
2455 ALABAMA AVENUE, SE (SQUARE 5728, LOT 800)

APPLICATION FOR A CONSOLIDATED PLANNED UNIT DEVELOPMENT AND RELATED ZONING MAP AMENDMENT TO THE RA-2 ZONE

EVALUATION OF CONSISTENCY WITH THE DC COMPREHENSIVE PLAN

EXECUTIVE SUMMARY

Pursuant to 11-X DCMR § 304.4, the Zoning Commission shall find that a proposed Planned Unit Development (“PUD”) and related Zoning Map Amendment (ZMA) (together, the “Application”):

- (a) Is not inconsistent with the Comprehensive Plan (“Comp Plan”) and with other adopted public policies and active programs related to the subject Property;
- (b) Does not result in unacceptable project impacts on the surrounding area or on the operation of city services and facilities but instead shall be found to be either favorable, capable of being mitigated, or acceptable given the quality of public benefits in the project; and
- (c) Includes specific public benefits and project amenities of the proposed development that are not inconsistent with the Comp Plan or with other adopted public policies and active programs related to the subject Property.

Through a racial equity lens, this Evaluation of Consistency with the Comp Plan (“Evaluation”) provides a thorough analysis of how the Application is not inconsistent with the Property’s applicable designations under the Future Land Use Map (“FLUM”) and Generalized Policy Map (“GPM”), relevant policies of the Far Southeast/Southwest (“FSS”) Area Element of the Comp Plan, and other Citywide Elements of the Comp Plan that are applicable to the Property. In addition, this Evaluation includes a summary of community outreach and outcomes that advance racial equity. An assessment of potential inconsistencies with the Comp Plan is also included, which justifies how such inconsistencies are outweighed by the Application’s consistency with the FLUM, the GPM, Citywide Elements that include Land Use, Community Service Facilities, Transportation, Environmental Protection, Urban Design, and Economic Development Elements, and the FSS Area Element.

PROJECT SUMMARY

The Applicant proposes to replace the outdated Metropolitan Police Department (“MPD”) 7th District Headquarters building located at 2455 Alabama Avenue, SE (Square 5728, Lot 800)(the “Property”) with a new MPD facility on the northern portion of the Property and a connected above-grade parking structure on the southern portion of the Property (“Project”). The Project will provide approximately 151,854 square feet of gross floor area (approximately 2.29 FAR), a maximum height of 49 feet, 1 inch, and approximately 225 parking spaces. In addition to meeting MPD’s operational needs, the facility will include a multi-purpose room and gathering spaces for the community. The Application also requests a PUD-related ZMA to rezone the Property to the RA-2 zone.

KEY FINDINGS

- **No Displacement Risk:** The proposed Project will not result in direct or indirect displacement, as the Property is already occupied by a District-owned police facility and contains no housing or private commercial uses.
- **Alignment with Comprehensive Plan:** The RA-2 zone is not inconsistent with the FLUM designation of Local Public Facilities and the GPM designation of Federal Lands, both of which anticipate continued use and modernization of civic facilities.
- **Modernized Public Facility:** The Project will replace an obsolete police station with a modern, efficient MPD facility, improving service delivery, operational efficiency, and public safety infrastructure.
- **Community-Serving Multi-Purpose Space:** The inclusion of a multi-purpose room within the Project directly advances Comp Plan goals for public facilities, providing a safe and accessible gathering space that supports youth programming, mentoring, and community-building.
- **Advances Racial Equity:** The Project responds to a pattern of disinvestment and exclusion in the Garfield Heights and Knox Hill/Buena Vista neighborhoods by delivering equitable public investment, expanding access to government services, and strengthening resources in historically marginalized communities.
- **Transit Accessibility:** Located along Alabama Avenue, SE, the Property is served by multiple bus routes with direct connections to nearby Metrorail stations, supporting multimodal access for residents, workers, and visitors.
- **Sustainability and Resilience:** The Project will incorporate green roofs, abundant on-site solar with arrays on the roof and the south building elevation, stormwater management, tree canopy expansion, and resilient design features, advancing the District's environmental and climate goals while improving neighborhood conditions.
- **Community Engagement and Support:** The Applicant has engaged ANC 8B and local stakeholders, with the ANC voting unanimously in support of the Project. The Project reflects community priorities for stronger public safety, improved facilities, and equitable neighborhood investment.

CONCLUSION

The Application for 2455 Alabama Avenue, SE represents a strategic public investment that is fully consistent with the Comp Plan, responsive to community priorities, and aligned with the District's racial equity, sustainability, and public facility goals. By modernizing an obsolete police facility, introducing community-serving multi-purpose space, and reinforcing Alabama Avenue, SE as a civic anchor, the Project meaningfully advances the District's vision for equitable growth and neighborhood revitalization in Ward 8.

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I. INTRODUCTION

The District of Columbia Department of General Services (“DGS”), the owner of property located at 2455 Alabama Avenue, SE (Square 5728, Lot 800) (the “Property”) submits this Evaluation in support of a proposed PUD and related ZMA (together, the “Application”) for the Property from the RA-1 zone to the RA-2 zone. The Property is currently improved with the MPD 7th District Headquarters building, an associated fuel station, workshop, and surface parking. **The purpose of this Application is to allow for redevelopment of the Property by razing the existing MPD 7th District Headquarters building, which has exceeded its useful life, and replacing it with a new MPD 7th District Headquarters building on the northern portion of the Property. The southern portion of the Property would be improved with a new above-grade parking structure connected internally to the Headquarters building. The proposed building will contain approximately 151,854 square feet of gross floor area (approximately 2.29 floor area ratio) and will be constructed to a maximum height of 48 feet, 1 inch. The parking garage will provide approximately 225 new parking spaces. In addition to serving MPD’s operational needs, the new building will include a multi-purpose room and gathering spaces intended for public use.**

As set forth below, the Application is not inconsistent with the Comp Plan as adopted by the D.C. Council pursuant to D.C. Law L23-0217 (Comprehensive Plan Amendment Act of 2017) and D.C. Law 24-0020 (Comprehensive Plan Amendment Act of 2020), including the GPM and FLUM (D.C. Resolution R24-0292), collectively referred to herein as the “Comp Plan”.¹

Pursuant to the Home Rule Charter, zoning shall not be inconsistent with the Comp Plan. D.C. Code §6-641.02. As stated in the Framework Element, “[i]n its decision-making, the [Commission] must make a finding of not inconsistent with the [Comp Plan]. To do so, the [Commission] must consider the many competing, and sometimes conflicting, policies of the [Comp Plan], along with the various uses, development standards and requirements of the zone districts. It is the responsibility of the [Commission] to consider and balance those policies relevant and material to the individual case . . . and clearly explain its decision-making rationale.” See 10-A DCMR § 224.8. To approve the Application, the Commission must consider and balance potential Comp Plan consistencies and inconsistencies to make an overall determination as to whether the request is “not inconsistent” with the Comp Plan when read as a whole.

II. COMPREHENSIVE PLAN CONSISTENCY EVALUATION

As detailed herein, **the Application is not inconsistent with the policies and goals of the Comp Plan when read as a whole.** The following sections reflect the Applicant’s thorough evaluation of the Application’s overall consistency with the Comp Plan. Given the broad range of overlapping policy topics addressed in the Comp Plan, certain Citywide Elements may have little to no applicability to a zoning proposal. Such is the case for the subject Application. Nevertheless, in conducting its Comp Plan evaluation, the Applicant has thoroughly reviewed the goals and policies of each and every Comp Plan Element. For those Citywide Elements and policies that are

¹ D.C. Law L23-0217 took effect on August 27, 2020, and included amendments to the Comp Plan Framework Element. D.C. Law L24-0020 took effect on August 21, 2021, and included amendments to the Comp Plan general, citywide, and area elements, and the Generalized Policy Map and Future Land Use Map. The Generalized Policy Map and Future Land Use Map were formally approved on November 16, 2021, pursuant to Resolution No. R24-0292.

more directly applicable to the Application, a narrative is provided below explaining the basis for the Applicant's determination that the Application is not inconsistent with that particular Element and policy. Finally, in accordance with the guidance provided by the D.C. Court of Appeals (the "Court"), this Evaluation also includes a specific assessment of potential Comp Plan inconsistencies.

III. RACIAL EQUITY AND THE COMPREHENSIVE PLAN

A primary focus of the Comp Plan, as reflected throughout its various policies, is achieving racial equity. The Framework Element of the Comp 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." *See* 10-A DCMR § 213.7. The importance of equity to District residents was made abundantly clear when the D.C. Office of Planning ("OP") conducted its D.C. Values survey in Spring 2019. In addition to equity, city residents also expressed concerns about rising costs and inequitable access to opportunities for housing, businesses, employment, and other necessities. Overall, livability, equity, and safety were considered the most critical values. *See* 10-A DCMR §§ 107.17–107.22.

As stated in the Framework Element and as further discussed below, equity is both an outcome and a process. *See* 10-A DCMR § 213.6. Equity exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. Equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. An important factor to advancing racial equity is to acknowledge that equity is not the same as equality. *Id.* "As an outcome, the District achieves 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. As a process, we apply a racial equity lens when those most impacted by structural racism are meaningfully involved in the creation and implementation of the institutional policies and practices that impact their lives, particularly people of color." *See* 10-A DCMR § 213.9.

Equity is conveyed through the Comp Plan, particularly in the context of zoning, where certain priorities stand out, including affordable housing, avoiding displacement, and access to opportunity. To help guide the Commission in applying a racial equity lens to its decision making, the Implementation Element reads, in relevant part, "[a]long with consideration of the defining language on equity and racial equity in the Framework Element, guidance in the Citywide Elements on District-wide equity objectives, and the Area Elements should be used as a tool to help guide equity interests and needs of different areas in the District." *See* 10-A DCMR § 2501.6.

As related to zoning actions, racial equity is not a separate consideration from the normal legal standard of review. Rather, the Commission properly considers equity as an integral part of its analysis regarding whether a proposed zoning action is "not inconsistent" with the Comp Plan. The scope of the racial equity review and the extent to which Comp Plan policies apply depend upon the nature of the proposed zoning action. In this case, the Commission shall evaluate the

Application using its Racial Equity Tool² to make its determination regarding whether it is not inconsistent with the Comp Plan as a whole.

a. RACIAL EQUITY AS A PROCESS

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. *See* 10-A DCMR § 213.7. The Applicant believes in inclusive, community engagement. To this end, the Applicant has and will continue to work closely with the community, including the affected ANC, throughout the Application process.

b. 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.” *See* 10-A DCMR § 213.6. As stated above, under the Comp Plan, the Commission shall carry out its Comp Plan evaluation for the Application through a racial equity lens. The table in Section XI correlates the Application with a number of equitable development indicators in general terms. As the table shows, the Application has the potential to address a number of equity issues experienced by residents in the Garfield Heights and Knox Hill/Buena Vista neighborhoods.

