

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Crystal Myers, Development Review Specialist
MBR Maxine Brown-Roberts, Associate Director of Development Review

DATE: July 17, 2026

SUBJECT: OP Public Hearing Report - ZC #26-05 –Voluntary design review for a new office building with ground floor retail at 2100 M Street, NW in the D-5 zone

I. RECOMMENDATION

The Office of Planning (OP) recommends that the Zoning Commission **approve** this voluntary design review application requested pursuant to Subtitle X Chapter 6, and approve the following requested flexibility, pursuant to X § 603:

- C § 1504, Penthouse Setback (15 ft. mechanical penthouse max.; 18 ft.6 in. proposed);
- G § 207, Closed Court Width (less than 2.5 in per 1 ft of height)
- I § 201.6, Height (50 feet MOR max.; 65 feet max. with design review; 59 feet proposed);
- I § 203, Front-Build (5 ft. minimum; 0 ft. minimum proposed);

Though no zoning relief is needed the Applicant is also requesting flexibility from the requirements of C § 805, Long-Term Bicycle Parking Location (flexibility to relocate to first level of garage).

OP along with the Department of Energy and Environment (DOEE) encourages the applicant to consider installing on-site renewable energy systems, such as rooftop solar panels.

II. APPLICATION-IN-BRIEF

Address	2100 M Street, NW
Zoning	D-5
Applicant	BXP 2100M LLC
Ward and ANC	Ward 2; ANC 2A
Planning Area	Near Northwest/Central Washington
Legal Description	Square 0072, Lots 0075
Land Area of Site	4,1196 square feet

III. SITE AND AREA DESCRIPTION

The subject property is located at the intersection of 21st Street, NW, M Street, NW, and New Hampshire Avenue, NW. It sits along the western edge of the Golden Triangle neighborhood and

the eastern edge of the West End neighborhood. The site is currently occupied by a vacant office building. It is adjacent to a hotel that includes a ground-floor restaurant in the MU-10 zone.

IV. PROJECT DESCRIPTION

The project entails the demolition of the existing building on the site and the construction of a new 10-story office building with an 8.0 FAR and approximately 8,742 square feet of ground-floor retail space. According to the Applicant, a global law firm has pre-leased approximately 75 percent of the building, serving as its primary tenant.

The proposed massing incorporates step-backs along the sides and upper floors, providing additional light and air while voluntarily foregoing approximately 40,000 square feet of by-right density. Consequently, the building would contain 10 floors rather than the 11 that could otherwise be constructed. This height is more compatible with the character and scale of the surrounding area.

The building's design seeks to enhance the site's visual presence and capitalize on its prominent location at the intersection of M Street NW and 21st Street NW. A defined building prow would anchor this intersection, and the main entrance would be located on the northern façade. Ground-floor retail uses are expected to activate the adjacent park to the north and complement existing restaurant uses along New Hampshire Avenue. The 21st Street frontage, which is currently less active, would contain the office lobby entrance. Given the unusually long block length along this portion of 21st Street, locating the lobby at mid-block is intended to break up the façade and improve the pedestrian experience.

The project also includes a range of public-realm improvements, such as enhanced landscaping and the reduction of the existing curb cut on 21st Street to accommodate a ramp to underground parking and loading. The Applicant anticipates that all or a portion of the ground-floor retail space will be leased to a restaurant with a sidewalk café. Pending approval by the Public Space Committee, the sidewalk café would substantially contribute to the quality of the public realm and complement the nearby Duke Ellington Park.

V. ZONING ANALYSIS

The subject property is zoned D-5, which is intended to permit a mix of high-density office, retail, service, and other uses. The table outlines the development standards of the D-5 zone versus the proposed.

D-5 Zone	Regulation	Proposed	Relief
Lot Area	n/a	41,496 square feet	Conforming
Floor Area I § 200	9.05 max (with density credits)	8.1	Conforming
Height I § 201	130 ft. max.	130 ft.	Conforming

D-5 Zone	Regulation	Proposed	Relief
Penthouse Height G § 540.5	20 ft. max./1 story; 2 nd story permitted for mechanical space	20 ft./1 story	Conforming
Rear Yard I § 205	Not required	0	Conforming
Side Yard I § 206	Not required	0	Conforming
Lot Occupancy I § 202.1	100%	95.7%	Conforming
GAR I § 208.1	0.2 min	0.2	Conforming
Vehicle Parking C § 701	Office = 167 min Retail = 8 min	250	Conforming
Loading C § 901	3 berths 3 platforms 1 delivery space	3 berths 3 platforms 1 delivery space	Conforming
Bicycle Parking C § 802	Office Short Term = 9 min Office Long Term = 96 min. Retail Short Term = 3 Retail Long Term = 1	Office Short Term = 9 Office Long Term = 96 Retail Short Term = 3 Retail Long Term = 1	Conforming
Bicycle Parking: Location C § 805.2	On level no lower than first cellar level, or on first complete parking level	On ground floor with flexibility to locate on 1st parking level	Flexibility Requested
Penthouse Setback C § 1504.1	1:1 setback min.	See A-4.09 (Ex 8A6)	Flexibility Requested
Closed Court Width G § 207	2.5 in./ 1 ft of height	See sheet A- 2.13 (Ex 8A4)	Flexibility Requested
Front Build-To Line I § 201	Build to 75% min. requirement within 4 ft. of property line up to a height of at least 15 ft.	Setback from property line to be increased to 6 ft. along New Hampshire Ave.	Flexibility Requested
Height Setback I § 201.6(b)	45-degree continuous plane step back from adjacent MU-10 property	A step back articulated by floor	Flexibility Requested

VI. DESIGN REVIEW FLEXIBILITY

As part of a design review application, the Commission may grant flexibility to certain development standards, pursuant to Subtitle X § 603. In this case, the Applicant requests flexibility from height, penthouse setback, court width, and long-term bicycle parking requirements. The relevant criteria are evaluated below.

603.1 As part of the Design Review process, the Zoning Commission may grant relief from the development standards for height, setbacks, yards, lot occupancy, courts, and building transitions; as well as any specific design standards of a specific zone. Except as allowed pursuant to Subtitle X § 603.2, the Design Review process shall

not be used to vary other building development standards including FAR, Inclusionary Zoning, or Green Area Ratio.

