

EXHIBIT J

COMPREHENSIVE PLAN AND RACIAL EQUITY IMPACT EVALUATION

I. Racial Equity and the Comprehensive Plan

The proposed application (“**Application**”), an amendment to Johns Hopkins University’s (the “**Applicant**” or “**JHU**”) 1986 Campus Plan (“**Campus Plan**”) to revise the campus plan boundary to include only 1740 Massachusetts Avenue NW (“**1740 Mass**”)¹, is not inconsistent with the Comprehensive Plan (the “**Comp Plan**”) and other adopted public policies.

A. Standard of Review for a Campus Plan Amendment and Further Processing

To approve this Application, the Zoning Commission shall consider, to the extent they are relevant, the policies of the District Elements of the Comprehensive Plan. 11-X DCMR § 101.11.

B. Relevant Planning Guidance

In this Application, the relevant planning guidance includes the Campus Plan and the Comp Plan, including the Future Land Use Map (“**FLUM**”) and Generalized Policy Map (“**GPM**”), 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 Application’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, JHU has conducted an evaluation of the Application’s consistency with the Comp Plan, including the policies of all applicable Citywide and Area Elements, the FLUM, the GPM, and any other applicable adopted public policies and active programs.

¹ The Property at 1619 Massachusetts Avenue NW (“**1619 Mass**”) is currently part of the Campus Plan. JHU is in the process of selling 1619 Mass to another university. That other university is preparing and filing a separate campus plan application for 1619 Mass.

Overall, when viewed through a racial equity lens, the University finds the proposal to be not inconsistent with the Comp Plan and other adopted public policies. **Table 1** below identifies the specific Comp Plan policies that are advanced by the Application.

Table 1: Summary of Comp Plan Policies Advanced by the Proposed Campus Plan Amendments and Further Processing
Land Use Element
LU-2.3.5, LU-3.3.2
Economic Development Element
ED-2.4.1, ED-2.4.2
Educational Facilities Element
EDU-3.3.3
Central Washington Area Element
CW-1.1.3, CW-1.1.12

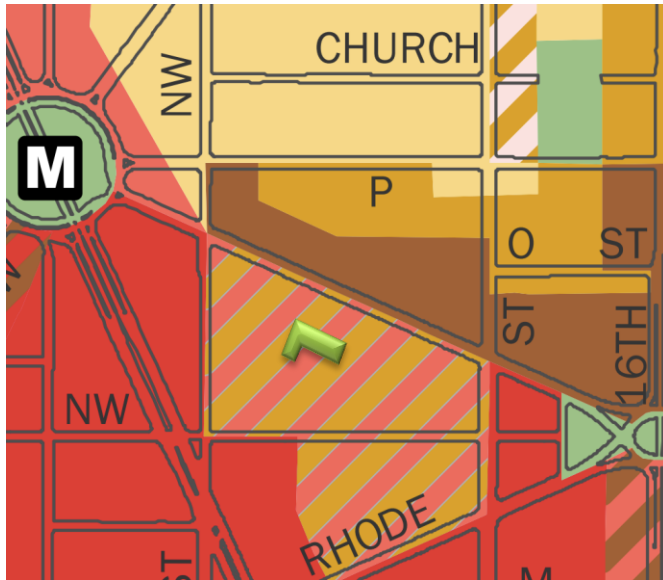
The full text of all the Comp Plan policies listed above are included in the Appendix to this analysis beginning on page 7 below.

A. Generalized Policy Map



1740 Mass is located in a “Neighborhood Conservation Area” on the Comp Plan’s GPM. These areas are primarily residential, although a “diversity of land uses and building types in these areas should be maintained.” The Application would not result in an expansion of the existing educational use; therefore, it is not inconsistent with the GPM.

B. Future Land Use Map



1740 Mass is designated “Mixed Use (Moderate Density Commercial / Medium Density Residential) on the Comp Plan’s FLUM. This designation defines areas where the mixing of two or more land uses is especially encouraged. The Application is not inconsistent with this designation as it will maintain the Applicant’s existing college / institutional use at 1740 Mass.

