Executive Director's Recommendation

Commission Meeting: March 4, 2021

PROJECT
Comprehensive Plan for the National Capital: Federal Elements – Amendments to the 2016 Federal Workplace Element

SUBMITTED BY
National Capital Planning Commission

REVIEW AUTHORITY
Preparation and Adoption of Federal Elements
per 40 U.S.C. § 8721

NCPC FILE NUMBER
CP01G

NCPC MAP FILE NUMBER
00.00(00.00)45274

APPLICANT'S REQUEST
Adoption of the updated 2016 Federal Workplace Element of the Comprehensive Plan for the National Capital: Federal Elements

PROPOSED ACTION
Adopt updated element as requested

ACTION ITEM TYPE
Staff Presentation

PROJECT SUMMARY

Following the draft update of the Federal Workplace Element, the novel coronavirus (COVID-19) pandemic emerged and resulted in immediate changes to the economy and operations of the federal workplace. Because of the unknown long-term implications of the current pandemic on the federal workplace, staff will put the full update of the Element on hold. Over the next year, staff will continue to study the potential long-term impacts to the planning, location, and design of federal workplaces post-COVID-19 and update the Element accordingly.

Currently, staff requests the Commission only adopt changes to the Central Employment Area (CEA). The proposed amendments are limited to the description, boundary, and policy (FW.A.2) of the 2016 Federal Workplace Element that pertain to the CEA. NCPC prioritizes federal workplace locations within Washington's official CEA. The U.S. General Services Administration (GSA) uses the CEA boundary for federal leasing purposes in Washington, DC. The CEA is located within the Federal Workplace Element of the *Comprehensive Plan for the National Capital: Federal Elements* (Comprehensive Plan), and the change would become effective 60 days after the publication of the Federal Register notice.

On July 11, 2019, the Commission released the draft element for a 60-day public comment period that closed on September 16, 2019. Many of the comments received during the public comment period were related to the bounds and limits of the CEA. There are existing boundary discrepancies between the Federal and District Elements. Following the draft release, staff worked with the DC Office of Planning (DCOP) to update the joint Federal and District designated CEA in consultation with the GSA and the Office of the Deputy Mayor for Planning and Economic Development. This

proposed amendment reflects NCPC and the District's joint effort to make the CEA boundary and definition consistent in the Federal and District Elements.

Following Commission adoption, staff will incorporate any changes as directed and complete minor editorial updates to the text and graphics to ensure document accuracy and consistency. In addition, NCPC staff will notify applicant agencies, regional partners, and the public of the new effective date of the amendments to the Federal Workplace Element.

KEY INFORMATION

- The proposed amendment to the 2016 Federal Workplace Element is limited to the CEA policy, narrative, and map. The overall Element update will be placed on hold while staff studies the potential long-term impacts to the planning, location, and design of federal workplaces post-COVID-19.
- In response to comments and feedback, the Element incorporates a revised CEA boundary, definition, and policy. NCPC and DCOP worked together in consultation with GSA and the Office of the Deputy Mayor for Planning and Economic Development to update the boundary and definition to be consistent in the Federal and District Elements.
- The revised policy will replace FW.A.2 in Section A of the 2016 Federal Workplace Element. The revised policy related to the CEA will go into effect 60-days after the publication of the Federal Register notice.
- The update includes two new action items to consider other approaches to the CEA and to collaborate with federal, regional, and local jurisdictions to identify appropriate federal employment locations in the National Capital Region beyond the CEA.

RECOMMENDATION

The Commission:

Approves the amendments to the boundary, definition, and policy of the Central Employment Area in the 2016 Federal Workplace Element of the *Comprehensive Plan for the National Capital: Federal Elements*, pursuant to 40 U.S.C. § 8721.

Approves the new action items for the 2016 Federal Workplace Element, to be included in the Comprehensive Plan's 2016 Action Plan. The 2016 Action Plan contains specific projects to advance the Commission's vision and the necessary steps to activate the plan's goals and policies.

Defers action on further changes to the Federal Workplace Element, while staff continues to study the potential long-term impacts to the planning, location, and design of federal workplaces post-COVID-19.

Notes the NCPC and DCOP worked together in consultation with the GSA and the Office of the Deputy Mayor for Planning and Economic Development to update the boundary and definition to be consistent in the Federal and District Elements. NCPC and DCOP will continue to work with

the GSA to encourage them to use the amended Central Employment Area as part of their site selection and leasing solicitation process.

Notes the old Central Employment Area and policy FW.A.2 in the 2016 Federal Workplace Element policies will remain in effect for 60-days after the publication of the Federal Register notice announcing the adoption of the revised 2016 Federal Workplace Element by the Commission.

Notes that for projects with special and unusual circumstances, applicant agencies can consult with NCPC staff to determine the applicable Federal Workplace Element policies.

Notes following Commission adoption, staff will incorporate any changes as directed by the Commission and will complete minor editorial updates to the text and graphics to ensure document accuracy and consistency.

PROJECT REVIEW TIMELINE

Previous actions	**February 2016** – Last adoption of the Federal Workplace Element. **July 2019** – Commission authorized release of the draft Federal Workplace Element for a 60-day public comment period.
Remaining actions (anticipated)	Final adoption of the Federal Workplace Element update (HOLD).

PROJECT ANALYSIS

Executive Summary

In 2019, the Commission released a draft update to the Federal Workplace Element for public review and comment. Following the draft update, the COVID-19 pandemic emerged and resulted in immediate changes to the economy and operations of the federal workplace. The current pandemic may have long-term implications and change the overall landscape of the federal workplace. Staff will put the overall Element update on hold and continue to study the potential long-term impacts to the planning, location, and design of federal workplaces post-COVID-19, and update the Element accordingly. However, staff has identified one area that can be updated immediately.

The proposed amendment to the 2016 Federal Workplace Element is limited to changes to the Central Employment Area (CEA) (see Appendix A). Currently there are boundary discrepancies with the CEA between the Federal and District Elements. GSA also uses a different CEA boundary for federal leasing purposes in Washington, DC. This amendment reflects NCPC and District's joint effort to make the CEA boundary and definition consistent in the Federal and District Elements.

Analysis

Background

Since the 1969 Comprehensive Plan, NCPC has prioritized workplace locations within Washington's official CEA. The CEA reflects the region's primary commercial center and concentration of federal employment. The area incorporates the federal establishment's symbolic and physical heart and is the hub of various transit systems. Most of the CEA's federal facilities are within a quarter mile of a Metrorail station and connected to the station by a network of walkable streets. The GSA uses their CEA boundary as the primary area for federal leasing in Washington, DC.

On July 11, 2019, the Commission released the draft Federal Workplace Element for a 60-day public review and comment period. NCPC received multiple comments to update the Central Employment Area to have one shared boundary between the District and Federal Elements, along with the GSA's defined CEA (see Appendix B). The District and Federal Elements include a federal/District designation of a CEA, which prioritizes the location of federal workplaces in Washington.

Over the past two years, NCPC and DCOP worked together in consultation with the GSA and the Office of the Deputy Mayor for Planning and Economic Development to amend the CEA boundary to ensure that it reflects the District of Columbia's current priority areas for commercial development, mixed-use development, and transportation investments. NCPC staff proposes to revise the 2016 Federal Workplace Element to include a joint definition and boundary of the CEA,

which is consistent with the District's proposed amendments to the Land Use Element, currently before the Council of the District of Columbia as part of Bill 23-736, the Comprehensive Plan Amendment Act of 2020. NCPC and DCOP staff will continue to work with GSA on using the revised CEA. Therefore, staff has revised the 2016 Federal Workplace Element to include changes to the CEA description, boundary, and policy as summarized below.

Modifications to the Description and Definition

Staff revised the narrative on pages 7 and 8 of the 2016 Federal Workplace Element to reflect NCPC and the District's shared description and definition of the CEA. While the Comprehensive Plan defines the CEA, it does not include a specific process to review or update its boundaries. As the District and Federal Elements are updated, the CEA should be reevaluated each time to ensure that it is consistent with the District of Columbia's priority areas for commercial, mixed-use development, and transportation investments.

> **New Joint Definition of the Central Employment Area**
>
> *Both the District and Federal Elements include a joint federal/District designation of a Central Employment Area within Washington, DC. The CEA includes the existing "core" of federal facilities such as the U.S. Capitol Building, the White House, the Supreme Court, and most of the legislative, judicial, and executive administrative headquarters of the United States government. The Central Employment Area is the District of Columbia's commercial core where the greatest concentration of employment is encouraged.*

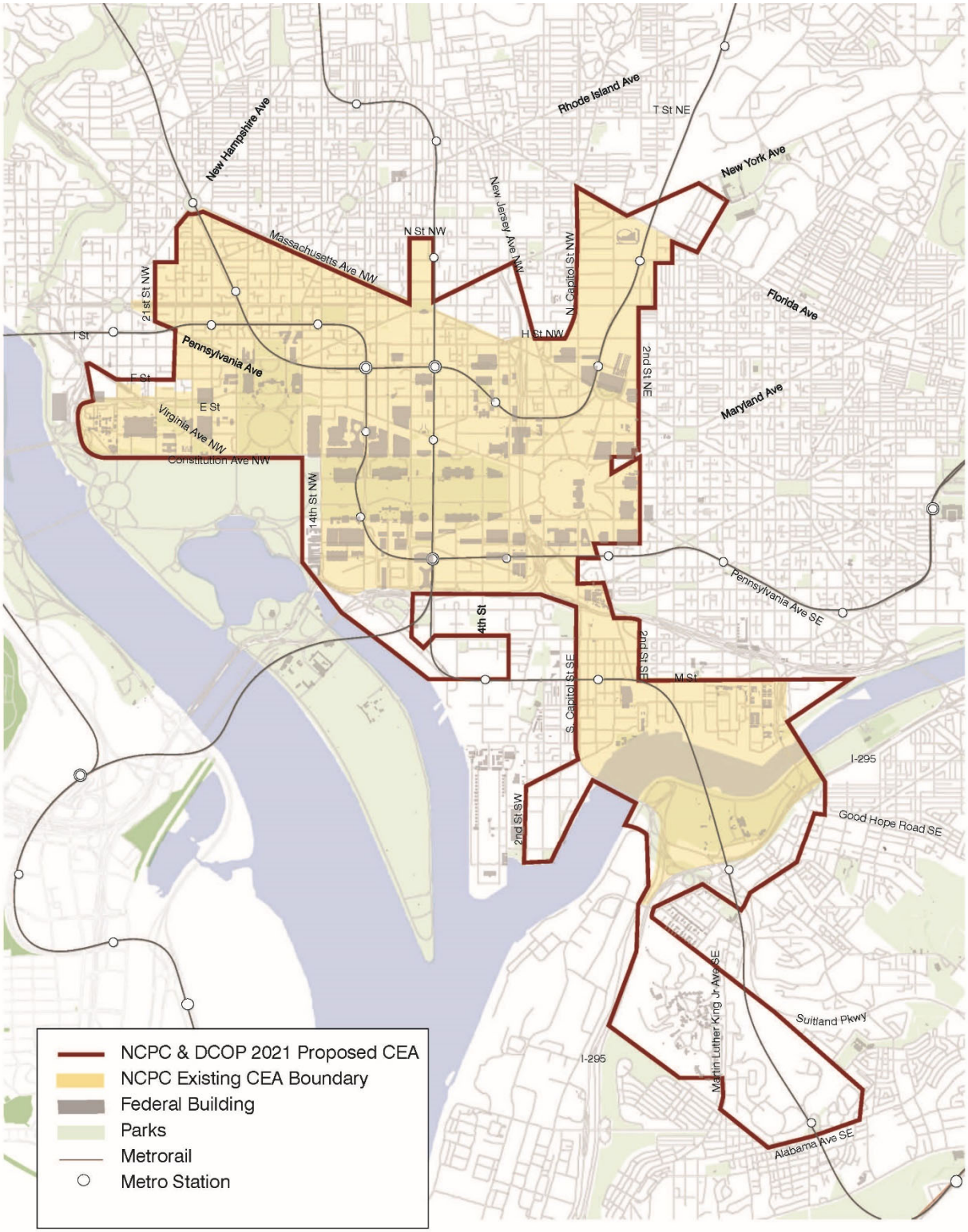
Modifications to the boundary

There are existing CEA boundary discrepancies between the Federal Elements and District Elements, as well as the boundary used by the GSA for leasing purposes (see Appendix C). NCPC and DCOP staff reviewed the three different boundaries and proposed changes to CEA boundary to capture adjacent federal facilities, removed areas that are no longer feasible based on existing planning development, and added areas to be in alignment with each other's or GSA's CEA.

NCPC staff received multiple comments from interest groups to add their properties to the revised CEA. Since the CEA boundary is contiguous, the amendments do not include all the requested properties. The revised 2016 Federal Workplace Element acknowledges that there are other federal employment areas outside of the CEA, where local land use conditions support the efficiency and productivity of federal activities. In urban areas, federal facilities should locate to the extent practicable in qualified opportunity zones or other employment areas that are recommended by local officials.

Considering Washington, DC's unique role as the seat of the federal government and nation's capital, this amendment proposes a new action item to explore expanded or alternative CEA approaches to designate locations, including non-contiguous sites for future federal facilities and uses.

Revised Joint Central Employment Area Boundary



The proposed amendments in the 2016 Federal Workplace Element also recognizes the need to collaborate with federal, regional, and local jurisdictions to identify appropriate federal employment locations in the region beyond the CEA. Identifying additional federal employment areas can help local and regional jurisdictions attract and retain federal employment and spur economic development. There are opportunities for local governments, business improvement districts, community groups, and/or developers to invest in new federal employment areas and provide amenities that attract the federal government. The amended element proposes a new action item for NCPC to work with regional and local jurisdictions in the future to identify federal employment locations beyond the CEA in the region.

New Action Items

Action Item 1

Considering Washington, DC's unique role as the seat of federal government and nation's capital, NCPC will work with GSA, the District of Columbia, and other stakeholders to consider other approaches to the CEA to designate locations, including non-contiguous sites, for future federal facilities and uses that reflects the diverse missions of federal agencies, security, transportation, and the economic development considerations, existing development constraints, and goals of the District.

Action Item 2

Collaborate with federal, regional, and local jurisdictions to identify appropriate federal employment locations in the National Capital Region beyond the Central Employment Area.

Modification to Policy

Along with the changed previously discussed, staff revised policy FW.A.2 on page 11 for clarity purposes. The policy relates to the CEA.

2016 Policy (old)	2021 Policy (revised)
FW.A.2 Use the following priorities when locating federal workplaces: 1. In existing urban areas, give first consideration to the Central Employment Area within Washington, DC. The CEA should reflect the District of Columbia's priority areas for commercial or mixed-use development and transportation investment. The District of Columbia, NCPC, and other federal agencies should evaluate the CEA as needed, to ensure that it reflects current priorities. 2. Beyond the CEA, give first consideration to sites in proximity to	FW.A.2 Prioritize the location of federal workplaces within the designated Central Employment Area in Washington, DC. Beyond the CEA, consider other federal employment areas such as designated opportunity zones, other distressed areas, and areas in proximity to transit and identified by local jurisdictions as priority places for federal facilities. The District of Columbia, NCPC, and other federal agencies should evaluate the CEA, as needed, to ensure that it reflects current priorities.

transit and compatible with local planning efforts. In rare exceptions, agencies that have specific operational or land use requirements associated with their missions should locate where these needs can be fulfilled, only if such needs cannot be fulfilled in the CEA or other sites in proximity to transit and compatible with local planning efforts.	

Recommendation Summary

The Executive Director recommends that the Commission approve the amendments to the boundary, definition, and policy of the CEA in the 2016 Federal Workplace Element as highlighted in Appendix A. The revised CEA would take effect 60-days after the publication of Federal Register notice announcing the adoption of the revised 2016 Federal Workplace Element by the Commission.

