

June 16, 2023

Via Email

To:

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Helen McIlvaine, Director of Housing, Helen.McIlvaine@alexandriava.gov

Re: AlexWest Small Area Plan

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

We, Tenants and Workers United and Legal Aid Justice Center, write to comment on the AlexWest Draft Plan Objectives. Thank you for meeting with us and taking our feedback into account in the planning process. Our comments reflect the concerns we have heard from our members and clients, who are working class people of color living in the West End.

Our principal concern is that the Draft Plan Objectives do not sufficiently focus on anti-displacement protections. We are concerned that the City is not prepared for the likely displacement impact of redevelopment in the West End because we do not see enough tools and resources in place to protect and preserve existing communities. The objectives thus far appear to be responsive to redevelopment interests, instead of community concerns about displacement. We urge Planning and Zoning to account for the risk of displacement and severe lack of deeply affordable housing, including through the following steps:

- We urge Planning and Zoning to conduct a displacement risk and impact assessment to gather critical information on the West End, prior to finalizing the plan objectives.¹ With this assessment, the City can evaluate any potential impacts or risks of policy decisions as part of the Small Area Plan process. The City should then create a comprehensive anti-displacement policy plan in response to the assessed risk. We also urge the City to increase legislative advocacy to permit additional anti-displacement policies, preservation measures, and tenant protections.
- The City should ensure this plan will not empower corporate landlords, including many existing West End landlords who profit off working-class tenants by charging high rents without guaranteeing livable conditions. The plan should empower and protect residents from exploitative practices.
- We also acknowledge that increasing housing supply across the board will not make our current housing system work for our lowest-income neighbors. To prevent displacement and guarantee affordable housing, we need a large increase in housing units for families who earn 40% of the Area Median Income (AMI) and below. While the City has not yet proposed a target requirement for affordability for new development, a bonus density of

¹ We have attached a memo with preliminary research on displacement risk assessments to this letter.

10% of additional units is not enough to meet the need. Additionally, the City should prioritize providing deeply affordable housing as a condition or community benefit for new or re-development.

- One critical way the City can increase housing for families who earn less than 40% AMI is to significantly increase budget allocation for deeply affordable housing. The City should guarantee additional funds before it makes policy changes to allow increased development, so that it can build more deeply affordable housing on par with other housing.
- When considering opportunities for deepening affordability, the City should move beyond exploring or studying opportunities, and establish and fund programs for long-term, deeply affordable housing such as cooperatives or community land trusts.
- The City should ensure that the Alex West planning process is coordinated with the City's Zoning for Housing and Housing for All Processes. The City should strive to increase affordable housing and general housing supply equally across the whole City, not only in the West End.
- We hope the City can recognize that online tools for public participation in the planning process continue to pose barriers to many low-income, working class residents of the West End. We advocate for the City to proactively reach out to residents and meet them where they are in order to capture their feedback.

We advocate for the City to slow down the planning process to ensure that the most marginalized West End residents are heard, and that there are sufficient tools and resources in place to protect them from displacement, before large scale changes go into effect. We hope you can take our recommendations to that effect into consideration.

Sincerely,

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