

EXHIBIT H

COMPREHENSIVE PLAN / RACIAL EQUITY IMPACT EVALUATION

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1. Racial Equity and the Comprehensive Plan

This proposed application (“**Application**”), which requests approval for the design and uses of a new headquarters for Living Classrooms on Parcel P3 in The Yards, is not inconsistent with the Comprehensive Plan (“**Comp Plan**”) and other adopted public policies.

Standard of Review for Design Review: To approve a design review application, the Zoning Commission must find that the Application “is not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site,” as such Comp Plan, policies, and programs are understood *as a whole*. 11-X DCMR § 604.5.

Relevant Planning Guidance: In the instant application, the relevant planning guidance includes (a) the Comp Plan’s two maps, (b) the District Elements, (c) Area Elements for the Lower Anacostia Waterfront / Near Southwest Planning Area, (d) the federally-approved Master Plan for the Southeast Federal Center (“**Master Plan**”), (e) the Anacostia Waterfront Initiative Framework Plan (“**AWI Plan**”), and (f) the Near Southeast Urban Design Framework Plan (“**NSE Plan**”) all of which must be analyzed through the lens of racial equity in the District.

Racial Equity Lens: Equity, and particularly racial equity, is a primary focus of the Comp Plan, especially with respect to certain priorities such as creating or increasing access to opportunity. 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. 10A DCMR § 213.6. Considerations of racial equity are an integral part of the Zoning Commission’s evaluation and implementation of Comp Plan

policies and actions, and the Commission has developed a Racial Equity Tool that guides this evaluation.

This narrative evaluates the Application's consistency with the Comp Plan in accordance with the Commission's Racial Equity Tool.

2. Evaluation of Comprehensive Plan Consistency¹

Per **Part I (Racial Equity Analysis Submissions – Guidance Regarding the Comprehensive Plan)** of the Racial Equity Tool, the Applicant has conducted a thorough evaluation of the proposed Zoning Map amendment's consistency with the Comp Plan, including the policies of all applicable Citywide and Area Elements, the Future Land Use Map ("FLUM"), Generalized Policy Map ("GPM"), and any other applicable adopted public policies and active programs.

Overall, when viewed through a racial equity lens, the Applicant finds the proposal to be not inconsistent with the Comp Plan. **Table 1** below identifies the specific Comp Plan policies that are advanced by the Application. The Application will facilitate the development of a new Living Classrooms headquarters, which offers a diverse array of services and programs including workforce development, maritime focused education, and retail services.

Table 1: Summary of Comp Plan Policies Advanced by the Proposed Zoning Map Amendment
Lower Anacostia Waterfront / Near Southwest Planning Area Element
AW-1.1.2, AW-1.1.7, AW-1.1.8, AW-2.3.6
Land Use Element
LU-1.2.3, LU-1.2.4, LU-2.3.5, LU-2.4.3
Economic Development Element
ED-2.2.1, ED-2.2.3, ED-2.2.5, ED-2.2.8, ED-2.3.2, ED-2.3.3, ED-2.3.9, ED-2.3.10, ED-4.2.1, ED-4.2.2, ED-4.2.3, ED-4.2.4, ED-4.2.5, ED-4.2.6, ED-4.2.7, ED-4.2.9, ED-4.2.11
Educational Facilities Element
EDU-3.2.3
Parks, Recreation, and Open Space
PROS-1.2.2, PROS-1.2.3, PROS-1.2.B, PROS-1.3.1, PROS-1.3.3, PROS-1.3.4, PROS-1.3.6, PROS-1.3.8, PROS-2.1.3, PROS-2.1.5, PROS-2.2.3, PROS-2.2.5, PROS-3.2.1, PROS-3.2.3, PROS-3.2.4, PROS-3.2.5
Urban Design
UD-1.3.1, UD-1.3.2, UD-1.3.6
Historic Preservation
HP-2.5.3

¹ Much of this analysis mirrors the analysis conducted for the text amendment related to the Application that is pending final action in Z.C. Case No. 24-18.

The full text of all the Comp Plan policies listed above are included in the Appendix to this analysis beginning on page 9 below.

A. Southeast Federal Center Master Plan

Any evaluation of the Application's consistency with background planning principles begins with a consideration of the Master Plan.

Here, the Application generally furthers well-established planning goals for the P3 Parcel. The Commission established zoning for the Southeast Federal Center two decades ago, in accordance with the Master Plan and in anticipation of its eventual disposition for non-Federal use. Pursuant to the Master Plan, the Commission mapped the future Waterfront Park with the unique SEFC-4 zone, which mandated much of the area remain as open space but also allowed for the construction of active retail and other uses in a “development zone” within the Park. After the basic zoning framework was established, the General Services Administration selected Forest City as the master developer, and the Master Plan was amended to align with Forest City’s proposed development plan. This development plan included the P3 Parcel with an active “cultural and community-serving” use that was always intended for Living Classrooms.

