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VIA IZIS

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Anthony J. Hood, Chairperson
Zoning Commission for the District of Columbia
441 4th Street, N.W., Suite 210S
Washington, DC 20001

**Re: Application for Modification Without Hearing
Zoning Commission Case Nos 62-19/62-19A/62-19B
Watergate Office Building at 2600 Virginia Ave. NW**

Dear Chairperson Hood and Members of the Commission:

On behalf of Friedman Capital Advisors, LLC (the "Applicant"), we hereby submit this application for a Modification Without Hearing to the planned unit development ("PUD") approved pursuant to Z.C. Order Nos. 62-19,631A, 631B for property located at 2600 Virginia Ave. NW (Lot 808, Square 8) (the "Property"). The Property is improved with a 12 story building containing office use throughout (the "Existing Building"). Due to the current economic climate and the District's goals to increase housing and affordable housing, the Applicant requests a modification to the approved PUD to convert the top six floors of approved office use in the Existing Building to residential use.

As explained herein, the application is properly reviewed as a Modification Without Hearing pursuant to Subtitle Z § 703.6 because the "impact may be understood without witness testimony, including, but not limited to a proposed change to a condition in the final order, a change in position on an issue discussed by the Commission that affected its decision, or a redesign or relocation of architectural elements and open spaces from the final design approved by the Commission."

Attached hereto as **Exhibit A** is a letter from the Applicant authorizing Cozen O' Connor to file and process the application. Attached hereto as **Exhibit B** is the Application Signature Page. Also included is the required filing fee of \$520.00.

Pursuant to Subtitle Z § 703.13, a request for a modification without hearing shall be filed with the Office of Zoning at least 35 days prior to the public meeting at which the request is to be considered. Consistent with this required timeframe, the Applicant respectfully requests that the application be placed on the Commission's April 30th public meeting, which is 55 days from the date of this filing.

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I. The Property

The Property is located within the Watergate Complex which includes the area bounded by Virginia Avenue, New Hampshire Avenue, F Street and the Rock Creek Parkway. The Property is located within the MU-2 Zone and the Future Land Use Map designates the Property as Medium Density Commercial and High Density Residential.

The Property is more generally situated in the Foggy Bottom neighborhood, within the District's north west quadrant. The area is characterized by a mixture of land uses, predominantly in high rise buildings including apartment houses, office buildings, hotels, gasoline service stations, and the Kennedy Center. The buildings which surround the Property are all part of the Watergate complex. The complex is made up of a mix of uses including retail, office, hotel, restaurant, and residential. The Property itself is currently made up entirely of Office use.

II. Prior Zoning Approvals

Pursuant to Zoning Commission Order No. 62-19, dated July 17, 1962, the Zoning Commission approved the Watergate PUD as a mixed-use project to be developed in four stages with 1,300 residential units, 300 hotel rooms, 185,000 square feet of office space, 94,000 square feet of retail use, below grade parking, and open space (the "Watergate Project").

Pursuant to BZA Appeal Nos. 7234 (approved in 1963), 7903 (approved in 1964), 8117 (approved in 1965), and 9303 (approved in 1968), the Board approved further processing for Stages 1 through 4, respectively, of development of the Watergate Project.

Pursuant to Z.C. Case No. 68-58, dated December 18, 1968, the Zoning Commission approved modifications to "Building 1" within Stage IV of the Watergate Project, which is the office building located at 600 New Hampshire Avenue, NW (the "Office Building"), to provide for the combination of residential and office uses, distributed vertically, with 325 residential units and 260,600 square feet of office use. The type of office use permitted in Z.C. Case No. 68-58 was "restricted to those types of office uses permitted in the SP District." See Finding of Fact No. 1. Pursuant to BZA Appeal No. 9919, dated January 30, 1969, and effective on February 3, 1969, the BZA approved further processing of Building 1 to be constructed in three substages and also approved a reduction in the number of residential units in Building 1 from 325 to no less than 287. Pursuant to BZA Appeal No. 9919, dated March 24, 1970, effective on May 11, 1970, the BZA approved a further reduction in residential units in Building 1 from 287 to 260 and a reduction in the number of parking spaces from 580 to 551. Finally, pursuant to Z.C. Order No. 100 (Z.C. Case No. 72-23), dated November 15, 1974, the Zoning Commission approved an amendment to Z.C. Case No. 68-58 to expand the types of office uses permitted in the Office Building to include a variety of office uses not otherwise permitted in the SP District.

Pursuant to Z.C. Order No. 125 (Z.C. Case No. 75-3), dated February 12, 1976, the Zoning Commission approved amendments to the types of office uses permitted within the Stage II Office Building.

