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VOICE Statement in Support of Alexandria's 2040 Master Housing Plan

May 30, 2026

VOICE commends the proposed 2040 Master Housing Plan for its bold vision and comprehensive set of strategies. In our almost 20-year history of community organizing, VOICE consistently finds housing to be this region's top need and our members' priority. We agree Alexandria should aspire that residents and workers of all incomes, ages, abilities, and backgrounds have a place in Alexandria— in healthy, safe, and resilient housing that they can afford.

VOICE provided a detailed statement during the planning process and we are pleased to see our priorities reflected in these goals:

Goal 1—*Expand housing supply.* VOICE affirms the need to legalize and build more diverse housing types city-wide.

Goal 3-- *Strengthen tenant protections and enhance resources to support tenants and landlords.* VOICE aligns with tenant organizations in pressing Alexandria to do more to provide tenants with housing stability through increased rights and financial assistance.

Goal 4--*Create rental housing that prioritizes affordability up to 60% of the area median income to expand opportunities for renters and workers with the fewest housing options.* VOICE advocates for additional local investment to subsidize affordable housing.

As bold as this 2040 housing plan is, its scope underscores the urgent need to increase the city's financial investment in housing. The current budget commitments do not provide the infusion of funds to build out the city's approved pipeline of affordable housing projects, much less move forward with the many good ideas in this plan. VOICE continues to call on the city to prioritize using its debt capacity and bonding authority to unlock at least $50M for the affordable housing pipeline in the next 12-24 months. The plan document suggests the city's next step will be to set housing targets at various income levels. That decision cannot occur without seriously discussing how Alexandria will back up this vision with dollars.

With the 2026 passage of state housing legislation, we have an incredible opportunity to encourage faith institutions to use their property for affordable housing and to expedite approval processes for all affordable housing projects. Decreasing the city's onerous 3-year approval process for most multifamily housing, and building off of the Zoning for Housing policies are key strategies for meaningfully decreasing the cost of housing driven by delay, ambiguity and overly long process. This will make public dollars invested in affordable housing more efficient, but we still need an influx of those dollars if we want to preserve and build affordable homes specifically. The 2040 Master Housing Plan outlines many additional strategies with great promise for addressing our state's housing needs. Alexandria can be the leader for our region in providing homes for all by approving the 2040 Master Housing Plan and immediately beginning a vigorous community dialogue about how we can increase our financial investment to match our vision.

Submitted by the VOICE Alexandria Housing Team, Marsha Rhea and Victoria Linner, co-chairs

VOICE is a nonpartisan coalition of over 48 faith and community organizations in Northern Virginia working together to build power in middle and low-income communities. Since our founding in 2008, we have organized in Prince William, Fairfax, and Arlington counties as well as the City of Alexandria uniting people across lines of race, class, religion, political party and geography to take action on key issues in our community.

June 8, 2026

The Honorable Alyia Gaskins, Mayor
Alexandria City Council
4850 Mark Center Drive
Alexandria, VA 22311

Dear Mayor Gaskins:

Housing issues, including supply, affordability, and quality, have emerged as a critical area of policy concern for the City of Alexandria, the Commonwealth of Virginia, and our entire region. Alexandria's Housing 2040 Plan seeks to bring together all participants in the housing market to achieve the best possible outcomes in Alexandria across the next decade and a half. The Apartment and Office Building Association of Metropolitan Washington (AOBA) is pleased to have contributed to the development of the Plan through our, and our members', participation in numerous city fora and private meetings across the past several years. We appreciate where the City has made use of our advice and our members' experience. But there remain many plan elements that would benefit from rewriting or reinterpretation to foster a mutually constructive relationship amongst all housing market participants.

As you know, AOBA is the premier non-profit organization representing owners and managers of nearly 490,000 apartment units and more than 150 million square feet of office space in the District, Maryland, and Virginia. Of that portfolio, nearly 2.8 million square feet of office space and more than 32,000 multifamily residential units are located in the City of Alexandria. Our members play a critical role in building and operating the commercial and residential buildings that will accommodate the economy and workforce of the future. As such, our member companies consider themselves part of the Alexandria community and maintain a vested stake in the city's long-term sustainability and well-being.

AOBA and our members are committed to being productive partners in achieving the Housing 2040 Plan's goals, and we agree with many of the recommendations and strategies that support them. For example, we support increasing Alexandria's housing supply. In other cases, we support the intent of recommendations and strategies but have concerns about how the draft plan proposes to operationalize them. For example, the City is more likely to find success in meeting its proposed housing development and preservation goals if it targets its programs to bridge the gaps in the private marketplace; frustration will likely result if instead it pushes for unachievable outcomes. The housing industry looks forward to working constructively with the City for the best possible results.

We are disappointed, however, by other aspects of the draft plan that read as though the City sees itself as being in an adversarial relationship with its housing providers or sees its role as choosing sides in an adversarial relationship between housing providers and residents. Housing, and especially rental housing, works best when residents, government, and housing providers engage collaboratively, with open and constructive dialogue, to resolve issues and to support each other in meeting our obligations. The relationship between housing providers and residents requires balance, and housing providers look to the City to help sustain that balance. We hope that the City will amend the aspects of the draft plan that posit opposition between the City and its housing providers, or failing that, enact the plan in a manner that treats housing providers as partners for its success.

We offer comments and recommendations, below, for each of the Housing 2040 Plan's ten goals. Writing at this level allows us to maintain a thematic approach whilst providing specifics on key topical areas. In many cases, we will refer to specific recommendations and strategies, though not by number; in other cases, we will take on a goal as a comprehensive unit. We would be happy to provide additional thoughts or recommendations, if you desire, and if such exposition can be of service.

Goal 1: Housing Diversity and Supply

AOBA and our members support the City's pursuit of new opportunities to expand the housing supply. Increasing supply is the only method proven to lower housing costs permanently whilst constructively building Alexandria's community and fiscal base. The recommendations and strategies for this goal are salient, seek to inculcate an all-of-government approach to housing development, and recognize that having housing of all typologies and price points in Alexandria will create a housing market that works well for residents and prospective residents who fit any housing style or affordability level. Collaboration between the City and the development community ensures that we can right-size requirements and streamline City support for private sector operations. The City, however, must take care that its policies toward the providers of this housing once developed do not deter housing developers from engaging in this partnership.

Goal 2: Affordable Housing Preservation

The draft plan speaks of working with owners and providers of affordable housing to preserve affordability; however, the recommendations and strategies lead with asserting the City's right of first refusal to disrupt and delay a private transaction to take possession of a property, which will foster an adversarial relationship.

Financial assistance can help housing providers maintain affordability without impacting their balance sheets, and a preservation fund can bring together public and private resources to a common goal. By contrast, right of first refusal risks reducing the value of these properties since private buyers will decrease offer prices to account for the risk of losing their bid to a government match. Lower expected future bid prices will reduce the present value of new affordable housing projects, which could jeopardize their ability to secure financing and could put the addition of new affordable housing stock at risk.

Even if the City is exchanging public investment for a right of first refusal, we caution that the City should not demand more value in the right of first refusal than it provides in investment. Neither would it be appropriate for City departments to coerce property owners into granting a right of first refusal as a condition of any collaboration with the City, financial or otherwise, or under threat of a poor relationship with the City if the owners do not grant the right voluntarily.

Several recommendations for this goal can be constructive bases for partnership between the City and housing providers, so long as the City positions its programs for mutual benefits. Financial and technical assistance can help housing providers with rehabilitation projects, but the City should support housing providers' real needs, and not chase goals expressed by other interest groups or establish guidelines that are out of step with the resources that it is able to provide. Bonus density and partnership financing can help affordable housing preservation projects work financially, provided that the City works with housing providers, developers, and financiers to ensure that their incentives work in practice.

Goal 3: Tenant Protections and Landlord-Tenant Relations

Residents and housing providers each have rights and each have responsibilities. This duality and the importance of both parties' fulfilling their responsibilities under the terms of their lease and the Virginia Residential Landlord and Tenant Act (VRLTA) underpins the mutually beneficial relationship that sustains a strong rental housing market. Neutrally designed educational materials focusing on all parties' rights and responsibilities under the VRLTA will help everyone to do their part for quality housing and productive relationships. The materials envisioned in the draft plan's recommendations, however, focus exclusively on residents' rights and providers' responsibilities. Designing materials more neutrally will support more positive engagement between the City and housing providers and between residents and housing providers. Similarly, targeted outreaches to housing providers can be helpful in certain cases, but the City should validate the veracity of residents' complaints or the reason for eviction filings before making any such outreach.

The proposed legislation in the draft plan will make it harder for housing providers to maintain stable housing and will lead to increased costs for residents. Housing providers must pay their maintenance, staffing, and financing costs on time; allowing residents flexibility to pay rent after the due date creates cash flow challenges for providers who must meet these maintenance, staffing, and financing obligations on fixed schedules. The resulting uncertainty is likely to be priced into rents across the board.

"Just cause" renewal laws may seem reasonable on the surface, but they create a permanent right to remain in a property that the resident does not own – prospective housing providers will be less likely to rent available space if they will not be able to recover it at the end of the current or a future lease term. The ability to non-renew a tenant who engages in disruptive behavior is one of the few tools available to a housing provider to protect other residents of the community. "Just cause" non-renewal establishes an extremely high standard for removing nuisance tenants, requiring a full legal proceeding, and will ultimately result in the degradation of our apartment communities. Housing providers generally will non-renew a resident only as a last resort because turnover represents a significant cost that the housing provider cannot recover in an ensuing lease term.

Service fees allow specific charges to be borne exclusively by the residents consuming the service; limiting fees means that all residents will have to pay the additional costs in their rent, even if they don't have a pet, park a car, use the gym, etc. Screening limitations can lead to more rigorous standards to ensure that prospective residents can and will pay rent. By contrast, the City would foster a better and more sustainable housing market by advocating in Richmond along with both residents and housing providers for balanced policies that support all housing market participants.

