

## Prepared Statement for Planning Commission Meeting on 1/4/2022 Regarding Docket #6 & #7 for Zoning Text Amendment #2021-00009

Joshua Bowman  
3000 Mosby Street  
Alexandria

Good Evening,

Other speakers will have spoken about the urgent need for more affordable housing in Alexandria, and I believe this is an important project towards that end. However, as a member of St. Rita Parish and neighboring Warwick Village, I do have concerns related to the plans that have been presented. After reviewing the design in detail, I believe more work is needed to adequately address the impacts to water quality, parking, and pedestrian safety.

Regarding water and flooding, the “Storm Sewer Outfall Analysis” mislabels the existing underground stream as a “storm sewer.” The U.S. Geological Survey’s hydrographic dataset classifies this unnamed stream as a natural watercourse which although covered, still follows its original path which is clearly present on historic maps and aerial photographs. This stream has also been “daylighted” as it runs through Monticello Park. (See screen capture below.) Given the frequency of flooding and also the prevalence of runoff and litter in Four Mile Run, this project will have a major impact on local water quality as well as many properties in the area upstream. This plan must ensure that there is adequate review and the opportunity for public input specifically related to stormwater mitigation and environmental impacts.

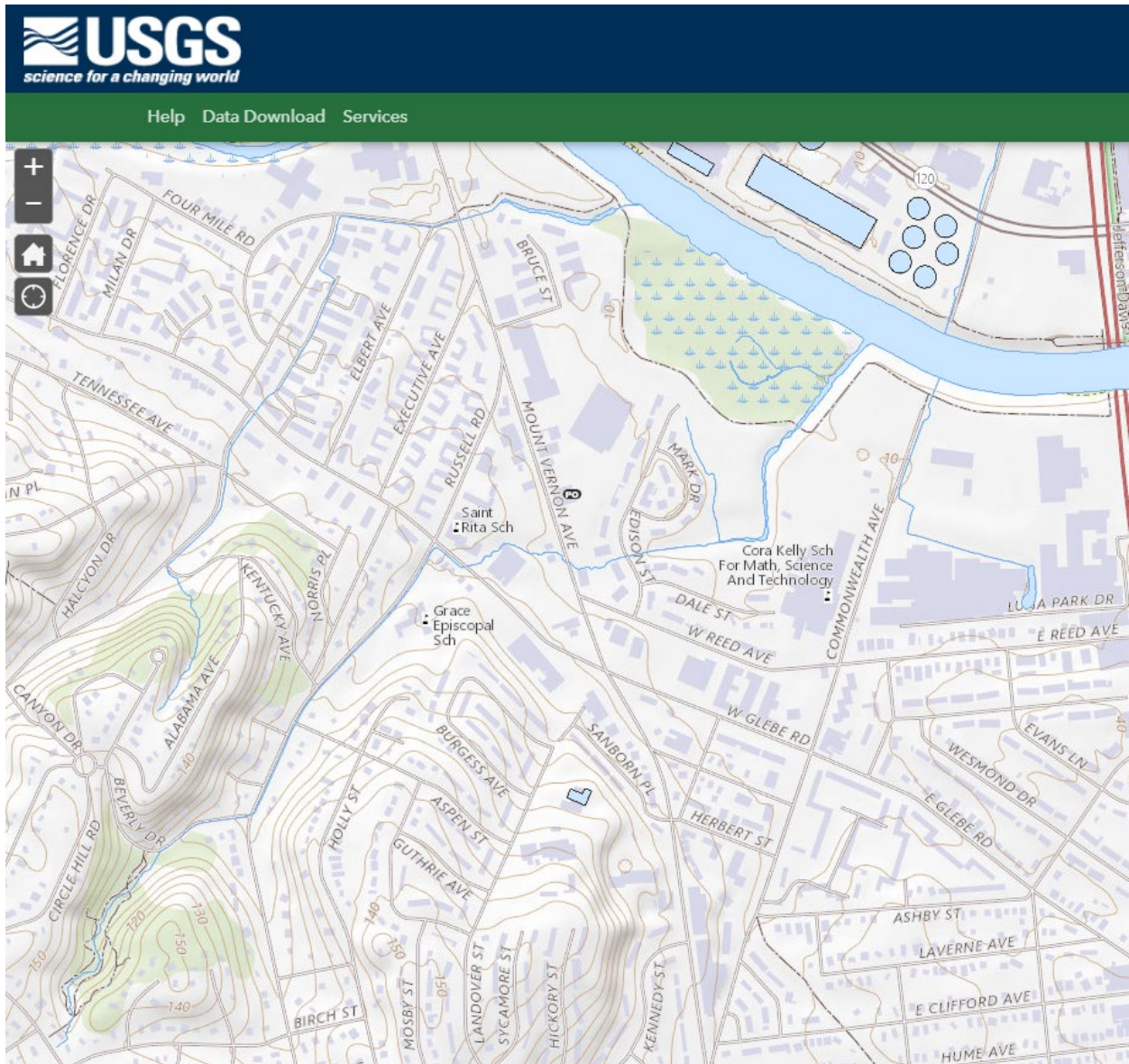
Regarding parking, there are many people in our community who rely on a vehicle for their livelihood. Tradesmen and contractors park their trucks and vans overnight in the public lot on Mt. Vernon Avenue and the M.O.M.’s shopping center across the street because there is inadequate parking available for the residential units that already exist and there is very little on-street parking available. If the proposed development is serious about avoiding displacement of the existing community, the current parking plan with fewer than one parking spot per residential unit will not be sufficient to allow residents who have a vehicle for work and a family car to continue to live in the neighborhood. This may be a citywide policy aimed at reducing automobile use, but in the present instance, it leads to a perverse outcome.

