

July 19, 2024

Planning Commission Alexandria City Council City of Alexandria 301 King Street Alexandria, VA 22314

Attn: Christian Brandt

Subject: Alexandria West Small Area Plan

Alexandria Families for Safe Streets (AFSS) supports the Alexandria West Small Area Plan mobility goals. The Plan prioritizes the safety of pedestrians, cyclists, and drivers in traveling. It also provides for greater access and connectivity for all modes of travel, including significant public transit access and bicycle access throughout the community. Committing to planned off-road multiuse paths in figure 4.6 for Beauregard, King Street, Seminary, and Sanger will help keep bicyclists and pedestrians safe, and support those trips throughout Alexandria West. Expressly incorporating the safety and access of walkers, bicyclists, and transit-riders is a positive step forward in achieving a more inclusive and accessible neighborhood.

AFSS believes, however, that the City of Alexandria can accomplish more in this long-term plan to ensure the safety and access of all road users traveling in the Alexandria West area. First, AFSS urges the City of Alexandria to more strongly commit to public transit access in its redesign of roadways. Second, we urge the City to commit to dedicated cycle infrastructure and avoid the use of sharrows. Third, we urge the City to ensure that all areas within the neighborhood are well-connected for all multimodal travelers.

1. Transit Redesign: Transit support is crucial for the safety and convenience of all travelers in Alexandria West. The Plan envisions a transit hub at Southern Towers with access to bus routes on King Street, Beauregard, and Seminary Road. The Plan also includes a new bus rapid transit (BRT) corridor up King Street. Expanding transit to provide greater opportunities and access for residents is a great way to address climate change and improve the safety and travelers within the region. Building the infrastructure to support transit access also usually includes safety and comfort improvements for pedestrians and bikers in the area. AFSS supports this vision of expanded transit in the Alexandria Plan.

AFSS urges the City to commit to dedicated bus lanes for all the major transit corridors in the Plan. A reliable transportation system dependably provides users with a consistent range of predictable travel times. As drafted, the Plan commits



to a dedicated transit lane only along a segment of Beauregard. Generally the Plan only commits to study and address mobility-related issues at the intersections and along the corridors identified in Figure 4.9. AFSS urges the City to include an initial vision of dedicated bus lanes on identified public transit corridors. More fully committing to these enhancements is consistent with the Plan's goals to enable individuals of all ages and abilities to more safely navigate within AlexWest and establish stronger connections to both the rest of the City and the wider region.

2. Bicycle Safety: AFSS supports the expansion of off-road multiuse paths and protected bicycle facilities in Figure 4.6. These two trail types constitute the majority of the planned trails for bicyclists and scooters throughout the neighborhoods.

However, AFSS urges the City to avoid the use of any sharrows in the AlexWest Plan. Research demonstrates that sharrows are ineffective at improving cyclist safety. In fact some results suggest that not only are sharrows not as safe as bike lanes, but they could be more dangerous than doing nothing at all. Use of sharrows is inconsistent with access for cyclists of all ages and abilities in the Alexandria Mobility Plan. Especially in a long-term Plan like AlexWest, the City should commit to safe bicycle infrastructure that moves bicyclists from the streets into their own designated corridors. AFSS urges the City to avoid the use of sharrows along Braddock, which forms an important connection for cyclists between Dawes and Beauregard.

3. Neighborhood Connectivity: For pedestrians and cyclists, safe and comfortable connections are important to support daily trips and errands. The Plan recommends new and improved connections between neighborhoods that will promote safe and comfortable travel by foot. AFSS supports the Plan's commitment to connections for walkers. Walking takes longer than traveling by car, and extended detours due to connection issues discourages people from walking to their destinations rather than driving.

However, access across Holmes Run remains poor in the Plan, with only two crossings planned for the neighborhoods. Individuals at Chambliss Avenue or North Armistead will need to detour to North Beauregard to access the park or the rest of the neighborhood. AFSS urges the City to add additional pedestrian and bicycle crossings that will support access for pedestrians and bikers between the neighborhoods and parks from Chambliss and Armistead. This will also help support access to the Park, which is largely not realized on the west despite Figure 5.2 indicating that these neighborhoods are within a 5 minute walk. Currently such access is illusory, since any walker must detour blocks to access the trails and parks along Holmes Run.



In conclusion, AFSS appreciates the opportunity to comment on the Alexandria West Plan. We believe that the Plan offers an opportunity to improve the safety and access for residents of Alexandria West, and that many of the concepts and commitments in the Plan will improve safety and provide more access for residents of Alexandria West. The Plan envisions broader access to public transit, an expanded bicycle trail, and safe and convenient access to the neighborhoods of AlexWest. Given the goals in this Plan and the Alexandria Mobility Plan, AFSS urges the City to commit now to dedicated public transit infrastructure on its main transit corridors, avoid the use of Sharrows, and connect pedestrians and bikers across Holmes Run. AFSS believes that doing these things will improve access to reliable transit, improve the safety of cyclists and scooter-users, and encourage safe and comfortable walking in the AlexWest neighborhoods.

Sincerely,
Dane Lauritzen,
AFSS Board Member
On behalf of the Board of Directors - AFSS

From: YIMBYs of Northern Virginia, Alexandria Chapter

Re: Alexandria West Draft Recommendations



The Alexandria West Draft Plan should allow affordable housing everywhere, and maximize housing supply near transit and amenities.

We appreciate the hard work staff has put into engaging the community as they develop this vision for the future of Alexandria West. Through consistent community engagement, focusing on vulnerable communities and the needs of both current and future residents, staff have produced a draft plan that will deliver significant improvements in the Plan Area. The vision of building atop existing surface parking and in commercial areas, and requiring 10% of units above the base density to be committed affordable, is a step in the right direction and will allow for more desperately-needed homes. We appreciate the attention to multimodal transportation networks, expanded and connected parks, and accessible neighborhood amenities.

The draft plan envisions a wonderful neighborhood, for those who can afford to stay in Alexandria West. Unfortunately, Alexandria West is in the beginning stages of a displacement crisis. As older buildings near the ends of their useful lives - as seen already in the unsafe and unhealthy conditions faced by many residents of Southern Towers - we are staring down a real emergency. Alexandrians earning at or below 40% AMI face the brunt of this crisis.

This plan is envisioned to last for the next 15-20 years, likely longer than many of these buildings can remain in place without redevelopment or significant renovation. To avert massive displacement, this plan must create space for a large increase in housing supply, including dedicated affordable housing. These new homes must be in place and ready for occupancy very soon, if they're to be ready to absorb our neighbors who may soon need to leave buildings like Southern Towers.

In our view, the Draft Plan falls short of the urgent action needed to avert the crisis in a few ways:

The Draft Plan takes large swaths of Plan Area off the table for affordable housing construction. With a few exceptions "Area 3" covers Alexandria West's lowest density and wealthiest neighborhoods, sheltering them from meaningful growth. Heights in these areas are capped at 45 or even 35 feet: enough for a townhome or single family home but not much more, and certainly not enough for any building that includes dedicated affordable units. In fact the city's "bonus height" provision doesn't even apply to these areas, only coming into play for areas where heights of at least 50 feet are allowed. We can't afford to prioritize the aesthetic preferences of low-density neighborhoods if we want to avert serious displacement. The 10% affordability requirement in this Plan won't apply to most of Area 3, because there is no allowed increase in height or density from which the City can extract 10% affordability.

- Even in the core "target area" and along the planned West End Transitway, allowed heights and densities in some areas are insufficient - in some cases less than what already exists there today.
- The plan's vision of building on surface lots and in commercial areas is admirable, but we question its feasibility given current parking mandates. To replace existing parking on the lots where these homes are envisioned, projects would need to build expensive parking garages that can quickly make the new projects unaffordable or infeasible.

To improve the Plan and avert a displacement crisis in the next two decades, we recommend the following changes:

- Remove Area 3: Area 3 appears to largely shelter wealthier, lower-density neighborhoods from any growth, preventing them from contributing to housing affordability in any meaningful way. Despite parts of Area 3 being adjacent to high-amenity commercial areas in both Alexandria and neighboring jurisdictions, this plan prevents any growth beyond what's allowed by the current zoning code. The low height limits used in this area ensure that some of our best tools for creating affordable homes are unavailable. Low-density neighborhoods in Area 3 should be incorporated into Area 2, with increases in height and FAR to match this new classification, to open the full Plan Area to new and affordable housing.
- Increase baseline height to 85 feet: The Draft Plan mentions that very large buildings are unlikely to pencil out in Alexandria West for the near future. If this is the case, we should be maximizing the area in which smaller mid rise buildings can be constructed. 85-foot height limits are enough to enable construction of buildings short enough to rely on relatively inexpensive materials but large enough to add significant housing supply, including affordable housing. It would also ensure the universal applicability of the Bonus Height rule, which is only allowed where heights of at least 50 feet are allowed, and of the 10% affordability requirement.
- Transit-adjacent land should maximize allowed height and density: All land adjacent to the Alexandria West Transitway should allow the tallest buildings envisioned by the plan, with 150 feet of baseline height. This will allow the City to maximize return on its investment in the Transitway, while also adding as much housing as possible.
- Existing heights should be legalized: Many of the Plan's neighborhoods have height limits that are significantly lower than existing buildings in the neighborhood. For example, the Hilton is 338 feet tall, but the Plan imposes a height limit of only 100 feet on the parcel where the Hilton is located! If we must defer to the character of low-density neighborhoods in Area 3, The Plan should at least respect high-density neighborhood character as well by ensuring that height limits are at least as tall as existing buildings. If this requires Council creating a new Zone that allows more height, the Plan should recommend Council do so.

One might reason that these larger buildings will be infeasible in the Plan Area under current conditions. Infeasibility is not a good reason to outlaw something. Conditions change, and we can't predict what the housing economy of 2044 will look like. There is no harm done by

legalizing taller or more dense construction, even if homebuilders are unlikely to utilize the full extent of what's legal.

What we do know is the residents of Alexandria West are already facing displacement, and this will only get worse without a large influx of housing supply. If the city wants to avert a displacement crisis tomorrow, we need bold action today.

About Organization: YIMBYs (yes in my backyard) of Northern Virginia is a grassroots, all-volunteer organization working to make housing affordable to all by enabling the construction of more homes for more people. Attainable homes close to the amenities of daily life hold the promise of communities that are more affordable, socially connected, economically productive, and sustainable.

www.yimbysofnova.org



July 22, 2024

Mr. Jeff Farner
Deputy Director, Department of Planning and Zoning
Ms. Carrie Beach
Division Chief, Neighborhood Planning and Community Development
301 King Street Suite 2100
Alexandria, VA 22314

RE: Alexandria West Planning (AlexWest) June 2024 Draft SAP

Dear Mr. Farner and Ms. Beach:

We are grateful for the generous amount of time the City of Alexandria staff has provided our community through small group meetings, email exchanges, and community presentations. It is acknowledged and appreciated by our residents.

The City of Alexandria City residents of Fairlington Villages write to express both our agreements and concerns with the Alexandria West Draft Small Area Plan (June 2024, draft). The Fairlington Civic Association deferred to Fairlington Villages particularly those living in the City of Alexandria as its interested party of record since we are the immediately adjacent property owners and would be impacted directly by the proposed Small Area Plan (SAP).

Our concerns / comments are:

Fairlington Villages is a historically designated site of 2-3 story buildings. This Community was built in the 1940s to provide housing for civilian defense workers. In the 1970s, Fairlington Villages, and Fairlington, underwent renovations to become a condominium community. At that time, this was the largest condominium community in the area, and continues to be among the largest. The architect and contractor in the 1940s had a vision for providing a high-quality, livable community and as a result many generations have benefited and continue to benefit.

We are pleased that the south side of King Street will have a tree design-scape and that City staff has agreed that the north-side of King Street from 28th Street South to South 30th Street will not be disturbed and that these will both be included in the Alexandria West SAP. This area has provided tree coverage for the Alexandria City residents within Fairlington Villages adjacent to King Street and the high-rise and mid-rise buildings along the south side of King Street for over 20 years. It provides a visual buffer for our residents for 5 ½- 6 months of the year when leaves are present.

We hope that specific types of high-quality, non-city-scape external building design expectations will be a part of the proposed Alexandria West SAP for Area 2. Many of the building-designs constructed near Fairlington within the past approximately 20 years have been without charm nor are they attractive or appealing.

Throughout the development of the Alexandria West SAP, City of Alexandria residents within Fairlington Villages have been voicing their concerns about not wanting a city-scape built on the adjacent property (King Street Area 2), the partially adjacent property (150 Feet Height Neighborhood Area 2), and the proximate neighborhoods (Newport Village and Bolling Brook Condominiums Area 2).

Fairlington Villages' residents living in the City of Alexandria sent a letter (March 2023) with 51 signatures expressing a desire for a "small town look and feel" like Old Town for our area and another letter was sent in May 2023 with over 100 signatures expressing our vision for King Street and nearby neighborhoods (copies available upon request). The May 2023 letter stated that the Fairlington residents did not desire to have buildings constituting a city-scape built on the adjacent property and proximate neighborhoods. Fairlington Villages' City of Alexandria residents responded to a City survey (November 2023) stating their preference for Area 2 to continue as a suburban setting and not be redeveloped into a city-scape (list of names available upon request). These residents offered comments on the first draft of the SAP and a packet of comments (copy available upon request) was sent to City staff (March 28, 2024). The City of Alexandria staff met with two of our longtime residents and unit owners living in the City of Alexandria to discuss concerns about the second draft of the SAP (June 2024).

Attached are two documents that explain our concerns and visions for each of the three neighborhoods - 1) King Street Neighborhood Area 2; 2) 150 Feet Height Neighborhood Area 2; 3) Newport Villages and Bolling Brook Condominiums Neighborhood. One attachment has more details, and one attachment is a summary.

We appreciate your consideration of the issues presented in this letter and these attachments. Currently Fairlington Villages' City of Alexandria residents do not support the June (2024) draft of the Alexandria West SAP.

We continue to hope that our efforts and engagement may yield positive results for those in our neighborhood. We are open to a dialogue on these vital decisions that will dramatically impact the quality of life for Fairlington Villages Alexandria City residents.

Sincerely,

Melanie Alvord Fairlington Villages Ward VI Board Director and Secretary

Greg Roby, On Behalf of Holly Berman Fairlington Villages Alexandria City Resident

cc: Greg Roby, General Manager, Fairlington Villages Condominium Association

ATTACHMENT #1

Fairlington Villages, A Condominium (FVAC)

Detailed Requests for Each Neighborhood

King Street Neighborhood Area 2

As the adjacent property owners to this section of King Street, we ask to have input in the remaining 4-5 sites that could be re-developed within the new SAP.

The packet sent to staff (March 2024) included several pictures of three massively-sized high-rise buildings (Alexander, Northampton, Halstead Tower) located on the south side of King Street and built between 2006-2008. The buildings, as the pictures show, are taken from seven different locations within the City of Alexandria section of Fairlington Villages and have impacted our community.

With the building of the Alexander and Northampton, an immensely overwhelming site was created by placing two over-sized high-rise buildings extremely close together on an exceedingly small parcel of land. With the addition of the Halstead Tower, also a very wide high-rise on another small parcel of land and built close to the others, a long-established neighborhood setting was changed from a suburban, residential environment of 93 acres to be in the shadow of a city-scape setting.

A city-scape setting elicits a very different experience than a suburban setting.

Fairlington Villages' residents chose to buy their homes in a suburban neighborhood with similar suburban neighborhoods abutting our community. Our residents did not buy into a city-scape setting—a very different environment from the existing nearby neighborhoods.

For 5 ½ - 6 months of the year, due to the lack of leaves on the trees, these three tremendous buildings are intrusive and overwhelm our community. Over 200 families/individuals whose homes are in this area are affected by these buildings that are not of scale to the adjacent neighborhood (Fairlington Villages). This does not include the many residents who regularly walk through this part of our neighborhood.

