

EXHIBIT F

**Evaluation of Consistency with the District Elements of the
Comprehensive Plan with Racial Equity Analysis**

submitted in accordance with Subtitle X § 101.11 and Subtitle Z § 302.10(m)

I. Introduction

This *Evaluation of Consistency with the District Elements of the Comprehensive Plan with Racial Equity Analysis* (the “**Comp Plan Evaluation**”) is provided in support of an application for further processing of the Howard University 2020-2030 Central Campus Plan (the “**Campus Plan**”). As explained in the Applicant’s *Statement in Support*, the further processing application (the “**Application**”) seeks the Zoning Commission’s approval to redevelop the Wonder Plaza site located at 2301 Georgia Avenue, NW (Lot 44 in Square 3064) (the “**Property**”). As the development partner for Howard University (“**Howard**”), the Applicant proposes to redevelop the Property with a new, state-of-the art mixed use building that the Campus Plan identifies as the Fusion Building. The project will consist of approximately 315,040 square feet of gross floor area and provide approximately 280 student housing units (592 beds), ground floor retail, a student dining hall and a new, comprehensive wellness center (the “**Project**”).

Subtitle X § 101.11 provides the following:

In reviewing and deciding a campus plan application or new building construction pursuant to a campus plan, the Zoning Commission shall consider, to the extent they are relevant, the policies of the District Elements of the Comprehensive Plan.

(Emphasis added.)

The District Elements of the Comprehensive Plan include the Citywide Elements and the Area Elements. 10-A DCMR § 103.4.

In addition, Subtitle Z § 302.10(m) requires that the Applicant provide “[a] racial equity analysis relative to the Comprehensive Plan in compliance with the Zoning Commission’s current Racial Equity Tool.” The Racial Equity Tool is currently organized as a four-part analysis, the first of which requires a discussion of the District Elements.¹ **Accordingly, Section IV below includes the information required by Subtitle X § 101.11 and part one of the Racial Equity Tool.**

As detailed herein, the Applicant’s further processing application is not inconsistent with the relevant policies of the District Elements and would lead to favorable outcomes when evaluated through a racial equity lens. To the extent the application is inconsistent with any policies, such inconsistencies are outweighed by the Project’s consistency with several policies under the Citywide Elements and the applicable Small Area Plan.

¹ Available at: <https://dcoz.dc.gov/release/zc-racial-equity-analysis-tool-new>.

II. Relevance of Comprehensive Plan Analysis Provided for Approved Campus Plan and Zoning Commission Case No. 24-01

Pursuant to Z.C. Order No. 20-08, effective April 8, 2022, the Zoning Commission (hereinafter the “**Commission**”) approved the Campus Plan. The Campus Plan includes relevant excerpts and policies from the Comprehensive Plan that are particularly advanced by the Howard’s master plan. *See* Campus Plan at pp. 47-55. In the final order approving the Campus Plan, the Commission credited testimony from the Office of Planning regarding the Campus Plan’s consistency with the Comprehensive Plan. The Commission ultimately concluded that the Campus Plan “will further applicable policies of Elements of the Comprehensive Plan.” *See* Z.C. Order No. 20-08, Finding of Fact No. 18 and Conclusion of Law No. 2.

As explained in the Applicant’s *Statement in Support*, the further processing application and the feasibility of the Project are contingent upon the Commission’s approval of the map amendment petition currently being processed as Z.C. Case No. 24-01, which proposes to rezone the Property to the MU-10 zone. In support of the rezoning request, Howard has submitted extensive filings analyzing the proposed rezoning and consistency with the Comprehensive Plan. *See* Public Record for Z.C. Case No. 24-01, Ex. [3E](#), [14B](#).

Given their relevance, the Comprehensive Plan analyses that were submitted for the Campus Plan and for the proposed rezoning in Z.C. Case No. 24-01 have informed this Comp Plan Evaluation.

III. Racial Equity Lens

A primary focus of the Comprehensive Plan, as reflected throughout its various policies, is achieving racial equity. The Framework Element of the Comprehensive Plan defines racial equity as the moment when “race can no longer be used to predict life outcomes and outcomes for all groups are improved.” 10-A DCMR § 213.7. Overall, livability, equity, and safety are considered to be the most critical values of the District’s residents. 10-A DCMR §§ 107.17–107.22. To help guide the Commission in applying a racial equity lens when reviewing zoning actions, the Implementation Element reads, in relevant part, “[a]long with consideration of the defining language on equity and racial equity in the Framework Element, guidance in the citywide Elements on District-wide equity objectives, and the Area Elements should be used as a tool to help guide equity interests and needs of different areas in the District.” 10-A DCMR § 2501.6. The current Racial Equity Tool applies this guidance.

The sections below enable the Commission to evaluate the requested further processing of the Campus Plan through a racial equity lens and determine whether the proposal is not inconsistent with the Comprehensive Plan as a whole.

IV. District Elements (Subtitle X § 101.11; Part One of the Racial Equity Tool)

The Commission “shall consider, to the extent they are relevant, the policies of the District Elements of the Comprehensive Plan” when reviewing an application for further processing of an

approved campus plan. 11-X DCMR § 101.11 The purposes of the District Elements of the Comprehensive Plan of the National Capital are stated as follows:

The purposes of the District elements of the Comprehensive Plan for the National Capital are to: (1) Define the requirements and aspirations of District residents, and accordingly influence social, economic, and physical development; (2) Guide executive and legislative decisions on matters affecting the District and its citizens; (3) Promote economic growth and jobs for District residents; (4) Guide private and public development in order to achieve District and community goals; (5) Maintain and enhance the natural and architectural assets of the District; and (6) Assist in the conservation, stabilization, and improvement of each neighborhood and community in the District. This further processing application is consistent with Comprehensive Plan policies in support of institutional uses within the Land Use Element of the Comprehensive Plan.

[DC Code § 1-306.01(b).]

A. Framework Element

The Framework Element, which provides the foundation for the rest of the Comprehensive Plan, contains the Comprehensive Plan's Generalized Policy Map ("**GPM**") and the Future Land Use Map ("**FLUM**"). The GPM "tells the story" of how the District is expected to change and highlights the places where much of the city's future growth and change is expected to occur. The FLUM shows the general character and distribution of recommended and planned uses across the city. Both maps carry the same legal weight as the text of the Comprehensive Plan. 10-A DCMR §§ 200.5 and 200.6.

On the GPM, the Property is designated as a **Main Street Mixed Use Corridor**. According to the Framework Element, "[t]hese are traditional commercial business corridors with a concentration of older storefronts along the street. ... Their common feature is that they have a pedestrian-oriented environment with traditional storefronts. ... Some corridors are underutilized, with capacity for redevelopment. Conservation and enhancement of these corridors is desired to foster economic and housing opportunities that serve neighborhood needs. Any development or redevelopment that occurs should support transit use and enhance the pedestrian environment." 10-A DCMR § 225.14.

