

Exhibit B

EVALUATION OF CONSISTENCY WITH THE DC COMPREHENSIVE PLAN

Pursuant to 11-X DCMR § 500.3, the Zoning Commission shall find that the proposed Gallaudet University (“Gallaudet” or “University”) campus plan amendment and related further processing of its plans for the extensive renovation and reimagining of the Merrill Learning Center (“MLC”) is not inconsistent with the Comprehensive Plan (“Comp Plan”) and with other adopted public policies and active programs related to the subject site. Through a racial equity lens, this Evaluation of Consistency with the D.C. Comprehensive Plan (“Evaluation”) provides a thorough analysis of the amendment’s consistency with the Property’s applicable designations under the Future Land Use Map (“FLUM”) and Generalized Policy Map (“GPM”), relevant policies of the Upper Northeast Area Element, and other Citywide elements of the Comp Plan. In addition, this Evaluation includes a summary of community outreach and an analysis of outcomes that advance racial equity.

General Highlights:

- When analyzed through a racial equity lens, the campus plan amendment and related further processing creates favorable outcomes for all District residents, and in particular, the Gallaudet community, by allowing the renovation of an older campus library and learning center and repurposing to provide a state of the art archives, video studio, American Sign Language (“ASL”) laboratory, lecture hall and other learning spaces, and modern amenities.
- The proposed campus plan amendment and related further processing is not inconsistent with the Property’s FLUM and GPM designations.
- Overall, when viewed through a racial equity lens, the University finds the proposal for the building renovation to be not inconsistent with the Comp Plan and its policies. The policies that will be advanced by the proposal are identified in Section II below.
- The outcomes of the campus plan and further processing will advance racial equity by providing additional resources for the Gallaudet community. These resources will ensure equal access to information, offer inclusive collections that represent diverse communities, support students with academic tools to help level the educational playing field, and create a safe environment for people of all racial and ethnic backgrounds and abilities.
- The renovation will promote racial equity by creating additional archives and learning spaces within the center, allowing more students, particularly those from underserved communities, to benefit from expanded educational opportunities. By adaptively reusing the existing building, the project will create a new, inclusive space for the Gallaudet community that provides areas for learning, gathering, access to resources, and archives. Additionally, landscaped outdoor areas are designed to mitigate the urban heat island effect, improve stormwater management, and provide accessible green spaces for all, supporting well-being and community engagement in safe, welcoming environments.

These outdoor areas will offer equitable access to safe, welcoming environments that support well-being and community engagement.

- The campus plan and further processing will advance several Comp Plan policies in the land use, environmental preservation, and educational facilities categories.

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I. Racial Equity and the Comprehensive Plan

Gallaudet submits this Evaluation of the Comp Plan through a Racial Equity Lens in support of an amendment to its approved university campus plan and for related further processing (the “Application”). The property is identified as Lot 4 in Square 3593, (the “Property”). As set forth below, the proposed amendment and further processing is not inconsistent with the Comp Plan as adopted by the D.C. Council pursuant to D.C. Law L23-0217 (Comprehensive Plan Amendment Act of 2017) and D.C. Law 24-0020 (Comprehensive Plan Amendment Act of 2020), including the GPM and FLUM (D.C. Resolution R24-0292), collectively referred to herein as the “Comp Plan”.¹

As stated in the Framework Element and as further discussed below, equity is both an outcome and a process. *See* 10-A DCMR § 213.6. Equity exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. Equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. An important factor to advancing racial equity is to acknowledge that equity is not the same as equality. *Id.*

A. Racial Equity as a Process

The Framework Element states that racial equity is 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 fully and substantively participate in decision-making processes. *See* 10-A DCMR § 213.7. The University believes in inclusive, community engagement. To this end, the University has and will continue to work closely with the community and the affected Advisory Neighborhood Commissions throughout the Zoning Commission’s review of the Application.

B. 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.” *See* 10-A DCMR § 213.6. As stated above, under the Comp Plan, the Commission shall carry out its Comp Plan evaluation for the Application through a racial equity lens. The table in Section VII correlates the proposed campus plan amendment with a number of equitable development indicators in general terms. As the table shows, the Application has the potential to address a number of equity issues experienced by residents in the neighborhood surrounding the Property.

The following evaluation follows the Zoning Commission’s Racial Equity Tool,² organized in four parts.

¹ D.C. Law L23-0217 took effect on August 27, 2020, and included amendments to the Comprehensive Plan Framework Element. D.C. Law L24-0020 took effect on August 21, 2021, and included amendments to the Comprehensive Plan general, citywide, and area elements, and the Generalized Policy Map and Future Land Use Map. The Generalized Policy Map and Future Land Use Map were formally approved on November 16, 2021, pursuant to Resolution No. R24-0292.