The current draft of the SAP includes a proposal for the remaining four to five redevelopment sites on King Street within Area 2 to be 100 feet high with a 2.0 FAR.

Our Concerns

- Given the area's topography, any new building's juxtaposition, and/or redevelopment sites next to
 each other, and/or the size of the parcel of land, the proposed 100-foot-high buildings with a 2.0
 FAR will continue to have the same effects as the Alexander, Northampton, and Halstead Tower.
- The heights and building size should be in proportion to the adjacent to those in Fairlington Villages.
- The character and nature of the Fairlington Villages' neighborhood should be respected with the
 remaining redevelopment sites along King Street. This was not provided to us with the building of
 the Alexander, Northampton, and Hallstead Tower. We were hoping this would be included within
 this proposed SAP.
- Cap on heights (including affordable housing options)

- Attractive, appealing, timeless buildings (provided size is not increased).
- Fairlington Villages, along with the Pointe Condominiums, the two-story office buildings, the dry
 cleaners, the gas station and the former health department building do not constitute a city
 setting (high-rise or mid-rise), like Eisenhower, Pentagon City, Crystal City, Ballston, or DC midrise city neighborhoods. We would like to see a town-like setting as the direction for the remaining
 four to five re-development sites, if a suburban setting like the Pointe Condominium Community,
 is no longer available.

As referenced on the City's website, honoring the character and nature of the neighborhood is part of the City of Alexandria's vision and community development objectives. It is Fairlington Villages' desire to continue to collaborate as a stakeholder to honor the character and to strengthen and sustain our nearby and proximate neighborhoods.

150 feet height Neighborhood Area 2

For the 150 Feet Height neighborhood in Area 2, which is directly behind King Street with a corner portion being the adjacent property to Fairlington Villages, we are against a mid-rise or high-rise city-scape being built.

This is an established residential neighborhood, and we are asking that the character and nature of this established neighborhood be a part of the proposed SAP. In other words, please do not turn an established residential suburban neighborhood setting into a city setting.

The following seems to enable this neighborhood's current and established nature and character:

- Layout of the two high rise buildings
- Configuration of the two high rise buildings in relationship to each other
- Amount of open space between, above, and around each building
- The woods, vegetation, and two different four-story condominium communities within this boundary and
- A townhouse community immediately outside, but next to this boundary

As stated, the two four-story condominium communities (The Pointe and The Palazzo) are within the currently proposed 150 feet height neighborhood. One of the condominium communities (The Pointe) is adjacent to Fairlington Villages and runs parallel to I-395 and the other four-story condominium community (The Palazzo) is next door to the townhouse community and on the west side of the boundary along Hampton Road.

With the current proposal of a 2.0 FAR and the 150 feet height, a city-scape will be permitted in this neighborhood.

We also ask for a cap on heights (including affordable housing options) and attractive, appealing, and timeless buildings (provided size is not increased).

Newport Village Neighborhood and Bolling Brook Condominiums

For the Newport Village Neighborhood, which is also behind King Street and two other properties (Bolling Brook Condominiums and a small townhouse community), we are asking that a mid-rise city setting not be built here.

The Newport Village property on the north and east side is adjacent to a four-story condominium community named Bolling Brook and two different townhouse communities (Stonegate and a subsidized townhouse community).

We are asking for a town setting to be established. Our vision is more in line with Cameron Station, but with apartments or condominiums. We ask that time be devoted to determining how to include affordable housing within a town setting and honor the character and nature of the established residential neighborhoods that are literally next door to this property and have been here for many years.

Within the 1992 SAP, the heights were 45 feet for both Newport Village and the Bolling Brook Condominiums. We understand that the proposed change of height for Newport Village is to be increased to 60 feet to accommodate affordable housing. We understand and do support affordable housing.

We ask that the Bolling Brook Condominium heights remain at the 45 feet height and not be increased to a 60 feet height, as is currently being proposed, since Bolling Brook is a condominium community and not a rental apartment complex like Newport Villages that could be redeveloped.

ATTACHMENT #2

Fairlington Villages, A Condominium (FVAC)

Summary of Requests for Each Neighborhood

King Street Neighborhood Area 2

- Buildings in proportion to Fairlington Villages (adjacent property)
- Honor and respect adjacent neighborhood
- Height proportion to Fairlington Villages (adjacent property)
- Concerned that a city-scape setting (mid-rise or high-rise) can be built
- Cap on heights (including affordable housing options)
- Attractive, appealing, timeless buildings (provided there is no increase in size height/dimension)

150 Feet Height Neighborhood Area 2

- Honor character of current neighborhood strengthen and sustain it
- Build within nature and character of current neighborhood
- Concerned city-scape setting (high-rise or mid-rise) can be built
- Cap on heights (including affordable housing options)
- Attractive, appealing, timeless buildings (provided there is no increase in size- height/dimension)

Newport Village Neighborhood and Bolling Brook Condominium Neighborhood

- Prefer build is a town-like setting (i.e., Cameron Station) if suburban setting is not available
- Honor character of neighborhood strengthen and sustain it
- Keep the Bolling Brook Condominium neighborhood at 45 feet height
- Concerned city-scape setting (mid-rise or high-rise) can be built
- Attractive, appealing, timeless buildings (provided there is no increase in size- height/dimension)

Planning Commission Alexandria City Council City of Alexandria 301 King Street Alexandria, VA 22314

Attn: Christian Brandt

Subject: Alexandria West Small Area Plan

I support the Alexandria West Small Area Plan housing goals. Our community desperately needs more affordable housing, and more housing generally. We are gradually pricing out residents from being able to live and work in our community, which makes us a more fragile and segregated community. The Plan prioritizes inclusive growth, maximizing transit use, and minimizing displacement to meet our housing needs. It also provides access to amenities and promotes mixed-use affordable housing throughout the community, which will help make our community better and more enjoyable for the residents. I believe that the Alexandria West Small Area Plan is a great start to addressing the housing crisis in Alexandria. We desperately need more housing to meet the needs of our community, and the Plan provides a great framework for encouraging it.

I believe, however, that the City of Alexandria can accomplish more in this long-term plan to ensure housing affordability and prevent displacement of low-income residents from our city. First, I urge the City of Alexandria to remove Area 3 as it shelters wealthy low-density neighborhoods from growth and development. This is contrary to the Plan's goals to avoid displacement and encourage inclusive growth. Second, I urge the City to commit to allow more development and housing near the transit centers of Alexandria West.

- 1. Remove Area 3: The Plan shelters wealthy and low-density neighborhoods from development. This is contrary to our goals of inclusive growth and minimal displacement. Sheltering these neighborhoods will result in less inclusive growth, with lower-income residents priced out of certain locations because the affordable housing (such as small garden apartments) simply will not exist in these neighborhoods. Further, it means that residents are more likely to be displaced due to the lack of available affordable housing in these neighborhoods. To ensure all of Alexandria West is open to affordable housing, Area 3 should be removed and a baseline height of 85 feet should be allowed everywhere.
- 2. Allow greater development near transit: The Plan right focuses development along the Planned West End Transitway. Transit-oriented development is one of the best mechanisms through which we can encourage and support transit use in Alexandria. Transit-oriented development is important to address climate change, relieve congestion, and reduce crashes. However, I'd urge the City of Alexandria

to allow more growth near transit to maximize the supply of accessible housing. In some places, allowed heights are less than what already exists. We should allow heights of at least 150 feet near the Transitway, which is consistent with buildings in the area that already exist

In conclusion, I appreciate the opportunity to comment on the Alexandria West Plan in my personal capacity. I believe that the Plan provides a great opportunity to encourage inclusive growth, address housing needs, and create a vibrant community. The Plan envisions inclusive housing development, broader access to public transit, and convenient access to the neighborhoods of AlexWest. Given the goals in this Plan, I urge the City to remove Area 3 and to allow greater housing along the Transitway corridors as current limitations are contrary to the Alexandria West Small Area Plan goals. I believe that doing these things will encourage inclusive growth, improve access to reliable transit, and provide safe and vibrant communities in the AlexWest neighborhoods.

Sincerely, Dane Lauritzen, Resident of Alexandria

MEMORANDUM

July 31, 2024

TO: Christian Brandt, Jose Delcid, Jeff Farner; P & Z

CC: SWCA Board, Gus Ardura

FROM: Owen P. Curtis, President, SWCA

RE: Comments on the Draft Plan for the Alexandria West SAP

.....

Our Association has been actively involved in providing input to and feedback on all stages of the development of the Alexandria West Small Area Plan. You and your staff have joined a number of our meetings to present materials and to hear our comments. On March 27, we submitted seven pages of comments on the draft recommendations, and we attended the Open House on June 25, where we provided additional comments and engaged staff in some discussions.

At this stage of the process, we believe it most useful to provide Big Picture comments and concerns, rather than reiterate the many detailed comments we have already provided. We hope that staff, Planning Commission, and Council take these comments seriously, and work with us to amend and improve the plan.

Our overall concern with the draft plan is that it is not respectful of the many positive attributes of Alexandria West. As a consequence, it does little to protect, preserve, and enhance those positive qualities. Indeed, the very dense, urban vision shown in this document is a threat to the ambiance, character, openness, greenness, and pleasant living which attracted the current residents and businesses, and which continue to do so. The specific threats in this plan include:

- The West End Transitway (WET)
- Dwindling tree canopy and decreasing setbacks
- Increasing building heights.

Each of these is explained below.

The plan also fails to do several important things:

- Fully disclose the enormous changes coming to Alex West as a result of Zoning for Housing (ZFH) and the automatic blessing given in this plan to virtually everything which was approved and included in the BSAP 12 years ago. The BSAP should have been seriously challenged in this planning effort to see if it still makes sense in the larger context of Alex West.
- Develop strategies for preserving the market-affordable rentals which are the bulk of multi-family dwelling units in Alex West.

Provide an enhancement to the community by including a focus area or project - a
community center, if you will - that would help tie the various sub-communities
and neighborhoods together better than all the ad hoc development included in this
plan.

Each of these is explained below as well.

West End Transitway

The idea of the WET was hatched by some transit advocates on the Council nearly 20 years ago. Since that time, Alex West has seen enormous changes in land use (loss of nearly all office space), in demographics, and in life style, especially regarding commuting. Nothing in this plan asked the hard questions about whether a dedicated transitway still makes any sense. In general, Alex West today has a high level of transit service with connections to a large number of destinations. The bus routes penetrate the neighborhoods and thus walking distances to stops are short. There is no evidence of a pattern today or in the future that suggests a need for a special focus on higher transit speeds to get to the Van Dorn Station or to Shirlington (if Arlington is even going to continue the transitway through its territory). We in Alex West need to go to the Pentagon, King Street, Braddock Road, Old Town, Carlyle, Ballston, and many smaller destinations within the City far more than we need to go to Shirlington or Van Dorn, which is near the end of the line.

So this plan potentially supports spending several hundred million dollars for an unneeded facility that will destroy the beauty of the nicest boulevard in the City, N. Beauregard Street, from King Street to Sanger Avenue. It will make us walk farther to/from a stop, and create pedestrian safety issues to cross six or more lanes, especially for the children attending four elementary schools which are or will be along Beauregard.

We fully support location-specific improvements to signal timing, bus priority treatments, et al., and would be happy to work on improvements to our already excellent transit service, but otherwise, please remove this unwise, expensive, unnecessary, and ugly idea from the plan.

Trees and Setbacks

Alex West has only 33 percent tree canopy, compared to the national guidance for 40 percent. And we have experienced **major** tree canopy loss in the recent past due to how the City permits development to occur. Every new development in our neighborhood in the past 20 years has removed virtually every tree on the property. Examples include the Blake, where more than 100 mature hardwoods were removed; the St. James Place apartments and the townhouses next door, which wiped out nearly four acres of tree canopy; the Spire, or ... the list goes on and on, **and this plan does NOTHING to prevent that from continuing to happen.** Moreover, this plan is ALL about densification of development, trying to squeeze in more and more dwelling units on a finite amount of land. None of the proposed development will save our tree canopy; rather, new, dense development will continue to wipe it out. Building residences on existing surface parking

lots, most of which do have some trees, eats away at potential green space, and wipes out the trees in the lots.

The plan is full of very urban images, trying to show them as "green." But there are NO images of the quality of green openness and tree canopy that we have in Alex West. Our residents cannot relate to the images in this plan because NONE of them show what Alex West is all about and what we want to have maintained. In particular, all one has to do is see the near-zero setbacks of The Spire, St. James Apartments, or all the new development at King/Beauregard to conclude that this plan envisions a street, curb, sidewalk with narrow planting strip (if at all), and then the building. We in Alex West came here because the buildings were well set back from the street: 35–50 feet for SF homes, > 50 feet for places like Mark Center, and many apartment and townhouse developments.

The bottom line is this plan does not respect the quality of the Alex West neighborhoods, does not protect or preserve what is desirable, and is hell-bent on creating dense urban development like Crystal City, Rosslyn, or Carlyle. No one in Alex West wants that.

Building Heights

Alex West has some of the tallest buildings in the City. Tall buildings have a place in Alex West. Building heights *per se* are not so much the problem. Rather, it is where the plan permits the existing heights to be greatly increased that we find problematic. The building heights in general show no respect for the character of the neighborhood, nor for the provision of adequate light and air for adjacent buildings. A recent case in point was at 2000 N Beauregard St., for decades a four-story office building, well set back from the street and adjacent residences, surrounded by trees and parking. Now that site is the Blake Apartments, six stories, hard by the street and far too close to the adjacent residences, some of which now do not even get blessed with sunlight.

The previous plan kept ALL the really tall buildings between Beauregard and I-395. We asked at the start of this planning effort to preserve that, and to step down the heights as one got closer to one- and two-story residences. This plan instead brings heights too high into too many residential areas, and that is an affront to the people who live in Alex West. No one bought in with the idea that they would not be able to see the sun from where they live.

Major Coming Changes are NOT Disclosed in the Plan

In its discussion of the Focus Area, and in its discussion of Area 3, the text tends to downplay that anything much (if anything at all) has changed with this plan. The text fails to be candid with the residents of Alex West by these sins of omission. The plan needs to be fully candid and clear about two things:

• In the Focus Area, nearly everything was pre-approved as part of the BSAP, and it will bring INTENSE change to the Focus Area. And then the plan needs to clearly state exactly what will change: density, building heights, land use types, loss of thousands of mature trees, etc.

• In Area 3, which is nearly all SF homes, detached or townhouses, (of which, by the way, there is not one image of any in the plan report, further demonstrating that the plan cares not about such land uses/types), the plan needs to spell out all of the zoning changes which were made less than a year ago, and which will, when implemented, destroy the character of these fine residential areas. Multiple dwelling units on small SF lots, no off-street parking, etc. — these are ENORMOUS changes, which the average person in Alex West likely does not really know is coming their way. They must be spelled out in the plan.

Lack of Preservation Ideas for Market-affordable Housing

The City went to great efforts to reach out to the relatively low-income, non-English native speaking, chiefly immigrant residents of the many MF buildings in Alex West. This is to the City's credit. And the plan does flag the concerns these residents have about rent increases, evictions, et al. But the plan really does not present any concrete ideas on how to preserve such market-affordable rentals. Alexandria is not the only city in the US facing these issues, and they have been addressed over the past 75 years through a variety of options -- conversion to condo ownership via low/no-interest mortgages supported by government and charitable organizations, conversion to co-ops (in similar ways), etc. In Alexandria, this was done with, e.g., Park Fairfax in the 1970s. Can the funds be found to save ALL such market-affordable units? Perhaps not, but this plan spends its efforts on talking about trying to squeeze in new construction, which will not be market-affordable until it is as old as the market-affordable rentals currently in Alex West. The residents in the existing market-affordable housing are our neighbors and friends, and our children go to school together. We know, we work, we play with these folks, and they are working hard and saving to be able to buy into our neighborhood, which still has some of the most affordable SF housing in the city (small, older homes). To not come up with better ideas to preserve what we have, rather than focus on the more expensive "let's build some small amount of new affordable housing" truly misses the boat, and is greatly disappointing.