The following evaluation follows the Zoning Commission’s Racial Equity Tool, organized in four parts.

IV. PUD AND RELATED ZONING MAP AMENDMENT SUMMARY

2455 Alabama Avenue SE (Square 5728, Lot 800)	
Proposed Zoning Action:	The Applicant proposes a PUD and related ZMA to the RA-2 zone.
Current Zone:	RA-1 – Provides for areas predominantly developed with low- to moderate-density development, including detached houses, row houses, and low-rise apartments.
Proposed Zone:	RA-2 – Provides for areas developed with predominantly moderate-density residential.
Land Area:	66,371 sq. ft.
FLUM Designation:	Local Public Facilities
GPM Designation:	Federal Lands
Existing Development:	The Property is currently improved with the MPD 7 th District Headquarters building, an associated fuel station, workshop, and surface parking.

² Available at: <https://dcoz.dc.gov/release/zc-racial-equity-analysis-tool-new>.

V. PART ONE: RACIAL EQUITY ANALYSIS SUBMISSIONS (GUIDANCE REGARDING THE COMPREHENSIVE PLAN)

As required by Part One of the Racial Equity Tool, the Applicant has conducted a thorough evaluation of the Application's consistency with the Comp Plan, including the FLUM, the GPM, the policies of all applicable Citywide and Area Elements. No adopted Small Area Plans or other planning studies apply to the Property.

a. COMPREHENSIVE PLAN OVERVIEW AND APPLICATION

As discussed below, the Application is not inconsistent with the Comp Plan. The Comp Plan guides the District's development, both broadly and in detail, through maps and policies that address the physical development of the District. *See* 10-A DCMR § 103.2. The Comp Plan also addresses social and economic issues that affect and are linked to the physical development of the District and the well-being of its citizens. The Comp Plan provides the general overview of how change will be managed in the years ahead and, thus, is intended to be interpreted broadly. *See* 10-A DCMR § 103.5.

Because the Comp Plan is the one plan that guides the District's development, it carries special importance in that it provides an overall direction and shapes all other physical plans the District may adopt. *See* 10-A DCMR § 103.2. The Comp Plan includes detailed maps and policies for the physical development of the District and addresses social and economic issues that affect the District and its citizens. The Comp Plan allows the District to ensure its resources are used wisely and efficiently and that public investment is focused in areas where it is most needed. *See* 10-A DCMR § 100.13. Subsection 228.1(d) of the Comp Plan reads, in relevant part, the "zoning of any given area should be guided by the [FLUM] interpreted in conjunction with the text of the Comp Plan, including Citywide Elements and the Area Elements, as well as approved Small Area Plans."

b. FUTURE LAND USE MAP

The FLUM shows the general character and distribution of recommended and planned uses across the city, and, along with the GPM, is intended to provide generalized guidance on whether areas are designated for conservation, enhancement, or change. *See* 10-A DCMR §§ 200.5 and 224.4. The land use category descriptions on the FLUM describe the general character of development in each area, citing typical FARs as appropriate. However, the granting of density bonuses may result in densities that exceed those typical ranges stated in the land use category descriptions. *See* 10-A DCMR § 228.1(c). By definition, the FLUM is to be interpreted broadly and the land use categories identify desired objectives. *See* 10-A DCMR § 228.1(a). Decisions on requests for rezoning shall be guided by the FLUM read in conjunction with the text of the Comp Plan (Citywide and Area Elements) as well as Small Area Plans pertaining to the area proposed for rezoning. *See* 10-A DCMR § 2504.5.

The FLUM designates the Property within the PUD Boundary as **Local Public Facilities**.

The Framework Element describes this designation as follows:

- **Local Public Facilities:** This designation includes land and facilities occupied and used by the District of Columbia government or other local government agencies (such as WMATA), excluding parks and open space. Uses include public schools including charter schools, public hospitals, government office complexes, and similar local government activities. Other non-governmental facilities may be co-located on the Property. While included in this category, local public facilities smaller than one acre – including some of the District’s libraries, police and fire stations, and similar uses – may not appear on the map due to scale. Zoning designations vary depending on surrounding uses. *See* 10-A DCMR § 227.17

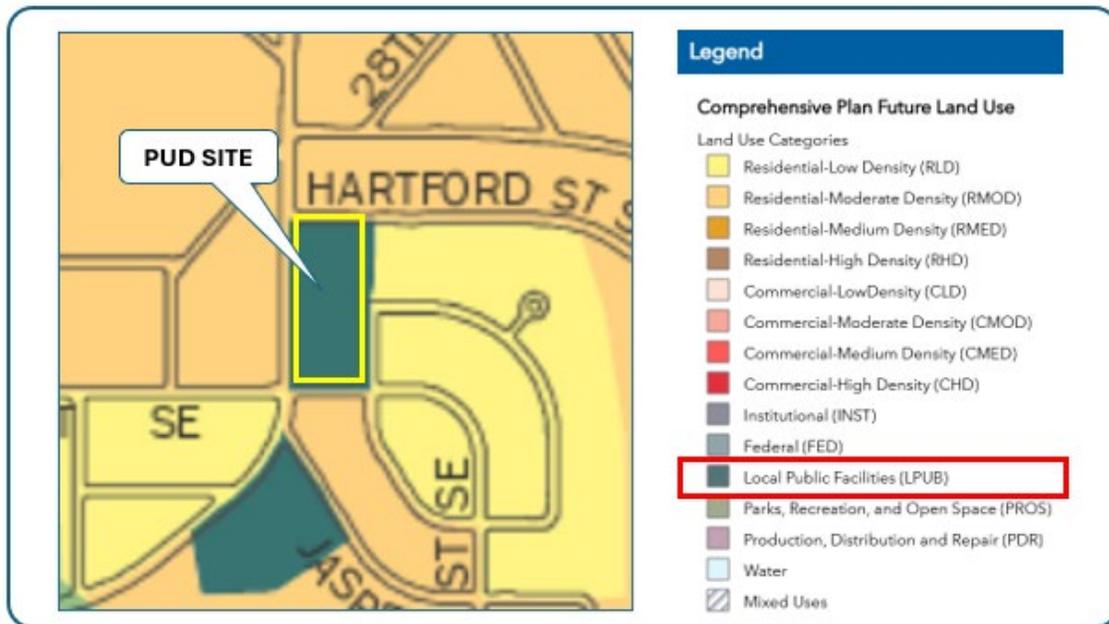


FIGURE 1: FLUM DESIGNATION

The Comp Plan states that “[t]he Map does not show density or intensity on institutional and local public sites. If a change in use occurs on these sites in the future (for example, a school becomes surplus or is redeveloped), the new designations should be comparable in density or intensity to those in the vicinity, unless otherwise stated in the Comp Plan Area Elements or an approved Campus Plan.” *See* 10-A DCMR § 228.1. Applying that guidance here, the proposal maintains a local public facility use on a long-standing District-owned property and organizes its bulk to read as moderate in scale along Alabama Avenue, SE. The maximum building height is 48 feet, 1 inch feet, creating a neighborhood-appropriate envelope that is comparable to the tallest garden apartment forms nearby. Similarly, the massing is stepped and buffered to transition to the surrounding context of detached and semi-detached homes. Off-street, internalized loading and structured parking further reduce edge impacts and free up perimeter area for landscaping, setbacks, and tree canopy, which softens the facility’s presence along residential frontages.

Although the Project’s FAR of 2.29 is numerically higher than FARs typical of low- to moderate-density residential districts, the resulting intensity is principally a function of the Project’s operational program and the need to internalize parking within a structured facility, both

of which add gross floor area without generating impacts typical of a residential building or round-the-clock activity. The Property's size and layout allow the building to pull mass away from sensitive edges through setbacks, topographic siting, and landscape buffers so the perceived scale at the neighborhood interface aligns with garden apartment and institutional forms already present. Its location on an established transit corridor with multiple bus lines supports somewhat greater on-site intensity without overburdening local streets. Moreover, the Transportation Demand Management ("TDM") Plan measures that will be developed with DDOT will ensure that circulation and access remain compatible with adjacent residential blocks. Taken together, these design, operational, and locational attributes make the proposed density a context-sensitive fit and consistent with the Comp Plan's direction that institutional sites be comparable in intensity to their surroundings.

The proposed RA-2 zone, which permits a maximum density of 2.41 FAR as a PUD, supports moderate-density development that is compatible with the surrounding residential context, which includes garden apartments, detached dwellings, and semi-detached dwellings. While the FLUM designates the Property as Local Public Facilities, this category explicitly includes land and facilities used by the District government, such as police stations, and allows for modernization and redevelopment of such uses.

The Application will facilitate the redevelopment of the existing outdated MPD station into a new, modernized facility that will serve a critical public safety need. This result aligns with the Comp Plan's goals of maintaining and enhancing local public facilities to meet the needs of a growing population and evolving service demands. *See* 10A DCMR § 1103.3. The RA-2 zone provides an appropriate density for the proposed Project, offering flexibility for design and site planning while maintaining compatibility with adjacent residential uses and increasing services to District residents.

Importantly, the Comp Plan recognizes the urgent need to upgrade aging public safety infrastructure. A 2014 assessment found that approximately 40 percent of police and fire facilities were more than 75 years old, and 30 percent had inadequate space. Between 2009 and 2014, the number of facilities rated in good condition declined by 13 percent. Even buildings in relatively good condition may lack the infrastructure needed to support modern technology and telecommunications functions. Public facilities represent a symbolic face of Washington, DC. They should be highly functional, promote positive neighborhood identity, and elicit confidence in the government. *See* 10-A DCMR § 1113.4.

Accordingly, **the proposed PUD and related ZMA to the RA-2 zone is not inconsistent with the Local Public Facilities designation** and advances the Comp Plan's goals of investing in public infrastructure, supporting neighborhood-serving government services, and ensuring that public facilities are modern, efficient, and well-integrated into the urban fabric.

C. GENERALIZED POLICY MAP

The purpose of the GPM is to categorize how different parts of the District may change between 2005 and 2025. It highlights areas where more detailed policies are necessary, both within the Comp Plan and in follow-up plans, to manage this change. *See* 10-A DCMR § 225.1. The GPM is intended to "guide land use decision-making in conjunction with the Comp Plan text, the FLUM,

and other Comp Plan maps. Boundaries on the map are to be interpreted in concert with these other sources as well as the context of each location.” See 10-A DCMR § 225.2.