On the FLUM, the Property is designated as **Mixed Use (Medium Density Residential / Medium Density Commercial / Institutional)**. According to the Framework Element, a "Mixed Use" designation is not intended to be interpreted according to its individual land use designations. Rather "Mixed Use" is a specific land use designation unto itself that indicates areas where the mixing of two or more land uses is especially encouraged. It is generally assigned to established, pedestrian-oriented commercial areas that also include substantial amounts of housing, typically on the upper stories of buildings with ground-floor retail or office uses, and commercial corridors or districts that may not contain substantial amounts of housing but where more housing is desired

in the future. Typically, the general density and intensity of development within a given Mixed Use area is determined by the specific mix of uses shown on the FLUM. If the desired outcome is to emphasize one use over the other, the FLUM may note the preferred use by showing it at a slightly higher density than the other use in the mix. The Comprehensive Plan Area Elements, in this case, the Mid-City Area Element, may also provide detail on the specific mix of uses envisioned. 10-A DCMR §§ 227.20 and 227.21.

Framework Element Evaluation

The Applicant's proposal is not inconsistent with the Property's designation on the GPM. Consistent with the vision for a Main Street Mixed Use Corridor, the Project will "foster economic and housing opportunities" that serve Howard and "enhance the pedestrian environment." 10-A DCMR § 225.14. By including ground floor retail, student housing, and collegiate-type uses such as a dining hall and gymnasium, the project will generate the precise mix of activities that are envisioned along the Georgia Avenue corridor.

The Applicant's proposal is also not inconsistent with the Property's Mixed Use FLUM destination, because it integrates a mix of residential, retail, and recreational uses that is consistent with the "general density and intensity of development... determined by the mix of uses shown on the FLUM." 10-A DCMR § 227.21. The Applicant proposes an overall density of 4.52 floor area ratio ("FAR") for the project, which falls right in line with the 4.0–6.0 FAR range prescribed for the Medium Density Commercial FLUM use category. 10-A DCMR § 227.12.

B. Land Use Element

The Land Use Element is the cornerstone of the Comprehensive Plan. It establishes the basic policies guiding the physical form of the District, and provides direction on a range of development, preservation, and land use computability issues. The element describes the range of considerations involved in accommodating an array of land uses within Washington, D.C. 10-A DCMR § 300.1. Through its policies and actions, the Land Use Element addresses the numerous, challenging land use issues that are present in the District, including, among others:

- Providing adequate housing, particularly affordable housing;
- Enhancing neighborhood commercial districts and centers;
- Balancing competing demands for finite land resources;
- Directing growth and new development to achieve economic vitality and creating jobs while minimizing adverse impacts on residential areas and open spaces;
- Promoting transit-accessible, sustainable development; and
- Siting challenging land uses.

10-A DCMR § 300.2.

More than any other part of the Comprehensive Plan, this element lays out the policies through which growth and change occur, while conserving and enhancing neighborhoods, commercial districts, and other areas. The Land Use Element integrates and balances competing

policies of all the other District Elements and should be given greater weight than other elements and should be given greater weight than other elements. 10-A DCMR § 300.3.

Land Use Element Evaluation

The Application will help achieve the above-described goals through its consistency with several policies under the Land Use Element. The project will redevelop an underutilized, transit-oriented site and will help improve the vitality of the lower Georgia Avenue, NW corridor. This revitalization contributes to racial equity by supporting the local economy and promoting equitable access to resources for all community members, particularly those from marginalized backgrounds. The proposed mix of uses for the Project also advances important goals related to enhancing neighborhoods with compatible development, fostering a sense of belonging and inclusivity.

Pertinent to this Application, the Land Use Element also includes several policies related to institutional uses. *See* 10-A DCMR §§ 317.1 – 317.9. These policies recognize the importance of institutional uses, such as Howard, to the economy, character, history, and future of the District. These policies are also designed to ensure that institutional uses in a residential neighborhood are planned and operated in a manner that is sensitive to neighborhood issues and are operated in a manner which maintains the existing quality of life. 10-A DCMR § 312.7 (Policy LU-2.3.5: Institutional Uses). Howard has successfully contributed to the quality and character of the urban residential neighborhoods bordering the main campus for over 150 years. The Project will elevate Howard's presence and provide a level activity envisioned by the approved Campus Plan. Furthermore, the proposed plans for the Project reflect Howard's continued commitment to high-quality architecture and design on its central campus and expanding its use of green building methods. 10-A DCMR § 317.8 (Policy LU-3.3.2: Corporate Citizenship).

The Project advances the District's racial equity objectives by revitalizing an underutilized, transit-oriented site along the lower Georgia Avenue, NW corridor, which has historically faced economic and social challenges. By enhancing the vitality of this area, the project supports the local economy and promotes equitable access to resources for all community members, particularly those from marginalized backgrounds. The proposed mix of uses for the Project aligns with goals for compatible development, fostering a sense of belonging and inclusivity in the neighborhood.

Upon evaluation of the Land Use Element policies and actions, the Applicant finds that the Application is not inconsistent with the Comp Plan, and specifically with those policies listed below.

LU-1.4 Transit-Oriented Development

- Policy LU-1.4.2: Development Around Metrorail Stations
- Policy LU-1.4.5: Design to Encourage Transit Use
- Policy LU-1.4.6: Development Along Corridors
- Policy LU-1.4.7: Parking Near Metro Stations
- Policy LU-1.4.10: Co-location of Private and Public Facilities

LU-2.1 A District of Neighborhoods

- Policy LU-2.1.1.1: Variety of Neighborhood Types
- Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods
- Policy LU-2.1.4: Rehabilitation Before Demolition
- Policy LU-2.1.11: Residential Parking Requirements

LU-2.2 Maintaining Community Standards

- Policy LU-2.2.4: Neighborhood Beautification
- Policy LU-2.2.7: Alley Use

LU-2.3 Residential Land Use Compatibility

- Policy LU-2.3.1: Managing Non-Residential Uses in Residential Areas
- Policy LU-2.3.5: Institutional Uses

LU-2.4 Neighborhood Commercial Districts and Centers

- Policy LU-2.4.1: Promotion of Commercial Centers
- Policy LU-2.4.5: Encouraging Nodal Development
- Policy LU-2.4.6: Scale and Design of New Commercial Uses

LU-3.3 Institutional Uses

- Policy LU-3.3.1: Transportation Impacts of Institutional Uses
- Policy LU-3.3.2: Corporate Citizenship

C. Transportation Element

The Transportation Element provides policies and actions that are devoted to maintaining and improving the District’s transportation system and enhancing the travel choices available to District residents, visitors, and workers. These transportation-related policies are integrally related to other Comprehensive Plan policies that address land use, urban design, and environmental protection. The close interplay between these policy areas is necessary to improving safety, mobility, and accessibility in the District. 10-A DCMR § 400.1.

The overarching goal for transportation in the District is to “[c]reate a safe, sustainable, equitable, efficient, and multimodal transportation system that meets the access and mobility needs of District residents, the regional workforce, and visitors; supports local and regional economic prosperity; and enhance the quality of life for District residents.” 10-A DCMR § 401.1.

