

MEMORANDUM

March 27, 2024

TO: Christian Brandt, Jose Delcid, Jeff Farner, Andra Schmitt; P & Z
CC: SWCA Board, Gus Ardura
FROM: Owen P. Curtis, President, SWCA
RE: Comments on the Draft Recommendations for the Alexandria West SAP

Various members of our community have reviewed the documents posted on the project website after the March 4 meeting. This memo presents our Association's comments on what we heard on March 4 and on what we have since reviewed. Given the volume of information, I suspect we could provide a lot more feedback and insight, but for now, we will share with you our chief thoughts and concerns.

General

1. First off, there is a sense that, while we were not happy with how the City chose to go about this planning exercise, there is much in the draft that reflects that staff did listen to the community on a number of issues. Thank you for that.
2. This round of the AWSAP had to update the 1992 SAP and yet provide some degree of consistency with all that was promised to the development community in the rather disastrous 2012 Beauregard Small Area Plan. In general, this draft shows a sensitivity to the community of trying to minimize further expansion of the density of development in the BSAP. We would have preferred, of course, rolling back some of that which was given away in the BSAP, but we understand that ship has sailed.
3. The overall concern of a residential community like SWCA at the edge of a much higher density area is that the spillover of impacts of that higher density area not adversely impact the high quality of life -- tree canopy, open space, setbacks reflective of suburbs or small towns and not urban areas, walkability, transit accessibility - that we treasure and that need to be preserved by this plan. Our specific comments will flag where the draft threatens those values or others important to our community.
4. It is hard for the average citizen to grasp exactly what role a Small Area Plan plays in defining the future of our community. A fair bit of feedback from our members reflected the concern that the draft recommendations lack specifics and are vague. The concern is that if the SAP does not specifically state that something is protected or is to be in certain form, then when a developer brings forth a proposal, they will argue that their concept fits within the vagueness of the SAP. We look forward to more discussions with you along these lines. We understand that a plan has to have

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some degree of flexibility as things change over the plan's life of a decade or so, but we hope that it can include certain constraints or definitions that protect the essential, timeless features of SWCA and Alex West overall.

01. Land Use

1. A.2 speaks of "city facilities." That term is vague, and if it includes things like a bus facility or transfer station, et al, then it would be problematic to have these in residential locations. Is this a euphemism for a school or park? Please clarify.
2. B Retail tends to move away from the small shopping center concept to ground-floor retail only. Our concern is that where we see ground-floor retail elsewhere in the City or No VA, it is in very urban form, with very close setbacks (curb/sidewalk/building entrance), and no sense of the suburban and small-town nature of most of Alex West, which has always been pleasant due to a much greater sense of openness in the public right-of-way and on commercial/retail properties. We fear development similar to the Mosaic District/Merrifield, or Pentagon Row, which would be anathema. What can be done to ensure a mix of the type of retail we have today and ground-floor retail that conforms with our "open" characteristic?
3. The retail location shown as part of the Focus Area where the Coca-Cola plant currently is seems to be an isolated parcel or two that will not relate to what is around it. Adjacent are townhouse offices, residential townhouses, a very open campus of NVCC, and two-level flex-space retail over the County/City line at Build America. The height and nature of what is proposed here just doesn't fit into that area. Moreover, this is one of the several important entrances to the City and our community, so a tall residential building with ground-floor retail doesn't strike us as a welcoming sight. A mix of townhouse and/or garden apartments with retail seems more of a fit with the surroundings.
4. Building heights under this plan are a significant concern. Several locations are most notable:
 - a. Allowing more height on top of the existing Southern Towers apartments is overkill. Along with the idea that the parking lots be deemed developable land, the heights would give the Southern Towers area a very urban density. This level of development would totally change the character of the area, which is the gateway to Alexandria West.
 - b. The same goes for higher density along Beauregard. The new master plan would permit taller buildings like the Blake all the way along the parcels that adjoin our SF homes. The Blake has proven to be a disaster, cutting off light and air, located much too close to existing homes, and lowering their values. To continue such development and heights where 1500-1900 N Beauregard now sit significantly impacts our neighborhood. We encourage a reconsideration of heights, and the density (FAR) and setbacks to minimize how redevelopment at these locations will impact the folks who for decades have adjoined heavily treed parking lots.