- 603.3 *Except for height, the amount of relief from the standards authorized by Subtitle X § 603.1 is at the discretion of the Zoning Commission, provided that the relief is required to enable the applicant to meet all of the standards of Subtitle X § 604. The Zoning Commission may grant no greater height than that permitted if the application were for a PUD.*

Subtitle I § 201.6(b) - Height Setback

201.6 *No part of a new building or a vertical expansion of an existing building on a lot within a D zone shall project above a plane at a forty-five degree (45°) angle from a line that is:*

- (a) . . .
- (b) *Above a boundary line described in Subtitle I § 201.6(a), or an MU-zoned lot west of 20th Street, N.W. by the distance of the matter-of-right height for a building on the abutting R, RA, or MU-zoned lot.*

The Applicant has requested flexibility from the requirement that the building be set back at a 45-degree angle away from the 90-foot maximum height in the MU-10 zone, which abuts the property on the west side. This requires that the building be stepped back by a continuous plane, however, the Applicant is requesting that it be done by floor. This would allow the step back to be done by breaking up the massing on west side of the building to allow additional light and air into the building. It would also allow for a more rational floor plate for the office use as complying with the requirement would cause problems with the building's core and result in shallow, single-loaded corridors on the upper floors where the setbacks are required. **OP is supportive of the requested flexibility.**

Subtitle C § 1504.1 - Penthouse Setback Requirements

1504.1 *Except as exempted by Subtitle C §§ 1504.2 to 1504.4, a penthouse or rooftop structure shall be set back from the edge of the roof upon which it is located, measured from a point where a line extending from the top of the roof intersects with the outside face of the building enclosing wall, as follows:*

The Applicant requests flexibility regarding the guardrail on the uppermost roof deck. The building's design features an angular point at the intersection of M Street and 21st Street, and with a recessed façade on the upper floors create a tower-like element that accentuate this corner. The roof extends over this façade of the building and follows the property line. The proposal is 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. This allows the guardrail to be a consistent around the roof terrace instead having the them at a different setbacks around the roof which could also reduce the occupiable outdoor space on the roof terrace. **OP is supportive of the requested flexibility.**

Subtitle I § 203.1 - Front-Build To Line

203.1 *In the D-1-R, D-3, D-4-R, D-5, D-5-R, D-6, D-6-R, and D-7 zones, at least seventy-five percent (75%) of each newly constructed building wall fronting a street shall be*

constructed to or within four feet (4 ft.) of the property line between the subject lot and the abutting street right-of-way, to a height of at least fifteen feet (15 ft.) above the higher of the building's measuring point or the level of the curb from which the building is drawing its height, provided the building wall:

(a) . . .

(b) Faces an avenue named after the official name of a state, commonwealth, or district in the United States of America.

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. This would allow more light and air into the property and building as well as to the adjacent property. The existing building is also stepped back similarly which allows the adjacent building, at 1143 New Hampshire Avenue. NW, to have an additional opening at the entrance of their commercial space, which is currently occupied by Call Your Mother Deli. This flexibility would also allow the new building to not close this opening. **OP is supportive of the requested flexibility.**

Subtitle I § 207.1 - Court Width

The closed courts along the western side of the building require flexibility from the court width requirements. These reduced courts widths would allow for more light and air to reach the center of the block and to the neighboring buildings. The Applicant states that these courts further engage the pedestrian and vehicular network and thus creating an engaging façade. **OP is supportive of the requested flexibility.**

Subtitle C § 805- Long-term bicycle parking location

805.5 Where required long-term bicycle parking is provided in a bicycle room, the room shall have either solid walls or floor-to-ceiling fencing. The room shall have locked doors.

The Applicant is proposing and requesting flexibility to locate the long-term bicycle parking on either the ground floor or on the first below-grade level of the garage and would meet the bicycle parking requirements of Subtitle C § 805. The determination of the exact location will be determined in conjunction with DDOT. **OP is supportive of the requested flexibility.**

The proposed areas of flexibility – height setback, penthouse setback, front build to line, court width, and long- term bike parking location – would enable the Applicant to meet all the standards of Subtitle X § 604, and allow the Applicant to deliver an efficiently designed building that achieves the development potential of the D-5 zone and maximize the light and air on the property.

VII. DESIGN REVIEW ANALYSIS

604.1 The Zoning Commission will evaluate and approve or disapprove a design review application subject to this chapter according to the standards of this section and for Mandatory Design Reviews subject to this chapter according to the standards stated in the provisions that require Zoning Commission review.

- 604.2 *For Mandatory Design Review, the application must also meet the requirements of the provisions that mandated Zoning Commission approval.*
- 604.3 *The applicant shall have the burden of proof to justify the granting of the application according to these standards.*
- 604.4 *The applicant shall not be relieved of the responsibility of proving the case by a preponderance of the evidence, even if no evidence or arguments are presented in opposition to the case.*

The applicant requested a *Voluntary Design Review* to request flexibility for height and penthouse setbacks, front build-to, court width, and to relocate long-term bicycle parking.

- 604.5 *The Zoning Commission shall find that the proposed design review development is not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site.*

See Comprehensive Plan section of this report.

- 604.6 *The Zoning Commission shall find that the proposed design review development will not tend to affect adversely the use of neighboring property and meets the general special exception criteria of Subtitle X, Chapter 9.*

The proposed development should not affect adversely the use of neighboring properties, and would meet the intent of the Regulations. The proposed development would not adversely impact the use of neighboring properties as it would have features that would allow for adequate light and air to the adjacent properties and thus aligning with the intent of the Regulations. It would revitalize the site and deliver an office building with ground floor retail project consistent with the purpose of the D-5 zone, which encourages high-density commercial and mixed-use development in the downtown.

- 604.7 *The Zoning Commission shall review the urban design of the site and the building for the following criteria:*
- (a) *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;*

The plans indicate that the building's street frontages are designed to be safe, comfortable, and supportive of pedestrian activity. The location of the entrances and the ground-floor layout should help activate the streetscape and complement nearby Duke Ellington Park. At the northern corner, the "secondary" office entrance and retail spaces would reinforce the existing pedestrian environment created by the park and nearby retail establishments. The plans show three retail entrances and one office entrance along the northern end. The office entrance near New Hampshire Avenue would serve tenants on that side, while a second main office entrance

on the eastern frontage along 21st Street would allow tenants to enter either side of the building. A third entrance along 21st Street would be for accessing office-support uses, such as a fitness center or other amenities, and would serve for emergency egress.

