



DOCKET ITEM #8
Environmental Action Plan Phase 2
Green Building and Land Use and Open Space Chapters

Application	General Data	
Public hearing and consideration of the Green Building and Land Use and Open Space chapters for Phase 2 of the Environmental Action Plan.	Planning Commission Hearing:	June 4, 2019
	City Council Hearing:	June 22, 2019
Applicants: City of Alexandria Staff: Departments of Planning and Zoning and Recreation, Parks, and Cultural Activities.		

Staff Recommendation: APPROVAL

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I. DISCUSSION

The Planning Commission plays a central role in advancing the environmental principles of the Environmental Action Plan (EAP) through its review of policy initiatives and development proposals that apply, particularly, to the EAP Green Building and Land Use and Open Space chapters. As the Commission's recommendations for the EAP Phase 1 short-term actions were adopted by the City Council in October 2018, its recommendations regarding the Phase 2 proposed actions are viewed as important contributions to ensuring the balance of social, economic and environmental factors in building a sustainable Alexandria.

BACKGROUND

EAP 2009

City Council adopted the Environmental Action Plan 2030 in June 2009, following the guiding principles of the Eco-City Charter. The EAP consists of 10 chapters: Transportation, Green Building, Air Quality, Water Resources, Environment and Health, Energy, Land Use and Open Space, Solid Waste, Global Climate Change and Other Emerging Threats, and Implementation, Outreach, and Education.

EAP Phases 1 and 2

The City launched a two-phase update to the EAP in September 2017 as a majority of the short-term actions established in 2009 had been achieved and that creating new EAP goals, targets, and actions was essential as climate change impacts became more evident and the City's environmental priorities had evolved. Phase 1 identified goals and short-term action items (FY2019-FY2023) for five chapters: Energy, Climate Change, Solid Waste, Green Building, and Land Use and Open Space. City Council approved Phase 1 at its October 15, 2018 public hearing.

Phase 2 proposes short, mid (FY2024-FY2029), and long-term (beyond FY2040) action items for the remaining five program areas: Transportation, Air Quality, Water Resources, Environment & Health, and Implementation, Outreach and Education. At the same time, additional short-term and new mid and long-term goals for the Energy, Climate Change, Solid Waste, Green Building, and Land Use and Open Space chapters are also proposed for City Council review in June 2019.

II. SHORT, MID AND LONG-TERM ACTION RECOMMENDATIONS – PHASE 2

The staff Phase 2 EAP recommendations for the Green Building and Land Use and Open Space chapters, to be presented to the City Council on June 22, 2019, are included in this report on pages 7 through 16. These are the result of a City inter-departmental endeavor, collaborating with Environmental Policy Commission (EPC) members and the public, to develop new short, mid, and long-term actions that advance public well-being and City sustainability.

Green Building

Fulfilling Green Building EAP Phase 1 short-term action 3.1.1, the Green Building Task Force developed an update to the Green Building Policy between November 2018 and April 2019 for Planning Commission review on June 4 and City Council consideration on June 22. As updates to the policy were drafted, new short, mid and long-term actions evolved that supported the implementation and advanced the programming of the Green Building Policy through 2040. These were a result of Task Force and staff deliberations based on the Integral Group consultant recommendations and from public comments generated at Task Force meetings and Eco-City outreach events.

The proposed Green Building chapter actions 3.1.3 through 3.1.17 are designed to further reduce the environmental impacts of new and existing buildings and are related to future updates of the policy. These actions represent initiatives that require time to establish, such as developing a performance monitoring program, establishing incentives for new private development and existing buildings, creating a performance-based procurement process to reduce costs of Net Zero Energy (NZE) projects, and initiating and completing a NZE pilot program to standardize the practice of net zero public building construction. As a long-term goal, staff recommends that the Green Building Policy is updated regularly every five to seven-years as needed, with a Task Force, to incorporate the short and mid-term programmatic items into the Green Building Policy as they are implemented.

Other actions promote green building practices for existing, privately-owned buildings, such as the implementation of a C-Pace (Commercial Property Assessed Clean Energy) financing initiative for existing commercial buildings and homeowner and contractor educational programs, appear in the Energy and the Education, Implementation and Outreach chapters, respectively.

