

Exhibit H

Evaluation of Consistency with the Comprehensive Plan and Other Adopted Policies

In review of an application for mandatory design review, 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 Revised 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.

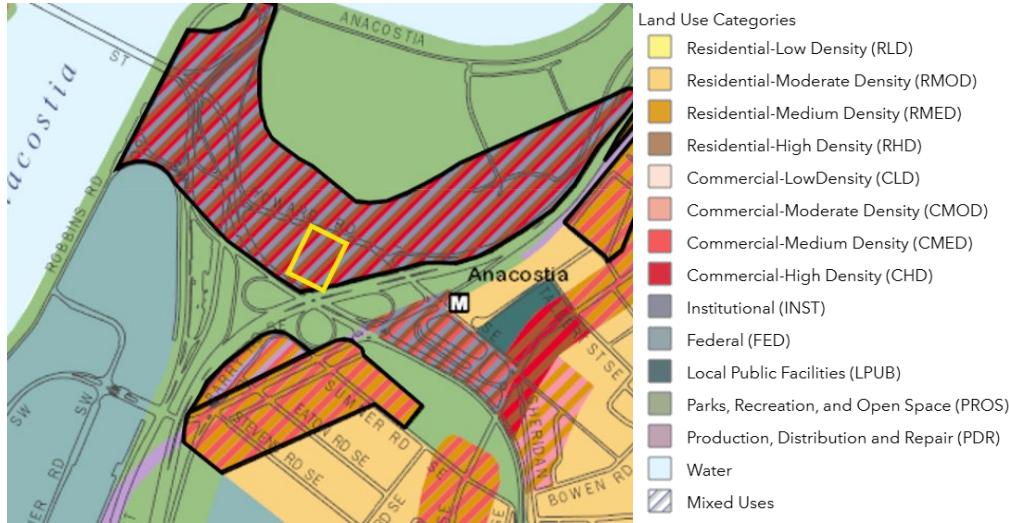
Table 1: Summary of Comprehensive Plan Policies Advanced by the Revised Project	
Policies in <u>bold underlined</u> text denote policies that are specifically referenced in the OP Equity Crosswalk as being explicitly focused on advancing equity.	
Land Use Element: LU-1.4.2, LU-1.4.4, LU-1.4.8, LU-2.1.2, LU-2.1.3, LU-2.1.12	
Transportation Element: T-1.1.4, T-1.3.1, T-2.3.2	
Environmental Protection Element: E-1.1.2, E-2.1.3, E-3.2.7, E-4.1.2, E-7.1.3	
Urban Design Element: UD-2.2.1, UD-2.2.5, UD-2.2.6, UD-4.1.1, UD-4.2.4	
Education Facilities Element EDU-1.3.1, EDU-1.3.2, EDU-1.5.1, EDU-1.5.3, EDU-1.5.4, EDU-1.5.5, EDU-1.6.3, <u>EDU-2.1.2</u> , EDU-2.2.1, EDU-2.2.2	
Lower Anacostia Waterfront/Near Southwest Area Element: AW-1.1.5, AW-2.4.3, AW-2.4.5, AW-2.4.7, AW-2.4.8	

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 FLUM designates the Property for a mix of uses including “High Density Residential,” “High Density Commercial,” and “Institutional.” A mixed-use categorization is applied to “areas where the mixing of two or more land uses is especially encouraged,” including “[c]ommercial corridors or districts which may not contain substantial amounts of housing today, but where more housing is desired in the future.” 10A DCMR § 227.20.



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.
- **Institutional:** This designation includes land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions. While included in this category, smaller institutional uses such as churches are generally not mapped, unless they are located on sites that are several acres in size. Zoning designations vary depending on surrounding uses.

Institutional uses are also permitted in other land use categories. 10A DCMR § 227.18.

