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District of Columbia Zoning Commission
441 4th Street, NW, Suite 200S
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**Re: Z.C. Case No. 23-16 UDC's 2023-2033 Lamond-Riggs Campus Master Plan
Applicant's Supplemental Submission**

Dear Members of the Commission:

On behalf of the University of the District of Columbia ("UDC" or the "Applicant"), enclosed please find revisions and updates to the Applicant's 2023-2033 Lamond-Riggs Campus Master Plan. This revision incorporates general updates, community outreach, and responses to comments received from the District Department of Transportation by email correspondence dated May 24th, 2023 and June 21st, 2023. In addition this update also includes a comprehensive racial equity analysis of the Campus Plan. We note that, as part of this revision, the following items have either been revised or are addendums to the Campus Plan filing and are being submitted herewith.

The Applicant attended ANC 5A's September 27th meeting to answer any questions, and ANC 5A intends on voting on the resolution at their following monthly meeting.

I. Community Feedback and Revised Architectural Exhibits

Ahead of the Zoning Commission hearing, the Applicant has received feedback on the 2023-2033 Lamond-Riggs Campus Master Plan from community members, including members of ANC 5A, who will be impacted by the zoning action. This feedback comprises suggested considerations to be included in the Campus Plan. After research and consideration, the Applicant notes the following items, as identified by community members, for inclusion in the Campus Plan:

- Identify access from Galloway Street for pick-up and drop-off activity in the Campus Plan
 - Architectural exhibits revised, as noted below
- As outlined Subtitle C § 801.1 of the Zoning Regulations, post signage for bicycle parking spaces
 - Architectural exhibits revised, as noted below
- Utilize native plantings in new landscaping
 - Upon finalization of a construction bid and coordination with landscape architects, native plantings would be utilized
- Develop an internship program for high school students
 - UDC provides enrollment opportunities for high school students through dual enrollment
 - UDC participates in the Mayor Mario Barry Summer Youth Employment Program

The Applicant is enclosing revised architectural exhibits ("Revised Exhibits"), which are attached at **Tab A**. The Revised Exhibits reflect refinements to the proposed development, as referenced above and the design of the on-site parking area adjacent to Hamilton Street NE as well as landscaping elements within the South Dakota Avenue NE public right-of-way. These diagrams have been revised both in response to comments provided by community members and the District Department of Transportation ("DDOT").

1. Pedestrian Improvements – To prioritize safe pedestrian access from Hamilton Street NE, the Applicant has added a pedestrian walkway and striped crossing from Hamilton Street NE across the Hamilton Street NE parking lot to the northern frontage of the building.
2. Public Realm Design Compliance – To confirm compliance with public realm design standards issued by DDOT’s Urban Forestry Division, the Applicant identifies the existing street trees and associated tree boxes along the eastern frontage of South Dakota Avenue NE, which fronts the Applicant’s property.

The diagrams that have been revised, labeled as “Exhibits” within the 2023-2033 Lamond-Riggs Campus Master Plan filing, are as follows:

Exhibit Number listed in CMP Filing	Diagram Title	Associated Exhibit Number at Case No. 23-16
4.2c	Proposed Campus Development Plan – Modernization (Phase 1)	2H2
4.2e	Proposed Campus Development Plan – Courtyard (Phase 2)	2H2
6.3b	Proposed Landscape Improvement Diagram (Phase 2)	2H4
6.5	Future Bicycle Facilities (Phase 2)	2H4

II. Comprehensive Plan

The Comprehensive Plan (“Comp Plan”) establishes that, “the zoning of any given area should be guided by the Future Land Use Map, interpreted in conjunction with the text of the Comprehensive Plan, including the citywide elements and the area elements, as well as approved Small Area Plans.” (10A DCMR § 227.1.) Therefore, to find the Application not inconsistent with the Comprehensive Plan, the Citywide Elements, Area Elements, FLUM and GPM should be reviewed in the aggregate. (10A DCMR § 108.) Under the recently enacted amendments to the Comprehensive Plan, the Commission is now required to “evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis.” (10A DCMR § 2501.7.) The Comprehensive Plan defines “racial equity” as “the moment when ‘race can no longer be used to predict life outcomes and outcomes for all groups are improved.’” (10A DCMR § 213.8.) Accordingly, the Comprehensive Plan calls for “[a]ddressing issues of equity in transportation, housing, employment, income, asset building, geographical change, and socioeconomic outcomes through a racial equity lens.” (10A DCMR § 213.10.6.)

This Application is not inconsistent with the Comprehensive Plan, including the Land Use Element, Transportation Element, Environmental Protection Element, Economic Development Element, Urban Design Element, and other pertinent policies, as viewed through a racial equity lens. The Application advances policies outlined in the Comprehensive Plan’s Educational Facilities Element as described in the 2023-2033 Lamond-Riggs Campus Master Plan document.

1. The Land Use Element

The Comprehensive Plan’s Land Use Element “integrates the policies and objectives of all the other District Elements,” and, as such, “should be given greater weight than the other elements as competing policies in

different elements are balances.” (10A DCMR § 300.3.) The Application is not inconsistent with the following policies in the Land Use Element:

Policy LU-1.4.9: Public Facilities

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

Policy LU-2.2.4: Neighborhood Beautification

Encourage projects that improve the visual quality of neighborhoods, including landscaping and tree planting, facade improvement, anti-litter campaigns, graffiti removal, murals, improvement or removal of abandoned buildings, street and sidewalk repair, park improvements, and public realm enhancements and activations. 311.5

Policy LU-2.3.5: Institutional Uses

Recognize the importance of institutional uses, such as private schools, childcare facilities, hospitals, churches, and similar uses, to the economy, character, history, livability, and future of Washington, DC and its residents. Ensure that when such uses are permitted in residential neighborhoods, their design and operation is sensitive to neighborhood issues and neighbors’ quality of life. Encourage institutions and neighborhoods to work proactively to address issues, such as transportation and parking, hours of operation, outside use of facilities, and facility expansion. 312.7

Policy LU-3.3.1: Transportation Impacts of Institutional Uses

Support ongoing efforts by institutions to mitigate their traffic and parking impacts by promoting ridesharing, carpooling, public transportation, shuttle service and bicycling; providing on-site parking; and undertaking other transportation demand management measures. 317.7

Policy LU-3.3.2: Corporate Citizenship

Support continued corporate citizenship among large institutions, including colleges, universities, hospitals, private schools, and nonprofits. Given the large land area occupied by these uses and their prominence in the community, institutions (along with the District itself) should be encouraged to be role models for smaller employers in efforts to improve the physical environment. This should include a continued commitment to high-quality architecture and design on local campuses, expanded use of green building methods and low-impact development, and adaptive reuse and preservation of historic buildings. 317.8

The Application will further the policies of the Land Use Element by encouraging the revitalization and modernization of a site containing aging infrastructure and outdated facilities.

