

EXHIBIT H
**EVALUATION OF COMPREHENSIVE PLAN
AND RACIAL EQUITY ANALYSIS**

This Exhibit H describes how the proposed PUD modification is not inconsistent with the Comprehensive Plan (the “**Comp Plan**” or “**Plan**”) and advances a number of Comp Plan policies, including when viewed through a racial equity lens. The proposed university use, a matter-of-right use in the D-5 Zone, is consistent with the District’s land use vision for this area. The University, as a strong community partner, will transform this underutilized property and refresh its stature while simultaneously providing a customer base to the surrounding businesses.

As described further below, the Project furthers the racial equity goals of the Comp Plan by avoiding displacement and improving access to opportunity. The University first established its Office for Diversity, Equity and Community Engagement in 2010 and maintains a strong commitment to ensuring diversity in their student body, faculty, and staff. GW continues to value and include people from different cultures, backgrounds and perspectives in the pursuit of our common goals.¹ The Project will improve access to opportunity for this diverse student population by bringing students closer to the heart of the downtown commercial corridor and all of the opportunities that proximity entails. The University is contemplating relocation of its career center to the ground floor of the Property which would bring together students and prospective employers, facilitating the access this location offers. In addition, the Project will result in no displacement. The University plans to keep all existing tenants in place until the natural expiration of their leases.

The University has already had substantial engagement with the affected community, presenting the Application to the university-community task force, the Campus Plan Advisory

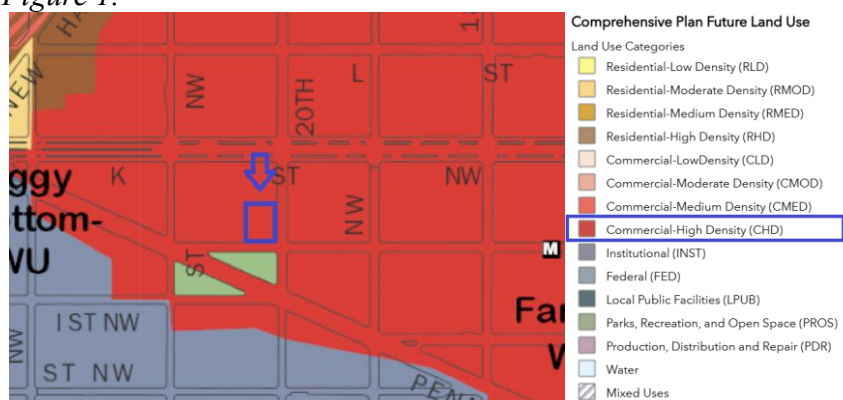
¹ Diversity and Inclusion, GW Human Resource Management & Development, available at <https://hr.gwu.edu/diversity-and-inclusion-0>

Committee (“CPAC”), ANC 2A, and ANC 2C. In addition, the University has had discussions about the Application with the West End Citizens Association (“WECA”) and neighboring property owners.

Through the extensive community engagement, the access to opportunity, and the lack of displacement, the Project furthers the racial equity goals of the Comp Plan.

FUTURE LAND USE MAP

Figure 1.

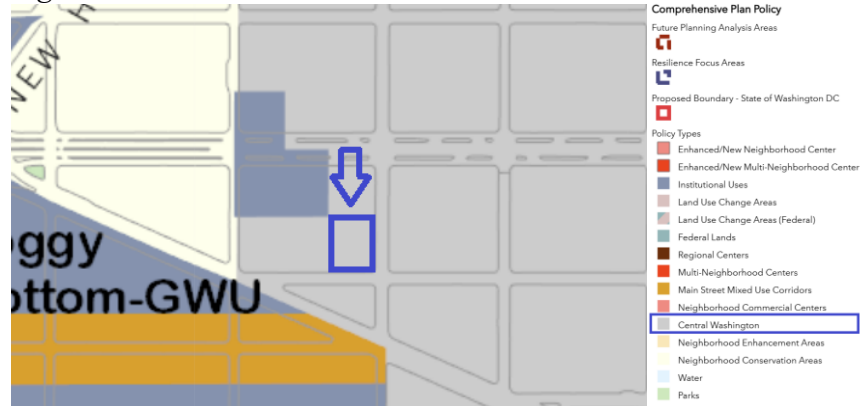


As shown on *Figure 1* above, the Property is located in the High Density Commercial category on the Comp Plan’s FLUM. The High Density Commercial category defines the central employment district and other major office and commercial areas. Office and mixed office-retail buildings are the predominant use, although lower scale buildings are also interspersed. § 227.13.

