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2006 APR 24 AM 10:28

April 18, 2006

Sharon Schelling
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Government of the District of Columbia
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Washington, DC 20001

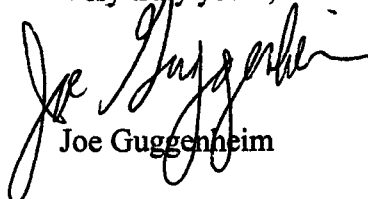
Comments on Proposed Rulemaking on Mandatory Inclusionary Zoning ZC CASE # 04-33

The affordable units provided in this ordinance for low income households defines low income as 50 percent of area median income. The latest figures from U.S. Dept. of HUD show that 50 percent of area median income in the DC metro area is over \$45,000 for a family of four persons, and the low income rent for a two bedroom unit, based on the typical standard of 30 percent of income for rent, is in excess of \$1,000 a month. This is not anywhere near the incomes and rent levels that any fair minded commentator would consider to be associated with low income households, even in the high income DC area.

The program should be adjusted so that the affordable units include 25 percent of the units at 30% of area median income, 35 percent of units at 50% of area median income, and 40 percent of units at 80% of area median income. This would bring some rents down to about \$600 a month, serving households with incomes of \$27,000 year, which is much closer to what would be considered low income. If necessary this can be accomplished without an additional financial burden for developers by slightly lowering the percentages of the matter of right and achievable bonus densities that have to be allocated to affordable housing.

Additionally, owners should be required to accept housing vouchers to reach households with incomes of about \$20,000 and below for about 20 percent of the affordable units. The fair market rents will provide owners with rental income from the vouchers that is within the range of the targeted rents required above, and would be counted towards the affordability requirement at the rental income level received by the owner for the units with vouchers, so that this should not lead to any further loss of any rental income for the property owner.

Very truly yours,


Joe Guggenheim

ZONING COMMISSION
District of Columbia
CASE NO. 04-33
EXHIBIT NO. 179

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