From:	(b) (6)
Sent:	Sunday, July 31, 2022 9:30 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Metropolitan Washington District of Columbia Coastal Storm Risk Management
-	Feasibility Study

Dear U.S. Army Corps of Engineers,

While I appreciate the efforts of the U.S. Army Corps of Engineers to prevent flooding in our community, I have some serious concerns about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. Specifically, I am concerned about the proposal to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View, and River Tower Condominiums, where I live.

The plan is troubling because it does not address stormwater flooding, which has already proven to be a significant problem in our area. The project may actually increase River Towers' risk of flood and impede flood waters that flow downwards from Wakefield Drive towards the wetlands and Potomac River below.

In addition, the current plan includes destruction of property and will negatively impact the property values of the affected neighborhoods, including my home in River Towers located on 6631 Wakefield Drive. Many residents of River Towers moved here in part to live next to a wetland and view wildlife. Our existing view of the National Park Service's Dyke Marsh is stunning. I never tire of walking into our lobby and seeing water sparkling in the sunlight through the glass door across from our entry doors. However, our views of Dyke Marsh would be complete blocked by the wall if the plan is implemented. It's unclear why the wall would need to be so close to the building and why it would need to be so high that residents would not be able to see over it. Our amenities would also be affected, including the tennis courts and grounds. It also appears to impact the picnic grove and access to our community gardens. The plan does not address how we would be compensated for the loss of property values and amenities.

Further, the current plan would destroy many of our natural resources, including trees and wetlands, which naturally mitigate flooding and global warming, and which should be enhanced, not destroyed. The plan negatively affects Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County. Finally, the plan does not address how wildlife will traverse the flood wall and levee.

Instead of the current plan, we hope that you will reconsider other water mitigation options that were proposed earlier by the Army Corps, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for your consideration of my concerns.

Sincerely,



From:	(b) (6)
Sent:	Sunday, July 31, 2022 8:50 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Belle Haven / New Alexandria Levee and Floodwall

To Whom it May Concern:

I am a home owner and resident of the New Alexandria (Belle Haven) neighborhood and am responding to the request for comments from the June 16, 2022 virtual meeting related to the NOVA Coastal Study by the USACE and the posted draft Integrated Feasibility Report and Environmental Assessment.

I would like to convey my strong opposition to the concept Belle Haven Levee and Floodwall, which proposes building a 6.5 foot concrete floodwall along the east side of Boulevard View. While I am concerned about climate change, rising sea levels, and the potential for increased flooding, I do not believe that the proposed concept should move forward for a number of reasons, outlined below:

1) A floodwall for Belle Haven has already been considered in the past through 2008 and 2014 evaluations, but did not proceed due to community opposition (as noted in the report). Since those evaluations, no major flood events have occurred in the neighborhood that would trigger a need for reevaluation

2) The floodwall will negatively impact home values in the neighborhood, particularly for owners on Boulevard View, whose homes would face an unsightly concrete wall, would lose river views, and lose many trees on both sides of Boulevard between their homes and the traffic on the GW parkway (as noted in the report, all trees within 40 feet of both sides of the wall would be cut down)

3) The wall would fundamentally change the character of the neighborhood, limiting resident's walkable access to the river, Belle Haven Park, Mount Vernon trail, and the Dyke Marsh, which are highly valued local recreation points

4) A 1.2 Benefit-Cost-Ratio (BCR) is not compelling. A 20% expected benefit from an investment of this magnitude is razor thin. I am not confident that this level of benefit justifies the cost given error margins with assumptions in any model, not to mention the high likelihood of cost overruns in any public works project. Furthermore, the benefit does not factor in costs borne by individual residents from construction of the wall--negative externalities including reduced home values and the everyday impact of construction noise and road disruptions

As noted in the meeting, the original alignment by government agencies was on developing a floodwall / levee on the east side of the GW parkway; however, it was stated that the National Parks Service was not willing to convey land for construction. Why impact individuals' homes in Belle Haven neighborhood rather than use public land in Belle Haven Park for public benefit from a public project? If there is widespread community support and a barrier is to be built, it should be on the East side of the GW Parkway.

Thank you for your consideration, and I appreciate the time and openness to public input.

#### (b) (6)

From:	(b) (6)
Sent:	Sunday, July 31, 2022 8:12 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Comment to Flood Wall Proposal

To Whom It May Concern:

My husband and I live on Boulevard View, and we are writing to strongly disagree with the proposal to build a flood wall. We moved to the Belle View neighborhood three years ago after purchasing our first home. We love the 1930s brick colonial home we purchased with views of the Potomac and the bucolic neighborhood of Belle View. We specifically purchased a home in the Belle View neighborhood due to the easy access onto the George Washington Parkway for our daily commute. Further, we love the outdoors and often walk across the GW Parkway after work and on the weekends to enjoy the Mount Vernon Trail. When we learned of the proposed flood wall, we were shocked and upset by the proposal since a flood wall would destroy our bucolic neighborhood, preclude easy access onto the GW Parkway, and devalue our home.

A flood wall will eliminate the mature tree growth in our neighborhood along Boulevard View, including the mature trees in our front yard. I grew up in south Louisiana and have lived through both Hurricane Andrew in Louisiana and Hurricane Katrina in Mississippi. I also have a brother and sisterin-law who lost their home and all their belongings almost a year ago during Hurricane Ida. My personal experience means that I know the initial estimate of the easement needed on either side of the wall (approximately 10-15 feet) is grossly conservative. For a flood wall to work properly, nothing can threaten breaching the wall. Specifically, mature trees will not be able to remain in order for the flood wall to do its job if there is a major storm. My brother and sister-in-law had to tear down their south Louisiana home this summer not because of flood waters but because of trees. Two mature trees fell through the roof in two separate places in their home during Hurricane Ida, which resulted in a total loss. The building of the wall will result in all the mature trees on the federal parkland in front of our home and the trees in our front yard needing to be cut down. Our neighborhood is home to much wildlife, and a flood wall would destroy their natural habitat. Cutting down trees completely changes the nature and the character of the neighborhood. It also devalues our property. Our landscaping relies on trees, as we have many shrubs and perennials that thrive in shady locations. We will need to completely redo our landscaping in our front yard. Currently, our neighborhood feels like an extension of the Mount Vernon Trail. We have so much wildlife, and our established landscaping provides a habitat for that wildlife. We do not want our bucolic way of life and the wildlife habitat in our neighborhood to be destroyed.

Finally, the infrastructure in the Belle View and Belle Haven neighborhoods cannot sustain losing access to the GW Parkway due to a flood wall. Under the current plan based on where the wall will be located, everyone will all have to funnel to Fort Hunt Road. Fort Hunt Road is already overcrowded with traffic heading to and from Route 1, especially at rush hour. The Belle View neighborhood losing its access to the GW Parkway would overwhelm Fort Hunt Road.

We implore the US Army Corps of Engineers to consider those who live directly on Boulevard View and will be directly impacted by this flood wall. We do not want a permanent eyesore that would drastically alter our way of life. We appreciate your time and consideration.

Sincerely,



From:	(b) (6)
Sent:	Sunday, July 31, 2022 7:41 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Flood Wall Plan for River Towers Condominium

To Whom It May Concern:

As a resident of River Towers condominium, I have serious concerns about the plan proposed by the U.S. Army Corps of Engineers (USACE) and Fairfax County's Office of Environmental and Energy and Coordination (OEEC).

While I acknowledge and agree that something must be done, I categorically **disagree** with the particular plan as proposed. There are other, better approaches to the problem that deserve further consideration.

Their currently proposed plan would involve taking *about 30% of River Towers property* by eminent domain, and would involve the construction of a flood wall, levee, and pumping station on what is now our property.

Those constructions would severely impact our access to amenities, including the tennis and basketball courts, playground, picnic grove, parking lots, and garden as well as our view. It would involve noisy and invasive construction adjacent to all three buildings.

#### It will negatively affect our property values in a critical way.

The proposed plan would only address tidal flooding, but NOT water from storm runoff, which has caused flooding in our community previously.

The wall could affect residents' ability to evacuate the 6621 and 6631 buildings in the event of an emergency and could actually cause flood waters to pool around and inside River Towers.

Therefore, I absolutely agree with the River Towers Condominium Owners Association Board of Directors which opposes the proposed plan.

I have attended community meetings held by the USACE and OEEC to learn more details, ask questions, and discuss alternatives.

Dan Storck, Mount Vernon District Supervisor, Fairfax County Board of Supervisors, attended our board meeting. He understands and shares the concerns of River Towers residents, and is not in favor of the chosen plan. Together, we hope to advocate

for other approaches that better meet the needs of our community and do not negatively affect River Towers and the surrounding environment.



From:	(b) (6)
Sent:	Sunday, July 31, 2022 5:06 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study



Dear U.S. Army Corps of Engineers,

We write to you with our serious concerns about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. While we greatly appreciate your investment in helping to prevent flooding to structures in our community, we, nevertheless, have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

- It does not address stormwater flooding, which has already proven to be a significant problem in our area. It is
   <u>of particular concern to us that the project may actually impede flood waters that flow downwards from
   Wakefield Drive towards the swampy area below.

  </u>
- It does not address the aesthetic and pragmatic needs of the community and the loss of amenities
- The current plan includes destruction of property and will negatively impact the property values of the affected neighborhoods, especially the 6631 Wakefield Drive part of River Towers Condominiums. It is unclear to us why the project needs to intrude so close to this building and the need for the exceptional height of the flood wall.
- The current plan would destroy many of our natural resources, including trees and wetlands, which naturally mitigate flooding and global warming, and which should be enhanced, not destroyed
- The plan negatively affects Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County
- The plan does not address how wildlife will traverse the flood wall and levee

Instead of the current plan, we hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for your attention to our concerns.

Sincerely yours,



Copies: Relevant governmental officials and legislators

From: Sent:	(b) (6) Sunday, July 31, 2022 3:32 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (b)
Subject:	[Non-DoD Source] NOVA Coastal Study comments

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. The Belle View area faces an increasing flood risk, and I appreciate that you are invested in helping our community. As a board member for the Friends of Dyke Marsh and a resident of River Towers, I have a personal interest in both flood risk management and environmental protection.

I have concerns about the specific proposal in the study for the USACE to build a floodwall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. These include the following:

• The eco-friendly measures for protecting coastal communities developed after Superstorm Sandy aren't included in the alternatives. Why not? We have the largest freshwater tidal wetland in the DC metro area (plus NPS land all along the river): please expand the list of alternatives to include more detail on these options. (reference: Corps of Engineers' North Atlantic Coast Comprehensive Study Report (Blockedhttps://www.nad.usace.army.mil/CompStudy/)

• The upper coastal storm surge barrier was dropped from the list of alternatives because it provides benefits to DC and MD, neither of which was a cost-sharing partner for the study. However, it might be a great regional solution, and it would be worth including the areal extent and dollar value of potential benefits from the CH2MHill 2015 report, just to give us some idea of its value. (If the dollar benefits were not computed in that study, please consider doing a back-of-the-envelope calculation – if Fairfax County will authorize the time spent.) We rely on the Corps as the only agency that can champion alternatives that cross jurisdictional boundaries. The storm surge barrier deserves a better analysis.

• The plan negatively affects Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County

• An Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) do not seem appropriate for a plan that involves over a mile of floodwall and levee. This is especially true when the floodwall / levee separates Dyke Marsh from its feeder streams and upland watershed.

 $\cdot$  The plan does not address how wildlife will traverse the floodwall and levee. Many species of turtles live in the marsh but lay eggs in the upland areas. These would be cut off by the floodwall and levee.

• There are no alternative alignments given for the floodwall / levee. What other options are there? Are there combinations of floodproofing measures with a different floodwall/ levee alignment that would protect the community?

• There is no precise description of the location of the levee: it appears to go through the picnic area on River Towers property. There is also no description of its finished width or the width of the area that must be cleared for construction.

- There is no discussion of the impacts of the levee:
- o Would the levee make the picnic area unusable?
- o There is a large grove of mature trees; how many would have to be removed?
- o How would residents (able and disabled) reach River Towers property on the other side of the floodwall / levee?
- Would the levee be public access? What impacts would that have on our private property?

• The study mentions two streams (Belle Haven East and West Channels). There is a third stream: a small stream that crosses River Towers property between the picnic area and the community garden area. What is the provision for this stream? This stream drains the Westgrove Dog Park (carrying dog urine and fecal matter); during storm events, the streamflow goes out of bank and across the picnic area. The levee would block this flow and keep it inside the picnic area. How is this considered in the proposed plan?

Instead of the current plan, I hope that you will re-consider other flood mitigation options in more detail, including funding additional

Thank you for taking the time to read my letter.

Sincerely,



From:	(b) (6)
Sent:	Sunday, July 31, 2022 1:40 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] DC Metro CSRM Study

Dear U.S. Army Corps of Engineers,

I deeply appreciate that you are invested in helping prevent tidal flooding to structures in our community. However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County.

I understand the importance of preparing for more severe tidal flooding as climate change progresses, sea levels rise, and weather becomes more severe. However, our area is already subject to significant stormwater flooding, which the new plan will not address; I am concerned that the flood wall may actually worsen the existing stormwater flooding by preventing it from draining into Dyke Marsh. The plan negatively impacts Dyke Marsh itself, which is a sensitive wetland ecosystem and part of a Resource Protection Area designated by Fairfax County. The existing trees and wetlands of Dyke Marsh already naturally help to absorb floodwater and mitigate impacts of climate change; destroying them in the interest of preventing floods is counterintuitive and needlessly disruptive. I believe Dyke Marsh and other natural resources in our area should be enhanced rather than further damaged by an extended construction project.

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.

Sincerely,



From:	(b) (6)
Sent:	Sunday, July 31, 2022 9:01 AM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[URL Verdict: Neutral][Non-DoD Source] Comments RE DC Metro CSRM Study
Attachments:	Final_USACE Metro DC CSRM comment letter.pdf

Dear Ms. Perkins and Project Team,

On behalf of the signed organizations, please accept the attached comments in reference to the USACE Metro DC CSRM study. We look forward to continuing to work together to reduce flood risk to our communities and improve resiliency.

Best, Emily



EMILY E. STEINHILBER Director, Climate Resilient Coasts and Watersheds, Virginia

Environmental Defense Fund





Growing Returns Blog edf.org

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Katie Perkins Project Manager U.S. Army Corps of Engineers Baltimore District 2 Hopkins Plaza Baltimore, MD 21201

July 30, 2022

### RE: Draft Integrated Feasibility Report / Environmental Assessment for the Metropolitan Washington, District of Columbia Coastal Storm Risk Management Study

Dear Ms. Perkins,

On behalf of our members in Virginia, the undersigned environmental and conservation organizations respectfully submit the following comments in response to the U.S. Army Corps of Engineers' (Corps) Draft Integrated Feasibility Report / Environmental Assessment for the Metropolitan Washington, District of Columbia Coastal Storm Risk Management (CSRM) Study. The purpose of this CSRM study is to evaluate solutions to reduce long-term coastal flood risk to vulnerable populations, properties, infrastructure, and environmental and cultural resources, while considering future climate and sea level change scenarios to support resilient communities in Northern Virginia within the Middle Potomac River watershed.

We appreciate the amount of work that went into the study and the extension of the public comment period. However, we have several concerns with the findings, notably the failure to incorporate best available science and holistic flood risks into the study analysis, the minimal opportunities for meaningful public engagement within the last 18 months, the failure to include natural- and nature-based features (NNBF) in the analysis and Tentatively Selected Plan (TSP), and the incomplete assessment of potential environmental impacts. Our concerns and recommendations are further detailed below.

#### 1. Examine holistic, long-term flood risk due to climate change.

#### a. The study fails to analyze multiple sources of flood risk using best available science.

The vulnerability assessment included in the study (page 80) fails to adequately identify the planning scenarios utilized in the study, including relative sea level rise (SLR) curves and annual exceedance probability scenarios. Though it is not clearly stated in the study, if the Corps' SLR curves from 2013 are utilized, we recommend using the permitted alternate projection from the National Oceanic and Atmospheric Administration's (NOAA) 2017 Technical Report (NOS CO-OPS 083) or preferably NOAA's 2022 SLR curves<sup>1</sup>, considered to be the best available science for the federal government.

<sup>&</sup>lt;sup>1</sup> Sweet, W.V., B.D. Hamlington, R.E. Kopp, C.P. Weaver, P.L. Barnard, D. Bekaert, W. Brooks, M. Craghan, G. Dusek, T. Frederikse, G. Garner, A.S. Genz, J.P. Krasting, E. Larour, D. Marcy, J.J. Marra, J. Obeysekera, M. Osler, M. Pendleton, D. Roman, L. Schmied, W. Veatch, K.D. White, and C. Zuzak, 2022: Global and Regional Sea Level Rise Scenarios for the United States: Updated Mean Projections and Extreme Water Level Probabilities Along U.S. Coastlines. NOAA Technical Report NOS 01. National Oceanic and Atmospheric Administration, National Ocean

As the foundation upon which the coastal storm surge models are based, it is surprising the Corps has not chosen to utilize the best available science from NOAA – for which the Corps provided input during development.

As noted in the study, "the Northern Virginia region supports densely populated areas encompassing trillions of dollars of largely fixed public, private, and commercial investment. Coastal communities in this region must begin to consider long-term coastal storm risk" (page 5). However, this study fails to adequately consider all long-term flood risks for coastal communities in the region. Although the study's data focuses predominantly on coastal storm surge, the phrase 'coastal flooding' is used frequently. This terminology is misleading to the public, as the study does not analyze impacts and develop effective solutions to multiple sources of flooding, or use best available data with regards to relative SLR, but only examined how SLR will exacerbate coastal storm extreme events over the study period. The study notes that "riverine flooding along the Potomac River and its tributaries exacerbates coastal flooding" (page 6) but the Corps has failed to sufficiently model riverine flood risk; additionally, the study notes that "the most common flooding problem in [the Belle Haven] region is due to summer thunderstorms with high-intensity short duration rainfall" (page 11) but the Corps has failed to incorporate precipitation projections into the analysis. In the study, rainfall events and relative SLR are viewed as residual risks but the economic, social, and environmental costs are far too great to ignore and should be incorporated into the Corps' analysis.

Recognizing that climate change is driving increased intensity and duration of rainfall events, Virginia Department of Transportation (VDOT)<sup>2</sup> is already requiring bridge designs to factor in a 20% increase in rainfall intensity and 25% increase in discharge. Additionally, several efforts are underway to update statewide precipitation projections and modeling. The Mid-Atlantic Regional Integrated Sciences and Assessments (MARISA) Program, with funding from the Chesapeake Bay Trust, VDOT and the Commonwealth Center for Recurrent Flooding Resiliency, updated Intensity-Duration-Frequency curve data for the entire commonwealth and is available online<sup>3</sup>. With contributions from six mid-Atlantic states including Virginia, the Federal Highway Administration is leading the update of NOAA Atlas 14 data is also currently being updated and is scheduled to be completed by summer 2024.

By excluding best available science on SLR projections and precipitation changes due to climate change, the study fails to analyze impacts and develop effective, holistic solutions that address the compounding flood risks facing Northern Virginia communities. This is a short-sighted choice that will leave over 2.5 million Virginians exposed to current and future chronic flood risk from SLR and extreme precipitation, and one that is out of step with actions that Virginia is already taking to consider multiple sources of flood risk. Instead, the Corps should take a holistic approach to flood resilience that integrates social, economic, and environmental systems so they function and adapt together for improved outcomes.

Service, Silver Spring, MD, 111 pp. https://oceanservice.noaa.gov/hazards/sealevelrise/noaa-nostechrpt01-global-regional-SLR-scenarios-US.pdf

<sup>&</sup>lt;sup>2</sup> Virginia Department of Transportation report, Considerations of Climate Change and Coastal Storms: https://www.virginiadot.org/business/resources/bridge/Manuals/Part2/Chapter33.pdf

<sup>&</sup>lt;sup>3</sup> Projected Intensity-Duration-Frequency (IDF) Curve Data Tool for the Chesapeake Bay Watershed and Virginia https://midatlantic-idf.rcc-acis.org/.

#### b. The study fails to consider residual risks within the authorized project area.

Additionally, because the study area of Northern Virginia is geographically smaller than the authorized project area of the Metro Washington, D.C. area, we have concerns about the study's failure to consider impacts to Ward 8 in D.C. and Prince George's County in Maryland. The study notes that constructing a levee in Belle Haven would cause waters to stage higher during a flood event, and yet the Corps has failed to model potential impacts to residents in these nearby communities because they are outside the modified study area. However, a flood event would surely impact both banks of the Potomac – including predominantly Black communities in Prince George's County and historically underserved and predominantly Black communities in Ward 8. The study also notes the coastal model will be re-run for the with-project condition to ensure flooding is not exacerbated elsewhere in the system with implementation of the TSP but does not specify if this will consider impacts, residual risk, and the potential for economic damages specifically in Ward 8 and Prince George County. The study also fails to incorporate the costs of mitigation measures into the benefit-cost analysis (BCA), which could potentially alter the TSP if project costs escalate due to mitigation measures. It is surprising the Corps has elected not to conduct a wave deflection study for inclusion in the study because the Belle Haven floodwall would likely alter water circulation patterns, may cause induced flooding across the Potomac, and could in fact exacerbate flooding in Alexandria in case of catastrophic failure or overtopping of the wall.

Combined with a lack of public engagement and awareness-building on the part of the Corps within the authorized project area, we are concerned that the TSP could cause induced flooding in these communities and both officials and residents will be unaware of their potential increased flood risk due to the floodwall until they are impacted by a flood event. To promote transparency, the Corps should conduct a wave deflection study and fully analyze the environmental and economic impacts of the Belle Haven levee and floodwall alternative 5c, including for Ward 8 and Prince George's County, to inform the selection of the final preferred alternative.

### c. The TSP may put critical infrastructure at risk by failing to consider comprehensive flood risk.

The Arlington Water Pollution Control Plan (WPCP) is critical infrastructure that does need to be protected from current and future climate impacts and flood risk. However, the study's analysis of the WPCP floodwall proposed in alternative 4c is inadequate because it fails to consider all flood risk potential for the WPCP, including increased intensity, duration, and frequency of precipitation. This failure to consider holistic sources of flooding will inevitably put this infrastructure at risk and could lead to negative impacts for water quality and human health in the case of a combined sewage overflow and/or electrical loss at the plant due to inundation during a flood event. This was flagged as a concern in the June 16 virtual public meeting and has also occurred in past storms such as Superstorm Sandy in 2012.<sup>4</sup>

Again, it is surprising the Corps has elected not to conduct a wave deflection study on the WPCP floodwall. It is also concerning that the Corps has not identified any potential nonstructural measures necessary for alternative 4c including elevation, equipment upgrades, and other resilience

<sup>&</sup>lt;sup>4</sup> Climate Central report, Sewage Overflows from Hurricane Sandy: <u>https://semspub.epa.gov/work/02/210346.pdf</u>.

measures to reduce the risk of combined sewage overflows in the case of catastrophic failure or overtopping of the floodwall. We recommend the Corps conduct a wave deflection study as well as a more complete assessment of nonstructural measures to increase the flood resilience of critical equipment and infrastructure in the WPCP.

#### 2. Increase community engagement in the study area.

Virginia's <u>Coastal Resilience Master Plan</u>, completed in 2021, estimates Northern Virginia residents will experience \$23.8 million in annualized residential structure losses by 2080 without action, an increase of over 1,200% from 2020; likewise, non-residential annualized structure losses are expected to increase from less than \$8 million annually to \$37.2 million annually by 2080. With <u>over 2 million</u> people living within the CSRM study area, trillions of assets in the form of private, public, and commercially owned property – including critical defense and transportation infrastructure including the Pentagon and Reagan National Airport – the Corps has a responsibility to ensure public awareness of and engagement in the project development.

Because this CSRM was paused in 2019, restarted in 2021, and publicly noticed in June of this year, there has been limited opportunity for public engagement and awareness building about this process, including its potential environmental and community impacts. We strongly urge the Corps to include additional public meetings in the impacted communities, both in Belle Haven and the neighborhoods surrounding the Arlington Water Pollution Control Plant (WPCP). This should include additional in-person as well as virtual options to ensure community members can ask questions about the CSRM study, learn about the project alternatives analyzed and the TSP and provide their input in a meaningful way before potentially impactful decisions have been made without their knowledge.

It is notable that Corps project recommendations in 2008 and 2014, which included a combination levee and floodwall around the Belle Haven area, were not implemented due to community opposition. If the Corps intends to move forward with the TSP including the same type of project in the area, additional outreach and public engagement in partnership with the local sponsors will be critical. Further community engagement would also help elaborate, for instance, why the only alternative that would have benefit to an environmental justice community (5a) was not selected for inclusion in the TSP (page 148).

#### 3. Consider full suite of impacts and benefits, including natural- and nature-based features.

In this, as in all its CSRM studies, the Corps relies heavily on an economic analysis that is biased toward costly, environmentally damaging grey infrastructure when less expensive, nature-based solutions are available. The Corps' analysis of alternatives prematurely excludes solutions without providing the necessary comparison of potential benefits, costs, and damages including rising costs of construction. The faulty foundation of the Corps' BCA is a critical flaw that threatens to skew the Corps' economic conclusions in this study.

Given the Corps' authorization under this study authority to conduct ecosystem restoration in addition to floodplain management, we are disappointed that this study fails to evaluate the greater benefits to the community and the environment from multi-functional, nature-based solutions to flooding that may include ecosystem restoration as a co-benefit. Instead, the study focuses on traditional 'grey infrastructure' solutions. Grey infrastructure typically refers to human-engineered infrastructure for water resources, such as concrete seawalls, bulkheads, and groins. Grey infrastructure differs from NNBF that could deliver multiple benefits, including buffering from storms and flood storage capacity and incurs lower maintenance costs. The TSP includes a floodwall and levee to protect the Belle Haven community from coastal storm surge but could be improved by the inclusion of NNBF on both sides of the proposed floodwall. Additionally, although the study mentions the potential to incorporate NNBF and notes the TSP will include nonstructural measures, the study fails to include meaningful analysis of what that would entail.

Notably, both the Corps' Engineer Development and Research Center (ERDC) and the Engineering with Nature® Initiative (EWN) have internal resources, staff, and guidance on how to incorporate NNBF into coastal restoration and flood protection initiatives.<sup>5</sup> We strongly encourage the Corps to incorporate additional NNBF into the TSP to advance important co-benefits for community health, water quality, and ecosystem restoration such as described in the EWN International Guidelines on NNBF for Flood Risk<sup>6</sup> to meet the directive of the study authorization.

The study notes that incorporating a living shoreline along Alexandria's waterfront would necessitate justification through NER benefits if not coupled with flood protection measures (page 102). While this project was ultimately not included in the TSP, we encourage the Corps to consider NER that also accounts for risk reduction benefits beyond storm damage reduction, particularly given the compounding flood risks noted above and the inclusion of ecosystem restoration in the study's authorization. The City of Alexandria is constructing a living shoreline and additional NNBF as part of their Waterfront Improvement Plan thanks to a grant from Virginia Department of Conservation and Recreation's Community Flood Preparedness Fund. **The Corps could add value to this study by working with local sponsors to identify all potential projects where NNBF could be incorporated for flood protection as well as ecosystem and community co-benefits.** Armed with this analysis, local governments could seek out additional NNBF solutions.

### 4. Conduct additional analysis to ensure all reasonable alternatives are explored with sufficient public participation.

Under federal law, the Corps is required to select the least damaging practicable alternative. Without conducting a feasibility analysis of building a floodwall or implementing NNBF and hybrid approaches on the eastern side of George Washington Memorial Parkway (GWMP), the Corps cannot know if it has in fact selected the least damaging practicable alternative as its preferred alternative. As noted in the study, the National Park Service (NPS) is negotiating with FHWA over a 7-inch raising of the wall along the parkway and is very concerned about any impact to the parkway, including changes to the viewshed and its historic integrity. Notably, NPS broke ground on a \$161 million rehabilitation project for GWMP on July 18, 2022, which will include stormwater and road drainage improvements and be completed in late 2025. Yet, the study fails to consider how the TSP would impact the continued use and maintenance of GWMP in the face of future climate impacts,

<sup>&</sup>lt;sup>5</sup> Engineering with Nature Initiative, Nature-Based Solutions Guidance: <u>https://ewn.erdc.dren.mil/?page\_id=3348</u>.

<sup>&</sup>lt;sup>6</sup> Engineering with Nature Initiative, International Guidelines on Natural- and Nature-based Features for Flood Risk: <u>https://ewn.erdc.dren.mil/?page\_id=4351</u>.

both as a key transportation thoroughfare for the metro DC region as well as an iconic viewshed and historical and recreational resource.

The Corps' conclusions that the environmental impacts of the proposal would not be significant is premature, as the study has failed to adequately assess how the alterations of hydrology and flooding patterns resulting from the project could negatively impact areas outside the modified study area but within the authorized project area, and communities in Ward 8 and Prince George's County in particular. A full Environmental Impact Statement (EIS) is needed to evaluate these impacts and their significance, and it would also allow for the more robust consideration of NNBF alternatives and the much more extensive public engagement efforts that this project needs.

In other CSRM studies across the country, the Corps conducted a full EIS to consider potential environmental impacts to water quality, ecosystems, and community health of the potential alternatives. Should the Corps elect not to conduct a full EIS, the Corps should include far more extensive analysis of holistic flood impacts due to precipitation and utilize best available science for SLR projections; analyze the ways in which NNBF can be incorporated into the TSP; and include additional public meetings in impacted communities before further decisions are made.

Thank you again for your work on this important initiative to reduce long-term coastal flood risk to vulnerable populations, properties, infrastructure, and environmental and cultural resources in the face of climate change impacts in Northern Virginia. The decisions the Corps makes today will impact the communities who live, work, and recreate in the Metropolitan Washington D.C. region and environment for decades to come. We urge the Corps to be thorough and thoughtful to make the best decisions for our collective future. We appreciate the opportunity to provide input and stand ready to work with you and serve as a resource as this process moves forward.

Sincerely,

Tom Blackburn Advocacy Chair, Audubon Society of Northern Virginia

Victoria Higgins Virginia Director, Chesapeake Climate Action Network

Abel Olivo Executive Director, Defensores de la Cuenca

Emily Steinhilber Virginia Director, Climate Resilient Coasts & Watersheds, Environmental Defense Fund

Glenda Booth President, Friends of Dyke Marsh Elizabeth A. Martin President, Friends of Little Hunting Creek

Nancy K. Stoner President, Potomac Riverkeeper Network

Patrick L. Calvert Senior Policy Manager & Campaign Manager, Virginia Conservation Network

Chris Leyen Policy Director, Virginia League of Conservation Voters

Skip Stiles Executive Director, Wetlands Watch

From:	(b) (6)
Sent:	Saturday, July 30, 2022 11:03 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Comments RE: Belle Haven/New Alexandria Flood Wall
Attachments:	Flood WallLevee Opposition.pdf

June 15, 2022

Hello Metropolitan Washington Council of Governments & U.S. Army Corps of Engineers, (Please see attachment, which is a pdf version of the below),

As a longtime resident of Belle Haven, I am writing in strong opposition to the construction of a barrier Levee and Floodwall in the Belle Haven area. This assessment was recently reviewed and rejected, so I am disappointed and surprised to see it resurface so soon. I am also curious why such a significant project would keep returning to haunt our neighborhood, and causes concern over the true motivation for such a behemoth project. In support of this opposition, please consider the following concerns.

1) **Poses extreme traffic danger**. The Belle Haven area is already plagued with significant and increasing traffic flow. This is compounded by the Belle Haven Road and Belle View Boulevard entrances and exits onto the GW Memorial Parkway (GWMP). The traffic pattern is highly confusing and causes daily traffic struggles and accidents on a regular basis. The addition of a Floodwall/Levee in this area would distressingly and significantly worsen this problem.

2) **Poses extreme risk and impracticable access to residents looking to use the Mount Vernon walking/bike path**. Belle Haven/New Alexandria hosts a diverse socio-economic demographic that will be disproportionately impacted by the construction of a levee/floodwall. Many residents of all income levels use established, residential pathways to cross the GWMP at various points to go to the Belle Haven Park, the Marina, Dyke Marsh, and the Mount Vernon Path. The Floodwall/Levee would force foot and bike traffic into constricted points at Belle View Road and Belle Haven Boulevard, further exacerbating the traffic problem, significantly decreasing the ease of access across the parkway, and posing extreme danger to residents crossing in these constricted areas- which include children and elderly. The challenge in crossing the GWMP would result in many opting not to take advantage of the public parks across the street. A levee/floodwall would also pose an attractive nuisance for children to jump and play along the walled infrastructure.

3) **Questionable need and design:** The risk does not justify such a permanent and unsightly structure. If any place needs this, it would be Old Town, which is what is pictured/represented in the proposal. Business owners would not stand for this, and neither should residents. As a resident to this area for over 20 years, and living in Belle Haven for the last 8, the only flooding I have witnesses is in Old Town. In our neighborhood the rising water has occurred from Huntington Creek. Concerns about current flooding emanate from Hunting Creek. A wall may actually contain that water in the neighborhood, resulting in the exact opposite issue intended, thus magnifying water damage, not preventing it. Building a wall in anticipation of rising sea levels overcompensates for a potential threat, that is yet to come to fruition, and which Old Town currently encounters multiple times a year. In addition, houses are built to Flood Code and/or built to the requisite height from ground.

4) <u>Encircles an entire neighborhood</u>: The wonderful, open living conditions for which we purchased the property would be morphed into that of claustrophobic, partially walled community. The levee/floodwall would fundamentally and undesirably change the character and living conditions of the neighborhood.

5) **Defiles a National Park:** The placement of an unsightly barrier does not comport with the theme of keeping the GWMP a pristine and natural setting that is awe-inspiring. Instead the institution of a floodwall/levee would create a barrier-lined portion of the parkway, directly taking away from the beauty of the Washington DC area.

6) **Decreased propriety values**: Erecting a wall would result in a less desirable place to live for many, and directly result in the loss of property values associated with the appearance of such an unsightly structure, decreased access out of the neighborhood to the Mount Vernon Bike Path, and intensifying increasingly dangerous traffic patterns.

7) The exorbitant expense does not justify the potential benefit of protecting against a flood that is not yet to be seen. The cost of constructing the floodwall/levee would pale in comparison to the loss in property values. This funding could be used to help flooding in Old Town, or for another purpose such as repairing the Mount Vernon Trail.

Overall, the plan is not a rational response for the Belle Haven neighborhood to be protected from potential threat due to concerns over rising sea levels. Instead, it increases the threat to the safety of residents and drivers, decreases quality of life, and harms the economic well-being of the community.

This proposal needs to be firmly rejected.

