

**APPLICATION ON BEHALF OF WELLS REIT II 80 M STREET LLC FOR REVIEW
OF BUILDINGS AND STRUCTURES ON M STREET AND SOUTH CAPITOL
STREET SE IN SQUARE 699 (LOT 28)**

DESIGN REVIEW FOR 80 M STREET SE

I. Introduction

This application is submitted on behalf of Wells REIT II 80 M Street LLC (the “**Applicant**”) for Zoning Commission review and approval of the proposed renovation of and addition to the existing building located at 80 M Street SE (Square 699, Lot 28) (the “**Property**”). The Property is comprised of approximately 45,117 square feet (or 1.03 acres) of land area and is located in the D-5 Zone District.

The Applicant submits this application pursuant to Subtitle I §§ 616.6 and 616.8 of the District of Columbia Zoning Regulations, which requires Zoning Commission review of all proposed exterior renovations to any existing buildings that would result in an alteration of the exterior designs facing street segments in the M and South Capitol Streets Sub-Area.

The Property is improved with an existing seven (7)-story office building, and the Applicant proposes to renovate the building and construct a two-story addition with a habitable penthouse (the “**Project**”). The renovated office building will complement the other development and uses in the area, which includes a mix of offices, hotels, multifamily residential buildings, and Nationals Park, which is one block south of the Property. The renovated office building will continue to provide daytime activity in the Navy Yard neighborhood.

II. Jurisdiction of the Zoning Commission

The Zoning Commission has jurisdiction to grant approval of the proposed development pursuant to Subtitle I §§ 616.6, 616.8, and 701.1 of the Zoning Regulations.

III. M and South Capitol Streets Sub-Area

The objectives of the M and South Capitol Streets Sub-Area are to ensure the preservation of this historically important axial view of the Capitol Dome and further the development of a high-density mixed-use corridor north of the Capitol Gateway neighborhood. 11 DCMR Subtitle I § 616.1.

IV. Description of Property and Surrounding Area

The Property consists of approximately 45,117 square feet of land area and comprises half of the block between Half and First Streets along M Street. The Property is bound by M Street SE to the south, 1st Street SE to the east, L Street SE to the north, and Cushing Place SE to the west. The Property is located one block north of Nationals Park and one block west of the Navy Yard-Ballparking Metrorail Station. Pictures of the Property and the surrounding area are included in Exhibit E.

The surrounding area consists primarily of a mix of high density uses, including office buildings, hotels, and multifamily residential buildings, all with a variety of ground floor retail, service, and eating and drinking establishment uses. The vicinity includes areas zoned D-5, CG, SEFC-1A, and MU-10, with areas zoned RA-2 further east and areas zoned RF-1 further southwest of the Property.

V. Description of the Project

The Applicant proposes to renovate the existing seven (7)-story office building and construct a two (2)-story addition with a habitable penthouse. The existing building consists of approximately 292,100 square feet of gross floor area (“GFA”). The Project will add approximately 87,506 square feet of GFA, for a total of approximately 378,266 square feet of GFA, and will include a habitable penthouse with approximately 24,516 square feet of gross square feet.¹

The building is currently 89 feet, nine (9) inches in height, and the proposed addition will result in the building having a height of 124 feet, 11 inches, within the maximum 130 feet permitted in the zone.² The proposed addition will be devoted to office use, with a portion of the penthouse also being devoted to shared amenity space for the office tenants.

