

August 19, 2024

Via JZIS

Board of Zoning Adjustment
441 4th Street, N.W.
Suite 210S
Washington, DC 20001

Re: Prehearing Submission - BZA Case No. 21160 – 1314 21st Street, NW

Dear Chairperson Hill and Members of the Board:

Enclosed is an updated self-certification and the current certificate of occupancy. The Applicant is updating the relief to be a use variance to add prepared food shop and retail to the existing approved art gallery use. The Applicant refers to the Applicant's Statement to support its use variance argument and would add that it would be an undue hardship (rather than simply a practical difficulty) to convert the space to a residence given the substantial cost, given the lower level was purposefully built as and has always been used for commercial purposes. Additionally, the Applicant has gone into detail about the issues with using the space for an approved art gallery use without the approval for the prepared food shop and retail as the tea service is integral to the art gallery use. This has been established as the tea service and tea sale use has ceased since the initial infraction and the gallery is now suffering financially and will not be able to continue without the tea service.

Respectfully Submitted,

Alexandra Wilson

Alexandra Wilson
Sullivan & Barros, LLP

CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2024, an electronic copy of this submission was served to the following:

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Respectfully Submitted,

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