

2100 M Street, NW
Voluntary Design Review Application

Comprehensive Plan Evaluation

I. Introduction

As set forth below, the Project is not inconsistent with the Comprehensive Plan (“Comp Plan”).¹ The Comp Plan guides the District’s development, both broadly and in detail, through maps and policies that address the physical development of the District. 10A DCMR § 103.2. The Comp Plan also addresses social and economic issues that affect and are linked to the physical development of the city and the well-being of its citizens. The Comp Plan provides the “big picture” of how change will be managed in the years ahead and, thus, is intended to be interpreted broadly. 10A DCMR § 103.5.

Pursuant to Subtitle X § 604.5, as part of its review the Commission must find that the Project is “not inconsistent” with the Comprehensive Plan (“Comp Plan”). The Commission’s consideration of relevant Comp Plan policies must include consideration of racial equity, in compliance with the Commission’s current Racial Equity Tool. *See* Subtitle Z § 301.10(m). The Commission may need to consider and balance policy consistencies with potential policy inconsistencies and make an overall determination as to whether the Project is not inconsistent with the Comp Plan when read as a whole.

As detailed below, the Applicant has conducted a thorough evaluation of the Project’s consistency, including related requests for zoning flexibility, for consistency with the GPM, FLUM, and applicable Comp Plan policies. **Overall, the Applicant finds the Project to be not inconsistent with the Comp Plan when read as a whole, and specifically will advance numerous Comp Plan policies within the Central Washington; Land Use; Economic Development; Environmental Protection; and Urban Design Elements.**

The following sections of this statement reflect the Applicant’s thorough evaluation of the Project’s overall consistency with the Comp Plan, including when viewed through a racial equity lens. Given the wide range of overlapping policy topics addressed in the Comp Plan, certain Citywide Elements have little to no applicability to the Project. Notwithstanding, in conducting its Comp Plan evaluation the Applicant has thoroughly reviewed the goals and policies of every Comp Plan element. For those Citywide Elements that are directly applicable to the Project, a brief narrative is provided explaining the basis for the Applicant’s determination that the Project is not inconsistent with that particular element. Finally, in accordance with guidance provided by the D.C. Court of Appeals (the “Court”), the Applicant’s evaluation also included a specific assessment of whether the Project is inconsistent with any Comp Plan policies. As discussed further below, the Applicant has not identified any categorical inconsistencies between the Project and the Comp Plan. The Applicant did, however, identify one issue related to the Property’s GPM designation that could be viewed by some as being an inconsistency. While the Applicant does not view this as an inconsistency as a result of language contained within the Framework Element’s guidelines for using the FLUM and GPM, to the extent

¹ D.C. Law L23-0217 (Comprehensive Plan Amendment Act of 2017) and D.C. Law 24-0020 (Comprehensive Plan Amendment Act of 2020), including the Generalized Policy Map (“GPM”) and Future Land Use Map (“FLUM”) (D.C. Resolution R24-0292).

the Commission believes this to be an inconsistency, the Applicant submits that this inconsistency is far outweighed by the Project consistency with the FLUM and numerous Comp Plan policies.

II. Racial Equity and the Comp Plan

As part of its Comp Plan evaluation, the Commission must consider the Project through a racial equity lens. 10-A DCMR § 2501.8. Equity is a primary focus of the Comp Plan, especially in the context of creating/increasing access to opportunity. The Framework Element states that equity is both an outcome and a process, and exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. 10-A DCMR § 213.6. The Comp Plan emphasizes that considerations of equity, and particularly racial equity, must be part of a District agency’s evaluation and implementation of Comp Plan policies and actions. The Commission does this by requiring Applicant’s to utilize the Commission’s Racial Equity Tool to organize and inform their Comp Plan evaluation.

i. Evaluation of Comp Plan Policy Guidance

Per Part I (Racial Equity Analysis Submissions – Guidance Regarding the Comprehensive Plan) of the Commission’s Racial Equity Tool, the Applicant conducted a thorough evaluation of the Project’s consistency with the Comp Plan. **Overall, the Applicant finds the Application to be not inconsistent with the Comp Plan. Regarding racial equity, the Applicant finds that the Project has potential to have positive or neutral impacts / outcomes on racial equity, with the potential for positive outcomes in physical improvements to surrounding public space, increased access to economic opportunity through short- and permanent job creation.**

