

Wednesday, September 8, 2021

*Via email:*

The Planning Commission of the City of Alexandria  
PlanComm@alexandriava.gov



Dear Members of the Planning Commission of the City of Alexandria,

As you likely know, Tenants and Workers United (TWU) is a registered 501(c)(3) nonprofit organization that works with and organizes low-income communities of color, primarily immigrants, across Northern Virginia. We have a long 35-year history working with the Arlandria community in Alexandria City. We trust that you are aware of the longstanding – now exacerbated – housing crisis which threatens to displace our community en masse. Historically and currently, our community faces oppression, systemic racism, and economic challenges that make securing stable, dignified, affordable housing exceptionally difficult. We look to you, as housing leaders, to ensure that *everyone*, including our community, can afford to remain in the city they call ‘home.’ Not only is this our plea, but it is your legal responsibility.

While we appreciate the City’s efforts to involve our community in the Small Area Plan process, the Plan falls short of our community’s needs. Throughout the process, we have consistently raised the fact that the greatest community need is for housing that is affordable for people earning up to 30 and 40 percent of the area median income (AMI). Given the City’s objectives and openness to community feedback, we are deeply disappointed to see that the proposed Plan is not the expansive and comprehensive public action our community needs. The City can, and must, do more to secure the future of our vibrant Chirilagua community. Under the Fair Housing Act, the City must take meaningful action to protect its Latinx residents from displacement. We invite you to consider our reflections on the proposed Plan.

Affordable housing is the top issue facing low-income households in Alexandria, and the need is especially acute for families at or below 30% of the area median income (AMI).<sup>1</sup> According to a survey we conducted in 2019, two-thirds of Arlandria-Chirilagua respondents make less than 30% of AMI, and fully ninety-five percent earn less than 40 percent of AMI.<sup>2</sup> Arlandria-Chirilagua residents are overwhelmingly Latinx,<sup>3</sup> and a lack of quality affordable housing in our community is one way we experience systemic racism. This need has been exacerbated by the Covid-19 pandemic. Since Amazon announced the arrival of its second headquarters just a mile away, development pressure has only increased, incentivizing development that is unaffordable for our community.

---

<sup>1</sup> The Economic Opportunities Commission Alexandria Community Needs Assessment, 2019, at 6-7, available at: [https://www.alexandriava.gov/uploadedFiles/dchs/WebBoxes/EOCNeedsAssessmentReport2019\\_v2.pdf](https://www.alexandriava.gov/uploadedFiles/dchs/WebBoxes/EOCNeedsAssessmentReport2019_v2.pdf).

<sup>2</sup> Arlandria Income and Population Survey and Findings, July 2019, at 4, available at: <https://d3n8a8pro7vnm.cloudfront.net/newvirginiamajority/pages/152/attachments/original/1563402865/FinalArlandriaAmazonHousingReport.pdf?1563402865>

<sup>3</sup> Id.



Lack of affordable housing has created an eviction and displacement crisis.<sup>4</sup> The best way to address this crisis is to create and preserve stable, quality housing that our community can afford. The Small Area Plan recognizes this: combating displacement is one of its main objectives,<sup>5</sup> but the proposed Plan falls short. The Small Area Plan is the City's last opportunity to create a comprehensive strategy to protect our neighborhood and community. The City's concrete action is critical.

First, the City should utilize its proposed density bonus policy to only approve special use permits if developers will make 30% of their units affordable between 30 and 40% AMI. The City is proposing that 10% of new development (above the 2003 SAP) must be affordable at 40% and 50% AMI. Yet, although the City recognizes that Arlandria-Chirilagua is most acutely and direly in need of deeply affordable housing, this policy barely differs from the current Arlandria and city-wide policies. A developer in Arlandria already must provide 8% of new development at 60% AMI (could be increased to 10% with re-classification). This incremental increase from current policy is deeply inadequate to meet Arlandria-Chirilagua's unique need.

As the Mt. Vernon Village development progresses, we can see how this falls short in practice. This development proposes 588 units, and under the current Small Area Plan, only 10 will be affordable to the community (30 will be affordable at 60% AMI). This is a wake-up call. We must assure that a higher amount of the increased density is accessible to current residents, or any new development will only further gentrify the area.