There Is No "There" There in The Plan

Pardon the quote of the old expression, but it seems to fit with our last concern. Since annexation in 1952, Alex West has grown in fits and spurts through a series of unrelated developments. Some were large – Southern Towers, e.g., – and had a modest degree of internal community. The Mark Center development – the old Hamlets with a common club and several pools, and the Hamlet Shopping Center with its park-like interior — were highly attractive, and created some modest common space for their residents. But the City has never invested in working with developers and/or using public funds to create a community center or focus area west of I-395. Contrarily, such an effort WAS done when Cameron Station was BRACed and developed, with a large park area being the public contribution.

This plan continues what many see as a neglect by the City as it does not propose some sort of public/private focus area for all or at least a significant part of Alex West. It can be hard to provide just one, give the long, narrow configuration of the planning area, but none are provided in this plan.

Our concept for such a place would be roughly where the Shops at Mark Center are. Adjacent are two elementary schools, a focus of human activity and foot traffic already. This plan should show/tell/order(?) the developers of that area to create, with the City, some open space, surrounded by retail and residential (with adequate parking, but behind the buildings) as a true Alex West community gathering place. The City is doing some of that at Potomac Yard, so why not here? Splash fountains for the kids, art in public places, etc. — City staff well knows what to consider and provide. There is no reason this plan should lack such amenities, which are available in other parts of the City.

While we appreciate that you have worked with us over the two years of the plan, you can tell that we are not satisfied with a number of critical aspects of the plan. We remain willing and able to continue working to get this plan improved by addressing the areas of concern that we have identified in this memo. Thank you.

Owen P. Curtis

Own & Courts

President

Seminary West Civic Association

August 9, 2024



Sent via email

Karl W. Moritz, Planning Director, City of Alexandria, <u>Karl.Moritz@alexandriava.gov</u>
Jeffrey Farner, Deputy Director, City of Alexandria, <u>Jeffrey.Farner@alexandriava.gov</u>
Carrie Beach, Division Chief, Neighborhood Planning and Community Development, City of Alexandria, <u>Carrie.Beach@alexandriava.gov</u>
Jose Del Cid, Urban Planner II, City of Alexandria, <u>Jose.delcid@alexandriava.gov</u>
Helen McIlvaine, Director, Office of Housing, City of Alexandria, <u>Helen.McIlvaine@alexandriava.gov</u>

Re: AlexWest Small Area Draft Plan

Dear Alexandria Department of Planning and Zoning and Office of Housing,

We, Tenants and Workers United, write to comment on the AlexWest Draft Small Area Plan. First and foremost, we appreciate all the staff of Planning and Zoning and the Office of Housing for taking the time to meet with our staff, but most importantly for taking the time to listen to our residents and their concerns regarding this planning process over the past. Our organization's intention in this planning process has been to voice the concerns that working-class families of color are facing across the West End of the City and seek actionable steps to address these concerns. Through many meetings, letters, and public comments, our organization has expressed recommendations and concerns from the beginning.

We are still concerned that the City is not prepared for the probable displacement that will result from the land use and planning and zoning changes in the West End. Working-class families who reside in the impacted neighborhoods, particularly tenants, continue to suffer from the high cost of rent, landlord-generated arbitrary fees, unsafe housing conditions, and a lack of tenant protections. This Alex West Small Area Plan could have been an opportunity for new, innovative, and proactive tools and resources that would protect and preserve existing communities, but we do not believe this plan will do that. The following are issues we want to raise regarding the Alex West Draft Small Area Plan:

• Preserving and creating deeply affordable housing:

• While we recognize this is only a land use plan, it still addresses many community topics that will guide the future of the West End. This plan will still have strong impacts on working-class families, and it does not explain how the city will preserve and create deeply committed affordable housing. It mentions focusing on strong partnerships with local property owners, developers, and city, state, and federal agencies to produce deeply affordable housing, but it does not break down that process, and it does not specify whether these partnerships will use proactive

- tools, policies, or financial investments to support housing. We continue to advocate for a locally funded housing voucher program and an expansion of the guaranteed income program, which will prevent our community members from being forced out of the City while we collectively work on more sustainable, long-term solutions to the housing crisis.
- Although the plan acknowledges that there is a great need for deeply affordable housing for the West End's working-class tenants, many of whom are people of color and immigrant families, the plan fails to guarantee more deeply affordable housing. Currently, the plan mentions the city's recommended affordability requirements are for housing at 60% AMI, which excludes many of our community members because they earn far less. The plan misses key opportunities to require deeply affordable housing when it recommends significant height and density increases to incentivize the development of parking lots and commercial areas, especially in the Focus Area. We urge you to require a significantly higher percentage of deeply affordable housing among net new housing development created by rezoning, more than the current proposed requirement of 10%.
- We are concerned about incentivizing development in areas that already include the majority of rental housing in this area. We would like to see the plan equitably distribute development impact and opportunities throughout the West End.

• Anti-displacement, neighborhood preservation, and tenant protections:

- The plan does not outline anti-displacement measures or explain how low-income communities will be preserved through programs such as a housing voucher program. It does not outline ways to protect West End residents from any development and does not mention any investments in displacement prevention. The current recommendations offer minimal tenant protections. While the city briefly and broadly mentions relocation plans, it does not break down what the city's technique will be. TWU believes the city's priority and vision for working-class families of color living in the West End should be for them to stay in their communities and not be relocated due to gentrification or development. The city's goal should be to keep families in their communities, not help them move.
- The current recommendations mention little about preserving existing affordable housing. Recommendations could include initiatives such as dedicating city land and funds to establish land trusts and cooperatives. We would like to see more concrete commitments from the city for housing preservation.

In our most recent discussion with City staff, we were told that most of our concerns outlined here fall under the Housing Master Plan. Once again, community members will have to participate in yet another city-led planning process. Our families have already engaged in the Housing/Zoning For All, the Alex West Small Area Plan, and, soon, the Housing Master Plan.

We understand that the City of Alexandria has to abide by a bureaucratic process, but it is frustrating for city residents to continue to engage in city processes and provide their input, only to be told that their input needs to be shared at another time, during another process. This frustration is compounded when residents are already worried about whether or not they will be able to continue living in the city they call 'home.'

Again, Tenants and Workers United appreciates being given the opportunity to provide feedback during this entire process and we hope our recommendations are taken into consideration.

Sincerely,

Ingris Moran Lead Organizer, Tenants and Workers United imoran@tenantsandworkers.org

CC:

City of Alexandria Mayor Justin Wilson, <u>justin.wilson@alexandriava.gov</u>
City of Alexandria Vice Mayor Amy Jackson, <u>amy.jackson@alexandriava.gov</u>
City of Alexandria Councilman Canek Aguirre, canek.aguirre@alexandriava.gov

City of Alexandria Councilwoman Sarah Bagley, sarah.bagley@alexandriava.gov

City of Alexandria Councilman John Chapman, john.taylor.chapman@alexandriava.gov

City of Alexandria Councilwoman Alyia Gaskins, alexandriava.gov

City of Alexandria Councilman Kirk McPike, <u>kirk.mcpike@alexandriava.gov</u>

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

Evelin Urrutia, Executive Director, Tenants & Workers United, eurrutia@tenantsandworkers.org Nathaly Zelaya, Community Organizer, Tenants & Workers United, nzelaya@tenantsandworkers.org

Comment from Kathie Hoekstra, resident of the WestEnd

Overall, I found this plan and the community engagement to create it good. I did find some unexpected excellent references dealing with ways to address the climate crisis such as district energy surprising, but very welcome. I did however find that City staff has not quite been able to grasp the concept of applying an overall lens of environmental justice to all plans and parts of plans for the City. You will recall that City Council set six principles to apply to all priorities and policies going forward. They include equity, environmental justice, civility, transparency, respect and service. From my perspective, this means weaving the impacts and solutions to the climate crisis into each section of this document rather than having just one section on sustainability in this SAP. This is a change and requires expertise that I think City staff is just starting to get its arms around and thus is difficult. Doing it the first time is most difficult but each time will get easier.

Overall – big picture – general comments on the plan:

Given the above, while I appreciate the content of the sustainability and open space chapter, I would urge you to include a paragraph or 2 that addresses the impacts of the climate crisis/environmental justice and how this plan addresses the impacts in each of the other chapters. For example, because of the increase in heat and extreme weather events with associated power outages – buildings that are much more energy efficient reduce the energy burden on residents and allow them to remain in their homes for longer during power outages.

When it comes to environmental justice, I think what may be missing is the "why". Everyone should have clean air and clean water – both inside and outside. Building buildings that are energy efficient and not having to burn fuel to create the power to heat the buildings (vs. fuel provided by the sun, wind or water) means increased clean air inside and outside. So early on perhaps on page 7, I suggest you include a reference to environmental justice in the center boxes where you include people, culture + diversity and social spaces and community.

Second, all Small Area Plans are supposed to incorporate other citywide plans/policies such as the Mobility Plan. Therefore, at the beginning this plan there needs to be a specific reference to:

- a) the Environmental Action Plan (with a target of 50% reduction in pollution by 2030 and 80-100% by 2050),
- b) the Energy and Climate Change Action Plan (with its requirement of 95% of new buildings must be high performance) as well as
- c) the Climate Emergency Declaration (costs to address the climate crisis will only go up as time moves forward) declared in 2019.

This is <u>VERY</u> important in this Plan since we have had developers in the past suggest they only have to comply with the Green Building Policy and ignore the other Citywide policies and plans

that may affect their developments. Thus, they have no plans to eliminate the use of fossil fuels by 2050. There is no point in having these policies if no one has to think about how they must comply with them in the future. After all developers must comply with all the other specific plans on specific subjects – environmental plans/policies should be no different.

Third, as an example, the Housing chapter should include the fact that many of the residents of affordable housing and even market rate housing have very high energy bills (\$250+/month) and poor indoor air quality per the Healthy Homes project results. If we set high energy efficiency requirements via the GBP this reduces the monthly cost of energy by up to \$200/month and makes their indoor air much cleaner - thereby reducing asthma rates for the children who live there. This is an example of the kind of environmental justice reference that should accompany each major chapter.

The Plan should include something similar to the Mobility chapter and perhaps some of the others.

Specific items with page references.

Pg 73 – Really excellent – reducing heat islands and parking lots that affect stormwater quantity and quality while encouraging more tree planting that helps improve water quality, air quality and reduce stormwater impacts as well. Also improves mental health of nearby residents. Also possible to include the collection of rainwater with larger buildings in cisterns and use this gray water in local irrigations systems to reduce runoff and reuse water thereby reducing water and stormwater fees.

Pg 74 – Excellent reference to district wide energy. The City should be asking our elected officials to make sure current laws will allow buildings with a street separating them to share hot/cold water/air. Also every new building should include ground based heat pumps unless the footprint is too small.

Pg 74 – Resist the temptation to use jargon – like greenhouse gas (GHG) because a majority of the public doesn't know or understand these words. I suggest instead you use words such as air pollution or water pollution that results in extreme heat and/or extreme weather events or something similar. Nearly everyone understands the need to provide everyone with clean air and clear water. They also should understand less pollution or bad air/water makes their life better and more pollution bad air/water makes their life worse. Perhaps also show a picture of solar panels on a roof in the diagram on page 74

Pg 75 – Recommendations – regardless of what the Green Buildings Policy says – developers should comply or show how they will comply with:

- a) the targets of the EAP,
- b) ECCAP implantation requirements on page ES-7, and
- c) Climate Emergency Declaration.

If everyone can just ignore these citywide policies and declarations then they become meaningless and a waste of taxpayers' money. We don't let residents and business owners comply with just a few of the citywide policies – they must comply with ALL, but somehow we fail to include the requirement for climate crisis policies. Are these just the city's "poor stepchildren" policies or are they as important as housing, mobility and stormwater? If so, we need to demonstrate that within this document and all future SAPs.

Pg 79 Mobility + Safety – Also Implementation page 127 Project 4: What about biking and other connections within this SAP but between other Focus areas such as between area 3 and 1 or 3 and 2? Even though we are focusing on development outside of Area 3 we still need to make sure we are thinking about how to connect all the 3 areas other than just for cars. Thus, how do we improve travel by other mobility options other than cars across all 3 areas?

Pg 80 B – we must cite the EAP and ECCAP targets, not just the GBP since all are policies or plans adopted by Council. Perhaps also cite the Climate Emergency Declaration and highlight some of its specifics such as reducing pollution as fast as possible and the costs of not doing this now will only increase over time as well as reduce property values and thus income for the City.

Chapter 9 neighborhoods – perhaps in the first page of each neighborhood section show a map with the full WestEnd and then a cut out of the specific neighborhood you are going to talk about. At this point, I don't believe the residents or business owners are familiar enough to know when you talk about for instance the Terrace Neighborhood – where that is within the WestEnd.

Restore RPA, especially the Greenway neighborhood – note all areas within the RPA or near the RPAs should consider the potential impacts of extreme weather and the flooding events. Thus all those areas should be able with little expense to recover from extreme flooding easily and we should exclude wherever possible any building or expensive amenities within the flood zone. We don't need to spend another 10 years waiting to restore bridges or other infrastructure on or near streams that will flood today and worse tomorrow.

Implementation: page 127 – Project 5 – What other Recreational facility in the City is only part time for residents – like Ramsey in the WestEnd? This is another indication of the lack of respect the residents of the West End get from the City. This must be part of the next years CIP budget. Also, since it may be likely future development will be eliminating outdoor pools within or bordering RPAs, we <u>MUST</u> include City replacement pools. Once again, the WestEnd has a large population but no city owned/maintained indoor or outdoor pools. This amenity must be included in future development.

Implementation: page 127, Item 7: Access to Mulligan Park – looks like this park needs some serious work to eliminate invasive bamboo and converting natural areas to native plants.

Implementation: page 128, Item 1: I think you meant this to refer to Figure 8.10 vs. 8.11 – please correct this.

Implementation: page 128-9, Housing - Items 4-8: Perhaps the City should explain exactly how it expects residents to respond to increased rents that are inevitable as the area gentrifies and the City is unable to guarantee a one for one replacement of housing units that don't cost more.

Implementation: page 129-130, Mobility – Items 9-18: Item 10 & 12 as above – For instance - make sure you are connecting Lincolnia Hills development in Focus area 3 with the other areas that are undergoing more development. Just because Focus area 3 is not undergoing development doesn't mean it should not be considered when trying to encourage mobility connections within Focus areas 1 and 2. This will be even more important if some of the sinlge family homes are converted to 2-6 flats.

Implementation: page 130, Parks & Open Space, Item 20 – This should be upgraded to Short Term to get it into the City budget as soon as possible since it will take several years to build before it opens. In addition, since we already have only a part time Rec Center in West End if we are serious about equity and environmental justice this needs to be fixed now, not later.

Implementation: page 130, Sustainability, An added Item should be included here: Comply with City's Environmental Action Plan and Energy and Climate Change Action Plan as well as City's Climate Emergency Declaration and all developers should have to explain how their development would comply with eliminating pollution (greenhouse gases) by 2050, etc. We MUST NOT rely solely on the Green Building Policy because we do not know whether it will get us to the final target Council supported in the EAP, ECCAP and Declaration.

Implementation: page 130 Item 24 – Yes, Yes but please explore whether there are any legal impediments to buildings sharing hot/cool air or water across public streets. Explore and confirm this it OK now so the General Assembly can address any impediments ASAP.