In addition, the Executive Director recommends that the new action items be added to the Comprehensive Plan's 2016 Action Plan. The 2016 Action Plan contains specific projects to advance the Commission's vision and the necessary steps to activate the plan's goals and policies.

The Executive Director recommends deferring action on further changes to the Federal Workplace Element, while staff continues to study the potential long-term impacts to the planning, location, and design of federal workplaces post-COVID-19.

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

The updates to the Federal Elements of the Comprehensive Plan are provided in accordance with the provisions of the preparation and adoption of Federal Elements of the Comprehensive Plan specified at 40 U.S.C. § 8721.

National Historic Preservation Act

This proposal does not sustain characteristics as a federal undertaking. The proposal of policy revision does not implement, contract, or take other actions that would preclude consideration of the full range of alternatives to avoid or minimize harm to federal historic properties. Consequently, the proposed action does not require review pursuant to the National Historic Preservation Act, Section 106 process.

National Environmental Policy Act

Staff reviewed the proposal in accordance with NCPC's implementation of the National Environmental Policy Act and determined that the amendments to the Federal Elements can be categorically excluded from further environmental analysis and documentation. The action is determined by the staff to qualify as NCPC's Categorical Exclusion: (4) Adoption of a Federal Element of the Comprehensive Plan or amendment thereto or broad-based policy or feasibility plans prepared and adopted by the Commission in response to the Comprehensive Plan.

CONSULTATION

NCPC and DCOP staff worked together in consultation with the GSA and the Office of the Deputy Mayor for Planning and Economic Development to amend the Central Employment Area boundary.

ONLINE REFERENCE

The document will be available online following Commission action:
https://www.ncpc.gov/initiatives/workplace/

Appendices
Appendix A – Amendments to the 2016 Federal Workplace Element (final for adoption)
Appendix B – Compiled Comments Received
Appendix C – Existing Central Employment Area Boundaries

Prepared by Angela Dupont
02/25/2021

APPENDIX A

AMENDMENTS TO THE 2016 FEDERAL WORKPLACE ELEMENT

MARCH 4, 2021

Security

Security is an important consideration when deciding on the siting of a federal facility. Federal agencies that require greater setback requirements and security needs may decide to locate on federal campuses or areas located outside of Washington, DC. Federal campuses like St. Elizabeths, FDA White Oak, and the Suitland Federal Center are desirable locations for agencies that want to provide a security buffer for one larger area vs. providing perimeter security for individual buildings. The U.S. Department of Defense's Unified Facilities Criteria established minimum anti-terrorism and force protection standards for all U.S. Department of Defense buildings, which play's an important role in siting decisions.

Elvert Barnes

The Suitland Federal Center is a secure campus located just outside of Washington, DC in Suitland, MD.

Key Plans and Policies that Shape Federal Building Locations

The location of federal facilities plays a critical role in how federal employment is distributed in the region. One key challenge is retaining and attracting federal employment and activities in the nation's capital. Appropriately locating federal workplaces can encourage efficiencies in federal operations and promote development that can advance regional and local goals such as economic development, compact, mixed-use development, increased transit ridership, reduced road congestion, improved air and water quality, efficient use of existing infrastructure, and preservation of open spaces.

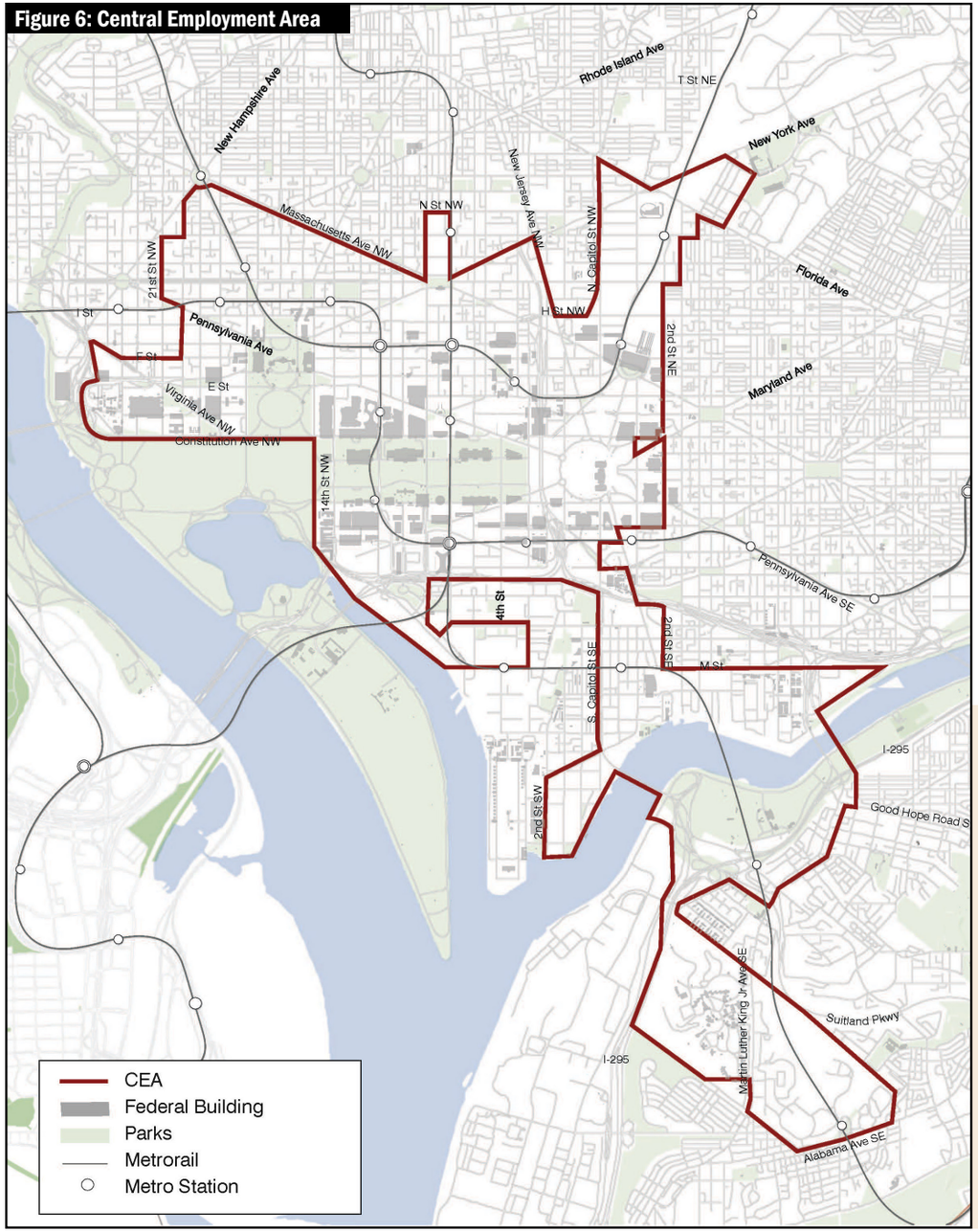
As the seat of the federal government, federal headquarters, major federal facilities, and buildings with symbolic functions should remain centralized in the Central Employment Area (CEA) of Washington. This area is highly accessible to the public, employees, and groups requiring consistent contact with these agencies, fostering efficient interactions among federal policy-making branches. When locating outside of the CEA, federal agencies should consider other federal employment areas identified by local jurisdictions as priority places for federal facilities; and areas where the region's jurisdictions have collectively identified for job and housing growth, such as the Regional Activity Centers.[18] Locating federal facilities in these planning areas can help support local economic development and planning goals and objectives.[19]

A wide range of plans and policies guide location decisions. The Federal Workplace Element focuses on planning priorities for agencies located within the NCR.

The Central Employment Area in the Comprehensive Plan for the National Capital

Since the 1969 Comprehensive Plan, NCPC has prioritized workplace locations within Washington's official CEA. The CEA reflects the region's primary commercial center and concentration of federal employment. The area incorporates the federal establishment's symbolic and physical heart and is the hub of various transit system. Most of the CEA's federal facilities are within a quarter mile of a Metrorail station and connected to the station by a network of walkable streets. GSA uses the CEA boundary as the primary area for federal leasing in Washington, DC.

Figure 6: Central Employment Area



NCPC

While the Comprehensive Plan defines the CEA, it does not include a specific process to review or update its boundaries. NCPC and the District of Columbia should periodically assess the CEA as a tool to support infrastructure needs and other reinvestment efforts. And as the District and Federal Elements are updated, the CEA should be reevaluated to ensure that it reflects the District of Columbia's priority areas for commercial, mixed-use development, and transportation investments.

As part of this update, NCPC and the District of Columbia worked together to include one joint update to the CEA boundary in both the Federal and District Elements.

Many federal facilities continue to be located within the CEA, while other federal activities that must be located outside it are situated in federal employment areas, where local land use conditions support the efficiency and productivity of those activities. With the changing needs of the federal workplace, many federal agencies may relocate to accommodate space needs and consolidation efforts.

When locating outside of the CEA, it is important to consider areas that help improve social, economic, environmental, and cultural conditions. And in urban areas, federal facilities should locate to the extent practicable in qualified opportunity zones, other distressed areas, and central business districts or employment areas that are recommended by local officials.[20] The federal government should continue to collaborate with federal, regional, and local jurisdictions to identify appropriate federal employment locations in the region beyond the CEA.

Central Employment Area

Both the District and Federal Elements include a joint federal/District designation of a Central Employment Area within Washington, DC. The CEA includes the existing "core" of federal facilities such as the U.S. Capitol Building, the White House, the Supreme Court, and most of the legislative, judicial, and executive administrative headquarters of the United States government. The Central Employment Area is the District of Columbia's commercial core where the greatest concentration of employment is encouraged.

GSA

Thomas P. O'Neil, Jr. Federal Building was modernized and renovated to serve as a modern office building for the U.S. Government. Completed in 2013, the building includes several features to promote water efficiency and reuse, resulting in a 45 percent reduction in water usage as compared to similar commercial building standards.

SECTION A: Policies Related to Locating Federal Workplaces

Where federal facilities locate can have major impacts on the agency mission, operations, and the surrounding community and region. Federal facilities can bring new employment and economic opportunities to local communities and can affect the local and regional transportation network. The policies within the Federal Workplace Element prioritize federal building locations with respect to key planning goals and priorities related to the environment, operations, and transportation.

The federal government should:

FW.A.1 Consider the modernization, repair, and rehabilitation of existing federally owned facilities for federal workplaces before developing new facilities.

FW.A.2 Prioritize the location of federal workplaces within the designated Central Employment Area in Washington, DC. Beyond the CEA, consider other federal employment areas such as designated opportunity zones, other distressed areas, and areas in proximity to transit and identified by local jurisdictions as priority places for federal facilities. The District of Columbia, NCPC, and other federal agencies should evaluate the CEA, as needed, to ensure that it reflects current priorities.

APPENDIX B
COMPILED COMMENTS RECEIVED

MARCH 4, 2021

FEDERAL WORKPLACE ELEMENT

(DRAFT RELEASE)

LIST OF COMMENTS RECEIVED

Notes on List of Comments:

- This document lists all comments received on the Draft 2019 Federal Workplace Element update during the public comment period.
- Comments are listed in the following order:
    - *Comments from Federal Agencies*
    - *Comments from Local and Regional Agencies*
    - *Comments from Interest Groups*
    - *Comments from Interested Individuals*

COMMENTS FROM FEDERAL AGENCIES

United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO:
10.D (NCA-LP)

September 23, 2019

Marcel Acosta
Executive Director
National Capital Planning Commission
401 9th Street, N.W., Suite 500
Washington, D.C. 20004

RE: Comments Draft Federal Workplace Element

Dear Mr. Acosta:

The National Park Service (NPS) has reviewed the draft Comprehensive Plan's Federal Workplace Element and offer the following comments. This particular element of the comprehensive plan is important to federal agencies as it establishes policies that emphasize Washington as the seat of the federal government; efficiently plan and locate federal workplaces to contribute to the National Capital Region's economic well-being; promote resource protection; and provide sustainable and healthy work environments for the federal workforce.

The guiding principles and policies within the draft Federal Workplace Element are aligned with what the NPS believes the federal agencies should be considering as agencies continue to maintain work forces in the District of Columbia. Two areas where the NPS would like to see developed more are Section A: Adapt to the Changing Needs of the Federal Workplace and Section B: Locate Federal Facilities Strategically. Both of these sections contain policies related to reuse of existing federal properties, specifically historic properties, using St. Elizabeth's redevelopment as an example. It is very important that when a federal agency is considering reuse or rehabilitation of historic structures or sites, the proposed use being considered be consistent with the historic character and significance of the site or building. The policies related to reuse should require that the adaptive reuse be accomplished with historic preservation as the primary goal so as to not destroy the integrity of heritage resources during the reuse. There is a policy for natural resource protection/preservation but not one that includes historic preservation. This comment would require changes to policies FW.A.2, FW.B.5, and FW.B.8 as well as maybe a few others.

One minor comment is related to the map on page 8 which refers to NPS property as NPS reservations. NPS only has reservations in DC, when referring to NPS areas throughout the region the map legend should be NPS properties.

The NPS appreciates the opportunity to review and comment on the Federal Workplace Element. For further coordination on this please contact Tammy Stidham, Deputy Associate Regional Director, Lands and Planning at (202) 619-7474 or tammy_stidham@nps.gov.

Sincerely,

Peter May
Associate Regional Director
Lands and Planning

COMMENTS FROM LOCAL AND REGIONAL AGENCIES

MURIEL BOWSER
MAYOR

August 6, 2019

Marcel Acosta
Executive Director
National Capital Planning Commission
401 9th Street, NW
Washington, DC 20004

Dear Mr. Acosta:

Thank you for offering the District of Columbia an opportunity to provide feedback on the federal Workplace Element of the Comprehensive Plan. I would like to commend NCPC on its work to update this document given the changing nature of the workplace. However, I am concerned that NCPC is proposing to remove the long-standing 60:40 policy. For more than fifty years, the 60:40 policy stood as the federal government's commitment to maintain the nation's capital as the epicenter of the federal government by retaining 60 percent of its National Capital Region workforce in Washington, DC.

I am pleased that your staff has worked with the DC Office of Planning to ensure that the proposed replacement policy retains a numerical goal and recognizes both the symbolic and operational importance of the District of Columbia to the federal government and its workforce. However, the proposed policy softens the federal government's commitment to the national capital, which has significant policy implications.

To be clear, retaining the current base of federal employment in the District is imperative for the health of our economy. Some have pointed out that our economic strategy is focused on expanding the private-sector's role in the District's economy. However, it is important to emphasize that strategy targets growth opportunities that extend from the District's economic base, which still centers on federal employment and procurement.

I also recognize that some of the decline in the District's federal employment comes from major facility realignments at places like Walter Reed Army Medical Center, the Southeast Federal Center, and St. Elizabeths. We anticipate continuing to partner with the federal government on the reuse of underutilized federal assets for publicly beneficial uses, such as the Armed Forces Retirement Home, and we believe this can happen without reducing federal employment in the District.

On a broader level, Washington, DC's economy has developed around the federal government for centuries and as a result, our economy is fundamentally interconnected with the federal government's operations. If the federal government were to withdraw significant portions of its operations from the District, it would hurt both the city's economy and the federal government's efficacy by dissolving a system of mutually reinforcing benefits that are not easily recreated.

Through this relationship, the District of Columbia has unique capacity to host the federal government based on its Constitutional status, established partnerships, and specialized facilities that have been constructed in alignment with supportive infrastructure. Furthermore, the District is the most efficient and accessible location within the region for most federal workplaces because our employment areas are served by unparalleled multi-modal transportation access including the core of the Metrorail system.

Further distribution of the National Capital Region's federal workplaces will impair the quality of the federal workforce by shrinking the pool of talented and experienced workers who can access decentralized locations. My concerns are deepened by the proposed amendment's analysis of federal leases in the region concluding that more than 40 percent of the federal government's leases in the District are up for renewal by 2033 and that many of those agencies may relocate to other jurisdictions. I want to ensure that the tens of thousands of District residents who are federal employees are not adversely impacted by workplace relocations. And I am most uneasy about relocations that that could make a workplace overly burdensome for currently employed District residents to access.