2. The 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.” (10A DCMR § 400.1.) Accordingly, “[t]he overarching goal for transportation in the District is: Create a safe, sustainable, equitable, efficient, and multimodal transportation system that meets the access and mobility needs of District residents, the regional workforce, and visitors; supports local and regional economic prosperity; and enhances the quality of life for District residents.” (10A DCMR § 401.1.) The Application furthers the following policy in the Transportation Element:

Policy T-1.1.8: Minimize Off-Street Parking

An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive off-street vehicle parking should be discouraged. 403.14

Policy T-2.4.1: Pedestrian Network

Develop, maintain, and improve pedestrian facilities. Improve the District's sidewalk system to form a safe and accessible network that links residents across Washington, DC. 411.5

Policy T-2.4.2: Pedestrian Safety

Improve safety and security at key pedestrian nodes throughout the District. Use a variety of techniques to improve pedestrian safety, including textured or clearly marked and raised pedestrian crossings, pedestrian-actuated signal push buttons, high-intensity activated crosswalk pedestrian signals, rectangular rapid flashing beacons, accessible pedestrian signal hardware, leading pedestrian interval timing, and pedestrian countdown signals. 411.6

Policy T-2.4.3: Traffic Calming

Continue to address traffic-related safety issues through carefully considered traffic-calming measures. Expedite processes for implementing traffic calming measures at locations and corridors identified as having the highest number of incidents involving bicyclists and pedestrians. 411.7

Policy T-3.1.1: TDM Programs

Provide, support, and promote programs and strategies aimed at reducing the number of car trips and miles driven (for work and non-work purposes), to increase the efficiency of the transportation system. 415.10

Policy T-3.3.7: Truck Routing and Parking

Enhance truck route enforcement to encourage the use of appropriate routes, which will minimize travel on local roads. Delivery vehicles should park in suitable locations for loading and unloading and should not block travel lanes, transit stops, crosswalks, or bike lanes. 417.18

The Project will encourage transit use by minimizing off-street parking availability. Public realm improvements, including more bicycle parking facilities and improved pedestrian facilities in and around the Campus, will encourage pedestrian and bicycle transportation.

3. The Environmental Protection Element

Policy E-1.1.2: Urban Heat Island Mitigation

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

Policy E-1.1.4: Non-Structural Land Uses

Incorporate non-structural uses within designated special flood hazard areas to help protect and enhance the natural and beneficial functions of floodplains, wetlands, and other undeveloped landscape features. These uses include but are not limited to parks, recreation areas, and permanently protected open spaces. 603.8

Policy E-1.1.5: Resilient Infrastructure

Design infrastructure, such as roads and parks, to withstand future climate impacts, and increase Washington, DC's resilience by having roads and parks serve multiple purposes where possible, including flood risk reduction, urban heat island mitigation, and stormwater management. 603.9

Policy E-2.1.3: Sustainable Landscaping Practices

Encourage the use of sustainable landscaping practices to beautify the District, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity. District government, private developers, and community institutions should coordinate to significantly increase the use of these practices, including planting and maintaining mostly native trees and other plants on District-owned land outside the right-of-ways in schools, parks, and housing authority lands. 605.7

Policy E-3.2.7: Energy-Efficient Building and Site Planning

Include provisions for energy efficiency and for the use of alternative energy sources in the District's planning, zoning, and building standards. Encourage new development to exceed minimum code requirements and contribute to energy efficiency and clean energy goals. 612.9

Policy E-4.1.1: Maximizing Permeable Surfaces

Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce runoff. 615.3

Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff

Promote an increase in tree planting and vegetated spaces to reduce stormwater runoff and mitigate the urban heat island, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces. 615.4

Policy E-4.1.3: GI and Engineering

Promote GI and engineering practices for rainwater reclamation and wastewater reuse systems. GI practices include green roofs, bioretention facilities, permeable pavement, and rainwater harvesting. Green engineering practices include emerging wastewater treatment technologies, constructed wetlands, and purple pipe systems or other design techniques, operational methods, and technology to reduce environmental damage and the toxicity of waste generated. 615.5

Policy E-4.3.1: Promotion of Community Gardens, Urban Farms, and Educational Growing Spaces

Continue to encourage and support the development of community gardens, urban farms, rooftop farms, and educational growing spaces on public and private land across Washington, DC, with the Sustainable DC 2.0 plan, by identifying public and private land suitable for urban agriculture and streamlining the permitting process for gardeners and farmers. 617.3

Policy E-4.3.3: Domestic Gardening and Urban Farming

Provide technical and educational support to District residents who wish to plant backyard and rooftop gardens or start urban farming businesses. This could include measures such as partnerships with local gardening groups; education through conferences, websites, and publications; tool lending programs; integrated pest management; and information on composting and best practices in gardening. 617.5

Policy E-4.3.6: Produce and Farmers Markets

Support the creation, maintenance of, and outreach for farmers markets in all quadrants of the District to provide outlets for urban farms and community gardens to sell healthy, locally grown produce to District residents. 617.8

Policy E-6.7.1: Addressing Environmental Injustice

Continue to develop and refine solutions to avoid or mitigate the adverse effects of industrial, transportation, municipal, construction and other high impact uses, particularly when proximate to residential areas, and specifically identify and address impacts to vulnerable populations. These solutions include enhanced buffering; sound walls; operational improvements; truck routing; regular air, soil, and water quality assessments; and regulating specific uses that result in land use conflicts. 628.4

Policy E-7.2.2: Continuing Education on the Environment

Encourage greater participation by residents, business owners, institutions, and public agencies in reaching environmental goals. This should be achieved through public education, community engagement, compliance assistance, and environmental enforcement programs. 631.3

Policy E-7.3.2: Job Training

Continue to train more District residents to be competitive for livable-wage jobs in growing industries such as sustainability, the environment, and resilience. Connect underemployed residents to training programs and any necessary social services. 632.4

The Project aims to advance the policies outlined in the Comprehensive Plan's Environmental Protection Element through the use of sustainable design at the Lamond-Riggs Campus, including provisions for solar-readiness, a green roof proposed on the new Wing D, and improved permeability for bioretention areas and stormwater management facilities. In connection with UDC's Urban Food Hub programming, the Project will support policies related to urban farming and community gardening.

