

City of Alexandria Regional Fair Housing Plan Comments Consolidated (COG website & email)

Webform:

Stephen Milone, 907 Prince St 22314, milonesteve@gmail.com

- I oppose this plan as it is written and being enacted. This document and plan lacks cohesiveness and equity amongst the so-called 'participating' jurisdictions. The plan calls for adding 10s of 1,000s of new housing units. In the City of Alexandria, where I have lived and owned my home for decades, and that is already the densest jurisdiction in the State of Virginia, and one of the densest cities in the U.S., we have added 1,000s of new residential units while many of the surrounding jurisdiction claim the weakest achievements that barely move the needle of providing increased affordable units. In comparison, other jurisdictions, as the highlight of their achievements over many years, cite in one example that they hired a bilingual housing counselor, and for another jurisdiction that they hired a fair housing inspector that conducted a handful of inspections, and in another that they provided several hundred rides to homeless. All of those things are important and should be done, but also very basic, expected, and do not alleviate any of the housing needs. While the City of Alexandria has added significant numbers of housing units, they are only 5% affordable and 95% market rate units financially inaccessible except by the richest residents and far from the goal of 75% affordable and without the required supportive infrastructure, including schools, open space, tree canopy, diminishing residents' health and quality of life.

North Ridge Citizens Association, PO Box 3242, 22302, info@northridgecitizens.org Please see comments in attached PDF. Thank you.

Yvette Jiang, 22304, yvettejiangalexandria@gmail.com

- I hope to see additional research in how fair housing affects women: for example, single mother with children, women experiencing homelessness, domestic violence, sexual assault, women of color, and non-binary residents, as well as women who are also seniors, disability and/or low income.

John Fehrenbach, Alexandria 22302, John@fehrenbach.biz uploaded letter (comments on regional and Alexandria sections).

Owen P. Curtis, 5465 Fillmore Ave., Alexandria 22311, opctiger72@aol.com see uploaded file

Fran Vogel, 22304, fran.vogel@verizon.net

- There is no recognition of the density Alexandria already has, and the report speaks of resident opposition to further density as obstacles to COG's plan for our city, rather than acknowledging that residents of a city should have a voice in how their city grows. COG seems to believe they have a better understanding of what residents in our city want, and believes they should dictate our future from a regional perspective, while this report demonstrates little factual knowledge of Alexandria. We are not Fairfax, Loudoun, or Montgomery County with miles of vacant land, and the report treats our dense city as a land area that has unlimited possibilities for development. I take exception to COG dictating supposed recommendations for increased density for City of Alexandria. The way affordable housing units is calculated leaves a very few units set aside for affordable units so in a building with 300 units total, only 5 will be set aside as affordable. That will require hundreds of buildings to be built. This is unsustainable on many

levels, especially in providing the city services necessary to provide for those residents and the city as a whole. Moreover, residents and taxpayers were not involved in the formulation of the COG recommendations. What is clear is that COG is providing a means for developers to come in en masse to build at their hearts' content sanctioned by Alexandria City Council. One developer commented at a public meeting, Alexandria is a developer's paradise!!! THIS is what COG is sanctioning, unchecked density with the loss of green space, tree canopy, increased impermeable surface area with loss of quality of life, increased traffic congestion (no people are NOT giving up their cars), overcrowded schools and failing city services.

Norma A Burton, 300 Yoakum Parkway Apartment 902, 22304, norma_burton@yahoo.com

- I have been denied public housing for over 10 years. My rent keeps going up. I am getting older (60+) and the discrimination continues. I am sure we are discriminated against because we are an older mixed couple. My husband both work, we have never been late with our rent. We worked during COVID, with no financial help. We are trying to stay in Alexandria City however it is impossible with the rental rates, and our inability to buy a home.

Regional sections/Alexandria – Daniel Green, 814 Crescent Drive, Alx 22302, digreder@gmail.com

- Overall, it is very difficult to find a well defined plan in these hundreds of pages. I understand its goal is to make housing more affordable through government funding sources, but what about private funding, homeowner rights, and maintaining the quality of our neighborhoods? - All are not addressed. Plans like this have often failed across the nation. I'm from Minnesota and can talk about how the plans have failed in Minneapolis. If we look to provide economically affordable and subsidized housing in affluent neighborhoods, this may lead to a long term economic decline of our best neighborhoods. Bottom line, it is not clear what the plan is, its end state, and when and where it will occur. Additionally, what are "as-of-right Accessory Dwelling Units" and what does it mean? I understand Accessory Dwelling Units, although I don't know if they are well suited in many of our neighborhoods, but what is "as-of-right"? It is not defined and may imply something that it should not.

Jim Lowenstern, 3450 Terrace Ct # 1044, 22302, zuboguy@aol.com

- God luck , with trying to get more affordable housing, most developers want to maximise profit , so the affordable housing appears to be token, Had a argument or discussion years ago, with a smart growth leader and was hoping or favoring more inexpensive, but safe building techniques, There is a group in New Mexico, who use tires and mud to make earth houses , not in building code, there is also primitive to way to use almost trees to build houses (historic on east coast), If it costs less to build (still within structure safety) it should cost less to buy, In Arlington , some people , think that the new zoning will let people build 2 houses where there is one, i believe Your view in Alexandria is to enable more people to live in some what affordable housing (with higher density rules) .Near where i live , on the other side of Nova, development was built , with more impervious surface, that the buildings before, not as much flooding where i am out, issue elsewhere use good judg

William Rossello, 22314, bill.rossello@gmail.com

- Anyone who prefers to live in a neighborhood, and has the means to do so, can live there. There are no other barriers by race, sex, or any other designation. That has been the case in Alexandria for more than 50 years. To use words like segregation in 2023 seems to ignore legislation at both the national and local levels, the over 50 year commitment of Alexandria to housing initiatives, and the increasing diversity of Alexandria's neighborhoods outside of Del Ray. The draft plan would have been more relevant in 1968, but the realities of diversity trends in Alexandria obviate the need for the more radical proposals it contains. And there is no groundswell in Alexandria for increased density that is the most dense in the area, save maybe DC which is only slightly more dense. To the extent density is needed to make housing more affordable, it is time for our neighboring jurisdictions, particularly the large area counties to step up. They boast density rates 20% or less of Alexandria's.

S.B. Anonymous, 22314, anonymous@tutanota.com

- The fair housing goals and priorities in this report are misguided and I do not support them. The most effective solution to reduce burden on low income residents and expand housing for all is to increase the supply of market rate housing. Increasing local government oversight and taxpayer funded programs is unfair, irresponsible, and ultimately unproductive. Simply reduce government intrusion in developer activities, allow private property owners to build accessory dwelling units, make permits easier and cheaper to get, reduce property taxes, and turn over all city owned public housing to private developers that will build affordable market rate apartments that can fit many more people into the same square footage footprint.

Tom VanAntwerp, 22301, tom@tomvanantwerp.com

- I feel that these proposals focus too much on marginal improvements. Some tax breaks here, a new regulation there, maybe a teensy bit of zoning reform. The best way to improve access to fair housing is to build housing. Lots of it. Restrictive zoning across the region has been a huge contributor to the housing crisis, with local input of every imaginable project a close second. I would love to see local governments pursue dramatic zoning overhauls. - Eliminate restrictive single-family zones and replace them with broad residential zoning. - Any type of residence, from SFH to high-rise, should be allowed in a residential zone by-right. - Few, if any, developments should ever require city council approval. NIMBY opinions should fall on deaf ears. We don't discuss fair access to bread or t-shirts, because they are cheap! They are cheap, because they are plentiful. Make housing plentiful, and the fairness inevitably follows. Please, make building legal!

Arthur Impastato, 239 medlock lane, 22304, aimpastato239@gmail.com

- Cities should not be changing zoning and increasing density through affordable housing since it adversely affects the majority of residents through increased traffic, overused or insufficient infrastructure, displaces fixed income seniors and the disabled, destroys neighborhood diversity, destroys tree canopy, destroys open space, increases rainfall, and degrades the environment within city limits and increases health risks for those living within them. Changing zoning mainly benefits developers, takes money away from being spent on improving existing affordable housing, and generally results in only rental housing thereby doing little for those who wish to

buy property and raise a family. Studies and data in Alexandria demonstrate that, in spite of increasing density, the price of land and housing actually goes up. In short, the data tends to show that changed zoning and increased density make our cities less healthy and less desirable places to live.