² Available at: <https://dcoz.dc.gov/release/zc-racial-equity-analysis-tool-new>.

II. Part One: Racial Equity Analysis Submissions (Guidance Regarding the Comprehensive Plan)

As required by Part One of the Racial Equity Tool, the University has conducted a thorough evaluation of the Application's consistency with the Comp Plan, including the FLUM, GPM, the policies of all applicable Citywide and Area Elements, and all other applicable adopted public policies and active programs.

A. Future Land Use Map

The FLUM shows the general character and distribution of recommended and planned uses across the city, and, along with the GPM, is intended to provide generalized guidance on whether areas are designated for conservation, enhancement, or change. *See* 10-A DCMR §§ 200.5, 224.4. The land use category descriptions on the FLUM describe the general character of development in each area, citing typical Floor Area Ratios as appropriate. By definition, the FLUM is to be interpreted broadly, and the land use categories identify desired objectives. *See* 10-A DCMR § 228.1(a).

As shown below, the FLUM designates the Property as **Institutional**.



Figure 1: Future Land Use Map

This designation includes land and facilities occupied and used by colleges and universities, and Gallaudet University is consistent with this designation.

The proposed amendment to the campus plan that would facilitate the renovation and reimagining of the MLC is consistent with the FLUM Institutional designation because it will provide enhanced facilities in support of the University's mission as a leader in research and education.

B. Generalized Policy Map

The purpose of the GPM is to categorize how different parts of the District may change between 2005 and 2025. It highlights areas where more detailed policies are necessary, both within the Comp Plan and in follow-up plans, to manage this change. *See* 10-A DCMR § 225.1. The GPM is intended to “guide land use decision-making in conjunction with the Comp Plan text, the FLUM, and other Comp Plan maps. Boundaries on the map are to be interpreted in concert with these other sources as well as the context of each location.” *See* 10-A DCMR § 225.2.

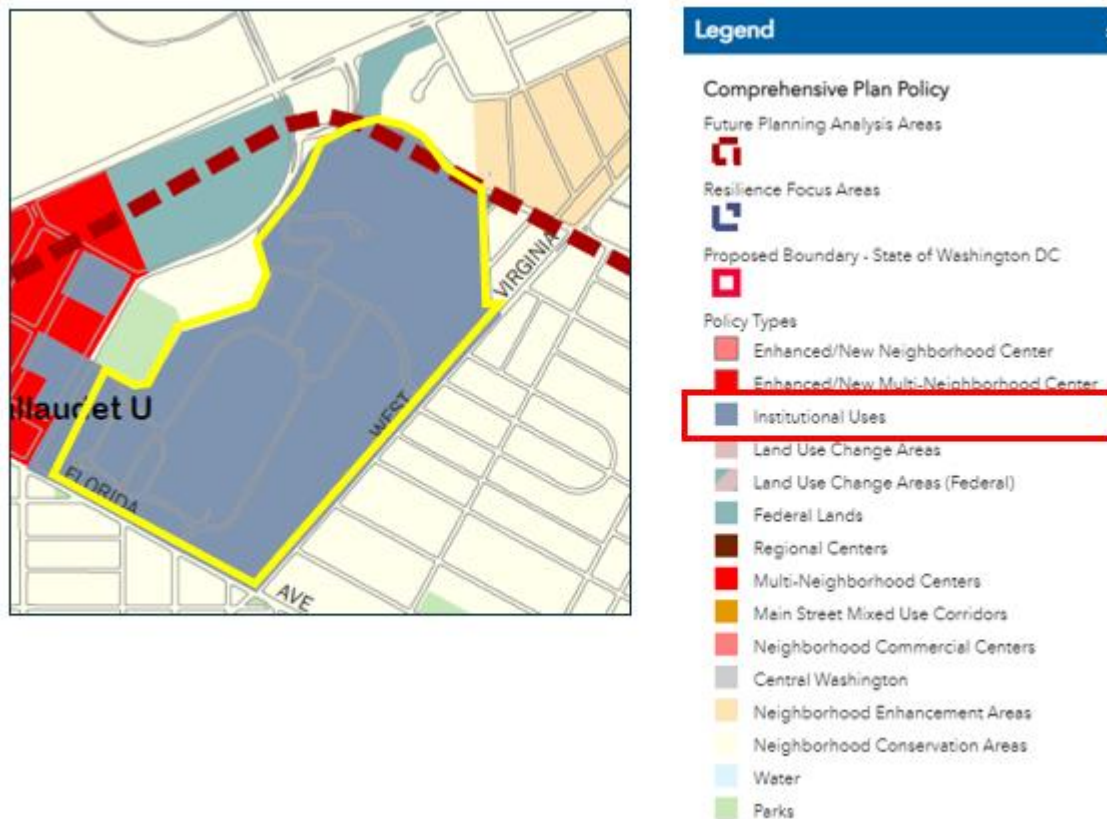


Figure 2: Generalized Policy Map

The Gallaudet Campus is designated as **Institutional** on the GPM. This designation represents colleges and universities, where change and infill can be expected consistent with the campus plan. The proposed amendment to the campus plan to renovate the MLC is consistent with this designation.

