car Barn).

OP also recommends **approval** of the requested further processing for the use of the Car Barn building for academic and administrative use.

### **II. BACKGROUND**

The Georgetown University Campus Plan is a twenty-year plan for the University approved in September 2016, with subsequent modifications and further processing applications. In this filing, the University is requesting amendments to the Plan for enrollment totals and the incorporation and use of new property to be added to the Campus.

### **III. APPLICATION-IN-BRIEF (FOR CAR BARN ONLY)**

<b>Applicant:</b>	Goulston & Storrs for Georgetown University
<b>Address:</b>	3600 M Street NW (Car Barn)
<b>Zone:</b>	R-3/GT; MU-4
<b>Ward and ANC:</b>	Ward 2; ANC 2E
<b>Legal Description:</b>	Square 1203, Lot 47
<b>Property size:</b>	18,600 square feet

<b>Generalized Policy Map Designation:</b>	Institutional Uses - Much of the land identified as institutional on the map represents colleges and universities; change and infill can be expected on each campus consistent with campus plans. Policies in the Land Use and the Educational Facilities Elements address the compatibility of such uses with surrounding neighborhoods.
<b>Future Land Use Map Designation:</b>	Moderate Density Residential - Defines neighborhoods generally, but not exclusively, for rowhouses as well as low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single-family homes, two- to four-unit buildings, row houses, and low-rise apartments. In some neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all).  Low Density Commercial – Defines shopping and service areas that are generally lower in scale and intensity. Retail, office and service businesses are the predominant uses. Areas with this designation range from small business districts that draw primarily from the surrounding neighborhoods to larger business districts that draw from a larger market area.
<b>Historic District</b>	Georgetown Historic District
<b>Historic Landmark</b>	Capital Traction Co. Union Station

#### IV. PROPOSED MODIFICATIONS

##### Modification to Traditional Undergraduate Program Enrollment

The main campus Traditional Undergraduate Program Headcount (TUP) maximum is 6,675 students, calculated on a semester basis. All undergraduate students enrolled in the traditional undergraduate programs — regardless of their status as full-time or part-time — are included in the TUP headcount. As approved by the Zoning Commission, the original order included the following condition:

*10. During the term of the Campus Plan, the Traditional Undergraduate Program student headcount shall not exceed 6,675 students. For purposes of this condition, the Traditional Undergraduate Program student headcount shall be defined as the Main Campus student headcount as defined in Condition 9 plus students studying abroad minus the number of graduate students, professional students, students enrolled in the School of Continuing Studies, non-degree students and students returning for their second degree in nursing, all by headcount (for purposes of Conditions 8 and 28 of this Order, each such student counted under the Traditional Undergraduate Program student headcount being a “Traditional Undergraduate Program student”).*

As the University continues to grow and relocate programs to the Capitol Campus, the applicant proposes an addendum (10A) to this condition as detailed in [Exhibit 3H](#) and Attachment A of this report. The University proposes no changes to the approved total enrollment of the Hilltop Traditional Undergraduate Program through the remainder of the 2024-25 school year. The addendum proposes the exclusion from the Hilltop Campus TUP headcount of an agreed upon number of undergraduate students enrolled at the Capitol Campus who attend one or two courses at the Hilltop Campus

beginning in the 2025-26 school year. The Capitol Campus Undergraduate Program students will still count towards the overall Hilltop Campus headcount.

The proposed addendum 10A includes conditions that relate to housing, permitting Capitol Campus students to reside in University housing or off-campus housing, but restricts living in specified neighborhoods around the Hilltop Campus. The applicant has stated the current Hilltop student conduct would be applicable to the Capitol Campus. Following the 2026-27 school year, the University would work with the GCP to review and evaluate the impacts and patterns from the previous years' enrollments to determine the appropriate enrollment for the future school year.

Table 1 below shows the University proposal for modifications to the TUP for the 2025-26 and 2026-27 school years. As proposed, the University would gradually increase the total headcount for the Capitol Campus over the span of the two terms, however, the total enrollment of Capitol Campus students would remain relatively low.

