

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Shepard Beamon, Development Review Specialist
^{MBR} Maxine Brown-Roberts, Associate Director Development Review

DATE: September 14, 2026

SUBJECT: ZC Case 16-18J – Public Hearing Report for a Modification Without a Hearing to the 2017-2036 Georgetown University Hilltop Campus Plan

I. RECOMMENDATION

The Office of Planning (OP) has reviewed the requested modifications to Conditions 10 and 11 and to add a new Condition 12B to Zoning Commission (ZC) Order No. 16-18, 2017-2036 Georgetown University Hilltop Campus Plan (Campus Plan) and recommends **approval** as follows:

(a) Traditional Undergraduate Program (TUP) Enrollment:

1. Modification to Condition 10 to allow for a 100-student increase in the Traditional Undergraduate Program enrollment cap; and
2. New Condition 12B to create a mechanism that will scale back the increase if the number of students living in the neighborhoods surrounding the Hilltop Campus.

(b) Medical Student Program Enrollment:

1. Modification to Condition 11 to allow for an 80-student increase in the Medical Student Program over a four-year period.

II. BACKGROUND

The Georgetown University Hilltop Campus Plan is a twenty-year plan for the University approved in December 2016, with subsequent modifications and further processing applications. In this filing, the University is requesting modifications to conditions related to the Campus Plan enrollment totals.

III. APPLICATION-IN-BRIEF

Applicant:	Georgetown University “University” represented by Goulston & Storrs
Address:	Georgetown University Hilltop Campus
Zone:	R-3/GT; MU-3A; MU-4
Ward and ANC:	Ward 2, ANC 2E; Ward 3, ANC 3D

Legal Description:	Square 1222, Lots 62, 801, and 802; Square 1223, parts of Lots 65, 66, and 67, and Lots 86, 807, 808, 809, 810, 812, 815, 826, 827, 831, 834, 843, 846, 847, 852, 853, 855, 857, and 858; Square 1226, Lots 94, 95, 96, 97, 98, 99, 100, 101, 105, 106, 107, 108, 803, 804, 806, 811, 812, 813, and 814; Square 1248, Lots 150, 151, 152, 153, 154, 155, 156, 157, 160, 161, 162, 800, 801, 802, 804, 806, 829, 830, 831, 834, and 835; and Square 1321, Lots 811, 815, 816, 821, 823, 824, 825, 826, 828, 829, 830, 831, 832, 833, 7000, 7001, 7002, 7003, 7004, 7005, 7006, 7007, and 7008
Property size:	104 acres approximately
Generalized Policy Map Designation:	Institutional Uses and Neighborhood Conservation Area
Future Land Use Map Designation:	Institutional and Moderate Density Residential
Historic District	Georgetown Historic District; Georgetown Visitation Convent and Preparatory School; Glover-Archbold Park
Historic Landmark	Astronomical Observatory-Georgetown Univ.; Healy Hall-Georgetown Univ.; Old North-Georgetown Univ.; Capital Traction Co. Union Station

IV. PROPOSED MODIFICATIONS

Z § 703 CONSENT CALENDAR – TECHNICAL CORRECTIONS TO ADOPTED RULES AND MODIFICATIONS WITHOUT HEARINGS TO CONTESTED CASE ORDERS AND PLANS

*703.6 For the purposes of this section, a “modification without hearing” is a modification in which impact may be understood without witness testimony, including, but not limited to **a proposed change to a condition in the final order**, a change in position on an issue discussed by the Commission that affected its decision, or a redesign or relocation of architectural elements and open spaces from the final design approved by the Commission. Determination that a modification can be approved without witness testimony is within the Commission’s discretion. A request to add or change a zoning map designation to an approved planned unit development shall not be considered without a hearing.*

Modification to Traditional Undergraduate Program Headcount

Condition 10 states:

- 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 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”).

The Applicant is requesting to amend Condition 10 (see Attachment A) to increase the Traditional Undergraduate Program headcount from 6,675 to 6,775, an increase of 100 students, for the Hilltop Campus 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.

The University states that since the approval of the Campus Plan, they have worked to manage the impacts of the Traditional Undergraduate Program students on the surrounding neighborhoods through investments in on-campus housing such as the construction of Hayden and Byrnes Halls (approved in Z.C. Case No. 16-18D), which delivered additional student housing for juniors and seniors, exceeding the 244-bed requirement five years prior to the deadline set forth in Condition 5 of the Campus Plan. This increase in housing slots, along with other factors such as the capacity created in other residence halls, would allow for the requested increase to be absorbed. The University also provides other options to attract and encourage students to live on campus for their full undergraduate tenure in addition to undertaking measures to mitigate the impacts of students who live off campus.