Land Use and Open Space

Enhancing the City's tree canopy and open space are two focus areas comprising the Land Use and Open Space chapter of the EAP. Although the Department of Parks, Recreation and Cultural Activities (RPCA) is the lead department for implementation of the tree canopy actions, the Department of Planning and Zoning ensures that the City's tree canopy goals are met through development and non-development reviews. Further, The Department of Planning and Zoning led the update of the Landscape Guidelines, in partnership with RPCA, accomplishing short-term action 4.1.1 with City Council adoption in February 2018. The Landscape Guidelines support increased tree preservation, expansion, maintenance, and native species in the City. Regarding open space, RPCA monitors and maintains the City's public open space and the Department of Planning & Zoning balances private and public open space needs in Small Area Plans and development reviews.

RPCA has proposed long-term goal 4.1.5 to enhance the City's tree canopy coverage through a 2029 update to the Urban Forestry Master Plan which supports increased tree preservation, expansion, maintenance, native species, and a revised tree canopy coverage goal.

The proposed mid-term actions for the Open Space subchapter are prioritized recommendations from the Open Space Master Plan. This includes developing a plan for the City's stream valleys to protect valuable lands for both ecological and recreational benefits. This is particularly important as land around streams redevelops and opens opportunities for coordinated streambank projects. The EAP, per the Open Space Master Plan, also recommends seeking unconventional spaces for recreational and/or green infrastructure, particularly within the City's more urban neighborhoods.

Further, the RPCA Open Space Steering Committee, established in response to a short-term action, will re-assess the methodology, policies, and tools for evaluating future publicly accessible open space sites, whether through acquisition, easements, or development. Through this process, the work group will also evaluate the potential to increase the current open space ratio of 7.3 acres per 1,000 to 7.5 acres per 1,000. The findings of the Steering Committee will direct mid and long-term actions, in addition to short-term actions already identified in the EAP.

Implementing short-term action 4.2.3 for an open space and private development study, the Department of Planning & Zoning, in concert with RPCA and Transportation & Environmental Services (T&ES), is engaged in a discussion series with the Planning Commission, Environmental Policy Commission, and Park and Recreation Commission to explore the quantitative and qualitative factors of open space in new development. To-date, the discussion has presented the compliance of recent development with the quantitative requirements for open space in new development, and the qualitative factors of successful development centered around four roles or categories: form definition, visual relief, provision of outdoor living, and environmental infrastructure. The discussion series will continue with a Joint Work Session in May with the three commissions and with the Planning Commission at its June 4 hearing. The topic of discussion for these forthcoming meetings will be the creation of a list of Shared Expectations for open space in new development. EAP mid and long-actions may be developed based upon the endorsement of the Shared Expectations.

Summary

Staff believes that the proposed short, mid, and long-term actions proposed for the Green Building and Land Use and Open Space chapters of the EAP will contribute to the overall EAP sustainability goal to improve the social, economic, and environmental well-being in the City of Alexandria. The Departments of Planning & Zoning, Recreation, Parks and Cultural Activities, General Services, Transportation & Environmental Services and the Office of Housing recommend approval of the proposed Green Building and Land Use and Open Space chapters.

3. Green Building

The Green Building section's goal to optimize the economic, environmental, and social performance of new and existing buildings in the City of Alexandria is a multi-departmental effort to reduce GHG emissions and to improve air and water quality through development of greener buildings. The updated target and actions build on the successes of the 2009 Green Building Policy and the current standard development conditions which resulted in nearly 10 million square feet of green building built in the City, equating to approximately 95 percent of new development square footage in compliance with the policy.

The 2019 Green Building Policy is the focus of the EAP 2040 Green Building section. The update of the Green Building Policy in June 2019 (a short-term action adopted in Phase One in October 2018) involves the coordination and expertise of the Green Building Policy Update Task Force in addition to the Departments of Planning & Zoning, General Services, Transportation & Environmental Services, Code Enforcement, Office of Housing and Office of Management and Budget.

The policy sets cutting-edge green building standards for new, large-scale private and public development, with the City leading by example through increased certification level of green building performance, plus an enhanced focus on net zero energy buildings, and overall reductions in energy use, stormwater treatment, improved water efficiency, and indoor environmental quality. The actions in this section coordinate with other EAP actions to evaluate and develop additional programs that incentivize green building, measure and monitor building performance and set a pathway to achieve net zero energy in new and existing City-owned buildings. The process and updated policy inform the short, mid, and long-term goals of this EAP section, contributing to overall City sustainability.