The GPM designates the Property within the PUD Boundary as **Federal Land**.

The Framework Element describes this designation as follows:

- **Federal Lands:** The GPM identifies parks and open space, *land owned by or under the jurisdiction of the District* or federal government, federal lands with federal buildings, Downtown Washington, and major institutional land uses. The fact that these areas are not designated as Conservation, Enhancement, or Land Use Change Areas does not mean they are exempt from the Comp Plan or that their land uses will remain static... See 10-A DCMR § 225.22.

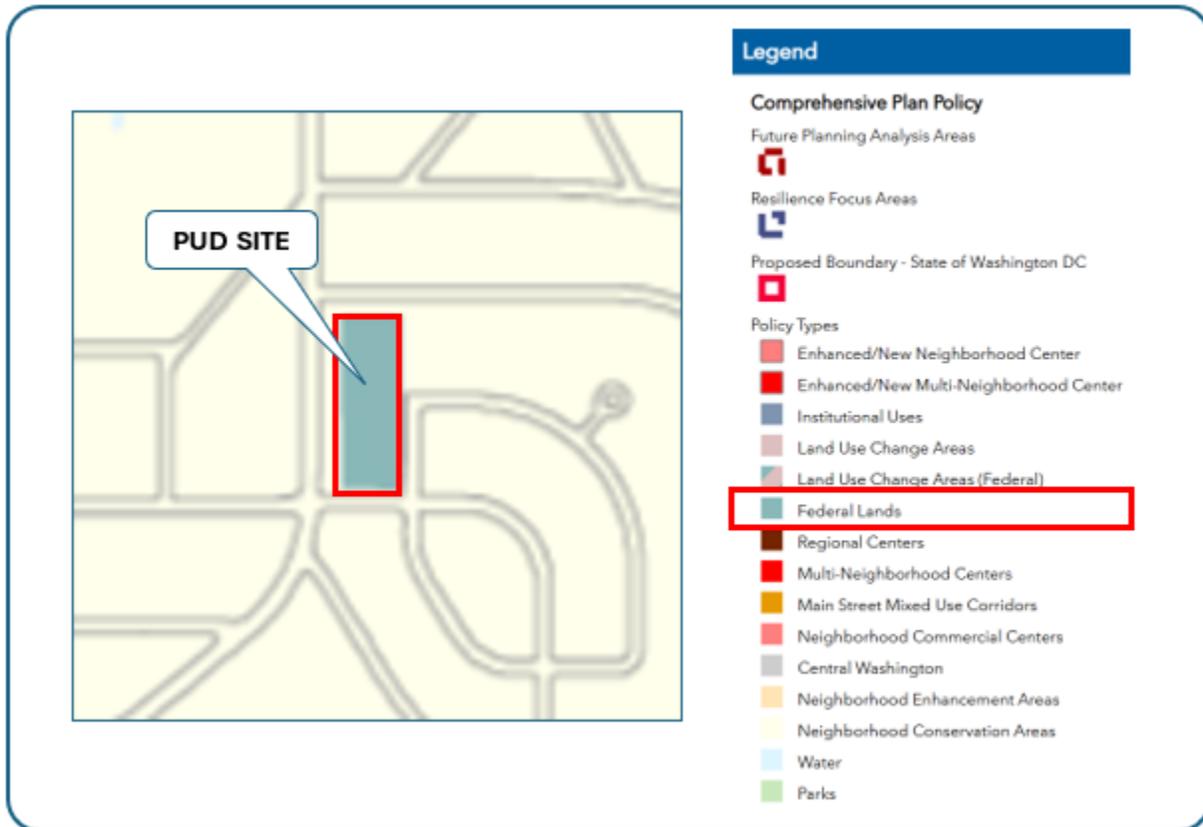


FIGURE 2: GPM DESIGNATION

The proposed PUD and related ZMA from RA-1 to RA-2 is **not inconsistent** with the Federal Lands designation on the GPM. The existing MPD station is a District-owned facility, falling squarely within the scope of the Federal Lands designation. The Comp Plan anticipates that such sites may evolve over time to meet changing public needs. Redevelopment facilitated by the Application reflects this evolution, especially if the public safety function is being reconfigured, as proposed in this case.

Additionally, the proposed RA-2 zone maintains compatibility with the surrounding residential neighborhood and the PUD process ensures that public benefits are delivered in exchange for zoning flexibility.

Importantly, the Federal Lands category on the GPM is not a static designation. Under 10-A DCMR § 225.22, these areas, including land owned by or under the jurisdiction of the District or federal government and major institutional campuses, remain subject to the Comp Plan and may accommodate change and infill as needs evolve. The Comp Plan explicitly notes that institutional sites, including those owned by the District, may see new buildings or facilities added over time. This supports the notion that redevelopment of a District-owned police station is consistent with the Comp Plan’s intent for institutional land to evolve in response to community needs.

Accordingly, **the proposed PUD and related ZMA to the RA-2 zone is not inconsistent with the Federal Lands designation** and advances the Comp Plan’s goal of ensuring that evolving public facilities remain compatible with surrounding neighborhoods and contribute to the vitality of the urban fabric.

d. FAR SOUTHEAST AND SOUTHWEST AREA ELEMENT

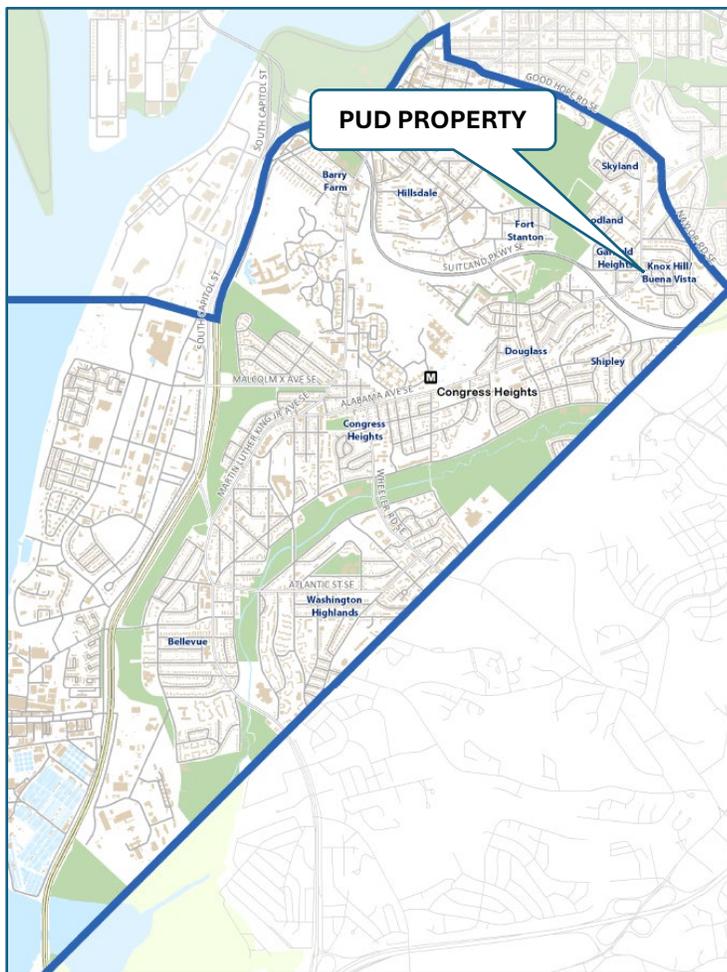


FIGURE 3: FSS AREA ELEMENT BOUNDARIES

The Property is located within the FSS Area Element of the Comp Plan. See 10-A DCMR § 1800.1. The FSS Planning Area encompasses 10.1 square miles east of the Anacostia Freeway and south of Good Hope Road SE/Naylor Road SE. *Id.* The Planning Area includes neighborhoods such as Historic Anacostia, Congress Heights, Hillsdale, Woodland, Fort Stanton, Barry Farm, Bellevue, Washington Highlands, Douglas/Shipley Terrace, Garfield Heights, and Knox Hill/Buena Vista. *Id.* Most of this area has historically been in Ward 8, but, prior to redistricting in 2002, the northern portion was in Ward 6. *Id.*

The FSS neighborhoods have demonstrated resilience through challenging times. Many moderate-income residents left the area in the 1970s, 80s, and 90s, which affected the stability of the neighborhoods. See 10-A DCMR § 1800.4. Between the 2000 Census and the 2013–2017 American Community Survey (“ACS”), the Planning Area’s population grew by

16.3 percent, while the poverty rate declined slightly from 38 percent to 37 percent. *Id.* However, crime and unemployment rates remain persistently high, well above the District and regional averages. *Id.* Addressing poverty, unemployment, illiteracy, crime, and related challenges is essential to improving quality of life for residents of the FSS neighborhoods. *See* 10-A DCMR § 1800.5.

In this context, modernizing the MPD facility is consistent with the Comp Plan’s priorities. Enhancing public safety resources, strengthening community trust, and ensuring equitable enforcement will directly support the broader goals of stability, resilience, and improved quality of life for residents in the FSS neighborhoods. Such modernization will not only address chronic challenges but also provide long-term benefits to the community.

Because the Property is not within a Policy Focus Area identified in the FSS Area Element, there are no site- or subarea-specific directives (e.g., prescribed land-use mixes, targeted open-space locations, or specific community-benefits) that the Project must satisfy beyond the District’s broader goals and policies, which are addressed below.

Modernization of Public Safety Infrastructure

The proposed MPD redevelopment will deliver a modern police station and an above-grade parking garage connected by a pedestrian bridge, centrally located within a predominantly residential area so the facility can continue to serve neighborhood residents effectively. The Project’s program is focused on replacing obsolete public safety infrastructure with a right-sized, efficient civic building and consolidated parking that improves the existing condition.

The Application is not inconsistent with, and affirmatively advances, key policies of the FSS Area Element. Specifically, the Project will deliver a resilient public facility, support workforce development, incorporate sustainable design, address parking and loading needs, and directly advance priorities identified in the Comp Plan.

