David Avitabile
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(202) 721-1137 (tel)

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. <u>The Application Satisfies the Evaluation Standards for a Modification</u>

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:

Jennifer Steingasser
Office of Planning
jennifer.steingasser@dc.gov

Joel Lawson
Office of Planning
joel.lawson@dc.gov

Erkin Ozberk
District Department of Transportation
erkin.ozberk@dc.gov

Noah Hagen
District Department of Transportation
noah.hagen@dc.gov

ANC 6E
c/o Ahmad Abu-Khalaf, Chairperson
6E05@anc.dc.gov

Davina Carson, ANC 6E07
6E07@anc.dc.gov

Dale Prince, ANC 6E08
6E08@anc.dc.gov

/s/ _____

David Avitabile

EXHIBIT A

(Revised 8/6/19)

BEFORE THE ZONING COMMISSION
FOR THE DISTRICT OF COLUMBIA

FORM 100 – APPLICATION SIGNATURE PAGE

All Zoning Commission applications shall be filed through the Interactive Zoning Information System (IZIS). Pursuant to Subtitle Z §§ 300.5, 301.4, and 302.4, please use Form 100 to provide the name(s), address(es), and signature(s) of each owner of property included in the area to be developed, or of the owner's authorized agent.

PUD: ☐ 1st Stage ☐ 2nd Stage ☐ Consolidated		Modification: ☐ Minor ☑ Consequence ☐ Significance	
☐ Map Amendment	☐ Design Review	☐ Campus Plan	☐ Time Extension

I/We hereby certify that the information contained on the application for the relief filed with the Zoning Commission is true and correct to the best of my/our knowledge, information, and belief. Any person(s) using a fictitious name or address and/or knowingly making any false statement on this application/petition is in violation of D.C. Law and subject to a fine of more than $1,000 or 180 days' imprisonment or both. (D.C. Official Code § 22 2405.)

Owner's Name:	Georgetown University		
Owner's Address:	3700 O Street NW, Washington, DC 20037		
Owner's Signature:	*Authorized Agent	**Date:**	9/2/2025

Owner's Name:			
Owner's Address:			
Owner's Signature:		**Date:**	

Owner's Name:			
Owner's Address:			
Owner's Signature:		**Date:**	

Owner's Name:			
Owner's Address:			
Owner's Signature:		**Date:**	

Owner's Name:			
Owner's Address:			
Owner's Signature:		**Date:**	

Owner's Name:			
Owner's Address:			
Owner's Signature:		**Date:**	

Owner's Name:			
Owner's Address:			
Owner's Signature:		**Date:**	

ANY APPLICATION THAT IS NOT COMPLETED IN ACCORDANCE WITH THE INSTRUCTIONS ON THIS FORM WILL NOT BE ACCEPTED.

EXHIBIT B

GEORGETOWN UNIVERSITY
Office *of the* Chief Operating Officer

August 29, 2025

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

Re: Application of Georgetown University for Approval of a Modification without Hearing to Z.C. Case No. 80-07 – 111 Massachusetts Avenue NW (Square 563, Lot 16) (the **"Property"**) – Letter of Authorization

Dear Chairperson Hood and Members of the Commission:

By this letter, Georgetown University, the owner of the Property referenced above, hereby authorizes the law firm of Goulston & Storrs PC to represent it in all matters before the Zoning Commission concerning the above-referenced Application.

Sincerely,

Georgetown University

By: _____
Name: David B. Green
Title: Senior Vice President, COO and Treasurer

EXHIBIT C

Government of the District of Columbia

ZONING COMMISSION

ZONING COMMISSION ORDER NO.324
CASE NO. 80-7C
NOVEMBER 13, 1980

Pursuant to notice, a public hearing of the District of Columbia Zoning Commission was held on September 29, 1980. At this hearing session, the Zoning Commission considered an application from the District of Columbia Redevelopment Land Agency for approval of a consolidated Planned Unit Development under the provisions of Sub-section 7501.32 of the Zoning Regulations. No change of zone is requested.

FINDINGS OF FACT

1. The subject application is a request for consolidated review and approval of a Planned Unit Development (PUD) on Lots 14, 15, 801-812, 815, 820-831, and a public alley to be closed, all in Square 563. Also included with the original application was a request for use of public space over a portion of 2nd Street, between "H" Street and Massachusetts Avenue, N.W. Together the applications provided for an office building to be built and occupied by the Union Labor Life Insurance Company.

2. Originally, the applicants requested a hearing for a PUD combined with the Use of Public Space over a portion of 2nd Street, N.W. When the Zoning Commission reviewed that request at its meeting of July 10, 1980 to determining whether the matter should be set for hearing, the Commission indicated that it had some difficulties with the use of public space as the building was then designed. The applicants, in response to the Commission's decision, amended the application to withdraw the request for approval of the use of public space. Thus the proposal now before the Commission is for a consolidated PUD review for a building 101 feet high, with 6.5 FAR in the C-3-C District.

ZONING COMMISSION
CASE No. 80-7C
EXHIBIT No. 44

ZONING COMMISSION
District of Columbia
CASE NO. 80-7D
EXHIBIT NO. 26

3. The site consists of the entire Square 563, also known as Parcel 44 in the Northwest No. 1 Urban Renewal Area, which is bounded by Massachusetts Avenue, New Jersey Avenue, "H" Street and 2nd Street, N.W., and included 35,336 square feet. The property is presently owned by the District of Columbia Redevelopment Land Agency and it is proposed to be developed by the Union Labor Life Insurance Company as its headquarters building. The site is located between the two broad Avenues, each 160 feet in width, and the Center Leg Freeway area, is relatively flat and is at a lower elevation than the Capitol, Union Station or Mt. Vernon Square. The adjacent squares are presently developed with parking lots, the Freeway and parks.

4. The site is currently zoned C-3-C which permits a high bulk business and employment center for office and retail commercial uses to maximum floor area ratio of 6.5 and a maximum height of ninety feet. Additional height and density may be permitted by the Zoning Commission under the Planned Unit Development process.

5. The application does not request a change in the C-3-C zoning nor an increase in the permissible FAR of 6.5. It is a request for an increase in the height to permit flexibility of design within the 6.5 FAR limitation and permit the building mass to be articulated to enhance the exterior of the building and improve the quality of the interior space. The increased height is appropriate for this site lying as it does between Massachusetts Avenue and New Jersey Avenue, both of which are 160 feet in width.

6. The proposed building would occupy the entire square and the eleven foot height increase permits a superior design solution, which has been acheived. The 101 foot building height permits an eight story building and provides a flexibility to shape the building to create amenities, both exterior and interior. The provision of courts on the Massachusetts Avenue, New Jersey Avenue and 2nd Street frontages of the building enhances the exterior of the building by relieving and adding interest to the facades. The courts also enhance the interior of the building by reducing the distances from central areas to window exposure.

7. Development on the site is governed by both the Zoning Regulations and the Urban Renewal Plan for Northwest No. 1 Urban Renewal Area, which Plan is presently being modified to permit a maximum height of 120 feet.

8. The development proposes 293 parking spaces in the second and third cellars, of which 157 spaces will be within the site and 136 will be in vault space. Four loading berths are proposed to be located on the ground floor.

9. The Redevelopment Land Agency acquired the site during the 1960's and it has been available for development for about ten years. The RLA now has selected the subject applicant as the developer for disposition parcel 44 to proceed in accordance with the Urban Renewal Plan. Amended urban renewal standards were considered and approved by the National Capital Planning Commission on June 26, 1980. The Council of the District of Columbia Committee on Housing and Economic Development reported favorably on the changes on September 10, 1980 and the first reading of the Renewal Plan Amendments was scheduled for October 14, 1980.

10. The architect for the applicant, Vlastimil Koubek, testified that the design of the proposed project, including the urban design comcepts employed, will provide a superior environment due to the quality of materials used and the design and provision of amenities in the building. Mr. Koubek also testified that the building should not be set back above the ninety foot height, and that a straight facade would present a better appearance. He supported this position by pointing out the topographic depression in Massachusetts Avenue at the subject site and the isolation of the site in relation to other buildings existing or expected to be built in the area. Mr. Koubek concluded by stating that he was in agreement with the DOT report dated September 24, 1980, which recommended 293 total parking spaces and three loading berths, one for large trucks and two for smaller trucks. The Commission agrees with the findings and conclusions of Mr. Koubek.

11. Arthur Fawcett, city planner for the applicant, testified concerning the relationship of the project to Article 75 of the Zoning Regulations and compliance with the various Sub-sections of the regulations. He also commented on project planning and urban design; the relationship to the Urban Renewal Plan and the Goals and Policies Act; and related the project to public facilities. Mr. Fawcett also stated that the proposal to setback the building above the ninety foot height may be too rigid for this situation. The Commission finds that the application meets the final requirements of Article 75 as set forth in the regulations.

12. Louis P. Robbins, attorney for the applicant summarized the traffic engineer's written testimony. Mr. Robbins stated that the nearest Metro station is about 1600 feet away at Union Station, thus making it attractive for employees to utilize the metro system for trips to and from work. He also stated that the proposed building would not create any traffic circulation problems for the area. Based on the written report of the applicants traffic expert and the report of the DOT, the Commission agrees with the comments of Mr. Robbins.

13. Daniel O' Sullivan, President of the Union Labor Life Insurance Company testified that eighty percent of the clerical staff and fifty per cent of the management employees of his company now lives in New York City. The Company does not expect most of the clerical employees to move to the Washington, D.C. area and has thus developed a severance pay plan for employees who do not choose to move. Mr. O' Sullivan also stated that if the company relocates in the District, their overall operation is expected to accelerate both in growth and number of employee's. Thus the company is committed to training and employing District residents to replace those employee's who would remain in New York, should the application be granted. The Commission finds that the application would be beneficial to the District of Columbia in terms of providing a substantial number of new jobs and the benefits associated with additional new employment in the city.