August 8, 2024

Via Email

To:

Karl W. Moritz, Planning Director, City of Alexandria, Karl.Moritz@alexandriava.gov
Jeffrey Farner, Deputy Director, City of Alexandria, Jeffrey.Farner@alexandriava.gov
Carrie Beach, Division Chief, Neighborhood Planning and Community Development, City of Alexandria, Carrie.Beach@alexandriava.gov
Helen McIlvaine, Director, Office of Housing, City of Alexandria, Helen.McIlvaine@alexandriava.gov

Re: AlexWest Draft Small Area Plan Comments

Dear Alexandria Department of Planning and Zoning and Office of Housing:

The Legal Aid Justice Center¹ writes to comment on the AlexWest Draft Small Area Plan. We comment based on our experience representing and advocating alongside low-income tenants across Northern Virginia and the Commonwealth. The single-most important concern we hear from community members is the lack of deeply affordable housing, which is already pushing low-income people and people of color out of Alexandria. We recognize and appreciate your significant efforts to invite community input and promote affordable housing and anti-displacement strategies in the proposed Plan. Throughout the process, we have echoed the concerns of community members that the Plan does not do enough to prevent displacement and secure deeply affordable housing. We continue to raise those concerns today.

We urge the City to strengthen the AlexWest Draft Small Area Plan so that it does more to preserve deeply affordable housing and prevent displacement. We are concerned that this Plan as drafted will incentivize large-scale development changes without sufficient protections in place to prevent the displacement of the West End's low-income tenant communities. To prevent this outcome, we ask you to consider the following recommendations:

• Require Meaningful Affordability in Exchange for Development Incentives: The Plan incentivizes new market rate housing throughout the Plan area by increasing allowable height and density, but does not require meaningful deeply affordable housing in exchange for those incentives. We reiterate our recommendation that the City require a significantly higher percentage of affordable housing in exchange for the new housing development created by rezoning, above the current 10% proposed requirement. The City should re-evaluate its assessment of the commensurate affordable housing required in exchange for the significant increases in height and density developers will receive in this

¹ The Legal Aid Justice Center (LAJC) is a non-profit organization that provides free civil legal assistance and advocacy on behalf of low-income individuals and families across Virginia. We partner with communities and clients to achieve racial, social, and economic justice by dismantling systems that create and perpetuate poverty.

Plan. If the City does not require meaningful affordable housing, Alexandria will incentivize construction of market-rate housing and redevelopment of older buildings, which will generate displacement of current very-low-income tenants.²

- For example, the City of Charlottesville requires all projects exercising the option of building over 10 units to provide 10% of the total units to households at 60% AMI or below. This is a significantly higher percentage than the Plan, which requires only 10% of the net new development to be affordable.³
- The Plan continues to concentrate development incentives in sectors of the West End where most very-low-income tenants live. The Plan should equitably distribute development impact and opportunities throughout the West End.
- **Review Development Impact:** The Plan should establish a policy that land use application review materials must include a review of the likely displacement impact of proposed projects. This is critical to helping the City to understand displacement impacts and to monitor and evaluate the impact of the Plan's policies.
- **Deepen Affordability:** The Plan recognizes the extreme rent burden that low-income tenants in the West End experience but does not take the critical step to guarantee deeply affordable housing at below 60% Area Median Income (AMI). This housing is out of reach for the vast majority of LAJC's client community. The Plan should explicitly preserve and promote housing affordable at 40% AMI.
- Increase Preservation in Affordable Areas: We continue to recommend that the City identify areas that provide critical affordable housing and meet the needs of lower-income residents, and act to preserve these historic and diverse neighborhoods. The City should require additional affordable housing guarantees and conditions that foster social, economic, and cultural diversity in exchange for development incentives in these areas. For instance, the City could consider similar factors as in Arlandria-Chirilagua, where Alexandria implemented deeper affordability requirements in order to preserve the neighborhood's cultural history and economic diversity. The City should also consider Charlottesville's example, where the land use requirements in the Residential Core Neighborhood and Core Neighborhood Corridors support moderately-priced and affordable housing, public health, cultural heritage, employment opportunities, and a harmonious community.
- Increase Tenant Protections for Redevelopment: We recommend that the City specify tenant protections for tenants facing redevelopment, beyond the Tenant Relocation Assistance Plans mentioned in the Plan. The City should make clear that the goal of relocation plans is to prevent displacement. The protections should include mandatory

_

² Incentivizing upzoning without sufficient protections can worsen affordability pressures. See https://www.brookings.edu/articles/to-improve-housing-affordability-we-need-better-alignment-of-zoning-taxes-and-subsidies/; https://www.urban.org/apps/pursuing-housing-justice-interventions-impact/increasing-housing-supply. Building subsidized affordable housing is significantly more effective at reducing housing cost burden and preventing displacement than market-rate housing. See Zuk, Miriam & Chapple, Karen, Housing Production, Filtering and Displacement: Untangling the Relationships, Berkeley Institute of Governmental Studies, 2016, https://escholarship.org/uc/item/7bx938fx.

³ https://charlottesville.gov/DocumentCenter/View/11104/Development-Code-PDF?bidId= at 4.2.2.

https://media.alexandriava.gov/content/planning/SAPs/ArlandriaChirilaguaSAPEnglishCurrent.pdf?_gl=1*5502b7* _ga*MTk4MjgzNjU3NC4xNjI2ODk5OTcx*_ga_249CRKJTTH*MTcyMjk3MzIwMC4yMjMuMS4xNzIyOTczMz EyLjAuMC4w at 11.

⁵ https://charlottesville.gov/DocumentCenter/View/11104/Development-Code-PDF?bidId= at 2.2.3, 2.9.6.

- relocation plans, relocation assistance, just cause lease protections, and the preference to return, wherever possible. Jurisdictions such as Arlington County⁶ and Fairfax County⁷ have implemented or are planning to implement these protections.
- Concrete Preservation Actions: The Plan should include concrete plans and action items around preserving existing affordable housing, including initiatives such as land trusts, cooperatives, and dedicating public land for deeply affordable housing.
- Targeted Investment to Prevent Displacement: The Plan should guarantee investment in deeply affordable housing that is targeted directly to the West End. Incentivizing new height and density without simultaneously increasing the public and private investment for deeply affordable housing results in gentrification and displacement. 8 The City should also guarantee resources for programs such as a local housing subsidy and the guaranteed income pilot program, which help alleviate rent burdens and prevent displacement while more long term solutions are put in place.
- Measure and Evaluate: The Plan should include regular monitoring and evaluation, to review whether the proposed policies meet the objectives. The City should also conduct regular re-evaluations of the proportionality of the affordable housing requirements, to best adjust to improving development incentives.

The City of Alexandria must take meaningful action to address disparities in housing needs and opportunities for its low-income residents and communities of color. 9 Alexandria must also create affordable housing sufficient to meet the needs of its lowest-income residents. 10 With these obligations in mind, we urge you to seriously consider our recommendations. We thank you for taking our comments into account and remain open to meeting with the City for further conversation.

Sincerely,

Larisa Zehr

Li Ju

Attorney, Legal Aid Justice Center

larisa@justice4all.org

cc:

Richard Lawrence, Principal Planner, Richard.Lawrence@alexandriava.gov Jose Delcid, Urban Planner, Jose.Delcid@alexandriava.gov Christian Brandt, Urban Planner, Christian.Brandt@alexandriava.gov

⁶ https://arlington.granicus.com/MetaViewer.php?view id=2&event id=1242&meta id=175999.

⁷ https://www.fairfaxcounty.gov/planning-development/sites/planning-

development/files/Assets/documents/CompPlanAmend/affordable-housing-preservation/Adopted-Text-2017-P-14.pdf; https://www.fairfaxcounty.gov/boardofsupervisors/sites/boardofsupervisors/files/assets/update-to-fairfaxcounty-relocation-guidelines 1.pdf.

⁸ https://www.brookings.edu/policy2020/bigideas/to-improve-housing-affordability-we-need-better-alignment-ofzoning-taxes-and-subsidies/.

https://www.hud.gov/sites/dfiles/FHEO/documents/Frequently Asked Questions 7 14-21.pdf.

¹⁰ Va. Code § 15.2-2223(D).

From:



Subject:

[EXTERNAL]AlexWest draft June SAP - compiled community comments/questions

Date: Wednesday, July 31, 2024 4:40:44 PM

Dear Christian,

Below are 4 of our concerns/questions regarding the draft June AlexWest SAP.

We understand that we can send it this way and that this will be included in the compiled community comments and questions and will be answered by staff. Is our understanding correct?

Sincerely,

Holly Berman and Melanie Alvord

For any new buildings in the Area 2 neighborhoods including King Street (Area 2) and King Street (Focus Area), how do we ensure that any new buildings be charming and timeless, like some of the new buildings in the North Potomac Yard Small Area Plan or some of the buildings (like the Alban Towers) on Wisconsin and Massachusetts in DC or 3 of the building designs that were sent to staff via a staff-requested project (September 2023)? We are also trying to avoid having city-scape looking buildings or unattractive and unappealing ones that are currently on King Street in Area 2.

Within the 1992 SAP, the heights were 45 feet for both Newport Village and the Bolling Brook Condominiums (Area 2). We understand that the proposed change of height for Newport Village is to be increased to 60 feet to accommodate affordable housing. We understand and do support affordable housing. However, we ask that the Bolling Brook Condominium heights remain at the 45 feet height and not be increased to a 60 feet height, as is currently being proposed, since Bolling Brook is a condominium community and not a rental apartment complex like Newport Villages that could be redeveloped. We are hoping that is a possibility for us. Is it?

Given there are not specifics and details such as set backs, topography, juxtaposition of buildings in relationship to the established low-rise residential neighborhoods or other buildings, proportion of building to land, etc., in Area 2 within the AlexWest June draft SAP, how do we ensure that any new building have the needed specifics and details so that the established low-rise residential neighborhoods are respected? How do we ensure that any new buildings respect the established low-rise residential neighborhoods in Area 2? From our viewpoint we felt this had not been done with the building of the Alexander, Northampton and Halstead Tower. Our concerns of these three buildings such as heights, widths, dimensions, proportion of building to land, respecting established adjacent property and low-rise neighborhoods to name a few were not included in the development process from our perspective.

Within the Newport Village neighborhood (Area 2), we ask that it not be a city-scape setting with any new redevelopment. We ask that the setting either honor the neighborhood setting of the established low-rise residential areas (Stonegate Townhouses, Bolling Brook Condominiums, The Palazzo) or it have the look and feel of a town setting as in Cameron Station (as opposed to a city-scape setting as in the Eisenhower neighborhood near Wegmans). Would that be possible?

DISCLAIMER: This message was sent from outside the City of Alexandria email system. DO NOT CLICK any links or download attachments unless the contents are from a trusted source.

From:

To: Christian Brandt

Subject: [EXTERNAL]Alexandria West Planning comments

Date: Wednesday, July 31, 2024 11:59:53 AM

You don't often get email from kmhinman@gmail.com. Learn why this is important

Greetings,

I am very late in getting to this (in part because I have in the past felt as if planners were only hearing what that wanted to hear) and so do not have as many specific comments or questions as I might. However, I wanted to share a few:

- 1) Figure 2.4 shows that the existing greenspace (in front of the Double Apple / across Seminary from the Blake) is approved for a building height of 100ft (or 125 with automatic waiver approval). Previous plans discussing Upland Park showed that this was to remain greenspace. What is the current plan for this corner of Seminary and Beauregard? The existing open space is also not identified as such in Figures 5.1 and 5.3. Figure 8.1 is not completely clear on this topic, and (I am assuming because the Double Apple folks wouldn't sell) it is not included in the Upland Park design.
- 2) I regularly ride my bike up and down Fillmore between Seminary and Beauregard (on average twice a week excepting winter), and I am very concerned about the REDUCTION in cyclist (i.e., my) safety that putting "protected bike lanes" on this particular street would effect. I am happy to elaborate; how can I become more involved in the planning process? [As an additional note, I don't think that I have once in all of the years I have been riding there ever encountered another cyclist on Fillmore despite the bike share rack. While I recognize that folks may well be riding there when I am not, I have to believe that it isn't terribly common despite being currently a much safer option than riding to and from Beauregard and Skyline on Seminary.]
- 3) On a related note, I do, however, routinely see cyclists riding up hill on Beauregard from King to the corner with Seminary, which must currently be done with traffic and will remain that way under the existing plan -- given that the proposed Harris Teeter Access route / multiuse path as I last understood it is only planned for the downhill route. Is the grant from Harris Teeter (or the property owner / developer), by any chance? There is an existing sidewalk that is more than adequate for the current level of foot traffic, and cyclists have the advantage of riding downhill with the traffic on that side. It's been a little sketchy with the construction, but it is still downhill. If you were only going to put a multi-use trail on one side, being protected from cars going uphill (so at reduced speed) while simultaneously extending Arlington's multi-use trail on the other side of King would seem to make more sense. Currrently, crossing King from that trail is a bit of a Hail Mary every time, and having to cross Beauregard twice to access (and then leave) the multi-use trail isn't much of an alternative.
- 3) Making Winkler preserve more apparent and accessible will be very nice. I have lived in my current location for over 15 years, and I have never stumbled across the entrance. I also whole-heartedly approve the park expansions. The existing park areas see a lot of use from a wide variety of folks, and it would be even nicer for there to be more such spaces for families as well as those out for exercise. Still not optimal for cycling, though, so I am wondering about ways to discourage cyclists from blowing through at high speeds (sometimes

electronically assisted) or in large groups. I ride through there occasionally but slowly and cautiously. I have seen others at speeds and / or in groups that feel unsafe given the many small kids, dogs, etc., that walk along that trail. Of course, having the bridge and tunnel out for so long has cut down substantially on that traffic, but we are still planning to repair that, correct?

4) As a general comment, "encouraging" developers to do something (e.g., retail) will have zero impact unless also incentivized, so I hope that incentives are included.

V/r, Kathleen

DISCLAIMER: This message was sent from outside the City of Alexandria email system.

DO NOT CLICK any links or download attachments unless the contents are from a trusted source.





August 1, 2024

Jeffrey Farner, Deputy Director Development Division, P&Z 301 King Street, Room 2100 Alexandria, VA 22314

Re: Alex West Small Area Plan Southern Towers

Dear Mr. Farner

Thank you for meeting with my client, CIM, and me this week on Monday July 29, 2024 to discuss our concerns with the text of the draft Alex West Small Area Plan ("SAP") recommendations for Southern Towers (the "Property"). As you know, any redevelopment of the Property will displace a significant amount of surface existing surface parking, which will need to be replaced by above ground parking garages. These replacement garages are necessary to relocate existing parking in order to provide the extensive street network and open space areas recommended in the SAP. CIM supports the City's efforts to concentrate redevelopment near the future BRT station on the Property and retain the existing residential units on the Property. Attached is a preliminary study of the potential redevelopment which shows potential locations for redevelopment, locations for above grade parking structures and potential road network. With the attached guiding CIM's review of the draft SAP, please note the following requested edits/amendments:

- 1. BRT Location and Design. CIM supports the City's efforts to bring a BRT station to Southern Towers. The scope and parameters of the BRT station design and adjacent road network have not been studied. Therefore, the SAP should note that the depictions and location details are a general concept.
- 2. Replacement Parking Garages. The SAP should explicitly acknowledge the need for replacement above ground parking garages. The current draft does not depict replacement parking garages and it is confusing to members of the public and future City reviewers to not explicitly depict replacement garages as separate from future redevelopment. In addition, the SAP should show the potential locations as shown on the attached exhibit. Any replacement parking must be in close proximity to the existing residential towers and cannot accommodate any below-grade levels. The replacement garages should not count towards the 3.0 FAR or the SAP should include a note that allows for additional FAR as part of the rezoning to a CDD to accommodate the FAR allocated to replacement garages.
- **3. Building Height**. The existing buildings on the Property are over 150 feet. The draft SAP does not acknowledge this fact on the recommended height exhibit. In addition, CIM

requests a recommended maximum height of 150 feet along Seminary Road, in between existing buildings, and near the future the BRT Station.