4. The Economic Development Element

Policy ED-2.4.1: Institutional Growth

Support growth in the higher education and health care sectors. Recognize the potential of these institutions to provide employment and income opportunities for District residents, and to enhance the District's array of cultural amenities and health care options. 710.4

Policy ED-2.4.4: Public Higher Education for District Residents

Support UDC in its role as the District's public institution of higher learning. Recognize that the community college and university expand employment and income opportunities for District residents. In addition, elevate the university as an important resource for building a workforce for growth industries that require highly trained employees. 710.7

Policy ED-4.1.3: Certification and Associate Programs

Support the continued contributions of colleges and universities in providing career-building opportunities for District residents, including literacy and job training programs, as well as professional certificate and two-year degree programs. The District will strongly support the UDC as a public institution of higher learning, a place of continuing education, and a ladder to career advancement for District residents. 716.9

Policy ED-4.1.4: Adult Education

Support adult education and workforce development, career, and technical training for unskilled adult workers of all ages. Continue to innovate with programs that blend adult education and basic skills remediation with occupational skills and work experience. 716.10

Policy ED-4.2.1: Linking Residents to Jobs

Promote measures that increase the number of District jobs held by District residents. According to the Census Bureau's Longitudinal Employer-Household Dynamics Program, 67 percent of the jobs in the District were held by nonresidents in 2016. While recognizing that some imbalance is inevitable due to the relatively large number of jobs and small number of residents in Washington, DC, the District should work to increase the percentage of resident workers through its job training and placement programs. 717.9

Policy ED-4.2.2: Linking Job Training to Growth Occupations

Target job training, placement, and career programs toward core and growth sectors and occupations, such as hospitality, information technology, health care, construction, home health aides, and computer user support specialists. Seek opportunities to link the pipeline of potential employees from workforce development programs to small, locally owned businesses. 717.10

Policy ED-4.2.3: Focus on Economically Disadvantaged Populations

Focus workforce development efforts on economically disadvantaged communities, including communities of color, and particularly those with many unemployed or marginally employed residents. Assistance should also be focused on groups most in need, including persons with limited work skills, the LGBTQ+ community, persons with disabilities, single mothers, youth leaving foster care, returning citizens, and persons with limited English proficiency. 717.1

The Campus Plan supports the Economic Development policies outlined above. The University continues to commit to exploring the expansion of programming opportunities, such as workforce development and job training programs, offering paths to employment and income opportunities for District residents. As previously noted, the UDC provides enrollment opportunities for high school students through dual enrollment and by participating in the Mayor Mario Barry Summer Youth Employment Program, illustrating a commitment to advancing several of the policies identified above.

5. The Parks, Recreation, and Open Space Element

Policy PROS-1.2.2: Improving Accessibility

Improve accessibility to and within the major park and open space areas through pedestrian safety and street crossing improvements, wayfinding signage, bike lanes and storage areas, perimeter multiuse trails within select parks, and adjustments to bus routes where appropriate. All parks should be accessible by foot, and most should be accessible by bicycle. Seek to provide access within parks for all ages and abilities consistent with park use and recognize that paved trails are accessible to wheelchair users, whereas dirt, cinder, and wood chip trails can present challenges for these users. 805.8

Policy PROS-3.1.6: Fort Circle Parks

Protect and enhance the Fort Circle Parks as an integrated network of permanent open spaces that connect neighborhoods, provide scenic beauty and historic interest, and offer a variety of recreational activities. Recognize these parks as an important District and national resource. Prevent District and federal actions that would harm historic and ecological resources in the Fort Circle Parks, and strongly support actions that would improve their maintenance, connectivity, visibility, accessibility, and safety. 812.15

The Campus Plan considers the proximity of Fort Circle Parks to UDC's Lamond-Riggs Campus, and it explores opportunities for greater connectivity between the Property and the park.

6. The Urban Design Element

Policy UD-1.4.1: Thoroughfares and Urban Form

Use Washington, DC's major thoroughfares to reinforce the form and identity of the District, connect its neighborhoods, and improve its aesthetic and visual character through context-sensitive landscaping, tree planting, and streetscape design. Special attention should be placed on how public space, building restriction areas, and adjacent buildings contribute to each thoroughfare's character. Focus improvement efforts on thoroughfares with limited amenities. 906.3

Policy UD-2.2.7: Preservation of Neighborhood Open Space

Ensure that infill development respects and improves the integrity of neighborhood open spaces and public areas. Buildings should be designed to minimize the loss of sunlight and maximize the usability of neighborhood parks and plazas. Buildings adjacent to parks or natural areas should orient their entrances or other community-serving functions toward these shared resources. 909.13

Policy UD-3.2.5: Safe and Active Public Spaces and Streets

The design of the built environment should encourage public activity throughout the day and help minimize the potential for criminal activity. Design measures include active building frontages (such as windows, balconies, and frequently spaced entrances) adequate lighting that avoids glare and shadow, maintaining clear lines of sight and visual access, and avoiding dead-end streets. Where feasible consider closing streets to vehicular traffic to enhance pedestrian and cycling uses of streets. 914.7

Policy UD-4.2.2: Engaging Ground Floors

Promote a high standard of storefront design and architectural detail in mixed-use buildings to enhance the pedestrian experience of the street. Promote a high degree of visual interest through syncopated storefronts that vary every 20 to 30 feet, provide direct lines of sight to interior social spaces, provide socially oriented uses along the public street, and use tactile, durable materials at the ground level. 918.4

Policy UD-4.2.4: Creating Engaging Facades

Design new buildings to respond to the surrounding neighborhood fabric by modulating façade rhythms and using complementary materials, textures, and color, as well as well-designed lighting. Varying design tactics may be used to engage a building with its surroundings. In contexts with smaller lot sizes and multiple closely spaced building entrances, breaking up a building façade in the vertical direction is encouraged, along with strongly defined and differentiated bases, centers, and tops of buildings. In areas lacking a strong building-form pattern, the use of complementary or reinterpreted materials and colors could strengthen architectural identity. 918.6

Through thoughtful softscape and hardscape improvement efforts, the Campus Plan seeks to contribute to the District's urban design character. The new Wing D will provide an entrance oriented towards the adjacent Fort Circle Park and it will use architectural features to provide vistas to the park from the Campus building. Landscaping improvements would be context-sensitive through the planting of native species.

7. The Community Services and Facilities Element

Policy CSF-1.1.11: Developing a Food Systems Network

Support development of a system of food hub and processing centers where nutritious and local food can be aggregated, safely prepared, and efficiently distributed to District agencies, feeding sites, shelters for persons experiencing homelessness, schools, nonprofits, and local businesses for the District's normal institutional meal operations as well as leveraged for emergency feeding efforts during disaster events. 1103.22

The Campus Plan identifies the existing Urban Food Hub program operated by the University's College of Agriculture, Urban Sustainability, and Environmental Sciences (CAUSES).

