

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Shepard Beamon, Development Review Specialist
Maxine Brown-Roberts, Associate Director, Development Review
Radhika Mohan, Deputy Director, Development Review, Historic Preservation and Urban Design RCM

DATE: July 13, 2026

SUBJECT: ZC Case 16-18I – Amendment to the approved Georgetown University Campus Plan to designate the property as a development site for campus life/athletic use and further processing to authorize construction of a non-motorized boathouse at 3500 Water Street NW.

I. RECOMMENDATION

The Office of Planning (OP) has reviewed the proposed amendment to Zoning Commission (ZC) Order No. 16-18 and recommends **approval** of the requested campus plan amendment and further processing to the approved Georgetown University 2017-2036 Campus Plan for the following pursuant to Subtitle X § 101.1.

OP also recommends **approval** of the following requested special exception and variance relief:

- (a) Subtitle C § 1102.4(e) Special exception for education use within the 100-year floodplain, pursuant to Subtitle C § 1102.5 and Subtitle X § 901;
- (b) Subtitle C § 1102.1(a) Special exception for structures located within the 75-foot waterfront setback, pursuant to Subtitle C § 1102.1(g) and Subtitle X § 901;
- (c) Subtitle C § 1102.1(e) Variance from the 25-foot required waterfront setback to be reserved for a public pedestrian and bicycle trail along the waterfront, pursuant to Subtitle X § 1002; and
- (d) Subtitle G § 211.1 Variance from the Green Area Ratio (GAR) requirements.

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 use and development of a new property to be transferred to the Hilltop Campus.

III. APPLICATION-IN-BRIEF (FOR BOATHOUSE ONLY)

Applicant:	Goulston & Storrs for Georgetown University
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Address:	3500 Water Street NW
Zone:	R-3/GT; MU-12
Ward and ANC:	Ward 2; ANC 2E
Legal Description:	Square 1179, Lots 805, 806, 812, 813 and a portion of 35th Street to be closed
Property description:	The site is located along the Potomac River immediately west of and underneath the Key Bridge.
Generalized Policy Map Designation:	<u>Neighborhood Conservation Areas</u> - Neighborhood with little vacant or underutilized land. They are generally residential in character. Maintenance of existing land uses and community character is anticipated over the next 20 years. Where change occurs, it will typically be modest in scale and will consist primarily of infill housing, public facilities, and institutional uses. Major changes in density over current (2017) conditions are not expected, but some new development and reuse opportunities are anticipated, and these can support conservation of neighborhood character where guided by Comprehensive Plan policies and the Future Land Use Map. Neighborhood Conservation Areas that are designated “PDR” on the Future Land Use Map are expected to be retained with the mix of industrial, office, and retail uses they have historically provided. The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods, but not preclude development, particularly to address city-wide housing needs. Limited development and redevelopment opportunities do exist within these areas. The diversity of land uses and building types in these areas should be maintained, and new development, redevelopment, and alterations should be compatible with the existing scale, natural features, and character of each area. Densities in Neighborhood Conservation Areas are guided by the Future Land Use Map and Comprehensive Plan policies <u>Resilience Focus Areas</u> - Areas where future planning efforts are anticipated to ensure resilience to flooding for new development and infrastructure projects, including capital projects, especially in areas within the 100- and 500-year floodplain. In the Resilience Focus Areas, the implementation of neighborhood-scale, as well as site-specific solutions, design guidelines, and policies for a climate-adaptive and resilient city are encouraged and expected. Boundaries shown are for illustrative purposes. Final boundaries will be determined as part of any future analysis for each area

Future Land Use Map Designation:	<u>Parks, Recreation and Open Space (PROS)</u> - This designation includes the federal and District park systems, including the National Parks, such as the National Mall; the circles and squares of the L’Enfant city and District neighborhoods; settings for significant commemorative works, certain federal buildings such as the White House and the U.S. Capitol grounds, and museums; and District-operated parks and associated recreation centers. It also includes permanent open space uses such as cemeteries, open space associated with utilities such as the Dalecarlia and McMillan Reservoirs, and open space along highways such as Suitland Parkway. This category includes a mix of passive open space (for resource conservation and habitat protection) and active open space (for recreation). While included in this category, parks smaller than one acre – including many of the triangles along the city’s avenues – may not appear on the map due to scale. Zoning designations for these areas vary. The federal parklands are generally unzoned, and District parklands tend to be zoned the same as surrounding land uses.
Historic District	Chesapeake and Ohio Canal Historic District; Georgetown Historic District
Historic Landmark	N/A

IV. PROJECT DESCRIPTION

The University proposes constructing a new boathouse on the property to provide the University’s men’s and women’s rowing programs with dedicated facilities and to support training and education both in and out of the water. The proposed two-story building will accommodate double-height space for storage racks for stacked shells on the lower and mezzanine levels, showers and locker rooms, a coach’s office, classroom space, storage, and a multi-purpose room designed to be used for training and team meetings on the second floor, with views to overlook the Potomac River.