The project would retain the existing garage entrance on 21st Street, providing direct access to the street. The proposal includes narrowing the existing curb cut and consolidating the truck and car entrance, which should improve pedestrian safety. OP defers to DDOT for evaluation of the adequacy of the garage entrance and curb-cut design. OP notes, however, that the internal configuration allows for head-in—head-out truck maneuvers, rather than requiring trucks to back in to a loading dock across public space. This should also improve the pedestrian environment.

At the ground-floor level, the building features tall, clear glass façades. The Applicant anticipates restaurant or retail uses in the commercial spaces, with the possibility of an outdoor sidewalk café. These uses should help activate the northern frontage, particularly given the proximity of Duke Ellington Park. Along 21st Street, where pedestrian activity has historically been lower, the office lobby is intentionally located to strengthen the streetscape. The block along 21st Street is unusually long. Positioning the lobby mid-block helps to break up the façade on this side. While sidewalk widths are not shown on the plans, the Applicant has informed OP that the M Street sidewalk would be approximately 23 feet wide, providing ample space for pedestrians and a sidewalk café.

- (b) *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;*

The subject property is not near transit and there are other public gather space options in the area. In order to utilize more of the property, the project would reduce the existing open space by considerably shrinking the plaza space at the intersection. While there would not be spaces open to the public, the ground floor retail and possible sidewalk café would contribute to activating and improving the public space and would complement the nearby small Duke Ellington park. The project also includes streetscape improvements. The proposal would improve upon the existing condition, where the vacant use and vacant plaza have led to a dead zone in the streetscape over a number of years.

- (c) *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;*

The design of the proposed development respects the historic character of the area. The property

is at an important intersection in the L'Enfant Plan where three major avenues and the West End, Dupont Circle, and Downtown neighborhoods meet. The proposed design takes advantage of this prominent location by providing a building with an intriguing façade. The building uses similar materials and massing as other buildings in the area to keep in character with the area. The use of glass, stone, terracotta, and textured metal were used to respect the mix of masonry and modern styles in the area.

- (d) *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;*

The plans indicate that the proposed building would feature an attractive and thoughtfully designed façade that enhances the surrounding area. Its use of glass, stone, terracotta, and other textured materials allows it to blend well with neighboring buildings. A series of podiums and multi-level terraces provide additional articulation to the façade, while the roof steps back at each end to maximize light and air reaching the interior courtyard. Both street-facing sides of the building contribute to an active public realm through large glass windows and planned streetscape improvements.

- (e) *Sites are designed with sustainable landscaping; and*

The project intends to achieve LEED Gold v4 but does not provide details about the planned landscaping. The plans indicate that a substantial portion of the roof would be dedicated to green roof features; however, no solar panels are shown. The application states that the project would meet the GAR requirement of 0.2. **OP and DOEE recommend that the project incorporate a significant commitment to solar energy.**

- (f) *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*

The site design supports both internal and external connectivity. As noted earlier, the office entrances link both sides of the building, allowing tenants to move through the structure with ease. Retail entrances along the northern frontage take advantage of the small park across the street and the prominent intersection, which should help the retail spaces attract passing pedestrians.

The wide open space along 21st Street should allow ample space for pedestrian movement and landscaping. Sidewalk and parking conditions appear adequate and safe. The property is also a reasonable walking distance from both Foggy Bottom and Dupont Circle Metrorail stations. The project provides 97 long-term and 12 short-term bicycle parking spaces. OP defers to DDOT for a full assessment of the project's transportation and circulation elements.

604.8 The Zoning Commission shall find that the criteria of Subtitle X § 604.7 are met in a way that is superior to any matter-of-right development possible on the site.

The proposal would result in a development that would be superior to a matter of right development on the site. It would allow the site to be redeveloped with an attractively designed office building on a prominent corner of the city. Without the requested design flexibility, the applicant would not have sufficient space to allow additional light and air to reach the building and adjacent properties. They would also not have a rational floor plate for office use.

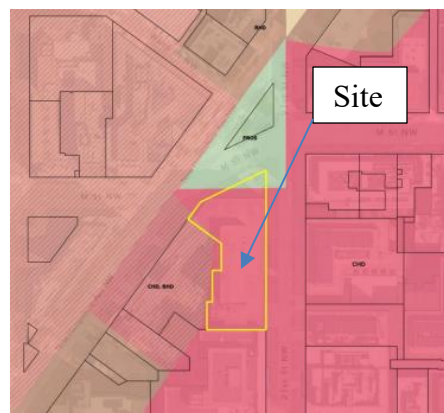
VIII. COMPREHENSIVE PLAN

In order to approve a design review application, Subtitle X § 604.5 requires that the Commission determine that a proposed development is not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site. The Zoning Commission must consider the many competing, and sometimes conflicting, policies of the Comprehensive Plan, along with the various uses, development standards and requirements of the zone districts. It is the responsibility of the Zoning Commission to consider and balance those policies relevant and material to the individual case before it in its decision making.

A. COMPREHENSIVE PLAN MAPS

The Comprehensive Plan's land use maps work together with written policies to help guide the development of land uses in the District.

Future Land Use Map



The Future Land Use Map identifies the subject site as suitable for High Density Commercial. The Framework Element of the Comprehensive Plan describes that category as follows:

High Density Commercial: This designation is used to define 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 a FAR of 6.0 are the predominant use, although high-rise residential and many lower scale buildings (including historic buildings) are interspersed. The MU-9, D-3, and D-6 Zone Districts are consistent with the High Density Commercial category, and other zones may also apply. 227.13

The proposed 8.1 FAR and 130 feet in height for the building would not be inconsistent with this designation.

Generalized Policy Map



The site is designated as Institutional on the Generalized Policy Map which is described in the Framework Element of the Comprehensive Plan as follows:

Institutional: *This designation includes land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions. While included in this category, smaller institutional uses such as churches are generally not mapped, unless they are located on sites that are several acres in size. Zoning designations vary depending on surrounding uses. Institutional uses are also permitted in other land use categories. 227.18*

Although the proposal is not an institutional use, it is not inconsistent with the Generalized Policy Map. This is supported by the Policy Map guidelines, which explain that both the Policy Map and the Future Land Use Map “provide generalized guidance for development and conservation decisions and are considered in concert with other Comprehensive Plan policies.” When considering the property’s high density commercial FLUM designation along with the various other Comprehensive Plan policies, which are discussed below, the proposal is not inconsistent with the Generalized Policy Map.

