

May 14, 2026

VIA IZIS

District of Columbia Zoning Commission
Office of Zoning
441 4th Street, NW, Suite 200-S
Washington, DC 20001

Re: **Application of BXP 2100M LLC (the “Applicant”) for Voluntary Design Review for 2100 M Street, NW (Square 72, Lot 75) (the “Property”)**

Dear Chairman Hood and Members of the Commission:

On behalf of the Applicant, enclosed please find an application for review of a new 10-story office building with ground-floor retail (the “**Project**”) for the above-referenced Property. The application is being filed electronically through the Interactive Zoning Information System (“**IZIS**”). The application materials filed online meet the filing requirements detailed in Subtitle Z, Chapter 3 of the Zoning Regulations, and include the following:

- **Exhibit A** Application Form;
- **Exhibit B** Authorization Letter;
- **Exhibit C** List of Property Owners within 200 Feet of the Property;
- **Exhibit D** Certificate of Notice and Notice of Intent;
- **Exhibit E** Architectural Plans;
- **Exhibit F** Surveyor’s Plat;
- **Exhibit G** Comprehensive Plan and Racial Equity Analysis; and
- **Exhibit H** Zoning Map.

A check for the filing fee of \$43,463.16 made payable to DC Treasurer and two sets of pre-printed labels will be sent to the Office of Zoning under separate cover.

Please do not hesitate to contact David at (202) 721-1137 or Lee at (202) 721-1153 if you have any questions regarding the application. Thank you for your attention and we look forward to the Commission’s consideration of the matter at an upcoming public hearing.

Sincerely,

/s/ David M. Avitabile
David M. Avitabile

/s/ Lee S. Templin
Lee S. Templin

Certificate of Service

The undersigned certifies that copies of the foregoing documents will be delivered via electronic mail to the following addresses on May 14, 2026.

Radhika Mohan
Maxine Brown-Roberts
Office of Planning
radhika.mohan@dc.gov
maxine.brownroberts@dc.gov

Erkin Ozberk
District Department of Transportation
erkin.ozberk1@dc.gov

ANC 2A
2A@anc.dc.gov

SMD 2A06; John H. Dolan
2A06@anc.dc.gov

ANC 2B
2B@anc.dc.gov

/s/ Lee S. Templin
Lee S. Templin

**BXP 2100M LLC
2100 M STREET, NW**



**APPLICATION TO THE DISTRICT OF COLUMBIA ZONING COMMISSION
ON BEHALF OF BXP 2100M LLC
FOR VOLUNTARY DESIGN REVIEW**

May 14, 2026

I. Introduction

This application is submitted on behalf of BXP 2100M LLC (the “**Applicant**”) for Zoning Commission review and approval of a 10-story office building with ground floor retail. The property that is the subject of this application is located at 2100 M Street, NW (Square 72, Lot 75) (the “**Property**”). The Property is an irregularly shaped lot located on the west side of 21st Street, NW with M Street, NW to the north and New Hampshire Avenue, NW to the northwest. Duke Ellington Park, a small triangle park, sits directly north across M Street, NW. The Property consists of approximately 41,496 square feet, or 0.95 acres, of land area and is located in the D-5 Zone.

The Applicant submits this application (the “**Application**”) for Voluntary Design Review pursuant to Subtitle X § 601.2 of the District of Columbia Zoning Regulations. Pursuant to Subtitle X § 603.1, the Application requests flexibility from the court, height setback, penthouse setback, and front build-to requirements of the D-5 Zone.

The Property is currently improved with an existing eight-story office building constructed in 1969 in the Brutalist style. The Applicant proposes to raze the existing building and construct a 10-story mixed-use office and retail building containing approximately 334,342 square feet of gross floor area, including approximately 8,742 square feet of ground floor retail (the “**Project**”). The Project is thoughtfully designed to reactivate this important street corner that sits at the intersection of several major avenues. The Project’s design emphasizes connectivity with multiple building entrances and several multi-level terraces to activate the block and enhance the pedestrian experience. As described in detail below, the Project offers superior design intended to meaningfully transform this currently underutilized property situated at a momentous juncture within the L’Enfant Plan.

II. Jurisdiction of the Zoning Commission

The Zoning Commission has jurisdiction to grant Voluntary Design Review approval for the Project pursuant to Subtitle X §§ 601.2, 603.1, and 603.3 of the Zoning Regulations.

III. Description of the Property and the Surrounding Area

The Property is a corner lot located at the intersection of 21st Street, M Street, and New Hampshire Avenue in Ward 2. Anchoring the western edge of the Golden Triangle and the eastern edge of the West End neighborhood, the Property sits at an important juncture in the L’Enfant Plan, where multiple major arteries meet. Punctuated by Duke Ellington Park to the north, an approachable pocket of green space within the urban fabric, the Property is uniquely positioned with high visibility. M Street jogs southward and its bend further creates space, contributing to the prominence of the corner.

The Property connects several downtown neighborhoods with Dupont Circle just a few blocks to the north, Foggy Bottom to the south, the Golden Triangle to the east, and the West End to the west. The Property plays a transitional role between the primarily office uses to the east and primarily hotel and residential uses to the west and to the north. Ground floor retail surrounds the Property, albeit activate retail uses are focused on the western side, whereas several vacant retail spaces sit to the east, indicative of the current distressed state of retail downtown.

To the east of the Property is Lafayette Centre, a medical office complex, with a pedestrian connection that runs through the block from 20th Street to 21st Street. Hotel uses predominate to the north and to the west of the Property – St. Gregory sits to the northeast, the Concordia sits to the north beyond Duke Ellington Park, and the Hyatt, the Washington Marriot, Yours Truly, and the Ritz-Carlton are located to the west. Ground floor retail to the north and west includes fast casual restaurants, such as Tatte, Call Your Mother, and Wonder, as well as sit-down restaurants, including Planta and Rasika.

The site’s prow-like geometry offers an opportunity to activate the pedestrian realm surrounding the Property, supporting the existing nearby retail and creating a special moment where the West End neighborhood meets Downtown. With care, the Project will knit together these uses and create a dynamic destination to draw passersby into Downtown. As Downtown DC undergoes a transformation from primarily office use to a mix that includes residential, this once-underwhelming property will serve a dual purpose of exemplifying high quality office and retail space while also activating the surrounding blocks with a light-filled design that emphasizes connectivity.

IV. Description of the Applicant

The Applicant is an affiliate of BXP (“**BXP**”). Founded in Boston, BXP has been operating for over 50 years and has played an instrumental role in shaping the District. Recent office developments of BXP include 2100 Pennsylvania Avenue, 2200 Pennsylvania Avenue, 901 New York Avenue, 601 Massachusetts Avenue, and 725 12th Street. Between DC, Northern Virginia, and Maryland, BXP has developed approximately 8.8 million square feet across 30 properties with an occupancy rate of approximately 91.3%. The Property is BXP’s latest acquisition in the District and they have teamed with Pickard Chilton to craft a signature trophy office space.

V. Project Description

The Applicant acquired the Property in late 2025 and has pre-leased approximately 75% of the Project to the global law firm, Sidley Austin LLP (“**Sidley**”). The Property anchors the western edge of the Golden Triangle and the Project’s design intends to finally fulfill the role of this site’s important position downtown. The design emphasizes connectivity, creating an active dialogue between the Project’s numerous multi-level terraces and the surrounding pedestrian and

vehicular network. The design holds off on both edges of the building in order to bring in light and air. These side setbacks, along with the step down of the roofline, necessitate the requested zoning flexibility, which enables a superior design to enliven this pivotal corner.

The Applicant plans to raze the existing building to enable an entire re-visioning of the uniquely shaped corner lot. As shown in the plans and drawings attached hereto as Exhibit E (the “**Plans**”), the Project consists of a 10-story office building with approximately 8,742 square feet of ground floor retail. The massing steps back at the sides and from the top. The Applicant intentionally scaled the Project back from its matter-of-right massing potential in order to create space for light and air and a more intriguing façade, foregoing approximately 40,000 square feet of additional density. Although 11 floors would be possible, the Applicant favored a 10-floor stack to break down the massing and make the building fit more comfortably within the cityscape. The Project will alleviate the existing building’s dead wall conditions in favor of a vibrant façade that transforms this anchor site.

The Project is designed to finally fulfill the site’s important position. With its primary entrance at the north, the design ensures that the prow of the building holds the space and transforms this prominent corner. The ground floor retail intends to activate the park to the north and complement the nearby restaurant uses, creating a vibrant retail zone. The office lobby entrance will sit on the 21st Street side, which is historically less active. The length of the 21st Street block is unusually long compared to adjoining blocks, measuring at approximately 650 feet, inclusive of the triangle park to the north, compared with the approximately 400- and 500-foot widths of the adjacent blocks. The mid-block lobby is intended to break down this lengthy 21st Street façade.

The design creates a vibrant street edge with opportunities for public space such that the lobby and retail areas will engage in active dialogue with the surrounding streets. The Project will shrink the existing curb cut along 21st Street with the ramp to below-grade parking and loading. The Project’s design incorporates greenery not only along the perimeter of the building, but at each terrace and the penthouse, creating a lively and green corner. The Applicant anticipates a potential restaurant use for all or a portion of the ground floor retail space with a sidewalk café, subject to approval by the Public Space Committee, which will further activate the block and complement the adjacent park space.

The Applicant plans to commence construction in 2028 and deliver the Project by 2031.

VI. Zoning Parameters and Flexibility for the Project

The Project will be constructed to a FAR of 8.1, allowable through Transferable Density Rights (“**TDR**”) credits. However, flexibility is requested from the height setback, penthouse setback, court, and front build-to requirements, pursuant to Subtitle X § 603.1. The flexibility

requested will enable a better and more efficient design of the Project with the goal of maximizing the light and air that reaches the new building.

The Applicant requests flexibility from the requirement that the height be set back at a 45-degree angle from the matter-of-right 90-foot maximum height permitted in the abutting MU-10 Zone. 11-I DCMR §§ 201.6(b); 540.5. The Property is unique in that it is one of only several properties in the District subject to this requirement. The Project will step back from the abutting MU-10 Zone to the west, but the setback is articulated by floor rather than a continuous plane. The breakdown in massing will allow additional light and air to reach the internal courtyard at the center of the block. The flexibility is necessary to permit a rational floor plate for office use. Compliance with the setback would create issues with the building's core and result in shallow single-loaded corridors especially at the upper stories.

The Applicant further requests flexibility from the penthouse setback requirements of Subtitle C § 1504.1 for a guardrail on the uppermost roof deck. The building design features an angular point at the intersection of M Street and 21st Street, which responds to the bend in M Street at this intersection. The design team has recessed the façade of the upper floors of the building at this point to create a tower-like element that helps to break up the building mass and accentuate this corner. The roof extends over this façade setback to follow the property line, and the Applicant proposes to set back the guardrails 1:1 from the edge of the roof, rather than from the point where the vertical wall intersects with the roof. The flexibility allows the Applicant to create the architectural move on the building facades without having to create an unnatural and artificial jog in the guardrails on the roof terrace that will reduce the occupiable outdoor area.

The Applicant requests flexibility from the front-build to requirements of Subtitle I § 203.1 for a portion of the building façade along New Hampshire Avenue that steps back six feet from the property line. The purpose of this indentation is, again, to maximize light and air that reaches both the building and the abutting properties. The existing building likewise steps back at this frontage, allowing space for an opening at the entrance of the abutting building, currently occupied by Call Your Mother Deli. The setback honors this historical floorplate with a respectful gesture to the Property's neighbor.

Finally, the Applicant requests flexibility from the court width requirements of Subtitle G § 207.1 for several courts at various levels. These courts permit additional light and air to reach the center of the block and the abutting buildings. With an emphasis on activation, the courts further the Project's design goals of engaging with the surrounding pedestrian and vehicular network, creating a truly engaging façade.

In addition to zoning flexibility, the Applicant requests flexibility to relocate the long-term bicycle parking from the ground floor to the first below-grade level, in accordance with the long-term bicycle parking location requirements of Subtitle C § 805.

VII. This Application Satisfies the Burden of Proof for Voluntary Design Review

To obtain Voluntary Design Review approval, including flexibility for court, height, and setbacks pursuant to Subtitle X § 603.1, the application must satisfy the Voluntary Design Review requirements set forth in Subtitle X §§ 601 and 604. This application satisfies the requirements for such approval, as described in more detail below.

A. The Application Satisfies the Applicability Requirements for Voluntary Design Review in Subtitle X § 601

Pursuant to Subtitle X § 601.3, there is no minimum area required for a Voluntary Design Review application in the D-5 zone. In addition, under Subtitle X § 601.4, all the property included in a Voluntary Design Review application is required to be contiguous or separated only by a public street, alley, or right-of-way. In this case, the entire Property is a single parcel and meets the contiguity requirements.

B. The Application Satisfies the Standards for Design Review in Subtitle X § 604

1. The Proposed Project Will Not Be Inconsistent with the Comprehensive Plan. (11-X DCMR § 604.5)

The Project will not be inconsistent with the Comprehensive Plan, including when viewed through a racial equity lens, as further explained in the analysis attached hereto as Exhibit G.

2. Street frontages are designed to be safe, comfortable, and encourage pedestrian activity, including: (1) Multiple pedestrian entrances for large developments; (2) Direct driveway or garage access to the street is discouraged; (3) Commercial ground floors contain active uses with clear, inviting windows; (4) Blank facades are prevented or minimized; and (5) Wide sidewalks are provided. (11-X DCMR § 604.7(a))

The design team has taken advantage of the Property's multiple street frontages and provided several building entrances to activate the surrounding streets. The primary office lobby will be located along 21st Street and a secondary entrance located to the rear on the New Hampshire Avenue frontage will provide access from the west. The main entrance of the building will be located at the northern corner of the building where the ground floor retail sits. This entry and the retail space are intentionally positioned at the north of the site to activate the intersection of 21st Street, M Street, and New Hampshire Avenue, as well as Duke Ellington Park. The Project will maintain the existing garage entrance on 21st Street, but will downsize the existing curb cut, enhancing pedestrian safety.

The design purposefully avoids blank façades, incorporating outdoor terraces at various levels so as to highlight the building's activity and establish communication with the surrounding pedestrian and vehicular network. The clear, tall glass façade at the ground floor will further strengthen the building's dialogue with the surrounding network. The existing building's dark arcade will dramatically transform into a ground floor of brightness and activity.

The design incorporates landscaping surrounding the building and will maintain thoughtfully designed wide sidewalks. The Applicant anticipates a potential sidewalk café with the ground floor retail space.

3. Public gathering spaces and open spaces are encouraged, especially in the following situations: (1) Where neighborhood open space is lacking; (2) Near transit stations or hubs; and (3) When they can enhance existing parks and the waterfront. (11-X DCMR § 604.7(b))

The Project incorporates ample gathering spaces, including amenity space on the ground floor, common areas on each floor, and amenity space on the penthouse level. In addition, numerous terraces punctuate the façade, creating a dialogue between different levels. These terraces will provide outdoor open space for tenants and activate the long 21st Street frontage. In addition, the Project has been designed with a cascading roof line to allow additional light and air to reach the interior courtyard abutting the Property at the rear.

The Project will improve the public space surrounding the building with attractive streetscape materials, as well as plantings, in line with the District Department of Transportation's ("DDOT") public space permitting process.

4. New development respects the historic character of Washington's neighborhoods, including: (1) Developments near the District's major boulevards and public spaces should reinforce the existing urban form; (2) Infill development should respect, though need not imitate, the continuity of neighborhood architectural character; and (3) Development should respect and protect key landscape vistas and axial views of landmarks and important places. (11-X DCMR § 604.7(c))

The Property sits at an important moment in the L'Enfant Plan. With the nexus of three major avenues and at the juncture of the West End, Dupont Circle, and Downtown neighborhoods, the Property's prominent location cannot be overstated. The triangle park to the north creates a wedge in the grid and its open space further highlights the Property, leaving room for a true statement piece of urban design. The Applicant has embraced the Property's corner positioning and crafted a design that thoughtfully knits together the urban fabric with an intriguing façade and intentional breaks in the massing to bring in light and air. With deep respect for the L'Enfant Plan and the Property's important position, the Project creates space for the urban form and respects its

position as a key vista by creating numerous opportunities for dialogue with the surrounding network.

Despite limited streetscaping surrounding the Property, the Project engages with the public realm through multi-level terraces and breaks from the abutting buildings. The podiums and multi-level terraces will demonstrate the building's activity from the vantage point of the surrounding streets.

The Project complements the surrounding architectural character with the same general materiality and architectural massing. The design team has incorporated glass, stone, terracotta, and textured metal to echo both the masonry character of the building to the northwest and Lafayette Centre to the east as well as the surrounding office and lodging uses that tend towards a more modern style.

5. Buildings strive for attractive and inspired façade design, including: (1) Reinforce the pedestrian realm with elevated detailing and design of first (1st) and second (2nd) stories; and (2) Incorporate contextual and quality building materials and fenestration. (11-X DCMR § 604.7(d))

As shown on the Plans, the Project provides an attractive, activated ground-floor façade with floor-to-ceiling windows and a view inside the building, emphasizing dialogue with the surrounding pedestrian and vehicular network. The anchor tenant, Sidley, helped guide the design process, striving for a truly signature building.

The materiality incorporates glass, stone, terracotta, and textured metal, complementing the surrounding buildings, as described above. The design intends to be a “good neighbor,” enhancing the adjacent park and the existing retail nearby. The previously vacant and underwhelming building will be transformed with activity. The office tenants will provide a new supply of patronage to the surrounding existing businesses and the new ground floor retail space will activate the park.

As discussed above, the design incorporates numerous podiums or sky terraces, adding articulation to the façade. The stepping back of the roof and the space at each end of the building shapes the massing to maximize light and air reaching the building and the interior courtyard at the center of the block. The design intentionally creates both horizontal and vertical connectivity such that there is no “B” side to the Project. Rather, each street frontage thoughtfully engages with the pedestrian realm.

6. Sites are designed with sustainable landscaping. (11-X DCMR § 604.7(e))

As shown on the Plans, the Project includes extensive sustainable landscaping. The project team will continue working with the Office of Planning (“OP”), DDOT, and the

Department of Energy and the Environment (“DOEE”) to ensure the Project’s landscaping enhances the vibrancy and sustainability of and surrounding the Project. The penthouse and multi-level terraces incorporate an intensive green roof. The Project will meet the minimum required Green Area Ratio (“GAR”) of 0.20.

- 7. Sites are developed to promote connectivity both internally and with surrounding neighborhoods, including: (1) Pedestrian pathways through developments increase mobility and link neighborhoods to transit; (2) The development incorporates transit and bicycle facilities and amenities; (3) Streets, easements, and open spaces are designed to be safe and pedestrian friendly; (4) Large sites are integrated into the surrounding community through street and pedestrian connections; and (5) Waterfront development contains high quality trail and shoreline design as well as ensuring access and view corridors to the waterfront. (11-X DCMR § 604.7(f))**

The Property’s critical location at the intersection of several major streets and neighborhoods makes connectivity an important design feature that the project team has considered at length. The Project promotes connectivity through its three building entrances at each street frontage, maximizing accessibility around and through the site. The two office entrances connect 21st Street on the east to New Hampshire Avenue on the west, allowing tenants to enter from either direction. The retail is purposefully positioned with its entrance on the north side of the Project to maximize accessibility from the three major thoroughfares and the adjacent triangle park.

Across 21st Street to the east, Lafayette Centre includes a center-block pedestrian pathway that ends at the southeastern corner of the Property. The Project is designed to meet that pedestrian path with the main office lobby just to the north, drawing pedestrians northward toward the central retail space.

The Project will provide at least 12 short-term and 97 long-term bicycle parking spaces. The Applicant’s transportation consultant, Wells + Associates, is coordinating with DDOT to develop an appropriate Transportation Demand Management (“TDM”) Plan and Loading Management Plan.

C. The Application Satisfies the General Special Exception Requirements

Pursuant to Subtitle X § 604.6, the Zoning Commission must find that the application meets the general special exception requirements of the Zoning Regulations. The application satisfies these requirements as follows.

1. The Proposed Design is in Harmony with the General Purpose and Intent of the Zoning Regulations and Zoning Maps.

The Project is in harmony with the general purpose and intent of the Zoning Regulations and the Zoning Map. The D-5 Zone is intended to promote high-density development of commercial and mixed uses in areas that were traditionally receiving areas for TDRs under the 1958 Zoning Regulations. 11-I DCMR § 538.1. The Property benefits from approximately 105,000 square feet of TDRs. Despite its prominent location, the Property has been underutilized for years. The Project will enhance the pedestrian and retail vibrancy of the area, revitalizing the important intersection.

The Applicant’s request for zoning flexibility from the height setback, front setback, and court requirements is in harmony with the general purpose and intent of the Zoning Regulations. The requested zoning flexibility creates space within the Project’s design to allow additional light and air to reach the Project and also the abutting properties. The Applicant intentionally positioned the retail, as opposed to the office lobby, at the more visible northern corner of the Property with the intent to activate the surrounding pedestrian realm. The Project will anchor this important corner with transformative architecture that engages with the surrounding cityscape.

2. The Proposed Building will not Affect Adversely the Use of Neighboring Property in Accordance with the Zoning Regulations and Zoning Maps.

The Project is consistent with the scale and density of the surrounding buildings and fits appropriately within the context of the West End and Downtown neighborhoods. As described above, the design intentionally foregoes the maximum permitted building envelope in favor of space that enhances the light and air that flows through the Project. The Applicant will supplement the record with a Transportation Statement, prepared by the traffic consultant, Wells + Associates, to describe any traffic impacts on the surrounding network. Importantly, the Project will reduce the size of the existing curb cut on 21st Street, enhancing pedestrian safety around the perimeter of the Property.

VIII. Exhibits

The following exhibits are attached to this submission:

Exhibit A	Application Form
Exhibit B	Authorization Letter
Exhibit C	Property Owner List
Exhibit D	Certificate of Notice

Exhibit E	Architectural Plans
Exhibit F	Surveyor's Plat
Exhibit G	Comprehensive Plan and Racial Equity Analysis
Exhibit H	Zoning Map

IX. Conclusion

For the foregoing reasons, the Applicant requests that the Commission approve the Project per the Voluntary Design Review standards to permit flexibility from the court, height setback, and front build-to requirements. We look forward to presenting this application to the Commission at the public hearing.

Respectfully,

/s/ David M. Avitabile
David M. Avitabile

/s/ Lee S. Templin
Lee S. Templin

EXHIBIT A



BEFORE THE ZONING COMMISSION
FOR THE DISTRICT OF COLUMBIA



FORM 100 – APPLICATION SIGNATURE PAGE

All Zoning Commission applications shall be filed through the Interactive Zoning Information System (IZIS). Pursuant to Subtitle Z §§ 300.5, 301.4, and 302.4, please use Form 100 to provide the name(s), address(es), and signature(s) of each owner of property included in the area to be developed, or of the owner's authorized agent.

PUD: 1st Stage 2nd Stage Consolidated

Modification: Minor Consequence Significance

Map Amendment

Design Review

Campus Plan

Time Extension

I/We hereby certify that the information contained on the application for the relief filed with the Zoning Commission is true and correct to the best of my/our knowledge, information, and belief. Any person(s) using a fictitious name or address and/or knowingly making any false statement on this application/petition is in violation of D.C. Law and subject to a fine of more than \$1,000 or 180 days' imprisonment or both. (D.C. Official Code § 22 2405.)

Owner's Name: BXP 2100M LLC

Owner's Address: c/o BXP, 901 New York Avenue, NW, Suite 600E, Washington, DC 20001

Owner's Signature: *[Handwritten Signature]* * Authorized Agent

Date: 5/14/26

Owner's Name:
Owner's Address:
Owner's Signature: Date:

Owner's Name:
Owner's Address:
Owner's Signature: Date:

Owner's Name:
Owner's Address:
Owner's Signature: Date:

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Owner's Address:
Owner's Signature: Date:

Owner's Name:
Owner's Address:
Owner's Signature: Date:

Owner's Name:
Owner's Address:
Owner's Signature: Date:

Owner's Name:
Owner's Address:
Owner's Signature: Date:

ANY APPLICATION THAT IS NOT COMPLETED IN ACCORDANCE WITH THE INSTRUCTIONS ON THIS FORM WILL NOT BE ACCEPTED.

EXHIBIT B



800 Boylston Street, Suite 1900
Boston, MA 02199

617.236.3300
www.bxp.com

Boston Properties, Inc.
(NYSE: BXP)

May 7, 2026

Anthony J. Hood, Chairman
Zoning Commission for the District of Columbia
441 Fourth Street, NW, Suite 200S
Washington, DC 20001

Boston

Re: BXP 2100M LLC – Voluntary Design Review Application
(“Application”) for 2100 M Street, NW (Square 72, Lot 75) (the
“Property”) – Letter of Authorization

Los Angeles

New York

Dear Chairman Hood and Members of the Commission:

San Francisco

By this letter, BXP 2100M LLC, the owner of the Property, hereby authorizes the law firm of Goulston & Storrs PC to represent it in all matters before the Zoning Commission concerning the above-referenced Application.

Seattle

Washington, DC

Sincerely,
BXP 2100M LLC

By: 

Name: Matthew J. Bonitart

Title: VP Development

EXHIBIT C

NAME AND MAILING ADDRESS OF THE OWNERS OF ALL PROPERTY WITHIN 200 FEET IN ALL DIRECTIONS FROM ALL BOUNDARIES OF THE PROPERTY INVOLVED IN THE APPLICATION

<u>SQUARE</u>	<u>LOT</u>	<u>PREMISES ADDRESS</u>	<u>OWNER AND MAILING ADDRESS</u>
70	195	1200 NEW HAMPSHIRE AVE NW	BSREF 1200 NEW HAMPSHIRE LLC 250 VESEY ST # 15TH FLOOR NEW YORK, NY 10281-1052
71 71	2001 2002	1177 22ND ST NW, UNIT C-1 1177 22ND ST NW, UNIT C-2	TBRC LLC ATTN: PAUL GUZZARDO # KAFELEOPOLD 3315 CADYS ALLEY NW WASHINGTON DC 20007-3572
71	2003- 2094	1177 22ND ST NW	PRESIDENT / DIRECTOR CONDOMINIUM ASSOCIATION 1177 22ND ST NW WASHINGTON DC 20037-1253
72	6	1121 NEW HAMPSHIRE AVE NW	GEORGETOWN SUITES LLC 1121 NEW HAMPSHIRE AVE NW WASHINGTON DC 20037-1522
72	7	1129 NEW HAMPSHIRE AVE NW	DISTRICT OF COLUMBIA 3924 MINNESOTA AVE NE FLOOR 6 WASHINGTON, DC 20019-2661
72	74	1143 NEW HAMPSHIRE AVE NW	BSREP II DUPONT CIRCLE LLC 250 VESEY ST # 15 TH FLOOR NEW YORK, NY 10281-1052
72	76	2101 L ST NW	2101 L STREET LLC 7114 E STETSON DRIVE #240 SCOTTSDALE, AZ 85251-3248
72	858	1101 NEW HAMPSHIRE AVE NW	DAVID HORNSTEIN GELMAN MANAGEMENT CO 2120 L ST NW STE 800 WASHINGTON DC 20037-1549
72	2001	1117 NEW HAMPSHIRE AVE NW Unit: T1	ELAINE JOHN RIGAS TRUSTEE 2039 NEW HAMPSHIRE AVE NW WASHINGTON DC 20009-3414
72	2002	1117 NEW HAMPSHIRE AVE NW Unit: 1	ANGEL DONCHEV 3032 DENT PLACE NW WASHINGTON DC 20007-2915
72	2003	1117 NEW HAMPSHIRE AVE NW Unit: 2	SHANKER K PATEL 6912 ELM ST MC LEAN VA 22101-2826
72	2004	1117 NEW HAMPSHIRE AVE NW Unit: 3	ASHLEIGH WATSON 955 26TH ST NW APT 605 WASHINGTON DC 20037-2040

72	2005	1117 NEW HAMPSHIRE AVE NW	DONATO ALVAREZ &
72	2008	Unit:4	MARISA C ALVAREZ TRUSTEES
		1117 NEW HAMPSHIRE AVE NW Unit:	1117 NEW HAMPSHIRE AVE NW,
		7	WASHINGTON DC 20037-1500
72	2006	1117 NEW HAMPSHIRE AVE NW Unit:	ANNA REVA
		5	1117 NEW HAMPSHIRE AVE NW, UNIT 5
			WASHINGTON DC 20037-1500
72	2007	1117 NEW HAMPSHIRE AVE NW Unit:	ERNESTO D. LOPEZ LAYUG & MARIE A.
		6	VILLANUEVA
			1117 NEW HAMPSHIRE AVE NW, UNIT 6
			WASHINGTON DC 20037-1553
72	2009	1117 NEW HAMPSHIRE AVE NW Unit:	MALORIE E LETCAVAGE
		8	1117 NEW HAMPSHIRE AVE NW APT 8
			WASHINGTON DC 20037-1553
72	2010	1117 NEW HAMPSHIRE AVE NW Unit:	VIJO CHERIAN
		9	1117 NEW HAMPSHIRE AVE NW, APT 900
			WASHINGTON DC 20037-1500
99	52	2033 M ST NW	DELLINGTON PROPERTIES LLC
			1156 15 TH STREET NW
			SUITE 605
			WASHINGTON, DC 20005-1767
100	118	1155 21ST ST NW	LCPC LAFAYETTE PROPERTY LLC
100	119	1133 21ST ST NW	200 STATE ST STE 5 FL 5YH
100	7002	20TH ST NW	BOSTON MA 02109-2628
100	905	2020-2030 M ST NW	2020 M STREET LLC
100	7003-7005	2020-2030 M ST NW	45 ROCKEFELLER PLZ # 7
			NEW YORK NY 10111-0100
100	7009	2020-2030 M ST NW	
100	7014	2020-2030 M ST NW	
100	7015	2020-2030 M ST NW	
100	906	2020-2030 M ST NW	2030 M STREET LLC
100	7006-7008	2020-2030 M ST NW	45 ROCKEFELLER PLZ # 7
			NEW YORK NY 10111-0100
100	7010	2020-2030 M ST NW	
100	2006	2055 L ST NW, VU401	VERIZON WASHINGTON DC INC
100	2007	2055 L ST NW, VU301	899 HEATHROW PARK LN
100	2008	2055 L ST NW, VU201	LAKE MARY, FL 32746-5612
100	2009	2055 L ST NW, VU101	
100	2010	2055 L ST NW, VU001	
100	2011	2055 L ST NW, # 100	ARN 2055 LLC
100	2015	2055 L ST NW, #800	NATIONAL RESTAURANT ASSOCIATIO
100	2018	2055 L ST NW, #701	233 S WACKER DR STE 3600
			CHICAGO IL 60606-6383

100	2016	2055 L ST NW, #500	CENTER FOR GLOBAL DEVELOPMENT 2055 L ST NW FL 5 WASHINGTON DC 20036-4983
100	2017	2055 L ST NW, #600	THE ENDOCRINE SOCIETY 8401 CONNECTICUT AVE STE 900 CHEVY CHASE MD 20815-5817
100	2019	2055 L ST NW, #702	NATIONAL RESTAURANT ASSOCIATION EDUCATIONAL FOUNDATION 233 S WACKER DR STE 3600 CHICAGO IL 60606-6383
RES	140		MS. TAMMY STIDHAM NATIONAL PARK SERVICE US GOVERNMENT PROPERTY 1100 OHIO DRIVE SW WASHINGTON DC 20242-0001
			ANC 2A C/O WEST END LIBRARY 2301 L STREET NW WASHINGTON DC 20037
			ANC 2B 9 DUPONT CIRCLE NW WASHINGTON DC 20036

EXHIBIT D

CERTIFICATE OF NOTICE

I HEREBY CERTIFY that a copy of the Notice of Intent to File a Zoning Application (the “**Notice**”) for an application for Voluntary Design Review (the “**Application**”) for BXP 2100M LLC (the “**Applicant**”) to authorize construction of a new 10-story office building with ground-floor retail (the “**Project**”) was mailed to Advisory Neighborhood Commission (“**ANC**”) 2A, ANC 2B, and to the owners of all property within 200 feet of the perimeter of the subject property on March 10, 2026, at least 45 calendar days prior to the filing of this application as required by Subtitle Z § 301.6 of the Zoning Regulations of the District of Columbia. A copy of the Notice is attached hereto.

The Applicant presented the Application to ANC 2A on April 15, 2026 and held a special community meeting regarding the Project on April 27, 2026. The Applicant has been in contact with ANC 2B and plans to present the Application to ANC 2B at a forthcoming meeting.

The Applicant will continue to consider and address comments from the community and agencies throughout the application process.

/s/ Lee S. Templin
Lee S. Templin

NOTICE OF INTENT TO FILE A ZONING APPLICATION
APPLICATION TO THE DISTRICT OF COLUMBIA ZONING COMMISSION FOR
VOLUNTARY DESIGN REVIEW

March 10, 2026

BXP 2100M LLC (the “**Applicant**”) gives notice of its intent to file an application for voluntary design review for the parcel known as Lot 75 in Square 72 (the “**Property**”). The Property is located at 2100 M Street, NW in Ward 2 and consists of approximately 41,196 square feet, or approximately 0.95 acres, of land area.

The Property is bounded by 21st Street, NW to the east, M Street, NW to the north, New Hampshire Avenue, NW to the northwest, an office building to the south, and a hotel to the west. To the north of the Property, across M Street, NW, is Duke Ellington Park. The Property is located in the D-5 Zone and designated High Density Commercial on the Comprehensive Plan Future Land Use Map.

In this application, the Applicant proposes to raze the existing building located on the Property and construct a 10-story building containing approximately 345,000 square feet of gross floor area, including approximately 8,500 square feet of ground floor retail (the “**Project**”). The Project has a maximum height of 130 feet plus a habitable penthouse. Vehicular access to the Property will be provided from 21st Street, NW and the Project will include approximately 258 vehicle parking spaces. In the forthcoming application, the Applicant anticipates requesting flexibility from the court and height setback requirements of the D-5 Zone, as well as other potential flexibility or relief to be identified in the zoning application.

The Project is located within Advisory Neighborhood Commission (“**ANC**”) 2A. Pursuant to Subtitle Z, Section 301.8 of the Zoning Regulations, the Applicant and its development team will request an opportunity to present the Project to ANC 2A in the near future. The Applicant will also reach out to representatives of ANC 2B, as the Property is within 200 feet of the boundary of ANC 2B. A representative of the Applicant is available to discuss the proposed development with all interested and affected groups and individuals.

The design review application for the Project will be filed with the District of Columbia Zoning Commission pursuant to Subtitle X, Chapter 6 and Subtitle Z, Section 301 of the Zoning Regulations, not less than 45 days from the date of this notice, which is given pursuant to Subtitle Z, Sections 301.6 and 301.7 of the Zoning Regulations. The project architects are Pickard Chilton and Kendall/Heaton Associates. The transportation consultant is Wells + Associates. Land use counsel for the Applicant is Goulston & Storrs. If you require additional information regarding the Project or the proposed design review application, please contact David Avitabile at 202-721-1137 or Lee Templin at 202-721-1153.

EXHIBIT E



2100 M Street, NW
Washington, D.C. 20037

Voluntary Design Review

PICKARD CHILTON

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2100 M St. NW
Washington, D.C. 20037

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TITLE SHEET

PROJECT: 2530
DATE: May 2026
SCALE:

SHEET NUMBER:

VDR A0.00

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DETAILED SITE PLAN LOCATION AND EXTERNAL DIMENSIONS OF BUILDING	SHEET NUMBER A1.01
UTILITIES	C
WALKWAYS AND DRIVEWAYS	C
DETAILED LANDSCAPING AND GRADING PLAN	
ARCHITECTURAL PLANS, SECTIONS, AND ELEVATIONS BUILDING FLOOR PLANS	A2.01 - A2.12
CONTEXT ELEVATIONS BUILDING ELEVATIONS	A3.01 A3.11 - A3.12
BLOCK SECTIONS BUILDING SECTIONS	A3.01 - A3.02 A3.21 - A3.22
BUILDING AXONOMETRICS	A4.01 - A4.04
ENCLOSURE DRAWINGS	A4.11 - A4.12
CIRCULATION PLAN DRIVEWAYS AND WALKWAYS, INCLUDING WIDTHS, GRADES AND CURB CUTS	A, C
DETAILED PARKING PLANS	A2.B1 - A2.B3
NUMBER OF PARKING SPACES AND LOADING BERTHS	A0.02
OTHER INFORMATION SITE CONTEXT IMAGES PERSPECTIVE RENDERINGS	A0.06 - A0.07 A9.01 - A9.04

ZONING DATA

PROJECT ADDRESS 2100 M STREET NW
 ZONE DISTRICT D-5
 SQUARE, SUFFIX, LOT SQUARE 0072, LOT 0076
 LAND AREA (SF) 41,496 SF

LOT OCCUPANCY
 DCMR 11 SUBTITLE I, SECTION 202.1
 ALLOWED: 41,496 SF (100%)
 PROPOSED: 39,752 SF (95.7%)

BUILDING HEIGHT
 DCMR 11 SUBTITLE I, SECTION 540.1
 ALLOWED: 130FT PLUS 20FT PENTHOUSE
 PROPOSED: 130FT PLUS 20FT PENTHOUSE

GROSS FLOOR AREA TABULATION

LEVEL	(GFA)
10	31,255
09	31,282
08	33,784
07	33,784
06	33,784
05	33,784
04	33,763
03	33,763
02	32,919
01	36,224
TOTAL	334,342

FLOOR AREA RATIO
 DCMR 11 SUBTITLE I, SECTION 539.3
 ALLOWED: 6.5 FAR (NONRESIDENTIAL)
 9.05 FAR (WITH DENSITY CREDITS VESTED
 IN PROPERTY*)
 PROPOSED: 8.1 FAR

* 105,000 SQ FT OF DENSITY CREDITS TRANSFERRED TO
 PROPERTY PURSUANT TO INSTR. NO. 2008019718

PENTHOUSE GFA
 DCMR 11 SUBTITLE C, SECTION 1505.1
 ALLOWED: 0.4 x 41,496 SF = 16,598 GFA
 PROPOSED: 14,203 GFA
 *10,274 HABITABLE PENTHOUSE AREA

GREEN AREA RATIO
 DCMR 11 SUBTITLE I, SECTION 208.1
 REQUIRED: 0.20 MIN
 PROPOSED: 0.20 MIN

STREETFRONT
 DCMR 11 SUBTITLE I, SECTION 203.1
 MINIMUM 75% OF BUILD-TO REQUIREMENT WITHIN
 4FT OF PROPERTY LINE UP TO HEIGHT OF AT LEAST
 15FT (APPLICABLE FOR ANY ABUTTING STREETS
 NAMED FOR U.S. STATES)

* FLEXIBILITY REQUESTED TO ALLOW FOR SETBACK FROM
 PROPERTY LINE TO BE INCREASED TO 6FT ON NEW
 HAMPSHIRE AVENUE

REAR YARD
 DCMR 11 SUBTITLE I, SECTION I-205.2
 A REAR YARD NEED NOT BE PROVIDED FOR A THROUGH LOT,
 INCLUDING A LOT FRONTING ON THREE OR MORE STREETS

CLOSED COURT
 NONE REQUIRED; IF PROVIDED, 2.5" PER FT OF HEIGHT, 12' MIN.

