



# Z.C. Case No. 23-24

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ASSISTANT ATTORNEY GENERAL

EQUITABLE LAND USE SECTION

PUBLIC HEARING – JULY 18<sup>TH</sup>, 2024

# OAG Recommends Approval

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The PUD's significant affordable housing proffer:

- advances the Comprehensive Plan's affordable housing goals to achieve an equitable and inclusive city; and
- satisfies the PUD balancing test by compensating for the added density

The Comprehensive Plan (CP)  
identifies **affordable housing** as  
the **only “high-priority”** public  
benefit in the evaluation of  
residential PUDs

(CP § 224.9)

# The CP Prioritizes Affordable Housing to Combat the District's Affordability Crisis

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- The rising cost of housing has created a “**crisis of affordability**, particularly for the District’s lowest-income residents.” (CP §§ 206.1, 500.19)
- To create and support an **equitable and inclusive city**, the District must provide “access to housing that is healthy, safe, and affordable for a range of household types, sizes, and incomes in all neighborhoods.” (CP § 219.1)

# The CP Calls for More Deeply Affordable Ownership Units

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## **More Deeply Affordable Units**

Provide ~70% of affordable units at 60% MFI or below  
(CP §§ 206.4, 206.6, 503.4, 504.7, 504.9)

## **More Affordable Ownership Units**

Provide affordable homeownership options to support long-term stability of neighborhoods and families and provide opportunities to build intergenerational wealth  
(CP §§ 512.1, 513.5, 513.7)

# The CP Calls for Affordable Family-Sized Units in Amenity-Rich Areas

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## **Family-sized units**

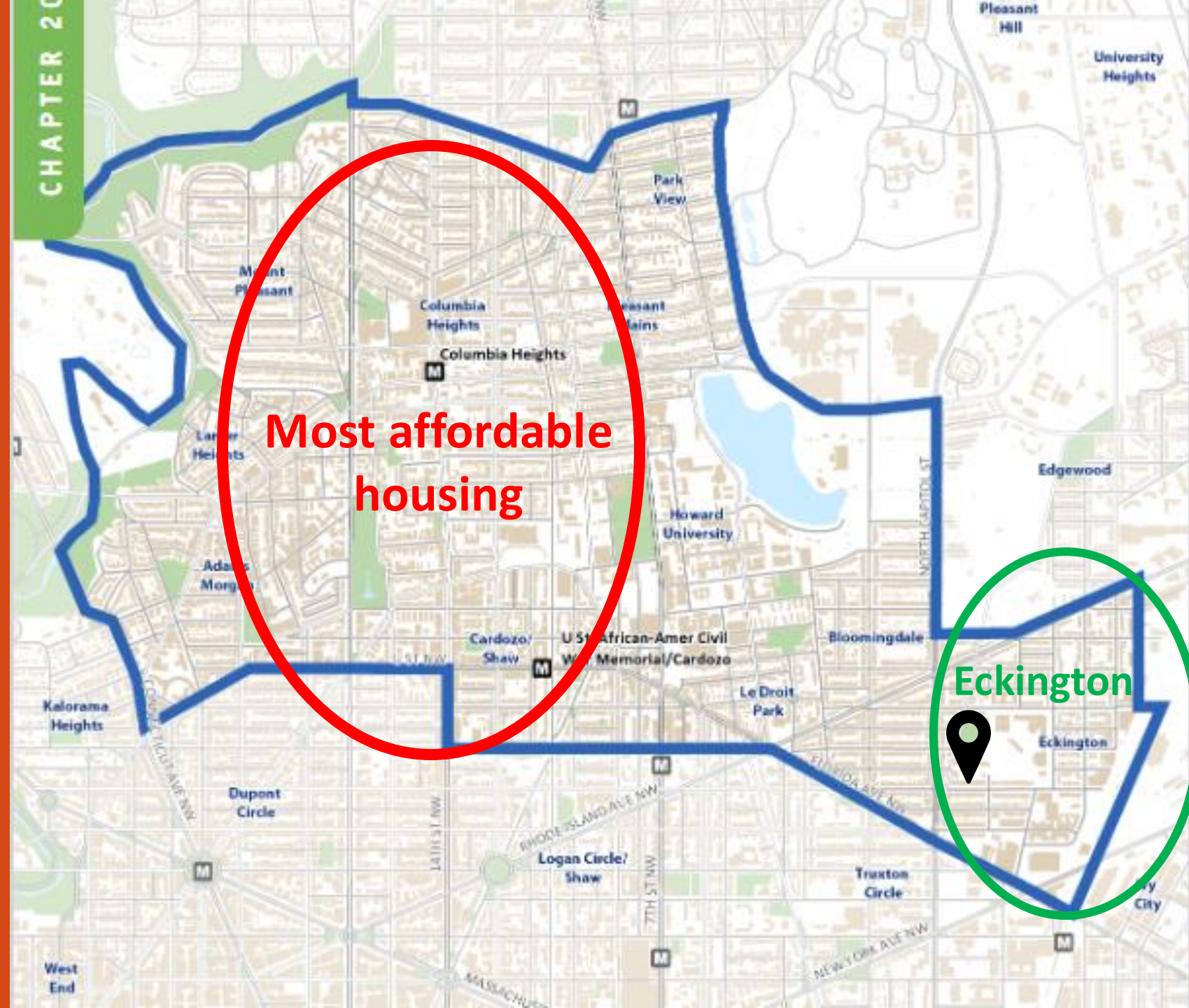
Provide 3+ bedroom units to meet need  
(CP §§ 206.1, 206.2, 219.3, 500.30, 505.8)