B. COMPREHENSIVE PLAN WRITTEN ELEMENTS

Comprehensive Plan Analysis through a Racial Equity Lens and the Zoning Commission's Racial Equity Tool

The Comprehensive Plan requires an examination of zoning actions through a racial equity lens. The direction to consider equity “as part of its Comprehensive Plan consistency analysis” indicates that the equity analysis is intended to be based on the policies of the Comprehensive Plan and part of the Commission’s consideration of whether a proposed zoning action is “not inconsistent” with the Comprehensive Plan. The Comprehensive Plan recognizes that advancing equity requires a multifaceted policy approach and that many areas of policy must be brought to bear on the challenge:

Equitable development is a participatory approach for meeting the needs of underserved communities through policies, programs and/or practices that reduce and ultimately eliminate disparities while fostering places that are healthy and vibrant. Equitable development holistically considers land-use, transportation, housing, environmental, and cultural conditions, and creates access to education, services, health care, technology, workforce development, and employment opportunities. As the District grows and changes, it must do so in a way that encourages choice, not displacement, and builds the capacity of vulnerable, marginalized, and low-income communities to fully and substantively participate in decision-making processes and share in the benefits of the growth, while not unduly bearing its negative impacts. 213.7

The Commission’s four-part Racial Equity Tool outlines information to be provided to assist in the evaluation of zoning actions through a racial equity lens. The Applicant’s Racial Equity Analysis is provided at [Exhibit 3G](#) and OP’s analysis is provided below.

Racial Equity Tool Part 1 – Comprehensive Plan Guidance

Land Use Element

- Policy LU 1.2.1: Sustaining a Strong District Center
- Policy LU-1.2.2: CEA
- Policy LU-1.2.3: Appropriate Uses in the CEA
- Policy LU-1.2.6: CEA Edges
- Policy LU-2.4.6: Scale and Design of New Commercial Uses

The proposal is not inconsistent with the Land Use Element. It would introduce new investment into the Central Employment Area (“CEA”) by replacing an older, vacant office building with a modern, high-quality structure. The new building would accommodate additional office, and retail uses that are appropriate for this location. Its design responds to the site’s prominent position while respecting the unique edge conditions through carved upper-level volumes and strategic setbacks that create context-sensitive transitions. Overall, the building’s scale and form would be well-suited to a commercial area and compatible with the surrounding neighborhood.

Economic Development Element

- Policy ED-1.1.1: Core Industries
- Policy ED-1.1.2: Economic Linkages
- Policy ED-1.1.6: Competitive Edges
- Policy ED-2.1.1: Office Growth
- Policy ED-2.1.3: Signature Office Buildings
- Policy ED-2.1.5: Infill and Renovation

The proposal is not inconsistent with the Economic Development Element. It would introduce a new office building in Central Washington, an area designated for a high concentration of office and business activity. By delivering a modern building with a committed tenant, the project would help strengthen and revitalize the downtown office market. It would also generate new employment opportunities. As infill development, the proposal makes efficient use of a prominent commercial site with a vacant building by redeveloping it into a new office building, rather than locating elsewhere in the city and potentially displacing existing businesses.

Environment Element

- Policy: E-1.1.2: Urban Heat Island Mitigation
- Policy: E-4.2.1: Support for Green Building
- Policy E-1.1.2: Urban Heat Island Mitigation
- Policy E-4.2.1: Support for Green Building

The proposal is not inconsistent with the Environmental Protection Element. It would meet the Green Area Ratio requirements as well as stormwater retention requirements, and the project team has committed to achieving LEED Gold v4 certification. Though the project is not inconsistent with this Element it could do more to further it. **OP recommends that the applicant also consider incorporating solar energy generation, which would help further the Environmental Element's renewable energy policies. An effective way to do this would be to integrate solar photovoltaic arrays into the building's green roofs. Both DOEE and OP encourage the project to explore this option. As DOEE notes, "Integrating these systems enables the project team to maximize the benefits of solar energy while also maximizing the Green Area Ratio and stormwater retention volume."**

Urban Design

- Policy UD-1.1.3: Preeminent View Corridors
- Policy UD- 2.2.4: Transitions in Building Intensity
- Policy UD- 2.2.5: Infill Development
- Policy UD- 4.2.1: Scale and Massing of Large Buildings
- Policy UD- 4.2.2: Engaging Ground Floors
- Policy UD-4.2.3: Interesting Roof Lines
- Policy UD-4.2.4: Creating Engaging Facades
- Policy UD-4.2.5: Creating Engaging Facades
- Policy UD-4.3.3: Building Setbacks and Rooflines

The proposal is not inconsistent with the Urban Design Element. In fact, it would advance several

Urban Design policies by enhancing the streetscape and improving the overall appearance of the site. The building's design acknowledges its prominent and highly visible location at a key intersection of the L'Enfant Plan, where three major avenues converge and the West End, Dupont Circle, and Downtown neighborhoods meet. The plans demonstrate that its scale and massing would be thoughtfully articulated through carved volumes, upper-level setbacks, and varied roof forms that create visual interest.

At the street level, the building would feature an attractive ground floor with multiple entrances, a potential sidewalk café, and varied frontage conditions that would enliven the sidewalk. Retail uses would draw customers and further activate the public realm. Overall, the project is expected to create a more welcoming and engaging experience along each street frontage.

Central Washington Element

- Policy: CW- 1.1.1: Promoting Mixed Use Development
- Policy: CW- 1.1.2: Central Washington Office Growth
- Policy: CW- 1.1.11: Reinforcing Central Washington's Characteristic Design Features
- Policy: CW- 1.1.23: Architectural Excellence
- Policy: CW- 1.1.12: Creating Active Street Life and Public Spaces
- Policy: CW-1.1.16: Making Central Washington's Streets More Pedestrian Friendly

The property lies within the Near Northwest planning area but sits along the 21st Street boundary shared with the Central Washington Area Element. Because the zoning, land use designations, and development characteristics are more consistent with Central Washington policies, OP evaluated the proposal primarily against the Central Washington Element. Although the Near Northwest Element offers limited guidance for this type of project, it does not include any policies that would conflict with the project. Therefore, the proposal is not inconsistent with either the Near Northwest Element or the Central Washington Element.

