DISTRICT OF COLUMBIA BUILDING INDUSTRY ASSOCIATION

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October 31, 2014

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Zoning Commission for the District of Columbia
441 4th Street, NW
Suite 210
Washington, DC 20001

Re: Zoning Commission Case No. 14-13
Text Amendment to the Zoning Regulations.
Roof Top Penthouse Regulations

Dear Members of the Commission

On behalf of DCBIA and its members, DCBIA has sponsored the enclosed report prepared by Bolan Smart Associates that assesses certain potential economic impacts of some of the proposals contained within the advertised text and alternatives of the above-referenced case

The report is an Economic Impact Analysis which focuses on those provisions dealing with potential fees and costs of using the penthouse area. The Bolan Smart Feasibility and Economic Impact Analysis concludes that, with respect to multi-story residential buildings, continuing the existing IZ formula for additional residential roof top FAR provides some developer economic incentive to proceed with construction of residential penthouse space

In addition, the report also concludes that a 50% charge for commercial FAR at the penthouse level provides for a modest developer incentive and the report sets forth back up for both of those conclusions

Other alternatives proposed do not provide sufficient economic incentive to proceed with utilizing penthouse space

We are pleased to submit this information to the record in this case and hope that it will be helpful to the Commission in its deliberations. This report corroborates the recommendations of the Office of Planning found at paragraphs 12 and 13 of its report dated October 27, 2014, and its recommendations to the Zoning Commission

ZONING COMMISSION
District of Columbia
CASE NO. 14-13
EXHIBIT NO. 9

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We look forward to participating at the Zoning Commission public hearing scheduled for November 6, 2014.

Very truly yours,

Christopher H Collins
DCBIA Counsel

Enclosure

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1150 K STREET, NW, SUITE 1211, WASHINGTON, DC 20005 • (202) 371-1333

October 2014

Case No. 14-13
Penthouse Text Amendments
Zoning Commission for the District of Columbia

Feasibility and Economic Impact

The Washington DC based real estate economic consultancy firm of Bolan Smart Associates has been asked to provide an overview of economic issues and impacts pertaining to aspects of the proposed penthouse text amendments.

A. **Economic Feasibility**. The attached tables illustrate that for multi-story buildings requiring steel and concrete frame construction, the proposed penthouse text amendments provide a range of impacts on possible development feasibility

   1) One-for-One @ 50% AMI Residential Provisions. The proposal that the addition of penthouse residential use be replicated one-for-one with in-building affordable residential use, priced at 50% of Area Median Income (AMI), represents a very substantial developer disincentive The delta between the all-in costs and revenues of substituting a private market building unit with a 50% AMI unit is not adequately offset by the net revenues generated by adding a penthouse rooftop unit, with the losses exceeding one third of the cost of delivering the penthouse unit. In short, the presumed land value (i.e. $100 per FAR) that is conveyed to the developer at no cost with the addition of the rooftop space is not sufficient to cover both the subsidy implied in providing for the affordable unit and the extra construction costs associated with the added rooftop enclosed area. (See Table 1)

   2) IZ @ 8% Affordable and 80% AMI Residential Provisions: The proposal that the addition of penthouse residential use be subject to 8% affordable Inclusionary Zoning (IZ) provisions assuming an 80% AMI affordability pricing schedule provides for some developer incentive The delta between the all-in costs and revenues of substituting a private market building unit with an 80% AMI unit is adequately offset by the net revenues generated by an adding a penthouse rooftop unit, with potential minor developer positive gains. Based on the attached Table 2, the potential gains range are slightly positive assuming an underlying land value in the range of $100 per FAR.

3) <u>50% Assessed Land Value HPTF Payment Commercial Provisions:</u> The proposal that the addition of penthouse commercial use be subject to a payment to the Housing Production Trust Fund (HPTF) equivalent to 50% of the implied FAR land value (i e. $150 per FAR) provides for a modest developer incentive. What the attached analysis (see Table 4) indicates, however, is that if the HPTF payment were to exceed 50% of the land FAR value, the development feasibility of providing for the commercial rooftop use would quickly diminish.

