

Exhibit G

Evaluation of Consistency with the Comprehensive Plan and Other Adopted Policies

In review of an application for a planned unit development and zoning map amendment, the Commission must find the proposal to be not inconstant with the Comprehensive Plan (D.C. Law 23-0217 (Comprehensive Plan Amendment Act of 2017) and D.C. Law 24-0020 (Comprehensive Plan Amendment Act of 2020)) (the “Comprehensive Plan”) and other adopted public policies related to the subject Property. The Comprehensive Plan guides development in Washington, DC, both broadly and in detail, through maps and policies that address physical development in the city. 10A DCMR § 103.2. The District of Columbia Court of Appeals has held that when reviewing a zoning application, the Commission should consider the Comprehensive Plan “as a whole” even if an application presents inconsistencies with individual objectives or elements of the Comprehensive Plan. *See Friends of McMillan Park v. District of Columbia Zoning Comm’n.*, 211 A.3d 139, 144 (D.C. 2019).

Racial equity is a primary focus of the Comprehensive Plan. As part of the Comprehensive Plan analysis, the Commission is now required to “evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis.” *Id.* § 2501.7. 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.’” *Id.* § 213.8. Accordingly, the Comprehensive Plan calls for “[a]ddressing issues of equity in transportation, housing, employment, income, asset building, geographical change, and socioeconomic outcomes through a racial equity lens.” *Id.* § 213.10.

The Framework Element states that equity is both an “outcome and a process,” and exists “where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender.” *Id.* § 213.6. The Comprehensive Plan places an emphasis on considerations of racial equity which must be part of a District agency’s evaluation and implementation of Comprehensive Plan policies. Thus, the Implementation Elements calls for agencies to develop and implement tools to be used in evaluating and implementing the Comprehensive Plan through a “racial equity lens.” The Zoning Commission considers racial equity “as an integral part of its analysis as to whether a proposed zoning action is “not inconsistent” with the Comprehensive Plan.” *Id.* § 2501.8.

The following racial equity analysis is guided by the Zoning Commission’s Racial Equity Analysis Tool (the “**Racial Equity Tool**”)¹ and the Office of Planning’s Equity Crosswalk (effective August 21, 2021) (the “**Equity Crosswalk**”), which highlights the Comprehensive Plan policies and actions that explicitly address racial equity.

I. PART ONE: EVALUATION OF COMPREHENSIVE PLAN CONSISTENCY

Pursuant to Part One (Racial Equity Analysis Submissions – Guidance Regarding the Comprehensive Plan) of the Racial Equity Tool, the Applicant has conducted a thorough evaluation of the Application’s consistency with the Comprehensive Plan, including the policies

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

of all applicable Citywide and Area Elements, the FLUM, GPM, and any other applicable adopted public policies and active programs. Overall, when viewed through a racial equity lens, the Application is not inconsistent with the Comprehensive Plan.

Table 1 identifies the specific Comprehensive Plan policies that will be advanced by the Project, as described in more detail below. The table also highlights policies that explicitly focus on advancing racial equity, as identified by the Equity Crosswalk.

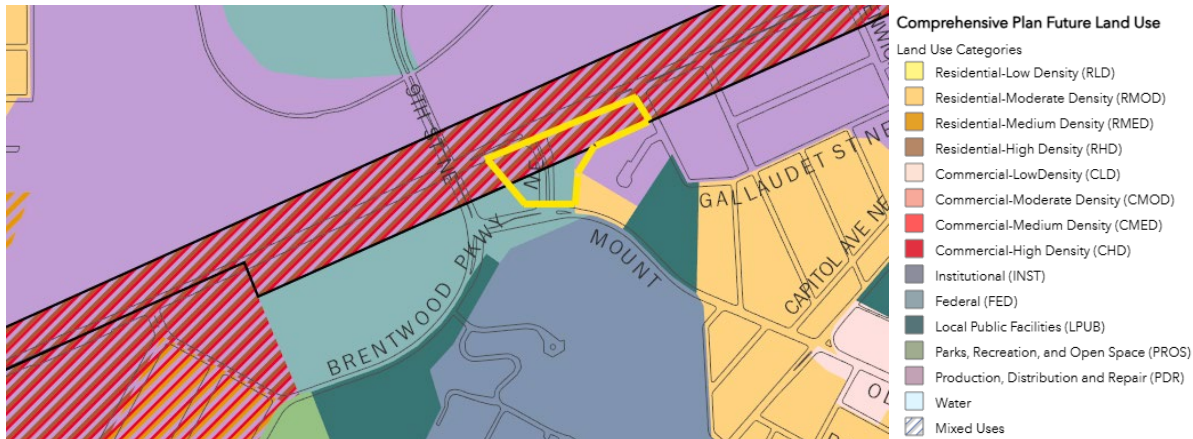
Table 1: Summary of Comprehensive Plan Policies Advanced by the Project
Policies in <u>bold underlined</u> text denote policies that are specifically referenced in the OP Equity Crosswalk as being explicitly focused on advancing equity.
Land Use Element: LU-1.3.3; <u>LU-1.3.4</u> ; LU-1.3.5; LU-1.3.A; LU-1.4.6; LU-2.2.4; LU-2.3.4; LU-2.3.5; LU-3.5.1; LU-3.5.2
Transportation Element: T-1.2.1; T-2.4.1; T-2.4.2; T-2.4.B; T-2.5.4; T-2.5.5
Housing Element: H-4.1.3; H-4.2.1; H-4.2.2; H-4.2.A; H-4.3.1
Environmental Protection Element: E-2.1.2; E-2.1.3; E-2.1.5; E-2.1.A; E-2.1.B; E-2.1.C; E-2.5.1; E-2.5.3; E-2.5.D; E-3.2.2; E-3.2.3; E-3.2.6; E-3.2.7; E-3.2.8; E-4.1.1; E-4.1.2
Urban Design Element: UD-1.2.1; UD-1.4.1; UD-1.4.2; UD-1.4.3; UD-1.4.4; UD-4.1.5; UD-4.2.1; UD-4.2.4
Community Services and Facilities Element: CSF-1.1.2; CSF-1.1.7
Upper Northeast Area Element: UNE-1.2.1; UNE-2.1.4; UNE-2.1.5; UNE-2.3.1

