

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
Zoning Commission**

**ZONING COMMISSION FOR THE DISTRICT OF COLUMBIA
ZONING COMMISSION ORDER NO. 20-08D**

Z.C. Case No. 20-08D

**GS Development Services Northeast, LLC
Further Processing of Howard University's 2020 Central Campus Master Plan
and Related Special Exception Relief
February 9, 2026**

Pursuant to notice, at its February 9, 2026, public hearing, the Zoning Commission for the District of Columbia ("Commission") considered the application ("Application") of Greystar Development Services, Northeast, LLC ("Applicant"), as authorized by the Howard University ("Howard") for the following approvals under 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):

- Further processing of Howard's 2020 Central Campus Master Plan (the "Campus Plan") approved by Z.C. Order No. 20-08, as amended by Z.C. Order Nos. 20-08A, 20-08B, 20-08C, and 20-08E (collectively, the "Order") pursuant to Subtitle X §§ 101 and 106.1 and Subtitle Z § 302, to authorize the construction of a mixed-use development consisting of various education-based uses, with a development program including 282 student housing units (595 beds), ground-floor retail, a student dining hall, and a full-service wellness center (the "Project"); and
- Related zoning relief to accommodate the design of the Project, including (i) special exception approval from the plaza requirement in the MU-10 zone set forth in Subtitle G § 212.1 and (ii) special exception approval from the short-term bicycle parking requirement for education uses (college/university) set forth in Subtitle C § 802.1.

The property that is the subject of the Application is a portion of Howard's campus¹ located on Lot 44 in Square 3064, with a street address of 2301 Georgia Avenue, N.W. and known in the Campus Plan as the Wonder Plaza site (the "Property"). The Commission reviewed the Application pursuant to the Commission's Rules of Practice and Procedures, which are codified in Subtitle Z. For the reasons stated below, the Commission **APPROVES** the Application.

***** SUMMARY ORDER *****

BACKGROUND

1. Pursuant to Z.C. Order No. 20-08, the Commission granted a special exception approved the Campus Plan for the Main Campus. The Property was included within the boundaries of the Campus Plan and designated as a site for redevelopment "to create a new epicenter for student engagement and activity, by fusing recreation, residential, and retail uses." The

¹ Howard's central campus consists of property located in Squares 330, 2872, 2873, 2882, 2885, 3055, 3057, 3058, 360, 3063, 3064, 3065, 3068, 3069, 3072, 3074, 3075, 3080, and 3094.

Campus Plan further noted that the proposed concept, referred to therein as the Fusion Building, would provide “additional flexibility in student life facilities and support spaces while adding density and animation to Georgia Avenue.” (Exhibit [“Ex.”] 3E.)

2. When the Commission approved the Campus Plan, the Property was zoned PDR-2. Pursuant to Z.C. Order No. 24-01, the Property was rezoned to the MU-10 zone, thereby enabling the redevelopment of the Property as envisioned and set forth in the Campus Plan.²

PARTIES

3. Howard authorized GS Development Services Northeast, LLC to serve as its representative for purposes of the Application. (Ex. 3H.)
4. In addition to the Applicant, the only other party to the case is ANC 1E, which is the “affected ANC” pursuant to Subtitle Z §§ 101.8 and 403.5(b).³
5. No other requests for party status were received.

NOTICE

6. The Applicant mailed a Notice of Intent (“NOI”) to file the Application on March 11, 2024, in accordance with Subtitle Z §§ 302.6 and 302.7. The NOI was mailed to the affected ANC, as well as to the owners of all property located within 200 feet of the perimeter of the Property involved in the Application. The NOI also generally described the Project and its significant aspects. (Ex. 3K.)
7. On November 27, 2024, the Applicant served the Application on the Office of Planning (“OP”) and the affected ANC in accordance with Subtitle Z § 302.11. The Applicant also served the Application on the District Department of Transportation (“DDOT”), attested to by the certificate of service filed with the Application. (Ex. 2.)
8. A public hearing was originally scheduled for May 5, 2025; however, prior to the Office of Zoning (“OZ”) issuing notice pursuant to Subtitle Z § 402, the Applicant filed a letter on March 18, 2025, requesting deferral of the public hearing. The request was approved, and the public hearing was postponed to July 7, 2025. Thereafter, OZ published timely notice of the first rescheduled public hearing in the *D.C. Register* issue dated April 11, 2025 (72 DCR 004448 *et seq.*), as well as on the calendar on OZ’s website. (Ex. 4, 6–7.)
9. On May 27, 2025, the Applicant filed a second request to defer the public hearing indefinitely, which was approved. A public hearing was subsequently rescheduled for