Thank you for considering these points and voting down this effort,

(b) (6)



June 15, 2022

Hello Metropolitan Washington Council of Governments & U.S. Army Corps of Engineers,

As a longtime resident of Belle Haven, I am writing in strong opposition to the construction of a barrier Levee and Floodwall in the Belle Haven area. This assessment was recently reviewed and rejected, so I am disappointed and surprised to see it resurface so soon. I am also curious why such a significant project would keep returning to haunt our neighborhood, and causes concern over the true motivation for such a behemoth project. In support of this opposition, please consider the following concerns.

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3) **Questionable need and design:** The risk does not justify such a permanent and unsightly structure. If any place needs this, it would be Old Town, which is what is pictured/represented in the proposal. Business owners would not stand for this, and neither should residents. As a resident to this area for over 20 years, and living in Belle Haven for the last 8, the only flooding I have witnesses is in Old Town. In our neighborhood the rising water has occurred from Huntington Creek. Concerns about current flooding emanate from Hunting Creek. A wall may actually contain that water in the neighborhood, resulting in the exact opposite issue intended, thus magnifying water damage, not preventing it. Building a wall in anticipation of rising sea levels overcompensates for a potential threat, that is yet to come to fruition, and which Old Town currently encounters multiple times a year. In addition, houses are built to Flood Code and/or built to the requisite height from ground.

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5) **Defiles a National Park:** The placement of an unsightly barrier does not comport with the theme of keeping the GWMP a pristine and natural setting that is awe-inspiring. Instead the institution of a floodwall/levee would create a barrier-lined portion of the parkway, directly taking away from the beauty of the Washington DC area.

6) **Decreased propriety values**: Erecting a wall would result in a less desirable place to live for many, and directly result in the loss of property values associated with the appearance of such an unsightly structure, decreased access out of the neighborhood to the Mount Vernon Bike Path, and intensifying increasingly dangerous traffic patterns.

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Overall, the plan is not a rational response for the Belle Haven neighborhood to be protected from potential threat due to concerns over rising sea levels. Instead, it increases the threat to the safety of residents and drivers, decreases quality of life, and harms the economic well-being of the community.

This proposal needs to be firmly rejected.

Thank you for considering these points and voting down this effort,



From:	(b) (6)
Sent:	Saturday, July 30, 2022 7:30 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] DC Metro CSRM Study

Good evening,

I am a condo unit owner in the Belle View Condominium Association. I support the plan to build a flood wall in Belle View (location to be determined) given that it is a necessary measure to protect a well-established neighborhood and middle income housing in Fairfax county. I also second the comments mentioned in the in-person meeting in Belle View (which I attended) including that the wall should be in keeping with the colonial character of the parkway and neighborhood, and that it should consider both site lines to gain entry to the parkway and internal drainage concerns.

Thank you for holding the public meetings and I look forward to learning next steps.

#### (b) (6)

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Sent from Gmail Mobile

From:	(b) (6)
Sent:	Saturday, July 30, 2022 6:57 PM
То:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] DC Metro Coastal Study Comments
Attachments:	DC Metro Coastal Study_Comments_July 31 2022_Keough.pdf

Attached are my comments on the on Draft Integrated Feasibility Report and EA.

v/r

(b) (6)



#### DC Metro Coastal Study Coastal Storm Risk Management Feasibility Study and Environmental Assessment (May 2022)

As a member of the public, and resident of Fairfax County, I respectfully submit the following comments on this project.

- At the 14 June 2022 public meeting, the US Army Corps of Engineers (USACE) presenter stated that the National Park Service (NPS) Superintendent's position is for 'no unacceptable impacts to George Washington Memorial Parkway/ Park' (GWMP). I agree with that position. The Dyke Marsh area of GWMP was designated for conservation, and that designation must be respected. No construction should be planned within the Dyke Marsh area.
- 2. The public meeting and the study report stated an urgent, current need for flood control at the Belle Haven (actually, this area is known as Belle View, not Belle Haven) location. The report includes an unsettling figure of extensive flooding (up to Fort Hunt Road). This projected flood elevation was generated by modelling with various assumptions. I cannot critique the model, but the projected urgency seems exaggerated. In the 35 years I have lived in this area the only time Belle View flooded was during Hurricane Isabel. I therefore have a difficult time accepting that there is an urgent, current need for flood control at Belle View. There IS a need for better stormwater management in the area (as well as in all of southern Fairfax County), but this project does not address that need.
- 3. The Belle View condominium complex and the Belle View Shopping Center were constructed in the early 1950's, making them about 70 years old today. Property managers would likely say that at 70 years old those structures are close to the end of their useful life. USACE's costbenefit model (which I cannot critique) probably does not take this into account. The report says that the Belle Haven project is estimated to pay for itself in the year 2080 (when the Belle View condominium and shopping center buildings would be 130 years old). Wouldn't it be more realistic to acknowledge that the condominium and commercial buildings are likely to be replaced in the next decade or two? And, that that replacement construction would most likely include such alternatives as floodproofing, and raised buildings (not unlike construction in coastal beach communities), making them less vulnerable to flood damage? I feel that this would be a more accurate consideration of future structure conditions than what was used by the study.
- 4. If, upon reassessment, the study can document that flood control structures are truly needed now, then I agree with the flood control structures being located within the parcels that they are intended to protect (i.e., that they be located on the west side of the Parkway). That said, every effort must be made to minimize/mitigate the impact of the structures on the community. My understanding from the public meeting is that USACE is planning for a 6-foot high brick wall, topped with a barbed wire/chain link and cleared to a 15-foot width on both sides. Aesthetically, this is unacceptable within a residential area. No one should have to live with such an offensive structure to safeguard against a possible flooding event that might not happen for many years. Also, the structure must be designed to enable wildlife movement between

both sides of the Parkway (for both vehicular safety and the well being of the wildlife). The concept design as presented in the study needs to be redone

- 5. If the risk of flooding truly is what is being shown in the report, why aren't other areas of Fairfax County included in the flood control project? Shouldn't the Noman Cole Wastewater Treatment Plant be protected?
- 6. I am concerned over the 'public involvement' on this Study; I don't feel that that the public has been adequately included in the feasibility study. The development of this Feasibility Report, and selection of a preferred alternative, seemed to have happened without any notice to/involvement of local residents. All interested persons condominium residents, users of GMWP, local conservation organizations, etc. should have been informed and included earlier in the process. Even the 14 June 2022 public meeting posed an impediment to public involvement in that the meeting location was not properly signed. All main doors to the school were locked. No person or sign was in place to direct the public to the hard-to-find door on the rear of the building. There were no hand outs or materials with the project website to take away and share with persons who were unable to attend.

Respectfully, (b) (6)

From:	(b) (6)
Sent:	Friday, July 29, 2022 4:26 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Comments on Draft Integrated Feasibility Report & Environmental Assessment
Attachments:	Comments1.docx; GWMP History full version.doc

#### **Dear Sirs**

Please find my comments in the attachment along with a follow up on the history of the George Washington Memorial Parkway in the second.

#### Sincerely



Dear Sirs,

Thank you for the opportunity to comment on the Draft Integrated Feasibility Report & Environmental Assessment of May 2022.

The report is informative and technically comprehensive, but it does not adequately address how the significance of the George Washington Memorial Parkway (GWMP), or how it is negatively affected by the National Airport and Belle Haven flood walls (5c/alternative 8) and levies and the GWMP floodwalls (4a).

The GWMP is a Federal Park that is on the Virginia Landmarks Register and National Register of Historic Places because of its history, intent and purpose as can be seen in the two links bellow. It is no accident that the segment, which was completed in 1932 to commemorate the bicentennial of George Washington's birth, was credited with following the shore of the Potomac without consuming it, and it is considered one of the East's most attractively sited roadways and integral part of American heritage tying the past to future generations.

Historic Registration Designation https://www.dhr.virginia.gov/historic-registers/029-0228/

Nomination for Registration

https://www.dhr.virginia.gov/wp-content/uploads/2018/04/029-0228 George Washington Memorial Parkway 1990 Final Nomination.pdf

The National Historic Preservation Act of 1966 (NHPA) requires that the proposals undergo a Section 106 review because of the historic designation of the GWMP, especially as to how the vistas and view sheds are affected from the GWMP. This road is integral part of the American heritage, and future generations should have the opportunity to experience that same perspective.

Historic preservation considerations for the GWMP are as follows: (a) walls and levies affecting the viewshed of the GWMP should be built with compatible materials within the GWMP, which is stone; and (b) construction traffic on the GWMP is not permitted if an alternative exists, and should not be allowed because they do.

Most infringing and egregiously, some have proposed that the Belle Haven Floodwall/levee should be placed either on the GWMP itself or east of it. However, this violates the intent, purpose, and historical heritage of the park by causing irrevocable damage to the intended memorial character of the GWMP. These alternate Belle Haven proposals are therefore unacceptable, especially since a reasonable alternative exists as seen in proposal 5c/ alternative 8.

(See below and in the attachment for a more comprehensive description of the History of the GWMP)

#### The George Washington Memorial Parkway

(See also attachment)

The intent and purpose of the George Washington Memorial Parkway (GWMP) was made clear in 1887 by Edward Fox, who, building on the idea that "every patriotic American who visits Washington makes a pious pilgrimage to the home and tomb of the Father of his Country", suggested that "immediate steps should be taken to make a splendid drive from the Virginia terminus of the Aqueduct Bridge to Mount Vernon".

These ideals were further refined by the Macmillan Commission, which envisioned that: "these drives had certain definitions: Parkways or ways through or between parks; distinguished from highways or ordinary streets by the dominant purpose of recreation rather than movement; restricted to pleasure vehicles, and arranged with regard for scenery, topography and similar features rather than for directness".

The George Washington Memorial Parkway and its scenic vistas provide a contemplative and memorial sense for the Father of the United States as you drive to Mount Vernon, and, in the words of the enabling legislation "a striking and suitable tribute to the Father of our Nation, and one in which the people of America will take just pride and enjoyment".

The importance of the George Washington Memorial Parkway (GWMP) can only be properly understood in the context of its history and purpose, to which a lengthier paper can be found in the attachment The GWMP was envisioned as drive with certain definitions: Parkways or ways through or between parks; distinguished from highways or ordinary streets by the dominant purpose of recreation rather than movement; restricted to pleasure vehicles, and arranged with regard for scenery, topography and similar features rather than for directness.

No words can adequately express just how important the first president was in uniting a young nation. George Washington's residence at Mount Vernon and the city that bore his name could be dismissed as cultural icons, if it were not for his importance to the American heritage. The two became intertwined through not only George Washington, but also by the road connecting the two. This connection was so great, that in "Historic Buildings of America as Seen and Described by Famous Writers", Arthur Shadwell Martin relates how "every patriotic American who visits Washington makes a pious pilgrimage to the home and tomb of the Father of his Country. " But, haste was out of the question," the Family Magazine related in 1837, "for never was worse road extant than that to Mount Vernon." Departing from Alexandria, the road to Mount Vernon went inland, rather than along the river as it does today. There was scarcely a glimpse of the scenic

Potomac. Instead, one was required to traverse two large hills on an inland road in various state of disrepair that sometimes was more like a wooded trail.

Caroline Gilman described it in her book, "the Poetry of Travelling" as being "intolerably bad," and that "no one probably passes it without thinking before he arrives at Mount Vernon, that he has paid too dear for his whistle." The City of Alexandria fared no better than the road, having also fallen on hard times. Many authors described it as a dilapidated little town where "no one wishes to linger." Nevertheless, the importance of Mount Vernon was growing in the national conscience, even bringing forth calls for the government to take it over. While the family of George Washington had graciously accepted visitors for many years, they eventually could not manage the upkeep of the Mansion.

To save this landmark, the Mount Vernon Ladies Association was created in 1856 as the first historic preservation effort in America. It raised enough money to purchase the property two years later. Although, roads existed to Mount Vernon, they were neither the original one, nor ones that lent themselves to contemplative or pleasurable drives. Consequently, in 1887, in an article he wrote for the National Republican (a DC paper), Edward Fox came up with the idea to create a National Highway from Washington DC to Mount Vernon. Fox called for the "making of a splendid drive, a grand avenue and 100 feet wide that was properly graded and shaded between the capital city of the nation and the tomb of its great founder."

Building on the enthusiasm of the Fox article, in 1888, Mayor John B. Smoot of Alexandria founded the Mount Vernon Avenue Association in Alexandria to promulgate the creation of a national road to George Washington's home. The road would travel through Alexandria on the basis that many existing establishments were there when George Washington walked these streets. Since fortune had bypassed Alexandria, the buildings were still there. The Mount Vernon Avenue Association appealed to Congress the following year, which then really got started with trying to design this. They appropriated money for a Colonel Haines to come up with three routes (one of which came through Alexandria). No matter which route was selected along the Potomac, Haines intended it always to be in the process of development and embellishment. Envisioned as having a monumental character, the proposed "National Road", was a symbolic link between Mount Vernon Estate, the site so closely associated with George Washington, and the city that bore his name. Congress, unfortunately allocated no further money.

By 1898, the Centennial of the Nation's Capital was impending, so a group of citizens approached President McKinley about a plan for celebrating the event. This eventually resulted in the creation of the McMillan Senate Park Committee in 1901-1902, which was one of the most important committees in the nation's history, and which was named for Senator James McMillan of Michigan, Chairman of the Senate Committee on the District of Columbia. Park enthusiasts, historians, and planners in Washington, DC, often invoke the great and expansive vision of the McMillan Plan as the conceptual underpinnings of today's National Mall and Washington, D.C.'s Park System. Although the McMillan Commission did not directly deal with it, they very specifically addressed the need for and importance of having a road leading to the home of the father of our nation. The McMillan Senate Park Committee had clearly been influenced by landscape architect pioneers Olmstead, Vaux, Cleveland, and Eliot, who are credited with creating the term "Parkway." The McMillan Committee envisioned that "these drives had certain definitions: Parkways or ways through or between parks; distinguished from highways or ordinary streets by the dominant purpose of recreation rather than movement; restricted to pleasure vehicles, and arranged with regard for scenery, topography and similar features rather than for directness".

Although WWI had taken its toll, interest in history (particularly Colonial and early American history) remained strong. The Bicentennial of George Washington's birth was the impetus for a 1924 committee formed by Congress, and in 1932, the road was constructed. The road did travel through Alexandria on what is now known as "Washington Street." In doing so, the City of Alexandria entered into a 1929 agreement with the Federal Government promising to keep the memorial character of the Parkway. However, by 1946, Alexandria had fallen off the memorial wagon (so to speak), so the Federal Government indicated that the Parkway was to be moved away from Alexandria. At this point, the City of Alexandria offered to create a historic district to protect the Parkway, which would then remain in Alexandria. That is the genesis of Alexandria's historic district.

The George Washington Memorial Parkway thus shares this heritage with the world, as people from all nations and walks of life make a pilgrimage to Mount Vernon to pay their respects to the "Father of Our Country." The George Washington Memorial Parkway also represents a trust placed on the localities by the Federal Government to maintain the highway for the purpose and dignity it that was envisioned to convey, and that the Historic Designation created as a quid pro quo would continue to protect this singular heritage.

To conclude, the George Washington Memorial Parkway inculcates a heritage that warrants sharing with the world, as people from all over the globe make a pilgrimage from Washington D.C. to Mount Vernon to pay their respects to the Father of this Country. The Parkway also represents a trust placed on the Federal Government and localities that they would maintain the highway for the purpose and dignity it that was envisioned to convey. No person states this as well as did Caroline Oilman in 1838: "indeed, it is a curious step from Alexandria to Mount Vernon; the one teeming with the most worldly associations, and the other sacred to the highest feelings of our nature".\_

#### **Historic Registers**

DHR administers two programs designed to recognize Virginia's historic resources and to encourage their continued preservation: the Virginia Landmarks Register and the National Register of Historic Places.

The Virginia Landmarks Register (VLR):

- Was created in 1965 by the General Assembly in the Code of Virginia;
- Is the Commonwealth's official list of places of historic, architectural, archaeological and/or cultural significance;
- Is managed by staff of the Department of Historic Resources on behalf of the Virginia Board of Historic Resources;

The National Register of Historic Places

- Was established in 1966 by the National Historic Preservation Act;
- Is the official list of structures, sites, objects, and districts that embody the historical and cultural foundations of the United States;
- Includes places of local, state, and national significance;

 From:
 Rinehart, Nicholas (b) (6)

 Sent:
 Friday, July 29, 2022 3:48 PM

 To:
 DC-Metro-CSRM-Study

 Subject:
 [URL Verdict: Neutral][Non-DoD Source] FW: Flooding in the Belle View area and The National Park Service

#### Respectfully yours in public service,

Nick Rinehart Land Use & Development Liaison Supervisor Dan Storck Mount Vernon District Fairfax County Board of Supervisors 2511 Parkers Lane Mount Vernon, VA 22306 O: 703-780-7518



# Undergrounding Richmond Highway – the Time is NOW! <u>Click here</u> to learn how you can help make this happen!



For the latest updates on Coronavirus (COVID-19), visit the <u>County's webpage</u> and <u>subscribe</u> <u>to our newsletter</u>.



Please be advised, unless otherwise requested, that your email address will be added to our Mount Vernon District Advisor (newsletter) distribution list. Additionally, correspondence with Supervisors is subject to the Virginia Freedom of Information Act (FOIA). This means that your correspondence may be made public if someone requests it. Only a few matters are exempt from disclosure, including personnel information about individual employees.

From: Mt. Vernon District BOS < (D) (6) Sent: Friday, July 29, 2022 2:52 PM To: Rinehart, Nicholas (b) (6)

Subject: FW: Flooding in the Belle View area and The National Park Service

Respectfully yours in public service,

Nick Rinehart Land Use & Development Liaison Supervisor Dan Storck Mount Vernon District Fairfax County Board of Supervisors 2511 Parkers Lane Mount Vernon, VA 22306 O: 703-780-7518



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From: (b) (6)	
Sent: Friday, July 29, 2022 9:15 AM	
то: (b) (6)	
Cc: (b) (6)	
Cubicate Flooding in the Delle View area and The National Dark Comica	

Subject: Flooding in the Belle View area and The National Park Service

Dear Senator Warner,

My name is (b) (6) ; I am a get year resident at River Towers. I have a front row seat, from my window, to the marsh/creek that runs under the GW parkway and into the Potomac River.

The proposal to build a barrier across my backyard is one I do not support. I have already written to and spoken with Supervisor Storck and copied the Army Corps of Engineers on my email.

My message to you is this: now is the time for the National Park Service to participate in solving the flooding problems in our area. That land is managed by the Park Service but they don't own it. It is public land. They cannot continue to sit on the sidelines as residents try to figure this out when an obvious answer is to do something to protect the GW Parkway.

Every time it floods it causes problems. In a real flood emergency, it would bar any emergency vehicles from getting into Belleview from that direction.

We have lost dozens of older trees along the Parkway across from the golf course. Why has there **not** been a massive tree planting initiative to replace them? Trees (indigenous to this climate) are natural barriers to flooding. They help absorb groundwater that contributes to the rise in the water table. How simple an answer but nothing has been done.

It makes no sense at all.

I am a fan of conservation and I respect the historic value of the land around the parkway. But, a flood doesn't care about who owns what or the symbolic value of a piece of land.

Those are my thoughts on this.

Thank you for your attention to this matter.

Sincerely,



 From:
 (b) (6)

 Sent:
 Friday, July 29, 2022 3:48 PM

 To:
 DC-Metro-CSRM-Study

 Subject:
 [URL Verdict: Neutral][Non-DoD Source] FW: Flooding in the Belleview area and the National Park Service

Good afternoon, please see the email below

Respectfully yours in public service,

Nick Rinehart Land Use & Development Liaison Supervisor Dan Storck Mount Vernon District Fairfax County Board of Supervisors 2511 Parkers Lane Mount Vernon, VA 22306 O: 703-780-7518



# Undergrounding Richmond Highway – the Time is NOW! <u>Click here</u> to learn how you can help make this happen!



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From: (D) (6) Sent: Friday, July 29, 2022 2:52 PM Subject: FW: Flooding in the Belleview area and the National Park Service

Respectfully yours in public service,

Nick Rinehart Land Use & Development Liaison Supervisor Dan Storck Mount Vernon District Fairfax County Board of Supervisors 2511 Parkers Lane Mount Vernon, VA 22306 O: 703-780-7518



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From: (b) (6) Sent: Friday, July 29, 2022 9:15 AM To: (b) (6) Cc: (b) (6)

Subject: Flooding in the Belleview area and the National Park Service

Dear Senator Kaine,
The proposal to build a barrier across my backyard is one I do not support. I have already written to and spoken with Supervisor Storck and copied the Army Corps of Engineers on my email.

My message to you is this: now is the time for the National Park Service to participate in solving the flooding problems in our area. That land is managed by the Park Service but they don't own it. It is public land. They cannot continue to sit on the sidelines as residents try to figure this out when an obvious answer is to do something to protect the GW Parkway.

Every time it floods it causes problems. In a real flood emergency, it would bar any emergency vehicles from getting into Belleview from that direction.

We have lost dozens of older trees along the Parkway across from the golf course. Why has there **not** been a massive tree planting initiative to replace them? **Trees (indigenous to** this climate) are natural barriers to flooding. They help absorb groundwater that contributes to the rise in the water table. How simple an answer but nothing has been done.

It makes no sense at all.

I am a fan of conservation and I respect the historic value of the land around the parkway. But, a flood doesn't care about who owns what or the symbolic value of a piece of land.

Those are my thoughts on this.

Thank you for your attention to this matter.

Sincerely,



## Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Friday, July 29, 2022 3:08 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Opposition to the USACE proposal to mitigate Coastal Flooding - Belle Haven
Attachments:	2022 FLOOD WALL RESOLUTION.pdf
	·

Categories: Red Category

Attached is the Resolution passed unanimously by the Mount Vernon Council of Citizens Associations, and subsequently by the Belle View Condominium Board of Directors. Our position is stated succinctly, while the many details in your study that are faulty or ill-conceived are not delineated.

Belle View Condominium is strongly opposed to the proposed flood wall presented at your meeting on June 14. While we do support an acceptable plan to protect the Belle Haven area from coastal flooding, this plan is **not it.** As presented, it is the same plan rejected by local residents, as well as County and Congressional elected officials, during the meetings between you and the Flood Mitigation Task Force formed in 2012.

As stated by local property owners at the June 14 (and June 16 virtual) meeting, we need to be involved in the decisionmaking process, as well as offered alternate, reasonable proposals. Representative Don Beyer summed up the community reaction in his letter to you on July 18. Going forward it is necessary to consider solutions that involve Park Service property, to include a plan that will also protect the historical and national security importance of the George Washington Memorial Parkway.

Residents and elected officials alike are dismayed at the way this Coastal Study/proposed solution has been handled, and by the extreme adverse consequences to local businesses and property owners.

We do look forward to working with the USACE, the Park Service, and local officials to find an appropriate solution for mitigation of coastal flooding.



#### 2022 FLOOD WALL RESOLUTION

1. WHEREAS, the Army Corps of Engineers (COE) and the Washington Metropolitan Council of Governments (WMCOG) have proposed a Flood Wall on private property in New Alexandria, River View, Belle View Condominium, and River Towers Condominium; along with the commercial properties on Belle Haven Rd and

2. WHEREAS, the COE and WMCOG failed to notify the affected homeowners and business owners ahead of their report and failed to invite the commercial owners to the in-person meeting held on June 14; and

3. WHEREAS, the COG chose their flood wall plan without citizen input and, further, set the comment period deadline for June 30; and

4. WHEREAS, after the COE in-person meeting on June 14, 2022, with citizens/homeowners, county staff, Supervisor Storck plus representatives for our state elected officials, and Delegate Paul Krizek, the COE agreed to provide more details of their decision-making process and alternate plans they discarded, plus look into how they can extend the comment period deadline

THEREFORE, be it resolved, the MVCCA demands true community engagement and full disclosure by the COE, to include a new presentation of details and alternate plans for the residential areas and commercial areas; and

THEREFORE, be it resolved, the MVCCA demands a several-month extension for the comment period.

# Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Friday, July 29, 2022 1:12 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Comments of the Audubon Society of Northern Virginia on the Metro DC CSRM study
Attachments:	Comments of the Audubon Society of Northern Virginia on the Proposed Belle View Floodwall and Levee.pdf
Categories:	Red Category

Please find the comments of the Audubon Society of Northern Virginia.



11100 Wildlife Center Drive, Suite 100 Reston, VA 20190 (703) 438-6008 • info@audubonva.org audubonva.org

#### Comments on the U.S. Army Corps of Engineers' Proposed Belle View Floodwall and Levee, Draft Integrated Feasibility Report and Environmental Assessment

On behalf of the more than 5,000 members of the Audubon Society of Northern Virginia, I submit these comments to point out the deficiencies in the U.S. Army Corps of Engineers' (ACE) "tentatively selected plan" and study posted at <u>https://www.nab.usace.army.mil/DC Coastal Study/</u> and to share our objections.

The study proposes a floodwall, levee and pump stations in the Belle Haven-New Alexandria-River Towers area. It fails to fully consider all alternative coastal flooding management approaches, the ACE's rationale and the reasons for eliminating certain approaches.

Among other flaws this study -

- ignores the total river ecosystem of the middle Potomac River Basin;
- fails to include or provide for an "impairment assessment" by the National Park Service;
- under-recognizes the historic designation and character of the George Washington Memorial Parkway;
- ignores further restoration of Dyke Marsh;
- understates wetlands flood control potential;
- inadequately addresses environmental impacts; and
- inadequately evaluates possible threatened and endangered species.

#### **Rivers Do Not Behave in "Halves"**

It is puzzling that the draft report omits the District of Columbia and Maryland shorelines, which are as much an integral part of the middle Potomac River watershed ecosystem as the Virginia shoreline. The draft report states that Washington, D.C., and Prince George's County "declined to participate" since they "determined that their needs did not align with the proposed study," but fails to explain what those needs are.

Storms and floods would affect both sides of the river. The entire river in this area is tidal, not half the river. Coastal flooding and opportunities to address coastal flooding management affect the Virginia, Washington, D.C., and Maryland shorelines, all three. The study authority cited on page 1 specifically includes those jurisdictions.

*Recommendation*: Include all jurisdictions in the middle Potomac River watershed in the analysis and recommendations.

#### Some Relevant Laws Are Missing

While the study on page 180 lists "environmental laws . . . required for the project alternatives under consideration," it omits the 1916 National Park Service Organic Act, the law directing construction of the GW Memorial Parkway and P.L. 86-41 which added the Dyke Marsh Wildlife Preserve to the national park system.

The 1916 Organic Act that authorized the National Park Service, enacted at 39 Statutes at Large 535, ch. 408, §1 (Aug. 25, 1916) and now codified at 54 U.S.C. § 100101(a), declares that the National Park System's purpose is to conserve federal parklands scenery, natural and historic objects, and wildlife, and provide for its enjoyment in such manner and by such means "as will leave them unimpaired for the enjoyment of future generations."

Any analysis of an approach affecting national park lands must include the National Park Service's own assessment whether the recommended alternative would constitute an unacceptable "impairment" to park resources and values.

The National Park Service's Management Policies (2006) explain that "[t]he impairment of park resources and values may not be allowed by the Service unless directly and specifically provided for by legislation or by the proclamation establishing the park"; and "[b]efore approving a proposed action that could lead to an impairment of park resources and values, an NPS decision-maker must consider the impacts of the proposed action and determine, in writing, that the activity will not lead to an impairment of park resources."

The phrase "park resources and values" subject to the no-impairment standard is very inclusive. It includes "the park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals…" National Park Service's <u>Management Policies</u> (2006) §§ 1.4.4 - 1.4.7.

Page 101 of the draft report states that "[d]uring agency coordination meetings, NPS has voiced that they are very concerned with any impact to the parkway, which includes anything that detracts from the character or viewshed of the road and its historic integrity. This includes changes to views of the river, disconnection from the natural landscape, alterations of other views, impact to the historical character of the road itself, impacts from induced flooding to trails or other NPS resources, and other cultural resource impacts. NPS has been negotiating with the Federal Highway Administration (FHWA) over a 7-inch raising of the wall along the parkway, and therefore there is little viability for a floodwall that would be significantly higher than what is currently under negotiation."

**Recommendation:** Include the 1916 National Park Service Organic Act as one of the applicable environmental laws and do not choose, fund or otherwise proceed with a final approach without this official, legally-required "impairment" analysis from the National Park Service. Include the other two laws cited above.

More fully evaluate the floodwall/levee's negative impacts on federal park resources and values, including the Dyke Marsh Wildlife Preserve, visitors and the local community and the survivability of Dyke Marsh.

### Habitat and Environmental Impacts Analyses Are Inadequate

The draft study understates or ignores adverse environmental impacts. Starting on page 3, the study states "reasonably foreseeable effects to the human environment are not expected to be significant and that "adverse environmental effects (undefined) will be offset by mitigation (undefined)."

The study lacks an explanation or scientific justification for many of its conclusions.

Among many potential environmental impacts that warrant further analysis are these:

- "Construction of the proposed culvert crossings would result in roughly 2,250 sq ft of new permanent fill impacts to two streams." (page 175). More fill will reduce an already diminished floodplain, a natural flood control system, and therefore could create more flooding.
- Hardened approaches like floodwalls and levees can increase erosive forces on adjacent properties.
- If the floodwall/levee system requires 40 feet on both sides, many trees and other vegetation will presumably be destroyed, in an area already suffering from serious tree loss.
- The study has no time-of-year restrictions for construction of the levee, which can affect nesting waterfowl and other wildlife in west Dyke Marsh.

#### The Study Relies on Questionable Data

The study identifies some federal and state-listed species "that have the potential to be present in the study area." The study on page 13 states, "Each species was further assessed to determine if suitable habitat conditions are present."

Whether "suitable habitat conditions are present" for species that "have the potential to be present" is not a definitive assessment of what is in fact documented to be present. For example, the ACE study cites the peregrine falcon and the monarch butterfly, a federal candidate species, as having the "potential" to be present. They have, in fact, been documented as present in recent years.

The study on page 129 cites bald eagle nests nearby confirmed in 2018. Three bald eagle nests have been active and successful in the Dyke Marsh Wildlife Preserve in recent years, including three active nests in 2022. The study data is four years out of date.

The study refers to a 40-year-long bird list of 296 species in Dyke Marsh compiled by the Friends of Dyke Marsh, 2021. The Friends of Dyke Marsh and others have prepared several bird lists over the years, including studies of breeding birds and others.

The Friends of Dyke Marsh, the Audubon Society of Northern Virginia, George Mason University, the Virginia Herpetology Society, the National Park Service and others have other survey data for flora and fauna. That should be utilized in analyzing the impact of the proposed construction.

Table 2-1 on page 14 lists only three species of bats "that have the potential to be present in the study area." However, observers have documented the ten species of bats in Dyke Marsh, including west Dyke Marsh near the site for a proposed levee, including the three listed on table 2-1:

- Big brown bat, *Eptesicus fuscus* (very common)
- Silver-haired bat, *Lasionycteris noctivagans* (common during spring and autumn)
- Eastern red bat, *Eptesicus fuscus* (very common)
- Hoary bat *Lasiurus cinereus* (common during spring and autumn)
- Northern long-eared bat, *Myotis septentrionalis* (occasional)
- Evening bat, *Nycticeius humeralis* (common)

- Brazilian free-tailed bat *Tadarida brasiliensis* (new migrant to Virginia, common)
- Seminole bat, *Lasiurus seminolus* (occasional)
- Little brown bat, *Myotis lucifugus* (rare)
- Tri-colored bat, *Perimyotis subflavus (*rare)

**Recommendation**: Use existing survey data that confirms actual species present, as opposed to those potentially present and conduct comprehensive surveys to determine others that are in fact present. Document how the destruction of trees and other vegetation would impact wildlife.

Thank you for your consideration of these comments. Please contact me if you have any questions.

Respectfully Submitted,



Tom Blackburn Advocacy Chair Audubon Society of Northern Virginia

From:	(b) (6)
Sent:	Friday, July 29, 2022 12:27 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Metropolitan Washington District of Columbia Coastal Storm Risk Management
-	Feasibility Study

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

It will cause flooding of our buildings since the walls will retain rainwater that previously could've drained in the marsh.

It does not address stormwater flooding, which has already proven to be a significant problem in our area

It does not address the aesthetic and pragmatic needs of the community and the loss of amenities

The current plan includes destruction of property and will negatively impact the property values of the affected neighborhoods

The current plan would destroy many of our natural resources, including trees and wetlands, which naturally mitigate flooding and global warming, and which should be enhanced, not destroyed

The plan negatively affects Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County

The plan does not address how wildlife will traverse the flood wall and levee

The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.

#### Sincerely, (b) (6)

From:	(b) (6)	
Sent:	Thursday, July 28, 2022 2:40 PM	
To:	(b) (6)	
	Metro-CSRM-Study	
Subject:	[Non-DoD Source] NOVA Coast Study	

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

- It does not address stormwater flooding, which has already proven to be a significant problem in our area
- It does not address the aesthetic and pragmatic needs of the community and the loss of amenities
- The current plan includes destruction of property and will negatively impact the property values of the affected neighborhoods
- The current plan would destroy many of our natural resources, including trees and wetlands, which naturally mitigate flooding and global warming, and which should be enhanced, not destroyed
- The plan negatively affects Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County
- The plan does not address how wildlife will traverse the flood wall and levee
- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.

Sincerely,



# Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Thursday, July 28, 2022 1:22 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Flood Mitigation Plan related letter
Attachments:	Coastal Wall Letter .docx

Dear Professionals,

Please see attached letter here regarding the Flood Mitigation Plan.





July 28, 2022

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

- It does not address stormwater flooding, which has already proven to be a significant problem in our area
- It does not address the aesthetic and pragmatic needs of the community and the loss of amenities
- The current plan includes destruction of property and will negatively impact the property values of the affected neighborhoods
- The current plan would destroy many of our natural resources, including trees and wetlands, which naturally mitigate flooding and global warming, and which should be enhanced, not destroyed
- The plan negatively affects Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County

- The plan does not address how wildlife will traverse the flood wall and levee
- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for your time and consideration.



 From:
 (b) (6)

 Sent:
 Wednesday, July 27, 2022 3:59 PM

 To:
 DC-Metro-CSRM-Study

 Subject:
 [URL Verdict: Neutral][Non-DoD Source] DC Metro CSRM Study -- Comments from the Friends of Dyke Marsh

#### Comments of the Friends of Dyke Marsh on the U.S. Army Corps of Engineers' Proposed Belle View Floodwall and Levee, Draft Integrated Feasibility Report and Environmental Assessment (May 2022)

(b) (6)

July 27, 2022

On behalf of the Friends of Dyke Marsh, we submit these comments to object to the study of the proposed floodwall, levee and pump stations in the Belle Haven-New Alexandria-River Towers area, the U.S. Army Corps of Engineers' (ACE) "tentatively selected plan" posted at <u>https://www.nab.usace.army.mil/DC Coastal Study/</u>. The study does not fully consider all alternative coastal flooding management approaches or explain the ACE's rationale and the reasons for eliminating certain approaches. Without this information, the study is flawed and the public is unable to evaluate their comparative merits.

