

Government of the District of Columbia

Department of Transportation



d. Planning and Sustainability Division

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: *KB*
Kelsey Bridges
Neighborhood Planning Branch Manager

DATE: July 17, 2026

SUBJECT: ZC Case No. 26-05 – 2100 M Street NW

PROJECT SUMMARY

BXP 2100M, LLC (the “Applicant”) has requested approval of a Voluntary Design Review application to redevelop a property at 2100 M Street NW in the D-5 zone. The site currently contains an eight-story office building with underground vehicle parking. The Applicant proposes to rebuild the site with a 10-story office building comprising:

- 334,342 square feet of gross floor area;
- 8,742 square feet of ground floor retail;
- 258 on-site vehicle parking spaces;
- 10 short-term and 93 long-term bicycle parking spaces; and
- Three (3) 30-foot berths with platforms and one (1) 20-foot delivery space.

SUMMARY OF DDOT REVIEW

The District Department of Transportation (DDOT) is committed to achieving an exceptional quality of life by encouraging sustainable travel practices, safer streets, and outstanding access to goods and services. To achieve this vision, DDOT works through the zoning process to ensure that impacts from new developments are manageable within and take advantage of the District’s multi-modal transportation network and, as necessary, propose mitigations that are commensurate with the action. After an extensive review of the case materials submitted by the Applicant, DDOT finds:

- Vehicular access to the site is proposed via underground parking garage and loading area accessed from a reconstructed curb cut;
- The project proposes to meet the minimums for long- and short-term bicycle parking in Titles 11 and 18 of the *District of Columbia Municipal Regulations (DCMR)*, which DDOT supports;
- The project is exceeding the minimum vehicle parking requirement in zoning by providing 258 vehicle parking spaces for the office and retail uses, which is greater than the DDOT-preferred maximum at this location;

- The project is meeting the minimum bicycle parking requirement in zoning by providing 10 short- and 93-long term bicycle parking spaces; and
- The Applicant proposes a robust Transportation Demand Management (TDM) Plan (Attachment 1) that will support non-automobile ownership lifestyles and encourage usage of non-auto modes.

RECOMMENDATION

DDOT has no objection to the approval of this Voluntary Design Review application with the following conditions included in the Zoning Order:

- Implement the TDM Plan as proposed in the June 12, 2026, Transportation Statement ([Exhibit 8C](#)), for the life of the project; and
- Implement the following pedestrian improvements in public space:
 - Remove the midblock crosswalk on 21st Street, returning the two curb cuts to standard curb and streetscape furnishing area / tree box;
 - Install curb extensions on M Street NW at the respective intersections of 21st Street and New Hampshire Avenue. These should be “hardened” with relocated curbs, unless mutually agreed to by DDOT and the Applicant during public space permitting.

CONTINUED COORDINATION

The Applicant is expected to continue to work with DDOT on the following matters outside of the zoning process:

- The Applicant will be required to obtain public space permits for all elements of the project proposed in public space. DDOT has comments on the initial public space design which are noted later in the Streetscape and Public Realm section and can be resolved during the public space permitting process;
- The Applicant should participate in a Preliminary Design Review Meeting (PDRM) to discuss the public space design with DDOT and Office of Planning (OP);
- Coordinate with DDOT’s Planning and Sustainability Division (PSD) to ensure the long-term bicycle storage room meets both Zoning requirements and DDOT design guidelines;
- Submit a detailed curbside management and signage plan for Curbside Management Division (CMD) review, consistent with current DDOT policies. If meter installation is required, they will be at the Applicant’s expense;
- Coordinate with DDOT’s TDM Team and goDCgo on the implementation of the TDM Plan; and
- Coordinate with DDOT’s Urban Forestry Division (UFD) and the Ward 2 Arborist regarding the possibility of impacting existing street trees in public space.