² Z.C. Order No. 24-01, effective June 6, 2025, also had the effect of rezoning other properties within Howard’s central campus to the MU-10 zone and the MU-9B zone.

³ At the time the Campus Plan was approved, ANC 1B was the affected ANC. As a result of the District’s decadal ANC redistricting that took effect on July 1, 2023, the Property and the majority of Howard’s Central Campus are within the boundaries of ANC 1E.

February 9, 2026, and OZ published timely notice of the second rescheduled public hearing in the *D.C. Register* issue dated November 28, 2025 (72 DCR 013173 *et seq.*), as well as on the calendar on OZ's website. (Ex. 12-14.)

10. Pursuant to Subtitle Z §§ 402.8 and 402.9, the Applicant submitted an affidavit of posting on January 14, 2026, along with correspondence requesting that the Commission exercise its authority under Subtitle Z § 101.9 to waive the 40-day posting requirement set forth in Subtitle Z § 402.3 due to the late posting of the additional notice at the Property. The Commission approved the Applicant's waiver request as a preliminary matter at the February 9, 2026, public hearing. (Ex. 17-17A; February 9, 2026, hearing transcript ["Tr."] at pp. 6-7.)
11. The Applicant submitted an affidavit of maintenance dated February 4, 2026, confirming compliance with maintenance requirements of Subtitle Z § 402.10.

THE PROPERTY

12. The Property consists of approximately 69,313 square feet of land area and is located on the east side of Georgia Avenue N.W., north of Bryant Street. It sits along the western boundary of Howard's Central Campus and is surrounded by Downing Hall (Howard University College of Engineering and Architecture) to the north, and various university buildings to the east, including the Bunche Center and the Howard's Power Plant. (Ex. 3.)
13. The surrounding area contains a mix of institutional and commercial uses. The Property is located in a walkable area and is well served by public transit, including nearby Metrorail stations, Metrobus service, and University shuttle service. (*Id.*)
14. The Property is currently improved with the Wonder Plaza (iLab) building, which previously provided digital services and support to Howard's students and community, and included some fast-casual restaurant tenants. (*Id.*)

THE APPLICATION

15. On November 27, 2024, the Applicant submitted the Application requesting:
 - Further processing approval to authorize the construction of the Project;
 - Special exception approval to permit the absence of a plaza that, in the MU-10 zone, must comprise at least eight percent (8%) of the lot area when the lot exceeds 10,000 square feet of land area; and
 - Special exception approval from the short-term bicycle parking requirement, where 100 spaces would otherwise be required pursuant to Subtitle C § 802.1, which proscribes (1) space per 2,000 square feet of educational (college/university) use, but only 32 spaces would be provided for the Project.(Ex. 1-3M.)
16. The Application included a narrative of the Project's compliance with the applicable criteria of Subtitle X § 101 and the filing requirements of Subtitle X § 106.1 and Subtitle Z § 302, including a Comprehensive Plan consistency analysis concluding that the Project

would not be inconsistent with the Citywide Elements of the Comprehensive Plan and would further racial equity goals.⁴ (Ex. 3.)