Second, the City should provide more specifics about City investment to create new and preserve existing affordable housing in Arlandria. The City has proposed broad goals of leveraging resources, buying down rents, and developing financial incentives. In our April 14, 2021 letter, we requested that the City specify a dollar amount that will be designated directly to Arlandria for new developments, clarify the City's plan for rental subsidies, and show how it will explore diverse tools for affordable housing (such as public housing, vouchers, community land trusts, and cooperatives). To date, the City has not presented concrete plans on these points. To assure deeply affordable housing, the City must make and follow up on real commitments to invest.

The City has a duty to do all that it can to protect long-time Latinx residents and the cultural diversity of the Arlandria neighborhood. The City has recognized the systemic racism in the housing system and its duty to protect its communities from racial inequities.<sup>6</sup> Furthermore, under the Fair Housing Act (FHA), the City is compelled to affirmatively further fair housing. This means that the City must take meaningful actions to "address significant disparities in

---

<sup>4</sup> The Economic Opportunities Commission Alexandria Community Needs Assessment, 2019, at 2, 4.

<sup>5</sup> Arlandria Small Area Plan Presentation, June 22, 2021, available at:

<https://www.alexandriava.gov/uploadedFiles/planning/info/ArlandriaVirtualCommunityMeetingENG062221.pdf>

<sup>6</sup> City Council of Alexandria, Resolution No. 2950, June 9, 2020, available at:

<https://www.alexandriava.gov/uploadedFiles/police/info/ResolutionNo2950CondemningRacism.pdf>



housing needs and in access to opportunity,” and transform “racially or ethnically concentrated areas of poverty into areas of opportunity.”<sup>7</sup> The City fails to meet its FHA obligations when it does not preserve existing affordable housing and allows the mass displacement of Latinx residents. Taking meaningful action to combat displacement of Latinx residents, therefore, must be a top priority for Alexandria to meet its FHA obligations.

We appreciate the City’s sincere commitment to shaping the Small Area Plan to reflect community needs and priorities.

Sincerely,

Evelin Urrutia  
Executive Director, Tenants and Workers United  
[errrutia@tenatnsaandworkers.org](mailto:errrutia@tenatnsaandworkers.org)

CC: Helen McIlvaine, Director of Housing ([Helen.McIlvaine@alexandriava.gov](mailto:Helen.McIlvaine@alexandriava.gov))  
Mark Jinks, City Manager ([Mark.Jinks@alexandriava.gov](mailto:Mark.Jinks@alexandriava.gov))  
Justin Wilson, Mayor ([Justin.Wilson@alexandriava.gov](mailto:Justin.Wilson@alexandriava.gov))  
Elizabeth Bennett-Parker, Vice Mayor ([Elizabeth.Bennettparker@alexandriava.gov](mailto:Elizabeth.Bennettparker@alexandriava.gov))  
Mo Seifeldein, Councilmember ([Mo.Seifeldein@alexandriava.gov](mailto:Mo.Seifeldein@alexandriava.gov))  
Canek Aguirre, Councilmember ([Canek.Aguirre@alexandriava.gov](mailto:Canek.Aguirre@alexandriava.gov))  
Amy Jackson, Councilmember ([Amy.Jackson@alexandriava.gov](mailto:Amy.Jackson@alexandriava.gov))  
Redella Pepper, Councilmember ([Del.Pepper@alexandriava.gov](mailto:Del.Pepper@alexandriava.gov))  
John Chapman, Councilmember ([John.Taylor.Chapman@alexandriava.gov](mailto:John.Taylor.Chapman@alexandriava.gov))

---

<sup>7</sup> Department of Housing and Urban Development: Office of Fair Housing and Equal Opportunity, Frequently Asked Questions: Interim Final Rule: Restoring Affirmatively Furthering Fair Housing Definitions and Certifications, July 14, 2021, at 5, available at: [https://www.hud.gov/sites/dfiles/FHEO/images/Frequently\\_Asked\\_Questions\\_7\\_14-21.pdf](https://www.hud.gov/sites/dfiles/FHEO/images/Frequently_Asked_Questions_7_14-21.pdf).