14. The Office of Planning and Development by report dated September 19, 1980, and by testimony presented at the public hearings recommended conditional approval of the application. The Office of Planning and Development believes that the proposed development in this case is consistent with the intent and purpose of:

    a. The amended plan for the Northwest No. 1 Urban Renewal Area;

    b. The proposed amendment of the Zoning Regulations and Maps now pending before the Commission in the Hotel Incentive District Case Nos. 80-3 and 80-4, and;

    c. Article 75 of the Zoning Regulations.

The OPD further noted that if approved this project will provide initial employment for 400 persons and ultimately induce jobs for close to 1,800 persons. As an insurance company headquarters the facility would employ a relatively high proportion of clerical personnel.

These jobs would be of significant benefit to the District of Columbia, both for its residents and for its effect on the tax base of the city.

The OPD also believed that the proposed development will make an important contribution to the revitalization of the east end of downtown. Therefore, OPD recommended approval of the application subject to the following:

a. The design of the building should be modified to comply with the setback above the 90 foot height.

b. The loading berths should be modified to comply with the intent as well as the letter of the Zoning Regulations.

c. The applicants should clarify the amount of retail space to occupy the ground floor so that, among other things, the parking requirements can be established.

d. The need for the proposed 293 parking spaces should be established to the satisfaction of the Department of Transportation and the Zoning Commission.

15. As to recommendations of the OPD, the Commission finds that the arguments presented by the applicant, as set forth in Finding of Fact No. 10, are persuasive, and that the building need not be set back at the ninety foot level. The applicant submitted revised plans for the loading berth area, marked as Exhibit No. 36, showing the location of loading berths to provide on-site maneuvering room and the elimination of one of the berth. The Department of Transportation, report, as set forth in Finding of Fact No. 16, also , found that the number of parking spaces proposed is acceptable.

16. The Department of Transportation, by report dated September 24, 1980 and by testimony presented at the public hearing reported that the planned 293 parking spaces are acceptable based on the need for at least 230 spaces plus visitor parking. The Department also stated that the loading berth design can be improved and suggested that the number of berths could be reduced to three including one for large trucks and two for small trucks. This would make it possible for the small trucks to maneuver within the building and the large trucks, which come to the building less frequently, could back into the building. The Commission concurs with the findings of the D.O.T.

17. At the public meeting held on October 9, 1980, the Commission reviewed several granite and glass samples of different shades and colors. These samples were requested by the Commission at the September 29,1980 public hearing for the purpose of allowing the Commission to have a greater range of color selections in order to provide the most compatible type of building materials for the area. After discussing the question of building facade types and glass, the Commission determined that the final selection of granite and glass would be determined by Chairman Mariani as to shade and degree of the grey color required by the Commission, before issuance of building permits.

18. Charles Richardson, representing Advisory Neighborhood Commission - 2C, by letter dated July 3, 1980 reported that his ANC supported the application as requested. He added however, that the ANC would desire to have the opportunity to participate in an affirmative action program aimed at recruiting and training under priviledged District persons for employment within the applicants operation should the application be granted.

19. Henry Austin, representing the Central City Community Corporation, stated at the public hearing that the Board of Directors of his organization voted to support the application as filed. He also requested that his organization be allowed to participate in any affirmative action program imposed by the Commission.

20. In response to the issues and concerns of ANC-2C and the Central City Community Corporation, the Commission finds that the applicant has testified that he will be required to meet an affirmative action program imposedbythe Redevelopment Land Agency. The RLA has sufficient authority to implement a full affirmative action employment program to recruit and train District residents at various staff levels for employment within the company should the application be granted. There is thus no need for the Zoning Commission to impose any requirement in that regard.

21. The proposed action was referred to the National Capital Planning Commission under the terms of the District of Columbia Self-Government and Governmental Reorganization Act and the National Capital Planning Commission reported that the PUD with the guidelines, standards, and conditions as proposed by the Zoning Commission will not have an adverse impact on the functions of the Federal Establishment or other Federal interests in the National Capital.

CONCLUSIONS OF LAW

1. The proposed Planned Unit Development meets the minimum area requirements of Sub-section 7501.2 of the Zoning Regulations.

2. The Planned Unit Development process is an appropriate means of controlling development of the subject site.

3. Approval of this consolidated PUD application is appropriate, because the application is generally consistent with the present character of the area and because it would encourage stability of the area.

4. The Commission takes notes of the position of Advisory Neighborhood Commission - 2C, and in its decision has accorded to the ANC the "great weight" to which it is entitled.

5. The approval of the application would promote orderly development in conformity with the entirety of the District of Columbia zone plan as embodied in the Zoning Regulations and Map of the District of Columbia.

6. The proposed application can be approved with conditions which would insure that development would not have an adverse effect on the surrounding area.

DECISION

In consideration of the Findings of Fact and the Conclusions of Law herein, the Commission hereby Orders approval of the Consolidated Planned Unit Development for Square 563, subject to the following guidelines, conditions, and standards:

1. The Planned Unit Development shall be developed under the existing C-3-C District. There shall be no change of zoning for the planned unit development.

2. The Planned Unit Development shall be developed in accordance with the revised plans filed with the Zoning Commission, dated July 30, 1980 prepared by Vlastimil Koubek, and marked as Exhibit No. 21 of the record, as modified by plans marked as Exhibits 35 and 36 of the record, except as those plans may be modified to conform to the guidelines, conditions and standards of this order.

3. The overall floor area ratio of the building shall not exceed 6.5.

4. The maximum height of the building shall not exceed 101 feet. The roof structure of the building, including mechanical equipment and stair and elevator penthouses, may exceed the height limitation, but shall not exceed 18 feet 6 inches in height above the level of the roof upon which it is located.

5. The uses of the building shall be limited to office and residential uses, and uses accessory thereto, provided that the ground floor and first cellar may be occupied by retail and service uses permitted in the C-3-C District.

6. Any signs on the building shall be located flush with or behind the principal facades of the building and the top of the sign shall be no higher than the structural slab of the second floor. Any lighted signs shall be stencil cut and back lit. The corporate logo of the Union Labor Life Insurance Company may be located on the exterior of the building anywhere below the level of the principal roof of the building.

7. The design and location of exterior spaces, paving material, provision for seating, planters, trees and shrubbery shall be as shown on Exhibit No. 35 of the record. All improvements provided by the applicant and located in public space shall be maintained by the applicant. The species of trees to be located on the public space shall be as shown on the plan approved by the Department of Transportation, marked as Exhibit No. 35 of the record.

8. Storm water management and erosion control measures shall be provided as shown on the approved plans.

9. Off street parking shall be provided for a minimum of 230 spaces and a maximum of 293 spaces and shall be located within the cellars of the building and vault space.

10. Off-street loading berths shall be provided within the building, with two berths measuring 12 feet by 25 feet and one berth measuring 12 feet by 55 feet. The berths shall be designed so as to provide for maneuvering of the smaller trucks within the building as shown on Exhibit No. 36, subject to final resolution of the details of the loading area between the applicant and the D.C. Department of Transportation.

11. The exterior of the building shall be polished dark grey granite, as dark as possible, with grey tinted glass to match the granite as closely as possible. Prior to the issuance of a building permit for the project, the applicant shall have received the approval of the Chairman of the Zoning Commission as to the specific stone and glass to be used in the facade.

12. Building permits for the construction of this project shall be issued only to the owner of the property, the D.C. Redevelopment Land Agency, and the present contract purchaser, the Union Labor Life Insurance Company.

13. No building permit shall be issued for this planned unit development until the applicant has recorded a covenant in the land records of the District of Columbia, between the owner and the District of Columbia, and satisfactory to the office of the Corporation Counsel and the Zoning Regulations Division, which covenant shall bind the applicant and all successors in title to construct on and use this property in accordance with this Order or amendments thereof by the Zoning Commission.

Vote of the Commission taken at the public meeting of October 9, 1980: 3-0 (Commissioners Theodore F. Mariani, Walter B. Lewis, and John G. Parsons to APPROVE with CONDITIONS; Commissioner Ruby B. McZier not voting, not having heard the case and Commissioner George M. White not present not voting).

THEODORE F. MARIANI
Chairman
Zoning Commission

STEVEN E. SHER
Executive Director
Zoning Secretariat

This order was adopted by the Zoning Commission at its public meeting held on November 13, 1980 by a vote of 4-0(Walter B. Lewis, John G. Parsons, Theodore F. Mariani and George M. White to adopt, Ruby B. McZier not voting, not having heard the case)

In accordance with Section 4.5e of the Rules of Practice and Procedure before the Zoning Commission of the District of Columbia, this order is final and effective on _____.

EXHIBIT D

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Zoning Commission

ZONING COMMISSION FOR THE DISTRICT OF COLUMBIA
ZONING COMMISSION ORDER NO. 80-07D
Z.C. Case No. 80-07D
Georgetown University
(Modification of Consequence for a Planned Unit Development @ Square 563, Lot 16 (111 Massachusetts Avenue, N.W.))
October 14, 2021

Pursuant to notice, at its October 14, 2021 public meeting, the Zoning Commission for the District of Columbia ("Commission") considered the application ("Application") of Georgetown University ("University") on behalf of Jemal's Darth Vader L.L.C. ("Owner") for a Modification of Consequence to revise Condition No. 5 of Z.C. Order No. 324 ("Original Order") and Condition No. 2 of Z.C. Order No. 80-07A ("Expansion Order") for Lot 16 in Square 563, with a street address of 111 Massachusetts Avenue, N.W. ("Property").[1] The Commission reviewed the Application pursuant to the Commission's Rules of Practice and Procedures, which are codified in Subtitle Z of Title 11 of the District of Columbia Municipal Regulations (Zoning Regulations of 2016, the "Zoning 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 the Original Order, the Commission approved a Planned Unit Development ("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 the Expansion Order, 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 District to the C-4 Zone District. The Expansion Order approved office and retail use of the Property.