The Master Plan anticipates an expected maximum building height of 45 feet, an expected gross floor area, in combination with other pavilions in Yards Park, of approximately 80,000 square feet, and no dedicated parking. The Property is designated to be part of “Phase 3” of the build out of The Yards, together with the currently undeveloped Parcels A, F, P2a, and Q. The Project is consistent with each of these characteristics, most notably the designated uses.

B. Future Land Use Map



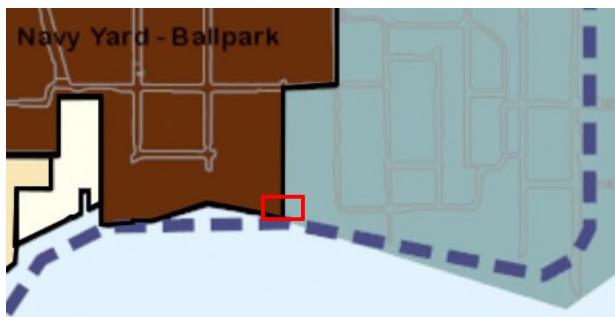
The area of Yards Park known as the P3 Parcel is split designated on the FLUM as Federal and Parks, Recreation, and Open Space. A Federal designation includes “land and facilities owned, occupied, and used by the federal government.” 10-A DCMR § 227.16. When Federal interests on any given Federal site terminate, zoning is established in a manner that is consistent with the Comp

Plan and other applicable policies. The Parks, Recreation, and Open Space designation includes both Federal and District parks and associated recreation centers. Recommended uses for this designation include a mix of passive open space and active open space.

The development of the P3 Parcel with a building containing educational, institutional, and eating and drinking uses is not inconsistent with the Parks, Recreation, and Open Space designation.

- As a threshold matter, the FLUM is not intended to be “sharp-edged” and narrowly limit the allowable uses on a parcel; rather, it is “soft-edged” and so it is appropriate to look at the adjacent land, which is in the High-Density Residential / High-Density Commercial land use category, which allows all of these uses. Indeed, large portions of Yards Park are located within this category, which further supports an overall reading that some non-recreation uses are appropriate at this location.
- Even within the framework of the Parks, Recreational, and Open Space category, the Application is consistent. The proposed uses are all uses that can help support and enhance the recreation uses in the Park, whether through experiential learning programs or park and marina-supporting food and beverage service. Again, the location of active uses within Yards Park is consistent with the overall plan for Yards Park, which is to create defined areas of development and active use within the Park.
- Perhaps most importantly, the proposed amendments condition these uses on Zoning Commission approval, which means that only uses that are compatible with and complement the recreation uses at Yards Park will be approved.

C. Generalized Policy Map



On the Generalized Policy Map, Parcel P3 is designated part of a “Regional Center.” Areas with this designation are likely to “have the largest range of commercial functions outside the Central Employment Area and are likely to have major department stores, many specialty shops, concentration of restaurants, movies, and other leisure or entertainment facilities [and] draw patrons from across the city, as well as patrons from nearby suburban area.” 10-A DCMR §225.19.

The addition of active educational and institutional uses that serve the broader region supports the continued development of The Yards as a Regional Center.

Furthermore, Parcel P3 is designated in a Resilience Focus Area. Development sites within a Resilience Focus Area are encouraged and expected to include neighborhood-wide and site-specific environmental solutions particularly with respect to flood hazard mitigations. The Applicant has elevated the Property out of the 500-year floodplain in support of these goals.

D. Area Element: Lower Anacostia Waterfront / Near Southwest Planning Area Element

The Project also advances many of the policy recommendations for the Lower Anacostia Waterfront/Near Southwest Planning Area. In particular, the Project: (i) helps with the creation of The Yards as a new mixed-use neighborhood on a formerly vacant or underutilized waterfront publicly-owned site (AW-1.1.2), (ii) is designed to be adaptive to future flood hazard conditions as evidenced by the Project's grading and stepping up and away from the river's edge (AW-1.1.5), (iii) brings commercial services, recreational amenities, cultural, job training and educational opportunities to the waterfront (AW-1.1.7, -1.1.8, -1.2.2, -1.2.3, -2.3.6), (iv) promotes pedestrian and cycling activity along the waterfront (AW-1.1.10), (v) does not create any new and breaks down existing barriers to the shoreline (AW-1.1.12, -2.3.2), (vi) is oriented to take advantage of the waterfront experience (AW-2.3.1), and (vii) celebrates the area's historic significance as a shipbuilding center with contextually appropriate architecture and maritime uses (AW-2.3.7).

E. Citywide Elements

1. Land Use

The Application will further facilitate the development of The Yards as an inclusive mixed-use neighborhood that benefits not only its immediate residents but also the broader District through both job training and skills development opportunities as well as experiential STEM educational programming. The Project will maintain a low-scale character and intensity that capitalizes on its waterfront location, which is consistent with the density- and use-balancing goals of the Land Use element.