* FLEXIBILITY REQUESTED

SIDE YARD
 DCMR 11 SUBTITLE I, SECTION 206.1
 NONE REQUIRED; IF PROVIDED, MUST BE AT LEAST 4FT WIDE

NONE PROVIDED

ZONING PARKING REQUIREMENT

DCMR 11 SUBTITLE C, SECTION 701.5 & 702.1
OFFICE 0.5 SPACES PER 1K SF IN EXCESS OF 3K SF
 = 0.5 * (336K SF - 3K SF) = 167 SPACES REQUIRED

*OFFICE GFA CALCULATED AS BUILDING GFA - RETAIL GFA +
 HABITABLE PENTHOUSE AREA.
 (334,342 SF - 8,742 SF + 10,274 SF = 335,874 SF = 336K OFFICE GFA)

RETAIL 1.33 SPACES PER 1K SF IN EXCESS OF 3K SF
 = 1.33 * (8.8K SF - 3K SF) = 8 SPACES REQUIRED

PARKING PROVIDED

LEVEL	STD (9'X18')	TANDEM	ADA (9'X18')	CMPCT (8'X16')	TOTAL
B1	26	10	07	09	52
B2	86	06	00	06	98
B3	86	08	00	06	100

TOTAL	198	24	07	21	250

*CURRENT PLANNED SPACES = 250; FINAL 250 +/- 5%
 ** FLEXIBILITY REQUESTED TO MODIFY NUMBER & DISTRIBUTION OF PARKING TYPES
 PROVIDED DURING DEVELOPMENT OF DESIGN

COMPACT SPACES
 ALLOWED: MAX 49% OF TOTAL (SECTION 712.3)
 PROVIDED: 21 COMPACT SPACES / 250 TOTAL = 8.4%

ADA SPACES
 ADA SECTION 208.2
 REQUIRED: 5 STANDARD PLUS 2 VAN ACCESSIBLE
 PROVIDED: 5 STANDARD PLUS 2 VAN ACCESSIBLE
 ALL LOCATED ON B1 LEVEL

BICYCLE PARKING
 DMCR 11 SUBTITLE C, SECTION 802.1
OFFICE - LONG TERM
 REQUIRED: 96 1 BIKE PER 2,500 GSF (FOR FIRST 50);
 PROPOSED: 96 1 BIKE PER 5,000 GSF (AFTER FIRST 50)

OFFICE - SHORT TERM
 REQUIRED: 09 1 BIKE PER 40,000 GSF
 PROPOSED: 09

RETAIL - LONG TERM
 REQUIRED: 01 1 BIKE PER 10,500 GSF
 PROPOSED: 01

RETAIL - SHORT TERM
 REQUIRED: 03 1 BIKE PER 3,500 GSF
 PROPOSED: 03

SHOWERS / LOCKER FACILITY
 >25,000 SF: (MIN. x 2 SHOWERS); PLUS 2 SHOWERS PER
 ADDITIONAL 50,000 SF, MAX. 6 SHOWERS
 SHOWERS REQUIRED: 06
 SHOWERS PROVIDED: 06

OF LOCKERS = LONG TERM PARKING * 0.6
 LOCKERS REQUIRED: 59
 LOCKERS PROVIDED: 59

LOADING DOCK
LOADING BERTHS (12'X30')
 REQUIRED: 03
 PROVIDED: 03

LOADING PLATFORM (100 SF EACH)
 REQUIRED: 03
 PROVIDED: 03

DELIVERY SPACE (20'X10')
 REQUIRED: 01
 PROVIDED: 01

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PROJECT INFORMATION

PROJECT: 2530
 DATE: May 2026
 SCALE:

SHEET NUMBER:

VDR A0.02

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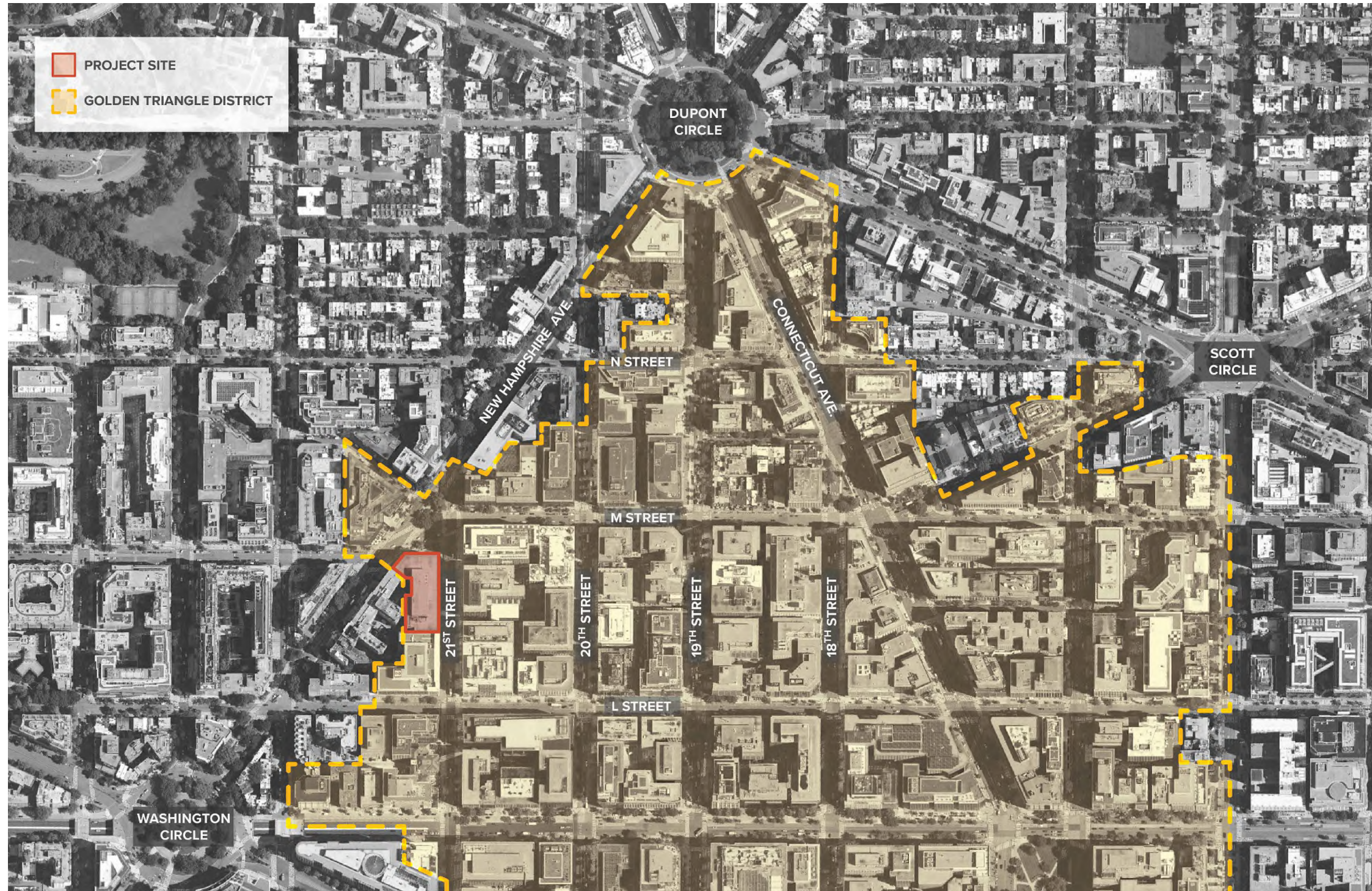
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CONTEXTUAL INFLUENCES MAP

PROJECT: 2530
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DISTRICT CONTEXT MAP

PROJECT: 2530
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SITE CONTEXT MAP

PROJECT: 2530
DATE: May 2026
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SHEET NUMBER:

VDR A0.05



1 Yours Truly Hotel



2 22 West



3 1200 New Hampshire Ave.



4 Duke Ellington Park



5 St. Gregory Hotel



6 2050 M Street



7 3 Lafayette Center



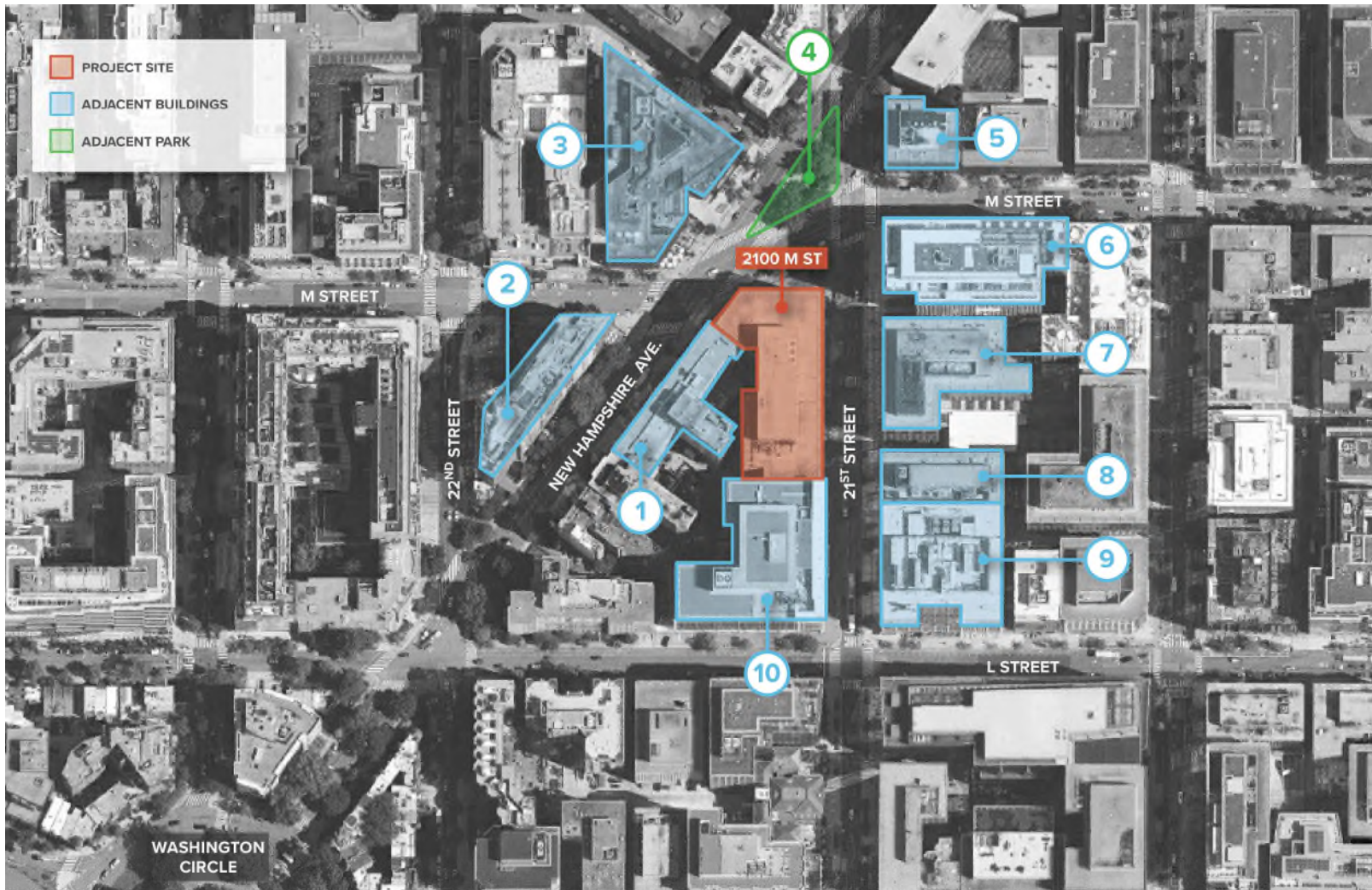
8 2 Lafayette Center



9 2055 L Street



10 2101 L Street



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CONTEXT PHOTOS

PROJECT: 2530

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SCALE:

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SITE PHOTO - M ST LOOKING EAST

PROJECT SITE



SITE PHOTO - 21ST ST LOOKING SOUTH

PROJECT SITE



SITE PHOTO - NEW HAMPSHIRE AVE LOOKING SOUTHEAST

PROJECT SITE



SITE PHOTO - 21ST ST LOOKING NORTH

PROJECT SITE

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EXISTING CONDITIONS

PROJECT: 2530
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PICKARD CHILTON

2100 M STREET NW
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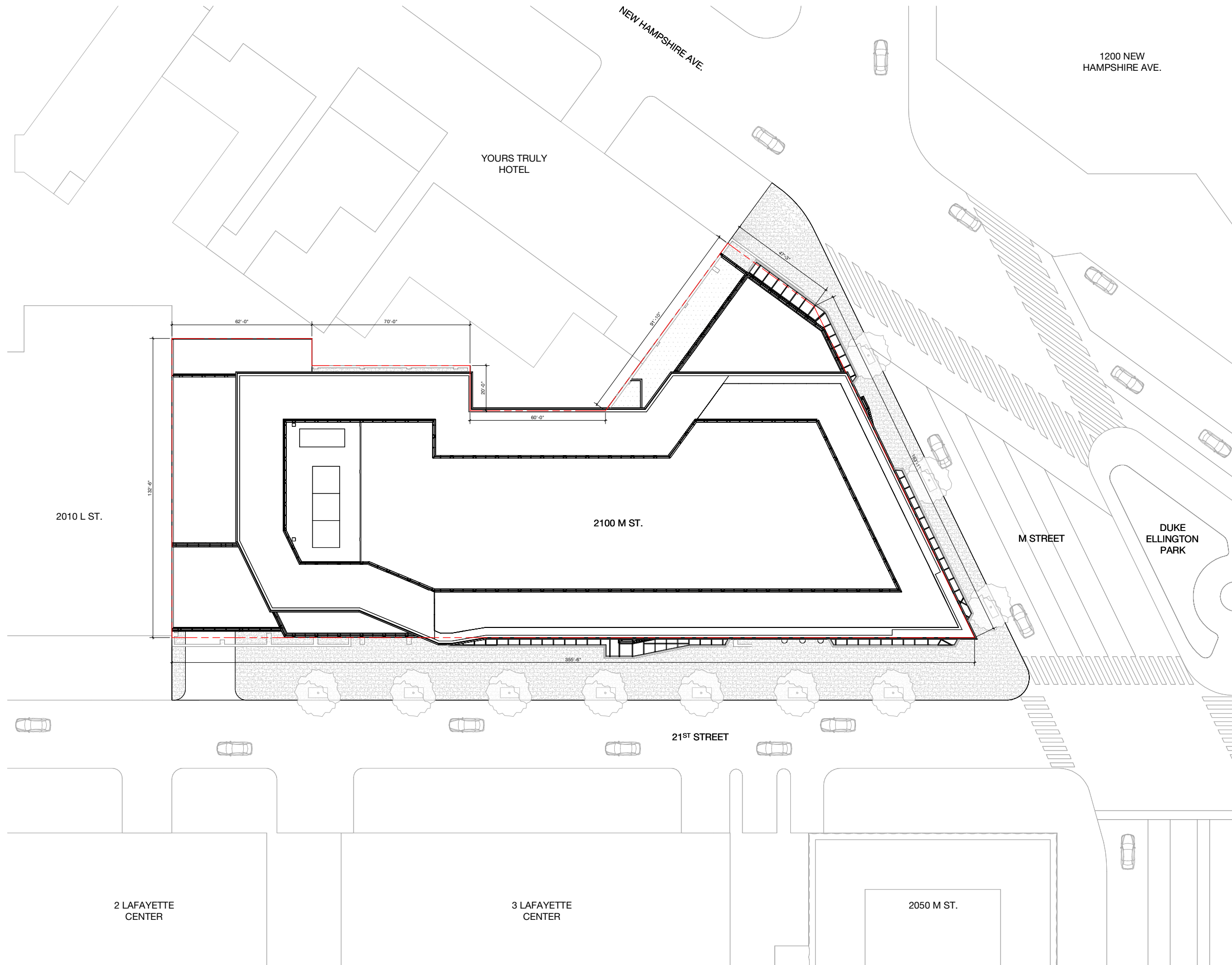
SITE PLAN

PROJECT: 2530
DATE: May 2026
SCALE: 1/16" = 1'-0"

SHEET NUMBER:

VDR A1.01

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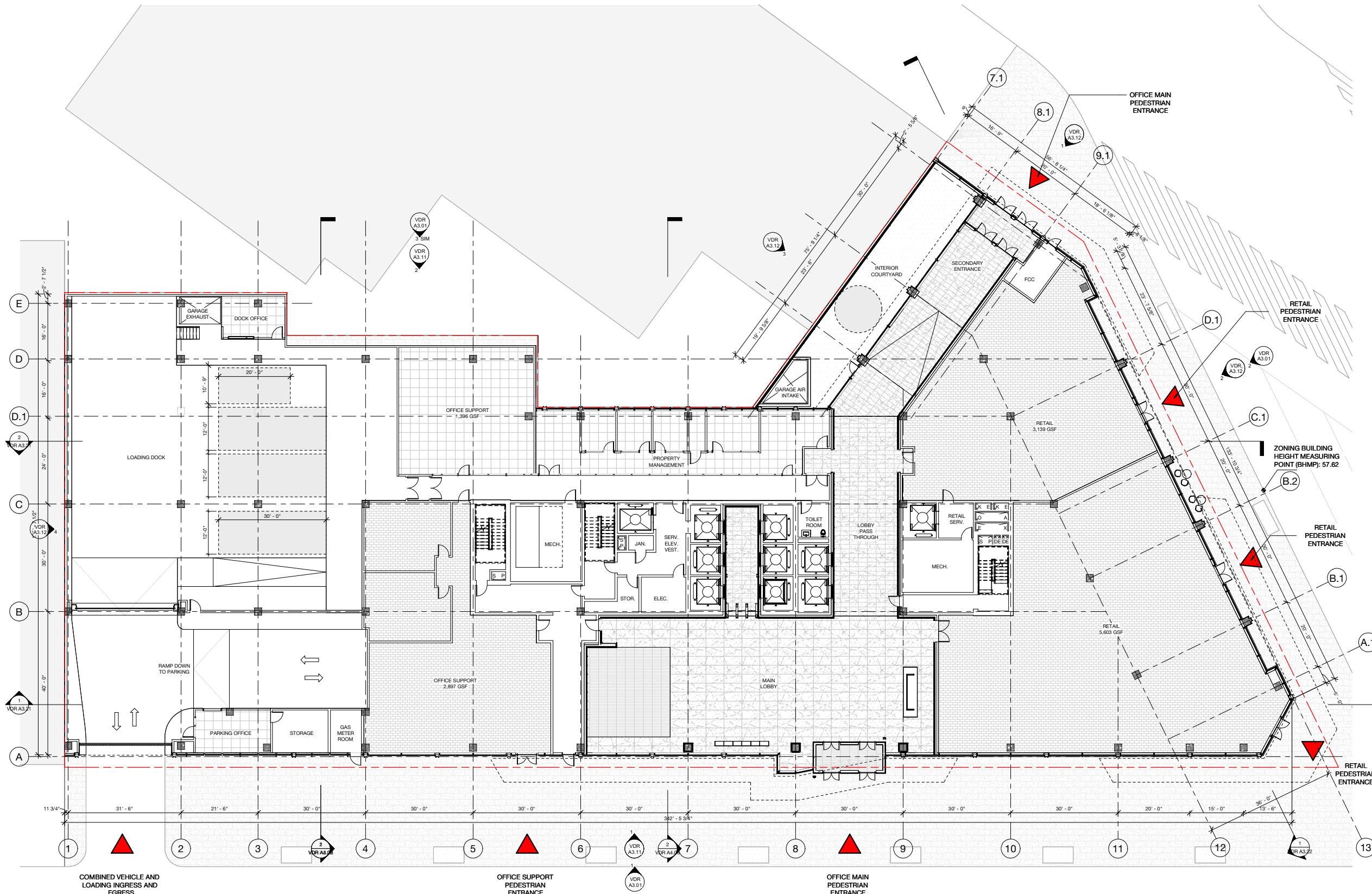
LEVEL 1 PLAN

PROJECT: 2530
DATE: May 2026
SCALE: 3/32" = 1'-0"

SHEET NUMBER:

VDR A2.01

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* LOCATION OF RETAIL ENTRANCES ARE CONCEPTUAL AND SUBJECT TO CHANGE BASED ON RETAIL DEMISING PLAN AND TENANT NEEDS.

1 VDR - LEVEL 01 PLAN
3/32" = 1'-0"

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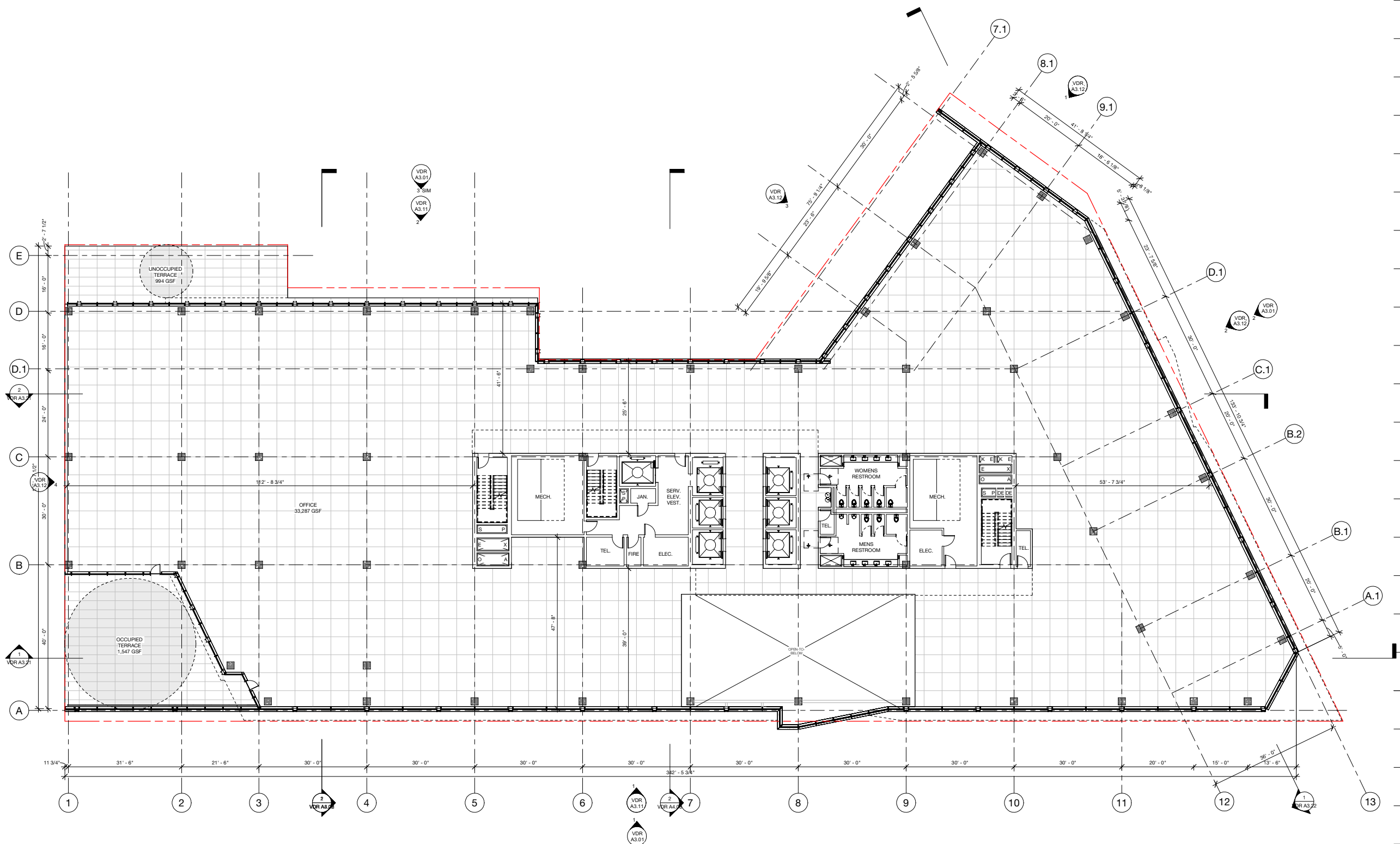
LEVEL 2 PLAN

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SHEET NUMBER:

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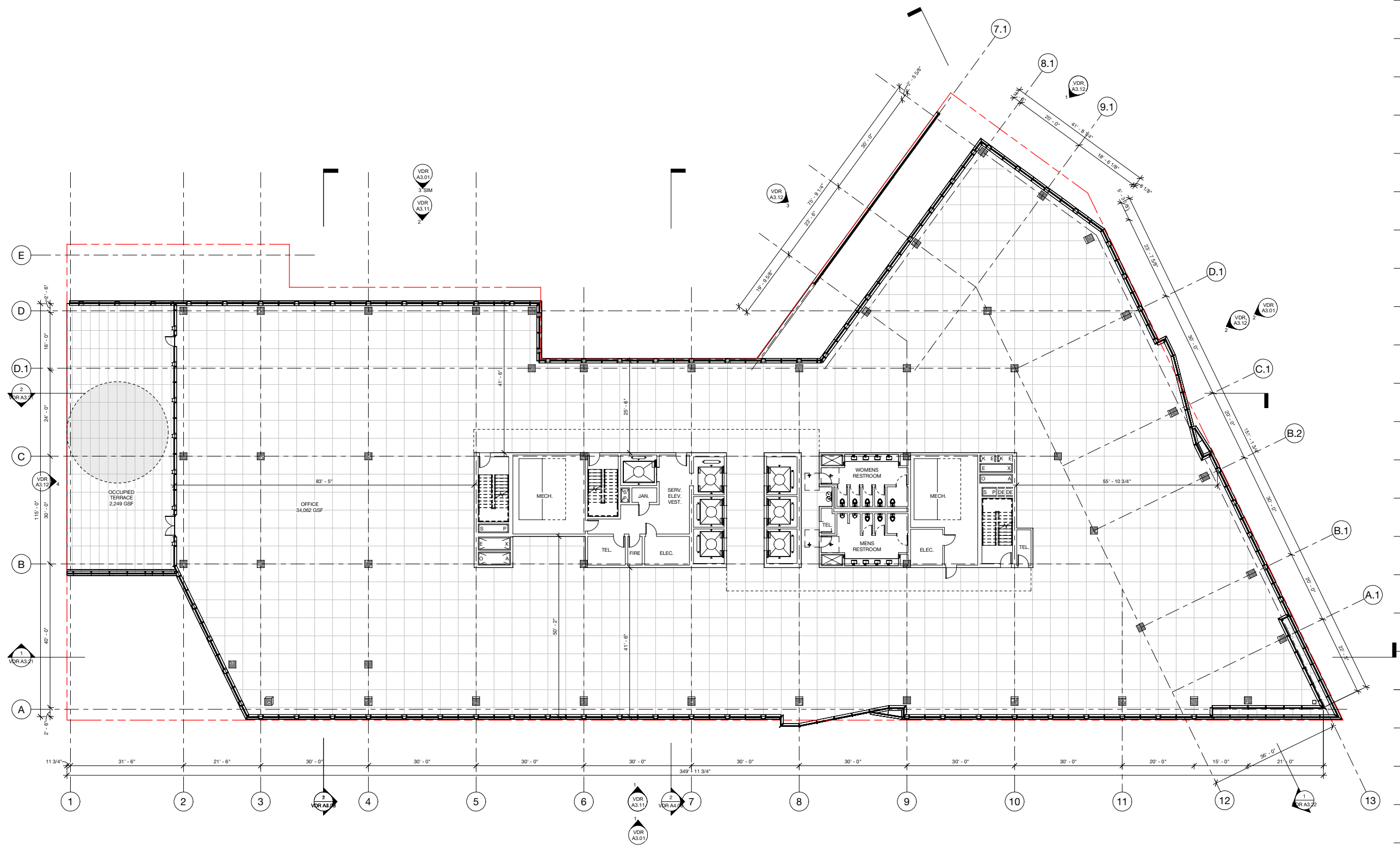
LEVEL 3 PLAN

PROJECT: 2530
DATE: May 2026
SCALE: 3/32" = 1'-0"

SHEET NUMBER:

VDR A2.03

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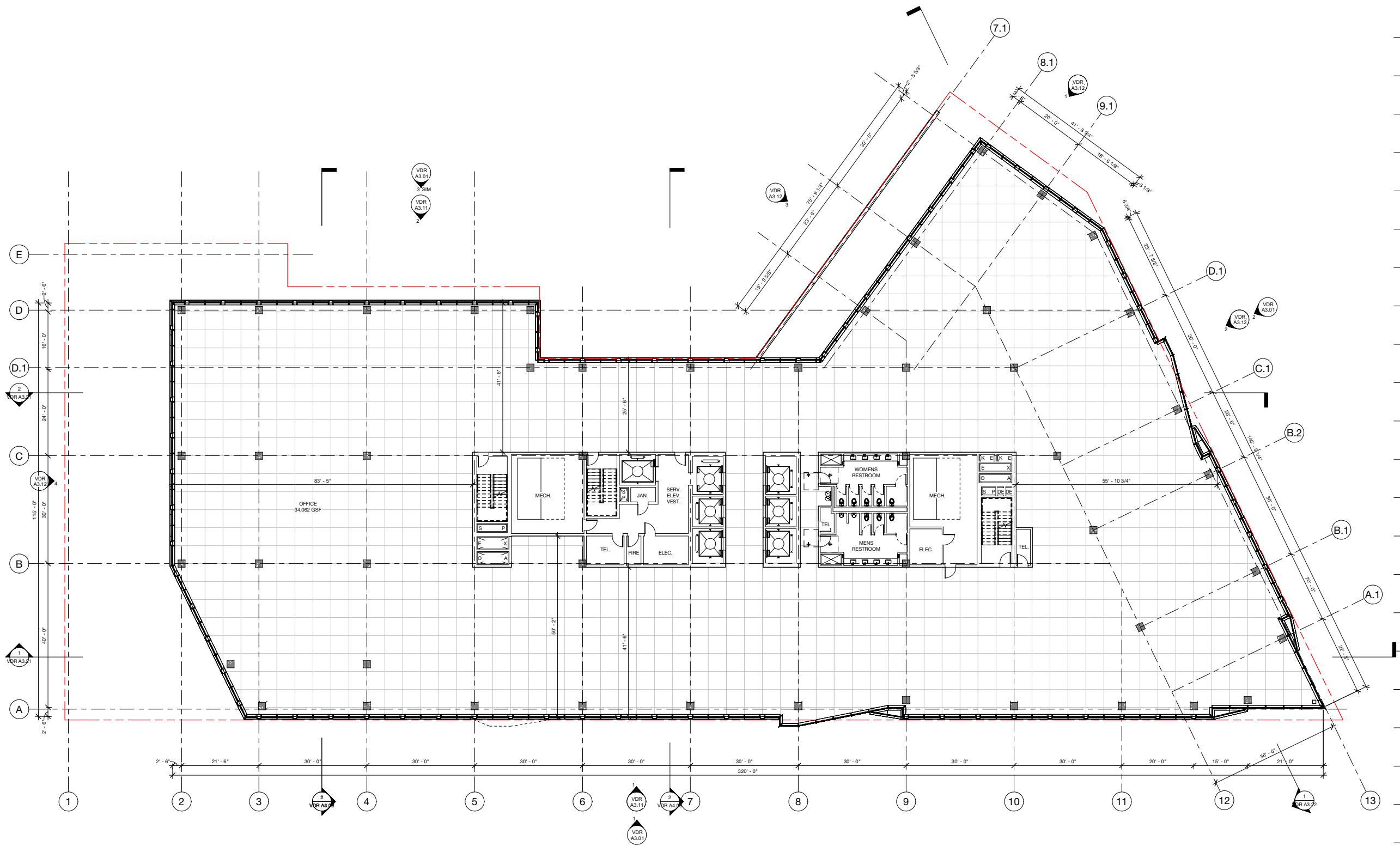
LEVEL 4 PLAN

PROJECT: 2530
DATE: May 2026
SCALE: 3/32" = 1'-0"

SHEET NUMBER:

VDR A2.04

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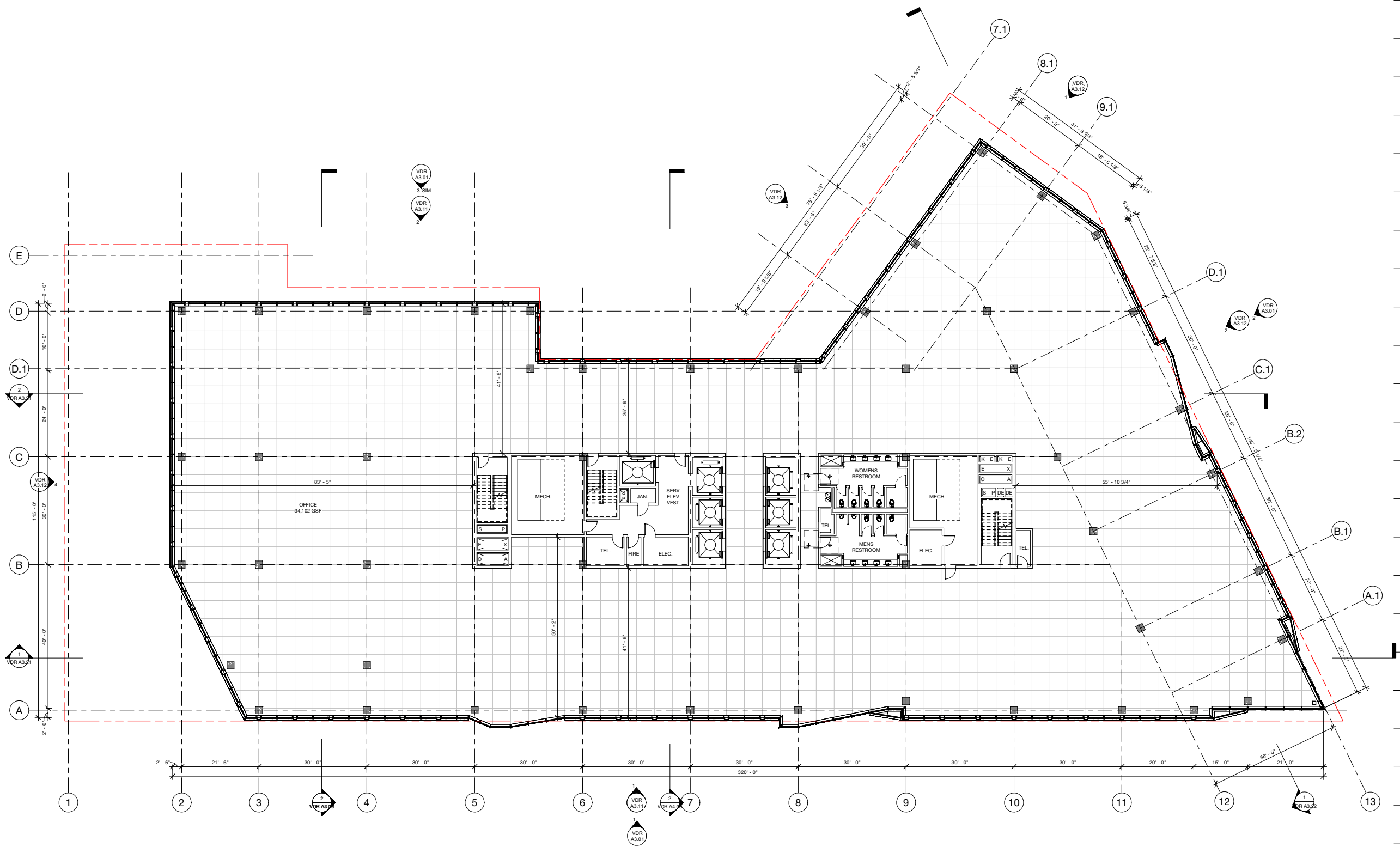
LEVEL 5 PLAN

PROJECT: 2530
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SCALE: 3/32" = 1'-0"