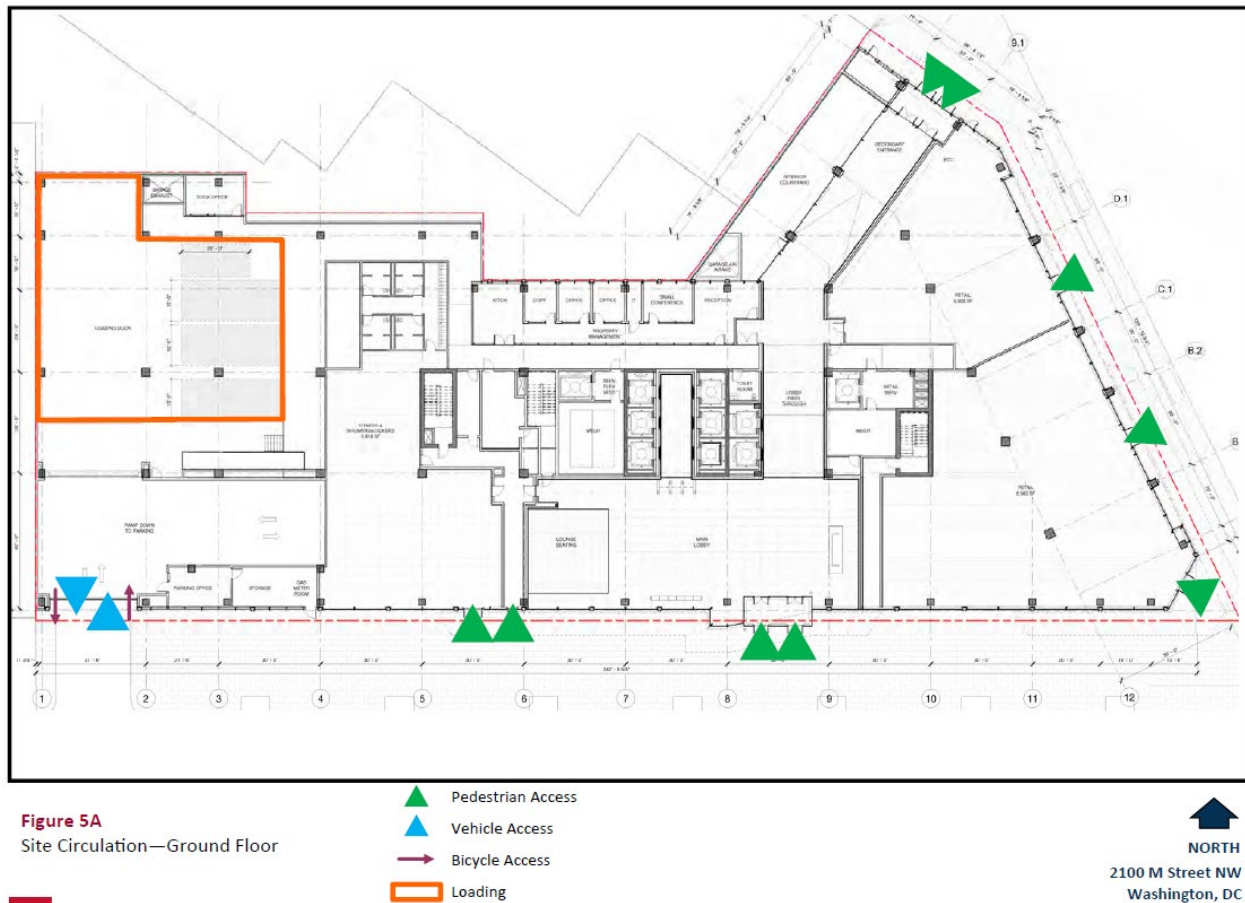
TRANSPORTATION ANALYSIS

The following is DDOT’s review of the submitted plans, application materials, and June 12, 2026 Transportation Statement ([Exhibit 8C](#)) to assess the project’s consistency with the District’s vision for an equitable and sustainable transportation system that delivers safe and convenient ways to move people, goods, and services.

Site Access

Pedestrian access to the office lobby entrance is on 21st Street with a secondary access on New Hampshire Avenue, and access to the retail is from M Street. Vehicular access to the loading area and underground parking spaces is proposed via a reconstructed curb cut on 21st Street. The project has no access to a public alley and proposes to reconstruct an existing non-compliant curb cut to meet DDOT Design and Engineering Manual standards for vehicle access. Figure 1 below shows the site layout of the proposed project.

Figure 1 | Site Plan (north arrow incorrectly pointing west, should be pointing to plan right)



Source: Wells + Associates 6/12/26 Transportation Statement, Figure 5A

Vehicle Parking

The overall parking demand created by the development is primarily a function of land use, development square footage, price, and supply of parking spaces. However, in urban areas, other factors contribute to the demand for parking, such as the availability of high-quality transit, frequency of transit service, proximity to transit, connectivity of bicycle and pedestrian facilities within the vicinity of the development, demographic composition, and other characteristics.