C. Citywide Elements

1. Land Use Element

The Application advances the Land Use Element of the Comp Plan for multiple reasons. First, the proposed amendment would not result in displacement of residents. Next, 1740 Mass will continue to be utilized for college / institutional use, which is a land use that is entirely compatible for a site that is within Central Washington and along this particular segment of Massachusetts Avenue.

2. Economic Development Element

The proposed amendment to the Campus Plan directly advances the Comp Plan’s Economic Development Element because it will maintain a strong institutional presence at 1740 Mass and in the District, which will continue to support the District’s higher education economy and related industries.

3. Educational Facilities Element

The proposed amendment is consistent with the Educational Facilities Element because it will maintain the educational use at 1790 Mass.

D. Area Element

1. Central Washington Area Element

The Application is not inconsistent with the policies of the Central Washington Element as the continued presence of the Applicant’s college / university use at 1740 Mass will allow it to contribute to the District’s ongoing efforts to revitalize Central Washington, including support for growth in the college / university educational sector as set forth in the D.C. Comeback Plan.

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 Applicant’s research on the community that could potentially be impacted by the zoning action. More importantly, the responses were informed by the Applicant’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> : The primary affected community is ANC 2B and the area surrounding 1740 Mass.
<u>Defining Characteristics</u> : The defining characteristic of this community is its adjacency to several other institutions, non-profits, chanceries, offices, and high-density residential uses.
Characteristics of the affected community that influenced outreach plan / efforts.
The affected community’s proximities influenced outreach plans and efforts.
Outreach methods utilized (including specific efforts employed to meet community needs and circumstances).
The Applicant described the Application to the ANC via email and presented (via Zoom) the proposed action to ANC 2B’s Land Use Committee meeting on October 1, 2024.
Community outreach timeframe / dates of major meetings and points of engagement
The Applicant presented the Application to ANC 2B’s Land Use Committee at its October 1, 2024, meeting. The Applicant will request to be added to the full ANC agenda soon after filing the Application.

Members of the affected community that would potentially benefit from the proposed zoning action.
Members of the community that would benefit include those that would use university programs at 1740 Mass. In addition, surrounding business owners and operators would benefit from patrons who are also users of 1740 Mass.
Members of the affected community that would potentially be burdened by the proposed zoning action.
None at this time; JHU will continue to engage in conversations with the community.
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; JHU will continue to engage in conversations with the community.
Potential positive outcomes of the proposed zoning action identified by the affected community.
The continued activation of 1740 Mass for higher education use along the Massachusetts Avenue corridor.
Potential negative outcomes of the proposed zoning action identified by the affected community.
None
Changes / modifications made to the proposed zoning action that incorporate / respond to input received from the affected community.
None
Input received from the affected community not incorporated into the proposed zoning action.
None
Efforts taken to mitigate potential negative outcomes identified by the affected community.
None

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 following table considers the Application against several equitable development indicators, including 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. As shown, the Application has a neutral impact on racial equity.

Table 3: Evaluation of Equitable Development Indicators						
Key:	Positive Outcome	●	Negative Outcome	●	Neutral Outcome	●
Indicator		Aspect(s) of Zoning Action Relating to Racial Equity			Potential Racial Equity Outcome	
Displacement						
Direct Displacement		· No direct displacement of residents or businesses will be caused by this Application			●	
Indirect Displacement		· No indirect displacement of residents or businesses will be caused by this Application			●	
Housing						
Changes to Housing		· No change to housing is contemplated by this Application			●	
Access to Opportunity						
Education		· The Application involves the continued activation of 1740 Mass for higher educational use			●	
Job Creation/Training		· No impact			●	
Healthcare / Retail / Other Services		· No impact			●	
Changes to the Built Environment						
Public Space / Streetscape		· No impact			●	
Infrastructure Improvements		· No impact			●	
Access to Transit		· No impact			●	
Environmental Changes		· No impact			●	
Arts and Culture		· No impact			●	