3. Pursuant to Z.C. Order No. 80-07B, the Commission approved a modification of consequence to the design approved in the Expansion Order.

[1] The Application also requested a waiver of the hearing requirement in the event that the Commission elected to consider the Application as a modification of significance. For the reasons discussed in this Order, the Commission considered the Application as a modification of consequence and, accordingly, did not consider the waiver.

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EXHIBIT NO.9

4. Pursuant to Z.C. Order No. 80-07C, the Commission approved a two-year time extension for the filing of a building permit to vest the Expansion Order.

5. Pursuant to Z.C. Order No. 08-06A, the Property's underlying C-3-C zone was re-designated as the D-4 zone, and the C-4 zone was re-designated as the D-6 zone.

PARTIES AND NOTICE

6. The only parties to the earlier orders were Advisory Neighborhood Commissions ("ANC") 6C and 6E, the "affected" ANCs pursuant to Subtitle Z § 101.8.

7. The University served the Application on August 5, 2021 on ANC 6C and 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. (Exhibit ["Ex."] 2.)

THE APPLICATION

8. On August 5, 2021, the University filed the Application requesting a Modification of Consequence to authorize university use of the Building under both the Original Order and the Expansion Order. The University explained that it was finalizing a contract to acquire the Property and sought to use the Building for a mix of academic and administrative uses. While administrative office space is permitted under the existing PUD orders, other planned uses, such as classrooms and student meeting spaces, are considered "university use" and are not specifically authorized under the PUD. (Ex. 2.)

9. The University explained it had not yet decided whether to pursue the approved expansion but desired to add university use to the authorized list of uses under the Expansion Order and confirm such use would be permitted, should the University elect to pursue the expansion. (Ex. 2.)

10. The University explained that the Property is located immediately north of the Georgetown University Law Center. The acquisition of the Property would, combined with other recent developments, give the University exclusive control over a four-block stretch between H Street and E Street that would define the University's downtown "Capitol Campus." The University noted that university use is permitted by right in the high-density commercial zones that apply to the Property and the PUD.

RESPONSES TO THE APPLICATION

OP Report

11. OP submitted a report dated August 30, 2021 ("OP Report") recommending approval of the Application: (Ex. 4.)

- OP observed that the high-density commercial zones applicable to the PUD all permit university use, and nothing in the prior PUD orders evidenced an intent to specifically exclude the possibility of university use;

- OP found that university use would benefit the surrounding area through increased pedestrian activity, particularly within the context of a stalled office market; and

- OP concluded that university use would not be inconsistent with either of the approved PUD orders or with the Comprehensive Plan.

12. OP did not object to consideration of the Application as a Modification of Consequence.

13. OP requested that the University clarify whether parking relief was needed for the proposed university use. By letter dated October 7, 2021 (Ex. 7.), the University confirmed that parking relief was not needed for the reasons set forth on page 2 and in footnote 1 on page 5 of the OP Report:

    - Under Subtitle A § 102.4, the Application is considered under the 2016 Zoning Regulations, pursuant to which the existing PUD is located in the D-4 zone and the approved expansion would be located in the D-6 zone, which are the analogues to the C-3-C and C-4 Zone Districts under the 1958 Zoning Regulations for this Property; and

    - Under the 2016 Zoning Regulations, no parking is required in the D zones, and so accordingly no parking is required for a change of use at the Property. Notwithstanding the foregoing, the University must continue to maintain any existing parking required by the conditions in the Original Order and Expansion Order, as set forth in Subtitle A § 102.5.

<u>ANC Reports</u>

14. ANC 6E submitted a written report stating that at its September 7, 2021 duly noticed public meeting, at which a quorum was present, ANC 6E voted 7-0-0 to support the Application because the university use would help activate the sidewalks and streets surrounding the Property. (Ex. 5.)

15. ANC 6C submitted a written report stating that at its September 9, 2021 duly noticed public meeting, at which a quorum was present, ANC 6C voted 6-0-0 to support the Application because the university use would be a beneficial long-term use and would not result in any detrimental impacts or conflict with the other conditions of the PUD. (Ex. 6.)

CONCLUSIONS OF LAW

1. Subtitle Z § 703.1 authorizes the Commission, in the interest of efficiency, to make Modifications of Consequence to final orders and plans without a public hearing.

2. Subtitle Z § 703.3 defines a Modification of Consequence as "a modification to a contested case order or the approved plans that is neither a minor modification nor a modification of significance."

3. Subtitle Z § 703.4 includes "a proposed change to a condition in the final order" as an example of a Modification of Consequence.

4. The Commission concludes that the University satisfied the requirement of Subtitle Z § 703.13 to serve the Application on all parties to the original proceeding, in this case ANC 6C and ANC 6E.

5. The Commission concludes that the Application qualifies as a Modification of Consequence within the meaning of Subtitle Z §§ 703.3 and 703.4, as a request to modify the conditions approved by the Original Order and as a request to authorize a proposed use that is otherwise permitted in the high-density commercial zones that apply to the PUD, and therefore the modification can be granted without a public hearing pursuant to Subtitle Z § 703.17(c)(2).

6. The Commission concludes that because ANC 6C and ANC 6E filed a response in support of the Application prior to the Commission's initial consideration of the Application, the requirement of Subtitle Z § 703.17(c)(2) to provide a timeframe for responses by all parties had been met, and therefore the Commission could consider the merits of the Application at its October 14, 2021 public meeting.

7. The Commission finds that the Application is consistent with the PUD as approved by the Original Order and the Expansion Order, because the proposed university use is permitted by right in the underlying high-density commercial zones applicable to the PUD and will further goals to activate the surrounding neighborhood.

"GREAT WEIGHT" TO THE RECOMMENDATIONS OF OP

8. The Commission is required to give "great weight" to the recommendations 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).)

9. The Commission notes OP's lack of objection to the Application being considered as a Modification of Consequence and finds OP's recommendation to approve the Application persuasive and concurs in that judgment.

"GREAT WEIGHT" TO THE WRITTEN REPORTS OF THE ANCS

10. 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 (D.C. 1978).)

11. The Commission finds ANC 6C's and ANC 6E's recommendations to approve the Application persuasive and concurs in that judgment.

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 of Consequence to modify Condition No. 5 of Z.C. Order No. 324 as follows (additions in **bold** and **underlined** text):

> 5. The uses of the building shall be limited to office**, university,** and residential uses, and uses accessory thereto, provided that the ground floor and first cellar may be occupied by retail and service uses permitted in the C-3-C District.

In addition, Condition No. 2 of Z.C. Order No. 80-07A is modified as follows (additions in **bold** and **underlined** text):

> 2. The Project shall be an office **and/or university** building measuring approximately 130 feet in height, with a building density of not more than 9.2 FAR. . . .

All other conditions of Z.C. Order No. 324 and Z.C. Order No. 80-07A remain unchanged and in effect.

VOTE (October 14, 2021): 4-0-1 (upon the motion of Robert E. Miller, as seconded by Peter A. Shapiro; Robert E. Miller, Peter A. Shapiro, Anthony J. Hood, and Peter G. May to **APPROVE;** representative of the Architect of the Capitol vacant and not voting).

In accordance with the provisions of Subtitle Z § 604.9, this Order shall become final and effective upon publication in the *D.C. Register*; that is, on January 7, 2022.

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.

EXHIBIT E

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Zoning Commission

ZONING COMMISSION FOR THE DISTRICT OF COLUMBIA
ZONING COMMISSION ORDER NO. 80-07E
Z.C. Case No. 80-07E
Georgetown University
(Modification of Consequence for a Planned Unit Development @ Square 563, Lot 16 [111 Massachusetts Avenue, N.W.])
November 30, 2023

Pursuant to notice, at its November 30, 2023 public meeting, the Zoning Commission for the District of Columbia ("Commission") considered the application ("Application") of Georgetown University ("Applicant" or "University") for a Modification of Consequence to the design of the approved Planned Unit Development ("PUD") for Lot 16 in Square 563, with a street address of 111 Massachusetts Avenue, N.W. ("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.

2. 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 ("Proposed Expansion").

3. Pursuant to Z.C. Order No. 80-07B, the Commission approved a modification of consequence to the Proposed Expansion.

4. Pursuant to Z.C. Order No. 80-07C, the Commission approved a two-year time extension for the filing of a building permit to vest the Proposed Expansion.

5. Pursuant to Z.C. Order No. 80-07A(1), an administrative COVID-19 One-Year Time Extension was granted, pursuant to Subtitle Z § 705.9, which extended the Applicant's time to commence construction on the Proposed Expansion from May 12, 2022 to May 12, 2023.

ZONING COMMISSION
District of Columbia
CASE NO.80-07E
EXHIBIT NO.11

6. Pursuant to Z.C. Order No. 08-06A, the Property's underlying C-3-C zone was re-designated as the D-4 zone.

7. Pursuant to Z.C. Order No. 80-07D, the Commission approved the addition of university use as a permitted use of the PUD.

8. As explained by the University in its Application, construction of the Proposed Expansion was not pursued. (Ex. 3, p. 2n1.) Accordingly, pursuant to Subtitle Z § 702.6, both Z.C. Order No. 80-07A and 80-07B have expired, and the Property remains subject to Z.C. Order No. 324 as modified by Z.C. Order No. 80-07D.

PARTIES AND NOTICE

9. The following were automatically parties to this proceeding pursuant to Subtitle Z § 403.5:
   - The University; and
   - Advisory Neighborhood Commission ("ANC") 6E.

10. The University served the Application on October 2, 2023, 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. (Exhibit ["Ex."] 3.)