A. Framework Element and Maps

The Framework Element in the Comprehensive Plan incorporates guidelines for interpreting two primary policy maps, the Future Land Use Map (“**FLUM**”) and the Generalized Policy Map (“**GPM**”). The D.C. Council recently amended the Framework Element, which states the “[GPM] and the [FLUM] are intended to provide generalized guidance for development and conservation decisions, and are considered in concert with other Comprehensive Plan policies.” 10A DCMR § 228.1. “By definition, the [FLUM] is to be interpreted broadly and the land use categories identify desired objective.” *Id.* As such, the zoning of any given area should be guided by the FLUM “interpreted in conjunction with the Comprehensive Plan, including the Citywide Elements and the Area Elements.” *Id.*

i. *Future Land Use Map*

The Property is designated for High Density Residential, High Density Commercial, Production, Distribution and Repair, and Federal uses on the FLUM.



The Framework Element defines these designations as follows:

- **High Density Residential:** This designation is used to define neighborhoods and corridors generally, but not exclusively, suited for high-rise apartment buildings. Pockets of less dense housing may exist within these areas. Density is typically greater than a FAR of 4.0, and greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The RA-4 and RA-5 Zone Districts are consistent with the High Density Residential category, and other zones may also apply. 10A DCMR §227.8.
- **High Density Commercial:** This designation is used to define the central employment district, other major office centers, and other commercial areas with the greatest scale and intensity of use in the District. Office and mixed office/retail buildings with densities greater than a FAR of 6.0 are the predominant use, although high-rise residential and many lower scale buildings (including historic buildings) are interspersed. The MU-9, D-3, and D-6 Zone Districts are consistent with the High Density Commercial category, and other zones may also apply. 10A DCMR §227.13.
- **Production, Distribution and Repair:** The Production, Distribution, and Repair (PDR) category is used to define areas characterized by manufacturing, warehousing, wholesale and distribution centers, transportation services, food services, printers and publishers, tourism support services, and commercial, municipal, and utility activities which may require substantial buffering from housing and other noise-, air-pollution and light-sensitive uses. This category is also used to denote railroad rights-of-way, switching and maintenance yards, bus garages, and uses related to the movement of freight, such as truck terminals. It is important to ensure that adequate, appropriate land is provided for these PDR uses

that are critical to supporting the retail, transportation and service needs of the city. A variety of zone districts apply within PDR areas, recognizing the different intensities of use and impacts generated by various PDR activities. The corresponding zone category is PDR, and the present density and height limits set in these districts are expected to remain for the foreseeable future. Other districts may also apply where the PDR map designation is striped with other land uses. In an area striped to include PDR, development must include PDR space, and on sites containing existing PDR space the amount of PDR space on-site should be substantially preserved. 10A DCMR § 227.14.

- **Federal:** This designation includes land and facilities owned, occupied and used by the federal government, excluding parks and open space. Uses include military bases, federal government buildings, the International Chancery Center, federal hospitals, museums, and similar federal government activities. The "Federal" category generally denotes federal ownership and use. Land with this designation is generally not subject to zoning. In the event federal interests on any given federal site terminate, zoning for these areas should be established in a manner that is consistent with Comprehensive Plan policies. 10A DCMR § 227.16.

Notably, the Property's mixed-use categorization is applied to "areas where the mixing of two or more land uses is especially encouraged," including for "[d]evelopment that includes residential uses, particularly affordable housing, and residentially compatible industrial uses, typically achieved through a Planned Unit Development or in a zone district that allows such a mix of uses." 10A DCMR § 227.20.

The Application is not inconsistent with the FLUM designation because the proposed MU-9 zone district is expressly consistent with the High Density Commercial designation. The Project's proposed density and use is otherwise consistent with the High Density Residential and Commercial designations. Additionally, with respect to the Federal designation, the Property will continue to be federally-owned property, with the District of Columbia authorized to use the site under a Transfer of Jurisdiction. As outlined below, the Land Use Element encourages federal and local cooperation to allow federal land to meet the needs of the District of Columbia government.

The Application is not inconsistent with the FLUM despite the Property's PDR use designation. As noted, land that is designated for PDR use generally "must include PDR space," and existing PDR space on such a property should be "substantially preserved." 10A DCMR § 227.14. However, the Comprehensive must be viewed "as a whole" and the PDR use designation should be balanced against competing policies and priorities.

The Property is not currently zoned PDR, nor is there an existing PDR use of the Property; thus, no existing PDR use must be evaluated for preservation. The Project does not include or propose any PDR space because it will instead meet an urgent need of the District of Columbia government to provide a new facility for men experiencing homelessness, with specific programming that includes a work program, senior housing, respite housing, hypothermia shelter, and Day Center. As outlined in the Application, the policy priorities are set forth in Homeward DC 2.0, which focuses on dedicating resources and services to assisting individuals experiencing

homelessness. The Project has a greater potential for addressing and responding to a current need of the District, as specifically articulated by the Mayor, as compared to utilizing the Property for a PDR use. Further, it would not be appropriate to co-locate a PDR use with the programming for men experiencing homelessness. As such, the Application is not inconsistent with the FLUM despite the PDR designation.

ii. *Generalized Policy Map*

The Property is also designated as a Federal Lands use and Future Planning Analysis Area on the GPM.



