

September 2, 2025

Via IZIS

Anthony Hood, Chairperson
District of Columbia Zoning Commission
441 4th Street, NW, Suite 200-S
Washington, DC 20001

Re: Zoning Commission Case No. 80-07F: Modification without Hearing to Z.C. Order Nos. 324, 80-07D, and 80-07E for 111 Massachusetts Avenue, NW (Square 563, Lot 16)

Dear Chairperson Hood and Members of the Commission:

Georgetown University (“**University**” or “**Applicant**”) hereby requests a modification without hearing to Z.C. Order Nos. 324, 80-07D, and 80-07E (together, “**Orders**”). The University has completed its full-scale renovation of the existing building at 111 Massachusetts Avenue NW (“**Building**”) and seeks approval for upper-story building identification signage to complement its adaptive reuse (the “**Project**” or “**Modification**”).

I. Background Regarding the Property

The property that is the subject of this application is Lot 16 in Square 563, which is bounded by Massachusetts Avenue NW, New Jersey Avenue NW, 2nd Street NW, and H Street NW (“**Property**”). The Property consists of approximately 35,336 square feet of land area. The Property is located in the High Density Commercial category on the Future Land Use Map of the District of Columbia Comprehensive Plan.

The Zoning Commission first approved a planned unit development (“**PUD**”) for the Property in 1980 pursuant to Z.C. Order No. 324 (Z.C. Case No. 80-07), and the Building was constructed on the Property pursuant to this approval. Pursuant to modifications approved in ZC. Case No. 80-07D (“**Use Modification**”) and 80-07E (“**Design Modification**”), the Commission

approved changes to the Building to allow for its renovation and use by the University. The original PUD order and the Modification orders are attached as Exhibits C, D, and E.¹

Pursuant to the Orders, the University has modernized and adapted the Building for university use, and the Building reopened in August 2025 as a multi-use education facility for programs in the School of Continuing Studies, Earth Commons Institute, School of Nursing, School of Health, McDonough School of Business, and executive education programs, with a mix of classrooms, offices, student-serving spaces, and other academic and administrative uses. A campus store on the ground floor is scheduled to open to the public in October 2025.

As a part of the Design Modification approval, the Commission previously approved flexibility to install ground-floor building identification at the new building entrance portals as well as signage for the retail spaces within the Building.² Since that approval, the University has engaged Perkins & Will to develop a comprehensive signage plan for the University's Capitol Campus. Consistent with that comprehensive signage plan, the University now seeks approval for upper-story building identification signage on the east and west facades of the Building ("**Signage**").

The size, location, and illumination of the proposed Signage is shown on the plans attached as Exhibit F ("**Signage Plans**"). These details are consistent with signage approved by the Commission for another proposed Capitol Campus building, the University's new law building in Z.C. Order No. 23-10A, as well as upper-story building and tenant identification signage approved by the Commission in other PUD and Design Review applications.³ The proposed height and location of the Signage is also proportional to the scale and mass of the Building. For the Commission's convenience, the Signage Plans also include the size, location, and other details on the lower-story signage previously approved by the Commission to serve as a holistic signage plan for the PUD going forward.

The proposed Signage is an important element for the Project. Because the Capitol Campus is located within the urban street grid and lacks traditional boundaries, signage is essential both as a wayfinding element and as a physical expression of campus identity. While the Capitol Campus signage plan includes ground-floor signage elements that perform these roles, upper-story signage provides an additional cue, not only for prospective students and visitors to the building but also for others who may not otherwise be aware of the University's Capitol Campus. The Signage also

¹ Other orders related to a modification and expansion of the existing building sought by the prior owner are not germane to the Application and have not been included here.

² See Z.C. Order No. 80-07E at Condition 1(g).

³ See, for example, Z.C. Order Nos. 06-11O/06-12O (2100 Pennsylvania Avenue NW), 18-22 (Parcel G in The Yards), and 20-28 (Parcel F in The Yards).

contributes to a sense of identity for Downtown East as a mixed-use neighborhood with a unique identity rather than just a mere extension of the central business district.

The University requests flexibility to modify the design and content of the Signage over the life of the building, with the understanding that any changes will remain consistent with the size, location, and type of signage shown on the Signage Plans.

