GOVERNMENT OF THE DISTRICT OF COLUMBIA OFFICE OF PLANNING



Office of the Director

MEMORANDUM

TO:

District of Columbia Zoning Commission

FROM:

Ellen McCarthy, Director

SUBJECT:

Final Report, Zoning Commission Case No.03-12C and 03-13C

Capper/Carrollsburg Venture LLC Hope VI Revitalization Project

- 2nd Stage (Phase 2) Planned Unit Development Approval

- Square 769 Lots 18, 20 & 21 – 250 M Street, SE

DATE:

November 27, 2006 (original was signed, and stamped in at 4:50 p.m. on 11-27-06)

I. APPLICATION AND OFFICE OF PLANNING RECOMMENDATION

The Office of Planning recommends the Zoning Commission (the Commission) approve this application.

The applicant -- Capper/Carrollsburg Venture, LLC in conjunction with the District of Columbia Housing Authority (DCHA) -- is seeking Commission approval of a Second Stage PUD and associated relief from the roof structure requirements of 11DCMR § 770.6, to permit construction of a 200,780 square foot, nine-story, 110' tall office building with ground floor retail uses, in the southern portion of Square 769. The Square is bounded by L, M, 2nd and 3rd Streets, SE. The site is zoned CG/C-3-C.

OP incorporates by reference its May 7, 2003 and July 14, 2003 reports to the Zoning Commission on Case No. 03-12/03-13.

II. PROJECT APPLICATION SUMMARY

A. Overall PUD

In Order No. 03-12/03-13 the Zoning Commission gave preliminary approval to a mixed use PUD and HOPE VI project for 15 Squares in southeast Washington, DC, as well as approval to a Consolidated PUD on 6 Squares within the Preliminary PUD. These Squares are listed in Table 1 and illustrated in Attachment 3. Since then, the Commission has also taken Final Action for a second-stage PUD for portions of Square 799, Square 800 and Square 800W.

The overall project includes the demolition of all but one of the existing Capper/Carrollsburg buildings, the retention of one elderly housing building, and the construction of approximately 1,700 new housing units, 702,000 square feet of office space of which up to 236,000 was permitted on the Square 739, and approximately 51,000 square feet of retail space. The residential construction includes 1 for 1

CASE NO. UCASE NO. 25

EXHIBIT NO. 25

ZONING COMMISSION

replacement of public housing units with new public units and approximately 800 moderate and market rate units.

The project is financed, in part, with a \$35 million federal grant under the U.S. Department of Housing and Urban Development's (HUD's) HOPE VI program.

SQUARE	PRELIMINARY	CONSOLIDATED		IN THIS APPLICATION?
739	X			
767	X			
768	X			
769	X			Y
797		X	X	·
798		X	X	
799, east	X		X	
2/3				
800,	X		X	
northern				
824		X	X	
825		X	X	
825S w/out		X		
SE corner				
880	X		X	
881,west	X		X	
853 N,west	X			
882	X			

Table 1: Squares Within Capper/Carrollsburg Hope VI PUD (cf. Attachment 1)

B. Current Stage II PUD Application

1. Site Location

The 27,960 square foot site is in the southern half of the block bounded by 2nd, 3rd, L and M Streets, S.E. The land is currently used as a parking lot. The northern half of the square is vacant and is intended to be developed for high-rise residences in a later Second Stage PUD. The northern and southern halves of the Square would be separated by an east-west private service drive that would be constructed as part of the current application.

There are new office buildings with approximately 2 million square feet within two blocks to the south, east and west of the project. Most notable are the U.S. Department of Transportation headquarters building immediately south side of M Street, and the private Federal Gateway Building to the west on M Street, across the planned Canal Blocks Park from the proposed project. The new baseball stadium is under construction approximately 3 blocks to the southwest. The rest of the Capper/Carrollsburg is in various stages of development, primarily to the north and east. The Navy Yard Green Line Metrorail Station is two blocks to the west.