Sustainability and Climate Resilience

The Project incorporates high-performance, climate-forward design that directly supports “innovative solutions for sustaining economic growth without harming the environment” (FSS-1.1.14)” Planned features include green roofs, expanded tree canopy, stormwater retention with bioretention planting areas, and abundant solar generation on the garage roof and the building’s south elevation, complemented by TDM measures that encourage non-auto trips (FSS-1.1.14; FSS-1.1.15; FSS-R.1.1.A). At the same time, the Project replaces an aging building and surface parking with a modern facility and structured garage, ensuring compliance with the RA-2 zone’s green area ratio requirements (FSS-1.1.14; FSS-1.1.15). Consolidating parking within the structure reduces impervious surface and enables new perimeter landscaping, street trees, and a landscaped civic plaza that enhance stormwater management and improve the pedestrian environment, while the solar array further lowers the Project’s environmental footprint (FSS-1.1.14; FSS-1.1.15; FSS-R.1.1.A; FSS-1.2.A). Collectively, these measures improve on-site environmental performance, mitigate heat and runoff, contribute to neighborhood resilience, and ensure a positive environmental outcome.

Community and Workforce Benefits

In addition, the Project's community-facing spaces will help respond to priorities identified in the FSS Area Element, particularly the need for improved education, job/vocational training, and a strengthened social-service safety net, by hosting community meetings and training activities in a safe, proximate, and transit-accessible public facility (FSS-1.1.10). Modern, well-maintained public facilities are also recognized as foundational to public safety and community wellness; the investment in this building, together with library, school, recreation, and health improvements called for in the Area Element, advances those broader neighborhood stabilization goals (FSS-1.1.10; FSS-1.1.15). While the Project is not housing, it is sensitive to the surrounding residential context and does not displace housing or alter residential entitlements. By concentrating a civic use on an existing civic site, the Project supports the Area Element's strategy to focus higher intensities near appropriate corridors and nodes while protecting established neighborhoods (FSS-1.1.15).

Resilience at Multiple Scales

The proposed design and site-planning choices strengthen resilience at multiple scales. Climate resilience is improved by replacing surface parking with structured parking, expanding tree canopy and bioretention to manage extreme rain and heat, and adding rooftop and vertical solar that can support future on-site energy reliability (FSS-1.1.14; FSS-1.1.15; FSS-R.1.1.A; FSS-1.2.A). Operational resilience is enhanced by internalizing circulation, separating fleet and pedestrian movements, and connecting the separate structures with a secure bridge to maintain continuity of public-safety functions during disruptive events (FSS-R.1.1.A; FSS-1.2.A). Social resilience grows through provision of a civic plaza and safe, well-lit edges that provide welcoming, everyday public space and potential gathering areas in emergencies. Together, the Project reduces environmental risk, builds redundancy into critical operations, and supports a safer, more adaptable neighborhood.

The Project may leverage District tools where appropriate (e.g., public capital, PUD flexibility, or other incentives) to maximize community benefits and promote equitable economic development in the Planning Area (FSS-1.1.13). The Project will be designed to create opportunities within the facility for job training, career-ladder skills development, and apprenticeship partnerships related to public safety and building operations, improving pathways to stable employment for nearby residents (FSS-1.1.10). In addition, the Project's approach to climate and community resilience will integrate neighborhood-scale and site-specific solutions that reduce vulnerability to climate risks, including enhanced landscaping, shade, and stormwater features (FSS-1.1.13, FSS-1.1.14; FSS-1.1.15), and by contributing built interventions that lower exposure of people, facilities, and local businesses to current and future flooding and heat risks (FSS-1.2.A).

Parking and Loading Management

Parking and loading are fully internalized on the Property, with all access and service functions located off-street to reduce conflicts with pedestrians and to preserve curb space (FSS-1.1.8). By meeting on-site demand, including for community-serving meetings and programming within the building, the garage will relieve pressure on neighborhood curbside spaces where

residents have expressed long-standing concerns about spillover parking on local streets (10-A DCMR § 1807.3). Because the Property has long operated as an MPD facility, the redevelopment is not expected to materially alter traffic patterns; access points will generally rely on existing curb cuts, thereby limiting new turning movements and maintaining familiar circulation (FSS-1.1.8). A transportation analysis will be submitted into the record to document projected trip generation, queuing, and recommended transportation demand management measures, ensuring any localized impacts are identified and mitigated (FSS-1.1.8).

In sum, by internalizing parking and loading to relieve neighborhood curbs, maintaining familiar circulation with limited new curb cuts, adding workforce-development capacity, and delivering robust sustainability and resilience features, including green infrastructure and extensive on-site solar, the Application is not inconsistent with, and materially advance, the FSS Area Element’s priorities for equitable economic development, sustainable growth, and neighborhood resilience.

The application specifically advances the following FSS Area Element policies:

FSS-1.1 Guiding Growth and Neighborhood Conservation

- FSS-1.1.8: Parking
- FSS-1.1.10: Workforce Development Centers
- FSS-1.1.13: District Government Incentives for Economic Development
- FSS-1.1.14: Sustainable Development
- FSS-1.1.15: Neighborhood Resilience
- FSS-R.1.1.A: Resilient Public Facilities –

FSS-1.2 Conserving and Enhancing Community Resilience

- Action: FSS-1.2.A: Far Southeast/Southwest Climate Resilience

e. CITYWIDE ELEMENTS

i. LAND USE ELEMENT

The Land Use Element is the cornerstone of the Comp Plan. It establishes the basic policies guiding the physical form of the city, and provides direction on a range of development, conservation, and land use compatibility issues. The Land Use Element describes the balancing of priorities that must take place to accommodate a multiplicity of land uses within the boundaries of the District. *See* 10-A DCMR § 300.1.

The Application is consistent with the Comp Plan’s Land Use Element by modernizing a public facility in a transit-accessible location (LU-1.4.9). The Project would situate a civic use along a corridor with access to Metrobus routes C21, C25, C26, C27, C53, and D10, improving accessibility and reinforcing its role as a neighborhood anchor. These bus routes increase accessibility to the Property by providing connections to three different Metrorail stations just over one mile away from the Project: Congress Heights, Southern Avenue, and Naylor Road Metrorail stations.

The Project will introduce a modernized civic facility on an underutilized Property in a manner that complements the surrounding low-density neighborhood (LU-2.1.1). Careful massing, setbacks, and transitions will ensure compatibility with adjacent residential character, which consists of garden apartments, semi-detached, and detached housing typologies (LU-2.1.5) Single-family homes line Knox Street and Knox Terrace, SE, while multifamily apartment buildings are located west of Alabama Avenue and farther north, including the recently opened Aspire apartment building. Religious uses nearby include the Faith Tabernacle of Prayer Church directly north of the Property, as well as Young's Memorial Church and Allen Chapel Church to the northwest. Institutional and civic resources include Garfield Elementary School to the south, local childcare centers, the Fort Stanton Recreation Center, the Frederick Douglass National Historic Site, and the District's Engine Company 32/Truck Company 16 fire station on Irving Street, SE. The Irving Street interchange with Suitland Parkway facilitates regional access. The Project will enhance the visual quality of the neighborhood through streetscape improvements, landscaping, high-quality architectural design, and sustainable features (LU-2.2.4).

The Project delivers tangible, everyday benefits to Ward 8 by pairing a modern public-safety facility with spaces and operations that directly serve the neighborhood (LU-1.4.9). In addition to upgraded MPD work areas, the building includes a reservable multi-purpose community room for civic meetings, youth programs, and neighborhood events, ensuring the headquarters functions as both a policing center and a community asset (LU-1.4.9; LU-2.1.1; LU-2.1.2). Parking that currently spills onto local streets will be consolidated within a new secure garage, maintaining the long-standing supply (225 spaces) while improving site access and circulation, so congestion is reduced and pedestrian and bicycle safety are enhanced. Dedicated parking garage spaces will also be available for community use to support on-site gatherings and nearby activities (LU-1.4.9). By eliminating most surface parking, expanding landscaping, and enabling rooftop and vertical solar, the Project further improves environmental performance. Collectively, these features reinforce the 7th District as a visible civic anchor that relieves neighborhood parking pressure and provides welcoming, programmed space for residents (LU-1.4.9; LU-2.3.1).

The Project will direct substantial public investment into a neighborhood with demonstrated needs, including higher rates of poverty, unemployment, and crime (LU-2.1.2). By modernizing civic infrastructure, the Project will advance equitable development objectives, improve safety and accessibility, and enhance public facilities that serve residents most directly. These improvements reflect the District's commitment to revitalization through targeted capital investment, while also addressing racial equity considerations by strengthening resources in historically underserved communities.

Further, the Project will balance revitalization with the preservation of neighborhood character (LU-2.1.3). The design strengthens the civic identity of the neighborhood, improves a public facility, and enhances environmental performance, while ensuring compatibility with surrounding residential and neighborhood-serving institutional uses. In doing so, the Project will contribute to the broader District-wide goals of fostering vibrant, inclusive neighborhoods and meeting public facility needs, reinforcing the importance of every neighborhood's role in advancing equity, sustainability, and livability.

The Project strengthens public safety by providing MPD with a modern headquarters that replaces facilities no longer adequate for current operations (LU-1.4.9). The new building improves efficiency for officers while creating a more secure and functional base for neighborhood policing. At the same time, the design integrates cultural and civic elements, including public art, a landscaped plaza, and multipurpose rooms accessible for community meetings and events. These features highlight the role of the Headquarters as both a center for public safety and a visible civic resource that reflects the identity and pride of the surrounding neighborhood (LU-2.1.3).

Finally, the Project adheres to the Comp Plan's guidance for non-residential uses in residential areas, as the proposed MPD facility will be scaled appropriately and buffered through landscaping and design measures to avoid adverse impacts on adjacent residential properties (LU-2.3.1, LU-2.3.3).

The Application specifically advances the following Land Use Element policies:

LU-1.4 Transit-Oriented and Corridor Development

- LU-1.4.9: Public Facilities

LU-2.1 A District of Neighborhoods

- LU-2.1.1: Variety of Neighborhood Types
- LU-2.1.2: Neighborhood Revitalization
- LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods
- LU-2.1.5: Support Low-Density Neighborhoods

LU-2.2 Maintaining Community Standards

- LU-2.2.4: Neighborhood Beautification

LU-2.3 Residential Land Use Compatibility

- LU-2.3.1: Managing Non-Residential Uses in Residential Areas
- LU-2.3.3: Buffering Requirements

ii. COMMUNITY SERVICES AND FACILITIES ELEMENT

The Community Services and Facilities Element contains policies and actions for public facilities that provide health and older adult care services, as well as community facilities that include libraries, police stations, fire stations, and other municipal facilities such as maintenance yards. A well-balanced and adequate public facility system is a key part of Washington, DC's drive to sustain and enhance the quality of life for its residents and to deliver services on an equitable and inclusive basis, supporting growth and prosperity, resilience, public health and safety, civic gathering, learning, and cultural production and expression. *See* 10-A DCMR § 1100.1.