In accordance with guidance provided by the D.C. Court of Appeals, the Applicant was careful to identify any instances where the proposal may be viewed as being inconsistent with certain Comp Plan policies. **Upon review, the Applicant did not identify any potential inconsistencies between the proposed mixed-use (office and retail) building and relevant Comp Plan policies that would warrant a balancing against Comp Plan consistencies.**

Generalized Policy Map

As shown in **Figure 1**, the Property is designated as “Institutional” on the GPM. According to the Framework Element, the stated purpose of the GPM is to “categorize how different parts of the District may change . . . It highlights areas where more detailed policies are necessary, both within the [Comp Plan] and in follow-up plans, to manage this change.” 10-A DCMR § 225.1. The GPM should be used to guide land-use decision-making in conjunction with the Comp Plan text, the FLUM, and other Comp Plan maps. “Boundaries on the map are to be interpreted in concert with these other sources, as well as the context of each location.” 10-A DCMR § 225.2.

The GPM has four (4) main designations: Neighborhood Conservation Areas, Neighborhood Enhancement Areas, Land Use Change Area, and Commercial/Mixed Use Areas. It then includes “Other Areas,” which include parks and open space, land owned by or under the jurisdiction of the District or federal government, federal lands with federal buildings, Downtown Washington, and major institutional land uses. Regarding these areas, the Framework Element states, “[t]he fact that these areas are not designated as Conservation, Enhancement, or Land Use

Change Areas does not mean they are exempt from the [Comp Plan] or that their land uses will remain static.” 10-A DCMR § 225.22 (emphasis added).

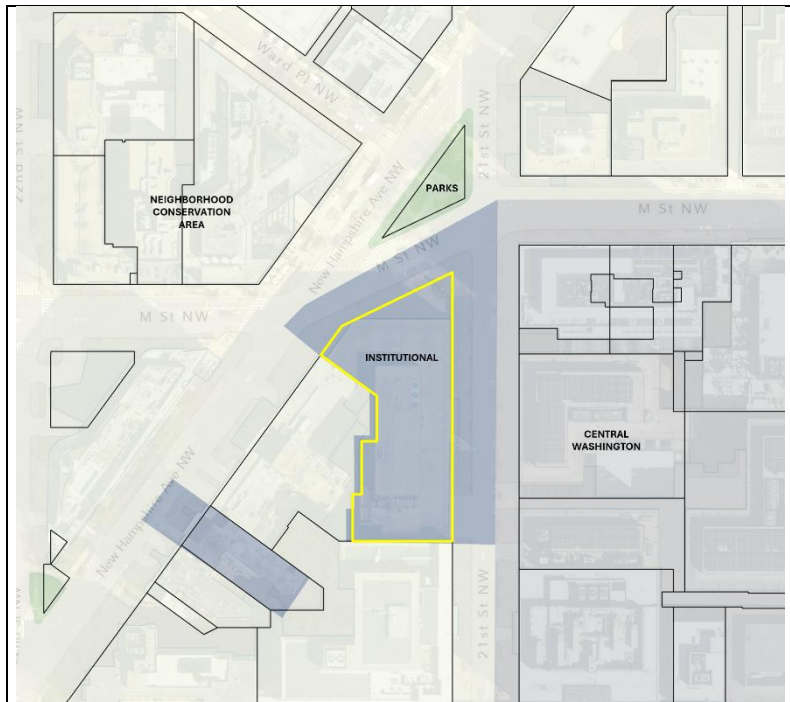
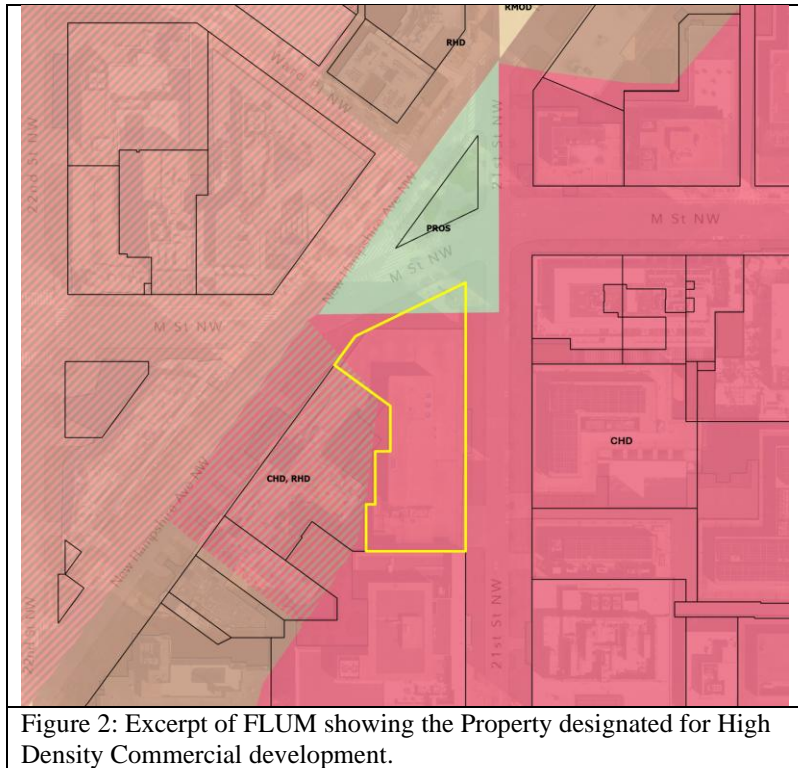


