Z.C. Case No. 26-06

Testimony in Support

Noelle Wurst – Assistant Attorney General

Public Hearing – November 2, 2026

ZONING COMMISSION
District of Columbia
CASE NO. 26-06
EXHIBIT NO. 22

OAG recommends that the ZC **approve** the proposed map amendment to the D-8 zone with IZ+. The rezoning is consistent with the CP's land use maps' guidance and will advance numerous policies supporting **increased density** for housing, **affordable housing near transit**, and the **adaptive reuse** of historic and disposed properties.

Comprehensive Plan Policies



Addressing the District's Affordable Housing Crisis

Address rising housing costs, driven by rising demand, as one of "the most pressing and critical issues facing the District" resulting in a "crisis of affordability."

Use zoning processes and incentives to raise by-right height and density limits, supporting greater affordable housing set-asides.

Promote high-density, mixed-use, and mixed income development in Central Washington to create a "vibrant collection of central neighborhoods."

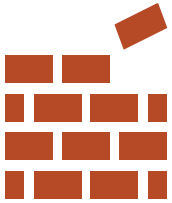
Utilize disposition of federal properties for more affordable units.



Addressing the Need for More Housing Near Transit

Locate new affordable and market-rate housing near Metrorail and Metrobus stations, which reduces transportation costs and increases affordability.

Support and enhance neighborhood-serving retail with increased pedestrian traffic.



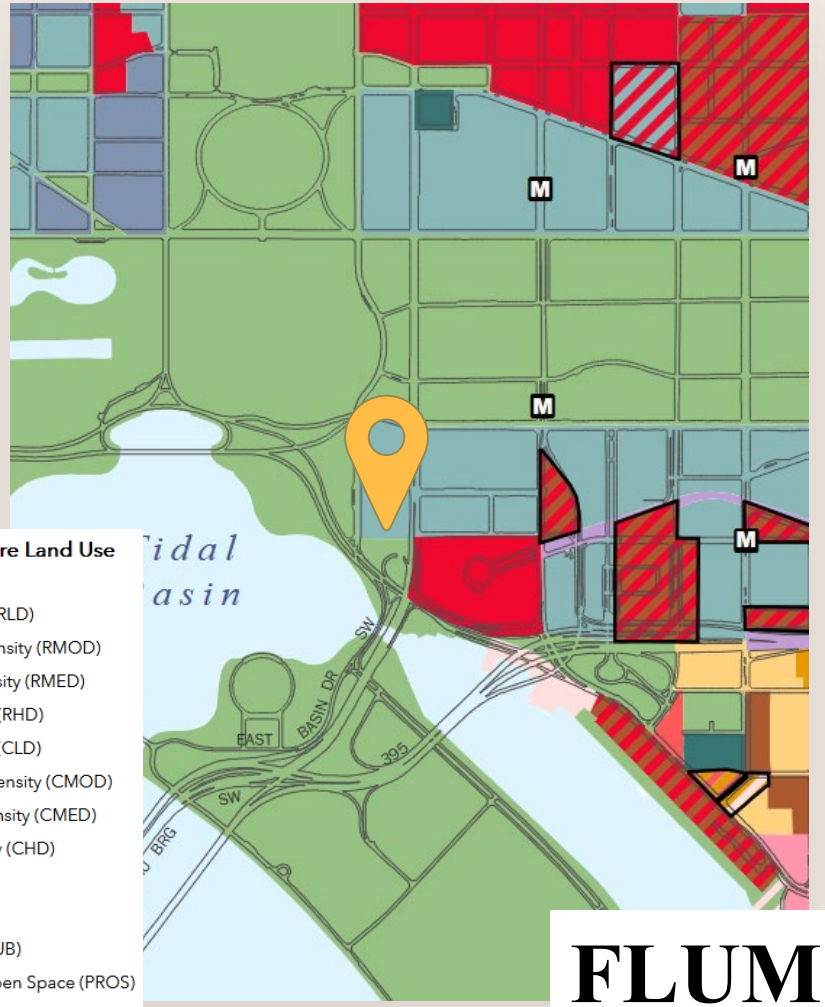
Former Federal Sites and Adaptive Reuse

Integrate former federal sites "into the surrounding fabric" of the CEA. Development should be mixed-use and mixed-income, especially to support downtown economic prosperity and vibrancy.

Reuse existing historical buildings to provide more housing generally and affordable housing alongside nonresidential uses.

Preserve the scale and character of the CEA's historic resources.