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02 Housing

1. We appreciate the preservation of the many single-family neighborhoods in the plan. We hope that the Zoning for Housing changes recently approved do not make retaining SF areas meaningless.
2. The chief concern we have with this section is that it doesn't seem to emphasize preservation of existing affordable housing. We do understand that due to the way our state constitution is written (the Dillon Rule) and the priority it gives to the primacy of private property, the City has its hands tied in several respects. Nonetheless, we encourage staff to state that the intent of the plan is to preserve what exists today, and that developers who intend to destroy such housing and replace it with higher cost (and higher value) housing will be developing counter to the intent and desire of the City and its residents.
3. Does this section need to get specific about how housing relates to urban form? In particular, recent housing developments in our neighborhood have totally changed the urban form of Alex West, from well-set-back buildings and a treed public ROW to a dense, urban form that cramps and crowds, and, frankly, is ugly. I mention St. James Place and the adjacent townhouses, the Spire, and the Blake, among others. The developments at the corner of King/Beauregard are mixed use, not solely housing, but they, too, are far too close and dense, and have greatly and adversely impacted the appearance of Alex West. **Please, let this SAP be clear that one of its overall objectives is to preserve the open character of Alex West, and its tree canopy.**

03 Mobility

1. It appears that the plan for a roadway west of (behind) 1900 N Beauregard, adjacent to our neighborhood, has been removed. Thank you. We look to a continuing dialogue such that a trail or pedestrian way also fits reasonable criteria as a good neighbor to those whose homes abut that location.
2. There is a street network in the area of the Mark Center Shops and the adjacent garden apartments that is shown as Beauregard CSS/SAP Approved Streets. A street network makes sense if/when that area is developed. We are however, very concerned about the portion of that network that abuts the Dora Kelley Nature Park. That area would be behind whatever housing is to replace the garden apartments, and we see no need to bring traffic or even pedestrians and bikes along the ridge above the sensitive preserve. We encourage a rethinking of that proposal. The sights and sounds of the DKNP will change with this development; it is up to this plan to ensure that changes to the park are positive, and not negative.
3. There seems to be a fair bit of vagueness about some of the mobility recommendations (e.g., 03.A.24). T&ES explained to some of us in a meeting that this is because the transportation study done for the SAP was very high level, and did not get down to the level of detail that would facilitate more specific recommendations. It is essential, we believe, that the City be very clear in its communications with the public about this point, and that the City provide a general sense of when such additional studies will be done, and how the public will

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- be part of the study process, and the planning and design of recommendations that follow from any studies.
4. Please add the intersections of Seminary Road with Dawes, Fillmore, and Echols Avenues to the list in Figure 5 of Mobility Enhancement Study Areas. In our recent meeting with T&ES we learned that all of Seminary Road from Library Lane to the City line is to be studied, once funding and cooperative agreements fall into place. It is essential to our members' concerns about Seminary Road west of N. Beaugard that they all recognize the City's intent to deal with these issues. Putting such markers on a map helps you tell that story clearly, and increases citizen confidence that their government is listening.
 5. There is a proposed bike trail that appears to connect from the end of Chambliss Street near the tennis courts along the stream valley, which flows from there down to Holmes Run. There already is a trail up the hill just northwest of that small stream, which connects again to the short block of Chambliss Street at the end of Doris Drive. If we are interpreting Figure 6 correctly, we see the proposed trail as highly problematic. First, its construction would damage a significant portion of DKNP, especially since it would be on such a steep hillside. The stream valley is accessed very little compared to much of DKNP, and thus serves as a refuge for wildlife and the flora along the bank. Bottom line: the proposed trail is duplicative and unnecessary. Please take it off the plan. It works counter to the plan's objectives related to parks and open space.
 6. The conceptual enhancements to the intersection of Seminary & Beaugard are troubling in that they appear to address pedestrian safety issues (thank you!), but without due consideration of operational concerns there, which give rise to many of the safety concerns. We firmly believe that the one cannot be achieved without the other - both safety and operations need to be improved in a coordinated manner. We have expressed our concerns to the City over several months that the findings of the studies at Seminary & Beaugard seem clearly to have mistaken the traffic flows, as they show heavy volumes, high delays, and long queues on Beaugard and not Seminary, when in fact those issues plague Seminary and NOT Beaugard. In a meeting last week with T&ES, they explained that any real proposal for changes to Seminary & Beaugard would require a much deeper study, so what is shown in this plan is not meant to be "the answer." If so, we urge you to state that clearly in the plan, and clarify that the objective is to find a solution that improves safety without further deterioration of operations.
 7. The Ellipse seems to have been removed, and we thank you for that change.
 8. D.35 needs to be changed to reflect the criticality of improving Seminary all the way west to the City line. Yes, the short-term study will include Mark Center to Library Lane, but in the broader perspective, that study will inevitably recognize that a fix for that short segment requires a comprehensive understanding and analysis of how Seminary Road west of Beaugard influences/determines how the shorter segment operates, and vice versa. **Please restate this recommendation to read "for all users on Seminary Road from Library Lane to the City/County line."**
 9. The section on Transit is very vague, and shows and shares little about the proposed West End Transitway, which has the potential to severely impact our community. There is no justification for the need of such a Transitway, nor a description of it. All we see are the proposed BRT stops.