As most communities are primarily comprised of existing buildings, the performance characteristics of both new and existing buildings will have an impact long into the future. For the 2015 GHG inventory, existing buildings accounted for 57 percent of GHG emissions in the City.

Goal Optimize the economic, environmental, and social performance of new and existing buildings in the City of Alexandria.

Target By FY2019, the Green Building Policy will set expectations for how both new and existing buildings should contribute toward achieving the goals for GHG emissions, water use, and stormwater runoff reduction established in the EAP, and by FY2020 will set forth a path for new city-owned buildings to meet a net zero energy standard. The City will maintain the same level of policy compliance as in the first decade since its adoption.

3.1 Green Building Policy

Update will be considered by the Planning Commission and City Council in June 2019. Mid- and long-term actions for the Phase II Update of the Environmental Action Plan is being developed concurrently with the outcome of this update.

Short-Term Actions

3.1.1 Review the effectiveness of the current Green Building Policy and update the Policy in FY2019 with a focus on sustainable strategies that have the greatest impact toward achieving targets across EAP principle areas. The Task Force deliberations will inform the medium and long-term EAP actions for Green Buildings. Through this process, with support of third-party consultant analysis, the update will consider topics such as:

- Increasing LEED or equivalent third-party green building certification standards for private development;
- Establishing a separate green building standard, which includes evaluating the feasibility of a net zero standard where applicable, for new public development, including schools in collaboration with ACPs;
- Establishing incentives for private development participation in green building certifications, to achieve the quantifiable goals for GHG emissions and water use and stormwater runoff reduction established in the EAP;
- Prioritizing specific green building elements;
- Introducing mandatory and/or voluntary green building practices for existing buildings (including historic) and for small buildings not subject to site plan review;
- Instituting a building performance monitoring program;
- The City's ability to be more ambitious than the private sector in meeting green building goals to serve as a sustainability leader, and
- Establishing a Green Zone in the City per the legislative authority of 58.1-3854, Creation of local green development zones for tax incentives, permit fees, special zoning, and exemption from ordinances.

As part of this process, a Green Building Policy Update Task Force will be established by City Council. The Task Force, with critical input from the EPC and

the development community, will determine the actual topics to be analyzed by the consultant.

Cost Estimate: \$75,000

Cost Breakdown: The funds will be used for consultant studies on policy analysis on a cost analysis. Does not include staff time.

- 3.1.2. By FY2020, evaluate additional sustainable features to incorporate into the “Building Section” of the standard development conditions for the Development Site Plans (DSP) and Development Special Use Permits (DSUP) that will contribute toward achieving targets across EAP principle areas.

Cost Estimate: Existing staff resources

NEW Short-Term Actions:

- 3.1.3. Update the Concept 2 Development Plan Checklist to include a requirement for a preliminary compliance narrative that indicates the applicant development team is aware of the City’s Green Building Policy and understands how it is applied.

Cost Estimate: Existing staff resources

- 3.1.4. Update checkpoints within the development review process to track compliance with the Green Building Policy.

Cost Estimate: Existing staff resources

- 3.1.5. Update standard development conditions for projects subject to the new Policy to include the following topics:

- Staff access to performance data
- Sub-metering of EV charging stations (so that whole-building metering is not affected)
- Optional energy metering in multifamily and hotel developments
- Optional enhanced commissioning measures in private development

Cost Estimate: Existing staff resources

- 3.1.6. Establish incentive programs that encourage green building renovations for existing buildings, such as encouraging property owners and leasing agents to participate in a Green Lease Leader program.

Cost Estimate: Existing staff resources

- 3.1.7. Establish a process for evaluating Net Zero Energy standards in new public buildings, including applicable guidelines, standards, and rating systems.

Cost Estimate: Existing staff resources

- 3.1.8. Start a pilot program that includes documentation of the procurement/reporting process to construct one net zero energy (NZE) public building.