11. Advisory Neighborhood Commissions ("ANC") 6C was a party to Z.C. Order No. 80-07D but is now no longer an affected ANC pursuant to Subtitle Z, Section 101.8 due to redistricting that took place effective January 1, 2023. The University requested a waiver from service requirements pursuant to Subtitle Z § 101.9, arguing that ANC 6C had shifted 2-3 blocks east of the site and so there was good cause to no longer serve ANC 6C, particularly as pending language in Z.C. Case No. 22-25 would remove the requirement to serve an ANC that is no longer an "affected ANC." After the Commission denied the waiver at its October 26, 2023 public meeting, the University served a copy of the Application on ANC 6C, as stated in the University's letter dated October 30, 2023. (Ex. 8.)

THE APPLICATION

12. On October 2, 2023, the University filed the Application requesting a Modification of Consequence to modify the design of the PUD in order to facilitate a full-scale renovation of the existing building ("Project"). The University explained that the PUD would remain within the 6.5 FAR maximum for nonresidential use in the D-4 Zone but the renovations would trigger Green Area Ratio ("GAR") and achieve a minimum GAR of 0.2. The University also explained that the Project would incorporate short-term and long-term bicycle parking in compliance with the Regulations, reduce the amount of vehicular parking, and reconfigure the loading dock to comply with the Regulations. (Ex. 3.)

13. Plans submitted with the Application showed alterations to the ground level of the PUD that pulled the streetwall out to the property line to enable new building entrances and improved retail space, new windows, an updated roof plan that would include green roof,

and a proposed site plan that included conceptual drawings for improvements to the public realm surrounding the Property. (Ex. 3; 3E1-3E2.)

14. The University requested design flexibility be incorporated as a part of the approval, as such flexibility is common for contemporary Commission approvals. (Ex. 3F.)

15. On October 15, 2023, the University submitted an updated site plan reflecting revisions made in response to feedback from OP and DDOT and a Loading Management Plan requested by DDOT to mitigate the impact of continued "back-in" loading maneuvers. (Ex. 5; 5A; 5B.)

RESPONSES TO THE APPLICATION

16. OP submitted a report October 16, 2023 ("OP Report") recommending approval of the Application. (Ex. 6.) OP concluded that the Application could appropriately be considered as a modification of consequence because the requested changes were modest and would improve the relationship of the building to the surrounding streetscape. OP averred that the modifications would not render the PUD less consistent with the Comprehensive Plan but rather would further policies related to land use and transportation. OP also stated that the modifications would improve the building character and would be consistent with the Commission's approval of university use in Z.C. Case No. 80-07D. OP did not object to the design flexibility and noted it was substantively consistent with pending flexibility language in Z.C. Case No. 22-25.

17. By report dated October 17, 2023, and pursuant to vote taken at a regularly-scheduled and duly-noted public meeting, with a quorum present, ANC 6E supported the proposed Application. (Ex. 7.)

18. By letter dated October 30, 2023, the University submitted email correspondence from the chair of ANC 6C stating that ANC 6C would not be taking up the Application because the Property was now well outside the ANC's new boundaries. (Ex. 8A.)

CONCLUSIONS OF LAW

1. Subtitle Z § 703.1 authorizes the Commission, in the interest of efficiency, to make Modifications of Consequence to final orders and plans without a public hearing.

2. Subtitle Z § 703.3 defines a Modification of Consequence as "a modification to a contested case order or the approved plans that is neither a minor modification nor a modification of significance."

3. Subtitle Z § 703.4 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 of Consequence.

4. The Commission concludes that the University satisfied the requirement of Subtitle Z § 703.13 to serve the Application on all parties to the original proceeding, in this case ANC 6E and ANC 6C.

5. The Commission concludes that the Application qualifies as a Modification of Consequence within the meaning of Subtitle Z §§ 703.3 and 703.4, 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 by Z.C. Order No. 324 and Z.C. Order No. 80-07D because the modifications will facilitate the adaptive reuse of the office building for university use and will further goals to activate 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 § 405.8. (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 also finds that ANC 6C affirmatively chose not to consider the Application.

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 of Consequence and authorizes the construction of the improvements as shown on the Final Plans (defined below) subject to the following conditions:

1. 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.) (the "Final Plans") subject to the following areas of design flexibility:

    a. To vary the location and design of all interior components, including partitions, structural slabs, doors, hallways, columns, stairways, mechanical rooms, and toilet rooms, provided that the variations do not change the exterior configuration or appearance of the structure;

    b. To vary the colors of the exterior materials based on availability at the time of construction, provided such colors are within the color ranges proposed in the Final Plans;

    c. To make minor refinements to the locations and dimensions of exterior details that do not substantially alter the exterior design shown on the Final Plans. Examples of exterior details would include, but are not limited to, doorways, canopies, railings, and skylights;

    d. To make refinements to the approved parking configuration, including layout and number of parking spaces plus or minus 10%;

    e. To vary the location, attributes, and general design of the streetscape, subject to approval by public space officials;

    f. To vary the amount, location and type of green roof and paved areas to meet stormwater requirements and sustainability goals or otherwise satisfy permitting requirements, so long as the Project achieves a minimum GAR of 0.2; and

    g. To make minor refinements to vary the final design of the ground floor storefront features to accommodate the needs of its specific tenants and users, provided that storefront and building identification signage complies with District of Columbia signage regulations.

2. **For the life of the Project**, the University shall adhere to the Loading Management Plan submitted on October 15, 2023 as Exhibit 5B of the Record.

The Final Plans shall supersede the plans approved by the Commission in Z.C. Order No. 324 and, in the event of a conflict between the Final Plans and the plans or associated conditions approved

in Z.C Order No. 324, the Final Plans shall govern. All other conditions of Z.C. Order No. 324, as modified by Z.C. Order No. 80-07D, remain unchanged and in effect.

FINAL ACTION

VOTE (November 30, 2023) **4-0-1**: (Anthony J. Hood, Robert E. Miller, Joseph S. Imamura, and Tammy M. Stidham to **APPROVE**; 3rd Mayoral Appointee seat vacant).

In accordance with the provisions of Subtitle Z, Section 604.9, this Order No. 80-07E shall become final and effective upon publication in the *District of Columbia Register*; that is, on January 19, 2024.

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.

EXHIBIT F

GEORGETOWN UNIVERSITY

111 Massachusetts Ave NW Zoning Signage Submittal

Capitol Campus
Wayfinding and Identity

August 20, 2025

Perkins&Will

Contents

Zoning Signage Submittal

01 —— Sign Location Plan

02 —— Elevations

Capitol Campus Signage Context

01 —— Sign Location Plan

02 —— Elevations

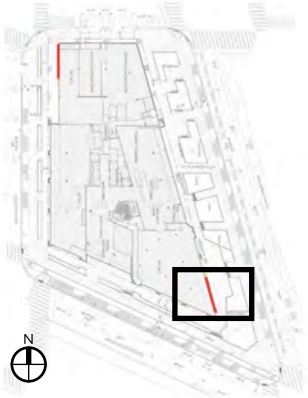
Appendix

Upper Story Building Identification Signage Plan

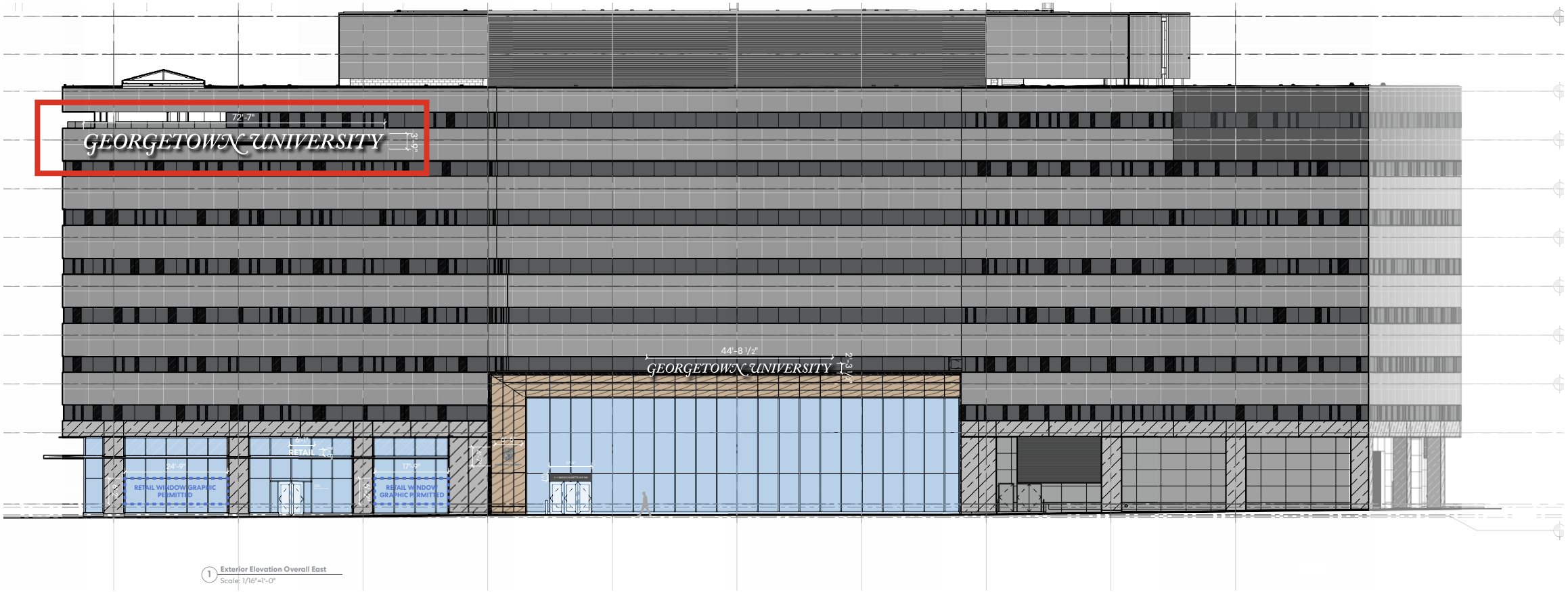
Location of Proposed Upper Story Building Identification Signage