In my view, the proposed revision to the 60:40 policy is particularly significant because it coincides with national policy changes that are shrinking the federal workforce while spreading employees that work in agency headquarters operations across the country. I appreciate that many of the federal government's functions should be near the issues and people they serve. However, the current policy changes appear to run counter to arguments for government efficiency by seeking to relocate functions that are best suited for the federal government's National Capital Region operations.

Over the past year, there has been a rapid succession of announcements that DC-based operations at agencies including the FBI, USDA and Department of the Interior are slated for relocation to other regions of the county. Relocating headquarters units from the National Capital region weakens the federal government by removing them from the region's specialized labor market.

I urge the Commission to recommit to the District as the hub of the federal government's National Capital Region operations and reinforce the mutually beneficial interests of both the District and federal government. Moreover, the value of redevelopment or reduced operations costs for any single facility is not likely to be sufficient justification for relocation; the increased costs of competing for specialized workers in a smaller labor market along with the operational inefficiencies of a widely scattered workforce typically offset the short-term savings on facility costs.

I ask that NCPC reconsider this change and retain the 60:40 policy. I look forward to working with NCPC to help to ensure the nation's capital remains both the symbolic and operational center of the federal government.

Sincerely,

Muriel Bowser
Mayor

September 9, 2019

National Capital Planning Commission (NCPC)
401 9th Street, NW, Suite 500N
Washington, DC 20004

Re: Comments on the Federal Workplace Element of the Comprehensive Plan for the National Capital

The Washington Metropolitan Area Transit Authority (Metro) offers the following comments on the Draft Release of the Federal Workplace Element of the NCPC's Comprehensive Plan for the National Capital. Metro appreciates the opportunity to review the Draft Release of the Comprehensive Plan's Federal Workplace Element developed by the NCPC. If you have any questions or require clarification on any responses, please contact Allison Davis by email at adavis5@wmata.com or by phone at (202) 962-2056.

Federal Workplace Element and Metro

We commend the NCPC for drafting a plan that emphasizes the importance of locating federal agencies where transportation options are most available. As noted in the Draft Release, federal employees make up a significant portion of the region's workforce. As such, Metro appreciates the support of locating federal facilities near transit, which mitigates congestion, reduces energy use, and lowers greenhouse gas emissions. While it is most common to focus development around Metrorail stations, we note that Metrobus has a number of high-frequency, all day bus corridors that may present additional options for locating federal facilities.

Section B: Locate Federal Facilities Strategically

WMATA supports policies (FW.B Policies 1, 3, 4, 9, 10, 11, 14, 15, and 16) to ensure that Federal facilities are strategically located in areas that are well-connected to the larger region and served by multiple transportation alternatives. While Metro understands a range of issues must be considered when siting a Federal workplace, Metro is pleased the plan emphasizes the importance of utilizing existing resources when possible, including public transportation services.

Metro has the following comments related to specific policies described in Section B:

FW.B.3, page 27

We suggest adding "frequent bus" to the end of the first sentence, so that the policy reads: "Locate federal facilities within walking distance of existing or planned transit services, such as Metrorail, MARC, VRE, light rail, streetcar, bus rapid transit, and frequent bus." We suggest adding the term "frequent bus" because there are many bus routes in the region that operate every 15 minutes or better, carrying up to 11,750 passengers per weekday.

Washington Metropolitan Area Transit Authority

600 Fifth Street, NW
Washington, DC 20001
202/962-1234

By Metrorail:
Judiciary Square—Red Line
Gallery Place-Chinatown—Red, Green and Yellow Lines
By Metrobus:
Routes D1, D3, D6, P6, 70, 71, 80, X2

A District of Columbia, Maryland and Virginia Transit Partnership

These bus routes provide high-capacity, frequent service and due to their importance to the regional transportation network, frequent bus should be included in this list along with bus rapid transit.

Section C: Design Sustainable and Healthy Work Environments

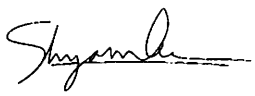
WMATA supports policies (Section FW.C Policies 2, 3, and 4) to ensure that the built environment around Federal workplaces facilitates walking, biking, and transit use.

Metro has the following comments related to specific policies described in Section C:

On Page 29, the document recommends "prioritizing parking locations for those who carpool, offering shuttles, subsidizing use of alternative forms of transportation, or permitting working remotely are other ways to incentivize employees to change travel behavior." While FW.C.11 states that the federal government should permit and encourage teleworking, Metro recommends including a policy tied to this recommendation, that the federal government should, "Encourage and subsidize the use of alternative forms of transportation."

Thank you again for the opportunity to comment on the draft Federal Workplace Element.

Best regards,



Shyam Kannan
Vice President
Office of Planning

COMMENTS FROM INTERESTS GROUPS

The Committee of 100
on the Federal City

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Stephen A. Hansen

Vice-Chair
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Nancy MacWood
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Elizabeth Purcell
Marilyn Simon
Jim Smailes
de Teel Patterson Tiller
Evelyn Wrin

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September 9, 2019

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National Capital Planning Commission (NCPC)
401 9th Street, NW, North Lobby, Suite 500
Washington, D.C. 20004
marcel.acosta@ncpc.gov

RE: Comments on the Proposed Revised Federal Workplace Element of the Federal Elements of the NCPC Comprehensive Plan

Dear Director Acosta:

Thank you for the opportunity to review and comment on the July 11, 2019, draft release proposal to revise the Federal Workplace Element of NCPC's Comprehensive Plan. Overall, the Committee of 100 on the Federal City views the exercise a laudable effort which clarifies and tightens an already strong document. We have only a few comments or suggestions.

Issue: Size and distribution of Federal work force (employees) in the Washington Metropolitan Area.

On page 3 of the current "Federal Workplace Element," the Plan established the "60-40% Policy" goal/ target regarding location of Federal workforce: 60 percent regional Federal Workforce located in Washington, D.C. – remaining 40% in suburban Virginia and Maryland. On page 4 of the proposed revision draft however, it is clear that that goal is currently not met (49% workforce in the City) and that the downward trend of City federal workforce will continue.

Whatever the likely causes, the Committee of 100 believes this to be a troubling trend given the city's role as national and world capital. The Committee recommends the draft significantly prioritize and rigorously and more strongly advocate retaining something akin to the 60-40% Policy within credible limits and suggest concrete steps to achieve that goal, e.g., increased building construction or leasing within Central Employment Area and other parts of the City. It is too important an issue not to provide more emphasis.

Issue: Locating Federal Facilities Within Walking Distance of Transit.

On page 27, the goal of locating federal facilities within walking distance of transit is laudatory (Policy FW.B.3), "Priority should be given to locations within walking distance of Metrorail." The definition of "walking distance" should probably be defined (a quarter mile or less perhaps?). The Committee might further suggest a map added to the report showing the Central Employment District (CED) of Washington with walking distance circles shown for all the Metrorail stations in or adjacent to the CED. This would help "drive home" the point.

Issue: Design Sustainability and Healthy Work Environment

"Section C: Design Sustainable and Healthy Work Environments" (pages 29-34) appears to be somewhat suburban locations oriented. We suggest adding an additional statement:

> "Planning for new federal facilities, including leased space, in the Central Employment District (CED) of Washington should have priority and consider how the overall environment can be enhanced. This would involve working with the District government, the different Business Improvement Districts (BIDs), community groups and area developers to improve the environmental and urban design sense of the overall area around the proposed federal facility or lease".

Following, improving certain areas in the CED of Washington in more of an overall sense of well-being and will also be important but this is only lightly noted in the draft, e.g., page 31 where a "Callout Box" notes that a plan has been outlined to improve the SW EcoDistrict. This might be explained in more detail. There are other sites in the CED where similar planning might be appropriate for existing federal buildings or planned federal new federal buildings. While it may not be appropriate to try to name such areas in a Comprehensive Plan Element, there should be some indication that such opportunities exist.

Conclusion: The proposed revision draft represents a tremendous amount of work and we congratulate NCPC. Thank you for considering these comments. If you or your staff have questions or would like further clarification, please contact Mr. John Fondersmith at this address. We hope they are useful.

Sincerely,

Stephen A. Hansen, Chair

cc: Andrew Trueblood, Director, D.C. Office of Planning andrew.trueblood@dc.gov
Thomas Luebke, Secretary, U.S. Commission of Fine Arts tluebke@cfa.gov
Michael Sherman, National Capital Planning Commission michael.sherman@ncpc.gov
Angela Dupont, National Capital Planning Commission angela.dupont@ncpc.gov

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September 16, 2019

VIA E-MAIL

Federal Workplace Element Update
National Capital Planning Commission
401 9th Street NW, Suite 500N
Washington, DC 20004
Attn: Angela Dupont

Re: Comments on NCPC Project #CP01G, NCPC's Federal Workplace Element Update, Central Employment Area – 11 Dupont Circle

Ladies and Gentlemen:

On behalf of The RMR Group LLC, ("RMR") a publicly-owned real estate company that manages several Real Estate Investment Trusts that collectively have a substantial ownership presence in Washington, DC and the surrounding region, we hereby submit these comments on the Central Employment Area ("CEA") in the pending draft Federal Workplace Element Update with respect to the property with an address of 11 Dupont Circle, NW (Square 136, Lot 35), which currently contains an approximately 123,000 square foot office building. RMR currently manages one of the largest portfolios of GSA-occupied office buildings and has a strong working relationship with the GSA and other federal office tenants.

In sum, RMR asks that the Commission expand the CEA boundary to include 11 Dupont Circle, which is immediately adjacent to but outside of the current boundary of the CEA as it currently exists. The modest expansion of the CEA to include 11 Dupont Circle would logically reflect federal planning interests, be consistent with the District of Columbia's zoning designation for the property, and advance the goals and objectives of the Federal Workplace Element.

Background

Attached as **Exhibit A** is an excerpt of the CEA with 11 Dupont Circle highlighted. The northwestern boundary of the CEA as currently drawn includes the office buildings that line the southern side of Dupont Circle. However, the current version of the CEA excludes 11 Dupont Circle, somewhat inexplicably leaving out of the CEA the only major office building fronting on the north side of Dupont Circle.

Comment

RMR's sole comment on the Federal Workplace Element is straightforward: the CEA should include 11 Dupont Circle, which contains a large commercial office building on a property contiguous to the CEA.

Justification for Including 11 Dupont Circle in the CEA

The property at 11 Dupont Circle should be included in the CEA for several reasons. First, 11 Dupont Circle falls within the definition of the CEA. The CEA is described in the draft Federal Workplace Element as "the region's primary commercial center and concentration of federal employment. The area incorporates the federal establishment's symbolic and physical heart, encompasses the hub of the Metrorail and Metrobus system. . . . Most of the CEA's federal facilities are within a quarter mile of a Metrorail station and connected to the station by a network of walkable streets." These characteristics describe 11 Dupont Circle, which is located fewer than 500 feet from the entrance to the Dupont Circle Metrorail station on the Red Line and which is served by multiple WMATA bus lines. The property's location is as central and walkable as the office buildings immediately across Dupont Circle from 11 Dupont Circle.

Expanding the CEA to include 11 Dupont Circle would not give rise to an endless expansion of the CEA. Rather, the logical boundary of the CEA would include 11 Dupont Circle as the northernmost point and go no further. Beyond 11 Dupont Circle to the north and west are chancery and other lower-rise commercial buildings that do not logically fit within the characteristic of the District's core or the definition of the CEA. *See* **Exhibit B**. 11 Dupont Circle, however, does fall within the definition of the CEA and its current exclusion is arbitrary given the definition of the CEA and the characteristics of the property.

Second, the District's zoning designation for 11 Dupont Circle reveals its outdated exclusion from the CEA. 11 Dupont Circle is currently within the MU-21 zone, which is the same designation as the office properties fronting on the south side of Dupont Circle. The zone boundaries more clearly depict the logical dividing line for the CEA as the buildings immediately north of 11 Dupont Circle are in the lower density MU-15 zone. *See* **Exhibit C**.

Third and finally, the inclusion of 11 Dupont Circle in the CEA advances several objectives of the draft Federal Workplace Element and is not inconsistent with any objectives in the draft Element. For instance, the property helps ensure adequate space is available to meet the long-term needs of the federal government (FW.A.15) and, as noted above, is located within walking distance of transit (FW.B.3, FW.B.4, FW.B.15). 11 Dupont Circle is also within the Dupont Circle Historic District, a stated goal of the Workplace Element (FW.B.5: "Use . . . properties located within historic districts, for new federal workplaces"). Similarly, the property is not a greenfield site and is in a location that encourages compact forms of growth to support transit ridership (FW.B.8 and FW.B.10). 11 Dupont Circle is integrated into its urban context and the siting of federal facilities there would permit walking and cycling (FW.C.1, FW.C.2, FW.C.3, and FW.C.4). It is also immediately across a significant federal urban park (FW.C.9 and FW.C.10).

Thank you and please do not hesitate to contact us if you have any questions.

Very truly yours,

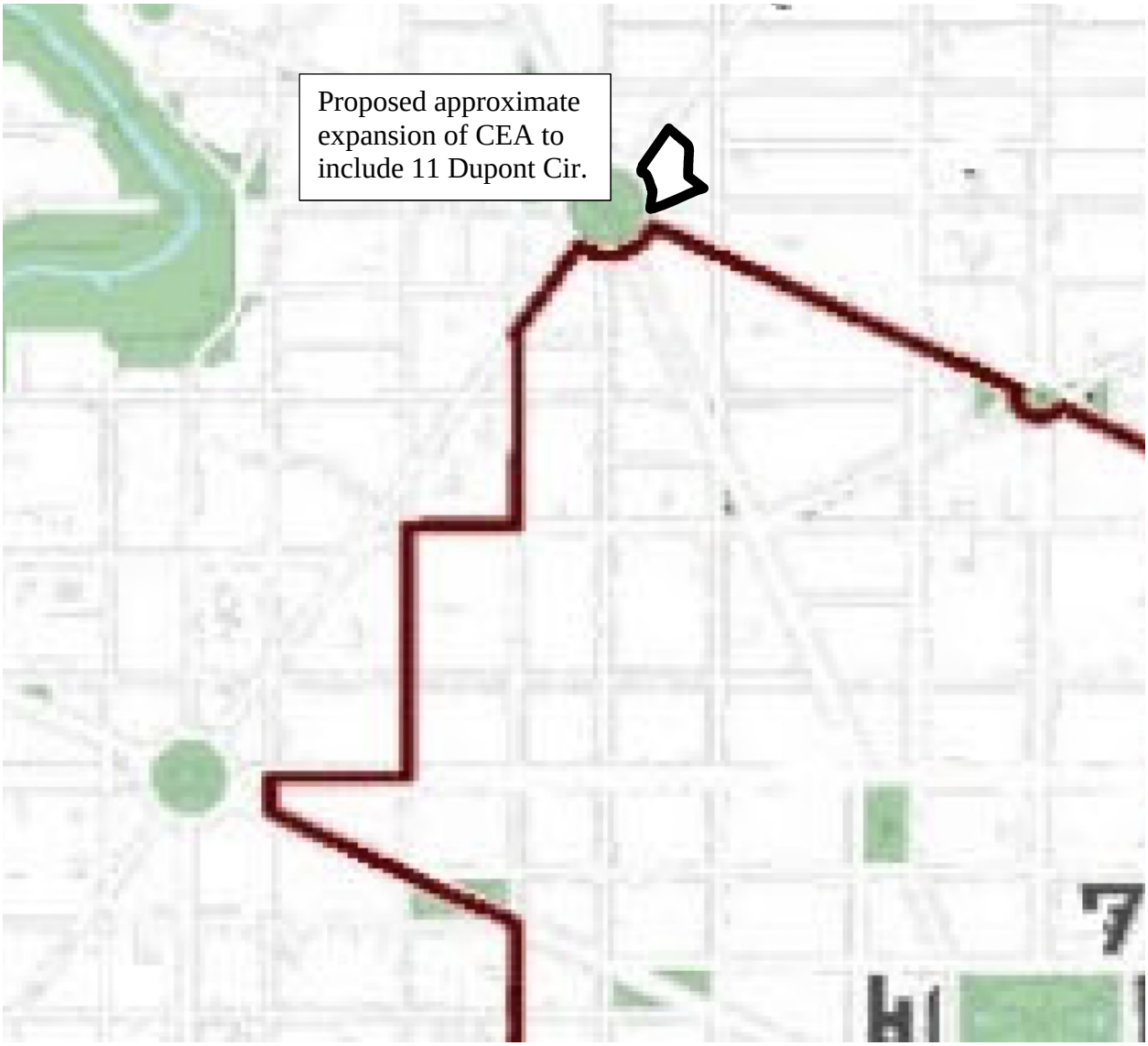
John T. Epting

David A. Lewis

Enclosures

cc: Jesse Abair, Esq. (*via e-mail only*)

EXHIBIT A



Excerpt from Federal Workplace Element (Draft Release, July 11, 2019) at 24 (CEA).

