## GOVERNMENT OF THE DISTRICT OF COLUMBIA OFFICE OF PLANNING



**MEMORANDUM** 

District of Columbia Zoning Commission TO:

Deputy Director, Development Review & Historic Preservation FROM:

DATE: April 14, 2008

SUBJECT: Public Hearing Report for ZC 08-01

Southeast Federal Center (SEFC) Parcel D, M Street SE and 4th Street SE

Zoning Commission Design Review Under the SEFC Overlay

#### I. SUMMARY RECOMMENDATION

The Office of Planning recommends approval of the proposed design, subject to:

Approval by the Zoning Administrator of the permitted combined lot allocation of residential and non-residential uses, needed to facilitate the use mix associated with this development:

Provision of additional detail and assurances regarding green building initiatives;

Provision of design and material details for the loading entrance from 4th Street SE. to ensure its potentially negative visual impacts are minimized.

#### **APPLICATION-IN-BRIEF** H.

Square 826, South East Federal Center site, Ward 6, ANC 6D Location:

Between M Street SE and Tingey Street SE, at 4th Street SE

Forest City LLC, for the General Services Administration of the USA Applicant:

SEFC/CR (Southeast Federal Center Overlay/Commercial Residential) **Current Zoning:** 

**Proposed Development:** The applicant is proposing to construct a new mixed use residential,

office, and ground floor retail building with underground parking and

internal loading facility.

Pursuant to 11 DCMR §1803.2(n), all development that has frontage along M Review and Relief:

Street SE is permitted only if reviewed and approved by the Zoning

Commission.

Pursuant to §1803.6, the applicant is also seeking Zoning Commission review of a building east of 4th Street SE that is greater than 90' (110' is proposed).

The applicant also seeks area variance relief from rear yard requirements (§636), preferred uses (§1803.3) and loading requirements (§2201.1), and special exception relief from rooftop structure regulations (§411).
ZONING COMMISSION

District of Columbia

CASE NO.

EXHIBIT NO

**EXHIBIT NO.30** 

of Columbia

Office of the Director

## III. EXECUTIVE SUMMARY

The applicant is seeking Zoning Commission design review approval pursuant to the SEFC Overlay to construct a mixed use building on the SEFC site known as Parcel D. No PUD or rezoning approval is required. Although technically one building, the project will appear as two buildings. The north tower will be office with a ground floor grocery store; the south tower will be residential with some ground floor retail although flood plane issues limit the amount of façade available for effective retail space. Underground parking for 325 cars would be provided, as well as an internalized loading area accessed from 4<sup>th</sup> Street SE to the west and a private alley to the east of the buildings. Maximum height would be 110 feet for which Zoning Commission review is required. The design is generally consistent with the objectives and Zoning Commission review standards for the SEFC Overlay. OP supports the application and feels that it will provide an attractive gateway to the SEFC site, as well as an influx of both daytime and evening activity. The grocery store will be an important benefit to future SEFC residents, workers and visitors, and to current and future residents and workers in the neighborhood.

#### IV. BACKGROUND

The SEFC site is located in the Near Southeast area and is bound generally by M Street, SE to the north; 1<sup>st</sup> Street, SE to the west; the Anacostia River to the south; and the Washington Navy Yard to the east. The SEFC is approximately 42 acres not including an 11 acre parcel on M Street, SE which is the site of the new Department of Transportation (USDOT) Headquarters (ZC Case #03-05). The Federal site was previously not zoned. It had, in the past, been utilized in wartime production as part of the Washington Navy Yard, but in 1962 was transferred to the GSA. The SEFC Public-Private Development Act of 2000 granted GSA the authority to enter into discussions for private sector development of the site. Following many years of planning and coordination with the District regarding development options, the GSA requested zoning for the site in 2003. In Case # 03-06 (July 9, 2004), the Zoning Commission approved a comprehensive zoning package, including the SEFC Overlay. Subsequently, the GSA selected Forest City LLC as the master developer for the site. The entire SEFC development will consist of approximately 1.8 million square feet of office, 2,800 residential units, neighborhood and destination retail, and a large waterfront park. A number of historic buildings are to be preserved and incorporated into the plan.