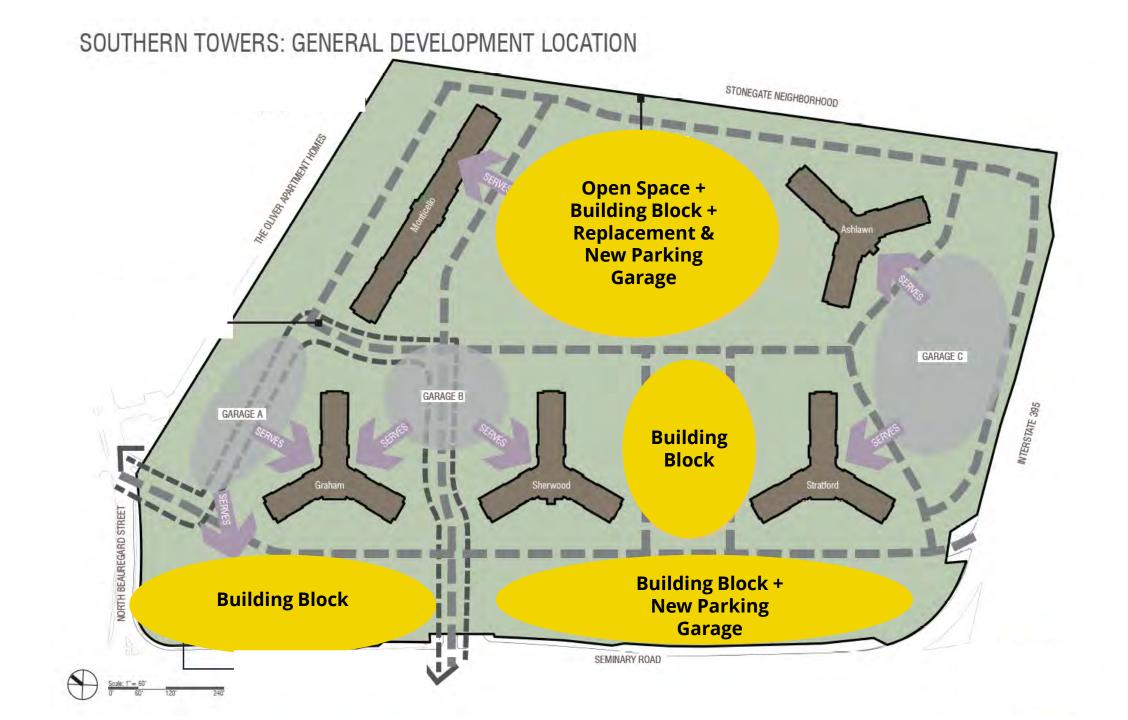
- 4. Recommend and Required Streets. CIM supports the required street designation parallel to Seminary Road and for the BRT loop road. All other roads must be recommended as a specific street design and cross section cannot be agreed to until the full redevelopment of the Property is studied as part of a rezoning application. Therefore, a note should be added to the SAP that states final cross sections of the roads shall be worked out as part of the rezoning process.
- **5. Building Frontage and Location.** The street wall label is confusing and does clarify the permitted building location. We request that this label be replaced with "building block location". In addition, we request confirmation that future buildings are permitted to front the back of the public right of way with no additional setbacks. The current street wall description appears to require an additional setback from the right of way.
- **6. Open Space.** The existing open space on the property is entirely private open space for the use of Southern Towers residents. While CIM understands and supports the need for public open space to serve City residents that do not live a Southern Towers, we request the following changes to the amount of open space, and clarification and flexibility to work through the open space details during the rezoning process:
 - a. The SAP should state that the total recommended at grade open space should be 150,000 feet and not 169,000 square feet. The SAP should note that this open space can be a combination of public and private open space.
 - b. The central public open space area should be no less than 2 acres. The remaining open space area to meet the SAP recommendation will need to be private.
 - c. The remaining open spaces areas should have blurred boundaries to indicate flexibility in configuration and location. Any member of the public reviewing this plan may interpret this precise size and location as firm requirements. This cannot be confirmed until the full site is studied as part of the rezoning.
 - d. The pedestrian trial along 395 should be removed. This is a portion of the site without immediate neighbors and should be utilized as an area for replacement parking and to screen the remainder of the site from the traffic noise.
- 7. **Design Standards.** The draft design standard requiring a full building break for any building that exceeds 250 feet of frontage is not tenable. This requirement will preclude any and all redevelopment of the Property. This requirement can and should be referenced as a design guideline which can be addressed in the DSUP approval. In the alternative, this requirement could be referenced as one potential option to address the length of building frontage or this "standard" should be applied to building with greater than 400 feet of frontage.
- **8. Permitted Uses.** We request confirmation that the SAP does not require or limit future uses to residential. Should the market conditions change, any and all uses that meet the

SAP parameters should be permitted with the future rezoning, including, offices, hotel, retail, senior living and town homes.

9. General Conformance. Finally, we request a note specific to Southern Towers property that acknowledges that the existing residential towers, limited site access, need to accommodate the BRT Station and necessity of replacement parking garage must be addressed in order to redevelop the site. Therefore, it would be helpful to the community and future developers to acknowledge that the layout shown in the SAP is very conceptual and that future applications will need to meet the principles of the SAP but not the precise layout.

Should you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,





Kenneth W. Wire kwire@wiregill.com 703-677-3129

Updated August 1, 2024 June 12, 2024

Mr. Jeffrey Farner, Deputy Director Development Division, P&Z 301 King Street, Room 2100 Alexandria, VA 22314

Re: Alex West SAP Newport Village

Dear Mr. Farner:

Thank you for meeting with my client, UDR, on March 27, 2024 and May 30, 2024 to review Staff's Alex West SAP ("SAP") recommendations for Newport Village located along N. Beauregard Street and W. Braddock Road (the "Property"). I attended the April 25, 2024 virtual meeting in which Staff presented updated recommendations to the SAP. We have also reviewed the June 2024 draft of the SAP.

As discussed multiple times with staff, UDR requests an **85' max height along Beauregard** to facilitate alignment of future plans with the current SAP goals. Additionally, a height of 85' is consistent with adjacent properties and compatible with the 93-foot height of the recently approved multifamily building at the corner of Beauregard and Braddock (DSUP 2020-10026). UDR supports the transition to lower building heights within the Property moving off Beauregard and down West Braddock.

As we had also agreed during that meeting, other similarly situated properties along Beauregard are shown as a 2.0 FAR in the SAP. This same recommendation should also apply to Newport Village. Pairing the additional height requested above with a 2.0 FAR across the entire site and a SAP recommendation to concentrate new development on Beauregard will enable UDR to concentrate density closer to the adjacent BRT station. Consistent with stated goals, UDR requests a specific note on Table 8.13 that UDR's density can be concentrated without requiring the use of Section 7-700.

In addition, there is extreme topography on UDR's parcels which further complicates redevelopment. UDR requests that the SAP recommendations for open space be 25% of the total lot area, provided by a combination of at grade and above grade open space.

UDR looks forward to continuing to work with the City and the community to ensure the SAP recommendations for the Property are viable while maintaining the Plan's goals.

Sincerely,



Kenneth W. Wire kwire@wiregill.com 703-677-3129

August 1, 2024

Jeff Farner, Deputy Director Development Division, P&Z 301 King Street, Room 2100 Alexandria, VA 22314

Re: **Adams Neighborhood Monday Properties**

Dear Mr. Farner:

On behalf of my client, Monday Properties ("Monday"), I am submitting 1) the attached comments on the draft Alex West Small Area Plan ("SAP") and 2) am mark up with comments on specific pages of the SAP. Monday appreciates the significant progress made with staff in working through the layout of the overall Adams Neighborhood and layout of the 1900 Beauregard building. We, however, request confirmation from staff that the various "Design Standards" in the draft SAP will not require a redesign of the 1900 building.

Thank you for your attention to this matter. Should you have any questions, please do not hesitate to contact me. I look forward to discussing this with you.

Kan Alba)

Monday Properties Comments to Draft Alex West Plan

<u>Chapter 1 – Maintaining Community:</u>

No comments

<u>Chapter 2 – Inclusive Growth:</u>

- General comment need confirmation the 3.0 FAR recommendation for the majority of the Focus Area in Table 2.1 on page 16 and under "Floor Area Ratio" on page 20 will also apply to the Adam's Neighborhood.
- Urban Design + Public Realm (page 20) notes Development will comply with the Design Standards. This language should be softened (see comments to Design Standards below).
- Figure 2.4: Building Heights (page 21) Change the height for 1800 N. Beauregard to 100 ft. vs. 85 ft., to be consistent with the remaining blocks in the Adams Neighborhood, Staff comment for varied height across the remaining blocks, and so the heights are consistent on both sides of Highview Lane. [see attached markup to Figure 2.4]

Chapter 3 – Housing Affordability:

No comments

<u>Chapter 4 – Mobility & Safety:</u>

 Figure 4.3: Street Dimensions & Types – change street cross section in Adam's Neighborhood between 1800 N. Beauregard and 1900 N. Beauregard to 54 ft. per conversations with Staff. [see attached markup to Figure 4.3]

Chapter 5 – Public & Connected Open Spaces:

 Page 60 – Delete comment in second paragraph, "In locations where the Plan allows land use to be either residential or commercial, development that is entirely residential will provide an additional 10,000 square feet of public open space consolidated with other nearby planned parks." – Public Open Space totals should match those shown in Chapter 8. [see attached markup]

<u>Chapter 6 – Sustainable & Healthy Communities:</u>

 Page 74 – Green Building & Energy Efficiency: delete reference to, "District-wide energy systems to efficiently combine building heating and cooling loads..." Not realistic or feasible to combine energy systems with another building that is under separate ownership and develop at different times. [see attached highlighted section]

Chapter 7 - Recommendations:

- Inclusive Growth:
 - D.11 Change "Design Standards" to "Design Guidelines" (See more detailed Design Standards comments below).
 - D.12 Delete recommendation. Block dimensions not yet defined and mid-block breaks are not economically viable with mid-rise residential construction in this

area and will artificially limit future growth and the addition of new housing (see detailed Design Standards comments below).

- Mobility and Safety:
 - A.28 Add to the end of the recommendation the same language from A.27 above, "...unless location-specific issues not addressed by the Plan emerge during the development review process."
 - B.35 Delete or clarify comment regarding requirement to "provide pedestrian connections within development blocks."
 - D.39 Recommendation too broad. "Development will provide <u>all necessary</u> <u>transit access and amenities</u> to mitigate the impact caused by the (BRT) development." Delete recommendation or clarify what the requirements are.
- Public + connected open spaces:
 - B.44 Change last sentence of the recommendation to provide credit for dedicated ROW, and not just public parks and open space. If the combined ROW dedication and public parks/open space is less than 10% of the site area, then the development will provide a greater portion of the at-grade open space as part of the 25%. Given the number of new streets and ROWs in the Plan, the calculation needs to factor in that dedicated land area.
- Sustainable & Healthy Communities:
 - o B.52 Delete recommendation. Too broad.

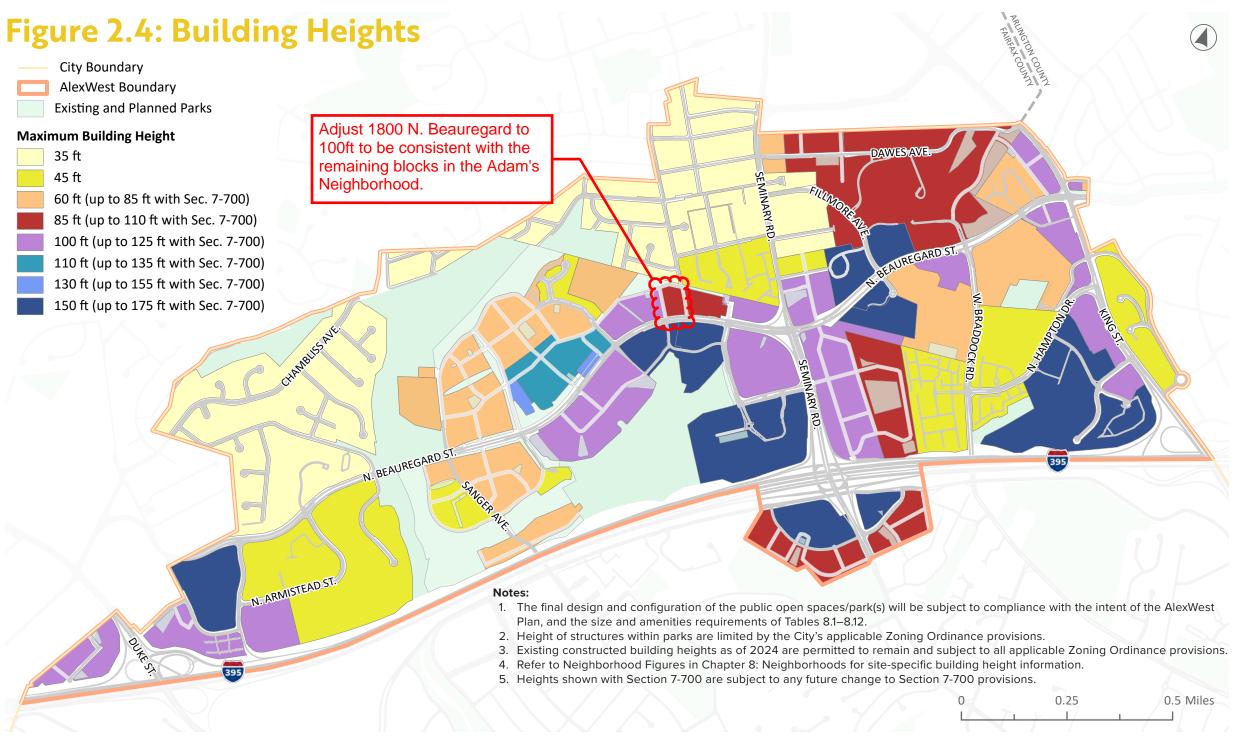
Chapter 8

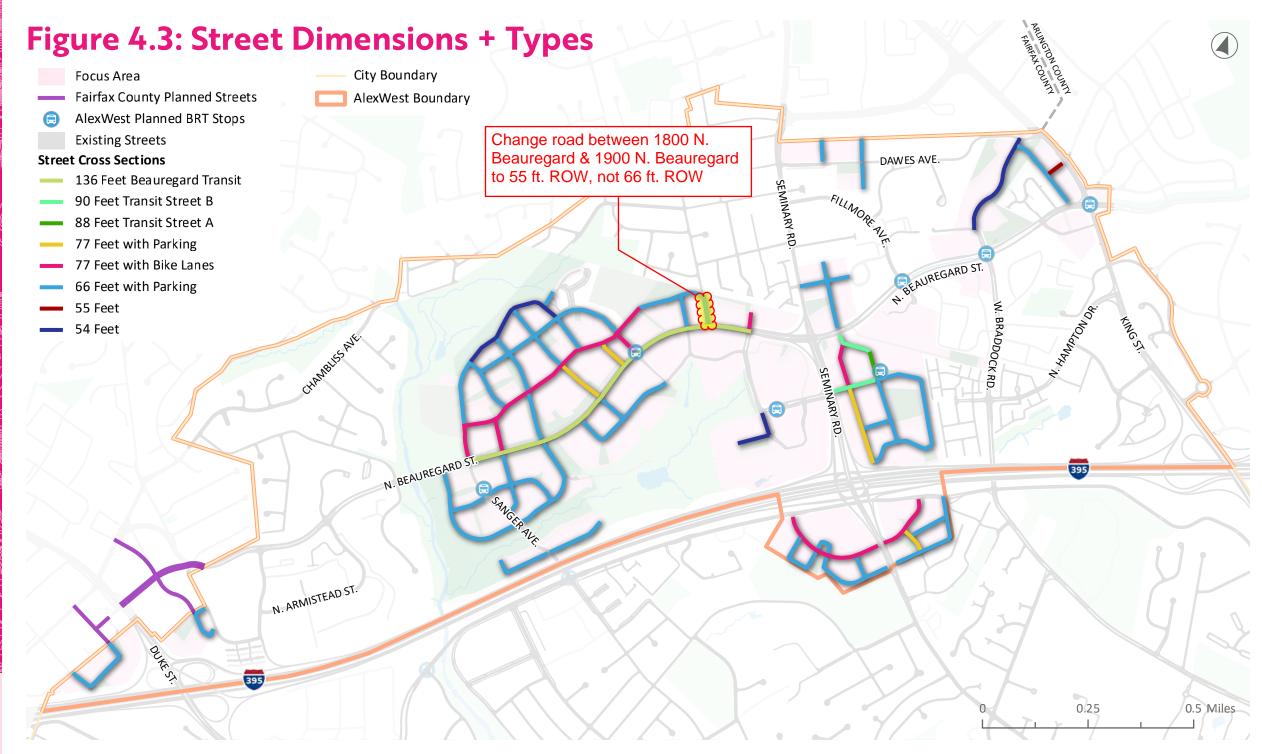
- Page 84 Delete reference to mid-block Pedestrian Connections. [see attached markup]
- See attached marked-up exhibits for comments to Adams Neighborhood, including Table 8.8 and Figure 8.8.
- Table 8.13:
 - Note #2 Need to define a monetary limit to "park amenities" provided as part of each development. Cannot be open ended based on "most current needs assessment".
 - Note #3 Revise language at the end to factor in new dedicated ROW as a percent of site area (see comment to Public & Connected Open Spaces B.44 above).