The Building is a high density mixed office-retail building. With both office and retail uses suffering major vacancies in downtown, the Project will revitalize the currently underutilized Building with university use that will operate similarly to office use and provide an uptick in pedestrian traffic to and from the Property, helping to support the surrounding businesses.

GENERALIZED POLICY MAP

Figure 2.



The Property is located within the Central Washington area on the GPM, as shown on *Figure 2*. The GPM points to the Central Washington Area Element for guidance on how this GPM category should be considered. § 225.22. As described in detail above, the Project furthers the Central Washington Area Element goals by strengthening the economic opportunities both for the University and the surrounding neighborhood and enhancing the academic identity of downtown with the upper-story signage.

AREA AND CITYWIDE ELEMENTS

Table 1 below identifies specific Comp Plan policies advanced by the proposed PUD modification. The table is followed by a brief narrative addressing each applicable Comp Plan element.

Table 1: Summary of Comp Plan Policies Advanced by the Proposed PUD Modification
Central Washington Area Element
CW-1.1.3, CW-1.1.20, CW-1.2.1, CW-1.2.5, CW-2.1.4, , CW-2.6.1, CW-2.6.2
Land Use Element
LU-1.2.1, LU-1.2.2, LU-1.2.3, LU-2.3.5, LU-3.3.2
Urban Design Element
UD-1.1.1, UD-1.4.1, UD-1.4.2, UD-2.2.3, UD-4.2.5, UD-1.4B

Economic Development Element
ED-1.1.1, ED-1.1.2, ED-2.4.1, ED-2.4.2, ED-3.1.1, ED-3.1.8, ED-4.2.1, ED-4.2.2
Educational Facilities Element
EDU-3.2.2, EDU-3.2.3, EDU-3.2.4, EDU 3.3.2, EDU-3.3.10

Central Washington Area Element

The Central Washington Element discusses attracting non-office uses, including educational uses, to enhance the identity of neighborhoods and create a vibrant downtown neighborhood. § 1608.4. The Element focuses on several design strategies for the area, including improving signage, in an effort to attract tourists downtown. §§ 1607.3, 1608.21. The Area Element also encourages programs that will maximize economic opportunities, connecting District residents to jobs and programs that assist small and minority businesses. § 1609.5. The University is exploring potentially relocating its career center in the ground floor which would benefit the District by improving economic opportunities for students and businesses alike and reflects the important contribution of the University to downtown.

The proposed university use and signage will enhance the neighborhood’s identity as an educational center. The University is intertwined with the West End and an integral part of the area’s identity. The Project will further the goals of the Central Washington Area Element by contributing to a cohesive visual identity for the Foggy Bottom/West End neighborhood. As the Comp Plan notes, signage can help contribute to an area’s sense of place. *See* § 1611.9.

As the Golden Triangle/K Street NW Policy Focus Area notes, this area is mostly built out, but many buildings have seen elevated vacancy rates since the Great Recession. The Plan discusses the opportunity to introduce new uses and to improve street-level activity. § 1616.4. Golden Triangle should be a “prestigious employment center, strongly supporting reinvestment in its office buildings to meet market demand.” §1616.7. The University has reinvested in an aging, partially

vacant office building and plans to meet market demands by converting that vacant space into active uses.

Land Use Element

The Land Use Element emphasizes the importance of institutional uses which “make an important contribution to the District economy and are an integral part of Washington, DC’s landscape and history.” § 317.4. As corporate citizens, universities should be “role models” in their efforts to improve the physical environment. The Property is located within the Central Employment Area (“CEA”) where the District is focused on continued reinvestment. Appropriate uses within the CEA reflect the area’s national importance, historic and cultural significance, and its role as the center of the metropolitan region.

The University plans to adaptively reuse a partially vacant building on an important corner of downtown. The university use, including a potential career center, will improve the physical environment and support surrounding businesses. The renewed vitality of the corner will contribute to transforming the District’s core into a “lively, connected urban center.” § 305.1. The signage is appropriate in the context of downtown and adjacent university campus. The upper-story signage, complementing the adjacent Pepperdine University sign, marks the importance of university use to the character of the District.