The Framework Element does not expressly define the “Federal Lands” designation, but notes that “[f]ederal lands are called out to acknowledge the District's limited jurisdiction over them but are still discussed in the text of the District Elements.” 10A DCMR § 225.22. As to the “Future Planning Analysis Area” designation, the Framework Element provides the following definition:

- Future Planning Analysis Area:** Areas of large tracts or corridors where future analysis is anticipated to ensure adequate planning for equitable development. Boundaries shown are for illustrative purposes. Final boundaries will be determined as part of the future planning analyses process for each area. Planning analyses generally establish guiding documents. Such analyses shall precede any zoning changes in this area. The planning process should evaluate current infrastructure and utility capacity against full build out and projected population and employment growth. Planning should also focus on issues most relevant to the community that can be effectively addressed through a planning process. Individual planning analyses may study smaller areas than the Analysis Area. For the purposes of determining whether a planning analysis is needed before a zoning change, the boundaries of the Future Planning Analysis Areas shall be considered as drawn. The evaluation of current infrastructure and utility capacity should specify the physical or

operational capacity both inside the boundaries and any relevant District-wide infrastructure available. 10A DCMR § 2503.2.

The Application is not inconsistent with the Federal Lands designation as the Property will remain federally-owned but will be improved and managed by the District of Columbia pursuant to a Transfer of Jurisdiction.

The Implementation Element states that rezoning proposals located within the boundary of a Future Planning Analysis Area may be considered upon the completion of a Small Area Plan, development framework, technical study, design guidelines, Planned Unit Development, master plan already approved by the National Capital Planning Commission, or the rezoning proposal would have been consistent with the 2012 FLUM. See 10A DCMR § 2503.3. The New York Avenue NE Vision Framework (“**Vision Framework**”) was completed by the Office of Planning (“OP”) in November 2023, and thus allows for the Application to be considered by the Zoning Commission. As described in subsections I-J below, the Project is not inconsistent with the Vision Framework and the draft text of the Ivy City Small Area Plan (“**Ivy City SAP**”), which is currently pending before the D.C. Council.

B. Land Use Element

The Comprehensive Plan’s Land Use Element “integrates the policies and objectives of all the other District Elements,” and, as such, “should be given greater weight than the other elements as competing policies in different elements are balances.” 10A DCMR § 300.3. The Project furthers the following Land Use Element policies:

Policy LU-1.3.3: Federal Sites

Work closely with the federal government and the community on reuse planning for those federal lands where a change of use may take place. Even where such properties will remain in federal use, the impacts of new activities on adjacent neighborhoods should be acknowledged and proactively addressed by federal parties. 306.9

Policy LU-1.3.5: Public Benefit Uses on Large Sites

Given the significant leverage the District has in redeveloping properties that it owns, include appropriate public benefit uses on such sites if and when they are reused, and involve the public in identifying benefits. Examples of such uses are housing, especially deeply affordable housing, and housing serving families, older adults, and vulnerable populations; new parks and open spaces; health care and civic facilities; public educational facilities and other public facilities; and uses providing employment opportunities for District residents. 306.11

Policy LU-1.4.5: Development Along Corridors

Encourage growth and development along major corridors, particularly priority transit and multimodal corridors. Plan and design development adjacent to Metrorail stations and corridors to respect the character, scale, and integrity of adjacent neighborhoods, using approaches such as building design, transitions, or

buffers, while balancing against the District's broader need for housing. 10A DCMR § 307.14

Policy LU-2.2.4: Neighborhood Beautification

Encourage projects that improve the visual quality of neighborhoods, including landscaping and tree planting, facade improvement, anti-litter campaigns, graffiti removal, murals, improvement or removal of abandoned buildings, street and sidewalk repair, park improvements, and public realm enhancements and activations. 10A DCMR § 311.5.

Policy LU-2.3.5: Institutional Uses

Recognize the importance of institutional uses, such as private schools, childcare facilities, hospitals, churches, and similar uses, to the economy, character, history, livability, and future of Washington, DC and its residents. Ensure that when such uses are permitted in residential neighborhoods, their design and operation is sensitive to neighborhood issues and neighbors' quality of life. Encourage institutions and neighborhoods to work proactively to address issues, such as transportation and parking, hours of operation, outside use of facilities, and facility expansion. 10A DCMR § 312.7.

The Project is consistent with the above-referenced policies because it would be located on a federal site, subject to a Transfer of Jurisdiction, along the New York Avenue corridor that would provide a much needed emergency shelter for District residents. The Project's architectural design and proposed landscaping would enhance the visual appeal and aesthetic of the surrounding area, particularly as compared to the existing site. The Project's Welcome Center is designed to limit impacts on neighboring properties by allowing for intake queuing to occur within the Project. There is a second entrance on the Project's western side to further alleviate over-crowding around the main entrance.

C. Transportation Element

Policy T-1.2.1: Major Thoroughfare Improvements

Beautify and stabilize gateways and major thoroughfares by implementing coordinated multimodal transportation, economic development, and urban design improvements. 10A DCMR § 404.4.

Policy T-2.4.1: Pedestrian Network

Develop, maintain, and improve pedestrian facilities. Improve the District's sidewalk system to form a safe and accessible network that links residents across Washington, DC. 10A DCMR § 411.5.

Policy T-2.4.2: Pedestrian Safety

Improve safety and security at key pedestrian nodes throughout the District. Use a variety of techniques to improve pedestrian safety, including textured or clearly marked and raised pedestrian crossings, pedestrian-actuated signal push buttons, high-intensity activated crosswalk pedestrian signals, rectangular rapid flashing

beacons, accessible pedestrian signal hardware, leading pedestrian interval timing, and pedestrian countdown signals. 10A DCMR § 411.6.