Geri Baldwin 431 South Columbus Street 22314, geribaldwin@ymail.com

- Today's standard of affordable housing bending the edges more so for affordable housing is critical as much as greatly in need as to many factory., I believe it's an issues need to be address more clearly with the concept of ones welfare of safety and healthy environment., With high inflation and lost of jobs many going from high paying jobs to a more lesser and applying for Government Assistance for first time and as some having to move in with family member or friend until getting back to ones self-esteem, as to this having to apply for assistance for food helping pay electric and or end up staying in /living in shelter... The HUD criteria of it's guild line for financially assistant through HUD and it's standard of qualification and helping those of whom in need as to it's guild line., and any other assistance is greatly in need for affordable housing. Sincerely Geri Baldwin Member of Landlord Tenants Relations Board

Alison O'Connell, 1008 N Vail St, 22304, a.oconnell.87@gmail.com

- I am very glad to see my local government and others in the region focus on this. I think your zoning efforts are great, and more affordable housing needs to continue to be built. I would encourage you to do all you can to reverse the deals given to Amazon when they set up their headquarters here. We are paying them to bring in more residents and strain our already overburdened housing system. They should be paying in, not receiving funds. I see that you have placed a high priority on making public transportation more accessible for disabled people. One serious barrier is that many disabled individuals are immunocompromised, myself included. It is not safe to take the bus because of the lack of COVID safety measures. Mandatory masking is the bare minimum to making spaces more accessible. If you don't do that, you're already failed.

Joseph Markoski, 210 Woodland Terrace, 22302, joseph.markoski@comcast.net

- I support using public funds to create additional affordable housing in Alexandria, as well as the use of eminent domain to acquire property on which to build such housing. I also support putting real pressure on new developers to provide long term affordable housing units, rather than the inadequate commitments the City has heretofore accepted. I am totally opposed, however, to the elimination of single-family zoning in areas where it currently exists (which were not developed with multi-unit dwellings in mind). Allowing multi-family dwellings in such neighborhoods will exacerbate on-street parking and traffic congestion, further reduce our ever-declining green space and tree canopy, and increase impermeable acreage (further burdening our already inadequate storm water infrastructure). Moreover, there is no demonstrable evidence that new multi-family dwellings in such neighborhoods will actually be priced at affordable levels. There are better solutions that we should pursue.

Kaitlin Turck, 1200 Braddock Place, Apt 704, 22314, kturck@gmail.com

- I agree that the region does need to take serious steps to reduce growing segregation and unequal access to services. As a homeowner in Alexandria, I would prefer to see my neighborhood in Old Town North build more accessible housing rather than multi million dollar homes and condos. I grew up in a very diverse Alexandria and I no longer see that same diversity around me.

NORMA A BURTON, 300 Yoakum Pkwy, Apt 902, 22304, norma_burton@yahoo.com

- I have lived in the City of Alexandria for over 20 years. I retired from Verizon brought a house, moved to Rocky Mount Alexandria. After 3 years I moved back to Alexandria. Rocky Mount was too depressed. No decent jobs. I was living off my retirement savings. Since moving back to Alexandria its been a struggle. I have not been able to get low income housing, even though I make less than the area median income. I tried to buy a home however, they say my credit is too low. My partner and I are both over 60 years old, and have a combined income of \$120,000.00. The housing are given to people with kids, low income residence. It seems like their are no recourse if you are middle income with no kids. Or if you are over 50. It is very frustrating that after years of living in the city, I cannot afford to buy in the city even though our rent is way more than a mortgage would be. There is no fairness for single, middle-aged, - middle income individuals, or couples.

Jennifer Hudson, 22314 jennifer.o.hudson@gmail.com

- First generation homeowners and first-generation college graduates in this area need down payment and financing support in order to achieve the dream of homeownership and more programs to access affordable housing. This group comes from families with little to no assets, education, wealth, but manage to secure jobs with salaries that make them ineligible for assistance. At a great disadvantaged, this group has little assets and no blueprint or family hfinancial support to be able to secure homeownership. This group can greatly contribute to the city as residents but are left with little option but to relocate. Are you doing anything specifically to include or address the barriers these residents face in Alexandria City housing market?

Elliott Waters, 325 Cameron Station Blvd, 22304 waters325@comcast.net *No comment submitted*

Wanda Burrell, 9414 Sandy Creek rd, Fort Washington 20744 gianni.b09@gmail.com

- Would love to live in Alexandria/Fairfax but there are no affordable homes . Please study building small 2-3 bedroom 2 1/2 bathrooms detached energy efficient small homes ðŸ™; make them with small yards wooden privacy fences for privacy and families also would be nice to see introduction to Tiny homes on solar and energy efficiency for singles and small families and disabled People and both have strict HOA rules and put a cap on the HOA fees also and make it so you have to earn 30k-80k alone or 2 people household .No rental homeownership only please priced at 200k-400k also they could just be two level homes with standard energy efficient appliances open kitchens into family rooms every one is not looking for a huge house just a safe and affordable home thank you for letting add my input

Email to fairhousing@mwkog.org

Nancy Jennings nrjennings@me.com

- This won't work and will destroy any mobility in the transportation system. The City of Alexandria is already too dense and unable to provide services to its residents.

Nan Jennings
2115 Marlboro Drive
Alexandria, VA 22304

Maria Taub <taubmaria25@gmail.com>

- To whom it may concern:
- I believe that well maintained parks and streets that include green areas can make a difference in the quality of life of its residents. I live in Alexandria, VA and the areas populated by wealthy residents and those where less affluent people live differ significantly. Cities should look at solutions implemented elsewhere in the world, for example Singapur. Our cities should contribute to the health of our planet.

[Singapore Green Plan 2030](#)

[How Singapore became one of the Greenest Cities in the World: 5 Key Reasons - Cities Future](#)

Thank you.

Address: 309 Yoakum Pkwy. Apt. 1208
Alexandria, VA 22304

Ann Shack annshack@earthlink.net

As a resident of Alexandria City, here are some notes I made while reading the fair housing committee's "goals":

1) Increased Density -

This is the issue that will be the most difficult for current residents to accept.

*For one thing, residents' ideas have not been surveyed.

*For another, there are many new apartment buildings that have been built here which still have empty units.

*For a third, our infrastructure has not been improved, and our basic system can not support increased density. In fact, we have had flooding issues all over the City for years and, while the City has a fund for keeping the pipes cleaned out and repaired, they have not keep their promise. Only this past year did they actually use the funds. Many homes were flooded multiple times because the City did not keep its promises. So why should residents believe them now?

*For a fourth, the new buildings do not have the historic facade. They are the lease expensive ways to build -- ugly and with no personality. And since the one closest to me will remove lots of small businesses here, they will build high rises and only get 22 affordable housing units. Why should we residents allow that? To us, this is not a reasonable trade off.

2) Too many projects are schedule in a vacuum. Random areas have been selected without looking at the impact on the neighborhoods. Traffic is already a nightmare in many areas of the City. These need to be fixed BEFORE ANY new developments can even be considered by residents. REMEMBER it is our taxes that are supposed to cover these issues.

3) Too many projects are scheduled to be constructed at the same time within blocks of each other. The City does not have the personnel to handle this and the residents need to be able to get back and forth to work, schools, etc. in order to pay the taxes.

4) As a Real Estate Consultant, we know that affordable housing is a farce. It only increases the cost of housing in an area. So you can never catch up. The developers are the only winners here...they expect a large ROI and in today's market, they will get it.

5) Education is the key to moving out of poverty. The schools in Alexandria are already far too crowded, and many residents complain that the education needs to improve. Many of the schools need repairs which have never been handled. How will Alexandria handle all the additional children who need to attend school here when the density housing exists? I haven't seen or heard about any plan from the City which would be included with each new building.

6) Washington DC has a plan to allow voucher assistance to be used toward purchasing a home. Alexandria should consider this as well. This allows people who need help to get the real growth out of poverty.

7) There needs to be follow up when people rent an existing condo or a potential new purchase. I have known of cases where a townhouse was rented to a family and the family painted the carpets, drew on the walls, and did other destruction. Are there resources to take care of these expenses? Are there personnel to check up on the renters? I don't think so. This is part of the problem.

8) We used to have a subsidized taxi service here in Alexandria City to help elderly

and sick people get to doctor appointments and other places. This disappeared.
It needs to be re-instated.

I deliver Meals on Wheels weekly and I see some of these disabled people. We may want to help them, but Alexandria does not make it easy for us to know what we can do - either individually or as a City benefit.