8. The Arts and Culture Element

Policy AC-1.2.3: Expand Community-Oriented Cultural Programming

Continue expanding community-oriented cultural programming through grants and programming partnerships. 1404.8

Policy AC-1.2.7: Mitigate Cultural Displacement

Reinforce and elevate existing cultural anchors, practices, and traditions in communities undergoing significant demographic change. Such efforts should reflect the history and culture of established communities in these neighborhoods and also encourage new residents to respect and participate in this history and culture. In addition, support cross-cultural programming that fosters a shared understanding of Washington, DC's history and culture among all residents. 1404.1

Policy AC-2.1.1: Emphasizing Public Spaces with Art

Use public art to strengthen and reflect the District's diversity, including its identity as a local cultural and arts center. Public art should accent locations such as Metro stations, sidewalks, streets, parks, and building lobbies. It should be used in coordination with landscaping, lighting, paving, and signage to create gateways for neighborhoods and communities. 1406.5

Policy AC-2.2.3: Using Art to Convey Identity

Use art as a way to help neighborhoods express unique and diverse identities, promoting each community's individual character and sense of place. 1407.4

Policy AC-2.2.8: Murals as Platforms for Community Building

Recognize murals as platforms for expressions of community heritage and aspiration that provide inspiration for community dialogues. 1407.9

The Campus Plan proposes the inclusion of a mural along the façade of Wing A fronting along South Dakota Avenue NE, highlighting the University's identity as an Historically Black College and University ("HBCU"). Further, the Campus Plan identifies the placement of the existing 9/11 Memorial, dedicated to students at the former Bertie Backus Middle School lost in the attacks, along the South Dakota Avenue NE frontage.

9. The Upper Northeast Area Element

Policy UNE-1.1.1: Neighborhood Conservation

Encourage growth while enhancing the neighborhoods of Upper Northeast, such as Michigan Park, North Michigan Park, University Heights, Woodridge, Brookland, Queens Chapel, South Central, Lamond-Riggs, and Arboretum. The residential character of these areas should be preserved while

allowing new housing opportunities for all incomes. Places of historic significance, gateways, parks, and important cultural and social places should likewise be preserved and enhanced. 2408.2

Policy UNE-1.1.3: Metro Station Development

Capitalize on the presence of the Metro stations at Rhode Island Avenue, Brookland-CUA, and Fort Totten, to provide new transit-oriented housing, community services, and jobs. New development around each of these three stations is strongly supported. Locating higher-density housing near Metro stations minimizes the impact of cars and traffic that would be expected if the residents lived farther from high-capacity transit. The District will coordinate with WMATA to make the design, density, and type of housing or other proposed development at these stations is compatible with surrounding neighborhoods; respects community concerns and feedback; and serves a variety of household incomes. Development shall comply with other provisions of the Comprehensive Plan regarding the compatibility of new land uses with established development, such as existing production, distribution, and repair (PDR) uses. Development shall also comply with other Comprehensive Plan guidance regarding the provision of appropriate open space, management of mobility, and public services. 2408.4

Policy UNE-1.2.1: Streetscape Improvements

Improve the visual quality of streets in Upper Northeast, especially along North Capitol Street, Rhode Island Avenue, Bladensburg Road, New York Avenue, Eastern Avenue, Michigan Avenue, Maryland Avenue, Florida Avenue, West Virginia Avenue, and Benning Road. Landscaping, street tree planting, street lighting, and other improvements should make these streets more attractive community gateways. 2409.1

While no development is proposed adjacent to the Fort Totten Station as part of this Application, the Campus Plan seeks to encourage the use of public transit due to the proximity of the station to the Campus (0.4 miles). Streetscape improvements explored as part of the Application would include pedestrian bumpouts and increased connectivity from the campus building to the public right-of-way.

III. Racial Equity Analysis

The following supplemental information serves as the racial equity analysis, which details how racial equity is furthered by the Campus Master Plan. As a designated HBCU, and as the only urban land-grant public institution of higher education in the nation, UDC is dedicated to advancing equitable opportunities for marginalized communities, in particular for communities of color. “UDC’s primary purpose is to ‘democratize’ education by extending it to citizens who are not able to afford it, or otherwise gain access to it,” notes the University’s strategic plan for revitalization, *The Equity Imperative*.¹ Through sound investment in both programming efforts and, as detailed in the Campus Plan, the University’s built environment, UDC seeks to fulfill its purpose towards equitable access.

1. Racial Equity & the Comprehensive Plan

Racial equity is a primary focus of the Comprehensive Plan, especially as it relates to zoning and development where District-wide priorities such as avoiding displacement of existing residents and creating and increasing access to opportunities are a major focus. The Framework Element states that equity is both an “outcome and a process,” and exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. (10A DCMR § 213.6.)

¹ *The Equity Imperative: A Strategic Plan to Regenerate the University of the District of Columbia as a Public Higher Education Model of Urban Student Success 2019-2022*, The University of the District of Columbia, 2019.

The Comp Plan places an emphasis on considerations of racial equity which must be part of a District agency's evaluation and implementation of Comp Plan policies. Thus, the Implementation Elements calls for agencies to develop and implement tools to be used in evaluating and implementing the Comp Plan through a "racial equity lens." The Zoning Commission considers racial equity "as an integral part of its analysis as to whether a proposed zoning action is "not inconsistent" with the Comp Plan." (10A DCMR § 2501.8.)

The racial equity analysis provided herein was guided by the Zoning Commission's Racial Equity Analysis Tool ("REA Tool"), the D.C. Office of Planning's ("OP") Equity Crosswalk (effective August 21, 2021) (the "Equity Crosswalk"), which highlights the Comp Plan policies and actions that explicitly address racial equity, and the Upper Northeast ("UNE") Planning Area element.

2. Evaluation of Comprehensive Plan Consistency

Per Part I of the REA Tool (Racial Equity Analysis Submissions – Guidance regarding the Comprehensive Plan), the Applicant has conducted an evaluation of the proposed Campus Plan's consistency with the Comp Plan, including the policies of all applicable Citywide and Area Elements, the Future Land Use Map ("FLUM"), Generalized Policy Map ("GPM"), and any other applicable adopted public policies and active programs. Additional analysis of the applicable policies of the District Elements of the Comp Plan can be found at **Exhibit 2G** of the record.

When viewed through a racial equity lens, the Applicant finds the proposal to be not inconsistent with the Comp Plan. Adopted by the D.C. Council as part of the 2021 amendments to the Comprehensive Plan, the Property is designated on the FLUM for "Local Public Facilities (LPUB)" (**Figure 1**). As shown in **Figure 2**, the GPM identifies the Property as part of the "Neighborhood Conservation Areas."

The Project's proposed density is not inconsistent with both the FLUM and GPM designations. **Table 1** below identifies the specific Comp Plan policies that will be advanced by the Project, including policies that explicitly focus on advancing racial equity, as identified by the Equity Crosswalk.