Finally, for those residents of the community who do rely on public transit (which is the stated rationale for reducing the available parking), pedestrian safety is a dire concern which needs immediate action. The recent pedestrian fatality on Glebe Road is not the first such incident, but is one of several that I can remember in recent years. With even more density being built near a major intersection, it will not be the last either unless the plans incorporate major changes to the streetscape, especially on Glebe Road. Children walking to nearby schools and workers walking to nearby bus stops and the Metro place their lives at risk. More than just wider sidewalks, there needs to be an extensive redesign of the entire block

of Glebe Road adjacent to this development.

While this project is an opportunity to improve access to housing and the quality of life for our community, it will fall short of that potential if more is not done to address these impacts.

Thank you.



[EXTERNAL]Planning Comm'n January 4, 2022 Docket Items # 6 & #7-Zoning Text Amendment #2021-00009; City Charter § 9.06 Case #2021-00006; Coordinated Development District Concept Plan #2021-00005; Development SUP #2021-10024; etc.

johnfehrenbach@comcast.net <johnfehrenbach@comcast.net>

Tue 1/4/2022 4:11 PM

To: PlanComm <PlanComm@alexandriava.gov>

Cc: 'Meagan L. Alderton' <meagan.alderon@acps.k12.va.us>; Gregory Hutchings, Jr. <Gregory.Hutchings@acps.k12.va.us>

 1 attachments (2 MB)

NRCA Letter to Planning Commission re Safeway Dev - 01 04 22.pdf;

Please see the attached comments of the North Ridge Citizens' Association re the above-referenced matters.

Best regards,

John Fehrenbach

202-352-5925

President

North Ridge Citizens' Association (NRCA)

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NRCA, P.O. Box 3242, Alexandria, VA 22302

January 4, 2022

Planning Commission  
c/o Department of Planning & Zoning  
P.O. Box 178  
Alexandria, VA 22314  
[PlanComm@alexandriava.govx](mailto:PlanComm@alexandriava.govx)

**Re: January 4, 2022 Docket Items # 6 & #7—Zoning Text Amendment #2021-00009; City Charter § 9.06 Case #2021-00006; Coordinated Development District Concept Plan #2021-00005; Development Special Use Permit #2021-10024; Transportation Management Plan Special Use Permit #2021-00063; Vacation #2021-00001; 221 West Glebe Road; 3606, 3610, 3612 and 3700 Mount Vernon Avenue - AHDC Glebe/Mt. Vernon**

Dear Chairman Macek and Planning Commission Members:

North Ridge Citizens' Association ("NRCA") opposes the massive scale of redevelopment of the Arlandria-Chirilagua section that the above-referenced docket items would allow.

First, as summarized in our letters to the Planning Commission and City Council opposing the Small Area Plan (*copies enclosed*), the substantial increase in the number and density of people that would be added to Arlandria would have detrimental effects that would be unnecessary, significant, and irreversible. Among those would be:

- a) Increased crowding of already overcrowded Alexandria schools;
- b) Increased traffic and congestion as well as cut-through traffic in surrounding neighborhoods including but not limited to North Ridge;
- c) Loss of already inadequate parking to serve residents, shoppers, churchgoers, and restaurant- and venue-goers, and those in nearby areas; and
- d) Radical alteration of the streetscape with building heights that would dwarf existing structures and eradicate the characteristic Art Deco style.

Second, Title 15.2, Article 7, of the Code of Virginia *requires* that all land-use plans of cities in the Commonwealth "protect citizens against one or more of the following: overcrowding of land, undue density of population in relation to the community facilities *existing or available*, obstruction of light and air, danger and congestion in travel and transportation ..." (Code of Virginia, The Comprehensive Plan, § 15.2-2283 (emphasis added)). The project(s) being considered appear to violate every one of these protections, in that:

- 1) They will promote and exacerbate density in the densest jurisdiction in Northern Virginia;
- 2) There is not existing or available infrastructure sufficient to support the overcrowding the proposed structures would produce;

- 3) Proposed structural heights and building masses would obstruct light and restrict airflow; and
- 4) Congestion and reduced parking will impede travel and exacerbate the problem of spillover parking that has for decades plagued homeowners and law enforcement in the West Glebe/Old Dominion area.