9) The City of Alexandria has gone out of its way to avoid notifying residents about changes it wants to make until it's too late for residents to comment or make suggestions.

And when residents want to participate, very few residents in an area have been notified so they are intentionally ignored. I blame the Planning & Zoning Department and Commission for this. It is not ok to change zoning regs without residents' approval. This is also part of the issue with density.

10) There are many existing office buildings that can be re-purposed. If they are not suitable for conversion to apartments or condos, they should be converted to schools or offered to new and existing small businesses as incubators. Let's not sell out to developers when we can use existing facilities for far less.

Poor people and others need to understand what it means to own their own businesses, rather than just work for others. Fairfax County is doing a lot to help people learn about this and get into business. Anyone looking at what they are doing? I just learned about an entire department they set up to help those who want to have their ideas and

create new companies -- including SCORE and other Government resources.

11) Pave the streets! Alexandria City is spending money for new transportation options but we need to drive on existing streets now. Washington Street handles cars, buses, and trucks - why hasn't this been paved yet?

12) The attitude of the Major and City Council in Alexandria City seems to be "if you don't like it here, move". Well, if a lot of people moved out of here at the same time, where would the tax revenues come from? Be careful what you wish for.

This is not just a NIMBY push-back. We residents purchased here expecting the City to respect us. That's not happening. We are not included in the discussions about locations; affects upon the neighborhood, the look of the new buildings, etc. Cooperation -- not authority dictation -- will help move the City closer to what it wants to do. And since Alexandria has been losing population since 2020 (according to the census data), there is time to do this right.

This represents the majority of my thoughts, since I can not attend the meeting on Friday, March 31st. I would like to see or hear a transcript of the meeting please.

Respectfully submitted,

Ann Shack

Via email to Alexandria staff (sent by Kim Cadena 3/29/23):

Hi Diane,

We've gotten a few comments on the Fair Housing Plan that were submitted directly to us verbally. I'm going to put them below so you can add them to the other comments received. I've quoted directly for the comments we have that were recorded, but the rest are paraphrases. I've also included as much contact and other information as I have.

- Bonnie Naugle, Chair of Landlord Tenant Relations Board (at Arlandria community meeting) <bonnie.naugle@gmail.com>: It is very hard to find three-bedroom rentals in the City. It is a real challenge for families to access the local rental market.
- Steve Walz, President of Lynhaven Civic Association (at Federation of Civic Association presentation): It would be helpful to see a more robust discussion of climate/energy issues, rather than having air quality as the sole environmental factor assessed. Also, I believe the report should include an analysis of the impact of short term rentals removing rental housing options from the overall market.
- Frank Putzu, Federation of Civic Associations: The tone of the report is troubling, including its point of view that single family home zones are "racist" by their nature. Some issues raised in the report should be acknowledged, but it is also important to note that the City is not bound by the analysis, findings or recommendations of COG or its consultants. (Mr. Putzu also wrote a [letter to the editor of the Alexandria Times](#) on the Fair Housing Plan)
- Ken Notis, 22302, Livable Alexandria:
 - New market rate has shown to impact affordability at all levels, we need to make sure that policies such as inclusionary zoning doesn't hinder production of market rate housing
 - We should fund more affordable units through general fund so other newcomers to the city will not be shut out due to inclusionary zoning
 - City should consider parking reductions at affordable housing development
- Alex Goyette, 22304, <alexmgoyette@gmail.com>:
 - Solutions section underwhelming, not aggressive enough to address the issues. Solutions such as addressing minimum lot sizes are a good first step, but more aggressive policies are needed to reduce barriers and increase affordable housing
- Natalie Talis, 22304, self/Alexandria Health Department, Natalie.talis@vdh.virginia.gov:
 - Appreciates focus on housing for people with disabilities
 - Encourages a focus on universal design, such as at Wesley Housing, and increased numbers included in units

- Kathie Hoekstra, 22312, 391deltacharlie@gmail.com:
 - Climate action group?
 - Vast majority of pollution comes from buildings due to density. When talking about affordable housing, would like to focus on energy efficiency in new affordable housing
- Kursten Phelps, 22304, kursten.phelps@gmail.com:
 - Encourage continued efforts to reach limited English speakers, including instructions on how to comment
- Roy Byrd, 22314, rrbyrd@comcast.net:
 - “A general comment with respect to ADUs, I’m just concerned that if not watched closely (and I understand the City is limited in terms of code enforcement as it is), but a concern that this could be a venue for substandard housing for those who are unable to afford better housing that from a code stand point it’s more minimum requirement than what would be required with an apartment and the number of individuals that could be living in an ADU. It’s just a concern that as you try to do something good, you open up a door where you unintentionally may do more harm to folks than you intend.”
- Carter Flemming, 22302, Alexandria Federation of Civic Associations, carterflemming@gmail.com:
 - “I want to clarify that the 3 Alexandria goals were not really developed by the Alexandria representatives, but were developed by the COG consultants, so they may not actually be our priorities.”

March 29, 2022



To Whom It May Concern:

Tenants and Workers United (TWU) is a registered 501(c)(3) nonprofit organization that has worked with low-income communities of color in Northern Virginia for over 35 years. We serve people with intersectional identities: people of color, women, Hispanics/Latinos, LGBTQIA+, immigrants with varying immigration statuses, elderly, and people with disabilities. Most of the people we serve have low-wage jobs, limited education, limited literacy skills, lack of access to quality and affordable health care, and face marginalization and systemic oppression and discrimination. We appreciate we have been given an opportunity to provide feedback on the Regional Fair Housing Plan

Overall the regional fair housing plan acknowledged that Black and Brown communities have the hardest time accessing affordable housing and have the most housing issues compared to their counterparts. While the plan outlined many different strategies to provide additional affordable housing and rights to residents, most notable of which include 1) Building rental units for people making less than 50% of the AMI, 2) establishing a loan fund to help tenants and nonprofits buy apartments and manufactured home parks for sale, 3) Expanding local funding for housing vouchers, and 4) Establishing a pilot Right to Counsel Program so that tenants can get free legal representation in cases against landlords.

Some areas where this plan could improve is recognizing that the groups that the plan acknowledged are having the hardest time accessing affordable, fair housing (Black and Hispanic communities) are more likely to be making 0-40% of AMI. So you should be focusing a large portion of its resources on creating more affordable housing options for these extremely low-income and working class folks. For example, in your goal #1, you could make a larger effort to build more affordable housing for people making less than 40% of the AMI (instead of below 60% AMI), as these are the families in most need of affordable units, and these are the families that are more likely to be cost burdened and at risk of eviction. Additionally, when expanding local housing vouchers, it is important to make sure these housing vouchers are accessible to undocumented and immigrant communities; this was not noted in the plan and is very important, especially since you acknowledged the growing immigrant community in the region.

The plan recognized that rent is increasing drastically, especially for Black and Brown communities during the pandemic, however you did not acknowledge rent stabilization as a way to curb the increase in rents in the region. We recognize the state has not allowed the localities this power yet, but we think it is still important for the region to acknowledge this method of mitigating rent increases for communities and become united to push for this policy.

Individual Localities

Alexandria City

We understand that the City has the following goals, based on this plan:

1. City is in the process of hiring a language access coordinator to improve its communication with households having limited English proficiency
2. Increase the Supply of housing that is affordable to low-and moderate income families
 - a. Prioritize public land for affordable housing
 - b. Provide tax abatements for homeowners who rent accessory dwelling units to low-and moderate-income tenants
3. Reform zoning and land use policies to expand access to fair housing choice by increasing the development, geographic distribution, and supply of affordable housing
 - a. Adopt mandatory inclusionary zoning citywide
 - b. Permit duplexes in R-20 zone

There is a mention of [voluntary rent guidelines](#) that the city has, where they recommend that landlords increase rent by no more than 5% year-over-year, but they acknowledge that they have no real power to enforce this. **The city could go a step further and recognize that merely a recommendation does not do anything to curb severe rent increases for tenants. The city could explicitly state the importance of and their support of mandatory rent stabilization.**

Although the City has their mandatory inclusionary zoning goal that would mandate that in most new apartments built, a specific percentage of the new units have to be made affordable. This is a good policy, but **the City needs to ensure the units should be at 40% or less AMI.** Other strategies the city can use in order to fulfill their goals are:

1. The city should establish a **local fund voucher program that will allow units to be at the 40% of AMI for the diverse residents that live across the city, regardless of immigration status.** The city needs to be more proactive in having innovative tools to ensure the preservation of the existing working class families living in the City.
2. Another tool the City of Alexandria should also use in order to create affordability and sustainability are **supporting in creating Community land trusts and housing co-ops** which are alternative forms of homeownership
3. We emphasize that none of the goals will be achieved, unless **the City secures funding and should be a priority.**