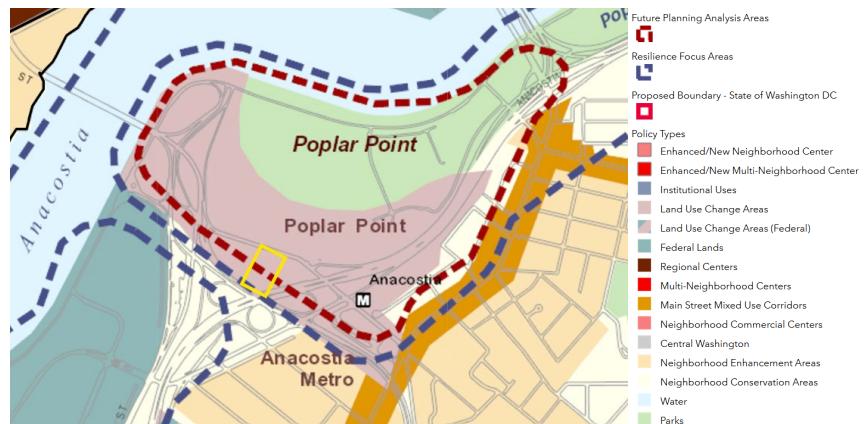
The Revised Project is not inconsistent with the FLUM designation for the Property. While the Revised Project provides less density than envisioned for the High Density Residential and Commercial designations, it should be noted that “densities within any given area on the Future Land Use Map reflect all contiguous properties on a block, [and] there may be individual buildings that are larger or smaller than these ranges within each area.” See 10A DCMR § 228.1. Therefore, the FLUM accounts for buildings like the Revised Project, which are less dense than existing or future buildings in the neighborhood.

The Revised Project is otherwise consistent with the objectives of the High Density Residential, High Density Commercial and Institutional designations. It is expected that the area along North Howard Road will be redeveloped with new high-density mixed-use buildings to feature residences and commercial uses. As such, the Revised Project will serve families living in the area and attract more students and families to patronize future businesses in the NHR zone.

The Institutional designation contemplates uses similar to a public charter school. While there is a separate FLUM category for “Local Public Facilities,” which includes land used by District of Columbia public schools and charter schools, the Local Public Facilities designation acknowledges that facilities smaller than one acre “may not appear on the map due to scale.” 10A DCMR § 227.17. Since the Property is less than one acre, the FLUM may not directly account for the public charter school use, which has been in existence for over twenty years.

ii. Generalized Policy Map

The GPM identifies the Property as a “Land Use Change Area” that is also within a “Future Planning Analysis Area.”²



² The Property is also within a “Resilience Focus Area,” which is intended for areas within the 100- and 500-year floodplain. In these locations, “future planning efforts are intended to guide resilience to flooding for new and existing development and infrastructure projects, including public capital projects. Resilience focus areas will explore watershed resilience to encourage the implementation on a neighborhood scale, as well as site-specific solutions, design guidelines and policies for a climate adaptive and resilient District.” 10A DCMR § 304.8.

The Framework Element defines these designations as follows:

- **Land Use Change Areas:** Land Use Change Areas are areas where change to a different land use from what exists today is anticipated. In some cases, the Future Land Use Map depicts the specific mix of uses expected for these areas. In other cases, the Future Land Use Map shows these sites as “Federal,” indicating the District does not currently have the authority to develop appropriate plans for these areas but expects to have this authority by 2025. There are more than two dozen Land Use Change Areas identified on the Generalized Policy Map. They include many of the city's large development opportunity sites, and other smaller sites that are undergoing redevelopment or that are anticipated to undergo redevelopment. Together, they represent much of the city's supply of vacant and underutilized land. The guiding philosophy in the Land Use Change Areas is to encourage and facilitate new development and promote the adaptive reuse of existing structures. Many of these areas have the capacity to become mixed-use communities containing housing, retail shops, services, workplaces, parks, and civic facilities. The Comprehensive Plan's Area Elements provide additional policies to guide development and redevelopment within the Land Use Change Areas, including the desired mix of uses in each area. As Land Use Change Areas are redeveloped, the District aspires to create high quality neighborhoods that demonstrate exemplary site and architectural design and innovative environmental features, compatible with nearby neighborhoods, protect cultural and historic assets, and provide significant affordable-housing and employment opportunities. Measures to ensure that public benefits are commensurate with increased density and to avoid and mitigate undesirable impacts of development of the Land Use Change Areas upon adjacent neighborhoods should be required as necessary. Such measures should prioritize equity by accounting for the needs of underserved communities. 10A DCMR §§ 225.9-225.12.
- **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 Revised 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 Revised Project is not inconsistent with the goals of the Land Use Change Areas to encourage and facilitate new development of vacant or underutilized sites and promote the adaptive reuse of existing structures within those areas. The Property is within the recently-created NHR zone, which is intended to become a vibrant, mixed-use community as contemplated in a Land Use Change Area. Further, the designation expects a mix of uses to include civic facilities like the Revised Project. Overall, the Revised Project will facilitate the redevelopment of the Property to better align with the expected high quality North Howard Road neighborhood through exemplary site and architectural design.