Third, the Small Area Plan that purportedly would allow for these projects is invalid. Numerous substantive comments submitted to the record by citizens and citizen groups in opposition to all or portions of the Plan were essentially ignored by the City. As a result, the proposed actions in the above-referenced docket items are also invalid.

Fourth, the dramatic increase in density in this area is being proposed as a means to increase affordable housing. At the same time, the City is claiming to preserve the character of the Arlandria-Chirilagua neighborhood. Both cannot be achieved. The mega-project submitted by AHDC needs to be substantially scaled back to fit within the context of the Arlandria-Chirilagua community. Otherwise, it is likely to destroy, or at least overwhelm, the neighborhood.

Fifth, as summarized in our letters and testimony at the Council Public Hearing on December 18, 2021 (*copy enclosed*), the City appears to contemplate potential co-location of businesses, housing, and other uses unrelated to core educational needs on a school site. The City is on notice that such uses would violate Commonwealth law and create unnecessary risks to students, staff, residents, and public safety personnel, and that expenditure of any public funds in furtherance of such would be illegal. The City, ACPS, and the School Board need to state whether they are considering going down that illegal path.

Thank you for this opportunity to comment.

Sincerely,



John Fehrenbach, President

cc: Alexandria City School Board  
Clerk of the School Board  
ACPS Superintendent Gregory C. Hutchings, Jr.

Enclosures





NRCA, P.O. Box 3242, Alexandria, VA 22302

December 16, 2021

Alexandria City Counsel  
301 King Street  
Alexandria, VA 22314

**Re: 12/18/21 Docket Item #15—Master Plan Amendment #2021-00012, Arlandria-Chirilagua Small Area Plan**

Dear Mayor and City Council Members:

North Ridge Citizens' Association (NRCA) wishes to comment directly to this body regarding our concerns about the proposed Small Area Plan (SAP) for Arlandria-Chirilagua, as we have done before the Planning Commission. (*See* enclosed Dec. 7, 2021 Letter.)

We recognize the City government's desire for building even more affordable housing in Arlandria-Chirilagua, as well as the economic pressures and profit-motives to redevelop that area. We also recognize that the City has tools to preserve existing, and encourage additional, affordable housing—including the authority to trade off against greater density, but we believe that those tools are being misused to over-develop the area to the detriment of current and future residents. Our major concerns include:

1. Substantial increases in the number of housing units—and thus the population—in Arlandria.
2. Accompanying increases in the population of school age children, likely more than proportionate to the total population compared to other sections of the City.
3. Increased school enrollments that will add to the overcrowding of City schools (while the possibility diverting school property to housing or other illegal uses has not been explicitly ruled out).
4. Increased traffic and congestion, especially on Mt. Vernon Avenue and Glebe Road, but also cut-through traffic in the surrounding neighborhoods, especially North Ridge.
5. The lack of Metrorail stations within walking distance or easy access to major un-clogged traffic arteries, in stark contrast to parts of Northern Virginia where density has been, or will be, substantially increased. Moreover, the streets in the neighborhood are narrow and already quite congested. The scale of the proposed added density simply does not fit the context of the neighborhood.
6. Loss of parking that serves Arlandria-Chirilagua residents, shoppers, restaurant-goers, and churchgoers, among others, and a substantial increase of spill-over parking in surrounding neighborhoods, which will undoubtedly lead to related stresses and disputes.

7. Radical alteration of the streetscape, with the loss of the characteristic Art Deco style on Mt. Vernon Avenue.
8. Maximum permitted heights that would, in many locations, be double what is permitted under existing zoning and would dwarf existing structures.
9. Loss of tree canopy as developers take the option of planting required trees elsewhere in the City.

We believe the enormous near-term impacts of the proposed changes are being underestimated and downplayed. Not only that, we fear the City is not giving enough consideration to second- and third-order effects down the road. Therefore, we request that:

- A. City Council defer approval of the proposed SAP to allow more time to study both the short-term and long-term implications.
- B. The City scale back the Alexandria Housing Development Corporation (AHDC) mega-project that is contemplated for the Safeway site at Mt. Vernon Avenue and Glebe Road and the adjacent lot on Mt. Vernon. Two buildings of 10 and 7 floors, respectively, with 475 new housing units, appear to be much more than could possibly be handled by the infrastructure that exists or is contemplated.
- C. Alexandria City Public Schools (ACPS) and citizen associations have the opportunity to provide explicit and transparent input to the planning process, since schools and students bear much of the brunt of redevelopment, and ACPS have the authority over the use of school sites.

We appreciate the opportunity to comment.

