



DOCKET ITEM #6
Zoning Text Amendment #2022-00005
Bonus Height

Issue: Initiation and Public Hearing and consideration of a Text Amendment to the Zoning Ordinance to amend section 7-703(B) to allow bonus height to be utilized in zones with 45 foot height limits and prohibit the use of bonus height for single-family, two-family, or townhouse dwellings.	Planning Commission Hearing:	June 23, 2022
	City Council Hearing:	July 5, 2022
Staff: Karl W. Moritz, Director, P&Z Christina Zechman Brown, Deputy City Attorney Nancy Williams, Assistant Director, P&Z Patrick Silva, Urban Planner, P&Z Tamara Jovovic, Office of Housing Karl.moritz@alexandriava.gov Christina.brown@alexandriava.gov Nancy.williams@alexandriava.gov Patrick.silva@alexandriava.gov Tamara.jovovic@alexandriava.gov .		

I. ISSUE

Alexandria City Council approved Resolution 2926 on March 14, 2020 endorsing the Metropolitan Washington Council of Government's (COG) Regional Housing Initiative (RHI). The RHI calls for an additional 75,000 units of housing across the region from 2020-2030 to help address an acute housing shortage. This goal is above the 320,000 units needed in response to projected regional job and population growth over the same period. Seventy-five percent of the additional units are recommended to be affordable to households of low- and moderate-incomes and located near activity and transit centers. Resolution 2926 calls for the establishment of a City target to help meet the RHI goal. While approximately 800 market-rate and affordable units of housing are currently generated per year in Alexandria, meeting the RHI goal involves the production of an estimated additional 300 units per year, of which 75 percent are recommended to be affordable. This represents an estimated additional 2,250 affordable units over the 10-year period, with part of the timeframe overlapping with the City's 2014-2025 Housing Master Plan (HMP) goal.

To broaden Alexandria's inventory of programs to assist in meeting its housing affordability needs, the City instituted *Zoning for Housing* which is a program designed to study the potential removal of regulatory barriers to housing production in a manner that also focuses on the retention of quality of life factors around health, services, amenities, accessibility, the environment, and infrastructure. The Bonus Height Zoning Text Amendment proposal which would allow the use of Section 7-703(B) in zones with height limits of 45 feet or more is the subject of this staff report and is one of the initiatives which staff has studied to help the City meet its RHI target under *Zoning for Housing*. Staff is recommending approval of this Text Amendment, which has been refined through community engagement, because it addresses a critical need in this City while continuing to employ mechanisms that ensure that additional height is compatible with adjacent structures and neighborhoods. At the core of the Bonus Density and Height Program of Section 7-700 is the idea that the affordable housing gained through incremental increases in density and height is a positive exchange. Additionally, by its nature and in alignment with the City's All Alexandria Resolution, the initiative provides affordable housing opportunities in locations that might otherwise not receive them, and this specific proposal could increase the likelihood of affordable housing in projects that are more mid-scale. Moreover, each project approved through this proposal would be reviewed rigorously and through a public process to ensure that additional density and/or height is designed in a way that respects the neighborhood. The requirement that a project using this provision obtain a Special Use Permit means that all impacts of the project are thoroughly reviewed and mitigated as a condition of approval.

II. BACKGROUND

(A) *Housing Affordability Need*

The City continues to face a shortage of affordable housing due to projected job and population growth, most visible in the levels of housing cost burden (households paying more than 30 percent of their income for housing) faced by low- to moderate-income renter households (see text box). The demand for affordable housing—fueled by the disconnect between wage and housing cost growth—has been exacerbated by the loss of approximately 14,300 or 78 percent of market-affordable units in the City between 2000 and 2020. Notably, this challenge has been magnified by the pandemic which further highlighted the vulnerability of thousands of Alexandria households who experienced income loss and housing insecurity and/or suffered disproportionate health impacts due to sharing of housing resources.

Approximately 15,000 low- to moderate-income Alexandria renter households (defined as households with incomes of up to \$75,000) are estimated to pay more than 30 percent of their income on housing in the City (ACS 2016-2020 5-Year Estimates). Approximately 7,200 of these households with incomes up to \$50,000 were acutely housing cost burdened defined as spending 50 percent or more of their income on rent and utilities (ACS 2016-2020 5-Year Estimates).

The 2014-2025 Housing Master Plan (HMP) outlines policies and strategies to help address the unmet demand for affordable housing through 2025 and established a goal of creating 2,000 units with new affordability through that period. As of March 2022, 1,476 units had been constructed or preserved, 106 units were under construction, and 1,042 new or preserved units were in the pipeline. With the completion of its pipeline units, the City will meet its HMP goal and begin to work toward achieving its RHI commitment.

(B) *Washington Metropolitan Council of Government's Regional Housing Initiative*

Alexandria has made tremendous progress towards its HMP goal as a result of its varied and innovative programs, partnerships, and funding sources for affordable housing. However, as noted earlier, there remains a critical need throughout the region. Also, as noted earlier, this expanded need was the impetus for COG and its member jurisdictions to step forward in 2018-2019 and identify a collective strategy titled the Regional Housing Initiative (RHI), to help meet the projected need for additional housing production and affordability over the 10-year period from 2020-2030, above what jurisdictions are currently planning. The 75,000 additional units under RHI are to be located near transit and activity centers which will make them attractive to new businesses seeking to move to this area and to existing businesses seeking to expand/maintain their business within industries that are important to the region's economic health and vibrancy. Such locations will also be advantageous and attractive to households seeking to be near work and services, lessening commute time and thus lessening impacts on the environment while increasing healthy living in walkable and multi-modal, amenity-enriched areas. Under the RHI, 75 percent of all new units should also be affordable to low- and moderate-income households, recognizing that this area is a high-cost area where housing and the cost of living can be challenges for many households, especially those working one or two wage jobs at a time. Affordability becomes even more of an issue today as inflation rates across many economic sectors continue to rise.