Although the project is located in the D-5 zone, properties west of the 20th street centerline (per Title 11 of DCMR, Subtitle I, §212.1,) have a parking requirement. The project is required by zoning to provide 87 vehicle parking spaces after taking the eligible 50% parking reduction. The project proposes a total of 258 on-site parking spaces in an underground garage, according to the breakdown of parking provided

in the June 12, 2026, Transportation Statement, somewhat less than the estimated 271 parking spaces in the existing garage.

DDOT finds the amount of vehicle parking proposed on-site to be higher than expected (almost three times more than the zoning minimum) given the project size, mix of uses, and distance from transit. Based on DDOT's preferred maximum parking rates in the 2024 *Guidance for Comprehensive Transportation Review*, 180 total spaces would be more appropriate. Providing more parking than practically needed has the potential to induce more driving. As such, DDOT recommends the Applicant make physical improvements to the adjacent pedestrian network and implement a robust TDM program to encourage walking, cycling, and transit use to and from the site rather than driving (see Pedestrian Network and TDM sections later in this report).

Bicycle Parking

The project is required by zoning to provide 93 long-term and 10 short-term bicycle parking spaces for the combined office and retail uses. The Applicant proposes 93 long- and 10 short-term bicycle parking spaces, meeting these requirements, as reflected in their TDM Plan. The bike room with long-term bike parking is shown on the Applicant's plans on the first level of the underground parking garage.

As the design of the long-term bicycle storage room moves forward, the Applicant should refer to page F-9 of Appendix F in the *Guidance for Comprehensive Transportation Review* for design best practices. The storage room must be designed so that a minimum of 50% of long-term spaces be located horizontally on the floor or bottom of a two-tier rack system, 10% of spaces be served by electrical outlets, 5% of spaces (minimum 2 spaces) be designed for larger tandem/cargo bikes (10 feet by 3 feet, rather than 6 feet by 2 feet).

Loading

DDOT's practice is to accommodate vehicle loading in a safe and efficient manner, while at the same time preserving safety across non-vehicle modes and limiting any hindrance to traffic operations. For new developments, DDOT requires that loading take place in private space and that no back-up maneuvers occur in the public realm. Access to this building for loading and unloading, delivery and trash pick-up is an important consideration, and DDOT expects the project to comply with DDOT's standards for loading.

Per Title 11 of *DCMR*, Subtitle C § 901.1, buildings with more than 200,000 square feet of office use are required to provide three (3) loading berths, three (3) loading platforms, and one (1) 20-foot delivery space. For the retail component of this project, zoning requires one (1) loading berth, one (1) loading platform, and zero (0) delivery spaces. The project proposes to meet the zoning requirements and practical needs for loading by providing a total of three (3) loading berths, three (3) loading platforms, and one (1) 20-foot delivery space, which is consistent with Title 11 of *DCMR*, Subtitle C § 901.8, which allows for the sharing of loading facilities in mixed use buildings.

The building is designed so that all loading activities take place internal to the building, accessed from a new curb cut on 21st Street NW, which is shared with the vehicular parking garage. The truck turning diagrams included in the June 12, 2026, Transportation Statement demonstrate that 30-foot trucks can enter and exit the garage with head-in and head-out movements, consistent with DDOT standards.

Trash is proposed to be stored and collected internal to the building, consistent with DDOT's standards that trash not be stored in public space or be visible from the public sidewalk.

Heritage and Special Trees

According to the District's [Tree Size Estimator map](#), the property has no Heritage and nor Special trees. DDOT expects the Applicant to coordinate with the Ward 2 Arborist regarding the preservation and protection of existing street trees, as well as the planting of new street trees, in bioretention facilities or a typical expanded tree planting space.

Streetscape and Public Realm

In line with District policy and practice, any substantial new building development or renovation is expected to rehabilitate streetscape infrastructure between the curb and the property lines. This includes curb and gutters, street trees and landscaping, streetlights, sidewalks, and other appropriate features within the public rights of way bordering the site.