The proposed MPD facility is consistent with the Comp Plan's Community Services and Facilities Element because it will modernize public safety infrastructure, replace an obsolete facility, and create an opportunity for shared community use. The Project will provide a modernized police station that ensures the efficient delivery of services to current and future District residents (CSF-1.1.2). It also replaces a building that can no longer be cost-effectively rehabilitated, ensuring land and resources are put to better use (CSF-1.1.5).

The Property’s FLUM designation as Local Public Facilities confirms that civic and institutional uses are anticipated along the Alabama Avenue corridor. Reconstructing the replacement MPD station in this planned civic area preserves land-use compatibility, improves access to transit, and strengthens integration with nearby residential and neighborhood-serving uses (CSF-1.1.7). The Project will include a multi-purpose space for community programming, enhancing the social and civic role of a District-owned building (CSF-1.1.12). Moreover, the Project reflects coordinated investment that maximizes community benefit through construction phasing while avoiding costly service disruptions (CSF-1.2.3). Overall, the Project will be a state-of-the-art new police station that meets the public safety needs of residents, workers, and visitors while strengthening the civic identity of the corridor (CSF-4.1.1).

In sum, the Project embodies the Comp Plan’s goals for modern, accessible, and community-serving public facilities by delivering a new MPD station that will enhance service delivery, support equity, and provide long-term value to the surrounding neighborhoods.

The application specifically advances the following Community Services and Facilities Element policies:

CSF-1.1 Long-Term Planning for Public Facilities

- CSF-1.1.2: Adequate Facilities
- CSF-1.1.5: Addressing Facilities That Are Functionally Obsolete
- CSF-1.1.7: Location of Facilities
- CSF-1.1.12: District-Owned Facilities and Shared Uses

CSF-1.2 Funding and Coordination

- CSF-1.2.3: Construction and Rehabilitation

CSF-4.1 Police Facilities and Services

- CSF-4.1.1: Updated Police Facilities

iii. 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. These policies are complemented by policies in the Land Use, Urban Design, and Environmental Protection Elements on related topics, such as air quality and the management of public space. Recognizing the interplay between transportation and these related topics is critical to improving safety, mobility, and accessibility in the District. *See* 10-A DCMR § 400.1.

The proposed MPD facility is consistent with the Comp Plan’s Transportation Element by supporting equitable access, transit use, and pedestrian safety. The Project is located along a corridor served by multiple bus routes, including C21, C25, C26, C27, C29, C53, and D10, with direct connections to three nearby Metrorail stations that include Congress Heights, Southern Avenue, and Naylor Road (T-1.1.7). The facility’s location ensures accessibility for residents, workers, and visitors of all ages, incomes, and abilities, while advancing the District’s commitment to reducing historic inequities in access to government services.

The locating of an employment-generating civic facility near underutilized Metrorail stations encourages greater use of existing transit infrastructure and improves access to jobs and services for low-income residents (T-1.3.1). See [Metrorail Ridership](#). In addition, the Project supports pedestrian safety through streetscape improvements, ADA-compliant curb ramps, seating, and enhanced lighting, which will create a safer, more accessible pedestrian environment (T-2.4.1, T-2.4.2). The Project incorporates new tree plantings, landscape buffers, and stormwater features that enhance the pedestrian experience while contributing to environmental sustainability (T-2.5.5).

Finally, the Project will promote sustainable travel through implementation of a Transportation Demand Management plan coordinated with the District Department of Transportation (“DDOT”) that will include secure long-term bicycle parking and visitor racks (T-3.1.1). Together, these features demonstrate the Project’s alignment with the Comp Plan’s transportation goals of equity, sustainability, and multimodal accessibility. In addition, the Applicant is working with DDOT to establish an extensive and site-specific TDM plan that will fully address any potentially adverse traffic impacts. These measures, combined with the provision of secure bicycle parking, upgraded sidewalks, and improved pedestrian connections, will ensure that transportation impacts remain manageable and acceptable when weighed against the Project’s significant public benefits.

The application specifically advances the following Transportation Element policies:

T-1 Linking Land Use and Transportation

- T-1.1.7: Equitable Transportation Access

T-1.3 Regional Smart Growth Solutions

- T-1.3.1: Transit-Accessible Employment

T-2.4 Pedestrian Access, Facilities, and Safety

- T-2.4.1: Pedestrian Network
- T-2.4.2: Pedestrian Safety

T-2.5 Roadway System and Auto Movement

- T-2.5.5: Natural Landscaping

T-3.1 Transportation Demand Management

- T-3.1:1: TDM Programs

iv. ENVIRONMENTAL PROTECTION ELEMENT

The Environmental Protection Element addresses the protection, conservation, and management of Washington, DC’s land, air, water, energy, and biological resources. This Element provides policies and actions for addressing important 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. The biological, chemical, and hydrologic integrity of the environment are

key indicators of the quality of life in the District. Furthermore, environmental sustainability is linked to resilience, population health, and community prosperity. Good environmental management and pollution prevention are essential to sustain all living things and to safeguard the welfare of future generations. *See* 10-A DCMR § 600.

The proposed MPD facility is consistent with the Comp Plan's Environmental Protection Element by integrating climate resilience, sustainable design, and green infrastructure strategies into the site and building program that includes a green roof, perimeter landscaping, new trees, bioretention areas, permeable surfaces, and an abundance of solar panels on the roof of the garage and the south building elevation of the garage (E-3.2.3).

The Project replaces an aging building and surface parking with a modern facility and parking garage, improving site conditions and ensuring compliance with the RA-2 zone's green area ratio requirements. Consolidating parking within the structure reduces impervious surface and allows for new perimeter landscaping, street trees, and a landscaped civic plaza that will enhance stormwater retention and improve the pedestrian environment (E-4.1.1).

The proposed Project will incorporate green roofs, reflective roofing materials, solar panels, and substantial landscape along the Property perimeter (E-1.1.2). These features directly reduce localized heat island effects, especially important in a neighborhood with higher concentrations of heat-vulnerable residents. Similarly, by designing the facility's open spaces and landscaping to serve multiple purposes, including stormwater retention, shade provision, and climate resilience, the Property's ability to withstand extreme heat and severe weather is strengthened (E-1.1.5).

Tree protection and expansion are also central to the Project's design. The Project includes the preservation of viable existing trees where possible, the replacement of unhealthy trees, and the introduction of new canopy species that contribute to the District's 40 percent canopy target (E-2.1.2, E-2.1.6). The landscaping plan incorporates provisions for maintenance to ensure long-term survival and growth. Further, the Project exhibits sustainable landscaping practices by planting primarily native species, using low-maintenance landscape treatments, incorporating bioretention areas, and coordinating with District standards to reduce runoff and enhance neighborhood identity (E-2.1.3).

The proposed Project also supports renewable energy and resource efficiency. The building will be designed to achieve LEED Gold certification under the LEED v4 Green Building Design and Construction (GBDC) rating system and will incorporate an abundance of renewable energy infrastructure and energy-efficient systems (E-3.2.3). These features lower operating costs while advancing District-wide sustainability objectives.

Stormwater management and permeability are also addressed comprehensively. The Project will advance water runoff strategies through the use of permeable paving, bioretention areas, and landscaped buffers designed to capture and filter stormwater onsite (E-4.1.1, E-4.1.2). Green roofs and expanded landscaping, including new trees, further mitigate runoff while providing heat island and aesthetic benefits. The Project ensures that development impacts will be mitigated through best practices in construction and site design, resulting in environmental enhancements rather than degradation (E-4.4.1).

Finally, the Project will incorporate green infrastructure best management practices into the site plan and will provide sustainable landscaping methods that minimize water use and enhance habitat value (E-7.1.1, E-7.1.3). Together, these measures demonstrate the Project's commitment to environmental stewardship and consistency with the District's goals for resilient, sustainable, and equitable development.

In sum, the Project embodies the Comp Plan's Environmental Protection Element by mitigating heat island effects, strengthening resilience, protecting and expanding tree canopy, reducing stormwater runoff, promoting renewable energy, and adopting sustainable landscaping and green building practices.

The application specifically advances the following Environmental Protection Element policies:

E-1.1 Preparing for and Responding to Natural Hazards

- E-1.1.2: Urban Heat Island Mitigation
- E-1.1.5: Resilient Infrastructure

E-2.1 Conserving and Expanding Washington, DC's Urban Forests

- E-2.1.2: Tree Requirements in New Development
- E-2.1.3: Sustainable Landscaping Practices
- E-2.1.6: Urban Tree Canopy Goals

E-3.2 Conserving Energy and Reducing GHG Emissions

- E-3.2.3: Renewable Energy

E-4.1 Green Infrastructure GI

- E-4.1.1: Maximizing Permeable Surfaces
- E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff

E-4.4 Reducing the Environmental Impacts of Development

- E-4.4.1: Mitigating Development Impacts

E-7.1 Greening the Government

- E-7.1.1: GI and Green Building Methods for the District
- E-7.1.3: Sustainable Landscaping

V. URBAN DESIGN ELEMENT

The Urban Design Element addresses the District's physical design and visual qualities. The element describes the ways in which different aspects of the District's landscape, especially its buildings, streets, and open spaces, work together to define impressions of Washington, DC and its neighborhoods. The design and appearance of physical space can create connections or barriers. It can create a sense of safety or a sense of discomfort. Ultimately, urban design shapes

perceptions of the District and contributes to the way people interact with and experience the environment around them. 10-A DCMR § 900.1.

The proposed MPD facility is consistent with the Comp Plan's Urban Design Element by integrating civic architecture, high-quality streetscape design, and community-serving amenities.

The proposed MPD facility frames Alabama Avenue, SE with landscaped setbacks, street trees, and pedestrian-scaled design elements that reinforce the corridor's identity while creating a verdant, park-like edge (UD-1.1.7, UD-1.4.1). The building's height, which respects the sloping topography, and setbacks are designed to respect the surrounding context (UD-2.2.5).

The Project will maintain sidewalks, provide pedestrian lighting, and incorporate accessible connections between the public realm and the community multi-purpose space, which will serve as a gathering place for neighborhood residents (UD-2.1.2, UD-2.1.4). The design sensitively integrates required security features into the landscape, such as lighting and bollards, ensuring a welcoming and pedestrian-friendly environment (UD-3.1.2).

Finally, by including multi-purpose space for neighborhood use and by employing durable, high-quality materials and sustainable features, the facility will be established as a long-term civic landmark and source of neighborhood pride (UD-3.2.2, UD-3.3.1, UD-4.1.1, UD-4.1.2, UD-4.1.7).