(C) Alexandria's Zoning For Housing Program, Phase I

An approach to more housing production and affordability is the dismantlement of regulatory barriers, keeping in mind that to do so requires continued sensitivity to those regulations which *keep communities healthy and viable places to live, work, raise families and thrive*. In 2020, staff identified potential regulatory proposals to study, which could lead to more housing options and affordability within the City. It then engaged in targeted initial stakeholder outreach on a package of potential regulatory proposals to study under the umbrella of the *Zoning for Housing* Program. A chart on page 11 of this staff report lists the outreach conducted in 2020 in the development of the currently phased *Zoning for Housing* Program.

Phase I of *Zoning for Housing* consists of several regulatory proposals with a number of them reaching fruition in FY 2021 and 2022. The proposed Bonus Height Zoning Text Amendment, the subject of this staff report, is also scheduled for Phase I, with background, analysis and recommendations included in the coming pages.

Phase I of Zoning for Housing consists of several regulatory proposals with a number of them reaching fruition in FY 2021 and 2022. The proposed Bonus Height Zoning Text Amendment, the subject of this staff report, is also scheduled for Phase I, with analysis, recommendations, and community outreach in the coming pages.

(D) Phase I Zoning for Housing Initiatives approved by City Council to-date with Community Input

The *Zoning for Housing* proposals which have been approved to-date include a number of Minor Updates to the Zoning Ordinance that do not entail policy changes. Such updates primarily focus on technical corrections. In addition, Phase I of *Zoning for Housing* has resulted in two new regulatory programs which can offer affordable housing options and they are described below.

After staff analysis and community input on recommendations, the [Accessory Dwelling Unit Program](#) was approved by the City Council in January 2021. Community engagement, including a survey and public meetings occurred around this program's study and recommendations. Accessory Dwelling Units (ADUs), commonly referred to as "in-law apartments" or "granny flats," are secondary, independent living units that typically have a separate kitchen, sleeping area and bathroom. ADUs can assume different forms including basement apartments, converted garages or new structures detached from a primary residence. ADUs can:

- Bring in rental income that helps cover housing costs for both first-time homebuyers and long-time Alexandrians at risk of being priced out of the City;
- Provide on-site housing options for multi-generational families, caregivers for seniors and persons with disabilities, live-in childcare providers and other caretakers;
- Enhance housing affordability for the City's workforce, including recent graduates and young professionals.

[Twenty-two \(22\)](#) ADUs have been approved thus far under the City's ADU Program.

The City's Co-Living Program is also part of Phase I of Zoning for Housing. The [City's Co-Living Program](#) was approved in January 2022. Community engagement, including two surveys and public meetings, occurred around this program's study and recommendations. Co-living living arrangements are known by many different names and forms, but generally offer individuals who are unrelated a private living space as well as access to communal areas like kitchen, bathrooms, and living spaces.

The Co-living umbrella encompasses terms such as rooming and boarding houses, single room occupancy, and some types of group living arrangements. Co-living can provide greater housing choice for people of all ages, abilities and incomes; increase the potential stock of market rate affordable units; and preserve social and cultural diversity through mixed-income communities.

(E) Two additional Phase I Zoning for Housing Proposals are Pending

The [Auxiliary Dwellings within Commercial Zones](#) proposal is pending in Phase I of *Zoning for Housing*. Auxiliary dwellings are not new to the City of Alexandria. They are currently known as "accessory apartments" in the Zoning Ordinance and are classified as residential units that have been allowed above existing commercial spaces.

Current regulations vary in the number of accessory apartments permitted in each zone, ranging from 2 to 4 units, and they are only permitted above the first floor of retail/commercial spaces. The City is updating the regulations to make the rules consistent across zones and allow flexibility for where a unit can be located within a structure.

Community engagement on the Auxiliary Dwellings in Commercial Zones proposal has included a web page, a Community Meeting, presentations at two Planning Commission public hearings and opportunities for comment through email or phone. This proposal is currently docketed for consideration and review by the Planning Commission on June 23 and City Council on July 5.

(F) Creation of Section 7-700 of the Zoning Ordinance (Bonus Density and Height Program)

Zoning Ordinance [Section 7-700](#) was established to incentivize the production of affordable housing through market-rate development and help provide a broader distribution of housing opportunity across the City. The program permits, through a Special User Permit process, bonus density of up to 30 percent, unless otherwise authorized by the underlying Small Area Plan ([Section 7-703\(A\) – Bonus Density Provisions](#)) and Bonus Height of up to 25 feet in exchange for affordable rental or for-sale units or an equivalent monetary contribution to the Housing Trust Fund ([Section 7-703\(B\) – Bonus Height Provisions](#)). The Bonus Height provision is restricted to those zones with height maximums greater than 50 feet. Bonus Density and Height can be paired in those zones in which the latter can be requested.