The SEFC was also determined to be eligible for listing in the National Register of Historic Places in 1977. A Programmatic Agreement between GSA, the State Historic Preservation Office (SHPO) and the Advisory Council on Historic Preservation incorporates design guidelines for new construction, as well as for the treatment of remaining buildings.

#### V. SITE AND AREA DESCRIPTION

The Parcel D property is located at the south-east intersection of M Street SE and 4th Street SE, directly to the east of the new US DOT building, a few blocks north of the Anacostia River. The site is relatively flat, paved over, and currently has no buildings on it, although the historic Sentry tower and wall border the property at its north-west corner.

## VI. PROJECT DESCRIPTION – refer to Project Profile, Attachment II

The applicant is proposing to construct a new mixed use building on the site. The building would have two main components – the north tower would be largely office with a full service ground level grocery store, while the south tower would be residential, with between 170 and 200 units and

some ground floor retail. All parking would be underground, and loading for all uses would be internal to the building with access from 4<sup>th</sup> Street SE to the west and a new private alley to the east. The total square footage would be just over 600,000. OP is supportive of the overall massing and design of the proposal.

## VII. COMPREHENSIVE PLAN FUTURE LAND USE AND POLICIES MAPS

The Future Land Use Map designated the site is for mixed use high density residential / commercial development. The proposed development is not inconsistent with this designation. The Generalized Policy Map indicates the site for Land Use Change, from federal to private mixed use development.

## VIII. COMPREHENSIVE PLAN

As noted above, the proposed project is generally in conformance with zoning regulations and with the SEFC Overlay objectives. As such, the proposal is considered consistent with the Comprehensive Plan. It would particularly further the following Guiding Principles of the Plan:

Managing Growth and Change: Guiding Principles 217

- (4) The District needs both residential and non-residential growth to survive. Non-residential growth benefits residents by creating jobs and opportunities for less affluent households to increase their income. 217.4
- (5) Much of the growth that is forecast during the next 20 years is expected to occur on large sites that are currently isolated from the rest of the city. Rather than letting these sites develop as gated or self-contained communities, they should become part of the city's urban fabric through the continuation of street patterns, open space corridors and compatible development patterns where they meet existing neighborhoods. Since the District is landlocked, its large sites must be viewed as extraordinarily valuable assets. Not all should be used right away—some should be "banked" for the future. 217.5

Increasing Access to Education and Employment: Guiding Principles 219

(21) Land development policies should be focused to create job opportunities for District residents. This means that sufficient land should be planned and zoned for new job centers in areas with high unemployment and under-employment. A mix of employment opportunities to meet the needs of residents with varied job skills should be provided. 219.6

Building Green and Healthy Communities: Guiding Principles 221

(34) As the nation's capital, the District should be a role model for environmental sustainability. Building construction and renovation should minimize the use of non-renewable resources, promote energy and water conservation, and reduce harmful effects on the natural environment. 221.3

By providing for a new, mixed use development at the entry to the SEFC site, the proposal would also further policies of the Land Use, Housing, Economic Development, and Urban Design elements. The development would also further relevant specific policies of the Lower Anacostia Waterfront/ Near Southwest Area Element by helping to restore the urban pattern (AW-2.3.1), enhancing housing opportunities (AW-2.3.3), enhancing M Street SE (AW-2.3.4), and providing new retail amenity space (AW-2.3.6).

