

COMPREHENSIVE PLAN EVALUATION

The proposed modification to convert six floors of the approved PUD from office to residential use is not inconsistent with the Comprehensive Plan (“Comp Plan”) and advances the District's racial equity objectives by expanding housing supply, including affordable housing, in a transit-accessible, high-opportunity area. The Application furthers numerous policies across the Citywide Elements and the Near Northwest Area Element, particularly those related to housing production, transit-oriented development, and equitable access to opportunity. Any potential policy tensions are substantially outweighed by the Application's alignment with the Comp Plan's overarching goals and its advancement of equity-forward policies identified in the Comprehensive Plan Equity Crosswalk. A detailed evaluation follows.

I. Evaluation of Comprehensive Plan Policy Guidance.

A. Land Use Element

The Land Use Element is the cornerstone of the Comp Plan. It establishes the basic policies guiding the physical form of Washington, D.C., and provides direction on a range of development, preservation, and land use compatibility issues by outlining the policies through which growth and change will occur in the District.

The Application is not inconsistent with the Land Use Element because it will result in additional housing in a transit-accessible area that will help the District meet long-term neighborhood and citywide demands for housing and affordable housing. The Comp Plan, and particularly the Land Use Element, contains numerous policies that advocate for the cultivation of mixed-income neighborhoods and for increasing the housing supply, and particularly for increasing the affordable housing supply. The Application, through the conversion of the Existing Building's office use to residential use, will advance these goals by facilitating the development of new multifamily housing, including affordable housing, in a high opportunity area near transit. Further, the proposed mix of residential units will advance the District's goals related to enhancing neighborhoods with compatible development, fostering a sense of belonging and increasing inclusivity. Therefore, the Application advances the District's racial equity objectives that are rooted in increasing housing opportunities and access to citywide services for all District residents.

The Application specifically advances the following Land Use Element policies:

LU-1.4 Transit-Oriented and Corridor Development

- LU-1.4.4: Affordable Rental and For-Sale Multi-family Housing Near Metrorail Stations
- LU-1.4.B: Zoning Around Transit
- LU-1.4.C: Metro Station and Inclusionary Zoning

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- 2.3 Residential Land Use Compatibility

- LU-2.3.2: Mitigation of Commercial Development Impacts

B. Transportation Element

The Transportation Element provides policies and actions that are devoted to maintaining and improving the District's transportation system and enhancing the transportation choices available to District residents, visitors, and workers. The overarching goal for transportation in the District is to “[c]reate a safe, sustainable, equitable, efficient, and multimodal transportation system that meets the access and mobility needs of District residents, the regional workforce, and visitors . . . [and to] support local and regional economic prosperity and enhance the quality of life for District residents.” 10-A DCMR § 401.1.

The Application is not inconsistent with the Transportation Element because it will result in the conversion of a portion of the Existing Building from office to residential use in a location that has direct and convenient access to pedestrian, bicycle, and public transportation options. These new housing units will replace an underutilized office use and will provide the opportunity for new residents to live in a diverse, walkable, and well-connected neighborhood. Further, the Application promotes racial equity by enhancing accessibility and mobility options for future residents by ensuring that they reside near essential services and community amenities that can be easily accessed by bicycle, vehicle, and public transportation. Overall, the Application will not only enhance resident mobility, but will also contribute to a more inclusive and accessible urban environment which will ultimately advance racial equity by promoting sustainable and equitable transportation options for all residents.

The Application specifically advances the following Transportation Element policies:

T-1.1 Land Use: Transportation Coordination

- T-1.1.3: Context-Sensitive Transportation
- T-1.1.4: Transit-Oriented Development
- T-1.1.7: Equitable Transportation Access

T-1.2 Transforming Corridors

- T-1.2.1: Major Thoroughfare Improvements
- T-1.2.3: Discouraging Auto-Oriented Uses

T-2.2 Making Multimodal Connections

- T-2.2.2: Connecting District Neighborhoods

T-2.3 Bicycle Access, Facilities, and Safety

- T-2.3.5: Capital Bikeshare Access
- Action T-2.3.B: Bicycle Facilities

T-2.4 Pedestrian Access, Facilities, and Safety

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

T-2.6 Addressing Accessibility for All Residents

- T-2.6.1: Transportation Access

C. Housing Element

The overarching goal of the Housing Element is to provide a safe, decent, accessible, and affordable supply of housing for all current and future residents of the District. 10-A DCMR § 501.1. In the short term, the goal is to produce a total of 36,000 new units by 2025, 12,000 of which are to be dedicated as affordable, in accordance with the Housing Equity Report. According to the Comp Plan, a multi-pronged strategy is needed to facilitate production, address regulatory and administrative constraints, and deliver a substantial number of new units that are affordable to District residents, particularly to moderate and lower income residents. 10-A DCMR § 502.5.

