

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Zoning Commission



ZONING COMMISSION FOR THE DISTRICT OF COLUMBIA
ZONING COMMISSION ORDER NO. 80-07F

Z.C. Case No. 80-07F

Georgetown University

(Modification without Hearing for a Planned Unit Development @ Square 563, Lot 16

111 Massachusetts Avenue NW)

October 9, 2025

Pursuant to notice, at its October 9, 2025 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 the design of the approved Planned Unit Development (“PUD”) for Lot 16 in Square 563, with a street address of 111 Massachusetts Avenue, NW (the “Property”). The Commission reviewed the Application pursuant to the Commission’s Rules of Practice and Procedures, which are codified in Subtitle Z of the Zoning Regulations (Title 11 of the District of Columbia Municipal Regulations, to which all subsequent citations refer unless otherwise specified). For the reasons stated below, the Commission **APPROVES** the Application.

FINDINGS OF FACT

PRIOR APPROVALS

1. Pursuant to Z.C Order No. 324, the Commission approved a PUD to construct a mixed-use building containing office, residential, and/or retail uses at the Property (“Building”). At the time of approval of the PUD, the Property was located in the C-3-C Zone District.
2. Pursuant to Z.C. Order No. 80-07D, the Commission approved the addition of university use as a permitted use of the PUD.
3. Pursuant to Z.C. Order No. 80-07E, the Commission approved design modifications to the Building to facilitate the adaptive reuse of the Building by the University.¹

¹ Pursuant to Z.C. Order No. 80-07A, the Commission approved a three-story expansion and reskinning of the Building as well as a related Zoning Map Amendment from the C-3-C zone to the C-4 zone that was sought by a prior owner (“Proposed Expansion”). The Commission then approved a Modification of Consequence to the Proposed Expansion in Z.C. Order No. 80-07B as well as a two-year time extension in Z.C. Order No. 80-07C and an additional administrative COVID-19 One-Year Time Extension pursuant to Z.C. Order No. 80-07A(1). Construction of the Proposed Expansion was not pursued and, accordingly, both Z.C. Order No. 80-07A and 80-07B have expired pursuant to Subtitle Z § 702.6.

PARTIES AND NOTICE

4. The following were automatically parties to this proceeding pursuant to Subtitle Z § 403.5:
 - The University; and
 - Advisory Neighborhood Commission 6E (“ANC 6E”).
5. The University served the Application on September 2, 2025 on ANC 6E as well as the D.C. Office of Planning (“OP”) and District Department of Transportation (“DDOT”) as attested by the Certificate of Service submitted with the Application. (Ex. 2.)

THE APPLICATION

6. On September 2, 2025, the University filed the Application requesting a Modification without Hearing to seek approval for upper-story building identification signage to complement the University’s adaptive reuse of the building (“Project”). The University reopened the Building in August 2025 as a multi-use education facility with a mix of classrooms, offices, student-serving spaces, and other academic and administrative uses. The Applicant explained that the signage would provide an essential wayfinding element and identify the University’s presence in the neighborhood. (Ex. 2.)
7. The plans submitted with the Application (“Plans”) showed new upper-story signage at the east and west elevations of the Building to be raceway mounted and featuring white, internal illumination. The Plans also included the proposed height and location of the signage, showing its proportionality to the scale and mass of the Building. (Ex. 2; 2D1-2D2.)
8. The University requested flexibility to modify the design and content of the signage over the life of the Building so long as any changes remain consistent with the size, location, and type of signage shown on the Plans. (Ex. 2.)

RESPONSES TO THE APPLICATION

9. OP submitted a report on September 29, 2025 (“OP Report”) recommending approval of the Application. OP concluded that the signage would not impact the use, height, density, or overall visual appearance of the façade design from the previously approved plans. OP also stated that the signage would provide wayfinding benefits in identifying the University’s Capitol Campus. OP did not object to the design flexibility to modify the design and content of the signage over the life of the Building within the size, location, and type of signage shown on the Plans. (Ex. 3.)
10. By report dated October 6, 2025 and pursuant to vote taken at a regularly-scheduled and duly-noted public meeting on September 25, 2025, with a quorum present, ANC 6E voted unanimously to support the Application, such support being conditioned on the upper-story signage light being turned off by 10:00 p.m. Eastern Time with the possibility to extend the agreed-upon time to 11:00 p.m. (Ex. 5.)