With respect to the Future Planning Analysis Area, the Applicant does not seek a zoning change as part of this application and, therefore, the Revised Project will not impact any future planning activities around the NHR zone.

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 balanced.” 10A DCMR § 300.3. The Revised Project furthers the following Land Use Element policies:

Policy LU-1.4.2: Development Around Metrorail Stations

In developments above and around Metrorail stations emphasize land uses and building forms that minimize the need for automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas. 10A DCMR § 307.10.

Policy LU-1.4.4: Design to Encourage Transit Use

Require architectural and site-planning improvements around Metrorail stations that support pedestrian and bicycle access to the stations and enhance the safety, comfort, and convenience of passengers walking to the station or transferring to and from local buses. These improvements should include sidewalks, bicycle lanes, lighting, signage, landscaping, and security measures. Discourage the development of station areas with conventional suburban building forms, such as shopping centers surrounded by surface parking lots or low-density housing. 10A DCMR § 307.13

Policy LU-1.4.8: Public Facilities

Encourage the siting (or retention and modernization) of public facilities, such as schools, libraries, and government offices, near transit stations and along transit corridors. Such facilities should be a focus for community activities and enhance neighborhood identity. 10A DCMR § 307.17

Policy LU-2.1.2: Neighborhood Revitalization

Facilitate neighborhood revitalization by focusing District grants, loans, housing rehabilitation efforts, commercial investment programs, capital improvements, and other government actions in those areas that are most in need, especially where projects advance equitable development and racial equity, and create opportunities for disadvantaged persons. Engage and partner in these efforts with the persons intended to be served by

revitalization. Use social, economic, and physical indicators, such as the poverty rate, the number of abandoned or substandard buildings, the crime rate, and the unemployment rate, as key indicators of need. 10A DCMR § 310.9.

Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods

Recognize the importance of balancing goals to increase the housing supply, including affordable units, and expand neighborhood commerce with parallel goals to protect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to create vibrant neighborhoods in all parts of the District requires an emphasis on conserving units and character in some neighborhoods and revitalization in others, although all neighborhoods have a role to play in helping to meet broader District-wide needs, such as affordable housing, public facilities, and more. 10A DCMR § 310.10.

Policy LU-2.1.12: Reuse of Public Buildings

Rehabilitate vacant or outdated public and semi-public buildings for continued use including residential uses, particularly if located within residential areas. Reuse plans should be compatible with their surroundings and co-location of uses considered to meet broader District-wide goals. Reuse of public buildings should implement Small Area and Framework Plans where possible. 10A DCMR § 310.19

The Revised Project will reuse the Existing Building in a manner that is compatible with the surrounding neighborhood. The Revised Project offers excellent access to public transportation based on its proximity to the Anacostia Metrorail Station. The access to transit is a particular policy emphasis for public school facilities, as it will improve access to the site for students and faculty. Overall, the Revised Project will contribute to the revitalization along Howard Road from its current underdeveloped status to a vibrant and active mixed-use community.

C. Transportation Element

“The Transportation Element provides policies and actions to maintain and improve the District’s transportation system and enhance the travel choices of current and future residents, visitors, and workers.” *Id.* § 400.1. Accordingly, “[t]he overarching goal for transportation in the District is: Create a safe, sustainable, equitable, efficient, and multimodal transportation system that meets the access and mobility needs of District residents, the regional workforce, and visitors; supports local and regional economic prosperity; and enhances the quality of life for District residents.” *Id.* The Revised Project furthers the following policies in the Transportation Element:

Policy T-1.1.4: Transit-Oriented Development

Support transit-oriented development by investing in pedestrian-oriented transportation improvements at or around transit stations, major bus corridors, and transfer points. Encourage development projects to build or upgrade the pedestrian and bicycle infrastructure leading to the nearest transit stop to create last-mile connections. Pedestrian movements and safety should be prioritized around transit stations. 10A DCMR § 403.10

Policy T-1.3.1: Transit-Accessible Employment

Support more efficient use of the region's transit infrastructure with land use strategies that encourage employment locations near underused transit stations. Work closely with the federal government and suburban jurisdictions to support transit-oriented and transit-accessible employment throughout the region. This would expand the use of major transit investments such as Metrorail. Encourage approaches that improve transit access to jobs for low-income residents. 10A DCMR § 405.7.