The Applicant must work closely with DDOT and the OP to ensure that the design of the public realm meets current standards and will substantially upgrade the appearance and functionality of the streetscape for public users needing to access the property or circulate around it. In conjunction with Titles 11, 12A, and 24 of DCMR, DDOT's *Design and Engineering Manual (DEM)* and *Public Realm Design Manual* will serve as the main public realm references for the Applicant. Streetscape designs will be reviewed in further detail during the public space permitting process.

While the preliminary public space plans, shown above in Figure 1 are generally consistent with DDOT standards, the following considerations need to be reviewed in greater detail during the public space permitting process:

- All vehicular site access to the site, as well as loading facilities and trash pick-up, must be via the new/modified curb cut on 21st Street NW to meet DDOT standards;
- All building entrances must be at grade with the sidewalk so that no stairs or ramps will be necessary in public space;
- Replace all non-standard material in the streetscape with DDOT standard pavers;
- Remove the mid-block pedestrian crossing on 21st Street NW, returning the two curb cuts and to standard curb and streetscape furnishing area / tree box;
- Install intersection curb extensions at the crosswalks on M Street NW at both 21st Street and New Hampshire Avenue. The Applicant should attempt to harden both curb extensions by moving the physical curbs, otherwise install with striping and flex posts if one or both are infeasible, with the exact design to be determined and approved by DDOT during public space permitting;
- Submit a detailed curbside management plan with proposed signage for review and approval by DDOT Curbside Management Division (CMD). If CMD requires multi-space meters for the remainder of the frontage, they will be at the Applicant's expense;
- Provide a plan showing the detailed design of the long-term bike storage room so PSD can confirm it meets the requirements in Title 11 of DCMR, Subtitle C § 800, Title 18 of DCMR, § 1214, and DDOT *Bike Parking Guide* best practices, including larger / cargo bike spaces; and
- Any future outdoor café patios will require a public space occupancy permit.

DDOT encourages the Applicant to participate in a Preliminary Design Review Meeting (PDRM) to address design-related comments provided by DDOT and OP.

Mode Split and Trip Generation

Each trip a person makes is made by a certain means of travel, such as vehicle, bicycle, walking, and transit. The means of travel is referred to as a ‘mode’ of transportation. A variety of elements impact the mode of travel, including density of development, diversity of land use, design of the public realm, proximity to transit options, availability and cost of vehicle parking, among many others.

Mode split assumptions used in the analysis were informed by the Census. As shown in Figure 2 below, the mode splits assumed were 44% and 30% automotive for office and retail, respectively, with the remainder of trips are anticipated to be made by transit, walking, or bicycling. The retail component reflects more trips from shorter distances and mode splits were adjusted accordingly.

Figure 2 | Summary of Mode Split Assumptions

Mode	Office	Retail
Auto	44%	30%
Transit	43%	30%
Bike	3%	4%
Pedestrian	10%	36%

Source: Wells + Associates 6/12/26 Transportation Statement, Table 4

The study provided trip generation estimates based on the rates published in the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 12th Edition (Land Use Code 710 General Office). The assumed mode-split was used to convert base vehicular trips to base person trips using average auto occupancy data and then back to vehicular, transit, bicycle, and pedestrian trips. DDOT finds these methods appropriate.

The Applicant’s June 12, 2026, Transportation Statement presented anticipated peak hour trip generation for the existing combined office and retail building as well as proposed office and retail building. As shown below in Figure 3, the net change in projected person and vehicle trips did not meet DDOT’s thresholds in the 2024 *Guidance for CTR* for further analysis (100 total person trips OR 25 inbound or outbound vehicle trips during any one of study periods). As such, a CTR study with traffic impact analysis was not required.

Figure 3 | Net Change in Multi-Modal Trip Generation Summary (negative values in parentheses)

Trip Type	AM PEAK HOUR			PM PEAK HOUR			SATURDAY PEAK HOUR			AVERAGE DAILY
	IN	OUT	TOTAL	IN	OUT	TOTAL	IN	OUT	TOTAL	
Baseline Trips	38	(15)	23	(20)	27	7	(13)	(16)	(29)	(141)
Person Trips	17	(23)	(6)	(46)	16	(30)	(43)	(45)	(88)	(519)
Auto	16	(5)	11	(12)	15	3	(7)	(10)	(17)	(88)
Transit	14	(5)	9	(13)	14	1	(9)	(9)	(18)	(93)
Bike	0	(1)	(1)	(2)	0	(2)	(3)	(1)	(4)	(26)
Pedestrian	(13)	(12)	(25)	(19)	(13)	(32)	(26)	(25)	(51)	(313)
Vehicle Trips	19	(1)	18	(5)	17	12	0	0	0	16

