City of Alexandria, Virginia

MEMORANDUM

DATE: MAY 16, 2012

TO: THE HONORABLE MAYOR AND MEMBERS OF CITY COUNCIL

FROM: RASHAD M. YOUNG, CITY MANAGER

SUBJECT: CONSIDERATION OF A RESOLUTION AFFIRMING THE CITY’S CURRENT ZONING FOR HUNTING TOWERS (1202 AND 1204 SOUTH WASHINGTON STREET) AND ITS PAST, PRESENT AND FUTURE SIGNIFICANCE AS A MARKET AFFORDABLE AND WORKFORCE HOUSING ASSET

ISSUE: Hunting Towers’ zoning and land use and its value to Alexandria in providing critically-needed market affordable and workforce rental housing.

RECOMMENDATION: That City Council adopt the attached Resolution (Attachment 1) which affirms the City’s current zoning for 1202 and 1204 South Washington Street, acknowledges Hunting Towers’ important role in providing market affordable and workforce rental housing and re-states the City’s ongoing commitment to preserve Hunting Towers as such, within available tools and resources.

BACKGROUND: At its April 10 legislative meeting, Council received a briefing on the Hunting Towers apartment site (1202 and 1204 South Washington Street) and asked staff to docket a resolution that Council could consider to inform the Virginia Department of Transportation (VDOT), and any prospective buyers of Hunting Towers, of the properties’ current zoning status, which has the practical effect of likely limiting the redevelopment potential of the Hunting Towers site.

A docket item and resolution to this effect were presented to City Council at the May 8 legislative meeting (Attachment II). During discussion, members of Council requested that the proposed resolution be revised to more substantively express Hunting Towers’ value to the community as an affordable and workforce housing resource. In addition, in response to an inquiry from a member of the Affordable Housing Advisory Committee (AHAC), Council also asked staff to review Resolution 2227 adopted in May 2007 to evaluate that whether the intent of that prior action regard Hunting Towers was consistent with the current proposed resolution (Attachment III).
DISCUSSION: For several decades, Hunting Towers has been an important rental housing asset for the City of Alexandria. As has been frequently reported, this apartment property is often the first home for working professionals arriving in the Washington DC region, the first home for diverse, new immigrant households settling in the United States, a comfortable and convenient home for seniors opting to retire in Alexandria, as well as the temporary home of choice for military personnel and others assigned to this area for work purposes.

Over time, the size of Hunting Towers’ units (about half of the 530 apartments are efficiencies ranging from 380 to 450 square feet), and the relative age and condition of the property has moderated rents and caused most to be within or just slightly above the range considered to be affordable at affordable and/or workforce income levels. Somewhat less than 130 households residing in the property in 2005 have had their rents “frozen” by VDOT since that time in consideration of the disruption experienced due to construction activity related to the Woodrow Wilson Bridge project. Given the well-documented, ongoing diminution of Alexandria’s inventory of market affordable and workforce rental housing to fewer than 6,000 units at the current time, including VDOT’s prior demolition of more than 200 units at Hunting Towers to accommodate the Bridge project, it is important to restate the importance of Hunting Towers’ remaining 530 units being preserved as affordable and workforce housing, as part of the City’s core commitments to affordable housing, diversity and economic sustainability.

In response to Council’s May 8 request that the proposed Resolution be amended, staff has reviewed the Resolution 2227 adopted by Council in 2007, and has incorporated affordable/workforce housing purpose and value into the May 8 Resolution. The attached resolution, if adopted by Council, would reaffirm the City’s existing zoning policies for the Hunting Towers property, acknowledge Hunting Towers’ significance as an affordable and workforce rental housing asset and reassert the City’s commitment to work with offerors, including the prior owner, if successful in re-acquiring the property, to preserve Hunting Towers as affordable and workforce housing, within tools and resources available to the City. The resolution also directs the Mayor to transmit Council’s policy position to the Virginia Department of Transportation.

FISCAL IMPACT: When Hunting Towers is sold by VDOT to the private sector, the site will return to the tax rolls and generate between $0.5 million and $0.7 million per year in added real estate tax revenues. The City would work within available resources to preserve Hunting Towers as affordable and workforce rental housing.