The building would be consistent with the building materials approved in the Campus Plan, including the use of stone and a transparent ground floor. Additionally, the building will be designed with Victorian architectural features to complement the Georgetown Historic District and traditional boathouses. The proposed building has been reviewed and received approval from both the U.S. Commission of Fine Arts (CFA) and Old Georgetown Board (OGB).

V. PROPOSED MODIFICATIONS

Campus Plan Amendment

The University proposes an amendment to the 2017 Campus Plan to add the Property to the Hilltop Campus and designate it as a development site for athletic use. The applicant proposes an amendment to Condition #36 to adjust the campus plan boundaries to include the property at 3500 Water Street NW, which the University proposes for education and athletic use with construction of a boathouse, shown as #13 in Figure 1. The condition would update the campus plan boundaries from Exhibit 3I in the former case record of ZC 16-18G to Exhibit 3H in the subject case record ZC 16-18I.

The University currently rents space at the Thompson Boat Center, which offers limited capacity and requires additional coordination for scheduling. To better accommodate the University's rowing program, the Applicant proposes to construct and relocate operations to the new boathouse on the subject property.

The proposed boathouse would not exceed the campus plan's maximum Gross Floor Area of 6,872,122 square feet or the permitted Floor Area Ratio of 1.56, as shown in Exhibit 3G. The University does not propose any changes to the total enrollment approved under the campus plan.

Additionally, the applicant proposed an amendment to Condition #6 to the Loading Management Plan (LMP) to extend adherence with the LMP for the life of the project.

VI. OP ANALYSIS

A. FURTHER PROCESSING

Zoning Commission approval of the development of individual buildings or uses within the campus plan is referred to as further processing. As part of a Campus Plan's further processing application, the Commission may review requests for relief from specific provisions of the Zoning Regulations. Per Subtitle X § 101.10 Campus Plans, the further processing of specific buildings, structures, and uses within an approved campus plan shall be processed as a special exception.

Subtitle X Section 101 of the Zoning Regulations provides standards for reviewing university campus plans and further processing applications. The Office of Planning's analysis of the current campus plan modification and further processing application against those criteria is below.

101.1 Education use by a college or university shall be permitted as a special exception subject to review and approval by the Zoning Commission after its determination that the use meets the applicable standards and condition of this chapter.

Georgetown University is an educational use, for which a Campus Plan was approved in ZC Case 16-18.

101.2 The uses shall be located so that they are not likely to become objectionable to neighboring property because of noise, traffic, parking, number of students, or other objectionable conditions.

The proposed boathouse is located along the waterfront, where there is limited activity and development. It would be next to three townhomes to the west. There could be an increase in noise during construction of the facility, but the use is unlikely to generate excessive noise post-construction, as the building will be used for storage and educational use, while

