

**Georgetown University Hilltop Campus Plan Amendment, Further Processing, and
Related Relief - Boathouse**

Comprehensive Plan Policy Evaluation

Pursuant to Subtitle X § 101.12, as part of its review of the proposed Georgetown University Campus Plan amendment, and further processing application for the proposed Georgetown University boathouse, the Commission must consider the policies of the District Elements of the Comprehensive Plan (“Comp Plan”), to the extent they are relevant. The Commission’s consideration of relevant Comp Plan policies must include consideration of racial equity, in compliance with the Commission’s current Racial Equity Tool. *See* Subtitle Z § 302.10(m).

A. Relevant Comp Plan Policies

The Applicant has conducted a thorough evaluation of the Application, an amendment to and further processing of Georgetown University’s 2017 Campus Plan to authorize the construction of the Boathouse, including related requests for zoning relief, against relevant Comp Plan policies, including when viewed through a racial equity lens. Upon consideration, the Applicant finds that the Application will advance numerous Comp Plan policies within the Near Northwest; Land Use; Environmental Protection; Parks, Recreation, and Open Space; Urban Design, Historic Preservation; and Educational Facilities Elements.

i. Racial Equity and the Comp Plan

As part of its Comp Plan analysis, the Commission must consider the Application through a racial equity lens. 10-A DCMR § 2501.8. Equity is a primary focus of the Comp Plan, especially in the context of creating/increasing access to opportunity. The Framework Element states that equity is both an outcome and a process, and exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. 10-A DCMR § 213.6. The Comp Plan emphasizes that considerations of equity, and particularly racial equity, must be part of a District agency’s evaluation and implementation of Comp Plan policies and actions. The Commission does this by requiring Applicant’s to utilize the Commission’s Racial Equity Tool to help info their Comp Plan evaluation.

ii. Evaluation of Comp Plan Policy Guidance

Per Part I (Racial Equity Analysis Submissions – Guidance Regarding the Comprehensive Plan) of the Commission’s Racial Equity Tool, the Applicant conducted a thorough evaluation of the Application’s consistency with relevant policies of the Comp Plan. **Overall, the Applicant finds the Application to be not inconsistent with the Comp Plan. Regarding racial equity, the**

Applicant finds that the potential impacts and outcomes of the Application will largely be neutral as they relate to racial equity, with the potential for modest positive outcomes in increasing access to recreation and open space.

In accordance with guidance provided by the D.C. Court of Appeals, the Applicant was careful to identify any instances where the proposal may be viewed as being inconsistent with certain Comp Plan policies. **Upon review, the Applicant did not identify any potential inconsistencies between the proposed construction of the Boathouse and relevant Comp Plan policies that would warrant a balancing against Comp Plan consistencies.**

Table 1 below identifies the specific Comp Plan policies that are relevant and advanced by the Application, including specific policies identified in the Office of Planning’s Equity Crosswalk. The table is followed by a brief narrative that addresses each relevant Comp Plan element.

Table 1: Summary of Comp Plan Policies Advanced by the Proposed PUD Modification	
Policies in <u>bold underlined</u> text denote policies that are specifically referenced in the OP Equity Crosswalk as being explicitly focused on advancing equity.	
	<u>Near Northwest Area Element</u>
NNW-1.2.1, NNW-1.2.5, NNW-1.2.6, NNW-1.2.7, NNW-2.4.1	
	<u>Land Use Element</u>
LU-1.1.2, LU-1.2.8, LU-2.3.5, LU-3.3.1, LU-3.3.2, LU-3.3.3	
	<u>Environmental Protection</u>
E-4.4.2, E-4.4.3, E-4.4.1, E-3.2.3, E-3.2.6, E-3.2.7, E-3.4.2, E-1.1.6, E-2.2.1, E-2.3.3, E-6.1. E-2.2.4	
	<u>Parks, Recreation, and Open Space</u>
<u>PROS-1.3.7</u> , PROS-3.1.F, PROS-3.2.4, PROS-3.2.5, PROS-3.2.6, PROS-3.2.7, PROS-3.1.7, PROS-3.2.1	
	<u>Urban Design Element</u>
UD-1.3.1, UD-1.3.2, UD-1.3.3, UD-1.3.4, UD-1.3.5	
	<u>Historic Preservation Element</u>
HP-2.5.3, HP-2.5.4	
	<u>Educational Facilities</u>
EDU-3.2.2, EDU-3.3.2, EDU-3.3.11	