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2. Zoning

The site is within the C-3-C District (medium – high density development including office, retail, housing and mixed use developments). Office and retail uses are permitted within this zone. The site is also within the Capitol Gateway Overlay District, as is discussed in Section IV of this report.

3. Proposed Development

The 110 foot high building will be a 9 story building with 189,932.47 sf devoted to office use and 10,947.95 devoted to retail space. The latter comprises 52% of the first floor. The four levels of underground parking will accommodate 194 fully accessible and 238 total parking spaces. These would be entered from a 25-foot wide private service road that would be built between this development and the future residential development on the northern half of Square 739.

The building's design takes its "cues" from the Federal Gateway Building to the west, which was designed by the same architecture firm, with respect to materials, massing, fenestration and embellishments. The intent is that the two buildings act as sympathetic bookends for the planned Canal Blocks Park. The building facade reads as a curtain wall that is partially on angle and pushing through a pre-cast masonry building that lines up with the city grid. There is tower element with a cantilevered canopy at the principal office entry on M Street. Retail entries are within the glass portions of what reads as a two story base. Above the level of the pre-cast façade set flush with 2nd Street, the eight and ninth floors of the 2nd Street curtain wall angles inward from M Street to the northern end of the building. This angle is repeated on the corner of the ground floor at M and 2nd Street. The northern façade, which would face a future residential building, is fully designed with pre-cast concrete and punched window framed in aluminum.

The building has a fully designed, "signature" mechanical penthouse enclosure. It has a six-foot sunscreen running the length of the penthouse enclosure on the 2nd Street side; a 4'10" upward slope from 2nd to 3rd Street along M Street; and an approximately 10-foot cant from bottom to top, on 2nd Street. The penthouse size has been reduced since Setdown; its eastern wall, which had been flush with the building face, is now pulled-back 24'8". The design has also been refined so that the cornice band on the penthouse, which is within the required setback line, is thinner that previously shown. The building would also have several "extensive" green roof elements.

The proposed streetscape is primarily DC standard lamp black concrete paving with patterned stone inlays cobble stone edges at the curb line and inlaid paving adjacent to the building on 2nd Street and at the building entrance. On M Street there are four tree boxes, and stone and concrete elements within the sidewalk perpendicular to M Street, approximately 30 feet apart. On 2nd Street there are three tree boxes, one of which contains an existing tree, three raised planters, and one ground level planter bed. On 3rd Street, two existing trees are being retained and there is a more extensive planting bed, since there is no retail facing this street.

Table 2: 250 M Street Office and Retail Stage 2 PUD Development Summary

Table 2. 230 Wi Street	t Office and Retail Stage 2 PUD Development Summary RELIEF			
	PERMITTED OR REQUIRED	PROVIDED	REQUIRED	
SITE AREA		27,960.9 sf		
OFFICE GROSS SF.		189,932.47 sf	None	
RETAIL GROSS SF.		10,947.95 sf	None	
	236,000 permitted by PUD Order	Actual is 200,780.42,	None	
TOTAL GROSS SF				
TOTAL OFFICE	1 per 1,800 office gsf over 2,000	Not specified	None	
PARKING	gsf = 110 required by zoning			
TOTAL RETAIL PARKING	1 per 750 retail gsf over 3,000 gsf = 11 required	Not specified	None, provided retail spaces are designated	
	150 required by PUD Order	194 fully accessible, 237	None	
	104 office,14 retail (and 5 bicycle)	total		
TOTAL PARKING	spaces required by zoning - 118	22 bicycle		
% LOT		82.5% provided	None	
OCCUPANCY	100 % permitted by zoning			
FAR	8.0 permitted by PUD	7.18 provided	None	
•		20' provided from M	None	
SIDE YARD	18'4" required by zoning	Street	· · · · · · · · · · · · · · · · · · ·	
REAR YARD	23'4 5/8" required,	30'4 ½ " provided from 2 nd St. centerline	None	
	Permits equal horizontal height of up to 18'6", with vertical walls	Horizontal elevation angles up 4'10" from	Relief from § 770.6 (cf. § 411.5)	
ROOF STRUCTURE	Cannot occupy more than 0.37 FAR	east to west up to maximum of 18'6"; walls not vertical on two sides; is 0.23 FAR		
	Must be set back from parapet a distance at least equal to its height			
CG M Street Setback	distance at least equal to its height	15' to 17'	None	
under §1604.3	15' from M Street property line	15 10 17	none	
CG Ground Floor	35% devoted to retail,	52%	None	
uses under §1604.4	entertainments or arts			
CG Streetwall		Over 50%	None	
requirements under	50% of street wall devoted to			
§1604.6	display windows		444.49	
Driveways restrictions		No Driveways on M	None	
on M Street under		Street		
§1604.7	Driveways restricted			

