

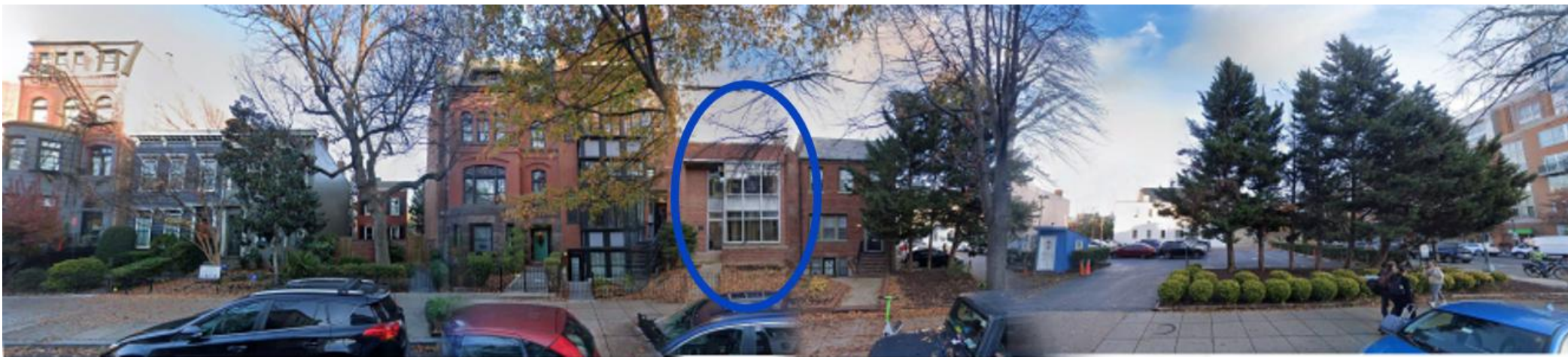
# BZA Case No. 21354

**National Bankers Association**  
**1513 P Street, NW (Square 194, Lot 3)**  
**Public Hearing**  
**October 22, 2024**



Board of Zoning Adjustment  
District of Columbia  
CASE NO. 21354  
EXHIBIT NO. 24





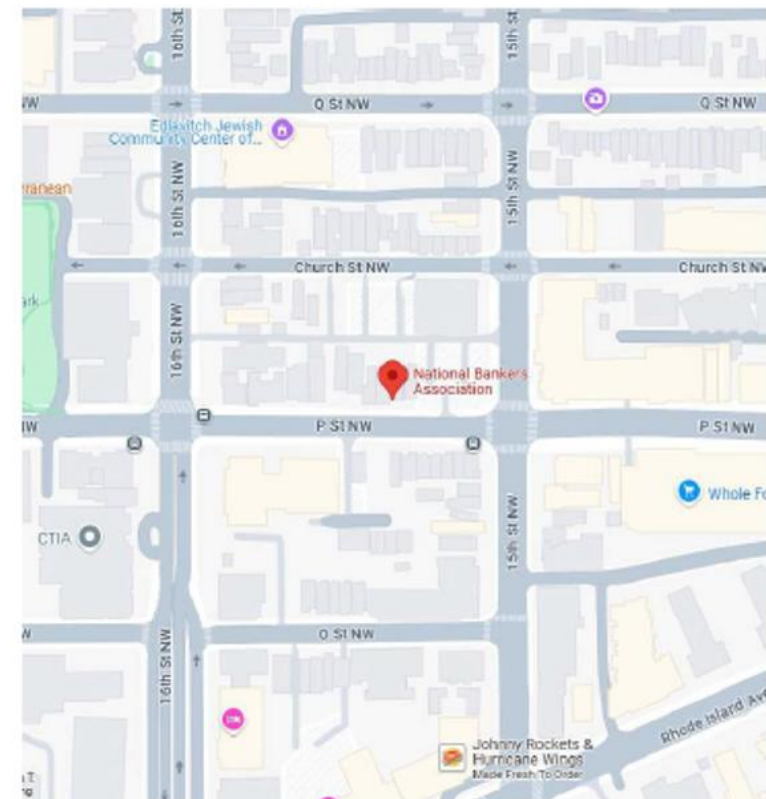
P STREET - NORTH STREET-SCAPE



P STREET - SOUTH STREET-SCAPE



ALLEY - VIEW TO SOUTH



VICINITY MAP

# Application Overview

Two requests for zoning relief:

1. **Special exception** pursuant to Subtitle U § 420.1(a) and Subtitle X § 901.2 to allow **non-profit organization** to use existing residential building in **RA-2/DC zone**.
2. **Area variance** from 10,000 s.f. min. requirement under Subtitle U § 203.1(o)(2).