The Project will create a vertical addition consisting primarily of new glass curtainwall with metal trim on all facades, as shown on the architectural plans (“Plans”) attached as Exhibit E. The vertical expansion will have metal panel and terracotta accents that will complement the glass façade and will include a new canopy of roof structures consisting of metal panel and wood soffit and supported by “Y”-shaped steel columns. The Project will maintain the existing curtainwall glass façade at the south portion of the building and the existing brick facades along the east, west, and north sides of the building. The columns at the ground level will receive new metal panel column covers with accents, and a new metal panel apron will highlight a new wood soffit at the existing recessed entry. The proposed wood soffit will have a three-dimensional gradient design that mimics the geographical convergence of the Potomac and Anacostia Rivers, adding an artful form to the building’s public presence that is compelling from both a visual and conceptual level and creatively expresses the unique perch the District occupies at the nexus of these two channels. The building entry will be relocated one column bay to the east in order to better highlight the corner and coordinate with the new wood soffit feature. Interior work will include updates to the lobby and expansion of the existing fitness center on the ground floor. The Project will include a lighting plan to ensure that the proposed renovations and addition do not result in any adverse impact on nearby residences, as well as a signage plan.

A prominent feature of the Project will be the use of mass timber for construction of the proposed addition. In addition to the environmental benefits associated with mass timber construction, which is capable of achieving a total carbon footprint equal to only one-third of similarly sized steel and concrete buildings, the integration of timber for structural and design components of the Project will deliver a new level of definition to the development and to the surrounding area. This concept will not only be realized in the internal support systems and interior design of the upper-story addition, but will also be communicated at the street level by way of the wood soffit feature noted above, as well as reiterated in the soffits proposed for the 8th floor and penthouse terraces. These features, along with the other aspects of the design

¹ The proposed GFA includes approximately 4,458 square feet (or approximately 0.1 FAR) of penthouse habitable space that exceeds the maximum 0.4 FAR of habitable space excludible from FAR under Subtitle C § 1501.3(c). The above-referenced total of 24,516 square feet of habitable penthouse space includes the space that counts towards the building’s FAR.

² A maximum height of 130 feet is permitted in the D-5 zone for properties fronting a street right-of-way with a width of 110 feet or greater. 11 DCMR Subtitle I § 540.1.

discussed above, will strengthen the building's presence at the corner of M and First Streets and bring a new dynamic design to the streetscape.

The Applicant has engaged with Advisory Neighborhood Commission ("ANC") 6D regarding the Project and, per the ANC's request, attended an administrative meeting with the ANC on October 15, 2019, and presented to the full ANC at its public meeting on October 21, 2019.

VI. Zoning Parameters of the Project

The Project will have a floor area ratio ("FAR") of 8.38 and a maximum building height of 124 feet, 11 inches and will provide approximately 287 vehicular parking spaces and approximately 43 long-term bicycle parking spaces and six (6) short-term bicycle parking spaces, as required. More detailed zoning tabulations are included in Exhibit E.

VII. The Applicant Satisfies the Burden of Proof for Zoning Commission Review of Alteration of the Exterior Designs Facing Street Segments in the M and South Capitol Streets Sub-Area

Pursuant to Subtitle I § 701.2 of the Zoning Regulations, the Applicant must demonstrate that the application satisfies the specifically delineated requirements of the M and South Capitol Streets Sub-Area. The Applicant must also satisfy the Design Review requirements set forth in Subtitle X, Section 604.³

A. The Applicant Satisfies the Standards with Regard to Zoning Commission Review Under the Design Review Regulations for the M and South Capitol Streets Sub-Area

The Applicant satisfies M and South Capitol Streets Sub-Area Design Review standards as follows.

1. The Project will help achieve the objectives of the sub-area, as set forth in Subtitle I, Chapter 6 (11 DCMR Subtitle I § 701.2(a)(1)).

The Project will achieve the objectives of the M and South Capitol Streets Sub-Area that are set forth above and outlined in Subtitle I § 616.1. The Property, located between Half and First Streets SE, does not abut any of the axial thoroughfares running from the Capitol, such as South Capitol Street or New Jersey Avenue, and thus the Project will have no impact on the axial views of the Capitol Dome. In addition, the Project will further the development of a high-density mixed-use corridor north of the Capitol Gateway neighborhood by updating the existing building and strengthening the stock of commercial office buildings in the area, which will help to continue generating an appropriate level of daytime activity in the neighborhood.

