

## **EXHIBIT H-2**

### **RACIAL EQUITY ANALYSIS**

A key racial equity goal of the Comp Plan is supporting growth through a racial equity lens by “providing additional attention and support to communities of color, low-income households, and vulnerable populations and neighborhoods to allow them to share in the prosperity of the District.” 10-A DCMR § 304.2. The Project provides mixed-income home ownership opportunities that will promote economic mobility and financial asset generation in a low-income area of the District. By offering for-sale options at a lower price point than the townhomes, the Project diversifies the housing options available at Skyland Town Center.

The Commission evaluates racial equity as part of its analysis as to whether a proposed zoning action is “not inconsistent” with the Comp Plan. *Id.* § 2501.8. As a companion to Exhibit H-1, this Exhibit H-2 goes into further detail as to how the Project advances the racial equity goals of the Plan. In the case of a modification to a previously approved PUD that has already gone through extensive community engagement during the initial PUD proceeding, the Comp Plan and racial equity analysis is focused on the specific aspects of the proposed PUD modification rather than a full re-evaluation of the overall Approved PUD’s Comp Plan consistency. We have thus focused the below analysis on the proposed PUD modification.

As described further below, the Project furthers the racial equity goals of the Comp Plan by avoiding displacement, improving access to opportunity, and providing new housing, including important homeownership opportunities, in Ward 7.

#### **Racial Equity as a Process**

The Framework Element states that racial equity is a process, and that applying a racial equity lens to issues of equity in transportation, housing, employment, income, asset building,

geographical change, and socioeconomic outcomes will further the District’s goal of addressing systemic drivers of racial inequities. 10-A DCMR § 213.10. As a process, a racial equity lens is applied when those most impacted by structural racism are meaningfully involved in the creation and implementation of the policies and practices that impact their lives. *Id.* § 213.9. The Commission has published the Racial Equity Tool, which emphasizes community outreach and engagement. The information contained in **Table 2** below addresses Part II (Community Outreach and Engagement) of the Racial Equity Tool. As demonstrated below, the Applicant has engaged and will continue to engage with the community during the PUD process with a focus on improving racial equity in the District through the Project.

<b>Table 2: Community Outreach and Engagement</b>
<b>Description of affected community (including defining characteristics).</b>
The Approved PUD is located in Southeast D.C. adjacent to the Hillcrest and Fairlawn neighborhoods, historically important communities for Black middle-class families. Low-rise residential, including garden style apartments and single-family homes, are characteristic of the area.
<b>Characteristics of the affected community that influenced outreach plan / efforts.</b>
To date, the Applicant has relied upon its engagement with the Affected ANCs to inform property owners and residents of the proposed PUD modification.
<b>Community outreach timeframe / dates of major meetings and points of engagement</b>
<p>The Applicant has a long-standing relationship with the community through development of the Skyland Town Center over the past two decades. The Applicant presented the Project to ANC 8B at their regular monthly meeting on May 20, 2025.</p> <p>The Applicant has reached out on numerous occasions to affected ANCs 7B and 8A regarding a presentation about this Application. The Applicant will continue these engagement efforts and looks forward to discussing the Project further with the community.</p>
<b>Members of the affected community that would potentially benefit by the proposed zoning action.</b>

<ul style="list-style-type: none"> <li>• Residents looking for home ownership opportunities at a lower price point than the townhomes.</li> <li>• Residents looking for housing in close walking distance to retail.</li> <li>• The neighboring businesses that will benefit from the addition of new residents.</li> <li>• The neighboring residents that will benefit from a new building and new neighbors as opposed to a vacant lot.</li> </ul>
<b>Members of the affected community that would potentially be burdened by the proposed zoning action.</b>
During construction of the Project, area residents may experience construction-related impacts. However, the Applicant is committed to implementing best practices to mitigate any potential impacts and will work with neighbors to understand their concerns. The addition of 24 new condominium units should not have a large impact on increased traffic or congestion. The Project includes approximately 24 parking spaces and, therefore, should not have an impact on street parking availability in the vicinity.
<b>Potential positive outcomes of the proposed zoning action identified by the affected community.</b>
<p>The affected community previously expressed desire for new homeownership opportunities. The affected community has not identified any positive outcomes related to the Project thus far.</p> <p>The zoning action will not result in displacement of tenants or residents or businesses. The Project will develop currently vacant land with new housing that offers home ownership opportunities.</p>
<b>Potential negative outcomes of the proposed zoning action identified by the affected community.</b>
The affected community has expressed some concern with the loss of senior housing, but has also mentioned the nearby senior living development to be built by Enterprise Community Development located directly across Marion Barry Avenue SE.
<b>Changes / modifications made to the proposed zoning action that incorporate / respond to input received from the affected community.</b>
The affected community has not provided specific input regarding changes to the Project thus far.
<b>Input received from the affected community not incorporated into the proposed zoning action.</b>
The affected community has not provided specific input regarding changes to the Project thus far.
<b>Efforts taken to mitigate potential negative outcomes identified by the affected community.</b>
The loss of senior housing identified by the affected community will be mitigated by the nearby senior living options. In addition to the pending community across the street, Transitional Care Center Capitol City is located approximately 900 feet from the Property, So

Others Might Eat Senior Center (Kuehner Place) is located approximately 0.5 miles from the Property, and Kingdom Care Senior Village is located approximately 1.8 miles from the Property.

### Racial Equity as an Outcome

As an outcome, the District strives to achieve a level of racial equity when race “no longer determines one’s socioeconomic outcomes; when everyone has what they need to thrive, no matter where they live or their socioeconomic status; and when racial divides no longer exist between people of color and their white counterparts.” *Id.* § 213.9. **Table 3** below discusses the proposed PUD modification relative to any anticipated positive and negative impacts and/or outcomes to racial equity. Upon consideration, any impacts resulting from the proposed PUD modification are largely anticipated to be neutral as they relate to racial equity.

<b>Table 3: Evaluation of Zoning Action Through a Racial Equity Lens</b>	
<b>Direct Displacement</b>	The proposed PUD modification will not cause direct residential or commercial displacement as the Property is currently vacant.
<b>Indirect Displacement (Economic and Cultural)</b>	The proposed PUD modification will not lead to indirect economic or cultural displacement within the Property or immediate area. Rather, the new residents of the condominium building will provide additional clientele to help support the surrounding retail center, which is currently only slightly above 50% occupied.
<b>Housing</b>	The proposed PUD modification will offer 24 condominium units, including market rate and affordable units. The lower price point in comparison to the upcoming townhomes will diversify the mix of housing types in the Skyland Town Center. The incoming homeowners of the townhomes will have the freedom to maintain their own landscaping.
<b>Physical</b>	The new residential use will result in a marginal increase in vehicle and pedestrian

	trips to the Property. The new residents will contribute to the mixed-income community that enjoys the benefits, including retail and open space, offered at the Skyland Town Center.
<b>Access to Opportunity</b>	The proposed PUD modification will offer new residents access to the adjacent retail as well as proximity to the major thoroughfares and Metrobus routes abutting the Property.
<b>Community</b>	To date, the Applicant has presented to ANC 8B to inform property owners and residents in the immediate community of the proposed PUD modification. The Applicant has requested the opportunity to present to ANC 7B and ANC 8A and looks forward to discussing the Project with those ANCs in the near future.