

Wednesday, September 8, 2021

Via email:

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



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

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

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

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

¹ The Economic Opportunities Commission Alexandria Community Needs Assessment, 2019, at 6-7, available at: https://www.alexandriava.gov/uploadedFiles/dchs/WebBoxes/EOCNeedsAssessmentReport2019_v2.pdf.

² Arlandria Income and Population Survey and Findings, July 2019, at 4, available at: <https://d3n8a8pro7vhmx.cloudfront.net/newvirginiamaority/pages/152/attachments/original/1563402865/FinalArlandriaAmazonHousingReport.pdf?1563402865>

³ Id.



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

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

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

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

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

⁴ The Economic Opportunities Commission Alexandria Community Needs Assessment, 2019, at 2, 4.

⁵ Arlandria Small Area Plan Presentation, June 22, 2021, available at:

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

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

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



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

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

Sincerely,

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⁷ Department of Housing and Urban Development: Office of Fair Housing and Equal Opportunity, Frequently Asked Questions: Interim Final Rule: Restoring Affirmatively Furthering Fair Housing Definitions and Certifications, July 14, 2021, at 5, available at: https://www.hud.gov/sites/dfiles/FHEO/images/Frequently_Asked_Questions_7_14-21.pdf.