In addition to the on-campus housing, the University also proposes additional policies to encourage students to remain on campus for a fourth year, which may include, but not be limited to the following:

- Offering a two-year housing assignment for rising juniors, providing certainty and continuity in their housing assignments;
- Meal plan subsidies;
- Fee rebates for early housing commitments; and
- Preferential housing assignments.

Along with the proposed increase, the University is offering a contingency plan, if the proposed on-campus housing and incentives do not work as planned. The University proposes a reporting mechanism that would reverse the increase to the original headcount to 6,675 in the case there is an increase above 970 students living in off-campus housing in the surrounding neighborhoods (Georgetown, Burlieth, and Foxhall). The University proposed adding a new Condition 12B (see Attachment C) to effectuate the the reporting mechanism.

If the number reported in the Spring 2028 semester Enrollment and Housing Report exceeds 970 students, the TUP student headcount maximum would be reduced by 25 students for the 2028-2029 academic year and by an additional 25 students in the Spring 2029 semester if the maximum continues to exceed 970, and would be similarly evaluated in subsequent academic years. When the TUP Maximum has been reduced and the number of Traditional Undergraduate Program students living in the Neighborhoods reported in the Spring semester Enrollment and Housing Report no longer exceeds 970 students, the TUP Maximum may be increased by 25 students each year that compliance with the 970 student metric is achieved, up to the TUP Maximum of 6,775 students.

The University states that they continue to seek innovative ways to lessen the burden of students on surrounding neighborhoods and has implemented parking enforcement and restrictions on parking in the neighborhood utilizing:

- A communications campaign to increase awareness of the parking prohibition among undergraduate students and their families by consistent and continued messaging throughout a student's time at Georgetown;
- A schedule of sanctions for violations of the parking prohibition. The sanctions are designed to align with those applicable to other neighborhood-related violations addressed through the Code of Student Conduct;
- An enforcement program that will utilize License Plate Reader (LPR) technology and DMV registration data associated with student addresses, following student acknowledgment of the prohibition and notice of the use of registration information for enforcement purposes, to identify vehicles associated with undergraduate students parked within the prohibited areas of Burleith, Foxhall, and Georgetown.

OP believes that with the additional on-site student housing, housing policy, and parking enforcement, the University should be able to adequately accommodate the requested increase in the TUP headcount and supports the proposed modification to Condition 10 and the new Condition 12B.

Modification to Medical Student Program Headcount

Condition 11 states:

11. During the term of Campus Plan, the Medical Student Program headcount shall not exceed 830 students. For purposes of this condition, the Medical Student Program headcount shall be defined as all students enrolled in the Doctor of Medicine (MD) degree program who are registered in at least one course on the Main Campus.

Condition 11 caps the Medical Student Program at a maximum of 830 students. The University states that they are currently at the maximum number of students and requests an increase to 910, an increase of 80 students. The University proposes an enrollment increase in the Medical Student Program at the Hilltop Campus, which is currently at its maximum. The proposed increase is in response to recent federal administration actions and to address the widening national physician shortage. The proposed increase would begin with 850 students in the academic year beginning in Fall 2027, 870 students in the academic year beginning in Fall 2028, and 890 students in the academic year beginning in Fall 2029. To minimize the impact of these increases, the University would augment existing off-campus policies to ensure that the increases would not cause any objectionable consequences. New policies would include:

- New student orientations around university and community expectations for off campus living;
- A structured student conduct process, including sanctions, for noise, trash, recycling, and property maintenance issues as well as reporting local addresses; and
- A requirement to register vehicles with the University.

Further, to avoid impacts on neighborhood parking the would provide on-campus parking spaces for medical students equal to the incremental increase in enrollment. These spaces would be provided from the University's parking inventory that is currently below the Campus Plan parking cap.

The requested modification to Condition 11 is at Attachment 11.

V. COMPREHENSIVE PLAN

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 Hilltop Campus area as Institutional Uses, which represents colleges and universities. Change and infill can be expected on each campus consistent with campus plans. The GPM also designates smaller surrounding areas as Neighborhood Conservation Areas with little vacant or underutilized land that is 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. There is no new construction proposed as part of this application.

The FLUM designates this area as Institutional, which includes land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions. Surrounding areas are designated Moderate Density Residential (MDR), which includes neighborhoods generally, but not exclusively, for rowhouses as well as low-rise garden apartment complexes. MDR 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).

The proposal would also not be inconsistent with the Educational Citywide Element, specifically:

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-3.3.4: Student Housing

Near Northwest Area Element

The University is within the Near Northwest Area Element and would address policies related to university campuses.