Transportation Element Evaluation

The further processing application advances many policies of the Transportation Element. The Project will provide a mix of residential, retail, and recreational uses at a site that can be accessed by vehicle, bicycle, and/or public transit. An underground parking garage will provide an appropriate amount of vehicle parking spaces (158), which is far less than the Campus Plan allocates for the Property. The project will also provide 106 long-term and 32 short-term bicycle

parking spaces and adequate bicycle facilities. The proposed landscaping and streetscape improvements will foster a pedestrian-oriented environment along the Georgia Avenue, NW corridor and discourage auto-orientated uses. Overall, the application will result in transportation-related improvements that leverage the Property's transit-oriented location and accommodate the transit needs for all users of the Project, including Howard's students and retail patrons.

The Project promotes racial equity by enhancing accessibility and mobility options for diverse community members. By providing a mix of residential, retail, and recreational uses in a transit-oriented location, the project supports equitable access to essential services and amenities for residents and visitors alike, particularly those from historically marginalized communities.

Additionally, the landscaping and streetscape improvements will create a pedestrian-friendly environment along the Georgia Avenue NW corridor, fostering a sense of safety and community engagement. By prioritizing bicycle and pedestrian facilities, the project accommodates the transit needs of all users, including Howard students and retail patrons. Overall, these transportation-related improvements not only enhance mobility but also contribute to a more inclusive and accessible urban environment, ultimately advancing racial equity by promoting sustainable and equitable transportation options for everyone in the community.

Upon the Applicant's evaluation of the Transportation element, the Applicant finds that the Application specifically advances those policies listed below:

T-1.1 Land Use: Transportation Coordination

- Policy T-1.1.3: Context-Sensitive Transportation
- Policy T-1.1.4: Transit-Oriented Development
- Policy T-1.1.7: Equitable Transportation Access

T-1.2 Transforming Corridors

- Policy T-1.2.1: Major Thoroughfare Improvements
- Policy T-1.2.3: Discouraging Auto-Oriented Uses

T-2.2 Making Multimodal Connections

- Policy T-2.2.2: Connecting District Neighborhoods

T-2.3 Bicycle Access, Facilities, and Safety

- Action T-2.3.B: Bicycle Facilities

T-2.4 Pedestrian Access, Facilities, and Safety

- Policy T-2.4.1: Pedestrian Network
- Policy T-2.4.2: Pedestrian Safety
- Policy T-2.5.5: Natural Landscaping

T-2.6 Addressing Accessibility for All Residents

- Policy T-2.6.1: Transportation Access

- Policy T-2.6.2: Transit Needs

D. Housing Element

The Housing Element describes the importance of housing to neighborhood quality in the District, and the importance of providing housing opportunities for all segments of the population throughout the District. 10-A DCMR § 500.1. Critical housing issues facing Washington, DC are address in the Housing Element and include ensuring housing affordability across all incomes and household sizes, fostering housing production to improve affordability, and promoting more housing proximate to transit and linking new housing to transit, among others. 10-A DCMR § 500.2. The overarching goal for housing is to provide a safe, decent, healthy, and affordable housing supply for current and future residents in all of Washington, DC's neighborhoods by maintaining and developing housing for all incomes and household types. 10-A DCMR § 501.1.

Housing Element Evaluation

The Project is not inconsistent with the Housing Element of the Comprehensive Plan. It is worth noting that the project will result in new, high-quality student housing on a Historically Black College and University (HBCU) campus. The Applicant's proposal, therefore, should help to achieve the District's racial equity objectives, and is not inconsistent with the Comprehensive Plan when evaluated through a racial equity lens.

In accordance with the vision for the Property set forth in the Campus Plan, the Project will provide 280 units to student housing (592 total beds), including: 57 four-bedroom units, 15 three-bedroom units, 111 two-bedroom units, 35 one-bedroom units, and 62 studio units. The residential component of the Applicant's proposal furthers Housing Element policies related to balanced growth and meeting a diversity of housing needs. By generating additional housing opportunities, the project affords Howard students increased opportunities to live on campus, which can be integral to the collegiate experience. And although the proposed student housing does not include any affordable housing, the added supply will likely open opportunities for other residents and families to find housing in the surrounding neighborhood. Moreover, the student housing will be constructed within the upper levels of a mixed-use building, and located at an attractive, transit-oriented destination along the Georgia Avenue, NW corridor.

The Project aligns with racial equity objectives by providing high-quality student housing on a HBCU campus, contributing to the overall mission of promoting equitable access to education. With 280 units devoted to student housing, including a variety of configurations to meet diverse needs, the project addresses the demand for on-campus living, which can enhance the collegiate experience for students, particularly those from historically underrepresented backgrounds. The increased housing supply may indirectly benefit local residents and families by alleviating some housing pressures in the surrounding neighborhood. Additionally, the building's location in a mixed-use development along a transit-oriented corridor enhances accessibility for students and the community, promoting a more inclusive environment. This approach not only supports Howard's growth but also reinforces the importance of creating equitable living conditions that foster student success and community integration.

The Applicant finds that the proposal furthers the specific goals of the Housing Element that are listed below:

H-1.1 Expanding Housing Supply

- Policy H-1.1.1: Private Sector Support
- Policy H-1.1.3: Balanced Growth
- Policy H-1.1.4: Mixed-Use Development

H-1.3 Diversity of Housing Types

- Policy H-1.3.4: Cooperatives and Co-housing
- Policy H-1.3.5: Student Housing

H-1.4 Housing and Neighborhood Revitalization

- Policy H-1.4.6: Whole Neighborhood Approach

E. Economic Development Element

The Economic Development Element addresses the future of Washington DC's economy and the creation of economic opportunity for current and future District residents. It includes strategies to sustain the District's major industries, diversify the economy, accommodate job growth, maintain small businesses and neighborhood commercial districts, and increase access to employment for District residents. 10-A DCMR § 700.1. The overarching goal for economic development in the District is to drive inclusive economic expansion and resilience by growing the economy and reducing employment disparities across race, geography, and educational attainment status. 10-A DCMR § 701.1.

Economic Development Evaluation

The Application is not inconsistent with the Economic Development Element of the Comprehensive Plan. By integrating a mix of residential, retail, and recreational uses, the Project maintains and enhances Howard's, and by extension the District's, competitive edge by offering a premier HBCU experience. The Project will serve to create a vibrant campus gateway on Georgia Avenue, complete with a mix of uses that will stimulate economic activity along the western edge of the core campus. The Project will accommodate a significant number of Howard students who can support not only the ground floor retail use(s) within the Project, but existing commercial uses along the Georgia Avenue, NW corridor. The ground floor retail use will be positioned at the southwest corner of Georgia Avenue, NW and Bryant Street, NW, and accessible to public transit. Overall, the Project will drive inclusive economic expansion on campus and within the surrounding neighborhood.

Overall, the Project serves as a catalyst for inclusive economic expansion on campus and in the surrounding neighborhood, promoting a more equitable distribution of economic benefits while enhancing the overall quality of life for all residents. This commitment to economic inclusivity supports the broader goal of fostering community resilience and empowerment, ultimately advancing racial equity in the area.