### IX. ANACOSTIA WATERFRONT INITIATIVE

The subject site is within the Anacostia Waterfront Initiative (AWI) area. The vision of the AWI is of a clean and vibrant waterfront with a variety of parks, recreation opportunities, and places for people to meet, relax, encounter nature and experience the heritage of the waterfront. The AWI also seeks to revitalize surrounding neighborhoods, enhance and protect park areas, improve water quality and environment, and, increase access to the water and maritime activities along the waterfront. One of the neighborhoods designated for improvement is the Near Southeast target area, which includes the SEFC site. The proposed development on Parcel D would further many important planning principles cited in the AWI Framework Plan for the Near Southeast target area:

- 1. Extend the surrounding urban fabric to the waterfront, bringing the city to the Anacostia River.
- 2. Build upon the current wave of public and private development to create a comprehensive vision for the Near Southeast, integrating diverse projects.
- 7. Emphasize mixed-use development, integrating commercial and residential areas, to form a lively and active neighborhood throughout the Near Southeast.
- 8. Provide diversity in housing types and income levels to ensure a strong and balanced neighborhood.
- 9. Encourage commercial development to maximize economic growth and job creation, emphasizing major street corridors and transit connections. (p. 119)

## X. Zoning

In Case # 03-06 (July 9, 2004), the Zoning Commission approved a comprehensive zoning package for the SEFC site. The SEFC zoning and Overlay were the culmination of many years of planning by the General Services Administration (GSA) and the Office of Planning. The SEFC Overlay was intended to provide for the expeditious development of the 42 acre SEFC site, and to encourage a mixed-use, pedestrian-friendly environment. Various portions of the site were zoned CR, R5E, R5D, and W-0 to encourage an appropriate combination of uses with a significant new park along the Anacostia River. The SEFC Overlay District was also established, "intended to provide for the development of a vibrant, urban, mixed-use, waterfront neighborhood, offering a combination of uses that will attract residents, office workers, and visitors from across the District and beyond" (§1801.1). While much of the development on this large site will be by-right, the SEFC Overlay stipulates that development along M Street SE and adjacent to the waterfront park will require Zoning Commission review. In ZC Case 07-11, the Commission is currently considering minor amendments to the SEFC Overlay and the zoning map to accommodate the master plan developed for Forest City – the public hearing is closed, the Commission is scheduled to take final action on April 14, 2008.

The subject site is within the SEFC/CR District. The CR District is intended to "help create major new residential and mixed use areas in planned locations at appropriate densities, heights and mixture of uses" (600.3(a)). The proposed development does not require a PUD or rezoning, and conforms to most aspects of the zoning regulations, including FAR and use. In addition to mandatory Zoning Commission review of any new building with frontage on M Street SE, and approval of a building height of 110', the applicant's proposal requires relief from specific zoning regulations, analyzed below.

## XI. M STREET SE REVIEW

Pursuant to §1803.2 (n), "All buildings and structures that have frontage along M Street, S.E. are only permitted if reviewed and approved by the Zoning Commission, in accordance with the standards specified in § 1808". Relevant reviews standards, applicable to this portion of the SEFC site, include the following:

1808.1(a) The use, building, or structure will help achieve the objectives of the SEFC Overlay District as set forth in § 1802;

The objectives of the SEFC Overlay are as follows:

Assure development of the area with a mixture of residential and commercial uses and a suitable height, bulk, and design of buildings, as generally identified in the Comprehensive Plan and in recognition of the objectives of the Anacostia Waterfront Initiative and the Near Southeast Urban Design Framework Plan. (§1802.2)

The proposed development would consist of new residences, office and retail, including a full service grocery store. As such, the proposal would provide for the mix of uses anticipated and planned for the area. The buildings are within the height permitted by the Zoning Commission, and the density and lot occupancy permitted by the zoning, so the building bulk is also considered consistent with the plan objectives and with existing and anticipated surrounding developments. Finally, in terms of design, the buildings would provide a modern interpretation of an industrial character appropriate to the site.

