

20
6-13-26

June 12, 2026

Dear Mayor and Members of the City Council

I am a long-time Alexandria resident with more than 25 years in environmental regulatory work involving oil, gas, and industrial operations and property transactions of this kind. I support redeveloping this site and offer these comments only to help the Council protect city resources and taxpayers. Each item below is a question or a protection I would expect to be addressed in a transaction like this one; I respectfully urge the Council to obtain answers, and to build these protections into any agreement, **before** it commits public funds. A fully cited memorandum is available on request.

- **Whether the subsidy is necessary.** Acquiring, demolishing, and remediating contaminated industrial sites is this developer's core business, and it is backed by a multibillion-dollar financial enterprise; the cleanup was a known cost priced into a discounted purchase.
 - HRP Potomac, LLC is a project entity of Hilco Redevelopment Partners, part of Hilco Global — which since September 2025 has been a majority-owned subsidiary of ORIX Corporation USA, the U.S. arm of Japan's publicly traded ORIX Corporation, an asset-management group with roughly \$91.3 billion in assets.
 - At a comparable Hilco-redeveloped site — the former Sparrows Point steel mill in Baltimore, which Hilco Redevelopment Partners acquired and redeveloped through the Tradepoint Atlantic joint venture — a Tradepoint executive, senior vice president Aaron Tomarchio, said a tax-increment financing subsidy *"isn't a requirement for redevelopment to continue"* and that without it the project would only take longer to move forward. (Baltimore Sun, "Tradepoint Atlantic to seek TIF funds," Sept. 2018).
- **The cleanup cost is unknown.** The developer's own consultant states the most contaminated areas cannot be characterized until the building is demolished. Any financing should be conditioned on a defined scope, a firm not-to-exceed cap, developer responsibility for overruns and newly discovered conditions, and regulatory closure as a condition of payment.
- **Environmental liability and insurance.** The framework does not address environmental indemnity to the City or pollution insurance, and under federal Superfund law the owner of contaminated land can be liable for its cleanup. Because the City may accept ownership of land here, the Council should have its counsel examine whether the City could inherit cleanup liability, and should require indemnity and insurance.
- **The unremediated parcel next door.** The adjacent Pepco substation — apparently upgradient, still in industrial use, and not publicly characterized — lies outside the cleanup. Contamination can migrate across the line and recontaminate the remediated site, so the City should require boundary monitoring and keep the owners responsible for migrating contamination rather than releasing them at "completion."
- **Contamination left in place, by the river.** The 2024 plan would cap and re-use contaminated soil on-site — within 200 feet of water the plan calls a drinking-water source, and within the 25-year floodplain — rather than remove it. Caps on a tidal riverfront must be maintained indefinitely and can fail with flooding. The City's own former gas-plant site at Lee/Oronoco Street, which kept discharging to the Potomac for decades, is the cautionary example.
- **Key documents the public has not seen.** The developer's 2020 pre-purchase environmental study and its detailed remediation and cost reports are not public. These should be produced before any vote, so the Council and residents can see what was known and priced.
- **No independent verification.** The financing rests on the developer's own figures, including the "but for" finding the City made using them. The Council should obtain an independent financial and environmental review — independent of the developer and of the Alexandria Economic Development Partnership — made public before any authorizing vote.
- **Same-day hearing and vote.** The only public hearing and the authorizing vote are both set for June 13. Please consider separating them, so the protective terms can be written and reviewed before they are approved.

Thank you for your consideration of these comments.

Regards,

Laura Williams



Kenneth W. Wire
kwire@wiregill.com
202-431-3624

June 12, 2026

VIA EMAIL TO paul.stoddard@alexandriava.gov

Mayor Gaskins and Councilmembers
301 King Street, Suite 2100
Alexandria, VA 22314

**RE: Docket Item 20 - PRGS Redevelopment
Coordinated Development District #30**

Dear Mayor Gaskins and Councilmembers

On behalf of my client, HRP Potomac LLC, I respectfully request the following amendments to the recommended conditions of approval for Coordinated Development District #30 (the "CDD") related to the timing of the delivery of the public open spaces for each block.

The recommended change to the existing CDD conditions does not take into consideration the financial implications of capitalizing a project with a requirement that impedes the issuance of half of a building's certificates of occupancy, which is a risk that debt and equity providers will not tolerate, creating substantial capitalization risk for the project.

For the ease of review at the City Council hearing, I have consolidated the repeated subsections included in CDD Conditions 30(b), 30.1(b), 31(b), 31.1(b) and 32(b) with the Planning Commission recommended additions shown as a single **bold underline** and our requested changes shown in a yellow highlight or ~~strike through~~.

CDD CONDITIONS 30(b), 30.1(b), 31(b), 31.1(b), and 32(b)

Provide substantial completion of the following improvements **(excluding limited punch list items to the satisfaction of the Director of P&Z and adhering to the Landscape Guidelines)** and open the following areas to the public within 90 days of the issuance of the 50 percent certificate of occupancy or prior to issuance of any certificates of occupancy past the first ~~50~~ 90 percent of residential units, whichever occurs first:

I look forward to discussing these applications and these requested changes to the staff recommended conditions of approval with you at tomorrow's City Council hearing.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kenneth W. Wire", with a stylized flourish at the end.

Kenneth W. Wire

City of Alexandria, Virginia

MEMORANDUM

DATE: JUNE 12, 2026

TO: MAYOR GASKINS AND MEMBERS OF CITY COUNCIL

FROM: PAUL STODDARD, DIRECTOR,
DEPARTMENT OF PLANNING & ZONING DIRECTOR Paul Stoddard

SUBJECT: DOCKET ITEM 20: CDD#2025-00004 & DSUP#2025-10011 THROUGH 10014 - PRGS

Digitally signed by Paul
Stoddard
Date: 2026.06.12 15:14:47
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ISSUE: Proposed CDD Conditions to Address Power Plant Deconstruction and Site Stabilization

SUMMARY:

Recent discussions regarding this project have emphasized the importance of safely remediating the power plant. The applicant has reiterated their commitments to safely deconstruct and remediate the plant. The applicant has presented to the community and Planning Commission that it plans to (1) deconstruct the power plant structure prior to occupancy of the first development block and (2) the power plant site north of Block C will be stabilized after deconstruction until development on blocks D, E and F commence. To align the development conditions with the applicant's intentions, staff proposes adding the following conditions to the CDD#2025-00004 Concept Plan Amendment.

DISCUSSION:

Conditions 28.1 and 28.2 are proposed to further clarify the sequence of site deconstruction and phasing:

- 28.1 No certificates of occupancy will be issued for blocks B or C until the above-grade power plant is completely abated and removed.**
- 28.2 If construction mobilization for blocks D, E or F has not begun after the finalization of deconstruction of the above-grade power plant structures, the area east of Road A and north of Block C shall be protected and inaccessible to the public via a fence and the ground will be stabilized to mitigate potential dust and erosion and to ensure that any contaminated surface soils (if applicable) are not accessible.**

Staff supports the proposed condition language as it provides further requirements that the power plant will be removed from the site entirely prior to any public site access and readily available guidance on the site condition that should be provided on the portion of the site where the power plant currently stands if no imminent construction is planned after deconstruction. Specifically proposed Condition 28.2 builds upon State and City requirements for mitigating impacts on brownfield sites.

STAFF:

Jesse Maines, Division Chief, T&ES

Robert M. Kerns, AICP, Chief of Development, P&Z

Catherine Miliaras, Principal Planner, P&Z

Nathan Imm, Principal Planner, P&Z

Michael Swidrak, Urban Planner, P&Z