The application specifically advances the following Urban Design Element policies:

UD-1.1 Building on Washington, DC's Historic Plan

- UD-1.1.7: Public Space Landscape

UD-1.4 Enhancing Thoroughfares and Gateways

- UD-1.4.1: Thoroughfares and Urban Form

UD-2.1 Streets for People

- UD-2.1.2: Neighborhood Streetscapes
- UD-2.1.4: Connections Between Public Spaces and Streets

UD-2.2 Designing for Vibrant Neighborhoods

- UD-2.2.5: Infill Development

UD-3.1 Public Life for All

- UD-3.1.2: Security Features in Public Space

UD-3.2 Designing the Active District

- UD-3.2.2: Social and Community Meeting Spaces

UD-3.3 Places for Linger

- UD-3.3.1: Neighborhood Meeting Places

UD-4.1 The Design of Public Buildings, Public Spaces, and Infrastructures

- UD-4.1.1: Capital Improvements and Urban Design

- UD-4.1.2: Design Excellence
- UD-4.1.7: Design for Longevity

vi. ECONOMIC DEVELOPMENT

The Economic Development Element addresses the future of Washington, DC’s economy and the creation of economic opportunity for current and future District residents. It includes strategies to sustain the District’s major industries, diversify the economy, accommodate job growth, maintain small businesses and neighborhood commercial districts, and increase access to employment for District residents. *See* 10-A DCMR § 700.1.

The proposed MPD facility is not inconsistent with the Comp Plan’s Economic Development policies because modernizing a major public-safety facility sustains government employment and related administrative support services, which are core components of the District’s economy, and strengthens demand for local suppliers of maintenance, IT, janitorial, food services, and other operational needs (ED-1.1.1; ED-1.1.2). By improving a key civic asset in a transit-served corridor, the Project reinforces business fundamentals, including public safety, reliability, and access, thereby supporting the District’s competitive position within regional and national markets (ED-1.1.6).

The facility’s multi-purpose community room and training spaces will provide an opportunity to host education and workforce programs that blend basic skills remediation with occupational training and experiential learning (ED-4.1.4). The Property will also be designed with the ability to host mentoring, tutoring, explorer/cadet, and after-school programming delivered with nonprofits and major employers, expanding learning opportunities beyond the classroom, and enabling coordinated initiatives among education, human services, juvenile justice, and workforce agencies to reduce barriers to employment for local youth (ED-4.1.5; ED-4.1.6). Consistent with these objectives, the facility will be designed to be able to accommodate job placements to connect District students and young adults with career-track exposure (Action ED-4.1.B).

By leveraging strong transit accessibility and customary local hiring commitments for District projects, the MPD facility can increase the share of District jobs held by District residents and expand entry-level pathways suited to lower-income youth, adults, and persons with disabilities, complemented by predictable schedules and transit access (ED-4.2.1; ED-4.2.6). The associated public-sector and contracted positions typically offer stable, living-wage employment and opportunities for advancement through on-site training, apprenticeships, and defined career ladders, thereby supporting upward mobility (ED-4.2.7; ED-4.2.9). As a District facility, hiring and service delivery will be administered in compliance with the DC Human Rights Act, advancing equal opportunity, while the corridor location improves transportation access between neighborhoods with higher unemployment and District employment centers (ED-4.2.13; ED-4.3.1).

The application specifically advances the following Urban Design Element policies:

ED-1.1 Diversifying the Economic Base

- ED-1.1.1: Core Industries
- ED-1.1.2: Economic Linkages

- ED-1.1.6: Competitive Edge

ED-4.1 Linking Education and Employment

- ED-4.1.4: Adult Education
- ED-4.1.5: Learning Outside the Classroom
- ED-4.1.6: Agency Coordination
- Action ED-4.1.B: Expanded Youth Services

ED-4.2 Increasing Workforce Development Skills

- ED-4.2.1: Linking Residents to Jobs
- ED-4.2.6: Entry-Level Opportunities
- ED-4.2.7: Living-Wage Jobs
- ED-4.2.9: Upward Mobility
- ED-4.2.13: Equal Opportunity Compliance

ED-4.3 Getting to Work

- ED-4.3.1: Transportation Access to District Jobs

f. ANALYSIS OF POTENTIAL INCONSISTENCIES WITH THE COMPREHENSIVE PLAN

Notwithstanding the numerous policies within the Comp Plan’s city-wide and area elements that the Application would advance, an analysis of potential inconsistencies with the Comp Plan is also necessary to demonstrate that the Application is not inconsistent with the Comp Plan. 11-X DCMR § 500.3. As established by the D.C. Court of Appeals, it is not sufficient to simply identify the policies that would be advanced when evaluating a proposal for consistency with the Comp Plan. Rather, because of the overlap within and between the elements, the evaluation must also recognize where there may be potential inconsistencies. *Friends of McMillan Park v. District of Columbia Zoning Comm’n*, 149 A.3d 1027, 1035 (D.C. 2016).

Since first being adopted by the D.C. Council, the Comp Plan has always recognized that there is intentional overlap between its individual components (elements), and that it is intended to be a policy framework that is to be interpreted broadly and provide guidance to all executive and legislative decision making. The first Comp Plan, adopted in 1984, stated that “[t]he primary dynamic of the District elements of the [Comp] Plan are the overlapping of its elements’ goals. This overlapping is intentional.” *See* Section 102, District of Columbia Comprehensive Plan Act of 1984. The current Implementation Element reflects the same language: “[r]ecognize the overlapping nature of the Comprehensive Plan elements as they are interpreted and applied. An element may be tempered by one or more of the other elements.” *See* 10-A DCMR § 2504.6.

In the event there are inconsistencies, an explanation must be provided as to why said inconsistencies are outweighed by the advancement of other policies and considerations. A “roadmap” of sorts for evaluating a proposal’s consistency with the Comp Plan can be found in the Court’s initial review of the McMillan PUD:

The Comprehensive Plan is a “broad framework intended to guide the future land use planning decisions for the District.” *Wisconsin-Newark Neighborhood*

Coal. v. District of Columbia Zoning Comm'n, 33 A.3d 382, 394 (D.C. 2011) (internal quotation marks omitted). “[E]ven if a proposal conflicts with one or more individual policies associated with the Comprehensive Plan, this does not, in and of itself, preclude the Commission from concluding that the action would be consistent with the Comprehensive Plan as a whole.” *Durant v. District of Columbia Zoning Comm'n*, 65 A.3d 1161, 1168 (D.C. 2013). The Comprehensive Plan reflects numerous “occasionally competing policies and goals,” and, “[e]xcept where specifically provided, the Plan is not binding.” *Id.* at 1167, 1168 (internal quotation marks omitted). Thus “the Commission may balance competing priorities in determining whether a PUD is consistent with the Comprehensive Plan as a whole.” *D.C. Library Renaissance Project/West End Library Advisory Grp. v. District of Columbia Zoning Comm'n*, 73 A.3d 107, 126 (D.C. 2013). “[I]f the Commission approves a PUD that is inconsistent with one or more policies reflected in the Comprehensive Plan, the Commission must recognize these policies and explain [why] they are outweighed by other, competing considerations.” *Friends of McMillan Park v. District of Columbia Zoning Comm'n*, 149 A.3d 1027, 1035 (D.C. 2016) (brackets and internal quotation marks omitted).

As discussed above, the FLUM designates the Property Local Public Facilities and the GPM designates the Property as Federal Lands. The Applicant has carefully evaluated the proposed rezoning for potential inconsistencies with the Comp Plan and finds that it is largely not inconsistent with the Plan’s policies and objectives. The analysis identifies one area of potential inconsistency that is limited in scope and addressed in detail below. To the extent the Commission were to conclude that the proposal is inconsistent with additional individual policies, the Applicant submits that such inconsistencies are clearly outweighed by the Project’s consistency with the FLUM, the GPM, the FSS Area Element, and Citywide Elements that include Land Use, Community Service Facilities, Transportation, Environmental Protection, Urban Design, and Economic Development. Collectively, these guiding components of the Comp Plan demonstrate that the Project will meaningfully advance the District’s policy objectives.

i. T-1.1.8: MINIMIZE OFF-STREET PARKING

The Project could potentially be found to be inconsistent with Policy T-1.1.8 (Minimize Off-Street Parking) because it proposes 225 structured spaces, more than the zoning minimum, which could otherwise encourage additional vehicle trips.

That said, this inconsistency is outweighed by countervailing objectives and mitigation: the parking garage primarily consolidates long-standing MPD fleet and staff parking that today occupies surface lots and spills onto neighborhood streets, rather than creating a new supply for general public use; parking will be capped and managed (allocated to essential operations, monitored, and priced/limited as appropriate) to avoid trip inducement; a robust TDM package (secure long-/short-term bike parking, transit/carpool supports, curb-management and PUDO planning, and EV-ready/fleet electrification) is committed to reduce demand; and site design internalizes circulation and queuing, limits curb cuts, and upgrades sidewalks, improving pedestrian safety and returning curb space to community needs. On balance, the structured, managed, and operationally necessary parking reduces on-street conflicts and spillover, advances

safety and access to a critical public facility, and aligns with broader Comp Plan goals even while it departs from the strict minimization preference in Policy T-1.1.8.

VI. PART TWO: COMMUNITY OUTREACH AND ENGAGEMENT

The Zoning Commission expects Comp Plan analysis submissions to include a detailed discussion **from the Applicant** on community outreach and engagement efforts.

a. IMPACTED COMMUNITY(IES)

The Application for 2455 Alabama Avenue, SE will directly serve and strengthen the Garfield Heights and Knox Hill/Buena Vista neighborhoods, both of which are primarily residential communities with strong cultural, recreational, and educational assets. Buena Vista, with its unique topography and proximity to the Frederick Douglass National Historic Site, Anacostia Park, and the Barry Farm Recreation and Aquatics Center, is complemented by Knox Hill's tree-lined streets, midcentury and newer homes, and access to Fort Stanton and Hillcrest recreation facilities. Together, these neighborhoods reflect Ward 8's historic character and its ongoing revitalization.