A minimum of one third of the density granted through Bonus Density and/or Height is required to be provided as committed affordable housing. Resulting units (referred to as set-aside units) are affordable to households with incomes between 60% and 100% of the area median income (AMI), AMI (Table 1). Rental units are designed to serve households at 60% AMI and for-sale units at approximately 70-100% AMI.

Table 1: 2022 Area Median Household Incomes for DC Metro Area

Income range	1-Person	2-Person	3-Person	4-Person
40% AMI	\$39,880	\$45,560	\$51,240	\$56,920
50% AMI	\$49,850	\$56,950	\$64,050	\$71,150
60% AMI	\$59,820	\$68,340	\$78,860	\$85,380
70% AMI	\$69,790	\$79,730	\$89,670	\$99,610
100% AMI	\$99,700	\$113,900	\$128,100	\$142,300

Source: HUD 2022

Section 7-700 has created 167 affordable units in market-rate projects to date; in addition, market-rate developers have pledged 149 units during this period. Non-profit developers have also utilized the tool at the Station at Potomac Yard, Alexandria Crossing at Old Dominion, Jackson Crossing, The Bloom, Fairlington Presbyterian (The Waypoint at Fairlington), as well as in the recently approved AHDC West Glebe/Arlandria redevelopment project.

(G) Amendments to Section 7-700

Section 7-700 was first amended in January 2014 at the recommendation of the HMP to introduce flexibility and enhance its impact by allowing an applicant to receive additional density if authorized within the relevant small area plan. Using this provision, the 2015 Eisenhower West Small Area Plan permits bonus densities in excess of 20 percent (the Plan predated the 2017 amendment discussed below), and the 2019 Eisenhower East Small Area Plan Update and the 2021 Arlandria-Chirilagua Small Area Plan permits bonus densities in excess of 30 percent.

Most recently, the program was further amended in May 2017 to increase the Bonus Density limit from 20 to 30 percent to maximize the production of affordable housing. Following the approval of that amendment, nine market-rate and affordable housing projects pursued density bonuses in excess of 20 percent resulting in 207 units pledged or constructed.

(H) Proposed Text Amendment to 7-703 (B) Bonus Height Provision

The proposed Bonus Height Zoning Text Amendment entails a single change to [Section 7-703\(B\) \(Bonus Height Provisions\)](#) of [Section 7-700 of the Zoning Ordinance \(Bonus Density and Bonus Height Program\)](#). It would allow the Bonus Height provision to be utilized in zones with height limits of 45 feet or more. Currently it can be utilized in zones with a height of more than 50 feet, representing a limited change of 6 feet. It would **not** change the 25 foot limit on allowable, additional height under Section 7-703(B); it would **not** change the requirement for submittal of a public hearing Special Use Permit application to utilize Section 7-703(B), including public comment; it would **not** change any provisions of the Height District regulations referenced under Section 7-703(B); and it would add clarifying language that the change could **not** be applicable to single-family, two-family or town home dwellings.

The purpose of the current proposed Text Amendment is to broaden the applicability of the Bonus Height provision to permit its use in areas with maximum height limits between 45 and 50 feet.

III. STAFF ANALYSIS

(A) Examination of Bonus Height Regulations in Other Targeted Cities

In an effort to identify opportunities to make the Bonus Height provision of Section 7-700 a more widely usable tool for the creation of new affordable housing, staff reviewed similar Bonus Height incentives in other jurisdictions. Staff found that several similar Bonus Height provisions are currently utilized by jurisdictions across the country, the goals and utility of which vary in their application. For example, in 2021 Arlington County, Virginia approved an update to the County's Bonus Height Program with a more focused approach to permit 60 feet of Bonus Height for multi-family residential projects providing 100 percent of their units as affordable. In 2018, the Philadelphia City Council approved an update to its Zoning Ordinance to add a provision which offers Bonus Height in exchange for the provision of affordable housing on a sliding scale. In this program, varying amounts of Bonus Height can be achieved depending on both where a project is located, with a higher height bonus able to be achieved in areas with higher permitted density and heights, as well as the type of affordability a project provides, with projects which provide deeper affordability being able to achieve greater bonuses.

(B) Discussion of Existing Bonus Height Regulations

As noted, per Section 7-703(B), the Bonus Height that can currently be achieved in exchange for the provision of affordable housing is a maximum of 25 feet with the exception that no building located in any zone or Height District where the maximum allowable height is 50 feet or less may be allowed to exceed such height limits. While approximately 35 projects, including affordable housing developments, have secured a Special Use Permit to utilize the bonuses available via Section 7-700 to-date, only 13 of those projects have utilized the application of Bonus Height. To further address the urgent need for more affordable housing within the City, staff wished to determine both the reasons for the Bonus Height provisions underutilization by developers as well as the ways in which the Bonus Height provision of Section 7-700 could be amended in order to promote its wider use while maintaining a sensitivity to a project's existing neighborhood context.

(C) Analysis of Existing Bonus Height Regulations

The existing Bonus Height regulations allow for a maximum of 25 feet of Bonus Height to be granted to projects providing low- and moderate- income housing units at a number equivalent to at least one-third of the total increase achieved by the bonus, or a contribution to the City's Housing Trust Fund in an amount equivalent to the value of the units that would have been provided, but only in zones or Height Districts with a height maximum of more than 50 feet. As a result, a number of zones, in which additional height may be appropriate, prohibit the application of the Bonus Height achievable via the provisions of Section 7-703(B) (Attachment #2). To further encourage utilization of the Bonus Height provision of Section 7-700, staff undertook an evaluation of a number of potential options for modernizing the program.