The project's mix of office and retail uses within a well-designed building would advance Central Washington policies supporting mixed-use development and high-quality design, particularly in prominent locations. It would also align with guidance encouraging additional office development in this part of the District. Furthermore, by incorporating retail uses, a potential sidewalk café, and lobby entrances on both street frontages, the project would help activate the streetscape and contribute positively to the surrounding public realm.

Comprehensive Plan policies related to racial equity will potentially not be advanced by approval of the zoning action?

Neither OP nor the Applicant found Comprehensive Plan policies that would be contrary to racial equity if this proposed voluntary design review were approved.

Racial Equity Tool Part 2 – Applicant's Outreach

The Applicant held a special community meeting on April 27, 2026, at the West End Neighborhood Library. The Applicant also presented the project to ANC 2A on April 15, 2026, and again on June 17, 2026, after which ANC 2A submitted a [letter in support](#). In addition, due to

the site's close proximity to ANC 2B, the Applicant presented to ANC 2B's Licensing and Permitting Committee on June 10, 2026. The Applicant had planned to present at ANC 2B's June meeting; however, because that meeting was canceled, they now expect to be scheduled for the July meeting.

Racial Equity Tool Part 3 – Planning Area Data

The subject property is along the boundary of Near Northwest planning area and the Central Washington Planning Area. Though technically within the Near Northwest planning area OP used the planning area data for Central Washington because of the site's downtown zoning is more in line with Central Washington. Each table below compares data for this planning area with District-wide data. This data is from 2012-2016 and 2020-2024 American Community Survey 5 Year Estimates by Planning Area available via the OP State Data Center ([ACS DATA](#)).

Population Profile – Central Washington

Population by Race or Ethnicity

The Central Washington Planning Area has a majority white population at 54% in the 2020-2024 period. The second largest demographic group at 24% is Black residents, and with the District-wide trend, this group declined since the 2012 to 2016 period. All other groups in the planning area have increased since the 2012 to 2016 period.

Race or Ethnicity	Districtwide 2012-2016	CW 2012-2016	CW % 2012-2016	Districtwide 2020-2024	CW 2020-2024	CW % 2020-2024
Total Population	659,009	17,976	100%	681,294	24,381	100%
White alone	266,035	9,250	51%	258,050	13,053	54%
Black alone	318,598	5,698	32%	286,997	5,843	24%
American Indian and Alaskan Native alone	2,174	5	0%	2,528	32	0%
Asian alone	24,036	2,010	11%	29,748	2,552	10%
Native Hawaiian and Other Pacific Islander alone	271	0	0%	336	0	0%
Some other race alone	29,650	481	3%	1,293	642	3%
Two or more races	18,245	532	3%	65,157	2,258	9%

Hispanic or Latino	69,106	1,493	8%	81,152	2,370	10%
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Median Household Income

Central Washington had a higher median income than the District’s median income during both five-year periods. As with the Districtwide trend the group with the highest median income was the White residents’ group. Different from the Districtwide trend was that the group with the second highest median income during the 2019 to 2023 was the Hispanic/Latino residents’ group.

During both five-year periods the Black or African American population had the lowest median income of all segments of the population with available income information during both time periods, (\$24,232 and \$39,860). They along with White, Asian, and Hispanic residents saw an increase in median income between the two periods.

Between the two five-year periods both Some other Race and Two or More Races experienced a decrease in their median income.

Median Income (disaggregated by race and ethnicity)	Districtwide 2012-2016	CW 2012-2016	Districtwide 2020-2024	CW 2020-2024
Median Household Income	\$72,935	\$86,637	\$110,689	\$119,859
White alone	\$119,564	\$110,772	\$170,843	\$146,051
Black or African American alone	\$ 40,560	\$24,232	\$ 60,780	\$39,860
American Indian and Alaskan Native alone	\$ 51,306	Not Available	\$ 67,557	Not Available
Asian alone	\$ 91,453	\$66,925	\$126,507	\$77,492
Native Hawaiian and Other Pacific Islander alone	N/A	Not Available	Not Available	N/A
Some other races	\$ 41,927	\$114,149	\$89,693	\$95,704
Two or more races	\$ 83,243	\$119,122	\$122,979	\$107,993
Hispanic or Latino	\$60,848	\$91,589	\$116,177	\$129,751

Higher Education

In both time periods more residents in Central Washington had bachelor’s degrees or higher than residents District-wide. When looking at race/ethnicity most groups have significantly improved since the 2012-2016 period. Similar to citywide trends, Black residents in the planning area continue to have the lowest rates of attainment for a Bachelor’s degree or higher.

Higher Education in the Planning Area and District

Bachelor’s Degree or Higher	Districtwide (2012-2016)	CW (2012-2016)	Districtwide (2020-2024)	CW (2020-2024)
Total	55.4%	68.9%	64%	80.2%
White alone	87.7%	91.8%	92.8%	94.4%
Black or African American alone	24.8%	25.8%	34.3%	39.6%
American Indian and Alaskan Native alone	43.5%	27.5%	42.7%	37.1%
Asian alone	77.9%	71.6%	86.5%	73.3%
Native Hawaiian and Other Pacific Islander alone	63.7%	N/A	79.9%	N/A
Some other races	26.2%	54.8%	40.1%	62.7%
Two or more races	67.8%	71.4%	70%	89.4%
Hispanic or Latino	42.8%	71.4%	56.3%	86.6%

Unemployment/Poverty/Cost Burden

In 2012–2016, Central Washington had an unemployment rate of 6.3%, lower than the District’s rate of 8.7%. By 2020–2024, both areas saw improvement, with unemployment declining to 3% in Central Washington and 6.5% in the District.

During the 2012–2016 period, Central Washington and the District had nearly identical cost burden rates (38%) and poverty rates (17.9%). In 2020–2024, Central Washington’s cost burden rate worsened slightly, while the District’s improved. Poverty rates decreased in both areas, though the District experienced a greater reduction. As a result, during the 2020–2024 period, Central Washington’s cost burden and poverty rates were slightly higher than those of the District.

