



DEPARTMENT OF THE NAVY
NAVAL SUPPORT ACTIVITY WASHINGTON
1411 PARSONS AVENUE SE STE. 303
WASHINGTON NAVY YARD DC 20374-5003

11010
Ser N00/165
1 Apr 09

Ms. Sharon S. Schellen
Chair, District of Columbia Zoning Commission
441 4th Street NW
Suite 210 South
Washington, DC 20001

Dear Ms. Schellen:

SUBJECT: PUBLIC HEARING FOR CASE # 03-12G & 03-13G, CONCERNING
SQUARE 882, LOCATED ALONG M STREET SE AT 6TH STREET

Naval Support Activity Washington has some significant concerns regarding the re-zoning of the areas indicated on the enclosed Zoning Map of M Street area from your website at <http://dcoz.dc.gov/services/zoning/commish.shtm>

We request that the record be reopened to accept filing of our comments to the public record in reference to zoning cases 03-12G and 03-13G. The current R-5-B zoning for the southern half of Square 882 limits the building height to a maximum height of fifty (50) feet. The District's conditional approval rezoning the southern portion of Square 882 to the CR zoning designation, by Zoning Commission Order Number 03-12G/03-13G, would allow a maximum height restriction of ninety (90) feet. The current application for the Second Stage Planned Unit Development (PUD) further requests an increase in height for the southern portion of Square 882 to a maximum height of ninety-two (92) feet. As proposed, the rezoning would allow buildings on the southern half of Square 882 be increased to a height of ninety-two (92) feet where presently the height is limited to fifty (50) feet. The Navy opposes the proposed height provisions of this amendment for the following two reasons:

1. Specific to the zoning issues before the commission, it is the Navy's concern the additional height could potentially compromise the integrity of the Washington Navy Yard (WNY) Historic District, including the Latrobe Gate. According to the Department of the Interior, new construction adjacent to historic properties should consider the location, size, scale, and design of the new construction in relationship to the historic building or buildings. Views from, as well as of, the

NAVY COMMISSION
District of Columbia
ZONING COMMISSION
District of Columbia
CASE NO. 03-12G/03-13G
EXHIBIT NO. 81
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historic property should also be taken into consideration for all new construction. The Navy believes that buildings exceeding the currently permitted fifty (50) foot height restrictions located across M Street from the Navy Yard Historic District will negatively impact the view shed from the Navy Yard. The WNY Historic District is listed in the National Register and is a designated National Historic Landmark and a locally designated DC Landmark. The WNY District extends south from M Street to the Anacostia River, and west from Parsons Avenue (9th Street) to Isaac Hull Avenue (6th Street). The L'Enfant Plan for the City of Washington, developed during the 17th Century, indicated that the Southeast quadrant of the city should be developed with industrial facilities, including a Navy Yard on the Anacostia River. In 1799, the WNY was officially established on the northern bank of the Anacostia River, in accordance with the L'Enfant Plan.

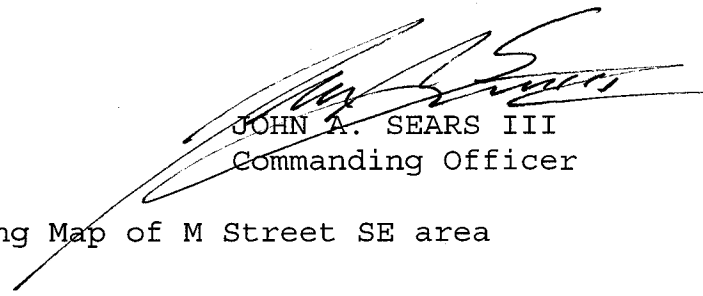
The Latrobe Gate is at the intersection of 8th Street and M Street in Southeast Washington. It is a Greek Revival structure which has been incorporated into the ground story of a three-story late-Victorian building. The gate was designed by Benjamin Latrobe, one of America's foremost early architects, in 1804 and was one of the first structures built at the WNY. It has been in continuous use as the principal entrance to the Yard since 1806. The Gate contributes significantly to the cultural heritage and visual beauty of the District of Columbia and was listed on the National Register of Historic Places in 1973.

2. The second issue is that buildings of additional height immediately adjacent to our perimeter could potentially increase the opportunity for compromises to the safety and security of personnel living and working in the WNY. We have safety and security concerns in any case where nearby buildings exceed the height of our historic perimeter wall, providing direct line of sight into the WNY. Direct line of sight into the WNY poses risks in several manners, including but not limited to, direct fire, observation and surveillance. Electronic monitoring using line-of-sight techniques poses risks to worldwide Naval operations.