Prince William County

We understand that the County has the following goals, based on this plan:

1. Increase the Supply of housing that is affordable to low-and moderate income families by establishing a housing trust fund to subsidize the development of affordable housing
2. Reform zoning and land use policies to expand access to fair housing choice by increasing the development, geographic distribution, and supply of affordable housing
 - a. Implement voluntary inclusionary zoning that would incentivize the development of affordable housing in exchange for greater density
 - b. Upzone the Rural Crescent area
 - c. Permit as-of-right duplexes and ADUs throughout county

We believe the County should also:

1. Make a goal for inclusionary zoning to be mandatory, similar to Alexandria City's goal. And use density as an equitable tool for the increase in housing low income working class families of color.
2. Create a housing trust fund and continuously invest in it, in order to prioritize housing for families earning 40% of the AMI and below
3. They should also ensure that they are prioritizing subsidizing housing development affordable for the lowest incomes, 40% of the AMI and below and allow those residents, regardless of immigration status, to have the access into these affordable housing units.
4. Lastly, Prince William County should create a property maintenance report system that will allow tenants from the County to report out any concerns. This will give the County the opportunity to investigate landlords who may be violating state codes, such as the Virginia Landlord Tenant Act

Fairfax

We understand that Fairfax County has the following goals, based on this plan:

1. Increase the Supply of housing that is affordable to low-and moderate income families
 - a. Revise the county's for-sale workforce development housing (WDU) policy by lowering the current AMI categories and/or percentages applicable to the program to facilitate more homeownership opportunities, and consider creating a separate policy for WDUs in high-rise condominiums outside of Tysons.
2. Protect the housing rights of individuals with protected characteristics.
 - a. Adopt tiered payment standards that are aligned to market rents to increase access to higher opportunity areas for voucher users.

Although Fairfax County's goal #2 is a provision for the housing voucher program so that voucher holders are able to find voucher-eligible housing in higher opportunity areas. But again, the county should be equitable and make sure people are able to receive a local voucher regardless of immigration status.

We also want to emphasize that Fairfax County should continue increasing funds for deeply affordable housing in order to preserve the existing housing and create new affordable housing.

As a community organization, and on behalf of our community members, we appreciate being given the opportunity to provide feedback on this plan. We acknowledge the plan is enormous, yet very complex. Which is why we emphasize to you on sharing your internal process and plan for creating and publishing clear, measurable, and specific objectives. What are the results you aim to achieve? How will you measure progress toward those results? How will you analyze progress and evolve your plan as needed, and how will you carry out modifications to the plan? How will you hold yourselves accountable? What is your timeline? How will your plan impact those at the lowest income levels of 40% area median income (AMI) and below? We hope you take our feedback and our questions into consideration as you continue working on the outcomes of this plan to ensure the needs of our working class families of color when it comes to accessibility and affordability of housing.

We look forward to hearing from you.

Sincerely,

Tenants and Workers United



March 31, 2023

**Comments on Metropolitan Washington Regional Fair Housing Plan
Executive Summary**

North Ridge Citizens' Association (NRCA) represents the interests of 2,300 households in the North Ridge area of Alexandria. NRCA recognizes the need for appropriate and affordable housing in this region, specifically for people who work in Alexandria. While we appreciate the good intentions of people and organizations that have produced the draft Executive Summary of the Regional Fair Housing Plan of January 31, 2023, we have many concerns about this document.

The "regionally-focused organizations which work with residents directly impacted by fair housing choice" that were consulted in producing the document represent a narrow perspective in support of building more affordable housing. These organizations are a small subsection of the community and they do not even adequately speak for general business interests other than the real estate and building industries. The views of Alexandria's wider resident community have not been adequately included. The draft executive summary specifically excludes the perspectives of those who do not agree with its preordained ITS policies and proposals, specifically of residents of single-family neighborhoods and Alexandria civic associations.

The process by which the recommended policies have been developed is fundamentally flawed. The draft is an advocacy document, not a policy study. Terms such as 'diversity', 'equity', 'affordability' and 'fair housing' are used but not defined. It is impossible for a reader of this summary to understand what these terms would mean in application. Furthermore, implementation tactics are labeled as "goals." There is no discussion of the real-world consequences of these "goals." There are numerous assertions and stated hopes in the summary but nowhere is there documentation showing that the proposals will achieve their stated goals or what the outcome has been in jurisdictions in which similar policies have been attempted. There is also no presentation or discussion in this document describing what would constitute success and what milestones would constitute progress toward such benchmarks. There is no presentation of how the policies can or will be modified if necessary.

In addressing housing, the draft does not acknowledge that there are competing goals. Advances toward one goal can cause other goals such as improved education in the classroom, provision of adequate infrastructure, greater environmental quality, more green space and an expanded tree canopy, to be more difficult to achieve. A high quality of life and opportunity has drawn residents to Alexandria. This document does not adequately consider what attributes contribute to the unique nature of Alexandria,

what could/should be done to preserve those characteristics for current and future residents, and how greater density will adversely impact quality of life for Alexandrians.

The regional recommendations presented in the executive summary are a blunt instrument. We support regional cooperation and brainstorming, but each jurisdiction is different and needs to develop, with full public input, its own policies tailored to its unique character and population.

In April 2020, NRCA adopted the following position on Alexandria's newly-announced Zoning Initiatives for Housing:

- Zoning changes must take into account all applicable comprehensive area plans for all areas under consideration.
- There must be demonstrated need for all zoning changes.
- Any zoning changes must be consistent with surrounding uses.
- Zoning changes must be consistent with the orderly development of public services, such as transit.

We support incremental steps to move in the direction of a shared long-term vision for Alexandria. We support objective evaluation at each step to inform the next, with course corrections as needed when conditions change (e.g. the decision of Amazon to slow or stop its development plans). We note that the "goals" for Alexandria that are presented in the Draft Executive Summary were not developed with resident input. Further, the report ignores that co-location of housing of any type at existing school sites is illegal in Virginia, as well as posing safety concerns. And great care is called for so that irrevocable actions such as using any public land for housing are not taken without full consideration of unintended consequences.

Finally, we disagree that the proposed policies will remedy discriminatory policies that ended half a century ago. We infer from the document that equality of outcomes rather than equality of opportunity is the desired end. The proposals are predicated on the assumption that the creation of wealth and well-being is a zero-sum game. We fundamentally disagree. We are committed to improving the lives of all current and future residents of this region and our City.

Alexandria's challenges can best be met by evolutionary and not revolutionary policy; by initiatives that are carefully defined, with measurable outcomes, and that allow for continuous improvement. Many of the outlined proposals cannot be undone if later they are determined to be detrimental or harmful.

Alexandria is a welcoming city to all people, including displaced and disadvantaged people from all over the world. It has a diverse population. It has diverse neighborhoods and housing. It is committed to housing affordability and is on track to

meet its own housing goals and the additional goals of MWCOC. We oppose the rush to decision and implementation and "leap before you look" approach proposed in the draft Executive Summary.



26 March 2023

Crises demand bold action. The solutions recommended in this Draft should go further to relieve the housing burden face by residents of the region. All jurisdictions should:

1. Increase the supply of homes at all levels of affordability to dampen housing cost growth for everyone;
2. Encourage construction of deeply affordable homes through financial and regulatory incentives for homebuilders; and
3. Rewrite or strike zoning regulations that make housing of all kinds illegal or cost prohibitive. Legalize multifamily buildings on all residential land, reduce or eliminate parking and lot size mandates that increase housing costs, examine the impact of FAR limits on home costs, etc.

Alexandria should go far beyond its own local recommendations to also strengthen eviction protections and tenant rights, eliminate all minimum lot sizes above 2,500 square feet, legalize multifamily homes citywide, and support conversion of existing single-family homes into co-living or multifamily homes.