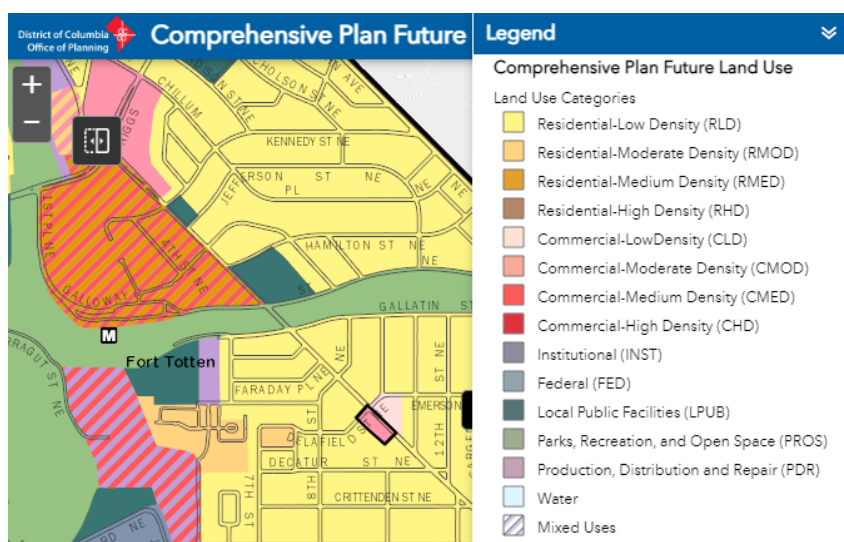


Figure 1: FLUM showing the Property designated for "Local Public Facilities (LPUB)"

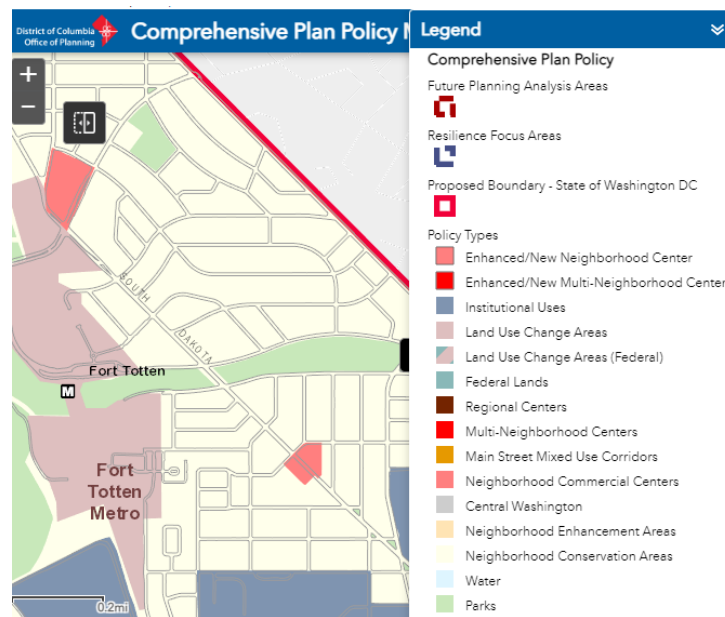


Figure 2: GPM showing the Property located within Neighborhood Conservation Areas

Table 1: Summary of Comp Plan Policies Advanced by the Proposed Campus Plan*
Upper Northeast Area Element
UNE-1.1.1, UNE-1.1.3, UNE-1.2.1
Land Use Element
LU-1.4.9, LU-2.2.4, LU-2.3.5, LU-3.3.1, LU-3.3.2
Transportation Element
T-1.1.8, T-2.4.1, T-2.4.2, T-2.4.3, T-3.1.1, T-3.3.7
Environmental Protection Element
<u>E-1.1.2</u> , E-1.1.4, E-1.1.5, E-2.1.3, E-3.2.7, E-4.1.1, E-4.1.2, E-4.1.3, E-4.3.1, E-4.3.3, E-4.3.6, <u>E-6.7.1</u> , E-7.2.2, E-7.3.2
Economic Development
ED-2.4.1, ED-2.4.4, ED-4.1.3, ED-4.1.4, ED-4.2.1, ED-4.2.2, <u>ED-4.2.3</u>
Parks, Recreation, and Open Space Element
PROS-1.2.2, PROS-3.1.6
Urban Design Element
UD-1.4.1, UD-2.2.7, UD-3.2.5, UD-4.2.2, UD-4.2.4
Community Services and Facilities Element
<u>CSF-1.1.11</u>
Educational Facilities
EDU-1.5.1, EDU-1.5.3, EDU-2.1.3, EDU-3.1.1, EDU-3.1.2, <u>EDU-3.1.A</u> , EDU-3.2.1, EDU-3.2.3, EDU-3.2.4, EDU-3.2.5, EDU-3.2.6, EDU-3.3.1, EDU-3.3.2, EDU-3.3.3, <u>EDU-3.3.8</u> , EDU-3.3.10, EDU-3.3.11
Arts and Culture Element
AC-1.2.3, <u>AC-1.2.7</u> , AC-2.1.1, AC-2.2.3, AC-2.2.8

*Note: Policies in **bold underlined** text denote policies that are specifically referenced in the OP Equity Crosswalk as being explicitly focused on advancing equity.

3. 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. (10A DCMR § 213.7.) As a process, a racial equity lens is employed when the most impacted by structural racism are meaningfully involved in the creation and implementation of the policies and practices that impact their lives. The Zoning Commission’s Racial Equity Tool places a heavy emphasis on community outreach and engagement, which are expected to begin at the inception of any proposed zoning action. All submissions to the Zoning Commission shall be accompanied by a discussion of efforts taken by an applicant to meaningfully engage the community early in the zoning process.

The information contained in **Table 2** addresses the questions set forth in Part II of the REA tool (Community Outreach and Engagement). The responses were informed by the Applicant’s research on the community that could potentially be impacted by the zoning action as well as the Applicant’s direct and intended outreach to the affected community.