Encourage high-density residential development with a pedestrian-oriented streetscape through flexible zoning parameters. (§1802.3)

The proposal would include residential at an appropriate density on the south portion of the site. Although the site is constrained by flood plain issues not anticipated at the time that these objectives were drafted, the design provides a suitably pedestrian-oriented streetscape along both Tingey Street and 4<sup>th</sup> Street SE. As part of the current case before the Zoning Commission to amend the SEFC Overlay requirements, the master developer has requested, and OP supports, the elimination of the retail requirement on the east portion of this block of Tingey Street – the proposal would conform to the intent of the amended regulation, in that it would provide retail at the intersection of 4<sup>th</sup> and Tingey Street SE.

Encourage a variety of support and visitor-related uses, such as retail, service, entertainment, cultural, and hotel or inn uses. (§1802.4)

This portion of the SEFC site was not anticipated for cultural, entertainment, or hotel uses. Rather, it is envisioned as a more local neighborhood, with residences, some office, and neighborhood serving retail. The site provides the full service grocery store, a retail component critical to the overall success of the SEFC development, as well as other neighborhood serving retail space.

Provide for a reduced height and bulk of buildings along the Anacostia riverfront in the interest of ensuring views over and around waterfront buildings, and provide for continuous publicly-accessible open space along the waterfront. (§1802.5)

Not directly applicable, as the site is not adjacent to the waterfront. However, the proposal provides for adequate access onto the SEFC site and towards the waterfront. The grocery store, in particular, will draw other neighborhood residents to the site.

Require suitable ground-floor level retail and service uses near the Navy Yard Metrorail station; along M Street S.E.; near the SEFC/W-0 District; and at other key pedestrian locations. (§1802.6)

The primary retail component – the grocery store – is located adjacent to M Street SE. The presence of the historic wall, however, along M Street SE limits the direct access to the grocery store, or any other use, from M Street, except at 4th Street SE. In fact, §1803.3 states that the M Street retail requirement "shall not apply to buildings directly south of the historic wall along M Street, S.E. between 4th Street, S.E. and the Washington Navy Yard, for so long as the wall remains.".

Encourage the design and development of properties in a manner that is sensitive to the adjacent Navy Yard and the historically significant buildings within the SEFC. (§1802.7)

The applicant has worked with OP, including the HP Office, to ensure that the project is sensitive to the overall historic, industrial character of the SEFC site. The HP Office has given the proposal 35% design review, with generally positive comments that the proposal is generally consistent with the established design guidelines, with only relatively minor design-related issues to address as part of more detailed submissions.

Establish zoning incentives and restrictions to provide for the development of a publicly-accessible park along the Anacostia River and encourage uses in that park as permitted in the W-0 District. (§1802.8)

No applicable to this aspect of the SEFC development.

- (b) The proposed building or structure shall be designed with a height, bulk, and siting that provides for openness of view and vistas to and from the waterfront and, where feasible, shall maintain views of federal monumental buildings, particularly along the New Jersey Avenue, S.E. corridor;
  - The subject site is well removed from New Jersey Avenue, but would provide for views through the site towards the waterfront from the north. The proposal would not impeded views to the historic Navy Yard to the east, or to the historic sentry tower.
- (c) On or above-grade parking adjacent to, or visible from, the street shall be limited. Where parking cannot be placed underground, other uses such as retail or residential shall separate parking areas from the street, or where this is not possible, green landscaping or architectural treatment of facades shall adequately screen parking from the street and adjacent development.
  - All parking on this site is proposed to be underground. The loading is also internalized into the building, to minimize visual impacts. Although OP has expressed to the applicant concerns about the large loading truck entrance located across a primary pedestrian street onto the SEFC site 4<sup>th</sup> Street SE it is acknowledged that options are limited, and that the proposed location would limit the amount of travel time on local streets for delivery trucks. OP has encouraged the applicant to use design means to visually minimize the loading door area. To date, OP has not received comments from DDOT on this aspect of the design.