YIMBYS of Northern Virginia

Comments on COG Regional Housing Plan:
Regional Sections and Alexandria-specific Section

1. In general, the very nature of those organizations and persons who compiled the study shows that the study was less an objective analysis, and more an advocacy piece. MWCOCG ought to be ashamed of spending tax dollars on a non-objective study. This isn't meant to say that the subject was not worthy of study, but rather that the study's credibility, accuracy, and integrity are brought into question when those hired to conduct the study are clearly advocates of a particular socio-political viewpoint.
2. In particular, by not having broader and more objective input from, say, academics, economists, and real estate consultants, the study fails to understand or acknowledge the basic market forces which determine the price of housing in a strong regional economy. Instead, the study goes looking for "boogeymen" in zoning codes and historic, biased practices assumed to still be alive, and blame those for the high price of housing. While it is sadly true that there was a history of racial and other biased practices in our regional housing, to now point to single-family zoning as evidence that those practices continue fails to look at the diversity of those who are homeowners in SF neighborhoods. My SF neighborhood in Alexandria is an international conglomerate of diverse ownership. SF neighborhoods I know of in Fairfax Co. Arlington, DC, Prince George's Co., et al, are either heavily mixed in terms of racial/ethnic/national origin, or are minority-majority neighborhoods. The zoning is not keeping people of all backgrounds from acquiring homeownership – it is the law of supply and demand that is doing so, and squeezing more homes onto the (generally) small lots of these SF neighborhoods will not lower the cost of that new housing, it will only lower the resale value of the homes adjacent.
3. The saddest part of the regional study is that it really doesn't point the region to approaches which are proven elsewhere to provide affordable housing for those whose incomes are in the range where housing options are few. Historically, lower income families have ended up living in the housing which had been allowed to deteriorate over decades, whether those were owned or rented. In the previous century, we saw the failures of the clearing of the slums/ghettoes (both of which were sadly prejudicial) and replacement with public housing which too quickly became the worst quality housing stock in those cities. There are not a lot of good examples of how local governments have been able to create and support affordable housing. And this study doesn't really try to look to those options. Mostly, the study suggests that MORE housing will somehow lower the cost of the housing. That is wishful thinking, and while New Urbanists typically

believe that, they have little or no evidence to point to in the US or elsewhere that supports that rationale.

4. For the Alexandria portion of the study, not only do all the above comments also apply, but there are additional things which the City seriously needs to take into account before it jumps on the bandwagon of its Zoning for Housing kick. These would include:
 - a. The City needs to put the brakes on Zoning for Housing until the community (all portions of our diverse City) agree on what the Vision Plan 2049 looks like. Zoning for Housing assumes that continuing to grow the population of the City, with its limited area, open space, tree canopy, and other resources, is a given and even desired. I strongly disagree. We may well be wiser to stop our population growth, as it is clearly having negative impact on our quality of life. Let the City's residents and elected officials come to a meeting of the minds on what our City should be like in ~ 25 years, and then see if continuing with Zoning for Housing makes any sense. Right now, the cart is before the horse.
 - b. In terms of any potential increases in housing stock, and the type of that stock, the City seriously needs to do a multi-dimensional impact study. We, the people, need to see an honest and fair appraisal of what the impacts would be of any of the contemplated changes in zoning on:
 - i. School-age children population, and the cost of their education
 - ii. Tree canopy lost to additional development
 - iii. Increase in non-permeable surfaces
 - iv. Water quality and capacity of water and sewer systems
 - v. Stormwater runoff and flooding events, especially related to increasing rate of climate change
 - vi. Greenhouse gas emissions
 - vii. Transportation infrastructure
 - viii. Police, fire, and EMT response times
 - ix. the capacity of the electric grid and our telecommunications and broadband systems
 - x. housing prices (show us the logic behind the implied argument that housing costs will come down under greater growth)
 - xi. property taxes
 - xii. open space.
 - c. Before continuing to spend our taxes on Zoning for Housing, the City needs to consult with independent counsel to see whether the various changes in zoning will meet the test of constitutionality under the Virginia Constitution or the US Constitution. It is not hard to argue (as a lay person) that eliminating SF zoning is an unconstitutional take of the value

of the homes next to where the additional units will be squeezed into a small lot. If independent counsel (not someone who has a socio-political axe to grind or a job to protect) suggests there is validity to that argument, then the City can focus on other aspects of how to help achieve the target of having housing that is more affordable.

- d. What is most seriously missing from this whole City approach is that it focuses on building new/more housing, and not on preserving and protecting the affordable (market affordable or 'true' affordable) housing that we have. In the Alexandria West area, most of the housing is rental – apartments and townhouses and even SF detached houses – and a LOT of that is market affordable. The current owners of huge tracts of such housing (e.g., Southern Towers, and the former Hamlets of the former Winkler properties) are likely salivating over the idea of destroying such market affordable housing and building something with a stronger revenue stream and rate of return. Those two alone likely constitute 2500 – 3000 (or more) affordable apartments. What in this Zoning for Housing effort is targeted towards preserving these units and helping their hard-working tenants keep a decent place to live? I see nothing in the City's plans. Yes, we all understand how a Virginia city's ability to do creative things with public policy are constrained by the Dillon Rule in our Commonwealth's Constitution. But that is no reason to ignore the serious damage the loss of such housing would represent to our City. Frankly, the number one thing the City needs to be doing is finding examples of creative and effective municipal government actions from the US or elsewhere that have helped preserve affordable housing, and tailor them to our City's needs, and then beg/borrow/plead for permission (if it is needed) from the General Assembly to be able to put those ideas into action.

Submitted March 31, 2023 by:

Owen P. Curtis
5465 Fillmore Ave.
Alexandria, VA 22311

March 31, 2023

Comments on (1) Metropolitan Washington Regional Fair Housing Plan - Draft Executive Summary, (2) Community Engagement Summary, and (3) Draft Metropolitan Washington Regional Fair Housing Plan–City of Alexandria

There are many problems in all three documents, too numerous to address in the limited time allowed. Nonetheless, I have the following initial comments. For convenience, the quoted portions from each document are set forth in bold, and are followed by my comments not in bold.

1. Draft Executive Summary:

Prepared by the Lawyers’ Committee for Civil Rights Under Law, the Urban Institute, and Ochoa Urban Collaborative in partnership with COG member governments

- Fundamentally biased authorship group that failed to accurately describe the full history of Alexandria through the present, mischaracterized the relevance, if any, of alleged barriers, made erroneous assumptions, etc.
- Authors appear to be agenda-driven and predisposed in favor of eliminating single-family zoned (“SFZ”) neighborhoods, without bothering to ask citizens that would be negatively impacted for their opinions or concerns.

COMMUNITY ADVISORY COMMITTEE - Regionally-focused organizations which work with residents directly impacted by fair housing choice provided guidance to the local governments. The organizations included: Action in the Community Through Service (ACTS); CASA; Catholic Charities Archdiocese of Washington and Catholic Charities of Arlington; ENdependence Center of Northern Virginia; Equal Rights Center; Friendship Place; Greater Washington Urban League; House of Ruth; Legal Services of Northern Virginia; NAACP Chapters of Arlington County, Fairfax County, Montgomery County, and Prince William County; Offender Aid Restoration; Pathways Homes; and Washington Legal Clinic for the Homeless.

- Biased input, which was limited to the views of special interest groups self-interested in the outcome of the study, rather than asking the right questions and providing correct answers.
- No representation by, or input from, Alexandria citizens’ associations, representatives of SFZ neighborhoods, or private sector businesses outside the real estate and building industries.
 - Virginia law requires the City of Alexandria to adopt a “comprehensive plan” for the “purpose of guiding and accomplishing a coordinated, adjusted and harmonious development” of the City (VA Code Section 15.2-2-223 (A)).
 - Historically, as referenced in the City Zoning Code, the City has looked to its civic associations as a principal resource for ensuring public notice, as well as feedback pursuant to approvals for special uses. For example, Section 11-513 (A)(2) (“Administrative Special Use Permit”) mandates that “notice of a pending administrative permit application shall be made in a newspaper of general circulation in the city, posted on the subject property, given to nearby civic and

business associations by email, by eNews or equivalent electronic notice, and prominently posted on the department web page in a list of pending administrative applications for review by the public.”

- Further, Section 11-513, Article XI (“Administrative Special Use Permit – Development Approvals and Procedures”) notes that “Any person or civic or business association affected by a decision of the director issued pursuant to Section 11-513 (A)(5) may appeal the decision to the Planning Commission, by filing a notice of appeal, in writing, stating the grounds on which the person is affected and the ground of appeal...”
- The City’s established requirements related to zoning matters and civic associations are tested, tried, and true. Some civic associations in Alexandria have incorporated this legally recognized authority within their organizational Bylaws. Therefore, Alexandria’s civic associations may be significantly and adversely impacted by any potential changes to existing requirements, or any attempts to amend aspects of the current process as it pertains to established governance structures (e.g., Master Plan, Small Area Plans, etc.).
- COG’s utter failure to consult with citizens’ associations is another reason why the results of its study and report are skewed, biased, and fatally deficient.
- The Committee appears to be a who’s-who list of organizations with vested self-interests that reflect the views of a narrow section of citizens, neighborhoods, and housing types.
- The effect was to avoid a diversity of opinions and perspectives.

