

ALLAN BIRNDORF & ASSOCIATES

Ms. Sharon Schellin, Acting Sec'y
Zoning Commission
DC Office of Zoning
441 Fourth St. , NW , #200 South
Washington DC, 2001

5225 Pooks Hill Road, Suite A22 South, Bethesda, Maryland 20814
Tel (301) 530-5699 Fax (301) 530-5740

Allan S Birndorf

Re: Proposed Rulemaking
Zoning Case No. 04-33
Text Amend/Inclusionary Zoning

Dear Ms Schellin,

Origination of multifamily rental housing for below market rate and market rate residents has been the business I am in. My career got a jump start from the Ford Foundation sponsored Housing Specialist Training Institute held in DC in the years 1969-1970.

The LIHTC (9% and 4%) have successfully produced thousands of units nationwide for low and moderate income residents. The mixed income 4% tax credit has also produced market rate rental units including rental housing units for work force residents Anyone on the production end of this business knows how intricate and detailed the programs are and how despite the intricacies it has been a successful production program Any terms and conditions the bill would impose on housing to be FHA insured or LIHTC supported or both such as density or size inclusivity or longevity period extension are unacceptable. "If it ain't broke don't fix it !" Do not encumber the FHA insured or LIHTC supported projects , do not apply any of the provisions of the legislation to such projects I believe such action will impede not advance the production of inclusive housing in the District

The LIHTC program and more recent FHA insured developments are not distinguishable from any other attractive rental projects they are compared with One would not want to exclude them from any neighborhood in the City New imposition of AMI percentages to apply to hi-rise or stick built construction should not apply to the aforementioned either. Once again: "if it ain't broke; don't fix it"!

If the multifamily rental project (or coop) is FHA insured and/or is subject to LIHTC then it should be exempt from any provision of the proposed bill as the application of these bill provisions appear to be detrimental and harmful to already successful below market rate and market rate (work force) rental multifamily production programs

I urge your serious consideration of the abovementioned comments in your deliberations. Thank you.

Sincerely yours,



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District of Columbia
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