Among other deficiencies, this study -

- ignores the total river ecosystem of the middle Potomac River;
- fails to allow for an "impairment assessment" by the National Park Service;
- minimizes the historic designation and character of the George Washington Memorial Parkway;
- ignores further restoration of Dyke Marsh;
- understates wetlands flood control potential;
- fails to adequately address environmental impacts; and
- inadequately evaluates possible threatened and endangered species.

#### The ACE Proposed Floodwall, Levee and Pump Stations in the Belle Haven Area

The draft study proposes a Belle Haven floodwall in Appendix G described as a "levee/floodwall system" of "6,725 total linear feet consisting of 1,900 linear feet of I-Wall, 3,715 linear feet of T-

Wall, 400 linear feet of earthen levee, and include five aluminum stop-log closures and two culvert crossings. Pump stations will be located in uplands at the location of the two culvert crossings."

The project's location is described as follows on page 168: "At Belle Haven, a floodwall would be constructed just north of Belle Haven Road from Barrister Place to 10<sup>th</sup> Street with a closure structure at 10<sup>th</sup> Street and the GWMP. Closure structures would also be constructed along Belle Haven Road and Belle View Blvd. A floodwall would tie into the closure structure at 10<sup>th</sup> Street and run south along the west side of the GWMP, curving around Boulevard View to 10<sup>th</sup> Street. The floodwall would then run west to East Wakefield Drive tying into both sides of a closure structure on Potomac Avenue. The floodwall would continue west to West Wakefield Drive and tie into a small portion of earthen levee ending at Westgrove Dog Park."

Page 140 indicates that it "may permanently obstruct the view of the natural areas located south of Belle Haven and the GWMP [for] the residents of the Belle Haven community."

#### Study Ignores the Total River Ecosystem

The draft report does not include the District of Columbia and Maryland shorelines, potential flooding there or approaches to address it. Those shorelines are as much a part of the middle Potomac River watershed ecosystem as the Virginia shoreline. Prince George's County is directly across from Belle Haven/Belle View/Dyke Marsh. Page i of the draft report states that Washington, D.C., and Prince George's County "declined to participate" since they "determined that their needs did not align with the proposed study."

It is critical to understand what "their needs" are and how those needs differ from Virginia's since the same river flows next to all three jurisdictions and affects all three jurisdictions. Storms, floods and other river events affect both sides of the river. Additionally, it is critical to understand those jurisdictions' adopted or considered coastal flooding management approaches, in evaluating management approaches for the Virginia side of the river.

When a river rises, the entire river rises, not just half the river. The entire river has tides, not half the river. Building structures on only one side of a tidal river ignores the entire river and its potential behavior. This is a piecemeal approach that ignores the full coastal flooding potential and opportunities for various approaches, including nonstructural, coastal flooding management approaches on the Washington, D.C., and Maryland shorelines. Ignoring the entire river also fails to identify opportunities for wetland restoration, creation and migration as alternatives.

The May 23, 2001, Senate resolution cited on page 1 as the study authority specifically includes "conducting a study, in cooperation with the States of Maryland and West Virginia, the Commonwealths of Pennsylvania and Virginia, and the District of Columbia, their political subdivisions and agencies and instrumentalities thereof . . ."

**Recommendation**: Include all jurisdictions in the middle Potomac River watershed in the analysis and recommendations and the coastal flooding management measures that all affected jurisdictions have considered or implemented.

# The Study Lacks an Assessment of Impairment of National Park Resources and Values Required by Law

The 1916 Organic Act that created the National Park Service, enacted at 39 Statutes at Large 535, ch. 408, §1 (Aug. 25, 1916) and now codified at 54 U.S.C. § 100101(a), declares that the National Park System's purpose is to conserve Federal parklands scenery, natural and historic objects, and wildlife and provide for its enjoyment in such manner and by such means "as will leave them unimpaired for the enjoyment of future generations."

Assuming a coastal flooding alternative would impact the George Washington Memorial Parkway, the National Park Service must first have the opportunity to make its own assessment and determine whether the recommended approach would constitute an unacceptable "impairment" to park resources and values

Consistent with Congress's no-impairment mandate, the National Park Service's Management Policies (2006) explain that "[t]he impairment of park resources and values may not be allowed by the Service unless directly and specifically provided for by legislation or by the proclamation establishing the park"; and "[b]efore approving a proposed action that could lead to an impairment of park resources and values, an NPS decision-maker must consider the impacts of the proposed action and determine, in writing, that the activity will not lead to an impairment of park resources and values." The phrase "park resources and values" subject to the no-impairment standard include "the park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals…." National Park Service's <u>Management Policies</u> (2006) §§ 1.4.4 - 1.4.7.

The study on page 180 lists "environmental laws . . . required for the project alternatives under consideration." It omits at least three relevant laws: the 1916 National Park Service Organic Act, the law directing construction of the GW Memorial Parkway and P.L. 86-41 which added the Dyke Marsh Wildlife Preserve to the national park system.

The draft report and the Corps comments at the June 14, 2022, public meeting acknowledge that the National Park Service has concerns about a proposed floodwall.

Page 101 of the draft report noted that "[d]uring agency coordination meetings, NPS has voiced

that they are very concerned with any impact to the parkway, which includes anything that detracts from the character or viewshed of the road and its historic integrity. This includes changes to views of the river, disconnection from the natural landscape, alterations of other views, impact to the historical character of the road itself, impacts from induced flooding to trails or other NPS resources, and other cultural resource impacts. NPS has been negotiating with the Federal Highway Administration (FHWA) over a 7-inch raising of the wall along the parkway, and therefore there is little viability for a floodwall that would be significantly higher than what is currently under negotiation."

**Recommendation:** Include the 1916 National Park Service Organic Act and other laws cited above as applicable environmental laws and do not choose, fund or otherwise proceed with a final approach without this official, legally-required "impairment" analysis from the National Park Service.

More fully evaluate the floodwall/levee's negative impacts on federal park resources and values, including the Dyke Marsh Wildlife Preserve, visitors and the local community and the survivability of Dyke Marsh.

#### The Study Minimizes the Historic Designation of the George Washington Memorial Parkway

The George Washington Memorial Parkway is listed on the Virginia Department of Historic Resources register, 029-0228 <u>https://www.dhr.virginia.gov/historic-registers/029-0228/</u> because of its "important contributions to landscape design" and because "extended verdant parks offer constantly unfolding scenic views."

It is listed as 95000605 on the National Register of Historic Places at <u>https://catalog.archives.gov/id/117691603</u>. Both nomination forms explain that Congress's intent was "a public project memorializing George Washington."

The Virginia nomination document states "The landscape values for the George Washington Memorial Parkway have always been the preservation of scenic and esthetic qualities associated with the Potomac River valley . . . the palisades and the tree covered slopes, flowering understory, steep-sided creek valleys (runs) and hilltop vistas."

A floodwall/levee system would likely be inconsistent with these values and compromise the historic, natural and aesthetic integrity of the parkway.

Starting on page 29, the study explains that certain consultations are required for "federal actions that may affect historic properties." Table 2-8 includes the George Washington Memorial Parkway as an "archaeological and architectural/Above-ground "resources with 0.5 miles of Alternative 5c (Belle Haven and other alternatives. Presumably, all alternatives affecting the parkway's resources and values, as defined in NPS management policies, would require a review by the federal Advisory Council on Historic Preservation.

Presumably, depending on the sponsor (the study cites Fairfax and Arlington Counties), local and state actions could also affect historic properties, such as the George Washington Memorial Parkway.

Dyke Marsh potentially has archaeological resources.

**Recommendation:** Thoroughly evaluate other alternatives and their environmental impacts and impacts on historic properties. Assuming a coastal flooding management alternative would impact the George Washington Memorial Parkway, as impacts are described in the Park Service's management policies above, explain how a floodwall/levee system would be consistent with the parkway's state and federal historic designations and Congress's intent in directing the building of the parkway.

#### Some Alternatives Could Compromise the Parkway's Historic Character

Floodwalls, levees and similar structures as described in the study are contrary to the parkway's character and Congress's intent.

The George Washington Memorial Parkway, a Unique Gateway to Mount Vernon: In 1928, Congress authorized the construction of the Mount Vernon Memorial Parkway to honor the bicentennial of George Washington's birth. Lt. Col. Peter Hains, who conducted the first land survey told Congress that the parkway should "have the character of a monumental structure, such as would comport with the dignity of this great nation . . . and the grandeur of character of the man to whom it is dedicated. . . It should be such a work as no American need feel ashamed of."

The U.S. Department of Agriculture completed the first segment, the southern part, in 1932. Planners envisioned a unique roadway to preserve and enhance the Potomac River valley, keep both shorelines in public ownership and create a grand gateway to Mount Vernon Estate, the first president's plantation.

They sought to integrate the road with the undulating terrain following natural contours and winding in gentle curves and to highlight natural areas and scenic vistas of the river. They included forested and grassy areas, minimized signs and lights and prohibited billboards. Builders used then-modern highway design approaches like overpasses, limited access, widely-spaced exits and entrances, tree-lined rights-of-way and bridges made of reinforced concrete faced with hand-laid, rough-cut stone for a natural look.

Assuming a coastal flooding management alternative would impact the George Washington Memorial Parkway, as impacts are described in the Park Service's management policies above, a floodwall/levee system would be contrary to Congress's intent and the planners' goals and design.

*Wildlife Habitat Paramount*: The 1959 law (P.L. 86-41) that added Dyke Marsh to the National Park Service system clearly states Congress's intent in preserving Dyke Marsh as a wildlife preserve: "... so that fish and wildlife development and their preservation as wetland wildlife habitat shall be paramount."

Nature does not respect artificial, manmade boundaries. Wildlife, pollinators and water, for example, move throughout the environment. A floodwall/levee system in, near or next to a wildlife preserve and wetland could have adverse impacts inconsistent with Congress's intent.

**Recommendation**: Eliminate alternatives inconsistent with the parkway's character. Assuming a coastal flooding management alternative would impact the George Washington Memorial Parkway, as impacts are described in the Park Service's management policies above, fully examine alternative approaches and their impacts.

#### The Study Ignores Further Dyke Marsh Restoration

The study cites on page 1 as the authority for the study a May 23, 2001, U.S. Senate Committee on the Environment and Public Works resolution and acknowledges that the Senate resolution includes ecosystem restoration, but "this study will focus solely on CSRM" (coastal storm risk management). The study does not explain why the Corps ignores the resolution's language addressing "ecosystem restoration."

Wetlands act as "nature's sponges" to control floodwaters. See <u>The Study Understates</u> <u>Wetlands' Flood Control Potential</u> below.

The study on pages 102-3 acknowledges the potential for further Dyke Marsh restoration. The study states, "Further information is required to understand how much marsh restoration would mitigate storm impact and restoration was not retained as a measure." Therefore, the Corps has excluded wetland restoration as an approach.

Dyke Marsh was once far larger before dredge mining occurred between 1940 to 1972. Dyke Marsh has only been partially restored under the 2016 George Washington Memorial Parkway's Record of Determination. This Record of Determination provided that the marsh would be restored in a "phased approach up to the historic boundary of the marsh," where "[i]mplementation of the different phases will be dependent upon available funding and fill material," where "[f]uture phases will continue marsh restoration until a sustainable marsh is achieved," where "[t]the outer edges of the containment cell structures will be placed at the park boundary in the river," with "[r]estoration of 16 acres of wetlands south of the breakwater will also be included as an option," and with "[a]pproximately 180 acres of various wetland could be created overall...." 2016 Record of Determination, pages 3-4, found

at <a href="https://parkplanning.nps.gov/document.cfm?parkID=186&projectID=20293&documentID=738">https://parkplanning.nps.gov/document.cfm?parkID=186&projectID=20293&documentID=738</a>

One reason the study apparently dismisses further Dyke Marsh restoration is because of the "state's reluctance." The "state's reluctance" apparently refers to one permit considered and granted by the Virginia Marine Resources Commission. What the report calls the "state's reluctance" is unexplained. Other permits could presumably be approved. State leadership and decision-makers change. Conditions change. Designs can change.

Virginia has committed to wetlands restoration in the interstate Chesapeake Bay agreement and in its tidal wetlands law.

**Recommendation:** Analyze the survivability of Dyke Marsh under various alternatives and analyze the potential of further Dyke Marsh and other area wetlands restoration and restoration's impacts. Analyze alternatives' adverse environmental impacts and propose mitigation on-site and in-kind if an alternative would have adverse impacts.

#### The Study Inadequately Analyzes Many Other Alternative Approaches

Table 3-2 lists "management measures screened with study objectives."

One measure is "improve resiliency of critical infrastructure," but the study fails to include or analyze how some alternative approaches can improve natural resiliency.

Importantly, the study does not include a full evaluation of the 20 risk management measures for coastal communities subject to flooding that are in the ACE North Atlantic Coast Comprehensive Study Report (<u>https://www.nad.usace.army.mil/CompStudy/</u>). It is unclear why the Corps did not start with evaluating more alternatives. The Corps' screening process is unclear and the study fails to adequately explain why these alternatives were eliminated.

The study fails to fully analyze for the public many alternatives to a floodwall and levee system that can address potential flooding, including the following:

• flood management measures on the District of Columbia and Prince Georges County shorelines;

- retrofitting or flood proofing non-elevated buildings;
- buyouts of at-risk properties;
- the creation of additional storm water drainage;
- upgrades of stormwater controls;
- reduction of impervious surfaces;
- building of living shorelines; and
- wetlands creation and restoration.

Consistent with the ACE North Atlantic Coast Comprehensive Study Report (<u>https://www.nad.usace.army.mil/CompStudy/</u>), the Corps of Engineers should at a minimum evaluate the following risk management measures as alternatives to a floodwall/levee system:

#### A. ALTERNATIVE: RETROFIT FOR NON-ELEVATED BUILDINGS.

For a non-elevated structure in the flood zone that is prone to flooding, Study Report #2 recommends building retrofit to address flooding, which "include elevation of a structure or possibly dry flood proofing of a structure. Elevation of a structure is usually limited to smaller residential and commercial buildings. Whether a structure may be elevated depends on a number of factors, including the foundation type, wall type, size of structure, condition, etc."

There are two types of flood proofing for buildings according to the Corps of Engineers' Local Flood Proofing Programs (February 2005) found at <u>https://www.usace.army.mil/Missions/Civil-Works/Project-Planning/nnc/</u>. Dry flood proofing involves "[m]aking the building walls and floor watertight so water does not enter, while wet flood proofing involves "[m]odifying the structure and relocating the contents so that when floodwaters enter the building there is little or no damage."

Dry Flood Proofing deals with "[s]ealing a building to ensure that floodwaters cannot get inside.... All areas below the flood protection level are made watertight. Walls are coated with a waterproofing compound, or plastic sheeting is placed around the walls and covered. Openings, such as doors, windows, sewer lines and vents, are closed temporarily, with sandbags or removable closures, or permanently." Local Flood Proofing Programs (February 2005) page 6.

Wet Proof Flooding addresses "[h]ydrostatic water pressure [which] increases with the depth of water. Depths over 3 feet have been shown to collapse the walls of a typical house. Basements can be subject to 6 or 7 feet of water pressure when the ground is saturated. As a result, watertight walls and floors may crack, buckle or break from shallow surface flooding. One way to deal with this is simply to let the water in and remove or protect everything that could be damaged. ... Wet flood proofing measures range from moving a few valuable items to rebuilding the flood prone area." Local Flood Proofing Programs (February 2005) page 7.

The Corps of Engineers has stated that "flood proofing has also been shown to be less expensive than other flood protection measures." "Flood protection studies in Fairfax County, Virginia, and King County, Washington, reviewed a variety of structural and nonstructural alternatives. Where flood proofing was found to be the most economical solution, the community favored it instead of a more expensive structural project. Fairfax County noted that flood proofing is cheaper than 'chasing the system a mile downstream to fix the overland route.'" Local Flood Proofing Programs (February 2005) page 9.

#### B. ALTERNATIVE: DRAINAGE IMPROVEMENTS.

Study Report #15 recommends drainage improvements as an option to address flooding. "A drainage system can carry water away via conveyance systems and, during times of high water, may store water until it can be carried away in storage facilities. Conveyance systems utilize measures such as pump stations, culverts, drains, and inlets to remove water from a site quickly and send it to larger streams. Storage facilities are used to store excess water until the storm or flood event has ended."

#### C. ALTERNATIVE: CREATION OF LIVING SHORELINES

Study Report #16 recommends the creation of living shorelines as an option to address flooding. "Open and exposed shorelines are prone to erosion due to waves. Living shorelines are essentially tidal wetlands constructed along a shoreline to reduce coastal erosion. Living shorelines maintain dynamic shoreline processes, and provide habitat for organisms such as fish, crabs and turtles. An essential component of a living shoreline is constructing a rock structure (breakwater/sill) offshore and parallel to the shoreline to serve as protection from wave energy that would impact the wetland area and cause erosion and damage or removal of the tidal plants."

#### D. ALTERNATIVE: CREATION OR ADDITION OF WETLANDS

Study Report #20 recommends the creation or addition of wetlands as an option to address flooding. "The dense vegetation and shallow waters within wetlands can slow the advance of storm surge somewhat and slightly reduce the surge landward of the wetland or slow its arrival time. Wetlands can also dissipate wave energy; potentially reducing the amount of destructive wave energy propagating on top of the surge, though evidence suggests that slow-moving storms and those with long periods of high winds that produce marsh flooding can reduce this benefit."

**Recommendations:** More fully evaluate other alternatives and using a combination of alternatives; explain to the public the selection of an initial limited list of alternatives and the Corps' screening process and explain, in terms of their effectiveness, why alternatives were eliminated.

#### The Study Fails to Adequately Address Environmental Impacts

The draft study offers minimal analysis of environmental impacts and in fact (page 3) says "reasonably foreseeable effects to the human environment are not expected to be significant and that "adverse environmental effects (undefined) will be offset by mitigation (undefined)." The report includes a "finding of no significant environmental impact" to justify an environmental assessment instead of a full-blown environmental impact statement.

The study states on page 174 that -

• the floodwall/levee system "may result in temporary and minor effects to natural and physical environmental resources during construction . . . Long-term effects include permanent fill impacts to the Belle Haven East Channel and obstruction of the view."

• A potential change in inundation depth in the wetlands following construction of the floodwall/levee is not expected to affect the health, character or integrity of the wetlands."

The study lacks an explanation or scientific justification for these conclusions.

Hardened approaches can increase erosive forces on adjacent properties. The study fails to analyze the impact of a floodwall/levee system on adjacent properties.

On page 175, the study states that "Construction of the proposed culvert crossings would result in roughly 2,250 sq ft of new permanent fill impacts to two streams." Presumably more fill will reduce the floodplain, a natural flood control system, and therefore could create more flooding.

40 CFR 1502.14(a)(b) requires that "[t]he alternatives section should present the environmental impacts of the proposed action and the alternatives in comparative form based on the information and analysis presented in the sections on the affected environment and the environmental consequences. In this section, agencies shall: (a) Evaluate reasonable alternatives to the proposed action, and, for alternatives that the agency eliminated from detailed study, briefly discuss the reasons for their elimination. (b) Discuss each alternative considered in detail, including the proposed action, so that reviewers may evaluate their comparative merits. . . . ."

If the floodwall/levee system requires a space of 40 feet on both sides, trees and habitat on federal and private property will presumably be destroyed or degraded. The study fails to document which trees or how many trees and related vegetation would be destroyed or the impact.

The study includes no time-of-year restrictions for construction, such as fish spawning and waterfowl nesting in west Dyke Marsh.

**Recommendation:** Thoroughly evaluate all environmental impacts of all approaches, including the floodwall/levee system, no action and others.

#### The Study Understates Wetlands' Flood Control Potential

Wetlands play a key role in flood protection, which the study minimally recognizes on page 11. "Nowhere is this function more important than along coastal areas . . . Preserving and reconstruction coastal marshes can help reduce storm damage. Coastal wetlands serve as storm surge protectors when hurricanes or tropical storms come ashore." (*Wetlands: Protecting Life and Property from Flooding*, U.S. Environmental Protection Agency (EPA))

Other EPA findings:

• "A one-acre wetland can typically store about three-acre feet of water, or one million gallons. An acre-foot is one acre of land, about three-quarters the size of a football field, covered one foot deep in water." (*Wetlands: Protecting Life and Property from Flooding*)

• "Wetland restoration and preservation is an important component of a comprehensive flood protection strategy." (*Wetlands: Protecting Life and Property from Flooding*)

• "The ability of wetlands to store floodwaters reduces the risk of costly property damage and loss of life – benefits that have economic value to us. For example, the U.S. Army Corps of Engineers found that protecting wetlands along the Charles River in Boston, Massachusetts, saved \$17 million in potential flood damage." (*Functions and Values of Wetlands*)

The study on page 10 acknowledges that "wetlands historically lined the Potomac River, the Old Town Alexandria waterfront, Hunting Creek and Cameron Run. . . most of these wetlands are gone. . . ." The study fails to evaluate the creation and restoration of wetlands.

**Recommendation:** Evaluate the creation and restoration of wetlands, including their flood control potential.

#### The Study Inadequately Examines Wetlands Migration

The study fails to identify areas for potential tidal wetlands migration anticipated because of sea level rise.

Many of the jurisdictions along both sides of the Potomac River have areas which could accommodate the creation or addition of wetlands and areas to which existing wetlands can migrate landward.

**Recommendation**: Identify and evaluate potential areas for wetlands to migrate inland.

#### The Study Inadequately Examines Wetlands' Value, Intertidal Activity and Habitat

Tidal shorelines are dynamic, transitional areas between land and water. Shoreline structures can sever the connection between land and water, block natural tidal exchange and impact shallow water habitats essential to fish, birds and other wildlife. "Freshwater marshes are one of the most productive ecosystems on earth." (U.S. Environmental Protection Agency)

The Corps proposes to build concrete structures, culverts and pump houses on both the creeks that feed into Dyke Marsh, just upstream from the marsh.

On page 122, "Flap gates would be installed at the ends of the culverts at the proposed culvert crossings. Flap gates are mounted by hinges at the top of the culvert pipe and open and close in response to water pressure. Flap gates allow the free flow of water through the culvert pipe during normal water flows. During a high-water event, when the depth of water is greater on the riverside of the floodwall, the flap will close automatically to prevent back flow."

The study fails to acknowledge that these two creeks are tidal. If the flap gates are down, except during discharge events, the effect, as described in the study, will be to stop the tidal flow and intertidal exchange of these creeks. The east creek has tides of over one foot, even north of Olde Towne Road, approximately 50 yards from Belle Haven Road.

The study on page 121 concludes that "the structural measures proposed at Belle Haven would have no direct effects to wetlands," without substantiation. It is widely agreed that structures in tidal wetlands block intertidal exchange.

Amphibious wildlife, for example, use both water and land. Turtles leave the marsh and dig nests and lay eggs on properties adjacent to Dyke Marsh, for example.

**Recommendations:** Recognize and describe the value of the various habitats that would be affected and evaluate the full environmental impacts of a floodwall/levee system, including impacts on amphibious wildlife, shallow water habitats and downstream environments.

Do not alter or compromise streams that flow into and out of Dyke Marsh.

#### Cost vs. Life of Project

The study cites as the cost of the Belle Haven floodwall/levee system \$25 million and that the federal government will pay 65 percent and non-federal entities will pay 35 percent of that cost for pre-construction engineering and design and construction. The study cites as the annualized cost "\$16,000 for Belle Haven."

The study describes the "period of analysis" as 50-years per ER 1105-2-100 Planning Guidance Notebook, but it fails to explain the projected life of the floodwall/levee system under various sea level rise scenarios, updated rainfall projections and other events, whether the cost estimate covers future maintenance, repairs and replacement if it fails. The study does not examine its potential to fail.

The study's purpose is "to evaluate the feasibility of federal participation in the implementation solutions," but fails to evaluate funding sources or the feasibility of local or state participation, except for two letters from two Fairfax County officials and none from state or federal officials.

**Recommendations:** Provide a projection of the total life of the Belle Haven floodwall and levee project and other alternatives considered and the costs over time. Identify committed sources of funding.

#### The Study Omits Stronger Stormwater Control Systems

Sudden, intense storms like derechos can generate and overwhelm stormwater systems and cause flooding.

It is not clear what rainfall projections the Corps is using (see, for example, NOAA's Mid-Atlantic RISA team, <u>https://midatlantic-idf.rcc-acis.org/</u>, 2022 to 2070 projected intensity-duration-frequency).

Most of the immediate area west of the parkway has lost much of its natural flood control potential because Fairfax County has allowed development, fill and impervious surfaces to be built. For example, part of the Belle Haven Golf Course is on former wetlands, land created by fill. Some of the land, buildings and development are in former floodplains and wetlands. Fairfax County operates tide gates and pumping stations in the area.

The National Park Service has a *national* mission to manage a system of national parks for the greatest public good. Localities should address the *local* problems, including adverse environmental conditions, that they have created.

**Recommendation**: Use the most current rainfall projections. Evaluate local stormwater control systems' ability to manage rainfall and stormwater runoff using the most current rainfall projections. Identify opportunities and approaches for Fairfax County to upgrade the current stormwater control system to better respond to flooding from all types of storms.

#### The Study Inadequately Evaluates Endangered and Threatened Species

On page 13, the study identifies some federal and state-listed species "that have the potential to be present in the study area."

The study on page 13 states, "Each species was further assessed to determine if suitable habitat conditions are present." Some in fact have been documented as present, including the peregrine falcon and the monarch butterfly, a federal candidate species.

Table 2-1 on page 14 lists three species of bats "that have the potential to be present in the study area."

Observers have documented the following bats in Dyke Marsh, including west Dyke Marsh near the site for a proposed levee, including the three listed on table 2-1:

- Big brown bat, *Eptesicus fuscus* (very common)
- Silver-haired bat, *Lasionycteris noctivagans* (common during spring and autumn)
- Eastern red bat, *Eptesicus fuscus* (very common)
- Hoary bat *Lasiurus cinereus* (common during spring and autumn)
- Northern long-eared bat, *Myotis septentrionalis* (occasional)
- Evening bat, *Nycticeius humeralis* (common)
- Brazilian free-tailed bat *Tadarida brasiliensis* (new migrant to Virginia, common)
- Seminole bat, *Lasiurus seminolus* (occasional)
- Little brown bat, *Myotis lucifugus (*rare)
- Tri-colored bat, *Perimyotis subflavus (*rare)

While no longer listed as federally endangered the bald eagle is protected by other laws. The study on page 129 cites bald eagle nests confirmed in 2018. This data is very out of date. The Dyke Marsh Wildlife Preserve has had active bald eagle nests every year in recent years, including three active nests in 2022.

On page 19, the study refers to a 40-year-long bird list of 296 species in Dyke Marsh compiled by the Friends of Dyke Marsh, 2021. It is not clear which bird survey this is referring to. The annual breeding bird survey is only one of several bird surveys available.

The Friends of Dyke Marsh, the Audubon Society of Northern Virginia, George Mason University, the Virginia Herpetology Society, the Virginia Native Plant Society, the National Park Service and others have survey data.

**Recommendation**: Use existing survey data that confirms actual species present, as opposed to those potentially present and conduct comprehensive surveys to determine others that are in fact present. Document how the destruction of trees and other vegetation would impact wildlife.

#### **Community Opposition Continues**

When the Corps recommended a combination levee/floodwall around the area in 2014, the "project was not implemented due to community opposition to the project" (page 76). It appears that such a proposed floodwall and levee still face significant community concerns, some of which were expressed at the Corps' June 14, 2022, public meeting.

*Recommendation*: Continue to invite public comments and hold additional public meetings.

From: Sent:	(b) (6) Tuesday, July 26, 2022 10:55 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study
Attachments:	Army Corps of Engineers letter.docx

Hello,

Please see attached. (Hard copies will be mailed via USPS to Senator Mark Warner and Senator Tim Kaine.)

Thank you -



July 26, 2022

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

- It does not address stormwater flooding, which has already proven to be a significant problem in our area
- It does not address the aesthetic and pragmatic needs of the community and the loss of amenities
- The current plan includes destruction of property and will negatively impact the property values of the affected neighborhoods
- The current plan would destroy many of our natural resources, including trees and wetlands, which naturally mitigate flooding and global warming, and which should be enhanced, not destroyed
- The plan negatively affects Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County
- The plan does not address how wildlife will traverse the flood wall and levee
- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.

#### Sincerely,



## Roach, Andrew <sup>(D) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Tuesday, July 26, 2022 4:41 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Flood Mitigation Plan 8

I wish to express my very strong objection to Plan 8.

In the course of attempting to address the storm surge issues, this plan will this plan will put my home and myself at more, not less, risk.

I have lived in the Wellington/Belle View area since 1958. Our problem is with river flooding following heavy rain upstream, not with storm surge.

This plan prioritizes defending against the rare storm surge of Hurricane Isabel rather than the more frequent Potomac River flooding which can swamp parts of New Alexandria and Belle View. It will not only <u>not</u> address that issue; it will make matters significantly worse here.

I live in River Towers, at (b) (6) . You will destroy our community. You propose to rip away a third of our property. You will surround and isolate my building with high berms. Where now (and during Isabel) water flows off the parking lots, you want to remove them, creating instead a catch--basin where flood water can pool. The small corner of the utility room that is considered below grade did not even take on water during Isabel. The massive construction may damage our building and increase the settling. This scheme would reduce my home to an undesirable dwelling hemmed in by berms and potentially surrounded by water.

The construction and final plan will imperil me and my neighbors. It was revealed during the 14 June meeting that our ability to evacuate has not even been considered. (During Isabel, River Towers was officially evacuated.)

Plan 8 will damage the Dyke Marsh wetlands and the bird sanctuary adjacent to River Towers which NPS and the Friends of Dyke Marsh have worked to protect.

I urge you to consider a less procrustian plan.

Very truly yours,



,

From:	(b) (6)
Sent:	Monday, July 25, 2022 9:43 AM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Belle Haven Flood Wall & Levee

Dear Sirs: This is my comment on the proposal for the Belle Haven Flood Wall & Levee. First, having walked through knee deep water in the Belle Haven neighborhood after Hurricane Isabel, I am thoroughly in sympathy with residents who want some protection against similar storms, river rise, and expected effects of climate change. I strongly support the "Tentatively Selected Plan, Alternative No. 8." This alternative will provide maximum protection to the affected areas while preserving the historic nature of the George Washington Parkway. Putting the levee walls on the east side of the the parkway should be an unacceptable solution. It would be an ugly intrusion on the picnic area and of Dyke Marsh, the latter something that George Washington would have seen as he rode home to Mount Vernon. Future generations of Americans should have the opportunity to experience that same viewshed. Thank you for your time and attention. (b) (6)

From:	(b) (6)
Sent:	Tuesday, July 19, 2022 11:31 AM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source]

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

- It does not address stormwater flooding, which has already proven to be a significant problem in our area
- It does not address the aesthetic and pragmatic needs of the community and the loss of amenities
- The current plan includes destruction of property and will negatively impact the property values of the affected neighborhoods
- The current plan would destroy many of our natural resources, including trees and wetlands, which naturally mitigate flooding and global warming, and which should be enhanced, not destroyed
- The plan negatively affects Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County
- The plan does not address how wildlife will traverse the flood wall and levee
- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.



Sent from my iPhone

From:	(b) (6)
Sent:	Tuesday, July 19, 2022 10:32 AM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] NOVA Coast Study

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

- It does not address stormwater flooding, which has already proven to be a significant problem in our area
- It does not address the aesthetic and pragmatic needs of the community and the loss of amenities
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- The plan negatively affects Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County
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- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.

Sincerely,

#### (b) (6)

# Roach, Andrew <sup>(D) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Monday, July 18, 2022 11:53 AM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] DC Metro CSRM Study

I am writing to express thoughts on the proposal to erect a flood wall on the western side of the George Washington Memorial Parkway in the Belle Haven neighborhood of Alexandria. I strongly oppose any plans to erect this structure.

I was unable to attend the presentation of plans, which were not advertised very widely or aggressively. I did view the presentation online.

I strongly disagree with the approach to build this wall on the western side of the parkway. It will be an eyesore, a disruption to residents living in the Belle Haven area, and a traffic hazard likely to cause an increase in injuries to pedestrians and cyclists who are trying to cross the GW Parkway. Right now, due to the inane traffic patterns at the intersection of Belle Haven Blvd and Belle View Blvd, and the lack of a safe crossing over the GW Parkway, pedestrians who want to access the bike path are forced to cross the parkway at points other than these intersections. A six-foot wall will force them into crossing at the intersections, which already see dozens of vehicular accidents each year. Please do not make these intersections any more dangerous to drivers or pedestrians.

If the wall is deemed necessary, it should be built on the eastern side of the parkway. I understand that is National Park land. For years, officials have shrugged off any responsibility for addressing the problems the aging and oversued Parkway has caused, using the excuse that it is federal land. Well, someone, somewhere must have the phone number to someone who works in NPS. Let's engage them in this conversation for once.



From:         (b) (6)           Sent:         Saturday, July 16, 2022 4:28 PM
To: DC-Metro-CSRM-Study
Cc: (b) (6)
Subjects [New DeD Source] Fleed Mitigation Plan

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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  mitigate flooding and global warming, and which should be enhanced, not destroyed
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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway. Thank you for taking the time to read my letter.

Sincerely,

(b) (6)
From: Sent:	(b) (6) Saturday, July 16, 2022 4:09 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] NOVA Coast Study - Flood Mitigation Plan

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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- The plan negatively affects Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County
- The plan does not address how wildlife will traverse the flood wall and levee
- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway. Thank you for taking the time to read my letter



Roach, Andrew (b) (6) USARMY CENAB (USA)	
From:	(b) (6)
Sent:	Saturday, July 16, 2022 3:45 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Flood Mitigation Plan

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

- It does not address stormwater flooding, which has already proven to be a significant problem in our area
- It does not address the aesthetic and pragmatic needs of the community and the loss of amenities
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- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.



## Roach, Andrew<sup>(b) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Saturday, July 16, 2022 7:10 AM
То:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] levee

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

- It does not address stormwater flooding, which has already proven to be a significant problem in our area
- It does not address the aesthetic and pragmatic needs of the community and the loss of amenities
- The current plan includes destruction of property and will negatively impact the property values of the affected neighborhoods
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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.

(b) (6)

\*\*\*\*\*\*

#### FOLLOWING IS MY OWN LETTER I SENT OUT ON 25 JUNE

For the Engineers:

I have not read the various documents pertaining to the levee at Belle-View. I doubt I would understand the technical points. I am certainly not capable of commenting on them.