The Application is not inconsistent with the Housing Element because it will help meet the housing needs of present and future District residents at a desirable, transit-accessible location. The Application will significantly increase the number of residential units within the Existing Building, thereby expanding the District's housing and affordable housing supply. The creation of new residential units within the Existing Building is also desirable because the Property is in close proximity to transit opportunities and because the Application will result in the conversion of underutilized office space into much needed residential housing units. The Application is also consistent with the Comprehensive Plan's directive to use tax incentives to support housing production, as the proposed office-to-residential conversion will seek participation in the District's Housing in Downtown tax abatement program, a tool specifically intended to facilitate the creation of new housing units and improve project feasibility. Additional housing also has the potential to diversify the neighborhood, as it would add additional housing types in a high cost, transit accessible area with multiple employment opportunities in close proximity. The additional housing also has the potential to indirectly benefit local residents and families by alleviating some housing pressures in the surrounding neighborhood.

The District's Housing Equity Report, published in October, 2019, established a goal of creating 1,850 new housing units in the Near Northwest Planning area by 2025, of which 1,250 would be new affordable housing units. As set forth in the DMPED 2025 Dashboard, 1,734 of the total housing units have been delivered to date (93.7% of the established goal), but only 418 of the total affordable housing units have been delivered to date (33.4% of the established goal). The proposed conversion of office space in the Existing Building to new housing units, including affordable housing units, will help to bring the Near Northwest Planning Area further into compliance with the Mayor's goals.

The Application specifically advances the following Housing Element policies:

H-1.1 Expanding Housing Supply

- H-1.1.1: Private Sector Support
- H-1.1.2: Production Incentives
- H-1.1.3: Balanced Growth
- H-1.1.4: Mixed Use Development
- H-1.1.5: Housing Quality
- H-1.1.8: Production of Housing in High-Cost Areas
- H-1.1.9: Housing for Families

H-1.2 Ensuring Housing Affordability

- H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority
- H-1.2.2: Production Targets
- H-1.2.3: Affordable and Mixed-Income Housing
- H-1.2.5: Moderate-Income Housing
- H-1.2.9: Advancing Diversity and Equity of Planning Areas
- H-1.2.11: Inclusive Mixed-Income Neighborhoods

D. Environmental Protection Element

The Environmental Protection Element addresses the protection, conservation, and management of the District's land, air, water, energy, and biological resources. The overarching goal of the Environmental Protection Element is to protect, restore, and enhance the natural and human-made environment in Washington, D.C. by taking steps to improve environmental quality and resilience, adapt to and mitigate climate change, prevent and reduce pollution, improve human health, increase access to clean and renewable energy, conserve the value and functions of the District's natural resources and ecosystem, and educate the public on ways to secure a sustainable future. 10-A DCMR § 601.1.

The Application is not inconsistent with the Environmental Protection Element because it will convert a portion of the Existing Building to residential use, thus reducing construction materials and waste. The project will incorporate optimized energy performance systems, indoor water reduction systems, and indoor air quality strategies. The project will also incorporate innovative design techniques that utilize low emitting materials. Moreover, given the Property's proximity to numerous public transportation options including metro, bus, bike lanes, and pedestrian infrastructure the Application also inherently promotes sustainable transportation options, therefore reducing the reliance on cars and ultimately contributing to the District's overall sustainability goals.

Moreover, the proposed conversion of the Existing Building will comply with all applicable environmental laws and regulations and will be constructed consistent with the Sustainable D.C. Plan. These improvements will positively impact all District residents, particularly those residents residing in or near the Property.

The Application advances the following Environmental Protection Element policies:

- E-3.2.7: Energy-Efficient Building and Site Planning
- E-3.1.1: Promoting Water Conservation
- E-5.1.5: Improving Air Quality Through Transportation Efficiency

E. Economic Development Element

The Economic Development Element addresses the future of Washington, D.C.'s economy and the creation of economic opportunity for current and future District residents. The overarching goal for economic development in the District is to drive inclusive economic expansion and resilience by growing the economy and by reducing employment disparities across race, geography, and educational attainment status. 10-A DCMR § 701.1.

