



October 21, 2010

Anthony Hood, Chair
D C. Zoning Commission
441 Fourth Street, SW Suite 220-South
Washington, DC 20001

Re. Case No 04-33D – Inclusionary Zoning Exemption for Federal and District Funded
Affordable Housing Development

Dear Chairman Hood and Members of the Commission:

NCB Capital Impact is a national nonprofit organization with a mission of helping people and communities reach their highest potential at every stage of life. We were originally based in the District and have worked on affordable housing issues in the District throughout our 30 year history, particularly limited equity housing cooperatives.

Currently we are funded by the Ford Foundation to assist communities throughout the United States to enhance their homeownership programs so that they preserve long-term affordability and community stability. We seek to help more hard-working people buy homes today, maintain those homes and keep them affordable in the future.

We are strong supporters of the District of Columbia Inclusionary Zoning Program. We commend the Commission for this program that recognizes the inherent value of preserving long-term affordability. We are sympathetic to the concerns raised by the Department of Housing and Community Development (DHCD) about the conflicts that have arisen between pre-existing rules and the inclusionary zoning rules. Adjustments to Section 2640 are in order so that current affordable projects may proceed without creating any inference of noncompliance because of inclusionary zoning rules.

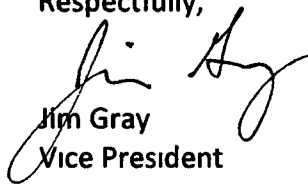
However, we also firmly believe that DHCD's concerns can be adequately addressed by applying the inclusionary zoning rules after the expiration of other affordability requirements. The strength of the DC inclusionary zoning program is its long-term affordability. Limiting resale restrictions for only 15 and 30 years would eviscerate this key purpose of the inclusionary zoning program. We encourage the Commission to preserve the essential purpose of the program so that the District can begin to develop a stock of permanently affordable homeownership that will keep its communities inclusive and vibrant. Adequately maintained and monitored, this permanent stock of affordable homeownership will provide wealth building opportunities to many future generations of hard working Washingtonians.

ZONING COMMISSION
District of Columbia

ZONING COMMISSION
District of Columbia
CASE NO. 04-33D
EXHIBIT NO. 10

Thank you for considering our comments.

Respectfully,

A handwritten signature in black ink, appearing to read "Jim Gray", is written over the printed name and title.

Jim Gray
Vice President