But looking at the aerial photos, there is one obvious question: Why is the levee on the west side of the Parkway? It

would seem foolish to abandon the 4-lane parkway to flooding when it might be saved by moving the levee a few hundred feet to the east. In fact, when I heard mention of a levee, my first thought was a seawall structure running right along the banks of the river.

As for River Towers itself, it should be noted that during Isabel many years ago, the flooding reached almost to the front and back door of building 41, but it came up the street from the east, and from the west via our sludgy little canal. None of it came from the marsh behind the buildings on the south. Although no deterrent is needed in that area, the proposal places a levee and pumping station there, destroying the tennis courts and picnic area.

Our beloved buildings are the epitome of function, not elegance; the majesty of RT is our grounds. Anything that detracts from their natural beauty is an insult.

Our grounds are lovely in every direction but the marsh is unique. After a day of being functional at work and coming home to functional architecture, a few minutes standing on the bank of the marsh can provide a wonderful moment of mind restoration. Having to view our marsh over a levee and pumping station in the foreground would be like viewing an ancient, magnificent cathedral with a sleazy hot-dog stand on the front lawn.

I am certainly in favor of the levee to prevent flooding, but **put the thing where it belongs** on the other side of the parkway.

Regards, (b) (6) ,

(b) (6)

From:	(b) (6)
Sent:	Friday, July 15, 2022 5:07 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Metropolitan Washington District of Columbia Coastal Storm Risk Management
	Feasibility Study

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

- It does not address stormwater flooding, which has already proven to be a significant problem in our area
- · It does not address the aesthetic and pragmatic needs of the community and the loss of amenities
- The current plan includes destruction of property and will negatively impact the property values of the affected neighborhoods
- The current plan would destroy many of our natural resources, including trees and wetlands, which naturally
  mitigate flooding and global warming, and which should be enhanced, not destroyed
- The plan negatively affects Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County
- The plan does not address how wildlife will traverse the flood wall and levee
- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway. Thank you for taking the time to read my letter.



From:	(b) (6)
Sent:	Friday, July 15, 2022 1:23 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] NOVA Coast Study - Regarding the Flood Mitigation Plan

U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study which would entail building a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, directly impacting the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

- It does not address stormwater flooding, which has already proven to be a significant local problem
- It does not address the aesthetic and pragmatic needs of the community and ensuing loss of amenities
- The current plan destroys property and will negatively impact the property values of the affected neighborhoods
- The current plan destroys many of our natural resources, including trees and wetlands, which naturally mitigate flooding and global warming
- The plan negatively affects Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County
- The plan does not address how wildlife will traverse the flood wall and levee
- The plan will create temporary noise from the construction and long-term noise from the proposed pumping station, negatively affecting the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.

Sincerely,



, potentially impacted resident and concerned citizen

From:	(b) (6)
Sent:	Friday, July 15, 2022 1:03 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] FLOOD MITIGATION PLAN

7/15/2021

#### Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

- It does not address stormwater flooding, which has already proven to be a significant problem in our area
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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.



From:	(b) (6)
Sent:	Friday, July 15, 2022 12:58 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] FLOOD MITIGATION PLAN

7/15/2021

#### Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.

Sincerely,



Sent from my iPad

From:	(b) (6)
Sent:	Thursday, July 14, 2022 7:29 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source]

Sent from Mail for Windows

From:	(b) (6)
Sent:	Thursday, July 14, 2022 4:19 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[URL Verdict: Neutral][Non-DoD Source] USACE Proposal
Attachments:	RT USACE.pdf

Hello,

Please see the attached letter.

Thank you for your time and consideration.



\* registered representative offering securities through NYLIFE securities LLC (member FINRA/SIPC) A licensed insurance agency, financial advisor offering investment advisory services through Eagle Strategies LLC, a registered investment advisor, (b) (6)
 . Eagle Strategies and NYLIFE Securities are New York life companies. Gentile Financial Group is not owned or operated by NYLIFE Securities LLC, Eagle Strategies LLC, or its affiliates. If you do not wish to receive email communications from NYLIFE Securities, Eagle Strategies or Gentile Financial Group, please reply to this email, using the words "opt out" in the signature line. Please copy email (b) (6)

7/14/ 2022

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.



Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)	
From:	(b) (6)
To:	DC-Metro-CSRM-Study
Cc:	(ð) (d)
Subject:	[Non-DoD Source] The Flood Mitigation Plan at New Alexandria, Belle View and River Towers

To: U.S. Army Corps of Engineers

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.



Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)	
From:	(b) (6)
Sent:	Thursday, July 14, 2022 7:41 AM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Nova coastal study comments from community member

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.



From: Sent:	(b) (6) Wednesday, July 13, 2022 6:11 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Regarding the Flood Mitigation Plan

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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-The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.



From:	(b) (6)
Sent:	Wednesday, July 13, 2022 5:06 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Belle View Floodwall and Levee Comments

I am a Belle View Condo owner. I am strongly opposed to the proposed floodwall and levee.

I would like to see natural flood control solutions including restoration of Dyke Marsh. I understand natural solutions won't prevent inundation -- but it would provide some reduction of damage.

I want to see a comprehensive study of flood risk mitigation on both sides of the Potomac River. This study seems too piecemeal. <u>Surge protection</u> would potentially protect a much larger area on Virginia and Maryland shores.

In time, global warming and climate change will breech this floodwall. I prefer ACE undertake projects to restore habitats and enhance water quality. I bought my condo here knowing it's not for the long term. I <u>love</u> living here close to the Potomac River. However, when the river wants to be here, I think property owners should be bought out, the buildings demolished, and wetland habitat restored. Fairfax County should never have allowed building here in the first place!



From:	(b) (6)
Sent:	Wednesday, July 13, 2022 4:03 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Flood Mitigation Plan - NOVA - RIVER TOWERS/DYKE MARSH

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

- It does not address stormwater flooding, which has already proven to be a significant problem in our area
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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway. Thank you for taking the time to read my letter.



(b) (6)

P.S. I have been an (b) (6) at River Towers for we years and I am seriously distressed by the questionable nature of many aspects of your proposed project, as well as the serious affect it will have on my property value. Thank you for your consideration, (D)

From:	(b) (6)
Sent:	Wednesday, July 13, 2022 3:12 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] River Towers Flood Mitigation Plan
Attachments:	NOVA Coast Study Letter.pdf

Attached, please find my letter regarding the Flood Mitigation Plan for Alexandria, Virginia.

Thank you for your attention to this matter. As stated in my letter, please re-consider other water mitigation options.



July 13, 2022

#### DC-Metro-CSRM-Study@usace.army.mil

Re: Flood Mitigation Plan

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway. Thank you for taking the time to read my letter.





Thank you very much for your support and response.

Thank you and best regards,



On Wed, Jul 13, 2022 at 2:08 PM Storck, Dan(b) (6)

wrote:

Hi (b) (6), thank you for your email comments about the USACE flood wall proposal. I am forwarding them to the Corps who are the leaders of this project soliciting the comments. This is not a Fairfax County project. While I strongly support and have been a strong advocate for addressing the flood protection needs of the Belle View/New Alexandria communities, this proposal is not the way to do it. I look forward to working with the USACE, the National Park Service and our community to identify options that can better address our critical need for flood and storm protection.

Respectfully yours in public service,

Dan Storck

Supervisor

Mount Vernon District

2511 Parkers Lane

Alexandria, VA 22306

Main: 703-780-7518

www.fairfaxcounty.gov/MountVernon

# Introducing Potomac Banks – Explore Fairfax South!



For the latest updates on Coronavirus (COVID-19), visit the <u>County's webpage</u> and <u>subscribe to our newsletter</u>.



Please be advised, unless otherwise requested, that your email address will be added to our Mount Vernon District Advisor (newsletter) distribution list. Additionally, correspondence with Supervisors is subject to the Virginia Freedom of Information Act (FOIA). This means that your correspondence may be made public if someone requests it. Only a few matters are exempt from disclosure, including personnel information about individual employees.

From: (b) (6) Sent: Wednesday, July 13, 2022 1:53 PM To: Storck, Dan (b) (6) Cc: (b) (6)

Subject: US Army Corps of Engineers Regarding the Flood Mitigation Plan

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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• The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.

Sincerely,

(b) (6)

Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)		
From:	(b) (6)	
Sent:	Wednesday, July 13, 2022 2:49 PM	
To:	DC-Metro-CSRM-Study	
Cc:	(b) (6)	
Subject:	[Non-DoD Source] Regarding the Flood Mitigation Plan	

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.



Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)		
From:	(b) (6)	
Sent:	Wednesday, July 13, 2022 2:42 PM	
To:	DC-Metro-CSRM-Study	
Cc:	(b) (6)	
Subject:	[URL Verdict: Neutral][Non-DoD Source] US Army Corps of Engineers Regarding the Flood Mitigation	
	Plan	

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.



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## Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)



Hi (b) (6), thank you for your email comments about the USACE flood wall proposal. I am forwarding them to the Corps who are the leaders of this project soliciting the comments. This is not a Fairfax County project. While I strongly support and have been a strong advocate for addressing the flood protection needs of the Belle View/New Alexandria communities, this proposal is not the way to do it. I look forward to working with the USACE, the National Park Service and our community to identify options that can better address our critical need for flood and storm protection.

Respectfully yours in public service,

Dan Storck Supervisor Mount Vernon District 2511 Parkers Lane Alexandria, VA 22306 Main: 703-780-7518 www.fairfaxcounty.gov/MountVernon

# Introducing Potomac Banks – Explore Fairfax South!



For the latest updates on Coronavirus (COVID-19), visit the <u>County's webpage</u> and <u>subscribe to our newsletter</u>.



Please be advised, unless otherwise requested, that your email address will be added to our Mount Vernon District Advisor (newsletter) distribution list. Additionally, correspondence with Supervisors is subject to the Virginia Freedom of Information Act (FOIA). This means that your correspondence may be made public if someone requests it. Only a few matters are exempt from disclosure, including personnel information about individual employees. From: (b) (6) Sent: Wednesday, July 13, 2022 1:53 PM To: Storck, Dan (b) (6) Cc: (b) (6)

**Subject:** US Army Corps of Engineers Regarding the Flood Mitigation Plan

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

- It does not address stormwater flooding, which has already proven to be a significant problem in our area
- It does not address the aesthetic and pragmatic needs of the community and the loss of amenities
- The current plan includes destruction of property and will negatively impact the property values of the affected neighborhoods
- The current plan would destroy many of our natural resources, including trees and wetlands, which naturally mitigate flooding and global warming, and which should be enhanced, not destroyed
- The plan negatively affects Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County
- The plan does not address how wildlife will traverse the flood wall and levee
- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.



From:	(b) (6)
Sent:	Wednesday, July 13, 2022 2:08 PM
lo:	DC-Metro-CSRM-Study
Cc:	(0) (0)
Subject:	[Non-DoD Source] Comment Regarding Metropolitan Washington District of Columbia Coastal
	Storm Risk Management Feasibility Study

#### To: U.S. Army Corps of Engineers ("USACE")

I write in reference to proposals in the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I welcome the USACE's efforts to institute appropriate measures to mitigate the coastal flood risk to critical public and private infrastructure along the west bank of the Potomac River in Northern Virginia. Nevertheless, I must express my concern in relation to the specific proposal in the study under which, if implemented, the USACE would construct a flood wall, levee, and pumping station in the Alexandria section of Fairfax County. Such action would significantly and adversely impact the neighborhoods of New Alexandria, Belle View and River Towers. Moreover, this particular aspect of the plan is fundamentally flawed for a number of reasons. For example, the plan:

• Does not address storm water flooding, which has already proven to be a significant problem in the affected area

Does not address the aesthetic and pragmatic needs of the community and the loss of amenities

• Would lead to destruction of property and will negatively impact the property values of the affected neighborhoods

• Would destroy natural resources, including trees and wetlands, which naturally mitigate flooding, and which should be enhanced, not destroyed

• Negatively impacts Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County

Does not address the ability of wildlife to traverse the flood wall and levee

• If implemented, would give rise to noise not only during the construction phase, but on a continuing basis owing

to operation of the proposed pumping station - all of which will negatively affect the quality of life for both residents and wildlife

As an alternative to the plan currently under consideration, I urge re-consideration of other flood mitigation options which were previously proposed by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for your consideration of these comments.



From:	(b) (6)
Sent:	Wednesday, July 13, 2022 2:09 PM
To: Cc:	DC-Metro-CSRM-Study (b) (6)
Subject:	[Non-DoD Source] Regarding the Flood Mitigation Plan

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

- It does not address stormwater flooding, which has already proven to be a significant problem in our area
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- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.



From:	(b) (6)
Sent:	Wednesday, July 13, 2022 2:07 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[URL Verdict: Neutral][Non-DoD Source] NOVA Coast Study

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.

Sincerely,

Thomas



From:	(b) (6)
Sent:	Wednesday, July 13, 2022 2:04 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[URL Verdict: Neutral][Non-DoD Source] US Army Corps of Engineers Regarding the Flood Mitigation
-	Plan

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.



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Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)	
From:	(b) (6)
Sent:	Wednesday, July 13, 2022 2:04 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Metropolitan Washington District of Columbia Coastal Storm Risk Management
	Feasibility Study Negative Impact on River Towers 22307

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.





From:	(b) (6)
Sent:	Wednesday, July 13, 202 <u>2 2:02 PM</u>
To:	DC-Metro-CSRM-Study; (b) (6)
Subject:	[Non-DoD Source] FW: RT - NOVA Coast Study/Impact on River Towers Condominium
	Community/US Army Corp of Engineers Flood Mitigtion Plan

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.



Roach,	Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)
From:	(b) (6)
Sent:	Wednesday, July 13, 2022 1:49 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] DC-Metor-CSRM-Study

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.



## Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Wednesday, July 13, 2022 1:46 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Dyke Marsh

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding

additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.

Sincerely,



Sent from my iPhone
### Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)

From: Sent:	(b) (6) Wednesday, July 13, 2022 1:44 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Regarding the Flood Mitigation Plan

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.



### Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)			
Sent:	Wednesday, July 13, 2022 1:37 PM			
To:	DC-Metro-CSRM-Study			
Cc:	(b) (6)			
Subject:	[Non-DoD Source] NOVA COAST STUD			

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.

Sincerely, (b) (6) Sent from my iPhone

From:	(b) (6)
Sent:	Wednesday, July 13, 2022 1:24 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study

Dear U.S. Army Corps of Engineers and Our Elected Officials,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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From:	(b) (6)
Sent:	Wednesday, July 13, 2022 1:09 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.



From:	(b) (6)
Sent:	Wednesday, July 13, 2022 1:00 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Fwd: RT - NOVA Coast Study Form Letter

Dear U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community.

However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, namely:

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- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.



From:	(b) (6)
Sent:	Monday, July 11, 2022 8:04 AM
To:	DC-Metro-CSRM-Study
Subject:	[URL Verdict: Neutral][Non-DoD Source] Here are my comments on the Corps' Draft Integrated
	Feasibility Report and EA (May 2022), and to object to the proposed Belle Haven flood wall until a
	entirely removable post and panel floodwall is considered.

Back on June 15, 2022, as a former Belle View resident who now lives downstream near the Potomac River, I submitted comments that objected to the Corps' proposed Belle Haven floodwall, until and unless it has documented that it has fully considered alternative storm flood solutions. If it is determined that no other alternative storm flood solution exists other than a floodwall, however, I believe that the Corps must first consider as an alternative, the use of <u>an entirely removable post and panel floodwall</u>, instead of a permanent concrete floodwall.

As you know, the Corps' proposed floodwall would consist of a 6- to 7-foot-high concrete wall just west of the George Washington Memorial Parkway, which would permanently obstruct residents' eastern views of the park's natural areas. The proposed floodwall would also have removable "aluminum stop-log closures" but only at the street intersections, that would be installed and connected to the wall in the event a storm flood is expected.

An <u>entirely removable post and panel floodwall</u>, however, will not permanently obstruct residents' views since it would be installed only when a storm flood is expected, and should garner local community support. A removable post and panel floodwall has been used as part of a flood control project by the Corps and NPS at the National Mall's 17th Street levee. Further, as part of the planning process for the Mall's 17th Street levee project, Flood Control America LLC submitted information on their "invisible flood control wall" projects that consist of removable post and aluminum panel floodwalls.

According to Flood Control America's website at <u>floodcontrolam.com</u>, their removable floodwalls "meets all U.S. Army Corps of Engineers design criteria for flood walls and has been utilized on several Corps of Engineers projects." It has been successfully used at St. Paul Downtown Airport, St. Paul, Minn. which is "one of the largest removable flood wall installations in the world, spanning runways on the banks of the Mississippi River." They also report that Virginia Polytechnic Institute and State University concluded that their removable floodwall system is the "No. 1 alternative" in its comprehensive flood control study, "Innovative Alternatives to Conventional Levees For Flood Protection." Below is their two-page brochure as well as several photographs they submitted to the NPS that depict their "invisible flood control wall" projects.

The Corps' reexamination to consider an <u>entirely removable post and panel floodwall</u>, instead of a permanent concrete floodwall, is critical. It is consistent with 40 CFR 1502.14(a)(b), which requires that "[t]he alternatives section should present the environmental impacts of the proposed action and the alternatives in comparative form based on the information and analysis presented in the sections on the affected environment and the environmental consequences. In this section, agencies shall: (a) Evaluate reasonable alternatives to the proposed action, and, for alternatives that the agency eliminated from detailed study, briefly discuss the reasons for their elimination. (b) Discuss each alternative considered in detail, including the proposed action, so that reviewers may evaluate their comparative merits...."

Respectfully submitted, (b) (6)



Flood Control America is the leading supplier of removable flood walls in the United States.

Since 1997, FCA has placed over two hundred installations from coast to coast and border to border.

Our Invisible Flood Control Wall<sup>TM</sup> is manufactured entirely in the United States, supporting American industry and American workers.

American-made. Protecting and preserving the United States since 1997.







The Invisible Flood Control Wall ((FCW<sup>TM</sup>) is a removable floodmall that is erected only when flooding is imminent. The system is composed of gasketed aluminum planks and steel posts, which are quickly mountable and watertight. The days of choosing between flood protection or undistructed niver views and access are over.

The basis for the system is galvanized steel plates that are poured into a reinforced concrete foundation. The plates are poured flush and headless "storage" bolts are used when the wall is demounted to ensure that nothing protrudes and the system remains "invisible."

To erect the wall, steel parting supports are secured to the embedded plates using anchor bots.

Our extruded aluminum planks simply slide between the parting supports to create a wall. The planks are fit with gaskets on the "dry" side so that during a flood event they can fill with water to add to the strength and integrity of the system. The planks also interlock to protect against impact loads.

Intermediate support posts sit behind the wall to bear middle loads in plank sections. Higher walls may require angle braces to support additional loads.

Compression channels and hold-down clamps seal the system against all vertical and horizontal gaskets, creating a watertight system.

The IFOW is efficiently stored in bundled stacks. Aluminum plank bundles contain 40 planks, measure 3.5' x 2.5', and contain enough wall to protect 80 lineal feet at 7" high.

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Nultiple bundles are easily stacked with durnage for easy picking. Steel posts and struts can be ordered with racks for convenient storage of the entire system.

All components of the Invisible Rood Control Wall are sourced and manufactured in the United States, including the rubber gaskets, aluminum, and steel features. "Sandbagging is labor intensive. Then when the emergency passes, nobody is left to dispose of the sandbags. With the IFCW panels, you only put up what you need. They're light, so you only need a few people. We're really happy with it...we could maintain the view of the river that way."

> - Ron Arends, City Engineer Cedar Falls, Iowa

'It worked like a charm."

Mark Bittner, Gty Engines
Fargo, North Dakota

"We had to be able to see the river and protect ourselves from it to keep our history the way it should be. The Invisible Flood Control Wall was the solution... We would have a 12-foot concrete wall there right now if it weren't for the IFCW. Many people comment on how attractive the approach to the riverfront is. They don't feel like they're driving into a flood control project."

> Gary Sanders, City Engineer East Grand Forks, Minnesota



ph: 978.440.8902 fx: 978.440.8903 floodwall@floodcontrolam.com www.FloodControlAm.com







FLOOD CONTROL AMERICA



FCA







FI.





From:Homer, Allison (b) (6)Sent:Tuesday, July 5, 2022 9:36 AM	
To: (b) (6)	
Cc: DC-Metro-CSRM-Study	
Subject: [URL Verdict: Neutral][Non-DoD Source] RE: Flood Wall proposal around Belle View and	<b>River Towers</b>

Dear (b) (6)

Thank you for your feedback on behalf of your community! We want to ensure that your valuable comments reach the correct entity. The Tentatively Selected Plan relating to the floodwall is managed by the United States Army Corps of Engineers (USACE), rather than our office (Fairfax County OEEC). I have CC'd them here, but to ensure your comments are received (if you haven't already), please send your comments directly to the USACE email address at <u>DC-Metro-CSRM-Study@usace.army.mil</u>.

Our local office's initiative, "<u>Resilient Fairfax</u>," is different from USACE's floodwall plan. Resilient Fairfax is broad, countywide initiative to make Fairfax County more resilient to a range of climate hazards, including extreme heat, heavy precipitation, and increasingly severe storms. In case you are interested in our office's work, I have included links to Resilient Fairfax resources below.

- Draft Resilient Fairfax Plan
- <u>Resilient Fairfax Climate Map Viewer</u>
- Longer technical reports can be found below, if there is interest in additional detail:
  - o <u>Climate Projections Report</u>
  - o <u>Climate Vulnerability and Risk Assessment</u>
  - o Audit of Existing Policies, Plans, and Programs

We are more than happy to answer any questions about Resilient Fairfax. Questions relating to USACE's floodwall proposal are best directed to USACE.

Thank you again,

Allison

Allison Homer, AICP, LEED AP ND

Planner IV, Senior Community Specialist Office of Environmental and Energy Coordination 12000 Government Center Parkway, Suite 533 Fairfax, Virginia 22035 571-460-8385 Follow us on Twitter Follow us on Facebook



From: OEEC Info(b) (6)

Sent: Tuesday, June 28, 2022 10:28 AM

To: Homer, Allison (b) (6)

Subject: FW: Flood Wall proposal around Belle View and River Towers

Hello Allison,

Here is a response to Resilient Fairfax and the ACE project.

Thanks, (b) (6)

From: (b) (6) Sent: Monday, June 27, 2022 6:38 PM To: OEEC Info (b) (6) Subject: Flood Wall proposal around Belle View and River Towers

Hi

Please read the attached letter of concern. I am opposed to the current plan.

Thank you



Roach, Andrew	<sup>(6)</sup> USARMY CENAB (USA)
From:	(b) (6)
Sent:	Thursday, June 30, 2022 11:57 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	Non-DoD Source] Proposal Regarding River Towers and the Greater Belle View Community

Good evening.

I adamantly oppose the proposed flood plan of the U.S. Army Corps of Engineers and the Fairfax County Office of Environmental and Energy Coordination for the Greater Belle View Community, including River Towers. In planning to seize 30% of River Tower's property by eminent domain, the government has overstepped its bounds. Fairfax County and the federal government will, by their proposed action, lower our property value, limit access to our amenities, and cause noise pollution. The invasive plan will also hinder evacuation from two of our buildings. Further, the plan only partially addresses the flooding problem. It may stop tidal flooding but it would not stop storm runoff, which has damaged River Towers in the past and the plan would cause flood waters to pool around the property and inside the buildings.

It is important to protect our neighborhood from flooding but it is also important to protect the safety and property of Belle View's residents. The proposed plan indicates a gross disregard for the safety and property of Belle View residents. Alternatives must be considered and local and federal governments must do better.

Thank you.



From:	(b) (6)
Sent:	Thursday, June 30, 2022 6:12 PM
То:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Belle Haven Floodwall and Levee

To whom it may concern at USACE:

As a member of the Belleview and River Towers communities for 20+ years, I am strongly opposed to the currently proposed plan - Alternative 8. I know a multitude of residents of this community are equally opposed to this plan. As an attendee of the outreach meeting held on June 14th, questions from community members received incomplete responses, at best.

There is far too little consideration of the negative impact this plan would have on this established and loved community.

Like all River Tower residents, I was drawn to this property for the extensive amenities, including the tennis and basketball courts, playground, picnic grove, parking lots, and garden. The proposed plan would obstruct at best, obliterate at worst these valued amenities. In addition, it would involve noisy and invasive construction adjacent to all three buildings, and negatively affect our property values.

Furthermore, the proposed plan would only address tidal flooding, but not water from storm runoff, which has caused flooding in our community previously. As a River Towers resident, there are also serious safety concerns. The proposed plan could affect our ability to evacuate the 6621 and 6631 buildings in the event of an emergency and could actually cause flood waters to pool around and inside River Towers.

More discussion with the community *must* occur before USACE can consider moving forward with any flood mitigation plans.

Thank you, (b) (6)

From:	(b) (6)
Sent:	Thursday, June 30, 2022 12:53 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] belle haven wall

Dear Army Corp:

While I sincerely appreciate your intent to mitigate flood sin the Belle Haven area, I am deeply disappointed the same plan presented 5 or so years ago was presented again.

So you dont listen. Confirmed. . I dont understand why the wall cannot be built on the other side of the parkway, nearer to the water.

Perhaps no one wants to rock the boat or do the smart thing or the right thing? Its not the best solution for those who live here. Not by a long shot. I am tired of government taking the easy way out and serving themselves and not progressing. or moving an inch or listening to those who pay their salaries.

In other countries prone to flooding, they have walls the elevate as needed. They listen to the citizens and they INNOVATE.

Here, the government just doubles down on bad ideas.

PLEASE DONT PROCEED WITH THIS OLD APPROACH.

Sincerely,

From:	(b) (6)			
Sent:	Thursday, June 30, 2022 11:58 AM			
To:	DC-Metro-CSRM-Study			
Subject:	[URL Verdict: Neutral][Non-DoD Source] Comments on DC Coastal Storm Management Study			
Attachments:	Coastal Storm Mgmt Study - 4MR Conservatory Foundation comments 6-30-2022 with attachment.pdf			

Good afternoon --

Attached please find written comments from the Four Mile Run Conservatory Foundation on the Draft Integrated Feasibility Report and Environmental Assessment. Thank you for the opportunity to comment.



Mr -

30 June 2022

US Army Corps of Engineers, Baltimore District 2 Hopkins Plaza Baltimore, MD 21201

RE: DC Metro Area Coastal Storm Risk Management Feasibility Study Draft Integrated Feasibility Report and Environmental Assessment

To whom it may concern:

Having reviewed the draft report and assessment for the Coastal Storm Risk Management Study, the Four Mile Run Conservatory Foundation would like to submit comments on the report and request clarification on several points relating to the study. Our non-profit volunteer organization promotes nature, culture, and community at lower Four Mile Run through restoration, advocacy, recreation, and education, and as a community- and placebased organization, we are very familiar with the natural and recreational resources of the tidal stretch of Four Mile Run and Four Mile Run Park.

We have several comments specific to the Tentatively Selected Plan and to Alternative 5a, both of which involve lower Four Mile Run. We support the protection of the Arlington Water Pollution Control Plant (Alternative 4c), as coastal flooding at this site would be a disaster for human health and for the environment, though we have concerns about archaeological and natural resources that seem to have been overlooked in the study. We have stronger concerns about the floodwall/levy proposed under Alternative 5a, specific to the alignment and to impacts and affected uses that are missing from the study. Our concerns include the following:

- Section 4.1.5 (Anadromous Fish) suggests that diversity of fish is limited at Four Mile Run Park, which is incorrect. Photo observations posted to the iNaturalist citizen-science platform show that lower Four Mile Run supports at least 22 fish species. In addition, anadromous alewife (*Alosa pseudoharengus*) have been observed in the Hume Spring tributary ("East Stream" in the report) during the spring spawning season, right at the concrete bridge where the proposed floodgate would be installed.
- Although in section 4.1.6 (Migratory Birds) the report states that no bird habitat is known to occur at or adjacent to these project areas, we doubt this to be the case. Lower Four Mile Run and Four Mile Run Park feature a variety of bird habitats,

particularly in the time since wetland and meadow restoration projects were completed in 2016-2017. The park has become a well-loved birding destination because of the biodiversity here. Many breeding-season migratory bird species are found in the park, and at least one (chimney swift) is listed as a Bird of Conservation Concern by the US Fish and Wildlife Service. In addition, the forested wetland areas are important wintering habitat for rusty blackbirds, also a BCC-listed species.

- In section 4.2.7 (Aesthetics), the report finds no adverse impact. While we agree that routing the levee under the footprint of the existing asphalt path minimizes some of the visual impact within the park, we are very concerned that the associated alignment of the floodgate at the concrete trail bridge location will tend to trap litter that comes through the storm drain system into the Hume Spring tributary ("East Stream" in the report), as is currently observed behind the floodgate located on the Sunnyside tributary. The Hume Spring tributary upstream of the concrete bridge is steep-banked and/or vegetated along most of its length, difficult to access on foot, and thus land-based clean-ups are unlikely to see success in keeping the area trash-free. Our kayak-based volunteer clean-ups are currently able to remove litter throughout the Hume Spring tributary, but kayak access will no longer be possible should a floodgate be installed at the location pictured in Figure 4-5. A floodgate at this location will definitely lead to the adverse impact of trashy appearance, and a loss of aesthetic value to neighboring residents and park visitors.
- The report maintains in section 4.2.8 (Recreation) that Alternative 5a would have no permanent recreational impact, which we strongly dispute. The Hume Spring tributary (referred to in the report as the "East Stream") is regularly accessed from the Run by canoe and kayak, and paddling in this nearby nature is a treasured outdoor activity for many local residents and visitors, including neighborhood youth who participate in our Nature Explorers And Restorers program. Today, one can easily paddle the course of the stream 200 meters above where the proposed floodgate would be situated, at the location of the concrete trail bridge.
- For all the reasons listed above, we object to the positioning of a floodgate at the location of the present-day concrete bridge, as depicted in Figures 3-17, 4-1, and 4-2, as well as to the notion that streambed impacts are unavoidable, requiring compensatory mitigation as described in Table 4-3. We believe a levee alignment crossing the Hume Spring tributary ("East Stream") farther upstream at or near the existing concrete spillway, as shown in Figure 3-13, is preferable. There may be opportunities to route a floodwall/levee such that it ties into planned development, such as the Cora Kelly School replacement.
- In Section 4.2.6 (Cultural Resources), the Arlington WPCP project (Alternative 4c) is not expected to adversely affect historical resources. We include, attached, a georeferenced map overlay projecting the positions of what are believed to be canal barge wrecks from the Potomac flood of 1889 (apparently hauled up the Run to divert the channel prior to construction of the Washington, Alexandria & Mount Vernon

electric railway), drawn from 1927 aerial imagery. This archaeological resource may still be buried beneath the WPCP and/or the trail in the vicinity of the proposed floodwall construction.

• The study's treatment of environmental justice is cursory. In section 4.2.10 (Environmental Justice), the study notes that Alternative 5a is the only one located in a census tract identified as an EJ community. While the benefit of coastal flood protection is noted in Table 4-2, the adverse EJ impacts of the project – permanent and temporary losses of recreational access, particularly for children in a community with a high proportion of children and youth – are not mentioned.

We have questions about some of the study's underlying assumptions and models, as follows:

- Characterization of the study area around the park lacks sufficient detail to determine if adopted land use plans for the study area were used. There will be an increase in density in this study area, including low and moderate income housing, that is associated with the "Amazon Bump." Please clarify what land use forecasts were used in making assumptions about overall impacts.
- Similarly, there appears to be cursory references to the Four Mile Run Park Master Plan. What effects will the alternatives have on development of the park?
- There appears to be no reference or use of the new Intensity, Duration, Frequency (IDF) Curves now available for the Commonwealth. This data is crucial to accurate flood hazard forecasting. Please affirm that these revised IDF curves were used to evaluate the alternatives.
- We're unable to ascertain the catchments used to model projected flood hazards. Could a map with catchments be provided? Do the calculations take into account hazard mitigation and Green Infrastructure already in place or contemplated? Is there a control limit on the stormwater runoff for the watershed that jurisdictions have adopted, perhaps as part of the TMDL? Has that been factored in?
- For the flood hazard modeling, were the only parameters used the projected SLR? Was flooding due to rainfall intensity, etc. not also modeled in addition to the SLR projections? If not, why not?
- Was tree canopy loss characterized? There is a heat island effect currently in this EJ community.
- Recreational fishing is currently an activity that occurs in the park daily. Please characterize the effect of the alternatives on fishing.

A few additional notes/corrections:

- Dominion Energy is proceeding on plans to remove the power transmission poles (and bases) mentioned in Appendix A page A-5 and Figure A-5.
- At the bottom of page 73, the description should be corrected to reflect that the area south of Four Mile Run is in the City of Alexandria, not in Fairfax County.
- Table 2-9 ought to be amended to reflect that Arlington County has a Four Mile Run Park, directly across the Run from Alexandria's Four Mile Run Park.

Thank you for the opportunity to comment on the Draft Integrated Feasibility Report and Environmental Assessment.

Sincerely,



Kurt Moser President



Approximate outlines of Four Mile Run channel features visible from 1927 aerial photography overlaid on present-day imagery.

250	0	250	500	750	1000 ft

Roach, Andrew (b) (6) USARMY CENAB (U	SA)
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From:	(b) (6)
Sent:	Thursday, June 30, 2022 11:25 AM
То:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Flood wall Belle View area, Alexandria, VA

Hello.

I am writing to oppose the proposed flood wall design as it currently stands. I am a resident owner in the River Towers 21 building and will be greatly affected by this wall.

I am concerned that it may actually cause flooding in our buildings when water is literally walled in, especially so close to our buildings. Water flowing down from Beacon Hill will flow in our direction and flood our land. It seems like avoiding one flood issue is creating a different one.

I am also concerned about the gates and possible evacuation problems for our residents.

Please reconsider the location of the wall for these and various other safety considerations.

I appreciate your time.

Kind regards,



From:	(b) (6)
Sent:	Thursday, June 30, 2022 9:32 AM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Storm Risk Management

Dear Staff of the U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community. However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, including:

- It does not address stormwater flooding, which has already proven to be a significant problem in our area
- It does not address the aesthetic and pragmatic needs of the community and the loss of amenities
- This plan includes destruction of property and will negatively impact the property values of the affected neighborhoods
- The plan would destroy many of natural resources, including trees and wetlands, which naturally mitigate flooding and global warming, and should enhanced, not destroyed
- The plan negatively affects Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County
- The plan does not address how wildlife will traverse the flood wall and levee
- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.



