

Blockz



Block 4



### From Page 10 of the Strategy

The City's primary tool to incentivize affordable housing through the development process is Section 7-700 of the Zoning Ordinance, commonly referred to as the Bonus Density and Height Program. This zoning tool incentivizes the provision of low- and moderate-income housing in exchange for "bonus" (up to 30%) density and/or height (up to 25 feet) in new development, wherein at least one-third of the bonus approved must be affordable. In the case of The Heritage at Old Town and Olde Towne West III, the bonus density allowed through Section 7-700 under existing zoning is not sufficient to accommodate the density needed to retain the existing affordable housing units.

**Regulatory Tools** 

As is illustrated in Scenario #3, the only viable alternative is to grant the property owners additional density through a recommended rezoning, paired with some added height, to retain the committed affordable units without sacrificing project returns or high-quality design and other communityserving amenities. This would also minimize the need for City funding for housing at these sites, allowing scarce public resources to be invested in services and infrastructure that serve the community, and in expanding housing affordability and diversity in other parts of the city.

### C. paired with some added height

### <u>Affordable Housing Recommendation 2.1</u> Use additional density and height as a tool to incentivize the retention of all existing committed affordable units of which <u>140 units for the Heritage</u> are applicable here. <u>This height is the recommended building height limit in Table 1.</u>

Sec. 3-1407 – Height maximum permitted height of buildings shall be the height as depicted in the governing small area plan.

### EXPANDED FROM PARAGRAPHS

"... the bonus density allowed through <u>Section 7-700</u> under existing zoning is <u>not sufficient</u> to accommodate the density needed <u>to retain the existing</u> <u>affordable housing units</u>."

"The <u>only viable alternative</u> is to (A) grant the property owners additional density (B) through a recommended rezoning (C) paired with some added height <u>to retain the committed affordable housing units</u>"

### SOLUTION- (since Section 7-700 was not sufficient)

- A. grant the property owners additional density
- Sec 3-1406 FAR up to 3.0 where 1/3 of FAR are affordable units
- <u>Affordable Housing Recommendation 2.1</u> Use additional density and height as a tool to incentivize the retention of all existing committed affordable units of which 140 Heritage units are applicable here.
- <u>Planning and Land Use Recommendation 3.34</u> defined bonus density up to 3.0 FAR is limited to 140 Heritage units.
- **<u>B</u>**. through a recommended rezoning
- Residential Multifamily (RMF) zone sec. 3-1400
- <u>Sec. 3-1401</u> purpose preserves long term affordable housing
- <u>Affordable Housing Recommendation 2.2</u> Rezoned properties are also subject to all other recommendations of the Strategy.

# **Regulatory Tools to Retain Existing Affordable Housing with Bonus Density & Height**

RI	ECOMMENDATIONS	EXPANDED FROM RECMMENDATIONS
1997 - C.	URE REDEVELOPMENT OF THE HERITAGE AT OLD TOWN AND OLD INF WEST III: Use additional density and height as a tool to incentivize the retention of all existing 215 committed affordable units at The	<b>2.1</b> Use additional density and height as a tool to incentivize the retention of all existing committed affordable units of which 140 units for the Heritage are applicable here.
2.2	Heritage at Old Town and Olde Towne West III. Consider rezoning(s) for the affordable housing sites that	<b>2.2</b> Rezoned properties are also subject to all other recommendations of the Strategy.
	retain the recommended committed affordable housing upits. Rezoned properties are also subject to all other recommendations of the Strategy.	
CON	NCLUSIONS:	

- 2.1 defines the number of committed affordable units as 140 units at The Heritage to retain.
- 2.1 The tool of additional density and height applies to retaining 140 Heritage units, *no additional units*.

2

- 2.1 Additional density use is defined in **Planning and Land Use Recommendation 3.34**.
- 2.1 Additional height is the <u>recommended building height limit from 45 ft. to 55 ft. in Table 1.</u>

## Regulatory Tools to Retain Existing Affordable Housing with Bonus Density & Height

(Planning and Land Use Recommendation)

3.34 Create a new zone to implement the recommendations of the Strategy. The zone will be predominantly for residential uses; however, ground floor commercial uses supportive of the residential use, such as day care, as well as neighborhoodserving ground floor commercial and retail uses compatible with adjacent residential uses, will be encouraged. The additional floor area provided by the new zone is available to the affordable housing sites (1, 2, 3, 4, and 5) that provide the recommended committed affordable housing units. Additional EXPANDED FROM RECOMMENDATIONS

**3.34** Create a new zone to implement the recommendations of the Strategy.

**3.34** The additional FAR provided by the new zone is available to the affordable housing sites (1, 2 & 4) that provide *the recommended* committed affordable housing units.