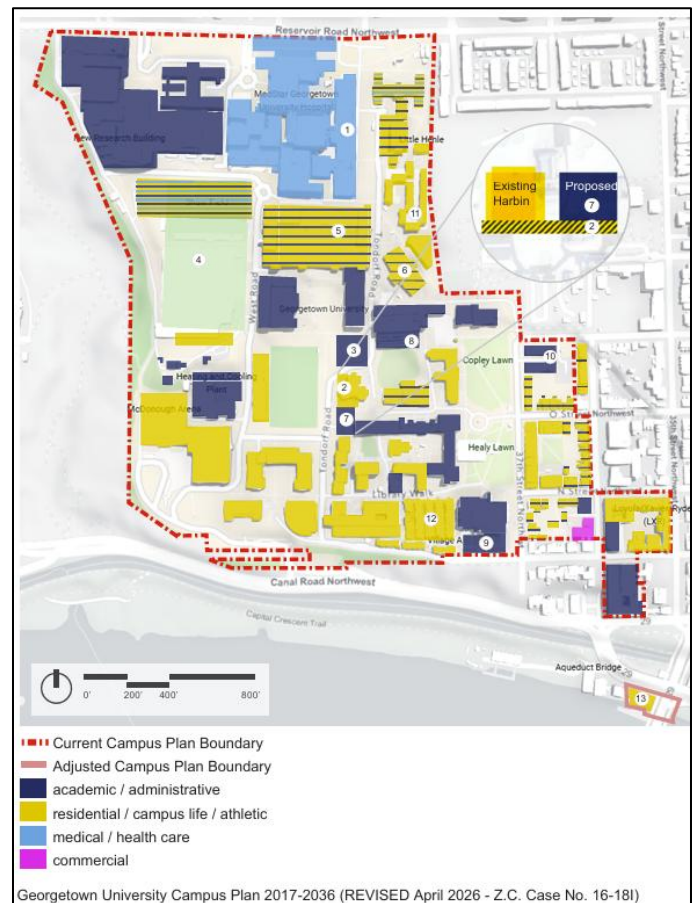


Figure 1: Existing/Proposed Campus Plan Boundaries

recreational activity will occur on the river. There will be no increase in the total enrollment of students. There will be no on-site parking, and the use is not anticipated to increase traffic. The site is within walking distance to the campus, so it is not expected for students to drive to the site.

101.3 Any commercial use customarily incidental to a university use in an R, RF, or RA zone, or as an adjunct use to a university building, shall be subject to the following conditions:

Not applicable to this application.

101.4 The campus plan process shall not serve as a process to create general commercial activities or developments unrelated to the educational mission of the applicant or that would be inconsistent with the Comprehensive Plan.

The application proposes no commercial activities or developments.

101.5 The following development standards shall apply to the maximum total density of all buildings and structures on the campus in an R, RF, RA, or RC-1 zone:

TABLE X § 101.5: MAXIMUM TOTAL DENSITY OF ALL BUILDINGS AND STRUCTURES

TABLE X § 101.5: MAXIMUM HEIGHT AND TOTAL FLOOR AREA RATIO OF ALL BUILDINGS AND STRUCTURES		
Zone	Maximum Height (Feet)	Maximum Floor Area Ratio
R and RF	50	1.8
RA-1	50	1.8
RA-2	60	1.8
RA-3, RA-4, and RA-5	90	3.5

The approved Campus Plan establishes a maximum FAR for the campus of 1.56. An FAR of 1.36 is proposed in this application, consistent with Zoning Regulations and the Campus Plan.

101.6 Because of permissive increases as applicable to normal bulk requirements in the low-density zones regulated by this title, it is the intent of this subsection to prevent unreasonable campus expansion into improved low-density zones.

The proposed boathouse would not result in an expansion into low-density zones.

101.7 In calculating floor area ratio (FAR), the land area shall not include public streets and alleys, but may include interior private streets and alleys within the campus boundaries.

The FAR calculation included in the campus plan did not include public streets or alleys, as the applicant previously applied for and was approved for a public street closure on the site.

101.8 As a prerequisite to requesting a further processing for each college or university use, the applicant shall have submitted to the Zoning 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 University previously submitted a complete Campus Plan application, which was approved by the Zoning Commission on December 1, 2016 (ZC Order 16-18). This application amends the Campus Plan to add the Property as a development site within the campus boundaries.

- 101.9 The further processing of specific buildings, structures, and uses within an approved campus plan shall be processed as a special exception unless the campus plan approval was included in an order granting a first-stage planned unit development (PUD) for the campus, in which case the further processing shall be in the form of second-stage planned unit development applications filed consistent with the conditions of the approved campus plan/PUD.*

The applicant is requesting a special exception for future processing of the proposed boathouse. Georgetown University is not subject to a PUD.

- 101.10 Within a reasonable distance of the college or university campus, and subject to compliance with Subtitle X § 101.2, the Zoning Commission may also permit the interim use of land or improved property with any use that the Zoning Commission may determine is a proper college or university function. The land need not be included in the campus plan. 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 Zoning 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.*

The application does not request the interim use of land for university use and it does not propose the relocation of a major development site to an off-campus location.

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

The proposal is not inconsistent with the Comprehensive Plan, including when reviewed through a racial equity lens. Analysis of relevant policies from the Land Use, Environmental Protection, Urban Design, Parks, Recreation and Open Space, and Education Citywide Plan Elements, and the Near Northwest Area Element, as well as the Comprehensive Plan's land use maps, is provided below.

- 101.12 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 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 approved Campus Plan anticipates an overall FAR of 1.56 maximum, with zoning permitting a maximum FAR of 1.8. The additional gross floor area of the proposed student housing would result in an FAR of 1.36, which would be within the FAR limit for the campus as a whole.