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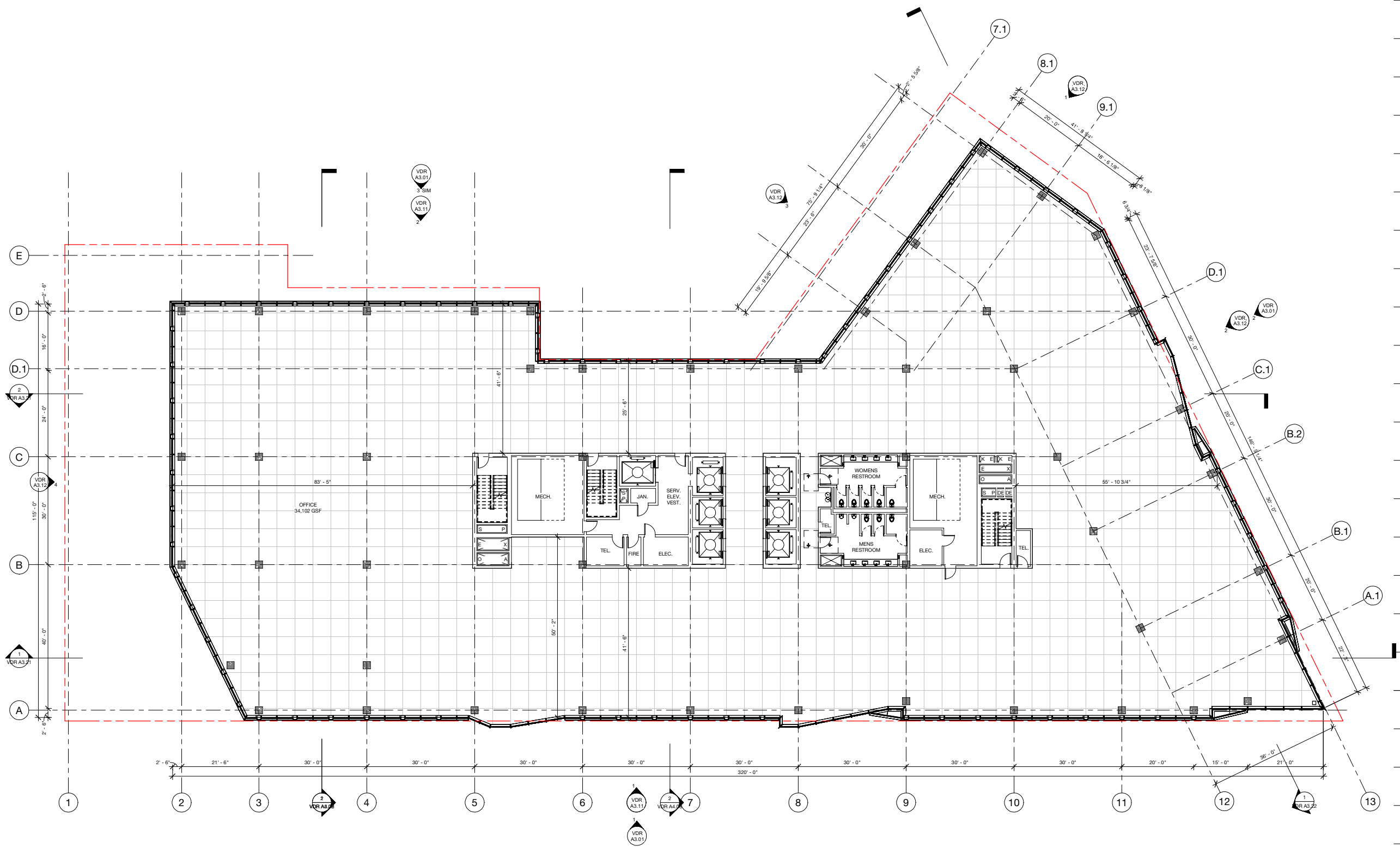
LEVEL 6 PLAN

PROJECT: 2530
DATE: May 2026
SCALE: 3/32" = 1'-0"

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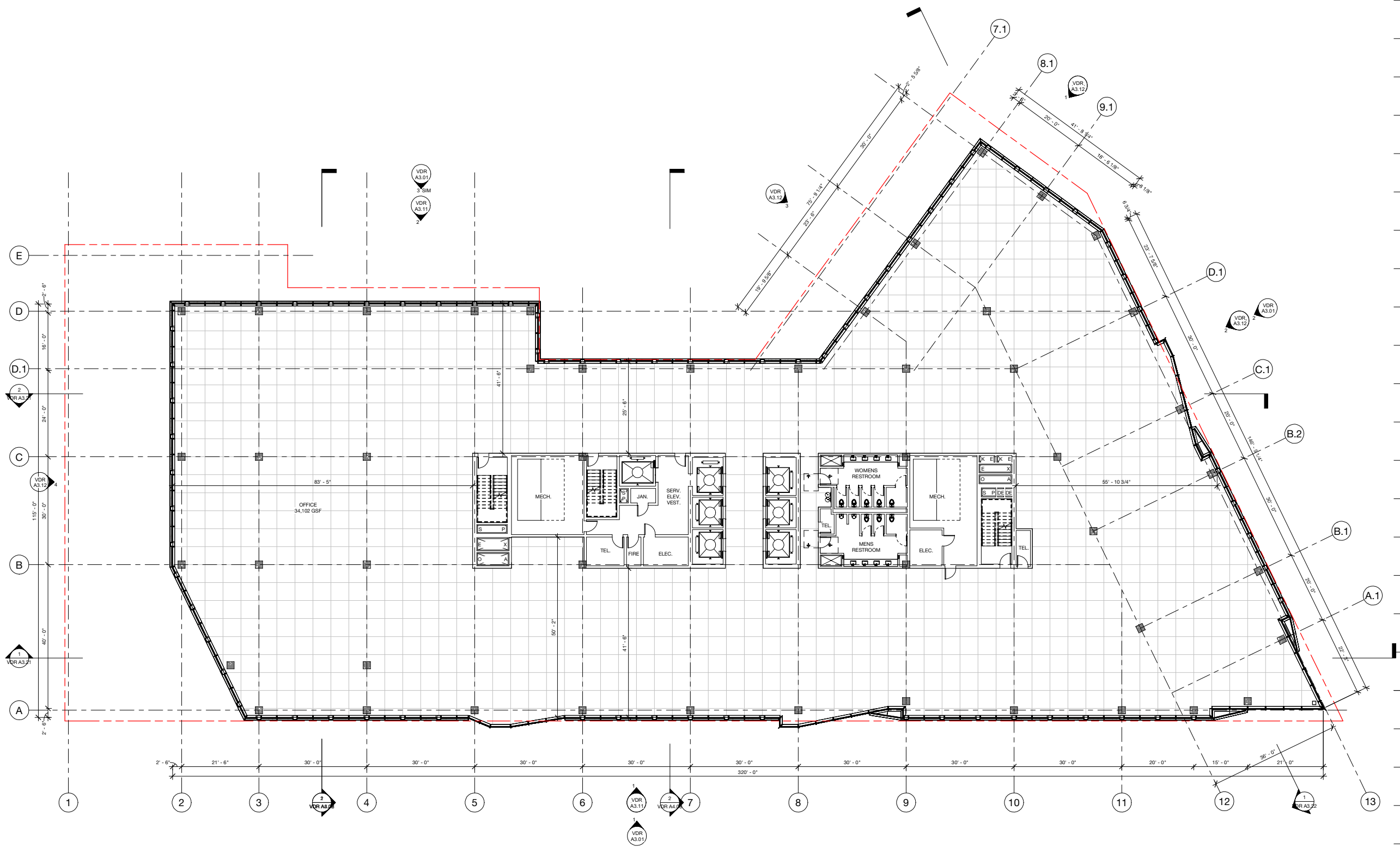
LEVEL 7 PLAN

PROJECT: 2530
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SCALE: 3/32" = 1'-0"

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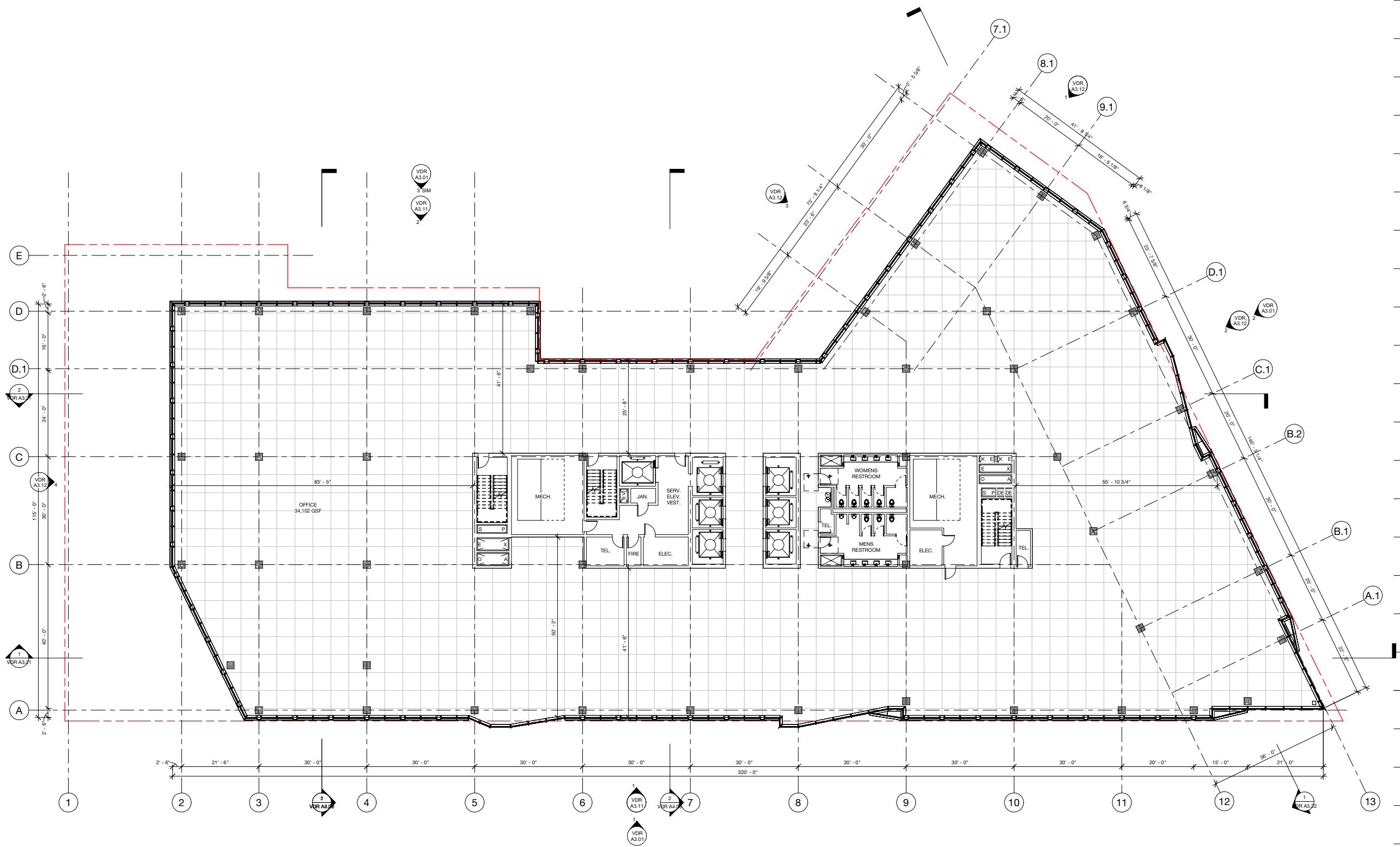
LEVEL 8 PLAN

PROJECT: 2530
DATE: May 2026
SCALE: 3/32" = 1'-0"

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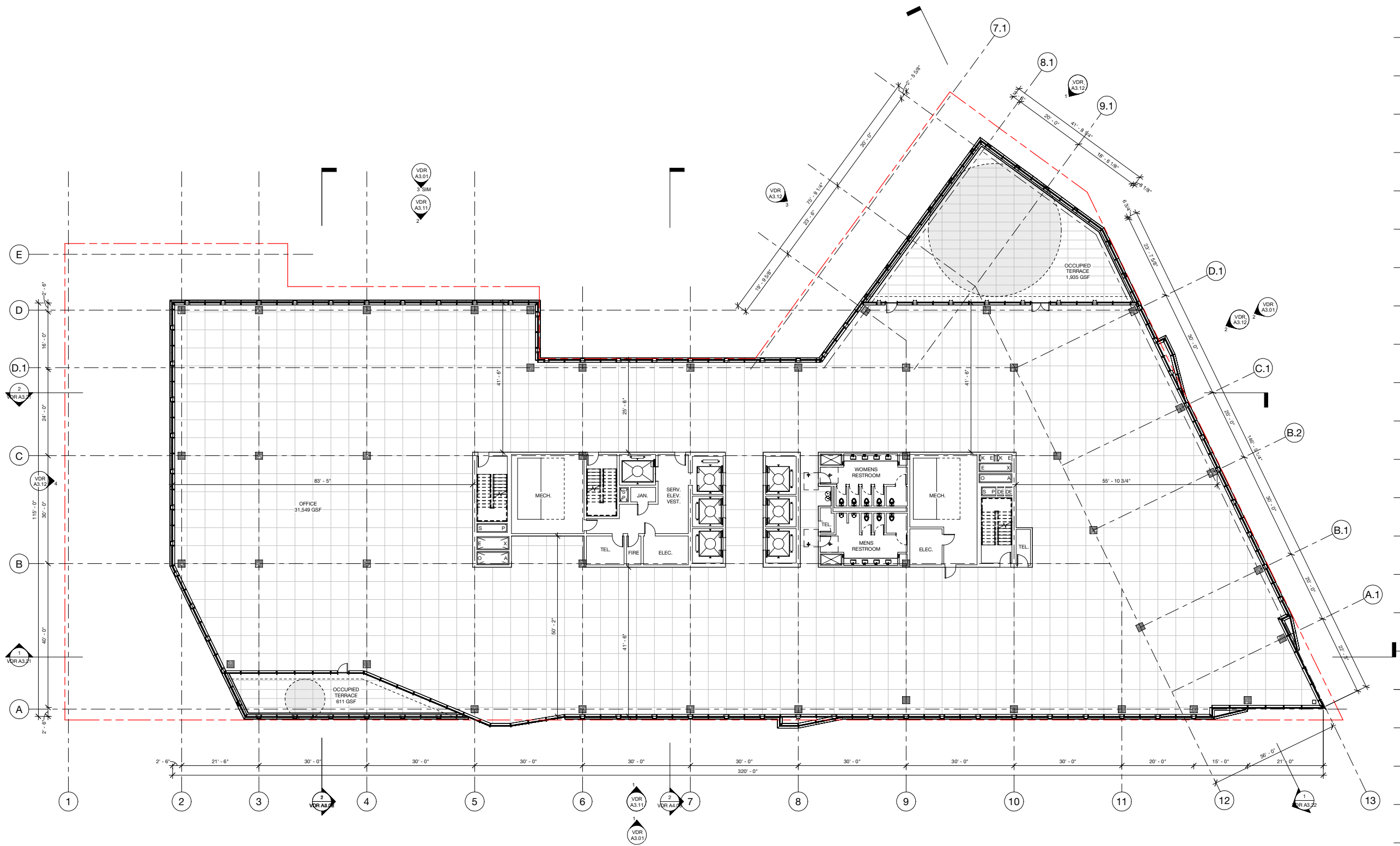
LEVEL 9 PLAN

PROJECT: 2530
DATE: May 2026
SCALE: 3/32" = 1'-0"

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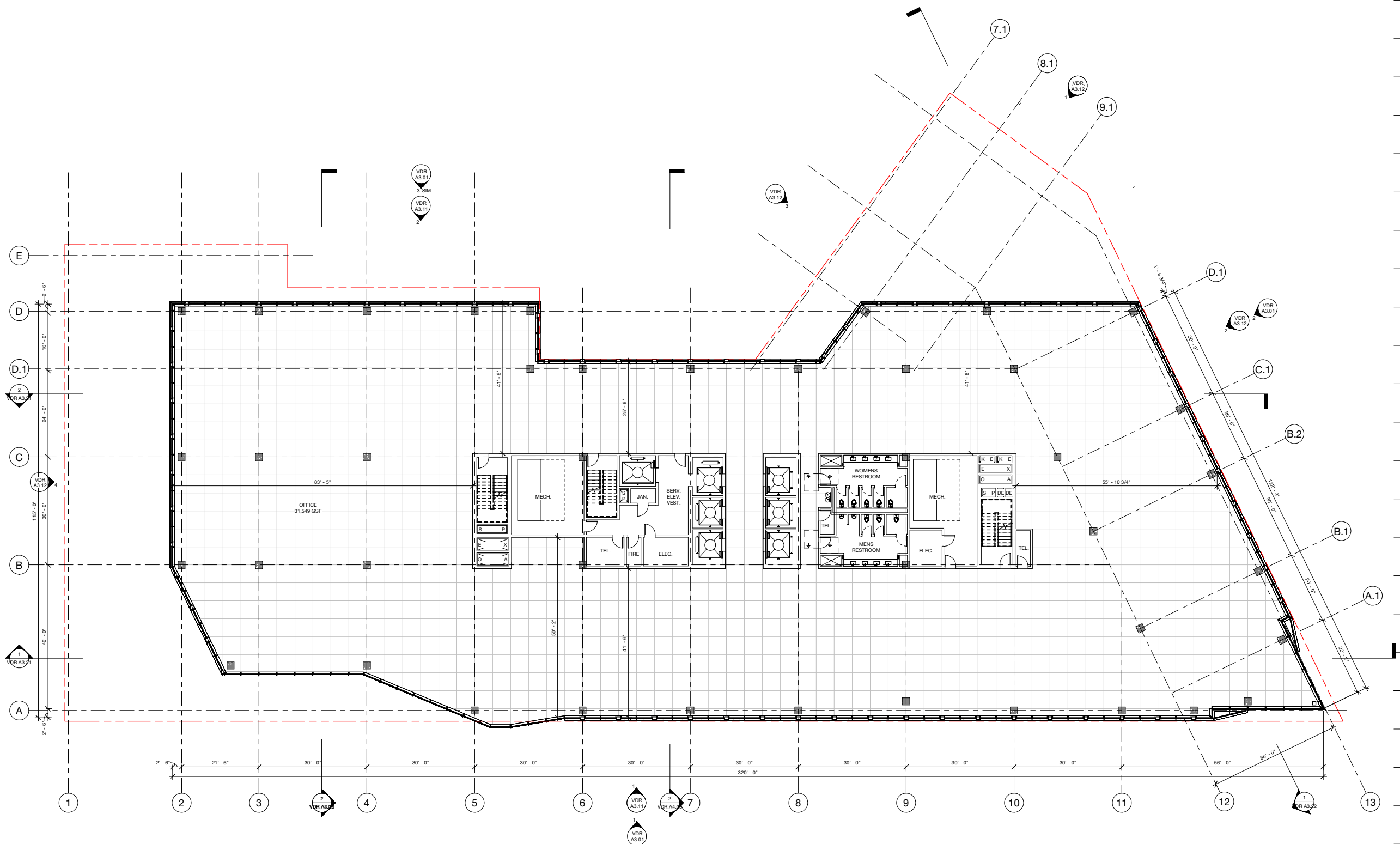
LEVEL 10 PLAN

PROJECT: 2530
DATE: May 2026
SCALE: 3/32" = 1'-0"

SHEET NUMBER:

VDR A2.10

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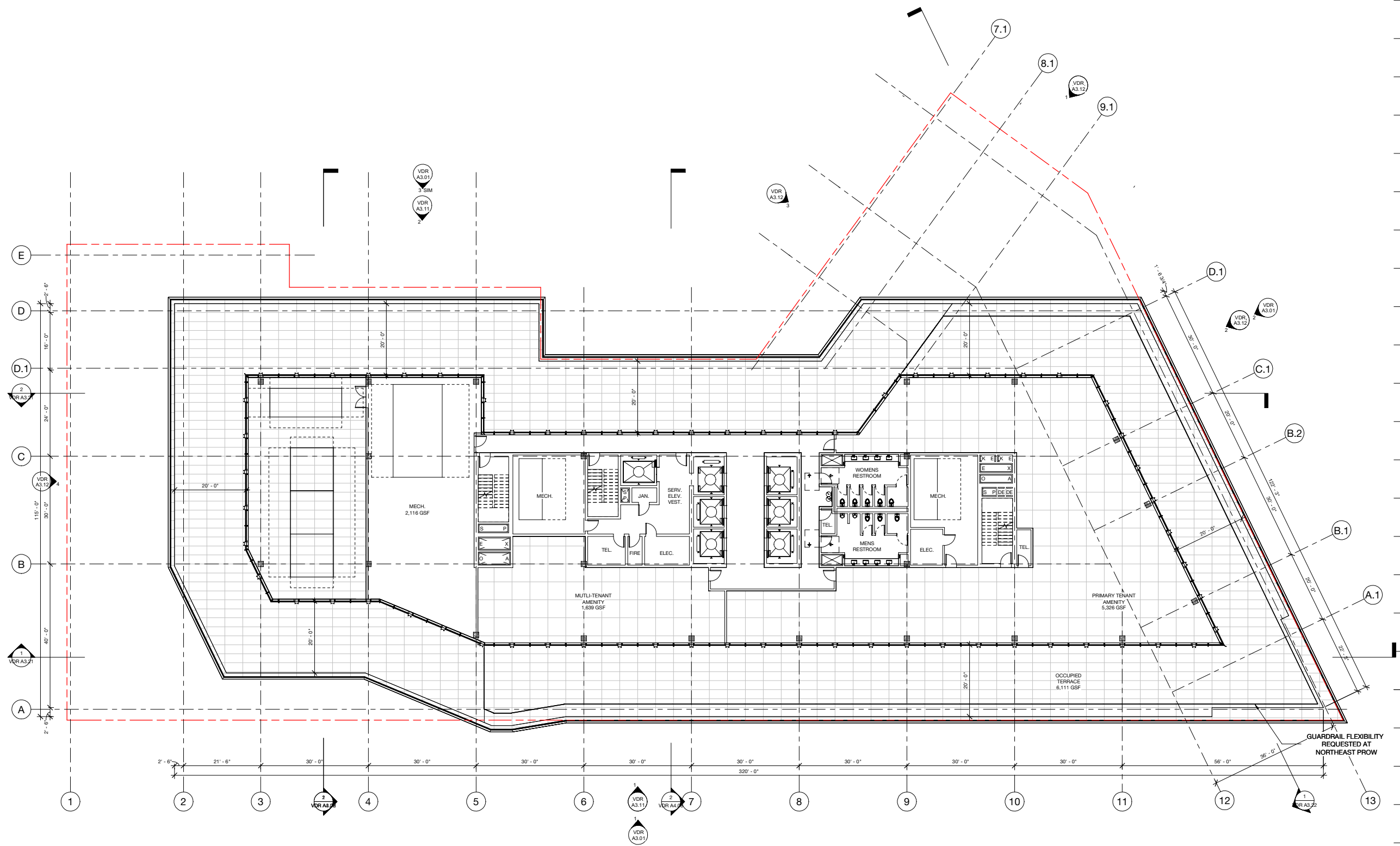
LEVEL 11 PLAN (PENTHOUSE)

PROJECT: 2530
DATE: May 2026
SCALE: 3/32" = 1'-0"

SHEET NUMBER:

VDR A2.11

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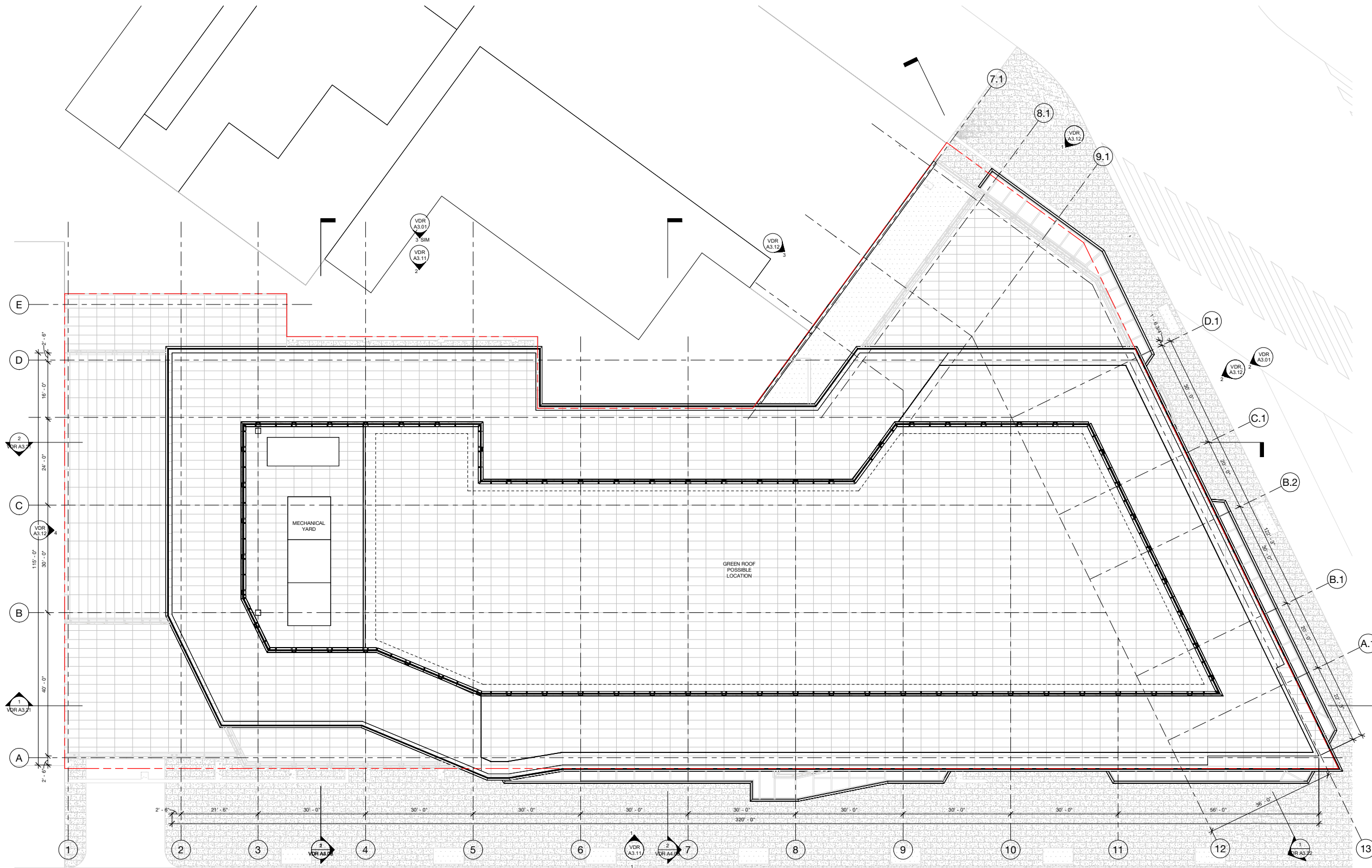
ROOF PLAN

PROJECT: 2530
DATE: May 2026
SCALE: 3/32" = 1'-0"

SHEET NUMBER:

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1 VDR - ROOF PLAN
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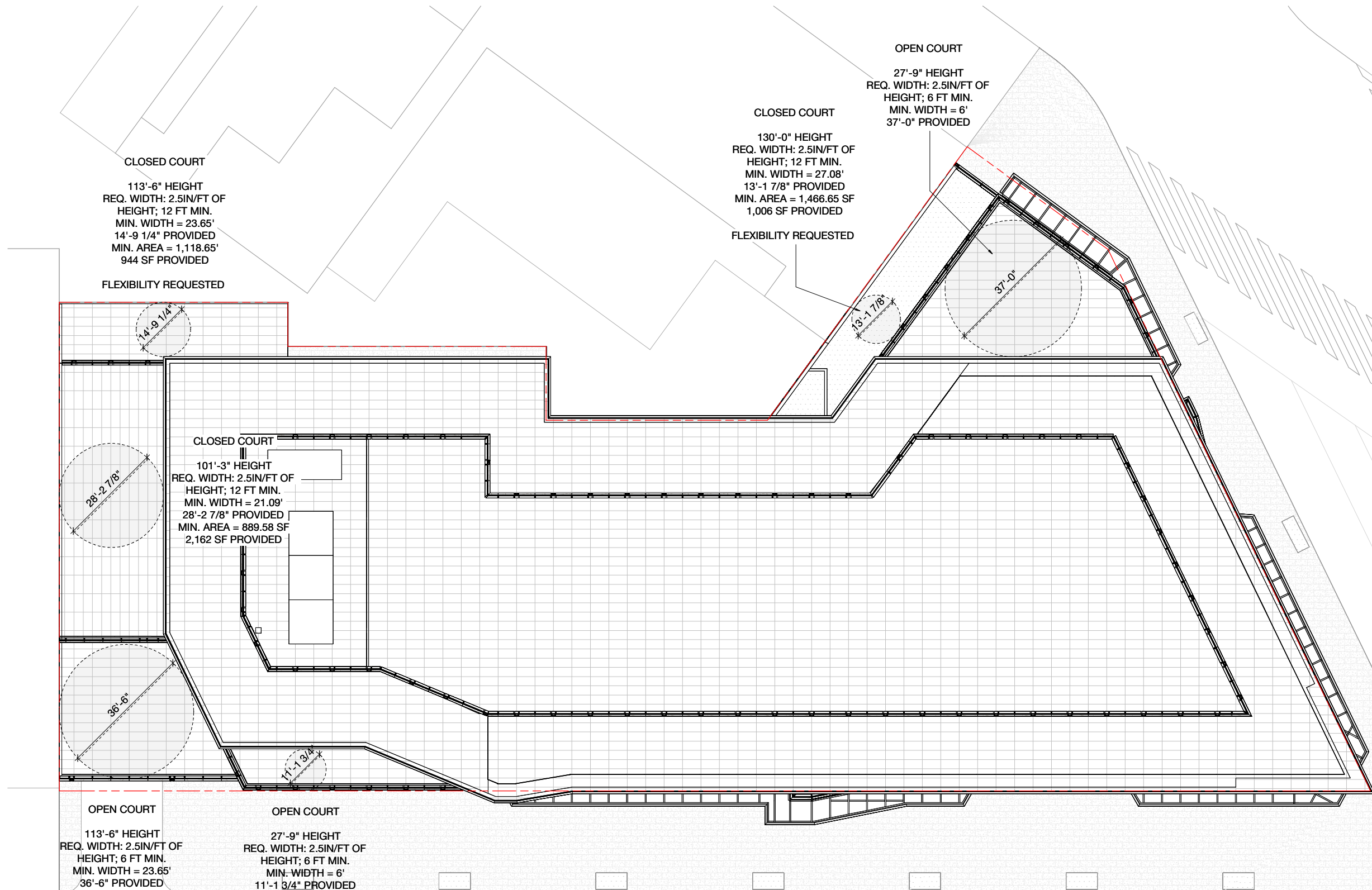
ROOF PLAN - COURTS

PROJECT: 2530
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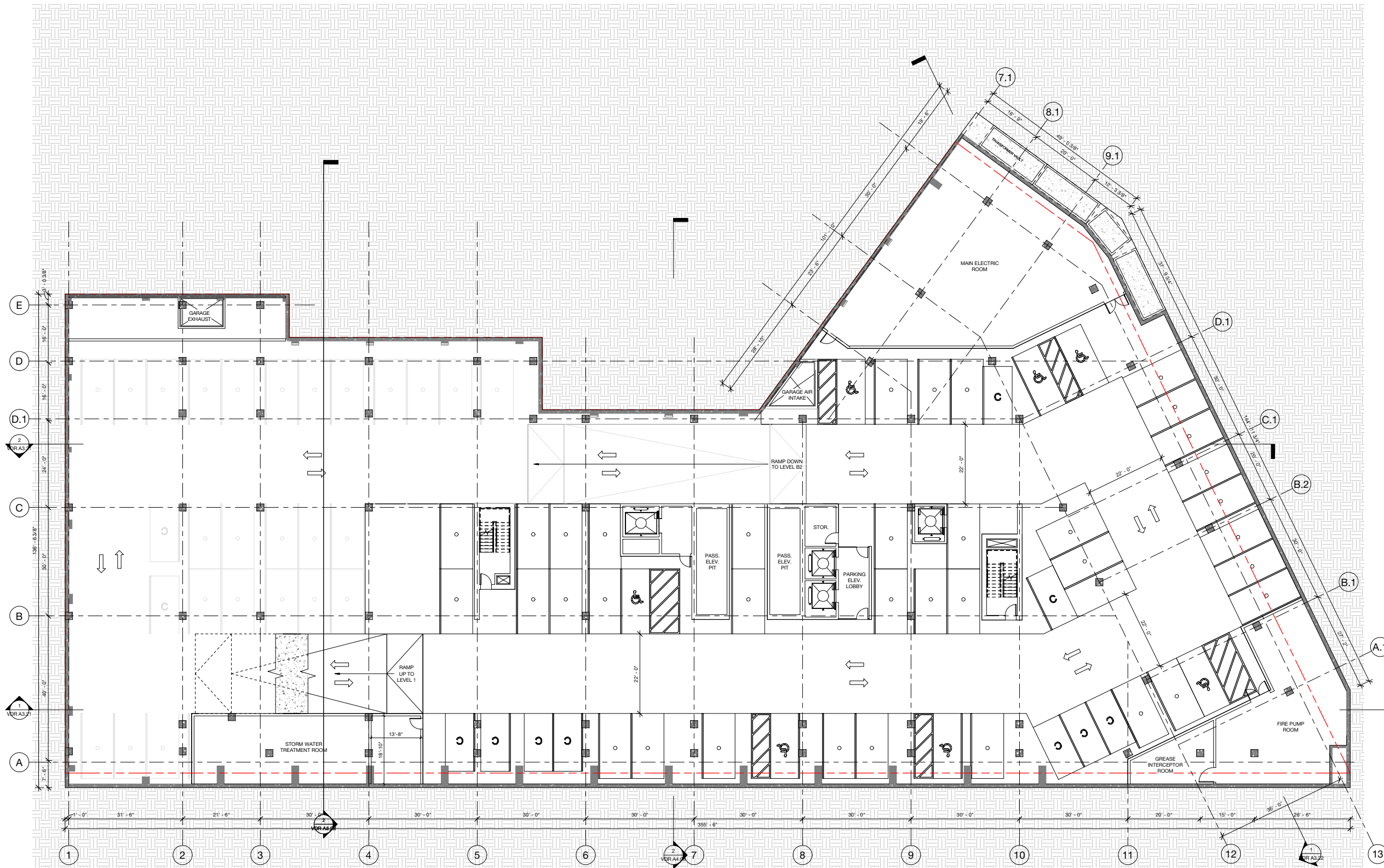
LEVEL B1 PLAN

PROJECT: 2530
DATE: May 2026
SCALE: 3/32" = 1'-0"

SHEET NUMBER:

VDR A2.B1

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1 VDR - LEVEL B1 PLAN
3/32" = 1'-0"

LEVEL B1	PARKING SPACES
Typical	26
Tandem	10
Compact	9
Accessible (Van)	2
Accessible	5
	52

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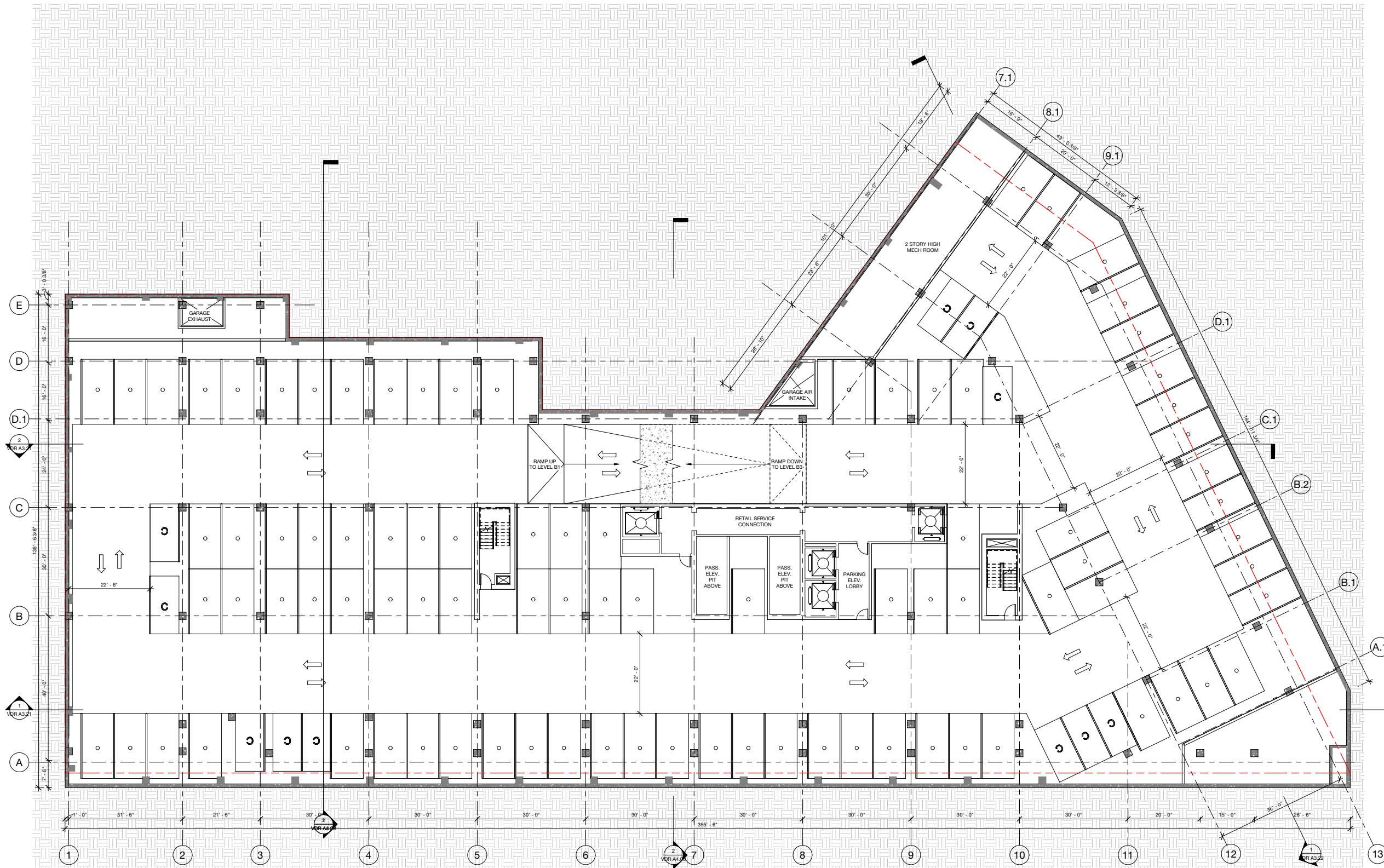
LEVEL B2 PLAN

PROJECT: 2530
DATE: May 2026
SCALE: 3/32" = 1'-0"

SHEET NUMBER:

VDR A2.B2

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1 VDR - LEVEL B2 PLAN
3/32" = 1'-0"