4. Zoning Flexibility Requested Under PUD Guidelines

The applicant is seeking relief from 11DCMR § 770.6's requirements that a roof structure must meet § 411.5's requirements for the enclosing walls to be of equal height from the roof level and to rise vertically to the roof. The applicant seeks to slope the walls 4'10" upwards from west to east on M

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Street, and to slope both the M Street and 3rd Street sides inwards, to be terminated by horizontal projections covering a portion of the south-facing and west-facing roof terraces.

5. Flexibility from Findings of Fact and Conditions Applicable to Preliminary PUD and Consolidated PUD

The applicant is not requesting any deviation from the conditions set down by the Commission for the Preliminary PUD.

III. PUD EVALUATION

A. MAJOR APPLICABLE PRELIMINARY PUD CONDITIONS

- 4. The second stage applications shall conform to the Commission-approved Preliminary Plans. It conforms. The Preliminary PUD Plans had shown an approximately 236,000 gsf office building with first floor retail.
- 5. The [overall] PUD shall include no more than 702,000 gsf of office space and 51,000 gsf of retail space. It conforms. This is the first office and retail space to be constructed within the PUD.
- 6. The overall maximum office and retail density shall be no more than 0.80 FAR. It conforms. Although this building would have a 7.18 FAR on its individual site, as the first office or retain project within the PUD, it would be well within the overall 0.80 limitation.
- 7. (a) The office buildings in Square 769 shall be no higher than 110 feet. ItConforms. The building would be 110 feet tall.
- 8. (i) Roof structures may not exceed 18' 6". It conforms. Note: August 4, 2006's Sheets A2.01 and A2.03 erroneously showed the eastern portion of the penthouse exceeding the maximum limit. The height is correctly shown on Sheet A2.02. The applicant will be submitting corrected drawings for the other sheets.
- 10. The building design must comply with the Preliminary PUD's Urban Design Guidelines. It conforms. Square 769's design guidelines require at least 80% of building faces to be built to Build-to lines which, on M Street are established by 300 M Street (as well as the CG Overlay); that the height not exceed 110 feet, that the 2nd and M corner recognize its role as a gateway to Canal Park; that the primary office entry be from M Street and there be retail entrances on both 2nd and M Street; that there be a service alley on the north side of the building; that there be tri-partite organization of the façade, with both the base and the top areas being two-stories high and being defined with a horizontal "expression line"; that the retail space should be at least 60% glazing with no reflective or tinted glass permitted; that the sill heights on the 1st floor be no more than 3 feet above grade; that the amount of glazed surface above the retail floor not exceed 70%. The design meets all of these guidelines