From:	(b) (6)
Sent:	Thursday, June 30, 2022 9:18 AM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Please don't proceed with Alexandria flood wall

Dear Staff of the U.S. Army Corps of Engineers,

I am writing to you about the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study. I deeply appreciate that you are invested in helping prevent flooding to structures in our community. However, I have concerns about the specific proposal in the study for the USACE to build a flood wall, levee, and pumping station in the Alexandria section of Fairfax County, which would directly impact the neighborhoods of New Alexandria, Belle View and River Towers. This plan has many flaws in it, including:

- It does not address stormwater flooding, which has already proven to be a significant problem in our area
- It does not address the aesthetic and pragmatic needs of the community and the loss of amenities
- This plan includes destruction of property and will negatively impact the property values of the affected neighborhoods
- The plan would destroy many of natural resources, including trees and wetlands, which naturally mitigate flooding and global warming, and should enhanced, not destroyed
- The plan negatively affects Dyke Marsh, a sensitive wetland ecosystem, and the protected Resource Protection Area designated by Fairfax County
- The plan does not address how wildlife will traverse the flood wall and levee
- The plan creates noise from the construction and the proposed pumping station, which will negatively affect the quality of life of both residents and wildlife

Instead of the current plan, I hope that you will re-consider other water mitigation options that were proposed earlier by the USACE, including funding additional restoration of Dyke Marsh and elevating the George Washington Memorial Parkway.

Thank you for taking the time to read my letter.

Sincerely,



From:	(b) (6)
Sent:	Thursday, June 30, 2022 5:30 AM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] River Towers Owner feedback

Thank you for hosting the community meeting this month. Although I fully understand the need for a flood mitigation plan, I am deeply concerned

about the proposed plan for four reasons.

- 1. The impact on our property values with this plan.
- 2. The impact on the aesthetic beauty of our property.
- 3. The use of forcible measures

such as eminent domain to obtain property.

4. The appearance that the wealthier properties will be aesthetically preserved while our lower value properties in the community will be disrupted.

#### Property Value

I am already of the belief that our property is intentionally undervalued by Fairfax County because the county government owns several units in Belle View condominiums and therefore their property is assessed at a higher value than River Towers.

With a project of this scope and scale, what are the specific plans to preserve our property value?

#### Aesthetic Beauty

One of our biggest selling points of our property is the beautifully maintained grounds and open views of nature. I have very serious concerns that our property will be less enjoyable due to this project of levee and walls. I don't think it's acceptable not to propose a plan that involves the wall along the banks of the golf course as well as along the east side of GW parkway.

#### Forcible Measures

Eminent domain is a foul process. Forcibly taking people's property even with appropriate compensation is very violating and disruptive to a community.

#### Surrounding communities with higher property value

I would like to see additional plan options that involve the Belle Haven community (wall on the golf course) and the levee placed in front of new Alexandria homes. They flooded in hurricane Isabel, not River Towers.

Thank you for your time and consideration.

Sincerely,

#### (b) (6)

Sent from my Verizon Motorola Smartphone

### Roach, Andrew <sup>(D) (6)</sup> USARMY CENAB (USA)

From: Sent: To: Subject: (b) (6)

Thursday, June 30, 2022 2:57 AM DC-Metro-CSRM-Study

[Non-DoD Source] Re: Comment Response to Proposed NOVA Metro DC coastal storm study

On June 30, 2022 at 2:52 AM (b) (6)

wrote:

I am a resident of the Belle View Community and have lived through many storms including Hurricane Isabel. First, we do not get regular, sustained flooding issues in our community with the exception of Hurricane Isabel which was once in a 100 year event. Even then, the problem we encountered was ground water rising from the creeks that run through our community. I live over on Belle View Boulevard and our area was not as impacted as those buildings on 10th street or the homes in New Alexandria which border the creeks. Trying to compare our community to the Huntington area or Old Town is not fair. We do not have regular flooding problems. Those communities are up against the Potomac river - we are not. Our community is surrounded by wetlands that take the direct impact of Potomac flooding.

The proposed plan for a floodwall at the community of Belle Haven has not been thoroughly or thoughtfully designed for the following reasons:

- The study does not adequately address the immediate need for building such a structure in the Belle Haven area.
- The study does not adequately address why alternate measures for flood control have not been investigated and reviewed why is this the only study being considered to address an imaginary need? Why have alternative, less-intrusive, and perhaps less costly measures not been explored and presented?
- It is not clear how building a six foot flood wall is going to address ground water rising within the community which, in reviewing past flood history, has been the only issue with this community. The Belle Haven area has never been inundated with flood water going over the George Washington Parkway and entering into the community from the Potomac along the route of the proposed wall. Dykes Marsh has time and again captured flood storm water. It is a buffer between our community and the Potomac river.
- Even with anticipated water levels rising due to global warming, it will be Dykes Marsh that will take the direct impact from the Potomac river and perhaps parts of George Washington Parkway not our community. Why does the study put the wall on Belle View Boulevard rather than in Dykes Marsh which is on the river? Why hasn't a study been done to expand Dykes Marsh's capabilities for effective flood control?
- The study does not adequately address why a six foot wall is the only option for flood control or how it will work specifically to control rising water. Where is the evidence that the Potomac river is going to rise to 6 feet in the Belle Haven community? If that is true then the wall should be extended all along the George Washington Parkway from Alexandria down to Mount Vernon.
- The study does not adequately address all of the costs associated to Belle Haven residents for lowered home prices. It also has not factored accurately the costs for building such a structure, especially if there has to be a proposed levee built up like what was done in Huntington. That is a huge amount of money for something that may never be needed.
- This proposal has a huge negative impact on our community and way of life.

- All stakeholders have not been invited or included in the development of this proposal. It is a very narrow look at a non-existent problem. This study was funded by only one source developers with deep pockets who want a certain action to be taken and are paying to have this phony study. But when it comes time for actually paying for the work, it will be U.S. tax payers who will have to foot the bill.
- It is unfair to have outside groups deliver a study without our people the people who live here being part of the discussion from the very inception of the problem.

Why haven't experts been brought in to look at all aspects of the problem? Experts including environmental agencies to determine if a need really exists for the Belle Haven community. This study is too generalizable to the Potomac river as a whole. No evidence has been presented that shows that the river will directly impact Belle Haven community along the route of the proposed wall nor at the levels that the wall is given (6 feet).

From:(b) (6)Sent:Thursday, June 30, 2022 2:52 AMTo:DC-Metro-CSRM-StudySubject:[Non-DoD Source] Comment Response to Proposed NOVA Metro DC coastal storm study

I am a resident of the Belle View Community and have lived through many storms including Hurricane Isabel. First, we do not get regular, sustained flooding issues in our community with the exception of Hurricane Isabel which was one in a 100 year situation. Eventhen, the problem we encountered was ground water rising from the creeks that run through our community. I live over on Belle View Boulevard and our area was not as impacted as those building on 10th street and the homes in New Alexandria which border the creeks. Our community is not like the Huntington area or Old Town both of which are up again the river. Our community is surrounded by wetlands that take the direct impact of Potomac flooding.

The proposed plan for a floodwall at the community of Belle Haven has not been thoroughly or thoughtfully designed for the following reasons:

- The study does not adequately address the immediate need for building such a structure in the Belle Haven area.
- The study does not adequately address why alternate measures for flood control have not been investigated and reviewed why is this the only study being considered to address an imaginary need? Why have alternative, less-intrusive, and perhaps less costly measures not been explored and presented?
- It is not clear how building a six foot flood wall is going to address ground water rising within the community which, in reviewing past flood history, has been the only issue with this community. The Belle Haven area has never been inundated with flood water going over the George Washington Parkway and entering into the community from the Potomac along the route of the proposed wall. Dykes Marsh has time and again captured flood storm water. It is a buffer between our community and the Potomac river.
- Even with anticipated water levels rising due to global warming, it will be Dykes Marsh that will take the direct impact from the Potomac river and perhaps parts of George Washington Parkway not our community. Why does the study put the wall on Belle View Boulevard rather than in Dykes Marsh which is on the river? Why hasn't a study been done to expand Dykes Marsh's capabilities for effective flood control?
- The study does not adequately address why a six foot wall is the only option for flood control or how it will work specifically to control rising water. Where is the evidence that the Potomac river is going to rise to 6 feet in the Belle Haven community? If that is true then the wall should be extended all along the George Washington Parkway from Alexandria down to Mount Vernon.
- The study does not adequately address all of the costs associated to Belle Haven residents for lowered home prices. It also has not factored accurately the costs for building such a structure, especially if there has to be a proposed levee built up like what was done in Huntington. That is a huge amount of money for something that may never be needed.
- This proposal has a huge negative impact on our community and way of life.
- All stakeholders have not been invited or included in the development of this proposal. It is a very narrow look at a non-existent problem. This study was funded by only one source developers with deep pockets who want a certain action to be taken and are paying to have this phony study. But when it comes time for actually paying for the work, it will be U.S. tax payers who will have to foot the bill.
- It is unfair to have outside groups deliver a study without our people the people who live here being part of the discussion from the very inception of the problem.

Why haven't experts been brought in to look at all aspects of the problem? Experts including environmental agencies to determine if a need really exists for the Belle Haven community. This study is too generalizable to the Potomac river as

a whole. No evidence has been presented that shows that the river will directly impact Belle Haven community along the route of the proposed wall nor at the levels that the wall is given (6 feet).

From:	(b) (6)
Sent:	Wednesday, June 29, 2022 9:54 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Belle Haven/Belle View Floodwall Comments

I am concerned with the current proposal for the Belle Haven/Belle View Floodwall in the proposed location that will essentially wall in the current Belle Haven/Belle View community and turn what is currently a rather pleasant, yet affordable, place to live into a place that many (myself included) would never care to live at.

I have read on multiple websites that there was formerly a proposal to build the wall/berm at the current location of the Mount Vernon Trail and place the Mount Vernon Trail atop the structure. It is also my understanding that this plan was rejected due to the need to coordinate with the National Park Service regarding the land/project.

Walling in a neighborhood using land that will be taken through eminent domain when there is land already owned by the public (NPS) across the George Washington Parkway that would result in an aesthetically more agreeable end project that would also allow for repair of the Mount Vernon Trail (which is needed in that area) is a prime example of government (lack of) coordination and (lack of) cooperation.

Even though the cost might appear to be greater, the possibility of combining two projects that need to happen could ultimately result in less waste and more efficiency, and would certainly be better than enclosing a pleasant neighborhood in a fortress. It also seems like putting the flood wall/berm on the eastern side of the George Washington Parkway could also have the potential benefit of preserving at least emergency access to portions of the GW Parkway during a flood event. It seems like a once in a lifetime project of this type should be done right, rather than just getting it done the easiest and cheapest way possible.

Thank you for reading my comments. Sincerely, (b) (6)

From:	(b) (6)
Sent:	Wednesday, June 29, 2022 6:02 PM
To:	(b) (6)
Cc:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Flood Gate Issue and River Tower Condo

Greeting. I am well aware that there were meeting regarding building Flood gates to prevent floods in the area of River Tower Condo and Bell Haven area. I had to say that I wish they would have a better way to do this than tearing down the Basketball Court and the Tennis court behind 6621 Wakefield Drive. I have a disability.

What is wrong with taking another look at the area and perhaps build water drainer pipes and slope near the back of the Basketball and Tennis Court to move the water away from the Condo and Bell Haven area?

I moved to this condo last year from Mount Vernon and I never thought that putting up Flood gate near the condo would ruined what has already been here in a long time. I know there were flood in the past in Bell Haven Condo houses and my

condo is up on the second floor whereas I would not have to worry bout flood getting into my condo.

I wish the Board would have an open meeting regarding this along with the contractors and Alexandria Government if they are involve with concern bout flood on George Washington Parkway and into the City of Alexandria. I know down the road

with Climate Changes, there is a possible of land going underwater in the future.

Another way is to build a tall Wall near the lake/river to prevent the water from raising like they have wall in New Orleans, LA to prevent the city from going under water.

V/r,

(b) (6)

From:	(b) (6)
Sent:	Wednesday, June 29, 2022 5:32 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Belle View Flood Wall

To whom it may concern,

I am a home owner in the Belle View Condos located just off the George Washington Memorial Parkway. I attended the meeting at Belle View Elementary about the proposed flood wall. While I do believe we should look into ways to mitigate flood damage in the area, I do not agree with the current proposed plan. I do not understand why a wall should be built on the Belle View side of the parkway as opposed to the Park Service side of the parkway. My home is in the buildings on Boulevard View and would be right next to the wall. Not only would the proposed wall cause hardship with construction and traffic, it will diminish my property value. I know many of my neighbors feel similarly. If a wall needs to be built it should be done on the other side of the parkway where it will not impede on the lives and properties of those who live alongside it. I do not support the flood wall as proposed.

Thank you, (b) (6)

### Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Wednesday, June 29, 2022 12:39 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Flood Wall at River Towers

Dear USACE:

I am a current resident of River Towers in Alexandria. I am quite concerned with the plan to construct a flood wall, levee, and pumping station on River Towers property.

I bought my condo and have lived here for almost two years. I live in Building ()(G), near where much of the construction will be taking place according to your plans. I purchased here because of the convenience and peaceful environment. Not only will the construction of the flood wall, levee, and pumping station be disruptive, but I am concerned about my and the community's property values being affected. Also the use of eminent domain before publicly considering other alternatives is very concerning.

I am requesting that you all put this plan on hold until other alternatives are consulted. I think this is fair prior to pursuing such a disruptive alternative.

Thank you for your time.



Sent from my iPad

From:(b) (6)Sent:Wednesday, June 29, 2022 9:27 AMTo:(b) (6)Subject:[Non-DoD Source] Belle Haven Floodwall & Levee

Supervisor Stork,

I am a homeowner at <sup>(b) (6)</sup> Wakefield Dr, Apartment (b) (6) I strongly oppose the USACE and OEEC plan to mitigate flooding in the Belle Haven Community. Taking a proposed 30% of the River Towers property would have a negative impact on my property value.

Furthermore, the proposed plan would only address tidal flooding, but not water from storm runoff, which has caused flooding in our community previously. We also have serious safety concerns, as it could affect our ability to evacuate the 6621 and 6631 buildings at River Towers in the event of an emergency and could actually cause flood waters to pool around and inside the River Towers community.

I encourage you to continue to seek alternative means to address flooding in the Belle Haven area.

Thank you.



From:	(b) (6)
Sent:	Tuesday, June 28, 2022 7:33 PM
То:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Flood control plan for River Towers

I would rather abandon my apartment than overlook a pumping station and flood wall. I currently overlook the tennis courts which I understand will disappear under the proposed plan. There must be a better way to handle the problem than destroying all of the amenities and ambiance that has made River Towers a lovely place to live. Please try again to find an acceptable solution. (b) (6)

Sent from my iPhone

# Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Tuesday, June 28, 2022 5:17 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Comment on NOVA Coastal Study
Attachments:	DC Coastal study comment_Jue.pdf

Please see attached.

Very Respectfully,




U.S. Army Corps of Engineers Baltimore District DC-Metro-CSRM-Study@usace.army.mil

28 June 2022

To Whom It May Concern:

I write to voice my concerns with the Metropolitan Washington, District of Columbia Coastal Storm Risk Management Study as presented on 14 June 2022.

The study cites concern that "coastal flooding can endanger lives; prevent access to evacuation routes and critical infrastructure; and cause property and economic damages." If the intent is to identify a long-term solution viable for 50 years or more, a single pre-selected course of action lacks intellectual honest and rigor; limiting options to a floodwall along the western side of the George Washington Parkway seems particularly short-sighted.

Parkway drivers and park-goers east of such a wall would receive no protection, while allowing the G.W. Parkway to flood would cut off a major evacuation route. Any enduring solution must consider the land east of the proposed wall site. While the National Park Service has legal restrictions dating back to the Capper-Cramton Act, those should not include inaction to the point of consigning the parkland to oblivion by deluge – and have not precluded the current North Parkway Rehabilitation project

(<u>https://www.nps.gov/gwmp/learn/management/north-parkway-rehabilitation.htm</u>). Solutions involving NPS land cannot be simply dismissed out of hand.

The targeted residential neighborhoods of River View and New Alexandria are valued for their bucolic nature. Mature trees and river views are major attractions; the neighborhood name is no accident. The easternmost street, Boulevard View, is the most popular pedestrian route for local residents – people divert themselves (and their dogs) from many blocks away to enjoy the view along this street for their walks. The proposed flood wall would eliminate not only the view, but also much of the mature tree life that frames this scenic community. In addition to the actual run of the wall, and maintenance vehicle access lanes, tall trees would be removed to prevent damage – by either falling trees, or root balls. The residents of this community choose to live here, with warnings both prior to purchase and annually from FEMA; we knowingly accept some risk to benefit from the scenery and access. Walling us in against our will is unacceptable, especially while those less willing to accept risk have the option to sell their properties, at historic record prices, to buyers who are willing and witting.

Additionally, there is scant evidence that a wall would prevent more flood damage than it causes. At the 14 June meeting, the USACE team acknowledged that the study considered only river flooding due to rising sea levels and storm surge, while not evaluating water retention in cases of heavy rainfall, stream or sewer flooding, or groundwater flooding.

Any major engineering works project is a major undertaking. It would be unwise, and profligate of taxpayer money, to launch a significant investment that creates new problems

while addressing only narrow pieces of the original problem, especially if the planning begins with artificial self-imposed constraints that ignore alternative options.

As a final note: the National Park Service also protects the Dyke Marsh Wildlife Preserve. Signboards at the preserve entrance decry the loss of wetland over the past century, and highlight the value of such wetland as a stormbreak. The Coastal Study did not consider rebuilding the lost wetland – perhaps that should be examined as an elegant solution to multiple problems, while benefiting all parties.

Very Respectfully,



From:	(b) (6)
Sent:	Tuesday, June 28, 2022 4:47 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Metropolitan Washington, District of Columbia Coastal Storm Risk Management
	Study
Attachments:	4MR Corps Coastal Flood Control Study Comments 6-28-22.docx

#### (b) (6)

Thank you for your work preparing the draft Integrated Feasibility Report and Environmental Assessment (EA) for the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study in the Northern Virginia coastal areas of the Middle Potomac River Watershed. I am attaching my comments and look forward to seeing the final report.



Thank you for your work preparing and releasing for comment the draft Integrated Feasibility Report and Environmental Assessment (EA) for the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study in the Northern Virginia coastal areas of the Middle Potomac River Watershed. I have some comments on the draft, and am acknowledging up front my involvement in the earlier phases of the study (ending 18 months ago) while at MWCOG. These comments are mine and do not reflect the views of MWCOG or any other organization.

My comments include:

• I support continuing action to further develop the two TSP projects at the Arlington County Water Pollution Control Plant and in Belle Haven portion of Fairfax County. However, I request that the Corps consider an additional alternative in Belle Haven.

While I recognize the complications of undertaking a project on federal Park Service land, I encourage the Corps to work with the Park Service to develop an option that would be located primarily on the east side of the George Washington Memorial Parkway. Such an option could be integrated with raising the elevation of the pedestrian-bicycle Mount Vernon Trail along the Parkway. While this would require removal of some trees and adaptation of the motor vehicle entry points to the Belle Haven Marina and Picnic Area and Mount Vernon Trail Parking, it would minimize the disruption to the residential developments west of the Parkway, and protect the Parkway as well as the neighboring community from future flooding. This could be integrated into resiliency plans for the Parkway.

This change would likely increase the community acceptance of this option.

- I also ask the Corps to encourage the Park Service to consider additional flood-protection measures along portions of the George Washington Memorial Parkway that would not be protected from coastal and other flooding by the TSP. These should be incorporated into resiliency planning for the Parkway.
- The proposed levee and floodwall along the Alexandria side of Four Mile Run would provide protection to the environmental justice communities along this stretch of Four Mile Run. This area is identified as an Equity Emphasis Area by MWCOG and the National Capital Regional Transportation Planning Board. Specifically, the Hume Springs and close-by neighborhoods in Arlandria contain a concentration of Central American/Latino and African-American residents and businesses. Alexandria recently completed a small area plan to encourage development and preservation of affordable housing and small businesses in Arlandria. Neighboring Lynhaven, while going through a period of change, has historically been home to mnany African-American households. Alexandria also is spending millions of dollars in stormwater management projects in this area. Protecting the area from coastal, as well as riverine and overland flooding, will be critical to maintaining the cultural viability of the neighborhoods and the success of these community and affordable housing development efforts.

While the report notes that the Four Mile Run levee would be beneficial to this environmental justice community, I did not see how the environmental justice consideration was explicitly

incorporated in the selection of the TSP. The TSP selection appears to be based on economics alone. It should give weight to provision of benefits to the EJ community.

• The proposed location of the Alexandria side levee along the Four Mile Run Park trail offers advantages in using existing open space to construct a levee. However, an alignment along the western edge of Four Mile Run Park, and then tied into flood protection as part of construction of a new Cora Kelly Elementary School, would provide greater environmental benefits while providing the same or better flood control. While not part of the TSP, this alignment is shown in Figure 3-13 on page 98 of the report. The report should more completely include this alignment to better reflect the broader environmental protection the alignment would provide.

For example, this alignment would better maintain the hydrologic link between the upstream wetlands along the East Stream and Four Mile Run (note the Four Mile Run Conservatory has found anadromous fish and a regular presence of birds such as Osprey that feed off of the fish, in this upstream reach). Such an alignment also would avoid creating a barrier at the to the regular water-based trash cleanup along the East Stream; and, while having short-term disruptions to the fields during flood events, would provide more room for floodwaters to spread out along Four Mile Run in the areas of the existing ball fields.

This alignment, as well as the proposed alignment along the current trail, would have to be constructed in a manner that allowed the neighborhoods to continue access to Four Mile Run Park. This could be done by limiting the slope of any levee, and providing for openings (with flood-control closures) at walkways where a floodwall was needed. Such designs could create greater acceptance in nearby communities.

Thanks again for providing the opportunity to comment on the draft Integrated Feasibility Report and Environmental Assessment (EA).



From:	(b) (6)
Sent:	Tuesday, June 28, 2022 2:18 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[URL Verdict: Neutral][Non-DoD Source] Draft Integrated Feasibility Report & Environmental
	Assessment
Attachments:	NOVA Coastal Study - Draft Integrated Feasibility Rpt & Environmental Assessment #12361286
	v1.PDF

Colonel Pinchasin,

On behalf of River Towers Condominium Unit Owners Association, Inc., please see the attached correspondence.

Please let me know if you are unable to open the attachment.

Thank you, Jenifer



Jenifer K. Ellis | Legal Assistant to Marla J. Diaz, Kevin A. Kernan and Nasim J. Saeidi 3190 Fairview Park Drive, Suite 800 | Falls Church, Virginia | 22042-4510 t: (703) 280-9262 | f: (703) 280-8941 [JEllis@wtplaw.com | www.wtplaw.com

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#### RIVER TOWERS CONDOMINIUM UNIT OWNERS ASSOCIATION, INC. 6631 Wakefield Drive, #114

Alexandria, VA 22307

June 28, 2022

Colonel Estee S. Pinchasin U.S. Army Corps of Engineers – Baltimore District <u>DC-Metro-CSRM-Study@usace.army.mil</u> 2 Hopkins Plaza Baltimore, MD 21201

#### Re: NOVA Coastal Study Draft Integrated Feasibility Report and Environmental Assessment

Dear Colonel Pinchasin:

On behalf of the River Towers Condominium Unit Owners Association, Inc., ("Association"), owners, and residents, we write to object to the proposed Draft Integrated Feasibility Report and Environmental Assessment ("TSP") and to ask not only that the public comment period be extended, but that USACE and MWCOG reconsider several problematic and artificial limitations currently undermining the proposed plan.

We have reviewed the plan and attended the public presentations of the USACE. Generally, we encourage efforts to address potential flooding issues that may impact our Condominium, but the proposed plan fails to consider alternatives that would be more viable and, therefore, is not a good solution.

We have several issues that we wish to raise before a plan is implemented to address flooding issues. The TSP is based on the concession that the National Park Service (NPS) will have no contribution, either economic nor material, in the implementation of the flood abate problem. We believe that the lack of involvement of NPS is shortsighted and suggests a lack of considered thought on the problem, as well as being contrary to the overall public good. We

believe that, given the location of the NPS's property along the Potomac, the NPS must be involved, if not financially, then materially in contributing to the resolution of future flooding issues.

Similarly, the TSP was prepared without taking into consideration alternatives that would involve the District of Columbia and counties on the Maryland side of the Potomac. The public has not been given an explanation as to why these jurisdictions opted out, but as a flooding Potomac would impact all these areas, a cooperative effort between these jurisdictions is critical to finding a better plan for flood abatement. For Colonel Estee S. Pinchasin U.S. Army Corps of Engineers – Baltimore District June 28, 2022 Page 2

example, USACE informed the public meeting that a deployable flood wall across the Potomac was discarded as an option because of the lack of participation from D.C. and Maryland counties. Trying to address this issue piece-meal, as the current TSP proposes, places an unnecessary and unreasonable burden on one side of the river and fails to resolve the greater flooding issue.

We also question the completeness of the study since the focus of the flood problem seems to concentrate exclusively on flooding from storm surge and does not address flooding issues from water runoff. In fact, we believe, that not accounting for runoff makes the TSP ineffective in a complete resolution of the problem.

Additionally, the TSP solution is primarily based on constructing a 6 foot wall which would have several adverse environmental affects which are not adequately addressed. We also believe the life cycle cost of the wall is materially underestimated. The cost estimate for the easement and structural relocations also seems to be significantly undervalued. The construction of a wall and levee would be at least a 30 foot wide taking of private property that would eliminate amenities on those properties, restrictive the existing view, and significant diminish the property values involved, including the many owners of River Towers Condominium. The TSP fails to take into consideration a real cost of the proposed plan. Last and not least, the proposed wall and levee structures would turn a bucolic landscape into a closed in ghetto with material environmental and social degradation of a currently beautiful part of Fairfax County. Such a taking would constitute a valuation of several times the projected easement cost and, we believe, make the project uneconomic.

While we appreciate the effort to consider solutions to potential future flood issues, we are convinced that the proposed TSP is not a workable or reasonable plan. Further research of alternatives, public input, and coordination with both the NPS and neighboring jurisdictions are needed before a plan can be finalized.

Thank you in advance for your consideration of our comments and for your efforts to find a real solution to the flood abatement issues on the Potomac. With regards, we are

Very truly yours,

Directors of the Board, River Towers Condominium Unit Owners Association, Inc. Colonel Estee S. Pinchasin U.S. Army Corps of Engineers – Baltimore District June 28, 2022 Page 3

cc: Christian Dorsey, Chair Senator George Barker, Committee Member Supervisor Penelope Gross, Committee Member Supervisor Rodney Lusk, Committee Member Supervisor Jeff McKay, Committee Member Supervisor Walter Alcorn, Alternate Committee Member Supervisor Daniel Storck, Alternate Committee Member Supervisor James Walkinshaw, Alternate Committee Member Metropolitan Washington Council of Governments 777 North Capitol Street NE, Suite 300 Washington, DC 20002

Bryan Hill, County Executive Fairfax County Virginia 12000 Government Center Parkway Fairfax, VA 22035

From:	(b) (6)
Sent:	Tuesday, June 28, 2022 12:49 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[URL Verdict: Neutral][Non-DoD Source] letter with comments on Proposed Coastal Storm Risk
	Mitigation
Attachments:	S10.160.3.122062811020.pdf

#### Good afternoon. Please see the attached letter to record for public comment.

Respectfully yours in public service,

Nick Rinehart Land Use & Development Liaison Supervisor Dan Storck Mount Vernon District Fairfax County Board of Supervisors 2511 Parkers Lane Mount Vernon, VA 22306 O: 703-780-7518





# For the latest updates on Coronavirus (COVID-19), visit the <u>County's webpage</u> and <u>subscribe</u> <u>to our newsletter</u>.



Please be advised, unless otherwise requested, that your email address will be added to our Mount Vernon District Advisor (newsletter) distribution list. Additionally, correspondence with Supervisors is subject to the Virginia Freedom of Information Act (FOIA). This means that your correspondence may be made public if someone requests it. Only a few matters are exempt from disclosure, including personnel information about individual employees.

From: (D) (6) Sent: Tuesday, June 28, 2022 11:03 AM

## то:<mark>(b) (6)</mark>

Subject: Message from 10.160.3.142



MOUNT VERNON CHETHICT OFFICE RECEIVED IUN 2 1 2022

Dan Storck Mount Vernon Governmental Center 2511 Parkers Lane Mount Vernon, VA 22306

#### Dear Mr. Storck,

I have been closely following the discussions about flooding around New Alexandria for years, and I attended the event a few days ago at the Belleview elementary school. There are clearly no solutions that will please everyone. Expecting the Park Service to approve the creation of a gigantic berm on its property is both naïve and irresponsible. The Park Service has a stated mission, and a berm of requisite size would destroy a beautiful place that is a refuge to thousands of people in Fairfax County and beyond. The "how dare they" attitude voiced by some people at the meeting is a non-starter that would require the approval of a Cabinet Secretary even after years of litigation. Doing nothing has an appeal. Voiced political support coupled with slow-rolling all follow-on actions so that nothing ever materializes also has an appeal, but offers no solution. So, what to do? A logical, explainable, and defensible position might be one that unfortunately affects a small number of residents adversely while greatly benefiting a far greater number. I think that's where I come down, so I offer the following suggestion as a possibility to ponder.

The commitment to build a wall of a requisite height on the west side of the parkway is ratified. This would have a potentially devastating impact on approximately 15 homes, the fronts of which would face the wall. Although drastic, the best long-term solution might be to raze those homes, build the wall, and possibly do something attractive with the freed-up land not needed for the wall itself. If no wall is built at all, those residents on Boulevard View Drive and neighboring streets will otherwise see constantly increasing threats of flooding from ocean rising and storms, and they will find that their properties are unsellable and uninsurable. The devastating impact on property values in the whole area is obvious. The wall, while being devastating to those few who lose their houses, would be a huge and permanent benefit to everyone else. Obviously, a few residents would have to move, and that is a burden not to be taken lightly, but they would be monetarily made whole. Hence, the greater good solution.

Sincerely yours,



From:	(b) (6)
Sent:	Monday, June 27, 2022 10:23 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Belle Haven Floodwall and Levee

June 27, 2022 USACE DC-Metro-CSRM-Study@usace.army.mil

A meeting was held at River Towers to find out more about the plan proposed by the U.S. Army Corp of Engineers.

Their currently proposed plan would involve taking about 30% of our property by eminent domain, and would involve the construction of a flood wall, levee, and pumping station on what is now our property. It would severely impact our view as well as our access to amenities, including the tennis and basketball courts, playground, picnic grove, parking lots, and garden. It would involve noisy and invasive construction adjacent to all three buildings, and negatively affect our property values. Furthermore, the proposed plan would only address tidal flooding, but not water from storm runoff, which has serious safety concerns, as it could affect our ability to evacuate the 6621 and 6631 buildings in the event of an emergency and could actually cause flood waters to pool around the inside of River Towers.

For these reasons mentioned above, the River Towers Condominium Owners Association Board of Directors opposes the proposed plan.

Thank you for reading this letter, please do not follow through on this plan.

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	-		•

From:	(b) (6)
Sent:	Monday, June 27, 2022 7:13 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Belleview Coastal Study

Categories: Green Category

I attended the session a few weeks back on the Belle-view Coastal Study. We had a lot of residents upset that the floor wall was not going to be on National Park land. I live on 14<sup>th</sup> street and lived here for a bit now. I want the floor wall and I hope US Army Corps of Engineer will pursue the matter despite the negative remarks on the study. I want to live in a future where I don't have to worry about floods.

One last comments, there are about 5,000 or so residents in Belleview area. The session got about 200 residents (who I assume were against the plan). That's not a whole lot of folks in the grand scheme of things.

So please proceed and protect us from floods!

#### (b) (6)

From:	(b) (6)
Sent:	Monday, June 27, 2022 6:56 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] DC Metro CSRM Study Fairfax County Flood Wall

June 27, 2022

Army Corp of Engineers

I am writing to you about the Resilient Fairfax Plan. I would like to comment on the proposal by the Army Corps of Engineers (ACE) to build a flood wall around Belle View and River Towers. While I deeply appreciate the resolve of Fairfax County to mitigate potential flooding in our neighborhoods, I am deeply concerned about the specific plan proposed by ACE. This plan has many flaws in it including:

- It does not address stormwater flooding, which has already proven to be a problem in our area.
- Serious safety concerns, as it could affect the ability to evacuate the 6621 and 6631 buildings in the event of an emergency.
  - It does not address the aesthetic and pragmatic needs of the community and the loss of amenities.
  - The destruction of the property and property values of our neighborhoods
  - Destruction of natural resources, including trees and wetlands, which naturally mitigate flooding and global warming, and should enhanced, not destroyed
  - How the plan will affect Dyke Marsh and the protected Resource Protection Area designated by Fairfax County.
  - How wildlife will traverse the flood wall and levee.
  - How the noise from the construction and the proposed pumping station will affect the quality
    of life of residents and wildlife.
  - The effect of destruction on a historic community that should preserved.

Thank you for your consideration,





From:	(b) (6)
Sent:	Monday, June 27, 2022 2:57 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] River Towers
Attachments:	USACE Letter .docx

Hello,

Please see attached.

Tha	nks,	
(b)	(6)	

June 27<sup>th</sup>, 2022

Dear USACE,

I am writing to you about the Resilient Fairfax Plan. I would like to comment on the proposal by the Army Corps of Engineers (ACE) to build a flood wall around Belle View and River Towers.

While I appreciate the resolve of Fairfax County to mitigate potential flooding in our neighborhoods, I am deeply concerned about the specific plan proposed by ACE. This plan has many flaws in it including:

- It does not address stormwater flooding, which has already proven to be a problem in our area.
- It does not address the aesthetic and pragmatic needs of the community and the loss of amenities.
- The destruction of the property and property values of our neighborhoods.
- Destruction of natural resources, including trees and wetlands, which naturally mitigate flooding and global warming, and should be enhanced, not destroyed.
- How the plan will affect Dyke Marsh and the protected Resource Protection Area designated by Fairfax County.
- How wildlife will traverse the flood wall and levee.
- How the noise from the construction and the proposed pumping station will affect the quality of life of residents and wildlife.
- The effect of destruction on a historic community that should preserved.

We try to be aware of what's taking place in our neighborhood and we feel like this is a topic that just came to our attention in the last few weeks, it's too huge of a topic to not have better communication with the property owners while trying to do what's best to address the problem with at little disruption to everyone concerned including our wildlife which is thriving at River Towers and the surrounding neighborhoods.

Thanks,





Hello,

Please review the attached letter.

We believe there needs to be more community involvement and less intrusion to our community.

We know there is a problem but we don't think the current recommendation is a practical solution.

Thanks for your consideration.



June 27<sup>th</sup>, 2022

Dear USACE,

I am writing to you about the Resilient Fairfax Plan. I would like to comment on the proposal by the Army Corps of Engineers (ACE) to build a flood wall around Belle View and River Towers.