LEVEL B2	PARKING SPACES
Typical	86
Tandem	6
Compact	6
	98

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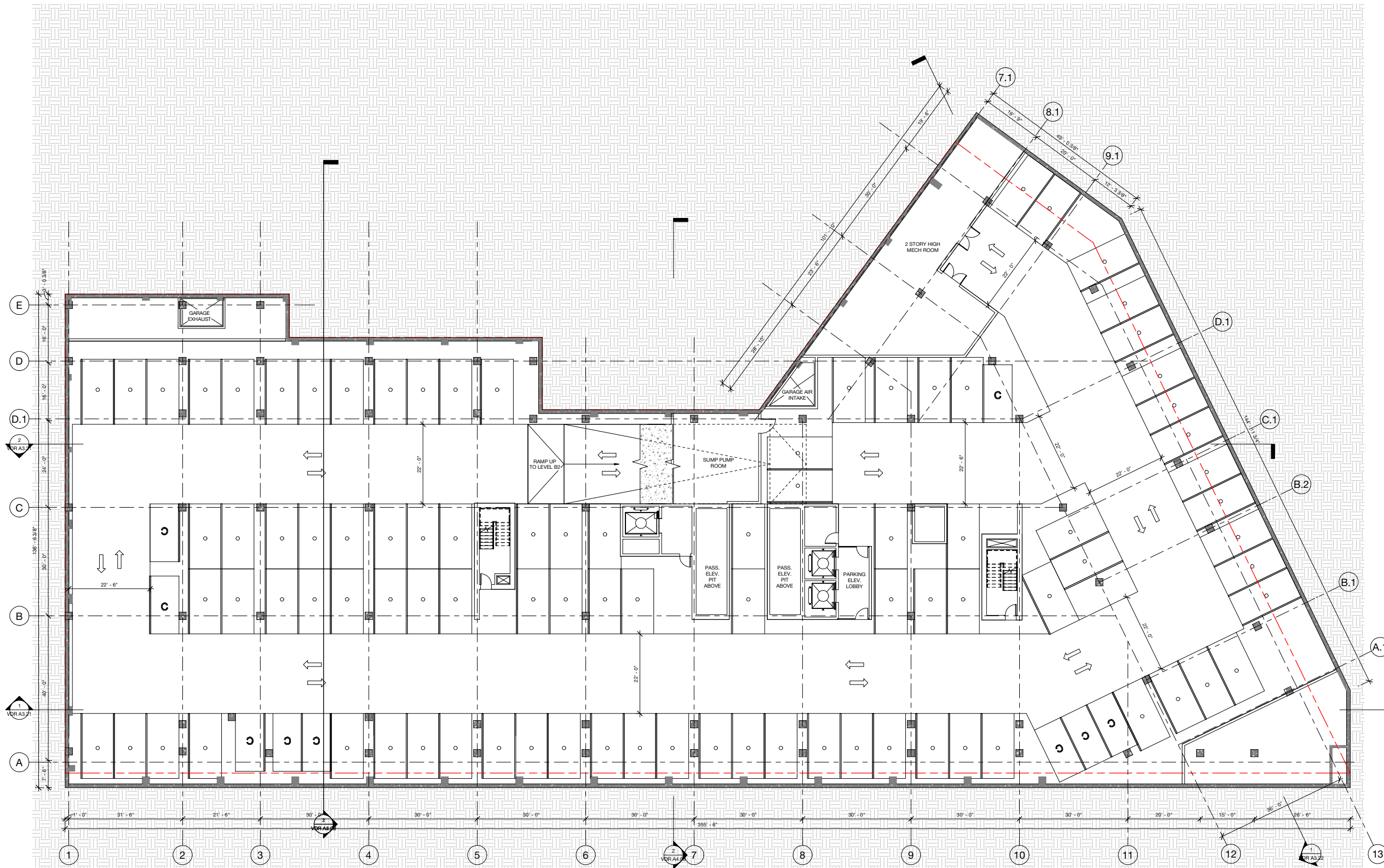
LEVEL B3 PLAN

PROJECT: 2530
DATE: May 2026
SCALE: 3/32" = 1'-0"

SHEET NUMBER:

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1 VDR - LEVEL B3 PLAN
3/32" = 1'-0"

LEVEL B3	PARKING SPACES
Typical	86
Tandem	8
Compact	6
	100

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CONTEXT ELEVATION

PROJECT: 2530
DATE: May 2026
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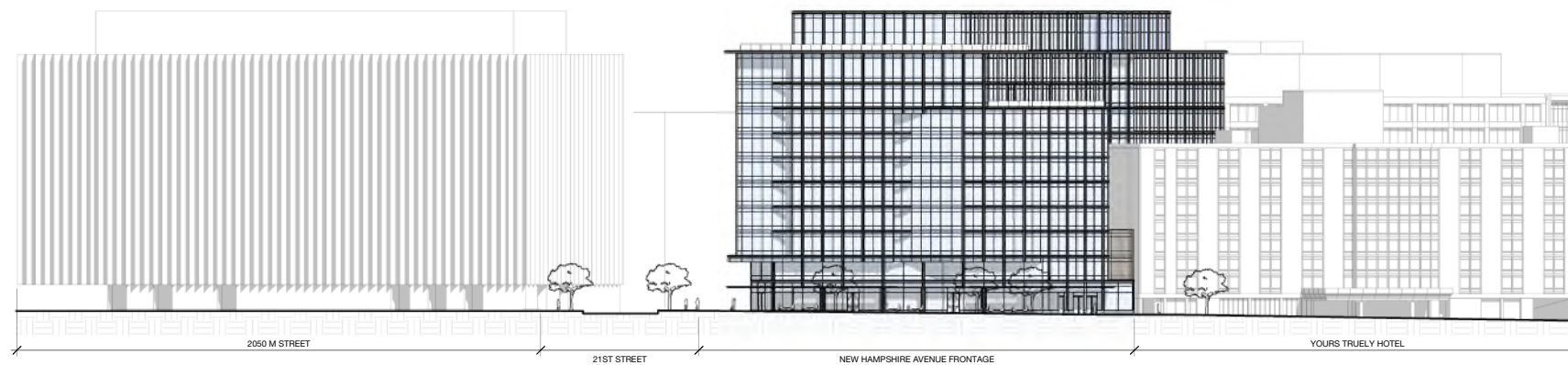
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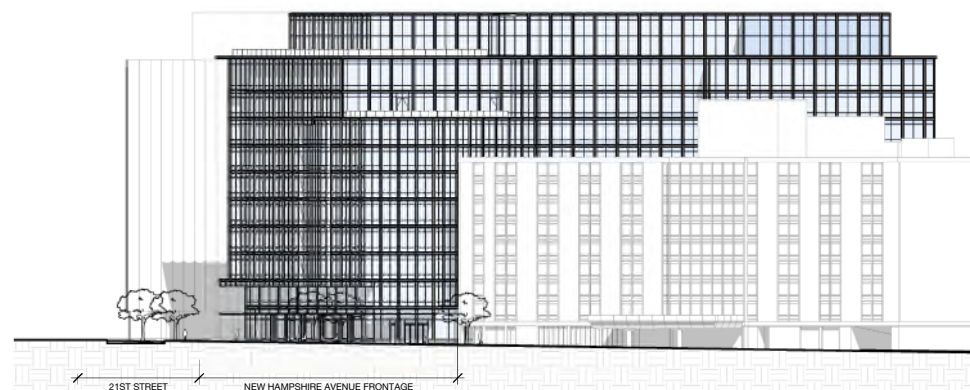
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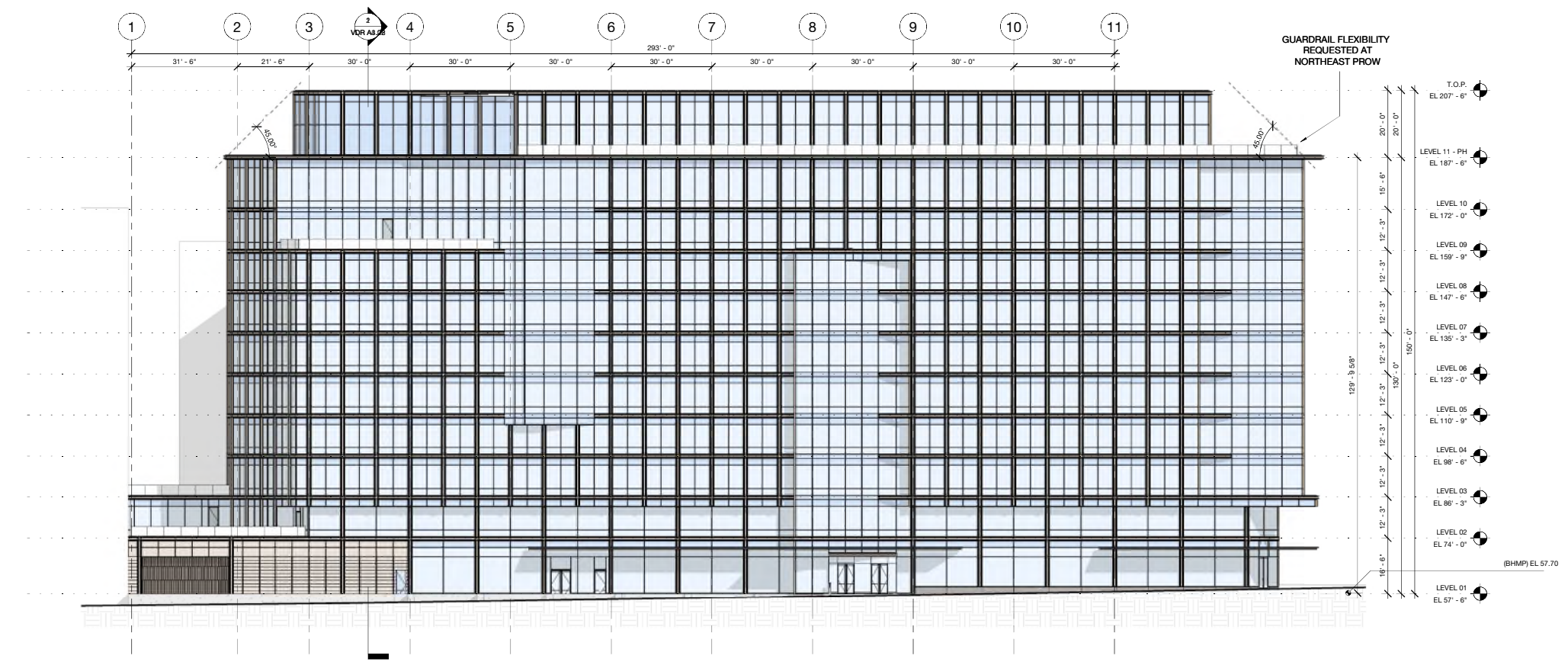
1 VDR - CONTEXT ELEVATION - EAST
1/32" = 1'-0"



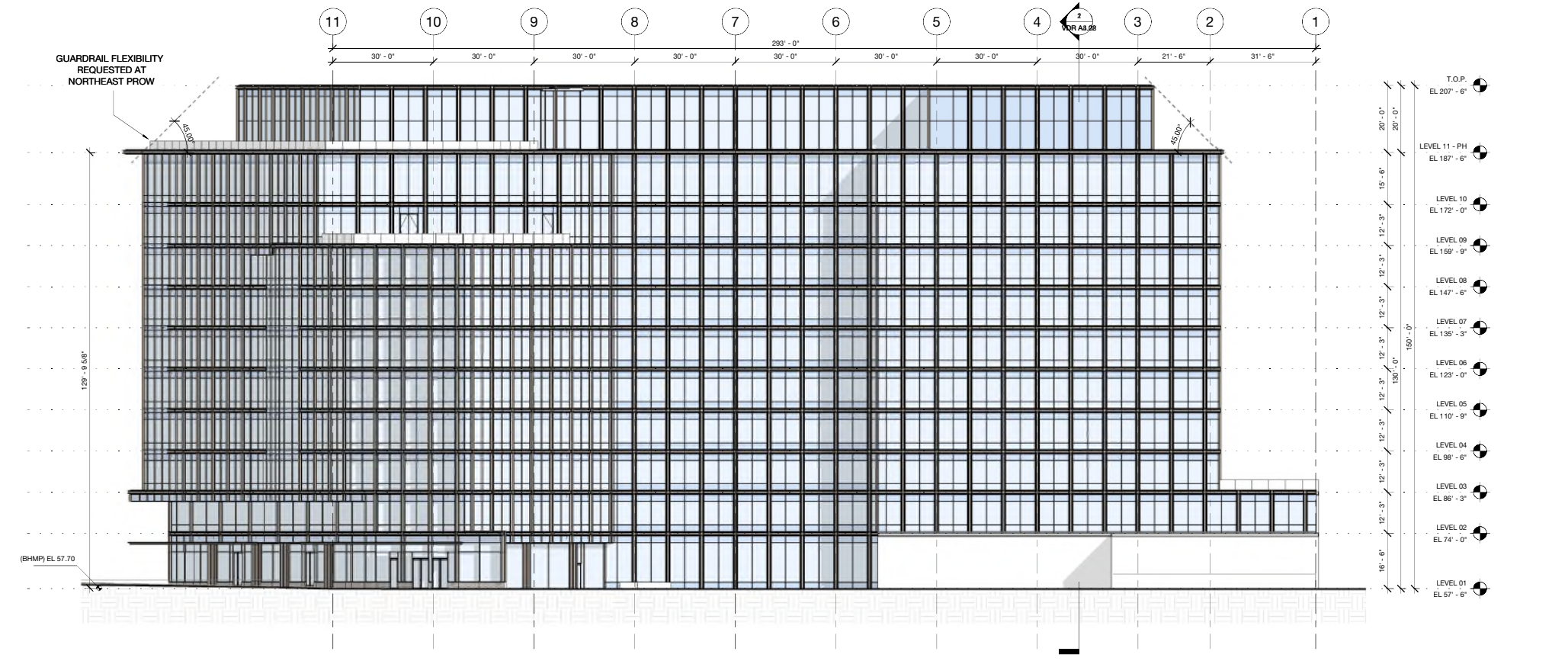
2 VDR - CONTEXT ELEVATION - NORTH
1/32" = 1'-0"



3 VDR - CONTEXT ELEVATION - WEST
1/32" = 1'-0"

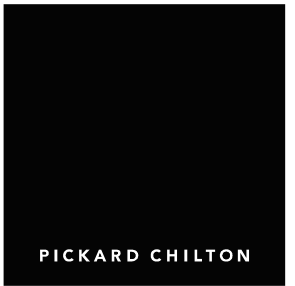


1 VDR - OVERALL ELEVATION - EAST
1/16" = 1'-0"



2 VDR - OVERALL ELEVATION - WEST
1/16" = 1'-0"

* LOCATION OF ALL DOORS CONCEPTUAL AND SUBJECT TO CHANGE BASED ON OPERATIONAL AND TENANT NEEDS. FLEXIBILITY REQUESTED TO MODIFY ELEVATIONS TO INCORPORATE SELECT LOUVER PANELS TO ACCOMMODATE MECHANICAL VENTING NEEDS.



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OVERALL ELEVATIONS

PROJECT: 2530
DATE: May 2026
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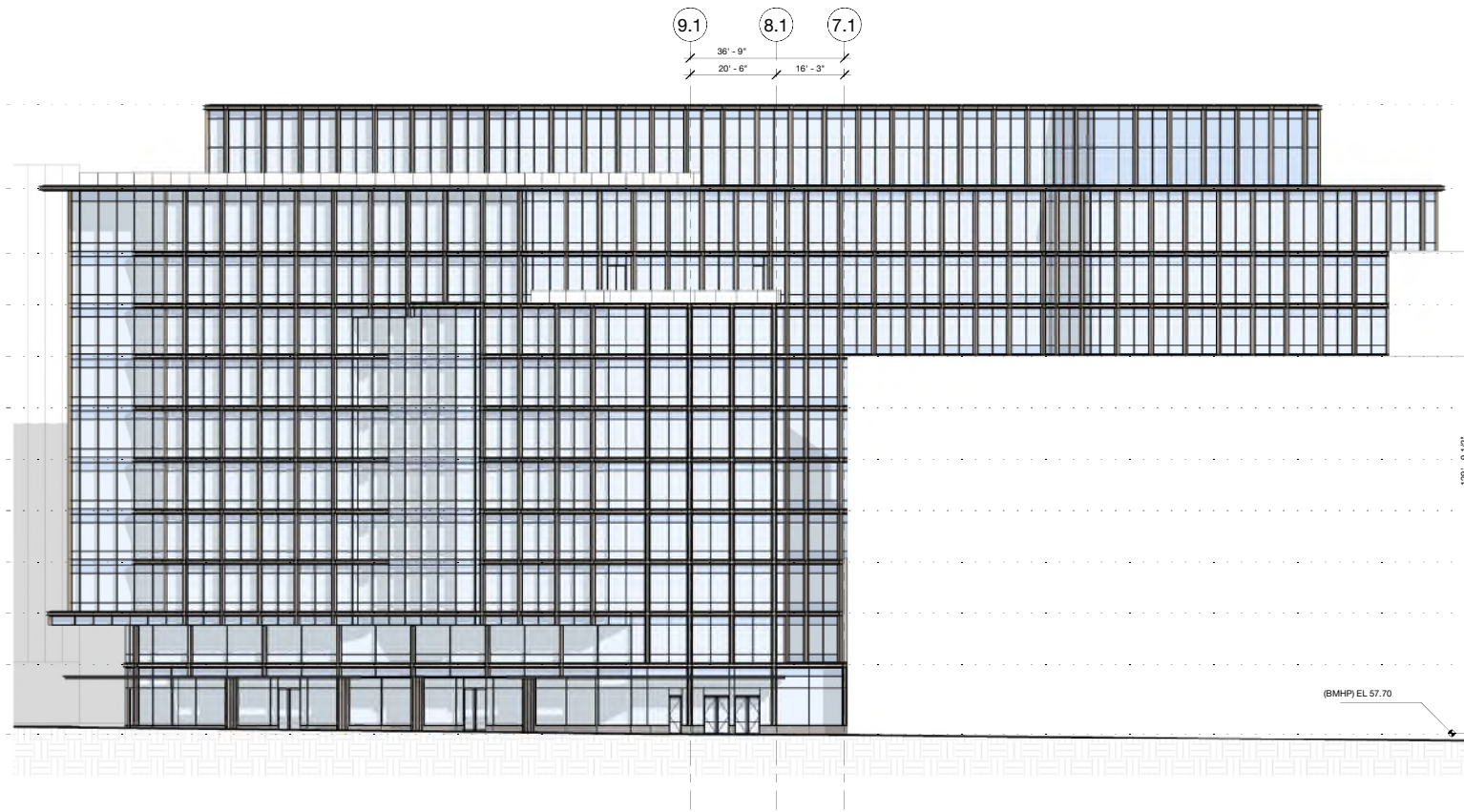
OVERALL ELEVATIONS

PROJECT: 2530
DATE: May 2026
SCALE: 1/16" = 1'-0"

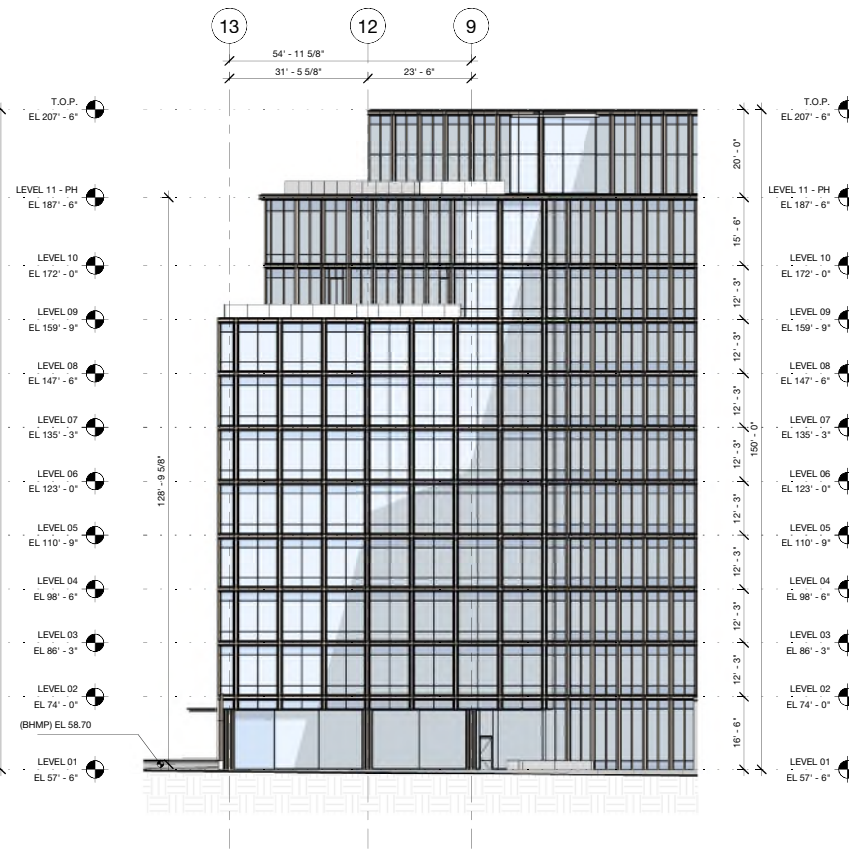
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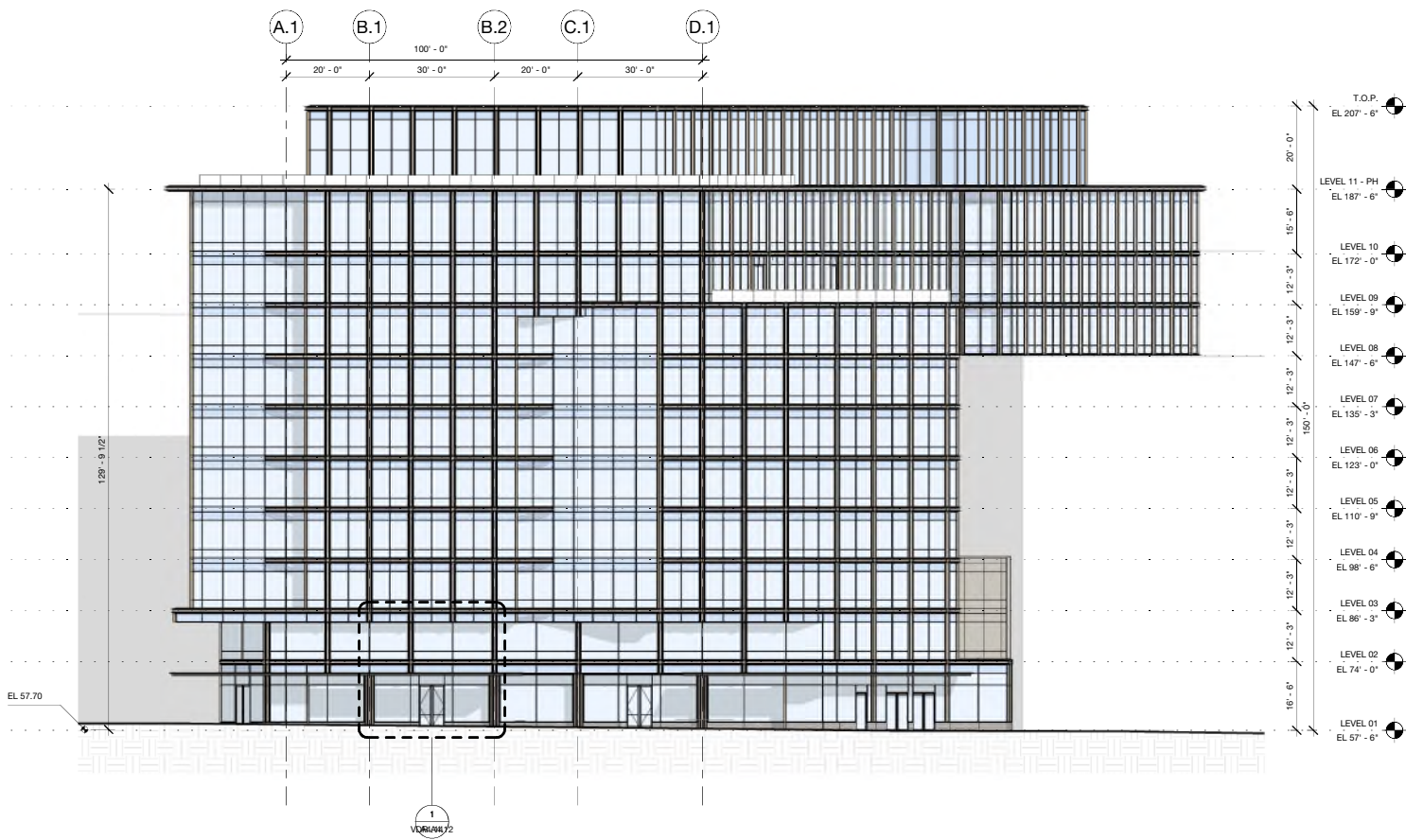
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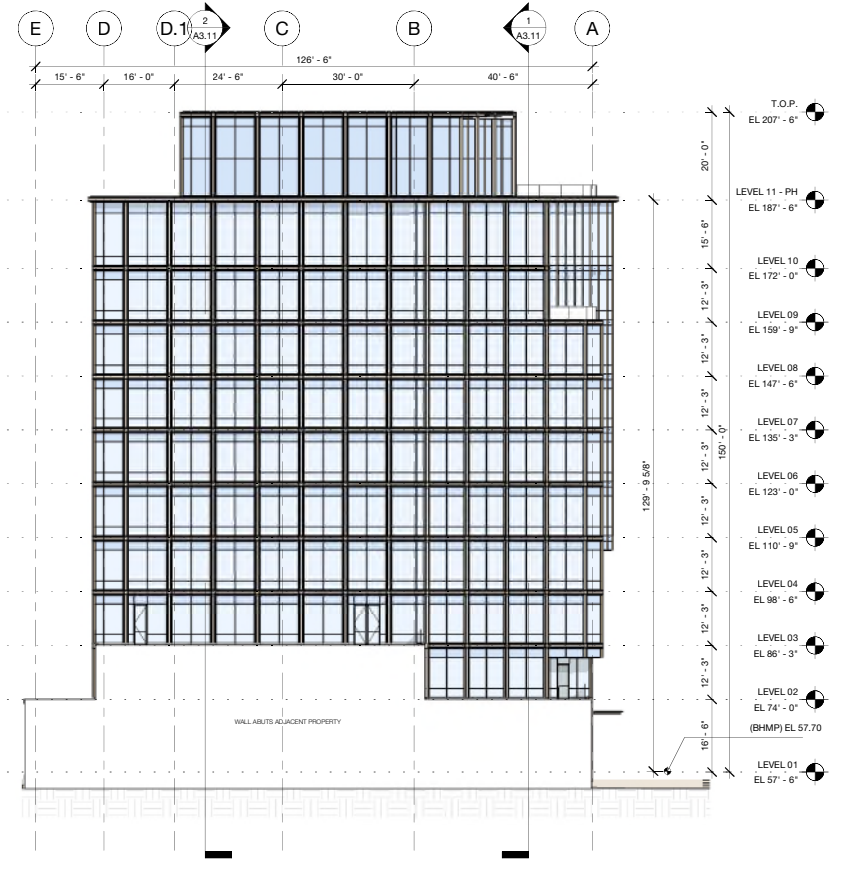
1 OVERALL ELEVATION - NORTHWEST
1/16" = 1'-0"



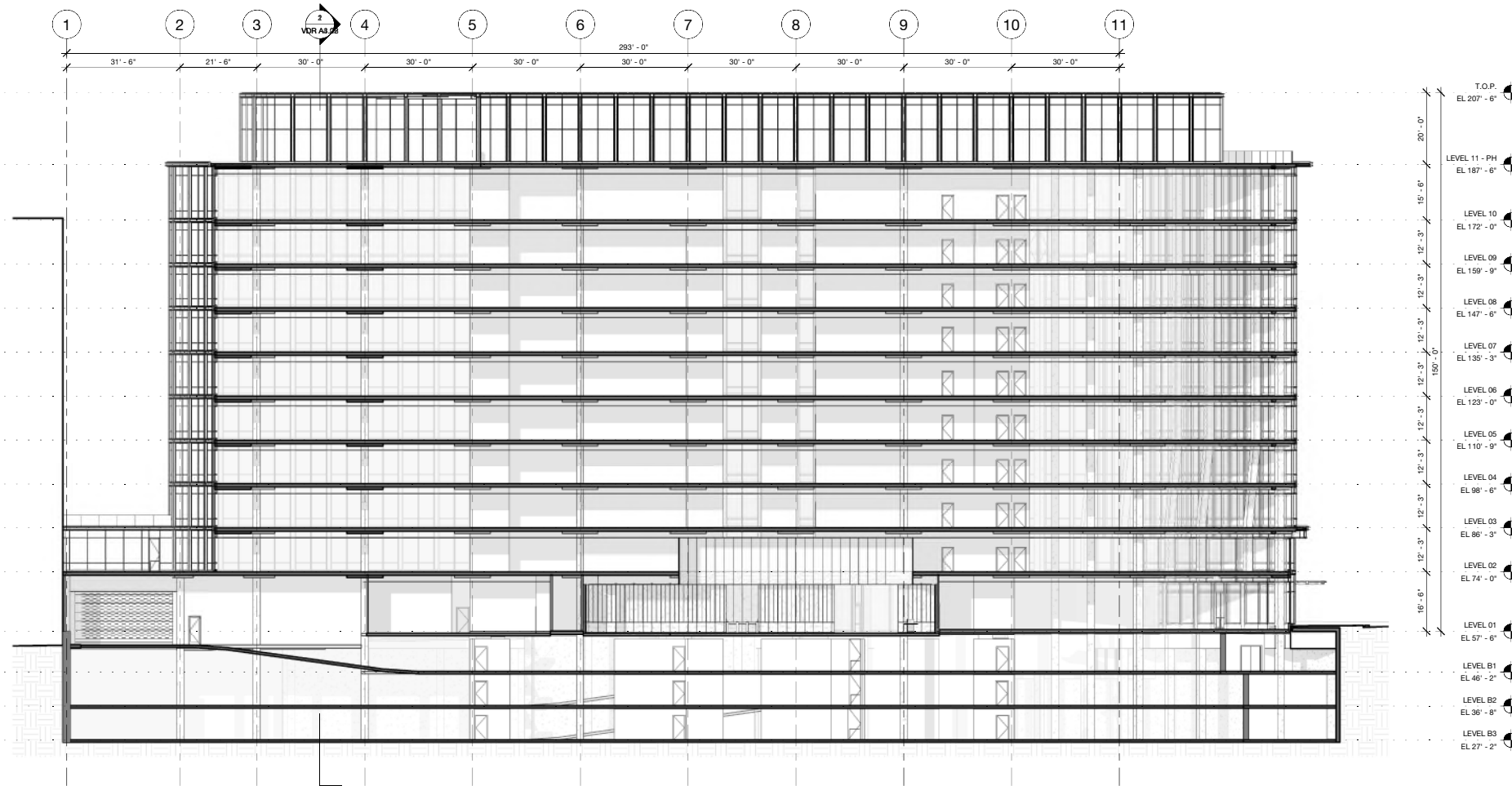
3 OVERALL ELEVATION - SOUTHWEST
1/16" = 1'-0"



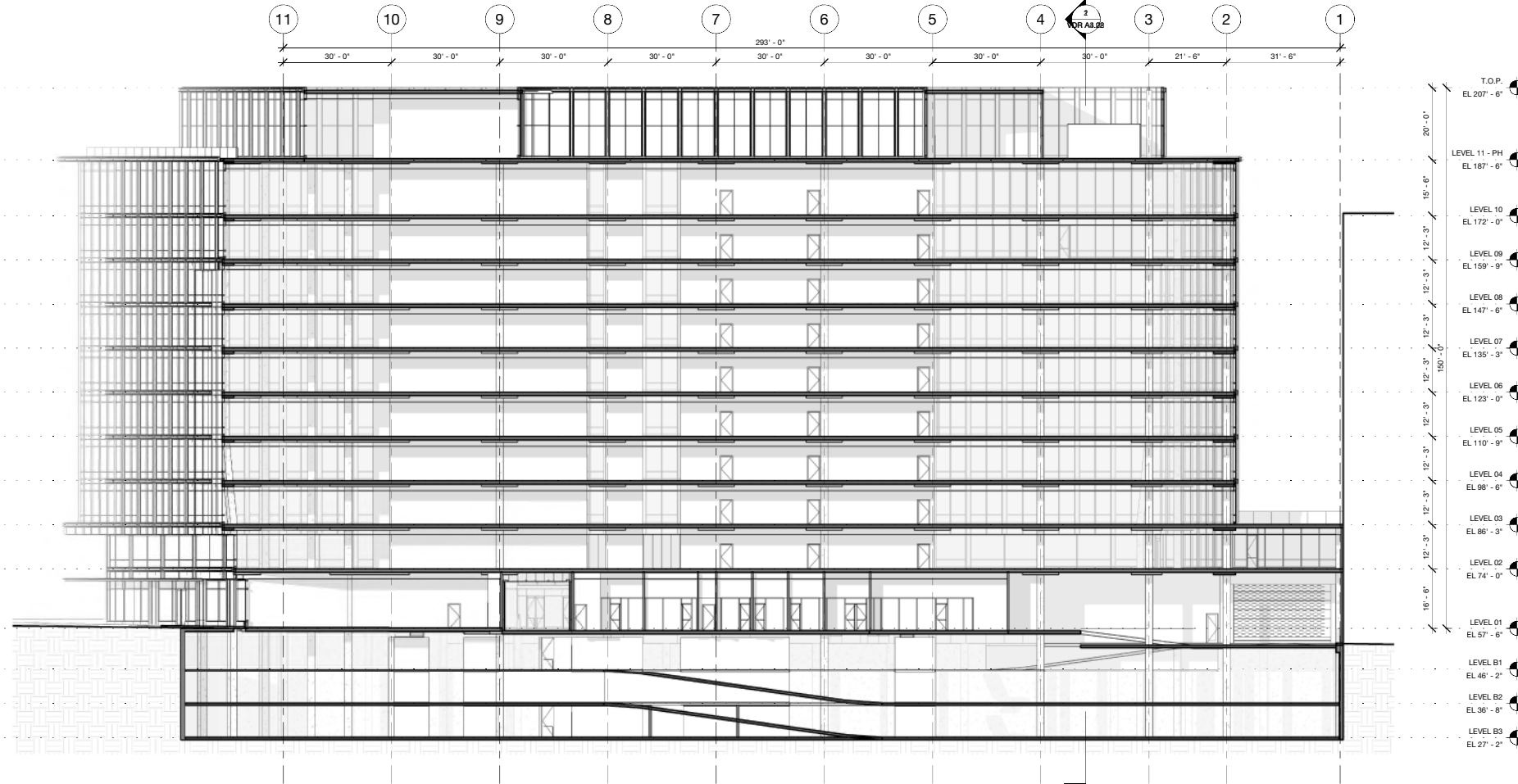
2 OVERALL ELEVATION - NORTH
1/16" = 1'-0"



4 OVERALL ELEVATION - SOUTH
1/16" = 1'-0"



1 VDR - OVERALL SECTION (LONGITUDINAL) - LOOKING WEST
1/16" = 1'-0"



2 VDR - OVERALL SECTION (LONGITUDINAL) - LOOKING EAST
1/16" = 1'-0"

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OVERALL SECTIONS - LONGITUDINAL

PROJECT: 2530
DATE: May 2026
SCALE: 1/16" = 1'-0"

SHEET NUMBER:

VDR A3.21

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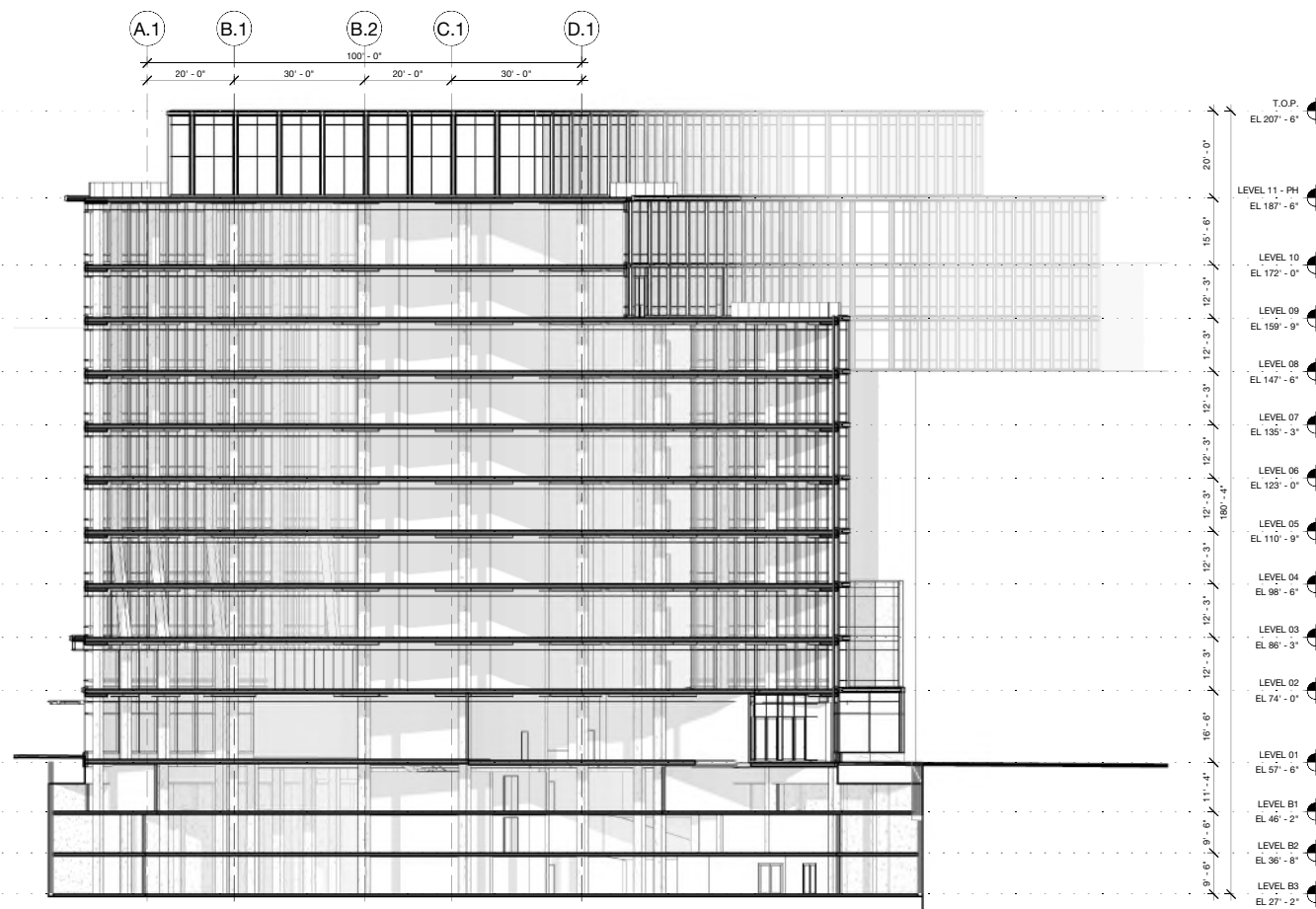
OVERALL SECTIONS - TRANSVERSE