Source: Wells + Associates 6/12/26 Transportation Statement, Table 7

Pedestrian Network

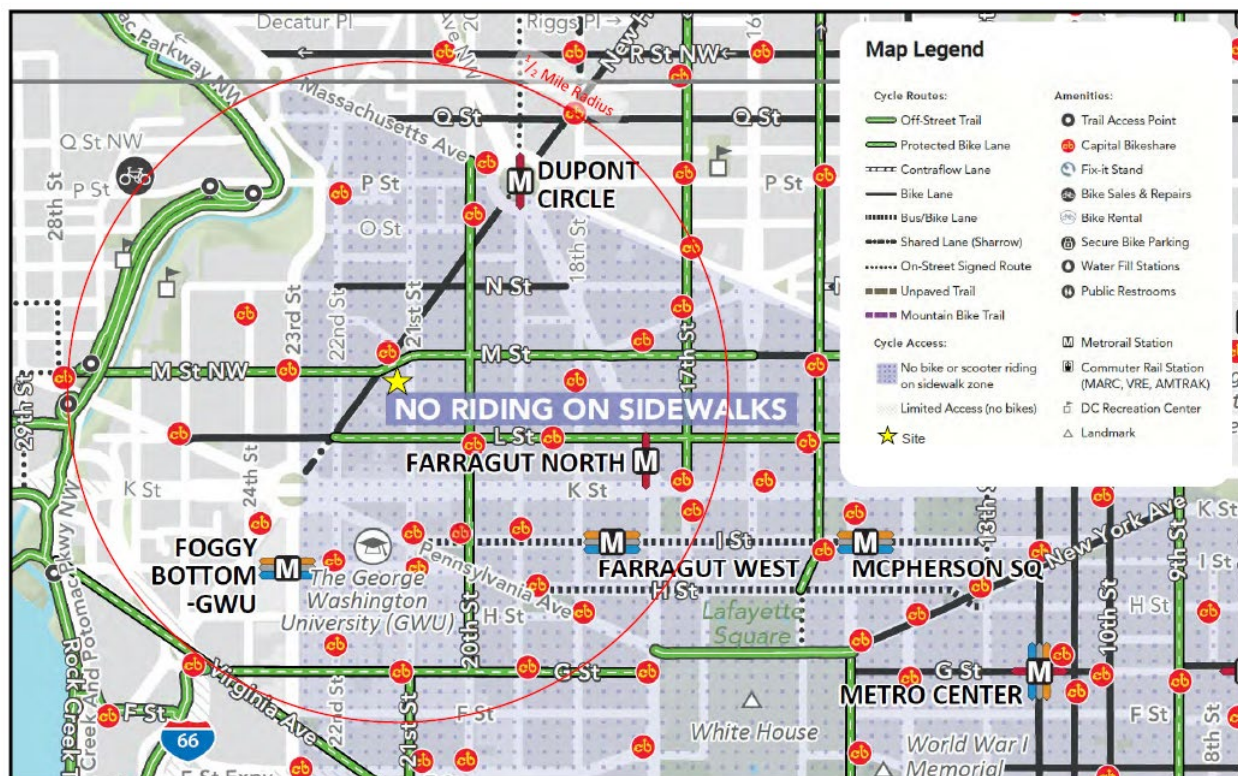
The District is committed to enhancing pedestrian accessibility by ensuring consistent investment in pedestrian infrastructure on the part of both the public and private sectors. DDOT expects new developments to serve the needs of all trips they generate, including pedestrian trips. Walking is expected to be an important mode of transportation for this development. DDOT expects the Applicant will reconstruct the public space along the frontage and upgrade any pedestrian facilities leading to transit stops and neighborhood services to current DDOT standards.