# Agency and ANC Reviews

- **Office of Planning (OP)**

- Recommended approval on October 10, 2025 (Ex. 22)
- DDOT has no objections to the approval of application (Ex. 22)

- **Historic Preservation Review Board (HPRB)**

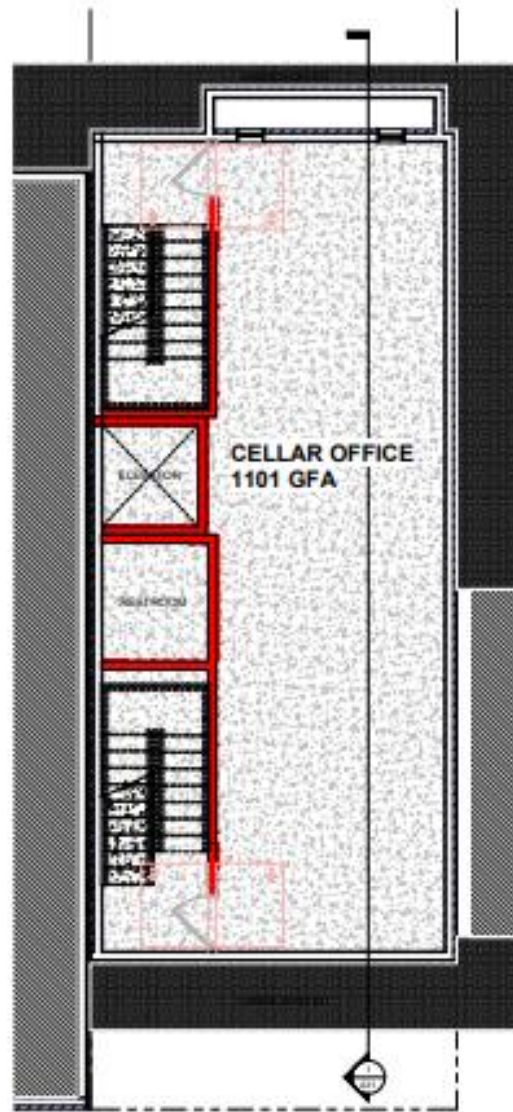
- Granted concept approval on July 24, 2025 (Ex. 20A)

- **Advisory Neighborhood Commission 2B**

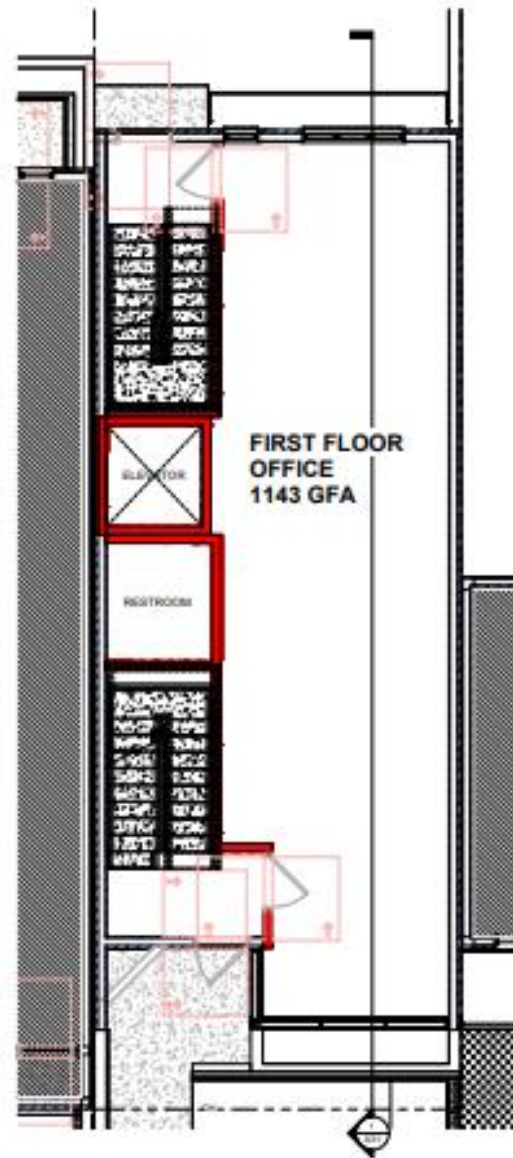
- July 9, 2025 – voted unanimously to support HPRB application
- September 10, 2025 - voted unanimously to support application (Ex. 19)