EXHIBIT B

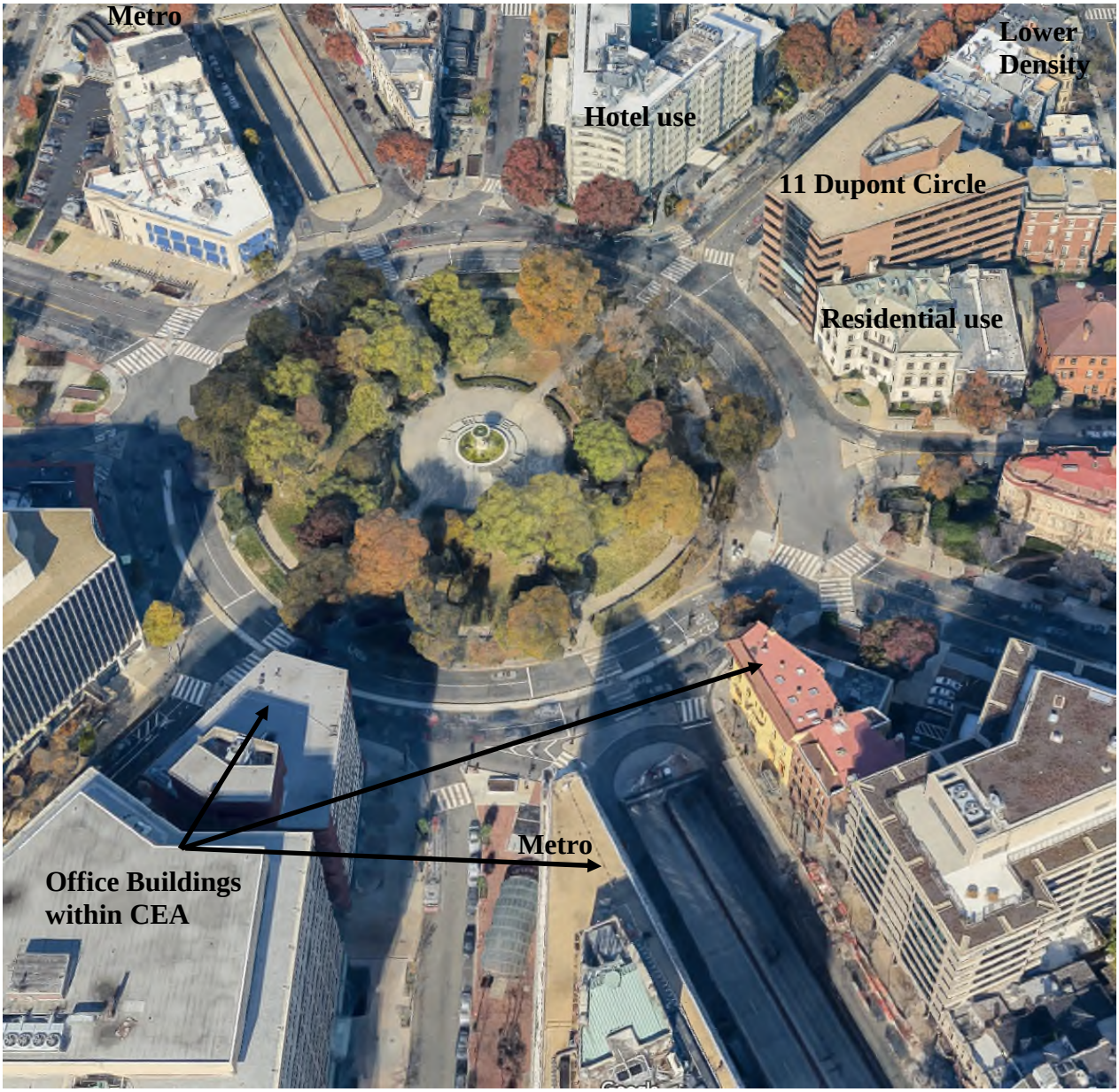

Metro
Lower Density
Hotel use
11 Dupont Circle
Residential use
Metro
Office Buildings within CEA

EXHIBIT C

Excerpt from District of Columbia Zoning Map.

City Interests LLC
2900 K Street NW, Suite 401
Washington, DC 20007

September 13, 2019

Federal Workplace Element Update
National Capital Planning Commission
401 9th Street NW, Suite 500N
Washington, DC 20004
Attn: Angela Dupont

Re: Comments on NCPC Project #CP01G, Federal Workplace Element Update

Ladies and Gentlemen:

City Interests, as the Master Developer of the Parkside PUD in Northeast, Washington, DC, strongly encourages the National Capital Planning Commission ("NCPC") to amend the boundary of the Central Employment Area ("CEA") depicted in the draft Federal Workplace Element to include Parkside in Northeast DC to be consistent with the CEA designated by the General Services Administration ("GSA"). The boundary of the area to be included on NCPC's CEA is shown on the attached Exhibit A, which is an excerpt from GSA's CEA map.

These comments provide background on Parkside and outline the multiple compelling reasons that NCPC should include Parkside in an updated CEA: (i) the Federal government should have just one, unified CEA for the District, utilizing GSA's CEA boundaries with respect to Parkside; (ii) Parkside is the type of mixed-use, transit-accessible urban area that NCPC's Federal Workplace Element otherwise encourages as an appropriate location for federal workers; and (iii) other Federal agencies have previously recognized Parkside's development potential, so Parkside's inclusion in the CEA promotes synergies with other Federal programs and priorities.

Background on Parkside

Parkside is a 3.1 million square foot mixed-use, transit-oriented development in Ward 7, Northeast Washington, DC. Parkside is located adjacent to the Minnesota Avenue Metro station on WMATA's Orange Line, and I-295/Kenilworth Avenue which sees over 120,000 cars per day pass by the site. At full buildout Parkside will include nearly 1 million square feet of office space, nearly 2,000 residential units, 50,000 square feet of community serving retail as well as other public benefits. With 700,000 square feet of the PUD delivered to date and another 300,000 square feet delivered in the immediate neighborhood, Parkside is an emerging development on the rise.

The existing development at Parkside includes 100 for-sale townhomes, an additional 120 for-sale townhomes plus 42 rental units developed by Enterprise Homes and the Pollin Foundation, a 98-

unit senior affordable multifamily building operated by Victory Housing, a 186-unit multifamily building, and a public park. In addition, Parkside includes a primary care clinic operated by Unity Health and four schools: an Educare Early Childhood Development Center for children aged 0-5 years old, the recently renovated DC Public School Neval Thomas Elementary, and a middle school and high school run by Cesar Chavez Public Charter Schools. See the attached Exhibit B for a summary of development at Parkside.

Within the next 12 months, City Interests will be breaking ground on three additional workforce and market-rate multifamily buildings totaling over 400 workforce housing units and nearly 16,000 sf of ground floor retail. In addition, a new iconic pedestrian bridge to be built by the DC Department of Transportation has been approved and funded by DC Council and City Interests. Construction on the pedestrian bridge has commenced and will result in a new bridge which will reduce the travel distance to Metro from an existing 1,300 feet to just over 500 feet.

NCPC Should Adopt GSA's CEA Map with respect to Parkside

This type of transit-oriented, mixed-use community is exactly why GSA added Parkside to its CEA in 2008 (with full support from the District of Columbia's Deputy Mayor for Planning and Economic Development), and why NCPC should do the same. Parkside has and will continue to compete for Federal agency office tenants, and in many cases GSA utilizes the CEA definition to delineate the area available for the tenant's relocation.

GSA's inclusion of Parkside on the GSA CEA acknowledges the long-standing inequity of Ward 7, a predominantly African-American community, being the only Ward in the District without a permanent Federal workplace installation. GSA's inclusion of Parkside makes Parkside a stronger candidate for the future location of a Federal office tenant, which provides attendant economic benefits to surrounding neighborhoods and businesses. NCPC should follow GSA's lead and revise its CEA to reflect the need to help begin to rectify historic inequities in neighborhoods east of the Anacostia River.

Parkside Advances the Policy Objectives of the Federal Workplace Element

Parkside should also be included within NCPC's CEA also because it advances numerous policies and objectives of NCPC's Federal Workplace Element. For instance, Parkside's access to transit and mixed-income, mixed-use development advance objectives in the Workplace Element related to location-efficiency, regional planning, and sustainability (FW.B.3, FW.B.4, FW.B.10 FW.B.15, and FW.C.4). The variety of housing options available at Parkside, both for sale and for rent and priced at affordable, workforce and market-rate levels, advances NCPC's objectives to locate federal workplaces in areas that provide a variety of housing options that are affordable for all federal employees (FW.B.7 and FW.B.14). In addition, Parkside is an area that the District has identified as important for future office growth, given the approval of the Planned Unit Development at Parkside (FW.B.11).

Parkside is located along the Anacostia Riverwalk Trail, a major, regional, off-street bicycle network, which allows convenient and healthy bicycle access (FW.C.1, FW.C.2, FW.C.3). Parkside is already designated as a LEED-ND neighborhood and the office buildings approved within Parkside will incorporate sustainability measures, such as solar panels (FW.C.5). Parkside is a complete, mixed-use neighborhood, with retail options, a local park and a regionally-significant park and outdoor areas (FW.C.9, FW.C.10, and FW.D.6).

Finally, the entirety of the Parkside development is located within an Opportunity Zone, a program whose main goal is to promote economic growth in disadvantaged communities, and will assist in fostering the growth of socially and economically disadvantaged businesses (FW.D.8 and FW.D.11).

Parkside Enjoys Special Recognition Under Other Federal Programs

Parkside's inclusion in the CEA creates synergistic value given its special status under other Federal programs. As noted above, Parkside is in an Opportunity Zone for Federal tax purposes. In addition, Parkside has also been identified by HUD as a CHOICE neighborhood and by the Department of Education as a Promise Neighborhood.

As a LEED-ND neighborhood, the largest private transit-oriented development east of the river in Washington, DC, and an emerging area of economic growth in a historically disadvantaged community, Parkside should be included in the CEA of NCPC's Federal Workplace Element to match its existing CEA designation by GSA. Thank you for your consideration of our request.

Sincerely,

Peter J. Farrell
Partner
City Interests LLC

Exhibit A
Excerpt from GSA CEA

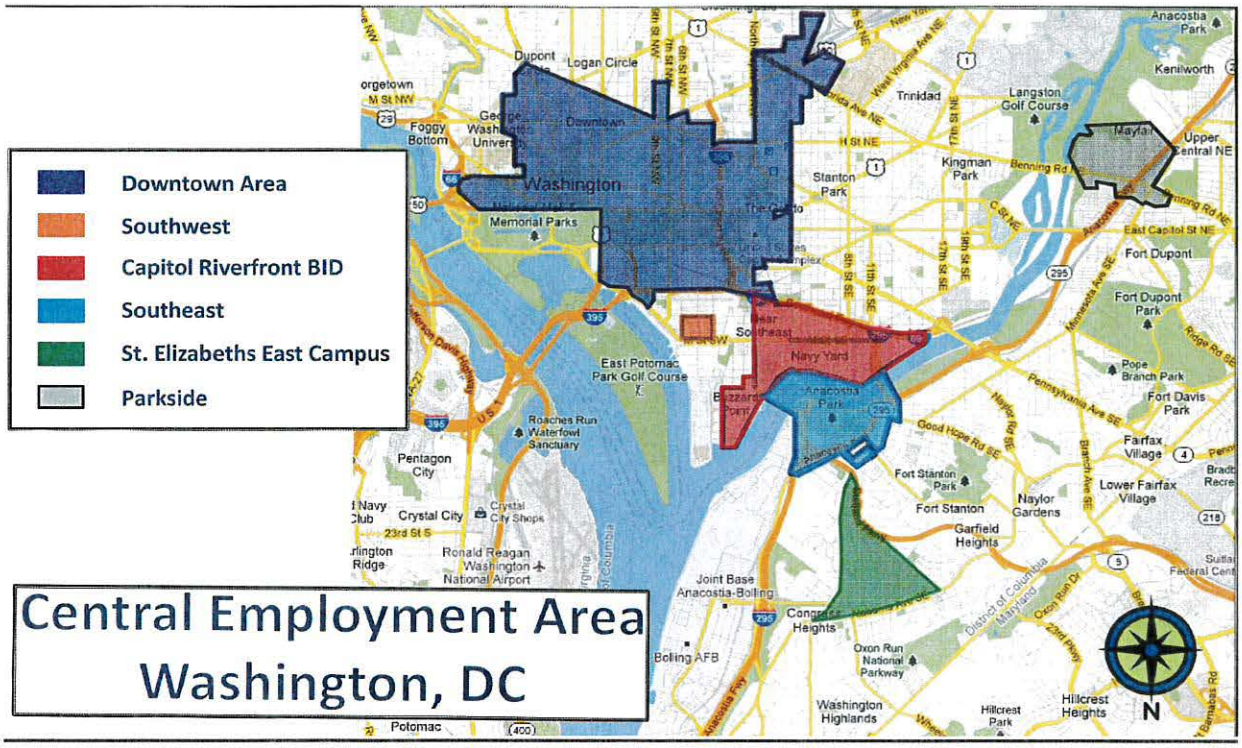


Exhibit B

Summary of Development at Parkside

From: CityInterests, LLC

PARKSIDE INVESTMENT OVERVIEW

Parkside is a 3.1 million square foot mixed-use, transit-oriented development in Northeast Washington, DC with 600,000 square feet delivered to date. In addition, another 300,000 square feet has been delivered in the immediate Parkside neighborhood. The entirety of the Parkside neighborhood is located within an Opportunity Zone, offering considerable tax benefits to investors of Qualified Opportunity Funds.

- PUD-approved with 5 stages of the project currently in receipt of Stage 2 PUD Approvals
- Located within 1/4 mile walk of the Minnesota Avenue Metro Station on the Orange Line in Washington, DC, along with excellent access to I-295/Kenilworth Avenue
- Significant opportunity for future development with more than 1,000 additional multifamily units projected to be delivered in stages at Parkside
- A shortage of quality housing exists for those renters with Workforce-level incomes (60-120% AMI), and Parkside is poised to capture those renters with its low land basis and attractive rent levels which provide a significant discount to other DC neighborhoods
- The next phase is Parcel 11, a fully entitled project with 100% construction documents and fully approved Building Permit ready to be pulled upon HUD finance closing
    - Accepted into HUD 221(d)(4) loan program with 40 year fixed rate loan/40 year amortization financing at attractive rates
    - HUD Firm Application submission in 2Q 2019 with Financing ready to close in 3Q 2019. Anticipated construction start in 3Q 2019
    - Attractive cash-on cash returns, IRR and Equity Multiple

PARKSIDE DEVELOPMENT SUMMARY

Our development plan for Parkside is based upon a fundamentally sound continuum that builds on the income levels and diversity of uses within the neighborhood and the changing demographics of Washington, DC.