<u>Appendix – Design Standards:</u>

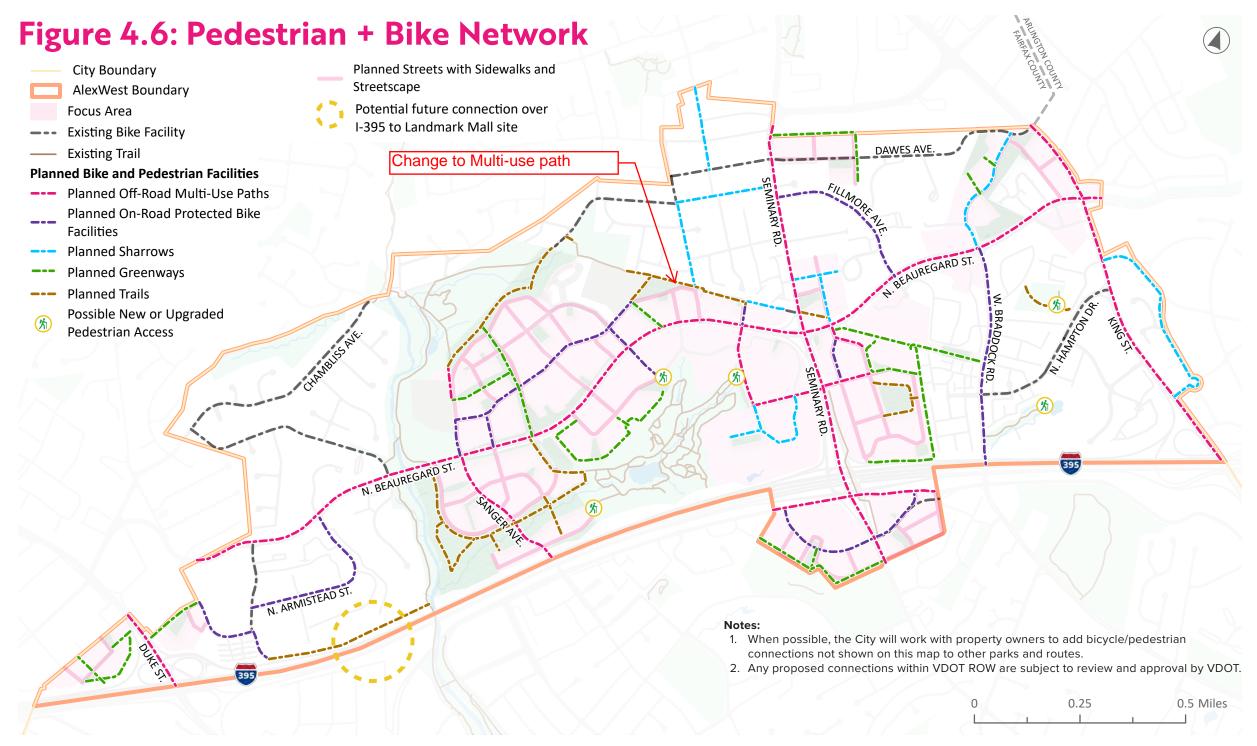
- General statement: the Design Standards ("DS") needs to be changed to "Design Guidelines". As written, the Design Standards are generally vague and create a significant impairment to future development and in many cases jeopardize the viability of any/all development. One of the state principals of the Plan is the creation of new housing yet the Plan is proposing Design Standards that will not only add new artificial restrictions on the number of new units that can be built but will significantly delay the future growth within the Plan Area.
- The Block (#1):
 - DS 1.1 Delete or change to recommendation. Full building breaks at 250 ft. on mid-rise residential buildings with structured parking is not economically viable. It significantly increases costs, reduces building efficiency, creates significant

- operational challenges, reduces the number of units that can be built and not compatible with the state block dimensions of 1,500 ft in DS 1.3.
- DS 1.2 Delete standard. Does not make sense and contradicts 1.1 above.
- o DS 1.3 OK with 1500 ft. blocks.
- Placement & Orientation (#2):
 - DS 2.1 Delete, way too vague as written. Should be a recommendation, not "Standard"
 - DS 2.4 Delete or change to recommendation. Too vague. What is a "Landmark building form" and what are the "prominent neighborhood locations" and "major public open spaces" that require landmark forms?
 - DS 2.5 delete or change to recommendation. In conjunction with DS 1.1 above, this Standard imposes significant economic impairments on new development.
- Height + Scale + Mass (#3):
 - DS 3.1 Should be recommendation, not Standard. A new development should not be penalized for being located in proximity to another building that is the same height.
- Materials + Composition (#4):
 - All representative buildings shown on page 150 are not applicable to the Plan area, very expensive buildings to construct, and all commercial, not residential.
 - DS 4.1 Change language to clarify that facades will need to be comprised of some mix of those material, <u>or similar high-quality material</u>. A development will not have all of those materials on each façade.
 - DS 4.1.a Change to = Fiber cement will be limited to a maximum of 50%, not 20%.
 - DS 4.3 Delete or change to recommendation. Too vague as written. A "high degree of articulation with a focus on creating <u>significant</u> depth between façade elements" is subjective and not a "standard".
- Sustainability (#5):
 - Delete all Sustainability Standards listed.
 - Developments will comply with Alexandria's Green Building Policy as the time they are submitted for review, as already noted multiple times in the Plan. There should not be a second set of sustainability standards for just Alex West.
- Parking (#6):
 - DS 6.2 Delete. If parking is screened from the street, there should not be a requirement for full level of below grade parking. It is not economically viable and is unnecessary.
 - DS 6.6 Delete. Does not make sense and would be a significant economic burden.
- Retail (#7):
 - Should all be guidelines, not standards. Most national retailers have strict storefront design requirements governing the amount of glazing, height, materials, etc., which conflict with some of the stated Standards.
- Open Space (#8):
 - Again, all should be guidelines, not standards. As written, the language is too vague and compliance with the Standards will be subjective.





9



96



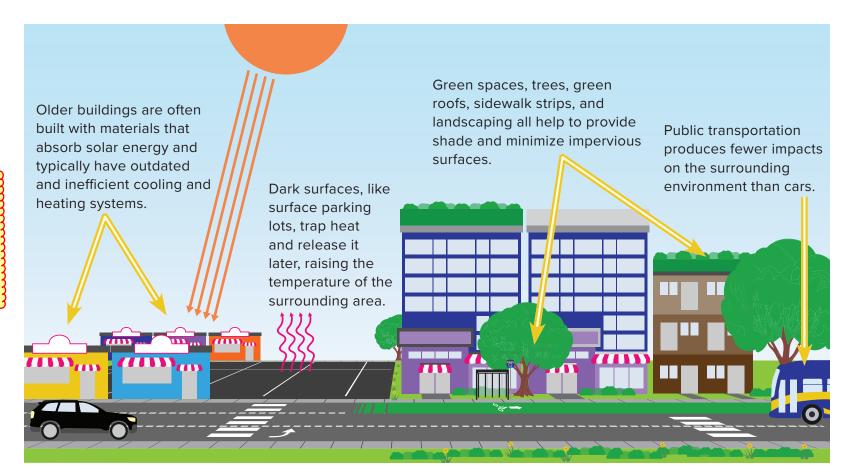
Green Building and Energy Efficiency

All new buildings will meet the City's Green Building Policy standards and zoning requirements for energy efficiency, high-quality building materials, and open space, all of which contribute to both human and ecological health Further, the Plan seeks to take advantage of efficiency opportunities offered by large scale development, recommending the exploration and implementation of district-wide energy systems to efficiently combine building heating and cooling loads to lower energy consumption and overall costs.

Reduced Greenhouse Gas Emissions

Greenhouse gas emissions (GHGs), especially from the transportation sector, are a factor contributing to climate change, resulting in extreme weather events and conditions, such as severe heat and storms. With guidance for the design and development of future buildings and transportation networks, the Plan can influence lower emissions from these sectors, which will result in cleaner air. The Plan's recommendations for safe and easy options for residents to access neighborhood services, amenities, and jobs without the need for a car will help to minimize GHG emissions, benefiting not only residents' health but also their bottom line.

Urban Heat Island Causes + Solutions





Inclusive Growth

A. General

- 1. The overall land use strategy will be consistent with Figure 2.2: Land Use Strategy which depicts the boundaries of the Focus Area, Area 2, and Area 3. Development in these areas will be subject to the intent of the Plan, the Plan Recommendations, and all applicable Plan exhibits, including Table 2.1: Focus Area Criteria and Table 2.2: Area 2 Criteria and Figures and Tables 8.1–8.12 in Chapter 8: Neighborhoods. For the purposes of this Plan, the term "development" refers to new construction and/or redevelopment utilizing the provisions of the Plan.
- 2. Land uses will comply with the land use(s) depicted in **Figure 2.3: Land Uses**.
- City facilities and uses, if provided, may be located within the residential and residential/ commercial land use designations.
- New uses such as warehouses, storage buildings, data centers, and other comparable low activity or industrial uses are inconsistent with the intent of the Plan.

B. Retail

 Retail uses are required in the ground floor frontages in the Required Retail Areas as generally depicted in Figure 2.3: Land Uses and applicable Figures and Tables 8.1–8.12 in Chapter 8: Neighborhoods.

- a. Uses in the Required Retail Areas should have a high degree of pedestrian activity and are intended to prioritize neighborhood-serving retail, including restaurants, personal services, entertainment, food markets and grocery stores, or other comparable uses.
- Retail uses should promote an activated street front.
- Retail uses are encouraged, but not required, in the ground floor frontage in the Encouraged Retail Areas, as generally depicted in Figure 2.3: Land Uses and applicable Figures and Tables 8.1–8.12 in Chapter 8: Neighborhoods.
- 7. The design of retail spaces in the Required and Encouraged Retail Areas will be designed in a manner to encourage neighborhoodserving uses and will be subject to the applicable requirements of the Design Standards, including height, depth, and utility requirements.
- 8. Ground floor retail uses may be provided in other locations outside of the Required Retail and Encouraged Retail Areas in the Plan area, if allowed by the Zoning Ordinance.

9. Interim uses such as community programming, flexible indoor and outdoor public spaces, outdoor dining, community performances, public art installations, cultural activities, farmers markets, parklets, pop-up open spaces, food trucks, and other comparable uses and activities are encouraged.

C. Building Heights

 Maximum building heights will comply with the building heights depicted in Figure 2.4:
 Building Heights. In addition, buildings may request additional building height pursuant to the applicable provisions of Section 7-700 of the Zoning Ordinance.

D. Design

- 11. All development will be subject to all applicable requirements of the Design Standards.
- 12. As part of the development of each block, each full block building will provide internal mid-block breaks and/or pedestrian connections, where feasible, consistent with the Design Standards.

See written comments attached

Mobility + Safety

A. General

- 26. Development will construct the streets, blocks, and connections as generally depicted in Figure 4.2: Street Network as part of development. The location of the streets will be constructed as generally depicted in Figure 4.2, subject to site constraints and compliance with all applicable provisions of the Design Standards.
- 27. New streets in the Plan area will be constructed and dedicated as public streets, unless location-specific issues not addressed by the Plan emerge during the development review process.
- 28. Street designs will adhere to the Street Cross-Sections as outlined in Figure 4.3 - Figure 4.5: Street Dimensions + Types.
- 29. The City will work with property owners and other partners to study and address mobility-related issues at the intersections and in the areas identified in Figure 4.9: Safety Enhancements Study Areas.

B. Pedestrian + Bicycle Network

- 30. Development will provide a network of bike facilities as generally depicted in **Figure 4.6**: **Pedestrian + Bike Network**.
- 31. Development that occurs in Area 2 and Area 3, as depicted in Figure 2.2: Land Use Strategy,

- See written comments

 will implement new pedestrian and bicycle
 connections that link to the network depicted
 in Figure 4.6: Pedestrian + Bike Network.
 - 32. Development will ensure and support access to shared mobility options (e.g., Capital Bikeshare, Dockless Scooters, etc.).
 - 33. Curb cuts, garage entrances, and similar functions are prohibited along designated bicycle facilities and along N. Beauregard Street, Seminary Road, Duke Street, and King Street. This does not apply to curb cuts needed for existing or planned streets.
 - 34. When possible, the City will work with property owners to add additional pedestrian and bicycle connections not shown on Figure 4.6:

 Pedestrian + Bike Network.
 - 33. Development will provide pedestrian connections within development blocks.

C. Safety

- 36. Development will be responsible for providing all necessary improvements and right-of-way for the frontages at the intersection of Seminary Road and N. Beauregard Street to better accommodate and ensure the safety of all users as generally depicted in Figure 4.10:

 Seminary Road + N. Beauregard Street. The City will provide all other improvements.
- 37. The City will explore options for improving safety and accessibility for all users on Seminary Road, from about Mark Center

Drive to Library Lane as generally depicted in Figure 4.9: Safety Enhancements Study Areas.

D. Transit

- 38. As part of multimodal transit enhancements, a new bus/transit facility will be established at the location generally depicted in **Figure 8.5**: **Crossroads Neighborhood**.
- 39. Development will provide all necessary transit access and amenities to mitigate the impact caused by the development.
- 40. The City will coordinate with all applicable transit partners to explore improvements to existing transit operations.

Public + Connected Open Spaces

A. General

- 41. Development will provide an at-grade publicly accessible public park/open space network, as generally depicted in Figure 5.3: Parks + Open Space and specified in the Figures and Tables 8.1–8.12 in Chapter 8: Neighborhoods:
 - a. New public parks/open spaces will be fully accessible to the public through dedication to the City or through the provision of a perpetual public access easement(s) that mirrors access to public parks.

- b. New public parks/open spaces will have multiple publicly accessible entrances and will consist of a mixture of typologies and amenities. All public parks/open spaces in the Plan area will include gathering spaces and be designed, with input from the community, to be interconnected, functional, useable, welcoming, and encourage social interaction.
- c. The final design and configuration of the public parks/open spaces in Figure 5.3: Parks + Open Space will be subject to compliance with the intent of the AlexWest Plan and the size requirements of Figures and Tables 8.1–8.12 in Chapter 8: Neighborhoods as part of the approval of the public open space(s).
- 42. The City will locate a new City recreation center, or similar facility, within the Plan area. City recreational facilities may be located within the public open space recommended by the Plan.
- 43. Improve access to existing public and public easement parks.

