

EXHIBIT G

COMPLIANCE WITH THE COMPREHENSIVE PLAN

The proposed PUD advances the purposes of the Comprehensive Plan, is consistent with the Future Land Use Map and Generalized Policy Map, complies with the guiding principles in the Comprehensive Plan, and furthers a number of the major elements of the Comprehensive Plan.

1. Purposes of the Comprehensive Plan

The purposes of the Comprehensive Plan are six-fold: (1) to define the requirements and aspirations of District residents and, accordingly, influence social, economic and physical development; (2) to guide executive and legislative decisions on matters affecting the District and its citizens; (3) to promote economic growth and jobs for District residents; (4) to guide private and public development in order to achieve District and community goals; (5) to maintain and enhance the natural and architectural assets of the District; and (6) to assist in conservation, stabilization, and improvement of each neighborhood and community in the District. (D.C. Code §1-245(b)).

The PUD significantly advances these purposes by promoting the social, physical, and economic development of the District through the provision of a high-quality new office building and incorporation of the existing O Street Pumping Station on the Subject Property without generating any adverse impacts.

2. Future Land Use Map

The Comprehensive Plan Future Land Use Map designates the Subject Property in the mixed-use Medium Density Commercial and Medium Density Residential land use categories (*see Exhibit C*).

The Medium Density Commercial category is used to define areas where buildings are generally larger and/or taller than those in moderate density commercial areas but generally do not

exceed eight stories in height. The C-2-B, C-2-C, C-3-A, and C-3-B Zone districts are generally consistent with this land use category, although other zones may apply in some locations. The Medium Density Residential designation is used to define neighborhoods or areas where mid-rise (4-7 stories) apartment buildings are the predominant use. Pockets of low and moderate density housing may exist within these areas. The Medium Density Residential designation also may apply to taller residential buildings surrounded by large areas of permanent open space. The R-5-B and R-5-C Zone districts are generally consistent with the medium-density designation, although other zones may apply in some locations.

The Framework Element of the Comprehensive Plan provides that the Land Use Map is not a zoning map. *See* 10A DCMR § 226.1(a); *see also* Z.C. Order No. 13-05; Z.C. Order No. 11-13; and Z.C. Order No. 10-28. Whereas zoning maps are parcel-specific and establish detailed requirements for setback, height, use, parking, and other attributes, the Future Land Use Map does not follow parcel boundaries and its categories do not specify allowable uses or dimensional standards. By definition, the Future Land Use Map is to be interpreted broadly. 10A DCMR § 226.1(a). Furthermore, the land use category definitions describe the general character of development in each area, citing typical building heights (in stories) as appropriate. The granting of density bonuses (for example, through Planned Unit Developments) may result in heights that exceed the typical ranges cited. *Id.* at § 226.1(c); *see also* Z.C. Order No. 13-05, Finding of Fact No. 51. 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 § 266.1(d).

In evaluating the proposed map amendment, the Subject Property should be viewed in context and not as an isolated parcel. Accordingly, when taken in context with the surrounding

neighborhood, the Applicant's proposal to rezone the property from the CG/W-2 District to the CG/CR District in order to construct a new office building for DC Water is consistent with the Comprehensive Plan designations of the Subject Property. Approval for nearby developments (e.g. the Forest City development located adjacent to the Subject Property to the west, approved pursuant to Z.C. Order No. 13-05) concluded that the proposed CR District is not inconsistent with the Comprehensive Plan. *See* Z.C. Case No. 13-05, Exhibit 19. The proposed development of the Subject Property continues to reflect the density anticipated by the Future Land Use Map.

Furthermore, the proposed CG/CR zoning classification will enable the Subject Property to be developed with a maximum building height of 100 feet and a maximum density of 1.3 FAR, which is consistent with the amount of commercial density permitted in medium density commercial zones. For example, the C-2-B District permits a maximum density of 6.0 FAR, no more than 2.0 FAR of which may be devoted to non-residential uses; the C-2-C District permits a maximum density of 6.0 FAR, no more than 2.5 FAR of which may be devoted to non-residential uses; the C-3-A District permits a maximum density of 4.5 FAR, no more than 3.0 FAR of which may be devoted to non-residential uses; and the C-3-B District permits a maximum density of 5.5 FAR, no more than 4.5 FAR of which may be devoted to non-residential uses. 11 DCMR § 2405.2.