This investment thesis is supported by Urban Land Institute (ULI) studies that can be found at the following links:

https://uli.org/wp-content/uploads/ULI-Documents/Priced-Out-DC-reduced.pdf

https://uli.org/wp-content/uploads/ULI-Documents/Preserving-Multifamily-Workforce-and-Affordable-Housing.pdf

The introduction of affordable senior housing at Parkside (Victory Square, 2012, 100% leased) was followed by the introduction of affordable multifamily (The Grove, 2016), affordable townhouses (MetroTowns at Parkside, 2014, 100% sold at 20% premium to original asking prices) and most recently workforce and market rate townhouses (Parkside Townhomes, 2016, fastest selling KHovnanian development in the Mid-Atlantic, 100 homes sold in +/-16 months at a premium to asking prices). Our strategy: to first satisfy the affordable housing component of our PUD -- 20% of the units within the PUD are already designated affordable -- and now to introduce workforce apartment units on Parcel 11 followed by workforce and market rate apartment and condominium units on Parcels 8, 9 and 10, is both strategic and market driven. Parcel 11 is anticipated to close and start construction in 2019 with delivery in 1Q 2021. Further, through the diversification of asset types such as office, educational, health care, hospitality and retail we are able to optimize absorption and create a community built upon sustainable real estate fundamentals.

Also noteworthy is Parkside's draw of three of the leading DC office developers to invite City Interests to discussions about Joint Venture Partnerships on upcoming GSA space solicitations. Located in the Central Employment Area, Parkside is one of the very few transit-oriented development sites that meets the design, FAR (up to 1,000,000 SF), entitlement, and lowest site cost requirements that will be used in at least half a dozen GSA solicitations to be awarded in the next three years.

The political view surrounding Parkside is also important to consider. The City views Parkside as a model for New Community Development and Parkside has received real estate tax abatement on several parcels, with a strong likelihood to receive the same treatment for future developments. In addition, the dearth of housing aimed at workforce income-level renters makes Parkside an attractive community due to the lower land basis and more affordable rents. Quality housing options that are affordable to those with incomes in the 60-120% AMI level are dwindling, particularly within Washington, DC and readily accessible to local employment centers. Meanwhile more than 35% of the DC Metro Area households fall within this income bracket. Parkside is uniquely positioned to execute on our plan of creating housing for a diverse group of income levels.

PARKSIDE PUD HISTORY

Parkside initial Stage I PUD approval highlights

- Between 1,500 – 2,000 residential units
- Up to 50,000 sf retail space
- Up to 750,000 sf commercial space
- Pedestrian Bridge: CI has contributed $3 million toward the cost of the bridge
- One-acre community park
- At least 20% of all residential units to be affordable (60% AMI rental, 80% AMI for-sale)
- At least 20% of all residential units to be workforce (80-120% AMI)
- 2,000 parking spaces
- 45' wide permanent access easement to DDOT for purposes of maintaining and operating the Pedestrian Bridge

Parkside PUD Applications

05-28, 2006: Stage 1 PUD – entire 15.5 acres

05-28A, 2008: Stage 2 PUD – 98-unit senior affordable building (Victory Square) + 112 workforce and market rate townhomes (Parkside Townhomes)

05-28B, 2011: Stage 2 PUD – 43,000 SF primary care clinic (Unity Health Care)

05-28C, 2011: Stage 2 PUD – 270,000 SF higher education institution

05-28D, 2010: Stage 1 Extension Request 2010

05-28E, 2011: Stage 1 Modifications to Parcel 12

05-28F, 2011: Stage 2 PUD – Park

05-28G, 2011: Stage 2 PUD – Townhomes modifications

05-28H, 2011: Stage 1 Extension Request 2011

05-28I, 2011: Stage 2 PUD – Health clinic modifications

05-28J, K, 2013: Stage 2 PUD – 186-unit affordable apartment building

05-28L, 2013: Stage 1 Extension Request 2013

05-28O, 2015: Stage 1 Extension Request 2015

05-28P, 2016: Stage 2 – Parcel 11, 191 multifamily building

05-28Q, 2017: Stage 2 – Parcel 9 office, retail and multifamily

05-28R/S, 2017: Stage 2 – Parcels 8 and 10 townhomes, multifamily and retail

05-28T, 2017: Stage 2 – Parcel 12-H office, retail

05-28U, 2017: Stage 1 Extension Request 2017

ACQUISITION AND DEVELOPMENT TIMELINE

Acquisition of Parkside, 2004

Victory Square, delivered in 2012

- 98-unit, Affordable senior housing facility, 100% leased
- Waiting list of 600 seniors
- CityInterests collaborated with Banc of America Community Development Corporation and Victory Housing in the predevelopment stages of the project

Educare of Washington DC, delivered in 2012

- 31,000 SF state-of-the-art early childhood learning center
- CityInterests played a key role in attracting Educare to the site and developing the center on their behalf

Parkside-Unity Health Care Clinic, delivered in 2013

- 43,000 SF primary care clinic developed by the DC Primary Care Association
- CityInterests engaged DCPCA in the land sale and played an important role in the entitlements and predevelopment stages of the project.
- Clinic serves more than 50,000 patients from across the District annually

Parkside Community Park, delivered in 2014

- One-acre community park in the heart of Parkside
- CityInterests served as master developer, drawing financial assistance from the District Department of the Environment, EPA, and Commission on the Arts and Humanities
- The park retains and treats approximately 50,000 gallons of stormwater annually
- Winner of the 2015 Best Urban BPM in the Bay Award (BUBBA) from the Chesapeake Stormwater Network

The Grove at Parkside, delivered in 2016

- 186-unit affordable multifamily project
- Co-developed by CityInterests and Gilbane Development Company
- 10-year full tax abatement awarded
- Project was awarded $11 MM in gap financing from DHCD Housing Preservation Trust Fund (HPTF)

Parkside Townhomes, Phase 1 delivered in 2016, Phase 2 delivered 2017

- Phase 1 contains 39 townhomes; Phase 2 contains 61 townhomes; 100 total
- CityInterests drew K Hovnanian Homebuilders to develop the homes
- 100 townhomes have all been sold to date at prices ranging from $370,000-$461,000; fastest selling K Hovnanian development in the Mid-Atlantic

Parkside Pedestrian Bridge, construction to start 2Q 2019

- Spans from Parkside Parcel 12 to the Minnesota Avenue Metro and Bus Station, approximately 500 feet in length.
- To be constructed by DDOT, Total Development Cost $22 MM
- CityInterests and its existing partner, the Banc of America CDC, have contributed $3MM toward the cost of constructing the bridge

Parkside Parcel 11, construction to start in 2019 (see rendering below)

- 191-unit workforce multifamily project serving households 80-120% AMI
- CI will be submitting a firm application to participate in the HUD 221(d)(4) financing program in 2Q 2019
- 30-year real estate tax abatement approved by DC Council in May 2018, an extension of a 10 year real estate tax abatement

Parkside Parcel 9, construction to start 2020 (see rendering below of Parcels 8, 9 and 10)

- Parcel 9 is planned to contain 16,704SF ground floor retail space, 112,595 SF office space, and approximately 76 condominium units

Parkside Parcels 8 and 10, Phase I construction started in 2018

- Phase I to consist of 25 townhome lots to be developed by the Knutson Companies out of Virginia, which began in 4Q 2018
- On Parcels 8 and 10 CI is pursuing a joint venture with an opportunity zone fund that is dedicated to workforce housing. Pre-Development on the project, which includes 230 multifamily units and approximately 15,0000 SF of retail, has started and it is anticipated that both projects will be begin construction in mid 2020.

Parkside Parcel 12-I

- Parcel 12-I is an opportunity for a boutique office building or potentially a limited-service or extended stay hotel concept with significant frontage and excellent visibility along I-295/Kenilworth Avenue.

Parkside Parcel 12-G

- 600+ multifamily units are part of additional multifamily pipeline at Parkside

Parkside Parcel 12-H

- 503,019 SF of office has Stage II PUD approval for pursuit of GSA tenant.
- Additional FAR on Parcel 12-H, approximately 500,000 SF, is contemplated as office but can be converted to residential based on the PUD.

Other projects, participations, awards:

DC Promise Neighborhood Initiative (DCPNI); www.dcpni.org

- Together with America's Promise Alliance and Cesar Chavez Charter Schools, CityInterests was a founding partner of the first District of Columbia Promise Neighborhood
- DCPNI was awarded $28 MM implementation grant from the US Department of Education to support programs in the Parkside-Kenilworth community
- Approximately 40 full time employees and 30+ program partners
- DCPNI is one of the top performing promise neighborhoods in America

MetroTowns at Parkside, delivered 2015

- 83 for-sale townhomes and 42 rental public housing units developed by Pollin, Enterprise Communities, and DCHA
- Home prices range $275,000 - $350,000
- All homes sold at +/- 20% premium to initial pricing
- CityInterests played an important role in bringing Enterprise to Parkside

Neval Thomas Elementary School

- CityInterests was instrumental in advancing the City's renovation of Neval Thomas by 10 years.

Cesar Chavez Charter School at Parkside

- Immediately upon the acquisition of Parkside in 2004, CityInterests arranged for the construction of Cesar Chavez Middle and High School by Building Hope

Central Employment Area

- Parkside's designation within the Central Employment Area makes it eligible to participate in space solicitations from GSA

LEED for Neighborhood Development (ND)

- In 2012 Parkside was certified a LEED ND Gold Community

September 16, 2019

Federal Workplace Element Update
National Capital Planning Commission
401 9th Street NW, Suite 500N
Washington, DC 20004
Attn: Angela Dupont

***Re*: Comments on NCPC Project #CP01G, Federal Workplace Element Update – Inclusion St. Elizabeths East Campus in Central Employment Area**

Members of the Commission:

Redbrick LMD ("**Redbrick**") strongly encourages the National Capital Planning Commission ("**NCPC**") to adjust the boundary of the Central Employment Area ("**CEA**") depicted in the draft Federal Workplace Element to include the St. Elizabeths East Campus, which has been included in the CEA map of the General Services Administration ("**GSA**") since 2012. The boundary of the property requested for inclusion in NCPC's CEA is shown on the attached Exhibit A (the "**Property**"). The Property is an ideal candidate for inclusion in the NCPC CEA due to its proximity to and accessibility by transit, re-use of historic buildings, and opportunity for development and positive economic impact. Redbrick encourages NCPC to include the Property in the CEA to serve several policy goals of the Federal Workplace Element.

These comments provide history and planned development information for the Property and outline the multiple compelling reasons that NCPC should include the Property in an updated CEA: (i) the Property has an ideal transit-oriented location and provides a robust and expansive opportunity for economic development to an historically opportunity-disadvantaged area; (ii) the Property would provide the type of historically-sensitive, environmentally-sensitive, transit-accessible urban area that NCPC's Federal Workplace Element encourages as an appropriate location for federal workers; (iii) the Property is already included in GSA's CEA boundaries and including the Property in the NCPC CEA would allow for an opportunity to bring the various CEA maps into alignment; (iv) Redbrick will also be advocating for the Property's inclusion in the GSA and District CEA maps for consistency.

Description of the Property and Future Development

Dating to the mid-19th century, St. Elizabeths was the first federally-operated psychiatric hospital in the United States. The Property is the East Campus of St. Elizabeths, a 180-acre campus in Ward

8 adjacent to the Congress Heights Metrorail station. The Property is bounded by Martin Luther King Jr. Avenue SE on the west, Suitland Parkway SE on the north, Hebrew Cemetery on the east, and Alabama Avenue SE on the south. The Property includes multiple historic buildings.

The Property has been slated for redevelopment and the District issued a Master Plan and Design Guidelines in 2012 that was developed in accordance with multiple District agencies and the community (the "**Master Plan**"). The Master Plan calls for development of the Property with a robust mix of uses, including housing, both affordable and market rate, office, retail, and cultural uses. The Master Plan and District development also includes significant infrastructure improvements, making the Property ideal for redevelopment. Finally, the Master Plan requires coordination with the District Historic Preservation Office and the retention of many historic buildings on the Property. The degree of the opportunity at the Property is enormous and all of the conditions have lined up to allow for it to be a particularly unique transformative and catalytic investment in a long overlooked part of the City. Such opportunity would only be enhanced by inclusion in the NCPCs CEA.

While the Property includes substantial development over time, in the near term the portions of the Property closest to the Congress Heights Metrorail station are expected to be developed with a significant mix of office, retail, and residential uses. Parcel 15, immediately west of the Metrorail station, includes plans for 567,000 square feet of mixed-use development, including two residential buildings (with over 150 affordable residential units), a 200,000 square foot office building, a hotel, and ground-floor retail. There are additional projects planned for the near term including single-family residential homes (Parcels 10 and 14) and more office buildings and additional ground-floor retail (Parcel 17). These projects are examples of the near-term development at the Property.

Redbrick is a developer and owner of portions of the Property, including Parcels 10, 11, 14, 15, and 17, and is working with the District to advance these projects in the near term. Given the "early inning" redevelopment of the St. Elizabeths East campus, the Property is ripe for designation in the CEA.

NCPC Should Expand the CEA to the Property

The current NCPC CEA boundary ends northwest of the Property, including the area around the Anacostia Metrorail station. However, the Property is adjacent to the adjacent Metrorail station on the Green Line, Congress Heights. GSA currently includes the Property in its CEA because part of its planned development in the Master Plan includes significant office development. Further, its adjacency to the new Department of Homeland Security headquarters on the St. Elizabeths West campus provides a unique opportunity to locate federal offices near each other and benefit from adjacency. Expanding the CEA to a nearby transit-oriented area that meets the goals of the Federal Workplace Element will allow for more diversity and leverage in exploring options for future placement of the Federal workforce.

Further, the existing CEA does not include much property east of the Anacostia River, and expanding the existing CEA to adjacent areas in Ward 8 would improve economic opportunity in this underserved and underinvested area of the City. Inclusion in the CEA would make the Property a stronger candidate for the future location of a Federal office tenant, which provides attendant economic benefits to surrounding neighborhoods and businesses. Since the Property is an Opportunity Zone (Census Tract 010400), inclusion of the Property would be consistent with the Executive Order on Establishing the White House Opportunity and Revitalization Council issued on December 12, 2018.

The Inclusion of the Property Advances the Policy Objectives of the Federal Workplace Element

The Property should be included within the CEA also because it advances numerous policies and objectives of NCPC's Federal Workplace Element.

The Property's inclusion in the CEA would further many transportation goals of the Element. The Property is located immediately adjacent to the Congress Heights Metrorail Station, providing key public transit access. (FW.B.3., FW.B.4, FW.C.4.) The Property is also located near the Suitland Parkway Trail and numerous Capital Bikeshare stations, providing opportunities for employees to cycle to and from work (FW.C.1, FW.C.2, FW.C.3).

The Property provides the ideal mixed-use environment based on the Master Plan which will promote housing, including both market-rate and affordable housing, and retail in close proximity to the office uses. (FW.B.4, FW.B.7, FW.B.9). The Property's location next to the St. Elizabeths West Campus also provides the opportunity to have federal office space near another agency. (FW.B.6).

The Property's inclusion in the CEA would also promote the environmental goals of the Element. The Property contains a great deal of open space and is adjacent to park areas, which provide significant green space and outdoor opportunities. (FW.C.9, FW.C.10.)

Finally, the Property's inclusion in the CEA would also promote the historic and inclusive goals of the Element. The Property includes several historic buildings that will be adaptively re-used or maintained as part of the Master Plan. (FW.B.5.) The Property is also located in Ward 8, and inclusion of the Property in the CEA would promote economic growth in a disadvantaged community and assist in fostering the growth of socially and economically disadvantaged businesses (FW B.12, FW.D.8, FW.D.11).