# CONCLUSIONS:

- Section 3-1400 Residential Multifamily (RMF) zone is the new zone.
- <u>The recommended committed affordable units are defined as 140 existing units for The Heritage to</u> retain in Affordable Housing Recommendation 2.1.
- Section 3-1406 (B) FAR bonus density use is for retaining 140 Heritage units.
- The tool of additional density use applies to retaining 140 Heritage unit, per Affordable Housing Recommendation 2.1, <u>not</u> to additional affordable units in excess of 140.

### From Page 12 of the Strategy

### **EXPANDED FROM PARAGRAPH**

For planning purposes, based on previous projects as described, <u>it is anticipated that, on average, approximately</u> three additional units will be required to preserve each affordable unit in the South Patrick Street area, as illustrated below.

# HOW MANY UNITS ARE NEEDED TO RETAIN AFFORDABILITY?

The total number of units in the potential redevelopment sites will not be known until the projects are proposed for development review. Unit count for a project can vary as it is affected by many factors, such as unit size and number of bedrooms for each unit. Low income Housing Tax Credit requirements, or site constraints, to name a few. For planning purposes, based on previous projects as described, it is anticipated that, on average, approximately three additional units will be required to preserve each affordable unit in the South Patrick Street area, as illustrated below. The final number of units for each site could be higher or lower depending on project development factors and will be determined as part of the development review process subject to the constraints and requirements outlined above.

### EXPANDED FROM NOTE

Note: Estimated number of new units based on average ratio of market rate to affordable units.

**CONCLUSIONS:** <u>CAUs was fixed at 215</u>, of which 140 units are for the Heritage to retain, and <u>MRUs was the variable</u> based on the "average ratio of market rate to affordable units"



Note: Estimated number of new units is based on average ratio of market rate to affordable units. Final number of units will be determined as par of the development review process  $\frac{4}{3}$ 

From Page 29 of the Strategy





### ZONING

The existing coning for the potential redevelopment sites within the core area range from CL: Commercial Low, CSL: Commercial Service Low, and RB: Townhouse zone as shown in Table 1. The existing zoning is intended for auto-oriented uses on South Patrick Street and townhouses on the remainder of the sites.

To achieve the affordable housing objectives of the Strategy a new tone is recommended for the affordable housing sites (site 1, 2, 3, 4, and 5). Consistent with the objectives of the Housing Master Plan to expand options for affordable housing in the city, this new zone will become a new tool in the City's overail affordable housing program, in addition to the existing Sonus Density Program. The new zone will allow additional Floor Area Ratio (FAR) to incentivite retention of the existing Sonus Density Program. The new zone will allow additional Floor Area Ratio (FAR) to incentivite retention of the existing Sonus Density Program. The new zone will allow additions of this strategy, in addition, a recoming of the commercial sites (sites 5, 6, 7, and 8) on South Patrick Street is recommended to incentive redevelopment consistent with the intent of the Strategy. Figure 3.13 identifies parcels recommended for a new zone or rezoning. As shown in Table 1, the Strategy recommends A fAR between 20 – 3.0 for these sites. Later will be multi-family, townhouse, and neighborhood serving ground floor commercial uses that are compabile with the adjacent residential uses.

The additional floor area provided by the new zone is available to the affordable housing sites  $\{1, 2, 3, 4, \text{and}\ 5\}$  that provide the recommended committed affordable housing units. The additional flaor area provided by a rezoning is available to the commercial sites (5, 6, 7, and 8) that meet the intent of the Strategy. Rezoned properties are also subject to all other recommendations of the Strategy.

Further, this Strategy recommends that the Wilkes Street public open space be recored from R8 (Residential) to POS (Public Open Space) to ensure long term retention of this important public park.

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CONCLUSION: This is the intent of the Strategy.

### **EXPANDED FROM PARAGRAPH**

To achieve the affordable housing objectives of the Strategy, a new zone is recommended for the affordable housing sites (sites 1, 2, 3, 4, and 5). Consistent with the objectives of the Housing Master Plan to expand options for affordable housing in the city, this new zone will become a new tool in the City's overall affordable housing program, in addition to the existing Bonus Density Program. The new zone will allow additional Floor Area Ratio (FAR) to incentivize retention of the existing 215 affordable units, in a manner consistent with the recommendations of this Strategy.

