

July 14, 2026

**VIA IZIS**

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

**Re: Z.C. Case No. 16-18J: Georgetown University Hilltop Campus Plan –  
Application for Modification without Hearing to Conditions of Approval:  
Fall 2026 Enrollment Adjustments**

Dear Chairperson Hood and Members of the Commission:

Georgetown University (the “**University**”) hereby requests a modification without hearing (“**Modification**”) to the 2017-2036 Georgetown University Hilltop Campus Plan (“**Campus Plan**”), which was approved by the Zoning Commission in Z.C. Order No. 16-18 (“**Campus Plan Order**”). Briefly, the Modification will alter conditions regarding enrollment as summarized below:

- Traditional Undergraduate Program Enrollment: Modification to Condition 10 to allow for a 100-student increase in the Traditional Undergraduate Program enrollment cap, along with the addition of a new Condition 12B to create a mechanism that will scale back the increase if the number of students living in the neighborhoods surrounding the Hilltop Campus are not maintained at a certain level; and
- Medical Student Program Enrollment: Modification to Condition 11 to allow for an 80-student increase in the Medical Student Program over a four-year period.

The Modification allows the University to respond to changes in enrollment patterns created by external forces and address the economic impact of those changes by adjusting the size of its undergraduate and medical student programs. However, the Modification does not alter the overall enrollment headcount for the Hilltop campus, which remains at 14,106 students. The University has committed to continue to work with representatives of the surrounding community to ensure that these enrollment adjustments do not result in objectionable impacts in the Georgetown, Burleith, and Foxhall neighborhoods.

The agent authorization letter is attached as Exhibit B. A copy of Z.C. Order No. 16-18 is attached as Exhibit C. This modification request is made pursuant to Subtitle Z, Section 703 of the Zoning Regulations.

1. Background

The Campus Plan was approved by the Zoning Commission on December 1, 2016. The Campus Plan was developed through the Georgetown Community Partnership (“GCP”), and it was supported by both Advisory Neighborhood Commission (“ANC”) 2E and ANC 3D, the Citizens Association of Georgetown (“CAG”), the Burleith Citizens Association (“BCA”), the Foxhall Community Citizens Association (“FCCA”), and the Georgetown University Student Association (“GUSA”)—all of which participate in the GCP—as well as the Office of Planning (“OP”) and the District Department of Transportation (“DDOT”).

2. Modification to Condition 10 and Addition of Condition 12B: Traditional Undergraduate Program Limit

Pursuant to the Campus Plan, the Hilltop Campus is subject to enrollment limits on the overall campus headcount as well as on the number of students in traditional undergraduate programs (“**Traditional Undergraduate Program**” students). While there is still room to increase enrollment under the overall headcount limit, there is no available capacity under the Traditional Undergraduate Program student headcount cap. Therefore, the University proposes the following modification to allow for a 1.5% increase in the 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”).

Concurrent with this increase, the University also proposes a reporting mechanism that will roll back this increase toward the current 6,675-student limitation in the event that the enrollment increase results in an increase in the number of Traditional Undergraduate Program students living in the Georgetown, Burleith, and Foxhall neighbors beyond an agreed-upon number of 970 students.

**12B. Beginning in Spring 2028, should the number of Traditional Undergraduate Program students known to be living in the Georgetown, Burleith, and Foxhall**

**neighborhoods (“Neighborhoods”) reported in the Spring 2028 semester Enrollment and Housing Report exceed 970 students, the Traditional Undergraduate Program student headcount maximum set forth in Condition 10 (“TUP Maximum”) shall be reduced by 25 students for the 2028-2029 academic year. If the number of Traditional Undergraduate Program students known to be living in such Neighborhoods continues to exceed 970 students in Spring 2029, the TUP Maximum shall be reduced by an additional 25 students, and shall be evaluated in the same manner in subsequent academic years, 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.**

### *Discussion*

Over the past decade, the University and the community members of GCP have worked to manage the impacts associated with Traditional Undergraduate Program students in the surrounding neighborhoods through both continued investment in marketable and competitive on-campus housing options that attract more seniors to live on campus for all four years of their time at the Hilltop and continued implementation of effective measures to mitigate the impacts of students who live off campus. Furthermore, the University has completed the construction of Hayden and Byrnes Halls (approved in Z.C. Case No. 16-18D), which delivered additional student housing for juniors and seniors, exceeding the 244-bed requirement five years prior to the deadline set forth in Condition 5 of the Campus Plan.

Based on these factors, the University and community members of the GCP agree that it is appropriate to allow for an increase in the Traditional Undergraduate Program headcount by 100 students, to 6,775 students. The increased housing inventory created by Hayden and Byrnes Halls, among other factors, has created capacity in the other University residence halls that could immediately absorb the additional 100 undergraduate students that would be admitted. Further, the University will support its investment in on-campus housing with additional policies to encourage students to remain on campus for a fourth year, which may include but not be limited to the following:

- Offering a two-year housing assignment for rising juniors, providing certainty and continuity in their housing assignments;

- Meal plan subsidies;
- Fee rebates for early housing commitments; and
- Preferential housing assignments.

Notwithstanding the foregoing, if for some reason the combination of additional housing and supportive policies is less effective than expected, and the number of Traditional Undergraduate Program students living in the neighborhood exceeds 970 students in Spring 2028, under the enrollment and housing reporting mechanism discussed above, the University will incrementally scale back its Traditional Undergraduate Program enrollment to current levels—and phase in the increase again once the neighborhood population returns below the 970-student threshold.

