



ADAHA PROPERTIES LLC

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Washington D.C. 20002

April 21, 2006

Sharon Schellin, Acting Secretary to the Zoning Commission
Office of Zoning
441 4th Street, NW, Suite 200-S
Washington, DC 20001

#04-33

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DC OFFICE OF ZONING

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Re Proposed Inclusionary Zoning Program

Dear Ms. Schellin

We are writing in response to the request for comments on the Notice of Proposed Rulemaking, ZC Case No. 04-33 (Text Amendment — Inclusionary Zoning)

We would like to call your attention specifically to provisions, Section 2605.1 and 2605.2. As we explain below, we respectfully submit that Sections 2605.1 and 2605.2 pose unnecessary obstacles for the financing and construction of affordable housing in the District of Columbia.

In our practice of developing affordable housing, we have explored and implemented numerous financing options. One appealing model combines market-rate condominium units with affordable rental units, financed through Low Income Housing Tax Credits, and owned and operated by an experienced developer of affordable housing. Section 2605.1 precludes the use of this model. "Inclusionary units within a for-sale development may not be offered for lease." Should the inclusionary zoning program remain as drafted, we will not be able to consider this option. We respectfully request that you reconsider the impetus for Sections 2605.1 and 2605.2 to allow flexibility.

Given the limitations of staff resources throughout the City, we are very concerned regarding the timely, efficient, fair and equitable administration of this new ambitious program. How is the City going to ensure that the additional time is not going to be added to an already lengthy development process?

Know that we at Adaaha Properties have over 10 years of significant affordable housing experience in District of Columbia and Baltimore. We believe that housing should be available for all incomes and family sizes. However, we are very concerned that the legislation as proposed has significant unintended consequences that will prohibit the City from obtaining the goal of housing for everyone.

Thank you for your consideration of our concerns

Sincerely,

Cheryl P. Hamilton
Managing Principal

ZONING COMMISSION
District of Columbia
CASE NO. 04-33
EXHIBIT NO. 177