	-TOM HINE STUDIE	SITE		The second second	STORE COMO		SECONDENDED	RECOMMENDED		1.	Figure 3.2 depicts sites where potential redevelopment	
LOCA	Sitts (1)	ADDRESS	PARCEL SIZE (2)	Emport Zone	Exercises Building House Loop	Elaynaut Lawa Una	PLOGR ABEA RATIO (PAR) (3)(5)	BUNDING Handert Linet (43(5)	RECOMMENDED		is projected to occur over the next 15 years. The Strategy accountedges that for various reasons some of these sites may not redevelop, however, in the event that they do, they are expected to comply with the site and design ecommendations of the Strates and apolicable normic recomments. Sites not	EXPANDED FROM TABLE
	1		S <del>4</del>	1.00040° v day	न			FT			located in the core area may propose redevelopment but will be subject to the recommendations of the Southwest Buildrant	5. Use of Section 7-700 will be
1	The Heritage at Old Town	900 Wolfe	80,349	RE	45'	Residential	3.0	45'-55'	Predominantly Residential		Small Area Plan and all applicable Joning and development approvals.	subject to <u>compliance with the</u>
2	The Heritage at Old Town	431 S Columbus	48,243	RC	62'	Residential	3.0	45'-55'	Predominantly Residential	ž.	The development parcel size is based on the City's Real Estate records, not on survey data. Parcel and building sizes may be adjusted based on future survey information	Strategy's [1] affordable housing,
3	Olde Towne West 11	500 S Alfred	55,084	RB	45'	Residential	3.0	45'-55'	Predominantly Residential	3.	FAR assumes future rezoning that meets the intent of the Strategy. The additional floor area provided by a new zone is evaluable to the attortable housing sites (1, 2, 3, 4, and 5) that	planning, and [2] land use
4	The Heritage at Old Town	5105 Patrick	78,566	<b>86</b>	45'	Residential	3.0	45'-55'	Predominantly Residential		provide the recommended committed affordable housing units. The additional floor area provided by a resoning is available to the commercial sites (5, 6, 7, and 8) that meet the intent of the strategy. All recover grogerities are also subject to all other	recommendations and [3] ensuring that the building scale is compatibl
\$	Olde Towne West III	601 S Alfred	40,407	RE	45'	Residentiat	a.c	45' 55'	Predominantly Residential	4.	recommendations of the Strategy. Building height bries are depicted in Figure 3.32, which reflect maximum height for different portions of the blocks. For areas	with the neighborhood and [4]
6	West Marine	601 S Patrick	33,561	ડઘ	50'	Commercial	2.0	45'-55'	Predominantly Residential		with a 55-fool height land, an increase of two feet may be permitted for architectural embellichments, if approved as part of the development review process.	intent of the Strategy. Use of
7	Old Town Windows and Doors	631 S Patrick	13,280	લ્પ	507	Commercial	2.0	45'	Predominantly Residential	5.	Use of Section 7-700 will be subject to compliance with the Strategy's atfordable housing, planning, and land use recommendations and ensuring that the building scale is compatible with the neighborhood and intent of the Strategy.	Section 7-700 for bonus density and/or height requires a special us
B	Speedway Gas Station	620 S Patrick	16,667	a	45	Commercial	2.0	45'	Predominantly Residential		Use of Section 7-700 for bonus density and/or height requires a aprecial use permit approval by City Council.	permit approval by City Council.
9	Liberty Gas Station	700 5 Patrick	20,308	¢r	45'	Commercial	2.0	45'	Predominantly Residential		03 - Planning, Land Use, & Design 31.	nied for the following reasons:

- Extra height for extra affordable units does not comply with Affordable Housing Recommendation 2.1 that defined committed affordable units as <u>140 The Heritage is to retain</u>.
- 2. Using FAR for extra affordable units does not comply with *Planning and Land Use Recommendation 3.34* that defined bonus density up to 3.0 FAR is limited to 140 Heritage units to retain.
- 3. Illustrations show building scale is not compatible with the neighborhood.
- 4. Using FAR for extra affordable units is <u>not compatible with the intent of the Strategy:</u> FAR is for 140 HUD units.