Figure 1: Excerpt of GPM showing the Property designated as Institutional.

The Applicant is not aware of the reason the Property is designated as “Institutional” on the GPM, which appears to date back to when the current form of the GPM was adopted in 2006. To the Applicant’s knowledge, the Property has never been part of a college, university, or other major institutional campus, and the existing building has been used as a typical commercial office building since its construction in 1969. It is possible that the Property’s institutional designation is a reflection of the existing building being anchored by the Urban Institute, a prominent D.C.-based nonprofit research organization and think tank founded in 1968, for 50 years until it relocated in 2019.

Notwithstanding, despite the Property’s GPM designation, the Applicant does not believe the Project is inconsistent with the GPM. As expressly acknowledged by the Framework Element, just because the Property is designated as institutional in the GPM does not mean its land use will remain static. Thus, the Comp Plan itself recognizes that the use of an area designated as Institutional on the GPM could change to something other than institutional. Further, the GPM is intended to be read in together with the FLUM which, as discussed below, depicts the Property within an area designated for high density commercial development. Based on this interpretative guidance provided by the GPM and Framework Element, the Applicant finds the Project to be not inconsistent with the GPM. However, to the extent the Commission considers there to be an inconsistency, the Applicant submits that any such inconsistency is far outweighed by the Project’s consistency with the FLUM and numerous Comp Plan policies related to land use, economic development, and urban design.

Future Land Use Map (“FLUM”)



As shown in **Figure 2**, the Property is located within an area on the FLUM that is designated for High Density Commercial development.² The Framework Element describes the High Density Commercial land use designation as defining 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 6.0 FAR are the predominant use, although high-rise residential and many lower scale buildings (including historic buildings) are interspersed. The Project is not inconsistent with this FLUM land use designation.

Area and Citywide Element Evaluation

Near Northwest / Central Washington Area Element

The Property is located on the boundary of the Near Northwest Planning Area and the Central Washington Planning Area, which runs along 21st Street. While technically located within the Near Northwest Planning Area, the Property and much of the immediate surrounding development more readily align with the policy goals and objectives set forth in the Central Washington Element. In fact, the Applicant did not identify any policies in the Near Northwest Element that apply to the Property or Project, but found several that did apply within the Central Washington Element.

Overall, the Project is not inconsistent with applicable policies within the Central Washington Element. The Project will promote a continued mix of uses and help retain Central Washington as the premier office location and dynamic employment center in the region by

² The extreme northern tip of the Property appears to extend into an area that is designated for parks, recreation, and open space (PROS). This is most certainly due to cartographic error given the large scale of the FLUM. As stated in the Framework Element, the boundaries of the FLUM do not follow parcel lines and are intended to be interpreted broadly. The boundary of the PROS area to the north of the Property should realistically follow the curve of M Street.