2. Economic Development

The Project facilitates the development of several workforce readiness programs within the Living Classrooms mission, which directly furthers the Comp Plan's Economic Development goals. For example, a restaurant with culinary and hospitality training, an adult resource center and job readiness program, or an ongoing training partnership between D.C. based institutions and residents are all potential workforce development programs contemplated by the Application.

Furthermore, the Project will help expand the retail sector, neighborhood shopping opportunities, and business mix in the Yards. The Yards proximity to Metro adds to the

attractiveness of an already diverse and innovative mix of retail in the area. This expansion of uses and increased diversity will continue to draw both local and out-of-town visitors as well as contribute to amenities within the District. Ultimately, the Project will expand retail and increase participation in retail by expanding the employee base and prospective employees' trained skills, and thus further the Economic Development element.

3. Educational Facilities

The Application facilitates a use that directly furthers the “overarching goal” in the Educational Facilities element to “inspire excellence in learning; create a safe and healthy environment for students; and help each individual achieve their fullest potential while helping to build and strengthen local communities.” 10-A DCMR §1201.1. By allowing Living Classrooms to bring its mission directly to Yards Park, the District’s education goals are furthered. The Project will facilitate workforce development by offering a diverse array of educational opportunities. Additionally, allowing educational uses adjacent to the Anacostia River also creates opportunities for experiential, waterfront education opportunities unique to Yards Park.

4. Parks, Recreation, and Open Space

The Project will further several policies of the Parks, Recreation, and Open Space Element by improving accessibility to the Yards and allowing its programming to evolve to meet the needs and preferences of the community. There is a particular emphasis in the Parks, Recreation, and Open Space Element on the waterfront as an area ripe for increased foot traffic, community engagement, and recreational activities related to the water. The Application will facilitate such engagement by bringing a dynamic use to this space.

The proposed Project could be read as inconsistent with certain Parks, Recreation, and Open Space Element policies. For example, some policies underscore a desire to maintain parks as open space rather than develop those parcels. While this Application would allow development of a portion of current open space, such use permitted by the Application will activate open space along the water in a way that furthers other policies. On balance, the development is required to further other important goals for education and workforce development and, in any event, the Application only affects a small portion of Yards Park while the vast majority remains open as park space.

5. Urban Design

The Application will advance several uses in the Yards both now and in the years to come in furtherance of the Urban Design element’s waterfront priorities. Specifically, the Application’s proposed additional uses in this area adjacent to the waterfront will diversify existing experiences

in the Yards as well as create additional public space and increased waterfront access and connectivity.

The Application will allow an equitable, destination waterfront space in a structure that will expand communities served by waterfront interactivity beyond those privileged to live adjacent to the water. Additionally, the Application will promote and encourage access to the Anacostia waterfront and Yards Park as well.

6. Historic Preservation

The Project is not inconsistent with historic preservation goals that protect both the historic zone of The Yards and the adjacent Navy Yard. The design of the Project has been vetted through a series of Federal and local reviews that include preservation officials and advocates, and these reviewers have all endorsed the contextual and sensitive design of the Project.

F. Other Planning Guidance

1. *Anacostia Waterfront Initiative Framework Plan*

The AWI Plan’s “Vision” for the “Near Southeast Waterfront”, which includes the Property, seeks to “re-establish” The Yards neighborhood along the Anacostia River, into “an active, transit-oriented neighborhood with a combination of mixed-income housing, offices, retail uses, and cultural destinations [and] a network of public spaces, including parks, waterfront esplanades, and maritime piers that are linked together by the Anacostia Riverwalk.” The Project advances that overarching Vision for the Near Southeast Waterfront and in particular “Planning Principle 7”, which “Emphasize[s] mixed-use development, integrating commercial and residential areas, to form a lively and active neighborhood throughout the Near Southeast”. The Project also advances the park, low impact design, and job creation “initiatives” of the AWI Plan for the Near Southeast Waterfront neighborhood.

2. *Near Southeast Urban Design Framework Plan*

The Project is not inconsistent with relevant objectives of the NSE Plan including prioritizing access and linkage to existing parks and clustering retail uses to create a high-density urban environment in Southeast DC. The Project addresses an important linkage identified in the NSE Plan and helps link Yards Park with other public spaces and other amenities and residences. By providing additional ground floor activating uses, drawing visitors and employees to the neighborhood to support retailers, and providing job training, the Project advances the retail cluster objective of the NSE Plan.

3. Racial Equity as a Process

The Framework Element states that racial equity is, in part, a process, and that as the District grows and changes, it must do so in a way that builds the capacity of vulnerable, marginalized, and low-income communities to fully and substantively participate in decision-making processes. 10A DCMR § 213.7. As a process, a racial equity lens is employed when those most impacted by structural racism are meaningfully involved in the creation and implementation of the policies and practices that impact their lives. The Commission's Racial Equity Tool places a heavy emphasis on community outreach and engagement, which are expected to begin at the inception of any proposed zoning action. All submissions to the Commission shall be accompanied by a discussion of efforts taken by an applicant to meaningfully engage the community early in the zoning process.

