

EXHIBIT K

COMPREHENSIVE PLAN AND RACIAL EQUITY IMPACT EVALUATION

TABLE OF CONTENTS

I. Racial Equity and the Comprehensive Plan	1
II. Evaluation of Comprehensive Plan Consistency.....	2
III. Racial Equity as a Process	4
IV. Racial Equity as an Outcome	7
Appendix – List of Policies Advanced and Supported by the Application.....	9

I. Racial Equity and the Comprehensive Plan

The proposed application (“**Application**”), an amendment to and further processing of Georgetown University’s 2017 Campus Plan (“**Campus Plan**”) to add field lighting to Shaw Field, 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 the instant Application, the relevant planning guidance includes (a) the Campus Plan, (b) the Comp Plan’s two maps, (c) the District Elements, and (d) Area Element for the Near Northwest Element, 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, the University has conducted an evaluation of the Application’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 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-3.3.1, LU-3.3.2, LU-3.3.3, LU-3.5.3
Transportation Element
Action T-3.1A
Environmental Protection Element
E-6.2.5, Action E-6.2.E, E-6.6.3, Action E-6.6.4
Parks, Recreation, and Open Space Element
PROS-3.1.5, PROS-3.1.6
Educational Facilities Element
EDU-3.2.2, EDU-3.3.3
Near Northwest Element
NNW-1.1.4, NNW-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 11 below.

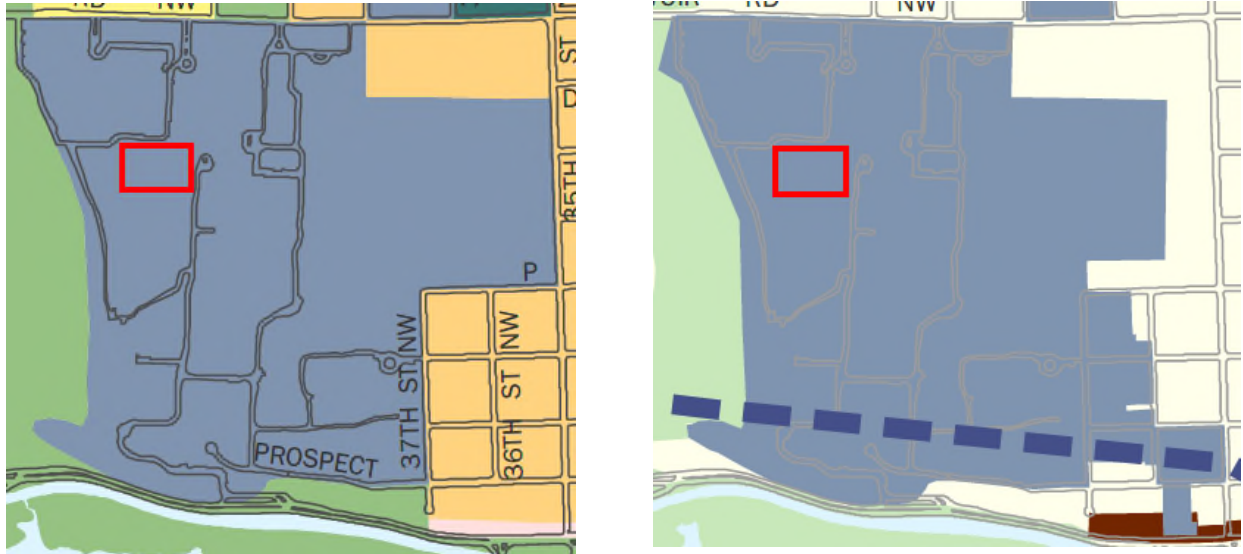
A. Campus Plan

A thorough assessment of the Application’s consistency with background planning principles begins with a consideration of the Campus Plan. The Campus Plan identifies multiple athletic and recreational facilities on the Campus, including Shaw Field, and so the continued use of the field for athletic purposes is consistent with the Campus Plan.