## **Proximity to amenities**

Provide access to transit, employment centers, schools, public facilities, recreation, and retail  
(CP §§ 503.11, 505.8)



- Most affordable housing in Mid-City is in the west (CP § 2000.6)
- SAP calls for affordable housing in Mid-City East (SAP p. 6)



# Increasing Housing in Mid-City: Challenges

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- **Less than 1% vacant land:** limited opportunities for new housing (CP § 2002.7; SAP, p. 37)
- **Declining median home size:** fewer homes with multiple bedrooms for families (SAP, p. 29)



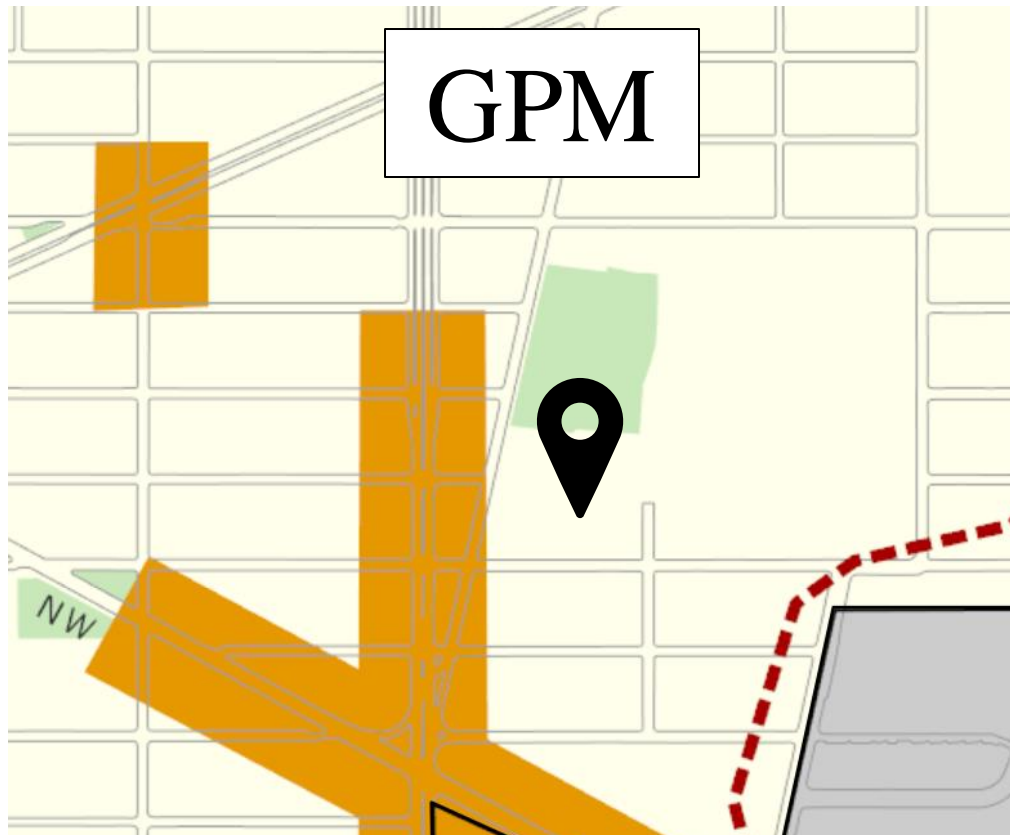
# Increasing Housing in Mid-City: Solutions