C. Upper Northeast Area Element

The proposed MLC redevelopment, which will include extensive new landscaping and hardscaping, can enhance the character of Upper Northeast by improving institutional open space and facilities. By incorporating outdoor areas and green spaces, the renovation supports Policy UNE-1.2.7, which emphasizes the importance of institutional open spaces. These changes also

align with long-term goals of creating new parks and open spaces that benefit both the university and the surrounding communities.

From a racial equity perspective, the renovation can serve as a valuable community resource, providing equitable access to educational spaces and connecting underserved communities to Gallaudet's open spaces. By improving access to the campus and its outdoor areas, the renovation helps address disparities in access to public amenities for historically marginalized communities. It also supports economic and social mobility by providing educational opportunities and creating inclusive spaces that benefit residents from diverse backgrounds, advancing racial equity and fostering community integration.

The proposed campus amendment and further processing will not be inconsistent with the Upper Northeast Area Element overall, and specifically with the policy listed below.

UNE-1.2 Conserving and Enhancing Community Resources

- UNE-1.2.7: Institutional Open Space

D. Land Use Element

In line with **Policies LU-3.3.2** and **LU-3.3.3**, the project will prioritize green building methods, adaptive reuse, and sustainable landscaping practices, serving as a model for local institutions while preserving the historic character of the campus. Consistent with **Policy LU-2.1.1: Variety of Neighborhood Types**, the project will preserve the campus's historic identity and design character while thoughtfully integrating adaptive reuse to support the Gallaudet community with a variety of spaces and resources while enhancing racial equity and opportunity.

Additionally, by prioritizing rehabilitation over demolition, the project aligns with **Policy LU-2.1.4: Rehabilitation Before Demolition**, encouraging the adaptive reuse of existing buildings. This approach minimizes waste, retains the architectural significance of the campus, and respects the surrounding community. Thoughtful design of outdoor spaces and careful management of campus expansions will minimize adverse impacts on the surrounding area, enhancing campus livability and environmental quality. Through these actions, the University fosters a more equitable and inclusive community by ensuring that campus developments benefit the Gallaudet community, balancing growth with the preservation of cultural and historic value.

The proposed campus amendment and further processing is not inconsistent with the Land Use Element overall, and specifically with the policies listed below.

LU-2.1 A District of Neighborhoods

- LU-2.1.1: Variety of Neighborhood Types
- LU-2.1.4: Rehabilitation Before Demolition

LU-3.3 Institutional Uses

- LU-3.3.2: Corporate Citizenship
- LU-3.3.3: Nonprofits, Private Schools, and Service Organizations

E. Transportation Element

Aligned with **Policy T-1.1.3: Context-Sensitive Transportation** and **Policy T-1.1.4: Transit-Oriented Development**, the adaptive reuse of the MLC emphasizes pedestrian-friendly design, enhancing both campus walkability and seamless connections to nearby pedestrian facilities and transit options. These upgrades prioritize accessibility for all users, making the campus environment more inclusive and supportive of sustainable transit. In line with **Policy T-2.2.2: Connecting District Neighborhoods**, the project's improvements in pedestrian facilities are intended to reduce existing physical barriers, increasing campus openness and fostering a more connected relationship with adjacent neighborhoods. By advancing **Policies T-2.3.1, T-2.4.1, and T-2.4.2**, the project integrates pedestrian infrastructure with well-defined paths and crossings, creating a cohesive, safe, and accessible pedestrian network that enhances overall campus mobility and accommodates the differing abilities of the Gallaudet community. These enhancements serve to bolster the University's goal of creating a campus that is integrated, sustainable, and welcoming, offering benefits that extend to students, faculty, and the broader community.

The adaptive reuse of the MLC promotes racial equity by enhancing accessibility and walkability for all users, particularly marginalized communities that face systemic mobility barriers. By improving pedestrian facilities and fostering connections between the University and surrounding neighborhoods, the project encourages social cohesion and cultural exchange among diverse racial and ethnic groups. Its inclusive design acknowledges varying abilities within the Gallaudet community, ensuring safe navigation for everyone.