The Applicant finds that the Application furthers those policies of the Economic Development Element that are listed below:

ED-1.1 Diversifying the Economic Base

- Policy ED-1.1.1: Core Industries
- Policy ED-1.1.2: Economic Linkages
- Policy ED-1.1.6: Competitive Edge

ED-2.2 The Retail Economy

- Policy ED-2.2.1: Expanding the Retail Sector
- Policy ED-2.2.3: Neighborhood Shopping
- Policy ED-2.2.5: Business Mix
- Policy ED-2.2.9: Clustered Retail at Transit

ED-2.4 The Institutional Economy

- Policy ED-2.4.1: Institutional Growth

ED-3.1 Strengthening Retail Districts

- Policy ED-3.1.1: Neighborhood Commercial Vitality
- Policy ED-3.1.5: Leveraging Private Investment
- Policy ED-3.1.8: Neighborhood Retail District Identity and Promotion

F. Educational Facilities Element

The Educational Facilities Element addresses the location, planning, use, and design of the District's educational facilities and campuses. It includes policies and actions related to higher educational facilities, including private universities such as Howard. 10-A DCMR § 1200.1 The Element focuses on the efficient use of school property and the relationship between schools and the communities that surround them. 10-A DCMR § 1200.3.

Educational Facilities Element Evaluation

The Project aligns with the Educational Facilities Element and reflects Howard's commitment to enhancing the District's character, culture, and economy while supporting community improvement and neighborhood conservation objectives. The project is consistent with the vision outlined in the approved Campus Plan, addressing potential impacts on neighboring properties. By providing on-campus student housing, the Project is likely to alleviate pressure on the existing housing stock in adjacent neighborhoods, which often serve historically marginalized populations. Ultimately, the Project will create an epicenter of student engagement and activity along the Georgia Avenue corridor, enriching the student experience and strengthening the connection between Howard and the surrounding community, thereby contributing to a more equitable and vibrant urban environment for all residents.

EDU-3.3 Colleges, Universities, and Neighborhoods

- Policy EDU-3.3.2: Balancing University Growth and Neighborhood Needs
- Policy EDU-3.3.3: Universities as Large Landowners and Campus Plan Requirements
- Policy EDU-3.3.4: Student Housing
- Policy EDU-3.3.11: Access to Recreational, Educational, and Cultural Opportunities

G. Environmental Protection Element

The Environmental Protection Element addresses the protection, conservation, and management of Washington, DC's 's land, air, water, energy, and biological resources. The Comprehensive Plan asserts that "[g]ood environmental management and pollution prevention are essential to sustain all living things and to safeguard the welfare of future generations. 10-A DCMR § 600.1. The overarching goal for the Environmental Protection Element is to protect, restore, and enhance the natural and human-made environment in Washington, DC, taking steps to improve environmental quality and resilience, adapt to and mitigate climate change, prevent and reduce pollution, improve human health, increase access to clean and renewable energy, conserve the values and functions of Washington, DC's natural resources and ecosystems, and educate the public on ways to secure a sustainable future. 10-A DCMR § 601.1.

Environmental Protection Element Evaluation

The Applicant's proposal is not inconsistent with the Environmental Protection Element of the Comprehensive Plan. As shown in the plans submitted for the application, the Project is designed with a variety of green building measures, including bioretention areas and green roofs, that will serve to improve environmental quality and reduce adverse impacts resulting from having new construction at this location. These enhancements also address the disproportionate impact of urban development on historically marginalized communities that often face higher exposure to environmental hazards. In addition, as shown on the proposed landscape plan, the project will involve the planting of new street trees and flexible lawn spaces in an effort to maximize permeable surfaces. These elements promote better air quality and green space access, benefiting all residents, particularly those in underserved areas.

Moreover, the proposed redevelopment of the Property will be required to comply with the Green Building Act and the District's storm water management regulations and will be consistent with the Sustainable DC Plan. These efforts ensure that the project aligns with broader sustainability goals, fostering a healthier urban environment. Overall, the Project and the proposed further processing of the Campus Plan will yield environmentally friendly enhancements to the Property and the abutting streetscape that will contribute to a more equitable community by creating a greener, more resilient space that serves the needs of diverse populations.

Accordingly, the Application particularly advances those policies of the Environmental Protection Element listed below:

E-1.1 Preparing for and Responding to Natural Hazards

- Policy E-1.1.2: Urban Heat Island Mitigation

E-2 Conserving Natural and Green Areas

- Policy E-2.1.2: Tree Requirements in New Development
- Policy E-2.1.3: Sustainable Landscaping Practices

E-3 Conserving Natural Resources

- Policy E-3.2.3: Renewable Energy
- Policy E-3.2.7: Energy-Efficiency Building and Site Planning

E-4 Promoting Environmental Sustainability

- Policy E-4.1.1: Maximizing Permeable Surfaces
- Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff
- Policy E-4.2.1: Support for Green Building

H. Urban Design Element

The Urban Design Element addresses the District’s physical design and visual qualities. The element describes the ways in which different aspects of the District’s landscape, especially its buildings, streets, and open spaces, work together to define impressions of Washington, DC and its neighborhoods. 10-A DCMR § 900.1. The overarching goal for urban design in the District is to enhance the beauty, equity, and livability of Washington, DC by reinforcing its historic design legacy and the identity of its neighborhoods and centers, harmoniously integrating new construction with existing buildings and the natural environment, and improving the vitality, appearance, and function of streets and public spaces. 10-A DCMR § 901.1.

Urban Design Element Evaluation

As reflected in the plans submitted for the further processing application (Ex. A), the Project will advance many of the goals and objectives of the Urban Design Element. The Project is designed to prioritize the human experience, enable social interaction, and cultivate an engaging experience at the ground floor. The scale and massing are appropriate for the surrounding area, and two large courtyards will serve to maximize the light and air available to the building’s residents, enhancing the well-being of residents and promoting a sense of community. The design and position of the ground floor spaces, including the retail corner and the gymnasium, will foster social interaction where it desired—on the western edge of Howard’s central campus. The façade of the building itself is also engaging. The design pays homage to the former bakery that used to operate at the site, and the elevations resemble a compatible blend of historic and modern architecture, creating a space that is both familiar and modern. Furthermore, the siting of the building and the proposed circulation plan will ensure a safe experience for pedestrians, motorists, and bicyclists using the abutting streetscape, promoting equitable access to the building and the surrounding streetscape. Overall, the Project represents a compatible infill development, and its design leverages the mixed-use nature of the project to generate activity and engagement on the Georgia Avenue corridor.

Upon the Applicant’s review of the policies set forth in the Urban Design Element, the Applicant finds that the Application specifically advances those policies listed below:

UD-2.1 Streets for People

- Policy UD-2.1.1: Streetscapes that Prioritize the Human Experience
- Policy UD-2.1.2: Neighborhood Streetscapes
- Policy UD-2.1.6: Minimize Mid-Block Vehicular Curb Cuts

UD-2.2 Design for Vibrant Neighborhoods

- Policy UD-2.2.4: Transitions in Building Intensity
- Policy UD-2.2.5: Infill Development

UD-3.2 Designing the Active District

- Policy UD-3.2.1: Buildings that Enable Social Interaction
- Policy UD-3.2.2: Social and Community Meeting Spaces
- Policy UD-3.2.4: Pedestrian-Convenient Transit
- Policy UD-3.2.5: Safe and Active Public Spaces and Streets

UD-3.3 Places for Lingerin

- Policy UD-3.3.1: Neighborhood Meeting Places

UD-4.2 Designing Architecture for People

- Policy UD-4.2.1: Scale and Massing of Large Buildings
- Policy UD-4.2.2: Engaging Ground Floors
- Policy UD-4.2.3: Continuity and Consistency of Building Frontages
- Policy UD-4.2.4: Creating Engaging Facades
- Policy UD-4.2.6: Active Facades

I. Historic Preservation Element

The Historic Preservation Element guides planning for the protection, revitalization, and preservation of Washington, DC's valuable historic assets. It defines the District's role in exercising preservation leadership, promoting awareness of Washington, DC history, identifying and preserving historic resources, and ensuring compatible design in historic neighborhoods. 10-A DCMR § 1000.1. The overarching goal for historic preservation is to preserve and enhance the unique cultural heritage, beauty, and identity of Washington, DC by respecting the historic physical form of the District and the enduring value of its historic structures and places, sharing responsibility for their protection and stewardship, and perpetuating them for the benefit of the residents of the District and the nation. 10-A DCMR § 1001.1.