The draft recommendation for housing affordability includes a strategy encouraging "voluntary" compliance with a City-created annual rent increase policy, including a requirement of compliance for participating in opportunities for public assistance. This strategy is an attempt to circumvent the Commonwealth's prohibition on localities enacting rent control or stabilization ordinances. Rent control or stabilization policies destroy housing markets because they preclude housing providers from ensuring that they will have the resources to maintain and service their properties. Since Montgomery County, Maryland, implemented countywide rent control in 2023, new permits for multifamily housing have decreased by 96%. The City of Tacoma Park, Maryland, adopted rent control in 1981; they have not seen a single new rental housing unit built since. Even a voluntary rent increase policy that conditions access to public assistance on compliance functions as *de facto* rent stabilization and will have similar market effects, including signaling to prospective developers that Alexandria's regulatory environment is less constructive than neighboring jurisdictions'. The City of Alexandria is less than 16 square miles in area; adopting as policy that the City will cajole its housing providers into *de facto* rent control will not curtail rents. Rather, it will induce housing developers to look instead to neighboring jurisdictions, such as Fairfax County.

Housing providers do not want to file for eviction, but residents have a responsibility to adhere to the VRLTA and the terms of the lease that they signed. The draft plan document attributes 95% of eviction cases to nonpayment. It is worth noting that an eviction filing is not the same as an eviction: many cases are resolved before judgment when residents pay arrears or access rental assistance. Still, residents have a responsibility under the VRLTA to make timely rent payments, and housing providers depend on these timely payments to meet their obligations. The remaining 5% of eviction cases come from other critical breaches, including property damage, unauthorized occupants, and in some cases threats to the safety of other residents or staff. Housing providers should not face public censure such as being named on a City website for asserting their legal rights under the Code of Virginia in court, particularly when the underlying circumstances involve genuine safety concerns or sustained nonpayment.

The City can support the housing market, and its residents, when it accounts for the realities that both housing providers and residents face in challenging situations. For example, expanding rental assistance and allowing housing providers to take the initiative to tap that assistance will help keep residents in housing and ensure that providers are able to meet their obligations. Similarly, residents facing an eviction suit often benefit from counsel both to represent them and to advise them of their responsibilities, but we caution that an absolute right to counsel can leave residents with larger judgements against them if cases are delayed because of the absence of counsel, allowing rent arrears to continue to grow.

We support and are eager to work with the City to deepen its engagement with housing providers, which we see as an approach to positive relationship-building. For engagement to work, the City must listen to housing providers' needs and treat them as partners in maintaining a stable housing market. The First Amendment protects residents' right to associate peaceably and to petition for the redress of their grievances. The City is within its rights to support residents in maximizing the effectiveness of their association and petition. However, the City's housing providers are also key constituents, and the City will advance its housing goals most effectively as a neutral party seeking to bring the concerns of both residents and housing providers together and to help them to hear and to communicate with each other for better understanding.

Goal 4: Affordable Rental Housing

Clear goals and developing innovative strategies can help bring more financing into Alexandria to help expand our housing supply. It is vital that the City ground its affordable housing creation goals and expectations in real market conditions. All development and operating costs require expected offsetting revenues, and private sector participants in development financing will require market returns to their investment, or else they will decline to invest in Alexandria's affordable housing stock. The City should take care to ensure that the goals it sets reflect achievable, if ambitious, outcomes given market conditions.

Similar caution is prudent when updating zoning ordinances or seeking legislative authority for affordable housing or financial contributions as a condition of housing development. It is important to ensure that bonus height or density fully compensate for financial contributions or the difference between market and committed affordable rent revenues. Working collaboratively with housing developers in crafting zoning amendments or legislative advocacy will allow the City to benefit from their pragmatic feedback and demonstrates that the City views housing developers and providers as genuine partners.

Goal 5: Affordable Home Ownership and Homeowner Resources

A strong and accessible ownership market supports the rental market as prospective renters often seek communities where they might later become homeowners. Similarly, a healthy housing stock offers residents a variety of housing options to fit their unique needs. However, since AOBA's work does not include owner-occupied housing, we will refrain from providing feedback on the specific recommendations and strategies enumerated in support of this goal.

Goal 6: Condominium Communities

AOBA does, from time to time, work with condominium communities on subjects of common interest with apartment communities. However, as policies specific to condominiums are beyond the scope of AOBA's policy advocacy, we will refrain from providing feedback on the specific recommendations and strategies enumerated in support of this goal.

Goal 7: Housing Resources for Seniors and Persons with Disabilities

AOBA's members support and comply with the requirements for reasonable accommodation for seniors and people with disabilities in the Virginia and federal Fair Housing Acts. We also agree that supporting residents and property owners in developing alternative housing typologies will add diversity into Alexandria's housing market, which benefits all residents, even if they will not live in the new housing. We caution that the City should take care not to obviate the good it intends in developing this housing by adopting other policies that may deter property owners from renting the potential new units.

Goal 8: Housing Quality, Safety, and Livability

Rental housing providers are committed to maintaining and providing high quality housing. Residents also have a role in maintenance as providers cannot respond to maintenance issues in a unit unless the resident has notified them and given them a chance to do the work. Collectively, we also must appreciate that it can take time to order necessary parts and to perform repair work, notwithstanding everyone's desire to resolve maintenance issues in a timely manner.

Providing technical assistance and building relationships will help housing providers maintain their properties. Positive recognition can be a benefit if the City undertakes it as a genuinely positive outreach to housing providers. We are concerned about the public display of resident complaint data before it has been verified or adjudicated. The draft plan calls for using data to recognize responsible housing providers, which AOBA supports, but publishing raw complaint figures without context risks creating misleading impressions about properties where complaints reflect resident disputes rather than provider failures. Along the same lines, while inspections can help to catch code violations, we have also seen instances where backlogs in municipal inspection programs result in prospective residents being kept out of perfectly good housing because it is awaiting inspection.

Goal 9: Housing Stability and Economic Mobility

AOBA and our members seek to provide apartment housing, and office space, which helps Alexandrians – and residents throughout our region – build strong, prosperous, and productive lives. Sharing best practices is good and showcasing the innovative work that Alexandria's housing providers are doing helps build a positive relationship between the City and its housing providers. The City should take care not to mandate "best" practices above and beyond the Virginia Uniform Statewide Building Code, which can result in raising housing costs for little substantive gain in the design. Similarly, AOBA appreciates the City's supporting renters in building savings and credit building, though we would be wary of any operationalization of this recommendation that imposes burdens not found in the VRLTA on housing providers.

Goal 10: Sustainability and Resilience in Housing

AOBA supports sustainable building design and operation, and our members dedicate resources to sharing best practices and to promoting a sustainable built environment in the District, Maryland, and Virginia. Notably, nearly all of AOBA's members benchmark their properties for the purpose of gaining operational insights and improving efficiency. Property owners have a strong business incentive to minimize their costs from wasted energy, and so they do not require government mandates to track building performance. Mandatory energy benchmarking and disclosure, however, raise practical concerns, including how requirements account for structural and use differences between buildings of varying age and type, and how benchmarking data are contextualized to avoid misleading comparisons. AOBA supports voluntary benchmarking and would welcome a conversation about pairing any disclosure requirements with meaningful financial incentives that offset compliance costs.

AOBA has engaged constructively with Alexandria's Green Building Program, and a well-designed incentive program can support a more sustainable built environment. Green building incentives should more than offset the costs of investment in green building to establish these practices as both environmentally and financially sustainable. Stretch design goals can foster innovation, but the City should not hold developers and building managers to a *de facto* building code that exceeds Virginia's Uniform Statewide Building Code standards.

Conclusions

AOBA and our members have a strong desire to maintain a collaborative relationship with the Alexandria City government, and keeping open and constructive relationships with residents is foundational to housing providers' success. We look forward to working with the City and our residents to support and grow Alexandria's housing market because we will only be successful in achieving the Housing 2040 Plan goals if we work together.

As the Council prepares to adopt the Housing 2040 Plan, we ask that you direct City staff to engage with AOBA and our members early and regularly as they develop and carry out implementation strategies, particularly for Goals 2, 3, 4, and 8, where housing providers' involvement will be essential to achieving the outcomes the Plan envisions.

We thank you for your consideration of our comments.

Sincerely,

Scott E. Pedowitz
Vice President of Government Affairs, Virginia-Local
Apartment and Office Building Association of Metropolitan Washington (AOBA)

cc: Alexandria City Council; James F. Parajon, City Manager, Aspasia Xypolia, Tamara Jovovic, Mary Horner, Chris Do, and Helen McIlvaine, Office of Housing; Paul Stoddard, Carrie Beach, Department of Planning and Zoning; Christina Zechman Brown, Deputy City Attorney

Testimony of the Alexandria Commission on Aging on Housing 2040

Alexandria City Council

June 13, 2026

Good morning Mayor Gaskins and members of the City Council. My name is Michael Schuster. I am the co-chair of the Alexandria Commission on Aging.

We support the Housing 2040 Plan, particularly goals three and seven promoting tenant protections and affordable housing options for older adults, respectively. Let me start by putting the issue of affordable housing for older Alexandrians in context. The percentage of Alexandria residents over the age of 65 grew by 60 percent between 2010 and 2023 – from 12,300 to 19,800. These numbers will expand significantly. According to the Virginia Joint Legislative Audit and Review Commission or JLARC, more than 600,000 Virginians are projected to be 80 years of age or older by 2040 – the end date of this Plan. Approximately one million Virginians have one or more disabling impairments. This year, more than 25 percent of Virginians are over the age of 60 and the number of Virginians aged 85 or older, will increase five times faster than the state's total population growth.