T-1.1 Land Use: Transportation Coordination

- T-1.1.3: Context-Sensitive Transportation
- T-1.1.4: Transit-Oriented Development

T-2.2 Making Multimodal Connections

- T-2.2.2: Connecting District Neighborhoods

T-2.3 Bicycle Access, Facilities, and Safety

- T-2.3.1: Better Integration of Bicycle and Pedestrian Planning

T-2.4 Pedestrian Access, Facilities, and Safety

- T-2.4.1: Pedestrian Network
- T-2.4.2: Pedestrian Safety

F. Environmental Protection Element

The University's plan to adaptively reuse and renovate a significant portion of the MLC structure rather than demolish it advances several environmental policies. By incorporating sustainable landscaping practices and green spaces, the project aligns with **Policy E-1.1.2** by mitigating the urban heat island effect through tree planting, expanded green space, and green roofs, benefiting heat-vulnerable residents. The emphasis on native plantings and stormwater management supports **Policy E-2.1.3**, enhancing the campus environment while reducing runoff and creating a stronger sense of place.

Additionally, the adaptive reuse of the structure and use of permeable materials align with **Policy E-4.1.1**, helping to absorb stormwater and reduce runoff. Landscaping improvements and the potential use of green roofs further advance **Policy E-4.1.2** by promoting tree planting and vegetated spaces to reduce stormwater runoff and mitigate heat island effects. These adaptive reuse efforts reflect the University's commitment to sustainable development, benefiting both the campus and surrounding community by prioritizing environmental resilience and quality in its designs.

The University's plan to adaptively reuse and renovate the MLC structure significantly advances environmental equity by incorporating sustainable landscaping and green space practices that directly benefit heat-vulnerable residents, particularly those from marginalized communities. Overall, these efforts reflect the University's commitment to sustainable development, prioritizing environmental resilience and quality, and benefiting both the campus and surrounding community, particularly those disproportionately affected by climate-related challenges.

Accordingly, the proposed campus plan amendment and further processing is not inconsistent with the Environmental Protection Element and advances the specific policies listed below:

E-1.1 Preparing for and Responding to Natural Hazards

- E-1.1.2: Urban Heat Island Mitigation

E-2.1 Conserving and Expanding Washington, DC's Urban Forests

- E-2.1.3: Sustainable Landscaping Practices

E-4.1 Green Infrastructure GI

- E-4.1.1: Maximizing Permeable Surfaces
- E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff

E-7.1 Greening the Government

- E-7.1.3: Sustainable Landscaping

G. Economic Development Element

The University's plan to renovate and repurpose the MLC advances **Policy ED-2.4.1** by supporting institutional growth in higher education. The renovation enhances the University's educational and cultural amenities, making the campus more attractive and accessible to students, faculty, and the broader community. This growth can create employment and income opportunities for District residents, both during the renovation process through the creation of construction jobs, and through long-term academic and operational expansion. Additionally, the upgraded facilities, strengthen Gallaudet's role as a cultural and educational hub, contributing to the District's diverse offerings in these sectors.

Accordingly, the proposed campus plan amendment and further processing is not inconsistent with the Economic Development Element and advances the specific policy listed below:

ED-2.4 The Institutional Economy

- ED-2.4.1: Institutional Growth

H. Educational Facilities Element

Through a racial equity lens, the University's reuse and redevelopment of the MLC advances **Policy EDU-3.2.2** by promoting corporate citizenship in ways that enhance accessibility and inclusivity for students. The commitment to high-quality architecture, sustainable building methods, and adaptive reuse ensures that all students, particularly those from historically marginalized communities, benefit from an improved campus environment that supports their academic success. In line with **Policy EDU-3.3.2**, the renovation fosters a balance between university growth and student needs, ensuring that the development enhances the student experience without compromising the character or quality of life on campus. This focus on creating an accessible, sustainable, and equitable learning environment contributes to a more inclusive atmosphere for all students.

Accordingly, the proposed campus plan amendment and further processing is not inconsistent with the Educational Facilities Element and advances the specific policies listed below:

EDU-3.2 Educational Partnerships

- EDU-3.2.2: Corporate Citizenship

EDU-3.3 Colleges, Universities, and Neighborhoods

- EDU-3.3.2: Balancing University Growth and Neighborhood Needs

III. Part Two: Gallaudet's Community Outreach and Engagement

As required by Part Two of the Racial Equity Tool, the University has conducted outreach to the affected Advisory Neighborhood Commissions ("ANC") and to property owners surrounding the campus.

In addition to proactive engagement, Part Two of the Racial Equity Tool also requires the University to consider the affected community and address various questions as they pertain to the proposed zoning action, to the extent possible. The University's responses are provided below.

