

Dear Members of the Housing Commission,

On behalf of the Columbia Heights Civic Association, I wish to communicate the civic association's strong opposition to a county staff proposal to alter the criteria for affordable housing ownership units in the Columbia Pike Form Based Code Neighborhoods Plan ("Neighborhoods Plan").

Attached is our February 26, 2020 letter to the Planning Commission, opposing the proposal. As we have learned more about this proposal, our opposition has only grown. This is a poorly thought-out proposal that will accelerate gentrification in the most diverse part of Arlington County. County staff indicate that a drafting error led to the affordable housing provisions in the Neighborhoods Plan being applied to condo and townhouse projects. A drafting fix can be made, but this is not it.

This proposal:

1. Accelerates displacement of low income, fixed income and minority residents;
2. Sets up "owners" to sell at below market rates, thus losing much of the benefit of home ownership;
3. Does not fund any ongoing housing assistance to allow owners to remain in their homes if they can no longer afford the mortgage, insurance or condo fees;
4. Creates an unwieldy long-term ownership scheme that does not address loss of eligibility due to increases in income;
5. Requires a regulatory enforcement system the county is in no position to administer;
6. Creates moral hazards associated with selecting who gets approved for units;
7. Creates moral hazards associated with owners subleasing units at higher prices; and
8. Would invite complex litigation involving illegal sub-lessees, mortgage holders, owners and the county itself.

Our other objections are more about values than anything else. Arlington's affordable housing tools should not be used to support or subsidize moderate income people. That Arlington staff are now defining affordable housing as housing affordable for those with moderate incomes for Arlington is a moral outrage. Affordable housing tools should be used to help those most in need, and permit long-term residents to remain in Arlington as they age. That is what was intended by the Pike communities when the Neighborhoods Plan was passed.

Rather than conform the Neighborhoods Plan to a deeply flawed Affordable Housing Master Plan, the master plan itself must be revisited. There are many zoning tools that could allow more flexibility to create missing middle housing. They have not been explored.

Development on Columbia Pike is not like the rest of Arlington. The Columbia Pike Form Based Code is the only code of its kind in Arlington County. It is an overlay to the underlying zoning for the entire corridor. The Form Based Code allows developers to short-cut processes and obtain significantly higher building heights along the corridor. Residents and civic groups lose the opportunity to be heard when projects are streamlined under the Form Based Code. The underlying “by-right” zoning in most instances does not allow the building heights permitted under the Neighborhoods Plan.

Columbia Pike residents are highly aware of the racial, ethnic and economic disparities in Arlington. Our population is at higher risk. We need affordable housing solutions that are not designed to displace lower income Arlingtonians. Our median income is 20 points lower than the county average. This proposal literally is a plan to replace lower income Pike residents with higher income residents, resulting in an associated loss of diversity on the Pike.

Staff argue that gentrification “is going to happen anyway.” That argument ignores the tremendous incentive created by this proposal. Buildings as high as 12-14 stories can be built under the Neighborhoods Plan *if* developers are granted affordable housing bonuses embedded in the code. The Neighborhoods Plan provides developers this incredible bonus height of up to an additional 6-8 stories. To allow this type of bonus to subsidize those with moderate incomes is absurd, and contrary to the intent of our community.

At this moment, Covid-19 puts many of our neighbors on Columbia Pike at high risk of displacement from eviction, or due to job loss. We have a higher percentage of Cov-19 infections and the highest percentage of essential workers. Many of the multi-family landowners along the Pike are family-owned companies that are experiencing lost rental income. At the same time, the Columbia Pike corridor continues to experience extraordinary housing pressure due to Amazon choosing Crystal City for its new national headquarters. The circumstances are perfect for venture capital to swoop in and buy out family-owned, multi-family buildings, thus displacing large number of persons at the worst possible moment.

It is correct to say that using affordable housing tools to support moderate income Arlingtonians is a policy choice. It is the wrong choice.

We ask the Housing Commission: (1) to stop this proposal (2) to recognize that the Affordable Housing Master Plan passed 5 years ago requires revision, and (3) to recommend that the County Board define affordable housing in a manner that is consistent with Arlington’s stated community values.

Regards

Ron Haddox
President of Columbia Heights Civic Association