Sincerely,



John Fehrenbach, President

Enclosure



NRCA, P.O. Box 3242, Alexandria, VA 22302

December 7, 2021

Planning Commission  
c/o Department of Planning & Zoning  
P.O. Box 178  
Alexandria, VA 22314

Delivered Via Email: [PlanComm@alexandriava.gov](mailto:PlanComm@alexandriava.gov)

**Re: December 8, 2021 Docket Item #2, Master Plan Amendment #2021-00012—  
Proposed Arlandria-Chirilagua Small Area Plan (“SAP”)**

Dear Chairman Macek and Planning Commission Members:

North Ridge Citizens’ Association (“NRCA”) shares the following concerns regarding the above-referenced proposal for the draft of the Arlandria-Chirilagua Small Area Plan.

**1) The purported rezoning of the Cora Kelly Elementary School site violates Commonwealth law.**

The Plan (see Figure 7) appears to propose the rezoning of Cora Kelly School and the Armstrong recreation site for mixed commercial-residential-institutional use. As outlined in NRCA’s December 7, 2020 letter to the City (copy enclosed), Virginia law prohibits the planning, construction, and use of housing and other non-education related facilities on school campuses.<sup>1</sup> Further, the law restricts school site use determinations to the School Board. Plus, in numerous public comments on the Joint City-ACPS Facilities Master Plan [and other City proposals], Alexandria citizens overwhelmingly opposed mixed uses with housing at school sites. To our knowledge, no representative of City government—including ACPS or the School Board—has officially provided a written legal opinion that would support such a plan. The City needs to correct this illegal defect in the Plan, and make clear to the public that no funds or City staff time will be spent on such efforts.

**2) The City has not adequately accounted for a substantial increase in the number of new students that will be added to the school system with this significant development.**

The draft Plan acknowledges that Arlandria’s population has double the average number of children overall (20%) compared to the same population citywide, yet it does not include any meaningful and realistic planning information beyond an assurance that the City is “working with” ACPS on the Cora Kelly renovation. As you know, Alexandria is already dealing with tremendous challenges with school overcrowding, and it is highly probable that other schools may be impacted by a large increase in new residents.

Additionally, given Virginia safety/fire code guidance for elementary schools and the City’s updates to Open Space definitions, it appears that any additional allowances for

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<sup>1</sup> The letter also was copied to the ACPS Superintendent of Schools, City Council, Mayor, and City Manager.



height of the school building based on zoning “bonuses” for residential development could potentially reduce the maximum amount of open space available to students.

**3) Dramatically increasing density and traffic problems will adversely affect livability and quality of life for all area residents, including North Ridge.**

The enormous impacts of the proposed changes are grossly discounted and underestimated. North Ridge objects to the aesthetics of building exceedingly tall and large buildings in the neighborhood, which is presently composed mainly of single-family homes, townhouses, duplexes, garden apartments, and single-story retail with an Art Deco aesthetic. The increased density and sheer numbers of people will materially increase demands on existing green space and require a substantial increase in tree canopies and green space, yet the Plan does not adequately address these problems. Tall buildings may belong in National Landing/Crystal City office parks, but not in this location. The isolated high-rises in this neighborhood stick out and should never have been approved.

Realistically, increased traffic and a demonstrable lack of adequate street parking will ultimately discourage those who rely on private transportation from visiting, or even going near, businesses in the area.

The draft Plan states (p. 67), “The City will evaluate multimodal safety, access, connectivity, and curbside management (such as but not limited to on-street parking) along Mount Vernon Avenue and East and West Glebe Road and implement intersection and roadway improvements as shown in Figure 19.” Removing on-street parking along W. Glebe as part of a future “road diet” will exacerbate existing parking shortages along this road and surrounding streets (*e.g.*, Old Dominion and Brighton Court). Similarly, commuters who use this roadway (including ACPS/Chas. Barrett families) would suffer from the City’s plan to reduce the roadway to one lane in either direction.

**4) The Planning Commission should account for why the area from the W. Glebe Bridge to the Dominion Energy property at 907 W. Glebe Road is “to be evaluated as part of future planning process,” according to the Plan.**

If the City is contemplating different zoning classifications for this area, it should be addressed in an open, transparent fashion and not obscured. Additionally, if such deferrals in rezoning are allowed by law as part of the Small Area Plan process, the City should similarly defer any zoning/site uses for Cora Kelly Elementary to the School Board.

Thank you for this opportunity to comment.

Sincerely,



John Fehrenbach, President

cc: Alexandria City School Board  
Clerk of the School Board  
ACPS Superintendent Gregory C. Hutchings, Jr.

Enclosure



NRCA, P.O. Box 3242, Alexandria, VA 22302

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December 7, 2020

Alexandria City School Board  
Clerk of the School Board  
1340 Braddock Place  
Alexandria, VA 22314

**Re: Use of ACPS Campuses for Housing Projects**

Dear Chair Anderson and Board Members:

As you know, the North Ridge Citizens Association (NRCA) has been actively monitoring ACPS plans to modernize the George Mason Elementary School, located in our neighborhood. We are very appreciative of your efforts to involve our community in the planning process and have strongly conveyed our view that the limited space available on the George Mason site needs to be preserved for the core educational and recreational needs of our community. Public support is overwhelmingly galvanized in support of this approach, and City residents have vocalized opposition to colocation of housing on school grounds.<sup>1</sup>

Based on meetings held with you and Mayor Wilson in the spring, we were hopeful that there would be a prompt, public decision that no space could be spared for an affordable housing project on the George Mason site. Unfortunately, eight months have now passed and no such assurance has been provided.