East Elevation - New Jersey Ave Entrance

Proposed Upper Story Building Identification Signage

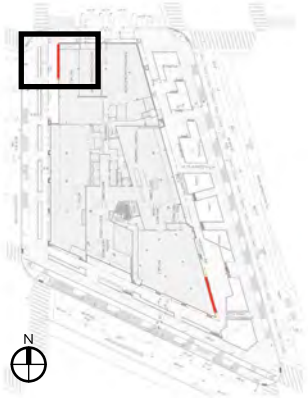


University Building Sign: White, Internal Illumination, Raceway Mounted

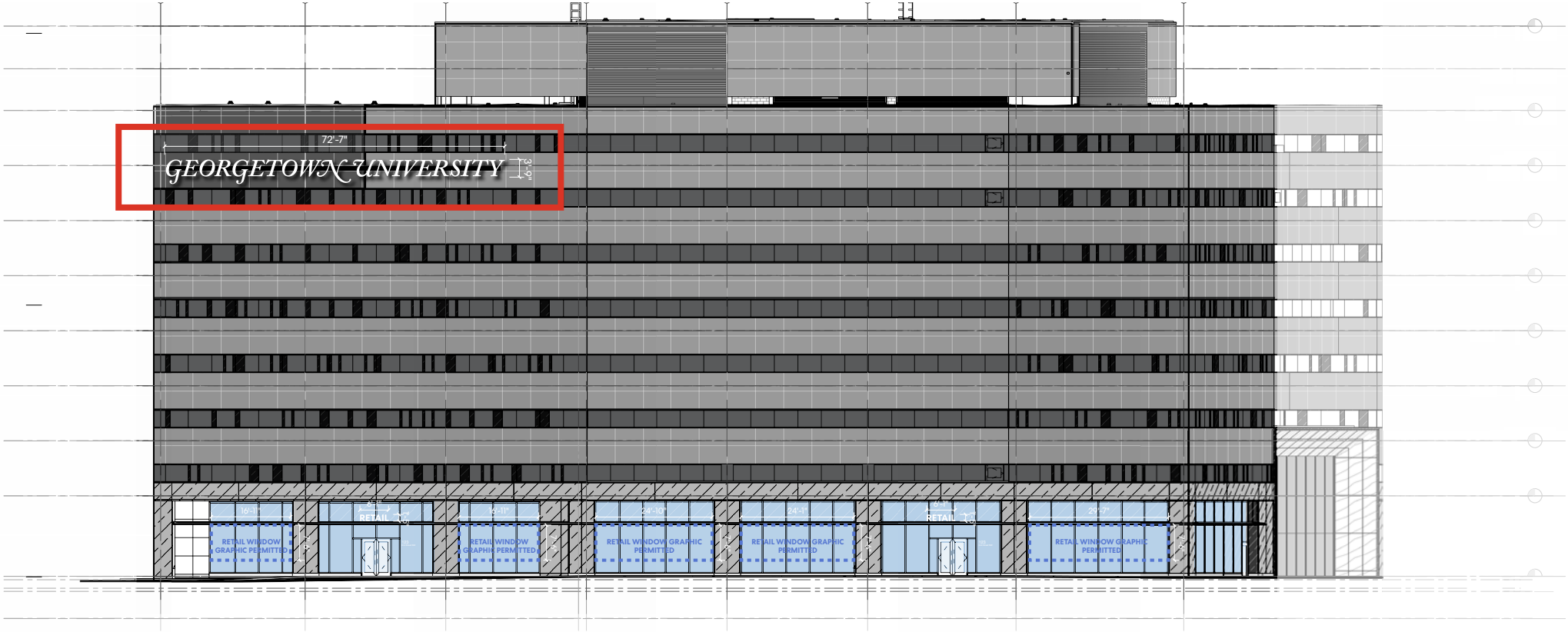


West Elevation - 2nd Street NW

Proposed Upper Story Building Identification Signage



University Building Sign: White, Internal Illumination, Raceway Mounted



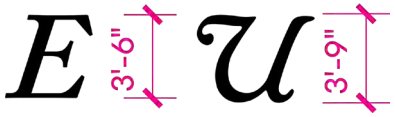
3 Exterior Elevation Overall West
Scale: 1/16"=1'-0"

University Building Sign Detail

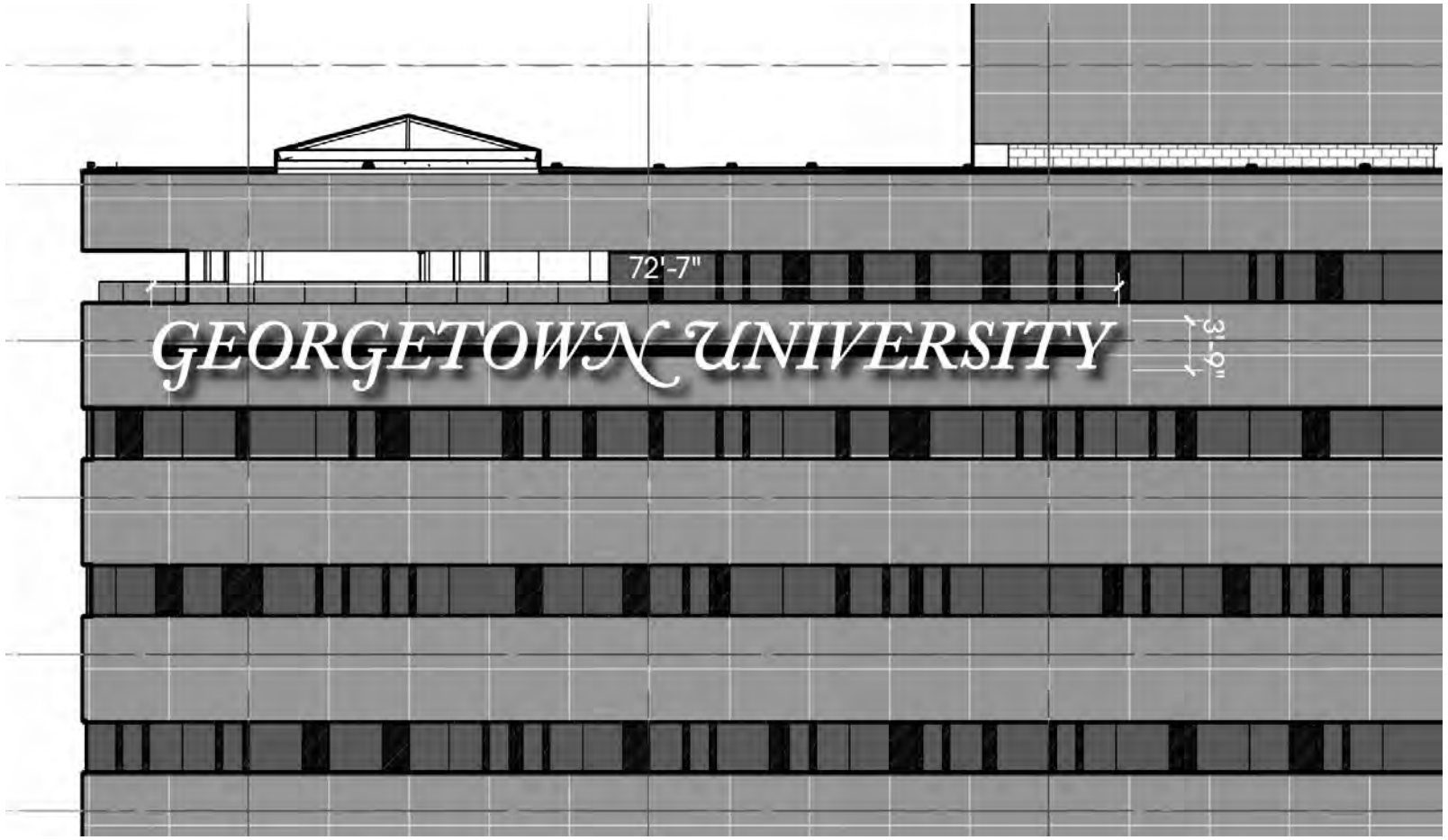
Dimensions, Illumination, and Mounting

Sign is identical on both east and west elevations.

Typical Characters range from 3'-6" to 3'-9" (17 total)



Exceptional Characters with extended serifs do not exceed 5'-2 ½" (3 total)