(D) Analysis of Potential Options

Following an examination of the utilization of the City's existing Bonus Height provision, as well as a review of similar Bonus Height provisions in municipalities across the country, staff narrowed their scope of consideration to three potential options: (1) Option #1 - increasing the achievable Bonus Height value from its current maximum of 25 feet while keeping the height maximum of zones in which it could be applied at 50 feet; (2) Option #2 - retaining the achievable height bonus value at its current maximum of 25 feet while eliminating a height threshold for the zones in which it could be applied; and Option #3 - keeping the achievable height bonus at its current maximum of 25 feet while lowering the height maximum of the zones in which it could be applied.

In considering the above options, staff concluded that, while Options #1 and #2 had the potential to increase use of the Bonus Height provision of Section 7-700, the potential negative impacts of these approaches, including outcomes where projects featured building heights that would render them incompatible in relation to their context, outweighed the potential benefits resulting from these options. Ultimately, staff concluded that Option #3 provided the greatest enhanced flexibility for the use of Bonus Height in additional areas of the City, while simultaneously maintaining safeguards against incompatible heights by keeping a height maximum for areas in which the bonus can be used in place.

IV. DISCUSSION OF PROPOSED TEXT CHANGES

(A) Recommended Option

In considering an update to the Bonus Height provision of Section 7-703(B) of the Zoning Ordinance to lower the maximum height threshold for zones under which up to 25 feet of Bonus Height could be added to a project in exchange for the provision of affordable housing, staff analyzed several criteria. One criterion is ensuring that projects which choose to use the Bonus Height provision would remain compatible with the building heights of their surrounding context. For this reason, staff limited their scope of consideration to zones with height maximums of 45 feet or more; the scale of buildings in zones with height maximums of 35 feet is such that if a maximum Bonus Height of 25 feet were to be applied to a project in such a zone, the likelihood of a resulting incompatibility in building height would be much higher. However, staff analysis found that 25 feet of additional height in zones with height maximums of 45 feet or more was much less likely to create situations of perceived incompatibility (Figure 1 and Figure 2). In addition, enabling the Bonus Height provision of Section 7-703(B) to be used in zones with height maximums of 45 feet or more represents the smallest possible change to the existing regulations that would result in the ability to apply Bonus Height in a wider array of zones across the City. Furthermore, as an additional protective measure and criteria to mitigate potential negative outcomes relating to the use of Bonus Height, the current proposal would also formally prohibit Bonus Height from being used in relation to single-family, two-family, or townhouse dwelling types. In doing so, staff aims to further prevent the use of Bonus Height in areas of the City and in building typologies where additional height would not be appropriate.



Figure 1 – Rendering of a 45-foot building with two additional stories



Figure 2 - Pedestrian perspective

Another criterion for consideration is that the use of the Bonus Height provision of Section 7-703(B) in all zones in which height maximums fall within the range of 45 feet to 50 feet (Figure 4) is not likely to result in the same frequency of application across all of these zones. This can be primarily attributed to three characteristics which vary across the zones in which height maximums fall within the aforementioned range: permitted uses, maximum permitted density, and other related regulatory considerations and Special Use Permit conditions.

- Regarding permitted uses, not all zones that have height maximums in the range of 45 to 50 feet allow residential uses which may request Bonus Height as permitted uses (i.e., townhouse zones). This would result in a scenario in which the use of the bonus height provision is not possible in these zones.

- Regarding maximum permitted density, not all zones that have height maximums in the range of 45 feet to 50 feet allow for the same level of density. As adding additional height to a project would increase the project's overall Floor Area Ratio (FAR), the use of Bonus Height, therefore, becomes more likely in zones which allow for higher density.
- Regarding other related regulatory considerations, it should be noted that to fit the added density onto a site, the site needs not only to meet the FAR but, along with that, the additional factors to accommodate applicable open space, setbacks, etc. in addition to meeting further City and public hearing Special Use Permit regulations/conditions pertaining to infrastructure and related considerations.

Accounting for these considerations, the proposed Text Amendment would potentially open an additional 12.7 percent of the City to the ability to request Bonus Height in exchange for the provision of affordable housing (Figure 3).

