APPLICANT'S PROPOSED DRAFT ORDER

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Zoning Commission

ZONING COMMISSION FOR THE DISTRICT OF COLUMBIA
ZONING COMMISSION ORDER NO. 16-18J
Z.C. Case No. 16-18J
Georgetown University
(Modification without Hearing to Conditions of Approval of 2017-2036 Campus Plan
Fall 2026 Enrollment Adjustments)
September 24, 2026

Pursuant to notice, at its September 24, 2026 public meeting, the Zoning Commission for the District of Columbia ("Commission") considered the application ("Application") of Georgetown University ("Applicant" or "University") for a modification without hearing to conditions of approval of the University's 2017-2036 Hilltop Campus Plan ("Campus Plan") approved by Z.C. Order No. 16-18, as amended by Z.C. Order Nos. 16-18A through 16-18I (collectively, "Order"), to adjust the enrollment maximums for the Traditional Undergraduate Program and the Medical Student Program. The Commission reviewed the Application pursuant to the Commission's Rules of Practice and Procedure, which are codified in Subtitle Z of the Zoning Regulations (Title 11 of the District of Columbia Municipal Regulations, Zoning Regulations of 2016, to which all subsequent citations refer unless otherwise specified). For the reasons stated below, the Commission **APPROVES** the Application.

FINDINGS OF FACT

Campus Plan Background

1. Pursuant to Z.C. Order No. 16-18 ("Campus Plan Order"), the Commission approved the University's 2017-2036 Campus Plan.

2. Conditions 9, 10, and 11 of the Campus Plan Order establish, respectively, the overall Hilltop Campus student headcount, the Traditional Undergraduate Program student headcount, and the Medical Student Program headcount. Condition 12 of the Campus Plan Order requires the University to prepare an Enrollment and Housing Report each semester documenting compliance with these headcount limits.

Parties and Notice

3. The following were automatically parties to this proceeding pursuant to Subtitle Z § 703.10: the University; Advisory Neighborhood Commission ("ANC") 2E; and ANC 3D.

4. In addition, the Citizens Association of Georgetown ("CAG"), the Burleith Citizens Association ("BCA"), the Foxhall Community Citizens Association ("FCCA"), and the Georgetown University Student Association ("GUSA") (together with ANC 2E and ANC

ZONING COMMISSION
District of Columbia
CASE NO. 16-18J
EXHIBIT NO. 9

3D, the "Campus Plan Parties") were parties to the original Campus Plan proceeding and were served with the Application and provided an opportunity to file a response, pursuant to Subtitle Z §§ 703.10 and 703.12.

5. On July 14, 2026, the University served the Application on the Campus Plan Parties, as well as on the D.C. Office of Planning ("OP") and the District Department of Transportation ("DDOT"), as attested by the Certificate of Service submitted with the Application.

The Application

6. On July 14, 2026, the University filed the Application requesting a modification without hearing to: (a) revise Condition 10 of the Campus Plan Order to increase the Traditional Undergraduate Program student headcount maximum from 6,675 to 6,775 students; (b) add a new Condition 12B establishing a mechanism to reduce the Traditional Undergraduate Program headcount maximum if the number of Traditional Undergraduate Program students living in the Georgetown, Burleith, and Foxhall neighborhoods exceeds 970 students; and (c) revise Condition 11 of the Campus Plan Order to increase the Medical Student Program headcount maximum from 830 to 910 students, phased in over a four-year period.

7. The Application states that the Traditional Undergraduate Program headcount is currently at its maximum under Condition 10, while capacity remains available under the overall Hilltop Campus headcount cap in Condition 9. The University proposes to increase the Traditional Undergraduate Program headcount by 100 students, from 6,675 to 6,775 students, representing an approximately 1.5% increase.

8. To mitigate potential impacts of the increase in the Traditional Undergraduate Program on the surrounding neighborhoods, the Application proposes a new Condition 12B, which would reduce the Traditional Undergraduate Program headcount maximum by 25 students for each academic year in which the number of Traditional Undergraduate Program students known to be living in the Georgetown, Burleith, and Foxhall neighborhoods, as reported in the prior Spring semester's Enrollment and Housing Report, exceeds 970 students, until the headcount maximum returns to 6,675 students or the 970-student threshold is no longer exceeded. Condition 12B further provides that the headcount maximum may be increased by 25 students, up to the 6,775-student maximum, for each year in which the 970-student threshold is not exceeded following a reduction.