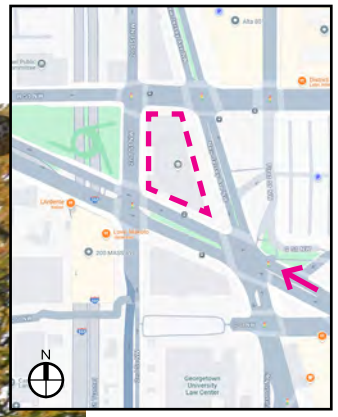


Internally lit

Raceway Mounted

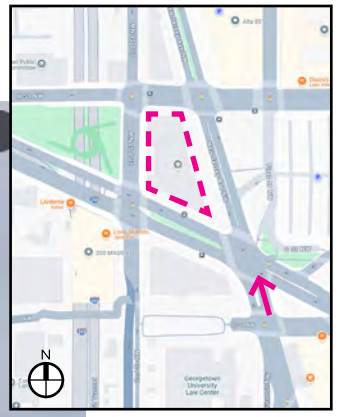
Content and Font are Representative

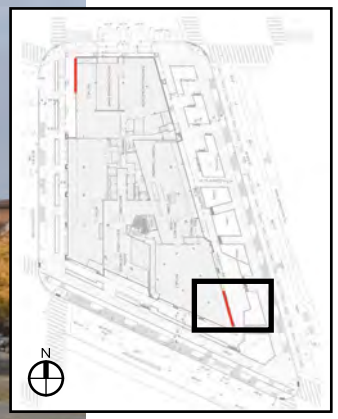
Southeast Approach from Mass Ave NW



Proposed Upper Story Building Identification Signage

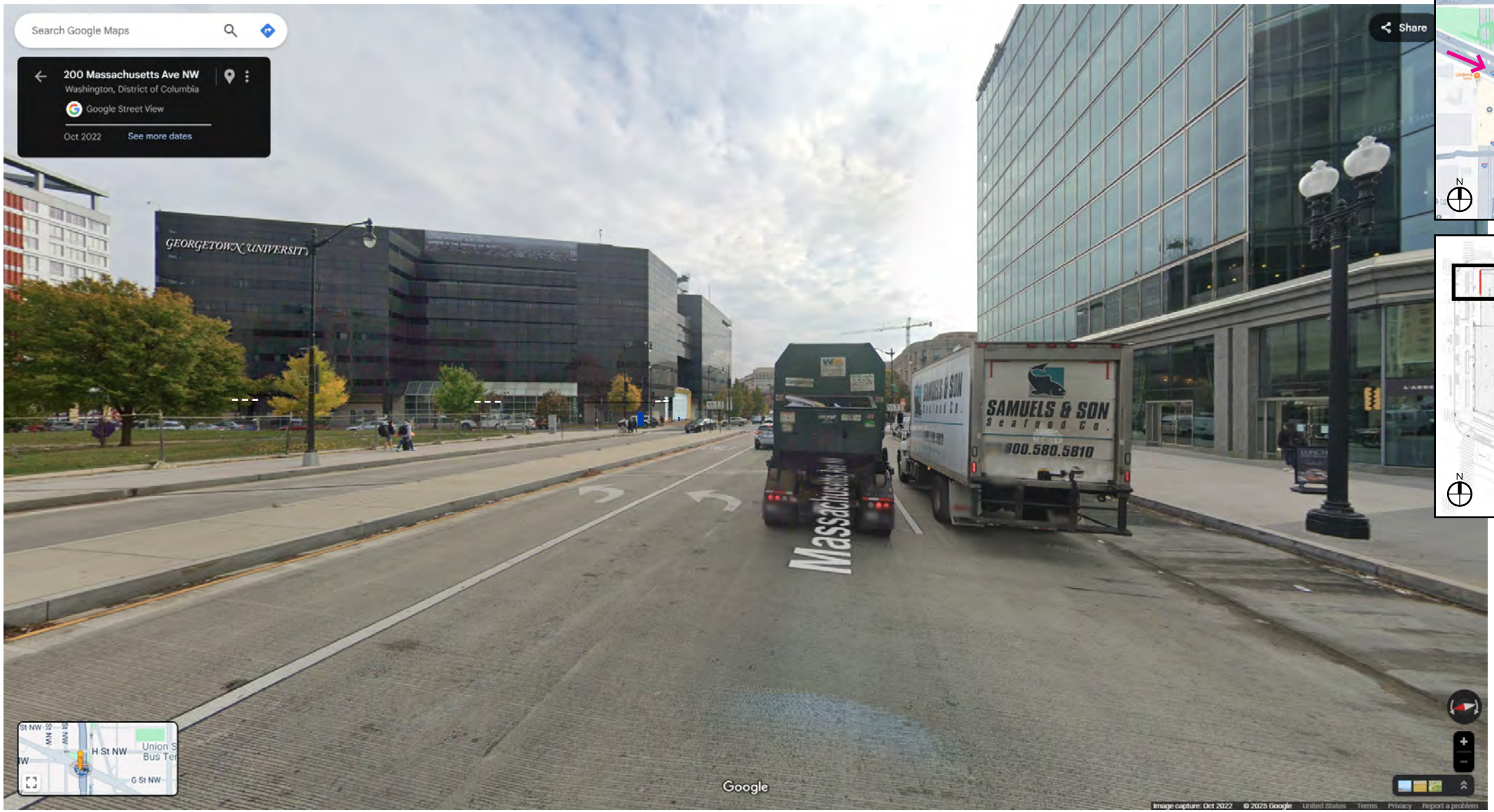
Southeast Approach from New Jersey Ave NW

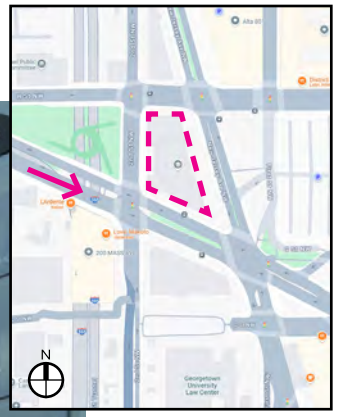


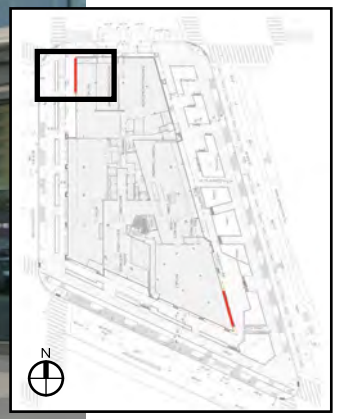


Proposed Upper Story Building Identification Signage

Southwest Approach from Mass Ave NW

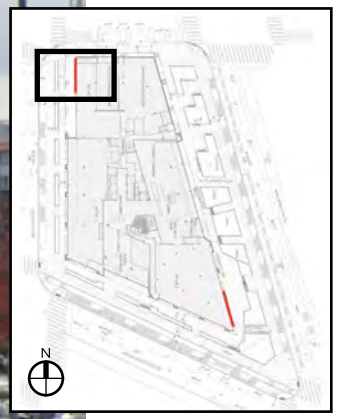






Proposed Upper Story Building Identification Signage

West from 3rd St NW - view from Cobb Park



Proposed Upper Story Building Identification Signage

CAPITOL CAMPUS SIGNAGE CONTEXT

Sign Location Plan

Comprehensive Building Signage Plan

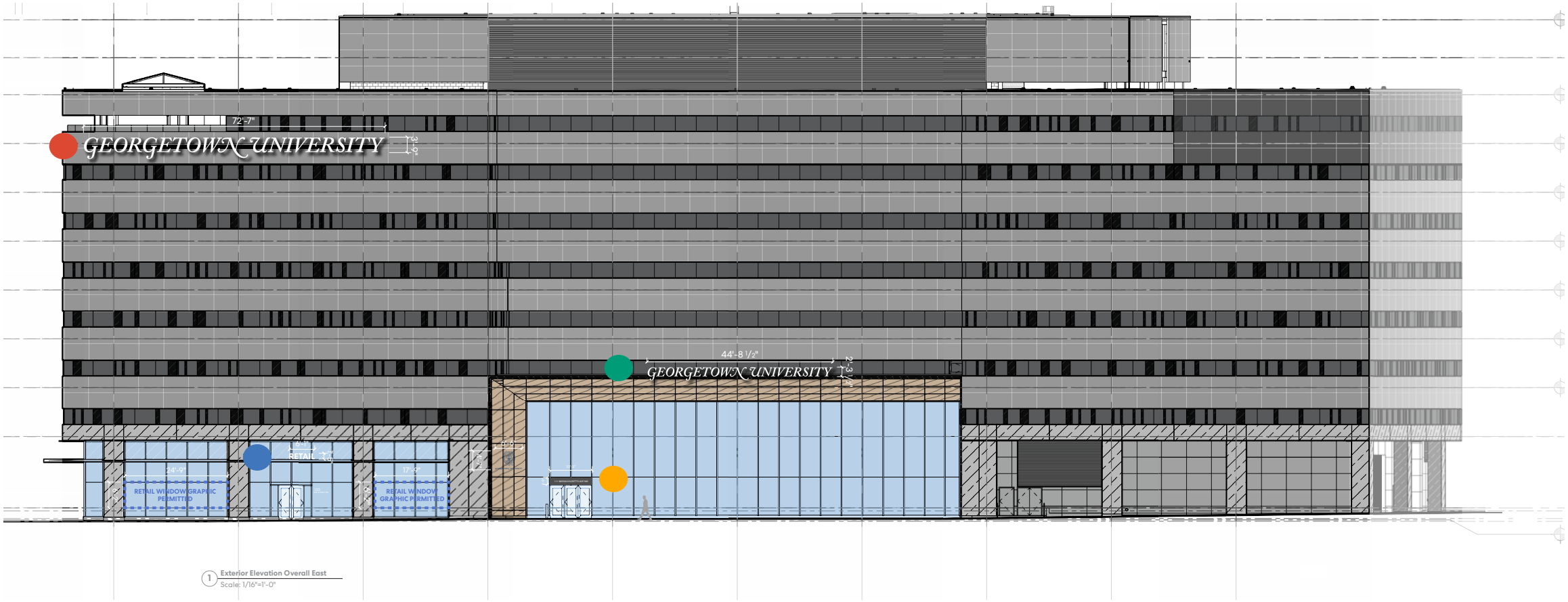
CAPITOL CAMPUS SIGNAGE CONTEXT

Elevations

East Elevation - New Jersey Ave Entrance

University Sign: White, Internal Illumination, Raceway Mounted **University**
Portal Sign: White, Internal Illumination, Perched
Building Address: Flush Mounted Panel
Retail: White, Internal Illumination, Perched + Transparent Window Vinyl

- Proposed Upper Story Building Identification Signage
- Portal Sign, previously authorized by Zoning Commission
- Retail Sign, previously authorized by Zoning Commission
- Building Address, previously authorized by Zoning Commission