Near Northwest Area Element

The Application and Boathouse project is consistent with several policies contained within the Near Northwest Area Element. Through a partnership between the Applicant, NPS, and the District, the Application will greatly improve the University’s rowing facilities while

simultaneously improving public access to the waterfront, improving the aesthetic quality of a portion of the Potomac shoreline, expanding recreation opportunities, maintaining the existing bike lane from the Georgetown Waterfront Park to the Capital Crescent Trail, improving transportation safety along Water Street, and advancing implementation of the NPS Georgetown Nonmotorized Boathouse Zone (the “GNBZ”) (NNW-1.2.1, NNW-1.2.5, NNW-1.2.6, NNW-1.2.7, NNW-2.4.1)

Land Use Maps

The Property is located in the Parks, Recreation, and Open Space category on the Future Land Use Map (“FLUM”) and in the Neighborhood Conservation Area category on the Generalized Policy Map (“GPM”). The Application is not inconsistent with either designation, as it enhances the aquatic recreation uses along the Georgetown Waterfront and allows for the infill development of an underutilized site with a new boathouse that is compatible with existing scale and character in the immediate area.

Land Use Element

The Application will advance several policies in the Land Use Element. Through close coordination and engagement with the community, the University will construct a new state-of-the-art boathouse facility that will meet its longstanding needs while providing increased waterfront access and minimizing impacts on the community. The Boathouse project will transform a previously disturbed yet underutilized waterfront site within the area of the GNBZ that will bring new activity to the western end of Water Street, helping to connect Georgetown Waterfront Park to the Capital Crescent Trail (LU-1.2.8, LU-2.3.5). The Boathouse will improve the environmental quality of the site through new low impact stormwater management, including bioretention, and other sustainability features and green building methods (LU-3.3.2) and the Applicant is working in close coordination with the Department of Energy and the Environment (“DOEE”) regarding the resilient design of the Boathouse (LU-1.1.2). Through coordination with the community, the University has minimized the potential impacts to the community in terms of transportation, noise, and the environment. Indeed, the Boathouse project will improve safety and circulation along Water Street adjacent to the site through expanded sidewalks, reduction of potential vehicle conflict points, and extension of the on-street two-way bike lane from the western end of Georgetown Waterfront Park to the beginning of the Capital Crescent Trail (LU-3.3.1, LU-3.3.3).

Environmental Protection Element

Overall, the Boathouse project is consistent with the Environmental Protection Element, and will in fact advance several of these policies. As noted in the Applicant’s statement, the Boathouse has been in the making for many years, and has involved extensive engagement between the University, multiple Federal and District agencies, and the general public. Notably,

the process leading up to the Applicant’s submission of the Boathouse to the Commission goes as far back as 2016, with the NPS NEPA and Section 106 processes related to the GNBZ, which includes the Boathouse site (Site D). These processes were carried out by NPS in a very transparent manner, and involved multiple opportunities for meaningful public engagement and comment (E-4.4.2, E-4.4.3). The NEPA process thoroughly analyzed the potential impacts of the GNBZ, including construction of a boathouse on Site D, on the human environment, including impacts on water resources, historic districts and structures, land use and accessibility, transportation, and visitor use and experience. The NEPA process ended in the NPS issuing a Finding of No Significant Impact which, in addition to positive impacts, also includes specific measures that will effectively mitigate any potential negative impacts (E-4.4.1).

The Boathouse design integrates several sustainability and climate resilience strategies (E-3.2.3, E-3.2.6, E-3.2.7, E-3.4.2). Regarding floodplain, the elevation at which the Boathouse will be constructed meets the District’s requirements for sites located within a “tidal shoreline buffer” area, which is defined as an area that is projected to be inundated by daily tides by 2080, which account for approximately 3.4 feet of sea level rise. As it relates to the Boathouse site, this means the Boathouse will be constructed 3.4 feet above the elevation of the 500-yr floodplain. The lower level of the Boathouse also does not contain any critical facilities, and will be properly floodproofed in accordance with District floodplain rules. The NPS NEPA process concluded that potential impacts on floodplains would be minimal because of construction techniques used. As such, despite its location in the floodplain, construction of the Boathouse will not pose any public health and safety hazards in the event of a flood (E-1.1.6).

Construction of the Boathouse will also help improve environmental conditions along the Potomac River by incorporating sustainable stormwater management practices and reducing sedimentation. Currently, the site does not contain any stormwater management. As part of the project, the University will construct onsite bioretention that will meet applicable retention requirements under District stormwater regulations, which will reduce direct runoff and sedimentation in the river (E-2.2.1, E-2.3.3, E-6.1.3).