PROJECT: 2530
DATE: May 2026
SCALE: 1/16" = 1'-0"

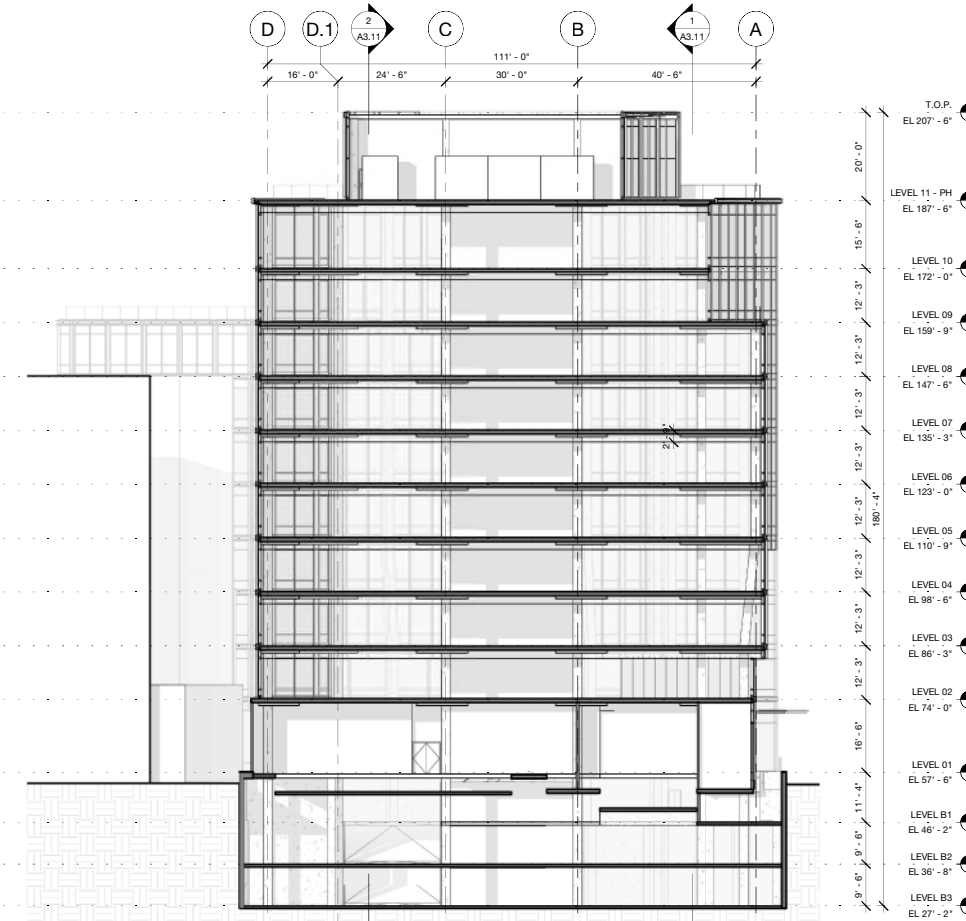
SHEET NUMBER:

VDR A3.22

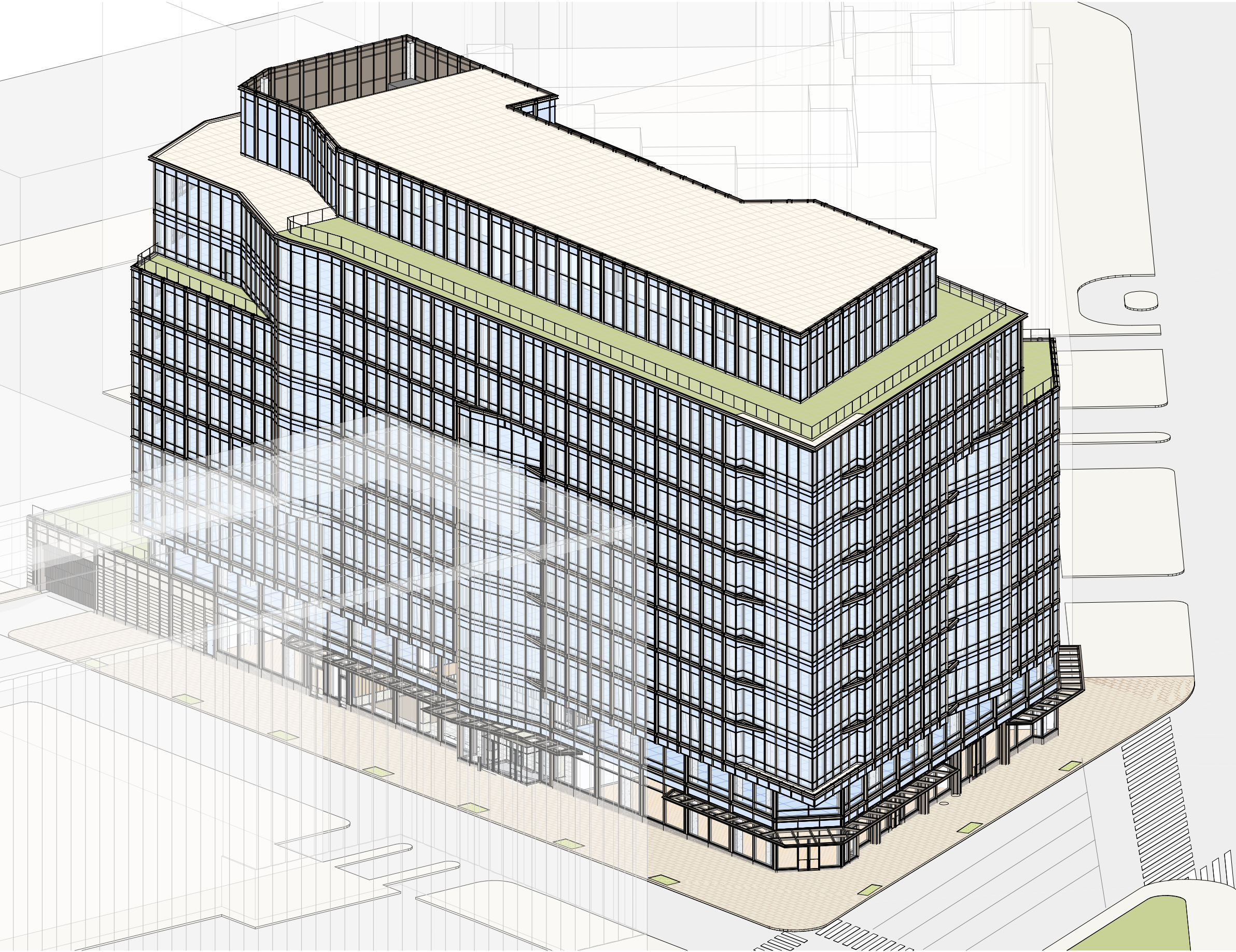
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1 VDR - OVERALL SECTION (TRANSVERSE) - LOOKING SOUTH
1/16" = 1'-0"



2 VDR - OVERALL SECTION (TRANSVERSE) - LOOKING NORTH
1/16" = 1'-0"



1 VDR - OVERALL AXONOMETRIC - NORTHEAST

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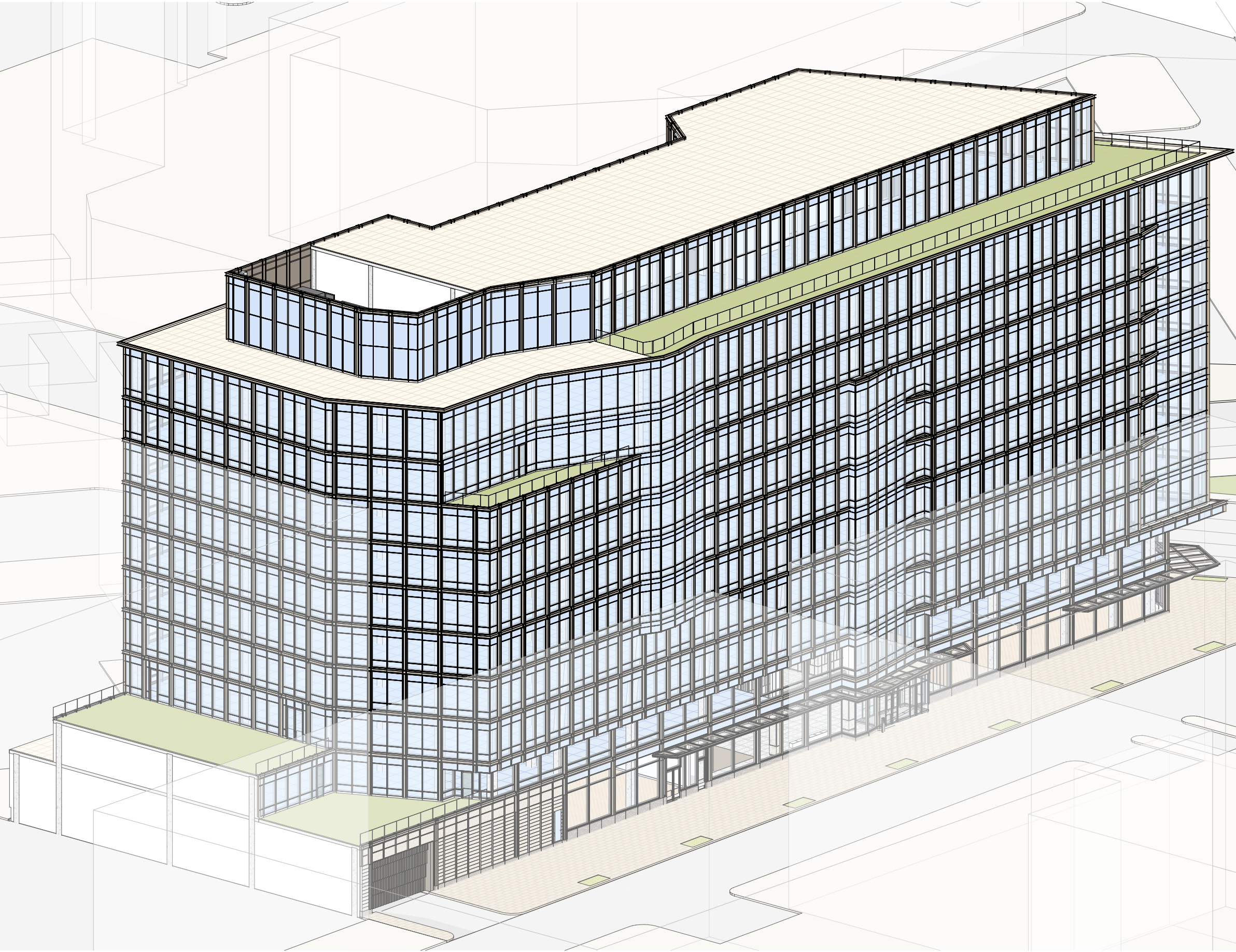
OVERALL AXONOMETRIC - NORTHEAST

PROJECT: 2530
DATE: May 2026
SCALE:

SHEET NUMBER:

VDR A4.01

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1 VDR - OVERALL AXONOMETRIC - SOUTHEAST

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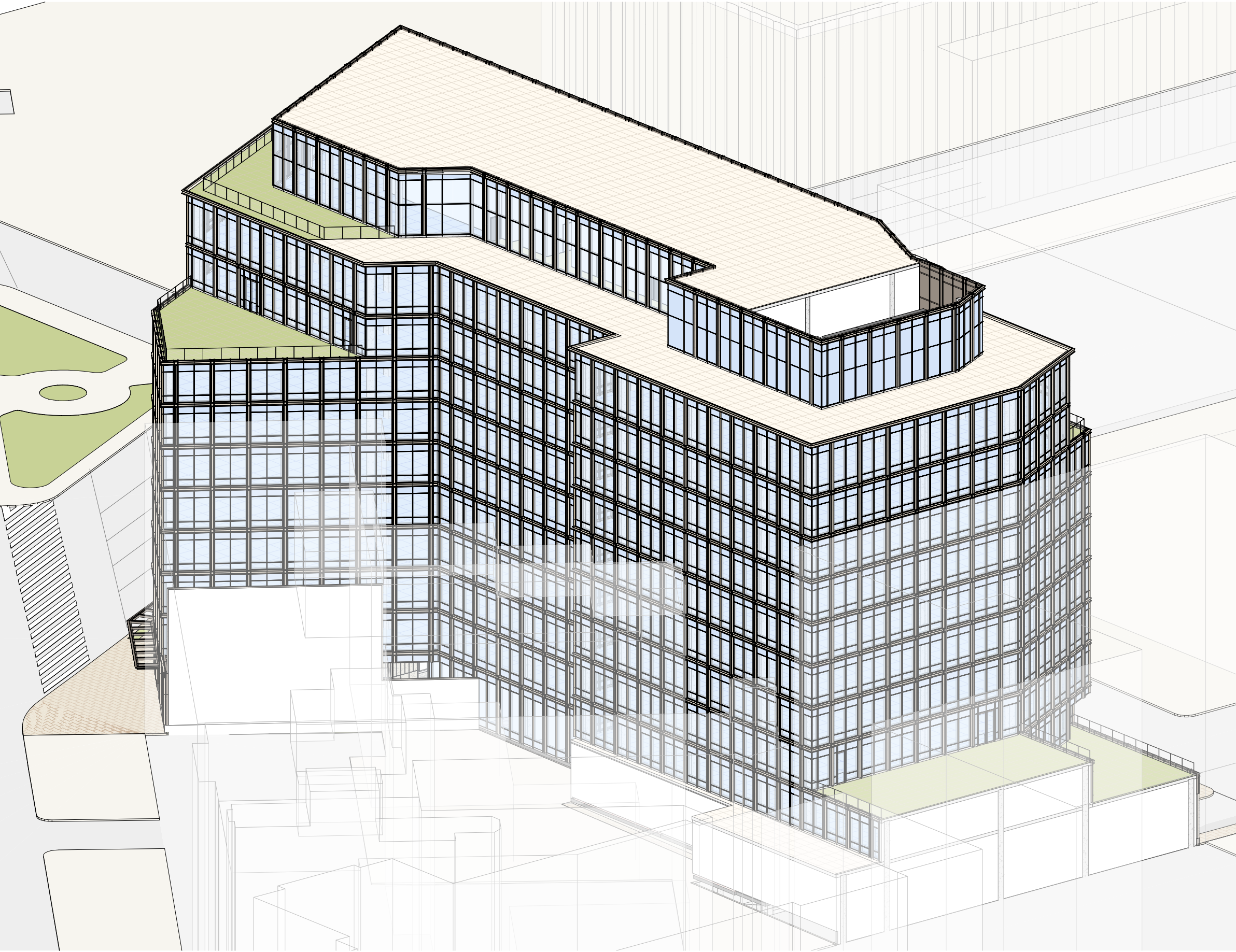
OVERALL AXONOMETRIC - SOUTHEAST

PROJECT: 2530
DATE: May 2026
SCALE:

SHEET NUMBER:

VDR A4.02

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1 VDR - OVERALL AXONOMETRIC - SOUTHWEST

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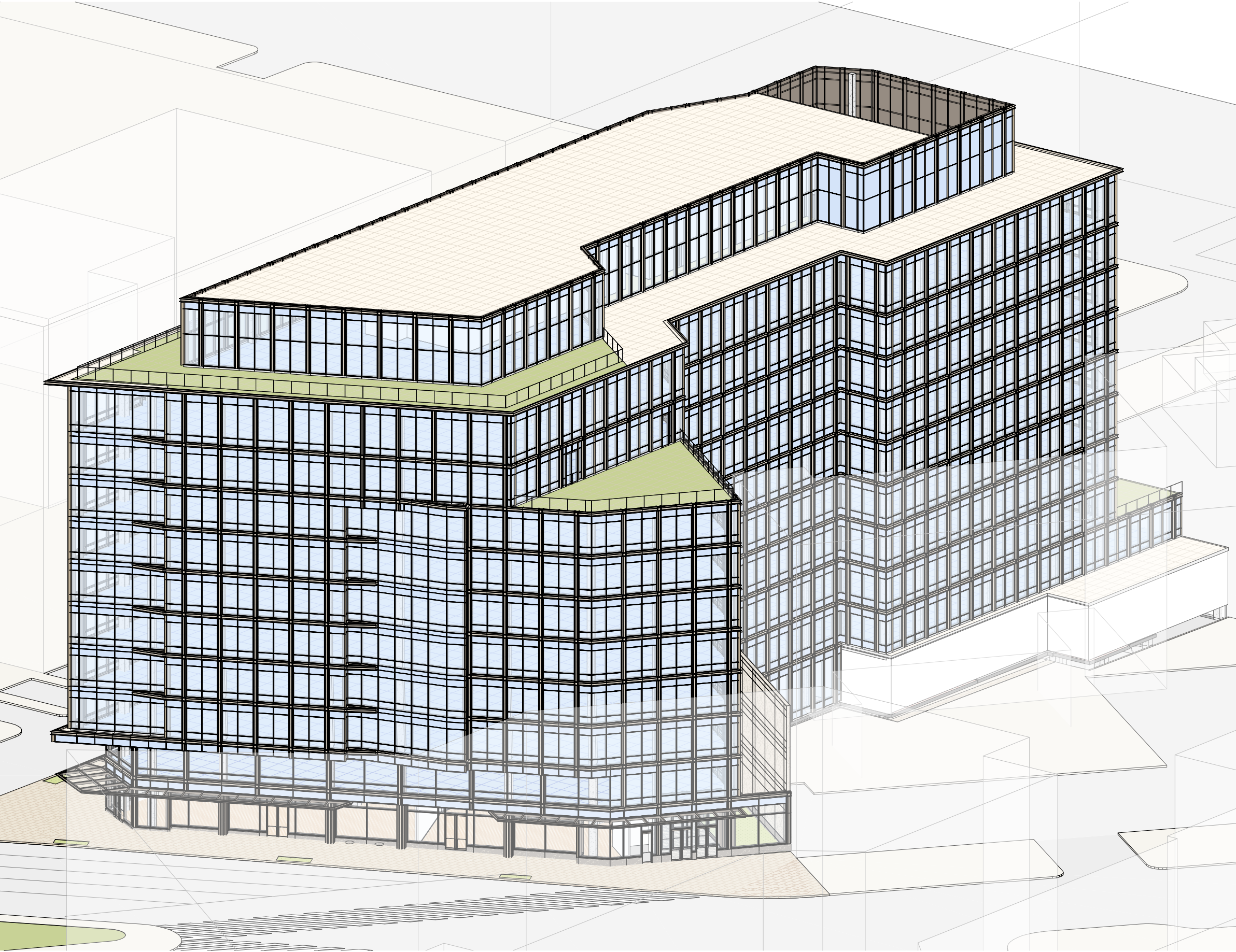
OVERALL AXONOMETRIC - SOUTHWEST

PROJECT: 2530
DATE: May 2026
SCALE:

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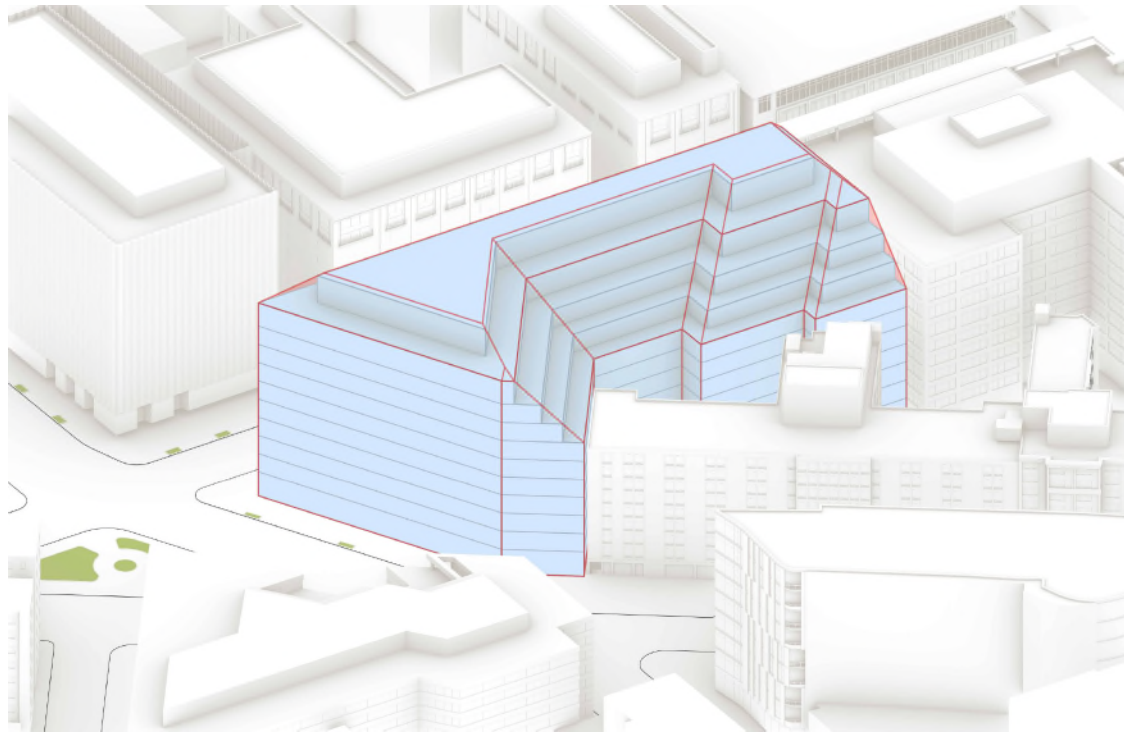
OVERALL AXONOMETRIC - NORTHWEST

PROJECT: 2530
DATE: May 2026
SCALE:

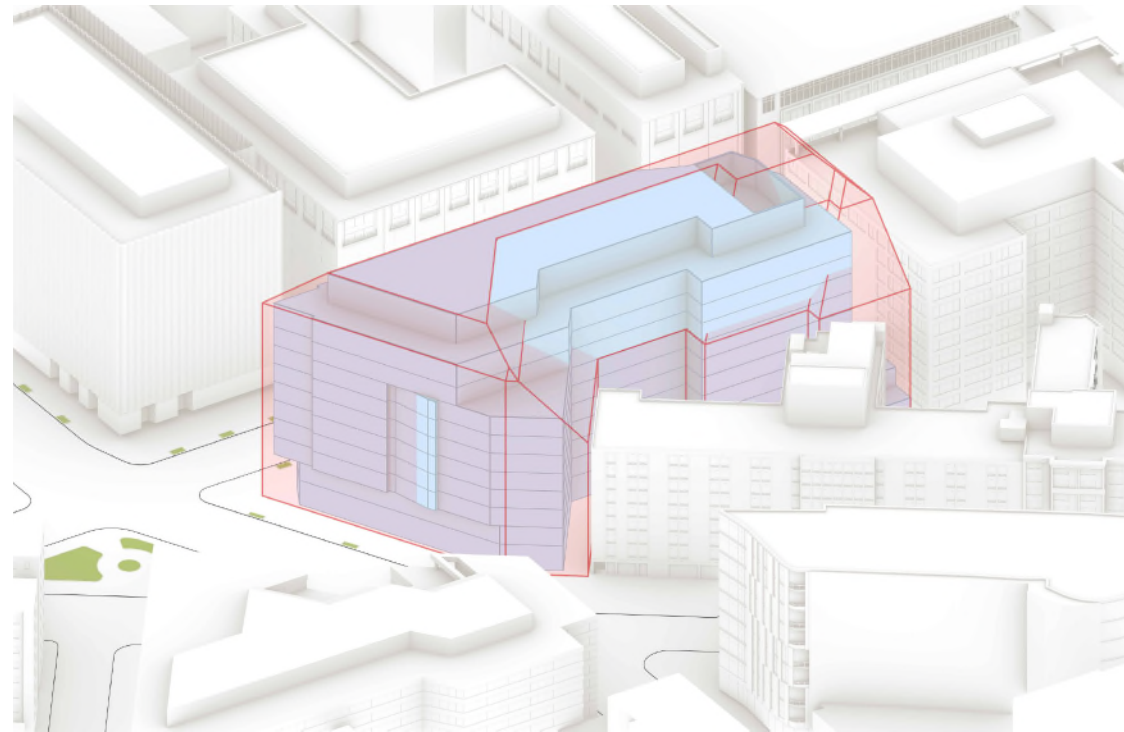
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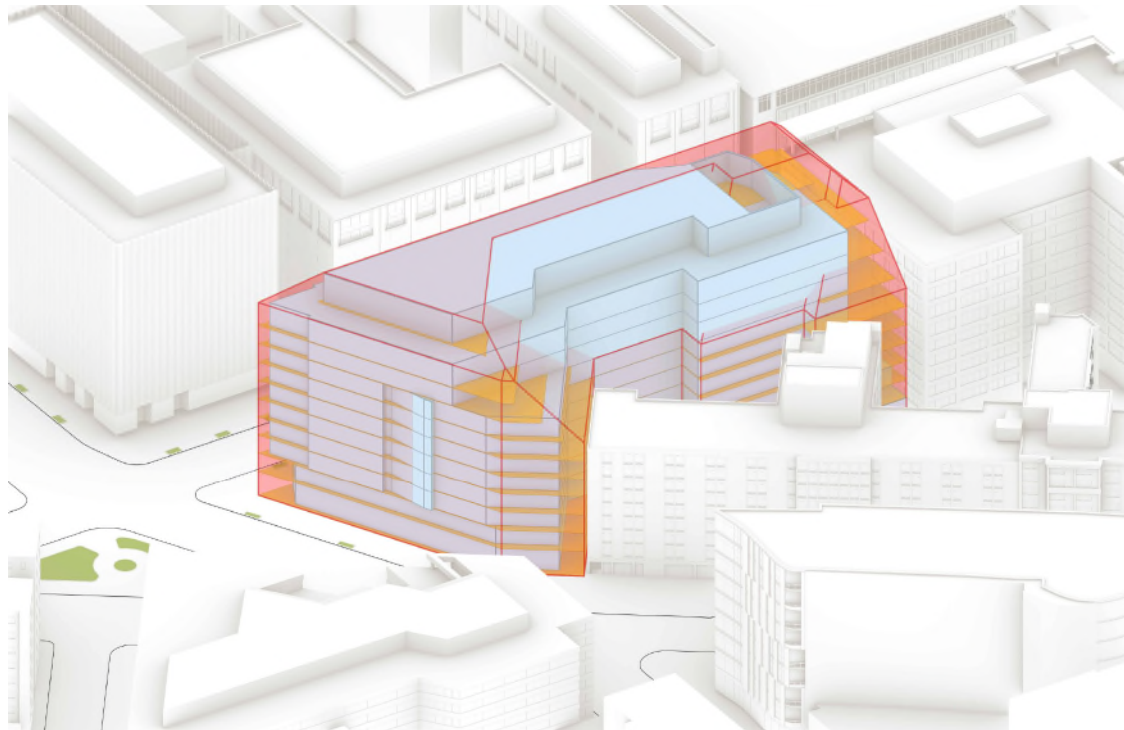
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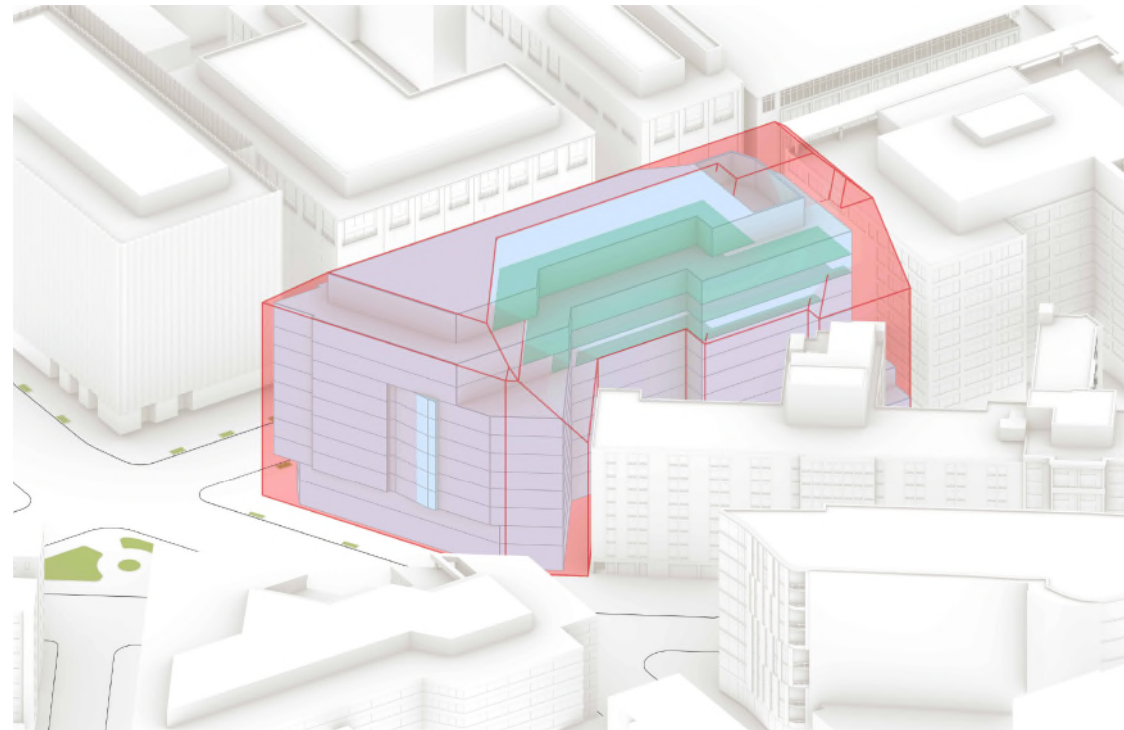
AS OF RIGHT BUILDING ENVELOPE



CONCEPTUAL MASSING OVERLAY ON AS OF RIGHT BUILDING ENVELOPE



CONCEPTUAL MASSING: AREA CARVED FROM AS OF RIGHT BUILDING ENVELOPE



CONCEPTUAL MASSING: AREA ADDED BEYOND AS OF RIGHT ENVELOPE

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ZONING SETBACK DIAGRAM - AS OF RIGHT

PROJECT: 2530
DATE: May 2026
SCALE:

SHEET NUMBER:

VDR A4.05

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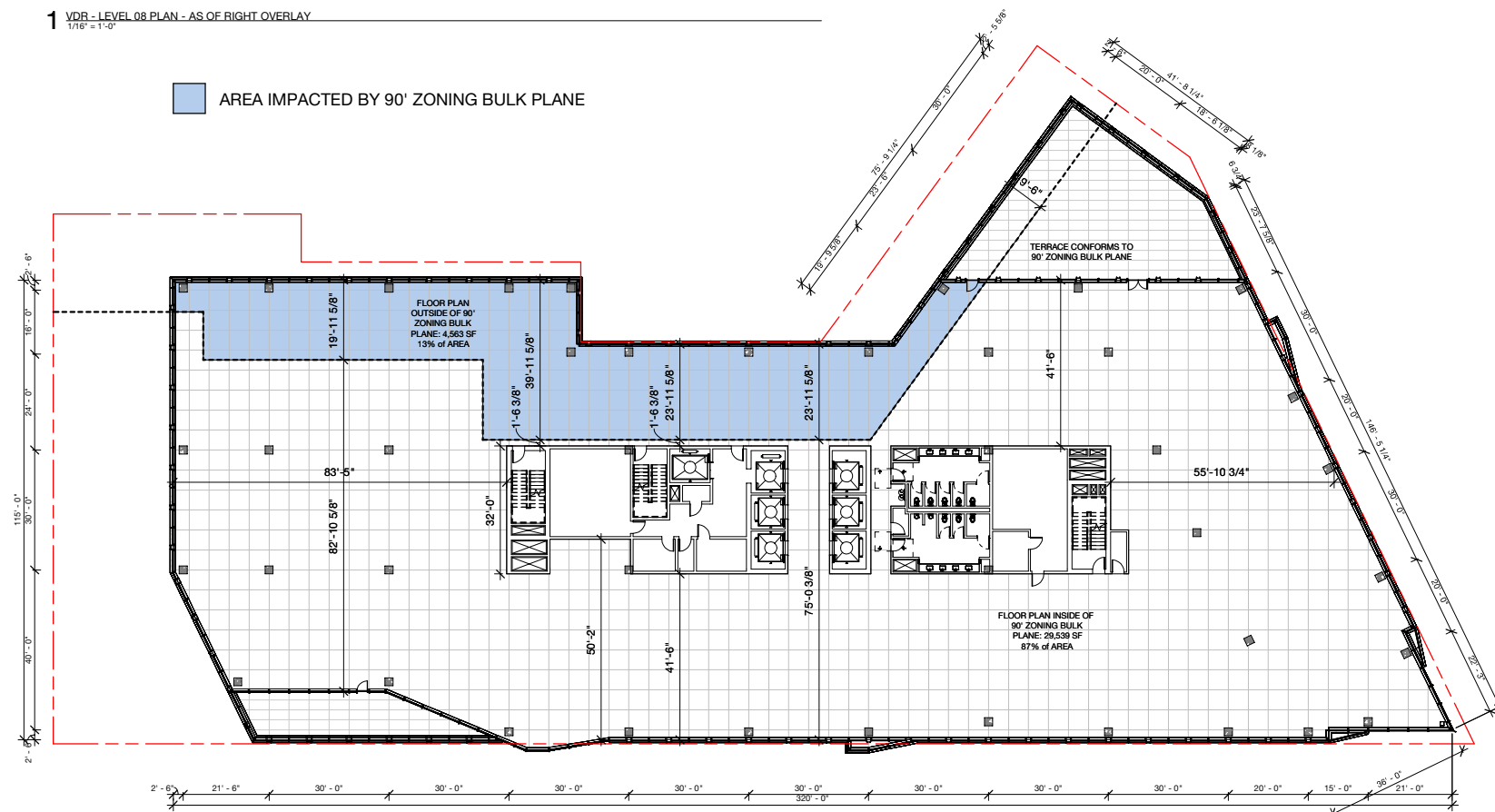
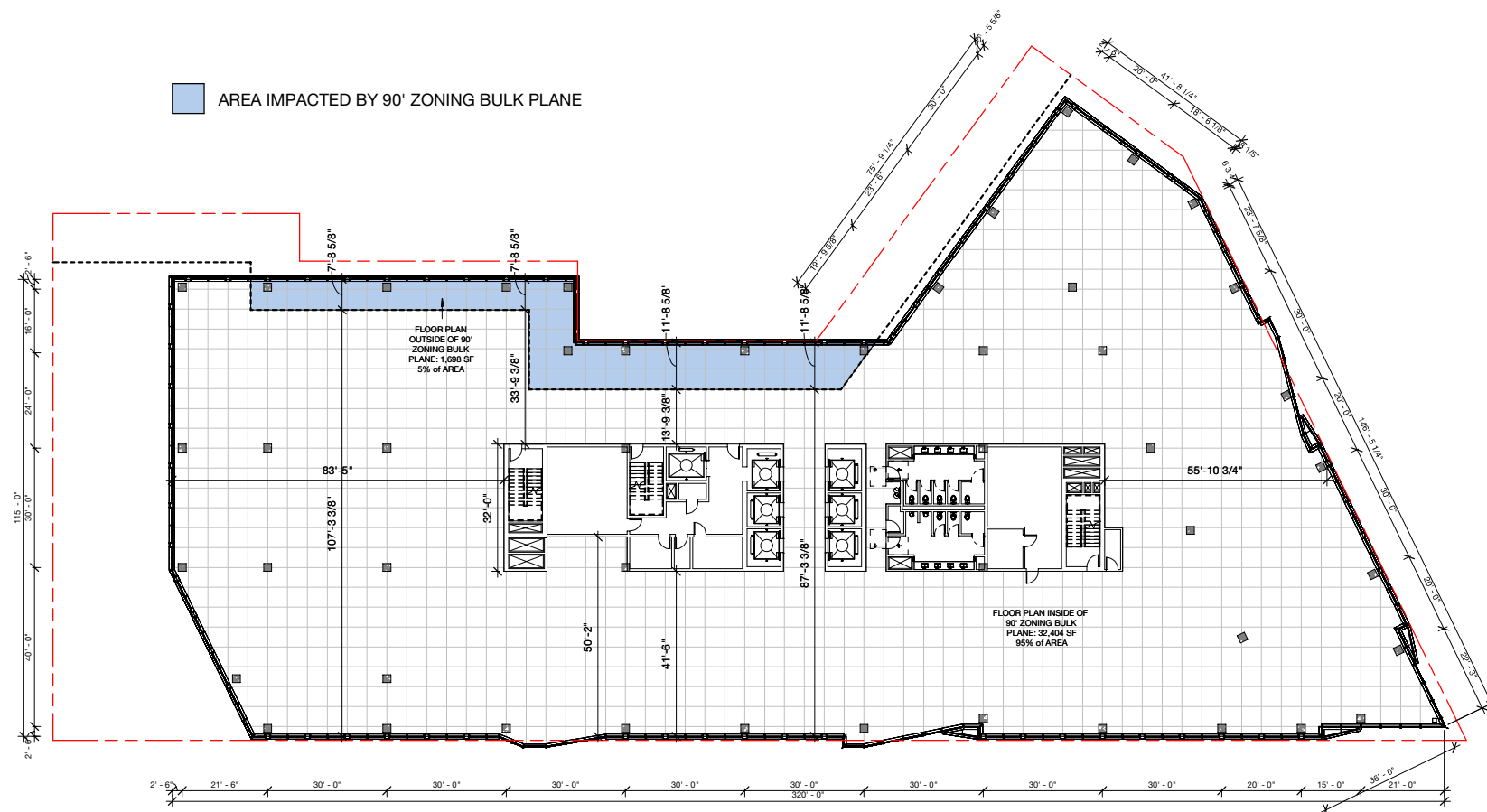
ZONING SETBACK DIAGRAM - FLOOR PLAN IMPACT