Table 2: Community Outreach and Engagement
Description of the affected community (including defining characteristics).
<p><u>Affected Community:</u> ANC 5A is the “affected ANC” and represents the Brookland, Fort Lincoln, Fort Totten, Lamond-Riggs, Michigan Park, North Michigan Park, Queens Chapel, and Woodridge neighborhoods. The Applicant has engaged with the Commissioners of ANC 5A, including the Single Member District (“SMD”) representative for the Property. The Applicant will continue to work closely with ANC 5A to identify community outreach strategies, including to nearby buildings, condominium associations and property managers.</p> <p><u>Defining Characteristics:</u> The affected community is located in Ward 5, and the Lamond-Riggs Campus (f/k/a Bertie Backus Campus) is located at the borders of the Lamond-Riggs, Fort Totten, and Queens Chapel neighborhoods. The demographic makeup of the Upper Northeast Area* is approximately 21% White, 65% Black or African American, 3% Asian, 10% Hispanic, 0.1% Native Hawaiian and Other Pacific Islander, and 0.3% American Indian and Alaska Native.</p> <p>* Source: 2017-2021 ACS (https://opdatahub.dc.gov/search?tags=racial%20equity)</p>
Characteristics of the affected community that influenced outreach plan/efforts.
<p>Given UDC’s HBCU status, it was integral to the Applicant’s outreach efforts to prioritize the needs and concerns of the Black and African American communities surrounding the Lamond-Riggs Campus. It was important to engage with local civic organizations to incorporate their ideas into programmatic updates proposed in the Campus Plan.</p>
Community outreach timeline/dates of major meetings and points of engagement.
<p>The dates of meetings and points of engagement are as follows:</p> <ul style="list-style-type: none"> • 10/14/22 – Applicant team discusses Project with an Advisory Committee at UDC, consisting of students, faculty, and staff • 10/18/22 – Applicant emails OP to introduce Project • 10/19/22 – Applicant team presents to local civic groups and other local stakeholders to introduce Project and conduct a SWOT analysis, identifying Strengths, Weaknesses, Opportunities, and Threats guiding the Project • 11/03/22 – Applicant team meets with other UDC’s Community College leadership to discuss short-term and long-term vision for Project • 11/16/22 – Applicant team holds virtual meeting with ANC 5A to discuss the Project and community feedback received thus far

- 11/21/22 – Applicant launches survey for internal (students, faculty, staff) and external (neighboring residents) participants
- 12/01/22 – Applicant launches a website dedicated to the Lamond-Riggs Campus Master Plan
- 12/09/22 – Surveys close and Applicant team reconvenes with Advisory Committee for general project updates
- 12/14/22 – Applicant team meets with UDC Executive Cabinet and UDC President to discuss the proposal and its status
- 01/04/23 – Applicant team meets with DDOT to discuss traffic-related issues and remediation efforts addressed in the Campus Plan application
- 01/25/23 – Applicant coordinates scheduling of a briefing with ANC 5A01 Commissioner Malone
- 01/30/23 – Applicant team meets with ANC 5A01 Commissioner Malone to describe project updates and next steps
- 01/31/23 – Applicant meets with UDC’s Board of Trustees’ Operations Committee to discuss specifics and operational strategies of Project
- 02/01/23 – NOI mailed to 200-footers and ANC 5A
- 02/07/23 – Applicant team meets with UDC Board of Trustees to brief the Board on the Project and its status
- 03/01/23 – Applicant team meets with UDC Executive Cabinet to discuss Project updates
- 04/14/23 – Applicant team provides updates to UDC BOT’s Operations Committee
- 04/26/23 – Applicant presents at ANC 5A’s monthly meeting
- 05/05/23 – Applicant emails Art Place at Fort Totten development team to coordinate a briefing of Project
- 05/09/23 – Applicant emails OP to provide Project updates and coordinate an updated briefing
- 05/11/23 – Applicant discusses Project status with Art Place at Fort Totten development team
- 05/16/23 – Brief updates are provided to ANC 5A01 Commissioner Malone and ANC 5A09 Commissioner Ammerman
- 05/22/23 – Updated briefing held with OP
- 05/22/23 – Applicant team meets with ANC 5A01 and constituents to discuss Project updates and solicit additional feedback
- 08/28/23 – Applicant announces a public meeting with community stakeholders to address outreach/engagement concerns; flyers distributed to ANC5A
- 09/07/23 – Community meeting held with local civic organizations and local stakeholders
- 09/13/23 – Applicant emails ANC 5A Commissioners to coordinate inclusion of Lamond-Riggs Campus Plan application on the ANC’s monthly meeting agenda for September
- 09/14/23 – Applicant and ANC 5A Commissioners confirm meeting date
- 09/27/23 – Applicant presents virtually at ANC’s monthly public meeting

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

Virtual meetings and email/phone communications.

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

The community has expressed excitement over the potential changes that could result from the zoning action. Specifically, community members, including UDC students and staff, recognize the renovation needs to the Lamond-Riggs Campus building as significant. Additionally, community members voiced programming needs at the campus, including the expansion of UDC’s workforce development programs and expansion of the Urban Food Hub programming. As part of the Campus Plan approval, the Applicant will explore the expansion of these programs.

Members of the affected community that would potentially be burdened by the proposed zoning action.
No community displacement will result from approval of the requested zoning action. The building upgrades and programming updates described within the campus plan are contained to the Lamond-Riggs Campus site. Some residents could experience construction-related disruptions to travel around the Project. Some residents could experience traffic-related impacts from the Project and its associated construction/development.
Community input on existing conditions and current challenges that have resulted from past or present discrimination, and current ongoing efforts in the affected community to address these conditions.
Thus far, the Applicant's outreach has been focused on the ANC 5A Commissioners, neighborhood residents, and the UDC community. The community was excited to hear about invested improvement on the campus. Community members commented on facility upgrades that are greatly needed at the Lamond-Riggs Campus, as well as traffic- and pedestrian- related concerns along major thoroughfares such as South Dakota Avenue NE. Local civic organizations aim to call attention to these issues, and the Applicant makes reference to such concerns in the Campus Plan. The Applicant looks forward to continuing to engage on these matter during on-going community outreach efforts and will update the Commission accordingly.
Potential positive outcomes of the proposed zoning action identified by the affected community.
As stated above, ANC 5A and communities affected by the proposed zoning action have expressed excitement over the potential changes. Community members notes that increased safety on and around the campus, improved visibility and design of the campus, and an expansion of Community College programming as explored in the Plan would be largely positive outcomes.
Potential negative outcomes of the proposed zoning action identified by the affected community.
Community members have identified potential challenges with the Applicant's proposal concerning the phased development approach, noting in particular the provision of improvements to the pedestrian realm included in Phase Two of the Project. Due to the limitations of funding available for each phase, and due to forthcoming improvements proposed by DDOT along South Dakota Avenue NE (no completion date known), the Applicant identifies pedestrian improvements that can be incorporated in Phase One in the Campus Plan.
Changes/modifications made to the proposed zoning action that incorporate/respond to the input received from the affected community.
As requested by community members, the Applicant has updated campus character provisions to include signage for bike parking on campus, and the Applicant has updated sustainability provisions to include native plantings in new landscaping. The Applicant will work with the community to ensure that the Project is constructed in accordance with the needs and desires of the community and responsive to the policy goals and objectives outlined in the Comprehensive Plan.
Input received from the affected community not incorporated into the proposed zoning action.
Community members inquired about additional wayfinding signage from public transportation to the Campus, as well as a provision for more recycle bins outside the Campus. As these items relate to areas outside the scope of the Project, this input could not be incorporated into the proposed zoning action.
Efforts taken to mitigate potential negative outcomes identified by the affected community.
The Applicant will explore ways to include interim pedestrian improvements while proposed DDOT improvements are pending as an effort to mitigate potential negative outcomes identified by the affected community.