- 11. The office building is required to provide 150 vehicular spaces. It conforms, and provides 194 conforming vehicle spaces. It also provides 22 bicycle spaces.
- 12. Landscaping Plans shall conform to the Preliminary PUD's plans. It conforms.
- 15. Provide 14' clear first floor retail height. It conforms
- 17. Contribute \$36,000 to Canal Block Parks Development Association before Issuance of Building Permit. This is not yet applicable. The applicant has agreed to make this contribution when required.
- 22. Commit to Achieving at least 35 % LSDBE. The applicant has provided a draft LSDBE Memorandum of Understanding with the District Department of Small and Local Business Development. As of August 4, 2006, it had been signed by the applicant but not by the Director of the Department of Small and Local Business Development. A fully signed agreement should be provided prior to final action.
- 23. Provide a 51% First Source Employment Agreement with DOES. It conforms. This was submitted to the Commission in Exhibit 5 of the applicant's November 17, 2006 filing with the Commission.

The applicant provided additional discussion of compliance with Order No. 03-12/03-13 in Exhibit C of the April 21, 2006 filing.

B. RELATIONSHIP OF THE APPLICATION TO THE COMPREHENSIVE PLAN

The Generalized Land Use Map designates the site as "medium – high density commercial" (shopping and service offering a concentration and variety of goods and services). The site is within a Metrorail Development Area, and within the Central Employment Area. The proposed development would further the objectives of these designations through:

- The provision of new office and retail development adjacent to a Metro station, and on M Street SE which is becoming a major commercial corridor, and on 2nd Street SE, which is facing the future Canal Blocks Park, and;
- The provision of office space in proximity to other existing and emerging office areas, including the Southeast Federal Center / US Department of Transportation site, the Washington Navy Yard, and the South Capitol Street / Baseball District.

The proposal would particularly further the following major themes of the Comprehensive Plan, as outlined and detailed in Chapter 1 - General Provisions Element:

- (a) Stabilizing and improving the District's neighborhoods
- (b) Increasing the quantity and quality of employment opportunities in the District
- (e) Respecting and improving the physical character of the District

- (h) Reaffirming and strengthening the District's role as the economic hub of the National Capital Region
- (i) Promoting enhanced public safety

The proposed new development would further or be not contrary to a number of specific Comprehensive Plan objectives, including ones within the Chapter 5 Transportation and Chapter 11 Land Use Elements respecting development close to Metro Stations:

- § 502.2 The policies established in support of the general transportation objectives (include):
 - (a) Support land use arrangements that simplify and economize transportation services, including mixed-use zones that permit the co-development of residential and nonresidential uses to promote higher density residential development at strategic locations, particularly near appropriate Metrorail stations;"
- § 1100.8 Development in Metrorail station areas will be undertaken to assure orderly growth, compatible mixes of uses, appropriate densities, good pedestrian and vehicular circulation, and appropriate combinations of public and private action."

III. ZONING COMMISSION CG OVERLAY REVIEW

The site is within the Capitol Gateway Overlay District, and is, therefore, subject to the requirements of the Zoning Regulations Chapter 16, including (among other things):

- mandatory Zoning Commission review for development facing M Street (§1604.1);
- a 15' setback along M Street SE (§1604.3);
- 35% of the ground floor to be devoted to retail, entertainment, or arts use (§1604.4);
- 50% of the street wall to be devoted to display windows (§1604.6); and
- driveway restrictions from M Street (§1604.7).

The Office of Planning has reviewed the application within the Overlay context as well as within its PUD context. By the objectives of § 1604.2 "the proposed building's architectural design, site plan, landscaping, and sidewalk treatment are of a superior quality, pursuant to the design and use requirements set forth in §§ 1604.3 through 1604.7."

A. CG OVERLAY CONSIDERATIONS NOT REQUIRING RELIEF

Section 1604.3 The streetwall of each new building shall be set back for its entire height and frontage along M Street not less than fifteen (15) feet measured from the face of the adjacent curb along M Street, S.E.