Policy T-2.5.4: Traffic Management

Establish traffic management strategies that prioritize the safety of pedestrians over vehicular traffic; separate local traffic from commuter or through-traffic; and reduce the intrusion of trucks, commuter traffic, and cut-through traffic on residential streets. Prioritize public transit solutions, including bus lanes and signal priority, to reduce commuter traffic. 10A DCMR § 412.14.

Policy T-2.5.5: Natural Landscaping

Work with other District and federal agencies to identify, plant, and manage natural landscaping areas along highways, traffic circles, bike paths, and sidewalks. 10A DCMR § 412.15.

The Project will further the transportation policies listed above by improving and beautifying the streetscape along New York Avenue as well as adding a landscape buffer adjacent to the Property to ensure pedestrian safety. The Project will also close an existing curb cut on New York Avenue and provide safer vehicular access off Fairview Street. The Project will incorporate substantial landscape elements on site, including highlighting the Heritage Tree by the Property's frontage. Additionally, the relocated and expanded forest conservation zone on the Property would contribute to the visual improvement of the site.

D. Housing Element

Policy H-4.1.3: Coordination of Housing and Support Services

Coordinate the siting of housing for persons with disabilities or vulnerable populations with the location of the key services that support the population being housed. The availability of affordable public transportation to reach those services also should be considered. 10A DCMR § 516.5

Policy H-4.2.1: Ending Homelessness

Reduce the incidence of homelessness to rare, brief, and nonrecurring events in Washington, DC through prevention efforts, development of permanent supportive housing for people experiencing homelessness in all District Planning Areas, and active coordination of the placement of persons experiencing homelessness into housing that best fits their needs. 10A DCMR § 517.6

Policy H-4.2.2: Neighborhood-Based Services for Persons Living Without Homes

Encourage the provision of services for persons living without homes through neighborhood-based permanent supportive housing and SRO units. The smaller service model can reduce the likelihood of adverse impacts to surrounding uses, improve community acceptance, and also support the reintegration of persons experiencing homelessness back into the community. 10A DCMR § 517.7

Action H-4.2.A: Homeward DC

Implement the recommendations outlined in Homeward DC: 2015-2020, which updates and expands on the Homeward DC: Strategic Plan 2015-2020 and continues the District's efforts to make homelessness in the District rare, brief, and non-recurring. Homeward DC recommended strategies to expand homelessness prevention strategies, improve the quality of the District's emergency shelter facilities, and increase the number of permanent supportive housing units and tenant-based rental subsidies available for populations experiencing or at risk of homelessness. Homeward DC 2.0 builds on the recommendations outlined in Homeward DC and highlights additional strategies to advance these efforts. 10A DCMR § 517.11

Policy H-4.3.1: Short-Term and Emergency Housing Options

Ensure that adequate short-term housing options, including emergency shelter and transitional housing, exist for persons with disabilities, including people living with HIV/AIDS, harm-reduction units for substance abusers, detoxification beds and residential treatment facilities, safe housing for victims of domestic violence, halfway houses and group homes for returning citizens, and assisted-living and end-of-life care for older adults. 10A DCMR § 518.10

The Project meets the goals of the Housing Element, which places a strong emphasis on the provision of housing for those experiencing homelessness and other disadvantaged populations. The Project will provide a new homeless shelter facility with wrap-around services and programming that is intended to reduce the incidence of homelessness in the District of Columbia. The Project incorporates critical services for the homeless population, including medical care and educational/administrative services to help obtain and maintain employment, long-term housing, and financial independence. The Project also provides new housing for homeless seniors as well as work program housing. The Project represents a substantial improvement over the existing men's shelter on New York Avenue, which is in poor condition and does not contain the requisite space for needed services.

E. Environmental Protection Element

Policy E-2.1.3: Sustainable Landscaping Practices

Encourage the use of sustainable landscaping practices to beautify the District, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity. District government, private developers, and community institutions should coordinate to significantly increase the use of these practices, including planting and maintaining mostly native trees and other plants on District-owned land outside the right-of-ways in schools, parks, and housing authority lands. 10A DCMR § 605.7.

Policy E-3.2.2 Net-Zero Buildings

Provide incentives for new buildings to meet net-zero energy design standards, as called for in Clean Energy DC and Sustainable DC 2.0. Establish a path to the phased adoption of net-zero codes between 2022 and 2026. The District's building energy codes should be updated again by 2026 to require that all new buildings

achieve net-zero energy use or better. Prior to 2026, the District should provide incentives to projects that voluntarily seek to achieve net-zero energy use. 612.4

Policy E-3.2.3: Renewable Energy

Promote the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses. The overarching objective should be to achieve reductions in per capita energy consumption. 10A DCMR § 612.5.

Policy E-3.2.6: Alternative Sustainable and Innovative Energy Sources

Support the development and application of renewable energy technologies, such as active, passive, and photovoltaic solar energy; fuel cells; and other sustainable sources such as shared solar facilities in neighborhoods and low- or zero-carbon thermal sources, such as geothermal energy or wastewater heat exchange. Such technology should be used to reduce GHGs and imported energy, provide opportunities for economic and community development, and benefit environmental quality. A key goal is the continued availability and access to unobstructed, direct sunlight for distributed energy generators and passive solar homes relying on the sun as a primary energy source. 10A DCMR § 612.8.

Policy E-3.2.7: Energy-Efficient Building and Site Planning

Include provisions for energy efficiency and for the use of alternative energy sources in the District's planning, zoning, and building standards. Encourage new development to exceed minimum code requirements and contribute to energy efficiency and clean energy goals. 10A DCMR § 612.9.

Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff

Promote an increase in tree planting and vegetated spaces to reduce stormwater runoff and mitigate the urban heat island, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces. 10A DCMR § 615.4.

The Project advances the foregoing environmental protection policies in various ways. First, Project will incorporate substantial new landscaping and trees while preserving existing trees on site, including the Heritage Tree and the Conservation Area. The Project also features a substantial green roof and solar panel array. The Project will incorporate modern stormwater management techniques at the Property. The Project is also designed to meet Net-Zero Energy standards, per the 2017 D.C. Energy Conservation Code and the Greener Government Buildings Amendment Act of 2022 and is intended to achieve LEED Gold v4 certification.

F. Urban Design Element

Policy UD-1.2.1: Respecting Natural Features in Development

Respect and perpetuate the natural features of Washington, DC's landscape as part of new development. In wooded or hilly areas, new construction should preserve natural features rather than alter them to accommodate development. Development in such areas should be clustered to protect topography and provide setbacks as

needed to protect natural features, such as large trees, rock outcroppings, streams, and wetlands. 904.3

Policy UD-1.4.1: Thoroughfares and Urban Form

Use Washington, DC's major thoroughfares to reinforce the form and identity of the District, connect its neighborhoods, and improve its aesthetic and visual character through context-sensitive landscaping, tree planting, and streetscape design. Special attention should be placed on how public space, building restriction areas, and adjacent buildings contribute to each thoroughfare's character. Focus improvement efforts on thoroughfares with limited amenities. 906.3

Policy UD-1.4.2: District Gateways

Create more distinctive and memorable gateways at points of entry to the District and in neighborhoods, parks and open spaces, and neighborhood centers. Gateways should provide a sense of transition, orientation, and arrival through improvements in the form of landscaping, artwork, commemoration, and roadway design. They should be designed to make a strong and positive visual impact. 906.9

Policy UD-1.4.3: Thoroughfare Vistas and View Corridors

Protect picturesque views and view corridors along avenues, parkways, and other major corridors, particularly along streets that terminate, connect, and frame important neighborhood and national institutions, memorials, and parks. Vistas along such streets should be accentuated by street trees and include distinct facades of high architectural quality along well-defined street walls and, if appropriate, maintain a park-like character. 906.10

Policy UD-1.4.4: Priority Avenues and Gateway Corridors

Focus the District's avenue and gateway corridor design improvements on historically important or symbolic streets, including 16th Street, Rhode Island Avenue, North Capitol Street, Pennsylvania Avenue SE, and New York Avenue. Support federal efforts to preserve Constitution and Independence Avenues as major boulevards. Coordinate with NCPC to preserve and enhance the character of avenues and streets with shared federal and local interests that have important viewsheds and connections to federal and cultural structures and open spaces. 906.11

Policy UD-4.2.1: Scale and Massing of Large Buildings

Design the scale, height, volume, and massing of large buildings to avoid monotony and enhance the human scale. Varied roof heights, facade widths, and more expressive massing can provide variety and visual interest. Massing should be articulated with a special emphasis placed on corners, especially along important view corridors or intersections. Patterns of architectural elements, expressive structure, or other design tactics can provide variety and visual interest. 918.3

Policy UD-4.2.4: Creating Engaging Facades

Design new buildings to respond to the surrounding neighborhood fabric by modulating façade rhythms and using complementary materials, textures, and color, as well as well-designed lighting. Varying design tactics may be used to engage a building with its surroundings. In contexts with smaller lot sizes and multiple closely spaced building entrances, breaking up a building façade in the vertical direction is encouraged, along with strongly defined and differentiated bases, centers, and tops of buildings. In areas lacking a strong building-form pattern, the use of complementary or reinterpreted materials and colors could strengthen architectural identity see Figure 9.19 for recommended façade design strategies). 918.6

The Project contributes memorable architecture to improve the aesthetics along New York Avenue, a major boulevard and gateway corridor. The contemporary architectural design, compatible massing, and landscaping would provide a pleasant viewing experience for both residents of the Project as well as pedestrians and motorists passing through the New York Avenue corridor. The Project has been designed to create a presence on New York Avenue, while also setting back a portion of the building to avoid monotony. The stepped terrace feature on both sides of the Project contributes to an engaging façade.

G. Community Services and Facilities Element

Policy CSF-1.1.2: Adequate Facilities

Construct, rehabilitate, and maintain the facilities necessary for the efficient delivery of public services to current and future District residents. 10A DCMR § 1103.13..

Policy CSF-1.1.5: Addressing Facilities That Are Functionally Obsolete

Develop reuse or disposition plans for public buildings or sites that are functionally obsolete, that cannot be rehabilitated cost-effectively, or that are no longer needed. Before any disposition of property is made, consideration shall be given to potential future uses by, and needs of, the District. 10A DCMR § 1103.16.

Policy CSF-1.1.7: Location of Facilities

Ensure that the planning, siting, and design of new public facilities is consistent with Comprehensive Plan goals and policies, including the Future Land Use Map and the Policy Map. 1103.18

Policy CSF- 2.2.1: Behavioral Health and Resilience

Leverage the links between behavioral health and the resilience of individuals to bolster District efforts to build community resilience. These factors include programs and activities that enhance the well-being of Washington, DC residents by preventing or intervening in behavioral health issues, depression or anxiety, and substance abuse. These and other measures can strengthen the ability of individuals, households, and neighborhoods to be prepared for and recover from potential emergencies and disasters. 10A DCMR § 1107.4.