Pursuant to Z.C. Order No. 631 (Z.C. Case No. 89-6M/62-19), dated September 11, 1989, and effective on November 3, 1989, the Zoning Commission approved a modification to the hotel

portion of the Watergate Project to permit a 2,000 square foot expansion to the hotel's health club. Pursuant to Z.C. Order No. 03-16, dated June 14, 2004, and effective on August 6, 2004, the Zoning Commission approved a conversion of the hotel into an apartment house use. The hotel was closed in 2007 pending redevelopment, but the conversion never occurred and the Commission's approval in Z.C. Order No. 03-16 expired. Pursuant to Z.C. Order No. 631A (Z.C. Case No. 62-19A), dated January 9, 2012, and effective on June 22, 2012, the Zoning Commission approved a minor modification to reopen the hotel and increase the number of hotel rooms to 355 rooms.

Pursuant to Zoning Commission Order No. 631B (Z.C. Case No. 62-19B), dated July 30, 2018, the Zoning Commission approved a minor modification to the Watergate Planned Unit Development for the office building located at 600 New Hampshire Avenue, NW, authorizing the construction of approximately 1,700 square feet of habitable penthouse space and an adjacent roof deck as an expansion of the existing penthouse, to be used as accessory tenant amenity space.

Copies of the above-referenced orders are attached as **Exhibit C**.

III. Proposed Modification to Existing Building

The Applicant requests a Modification Without Hearing to the approved PUD to convert floors 6 through 11 from office to residential use. The Proposed Modification to the existing PUD will allow for the conversion of approximately 89,940 sq. ft. of office space into approximately 87 residential units with 76 apartments across floors six through nine and 11 for sale condominium units on floors ten and eleven. The modification will be accomplished without any changes to the Existing Building's height or density and only limited changes to the Existing Building's exterior façade to accommodate the residential use. As set forth below, the proposed modification advances the District's policies of supporting residential conversions, as it will create new market rate and affordable housing units. No zoning relief is needed to accommodate the modification. Accordingly, the Zoning Commission will be able to understand the proposal without witness testimony. Attached hereto as **Exhibit D**, are architectural drawings showing the proposed modifications to the Existing Building to accommodate residential use on floors six through eleven.

IV. Consistency with PUD Evaluation Standards

In deciding a PUD application the Zoning Commission shall "judge, balance, and reconcile the relative value of the public benefits and project amenities offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case." Subtitle X § 304.3. The Zoning Commission shall find that the proposed development: (i) [i]s not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site; (b) [d]oes not result in unacceptable project impacts on the surrounding area or on the operation of city services and facilities but instead shall be found to be either favorable, capable of being mitigated, or acceptable given the quality of public benefits in the project; and (c) [i]ncludes specific public benefits and project amenities of the proposed development that are not inconsistent with the Comprehensive Plan or with other adopted public policies and active programs related to the subject site." Subtitle X § 304.4.

A. Comprehensive Plan Consistency

The Comprehensive Plan Generalized Policy Map identifies the Property as situated within a Neighborhood Conservation Area, where change is expected to be modest in scale and focused on reuse of existing buildings rather than wholesale redevelopment. The Comprehensive Plan describes Neighborhood Conservation Areas as “neighborhoods with little vacant or underutilized land” where “change... will typically be modest in scale” and where “some new development and reuse opportunities are anticipated” in order to conserve neighborhood character while guided by the Future Land Use Map.

Consistent with that guidance, the Comprehensive Plan states that the purpose of Neighborhood Conservation Areas is to “conserve and enhance established neighborhoods, but not preclude development, particularly to address city-wide housing needs,” and expressly recognizes that “limited development and redevelopment opportunities do exist within these areas.” The proposed residential conversion fits squarely within this framework by reusing an existing structure, maintaining the established scale and character of the building, and introducing residential use without increasing density.

In addition, the Future Land Use Map designates the Property for high-density residential and medium-density commercial uses, and densities in Neighborhood Conservation Areas are expressly “guided by the Future Land Use Map and Comprehensive Plan policies.” The conversion of office space to residential use is therefore fully consistent with both the Neighborhood Conservation Area designation and the applicable FLUM guidance.

B. No Unacceptable Project Impacts

The proposed modifications will not result in unacceptable impacts on the surrounding area or the operation of city services and facilities. The project involves the conversion and reuse of an existing office building, rather than new construction or an increase in density, and does not alter the building’s approved bulk, height, footprint, or overall intensity of use. In fact the proposed residential conversion will have affirmative public benefits by advancing District policies that encourage the creation of additional housing through the adaptive reuse of existing buildings, particularly in areas with limited vacant or underutilized land.¹ Introducing residential use within an existing building supports the city-wide housing objective of 15,000 new residents downtown by 2028, while maintaining the established scale and character of the surrounding area.

The conversion is not anticipated to adversely affect traffic conditions. Residential use generally generates fewer and more dispersed trips than office use, particularly during weekday peak periods. The proposal does not increase floor area or intensity of use and does not modify approved access points, parking supply, loading facilities, or circulation patterns. As a result, traffic conditions in the surrounding area are expected to remain stable and, in some respects, improve relative to the previously approved office use.