17. The Application included narratives justifying the related requests for special exception approval, summarized as follows:
 - Plaza – Relief from the MU-10 plaza requirement is warranted because the Project’s multiple active ground floor entrances and preservation-driven design better achieve the Campus Plan’s urban, pedestrian-oriented objectives without the need for a centralized plaza.
 - Short-Term Bicycle Parking – Relief from the short-term bicycle parking requirement is appropriate due to site and streetscape constraints. The Project also maximizes feasible short-term spaces and provides significant long-term bicycle (43 spaces required; 110 spaces proposed) parking to better serve its predominantly student-resident population.(*Id.*)
18. On January 12, 2026, the Applicant submitted a prehearing statement, which generally restated the proposed development program and explained how the Project would advance Howard’s objectives and support the Applicant’s request for design flexibility, along with supporting documentation, including a complete set of updated plans (the “Prehearing Submission”). (Ex. 16-16C.)
19. The Prehearing Submission included a Transportation Statement prepared by Gorove Slade, dated December 18, 2025, which concluded, among other things, that: (i) the Property is surrounded by a well-connected network of transit, bicycle, and pedestrian facilities that supports effective non-vehicular transportation; (ii) the Project includes a robust Transportation Demand Management (“TDM”) plan incorporating building-specific and campus-wide measures to promote non-vehicular travel; and (iii) the Project is not expected to have a detrimental impact on the surrounding transportation network. (Ex. 16B.)
20. On January 27, 2026, at the request of OP, the Applicant submitted a LEED scorecard for inclusion in the public record demonstrating that the Project would be capable of achieving LEED Gold certification under the current LEED v4 BD+C: Multifamily Midrise rating system. (Ex. 18-18A.)

RESPONSES TO THE APPLICATION

OP

21. By report dated January 30, 2026, OP concluded that the Application met the requirements of Subtitle X §§ 101 and 106.1 and Subtitle Z § 302 for further processing of the Campus Plan and recommended approval. OP found that the Project and its mixed use development

⁴ The Applicant’s racial equity analysis complies with the requirements of the Commission’s revised Racial Equity Tool, including a discussion of the Applicant’s community outreach and engagement regarding the Application. (Ex. 3F.)

program are consistent with the vision for the Property set forth in the Campus Plan, the intent of the MU 10 zone, and the relevant policies of the Comprehensive Plan; would not be likely to become objectionable to neighboring properties; appropriately support Howard's educational mission through expanded on-campus student housing and active ground floor uses; and advance transportation, sustainability, and urban design objectives along the Georgia Avenue corridor. OP further determined that the requested special exception relief from the MU 10 plaza and short-term bicycle parking requirements, as well as the requested design flexibility, satisfied the applicable criteria and would not adversely affect surrounding properties. (Ex. 19.)

22. At the February 9, 2026, public hearing, OP summarized the conclusions of its report and reiterated its recommendation that the Commission approve the Application. (Tr. at pp. 49-50.)

DDOT

23. By report dated January 30, 2026, DDOT expressed no objection to approval of the Application, subject to the following three conditions: (i) implementation of the TDM plan for the student housing component, (ii) dedication or easement of property for alley widening, and (iii) restrictions on construction within the widened alley, and noted that continued coordination with the Applicant is expected given the complexity and size of the Campus Plan. (Ex. 20.)
24. At the February 9, 2026, public hearing, DDOT amended its recommendation to include only the following two conditions: (i) implementation of the TDM Plan for the student housing component of the Project, and (ii) memorialization of DDOT's agreement with the Applicant to complete a public access easement for the alley widening area prior to issuance of a certificate of occupancy for the Project. (Tr. at pp. 47-49.)

ANC 1E

25. By report filed on December 16, 2025, ANC 1E stated that at its February 25, 2025, regularly-scheduled and duly-noticed public meeting, with a quorum present, it voted unanimously to support the Application. (Ex. 15.)

CONCLUSIONS

1. The Commission is authorized under the Zoning Act, approved June 20, 1938 (52 Stat. 797, as amended; D.C. Official Code § 6-641.01 (2018 Repl.)) to grant campus plan approvals consistent with the requirements set forth in Subtitle X § 101 and Subtitle Z § 302. Pursuant to Subtitle X § 101, the Commission shall evaluate an application for an amendment of a campus plan and further processing as a special exception:

Education use by a college or university shall be permitted as a special exception subject to review and approval by the Zoning Commission under Subtitle X, Chapter 9 after its determination that the use meets the applicable standards and conditions of this chapter. (Subtitle X § 101.1.)