Policy T-2.3.2: Bicycle Network

Provide and maintain a safe, direct, and comprehensive bicycle network connecting neighborhoods, employment locations, public facilities, transit stations, parks, and other key destinations. Eliminate system gaps to provide continuous bicycle facilities. Increase the amount of protected bike lanes, wayfinding signage, and Capital Bikeshare stations. 10A DCMR § 410.10.

The Revised Project will benefit families, students and staff by offering improved and expanded school facilities in close proximity to Metrorail. The Revised Project will include new short- and long-term bicycle parking to further support bicyclist access to the Property.

D. Environmental Protection Element

The Environmental Protection Element addresses the protection, conservation, and management of Washington, DC's land, air, water, energy, and biological resources. 10A DCMR § 600.1. Accordingly, this area element provides policies and actions for addressing issues such as climate change, drinking water safety, the restoration of the tree canopy, energy conservation, air quality, watershed protection, pollution prevention, waste management, the remediation of contaminated sites, and environmental justice. *Id.* The Revised Project supports the following Environmental Protection Element policies:

Policy E-1.1.2: Urban Heat Island Mitigation

Wherever possible, reduce the urban heat island effect with cool and green roofs, expanded green space, cool pavement, tree planting, and tree protection efforts, prioritizing hotspots and those areas with the greatest number of heat-vulnerable residents. Incorporate heat island mitigation into planning for GI, tree canopy, parks, and public space initiatives. 10A DCMR § 603.6

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-3.2.7: 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.

Policy E-7.1.3: Sustainable Landscaping

Require sustainable practices for landscaping projects, GI, and restoration projects on District properties that reduce the need for watering and mowing, control the spread of invasive species, increase the use of landscaping for stormwater management, provide habitats, and reduce the use of pesticides and herbicides. Consider using industry best practices and certifications to guide this policy. 10A DCMR § 630.6.

The Revised Project will maintain an extensive amount of green space along the eastern side of the Property. The Revised Project also includes new plantings and bioretention areas on the Property. The Revised Project will incorporate solar panels to provide a minimum of 1% of total energy needed to operate the building.

E. Urban Design Element

The Urban Design Element offers ways in which different aspects of the District's landscape, especially its buildings, streets, and open spaces, work together to define impressions of the city and its neighborhoods. 10A DCMR § 900.1. The overarching goal of the Urban Design Element is to enhance the beauty, equity, and livability of Washington, DC by reinforcing its historic design legacy and the identity of its neighborhoods and centers, integrating new construction with existing buildings and the natural environment, and improving the vitality, appearance, and functions of streets and public spaces. 10A DCMR § 901.1. The Revised Project furthers the following Urban Design Element policies:

Policy UD-2.2.1: Neighborhood Character and Identity

Strengthen the visual qualities of Washington, DC's neighborhoods as infill development and building renovations occur by encouraging the use of high quality and high-performance architectural designs and materials. In neighborhoods with diverse housing types, or when introducing more diverse infill housing types, use design measures to create visual and spatial compatibility. 10A DCMR § 909.6.

Policy UD-2.2.5: Infill Development

New construction, infill development, redevelopment, and renovations to existing buildings should respond to and complement the defining visual and spatial qualities of the surrounding neighborhood, particularly regarding building roof lines, setbacks, and landscaping. Avoid overpowering contrasts of scale and height as infill development occurs. 10A DCMR § 909.10.

Policy UD-2.2.6: Preservation of Neighborhood Open Space

Ensure that infill development respects and improves the integrity of neighborhood open spaces and public areas. Buildings should be designed to minimize the loss of sunlight and maximize the usability of neighborhood parks and plazas. Buildings adjacent to parks or natural areas should orient their entrances or other community-serving functions toward these shared resources. 10A DCMR § 909.14.

Policy UD 4.1.1: Capital Improvements and Urban Design

Use new capital improvement projects as opportunities to strengthen the District's urban design vision. Important community-serving civic places, such as schools and libraries, should be designed as civic icons with a high level of architectural quality, enhancing neighborhood identity and promoting the pride of residents and the admiration of visitors at both the neighborhood and District-wide level. 10A DCMR § 919.4.