East Elevation - New Jersey Ave Entrance

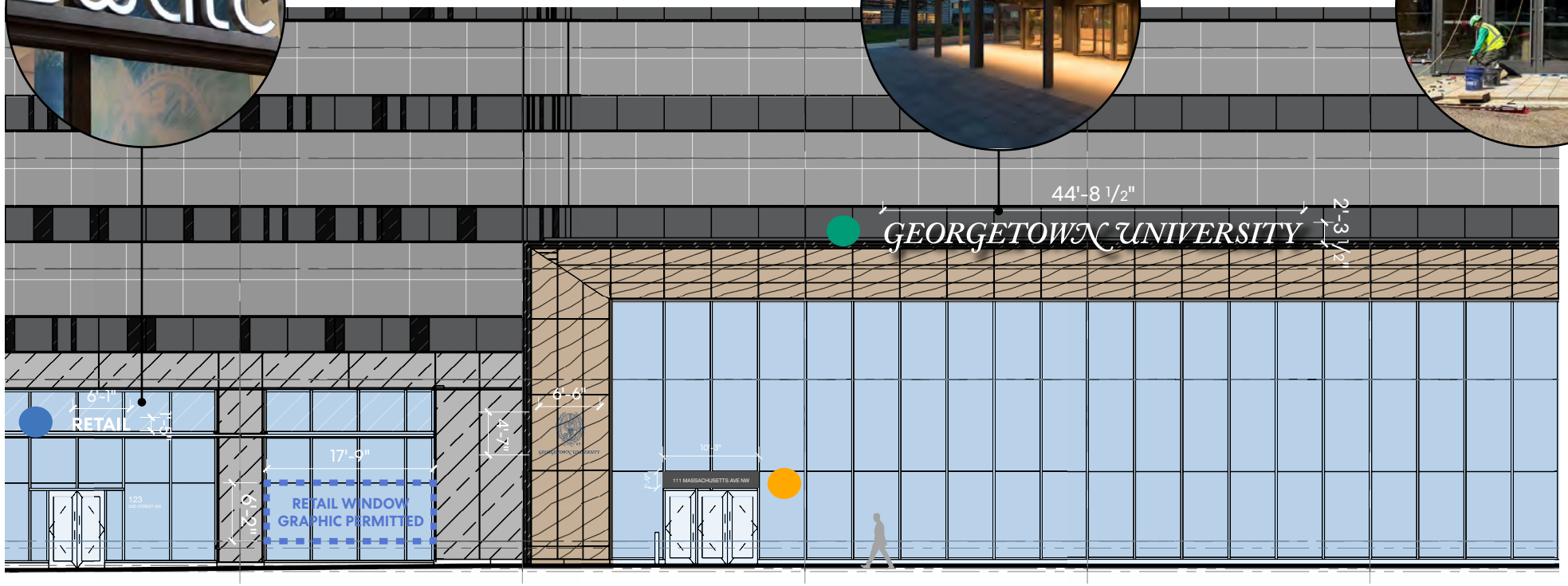
Entrance Close up

- Portal Sign, previously authorized by Zoning Commission
- Retail Sign, previously authorized by Zoning Commission
- Building Address, previously authorized by Zoning Commission

Building Address
White painted letters flush mounted against metal panel painted to match dark mullions.

Retail Sign

Portal Sign



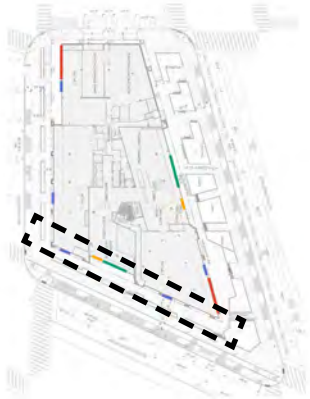
South Elevation - Mass Ave Entrance

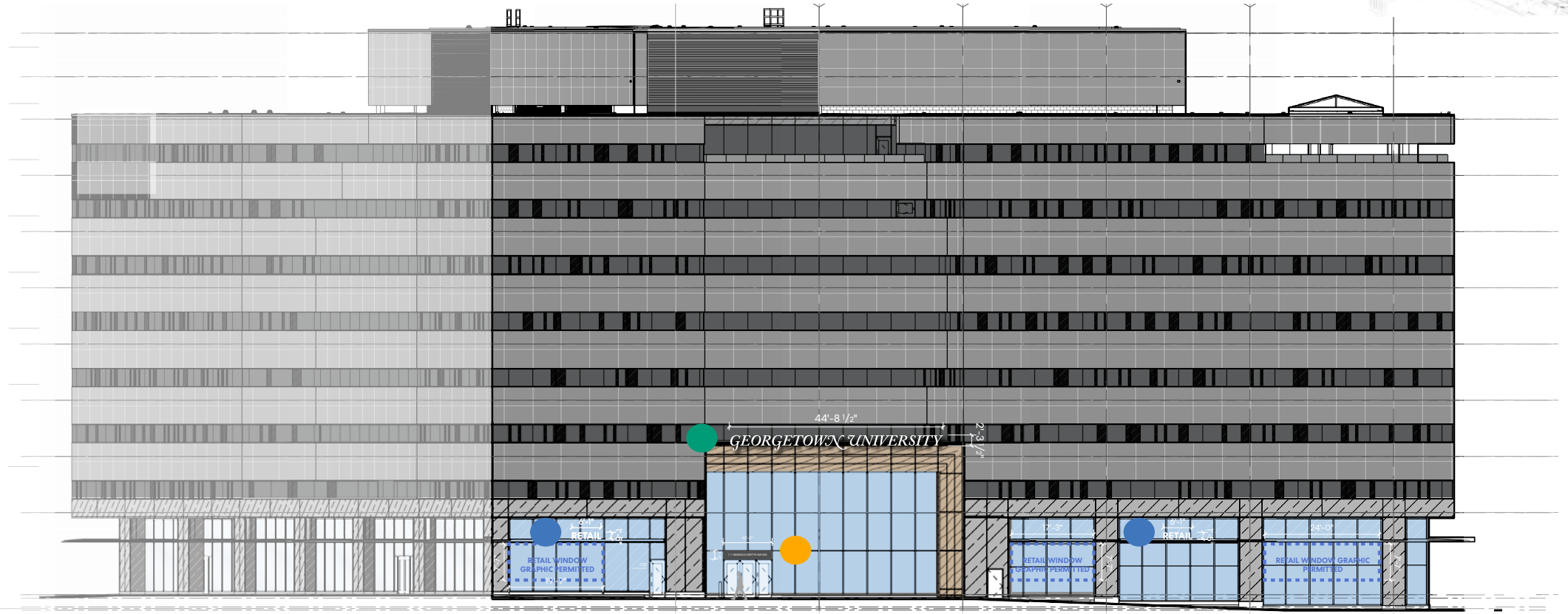
Portal Sign: White, Internal Illumination, Perched
Building Address: Flush Mounted Panel
Retail Sign: White, Internal Illumination, Perched + Transparent Window Vinyl

Portal Sign, previously authorized by Zoning Commission

Retail Sign, previously authorized by Zoning Commission

Building Address, previously authorized by Zoning Commission





4 Exterior Elevation Overall South
Scale: 1/16"=1'-0"

South Elevation - Mass Ave Entrance

Entrance Close up

Portal Sign, previously authorized by Zoning Commission

Retail Sign, previously authorized by Zoning Commission

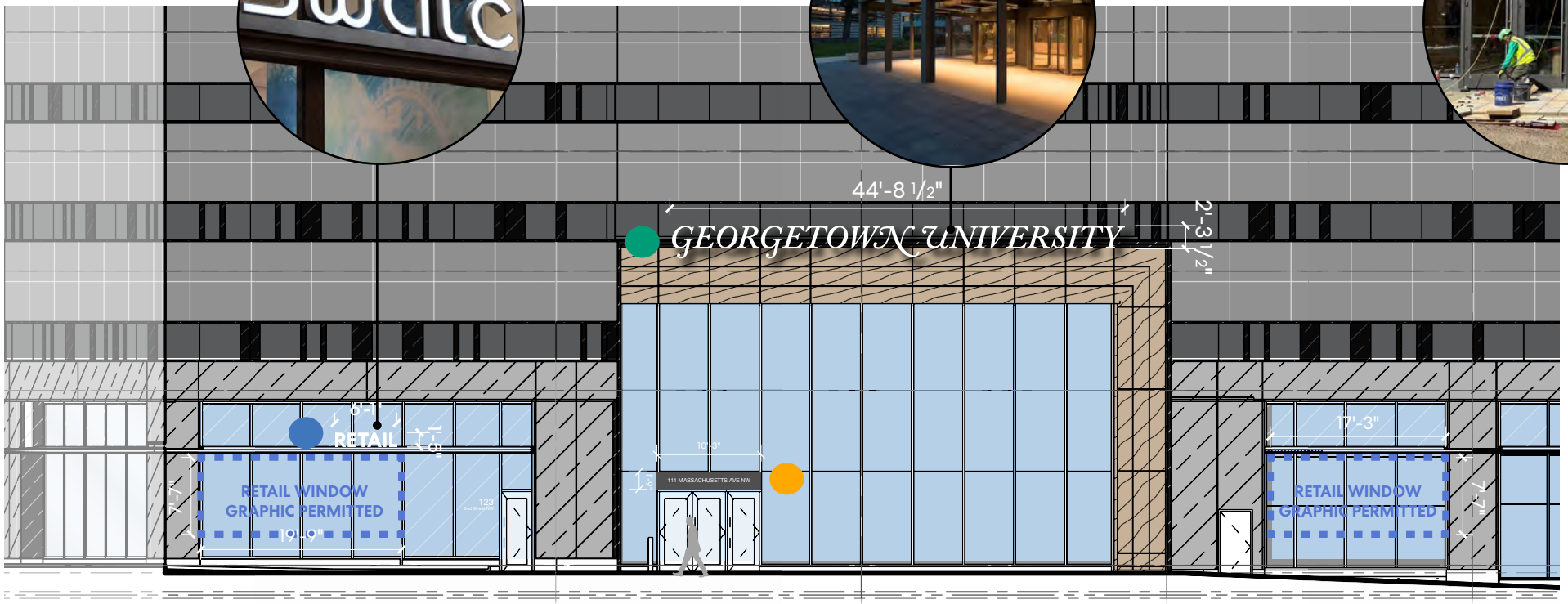
Building Address, previously authorized by Zoning Commission

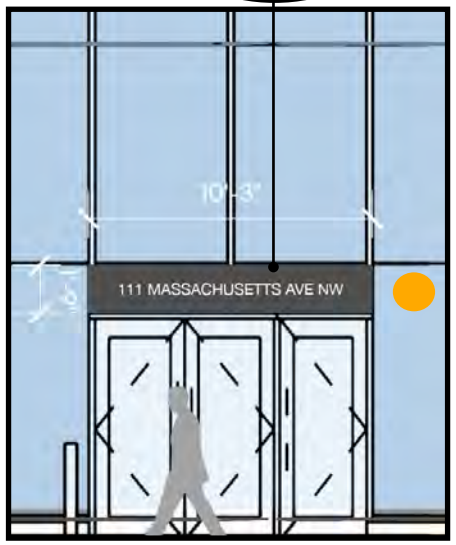
Building Address

White painted letters flush mounted against metal panel painted to match dark mullions.