Applicant's Plan By Block By Floor HERITAGE PROJECT - UNITS ALLOCATED USING APPLICANT'S FLOOR PLANS					Regulatory Tools Applied for	Square Feet						
					SUP Request For Section 7-700 Bonus		Block 1	Block 2	Block 4	Total SF		
					Height and SUP Request for 3-1406(B) FAR	FAR by Right - SF						
					of 3.03	Floor 1	43,768	25,498	-	69,266		
	Units Block 1 Block 2 Block 4 Total Units				0.0100	Floor 2	18,863	25,489	41,747	86,099		
FAR by Right - Units			DIOCK 4		CONCLUSIONS:	(Block 1, 2nd)	fir allocated .	4527 SF)	27 SF)	155,365		
Floor 1	43	23	0	66	RMF zone Sec 3-1406 (A) & (B), & Ordinance	5165 Rec	ommen	dations	2.1 & 3	.34:		
Floor 2	24	29	45	98	(A) FAR by Right: .75 FAR by Right units = 164							
		164										
DIOCK 1, 2110		.4327 57	(A)									
Bonus FAF	R - Units				(C) The SUP request for Section 7-700 bonus	height sh	ould be	denied	and the	e SUP		
Floor 2	29			29	request for FAR of 3.03 should be denied. T	he applica	nt adde	d 7-700	bonus	height		
Floor 3	58	31	54	143	to RMF zone Sec. 3-1406(B) bonus density us	e for nond	omplyir	g units	in exce	ss of		
Floor 4	55	31	57	143	140 HUD units already preserved = 166 units							
Floor 5	27	1	57	84	<ul> <li>Affordable Housing Recommendation 2.1</li> </ul>		ommitte	d affor	dable u	nits to		
Floor 6			21	21	retain as 140 for The Heritage.							
Block 1, 2nd	flr allocoted	.5473 SF)	(B)	420	<ul> <li>Planning and Land Use Recommendation</li> </ul>	3 3/1 and	Table 1	note 3	dofinor	l honus		
(Block 4, 6th	fir allocated .	61765 SF)	(D)		-				uenneu	bonus		
	-				density up to 3.0 FAR is limited to 140 He	-				. <b>.</b>		
Excess Un	its, Density	& Height	- Units		<ul> <li>Per Table 1, note 5, request for Section 7-700 bonus height <u>does not comply</u> with</li> </ul>							
Floor 5		14		14	2.1 and 3.34. RMF zone 3-1406(B) bonus	-						
Floor 6	27	14	13	54	700 bonus height for units in excess of 14	0 Heritage	e units a	lready r	etained	l.		
Floor 7	23	10	34	67	<ul> <li>Per Table 1 note 5, building scale is not contact</li> </ul>	ompatible	with ne	ighborh	lood or	the		
Floor 8			31	31	intent of the Strategy.							
(Block 4, 6th fir allocated .3824 SF) (C) 166		166	<ul> <li>SUP of FAR 3.03 includes noncomplying u</li> </ul>	nits per R	ecomme	endation	12.1&	3.34				
					thus currently overstated.					7		
Total 286 152 312 750					thus currently overstated.							

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Why is the applicant's request for an addition of 55 units in noncompliance with 5165? This request does not comply with Ordinance 5165, Recommendations 2.1, 2.2, 3.1 and 3.34, Table 1, Table 1 notes 3 & 5, Sec 3-1401, Sec. 3-1406(B) and Sec. 3-1407 to name a few.

					Applicant's Plan By Block By Floor						
					HERITAC	DUSING					
	So	uare Fee	t		Units						
	Block 1	Block 2	Block 4	Total SF		Block 1	Block 2	Block 4	<b>Total Unit</b>		
FAR by Rig	ght - SF	,		T Date to	FAR by Right - Units						
Floor 1	43,768	25,498	-	69,266	Floor 1	43	23	0	66		
Floor 2	18,863	25,489	41,747	86,099	Floor 2	24	29	45	98		
Block 1, 2nd	fir allocated .	4527 SF)		155,365	(Block 1, 2nd	flr ollocated		164			
					Bonus FAF Floor 2	29			29		
					Floor 3	58	31	54	143		
					Floor 4	55	31	57	143		
	Unit Type A	Allocation	Summary	1	Floor 5	27		57	84		
Total By R	ight Units			164	Floor 6			21	21		
Bonus De	nsity - HUD	Units		140	(Block 1, 2nd	420					
Bonus De	nsity - Mark	et Rate U	nits	280	(Block 4, 6th						
Total Bon	us Density l	Units		420	]						
Total Unit	s			584	Total	236	<b>1</b> 14	234	584		
Alldat	a from appl	licants' site	e and floo	r plans					-		