- 101.13 Pursuant to Subtitle Z § 405.1, as soon as the application is accepted, the Office of Zoning shall refer the application to the Office of Planning, the Department of Transportation, and the Department of Energy and Environment for review and written reports.*

The application has been submitted for review to the aforementioned agencies. As of the date of this report, the record contains no reports from other District agencies.

101.14 Approval of a campus plan shall be based on the determination by the Zoning Commission that the application 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 Maps, subject to the special conditions specified in this section.

It is the intent of the regulations that university uses should be compatible with their surroundings, especially in waterfront, parks, and historic areas. In this case, the proposed boathouse use is consistent with uses on the Potomac waterfront. Further, the applicant has designed the building to withstand potential flood risks in the 100-year floodplain. Therefore, there should be no significant impacts on nearby properties, the general public, or the river.

101.15 Small deviations from plans approved under further processing that are determined necessary by the Zoning Administrator for compliance with life, safety, or building codes, may be permitted without an amendment to a further processing provided the deviation does not result in an increase in gross floor area of more than four-hundred and fifty square feet (450 sq. ft.) and the addition shall only be used for purposes of ingress, egress, or handicap access.

OP does not anticipate that deviations from the plans for the building would be required should the application be approved by the Commission, but does not oppose such flexibility.

101.16 A further processing of a campus building shall not be filed simultaneously with a full campus plan application. However, an amendment to an approved campus plan may be considered simultaneously with the further processing if determined necessary by the Zoning Commission.

Pursuant to this section, the applicant requests a campus plan amendment and further processing.

B. SPECIAL EXCEPTION AND VARIANCE RELIEF

The applicant requests zoning relief from the following areas:

- i. A special exception for education use within the 100-year floodplain, pursuant to Subtitle C § 1102.5:
- ii. A special exception from the 75-foot waterfront setback to allow 0 feet, pursuant to Subtitle C § 1102.1(g);
- iii. An area variance for the 25-foot waterfront setback of Subtitle C § 1102.1(e) to allow no setback; and
- iv. An area variance from the GAR requirements of Subtitle G § 211.1

Special Exception Review – Subtitle C § 1102: Education Use in 100-year Floodplain

The property is located in the waterfront and therefore subject to the regulations pursuant to Subtitle C Chapter 11 Waterfront regulations. The applicant requests to allow education uses in the floodplain pursuant to the following conditions:

1102.4 The following uses shall be permitted as a special exception within a one hundred (100)-year floodplain, if approved by the Board of Zoning Adjustment under Subtitle X, Chapter 9 and subject to the conditions in Subtitle C § 1102.5:

(e) Education;

1102.5 The following conditions shall apply to any application for a special exception use under Subtitle C § 1102.4:

(a) The application shall include an analysis that provides the following:

- 1) A site plan showing the one hundred (100)-year floodplain boundaries and base flood elevations for the property that is certified by a registered professional engineer, architect, landscape architect, or other qualified person;*

The applicant has provided plans demonstrating the 100-year floodplain boundaries and elevation in Exhibit 13A1.

- 2) A description of how the project has been designed to meet applicable flood-resistant design and construction standards that is certified by a registered professional engineer, architect, landscape architect, or other qualified person;*

The applicant states that the project will incorporate flood-resistant elements, including locating all non-storage program areas above the design flood elevation, locating all mechanical equipment in a well within the roof, and designing the lower-level storage to wet floodproofing standards that allow for floodwaters to enter the space.

- 3) An evacuation plan that describes the manner in which the property would be safely evacuated before or during the course of a one hundred (100)-year flood event; and*

The applicant has provided plans demonstrating the evacuation plan in Exhibit 13A1.

- 4) A description of how the proposed use would not result in any adverse impacts to the health or safety for the project's occupants or users due to the proposed use's location in the floodplain; and*

Per the applicant, the Boathouse will be used by student athletes and coaches who are well versed in water safety. Therefore, the Project's uses will not result in any adverse impacts to the health or safety for the Project's occupants or users due to the proposed use's location in the floodplain.

Special Exception Review – Subtitle C § 1102: 75-foot Waterfront Setback

1102.1 A waterfront setback to any building or structure shall be provided in accordance with the following provisions:

- (a) The waterfront setback shall be a minimum of seventy-five feet (75 ft.) in depth, except as noted in individual zones;*

- (f) The Board of Zoning Adjustment may approve as a special exception a waterfront setback of less than amount required in Subtitle C § 1101.1(a), pursuant to the general special exception criteria of Subtitle X and the criteria of Subtitle C § 1102.1(g); and*

The applicant has requested special exception relief from the 75-foot waterfront setback to have a 0-foot setback.