The streetwall design conforms, but concerns remain. The proposed building provides the required 15 foot setback as measured from the M Street curb. The design and the landscaping for the M Street sidewalk will help to create a comfortable pedestrian experience. At Setdown OP had expressed concerned about two issues:

1. Coordination of the streetscape design with the Anacostia Waterfront Corporation (AWC) and with the District Department of Transportation (DDOT) prior to a public hearing.

The applicant has since met with DDOT but had not been able to meet with AWC at the time this report was filed. The design has been brought into conformance with DDOT standards, by eliminating the decorative stone lines from the public portion of the pavement on 2nd and from all of 3rd Street and M Street. The current proposal for the pavement pattern is shown on Sheet L-100 of the applicant's November 17 submission to the Commission.

In OP's opinion, the applicant moved in the appropriate direction by eliminating the August filing's decorative paving that was based on the location of the building's structure; however, OP believes the pavement shown in the November 17 filing is too plain. OP has asked the applicant to submit an alternative design that reflects M Street's importance as the major pedestrian street in Near Southeast, and that is coordinated with AWC as well as with DDOT.

2. Provision of an alternative design for the 1st floor facing 2nd Street that did not pull the ground floor back on an angle.

The applicant has revised the design to bring this face flush with the property line.

Section 1604.4: Each new building shall devote not less than thirty-five percent (35%) of the gross floor area of the ground floor to retail, service, entertainment, or arts uses ("preferred uses") as permitted in §§ 701.1 through 701.5 and §§ 721.1 through 721.6 of this Title; provided, that the following uses shall not be permitted: automobile, laundry, drive-through accessory to any use, gasoline service stations, and office uses (other than those accessory to the administration, maintenance, or leasing of the building). Such preferred uses shall occupy 100% of the building's street frontage along M Street, except for space devoted to building entrances or required to be devoted to fire control.

Conforming. The proposal would devote approximately 52% of the ground floor to retail use. With the exception of the entry lobby, the entire M Street frontage is designed for retail use. In addition, the retail use wraps around the corner and also lines the Second Street façade. The retail space clear height will be 14', in conformance with PUD Condition No 15, thus making it acceptable to most potential retail tenants. The applicant has now committed to permitting no forms of retail prohibited by the CG Overlay.

Section 1604.5: For good cause shown, the Commission may authorize interim occupancy of the preferred use space required by § 1604.4 by non-preferred uses for up to a five (5) year period; provided, that the ground floor space is suitably designed for future occupancy by the preferred uses.

<u>Not applicable</u>. The applicant is not requesting interim occupancy of preferred use space by any other form of use.

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Section 1604.6: Not less than fifty percent (50%) of the surface area of the street wall of any new building along M Street shall be devoted to display windows having clear or low-emissivity glass except for decorative accent, and to entrances to commercial uses or the building.

<u>Conforming</u>, Virtually all of the M Street and 2nd Street façades at the retail level will be devoted to display window having low emissivity glass. At Setdown, OP recommended that the applicant provide confirmation that the glass will conform with the definition of clear and/or low emissivity glass recently adopted by the Zoning Commission, and the amount of street wall devoted to display space. The applicant provided this confirmation on page 6 of its August 4, 2006 submission.

Section 1604.7: No driveway may be constructed or used from M Street to required parking spaces or loading berths in or adjacent to a new building.

<u>Conforming</u>. The applicant is not proposing a driveway to parking or loading from M Street. Underground parking and all loading would be accessed from a new 25-foot wide private drive on the north side of the proposed building.

The proposal also addresses a number of specific purpose statements for the CG Overlay, as noted in §1600.2:

- (a) Assure development of the area with a mixture of residential and commercial uses, and a suitable height, bulk and design of buildings, as generally required by the Comprehensive Plan and planning studies of the area;
- (b) Encourage a variety of support and visitor-related uses, such as retail, service, entertainment, cultural and hotel or inn uses;
- (e) Require suitable ground-level retail and service uses and adequate sidewalk width along M Street S.E., near the Navy Yard Metro Station

The proposed office/retail use conforms to zoning and Comprehensive Plan objectives for the area and to the Conditions of PUD Order No. 03-12/03-13. The proposed height and density are within the permitted amounts. The proposed uses will further the CG Overlay and Anacostia Waterfront Initiative objectives for M Street.