As the Plan notes, dealing with this increasing older population with various physical needs and price points, the solutions for addressing older Alexandrian's' desire for appropriate affordable homes will take creative policies and a long time.

Although the Commission on Aging has long supported a mixed income affordable assisted living facility (MIAALF) in Alexandria like Chesterbrook Residences in McLean, we know that the financial resources to purchase a suitable location in Alexandria and having sustaining funds to operate such a facility will take creative financing and time. The Commission will continue to advocate for a MIAAFL, but we focus on more achievable improvements in 2027.

Thus, the Commission has supported an incremental approach. Here are some proposals we hope both the Housing 2040 Plan and City will endorse and pursue in the coming years:

1. An increase in the Auxiliary Grant benefit ($2,418 in Northern Virginia) and corresponding personal needs allowance ($83) for low income individuals – this is the only public program paying for affordable assisted living https://dars.virginia.gov/benefits/auxiliary-grant/;
2. A comprehensive study on adult housing options and services allowing older individuals to age in their communities. JLARC is already conducting a study on In-home and residential congregate care services for aging Virginians, including developing options for expanding the availability of services for older Virginians and the potential of expanding them through a Medicaid waiver – scheduled for release in 2026 or 2027

3. Legislation expanding Medicaid waivers for both in-home services and assisted living.
4. The promotion of Universal Design (https://universaldesign.org/definitionpolicies) policies and incentives to support all of us as we age, such as expanding the Virginia Livable Home Tax Credit. https://www.dhcd.virginia.gov/lhtc. This has been a priority for the Alexandria Age Friendly Plan since 2019.

This concludes my testimony. Thank you for the opportunity to present our views on Housing 2040.

Outlook

[EXTERNAL]Support for Items 18 and 21: Housing 2040 and PRGS Redevelopment

From Bonnie Naugle <bonnie.naugle@gmail.com>
Date Thu 6/11/2026 4:20 PM
To CouncilComment@alexandriava.gov <CouncilComment@alexandriava.gov>

Mayor Gaskins, Vice Mayor Bagley, and Members of Council,

I'm writing to ask for your support on both Items 18 and 21, the Housing 2040 Master Plan and PRGS Redevelopment funding. Housing 2040 lays out a positive vision to address our housing crisis for the foreseeable future, importantly addressing all 3 pillars of a holistic housing solution: producing more homes, preserving existing affordability, and protecting tenants. I'm so excited about our city's vision on this!

Staff have also indicated a Part 2 will follow with more detail on implementation, which is key to ensure this plan is translated from words on the page into reality.
The PRGS site is the last remaining segment of our waterfront the public cannot access. Approving the TIF plan will help produce a 1,000 much-needed homes, including 160 affordable homes, while also stimulating millions of dollars in annual tax revenue that can be used for city services. The open space and waterfront access provided will enhance the neighborhood, and the project will help spark additional development in the area.

Please vote YES on both items!

Thank you,
Bonnie Naugle
Alexandria resident

Outlook

[EXTERNAL]Comments for Saturday's hearing

From Phoebe Coy <phoebeacoy@gmail.com>
Date Thu 6/11/2026 4:33 PM
To CouncilComment@alexandriava.gov <CouncilComment@alexandriava.gov>

Good afternoon,
I would like to submit the following personal comments on docket item 18 for Saturday's hearing.

Mayor Gaskins, Vice Mayor Bagley, and members of Council,

I would like to enthusiastically echo YIMBYs of NoVA's comments (which I co-wrote) in support of the Housing 2040 plan, and I also would like to share a few personal comments focused on a few very specific details of the plan that I believe could be improved.

Wording issues: There are a couple portions of the plan where I believe wording could be improved to more accurately depict the issues surrounding our housing supply crisis.
- Page 1 refers to "past discriminatory zoning [and] land use" practices. This is not accurate - many zoning and land use regulations that were developed with the intent to segregate Alexandria are still the law of the land today, and continue to economically segregate our city. One example is minimum lot sizes. A more accurate wording might be something like "those impacted by past discriminatory lending practices, as well as past and current zoning and land use policies historically rooted in the intent to segregate Alexandria." On a similar note, the box on page 43 could be updated to explicitly mention zoning as part of the discriminatory practices that have resulted in lower homeownership rates for households of color in Alexandria.
- Page 43 has a box highlighting the high cost of homes in Alexandria, which is labeled as the "strength of the homeownership market". I found this to be a really odd choice of words given all the issues the plan highlights with the high cost of housing. I would suggest rephrasing this to something like "2025 average assessments reflect the high cost of becoming a homeowner in Alexandria".

ADU accessibility: Page 51 rightly recommends providing technical assistance to homeowners who wish to build ADUs to provide housing options for senior and disabled family members. In addition to this, I would suggest adding a recommendation to review the ADU policy to ensure that the size limits are appropriate to build accessible one-story ADUs. Not long ago, there was a case where a homeowner had to go before the Board of Zoning Appeals to ask for an increase in the ground floor square footage for an ADU on their property, because they wanted to build an ADU for their mother to move into, and the ground-floor ADU size limit for their property (based on the size of the main home) was too small to build a one-story, one-bedroom wheelchair-accessible home.

Appropriate use of funding to help Alexandrians most in need: Page 57 suggests exploring the use of funding to expand homeownership assistance to homebuyers with incomes between 101% and 120% AMI. For a bit of personal context here, I make just under 100% AMI and have owned my condo for three years. There is no doubt that our housing shortage has made it far more difficult to buy a home in Alexandria than it should be. As our YIMBY comment notes, Alexandrians like me with average and above-average incomes truly just need an increase in housing supply, so that our housing market will work the way it should, and we will have enough opportunities for middle-income households who are ready to become homeowners. Rather than subsidizing a home purchase for someone like me, I believe those taxpayer funds would be put to far better use helping one of the 8,700 households on the waitlist for ARHA. Additionally, for many homeowners like me, I believe the most pressing issue is actually not affording the list price of a home, but rather the impact of inflation on maintenance costs for older condos. I appreciate that this issue is included in the plan - my complex is one of the "poster child" photos in the plan for older condos facing this issue.

Who funds affordable housing?: Page 39 recommends pursuing legislative authority for mandatory monetary or in-kind contributions towards committed affordable housing by housing developers. While I don't know the details and I don't know how much this would differ in practice from the "voluntary" contribution system we have today, I have some concerns about this approach generally. The cost of committed affordable housing in Alexandria should be borne by property owners who are contributing to our housing affordability crisis by choosing not to build homes on vacant or underutilized property, not just by property owners who are actively fixing the problem by building homes. We should make it easy, fast and inexpensive to build homes - and unappealing to not build homes - in order to truly build our way out of our housing shortage. We can move in this direction by following in the footsteps of our neighbors in Falls Church to seek legislative authority for a land value tax.

Tenant protections: I'm a fan of most of the tenant protections proposed on page 33, but there were a few that raised concerns for me, because they appear that they will make it more difficult to be a small landlord, which isn't good for rental housing affordability and availability.
- Requiring landlords to give a specific reason for lease nonrenewal: I believe that small landlords should be allowed to rent out their home for a few years, and have the option to move back in or do something else with the property if they would like to for reasons unrelated to the tenant.
- Capping pet fees: I'm a fan of capping or eliminating fees that are required for everyone, like application and "amenity" fees, but having a pet is not a right, and I suspect some landlords would actually respond to this by no longer allowing pets.
- Limiting eviction records and criminal history in housing decisions: The best answer here is to fix the housing shortage so we have enough homes for everyone regardless of eviction and criminal history. But when multiple people are applying for a home, I think that applicants who have chosen to abide by their prior leases and have chosen not to commit crimes deserve to have that taken into consideration, and landlords should be able to consider information about who might be a better tenant.

In conclusion, to reiterate YIMBYs of NoVA's comments, please vote to adopt the Housing 2040 Plan, and please consider the urgency of our housing crisis laid out in the plan in all decisions you make.

Thank you for everything you do for Alexandria,
Phoebe Coy

YIMBYS OF NOVA

13 June 2026

Mayor Gaskins, Vice Mayor Bagley, and Members of Council,

As the Alexandria leadership team for YIMBYs of Northern Virginia, we are excited to support both the Housing 2040 Master Plan (Item 18) and the redevelopment of the Potomac River Generating Station (Items 20 & 21). **We urge you to vote yes on these items.**

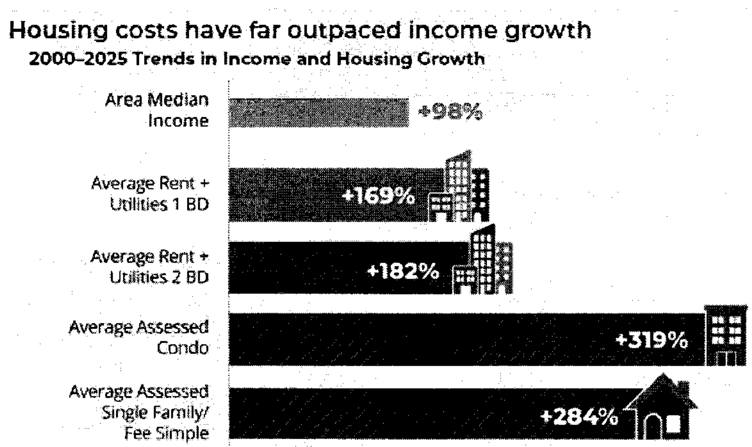
Item 18: Housing 2040 Master Plan

After 1.5 years of extensive community engagement, staff have delivered an impressive and holistic approach to housing policy in the Housing 2040 Master Plan.

While our organizational focus is on the elements of the plan impacting overall supply, we appreciate and commend staff for the Plan's breadth touching on all three pillars of housing policy: production of new homes, preservation of existing affordability, and protections for tenants

The data presented in the plan is clear – Alexandria has a housing affordability emergency. The cost of renting a home in Alexandria has far outpaced the growth in median income since 2000, and the cost of becoming a homeowner has become even more extreme – increasing at approximately triple the rate of increase of median income. According to the plan, there are approximately **8,700** households on the waitlist for public housing, and approximately **10,600** on the waitlist for housing vouchers.