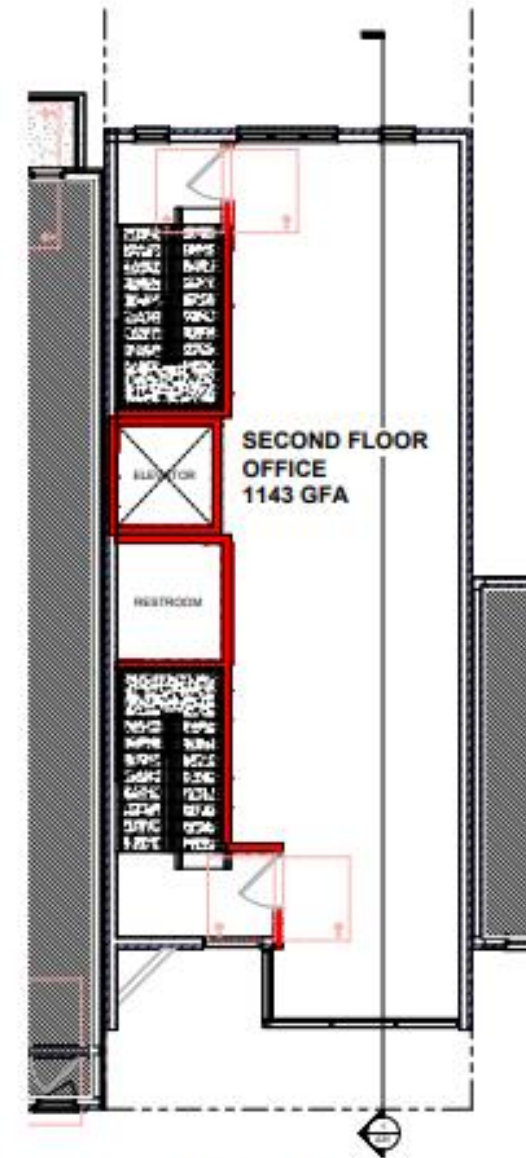




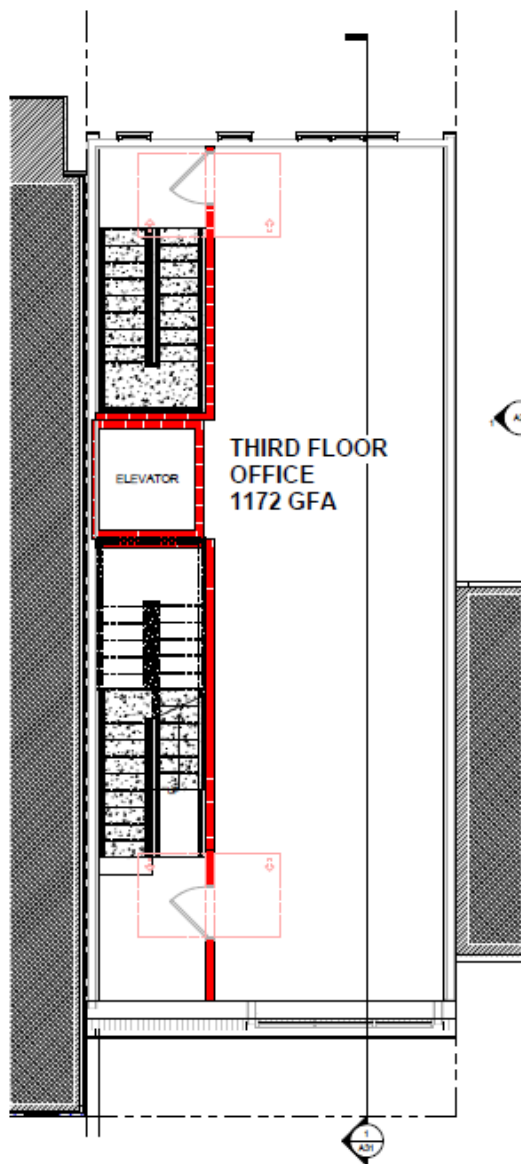