The provision of active retail space along M Street within 2 blocks of the Metro station benefits overall objectives for the area. The proposal also provides for the required M Street setback.

Overall Building Design Concerns

Section 1604.2 envisions that "the proposed building's architectural design, site plan, landscaping, and sidewalk treatment are of a superior quality, pursuant to the design and use requirements set forth in §§ 1604.3 through 1604.7."

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The PUD regulations encourage superior design. The applicant wishes to have the project's architecture reflect elements of the Federal Gateway Building in order to create a gateway frame for the southern end of the Canal Blocks Park. The applicant's massing and choice of materials appear to create that effect. At Setdown, the Commission and OP asked the applicant to further refine the design – especially the treatment of the southern, western and eastern facades in order to emphasize the contrast between the sheer curtain walls and the more textured, shadow-casting pre-cast façades.

The applicant has since revised the façade plans to make the pre-case section more robust by adding score lines and wills underneath windows, and by contrasting the lintel color to the color of the other parts of the pre-cast facades.

B. CG OVERLAY AND OTHER ZONING RELIEF REQUESTED

§1604.9 provides that "The Commission may hear and decide any additional requests for special exception or variance relief needed for the subject property. Such requests shall be advertised, heard, and decided together with the application for Zoning Commission review and approval."

The applicant has requested Zoning Commission relief from the roof structure requirements of § 770.6, as referenced to §411. Regulations require a roof structure's enclosing walls to be of equal height and to rise vertically. The applicant has chosen to slope the walls horizontally so that the western end is 4'10" lower than the eastern end, and to slope the southern and western walls vertically inward. The applicant is also showing a horizontally projecting metal framework on the 2nd Street side of the roof structure and a smaller projection on the M Street side. The applicant's design intention is to create a distinctive "frame" for the southern end of the Canal Blocks, in conjunction with the somewhat similarly designed Federal Gateway Building to the west.

Concerns at Setdown:

- *The eastern side of the penthouse was not set back appropriately.*
 - o The applicant has corrected this; setback relief is no longer required.
- The penthouse was too large, and looked like an additional story.
 - The applicant has set back the eastern side from the parapet; removed any connecting walls between the penthouse and the architectural embellishment on the south side (the tower); and reduced the size of the penthouse so that it is now 0.23 FAR well below the permitted 0.37 FAR. In OP's opinion, the structure now reads clearly as a penthouse.
- The penthouse seemed to have large empty areas of potentially occupiable space next to the roof terrace.
 - The applicant has submitted more detailed roof plans to OP that demonstrate the space will not be used for other than mechanical purposes. The applicant should submit this information to the Zoning Commission.

- The sloping walls and western-facing trellis call too much attention to the penthouse, which the zoning regulations intend to be an inconspicuous and uniform element.
 - o Although the size of the roof structure has been reduced and the overhang atop the sloping walls is now thinner and remains within the setback line, the design of the penthouse remains distinctive and sculptural.

In OP's opinion the shape of the penthouse contributes positively to the appearance of the building and the southern end of the Canal Blocks. In viewing the M Street elevation on Sheet A2.01A of the applicant's August filing, the slope of the penthouse is important to the building composition and, when seen from afar the roof structure's descending angle from east to west animates the building by acting as a counterpoint to its otherwise static, rectilinear proportions.

With respect to the trellis, OP finds it to be a useful solar shield for the western-facing roof deck, and a successful termination of the building when it is viewed from both the western side of the Canal Blocks and from the upper stories of nearby buildings.

