

Introduction

The District of Columbia Housing Authority (“DCHA”) previously redeveloped a dilapidated DCHA public housing project, in part with funds from the federal HOPE VI program, in the Capital Gateway neighborhood of D.C. This redevelopment resulted in two projects: a 151 unit senior apartment building and a mixed-income residential community consisting of single-family, semi-detached, and rowhomes. The D.C. Zoning Commission (“Commission”) approved this redevelopment through the Planned Unit Development (“PUD”) process (ZC 02-04 and ZC 03-03/02-05, 03-03A, 03-03B).

Today, DCHA owns two vacant sites in the Capital Gateway neighborhood that it would also like to redevelop through the PUD process. These sites are located along the north frontage of East Capital Street and divided by 58th Street (“East Capital Street and 58th Street, NE”). The sites are zoned R-2 and R-5-A (residential) and spans 11.9 acres, or 521,724 square feet. This site is identified as Squares 5276, 5272, 5277, and 5246. DCHA formed a partnership with an affiliate of A&R Development Corporation (“A&R”) known as CG Marketplace, LLC. CG Marketplace, LLC (“Applicant”) has filed a consolidated PUD application (“PUD application” or “proposal”) with the Commission because it seeks to develop the site in a way not permitted under the current zoning. The Applicant has proposed several buildings on this site, including a 135,551 square foot Walmart; a mixed-use building; and over 800 parking spaces. The Commission’s approval of this PUD, which would change the zoning to C-2-A (commercial), is necessary for the Applicant to proceed with this development. The proposal is located in Advisory Neighborhood Commission (“ANC”) 7C.

Argument

The Zoning Commission should reject the Applicant's PUD application because it fails to meet all of the PUD Evaluation Standards. *See* District of Columbia Municipal Regulations ("DCMR") § 11-2403. "[T]he applicant shall carry the burden of justifying the proposal[.] Failure of groups or persons to appear in opposition shall not relieve the applicant of the responsibility of demonstrating the merits of the application." DCMR § 11-2407.6. The Applicant cannot carry this burden because its proposal fails to fulfill Sections 11-2403.12, 11-2403.6, 11-2403.4, 11-2403.9, and 11-2403.10 of the DCMR as required for PUD approval.

DCMR § 11-2403.12

As a procedural matter, the Applicant's PUD application is legally defective. A PUD application must include an annotated table that shows "how the public benefits offered are superior in quality and quantity to typical development of the type proposed and the duration of the operational or grant programs." DCMR § 11-2403.12. The Applicant's PUD Application fails to include any table demonstrating such superiority in the proposal's public benefits compared to the typical development of the same type. This reason alone requires that the Commission reject the Applicant's proposal.

DCMR § 11-2403.6

The Applicant's PUD application also fails substantively. Among the PUD Evaluation Standards, Section 11-2403.6 provides:

Public benefits are superior features of a proposed PUD that benefit the surrounding neighborhood or the public in general to a significantly

greater extent than would likely result from development of the site under the matter-of-right provisions of this title.

(emphasis added). The Applicant cannot satisfy this provision as it relates to the surrounding neighborhood or the public in general. A central problem with the PUD application that renders it unable to meet this provision is that, with the exception of the proposed Walmart, the proposal is, effectively, incomplete. The proposal is incomplete for four reasons, explained in greater detail below: (1) the restaurant operator is unknown; (2) the Applicant eliminated the office building component of the proposal; (3) the Applicant has altered the mix of affordable units in the residential/retail building; and (4) the lack of any comprehensive analysis of how the proposal meets the requirements to secure the special exceptions it has requested related to the retail uses of the mixed-use building. Accordingly, the proposal precludes the Commission from accurately assessing the costs and benefits of the proposal for the purpose of determining whether its public benefits are significantly greater than that which would likely stem from the site's existing matter-of-right provisions.

The Restaurant

With respect to the restaurant, the Applicant states that “[i]t is important to note that the future restaurant operator/tenant is unknown at this time.” Supplemental Prehearing Statement of the Applicant (“Supplemental Statement”) at p. 8. That no restaurant operator has been identified reflects that not only in the past, but also looking to the future, there is little if any market for a restaurant at this site. This circumstance would indicate a likelihood that the proposed restaurant will never be built.