We are instead aware that Alexandria City officials are continuing to press ACPS to use school campuses for affordable housing. The Director of the Office of Housing recently informed the community that it is a challenge to find enough land to meet the city's affordable housing needs and that they are accordingly looking for space on school campuses where developers can build and manage housing for those who are income eligible.<sup>2</sup>

In light of these developments, it is imperative to inform you of the evidence showing that Virginia law prohibits the planning and construction of affordable housing on the George Mason campus, and likely other existing ACPS school campuses. We hope that a prompt review of this legal issue by the School Board's independent counsel will prevent the further loss of time and money spent on the study of City-driven housing projects that cannot be built on school grounds. Otherwise, we are prepared to pursue additional actions that will ensure the Virginia laws protecting school property are enforced, including a review from the Virginia Department of Education. We believe that VDOE – as well as the courts – would prohibit the City's quest to colocate affordable housing on the George Mason site and others because (1) the School Board has exclusive authority to determine what structures should be built on the property; (2) the School Board has no authority to erect affordable

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<sup>1</sup> See results of Joint Facilities Master Plan Survey, October 2020.

<sup>2</sup> 11/19/20 High School Project Open House. The Director of Housing expressly confirmed that the City is not planning to limit occupancy to ACPS teachers. Emails from City staff obtained via FOIA also indicate the conclusion that the Fair Housing Act does not permit such limits.

housing on school grounds; and (3) the School Board has no authority to convey any portion of the site to the City for such a purpose.

As the City's October 2020 report on Affordable Housing and Colocation reveals, *the City failed to identify a single school board in the Commonwealth of Virginia that has ever authorized the construction of a housing project on a school campus*. This finding fully conforms to our understanding of the law, and was confirmed by ACPS staff during a presentation to the George Mason Task Force on December 1, 2020. Virginia School Boards have only been given authority to build and supervise schools, not housing. When City officials urged ACPS to allow housing developments on ACPS campuses at a meeting on January 27, 2020, you correctly told them: "[W]e're not the housing administration, we're the school system."<sup>3</sup> We hope that we can help you persuade the city to respect legal boundaries and to stop any campaign to gain control of school campuses to use for affordable housing.

**First, the School Board has exclusive authority to decide what structures should be built on the George Mason site.** Article VIII, Section 7 of the Virginia Constitution *mandates* that the local school board -- not the City government -- must be responsible for the supervision of the public schools. The Virginia Supreme Court has interpreted this provision to mean that school boards have the *constitutional obligation* "to determine whether a particular property is needed for school purposes and the manner in which it shall be used."<sup>4</sup> Based on the clarity of this constitutional mandate and the implementing statutes governing the power of Virginia school boards, the City Attorney has already acknowledged that ACPS has exclusive authority to determine what should be built on school sites.

In 2017, the City Attorney issued an opinion explaining that Virginia courts have held that the power to "determine the manner in which school property shall be used is vested exclusively with the local school board" and that City Council does not have "any general supervisory authority over the schools" (p. 1-2). The opinion also concludes (p. 3) that ACPS cannot "abrogate any of its independence with respect to its core responsibilities," which includes the design of the campus. City Attorney JoAnna Anderson also acknowledged at a meeting on January 27, 2020, that the City could not direct ACPS to build housing on school property.<sup>5</sup> There is simply no dispute that the School Board must decide for itself what to build on the school sites in the exercise of its constitutional mandate to supervise the public schools.<sup>6</sup>

**Second, state law prohibits the School Board from erecting affordable housing on the George Mason site.** State law and zoning code dictate whether multifamily housing can be erected on existing ACPS school sites. Specific to George Mason, Section 3-302 restricts residential units to single family homes in an R-8 zone. Even if the zoning laws were amended over strong community opposition, however, the School Board does not have the authority to construct affordable housing on this site.

In Virginia, the powers of local school boards are limited by a rule of strict construction called the Dillon Rule. Under this rule, a school board can only take actions that are expressly authorized by state statutes, fairly implied from the text of those statutes, or that are essential and indispensable to the performance of the school board's functions. Actions taken outside the scope of this limited authority are illegal, *no matter how much the City might seek the School Board's help* (see 2004 Op. Va. Att'y Gen. 04-074, which concludes that school board funds may only be used for the "establishment, support and maintenance of schools" and not other public purposes).

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<sup>3</sup> Alxnow.com/2020/01/28

<sup>4</sup> *Howard v. County School Board*, 203 VA 55, 58 (1961).

<sup>5</sup> Alxnow.com/2020/01/28.