Inclusion of Property in All CEA Maps

As described above, as a transit-oriented property near the existing CEA, providing opportunities for historically-contextual and environmentally-sustainable office development that also provides opportunities for economic growth in an historically-disadvantaged community, the Property

should be included in the CEA of NCPC's Federal Workplace Element. Perhaps most importantly, a unified CEA map would allow for ideal planning guidance for all stakeholders, agencies, and the community.

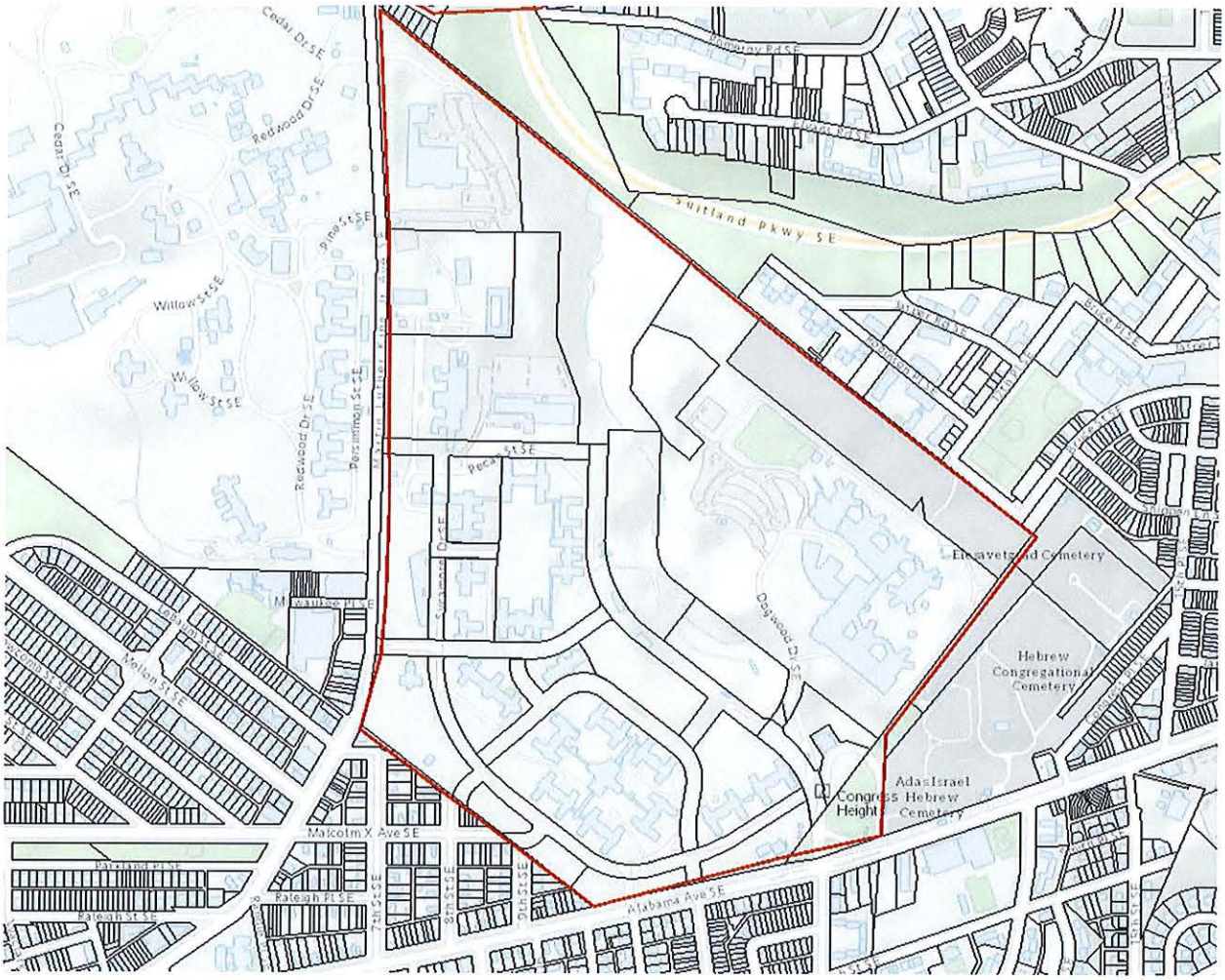
Redbrick appreciates this opportunity to comment on the NCPC's amendment process and looks forward to continuing its involvement.

Thank you for your consideration of our request.

Sincerely,

Thomas Skinner
Managing Partner

Exhibit A
Property for CEA Inclusion



September 16, 2019

Federal Workplace Element Update
National Capital Planning Commission
401 9th Street NW, Suite 500N
Washington, DC 20004
Attn: Angela Dupont

***Re*: Comments on NCPC Project #CP01G, Federal Workplace Element Update – Inclusion of Poplar Point and property along Howard Road SE**

Members of the Commission:

Redbrick LMD ("**Redbrick**") strongly encourages the National Capital Planning Commission ("**NCPC**") to keep property located adjacent to the Anacostia River between the new Frederick Douglass Memorial Bridge and the Anacostia Metrorail station in the Central Employment Area ("**CEA**") depicted in the draft Federal Workplace Element. This property includes private property abutting Howard Road SE and the entirety of Poplar Point, which is owned by the United States government and planned for redevelopment according to federal law. The boundary of the property to continue to be included in NCPC's CEA is shown on the attached Exhibit A (the "**Property**"). The Property is currently included in both the District of Columbia's CEA in the Comprehensive Plan and in GSA's CEA in addition to NCPC's CEA. Redbrick encourages the development of a consistent CEA among NCPC, GSA, and the District, and believes inclusion of the Property continues to serve several policy goals of the Federal Workplace Element.

These comments provide context on the Property and outline the multiple compelling reasons that NCPC should continue to include the Property in an updated CEA: (i) the Property is already included in NCPC, GSA, and the District's CEA boundaries; (ii) the Property provides the type of environmentally-sensitive, transit-accessible urban area that NCPC's Federal Workplace Element encourages as an appropriate location for federal workers; (iii) the Property provides a robust and expansive opportunity for economic development to a historically opportunity-disadvantaged area; and (iv) continued inclusion of the Property will promote a uniform CEA across NCPC, GSA, and the District.

Description of the Property and Future Development

The Property consists of the land east of South Capitol Street and west of I-295 adjacent to the Anacostia Metrorail station. The Property includes privately owned property along Howard Road

SE, District government owned property immediately adjacent to the Metrorail station, and Poplar Point, an approximately 110-acre federal government property poised for redevelopment. The Property provides a unique opportunity for future use given its proximity to the Anacostia Metrorail station, the new Frederick Douglass Memorial Bridge, Poplar Point, and South Capitol Street's bicycle facilities.

A substantial portion of the private property has recently been rezoned by the Zoning Commission to the Northern Howard Road (NHR-1) Zone. In this Zone, development could include buildings 130 feet in height with a 9.0 Floor Area Ratio ("**FAR**"), allowing for over three million square feet of development. The Zone requires mandatory residential FAR of at least 2.5, or over 870,000 square feet of residential development. The Zone also requires ground-floor preferred uses, including retail. Redbrick owns a substantial portion of this private property and intends to develop it with a mix residential, office, and retail uses, largely focused on office use, immediately adjacent to the Anacostia Metrorail Station.

Poplar Point is subject to federal legislation to transfer the property to the District for development. While the District and the federal government are still considering the best approach for development, it is expected that Poplar Point would be developed with a mix of uses, including a substantial component of affordable housing, and a significant portion would be maintained as park property to keep the Property's natural beauty.

NCPC Should Keep the Property in the CEA

All current CEA maps include the Property due to its proximity to transit, opportunity for development for federal office users, and rich natural beauty. The Property provides the ideal opportunity to develop custom-designed offices for the federal workforce. Its immediate adjacency to the Anacostia Metrorail station and the Anacostia River provides both unmatched environmental benefits and access and along with close proximity to transit, dual characteristics hard to come by in the nation's capital.

Further, inclusion in the CEA makes the Property a stronger candidate for the future location of a Federal office tenant, which provides attendant economic benefits to surrounding neighborhoods and businesses. Since the Property is an Opportunity Zone (Census Tract 007401), inclusion of the Property would be consistent with the Executive Order on Establishing the White House Opportunity and Revitalization Council issued on December 12, 2018.

Redbrick is a developer of most of the private land in the Property and expects the first redevelopment at the Property could come as early as next year, so the Property is ripe for designation in the CEA.

Since the Property provides such a unique opportunity in an underserved, underinvested area of the District, Redbrick urges NCPC to continue including the Property in the CEA. Further, Redbrick believes that maintaining the Property in the NCPC's CEA will allow for the GSA and

the District to continue to include the Property in their CEA maps, therefore providing the opportunity to create a uniform CEA.

The Inclusion of the Property Advances the Policy Objectives of the Federal Workplace Element

The Property should also continue to be included within the CEA because it advances numerous policies and objectives of NCPC's Federal Workplace Element. The Property's location is ideal for inclusion in the CEA. For instance, the Property would keep some of the CEA area in the District on currently federally-owned land, as portions of the Property are owned by the federal government. (FW.A.1, FW.A.3, FW.A.8, FW.B.6.) The Property's location next to the Anacostia River also provides viewpoint connections to downtown and the National monuments. (FW.B.2.)

The Property's inclusion in the CEA would further many transportation goals of the Element. The Property is located immediately adjacent to the Anacostia Metrorail Station, providing key public transit access. (FW.B.3., FW.B.4, FW.C.4.) The Property is also located adjacent to the new Frederick Douglass Memorial Bridge, which is under construction and will be completed in 2021. The new bridge design and other future development plans contemplate this area becoming a major regional bicycle network, which allows convenient and healthy bicycle access (FW.C.1, FW.C.2, FW.C.3).

The Property's location next to the Joint Base Anacostia-Bolling and close to the Homeland Security Headquarters and Coastguard Headquarters also provides the opportunity to have federal uses and office space located in an adjacent and beneficial manner. (FW.B.6).

The Property's continued inclusion in the CEA would also promote the environmental goals of the Element. The Property is located adjacent to the Anacostia River and includes significant green space, which provides enhanced outdoor opportunities for employees. (FW.C.9, FW.C.10.) As part of the planned development of portions of the Property, park space is also planned to be maintained to a meaningful degree.

Finally, the Property is located in Ward 8, and inclusion of the Property in the CEA would promote economic growth in a disadvantaged community and assist in fostering the growth of socially and economically disadvantaged businesses (FW B.12, FW.D.8, FW.D.11).

Uniform CEA Maps

As described above, as a transit-oriented property already included in the existing CEA, rich in natural beauty and providing opportunities for environmentally-sustainable office development that also provides economic growth in a historically-disadvantaged community, the Property should continue to be included in the CEA of NCPC's Federal Workplace Element. Continued inclusion of the Property, which is already included in all three CEA maps, helps create a unified

CEA map which would allow for ideal planning guidance for all stakeholders, agencies, and the community.

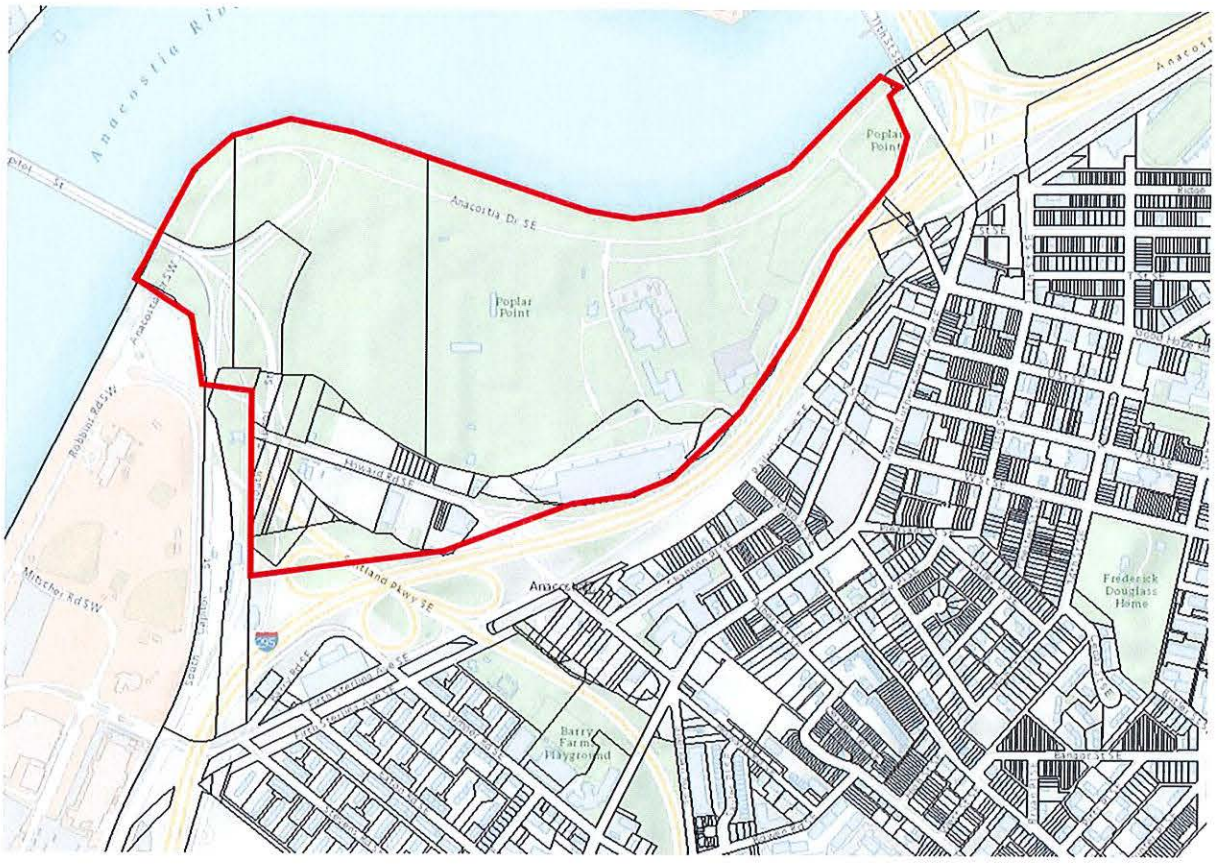
Redbrick appreciates this opportunity to comment on the NCPC's amendment process and looks forward to continuing its involvement.

Thank you for your consideration of our request.

Sincerely,

Thomas Skinner
Managing Partner

Exhibit A
Property for CEA Inclusion



AKRIDGE
Invested.

601 Thirteenth Street, NW, Suite 300 North, Washington, DC 20005
T 202.638.3000 Akridge.com

September 16, 2019

Federal Workplace Element Update
National Capital Planning Commission
401 9th Street NW, Suite 500N
Washington, DC 20004
Attn: Angela Dupont

***Re*: Comments on NCPC Project #CP01G, Federal Workplace Element Update – Inclusion of Capitol Riverfront in Central Employment Area**

Members of the Commission:

Akridge strongly encourages the National Capital Planning Commission ("**NCPC**") to adjust the boundary of the Central Employment Area ("**CEA**") depicted in the draft Federal Workplace Element to include the full Capitol Riverfront, which is currently included in the GSA CEA and the District of Columbia's CEA in the Comprehensive Plan. The boundary of the property to continue to be included in NCPC's CEA is shown on the attached Exhibit A (the "**Property**"). Akridge owns some of the Property and has been part of the Capitol Riverfront for several years. The Property is currently included in the District's and GSA's CEA due to its rapidly expanding development, mixed-use environment, and proximity to transit. Akridge encourages NCPC to include the Property in the CEA to serve several policy goals of the Federal Workplace Element.

These comments provide context for the Property and outline the multiple compelling reasons that NCPC should include the Property in an updated CEA: (i) the Property is already included in the District's and GSA's CEA boundaries due to its mixed-use, growing development; (ii) the Property would provide the type of mixed-use, transit-accessible urban area that NCPC's Federal Workplace Element encourages as an appropriate location for federal workers; and (iii) Akridge will also be advocating for the Property's continued inclusion in the GSA and District CEA maps.