Historic Preservation Element Evaluation

Although the Property is not located within a Historic District, nor improved with a historic landmark, the Project's design pays homage to the former Corby Bakery building, a site that played a vital role in the community and reflects the area's rich industrial heritage and was originally constructed in 1902. The bakery was the city's largest commercial bakery, and, with its modernized baking practices, was viewed as one of the nation's "most progressive" bakeries. *See*

Campus Plan at p. 129. The proposed architecture seeks to honor the bakery's main plant located at this prime location along the Georgia Avenue corridor. As shown on the plans, the north and south ends of the Project retains and integrates the existing facade and window systems, demonstrating that the project acknowledges and respects the cultural and historical narratives of the neighborhood. The proposed design was developed and refined after consulting with the Historic Preservation Office, and effectively honors the industrial activities that formerly defined the Property. This thoughtful approach preserves the memory of a once-thriving local business, particularly for those connected to the bakery's legacy.

The Application furthers the goals of the Historic Preservation Element that are listed below:

HP-1.4 Evaluating Historic Significance

- Policy HP-1.4.1: Interpreting Significance Broadly

HP-2.5: Review of Rehabilitation and New Construction

- Policy HP-2.5.3: Compatible Development

J. Mid-City Area Element

The Property is located within the Mid-City Area Element of the Comprehensive Plan. *See* 10-A DCMR § 2000.1. The Mid-City Planning Area is comprised of approximately 3.1 square miles. *Id.* The Mid-City Planning Area is one of the most diverse parts of Washington, DC, although it is one of the smallest of the ten planning areas geographically. *See* 10-A DCMR § 2000.2. Some Mid-City neighborhoods are still facing challenging economic and social conditions, including the Georgia Avenue NW and Florida Avenue NW corridors, where some buildings continue to lie vacant. 10-A DCMR § 2000.8. Additionally, the Planning Area has a severe shortage of parkland. *Id.*

Mid-City Area Element Evaluation

This Application advances a number of major planning goals and objectives of the Mid-City Area Element while promoting racial equity in the community. The proposed redevelopment will enhance both the residential character and economic vitality of the surrounding area, particularly benefiting historically marginalized populations. The mix of residential, retail, and recreational uses is designed to generate desirable activity and foster community interaction at a prime location along the Georgia Avenue NW corridor, strengthening connections between Howard and its surrounding neighborhoods.

The Project will enhance pedestrian and bicycle connections, providing safe and well-connected paths that foster a walkable experience along an active mixed-use corridor. By including bike storage space and an underground parking garage, the Project supports a multi-modal transportation system, which is essential for all community members, particularly those who rely on public transit and active transportation options. This thoughtful approach minimizes traffic congestion, making the area more accessible and inclusive for everyone. As discussed above in

relation to the Environmental Protection Element, the new development will also improve stormwater infrastructure and include other greening interventions, such as street trees, green roofs, pervious surfaces, and bioretention areas.

With its engaging design and mix of uses, the Project will help to strengthen the connection between Howard and the surrounding area, fostering an inclusive atmosphere where diverse populations can interact and thrive. The proposed redevelopment aligns with the stated action of the Georgia Avenue Corridor Policy Focus Area to develop a new mixed-use neighborhood center on the west side of Howard's central campus (Action MC-2.1.C). In doing so, the further processing application will not only provide new opportunities for Howard students but could also stimulate additional mixed-use projects envisioned for this area, creating a more equitable and vibrant community.

Overall, the Project addresses many of the residential priorities and economic objectives of the Mid-City Planning Area, contributing to a more inclusive environment that uplifts historically marginalized voices and promotes equitable access to resources and opportunities. In light of the foregoing discussion, the Applicant finds that the further processing application advances the specific policies of the Mid-City Area Element that are listed below:

MC-1.1 Guiding Growth and Neighborhood Conservation

- Policy MC-1.1.2: Directing Growth
- Policy MC-1.1.3: Infill and Rehabilitation
- Policy MC-1.1.6: Mixed-Use Districts
- Policy MC-1.1.8: Multimodal Connections
- Policy MC-1.1.12: Green Development Practices
- Action MC-1.1.A: Multimodal Improvements
- Action MC-1.1.B: Off-Street Parking

MC-1.2 Conserving and Enhancing Community Resources

- Policy MC-1.2.6: Neighborhood Greening

MC-2 Policy Focus Areas

- Policy MC-2.1.1: Revitalization of Lower Georgia Avenue NW
- Policy MC-2.1.2: Georgia Avenue NW Design Improvements
- Policy MC-2.1.3: Howard University
- Action MC-2.1.C: Howard Town Center

K. Small Area Plan: DUKE Development Framework for a Cultural Designation District within Washington, DC's Shaw / U Street

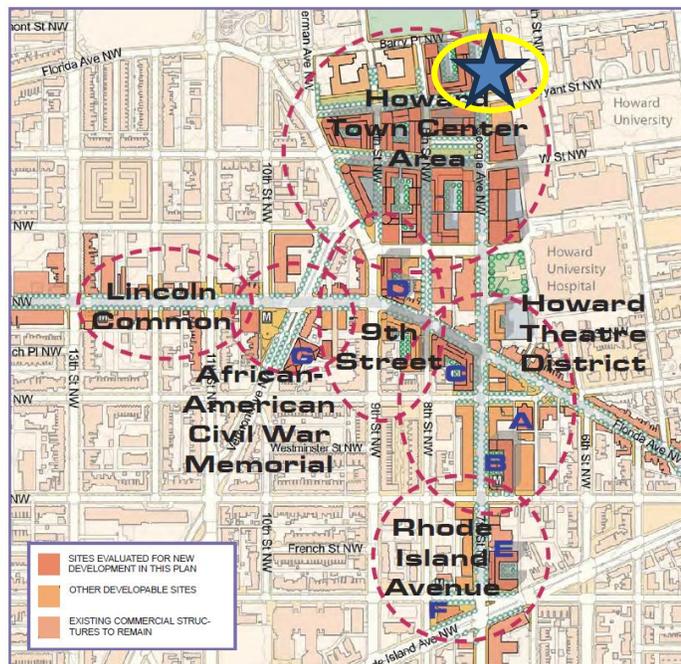
The Comprehensive Plan requires zoning to be “interpreted in conjunction with . . . approved Small Area Plans pertaining to the area proposed for rezoning.” 10-A DCMR § 2504.5 See Policy IM-1.3.3, titled “Consultation of Comprehensive Plan in Zoning Decisions”. The Comprehensive Plan also states that small area policies appear in “separately bound Small Area Plans for particular neighborhoods and business districts.” 10-A DCMR § 104.2. As specified in the city’s municipal code, Small Area Plans provide supplemental guidance to the Commission and other District agencies in carrying out the policies of the Comprehensive Plan. See D.C. Code § 1-306.03(c)(4).