Even if a future restaurant operator sought out this location, the requirements to accommodate this operator are unknown. As indicated in its Supplemental Statement, “[t]he Applicant anticipates that the restaurant tenant might want to make adjustments to the approved PUD plans in order to accommodate its operations. . . . [T]he Applicant is requesting flexibility to permit the restaurant operator to make minor adjustments to the approved plans. . . .” *Id.* In response, the DC Office of Plan (“OP”) found that “the flexibility requested leaves room for a wide interpretation of what is a minor modification. OP therefore recommends that if changes are proposed, a modification request be submitted at such time.” OP’s Hearing Report dated June 10, 2013 (“Hearing Report”) at pp. 1-2. The Applicant’s desire for flexibility in construction of the restaurant casts further doubt on the feasibility of a restaurant at this site.

Office and Mixed-Use Buildings

Additional changes (on top of previous changes) to the proposal that have occurred within just the past few months -- producing uncertainty with regard to the proposed public benefits -- further preclude the Commission’s ability to compare these benefits to the public benefits permitted from the existing zoning. When the Applicant first submitted its application to the Commission on August 28, 2012, it indicated that “[w]hile the Applicant and the City would like to include additional multi-family residential and even office components on the PUD Site, that plan is still not feasible at this time.” Application to the Commission dated August 28, 2012 (“Original Application”) at p. 3. However, in less than six months, by February 4, 2013, the Applicant determined that there was now a market for both office space and multi-family

residential.

In its revised application to the Commission, the Applicant proposed a 21,900 square foot office building. The Applicant stated:

The proposed office building has been designed as a small “jewelbox” and occupies a portion of the northern edge of the PUD Site. Although it is modest in size, the office building functions as a central part of the overall arrangement and composition of the PUD Site, and is sited in a way that allows it to be seen from all major entrances to the PUD Site, and to participate on an equal footing with the larger buildings onsite.

Revised Application to the Commission dated February 4, 2013 (“Revised Application”) at p. 13. Nevertheless, when it submitted its Supplemental Statement to the Commission on May 31, 2013 (“Supplemental Statement”), the Applicant changed its proposal for a third time, eliminating the office building component from its proposal altogether.

Similarly, the proposal’s residential component changed during this time period. The first application from August 28, 2012 did not include residential. Then, the Applicant proposed a mixed-use, residential and retail building as part of its February 4, 2013 Revised Application. This building included approximately 298,216 square feet of gross floor area dedicated to residential uses, which would provide for approximately 283 residential units (plus or minus 10%), and approximately 23,962 square feet dedicated to retail uses. Revised Application at pp. 1-2, 27. Because this building was subject to the District of Columbia’s inclusionary zoning requirements, the Applicant was required to devote 10% of the residential units to affordable housing; the remaining 90% of units would be market-rate. Among the affordable units, the Applicant stated that half “will be set aside for eligible low-income households, (i.e., families earning up to 50% of the Area

Median Income), and the remaining half of the affordable units will be set aside for eligible moderate-income households (i.e., families earning up to 80% of the Area Median Income [(“AMI”)]).” *Id.* at p. 27. Subsequent to the date of this proposal, however, the Applicant altered the mix of affordable units. Instead, the Applicant proposed in its Supplemental Statement to designate all of the units at 60% of AMI. Supplemental Statement at p. 10. In so doing, the Applicant explained that “the residential units will be financed through a Low Income Housing Tax Credit (“LIHTC”) financing offering, and thus the Project is exempt from the Inclusionary Zoning requirements pursuant to Section 2602.3(f) of the Zoning Regulations.” *Id.*

Moreover, the proposed retail component of this building is problematic. The Applicant has yet to find any retailers to occupy the retail portions of the building. *See* Revised Application at pp. 20-21 (acknowledging that the Applicant is still in the marketing phase of leasing this space). At the same time, the Applicant is seeking a special exception “pursuant to Section 712.1 and Section 733.1 of the Zoning Regulations in order to enable [it] to potentially lease a portion of the retail space to a tenant type such as FroZen Yo, Panera Bread, Starbucks, or similar tenants if such retailers express interest in the space once this building is comp[leted].” *Id.* at p. 21. Yet as OP reported to the Commission on June 13, 2013, “the Applicant has not yet provided a comprehensive analysis of the requested special exceptions requirements. . . .” Hearing Report at p. 1. The absence of said analysis as a basis for granting the Applicant its requested special exceptions constitutes additional evidence that the proposal is incomplete.