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). 10A DCMR § 920.6.

The Revised Project will provide a new and modern school addition, as well as upgrades to the Existing Building, which contribute to the architectural vision for the NHR zone. The addition makes use of the Property's open space to achieve the Applicant's goals for its students. The addition features a welcoming and active façade through the use of materiality and design.

F. Education Facilities Element

The Educational Facilities Element addresses the location, planning, use, and design of the District's educational facilities and campuses. It includes policies and actions related to early childhood development facilities, public primary and secondary District of Columbia Public Schools (DCPS), public charter schools, private schools, and higher educational facilities, including public and private colleges and universities. 10A DCMR § 1200.1. The overarching goal for educational facilities is to provide facilities that accommodate population growth and its geographic distribution and 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. 10A DCMR § 1201.1.

Policy EDU-1.3.1: Planning for Public Charter Schools

Incorporate the needs of public charter schools in public school facility planning, including in MFP efforts, to account for the community's desire for a District-wide system of neighborhood public schools supplemented by school choice that is equitably invested in and provides predictable and fair access to high-quality schools in all of Washington, DC's communities. 10A DCMR § 1205.8.

Policy EDU-1.3.2: Partnerships for Public Charter School Facilities

Explore partnership opportunities to enhance operation, modernization, and/or construction of new public charter school facilities, and strongly encourage the retention and inclusion of actively used recreational areas and/or open space. 10A DCMR § 1205.9.

Policy EDU-1.5.1: Promoting High-Quality Design

New construction, renovation or reconstruction of public, private, and public charter school facilities should use high architectural and landscape design standards that are sensitive to community context, as well as academic and student safety needs. 10A DCMR § 1207.3.

Policy EDU-1.5.3: Eco-Friendly Design

Strongly support the use of green building, energy efficiency, and green infrastructure development methods in school construction and rehabilitation of K-12 public, private, and public charter school design. 10A DCMR § 1207.5

Policy EDU-1.5.4: Multimodal Access to Schools

Continue to coordinate among District Department of Transportation (DDOT), DCPS, DC PCSB, and K-12 private school stakeholders to improve the safety of students walking or biking to and from school through design and transportation improvements in coordination with the safe routes to school program. In addition, new K-12 public, private, and public charter school buildings should be designed to foster safe and attractive pedestrian access. Encourage transit connections to high schools to provide easy access for students and teachers, thereby minimizing the need for driving to school. 10A DCMR § 1207.6.

Policy EDU-1.5.5 School Projects and Design Plans

Seek to better align proposed school modernization and new school projects with District-wide and place-based design plans so that school design achieves a high quality. 10A DCMR § 1207.7.

Policy EDU-1.6.3: Preserving Sites Near Transit

Preserve school sites located near Metrorail and other locations well served by transit for educational use. 10A DCMR § 1208.14.

Policy EDU-2.1.2: Wrap-Around Services

Where space is available, continue to accommodate wrap-around health and human services programs within schools to address the non-academic needs of students and families. Include affordable child-care services wherever feasible. 10A DCMR § 1209.5.

Policy EDU-2.2.1: Intergovernmental Coordination

Coordinate DCPS facility planning efforts with District agencies to so that school modernization produces better education facilities for District children while also improving the neighborhood. 10A DCMR § 1210.2.

Policy EDU-2.2.2: Educational Facilities in Local Plans

Involve DCPS and DC PCSB in District government land use and transportation planning activities. Local principals, faculty, students, parents, and other local stakeholder groups should be invited and encouraged to participate in decisions that impact school facilities and their surroundings. 10A DCMR § 1210.3

The Revised Project is an improved public charter school building that provides increased programming and wrap-around services for students as well as an expanded capacity for the Applicant to attract new students. The Revised Project employs high-quality and environmentally-friendly design to capitalize on the Property's proximity to Metrorail and public transit.

G. Lower Anacostia Waterfront/Near Southwest Area Element

Policy 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. 10A DCMR § 1907.3.

Policy AW- 1.1.5: Flood-Resilient and Climate-Adaptive Development

Provide guidelines and promote the planning, design, construction, and management of resilient buildings in flood hazard areas within the Lower Anacostia Waterfront/Near Southwest Planning Area. Design and construct developments to be adaptive to future flood hazard conditions due to storm surge and sea level rise. 10A DCMR § 1907.6.