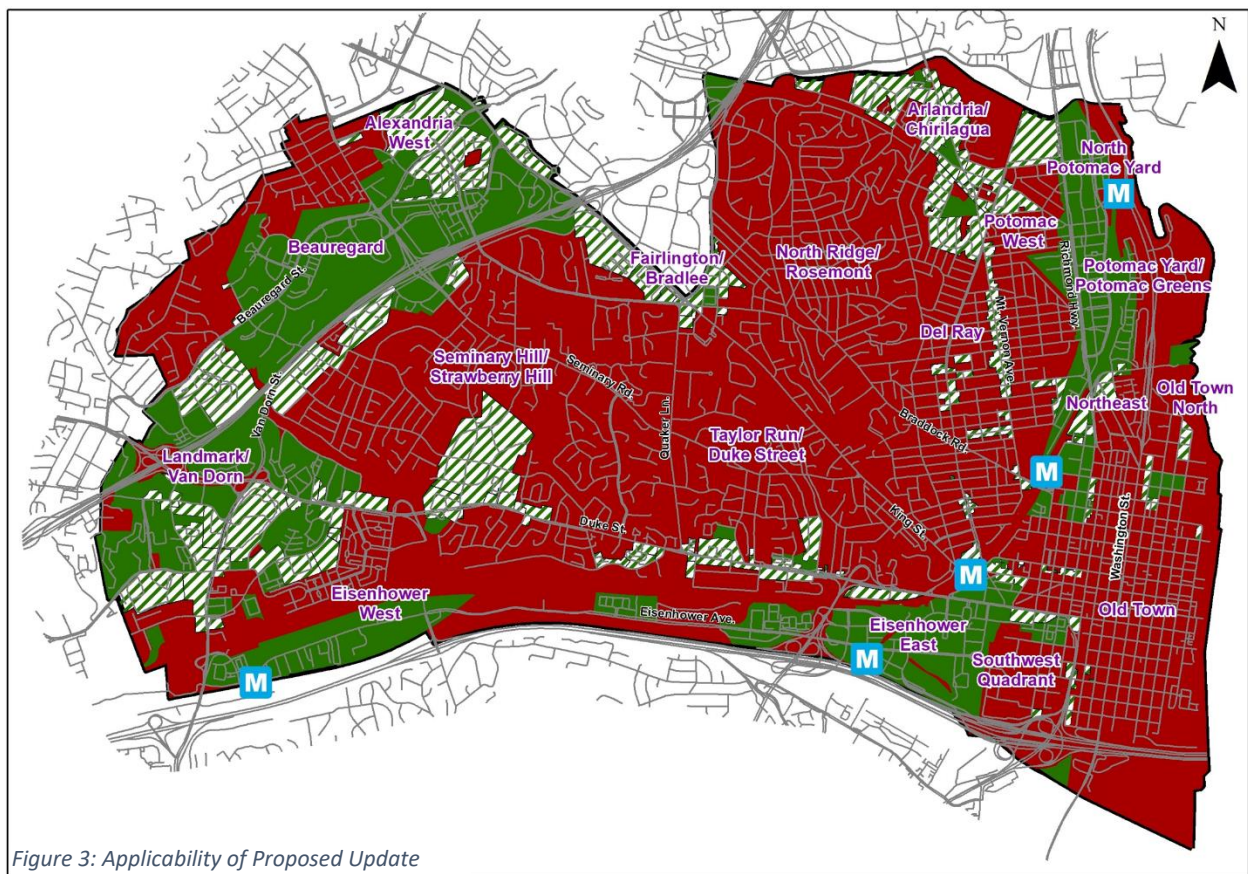


Figure 3: Applicability of Proposed Update

Legend

- 7-703(B) Cannot Be Requested
- 7-703(B) Can Currently Be Requested
- 7-703(B) Could Be Requested with Approval of Proposed Updated

Note: Staff has made every effort to ensure the accuracy of this map as of May 2022. Property owners are entitled to request Rezoning, which can impact height limits, including those imposed by height districts. Rezoning requests are evaluated for consistency with Small Area plans and other criteria and require community outreach and public hearings prior to consideration by the Planning Commission and City Council.

Note: In all cases, the ability to utilize the bonus height achievable via Section 7-703(B) is subject to a public hearing process and City Council's approval of a Special Use Permit.



V. Community Outreach

(A) *Zoning for Housing Program - Phased Studies Outreach*

Dating back to 2020, the City conducted public outreach relating to a phased *Zoning for Housing* Program and the identification of regulatory initiatives, within that Program, to be studied with community input. As noted previously, a Bonus Height Zoning Text Amendment was one of the initiatives identified to be studied in Phase I (FY 2021 and FY 2022).

The early outreach surrounding the *Zoning for Housing* Program phases is noted below.

EARLY ZONING FOR HOUSING STAKEHOLDER OUTREACH ON DRAFT MARCH 2020 PRIORITIZATION PLAN	
January 11, 2020	Housing Summit
January 16, 2020	ARHA Redevelopment Work Group Meeting
February 6, 2020	Alexandria Housing Affordability Advisory Committee
February 10, 2020	TES and DOH Input
February 18, 2020	AEDP
February 19, 2020	NAIOP
February 21, 2020	City's Equity Core Team – Equity Plan
February 27, 2020	Federation of Civic Organizations
February 28, 2020	Government Alliance for Racial Equity Cohort – Equity Plan
March 3, 2020	Planning Commission
May – June 2020	City Council Briefings & Public Hearing

(B) *Proposed Bonus Height Zoning Text Amendment Outreach*

The City undertook the following outreach: established a [Bonus Height Webpage](#); developed and posted Frequently Asked Questions (FAQs) in English, Spanish and Amharic; conducted two virtual community meetings--on April 12 (130 attendees) and May 19 (90 attendees); addressed questions during the meetings and posted Questions/Comments/Responses subsequent to the meetings; and advertised engagement opportunities through eNews and directly to Civic Associations and to those who contacted the City by email or other communication.

