

EXHIBIT D

COMPREHENSIVE PLAN AND RACIAL EQUITY IMPACT EVALUATION

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I. Racial Equity and the Comprehensive Plan

This proposed text amendment (the “**Petition**”), which eliminates the term limitation on office use of the second floor of the Lumber Shed Building, is not inconsistent with the Comprehensive Plan (the “**Comp Plan**”) and other adopted public policies.

A. Standard of Review for a Text Amendment

To adopt this Petition, the Zoning Commission must find that it “is not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject text,” as such Comp Plan, policies, and programs are understood *as a whole*. 11-X DCMR § 1300.2.

B. Relevant Planning Guidance

In the instant Petition, the relevant planning guidance includes (a) the Comp Plan’s two maps, (b) the District Elements, (c) Area Elements for the Lower Anacostia Waterfront / Near Southwest Planning Area, (d) the federally-approved Master Plan for the Southeast Federal Center (“**Master Plan**”), and (e) the Anacostia Waterfront Framework Plan (“**AWI Plan**”), all of which must be analyzed through the lens of racial equity in the District.

C. Racial Equity Lens

Equity, and specifically racial equity, is a primary focus of the Comp Plan, especially with respect to priorities such as creating or increasing access to opportunity. The Framework Element states that equity is both an outcome and a process, and it exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. 10A DCMR § 213.6. Considerations of racial equity are an integral part of the Zoning Commission’s evaluation and implementation of Comp Plan policies and actions, and the Commission has developed a Racial Equity Tool that guides this evaluation.

This narrative evaluates the Petition’s consistency with the Comp Plan in accordance with the Commission’s Racial Equity Tool.

II. Evaluation of Comprehensive Plan Consistency

Per **Part I (Racial Equity Analysis Submissions – Guidance Regarding the Comprehensive Plan)** of the Racial Equity Tool, the Petitioner has conducted an evaluation of the proposed Zoning Map amendment’s consistency with the Comp Plan, including the policies of all applicable Citywide and Area Elements, the Future Land Use Map (the “**FLUM**”), Generalized Policy Map (the “**GPM**”), and any other applicable adopted public policies and active programs.

Overall, when viewed through a racial equity lens, the Petitioner finds the proposal to be not inconsistent with the Comp Plan. **Table 1** below identifies the specific Comp Plan policies that are advanced by the Petition.

Table 1: Summary of Comp Plan Policies Advanced by the Proposed Zoning Map Amendment
Lower Anacostia Waterfront / Near Southwest Planning Area Element
AW-1.1.2, AW-1.1.7, AW 1.2.1, AW-2.3.6
Land Use Element
LU-1.2.1, LU-1.2.2, LU-1.2.3, LU-1.2.4, LU-2.4.1
Economic Development Element
ED-2.1.1, ED-2.1.4
Urban Design
UD-1.3.1
Historic Preservation
HP-2.5.3

The full text of all the Comp Plan policies listed above are included in the Appendix to this analysis beginning on page 8 below.

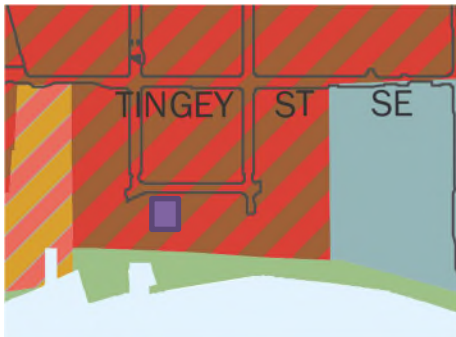
A. Southeast Federal Center Master Plan

Any evaluation of the Petition’s consistency with background planning principles begins with a consideration of the Master Plan.

