

## MEMORANDUM

**TO:** District of Columbia Zoning Commission

**FROM:** Joshua Mitchum, Development Review Specialist  
*JL* Joel Lawson, Associate Director Development Review

**DATE:** September 29, 2025

**SUBJECT:** **ZC Case 74-10B** – Request for a Modification without Hearing to an Approved Planned Unit Development at 21 Dupont Circle NW (Square 115, Lot 82)

### I. BACKGROUND

In 1970, the subject building (the “Euram Building”, the “Building”), an eight-story office building with below-grade parking was constructed at 21 Dupont Circle NW. The Euram Building contains 54,834 square feet of gross floor area (approx. 6.5 FAR) and has been used as office space since its construction.

Since then, the building and related properties have received the following Board of Zoning Adjustment (BZA) and Zoning Commission (ZC) approvals:

Order	Date	Action
ZC No. 81	February 1, 1974	<b>Approval</b> of a first-stage PUD and Zoning Map Amendment to the MU-9B Zone (formerly the C-3-B Zone).
ZC No. 101	December 13, 1974	<b>Approval</b> of a second-stage PUD and Zoning Map Amendment to MU-9B Zone (formerly the C-3-B Zone).
BZA No. 11875 <sup>1</sup>	April 28, 1975	<b>Approval</b> of additions and modifications to ground and mezzanine levels of the existing office building located at 1320 19 <sup>th</sup> Street NW.
BZA No. 11901 <sup>1</sup>	September 18, 1975	<b>Approval</b> of the construction of a new office building, retail uses, and below-grade parking at 1333 New Hampshire Avenue NW.
ZC No. 101A <sup>1</sup>	August 3, 1992	<b>Approval</b> of a modification to Order No. 101 to allow for a wider range of ground-floor uses in the building located at 1333 New Hampshire Avenue NW.
ZC 74-10A <sup>1</sup>	January 17, 2020	<b>Approval</b> of a modification to Order No. 101, which included changes to the building located at 1333 New Hampshire Avenue NW.

### II. RECOMMENDATION

After a review of the request, including a comparison of the proposed plans against the approved plans and the Order (ZC 74-10), The Office of Planning (OP) **concurs** with the applicant’s submission that the proposed refinements do not change the material facts upon which the Commission based its original approval of the PUD.

OP recommends that the proposed modifications be **approved**.

<sup>1</sup>Order did not affect the subject building (the Euram Building).

### III. MODIFICATION REQUEST AND OFFICE OF PLANNING ANALYSIS

In summary, the applicant is proposing to modify the approved PUD through the following changes:

- (1) New rooftop canopy, stair enclosure, guardrail, and mechanical equipment
- (2) New entrance vestibule, entrance canopy, ATU logo, guardrail and connection
- (3) New windows
- (4) New lobby and skylight
- (5) Change to Condition 2 in the Final Order (ZC 74-10)

OP's analysis of the proposed changes follows below.

#### Proposed Changes to Final Order

(1) New rooftop canopy, stair enclosure, guardrail, and mechanical equipment

The Applicant states that the Building's roof is currently not in use, which has prompted their proposal to construct a canopy, stairwell enclosure, and guardrail that would allow building occupants to access the roof and use it as a "significant building amenity" that would provide outdoor communal and recreational space.

OP supports these modifications as they do not significantly alter the bulk, height, or use while providing rooftop amenity space, consistent with penthouse permissions and requirements, for the occupants of the Building.

(2) New entrance vestibule, entrance canopy, ATU logo, guardrails, and connection

As the Building's front and main entrance faces Dupont Circle NW, the Applicant has proposed a new entry vestibule and canopy at the top of the building's stairs to accommodate a more aesthetically pleasing and protected entrance while creating a larger, enclosed lobby area. The Applicant has also proposed addition of signage, guardrails and walkway connection to better brand the building.

OP supports these modifications as they are largely aesthetic in nature and would facilitate an overall improved experience for the future full occupancy of the Amalgamated Transit Union and its employees and visitors.

(3) New windows

The Applicant has proposed replacing all of the Building's exterior-facing windows with new, high-efficiency windows made of high-performance glass. The Applicant states that proposed windows have been identified as a "new glass façade" on the submitted plans, and will be designed to look as close to the existing windows as possible to minimize impact on the overall appearance of the Building.

OP supports these modifications as they are aesthetic changes that do not significantly deviate from the overall design direction that was approved for the subject property in the Approved PUD.

(4) New lobby and skylight

The Applicant has proposed the creation of a new, more welcoming ground floor lobby that is enclosed, lit, and conditioned. This would include a new skylight cover at the third level of the building, which result in a gross floor area increase of 1,158 square feet, and a defined FAR increase from 6.5 to 6.6, which remains within the FAR permitted under the PUD. The skylight would not be visible from the street.

OP supports these modifications as they improve the Building's ability to continue operating as an office use and would not represent a substantial change to the Building's bulk or height. Furthermore, the Applicant has identified that the Building's FAR would increase to 6.6, which is within the amount permitted under this zone, as a result of the modification, and has accordingly sought to change Condition 2 of ZC Order No. 101, which is discussed below.

(5) Change to Condition 2 in the Order (74-10)

Although the addition of the skylight would not result in an FAR that requires zoning relief, the applicant is requesting that condition #2 in Z.C. Order No. 101 be modified as follows (change shown in bold and underlined):

- The property shall be developed with no more than five separate buildings. The existing Euram and Sunderland Buildings shall not be increased or decreased in terms of gross floor area, provided that certain minor modifications may be made to the Sunderland Building, as shown on Exhibit 7A, B, C, & D of the public hearing, **and the changes as shown in Exhibit of the record in Case No. 74-10B may be made to the Euram Building, some of which increase its gross floor area.**

OP supports this modification, which would impact the internal layout of the Building, rather than the bulk, height, or form that was approved in the original PUD. This modification represents a modest increase in FAR (6.5 to 6.6) and would not exceed the maximum permitted FAR originally approved for the overall PUD site (7.0).

**IV. ANC COMMENTS**

A report from ANC 2B in support of the subject application has been submitted into the record as Exhibit 4.

**V. OTHER DISTRICT AGENCY COMMENTS**

As of the date of this report, comments from other District agencies have not been received.

**VI. COMMUNITY COMMENTS**

As of the date of this report, comments from the community have not been submitted into the record.

**VII. ATTACHMENTS**

Attachment 1 – Location Map

**Location Map**