A. Community(ies)

The Congress for the New Urbanism ("CNU") defines a "community" as "a group of people living in the same place or having a particular characteristic in common." Many places have different communities inhabiting them, such as elderly, or arts, or ethnic community living and/or working in close proximity to one another. Even the internet can be considered a place inhabited by many diverse communities. The scale, parameters, and character of a community-scaled planning effort can be difficult to define. See [CNU.org](https://www.cnu.org), Public Square.

What community is impacted by the zoning action?

The community impacted by Gallaudet's campus plan amendment includes not only students, faculty, and university employees but also the surrounding neighborhood. While the renovated MLC will primarily serve those on campus, improvements to facilities, landscaping, and infrastructure will also benefit nearby residents by enhancing the campus's accessibility and aesthetics. These changes are expected to foster stronger connections between the university and the neighborhood, as the University remains an integrated part of the broader community. There is precedent for considering the surrounding neighborhood as part of the impacted community, particularly when campus developments contribute to local vibrancy and neighborhood connectivity.

What specific factors define the impacted community?

The Comp Plan identifies several factors that define the Gallaudet community:

- **Mission and History**: Gallaudet University is the world's premier institution for deaf and hard of hearing students, with a rich history dating back to 1864. It is the only university in the world where all programs and services are specifically designed to accommodate deaf and hard of hearing individuals. See <https://gallaudet.edu/>.
- **Bilingual Education**: The University is renowned for its bilingual approach, using both American Sign Language (ASL) and written English as primary languages of instruction, fostering a unique learning environment. See <https://gallaudet.edu/>.
- **Cultural Significance**: Gallaudet is a cultural hub for the deaf community, playing a central role in promoting deaf culture, advocacy, and awareness. It has a vibrant Deaf community both on campus and globally. See <https://gallaudet.edu/>.
- **Diversity and Inclusion**: Gallaudet emphasizes diversity, equity, and inclusion, not only focusing on the needs of deaf and hard of hearing individuals but also fostering a broader commitment to racial equity, gender equality, and accessibility. See <https://gallaudet.edu/>.
- **Research and Innovation**: Gallaudet is a leader in research related to deaf studies, ASL linguistics, deaf education, and related fields. Its research initiatives contribute significantly to advancing knowledge and best practices for the deaf community. See <https://gallaudet.edu/>.

Who would potentially be burdened as a result of the zoning action?

Those who may experience short-term burdens due to the campus plan amendment include students, faculty, and University employees, who could be affected by construction-related truck traffic and noise. These effects could extend to nearby residents, especially those living closest to the campus boundaries. However, mitigation measures, such as limited construction hours, designated truck routes, and noise barriers, will be implemented to minimize disruptions for both the campus and surrounding community, helping to balance the short-term impacts with the long-term benefits of the project.

Within the community, who would potentially benefit as a result of the zoning action?

Students, particularly those who are deaf or hard of hearing, would gain enhanced access to upgraded facilities and resources, improving their educational experience. Faculty and staff would also benefit from improved teaching and learning environments, fostering collaboration and enhancing workplace conditions. Further, the MLC renovation includes a new home for the University's unparalleled archives, which will benefit students and faculty as well as interested researchers and members of the public.

Past and Present Racial Discrimination / Harm to Community

Are there negative conditions in the community that are the result of past or present discrimination?

The [Ward 5 Heritage Guide](#) ("Guide") is intended to identify historic or culturally important places in Ward 5 and to provide a framework for developing strategies necessary to capitalize on, and if necessary, protect these historic resources. The Guide's historical perspective presents several negative conditions in the Ward 5 communities that are the result of past or present discrimination:

- **Historical Segregation**: Many of the early public schools in the area were segregated, with separate schools for white and African American students. This segregation extended to other institutions and facilities, contributing to a legacy of inequality and limited access to resources for minority communities. *See Guide*, p. 15.
- **Displacement and Gentrification**: Urban development and gentrification on historically marginalized communities has had a negative impact on the University's community. As new developments and investments come into the area, long-time residents, including those in the Gallaudet community, may face displacement due to rising property values and living costs. *See Guide*, p. 20.
- **Economic Disparities**: Economic disparities have persisted over time, affecting access to quality housing, education, and employment opportunities. These disparities are often rooted in historical discrimination and continue to impact the community today. *See Guide*, p. 20.

Are there current efforts or ongoing efforts in the community that are addressing past discrimination described above?