Here, the Petition generally furthers well-established planning goals for the SEFC-4 zone. The Commission established zoning for the Southeast Federal Center two decades ago, in accordance with the Master Plan and in anticipation of its eventual disposition for non-Federal use. Pursuant to the Master Plan, the Commission mapped the future Waterfront Park (the “**Park**”) with the unique SEFC-4 zone, which mandated much of the area remain as open space but also allowed for the construction of active retail and other uses in a “development zone” within the Park. After the basic zoning framework was established, the General Services Administration selected Forest City as the master developer, and the Master Plan was amended to align with Forest City’s proposed development plan. The Master Plan was amended again in 2016, at which time NCPC aptly explained the addition of office use to the Lumber Shed building by specifically

acknowledging it in the Executive Director’s Recommendation and noting, “The land use changes ... address current development trends. Staff is supportive of these minor changes and notes that they will not greatly alter the overall land use mix and density.” This Petition is not inconsistent with the Master Plan and in fact ensures continued synergy between the Master Plan and the Zoning Regulations without altering the existing character of The Yards.

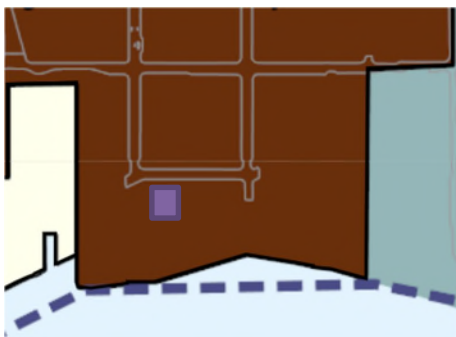
B. Future Land Use Map



The Lumber Shed Building is split designated on the FLUM as High Density Commercial and High Density Residential. The High Density Commercial designation includes areas that are “major office centers.” The High Density Residential designation means the area will be “suited for high-rise apartment buildings” with “pockets of less dense housing.”

The continuation of office use on the second floor of the Building is not inconsistent with the High Density Commercial designation. Given the large amount of residential in The Yards generally, the Petition actually advances the High Density Commercial use by securing a pocket of office use consistent with the FLUM and is also not inconsistent with the High Density Residential designation.

C. Generalized Policy Map



On the Generalized Policy Map, the Lumber Shed Building is designated as part of a “Regional Center.” Areas with this designation are likely to “have the largest range of commercial functions outside the Central Employment Area and are likely to have major department stores, many specialty shops, concentration of restaurants, movies, and other leisure or entertainment facilities [and] draw patrons from across the city, as well as patrons from nearby suburban area.” 10-A DCMR §225.19. The continuation of the small amount of office use proposed by this Petition, especially with the increase in daytime activity it brings to the area, supports the continued development of The Yards as a Regional Center.

Additionally, the Building is designated in a Resilience Focus Area. Development sites within a Resilience Focus Area are encouraged and expected to include neighborhood-wide and site-specific environmental solutions particularly with respect to flood hazard mitigations. The Petition is not inconsistent with this expectation.

D. Area Element: Lower Anacostia Waterfront / Near Southwest Planning Area Element

The Petition will further the continued growth of The Yards as an active and inclusive mixed-use and mixed-income neighborhood with a rich history that is consistent with the overall Area Element goals. Specifically, the text amendment will allow for a continued stream of daytime activity in the area, supporting the local economy and strengthening the active, regional character of Yards Park and its maritime character, both of which are also specific goals in the Area Element for Yards Park.

E. Citywide Elements

1. Land Use

The proposed text amendment will further facilitate the development of The Yards as an inclusive mixed-use neighborhood that benefits not only its immediate residents but also the broader District through a rich array of daytime economic activity and increased job opportunities within the district. The Petition will maintain a low-scale character and intensity of use by maintaining the current office use without preventing future retail use if such a need arises, which is consistent with the density- and use-balancing goals of the Land Use element.

2. Economic Development

The Petition facilitates office growth and options as well as an increase in jobs in the District in such a way that directly furthers the explicit policies of this element, including in particular a unique type of waterfront-proximate office space. Although this element also encourages an increase in retail, the proposed text amendment can still be found to support that goal by providing additional daytime economic activity in the area that complements and patronizes the existing retail. This combination of uses has proven successful thus far. As such, the Petition is not inconsistent with this element.