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10. The BRT proposal, as we understand it, would create a two-lane facility in the center of N Beauregard from King Street to Sanger, with some diversion off Beauregard through Southern Towers and Mark Center Drive. Beauregard today is a great asset for Alex West, as a treed and green “boulevard” except where recent development (The Spire, The Blake) have ruined that character. The treed median would be gone, and the tree-lined portions on one or both sides would disappear as well. The huge cross-section of 6 to 8 lanes would be a safety issue and a traffic control issue, especially at the school crossings. There are three elementary schools along this segment of Beauregard, and a fourth is moving in as swing space within the next 3 to 10 years. It is ridiculous to ruin this attractive corridor and make it less safe for a modest savings of travel times, which is the only claim that BRT proponents are making.
11. Our members want to know more details on the BRT, and fear that by not stating enough of the aspects of this BRT idea in the SAP, we will get stuck later with things that should have been resolved in the context of the whole SAP. Some questions include
 - a. Will there continue to be a bus stop at the Mark Center Shopping Center?
 - b. Where, specifically, will the proposed new bus facility be located?
 - c. How will that facility relate to the DoD transit center at the BRAC site on Mark Center Drive?
 - d. What is the City’s position on locating the new bus facility on the Southern Towers property at the intersection of Beauregard and Seminary? How will it flow through those parking lots?
12. The SAP calls for reducing the number of stops along Beauregard from King Street to Sanger Avenue from 10 stops to 4 stops. This will have a very adverse effect on people who rely on transportation to shop and commute to work. At the March 4 meeting, staff dismissed those concerns, saying there is a “balancing act” between convenience and speed, and the focus here is on speed. Speed isn’t going to do anyone any good if they have to lug shopping bags four or five blocks instead of one block. The folks adversely impacted by this BRT concept are transit-dependent, and we doubt they understand what is coming their way, and it is unlikely they would be in favor of it. As a city with heart, we owe these folks more than what once was to some idealists a progressive, urbanist idea. Short walks, frequency of service, and variety of destinations are the measures by which we all should judge the quality of transit service.
13. Moreover, when considering a modal choice, studies have shown that it is total travel time (door-to-door), not just in-bus time, that matters. Indeed, in-bus time is the best time, compared to walk time to/from the stop, and wait time. So the BRT would make ride time better, yet greatly increase walk time, and do nothing about wait time. **Bottom line: we urge the City to scrap the BRT plan (especially in light of the significant land use changes that have come about since this plan was conceived before the pandemic), and instead begin an interactive planning process with our community and especially the residents along the Beauregard corridor, many of them transit dependent, to better understand what, if anything, needs to be revised in terms of transit service and facilities in Alex West.**