3) <u>Feasibility Assumptions / Methodology</u>: There are a number of assumptions related to representing economic feasibility. Key variables and computations profiled in the attached tables include:

Land Cost	*treatment of land cost based on market FAR value and penthouse provisions*
Construction Cost	*building construction costs vary by building type ($165 to $200 / gsf) and unique penthouse elements (added 20% to 30%+) compared with the rest of the building (less efficient ratio of common areas to occupied space, less efficient exterior wall to interior space ratio, unique utility stacking requirements, need to buffer and coexist with building mechanical systems and other roof top uses, etc)*
Soft Costs	*design costs, management and overhead, fees, construction period financing, etc , also subject to premium roof top adaptation costs (added 10% to 25%+)*
Investor Requirement	*the minimum required return (one-time on total investment @ 18% to 20%) to pay for financing and cover project development economic risk*
AMI Subsidy / Offset	*cost assessed against penthouse space to meet affordable housing provision*
Operating Costs	*operating costs per square foot of added penthouse space are higher than for building averages, but for purposes of this analysis are not quantified*
Required Price	*break even price needed to cover all development costs, minimum investor yield, and AMI subsidy / offset*
Market Price.	*market price, which may vary from the required price*
Penthouse Premium	*limited due to setbacks restricting views and inclusion of other rooftop uses*
Gain / Loss:	*difference between required price and market price If there is a loss, a developer will have a <u>disincentive</u> to provide added penthouse occupiable space If there is a gain, a developer may have an <u>incentive</u> to provide for added penthouse space Given the complexity and cost factors of delivering cost effective penthouse space, a developer is likely to need to show a minimum 5% to 10% gain on all-in development costs in order to consider adding roof top occupiable spaces*

B **DC Fiscal Impact**. The combination of real estate taxes, resident income taxes or corporate taxes, retail sales taxes, and applicable other taxes and fees, generate on the order of $15 to $20 per sf per year of DC tax revenues (1) for added occupiable rooftop space (see Tables 3, 5 and 6). Were this additional District of Columbia tax related revenue to be directly deployed to underwrite investments in affordable housing, the implied new DC revenue would be sufficient to support well over $150 to $200 of added debt capacity for the District per the added sf of penthouse space (assuming for example a 6.0% annual multi-year amortization rate). This financing capacity would be in addition to the direct developer contributions to the HPTF or other support for affordable housing that would be derived from a modestly incentivized roof top penthouse use policy.

(1) While the illustrated tax revenues estimates are premised on the assumption of a 100% net new gain to the District, there is clearly a probability that even without the added penthouse uses, some latent market demand would be captured at alternative District buildings Nonetheless, the true net gain to the District consequent from expanded flexibility in using roof top penthouse space should be substantially positive (i e more that 50%), driven by the ability of the unique aspects of penthouse spaces to stimulate or capture market demand that may not otherwise have be realized in the District

Table 1
Roof Top Penthouse Residential Economic Feasibility: One-for One Affordable

#	Residential (sale or rental valuation)		Bldg Market Rate	1 for 1 Affordable	Roof Top Penthouse Unit		
2)	Assumptions			substitution of mrkt unit			
3)				50% AMI			
4)	unit size	1,000 gsf	1,000 gsf	1,000 gsf		1,000	gsf
5)	net square foot	84.0% ratio	840 nsf	840 nsf	82.0% ratio	820	nsf (less efficiency factor)
6)	land	varies	$100 / gsf	$100 / gsf		$0	/ gsf
7)	construction	$200 / gsf	$200 / gsf	$200 / gsf	130.0% of bldg	$260	/ gsf (extra one-off costs) [1]
8)	soft costs	25.0%	$75 / gsf	$75 / gsf	125.0% of mrkt	$94	/ gsf (added unique elements)
9)	investor return	18.0%	<u>$68</u> / gsf	<u>$68</u> / gsf	18.0%	<u>$64</u>	/ gsf
10)	Total Cost / SF		$443 / gsf	$443 / gsf		$417	/ gsf
11)			$527 / nsf	$527 / nsf		$509	/ nsf
12)	Total Cost Per Unit		<u>$442,500</u>	<u>$442,500</u>		<u>$417,425</u>	
13)	AMI Subsidy / Offset		$0	NA	affordable line 20	$267,500	
14)	Operating Cost Differences [2]		<u>$0</u>	<u>$0</u>	some, but not quantified		
15)	Required Unit Price		<u>$442,500</u>	<u>$175,000</u> [3]	lines 12 plus 13	<u>$684,925</u>	break even price
16)			$527 / nsf	$208 / nsf		$835	/ nsf
17)						58.6%	req premium over bldg mrkt
18)	Building Market Unit Price		<u>$442,500</u>	<u>$175,000</u>		<u>$431,964</u>	building market price / nsf
19)			$527 / nsf			$527	/ nsf
20)	Gain / Loss		$0	($267,500)	lines 18 minus 15	($252,961)	if priced at building market
21)					lines 20 div by 15	*-36.9%*	develop return over break even
22)	Penthouse Premium Unit Price				5.0% over bldg	<u>$453,563</u>	if with penthouse premium [4]
23)						$553	/ nsf
24)	Gain / Loss				lines 22 minus 15	($231,363)	if priced at penthouse premium
25)					lines 24 div by 15	*-33.8%*	develop return over break even