Fair housing challenges

People choose to live in this region for many reasons – healthy neighborhoods, good schools, and access to jobs, to name a few. But many aren’t treated equally when it comes to housing and other opportunities. This is especially true for residents of color, those with low incomes, and people with disabilities.

- Study fundamentally and mistakenly equates equal treatment and equal opportunity under the law with equal results
- Study fundamentally and mistakenly equates different economic and social outcomes with unequal treatment under the law and unequal opportunity
- The study is in part an advocacy piece, not an objective study
- People of all races have chosen to live in SFZ neighborhoods, and have paid extra for that. Taking that away from them without compensation is an illegal “taking” and a stab in the back

Areas with higher numbers of residents who are Black, Indigenous and People of Color (BIPOC) often have higher poverty rates and less access to good schools, healthy neighborhoods, transportation, and job opportunities.

- Alexandria students are already being bused around the City in patterns directed by ACPS

- The report claims that BIPOC are denied access to “good” schools, but misses the point that the report shows that all students in Alexandria are denied access to “good” public schools. And, SFZ neighborhoods are not responsible. The City and ACPS are responsible.
- Increased density leads to less healthy neighborhoods, more congestion, more parking stress, noise complaints, less green space, etc.

Many local governments in our region have taken major steps to improve access to safe and affordable housing. They’ve: ...

• Made zoning changes

- Minneapolis is an example of what doesn’t work
- Density does not improve safety of a neighborhood
- Affordable housing is best near reliable, frequent public transit, shopping, etc.

At the same time, however, the region continues to attract investment in new commercial development that fuels displacement concerns due to increases in local housing prices and rents.

- A solution is to limit new commercial development in what is already the most densely populated jurisdiction in the entire Commonwealth

Additionally, the high cost to acquire land for development and build in the metropolitan Washington region means that most new housing produced is unaffordable for many residents.

- Trying to cram more people into what is already the most densely populated jurisdiction in the entire Commonwealth is a problem imposed by the City
- The City’s “pack’em and stack’em” approach is the problem
- Cutting real estate tax rates across the board in Alexandria would reduce unaffordability

These market forces are often compounded by community pushback, or a Not in My Backyard (NIMBY) sentiment from residents in response to attempts to develop more affordable housing or allow for increased density, all of which presents a challenge for the region.

- The referenced “residents” are mythical.
- If it is a regional issue, why are so few COG members participating in this process?
- Who is driving Alexandria’s role? Elected officials wanting to hone their progressive bona fides? Developers? Speculators? Other monied interests? Progressive zealots? Narrowly focused special interest groups? Out of town special interest groups and developers? Or all of the above?
- Objecting to increased density is a reasonable and sensible position to take, especially considering that Alexandria is already the most densely populated jurisdiction in the entire Commonwealth.
- Opposing the City’s war on SFZ is a reasonable and sensible position, especially considering that Alexandria is already the most densely populated jurisdiction in the entire Commonwealth.
- Residents’ legitimate concerns are not a “problem” and an “opposition” that needs to be dismantled.” COG’s language is offensive and should be stricken.

- Preserving and enhancing Alexandria’s mature tree canopy and other green spaces are a reasonable and sensible goal and position to take, especially considering that Alexandria is already the most densely populated jurisdiction in the entire Commonwealth.
- What are the current impediments to living in a neighborhood? Not race. Not color of skin.
- There is equal opportunity. Race-based restrictive covenants were relatively rare in the City, and have been unenforceable as a matter of law for many, many years. They have been for many, many years irrelevant to who can now move into a neighborhood. And any redlining ended nearly a half century ago, and well before most residents in SFZ areas purchased their home.
- Even if there were instances where SFZ might have had the effect of making a neighborhood more of one race than another a half century or more ago, those who then moved into those neighborhoods are very likely dead or long gone. In contrast, subsequent and current residents have paid a premium price, and have been paying disproportionately higher taxes, for the benefit of living in a SFZ neighborhood. To now deny them those benefits would be a betrayal of public trust, illegal, and an unconscionable taking without full and fair compensation.
- Aim appears to be to *harm/reduce* SFZ housing values to make some houses cheaper for developers and newcomers.
- Aim appears to be redistribution of wealth to achieve equal results, not equal opportunity, masquerading as an affordable housing policy.

Segregation

Segregation is on the rise in our region. The “Dissimilarity Index” measures segregation in housing. In other words, it shows how unevenly distributed two different groups are within a city or metropolitan area. The higher the index, the more separate the two groups are...

The “Isolation Index” measures how much those in a certain group live close only to others in the same group [] ...

The “Exposure Index” measures how much people live in communities with people from different racial and ethnic groups.[] When we measure residential segregation in our region, this index gives the same results as the Dissimilarity and Isolation indices. For example, White residents have relatively low exposure rates compared to all minority groups. This means they’re less likely to live in communities with people of different races or ethnicities.

- Segregation is not on the rise in SFZ neighborhoods in Alexandria.
- Unless unconstitutional quotas / mandates that each neighborhood have the same proportions of every race or ethnic group were enforced, then of course some group of residents would be less likely to live in communities with other races or ethnic groups, especially where some races or ethnic groups (such as from El Salvador) have voluntarily chosen to live in areas where other members of the same race or group already live.

Where one lives has a major effect on mental and physical health, education, exposure to crime and economic opportunity.

- If that were the case, then reigning in densification and urbanization would help reduce negative effects on mental and physical health, education, exposure to crime and economic opportunity.
- The report has cause and effect reversed. For example, at a recent (March 21, 2023) City summit on housing, a reasonable question was posed to the City panel (specifically Karl Moritz) asking specifically how moving an individual from a less affluent area to a SFZ neighborhood would be “determinative” (Mr. Moritz’s words) of that person’s life expectancy, health, and economic opportunity. The question was ignored and not answered. The answer is that it would not be determinative.

Residents who live in urban areas that are more segregated by race and income have fewer chances to move up economically.

- This conclusion is unsupported.
- People of all races are moving into SFZ neighborhoods for the obvious reason that they want to live in SFZ neighborhoods—such neighborhoods are desirable.

Many research studies have found that racial inequality is made worse by residential segregation.

- There is no known credible study demonstrating that in Alexandria.
- There is no known credible study demonstrating that eliminating SFZ will achieve greater equal opportunity in Alexandria.
- The summary misconstrues and misuses housing “segregation.” With regard to residential housing, Merriam-Webster Dictionary defines segregation as “the separation or isolation of a race, class, or ethnic group by **enforced or voluntary residence in a restricted area...**”
- In Alexandria, there is no enforced segregation, and it is spurious to claim otherwise. Redlining ended nearly a half century ago, and well before most residents in SFZ areas purchased their home.

Higher poverty rates in an area may also lead to higher crime rates and worse health outcomes.

- Increasing urbanization is the problem created by City officials and their supporters.

Opportunities

Schools

Access to good schools also depends on where you live in our region: ...

– Low performing schools are more likely to be in urban areas with larger numbers of Black and Hispanic residents. They include the District of Columbia and urban areas in Alexandria and Arlington.

- Solution is to improve schools in Alexandria, not eliminate SFZ.

Healthy environments (areas with less pollution)

• The more suburban and rural areas of Loudoun and Prince William counties are the healthiest places to live in the region....

- This supports a finding that SFZ neighborhoods are healthier and contradicts most of the assumptions and conclusions in the report.

- **The District, Arlington and Alexandria have the lowest access.**
 - Increasing density and congestion in Alexandria will negatively affect health and quality of life.
- **Access to healthy environments has improved dramatically for all residents since 2019. The reason is likely less pollution from the drop in commuters during the COVID-19 pandemic.**
 - Ignores other likely factors, such as less time spent in denser, more urbanized areas such as downtown DC and other congested, dense area such as Rosslyn and Crystal City.
 - Increasing density in SFZ neighborhoods, particularly those without frequent, reliable mass transit, jobs, shopping, etc. will increase pollution in those areas

...

Access to Opportunities by Race and Ethnicity

Groups with the most access are listed first after each opportunity. Those with the least access are listed last.

Schools: White, Asian, Native American, Hispanic, Black.

- Solution is to improve public schools in Alexandria, not eliminate SFZ.