The addition of a modern police facility with a multi-purpose community room will bring new public resources, enhanced safety, and valuable gathering space to the heart of these neighborhoods. By improving services along Alabama Avenue, SE reinforced by connections to nearby transit, schools, and recreation centers, the proposed Project advances the District's goals of equitable service delivery and neighborhood investment, ensuring that Garfield Heights and Knox Hill/Buena Vista neighborhoods continue to grow as thriving, well-supported communities.

b. ANALYSIS OF PAST AND PRESENT RACIAL DISCRIMINATION / HARM

The history of Buena Vista and Knox Hill is deeply intertwined with the racialized housing policies and discriminatory practices that shaped much of Washington, D.C. For decades, Black residents were excluded from many neighborhoods through the use of racially restrictive covenants, which barred Black residents from purchasing or renting homes. *See* mappingsegregationdc.org. These covenants effectively assigned value to entire neighborhoods based on the race of their residents, and their presence reinforced patterns of segregation across the city. *Id.* As Black families began to challenge these restrictions, their victories set the stage for demographic and geographic shifts across the District. *Id.*

After decades of lawsuits filed by Black home seekers, the Supreme Court ruled in 1948 that enforcement of racial covenants violated the Constitution. *See* mappingsegregation.org. By 1950, Black residents had begun moving into formerly restricted blocks north of Park Road NW, which had long served as a racial dividing line. *Id.* Meanwhile, longstanding Black communities in Tenleytown and along Chain Bridge Road disappeared under pressure from discriminatory redevelopment. *Id.* By 1960, Black residents had gained access to many areas of the city once off-limits to them. However, thousands displaced by urban renewal projects in Southwest were forced to relocate to neighborhoods east of the Anacostia River, including Buena Vista and Knox Hill, where they settled on blocks that had historically been restricted. *Id.*



FIGURE 5: RACIAL MAKEUP, 1950

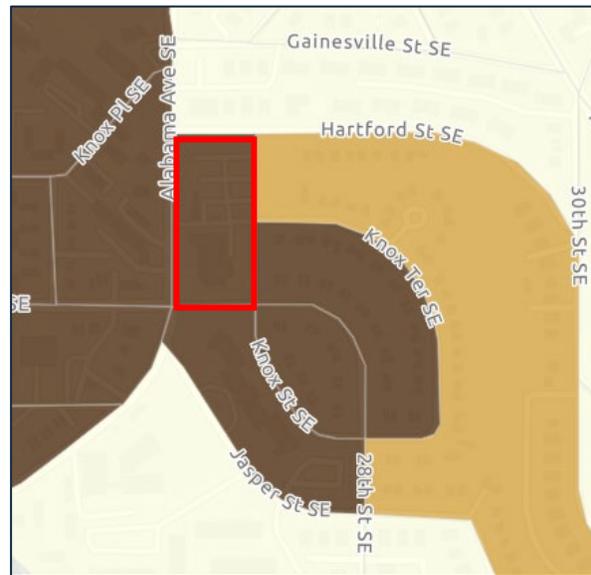
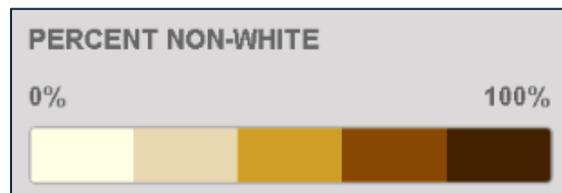


FIGURE 4: RACIAL MAKEUP, 1960



The impact of these discriminatory policies was compounded by white flight. As Black residents moved into areas once restricted, white families often left neighborhoods they perceived as declining in value. See mappingsegregationdc.org. Many relocated either to the suburbs or to different parts of the city, while

some moved into areas that historically had significant Black populations, such as Georgetown and Foggy Bottom. *Id.* This pattern of displacement and resettlement not only entrenched racial segregation east of the Anacostia River but also contributed to disinvestment in neighborhoods like Buena Vista and Knox Hill. *Id.*

Today, the legacy of this history remains visible. Buena Vista and Knox Hill are both part of Ward 8, an area long characterized by limited economic opportunity, high renter rates, and a persistent racial wealth gap. See [Discriminatory Housing Practices in the District – A Brief History](#). Patterns of historic discrimination continue to shape present conditions: housing affordability remains a critical challenge, residents experience fewer economic opportunities than in other parts of the District, and systemic underinvestment has constrained access to amenities. *Id.* While recent development activity and revitalization efforts have begun to bring new resources to these neighborhoods, they remain deeply affected by the enduring consequences of past racial discrimination in land use, housing, and urban planning. *Id.*

Consequently, these conditions intersect with ongoing public-safety challenges, including elevated concerns about violent crime and neighborhood safety reported by residents and stakeholders. *Id.* A modernized MPD facility can help address these issues by strengthening community-oriented policing, improving coordination with violence-interruption and victim-services partners, reducing response times through updated operations, and providing a safe, multi-purpose community space for youth programming and engagement. While no single facility can resolve the complex root causes of crime, this targeted public-safety investment—paired with

broader social and economic initiatives—can support safer, more stable neighborhood conditions and help mitigate the enduring effects of past discrimination.

c. SUMMARY OF COMMUNITY OUTREACH EFFORTS

The Property is located within the boundaries of ANC 8B, which is the only “affected” ANC in this case. The community outreach to date is summarized below:

- **Late 2024 through 2025** – Applicant’s outreach began in 2024 and has continued through 2025;
- **January 23, 2025** - The Applicant met with OP to review the redevelopment/phasing and consistency with FLUM (Local Public Facilities) and GPM (Federal Lands); continued engagement with OP and other District agencies is planned;
- **February, 2025** – DGS attended the regularly scheduled and duly noticed public meeting of ANC 8B, during which it announced the commencement of the Project and its intention to return and formally present the building design and evaluate community benefits;
- **April 15, 2025** – On Apr. 15, 2025, MPD presented renderings, site plans, and operational objectives at ANC 8B’s regular public meeting; community questions were addressed, and the majority of attendees expressed strong support for a modern, community-accessible facility;
- **May 2025** – ANC 8B issued letter of support for the Project;
- **June 2025** – The Applicant issued a Notice of Intent to file the Application to the affected ANC and to the owners of property located within 200 feet of the Property;
- **June 30, 2025** - ANC 8B issued a support letter dated June 30, 2025, noting public safety, operational, and civic-engagement benefits and reporting a unanimous 6–0 vote in favor of the Application; and
- **August 2025** – DGS engaged ANC 8B and the 7th District Citizens Advisory Council (“CAC”) to open discussions on the planned Community Benefits Agreement.

The Applicant will continue to engage the community throughout the Application process and will provide an update to the Commission prior to the public hearing.

d. COMMUNITY PRIORITIES AND IMPACT ON THE ZONING ACTION

During the 2006 Comp Plan revision process, residents and stakeholders from the FSS Planning Area identified key challenges and priorities related to growth, neighborhood character, and institutional impacts.

- **Education, Jobs, and Social Services:** Improving the educational system and expanding job and vocational training are critical to reducing Ward 8’s historically high dropout and unemployment rates. Expanded adult education, job training programs, and social service facilities are needed to alleviate poverty and under-employment. Establishing a community college or a UDC branch east of the Anacostia River, paired with reliable transit access to jobs across the region, would help prepare residents for quality employment opportunities.

- **Public Safety and Community Facilities:** Residents identified drug use and violence as pressing concerns. While complex in origin, these issues can be addressed in part through greater investment in schools, libraries, child care centers, recreation centers, parks, and health clinics. Modernization of schools such as Anacostia High, Ketcham, Birney, Savoy, and Ballou, as well as reconstruction of the Anacostia and Washington Highlands Libraries, should anchor revitalization efforts and serve as the foundation of neighborhood economic development.
- **Retail and Economic Development:** Residents emphasized the need for more retail services, particularly supermarkets, sit-down restaurants, gas stations, and hardware stores to reduce reliance on Prince George’s County. Investments at centers such as Camp Simms, and along corridors including Martin Luther King Jr. Avenue SE, Good Hope Road SE, Alabama Avenue SE, and South Capitol Street SE, should include façade and streetscape improvements as well as upgraded transit access to attract new businesses and create jobs.
- **Transportation and Connectivity:** Traffic congestion, largely from cut-through commuters, and unsafe driving remain major concerns. Residents support traffic calming, stronger pedestrian safety measures, and improved public transit options. With nearly half of households lacking cars, reliable Metrobus and Metrorail service is critical. Concerns have also been raised that new projects, such as the Anacostia streetcar, may reduce bus service across the river.
- **Environmental Quality:** Protecting the area’s hilly topography, scenic ridgelines, and natural environment is a priority, alongside addressing illegal dumping and promoting better environmental stewardship.

10-A DCMR § 1807.3

The proposed Project advances priorities identified in the FSS Area Element and is informed by recent community feedback gathered through ANC briefings and stakeholder listening sessions. Residents consistently asked that MPD operations be consolidated on-site to reduce fleet activity on neighborhood streets. In response, the Project provides structured parking and internalized site circulation, including on-site queuing and controlled access points, so MPD vehicles are stored and routed within the site rather than circulating or parking on nearby blocks. These operational choices directly address concerns about noise, safety, and curb congestion while maintaining reliable public-safety response times.

Programmatically, the Project pairs a modernized public safety facility with a community-serving multi-purpose room that will be accessible to the public for meetings, which could include activities such as youth mentoring, after-school programming, and workforce/skills trainings. This space can be scheduled in coordination with local organizations and ANCs, providing a flexible venue that complements nearby schools, libraries, and recreation centers. Together, these elements respond to community requests for safe, high-quality civic amenities, while aligning with Comp Plan goals to strengthen educational and social-service infrastructure and reduce the secondary impacts of institutional uses on residential streets.

In addition, the Project reinforces Alabama Avenue, SE as a civic and community corridor, signaling equitable public investment in the Garfield Heights and Knox Hill/Buena Vista neighborhoods. The Property’s transit-accessible location supports policies calling for better connections between residents and jobs while reducing reliance on automobiles. With careful design and sustainable site improvements, the facility also contributes to broader environmental goals. Overall, the Project represents a long-term investment in neighborhood stability, safety, and opportunity consistent with the Comp Plan’s vision for Ward 8.

VII. PART THREE: DISAGGREGATED DATA REGARDING RACE AND ETHNICITY

The Zoning Commission expects disaggregated race and ethnicity data from the Office of Planning in every Comp Plan analysis submission that analyzes a zoning action. Any additional information requested by the Zoning Commission will be provided.

VIII. PART FOUR: ZONING COMMISSION EVALUATION

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?*

The table below indicates how the proposed Application will generally result in positive outcomes when considered through several racial equity themes, as it has the potential to address a number of equity issues that residents in the FSS Planning Area are experiencing. Throughout the processing of this Application, the Applicant will continue engaging with the affected ANC and community stakeholders.