The cause of this is clear: a systematic failure to build enough homes to keep pace with the population and job growth in our region. Our housing shortage has caused numerous life-altering impacts for Alexandrians – from people displaced from their homes when they are unable to afford a rent increase, to seniors who are stuck because they are unable to afford a move to a home that better supports them as they age, to people who live with health impacts such as mold and pests because they are unable to afford a home that supports their health and safety.



We appreciate the plan's multi-layered approach to addressing our housing shortage: maximizing housing supply through our Small Area Plan process; streamlining development review; building homes on city-owned land; continued implementation of Zoning for Housing phase 1 and the launch of phase 2, and ensuring homes can be built quickly & affordably by reviewing zoning and parking rules and implementing new technologies.

We hope you will not only vote yes on Housing 2040, but carry forward the vision of this plan to ensure staff's recommendations are implemented in reality, not just words on a page.

Implementation should include and go beyond the specific measures noted in the plan, treating them as a starting point for action. We hope to see specific plans for implementation of each section, and for the city's legislative agenda to incorporate all of the plan's goals – including the production of new supply.

We would also uplift the asks of our partners at Tenants & Workers United and Legal Aid Justice Center to ensure a particular focus on dedicated affordable housing at the lowest levels of affordability: 40% AMI. Limited public resources should be concentrated toward aid for the lowest income Alexandrians who face the highest risk of displacement, while overall supply increases can provide the relief needed by those closer to the Area Median Income.

Items 20 & 21: Potomac River Generating Station

The PGRS redevelopment will make significant progress to address our housing shortage and will also have enormous benefits for the entire community. Our primary interest is of course in the project's impact on housing supply: over 1,000 much-needed homes including about 160 dedicated affordable units. But the benefits go far beyond this, including the remediation of environmental hazards, opening of the final segment of Alexandria's waterfront for public use, nearly 5 acres of open space for the public, over 400 trees, and improvements to the Mount Vernon Trail.

The project will also bring in millions of annual net tax dollars, which can be put toward a variety of city priorities including funds for ACPS, transportation improvements, subsidized housing, and more. Beyond the funding coming directly from these parcels, the development will also spur further development and growth nearby – initiating a virtuous cycle of growth and development in Old Town North and the surrounding areas.

We encourage you to vote YES on Items 20 and 21.

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We hope Alexandria will continue to welcome new homes of all types, all price points, and in all parts of our city to address our regional housing crisis and make our city better for everyone.

Phoebe Coy, Alex Goyette, Peter Sutherland, Stephanie Elms and Yasir Nagi
YIMBYs of Northern Virginia Alexandria Leads

Elliott M. Waters

325 Cameron Station Blvd
Alexandria, VA 22304

June 2, 2026

Email c/o gloria.sitton@alexandriava.gov
City of Alexandria
Attn: City Council
c/o: City Clerk (Ms. *Gloria Sitton*)
City Hall, 301 King Street
Alexandria, VA 22314

Re: Alexandria Planning Commission Public Hearing – June 2, 2026 (Rev)

Dear Mayor Gaskins and Members of City Council:

As I prepare to appear before the City's Planning Commission today, I have decided to provide each of you my perspectives on the Draft 2040 Housing Plan with some suggested enhancements.

The core intent of the 2040 Housing Plan is sound and the content goals is laudable. Having said that, I find that it is lacking in metrics and targets. To truly help our community, the final plan must include clear, measurable targets using a **SMARTIE** framework recommended for equity-forward planning and goal setting.

I urge the City Council to add the following specific enhancements to the 2040 Plan:

- **Fix purposeful harmful Mistakes.** Include a "Right to Return" provision by a date certain (December 2027) addressing the effects of sanctioned housing policies and practices that favored one group over another resulting in people of color or their descendants being harmed during the 1930s and 1960s.
- **Fix production targets** to build affordable housing for low-income wage earners among us with City subsidies. These are our cashiers, daycare teachers, and seniors.
- **Fix protections for all especially our working families and individuals** among us like our bus drivers, bank tellers, and medical assistants and teachers so they too can afford housing in the range of 50-60% AMI.
- **Fix the preservation of human dignity** by prohibiting inhumane evictions. **Fully fund a program by a date certain (July 2027) that guarantees free legal help to low-income renters facing eviction.**

Alexandria needs a housing plan with clear guidelines, definitions and real accountability. Please update the Housing 2040 Plan to include SMARTIE goals, objectives and tasks before you vote to adopt it.

Respectfully submitted,

Elliott M. Waters

Elliott M. Waters
Former Member, LTRB (2015-2025)

cc: **City Manager, Attn: jim.parajon@alexandriava.gov**
City Attorney, Attn: cheran.ivery@alexandriava.gov
City Planning Commission,

Good evening, Chair and members of the Planning Commission. My name is Elliott Waters and I live on the West End.

As a stakeholder, I am here tonight to offer enhancements to the 2040 Housing Plan. The Plan has a strong vision, but it lacks clarity and specificity in giving hope in the midst of a looming affordability crisis. To deliver on its intent to provide housing for all with equity and inclusion more fully, this plan should adopt a SMARTIE framework popularized by the Management Center in DC.

Specifically, I urge you to write four collaborative fixes into this plan:

- **Fix purposeful harmful Mistakes**. Include a "Right to Return" provision by a date certain (December 2027) addressing the effects of sanctioned housing policies and practices that favored one group over another resulting in people of color or their descendants being harmed during the 1930s and 1960s.
- **Fix production targets** to build affordable housing for low-income wage earners among us with City subsidies. These are our cashiers, daycare teachers, and seniors.
- **Fix protections for all especially our working families and individuals** among us like our bus drivers, bank tellers, and medical assistants and teachers so they too can afford housing in the range of 50-60% AMI.
- **Fix the preservation of human dignity** by prohibiting inhumane evictions. **Fully fund a program by a date certain (July 2027) that guarantees free legal help to low-income renters facing eviction.**

Now, we often hear that Virginia's Dillon Rule stops us from taking action deemed just. I believe We The People At Home In Alexandria should not use state restrictions as an excuse for inaction. While the Dillon Rule stops us from making private developers build affordable units, it does *not* stop us from using the powers we already have given our authority over our local zoning codes, our City budget, and our public land.

We can legally overcome the debilitating effects of the Dillon Rule and use it to motivate us to (1) to maximize voluntary "density bonuses" for developers, (2) dedicate our local housing trust funds to deep affordability tiers, and (3) put strategic income rules on any surplus city land we sell.

In closing, WE THE PEOPLE in Alexandria deserve a housing plan that addresses our general welfare needs such as affordability, accessibility and livability more fully with pragmatic [legal] creativity. **Before you adopt this promising 2040 Housing Plan** conceived in best efforts please add appropriate constructive enhancements so WE THE PEOPLE can all feel the joy of being at home in Alexandria. THANK YOU.

EXECUTIVE SUMMARY – TAB B

To: The Alexandria Planning Commission, Office of Housing, and City Council Members
Regarding: Structural Amendments to the Draft Housing 2040 Plan
Date: June 2, 2026

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1. EXECUTIVE SUMMARY: THE NEED FOR ACCOUNTABILITY

The Draft Housing 2040 Plan establishes an essential long-term vision for equity and affordability in Alexandria. However, by intentionally omitting numeric production targets, income-specific tracking tiers, and binding implementation deadlines, the current draft functions as a statement of good intentions rather than an enforceable strategy. To prevent the economic displacement of low-income residents and deliver real equity, the city must transition the 2040 Plan into a strict **SMARTIE** framework (Strategic, Measurable, Ambitious, Realistic, Time-bound, Inclusive, Equitable).

2. THE EQUITY-DRIVEN SMARTIE MATRIX

The table below illustrates how the high-level priorities of the Draft 2040 Plan must be amended to include clear targets, distinct income metrics, and legal remedies for historically harmed communities.

Goal (2040 Vision)	SMARTIE Target & Timeline	Actionable Tasks & Implementation	Target Beneficiaries
1. Restorative Justice Remediate state-sanctioned housing harms from 1930–1960.	**Right to Return Law** Codify a binding municipal preference policy by December 2027.	• Build a historical verification registry by June 2028. • Dedicate 30% of units on public land to verified descendants.	• Displaced Black families • Historically harmed communities
2. Deep Affordability Expand the housing supply for the lowest income earners.	**Deep Supply Production** Construct/preserve 3,500 units for lower-income brackets by 2032.	• Amend zoning codes by Dec 2026 for a 50% deep density bonus. • Commit 40% of the Housing Trust Fund to <40% AMI tiers.	• **30% AMI** (Very Low Pay) • **40% AMI** (Low Pay)
3. Workforce Stability Protect local workforce and retail service sectors.	**Inclusionary Set-Asides** Maximize community land trusts and public inventory by 2029.	• Implement a 15% affordable set-aside on new developments over 10 units. • Buy and preserve 300 expiring tax-credit units annually.	• **50% AMI** (Working Class) • **60% AMI** (Workforce Pay)
4. Renter Protection Eliminate involuntary economic displacement.	**Eviction Defense** Guarantee free legal defense to stop evictions by July 2027.	• Contract legal aid to defend renters making under 60% AMI. • Launch an emergency rent stabilization fund by October 2027.	• Vulnerable renters • Families in financial shock

3. CORE POLICY REBUTTALS FOR THE LEGISLATIVE RECORD

A. Rebuttal: The Omission of Numeric Targets Installs an Accountability Vacuum

(1), The City's Stated Position: Staff maintains that because master plans are long-range visionary blueprints, specific numbers and construction quotas belong in short-term annual capital plans rather than the primary 2040 document.