# **Regulatory Tools Applied to the** Solution

Use the applicant's floor plans to allocate by block and by floor the FAR and Units. This illustrates, with existing height, the Strategy recommendations and objectives can be achieved within the RMF zone:

- preserving 140 affordable housing units (Recommendations 2.1 & 2.2, RMF Sec. 3-1401)
- adhering to building height maximums (Table 1, Table 1 note 3, Recommendations 2.1, 2.2, 3.1 and 3.34, RMF Sec. 3-1407)
- adhering to density use (Recommendations 2.1, 2.2, 3.1 & 3.34, Table 1 note 3, RMF Sec. 3-1406 (B))

Alexandria, Vireinia

Historic Alexandria Resources Commission 220 North Washington Street Alexandria, Virginia 22314-2521 (703) 746-4554



February 18, 2021

Mayor and City Council City of Alexandria

Re: Planning Commission Report 21-0731 Regarding DUSP #2020-10032 and Rezoning #2020-00006 – Heritage at Old Town

Dear Mayor Wilson and Members of Council:

The Historic Alexandria Resources Commission (HARC) is the city commission charged with advising and supporting the City Council, City Manager and city staff as to "the responsible stewardship of this unique, historic city," including through such means as "preserving the historic cultural diversity of the city," "developing our city in directions that do not threaten its historic integrity," "building a sense of community identity and continuity," and "preserving historic sites and buildings." Our interest thus extends to protection and preservation of Alexandria's historic resources throughout the city, including those within the Old and Historic Alexandria District.

The core public benefit to Alexandria from redevelopment of the Heritage at Old Town site is expected to be an addition to the City's stock of affordable housing, which has been declining at a disturbing rate for many years, and which presently falls far short of our residents' need. The principal private benefit would be a significant return to the developer.

HARC professes no special expertise as you weigh the proper balance between those public and private objectives, but urges that, as you do so, you also give serious attention and proper weight to the important public and private benefits which the city, its residents, property owners and visitors derive from its robust dedication to the preservation and employment of Alexandria's unique historical resources. The applicant stands to realize substantial return on this project. Under the current circumstances, it is important that the city redouble efforts to negotiate further concessions by the developer including (1) more affordable housing units and (2) fewer concessions by the city with respect to neighborhood impacts including variances from requirements designed to preserve the character of the Old and Historic Alexandria District and other issues described below.

In that context, HARC is concerned that the height, scale and mass of the new buildings as presently proposed for this site would far exceed that which is characteristic of the Old and Historic Alexandria District; that their architecture is starkly out of character with that of the nearby neighborhood, and of the Historic District generally; that the project would impair the

welcoming quality of an important gateway to the City and its Historic District; that it would damage the historic Bottoms neighborhood which surrounds the site; and that it could set a poor precedent for future development in the Historic District and beyond.

We understand that this project is scheduled for a public hearing at your meeting of February 20, 2021. We urge your awareness of and consideration of the following factors as you conduct that review.

### Impact on the Old and Historic Alexandria District (OHAD)

The current project contemplates construction of new buildings on three contiguous blocks within the Bottoms neighborhood in the "southwest quadrant" of Old Town. Although the project occupies only a small portion (2 blocks) of the OHAD (see attached map), the bulk of which extends north, east and south from this site, the entire project site is within or immediately adjacent to the OHAD. Whatever new construction takes place here will necessarily have impacts on that surrounding and adjacent Historic District.

HARC has great interest in the historic integrity of the Old and Historic Alexandria District, which is perhaps Alexandria's most widely known historic resource; which is of central importance to our city among such resources; and which is itself, in its entirety, a resource listed on the Virginia Landmarks Register and the National Register of Historic Places. The proposal contemplates new construction occupying almost the entire compass of these blocks, predominantly six or seven stories in height, in a neighborhood of predominantly two-story and three-story townhouses of modest scale. The architecture may be representative of modern commercial or multifamily residential buildings elsewhere in Northern Virginia in areas of little historical significance or distinction, but it is starkly different from that in the immediate neighborhood, and even, perhaps, from that most characteristic of the Old and Historic Alexandria District as a whole.

We are concerned that the height, mass, scale and architecture of the proposed project are entirely out of character with the predominant characteristics of the adjacent and broader OHAD, and that it could thus have a substantially negative impact on the historic integrity of that District.