Description of the Property

The Property is a portion of the Capitol Riverfront Business Improvement District, which is the District's fastest growing neighborhood. While a significant portion of the Capitol Riverfront is already included in the proposed CEA, the Property is not included in NCPC's CEA. However, due to its mixed-use, transit-oriented environment, the Property is included in the District's and GSA's CEA boundaries. The Property is bounded by 2nd Street SW on the west, Potomac Avenue SW on the north, South Capitol Street on the east, and the Anacostia River on the south.

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The Property includes several mixed-use projects providing retail, housing, and affordable housing all in a concentrated area where office use can be located. Further, the Property is well served by the Metrorail with the Navy Yard and Waterfront Metrorail stations just to the north of the Property. The Property also includes Audi Field, the home of DC United, and is adjacent to Nationals Park, the home of the Washington Nationals. Therefore, the Property provides a unique opportunity to create a federal workplace served by culture, nature, amenities, and housing in the immediate area.

NCPC Should Expand the CEA to the Property

The current CEA boundary ends east of the Property, adjacent to the overall Capitol Riverfront area. In fact, some of the general Capitol Riverfront area is included in NCPC's CEA. However, the Property is not included in NCPC's current CEA. This adjacent area is undergoing a significant amount of development and will include many mixed-use projects providing housing and retail uses to support office uses. Further, the Property's transit resources and adjacency to the Anacostia River make it an ideal location for the federal workforce.

Inclusion in the CEA would make the Property a stronger candidate for the future location of a Federal office tenant, which provides attendant economic benefits to surrounding neighborhoods and businesses, consistent with the Executive Order on Establishing the White House Opportunity and Revitalization Council issued on December 12, 2018.

The Inclusion of the Property Advances the Policy Objectives of the Federal Workplace Element

The Property should be included within the CEA also because it advances numerous policies and objectives of NCPC's Federal Workplace Element. The Property's provides the ideal mixed-use environment based on the significant development currently completed or underway which will promote housing, affordable housing, and retail in close proximity to potential office uses. (FW.B.4, FW.B.7, FW.B.9).

The Property's inclusion in the CEA would also further many transportation goals of the Element. The Property is located near both the Waterfront and Navy Yard Metrorail stations. (FW.B.3., FW.B.4, FW.C.4.) The Property is also located near the Riverwalk trail and the 2nd Street cycle track, providing opportunities for employees to cycle to and from work (FW.C.1, FW.C.2, FW.C.3).

Finally, the Property's inclusion in the CEA would also promote the environmental goals of the Element. The Property is located adjacent to the Anacostia River and

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includes portions of the Riverwalk Trail, which provides significant green space and outdoor opportunities for employees, residents, and visitors to the neighborhood. (FW.C.9, FW.C.10.)

Inclusion of Property in All CEA Maps

The Property should be included in NCPC's CEA for consistency among all three CEA maps. Akridge will continue to advocate for the Property to be included in NCPC's CEA and to continue to be included in the District's and GSA's CEA, as a unified map would best serve everyone's interests.

As a mixed-use property near the existing CEA, providing opportunities for workplaces near home, amenities, and nature, the Property should be included in the CEA of NCPC's Federal Workplace Element. Thank you for your consideration of our request.

Sincerely,

Tom Wilbur
Executive Vice President
Akridge

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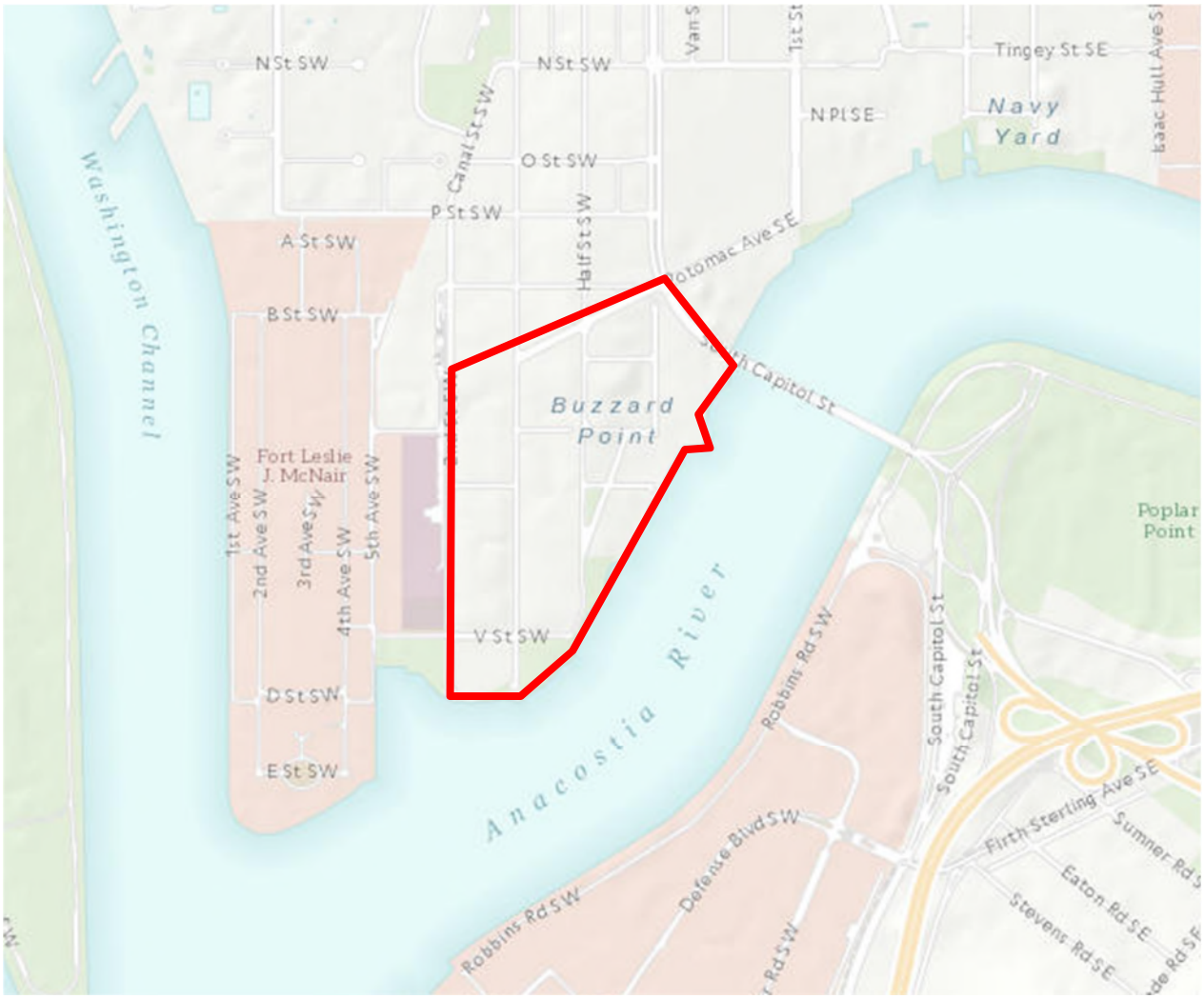
Exhibit A
<u>Property for CEA Inclusion</u>



COMMENTS FROM INTERESTED INDIVIDUALS

Name: DANIEL Maceda
Location: WASHINTON

The plan is impressive. It should be enhanced by a survey and table of surface parking lots used for Federal Employees especially within Washington DC with specific plans to make them impermeable or covered by solar or eliminated and replaced by shuttle transportation from nearby public transit. Of special note the extensive congressional lots within walking distance of Union station or other metro stops. The Federal Publications Buildings and associated parking lots which include the closure of one DC street should be specifically reviewed. No DC street unless required for security purposes should be retained for Federal exclusive usage.

Name: Lavaughn Lee Hamblin
Location: Brooksville, KY 41004

Suggest providing incentives to those providing housing to federal government workers and contractors working in the Washington DC Metropolitan Area and surrounding areas. i.e., Federal Government pay a 10 -25 % incentive to apartment complexes (that meet the Federal Government quality housing criteria) renting to government employees and/or contractors.

I recently worked at Fort Belvoir, VA and commuted from Frederick, MD and paid $1,630 + per month for a modest one bedroom apartment. in Frederick, MD.

Other employee incentives could be developed by the Federal Government to alleviate commuting times and housing crunches on employees and contractors. i.e., increase the opportunities for responsible telework by Federal Employees. Telework would decrease commuting on the interstates, reduce traffic congestion, risk of accidents, and improve overall employee satisfaction.

Suggest studying the high tech workplace environments such as in Silicon Valley and other lucrative workplace areas in the United States to learn lessons on attracting and retaining high quality employees and apply those lessons learned to Federal Government jobs.

Name: David Hendrick
Location: Warrenton, VA

My membership are employed by the Smithsonian and the Kennedy Center. Parking for the Smithsonian employees is almost gone now. People who drive and must park their vehicles, if they can find a spot or garage and pay as much as $25.00 per day. If they live in Virginia, they must take toll lanes because if they do not it will take them as much as 4 hours one way. The tolls on frwy 66 are as much as $38.00 one way. My membership can pay as much as $98.00 per day just to go to work. If they take Metro, they could be fired due to being late to work for taking a broken and mismanaged rail system.

You have no plans to address the financial hardship of the Federal workforce, instead you add speed cameras and more parking meters to fill your overflowing city coffers at the expense of hard working federal employees. You also object to the Federal Government moving some of it's agencies out of DC to states where the cost of buildings is much lower. You have tricked the Federal workforce to oppose this move as well, by not telling them that for the first time in their lives for many of them they would

actually be able to afford a house because the cost of living is so much cheaper and there are no parking issues or $38.00 tolls to rob them of their hard earned dollar.

If you don't want your city to dry up and disappear you need to address the needs of the Federal Workforce just not cater to the Federal Agencies.

Name: Lindsley Williams
Location: Oakland, Maryland

Commissioners and Commission Executives and Staff:

i have been concerned with the challenges of planning for possible flooding in the National Capitol area, and particularly in the lower lying areas of the core of DC as laid out by L'Enfant more than two centuries ago and other low-lying areas along the Potomac River that are now "tidal" to some extent (the Alexandria waterfront and Reagan National Airport come to mind) as do low-lying Federal and regional facilities along the Anacostia River's eastern side (such as the Air Force and Marine Corps bases) and the enormous Blue Plains waste water treatment complex.

It would seem appropriate to develop and include statements in the plan now under review pending adoption about the threat rising sea levels could pose that would be "ocean originating" as distinct from storm water surges that would arrive from land and its current rivers and streams. One way to make this clear would be to include a diagram/map of current shorelines and then show areas that would be inundated if the water level were to rise by 5 foot intervals. I have read news reports that cite projections of a rise in sea level as much as 50 feet from vast melting of what's now frozen far north and far south (the polar icecaps). I can't assert any certainty as to such a rise but if it were to be even half that, the L'Enfant's city's total land area would be greatly reduced. At risk: the Congress, the White House, the Mall and its institutions and memorials, and bridges and tunnels the population and nation know, depend on, and cherish, along with emergency access and exits, air shafts and catch basins that are essential to the connected infrastructure. Add to this all or portions of facilities that are of utmost importance to our nation and its economy, such as the Federal Reserve Bank headquarters and the portion of the Treasury Department that has the duty and capacity to print and distribute our standard currency with its security features.

Sea level rise can also seem to occur when land levels reduce, commonly called "sinking." This is reportedly happening in some areas in the lower Potomac and Chesapeake Bay areas. The draft element should diagram what's known about this as well and discuss the implications.

It could be useful to diagram where full and part time federal employees are located with clusters of dots that range from one to some thousands, and include in this personnel that are in the same location as contract employees or guest workers (a population that can in some instances be larger than the employee count itself).

Some might recommend "sea walls". That's a possibility, but one that has obvious limits and considerable costs to create and maintain.

Should the Capitol and White House move to higher land in DC or Virginia? That's not my preference, but the plan should have a discussion and potential plan to adopt or adapt /revise if and as

circumstances warrant. Such plans should tackle the thorny problems associated with this, particularly who would be in charge (Federal government, States and DC (if not a State by then anyway), localities, citizens, etc.) and how would the funds needed be ready to apply in what may well be a time of great stress and many other demands.

The email is from myself as an individual, not on behalf of any client or organization composed at my dwelling in the hills of western Maryland -- where the elevation is just over 2,500 feet above "sea level."

Let's just plan to keep us all, and our institutions, "dry" and out of "harms way" and look ahead in this situation not just for a decade or two but a century.

Thank you for considering these comments.

Lindsley Williams

Name: Lindsley Williams
Location: Oakland, Maryland

In comments submitted to the portal yesterday, I mentioned an article I had read about threats posed by rising sea levels expected in the future.

I found the story both fascinating and troubling. The list of just US cities that could be affected and have huge costs for even dubious sea walls has upset me. Just in our area and nearby, no mention of Washington DC or Baltimore MD. That's why I think the Federal element on Federal workplace should at least have some discussion or at least a reminder to look at what NCPC has already done on flooding, including floods from the ocean just down the Potomac River. Or, worse, what would happen if the geological fault that is somewhat past the mouth of the Potomac and Chesapeake Bay were to fracture and generate vast and powerful amounts of water that would run out of shoreline in the case of the Potomac when they get just past Georgetown and the Kennedy Center and the effects of the existing topography would stop the oncoming waters but the surge would be of great power to fundamentally change existing development and a natural topography that has been in place for centuries, long before even L'Enfant developed his plan.

Link is here: https://www.nytimes.com/2019/06/19/climate/seawalls-cities-cost-climate-change.html?action=click&module=RelatedLinks&pgtype=Article

Lindsley Williams

Name: Jo-Ann Neuhaus
Location: Washington, DC

I think you should just mention that excellent architecture and attention to urban design is addressed elsewhere in the Comp Plan.

Name: Bernard H. Berne
Location: Arlington, Virginia

The July 11, 2019, draft Federal Workplace Element does not mention Executive Order 12072, August 16, 1978 (Federal Space Management) (https://www.archives.gov/federal-register/codification/executive-order/12072.html) and Executive Order 13006, May 21, 1976 (Locating Federal Facilities on Historic Properties in Our Nation's Central Cities) (https://www.govinfo.gov/content/pkg/FR-1996-05-24/pdf/96-13305.pdf), although previous versions of this Element have cited one or both of these. This needs to be corrected.

For example, page 7 of the 2016 Federal Workplace Element describes and cites Executive Order 12072. Among other things, E.O. 12072 states:

1-1. Space Acquisition.

1-101. Federal facilities and Federal use of space in urban areas shall serve to strengthen the Nation's cities and to make them attractive places to live and work. Such Federal space shall conserve existing urban resources and encourage the development and redevelopment of cities.
.....
1-103. Except where such selection is otherwise prohibited, the process for meeting Federal space needs in urban areas shall give first consideration to a centralized community business area and adjacent areas of similar character, including other specific areas which may be recommended by local officials.
.....
1-301. The heads of Executive agencies shall cooperate with the Administrator in implementing the policies of this Order and shall economize on their use of space.

Executive Order 13006, May 21, 1976 (Locating Federal Facilities on Historic Properties in Our Nation's Central Cities) (https://www.govinfo.gov/content/pkg/FR-1996-05-24/pdf/96-13305.pdf) expands upon E.O. 12072. Section 1 of E.O. 13006 states:

Section 1. Statement of Policy. Through the Administration's community empowerment initiatives, the Federal Government has undertaken various efforts to revitalize our central cities, which have historically served as the centers for growth and commerce in our metropolitan areas. Accordingly, the Administration hereby reaffirms the commitment set forth in Executive Order No. 12072 to strengthen our Nation's cities by encouraging the location of Federal facilities in our central cities. The Administration also reaffirms the commitments set forth in the National Historic Preservation Act to provide leadership in the preservation of historic resources, and in the Public Buildings Cooperative Use Act of 1976 to acquire and utilize space in suitable buildings of historic, architectural, or cultural significance.