The phasing of this proposal corroborates that the PUD is effectively incomplete. The PUD's first phase "includes the building pad for WalMart, all associated infrastructure work . . . and vertical construction of WalMart." Revised Application at p. 21. The PUD's second phase "includes construction of the mixed-use building, restaurant, and all associated sidewalks, parking lots, the urban plaza, and associated hardscape and landscaping features." *Id.* The third phase had included "construction of the office building, parking area, urban court, and associated hardscape, landscape, and sidewalk improvements," but the Applicant eliminated the proposal's office building component. That the proposed Walmart is scheduled to be built prior to the remaining proposed development indicates that Walmart is the only reliable component of this PUD application.

For all of these reasons, the proposal fails to identify the public benefits in a way to facilitate a valid evaluation of whether such benefits are significantly greater than those likely to accrue under the site's existing zoning. Since this evaluation is not possible, the Applicant cannot meet its burden under Section 11-2403.6 of the DCMR.

Affordable Housing

Even if the Commission accepted all of the assumptions on which the Applicant relies in arguing for its proposal, the proposed public benefits are not significantly greater than that which would stem from development permitted under the existing zoning. The Applicant posits that affordable housing would be the single greatest benefit for the area of the proposal. *See* Revised Application at p. 27. Nevertheless, the proposed rents for the residential units would prove unaffordable to the vast majority of residents who live

in the area of the proposal, located in the 20019 zip code. Within this zip code, the median household income is \$34,233. *See* Selected Economic Characteristics, 2007-2011 American Community Survey 5-Year Estimates, U.S. Census Bureau, attached herein as Exhibit A at p. 2. According to the DCMR, affordable housing is defined as “housing where the occupant is paying no more than thirty-five percent (35%) of gross income for gross housing costs, excluding utility costs.” DCRM § 11-2499.2. Thus, a household earning the median income in this area can afford to commit \$11,981.55 of its yearly income to housing costs, or \$998.46 per month. This amount cannot pay for the monthly rent the Applicant has advertised for the residential units, including “\$1,120 for studio/efficiency units, \$1,209 for one bedroom units, and \$1,452 for two bedroom units.” Supplemental Statement at p. 10. Indeed, these rates exceed the current rental rates for the area, which average “approximately \$925 per month for a one bedroom apartment . . . and \$1,170 per month for a two bedroom apartment.” *Id.* at p. 11. Consequently, the Applicant cannot argue that the proposed new housing will benefit this community.

The lack of affordable housing to neighborhood residents is especially notable since the land for the proposal is publicly owned by DCHA. Indeed, it is the policy of the District of Columbia to [r]equire that a substantial percentage of the housing units built on publicly owned sites, including sites being transferred from federal to District jurisdiction, are reserved for low and moderate income households.” District of Columbia Comprehensive Plan, Citywide Elements, Housing, Policy H-1.2.4.

Neighborhood residents of low income are unlikely to afford a substantial number, let alone any, of the proposed units, in violation of this policy. This scenario also deviates from DCHRA's original vision for housing on this land. *See* Zoning Commission Hearing Transcript ("Transcript") dated April 8, 2013 at p. 62.

On the other hand, the Applicant may still argue that the proposed rents would prove affordable for individuals earning 60% of AMI based on the AMI for the District of Columbia as a whole. But at best a third of the population of this area (and at worst, considerably less) would benefit from the proposal's residential component according to this metric. *See* Exhibit A at p 2. What is more, regardless of whether the Commission considered the effect of the proposed public benefits to the surrounding neighborhood or the public in general, these benefits would be available under the site's existing zoning. Therefore, the Applicant cannot satisfy the test for public benefits under Section 11-2403.6 of the DCMR.