2. The Project will be in context with the surrounding neighborhood and street patterns (11 DCMR Subtitle I § 701.2(a)(2)).

³ Pursuant to Subtitle I § 102.3, the Project will not exceed 100% of the assessed value of the building and thus building is not subject to the Downtown use and design requirements of Subtitle I §§ 601 and 602.

The Project is consistent with the other development and uses in the surrounding area, which consist primarily of a mix of high-density office buildings, hotels, and multifamily residential buildings, as well as National Park, one block south of the Property. The surrounding buildings are generally 10-12 stories in height and, like the existing building on the Property, focus pedestrian entrances along M and First Streets, with service access more frequently accommodated along L Street.

3. The Project will minimize conflict between vehicles and pedestrians (11 DCMR Subtitle I § 701.2(a)(3)).

The Project will maintain the existing vehicular access to the building off of L Street. This removes loading facilities and the garage entrance from the primary designated segment of M Street, minimizing any potential conflicts with pedestrian traffic, which is largely concentrated on M Street.

4. The Project will minimize unarticulated blank walls adjacent to public spaces through façade articulation (11 DCMR Subtitle I § 701.2(a)(4)).

The elevations and renderings included in Exhibit E depict the proposed building facades, which are highly articulated and defined and incorporate high-quality building materials. As outlined above, the proposed vertical addition will consist of glass curtainwall with metal trim on all facades and metal panel and terracotta accents to complement the glass façade. The Project will maintain the existing well-articulated curtainwall glass façade at the south portion of the building and the existing brick facades along the east, west, and north sides of the building. The columns at the ground level will receive new metal panel column covers with accents, and a new metal panel apron will highlight a new wood soffit at the existing recessed entry. The design will elevate the building's street presence by strengthening focus at the corner of M and First Streets and incorporating the fine definition of the wood soffit features, which punctuate the corner at both the ground-level entrance and the upper-story terrace element. The building expression will be conveyed through the interplay of the two stacked natural wood corner canopies, with the steel of the Y-shaped supports and columns accenting the main entrance and the full length of the vertical expansion.

5. The proposed building will minimize impact on the environment, as demonstrated through the provision of an evaluation of the proposal against LEED certification standards (11 DCMR Subtitle I § 701.2(a)(5)).

The Project is pursuing LEED certification for new construction. Some of the key “green” features being pursued include low flow plumbing fixtures, green roof, the above-referenced mass timber structure, a VRF mechanical system, and energy efficient destination dispatch elevators. These features will minimize the impact of the Project on the environment and will further the District’s environmental and sustainability policy objectives.

B. The Applicant Satisfies the Standards with Regard to Zoning Commission Design Review Under the Design Review Regulations

The Applicant satisfies the general Design Review standards as follows.

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

The purposes of the Comprehensive Plan are to a) define the requirements and aspirations of District residents, and accordingly influence social, economic and physical development; b) guide executive and legislative decisions and matters affecting the District and its citizens; c) promote economic growth in jobs for District residents; d) guide private and public development in order to achieve District and community goals; e) maintain and enhance the natural and architectural assets of the District; and f) assist in conservation, stabilization and improvement of each neighborhood and community in the District (DC Code Section 1-245(b)).

The Project advances these purposes by furthering the social and economic development of the District and adding to the stock of commercial office space to serve the mix of uses in Navy Yard and help to maintain a high level of daytime activity in the area. Specifically, the Project will position the building to serve a new single tenant, thereby directly serving to promote the city's economic development. The development will also enhance the streetscape and create a pedestrian-friendly experience, utilizing a new, construction method — mass timber construction — that offers potential environmental benefits and a reduced carbon footprint.

a. Land Use Map

The Future Land Use Map ("FLUM") designates the Property as appropriate for high density commercial uses. The proposed development, with an overall FAR of 8.38 and a height of 124 feet, 11 inches is consistent with this designation. The office provides a daytime presence in the community and complements the existing uses in the neighborhood.