The Project will replace the existing men's shelter on New York Avenue with a new shelter facility that allows the District to better meet the needs of the population that is experiencing

homelessness. A new facility will significantly benefit its residents by offering improved intake procedures, better living conditions, and access to life skills, medical and mental health services. These comprehensive services play a crucial role in helping individuals not only meet their immediate needs but also develop the essential skills required to secure permanent housing. By providing access to healthcare, mental health support, job training, and educational opportunities, these facilities empower individuals to reintegrate into society successfully. With a holistic approach, the Project can aid those in need and create sustainable pathways for individuals to rebuild their lives and regain their independence. The Project is also sited to provide convenient access to public transportation as well as vehicular access for staff.

H. Upper Northeast Area Element

Policy UNE-1.2.1: Streetscape Improvements

Improve the visual quality of streets in Upper Northeast, especially along North Capitol Street, Rhode Island Avenue, Bladensburg Road, New York Avenue, Eastern Avenue, Michigan Avenue, Maryland Avenue, Florida Avenue, West Virginia Avenue, and Benning Road. Landscaping, street tree planting, street lighting, and other improvements should make these streets more attractive community gateways. 2409.1

Policy UNE-2.1.4: Northeast Gateway Urban Design Improvements

Improve the image and appearance of the Northeast Gateway area by creating landscaped gateways into the community, creating new parks and open spaces, upgrading key streets, and improving conditions for pedestrians along Florida Avenue and other neighborhood streets. 2411.9

Policy UNE-2.1.5 Green Spaces in Ivy City

Encourage the preservation and improvement of existing green space in the Ivy City community and identify opportunities to coordinate between public and private landowners to enhance neighborhood access to green space. 2411.10

Policy UNE-2.3.1: New York Avenue Corridor

Improve the appearance of New York Avenue as a gateway to Washington, DC. Support road design changes and streetscape improvements, that improve traffic flow and enhance the road's operation as a multimodal corridor that meets both regional and local needs. 2413.5

The Project will improve the streetscape, including widening the sidewalk and closing a curb cut along the New York Avenue corridor. The Project contributes to the image and appearance of the Northeast Gateway area with inspired architectural design. The Project also preserves and improves the Property's green space with new landscaping and tree plantings. The New York Avenue corridor will be improved with a visual bioretention area, low fences, and open green area around the protected Heritage Tree.

I. Ivy City Small Area Plan

The D.C. Council recently approved the Ivy City Small Area Plan under PR25-0992. As it pertains to the Property, the Ivy City SAP identifies the following policies:

Community Resilience Recommendation 2.5

Expand the use of green infrastructure, such as cool pavements or small-scale solar panels, on existing public lands including the Crummell School, Lewis Crowe Park, and other government properties.

Community Resilience Recommendation 2.6

Encourage new development projects to incorporate green infrastructure elements, such as roof gardens, landscaped terraces, pocket parks, vegetation walls, and decorative planters to help reduce heat island impacts and increase visual appeal in the surrounding neighborhood.

Design Principle A

New buildings are encouraged to incorporate a height step down to soften the transition between the higher density buildings along New York Avenue NE and the lower-density residential areas south of Alexander Crummell Way. New and infill development heights in residential areas should remain moderate, consistent with the existing zoning.

Design Principle E

Building frontages should have variation along streets with continuous massing to ensure a pedestrian-scale of development. This will lessen the perceived length of high-rise buildings or rowhouse groupings. Blank walls should be avoided, particularly along streets and pedestrian ways.

Design Principle H

Building façades should provide a variety of design elements for visual interest. These include textures found throughout the neighborhood (brick and masonry with more contemporary materials as secondary accents), colors, and interesting architectural features that reflect traditional and/or industrial-style architecture and contribute to neighborhood unique visual identity.

Public Space & Urban Design Recommendation 3.6

Enhance the pedestrian experience with streetscape elements, such as pedestrian-scale lighting along the corridor and around block corners of side streets.

The Project furthers the goals of the Ivy City SAP by incorporating a number of sustainability measures, including a green roof and solar array. The Ivy City SAP identifies the neighborhood as a heat island, but the Project's extensive green roof and landscaping will help to mitigate these conditions. The Project's massing is sited away from the rear of the Property in order to respect the small residential pocket along Mount Olivet Road. The building design with two "wings" will lessen the perceived length of the building while also increasing visual interest. The Project's materiality and stepped terraces also contribute to a unique architectural identity

while invoking industrial-style design. Finally, the Project will improve the public space along New York Avenue by widening the sidewalk and adding a landscape buffer.

J. New York Avenue NE Vision Framework

The purpose of the Vision Framework is to provide guidance and a shared vision for the New York Avenue NE corridor's transition from an industrial area to a mixed-use community. The Vision Framework applies to the area along New York Avenue, NE, which runs for nearly three miles, from Florida Avenue, NE, to South Dakota Avenue, NE, and includes a Study Area and a Focus Area. The Property is located within the Vision Framework's Study Area as well as a "Focus Area" along New York Avenue NE. However, the policies of the Vision Framework do not necessarily distinguish based on a property's location in the Focus Area.

The Vision Framework identifies four primary action items, as follows:

Action Item 1: Produce and Preserve Housing

The Vision Framework discusses the need to produce and preserve housing and affordable housing, including actions that will help residents stay in their communities and benefit from the corridor's reinvestment. The plan identifies several recommended actions to achieve these goals, such as increasing awareness of anti-displacement programs, rezoning properties along New York Avenue NE to mixed-use, support projects that provide affordable rental and ownership opportunities through the Housing Production Trust Fund, and more.

While the Project does not provide housing or affordable housing, it does help to alleviate a symptom of the current housing crisis. The Project will provide a new facility that can help men experiencing homelessness receive the support services that they need to find their own permanent housing. Additionally, as envisioned in the Framework Plan, the Application proposes to rezone the Property for mixed-uses. This will allow the portion of the site to the west of the Connector Road to potentially be redeveloped with new housing in the future through a modification of significance to this case.