Table 4: General Characteristics of the District and the Planning Area

Characteristic	Districtwide 2012-2016	CW 2012-2016	Districtwide 2020-2024	CW 2020-2024
Unemployment Rate	8.7%	6.3%	6%	3%
Cost Burdened Households¹	38.6%	38%	34%	39%

¹ Percentage of households spending 30% or more of their income on housing

Poverty Rate	17.9%	17.9%	15.4%	16.7%
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Zoning Commission Evaluation Factors

Factor	Question	OP Response
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	No. There is a vacant office building on the site and no residential uses, so the proposed project would not result in any direct displacement of residents.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	OP does not anticipate indirect displacement as a result of this project. Indirect displacement usually occurs when a new development raises the property values and rents in an area. In this case, the property is located in one of the most expensive areas of the city so it would likely have no significant impact.
Physical	Will the action result in changes to the physical environment such as: ▪ Public Space Improvements ▪ Infrastructure Improvements ▪ Arts and Culture ▪ Environmental Changes ▪ Streetscape Improvements	The redevelopment of the site would result in a significantly improved streetscape and pedestrian realm around the property. The proposal would also improve the environmental performance of the property through new landscaping and green roofs, though the applicant should commit to solar energy and a LEED Gold level.
Access to Opportunity	Is there a change in access to opportunity? ▪ Job Training/Creation ▪ Healthcare ▪ Addition of Retail/Access to New Services	The application should have a neutral impact on access to opportunity. There should be no positive or negative impacts to job training or job creation, or healthcare. .

IX. AGENCY AND DIVISION COMMENTS

The following comments were provided to the applicant, some of which will be further evaluated at the time of Public Space Review.

Urban Design Division

OP's Urban Design Division provided the following comments:

Public Space

- **Building projections** — Multiple façade projection elements appear to extend into public space. A full projection analysis is needed with dimensioned callouts for each element. Several projections seem to exceed what is permitted under current District regulations; if the design team intends to retain them, a code modification request will likely be required.
- **Sidewalk café zone** — Exhibit 9 shows a proposed sidewalk café along 21st Street NW. The team must demonstrate adequate clear sidewalk width, ADA compliance, and compatibility with existing pedestrian volumes. Café placement should also be evaluated against the angled corner geometry and tree spacing.
- **Short-term bike parking** — All short-term racks are clustered at the northwest corner.

Consider whether distribution along M Street or New Hampshire Avenue

- **Loss of plaza space** — The existing plaza is eliminated in the new proposal. This is a significant public-realm change at a prominent three-street intersection. The applicant should justify the removal and demonstrate how the new design maintains or improves public-realm quality, especially given proximity to Duke Ellington Park.
- **Public seating** — Only two scattered seating elements are shown. Additional seating — integrated with landscape, shade, or building frontage — could strengthen the pedestrian experience and compensate for the lost plaza.
- **Landscape** — With the reduction of public space in the building plan, and the inclusion of green roofs, please quantify the cumulative amount of green space that is projected at the ground level as well as on the structure.

Massing & Corner Strategy

- The sharp-angle corner at the intersection of M Street, 21st Street, and New Hampshire Avenue creates a strong visual gesture toward Duke Ellington Park. The design team should demonstrate that the angle improves pedestrian legibility, corner visibility, and public-realm comfort, rather than functioning as a purely formal move.
- Evaluate whether the acute corner creates any sidewalk pinch points, especially where pedestrian flows converge from three directions.

Building Projection

- Projection elements should be evaluated not only for regulatory compliance but also for their contribution to façade depth, shading, and pedestrian-scale articulation.
- Any large cantilevers or angled projections near the acute corner should be assessed for potential wind effects and microclimate impacts.

Department of Energy and Environment (DOEE)

DOEE provided comments shown at Attachment 2.

As of this writing, OP has received no other agency comments, and no other comments are in the record.

X. ANC COMMENTS

ANC 2A submitted a [letter in support](#).

XI. COMMUNITY COMMENTS

The owner of the adjacent property of the Yours Truly hotel at 1143 New Hampshire Ave, NW, which is the adjacent MU-10 zoned property to the west submitted a [letter in support](#).

XII. ATTACHMENTS

Attachment 1 – Comprehensive Plan Policies

Attachment 2- DOEE Comments

Attachment 1

Comprehensive Plan Policies

Land Use Element

Policy LU-1.2.1: Sustaining a Strong District Center

Provide for the continued vitality of Central Washington as a thriving business, government, retail, financial, hospitality, cultural, and residential center. Promote continued reinvestment in central District buildings, infrastructure, and public spaces; continued preservation and restoration of historic resources; and continued efforts to create safe, attractive, and pedestrian-friendly environments, while minimizing displacement of residents and community-focused businesses. 305.6

Policy LU-1.2.2:CEA

Continue the joint federal/District designation of a CEA within Washington, DC. The CEA shall include existing core federal facilities, such as the U.S. Capitol Building, the White House, and the Supreme Court, as well as most of the legislative, judicial, and executive administrative headquarters of the U.S. government. Additionally, the CEA shall include the greatest concentration of the District's private office development, and higher-density mixed land uses, including commercial/retail, hotel, residential, and entertainment uses...305.7

Policy LU-1.2.3: Appropriate Uses in the CEA

Ensure that land within the CEA is used in a manner which reflects the area's national importance, its historic and cultural significance, and its role as the center of the metropolitan region. Federal siting guidelines and District zoning regulations should promote the use of this area with high value land uses that enhance its image as the seat of the national government and the center of Washington, DC and that make the most efficient possible use of its transportation facilities. An improved balance in the mix of uses will help to achieve Washington, DC's aspiration for an even larger living downtown. 305.8

Policy LU-1.2.6: CEA Edges

Support the retention of residential neighborhoods adjacent to the CEA. Appropriate building setbacks, lot coverage standards, and transitions in land use intensity and building height shall be required along the edges of the CEA to protect the integrity and scale of adjacent neighborhoods and to establish a compatible relationship between new structures and the existing neighborhood fabric. 305.13

Policy LU-2.4.6: Scale and Design of New Commercial Uses

Develop new uses within commercial districts at a height, mass, scale, and design that is appropriate for a growing, densifying Washington, DC, and that is compatible with surrounding areas. 313.14

Economic Development Element

Policy ED-1.1.1: Core Industries

Continue to support and grow the District's core industries, particularly the federal government; professional, scientific and technical services; religious, grantmaking, civic professional, and similar organizations; postsecondary education; accommodation and food services; health care and social assistance; and administrative support services. 703.12

Policy ED-1.1.2: Economic Linkages

Leverage the potential of core industries to provide new employment opportunities, particularly the growth of businesses that supply essential goods and services to the government, universities, hospitals, law firms, hotels, nonprofits, and other major employers in the District. 703.13

Policy ED-1.1.6: Competitive Edge

Maintain and enhance the District's competitive edge relative to the metropolitan Washington, DC region and U.S. markets in fields such as federal government, professional services, health care, postsecondary education, media and communications, and hospitality and tourism...