DCMR § 11-2403.4, § 11-2403.9, §11-2403.10

Nor can the Applicant meet all of the criteria outlined under Sections 11-2403.9 and 11-2403.10 of the DCMR. "A [PUD] project may qualify for approval by being particularly strong in only one or a few of the categories in §2403.9, but must be acceptable in all proffered categories and superior in many." DCMR § 11-2403.10. Under this Section, the proposal fails to demonstrate that the proposal (1) "substantially advances the major themes and other policies and objectives of any of the elements of the Comprehensive Plan;" (2) employs "efficient and economical land utilization;" and (3) implements "effective and safe vehicular and pedestrian access, transportation

management measures, connections to public transit service, and other measures to mitigate adverse traffic impacts.” DCMR § 11-2403.9(j)¹, § 11-2403.9(b), and § 11-2403.9(c).

Comprehensive Plan

The proposal is inconsistent with the Comprehensive Plan (“Plan”) because it conflicts with the goal of Policy FNS-2.3.1 in the Far Northeast & Southeast Area Element of the Plan, which seeks to:

Leverage the development of Capitol Gateway Estates to achieve additional reinvestment in the Northeast Boundary neighborhood, particularly the rehabilitation of existing housing and the development of new mixed income family housing on vacant lots.

(emphasis added). The proposal fails at this goal because the residential component lacks mixed income family housing. As discussed previously, only households earning 60% of AMI could afford units in this building. Consequently, households earning significantly less, which constitute a majority of residents in the 20019 zip code, will be unable to afford in these units. And as previously discussed, the lack of affordable housing to low income residents in this neighborhood violates Policy H-1.2.4: Housing Affordability on Publicly Owned Sites. At the same time, because this housing is geared towards only one segment of the population, it will fail to attract residents at the highest ends of the income spectrum.

¹ This criterion is reinforced by DCMR § 11-2403.4, which states: “The Commission shall find that the proposed PUD is not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site.”

Efficient and Economical Land Utilization

The proposal also does not employ “efficient and economical land utilization.” DCMR § 11-2403.9. The lack of such utilization is reflected in a number of ways. First, in terms of parking spaces, “[v]ehicular parking exceeds zoning requirements and peak parking demand.” District of Columbia Department of Transportation Memorandum (“DDOT Memorandum”) dated June 10, 2013 at p. 1. Second, as Vice Chair Cohen observed, the Walmart building “looks like a boxcar train. And I just think it needs to have some either embellishment or some rationale why it has to look like a blank -- a long blank wall or a box car.” Transcript at p. 64. Although the Applicant has attempted to make some modifications to the design of this building, the building’s core structure remains and it prohibits smaller retailers from establishing a presence within ancillary space along the building. Third, the west wall is problematic. Commissioner May remarked that “the west wall . . . is not well developed. . . . [I]t’s a visual feature, exclusively, at this point. And then, beyond it is a fairly long, blank wall, that is only articulated by scuppers and downspouts. So it -- there needs to be some attention to what that’s going to look like. Because I wouldn’t want that to be a completely blank wall.” *Id.* at p. 69. And fourth, the proposed restaurant is in a stand-alone, rather than part of a mixed-use, building.

Unmitigated New Traffic Impacts

Finally, the proposal “will generate a significant number of new vehicle trips to the area impacting study intersections.” DDOT Memorandum at p. 1. Despite this increase, the Applicant fails to facilitate “effective and safe vehicular and pedestrian

access” and “mitigate adverse traffic impacts.” DCMR § 11-2403.9(c). The Applicant concedes that the proposal is projected to cause unacceptable traffic conditions during one or more peak hours in the following locations: intersection of East Capitol Street and 58th Street; eastbound left turn movements at the intersection of East Capitol Street and 61st Street; intersection of East Capitol Street and Southern Avenue; intersection of East Capitol Street and 55th Street; intersection of Southern Avenue and Davey Street; intersection of Central Avenue and Central Avenue; and intersection of East Capitol Street and 59th Street. *See Applicant’s Traffic Impact Study, Executive Summary, at p. vii.* Yet the Applicant has only proposed mitigation strategies where East Capitol Street intersects with 58th Street, 61st Street, and Southern Avenue. *Id.* As a result, the Applicant fails to ensure that the traffic the proposal generates will be both manageable and safe.

Conclusion

For the reasons stated above, the Commission should reject the Applicant’s proposal.