OP shares the Commission's concern that a number of recent high-rise buildings have employed highly visible and arbitrary roof elements that serve little purpose other than to call attention to the buildings' presence. There is an inevitable tension between the desire to have buildings defer to the primacy of structures symbolic of our nation, and the desire to bring visual interest to the shape of the Washington streetscape and skyline. In OP's opinion, Section 411 of the Zoning Regulations grants the Commission the tools for addressing this concern by exercising "a reasonable degree of architectural control upon roof structures in all districts." The regulations assume that, unless otherwise approved through the special exception or PUD process, the tops of Washington buildings will be flat boxes set back from the building parapet. The special exception provision gives the Commission the power to allow variations from this stipulation, as long as a "reasonable degree of architectural control" is exercised and the Height Act is respected.

OP believes the applicant's roof structure design would enhance its appearance as well as the appearance of the southern end of the Canal Blocks, and varies from the matter of right requirements within "a reasonable degree".

V. ADDITIONAL OP COMMENTS ON 2ND STAGE APPLICATION

OP had asked the applicant to supply additional information about the type of green roof system
that would be used. The applicant has since provided more information on the extensive green
roof system.

VI. AGENCY COMMENTS

DDOT met with the applicant and recommended changes to the paving patterns on 2nd and 3rd Streets. These have been made, although the M Street design requires additional refinement.

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VII. COMMUNITY COMMENTS

ANC 6D voted to oppose the project. The vote was 3 in favor of the application and 4 against it.

VII. SUMMARY AND RECOMMENDATION

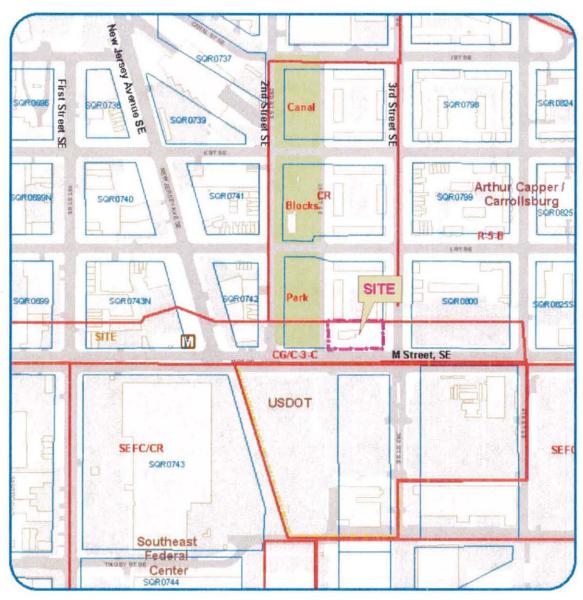
The Office of Planning believes that this application conforms to the requirements laid out in Zoning Commission Orders Numbers 03-12A and 03-13A. It is consistent with the goals and objectives for the area as outlined in the Comprehensive Plan and in the previously approved Preliminary PUD and Consolidated PUD. Additionally, the proposal generally meets the goals and objectives for the CG Overlay goals for retail space to create and active and welcoming pedestrian character along M Street.

OP recommends that the Commission approve this application, contingent on the provision of the following information:

- Corrected Sheets A2.01 and A2.03;
- A countersigned LSDBE agreement;
- Design revision to enhance the paving on M Street in accordance with AWC standards.
- A more detailed roof plan diagram showing the location of the mechanical equipment.

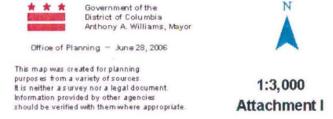
EMC/slc

Attachments (3)





ZONING COMMISSION CASE 03-12 / 03-13 SECOND STAGE PUD - PHASE 2 250 M STREET SE - LOCATION MAP







ZONING COMMISSION CASE 03-12 / 13-13 250 M STREET SE - SITE PLAN



Government of the District of Columbia Anthony A Williams, Mayor

Office of Planning ~ June, 2006

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



Attachment 2

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