



DEPARTMENT OF THE NAVY
Naval Support Activity Washington
1411 Parsons Avenue, S.E., Suite 303
Washington Navy Yard, D.C., 20374-5003

11000
Ser N4/302
December 7, 2017

Zoning Commission for the District of Columbia
441 4th Street, N.W., Suite 200/210-S
Washington, D.C. 20001

Dear Commission,

SUBJECT: ZC CASE NO. 17-12 (FOREST CITY SEFC, LLC – TEXT AND ZONING MAP
AMENDMENTS @ SEFC-1 ZONE)

The Navy continues to support the revitalization of the Southeast Federal Center (SEFC) and appreciates the positive changes which have occurred over the last ten years. The SEFC has become a destination for people to live and work. This development benefits those who work at the Washington Navy Yard (WNY) and provides options to live nearby, making the WNY more attractive for current and potential employees. The WNY is a primary headquarters for the U.S. Navy in the National Capital Region and supports numerous Navy operations.

While the Navy is supportive of the SEFC, the dense urban development poses challenges and impacts to security of the WNY, both missions and personnel, and it may impact the Navy's ability to comply with DoD anti-terrorism / force protection standards, potentially jeopardizing Navy missions and safety of WNY personnel. Increased building heights, specifically on Parcel E, will result in both permanent new sightlines into the WNY campus and an increase in nearby vehicular and pedestrian traffic. The view directly into the WNY and its facilities may impact the ability to use these facilities to support existing and future missions. Increased traffic without appropriate security stand-off detracts from the Navy's ability to protect from attacks which utilize vehicles and small weapons.

As such, the Navy supports the applicant's text amendment request to Subtitle K, Chapter 2 of the Zoning Regulations with the exception of the following:

a. The Navy requests the height for Parcel E be limited to 90 feet, and not be eligible for an increase in building height to 110 feet with Zoning Commission review, unless the proposed development primarily supports a federal use. If enacted, §203.2 would read as follows:

(1) Sites fronting on M Street, S.E., east of 4th Street, S.E., are restricted to a height of ninety feet (90ft.). A building height of one hundred ten feet (110 ft.) maximum is permitted, ***excluding Parcel E, unless the proposed development primarily supports a federal use***, if reviewed and approved by the Zoning Commission pursuant to the procedures of Subtitle K §241.

b. If the Commission does not agree with the above recommendation, the Navy requests the approval for the increased height be subject to design review by the Navy as a condition of approval. The Zoning Commission has enacted similar conditions of approval in response to the Navy's security concerns in Zoning Case No. 03-12G/ 03-13G.

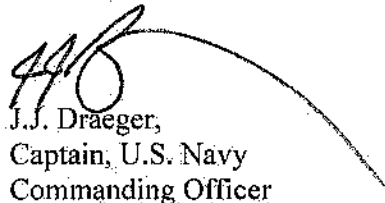
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c. According to §202.2, development for non-residential uses in the SEFC-1-B zone is limited to 3.0 FAR. The developer has indicated on the Proposed Land Use Diagram, included as Exhibit 2B, that Parcel E will not be developed as residential, as Parcel E is labeled for "Office/Cultural" development. E Parcels are further indicated as having no residential development in Exhibit No. 2A, "Existing Zoning-Actual", "New Zoning -Matter of Right" and "New Zoning - with Height/Density Bonuses" tables. The D.C. Office of Planning report, Exhibit 23, also further supports the use of Parcel E for only non-residential development, citing the constraints created by the existing historic structures and the applicant's acknowledgement of the Navy's security concerns. The Navy recommends the proposed non-residential use, and associated 3.0 FAR, for Parcel E be codified in the text amendment, eliminating the 6.0 residential FAR. If enacted, §202.2 would read as follows:

(1) The maximum permitted FAR for buildings in the SEFC-1-B zone shall be 6.0 FAR with a maximum of 3.0 FAR for non-residential uses, *excluding Parcel E, which shall be devoted solely to non-residential use with a maximum of 3.0 FAR*; except a maximum density of 7.0 FAR shall be permitted on Parcels H or I only, if reviewed and approved by the Zoning Commission, pursuant to the standards and procedures of Subtitle K §374 and 421, provided that:
(cont)

In closing, the Navy thanks the Commission for the opportunity to provide input to the proposed text amendment. As a major employer in southeast D.C., the Navy plays an important role in the economic stability of the neighborhood. The SEFC community supports the WNY and its personnel, and the Navy appreciates the amenities provided by SEFC redevelopment. The Navy believes that with these recommended text amendment modifications, the Navy and SEFC can continue to grow together in supporting both the Navy mission and an increasingly vibrant community. The Navy looks forward to working with the D.C. government, GSA and Forest City Washington to find design solutions that will address the Navy's security concerns while supporting compatible development.

Sincerely,


J.J. Draeger,
Captain, U.S. Navy
Commanding Officer

Enclosures: 1. ZC Case No 17-12 Exhibit 2A
2. ZC Case No 17-12 Exhibit 2B
3. ZC Case No 17-12 Exhibit 23

Copy to: Forest City SEFC LLC
Advisory Neighborhood Commission 6D