PROPOSED BONUS HEIGHT ZONING TEXT AMENDMENT MEETINGS	
April 7, 2022 7:00 PM	Planning Commission Public Hearing – Discussion Item of the Proposed Bonus Height Text Amendment
April 12, 2022 6-8:00 PM	Virtual Community Meeting #1
April 13, 2022	Alexandria Housing Affordability Advisory Committee Briefing
April 20, 2022	NAIOP Government Affairs Committee
May 19, 2022	Virtual Community Meeting #2
June 23, 2022	Planning Commission Public Hearing
July 5, 2022	City Council Public Hearing

(C) Public Comments and City Responses

One frequent concern from the public related to whether the proposal would be used with single family, two story and townhome dwellings. The City has included language in the proposed Text Amendment clarifying that it would not be applicable to those dwellings. Another common question was whether it would change regulations under the City Height District regulations. The Height District regulations are not proposed for change under this Text Amendment.

The request for clarity on the Text Amendment’s applicability was addressed through the preparation and posting of a map (see page 12); this map was also shared during the May 19 Community Meeting presentation. Additionally, questions pertaining to the COG RHI, affordable housing, and other topics were documented, responded to, and posted online in the [April 12 Questions/Comments/Responses](#).

(D) NAIOP Meeting

NAIOP is an organization of development industry professionals; staff meet regularly with the local chapter of NAIOP on a range of development topics. Members asked for greater clarity regarding the applicability of the Text Amendment in the City. The above map is designed to help address that question. A question pertaining to applicability to Coordinated Development Districts was also raised and addressed in the April 12 Questions/Comments/Responses.

(E) AHAAC Meeting

Staff provided a general overview of the proposed Text Amendment to the Alexandria Housing Affordability Advisory Committee (AHAAC). There was discussion on how the development review process incorporates a range of opportunities for community input and feedback, including opportunities to discuss how potential impacts of increased height could be proactively

addressed and/or mitigated. Members also inquired how the proposed Text Amendment would apply to existing Small Area Plans, in particular in Arlandria and the West End.

(F) *Planning Commission*

In a public briefing, the Planning Commission provided general comments which included a recommendation to hold an additional community meeting, which was subsequently held on May 19, and to clarify presentation graphics.

VI. RECOMMENDATION

Staff recommends that the Zoning Text Amendment, contained in Attachment #1, be initiated and recommends approval of the attached Zoning Ordinance text changes.

Staff:

Karl W. Moritz, Director, P&Z
Christina Zechman Brown, Deputy City Attorney
Nancy Williams, Assistant Director, P&Z
Patrick Silva, Urban Planner, P&Z
Tamara Jovovic, Office of Housing

Attachment #1 – Proposed Text Amendment

7-703(B) - Limits on increases which may be allowed.

1. Height increases pursuant to this section are not permitted for single-family, two-family, or townhouse dwellings.
2. Height may not be increased pursuant to this section by more than 25 feet beyond the height otherwise permitted by this ordinance; provided, however, that no building located in any zone where the maximum allowable height is less than 45 feet or height district where the maximum allowable height is 50 feet or less may be allowed to exceed such height limit.

Attachment #2: Floor Area Ratio (FAR) and Height Limits by Zone (CDDs Not Included)

Zone	FAR	FAR w/ SUP	Max height	Height w/ SUP	Notes
RA/ Multifamily	0.75		45'		
RB/Townhouse	0.75		45'		
RCX/Medium density apartment	1.25		50'		
RC/ High density apartment	1.25		150'		
RD/High density apartment	N/A		150'		No maximum FAR applies
RM/Townhouse	1.5		35' - 45'		
RS/Townhouse	0.75		35'		
RT/Townhouse	0.5		35'		
CL/Commercial low	0.75		35'	45'	
CSL/Commercial service low	0.75		50'		
CG/Commercial general	0.75		50'		
NR/Neighborhood retail (Arlandria)	0.5	1.5	50'		
CD/Commercial downtown	1.25		50'		
CD-X/Commercial downtown (Old Town North)	1.25	2.0	SAP		
OC/Office commercial	1.25		50'		
OCM(50)/ Office commercial medium (50)	1.5		50'	77'	
OCM(100)/ Office commercial medium (100)	1.5		100'	150'	
OCH/Office commercial high	1.25-2*	3.0**	100'	150'	*If located within 1000 ft of Metro may develop to 2.0; **3.0 with an SUP
CRMU-L/ Commercial residential mixed use (low)	1.0	1.5	SAP		
CRMU-M/ Commercial residential mixed use (medium)	1.0	2.0	SAP		
CRMU-H Commercial residential mixed use (high)	1.25	2.5	SAP		
CRMU-X/ Commercial residential mixed use (Old Town North)	1.5	2.5	SAP		1.5 for townhouse use only. Multifamily will require a SUP and can use 2.5 FAR
KR/King Street urban retail	1.25** 1.25*** 2.0*** (if located within 1000' of Metro Station)	2.5** 3.0*** (if located within 1000' of Metro Station)	50'** King Street Metro Station Height District***		NOTE: For residential uses only **For properties east of South Peyton Street on the south side and east of Harvard Street on the north side of King Street ***For properties west of South Peyton Street on the south side and west of Harvard Street on the north side of King Street



Alexandria, Virginia

Historic Alexandria Resources Commission

*220 North Washington Street
Alexandria, Virginia 22314-2521
(703) 746-4554*



May 19, 2022

Ms. Nancy J. Williams
Assistant Director
Department of Planning and Zoning

RE: Potential Amendment of Height Limits to Encourage Affordable Housing

Dear Ms. Williams:

The Historic Alexandria Resources Commission (HARC) is charged with advising the City of Alexandria on "the responsible stewardship of this unique, historic city," including by such means as "preserving historic sites and buildings," "developing our city in directions that do not threaten its historic integrity," "preserving the historic cultural diversity of the city," and "building a sense of community identity and continuity." The commission includes representatives of seventeen organizations and nine individual at-large members supporting historic preservation, and we are keenly interested in proposals which we think may enhance or impair the city's ability to preserve, protect, and celebrate its historic resources.