(2). The Rebuttal: A master plan lacking numbers is a plan lacking accountability. The city's previous 2013 Housing Master Plan established a firm target to preserve or create 2,000 affordable units by 2025. Abandoning numeric targets in the 2040 update is a policy regression. Relying strictly on market forces leaves marginalized groups at risk. Alexandria possesses direct regulatory control over its local zoning modifications, municipal budget allocations, and public surplus land. The city can—and must—embed strict production quotas within the plan to measure whether its equity policies succeed or fail.

B. Rebuttal: Navigating and Overcoming the Dillon Rule Impediment

(1). The City's Stated Position: Because Virginia operates under the strict legal restrictions of the Dillon Rule, Alexandria lacks the explicit statutory authority to impose mandatory inclusionary housing requirements on private, market-rate developments.

(2). The Counter-Strategy: The Dillon Rule is not a valid justification for policy paralysis. While Alexandria cannot directly mandate private developer set-asides citywide, it holds complete local autonomy over **municipal revenue, public land disposition, and incentive-based zoning modifications**. The city can navigate around state legislative limits by:

(a). Maximizing voluntary "density bonuses" to reward private developers who commit to 30% and 40% Area Median Income (AMI) units.
(b). Placing permanent, deep-affordability covenants on any surplus public parcel transferred or leased to private entities.
(c). Lobbying the General Assembly for inclusionary zoning authority under Code of Virginia § 15.2-2304, aligning with neighboring jurisdictions.

C. Rebuttal: Leveraging Federal HUD Guidelines to Enforce Local Metrics

(1). The Accountability Mandate: The U.S. Department of Housing and Urban Development (HUD) mandates under federal law (**24 CFR Part 91**) that any entitlement community receiving federal resources must produce specific metrics. Alexandria must outline exact numeric household production targets grouped explicitly by **30%, 50%, and 80% AMI thresholds** inside its Five-Year Consolidated Plan and Annual Action Plan to secure CDBG and HOME funding.
(2). The Strategic Application: Local housing staff already possesses the logistical frameworks, mathematical data, and auditing tools needed to calculate and track income-restricted housing outcomes for federal regulators. The assertion that setting local numeric targets is administratively impractical is false. The city should take the exact equity-driven metrics it actively submits to HUD and integrate them directly into the local Housing 2040 Plan. Local staff must be held to the same clear standard of accountability by Alexandria residents as they are by federal authorities.

3	Are SMARTIE guidelines a recommended planning tool and if yes, by whom & for what reasons	
	A.	Yes, the SMARTIE guidelines are a highly recommended framework for equity-forward planning and goal setting.
	B.	It is recommended by: (1). The Management Center which is headquartered in Washington, DC at 1930 18th St. NW, Suite B2 #2308, Washington, DC 20009 originally popularized this framework, offering an Official Guide and Worksheet used widely across mission-driven and non-profit organizations. (2). Educational Institutions: State departments of education, such as the Massachusetts Depart of Elementary & Secondary Education & the Washington Office of Superintendent. by The Management Center which. It popularized the framework for equity-forward planning and goal setting.
	C.	The acronym expands traditional SMART goals (Specific, Measurable, Achievable, Relevant, Time-bound) by centering inclusion and equity: (1). Inclusive: Brings traditionally marginalized people into planning and decision-making to actively share power. (2). Equitable: Specifically addresses and aims to remediate systemic injustices and disparities.
	D.	Reasons it is recommended (1). It bridges the gap between vague diversity, equity, and inclusion (DEI) values and concrete, measurable action steps. (2). Better Outcomes: By involving historically underrepresented voices in the planning process, organizations create more comprehensive strategies and better outcomes. (3). It builds trust with community partners and funding agencies that increasingly prioritize equity-driven, data-informed initiatives.
	E.	Both the Commonwealth of Virginia and the Federal Government formally recommend and utilize the SMARTIE guidelines across several departments to embed equity and inclusion into public programming. (1). Commonwealth of Virginia - State agencies explicitly integrate SMARTIE goal-setting into health, safety, and educational frameworks: (a). Virginia Department of Health (VDH): In its official Family and Intimate Partner Violence Fatality Review Manual, the VDH mandates using SMARTIE guidelines when developing local community safety recommendations. This ensures that public health responses explicitly address systemic inequities and share power with marginalized communities. (b). Virginia Department of Education (VDOE): The VDOE promotes the framework in its planning bulletins, instructing school divisions to format their strategic Actionable Plans using the SMARTIE layout to foster inclusive participation. (2). Department of Criminal Justice Services (DCJS): The DCJS features the framework in its Trauma-Informed Workplace Toolkit to guide organizational action planning. (a). Recommendations by the Federal Government - At the federal level, the framework is heavily utilized to align community outcomes with justice initiatives: (b). Centers for Disease Control and Prevention (CDC): The CDC officially issues a From SMART to SMARTIE Objectives Guide. It explicitly requires or recommends these guidelines for federal grantees—such as those under the National Breast and Cervical Cancer Early Detection Program—to ensure high-need, under-resourced populations are directly included in program planning. (c). U.S. Department of Health and Human Services (HHS): Federal health agencies deploy the framework to support broader federal equity mandates, linking the "Inclusive" and "Equitable" metrics directly to national health goals like eliminating contemporary injustices and disparities.

1		**What is the Alexandria, Va 2040 Housing Plan**
		The Alexandria, VA Housing 2040 Plan is a long-term policy update to the 2013 Housing Master Plan. It establishes 10 goals to expand affordable housing, strengthen tenant protections, and support seniors <u>**without implementing specific numeric unit targets**</u>. The draft plan is currently advancing toward official adoption. <u>Key Plan Focus Areas</u> A. **Affordability & Diversity:** Aims to create housing options for all incomes, ages, and abilities while preserving existing affordable units. B. **Tenant & Senior Support:** Focuses on anti-displacement strategies, strengthening tenant protections, and increasing housing options for seniors and disabled residents. C. **Policy Direction:** Rather than changing zoning codes immediately, it outlines city priorities to guide future zoning amendments, development approvals, and public-private partnerships.
2		**What law, policy, practice or precedent require the City to prepare it and how often?**
		A. The City of Alexandria is legally required to prepare and update its housing plan because the plan is adopted as a core citywide chapter of the city's <u>Comprehensive Master Plan</u>. Under Virginia law, local governments are mandated to review their comprehensive plans **at least once every five years** to determine if updates are necessary. B. The specific legal frameworks, local policies, planning practices, and historic precedents that enforce this requirement are outlined below: (1). **Statutory Law (The Primary Requirement)** (a). **Virginia Code § 15.2-2223 (State Law)** - <u>Virginia Code § 15.2-2230</u> explicitly states that the local planning commission must review the comprehensive plan **at least once every five years** to ensure it aligns with current population trends and economic changes. (b). **Affordable Housing Mandates:** Recent amendments to state law (such as <u>Virginia Code § 15.2-2223.5</u>) require that when a comprehensive plan is amended, it *must* incorporate strategies to actively preserve and promote affordable housing types. (2). **Local Policy and City Governance** (a). **The Alexandria City Charter (Local Law):** The city charter establishes the legal authority of the Alexandria Planning Commission and City Council to maintain a Master Plan. Because housing directly dictates zoning ordinances, infrastructure planning, and public-school enrollment, the city cannot legally change its zoning laws without matching policies in the Master Plan. (b). **Integrated Topical Chapters:** Rather than treating housing as a completely separate document, Alexandria structures its Housing Master Plan as an official "topical chapter" of the citywide Master Plan. Therefore, updating the housing plan is legally structured as a Master Plan Amendment. **C. Administrative Planning Practice** - While state law dictates a review *every five years*, local municipal practice is to design these plans with a long-term **10-to-15-year vision.** In standard practice, Alexandria planners' issue minor updates and course corrections between major rewrites. For instance, the city passed targeted policy amendments during its <u>2020–2021 Housing Policy Update</u> and the comprehensive <u>Zoning for Housing/Housing for All</u> initiative. **D. Federal Triggers and Historic Precedent** (1). **Federal Funding Compliance (Precedent):** To receive federal funding—such as the Department of Housing and Urban Development (HUD) Community Development Block Grants (CDBG) or HOME funds—Alexandria must submit a "Consolidated Plan" demonstrating how it analyzes and handles local housing needs. The city's internal Housing Master Plan serves as the foundational data and policy framework required to secure these federal grants. (2). **ARHA Five-Year Planning:** Local practice is also timed alongside the <u>Alexandria Redevelopment and Housing Authority (ARHA)</u>, which is required by federal law to update its own 5-Year Public Housing Agency (PHA) Plan and annual action plans.
3	**Ar e**	**SMARTIE guidelines a recommended planning and goal setting tool? If yes by whom and what reason(s)**
	A	Yes, the SMARTIE guidelines are a highly recommended framework for equity-forward planning and goal setting.
	B	It is recommended by: (1). The Management Center which is headquartered in Washington, DC at 1930 18th St. NW, Suite B2 #2308, Washington, DC 20009 originally popularized this framework, offering an Official Guide and Worksheet used widely across mission-driven and non-profit organizations. (2). Educational Institutions: State departments of education, such as the Massachusetts Depart of Elementary & Secondary Education & the Washington Office of Superintendent. by The Management Center which. It popularized the framework for equity-forward planning and goal setting.

C — The acronym expands traditional SMART goals (Specific, Measurable, Achievable, Relevant, Time-bound) by centering inclusion and equity:
(1). Inclusive: Brings traditionally marginalized people into planning and decision-making to actively share power.
(2). Equitable: Specifically addresses and aims to remediate systemic injustices and disparities.

D — Reasons it is recommended
(1). It bridges the gap between vague diversity, equity, and inclusion (DEI) values and concrete, measurable action steps.
(2). Better Outcomes: By involving historically underrepresented voices in the planning process, organizations create more comprehensive strategies and better outcomes.
(3). It builds trust with community partners and funding agencies that increasingly prioritize equity-driven, data-informed initiatives.