The South Patrick Street Housing Affordability Strategy incorporated into the Southwest Quadrant Small Area Plan recommended that building heights be limited to 45 feet to 55 feet for different portions of the project area. The present project area is adjacent to and partially within the Old and Historic Alexandria District, where the predominant building height, particularly in the residential areas, is 50 feet or less. Going beyond those standards to permit heights up to 80 feet for the Heritage buildings would far exceed the height limit that has protected the Historic District since its inception, thus inviting egregious damage to the historic scale and character of the entire District in the future.

### Proximity to an Important Gateway to Alexandria

The project site is bounded on the west by South Patrick Street, which is the gateway to Old Town (and to the city generally) from U.S. Route 1 and Interstate 95, the principal highway arteries for north-south traffic on the east coast of the United States, and the first gateway for traffic from the north and east on Interstate 495, the Capital Beltway. The site's gateway location calls for great care and consideration of project impacts in keeping with the Historic District Ordinance's purpose

...to safeguard the city's portion of the George Washington Memorial Parkway and other significant routes of tourist access to the city's historic resources by assuring that development in and along those transportation arteries be in keeping with their historical, cultural and traditional setting. (Sec. 10-101(H). Emphasis added.)

HARC's concern derives from its charge to advise on "building Alexandria's national and international reputation as an attractive city" so as to "attract people...to Alexandria" and thus to "increase the contribution of tourism to city finances." (Sec. 2-4-32 (b) and (c)). **The siting of tall, massive buildings close to the property line along South Patrick Street would dramatically change the view from the Route 1 gateway** – currently lined with many tall, mature trees, and variegated low- to mid-rise buildings compatibly scaled with the historic setting, set far back from the roadway. The stark new design would stand in sharp contrast to the present view-scape and could create the effect of a multi-story "wall" instead of an inviting entry to the City and the adjacent historical neighborhood. The existing buildings and the character of this neighborhood are compatible with the City's historic, cultural and traditional setting; any new construction should respect those values as well.

### Impact on the Historic Bottoms Neighborhood

The Bottoms or the Dip was the first African American neighborhood in Alexandria, begun in the 19th century when several free blacks entered into long-term ground rent agreements on the 300 block of South Alfred Street, which became the nucleus of the neighborhood. The Bottoms is roughly bounded by Washington, Prince, Henry and Franklin Streets (see attached map); the current project site, outlined by Wolfe, Patrick, Gibbon, Alfred, Wilkes and Columbus Streets, is at the center of that historic neighborhood.

Too many of the original structures in the Bottoms have been lost, but many important historical structures remain. The present brick structure of the Alfred Street Baptist Church at 301 South Alfred Street (in the first block north of the current project site) was probably designed and built by free black craftsmen. Founded in 1803, the church is one of the oldest African American congregations in Alexandria, and is significant for its major religious, educational and cultural role in Alexandria's free black community prior to the Civil War. The Odd Fellows Hall at 411 South Columbus Street (adjacent to and in the same block as the project area) was a major gathering place for African American benevolent organizations following the Civil War, serving an important role in developing community identity, promotion of racial consciousness and

leadership skills. Dr. Albert Johnson, a graduate of the first black medical school, at Howard University, was the sole African American doctor practicing in Alexandria in 1900. His home (814 Duke Street, in the first block north of the project site) is significant in the historic context of residential development because it illustrates the range of professions and people who lived in the Bottoms. The Roberts Memorial United Methodist Church (606 South Washington Street, at the edge of the Bottoms neighborhood), built in 1834, is the oldest African American church building in Alexandria.

These four sites shown on the attached map – Alfred Street Baptist Church, Odd Fellows Hall, Dr. Albert Johnson House, and Roberts Memorial Church – are all listed both on the Virginia Landmarks Register and the National Register of Historic Places. These structures and a number of Bottoms townhouses still stand, one in the same block and others very nearby the current project site.

Among the Council's "Considerations on Review" is the question "whether the proposed use will result in the destruction, loss, or damage of any natural, scenic or historic feature of significance." (Section 11-504 (B) (13)) Construction of a new project of the height, mass and scale of that proposed, and of an architecture so starkly different from that of its surroundings, would have a detrimental impact on what remains of the historic Bottoms neighborhood in which it is centered.