...

Access to jobs: Asian, White, Hispanic, Native American, Black.

- Affordable housing should be located near frequent and reliable mass transit, jobs for their residents, and shopping.

Transit index: (how frequent and friendly, distance between stops, connections): Hispanic, Asian, Black, Native American, White.

- Affordable housing should be located near frequent and reliable mass transit, jobs for their residents, and shopping.

...

Environment (pollution level): White, Native American, Asian, Hispanic, Black.

- This supports a finding that SFZ neighborhoods are healthier and contradicts most of the assumptions and conclusions in the report.

Housing

Common problems

Of the region's more than two million households, one-third have one or more of these HUD-designated housing problems:

- 1. Incomplete kitchen facilities**
- 2. Incomplete plumbing facilities**
- 3. Overcrowding**
- 4. High cost (paying 30% or more of income on housing costs).**

- Eliminating SFZ will not solve these perceived problems
- Increasing density will not solve these perceived problems, but will increase problems

Households of color -- and particularly Hispanic and Black households, are more likely to have housing problems. This is also true for nonfamily households (people living together who are not related) and families of five or more. See Table 1c for more information. Regionally, 25% of White households and one of every three households of color have housing problems.

This trend continues for households facing severe housing problems. See Table 1c. The problems include no kitchen or plumbing. More than one person per room or housing costs of 50% or more of the household's income also are considered severe problems.

- Cramming more people into SFZ areas will not appreciably solve these perceived problems, but will increase such problems in SFZ neighborhoods
- The City's "pack'em and stack'em" mentality will create a less desirable City overall

...

• Renters in Alexandria, Arlington, and Loudoun Counties are least likely to experience severe housing problems

- This contradicts the assumptions and rationales for eliminating SFZ and massively changing zoning laws in Alexandria

The goals and strategies

1. Increase the supply of affordable housing for families earning at or below 60% of the Area Median Income (AMI) for the region – especially where there hasn't been any.

- It is a national issue
- Alexandria is doing far better in this regard than neighboring jurisdictions, as the report shows

There are several ways to achieve this goal:

...

• Provide low-interest loans to homeowners who want to build affordable ADUs (Accessible Dwelling Units) on their property. (Example: an apartment over a garage).

- Short-term rentals, incredibly small (3-foot) setbacks, and lack of prior notice to neighbors of ADUs have and will increasingly lead to disputes, noise, and other negative attributes of density

2. Change zoning and land use policies to expand access to fair housing. Increase the development, geographic distribution, and supply of affordable housing.

Zoning for single-family homes in the region makes it hard to develop affordable housing. To change this, local leaders can:

• Revise zoning regulations to allow as-of-right Accessory Dwelling Units

- Short-term rentals, incredibly small (3-foot) setbacks, and lack of prior notice to neighbors of ADUs have and will increasingly lead to disputes, noise, parking problems, and other negative attributes of density

• Increase inclusionary zoning incentives for more affordable housing units to be created in a new mixed income building or increase fees for developers to pay for someone else to build affordable housing in a different location sometime in the future

- So-called non-profits and their for-profit partners / backers already are making a lot of money from the City’s generous housing and land use programs.

• **Adopt zoning changes to make it easier to develop affordable housing**

- Wouldn’t such changes involve illegal quotas for neighborhoods?
- Eliminating SFZ will not make it easier to develop housing in any significant number; instead, eliminating SFZ neighborhoods will reduce the diversity of types of neighborhoods available in the City.
- Affordable housing should be located near frequent and reliable mass transit, jobs for their residents, and shopping.

• **Include a fair housing equity analysis when reviewing significant rezoning proposals and specific plans**

- The City would first need to perform an analysis of the equities for current owners and residents in the impacted neighborhoods before embarking on these massive zoning changes.

3. Implement policies to preserve affordable housing and prevent displacement of residents. Keep the same number of existing affordable rental units in our region.

We’ve lost affordable housing during the past decade.

- Not true for Alexandria

One of our priorities must be to have a net zero change. In other words, we need to offset the loss by building new or preserving existing units. To do this, we must:

• **Track and support existing affordable housing**

- Already the case in Alexandria

...

Increase the number of homeowners in the region and reduce the unequal treatment and discriminatory practices that keep members of protected classes from buying a home.

- Already the case in Alexandria

We can increase opportunities for low- and moderate-income buyers to buy homes:

• **Through cooperative homeownership models and community land trusts**

• **By allowing and encouraging higher density, smaller/accessory dwelling units and duplexes**

- Short-term rentals, incredibly small (3-foot) setbacks, and lack of prior notice to neighbors of ADUs have and will increasingly lead to disputes, noise, and other negative attributes of density.
- Increasing density in SFZ will lead to crowding, increased traffic and parking problems, noise, loss of mature tree canopy and green space, etc.

BOX 6

Fair Housing Goals and Strategies

...

City of Alexandria

Prioritize public land for affordable housing.

- Co-location of housing of any type at school sites is illegal in Virginia, as well as posing serious safety concerns.

Provide partial tax abatements for homeowners who rent their ADUs to low-and moderate-income tenants.

- Short-term rentals, incredibly small (3-foot) setbacks, and lack of prior notice to neighbors of ADUs have and will increasingly lead to disputes, noise, and other negative attributes of density.

In accordance with Virginia Code § 15.2-2304. Affordable dwelling unit ordinances in certain localities, adopt an ordinance to institute mandatory inclusionary zoning city-wide and provide an array of incentives, such as density bonuses, special financing, expedited approval, fee waivers, and tax incentives.

- The cited code section does not authorize mandatory inclusionary zoning city-wide or incentives, such as special financing, expedited approval, fee waivers, and tax incentives.

Reduce the 20,000 square foot minimum lot size in the R-20 zone or permit duplexes in this zone.

- Allowing duplexes in any SFZ will lead to crowding, increased traffic and parking problems, noise, loss of mature tree canopy and green space, etc.

* * *

2. Community Engagement Summary

The summary shows that COG engaged special interest groups and officials, many from outside the City, but not Alexandria citizens' associations or any representatives of SFZ neighborhoods, negating the usefulness of that engagement and skewing the results.

The report claimed that Alexandria's City Council held a public hearing to take input on the COG report on April 17, 2021. I know of no public discussion by Council on that date relating to the COG report.

* * *

3. Draft Metropolitan Washington Regional Fair Housing Plan—City of Alexandria

The project team took seriously its role in ensuring that community voices inform the plan. These voices are important to help confirm data findings, identify gaps in information, or reshape biases or uninformed viewpoints. (p. 5)

- This statement is incorrect. The outreach was biased, focused on the views of special interest groups self-interested in the outcome of the study, rather than asking the right questions and providing correct answers.
- No representation by, or input from, Alexandria citizens' associations, representatives of SFZ neighborhoods, etc., who most likely would be negatively affected by the proposals/goals.

To that end, the project team wanted to engage with residents from across the region to share barriers to affordable housing and talk about equity and discrimination in housing. The project team partnered with Challenging Racism, a nonprofit organization headquartered in Arlington, Virginia, with a mission to “educate people about the prevalence and inequities of institutional and systemic racism, giving them knowledge and tools they need to challenge racism where they encounter it.” (p. 7)

- This statement is incorrect. The outreach was biased, limited to the views of special interest groups self-interested in the outcome of the study, rather than asking the right questions and providing correct answers.
- No representation by, or input from, Alexandria citizens’ associations, representatives of SFZ neighborhoods, etc.

• **Safe, affordable housing in acceptable condition is difficult to find, according to 83.6 percent of respondents. The top three reasons given were that the respondent didn’t earn enough money (58.9 percent), ... and the respondent was not able to save for a security deposit or down payment (29.9 percent). Other reasons included that the respondent had too much debt, mortgage interest or fees were too expensive, and the homebuying process was too confusing or complicated. (p. 8)**

- This statement totally contradicts the assumptions and conclusions in the report. It acknowledges that money and personal choice are by far the reasons people can’t live wherever they want, not illegal discrimination, and not single-family zoning.

• **The top three reasons reported for discrimination were income level, race or ethnicity, or source of income. (p. 8)**

- This statement totally contradicts the assumptions and conclusions in the report. It acknowledges that money is by far the reason people can’t live wherever they want, not illegal discrimination, and not single-family zoning.

The NVivo study found the following problems to be the top 10 barriers to fair housing in the region, in rank order: ...