- 1808.2 In evaluating the application, the Commission also may consider:
  - (a) Compatibility with buildings in the surrounding area through overall massing, siting, details, and landscaping;

The proposal would provide an effective transition between the existing 120' high US DOT building to the west, and the existing historic building to the east. Other M Street buildings are, or anticipated to be, 110 to 130 feet in height. As noted above, the proposed siting, massing, and design have received positive response from the HP Office for its contextual fit.

(b) Use of high standards of environmental design that promote the achievement of sustainable development goals;

The applicant has not fully addressed this criterion. The application indicates that the proposed building will "incorporate many environmentally responsible and sustainable features and will pursuer LEED Certification" (P. 5). The drawings show an LID zone in the public space, and "potential green roof." The submission also notes other sustainable components, such as bike storage, reduced water-usage systems, and redevelopment of a Brownfield, but provides no details. OP has requested that the applicant provide, at or prior to the hearing, a completed LEED checklist, and more detail and assurances regarding green building initiatives.

(c) Facade articulation that minimizes or eliminates the visibility of unarticulated blank walls from public spaces;

Although the drawings are somewhat conceptual, the design would provide a varied and articulated set of building facades. Ground floor retail would be provided where possible. On the portion of Tingey Street where flood plain issues make the provision of effective retail impractical, the applicant is proposing residential units with direct access to the street.

OP would prefer that the large grocery store space be lined with active, independent retail uses, but space limitations preclude this option and the grocery store is considered an asset to this site. OP has encouraged the applicant to pursue placing elements such as the grocery store deli, florist, vegetable stand, or coffee shop along the exterior wall with direct access to 4<sup>th</sup> Street.

As noted above, OP has some concerns with the proposed loading entrance from 4<sup>th</sup> Street SE, and has requested the applicant provide additional detail regarding how the design and materials would minimize the potential visual impacts and potential safety issues.

(d) Landscaping which complements the building;

Most of the street level landscaping will be on public space, which will be reviewed by DDOT and OP as part of the pre-permit and public space review, but is generally acceptable. Otherwise, OP encourages the applicant to provide meaningful and usable green roofing on portions of the roof accessible to residents or workers.

(e) For buildings that include preferred uses in accordance with §§ 1803.3 or 1804.3, the Commission may consider the balance and location of preferred uses;

Under the proposed amendments to the SEFC Overlay, preferred retail uses are not required on this site, but are permitted. The proposal provides retail along portions of 4<sup>th</sup> Street SE, including the grocery store. Retail is also provided at the corner of 4<sup>th</sup> and Tingey Streets SE, to complement retail required to be placed on all other corners of this intersection. The applicant has requested some relief from the preferred use requirements, as described below.

## XII. BUILDING HEIGHT REVIEW

As noted below, the zoning regulations require Zoning Commission review of any building exceeding 90 feet in height on this portion of the SEFC site:

1803.6 Notwithstanding § 1803.5 (which would otherwise allow a building of 110' on this site by-right), a height of greater than 90 feet and no more than 110 feet shall be permitted for sites fronting on M Street, S.E. east of 4th Street, S.E. if reviewed and approved by the Zoning Commission pursuant to the procedures set forth in § 1809 herein. The Commission shall consider the relationship of the new building to the Navy Yard to the east and may require graduated height and/or design features because of the building's proximity to the Navy Yard.

The 110' building height would provide an effective transition between the existing USDOT building at 120 feet to the west, and the existing historic structure to the east. Other buildings on M Street are, or anticipated to be, 110 to 130 feet in height. The site is not directly adjacent to the Navy Yard. As such, impacts should be minimal.

## XIII. RELIEF REQUIRED FROM ZONING REGULATIONS

§1809.1 states that "At the time the Commission is considering an application for Zoning Commission approval authorized by this Chapter, it may hear and decide any additional requests for zoning relief needed for the subject property". In this case, the applicant has requested both variance and special exception relief.