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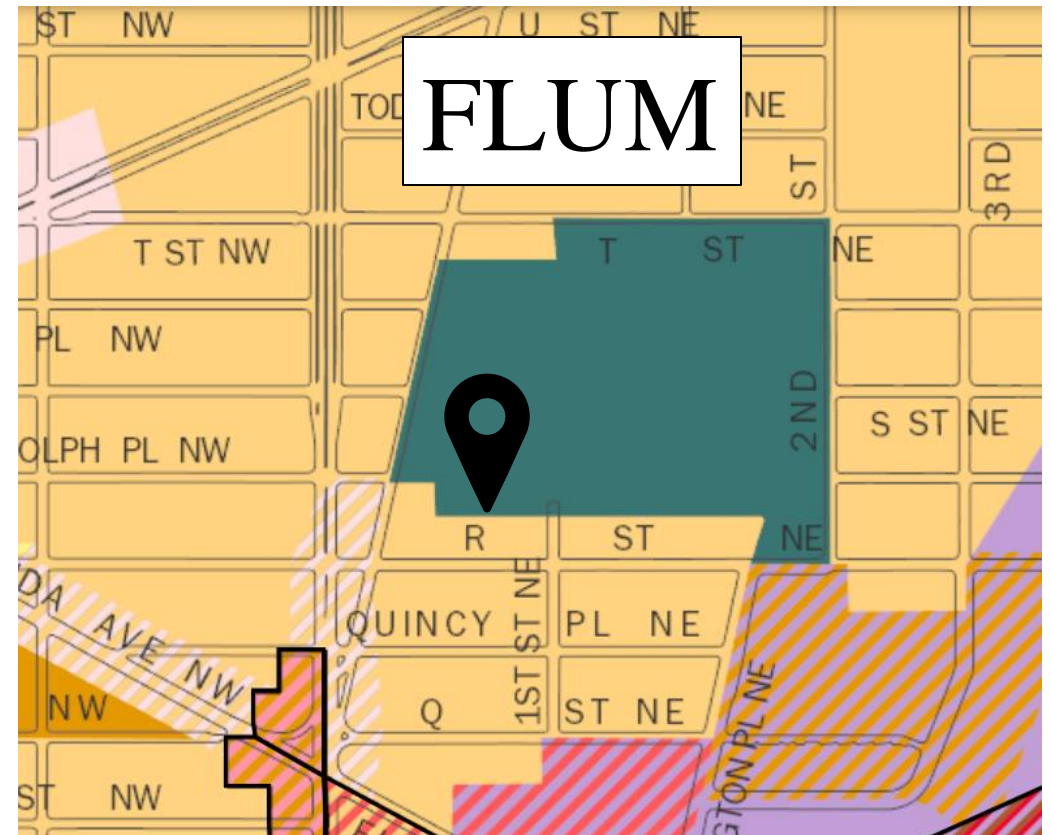
- **Increase site utilization, infill vacant parcels, and repurpose existing vacant buildings**  
(CP § 503.5; SAP p. 6, 38)
- **Utilize row house neighborhoods** to augment the mix of unit size and housing tenure (CP § 2008.6)