04 Public Parks and Open Space

1. The SAP is a positive step towards more open space. We support the increase in park land suggested. Dora Kelly would gain a wide green strip in the event that Morgan Properties or someone else decides to knock down the existing buildings and create a new buildout. And there is a significant increase in parkland or green space added to the current Lynbrook apartment complex along the south/east side, widening the buffer with 395.
2. The only concern is whether despite what is included, is it enough to keep up with the eventual population of Alex West? At the March 4 meeting, a Parks staffer essentially said “yes, it is.” But if we heard him correctly, the standard the City uses is based on population, and not on density. If all the population lived in SF homes on 0.25 acre lots, they would use their yards a lot, and consequently need less city open space and parks than those same residents would if they all lived in high-rise apartments with essentially no open space, yard, et al, for recreational use. In contrast to the center areas of our City (North Ride, Seminary Hills, et al), where nearly everyone has their own yard to play in, most of the Alex West population is fully dependent on the City to provide a yard, a playground, a field, and simply green areas for walking and contemplation. We urge that this plan not be finalized until the Parks staff can meet with us and discuss whether they are using the correct metrics to calculate the need for parks and open space in Alex West. We believe they are not.

05 Sustainability, et al

1. The Seminary West area has lost significant tree canopy in the past 20 years, and we greatly fear a continuing loss. The reason is that the City code simply permits far too much destruction of the existing canopy when a lot is redeveloped. Some of the examples that distress us include:
 - a. The Blake - 100% loss of the entire tree canopy (several hundred mature hardwoods)
 - b. The Spire - same thing
 - c. St. James Place - same thing, a loss of 3.2 acres of mature hardwoods
 - d. a dozen tear-town and replacement SF homes on Rosser, Fillmore, Seminary, et al, over the past two decades, where only 2 to 4 trees on the rear lot line survived, and with a total loss of any tree canopy along the street. Most of these new homes are McMansions (most built by the same small developer), which are totally out of character with the neighborhood, but the City nonetheless permitted their development, and we are all the worse off because of it.
2. Our point is that the SAP is not strong if it only says “follow the City’s rules about tree canopy.” The rules are wholly inadequate, and they must be strengthened, as climate change is only getting worse, considering how our “Green City” permits development.
3. We propose that the Alex West SAP declare most if not all of the Alex West area a “Tree Canopy Preservation District,” and that the City include in this SAP much

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- stronger, more environmentally sound and climate change-reducing guidelines on how this part of our city will not only preserve its tree canopy, but add to it.
4. Alexandria can go way out ahead of similar municipalities (at least in Virginia) by doing so, and help set the standard for how our trees should and must be preserved.
 5. We note in passing what we hope should be obvious, which is that newly planted trees, and in particular, trees planted elsewhere to offset losses in Alex West development parcels, do absolutely **NOTHING** for the residents and taxpayers of this City. Yes, the new trees will eventually become full grown and provide canopy again. But our canopy consists of trees that are mostly 70 to 150 years old. While some Alex West residents today are children who might be around in 50+ years to see the replacements in their full glory, most of us will never live to see that, and we will end our years with a reduced canopy, not to mention a depleted climate and quality of life. The tree canopy matter is fixable - this Small Area Plan is the place to fix it.

We look forward to continuing dialogue to ensure this plan truly reflect our community's views and aspirations. Thank you.



Owen P. Curtis
President
Seminary West Civic Association

March 29, 2024

Via Email

To:

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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

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Re: AlexWest Small Area Plan Recommendations

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

We, Tenants and Workers United and the Legal Aid Justice Center write to comment on the AlexWest Draft Plan Recommendations. Foremost, we appreciate you being open to meeting with us and our residents on your planning process in these past months. Our organizations sent you a letter in June 2023 regarding the City's Draft Plan Objectives, at which time we expressed our concerns that the proposed objectives did not sufficiently focus on anti-displacement protections. As of today, we continue to express the same concerns after these nine months of seeing the City's AlexWest Small Area Plan Draft Recommendations.

