



March 21, 2026

RE: Alexandria Environmental Policy Commission Comments on Housing 2040 Draft Plan

To: Tamara Jovovic and the Housing 2040 Plan Staff, Alx Office of Housing

CC: Mayor, Vice Mayor, City Council

Submitted via: engage.alexandriava.gov/housing2040plan and housing2040plan@publicinput.com

Dear Housing 2040 Plan Staff,

The Alexandria Environmental Policy Commission (EPC) is pleased to submit comments endorsing the Housing 2040 Draft Plan Recommendations and Strategies. The EPC commends the Office of Housing, in partnership with the Office of Climate Action, for producing a thoughtful, ambitious, and aspirational plan that meaningfully integrates considerations such as sustainability, energy efficiency, climate resilience, and environmental justice throughout its goals. This is a significant improvement over the prior plan, and we are proud that EPC input contributed to shaping it.

What We Affirm

The EPC is particularly encouraged by Goal 10, which dedicates focused attention to energy efficiency improvements and weatherization, and green building practices to make homes healthier and more resilient. Having sustainability elevated to a standalone goal in a housing master plan is meaningful, and we do not take it for granted. We also affirm the sustainability ties woven throughout Goals 1, 2, 4, 6, and 8, which reflect a welcome recognition that affordability and environmental sustainability are complementary, not competing, integrated priorities.

For new developments, we specifically applaud reference to the Green Building Plan which identifies Energy Use Intensity (EUI) as a performance-based compliance pathway, and the encouragement of high-performance building approaches such as Passive House and geothermal HVAC systems. For existing housing, we applaud the Plan's strategy to encourage energy benchmarking for existing multifamily buildings, the technical assistance programs being developed by the Office of Climate Action including Eco-City CHAMPs and the Multifamily Challenge Program, and the The Pendleton Rooming House redevelopment project, which incorporated geothermal energy through a collaborative investment by the Office of Housing and the property owner, which is exactly the kind of creative, impactful work we hope to see continue and scale.

The EPC also encourages the final plan to explicitly call-out extreme heat and flooding as the primary physical climate risks facing Alexandria's housing stock. These are known, measurable, and already-felt threats in our community,



particularly for residents in low-lying areas and older, less insulated housing. While we understand the plan's current language references "extreme temperatures and weather," we believe naming heat and flooding directly will ensure that implementing partners, developers, and future city staff understand exactly what climate resilience means in Alexandria's specific context, and prioritize the residents most vulnerable to those risks.

One Flag We Ask You to Note

The EPC recognizes that, as a Dillon Rule state, Virginia limits the authority of local jurisdictions to powers specifically granted by the Commonwealth. This constrains Alexandria's ability to affect greater change across the housing stock, for example to enact a stretch code requiring all new developments to follow the Green Building Plan, or to require energy performance improvements in existing privately owned buildings, tools the EPC would otherwise strongly advocate for, particularly given the energy burden borne by low-income renters in older multifamily housing.

We note this not as a criticism of the plan, but as a call to action at the state level. The EPC encourages the City to continue advocating in Richmond for expanded local authority over building performance standards and stretch codes, and to ensure that the voluntary programs established under Goal 10 are as well-resourced and widely promoted as possible in the interim. These are long-lived buildings, the decisions made today will shape the energy performance and livability of Alexandria's housing stock for generations.

The EPC is grateful for the iterative engagement process that shaped this plan and looks forward to continued collaboration as it moves toward adoption and implementation.

Sincerely,

A handwritten signature in black ink, appearing to read "Marta Schantz".

Marta Schantz, Chair
Alexandria Environmental Policy Commission