Parks, Recreation, and Open Space Element

The proposal advances several policies within the Parks, Recreation, and Open space Element. The partnership between the University, NPS, and the District in and of itself is consistent with the Comp Plan’s support for administrative transfers of federal land for conservation and recreational purposes (PROS-3.1.F). Here, the agreement between the University, NPS, and the District will facilitate the long-anticipated construction of a new boathouse for the University, which will also include improved waterfront visibility and expanded access to the waterfront for recreational boating (PROS-1.3.7, PROS-3.2.4, PROS-3.2.5, PROS-3.2.6, PROS-3.2.7). In consultation with the Old Georgetown Board (“OGB”) and the U.S. Commission of Fine Arts (“CFA”), as well as the community, these improvements - the Boathouse, Public Access Dock,

Primary Dock, and related streetscape and shoreline improvements – have been designed to complement and respect the scenic and ecological value of the waterfront and the historic value of the Georgetown neighborhood (PROS-3.1.7, PROS-3.2.1)

Urban Design Element

Overall, the proposed Boathouse is consistent with the policies of the Urban Design Element. Recognizing that the proposed Boathouse will be highly visible from the water as well as along Water Street, the University has paid close attention to the design of the building on all sides. It will add to the range of unique waterfront experiences along the Potomac River, and strengthen the physical and visual connections between the Capital Crescent Trail and Georgetown Waterfront Park (UD-1.3.1, UD-1.3.5). Through the partnership between the University, NPS, and DMPED, the University will activate and improve the aesthetic quality of a long underutilized site along the shoreline, and help advance implementation of the NPS GNBZ. While being constructed by the University, the Boathouse will include a Public Access Dock that will be available at all times for small nonmotorized watercraft launch, and the Primary Dock will also be available when it is not in use by the University (UD-1.3.2). Currently, the Boathouse site is partially paved without any permanent structures, and is primarily used for non-motorized boat storage. As such, the site does not contain any stormwater management, and surface runoff likely flows directly into the river. As a result of the project, the aesthetic and environmental quality of the site will be significantly improved. Specifically, the project will incorporate sustainable stormwater best practices, such as bioretention, that will meet or exceed the District’s stringent onsite stormwater retention requirements. Additionally, the design of the proposed Boathouse integrates flood-resilient building and site design methods that will help mitigate potential impacts from flooding (UD-1.3.3, UD-1.3.4).

Historic Preservation Element

The Boathouse project is consistent with the policies of the Historic Preservation Element. The Boathouse site is located along the south edge of the Georgetown Historic District, separated from the most dense part of the historic district by the Key Bridge, Whitehurst Freeway, and C&O Canal. The Boathouse site and adjacent sites, including the Washington Canoe Club, have been used for boathouse / recreation-type uses since the early-1900s. The Boathouse has received conceptual approval from the OGB and CFA, who both expressed strong support for the architectural design. In its July 2025 review, OGB expressed strong support for the design, commenting positively on the appropriateness of the massing and materiality. In a later review, OGB stated that the design, massing, and scale of the Boathouse are in keeping with the nearby Washington Canoe Club and Potomac Boat Club buildings, as well as with general historic boathouse typology. They noted that while the neighboring boathouses are clad in wood, the use of stone on the proposed Boathouse was appropriate given the heft of Key Bridge and the stone

Alexandria Aqueduct ruins close by (HP-2.5.3, HP-2.5.4). At its meeting on March 19, 2026, CFA approved the concept design for the Boathouse, describing the proposed design as very beautiful.

Educational Facilities Element

The Application is consistent with policies of the Educational Facilities Element that promote corporate citizenship by large institutions and increasing access to recreation and cultural opportunities. Due to its prominent location along the waterfront and within the historic Georgetown neighborhood, the University is proposing a very high-quality design for the Boathouse that has received approval from OGB (EDU 3.2.2, EDU-3.3.2). Aligned with the University's commitment to sustainability, the Boathouse design also incorporates sustainable stormwater management and other green building strategies. Through close coordination and engagement with the community, increasing public access to the waterfront has been incorporated into the Boathouse project. Specifically, a new Public Access Dock will be constructed that will be available for nonmotorized watercraft (kayak, canoe, standup paddleboard) launch at all times, and the Boathouses Primary Dock will be available to the public when not in use by the University. Through coordination with the community, the University has minimized the potential impacts to the community in terms of transportation, noise, and the environment. Indeed, Boathouse project will improve safety and circulation along Water Street adjacent to the site through expanded sidewalks, reduction of potential vehicle conflict points, and extension of the on-street two-way bike lane from the western end of Georgetown Waterfront Park to the beginning of the Capital Crescent Trail (EDU-3.3.11).