<sup>6</sup> George Mason School is located on a single, undivided 9.4 acre parcel of land. Title is held in the name of the city but state law mandates that the School Board has the responsibility to "control the property of the school division," (VA Code 22.1-79.3), and the "official care and authority of a school board shall cover all territory" within the school boundaries even "when the title to such property is vested in the . . . city" (22.1-125(B)). The entire 9.4 acre parcel has the "legal description" of "George Mason School" in the city's property records and the ACPS 2015 Long Range Educational Facilities Plan describes the George Mason Elementary School "site" as 9.4 acres in size including the tennis courts and fields. (4.20-21).

The Virginia Code directly addresses the power of the School Board to construct buildings. Section 22.179(3) establishes that the School Board only has the power to “erect[] ... *necessary school buildings* and appurtenances.” An affordable housing development is obviously not a “school building” or a “necessary appurtenance.” This express limitation on the scope of the school board’s powers accordingly forecloses ACPS from erecting any affordable housing units.

This reading of the statutory language is further confirmed by Virginia Department of Education regulations. VDOE is required to establish minimum standards for all public school buildings and must approve every school board’s plans for construction (Section 22.1-138, 22.1-140). VDOE Guidelines for School Facilities in Virginia’s Public Schools provide “detailed guidance for the planning and design of local public school facilities” (p.vi) but nowhere make provision for housing in such facilities. The Guidelines emphasize that it is the school board’s responsibility to “develop a specific educational program” and then choose a school design necessary to “carry out the educational program.” The “educational program” for an elementary public school does not require affordable housing on the campus.

This conclusion is also borne out by the long history of public school projects in Virginia. It is telling that the City’s October 2020 report on Affordable Housing and Colocation does not cite a single example of a Virginia school board constructing housing on a public school site. School boards in Virginia do not build housing because their sole power and responsibility is to build and supervise schools. Cities and counties build and supervise affordable housing. The six examples cited as precedent for the City’s proposal to use ACPS property for housing have no bearing on the School Board’s authority to build affordable housing on school grounds under Virginia law. Not only were all of the projects built in other states, at least three of the projects were not built on public school property.<sup>7</sup> The remaining projects involved teacher housing in two states that adopted legislation expressly authorizing school districts to build housing for teachers on school property. The City is clearly not proposing to collocate teacher housing. Moreover, there is no similar Virginia statute that expressly permits building any type of housing on school property.

The Commonwealth’s own Constitution imposes exclusive responsibility on school boards to supervise schools, not housing, and the implementing legislation expressly limits the school board’s power to the construction of “necessary school buildings.” The fact that some other state with different laws allowed the use of school property for housing has no legal relevance to the scope of a Virginia school board’s authority.<sup>8</sup> As a Dillon rule jurisdiction, any co-location of affordable housing on school board property in Virginia is illegal under state law.

**Third, the School Board has no authority to convey any portion of the George Mason site to the City or developers for the construction of affordable housing.** ACPS has repeatedly recognized that it does not have enough land to meet the current needs of the school system, let alone the future needs created by an expanding population.<sup>9</sup> It is inappropriate and short-sighted for the City to continue engaging in unfounded efforts to press the School Board to transfer control of school property to the City for affordable housing projects. It is not simply bad policy to prioritize new housing units over the future of our schools and our students. It is also foreclosed by Virginia law.

Under Virginia law, the School Board is obligated to “*control* the property of the school division” (Section 22.1-79(3)). This power must be exercised by the School Board and cannot be abrogated by transferring control of the school’s real estate to city officials except under very limited circumstances. Under the explicit language of

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<sup>7</sup> The website for the teacher housing referenced in New Jersey indicates that the housing was built on land owned by a private developer and that the schools in the development are “charter” schools, not public schools. The website for the East Harlem project cited in the report also involves a charter school and housing built on land owned by the city’s housing authority. The teacher housing referenced in North Carolina was built by a private charity on land owned by the county according to published news accounts.

<sup>8</sup> Three of the six examples involve housing built on public school property in California and Florida. In both states, special legislation was enacted to authorize the construction of teacher housing, but does not extend to affordable housing generally. The third example concerns a yet-to-be-approved project in Florida, which also enacted legislation expressly authorizing teacher housing on school property. See FL Statutes Section 1001.43(12).

<sup>9</sup> The September 14, 2020 community presentation of the Joint Facilities Master Plan emphasized that “population is projected to continue growing” and predicted the addition of more than 30,000 people by 2040.

Section 22.1-129, the School Board can only convey its real property to the City (or a developer) when the school system has “no use” for the property. That legal requirement forecloses the City’s efforts to colocate housing at George Mason -- and most likely other campuses as well.