ATTACHMENTS:
Attachment I: Proposed (Revised) Resolution on Hunting Towers
Attachment II: May 8, 2012 Docket Memorandum regarding Consideration of a resolution affirming the City’s Current Zoning for 1202 and 1204 South Washington Street (Hunting Towers)
Attachment III: Adopted Resolution 2227 (May 2007)
STAFF:
Mark Jinks, Deputy City Manager
Mildrilyn Davis, Director, Office of Housing
Helen McIlvaine, Deputy Director, Office of Housing
Faroll Hamer, Director, Department of Planning and Zoning
Barbara Ross, Deputy Director, Department of Planning and Zoning
RESOLUTION NO. _____

WHEREAS, Hunting Towers apartments (currently marketed as Hunting Point on the Potomac), which are located at 1202 and 1204 South Washington Street and which were constructed in 1950, provide 530 units of needed market affordable and workforce rental housing in the City;

WHEREAS, the City values Hunting Towers’ past, present and future role as a housing resource which immeasurably contributes to Alexandria’s strategic goals and core values of affordable housing, diversity and economic sustainability;

WHEREAS, the City is committed to seeking to preserve, a continuum of affordable and workforce housing options for current and future residents of Hunting Towers, as well as for renters elsewhere, so that Alexandria may continue to be a first home, as well as a final home to those who wish to live here;

WHEREAS, the City has continually expressed to VDOT, as well as to public and elected leaders at the federal, state and local levels, including in its prior Resolution 2227 adopted in May 2007, as well as in subsequent communications with VDOT and other stakeholders and representatives, the importance of preserving Hunting Towers as an affordable and workforce housing resource, and the City’s commitment to participate, collaborate and provide support, within its means, to achieve this outcome;

WHEREAS, the Virginia Department of Transportation (VDOT) purchased Hunting Towers in November 2001 as part of the Woodrow Wilson Bridge project;

WHEREAS, pending approval from the Federal Highway Administration (FHWA), VDOT now intends to sell Hunting Towers and has initiated a sale process which will include: (a) a request for non-binding expressions of interest from potential purchasers accompanied by a financing plan, (b) a subsequent offer by VDOT to the original owner to exercise its right-of-first refusal to re-acquire Hunting Towers at its current fair market value, (c) in the event the original owner does not or cannot exercise its first refusal right to re-acquire at fair market value, then the local government where the property is located (i.e., the City) may seek to acquire Hunting Towers from VDOT at a market price determined by VDOT, and finally (d) if these actions do not result in a sale, VDOT will undertake a sealed bid sale process open to all bidders;

WHEREAS, in these various sale process steps planned by VDOT, each potential buyer will likely undertake due diligence in preparation for a potential acquisition of Hunting Towers;

WHEREAS, potential buyers’ bids will be influenced by what they understand the future development potential of the Hunting Towers property to be;

WHEREAS, potential buyers need to clearly understand the existing zoning on the property and how that influences what can or cannot be constructed on the Hunting Towers property;
WHEREAS, under the City’s zoning, Hunting Towers is a noncomplying property in regard to its existing height, setback, parking, and other regulations;

WHEREAS, the Hunting Creek Area Plan, the Washington Street Standards and Guidelines, and other zoning requirements, as well as local and federal requirements to protect the unique natural land and water environment immediately surrounding the property, all significantly limit Hunting Towers’ future redevelopment options; and

WHEREAS, it is required that any redevelopment of the Hunting Towers property conform to the City’s zoning and all local as well as federal environmental requirements governing the property;

NOW BE IT THEREFORE RESOLVED THAT the City Council of the City of Alexandria, Virginia, hereby states that it reaffirms the City’s current zoning and environmental requirements with regard to the Hunting Towers property as appropriate for this site.

BE IT FURTHER RESOLVED THAT the City Council of the City of Alexandria, Virginia hereby states that it will use tools and resources available to the City in order to work with the eventual acquirer of Hunting Towers to help maintain Hunting Towers as a market affordable and workforce housing asset.

BE IT FURTHER RESOLVED THAT the Mayor will communicate this reaffirmation of existing zoning to VDOT and request them to inform all prospective buyers of the Hunting Towers property of these existing zoning and environmental requirements.

ADOPTED this _____ day of ______, 2012
City of Alexandria, Virginia

________________________________________
William D. Euille, Mayor

ATTEST:

________________________________________
Jackie M. Henderson, MMC
Clerk of Council
City of Alexandria, Virginia

MEMORANDUM

DATE: MAY 2, 2012

TO: THE HONorable MAYOR AND MEMBERS OF CITY COUNCIL

FROM: RASHAD M. YOUNG, CITY MANAGER

SUBJECT: CONSIDERATION OF A RESOLUTION AFFIRMING THE CITY’S CURRENT ZONING FOR 1202 AND 1204 SOUTH WASHINGTON STREET (HUNTING TOWERS)

ISSUE: Hunting Towers zoning and land use.