Mid-Term Actions

- 3.1.9 Evaluate regulatory incentives linked to specific green building performance measures for new private development:
 - Establishing a City-wide Green Zoning Overlay (e.g., incentivizing solar panels and wind turbines through additional building height or allowing floor area exclusions to accommodate passive design elements).
 - The feasibility of permitting bonus building height and density (once affordable housing bonuses are first exhausted) for applying green building practices above those outlined in the new Green Building Policy.
- 3.1.10 Establish a Performance Monitoring Program for private development as staffing resources become available to manage the Program and track green building certification through the development review process.
- 3.1.11 Evaluate the possibility of establishing a fee-in-lieu program for projects that are unable to comply with the Green Building Policy.
- 3.1.12 Complete a pilot program to construct one net zero energy (NZE) public building.
- 3.1.13 Establish a standardized process for NZE public buildings city-wide.
- 3.1.14 Investigate the feasibility of performance-based procurement for the NZE construction of public buildings.
- 3.1.15 Complete a study of feasibility and methods to achieve net zero energy in existing building renovations, including the ability to achieve LEED Zero or other applicable net-zero certification processes in existing LEED certified buildings.

Long-Term Action

- 3.1.16 Schedule future administrative updates to the Green Building Policy to coincide with changes in third-party certification, the revisions to the state Building Code and the implementation of programs established through the EAP actions, with major updates for City Council every 5-7 years as needed. To maintain alignment with the intent of this Policy, Performance Points may be adjusted over time to correspond with updates to the rating systems, revisions to the building code, and/or updates to state, federal, or other City policies.

All Actions

Cost Estimate: \$120,000

Cost Breakdown: One FTE to implement and manage Actions 3.1.7 through 3.1.16

Legislative Priorities

1. Enable local jurisdictions to require energy performance disclosure by private building owners and/or utility companies.
2. Advocate for local building code authority to create, implement, and enforce a local green building code.

Justification

Green building practices are an important instrument in reducing GHG emissions and energy use, potable water consumption, raw materials use, and waste output. Green Building methods also contribute to increased air quality, reduced storm water pollution, reduced energy demands, and economic sustainability.

Accountable Parties

Planning and Zoning (primary); General Services; Office of Housing; Code Administration; Transportation and Environmental Services (EV charging and stormwater); Office of Management and Budget (performance procurement process).

4. Land Use and Open Space

The City of Alexandria is committed to protecting and promoting public open space with a healthy tree canopy. It is an investment in a higher quality of life for residents, visitors, and future generations. We seek to protect public open space because:

- It connects the community: Our parks and facilities are the public's common ground that equitably bring together our vibrant and diverse community.
- It improves well-being: Our programs and facilities motivate the community to make healthy choices and live active lifestyles through all stages of life and at all levels and abilities.
- It is an investment in our environment: Our commitment to natural spaces provides physical, mental, and community benefits, while offering opportunities to engage with and conserve our natural resources.

The City has achieved a tree canopy of 36 percent in 2016 and (planted about 800 trees per year over the last several years) and exceeded the 2009 goal of 100 new acres of open space (maintained a ratio of 7.3 acres per 1,000 residents). The EAP actions align with the Open Space Master Plan (2003, updated 2017) and the Recreation, Parks and Cultural Activities Strategic Plan to increase the tree canopy to 40 percent by 2035. The Department of Planning and Zoning development process supports the tree canopy and open spaces goals of this section and balances the private and public open space needs in Small Area Plans and in private and public development and non-development projects.

4.1 Tree Canopy

Goal Preserve and expand a healthy urban tree canopy.

Target By FY2035, average overall tree canopy is a minimum of 40 percent.

Short-Term Actions

- 4.1.1 By FY2023, update and coordinate the Urban Forestry Master Plan, Environmental and Sustainability Management System (ESMS), and Landscape Guidelines (updated in FY2019) to support increased tree preservation, expansion, maintenance, native species, and a revised tree canopy coverage goal.

Cost Estimate: \$40,000 per year

Cost Breakdown: \$30,000 - \$40,000 per year. \$30,000 for the yearly tree inventory study plus \$10,000 for the tree canopy survey scheduled for every three years. Existing staff resources are accounted for in current budget.

- 4.1.2 By FY2023, enlist City partnerships (community groups) to provide education and outreach that support technical assistance and opportunities to increase native tree canopy coverage on private property.

Cost Estimate: Existing staff resources

- 4.1.3 By FY2028, develop an urban forest health index rating system to determine the current and ongoing health and health needs of the urban forest in Alexandria.

Cost Estimate: \$100,000

- 4.1.4 By FY2028, develop a program that supports the planting of trees on private property, commit funding to establish the program and support ongoing implementation.