Section 1-101 of E.O. 12072 requires federal facilities and federal use of space to strengthen the Nation's cities and to encourage the development and redevelopment of cities. This is a legal requirement.

Section 1 of E.O. 13006 reaffirms the commitment set forth in Executive Order No. 12072 to strengthen the Nation's cities by encouraging the location of Federal facilities in its central cities. Washington, D.C., is the central city of the National Capital Region.

All federal facilities and federal use of space in the National Capital Region that are outside of Washington, D.C. are in violation of E.O. 12072 and E.O. 13006. These violations have resulted in the decrease of federal employment within the District of Columbia and the increase in the increase of federal employment outside of the District.

The violations have greatly decreased the efficiency of the federal government and contributed to suburban sprawl within the National Capital Region. NCPC has done little to stop these violations.

The draft Federal Workplace Element states on page 7: "Federal Employment: City and Regional Distribution" ....

"Historically, federal employment has always been concentrated in Washington, DC. Because federal employment is such an important part of the regional economy, a vital goal is to strike a balance between central and regional locations. In 1960, 63 percent of federal employment (civilian and military) was in Washington.5 By 1990, that share was reduced to approximately 52 percent. Today, the federal employment distribution in Washington is below 49 percent."

The repeated violations of E.O. 12072 and E.O. 13006 by the Administrator of the General Services Administration (GSA) and by the heads of other federal agencies are responsible for this decrease in the federal employment distribution in Washington . NCPC needs to stop these violations by emphasizing the need for the GSA Administrator and the heads of other federal agencies to comply with E.O. 12072 and 13006.

As stated above, the 2016 Federal Workplace Element references E.O. 12072. However, the July 11, 2019, draft Federal Workplace Element does not mention either E.O. 12072 or E.O. 13006. NCPC needs to correct this deficiency.

The section in the draft Federal Workplace Element entitled "Major Drivers Shaping Workplace Policy" on pages 11 - 13 needs to describe Executive Orders 12072 and 13006. The section should state that the provisions of these Executive Orders are legally binding, but that GSA and other federal agencies have repeatedly violated them when purchasing and leasing properties within the National Capital Region.

Page 19 of the draft Federal Workplace Element states:
"Policies
The federal government should:
FW.A.1 Maintain and reinforce Washington, DC as the seat of the federal government by retaining a majority of the regional federal employment in Washington."

An addition to FW.A.1 or a new paragraph should cite Executive Orders 12072 and 13006. The addition or new paragraph that these Executive Orders require that GSA and other federal agencies to locate within Washingon, D.C., all leased and federally-owned facilities that are in the National Capital Region, except where prohibited by federal statutes.

Page 27 of the draft Federal Workplace Element states:
"Policies
The federal government should:
FW.B.1 Prioritize the location of federal workplaces within the designated Central Employment Area (CEA) in Washington, DC. Beyond the CEA, consider sites in proximity to transit and identified by local jurisdictions as priority places for federal facilities. The District of Columbia, NCPC, and other federal agencies should evaluate the CEA as needed to ensure that it reflects current priorities."

FW.B.1. or another paragraph should describe the requirement in Section 1-103 in Executive Order 12072, that, except where such selection is otherwise prohibited, the process for meeting Federal space needs in urban areas must give first consideration to a centralized community business area and adjacent areas of similar character, including other specific areas which may be recommended by local officials.

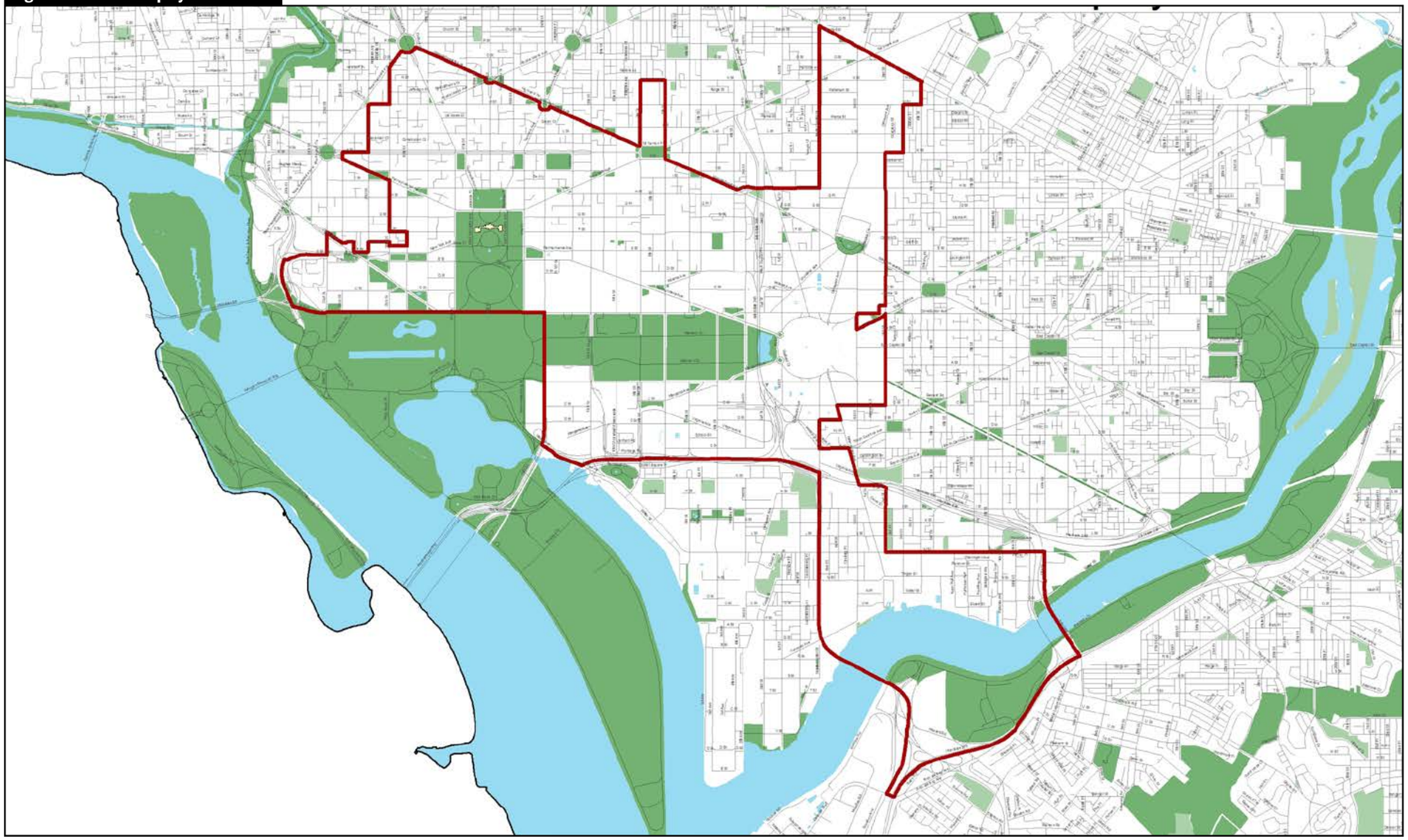
In addition, a new policy (FW.B. ....) should should encourage the location of federal facilities on historic properties in Washington, D.C. and other central cities in the National Capital Region by summarizing the following requirement in Section 2 of Executive Order 13006:

"Sec. 2. Encouraging the Location of Federal Facilities on Historic Properties in Our Central Cities. When operationally appropriate and economically prudent, and subject to the requirements of section 601 of title VI of the Rural Development Act of 1972, as amended (42 U.S.C. 3122), and Executive Order No. 12072, when locating Federal facilities, Federal agencies shall give first consideration to historic properties within historic districts. If no such property is suitable, then Federal agencies shall consider other developed or undeveloped sites within historic districts. Federal agencies shall then consider historic properties outside of historic districts, if no suitable site within a district exists. Any rehabilitation or construction that is undertaken pursuant to this order must be architecturally compatible with the character of the surrounding historic district or properties."

APPENDIX C
EXISTING CENTRAL EMPLOYMENT AREA BOUNDARIES

MARCH 4, 2021

Figure 6: Central Employment Area

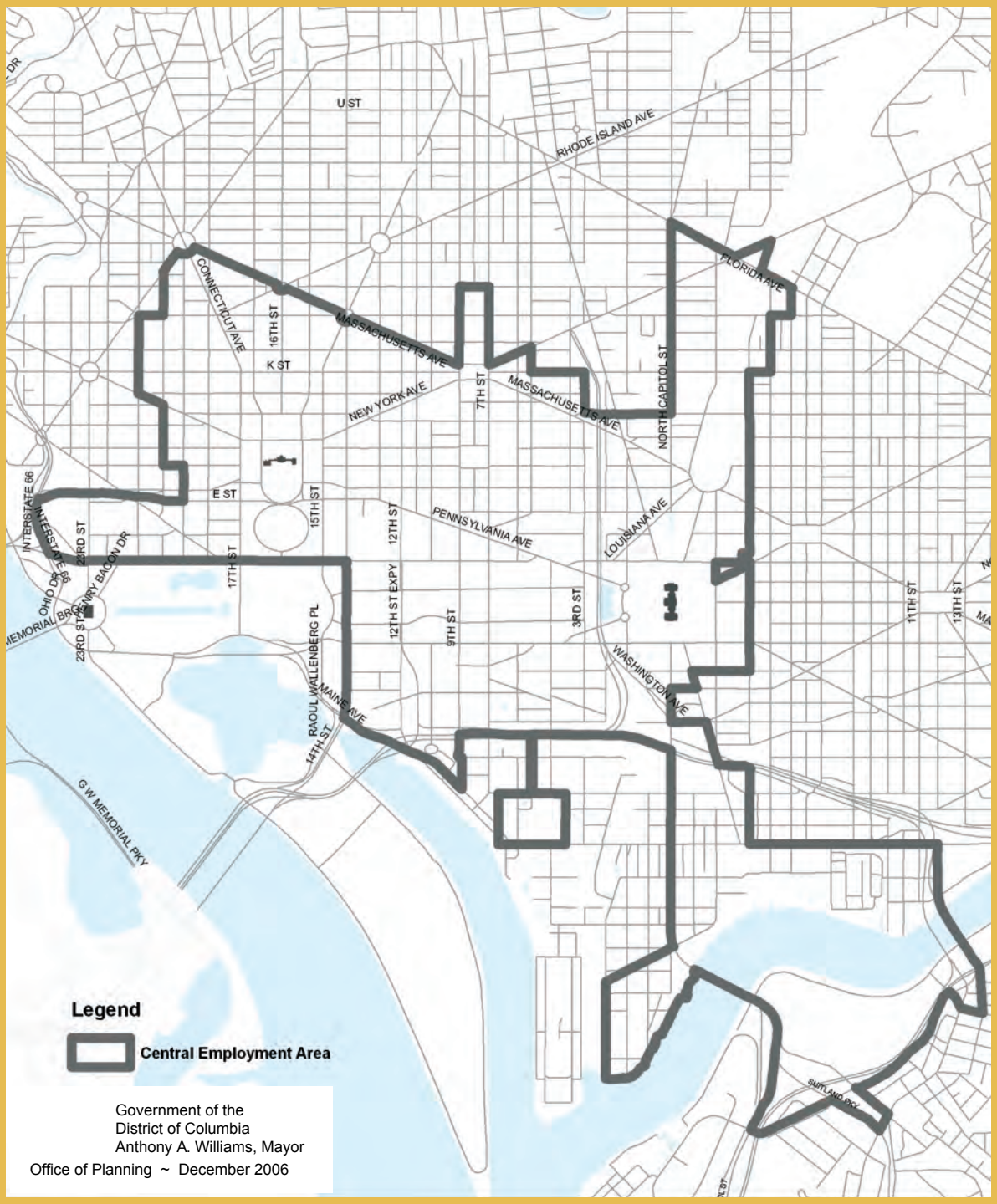


NCPC

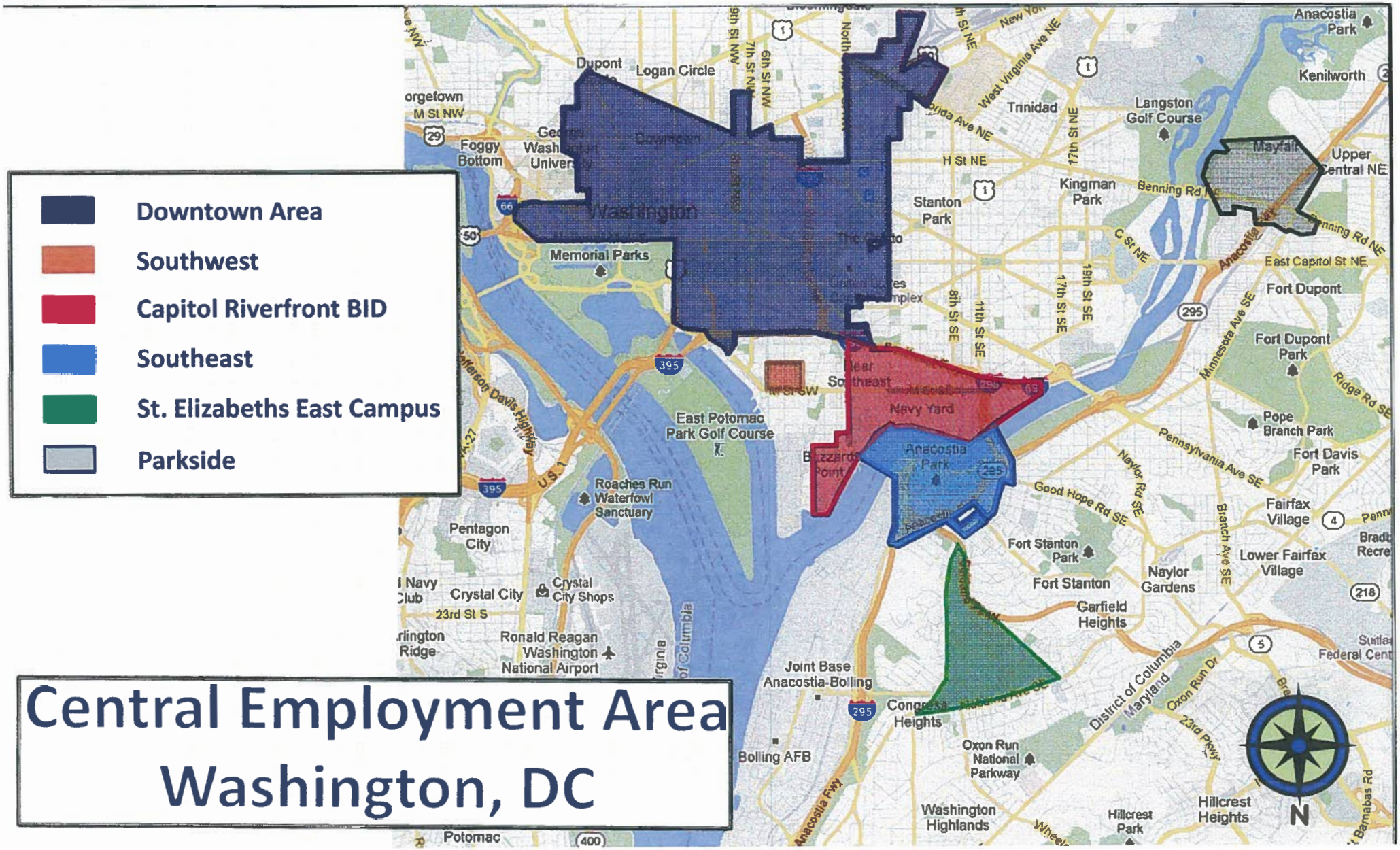
Existing 2016 Federal Elements CEA

Figure 3.2:

Central Employment Area 304.10



Existing District Elements CEA



Existing GSA CEA