RECOMMENDATION: That City Council adopt the attached Resolution affirming the City’s current zoning for 1202 and 1204 South Washington Street.

BACKGROUND: At its April 10 legislative meeting, Council received a briefing on the Hunting Towers apartment site (1202 and 1204 South Washington Street) and asked staff to docket a resolution that Council could consider informing the Virginia Department of Transportation (VDOT), and any prospective buyers of Hunting Towers, of the properties’ current zoning status, which has the practical effect of likely limiting the redevelopment potential of the Hunting Towers site.

VDOT indicated to the City earlier in the year that it planned to proceed with a request for Expressions of Interest (EOI) from prospective buyers of Hunting Towers (now marketed as “Hunting Point on the Potomac”). VDOT issued the EOI on March 23, 2012. Although the original owner of the Hunting Towers buildings, HGLC Associates, L.L.L.P. (HGLC) still has the right of first refusal on the Hunting Towers property, VDOT is proceeding with the EOI process under which VDOT will be asking any party for non-binding, no deposit bids on the Hunting Towers property. VDOT intends then to use those EOI bids as one set of benchmarks in its setting an expected price that it would expect HGLC to pay for the buildings.

If HGLC does not want to re-acquire Hunting Towers then VDOT intends to undertake a sealed bid process open to all interested bidders (even if they did not participate in the EOI process). As part of this upcoming sale process planning, VDOT notified Hunting Towers tenants of the planned sale, and then held a meeting on Monday, April 2, with Hunting Towers residents to discuss the sale process. About 60 tenants attended the VDOT meeting.
One key determinant of the future of any property is the redevelopment potential of that property based upon the locally determined zoning and land use policies that apply to a property. In the case of Hunting Towers, the redevelopment opportunities are very narrowly limited as a result of prior City zoning and land use decisions. First, Hunting Towers is a non-complying property in regard to its existing height, setback, parking and other City requirements. This means that a taller building(s) with a different footprint could not be constructed on this site. The only option that a property owner would have to keep the existing non-complying density and height would be to construct a new building on nearly the same footprint as the two existing Hunting Towers buildings. To tear down income producing property in relatively sound condition only to be able to replace it in kind in regard to height and density would not be economic. The only economically justified theoretical redevelopment option would appear to be to construct new buildings of much greater height and density, and that would be extremely at variance with City zoning.

Any redevelopment of Hunting Towers would also need to comply with the Washington Street Standards and Guidelines, the Hunting Creek Area Plan, as well as local and federal requirements to protect the unique natural land and water environment immediately surrounding the property.

When the Hunting Creek Plan was adopted in 2005, Council approved language that stated:

“3.4.3. In order to retain affordable and workforce housing in the City, the City may consider a zoning text amendment or zone change to allow additional height and density with setbacks appropriate to the project and the site, and in conformance with the Board of Architectural Review’s Washington Street Standards and Guidelines, with SUP approval, if the project provides for extraordinary affordable housing, including but not limited to the acquisition by the City, or by a nonprofit housing corporation, of units at the project.”

At the time this language was added a large development project was proposed for the Hunting Terrace site (which is across South Washington Street from Hunting Towers), and the proposed developer, IDI, proposed, as part of the Hunting Terrace development, that Hunting Towers be converted into workforce income-level condominiums. However, the proposed developer of the Hunting Terrace site was not able to acquire Hunting Towers from VDOT and that was one of the factors that led to the development proposal not being approved by Council.

The language in 3.4.3 above, although not site specific, was aimed at preserving an “extraordinary” level of affordable housing, accomplished possibly by the preservation of Hunting Towers and the redevelopment of Hunting Terrace. That, coupled with the Hunting Towers site severe redevelopment constraints described earlier in this memorandum, makes the 3.4.3 added height and density language not practically or economically applicable to the Hunting Towers site by itself. It is possible that at some point in time a developer could propose additional height and density on the Hunting Terrace site and in conjunction with that proposal offer an “extraordinary” level of affordable housing on either the Hunting Terrace or Hunting Towers site. However, given the current real estate market that seems unlikely.
In conclusion, it is staff’s judgment that the Hunting Towers site is appropriately zoned, and that changes to existing zoning are not recommended. This still leaves open the above discussed possible changes to Hunting Terrace zoning as per 3.4.3 of the Hunting Creek Plan. Such changes because of the Washington Street Standard and Guidelines and BAR review would make rezoning for additional height and density difficult.