The School Board could not possibly determine in good faith that it has “no use” for *any* portion of the George Mason site, or any other campus. George Mason is not large enough for the current modernization project, let alone future expansions. In 2015, ACPS and the City issued its Long Range Educational Facilities Plan and adopted the goal of “meeting the [VDOE] guidelines” governing the size of a campus needed for educational and recreational purposes (p. 3.12). The LREFP emphasizes that the campus must be large enough because it is “important for students to recreate, have access to explore nature, and learn in an outdoor classroom.” This goal cannot be achieved if any portion of the site is devoted to housing. In order to comply with the VDOE Guidelines, *the entire parcel* must be dedicated to educational and recreational space. Under Section 3.2 the School Board should have at least a 10-acre site for an elementary school designed for 600 students (ACPS is projecting 670 students for the 9.4 acre site). In addition, VDOE guidelines emphasize the need to “provide for future expansion” in the planning process and to obtain “additional acreage where possible” in order to “allow for future growth and flexibility” (p. 2, 8). It is accordingly not possible for the School Board to conclude that it has “no use” for any portion of this site.<sup>10</sup> No portion of the property can be conveyed to the City, or to any developer(s) for construction of housing.<sup>11</sup>

While some City officials are pressing the School Board to help the City meet its affordable housing goals, Virginia law is clear. The “school board may not abrogate its duties or compromise its independence with respect to its core responsibilities” (2011 Op. Va. Att’y Gen. 10-122). The School Board can only use its real estate for “school buildings” and *not* for the provision of affordable housing. It would be incomprehensible for the Board to declare existing property to be “surplus” when there is such overwhelming need for expanded school capacity and ACPS re-opening during the COVID-19 pandemic. Thank you for your consideration and we look forward to working with you.

Best regards,



Chuck Kent  
President, North Ridge Citizens’ Association

cc: Mayor & City Council  
Mr. Mark Jinks, City Manager  
Mr. Gregory C. Hutchings, ACPS Superintendent of Schools

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<sup>10</sup> The LREFP was developed to “identify the types of facilities that can best meet education needs over the next 25 years” (Executive Summary at p. 1). There is *no reference* in the LREFP “master plan” to an educational need for public housing on school properties.

<sup>11</sup> ACPS acknowledged at a December 1, 2020 meeting with the George Mason Task Force that the Minnie Howard campus is too small to meet VDOE guidelines for the planned enrollment -- even without the allocation of any portion of the site to housing.

Comments to City Council Public Hearing 18 Dec 2021  
Sunny Yoder on behalf of North Ridge Citizens Association  
Docket item #15 Arlandria-Chirilagua Small Area Plan

Good day Mr. Mayor and Members of the Council:

My name is Sunny Yoder. I own a home in Braddock Heights. I serve as chair of the land use committee of the North Ridge Citizens Association and speak on behalf of the Association.

We believe the enormous near-term impacts of the changes to Arlandria-Chirilagua that are contemplated in the proposed Small Area Plan are being drastically underestimated and downplayed. Not only that, we fear the City is not giving enough consideration to second- and third-order effects down the road. Therefore, we make three requests:

First, City Council needs to defer approval of the proposed Small Area Plan to allow more time for both the careful, rigorous study of the short-term and long-term implications of large-scale redevelopment, and meaningful citizen and taxpayer input.

Second, the City needs to scale back the Alexandria Housing Development Corporation (AHDC) mega- project that is contemplated for the Safeway site and the adjacent lot on Mt. Vernon. Two buildings of 10 and 7 floors, respectively, with 475 new housing units, are much more than could possibly be handled by the infrastructure that exists or is achievable.

Third, Alexandria City Public Schools (ACPS) and citizen's associations must have the opportunity to provide explicit and transparent input to the planning process. Schools and students bear much of the brunt of redevelopment, and, after all, ACPS has the authority over the use of school sites.

The reasons for our requests are our concerns about the following:



1. Substantial increases in the number of housing units—and thus the population—in Arlandria.
2. The accompanying increases in the population of school age children, likely more than proportionate to the total population compared to other sections of the City.
3. Increased school enrollments that will add to the overcrowding of City schools. And the City is not ruling out the conversion of school property to housing or other potential uses in violation of Commonwealth law.
4. Increased traffic and congestion, especially on Mt. Vernon Avenue and Glebe Road, and cut-through traffic in the surrounding neighborhoods, especially North Ridge.
5. Dramatically increased density, even though the streets in the neighborhood are narrow and already quite congested, there are no Metrorail stations within walking distance, and no easy access to major un-clogged traffic arteries. (This is in stark contrast to other parts of Northern Virginia where density has been, or will be, substantially increased. )
6. Loss of parking that serves Arlandria-Chirilagua residents, shoppers, restaurant-goers, churchgoers, and others, with a substantial increase of spill-over parking in surrounding neighborhoods, which will undoubtedly lead to related stresses and disputes. Instead of improving the area, the Plan will create a traffic and parking mess that will put the area on the list of places to avoid rather than visit.

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7. Radical alteration of the streetscape, with the loss of the characteristic Art Deco style on Mt. Vernon Avenue.
  8. Maximum permitted heights that would, in many locations, be double what is permitted under existing zoning and would dwarf existing structures.
  9. Loss of tree canopy as developers take the option of planting required trees elsewhere in the City.

