AHOME COMMENTS
PLAN AMENDMENTS FOR TYSONS

The following represents AHOME general comments on the proposed plan amendment for Tysons. AHOME is a non profit affordable /workforce housing advocacy group with the associated AHOME Foundation. The history of AHOME goes back to the origins of the Affordable Dwelling Unit Ordinance up to and including the recent High Rise Task Force many of whose housing policy recommendations for development centers were adopted by the Board of Supervisors in the fall of 2007. AHOME members include representatives from the Fairfax Chamber, Northern Virginia Building Industry Association, League of Women Voters, Federation, private and non profit developers, Fairfax County Firefighters and Paramedics, and other organizations and individuals. In addition, AHOME members have been involved in the Tysons Corner replanning effort and are represented on the Task Force itself. AHOME believes that the Tysons housing recommendations represent sound long term urban policy that recognize the need for affordable/workforce housing while preserving the ability of the private sector to achieve their business and investment goals for years to come.

1. In general, AHOME feels the language regarding affordable housing provides adequate incentives to developers. It is important to note however, that care should be taken to ensure that the proposed density increases recommended by the Task Force are not constrained by other factors such as arbitrary height restrictions or other regulator requirements that would preclude the development industry from achieving the bonuses necessary to provide the mixed income housing proposed. In communities in northern Virginia, these situations have even impacted non profit developers and thereby have cost local affordable housing funds expenditures that were not necessary.

2. In terms of incomes to be served, the proposed requirements for Tysons go beyond the recommendations of the High-Rise Task Force and call for 20% of all housing units to be provided as workforce units and 10% of those set-aside units to serve households with incomes of 60% of median or less. AHOME concurs that income tiering is appropriate but does not feel it is necessary to grant additional density bonus for rental housing serving persons in the 100%-120% range. For rental units only, it is recommended that it be capped at 100% of AMI. It should be noted that the AMI was recently increased to over $102,000. At this income range, rental rates can approach $2600 per month without being categorized as burdensome.

   It is so important that no units sales or rental prices be established other than income limits as the variables for such as financing and non loan payment expenses preclude this from being prudent for purchaser, renter, and owner/developer.

3. AHOME also strongly believes that parking requirements be established that adequately reflect the transit oriented nature of the new Tysons and recognize that structured parking cost is a significant factor in mid and high rise development. AHOME also strongly feels that the county should give more careful thought concerning the use existing parking structures. There is the potential of requiring too many costly parking spaces for the future urban Tysons.

4. AHOME strongly encourages the county to recognize and encourage the principle of aggregation as a developer option. AHOME defines aggregation as allowing several development projects to pool their housing unit requirements. This will provide another method of providing affordable/workforce housing in sufficient number to reach development economies. The aggregation of workforce housing will greatly facilitate the achievement keeping units affordable permanently as to price and monthly expense, price some units for 60% AMI, make units indistinguishable from market-rate units except for the building types, and actually make it easier to bring affordable housing finance tools to the developments. With the income mixing approach, there should be no concern about potential "low income" concentration. There are many highly successful mixed income developments.

   Aggregation might also encourage proffers of cash and land for workforce housing. It will make the development of workforce units profitable for both private and non profit affordable/ workforce specialists on parcels that are not in the highest density locations, but still within walking distance of the Metro. When the housing market returns to something approaching "normal," a high-rise residential developer will likely pay $75,000 to $125,000 per unit to transfer his obligation to produce workforce units to another developer in Tysons.

5. AHOME also strongly encourages the county to require contributions for affordable/workforce housing from non-residential developers. This will make it easier to create workforce housing by providing additional financial resources.

6. AHOME feels the proposed density for residential development within a half mile or more of the Metro stops is too limiting. It assumes that historical attitudes about "walkable" distances to transit will continue into the future. AHOME feels that this standard is too restrictive and does not represent an approach that will likely see personal transportation cost increase in the future. As a society we need to extend that distance as a matter of public health policy. That is entirely consistent with creating "a truly urban place."

7. AHOME also recommends the need for an implementation entity that can monitor progress, implement policy, participate in decision making, and even be a short term source to hold land or unit requirements. There is also a potential that the entity might be a vehicle for short term financing in support of larger development goals.

8. AHOME also strongly recommends that consideration of all of the above should include the recognition of the many tools, both financial and non financial available that will allow the recommendations to be successfully implemented. This includes tools provided by government and private lenders and organizations.

9. AHOME recommends and will offer to organize and financially sponsor a tour of northern Virginia affordable/workforce high rise and high density developments. This tour will be offered to builders and decision makers in order that they might visually see examples of successful affordable/workforce housing in areas similar to the future Tysons.