

January 22, 2026

**Via IZIS**

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

Re: Application of Thor 3000 M Street, LLC (“Applicant”) for a Time Extension for the Consolidated PUD and Related Zoning Map Amendment Approved in ZC Order No. 22-16

Dear Chairperson Hood:

The Applicant hereby requests a one-year time extension of the Consolidated PUD and Related Zoning Map Amendment that was approved in Commission Order No. 22-16 which became effective on March 3, 2023 (the “**Approved PUD**”) for the property located at 3000 M Street, NW (the “**Property**”). The Applicant requests an extension of the Consolidated PUD approval for only one year; that is, until March 3, 2027. This extension request will provide the Applicant the opportunity to obtain sufficient construction financing to commence construction of the Approved PUD. This extension request is made pursuant to Subtitle Z, Section 705.2 of the 2016 Zoning Regulations. This is the first time extension request for the Consolidated PUD and Related Zoning Map Amendment.

**The Approved PUD and Filing of a Building Permit Application**

The Approved PUD authorized the development of a mixed-use hotel/retail building on the Property. The Approved PUD included flexibility from the vehicular parking requirements and the loading requirements of the District of Columbia Zoning Regulations. The Approved PUD also granted approval to include an eating and drinking establishment on the penthouse level of the building. The public benefits of the Approved PUD include a financial contribution of \$400,000.00 to the National Park Service to be used for improvements to the Chesapeake & Ohio Canal National Historic Towpath and \$600,000.00 to the District of Columbia’s Housing Production Trust Fund. The Applicant has also agreed to enter into a First Source Memorandum of Agreement with the Department of Employment Services with regard to the hotel-related jobs that will be generated by the Approved PUD.

Since the issuance of ZC Order No. 22-16 in March of 2023, the Applicant has spent significant economic resources on the demolition of the prior structure on the Property and the preparation of building permit plans for the Approved PUD. Demolition work occurred on the Property from March 2023 - March 2024, and the cost of the demolition construction contract was approximately \$1,000,000.

The Applicant filed a building permit application for the construction of the Approved PUD (Building Permit Application No. B2305970) with the District of Columbia Department of Buildings (“DOB”) on February 28, 2024. The filing of this building permit application before March 3, 2025, satisfied the first part of Condition No. D. 2. of ZC Order No. 22-16. The costs to date of preparing and processing the building permit application (inclusive of design costs necessary to produce the permit drawings) has been approximately \$2,000,000.

### **The Commission Should Grant the Requested Time Extension**

#### **A. Standards of Review of Time Extension Request**

The standards for a time extension are enumerated in Subtitle Z Section 705.2 of the Zoning Regulations. The Commission is authorized to extend a PUD provided that:

- (a) The extension request is served on all parties to the application by the applicant and all parties are allowed thirty (30) days to respond;
- (b) There is no substantial change in any of the material facts upon which the Commission based its original approval of the application that would undermine the Commission’s justification for approving the original application; and
- (c) The applicant demonstrates with substantial evidence one (1) or more of the following criteria:
  - (1) An inability to obtain sufficient project financing for the development, following an applicant’s diligent good faith efforts to obtain such financing, because of changes in economic and market conditions beyond the applicant’s reasonable control;
  - (2) An inability to secure all required governmental agency approvals for a development by the expiration date of the order because of delays in the governmental agency approval process that are beyond the applicant’s reasonable control; or
  - (3) The existence of pending litigation or such other condition, circumstance, or factor beyond the applicant’s reasonable control that renders the applicant unable to comply with the time limits of the order.

#### **B. Time Extension Request and Applicant’s Satisfaction of the Standards for Granting Time Extension**

This time extension request will provide the Applicant the opportunity to obtain sufficient construction financing necessary to commence construction of the Approved PUD. This is the first time extension request for Zoning Commission Order No. 22-16 and it is only for one-year.

1. Service on Parties

As noted in the attached Certificate of Service, this request is being served on ANC 2E, the only party to ZC Case No. 22-16.

2. No Substantial Change of Material Facts

There has been no substantial change in any material facts that would undermine the basis for the Commission's approval of the Consolidated PUD and Related Zoning Map Amendment in Case No. 22-16. The public benefits of the Approved PUD are still appropriate for the surrounding community and the District of Columbia, and no changes to the Comprehensive Plan have been proposed or approved since March of 2023 that impact the Property or the surrounding area.

3. An Inability to Obtain Sufficient Project Financing for the Development, Following an Applicant's Diligent Good Faith Efforts to Obtain Such Financing, Because of Changes in Economic and Market Conditions Beyond the Applicant's Reasonable Control

Similar to many other time extension applications that the Commission has reviewed and approved in the recent past, the Applicant has encountered a difficult development climate for this project. A development climate that reflects significant adverse economic and market conditions including: high interest rates; elevated construction costs; and limited access to capital.

In response to the limited sources of potential capital, the Applicant has undertaken a wide-ranging and intensive effort to identify potential equity investors and construction financing partners for what is a highly complex development in one of the most competitive urban markets. The Approved PUD's mix of high-end programming and elevated design standards requires capital groups with both the sophistication and the appetite to underwrite a best-in-class asset in a tightly constrained environment. To meet this challenge, the Applicant has engaged prospective partners not only across the United States but also throughout Europe, the Middle East, Asia, and Latin America, ensuring global visibility among institutions accustomed to underwriting multifaceted, high-profile projects. This outreach has required substantial coordination, detailed project education, and tailored materials to address differing investment criteria and regional perspectives, underscoring the depth of work invested in positioning this exceptional project for the right capital partnership.

Over the past few years, the Applicant's team has leveraged every available channel—existing relationships, global capital markets contacts, brokerage networks, and lending institutions—to source qualified interest for this project, representing a comprehensive effort across all viable avenues. As a result of this hard work, the Applicant is now close to finalizing financing for the development which will allow construction activity to commence in the second or third quarter of 2026.

**Exhibits**

Attached are the following Exhibits:

Exhibit A – Letter of Authorization from the Applicant.

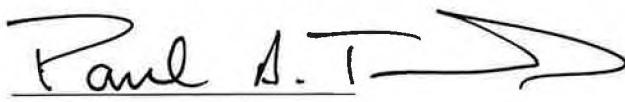
Exhibit B – Zoning Commission Order No. 22-16.

**Conclusion**

The Applicant has spent significant time and economic resources in moving the Approved PUD forward and is very close to finalizing construction financing. Based on the information provided above, the Applicant believes that it has satisfied the standards of Subtitle Z Section 705.2 and requests that the Commission grant the one-year time extension.

Please feel free to contact the undersigned if you have any questions or comments regarding this application.

Respectfully Submitted,

  
Paul A. Tummonds

**Certificate of Service**

I hereby certify that a copy of the foregoing document was sent to the following by email on January 22, 2026.

Karen Thomas  
Office of Planning  
[Karen.Thomas@dc.gov](mailto:Karen.Thomas@dc.gov)

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