The Application is not inconsistent with the Economic Development Element because it will create new housing for residents who will support the retail uses both within the Existing Building and in the surrounding neighborhood. The additional housing opportunities created by the Application will enable future residents to live near economic opportunities and jobs, thereby reducing employment disparities. Conversion of the underutilized office space within the Existing Building will also help to create a vibrant mixed-use building and overall neighborhood located in the West End/Foggy Bottom area of the District. Doing so will help stimulate economic growth and activity in this and surrounding areas. Such activity and residential inclusivity will support the broader community and will foster community resilience and empowerment, ultimately advancing racial equity in the West End/Foggy Bottom neighborhood and throughout the surrounding area.

The Application advances the following Economic Development Element policies:

ED-1.1 Diversifying the Economic Base

- ED-1.1.1: Core Industries
- ED-1.16: Competitive Edge

ED-2.2 The Retail Economy

- ED-2.2.1: Expanding the Retail Sector
- ED-2.2.2: Downtown Shopping
- ED-2.2.3: Neighborhood Shopping
- ED-2.2.5: Business Mix
- ED-2.2.9: Clustered Retail at Transit

ED- 3.1 Strengthening Retail Districts

- ED-3.1.1: Neighborhood Commercial Vitality
- ED-3.1.8: Neighborhood Retail District Identity and Promotion

F. Historic Preservation Element

The Historic Preservation Element guides the protection, enhancement, and continued use of Washington, D.C.'s historic resources, while recognizing historic preservation as a critical planning tool that supports sustainability, community vitality, and economic resilience. The Element emphasizes the adaptive reuse of historic buildings to accommodate contemporary needs, promote continued investment, and ensure that historic properties remain active and productive components of the District's urban fabric. In this context, the Application is consistent with the Historic Preservation Element's goals by reinvesting in an existing structure, extending its useful life, and adapting it for residential use in a manner that supports long-term stewardship of a significant building within the West End/Foggy Bottom area.

The Application advances the following Historic Preservation Element policies:

HP-1.6 The Image of Washington, DC

- HP-1.6.1: Washington, DC's Historic Image
- HP-1.6.2: Preserving the District's Historic Character
- HP-1.6.4: Downtown and Neighborhood Character

HP-2.4 Zoning Compatibility

- HP-2.4.1: Preservations Standards for Zoning Review

HP-2.5 Review and Rehabilitation and New Construction

- HP-2.5.2: Adaptation of Historic Properties for Current Use
- HP-2.5.3: Compatible Development
- HP-2.5.4: Suitability to the Historic Context
- HP-2.5.5: Protecting Historic Building Integrity

HP-4.1 Preservation and Economic Development

- HP-4.1.1: Preservation and Community Development
- HP-4.1.2: Preservation and Neighborhood Identity
- HP-4.1.4: Historic preservation and Housing
- HP-4.1.5: Affordable Housing in Older and Historic Buildings

G. Near Northwest Area Element

The Property is located in the Near Northwest Planning Area and is within the planning area's Foggy Bottom/West End policy focus area. The Near Northwest Planning Area encompasses the 3.6 square miles located directly north and west of Central Washington. 10-A DCMR § 2100.1. Near Northwest is known for its historic architecture, well-established

neighborhoods, lively shopping areas, and nationally recognized institutions. 10-A DCMR § 2100.2. According to the Comp Plan, the most significant challenge facing the Near Northwest Planning Area is retaining the physical and social fabric of the community in the face of intense economic pressure. As such, the Near Northwest Area Element's policies are focused on the preservation and production of affordable housing, strengthening the opportunities for small and local businesses, and addressing the tensions that inevitably result from the area's highly diverse mix of land uses and densities. 10-A DCMR § 2100.9.

The Application is not inconsistent with the Near Northwest Area Element because it will permit the conversion of underutilized office space into new residential units that include a diverse range of housing options which are of critical need to the Near Northwest Planning Area. The Application will also generate affordable housing in the Near Northwest Planning Area, which is particularly desirable because the newly created affordable housing will not displace existing residents and because the preservation and production of affordable housing is an important policy objective of the Near Northwest Area Element. Additionally, as encouraged by the Near Northwest Area Element, proposed residential units will help support retail options both within the Existing Building and in the surrounding neighborhood.

The Application advances the following Near Northwest Area Element policies:

NNW-1.1 Guiding Growth and Neighborhood Conservation

- NNW-1.1.1: Residential Neighborhoods
- NNW-1.1.3: Neighborhood Commercial Vibrancy
- NNW-1.1.8: Affordable Housing

As detailed above, the proposed conversion of a portion of the Existing Building furthers numerous policies across various elements of the Comp Plan. In conducting its analysis, the Applicant endeavored to find potential inconsistencies within and across the District Elements of the Comp Plan. However, the Applicant did not find any substantial or significant inconsistencies that would undermine the Application's consistency with the Comp Plan as a whole. Should the District of Columbia Office of Planning ("OP") or the Zoning Commission identify any potential inconsistencies, the Applicant will address the policy at issue in a responsive filing.