00 Cellar Level Proposed



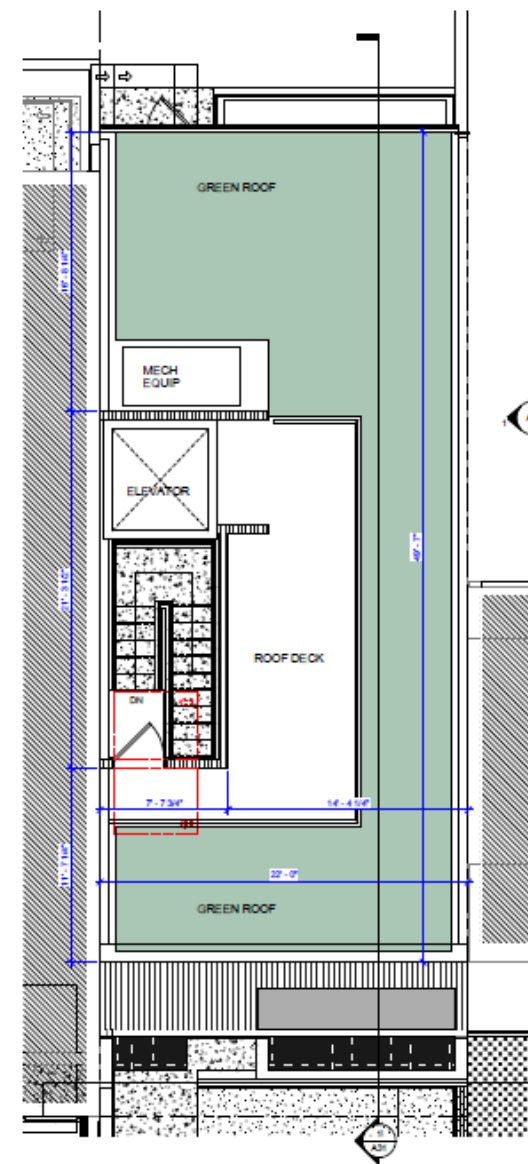
01 First Floor Proposed