Comprehensive Plan Maps

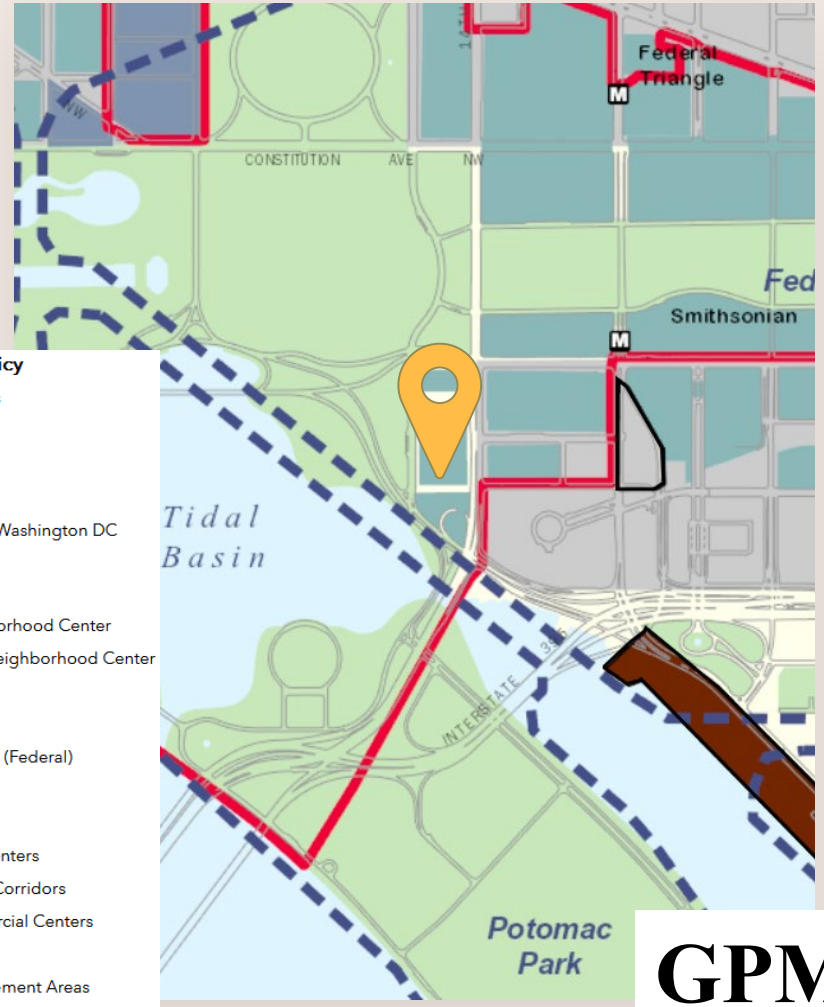


Comprehensive Plan Future Land Use

Land Use Categories

- Residential-Low Density (RLD)
- Residential-Moderate Density (RMOD)
- Residential-Medium Density (RMED)
- Residential-High Density (RHD)
- Commercial-LowDensity (CLD)
- Commercial-Moderate Density (CMOD)
- Commercial-Medium Density (CMED)
- Commercial-High Density (CHD)
- Institutional (INST)
- Federal (FED)
- Local Public Facilities (LPUB)
- Parks, Recreation, and Open Space (PROS)
- Production, Distribution and Repair (PDR)
- Water
- Mixed Uses

FLUM



Comprehensive Plan Policy

Future Planning Analysis Areas

Resilience Focus Areas

Proposed Boundary - State of Washington DC

Policy Types

- Enhanced/New Neighborhood Center
- Enhanced/New Multi-Neighborhood Center
- Institutional Uses
- Land Use Change Areas
- Land Use Change Areas (Federal)
- Federal Lands
- Regional Centers
- Multi-Neighborhood Centers
- Main Street Mixed Use Corridors
- Neighborhood Commercial Centers
- Central Washington
- Neighborhood Enhancement Areas
- Neighborhood Conservation Areas
- Water
- Parks

GPM

Liberty Loan Building's Neighborhood Context

- The property is one of several unzoned federal properties south of the National Mall that was marked for disposal and has now been sold to private owners.
- Rezoning will:
  - Advance the CP's housing and affordable housing policies by accommodating residential density in Central Washington and the CEA near key transit corridors and adaptively reusing a vacant building.
  - Streamline future development on the site, allowing matter-of-right changes and bypassing special exception review.

OAG Supports Application of IZ+



The purpose of IZ+ is to encourage affordable housing where it is needed, with exceptions possible if a planning area has already achieved its affordable housing goal.



Fully evaluating the financial, logistical, or other impacts of development constraints onsite is speculative without a project or at least hypothetical development scenarios.



The Housing Equity Report assigned the Central Washington Planning Area an interim goal of 1,040 units by 2025. The most recent data show that the planning area had produced 88.7% of its target.

OAG recommends **approving** the proposed map amendment with IZ+. Doing so will meaningfully advance the CP's vision for a more equitable and inclusive city by **streamlining future development of housing onsite** through adaptive reuse of a former and longtime vacant federal building, as well as help Central Washington achieve its affordable housing goal.