While I appreciate the resolve of Fairfax County to mitigate potential flooding in our neighborhoods, I am deeply concerned about the specific plan proposed by ACE. This plan has many flaws in it including:

- It does not address stormwater flooding, which has already proven to be a problem in our area.
- It does not address the aesthetic and pragmatic needs of the community and the loss of amenities.
- The destruction of the property and property values of our neighborhoods.
- Destruction of natural resources, including trees and wetlands, which naturally mitigate flooding and global warming, and should be enhanced, not destroyed.
- How the plan will affect Dyke Marsh and the protected Resource Protection Area designated by Fairfax County.
- How wildlife will traverse the flood wall and levee.
- How the noise from the construction and the proposed pumping station will affect the quality of life of residents and wildlife.
- The effect of destruction on a historic community that should preserved.

We try to be aware of what's taking place in our neighborhood and we feel like this is a topic that just came to our attention in the last few weeks, it's too huge of a topic to not have better communication with the property owners while trying to do what's best to address the problem with at little disruption to everyone concerned including our wildlife which is thriving at River Towers and the surrounding neighborhoods.

Thanks,



From:	(b) (6)
Sent:	Monday, June 27, 2022 2:26 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] NOVA Coastal Study-River Towers

Afternoon,

I am an owner of a unit at (b) (6)

I am opposed to the plans presented by USACE and MWCOG for the Belle View area.

First and foremost I am opposed to using private land when there is public land available. Our community will lose about 30% of their land, which is unacceptable, when there is public land available on which to build to prevent flooding. I find the idea private land to be used instead of public land an abuse of government on private citizens.

Again, I oppose this plan and plan to take the necessary actions to prevent this proposal from being enacted.



From:	(b) (6)
Sent:	Monday, June 27, 2022 2:03 PM
To:	(b) (6) DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] COE study on Flood Walls for the MV district Belle View area
Attachments:	Flood Walls resolution and cover letter and info sheet 6-27-2022.pdf
Importance:	High

Please see the MVCCA resolution and data sheet attached. We noticed that the COE moved the comment period to July 31, that is still not adequate. As we understand it they have also failed to communicate with the businesses and the national park service.

We are also very concerned over the issue of eminent domain which the COE indicates that the citizens of Fairfax County will have to pay for.

Regards,





# The Mount Vernon Council of Citizens Associations, Inc.P.O. Box 203, Mount Vernon, VA 22121-9998http://www.mvcca.org

June 27, 2022

Dear Supervisor Storck, Chairman McKay, and the Corp of Engineers

Subject: COE Proposed Flood Walls and Pump Station Resolution (Board 2022-01)

The MVCCA voted on June 22, 2022, to support the concerns of the communities that will be seriously impacted by the proposed COE's flood walls and pump station. Our resolution is attached and outlines the concerns.

Furthermore, we learned after our General Council meeting that the COE, at their 6-16-2022 virtual meeting, stated that the pumping station they intend to put on River Towers property would only be working when there are storm surges. And that they intended to shut down the pre-existing pump station and tide gates that mange the water in the canals in this community area. See attachment 2 for the full details. Their removal would be catastrophic for the communities.

We strongly request that you stop the COE from moving forward and that you ensure they work with the impacted communities, the National Park Service and commercial businesses before they go any further with their ill-conceived planning.



Attached: 1. MVCCA Resolution -- Flood Wall Impacting the residential areas of Belleview and River Towers Condominiums, New Alexandria and River View Single Family residential communities and the commercial properties on Belle Haven Rd (Board 2022-01) 2. Info sheet on Tide Gates functionality and purpose.

#### Attachment 1

MVCCA Resolution -- Flood Wall Impacting the residential areas of Belleview and River Towers Condominiums, New Alexandria and River View Single Family residential communities and the commercial properties on Belle Haven Rd (Board 2022-01)

WHEREAS, the Army Corps of Engineers (COE) and the Washington Metropolitan Council of Governments(WMCOG) has proposed a Flood Wall on private property in New Alexandria, River View, Belle View Condominium, and River Towers Condominium; and along the commercial properties on Belle Haven Rd and

WHEREAS, the COE and WMCOG failed to notify the affected homeowners and business owners ahead of their report and failed to invite the commercial owners to the in-person meeting held on June 14; and

WHEREAS, the COG chose their flood wall plan without citizen input, and, further, set the comment period deadline for June 30; and

WHEREAS, after the COE in person meeting on June 14, 2022 with citizens/home owners, county staff, Supervisor Storck plus representatives for our state elected officials and Delegate Paul Krizek the COE agreed to provide more details of their decision making process and alternate plans they discarded, plus look into how they can extend the comment period deadline.

THEREFORE be it resolved, the MVCCA demands true community engagement and full disclosure by the COE, to include a new presentation of details and alternate plans for the residential areas and commercial areas; and

THEREFORE be it resolved, the MVCCA demands a several month extension for the comment period.

Approved June 22, 2022, at the MVCCA General Council Meeting

#### Attachment 2

#### Purpose and Function of the New Alexandria Pump Station and Tide Gate

New Alexandria has two unique stormwater facilities designed to protect the community from tidal flooding: the New Alexandria Stormwater Pumping Station and the New Alexandria tide gate. Should strong northeasterly winds or a tidal surge (associated with a tropical storm or hurricane) cause water levels in the Potomac River to increase above the highest normal tide elevations expected in a typical month, these two facilities were designed to mitigate flooding in this community. Before these facilities were installed, two tidal creeks connected the New Alexandria community <u>directly</u> to the Potomac River. Most of the neighborhood still lies in the Potomac's 100-year floodplain, but protection is now provided for the less extreme tidal flooding events.

<u>The Pump Station</u>: The tidal creek in the western part of the community, which runs along 13<sup>th</sup> street, now meets a closed gate at the pump station, instead of continuing up into the New Alexandria neighborhood. This creek rises and falls with the tide and cannot move past the pump station, as long as the tide elevation remains below 7.5 ft. Any rain which falls in the 50-acre watershed upstream, is piped underground into a wet well inside the pump station, then pumped out into the 13<sup>th</sup> street channel

The Tide Gate: Approximately 1/10 mile east, the eastern channel, which still runs under I street into the community between Woodhaven Road and 10<sup>th</sup> Avenue, has two 4'x8' cast iron sluice gates which close and isolate the upstream side of I street from the tidal creek, and hence, the Potomac. The two sluice gates remain open at all times unless the water surface elevation on the downstream side of the gate structure exceeds 3.5ft, which is several inches higher than the highest expected tide in any given month. Once the sensor on the downstream side of the gate measures an elevation over 3.5ft, the gates close and will not open unless the sensor on the upstream side of the gate detects a level that is 0.7ft (8.5 inches) greater than the downstream level. That difference causes the gates to open long enough for the water surface elevation upstream and downstream to equalize, then the gates close again. Because there are no pumps at the tide gate, should severe rainfall ever occur at the same time an abnormally high tide comes in, the elevations upstream of the gate could approach the same elevation as is being experienced in the Potomac. Fortunately, these two conditions do not often occur simultaneously. The top of the wall at this facility is at elevation 8.0ft, so like the pump station, it can only protect up to that elevation. (Case in point: In 2003, the tidal surge associated with Hurricane Isabel topped this wall by 1.5ft flooding streets and numerous houses.)

The most important thing to know about this community is that the flood event used to create FEMA's floodplain map (with a flood elevation of 11.0ft) was the **1% chance tidal surge which moves up the Potomac**, not the 1% fluvial flow down the Potomac (i.e. from West Virginia down to DC). Simply put, residents need to pay particular attention whenever hurricanes or tropical storms approach the east coast and especially when any tidal surges are being forecast for the Potomac River. Those are the storms to watch.

Sign up for FAIRFAX ALERTS at <u>http://www.fairfaxcounty.gov/alerts/</u> and when doing so, make sure you request weather alerts tailored to your area.

DTL- 04/17/15 (Rev 04/29/15 & 5/11/15)

#### Roach, Andrew <sup>(D) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Monday, June 27, 2022 11:51 AM
To:	DC-Metro-CSRM-Study; dan.storck@fairfaxcounty.gov
Subject:	[Non-DoD Source] Rivertowers/Belle View Community Proposed Flood Plan

As a 20 year resident at Rivertowers Condominium in the Belle View Area of Fairfax County, I AM AGAINST THE USACE CURRENT ENVIRONMENTAL PROPOSED PLAN OF A FLOOD WALL AND LEVEE ON OUR PROPERTY.

Our 26 acre property is unique in Fairfax County where land is at a minimum. There is no other condominium property with the stunning views, acres, garden area, picnic grove and grounds, marsh area and beautiful groves of trees and walkways. To invoke Eminent Domain for approximately 30% of our beautiful landscape IS UNACCEPTABLE! Our grounds are a crowning jewel for our property! Have you or any of your staff even personally come over to survey the area?? Or is it just computer outlines/surveys?!

The value of our properties are directly tied to the beautiful grounds that currently exist and have since 1963. Fairfax County is a very expensive place to live and taking steps that would/could devalue our properties is a crime. I am aware of only one (1) serious incident of flooding in my 20 years here...Hurricane Isabel....which DID NOT affect our residences. However...the garden apartments in Belle View were deeply affected....why not concentrate in that area of properties that does not have the unobstructed acreage and views that exist on the Rivertowers property...and where the flooding did indeed occur?

Certainly there are other environmental options rather than invasive concrete buildings, destroying landscaping and property values.

SAVE RIVERTOWERS! I OPPOSE THE CURRENT USACE PROPOSED PLAN!



#### Roach, Andrew <sup>(D) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Monday, June 27, 2022 11:47 AM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] omment on TSP

I have reviewed the plan and attended the public presentations of the USACE. I have several issues that we wish to raise before the TSP is implemented.

The TSP is based on the concession that the National Park Service (NPS) will have no contribution, either economic nor material, in the implementation of the Flood abate problem. While the position of the has not been explained, there has been a comment by the USACE officials that NPS does not see their involvement in the Flood Abatement as part of their mission and of no concern to the NPS. We believe that the lack of involvement of NPS is unfounded, contrary to the Public Good, impediment to access, and adverse to an optimum solution. We believe that the NPS must be involved, if not financially, then materially in contributing to the resolution.

I question the completeness of the study since the focus of the flood problem seems to concentrate exclusively on flooding from storm surge and does not address flooding issues from water runoff. In fact, we believe, that not accounting for runoff makes the TSP ineffective in a complete resolution of the problem.

Additionally, the TSP solution is primarily based on constructing a 6' wall which would have several adverse environmental affects which are not adequately addressed. I also believe the life cycle cost of the wall is materially underestimated. The cost estimate for the easement and structural relocations also seems to be significantly undervalued. The construction of a wall and levee is not just an easement. These structures appear to be a taking of real property and therefore would require a much higher valuation. The wall and levee structures would turn a bucolic landscape into a closed in ghetto with material environmental and social degradation. Such a taking would constitute a valuation of several times the projected easement cost and, we believe, make the project uneconomic.

Sincerely (b) (6)

From:(b) (6)Sent:Monday, June 27, 2022 11:03 AMTo:DC-Metro-CSRM-StudySubject:[URL Verdict: Neutral][Non-DoD Source] FW: levee

Good morning,

Please see the below comments from (D) (6) that were forwarded to our office, in regards to the proposed floodwall and levee in the Belle Haven neighborhood (TSP Alternate 8)

Thanks.

Respectfully yours in public service,

Nick Rinehart Land Use & Development Liaison Supervisor Dan Storck Mount Vernon District Fairfax County Board of Supervisors 2511 Parkers Lane Mount Vernon, VA 22306 O: 703-780-7518





https://www.fxva.com/southcounty/

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From: Storck, Dan(D) (6) Sent: Saturday, June 25, 2022 4:22 PM



Hi (b) (6

Thank you for your comments. I know that we all agree that something needs to be done and this is not it. Will keep working with everyone until we get one.

Respectfully yours in public service,

Dan Storck Supervisor Mount Vernon District 2511 Parkers Lane Alexandria, VA 22306 Main: 703-780-7518 www.fairfaxcounty.gov/MountVernon

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From: (b) (6)
Sent: Saturday, June 25, 2022 7:43 AM
To: Storck, Dan (b) (6)
Subject: levee

Dear Supervisor Storch,

Thank you for defending us here in Belle View-and River Towers, in regard to the proposed levee. I believe the engineers are about to make a mistake, and an ugly one at that. I am reminded of the ancient saying from down home:

Beauty is but skin deep, and ugly is to the bone. Beauty will fade away, but ugly will hold its own.

This ugliness proposed is surely needed; it just needs to be placed a few hundred feet to the east.

Here is the note I sent to the Corps of Engineers:

For the Engineers:

I have not read the various documents pertaining to the levee at Belle-View. I doubt I would understand the technical points. I am certainly not capable of commenting on them.

But looking at the aerial photos, there is one obvious question: Why is the levee on the west side of the Parkway? It would seem foolish to abandon the 4-lane parkway to flooding when it might be saved by moving the levee a few hundred feet to the east. In fact, when I heard mention of a levee, my first thought was a seawall structure running right along the banks of the river.

As for River Towers itself, it should be noted that during Isabel many years ago, the flooding reached almost to the front and back door of building 41, but it came up the street from the east, and from the west via our sludgy little canal. None of it came from the marsh behind the buildings on the south. Although no deterrent is needed in that area, the proposal places a levee and pumping station there, destroying the tennis courts and picnic area.

Our beloved buildings are the epitome of function, not elegance; the majesty of RT is our grounds. Anything that detracts from their natural beauty is an insult.

Our grounds are lovely in every direction but the marsh is unique. After a day of being functional at work and coming home to functional architecture, a few minutes standing on the bank of the marsh can provide a wonderful moment of mind restoration. Having to view our marsh over a levee and pumping station in the foreground would be like viewing an ancient, magnificent cathedral with a sleazy hot-dog stand on the front lawn.

I am certainly in favor of the levee to prevent flooding, but **put the thing where it belongs** on the other side of the parkway.

(b) (6)



From:	(b) (6)
Sent:	Monday, June 27, 2022 10:08 AM
То:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Belle Haven Floodwall and Levee

To Whom This May Concern,

I am a resident of the River Towers Condominiums. I am in opposition to the proposed plan for the construction of the Belle Haven Floodwall and Levee. I believe other approaches can be agreed upon that better meet the needs of our community. This plan would have an all around negative effect on our community and the preservation of the Dyke Marsh Wildlife Preserve during the construction and after. The impact on the residents, Human and our Wildlife, will have devastating and lasting effects. There are other plans out there that will better fit the needs of this area. Please take this into consideration when making a decision to permanently disrupt this beautiful area.

Thank You, (b) (6) Sent from my iPhone

## Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Sunday, June 26, 2022 2:49 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] DC Metro CSRM Study

This a comment regarding the proposed flood control project METROPOLITAN WASHINGTON, DISTRICT OF COLUMBIA COASTAL STORM RISK MANAGEMENT FEASIBILITY STUDY, specifically the segment of protect in the New Alexandria area (Belle Haven) in Fairfax County, VA.

Rather than build the proposed flood wall and levee, it would be better to raise the level of the George Washington Memorial Parkway and part of Belle Haven Road and have them function as a levee. This would better integrate with the community and eliminate the need for flood gates. It would also not require the closure of the Parkway during storms.



From:	(b) (6)
Sent:	Saturday, June 25, 2022 9:07 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Comment on Belle Haven Flood Mitigation Proposal
Attachments:	USACE flood mitigation letter.docx



June 25, 2022

To: U.S. Army Corps of Engineers (USACE)

Regarding: The proposed flood mitigation plan, Alternative 8: 'Belle Haven Floodwall and Levee'

I am a long-time resident of the River Towers Condominium, in which the current flood mitigation plan proposes walls, levees, and a pumping station. In this letter I speak strictly for myself; I have not consulted with the River Towers Board of Directors, which has issued its own opinion.

I vehemently oppose the USACE plan because it lacks essential details. I attended both the USACE meeting in Belle View Elementary School on June 14, the virtual meeting held June 16, and I have reviewed the online documentation. The key questions I have had are how high and how wide the wall would be that would cut through River Towers, and what would happen to the River Towers property on the other side of the wall. At the meetings USACE representatives openly contradicted each other, saying at times that the wall in River Towers property would be 2 feet, 3 feet, or 6 feet high. None would say how wide the wall would be. At times USACE representatives stated that the River Towers property behind the wall would be taken; at other times representatives said the property would remain with River Towers. The online documentation does not provide conclusive answers either.

This confusion and lack of detail are inexcusable. They cast doubt on the professionalism of the USACE and destroy confidence and trust. No sane River Towers resident will support giving the USACE a carte blanche to take, build, or destroy whatever it wants on River Towers property. Our property and our way of life are at stake.

Please rescind this proposal.

I welcome a detailed and serious proposal that would allow River Towers residents to assess the impact of the project and that would rebuild confidence in the USACE.





June 25, 2022

To: U.S. Army Corps of Engineers (USACE)

Regarding: The proposed flood mitigation plan, Alternative 8: 'Belle Haven Floodwall and Levee'

I am a long-time resident of the River Towers Condominium, in which the current flood mitigation plan proposes walls, levees, and a pumping station. In this letter I speak strictly for myself; I have not consulted with the River Towers Board of Directors, which has issued its own opinion.

I vehemently oppose the USACE plan because it lacks essential details. I attended both the USACE meeting in Belle View Elementary School on June 14, the virtual meeting held June 16, and I have reviewed the online documentation. The key questions I have had are how high and how wide the wall would be that would cut through River Towers, and what would happen to the River Towers property on the other side of the wall. At the meetings USACE representatives openly contradicted each other, saying at times that the wall in River Towers property would be 2 feet, 3 feet, or 6 feet high. None would say how wide the wall would be. At times USACE representatives stated that the River Towers property behind the wall would be taken; at other times representatives said the property would remain with River Towers. The online documentation does not provide conclusive answers either.

This confusion and lack of detail are inexcusable. They cast doubt on the professionalism of the USACE and destroy confidence and trust. No sane River Towers resident will support giving the USACE a carte blanche to take, build, or destroy whatever it wants on River Towers property. Our property and our way of life are at stake.

Please rescind this proposal.

I welcome a detailed and serious proposal that would allow River Towers residents to assess the impact of the project and that would rebuild confidence in the USACE.


From:	(b) (6)
Sent:	Saturday, June 25, 2022 6:11 PM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] In Opposition to the proposed Belle Haven Levee and Floodwall

To Whom It May Concern:

I am a resident of River Towers Condos, and I write today to express my strong opposition to the proposed Belle Haven Levee and Flood Wall proposed by the USACE and the Fairfax County's OEEC. While the threat of climate change to coastal communities is undeniable and should be appropriately addressed, I disagree in the boldest terms with the currently proposed plan due to the severely negative impact the project would impose upon myself, my neighbors, and the security of the established wetland habitat of Dyke Marsh.

I object for the following reasons:

1) This proposal focuses on coastal flooding when historically any issues in the Belle View area of Fairfax County have been the result of storm runoff. The proposal does not make clear why a coastal wall is not closer to the actual coast, which is on federal property overseen by the Department of the Interior.

2) This proposal seems to create additional issues of flood waters pooling around the existing residential buildings should storm runoff occur since a six to seven foot high wall will block and prevent the natural absorption back into the marsh wetlands.

3) By constructing the wall, levee, and pumping station as proposed, no emergency service consideration for the residents in the adjacent buildings has been addressed and would be seriously impacted by these planned obstructions. There are safety concerns, particularly for the ability for emergency services to access the residents and for safe evacuations should needs arise.

4) Your current proposal would take a third of the property currently held jointly by the condo owners of River Towers in order to construct a floodwall, levee, and pumping station. We would lose valuable amenities and land in a challenging market. Additionally, such construction would negatively affect our property values -- a perpetual effect never considered in eminent domain compensations (which, it should be noted, are not addressed in the proposal).

5) Among the amenities lost would be considerable green space. The residents at River Towers are dedicated stewards of the natural wetlands of Dyke Marsh. For myself and many others, the loss of our green space would be the destruction of reason for living here. Green spaces should be preserved and protected, not walled over.

6) Our corner of the Marsh is home to vast species of migrating birds, mammals experiencing rapid habitat loss due to commercial and residential expansion, and reptiles and amphibians -- including several species of breeding turtles. Your proposal has clearly not done sufficient study into the impact altering the natural habitat for the wildlife of the affected region. The proposal neither seems to adequately address the damage caused by construction and maintenance measures. Friends of Dyke Marsh and Northern Virginia Conservation Trust have been alerted.

Fairfax County Board District Supervisor Dan Storck has also expressed his objections to the plan, for which I am truly grateful.

I trust the USACE will reconsider the current proposal and provide stronger alternatives than the appropriation of my property and the destruction of the current natural habitat in the Belle View neighborhood.

With thanks,







### Hi (b) (6)

Thank you for your comments and it is honor to represent you. As you know, the plan relating to the floodwall is managed by the U.S. Army Corps of Engineers (USACE), and where comments need to go. I have copied them here, but to ensure your comments are received (if you haven't already), please send them, and I recommend your friends and neighbors do the same, directly to the USACE email address at <u>DC-Metro-CSRM-Study@usace.army.mil</u>.

Respectfully yours in public service,

Dan Storck Supervisor Mount Vernon District 2511 Parkers Lane Alexandria, VA 22306 Main: 703-780-7518 www.fairfaxcounty.gov/MountVernon

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Sent: Friday, June 24, 2022 3:05 PM To: (b) (6)

Subject: USACE Tentatively Selected Plan - Alternative 8

(b)(c) – Thank you for visiting the two meetings last week that were held to provide info on the USACE feasibility study and tentatively selected plan.

I am writing to STRONGLY OPPOSE the tentatively selected plan as outlined by the USACE on June 14, 2022 at our neighborhood briefing.

I am a resident/owner at River Towers Condominiums. I believe there are better alternatives to the tentatively selected plan.

I also believe that what is essentially a two-week comment period is not sufficient to allow area residents time to study and contemplate the proposed tentatively selected plan.

I have many objections to this idea. I also believe it would be more beneficial for the USACE to study an option to build floodwalls, levees and other stormwater and rain drainage mitigation efforts on the EAST side of the GW Parkway, in areas such as those owned and managed by the National Park Service.

Thank you for your time and attention.

(b) (6)

Good to see you!



your environmental responsibility before printing this e-mail & any documents.

From:	(b) (6)
Sent:	Saturday, June 25, 2022 7:41 AM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Levee

For the Engineers:

I have not read the various documents pertaining to the levee at Belle-View. I doubt I would understand the technical points. I am certainly not capable of commenting on them.

But looking at the aerial photos, there is one obvious question: Why is the levee on the west side of the Parkway? It would seem foolish to abandon the 4-lane parkway to flooding when it might be saved by moving the levee a few hundred feet to the east. In fact, when I heard mention of a levee, my first thought was a seawall structure running right along the banks of the river.

As for River Towers itself, it should be noted that during Isabel many years ago, the flooding reached almost to the front and back door of building 41, but it came up the street from the east, and from the west via our sludgy little canal. None of it came from the marsh behind the buildings on the south. Although no deterrent is needed in that area, the proposal places a levee and pumping station there, destroying the tennis courts and picnic area.

Our beloved buildings are the epitome of function, not elegance; the majesty of RT is our grounds. Anything that detracts from their natural beauty is an insult.

Our grounds are lovely in every direction but the marsh is unique. After a day of being functional at work and coming home to functional architecture, a few minutes standing on the bank of the marsh can provide a wonderful moment of mind restoration. Having to view our marsh over a levee and pumping station in the foreground would be like viewing an ancient, magnificent cathedral with a sleazy hot-dog stand on the front lawn.

I am certainly in favor of the levee to prevent flooding, but **put the thing where it belongs** on the other side of the parkway.

Regards, (b) (6)

No response needed

From:(b) (6)Sent:Saturday, June 25, 2022 2:32 AMTo:DC-Metro-CSRM-StudySubject:[Non-DoD Source] Re: Webmaster Update: ffxnow.com

Hi ffxnow Team,

Hope you are doing well.

My experts were analyzing your website and found that your website is not handling recent updates from search engines.

It's a fact that having a website won't make you bring in visitors. If you do not get higher search visibility, rankings, and organic search traffic, you may fall behind your competitors.

Google wants its visitors to have the best possible experience and these factors play an important role in determining your rank in SERP:

- 1. For most of the competitive keywords or phrases you rank beyond 100.
- 2. Your website is not ready for the upcoming responsive design update.
- 3. So many technical errors present on your website making it difficult to index.
- 4. Lack of theme based quality backlinks.

We follow a technically advanced and tested approach to adhere to the latest algorithmic updates. We will prepare an advanced digital marketing campaign to generate maximum traffic and enhance your ranking.

Sounds Interesting! Please reply back and our PR executives will get in touch, with a detailed analysis report without any obligation.

Best Regards,	
(b) (6)	

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From:(b) (6)Sent:Friday, June 24, 2022 5:03 PMTo:DC-Metro-CSRM-StudySubject:[URL Verdict: Unknown][Non-DoD Source] Please extend the comment deadline

On behalf of the Friends of Dyke Marsh, I am requesting an extension of the June 30, 2022, deadline for the submission of public comments on the U.S. Army Corps of Engineers' Draft Integrated Feasibility Report and Environmental Assessment for the Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study (May 2022). (<u>https://www.nab.usace.army.mil/DC\_Coastal\_Study/</u>)

At the Corps' public meeting on June 14, 2022, there were multiple questions and general objections about the proposed Belle Haven floodwall and levee system. The Corps' June 30 deadline fails to give the public, the affected community residents, the Friends of Dyke Marsh and other organizations a reasonable amount of time to review the draft, 2,204-page report and to submit comments on this important issue.

We hope you will agree to this request and look forward to hearing from you.



From:(b) (6)Sent:Friday, June 24, 2022 3:00 PMTo:DC-Metro-CSRM-StudySubject:[URL Verdict: Unknown][Non-DoD Source] Tentatively Selected Plan - Alternative 8

I am writing to STRONGLY OPPOSE the tentatively selected plan as outlined by the USACE on June 14, 2022 at our neighborhood briefing.

I am a resident/owner at River Towers Condominiums. I believe there are better alternatives to the tentatively selected plan.

I also believe that what is essentially a two-week comment period is not sufficient to allow area residents time to study and contemplate the proposed tentatively selected plan.

I have many objections to this idea. I also believe it would be more beneficial for the USACE to study an option to build floodwalls, levees and other stormwater and rain drainage mitigation efforts on the EAST side of the GW Parkway, in areas such as those owned and managed by the National Park Service.

#### Thank you for your time and attention.



Please consider your environmental responsibility before printing this e-mail & any documents.

From:	(b) (6)
Sent:	Thursday, June 23, 2022 5:56 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Re: water mitigation plan, please consider



From:	(b) (6)
Sent:	Thursday, June 23, 2022 8:36 AM
То:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Flood Wall and Levee at River Towers

Hello,

Should I assume if the plan goes forward that River Towers would be compensated for the land? And if so, would you have an idea of the amount?



Resident-River Towers

## Roach, Andrew <sup>(D) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Thursday, June 23, 2022 7:53 AM
To:	DC-Metro-CSRM-Study
Subject:	[URL Verdict: Unknown][Non-DoD Source] Comments on Draft Integrated Feasibility Report & EA
Attachments:	USACE - Draft.docx

(Note: I have included this as a Word attachment in case the format of this email become scrambled.)

To Whom It May Concern:

My name is (b) (6) and I live at the River Towers Condominiums (specific address in signature line at end) in the Belle View area. I worked for the Federal Energy Regulatory Commission and was the Director of the Office of Energy Projects. My staff had numerous interactions with US Army Corps of Engineers (USACE or Corps) on many natural gas pipeline and hydroelectric projects and I always valued the professional and productive interaction that occurred between my staff and the staff of various Corps districts, including the Baltimore District. Given my background, I can appreciate the work performed so far on the Draft Integrated Feasibility Report and Environmental Assessment (Draft Study) by the Corps. I have examined the Draft Study (and appendices) and attended the June 14, 2022, public meeting and recognize that, at this point, the work done by the Corps is leading to a Final Study. Much more must be done to make any recommendations made by the Final Study into reality.

At the outset, I state that I have no argument or do not debate that flood risks are increasing for the Belle View area and believe that a solution is necessary. In this vein, the "No Action" alternative required for NEPA documents is not a viable alternative. I also believe that the "Tentatively Selected Plan" – Alternative 8 – is the best suited option for the situation. My concerns will focus specifically on the alignment of the Belle Haven Floodwall and Levee (BHFL) and I hope they will be considered in the Final Study.



The alignment of the BHFL appears to be sited completely on private lands. This has a huge impact on property values as well as the landowners' accessibility to their own properties (e.g., how do single family homes access their driveways if a floodwall – as depicted in the diagram above – is built across the properties' frontage?). In my specific circumstance – as a resident of River Towers – the alignment of the floodwall and levee would enter River Tower property and: interfere with access to a parking area for both vehicles and boats (and two trash collection areas), be located very close to two of the three residential buildings, cut off direct access to our tennis courts and basketball court, and restrict access to the picnic area and garden. This alignment on River Tower property cannot achieve an appropriate balance of flood control and maintain property usage, access, and value. Further, this imbalance of negative impacts is applicable to all of the BHFL study area.

A potential solution which would protect not only the BHFL study area but also the George Washington Memorial Parkway (GWMP) would be to site the floodwall on the east side of the GWMP. I realize the difficulty in dealing with the National Park Service (NPS) in that there would have to be a Special Use Permit or, possibly, an Act of Congress to make this option work. Nevertheless, this option is simplistic in design, preserves property values and uses, does not necessarily result in diminished use of GWMP amenities (with proper design), would not complicate already dangerous intersections on the GWMP at Belle Haven Road and Belle View Boulevard, and would save the GWMP from flooding that would impair use and cause damage to the roadway.

If the proposal above is not feasible, then I would ask that the Corps realign the floodwall and levee on the River Towers property. The realignment I propose would be at the River Towers property line, either on the River Towers side or on the National Park Service side. This would avoid a large sacrifice of land and functions for the River Towers residents with minimal, if any, impact on NPS lands.

If realignment to the GWMP or to the River Towers' property line is not adopted in the Final Study, I must then oppose the currently proposed Draft Study.

Thank you for your consideration of my comments.

## Regards,



To Whom It May Concern:

My name is (b) (6) and I live at the River Towers Condominiums (specific address in signature line at end) in the Belle View area. I worked for the Federal Energy Regulatory Commission and was the Director of the Office of Energy Projects. My staff had numerous interactions with US Army Corps of Engineers (USACE or Corps) on many natural gas pipeline and hydroelectric projects and I always valued the professional and productive interaction that occurred between my staff and the staff of various Corps districts, including the Baltimore District. Given my background, I can appreciate the work performed so far on the Draft Integrated Feasibility Report and Environmental Assessment (Draft Study) by the Corps. I have examined the Draft Study (and appendices) and attended the June 14, 2022, public meeting and recognize that, at this point, the work done by the Corps is leading to a Final Study. Much more must be done to make any recommendations made by the Final Study into reality.

At the outset, I state that I have no argument or do not debate that flood risks are increasing for the Belle View area and believe that a solution is necessary. In this vein, the "No Action" alternative required for NEPA documents is not a viable alternative. I also believe that the "Tentatively Selected Plan" – Alternative 8 – is the best suited option for the situation. My concerns will focus specifically on the alignment of the Belle Haven Floodwall and Levee (BHFL) and I hope they will be considered in the Final Study.



The alignment of the BHFL appears to be sited completely on private lands. This has a huge impact on property values as well as the landowners' accessibility to their own

properties (e.g., how do single family homes access their driveways if a floodwall – as depicted in the diagram above – is built across the properties' frontage?). In my specific circumstance – as a resident of River Towers – the alignment of the floodwall and levee would enter River Tower property and: interfere with access to a parking area for both vehicles and boats (and two trash collection areas), be located very close to two of the three residential buildings, cut off direct access to our tennis courts and basketball court, and restrict access to the picnic area and garden. This alignment on River Tower property usage, access, and value. Further, this imbalance of negative impacts is applicable to all of the BHFL study area.

A potential solution which would protect not only the BHFL study area but also the George Washington Memorial Parkway (GWMP) would be to site the floodwall on the east side of the GWMP. I realize the difficulty in dealing with the National Park Service (NPS) in that there would have to be a Special Use Permit or, possibly, an Act of Congress to make this option work. Nevertheless, this option is simplistic in design, preserves property values and uses, does not necessarily result in diminished use of GWMP amenities (with proper design), would not complicate already dangerous intersections on the GWMP at Belle Haven Road and Belle View Boulevard, and would save the GWMP from flooding that would impair use and cause damage to the roadway.

If the proposal above is not feasible, then I would ask that the Corps realign the floodwall and levee on the River Towers property. The realignment I propose would be at the River Towers property line, either on the River Towers side or on the National Park Service side. This would avoid a large sacrifice of land and functions for the River Towers residents with minimal, if any, impact on NPS lands.

If realignment to the GWMP or to the River Towers' property line is not adopted in the Final Study, I must then oppose the currently proposed Draft Study.

Thank you for your consideration of my comments.

Regards,



From:Grace Tucker (b) (6)Sent:Wednesday, June 22, 2022 2:08 PMTo:DC-Metro-CSRM-StudySubject:[Non-DoD Source] Metro DC CSRM comment period extension?

Hi there,

I'm reaching out to see if the comment period for the draft Integrated Feasibility Report and EA for the Metro DC CSRM Study will be extended and if so, when the public will be notified of that extension.

Thank you, Grace Tucker



Grace Tucker she/her Senior Analyst, Virginia Coasts and Watersheds

Environmental Defense Fund 1875 Connecticut Ave NW, Suite 600 Washington, D.C. 20009 T 202 572 3536 (b) (6) edf.org

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From:	(b) (6)	
Sent:	Wednesday, June 22, 2022 1:28 PM	
To:	DC-Metro-CSRM-Study	
Subject:	[Non-DoD Source] Levee proposal concerns	

Good afternoon,

I am a young member of the river towers condominium complex and have recently been informed that you all are considering building a levee on our property. I recently moved to this complex and absolutely love it but not to the extent of those around me who have inhabited these buildings for, some of them, more than a decade. I say this because I know that if I'm writing to you, and I don't have near as much seniority as some, others will be writing to you too. Please take this into consideration as we are the people. We are the people who inhabit this space and I know that may seem unrelated to you because it's not you who would have to endure the noisy and destructive nature of this process and if it were, maybe you would reconsider. And there lies the problem. You have no legacy in this community therefore you are completely removed from it yet find the need to interject only to suit your needs at the expense of others. I mean, this is in line with standard government infringement, but if there are other ways to go about building this levee then please seek those options out first. Otherwise you'll seek to represent yourselves as callous, petty, elitist narcissists with sociopathic tendencies which falls in line with characteristics associated with upper class America. However, most of us, aren't upper class America and have souls. Try to have one too.