B. On-Site Open Space

44. In addition to the publicly accessible parks and open space required in Figure 5.3: Parks+ Open Space, each residential development

- will provide a minimum of 25% on-site open space, including ground-level and above-grade open space. Residential developments that are not required to provide public parks and open space or developments that provide less than 10% as public parks and open space are expected to provide a greater proportion of at-grade open space as part of the 25% requirement.
- 45. In the Garden Neighborhood (see Figure 8.10:
 Garden Neighborhood), where development is allowed to include residential or commercial uses, if the uses are entirely residential, development will provide an additional 10,000 square feet of consolidated public open space within the neighborhood to be consolidated with one of the other planned parks.

C. Public Art + Open Space Programming

- 46. Public art provided as part of development will highlight the cultural diversity of the Plan area. In addition, private art and other comparable forms of artistic expressions are encouraged to highlight the cultural diversity of the Plan area.
- 47. Special events, community activities, and cultural activities in support of the Plan's intent are encouraged within the public parks and open spaces, subject to all applicable City approvals and permits, or as part of the

- approval of public access easement(s) in new public open spaces.
- 48. Interim recreational uses on existing surface parking lots are encouraged if they do not preclude future development envisioned by the Plan.
- 49. Accessory park structures, such as but not limited to restrooms, may be provided within the required publicly accessible open spaces if they are consistent with the City's open space policies and overall intent of the Plan.

Sustainable + Healthy Communities

A. Tree Canopy

50. Development will provide on-site tree canopy consistent with applicable City policies at the time development is submitted for review.

B. Green Building, Energy Efficiency,+ Stormwater Management

- 51. Development will comply with the City's Green Building Policy at the time development is submitted for review.
- 52. Development by large property owners will explore opportunities for the implementation of district-wide sustainability measures and approaches.

Terms Used in the Neighborhood Maps

The Neighborhood Maps include terms that are defined below. In addition to these terms, refer to **Table 8.13: Development Table Notes** as well as the map notes included on each Neighborhood Map.

Delete. See written comments to Design Standards



Tree Retention/ Buffer Areas

A tree retention/buffer area is an area where it is desirable to retain areas of mature trees or natural buffer areas that may contain steep slopes.



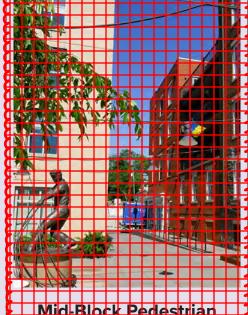
Trails

A trail is a pedestrian pathway that is typically narrower than a greenway and may or may not be paved. Trails are typically located within wooded natural areas and public parks.



Greenways

A greenway is a wide, pedestrian pathway with green spaces on either side of the pathway. In some cases, buildings may be located on either side of a greenway. Sometimes, a greenway may abut a public park or open space.



Mid-Block Pedestrian Connections

connection is a building bredesigned to provide an operand unobstructed pecestric pathway. These connection must comply with the building break requirements and standards in the Design



Streetwalls

Buildings will create a well-defined edge, also known as the building streetwall, that frames and defines the public streets and open spaces. The streetwall provides a sense of spatial definition to enable the street to function as an outdoor room and reinforce pedestrian activity on the sidewalk.



Adams Neighborhood

Change to, "an approximately 2-acre public park..."

The intent of this Neighborhood is to build on the existing John Adams Elementary School. Development will be centered around a new 2.5-acre public park adjacent to the school, and the neighborhood will likely be predominantly residential with an interconnected street network.



With development, a new rectangular sports field can be conveniently located adjacent to John Adams Elementary School.



A network of trails and greenways will help connect the neighborhood and provide access to adjacent neighborhoods.



New buildings and streetscapes will better accommodate pedestrians.

Table 8.8: Adams Neighborhood

Change to 26,500 SF as discussed with Staff and consistent with CDD Amendment submissions

Subarea	Land Use(s)	Base Residential Floor Area Ratio (FAR)	Plan Maximum Floor Area Ratio (FAR)	Base Residential (SF)	Maximum Residential (SF)	Maximum Commercial (SF)	Maximum Building Height ¹ (FT)	Required Public Open Spaces		
								ID	Required Amenities ²	Minimum Size³ (SF)
8A	Residential/ Commercial	N/A	N/A	308,426	308,426	0	100	N/A	N/A	N/A
8B	Residential/ Commercial			0	783,439		85	N/A	N/A	N/A
8C	Residential/ Commercial			0			100	21	-Athletic Practice Cages, Trails, Exercise Play Features	20,000
8D	Residential/ Commercial) 1			N/A	20	Rectangular Field or Diamond Field	112,000
8E	Residential	0.75	2.0	N/A	N/A	N/A	60	N/A	N/A	N/A
Change base density to 1.25 FAR to be consistent with current OC zoning base density.					Chang	ge Max density AR per discuss	cages park o Beaury	re athletic prashown in the n 1600 & 170 egard? There h space and seted.	small Chang discuss is not consist	e to 98,000 SF as sed with Staff and ent with CDD Iment submissions

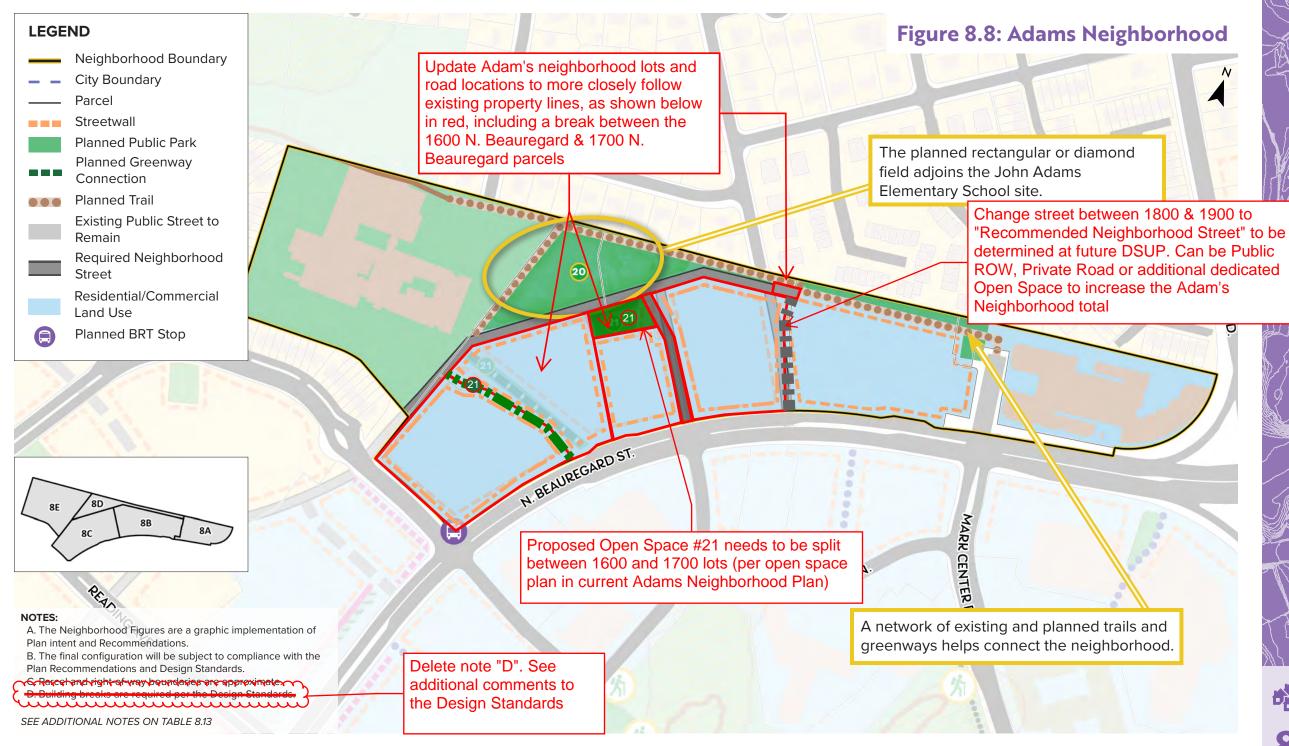


Table 8.13: Development Table Notes

Note #	Note					
1	See Figure 2.4: Building Heights for specific height recommendations.					
2	Park amenities are to be finalized as part of the development review process and will be based on the most current needs assessment.					
3	In addition to the publicly accessible parks and open space required in Figure 5.2, each residential development will provide a minimum of 25% on-site open space, including ground-level and above-grade open space. Residential developments that are not required to provide public parks and open space or developments that provide less than 10% as public parks and open space are expected to provide a greater proportion of at-grade open space as part of the 25% requirement.					
4	For the purposes of this table, the 10% committed affordable housing requirement applies to the residential floor area above the base residential maximum FAR/SF.					
5	Floor Area Ratio (FAR) will be calculated on applicable provisions of the Zoning Ordinance.					
6	In the Garden Neighborhood, where development is allowed to include residential or commercial uses, if the uses are entirely residential, development will provide an additional 10,000 square feet of consolidated public open space within the neighborhood to be consolidated with one of the other planned parks.					
7	For purposes of this table, the table assumes 1,000 square feet per unit for multi-unit buildings, 2,500 square feet for townhomes, and 300 square feet per room for hotels.					
8	City recreational facilities may be located within the open space recommended by the Plan.					
9	The location of the required streets will be constructed as generally depicted in Figure 4.2 and in Figures and Tables 8.1–8.12, subject to site constraints and compliance with all applicable provisions of the Design Standards. The location of recommended streets must be constructed as generally depicted in Figure 4.2 and in Figures and Tables 8.1–8.12, however their final location can be determined during the development review process.					
10	The final design and configuration of the public open spaces/park(s) will be subject to compliance with the intent of the AlexWest Plan, and the size requirements and amenities of Figures and Tables 8.1–8.12 as part of the approval of the public open space(s).					



Evan Pritchard

epritchard@wiregill.com 703-304-0430

July 30, 2024

Via Email

Christian Brandt
Urban Planner
Department of Planning and Zoning
City Hall, 301 King Street, Room 2100
Alexandria, VA 22314
Christian.brandt@alexandria.gov

Re: Comments on Alexandria West Draft Plan

Dear Mr. Brandt:

On behalf of MK Boro LLC and 4700 King LLC, the respective owners of 1700 North Beauregard (Clyde's) and 4660 King Street (the Shoppes at Summit Centre), we offer the following comments on the Alexandria West Draft Plan dated June 25, 2024 ("Draft Plan").

For much of the last year, we have worked closely and collaboratively with Department of Planning and Zoning staff in helping shape the Draft Plan. With the help of our design team, we have had multiple, productive conversations regarding the planning recommendations to ensure that we will be able to successfully redevelop our properties in the future in a manner that is economically feasible and meets the City's objectives for Alexandria West. The critical issue that remains unresolved for us relates to the maximum intensity of 3.0 FAR being contemplated.

Given the size of some redevelopment parcels, including our properties, the costs of construction, and interest rates, limiting intensity to 3.0 FAR will make it extremely difficult for many projects to move forward. This is particularly true given that, unlike in many neighboring jurisdictions, abovegrade parking does not contribute toward FAR. Simply put, achieving the recommended height and building footprints, along with the requisite parking, will be difficult, if not impossible, in many cases. Furthermore, maximizing FAR within the limits of wood frame construction, the most likely product type to be built here, is reasonable. If parking is included as part of this FAR, the proposed 3.0 FAR limit will greatly limit the useable floor area.

We therefore respectfully request that the City consider higher FARS of 3.5-4.5, subject to the proposed height limitations and other recommendations that will limit bulk and massing. Doing so will greatly increase the opportunities for redevelopment, new housing, and attainment of the lofty goals laid out in the Draft Plan.

Thank you for your consideration of our comments. Please let me know if you have any questions.

Very truly yours,

WIRE GILL LLP



Evan Pritchard

epritchard@wiregill.com 703-304-0430

G. Evan Pritchard, Esq.

cc: Joe Mamo, Justin Johnson, Monty Berhane





Revised August 1, 2024 Revised May 22, 2024 March 29, 2024

Jeffrey Farner, Deputy Director Development Division, P&Z 301 King Street, Room 2100 Alexandria, VA 22314

Re: Alex West SAP

Upland Park, CDD #21

Dear Mr. Farner

We are resubmitting this letter for a third time as nearly all of our prior comments have not been addressed and the current draft of the SAP will render the remainder of the Upland Park neighborhood unbuildable for the foreseeable future.

Thank you for meeting with my client, Chris Bell of Hekemian, on March 21, 2024 to review Staff's March 4th Alex West SAP recommendations for Upland Park (the "Property"). Since then, we met with Planning and Zoning Staff multiple times to discuss the impacts on future CDD #21 development density due to the Ellipse removal and the retention of the intermittent stream. Staff and Hekemian discussed that in order to maintain the development footprint and/or density shown in the existing approved CDD concept plan, encroachment into the now retained intermittent stream buffer will occur. To mitigate the impacts of the encroachment, Staff and Hekemian discussed the enhancement of the stream channel as part of the future development. Hekemian requests an acknowledgement in the SAP that in order to maintain the existing building footprint and density development may encroach into the intermittent stream buffer with mitigation through stream enhancement.

We also reviewed the June 2024 DRAFT SAP Plan and attended the April 25, 2024 Alex West SAP, and because recommendations regarding how CDD #21 development would be incorporated into the Alex West SAP, Hekemian continues to have concerns regarding garage floor area and loss of density outlined in our March 29, 2024 letter, and copied below. We have additional concerns regarding the building footprint and the note stating: "Building breaks are required per the Design Standards."

As you are aware, the Property is encumbered with zoning conditions and requirements of CDD #21. CDD #21 was amended with the Phase 1 development of Upland Park to allow for 93,200 SF of office use or 171 hotel rooms; 401 multifamily residential units; 92 townhomes; 8,000 SF of retail; and

8,000 SF of optional retail. The 92 townhomes were approved with Upland Park Phase 1. Phase 2 will include remaining office/hotel, multifamily and retail uses.

Hekemian has been following the Alex West SAP planning process and requests the City to consider the following points and make changes to the Alex West SAP:

- 1. In the Alex West SAP garage floor area counts as density and it did not count with the CDD #21 approval. Based on an initial test, the 3.0 FAR per the "focus area" designation is inadequate to build the development program approved in the CDD. Any FAR established within the Alex West SAP plan must be tested against the CDD approval to make certain there is no loss of density.
- 2. A premise to the Phase 2 development program was that the Ellipse plan would be constructed by the City. As part of this plan, the intersection improvements at Seminary and N. Beauregard Street were substantial. Additionally, and most importantly, the Ellipse improvements that were to be completed by the City would have eliminated the intermittent stream; therefore, there would have been no impacts from the intermittent stream on the development plan on the Property.

As part of the March 4th Alex West SAP recommendations, the City is no longer proposing the Ellipse plan, and N. Beauregard Street and the intermittent stream would not be removed. Because of this new recommendation, the Phase 2 development program cannot be fully realized. The impacts from the intermittent stream are devastating to the development program. The density will be reduced by approximately 94 to 120 units, an impact of almost 30% loss of density. Please see enclosed exhibit.