The proposal to add lighting to Shaw Field arises out of the same collaborative and consensus-driven process that led to the Campus Plan. As explained in the Application, the University engaged with neighborhood stakeholders over a series of months to review and address concerns regarding the proposal. In doing so, the University commissioned evaluations of potential

lighting and noise impacts in the neighborhoods, shared and discussed findings with community representatives, and developed mitigation measures to minimize these and other impacts.

B. Future Land Use Map (“FLUM”) and Generalized Policy Map (“GPM”)



On both the FLUM (left) and the GPM (right), Shaw Field (outlined in red) is located on portions of the Hilltop Campus designated for Institutional Use. Institutional Uses areas represent colleges and universities, and “change and infill can be expected on each campus consistent with campus plans.” Intercollegiate athletic competition is a significant part of university use, and the addition of field lighting to support the men’s and women’s soccer programs supports the continued use of the Hilltop Campus for university use.

C. Citywide Elements

1. Land Use Element

The limits on the use of Shaw Field, design of the lighting system, and commitment on start times for games all facilitate policies in the Land Use element that support and encourage University operations to minimize impacts and be sensitive to neighborhood quality-of-life concerns around transportation and parking as well as the use and expansion of campus facilities.

1. Transportation Element

The University's commitment to limit start times during the week to times outside of the peak hours of afternoon traffic further action elements in the Transportation Element to reduce rush hour traffic.

2. Environmental Protection Element

The Application is not inconsistent with policies in the Environmental Protection Element regarding noise and lighting impacts. The University has designed the proposed lighting to minimize light spillage and developed operational protocols to manage noise emanating from gameday events, and noise and lighting studies affirm that the proposed field lighting and associated hours of use will not generate incompatible noise and lighting impacts on surrounding residential neighborhoods.

3. Parks, Recreation, and Open Space Element

In furtherance of policies in the Parks, Recreation, and Open Space Element, the University has engaged with representatives of the National Park Service to affirm that the light and noise impacts associated with the Application are managed given the proximity of Shaw Field to Glover Archbold Park.

4. Educational Facilities Element

The Application furthers policies in the Educational Facilities Element that encourage the continued use of the campus plan process to address and mitigation issues raised by surrounding communities regarding lighting, noise, traffic, and parking impacts associated with the Application.

D. Area Element

1. Near Northwest Area Element

The Application furthers goals in the Near Northwest Area element to minimize and mitigate negative impacts associated with private institutional organizations and uses.

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 University’s research on the community that could potentially be impacted by the zoning action. More importantly, the responses were informed by the University’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).
<p><u>Affected Community:</u> The affected community for the Hilltop Campus is well-defined by the Georgetown Community Partnership (“GCP”), which includes representatives of both ANC 2E and ANC 3D, the ANCs covering the Hilltop Campus, as well as the Citizens Association of Georgetown, the Burleith Citizens Association, and the Foxhall Community Citizens Association, which represent the residents of the surrounding residential neighborhoods, and the Georgetown University Student Association, which represents the students who live on and near the Hilltop Campus. The makeup of the GCP also reflects the parties to prior Campus Plan proceedings.</p> <p>In addition, other smaller neighborhoods proximate to Shaw Field, including The Cloisters and Hillandale, are part of the potentially affected community. For similar reasons, the nearby Glover-Archbold Park, managed by the National Park Service, is a potentially affected area.</p> <p><u>Defining Characteristics:</u> The defining characters of the community include its adjacency to the Hilltop Campus and role in the development of the Campus Plan</p>
Characteristics of the affected community that influenced outreach plan / efforts.
<p>The characteristics of the affected community that influenced outreach are their proximity to Shaw Field as well as their longtime participation in the GCP as well as in prior Campus Plan proceedings.</p>
Outreach methods utilized (including specific efforts employed to meet community needs and circumstances).
<p>Outreach occurred through a series of meetings and discussions with representatives of each of the affected community groups, including initial meetings to review the proposed field lighting and gather feedback on potential issues and concerns, followed by subsequent meetings and discussions to review the findings of noise and lighting evaluations and discuss mitigation measures and commitments. These efforts all led to review and discussion of the proposals by the full GCP Steering Committee.</p>