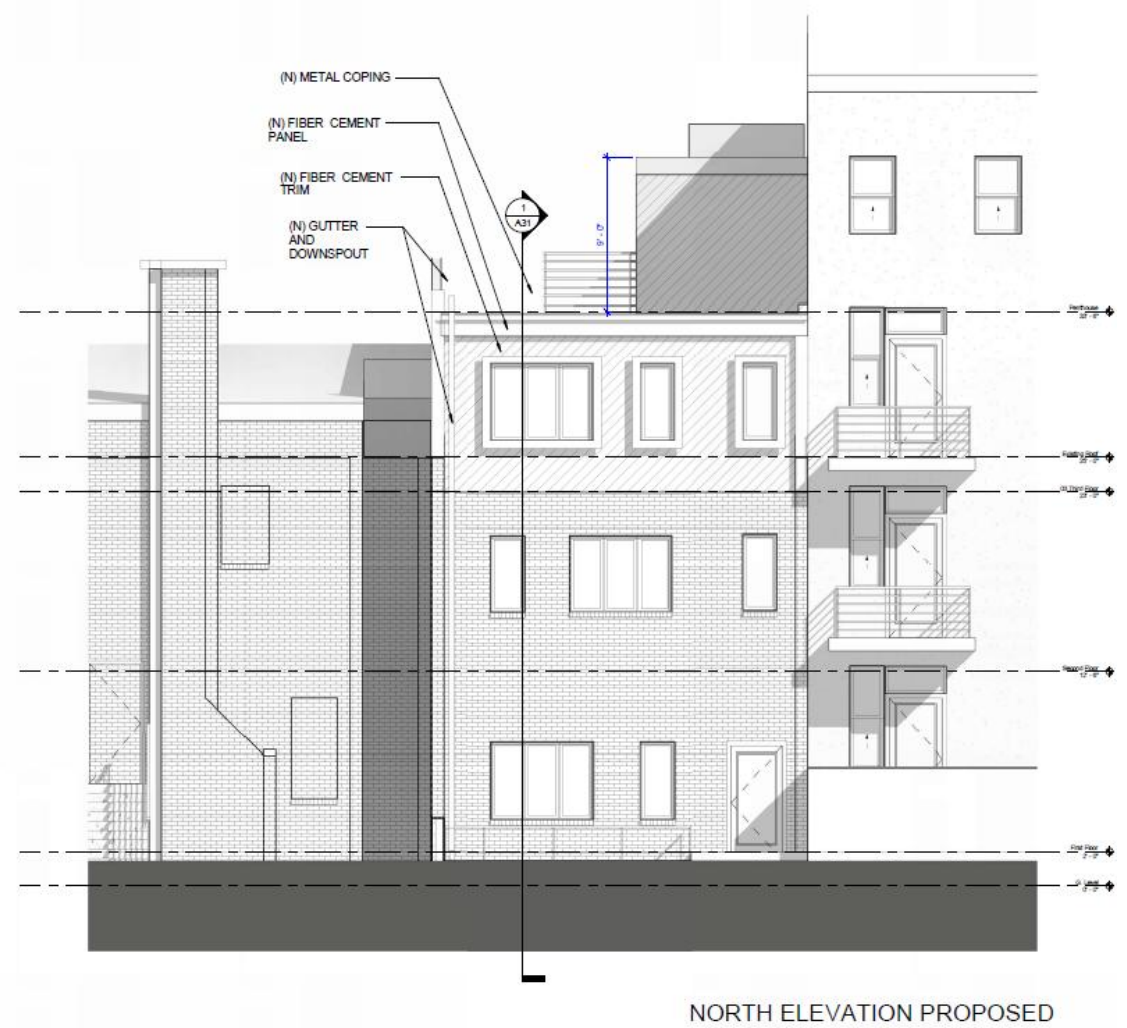
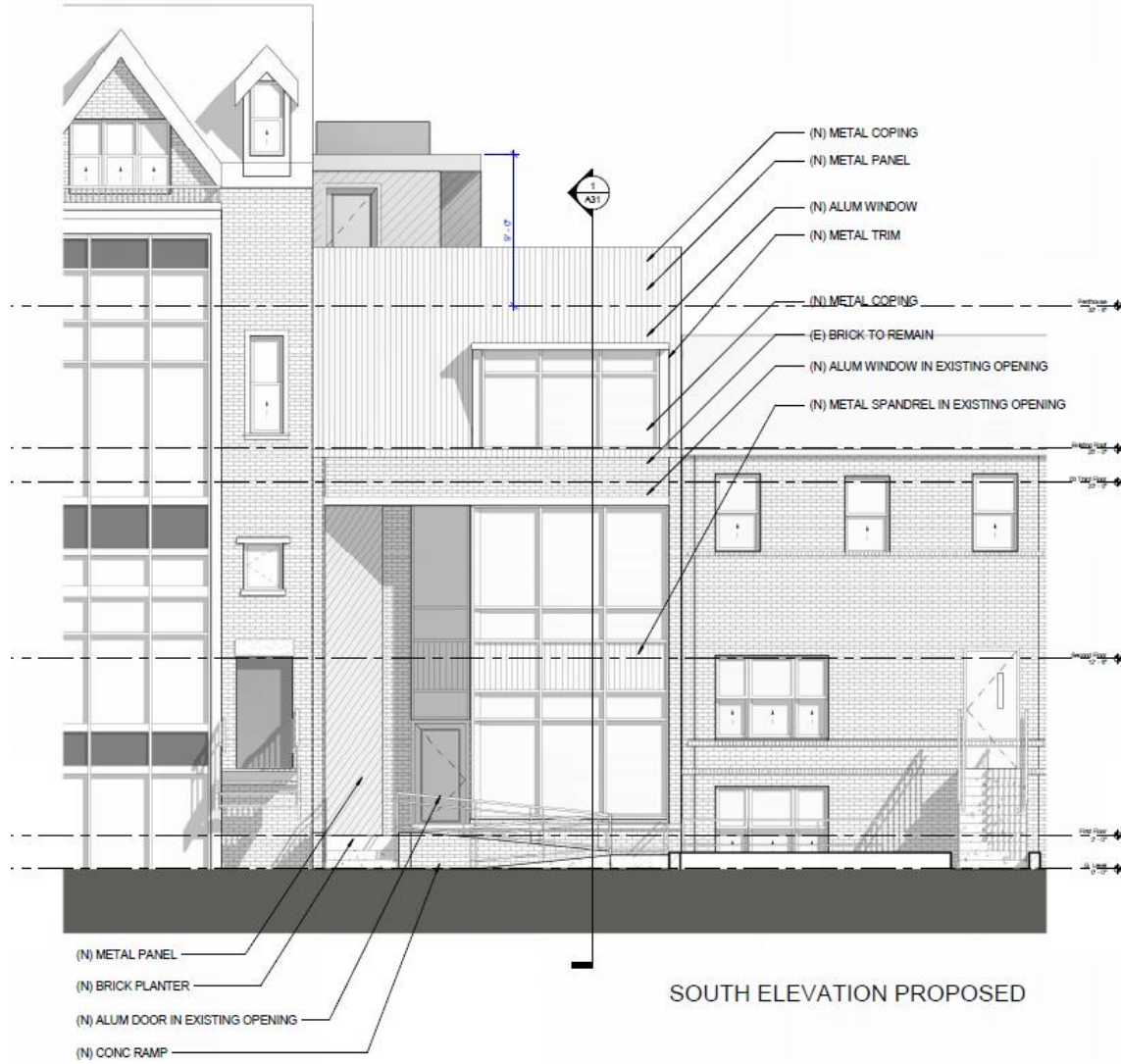
02 Second Floor Proposed