# CP Maps Call for Moderate Density to Support Housing



**Neighborhood Conservation Area**  
Infill housing to address city-wide  
housing needs



**Moderate Density Residential**  
Up to 2.59 FAR (with IZ & PUD bonuses)  
RA-2 zone is specifically listed as consistent

# The PUD Advances the CP's Affordable Housing Goals with Family-Sized Ownership Units

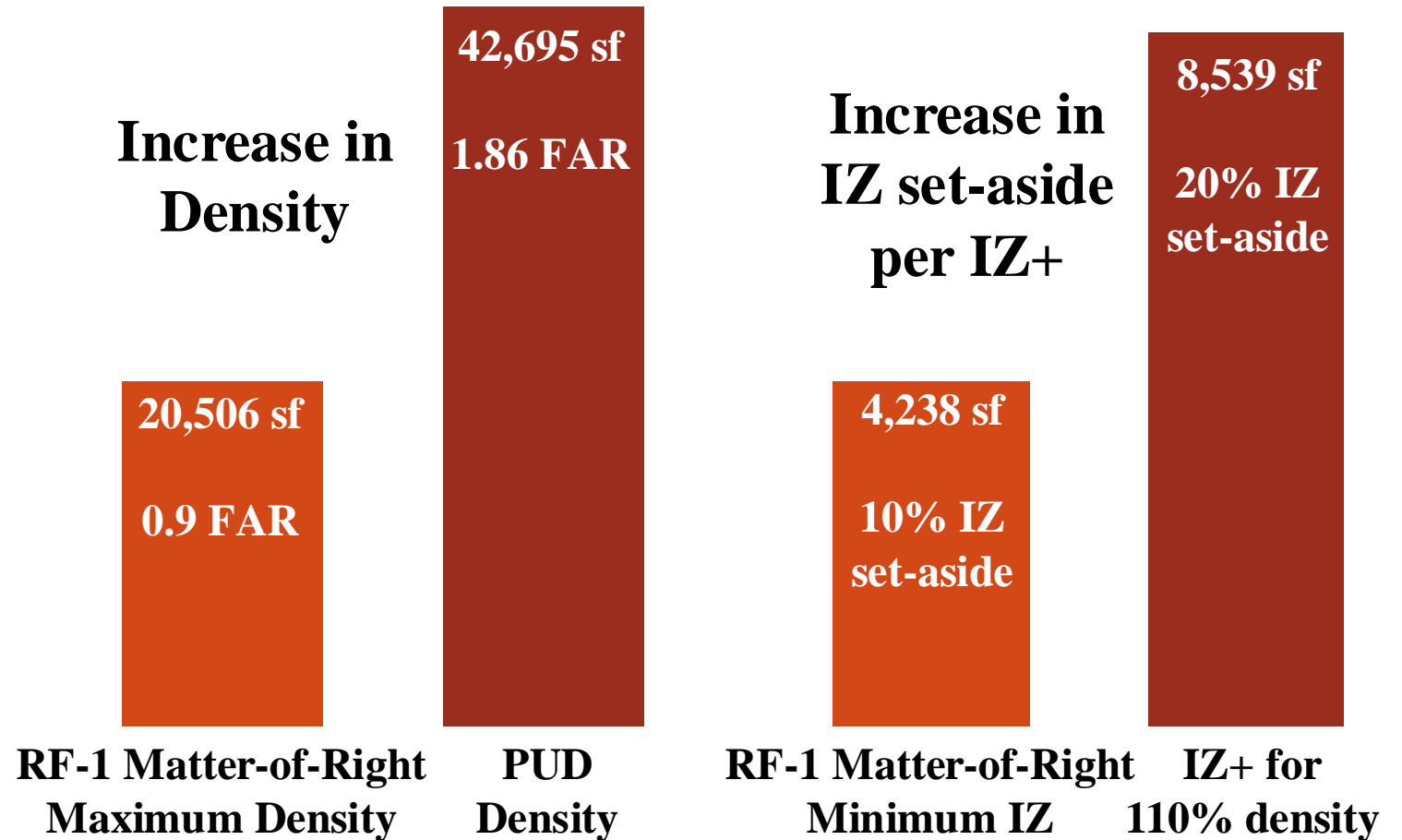
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3 IZ ownership units with 5,568 sf (13% of residential GFA)