In addition to engagement through the GCP process, the University mailed out a notice of intent to all owners within 200 feet regarding the Application and presented the Application at regularly-scheduled ANC 2E and ANC 3D meetings.
Finally, the University reached out to and met with representatives of NPS regarding the Application.
Community outreach timeframe / dates of major meetings and points of engagement
Discussions began in June 2024 and took place over a series of months. The GCP Steering Committee meeting took place on November 1, 2024. The University mailed out the notice of intent in September 2024 and presented the Application to each ANC at their October public meetings. (Note: ANC 2E's October meeting took place on September 30.)
Members of the affected community that would potentially benefit from the proposed zoning action.
Georgetown University undergraduate students, including in particular members of the women's and men's soccer teams.
Members of the affected community that would potentially be burdened by the proposed zoning action.
Those who live on campus or in the residential neighborhoods surrounding campus could be impacted by the proposed zoning action.
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; the University will continue to engage in conversations with community.
Potential positive outcomes of the proposed zoning action identified by the affected community.
Members of the University's men's and women's soccer teams will benefit from the Application because they will gain greater flexibility in scheduling practices and games. Adjusted hours and the ability to expand scheduling of postseason games will also potentially increase attendance by other on-campus students, which will further benefit the teams as well as further the development of on-campus student life and socializing.
Potential negative outcomes of the proposed zoning action identified by the affected community.
While Shaw Field is already used for soccer games and practices during the day, those who live on or near the campus could be impacted by light spillage as well as noise and traffic resulting from the extended use of Shaw Field for evening games and practices.

Changes / modifications made to the proposed zoning action that incorporate / respond to input received from the affected community.
No modifications have been made to the proposed zoning action, but mitigation measures (discussed below) have been developed.
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.
The University has developed a series of mitigation measures to minimize the impacts from the extended use of Shaw Field. To minimize light spillage, the University has worked with its consultant to utilize best available technology. To minimize noise, the University has agreed to limit the use of Shaw Field to only men’s and women’s soccer; limit amplified noise to only during games; and end all games by 10 PM (with exceptions only for penalty kick shootouts that take place after overtime). To minimize traffic, the University has agreed to add Shaw Field to a Campus Plan condition that requires any weekday event at the field that may draw over 100 persons to begin before 4 PM or after 7 PM. Light and noise studies confirm that impacts during use will be minimal in the neighborhoods surrounding the Hilltop Campus.

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 caused by Application.			●	
Indirect Displacement		· No indirect economic or cultural displacement; proposed conditions included to ensure use of Shaw Field does not lead to an increase in impacts in the neighborhoods surrounding the Hilltop			●	
Housing						
Changes to Housing		· No changes to housing.			●	
Access to Opportunity						
Education		· No impact.			●	
Job Creation/Training		· No impact.			●	
Healthcare / Retail / Other Services		· No impact.			●	
Changes to the Built Environment						
Public Space / Streetscape		· No impact.			●	
Infrastructure Improvements		· The Application adds field lights to Shaw Field; measures have been adopted to minimize impacts and so the action will not adversely impact racial equity.			●	
Access to Transit		· No impact.			●	
Environmental Changes		· Again, mitigation measures minimize the impact associated with extending the use of Shaw Field.			●	
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-3.3.1: Transportation Impacts of Institutional Uses: Support ongoing efforts by institutions to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, public transportation, shuttle service and bicycling; providing on-site parking; and undertaking other transportation demand management measures.
- 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.
- LU-3.3.3.: Nonprofits, Private Schools, and Service Organizations: Plan, design, and manage large nonprofits, service organizations, private schools, seminaries, colleges and universities, and other institutional uses that occupy large sites within residential areas in a way that minimizes objectionable impacts on adjacent communities. Expansion of these areas should not be permitted if the quality of life in adjacent residential areas is significantly adversely impacted.
- LU-3.5.3: Recognition of Local Planning and Zoning Regulations. Encourage the federal government to abide by local planning and zoning regulations to the maximum extent feasible. Ensure federal partners are aware of local priorities and goals, and when decisions require the input or actions of federal agencies, encourage swift decision-making so as to not delay achievement of local goals.