*The scale of what is being proposed simply does not fit the context of the Arlandria-Chirilagua neighborhood.* We recognize the City government's desire for building more affordable housing there, as well as the economic pressures and profit-motives to redevelop that area. We also recognize that the City has tools to encourage additional, affordable housing—including the authority to trade off against greater density, but we believe that in this instance those tools are being misused to overdevelop the area to the detriment of both current and future residents.

If you approve this plan, in our view you will be responsible for helping to destroy—or at least overwhelm—the very neighborhood you claim to want to preserve. It is a bad trade-off.

Thank you. I will send these comments to Ms. Sitton so they can be placed in the record.

## Anh Vu

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**From:** Ingris Moran <imoran@tenantsandworkers.org>  
**Sent:** Tuesday, January 4, 2022 4:31 PM  
**To:** PlanComm; Anh Vu  
**Cc:** eurrutia@tenantsandworkers.org; Helen McIlvaine; Justin Wilson; Amy Jackson; John Chapman; Canek Aguirre; Gloria Sitton  
**Subject:** Letter Re: AHDC's Arlandria Project  
**Attachments:** Jan 4 2022 letter to planning commission.docx

Dear Members of the Planning Commission,

I hope this finds you well. Please find attached a letter from Tenants and Workers United with reference to Alexandria Housing Development Corporation's Mt. Vernon and Glebe Road Project, Docket Item #6 & #7 in tonight's, Planning Commission meeting.

Please feel free to email me if you have any questions or concerns .

If this letter can please be forwarded to Councilwoman Bagley, Gaskins, Councilman McPike and City Manager Parajon as I could not find their emails on the City's website.

Thank you



January 4, 2022

Dear Chair, Vice Chair, Planning Commissioners, and City Staff,

My name is Ingris Moran. I'm a lifelong resident of Arlandria and the Lead Organizer of Tenants and Workers United (TWU).

What makes TWU unique is that we are deeply rooted in the low-income immigrant community and keenly aware of their needs, especially on housing.

At one of your December meetings, TWU expressed our concerns with the Arlandria Small Area Plan due to its lack of clarity on how the city will guarantee affordability and ensure that all affordable housing, both new and preserved, is sustainable and remains affordable over time with guaranteed access to affordable units (and the prevention of displacement) for current, existing residents with preference for new and created affordable units being given to those who already reside in Arlandria.

We are aware that there are developments that will soon be coming to the Arlandria neighborhood and we are looking to the city to see how you will react. What you do will directly impact working-class families of color, and your actions will determine whether or not our families, especially those earning between 30% and 40% of the area median income (AMI), will be displaced or will be able to continue living in the city they call home.

Today, AHDC will be presenting their project for Arlandria/Chirilagua. This project will be very important to Arlandria residents because it exceeds the city's compliance requirements on affordability, providing more than 100 units for families earning 40% AMI. This development is a great initiative and should be used as an example of the possibilities for inclusive housing in our city and should serve as a model for future developments. This development has truly heard and responded to the needs of the families currently living in the neighborhood.

The city should support projects like this one by ensuring:

- The approval of the added density
- Funding of the financial gaps in this project and future resource allocation to ensure long term affordability of the units
- Prioritized leasing for current Arlandria Chirilagua residents
- Support for residents in the ready-to-rent process

We know the Planning Commission will be seeing other development proposals that will not be friendly toward nor inclusive of our community – projects that could potentially displace our community in the near future. We hope you can see AHDC's project as a positive one for the most vulnerable residents – those who call Chirilagua home – and we hope that you will seriously consider the possibilities for inclusion and racial equity in all housing developments.

Thank you for your time and attention.

[EXTERNAL]Support for AHDC in Chirilagua

Jonathan Krall <jonathan.f.krall@gmail.com>

Tue 1/4/2022 4:37 PM

To: PlanComm <PlanComm@alexandriava.gov>

Cc: Zeina Azzam <azzam.zeina@gmail.com>; Lindsay Stuart <lindsay.stuart09@gmail.com>; Shira Loev Eller <shira.loev@gmail.com>; Kevin Brady <krbrady1919@gmail.com>; Ed Kemp <edkemp101@gmail.com>; Rebecca Loesberg <rebecca.loesberg@gmail.com>

[You don't often get email from jonathan.f.krall@gmail.com. Learn why this is important at <http://aka.ms/LearnAboutSenderIdentification>.]

Greetings,

I won't be able to attend this evening because internet is out at my house, but I did want to state that Grassroots Alexandria is fully supportive of the AHDC project in Arlandria/Chirilagua. This project will help mitigate a severe housing crisis in this neighborhood, where market rate units are likely to be driven out by Amazon-related development. This neighborhood is a unique cultural treasure. It is vulnerable because so many residents have only working class incomes. Please approve the AHDC project

Thanks,

Jonathan Krall  
speaking for Grassroots Alexandria  
grassrootsalexandria.org  
6a E Mason Ave, 22301  
703 477 4186

CC: steering committee and housing team members

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