In addition to investment in on-campus housing, the University has and continues to work collaboratively with the GCP to develop programs and initiatives to successfully mitigate the impacts of students who live in the neighborhood. Most notably, to address longstanding community concerns regarding undergraduate student parking in the surrounding neighborhoods of Georgetown, Burleith, and Foxhall, the University has undertaken several initiatives to communicate the parking restrictions, encourage compliance, and develop both conduct sanctions and an enforcement program. These include:

- A communications campaign to increase awareness of the parking prohibition among undergraduate students and their families by consistent and continued messaging throughout a student's time at Georgetown.
- A schedule of sanctions for violations of the parking prohibition. The sanctions are designed to align with those applicable to other neighborhood-related violations addressed through the Code of Student Conduct.
- An enforcement program that will utilize License Plate Reader (LPR) technology and DMV registration data associated with student addresses, following student acknowledgment of the prohibition and notice of the use of registration information for enforcement purposes, to identify vehicles associated with undergraduate students parked within the prohibited areas of Burleith, Foxhall, and Georgetown.

In sum, the additional housing constructed at Hayden and Byrnes Halls, coupled with the University's investment in on-campus housing and off-campus mitigation measures, will ensure that the modest 1.5% increase in the Traditional Undergraduate Program will not result in an attendant increase in the number of students living in the neighborhoods or objectionable impacts of additional students on the neighborhoods.

### 3. Modification to Condition 11: Medical Student Program Headcount

The Hilltop Campus is also subject to an enrollment limit on its Medical Student Program, which is currently at its maximum number. To mitigate financial risks arising from recent federal

administration actions and address the widening national physician shortage, the School of Medicine proposes a strategic increase on the current cap on medical students by 80 students over a four-year phase-in period, as set forth below.

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.

The University's medical school is the nation's most applied-to medical school—receiving nearly 16,000 applications annually—and so the additional demand can be accommodated without compromising the School of Medicine's focus on training students who care for the whole person. The enrollment adjustment is mission-critical for meeting the complex healthcare needs of an aging population and will fortify the University's affiliation with MedStar Health by scaling a clinical pipeline where 25% of graduates already remain to serve the region. As with the above, increasing the size of this group will not threaten the overall cap of 14,106, given the unused capacity for graduate students.

To ensure the increase in the Medical Student Program enrollment will not be objectionable to the surrounding neighborhoods, the University will extend existing off-campus policies to these students, including:

- New student orientations around university and community expectations for off-campus living;
- A structured student conduct process, including sanctions, for noise, trash, recycling, and property maintenance issues as well as reporting local addresses; and
- A requirement to register vehicles with the University.

Further, to avoid potential impacts on neighborhood parking associated with the enrollment adjustment, the University will also provide on-campus parking spaces for medical students equal to the incremental increase in enrollment. These spaces shall be provided from the University's parking inventory that is currently well below the parking cap set forth in the Campus Plan.

4. Modification Request and Satisfaction of the Standards for Approving a Modification without Hearing

Section 703 of Subtitle Z of the 2016 Zoning Regulations establishes the standards and requirements for approval of modifications without a public hearing. Section 703.6 establishes such modifications those “in which impact may be understood without witness testimony” and notes that changes to conditions and changes in positions on issues discussed by the Commission are able to be considered without a hearing.

Here, the University seeks to modify three conditions that will adjust the maximum number of students under its Traditional Undergraduate Program and Medical Student Program headcounts. Importantly, the University will maintain the overall Hilltop Campus headcount. Therefore, there will be no net increase in the overall number of students permitted under the Campus Plan.

Further, the University has worked collaboratively with community parties in the GCP to develop additional mitigation measures that will be integrated into its ongoing quality of life initiatives. The University has also agreed to enrollment management measures, including a gradual phase-in for the Medical Student Program increase and a mechanism to reduce undergraduate enrollment if the number of undergraduate students living in the surrounding neighborhoods exceeds an agreed-upon threshold. Therefore, the changes to the undergraduate and medical school programs are not likely to create objectionable conditions in the surrounding residential neighborhoods.

Accordingly, the adjustments to the enrollment maximums are consistent with the standards for approval of a university use in a residential zone.

The University has discussed the proposed enrollment modifications with the GCP, and a letter from the GCP regarding the proposal is attached as Exhibit D.

Service on Parties

Parties to the Campus Plan include ANC 2E, ANC 3D, CAG, BCA, FCCA, and GUSA. In satisfaction of Section 703.10 of Subtitle Z, all of the parties have been served with this application. (See attached Certificate of Service). The University has discussed the matter with the parties through the GCP as well as with GUSA leadership, who is supportive.

Exhibits

The following exhibits are attached in support of this Application.

Exhibit A –Form 100 Signature Page

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Exhibit B – Agent Authorization Letter

Exhibit C – Z.C. Order No. 16-18

Exhibit D – GCP Letter in Support

A check in the amount of \$520 will be sent via courier to your office.

5. Conclusion

The proposed adjustments to the enrollment conditions are permitted as a modification without hearing because they may be easily understood without witness testimony. The changes to the enrollment maximums are otherwise consistent with the Zoning Commission's previous approval of the Campus Plan, and it will not result in objectionable impacts to the surrounding residential community. Accordingly, we request that the Commission approve the changes set forth herein.

Please feel free to contact the undersigned if you have any questions or comments regarding this modification without hearing application

Sincerely,

/s/ David M. Avitabile

David M. Avitabile

Enclosures

## **Certificate of Service**

I hereby certify that copies of the foregoing documents were sent via First Class or electronic mail to the following addresses on July 14, 2026.

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/s/ David Avitabile  
David Avitabile