Finally, in Z.C. Order No. 13-05, the Commission found that a requested map amendment from the CG/W-1 District to the CG/CR District for property located directly adjacent to the Subject Property was not inconsistent with the Comprehensive Plan or the character of the surrounding area. The Commission stated that:

the proposed zoning is consistent with the Property's location near a Metrorail station, and property located across the street is located in the same zone district. The rezoning is necessary to permit the mix and density of uses appropriate for this strategic, transit-oriented site. Finally, the rezoning is part of a PUD application, which allows the Commission to review the design, site planning, and provision of public benefits and amenities against the requested zoning flexibility.

Z.C. Case No. 13-05, Finding of Fact No. 52.

In this case, rezoning of the Subject Property to the CG/CR District will be congruous with the adjacent property, will permit an appropriate mix of uses and densities for the surrounding area, and will allow for the PUD to move forward.

3. Generalized Policy Map

The Subject Property is located in the Land Use Change Area category on the District of Columbia Comprehensive Plan Generalized Policy Map (*see Exhibit D*). Land Use Change Areas are areas where change to a different land use from what exists today is anticipated. These areas include many of the city's large development opportunity sites and other smaller sites that are undergoing redevelopment or are anticipated to undergo development. The guiding philosophy in the Land Use Change Areas is to encourage and facilitate new development and to promote the adaptive reuse of existing structures. Many of the Land Use Change Areas have the capacity to become mixed-use communities containing housing, retail shops, services, workplaces, parks, and civic facilities. As Land Use Change Areas are redeveloped, the District aspires to create high quality environments that include exemplary site and architectural design and that are compatible with and do not negatively impact nearby neighborhoods. *See* 10A DCMR §§ 223.9 - 223.12.

The proposed rezoning and redevelopment of the Subject Property is consistent with the policies intended for Land Use Change Areas. The project will transform the Subject Property through the construction of a new office building that will integrate well with the new residential, retail, and recreational uses in the surrounding area and draw additional employees and visitors to the emerging neighborhoods along the Anacostia Riverfront. The project involves the incorporation of the existing O Street Pumping Station while facilitating development of a major new workplace in a high-quality environment that includes exemplary site and architectural design.

The Subject Property is also located within the Central Employment Area (“CEA”), which is the business and retail heart of the District and the metropolitan area. The CEA has the widest variety of commercial uses, including but not limited to major government and corporate offices, and draws patrons, workers, and visitors from across the region. 10A DCMR § 223.21. The project’s proposed use, height, and density are particularly appropriate given its location in the CEA.

4. Compliance with Guiding Principles of the Comprehensive Plan

The PUD is consistent with the guiding principles in the Comprehensive Plan for managing growth and change, creating successful neighborhoods, increasing access to education and employment, and building green and healthy communities.

a. Managing Growth and Change.

In order to manage growth and change in the District, the Comprehensive Plan encourages the growth of both residential and non-residential uses, and states that non-residential growth benefits residents by creating jobs and opportunities for less affluent households to increase their income. 10A DCMR § 217.4. The Comprehensive Plan also states that redevelopment and infill opportunities near transit stations is an important component of reinvigorating and enhancing neighborhoods.

The proposed PUD is fully-consistent with these goals. Currently the administration functions for DC Water are located in a five-story building at the Blue Plains campus, known as the Central Operations Facility (“COF”). The COF has reached its capacity, necessitating the use of much-valued land at Blue Plains for office trailers, rather than for its intended use.

To alleviate the overcrowding at the COF and to free-up land for use in the expansion and improvement of the plant processing operations, DC Water needs to construct a new headquarters building. This proposed new building will, among other things, consolidate and relocate all

administration-related personnel into one centrally-located facility. Furthermore, the project's location in close proximity to the Navy Yard Metrorail station and multiple bus routes will respect the broader community context and will add to the revitalization of the neighborhood.

b. Creating Successful Neighborhoods.