## Roach, Andrew <sup>(D) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Wednesday, June 22, 2022 11:22 AM
То:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Flood plan for Belleview/Belle Haven

To those who are concerned,

As a resident of the area, I find many deficiencies in this report. The properties and residence involved are not sufficiently considered. While I do support the intention of the Corp to mitigate climate flooding events, the plan does not address other contributing infrastructure issues to the areas flooding such as run off a challenged sewer system, conduit collapse upstream that has silted up the West channel and impacted its plant and animal life etc that have already caused issues in prior storms.

Construction of the wall as recommended over 4 years with a noise level stated of 80 degibels during construction, is also concerning to me. The noise during the construction and lifestyle issues that would ensue would prove deletorory to my already compromised hearing and quality of life. Noise, access to recreational and functional areas, aesthetics, as well as my net worth, would be compromised. Not small considerations.

There are other issues to note as well.

--The plan does not consider the impact to EMR service that would ensue when the existence of a west wall along the GW parkway causes that road to be awash in flood waters and potentially washed away.

--Property value loss was not considered at all or loss of community access to both Parkservice recreational areas and River Tower properties that's form the lifeblood of this community.

If you looked at other urban mitigation plans you can see where such structures have become community assets rather than detractors.

-- Both Belleview and RiverTowers might be considered candidates for the register of historic places.

--The plan dismisses the water born animal life due to the condition of the wetland currently. This condition is a result of negligence on the part of government in dealing with upstream construction and although the wetlands are the natural extension of Dyke Marsh, the waterway health has not been taken care of a d therefore should not be a reason to continue the status of neglect.

Thank you for considering these comments as we move to better solutions.

#### (b) (6)



From:	(b) (6)
Sent:	Wednesday, June 22, 2022 11:12 AM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] comment on floodwall and levee proposal at Belle View, Alexandria VA

Good Morning, I have reviewed the plan and the presentation delivered at Belle View Elementary School on June 14. I would like to offer the following comments.

I understand and support the plan, but I live in the **(b)(C)** building at River Towers and am concerned that a flood wall placed so close to the building will be extremely detrimental to my property value. In my review of the plan it appears the flood wall is cutting into about 30% of River Towers property through eminent domain. I disagree with the amount of land being appropriated in eminent domain. The flood wall could be moved back away from the **(b)(6)** building closer to the basketball court and at the edge of our property lines. The wall does not need to cut into River Towers property as much as the plan indicates that it will. I do not understand why all that land is being appropriated.

Perhaps this was discussed at the meeting, but I was unable to attend and would like it noted and entered into the record.

Tha	nks,	
(b)	(6)	

From:	(b) (6)
Sent:	Wednesday, June 22, 2022 9:47 AM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Flood wall

USACE,

My name is (b) (6) and I am an owner of a condominium at (b) (6) Wakefield Dr. (b) (6) called River Towers, in the Belle View area of Alexandria, Va.

I'm writing to express my opposition to the proposed construction of a flood wall in our community.

The proposed wall would have a severe negative impact on our way of life here, restricting access to our amenities and the great views we have.

The vast majority of the residents here also oppose the plan.

#### Sincerely, b) (6)

From:Rinehart, Nicholas (b) (6)Sent:Wednesday, June 22, 2022 9:31 AMTo:DC-Metro-CSRM-StudySubject:[URL Verdict: Neutral][Non-DoD Source] FW: Belle Haven Watershed Flood Mitigation

Good morning,

Please see the below comments we've received regarding the proposed Tentatively Selected Plan. Thanks.

Respectfully yours in public service,

Nick Rinehart Land Use & Development Liaison Supervisor Dan Storck Mount Vernon District Fairfax County Board of Supervisors 2511 Parkers Lane Mount Vernon, VA 22306 O: 703-780-7518





https://www.fxva.com/southcounty/

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From: (b) (6)	
Sent: Tuesday, June 14, 2022 12:25 PM	
то: <mark>(b) (6</mark> )	

#### Subject: Belle Haven Watershed Flood Mitigation

Supervisor Storck, Chairman McKay, Virginia Delegate Krizek, Virginia Senator Surovell, Congressman Beyer, Fairfax County Stormwater:

I've spoken with many of you over the past 2 weeks and since Hurricane Isabel in 2003. As some of you know the (b) (6) are 32 year residents of this community. I was honored to sit on Gerry Hyland's Flood Mitigation Task Force along with (b) (6) and 5 other individuals from this community. Many thanks to (b) (6) and his staff over the years for keeping me informed and answering/returning calls during storm events

Gerry's task force concluded when he retired; however, we are at a monumental crossroads regarding tonight's WMCOG/USACE presentation of flood mitigation for the Belle Haven watershed. Our task force's meetings with Representatives Moran and Beyer concluded that the only viable solution to flooding would be with and on National Park Service land. See <u>Report to Don Beyer</u>. A wall on VDOT/private land to the west of the GWMP was rejected 3 to 1 by our community. A 5' high wall with all trees removed within 40' is not palatable. We did then and still do support a levee or levee/wall combination on the east side of the parkway per alignment PLAN A in the 2014 report. We also strongly support a more permanent traffic solution at the Belle Haven and Belle View intersections with funding from the Great American Outdoors Act. Our community Zoom last Tuesday reinforced a combined effort to solve both flood and traffic issues.

The Corps did not develop detailed graphics of an east side levee option in 2014. Before tonight's meeting, please take a look at the at conceptual ideas for 2014 Study PLAN A. PLAN B (a wall down the center) is also included. Additionally, below are 3 short "Walkthroughs" of a levee from a motorists and bicyclists vantage point.

East Side of GWMP Levee Conceptual Plan "Drive up the GWMP - Levee" 90 second video "Bike Trail on Top of Levee - 1" 15 second video "Bike Trail on Top of Levee - 2" 30 second video

It's time for a reset. Our efforts from 2003 through 2015 have not gone to waste. We need to convince the MWCOG and USACE to use their 2022 first draft as a starting point for a solution that truly addresses the needs of this community of 3,000 with a tax base in excess of \$700,000,000. Let's revisit and further develop the 2014 study options.

We also need your support to engage with the NPS and ultimately Congress to allow for modification of the memorial to our first president. George Washington was a surveyor and explorer. He sought passage to the interior of a new nation building trails, roads, canals, etc. He transformed land and water to set a budding nation on an historical path. Our community of New Alexandria (founded 1892) predates his GWMP memorial. If it were not for the 4 Pennsylvania businessmen that founded New Alexandria and the New Alexandria and Mount Vernon Railway, the memorial could very well have been the original Washington-Rochambeau route further inland that George traveled from his Mount Vernon home to Alexandria and on to Philadelphia. I think George would whole-heartedly approve a tasteful, environmentally sound modification of his memorial and solution for our wonderful community.

Respectfully,





From:	Rinehart, Nicholas <mark>(b) (6)</mark>
Sent:	Wednesday, June 22, 2022 9:22 AM
To:	DC-Metro-CSRM-Study
Subject:	[URL Verdict: Neutral][Non-DoD Source] FW: Opposition to "Tentatively Selected Plan – Alternative 8 – Belle Haven Floodwall and Levee
Attachments:	view from window.jpg; View from window 2.jpg

Good morning, please see the comments that were sent to our office regarding the Tentatively Selected Plan in the USACE coastal storm risk management study.

Thank you.

Respectfully yours in public service,

Nick Rinehart Land Use & Development Liaison Supervisor Dan Storck Mount Vernon District Fairfax County Board of Supervisors 2511 Parkers Lane Mount Vernon, VA 22306 O: 703-780-7518





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Sent: Monday, June 13, 2022 7:37 PM

To: (b) (6)

Subject: FW: Opposition to "Tentatively Selected Plan – Alternative 8 – Belle Haven Floodwall and Levee

Respectfully yours in public service,

Dan Storck Supervisor Mount Vernon District 2511 Parkers Lane Alexandria, VA 22306 Main: 703-780-7518 www.fairfaxcounty.gov/MountVernon

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To The Fairfax County Office of Environmental and Energy Coordination:

This plan is unacceptable for the following reasons:

1. A wall across the back of our property will not stop water, it will cause it to pool. Having nowhere to retreat, the only place for it to go would be the first floor of our building.

2. Water that is pushed back into the creek will have to go somewhere. I don't think our neighbors on Tulane Drive in the Westgrove neighborhood would want it landing in their backyards.

3. Belle View flooded (from Hurricane Isabel in 2003) because their sewage pumps failed.

3. **River Towers Buildings did not flood** in 2003 from Hurricane Isabel. Period. We carry flood insurance on all three buildings in case they ever do. We are fully aware of the risk.

4. Water from the tidal surge (from Isabel) came up the creek and receded later. It was mitigated by our trees and vegetation throughout the back of our property (the picnic grove in particular). The tennis court, basketball court and the parking lot behind the 6621 building all acted as first lines of defense. The surge did not cause our buildings to flood, **nor did it cause Belle View to flood**.

In short: Walling off the back of River Towers will not save Belle View.

Further concerns:

1. Building a connective wall behind River Towers would require the removal of **hundreds** of trees, as well as the parking lot (behind 6621), the basketball court, and the tennis court, **the very things that have protected us from flooding all these years!** 

Our trees help protect the ground from erosion and flooding. The canopy they provide keeps the ground from being more saturated when it rains. **This is not news!** We are already having success with recently planted trees.

2. Digging into the ground would upset the water table causing the water to seep into our building foundation, **the very thing we want to avoid.** 

## Alternative Proposal

1. Implement a **massive** tree planting initiative **now**, at River Towers, in Belle View/ New Alexandria/ Belle Haven and along the GW Parkway. Plant indigenous trees that will thrive in this environment.

2. Replace the old pumps with newer, more efficient ones. Replace old pipes with newer, larger ones that can accommodate more water.

If this is truly about preventing future flooding, please do this **intelligently** and **strategically** in line with current data and in partnership with already existing tools: **our trees.** 

Thank you.







From:	Jennifer Szabo (b) (6)
Sent:	Tuesday, June 21, 2022 4:23 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Belle Haven Floodwall and Levee Project - Concerned Homeowner

To Whom it may concern,

I would like to express my concern for the flood wall and levee construction plan around River Towers. As a resident of River Towers, I vehemently oppose this plan as it is currently laid out.

This plan threatens to remove 30% of our property from our possession, decrease our view, decrease our property values, poses evacuation risks to my building, and greatly increase the chances of storm runoff damaging our buildings.

Please do not go forward with this plan, and consider the hundreds of homeowners in this area. My husband and I are first time property owners, and hope to live in this condo for a very long time. He is an NCO in the Army, and we have great respect for what you do, but please reconsider walling off the area around our property.

Thank you for your consideration,

(b) (6)



## Roach, Andrew <sup>(D) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Tuesday, June 21, 2022 2:25 PM
To:	DC-Metro-CSRM-Study
Subject:	[URL Verdict: Neutral][Non-DoD Source] Public comment on NOVA Coastal Study

Enclosed please find comments on the NOVA Coastal Study. Comments are made primarily for the Belle Haven/Belle View/River Towers area, but may apply more broadly.

#### Geotechnical concerns - unstable soils unsuitable for levees/floodwalls

Appendix D, Page 12: Section 9 states significant concerns/shortcomings regarding the suitability of soils in the Belle Haven area for flood structures. This is consistent with common knowledge of residents in the area – for example, the length along River Towers is bordering wetlands and is frequently soggy. While there has been a cost risk factor assigned in the cost estimating process, this is a significant concern that needs explicit discussion in the main report. Public safety with project in place needs discussion in this regard. The public have vivid recollection of floodwall failure in New Orleans, and the manner in which this would be addressed in more detailed design as well as the implications for cost, real estate, etc. must be explicitly addressed for this topic and its risks to be understood by decisionmakers and the public. This is too big an issue to be relegated to a cost-risk exercise.

#### Land-side flooding / interior drainage / residual damages/ routine pumping needs with project in place

At the June 14 public meeting one of the Baltimore District engineers stated that non-coastal events were not considered in the analysis. The report needs to address "land-side" flooding with respect to drainage and potential pump station usage during thunderstorm/rainfall events. It is common to get overflow and ponding from thunderstorm events in the Belle Haven/Belle View areas- circumstances with project in place need to be explicitly addressed to determine what if any impacts there would be to interior flooding and pump station operation. Storm frequency and intensity are expected to increase with continued climate warming – the question of how routine flooding events will be different with a project in place needs to be explicitly addressed.

#### Adaptive management and sustainability

The report should address the potential for the floodwall/levee height to be increased in the future as sea level and other conditions change beyond the period of analysis. How adaptable is the proposed project to future changes that may become necessary in the future? High level estimates for sea level rise shown in the report were as much as 8 feet in a 100-year projection. A project envisioned now needs to be adaptable to future potential increases as needed across timeframes beyond the 50-year period of analysis for the study.

#### Main report, p. 168 (tie-in at Westgrove Dog Park)

"The floodwall would continue west to West Wakefield Drive and tie into a small portion of earthen levee ending at Westgrove Dog Park." Based on walking in the park, I saw nothing resembling a certifiable levee segment in the park. There is high ground to tie into, but the length of proposed levee would likely need to be extended to tie into high ground directly rather than assuming an existing levee structure to tie into. This would presumably increase costs somewhat. Resident concerns / opposition - It was evident at the public meeting that there are still significant concerns among potentially affected residents across an array of topics. I expect these concerns will be well covered by others so I have restricted my comments to technical items above.

Web site suggestion:

NOVA Coastal Study (army.mil)

It would be helpful to list the Appendix topics on the web site links, rather than just the Appendix alphabetical label.

Respectfully,

#### (b) (6)

River Towers Resident Alexandria, VA

 From:
 (b) (6)

 Sent:
 Tuesday, June 21, 2022 9:47 AM

 To:
 DC-Metro-CSRM-Study

 Subject:
 [Non-DoD Source] Media request -- Meeting recording -- draft report for Metro DC coastal storm study

Good morning,

Is there a recording of the meeting that was held on the Metro DC coastal storm study that looked at the Potomac River from Arlington County to Prince William County on June 14 or the one on June 16? I'm writing an article about the study and was hoping to be able to include a link or add information from the presentation.

If you're able to provide a link to the recording or attach it, I would greatly appreciate it. Thank you!

(b) (6) Editorial Team Lead Local News Now

## Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Monday, June 20, 2022 1 <u>2:38 PM</u>
To:	DC-Metro-CSRM-Study; (b) (6)
Cc:	(b) (6)
Subject:	[Non-DoD Source] Comments re: Flood mitigation plan in Belle Haven, River Towers Property

To whom it may concern,

My name is (b) (6) , my husband, young son, and I are residents of River Towers, building (b) (6) unit <sup>(b) (6)</sup>. My son is a student at (b) (6) . Due to a demanding schedule, I have only recently learned of the flood mitigation plan recently presented to our community. I suspect many homeowners here due to busy schedules, may be unaware of this plan and the

potential consequences of this decision.

After searching for two years, my husband and I fell in love with River Towers and purchased our ground floor unit in early 2020. We renovated our 1960's condominium through the covid lockdown with the intent to retire here. The sole reason we purchased this unit was the parklike setting and connection to Dyke Marsh. After reviewing the Army Core of Engineers tentative plan to build a floodwall directly behind our building, I was literally in tears for two days.

I appreciate the urgency and necessity to build a floodwall to protect the Belle Haven community, however I ask that you proceed with as much sensitivity toward the residents here as you have given to the natural habitat of Dyke Marsh.

The proposed wall around River Towers as shown in the plan, is so close to the building that it potentially closes off all but one window to our 950 square foot home. The remaining window will look out over the proposed water pump.
The plan as shown in FIGURE 2. TENTATIVELY SELECTED PLAN -BELLE HAVEN FLOODWALL AND LEVEE, appears to place the wall along the sidewalk at the rear of building 6621 and 6631, dividing River Towers' open spaces and severing its recreational assets, garden beds, tennis courts, lawns, community garden, and basket ball court from the rest of the property.

Is it necessary to erect an intrusive wall of this size so close to the building when there is easily 150 feet from the building to the property line?

There will be considerably more disruption to daily lives and landscape than if it were built near or along the back of the property. Mature trees and gardens near the building that add to the value of our property would be sacrificed.

I seek to understand how the close proximity of the wall to the buildings 6631 & 6621 is preferred since it would potentially bring flood waters much closer to the foundation of the buildings than if it were built near or on the federal property line. This is especially concerning given the structural degradation, subsequent resident evacuation, and refurbishment of building 6631 three years ago.

This plan requires two costly storm gates at the base of building 6621.

I have considered that to some residents on upper south facing units, locating the floodwall at the base of the building may provide a preferred uninterrupted green view of the marsh. However, the cost of that uninterrupted view for the few, is the elimination of any view for others.

The cost is just too great for all residents:

-the severing of five (5) recreational assets

-dramatic division of our open parklike spaces
-installation of two ugly storm gates at the East lot that will be visible from the front of the building
-loss of landscaping and gardens near construction sites
-loss of mature trees near the buildings
-risk to two building foundations
-inconvenience navigating construction site and equipment to access homes during 2-3 year installation, especially for our elderly, handicapped, and young families
-devastating property values of more than 500 home owners

(Haven't we suffered enough economic loss through Covid and the war in Ukraine?)

We ask you to move the wall to the outer edge of the property to preserve the open spaces and recreational assets that give our property it's unique beauty and value.

Building the wall at the edge of the eastern and southern property lines as shown in the attachment would eliminate the necessity for two flood doors at the east parking lot, making it less expensive and less hazardous during storm surge. It would keep the flood waters further from the base of the buildings. It would still provide marsh views for upper floors, and maintain reasonable views for lower floors. Most importantly, it would keep the value of our property in tact.



I am also including an article from the Washington Post from 2016. If my letter has not outlined adequately what is at stake here for our property owners, perhaps this may help.

https://www.washingtonpost.com/realestate/where-we-live-rivertowers-is-a-hidden-away-gem/2016/03/31/3d002ad4-e4b6-11e5b0fd-073d5930a7b7 story.html

I thank you for your time, consideration, and respectful sensitivity to those of us that truly love and have invested in this beautiful property.

Sincerely, (b) (6) and family



## Hi (b) (6)

Thank you for sharing your concerns. As I have been mentioning to folks, we need you to share your comments with the Corps directly so they have a record of individual and community questions or concerns. Please urge your neighbors to do the same.

Respectfully yours in public service,

Dan Storck Supervisor Mount Vernon District 2511 Parkers Lane Alexandria, VA 22306 Main: 703-780-7518 www.fairfaxcounty.gov/MountVernon

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From: (D) (6) Sent: Thursday, June 16, 2022 8:53 AM



Subject: RE: Opposition to "Tentatively Selected Plan – Alternative 8 – Belle Haven Floodwall and Levee"

#### Dear(b) (6)

Thank you for your feedback on behalf of your community! We want to ensure that your valuable comments reach the correct entity. The Tentatively Selected Plan is conducted by the U.S. Army Corps of Engineers (USACE), rather than our office. I have CC'd them here, but to ensure your comments are received (if you haven't already), please reach out to the USACE email address at DC-Metro-CSRM-Study@usace.army.mil. For additional clarification on the difference between the USACE plan plan and our "Resilient Fairfax" initiative, please see the email attached here.

However, in the spirit of responsive local government and in case it is helpful, we would like to provide clarity on one historical piece that we felt could have been more clearly explained at the public meeting. The tidal surge during Hurricane Isabel was indeed the original source of the flooding in Belle View. River Towers is at a slightly higher elevation than other parts of the neighborhood, which is why it did not flood during Isabel, but is projected to be vulnerable to flooding with a larger storm event combined with sea level rise. The wastewater infrastructure systems were overwhelmed and inundated by the tidal flooding during Isabel, which caused backups and additional flooding in homes. If additional information on Hurricane Isabel, tidal flooding, or how the pump stations and tide gates work to prevent some of the concerns listed would be helpful, I have cc'd Matt Meyers, who was part of the Department of Public Works and Environmental Services (DPWES) response team at the time of the hurricane.

Thank you again,

Allison

#### Allison Homer, AICP, LEED AP ND

Planner IV, Senior Community Specialist Office of Environmental and Energy Coordination 12000 Government Center Parkway, Suite 533 Fairfax, Virginia 22035 571-460-8385 Follow us on Twitter Follow us on Facebook



From: (b) (6) Sent: Wednesday, June 15, 2022 9:24 PM

To: (b) (6)

Subject: Fwd: Opposition to "Tentatively Selected Plan – Alternative 8 – Belle Haven Floodwall and Levee"



Please note well my opposition to "Tentatively Selected Plan – Alternative 8 – Belle Haven Floodwall and Levee" below.

Respectfully,

#### b) (6)

----- Original Message -----

From: (b) (6) To: (b) (6)

Date: June 15, 2022 at 9:11 PM

Subject: Opposition to "Tentatively Selected Plan – Alternative 8 – Belle Haven Floodwall and Levee"

To The Fairfax County Office of Environmental and Energy Coordination:

My name is (b) (6) I am a 31-year resident of the (b) (6) building at River Towers. I have a front-row seat to the effects of rain and flooding at River Towers.

This plan is unacceptable for the following reasons:

1. A wall across the back of our property will not stop water, it will cause it to pool. Having nowhere to retreat, the only place for it to go would be the first floor of our building.

2. Water that is pushed back into the creek will have to go somewhere. I don't think our neighbors on Tulane Drive in the Westgrove neighborhood would want it landing in their backyards.

3. Belle View flooded (from Hurricane Isabel in 2003) because their sewage pumps failed.

3. **River Towers Buildings did not flood** in 2003 from Hurricane Isabel. Period. We carry flood insurance on all three buildings in case they ever do. We are fully aware of the risk.

4. Water from the tidal surge (from Isabel) came up the creek and receded later. It was mitigated by our trees and vegetation throughout the back of our property (the picnic grove in particular). The tennis court, basketball court, and the parking lot behind the 6621 building all acted as first lines of defense. The surge did not cause our buildings to flood, **nor did it cause Belle View to flood**.

In short: Walling off the back of River Towers will not save Belle View.

Further concerns:

1. Building a connective wall behind River Towers would require the removal of **hundreds** of trees, as well as the parking lot (behind 6621), the basketball court, and the tennis court, **the very things that have protected us from flooding all these years!** 

Our trees help protect the ground from erosion and flooding. The canopy they provide keeps the ground from being more saturated when it rains. **This is not news!** We are already having success with recently planted trees.

2. Digging into the ground would upset the water table causing the water to seep into our building foundation, **the very thing we want to avoid.** 

#### Alternative Proposal

1. Implement a **massive** tree-planting initiative **now**, at River Towers, in Belle View/ New Alexandria/ Belle Haven and along the GW Parkway. Plant indigenous trees that will thrive in this environment.

2. Replace the old pumps with newer, more efficient ones. Replace old pipes with newer, larger ones that can accommodate more water.

If this is truly about preventing future flooding, please do this **intelligently** and **strategically** in line with current data and in partnership with already existing tools: **our trees**.

Thank you.



From:	(b) (6)
Sent:	Thursday, June 16, 2022 7:11 PM
То:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Against proposal

As a homeowner living in River Towers I strongly oppose the proposal for the Belle View Floodwall that would eliminate the entire parking lot beside (0.00), basketball and teams courts, and shrink the community square footage. As you are aware as brought up at the public meeting held June 14, our community did not flood during what is called the 100 year flood. Putting a floodwall on the wrong side of the parkway would do more harm than good.

Kind regards,



Sent from my iPhone

From:(b) (6)Sent:Thursday, June 16, 202To:DC-Metro-CSRM-StudySubject:[Non-DoD Source] Corr

Thursday, June 16, 2022 4:47 PM DC-Metro-CSRM-Study [Non-DoD Source] Comments on Belle Haven flood wall study

# Hello,

I would like to offer my comments on what USACE calls the Belle Haven flood wall study. The more accurate name would be the Belle View/New Alexandria flood wall, since Belle View and New Alexandria are the neighborhoods which would be directly affected. Belle Haven is an adjoining neighborhood not directly impacted by the proposed lay down of the flood wall.

Firstly, let me make clear that I believe all of us will face increasingly worse flooding and extreme weather events in the coming years, and that we all must be willing to make compromises to our lifestyles to mitigate these risk, and be willing to accept some disruption in our backyards.

That said, I feel the US Army Corps of Engineers' specific lay down of the floodwall and pumping stations in the Belle View and River Towers grounds is unacceptable to the aesthetics, the property values and the environment of the community. This plan doesn't mitigate against regular storm water flooding, which is a frequent problem in the community. The floodwall (and its construction) potentially threatens the Dyke Marsh protected zone, and its wildlife.

The wall cuts across much of River Towers property, where I've lived for 14 years, leaves questions about resident access to the property's amenities such as the gardens, parking lots, basketball courts, etc. Construction would likely take years and be very disruptive. The pumping station would be a noisy eyesore. The homes we love and have hoped to spend our lives in would be permanently changed if not ruined.

Thank you for your time and for your service to the community,



Sent from my iPhone, please excuse brevity or typos.

From:	(b) (6)
Sent:	Thursday, June 16, 2022 4:41 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Metropolitan Washington District of Columbia Coastal Storm Risk Management Feasibility Study

Hello,

I have been informed by the Virginia DHR (SHPO) that they have not been requested by NEPA and 106 consultations regarding a Programmatic Agreement. Within the study Page 147 it says

"Potential visual effects from the GWMP and Mount Vernon Trail of the proposed floodwall. Belle Haven neighborhood has never been evaluated for the NRHP; it may need to be formally evaluated to determine how it may be affected. Archaeological surveys may be needed in locations of proposed levee/floodwall construction."

- 1. The neighborhoods in question are Belle View and River Towers. Belle Haven is one street over. Please correct the information in the document.
- 2. I would like to have any maps etc. available of National Register listed and Determined Eligible resources in the area. From the Fairfax county line off the GWPKY and below south of Dyke Marsh.
- 3. I would like to be involved as a public consultant, as is allowed in creating programmatic agreements.

Please let me know what you need from me to participate.



From:	Homer, Allison (b) (6)
Sent:	Thursday, June 16, 2022 10:59 AM
To:	(b) (6)
Cc:	DC-Metro-CSRM-Study
Subject:	[URL Verdict: Neutral][Non-DoD Source] FW: Flood wall concerns

## Dear(b)(6):

Thank you for your feedback on behalf of your community! We want to ensure that your valuable comments reach the correct entity. The Tentatively Selected Plan relating to the floodwall is managed by the U.S. Army Corps of Engineers (USACE), rather than our office (Fairfax County OEEC). I have CC'd them here, but to ensure your comments are received (if you haven't already), please send your comments directly to the USACE email address at <u>DC-Metro-CSRM-</u> <u>Study@usace.army.mil</u>.

Our local office's initiative, "<u>Resilient Fairfax</u>," is different and separate from USACE's plan. Resilient Fairfax is broader, county-wide initiative to make Fairfax County more resilient to a range of climate hazards, including extreme heat, heavy precipitation, and increasingly severe storms. In case you are interested in our office's work, I have included links to Resilient Fairfax resources below.

- Draft Resilient Fairfax Plan
- <u>Resilient Fairfax Climate Map Viewer</u>
- Longer technical reports can be found below, if there is interest in additional detail:
  - o <u>Climate Projections Report</u>
  - o <u>Climate Vulnerability and Risk Assessment</u>
  - o Audit of Existing Policies, Plans, and Programs

We are more than happy to answer any questions about Resilient Fairfax. Questions relating to USACE's floodwall proposal (which is different from Resilient Fairfax) are best directed to USACE.

However, in the spirit of responsive local government and in case it is helpful, we would like to provide clarity on one historical piece that we felt could have been more clearly explained at the USACE public meeting. The tidal surge during Hurricane Isabel was the original source of the flooding in Belle View. River Towers is at a slightly higher elevation than other parts of the neighborhood, which is why it did not flood during Isabel, but is projected to be vulnerable to flooding with a larger storm event combined with sea level rise. The wastewater and stormwater infrastructure systems were inundated by the tidal flooding during Isabel, which caused backups and additional flooding in homes. If additional information on Hurricane Isabel, tidal flooding, or how the pump stations and tide gates work to prevent some of the concerns listed would be helpful, we can put you in touch with the Department of Public Works and Environmental Services (DPWES) staff who were on site at the time of that particular hurricane.

Thank you again,

Allison

#### Allison Homer, AICP, LEED AP ND

Planner IV, Senior Community Specialist Office of Environmental and Energy Coordination 12000 Government Center Parkway, Suite 533 Fairfax, Virginia 22035 Collice of Environmental and Energy Geoselization

From: OEEC Info (b) (6) Sent: Thursday, June 16, 2022 9:51 AM To: Homer, Allison (b) (6) Subject: FW: Flood wall concerns

From: (b) (6) Sent: Wednesday, June 15, 2022 8:23 PM To: OEEC Info (b) (6) Subject: Flood wall concerns

To whom it may concern:

I am a resident of River Towers on Wakefield Drive. I have lived here since 1995 and would like to comment on the proposed flood wall.

First of all and what will become very obvious, I am against a wall encasing the New Alexandria, Belle View, and River Towers' areas. Here are my main concerns:

1) It is already hard enough to get out onto the GW Parkway. How will we do that with a wall obstructing our view up and down the Parkway?

2) In the event of a major storm, how does water escape this area? Storm drains area already over taxed in a storm. If that water is boxed in, they will be overcome even more.

3) Has the Army Corps of Engineers considered doing something like the New Bedford, MA. Hurricane Protection Wall? It just seems to make more sense to build something like this at a narrow point in the Potomac further downstream than to try to wall off a few small neighborhoods. This way, Alexandria and Georgetown would be protected as well from a storm surge.

4) Now to River Towers in particular: The proposed wall would destroy our view of Dyke Marsh West and therefore, would destroy our property values. We would lose access to our picnic grounds and our garden plots - two major amenities currently enjoyed by many. And,

building a water pumping station on our property would also change the beautiful natural setting currently enjoyed by all 525 condos.

5) Has anyone thought about restoring Dyke Marsh West along with the major restoration that is occurring in the main part of Dyke Marsh? This area used to be a full, thriving marsh. Now it is barely a stream because of the runoff from the culvert blowout that occurred up the hill from Ft. Hunt Road. You can still see the silt pouring into the marsh on a stormy day. Please let me know if you would like pictures of what the marsh used to look like (and I mean 5 years ago - not 20) or if you would like to see pictures of the silt infiltrating the marsh.

6) I am curious what will happen to rainwater coming down the hill and across Ft. Hunt Road and the dog park. Where is that water to go? Water literally cascades across that area in a storm. If you are going to build 3 sides to a box, finish it off and protect from uphill. (Another preposterous idea...)

7) How will the gates go up or be put into place? I am assuming there are gates at the intersection of Belle View Blvd and GWP.

8) Oh, and one other thought: River Towers did not flood when Isabel came through. I was here for it. We were high enough that we escaped. We don't want a wall around us. Maybe this is shortsighted and/or meanspirited but there has to be another way. Why ruin the reason we live here? The nature, the view, the marsh.

I hope you will reconsider your suggestion of encapsulating our neighborhood. There has to be other alternatives: improve/enlarge the storm drain system, restore Dyke Marsh (both parts), a storm wall further down the Potomac, etc.

If you have any questions or need to talk to me, email is the best - (b) (6)

Thanks very much for your time and consideration.

Sincerely,





#### Dear (b) (6)

Thank you for your feedback on behalf of your community! We want to ensure that your valuable comments reach the correct entity. The Tentatively Selected Plan relating to the floodwall is managed by the U.S. Army Corps of Engineers (USACE), rather than our office (Fairfax County OEEC). I have CC'd them here, but to ensure your comments are received (if you haven't already), please send your comments directly to the USACE email address at <u>DC-Metro-CSRM-</u> <u>Study@usace.army.mil</u>.

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- Draft Resilient Fairfax Plan
- <u>Resilient Fairfax Climate Map Viewer</u>
- Longer technical reports can be found below, if there is interest in additional detail:
  - o <u>Climate Projections Report</u>
  - o <u>Climate Vulnerability and Risk Assessment</u>
  - o Audit of Existing Policies, Plans, and Programs

We are more than happy to answer any questions about Resilient Fairfax. Questions relating to USACE's floodwall proposal (which is different from Resilient Fairfax) are best directed to USACE.

Thank you again,

Allison

Allison Homer, AICP, LEED AP ND Planner IV, Senior Community Specialist Office of Environmental and Energy Coordination 12000 Government Center Parkway, Suite 533 Fairfax, Virginia 22035 Follow us on Twitter Follow us on Facebook



From: OEEC Info (b) (6) Sent: Thursday, June 16, 2022 9:51 AM To: Homer, Allison (b) (6)

Subject: FW: Comments on Resilient Fairfax Plan/USACE Belle View floodwall

From: (b) (6) Sent: Wednesday, June 15, 2022 8:35 PM To: OEEC Info (b) (6) Cc: (b) (6) Subject: Comments on Resilient Fairfax Plan/USACE Belle View floodwall

Firstly, let me make clear that I believe we will face increasingly worse flooding and extreme weather events in the coming years, and that we all must be willing to make compromises to our lifestyles to mitigate these risk.

That said, I feel the US Army Corps of Engineers' specific lay down of the floodwall and pumping stations in the Belle View and River Towers grounds is unacceptable to the aesthetics, the property values and the environment of the community.

This plan doesn't mitigate against regular storm water flooding, which is a frequent problem in the community. The floodwall (and its construction) potentially threatens the Dyke Marsh protected zone, and its wildlife.

The wall cuts across much of River Towers property, where I've lived for 14 years, leaves questions about resident access to the property's amenities such as the gardens, parking lots, basketball courts, etc. Construction would likely take years and be very disruptive. The pumping station would be a noisy eyesore. The homes we love and have hoped to spend our lives in would be permanently changed if not ruined.

Thank you for your time and for your service to the community,



From:	Homer, Allison (b) (6)
Sent:	Thursday, June 16, 2022 10:50 AM
To:	(b) (6)
Cc:	DC-Metro-CSRM-Study
Subject:	[URL Verdict: Neutral][Non-DoD Source] RE: Resilient Fairfax Plan: Flood Walls and Levee in Belle
	View area



Thank you for your feedback on behalf of your community! We want to ensure that your valuable comments reach the correct entity. The Tentatively Selected Plan relating to the floodwall is managed by the U.S. Army Corps of Engineers (USACE), rather than our office (Fairfax County OEEC). I have CC'd them here, but to ensure your comments are received (if you haven't already), please send your comments directly to the USACE email address at <u>DC-Metro-CSRM-</u> <u>Study@usace.army.mil</u>.

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We are more than happy to answer any questions about Resilient Fairfax. Questions relating to USACE's floodwall proposal (which is different from Resilient Fairfax) are best directed to USACE.