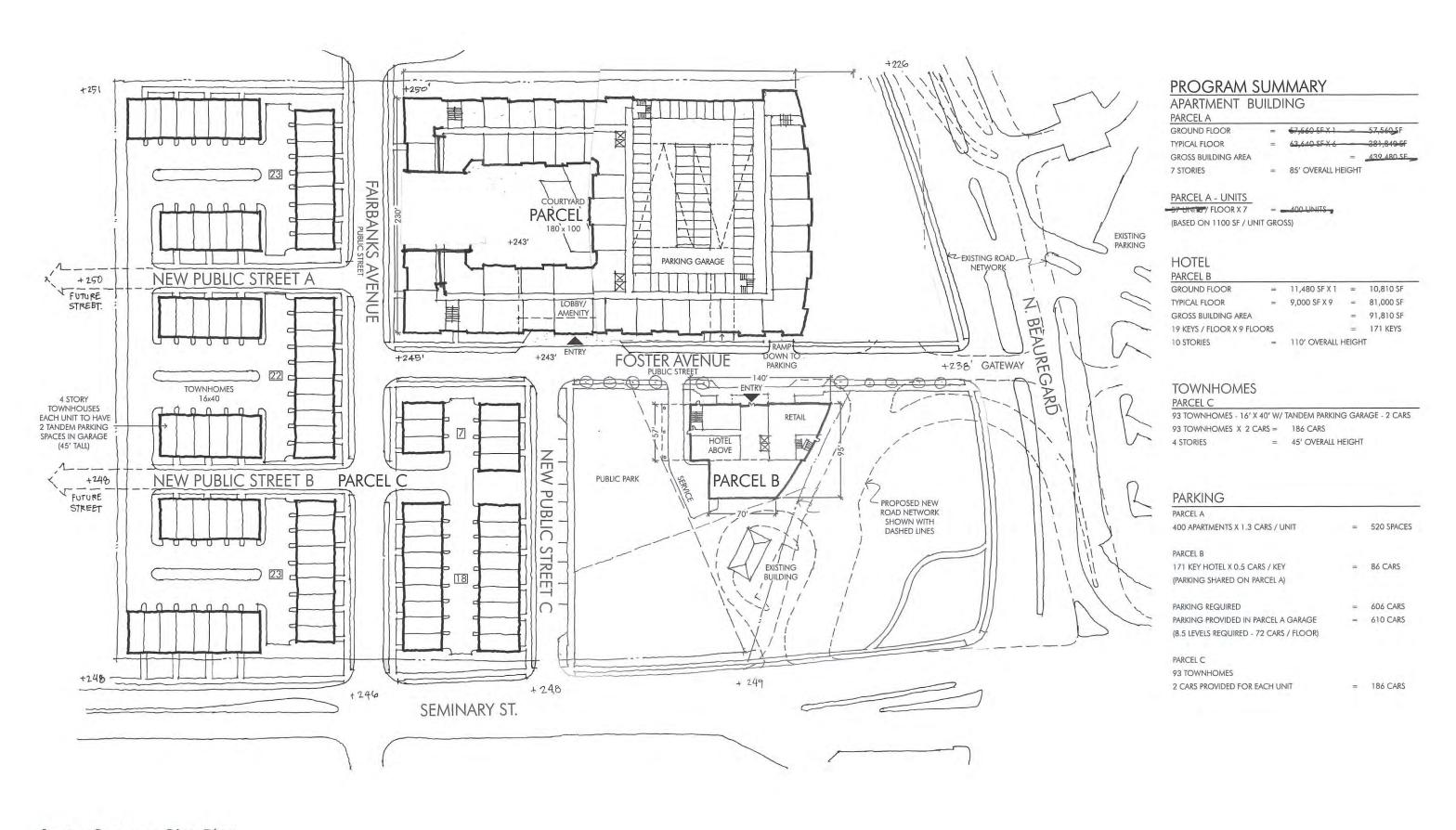
Additionally, creating further constraints, the June DRAFT version of the SAP shows a smaller building footprint than is approved in the CDD# 21 concept plan. The SAP also now requires a full building break for this building. Because of these two new constraints, Hekemian will not be able to construct the building as provided for the approved CDD. Table 8.13 should include a note that permits redevelopment of properties with footprints as allowed for in existing CDD approvals.

In order to build the entitled density in the approved CDD #21, Hekemian requests the City allow for the same development program, building foot print and density including 401 multifamily units to remain on the Property as part of the Alex West SAP. This request may require the City reclassify the intermittent stream, propose a modification, or other mechanism. We recently met with City T&ES staff and they expressed a willingness to allow for encroachment in to the buffer provided that Hekemian make improvements to the stream bed. The Alex West SAP should acknowledge this option in Table 8.13.

Should you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,













www.bctarchitects.com



Alexandria Transportation Commission 301 King Street Alexandria, VA 22314

Phone: 703.746.4025

www.alexandriava.gov

Honorable Mayor Wilson and Members of City Council City Hall 301 King Street Alexandria, VA 22314

June 20, 2024

Re: <u>Transportation Elements of Alexandria West Small Area Plan Update</u>

Dear Mayor Wilson, Members of City Council, and Members of the Planning Commission:

At its June 20, 2024, meeting, the Alexandria Transportation Commission reviewed the Alexandria West Small Area Plan's draft transportation recommendations. The Commission moved to **endorse the recommendations in the plan as consistent with the Alexandria Mobility Plan (AMP)**.

The Transportation Commission:

- Supports the enhanced, interconnected, and gridded multimodal street and path network depicted in the Plan, but also
 - suggests that some refinement to drawings would ensure consistency in the networks depicted across the plan area, helping to avoid confusion or misunderstanding during implementation.
- Supports the Plan's commitment to safety studies at critical intersections and corridors in the Plan area, but also
 - o suggests that the Plan be more explicit about how street and transit access design will improve the lived experience of residents, making their options safer and more convenient. Comparison between current access conditions and the future proposed condition could be helpful in this regard.
- Applauds how the Plan builds upon the West End Transitway by promoting density along the alignment of the route, but also
 - o suggests the final document should unequivocally describe an effective West End Transitway as critical to the Plan's success.

The Transportation Commission was created by Council to advocate and promote the development of balanced transportation systems in the City through oversight of the implementation of the Transportation Chapter of the City's adopted Master Plan. Our endorsement action is conducted in fulfillment of this oversight obligation.

The Commission appreciates your consideration of its input on this project, and we look forward to the implementation of the Alexandria West Small Area Plan Update.

Sincerely,

Melissa McMahon

Chair, Alexandria Transportation Commission

cc: Alexandria Transportation Commission

City Manager James Parajon

Adriana Castañeda, Director, T&ES Hillary Orr, Deputy Director, T&ES

Christopher Ziemann, Division Chief, T&ES



Honorable Mayor Wilson and Members of City Council City Hall 301 King Street Alexandria, VA 22314

August 6, 2024

Re: Sustainability Elements of Alexandria West Small Area Plan Update

Dear Mayor Wilson, Vice Mayor Jackson, Members of City Council, and Members of the Planning Commission:

At its June 2024 meeting, the Alexandria Environmental Policy Commission reviewed the draft Alexandria West Small Area Plan sustainability elements. The Commission moved to endorse the recommendations in the plan as consistent with the City's Environmental Action Plan.

The EPC commends the Alex West Small Area Plan update for its thorough consideration of recommendations and actions in line with the goals of the EAP. Sustainability features the EPC finds valuable in the AlexWest SAP include the following, and we recommend these strengths be applied across all future land use plan updates in the City:

- Reduced Greenhouse gas emissions and Increased energy efficiency
 - New bike, pedestrian, and street connections to increase multimodality off-road and onroad bike paths, trails, as well as BRT stops
 - o Compliance of new buildings to meet current Green Building Policy, resulting in lowered building emissions
 - O Commitment to highest and best land uses by highlighting opportunity to increase building heights thus increasing density instead of encouraging sprawl
 - o Encouragement to explore district-wide sustainability measures and approaches
- Increased Resilience
 - o All stormwater management to be done onsite and not add to current capacity
 - o Green infrastructure increased tree coverage for shading, stormwater BMPs, preservation, with minimum open space development requirements for new development.
- Climate Equity
 - Redevelop surface parking lots with urban heat island effect, which disproportionately affects communities of color to replace with new developments, which also reduces existing resident displacement
 - Commitment to housing affordability through affordable residential development targets, encouragement for developers to explore available strategies to maximize affordable options, authorization of bonus density incentives in the Focus Areas.
 - Equitable access to new and existing network of parks, including potential Winkler Preserve new pedestrian access points

While the EPC favorably recommends the Alexandria West Small Area Plan, the Commission would like to highlight opportunities to maximize the positive environmental impact, consistent with EAP targets, through the additional iterations and/or implementation of the plan, to include:

• Provide incentives or more clear targets to facilitate districtwide sustainability measures and approaches for the development of large property owners.



Environmental Policy Commission

- Eliminate or reduce parking minimums for new development near transit, especially for infill development projects on existing parking lots.
- Prioritize transportation options that reduce vehicle miles traveled, increases accessibility, and improves efficiency of multi-modal transit, to include dedicated bus lanes, separated bikes lanes, and pedestrian scale routes along key corridors (e.g., shopping centers, schools).
- Expand required/encouraged retail areas, as appropriate, to enable a live-work-play SAP that requires less vehicle miles traveled for residents conduct their daily activities.
- Encourage all surface parking lots to have solar panel canopies that reduce heat island effect and increase renewable energy generation
- Consider measurement and reduction of embodied carbon in building materials and infrastructure materials
- Encourage healthy building certifications for new buildings (e.g. WELL, Fitwel, RESET Air) to improve indoor air quality and overall occupant health
- Ensure existing and new development is built to withstand and recovery from the impact of future hazard events (to include heat wave, drought, and extreme weather events), by incentivizing and requiring where possible specific resilience measures, such as alternative energy capture and battery storage, encouraging development consistent with advanced or resilient building codes, on on-stie stormwater management and capture, gray/black water systems in large scale developments, and other strategies to protect Alexandrians from future conditions.

Small Area Plan updates are a critical mechanism for the City to shape the built and natural environments for the next generation. The EPC recommends that the City of Alexandria ensure all Master Plan and Small Area Plan updates take bold actions to help meet or exceed targets identified in the EAP2040 and ECCAP. This SAP update also presents an opportunity to flag the prior EPC/Planning Commission recommendation from a joint letter in January of 2023, where we expressed our concerns for rapid and effective updates to development approval processes to meet Alexandria's 2019 Declaration of Climate Emergency commitments and Environmental Action Plan (EAP) 2040 targets. Particularly relevant is our recommendation regarding Master Plans and Small Area Plans:

The Master Plan and most Small Area Plans do not adequately address or include reference to community environmental goals/targets. Use the existing amendment process and current planning process such as the Alexandria West Small Area Plan and others to:

- A. Establish a mechanism by which EAP2040 GHG reduction targets and Climate Emergency Declaration commitments become binding on new development.
- B. Require developers to submit an Action Plan for Carbon Neutral Buildings by 2030 and Carbon Neutral Sites by 2040 to achieve GHG emission targets and Climate Declaration commitments. The plans should consider funding available from the federal Inflation Reduction Act of 2022 and other funding streams.

Further, the EPC recommends that all future Master Plan and SAP updates include:

- Building and Site Design that apply net zero requirements under the Green Building Policy, targets net-zero carbon emissions and all-electric buildings, reduces heat island impacts and maximizes tree canopy, emphasizes land use that prioritizes open space and pedestrian scale development, and integrates stormwater management best practices.
- Promotion or incentivization of reasonable on-site alternative energy production to include solar panels, geothermal, energy storage, grid-interactivity and demand response.



Environmental Policy Commission

- Transportation elements that prioritize multi-modal transit and electric vehicle infrastructure, to include dedicated bus lanes, protected bike lanes, on-site and neighborhood EV charging.
- Commitment to social equity to include maximizing contextual and allowable height and density bonuses to facilitate affordable housing availability

The Commission appreciates your consideration of its input on this project, and we look forward to the implementation of the Alexandria West Small Area Plan.

Sincerely,

Marta Schantz

Mr 824

Chair, Alexandria Environmental Policy Commission

cc: Alexandria Environmental Policy Commission

City Manager James Parajon

Andra Schmitt Melissa Atwood Karl Mortiz

Ryan Freed



Park & Recreation Commission

Department of Recreation, Parks & Cultural Activities

1108 Jefferson Street Alexandria, Virginia 22314

August 13, 2024

Honorable Mayor and Members of City Council City of Alexandria 301 King Street Alexandria, VA 22314

RE: AlexWest Draft Small Area Plan

Dear Mayor Wilson and Members of City Council,

On behalf of the City's Park and Recreation Commission, we are writing to express our support for the AlexWest Draft Small Area Plan released by the City in June. The plan addresses a number of issues critical to ensuring residents have ready access to open space, recreation facilities, and other amenities that improve quality of life. This Small Area Plan was highlighted for an update by City staff and the Council in the FY 2023 Long-Range Planning Interdepartmental Work Program, and one of the primary areas of interest to the Commission is the proposed improvements to open space and recreation facilities.

The AlexWest Small Area Plan will increase the number of parks and open space areas, as well as make sure that all residents can reach one of these areas within a 10-minute walk of their home. Existing resources in the areas are significant -- 132 acres of publicly accessible parks - but easy access from the surrounding neighborhoods is not. Currently, 23% of residents living in the area are outside of this 10-minute radius. In the development of this plan, an emphasis was placed on increasing access points and making sure that city spaces and amenities are more evenly distributed. This represents effective and efficient use of City resources, and City staff should be commended for their significant efforts to provide equitable access to open space. In addition, the city did extensive outreach with the community and continues to receive and respond to feedback on the website.

Certain items in the plan should be prioritized. This includes the need for an additional recreation center that is open to community use during school hours. The only recreation center currently in Alexandria West is William Ramsay which is unavailable during school hours. The City should also increase the network of trails and other pedestrian- and bike-friendly routes that connect the existing and planned parks and open spaces, and upgrade access points to ensure all users can take advantage of them. The plan calls for new parks and open space, and we encourage the City, through the planning process, to

incentivize developers to also improve access to existing resources and create even more open space and recreation resources as part of the development approval process.

Lastly, as the City is about to embark on updating the Environmental Action Plan, we urge a renewed focus on cataloguing the existing tree canopy and taking every opportunity to increase the number of native trees in the City. This could include adding trees to existing open spaces, but the priority should be to plant native trees as part of new open space development and throughout the plan area. As you know, increasing the urban tree canopy has demonstrable environmental (reducing the urban heat island effect, improving air quality, and reducing stormwater runoff), economic (increasing property values), and social (adding shade to improve open space recreation areas) benefits.

The Commission encourages City Council to adopt the AlexWest Small Area Plan and to continue to look for ways to further improve open space and recreation resources in this growing area of our City.

Please do not hesitate to reach out to the Commission if we can further advise on this issue.

Sincerely,

Dana Colarulli, Chair

Park & Recreation Commission

Geoffrey Goode (Aug 14, 2024 17:57 EDT)

Geoff Goode, Planning District II Park & Recreation Commission

cc: Park & Recreation Commission members

James Parajon, City Manager

Emily Baker, Deputy City Manager

James Spengler, Director, Recreation, Parks & Cultural Activities

Jack Browand, Deputy Director, Recreation, Parks & Cultural Activities

PRC Alex West Letter of Endorsement August 2024

Final Audit Report 2024-08-14

Created: 2024-08-13

By: Wilma Newby (wilma.newby@alexandriava.gov)

Status: Signed

Transaction ID: CBJCHBCAABAARq0QV8ahT8XV-mCWz5uabwxejKjlJpyJ

"PRC Alex West Letter of Endorsement August 2024" History

- Document created by Wilma Newby (wilma.newby@alexandriava.gov) 2024-08-13 9:08:14 PM GMT
- Document emailed to Dana Colarulli (danacolors@gmail.com) for signature 2024-08-13 9:08:18 PM GMT
- Email viewed by Dana Colarulli (danacolors@gmail.com) 2024-08-14 8:11:48 AM GMT
- Document e-signed by Dana Colarulli (danacolors@gmail.com)
 Signature Date: 2024-08-14 9:34:33 PM GMT Time Source: server
- Document emailed to geoffrey.goode@gmail.com for signature 2024-08-14 9:34:35 PM GMT
- Email viewed by geoffrey.goode@gmail.com 2024-08-14 9:34:43 PM GMT
- Signer geoffrey.goode@gmail.com entered name at signing as Geoffrey Goode 2024-08-14 9:57:15 PM GMT
- Document e-signed by Geoffrey Goode (geoffrey.goode@gmail.com)
 Signature Date: 2024-08-14 9:57:17 PM GMT Time Source: server
- Agreement completed. 2024-08-14 - 9:57:17 PM GMT