PROJECT: 2530
DATE: May 2026
SCALE: 1/16" = 1'-0"

SHEET NUMBER:

VDR A4.06

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2 VDR - LEVEL 09 PLAN - AS OF RIGHT OVERLAY
1/16" = 1'-0"

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ZONING SETBACK DIAGRAM - FLOOR PLAN IMPACT

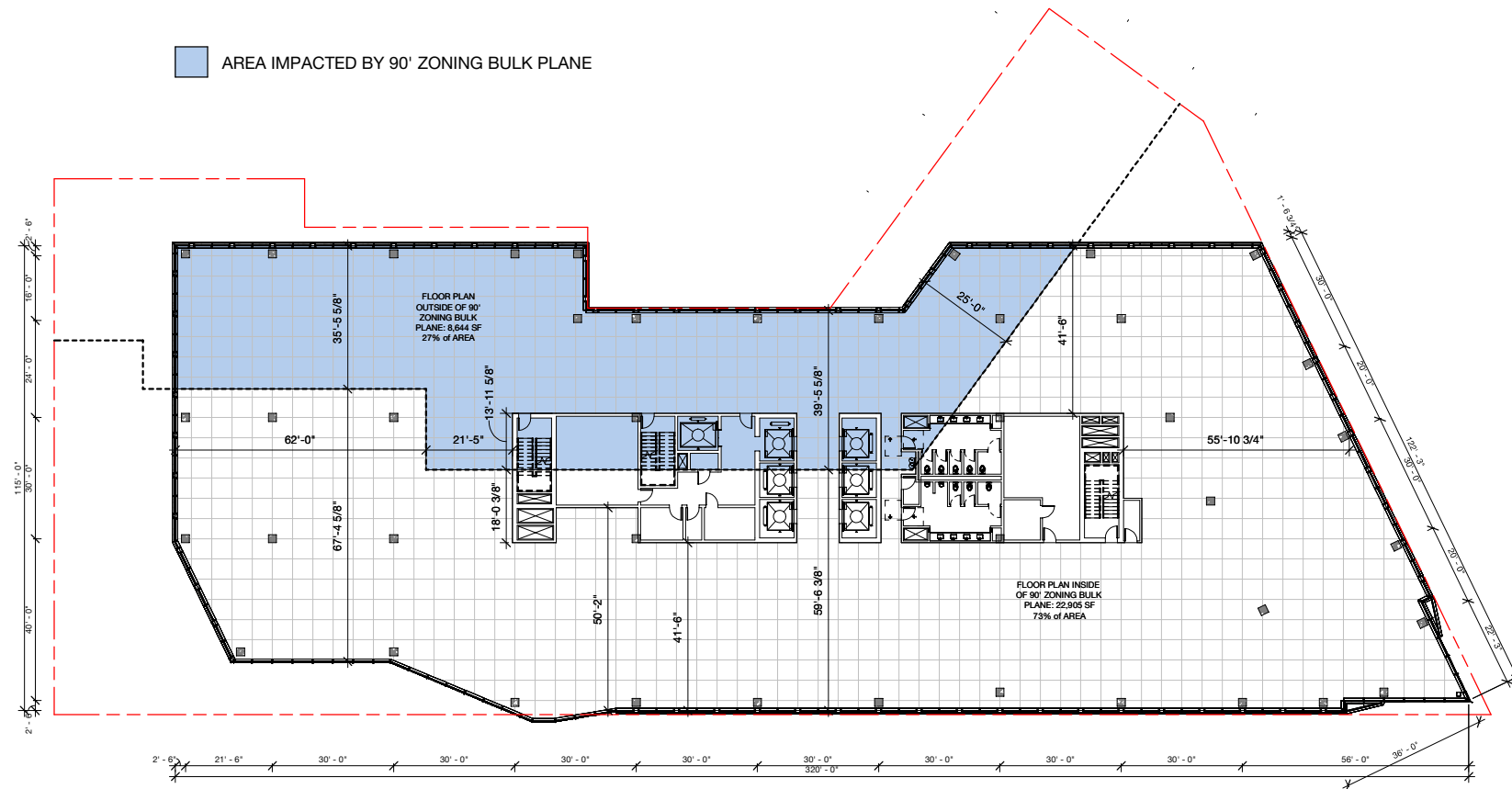
PROJECT: 2530
DATE: May 2026
SCALE: 1/16" = 1'-0"

SHEET NUMBER:

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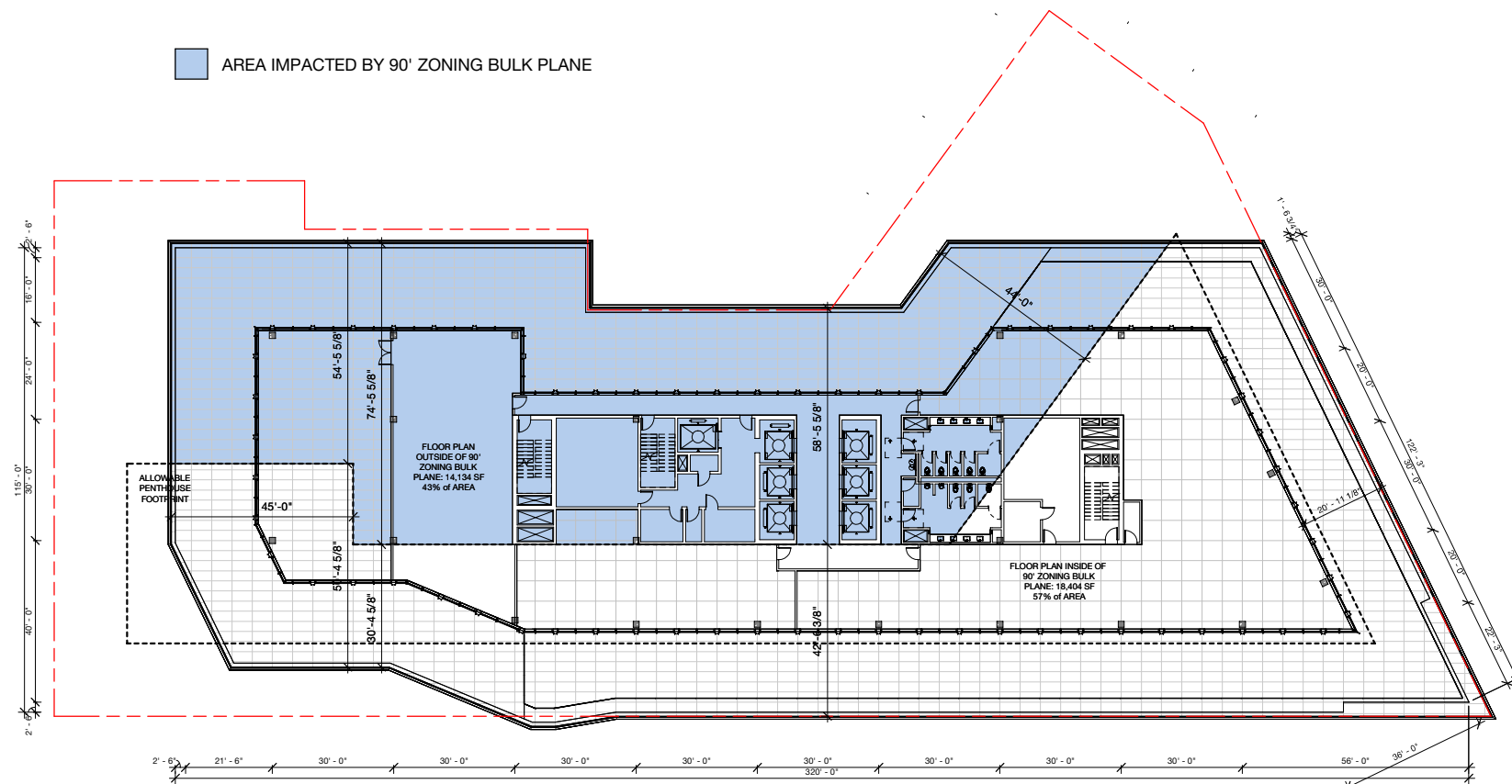
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AREA IMPACTED BY 90' ZONING BULK PLANE



1 VDR - LEVEL 10 PLAN - AS OF RIGHT OVERLAY
1/16" = 1'-0"

AREA IMPACTED BY 90' ZONING BULK PLANE



2 VDR - LEVEL 11 (PENTHOUSE) PLAN - AS OF RIGHT OVERLAY
1/16" = 1'-0"

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ZONING SETBACK DIAGRAM - SECTIONS

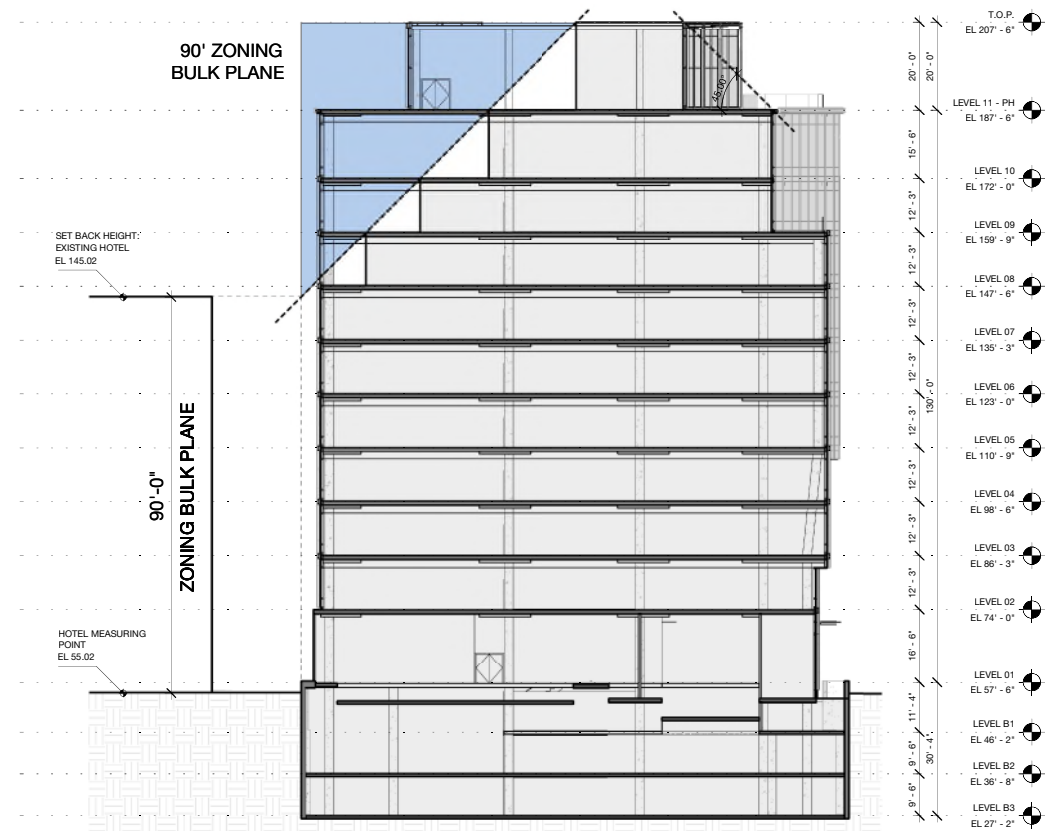
PROJECT: 2530
DATE: May 2026
SCALE: As indicated

SHEET NUMBER:

VDR A4.08

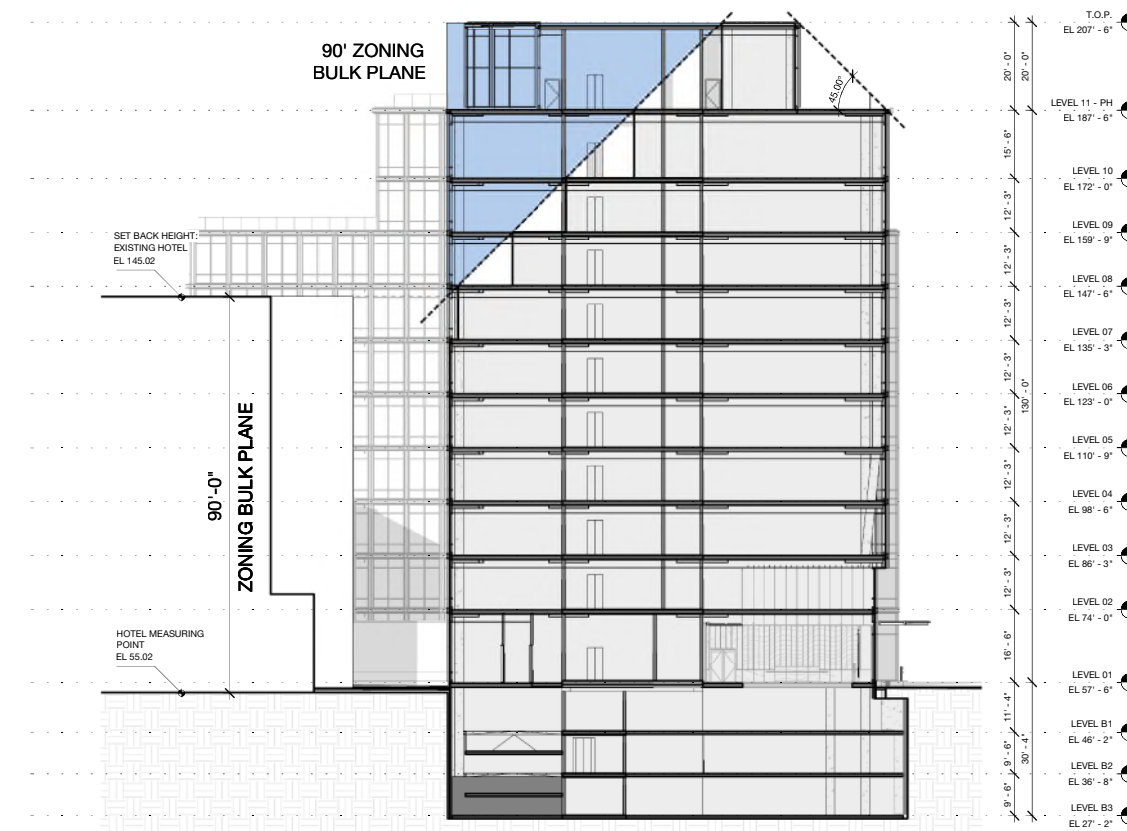
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AREA IMPACTED BY 90' ZONING BULK PLANE

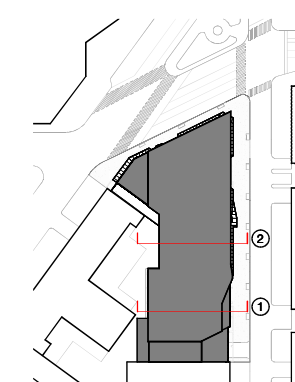


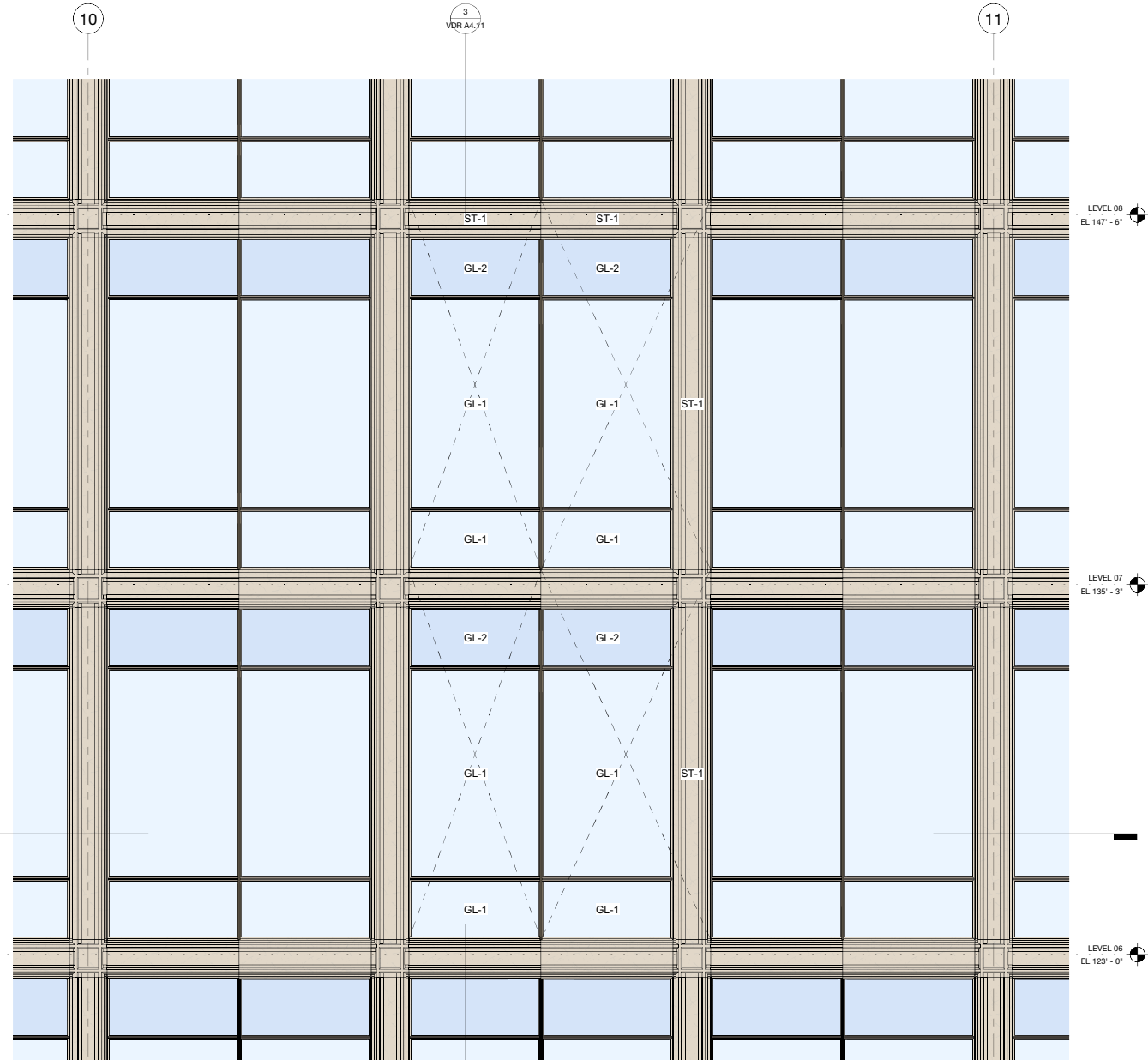
1 VDR - DIAGRAMMATIC SECTION 1 - AS OF RIGHT OVERLAY
1/16" = 1'-0"

AREA IMPACTED BY 90' ZONING BULK PLANE

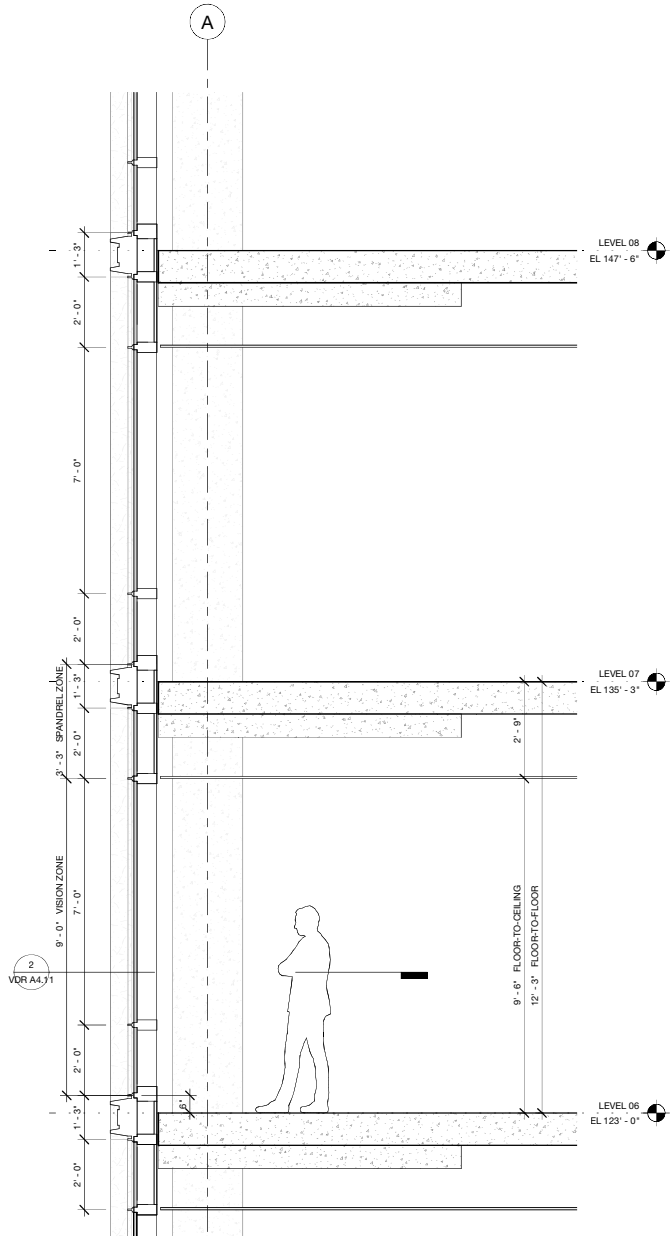


2 VDR - DIAGRAMMATIC SECTION 2 - AS OF RIGHT OVERLAY
1/16" = 1'-0"

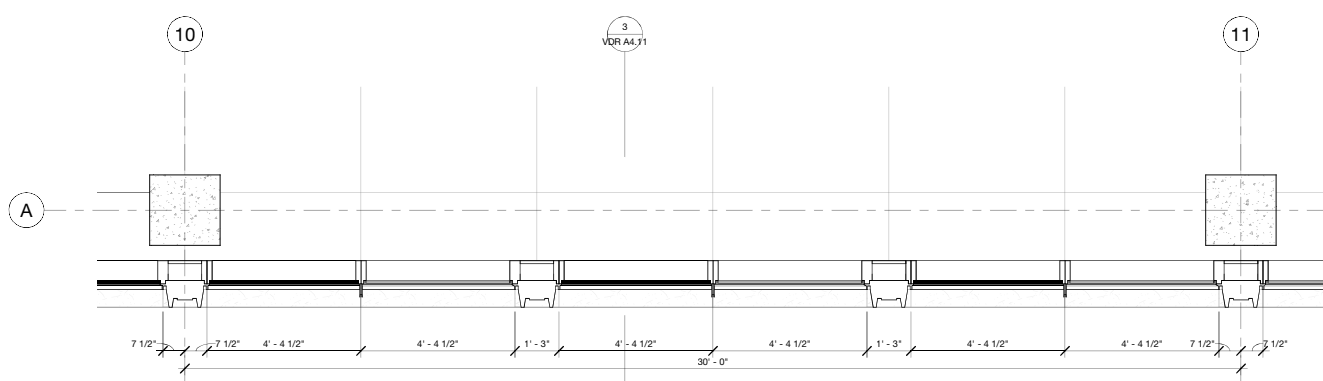




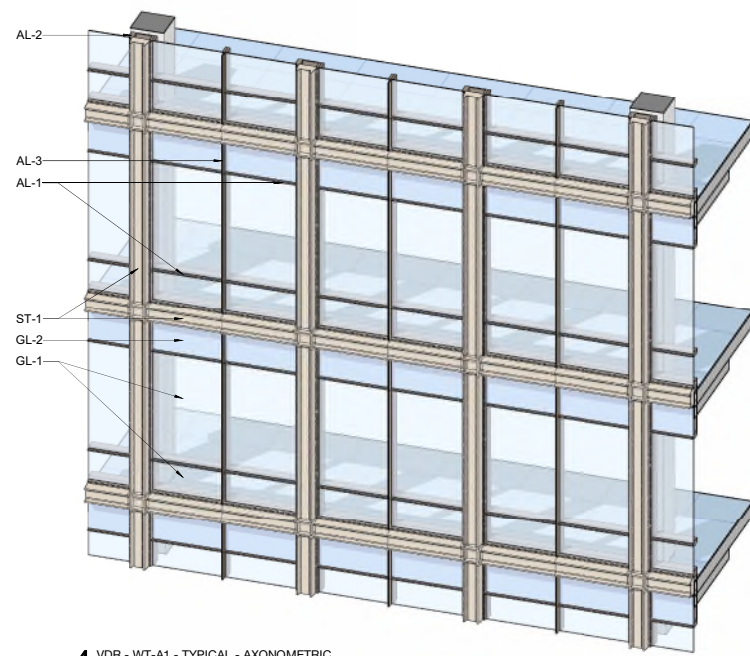
1 VDR - WT-A1 - TYPICAL - ELEVATION
1/2" = 1'-0"



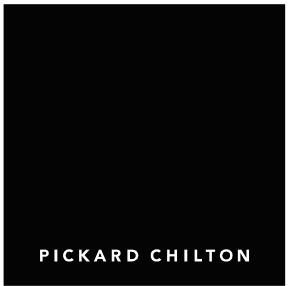
3 VDR - WT-A1 - TYPICAL - SECTION
1/2" = 1'-0"



2 VDR - WT-A1 - TYPICAL - PLAN
1/2" = 1'-0"



4 VDR - WT-A1 - TYPICAL - AXONOMETRIC



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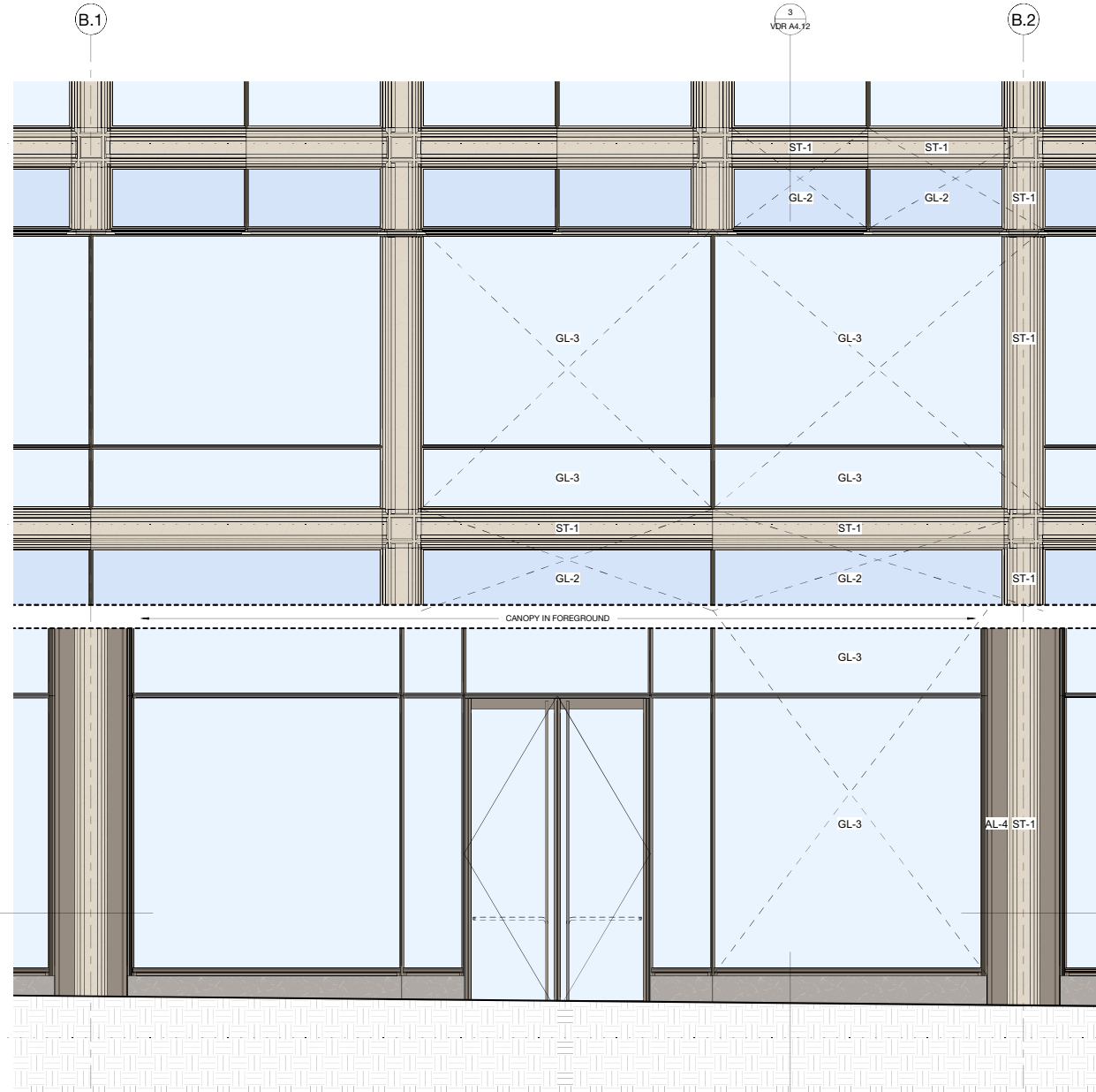
NOT FOR CONSTRUCTION

WT-A1 - TYPICAL

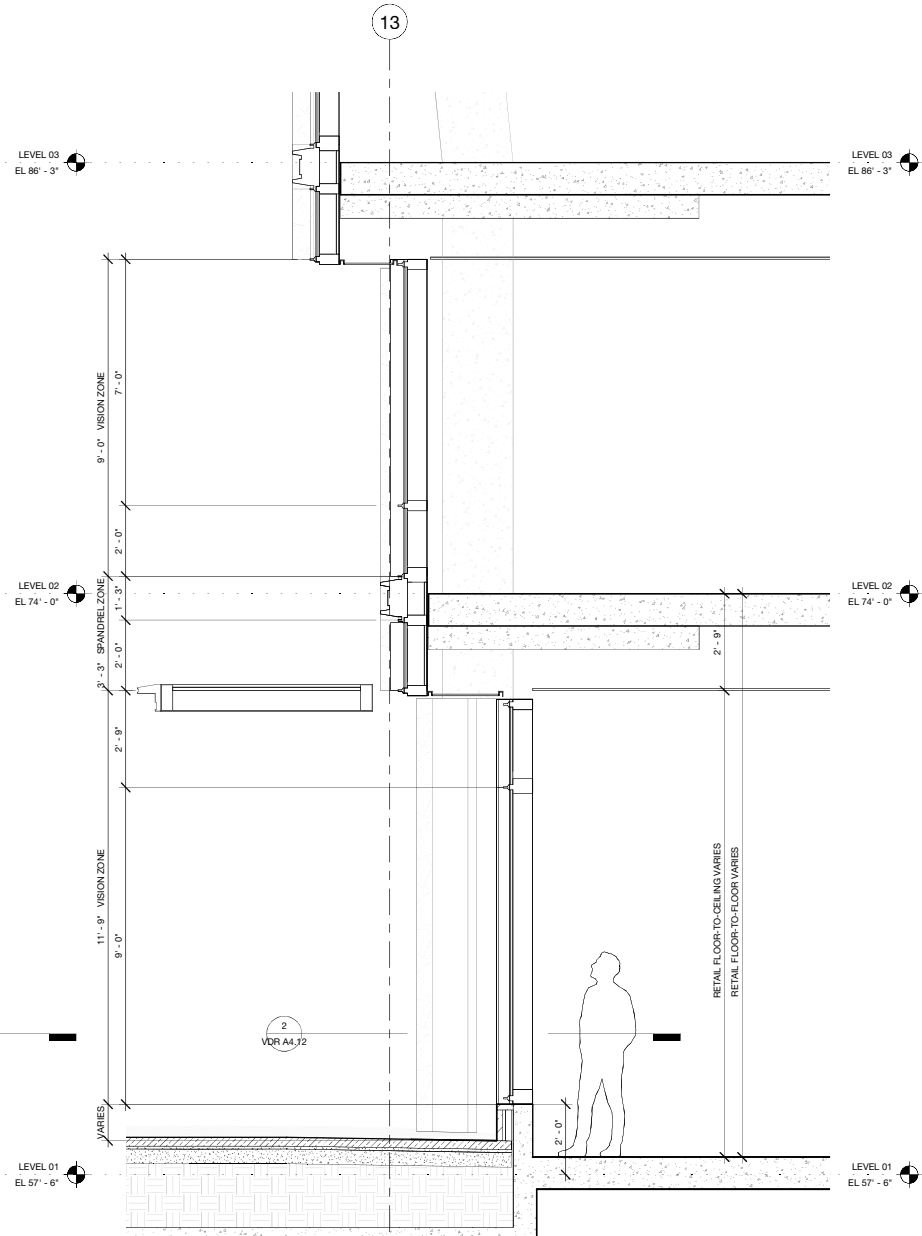
PROJECT: 2530
DATE: May 2025
SCALE: 1/2" = 1'-0"

SHEET NUMBER:
VDR A4.11

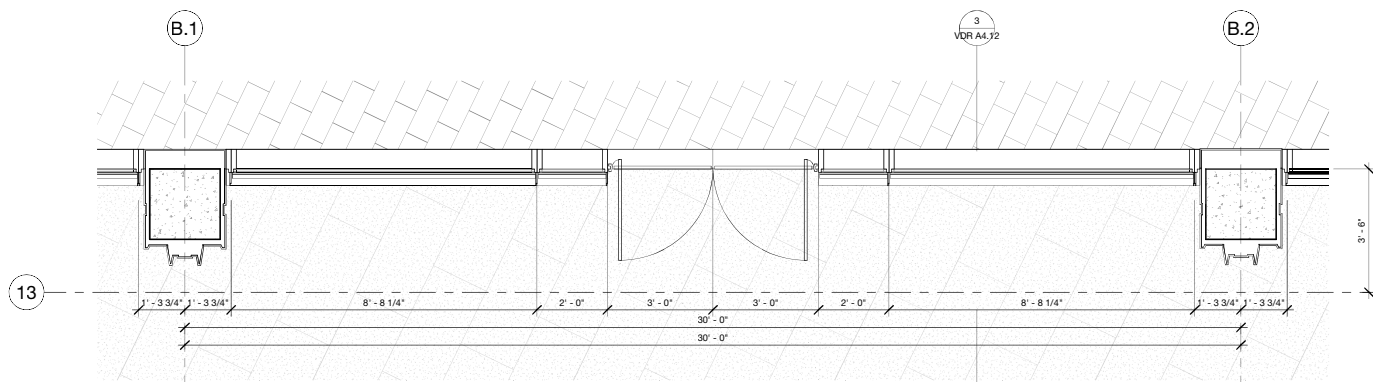
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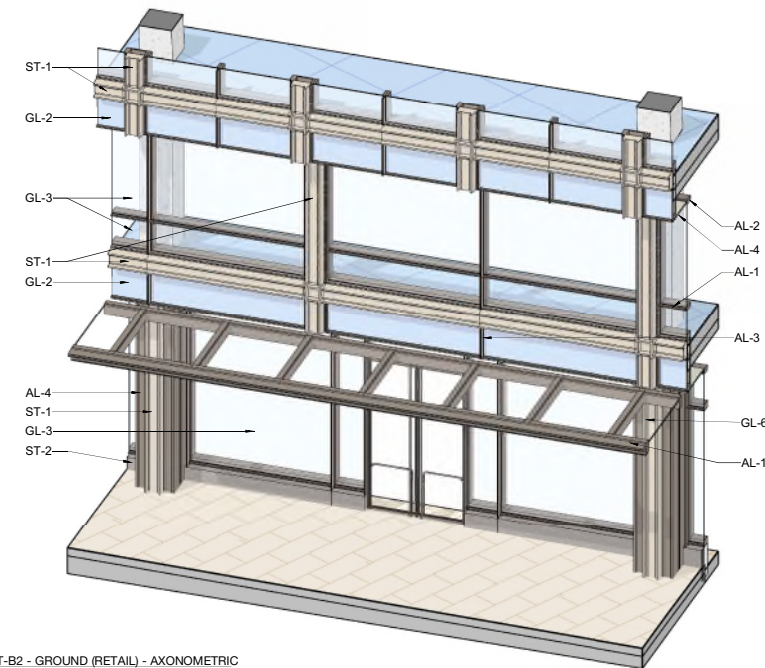
1 VDR - WT-B2 - GROUND (RETAIL) - ELEVATION
1/2" = 1'-0"



3 VDR - WT-B2 - GROUND (RETAIL) - SECTION
1/2" = 1'-0"



2 VDR - WT-B2 - GROUND (RETAIL) - PLAN
1/2" = 1'-0"



4 VDR - WT-B2 - GROUND (RETAIL) - AXONOMETRIC

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WT-B2 - GROUND LEVEL

PROJECT: 2530
DATE: May 2025
SCALE: 1/2" = 1'-0"

SHEET NUMBER:

VDR A4.12

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VIEW OF 21ST ST. FACADE

PROJECT: 2530
DATE: May 2026
SCALE:

SHEET NUMBER:
VDR A9.01

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VIEW FROM CORNER OF 21ST ST. AND M ST.

PROJECT: 2530
DATE: May 2026
SCALE:

SHEET NUMBER:

VDR A9.02

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VIEW FROM NEW HAMPSHIRE AVE.