We write with regard to the proposed "Draft Text Amendment to the Bonus Height provision of Section 7-700 of the Zoning Ordinance to allow bonus height to be utilized in zones with height limits of 45 feet or more," as presented at your April 12, 2022 Informational Meeting. HARC discussed that proposal at its April 19 and May 17, 2022 meetings, and now writes to submit our comments and recommendations based on the limited available information.

We are aware of the shortage of affordable housing in Alexandria and strongly support reasonable, balanced efforts to overcome that problem. We also understand that the proposed amendment is intended to help alleviate that shortage.

In addition to affordable housing, there are other factors that are important to the economy and vitality of our city that must also be considered. Alexandria is one of the top tourist destinations in the nation due in large part to our historic character. Visitors bring substantial revenue to our city. Our historic character also attracts residents who cherish our heritage to the extent that they have bought historic homes in Alexandria. We are charged with preserving and enhancing those irreplaceable resources that drive a significant portion of our services.

We believe that the proposed bonus height text amendment could have a profound negative effect on the Old and Historic Alexandria District, the Parker-Gray Historic District, the historic Town of Potomac in Del Ray, and other historic properties throughout the city. The potential damage to those resources could be dramatic; its full extent would depend on the language of the amendment and the scope of its applicability.

Section 7-700 by its terms is not limited in any way to specific zones, districts, or areas of the city. The Old and Historic Alexandria and Parker-Gray Districts are presently governed (with few exceptions) by 45' and 50' height limits, and the preponderant construction is overwhelmingly of low- to moderate-scale residential buildings which are well within those limits—as they have been since the inception of those Districts and, indeed, since the establishment of the City. An amendment of Section 7-700 extending the allowance of 25' of bonus height to any zones citywide that are presently limited to 45' or 50' heights would, in effect, establish new height limits of 70' and 75' or more throughout the Historic Districts. Allowing buildings of such height in the Historic Districts would be entirely inappropriate. Such a result would be entirely inconsonant with the longstanding and fundamental policy and purpose of those Districts. Amendment of Section 7-700 to allow greater height limits in and near historic resources should not be considered or adopted.

Impact on Alexandria's Historic Districts

The Historic Districts include many of Alexandria's most notable historic sites and properties, including many whose importance is reflected in their representation on the Historic Alexandria Resources Commission, such as Carlyle House, the Lee-Fendall House, Christ Church, the Old Presbyterian Meeting House, the Athenaeum, and the Torpedo Factory. They include many of the historical treasures owned and operated by the City itself, such as Gadsby's Tavern, the Stabler-Leadbeater Apothecary Museum, the Lyceum, the Alexandria Black History Museum, Lloyd House, The Friendship Firehouse, Murray-Dick-Fawcett House, Contraband and Freedmen Cemetery Memorial—and very soon, the extraordinary Freedom House Museum.

Several of these properties are individually listed on the National Register of Historic Places and the Virginia Landmarks Register, as are many others in the Historic Districts including the Alexandria Union Station, Alfred Street Baptist Church, St. Paul's Episcopal Church, Fairfax-Moore House, the Bank of Alexandria, the Moses Hepburn Rowhouses, Dr. Albert Johnson House, the City Hall itself, and many others. The Alexandria Historic District and Parker-Gray Historic Districts in their entirety are listed on the National Register in their own right. All of these historic resources, and their collective importance to Alexandria's heritage, its character, its economy and its attraction of visitors from across the nation and worldwide, would be jeopardized by the adoption of a 70-75' height limit in and near the Historic Districts; such a proposal should not be countenanced.

Information on Applicability and Impact of the Text Amendment

A proposed Text Amendment of this complexity and far-reaching effect should be preceded by the best possible understanding and informed discussion by the public and by the policy-making bodies which are to consider it. Materials and illustrations furnished to the public thus far fall short of that standard. Two of the maps in the material for the April 12, 2022 Informational Meeting illustrate the concern.

A color-coded "Map of Relevant Zones" displays zones with height maximums of 45'-50' throughout the city. The areas that are not colored presumably have height limits of other than 45' or 50', if any; but it is not clear from the display alone what those limits are, or whether they are already eligible for the bonus height allowance of Section 7-700. An accompanying map illustrates by color coding those areas with "Potential for Application of Updated Bonus Height Provision (7-703(B))"; but without a larger scale, it is difficult to understand with any assurance which plots or properties would be affected.

We note that the great preponderance of the zones that would be affected by the amendment, because they presently have height maximums of 45 or 50 feet, is concentrated in the Old and Historic Alexandria and Parker-Gray Historic Districts, and in the Del Ray sector. (Del Ray has not been formally established as one of the City's Historic Districts; but as the site of the National Register-listed Town of Potomac it is characterized by an important historic character in its own right, and many of the same considerations that relate to the Old Town and Parker-Gray Districts are applicable here as well.)