One of the guiding principles for creating successful neighborhoods is getting public input in decisions about land use and development, from development of the Comprehensive Plan to implementation of the plan's elements. The proposed PUD furthers this goal since, as part of the PUD process, the Applicant will be working with Advisory Neighborhood Commission ("ANC") 6D, the ANC within which the Subject Property is located, to ensure that the development provides a positive impact on the immediate neighborhood.

c. Increasing Access to Education and Employment

This guiding principal states that increasing access to jobs is fundamental to improving the lives and economic well-being of District residents. Sufficient land should be planned and zoned for new job centers in areas with high unemployment and under-employment. Consistent with this principal, the design and construction of the proposed building is subject to a Fair Share Objective for Minority and Women Business Enterprises program participation of 28% and 4%, respectively, for the professional services component (design phase), and 32% and 6%, respectively, for the construction component.

The design-builder, Skanska Building USE, is also required to (i) comply with the DC Water Works Employment Plan requirements, which include but are not limited to, providing an Employment Plan and apprenticeship information, and regularly submitting employment data through an online reporting system; and (ii) provide additional employment data as may reasonably be requested for presentation in DC Water's Employment Report to the Board of Directors and

others on a periodic basis at no additional cost to the project. The program also requires the contractor to flow down the Employment Plans to first and second tier subcontractors that meet certain criteria, and to comply with reasonable requirements of the permanent program that may be imposed during the employment program development process and/or at incorporation of the permanent employment program into the contract.

d. Building Green and Healthy Communities.

A major objective for building green and healthy communities is that building construction and renovation should minimize the use of non-renewable resources, promote energy and water conservation, and reduce harmful effects on the natural environment. As discussed in the preliminary application statement, the proposed building will include a substantial number of sustainable design features.

5. Land Use Element

For the reasons discussed above, the project supports the following policies of the Land Use Element:

a. Policy LU-1.2.7: Protecting Existing Assets on Large Sites

The project will preserve and protect the existing O Street Pumping Station on the Subject Property, and incorporate the new office building around the existing structure as the Subject Property is redeveloped.

b. Policy LU-1.2.8: Large Sites and the Waterfront

Redevelopment of the Subject Property along the Anacostia waterfront will help achieve related urban design, open space, environmental, and economic development objectives. The project will significantly improve the Subject Property, and enhance the physical and environmental quality of the river.

c. Policy LU-1.3 Transit-Oriented and Corridor Development

The PUD exemplifies the principals of transit-oriented development. The Subject Property is located within convenient walking distance of multiple Metrobus routes and the Navy Yard Metrorail station. The location of the project will minimize the necessity of automobile use and will maximize transit ridership while respecting the character and needs of the surrounding area. More specifically, the project is consistent with *Policy LU-1.3.8*, which encourages the siting, retention, and modernization of public facilities such as government offices near transit stations.

d. Policy LU-2.2.4: Neighborhood Beautification.

This policy encourages projects to improve the visual quality of the District's neighborhoods. As shown on the Plans, the project architect designed the building to enhance the overall visual aesthetic of the neighborhood, which will be a major improvement to the current site condition. The project also includes a significant amount of landscaped areas, which will greatly enhance the sustainability of the site and the views of the Subject Property from the waterfront.

6. Transportation Element

The Applicant's proposal to develop a major new workforce center on the Subject Property will help further several policies and actions of the Transportation Element of the Comprehensive Plan, including:

a. Policy T-1.1.4: Transit-Oriented Development

The project is an excellent example of transit-oriented development due to its close proximity to multiple Metrobus routes and the Navy Yard Metrorail station and its location in a mixed-use neighborhood.

b. Policy T-1.3.1: Transit-Accessible Employment

The project will support transit-oriented and transit-accessible employment and will maximize the use of major transportation investments, such as the Metrorail, to enhance the overall

efficiency of the regional transportation system. The project will include transportation incentives for employees to reduce vehicle dependence.

c. Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning and Action T-2.3-A: Bicycle Facilities

As shown on the Plans, the project architect carefully considered and integrated bicycle and pedestrian safety considerations in the design of the project. The project will include secure bicycle parking on the Subject Property to encourage employees to bike to work.

7. Environmental Protection Element

The Environmental Protection Element addresses the protection, restoration, and management of the District's land, air, water, energy, and biologic resources. This element promotes specific environmental policies, including the following:

- Encouraging the planting and maintenance of street trees in all parts of the city (*Policy E-1.1.1*);
- Encouraging the use of landscaping to beautify the city, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity (*Policy E-1.1.3*);
- Promoting the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses (*Policy E-2.2.1*); and
- Promoting tree planting and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction (*Policy E-3.1.2*).

