DISTRICT OF COLUMBIA GRASSROOTS EMPOWERMENT PROJECT

EMPOWER DC

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EMPOWER DC
ORGANIZING COMMUNITY POWER

October 28, 2013

DC Zoning Commission
c/o DC Office of Zoning
441 4th Street NW, Suite 200S
Washington, DC 20001

Re: The DC Zoning Rewrite; Updating DC's Zoning Regulations;

To the District of Columbia Zoning Commissioners:

We understand that DC Zoning Regulations govern DC's Inclusionary Zoning program ("IZ"), an important program meant to create new affordable units in a city where there is a significant need for such housing – as noted in the city's own planning documents.

However, the "affordability" of Inclusionary Zoning (IZ) units is not adequate to meet the needs of the vast majority of District residents who require affordable housing. We suggest modifying the requirements to better serve District residents.

Our recommendations follow:

1) **Utilize the District's Median Family Income (DCMFI), not the Area Media Income (AMI) as defined by HUD, to define eligibility for IZ units.**

AMI includes the incomes of wealthy outlying counties such as Montgomery County, MD and Fairfax County, VA – two of the wealthiest counties in the country. The IZ program is exclusive to the District of Columbia and meant to serve DC residents, and therefore it is inappropriate to skew eligibility criteria by using the AMI.

Alternately, the District Median Income is available as a standard also defined by HUD. The District's Median Family Income for FY 2013 is reported as $87,400, compared to the AMI for 2013 of $107, 300. See attachments for the District Median Family Income and Area Median Income charts.

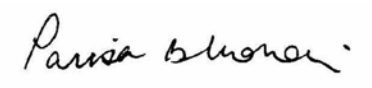
2) **Require more IZ units to be constructed in new developments**

Currently DCMR 11-2603.1 & 11-2603.2 set the percentages of the square footage of any new development that must be dedicated to IZ units.

Given the bonus density granted to the developer and given the aforementioned affordability crisis, the required IZ percentages must be doubled; IZ currently requires 8-10% of residential density in a new development → we must amend this to **18-20%** in order for the City to meet its housing goals.

These amendments will support the Zoning Commission in doing its part to address DC's affordable housing crisis.

Thank you for the opportunity to submit these comments for the record,



Parisa B. Norouzi
Executive Director
Empower DC

ATTACHMENTS:

1) District Family Media Income, 2013

FY 2013 STATE INCOME LIMITS — PAGE 1

STATE	PROGRAM	1 PERSON	2 PERSON	3 PERSON	4 PERSON	5 PERSON	6 PERSON	7 PERSON	8 PERSON
		INCOME LIMITS							
DISTRICT OF COLUMBIA									
FY 2013 MFI: 82400	30% OF MEDIAN	15750	18000	20200	22450	24250	26050	27850	29650
	VERY LOW INCOME	26250	30000	33750	37500	40500	43500	46500	49500
	LOW-INCOME	41950	47950	53950	59950	64750	69550	74350	79150

[1]

2) Area Median Income, 2013

District of Columbia

FY 2013 Income Limit Area	Median Income	FY 2013 Income Limit Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
District of Columbia	$107,300	Very Low (50%) Income Limits	$37,600	$42,950	$48,300	***$53,650***	$57,950	$62,250	$66,550	$70,850
		Extremely Low (30%) Income Limits	$22,550	$25,800	$29,000	***$32,200***	$34,800	$37,400	$39,950	$42,550
		Low (80%) Income Limits	$46,750	$53,400	$60,100	***$66,750***	$72,100	$77,450	$82,800	$88,150

[2]

[1] http://www.huduser.org/portal/datasets/il/il13/State_Incomelimits_Report.pdf

[2] http://www.huduser.org/portal/datasets/il/il2013/2013summary.odn