



 LEGAL AID
JUSTICE CENTER



Dear President Newbille and members of the City Council:

You are scheduled to hold a public hearing and vote December 14th on ORD. 2020-236, which would adopt the Richmond 300 Master Plan. We believe that most elements of the Master Plan are solid policy recommendations for the city's future; however, we are writing to offer joint recommendations for amendments. We believe that affordable housing issues have not been adequately addressed in the plan, as Councilmember Robertson noted in her comments during the Planning Commission meeting on October 10, 2019. We specifically call for the following to be included in the plan:

1. As currently drafted, Plan Objective 14.6 endorses RRHA's intention to demolish all of the existing public housing stock in our city. The people of Richmond oppose the mass demolition of public housing and forcible transfer of residents to a short term voucher system. The Richmond 300 plan should explicitly include the intention to build one-for-one, brick-and-mortar replacements of like kind within the City limits for any public housing units that are lost in the process of redevelopment. This maintains consistency with the City's commitment as expressed in both the Draft Equitable Affordable Housing Strategy (i.e. "no loss in the number of 'public housing units' as reported in RRHA's 2019-2020 Annual Agency Plan.") and the City of Richmond's 2013 Antipoverty Commission report (i.e. "[R]edevlopment should not lead to a net loss of public housing units. Offering Section VIII vouchers to displaced residents while reducing the net number of housing units is not acceptable, because it decreases the supply of affordable housing in the city.)
2. We support the drafted Plan Objective 11.2 and 11.3 and the intention to equitably expand Richmond's diverse economy. Cost of living increases continue to drastically outpace wage growth in Richmond, therefore increased job access does little to protect residents from displacement due to rising housing costs. The Master Plan must support true community wealth building by building upon existing neglected frameworks that were created to do this very thing. The Office of Community Wealth Building's Social Enterprise Feasibility Analysis report explored ways to raise the living standards of residents so that they benefit from redevelopment "rather than being priced out and displaced as property values rise." The report states that "social enterprise has a critically important role to play" in addressing poverty and "provides further value to the City, *in addition to the direct economic benefits that the businesses provide.*"

Within its support for small business startup and growth, Goal 11 should include the intention to develop and support efforts that increase business contracting opportunities

for Section 3 resident owned businesses.

3. The Richmond 300 Plan should include the development of an affordable housing ordinance pursuant to the provisions of Code of Virginia, § 15.2-2305.1, so that any developer who seeks to upzone private property negotiates community benefits that support residents with incomes below 50% AMI as part of the rezoning or special use permit process. City Council should still lobby the general assembly to be given powers under 15.2-2304 while also creating a stronger affordable housing ordinance in the interim. In addition, the Richmond 300 plan should specify that for proposed city-initiated rezoning of large areas, the city will reserve some height and density as a benefit in return for contributions to affordable housing, whether through on-site units, adjacent units, or contributions to a local supplemental rental assistance program.

The current intention of the plan as expressed by the city's Director of Planning and Development Review is to "rezone to the plan," which will create tens of millions of dollars of value for landowners, many of whom have long held vacant land in our city at a very low basis. Yet, as noted in the plan, "two-thirds of households earning less than 80 percent of the HUD area median family income (HAMFI) were housing cost-burdened." Therefore, we need to address this affordability crisis with every tool in the toolbox, including negotiation of contribution to community benefits, particularly affordable housing, given the value being created.

4. The plan should also provide even stronger affordability requirements and community benefits for developers who wish to purchase and redevelop city owned land with a significant share of units at 30% of the AMI.
5. Programs and incentives for the development of new affordable units alone, however, is not enough to preserve and increase stable, affordable housing for all income levels, and in particular for low and very low income levels. The preservation and expansion of the city's affordable housing stock through affordable housing zoning ordinances, LIHTC programs, and inclusionary zoning must be coupled with other strategies, such as reforming the Affordable Housing Trust fund to target projects that create housing for households earning less than 30% of the AMI and the preservation of existing federally assisted housing.
6. The plan should commit council to developing an ordinance for a *permanent* inclement weather shelter for houseless people in the city of Richmond and commit to the construction of transitional housing.

The Richmond 300 plan promises a city that is equitable and affordable, but this cannot be achieved without stronger commitments to affordable housing and to resident involvement in planning for the future of public housing without displacement. Every Richmonder deserves a safe and affordable place to live. We deserve to age in place, and we deserve the right to stay in the communities that we call home. We therefore urge you to consider these amendments.

Thank you for your consideration,

**Partnership for Smarter Growth
Richmond for All
Legal Aid Justice Center**