Similarly, the areas assessed by staff as having the "most potential" for application of the amended bonus height provision—and thus for heights increased from 45-50' to 70-75'—are concentrated within the Old and Historic Alexandria District and North Old Town; "moderate potential" is anticipated along Duke Street and areas in the West End—and again, in Del Ray.

Better public understanding and informed discussion would also be encouraged if the precise text of the proposed Text Amendment were published, to enable exact comparison of the present and proposed ordinance sections. This would of course be a necessary predicate to action by the Planning Commission; the sooner it could be published the more usefully it would inform public discussion.

Strengthening the City's Affordable and Workforce Housing Strategy

The City already reports admirable progress toward its 2025 Housing Master Plan goal of 2,000 units with new affordability by 2025 and the Council Of Governments Regional Housing Initiative based target of 2,250+ more affordable and workforce units by 2030, with 1,718 units completed, under construction, or in the development pipeline to date. This progress has been achieved without raising the height limits in the Historic Districts to 70-75'.

Alexandria should redouble and extend its commitment to the production and preservation of affordable and workforce housing that meets or exceeds these goals. It should concentrate its effort on those zones and districts where focused effort is most likely to achieve the most rapid progress and most effective long-term result, and where the potential for negative impact on the existing built environment is likely to be the least because the area is already characterized by significant multifamily residential or mixed use structures of more substantial density and height.

Summary

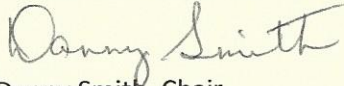
Prudent management of our valuable resources challenges us to pursue additional affordable housing without jeopardizing the unique historic fabric that provides irreplaceable drivers for our interwoven economy. Solutions should be focused on a more targeted strategy that preserves historic resources in historic districts and other areas while yielding comparable or better affordable housing results. Zoning provisions should guide planning and developers in that direction and we encourage you and your team to take the lead in this regard.

At this point, we and other interested citizens lack clear and unambiguous information on the specific height limit amendments that are being contemplated, how they will be implemented, and how any negative impacts would be avoided. This absence of clarity and transparency unfortunately makes it difficult to provide informed specific advice and counsel. However, based on public briefings to date, we

must convey our strong concerns about allowing buildings in and near our historic districts and other historic resources to exceed the current, established limits for any reason.

We are grateful for the generous contribution of your time and attention to date, and we stand ready to advise and assist you as best we are able as this project proceeds.

Respectfully submitted,

A handwritten signature in cursive script that reads "Danny Smith".

Danny Smith, Chair

Historic Alexandria Resources Commission

cc: Gretchen Bulova, Director
Office of Historic Alexandria

**ALEXANDRIA HISTORICAL RESTORATION
AND PRESERVATION COMMISSION**



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220 NORTH WASHINGTON STREET
ALEXANDRIA, VA 22314-2521
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To Whom It May Concern,


We, the members of the Alexandria Historic Restoration and Preservation Commission, offer the following comments about the proposed text amendment to the zoning ordinance for Bonus Height as an incentive for developers to include affordable housing. The primary activity of this commission is to acquire easements on open spaces, historic interiors and facades as well as, to protect the fabric of historic structures in general. We feel that a blanket change of zoning areas presently limited to 50' and 45' heights would be harmful to the work of this commission and ultimately to our historic heritage.

It has already become difficult for AHRPC to obtain applications leading to easements from property owners wary of giving oversight of a portion of their property to the commission. A blanket change without any respect to the preservation of the historic district will impact the work of this commission making it more difficult for us to encourage property owners to donate interior and open space easements. We fear that taller buildings will most likely reduce the perception of privacy in residential yards and could drive a trend to further develop on the open spaces on significant historic properties. In addition, this zoning change has the potential to increase traffic and noise that could encourage owners to further alter historic properties in an attempt to moderate these effects, reducing their likelihood of considering historic easements. Most importantly, larger buildings will visually dominate our small historic structures and change the character of the area to such an extent that the historic value of preserving the history of our surviving buildings and open spaces may be lost on an already reluctant applicant.

Aside from the direct consequences of this text amendment to preservation, we feel it will also negatively impact the historic districts in unconsidered ways. Alexandria takes pride in our historic districts, and the figures who lived and worked here whose lives are woven into our nation's origin story. We have made an effort for generations to preserve and restore the history of our buildings and people, laboring to create a walkable friendly environment where this rich history can be explored and honored. Increasing the building heights in the historic districts will undermine these efforts. Towering buildings that transform our streetscape will be alien to our residents and make it harder for visitors to visually and mentally transport themselves back in time. The authenticity of the historic districts of Alexandria make our city a uniquely desirable place to live, work and visit. Let's not destroy our precious heritage.

We urge the members of City Council to protect our historic districts by maintaining current height limits in the historic districts.

Sincerely,


Susan Horne, Chair



[EXTERNAL]Docket - PC agenda for 6/23

Chuck Weber <croweber@gmail.com>

Thu 6/9/2022 2:36 PM

To: PlanComm <PlanComm@alexandriava.gov>

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

I am concerned with the very unclear wording in the proposed text amendment #2022-00005.

Old town has 45 foot height limits, yet this amendment seems to indicate that ANY project other than single family, two-family, and townhouses can be granted bonus height . So, can any commercial property in Old Town be allowed to go up to 75 feet. That was not my understanding from discussions with the BAR.

Language proposed needs clarification.

Thx for your consideration.

Chuck Weber
407 S Saint Asaph Street

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