Retail Sign

Portal Sign



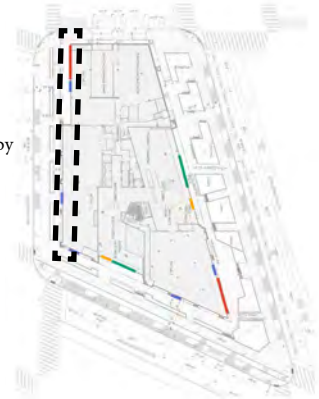


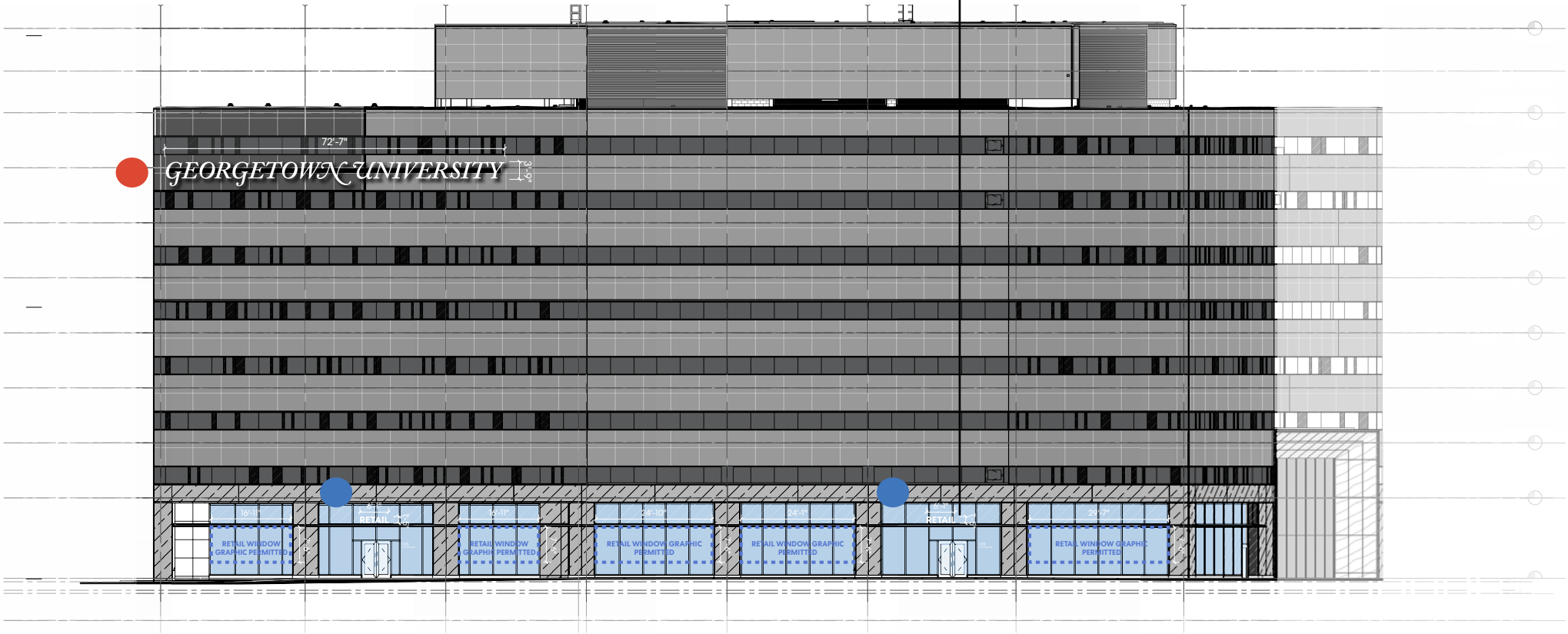
West Elevation - 2nd Street NW

University Building Sign: White, Internal Illumination, Raceway Mounted
Retail Sign: White, Internal Illumination, Perched + Transparent Window Vinyl

Proposed Upper Story Building Identification Signage

Retail Sign, previously authorized by Zoning Commission





3 Exterior Elevation Overall West
Scale: 1/16"=1'-0"

West Elevation - 2nd Street NW

Retail Sign Close up

APPENDIX

Excerpts of Relevant D.C. Sign Code

N101.3.5 – Exemptions from Permit

N101.3.5.3 Signs Within a Building
Any sign located entirely inside a building, unless the sign is attached directly or painted on a window; is located within 18 inches (457 mm) of a window or entrance; or contains writing that is legible, or an image that is clearly discernible, from property other than the property on which the sign is located. A sign inside a building that is attached directly or painted on a window; is located within 18 inches (457 mm) of a window or entrance; or contains writing that is legible, or an image that is clearly discernible, from property other than the property on which the sign is located shall require a permit and shall be regulated as a sign under this appendix.

N101.3.5.4 Signs on Windows
Signs upon a show window, or upon any other window abutting on, or overlooking a street or public way, within the Commercial and PDR Districts as fixed by the Zoning Regulations, which signs advertise only the name of the occupant of the building, office, or store, the business conducted or products sold therein, when the aggregate area of those signs does not exceed 20 percent of the area of the window upon which they are displayed.

N101-6 – Character of Advertising

N101.6.6 Special Permits
The code official is authorized to issue a permit to erect and maintain a sign not conforming with this section if the code official finds that such sign or conditions surrounding such sign are unusual in character, of a type infrequently encountered, and that approval of the permit will provide an equitable application of this section basically in keeping with its purpose and intent. The code official in each such special permit is authorized to impose such terms and conditions as he or she may deem necessary. Any sign erected pursuant to a special permit shall be removed at or prior to the time specified in the permit for the removal of such sign. If no time is specified, then such sign shall be removed not later than 10 days after notice from the code official to do so.

N101.7.7 Signs on Side Walls
Where no sign or signs exist on the side wall of any building or structure, no permit shall be issued for the erection, hanging or painting of a sign or signs on such side wall, except as provided in Sections N101.7.7.1 and N101.7.7.2.

N101.7.7.1 Corner Buildings and Alleys Entrances
The code official shall be authorized to issue permits to erect, hang, or paint a sign or signs on those side walls of a corner building which abut a public street, or on those side walls of buildings which have a public entrance opening for business purposes upon an alley, when such signs comply with the provisions of this section.

N101.10 Maximum Size of Signs
In any district other than Residential or Special Purpose Districts, the total area of sign or signs subject to the provisions of Section N101 and attached to, displayed from, or erected upon any building, lot, or parcel of land, shall not exceed the limits prescribed in Sections N101.10.1 through N101.10.7.

N101.10.1 One Story Buildings
Two square feet (0.19 m2) for each foot of width of front of building occupied by the business or profession to be advertised, such signs or signs to be placed on the front under consideration within the limits of the portion of the front in which the business advertised is located. Roof signs shall not exceed 100 square feet (9.29 m2) facing any one street frontage.

N101.10.2 First Floor Stores or Businesses in Multistory Buildings
The provisions of Section N101.10.1 shall apply, except that such signs shall be kept within a height of 20 feet (6096 mm) above the sidewalk.

N101.10.3 Upper Stories of Multistory Buildings
The total area of all signs above the 20-foot height specified in Section N101.10.2 shall not exceed the limits set forth in Table N101.10.3, for each street frontage.

Excerpts of Relevant D.C. Sign Code

TABLE N101.10.3
SIGNS ABOVE THE FIRST STORY

AREA OF WALL ABOVE 20 FEET ABOVE THE SIDWALK, ON STREET FRONTAGE (square feet)	MAXIMUM ALLOWABLE AREA OF SIGNS ABOVE 20 FEET ABOVE SIDEWALK ON STREET FRONTAGE
Up to 1600	40 ft^2
1600 to 4000	1/40 of area of wall above 20 ft height
Over 4000	100 ft^2 roof signs, or 1/40 of area of wall above 20 ft height for signs below roof

For SI: 1 square foot = 0.093 m^2.

N101.14 Obstructive Signs
No sign, including signs bearing noncommercial statements of fact, belief, or personal or political opinion posted on private property, shall be so erected, hung, or attached as to obstruct any window, door, fire escape, balcony, platform, stairway, ladder, stack, vent pipe, or egress from any building.

N101.17.12 Moratorium on Issuance of Special Signs
Other than for changes in artwork pursuant to Section N101.17.5, or for transfers of location pursuant to Section N101.17.7, new Special Sign Permits shall not be issued after November 9, 2000.

N101.17 Rules for Special Signs
The code official is authorized to issue a permit for a "Special Sign," as defined in Section N101.17.1. Special Signs shall be subject to the rules of this section and not to the rules in this chapter pertaining to billboards, poster panels, wall signs, and other specific types of signs. The rules of this section shall apply only to Special Signs.