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April 19, 2006

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

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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 one provision, Section 2605.1. As we explain below, we respectfully submit that Section 2605.1 poses 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 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 a non-profit experienced in 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 Section 2605.1.

Sincerely,

Patrick Sheridan
Vice President
Real Estate Development

ZONING COMMISSION
District of Columbia
CASE NO. 04-33
EXHIBIT NO. 184

cc Anthony Williams, Mayor
Linda Cropp, DC Council Chair
Stan Jackson, Deputy Mayor for Planning and Economic Development

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