The District government has established programs intended to address past discrimination perpetuated by redlining. The Black Homeownership Strike Force ("BHSF") acknowledges that D.C.'s history of redlining and racist real estate practices blocked Black households from attaining the "American Dream." [Black Homeownership Strike Force](#), p.5. The patterns established by redlining decades ago are visible today, as Black households are concentrated in the eastern wards of the city, particularly to the east of the Anacostia River. *Id.* at 7. The BHSF establishes a goal of gaining 20,000 net new Black homeowners by 2030 by implementing the following recommendations:

- Provide estate planning resources and legal services to assist with the transfer of ownership to homeowners and their heirs.
- Pass legislation to protect homeowners from unwanted solicitation regarding the sale or potential purchase of their homes.
- Establish a Homeowner Assistance Fund to aid Black homeowners at risk of foreclosure due to their inability to pay their mortgage and related housing fees.
- Provide homeownership units to Black owner occupant homebuyers with a mixed income requirement with an average income restriction of 80 percent MFI.
- Leverage the \$10 million Black Homeownership Fund to create a public-private fund where 1/3 of the units are affordable, 1/3 of the units are market rate and sold to Black owner-occupant homebuyers.
- Broaden awareness of programs to support homeownership.
- Increase the effectiveness of all homeownership programs to increase the ability of Black homebuyers using District programs to compete for homes in the current market.

The District's [Upward Mobility Action Plan](#) ("UMAP") also addresses disparities long entrenched through discriminatory policies, such as redlining and segregation and exacerbated by the COVID 19 pandemic. The UMAP introduces an approach to boosting mobility from poverty in the District by aligning systems and programs for housing, financial wellbeing, and workforce development / adult education. *See Id.* at IV. In particular, community-based organizations that partnered with the District in this effort noted that homeownership remains the strongest pathway to prosperity. *See Id.* at II. The UMAP recommends a systemic approach to boost upward mobility by 1) improving residents experience of District programs; 2) aligning programs that help residents achieve stability and then mobility toward prosperity; 3) measuring progress for upward mobility; and 4) evaluating program effectiveness to improve resident outcomes. *See Id.* at 19–21.

These efforts work in combination with other existing programs within the District that provide resources for housing, including the IZ Affordable Housing Lottery, Home Purchase Assistance Program, Housing Choice Voucher Program, Foreclosure Prevention Resources, Employer Assisted Housing Program, Tenant Opportunity to Purchase Act, District Opportunity to Purchase Act, Public Housing, and Housing Assistance Payment Program, among others available through [Housing DC](#).

More specific to the University, there are efforts underway to revitalize the community.

- **Louise B. Miller Memorial**: Louise B. Miller was a pivotal advocate for Black deaf children's education, known for her 1952 lawsuit against the D.C. Board of Education after her son Kenneth was denied admission to the Kendall School due to segregation. Her victory in this case helped end the forced relocation of Black deaf children outside D.C. and set a precedent that influenced *Brown v. Board of Education*. Her legacy will be honored with the Louise B. Miller Pathways and Gardens memorial at Gallaudet. The memorial was approved as part of a campus plan amendment in 2023 (Zoning Commission Case No. 12-15C).

- **Preservation and Recognition:** Efforts to recognize and preserve cultural and historical resources in the Gallaudet community, including identifying and protecting sites of historical significance. *See* Guide, p. 28-63.
- **Community Engagement:** Initiatives to engage the community in preservation efforts, such as the DC Community Heritage Project, which encourages residents to explore and document the history of their neighborhoods. *See* Guide, p. 30-31.

The University will continue to work with the community to identify any additional ongoing efforts in the community intended to address past discrimination or current challenges due to past discrimination.

B. Community Participation / Outreach Efforts

The planning and development policies for the Upper Northeast Area Element derive from large Comp Plan workshops that took place in the Planning Area during the 2006 Comp Plan revision. These meetings provided an opportunity for residents to discuss neighborhood planning issues, as well as District-wide issues. Additional meetings were held on planning topics not directly connected to the Comp Plan, including the public realm and transportation improvements. *See* 10A DCMR § 2007.2.

The community identified the following priorities during these meetings:

- The unique character that defines Upper Northeast neighborhoods should be preserved as infill development takes place.
- Housing opportunities should be increased for people at all income levels so that Upper Northeast can remain a diverse neighborhood. The District-wide rise in housing prices has particularly impacted Upper Northeast, as costs have soared beyond what many local residents can afford. Moderate-income families and lower-income residents are being priced out of the area, and there are concerns that the community is becoming affordable only to persons with high incomes.
- New condominiums, apartments, and commercial development should be directed to the areas that are best able to handle increased density, namely areas immediately adjacent to Metrorail stations or along high-volume transit corridors.
- Upper Northeast neighborhoods have lived with the heavy truck traffic, noise, and unappealing views that comes with industrial land uses for decades. This is particularly true in Ivy City, Langdon, Brentwood, and the 7th-8th Street NE area southwest of the Brookland Metro station. Residents are especially concerned about large trucks, vibration, dust, air pollution, and the transport of hazardous materials on the railroads. There is also a desire to clean up brownfield sites in the community and return them to productive use. These sites present an opportunity to implement green infrastructure, helping to mitigate pollution, improve public health, and create accessible green spaces.