The Transportation Statement demonstrates that all nearby Metrorail stations and bus stops can be accessed on streets with wide sidewalks on both sides of the street. The Applicant is proposing pedestrian safety improvements along the site frontages; removing the mid-block marked crosswalk on 21st Street south of M Street and installing curb extensions on M Street at the intersections of 21st Street and New Hampshire Avenue. DDOT and the Applicant mutually prefer that both curb extensions to be hardened with relocated curbs but the designs will be determined during public space permitting based on construction feasibility associated with the drainage and signal pole requirements.

Bicycle Network

The District is committed to enhancing bicycle accessibility by ensuring consistent investment in bicycle infrastructure on the part of both the public and private sectors. DDOT expects new developments to serve the needs of all trips they generate, including bicycling trips. Bicycling is expected to be an important mode of transportation for this development. As shown below in Figure 4, there are currently bicycle lanes and Capital Bikeshare stations in the vicinity of the site.

Figure 4 | Existing Bicycle Facilities



Source: Wells + Associates 6/12/26 Transportation Statement, Figure 3

Transit Service

The District and Washington Metropolitan Area Transit Authority (WMATA) have partnered to provide extensive public transit service in the District of Columbia. DDOT's vision is to leverage this investment to increase the share of non-automotive travel modes so that economic development opportunities increase with minimal infrastructure investment.

The site is located within ½ mile from four Metrorail stations, served by the Orange/Blue/Silver lines (Foggy Bottom-GWU and Farragut West stations), and Red Line (Farragut North and Dupont Circle stations), respectively. The site is also within ¼ mile from the bus stops served by the A58, D74, D94, D96 Metrobus routes, with individual bus headways ranging from 20 to 30 minutes throughout the day.

Curbside Management

When a property redevelops, it is DDOT policy to reevaluate the existing curbside restrictions around the site frontages to ensure they align with the new land use(s) on the property and surrounding neighborhood context.

The site currently does not allow curbside parking along the 21st Street frontage and there is metered parking along the M Street frontage. The Applicant is not proposing any changes to curbside management at this time. DDOT is generally supportive of this concept, however, a detailed curbside and signage plan must be submitted during public space permitting for review and approval by DDOT's Curbside Management Division (CMD). At that time, the plan may be refined by CMD and the exact signage placards will be determined. If multi-space meters are required by CMD then they will be at the Applicant's expense.

Transportation Demand Management (TDM)

As part of all land development cases, DDOT requires an Applicant to develop a comprehensive TDM plan to help mitigate an action's transportation impacts. TDM is a set of strategies, programs, services, and physical elements that influence travel behavior by mode, frequency, time, route, or trip length in order to help achieve highly efficient and sustainable use of transportation facilities. In the District, this typically means implementing infrastructure or programs to maximize the use of mass transit, bicycle and pedestrian facilities, and reduce single occupancy vehicle trips during peak periods. The Applicant's proposed TDM measures play a role in achieving the desired and expected mode split.

The specific elements within the TDM plan vary depending on the land uses, site context, proximity to transit, scale of the development, and other factors. The TDM plan must help achieve the assumed trip generation rates to ensure that an action's impacts will be properly mitigated. Failure to provide a robust TDM plan could lead to unanticipated additional vehicle trips that could negatively impact the District's transportation network.

The Applicant proposed a TDM Plan in the June 12, 2026, Transportation Statement, which is included to this report as Attachment 1. DDOT finds the TDM Plan sufficiently robust to support non-automobile ownership lifestyles and encourage alternatives to auto travel.

ATTACHMENTS

- 1) Proposed TDM Plan, Wells + Associates, June 12, 2026

KB:eo



WellsandAssociates.com

2100 M

Transportation Demand Management Plan

General Strategies (apply to both office and retail components)