Action Item 2: Increase Resilience

The Vision Framework calls for reinvestment in the corridor to increase climate resilience by making the neighborhood cooler, less likelier to flood and healthier for residences. The Vision Framework provides several recommendations to address these concerns, including improved streetscape and landscaping, renewable energy, and maximizing tree canopy and green space.

The Project will increase resilience by providing a building that meets net-zero energy goals and incorporates sustainability and bioretention measures such as a green roof and solar array. The Project maintains and improves the extensive green space on site with new landscaping and canopy trees. The Project will also provide a widened landscape buffer along New York Avenue that will also help to reduce impacts of the urban heat island effect.

Action Item 3: Strengthen Connections

The Vision Framework seeks to create better transportation connections along New York Avenue to provide increased access to jobs, healthcare and other services through the city. To achieve this goal, the Vision Framework calls for new mobility features, such as a shared use path and bicycle lanes within the study area. The Vision Framework provides recommended actions that include requiring property owners to improve or add sidewalks when redeveloping properties and exceeding short and long-term bicycle parking requirements.

The Project will contribute to better mobility along New York Avenue by increasing the width of the sidewalk by the Project’s frontage and providing short and long-term bicycle parking within the Project.

Action Item 4: Uplift the Corridor’s Industrial Legacy

The Vision Framework’s fourth and final action item concerns architectural identity. Specifically, the action item calls for retaining the corridor’s unique visual identity as a former manufacturing and warehouse hub while creating new uses and spaces for all residents. To achieve this goal, the Vision Framework recommends actions such as concentrating building height along New York Avenue, locating key features by major intersections, and use of industrial building design elements.

The Project provides contemporary architectural design that will create a memorable presence along New York Avenue. The Project has been designed to create a strong presence on New York Avenue with an engaging façade featuring stepped terraces. The Project also takes its design cues from other industrial buildings in the neighborhood, such as the prominent Hecht Warehouse building, with the stepped façade, punched openings and glass and masonry exterior.

II. PART II: APPLICANT’S COMMUNITY OUTREACH AND ENGAGEMENT

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. 10A DCMR § 213.7. As a process, a racial equity lens is employed when the most impacted by structural racism are meaningfully involved in the creation and implementation of the policies and practices that impact their lives. The Racial Equity Tool places a heavy emphasis on community outreach and engagement, which are expected to begin at the inception of any proposed zoning action. All submissions to the Zoning Commission shall be accompanied by a discussion of efforts taken by an applicant to meaningfully engage the community early in the zoning process.

The information contained in **Table 2** addresses the questions set forth in **Part II** (Community Outreach and Engagement) of the Racial Equity Tool. The responses were informed by the Applicant’s research on the community that could potentially be impacted by the zoning action as well as the Applicant’s direct outreach to the affected community in advance of submitting this proposal.

Table 2: Community Outreach and Engagement
Description of the affected community (including defining characteristics).

The Property is located within the Ivy City neighborhood on the New York Avenue corridor and is within Advisory Neighborhood Commission 5D. Ivy City is an historically black neighborhood where residents originally began to settle in the late 1800's. *See* Ivy City SAP, pg. 9-10. At that time, the area featured widespread employment opportunities through the Baltimore & Ohio Railroad Branch and brick-making industries. *Id.* By the late 19th and early 20th century, Ivy City began to face economic decline and converted into a primarily commercial and industrial corridor. These new uses were precipitated by early zoning maps that zoned much of the neighborhood for industrial uses in part due to the fact that Ivy City was adjacent to rail lines. Over the years, Ivy City increasingly attracted black families with low and moderate incomes. *Id.* However, residents faced racial, social and environmental injustices from the concentration of industrial and commercial uses. *Id.* In the 21st century, Ivy City has seen a resurgence with many of the historic industrial buildings, such as the Hecht Warehouse building, being redeveloped for residential and retail.

Given the Project's programming and goals, it is also important to point that men experiencing homelessness in the District of Columbia are also an "effected community." There are approximately 5,616 individuals experiencing homelessness in the District based on DHS' 2024 "Point in Time" count. *See* <https://www.mwcog.org/homelessnessreport/>. This represents a 14% increase from the 2023 Point in Time study. *Id.* Accordingly, the District of Columbia through the Interagency Council on Homelessness ("ICH") has embarked on goal to make homelessness rare, brief and non-recurring.

Characteristics of the affected community that influenced outreach plan/efforts.

ANC 5D is active, communicative, and well-organized ANC. The Applicant has tailored its outreach efforts through email with the ANC and the Single Member District.

Community outreach timeline/dates of major meetings and points of engagement.

The Applicant has conducted formal engagement with the affected community. The dates of meetings and points of engagement are as follows:

- December 6, 2022 – Town Hall for residents and staff of existing shelter at 1355 New York Avenue NE
- December 7, 2022 – Town Hall for residents and staff of 801 East Men's Shelter
- October 8, 2024 – Presentation to ANC 5D
- November 4, 2024 – Email to SMD Commissioner Rhodes requesting further meeting

The Applicant has also worked with external stakeholders, including ICH. ICH plays a critical role in shaping policy to provide services and support for those experiencing homelessness in the District. The Applicant presented the Project to ICH on August 15, 2024. ICH reviewed the Project and indicated broad support for the Project's design and programming.

Outreach methods utilized (including specific efforts employed to meet community needs and circumstances).

Virtual meetings and email/phone communications.

Members of the affected community that would potentially benefit from the proposed zoning action.