The attached resolution if adopted by Council would reaffirm the City’s existing zoning policies for the Hunting Towers property, and would direct the Mayor to transmit that Council policy position to the Virginia Department of Transportation.

**FISCAL IMPACT:** When Hunting Towers is sold by VDOT to the private sector, the site will return to the tax rolls and generate between $0.5 million and $0.7 million per year in added real estate tax revenues.

**ATTACHMENTS:**
Attachment 1: Proposed Resolution on Hunting Towers

**STAFF:**
Mark Jinks, Deputy City Manager
Barbara Ross, Deputy Director, Planning & Zoning
Mildrilyn Davis, Director, Office of Housing
Helen McIlvaine, Deputy Director, Office of Housing
Melodie Seau, Division Chief, Office of Housing
RESOLUTION NO. _____

WHEREAS, Hunting Towers apartments (currently marketed as Hunting Point on the Potomac), which are located at 1202 and 1204 South Washington Street and which were constructed in 1950, provide 530 units of needed affordable and workforce rental housing in the City;

WHEREAS, the Virginia Department of Transportation (VDOT) purchased Hunting Towers in November 2001 as part of the Woodrow Wilson Bridge project;

WHEREAS, pending approval from the Federal Highway Administration (FHWA), VDOT now intends to sell Hunting Towers and has initiated a sale process which will include: (a) a request for non-binding expressions of interest from potential purchasers accompanied by a financing plan, (b) a subsequent offer by VDOT to the original owner to exercise its right-of-first refusal to re-acquire Hunting Towers at its current fair market value, (c) in the event the original owner does not or cannot exercise its first refusal right to re-acquire at fair market value, then the local government where the property is located (i.e., the City) may seek to acquire Hunting Towers from VDOT at a market price determined by VDOT, and finally (d) if these actions do not result in a sale, VDOT will undertake a sealed bid sale process open to all bidders;

WHEREAS, in these various sale process steps planned by VDOT, each potential buyer will likely undertake due diligence in preparation for a potential acquisition of Hunting Towers;

WHEREAS, potential buyers’ bids will be influenced by what they understand the future development potential of the Hunting Towers property to be;

WHEREAS, potential buyers need to clearly understand the existing zoning on the property and how that influences what can or cannot be constructed on the Hunting Towers property;

WHEREAS, under the City’s zoning, Hunting Towers is a noncomplying property in regard to its existing height, setback, parking, and other regulations;

WHEREAS, the Hunting Creek Small Area Plan, the Washington Street Design Standards, and other zoning and land use requirements, as well as local and federal requirements to protect the unique natural land and water environment immediately surrounding the property, all significantly limit Hunting Towers’ future redevelopment options; and

WHEREAS, it is required that any redevelopment of the Hunting Towers property conform to the City’s zoning rules, its land use policies, and all local as well as federal environmental requirements governing the property;

NOW BE IT THEREFORE RESOLVED THAT the City Council of the City of Alexandria, Virginia, hereby states that it reaffirms the City’s current zoning laws, land use policies and environmental requirements with regard to the Hunting Towers property as appropriate for this site.
BE IT FURTHER RESOLVED THAT the Mayor will communicate this reaffirmation of existing zoning and land use policies to VDOT and request them to inform all prospective buyers of the Hunting Towers property of these existing zoning and land use policies.

ADOPTED this ___ day of _____, 2012
City of Alexandria, Virginia

William D. Euille, Mayor

ATTEST:

Jackie M. Henderson, MMC
Clerk of Council
RESOLUTION NO. 2227

WHEREAS, over the past 35 years, like other American cities, Alexandria has lost significant numbers of affordable and workforce housing units to redevelopment and changing market conditions;

WHEREAS, Alexandria has historically had a diverse, hard-working population that has made possible our success and has been the cornerstone of our community character;

WHEREAS, the loss of affordable and workforce housing, including the 331 units of Hunting Towers and Hunting Terrace that have already been demolished, as well as the 116 remaining units of Hunting Terrace that are proposed for demolition, affects our economy and job base, strains our transportation systems and threatens the fabric and history of our diverse multiracial and mixed-income community;