b. Land Use Element

The Project is consistent with the following policies contained in the Land Use Element:

Policy LU-1.1.3: Central Employment Area: . . . the CEA shall include the greatest concentration of the city's private office development, and higher density mixed land uses, including commercial/retail, hotel, residential, and entertainment uses. Given federally-imposed height limits, the scarcity of vacant land in the core of the city, and the importance of protecting historic resources, the CEA may include additional land necessary to support economic growth and federal expansion. The CEA may be used to guide the District's economic development initiatives, and may be incorporated in its planning and building standards (for example, parking requirements) to reinforce urban character. The CEA is also important because it is part of the "point system" used by the General Services Administration to establish federal leases. The boundaries of the CEA are shown in Figure 3.2.

Policy LU-1.1.4: Appropriate Uses in the CEA: Ensure that land within the Central Employment Area 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 the District of Columbia, and that make the most efficient possible use of its transportation facilities.

Policy LU-1.1.5: Urban Mixed Use Neighborhoods: Encourage new central city mixed use neighborhoods combining high-density residential, office, retail, cultural, and open space uses in the following areas:

- Mount Vernon Triangle
- North of Massachusetts Avenue (NoMA)
- Downtown East
- South Capitol Street corridor/Stadium area
- Near Southeast/Navy Yard

The location of these areas is shown in the Central Washington and Lower Anacostia Waterfront/Near Southwest Area Elements. Land use regulations and design standards for these areas should ensure that they are developed as attractive pedestrian-oriented neighborhoods, with high-quality architecture and public spaces. Housing, including affordable housing, is particularly encouraged and should be a vital component of the future land use mix.

Policy LU-1.3.1: Station Areas as Neighborhood Centers: Encourage the development of Metro stations as anchors for economic and civic development in locations that currently lack adequate neighborhood shopping opportunities and employment. The establishment and growth of mixed use centers at Metrorail stations should be supported as a way to reduce automobile congestion, improve air quality, increase jobs, provide a range of retail goods and services, reduce reliance on the automobile, enhance neighborhood stability, create a stronger sense of place, provide civic gathering places, and capitalize on the development and public transportation opportunities which the stations provide. This policy should not be interpreted to outweigh other land use policies which call for neighborhood conservation. Each Metro station area is unique and must be treated as such in planning and development decisions. The Future Land Use Map expresses the desired intensity and mix of uses around each station, and the Area Elements (and in some cases Small Area Plans) provide more detailed direction for each station area

The Project will contribute to the burgeoning high-density mixed-use neighborhood in Navy Yard, which is within the Central Employment Area, and will the existing office building, as renovated and expanded, will continue to contribute to the daytime activity in the area. This will help the area development to capitalize on the Navy Yard-Ballpark Metrorail Station, to introduce pedestrian traffic, and to accommodate ease of transportation to the employees working in the building. Moreover, the Project will introduce new office space into the Central Employment area and transform the existing office building into a more dynamic building contributing the streetscape and design character of the neighborhood.

c. Urban Design Element

The Project furthers several of the goals of the urban design element:

Policy UD-2.2.5: Creating Attractive Facades: Create visual interest through well-designed building facades, storefront windows, and attractive signage and lighting. Avoid monolithic or box-like building forms, or long blank walls which detract from the human quality of the street.

The proposed renovation and vertical addition to the building will contribute to and complement the existing urban fabric in the surrounding area. In addition to the glass curtainwall of the addition and proposed accents, the new features and revised building entrance, which is being shifted eastward to better emphasize the corner, will provide an attractive design that will enhance the area. As discussed above, the unique wood soffit designs at the ground level and upper-story terrace and the steel Y-shaped supports and column motif will create visual interest and elevate the building's public presence.

d. Economic Development Element

The Project is consistent with the 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 and technical services, membership associations, education, hospitality, health care, and administrative support services.

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, non-profits, and other major employers in the city.

Policy ED-2.1.1: Office Growth: Plan for an office sector that will continue to accommodate growth in government, 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 in the emerging office centers along South Capitol Street and the Anacostia Waterfront.