See 10-A DCMR § 2407.3.

What unique factors about the affected community and/or communities influenced your outreach plan / efforts?

Gallaudet is a premier institution for the education of deaf and hard-of-hearing individuals. Outreach efforts should be sensitive to and inclusive of Deaf culture and American Sign Language (ASL). This includes providing ASL interpreters, captioning, and other accessibility services during events and communications.

How were your outreach efforts proactive in terms of meeting community needs and circumstances?

The University sent the Notice of Intent to property owners located within 200 feet of the Property and the ANC's on July 9, 2024.

What was the overall timeframe and frequency of your outreach?

The University has engaged with the community as provided in the following table:

Engagement	Date	Result
Notice of Intent sent to property owners within 200 feet of the Property and the ANC's	July 9, 2024	--
Meeting with ANC 5D Zoning And Development Committee	September 19, 2024	
Meeting with ANC 5D Committee of the Whole	October 22, 2024	

C. Community Priorities and Impact on Zoning Action

Has the community identified negative outcomes that could result from the zoning action, i.e. specific things the community doesn't want to change/happen as a result of the zoning action?

The community has not identified negative outcomes that could result from the zoning action.

The University will continue to work with the community and address concerns as they arise, including impact mitigation.

Has the community identified positive outcomes that could result from the zoning action, i.e. specific things the community wants to change as a result of the zoning action?

The community has responded favorably in the discussions to-date related to the zoning action. The University will continue to work with the community to identify positive outcomes.

Will members of the community be displaced (either directly or indirectly) as a result of the zoning action?

There will be no permanent displacement of any residents as a result of the zoning action, as the existing structure is not occupied by commercial tenants or residents.

Did community outreach inform/change your zoning action? If so, how does it incorporate or respond directly to the community input received?

Community outreach has not impacted the proposal.

If the zoning action could potentially create negative outcomes, how will they be mitigated?

Any potential negative outcomes can be mitigated by initiating a plan that includes the following components:

- **Community Engagement**: Engage with the Gallaudet community and other stakeholders early in the planning process. This includes holding public meetings, conducting surveys, and creating forums for feedback. Understanding the concerns and needs of the community can help in addressing potential issues before they arise.
- **Environmental Considerations**: Ensure that the renovation project adheres to environmental regulations and best practices. This includes minimizing noise, dust, and other pollutants during construction. Implementing green building practices can also help in reducing the environmental footprint of the renovation.
- **Accessibility**: Make sure that the renovated MLC is fully accessible to all individuals, including those with disabilities. This includes providing ramps, elevators, and other necessary accommodations to ensure that everyone can use the facility comfortably.
- **Communication**: Maintain clear and consistent communication with the community throughout the renovation process. This includes providing regular updates on the progress of the project, any changes to the timeline, and how potential disruptions will be managed.
- **Safety Measures**: Implement strict safety protocols to protect both the construction workers and the community. This includes securing the construction site, providing proper signage, and ensuring that all safety regulations are followed.

What input from the community was shared but not incorporated into the zoning action? Why?

The community has not yet provided input to incorporate into the zoning action.

IV. Part Three: Disaggregated Data Regarding Race and Ethnicity

The Zoning Commission expects disaggregated race and ethnicity data from the **Office of Planning** in every racial equity analysis submission that analyzes a zoning action through a racial equity lens. The University will provide any additional information as requested by the Zoning Commission.

V. Part Four: Zoning Commission Evaluation

Part Four of the Zoning Commission's Racial Equity Tool provides the criteria with which the Zoning Commission shall evaluate a proposed action through a racial equity lens. This evaluation is guided by the following questions:

- *What Comprehensive Plan policies related to racial equity will potentially be advanced by approval of the zoning action?*
- *What Comprehensive Plan policies related to racial equity will potentially not be advanced by approval of the zoning action?*
- *When considering the following themes/questions based on Comprehensive Plan policies related to racial equity, what are the anticipated positive and negative impacts and/or outcomes of the zoning action?*

The table below indicates how the proposed campus plan amendment will generally result in positive outcomes when considered through several racial equity themes, as it has the potential to address a number of equity issues that residents in the Upper Northeast Planning Area are experiencing. Throughout the processing of this Application, the University will continue engaging with the affected ANC's and community.