4. Disaggregated Data

Part III of the REA Tool also calls for the Applicant to provide disaggregated data regarding race and ethnicity in the planning area. The data is intended to assist the Commission in assessing the requested

zoning action through a racial equity lens. Accordingly, **Table 3** provides the requested data in the Upper Northeast Planning Area.

Table 3: UNE Planning Area Demographic and Socioeconomic Data*				
	UNE (Black/African American)	UNE (White)	UNE (all races)	District (all races)
Population	47,386	15,380	72,492	683,154
Age (65+ yrs.)	8,480	869	10,178	83,199
Unemployment Rate (16+ yrs.)	11.7	2.7	8.8	7.1
Median Household Income	\$60,297	\$149,670	\$72,583	\$93,547
Tenure (Owner/Renter)	42.7%/57.3%	59.8%/40.2%	45.7%/54.3%	41.5%/58.5%
Housing Cost Burdened	40.4% (all races)			36.1%

*Source: 2017-2021 ACS (<https://opdatahub.dc.gov/search?tags=racial%20equity>)

5. Racial Equity as an Outcome

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

Table 4 below correlates the Application with several equitable development indicators. Among others, the indicators addressed below include those that are specifically included in Part IV (Criteria to Evaluate a Zoning Action Through a Racial Equity Lens) of the REA Tool. As demonstrated in the table below, the outcomes of the Project have the potential to positively impact racial equity.

Table 4: Evaluation of Equitable Development Indicators		
Key:	Positive Outcome	Negative Outcome
Indicator	Aspect(s) of Zoning Action Relating to Racial Equity	Potential Racial Equity Outcome
Displacement (Direct and Indirect)		
Physical (Direct)	<ul style="list-style-type: none"> The Project will not cause physical displacement of tenants or residents as the Property does not currently contain any residential use. 	
Economic (Indirect)	<ul style="list-style-type: none"> Indirect displacement of tenants or resident is not expected to occur in the area surrounding the Project. Indirect displacement is not expected to occur, thus no mitigation is necessary. 	
Cultural (Indirect)	<ul style="list-style-type: none"> The Application will not cause any cultural displacement as no housing is proposed as part of the development. 	
Housing		
Availability of Housing	<ul style="list-style-type: none"> Housing is not proposed as part of this Campus Plan 	
Preservation of Affordable Housing	<ul style="list-style-type: none"> No affordable housing is currently on the Property. 	
Replacement Housing	<ul style="list-style-type: none"> No housing is currently on the Property. 	

Housing Burden	<ul style="list-style-type: none"> No housing is currently on the Property or is proposed to be constructed as part of this Campus Plan. 	
Homeownership Opportunity	<ul style="list-style-type: none"> The Project does not provide homeownership opportunities. 	
Larger Unit Size	<ul style="list-style-type: none"> The Project does not propose housing units on Property. 	
Employment		
Entrepreneurial Opportunities	<ul style="list-style-type: none"> UDC Community College programming will continue to provide job training and workforce development opportunities for students. 	
Job Creation	<ul style="list-style-type: none"> Job opportunities will be created through the ground floor retail proposed in Wing B. 	
Access to Employment	<ul style="list-style-type: none"> The ground floor retail will provide opportunities for employment. Public transit system improves residents' ability to access employment. 	
Transportation/Infrastructure		
Public Space/Streetscape Improvements	<ul style="list-style-type: none"> Reconstruction of the public realm, including streetscape to meet or exceed DDOT standards. 	
Infrastructure Improvements	<ul style="list-style-type: none"> On-site infrastructure improvements include facility upgrades, pedestrian connectivity improvements, improvements to the parking areas 	
Access to Transit	<ul style="list-style-type: none"> The Project proposes improved wayfinding and promotes the use of public transit 	
Pedestrian Safety	<ul style="list-style-type: none"> The Project encourages pedestrian, bicycle, and public transit options as improvements are made to the parking areas, thereby decreasing the amount of vehicular parking available on site. Pedestrian connectivity will be improved around campus, and new pedestrian pathways will provide direct access to Hamilton Street NE and Galloway Street NE. 	
Education/Health/Wellness		
Schools	<ul style="list-style-type: none"> The Campus Plan accommodates for the University's increased enrollment opportunities. The Plan notes that enrollment is targeted to increase to 3,000 students at the Lamond-Riggs Campus by 2033. 	
Healthcare	<ul style="list-style-type: none"> The Project does not propose any changes to healthcare. 	
Open Space/Recreational	<ul style="list-style-type: none"> The Project will increase the amount of open green space on the Property The Project proposes a courtyard as one of the Project amenities Additional amenities include seating areas, a new plaza at the corner of Galloway Street NE and South 	

	Dakota Avenue NE, and improvements to an existing pocket park on site <ul style="list-style-type: none"> The proposed Wing D will use architectural elements intended to improve connectivity to the adjacent Fort Circle Park 	
Environmental		
Environmental Changes	<ul style="list-style-type: none"> The Project will add to the tree canopy coverage in the District 	
Sustainable Design	<ul style="list-style-type: none"> The Campus Plan includes structural improvements for solar-readiness at the existing building, and the new Wing D will have a green roof Landscaping improvements will include new bioretention areas and stormwater management facilities 	
Remediation	<ul style="list-style-type: none"> The Project does not propose any remediation changes. 	
Access to Opportunity		
Neighborhood Retail and Service Uses	<ul style="list-style-type: none"> A new student center and ground floor retail (including a coffee stand) is proposed as part of the Campus Plan 	
Programming	<ul style="list-style-type: none"> UDC's Community College explores ways to expand programming opportunities as part of the Campus Plan and to involve community members with on-campus events 	

IV. Comprehensive Transportation Review

The Applicant's transportation consultant, Gorove Slade, has prepared an updated Comprehensive Transportation Review ("CTR") study, included herein. The CTR was filed with DDOT on September 15, 2023 and it was submitted under ZC Case No. 23-16 on September 26, 2023. The CTR and associated attachments can be found at **Exhibit 12** and **Exhibit 12A** of the record.

If you have any questions, please do not hesitate to contact me on behalf of the Applicant. Thank you for your attention to this application.

Sincerely,

COZEN O'CONNOR



By: Meredith H. Moldenhauer

MHM

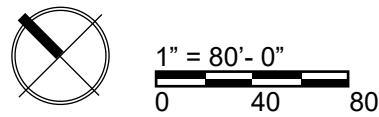
TAB A

LAMOND-RIGGS CMP
PROPOSED CAMPUS DEVELOPMENT
PLAN - MODERNIZATION
(PHASE 1)

Modernization A, B, C: Programing **utility** upgrades as required, Electrical system upgrade, **HVAC system** replacement, and **solar panel** installation.