We appreciate the opportunity to comment and request that the Zoning Commission confirm when our comments have been accepted into the public record. For any questions,

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please contact Mrs. Janell Herring at 202-433-0452 or
through email janell.herring@navy.mil

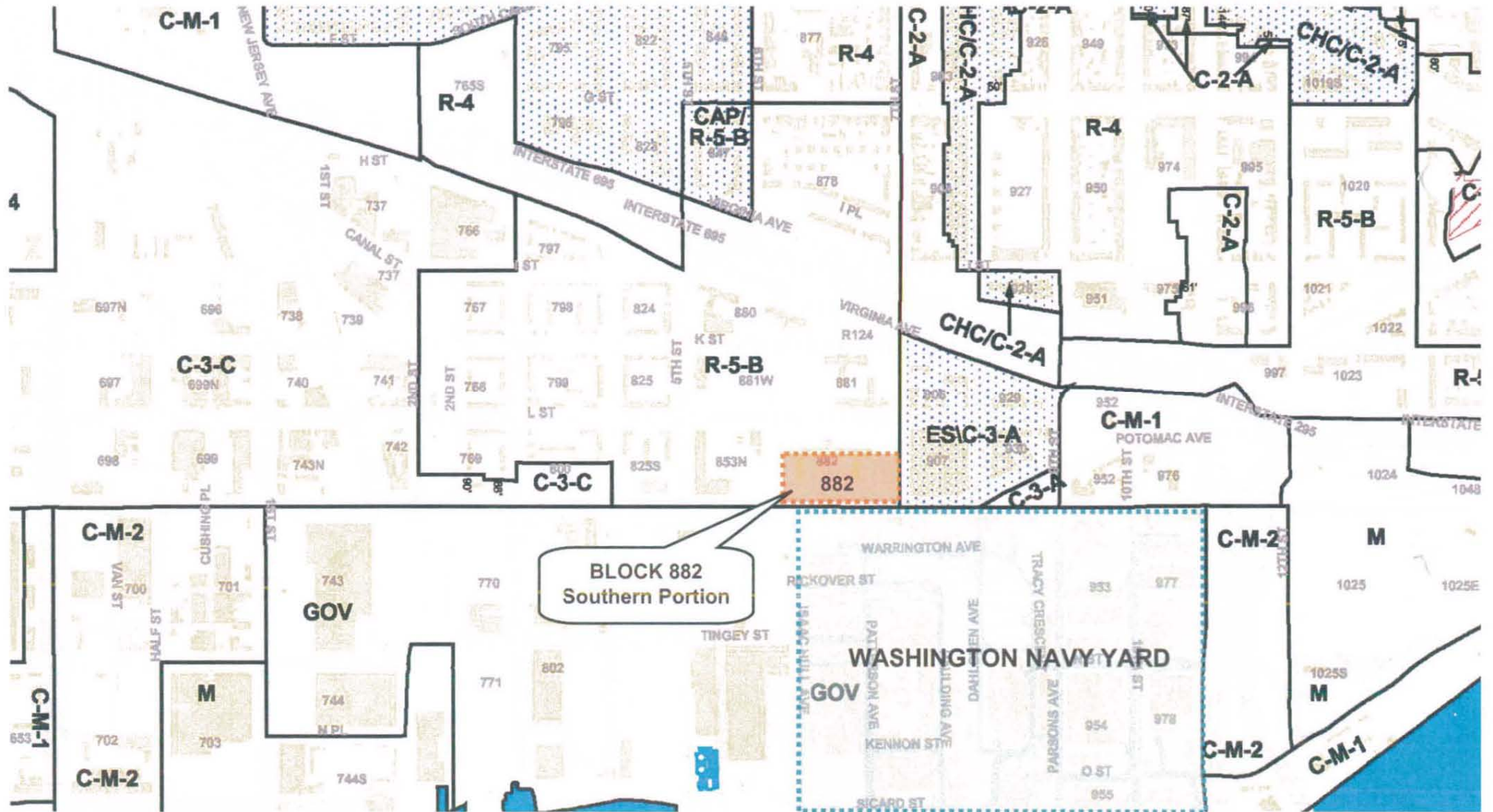


JOHN A. SEARS III
Commanding Officer

Enclosure: 1. Zoning Map of M Street SE area

Copy to:
NAVFAC Washington
PWD Washington
NDW Community Liaison

ENCLOSURE 1: ZONING MAP OF M STREET SE AREA



SOURCE: DC OFFICE OF ZONING
WWW.DCOZ.DC.GOV; March 31, 2009