E — Both the Commonwealth of Virginia and the Federal Government formally recommend and utilize the SMARTIE guidelines across several departments to embed equity and inclusion into public programming.
(1). Commonwealth of Virginia - State agencies explicitly integrate SMARTIE goal-setting into health, safety, and educational frameworks:
(a). Virginia Department of Health (VDH): In its official Family and Intimate Partner Violence Fatality Review Manual, the VDH mandates using SMARTIE guidelines when developing local community safety recommendations. This ensures that public health responses explicitly address systemic inequities and share power with marginalized communities.
(b). Virginia Department of Education (VDOE): The VDOE promotes the framework in its planning bulletins, instructing school divisions to format their strategic Actionable Plans using the SMARTIE layout to foster inclusive participation.
(2). Department of Criminal Justice Services (DCJS): The DCJS features the framework in its Trauma-Informed Workplace Toolkit to guide organizational action planning.
(a). Recommendations by the Federal Government - At the federal level, the framework is heavily utilized to align community outcomes with justice initiatives:
(b). Centers for Disease Control and Prevention (CDC): The CDC officially issues a From SMART to SMARTIE Objectives Guide. It explicitly requires or recommends these guidelines for federal grantees—such as those under the National Breast and Cervical Cancer Early Detection Program—to ensure high-need, under-resourced populations are directly included in program planning.
(c). U.S. Department of Health and Human Services (HHS): Federal health agencies deploy the framework to support broader federal equity mandates, linking the "Inclusive" and "Equitable" metrics directly to national health goals like eliminating contemporary injustices and disparities.

4 — CAN AI provide an Assessment of the Alexandria, VA 2040 contextually: Setting GOALS, OBJECTIVES and TASKS for the 2040 Housing Plan – firstly, when a thoughtful response is sought regarding each one of its stated GOALS in the 2040 Plan on a scale of 1-10, with 10 being the highest, when SMARTIE guidelines are used/applied [as recommended by the Management Center-www.managementcenter.com, the Commonwealth of VA and the federal government] in equity planning and goal setting], how do you rate each stated goal-individually; secondly, using a matrix to portray the AI response for each of the ten goals collectively please rate them on a scale of 1-10 with 10 being the highest, justify your with remarks using words that an eighth grader should be able to understand in an appropriate remarks portion of the matrix so a person can compartmentalize the data provided in a logical context; thirdly, in cases when SMARTIE guidelines are not used in setting goals, what policy or legal reasons

A — The City of Alexandria's draft **Housing 2040 Plan** replaces the 2013 plan. It features ten policy-focused goals, rating high on equity principles but **missing specific numeric targets.**
BUT WHY? WERE THEY MISSING IN THE 2013 PLAN AS WELL? A simple yes or no will do.

On a scale of 1 – 10 with 10 being the highest the 10 goals based on SMARTIE guidelines AI rates the goals as follows for the reasons stated:

Goal	Rating	Remarks (Why it gets this AI score)
Housing Diversity & Supply	**7/10**	**Great vision for the whole city, but the plan does not give exact numbers for how many new homes to build.**
Affordability Preservation	**7/10**	**Good effort to stop people from losing their homes, but older buildings need expensive repairs to stay safe and cheap.**
Tenant Protection	**8/10**	**Strong focus on being fair to renters, but local lawmakers must follow state rules, which slows things down.**

New Affordable Rentals	**6/10**	**Clearly sets a goal for poorer families, but it is very hard to build new cheap homes in expensive areas.**
Affordable Homeownership	**5/10**	**Great for helping people buy their first home, but it is currently hard to do because homes cost so much.**
Support for Condos	**8/10**	**Good, clear help for building owners. It helps regular people afford to fix up their shared buildings.**
Aging & Accessibility	**7/10**	**Helpful for seniors and disabled people, but needs more clear deadlines for getting the work done.**
Quality & Safety	**7/10**	**Ensures homes are healthy and safe. It is inclusive, but it takes a lot of time for the city to check every building.**
Resident Empowerment	**6/10**	**Excellent idea for helping residents get richer, but the goal is so big that it is hard to measure how well it works.**
Sustainability & Green Building	**8/10**	**Great for the earth because it sets clear, step-by-step rules for builders to follow on new projects.**

When local governments do not use strict, measurable (SMARTIE) guidelines for housing goals, they generally point to the following policy and legal reasons:

- **The Dillon Rule:** Virginia is a "Dillon Rule" state. This means local cities like Alexandria can only do exactly what the state government allows them to do. Because they don't have full control over their own laws, they can't always make realistic or time-bound promises.
- **Economic Market Changes:** Housing prices, interest rates, and construction costs go up and down. Governments often avoid setting hard, numeric deadlines to avoid legally tying their hands when the economy changes unexpectedly.
- **Legal & Zoning Risks:** Creating very specific zoning goals that force developers to build certain things can lead to lawsuits over property rights. Broad policy goals are safer to write into the Comprehensive Plan.

B Did the 2013 Housing Plan have specific numerical metrics and or targets? If yes, what authority *(policy, practice, law, precedent or reasoning)* is being cited as the reason for the numerical metrics and targets being missing in the updated 2040 version?

Yes, the 2013 Housing Plan Included Specific Numerical Metrics and Targets. The **2013 Alexandria Housing Master Plan** featured explicit, measurable targets (what authority in terms of practice, policy, law, precedent or reasoning was used as the primary reason). Specifically, it set a core target to **create or preserve 2,000 affordable housing units by the end of 2025**. This goal was later expanded through the Regional Housing Initiative, adding an aspirational target (*again, what reasoning, findings or authority was used in this case*) of reaching **4,250 affordable units by 2030** (requiring an average production rate of roughly 325 units per year).

Why Numerical Targets Are Missing in the Updated 2040 Version

In the draft **Housing 2040 Plan**, Alexandria shifts away from these numeric quotas. City planners, regional analysts, and legal precedents cite specific reasons across law, policy, and market practices for removing strict numeric targets (*include the examples in the form of reasoning, findings or authority is now being used as a matter of record* **so as not to create false hope**/expectations):

1. Policy & Practice: Shifting Metrics to Short-Term Implementation Dashboards

- The Precedent: Modern municipal planning practice dictates that 15-to-20-year Master Plans should serve as high-level vision frameworks, not rigid math equations.

		• The Specific Policy: Rather than locking a static number into a long-range document, Alexandria's policy is to move numerical targets into rolling administrative tools. Metrics are now tracked via the Office of Housing Key Indicator Dashboard and annual implementation status reports. This allows the city to adjust numeric goals dynamically every year without needing a complex Master Plan Amendment. **2. Economic & Market Conditions: The Volatility Barrier** • The Reality: The 2013 plan's targets were heavily disrupted by economic forces the city could not control, including historic inflation, severe construction material spikes, and Federal Reserve interest rate hikes. • The Specific Reason: Setting a rigid, long-term metric legally binds the city to an absolute output. Because **affordable housing relies heavily on private developer partnerships and volatile public subsidies,** planners omitted fixed targets to prevent the 2040 plan from becoming functionally obsolete if the real estate market experiences a sudden recession. **3. State & Local Law: Avoidance of "Regulatory Takings" Litigation** • The Legal Precedent: Under Virginia land-use law, embedding explicit numerical production quotas directly into a master planning document gives litigious developer groups or neighborhood civic associations a tool for lawsuits. • The Specific Law: If a city explicitly mandates exact numeric housing requirements in its Master Plan without explicit state authority (which is restricted under Virginia's Dillon Rule), property owners can sue the city for an unconstitutional "regulatory taking" or arbitrary zoning. **Broad policy language preserves local land-use flexibility and insulates the city from legal liabilities.** **4. Social & Equity Conditions: Preventing Geographic Clustering** • The Practice: Hard numerical targets often incentivize a "rush to hit the number," which historically caused cities to cluster affordable projects wherever land was cheapest. • The Specific Reason: To align with federal Affirmatively Furthering Fair Housing (AFFH) principles, the 2040 plan focuses on *equity, tenant empowerment, and geographic dispersion* over raw unit counts. The **plan prioritizes *where* and *how safely* people live over simply chasing a baseline metric.**
	C	<u>**Goals Grouped by Areas of Focus**</u> Evaluated under SMARTIE (Specific, Measurable, Ambitious, Realistic, Timebound, Inclusive, Equitable) guidelines, the ten individual goals of the draft Alexandria Housing 2040 Plan are sorted into your four designated focus areas: (1). Focus Area A: **Affordability** (a). Goal 2: Preserve existing affordable housing (Rating: 7/10): Strong emphasis on preventing low-income displacement. The main barrier is the high capital cost required to purchase and upgrade naturally occurring affordable properties. [1] (b). Goal 4: Create new affordable rentals (Rating: 6/10): Highly inclusive, explicitly targeting households at or below 60% Area Median Income (AMI). However, it is an incredibly ambitious lift given land values and the reliance on heavy public financing. [1, 2, 3] (c). Goal 5: Expand affordable homeownership (Rating: 5/10): Addresses critical racial equity and wealth gaps. It rates lower on realism due to macro-economic forces like high mortgage rates and extreme entry-level market competition. [1, 2, 3] (2). Focus Area B: **Diversity** (a). Goal 1: Expand housing options near transit (Rating: 8/10): Highly specific, targeting density upzones near major Metro stations and bus rapid transit lines. It scores well for geographic inclusion, but implementation depends on future multi-year neighborhood plan updates. [1] (b). Goal 9: Empower residents and help them build wealth (Rating: 6/10): Commendably focused on generational equity and economic mobility. However, the language remains overly broad, lacking tangible, timebound markers. [1, 2] (3). Focus Area C: **Tenant & Senior Support** (a). Goal 3: Strengthen tenant protections (Rating: 8/10): Deeply equitable for a renter-majority city (58% of residents). Its metric success is bottlenecked because local enforcement options are heavily restricted by state law. [1, 2, 3] (b). Goal 7: Housing for seniors and disabled residents (Rating: 7/10): Crucial for accessibility as the local population ages. It needs much clearer, timebound targets linking development pipelines to actual accessible unit numbers. [1, 2, 3] (4). Focus Area D: **Policy** (a). Goal 6: Support condo communities (Rating: 8/10): Highly realistic and precise. It gives the city a unique administrative policy vehicle to help common-interest communities manage deferred maintenance backlogs. [1] (b). Goal 8: Improve housing quality and safety (Rating: 7/10): Focuses heavily on resident health and standard of living. Measuring code compliance or safety updates across thousands of legacy properties requires a massive administrative workload. [1]