1. Racial Equity as a Process

The Framework Element states that racial equity is a process, and that as the District grows and changes, it must do so in a way that builds the capacity of vulnerable, marginalized, and low-income communities to fully and substantively participate in decision-making processes. 10-A DCMR § 213.7. As a process, a racial equity lens is employed when those most impacted by structural racism are meaningfully involved in the creation and implementation of the policies and practices that impact their lives. The Commission's Racial Equity Tool emphasizes community outreach and engagement, which are expected to begin at the inception of any proposed zoning action. All submissions to the Commission shall be accompanied by a discussion of efforts taken by applicants to engage the community early in the zoning process. The information contained in **Table 2** addresses the questions set forth in **Part II (Community Outreach and Engagement)** of the Racial Equity Tool. As demonstrated below, the Applicant has engaged with the community, and it will continue to do so during the Boathouse development process.

Table 2: Community Outreach and Engagement
Description of affected community (including defining characteristics).
<p><u>Affected Community:</u> The affected community for the Hilltop Campus is well-defined by the Georgetown Community Partnership (“GCP”), which includes representatives of both ANC 2E and ANC 3D, the ANCs covering the Hilltop Campus, as well as the Citizens Association of Georgetown, the Burleith Citizens Association, and the Foxhall Community Citizens Association, which represent the residents of the surrounding residential neighborhoods, and the Georgetown University Student Association, which represents the students who live on and near the Hilltop Campus. The makeup of the GCP also reflects the parties to prior Campus Plan proceedings. In addition, other smaller neighborhoods proximate to the Hilltop Campus, and specifically the Boathouse site, are part of the potentially affected community. For similar reasons, the nearby Capital Crescent Trail, managed by the National Park Service, is a potentially affected area.</p> <p><u>Defining Characteristics:</u> The defining characters of the community that is immediately around the Boathouse site include moderate-scale compact residential uses, moderate-scale M Street commercial corridor, open space (including Capital Crescent Trail and Georgetown Waterfront Park), and the Hilltop Campus.</p>
Characteristics of the affected community that influenced outreach plan / efforts.
<p>The characteristics of the affected community that influenced outreach are their proximity to the Boathouse site as well as longtime participation in the GCP as well as in prior Campus Plan proceedings.</p> <p>In addition to engagement through the GCP process and with other proximate stakeholders, the University mailed out a notice of intent on February 27, 2026 to all owners within 200 feet regarding the Application and presented the Application at regularly-scheduled ANC 2E and ANC 3D meetings. Finally, the University coordinated with representatives of NPS and the D.C. Deputy Mayor for Planning and Economic Development (“DMPED”) regarding the Application.</p>
Community outreach timeframe / dates of major meetings and points of engagement
<p>The Boathouse has been in the making for many years, and the University has had the opportunity for extensive engagement.</p> <p>Well before the Applicant set out the design the Boathouse, there was extensive public engagement during the 2016 NPS process to prepare the environmental assessment (“EA”) for the GNBZ under the National Environmental Policy Act (“NEPA”), which analyzed the potential impacts of the GNBZ on the human environment. NPS carried out the EA process simultaneously with its Section 106 process under the National Historic Preservation Act (“NHPA”), which specifically evaluated the potential effects of the GNBZ on historic properties. The NEPA and NHPA processes followed an extensive process carried out by NPS in 2011 to prepare a feasibility study for the non-motorized boathouse zone along the Georgetown waterfront.</p>

Leading up to this Application, outreach occurred through a series of meetings and discussions with District and Federal agency representatives, and representatives of each of the affected community groups. The University has met weekly with representatives of DMPED and the NPS, and has met with representatives of DDOT, OP, and DOEE. The University presented the Boathouse project to OGB in July 2025 and March 2026, at which time concept approval was granted. The Boathouse project received concept approval from CFA on March 19, 2026.

The Applicant has regularly engaged with both ANCs and other community stakeholder groups, including presentations to ANC 2E and ANC 3D. The Applicant has also remained in close contact with the other associations that are members of the GCP, as well as other stakeholders including the Georgetown Business Improvement District, the Potomac River Access Coalition, and Georgetown Heritage. The Applicant has also discussed the project with immediate neighbors, including the Potomac Boat Club, the Washington Canoe Club, and other adjacent properties.