Evaluation of Equitable Development Indicators			
Indicator	Measure	Outcome / Applicable Public Benefit	Favorable Impact/ Minimal Impact/ Neutral Impact /Potentially Unfavorable Impact
Displacement			
Physical	<ul style="list-style-type: none"> · Displacement due to redevelopment. 	<ul style="list-style-type: none"> · Displacement will not occur, as the Property is currently improved with an MPD facility and surface parking and will be redeveloped with a new, modernized MPD facility and parking garage. 	<p>Minimal Impact</p> <ul style="list-style-type: none"> · Site is already a civic use. · No on-site residents or private businesses to relocate. · Short term access and traffic impacts during construction.

Evaluation of Equitable Development Indicators			
Indicator	Measure	Outcome / Applicable Public Benefit	Favorable Impact/ Minimal Impact/ Neutral Impact /Potentially Unfavorable Impact
Economic	<ul style="list-style-type: none"> Displacement due to housing cost increases. 	<ul style="list-style-type: none"> The Project is unlikely to cause any meaningful displacement through housing cost increases, though, as with any public investment, it could contribute modestly to broader neighborhood change over time. 	<p>Minimal Impact</p> <ul style="list-style-type: none"> Civic replacement-in-kind project, not new market rate housing or destination retail that can result in rent increases. No direct displacement and limited change in local housing demand attributable to the Project itself.
Cultural	<ul style="list-style-type: none"> Loss of sense of belonging or shared identity in neighborhood. 	<ul style="list-style-type: none"> The Project does not remove housing, historic landmarks, or cultural spaces that typically anchor neighborhood identity. The Property is already occupied by an MPD facility and its continued use as a civic building maintains its long-standing function. The addition of a community-serving multi-purpose space has the potential to enhance community identity and belonging rather than diminish it. The facility's accessibility, equitable design, and inclusive engagement strengthens a sense of shared community. 	<p>Favorable Impact</p> <ul style="list-style-type: none"> The site remains a civic facility and will not remove housing, landmarks, or cultural anchors and maintains a familiar neighborhood function. Community-serving multi-purpose room creates new space for public meetings, programming, and events, which can strengthen identity and belonging. Commitments to accessibility, equitable design, and inclusive engagement support participation by a broader cross-section of residents, reinforcing a shared sense of place.
Housing			
Housing	<ul style="list-style-type: none"> Number of new market rate and dedicated affordable units (per 2019 Housing Equity Report). 	<ul style="list-style-type: none"> Housing would not be created, removed, or restricted as part of the Project. 	<p>Neutral Impact</p> <ul style="list-style-type: none"> Because no housing is created, removed, or restricted, the Project's housing impact is neutral with minimal indirect risk. Any policy debate about using the site for housing is separate from displacement or affordability impacts attributable to this Project.
Housing Burden	<ul style="list-style-type: none"> Households that pay more than 30% of income (burdened), or 50% of income 	<ul style="list-style-type: none"> There would be no direct impact on housing cost burden. 	<p>Neutral Impact</p> <ul style="list-style-type: none"> Because the Project does not alter housing supply or affordability mechanisms, it has no direct impact on

Evaluation of Equitable Development Indicators			
Indicator	Measure	Outcome / Applicable Public Benefit	Favorable Impact/ Minimal Impact/ Neutral Impact /Potentially Unfavorable Impact
	(severely burdened) on housing.		housing cost burden. Any indirect effects are expected to be minimal and manageable with standard monitoring and community benefit measures.
Family-sized Units	<ul style="list-style-type: none"> Dwelling units with 3 or more bedrooms. 	<ul style="list-style-type: none"> The Project would not result in the addition of housing. 	<p>Neutral Impact</p> <ul style="list-style-type: none"> The Project does not add housing, so its impact on housing production is neutral, with a policy opportunity cost rather than a displacement or affordability effect.
Transportation			
Access to Transit	<ul style="list-style-type: none"> 0.5 miles to Metrorail. 0.25 miles to priority bus corridors and other modes of public transportation. 	<ul style="list-style-type: none"> Alabama Avenue is well-served by multiple bus routes: C21, C25, C26, C27, C29, C53, and D10. All bus routes serve stops along nearby portions of Alabama Avenue and offer connections to Metrorail stations: Congress Heights, Southern Avenue, and Naylor Road Metrorail stations. A significant number of new long- and short-term bicycle parking spaces will be provided. Approximately 225 vehicle parking spaces will be provided. 	<p>Favorable Impact</p> <ul style="list-style-type: none"> Given robust bus / Metrorail connectivity, meaningful bicycle provision, and internalized structured parking, the Project's transportation profile is favorable. With standard DDOT-aligned TDM and curb management, residual risks (driveway operations, event peaks, induced demand) are low and controllable, supporting minimal neighborhood traffic and parking impacts.
Transportation Improvements / Pedestrian Safety	<ul style="list-style-type: none"> Gaps in pedestrian network. Lack of pedestrian facilities (crosswalks, lighting, seating, etc.). 	<ul style="list-style-type: none"> Streetscape improvements, including ADA-compliant sidewalks, curb ramps, lighting, and landscaping, will create a safer and more accessible pedestrian network. Tree plantings, landscape buffers, and stormwater features will contribute to walkability, comfort, and environmental quality along Alabama Avenue. Reduction of underutilized lots; ultimately improving connectivity, walkability, and safety. 	<p>Favorable Impact</p> <ul style="list-style-type: none"> The proposed streetscape, ADA upgrades, tree/landscape, and stormwater improvements are strong positives for safety, accessibility, and comfort along the street frontages. With routine maintenance and context-sensitive lighting/planting design, residual risks are low and the net effect on connectivity, walkability, and neighborhood safety is clearly favorable.

Evaluation of Equitable Development Indicators			
Indicator	Measure	Outcome / Applicable Public Benefit	Favorable Impact/ Minimal Impact/ Neutral Impact /Potentially Unfavorable Impact
Employment			
New Jobs	<ul style="list-style-type: none"> Establishment of new businesses Mixed use developments that include offices, restaurants, retail, or other uses. Construction of new development. 	<ul style="list-style-type: none"> The Project will generate short-term construction employment opportunities, with potential for local hiring. A modernized facility can accommodate updated technology, training, and support functions, which may expand staffing capacity over time. The MPD facility has been designed to be able to accommodate workforce development initiatives and training programs. This could create opportunities for Ward 8 residents to access stable, government-related employment. By reinforcing Alabama Avenue, SE as a civic anchor, the facility may indirectly support surrounding businesses through increased daily activity, creating modest spillover employment in retail and services. 	<p>Favorable Impact</p> <ul style="list-style-type: none"> A combination of local hiring, training programs and public-realm activation will result in the delivery of clear, favorable employment outcomes (short-term and ongoing) and modest, positive spillovers to nearby businesses.
Access to Jobs	<ul style="list-style-type: none"> Proximity to public transit. Reduced commute times. Walkability and bikeability. Affordable housing near Employment Centers. Internet Access Access to childcare 	<ul style="list-style-type: none"> The Property is in close proximity to public transit, including Metrorail stations and multiple bus lines, which provides access to and from employment locations. Increase in neighborhood services fills a gap in the street, facilitates walkability, and strengthens connections between residential areas and local businesses. The Property has access to several Internet providers. There are many childcare facilities in the area, including several that are co-located within nearby church premises. 	<p>Favorable Impact</p> <ul style="list-style-type: none"> With strong transit access, added walkability, robust broadband options, and nearby childcare, the context supports economic mobility, daily convenience, and job access. TDM, curb management, affordability partnerships, and program coordination will ensure these inherent advantages translate into widely accessible, on-the-ground benefits that serve employers and employees.

Evaluation of Equitable Development Indicators			
Indicator	Measure	Outcome / Applicable Public Benefit	Favorable Impact/ Minimal Impact/ Neutral Impact /Potentially Unfavorable Impact
Community			
Education / Health / Wellness	<ul style="list-style-type: none"> Access to quality public services. Access to safe, clean public gathering spaces, open spaces, and recreation. Healthy natural environment. 	<ul style="list-style-type: none"> Neighborhood Access to MPD facility, which includes multi-purpose space and other services. Proximity to public schools, including Garfield Elementary School, Johnson Middle School, Ballou High School. Proximity to Francis A. Gregory Neighborhood Library (1.3 miles) St. Elizabeth’s Hospital (2.9 miles) Near Hillcrest Recreation Center (0.8 miles) Near Congress Heights Recreation Center (0.8 miles) Near Oxon Run Park (1.6 miles) Anacostia Riverwalk Trail (2.7 miles) 	Favorable Impact <ul style="list-style-type: none"> Given the cluster of nearby schools, library, health, and recreation assets, and an on-site multi-purpose space, the Project meaningfully strengthens residents’ access to services, learning, and healthy activity. With welcoming design, clear joint-use policies, and coordinated mobility/scheduling, the net community-access impact is strongly favorable.
Environmental	<ul style="list-style-type: none"> LEED rating. Use of renewable energy sources. Storm water management. Placement of unwanted / high-impact land uses 	<ul style="list-style-type: none"> Will meet the LEED Gold certification standard or higher. New facility will include solar panels on the parking garage roof and south façade of parking garage. Improved storm water infrastructure with new landscaping and bioretention basins. Maintenance and installation of street trees with streetscape enhancements. Compliance with applicable Building Code requirements and energy-efficient building systems and technologies. 	Favorable Impact <ul style="list-style-type: none"> With LEED Gold certification, on-site solar, robust stormwater landscaping, and a strengthened tree canopy, the Project delivers material, durable environmental benefits alongside lower operating costs. Resilience impact is strongly favorable.
Access to Amenities	<ul style="list-style-type: none"> Availability of building amenities. Proximity/availability of uses that meet day-to-day needs (grocery, retail, service, eating and drinking). 	<ul style="list-style-type: none"> The proposed Project includes a multi-purpose space accessible to neighborhood residents. The MPD facility will set aside parking spaces in its garage for use by the community and by carshare services. Security camera coverage will be installed to survey the adjacent Metrobus stop. 	Favorable Impact <ul style="list-style-type: none"> With an accessible community room, managed shared parking, secure bike parking, safer bus-stop frontage, and nearby daily amenities, the Project delivers tangible, day-to-day benefits to residents.

Evaluation of Equitable Development Indicators			
Indicator	Measure	Outcome / Applicable Public Benefit	Favorable Impact/ Minimal Impact/ Neutral Impact /Potentially Unfavorable Impact
		· Close to grocery store and amenities at Crest at Skyland Town Center (0.6 miles). b	