9. The Application states that the increased Traditional Undergraduate Program enrollment will be absorbed by existing on-campus housing capacity created by the construction of Hayden and Byrnes Halls (approved in Z.C. Case No. 16-18D), and that the University intends to adopt additional policies to encourage students to remain in on-campus housing, which may include multi-year housing assignments, meal plan subsidies, fee rebates for early housing commitments, and preferential housing assignments.

10. The Application also proposes to increase the Medical Student Program headcount maximum in Condition 11 from 830 to 910 students, phased in over four years, with interim maximums of 850 students beginning in the 2027-2028 academic year, 870 students

beginning in the 2028-2029 academic year, and 890 students beginning in the 2029-2030 academic year, reaching the full 910-student maximum thereafter. The Application states that this increase is intended to address financial risks arising from recent federal actions and the national physician shortage.

11. To mitigate the impact of the increased Medical Student Program enrollment, the Application states that the University will extend existing off-campus conduct policies to these students and will provide additional on-campus parking spaces equal to the incremental increase in enrollment, to be drawn from the University's existing parking inventory, which remains below the parking cap established by the Campus Plan Order.

12. The Application states that the requested modifications do not change the overall Hilltop Campus student headcount maximum of 14,106 students established by Condition 9 of the Campus Plan Order.

Responses to the Application

13. By report dated September 14, 2026, OP recommended approval of the Application. OP found that, with the University's proposed additional on-campus student housing, housing policy, and parking enforcement measures, the University should be able to adequately accommodate the requested increase in the Traditional Undergraduate Program headcount, and OP therefore supported the proposed modification to Condition 10 and new Condition 12B. OP also found that, given the phased-in nature of the Medical Student Program increase and the University's proposed mitigation measures, OP did not object to the proposed modification to Condition 11. OP further found that the requested modifications would not alter the overall Hilltop Campus enrollment headcount, which would remain at 14,106 students, and concluded that the Application would not be inconsistent with the Comprehensive Plan, the Generalized Policy Map, or the Future Land Use Map, and would not significantly advance or impede the Comprehensive Plan's racial equity policies. OP recommended approval of the requested modification without hearing.

14. By report dated September 11, 2026, DDOT stated that the proposal to increase enrollment may have minor impacts on the District's transportation network, but that the University is working to mitigate potential transportation impacts associated with the modification that community partners may find objectionable. DDOT concluded that it has no objection to approval of the Application.

15. On August 31, 2026, ANC 2E held a regularly scheduled and duly noticed public meeting, at which a quorum of six commissioners was present, and voted 6-0-0 to support the Application. ANC 2E's report states that the Traditional Undergraduate Program increase is modest, that the University is taking concrete steps, including incentives for upperclass students to remain in on-campus housing and enhanced enforcement of the prohibition on undergraduate students bringing cars to campus (including automatic license plate reader technology), to ensure the increase does not result in more students living in the surrounding neighborhoods, and that new Condition 12B will reduce the Traditional Undergraduate Program headcount maximum if the 970-student neighborhood threshold is exceeded. ANC 2E's report further states that the phased-in Medical Student Program increase is

accompanied by a commitment to provide on-campus parking proportionate to the enrollment increase, which will limit any negative impact from the modest increase in medical student enrollment.

16. On September 2, 2026, ANC 3D voted 7-0-0 to advise the Commission that it has no objection to the Application. ANC 3D's report also describes an issue regarding the University's handling of a specific instance of off-campus student misconduct, unrelated to the Traditional Undergraduate Program or Medical Student Program enrollment adjustments that are the subject of the Application, and describes the University's commitment to enforcement of Condition 15(d) of the Campus Plan Order.

17. By letter dated July 13, 2026, the Georgetown Community Partnership ("GCP"), by its co-chairs, submitted a letter to the Commission supporting the Application. The GCP letter states that the proposed enrollment adjustments respond to external influences affecting enrollment patterns and will not alter the overall Hilltop Campus enrollment headcount, which will remain at 14,106 students, and that the University has worked closely with GCP community members to develop mitigation measures intended to ensure the enrollment adjustments do not result in objectionable impacts on the surrounding residential neighborhoods. The GCP letter concludes that the Application appropriately balances the University's enrollment management needs with the quality of life of neighboring residents.