Notes

[1] One-off costs include less efficient ratio of common area (elevator, stairwells, hallways, service closets), less efficient exterior wall to interior space ratio, probable unique utility stacking requirements, and need to buffer and coexist with building mechanical systems and other roof top uses

[2] Higher operating costs per square foot of added penthouse space compared with building average not quantified, but likely to be 10% to 25% higher due to building fixed costs per floor to maintain common elements (elevator, stairwell hallways, service closets) and private spaces subject to more exterior elements plus less interior economies of scale

[3] Affordable unit pricing = 30% gross income requirement to unit price ratio, assuming 50% of Area Median Income (AMI) of $52,500 per year

[4] Penthouse pricing premium over building market limited due to required setbacks restricting views and inclusion of other rooftop uses

Bolan Smart Associates, Inc (10/14)

Table 2
Roof Top Penthouse Residential Economic Feasibility: 8% IZ

#	Residential (sale or rental valuation)			Bldg Market Rate	IZ	Roof Top Penthouse Unit		
2)	Assumptions				8% of market units			
3)					80% AMI / partial unit			
4)	unit size	1,000	gsf	1,000 gsf	80 gsf		1,000	gsf
5)	net square foot	84 0%	ratio	840 nsf	67 nsf	82 0% ratio	820	nsf (less efficiency factor)
6)	land	varies		$100 / gsf	$100 / gsf		$0	/ gsf
7)	construction	$200	/ gsf	$200 / gsf	$200 / gsf	130 0% of bldg	$260	/ gsf (extra one-off costs) [1]
8)	soft costs	25 0%		$75 / gsf	$75 / gsf	125 0% of mrkt	$94	/ gsf (added unique elements)
9)	investor return	18 0%		<u>$68</u> / gsf	<u>$68</u> / gsf	18 0%	<u>$64</u>	/ gsf
10)	Total Cost / SF			$443 / gsf	$443 / gsf		$417	/ gsf
11)				$527 / nsf	$527 / nsf		$509	/ nsf
12)	Total Cost Per Unit			<u>$442,500</u>	<u>$35,400</u> partial unit		<u>$417,425</u>	
13)	AMI Subsidy / Offset			$0	NA	IZ line 20	$13,000	
14)	Operating Cost Differences [2]			<u>$0</u>	<u>$0</u>	some, but not quantified		
15)	Required Unit Price			<u>$442,500</u>	<u>$22,400</u> [3]	lines 10 plus 11	<u>$430,425</u>	break even price
16)				$527 / nsf	$280 / nsf		$525	/ nsf
17)								
18)	Building Market Unit Price			<u>$442,500</u>	<u>$22,400</u>		<u>$431,964</u>	building market price / nsf
19)				$527 / nsf			$527	/ nsf
20)	Gain / Loss			$0	($13 000)	lines 18 minus 15	$12,075	if priced at building market
21)					partial unit	lines 20 div by 15	2 8%	develop return over break even
22)	Penthouse Premium Unit Price					5 0% over bldg	<u>$453,563</u>	if with penthouse premium [4]
23)								
24)	Gain / Loss					lines 22 minus 15	$23,138	if priced at penthouse premium
25)						lines 24 div by 15	5 4%	develop return over break even

Notes

[1] One-off costs include less efficient ratio of common area (elevator, stairwells, hallways, service closets), less efficient exterior wall to interior space ratio, probable unique utility stacking requirements, and need to buffer and coexist with building mechanical systems and other roof top uses