replacing an older vintage office building with a new, trophy-class office building that will bring new vitality to a centrally located site and prominent intersection within downtown (CW-1.1.1, CW-1.1.2). The elegance and high quality of the Project’s architectural design reinforces the visual prominence of the Property, and the physical qualities that set Washington, D.C. apart from all other cities. Specifically, the site’s location at the confluence of two important grid streets and one important avenue within the historic L’Enfant Plan directly informed the proposed design of the building (CW-1.1.23). Indeed, not only did this inform the massing and sculpting of the overall building form, but the Project’s material palette also balances the symbolic monumentality of the site’s location within the nation’s capital with a distinct and impressive expression of a local downtown (CW-1.1.11). Finally, the Project will help reenergize downtown’s public spaces and street life through its proposed ground floor design and reconstruction of adjacent public space. The ground floor of the proposed building will be highly transparent and activated with ground floor retail and amenity spaces for building tenants (CW-1.1.12). The Project will further promote active street life through the provision of main lobby entrances on both street frontages, and streetscape improvements that will make adjacent spaces feel more comfortable, attractive and safer. (CW-1.1.16).

Land Use Element

The Project is not inconsistent with applicable policies of the Land Use Element as it would advance the continued reinvestment and vitality of downtown Washington, replacing an existing, older vintage, vacant office building with a high quality, trophy-class office building that strengthens downtown’s role as the primary economic and employment center in the region while also improving the pedestrian environment through active ground-floor uses, multiple entrances, and streetscape enhancements (LU-1.2.1). The Project will deliver a high-value office and mixed-use development within the Central Employment Area (“CEA”) that makes efficient use of transportation facilities and reinforces the District’s urban character (LU-1.2.2, LU-1.2.3). The massing of the proposed building embraces the site’s unique edge conditions and provides context-sensitive transitions through carved upper-level volumes and setbacks responsive to the surrounding context (LU-1.2.6). Overall, the Project’s height, mass, and design are tailored to its commercial setting and surrounding streets, including a carefully articulated façade, enhanced public realm, and a scale intended to be compatible with the existing neighborhood fabric (LU-2.4.6).

Environmental Protection Element

The proposed Project will advance several policies contained within the Environmental Protection Element. The proposal will meet or exceed applicable Green Area Ratio (GAR) requirements and the District’s minimum stormwater retention requirements, reflecting an integrated site and landscape design approach that will help manage runoff, support green infrastructure, and improve the environmental performance of the Property. In addition, to the Project’s roof and landscape design will contain green roof areas, other landscaping, and cool roof materials that will help reduce contributions to the urban heat island effect by incorporating greener and more sustainable building and site elements (E-1.1.2, E-4.2.1).

Economic Development Element

The proposed Project will advance several policies contained within the Economic Development Element. Most notably, the proposal will support the recovery of the downtown office sector, which is one of the District most important core industries, by delivering new, high-quality office space suited to major employers that are essential to the District's economy (ED-1.1.1). The proposal also reinforces the concentration of jobs and business activity within in Central Washington, and will help maintain the District's competitive position in the region through a prominent, transit-accessible, amenity-rich workplace environment with active ground-floor uses, strong pedestrian connections, and an architecturally distinctive design (ED-1.1.2, ED-1.1.6). Finally, the Project will locate new office growth in the downtown core, one of the Comp Plan's preferred areas for office development, through infill redevelopment of an established commercial site rather than displacing that growth elsewhere (ED-2.1.1, ED-2.1.3, ED-2.1.5).

Urban Design Element

The Project is not inconsistent with the policies of the Urban Design Element. Most notably, the design responds directly to the site's unusual triangular geometry, its highly visible location at the intersection of M Street, New Hampshire Avenue, and 21st Street, and its immediate relationship to Duke Ellington Park in a way that reinforces important public views and strengthens the surrounding streetscape. The proposed design expressly recognizes the site as part of a significant moment in the L'Enfant Plan, with the building's prow-like configuration, prominent corner treatment, and orientation toward the park helping to preserve and frame views along adjoining streets and open spaces, while establishing an appropriately distinctive architectural presence at a prominent downtown location (UD-1.1.3). The proposal also will contribute to a more active and engaging pedestrian environment by replacing the current vacant building with high-quality office space sitting atop an animated ground floor with lobby and retail uses, multiple entrances, opportunities for outdoor seating, and varied frontage conditions intended to enliven the sidewalk, improve permeability between the building and the public realm, and create a more welcoming experience along each street frontage (UD-2.1.A, UD-4.2.2, UD-4.2.6). In addition, the building's massing is carefully articulated through carved volumes, upper-level setbacks, and varied roof forms that reduce visual bulk, avoid a monolithic appearance, and create a more gradual and visually appealing transition to surrounding development, while still maintaining a coherent street wall (UD-2.2.4, UD-2.2.5, UD-4.2.1, UD-4.2.5, UD-4.3.3). Finally, the façade composition is designed to complement the surrounding area through high-quality materials, strong vertical articulation, and a clearly expressed base-middle-top organization, while selective projections and enhanced corner treatments add depth and texture to the building, and help create a more comfortable, pedestrian-scaled urban form (UD-4.2.3, UD-4.2.4).