We are still concerned that the City is not prepared for the likely displacement impact of planning and zoning changes in the West End. Working-class families who reside in this neighborhood, 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 AlexWest Small Area Plan can be an opportunity for new, innovative, and proactive tools and resources that will protect and preserve existing communities. This is why we urge the Department of Planning and Zoning to consider the following:

- **Preserving and creating deeply affordable housing:**
 - The City recognizes that the greatest need for West End working-class tenants, many of whom are people of color and immigrant families, is deeply affordable housing (available to households earning 40% AMI and below) but fails to guarantee more deeply affordable housing in the plan. Currently, recommended affordability requirements are for housing at 60% AMI, which many of our community members cannot qualify for. The plan misses key opportunities to require deeply affordable housing when it recommends significant height and density increases to incentivize development in parking lots and commercial areas, especially in the Focus Area. We recommend that you require a

significantly higher percentage of affordable housing for net new housing development created by rezoning, above the current proposed 10% requirement. Otherwise, the City will risk driving construction of market-rate housing, redevelopment of older buildings, and displacement of very low-income renters, for whom market-rate housing is out of reach.¹

- In light of increased development activity in Alexandria, the City should re-examine its measure of what affordability requirements are commensurate to development incentives in this sector of the City. Passing this Small Area Plan without updating the analysis will incentivize development approvals without adequate affordable housing requirements.
- We again raise concerns about incentivizing development in areas that are already providing the majority of the 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:**
 - 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.
 - We recommend that the City identify areas that are particularly vulnerable to losing existing affordable housing and require increased affordability provisions as conditions for development approval in those areas. For example, the City of Charlottesville has taken this approach in their Zoning Code, which requires increased affordability in their “Core Neighborhoods.” This would promote neighborhood preservation, maintain diverse housing options, meet housing needs, and prevent displacement.
 - The current recommendations offer minimal tenant protections. We recommend that the City include specific anti-displacement protections for tenants facing redevelopment such as mandatory relocation plans, just cause lease protections, and the right to return, wherever possible.
 - The current recommendations say little about preserving existing affordable housing, including initiatives such as dedicating City land and funding to establish land trusts and cooperatives. We would like to see more concrete commitments for housing preservation.

¹ Incentivizing upzoning without sufficient protections can worsen affordability pressures, because it encourages developers to build market-rate units and redevelop older lower-rent buildings, creating housing that is out of reach for existing renters. Market-rate construction can also lead to rent increases in nearby lower-cost buildings. 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>.

We advocate for the City to pause the planning process before large-scale changes go into effect, to allow for sufficient tools and resources to be put in place to protect West End families from displacement. We hope you can seriously consider our recommendations. We remain open to meeting with the City to further discuss our recommendations.

Sincerely,

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Date Received: March 29, 2024

I hope this email finds you well, and thank you again for all the work done in regards to the ALX West Small Area Plan. As per our previous email, I would like to officially submit ACT's comments regarding the AWSAP draft recommendations.

- **Affordability:** The draft recs currently emphasize the development of affordable housing. While this is a great step forward, we believe that recommendations around developing and preserving deeply affordable housing (i.e. households with incomes less than 50% AMI) should also be included. Our community members represent demographics that not only need affordable housing, but deeply affordable housing as well, and we have consistently heard through both community and individual meetings that families barely qualify for affordable housing options because they make below the 60% AMI range.
- **Partnerships:** The draft recs indicate that collaboration with private landlords will be utilized to develop and preserve affordable housing. We agree that engagement and collaboration with private landlords acting in good faith is necessary. However, we caution the City to exercise extreme care in determining which landlords to work with in this endeavor. It is clear that there are a few private equity property owners in ALX (ex: CIM and Morgan Properties) who engage in predatory business practices that can, and have, resulted in the displacement of working class families and therefore the subsequent destabilization of vulnerable communities (like the African immigrant community). Partnerships with city officials only gives these entities additional leverage to continue engaging in such practices, and allows them to go back to their investors and tout themselves as "community-centric" because of their relationship with localities. Entities such as these should not be allowed to profit off of the displacement of our communities and we emphatically request that the City find ways to sever ties with these companies (ex. develop alternative funding streams for the Housing Trust Fund that don't rely on contributions from such companies) and indicate in very clear public terms that predatory business practices are not tolerated in ALX. We also propose that in the execution of these recommendations, the City exercise truly diligent efforts to engage with impacted individuals and communities when determining whether to partner with private property owners (ex: consulting with tenants at Southern Towers about their experiences before entering into any partnership with CIM).
- **Tenant Protections:** The draft recommendations mention working to seek compliance with the City's Voluntary Rent Increase Policy. We agree with this recommendation but believe it should go further to include compliance with an amended version of the ALX Housing Guidelines (that also include the rent increase policy) that would include stronger tenant protections such as a 3% rent increase cap; good cause evictions; a requirement that landlords provide fair payment plan options to tenants who are only a month behind on rent instead of immediately filing for eviction; etc. As part of its housing justice work, ACT is developing its

advocacy efforts around amending the ALX Housing Guidelines to include more tenant protections, and would be happy to discuss this matter further with the AWSAP team as things progress.