- 2 units are more affordable (60% MFI instead of 80% MFI)
- 2 units are family-sized (three bedrooms)

# The CP Calls for Leveraging Density Increases to Create Affordable Housing

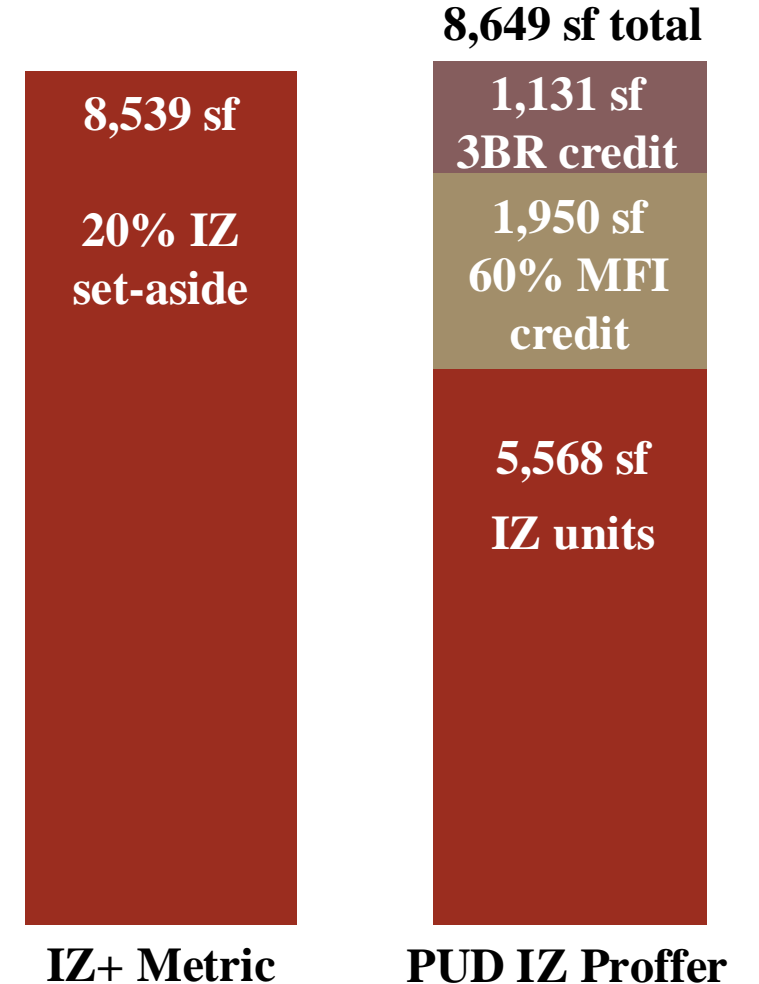
The PUD's 110% density increase would require **8,539 sf** IZ set-aside (20% of residential GFA) under IZ+ metric