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

Table 2: Community Outreach and Engagement
Description of affected community (including defining characteristics).
Characteristics of the affected community that influenced outreach plan / efforts.
<p><u>Affected Community:</u> We defined the affected community in several ways. First, we identified ANC 8F as the ANC covering the proposed site for Living Classrooms. The ANC not only covers the site but also represents the residents of the Southeast / Capital Riverfront Area. Second, we included the current users of Living Classrooms as members of the affected community. Because the proposed site and uses will ultimately benefit those who take advantage of Living Classrooms' diverse array of offerings, it's important that they are considered in outreach and engagement efforts. Third, we included residents, visitors, and employees within the Yards overall who will be closest in proximity to Parcel P3. Fourth, we have engaged in ongoing discussions with representatives of the Navy about design as well as potential synergistic program initiatives. Lastly, the Capitol Riverfront Business Improvement District is also included in the affected community because they manage Yards Park as well as support businesses along the Riverfront and adjacent to the proposed Living Classrooms' site.</p> <p><u>Defining Characteristics:</u> The defining characters of the community include its adjacency to the Anacostia Riverfront, role in the overall Master Plan for the Yards, and unique mixture of federal, residential, institutional, and educational uses.</p>
<p>The characteristics of the affected community that influenced outreach are namely the community's proximity to the Anacostia Riverfront and likelihood of using Living Classrooms' facility.</p>

Outreach methods utilized (including specific efforts employed to meet community needs and circumstances).
On-site advertisement at Parcel P3 of planned uses; presentation to ANC 8F, meetings and discussions with the Navy and the BID, and request for ongoing dialogue with community members and stakeholders.
Community outreach timeframe / dates of major meetings and points of engagement
Outreach began initially in 2018 and consisted of a series of community meetings and events at the Applicant's current space. The Applicant presented at ANC 8F's May 23, 2023 and May 20, 2025 public meetings. At the latter meeting, which was well-attended, the Applicant secured a vote of support for the text amendment related to the Application and made a presentation regarding the design of the Project.
Members of the affected community that would potentially benefit from the proposed zoning action.
Members of the affected community include nearby residents and visitors who use Yards Park, those who use the marina, and those who use Living Classrooms' diverse array of programming.
Members of the affected community that would potentially be burdened by the proposed zoning action.
Members of the affected community that would potentially be burdened include residents and those who suffer from the increased traffic, noise, and pedestrian activity stemming from Living Classrooms' programming and uses.
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.
ANC 8F members raised concerns about a lack of opportunities for youth in Southeast DC and resulting noise and quality of life issues stemming from those youth having few options for supervised activities.
Potential positive outcomes of the proposed zoning action identified by the affected community.
Educational opportunities, after-school engagement, and workforce development and employment training opportunities were identified by the community at the ANC meetings.
Potential negative outcomes of the proposed zoning action identified by the affected community.
Representatives from the Navy identified potential security sensitivities given the Project's proximity to the Navy Yard,
Changes / modifications made to the proposed zoning action that incorporate / respond to input received from the affected community.
The design and fenestration on the Project's northern and eastern facades were designed based on feedback from the Navy and in consultation with Navy employees.
Input received from the affected community not incorporated into the proposed zoning action.

The BID requested publicly accessible restrooms on the ground floor of the Project. The Applicant is unable to accommodate that request given the security protocols to be put in place for the Navy (all occupants of the building must register) and given typical safety protocols for buildings where children gather for education uses.
Efforts taken to mitigate potential negative outcomes identified by the affected community.
None at this time; Applicant will continue to engage in conversations with the community.

4. Racial Equity as an Outcome

The Framework Element states that “equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. Equity is not the same as equality” 10A DCMR 213.6. As an outcome, racial equity is achieved when race no longer determines one’s socioeconomic outcomes, and when everyone has what they need to thrive no matter where they live or their socioeconomic status. 10A DCMR § 213.9

The narrative herein correlates the Project with several equitable development indicators. Among others, the indicators set forth in **Table 3** on the next page and addressed in this analysis include those that are specifically included in **Part IV (Criteria to Evaluate a Zoning Action through a Racial Equity Lens)** of the Commission’s Racial Equity Tool. It is unlikely that the Project will result in displacement or affect housing. Conversely, the Project may facilitate job creation, increased use of public space, and access to opportunity in the District.