Members of the affected community that would potentially benefit by the proposed zoning action.

Georgetown University student members of the women’s and men’s rowing teams. Members of the general public will also potentially benefit through availability of the Public Access Dock that will be available for public use at all times, and the Primary Dock when not in use by the University.

Members of the affected community that would potentially be burdened by the proposed zoning action.

Users of the existing Potomac Boat Club may experience an increase in pedestrian congestion while accessing the general area, as well as an increase in non-motorized boat activity along the immediate shoreline.

Potential positive outcomes of the proposed zoning action identified by the affected community.

Members of the University’s women’s and men’s rowing teams will benefit from the Boathouse as they will have greater flexibility to schedule practices, coordinate regattas, and a dedicated facility within which to store their shells and other equipment. The affected community also is very supportive of the additional shoreline access that will be provided by the Public Access Dock and Primary Dock.

Potential negative outcomes of the proposed zoning action identified by the affected community.

The affected community expressed concerns about the loss of parking along Water Street west of 34th Street, impacts to access to the Capital Crescent Trail, and the potential for pedestrian – bicyclist conflicts along Water Street. The loss of parking along Water Street is not something that is under the Applicant’s control, but rather is something that falls under DDOT’s jurisdiction, and is planned in order to reduce conflicts between vehicles, pedestrians, and cyclists.

Changes / modifications made to the proposed zoning action that incorporate / respond to input received from the affected community.
In response to feedback from ANC 2E and other stakeholders, the University expanded the size of the public access dock, coordinated with DDOT regarding the configuration of Water Street, agreed to secure off-site parking for coaches, and developed the short-term bicycle parking and landscaping plan for the Project.
Input received from the affected community not incorporated into the proposed zoning action.
Not applicable. The University has made changes to the Boathouse project in response to any and all feedback received.
Efforts taken to mitigate potential negative outcomes identified by the affected community.
In close coordination with DDOT, the University will locate the loading area for shells on the north side of Water Street in order to allow the bike lane to remain on the south side of the street, maintaining connection from the Capital Crescent Trail to the Georgetown Waterfront Park.

2. Racial Equity as an Outcome

As an outcome, racial equity is achieved when race no longer determines one’s socioeconomic outcomes, and when everyone has what they need to thrive no matter where they live or their socioeconomic status. 10-A DCMR § 213.9. **Table 3** considers the Application and Boathouse relative to any anticipated positive and negative impacts and/or outcomes to racial equity. Upon consideration, any impacts / outcomes resulting from the proposal are likely to be neutral as they relate to racial equity, with the potential for modest positive outcomes in physical improvements and access to economic opportunity.

Table 3: Evaluation of Zoning Action Through a Racial Equity Lens	
Direct Displacement	The proposed Boathouse will not cause direct residential displacement as the site does not contain any residential use. The Property is currently used by the Key Bridge Boathouse, which is expected to be relocated to Site C of the GNBZ, just west of the Aqueduct Bridge.
Indirect Displacement (Economic and Cultural)	The proposed Boathouse will not lead to indirect economic or cultural displacement within the immediate area. Indirect displacement occurs when new uses significantly alter neighborhood dynamics or raise property values and rents, resulting in long-standing residents or businesses having to move out or close down. In this case, the Boathouse project is a specialized use that is primarily associated with the University and thus will not trigger any growth in the area that has the

	potential to increase property values and cause indirect displacement. Additionally, the Boathouse will not cause cultural displacement. In contrast, the Public Access Dock and Primary Dock will increase access to the shoreline and waterfront for all populations and cultures.
Housing	The Application and Boathouse project will not cause any changes or have any impact on housing.
Physical	The Boathouse project will result in positive changes to public space, streetscape, infrastructure, and the environment. As part of the project, the public space and streetscape along Water Street on the north side of the Boathouse will be improved. The sidewalk along the entire street frontage of the project side will be reconstructed and widened, and the two-way on-street bike lane that runs along Georgetown Waterfront Park will be extended to connect to the Capital Crescent Trail. The site currently does not have any stormwater management, with surface runoff leading directly into the Potomac River. The project will install new stormwater management, including bioretention, that will be designed to meet the District’s stringent retention requirements.
Access to Opportunity	The Application and Boathouse project are not expected to increase or decrease access to opportunity.
Community	The Applicant has coordinated with the affected community throughout the planning and design processes for the Boathouse. The community was also provided with substantial opportunity to participate in NPS’ NEPA and Section 106 processes for the GNBZ.