Evaluation of Equitable Development Indicators		
Indicator	Measure	Outcome / Applicable Public Benefit
Displacement		
Physical	<ul style="list-style-type: none">• Displacement due to redevelopment.	<ul style="list-style-type: none">• Displacement will not occur on the Property because the MLC will be renovated and reopened for student, faculty, and university employee use.
Economic	<ul style="list-style-type: none">• Displacement due to housing cost increases.	<ul style="list-style-type: none">• There would be no displacement due to housing costs, as the library would be located centrally on campus and is unlikely to impact housing values in adjacent neighborhoods.
Cultural	<ul style="list-style-type: none">• Loss of sense of belonging or shared identity in neighborhood.	<ul style="list-style-type: none">• The archive, studios, lecture halls, and collaborative spaces located within the building will connect the Gallaudet community with its past, provide a common ground where individuals of diverse backgrounds can come together, and strengthen the

		community’s identity by enhancing pride in resources.
Housing	<ul style="list-style-type: none">· Number of new market rate and dedicated affordable units (per 2019 Housing Equity Report).	<ul style="list-style-type: none">· The proposed renovation would not result in housing on the campus.
Housing Burden	<ul style="list-style-type: none">· Households that pay more than 30% of income (burdened), or 50% of income (severely burdened) on housing.	
Family-sized Units	<ul style="list-style-type: none">· Dwelling units with 3 or more bedrooms.	
Transportation		
Access to Transit	<ul style="list-style-type: none">· 0.5 miles to Metrorail.· 0.25 miles to priority bus corridors and other modes of public transportation.	<ul style="list-style-type: none">· Located 0.5 miles from the NoMa-Gallaudet U New York Avenue Metrorail station, which serves the Red Line.· The Property has access to Metrobus routes 90 and 92 from Florida Avenue.
Transportation Improvements / Pedestrian Safety	<ul style="list-style-type: none">· Gaps in pedestrian network.· Lack of pedestrian facilities (crosswalks, lighting, seating, etc.).	<ul style="list-style-type: none">· The renovation of the MLC and proposed landscaping will strengthen pedestrian connections in the central campus area, further the University’s efforts to reestablish the Gallaudet Mall, providing places for respite and recreation.
Employment		
New Jobs	<ul style="list-style-type: none">· Establishment of new businesses· Mixed use developments that include offices, restaurants, retail, or other uses.· Construction of new development.	<ul style="list-style-type: none">· The renovation of the MLC is anticipated to create new construction-related opportunities for employment.· The MLC is a resource that will provide indirect support for employment, including use of community programs, resource center, or providing access to educational resources that can increase knowledge and skills needed for employment.
Access to Jobs	<ul style="list-style-type: none">· Proximity to public transit.· Reduced commute times.· Walkability and bikeability.	<ul style="list-style-type: none">· Property is in close proximity to public transit, including Metro station and multiple bus lines,

	<ul style="list-style-type: none"> · Affordable housing near Employment Centers. · Internet Access · Access to childcare 	providing access to employment areas throughout the region.
Community		
Education / Health / Wellness	<ul style="list-style-type: none"> · Access to quality public services. · Access to safe, clean public gathering spaces, open spaces, and recreation. · Healthy natural environment. 	<ul style="list-style-type: none"> · The Gallaudet community will continue to have access to university resources that include gathering spaces, open spaces, and recreation. · The University is in proximity to neighborhood services, retail, and eating and drinking establishments in the Union Market neighborhood to the west.
Environmental	<ul style="list-style-type: none"> · Reuse of significant portion of existing structure. · Use of renewable energy sources. · Storm water management. · 	<ul style="list-style-type: none"> · New landscape will improve stormwater infrastructure and include climate resiliency features, such as new shade structures. · Adaptive reuse of existing building to provide additional resources to the Gallaudet community.
Access to Amenities	<ul style="list-style-type: none"> · Availability of building amenities. · Proximity/availability of uses that meet day-to-day needs (grocery, retail, service, eating and drinking). 	<ul style="list-style-type: none"> · Gallaudet community will have access to renovated MLC and other campus amenities. · Access to Union Market for neighborhood services that include grocery, retail, service, eating and drinking.

VI. Conclusion

In light of the foregoing analysis, the University submits that the proposed campus plan amendment and further processing will advance numerous Comprehensive Plan policies related to racial equity. Specifically, the amendment will facilitate the innovative renovation of the Merrill Learning Center, a vital resource for the Gallaudet community, enhancing equity through improved access and inclusive programming. Furthermore, the campus plan amendment aligns with the FLUM and GPM designations, and it will promote several key Comp Plan policies, ensuring consistency with broader land use goals.