[2] Higher operating costs per square foot of added penthouse space compared with building average not quantified, but likely to be 10% to 25% higher due to building fixed costs per floor to maintain common elements (elevator, stairwell, hallways service closets) and private spaces subject to more exterior elements plus less interior economies of scale

[3] Affordable unit pricing = $280,000 @ 30% gross income requirement to unit price ratio, assuming 80% of Area Median Income (AMI) of $84,000

[4] Penthouse pricing premium over building market limited due to required setbacks restricting views and inclusion of other rooftop uses

Bolan Smart Associates, Inc (10/14)

Table 3
Penthouse Residential Condominum
ANNUAL DIRECT DC TAX REVENUE NET OF MULTIPLIERS - $2014

Project Description				**Project Related DC Residents**
1)	Condominiums	4 units		1 5 persons / unit
2)	Market Component	100%		4 occupied units
3)	Market Units	4 units		6 1 total residents
4)	Average Size	1,000 gsf		100% net residents
5)	Total Saleable SF	4,000 gsf	820 nsf	6 1 DC residents

			Building / Parking	
Real Estate Tax			one gsf	total gsf
6)	Condominium Real Estate Value (including parking)	$553 per net sf	$454	$1,814,250
7)	DC Homestead Exemption	$67,500 per unit for 40% of units	($27)	($108,000)
8)	Seniors Exemption	considered unlikely		$0
9)	Taxable Residential Real Estate Value (assessment)		$427	$1,706,250
10)	Parking (included above)			NA
11)	Total Taxable Real Estate Value	100 0% of assessment	$427	$1,706,250
12)	Residential Real Estate Tax	0 85% residential tax rate	$3 63	$14,503
13)	***Total Real Estate Tax Revenue***		$3 63	***$14,503***
Residential Direct Tax Revenues			one unit	total units
14)	Average Unit Value	$553 per net sf	$453,563	$1,814,250
15)	Required Gross HH Income	25 0% multiple of unit value	$113,391	$453,563
16)	Taxable Income	80 0% of gross	$90,713	$362,850
17)	Initial DC Income Tax	$40,000 of initial taxable income	$2,200	$8,800
18)	Additional DC Income Tax	8 5% DC tax rate over initial	$4,311	$17,242
19)	Total Potential DC Income Taxes		$6,511	$26,042
20)	Income Taxes Adjusted for Average Occupancy	100 0% occupancy	$6,511	$26,042
21)	Potential DC Residents	100 0% of residents pay income taxes	$6,511	$26,042
22)	***Income Tax Revenue Adjusted for Resident Status***	100 0% residents	$6,511	$26,042
23)	New Resident Retail Expenditures Subject to Sales Tax	40 0% of taxable income	$36,285	$145,140
24)	District of Columbia Resident Sales Capture	30 0% of expenditures	$10,886	$43,542
25)	***DC Average Applicable Sales Tax*** [1]	7 5% blend of categories	$816	***$3,266***
26)	***Other Resident Related Use Taxes and Fees*** [2]	0 6% of taxable income	$544	***$2,177***
27)	Personal Property Tax			$0
28)	***Total Residential Direct Tax Revenues***		$7,871	***$31,485***
Recurring Property Resale Transfer Fees				
29)	Annual Re-sales Related Taxes (2 9% combined fees)	7 0% annual unit turnover	$0 92	***$3,683***
30)	Annual Refinance Deed Recordation Taxes			not calculated
Parking (included with unit purchase)				
Total Direct Annual Tax Revenue				
31)			$12 42	***$49,671***

Notes

[1] Based on blend of sales tax on general goods and services and DC retained sales tax on restaurant related sales

[2] Building operations purchases, resident DMV fees, utility and telecommunications fees, other licensing fees and charges

Bolan Smart Associates, Inc (10/14)