Policy ED-2.1.4: Diversified Office Options: Diversify the tenant base by attracting both high-end, mid-range, and low-end office space users, and by supporting a range of office space types. Recognize that while many firms seek to be located in the District, some may prefer lower end space over premium Downtown office space.

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.

Policy ED-3.1.1: Neighborhood Commercial Vitality: Promote the vitality and diversity of Washington's neighborhood commercial areas by retaining existing businesses, attracting new businesses, and improving the mix of goods and services available to residents.

The Project will renovate and expand the existing office building on the site, building on the growth of the Navy Yard neighborhood and increasing the supply of commercial office space available in the area. By doing so, the Project will strengthen the area as a commercial center and increase daytime activity in the neighborhood. The Project will be designed to potentially accommodate a new single tenant, furthering the District's economic development goals.

e. Area Element

The Comprehensive Plan also contains ten area elements. The Property is located in the "Lower Anacostia Waterfront and Near Southwest" Area Element. The Project is consistent with the following goals of the Area Element:

Policy AW-1.1.3: Waterfront Area Commercial Development: Encourage commercial development in the Waterfront Area in a manner that is consistent with the Future Land Use Map. Such development should bring more retail services and choices to the Anacostia Waterfront as well as space for government and private sector activities, such as offices and hotels. Commercial development should be focused along key corridors, particularly along Maine Avenue and M Street Southeast, along South Capitol Street; and near the Waterfront/SEU and Navy Yard metrorail stations. Maritime activities such as cruise ship operations should be maintained and supported as the waterfront redevelops.

Policy AW-2.3.4: M Street Southeast; Transform M Street into an attractive pedestrian-oriented thoroughfare, lined with retail shops and services, with upper story office, hotels, and residential uses. The street itself should be designed as a multi-modal boulevard, accommodating pedestrians, bicycles, and transit vehicles as well as cars. It should strengthen connections between the Near Southeast, Southwest, and Capitol Hill.

The Project will promote M Street SE, and the broader Navy Yard and Waterfront area more generally, as a primary commercial corridor. The Project will provide newly renovated and additional office space, increasing the office supply in the area and contributing to the high-density, mix of uses in the immediate vicinity. The newly-renovated building will add achieve a compelling design that contributes to the overall architectural quality in the area and further defines the character of this burgeoning neighborhood.

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 DCMR Subtitle X § 604.7(a))**

The Project will contribute to the streetscape and pedestrian environment shifting the building entrance slightly east to reemphasize the corner at M and First Streets and strengthen the building's presence at this intersection. Further, the addition will create an attractive building with a compelling design and mix of materials to enliven the block and improve the pedestrian

experience at this location. As discussed in detail above, the corner emphasis in the design, driven by the rejuvenation of the main building entrance and the 8th story terrace, will better animate the streetscape with the wood soffit features and steel Y-shape supports and columns. The Project will maintain the existing vehicular circulation, with access on L Street, which maintains the greatest deference to the pedestrian traffic on M Street, which is the clear axion with the Metrorail station.

- 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 DCMR Subtitle § 604.7(b))**

While the Project is not proposed to include any public space, the existing building entrance at the corner of M and First Streets will continue to provide an inviting and newly-enlivened open seating area for those in the area to meet and converse. In addition, the Project will provide dynamic gathering space in conjunction with ground-level public space with the introduction of the upper-story plane of the 8th-story corner terrace. Further, the Project integrates well with the existing public spaces in the surrounding neighborhood, providing an office location with close proximity to the Canal Park system to the east along Second Street, as well as the Yards park along the waterfront further south of the Property.

- 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 DCMR Subtitle X § 604.7(c))**

The Project respects the historic character of the Navy Yard neighborhood. The proposed design creates a welcoming presence along M Street and contributes to the character of the intersection at M and First Streets. The Project will visually enhance the surrounding area and complement the existing commercial and residential development in the immediate vicinity.