Table 1: Proposed Enrollment Headcounts 2025-2027

Academic Year	Anticipated Capitol Campus Undergraduate Program Student Headcount	Taking One Course Located at the Hilltop Campus	Taking Two Courses Located at the Hilltop Campus	Total Capitol Campus Undergraduate Program Students Taking Courses on the Hilltop
2025-26 (Juniors only)	140	70 (50%)	28 (20%)	98 (70%)
2026-27 (Juniors & Senior)	320	100 (31%)	32 (10%)	132 (41%)

The applicant has provided several conditions for the addendum to address limitations on student housing and parking, transportation of students between campus, term limitations, and evaluation of the proposed enrollment modifications. The applicant proposes conditions to alleviate potential impacts on traffic and parking for both Campuses, which include:

1. Capitol Campus Undergraduate Program students will be prohibited from bringing a car to the Hilltop Campus or parking their cars in the neighborhoods surrounding the Hilltop Campus.
2. The University will continue to provide convenient and free transportation shuttles between the Hilltop and Capitol Campuses (using the Canal Road Entrance as required under the current Campus Plan).
3. The University will provide Capitol Campus students with the same reduced-rate Capital Bikeshare memberships as is available to the Hilltop students

The University also proposes an addendum to Condition 12 which requires the University to provide a complete report to the Georgetown Community Partnership (GCP) to confirm compliance with Conditions 9-11 per semester related to enrollment maximums, total and locations of student housing, and progress toward the Housing Commitment (Condition 5). Specifically, the modifications to Condition 12 would include an addendum (12A) that states if enrollment maximums exceed those allowed in Conditions 9-11, an equal number of students will be reduced in a corresponding semester within two years, which would be recorded in the GCP report. See Attachment B for the the full addendum.

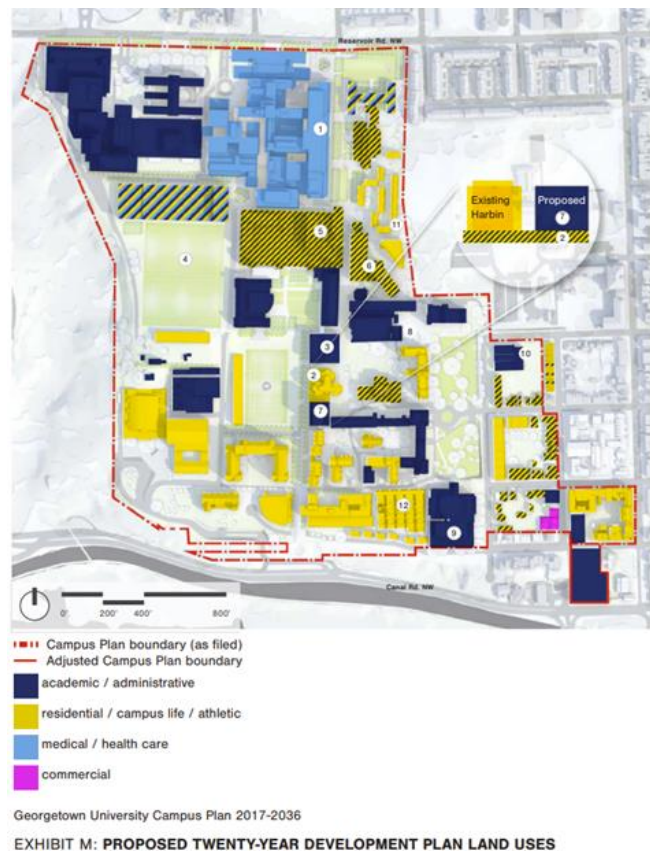
## Change of Name from “Main” Campus to “Hilltop” Campus

The University proposes a name change from the current “Main” Campus to the “Hilltop” Campus to better differentiate it from the Capitol Campus, which continues to expand its downtown presence. The Hilltop Campus would be considered the historic main campus in the northwest quadrant of the District. The applicant has highlighted all occurrences of where “Main Campus” is to be changed to “Hilltop Campus”

## Expansion of Hilltop Campus Boundaries

The University recently acquired the property at 3600 M Street NW, also known as the Car Barn, located on the southern end of the Hilltop Campus. The site is 18,600 square feet with a historic landmark (Capital Traction Co. Union Station) constructed in the late-1800s as a streetcar terminal. The University previously leased the space and purchased the building in 2022. The applicant is seeking further processing approval for the use of the Car Barn for academic and administrative use. The applicant proposes to amend Condition 36 as follows to address the new Hilltop Campus boundaries:

