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FILE NO: 99999.000309

January 26, 2004

By Hand Delivery

Zoning Commission
c/o Ms. Carol Mitten, Chair
441-4th Street, N.W.
Room 210
Washington, D.C. 20001

Re: Representation of Watergate West, Inc. in ZC Case No. 03-16, (PUD Modification – Watergate Hotel)

Dear Ms. Mitten and Fellow Commission Members:

Please be advised that Richard L. Aguglia of Hunton & Williams will be representing Watergate West, Inc. in opposition to the applicant's request for approval of a modification to the planned unit development at the Watergate complex. I was authorized to represent Watergate West, Inc. in writing on January 22, 2004.

As more specifically stated by Stephen Gell, Esq. in his correspondence to the Commission dated January 15, 2004, Watergate West, Inc. is seeking party status as the owner of a cooperative residence in the Watergate complex next to the Watergate Hotel and is directly affected by the application.

Watergate West, Inc. plans to call as expert planners Fred Greene and Alvin McNeal. I will send their planning report by hand delivery to the Commission and by hand delivery or fax to the applicant and all other parties as soon as possible before the hearing scheduled for Thursday, evening, January 29, 2004.

Watergate West, Inc. also intends to have a designated representative or representatives from its Board and/or residents in Watergate West speak in opposition to the application. By way of summary, the testimony of the planning experts, board members and residents of Watergate West is expected to be along the following lines;

1. The application is an attack on the integrity of the hotel amenity package in the PUD approved for the Watergate complex.

ZONING COMMISSION
District of Columbia
CASE NO.03-16
EXHIBIT NO.38

2. Approval of the application will set a bad precedent for changes to other amenity packages in existing PUD projects, to the detriment of the residents who have relied upon the amenity in purchasing housing in the PUD.

3. There is no shortage of residential properties in the Foggy Bottom, West End to justify the conversion of the hotel units to residential units.

4. The applicant has failed to meet its burden of proof that no hotel use can be achieved in the Watergate complex.

Watergate West will seek the full 60 minutes to present its case if it is the only party in opposition to the application; otherwise, it will share its time with other parties in opposition.

Given that new counsel for Watergate West was not retained until January 22, 2004, because of possible conflicts of interest with other cooperatives in the complex, and given that the expert planners named herein were not retained until January 24, 2004, there is good cause for this request regarding the presentation of witnesses and expert report for Watergate West.

Sincerely,

Richard L. Aguglia

Richard L. Aguglia

cc: By Fax

Stephen Gell, Esq.
Zoning Counsel to Watergate South

Norman M. Glasgow, Esq.
Counsel to the Applicant

ANC 2A
c/o James W. Lewis

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By Fax

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