

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



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

May 14, 2026

I. Introduction

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

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

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

II. Jurisdiction of the Zoning Commission

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

III. Description of the Property and the Surrounding Area

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

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

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

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

IV. Description of the Applicant

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

V. Project Description

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

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

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

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

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

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

VI. Zoning Parameters and Flexibility for the Project

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

C. The Application Satisfies the General Special Exception Requirements

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

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

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

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

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

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

VIII. Exhibits

The following exhibits are attached to this submission:

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

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

IX. Conclusion

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

Respectfully,

/s/ David M. Avitabile
David M. Avitabile

/s/ Lee S. Templin
Lee S. Templin