Table 4
Roof Top Penthouse Commercial Economic Feasibility

Line	Item	Assumption		Bldg Market Rate		Roof Top Penthouse Use		
1)	Commercial (sale or rental valuation)			**Bldg Market Rate**		**Roof Top Penthouse Use**		
2)	Assumptions					50% of DC assessed land value payment to HPTF		
3)								
4)	floor area	4,000	gsf	4,000 gsf			4,000	gsf
5)	net square foot	92 0%	ratio	3,680 nsf		88 0% ratio	3,520	nsf (less efficiency factor)
6)	land	varies		$150 / gsf			$0	/ gsf
7)	construction	$165	/ gsf	$165 / gsf		120 0% of bldg	$198	/ gsf (extra one-off costs) [1]
8)	soft costs / TIs	35 0%		$110 / gsf		110 0% of mrkt	$121	/ gsf (added unique elements)
9)	investor return	20 0%		<u>$85</u> / gsf		20 0%	<u>$64</u>	/ gsf
10)	Total Cost / SF [2]			$510 / gsf			$383	/ gsf
11)				$555 / nsf			$435	/ nsf
12)	Total Cost Per Sample Floor Area			<u>$2,041,200</u>			<u>$1,532,520</u>	
13)	AMI Subsidy / Offset			NA		$75 / gsf	$300,000	HPTF payment @ 50%
14)	Operating Cost Differences [3]			<u>$0</u>		some, but not quantified		
15)	Required Sample Area Price			<u>$2,041,200</u>		lines 12 plus 13	<u>$1,832,520</u>	break even price
16)				$555 / nsf			$521	/ nsf
17)								
18)	Building Market Price			<u>$2,041,200</u>			<u>$1,952,452</u>	building market price
19)				$555 / nsf			$555	/ nsf
20)	Gain / Loss			$0		lines 18 minus 15	$119,932	if priced at building market
21)						lines 20 div by 15	*6.5%*	develop return over break even
22)	Penthouse Premium Price					0 0% over bldg	<u>$1,952,452</u>	if with penthouse premium [4]
23)							$555	/ nsf
24)	Gain / Loss					lines 22 minus 15	$119,932	if priced at penthouse premium
25)						lines 24 div by 15	*6.5%*	develop return over break even

Notes

[1] One-off costs include less efficient ratio of common area (elevator, stairwells, hallways, service closets), less efficient exterior wall to interior space ratio, probable unique utility stacking requirements, and need to buffer and coexist with building mechanical systems and other roof top uses

[2] Cost equates to approximately $36 per rentable square foot (nsf) at approximately 88% ratio of gsf to nsf at 6 0% net cash flow

[3] Higher operating costs per square foot of added penthouse space compared with building average not quantified, but likely to be 5% to 10% higher due to building fixed costs per floor to maintain common elements (elevator, stairwell hallways, service closets) and private spaces subject to more exterior elements plus less interior economies of scale

[4] No assumed premium penthouse pricing for commercial use

Bolan Smart Associates, Inc (10/14)

Table 5
Penthouse Office Use
ANNUAL DIRECT DC TAX REVENUE NET OF MULTIPLIERS - $2014

Project Description				**Direct Project Full Time Employment** [1]
1) General Office	4,000 gsf			195 gsf per office job
2) Retail (see retail)	0 gsf			19 office jobs
3) Total Building Area	4,000 gsf	3,520 nsf		50 parking space / parking job
4) Parking	3 spaces	1 space / 1,200 gsf		0 parking jobs
5)				20 total jobs

		Building / Parking	
Real Estate Tax		one gsf	total gsf
6) General Office Real Estate Value	$555 per nsf	$510	$2,041,200
7) Retail Real Estate Value (see retail)			
8) Parking (included above)			
9) Total Taxable Real Estate Value (assessment)	100 00% of value	$510	$2,041,200
10) Real Estate Tax Revenue	1 85% commercial tax rate	$9.44	$37,762
11) ***Total Real Estate Tax Revenue***		$9 44	***$37,762***
Private Sector Office Direct Tax (100% private occupancy)		one gsf	total gsf
12) Taxable Gross Revenues (adjusted for 0% vacancy)	$175,000 per employee	$718	$2,871 795
13) DC Corporate Tax	9 975% on 4% profit on gross	$2 86	$11,458
14) Business Personal Property (adjusted for 0% vacancy)	$2,500 per employee	$10.26	$41,026
15) Business Personal Property Tax [2]	$3 40 per $100 > $50K / 10K sf	$0 18	$715
16) Other Operating Taxes and Fees [3]	$0 60 per gsf	$0.60	$2,400
17) Total General Office Related Taxes		$3.64	$14,573
18) ***DC Private Office Tax Capture***	100 0% net DC revenues	$3 64	***$14,573***
Parking (office day, retail & cultural other times)		one space	total spaces
19) Parking Income	$20 00 per space per day		
20)	$7,300 per space per year	$7,300	$24,333
21) ***DC Parking Revenue Tax***	18 0% of gross revenue	$1,314	***$4,380***
Employee Related Sales Tax Revenue		one gsf	total gsf
22) FTE Employee Retail Expenditures Subject to Sales Tax	$60 00 per FTE per week	$15.25	$61,008
23) ***Employee Related Sales Tax***	8 0% mostly meals	$1 22	***$4,881***
Total Direct Annual Tax Revenue			
24)		$15 40	***$61,596***