Respectfully Submitted,



Michael Kroopnick
Law Office of G. Macy Nelson, LLC



DP03

SELECTED ECONOMIC CHARACTERISTICS

2007-2011 American Community Survey 5-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Subject	ZCTA5 20019			
	Estimate	Margin of Error	Percent	Percent Margin of Error
EMPLOYMENT STATUS				
Population 16 years and over	38,287	+/-1,115	38,287	(X)
In labor force	23,134	+/-936	60.4%	+/-1.7
Civilian labor force	23,100	+/-940	60.3%	+/-1.7
Employed	18,531	+/-750	48.4%	+/-1.7
Unemployed	4,569	+/-508	11.9%	+/-1.2
Armed Forces	34	+/-48	0.1%	+/-0.1
Not in labor force	15,153	+/-771	39.6%	+/-1.7
Civilian labor force	23,100	+/-940	23,100	(X)
Percent Unemployed	(X)	(X)	19.8%	+/-1.8
Females 16 years and over				
Population 16 years and over	22,752	+/-848	22,752	(X)
In labor force	13,026	+/-751	57.3%	+/-2.4
Civilian labor force	13,026	+/-751	57.3%	+/-2.4
Employed	10,503	+/-630	46.2%	+/-2.2
Own children under 6 years				
Population 16 years and over	4,147	+/-591	4,147	(X)
All parents in family in labor force	2,808	+/-517	67.7%	+/-8.0
Own children 6 to 17 years				
Population 16 years and over	10,146	+/-825	10,146	(X)
All parents in family in labor force	7,587	+/-720	74.8%	+/-5.3
COMMUTING TO WORK				
Workers 16 years and over	18,164	+/-738	18,164	(X)
Car, truck, or van -- drove alone	7,826	+/-615	43.1%	+/-2.7
Car, truck, or van -- carpooled	1,634	+/-345	9.0%	+/-1.8
Public transportation (excluding taxicab)	7,737	+/-532	42.6%	+/-2.5
Walked	278	+/-115	1.5%	+/-0.6
Other means	133	+/-74	0.7%	+/-0.4
Worked at home	556	+/-206	3.1%	+/-1.1
Mean travel time to work (minutes)	36.9	+/-1.2	(X)	(X)
OCCUPATION				
Civilian employed population 16 years and over	18,531	+/-750	18,531	(X)

Subject	ZCTA5 20019			
	Estimate	Margin of Error	Percent	Percent Margin of Error
Management, business, science, and arts occupations	5,348	+/-513	28.9%	+/-2.6
Service occupations	5,213	+/-466	28.1%	+/-2.3
Sales and office occupations	4,955	+/-542	26.7%	+/-2.6
Natural resources, construction, and maintenance occupations	1,142	+/-243	6.2%	+/-1.3
Production, transportation, and material moving occupations	1,873	+/-285	10.1%	+/-1.5
INDUSTRY				
Civilian employed population 16 years and over	18,531	+/-750	18,531	(X)
Agriculture, forestry, fishing and hunting, and mining	0	+/-95	0.0%	+/-0.2
Construction	783	+/-209	4.2%	+/-1.1
Manufacturing	244	+/-91	1.3%	+/-0.5
Wholesale trade	161	+/-77	0.9%	+/-0.4
Retail trade	1,676	+/-363	9.0%	+/-1.8
Transportation and warehousing, and utilities	1,505	+/-270	8.1%	+/-1.5
Information	358	+/-152	1.9%	+/-0.8
Finance and insurance, and real estate and rental and leasing	969	+/-277	5.2%	+/-1.5
Professional, scientific, and management, and administrative and waste management services	2,924	+/-421	15.8%	+/-2.2
Educational services, and health care and social assistance	4,144	+/-418	22.4%	+/-2.1
Arts, entertainment, and recreation, and accommodation and food services	1,443	+/-273	7.8%	+/-1.5
Other services, except public administration	1,334	+/-264	7.2%	+/-1.4
Public administration	2,990	+/-367	16.1%	+/-1.9
CLASS OF WORKER				
Civilian employed population 16 years and over	18,531	+/-750	18,531	(X)
Private wage and salary workers	12,242	+/-793	66.1%	+/-2.6
Government workers	5,630	+/-467	30.4%	+/-2.5
Self-employed in own not incorporated business workers	611	+/-195	3.3%	+/-1.1
Unpaid family workers	48	+/-55	0.3%	+/-0.3
INCOME AND BENEFITS (IN 2011 INFLATION-ADJUSTED DOLLARS)				
Total households	21,258	+/-449	21,258	(X)
Less than \$10,000	3,593	+/-384	16.9%	+/-1.7
\$10,000 to \$14,999	1,988	+/-299	9.4%	+/-1.3
\$15,000 to \$24,999	2,867	+/-355	13.5%	+/-1.7
\$25,000 to \$34,999	2,394	+/-334	11.3%	+/-1.6
\$35,000 to \$49,999	3,220	+/-434	15.1%	+/-2.0
\$50,000 to \$74,999	3,410	+/-351	16.0%	+/-1.6
\$75,000 to \$99,999	1,838	+/-309	8.6%	+/-1.5
\$100,000 to \$149,999	1,216	+/-199	5.7%	+/-0.9
\$150,000 to \$199,999	484	+/-133	2.3%	+/-0.6
\$200,000 or more	248	+/-102	1.2%	+/-0.5
Median household income (dollars)	34,233	+/-1,749	(X)	(X)
Mean household income (dollars)	45,832	+/-2,037	(X)	(X)
With earnings	14,706	+/-534	69.2%	+/-2.0
Mean earnings (dollars)	51,302	+/-2,821	(X)	(X)
With Social Security	5,281	+/-345	24.8%	+/-1.5
Mean Social Security income (dollars)	10,644	+/-618	(X)	(X)
With retirement income	4,264	+/-319	20.1%	+/-1.5
Mean retirement income (dollars)	22,132	+/-1,909	(X)	(X)
With Supplemental Security Income	2,079	+/-322	9.8%	+/-1.5
Mean Supplemental Security Income (dollars)	7,505	+/-628	(X)	(X)
With cash public assistance income	2,610	+/-321	12.3%	+/-1.5