Cost Estimate: \$25,000/year

Long-Term Actions

Update the Urban Forestry Master Plan ten (10) years after approval in 2019.

- 4.1.5 By FY2029, update the Urban Forestry Master Plan to support increased tree preservation, expansion, maintenance, native species, and a revised tree canopy coverage goal.

Cost Estimate: \$30,000

4.2 Open space

Goal Increase open space quantity and improve the environmental quality, management, and social benefits of open space.

Target Maintain the ratio of 7.3 acres of publicly accessible open space per 1,000 residents.

Short-Term Actions

- 4.2.1 By FY2023, protect and add open space through acquisition, preservation, and conservation as prescribed in the Open Space Master Plan (updated 2017) and by FY2023, evaluate increasing the target to 7.5 acres per 1,000 residents. This includes, by FY2020, City Council will re-establish the open space steering committee to re-assess the methodology, evaluate, and prioritize potential open space sites. Tools to be considered for open space preservation or restoration will include purchase, easements, or repurposing land as funds can be made available, development occurs, or partnerships can facilitate.

Cost Estimate: The proposed FY20-29 CIP provides \$13,175,000 for Open Space acquisition and development. Any proposed changes to this funding will be evaluated through the Open Space Steering Committee's action findings.

Cost Breakdown: The action is also dependent on the development envisioned in small area plans, including city investments, developer contributions, and private philanthropic contributions.

- 4.2.2 By FY2023, increase the percentage of acres of public natural lands that are actively managed, including restoration and invasive species removal, by 50 percent (450 acres).

Cost Estimate: Existing staff resources

- 4.2.3 By FY2020, evaluate and update, using a public process, the requirements of open space on residential, commercial and mixed-use private development. Issues to be addressed include how to achieve meaningful and publicly accessible open space, particularly at the ground level, how to value developer contributions to off-site open space, how to minimize impervious surfaces, how to align vegetation requirements with canopy and native species goals described in Chapter 4.A.1. above; and, how to ensure consistency of open space requirements across similar zones.

Cost Estimate: Existing staff resources

Mid-Term Actions

- 4.2.4 By FY2028, identify tools and techniques through stream valley plans to maintain and enhance all of the City's stream valleys including public access points for ecological and recreational benefits. The plans will be updated every 10 years.

Cost Estimate: \$250,000/10 years (new request)

Cost Breakdown: Based on previous similar plans. Note, however, that this does not include plan implementation which will be determined based on findings of the plan.

- 4.2.5 By FY2028, seek publicly accessible open space opportunities in unconventional spaces:

- a. Further evaluate the City's network of public alleys and define those most appropriate for informal recreational use and/or green infrastructure improvements.
- b. Work with Northern Virginia Conservation Trust to identify potential locations for conservations easements, particularly those that would connect or are adjacent to existing open spaces
- c. Identify and map opportunities to re-purpose public rights-of-way and parking lots for other public-serving uses, including interim and/or permanent recreational use and open space, affordable housing, schools, or other public facilities.

- d. Protect and preserve institutional open space by:
 - i. Pursuing easements for trails and/or ecosystem corridors through institutional space to connect with public open space
 - ii. Develop mechanisms, possibly including incentives and processes for public/private partnerships to maintain and enhance natural areas on institutional land.
- Cost Estimate:* \$60,000/year (part of approved CIP)
Cost Breakdown: The City currently holds a contract with Northern Virginia Conservation Trust to advise on open space concerns and these action items can be added to our joint work plan.

Mid-Term Actions

- 4.2.6 Findings of the Open Space and Private Development Study, an EAP short-term action scheduled for completion in June 2019, will inform EAP mid-term actions. The study includes an investigation into issues of visibility/accessibility of open space in private development, the provision of rooftop open space, impervious cover, and characteristics of successful open space.
- 4.2.7 As noted in the short-term action items, the City will establish an Open Space Steering Committee within the next year. The Committee will have a charge of work to re-assess the methodology, policies, and tools for evaluating future publicly accessible open space sites, whether through acquisition, easements, or development. Through this process, the work group will also evaluate the potential to increase the current open space ratio of 7.3 acres per 1,000 to 7.5 acres per 1,000. The findings of the Steering Committee will also direct Mid and Long-Term actions.

Long-term Action

- 4.2.8 Actions may be proposed as a result of the Open Space and Private Development Study in June 2019.