#### a. Variance Relief

## i. Rear Yard (§636.1)

The property is bordered by two existing streets (M and 4<sup>th</sup> Streets), and a third "pending" but not yet opened street (Tingey Street). Technically, a rear yard of more than 28 feet in depth is required along either Tingey Street or along the east lot line. However, the applicant notes that, if Tingey Street was already dedicated, the property would border on three streets, and §636.5 states that a rear yard would not be required.

A large rear yard setback along Tingey Street would not be desirable from an urban planning perspective. A wide rear yard to the west of the property would also unnecessarily break up the streetscape in a way that would not be in character with either the master plan for the site or with the existing character. Since rear yard relief would not be needed once Tingey Street is dedicated, OP does not believe that the request would harm the integrity of the zoning regulations.

## ii. Preferred Use Display Window (§1803.3 (e)) and Clear Ceiling Height (§1803.3 (g))

The site is not required to provide "preferred use retail" as defined in the SEFC Overlay, but the regulations allow such retail to be provided where not required. As currently drafted, this retail

space would be required to conform to a set of design requirements outlined in §1803.3, including that:

Not less than fifty percent (50%) of the surface area of the street wall, including building entrances ... shall be devoted to doors or display windows having clear or low emissivity glass; (e) and

The minimum floor-to-ceiling height for portions of the ground floor level devoted to preferred uses shall be fifteen (15) feet. (g)

The proposed design does not entirely meet these requirements – the grocery store will not devote 50% of its streetwall to display windows having clear or low emissivity glass, and the space will not provide the currently required 15' floor to ceiling height.

Zoning Commission Case 07-11, for which final action is scheduled to be taken on April 14, 2008, includes amendments stating that non-required preferred use space would not have to meet these design regulations. The intent is to provide for more variety of retail options on the SEFC site — although high ceilings and extensive glazing are important for many types of "destination" or high end retail, they are not needed for other forms of more local serving retail and, in fact, could "price out" local retail from the space. As such, OP recommends that, if relief is required at the time of the hearing for this case, such relief be granted as being the result largely of the specific and highly desired retail proposed for the site (the grocery store) and to ensure a broad range of neighborhood serving retail for the SEFC site.

## iii. Loading Space (§2201)

Under current regulations, separate loading spaces are required for each individual use in a mixed use building, even when designed such that some or all of the spaces could be shared. As noted in the Project Profile, seven loading berths and platforms are required for this proposal; the applicant is proposing six loading berths and platforms. The provision of additional, space consuming loading berths could eliminate more desirable ground floor retail or residential space proposed. OP has no concerns with granting this relief.

## b. Special Exception Relief

#### i. Rooftop Structure Walls of Equal Height (§411)

Although the roof structures conform in most respects, including setback from exterior walls, zoning regulations require that all walls be of equal height. In this case, the structures range from 15.5 to 18.5 feet in height.

1) Will the requested special exception be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps;

Generally, the intent is to ensure that rooftop structures have minimal visual impact on the skyline, and that potential shade impacts are also minimized. The applicant could make the structures conform by raising the height of the lower portion – this would not be consistent with the intent of the regulations.

2) Will the special exception, if granted, tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Map

As rooftop structures are set well back from external building walls below, and the relief would lessen the height and therefore the potential visual impact of the rooftop structures, the relief should not have any negative impact on the use of neighboring properties.

## XIV. AGENCY REFERRALS

OP has not received comments from other District agencies. OP understands that the applicant has met with DDOT, but OP has not yet received comments.

## XV. COMMUNITY COMMENTS

The Office of Planning has received no comments on the project from the community.

## XVI. RECOMMENDATION

The proposed development is consistent with the Comprehensive Plan, the Near Southeast target area objectives within the Anacostia Waterfront Initiative Framework Plan, and the SEFC Overlay. The proposal is generally consistent with zoning. The development would add both daytime workers and full time residents to the SEFC site, as well as retail (particularly a full service grocery store) that are critical to the successful creation of this new neighborhood – both on and adjacent to the SEFC site.