II. The Application Satisfies the Evaluation Standards for a Modification

Pursuant to Subtitle Z, Section 703.6, redesign of architectural elements is considered to be a “modification without hearing” that does not require a public hearing. The Modification satisfies the applicable standard for review, which is that a public hearing is not required to evaluate the proposed design changes and the modification is consistent with the approved PUD.

Here, a public hearing is not required, as the proposed Modification does not materially change the use, height, density, or overall façade design from what was previously approved by the Commission. The Signage is a minor element that does not require additional flexibility or development incentives. The University desires to proceed expeditiously with installation of the Signage, and so the modification without hearing process will allow for an efficient approval of the requested changes.

The Signage will also further the goals of the PUD. Prior to construction of the Existing PUD, the Property was a Redevelopment Land Agency-owned site, and the intent of the PUD was to redevelop and activate a challenging site that was bounded by two broad avenues. The Signage is oriented toward and along the Massachusetts and New Jersey Avenue frontages of the building and will help mark the University’s re-activation of the Property, four decades after the construction of the original office building.

The Project will also further a number of Comprehensive Plan provisions, when viewed through a racial equity lens. (This analysis is not strictly required for a modification without hearing but the University has provided it out of an abundance of caution.)

Policy LU-1.2.1 Sustaining a Strong District Center: the Signage represents a reinvestment in an existing building and promotes the vitality of downtown as an active and thriving hub of diverse activity.

Policy LU-1.2.4 Urban Mixed Use Neighborhoods: the Property is centrally located between the Downtown East, Mount Vernon Triangle, and NoMA neighborhoods, and the Signage will mark the Capitol Campus as a presence and amenity for these neighborhoods.

Policy LU-3.3.3 Non-Profits, Private Schools, and Service Organizations: University expansion at a downtown site, rather than in a lower-density residential neighborhood, furthers goals of reducing institutional impacts on residential zones while also expanding opportunity for residents in all quadrants of the District.

Policy EDU-3.3.1 Satellite Campuses: The Property will accommodate the University's growth and spur additional economic development and investment in the surrounding neighborhoods.

The Signage will support the University's efforts to adaptively reuse the Property in furtherance of other recent plans such as the ***2023 DC Comeback Plan***, which calls for increasing education and research activities to draw students to the District, create jobs, and attract other private companies, and the ***2019 Downtown East Re-Urbanization Strategy***, through more attractive and engaging ground floor design and associated public spaces along Massachusetts and New Jersey Avenues. Both plans specifically identify the University's Capitol Campus as a key driver for building the District's knowledge economy and achieving these goals. Finally, the University's use of the Property fulfills a key component of the University's Hilltop Campus Plan, which is to leverage its decades-long investment in the East End and capitalize on new opportunities to grow its footprint downtown.

In furtherance of the Commission's racial equity focus, the University has reached out to ANC 6E regarding the Signage and expects to present them at an upcoming public meeting.

Filing Requirements

Application. The Application Signature Page is attached as Exhibit A.

Authorization Letters. A letter from the University authorizing Goulston & Storrs to file this request is attached as Exhibit B.

Prior Orders. Copies of Zoning Commission Orders No. 324, 80-07D, and 80-07E are attached as Exhibits C, D, and E.

Plans. Plans showing the proposed Modification are attached as Exhibit F.

Service on Parties. Pursuant to Subtitle Z, Section 703.13, the Applicant has served a copy of this application on ANC 6E, which is automatically a party to the case pursuant to Subtitle Z,

Section 403.5.⁴ As noted above, the Applicant has already commenced outreach to ANC 6E and looks forward to presenting to ANC 6E at its October meeting.

Conclusion

The University looks forward to the Commission's consideration of the application at an upcoming public meeting.

Very truly yours,

/s/
David Avitabile

cc: Kelly Blevins, Georgetown University
Cory Peterson, Georgetown University

Enclosure

⁴ While ANC 6C was a party to earlier actions involving the PUD, ANC 6C is no longer an affected ANC and so it does not need to be served pursuant to Subtitle Z, Section 703.10.

CERTIFICATE OF SERVICE

On September 2, 2025, I caused a copy of the foregoing letter and enclosure to be delivered by hand or electronic mail to the following:

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/s/ _____

David Avitabile