### Precedent for Future Development in the Bottoms Neighborhood and Beyond

The current project contemplates new construction on three of the nine blocks in the neighborhood (seven blocks to the east and two blocks to the west of South Patrick Street) that have been identified as potential redevelopment sites. Two of those are partially or wholly within the OHAD; a third abuts those two but is outside the Historic District. The Council should consider the impacts not just within the boundaries of the present project, but within the context of the surrounding neighborhood, and the impact it might have on the larger Historic District.

Moreover, the 2018 South Patrick Street Housing Affordability Strategy states that any affordable housing initiative must **"ensure future development is not only compatible with the existing neighborhood, but enhances it."** The proposed densely packed massive buildings are much too large to complement the existing neighborhood. The proposal does not meet this standard of compatibility.

HARC urges your consideration that whatever judgments you reach now about the buildings to be constructed at the present site are very likely to be taken as precedent for what is now or later proposed for the other blocks that have been identified as potential redevelopment sites. If Council were now to judge buildings of the height, scale, mass and architectural character of those proposed here as appropriate for the Old and Historic District, it is likely that current and future proposals for buildings on other blocks within or very near the Old and Historic District, the Bottoms neighborhood, and the South Patrick Street gateway to the City, would follow suit.

Extension of that precedent to the remaining blocks could amplify any damage to the Bottoms, the OHAD, and the gateway.

\* \* \*

Finally, HARC asks the City Council to value and protect the character of the Old and Historic Alexandria District and the City's other historic resources within and outside the District, as you weigh all of the public and private benefits that will appropriately inform your evaluation and decision on this proposal. Further negotiation with the developer to increase the affordable housing component and to decrease impacts on the surrounding neighborhood would be appropriate.

As always, HARC is available to help and support this effort in any way it can.

Sincerely,

Danny Smith and Linda Lovell, Co-Chairs HISTORIC ALEXANDRIA RESOURCES COMMISSION





February 20, 2021

Subject: OTCA Comments in opposition to Docket Item #10, REZ#2020-0006, DSUP#2020-10032, TMP#2020-00084 for Heritage apartments demolition and Concept Plan proposal

Dear Mayor Wilson and Members of the City Council:

My name is Steve Milone, I am the President of the Old Town Civic Association, and resident for over 20 years at 907 Prince Street, two blocks north of the Heritage apartments.

The issue of affordable housing being retained or expanded at the Heritage site is not a yes or no question. We all want affordable housing. We neighbors strongly favor the retention of affordable housing on the Heritage blocks, and elsewhere in our neighborhood, where we have a large number of affordable rentals located already throughout the southwest quadrant Old Town.

The proposed Heritage development fails to meet basic provisions of Zoning; Special Use Permit review criteria for use of bonus density and height; the Old and Historic District Design Guidelines; and notably the heights listed in the South Patrick Street Housing Affordability Strategy update to the Master Plan that the Council approved in 2018.

The current Heritage redevelopment proposal to construct large, seven story apartment buildings that nearly cover all three of these blocks, is drastically out of scale with the surrounding Old Town neighborhood that on all surrounding streets, including along South Patrick Street, consist entirely of 2 story and 3 story residential townhouses, and fails to be compatible with the height, mass, scale and character of the neighborhood and the Old and Historic Alexandria District.

The building heights listed in the approved South Patrick Street Housing Affordability Strategy (SPSHAS), that was updated through a detailed six month planning process and charrette, clearly and explicitly calls for heights of 45 feet in the historic district, with transitions to 35 feet along the north side of Block 2 to transition to the 25 foot tall townhouses on the 800 block of Wolfe Street and the 400 block of S. Columbus Street. Page 27 of the Strategy adds - "This Strategy recommends an increase to 55 feet on a limited number of blocks primarily along South Patrick Street," not to 80 feet heights proposed by the applicant.

One exception noted in the Strategy to the 45 and 55 foot building heights in the approved plan is for the existing 62 foot mid-rise building on the south side of Block 2 that is a noncomplying structure because it exceeds the height limit of 50 feet for the Old and Historic District in which it is located. According to Zoning Ordinance Section 12-102(B) –"If a noncomplying structure is...demolished..." as proposed by the applicant "...it may be reconstructed provided that there is no increase in the floor area ratio, density, height or degree of noncompliance which existed prior to such destruction." The Bonus height that the application depicts on Block 2 is not allowed per Zoning Ordinance Section 12-102(B) that prohibits an increase in height of the noncomplying midrise, and also prohibited by Zoning Ordinance Section 7-700 that states in Section 7-703(B) "...no building located in any ...height district

where the maximum allowable height is 50 feet or less" as is the case here in the Old and Historic District Height District "may be allowed to exceed such height limits."