PROJECT: 2530
DATE: May 2026
SCALE:

SHEET NUMBER:

VDR A9.03

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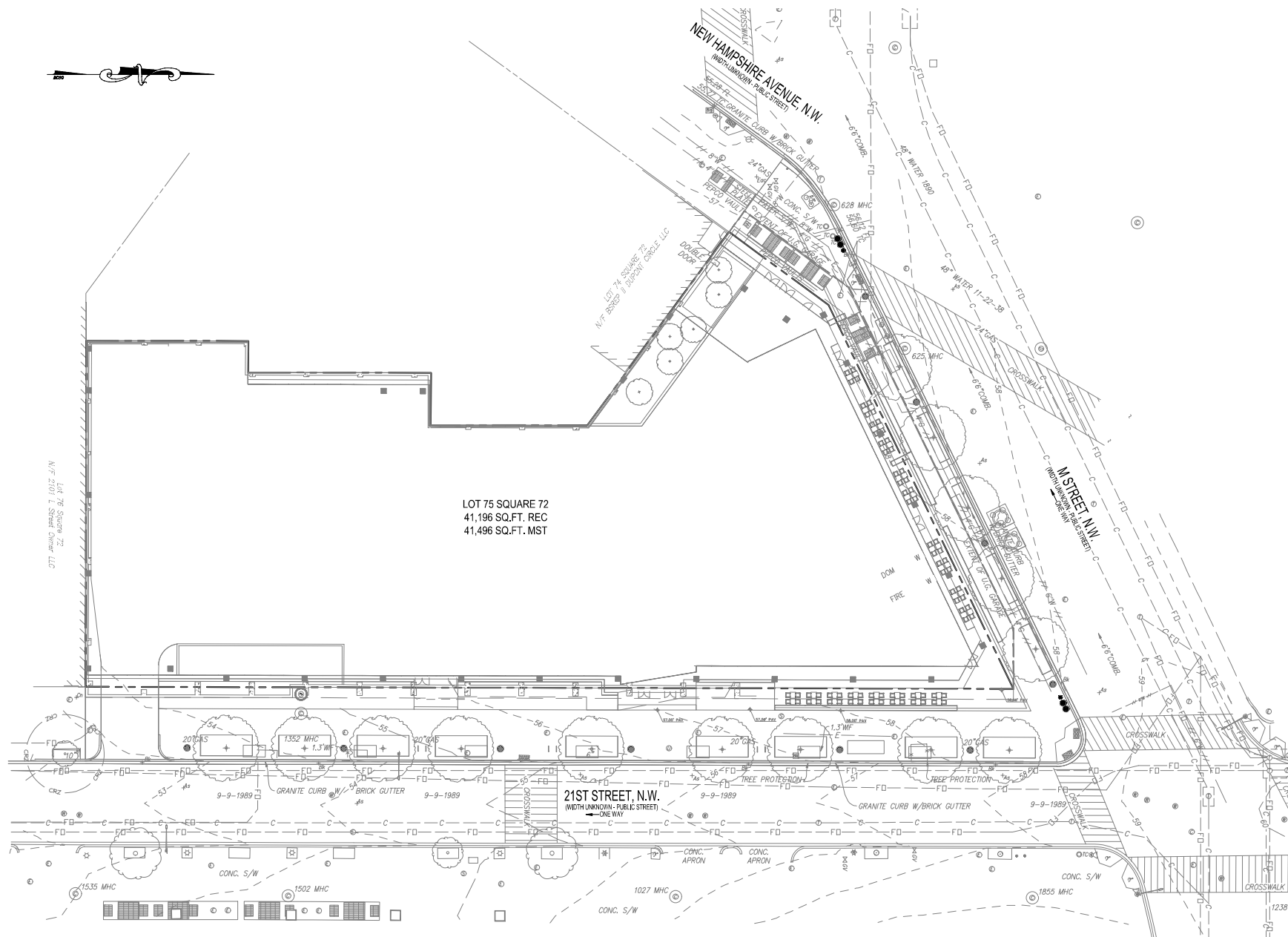
VIEW FROM M ST.

PROJECT: 2530
DATE: May 2026
SCALE:

SHEET NUMBER:

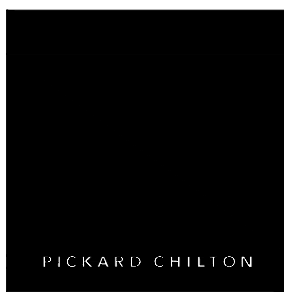
VDR A9.04

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LOT 75 SQUARE 72
41,196 SQ.FT. REC
41,496 SQ.FT. MST

21ST STREET, N.W.
(WITH UNIDIRECTIONAL TRAFFIC)
ONE WAY



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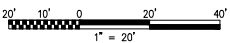
Grading Plan

PROJECT: 2530
DATE: April 2025
SCALE: See Sheet Scale

SHEET NUMBER:

VDR C1.07

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05.13.2026 VDR SUBMISSION

VDR Submission

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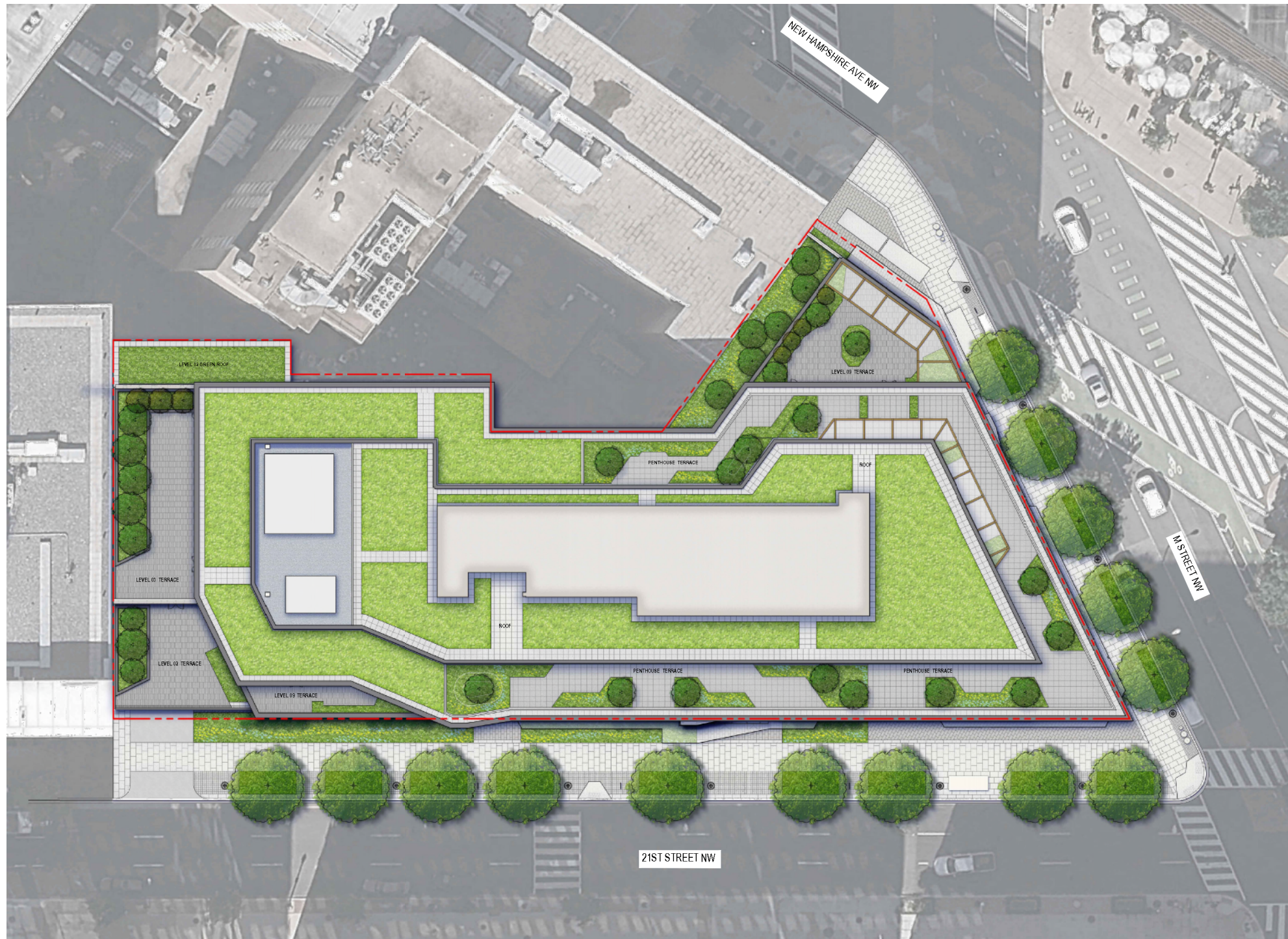
LANDSCAPE COVER SHEET

PROJECT: 2530
DATE: May 2026
SCALE: As Noted

SHEET NUMBER:
VDR L001

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Sheet Number	Sheet Title
L001	Landscape Cover Sheet
L010	GAR Plan
L101	Landscape Layout Plan - Level 01
L102	Landscape Layout Plan - Level 02
L103	Landscape Layout Plan - Level 03
L104	Landscape Layout Plan - Level 09
L105	Landscape Layout Plan - PH
L106	Landscape Layout Plan - PH
L107	Landscape Layout Plan - Roof



01 OVERALL LANDSCAPE ILLUSTRATIVE PLAN
1/16"=1'-0"

0 5 10 32 FEET



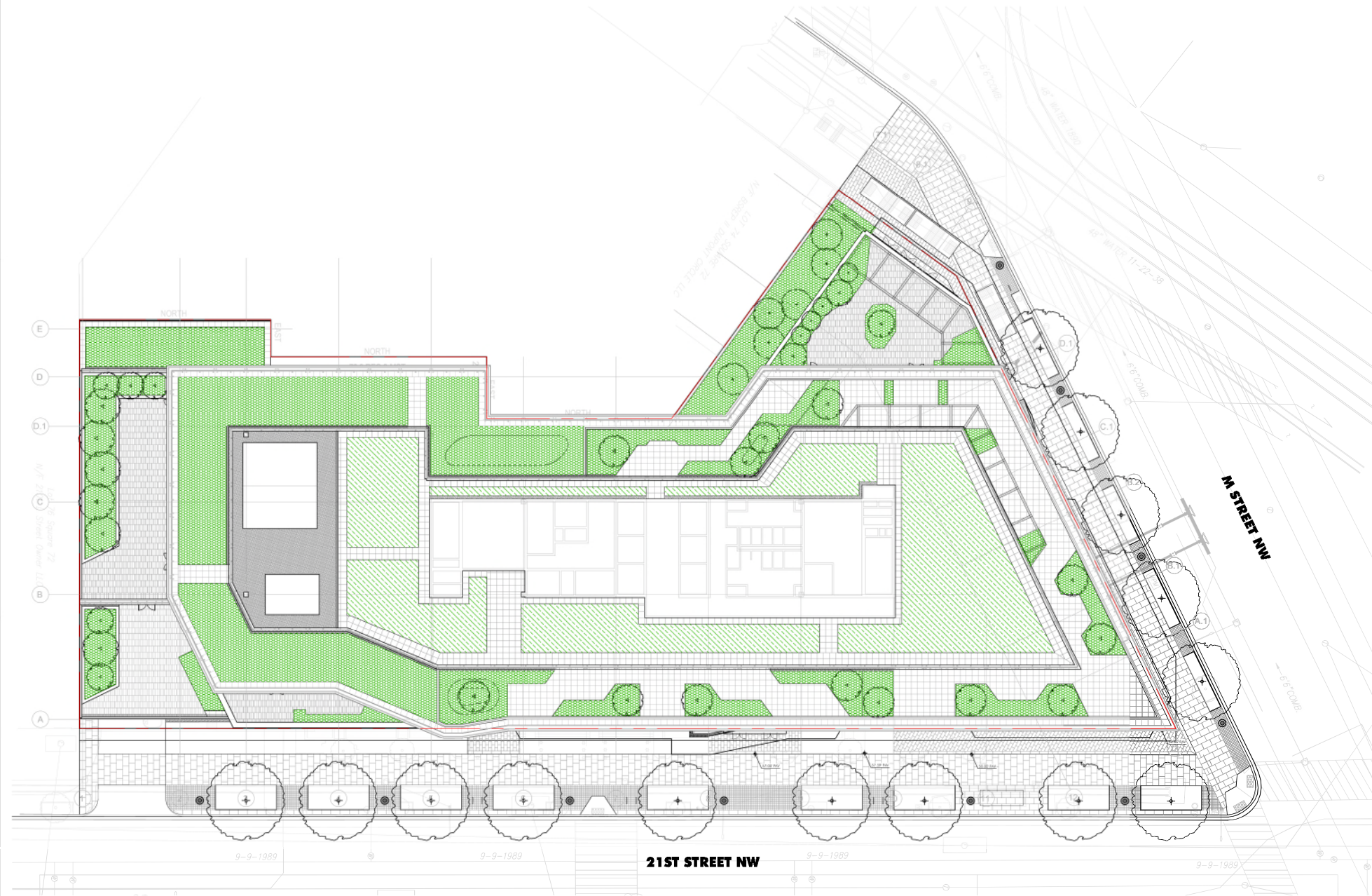
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NOTES:

- SUBJECT SITE TO BE ZONED D-5 AND REQUIRES A MINIMUM GREEN AREA RATIO (GAR) SCORE OF 0.20. THE PROJECT WILL MEET THE REQUIRED GAR SCORE FOR THE SITE.
- THE CURRENT DESIGN SHOWS POTENTIAL AREA OF LANDSCAPE AND LID TECHNIQUES TO ACHIEVE FINAL GAR SCORE. AREAS ONLY WITHIN THE APPLICABLE LOT LINES WILL BE APPLIED TO THE GAR SCORE. THE DESIGN, LAYOUT, AND SQUARE FOOTAGES OF THESE AREAS ARE TO BE FINALIZED AS THE OVERALL DESIGN DEVELOPS. AS THE PROJECT IS DEVELOPED THROUGH ALL DESIGN PHASES, ACTUAL MEANS FOR ACHIEVING THE SCORE MAY VARY AND EVOLVE.
- A COMBINATION OF PROPOSED GREEN ROOF, SHRUBS, AND GROUND COVER QUANTITIES AND SPECIES ARE TO BE DETERMINED AS THE DESIGN PROGRESSES.

GAR LEGEND

	2-8" GR	6,158 SF
	>8" GR	10,662 SF



Green Area Ratio Score Sheet		Score	Required
Total Score		41.186	0.2
Total Area		6,297	
Landscaping Elements			
A. Landscaped areas (select one of the following for each area)			
1. Landscaped area with a soil depth > 24"	0.00		
2. Landscaped area with a soil depth > 12"	0.00		
3. Maintenance facilities	0.00		
B. Plantings (credits for plants to landscaped areas from Section A)			
1. Deciduous, or other plants > 2" height	0.00		
2. Perennials > 2" height at maturity	0.00		
3. New trees with less than 40-foot canopy spread	0.00		
4. New trees with 40-foot or greater canopy spread	0.00		
5. Preservation of existing trees 6" to 12" DBH	0.00		
6. Preservation of existing trees 12" to 18" DBH	0.00		
7. Preservation of existing trees 18" to 24" DBH	0.00		
8. Preservation of existing trees 24" DBH or greater	0.00		
C. Vegetated or "green" roofs			
1. Green of least 2" soil less than 8" of growth medium	6.158	0.00	3,094.8
2. Green of least 8" of growth medium	10,662	0.00	5,291.4
D. Permeable Paving***			
1. Permeable paving over 6" to 24" of soil or gravel	0.00		
2. Permeable paving over at least 24" of soil or gravel	0.00		
E. Other			
1. Enhanced tree growth systems***	0.00		
2. Renewable energy generation	0.00		
3. Approved water features	0.00		
F. Revenues			
1. Multi-use open space	0.00		
2. Landscaping or food cultivation	0.00		
3. Maintenance contractor engagement	0.00		
Total Score		41.186	0.2

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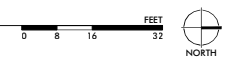
GAR PLAN

PROJECT: 2530
DATE: May 2026
SCALE: As Noted

SHEET NUMBER:
VDR L010

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01 GAR PLAN
1/16"=1'-0"



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LANDSCAPE LAYOUT PLAN - LEVEL 01

PROJECT: 2530

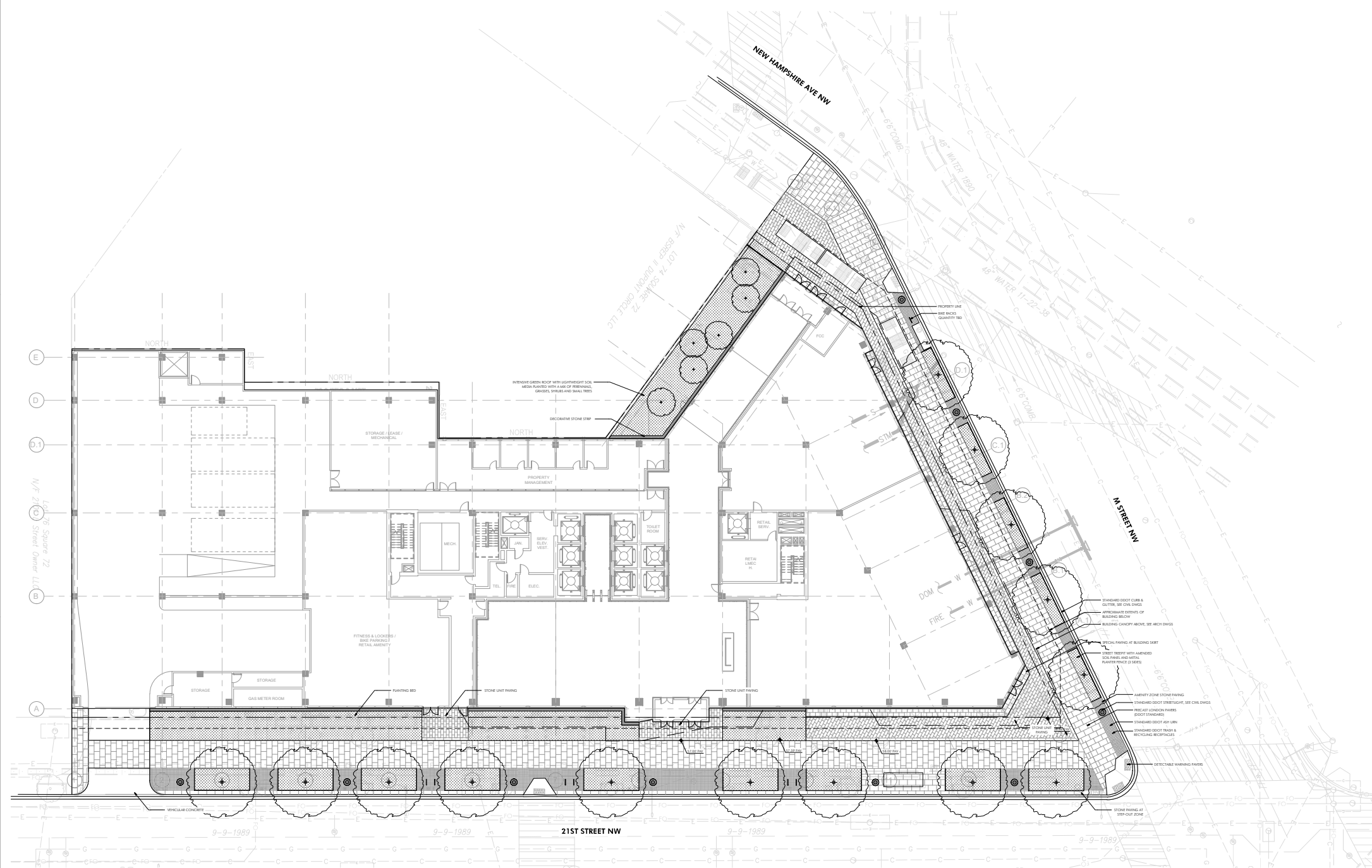
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SCALE: As Noted

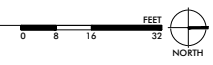
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01 LANDSCAPE LAYOUT PLAN - LEVEL 01
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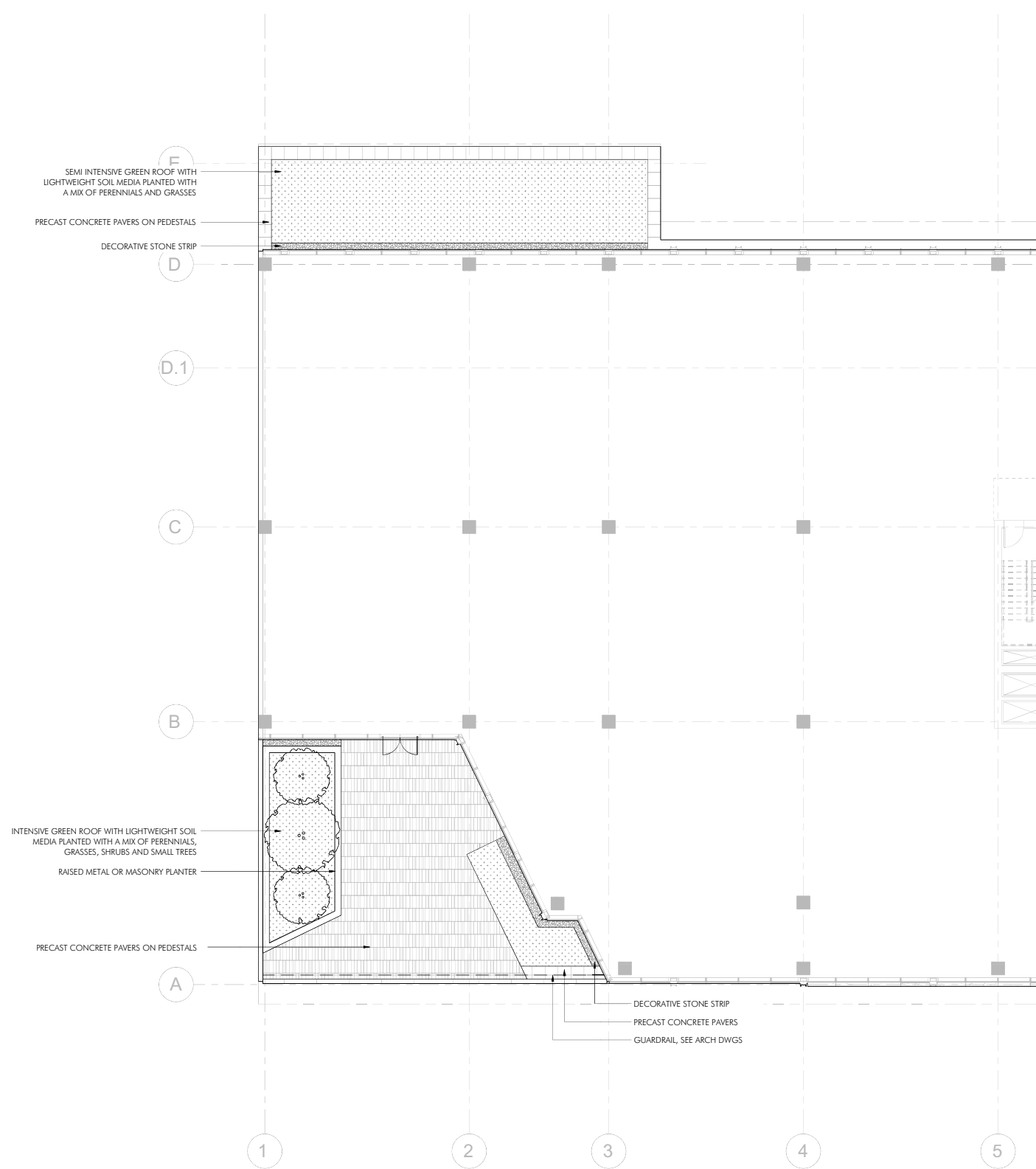
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LANDSCAPE LAYOUT PLAN - LEVEL 02

PROJECT: 2530
DATE: May 2026
SCALE: As Noted

SHEET NUMBER:
VDR L102

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F
SEMI INTENSIVE GREEN ROOF WITH LIGHTWEIGHT SOIL MEDIA PLANTED WITH A MIX OF PERENNIALS AND GRASSES

PRECAST CONCRETE PAVERS ON PEDESTALS

D
DECORATIVE STONE STRIP

A
INTENSIVE GREEN ROOF WITH LIGHTWEIGHT SOIL MEDIA PLANTED WITH A MIX OF PERENNIALS, GRASSES, SHRUBS AND SMALL TREES

RAISED METAL OR MASONRY PLANTER

PRECAST CONCRETE PAVERS ON PEDESTALS

DECORATIVE STONE STRIP

PRECAST CONCRETE PAVERS

GUARDRAIL, SEE ARCH DWGS

01 LANDSCAPE LAYOUT PLAN - LEVEL 02
1/8" = 1'-0"



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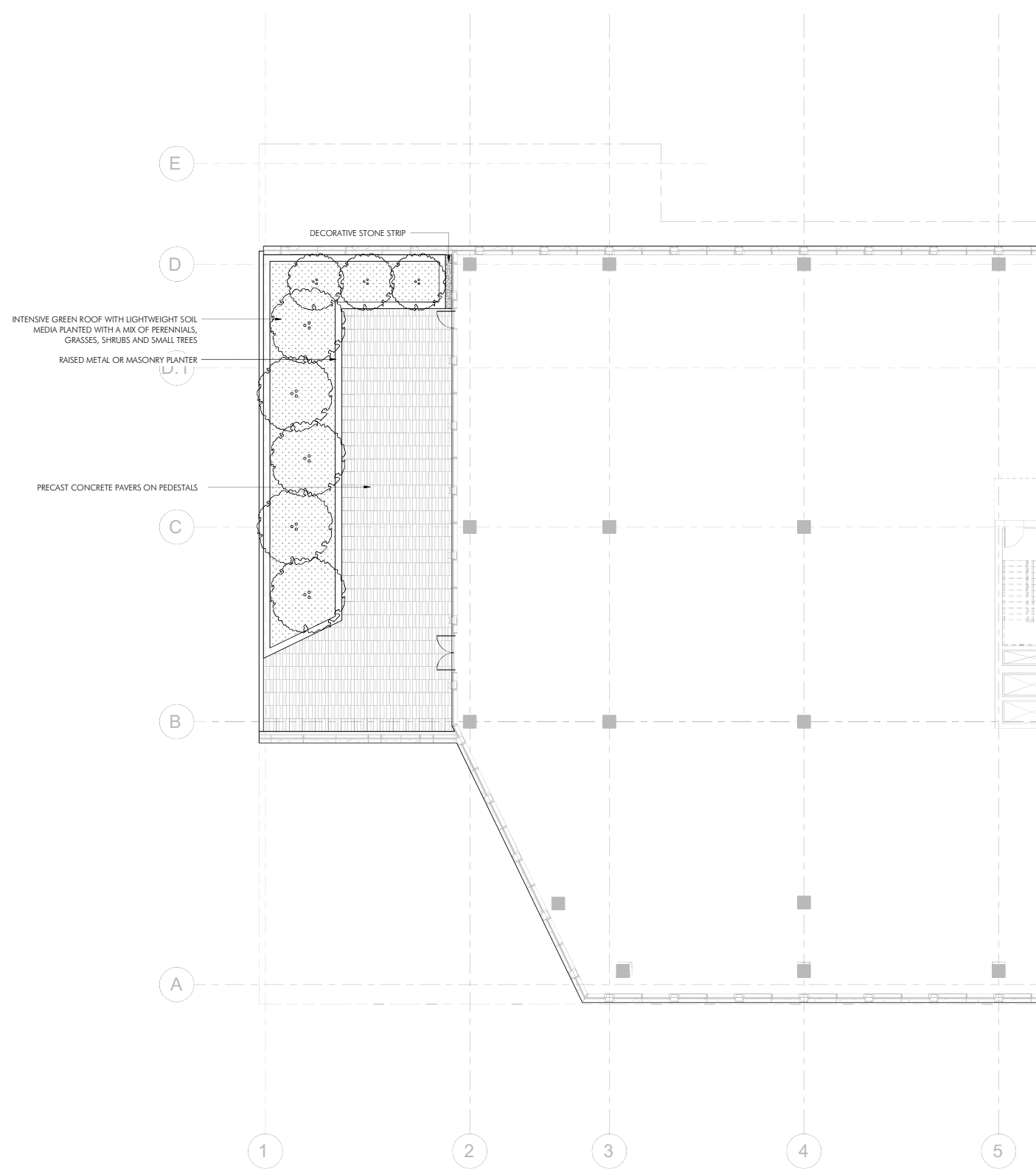
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LANDSCAPE LAYOUT PLAN - LEVEL 03

PROJECT: 2530
DATE: May 2026
SCALE: As Noted

SHEET NUMBER:
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01 LANDSCAPE LAYOUT PLAN - LEVEL 03
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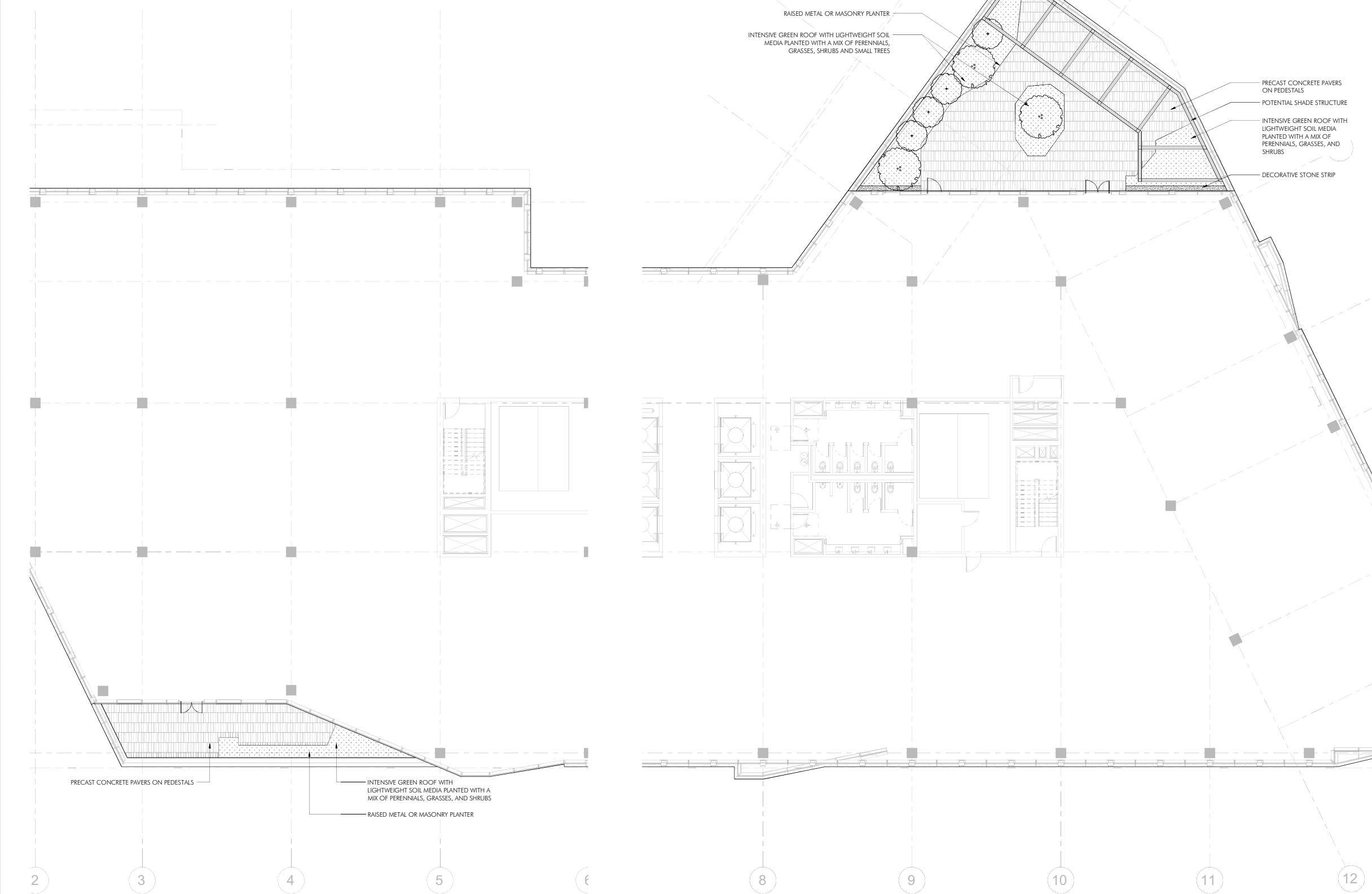
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LANDSCAPE LAYOUT PLAN - LEVEL 09

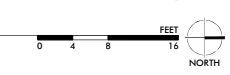
PROJECT: 2530
DATE: May 2026
SCALE: As Noted

SHEET NUMBER:
VDR L104

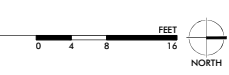
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01 LANDSCAPE LAYOUT PLAN - LEVEL 09 SOUTH TERRACE
1/8"=1'-0"



02 LANDSCAPE LAYOUT PLAN - LEVEL 09 NORTH TERRACE
1/8"=1'-0"



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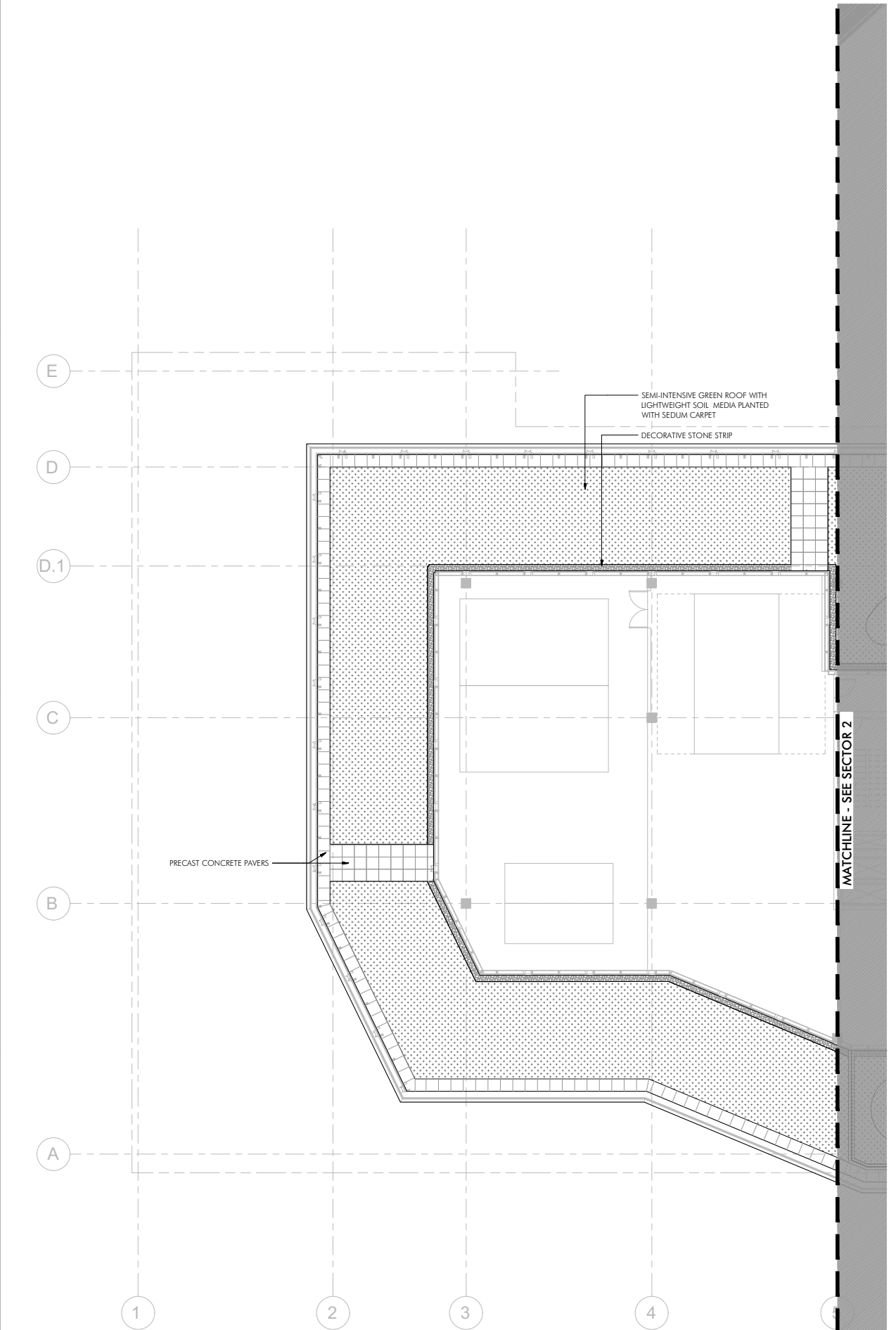
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LANDSCAPE LAYOUT PLAN - PH