11. By letter dated October 8, 2025, the University stated that it had agreed with ANC 6E that the lighting of the upper-story sign would be turned off by 10:00 PM, with the ability to extend the turn-off time to 11:00 PM if agreed to by ANC 6E. (Ex. 6.)

CONCLUSIONS OF LAW

1. Subtitle Z § 703.1 authorizes the Commission, in the interest of efficiency, to make modifications to final orders and plans without a public hearing.
2. Subtitle Z § 703.6 defines a “Modification without Hearing” as “a modification in which impact may be understood without witness testimony.”
3. Subtitle Z § 703.6 includes “a redesign or relocation of architectural elements and open spaces from the final design approved by the Commission” as an example of a Modification without Hearing.
4. The Commission concludes that the University satisfied the requirement of Subtitle Z § 703.10 to serve the Application on all parties to the original proceeding, in this case ANC 6E.
5. The Commission concludes that the Application qualifies as a Modification without Hearing within the meaning of Subtitle Z § 703.6, as a request to modify the approved plans and therefore the modification can be granted without a public hearing pursuant to Subtitle Z § 703.1.
6. The Commission finds that the Application is consistent with the PUD as previously approved because the modification will identify the University’s presence downtown and further the goals of activating the surrounding neighborhood.

“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 OP’s recommendation to approve the Application persuasive and 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 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.) 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 Condo. Ass’n v. D.C. Bd. of Zoning Adjustment, 141 A.3d 1079, 1087 (D.C. 2016).) The District of Columbia Court of Appeals has interpreted the phrase “issues and concerns” to “encompass only legally relevant issues and concerns.” (Wheeler v. District of Columbia Board of Zoning Adjustment, 395 A.2d 85, 91 n.10 (1978) (citation omitted).”)

10. The Commission finds ANC 6E’s recommendation to approve the Application persuasive and concurs in that judgment. The Commission notes that the University and ANC 6E have reached an understanding on the cut-off time for the lighting of the upper-story signage.

DECISION

In consideration of the case record and the Findings of Fact and Conclusions of Law herein, the Commission concludes that the University has satisfied its burden of proof and therefore **APPROVES** the Application’s request for a Modification without Hearing. The conditions of Z.C. Order No. 80-07E remain unchanged and in effect, except as follows (deletions shown in **bold** and ~~striketrough~~ text; additions in **bold** and underlined text):

1. Condition 1 is hereby revised to read as follows

The Project shall be built in accordance with the plans and elevations dated October 2, 2023 (Ex. 3E1-3E2) as updated by the plan submitted October 15, 2023 (Ex. 5A) **and as further updated by the plans dated August 20, 2025 and submitted in the record of Z.C. Case No. 80-07F (Ex. 2D1 and 2D2 of Case No. 80-07F)** (the “Final Plans”) subject to the following area of design flexibility:

h. To modify the design and content of the signage, within the size, location, and type of signage shown on the Final Plans and provided that such signage complies with District of Columbia signage regulations.

All other conditions of Z.C. Order No. 324, as modified by Z.C. Order No. 80-07D and Z.C. Order No. 80-07E, remain unchanged and in effect.

FINAL ACTION

VOTE (October 9, 2025) **3-0-2**:

(Anthony J. Hood, Robert E. Miller, and Gwen Wright to **APPROVE**; Joseph S. Imamura and Tammy Stidham, having not participated, not voting).

In accordance with the provisions of Subtitle Z, Section 604.9, this Order No. 80-07F shall become final and effective upon publication in the *District of Columbia Register*; that is, on _____.

BY THE ORDER OF THE D.C. ZONING COMMISSION

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

ANTHONY J. HOOD
CHAIRMAN
ZONING COMMISSION

SARA A. BARDIN
DIRECTOR
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 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.