- (g) The following criteria shall be considered by the Board of Zoning Adjustment when evaluating an application for a waterfront setback less than otherwise required and when evaluating a special exception use in the MU-11 zone:*

- (1) The buildings, structures, and uses will enhance the visual and public recreational opportunities offered along the waterfront;*

The site is currently vacant. The proposed building will be designed to be consistent with the campus plan architectural guidelines and with respect to the surrounding historic features, while the proposed use will be complementary to the recreational activities encouraged on the Potomac River.

- (2) *Buildings, structures, and uses on land will be located and designed to minimize adverse impacts on the river and riverbank areas;*

Landscaped areas have been designed to maximize the amount of stormwater that can be managed on site to the extent practicable given the size, contextual design, and operational limitations on the property. The site is entirely located in the floodplain; therefore, the applicant proposes designing the building with limited ground-floor uses primarily for storage and more activity on the upper level above the floodplain elevation.

- (3) *Buildings, structures, and uses on, under, or over water will be located and designed to minimize adverse impacts on the river and riverbank areas;*

There are no buildings proposed over, on, or under the water. The applicant does propose a dock with public access over the water; however, this is a structure consistent with other boating facilities along the river and should not have adverse impacts on the river.

- (4) *All structures and buildings will be located so as to not likely become objectionable to surrounding and nearby property because of noise, traffic, or parking, and so as not to limit public access along or to the waterfront, other than directly in front of the principal building or structure of a boathouse, marina, yacht club, or other water-dependent use;*

The building will be designed to provide a 15-foot side setback to provide public access to the waterfront. The use is not anticipated to produce an excessive amount of noise. The property would not accommodate on-site parking; however, there will be off-site parking for staff and students are expected to walk or bike to the site. Further, there would be a dedicated loading area for shells for away meets.

- (5) *Impervious surfaces will be minimized, and buildings and all other impervious surfaces will be designed and sited to prevent surface storm water run-off directly into the river;*

The applicant states that the project will be in compliance with all applicable District stormwater management requirements.

- (6) *Accessory or non-accessory parking spaces, including the location of entrances and exits and any screening or fences, will be designed to minimize visual or physical impacts on adjacent parkland and the waterfront; and*

The project does not include on-site parking spaces.

- (7) *Emergency access will be provided to any buildings, structures, or other space devoted to active public use.*

The applicant states emergency access will be accommodated in accordance with District requirements.

Special Exception Review – Subtitle X § 902

901.2 *The Board of Zoning Adjustment is authorized under § 8 of the Zoning Act, D.C. Official Code § 6-641.07(g)(2), to grant special exceptions, as provided in this title, where, in the judgment of the Board of Zoning Adjustment, the special exceptions:*

(a) Will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps;

The waterfront regulations and the 100-year floodplain are intended to ensure public safety and to guide compatible development in areas subject to flooding. Educational uses are permitted within the floodplain by special exception when the criteria of C § 1102.5 are met. The Applicant has satisfied these requirements by providing a building design that complies with applicable flood-resistant construction standards and by demonstrating appropriate safety measures and operational plans for building occupants.

Relief from the 75-foot waterfront setback is similarly permitted under C § 1102.1(g), which OP finds the proposal meets, including maintaining physical public access to the waterfront. While the setback is intended to preserve open space along the river, this portion of the waterfront already contains existing development within and adjacent to the setback. The proposed boathouse use is compatible with the riverfront context and its natural areas.

For these reasons, OP finds that granting the special exception would be in harmony with the intent of the waterfront regulations and the broader zoning framework.

(b) Will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps; and

The proposal should not adversely impact neighboring properties, as the boathouse will be used primarily for river-related activities consistent with the operations of the adjacent Potomac Boat Club and nearby Washington Canoe Club. Although three single-family townhomes are located nearby, long-term disturbances are not anticipated because the boathouse use already exists in the immediate area and is functionally similar to existing waterfront activity.

The proposed building would provide an eight-foot side yard with bioretention planters buffering the closest townhome, and the structure would remain within the permitted 45-foot height limit. As noted above, no on-site parking is proposed; a designated loading area would be provided; students are expected to bike or walk to the site; and staff parking would occur off-site. As a result, the use is not expected to generate excessive or new traffic patterns.

The boathouse operations are also unlikely to produce noxious odors or unnecessary noise, given the nature of the use and its consistency with existing waterfront activity. Therefore, OP finds that granting the special exception should not impose undue impacts on adjacent properties.