Subject	ZCTA5 20019			
	Estimate	Margin of Error	Percent	Percent Margin of Error
Mean cash public assistance income (dollars)	3,647	+/-499	(X)	(X)
With Food Stamp/SNAP benefits in the past 12 months	5,938	+/-502	27.9%	+/-2.2
Families	11,467	+/-500	11,467	(X)
Less than \$10,000	1,826	+/-322	15.9%	+/-2.7
\$10,000 to \$14,999	645	+/-173	5.6%	+/-1.5
\$15,000 to \$24,999	1,251	+/-226	10.9%	+/-2.0
\$25,000 to \$34,999	1,156	+/-214	10.1%	+/-1.8
\$35,000 to \$49,999	1,903	+/-270	16.6%	+/-2.3
\$50,000 to \$74,999	1,952	+/-276	17.0%	+/-2.2
\$75,000 to \$99,999	1,232	+/-244	10.7%	+/-2.1
\$100,000 to \$149,999	925	+/-177	8.1%	+/-1.5
\$150,000 to \$199,999	371	+/-131	3.2%	+/-1.1
\$200,000 or more	206	+/-98	1.8%	+/-0.9
Median family income (dollars)	42,344	+/-3,355	(X)	(X)
Mean family income (dollars)	53,918	+/-3,462	(X)	(X)
Per capita income (dollars)	20,011	+/-956	(X)	(X)
Nonfamily households	9,791	+/-481	9,791	(X)
Median nonfamily income (dollars)	24,771	+/-2,148	(X)	(X)
Mean nonfamily income (dollars)	34,973	+/-2,204	(X)	(X)
Median earnings for workers (dollars)	31,495	+/-1,349	(X)	(X)
Median earnings for male full-time, year-round workers (dollars)	39,892	+/-3,110	(X)	(X)
Median earnings for female full-time, year-round workers (dollars)	43,313	+/-2,453	(X)	(X)
HEALTH INSURANCE COVERAGE				
Civilian noninstitutionalized population	(X)	(X)	(X)	(X)
With health insurance coverage	(X)	(X)	(X)	(X)
With private health insurance	(X)	(X)	(X)	(X)
With public coverage	(X)	(X)	(X)	(X)
No health insurance coverage	(X)	(X)	(X)	(X)
Civilian noninstitutionalized population under 18 years	(X)	(X)	(X)	(X)
No health insurance coverage	(X)	(X)	(X)	(X)
Civilian noninstitutionalized population 18 to 64 years	(X)	(X)	(X)	(X)
In labor force	(X)	(X)	(X)	(X)
Employed:	(X)	(X)	(X)	(X)
With health insurance coverage	(X)	(X)	(X)	(X)
With private health insurance	(X)	(X)	(X)	(X)
With public coverage	(X)	(X)	(X)	(X)
No health insurance coverage	(X)	(X)	(X)	(X)
Unemployed:	(X)	(X)	(X)	(X)
With health insurance coverage	(X)	(X)	(X)	(X)
With private health insurance	(X)	(X)	(X)	(X)
With public coverage	(X)	(X)	(X)	(X)
No health insurance coverage	(X)	(X)	(X)	(X)
Not in labor force:	(X)	(X)	(X)	(X)
With health insurance coverage	(X)	(X)	(X)	(X)
With private health insurance	(X)	(X)	(X)	(X)
With public coverage	(X)	(X)	(X)	(X)
No health insurance coverage	(X)	(X)	(X)	(X)