Policy AW-2.4.3: Poplar Point Mixed-Use Neighborhood

Create a new transit-oriented mixed-use neighborhood oriented around the Poplar Point Park and linked to the Anacostia and Congress Heights Metro stations. The neighborhood should include a significant component of affordable housing, as well as retail and civic uses that benefit the adjacent communities east of I-295. To minimize the loss of useable open space, development should use the land recovered after the realignment and reconstruction of the Frederick Douglass Bridge. 10A DCMR § 1913.9.

Policy AW-2.4.5: Scale of Development at Poplar Point

Provide a scale and pattern of development at Poplar Point that recognizes the area's proximity to a Metro station and other major surface arterials. The area is physically separated from surrounding neighborhoods and, therefore, may accommodate buildings and site plans that are unlike but compatible with the fine-grained pattern found in nearby

Historic Anacostia. Development should be pedestrian-oriented and include active ground floor uses. The massing, height, and bulk of buildings and related features, such as parking, also should respect adjacent park uses and environmentally sensitive areas. 10A DCMR § 1913.11.

Policy AW-2.4.7: Poplar Point as an Economic Catalyst

Use development at Poplar Point to bring economic development opportunities to adjacent neighborhoods, particularly Barry Farm and Historic Anacostia. Activities at Poplar Point should foster the success of existing businesses in Historic Anacostia, provide job opportunities, and create cultural, educational, and institutional uses that benefit communities in Wards 7 and 8. 10A DCMR § 1913.13.

Policy AW-2.4.8: Access Improvements to Poplar Point

Improve access to Poplar Point by redesigning the road system on the site's perimeter; rebuilding the Frederick Douglass (South Capitol) Bridge; converting the Anacostia Metro station to a multimodal terminal; adding provisions for pedestrians and bicycles along Howard Road SE, W Street SE, and Good Hope Road SE; and providing water taxi service on the Anacostia River. 10A DCMR § 1913.14.

The Revised Project builds on the vision of the “Bridge District” to turn the area around Poplar Point into a new and dynamic mixed-use neighborhood. The Revised Project will harmonize with the expected redevelopment of adjacent parcels with new residences and commercial space. The Revised Project also incorporates floor-resilient design measures.

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 affected community is Ward 8, a majority Black community that has experienced neglect and underinvestment that impacts residents’ social and economic opportunities. The part of

Ward 8 where the Property is located is historically defined by the nearby Anacostia waterfront. During the 18th and 19th centuries, the area experienced a prevalence of job opportunities through wharves and fisheries leading to the development of moderate-income housing. *See* 10A DCMR § 1901.2. By the time of the Civil War, the area by the Anacostia River became dominated by tobacco farming and industrial activities. *See* 10A DCMR § 1901.3. Many of the workers in these industries were newly emancipated residents, beginning a long history of African-American neighborhoods along the Anacostia River. *Id.* However, the increased farming and industrial activity lead to the polluting of the river, a trend that continued on through the 20th century.

During the first half of the 20th century, the neighborhoods close to the Anacostia waterfront experienced consistent population growth. However, the area was increasingly defined by unwanted land uses and pollution of the Anacostia River, and, following World War II, the population living by the Anacostia waterfront began to deteriorate. *See* 10A DCMR §§ 1901.4-1901.6. In response to the declining population, planning policies were implemented to clear and rebuild the waterfront community, including the construction of a new Southeast/Southwest Freeway. *Id.* The renewal plans and the new freeway lead to the displacement of thousands of mostly lower-income Black families living by the Property. *Id.*

More recently, there has been a substantial push to clean-up the Anacostia River and revitalize many of the communities along the waterfront. Nonetheless, many Ward 8 residents continue to experience disproportionately poor outcomes in terms of education, housing, employment and health.

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

As a public school, the Applicant already has a connection with existing families and students that allows for effective and direct communication.

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

The Applicant has used in-person communication for school families. For the broader community, the applicant used a combination of email and phone call communications as well as attending virtual meetings of ANC 8A.

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

The Applicant engaged extensively with ANC 8A in connection with the approved Project, including attending public meetings in October 2024, November 2024 and January 2025. ANC 8A voted to support the Approved Project.