The height proposed here is the same as the height of the King Street Metrorail Station Height Zone even though this site is more than a mile walk from the Metro Station. It is also the same height as the development approved in January 2021 for 727 N. West Street which is located immediately adjacent to the Braddock Metro Station, but is much larger at about four times the footprint on each of the blocks.

The 555 market rate units being proposed here form 75 percent of the development, in addition to the 25 percent or 195 affordable housing units. We do not oppose the entire development being affordable housing, but the development needs to be reduced in height to meet all of the Zoning Ordinance requirements including the heights in the South Patrick Street Housing Affordability Strategy, and to be compatible with the Old and Historic District Guidelines. Staff has boasted that this development provides 195 affordable housing units without a cent of public dollars that would normally require millions of City dollars for such affordable housing. However, we would suggest that perhaps this is a site where some City dollars could be contributed to increase the number of affordable units while constructing a development at reduced height and scale that are compatible with the neighboring properties, the Old and Historic District Guidelines and to create the South Patrick Street gateway to the City and the Historic District that is so beneficial to the City.

Why is the City requiring only a 40 year commitment on the affordable units? Such a limit is what brought us to this day following expiration of the Dip Urban Renewal project affordability requirement. I suggest the Council eliminate the 40 year limit to the affordability of the units.

SPSHAS states "Importantly, this Strategy balances the need for redevelopment with responsible design and height recommendations to ensure future redevelopment is not only compatible with the existing neighborhood, but also enhances it."

The proposed three block Heritage redevelopment is not compatible with the existing development and does not enhance it as required by the SPSHAS, but DOMINATES the neighborhood in violation of the criteria for SUP approval to employ the Bonus height provisions of the Section 7-700.

We love our neighbors at the Heritage who we do worry will be negatively affected by the proposed redevelopment, their relocation, and diminishment of their quality of life as they lose approximately an acre of high quality private ground level open spaces spread across the three blocks including large landscaped areas with mature trees for passive recreation, a fenced dog exercise area, and a children's play area in the interior of Block 1 with climbing equipment and pathways that are full every day with children biking and running in the protective privacy and easy view of their parents from their existing homes.

Historic maps of these blocks show the Village AME Church, and historic black owned townhouses located on parts of block 4, as well as the now presumably buried Tanyard ditch

(stream) and buildings that supported the railroad that had existed on Blocks 1 and 2. These historic structures and the historic development of the site seem not to have been considered at all in crafting the proposed development.

The Urban Renewal projects of the mid-20<sup>th</sup> century, like 1960s and 70s DIP project in the Bottoms, that demolished the historic community that occupied these blocks was tragic. Is this project just a more modern version of the tragic urban renewal policies of the 20th century? I worry that this project will be another form of gentrification. The project will break up the community at the Heritage that has been in place since the 1970's and we can expect will bring mostly white, wealthy people to live in the market rate units, decreasing the diversity of the neighborhood, similar to changes that we have witnessed in the Parker-Gray district, where the Black population decreased from 90% in 1980 to 15% in recent figures, even lower if public housing population is excluded.

I ask that Council consider mandating the following traffic and parking improvements to the site plan:

- Eliminate the garage entrance on S. Alfred St to Block 2 which violates Zoning Ordinance Section 8-200 that states "Within the Old and Historic Alexandria District, access to all parking shall be provided from an alley or interior court."
- Close Wolf Street at S. Alfred St and re-open Wolfe Street to S. Patrick Street so that the traffic from the Block 1 comes and goes from S. Patrick Street

Taken together these changes to the proposed traffic flow from this development will be shared on all three surrounding north-south streets, S. Columbus, S. Alfred, and S. Patrick, rather than all traffic connecting to S. Alfred Street.

I also ask the Council to direct staff to take efforts in the final site plan development process to maximize on-street parking.

We ask that you deny the current proposal with direction to the developer to revise the project to meet the non-complying structure height limitation of Zoning Ordinance Section 12-102(B), and for the developer to work with the BAR and staff to bring the development into compatibility with the heights in the South Patrick Street Housing Affordability Strategy, with the Old and Historic District Guidelines, and to not dominate the adjacent and surrounding 2-3 story uses.

Sincerely,

Stephen Milone President, Old Town Civic Association