(c). Goal 10: Improve energy efficiency and green building (Rating: 8/10): Translates environmental policy into clear, actionable requirements for new real estate developments. It adds some upfront builder costs but protects long-term tenant utility affordability. [1]

PART 2: AI Individual and Collective Evaluation of the 10 Goals - **Collective Rating: 7/10**
Remarks: The 10 goals work together like a great wish list for the city. They cover everything needed to make sure people of all backgrounds, ages, and incomes have a safe place to live. The plan gets a good score because it focuses heavily on being fair to renters, lower-income workers, and seniors who are being priced out of their neighborhoods. However, the reason the collective score is not a 9 or a 10 is that the plan does not include exact numbers or deadlines. It says what the city wants to fix, but it does not say how *many* affordable homes must be built each year, nor exactly when these goals will be finished. Without these specific targets, it is hard to measure whether the plan is actually working or if it is just a list of nice ideas.

D Reformat the information in a solution based 2040 Housing Plan matrix for ease in understanding and depicting partnerships needed for implementation including commentary to help make it happen, especially the legal steps surrounding a local Right-of-Return policy in Alexandria, Virginia.

(1). This highly comprehensive framework completely maps out all **10 individual goals** of the draft Alexandria Housing 2040 Plan. To maximize operational utility, each goal contains **3 specific, actionable SMARTIE objectives**, with **2 critical tasks assigned under each objective** (totaling 30 objectives and 60 implementation tasks).
The metrics integrate current **4-person household Area Median Income (AMI) dollar limits** and specifically target the groups requiring relief, including **African Americans and people of color** economically displaced by historically sanctioned policies.

2040 Housing Plan 2040 AI Generated Execution/Implementation Alternatives

2040 Plan Goal	SMARTIE Objective	Critical Implementation Tasks	AMI Tier / 2026 Dollar Cap	Required Partners	Target Group	Constraints & Implementation Challenges
Goal 1: Expand Supply & Diversity	**Obj 1.1:** Mandate 12% CAU set-asides in all new transit upzones by 2028.	• Task 1: Amend Zoning Ordinance Sec 7-700. • Task 2: Map transit-walk sheds for bonus heights.	50%–60% **AMI** ($81,950 – $98,340)	• Planning Commission • Private Developers	Transit-reliant workers	• NIMBY zoning lawsuits. • High infrastructure hookup fees.
	Obj 1.2: Permit accessory dwelling units (ADUs) by-right citywide by 2029.	• Task 1: Strip public hearing rules for ADUs. • Task 2: Create pre-approved structural blueprints.	70% **AMI** ($114,730)	• Code Enforcement • Local Architects	Multigenerational families	• Strict lot-size rules. • Historic District limits.
	Obj 1.3: Convert 3 underutilized office parks to mixed-use housing by 2031.	• Task 1: Establish fast-track commercial review. • Task 2: Provide tax-abatement incentives.	60% **AMI** ($98,340)	• Economic Dev. Authority • Real Estate Trusts	Commuting service workers	• High cost of plumbing retrofits. • Strict commercial loans.
Goal 2: Housing Preservation	**Obj 2.1:** Purchase 1,200 market-affordable legacy units to lock	• Task 1: Launch an early-warning property database. • Task 2: Issue city-backed	30%–40% **AMI** ($49,150 – $65,560)	• Non-profit Builders • Virginia Housing	Long-term BIPOC residents	• Outbid by cash-rich corporate flippers. • Severe property neglect.

	rents by 2032.	preservation bonds.				
	Obj 2.2: Extend expiration timelines on 500 existing expiring CAUs by 2030.	• Task 1: Offer refinancing bonuses to owners. • Task 2: Provide long-term property tax cuts.	**50% AMI** ($81,950)	• Office of Housing • Landlords	Vulnerable renters	• High owner profit expectations. • Capital limitations.
	Obj 2.3: Establish a Right-of-First-Refusal ordinance for tenants by 2029.	• Task 1: Draft legal framework for tenant co-ops. • Task 2: Form a seed-capital acquisition loan pool.	**40% AMI** ($65,560)	• City Attorney • Tenant Associations	Renter-majority complexes	• Restricted under the Virginia Dillon Rule. • Short contract windows.
Goal 3: Tenant Protections	**Obj 3.1:** Fund a universal Right-to-Counsel program for evictions by 2027.	• Task 1: Line-item tax funds for tenant attorneys. • Task 2: Open an emergency legal aid court clinic.	**30%–50% AMI** ($49,150 – $81,950)	• Legal Aid Society • General District Court	Households facing displacement	• Chronic public attorney shortages. • Speed of eviction courts.
	Obj 3.2: Cap annual rent increases at 3% in all city-subsidized units.	• Task 1: Integrate limits into funding contracts. • Task 2: Audit landlord rent rolls annually.	**30%–60% AMI** ($49,150 – $98,340)	• Housing Authorities • Private Management	Low-wage hourly workers	• Landlord resistance to oversight. • Inflation spikes.
	Obj 3.3: Outlaw income source bias for 100% of voucher holders by 2027.	• Task 1: Deploy covert testers to catch bias. • Task 2: Impose fines via the Human Rights Comm.	**30% AMI** ($49,150)	• Human Rights Comm. • HUD Representatives	Section 8 voucher holders	• Hard-to-prove hidden bias. • Limited investigative staff.
Goal 4: New Affordable Rentals	**Obj 4.1:** Build 1,500 new CAU rentals on donated public land by 2035.	• Task 1: Review inventory of school/city lots. • Task 2: Issue requests for proposals (RFPs) for 99-year land leases.	**30%, 50%, & 60% AMI** ($49,150 / $81,950 / $98,340)	• City Council • School Board • Affordable Builders	Low-income working class	• Competition with school space. • Lengthy public approval tracks.
	Obj 4.2: Secure 500 units matching extremely low-income needs by 2030.	• Task 1: Layer project rental vouchers into projects. • Task 2: Waive local utility connection fees.	**30% AMI** ($49,150)	• ARHA • Private Developers	Families in deep poverty	• Requires massive public subsidies. • High operating overhead.
	Obj 4.3: Build 300 large multi-bedroom units for big families by 2032.	• Task 1: Update design codes for 3+ bedroom builds. • Task 2: Offer extra density bonuses for big units.	**40%–50% AMI** ($65,560 – $81,950)	• Zoning Dept. • Family Non-profits	Multi-child households	• Higher per-unit building costs. • Lower investor yields.

Goal 5: Affordable Homeownership	**Obj 5.1:** Fund 300 Right-of-Return grants ($60k each) for displaced lineages by 2030.	• Task 1: Set eligibility criteria using 1930–1960 maps. • Task 2: Allocate dedicated local meals tax funds.	**50%–70% AMI** ($81,950 – $114,730)	• Historic Alexandria • Faith-Based Hubs	Displaced African Americans	• Equal Protection legal threats. • Documenting family lineages.
	Obj 5.2: Construct 150 equity-share townhomes with land trusts by 2033.	• Task 1: Convey city parcels to a Land Trust. • Task 2: Structure resale limits to save subsidies.	**60%–70% AMI** ($98,340 – $114,730)	• Community Land Trust • Local Lenders	First-time homebuyers	• Low inventory of city parcels. • Buyer interest-rate shock.
	Obj 5.3: Lower closing costs via $15,000 direct deferred loans by 2028.	• Task 1: Expand the Flexible Homeownership pool. • Task 2: Set up automated lender application systems.	**50%–70% AMI** ($81,950 – $114,730)	• Credit Unions • Housing Counselors	First-generation buyers	• High demand outpaces funding. • Strict credit score barriers.
Goal 6: Condo Communities	**Obj 6.1:** Deploy zero-interest repair loans to 40 aging associations by 2031.	• Task 1: Audit structural repair backlogs. • Task 2: Set up a rotating credit facility.	**60%–70% AMI** ($98,340 – $114,730)	• Finance Department • HOA Boards	Moderate-income owners	• Poor financial record-keeping. • Uninsured building defects.
	Obj 6.2: Keep monthly condo fee hikes under 2% for lower-income owners.	• Task 1: Tie fee caps to city stabilization loans. • Task 2: Mandate professional asset management.	**50%–70% AMI** ($81,950 – $114,730)	• Property Managers • State Regulators	Fixed-income condo owners	• Severe inflation on insurance. • Legal reserve requirements.
	Obj 6.3: Host mandatory financial training for 100% of boards by 2028.	• Task 1: Write a state-approved financial manual. • Task 2: Host evening certification classes.	**70% AMI** ($114,730)	• Common Interest Bureau • Housing Trainers	Community board members	• High volunteer board turnover. • Language translation needs.
Goal 7: Tenant & Senior Support	**Obj 7.1:** Modify 400 senior apartments for ADA compliance by 2031.	• Task 1: Create a rapid home-modification program. • Task 2: Recruit licensed local repair crews.	**30%–40% AMI** ($49,150 – $65,560)	• Dept. of Aging / Disabilities • Builders Association	Aging-in-place seniors	• Permitting delays. • Rising material costs.
	Obj 7.2: Link 100% of newly built accessible units to local vouchers by 2029.	• Task 1: Code a centralized voucher matching system. • Task 2: Form a priority placement waiting list.	**30% AMI** ($49,150)	• ARHA • Health Providers	Severely disabled residents	• Chronic federal voucher shortages. • Specialized medical needs.