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 Outcome	
Displacement						
Physical (Direct)		None. The Property is vacant.			●	
Economic (Indirect)		None. Indirect displacement of tenants or homeowners is not expected to occur in the area surrounding the Property.			●	
Cultural (Indirect)		None. The Project supports the maintenance of social connections within the existing Southeast community.			●	
Housing						
Availability of Housing		None. The Project does not include housing.			●	
Preservation of Affordable Housing		None.			●	
Replacement Housing		None.			●	

Housing (continued)		
Housing Burden	None.	●
Larger Unit Size	None.	●
Employment		
Entrepreneurial Opportunities	The Project expressly includes job training facilities and services in an industry, the hospitality industry, with high levels of entrepreneurialism.	●
Job Creation	The Project is expected to create some new job opportunities.	●
Job Training	The Project expressly includes job training facilities and services.	●
Access to Employment	The Project provides new job opportunities and training near transit.	●
Transportation / Infrastructure		
Public Space / Streetscape Improvements	The Project improves a vacant, underutilized site near Yards Park.	●
Infrastructure Improvements	None.	●
Access to Transit	The Project improves access to and along a major cycling thoroughfare.	●
Pedestrian Safety	The Project enhances pedestrian connectivity through and to Yards Park.	●
Education / Health / Wellness		
Schools	The Project expressly includes education uses and opportunities for experiential learning for DC children.	●
Healthcare	None.	●
Open Space / Recreational	The Project enhances the existing Yards Park and Yards Marina and provides marina-supporting spaces.	●
Environmental		
Environmental Changes	The Project adds improved on-site storm water management and native species vegetation	●
Sustainable Design	The Project is transit-oriented and bicycle oriented with no vehicular parking.	●
Resilient Design	The Project is elevated out of the 500-year floodplain to avoid flooding impacts.	●

Remediation	Any remediation that is required will be carried out in accordance with DOEE requirements.	●
Access to Opportunity		
Neighborhood Retail and Service Uses	The Project contains ground level eating and drinking establishment uses intended to serve The Yards neighborhood and the Navy Yard.	●
Residential Amenities	None. The Project does not include housing.	●
Arts & Culture	The Project provides indoor and outdoor gathering spaces, including an outdoor classroom and outdoor plazas for a variety of educational and cultural programming.	●

APPENDIX: List of Policies Advanced and Supported by the Application

AW-1.1: Guiding Growth and Neighborhood Conservation

- AW-1.1.2: New Waterfront Neighborhoods: Create new mixed-use, mixed-income neighborhoods on vacant or underused waterfront lands, particularly on large contiguous publicly owned waterfront sites. Within the Lower Anacostia Waterfront/Near Southwest Planning Area, new neighborhoods should continue to be developed at the Southwest Waterfront, Buzzard Point, Poplar Point, and Navy Yard/Capitol Riverfront. These neighborhoods should be linked to new neighborhoods upriver at Reservation 13, and Kenilworth-Parkside via trails, additional water recreation opportunities, and improved park access points along the Anacostia shoreline. A substantial amount of new housing and commercial space should be developed in these areas, reaching households of all incomes, types, sizes, and needs. Opportunities for grid interconnected neighborhood-scale energy utilities systems as part of the development of these areas should be evaluated, using renewable energy sources to provide greater environmental benefits for the community. The new waterfront neighborhoods should integrate new parks and amenities, enhance public access to the waterfront, and incorporate resilient design to mitigate flooding.
- AW-1.1.7: Waterfront Area Commercial Development: Encourage commercial development in the waterfront area in a manner that is consistent with the Future Land Use Map. Such development should bring more retail services and choices to the Anacostia waterfront, as well as space for government and private sector activities, such as offices and hotels. A mix of high-density commercial and residential development should be focused along key corridors, particularly along Maine Avenue and M Street SE and SW, along South Capitol Street, and near the Waterfront and Navy Yard Metro stations. Maritime activities, such as cruise ship operations, should be maintained and supported as the waterfront redevelops.
- AW-1.1.8: Waterfront Development Amenities: Leverage new development in the Waterfront Planning Area to create amenities and benefits that serve existing and new residents. These amenities should include parks, job training and educational opportunities, new community services, and transportation and infrastructure improvements.

AW-2.3: Near Southeast / Capitol Riverfront

- AW-2.3.6: Near Southeast / Capitol Riverfront Urban Amenities: Leverage new and existing developments in the Near Southeast/Capitol Riverfront area to create amenities, such as parks, trails, child-care facilities, civic uses, and retail space, that serve the area's residents and workforce. Encourage the redesign of Virginia Avenue Park into a more inviting park and green space that supports a wide range of users of all ages and abilities.