10. planning and zoning regulations (p. 10)

- This finding contradicts the assumptions and conclusions in the report. Money and personal choice are by far the reasons people can’t live wherever they want, not illegal discrimination, and not zoning, which was dead last in the list of 10 “barriers.”

Table 12: Isolation Index Values by Race and Ethnicity (p. 25)

- The table shows that the Isolation Index for Whites and Blacks in Alexandria have dramatically improved (gone down). This finding contradicts the report’s assumptions of significant discrimination, alleged legacy effects of past discrimination, and claimed need for zoning changes.

iii. Disparities in Access to Opportunity

a. Disparities in Access to Opportunity—Education

i. Describe any disparities in access to proficient schools in the jurisdiction and region.

Table 16: School Proficiency Index for Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Statistical Area (p. 50)

- The numbers for Alexandria are substantially worse for Alexandria compared to the Region for all races. The City and ACPS should focus much more on improving schools and education for students already in the system and far less on increasing the population and especially student population.

i. Describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.

Table 17: Labor Market and Jobs Proximity Indexes (p. 59)

- The numbers for Alexandria overall are substantially better compared to the Region for all races. The City and ACPS should focus much more on improving schools and education for students already in the system and far less on increasing the population and especially student population. This finding contradicts the claimed need for zoning changes.

All racial and ethnic groups measured by the Labor Market Index have high levels of employment engagement in Alexandria, ranging from 85 to 94, but there is a slight racial disparity between the groups ... (p. 65)

- Elimination of SFZ neighborhoods would not appreciably improve the already high levels of employment engagement.

When economic status is accounted for, [the Job Proximity figures] vary little for most groups, suggesting that class does not strongly impact job proximity. (p. 65-66)

- Elimination of SFZ neighborhoods very likely would not improve the already high levels of employment engagement.
- Affordable housing should be located near frequent and reliable mass transit, jobs for their residents, and shopping.
- This finding contradicts the assumptions and conclusions in the report. Money and personal choice are by far the reasons people can't live wherever they want, not illegal discrimination, and not zoning, which was dead last in the list of 10 "barriers."

Transportation index values are relatively high in Alexandria, with minimal disparities based on race, ethnicity, or poverty status. (p. 80)

- Elimination of SFZ neighborhoods very likely would not improve the already high levels of transportation index values.
- Affordable housing should be located near frequent and reliable mass transit, jobs for their residents, and shopping.
- This finding contradicts the assumptions and conclusions in the report. Money and personal choice are by far the reasons people can't live wherever they want, not illegal discrimination, and not zoning.

Discrepancies in transit access in Alexandria vary negligibly based on race and ethnicity. (p. 87)

- Elimination of SFZ neighborhoods very likely would not improve the already high levels of transit access.
- Affordable housing should be located near frequent and reliable mass transit, jobs for their residents, and shopping.
- This finding contradicts the assumptions and conclusions in the report. Money and personal choice are by far the reasons people can't live wherever they want, not illegal discrimination, not access to transit, and not zoning.

e. Disparities in Access to Opportunity – Access to Environmentally Healthy Neighborhoods

i. Describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region. ...

Generally, urban areas tend to have lower air quality as these areas have more emission sources and thus more exposure to hazards... Generally, urban areas tend to have lower air quality as these areas have more emission sources and thus more exposure to hazards. (p. 99)

- The Environmental Health Index for Alexandrians is strikingly worse than the region as a whole. This confirms the obvious—the most urbanized and densely populated jurisdiction (Alexandria) has the highest “exposure to toxins.”
- This supports a finding that SFZ and other less densely populated neighborhoods are healthier and contradicts many of the assumptions and conclusions in the report.
- Increasing density and congestion in SFZ neighborhoods will negatively affect health and quality of life.

iv. Disproportionate Housing Needs

1.a. ...

The four HUD-designated housing problems include (1) lacking complete kitchen facilities, (2) lacking complete plumbing facilities, (3) overcrowding, and (4) experiencing housing cost burden. (p. 107)

- Elimination of SFZ neighborhoods would do nothing to address these stated problems.

Overcrowding ...

Alexandria

In Alexandria, Hispanic households have a disproportionate share of households living in overcrowded housing, 9.2 percent. This rate is much higher than the rate of overcrowding for White households, which is 0.7 percent. Black and Asian households also have a disproportionate, though lesser, share of overcrowding than White households do. (p.112)

- This statement ignores the fact that Table 26 shows, for four of the five groups, the percentage of overcrowding in Alexandria is less than for the Region.

B. Alexandria Goals

1. Increase the Supply of Housing That Is Affordable to Low- and Moderate-Income Families through the Following Strategies:

- a. Prioritize public land for affordable housing. (p. 159)**

- Co-location of housing of any type at school sites is illegal in Virginia, as well as posing serious safety concerns.
- The City Office of Housing has denied that City staff or officials submitted this “goal” to COG.
- Accordingly, this “goal” should be stricken from the report.

b. Provide partial tax abatements for homeowners who rent their accessory dwelling units to low- and moderate-income tenants. (p. 159)

- Short-term rentals, incredibly small (3-foot) setbacks, and lack of prior notice to neighbors of ADUs have and will increasingly lead to disputes, noise, and other negative attributes of density.
- This would be unfair to those owners who forgo cramming ADUs into their lot.

2. Reform Zoning and Land Use Policies to Expand Access to Fair Housing Choice by Increasing the Development, Geographic Distribution, and Supply of Affordable Housing.

a. In accordance with Virginia Code § 15.2-2304 on affordable dwelling unit ordinances in certain localities, adopt an ordinance to institute mandatory inclusionary zoning citywide, and provide an array of incentives such as density bonuses, special financing, expedited approval, fee waivers, and tax incentives. (p. 159)

- This purported goal (e.g., “Mandatory inclusionary zoning citywide”) is vague and potentially misleading and overbroad.
- The cited code section does not authorize mandatory inclusionary zoning city-wide or incentives, such as special financing, expedited approval, fee waivers, and tax incentives.
- Short-term rentals, incredibly small (3-foot) setbacks, and lack of prior notice to neighbors of ADUs have and will increasingly lead to disputes, noise, and other negative attributes of density.
- The City’s “pack’em and stack’em” approach is the problem, not the solution.
- The goals would eviscerate Small Area Plans in the City.

b. Reduce the 20,000 square-foot minimum lot size in the R-20 zone, or permit duplexes in this zone. (p. 159)

- Allowing duplexes in any SFZ neighborhood will lead to crowding, increased traffic and parking problems, noise, loss of mature tree canopy and green space, etc.
- The City’s “pack’em and stack’em” approach is the problem, not the solution.
- The goals would eviscerate Small Area Plans in the City.

The City of Alexandria has a large amount of single-family housing.²⁷⁷ The high number of historic areas in the city make it difficult to build multifamily housing.²⁷⁸ As a result, affordable housing is only viable on the edges of the municipality.²⁷⁹ The Alexandria City Council approved accessory dwelling units (ADUs) in 2021.²⁸⁰ (p. 186)

- This statement is incorrect for several reasons.
- The statement that “Alexandria has a large amount of single-family homes” incorrectly cite as its source the City’s ADU webpage, which says nothing about the amount of single family homes.

- In fact, the Census Bureau found that only 15% of Alexandria’s housing units are detached, single-family homes. This is lower than virtually every other locality in the United States—the national level is 63%, and 51% of Alexandria’s overall housing units are found in multi-family buildings of 10 or more apartments, far greater than the national level of 14%.
- Detached single-family housing is the only type of housing that has not increased in Alexandria since 2010.
- And compared to the Region, open space in Alexandria is miniscule. The amount of green space is even less. Densification would only make this worse.
- COG, City government and officials, and monied interests cannot have it both ways. They cannot accurately claim that eliminating SFZ (e.g., cramming in ADUs, conversions to duplexes, etc.) is necessary to appreciably increase the City’s affordable housing stock on the one hand, while knowing that SFZ neighborhoods account for only a very small percentage of City dwelling units.
- Similarly, COG, City government and officials, and monied interests cannot accurately claim that eliminating SFZ (e.g., cramming in ADUs, allowing duplexes, etc.) could appreciably increase the City’s affordable housing stock on the one hand, while claiming that the densification of SFZ neighborhoods would not be significant.
- The City’s “pack’em and stack’em” approach is the problem, not the solution.
- The goals would eviscerate Small Area Plans in the City.
- Overall, Alexandria is already the most densely populated jurisdiction in Virginia. To cram more into the City people would financially benefit monied interests, but it would make our City a less desirable place to live.

Respectfully submitted

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