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. (Subtitle X § 101.10.)

2. Section 8 of the Zoning Act (see also Subtitle X § 901.2) establishes that the Commission may grant a special exception upon its determination that the special exception:
 - *Will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Map;*
 - *Will not tend to affect adversely the use of neighboring property in accordance with the Zoning Regulations and Zoning Map; and*
 - *Complies with the special conditions specified in the Zoning Regulations.*

Relief granted through a special exception is presumed appropriate, reasonable, and compatible with other uses in the same zoning classification, provided the specific regulatory requirements for the relief requested are met. In reviewing an application for special exception relief, the Commission's discretion is limited to determining whether the proposed exception satisfies the requirements of the regulations and "if the applicant meets its burden, the [Commission] ordinarily must grant the application." (*First Washington Baptist Church v. D.C. Bd. of Zoning Adjustment*, 423 A.2d 695, 701 (D.C. 1981) (quoting *Stewart v. D.C. Bd. of Zoning Adjustment*, 305 A.2d 516, 518 (D.C. 1973)).)

3. Based on the record before the Commission, the Commission concludes that the Applicant has met the burden of proof and that the requested approvals and relief can be granted. The Application satisfies the special exception standards for the requested further processing of the Campus Plan, as well as for the plaza and short-term bicycle parking relief.
4. The Commission must 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 § 405.8 (*Metropole Condo Ass'n v. D.C. Bd. of Zoning Adjustment*, 141 A.3d 1079, 1087 (D.C. 2016)).
5. The Commission finds persuasive OP's analysis that the Application satisfies the requirements of the Zoning Regulations for further processing of the Campus Plan and the requested special exception relief, and the Commission concurs with OP's judgement.
6. The Commission must give "great weight" to the issues and concerns raised in a written report of the 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.); see 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 (D.C. 1978) (citation omitted)).

7. The Commission finds persuasive the support of ANC 1E, as set forth in its written report approved at a duly-noticed public meeting with a quorum present, and the Commission concurs with that ANC’s support.
8. Because no persons or parties appeared in opposition to the Application, a decision by the Commission to grant this Application would not be adverse to any party. Indeed, ANC 1E, the affected ANC, supported the Application. Therefore, pursuant to Subtitle Z § 604.7, the Commission authorized a Summary Order in this case and determined it may waive the requirement that findings of fact and conclusions of law accompany the Order because such waiver will not prejudice the rights of any party.

DECISION

In consideration of the record and the findings and conclusions above, the Commission concludes that the Applicant has satisfied its burden of proof and therefore **APPROVES** the Application subject to the following conditions for (whenever compliance is required prior to, on, or during a certain time, the timing of the obligation is noted in **bold and underlined text**):

- A. **Project Development**. The Project shall be developed and constructed in substantial accordance with the architectural plans and elevations prepared by WDG Architecture and Moody Nolan, dated January 12, 2026, and marked as Ex. 16A1-16A2 of the record, as well as the LEED scorecard marked at Ex. 18A of the record (collectively, the “Approved Plans”), as modified by the guidelines, conditions, and standards herein, and with special exception relief from the applicable plaza and short-term bicycle parking requirements.
- B. **Design Flexibility**. The Project shall have design flexibility as follows:
 1. *Interior Components*: To vary the location and design of all interior components, including partitions, structural slabs, doors, hallways, columns, stairways, atria, and mechanical rooms, provided that the variations do not change the exterior configuration of the building as shown on the Approved Plans.
 2. *Exterior Materials – Color*: To vary the final selection of the colors of the exterior materials based on availability at the time of construction, provided such colors are within the color ranges shown on the Approved Plans.
 3. *Exterior Details – Location and Dimension*: To make minor refinements to the locations and dimensions of exterior details that do not substantially alter the exterior configuration of the building or design shown on the Approved Plans. Examples of

exterior details would include, but are not limited to, doorways, canopies, railings, and skylights.