- 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 DCMR Subtitle X § 604.7(d))**

As discussed in detail above and shown in the Plans at Exhibit E, the Project will include high quality materials, including accents to improve upon the existing building, and will strengthen the building's street presence and relationship to the pedestrian environment by highlighting the corner. As discussed above, the wood soffit and Y-shaped steel features at the ground level entrance and 8th story terrace will emphasize the corner and create visual interest

along the pedestrian streetscape. The textural contrast between the timber and steel features and the artful expression of the wood soffits will constitute a subtle but compelling design concept that helps to elevate this portion of M Street.

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

As discussed above, the Project will be LEED certified and will include green roof features as shown in the plans attached as Exhibit E. This, along the Applicant's other sustainable building features outlined above, will ensure that the Project mitigates environmental impacts and furthers the city's sustainability goals.

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 DCMR Subtitle X § 604.7(f))

The Project facilitates connectivity by increasing the stock of available office space one block west of a Metrorail station, as well as providing bicycle facilities and improving the pedestrian experience in the neighborhood by enhancing the existing façade. In addition, the proposed renovations will include the addition of a bicycle room on the P1 level, which will include 43 long term spaces, and expansion of the existing shower facilities on the ground floor, increasing the number of showers from two (2) per locker room to four (4) per locker room.

C. The Applicant Satisfies the Special Exception Requirements with Regarding to Zoning Commission Review

Pursuant to 11-X DCMR Sections 604.6 and 701.2(a), the Zoning Commission must find the Project meets the general special exception requirements of the Zoning Regulations. The Applicant meets these requirements as follows.

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

There is a two-pronged test to justify the request for special exception relief. An applicant must demonstrate that the project is in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps and that it will not affect adversely the use of neighboring property in accordance with the Zoning Regulations and Zoning Map. As made clear in the above discussions, the Project is consistent with the Zoning Regulations, the Zoning Map applicable to the Property, and the Comprehensive Plan. The Project height and density is consistent with that envisioned for the D-5 zone, and the Project will introduce an attractive and interesting design to the area that strengthens the building's corner presence and contributes to

the pedestrian streetscape. The Project will also create more office space in the Central Employment Area and enable the building to accommodate a new single tenant in furtherance of the District's economic development goals.

2. The Proposed Building Will Not Affect Adversely the Use of Neighboring Property in Accordance with the Zoning Regulations and Zoning Map

The Project is in keeping with the scale of density and height of the surrounding buildings, which consist largely of 10-12 story commercial and residential buildings, and fits appropriately into that context. It renovates and expands an existing office use, which will complement the mix of uses in Navy Yard and continue to generate daytime commercial activity in the area. The Applicant has thoughtfully designed its building to minimize any impacts on adjacent properties and it will maintain the current site circulation that serves to mitigate any transportation impacts associated with the building. Specifically, vehicular access will continue to be accommodated on L Street in order to minimize conflicts with pedestrian traffic focused along M Street adjacent to the Metrorail station. Lastly, as discussed above, the Project will add a new bicycle room to the existing building and increase the number of showers in the ground-floor locker rooms. For all of these reasons, the Project will be a positive contribution to the surrounding area.

VIII. Exhibits

The following exhibits are attached to this submission:

Exhibit A: Application Form

Exhibit B: Agent Authorization Letter

Exhibit C: Property Owner List

Exhibit D: Certificate of Notice

Exhibit E: Architectural Plans/Sections/Elevations, Photographs of the Property, and Surveyor's Plat

IX. Conclusion

For the foregoing reasons, the Applicant asks that the Commission approve this development per the D Zone District and M and South Capitol Streets Sub-Area requirements. We look forward to presenting this application to the Commission at the public hearing on this matter.

Respectfully,

/s/ Allison C. Prince
Allison C. Prince

/s/ Christine A. Roddy
Christine A. Roddy

/s/ Lawrence Ferris
Lawrence Ferris