3. Urban Design

The Petition is not inconsistent with the Urban Design element’s waterfront priorities. Specifically, the Petition’s proposed continued office use in this area adjacent to the waterfront will maintain the diversity of experiences in The Yards while not impeding on the existing public space, waterfront access, and connectivity.

4. Historic Preservation

The redevelopment of the Lumber Shed Building resulted in a space that honors the historic character of the Building while at the same time adapting the structure to accommodate contemporary uses. Continued office use provides continued revenue to support the maintenance of the historic structure. The Petition advances this balanced approach.

III. Racial Equity as a Process

The Framework Element states that racial equity is, in part, 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 participate in decision-making processes fully and substantively. 10A 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 places a heavy emphasis on 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 an applicant to meaningfully 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. The responses were informed by the Petitioner’s research on the community that could potentially be impacted by the zoning action. More importantly, the responses were informed by the Petitioner’s direct outreach to the affected community in advance of submitting the proposal.

Table 2: Community Outreach and Engagement
Description of affected community (including defining characteristics).
<u>Affected Community</u> : We defined the affected community in several ways. First, we identified ANC 8F as the ANC covering the Lumber Shed Building. The ANC not only covers the site but also represents the residents of the Southeast / Capital Riverfront Area. Second, we included residents, visitors, and employees within The Yards overall who will be closest in proximity to the Building. Lastly, the Capitol Riverfront Business Improvement District is also included in the affected community because they market and support businesses along the Riverfront and adjacent to the Building.

Defining Characteristics: The defining characters of the community include its adjacency to the Anacostia Riverfront, role in the overall Master Plan for The Yards, and unique mixture of federal, residential, office, and retail uses.
Characteristics of the affected community that influenced outreach plan / efforts.
The characteristics of the affected community that influenced outreach are namely the community's proximity to the Anacostia Riverfront and likelihood of using The Yards.
Outreach methods utilized (including specific efforts employed to meet community needs and circumstances).
Email communication with ANC 8F and request for ongoing dialogue with community members.
Community outreach timeframe / dates of major meetings and points of engagement
Outreach began in 2024 with an outreach to ANC 8F, though such outreach is also part of a continuum of engagement with ANC 8F (and ANC 6D before that) on development and operational issues at The Yards. To date, Petitioner is not aware of any issues or concerns associated with office use at the Lumber Shed Building. Petitioner hopes to present at one of the ANC's upcoming meetings so it can address any potential community questions.
Members of the affected community that would potentially benefit from the proposed zoning action.
Members of the affected community include nearby residents and business-owners who will benefit from the continuation of daytime economic activity.
Members of the affected community that would potentially be burdened by the proposed zoning action.
The proposed action maintains an existing established use and thus does not appear to materially burden existing community members. Should potential burdens be identified, the Petitioner will engage to address such concerns.
Community input on existing conditions and current challenges that have resulted from past or present discrimination, and current ongoing efforts in the affected community to address these conditions.
None at this time; Petitioner will continue to engage in conversations with community.
Potential positive outcomes of the proposed zoning action identified by the affected community.
None at this time; Petitioner will continue to engage in conversations with community.
Potential negative outcomes of the proposed zoning action identified by the affected community.
None at this time; Petitioner will continue to engage in conversations with community.
Changes / modifications made to the proposed zoning action that incorporate / respond to input received from the affected community.
None at this time; Petitioner will continue to engage in conversations with community.
Input received from the affected community not incorporated into the proposed zoning action.
None at this time; Petitioner will continue to engage in conversations with community.

Efforts taken to mitigate potential negative outcomes identified by the affected community.
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None at this time; Petitioner will continue to engage in conversations with community.
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IV. Racial Equity as an Outcome

The Framework Element states that “equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. Equity is not the same as equality.” 10A DCMR 213.6. 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. 10A DCMR § 213.9

The narrative herein correlates the Project with several equitable development indicators. Among others, the indicators addressed in this analysis include those that are specifically included in **Part IV (Criteria to Evaluate a Zoning Action through a Racial Equity Lens)** of the Commission’s Racial Equity Tool.