Notes
[1] FTE is full time equivalent employee, assumed at 40 hours per week
[2] $50k exemption per business
[3] Operations purchases, utility and telecommunications fees, other business license fees and charges

Table 6
Restaurant Penthouse Use
ANNUAL DIRECT DC TAX REVENUE NET OF MULTIPLIERS - $2014

	Project Description				Direct Project Full Time Employment [1]	
1)	General Retail	0 sf			350 sf / job	0 jobs
2)	Restaurant	4,000 sf			240 sf / job	17 jobs
3)	Total Retail	4,000 sf (gla)	3,520 nsf			17 jobs
4)	Parking	5 spaces	space / 800 gsf		35 spaces / job	0 jobs
5)						17 total jobs

		Building / Parking		
	Real Estate Tax		one gsf	total gsf
6)	General Retail Real Estate Value		$0	$0
7)	Restaurant Real Estate Value	$483 per nsf	$425	$1,700,000
8)	Parking (included above)			NA
9)	Total Taxable Real Estate Value (assessment)	100 00% of assessment	$425	$1,700,000
10)	Real Estate Tax Revenue (1 65% rate on first $3 0M of value)	1 85% commercial tax rate	$7 86	$25,450
11)	***Total Real Estate Tax Revenue***		$7 86	***$25,450***
	General Retail Direct Tax Revenues		one gsf	total gsf
12)	Taxable Sales (adjusted for 0% vacancy)	$0 per gsf	$0	$0
13)	DC Average Applicable Sales Tax	6 00%	$0.00	$0
14)	Sales Tax	85 0% net of on-site consumers	$0 00	$0
15)	DC Corporate Tax	9 975% on 4% profit on gross	$0.00	$0
16)	Business Personal Property	$0 00 FF&E per sf	$0.00	$0
17)	Business Personal Property Tax [2]	$3 40 per $100 > $50K / 3 0K sf	$0 00	$0
18)	Other Operating Taxes and Fees [3]	$0 00 per gsf	$0.00	$0
19)	Total General Retail Related Taxes		$0.00	$0
20)	***General Retail Related DC Tax Capture***	100 0% net DC sales	$0 00	***$0***
	Restaurant / Bar Direct Tax Revenues		one gsf	total gsf
21)	Taxable Sales (adjusted for 0% vacancy)	$450 per gsf	$450 00	$1,800,000
22)	DC Average Applicable Sales Tax	10 0% incl 1% conv center rate	$45.00	$180,000
23)	Sales Tax	75 0% net of on-site consumers	$33 75	$135,000
24)	DC Corporate Tax	9 975% on 4% profit on gross	$1 80	$7,182
25)	Business Personal Property	$90 00 FF&E per sf	$82.80	$331,200
26)	Business Personal Property Tax [2]	$3 40 per $100 > $50K / 5 0K sf	$2 48	$9,901
27)	Other Operating Taxes and Fees [3]	$0 60 per gsf	$0.55	$2,208
28)	Total Restaurant Related Taxes		$38.57	$154,291
29)	***Restaurant Related DC Tax Capture***	100 0% net DC sales	$38 57	***$154,291***
	Parking		one space	total spaces
30)	Parking Income	$35 00 per space per day		
31)		$12,775 per space per year	$12,775	$63,875
32)	***DC Parking Revenue Tax***	18 0% of gross revenue	$2,300	***$11,498***
	Employee Related Sales Tax Revenue		one gsf	total gsf
33)	FTE Employee Retail Expenditures Subject to Sales Tax	$45 00 per FTE per week	$9.83	$39,334
34)	***Employee Related Sales Tax***	8 0% (mostly meals)	$0 79	***$3,147***
	Total Direct Annual Tax Revenue			
35)			$48 60	***$194,385***

Notes
[1] FTE is full time equivalent employee, assumed at 40 hours per week
[2] $50k exemption per business
[3] Operations purchases, utility and telecommunications fees, other business license fees and charges