(c) Will meet such special conditions as may be specified in this title.

OP does not recommend any special conditions.

Area Variance Review – Subtitle X § 1002

Subtitle C § 1102.1(e) requires a 25-foot waterfront setback area, for the full width of the lot along the water, shall be reserved for a public pedestrian and bicycle trail along the waterfront. In this case, the applicant is requesting to reduce the setback to 0 feet, resulting in this relief request.

Additionally, Subtitle G § 211.1 requires a Green Area Ratio (GAR) of 0.30 in the MU-12 zone. The applicant proposes 0.08 and requests variance relief.

i. Extraordinary or Exceptional Situation or Condition Resulting in Peculiar and Exceptional Practical Difficulties To the Property Owner

The Applicant identifies several physical and contextual factors that together create an extraordinary condition for the subject property. The site is irregularly shaped, shallow in depth, and entirely within the 100-year floodplain. It slopes downward toward the river with an approximately nine-foot grade change from north to south. In addition, the Key Bridge directly abuts the property, further constraining the buildable area and limiting the achievable building height.

Although not located on the subject site, surrounding elements—including the Key Bridge columns, the Potomac Boat Club, and the Potomac Aqueduct—are situated within the 25-foot waterfront setback. These existing structures function as fixed obstructions that limit the ability to establish reserved open space for a public pedestrian and bicycle trail along the waterfront. Within this constrained context, meeting the University’s programmatic needs while also complying with the GAR requirement presents a practical challenge.

The Applicant explored permeable surfacing in other areas of the site, including the 15-foot ramp, but determined such treatments to be infeasible. To store the required number of shells onsite in a covered structure, replacing the current off-site rented storage, the building footprint must extend into the 25-foot setback. Without the requested variance relief, the building area would be significantly limited, making it difficult to accommodate the necessary number of shells and to orient them for direct access to the river, which is essential for this water-dependent use.

These combined physical constraints and operational needs create peculiar and exceptional practical difficulties for the Applicant in developing the site consistent with the University’s rowing program requirements.

ii. No Substantial Detriment to the Public Good

It is unlikely the granting of the variances would result in detriment to the public good. Boating and aquatic recreational use is common in the area. The requested variance from GAR should not impact the neighboring properties, as the applicant will provide an 8-foot-wide landscaping and bioretention feature between the boathouse and the adjacent townhomes. There are no other properties directly abutting the property to the north, south or east.

As stated above, there are existing obstructions in the 25-foot setback, including the Key Bridge column which directly abuts the property. These obstructions heavily reduce the potential for future waterfront trail development directly abutting the river in this particular area. It is unlikely that having the building in the setback would significantly hinder future trail development. The use will continue to provide public access to the river via the 15-foot ramp to the east of the building.

iii. No Substantial Impairment to the Intent, Purpose, and Integrity of the Zoning Regulations

The requested area variance relief should have no substantial impairment to the intent, purpose and integrity of the Zoning Regulations. The relief requested should not result in significant

impacts on light and air, overcrowding of the property, or increased traffic or parking. The proposal otherwise complies with the required density, height, yards and lot occupancy.

C. 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 3E](#). The proposal would, on balance, not be inconsistent with the Comprehensive Plan, the Generalized Policy Map (GPM) or the Future Land Use Map (FLUM).

The GPM designates the site of the proposed boathouse and campus expansion as a Neighborhood Conservation Area and is within a Resilience Focus Area. The site is undeveloped and is within a historic district; therefore, any new development is subject to review by the Old Georgetown Board and the Commission of Fine Arts, both of which have reviewed the proposal. In Neighborhood Conservation Areas, where change occurs, it should consist primarily of infill housing, public facilities, or institutional uses. The diversity of land uses and building types in these areas should be maintained, and new development should be compatible with the existing scale, natural features, and character of each area. The site is fully within the 100-year floodplain, and the applicant has used design strategies to mitigate flood risks and will incorporate sustainable stormwater management practices and reduce sedimentation into the Potomac River.

The FLUM designates the site as Parks, Recreation, and Open Space (PROS). Generally, these areas are to remain unbuilt to preserve natural and park lands; however, the proposed use is consistent with the FLUM designation as it is ancillary to applicable recreational activities on the Potomac River and will be designed to protect the natural features of the river.

The proposal would also not be inconsistent with the Citywide Elements, particularly the Land Use, Environmental Protection, Parks, Recreation and Open Space, Educational Facilities and Urban Design. The site is within the Near Northwest Area Element and would address policies related to university campuses.