4. *Number of Student Housing Units:* To provide a range in the approved number of student housing units of plus or minus ten percent (10%), except that the total square footage for the student housing use shall not be reduced.
 5. *Parking Layout:* To make refinements to the approved parking configuration, including layout and number of parking space plus or minus ten percent (10%), so long as the number of parking spaces is at least the minimum number of spaces required by the Zoning Regulations.
 6. *Streetscape Design:* To vary the location, attributes, and general design of the approved streetscape to comply with the requirements of, and the approval by, the DDOT Public Space Division;
 7. *Signage:* To vary the font, message, logo, and color of the approved signage, provided that the maximum overall dimensions and signage materials are consistent with the signage on the plans approved by the order and are compliant with the DC signage regulations; and
 8. *Sustainable Features:* To vary the approved sustainable features of the Project, provided that the total number of LEED points achievable for the Project does not decrease below the minimum shown in the LEED Scorecard marked as Ex. 18A in the record.
- C. **Public Access Easement. Prior to issuance of the final certificate of occupancy for the Project,** the Applicant shall record a 5-foot wide public access easement adjacent to the public alley to the rear of the Project, extending from Bryant Street, effectively widening the public alley from 15 to 20 feet.
- D. **Transportation Demand Management. During the life of the Project (unless otherwise noted),** the Applicant shall implement the following TDM measures for the student housing component of the Project:

Coordination, Marketing, and Management:

1. Provide welcome packets to all new student residents upon or prior to moving in. The packet should, at a minimum, include the Metrorail pocket guide, brochures of local Metrobus lines, carpool and vanpool information, CaBi coupon or rack card, Guaranteed Ride Home (GRH) brochure, and the most recent DC Bike Map. Brochures can be ordered from DDOT's goDCgo program by emailing info@godcgo.com.

2. Post all transportation and TDM commitments on Howard University’s website and in other Howard University media, publicize availability, and allow the public to see what has been promised.
3. Following the issuance of a Certificate of Occupancy for the Project, the Transportation Coordinator will submit documentation summarizing compliance with the transportation and TDM conditions of the Order (including, if made available, any written confirmation from the Office of the Zoning Administrator) to the Office of Zoning for inclusion in the IZIS case record of the case

Bicycle, Transit, and Micro-Mobility Facilities:

4. Provide at least six (6) showers and 25 lockers, which will be located within the building’s Health and Wellness space.
5. Provide 110 long-term bicycle parking spaces, significantly exceeding ZR16 requirements.
6. To the extent possible, maintain existing bus routes and stops during construction events in order to avoid transit service disruptions for Howard University and surrounding communities.

VOTE (February 9, 2026): 5-0-0 (Joseph S. Imamura, Tammy Stidham, Anthony J. Hood, Robert E. Miller, and Gwen Wright to approve).

In accordance with the provisions of Subtitle Z § 604.9, this Order No. 20-08D shall become final and effective upon publication in the *D.C. Register*; that is, on [REDACTED], 2026.

BY THE ORDER OF THE D.C. ZONING COMMISSION

A majority of the Commission members approved the issuance of this Order.

ANTHONY HOOD
CHAIRMAN
ZONING COMMISSION

SARA A. BARDIN
DIRECTOR
OFFICE OF ZONING

THE APPLICANT IS REQUIRED TO COMPLY FULLY WITH THE PROVISIONS THE D.C. HUMAN RIGHTS ACT OF 1977, D.C. LAW 2-38, AS AMENDED, D.C. OFFICIAL CODE § 2- 1401.01 ET SEQ., (THE “ACT”). THIS ORDER IS CONDITIONED UPON FULL COMPLIANCE WITH THOSE PROVISIONS. IN ACCORDANCE WITH THE 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 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. THE FAILURE OR REFUSAL OF THE APPLICANT TO COMPLY SHALL FURNISH GROUNDS FOR DENIAL OR, IF ISSUED, REVOCATION OF ANY BUILDING PERMITS OR CERTIFICATES OF OCCUPANCY ISSUED PURSUANT TO THIS ORDER.

DRAFT