Policy ED-2.1.1: Office Growth

Plan for an office sector that will continue to accommodate government agencies and growth in government contractors, legal services, international business, trade associations, and other service-sector office industries. The primary location for this growth should be in Central Washington and the adjoining office centers, including NoMa, Capitol Riverfront, Buzzard Point, St. Elizabeths, and Poplar Point. 707.6

Policy ED-2.1.3: Signature Office Buildings

Emphasize opportunities for build-to-suit/signature office buildings in order to accommodate tenants and users such as corporate headquarters that require premium office space. 707.8

Policy ED-2.1.5: Infill and Renovation

Support the continued growth of the office sector through infill and renovation within established commercial districts to more efficiently use available space while providing additional opportunities for new space. 707.10

Environmental Protection Element

Policy E-1.1.2: Urban Heat Island Mitigation

Wherever possible, reduce the urban heat island effect with cool and green roofs, expanded green space, cool pavement, tree planting, and tree protection efforts, prioritizing hotspots and those areas with the greatest number of heat-vulnerable residents. Incorporate heat island mitigation into planning for GI, tree canopy, parks, and public space initiatives. 603.6

Policy E-4.2.1: Support for Green Building

Broaden the requirements for the use of green building methods in new construction and rehabilitation projects to include all building typologies, and develop green building standards for minimum performance or continued improvement of energy use through improved operation and maintenance activities. 616.3

Urban Design Element

Policy UD-1.1.3: Preeminent View Corridors

Reinforce the prominent role of views as a defining feature of the District's character through careful planning of streetscapes and public parks to preserve and frame views of existing landmarks and significant structures and through consideration of the various types of view corridors when designing and planning public projects and streetscapes. Such views could include preeminent views of nationally symbolic architecture, important views of nationally or locally significant civic structures, landmarks, and parks and open spaces. (see Figure 9.5). 903.11

Policy UD-2.2.4: Transitions in Building Intensity *Design transitions between large- and small-scale development. The relationship between taller, more visually prominent buildings and lower, smaller buildings (such as single-family or row houses) can be made more pleasing and gradual through a variety of context-specific design strategies, such as a slender massing of taller elements, stepping back the building at floors above its neighbors' predominant roof line, stepping a building's massing down to meet the roof line of its neighbors, or strategic placement of taller elements to mark corners, vista terminations, or large open-space frontages. 909.9*

Policy UD-2.2.5: Infill Development

New construction, infill development, redevelopment, and renovations to existing buildings should respond to and complement the defining visual and spatial qualities of the surrounding neighborhood, particularly regarding building roof lines, setbacks, and landscaping. Avoid overpowering contrasts of scale and height as infill development occurs. 909.10

Policy UD-4.2.1: Scale and Massing of Large Buildings

Design the scale, height, volume, and massing of large buildings to avoid monotony and enhance the human scale. Varied roof heights, facade widths, and more expressive massing can provide variety and visual interest. Massing should be articulated with a special emphasis placed on corners, especially along important view corridors or intersections. Patterns of architectural elements, expressive structure, or other design tactics can provide variety and visual interest. 918.3

Policy UD-4.2.2: Engaging Ground Floors

Promote a high standard of storefront design and architectural detail in mixed-use buildings to enhance the pedestrian experience of the street. Promote a high degree of visual interest through syncopated storefronts that vary every 20 to 30 feet, provide direct lines of sight to interior social spaces, provide socially oriented uses along the public street, and use tactile, durable materials at the ground level. 918.4

Policy UD-4.2.4: Creating Engaging Facades

Design new buildings to respond to the surrounding neighborhood fabric by modulating facade rhythms and using complementary materials, textures, and color, as well as well-designed lighting. Varying design tactics may be used to engage a building with its surroundings. In contexts with smaller lot sizes and multiple closely spaced building entrances, breaking up a building facade in the vertical direction is encouraged, along with strongly defined and differentiated bases, centers, and tops of buildings. In areas lacking a strong building-form pattern, the use of complementary or reinterpreted materials and colors could strengthen architectural identity see Figure 9.19 for recommended facade design strategies). 918.6

Policy UD-4.2.5: Interesting Roof Lines

Design architecturally interesting roof lines to help articulate the massing of buildings and add visual appeal. Along commercial streets, tower elements at corners can help define intersections; in more residential neighborhoods, towers and penthouses can help scale and mass buildings to respond to surrounding building scale and mass. 918.8

Policy UD-4.3.3: Building Setbacks and Rooflines

Maintain uniform building setbacks and roof lines to establish a consistent pattern along avenues and priority view corridors. Setbacks should create a consistent street wall rather than have abrupt disruptions with facades that are set back or extend in front of an established pattern. The treatment of roof lines, such as recessed penthouses or variations created by bay windows and towers, should respond to the predominant character of a corridor. See Figure 9.22 for an example of building setbacks and rooflines. 919.8

Central Washington

Policy CW-1.1.1: Promoting Mixed Use Development

Expand the mix of land uses in Central Washington to attract a broader variety of activities and sustain the area as the hub of the metropolitan area. Central Washington should be strengthened as a dynamic employment center, a high-quality regional retail center, an internationally renowned cultural center, a world-class visitor and convention destination, a vibrant urban neighborhood, and the focus of the regional transportation network. New office and retail space, hotels, arts and entertainment uses, housing, and open space should be encouraged through strategic incentives and preservation so that the area remains

attractive, exciting, and economically productive. 1608.2

Policy CW-1.1.23: Architectural Excellence Promote excellence in the design of downtown buildings and landscapes. Particular attention should be focused on ground floor levels, with greater architectural details used to improve visual image. 1608.24

Policy CW-1.1.2: Central Washington Office Growth

Retain Central Washington as the premier office location in the greater Washington region. Office development should generally be guided eastward from its current area of concentration. Capitalize on the strong demand for office space in Downtown East, along North and South Capitol Streets, and in the vicinity of the NoMa-Gallaudet U Metro station. A range of office space should be planned to meet the needs of high-end, mid-range, and lowend office space users, and this space should also include modern workspace concepts such as shared workspaces, membership offices, rental conference rooms, and virtual offices. 1608.3