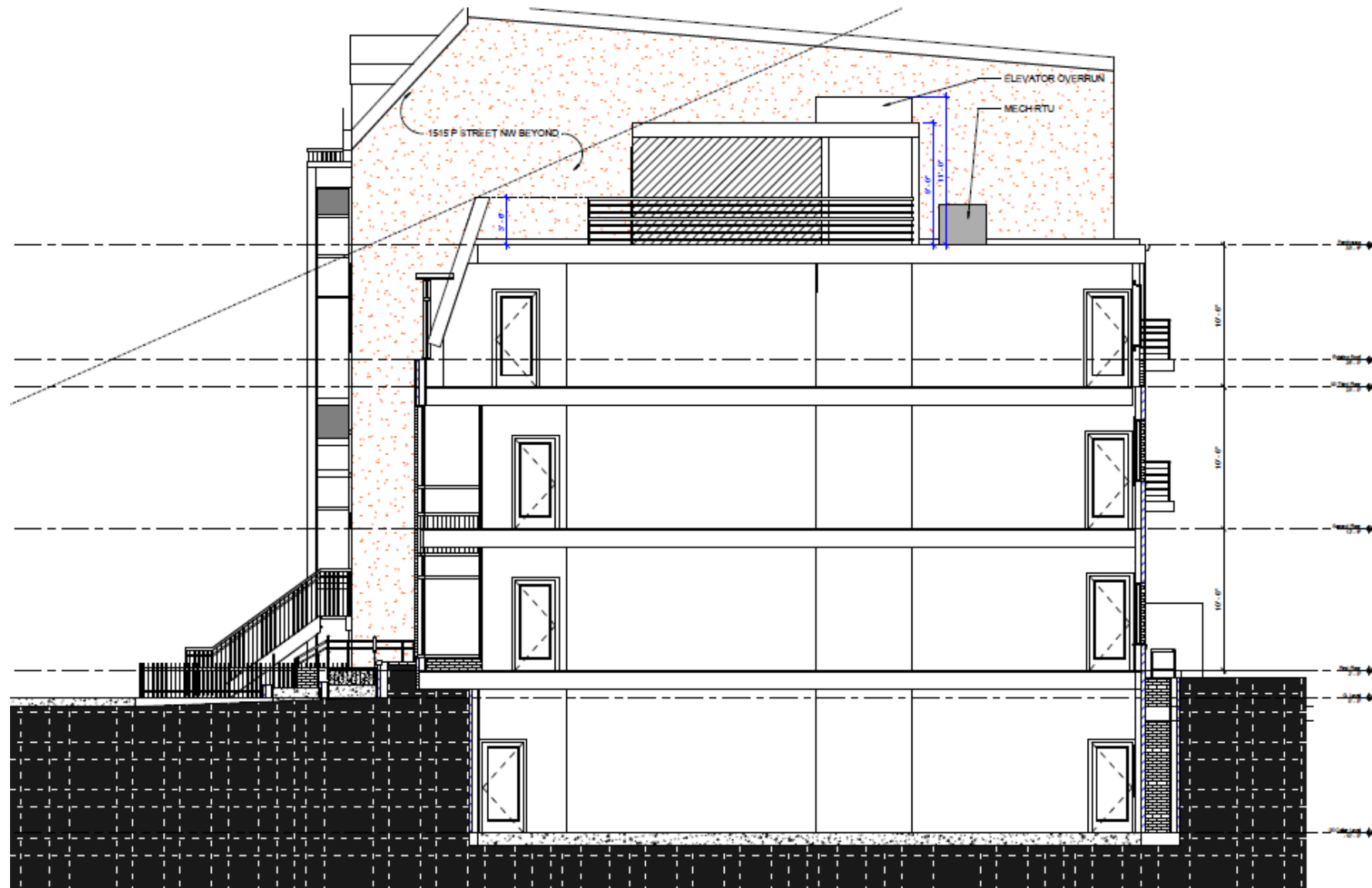
03 New Third Floor Proposed



00 Roof Plan Proposed







Section 4 Proposed

# Special Exception

## Justification

Subtitle U § 203.1(o)	Justification
<i>(1) If the building is located in the District of Columbia's Inventory of Historic Sites or, if the building is located within a district, site, area, or place listed on the District of Columbia's Inventory of Historic Sites;</i>	<b>Complies:</b> existing residential building is located within boundaries of Greater 14 <sup>th</sup> Street Historic District
<i>(2) If the gross floor area of the building in question, not including other buildings on the lot, is ten thousand square feet (10,000 sq. ft.) or greater;</i>	<b>Area variance requested</b>
<i>(3) The use of existing residential buildings and land by a nonprofit organization shall not adversely affect the use of the neighboring properties;</i>	<b>Complies:</b> Applicant has been a long-standing stakeholder; non-profit org. only employs 10 full-time staff; operations limited (M-F; 9am-5pm); expansion does not change nature of the existing use -> minimal disruption
<i>(4) The amount and arrangement of parking spaces shall be adequate and located to minimize traffic impact on the adjacent neighborhood;</i>	<b>Complies:</b> two dedicated parking spaces and non-profit org. only has 5-7 members on-site at one time, some of whom use public transit
<i>(5) No goods, chattel, wares, or merchandise shall be commercially created, exchanged, or sold in the residential buildings or on the land by a nonprofit organization, except for the sale of publications, materials, or other items related to the purposes of the nonprofit organization; and</i>	<b>Complies:</b> no goods, chattel, wares, or merchandise will be commercially created, exchanged, or sold; subject property will continue to be used as office space for non-profit org.
<i>(6) Any additions to the building or any major modifications to the exterior of the building or to the site shall require approval of the Board of Zoning Adjustment after review and recommendation by the Historic Preservation Review Board with comments about any possible detrimental consequences that the proposed addition or modification may have on the architectural or historical significance of the building or site or district in which the building is located;</i>	<b>Complies:</b> Applicant submitted plans and HPRB granted concept approval in July 2025