Potential Comp Plan Inconsistencies

The foregoing Comp Plan analysis thoroughly demonstrates the numerous ways in which the Project aligns with the policies and goals of the Comp Plan, including the FLUM and GPM. However, as set forth in decisions by the Court, it is not sufficient to simply identify the policies that would be advanced when evaluating a proposal for consistency with the Comp Plan. Rather, because there is intentional overlap within and between the Comp Plan elements, a Comp Plan evaluation must recognize any potential inconsistencies and explain why said inconsistencies are outweighed by other Comp Plan policies and/or competing considerations. The Implementation Element reflects similar guidance: “[r]ecognize the overlapping nature of the [Comp Plan]

elements as they are interpreted and applied. An element may be tempered by one or more of the other elements.” 10-A DCMR § 2504.6. In conducting its evaluation, the Applicant was careful to identify any instances where the Project may be viewed as being potentially inconsistent with certain Comp Plan policies.

As previously discussed, the Applicant did not identify any categorical inconsistencies between the Project and the Comp Plan. However, the Applicant did note the Property’s “Institutional” GPM designation could be view by some as being at odds with the proposed office building. The Applicant does not view this as an inconsistency due to language in the Framework Element expressly acknowledging that sites designated as Institutional on the GPM may not always be used for institutional purposes. In addition, the Property’s location within the Near Northwest Planning Area could be seen as an inconsistency. As noted above, the Project does not further policies within the Near Northwest Planning Area. However, the Property is situated on the border of the Central Washington Element and the Project furthers numerous policy goals within that area. To the extent the Commission sees either of these as inconsistencies with the Comp Plan, the Applicant submits that the inconsistencies are far outweighed by the Project’s consistency with the FLUM and numerous Comp Plan policies.

1. Racial Equity as a Process

The Framework Element states that racial equity is a process, and that as the District grows and changes, it must do so in a way that builds the capacity of vulnerable, marginalized, and low-income communities to fully and substantively participate in decision-making processes. 10-A DCMR § 213.7. As a process, a racial equity lens is employed when those most impacted by structural racism are meaningfully involved in the creation and implementation of the policies and practices that impact their lives. The Commission’s Racial Equity Tool emphasizes community outreach and engagement, which are expected to begin at the inception of any proposed zoning action. All submissions to the Commission shall be accompanied by a discussion of efforts taken by applicants to engage the community early in the zoning process. The information contained in **Table 2** addresses the questions set forth in **Part II (Community Outreach and Engagement)** of the Racial Equity Tool. As demonstrated below, the Applicant has engaged with the community, and it will continue to do so throughout the design review and development processes.

| Table 2: Community Outreach and Engagement |
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| Description of affected community (including defining characteristics). |
| The most directly affected community is the portion of the Near Northwest Planning Area that surrounds the Property, especially people who live and work within walking distance. Since the Project proposes an office redevelopment, rather than a residential redevelopment, the affected community is likely broader than just immediate abutting neighbors and could include: residents living in the West End, Dupont Circle, and Foggy Bottom neighborhoods; nearby workers and office-serving businesses that rely on daytime foot traffic; commuters and transit users who use M and 21 Streets and adjacent Metrorail/bus service; and nearby property owners and landlords whose properties may be affected by changes in rents, land values, and commercial activity. |
| Characteristics of the affected community that influenced outreach plan / efforts. |
| The area of the affected community can be generally described as a high-income, highly educated, renter-heavy urban area with strong office and service economy components. It is considered to be a high-opportunity area with strong transit access, valuable real estate, and significant |

employment concentration. The resident population is mixed, although predominately comprise of White residents, with small household sizes, relatively few children, and a sizable senior population. It contains both affluent households and more economically vulnerable subpopulations.