Policy CW-1.1.11: Reinforcing Central Washington’s Characteristic Design Features

Reinforce the physical qualities that set Central Washington apart from all other major American city centers. Balance the symbolic monumentality of the national civic center with a respectful, but distinct and impressive, expression of local life. Blend historic, traditional, and contemporary architecture to express the vitality of a diverse and growing District that is as proud of its neighborhood amenities, architectural heritage, and character as it is of its position as the seat of the national government. 1608.12

Policy CW-1.1.12: Creating Active Street Life and Public Spaces

Promote active street life throughout Central Washington through the design of buildings, streets, and public spaces. This should include: ...1608.13

Policy CW-1.1.16: Making Central Washington’s Streets More Pedestrian Friendly

Enhance Central Washington’s pedestrian network and improve pedestrian safety. This should be achieved through such measures as: ...1608.17

Policy CW-1.1.23: Architectural Excellence

Promote excellence in the design of downtown buildings and landscapes. Particular attention should be focused on ground floor levels, with greater architectural details used to improve visual image. 1608.24

Attachment 2

DOEE Development Review Comments ZC 26-05: 2100 M Street NW

The following recommendations are intended to assist the applicant in complying with District laws and incorporating strategies that will minimize the building's impact on the environment, in line with the [Sustainable DC 2.0](#) and [Clean Energy DC](#) plans. Please contact kate.tanabe@dc.gov with any questions.

LEED Certification

DOEE acknowledges that the applicant is committed to LEED v4 certification at the Gold level as indicated in the Applicant's Proposed Conditions of Approval. DOEE applauds the commitment to LEED Gold and recommends that the applicant review USGBC's registration and certification [guidance](#) regarding the sunset of LEED v4 and v4.1.

Net-zero Energy: Energy Efficiency, Electrification, and Renewable Energy

Pending legislation will likely prohibit gas for space and water heating for building permits submitted in 2027. The District will also adopt a net-zero energy building code within the next few years. According to the [DC Building Energy Performance](#) reporting, the existing building uses both electricity and fossil gas to power the building systems and appliances. DOEE strongly encourages the applicant to remove any gas-powered space and water heating systems and consider a full net-zero energy design. DOEE recommends integrating net-zero energy targets as early as possible in the design process, as it reduces costs and is easier than retrofitting an existing building.

Net-zero energy buildings are highly energy-efficient and generate enough on-site renewable energy or procures acceptable off-site renewable energy to meet or exceed the annual energy consumption of its operations. Net-zero energy buildings benefit both owners and tenants through lower operating costs, improved occupant comfort, and better indoor air quality.

DOEE also encourages the applicant to consider installing on-site renewable energy systems, such as rooftop solar panels. DOEE applauds the project's green roof areas and encourages the project to consider solar energy generation by integrating solar photovoltaic arrays into green roofs. Integrating these systems enables the project team to maximize the benefits of solar energy while also maximizing the Green Area Ratio and stormwater retention volume. DOEE has issued guidance on how to successfully incorporate solar into green roofs on pages 41 & 42 of the [2020 Stormwater Management Guidebook](#).

Many of these strategies can be financed with no upfront cost through [DC PACE](#). The [DC Green Bank](#) aims to help projects gain access to capital and financing for electrification, clean energy, and energy efficiency measures. DOEE recommends that the applicant [contact](#) the DC Green Bank to explore options. The [DC Sustainable Energy Utility](#) (DCSEU) also offers custom rebates and technical assistance. To learn about project-specific financing options, contact Crystal McDonald at cmcdonald1@dcseu.com or complete DCSEU's [Custom Rebate Form](#).

Electric Vehicle Parking

DOEE acknowledges the applicant's commitment to install 15 electric vehicle charging stations. However, this project is subject to the Green Building Act ([§ 6–1451.03a](#)), which requires new commercial buildings include electric vehicle make-ready infrastructure (such as conduit, wiring, and electrical capacity) for at least 20% of parking spaces.

According to the applicant's transportation statement, the proposed project will include 255 parking spaces. Therefore, compliance with the Green Building Act requires a minimum of 51 EV-ready parking spaces. DOEE encourages the applicant to review [available resources and incentives](#) to support EV infrastructure deployment. Additional guidance can also be found in [2017 DC Green Construction Code](#), which outlines recommended thresholds for the installation of EV supply equipment and make-ready infrastructure.

Bird-safe Building Materials

This project is subject to the [Migratory Local Wildlife Protection Act of 2022](#). Under the Act, building permits for new construction and some substantial alterations of commercial building issued after January 1, 2025 must use bird-friendly materials on building facades and exterior fenestration up to 100 feet above ground. DOEE encourages the applicant to review [DC Code § 8-2241](#) for additional details and explore the [American Bird Conservatory's Products Database](#), which rates a variety of products based on threat factor. The Act requires materials have a maximum material threat factor of 30.

Stormwater Management

DOEE acknowledges that the applicant is committed to meeting the zone's required Green Area Ratio (GAR) of 0.2. DOEE recommends that the applicant consider exceeding the minimum requirements. The stormwater management plans will be reviewed in more detail by DOEE during permitting. The applicant may contact julienne.bautista@dc.gov if they would like to meet with DOEE's stormwater team to discuss further opportunities ahead of permit submission.

Deconstruction and Reuse

DOEE encourages the applicant to consider reuse of the existing building materials wherever possible as demolition and new construction is extremely carbon intensive. Given that this project involves razing the existing structures on-site, DOEE encourages the applicant to conduct a simple life-cycle analysis (LCA) to measure and reduce the impacts from the proposed project's structural and envelope design. An LCA can inform decisions about the selection and quantity of materials used, and can assist with dematerialization (i.e., reducing the amount of a given material). Dematerialization reduces environmental harm and saves money. Past examples of LCAs in the District include [LCA for St. Elizabeth's Building 2 Commercial Office by Hickok Cole](#) and [Embodied Carbon Life Cycle Assessment Assistance for Southeast Neighborhood Library by Quinn Evans](#).

DOEE also encourages the applicant to consider deconstruction of the existing building. Destruction is the process of carefully and intentionally dismantling a building rather than demolishing it. Reusing deconstructed materials can reduce construction costs and the sale of salvaged materials can generate additional revenue. Organizations like [Community Forklift](#) collect donations of unwanted and salvaged building materials throughout the DC region.