CONCLUSIONS OF LAW

1. Subtitle Z § 703.1 authorizes the Commission, in the interest of efficiency, to make modifications without a public hearing to approved contested case final orders and plans approved by such orders.

2. Subtitle Z § 703.6 defines a "modification without hearing" as "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," and provides that the determination whether a modification can be approved without witness testimony is within the Commission's discretion.

3. The Commission concludes that the Application qualifies as a modification without hearing within the meaning of Subtitle Z § 703.6 because the impact of the requested adjustments to the Traditional Undergraduate Program and Medical Student Program headcount maximums may be understood without witness testimony: the modifications are limited to changes to conditions that modestly adjust the Traditional Undergraduate Program and Medical Student program enrollment maximums without increasing the overall Hilltop Campus headcount maximum, and the University has paired the adjustments with corresponding protections including: (a) a mechanism that would roll back the undergraduate enrollment increase based on the number of off-campus undergraduate students reported to live in the neighborhoods surrounding the Hilltop Campus, set forth in new Condition 12B, to mitigate any resulting impact from the Traditional Undergraduate Program increase on the surrounding neighborhoods; and (b) a phased increase in the

Medical Student Program increase accompanied by commitments regarding parking and student conduct.

4. The Commission concludes that the Applicant satisfied the requirement of Subtitle Z § 703.10 to serve the Application on all parties to the original Campus Plan proceeding, namely ANC 2E, ANC 3D, CAG, BCA, FCCA, and GUSA, as well as on OP and DDOT.

5. The Commission further concludes that ANC 2E and ANC 3D each filed a timely written response to the Application within thirty (30) days after the Application was filed and served, as required by Subtitle Z § 703.12, and that no party requested that the Application be removed from the Consent Calendar pursuant to Subtitle Z § 703.15(a).

6. The Commission finds that the Application is consistent with the Campus Plan because the requested modifications do not increase the overall Hilltop Campus headcount and are supported by demonstrated on-campus housing capacity and mitigation commitments so that the modifications are not likely to create objectionable conditions in the surrounding residential neighborhoods. The Commission notes that OP, DDOT, both affected ANCs, and the GCP support approval of the Application.

"GREAT WEIGHT" TO THE RECOMMENDATIONS OF OP

7. The Commission is required to give "great weight" to the recommendation of OP pursuant to § 5 of the Office of Zoning Independence Act of 1990, effective September 20, 1990 (D.C. Law 8-163; D.C. Official Code § 6-623.04 (2018 Repl.)) and Subtitle Z § 405.9. (Metropole Condo. Ass'n v. D.C. Bd. of Zoning Adjustment, 141 A.3d 1079, 1087 (D.C. 2016).)

8. The Commission finds persuasive OP's recommendation that the Commission approve the Application and therefore concurs in that judgment.

"GREAT WEIGHT" TO THE WRITTEN REPORT OF THE ANCs

9. The Commission must give "great weight" to the issues and concerns raised in a written report of an affected ANC that was approved by the full ANC at a properly noticed meeting that was open to the public pursuant to § 13(d) of the Advisory Neighborhood Commissions Act of 1975, effective March 26, 1976 (D.C. Law 1-21; D.C. Official Code § 1-309.10(d) (2012 Repl.)) and Subtitle Z § 406.2. To satisfy the great weight requirement, the Commission must articulate with particularity and precision the reasons why an affected ANC does or does not offer persuasive advice under the circumstances. (Metropole, 141 A.3d at 1087.) The District of Columbia Court of Appeals has interpreted the phrase "issues and concerns" to "encompass only legally relevant issues and concerns." (Wheeler v. D.C. Bd. of Zoning Adjustment, 395 A.2d 85, 91 n.10 (1978) (citation omitted).) Because the Hilltop Campus is located within the boundaries of both ANC 2E and ANC 3D, each is an affected ANC for purposes of the Application.

10. ANC 2E's report indicates that, at a regularly scheduled and duly noticed August 31, 2026 public meeting, with a quorum of six commissioners present, ANC 2E voted 6-0-0 to

support the Application, finding that the proposed enrollment adjustments are modest and that the University's proposed mitigation measures, including the Condition 12B enrollment/housing mechanism, on-campus housing incentives, enhanced parking enforcement, and proportionate additional parking for medical students, adequately address potential neighborhood impacts. The Commission finds ANC 2E's recommendation persuasive and concurs in that judgment.