Subject	ZCTA5 20019			
	Estimate	Margin of Error	Percent	Percent Margin of Error
PERCENTAGE OF FAMILIES AND PEOPLE WHOSE INCOME IN THE PAST 12 MONTHS IS BELOW THE POVERTY LEVEL				
All families	(X)	(X)	25.1%	+/-2.7
With related children under 18 years	(X)	(X)	34.8%	+/-4.1
With related children under 5 years only	(X)	(X)	35.6%	+/-13.3
Married couple families	(X)	(X)	3.0%	+/-2.2
With related children under 18 years	(X)	(X)	4.8%	+/-4.8
With related children under 5 years only	(X)	(X)	0.0%	+/-17.6
Families with female householder, no husband present	(X)	(X)	35.0%	+/-4.1
With related children under 18 years	(X)	(X)	41.6%	+/-5.4
With related children under 5 years only	(X)	(X)	46.3%	+/-14.6
All people	(X)	(X)	27.8%	+/-2.6
Under 18 years	(X)	(X)	41.5%	+/-5.2
Related children under 18 years	(X)	(X)	41.2%	+/-5.2
Related children under 5 years	(X)	(X)	47.0%	+/-9.0
Related children 5 to 17 years	(X)	(X)	39.4%	+/-5.4
18 years and over	(X)	(X)	21.8%	+/-2.0
18 to 64 years	(X)	(X)	22.8%	+/-2.3
65 years and over	(X)	(X)	16.8%	+/-2.6
People in families	(X)	(X)	27.3%	+/-3.2
Unrelated individuals 15 years and over	(X)	(X)	29.2%	+/-2.8

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

There were changes in the edit between 2009 and 2010 regarding Supplemental Security Income (SSI) and Social Security. The changes in the edit loosened restrictions on disability requirements for receipt of SSI resulting in an increase in the total number of SSI recipients in the American Community Survey. The changes also loosened restrictions on possible reported monthly amounts in Social Security income resulting in higher Social Security aggregate amounts. These results more closely match administrative counts compiled by the Social Security Administration.

Workers include members of the Armed Forces and civilians who were at work last week.

Industry codes are 4-digit codes and are based on the North American Industry Classification System 2007. The Industry categories adhere to the guidelines issued in Clarification Memorandum No. 2, "NAICS Alternate Aggregation Structure for Use By U.S. Statistical Agencies," issued by the Office of Management and Budget.

Census occupation codes are 4-digit codes and are based on the Standard Occupational Classification (SOC). The Census occupation codes for 2010 and later years are based on the 2010 revision of the SOC. To allow for the creation of 2007-2011 and 2009-2011 tables, occupation data in the multiyear files (2007-2011 and 2009-2011) were recoded to 2011 Census occupation codes. We recommend using caution when comparing data coded using 2011 Census occupation codes with data coded using Census occupation codes prior to 2010. For more information on the Census occupation code changes, please visit our website at <http://www.census.gov/hhes/www/oiindex/>.

While the 2007-2011 American Community Survey (ACS) data generally reflect the December 2009 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas, in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2000 data. Boundaries for urban areas have not been updated since Census 2000. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2007-2011 American Community Survey

Explanation of Symbols:

1. An '***' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '!' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '!' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An '***' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An '*****' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.