WHEREAS, the preservation of affordable, workforce housing, as well as preservation and enhancement of the natural environment and historic resources, are core components of Alexandria's Strategic Plan and is viewed by the City Council as key strategies to foster the long-term economic success and prosperity of our community;

WHEREAS, the City, through the creation of the one-penny affordable housing set-aside along with the partnership of area non-profits has demonstrated its commitment to preserve affordable and workforce housing throughout the City;

WHEREAS, there are approximately 12,000 units of affordable housing remaining in the City;

WHEREAS, the Alexandria City Council believes that the Federal government, the Commonwealth of Virginia, local citizens, private organizations and corporations should continue to work cooperatively with the City of Alexandria to ensure the preservation of affordable and workforce housing;

WHEREAS, the Virginia Department of Transportation (VDOT) currently owns 530 units of affordable housing at Hunting Towers which were constructed in 1949 and many of which have served as affordable, workforce housing for decades;

WHEREAS, VDOT plans to sell Hunting Towers and is therefore required to dispose of Hunting Towers utilizing established State and federal policies and procedures;

WHEREAS, over the past decade over 1,000 citizens have urged the City Council to preserve Hunting Towers as affordable housing;

WHEREAS, Hunting Towers has been and is home to exemplary Virginians from a variety of backgrounds, including a feminist author and politician, soldiers, sailors, veterans, government employees, an astronaut, a U-2 spy plane pilot, airline pilots, flight attendants and many other important residents of Virginia;

WHEREAS, Hunting Towers sits at the entrance to one of our Country's oldest historic districts and on the celebrated George Washington Memorial Parkway that connects George Washington's home at Mt. Vernon to the United States Capitol;

WHEREAS, the City has established a Hunting Creek Stakeholders Panel to review issues of development, affordable housing and historic significance affecting Hunting Towers and Hunting Terrace;
WHEREAS, the opportunity to preserve Hunting Towers is a once-in-a-lifetime chance to preserve an enormous amount of affordable, workforce housing;

WHEREAS, the best opportunity to preserve Hunting Towers and to respect the important historic character of the George Washington Memorial Parkway, as well as the Washington Street Guidelines and Standards, the Historic District, and these properties location as a gateway to the City, will come through innovative ongoing, community planning and collaboration; and

WHEREAS, the lack of certainty over the future ownership of Hunting Towers makes it difficult to successfully carry out holistic community planning, as well as to create specific Hunting Towers affordable housing plans;

NOW, THEREFORE, BE IT RESOLVED, THAT THE ALEXANDRIA CITY COUNCIL:

1. Affirm to the community its strong desire to preserve as much affordable, workforce housing as possible throughout the City including, if possible, all 530 units of Hunting Towers, provided, however, that due consideration should be given to the Washington Street Guidelines and Standards, the Historic District, and these properties location as a gateway to the City;

2. Continue to take all reasonable actions to persuade VDOT and the Kay-Cecchi interests to expedite negotiations and to enter into an agreement as quickly as possible for the disposition of Hunting Towers;

3. Direct City staff to report to Council, the Affordable Housing Advisory Commission, and the Hunting Creek Stakeholders Group monthly on progress towards this objective;

4. Direct City staff to prepare a report to Council concerning the additional borrowing capacity of the one-penny affordable housing set-aside;

5. Send a copy of this Resolution to Governor Kaine, the City's legislative delegation, the Virginia Secretary of Transportation, the Commissioner of the Virginia Department of Transportation, as well as to the Virginia Office of the Federal Highway Administration (FHWA), to encourage them to continue to take actions within their purview and with all deliberate speed to help the City of Alexandria remain a community where any person can expect to find affordable housing; and

6. Send a copy of this Resolution to Senators Warner and Webb, and Congressman Moran, accompanied by a letter asking that (a) the resolution be placed in the Congressional Record and referred to the Congressional committees, as appropriate, and (b) they contact and write FHWA to urge the federal government to assist in ensuring that sale negotiations are expedited.