Urban Design Element

The Urban Design Element discusses the importance of strengthening and enhancing the physical character of the District in a way that reflects its “role as the national capital and its distinctive identity as a thriving urban community.” §903.9. The Comp Plan encourages design of the District’s main thoroughfares, such as Pennsylvania Avenue, to reinforce the identity of the District and to make a strong visual impact. §§ 906.3, 906.9. In addition, the Element discusses

“enhancing points of arrival into the District” through signage. §§ 906.14, 911.7. “Universal wayfinding” should showcase the character of various neighborhoods. § 911.7.

Signage has a dual purpose of aiding navigation and establishing identity. Here, the Property is located on an important District avenue and in a neighborhood characterized by both its university use and the District’s main office market. The signage will serve both a wayfinding purpose for District visitors and contribute to the intellectual identity of the neighborhood. In addition, the proposed signage will help draw visual interest to the Building’s dynamic roof line, which features three tower projections at the center. By enhancing this unique roof line, the proposed signage will also further the Urban Design Element goal of encouraging interesting roof lines. *See*. § 918.8.

Economic Development Element

Educational services is one of the top four industries that collectively have produced more than 80 percent of new private sector jobs in the District since 2004. §§ 702.5. 703.6. George Washington University is one of the top two largest private employers. § 710.1. Supporting university use as a core industry “facilitates future growth that strengthens the District’s competitive advantage.” § 703.2.

The Comp Plan encourages supporting higher education growth, recognizing the important economic benefit universities provide to the District. The Comp Plan also recognizes the secondary benefits of university use in the importance of the strong customer base universities create that support neighborhood commercial vitality.

It is no secret that downtown D.C. is suffering from a negative economic trend due to the surplus of vacant office and retail spaces. For the second quarter of 2025, CBRE data shows a

22.6% office vacancy rate in the District.² The Economic Development Element notes that historically, the federal government has driven the District's growth, but looking forward, the private sector will be instrumental in continuing that growth. § 705.1. Given the events of the past year, that truth is more on point than ever. The University will continue to play an integral role in the District's growth.

The Project will continue to support the District economically through reactivating the Property with a solid customer base that will support the surrounding businesses. The potential career center use will help link students to District jobs, another goal of the Economic Development Element.

Educational Facilities Element

The Educational Facilities Element discusses the importance of universities to the District and their role as community partners, calling for university growth that is consistent with community improvement and neighborhood conservation. § 1214.7. In particular, the Plan encourages universities to connect students with local communities to strengthen “town-gown relationships.” §1213.5. With respect to the physical environment the University's corporate citizenship should include a commitment to high-quality architecture and the adaptive reuse of historic buildings. § 1213.3.

The University continues to be a strong community partner and the Project will contribute to neighborhood conservation by refreshing an underutilized Building and providing a customer base for the nearby businesses. The potential career center use will also support the workforce development initiatives encouraged by the Comp Plan. The University is committed to improving

² Ben Peters, *D.C. Office Vacancy Stagnates as Federal Lease Terminations Offset Gains*, WASHINGTON BUSINESS JOURNAL (July 1, 2025), <https://www.bizjournals.com/washington/news/2025/07/01/dc-office-vacancy-rate-cbre-jll-federal-leases.html>.

the District’s physical environment. As discussed above, the proposed signage will contribute to the neighborhood’s academic identity and also draw visual interest to the unique tower projections at the top of the Building. The proposed university use is also consistent with the District’s plan for the neighborhood. University use is a by-right use in the D-5 Zone, making the proposed modification consistent with the zoning and the District’s vision for this area.

The University continues to meet with CPAC, a University-Community Task Force, and representatives of the University have already given presentations on the Application to CPAC on June 16, 2025.

RACIAL EQUITY ANALYSIS

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. The analysis below 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, 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 change in use from office and retail to university and the proposed signage.

Racial Equity as a Process

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 already engaged and will continue to engage with the community during the PUD process.