As always, we look forward to continuing our engagement with the City around this and are happy to answer any questions you may have about our comments.

Have a great weekend!

Kind regards,

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She/Her/Hers

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March 29, 2024

Mr. Christian Brandt, AICP
Urban Planner
Department of Planning and Zoning
City of Alexandria

Re: Comments on AlexWest Draft Recommendations

Mr. Brandt,

The Coalition for Smarter Growth supports the overall recommendations for a more walkable, transit-friendly, mixed-use and inclusive West End, with greater housing security and opportunities for families to live in its neighborhoods. We also appreciate the City's thoughtful planning process that has emphasized proactive engagement for all communities to participate.

In particular, we support these important components of the draft recommendations:

- **Converting surface parking to housing and other uses** (including encouraging interim uses) is a common-sense approach to provide more opportunities for needed housing, corner retail, pocket parks and other uses along transit corridors.
- **Fixing unsafe intersections and taming high-speed corridors** are needed for safety, livability and equity. West End residents who walk, bike, scoot, take the bus, and drive should have a range of safe and comfortable travel options like other parts of Alexandria.
- **Creating more dedicated affordable units, via preservation and construction, and addressing problems that renters encounter** are critical. We are glad the City is working to help current residents stay and have quality housing, while also accommodating new households that can take advantage of the area's robust transit and other services.

We recommend these refinements:

- **Show a clear Transit-Oriented Development Strategy** – The AlexWest Plan maps and text need to better prioritize Bus Rapid Transit station areas for higher-density housing, neighborhood retail and services, and pedestrian improvements. The draft recommendations and maps hardly reference the coming West End Transitway and planned Route 7 BRT that are major investments. The plan needs to more explicitly embrace and communicate transit-oriented development and the transformative potential of these two major transit projects. With the change in the real estate market and West End Transitway phasing since the prior Beauregard corridor plan, the AlexWest plan needs to explain how transit-oriented development is still a fundamental principle and can support equitable housing opportunities.

- **Show higher-density housing opportunities near BRT stations** – The maps and recommendations should more clearly align the area’s long-term vision, planned higher housing densities and building heights, and pedestrian and bicycle network with station locations.
- **Reduce parking requirements and limit new parking in BRT station areas** – The plan should explore ideas such as a parking benefits district, removing parking minimums near transit, unbundling parking from rent/condo costs, and other strategies. These can help support more affordable and timely redevelopment of surface parking areas while helping existing residents have more affordable and convenient mobility options.

Other specific improvements and clarifications we encourage:

- **Plan for a future pedestrian/bike connection across I-395 to the Landmark development.** This improvement, that has been in the Landmark/Van Dorn small area plan, would be transformative for the West End, and needs more than a dotted circle on a map. In the interim, prioritize working with private landowners to create continuous direct pedestrian and bicycle facilities along Breckenridge Place to the Duke St bridge over I-395.
- **Identify Mark Center Avenue as a corridor for multimodal safety improvements** – Mark Center Avenue (near Seminary Rd and midway between Seminary and Mark Center Drive) is unsafe and inconvenient for many common pedestrian and bicyclist movements and bus riders accessing stops. Pedestrian safety deficiencies have been documented for example in the *Mark Center Transit Center Expansion Feasibility Study* conducted by WMATA for the City in 2017.
- **Improve access to the Winkler Preserve in the near term** – Access to Winkler for Southern Towers residents and the growing Mark Center residential community should be a priority.

Thank you for your work. We look forward to the refined plan.

Bill Pugh, AICP
Senior Policy Fellow

Cc: Jose Delcid, Urban Planner, Department of Planning and Zoning
Karl Moritz, Director, Department of Planning and Zoning