As such, the Office of Planning recommends approval of the proposed mixed use development on Parcel D, subject to:

- Approval by the Zoning Administrator of the permitted combined lot allocation of residential and non-residential uses, needed to facilitate the use mix associated with this development;
- Provision of additional detail and assurances regarding green building initiatives;
- Provision of design and material details for the loading entrance from 4<sup>th</sup> Street SE, to ensure its potentially negative visual impacts are minimized.

JS/jl

#### **ATTACHMENTS**

- 1. Vicinity Map
- 2. Project Profile



# SEFC Overlay Area Zoning Districts National Parks DC Parks Property Squares

Government of the
District of Columbia
Adrian M. Fenty, Mayor

Office of Planning ~ April 2008

This map was created for planning purposes from a variety of sources. It is neither a survey nor a legal document. Information provided by other agencies should be verified with them where appropriate.



# Zoning Commission Case . 08-01, SEFC Parcel D - Project P e

Standard	SEEC/CR	Proposed <sup>1</sup>	Relief Needed
Site Area:		approx. 101,376 sq.ft.	50 - 51 - 50 - 50 - 50 - 50 - 50 - 50 -
FAR:			
Residential max.	6.0	2.09	conforming
Non-residential max.	3.0	3.88 <sup>2</sup>	conforming
Total max.	6.0	5.97	conforming
Square Footage:	-		
Residential max.	608,256 sq.ft.	211,600 sq.ft.	conforming
Non-residential max.	304,128 sq.ft.	393,400 sq.ft.	conforming
Total max.	608,256 sq.ft.	605,000 sq.ft.	conforming
Lot Occupancy:	100% max.	75%	conforming
Setbacks:			
Rear Yard:	3" / foot of height = 28.25'	12.6'	Relief required
Side Yard:	not required but 3" / foot of height if	none	conforming
	provided		
Height:	90' max.;	110'	Requires ZC
	110' with ZC approval		approval
Stories:	not regulated	North-9; South - 11	conforming
Preferred Uses:			
Amount of preferred use:	Not required	Provided on 4th Street & a	conforming
<u>.</u>	•	portion of Tingey St.	
display window:	50% of frontage min,	< 50%	Relief required
access:	Direct exterior access to street	provided	Conforming
Clear height:	15' min. <sup>3</sup>	North tower: 14 – 20'	Relief required
		South tower – 13'	
Roof Structure			
Max. Height:	18.5' max.	18.5' max.	conforming
Wall Height:	Must be equal	Varies 15.5 – 18.5 ft.	Relief required
Number:	1 / core	1 / core .	conforming
Setback:	= roof structure height	18.5' min.	conforming
Parking:	-	,	
Residential:	1 / 3 units = 67 min.	67	Conforming
Office:	1 / 1800 sq.ft. min. <sup>4</sup> = 186 min.	186	Conforming
Retail:	1 / 750 sq.ft. min. <sup>5</sup> = 72 min.	72	Conforming
TOTAL:	325 total required	325 minimum	Conforming
Small Car Spaces	40% of total, max.	unknown	unknown
Bicycle Parking Spaces:	5% of required office and retail spaces	unknown	unknown
	= 13 min.	,	
55' Loading Berths:	2	2	Conforming
30' Loading Berths:	4 5	4	Relief required
200 sq.ft. Loading Platforms:	2	2	Conforming
100 sq.ft. Loading Platforms:	5	4	Relief required
20' deep service / delivery:	3	3	conforming

Information supplied by applicant.

The non-residential cap is permitted to be exceeded through the applicant entering into a Combined Lot Agreement, through which another site zoned SEFC/CR forever relinquishes an equivalent amount of non-residential development.

As part of Zoning Commission Case 07-11, for which Final Action is pending, the required clear floor to ceiling height would decrease to 14 feet minimum.

Gross area in excess of 3,000 sq.ft.

Gross area in excess of 3,000 sq.ft.