The Property is subject to the policies and recommendations of the “Development Framework for a Cultural Destination District within Washington DC’s Greater Shaw / U Street,” which is the approved Small Area Plan known as the “DUKE Plan.” The DUKE Plan provides direction to the community, private sector and public agencies in revitalizing the neighborhood to achieve a cohesive and inclusive district that meets the community and District government development goals. See DUKE Plan at pg. 4. The DUKE Plan calls for “land use adjustments that can be implemented through amendments to the zoning map, planned unit developments, and amendments to the zoning text [and] [t]his Plan provides additional guidance to the Commission as they consider zoning actions for the area.” *Id.* at 37.

It is important to note that because the DUKE Plan was approved and adopted by the D.C. Council in 2005, prior to the most recent updates to the Comprehensive Plan, it is likely that many of its policies and recommendations are embedded in the Mid-City Area Element, or the Georgia Avenue NW Corridor Focus Area.

As shown in the figure to the right, the Property is located in the boundaries of the Howard Town Center Area Sub-district. See DUKE Plan pp. 13, 14, 18, and 30.

The Howard Town Center Area is envisioned as a university and neighborhood district that is a highly complementary Sub-district to all others, where Howard and other property owners can develop their properties in accordance with the DUKE Plan. See DUKE Plan, p. 30. The DUKE Plan provides several guidelines for development in this area, including the following that would apply specifically to the Property:



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- Include uses compatible with the rest of the Project Area, i.e. residential, restaurants, clubs and neighborhood-serving retail and services.
- Redevelop area with buildings up to 90 feet in height (matter of right) and density of 6.0 FAR. Ground floor retail heights should be consistent with remainder of Project Area.
- Require neighborhood serving convenience retail and service uses (e.g., supermarket and drugstore) on the ground floors along Georgia Avenue and V Street, with space and mix sufficient to meet demand of surrounding residents and the Howard University community.
- Upper floors of buildings to be predominantly commercial, with some institutional and residential mixture.
- Place parking below grade and/or in structured parking structures; sized to meet shared and joint use of on-site uses and nearby destination uses. Blocks between the proposed Bryant and W Street should be primarily institutional (Howard University) with a mixture of commercial and residential uses.
- Make smaller public spaces scaled to the city and distinct from the larger campus quadrangles.
- Avoid continuous 90' cornice expression along Georgia Avenue. Vary roof heights.

[See DUKE Plan, p. 30.]

The Application is consistent with these guidelines that are relevant to the Property. The Project will not only address Howard's needs by integrating a mix of residential, recreational, and retail uses, but will revitalize the surrounding neighborhood by providing this mix of uses at a prime location along the Georgia Avenue corridor. The project ensures that both residents and the Howard community will have convenient access to essential services. The proposed building will be developed with a maximum height of 90 feet and a density of 4.52 FAR, allowing the area to accommodate growth while maintaining a cohesive design that complements the existing character.

The proposed design will also help to enhance the quality of life within the surrounding area, as called for by the DUKE Plan. *See* DUKE Plan at p. 32. The project emphasizes urban-friendly, pedestrian-oriented public spaces to create inviting areas for the Howard community and visitors. Parking will be provided below-grade to optimize ground-level space for active uses and shared access, reducing street congestion. Varying roof heights along Georgia Avenue help to avoid a continuous cornice line, thus adding visual interest and blending the building with surrounding architecture. These approaches contribute to a cohesive urban environment that supports Howard's institutional goals, fosters community interaction, and creates an accessible, lively, and sustainable space for the broader community.

DUKE Plan Design Guidelines re: Built Form and Ground Floor/Pedestrian Level

The further processing application also aligns with the DUKE Plan's design guidelines concerning the built form and the ground floor/pedestrian level. *See* Duke Plan p. 40. The development will be constructed directly along the side property lines and will be in alignment with other existing buildings along the Georgia Avenue street frontage. A court will be created along the rear property line, providing separation from the buildings located on the property to the

east and allowing the passage of light and air into the uses stacked at the rear of the building, including the student gym, multipurpose rooms and retail space.

The front elevation features thoughtful articulation, with portions of the former bakery building serving as a visually engaging base for the structure. The upper-level addition will be set back from the historic facades, which include decorative cornices, ensuring that the original architectural character is preserved while accommodating modern design elements. Notably, most of the addition is significantly set back from the Georgia Avenue, minimizing its visual impact on the surrounding area. The facades will be enhanced with brick and large recessed windows, with a vertical brick pattern that exaggerates their height and provides visual interest. The pattern and size of residential windows will promote transparency, while the ground-floor retail spaces and entrances will maximize visibility through the decorative arches, creating an inviting atmosphere for pedestrians and enhancing the street's vibrancy.

Based on the ground floor/pedestrian level guidelines provided in the DUKE Plan, the proposed ground floor design should focus on creating an inviting, flexible, and active pedestrian experience. The Project achieves this by incorporating a consistent architectural frame and large arch-shaped window openings on the ground floor to create visual rhythm and allow natural light, thereby enhancing the street's appeal for both pedestrians and occupants. Multiple entrances are provided to ensure easy access and encourage foot traffic, adding to the building's accessibility and creating a sense of permeability. Additionally, the design will use transparent glass for a majority of the ground floor façade, enhancing visibility into retail spaces and providing a sense of openness that discourages the use of black or opaque glass. To meet the guidelines, windows have been placed no higher than 18 inches above the ground and close to the ceiling to maximize transparency and interaction with the streetscape. Overall, these design features will enliven the quality of life both indoors and outdoors within the immediate vicinity of the project.

V. Potential Inconsistencies with Policies of the District Elements

An analysis of potential inconsistencies with the Comprehensive Plan is also necessary to demonstrate that the further processing application is “not inconsistent with the Comprehensive Plan[.]” 11-X DCMR § 500.3. As established by the District of Columbia Court of Appeals, it is not sufficient to simply identify the policies that would be advanced when evaluating a proposal for consistency with the Comprehensive Plan. Rather, because of the overlap within and between the elements the evaluation must also recognize where there may be potential inconsistencies.²

In the event there are inconsistencies, an explanation must be provided as to why said inconsistencies are outweighed by the advancement of other policies and considerations. A

² Since first being adopted by the D.C. Council, the Comprehensive Plan has always recognized that there is intentional overlap between its individual components (elements), and that it is intended to be a policy framework that is to be interpreted broadly and provide guidance to all executive and legislative decision making. Indeed, the first Comprehensive Plan adopted in 1984 stated “[t]he primary dynamic of the District elements of the Plan are the overlapping of its elements’ goals. This overlapping is intentional.” (Section 102, District of Columbia Comprehensive Plan Act of 1984). The current Implementation Element reflects the same language: “[r]ecognize the overlapping nature of the Comprehensive Plan elements as they are interpreted and applied. An element may be tempered by one or more of the other elements.” 10-A DCMR § 2504.6.