LEARNING TOGETHER TO  
LOVE OUR NEIGHBORS AS OURSELVES

Casa Chirilagua  
4109 Mount Vernon Ave.  
Alexandria, VA 22305

September 9, 2021

Planning Commission  
City of Alexandria  
301 King St.  
Alexandria, VA 22314

To the Members of the Planning Commission of the City of Alexandria,

Casa Chirilagua is submitting this letter to express our deep concerns regarding the currently proposed in the Draft Arlandria Chirilagua Plan. This neighborhood is an incredible asset to the City of Alexandria. The changes that are coming to our city through Amazon's H2Q, the Virginia Tech Campus, and the proposals of new developers will negatively affect thousands of Latino families living in the Arlandria Chirilagua neighborhood if the recommendations of this plan are not adjusted to be more equitable and to prioritize the needs of current residents rather than future ones and developers. Our concerns are outlined below:

According to the existing rights for developers, the City of Alexandria already allows for housing developments to designate 8% of units towards affordable housing. Department of Planning and Zoning's Draft Arlandria Chirilagua Plan proposes for new housing developments to designate an additional 10% of units towards affordable housing should a housing development build beyond the current height limit. First, the affordable housing units in the allotted height are reserved for tenants who make 60% of the AMI level. Seventy percent of families who currently reside in Arlandria Chirilagua, the demographic we work closely with, do not make 60% of the AMI. For these families to afford to live in any new housing units, they would have to be made available at 30% to 40% AMI. While the units added beyond the allotted height would have 10% of units being deeply affordable at 50% to 40% AMI, this translates to an exceptionally low number of units for a large number of residents that would need access to them.

Secondly, a 10% trade-off of deeply affordable housing units for 90% of units to be offered at market rate will increase Arlandria Chirilagua's AMI and is not an equitable trade-off. How does only offering 10% of 'deeply affordable housing' at 40% to 50% AMI align with the City of Alexandria's initiative: ALL Alexandria - Achieving Racial and Social Equity *"Working toward a world where we are all embraced for who we are, and are able to thrive to reach our highest potential. Removing barriers to full participation and belonging in life and culture. Equity means promoting just and fair inclusion throughout our city, and creating the conditions in which everyone can participate, prosper, and reach their full potential."*? This plan does not align with Alexandria's commitment to equity. The prioritization of the needs of current residents, not potential developers, or future residents, needs to be the explicit goal and purpose of this plan.



LEARNING TOGETHER TO  
LOVE OUR NEIGHBORS AS OURSELVES

Thirdly, allowing for the construction of taller buildings in a small and diverse neighborhood such as Arlandria Chirilagua will negatively impact the fabric and landscape of the community. If any new development is approved it would be better (however still not affordable to many in our community members) for the City to allow for builders to “build by rights”, restricting builders from constructing taller buildings and designating their required 8% of units as ‘affordable’ housing. We recommend including in the plan a restriction of taller buildings and having no net loss of affordable units at and below 40% AMI. If Alexandria is dedicated to preserving diverse communities such as Arlandria Chirilagua, it behooves the city to restrict development companies from constructing taller buildings and offering truly affordable housing at and below 40% AMI.

If the plan goes through as is, the Arlandria Chirilagua neighborhood will be an ideal location not only for new development but for the redevelopment of current residence buildings. There are few protections that would prevent current residents from eventually being priced out of their homes should properties like Presidential Greens or Eaton Square choose to redevelop. The plan should include specific guidelines and conditions under which property holders would be allowed to redevelop in the neighborhood. Items such as caps on rent increases, written prioritization of improved units for existing tenants, and written commitments on maintenance and upkeep should be requirements if existing properties are to be redeveloped. The plan should additionally include no net loss of affordable housing units, an increase in units at and below 40% AMI, and funding streams that current residents would have access to, should they require a subsidy to make the rent on the new home.

Planning meetings have also mentioned efforts to help increase homeownership amongst neighbors in Arlandria Chirilagua through tools such as finance classes, home ownership workshops, and more. The plan should include these tangible, specific examples backed by committed funding and explicit goals of how the city will support current residents of Arlandria Chirilagua to access new and redeveloped housing. Without the commitment of funding and written goals drafted alongside community members, these promises to support home ownership fall flat and lack accountability structures.

Casa Chirilagua has been building relationships with families for almost 15 years. Many of the families whom we’ve known and who have contributed to our community as leaders have since moved away due to displacement and gentrification and now reside in places such as Oxon Hill, Md. Arlandria Chirilagua isn’t simply a diverse community which the City of Alexandria needs to preserve, it is a community whose residents have incredible assets. Some of these assets include resilience, ingenuity, leadership, and entrepreneurship. Imagine how much more impactful Alexandria can be if instead of displacing residents who have powerful assets it chooses to invest in communities like Arlandria Chirilagua who have much to offer. The City of Alexandria will be at a significant loss if families and individuals continue to be displaced through the approval of the current Draft Arlandria Chirilagua Plan.

On behalf of the community and staff of Casa Chirilagua,

Adriana Gómez Schellhaas  
Executive Director, Casa Chirilagua