# Special Exception

## *Criteria*

- 901.2      The Board of Zoning Adjustment is authorized under § 8 of the Zoning Act, D.C. Official Code § 6-641.07(g)(2), to grant special exceptions, as provided in this title, where, in the judgment of the Board of Zoning Adjustment, the special exceptions:
- (a)      Will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps;
  - (b)      Will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps; and
  - (c)      Will meet such special conditions as may be specified in this title.

Relief granted through a special exception is **presumed appropriate, reasonable, and compatible** with other uses in the same zoning classification, **provided the application satisfies the specific requirements for the relief requested.** In reviewing an application for special exception relief, “[t]he Board’s discretion . . . is limited to a determination of whether the exception sought meets the requirements of the regulation.”

# Special Exception

## *Justification*

- *“...harmony with the general purpose and intent...”*

The RA-2/DC zone permits institutional and semi-public uses, and the proposal maintains surrounding area’s low-scale, predominantly residential character while preserving the building’s historic integrity.

- *“...not tend to affect adversely...”*

Since 1997, the NBA has maintained a low-intensity presence limited to business hours with no commercial traffic or deliveries, and the proposed third-story addition is compatible with the area’s character without affecting neighboring light or air.


- *“...meet such special conditions”*

Apart from the minimum 10,000 square-foot (GFA) requirement, the requested special exception satisfies all conditions in Subtitle U § 203.1(o).



# Variance

## Justification



Prong of Variance Test	Justification
<p><i>"...the property is affected by exceptional, size, shape, or topography or other <b>extraordinary or exceptional condition or situation...</b>"</i></p>	<p><b>Confluence of Factors:</b></p> <ul style="list-style-type: none"> <li>• <b>Longstanding Office Use</b> – Building continuously occupied for office purposes since the 1950s; NBA lawfully in place since 1997.</li> <li>• <b>Zoning Conflict</b> – Property zoned RA-2/DC, which no longer permits office use as a matter of right.</li> <li>• <b>Nonprofit Mission Needs</b> – Relief sought to meet programmatic and operational demands, not for commercial expansion.</li> <li>• <b>Distinguishing Context</b> – These combined factors set the Property apart from others on the block and within the zone.</li> </ul>
<p><i>"...the strict application [of ZR16] would result in <b>peculiar and exceptional practical difficulties...</b>"</i></p>	<ul style="list-style-type: none"> <li>• <b>Site Constraints</b> – 2,200 sq. ft. lot, abutted on both sides, makes the 10,000 sq. ft. threshold unattainable.</li> <li>• <b>Regulatory Burden</b> – Strict application of Subtitle U § 203.1(o) would bar special exception relief and lock the use into nonconforming status.</li> <li>• <b>Modest, but Essential Addition</b> – Third story (1,172 sq. ft.) provides needed offices, conference room, and staff workspace.</li> <li>• <b>Nonprofit Need &amp; Practical Limits</b> – Relief is necessary for NBA's growth; conversion to residential use is impractical given the building's longstanding office configuration.</li> </ul>
<p><i>"...relief can be granted <b>without substantial detriment</b> to the public good and <b>without substantially impairing...</b>the Zoning Regulations and Map"</i></p>	<ul style="list-style-type: none"> <li>• <b>Longstanding, Low-Impact Use</b> – Nearly 30 years of nonprofit office operations with no adverse effects on neighbors.</li> <li>• <b>Scale &amp; Compatibility Preserved</b> – Smaller building size maintains modest scale and residential character consistent with RA-2/DC goals.</li> <li>• <b>Public Good Advanced</b> – Relief enables a mission-driven nonprofit to remain in place and continue serving underserved communities.</li> </ul>

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