11. ANC 3D's report indicates that, at a regularly scheduled and duly noticed September 2, 2026 public meeting, ANC 3D voted 7-0-0 to advise that it has no objection to the Application. ANC 3D's report separately describes an issue unrelated to the enrollment adjustments themselves regarding a specific instance in which the University did not promptly address a report of off-campus student misconduct under Condition 15(d) of the Campus Plan Order. The Commission has considered this issue and finds it does not bear on whether the requested enrollment adjustments satisfy the standards for a modification without hearing, because the concern relates to enforcement of the University's existing student conduct obligations under Condition 15(d) rather than to the Traditional Undergraduate Program or Medical Student Program headcount maximums that are the subject of the Application. Moreover, ANC 3D's report states that the University has affirmed its enforcement of Condition 15(d), and Condition 15(d) otherwise remains fully in effect and enforceable independent of this Order. On this basis, the Commission finds ANC 3D's recommendation of no objection to the Application persuasive and concurs in that judgment.

DECISION

In consideration of the case record and the Findings of Fact and Conclusions of Law herein, the Commission concludes that the Applicant has satisfied its burden of proof and therefore APPROVES the Application's request for a modification without hearing and amends the conditions of the Campus Plan Order as follows (additions in **bold underline**; deletions in ~~**bold strikethrough**~~):

Traditional Undergraduate Program Headcount

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").

12B. Beginning in Spring 2028, and in each successive year thereafter, should the number of Traditional Undergraduate Program (" TUP") students known to be living in the Georgetown, Burleith and Foxhall neighborhoods ("Neighborhoods") reported in the Spring semester Enrollment and Housing Report exceed 970 students, the Traditional

Undergraduate Program student headcount maximum set forth in Condition 10 ("TUP Maximum") to be in effect for the subsequent academic year shall be reduced by 25 students from the TUP Maximum in effect for the then-current academic year, 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.[1]

Medical Student Program Headcount

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.

FINAL ACTION
VOTE (September 24, 2026): **5-0-0** (Anthony J. Hood, Robert E. Miller, Gwen Wright, Joseph S. Imamura, and Christine Bruins to approve).

In accordance with the provisions of Subtitle Z § 604.9, this Order No. 16-18J shall become final and effective upon publication in the District of Columbia Register; that is, on [DATE].

BY THE ORDER OF THE D.C. ZONING COMMISSION

ANTHONY J. HOOD	**SARA A. BARDIN**
CHAIRMAN	**DIRECTOR**
ZONING COMMISSION	**OFFICE OF ZONING**

IN ACCORDANCE WITH THE D.C. HUMAN RIGHTS ACT OF 1977, AS AMENDED, D.C. OFFICIAL CODE § 2-1401.01 ET SEQ. (ACT), THE DISTRICT OF COLUMBIA DOES NOT DISCRIMINATE ON THE BASIS OF ACTUAL OR PERCEIVED: RACE, COLOR, RELIGION, NATIONAL ORIGIN, SEX, AGE, MARITAL STATUS, PERSONAL APPEARANCE, SEXUAL ORIENTATION, GENDER IDENTITY OR EXPRESSION, FAMILIAL STATUS, FAMILY RESPONSIBILITIES, MATRICULATION, POLITICAL

[1] The version of Condition 12B submitted with this draft order reflects non-substantive edits to the Applicant's original proposed language to clarify the operation of the proposed condition.

AFFILIATION, GENETIC INFORMATION, DISABILITY, SOURCE OF INCOME, OR PLACE OF RESIDENCE OR BUSINESS. SEXUAL HARASSMENT IS A FORM OF SEX DISCRIMINATION WHICH IS PROHIBITED BY THE ACT. IN ADDITION, HARASSMENT BASED ON ANY OF THE ABOVE PROTECTED CATEGORIES IS PROHIBITED BY THE ACT. DISCRIMINATION IN VIOLATION OF THE ACT WILL NOT BE TOLERATED. VIOLATORS WILL BE SUBJECT TO DISCIPLINARY ACTION.