Land Use Element

Policy LU-1.1.1: Future Planning Analysis and Resilience Focus Areas

Policy LU-1.1.2: Resilience and Land Use

Policy LU-1.2.8: New Waterfront Development

Policy LU-1.2.9: Public Space Design

Policy LU-1.3.8: Large Sites and the Waterfront

Policy LU-2.3.5: Institutional Uses

For areas within the 100- and 500-year floodplain, future planning efforts are intended to guide resilience to flooding for new development. Resilience focus areas will explore watershed resilience to encourage the implementation on a neighborhood scale, as well as site-specific solutions, design guidelines, and policies for a climate-adaptive and resilient District. New waterfront development shall actively address flood risk and incorporate adaptive siting and design measures that can withstand a 100-year flood event or stricter standards as prescribed by District law while improving quality of life in neighborhoods, which the applicant has addressed. Waterfront sites should be used

for water-focused recreation with activities that are accessible to both sides of the river and should further be used to enhance the physical and environmental quality of the rivers.

Environmental Protection

Policy E-1.1.6: Floodplains, Waterfronts, and Other Low-Lying Areas

Policy E-2.2.1: River Conservation

Policy E-2.3.1: Preventing Erosion

Policy E-2.3.3: Reducing Sedimentation

Policy E-4.4.1: Mitigating Development Impacts

Consistent with the Federal Elements of the Comprehensive Plan, activities within floodplains, waterfronts, and other low-lying areas that could pose public health or safety hazards in the event of a flood are prohibited. The proposed boathouse use should not pose health or safety hazards, as it will be designed to mitigate flooding. Particular attention should be given to eliminating toxic sediments, improving river edges to restore vegetation and reduce erosion, enhancing wetlands and wildlife habitats, creating new wetlands, and reducing litter. Public and private construction activities should not result in soil erosion or the creation of unstable soil conditions. The applicant has stated that there will be stormwater management on the site, including bioretention planters, in an effort to reduce soil erosion and sedimentation deposits in the river. Future development should mitigate impacts on the natural environment and anticipate the impacts of climate change, resulting in environmental improvements wherever feasible. Construction practices that would permanently degrade natural resources without mitigation should not be allowed. The proposal should not degrade the natural resources or features along the river, as the primary use of the building will be to store rowing and boating equipment along with the other spaces affiliated with aquatic recreation.

Parks, Recreation and Open Space

Policy PROS-1.3.6: Compatibility with Adjacent Development

Policy PROS-3.1.6: Compatibility with Parklands

Policy PROS-3.2.5: Water-Oriented Recreation

Policy PROS-3.2.6: River Facilities

The PROS element supports design and management of park activities and facilities, including recreation centers, in a way that is compatible with nearby residential and commercial uses. It also supports designing private development adjacent to the edges of open spaces and parks to be compatible with these parklands and improve park access and safety. The element aims to provide for a variety of water-oriented activities—including fishing, boating, kayaking, and paddleboarding—on the District’s rivers. The applicant has coordinated with federal and agency partners in a further effort to provide equitable access to the river, recreational equipment, educational space, and other amenities through the University. These amenities must be equitably distributed along the rivers and easily accessible from nearby neighborhoods.

Historic Preservation

Policy HP-2.5.3: Compatible Development

This element aims to preserve the important historic features of the District while permitting compatible new infill development. Within historic districts, respect the established form of

development as evidenced by lot coverage limitations, height limits, open space requirements, and other standards that contribute to the character and attractiveness of those areas. Although there are no immediate surrounding historic buildings, the property is within a historic district, and the applicant states that the building will be designed to fit within the context of its waterfront location and adjacency to the Key Bridge, to be in scale with the historic context through sensitive siting and design, and in keeping with the architectural guidelines of the campus plan.

Urban Design

Policy UD-1.2.1: Respecting Natural Features in Development

Policy UD-1.3.2: Waterfront Public Space

Policy UD-1.3.3: Innovative and Resilient Waterfront Development

Policy UD-1.3.4: Resilient Waterfront

The Urban Design element supports respect and preservation of the natural features of Washington, DC's landscape as part of new development. It also encourages developing public gathering spaces along the Potomac and Anacostia waterfronts, including boating and swimming facilities. The design of new waterfront development projects should respond to the unique opportunities and challenges of being on the water, including flood-resilient building and site design methods. New buildings should be carefully designed to consider their appearance from multiple public vantage points along the Anacostia and Potomac shorelines, including from the shoreline and from the water. The design of each waterfront site should respond to its natural context and work with the natural processes of tidal rivers to be resilient to flooding from storm surge, sea level rise, and other sources. All buildings are designed to accommodate and mitigate flooding and to restore ecological systems and natural shorelines.