ADOPTED: May 8, 2007

[Signature]
WILLIAM D. EUILLE
MAYOR

ATTEST:
[Signature]
Jacqueline M. Henderson, CMC
City Clerk
RESOLUTION NO. 2501

WHEREAS, Hunting Towers apartments (currently marketed as Hunting Point on the Potomac), which are located at 1202 and 1204 South Washington Street and which were constructed in 1950, provide 530 units of needed market affordable and workforce rental housing in the City;

WHEREAS, the City values Hunting Towers’ past, present and future role as a housing resource which immeasurably contributes to Alexandria’s strategic goals and core values of affordable housing, diversity and economic sustainability;

WHEREAS, the City is committed to seeking to preserve, a continuum of affordable and workforce housing options for current and future residents of Hunting Towers, as well as for renters elsewhere, so that Alexandria may continue to be a first home, as well as a final home to those who wish to live here;

WHEREAS, the City has continually expressed to VDOT, as well as to public and elected leaders at the federal, state and local levels, including in its prior Resolution 2227 adopted in May 2007, as well as in subsequent communications with VDOT and other stakeholders and representatives, the importance of preserving Hunting Towers as an affordable and workforce housing resource, and the City’s commitment to participate, collaborate and provide support, within its means, to achieve this outcome;

WHEREAS, the Virginia Department of Transportation (VDOT) purchased Hunting Towers in November 2001 as part of the Woodrow Wilson Bridge project;

WHEREAS, pending approval from the Federal Highway Administration (FHWA), VDOT now intends to sell Hunting Towers and has initiated a sale process which will include: (a) a request for non-binding expressions of interest from potential purchasers accompanied by a financing plan, (b) a subsequent offer by VDOT to the original owner to exercise its right-of-first refusal to re-acquire Hunting Towers at its current fair market value, (c) in the event the original owner does not or cannot exercise its first refusal right to re-acquire at fair market value, then the local government where the property is located (i.e., the City) may seek to acquire Hunting Towers from VDOT at a market price determined by VDOT, and finally (d) if these actions do not result in a sale, VDOT will undertake a sealed bid sale process open to all bidders;

WHEREAS, in these various sale process steps planned by VDOT, each potential buyer will likely undertake due diligence in preparation for a potential acquisition of Hunting Towers;

WHEREAS, potential buyers’ bids will be influenced by what they understand the future development potential of the Hunting Towers property to be;

WHEREAS, potential buyers need to clearly understand the existing zoning on the property and how that influences what can or cannot be constructed on the Hunting Towers property;

WHEREAS, under the City’s zoning, Hunting Towers is a noncomplying property in regard to its existing height, setback, parking, and other regulations;

WHEREAS, the Hunting Creek Area Plan, the Washington Street Standards and Guidelines, and other zoning requirements, as well as local and federal requirements to protect the unique natural land and water environment immediately surrounding the property, all significantly limit Hunting Towers’ future redevelopment options; and

WHEREAS, it is required that any redevelopment of the Hunting Towers property conform to the City’s zoning and all local as well as federal environmental requirements governing the property;

NOW BE IT THEREFORE RESOLVED THAT the City Council of the City of Alexandria, Virginia, hereby states that it reaffirms the City’s current zoning and environmental requirements with regard to the Hunting Towers property as appropriate for this site.
BE IT FURTHER RESOLVED THAT the City Council of the City of Alexandria, Virginia hereby states that it will use tools and resources available to the City in order to work with the eventual acquirer of Hunting Towers to help maintain Hunting Towers as a market affordable and workforce housing asset.

BE IT FURTHER RESOLVED THAT the Mayor will communicate this reaffirmation of existing zoning to VDOT and request them to inform all prospective buyers of the Hunting Towers property of these existing zoning and environmental requirements.

Adopted: May 22, 2012
City of Alexandria, Virginia

WILLIAM D. EUILLE  MAYOR

ATTEST:

Jacqueline M. Henderson, MMC City Clerk
TRANSACTIONAL DISCLOSURE STATEMENT
UNDER STATE AND LOCAL GOVERNMENT CONFLICT OF INTERESTS ACT
for Members of Alexandria City Council
and of Other City Boards and Commissions and for
City Officers and Employees
Virginia Code § 2.2-3115(G)

1. Name: Alicia Hughes

2. Member of: ☑ City Council (City Office or Department)

3. Transaction: #15 Docket/Agenda Item 5/22/12 Meeting Date (Other)

4. Nature of Personal Interest Affected by Transaction:

5. I declare, in light of my above-described personal interest in the identified Transaction (check one of the following):

   a. ☐ That I am required to disqualify myself from participating in the Transaction.

   b. ☑ That, although I am not required to disqualify myself, I have nonetheless elected to disqualify myself from participating in the Transaction.

   c. ☐ That I am a member of a business, a profession, an occupation or a group, all the members of which have a personal interest in the Transaction, and that I am able to participate in the Transaction fairly, objectively and in the public interest.

   5/22/12 Date

   Signature