Table 2: Community Outreach and Engagement
Description of affected community (including defining characteristics).
The Approved PUD is located in the West End/Foggy Bottom neighborhood. The affected community includes the University and its students and the predominant office and retail uses in the surrounding area.
Characteristics of the affected community that influenced outreach plan / efforts.
The Applicant has engaged with CPAC, both “Affected ANCs,” ANC 2A and ANC 2C, the other property owners that were parties to the original Approved PUD, and WECA.
Community outreach timeframe / dates of major meetings and points of engagement
<p>The Applicant met with the CPAC on June 16, 2025. The Applicant also presented at a regularly scheduled monthly meeting to ANC 2A on July 16, 2025 and to ANC 2C on June 10, 2025.</p> <p>In addition to these presentations, representatives of the Applicant have been in touch with WECA to discuss the Application. The Applicant has also met with The Arts Club of Washington, owner of the Arts Club Building that was part of the original Approved PUD. The Applicant reached out to Pepperdine University and they are fully supportive of this Application.</p>
Members of the affected community that would potentially benefit by the proposed zoning action.
<ul style="list-style-type: none"> • The neighboring retail that will benefit from the increased activity at the Property and additional clientele. • The students that will benefit from academic space in closer proximity to the businesses offering internship opportunities along K Street and Pennsylvania Avenue. • The business community that will benefit from the proximity of prospective student interns and future employees.
Members of the affected community that would potentially be burdened by the proposed zoning action.
Although the increase in pedestrian activity anticipated with the Project would benefit the surrounding businesses, some community members may prefer the status quo of lighter foot traffic.
Potential positive outcomes of the proposed zoning action identified by the affected community.
The community has expressed a desire for some community partnership use of the ground floor. The University is currently exploring the possibility of relocating its career center in the ground floor which would mutually benefit the students searching for internships or post-graduation jobs and the surrounding business community searching for future employees.

Potential negative outcomes of the proposed zoning action identified by the affected community.
Members of the community have expressed concern with the loss of ground floor retail space and the illumination of the upper story signage. However, the majority of the ground floor retail space has been vacant since 2023 and the University plans to retain the coffee shop space as designated retail. Illumination of the upper story signage should not have any negative effects as there are no residential buildings in close proximity to the Property.
Changes / modifications made to the proposed zoning action that incorporate / respond to input received from the affected community.
In response to feedback from the community, the University has revised the proposed signage both in size and location. The University has also committed to keeping the current coffee shop space designated for retail use and only requests the flexibility for university use in the remainder of the ground floor. The affected community also expressed a desire for the ground floor university use to be one that allows for more interaction with the surrounding community. Therefore, the University is exploring the possibility of relocating its career center in that space.
Input received from the affected community not incorporated into the proposed zoning action.
<p>The affected community has expressed a desire to maintain the entirety of the ground floor as retail use. As described in further detail in the Statement, the surrounding area has experienced unprecedented retail vacancies. In all likelihood, the currently vacant ground floor retail will remain vacant, resulting in no benefit to the affected community. Therefore, the University has not incorporated that feedback into the Application.</p> <p>In addition, the affected community has expressed concern regarding the nighttime illumination of the upper-story signage. The Applicant notes that the nearby WilmerHale sign is illuminated at night and the Applicant is unaware of any negative effects or concern in the community with that signage. Because the Property is located away from residential uses, the illumination should not have any detrimental effects.</p>
Efforts taken to mitigate potential negative outcomes identified by the affected community.
The loss of retail identified by the affected community will be offset by the strong customer base that will support the existing retail in the surrounding area, helping to ensure that more retail does not close.

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. Most racial equity impacts of the proposed PUD modification are largely anticipated to be neutral as they relate to racial equity.

Table 3: Evaluation of Zoning Action Through a Racial Equity Lens	
Direct Displacement	The proposed PUD modification will not cause any commercial displacement in the near term. The University intends to use the vacant office and retail space within the Building for university use and expand that use as the existing leases expire.
Indirect Displacement (Economic and Cultural)	The proposed PUD modification will not lead to indirect economic or cultural displacement. Rather, the new university patrons will support the surrounding retail.
Housing	N/A
Physical	The new signage will attract visual interest to the dynamic design of the Building’s roofline. The reactivation of the mostly vacant ground floor retail will result in more pedestrian activity and refresh the prominent downtown corner.
Access to Opportunity	The proposed PUD modification will offer students with closer access to the District’s business community.
Community	The Applicant has made presentations to ANC 2A, ANC 2C, and CPAC. In addition, the Applicant has been in contact with the Arts Club of Washington and Pepperdine University, the two other PUD parties, and WECA.