“roadmap” of sorts for evaluating a proposal’s consistency with the Comprehensive Plan can be found in the Court’s initial review of the McMillan PUD:

The Comprehensive Plan is a “broad framework intended to guide the future land use planning decisions for the District.” *Wisconsin-Newark Neighborhood Coal. v. District of Columbia Zoning Comm’n*, 33 A.3d 382, 394 (D.C. 2011) (internal quotation marks omitted). “[E]ven if a proposal conflicts with one or more individual policies associated with the Comprehensive Plan, this does not, in and of itself, preclude the Commission from concluding that the action would be consistent with the Comprehensive Plan as a whole.” *Durant v. District of Columbia Zoning Comm’n*, 65 A.3d 1161, 1168 (D.C. 2013). The Comprehensive Plan reflects numerous “occasionally competing policies and goals,” and, “[e]xcept where specifically provided, the Plan is not binding.” *Id.* at 1167, 1168 (internal quotation marks omitted). Thus “the Commission may balance competing priorities in determining whether a PUD is consistent with the Comprehensive Plan as a whole.” *D.C. Library Renaissance Project/West End Library Advisory Grp. v. District of Columbia Zoning Comm’n*, 73 A.3d 107, 126 (D.C. 2013). “[I]f the Commission approves a PUD that is inconsistent with one or more policies reflected in the Comprehensive Plan, the Commission must recognize these policies and explain [why] they are outweighed by other, competing considerations.” *Friends of McMillan Park v. District of Columbia Zoning Comm’n*, 149 A.3d 1027, 1035 (D.C. 2016) (brackets and internal quotation marks omitted).

As detailed above, the proposed further processing of the Campus Plan furthers numerous policies across various elements of the Comprehensive Plan. In conducting its analysis, the Applicant endeavored to find potential inconsistencies within and across the District Elements. The Applicant has not found any substantial or significant inconsistencies that would undermine the proposal’s consistency with the Comprehensive Plan as a whole. **Should OP or the Commission identify any potential inconsistencies, the Applicant reserves the right to address the policy at issue in a supplemental filing or during the public hearing on the application.**

VI. Applicant’s Community Outreach and Engagement (Racial Equity Tool – Part Two)

The Zoning Commission expects racial equity submissions that analysis to include a discussion from the applicant on community outreach and engagement efforts. Part Two also asks the applicant to consider the affected community and address various questions as they pertain to the proposed zoning action, in this case, the Applicant’s request for further processing.

It is important to note that Howard conducted extensive outreach during the campus plan renewal process. The Campus Plan that was ultimately approved by the Commission integrated feedback received from the community. *See, e.g.,* Z.C. Order No. 20-08, Finding of Fact No. 11.

The final order approving the Campus Plan also requires Howard to maintain the Howard University Office of External Affairs Community Advisory Council (the “**Howard CAC**”). Under the Campus Plan, the Howard CAC is tasked with providing updates to the campus community on various topics, such as proposed development, while receiving feedback from a broad array of stakeholder groups. The Howard CAC is also required to hold meetings at least once in each quarter of the year. *See* Z.C. Order No. 20-08, Decision D. The Howard CAC includes Shaw Main Street, Lower Georgia Avenue Main Street, Councilmember’s Office, Florida Ave Baptist Church, LeDroit Park Civic Association, Georgia Avenue Thrive, District Bridges, Uniting Our Youth, Pleasant Plains Civic Association, HU Alumni-members of the OEA Community Advisory Council, and Howard’s Interim Dean Bradford Grant- College of Architecture.

With respect to this Application, Howard initiated community outreach long before filing the Application. The Project was presented to the Howard CAC on July 13, 2023, and on May 22, 2024. Also, on February 22, 2024, Howard and the Applicant’s representative discussed the Project with Commissioner Philip Newland, the Single-Member District representative for ANC 1E-05.

Howard and the Applicant will continue to engage the ANC throughout the processing of this Application and will seek ANC 1E’s support prior to the public hearing. Should the Applicant receive additional feedback from the community, the Applicant will provide that information to the Zoning Commission in a supplemental filing, which will be filed no later than 30 days prior to the public hearing in accordance with the Zoning Regulations.

A. Community(ies)

Community is defined by the American Psychological Association as a socially organized group of people living in a physically defined locality. Communities are often characterized by (a) commonality of interests, attitudes, and values; (b) a general sense of belonging to a unified, socially integrated group; (c) members’ self-identification as community members; and (d) some system of communication, governance, education, and commerce.³ Community may be experienced differently by people with diverse backgrounds.

What community is impacted by the zoning action?

The geographical boundaries of the community are generally north of Florida Avenue, N.W., south of Columbia Road, N.W., east of Sherman Avenue, N.W., and west of 5th Street. Improvements to Howard impact several adjacent neighborhoods, including LeDroit, Shaw, Bloomingdale, Pleasant Plains, and Columbia Heights. The area is home to a diverse range of communities with a shared sense of identity, each of which may experience the impacts of new development differently. While the neighborhood is rich in African American history and culture, it is also shaped by other communities that have made significant contributions, including professionals in the health and science fields, as well as artists.

What specific factors define the impacted community?

³ *See* [APA Dictionary](#).

Howard is generally located within the Shaw neighborhood, and both Shaw and Howard have rich histories tied to African American culture and civil rights. Shaw was a center of African American culture in the early 20th century, while Howard played a pivotal role in the civil rights movement (*See* Campus Plan at p. 33). This shared history contributes to the area’s strong sense of heritage. Howard’s presence significantly influences Shaw’s demographics, bringing in students and faculty who contribute to a youthful and diverse population. Shaw residents also benefit from access to many of Howard’s facilities and amenities, such as libraries, sports facilities, and healthcare services, enhancing their quality of life.

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

Those who may be burdened as a result of the further processing application include the residential areas neighboring Howard because the Project will bring more student and university uses to the Georgia Avenue corridor, which could result in increased noise and increased pedestrian and vehicular traffic.

New development also has the potential to increase the assessed value of properties adjacent to the Property, which may result in increased property taxes and indirect displacement. However, the Office of Tax and Revenue offers tax relief and credit programs to assist eligible homeowners with increased property taxes, including the Assessment Cap Credit, Senior Assessment Cap Credit, First-Time Homebuyer Individual Income Tax Credit, Homestead Deduction, Individual Income Property Tax Credit, Lower Income Home Ownership Tax Abatement, Lower Income, Long-Term Homeowners Tax Credit, and Low-Income Senior Citizen Property Tax Deferral.⁴

The Comprehensive Plan verifies the success of these programs, providing that “[t]he District has taken enormous strides toward strengthening its affordable housing infrastructure. The city has some of the strongest tenant protection provisions in the country; the highest level, per capita, for affordable housing investment; the lowest residential real property tax rate in the region; and provides additional discounts for seniors and renters. It has innovative programs such as tax abatements to stimulate the development of workforce housing. From 2015 to 2018, the District of Columbia has successfully delivered, through subsidy or inclusionary zoning, 5,352 new or preserved affordable housing units.” *See* 10-A DCMR § 206.11.