Policy NNW-1.1.4: Nonprofits and Private Service Organizations

Policy NNW-1.1.7: Student Housing

The University has increased on-campus student housing in order to reduce University impacts on the housing stock in adjacent neighborhoods. The Educational Elements encourage growth and development to local universities that is consistent with and supports community improvement and neighborhood conservation objectives and discourage university actions that would adversely affect the character or quality of life in surrounding residential areas. The University proposes new policies to monitor and regulate the number of students residing in surrounding neighborhoods and to reduce negative impacts to surrounding residential areas.

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...*”. Using the Commission’s Racial Equity Tool, the proposed modifications would not appear to significantly advance or impede the stated policies of the Comprehensive Plan related to racial equity since the University proposes policies to mitigate potential adverse impact on neighboring properties. The modifications should not 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?	The proposed modification should not result in the direct displacement of existing residents or businesses.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	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: ▪ Market Rate Housing ▪ Affordable Housing ▪ Replacement Housing	The request would not negatively impact existing market rate or affordable housing. In fact, the increase in the number of students would be accommodated on-campus, resulting in students not utilizing affordable or market rate housing in the neighborhoods.
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 would not result in new development or changes to the campus boundaries.
Access to Opportunity	Is there a change in access to opportunity? ▪ Job Training/Creation Healthcare ▪ Addition of Retail/Access to New Services	The proposal should not appear to impact employment opportunities.
Community	How did community outreach and engagement inform/change the zoning action?	The Applicant has stated that they have had collaborative discussions with the Georgetown Community Partnership (GCP), who has submitted a letter in support to the record.

VI. OP ANALYSIS

The proposed modifications have been proposed in response to external influences that have affected enrollment patterns over the past several years and will help address the economic impacts associated

with them. The requested modifications would not alter the overall enrollment headcount for the Hilltop campus, which remains at 14,106 students. The University aims to maintain the agreed-upon 970 Traditional Undergraduate Program students living in the Georgetown, Burleith, and Foxhall neighborhoods; however, should this number increase, the University proposes measures to evaluate any increase and actions to mitigate the increase by reducing the number of students per academic year.

Since the University does not propose a large increase in headcount of TUP or Medical students, and proposes methods to monitor impacts on adjacent neighborhoods, OP does not object to the modifications to Condition 10 and new Condition 12B. Further, per Condition 12, the University is required to complete a report on the student enrollment maximums outlined in Conditions 9 through 11 and submit it to the GCP. OP does not object to the proposed modification to Condition 11, the incremental increase in the Medical School Program headcount over a four-year time span.

OP therefore recommends approval of the requested Modification Without Hearing.

VII. AGENCY COMMENTS

There have been no comments from District agencies filed to the record.

VIII. ANC COMMENTS

No comments from ANCs 2E and 3D have been submitted to the record.

IX. COMMUNITY COMMENTS

Georgetown Community Partnership filed a letter in support of the requested modifications to the Campus Plan in Exhibit 3D.

X. ATTACHMENTS

ATTACHMENT A: Condition 10

ATTACHMENT B: Condition 11

ATTACHMENT C: 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~~ **6,775** students. For purposes of this condition, the Traditional Undergraduate Program student headcount shall be defined as the 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”).

ATTACHMENT B: CONDITION 11

11. During the term of Campus Plan, the Medical Student Program headcount shall not exceed ~~830-910~~ students; **provided, that the Medical Student Program headcount shall not exceed 850 students in the academic year beginning in Fall 2027, 870 students in the academic year beginning in Fall 2028, and 890 students in the academic year beginning in Fall 2029.** For purposes of this condition, the Medical Student Program headcount shall be defined as all students enrolled in the Doctor of Medicine (MD) degree program who are registered in at least one course on the Hilltop Campus.

ATTACHMENT C: 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.
- 12B. **Beginning in Spring 2028, should the number of Traditional Undergraduate Program students known to be living in the Georgetown, Burleith, and Foxhall neighborhoods (“Neighborhoods”) reported in the Spring 2028 semester Enrollment and Housing Report exceed 970 students, the Traditional Undergraduate Program student headcount maximum set forth in Condition 10 (“TUP Maximum”) shall be reduced by 25 students for the 2028-2029 academic year. If the number of Traditional Undergraduate Program students known to be living in such Neighborhoods continues to exceed 970 students in Spring 2029, the TUP Maximum shall be reduced by an additional 25 students, and shall be evaluated in the same manner in subsequent academic years, until such time as the number of Traditional Undergraduate Program students known to be living in the Neighborhoods does not exceed 970 students or the TUP Maximum is reduced back to 6,675 students. In the event the TUP Maximum has been reduced pursuant to this Condition 12B and the number of Traditional Undergraduate Program students living in the Neighborhoods reported in the Spring semester Enrollment and Housing Report no longer exceeds 970 students, the TUP Maximum may be increased by 25 students each year that compliance with the 970 student metric is achieved, up to the TUP Maximum of 6,775 students.**