LEGEND

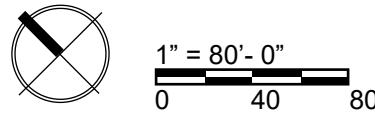
- Campus Boundary
- Bio-Retention
- Existing Bio-Retention
- Photovoltaic Panels
- New Mechanical Penthouse
- Modernization
- Proposed Tree Canopy
- Existing Tree Canopy
- Building Entry
- Short-Term Bicycle Spaces - 48
- Short-Term (Covered) Bicycle Spaces - 16
- Long-Term (Covered) Bicycle Spaces - 17
- Overall Total Bicycle Spaces: 81
- 1 Existing Green Space
- 2 Existing Pocket Park
- 3 Existing Bio-Retention
- 4 Existing Equipment
- 5 Loading Service Area
- 6 Improved Vehicular Access
- 7 Access to Public Sidewalk
- 8 Drop-off / Pick-up Area
- 9 Bicycle Parking Signage



LAMOND-RIGGS CMP
PROPOSED CAMPUS DEVELOPMENT
PLAN - COURTYARD
(PHASE 2)

LEGEND

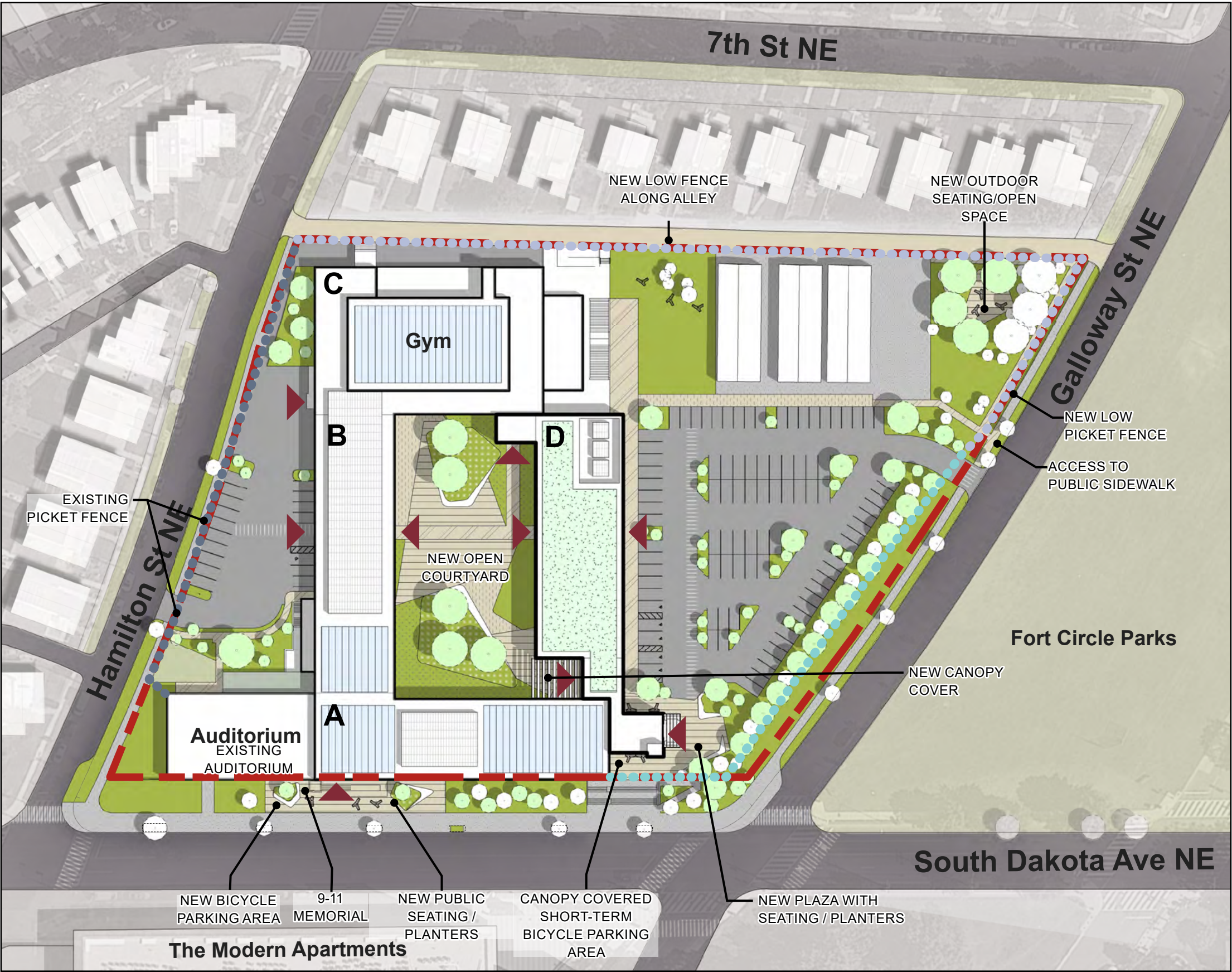
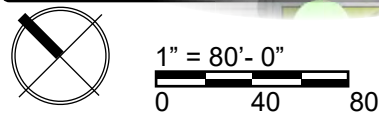
- Campus Boundary
- Bio-Retention
- Existing Bio-Retention
- Photovoltaic Panels
- New Mechanical Penthouse
- Green Roof
- Proposed Tree Canopy
- Existing Tree Canopy
- Building Entry
- Short-Term Bicycle Spaces - 68
- Short-Term (Covered) Bicycle Spaces - 24
- Long-Term (Covered) Bicycle Spaces - 25
- Overall Total Bicycle Spaces: 117
- 1 Loading Service Area
- 2 Existing Demonstration Kitchen
- 3 New Metal Picket Fence
- 4 New Pocket Park with Outdoor Seating
- 5 New Additional Screen Vegetation
- 6 9-11 Memorial
- 7 Access to Public Sidewalk
- 8 Drop-off / Pick-up Area
- 9 Bicycle Parking Signage



LAMOND-RIGGS CMP
PROPOSED LANDSCAPE
IMPROVEMENT DIAGRAM
(PHASE 2)


LEGEND

- Campus Boundary
- Storm-water Management
- Photovoltaic Panels
- Green Roof
- Proposed Tree Canopy
- Existing Tree Canopy



LAMOND-RIGGS CMP
FUTURE BICYCLE FACILITIES
(PHASE 2)

LEGEND

- Campus Boundary
- Existing Bicycle Paths
- Unfunded Bicycle Protected Lanes
- Unfunded Bicycle Collector Facility
-  Capital Bicycle Station



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