LU-1.2: Strengthening the Core

- LU-1.2.3: Appropriate Uses in the CEA: Ensure that land within the CEA is used in a manner which reflects the area's national importance, its historic and cultural significance, and its role as the center of the metropolitan region. Federal siting guidelines and District zoning regulations should promote the use of this area with high value land uses that enhance its image as the seat of the national government and the center of Washington, DC and that make the most efficient possible use of its transportation facilities. An improved balance in the mix of uses will help to achieve Washington, DC's aspiration for an even larger living downtown. Both the District and Federal Elements include a joint federal/District designation of a Central Employment Area (CEA) within Washington, DC. The CEA includes the existing core of federal facilities, such as the U.S. Capitol Building, the White House, as well as the Supreme Court, and most of the legislative, judicial, and executive administrative headquarters of the United States government. The CEA is the District of Columbia's commercial core where the greatest concentration of employment is encouraged. Additional Federal Employment Areas, such as Parkside, are located in other parts of the District. Federal Employment Areas are also part of the GSA point system used to establish federal leases.
- LU-1.2.4: Urban Mixed-Use Neighborhoods – Near Southeast / Navy Yard: The location of these areas is shown in the Central Washington, and Lower Anacostia Waterfront/Near Southwest Area Elements. Land use regulations and design standards for these areas should require that they are developed as attractive pedestrian-oriented neighborhoods, with high quality architecture and public spaces. Housing, especially affordable and deeply affordable housing, is particularly encouraged and must be a vital component of the future land use mix. As areas continue to redevelop, community engagement and actions shall be undertaken to retain existing residents, particularly communities of color and vulnerable populations, and enable them to share in the benefits of area redevelopment while addressing adverse short- and long-term impacts.

LU-2.3: Residential Land Use Compatibility

- LU-2.3.5: Institutional Uses: Recognize the importance of institutional uses, such as private schools, childcare facilities, hospitals, churches, and similar uses, to the economy, character, history, livability, and future of Washington, DC and its residents. Ensure that when such uses are permitted in residential neighborhoods, their design and operation is sensitive to neighborhood issues and neighbors' quality of life. Encourage institutions and neighborhoods to work proactively to address issues, such as transportation and parking, hours of operation, outside use of facilities, and facility expansion.

LU-2.4: Neighborhood Commercial Districts and Centers

- LU-2.4.3: Regional Centers: Support and enhance the District's regional commercial centers to help serve area shopping needs that are not met downtown. Permit the District's two established regional commercial centers, at Georgetown and Friendship Heights, to develop and evolve in ways that are compatible with other land use policies, including those for accommodating population growth and increasing affordable housing, especially along corridors; strengthening commercial vitality; maintaining established neighborhoods; mitigating negative environmental impacts; strengthening transit options; managing parking; and minimizing adverse transportation impacts. Promote equitable access to regional shopping by encouraging the continued development of the emerging regional centers at Minnesota-Benning and Hechinger Mall in a manner that is consistent with other policies, including those noted above, in the Comprehensive Plan.

ED-2.2: The Retail Economy

- ED-2.2.1: Expanding the Retail Sector: Pursue a retail strategy that will allow the District to fully capitalize on the spending power of residents, workers, and visitors, and that will meet the retail needs of communities across the District and particularly in underserved communities
- ED-2.2.3: Neighborhood Shopping: Create and support additional shopping opportunities in Washington, DC's neighborhood commercial districts to better meet the demand for basic goods and services. Reuse of vacant buildings in these districts should be encouraged, along with appropriately scaled retail infill development on vacant and underused sites. Promote the creation and growth of existing locally owned, nonchain establishments because of their role in creating unique shopping experiences, as well as in generating stronger local supply chains that facilitate community wealth building.
- ED-2.2.5: Business Mix: Reinforce existing and encourage new retail districts by attracting a mix of businesses, including local companies, regional chains, and nationally recognized retailers.
- ED-2.2.8: Innovative Retail: Identify and implement innovative retail strategies. This could include supporting pop-up or mobile retailers in neighborhoods with insufficient or unproven market demand for new stores. These strategies can help new businesses become established, or introduce new products and concepts, provide seasonal merchandise and services, and fill commercial buildings during short term vacancies.

ED-2.3: The Tourism and Hospitality Economy

- ED-2.3.2: Visitor Attractions: Encourage new and enhanced visitor attractions and entertainment venues in the District, particularly attractions that complement the traditional museums and monuments and draw more international visitors and young adults to

Washington, DC. New attractions should create a clear identity for the District as the region's major entertainment center

- ED-2.3.3: Amenities Beyond the Mall: Promote the development of cultural amenities beyond the Mall in an effort to more fully capitalize on and distribute the economic benefits of tourism.
- ED-2.3.9: Hospitality Workforce Development: Recognize the potential for the hospitality sector to generate entry-level jobs and opportunities for upward mobility for District residents by promoting career and job training and job placement initiatives in this sector, and by working with local hotels, the District of Columbia Hotel Association, the Washington Convention and Tourism Corporation, unions, and others.
- ED-2.3.10: Waterfront Destinations: Promote the Anacostia and Potomac waterfronts as destinations for District residents and visitors in an effort to capitalize on the amenities and economic benefits of tourism in neighborhoods adjacent to the rivers.