36. The **Hilltop** Campus Plan boundary shall be that boundary depicted on **Exhibits 3I and 3J of the record in Z.C. Case No. 16-18G Exhibit 9B of the record (which is the same as the Campus Plan boundary established by the D.C. Board of Zoning Adjustment in 2000 Plan).**



## V. COMPREHENSIVE PLAN

Subtitle Z §302.10 (m) states that each campus plan or further processing shall provide “A racial equity analysis relative to the Comprehensive Plan in compliance with the Zoning Commission's current Racial Equity Tool...” The Office of Planning concurs with the Applicant’s Comprehensive Plan and Racial Equity Evaluation at [Exhibit 3L](#). The proposal would, on balance, be not inconsistent with the Comprehensive Plan the Generalized Policy Map (GPM) or Future Land Use Map (FLUM).

The GPM designates most of the Campus as Institutional use, with small portions as Neighborhood Conservation Area. The site of the proposed Campus expansion is designated for Institutional Use, and is within a Resilience Focus Area. The site is developed with an existing historic structure, so is not subject to redevelopment but any alterations would be expected to address current environmental and stormwater management requirements as appropriate.

While the majority of the area within the current Campus Plan is designated for Institutional Use, a portion at the east end of the site, including the proposed area for the expansion of the Campus Plan, is designated mainly for Moderate Density Residential and Low Density Commercial. However, the site is developed with a building constructed as a non-residential building, and has been used for various non-commercial uses, including most recently university office space.

The proposal would also be not inconsistent with the Citywide Elements, particularly the Land Use, Economic Development, Historic Preservation, and Education Facilities Elements. The site is within the Near Northwest Area Element, and would address policies related to university campuses.

The applicant has also provided a Racial Equity Analysis. Using the Commission’s Racial Equity Tool, the proposed modification and further processing would not appear to significantly advance or impede the stated policies of the Comprehensive Plan related to racial equity since the requests would not appear to result in an adverse impact on neighboring properties, result in loss of housing or affordable housing opportunities, or lead to other inequities for the neighborhood or planning area as a whole.

- *When considering the following themes/questions based on Comprehensive Plan policies related to racial equity, what are the anticipated positive and negative impacts and/or outcomes of the zoning action? Note: Additional themes may also apply.*

Factor	Question	OP Response
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	Neither the proposed modification nor the boundary expansion would result in the direct displacement of existing residents or businesses.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	Indirect displacement as a result of this zoning relief is not anticipated. Rather, the University has worked closely with the neighborhood to ensure that impacts of the proposals would not result in harm to the neighborhood.
Housing	Will the action result in changes to: <ul style="list-style-type: none"> <li>▪ Market Rate Housing</li> <li>▪ Affordable Housing</li> <li>▪ Replacement Housing</li> </ul>	The request would not negatively impact existing market rate or affordable housing.
Physical	Will the action result in changes to the physical environment such as: <ul style="list-style-type: none"> <li>▪ Public Space Improvements</li> <li>▪ Infrastructure Improvements</li> <li>▪ Arts and Culture</li> <li>▪ Environmental Changes</li> <li>▪ Streetscape Improvements</li> </ul>	The proposal should not result in negative impacts. The proposed boundary expansion is to include an existing historic building which has sat vacant in the past.
Access to Opportunity	Is there a change in access to opportunity? <ul style="list-style-type: none"> <li>▪ Job Training/Creation</li> </ul> Healthcare <ul style="list-style-type: none"> <li>▪ Addition of Retail/Access to New Services</li> </ul>	The proposal should not appear to significantly impact employment opportunities.



Factor	Question	OP Response
Community	How did community outreach and engagement inform/change the zoning action?	The Applicant's filings indicate the extensive community discussions that took place, which significantly impacted the proposed conditions.

## VI. OP ANALYSIS

Since the University does not propose a large headcount of students at the Capitol Campus and intends to provide University housing near the Capitol Campus and multiple means of transportation between campuses, OP does not object to the modification to Condition 10 as proposed. OP does not object to the proposed addendum to Condition 12 allowing flexibility to allow up to an extra 25 students from the maximum enrollments, on a semester basis, as established in Conditions 9 through 11. The University proposes reducing the same number of students from the maximum enrollment for a corresponding semester within two years. Any changes in these enrollments would be recorded in the semester-based report. This flexibility in the number of students should not have a significant impact on overall enrollment totals currently established by the Campus Plan.

