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September 22, 2025

VIA IZIS

Board of Zoning Adjustment
of the District of Columbia
441 4th Street, NW, Suite 210-S
Washington, DC 20001

**Re: BZA Case No. 21354
National Bankers Association | 1513 P Street, NW (Lot 3 in Square 194)
Applicant's Prehearing Statement (30-Day Filing)**

Dear Members of the Board:

On behalf of the National Bankers Association, the owner of the property located at 1513 P Street NW, also known as Lot 3 in Square 194 (the "Property"), we submit this letter as the Applicant's Prehearing Statement pursuant to Subtitle Y §§ 300.15 and 300.16.

As discussed in the Applicant's prior filings, the Applicant seeks zoning relief to permit a nonprofit organization to occupy and operate within the existing residential building on the Property. Specifically, the Applicant requests (i) a special exception pursuant to Subtitle U § 420.1(a) and Subtitle X § 901.2, and (ii) a variance pursuant to Subtitle X § 1000.1 from the requirement in Subtitle U § 203.1(o)(2) that an existing residential building used by a nonprofit organization contain at least 10,000 square feet of gross floor area.

The justifications for the requested relief are set forth in the Applicant's Preliminary Statement of Compliance with the Burden of Proof ([Exhibit 6](#)) (the "Preliminary Statement"). This letter updates the Board on developments since the Applicant filed its application on July 9, 2025, and provides additional information for the Board's consideration before the public hearing on October 22, 2025.

A. HPRB Concept Approval

The Property lies within the Greater Fourteenth Street Historic District, as discussed in the Applicant's Preliminary Statement. The proposed addition required review and approval from the Historic Preservation Review Board (HPRB) (HPA #25-329). The Applicant presented the HPRB

application to ANC 2B at its July 9, 2025, public meeting, and on July 24, 2025, the HPRB granted concept approval and delegated final review to staff as part of its consent agenda. *See Exhibit A.*

B. ANC 2B Resolution in Support

ANC 2B adopted a resolution supporting the application on September 13, 2025, which is in the record and marked as [Exhibit 19](#). As noted therein, the ANC considered the matter at its September 10, 2025, meeting and voted unanimously in favor, referencing its prior support for the HPRB application.

C. Conclusion


In light of the foregoing and the other materials in the record, including the Preliminary Statement setting forth the Applicant's justifications, the Applicant respectfully requests that the Board approve the requested special exception and area variance. Granting this relief will allow the National Bankers Association, a nonprofit and the nation's leading advocate for minority depository institutions (MDIs), to continue serving as a long-standing stakeholder in the neighborhood, having owned and occupied the existing residential building since 1997 and operated there without objection. The Board's approval will permit the Association to continue operating at the Property while benefiting from a third-story addition that will provide additional office space and support its mission-driven work.

As indicated in the Certificate of Service below, a copy of this Prehearing Submission is being served on ANC 2B, the Office of Planning, and the District Department of Transportation.

The Applicant looks forward to presenting the application to the Board at the October 22, 2025, public hearing and appreciates the Board's consideration of this request. Should you have any questions, please do not hesitate to have the Office of Zoning staff contact us.

Respectfully submitted,

HOLLAND & KNIGHT LLP

By: 
Leila Jackson Batties
Christopher S. Cohen

Enclosure

cc: Certificate of Service

Certificate of Service

I hereby certify that on September 22, 2025, a copy of the foregoing Prehearing Statement in support of BZA Case No. 21354 was served by electronic mail on the following at the addresses stated below.

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