ED-4.2: Increasing Workforce Development Skills

- ED-4.2.1: Linking Residents to Jobs: Promote measures that increase the number of District jobs held by District residents. According to the Census Bureau's Longitudinal Employer-Household Dynamics Program, 67 percent of the jobs in the District were held by nonresidents in 2016. While recognizing that some imbalance is inevitable due to the relatively large number of jobs and small number of residents in Washington, DC, the District should work to increase the percentage of resident workers through its job training and placement programs.
- ED-4.2.2: Linking Job Training to Growth Occupations: Target job training, placement, and career programs toward core and growth sectors and occupations, such as hospitality, information technology, health care, construction, home health aides, and computer user support specialists. Seek opportunities to link the pipeline of potential employees from workforce development programs to small, locally owned businesses.
- ED-4.2.3: Focus on Economically Disadvantaged Populations: Focus workforce development efforts on economically disadvantaged communities, including communities of color, and particularly those with many unemployed or marginally employed residents. Assistance should also be focused on groups most in need, including persons with limited work skills, the LGBTQ+ community, persons with disabilities, single mothers, youth leaving foster care, returning citizens, and persons with limited English proficiency.
- ED-4.2.4: Neighborhood-Level Service Delivery: Emphasize the delivery of workforce development programs at the neighborhood level. Continue neighborhood faith-based and community based initiatives that deliver job training and placement services to unemployed and underemployed residents. Consider programs that align with Business Improvement Districts' clean and safe teams.

- ED-4.2.5: Business and Labor Partnerships: Facilitate communication and partnerships between business, labor, commercial associations, and educational institutions to improve the skill levels of the workforce, improve job training and placement resources, and improve the labor pool available to major employers. These partnerships could result in apprenticeship programs, pre-apprenticeship programs, entrepreneurial skills training, mentorship agreements, customized on-site job training, and career training.
- ED-4.2.6: Entry Level Opportunities: Support the creation of entry-level career opportunities, particularly for low income youth and adults, and persons with disabilities. Recognize the need for complementary efforts to provide affordable child care options, transportation, counseling, and other supportive services.
- ED-4.2.7: Living-Wage Jobs: Promote the attraction and retention of living-wage jobs that provide employment opportunities for unskilled and semi-skilled workers. Use marketing strategies and performance-based incentives to encourage the relocation of firms with such positions to the District.
- ED-4.2.9: Upward Mobility: Encourage continuing education and career advancement programs to provide opportunities for upward mobility among the District's workforce. Encourage the growth of businesses that have been shown to provide career advancement opportunities for employees.
- ED-4.2.11: Innovation in Training: Support innovative training strategies to fill skill gaps in the local labor force, including partnerships with the private sector, industry associations, and individual government agencies. Examples of such strategies include the Cadet Training Program of the DC Fire and Emergency Medical Services Department, the DC Infrastructure Academy, and trade organization apprenticeship programs.

EDU-3.2: Educational Partnerships

- EDU-3.2.3: Workforce Development: Strengthen connections among educational programs, skills training, and workforce development initiatives to support development of career pathways and prosperity for all.

PROS-1.3 Closing the Gaps

- Policy PROS-1.2.2: Improving Accessibility: Improve accessibility to and within the major park and open space areas through pedestrian safety and street crossing improvements, wayfinding signage, bike lanes and storage areas, perimeter multiuse trails within select parks, and adjustments to bus routes where appropriate. All parks should be accessible by foot, and most should be accessible by bicycle. Seek to provide access within parks for all ages and abilities consistent with park use and recognize that paved trails are accessible to wheelchair users, whereas dirt, cinder, and wood chip trails can present challenges for these users.

- Policy PROS-1.2.3: Responding to Community Change: Update and improve existing parks in response to changing demographics, cultural norms, and community needs and preferences. Parks should reflect the identity and needs of the communities they serve. Further, the parks and recreation system should evolve to offer a variety of facilities located within a reasonable distance of each resident and provide a range of programs in spaces designed to flex as residents' needs and interests change.
- Action PROS-1.2.B: Public Involvement: Consult with Advisory Neighborhood Commissions (ANCs) and local community groups on park planning and development to understand and better address resident priorities.

PROS-1.3 Preserving the Value of Parkland

- Policy PROS-1.3.1: Balancing Competing Needs: Manage the District's parklands to preserve and enhance their open space character while also accommodating a range of recreational, educational, and environmental functions. Park activities and facilities should be designed in a way that makes the best possible use of each space while minimizing conflicts between different recreational uses.
- Policy PROS-1.3.4: Conversion of Parkland/Open Space: Preserve the basic function of District parks as public open spaces and prevent parkland conversion to other uses. On select park sites with active uses, complementary uses, such as concessions, may be considered as a way to generate the revenue needed to sustain and modernize recreation facilities and further activate such spaces.
- Policy PROS-1.3.6: Compatibility with Adjacent Development: Design and manage park activities and facilities, including recreation centers, in a way that is compatible with nearby residential and commercial uses.
- Policy PROS-1.3.8: Multipurpose Infrastructure: Design parks and recreational facilities with infrastructure to serve multiple purposes, including flood risk reduction, urban heat island mitigation, and stormwater management.

