July 15, 2015

Fairfax County Planning Commission
Fairfax County Government Center
Fairfax, Virginia 22035

Re: Proposed Comprehensive Plan Amendment for Seven Corners

Planning Commissioners:

Thank you for this opportunity to comment on the Proposed Comprehensive Plan Amendment for Seven Corners. We appreciate the hard work of the Task Force and Work Group members as well as County staff in bringing this plan forward for consideration, and we understand the time and effort that has gone into developing these recommendations.

The Amendment provides a good overview of the study site’s physical characteristics with its analysis of current road and transportation patterns and the location and conditions of the built environment – residential neighborhoods, commercial structures and small commercial centers and public facilities. The recommendations bring this aging, older inner suburban area of the county into the 21st century, offering a vision of a more compact, attractive, walkable, mixed-use community with realigned transit routes and multiple transit options. We applaud and support all of these recommendations.

However, we believe that the recommendations for housing are a very modest start, and need to be made stronger and establish specific metrics; especially regarding housing that is affordable to lower income residents. Here are our concerns:

- It appears that no in-depth analysis was undertaken to determine the income levels of residents in the market affordable housing (older housing stock) currently located in the study area. In similar redevelopment plan proposals for Columbia Pike and the Beauregard corridor, both Arlington and Alexandria did extensive background work to identify the income levels of the populations currently living in similar older housing, and the sizes of units needed with the goal of preserving units for these lower income households. Their analysis showed a large percentage of these households earning between $32,000 - $54,000 (HUD’s definition of extremely low and very low income for 2015) for a family of four.

As the Plan mentions in the History section, these inner suburban areas in all three jurisdictions are filled with thousands of older affordable apartments that are home to hundreds of low and moderate income workers; many of whom are employed by the small businesses and retail establishments in the area. Without a good understanding of the housing needs of the
current residents, the county is unable to be assured that housing opportunities for these workers will be included in the redevelopment of Seven Corners. Additionally, it will be less likely that housing for future low income residents will be available.

- The strategies identified in the Land Use and General Guidelines for housing are vague and inadequate to meet the housing needs of low and middle income households. The Plan states that all existing housing in Sub-units A-1 and A-2 is affordable, and it calls for 1:1 replacement (p.10). What does that mean? Replacement at what size and what income level? The existing County policies which would apply to any residential redevelopment proposal do not address the housing needs of lower income households. The Affordable Dwelling Unit (ADU) ordinance is currently providing housing for people earning in the 60% area median income range - approximately $ 64,000 for a family of four - and the Workforce Housing policies provide rental units for households earning 70 – 120% of the area median income. This is completely out of reach for most of the households in the current residential population.

There are approximately 300 units in the study area that are owned by affordable housing developers. Those owners who are nonprofit developers will keep their units as affordable in perpetuity, but the for-profit developers of affordable housing have the option to convert their units to market rate after the commitment for their tax credit financing has expired.

Fairfax County is pricing its low income workforce out of the market; forcing them to live farther and farther from their jobs. The average rent for a 2-bedroom apartment is almost $1,600 a month and if you are a minimum wage employee, you need to work 155/week to pay rent! These high housing costs have implications, especially for many small businesses located in the study area, and their ability to recruit and retain employees. Those who commute long distances to work generate gridlock and traffic, impacting the movement of people, goods and services and making our work days less efficient and productive. To ensure that the County is a place of opportunity for people of all income levels, we recommend the following:

- An analysis of 1) income levels and household size of the current resident population; 2) the rent levels of existing market affordable properties in the study area. We believe that the Office of Housing and Community Development could be helpful in this regard.

- Establishing a goal or percentage of housing that will serve households earning less than 60% of the area median income. This should be based on the analysis done in the recommendation above to ensure that current residents will have options to remain in the area.

Strategies will be needed to achieve these objectives and one of the most efficient and cost effective strategies is the preservation of existing affordable housing. There is no reference to preservation in the Plan, and we believe that is a gross oversight. We urge staff to include preservation strategies, and to identify the tools necessary to do so. Here again, we believe collaboration with the Department of Housing and Community Development to explore which financial options might be available to facilitate this objective would be beneficial.
We recognize the need for and support the redevelopment of Seven Corners and we approve of many elements of this plan. We believe that having a better understanding of the housing needs of current low income residents and adopting clear policies and tools to address those needs will make this good plan even better. Thank you for hearing our concerns. We look forward to the redevelopment of Seven Corners as a place that is welcoming and affordable to residents of all income levels in the County.

Sincerely,

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