Individuals experiencing homelessness, including those that are located within ANC 5D. Additionally, pedestrians in the neighborhood will benefit as the Project will improve public space adjacent to the Property, making it more safe to walk along New York Avenue.
Members of the affected community that would potentially be burdened by the proposed zoning action.
Although there are a limited number of residents that reside in close proximity to the Property, those that do could experience negative externalities related to construction. The Project will also result in increased activity around the Property, particularly as compared to the existing animal shelter use. The increased activity could burden nearby residents in terms of noise and privacy.
Community input on existing conditions and current challenges that have resulted from past or present discrimination, and current ongoing efforts in the affected community to address these conditions.
<p>Thus far, the community has not yet provided direct input on conditions and challenges that have resulted from past or present discrimination. Nonetheless, based on research, the Applicant understands that as a result of the Ivy City neighborhood's history as an industrial, highly-trafficked area, residents have faced racial, social and environmental injustices.</p> <p>There are on-going efforts to address these conditions. The Vision Framework addresses past discrimination by promoting equity and inclusion through the production and preservation of affordable housing, enhancing environmental resilience with green technologies and increased tree canopy, and improving infrastructure with new sidewalks, bike lanes, and public transportation options. Likewise, the Ivy City SAP aims to address past discrimination by focusing on equitable development, affordable housing, and community engagement.</p> <p>Additionally, it is important to acknowledge the systematic racism that has contributed to homelessness in the District and across the country. Data demonstrates that the racial disparities in housing, health and wealth are the strongest correlating factor to homelessness. <i>See</i> Homeward D.C. 2.0. Without the security and stability provided by a home, individuals who experience homelessness also struggle to maintain access to healthcare, employment, education, healthy relationships, and other basic necessities in life. <i>Id.</i> Experts have also noted that the occurrence of these conditions is correlated with the experience of being homeless. For example, researchers have found that a person who is chronologically 50 years old but has experienced prolonged homelessness will have the biological age of a person in their 70s. <i>Id.</i> Data demonstrates that the racial disparities in housing, health and wealth are the strongest correlating factor to homelessness. <i>Id.</i></p>
Potential positive outcomes of the proposed zoning action identified by the affected community.
The community has indicated its overall support for the Project. The community supports moving the existing homeless shelter at 1355 New York Avenue further from the center of Ivy City.

Potential negative outcomes of the proposed zoning action identified by the affected community.
The community has not yet identified negative outcomes of the proposed zoning action
Changes/modifications made to the proposed zoning action that incorporate/respond to the input received from the affected community.
The Applicant has not yet made changes to respond to community input. As noted, the Applicant intends to hold a community design meeting to elicit feedback on design elements.
Input received from the affected community not incorporated into the proposed zoning action.
None as of this time.
Efforts taken to mitigate potential negative outcomes identified by the affected community.
None as of this time.

III. PART III: DISAGGREGATED DATA REGARDING RACE AND ETHNICITY

As outlined in Part III of the Racial Equity Tool, the Office of Planning will provide disaggregated race and ethnicity data as it pertains to the Project and the Property.

IV. PART IV: ZONING COMMISSION ANALYSIS

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?

Table 3 indicates how the Project will generally result in positive impact to racial equity through the indicators specifically included in **Part IV** (Criteria to Evaluate a Zoning Action Through a Racial Equity Lens) of the Racial Equity Tool.

Table 3: Evaluation of Equitable Development Indicators			
Key:	Positive Outcome	Negative Outcome	Neutral Outcome
Indicator	Aspect(s) of Zoning Action Relating to Racial Equity		Potential Racial Equity Outcome
Displacement (Direct and Indirect)			
Physical (Direct)	-As there are no residents at the Property, physical displacement would not occur.		

	-The existing animal shelter will be re-located off-site.	
Economic (Indirect)	-There would be no economic impacts because there would be no displacement.	
Cultural (Indirect)	-Cultural displacement would not occur thus no mitigation is necessary.	
Housing		
Availability of Housing	-The Project proposes to provide emergency shelter beds for men experiencing homelessness.	
Preservation of Affordable Housing	-The Project provides a form of affordable housing for those experiencing homelessness.	
Replacement Housing	-No housing is currently on the Property.	
Housing Burden		
Homeownership Opportunity	-The Project does not provide homeownership opportunities; however, the Project will offer wrap-around services that can assist residents in finding permanent housing.	
Larger Unit Size	-The programming necessitates smaller units.	
Employment		
Entrepreneurial Opportunities		
Job Creation	-The Project will have staffing needs and, therefore, will create new jobs.	
Access to Employment	-The Project will offer wrap-around services that can assist residents in finding and keeping employment.	
Transportation/Infrastructure		
Public Space/Streetscape Improvements	-The Project will improve the New York Avenue streetscape with a landscape buffer.	
Infrastructure Improvements		
Access to Transit	-The Project is within walking distance to the NoMa/Gallaudet U Metrorail Station and numerous Metrobus stops.	

Pedestrian Safety	-The proposed widened sidewalks will contribute to pedestrian safety	
Education/Health/Wellness		
Schools	-The Project does not anticipate impacts on schools.	
Healthcare	-The Project will provide medical services to residents	
Open Space/Recreational	-The Project provides an outdoor recreation and wellness area for residents.	
Environmental		
Environmental Changes	<p>-The Project will shift and expand the forest conservation zone.</p> <p>-The Shelter will preserve the heritage tree located at the center of the Property.</p> <p>-The Project will provide modern stormwater management throughout the site.</p>	
Sustainable Design	<p>-The Project is designed to meet Net-Zero Energy standards.</p> <p>-The Project is anticipated to achieve LEED Gold v4 certification.</p>	
Remediation		
Access to Opportunity		
Neighborhood Retail and Service Uses		
Residential Amenities	-The Project will provide residents with extensive wrap-around services, a medical clinic, and outdoor recreation space.	