PROS-2.1 Assessing Recreational Facilities

- Policy PROS-2.1.3: Quality and Compatible Design: All park improvements should be of high design and construction quality, sensitive to the natural environment, respectful of historic structures and important cultural landscapes, sensitive to the needs of people of all ages and abilities, and compatible with surrounding land uses.
- Policy PROS-2.1.5: Adapting to Changing Needs: Allow the development of flexible facilities that respond to changing preferences and community needs in appropriate District parks, including dog parks, skate parks, tot lots, and water spray parks.

PROS-2.2 Providing Quality Service to All Residents

- Policy PROS-2.2.3: Program Diversity: Provide diverse recreational activities to promote healthy living for persons of all ages and cultural backgrounds. Such activities must be distributed equitably in all parts of the District. Coordinate activities and offerings with other service providers, including DCPS and community-based organizations such as wellness centers for older persons, to maximize the effectiveness of service delivery and minimize redundancy.
- Policy PROS-2.2.5: Youth Recreational Services: Provide recreational services that are particularly responsive to the special needs of the District's youth, using recreation and athletics to promote self esteem, responsibility, and leadership skills among youth.

PROS-3.2 Reclaiming the Waterfront

- Policy PROS-3.2.1: Preserving Waterfront Open Space: Recognize the importance of Washington, DC's waterfronts for recreation, public access, ecological protection, and scenic beauty.
- Policy PROS-3.2.3: Linking Residents to Waterfront Park Spaces: Establish stronger multimodal linkages between the waterfront and adjacent upland neighborhoods, including Deanwood, Mayfair, Kenilworth-Parkside, River Terrace, Fairlawn, Twining, Kenilworth, Historic Anacostia, Carver-Langston, Kingman Park, Hill East, Capitol Hill, Barney Circle, Southwest, and Buzzard Point. Maximize public access to the waterfront from these areas through the development of a continued riverwalk and shoreline trail, natural shorelines, green infrastructure along streets, improved public transportation, redesigned bridges and freeways, additional pedestrian access routes, and the extension of neighborhood streets and avenues to the water's edge.
- Policy PROS-3.2.4: Waterfront Visibility and Accessibility: Improve access to the shoreline parks from across Washington, DC, and reduce barriers to waterfront access created by railroads, freeways, and non-water-dependent industrial uses. However, no freeway or highway removal shall be undertaken prior to the completion of an adequate and feasible alternative traffic plan that has been approved by the District government.
- Policy PROS-3.2.5: Water-Oriented Recreation: Provide for a variety of water-oriented activities—including fishing, boating, kayaking, and paddle-boarding—on the District's rivers. Recognize both the Anacostia and Potomac rivers as vital aquatic resources that can accommodate kayaking, canoeing, sculling, fishing, and other forms of water-oriented recreation.

UD-1.3 Designing the Waterfront for the Next Century

- Policy UD-1.3.1: Diverse Waterfront Experiences along the Anacostia River: Strengthen Washington, DC's civic identity as a waterfront city by promoting public and private

investment along the Anacostia River waterfront and creating equitable and publicly accessible amenities for existing and new residents. Design a mix of new public parks and other natural areas to provide diverse waterfront experiences and help residents use the water as a community asset through programming and recreational amenities. Create continuous public access along both sides of the shoreline, integrate historic features and structures into new developments, preserve or restore habitat areas, and implement other design interventions to improve the physical and visual connections between the waterfront and adjacent neighborhoods.

- Policy UD-1.3.2: Waterfront Public Space: Develop public gathering spaces along the Potomac and Anacostia waterfronts, including promenades, viewpoints, boating and swimming facilities, and parks. Such space should be designed to promote continuous public access along the rivers and to take full advantage of site topography and waterfront views. Design treatments should vary from hardscape plazas in urban settings to greener open spaces that are more natural in character, and spaces that provide access to outdoor recreation. Encourage the density and mix of land uses that enliven waterfront sites with pedestrian activity, provide a sense of safety, create visual interest, and draw people to the water.
- Policy UD-1.3.6: Waterfront Access and Connectivity: Improve the physical connections between neighborhoods and nearby waterfronts. Where feasible, extend the existing urban grid into large waterfront sites to better connect nearby developed areas to the shoreline. Greater access to the waterfront should also be achieved by reconfiguring roadways and other infrastructure along the waterfront to reduce access impediments for neighborhoods with limited access, and for pedestrians and bicyclists. Provide a consistent design treatment for waterfront trails.

HP-2.5 Review of Rehabilitation and New Construction

- Policy HP-2.5.3: Compatible Development: Preserve the important historic features of the District while permitting compatible new infill development. Within historic districts, respect the established form of development as evidenced by lot coverage limitations, height limits, open space requirements, and other standards that contribute to the character and attractiveness of those areas. Ensure that new construction, building additions, and exterior changes are in scale with and respect their historic context through sensitive siting and design, and the appropriate use of materials and architectural detail.