PROJECT: 2530
DATE: May 2026
SCALE: As Noted

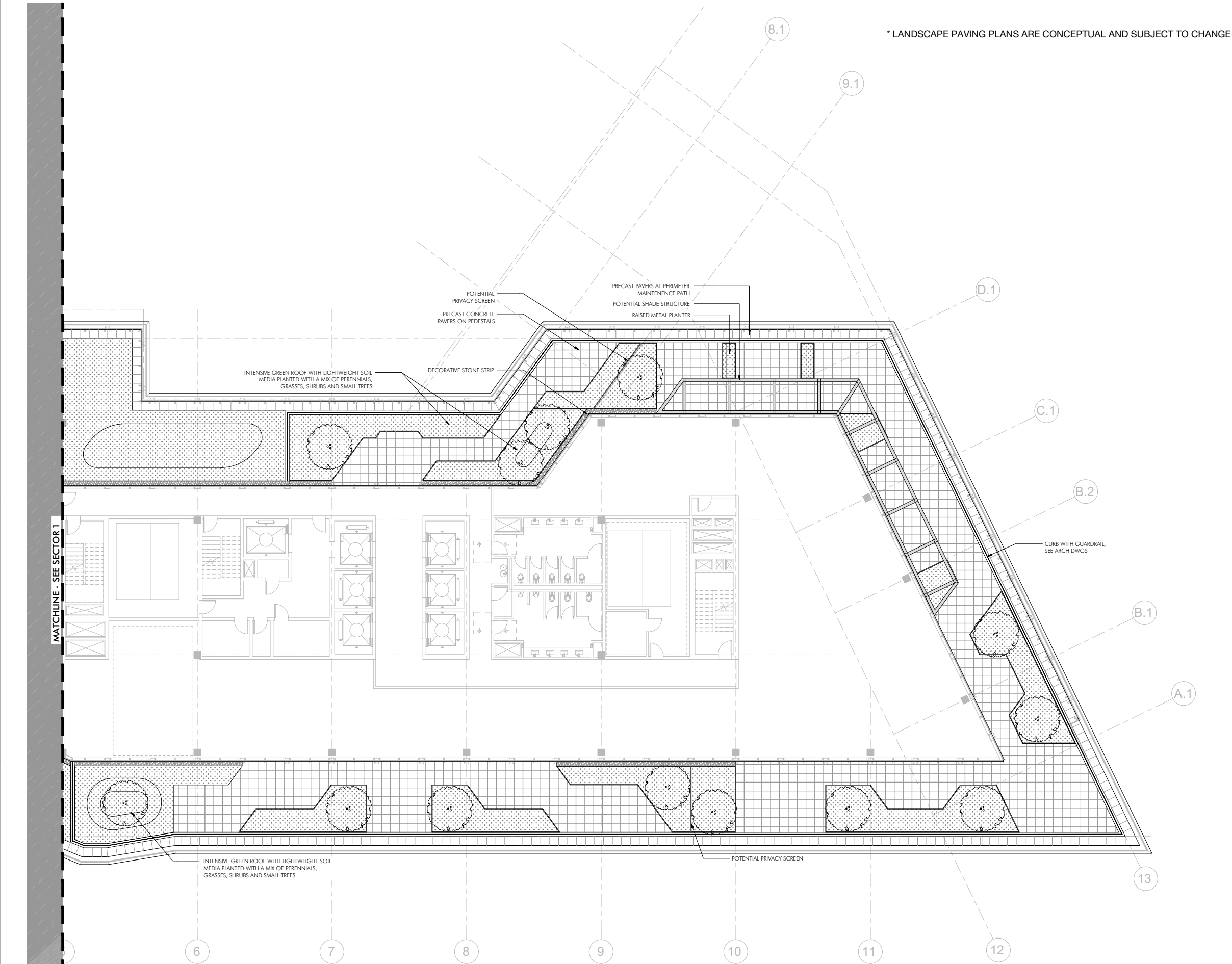
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01 LANDSCAPE LAYOUT PLAN - PH
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01 LANDSCAPE LAYOUT PLAN - PH
1/8"=1'-0"



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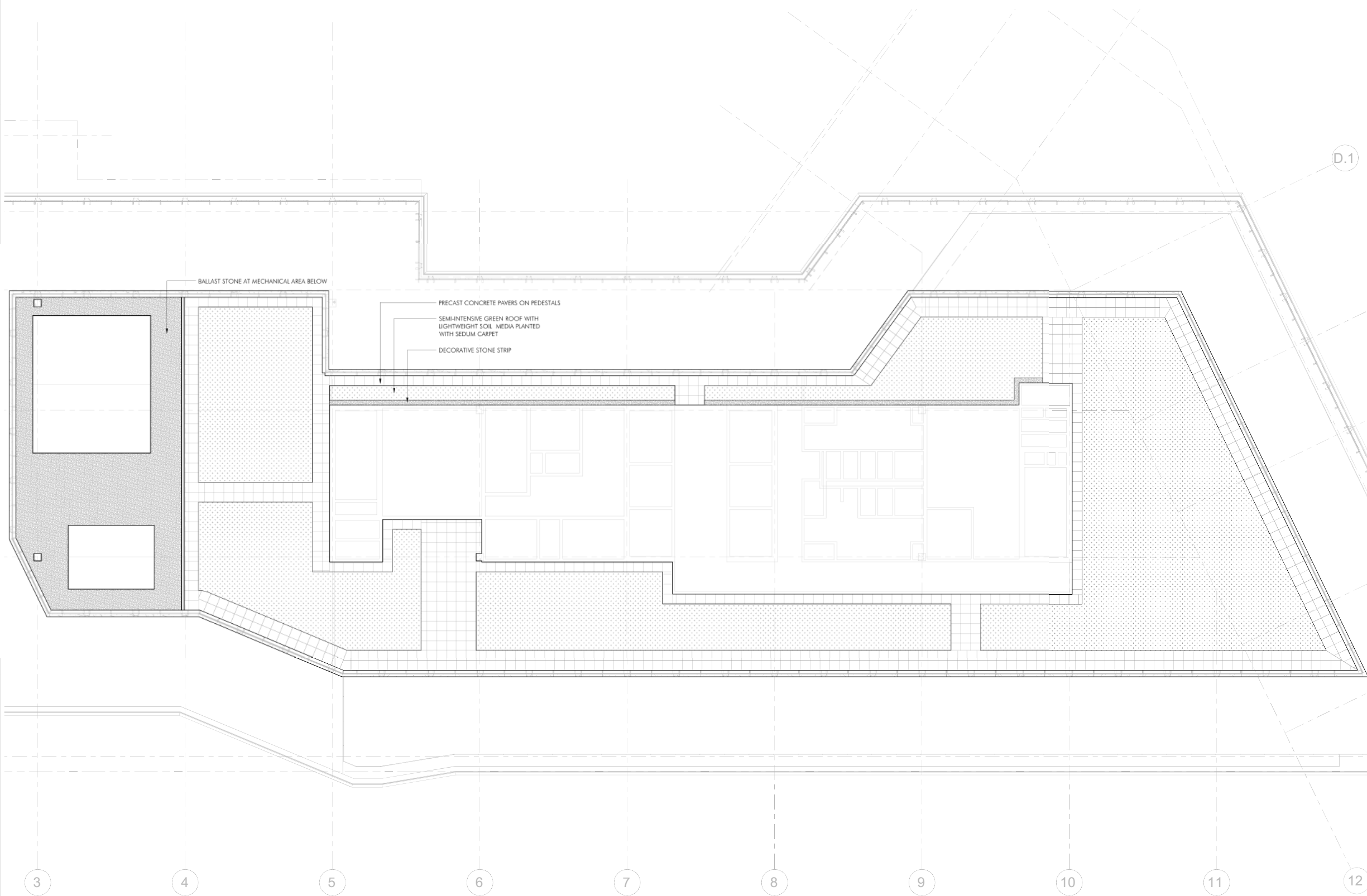
LANDSCAPE LAYOUT PLAN - ROOF

PROJECT: 2530
DATE: May 2026
SCALE: As Noted

SHEET NUMBER:
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D.1



01 LANDSCAPE LAYOUT PLAN - ROOF
1/8"=1'-0"



EXHIBIT F

DISTRICT OF COLUMBIA GOVERNMENT
OFFICE OF THE SURVEYOR

Washington, D.C., April 8, 2026

Plat for Building Permit of: SQUARE 72 Lot 75

Scale: 1 inch = 40 feet

Recorded in Book 153 Page 48

Receipt No. 26-02537 Drawn by: B.S.

Furnished to: DIANA HERNDON

"I hereby certify that the dimensions and configuration of the lot(s) hereon depicted are consistent with the records of the Office of the Surveyor unless otherwise noted, but may not reflect actual field measurements. The dimensions and configuration of A&T lots are provided by the Office of Tax and Revenue and may not necessarily agree with the deed description(s)."

Vincent Costanzi
for Surveyor, D.C.

I hereby certify that on this plat on which the Office of the Surveyor has drawn the dimensions of this lot, I have accurately and completely depicted and labeled the following:

- 1) all existing buildings and improvements - including parking spaces, covered porches, decks and retaining walls over four feet above grade, and any existing face-on-line or party wall labeled as such, well as projections and improvements in public space - with complete and accurate dimensions;
- 2) all proposed demolition or raze of existing buildings duly labeled as such; all proposed buildings and improvements - including parking spaces, covered porches, decks and retaining walls over four feet above grade, any existing face-on-line or party wall labeled as such, as well as projections and improvements in public space and the improvements used to satisfy pervious surface or green area ratio requirements - with complete and accurate dimensions, in conformity with the plans submitted with building permit application _____; and
- 3) any existing chimney or vent on an adjacent property that is located within 10 feet of this lot.

I also hereby certify that:

- 1) my depiction on this plat, as detailed above, is accurate and complete as of the date of my signature hereon;
- 2) there is no elevation change exceeding ten feet measured between lot lines; or if so, this elevation change is depicted on a site plan submitted with the plans for this permit application;
- 3) I have/~~have not~~ (*circle one*) filed a subdivision application with the Office of the Surveyor;
- 4) I have/~~have not~~ (*circle one*) filed a subdivision application with the Office of Tax & Revenue; and
- 5) if there are changes to the lot and its boundaries as shown on this plat, or to the proposed construction and plans as shown on this plat, that I shall obtain an updated plat from the Office of the Surveyor on which I will depict all existing and proposed construction and which I will then submit to the Office of the Zoning Administrator for review and approval prior to permit issuance.

The Office of the Zoning Administrator will only accept a Building Plat issued by the Office of the Surveyor within the two years prior to the date DCRA accepts a Building Permit Application as complete. I acknowledge that any inaccuracy or errors in my depiction on this plat will subject any permit or certificate of occupancy issued in reliance on this plat to enforcement, including revocation under Sections 105.6(1) and 110.5.2 of the Building Code (Title 12A of the DCMR) as well as prosecution and penalties under Section 404 of D.C. Law 4-164 (D.C. Official Code §22-2405).

Signature: _____ Date: _____

Printed Name: _____ Relationship to Lot Owner: _____

If a registered design professional, provide license number _____ and include stamp below.

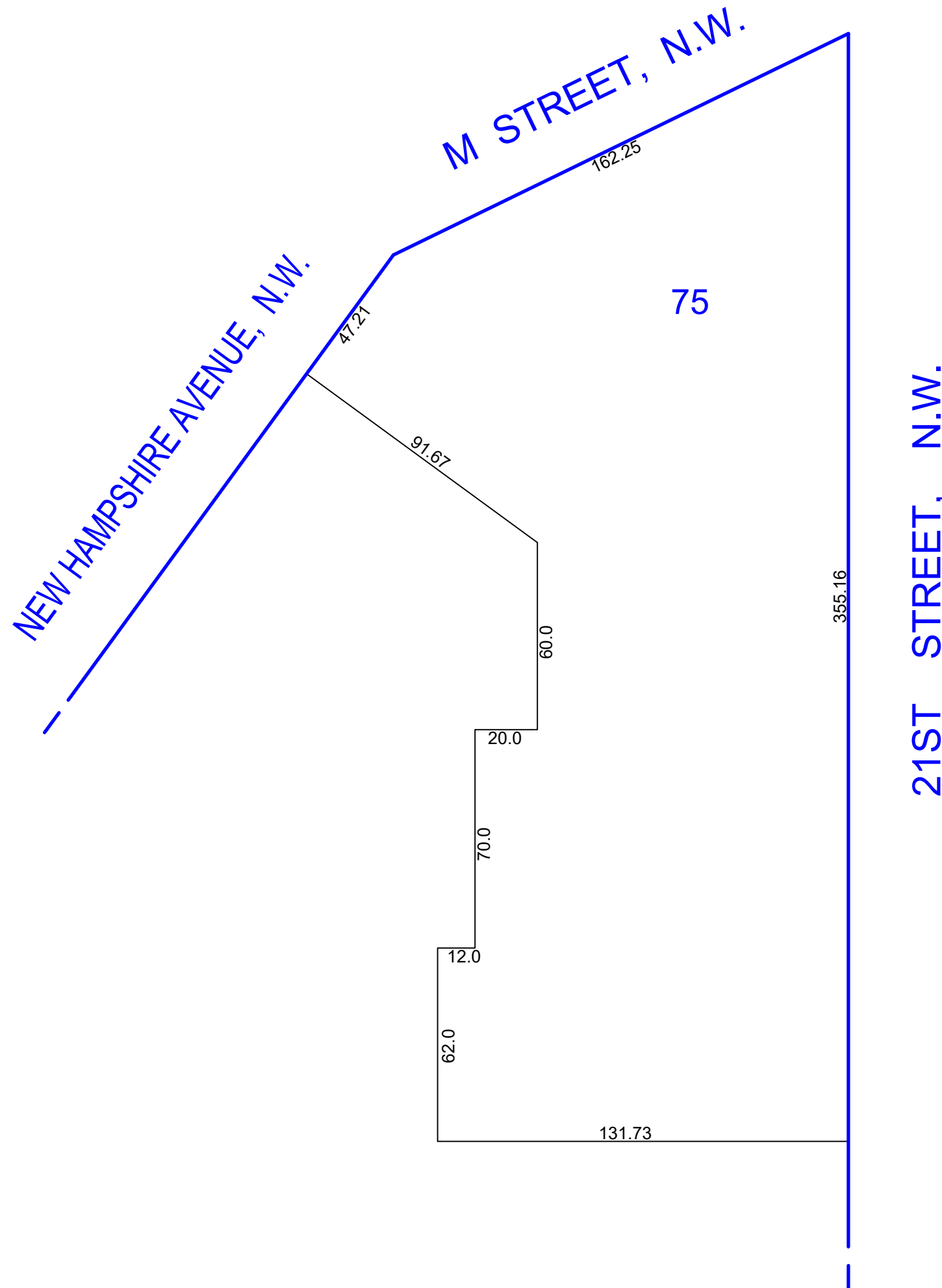


EXHIBIT G

2100 M Street, NW
Voluntary Design Review Application

Comprehensive Plan Evaluation

I. Introduction

As set forth below, the Project is not inconsistent with the Comprehensive Plan (“Comp Plan”).¹ The Comp Plan guides the District’s development, both broadly and in detail, through maps and policies that address the physical development of the District. 10A DCMR § 103.2. The Comp Plan also addresses social and economic issues that affect and are linked to the physical development of the city and the well-being of its citizens. The Comp Plan provides the “big picture” of how change will be managed in the years ahead and, thus, is intended to be interpreted broadly. 10A DCMR § 103.5.

Pursuant to Subtitle X § 604.5, as part of its review the Commission must find that the Project is “not inconsistent” with the Comprehensive Plan (“Comp Plan”). The Commission’s consideration of relevant Comp Plan policies must include consideration of racial equity, in compliance with the Commission’s current Racial Equity Tool. *See* Subtitle Z § 301.10(m). The Commission may need to consider and balance policy consistencies with potential policy inconsistencies and make an overall determination as to whether the Project is not inconsistent with the Comp Plan when read as a whole.

As detailed below, the Applicant has conducted a thorough evaluation of the Project’s consistency, including related requests for zoning flexibility, for consistency with the GPM, FLUM, and applicable Comp Plan policies. **Overall, the Applicant finds the Project to be not inconsistent with the Comp Plan when read as a whole, and specifically will advance numerous Comp Plan policies within the Central Washington; Land Use; Economic Development; Environmental Protection; and Urban Design Elements.**

The following sections of this statement reflect the Applicant’s thorough evaluation of the Project’s overall consistency with the Comp Plan, including when viewed through a racial equity lens. Given the wide range of overlapping policy topics addressed in the Comp Plan, certain Citywide Elements have little to no applicability to the Project. Notwithstanding, in conducting its Comp Plan evaluation the Applicant has thoroughly reviewed the goals and policies of every Comp Plan element. For those Citywide Elements that are directly applicable to the Project, a brief narrative is provided explaining the basis for the Applicant’s determination that the Project is not inconsistent with that particular element. Finally, in accordance with guidance provided by the D.C. Court of Appeals (the “Court”), the Applicant’s evaluation also included a specific assessment of whether the Project is inconsistent with any Comp Plan policies. As discussed further below, the Applicant has not identified any categorical inconsistencies between the Project and the Comp Plan. The Applicant did, however, identify one issue related to the Property’s GPM designation that could be viewed by some as being an inconsistency. While the Applicant does not view this as an inconsistency as a result of language contained within the Framework Element’s guidelines for using the FLUM and GPM, to the extent

¹ D.C. Law L23-0217 (Comprehensive Plan Amendment Act of 2017) and D.C. Law 24-0020 (Comprehensive Plan Amendment Act of 2020), including the Generalized Policy Map (“GPM”) and Future Land Use Map (“FLUM”) (D.C. Resolution R24-0292).

the Commission believes this to be an inconsistency, the Applicant submits that this inconsistency is far outweighed by the Project consistency with the FLUM and numerous Comp Plan policies.

II. Racial Equity and the Comp Plan

As part of its Comp Plan evaluation, the Commission must consider the Project through a racial equity lens. 10-A DCMR § 2501.8. Equity is a primary focus of the Comp Plan, especially in the context of creating/increasing access to opportunity. The Framework Element states that equity is both an outcome and a process, and exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. 10-A DCMR § 213.6. The Comp Plan emphasizes that considerations of equity, and particularly racial equity, must be part of a District agency’s evaluation and implementation of Comp Plan policies and actions. The Commission does this by requiring Applicant’s to utilize the Commission’s Racial Equity Tool to organize and inform their Comp Plan evaluation.

i. Evaluation of Comp Plan Policy Guidance

Per Part I (Racial Equity Analysis Submissions – Guidance Regarding the Comprehensive Plan) of the Commission’s Racial Equity Tool, the Applicant conducted a thorough evaluation of the Project’s consistency with the Comp Plan. **Overall, the Applicant finds the Application to be not inconsistent with the Comp Plan. Regarding racial equity, the Applicant finds that the Project has potential to have positive or neutral impacts / outcomes on racial equity, with the potential for positive outcomes in physical improvements to surrounding public space, increased access to economic opportunity through short- and permanent job creation.**

In accordance with guidance provided by the D.C. Court of Appeals, the Applicant was careful to identify any instances where the proposal may be viewed as being inconsistent with certain Comp Plan policies. **Upon review, the Applicant did not identify any potential inconsistencies between the proposed mixed-use (office and retail) building and relevant Comp Plan policies that would warrant a balancing against Comp Plan consistencies.**

Generalized Policy Map

As shown in **Figure 1**, the Property is designated as “Institutional” on the GPM. According to the Framework Element, the stated purpose of the GPM is to “categorize how different parts of the District may change . . . It highlights areas where more detailed policies are necessary, both within the [Comp Plan] and in follow-up plans, to manage this change.” 10-A DCMR § 225.1. The GPM should be used to guide land-use decision-making in conjunction with the Comp Plan text, the FLUM, and other Comp Plan maps. “Boundaries on the map are to be interpreted in concert with these other sources, as well as the context of each location.” 10-A DCMR § 225.2.

The GPM has four (4) main designations: Neighborhood Conservation Areas, Neighborhood Enhancement Areas, Land Use Change Area, and Commercial/Mixed Use Areas. It then includes “Other Areas,” which include parks and open space, land owned by or under the jurisdiction of the District or federal government, federal lands with federal buildings, Downtown Washington, and major institutional land uses. Regarding these areas, the Framework Element states, “[t]he fact that these areas are not designated as Conservation, Enhancement, or Land Use

Change Areas does not mean they are exempt from the [Comp Plan] or that their land uses will remain static.” 10-A DCMR § 225.22 (emphasis added).

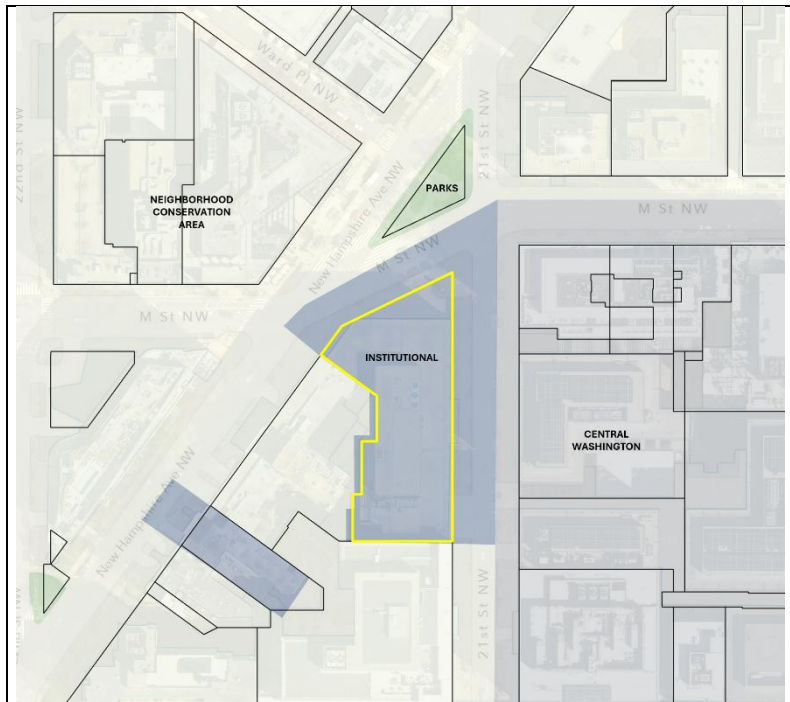
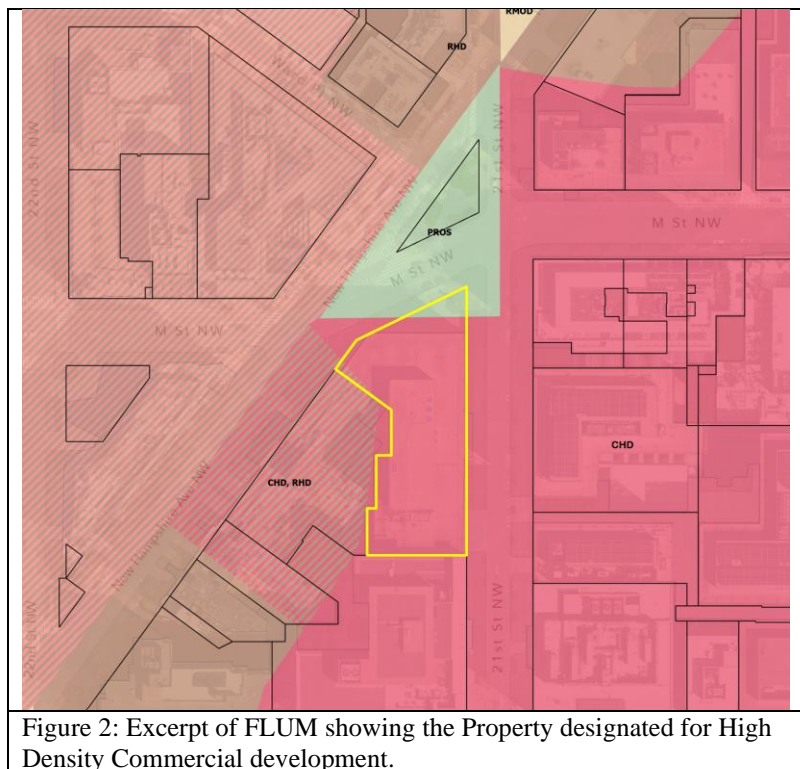


Figure 1: Excerpt of GPM showing the Property designated as Institutional.

The Applicant is not aware of the reason the Property is designated as “Institutional” on the GPM, which appears to date back to when the current form of the GPM was adopted in 2006. To the Applicant’s knowledge, the Property has never been part of a college, university, or other major institutional campus, and the existing building has been used as a typical commercial office building since its construction in 1969. It is possible that the Property’s institutional designation is a reflection of the existing building being anchored by the Urban Institute, a prominent D.C.-based nonprofit research organization and think tank founded in 1968, for 50 years until it relocated in 2019.

Notwithstanding, despite the Property’s GPM designation, the Applicant does not believe the Project is inconsistent with the GPM. As expressly acknowledged by the Framework Element, just because the Property is designated as institutional in the GPM does not mean its land use will remain static. Thus, the Comp Plan itself recognizes that the use of an area designated as Institutional on the GPM could change to something other than institutional. Further, the GPM is intended to be read in together with the FLUM which, as discussed below, depicts the Property within an area designated for high density commercial development. Based on this interpretative guidance provided by the GPM and Framework Element, the Applicant finds the Project to be not inconsistent with the GPM. However, to the extent the Commission considers there to be an inconsistency, the Applicant submits that any such inconsistency is far outweighed by the Project’s consistency with the FLUM and numerous Comp Plan policies related to land use, economic development, and urban design.

Future Land Use Map (“FLUM”)



As shown in **Figure 2**, the Property is located within an area on the FLUM that is designated for High Density Commercial development.² The Framework Element describes the High Density Commercial land use designation as defining the central employment district, other major office centers, and other commercial areas with the greatest scale and intensity of use in the District. Office and mixed office/retail buildings with densities greater than 6.0 FAR are the predominant use, although high-rise residential and many lower scale buildings (including historic buildings) are interspersed. The Project is not inconsistent with this FLUM land use designation.

Area and Citywide Element Evaluation

Near Northwest / Central Washington Area Element

The Property is located on the boundary of the Near Northwest Planning Area and the Central Washington Planning Area, which runs along 21st Street. While technically located within the Near Northwest Planning Area, the Property and much of the immediate surrounding development more readily align with the policy goals and objectives set forth in the Central Washington Element. In fact, the Applicant did not identify any policies in the Near Northwest Element that apply to the Property or Project, but found several that did apply within the Central Washington Element.

Overall, the Project is not inconsistent with applicable policies within the Central Washington Element. The Project will promote a continued mix of uses and help retain Central Washington as the premier office location and dynamic employment center in the region by

² The extreme northern tip of the Property appears to extend into an area that is designated for parks, recreation, and open space (PROS). This is most certainly due to cartographic error given the large scale of the FLUM. As stated in the Framework Element, the boundaries of the FLUM do not follow parcel lines and are intended to be interpreted broadly. The boundary of the PROS area to the north of the Property should realistically follow the curve of M Street.

replacing an older vintage office building with a new, trophy-class office building that will bring new vitality to a centrally located site and prominent intersection within downtown (CW-1.1.1, CW-1.1.2). The elegance and high quality of the Project’s architectural design reinforces the visual prominence of the Property, and the physical qualities that set Washington, D.C. apart from all other cities. Specifically, the site’s location at the confluence of two important grid streets and one important avenue within the historic L’Enfant Plan directly informed the proposed design of the building (CW-1.1.23). Indeed, not only did this inform the massing and sculpting of the overall building form, but the Project’s material palette also balances the symbolic monumentality of the site’s location within the nation’s capital with a distinct and impressive expression of a local downtown (CW-1.1.11). Finally, the Project will help reenergize downtown’s public spaces and street life through its proposed ground floor design and reconstruction of adjacent public space. The ground floor of the proposed building will be highly transparent and activated with ground floor retail and amenity spaces for building tenants (CW-1.1.12). The Project will further promote active street life through the provision of main lobby entrances on both street frontages, and streetscape improvements that will make adjacent spaces feel more comfortable, attractive and safer. (CW-1.1.16).

Land Use Element

The Project is not inconsistent with applicable policies of the Land Use Element as it would advance the continued reinvestment and vitality of downtown Washington, replacing an existing, older vintage, vacant office building with a high quality, trophy-class office building that strengthens downtown’s role as the primary economic and employment center in the region while also improving the pedestrian environment through active ground-floor uses, multiple entrances, and streetscape enhancements (LU-1.2.1). The Project will deliver a high-value office and mixed-use development within the Central Employment Area (“CEA”) that makes efficient use of transportation facilities and reinforces the District’s urban character (LU-1.2.2, LU-1.2.3). The massing of the proposed building embraces the site’s unique edge conditions and provides context-sensitive transitions through carved upper-level volumes and setbacks responsive to the surrounding context (LU-1.2.6). Overall, the Project’s height, mass, and design are tailored to its commercial setting and surrounding streets, including a carefully articulated façade, enhanced public realm, and a scale intended to be compatible with the existing neighborhood fabric (LU-2.4.6).

Environmental Protection Element

The proposed Project will advance several policies contained within the Environmental Protection Element. The proposal will meet or exceed applicable Green Area Ratio (GAR) requirements and the District’s minimum stormwater retention requirements, reflecting an integrated site and landscape design approach that will help manage runoff, support green infrastructure, and improve the environmental performance of the Property. In addition, to the Project’s roof and landscape design will contain green roof areas, other landscaping, and cool roof materials that will help reduce contributions to the urban heat island effect by incorporating greener and more sustainable building and site elements (E-1.1.2, E-4.2.1).

Economic Development Element

The proposed Project will advance several policies contained within the Economic Development Element. Most notably, the proposal will support the recovery of the downtown office sector, which is one of the District most important core industries, by delivering new, high-quality office space suited to major employers that are essential to the District's economy (ED-1.1.1). The proposal also reinforces the concentration of jobs and business activity within in Central Washington, and will help maintain the District's competitive position in the region through a prominent, transit-accessible, amenity-rich workplace environment with active ground-floor uses, strong pedestrian connections, and an architecturally distinctive design (ED-1.1.2, ED-1.1.6). Finally, the Project will locate new office growth in the downtown core, one of the Comp Plan's preferred areas for office development, through infill redevelopment of an established commercial site rather than displacing that growth elsewhere (ED-2.1.1, ED-2.1.3, ED-2.1.5).

Urban Design Element

The Project is not inconsistent with the policies of the Urban Design Element. Most notably, the design responds directly to the site's unusual triangular geometry, its highly visible location at the intersection of M Street, New Hampshire Avenue, and 21st Street, and its immediate relationship to Duke Ellington Park in a way that reinforces important public views and strengthens the surrounding streetscape. The proposed design expressly recognizes the site as part of a significant moment in the L'Enfant Plan, with the building's prow-like configuration, prominent corner treatment, and orientation toward the park helping to preserve and frame views along adjoining streets and open spaces, while establishing an appropriately distinctive architectural presence at a prominent downtown location (UD-1.1.3). The proposal also will contribute to a more active and engaging pedestrian environment by replacing the current vacant building with high-quality office space sitting atop an animated ground floor with lobby and retail uses, multiple entrances, opportunities for outdoor seating, and varied frontage conditions intended to enliven the sidewalk, improve permeability between the building and the public realm, and create a more welcoming experience along each street frontage (UD-2.1.A, UD-4.2.2, UD-4.2.6). In addition, the building's massing is carefully articulated through carved volumes, upper-level setbacks, and varied roof forms that reduce visual bulk, avoid a monolithic appearance, and create a more gradual and visually appealing transition to surrounding development, while still maintaining a coherent street wall (UD-2.2.4, UD-2.2.5, UD-4.2.1, UD-4.2.5, UD-4.3.3). Finally, the façade composition is designed to complement the surrounding area through high-quality materials, strong vertical articulation, and a clearly expressed base-middle-top organization, while selective projections and enhanced corner treatments add depth and texture to the building, and help create a more comfortable, pedestrian-scaled urban form (UD-4.2.3, UD-4.2.4).

Potential Comp Plan Inconsistencies

The foregoing Comp Plan analysis thoroughly demonstrates the numerous ways in which the Project aligns with the policies and goals of the Comp Plan, including the FLUM and GPM. However, as set forth in decisions by the Court, it is not sufficient to simply identify the policies that would be advanced when evaluating a proposal for consistency with the Comp Plan. Rather, because there is intentional overlap within and between the Comp Plan elements, a Comp Plan evaluation must recognize any potential inconsistencies and explain why said inconsistencies are outweighed by other Comp Plan policies and/or competing considerations. The Implementation Element reflects similar guidance: “[r]ecognize the overlapping nature of the [Comp Plan]

elements as they are interpreted and applied. An element may be tempered by one or more of the other elements.” 10-A DCMR § 2504.6. In conducting its evaluation, the Applicant was careful to identify any instances where the Project may be viewed as being potentially inconsistent with certain Comp Plan policies.

As previously discussed, the Applicant did not identify any categorical inconsistencies between the Project and the Comp Plan. However, the Applicant did note the Property’s “Institutional” GPM designation could be view by some as being at odds with the proposed office building. The Applicant does not view this as an inconsistency due to language in the Framework Element expressly acknowledging that sites designated as Institutional on the GPM may not always be used for institutional purposes. In addition, the Property’s location within the Near Northwest Planning Area could be seen as an inconsistency. As noted above, the Project does not further policies within the Near Northwest Planning Area. However, the Property is situated on the border of the Central Washington Element and the Project furthers numerous policy goals within that area. To the extent the Commission sees either of these as inconsistencies with the Comp Plan, the Applicant submits that the inconsistencies are far outweighed by the Project’s consistency with the FLUM and numerous Comp Plan policies.

1. Racial Equity as a Process

The Framework Element states that racial equity is a process, and that as the District grows and changes, it must do so in a way that builds the capacity of vulnerable, marginalized, and low-income communities to fully and substantively participate in decision-making processes. 10-A DCMR § 213.7. As a process, a racial equity lens is employed when those most impacted by structural racism are meaningfully involved in the creation and implementation of the policies and practices that impact their lives. The Commission’s Racial Equity Tool emphasizes community outreach and engagement, which are expected to begin at the inception of any proposed zoning action. All submissions to the Commission shall be accompanied by a discussion of efforts taken by applicants to engage the community early in the zoning process. The information contained in **Table 2** addresses the questions set forth in **Part II (Community Outreach and Engagement)** of the Racial Equity Tool. As demonstrated below, the Applicant has engaged with the community, and it will continue to do so throughout the design review and development processes.

Table 2: Community Outreach and Engagement
Description of affected community (including defining characteristics).
The most directly affected community is the portion of the Near Northwest Planning Area that surrounds the Property, especially people who live and work within walking distance. Since the Project proposes an office redevelopment, rather than a residential redevelopment, the affected community is likely broader than just immediate abutting neighbors and could include: residents living in the West End, Dupont Circle, and Foggy Bottom neighborhoods; nearby workers and office-serving businesses that rely on daytime foot traffic; commuters and transit users who use M and 21 Streets and adjacent Metrorail/bus service; and nearby property owners and landlords whose properties may be affected by changes in rents, land values, and commercial activity.
Characteristics of the affected community that influenced outreach plan / efforts.
The area of the affected community can be generally described as a high-income, highly educated, renter-heavy urban area with strong office and service economy components. It is considered to be a high-opportunity area with strong transit access, valuable real estate, and significant

employment concentration. The resident population is mixed, although predominately comprise of White residents, with small household sizes, relatively few children, and a sizable senior population. It contains both affluent households and more economically vulnerable subpopulations.

Community outreach timeframe / dates of major meetings and points of engagement

The Applicant introduced the Project to ANC 2A at their regularly scheduled public meeting on April 15, 2026. The Applicant also gave a special community presentation of the Project on April 27, 2026. The Applicant plans to attend the upcoming meeting for ANC 2B’s permitting committee in May.

Members of the affected community that would potentially benefit by the proposed zoning action.

Residents that live nearby will benefit from the new ground floor retail within the Project, as well as the improvements to adjacent public space that will be constructed as part of the Project. Workers and visitors to the area will similarly benefit from the presence of additional ground floor retail uses.

Members of the affected community that would potentially be burdened by the proposed zoning action.

Residents, workers, and visitors may temporarily be burdened by the Project during construction due to noise, dust, and pedestrian and vehicular constraints around the site. No long-term or permanent burdens are anticipated.

Potential positive outcomes of the proposed zoning action identified by the affected community.

At the community meeting held on April 27, 2026, members of the affected community noted the potential benefits of the Project, bringing new office workers and visitors to the area to support existing retail and activate the long-underutilized corner property. The community noted that the law firm tenant, Sidley, would likely attract many visitors that would required lodging in the nearby hotels. The community anticipates that the Project will have positive economic impacts on the District.

Potential negative outcomes of the proposed zoning action identified by the affected community.

The community noted potential impacts to light and air on the nearby Yours Truly hotel to the west of the Property. The Applicant has been in communication with the owners of the hotel.

Changes / modifications made to the proposed zoning action that incorporate / respond to input received from the affected community.

No feedback has been received from the affected community to date that required changes or modifications to the Project.

Input received from the affected community not incorporated into the proposed zoning action.

No feedback has been received from the affected community to date that required changes or modifications to the Project.

Efforts taken to mitigate potential negative outcomes identified by the affected community.

No mitigation efforts have been required to date.

2. Racial Equity as an Outcome

As an outcome, racial equity is achieved when race no longer determines one’s

socioeconomic outcomes, and when everyone has what they need to thrive no matter where they live or their socioeconomic status. 10-A DCMR § 213.9. **Table 3** considers the Project relative to any anticipated positive and negative impacts and/or outcomes to racial equity. Upon consideration, any impacts / outcomes resulting from the Project are likely to be positive or neutral as they relate to racial equity, with the potential for positive outcomes in physical improvements and access to economic opportunity.

Table 3: Evaluation of Zoning Action Through a Racial Equity Lens	
Direct Displacement	The Project will not cause direct residential displacement as the site does not contain any residential use. The Property is currently improved with a vacant/underutilized office building. The existing building will be razed, and the subject property will be redeveloped with the Project.
Indirect Displacement (Economic and Cultural)	<p>The Project will not lead to indirect economic or cultural displacement within the immediate area.</p> <p>Indirect displacement occurs when new uses significantly alter neighborhood dynamics or raise property values and rents, resulting in long-standing residents or businesses having to move out or close down. In this case, the Project is located within the downtown core of the District, and largely surrounded by office, institutional, lodging, and high-end multi-family residential buildings. The area surrounding the Project is fully built out and characterized with some of the highest property values in the city. Based on these factors, the Project is unlikely to trigger the type and amount of growth in the area that has the potential to increase property values and cause indirect displacement of existing residents in the immediate area. Additionally, the Project will not cause cultural displacement as it is not located in an area that is characterized by residents with a long-established neighborhood history that is at risk of being pushed out.</p>
Housing	The Project will not cause any direct changes or have any direct impact on housing.
Physical	The Project will result in positive changes to public space, streetscape, infrastructure, and the environment. As part of the project, the adjacent public space and streetscape will be reconstructed to DDOT standards, including sidewalks, tree boxes, bike racks, and other street furnishings.
Access to Opportunity	The Project is expected to have neutral outcomes related to access to opportunity.
Community	The Project is expected to have neutral outcomes overall as related to the Affected Community. The Property has been used for commercial office purposes since 1970, when the existing building was constructed. The Project will replace the existing, outdated office building with a new, high-quality office building. Given its location in the West End of downtown and on the edge

of the Central Employment Area, the proposed revitalization of the Property for continued office use is appropriate, and not likely to cause displacement of existing residents (owner and renter) due to increased residential property values.

EXHIBIT H

ZONE MAP