The dates of meetings and points of engagement related to the Revised Project are as follows:

- *September 2, 2025 – Public meeting of ANC 8A*

In addition to the above, as a public charter school serving primarily Ward 8 students, the Applicant has a long history of engagement and involvement in the community. The Applicant

has informed existing families and students of the Applicant's plans to build a new school building, and will continue to engage through the construction process.

ANC 8A also supported the Approved Project

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

The Revised Project will provide an improved school building that will continue to serve underprivileged families and students in Ward 8. The Revised Project will offer improved and expanded programming with the intent to achieve better long-term outcomes for its students. The Revised Project will also allow for additional employment opportunities by increasing school capacity.

Members of the affected community that would potentially be burdened by the proposed zoning action.

The Revised Project is not expected to burden community members. The Property has historically been used as a school and will continue to be a school. Short-term construction impacts will be limited as much of the surrounding neighborhood is currently undeveloped, and the Property otherwise abuts a highway. The NHR zone is also largely segmented from neighborhoods to the south.

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.

Although the Applicant has not received any direct community input on challenges resulting from past and present discrimination, the mission of the Applicant's school is to address some of the historic inequities in the Ward 8 community by providing improved access to quality education and support services. The Revised Project will help the Applicant to achieve this mission by providing new and expanded classroom space to serve more students and offer specialized programming aimed to close the education gap in Ward 8.

Potential positive outcomes of the proposed zoning action identified by the affected community.

The community generally voiced support for the Revised Project, as it will provide a new school building for its students mostly located in Ward 8.

Potential negative outcomes of the proposed zoning action identified by the affected community.

The community identified certain concerns related to traffic congestion in and around the Property.

Changes/modifications made to the proposed zoning action that incorporate/respond to the input received from the affected community, including potential mitigation measures

None.

Input received from the affected community not incorporated into the proposed zoning action.
None.

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 Revised 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 Revised 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)	The Revised Project will not cause physical displacement, as the Revised Project will improve the existing school building on the site.		
Economic (Indirect)	The Revised Project is not expected to create any indirect economic displacement.		
Cultural (Indirect)	The Revised Project is not expected to create any indirect cultural displacement.		
Housing			
Availability of Housing			
Preservation of Affordable Housing			
Replacement Housing			

Housing Burden		
Homeownership Opportunity		
Larger Unit Size		
Employment		
Entrepreneurial Opportunities	The Revised Project will not impact entrepreneurial opportunities.	
Job Creation	<p>-The Applicant's goal is to expand student capacity and thereby increase the number of full time teacher and staff opportunities; The Applicant currently has 89 full-time staff members and hopes to increase to 135 full-time positions with the Revised Project.</p> <p>-The Applicant will also work with Ward 7 and 8 contractors in connection with construction of the Revised Project.</p>	
Job Training	The Applicant is coordinating with the Department of Employment Services to determine potential apprenticeship or training opportunities during construction or operation of the school.	
Access to Employment	The Property's proximity to Metrorail offers excellent access for employees.	
Transportation/Infrastructure		
Public Space/Streetscape Improvements		
Infrastructure Improvements	The Revised Project does not propose infrastructure improvements.	
Access to Transit	The Revised Project is three blocks from the Anacostia Metrorail Station.	
Pedestrian Safety	The Existing Building has operated as a school for over 20 years with students and staff able to safely access the Property	
Education/Health/Wellness		
Schools	The Revised Project is a new school addition that will better serve the Applicant's student body with new space for students, staff and families as well as increase capacity to help the Applicant achieve its expansion goals to serve more students.	
Healthcare	The Revised Project does not impact healthcare.	
Open Space/Recreational	The Revised Project maintains green space on the Property and provides a playground for students.	

Environmental		
Environmental Changes	<ul style="list-style-type: none"> -The Revised Project is a development within the 500-year floodplain. -The Revised Project provides improved storm-water management with new bioretention features. -The Revised Project provides renewable energy generation. 	
Sustainable Design	The Revised Project is designed to achieve LEED certification	
Remediation	No environmental remediation is required.	
Access to Opportunity		
Neighborhood Retail and Service Uses	The Revised Project will not provide retail or service uses.	
Residential Amenities	The Revised Project will not impact nearby residential amenities.	
Arts & Culture	The Revised Project will not impact arts and culture in the neighborhood.	