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

The primary beneficiary of the Project will be Howard; however, the neighboring residents and businesses will benefit from the economic vitality, improved aesthetics and enhanced safety that typically results from the redevelopment of an underutilized parcel. Also, continued improvements to Howard, one of the country’s premier HBCU’s benefits the District, generally.

⁴ Summaries regarding DC Office of Tax and Revenue tax relief and credit programs are available [here](#).

B. Past and Present Racial Discrimination / Harm to Community

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

Being a historically Black university (“HBCU”) located in the District, Howard has a complex history intertwined with the broader issues of racial discrimination and inequality in the United States. Some of the negative conditions that have been associated with HBCUs, generally, include:

- Funding disparities when compared to predominantly white institutions. See [Achieving Financial Equity and Justice for HBCUs](#), The Century Foundation;
- Disparities in resources, facilities, and faculty salaries. See [The Educational Effectiveness of Historically Black Colleges and Universities](#), U.S. Department of Education; and
- Legacy of Segregation: Many HBCUs, including Howard, were founded during the era of segregation when Black students were denied access to predominantly white institutions. See The Facts on HBCUs: See [Top 10 Facts about Historically Black Colleges and Universities](#), The Century Foundation.

Howard has continued to work to address these historical challenges and has played a pivotal role in advancing opportunities for Black and African American students and promoting social justice.

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

There are ongoing efforts at Howard to address past discrimination and promote equity and inclusion:

- Center for Race and Culture: Howard has historically played a significant role in advocating for civil rights and social justice. The university continues to house research centers and institutes dedicated to studying and addressing issues related to race, culture, and social justice. See [Howard University Social Justice Consortium](#), Howard University.
- Curriculum and Education: Howard University has integrated discussions on race, discrimination, and social justice into its curriculum across various disciplines. This includes courses, lectures, and workshops that engage students in critical conversations about the history and impact of discrimination. *Id.*
- Student Organizations: Student-led organizations on campus, such as the NAACP chapter and various multicultural and diversity-focused clubs, often work on initiatives related to addressing discrimination, raising awareness, and advocating for change. See [Student Organizations](#), Howard University.

- **Social Justice Initiatives**: Howard has been involved in various social justice initiatives and movements, such as protests and activism, to address contemporary issues related to discrimination and inequality. See [Civil Rights Tour: Protest – Howard University](#), DC Historic Sites.
- **Community Outreach**: Howard has a history of community engagement and outreach programs that address issues like education inequality, healthcare disparities, and economic challenges faced by marginalized communities in the Washington, D.C. area. See [Serve the Community](#), Howard University.
- **Policy Advocacy**: Howard’s faculty and students have been involved in policy advocacy work at the local, state, and national levels to push for changes in policies and legislation that address systemic discrimination. See [Racial Justice Groups Urge Lawmakers to Address Structural Racism in Coronavirus Relief](#), The Dig, Howard University.
- **Research and Scholarship**: Faculty members at Howard University are engaged in research and scholarship related to racial discrimination, social justice, and equity. This research contributes to a better understanding of these issues and informs policy and practice. See [Howard University Social Justice Consortium](#), Howard University.

C. Community Participation / Outreach Efforts

What unique factors about the affected community and/or communities influenced your outreach plan / efforts? How were your outreach efforts proactive in terms of meeting community needs and circumstances?

As discussed above, the Howard CAC includes numerous stakeholders and meets regularly to discuss a range of relevant issues related to Howard and the surrounding community. This platform allows Howard to understand what concerns, if any, the community has related to Howard’s real estate development projects. This Application is responsive to feedback received during the campus plan renewal process and the related map amendment petition being processed under Z.C. Case No. 24-01. A distinctive aspect of this Application its focus on student housing, which addresses a critical need for Howard.

D. Community Priorities and Impact on Zoning Action

The Project is responsive to the community priorities as reflected in the Campus Plan.

VII. Disaggregated Data Regarding Race and Ethnicity (Racial Equity Tool – Part Three)

According to the Racial Equity Tool, “[t]he 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.” (Emphasis added.) The Applicant will provide any additional information as requested by the Commission.

VIII. Evaluating Zoning Action (Racial Equity Tool – Part Four)

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 Project 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 Mid-City Planning Area and specifically those living around the Howard central campus are experiencing. Throughout the processing of this Application, both Howard and the Applicant will continue engaging with the affected ANC and community.

Evaluation of Equitable Development Indicators		
Indicator	Measure	Outcome / Applicable Public Benefit
Displacement		
Physical	· Displacement due to redevelopment.	· No physical displacement of residents or current Howard students · Current lessees are national tenants and have been apprised of pending redevelopment
Economic	· Displacement due to housing cost increases.	· Provision of retail density that can increase economic opportunity in the Planning Area. · Increase in student housing will increase the supply of housing in the surrounding neighborhoods, potentially contributing to a decrease in the cost of housing overall.
Cultural	· Loss of sense of belonging or shared identity in neighborhood.	· Shared, collegiate identity enhanced given project’s desirable, gateway location. · Project offers opportunities to meet and gather (e.g., courtyards, ground-floor retail, student dining hall) · Improved public space creates opportunities for art or other neighborhood-defining features.

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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"> Student housing is excluded from IZ requirements; however, project is likely to help increase supply of housing in the surrounding neighborhoods, potentially reducing the cost of housing.
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"> 0.3 mile walk to Shaw-Howard University metro station. 0.3 mile walk to U Street / African American Civil War Memorial metro station. Located along Georgia Ave. Priority Corridor Network Metrobus Route. Adjacent to U Street Priority Corridor Network Metrobus Route.
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"> Improvement of pedestrian connectivity. Ground floor activation improves connectivity, walkability and safety. Creation of construction jobs.
Employment		
New Jobs		<ul style="list-style-type: none"> Proposed project will result in an increased number of jobs related to maintaining the student housing and amenities, student dining hall, the fitness center, the retail space. New construction-related jobs.
Access to Jobs		<ul style="list-style-type: none"> Property is in close proximity to transit centers. Property is in close proximity to residential uses. Property is within Howard's central campus, an employment center.
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"> Project includes large fitness center. Proximity to Howard, Medical Centers and Hospitals. the Reservoir District (formerly "McMillan"), and retail and neighborhood services along Georgia Ave. corridor.
Environmental		
	<ul style="list-style-type: none"> LEED rating. Use of renewable energy sources. Storm water management. Placement of unwanted / high-impact land uses 	<ul style="list-style-type: none"> Improved storm water infrastructure. Redevelopment will adhere to applicable Building Code requirements and integrate energy-efficient building systems and

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		technologies (e.g., green roofs, flexible lawn space).
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"> · Project will include large fitness center/recreational component · Proposed building will provide retail, therefore granting the Howard community and residents more access to day-to-day needs. · Proximity to nearby retail, service, and neighborhood-servicing uses on Georgia Ave. corridor. · Proximity to parks, open space, recreation. · Proximity to Banneker Community Center · Proximity to The Park at LeDroit and K C Lewis Neighborhood Parks