- The Applicant will unbundle the cost of vehicle parking from the cost to lease an office or retail unit.
- The Applicant will identify a Transportation Coordinator for the building once it has opened. The Transportation Coordinator will be responsible for coordinating with and disseminating information to each tenant in the building. The Transportation Coordinator for the building will act as a point of contact with DDOT, goDCgo, and Zoning Enforcement and will provide their contact information to goDCgo. Transportation Coordinators' job duties may be part of other duties assigned to the individual.
- The Transportation Coordinator will conduct an annual commuter survey of building employees on-site, and report TDM activities and data collection efforts to goDCgo once per year. All employer tenants must survey their employees and report back to the Transportation Coordinator.
- The Transportation Coordinator will develop, distribute, and market various transportation alternatives and options to the employees, including promoting transportation events (e.g., Bike to Work Day, National Walking Day, Car Free Day) on the property website and in internal building newsletters or communications, as applicable.
- The Transportation Coordinator will provide links to CommuterConnections.com and goDCgo.com on property websites.
- The Transportation Coordinator will receive TDM training from goDCgo to learn about the transportation conditions for this project and available options for implementing the TDM Plan.
- The Transportation Coordinator will notify goDCgo each time a new office tenant moves in and provide TDM information to each tenant when they move in.
- The Transportation Coordinator will distribute information on the Commuter Connections Guaranteed Ride Home (GRH) program, which provides commuters who regularly carpool, vanpool, bike, walk, or take transit to work with a free and reliable ride home in an emergency.
- The Transportation Coordinator will demonstrate to goDCgo that tenants with 20 or more employees are in compliance with the DC Commuter Benefits Law and the Parking Cash-Out Law.
- The Transportation Coordinator will provide employees who wish to carpool with detailed carpooling information, including other carpool matching services sponsored by the Metropolitan Washington Council of Governments (MWCOC) or other comparable service if MWCOC does not offer this in the future.
- A minimum of six preferential carpooling spaces will be designated in a convenient location within the parking garage for employee use. If the preferential carpool spaces are not fully utilized within one year after the building opens, the spaces will revert back to general use.

- A SmarTrip card and one complimentary Capital Bikeshare coupon good for a free ride will be provided to each new employee at initial lease up.
- At least 10 short-term and 93 long-term bicycle parking spaces will be provided for the office and retail components combined.
- At least six showers and 56 lockers will be provided for use by office and retail employees.
- Long-term bicycle storage rooms will accommodate non-traditional sized bikes including cargo, tandem, and kids bikes, with a minimum of five spaces designed for longer cargo/tandem bikes, and a minimum of nine spaces equipped with electrical outlets for the charging of electric bikes and scooters. There will be no fee charged to the employees for usage of the bicycle storage room.
- A minimum of 15 electric vehicle (EV) charging spaces will be provided in the garage.
- Following the issuance of a Certificate of Occupancy for the Project, the Transportation Coordinator will submit documentation summarizing compliance with the transportation and TDM conditions of the Order (including, if made available, any written confirmation from the Office of the Zoning Administrator) to the Office of Zoning for inclusion in the IZIS case record of the case. [only include this bullet if case is going through ZC or BZA; DDOT has confirmed there is no action needed by the Applicant to re-open the record since it is a condition in an Order, OZ staff can upload to IZIS administratively upon receiving the documentation]
- Five years after the issuance of the final certificate of occupancy for the Project, if the TDM Coordinator has not established a relationship with DDOT or goDCgo, the TDM Coordinator will submit a letter to the Zoning Administrator, DDOT, and goDCgo summarizing continued substantial compliance with the transportation and following TDM conditions in the Order, unless no longer applicable as confirmed by DDOT; provided, that if such letter is not submitted on a timely basis, the Applicant shall have sixty (60) days from date of notice from the Zoning Administrator, DDOT, or goDCgo to prepare and submit such letter.
- Install a Transportation Information Center Display (electronic screen) or provide comparable information by other digital or electronic means (such as an app or website), containing information related to local transportation alternatives. At a minimum the information should include nearby Metrorail stations and schedules, Metrobus stops and schedules, car-sharing locations, and nearby Capital Bikeshare locations indicating the availability of bicycles.
- Require any office tenant occupying 75 percent or more of the office space in the Project to participate in the Capital Bikeshare corporate membership program and offer discounted annual memberships to employees who do not obtain a parking space in the building;
- A bicycle repair station will be provided in each long-term bicycle parking storage room.
- Hold a transportation event for employees and members of the community once per year for a total of five years. Examples include resident social, walking tour of local transportation options, goDCgo lobby event, transportation fair, WABA Everyday Bicycling seminar, bicycle safety/information class, bicycle repair event, etc.).

Retail Strategies

- The Transportation Coordinator will post “getting here” information in a visible and prominent location on the website with a focus on non-automotive travel modes. Also, links will be provided to goDCgo.com, CommuterConnections.com, transit agencies around the metropolitan area, and instructions for customers discouraging parking on-street in Residential Permit Parking (RPP) zones.