Transportation Element

T-3.1: Transportation Demand Management

- Action T-3.1A: TDM Strategies. Develop strategies and requirements that reduce rush hour traffic by promoting flextime, carpooling, and transit use where consistent with maintaining workplace productivity, to reduce vehicular trips particularly during peak travel periods. Identify TDM measures and plans as vital conditions for large development approval. Transportation Management Plans should identify quantifiable reductions in motor vehicle trips and commit to measures to achieve those reductions. Encourage the federal and District governments to explore the creation of a staggered workday, where appropriate, to reduce congestion, and implement TDM initiatives through a pilot program that focuses on the District government and public schools. Assist employers in the District with implementation of TDM programs at their worksites, to reduce drive-alone commute trips. Through outreach and education, inform developers and District residents of available transportation alternatives and the benefits these opportunities provide.

Environmental Protection

E-6.2: Controlling Noise

- E-6.2.5: Noise and Land Use Compatibility: Avoid locating new land uses that generate excessive noise adjacent to sensitive uses such as housing, hospitals, and schools. Conversely, avoid locating new noise-sensitive uses within areas where noise levels exceed federal and District guidelines for those uses.
- Action E-6.2.E: Measuring Noise Impacts. Require evaluations of noise impacts and noise exposure when largescale development is proposed, and when capital improvements and transportation facility changes are proposed.

E-6.6: Other Hazards and Pollutants

- E-6.6.3: Light Pollution: Consistent with the goals of Sustainable DC, maintain regulations for outdoor lighting to reduce light pollution, conserve energy, and reduce impact on wildlife, particularly migratory birds. Particular attention should be given to preventing glare and nighttime light trespass near the Naval Observatory, so that its operational needs are respected.
- Action E-6.6.4: Managing Backlight, Uplight, and Glare: Work to reduce backlight, uplight, and glare and identify programmatic improvements such as increased education and outreach on light standards and requirements.

Parks, Recreation, and Open Space Element

PROS-3.1 Sustaining and Enhancing the Federal Open Space Systems

- PROS-3.1.5: Tributary Parks: Maintain the scenic open space qualities and ecology of the District’s stream valley parks, including tributaries to the Potomac and Anacostia rivers and tributaries to Rock Creek. Create and maintain hiking and walking paths along tributary streams as appropriate to preserve habitats, minimize erosion, and preserve trees. Ensure that development adjacent to stream valley corridor parks does not compromise visual and ecological values and access to natural and forested areas
- PROS-3.1.6: Maintain and design public and private development adjacent to the edges of open spaces and parks to be compatible with these parklands and improve park access and safety.

Educational Facilities Element

EDU-3.2 Educational Partnerships

- EDU-3.2.2: Corporate Citizenship: Support continued corporate citizenship among Washington, DC’s large institutions, including its colleges, universities, hospitals, private schools, and nonprofits. 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 the adaptive reuse and preservation of historic buildings.

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.

Near Northwest Element

NNW-1.1 General Policies

- NNW-1.1.4: Nonprofits and Private Service Organizations: Work with private service and nonprofit organizations in the Near Northwest area to ensure that their locations and operations complement neighboring properties and enrich the surrounding communities. In particular, the campus plans of Georgetown University and GW should minimize negative impacts to surrounding residential areas and should aspire to improve such areas through improved landscaping, better lighting, safer pedestrian connections, cultural amenities, and enhanced community policing.

- NNW-1.1.12: Managing Transportation Demand: Strongly support buses, private shuttles, and other transit solutions that address travel needs within the Near Northwest area, including connections between Metro and the universities and the Georgetown commercial district, and connections between the Connecticut Avenue and Embassy Row hotels and the National Mall and downtown areas.