Appendix – List of Policies Advanced and Supported by the Application

Land Use Element

LU-2.3: Residential Land Use Compatibility

- LU-2.3.5: Institutional Uses: Recognize the importance of institutional uses, such as private schools, childcare facilities, hospitals, churches, and similar uses, to the economy, character, history, livability, and future of Washington, DC and its residents. Ensure that when such uses are permitted in residential neighborhoods, their design and operation is sensitive to neighborhood issues and neighbors' quality of life. Encourage institutions and neighborhoods to work proactively to address issues, such as transportation and parking, hours of operation, outside use of facilities, and facility expansion.

LU-3.3: Institutional Uses

- LU-3.3.2: Corporate Citizenship: Support continued corporate citizenship among large institutions, including colleges, universities, hospitals, private schools, and nonprofits. Given the large land area occupied by these uses and their prominence in the community, institutions (along with the District itself) should be encouraged to be role models for smaller employers in efforts to improve the physical environment. This should include a continued commitment to high-quality architecture and design on local campuses, expanded use of green building methods and low-impact development, and adaptive reuse and preservation of historic buildings.

Economic Development Element

ED-2.4: The Institutional Economy

- ED-2.4.1: Institutional Growth: Support growth in the higher education and health care sectors. Recognize the potential of these institutions to provide employment and income opportunities for District residents, and to enhance the District's array of cultural amenities and health care options.
- ED-2.4.2: Secondary Benefits: Promote the development of local businesses and enterprises that rely on the concentration of universities and health care institutions in the District, including both firms that provide supplies to these industries and firms that benefit from their knowledge and research capacity.

Educational Facilities Element

EDU-3.3 Colleges, Universities, and Neighborhoods

- EDU-3.3.3: Universities as Large Landowners and Campus Plan Requirements: Continue to require campus plans for colleges and universities located in residential and mixed-use zone districts. These plans should be prepared by the institutions themselves, subject to District review and approval, and should address issues raised by the surrounding communities. Each campus plan should include

provisions that respect neighbors and neighboring property and ensure that potentially objectionable impacts such as noise, traffic, number of students, or other similar conditions are addressed.

Central Washington Element

CW-1.1 General Policies

- CW 1.1.3: Incentives for Non-Office Uses: Take action to attract non-office uses within the area to create a vibrant collection of central neighborhoods. Continue using zoning and other regulatory mechanisms to incentivize mixed-use development, including housing, ground floor retail, educational uses, and arts facilities in locations consistent with the Comprehensive Plan.
- CW 1.1.12: Creating Active Street Life and Public Spaces: Promote active street life throughout Central Washington through the design of buildings, streets, and public spaces. This should include:
 - Discouraging second-level pedestrian bridges, underground walkways, and underground or privatized cafeterias that drain activity from Central Washington streets;
 - Encouraging multiple entrances in large projects to increase street-level activity;
 - Managing certain streets so they can be easily closed to traffic on special occasions for pedestrians;
 - Providing streetscape improvements that make downtown streets more comfortable and attractive;
 - Encouraging active ground floor uses and discouraging wide building entrances, large internal lobbies, and street-facing garage entrances and loading areas;
 - Creating and managing well-designed public spaces that provide space for spontaneous performances, programmed entertainment, social interaction, and activities like farmers markets;
 - Supporting collaboration with NPS to accommodate national and local needs at federally owned parks in the heart of the central business district, such as Pershing and John Marshall Parks, Freedom Plaza, and Franklin, McPherson, Lafayette and Farragut Squares, while emphasizing the need for federal agencies to maintain their open spaces, parks, and monuments in a timely and proper manner; and
 - Making Pennsylvania Avenue NW a destination showcasing Washington, DC's economic, cultural, and civic strength on local and national levels.