

February 13, 2023

Via email to: Planning Commissioners
CC: ClerktotheBOS@fairfaxcounty.gov
Subject: Nature Forward urges stronger protections via the Affordable Housing Preservation Comprehensive Plan Amendment



Dear Planning Commissioners:

I am writing to you today on behalf of Nature Forward (formerly Audubon Naturalist Society), the Washington D.C. region's oldest independent environmental organization. In our conservation advocacy we prioritize human health & access to nature, biodiversity & habitats, fighting the climate crisis, and sustainable land use.

We appreciate Fairfax County's work with the Affordable Housing Preservation Comprehensive Plan Amendment¹ (Plan) which aims to save the county's affordable multifamily rental units which serve households with an annual income that is 60% of the Area Median Income (AMI) or below.

While Nature Forward is generally supportive of this initiative, we ask that that the Plan be made even stronger.

This Plan relates to both our Community-wide Energy & Climate Action Plan (CECAP) and Resilient Fairfax: *housing policy is climate policy*². With aggressive emission reduction goals in CECAP, it's important to take steps to reduce the need for single-vehicle travel. Retaining and creating affordable housing close in is an important way to reduce sprawl³. Fairfax County needs to reduce both sprawl and emissions to meet its climate and resilience goals:

- If people can afford to live closer to where they work, they will spend less time commuting and will produce fewer transportation emissions.
- Close-in affordable housing will give us the opportunity to save more of our natural areas by reducing sprawl.

As feedback for the February 15th public hearing, we ask the Planning Commission to:

¹ <https://www.fairfaxcounty.gov/planning-development/plan-amendments/affordable-housing-preservation>

² <https://natureforward.org/sprawl-is-bad-for-the-climate/>

³ <https://natureforward.org/sprawl-is-bad-for-forests-and-streams/>

1. **Support the goals of this Plan: Housing policy is climate policy.**

The intent of this CPA is strong, but the language should be strengthened to explicitly support CECAP goals. As the CECAP implementation plan states: "Equity is a crucial component of climate planning." While affordable housing is not explicitly mentioned in CECAP's implementation plan, the goal of reducing transportation emissions is mentioned as "Increase transit & non-motorized commuting to 30% (including telework) by 2030."⁴ A critical component of that is to not push residents further and further away from where they are working due to a lack of affordable housing options. Relatedly, building *energy efficient* affordable housing will support the Buildings and Energy Efficiency sector goals.

2. **Include protection for mobile home community residents.**

While we understand that a second Comprehensive Plan Amendment is being developed to specifically address mobile homes, delaying and handling this separately leaves these important, affordable communities vulnerable. This current plan being considered should include protections for mobile home residents who rent their land. Fairfax County has several mobile home communities, which are among the most affordable remaining housing, are often close to job and transit centers, and disproportionately shelter immigrants and people of color. A number of these communities (e.g. Harmony Place, Audubon Estates) are also in floodplains, making them even more vulnerable to the impacts of climate change - so working to include their residents in a strategy for affordable, climate-resilient housing will help meet both affordability and climate goals.

3. **Include a strategy for workforce housing in addition to affordable housing.**

Fairfax County has one of the highest average median incomes (AMI) in the nation because of the large number of residents who hold government-related jobs that require high skills and education. The high average income in Fairfax hides substantial wealth gaps. For example, the median salary for a county employee in 2021⁵ was \$73,108, meaning our own county workers make below AMI. Ask the Board of Supervisors to increase the number of people protected through this CPA by making sure the eligibility threshold covers workforce housing. This CPA should also protect families making between 60% and 80% of AMI, which could increase carbon emissions savings as well. Affordable housing is good climate policy and a matter of justice and fairness for residents who underpin the county workforce.

⁴ Page 9: https://www.fairfaxcounty.gov/environment-energy-coordination/sites/environment-energy-coordination/files/assets/documents/cecap/cecap%20implementation%20plan%201623_a-1a.pdf#page=9

⁵ <https://govsalaries.com/salaries/VA/fairfax-county>

4. **Include incentives for creating and preserving affordable housing near key transit corridors.**

True cost of housing is more realistically the cost of housing **plus** transportation. Housing close to metro trains and buses enables households to have fewer cars and thereby pay less for insurance, maintenance, financing, and gas. But metro-adjacent housing is typically some of the most expensive housing in our region. Retaining and creating affordable housing near transit will be good for residents' bank accounts and for the climate because no-car and one-car households produce fewer carbon emissions than 2+ car households. This aligns with the Affordable Housing Preservation Task Force recommendation highlighted in the staff report⁶ to develop policies that consider preservation based of location and characteristics of the affordable housing, such as those near mass transit and walkable amenities.

In conclusion

By further strengthening this Plan, Fairfax County will be better preserving affordable housing and helping to further reducing carbon emissions from transportation.

In the DC region, affordable housing is often far away from employment centers ("drive til you qualify") and lacks reasonable public transportation options. When people move far away to find affordable housing, the result is increased car traffic, increased transportation emissions, and tree removal⁷ to make way for housing and highway sprawl - all of which accelerates negative climate impacts⁸ in our region. With aggressive emission reduction goals in CECAP, it's important to take steps to reduce the need for single-vehicle travel. Retaining and creating affordable housing close in is an important way to reduce sprawl.

Thank you for the consideration of these comments.

Sincerely,



Renee Grebe
Northern Virginia Conservation Advocate
Nature Forward

⁶ Page 9: <https://www.fairfaxcounty.gov/planning-development/sites/planning-development/files/assets/documents/compplanamend/affordable-housing-preservation/2021-cw-1cp-staff-report.pdf#page=9>

⁷ <https://natureforward.org/sprawl-is-bad-for-forests-and-streams/>

⁸ <https://natureforward.org/sprawl-is-bad-for-the-climate/>