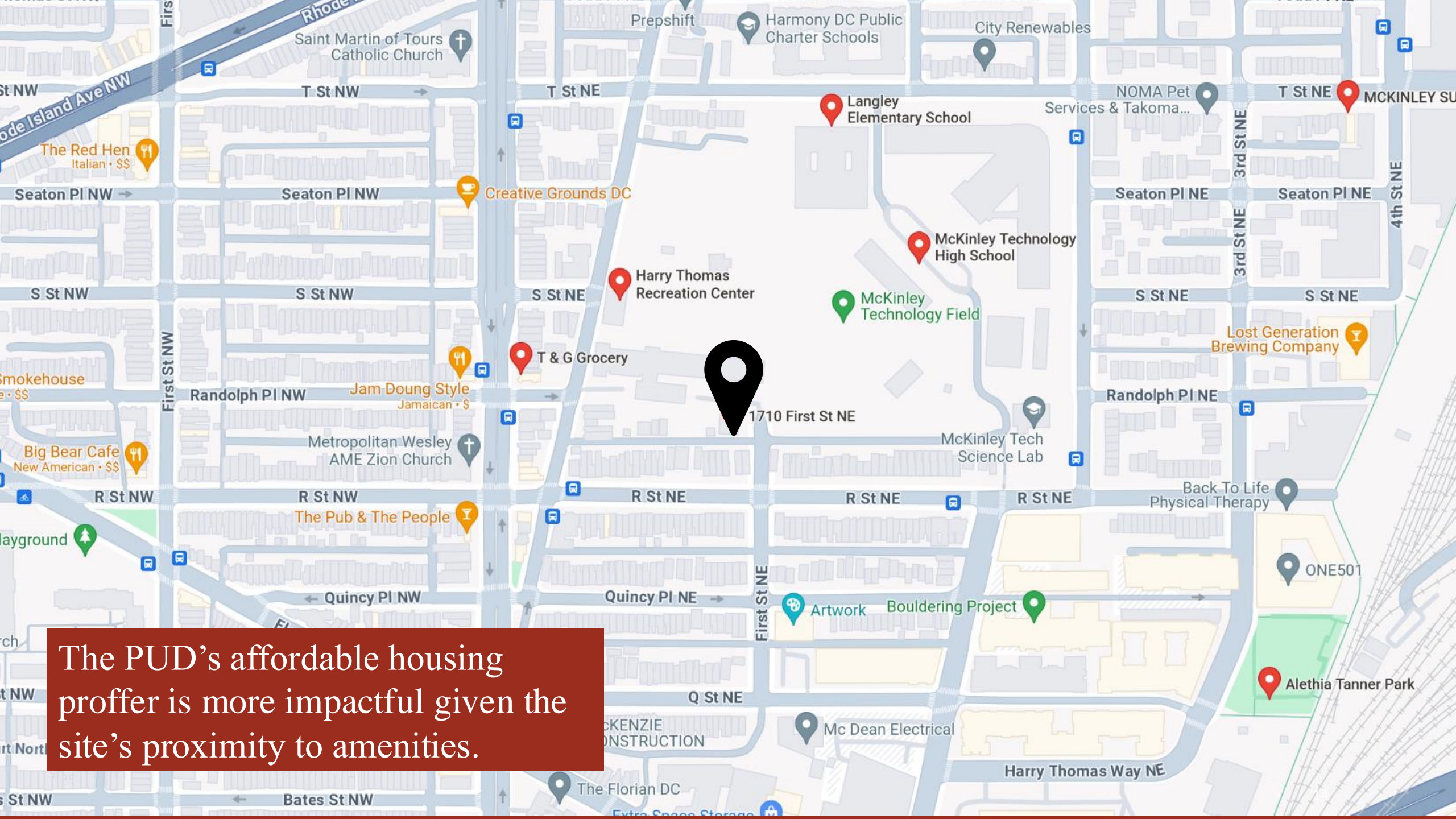
# The PUD's Affordable Housing Proffer Is Significant Because It Exceeds the IZ+ Metric

The PUD's proffer is equivalent to  
**8,649 sf** of IZ

Including credits for added benefits  
of deeply affordable and family-sized IZ  
units based on the DHCD's maximum  
purchase price table







The PUD's affordable housing proffer is more impactful given the site's proximity to amenities.

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## Public Contact Information

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