

July 22, 2025

**Via IZIS**

Anthony Hood, Chairman  
District of Columbia Zoning Commission

**Re: Z.C. Case No. 74-10B - Request for Modification without Hearing to an  
Approved PUD at 21 Dupont Circle NW (Sq. 115, Lot 82) (“Property”)**

Dear Chairman Hood and Members of the Commission:

On behalf of the Amalgamated Transit Union (the “**ATU**” or “**Applicant**”), the owner of the Property, we hereby respectfully request that the Zoning Commission (“**ZC**” or “**Commission**”) approve a modification without hearing to the planned unit development (“**PUD**”) approved in ZC Orders No. 81 and 101 (the “**Orders**”). The Orders approved a new office and retail building within a site that includes multiple properties of which the Property is a part. The modifications requested herein affect only the Property and the building thereon and are for minor changes to upgrade the building systems, to improve the building functionality, and to make the building suitable for the ATU’s eventual occupancy and use (the “**Proposed Modifications**”).

This modification request is being made pursuant to Subtitle Z § 703. Attached with this request are the following exhibits:

- Exhibit A – Authorization letter from the Applicant;
- Exhibit B – Copies of ZC Orders No. 81 and 101; and
- Exhibit C – Plans and drawings showing the proposed modifications (the “**Plans**”).

**A. Background and Approved PUD**

In 1970, the building located at 21 Dupont Circle NW (the “**Building**” or “**Euram Building**”) was constructed. The Building is an eight-story office building with below-grade parking originally constructed for the Euram Corporation. The Building contains approximately 54,834 square feet of gross floor area (approximately 6.5 FAR) and has been continually used as an office building since its construction. The ATU purchased the Building in 2024 in order to relocate their headquarters there.

With the ATU's agreement, the Building was recently designated a historic landmark by the Historic Preservation Review Board ("**HPRB**").<sup>1</sup>

In February 1974, the ZC, in Case No. 71-30, approved a first-stage PUD and Zoning Map amendment to the C-3-B (now MU-9B)<sup>2</sup> zone, pursuant to Order No. 81 (the "**Preliminary Order**"). The PUD includes the following properties: the Property, 1320 19th St. NW (the "**1320 Property**"), 1307 New Hampshire Ave. NW (known as the Christian Heurich Mansion and Carriage House, the "**Heurich Mansion Property**"), and 1333 New Hampshire Ave. NW (the "**1333 NH Property**"). The approved PUD was for a new 12-story office and retail building at the 1333 NH Property (the "**1333 NH Building**"), the transfer of unused density from the other properties in the PUD to the 1333 NH Property, the retention of the Building and the building at the 1320 Property (the "**1320 Building**"), and the preservation of the buildings at the Heurich Mansion Property (collectively, the "**Overall PUD**").

In December 1974, the ZC, in Case No. 74-10, approved the second-stage PUD and rezoning application to C-3-B (now MU-9B), pursuant to Order No. 101 (the "**Final Order**"), for the new 1333 NH Building, and only the Heurich Mansion Property would transfer 82,000 square feet of unused density to the 1333 NH Property. Importantly, the Final Order does not include the Euram Building transferring any density to the 1333 NH Property. The Final Order includes 17 conditions, one of which (#2) is affected by this current modification application.

In April 1975, the Board of Zoning Adjustment ("**BZA**"), in Application No. 11875, approved a further processing application to allow additions and changes to the 1320 Building. These changes did not affect the Euram Building or the Property.

In June 1975, the BZA, in Application No. 11901, approved a further processing application to allow construction of the 1333 NH Building. This application did not affect the Euram Building or the Property. The 1333 NH Building was subsequently constructed circa 1978.

In 1992, the ZC, in Case No. 92-5M/74-10F and pursuant to Order No. 101-A, approved a modification to a condition in the Final Order to allow a wider range of uses on the ground floor of the 1333 NH Building. The modification did not affect the Euram Building or the Property.

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<sup>1</sup> Case No. 25-03.

<sup>2</sup> Pursuant to ZC Order No. 308, the C-3-B zone became the C-3-C zone in 1980, which then became the MU-9B zone in the 2016 Zoning Regulations.

In 2019, the ZC, in Case No. 74-10A, approved an application for changes to the 1333 NH Building and to modify two conditions in the Final Order for such changes. This modification did not affect the Euram Building or the Property.