Based on the proposed text amendment, the continued use of the second floor of the Lumber Shed Building for office use will not result in displacement or affect housing because no housing was ever anticipated for the Building. Conversely, the amendment may facilitate job creation, increased daytime economic activity, and access to opportunity in the District.

Appendix – List of Policies Advanced and Supported by the Petition

Lower Anacostia Waterfront / Near Southwest Planning Area Element

AW-1.1: Guiding Growth and Neighborhood Conservation

- AW-1.1.2: New Waterfront Neighborhoods: Create new mixed-use, mixed-income neighborhoods on vacant or underused waterfront lands, particularly on large contiguous publicly owned waterfront sites. Within the Lower Anacostia Waterfront/Near Southwest Planning Area, new neighborhoods should continue to be developed at the Southwest Waterfront, Buzzard Point, Poplar Point, and Navy Yard/Capitol Riverfront. These neighborhoods should be linked to new neighborhoods upriver at Reservation 13, and Kenilworth-Parkside via trails, additional water recreation opportunities, and improved park access points along the Anacostia shoreline. A substantial amount of new housing and commercial space should be developed in these areas, reaching households of all incomes, types, sizes, and needs. Opportunities for grid interconnected neighborhood-scale energy utilities systems as part of the development of these areas should be evaluated, using renewable energy sources to provide greater environmental benefits for the community. The new waterfront neighborhoods should integrate new parks and amenities, enhance public access to the waterfront, and incorporate resilient design to mitigate flooding.
- AW-1.1.7: Waterfront Area Commercial Development: Encourage commercial development in the waterfront area in a manner that is consistent with the Future Land Use Map. Such development should bring more retail services and choices to the Anacostia waterfront, as well as space for government and private sector activities, such as offices and hotels. A mix of high-density commercial and residential development should be focused along key corridors, particularly along Maine Avenue and M Street SE and SW, along South Capitol Street, and near the Waterfront and Navy Yard Metro stations. Maritime activities, such as cruise ship operations, should be maintained and supported as the waterfront redevelops.

AW-1.2: Conserving and Enhancing Community Resources

- AW-1.2.1: Historic and Cultural Waterfront Assets: Capitalize on the historic and cultural assets located near the Lower Waterfront, such as the Washington Navy Yard and Fort McNair. Public education about these assets should be expanded, the physical trail connections and wayfinding signage between them should be enhanced, and greater recognition of their value and importance should be achieved.

AW-2.3: Near Southeast / Capitol Riverfront

- AW-2.3.6: Near Southeast / Capitol Riverfront Urban Amenities: Leverage new and existing developments in the Near Southeast/Capitol Riverfront area to create

amenities, such as parks, trails, child-care facilities, civic uses, and retail space, that serve the area's residents and workforce. Encourage the redesign of Virginia Avenue Park into a more inviting park and green space that supports a wide range of users of all ages and abilities.

Land Use Element

LU-1.2: Strengthening the Core

- LU-1.2.1: Sustaining a Strong District Center: Provide for the continued vitality of Central Washington as a thriving business, government, retail, financial, hospitality, cultural, and residential center. Promote continued reinvestment in central District buildings, infrastructure, and public spaces; continued preservation and restoration of historic resources; and continued efforts to create safe, attractive, and pedestrian-friendly environments, while minimizing displacement of residents and community-focused businesses
- LU-1.2.2: CEA: Continue the joint federal/District designation of a CEA within Washington, DC. The CEA shall include existing core federal facilities, such as the U.S. Capitol Building, the White House, and the Supreme Court, as well as most of the legislative, judicial, and executive administrative headquarters of the U.S. government. Additionally, the CEA shall include the greatest concentration of the District's private office development, and higher-density mixed land uses, including commercial/retail, hotel, residential, and entertainment uses. Given federally imposed height limits, the scarcity of vacant land in the core of the District, and the importance of protecting historic resources, the CEA may include additional land necessary to support economic growth and federal expansion. The CEA may be used to guide the District's economic development initiatives and may be incorporated in its planning and building standards (e.g., parking requirements) to reinforce urban character. The CEA is also important because it is part of the point system used by the General Services Administration (GSA) to establish federal leases.
- LU-1.2.3: Appropriate Uses in the CEA: Ensure that land within the CEA is used in a manner which reflects the area's national importance, its historic and cultural significance, and its role as the center of the metropolitan region. Federal siting guidelines and District zoning regulations should promote the use of this area with high value land uses that enhance its image as the seat of the national government and the center of Washington, DC and that make the most efficient possible use of its transportation facilities. An improved balance in the mix of uses will help to achieve Washington, DC's aspiration for an even larger living downtown. Both the District and Federal Elements include a joint federal/District designation of a Central Employment Area (CEA) within Washington, DC. The CEA includes the existing core of federal facilities, such as the U.S. Capitol Building, the White House, as well as the Supreme Court, and most of the legislative, judicial, and