Since the University previously leased the Car Barn and the applicant proposes no significant changes in use, OP recommends approval of the request for further processing of the expansion of the campus boundaries to include the Car Barn building. As this would be for academic and administrative purposes only, there should be no change in the intensity of current non-residential use and no undue impact on the surrounding neighborhood.

The proposed change in campus names is appropriate for both locations to better distinguish differences between the two geographical locations. As the University continues to expand programming in the Downtown area, it is necessary to differentiate between them to better meet the demands of each location and the associated curricula. OP has no objections.

The applicant has stated that they have had collaborative discussions with the Georgetown Community Partnership (GCP), however, no comments from the GCP have been submitted to the record as of the date of this report. OP commends the applicant on their ongoing collaboration with the GCP and ANC to ensure compatibility with the neighborhoods adjacent to the Hilltop Campus.

## VII. AGENCY COMMENTS

At Exhibit 15 is a memo from DDOT indicating no objection to this Campus Plan modification.

## VIII. ANC COMMENTS

ANCs 2E and 3D have submitted letters of support in Exhibits 9 and 10, respectively.

## IX. COMMUNITY COMMENTS

As of the date of this report, no comments from the community had been added to the record.

## X. ATTACHMENTS

ATTACHMENT A: Condition 10

ATTACHMENT B: Condition 12

### **ATTACHMENT A: CONDITION 10**

10. During the term of the Campus Plan, the Traditional Undergraduate Program student headcount shall not exceed 6,675 students. For purposes of this condition, the Traditional Undergraduate Program student headcount shall be defined as the ~~Main~~ **Hilltop** Campus student headcount as defined in Condition 9 plus students studying abroad minus the number of graduate students, professional students, students enrolled in the School of Continuing Studies, non-degree students and students returning for their second degree in nursing, all by headcount (for purposes of Conditions 8 and 28 of this Order, each such student counted under the Traditional Undergraduate Program student headcount being a “Traditional Undergraduate Program student”).

**10A. Commencing in Academic Year 2025-2026, the University shall be permitted to exclude certain undergraduate students enrolled in programs based at the Capitol Campus (each student, a “Capitol Campus Undergraduate Program student”) from the Traditional Undergraduate Program student headcount, even if such students are enrolled in up to two courses each semester that are located on the Hilltop Campus.**

**For Academic Years 2025-26 and 2026-27, the number of Capitol Campus Undergraduate Program students excluded from the Traditional Undergraduate Program student headcount each semester shall not exceed the maximums set forth on the table below:**

<b>Academic Year</b>	<b>Anticipated Capitol Campus Undergraduate Program Student Headcount</b>	<b>Taking One Course Located at the Hilltop Campus</b>	<b>Taking Two Courses Located at the Hilltop Campus</b>	<b>Total Capitol Campus Undergraduate Program Students Taking Courses on the Hilltop</b>
<b>2025-26 (Juniors only)</b>	<b>140</b>	<b>70 (50%)</b>	<b>28 (20%)</b>	<b>98 (70%)</b>
<b>2026-27 (Juniors &amp; Senior)</b>	<b>320</b>	<b>100 (31%)</b>	<b>32 (10%)</b>	<b>132 (41%)</b>

**For Academic Years following 2026-27, the GCP shall establish the number of Capitol Campus Undergraduate Program students permitted to be excluded from the Traditional Undergraduate Program student headcount for subsequent academic years informed by the enrollment patterns for Academic Years 2025-26 and 2026- 27.**

- a) **Capitol Campus Undergraduate Program students who are enrolled in at least one course located at the Hilltop Campus shall continue to be counted as a part of the Hilltop Campus student headcount pursuant to Condition 9, and the University shall remain in compliance with the Hilltop Campus student headcount set forth in Condition 9.**
- b) **Capitol Campus Undergraduate Program students shall reside either in housing provided by the University near the Capitol Campus, or, in their senior year, off campus, except that they shall not be permitted to live in the Georgetown, Burleith, or Foxhall communities. Violations of these restrictions shall be subject to the Code of Student Conduct, and any such Capitol Campus Undergraduate Program student who resides in the Georgetown, Burleith, or Foxhall communities shall also be counted in the Traditional Undergraduate Program headcount set forth in Condition 10.**