Justification

A healthy and diverse urban forest canopy coverage in Alexandria provides a broad range of environmental and social benefits such as reduced GHG emissions, improved air quality, enhanced property values, stormwater and flood mitigation, public health benefits, and vibrant public spaces. The reduction of GHG emissions improves air quality and contributes to health and wellness.

Legislative Priorities

Advocate for state legislation that would enable the City to expand tree protection and preservation and to increase tree canopy requirements.

Environmental Action Plan Phase 2
Green Building and Land Use and Open Space Chapters

Actions may be proposed as a result of the Open Space and Private Development Study in June 2019.

Accountable Parties

Recreation, Parks and Cultural Activities (primary); Planning and Zoning.

May 22, 2019

Re: AHAAC Comments on the Proposed 2019 Green Building Policy Update

The Alexandria Housing Affordability Advisory Committee (AHAAC) has been following the Green Building Task Force's work to review the City's Green Building Policy over the last several months as part of the Environmental Action Plan update. The affordable housing development community was represented specifically by a stakeholder on the Task Force that examined the proposed changes.

Overall, AHAAC is very supportive of the City's efforts to improve the efficiency of Alexandria's buildings. In many ways, the affordable housing development community has led the way in green building policy as all new construction affordable housing projects that have been built or planned over the last five years meet the criteria of the proposed policy update. However, there are two areas of concern to AHAAC regarding the proposed green building policy update. The first area involves the proposed requirement for renovation projects that require a development special use permit (DSUP) or development site plan (DSP) to achieve an Earthcraft Gold certification, and the second is the use of a bonus density program to encourage increased green building standards.

Existing multi-family housing, especially garden-style apartments, provides a significant source of affordable housing in the City of Alexandria. The requirement that renovations of existing stock achieve the same efficiency standards as new construction comes with substantial cost and difficulty, and almost guarantees that product will not remain affordable. In addition, it makes it more difficult for mission minded developers to acquire and renovate these buildings with the goal of permanent preservation of affordability. AHAAC acknowledges that limiting this requirement to projects that require a DSUP or DSP reduces the impact to projects that likely include affordable housing, however, we believe there is an opportunity the City should not miss to amend the policy to allow a project that provides a minimum amount of affordable housing to be exempt from this requirement to incentivize provision of affordable housing.

AHAAC's second area of concern pertains to the Policy's recommendation to evaluate in the mid term the use of bonus density in exchange for an increase in building efficiency. Virginia's enabling legislation strictly limits a local jurisdiction's ability to implement regulations that require the provision of affordable housing within new development. Due to these limitations, zoning tools like inclusionary zoning cannot be used in Alexandria. The provision of bonus density is the one zoning tool that allows Alexandria to require the provision of affordable housing. The Housing Master Plan made several recommendations to further encourage developers to take advantage of this tool and City Council has approved recommendations to enhance its use, the most recent of which increased the allowable density increase from 20 percent to 30 percent.

AHAAC's concern involves any policy change that allows developers to take advantage of bonus density in return for increasing the efficiency of their own asset while limiting the use of that density for the provision of affordable housing. While increased building efficiency is a desirable outcome, this policy will further dilute the effectiveness of Section 7-700 (the City's affordable housing bonus density and height tool). We have watched a similar concern become a reality in Old Town North as two developers

have opted to take advantage of the arts bonus density program in lieu of additional density yielding affordable housing. While the arts bonus density program impacts approximately 20 development sites in Old Town North, the current green building policy may have citywide applications.

The Green Building Task Force has acknowledged this concern and stated it does not desire to have the green building density bonus compete with bonus density currently allowed for affordable housing. As a compromise it has been suggested that developers be required to use all bonus density allowed under Section 7-700 before using any allowable further increase attributable to the green building policy. AHAAC believes this is a fair compromise, but questions have been raised as to whether the City can legally require a developer to use one program versus another. Therefore, AHAAC would recommend that the City delay implementing a green building bonus density program until an affirmative opinion that addresses these issues is provided.

Thank you again for the opportunity to provide comments and for your responsiveness to our concerns. We hope that we can continue to provide guidance on how new policies impact the provision of affordable housing.

Please feel free to contact me if AHAAC can assist you any further.

Sincerely,

/s/ Robyn J. Konkel

Robyn J. Konkel
AHAAC Chair