II. Evaluation of Zoning Action through a Racial Equity Lens

The proposed office-to-residential conversion advances the District's racial equity objectives by addressing systemic barriers to housing access and expanding opportunities in a high-resource area. This analysis is grounded in the Comprehensive Plan's Framework Element, which defines equity as ensuring that "all people share equal rights, access, choice, opportunities and outcomes, regardless of characteristics such as race, class, or gender," achieved through "targeted actions and investments to improve outcomes for those who face the worst health, social and economic challenges." (10-A DCMR § 213.6). The Office of Planning's Equity Crosswalk serves as a tool to identify which policies hold promise to deliver on the goals of equity established in the Framework Element and to make a tangible difference in the lives of DC residents who have yet to reap the benefits of growth and change in the city. The Application furthers OP identified equity-forward policies related to housing production and affordability (H-1.2.2, H-1.2.3, H-

1.2.9), equitable transportation access (T-1.1.7, T-1.1.A), neighborhood revitalization (LU-2.1.2), and affordable housing preservation and production (NNW-1.1.8)

As detailed above, the proposed conversion of a portion of the Existing Building furthers numerous policies across various elements of the Comp Plan. In conducting its analysis, the Applicant endeavored to find potential inconsistencies within and across the District Elements of the Comp Plan. However, the Applicant did not find any substantial or significant inconsistencies that would undermine the Application’s consistency with the Comp Plan as a whole. Should the District of Columbia Office of Planning (“OP”) or the Zoning Commission identify any potential inconsistencies, the Applicant will address the policy at issue in a responsive filing.

Upon consideration of the themes discussed in the table below, any impacts/outcomes resulting from the proposed PUD modification are largely anticipated to be neutral as they relate to racial equity, with the potential for modest positive outcomes in housing and access to economic opportunity.

<p>Direct Displacement</p>	<p>The proposed conversion of a portion of the Existing Building will not result in the direct displacement of residents because office use currently occupies the portion of the Existing Building to be converted, not residential use</p>
<p>Indirect Displacement (Economic and Cultural)</p>	<p>The proposed conversion of the Existing Building will not lead to indirect displacement on the Property or within the immediately surrounding area. Indirect displacement generally occurs when new uses significantly alter neighborhood dynamics or raise property values and rents, making it unaffordable for long-standing residents or businesses to remain in place. In this case, the conversion of the Existing Building from office use to residential use will add housing supply to the area, which helps address rather than exacerbate displacement pressures. The Existing Building is already well integrated within the surrounding community, and the adaptive reuse of this existing structure represents a modest intensification of use rather than a dramatic transformation of neighborhood character. The proposed conversion will therefore have a minimal impact on the surrounding community.</p>
<p>Housing</p>	<p>The proposed conversion of a portion of the Existing Building will have a positive impact on housing because it will result in the creation</p>

	<p>of more residential units. Additionally, the proposed conversion would allow for the creation of a mix of unit types and sizes, and the newly created residential units would include market rate and affordable housing units that will be offered in accordance with all Inclusionary Zoning requirements.</p>
<p>Physical</p>	<p>The proposed conversion of a portion of the Existing Building will reduce the need for new construction materials, will incorporate optimized energy performance systems, indoor water reduction systems, and indoor air quality strategies. The project will involve innovative design techniques and will utilize low emitting materials. The project also promotes sustainable transportation. The project will comply with all applicable environmental laws and regulations, and will help to advance many goals of the Sustainable DC Plan</p>
<p>Access to Opportunity</p>	<p>The proposed conversion of a portion of the Existing Building will create new access to employment opportunities by creating new residential units that are in close proximity to transit centers and jobs and are well connected to nearby social and economic opportunities.</p>
<p>Community</p>	<p>The Property is located within the boundaries of Advisory Neighborhood Commission (“ANC”) 2A. Prior to filing this application the Applicant engaged with ANC commissioners, including the ANC Single Member District commissioner for the Property. On February xx, 2026, the Applicant presented the Application at a public community meeting hosted by the ANC. No issues or concerns were raised. The Applicant is also serving a copy of this Application on ANC 2A at the same time that it is filing it with the Office of Zoning.</p>

III. Conclusion

The proposed conversion of a portion of the Existing Building from office to residential use advances key Comp Plan policies and furthers racial equity within the District by creating

additional housing and affordable housing in a mixed-use, transit-accessible area. The project will provide additional housing opportunities that will indirectly benefit local residents and families by alleviating housing pressures in the surrounding neighborhood, and by generating affordable housing in the Near Northwest Planning Area.