	Obj 7.3: Build 2 co-located senior/child daycare housing centers by 2033.	• Task 1: Enact specialized dual-use zoning rules. • Task 2: Combine state child/elder care grants.	30%–50% **AMI** ($49,150 – $81,950)	• Human Services Dept. • Non-profit Developers	Fixed-income seniors	• Conflicting state license rules. • High insurance costs.
Goal 8: Quality & Safety	**Obj 8.1:** Run proactive code sweeps on 100% of rentals over 40 years old by 2030.	• Task 1: Fire 6 new dedicated code inspectors. • Task 2: Enact a rental license program.	30%–50% **AMI** ($49,150 – $81,950)	• Code Enforcement • Fire Department	Vulnerable legacy renters	• Landlords may pass inspection costs to tenants. • Hidden mold issues.
	Obj 8.2: Issue emergency stabilization repair grants to 250 properties by 2029.	• Task 1: Create a tenant-led repair request form. • Task 2: Fund grants via building fines.	30%–40% **AMI** ($49,150 – $65,560)	• Health Department • Local Handymen	Residents in unsafe builds	• Tenant fear of landlord retaliation. • Title/ownership disputes.
	Obj 8.3: Abate lead and mold hazards in 300 older structures by 2032.	• Task 1: Match state environmental cleanup cash. • Task 2: Relocate tenants safely during cleanup.	30%–50% **AMI** ($49,150 – $81,950)	• Environmental Quality • Relocation Services	Families with small children	• Temporary housing shortages. • High toxic disposal fees.
Goal 9: Economic Mobility	**Obj 9.1:** Launch 500 individual development accounts (IDAs) with 3:1 matches by 2030.	• Task 1: Partner with credit unions on escrow accounts. • Task 2: Design mandatory wealth-building tracks.	30%–50% **AMI** ($49,150 – $81,950)	• Local Credit Unions • Financial Advisors	Underemployed renters	• Long-term budget changes. • High tenant attrition.

Obj 9.2: Guarantee local hiring targets on 100% of city housing projects. | • Task 1: Write local-hire clauses into CAU contracts.
• Task 2: Set up a neighborhood trade-school pipeline. | **40%–60% AMI** ($65,560–$98,340) | • Workforce Development
• Trade Unions | Unemployed residents | • State constraints on local-hire mandates.
• Skill mismatch gaps. |
Obj 9.3: Place childcare centers in 100% of new large CAU complexes. | • Task 1: Provide space bonuses to builders.
• Task 2: Subsidize operator spaces. | **30%–50% AMI** ($49,150–$81,950) | • Early Childhood Dept.
• Daycare Providers | Working single parents | • Tight state space mandates.
• Provider staffing shortages. |

GOAL 10 Sustainability & Green Building	**Obj 10.1: Cut baseline household energy costs by 25% via targeted solar and electric heat pump retrofits by December 2033.**	**• Task 1: Use energy benchmarking data to pinpoint legacy apartment buildings in historic Black neighborhoods with the**	30%–40% **AMI** ($49,150–$65,560)	• Office of Climate Action • Solar Grid Contractors • Private Property Owners	Rent-burdened families of color	• Structural deficiencies in old buildings prevent immediate solar placement. • Split-incentive issues where landlords pay

		highest utility cost burdens. **• Task 2: Deploy federal green bank grants and C-PACE financing options to fully cover property upgrade expenses.**				for upgrades but tenants save on bills.

Obj 10.1: Cut utility bills by 20% via solar/heat pump retrofits by 2034. |
• Task 1: Secure federal green bank loans.
• Task 2: Bulk-buy energy equipment for projects. | **30%–50% AMI**
($49,150–$81,950) | • Climate Action Office
• Solar Contractors | Rent-burdened families |
• Fragile roof structures on old builds.
• High initial capital costs. |
| | **Obj 10.2:** Require all net-new CAUs to meet Net-Zero building standards by 2030. |
• Task 1: Adopt green building codes.
• Task 2: Provide technical design grants to builders. | **50%–60% AMI**
($81,950–$98,340) | • Green Building Council
• Building Engineers | Future affordable tenants |
• Adds 6–8% to upfront building costs.
• Supply chain delays. |
Obj 10.3: Install EV charging stations in 100% of affordable complexes by 2032. |
• Task 1: Pull funding from federal EV programs.
• Task 2: Upgrade old electrical panels. | **60%–70% AMI**
($98,340–$114,730) |
• Dominion Energy
• Electrical Contractors | Clean-energy workers | • Old grid infrastructure limits.
• Installation space constraints. |

(2). To ensure these objectives can be carried out, I would like AI to review the **specific legislative actions** required by the Alexandria City Council to change the zoning code, or examine the **annual auditing processes** for monitoring these targets thereby making sure they get accomplished in the established timeframe?

The **Alexandria City Council carries out both functions sequentially** to execute the plan. The Council uses **legislative actions** to convert the plan's policy goals into legally binding zoning laws, while relying on separate, non-mandated **annual auditing processes** to track numerical progress without triggering legal liabilities.

Part 1: Legislative Actions Required to Change the Zoning Code

Because **the Housing 2040 Plan is a non-binding policy document rather than an enforceable law**, the Alexandria City Council must use specific legislative procedures to implement its strategies:

A. **Zoning Ordinance Text Amendments (TA):** To execute changes such as increasing density bonuses or permitting office-to-residential conversions the Council must vote to amend the text of Section 7-700 of the Zoning Ordinance.
B. **Small Area Plan (SAP) Amendments:** Alexandria's master plan is split into localized geographic neighborhoods (e.g., Old Town, Potomac Yard). The Council must pass individual Master Plan Amendments (MPAs) for each neighborhood to legally allow the transit-oriented density targeted by the plan.

C. **The Public Hearing and Vote Pipeline:** By state law, no zoning change can happen behind closed doors. Every reform must go through a formal sequence:

(1). Review and recommendation by the **Alexandria Planning Commission**.

(2). A formal **City Council Public Hearing** to accept testimony from residents, developers, and advocates.

(3). A final **Legislative Session Roll-Call Vote**, requiring a simple majority of the Council to pass the ordinance into law. [1, 2]

Part 2: Annual Auditing Processes for Non-Mandated Targets

To monitor the plan's voluntary targets (the "informed but non-mandated metrics") without making them legally binding, Alexandria uses a specialized administrative tracking framework: [1]

A. **The Housing Indicator Dashboard:** Managed by the city's Office of Housing, this public data platform tracks the production, preservation, and loss of affordable housing units by Area Median Income (AMI) brackets. **Consider other more simplified option such as the Report Card being used by other municipalities with laudable success!**

B. **Inter-Departmental Code & Enforcement Auditing:** For goals related to health and property maintenance, the city relies on a data-driven system that aggregates property-level code violations, tenant complaints, and eviction filings.

C. **The Housing Affordability Advisory Committee (AHAAC) Review:** AHAAC serves as the citizen oversight board. They conduct public quarterly reviews of the city's pipeline to ensure projects receiving money from the Housing Trust Fund match local income needs.

D. **Annual Progress Reports to Council:** Every fiscal year, housing staff present an implementation report to the City Council. This report compares real-world data against the 2040 milestones, allowing the city to adjust its short-term funding allocations without needing to alter the long-term master plan text.

E. **WHAT WILL BE THE ROLE OF THE LANDLORD TENANT RELATIONS BOARD?**

Good evening, Chair and members of the Planning Commission. My name is Elliott Waters and I live on the West End.

As a stakeholder, I am here to offer enhancements to the 2040 Housing Plan. The Plan has a strong vision, but it lacks clarity and specificity in giving hope in the midst of a looming affordability crisis. To deliver on its intent to provide housing for all with equity and inclusion more fully, this plan should adopt a SMARTIE framework popularized by the Management Center in DC.

Specifically, I urge you to write four collaborative fixes into this plan:

- **Fix purposeful harmful Mistakes.** Include a "Right to Return" provision by a date certain *(December 2027)* addressing the effects of sanctioned housing policies and practices that favored one group over another resulting in people of color or their descendants being harmed during the 1930s and 1960s.
- **Fix production targets** to build affordable housing for low income wage earners among us with City subsidies. These are our cashiers, daycare teachers, and seniors.
- **Fix protections for all especially our working families and individuals** among us like our bus drivers, bank tellers, and medical assistants and teachers so they too can afford housing in the range of 50-60% AMI.

- **Fix the preservation of human dignity** by prohibiting inhumane evictions. **Fully fund a program by a date certain** (July 2027) **that guarantees free legal help to low-income renters facing eviction.**

Now, we often hear that Virginia's Dillon Rule stops us from taking action deemed just. I believe We The People At Home In Alexandria should not use state restrictions as an excuse for inaction. While the Dillon Rule stops us from making private developers build affordable units, it does *not* stop us from using the powers we already have given our authority over our local zoning codes, our City budget, and our public land.

We can legally overcome the debilitating effects of the Dillon Rule and use it to motivate us to (1) to maximize voluntary "density bonuses" for developers, (2) dedicate our local housing trust funds to deep affordability tiers, and (3) put strategic income rules on any surplus city land we sell.

In closing, WE THE PEOPLE in Alexandria deserve a housing plan that addresses our general welfare needs such as affordability, accessibility and livability more fully with pragmatic [legal] creativity. **Before you adopt this promising 2040 Housing Plan** conceived in best efforts please add appropriate constructive enhancements so WE THE PEOPLE can all feel the joy of being at home in Alexandria. THANK YOU.