C. Public Benefits and Project Amenities

¹ See <https://dmped.dc.gov/page/housing-downtown-hid-program> (Last accessed March 6, 2026)

Finally, in deciding a planned unit development application, the Zoning Commission “shall judge, balance, and reconcile the relative value of the public benefits and project amenities offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case.” Here, that balancing has already occurred.

The Watergate PUD was approved as a comprehensive, mixed-use development that incorporated substantial on-site amenities as part of the overall project design, including open space, retail and service uses, hotel and residential components, health club, parking, and pedestrian-oriented public areas. Those amenities have long served residents, employees, visitors, and the surrounding community. Additionally, introducing residential use within an existing building provides a public benefit by furthering the District’s stated goal of increasing the number of residents Downtown, including the objective of adding 15,000 new residents by 2028.

V. Application Properly Filed as a Modification Without Hearing

The term “Modification Without Hearing” is defined as a modification in which the impacts may be understood without witness testimony, including, but not limited to, a *redesign or relocation of architectural elements* and open spaces from the final design approved by the Commission. Whether a modification may be approved without witness testimony is within the Commission’s discretion. A request to add or change a zoning map designation to an approved planned unit development may not be considered without a hearing. 11-Z DCMR § 703.6.

Here, the Applicant does not seek to modify any conditions imposed by the Commission in the final Orders. The only condition in the applicable PUD Orders that is potentially relevant to the proposed conversion is the limitation on total commercial floor area. That condition is not implicated by the application. To the contrary, the proposal would reduce the amount of commercial gross floor area by converting existing office space to residential use, and therefore remains fully consistent with the Commission’s prior approvals. Nor does the application request any change to the Zoning Map designation. The Watergate PUD is located in a mixed-use zone in which both office and residential uses are permitted and the original PUD order approved a mix of uses.

Because the proposed changes involve a permitted use in the in both the Original PUD Order and the underlying zone, do not increase density, bulk, height, or commercial floor area, and do not alter any conditions of approval, the impacts of the application can be readily understood from the written record without witness testimony. Accordingly, the application is properly filed as a Modification Without Hearing pursuant to 11-Z DCMR § 703.6.

VI. Jurisdiction of Other Agencies

The Office Building is a designated historic landmark and is located within the area governed by the Shipstead-Luce Act. Thus, the Project is subject to historic design review and the architectural team will be submitting the plans for review.

VII. Community Engagement

The Property is located within the boundaries of Advisory Neighborhood Commission (“ANC”) 2A. Prior to filing this application the Applicant engaged with ANC 2A commissioners, including the ANC Single Member District commissioner for the Property. On February 25, 2026, the Applicant presented the application at a public community meeting hosted by the ANC. The ANC engaged with the applicant and was generally supportive but no vote was taken. The Applicant looks forward to returning to the ANC to answer any additional questions and present information for HPRB.

Pursuant to Subtitle C § 1504.4(c) and Subtitle Z § 703.13, the Applicant is required to formally serve a copy of the subject application on all parties to the original proceeding at the same time that the request is filed with the Office of Zoning. In 1962, when the original PUD was approved, neither the Zoning Commission (“Commission”) nor the Board of Zoning Adjustment (“Board”) had rules creating party status. Standing as a party came in only after 1972, when the Court of Appeals determined that the D.C. Administrative Procedure Act applied to the Commission and the Board. Consequently, a copy of this request for consent calendar modification has been sent to the Advisory Neighborhood Commission (“ANC”) 2A as well as to the owners of the buildings within the Watergate Project, including (i) the Boards of Directors of Watergate East, Inc., Watergate West, Inc., and Watergate South, Inc., all of which are the cooperative associations which own the three apartment buildings in the project, (ii) Watergate Hotel LLC, the owner of the hotel building; (iii) Washreit Watergate 600 OP LP.

VIII. Conclusion

The Applicant respectfully requests approval of this application for a Modification Without Hearing to expand the residential use already approved and present within the Watergate Complex. The request is consistent with the intent of the Zoning Commission in approving the original application.

Sincerely,

COZEN O'CONNOR



Meridith H. Moldenhauer



Zachary R. Bradley

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Application for Modification Without Hearing Zoning Commission Case Nos 62-19/62-19A/62-19B was served the following in accordance with Subtitle Z § 703.10 on March 6, 2026

Advisory Neighborhood Commission 2A
2A@anc.dc.gov Via Email

Ed Comer
Single Member District Representation and Secretary
2A04@anc.dc.gov Via Email

Board of Directors of Watergate East, Inc.
Judith Eaton, Chairperson
eaton@chea.org Via Email

Board of Directors of Watergate West, Inc.
2500 Virginia Avenue, NW
Washington, DC 20037 Via US Mail

Board of Directors of Watergate South, Inc.
700 New Hampshire Avenue, NW
Washington, DC 20037 Via US Mail

Watergate Hotel LLC
250 W 57th Street, Suite 1818
New York, NY 10107 Via US Mail

WASHREIT WATERGATE 600 OP LP
600 New Hampshire Ave NW Suite 800
Washington, DC 20037-2403 Via US Mail

Office of Planning
planning@dc.gov Via Email


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