executive administrative headquarters of the United States government. The CEA is the District of Columbia's commercial core where the greatest concentration of employment is encouraged. Additional Federal Employment Areas, such as Parkside, are located in other parts of the District. Federal Employment Areas are also part of the GSA point system used to establish federal leases.

- LU-1.2.4: Urban Mixed-Use Neighborhoods – Near Southeast / Navy Yard: The location of these areas is shown in the Central Washington, and Lower Anacostia Waterfront/Near Southwest Area Elements. Land use regulations and design standards for these areas should require that they are developed as attractive pedestrian-oriented neighborhoods, with high quality architecture and public spaces. Housing, especially affordable and deeply affordable housing, is particularly encouraged and must be a vital component of the future land use mix. As areas continue to redevelop, community engagement and actions shall be undertaken to retain existing residents, particularly communities of color and vulnerable populations, and enable them to share in the benefits of area redevelopment while addressing adverse short- and long-term impacts.

LU-2.4: Neighborhood Commercial Districts and Centers

- LU-2.4.1: Promotion of Commercial Centers: Promote the vitality of commercial centers and provide for the continued growth of commercial land uses to meet the needs of residents, expand employment opportunities, accommodate population growth, and sustain Washington, DC's role as the center of the metropolitan area. Commercial centers should be inviting, accessible, and attractive places, support social interaction, and provide amenities for nearby residents. Support commercial development in underserved areas to provide equitable access and options to meet the needs of nearby communities

Economic Development Element

ED-2.1: The Office Economy

- ED-2.1.1: Office Growth: Plan for an office sector that will continue to accommodate government agencies and growth in government contractors, legal services, international business, trade associations, and other service-sector office industries. The primary location for this growth should be in Central Washington and the adjoining office centers, including NoMa, Capitol Riverfront, Buzzard Point, St. Elizabeths, and Poplar Point.
- ED-2.1.4: Diversified Office Options: Diversify the tenant base by attracting premium, mid-range, and low-cost office space users, and by supporting a range of office space types. Recognize that many firms may prefer low-cost space over premium office space.

Urban Design

UD-1.3 Designing the Waterfront for the Next Century

- Policy UD-1.3.1: Diverse Waterfront Experiences along the Anacostia River: Strengthen Washington, DC's civic identity as a waterfront city by promoting public and private investment along the Anacostia River waterfront and creating equitable and publicly accessible amenities for existing and new residents. Design a mix of new public parks and other natural areas to provide diverse waterfront experiences and help residents use the water as a community asset through programming and recreational amenities. Create continuous public access along both sides of the shoreline, integrate historic features and structures into new developments, preserve or restore habitat areas, and implement other design interventions to improve the physical and visual connections between the waterfront and adjacent neighborhoods.

Historic Preservation

HP-2.5 Review of Rehabilitation and New Construction

- Policy HP-2.5.3: Compatible Development: Preserve the important historic features of the District while permitting compatible new infill development. Within historic districts, respect the established form of development as evidenced by lot coverage limitations, height limits, open space requirements, and other standards that contribute to the character and attractiveness of those areas. Ensure that new construction, building additions, and exterior changes are in scale with and respect their historic context through sensitive siting and design, and the appropriate use of materials and architectural detail.