Educational Facilities

Policy EDU-3.3.2: Balancing University Growth and Neighborhood Needs

Policy EDU-3.3.3: Universities as Large Landowners and Campus Plan Requirements

Policy EDU-3.3.11: Access to Recreational, Educational, and Cultural Opportunities

This element encourages 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, and economy, and that is also consistent with and supports community improvement and neighborhood conservation objectives. This element also discourages university actions that would adversely affect the character or quality of life in surrounding residential areas. The proposed institutional development should not result in a decline in the quality of life in the surrounding area.

Campus plans should include provisions that respect neighbors and neighboring property and ensure that potentially objectionable impacts such as noise, traffic, number of students, or other similar conditions are addressed. The proposal should not result in negative impacts on noise, traffic, or an increase in student enrollment. The facility should provide access by local neighborhoods to university offerings, in this case, for riverfront recreational opportunities.

Near Northwest Area

Policy NNW-2.4.1: Georgetown and Foggy Bottom Waterfront

The Near Northwest Area Element encourages providing a continuous connection along the Potomac River waterfront in Georgetown and Foggy Bottom, including paths for pedestrians and bicyclists, fountains, seating areas, landscaping and open space, lighting, public access to the water, *new non-motorized boating facilities*, and fishing areas.

D. RACIAL EQUITY ANALYSIS

The applicant has 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 boathouse nor the boundary expansion would result in the direct displacement of existing residents or businesses as there is no residential use affiliated with this proposal.
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 as the boathouse should not result in any significant economic, social or cultural changes.
Housing	Will the action result in changes to: ▪ Market Rate Housing ▪ Affordable Housing ▪ Replacement Housing	The request would not negatively impact existing market rate or affordable housing. There are very few homes in the area, and new housing is unlikely to occur in the floodplain.
Physical	Will the action result in changes to the physical environment such as: ▪ Public Space Improvements ▪ Infrastructure Improvements ▪ Arts and Culture ▪ Environmental Changes ▪ Streetscape Improvements	The proposal should not result in negative impacts on the physical environment. The applicant has stated that the proposal will lead to public space and streetscape improvements along Water Street and the site will incorporate stormwater management where there was none previously.
Access to Opportunity	Is there a change in access to opportunity? ▪ Job Training/Creation Healthcare	The proposal should not appear to significantly impact employment opportunities.

Factor	Question	OP Response
	▪ Addition of Retail/Access to New Services	
Community	How did community outreach and engagement inform/change the zoning action?	The Applicant's filings indicate necessary community discussions that took place, including meeting with both ANCs 2E and 3D, who both voted in support of the proposal as filed to the record.

VII. SUMMARY

OP finds the site suitable for educational and aquatic life/recreational uses to allow a permanent facility for the Georgetown University rowing team. Construction of the building in the floodplain and waterfront setback should not result in negative impacts on the surrounding properties or the river. The applicant has designed the building to withstand potential impacts from flooding, while the exterior will complement the historic district architectural details and materials. The site will provide direct access to the river for both the University and the public. The building would not obstruct a bike or pedestrian path or trail. Therefore, OP recommends approval of the proposed amendments to Conditions 6 and 36, further processing for the construction of a boathouse, and the requested areas of zoning relief.

VIII. AGENCY COMMENTS

There is a letter from DDOT in Exhibit 14 stating no objection to the approval of this Campus Plan modification with the following condition included in the Zoning Order: Implement the Loading Management Plan (LMP) for the life of the project, unless otherwise.

At Exhibit 3I are memos from the Commission of Fine Arts noting approval of the concept design; and from the Old Georgetown Board noting no objection to the concept design.

IX. ANC COMMENTS

ANCs 2E and 3D have submitted letters of support in Exhibits 9 and 11, respectively.

X. COMMUNITY COMMENTS

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

XI. ATTACHMENTS

ATTACHMENT A: Condition 36

ATTACHMENT B: Condition 6

ATTACHMENT A: CONDITION 36

36. The Campus Plan boundary shall be that boundary depicted on **Ex. 3H of the record in Z.C. Case No. 16-18I** ~~Ex. 3I of the record in Z.C. Case No. 16-18G.~~

ATTACHMENT B: CONDITION 6

6. Loading Management Plan. **For the life of the Project**, the University shall adhere to the loading management plan set forth as Attachment C of Exhibit [13D] of the Record.