- c) The University shall maintain on-campus housing for Traditional Undergraduate Program students consistent with Condition 5, including efforts focused on providing competitive and marketable on-campus housing options for juniors and seniors. As Capitol Campus programs develop and fewer seniors are enrolled in programs located at the Hilltop, on-campus housing available for seniors may be reduced at a gradual and measured manner from current levels reflecting actual shifts in enrollment (or, if need be in any year, increased from the prior year to reflect fewer anticipated seniors at the Capitol Campus); however, at all times for the remainder of the term of the Campus Plan, the University shall maintain on-campus housing for at least 550 Traditional Undergraduate Program students who are seniors. The University shall develop and implement appropriate measures incentivizing rising seniors to choose to live on campus, aimed at achieving an occupancy rate of at least 95% for such beds. If the enrollment and housing report described in Condition 11 reveals that the 95% occupancy target is not met in any semester, the University shall, in consultation with the GCP, work to develop additional strategies and incentives aimed at meeting or exceeding the 95% target for the following and subsequent semesters.**
- d) The University shall provide information on the number of Capitol Campus Undergraduate Program students, including the number of such students who take one or more courses on the Hilltop Campus, as a part of the enrollment and housing report prepared each semester pursuant to Condition 12.**
- e) The University’s student codes of conduct and professionalism and related disciplinary procedures (including the provisions of such policies that the University is required to maintain pursuant to this Campus Plan) shall apply to conduct by all Capitol Campus students occurring in the Georgetown, Burleith, or Foxhall communities as well as on the portions of the Hilltop Campus east of 37th Street. The University shall, in a manner consistent with its policies and procedures, investigate and respond effectively to reports involving Capitol Campus students that occur in the Georgetown, Burleith, or Foxhall communities as well as on the portions of the Hilltop Campus east of 37th Street, in accordance with the provisions set forth in Conditions 14 and 15.**
- f) Subject to reasonable, very limited exceptions, all Capitol Campus Undergraduate Program students (as defined in Condition 10A) shall be prohibited from bringing cars to the Hilltop Campus or parking their cars on the street in Georgetown, Burleith, and Foxhall. Violations of the parking policy shall be part of the Code of Student Conduct. Notices of this parking policy shall be provided to Capitol Campus Undergraduate Students and their parents.**
- g) The University shall provide convenient, free bus transportation between the Hilltop Campus and the Capitol Campus. Such bus service shall utilize the Canal Road entrance/exit of the Hilltop Campus consistent with the requirements of Condition 20. The University shall also make available to Capitol Campus students reduced-rate access to Capital Bikeshare (or other similar bicycle or micromobility service) equivalent to what is currently available to Hilltop Campus students.**
- h) The University shall commit sufficient resources (financial, personnel, intellectual capital, etc.) to successfully implement the commitments described in this Condition 10A.**



## **ATTACHMENT B: CONDITION 12**

12. The University shall provide the GCP, prior to the end of each Spring and Fall semester, a complete report on the student enrollment maximums set forth in Conditions 9 through 11 above. The report shall also contain information on other categories of undergraduate students (as defined under this Campus Plan), and graduate student enrollment. The report shall also contain the number and location of all University-provided student housing as well as progress toward the Housing Commitment set forth in Condition 5 above. The Report shall contain a certificate as to its accuracy signed by the Provost of the University.
- 12A. Should the University exceed any of the enrollment maximums set forth in Conditions 9 through 11 in a given semester, the University shall reduce such enrollment maximum by an equal number of students in a corresponding semester (i.e. if the enrollment maximum is exceeded in the Fall semester, then the corresponding reduction shall be in a subsequent Fall semester) within two years from the end of the semester in which the excess occurred. In the event the enrollment maximum has been exceeded by greater than 25 students, the University shall either implement the enrollment reduction described herein or such other measures as agreed to by the GCP. The University shall document the enrollment reduction in the Report for the semester in which the reduction is implemented.**