As discussed in preliminary application statement, the project includes street tree planting, landscaping, energy efficiency, and several methods to reduce stormwater runoff, and is therefore fully consistent with the Environmental Protection Element.

8. Economic Development Element

The goal of the Economic Development element is to:

[s]trengthen the District's economy by sustaining its core industries, attracting new and diverse industries, accommodating future job growth, fostering the success of small businesses, revitalizing neighborhood commercial centers, improving resident job skills, and helping a greater number of District residents find and keep jobs in the Washington regional economy.

10A DCMR § 701. Consistent with this goal, the PUD will strengthen and promote the District's economy by supporting the District government workforce. The project will help leverage the strengths of its economy and the region's skilled labor force and provide new employment opportunities to District residents. Consistent with *Policy ED-1.1.5: Use of Large Sites*, the PUD will ensure that the Subject Property's economic development potential is fully realized such that it will help revitalize the neighborhood and diversify the District economy, particularly given its location with convenient Metrorail access. The project will also help further *Policy ED-2.1.1: Office Growth* by accommodating growth in government along the Anacostia Waterfront.

9. Urban Design Element

The goal of the Comprehensive Plan's Urban Design Element is to:

[e]nhance the beauty and livability of the city by protecting its historic design legacy, reinforcing the identity of its neighborhoods, harmoniously integrating new construction with existing buildings and the natural environment, and improving the vitality, appearance, and security of streets and public spaces.

10A DCMR § 901.1. In keeping with this objective, the Applicant has aligned the proposed project with the character of the surrounding neighborhood. Consistent with *Policies UD-2.2.1: Neighborhood Character and Identity* and *UD-2.2.7: Infill Development*, the PUD will strengthen the architectural quality of the immediate neighborhood by relating the project's scale to the existing context, including both existing and approved development projects. In addition, as shown on the Plans, the project includes elegant, visually-interesting, and well-designed building

façades that eschew monolithic or box-like forms and long blank walls that detract from the quality of the streetscape. *See Policy UD-2.2.5.*

10. Infrastructure Element

The proposed PUD is fully consistent with many of the policies and actions set forth in the Infrastructure Element, including improving water quality and modernizing the aging water distribution system. *See 10A DCMR § 1300.4.* The PUD will support *Policy IN-1.1.1: Adequate Water Supply* by allowing for the construction of the new headquarters building for DC Water, such that DC Water can provide a safe and adequate water supply to serve current and future District needs. The project will also further *Policies IN-1.2.1: Modernizing and Rehabilitating Water Infrastructure* and *IN-1.2.2: Ensuring Adequate Water Pressure* by ensuring that DC Water has adequate facilities to repair and replace aging infrastructure; to upgrade the water distribution system to meet current and future demand; and to ensure that DC Water can provide adequate water supply and pressure to all areas of the District.

Furthermore, with respect to wastewater and stormwater systems, the PUD will provide new office facilities such that DC Water will be able to ensure that the following policies will be implemented safely and effectively, as envisioned by the Comprehensive Plan:

- *Policy IN-2.1.1: Improving Wastewater Collection;*
- *Policy IN-2.1.2: Investing in our Wastewater Treatment Facilities;*
- *Policy IN-2.1.3: Sludge Disposal;* and
- *Policy IN-2.2.1: Improving Stormwater Management.*

11. Lower Anacostia and Near Southwest Area Element

The Subject Property is located within the boundaries of the Lower Anacostia and Near Southwest Area Element. The proposed PUD is consistent with and advances many goals and

policies of the Area Element that are intended to guide growth and neighborhood conservation decisions. For example, as called for in *Policies AW-1.1.2: New Waterfront Neighborhoods* and *AW-1.1.3: Waterfront Area Commercial Development*, the project will provide a new use on underutilized waterfront land and will establish new office space for government activities. More specifically, the Subject Property is located in the Near Southeast policy focus area in the Anacostia Waterfront Planning Area, which requires a heightened level of direction and guidance. The PUD is consistent with the goals of this focus area because it will help create an identity in the Near Southeast that celebrates the area's history and integrates the existing DC Water pumping station. *See Policy AW-2.3.7: Near Southeast Historic Identity.*