

December 31, 2025

Andy VanHorn
Head of Real Estate, Washington Commanders
4600 River Rd., Suite 400
Riverdale, MD 20737

Re: Determination Concerning the Compliance of the RFK Campus Stadium
Height Act Concept Plans with the 1910 Height of Buildings Act

Dear Mr. VanHorn:

By letter dated September 4, 2025, I issued a determination regarding the permitted height of the RFK Campus stadium under the 1910 Height of Buildings Act (the "Height Act"). In that letter, I confirmed the following:

- The stadium can achieve a maximum building height of 130 feet based on East Capitol Street right-of-way width.
- The stadium's height will be measured from the Building Height Measuring Point ("BHMP") located at the level of the sidewalk opposite the middle of the front of the stadium on East Capitol Street.
- The Height Act allows a dome to be erected to a greater height than the maximum permitted building height. While the term "dome" is not defined in the Height Act, the Merriam-Webster definition of "dome" includes, among other things, "a roofed sports stadium." Accordingly, the stadium's dome is permitted to exceed the 130-foot building height limitation under the Height Act.

I have reviewed the attached Height Act Concept Plans prepared by HKS dated December 31, 2025 ("Plans") to confirm that the stadium's present conceptual design complies with the Height Act. My understanding is that pursuant to D.C. Law L26-0054 the stadium is not subject to zoning until after such time as a final certificate of occupancy is issued. Accordingly, this letter only evaluates the stadium's compliance with the Height Act.

The proposed conceptual stadium design includes (1) a traditional "seating bowl", which encompasses the field, stadium seating, and all other components of occupied space, surrounded by an exterior wall, all of which are at or below 130 feet, as labelled in gray, orange, and yellow on Page 5 of the Plans, and (2) a "dome structure", which is comprised of a shell, metal fascia, and structural ribs and which is permitted to exceed 130 feet, as labelled in blue on Pages 6-8 of the Plans.

The seating bowl will be surrounded by an exterior wall and is supported by a series of concrete columns. The columns rise to a height that corresponds to the height of the exterior wall at or below the 130-foot height limit. The exterior wall and its supporting columns are shown in yellow and orange on Page 5 of the Plans, and as depicted on that sheet, the exterior wall is recessed in some locations. The seating bowl, including all occupiable space, columns, and exterior wall, has a height of 130 feet or less in compliance with the Height Act.

Above and surrounding the seating bowl is the dome structure that extends above the height limit. The dome structure will be constructed of a series of concrete and steel ribs that support an opaque roof membrane shell that surrounds a transparent roof membrane shell over a free-spanning steel cable structure. This construction is consistent with how dome structures have historically been constructed and modern stadium dome designs. *See* Pages 1 through 3 of the Plans. In this case, the ribs are comprised of two materials: steel ribs are used to support the membrane shell above, and concrete ribs extend to the ground and are used to support the steel ribs and shell above. The shell is connected to the seating bowl's exterior wall through a metal panel fascia. All three components of the dome structure – namely, the shell, fascia, and ribs – are each an integral part of the overall dome structure. The dome structure rests on the concrete columns that support and are a part of the seating bowl, but only the dome structure is above the 130-foot height limit. The concrete columns upon which the dome structure is placed are all at or below 130 feet.

The dome will serve as the roof of the stadium. I have been advised that as a result, the dome will need to contain certain fixtures, such as lighting, air-handling ductwork, scaffolding, walkways, and/or catwalks. Consistent with past interpretations, the presence of such fixtures does not alter the structure's classification as a dome, and it does not render the volume of the dome habitable. In this case, all spaces that support human occupancy, including the seating bowl's exterior wall and structural columns upon which the dome structure is placed, will be at or below the 130-foot height limit. The only element that will extend above 130 feet is the dome structure, which is permitted by the Height Act (*see* D.C. Code § 6–601.05(h) “that such structures when above such limit of height shall be fireproof, and . . . no floor or compartment thereof shall be constructed or used for human occupancy above the top story of the building upon which such structures are placed.”)

For the reasons stated above, I have determined that the current conceptual stadium design, as depicted on the attached Plans, complies with the Height Act. If plans for the stadium submitted with the building permit application are consistent with the Plans, then the plans will be considered compliant with the Height Act.

This determination is the Zoning Administrator's final determination regarding the compliance of the Plans with the Height Act.

Sincerely,

Kathleen A. Beeton

Kathleen A. Beeton, AICP
Zoning Administrator