**B. Requested Modification and Satisfaction of the Standards for Approving a Modification without Hearing**

1. Proposed Modifications

As stated above, the requested modification without hearing is to allow changes to the Euram Building to accommodate the ATU's future occupancy and use. Before the ATU can begin occupying the Building, they propose mostly cosmetic changes to modernize the Building, improve circulation and efficiency, and make it suitable for their operations and programming. With these proposed changes, the ATU will transform and preserve this inefficient building suffering from years of deferred maintenance into the noteworthy neighborhood and historic landmark that it warrants, suited to the needs of the ATU. Importantly, none of the proposed modifications affect any other buildings or properties in the Overall PUD, and all of the proposed changes to the Building have been reviewed by and received concept approval from the HPRB.<sup>3</sup>

As shown on the Plans attached as Exhibit C, the Proposed Changes include the following:

- *New rooftop canopy, stair enclosure, guardrail, and mechanical equipment.* The Building's roof is currently not available for use, so the Applicant proposes a new canopy, stairwell enclosure, and guardrail to allow building occupants to access the roof and use it as a significant building amenity that will provide outdoor communal recreation space and spectacular views. In addition, the Applicant proposes to include new mechanical equipment on the roof. This new equipment is necessary to upgrade the Building's systems. These new rooftop features conform to the requirements for penthouses and rooftop structures in Subtitle C, Chapter 15, and they were carefully designed with the lightest materials – mainly glass – to minimize visibility and the aesthetic impact on the Building.
- *New entrance vestibule, entrance canopy, ATU logo, guardrails, and connection.* The Building's front and main entrance faces Dupont Circle, and the Applicant proposes a new entry vestibule and canopy at the top of the stairs to accommodate a better, more protected entrance experience and to create a new larger enclosed

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<sup>3</sup> HPA 25-212 approved on June 26, 2025.

lobby (see below). In addition, the Applicant proposes a guardrail at the third floor to create a walkway between to unconnected front portions of the third floor for better circulation. The Applicant also proposes to add an ATU logo to identify them as the owner-occupant. Finally, the Applicant proposes a new recessed walkway and guardrail connecting the front portions of the sixth floor for better circulation. All of these elements are made primarily of glass and were carefully designed to minimize impact on the landmark Building.

- *New windows.* The Applicant proposes to replace all of the Building's exterior-facing windows with new high-efficiency windows made of high performance glass, which is identified as a new glass façade on the Plans. The new windows will look as close to the existing as possible and will have only a nominal impact on the appearance of the Building.
- *New lobby and skylight.* The center of the first floor of the Building is currently unenclosed and open to the elements. This space is dark, uninviting, and has little utility. The Applicant proposes to change that and to create a new grand welcoming, enclosed, lit, and conditioned ground floor lobby. The proposed improvement includes a new skylight at the third level of the Building to cover the new lobby area. The skylight will not be visible from outside the Building, but it will add a nominal 1,158 square feet of gross floor area only because it will be covering floor area that is currently uncovered. This will result in the Building having a FAR of 6.6.
- *Change to Condition #2 in the Final Order.* In order to accommodate the slight increase in gross floor area for the new skylight over the lobby, the Applicant requests 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.**

This condition modification is necessary only because covering the lobby with the proposed skylight technically will add gross floor area even though the Applicant does not propose expanding the Building's floor area. The Building has approximately

4218 square feet unused density available, so the slight proposed increase of 1,158 square feet will be within what is otherwise permitted at the Property.<sup>4</sup>

## 2. Satisfaction of Modification without Hearing Standards

Subtitle Z § 703 establishes the standards and requirements for a modification without hearing. A modification without hearing is “a modification in which impact may be understood without witness testimony, including, but not limited to a proposed change to a condition in the final order, . . . or a redesign or relocation of architectural elements and open spaces from the final design approved by the Commission.” Subtitle Z § 703.6.

As described above, the Proposed Changes – which consist only of a redesign of architectural elements and a change in one condition – fall squarely within the standards for a modification without hearing. The impacts of this proposed limited modification may be understood from the Plans and without the need for testimony.

### **C. Service on Parties and Community Engagement**

The parties to the original Case No. 74-10 were the affected Advisory Neighborhood Commission (“ANC”) 2B, in which the Property is located, and the Dupont Circle Citizens Association (“DCCA”). ANC 2B and the DCCA are concurrently being served with this application in satisfaction of Subtitle Z § 703.10.

Prior to the HPRB consideration of the proposed Building changes, the Applicant engaged with ANC 2B and the Dupont Circle Conservancy, both of which supported the changes.

### **D. Conclusion**

The Proposed Modifications are consistent with the Overall PUD approval and do not materially affect the Overall PUD. As the ATU plans to occupy the Building as its new headquarters, modest changes are necessary to create the efficient, welcoming, and high-quality spaces suitable for its use. Other than the slight change to one condition necessary for the changes, all other conditions in the Final Order will remain. Given the modesty of the Proposed Modifications, the use of the modification without hearing process outlined in Subtitle Z § 703 is appropriate for this application. Therefore, the Applicant respectfully requests that the Commission

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<sup>4</sup> Per Finding of Fact #8 in the Preliminary Order, the Property gained an additional 0.5 FAR (4218 SF) from its inclusion in the Overall PUD, but this additional density is unused.

consider and approve this modification without hearing its next available public meeting.

Please feel free to contact the undersigned if you have any questions or comments regarding this application.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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Cary R. Kadlecek

## Certificate of Service

The undersigned hereby certifies that the foregoing documents were delivered by electronic mail to the following addresses on July 22, 2025.

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    /s/      
Cary Kadlecek