Community outreach timeframe / dates of major meetings and points of engagement

The Applicant introduced the Project to ANC 2A at their regularly scheduled public meeting on April 15, 2026. The Applicant also gave a special community presentation of the Project on April 27, 2026. The Applicant plans to attend the upcoming meeting for ANC 2B’s permitting committee in May.

Members of the affected community that would potentially benefit by the proposed zoning action.

Residents that live nearby will benefit from the new ground floor retail within the Project, as well as the improvements to adjacent public space that will be constructed as part of the Project. Workers and visitors to the area will similarly benefit from the presence of additional ground floor retail uses.

Members of the affected community that would potentially be burdened by the proposed zoning action.

Residents, workers, and visitors may temporarily be burdened by the Project during construction due to noise, dust, and pedestrian and vehicular constraints around the site. No long-term or permanent burdens are anticipated.

Potential positive outcomes of the proposed zoning action identified by the affected community.

At the community meeting held on April 27, 2026, members of the affected community noted the potential benefits of the Project, bringing new office workers and visitors to the area to support existing retail and activate the long-underutilized corner property. The community noted that the law firm tenant, Sidley, would likely attract many visitors that would required lodging in the nearby hotels. The community anticipates that the Project will have positive economic impacts on the District.

Potential negative outcomes of the proposed zoning action identified by the affected community.

The community noted potential impacts to light and air on the nearby Yours Truly hotel to the west of the Property. The Applicant has been in communication with the owners of the hotel.

Changes / modifications made to the proposed zoning action that incorporate / respond to input received from the affected community.

No feedback has been received from the affected community to date that required changes or modifications to the Project.

Input received from the affected community not incorporated into the proposed zoning action.

No feedback has been received from the affected community to date that required changes or modifications to the Project.

Efforts taken to mitigate potential negative outcomes identified by the affected community.

No mitigation efforts have been required to date.

2. Racial Equity as an Outcome

As an outcome, racial equity is achieved when race no longer determines one’s

socioeconomic outcomes, and when everyone has what they need to thrive no matter where they live or their socioeconomic status. 10-A DCMR § 213.9. **Table 3** considers the Project relative to any anticipated positive and negative impacts and/or outcomes to racial equity. Upon consideration, any impacts / outcomes resulting from the Project are likely to be positive or neutral as they relate to racial equity, with the potential for positive outcomes in physical improvements and access to economic opportunity.

| Table 3: Evaluation of Zoning Action Through a Racial Equity Lens | |
|--|---|
| Direct Displacement | The Project will not cause direct residential displacement as the site does not contain any residential use. The Property is currently improved with a vacant/underutilized office building. The existing building will be razed, and the subject property will be redeveloped with the Project. |
| Indirect Displacement (Economic and Cultural) | <p>The Project will not lead to indirect economic or cultural displacement within the immediate area.</p> <p>Indirect displacement occurs when new uses significantly alter neighborhood dynamics or raise property values and rents, resulting in long-standing residents or businesses having to move out or close down. In this case, the Project is located within the downtown core of the District, and largely surrounded by office, institutional, lodging, and high-end multi-family residential buildings. The area surrounding the Project is fully built out and characterized with some of the highest property values in the city. Based on these factors, the Project is unlikely to trigger the type and amount of growth in the area that has the potential to increase property values and cause indirect displacement of existing residents in the immediate area. Additionally, the Project will not cause cultural displacement as it is not located in an area that is characterized by residents with a long-established neighborhood history that is at risk of being pushed out.</p> |
| Housing | The Project will not cause any direct changes or have any direct impact on housing. |
| Physical | The Project will result in positive changes to public space, streetscape, infrastructure, and the environment. As part of the project, the adjacent public space and streetscape will be reconstructed to DDOT standards, including sidewalks, tree boxes, bike racks, and other street furnishings. |
| Access to Opportunity | The Project is expected to have neutral outcomes related to access to opportunity. |
| Community | The Project is expected to have neutral outcomes overall as related to the Affected Community. The Property has been used for commercial office purposes since 1970, when the existing building was constructed. The Project will replace the existing, outdated office building with a new, high-quality office building. Given its location in the West End of downtown and on the edge |

of the Central Employment Area, the proposed revitalization of the Property for continued office use is appropriate, and not likely to cause displacement of existing residents (owner and renter) due to increased residential property values.