Thank you again,

Allison

Allison Homer, AICP, LEED AP ND Planner IV, Senior Community Specialist Office of Environmental and Energy Coordination 12000 Government Center Parkway, Suite 533 Fairfax, Virginia 22035 Follow us on Twitter Follow us on Facebook



From: OEEC Info (b) (6)

Sent: Thursday, June 16, 2022 9:52 AM

To: Homer, Allison (b) (6)

Subject: FW: Resilient Fairfax Plan: Flood Walls and Levee in Belle View area

From: (b) (6) Sent: Wednesday, June 15, 2022 8:44 PM To: OEEC Info (b) (6) Subject: Resilient Fairfax Plan: Flood Walls and Levee in Belle View area

To Fairfax County Members,

I am writing to you about the Resilient Fairfax Plan. I would like to comment on the plan proposed by the USACE to built a Floodwall and Levee in the Belle View and River Towers area. The extensive work done by the USACE has not discussed or involved the community to determine the full issues and needs of the community. The plan only addresses one potential issue and does not address how it will enhance already occurring issues in the area. The plan also makes short shrift of the property values of the tax paying property tax paying Fairfax County residents.

There are concerns over flooding and climate change, yes, but destroying the community and the wetlands is a much larger problem. Therefore, an analysis of the larger picture of the needs of the residents, human and wildlife, must be made before any plan is put into place.

Thank you,



From:	Homer, Allison (b) (6)
Sent:	Thursday, June 16, 2022 10:44 AM
To:	(b) (6)
Cc:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] RE: ACE Proposed Plan 5C: Fairfax County Resilient Plan

Dear(b)(6)

Thank you for your feedback on behalf of your community! We want to ensure that your valuable comments reach the correct entity. The Tentatively Selected Plan relating to the floodwall is managed by the U.S. Army Corps of Engineers (USACE), rather than our office (OEEC). I have CC'd them here, but to ensure your comments are received (if you haven't already), please reach out to the USACE email address at DC-Metro-CSRM-Study@usace.army.mil.

Our local office's initiative, "Resilient Fairfax," is different from USACE's plan. Resilient Fairfax is broader initiative to make Fairfax County more resilient to a range of climate hazards, including extreme heat, heavy precipitation, and increasingly severe storms. In case you are interested in our office's work, I have included links to Resilient Fairfax resources below.

- Resilient Fairfax webpage: Blockedhttps://www.fairfaxcounty.gov/environment-energy-coordination/resilient-fairfax

- Draft Resilient Fairfax Plan: Blockedhttps://resilientfairfax.konveio.com/

- Resilient Fairfax Climate Map Viewer :

Blockedhttps://fairfaxcountygis.maps.arcgis.com/apps/instant/media/index.html?appid=5b93ec3f3b4e4751bb63187df4 e07be4

- Climate Projections Report: Blockedhttps://www.fairfaxcounty.gov/environment-energy-

coordination/sites/environment-energy-

coordination/files/assets/documents/resilient%20fairfax/resilient%20fairfax\_climate%20projection%20report\_final\_a-1a.pdf

- Climate Vulnerability and Risk Assessment: Blockedhttps://www.fairfaxcounty.gov/environment-energy-coordination/sites/environment-energy-

coordination/files/assets/documents/resilient%20fairfax/vra%20combined%20for%20posting%20may%2016.pdf - Audit of Existing Policies, Plans, and Programs: Blockedhttps://www.fairfaxcounty.gov/environment-energycoordination/sites/environment-energy-

coordination/files/assets/documents/resilient%20fairfax/resilient%20fairfax%20audit%20revised%20clean\_3.9.2022\_50 8\_qa\_complete.pdf

We are more than happy to answer any questions about Resilient Fairfax. Questions relating to USACE's floodwall proposal (which is different from Resilient Fairfax) are best directed to USACE.

Thank you again,

Allison

Allison Homer, AICP, LEED AP ND Planner IV, Senior Community Specialist Office of Environmental and Energy Coordination 12000 Government Center Parkway, Suite 533 Fairfax, Virginia 22035 571-460-8385 -----Original Message-----From: OEEC Info (b) (6) Sent: Thursday, June 16, 2022 9:52 AM To: Homer, Allison (b) (6) Subject: FW: ACE Proposed Plan 5C: Fairfax County Resilient Plan

-----Original Message-----From: (b) (6) Sent: Wednesday, June 15, 2022 8:53 PM To: OEEC Info (b) (6) Subject: ACE Proposed Plan 5C: Fairfax County Resilient Plan

Dear OEEC:

I am writing to you regarding the Fairfax County Resilient Plan and would like to comment on the proposal by the Army Corps of Engineers (ACE) to build a flood wall around Belle View and river Towers.

While I understand the need for forward planning and appreciate the County's efforts to mitigate potential flooding in our community, I am very concerned about the plan to build a flood wall proposed by ACE. This plan is flawed in many ways, including:

-It does not address stormwater flooding, which the cause of flooding in Belle View during Hurricane Isabel.

-It does not address the aesthetic and pragmatic needs of the community or loss of amenities that would occur as a result of building a wall.

-It does not address the destruction of property and property values of our neighborhoods.

-It does not address the destruction of natural resources, including mature trees and established wetlands, which naturally mitigate flooding and global warming. These should be enhanced, not destroyed.

—The plan does not address how it would will affect Dyke Marsh and the protected Resource Protection Area designated by Fairfax County.

-It does not address how wildlife would traverse the flood wall and levee.

-I am also concerned about the impact on the quality of life for residents and wildlife from the noise from construction of the wall and proposed pumping station.

-Finally, I am concerned about the impact of this plan on our historic community — one with a rich history that should be preserved, not destroyed.

I would like the OEEC to work with the residents of Belle View and River Towers to address these concerns and feel certain that working together, we can find a solution that will address the threat of flooding as it meets our community's needs.

Sincerely,





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From:	Homer, Allison (b) (6)
Sent:	Thursday, June 16, 2022 10:31 AM
To:	(b) (6)
Cc:	DC-Metro-CSRM-Study
Subject:	[URL Verdict: Neutral][Non-DoD Source] RE: Opposition to "Tentatively Selected Plan – Alternative 8 – Belle Haven Floodwall and Levee"



Thank you for your feedback on behalf of your community! We want to ensure that your valuable comments reach the correct entity. The Tentatively Selected Plan relating to the floodwall is managed by the U.S. Army Corps of Engineers (USACE), rather than our office (Fairfax County OEEC). I have CC'd them here, but to ensure your comments are received (if you haven't already), please reach out to the USACE email address at <u>DC-Metro-CSRM-Study@usace.army.mil</u>.

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- Draft Resilient Fairfax Plan
- <u>Resilient Fairfax Climate Map Viewer</u>
- Longer technical reports can be found below, if there is interest in additional detail:
  - o <u>Climate Projections Report</u>
  - o Climate Vulnerability and Risk Assessment
  - o <u>Audit of Existing Policies, Plans, and Programs</u>

We are more than happy to answer any questions about Resilient Fairfax. Questions relating to USACE's floodwall proposal (which is different from Resilient Fairfax) are best directed to USACE. However, in the spirit of responsive local government and in case it is helpful, we would like to provide clarity on one historical piece that we felt could have been more clearly explained at the USACE public meeting. The tidal surge during Hurricane Isabel was the original source of the flooding in Belle View. River Towers is at a slightly higher elevation than other parts of the neighborhood, which is why it did not flood during Isabel, but is projected to be vulnerable to flooding with a larger storm event combined with sea level rise. The wastewater infrastructure systems were overwhelmed and inundated by the tidal flooding during Isabel, which caused backups and additional flooding in homes. If additional information on Hurricane Isabel, tidal flooding, or how the pump stations and tide gates work to prevent some of the concerns listed would be helpful, we can put you in touch with the Department of Public Works and Environmental Services (DPWES) response staff who were on site at the time of the hurricane.

Thank you again,

Allison

#### Allison Homer, AICP, LEED AP ND

Planner IV, Senior Community Specialist Office of Environmental and Energy Coordination 12000 Government Center Parkway, Suite 533 Fairfax, Virginia 22035 Collice of Environmental and Energy Coordination

From: OEEC Info (b) (6)

Sent: Thursday, June 16, 2022 9:52 AM

To: Homer, Allison (b) (6)

Subject: FW: Opposition to "Tentatively Selected Plan – Alternative 8 – Belle Haven Floodwall and Levee"

From: (b) (6) Sent: Wednesday, June 15, 2022 9:11 PM To: OEEC Info (b) (6)

Subject: Opposition to "Tentatively Selected Plan – Alternative 8 – Belle Haven Floodwall and Levee"

To The Fairfax County Office of Environmental and Energy Coordination:

My name is (b) (6) I am a 31-year resident of the  $\binom{(b)}{6}$  building at River Towers. I have a front-row seat to the effects of rain and flooding at River Towers.

This plan is unacceptable for the following reasons:

1. A wall across the back of our property will not stop water, it will cause it to pool. Having nowhere to retreat, the only place for it to go would be the first floor of our building.

2. Water that is pushed back into the creek will have to go somewhere. I don't think our neighbors on Tulane Drive in the Westgrove neighborhood would want it landing in their backyards.

3. Belle View flooded (from Hurricane Isabel in 2003) because their sewage pumps failed.

3. **River Towers Buildings did not flood** in 2003 from Hurricane Isabel. Period. We carry flood insurance on all three buildings in case they ever do. We are fully aware of the risk.

4. Water from the tidal surge (from Isabel) came up the creek and receded later. It was mitigated by our trees and vegetation throughout the back of our property (the picnic grove in particular). The tennis court, basketball court, and the parking lot behind the 6621 building all acted as first lines of defense. The surge did not cause our buildings to flood, **nor did it cause Belle View to flood**.

In short: Walling off the back of River Towers will not save Belle View.

Further concerns:

1. Building a connective wall behind River Towers would require the removal of **hundreds** of trees, as well as the parking lot (behind 6621), the basketball court, and the tennis court, **the very things that have protected us from flooding all these years!** 

Our trees help protect the ground from erosion and flooding. The canopy they provide keeps the ground from being more saturated when it rains. **This is not news!** We are already having success with recently planted trees.

2. Digging into the ground would upset the water table causing the water to seep into our building foundation, **the very thing we want to avoid.** 

#### Alternative Proposal

1. Implement a **massive** tree-planting initiative **now**, at River Towers, in Belle View/ New Alexandria/ Belle Haven and along the GW Parkway. Plant indigenous trees that will thrive in this environment.

2. Replace the old pumps with newer, more efficient ones. Replace old pipes with newer, larger ones that can accommodate more water.

If this is truly about preventing future flooding, please do this **intelligently** and **strategically** in line with current data and in partnership with already existing tools: **our trees.** 

Thank you.



## Roach, Andrew<sup>(b) (6)</sup> USARMY CENAB (USA)

From:	Homer, Allison (b) (6)
Sent:	Thursday, June 16, 2022 10:24 AM
To:	(b) (6)
Cc:	(b) (6) DC-Metro-CSRM-Study
Subject:	[URL Verdict: Neutral][Non-DoD Source] RE: Resilient Fairfax Plan

## Dear(b) (6) :

Thank you for your feedback on behalf of your community! We want to ensure that your valuable comments reach the correct entity. The Tentatively Selected Plan relating to the floodwall is managed by the U.S. Army Corps of Engineers (USACE), rather than our office (OEEC). I have CC'd them here, but to ensure your comments are received (if you haven't already), please reach out to the USACE email address at <u>DC-Metro-CSRM-Study@usace.army.mil</u>.

Our local office's broader initiative, "<u>Resilient Fairfax</u>," is different from USACE's floodwall plan. Resilient Fairfax is broader initiative to make Fairfax County more resilient to a range of climate hazards, including extreme heat, heavy precipitation, and increasingly severe storms. Resilient Fairfax does address inland/urban flooding, natural resources, wetland restoration, and much more. In case you are interested in our office's work, I have included links to Resilient Fairfax resources below.

- Draft Resilient Fairfax Plan
- <u>Resilient Fairfax Climate Map Viewer</u>
- Longer technical reports can be found below, if there is interest in additional detail:
  - o <u>Climate Projections Report</u>
  - o <u>Climate Vulnerability and Risk Assessment</u>
  - o Audit of Existing Policies, Plans, and Programs

We are more than happy to answer any questions about Resilient Fairfax. Questions relating to USACE's floodwall proposal (which is different from Resilient Fairfax) are best directed to USACE.

Thank you again,

Allison

#### Allison Homer, AICP, LEED AP ND

Planner IV, Senior Community Specialist Office of Environmental and Energy Coordination 12000 Government Center Parkway, Suite 533 Fairfax, Virginia 22035 571-460-8385 Follow us on Twitter Follow us on Facebook



lice of Environmental and Energy Coordination

From: OEEC Info (b) (6) Sent: Thursday, June 16, 2022 9:52 AM To: Homer, Allison (b) (6) Subject: FW: Resilient Fairfax Plan

From: (b) (6) Sent: Wednesday, June 15, 2022 10:26 PM To: OEEC Info (b) (6) Subject: Resilient Fairfax Plan

# Dear Office of Environmental and Energy Coordination,

I am writing to you about the Resilient Fairfax Plan. I would like to comment on the proposal by the Army Corps of Engineers (ACE) to build a flood wall around Belle View and River Towers. While I deeply appreciate the resolve of Fairfax County to mitigate potential flooding in our neighborhoods, I am deeply concerned about the specific plan proposed by ACE. This plan has many flaws in it including:

- It does not address stormwater flooding, which has already proven to be a problem in our area.
- It does not address the aesthetic and pragmatic needs of the community and the loss of amenities.
- . The destruction of the property and property values of our neighborhoods
- Destruction of natural resources, including trees and wetlands, which naturally mitigate flooding and global warming, and should enhanced, not destroyed
- How the plan will affect Dyke Marsh and the protected Resource Protection Area designated by Fairfax County.

- How wildlife will traverse the flood wall and levee.
- •
- How the noise from the construction and the proposed pumping station will affect the quality of life of residents and wildlife.
- . The effect of destruction on a historic community that should preserved.

Thank you for your consideration,



From:	Homer, Allison (b) (6)
Sent:	Thursday, June 16, 2022 10:19 AM
To:	(b) (6)
Cc:	DC-Metro-CSRM-Study; (b) (6)
Subject:	[URL Verdict: Neutral][Non-DoD Source] RE: Flood wall plan has many flaws

#### Dear(b)(6),

Thank you for your feedback on behalf of your community! We want to ensure that your valuable comments reach the correct entity. The Tentatively Selected Plan relating to the floodwall is managed by the U.S. Army Corps of Engineers (USACE), rather than our office (OEEC). I have CC'd them here, but to ensure your comments are received (if you haven't already), please reach out to the USACE email address at <u>DC-Metro-CSRM-Study@usace.army.mil</u>.

Our local office's broader initiative, "<u>Resilient Fairfax</u>," is different from USACE's plan. Resilient Fairfax is broader, and does address inland/urban flooding, natural resources, wetland restoration, and much more. In case you are interested in our office's work, I have included links to Resilient Fairfax resources below.

- Draft Resilient Fairfax Plan
  - Resilient Fairfax Climate Map Viewer
- Longer technical reports can be found below, if there is interest in additional detail:
  - o <u>Climate Projections Report</u>
  - o <u>Climate Vulnerability and Risk Assessment</u>
  - o <u>Audit of Existing Policies, Plans, and Programs</u>

We are more than happy to answer any questions about Resilient Fairfax. Questions relating to USACE's floodwall proposal (which is different from Resilient Fairfax) are best directed to USACE.

Thank you again,

Allison

Allison Homer, AICP, LEED AP ND

Planner IV, Senior Community Specialist Office of Environmental and Energy Coordination 12000 Government Center Parkway, Suite 533 Fairfax, Virginia 22035 571-460-8385 Follow us on Twitter Follow us on Facebook



From: OEEC Info (b) (6) Sent: Thursday, June 16, 2022 9:52 AM To: Homer, Allison (b) (6) Subject: FW: Flood wall plan has many flaws

From: (b) (6) Sent: Wednesday, June 15, 2022 10:34 PM To: OEEC Info (b) (6) Subject: Flood wall plan has many flaws

Dear Fairfax County Office of Environmental and Energy Coordination

I am writing to you about the Resilient Fairfax Plan. I would like to comment on the proposal by the Army Corps of Engineers (ACE) to build a flood wall around Belle View and River Towers. While I deeply appreciate the resolve of Fairfax County to mitigate potential flooding in our neighborhoods, I am deeply concerned about the specific plan proposed by ACE. This plan has many flaws in it including:

- • It does not address stormwater flooding, which has already proven to be a problem in our area.
- • It does not address the aesthetic and pragmatic needs of the community and the loss of amenities.
- • The destruction of the property and property values of our neighborhoods
- • Destruction of natural resources, including trees and wetlands, which naturally mitigate flooding and global

warming, and should enhanced, not destroyed

• • How the plan will affect Dyke Marsh and the protected Resource Protection Area designated by Fairfax

County.

- • How wildlife will traverse the flood wall and levee.
- • How the noise from the construction and the proposed pumping station will affect the quality of life of

residents and wildlife.

• • The effect of destruction on a historic community that should preserved.

Thank you for your consideration,





## Dear (b) (6)

Thank you for your feedback on behalf of your community! We want to ensure that your valuable comments reach the correct entity. The Tentatively Selected Plan is conducted by the U.S. Army Corps of Engineers (USACE), rather than our office. I have CC'd them here, but to ensure your comments are received (if you haven't already), please reach out to the USACE email address at <u>DC-Metro-CSRM-Study@usace.army.mil</u>. For additional clarification on the difference between the USACE plan plan and our "Resilient Fairfax" initiative, please see the email attached here.

However, in the spirit of responsive local government and in case it is helpful, we would like to provide clarity on one historical piece that we felt could have been more clearly explained at the public meeting. The tidal surge during Hurricane Isabel was indeed the original source of the flooding in Belle View. River Towers is at a slightly higher elevation than other parts of the neighborhood, which is why it did not flood during Isabel, but is projected to be vulnerable to flooding with a larger storm event combined with sea level rise. The wastewater infrastructure systems were overwhelmed and inundated by the tidal flooding during Isabel, which caused backups and additional flooding in homes. If additional information on Hurricane Isabel, tidal flooding, or how the pump stations and tide gates work to prevent some of the concerns listed would be helpful, I have cc'd Matt Meyers, who was part of the Department of Public Works and Environmental Services (DPWES) response team at the time of the hurricane.

Thank you again,

Allison

#### Allison Homer, AICP, LEED AP ND Planner IV, Senior Community Specialist Office of Environmental and Energy Coordination 12000 Government Center Parkway, Suite 533 Fairfax, Virginia 22035 571-460-8385 Follow us on Twitter

Follow us on Facebook



From: (b) (6)

Sent: Wednesday, June 15, 2022 9:24 PM

To: Homer, Allison (b) (6)

Storck, Dan(b) (6

Subject: Fwd: Opposition to "Tentatively Selected Plan – Alternative 8 – Belle Haven Floodwall and Levee"

Dear Dan Storck and Allison Homer,

Please note well my opposition to "Tentatively Selected Plan – Alternative 8 – Belle Haven Floodwall and Levee" below.

Respectfully,

(b) (6)

----- Original Message ------

From: (b) (6) To: (b) (6)

Date: June 15, 2022 at 9:11 PM

Subject: Opposition to "Tentatively Selected Plan – Alternative 8 – Belle Haven Floodwall and Levee"

To The Fairfax County Office of Environmental and Energy Coordination:

My name is (b) (6) I am a 31-year resident of the (b) (6) building at River Towers. I have a front-row seat to the effects of rain and flooding at River Towers.

This plan is unacceptable for the following reasons:

1. A wall across the back of our property will not stop water, it will cause it to pool. Having nowhere to retreat, the only place for it to go would be the first floor of our building.

2. Water that is pushed back into the creek will have to go somewhere. I don't think our neighbors on Tulane Drive in the Westgrove neighborhood would want it landing in their backyards.

3. Belle View flooded (from Hurricane Isabel in 2003) because their sewage pumps failed.

3. **River Towers Buildings did not flood** in 2003 from Hurricane Isabel. Period. We carry flood insurance on all three buildings in case they ever do. We are fully aware of the risk.

4. Water from the tidal surge (from Isabel) came up the creek and receded later. It was mitigated by our trees and vegetation throughout the back of our property (the picnic grove in particular). The tennis court, basketball court, and the parking lot behind the 6621 building all acted as first lines of defense. The surge did not cause our buildings to flood, **nor did it cause Belle View to flood**.

In short: Walling off the back of River Towers will not save Belle View.

Further concerns:

1. Building a connective wall behind River Towers would require the removal of **hundreds** of trees, as well as the parking lot (behind 6621), the basketball court, and the tennis court, **the very things that have protected us from flooding all these years!** 

Our trees help protect the ground from erosion and flooding. The canopy they provide keeps the ground from being more saturated when it rains. **This is not news!** We are already having success with recently planted trees.

2. Digging into the ground would upset the water table causing the water to seep into our building foundation, **the very thing we want to avoid.** 

#### Alternative Proposal

1. Implement a **massive** tree-planting initiative **now**, at River Towers, in Belle View/ New Alexandria/ Belle Haven and along the GW Parkway. Plant indigenous trees that will thrive in this environment.

2. Replace the old pumps with newer, more efficient ones. Replace old pipes with newer, larger ones that can accommodate more water.

If this is truly about preventing future flooding, please do this **intelligently** and **strategically** in line with current data and in partnership with already existing tools: **our trees.** 

Thank you.

#### (b) (6)

From:	(b) (6)
Sent:	Wednesday, June 15, 2022 10:38 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Fwd: DC Metro CSRM Study

>>> Dear Army Corps of Engineers and Metro Washington Council of Governments:

>>>

>>> I recently learned of the Corps/Council's study of the Fairfax County portion of its coastal flood mitigation study and public comment period. I applaud you for taking proactive steps to reduce flooding and FEMA expenses along the Potomac River. I understand why flooding is a concern.

>>>

>>> As a resident of Belle View adjacent to the GW Parkway, I urge you to consider an alternative to building a flood wall west of the GW Parkway. These are my primary concerns:

>>> —Building a concrete wall would cut off the residents in the three residential neighborhoods adjacent to the GW Parkway — Belle View, River Towers and Belle Haven — from access to the river and the walking and biking trails that run beside it. Access to the river and the trails is one of the main reasons we live here. We live in a dense community that depends on access to open space and nature.

>>>

>>> —This community was designed to be walkable in the 1950s and continues to be one of the few walkable communities in Fairfax County today. Even those who can no longer drive can walk to the Mt. Vernon and Dyke Marsh trails and marina, and the river. How would those of us who don't drive cross the Parkway without a car?

>>> —According to study documents, the plan's low cost seems to be its key feature. Is cost alone driving the Corps/Council's decision? This section of the Potomac river has a rich history and has been a major attraction for residents and visitors alike for decades because of its enduring beauty. Placing a concrete wall between the neighborhood and the river would turn the GW Parkway into a municipal highway.

>>>

>>> — This building project would almost certainly depress property values for the area and reduce the equity in our properties — just as the lack of affordable housing in the county is particularly acute.

>>> —I fear adding this barrier would encourage more speeding and trucks on the Parkway (which are prohibited but rarely stopped). What impact would a concrete barrier have on traffic along this section of the GW Parkway and the County's efforts to control speeding?

>>>

>>> — Finally, I would like to know why the Corps and Council have chosen this approach. Have you considered alternatives to a flood wall, such as the "natural features" you mention in your study?

>>>

>>> I urge you to consider the negative impact building a flood wall west of the Parkway would have on my community and a major Fairfax County resource, and consider alternatives.

>>>

>>> Sincerely,


- >

>>

From:	(b) (6)
Sent:	Wednesday, June 15, 2022 4:27 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Comment on Study

Thank you for briefing the community June 14<sup>th</sup> on the CSRM feasibility study. With regard to the alternatives proposed in the Belle View, New Alexandria, River Towers area, I propose you do nothing more. I prefer the risk of a flood to the flood mitigation wall described in the study. I note that this seemed to be the general sentiment at the meeting. No need to spend any more money studying something that has no community support.

Thank you,





Good morning, (b) (6)

Thank you for your feedback on behalf of your community! We want to ensure that your valuable comments reach the correct entity. The Tentatively Selected Plan is conducted by the U.S. Army Corps of Engineers (USACE), rather than our office. I have CC'd them here, but to ensure your comments are received (if you haven't already), please reach out to the USACE email address at <u>DC-Metro-CSRM-Study@usace.army.mil</u>. For additional clarification on the difference between the USACE plan plan and our "Resilient Fairfax" initiative, please see the email attached here.

However, in the spirit of responsive local government and in case it is helpful, we would like to provide clarity on one historical piece that we felt could have been more clearly explained at the public meeting yesterday evening. The tidal surge during Hurricane Isabel was indeed the original source of the flooding in Belle View. River Towers is at a slightly higher elevation than other parts of the neighborhood, which is why it did not flood during Isabel, but is projected to be vulnerable to flooding with a larger storm event combined with sea level rise. The wastewater infrastructure systems were overwhelmed and inundated by the tidal flooding during Isabel, which caused backups and additional flooding in homes. If additional information on Hurricane Isabel, tidal flooding, or how the pump stations and tide gates work to prevent some of the concerns listed would be helpful, I have cc'd Matt Meyers, who was part of the Department of Public Works and Environmental Services (DPWES) response team at the time.

Thank you again,

Allison

Allison Homer, AICP, LEED AP ND Planner IV, Senior Community Specialist Office of Environmental and Energy Coordination 12000 Government Center Parkway, Suite 533 Fairfax, Virginia 22035 571-460-8385 Follow us on Twitter Follow us on Facebook



From: Meyers, Matthew (b) (6)

Sent: Wednesday, June 15, 2022 11:51 AM

To: Homer, Allison (b) (6)

Subject: FW: Opposition to "Tentatively Selected Plan – Alternative 8 – Belle Haven Floodwall and Levee

From: OEEC Info (b) (6) Sent: Wednesday, June 15, 2022 9:09 AM To: Meyers, Matthew(b) (6)

Subject: FW: Opposition to "Tentatively Selected Plan – Alternative 8 – Belle Haven Floodwall and Levee

FYI -

From: (b) (6) Sent: Monday, June 13, 2022 10:01 AM To: OEEC Info (b) (6) Cc: (b) (6) Subject: Opposition to "Tentatively Selected Plan – Alternative 8 – Belle Haven Floodwall and Levee

To The Fairfax County Office of Environmental and Energy Coordination:

My name is (b) (6) (a gradient in the  $^{(b)}$  (6) building at River Towers. I have a front row seat to the effects of rain and flooding at River Towers (see the attached photos from my window).

This plan is unacceptable for the following reasons:

1. A wall across the back of our property will not stop water, it will cause it to pool. Having nowhere to retreat, the only place for it to go would be the first floor of our building.

2. Water that is pushed back into the creek will have to go somewhere. I don't think our neighbors on Tulane Drive in the Westgrove neighborhood would want it landing in their backyards.

3. Belle View flooded (from Hurricane Isabel in 2003) because their sewage pumps failed.

3. **River Towers Buildings did not flood** in 2003 from Hurricane Isabel. Period. We carry flood insurance on all three buildings in case they ever do. We are fully aware of the risk.

4. Water from the tidal surge (from Isabel) came up the creek and receded later. It was mitigated by our trees and vegetation throughout the back of our property (the picnic grove in particular). The tennis court, basketball court and the parking lot behind the 6621 building all acted as first lines of defense. The surge did not cause our buildings to flood, **nor did it cause Belle View to flood**.

In short: Walling off the back of River Towers will not save Belle View.

Further concerns:

1. Building a connective wall behind River Towers would require the removal of **hundreds** of trees, as well as the parking lot (behind 6621), the basketball court, and the tennis court, **the very things that have protected us from flooding all these years!** 

Our trees help protect the ground from erosion and flooding. The canopy they provide keeps the ground from being more saturated when it rains. **This is not news!** We are already having success with recently planted trees.

2. Digging into the ground would upset the water table causing the water to seep into our building foundation, **the very thing we want to avoid.** 

Alternative Proposal

1. Implement a **massive** tree planting initiative **now**, at River Towers, in Belle View/ New Alexandria/ Belle Haven and along the GW Parkway. Plant indigenous trees that will thrive in this environment.

2. Replace the old pumps with newer, more efficient ones. Replace old pipes with newer, larger ones that can accommodate more water.

If this is truly about preventing future flooding, please do this **intelligently** and **strategically** in line with current data and in partnership with already existing tools: **our trees.** 

Thank you.



 From:
 (b) (6)

 Sent:
 Wednesday, June 15, 2022 11:06 AM

 To:
 DC-Metro-CSRM-Study

 Subject:
 [URL Verdict: Neutral][Non-DoD Source] Here are my comments on the Corps' Draft Integrated Feasibility Report and Environmental Assessment (May 2022), and to object to the proposed Belle Haven floodwall....

#### June 15, 2022

As a former resident of Belle View, and as someone who now lives downstream of the Potomac River near Little Hunting Creek, this comments on the U.S. Army Corps of Engineers' <u>Draft</u> <u>Integrated Feasibility Report and Environmental Assessment</u> (May 2022), and to object to the proposed Belle Haven floodwall until the Corps has documented that they have fully considered alternative storm flood solutions. And given the wide range of questions about the proposed floodwall – and the general opposition expressed at the Corps' public meeting on June 14, 2022 -- this also requests that the Corps extend its June 30 deadline for the submission of public comments, to allow community residents a better opportunity to comment on this important issue.

Page 140 of the Draft Report proposes a Belle Haven floodwall which would be "approximately 6 to 7 ft high on average" and "may permanently obstruct the view of the natural areas located south of Belle Haven and the GWMP [for] the residents of the Belle Haven community." The Draft Report's Appendix G page 1 further describes it as a "levee/floodwall system" of "6,725 total linear feet consisting of 1,900 linear feet of I-Wall, 3,715 linear feet of T-Wall, 400 linear feet of earthen levee, and include five aluminum stop-log closures and two culvert crossings. Pump stations will be located in uplands at the location of the two culvert crossings."

To begin with, it is important to note that when the Corps earlier recommended a combination levee/floodwall around the area, that the "project was not implemented due to community opposition to the project." Draft Report page 76. And it appears that such a proposed floodwall still faces community opposition, given the wide range of questions expressed at the Corps' June 14, 2022 public meeting which I attended.

Yet beside community opposition, I question why the Draft Report did not consider the mitigation impact of the shoreline of the District of Columbia and Prince Georges County, Maryland, which run along the Potomac River and are located just across from Belle Haven. While page i of the Draft Report states that DC and PG County "declined to participate" since they "determined that their needs did not align with the proposed study," I believe that the Corps of Engineers should consider the mitigation impact of their shorelines -- located on the other side of the river from Belle Haven – in a proper assessment of alternative

storm flood mitigation solutions, which could include the creation of enhanced drainage, living shorelines and wetlands.

Indeed, the Corps of Engineers' <u>North Atlantic Coast Comprehensive Study Report</u> [hereafter Study Report], found at <u>https://www.nad.usace.army.mil/CompStudy/</u>, details twenty various risk management measures for coastal communities subject to flooding. Among the twenty measures detailed by the Study Report, I request that the Corps of Engineers reexamine the issue and consider the following risk management measures as alternatives to a Belle Haven floodwall:

#### A. ALTERNATIVE: RETROFIT FOR NON-ELEVATED BUILDINGS.

For a non-elevated structure in the flood zone that is prone to flooding, Study Report #2 recommends building retrofit to address flooding, which "include elevation of a structure or possibly dry flood proofing of a structure. Elevation of a structure is usually limited to smaller residential and commercial buildings. Whether a structure may be elevated depends on a number of factors, including the foundation type, wall type, size of structure, condition, etc."

There are two types of flood proofing for buildings according to the Corps of Engineers' <u>Local</u> <u>Flood Proofing Programs</u> (February 2005) found at <u>https://www.usace.army.mil/Missions/Civil-Works/Project-Planning/nnc/</u>. Dry flood proofing involves "[m]aking the building walls and floor watertight so water does not enter, while wet flood proofing involves "[m]odifying the structure and relocating the contents so that when floodwaters enter the building there is little or no damage."

Dry Flood Proofing deals with "[s]ealing a building to ensure that floodwaters cannot get inside.... All areas below the flood protection level are made watertight. Walls are coated with a waterproofing compound, or plastic sheeting is placed around the walls and covered. Openings, such as doors, windows, sewer lines and vents, are closed temporarily, with sandbags or removable closures, or permanently." Local Flood Proofing Programs (February 2005) page 6.

Wet Proof Flooding addresses "[h]ydrostatic water pressure [which] increases with the depth of water. Depths over 3 feet have been shown to collapse the walls of a typical house. Basements can be subject to 6 or 7 feet of water pressure when the ground is saturated. As a result, watertight walls and floors may crack, buckle or break from shallow surface flooding. One way to deal with this is simply to let the water in and remove or protect everything that could be damaged. ... Wet flood proofing measures range from moving a few valuable items to rebuilding the flood prone area." Local Flood Proofing Programs (February 2005) page 7.

The Corps of Engineers has stated that "flood proofing has also been shown to be less expensive than other flood protection measures." "Flood protection studies in Fairfax County, Virginia, and King County, Washington, reviewed a variety of structural and nonstructural alternatives. Where flood proofing was found to be the most economical solution, the community favored it instead of a more expensive structural project. Fairfax County noted that flood proofing is cheaper than 'chasing the system a mile downstream to fix the overland route.'"<u>Local Flood Proofing Programs</u> (February 2005) page 9.

## B. ALTERNATIVE: DRAINAGE IMPROVEMENTS.

Study Report #15 recommends drainage improvements as an option to address flooding. "A drainage system can carry water away via conveyance systems and, during times of high water, may store water until it can be carried away in storage facilities. Conveyance systems utilize measures such as pump stations, culverts, drains, and inlets to remove water from a site quickly and send it to larger streams. Storage facilities are used to store excess water until the storm or flood event has ended."

Yet has the Corps considered the drainage improvements as an alternative, especially since the District's Clean Rivers Project deals with drainage improvements that are located just upstream from Belle Haven?

We understand that huge deep tunnels have been constructed to address sewage and prevent storm water overflow in the District of Columbia. DC Water has stated that its Clean Rivers Project will reduce combined sewer overflows into the Anacostia and Potomac Rivers and Rock Creek, and it is designed to capture and clean wastewater during rainfalls before it ever reaches the river. Once the Northeast Boundary Tunnel is connected to its other Clean Rivers tunnels, DC Water states that the combined sewer overflows to the Anacostia River will be reduced by 98 percent and that it "will reduce flooding in the neighborhoods it serves by between 7% and 50%."

## C. ALTERNATIVE: CREATION OF LIVING SHORELINES

Study Report #16 recommends the creation of living shorelines as an option to address flooding. "Open and exposed shorelines are prone to erosion due to waves. Living shorelines are essentially tidal wetlands constructed along a shoreline to reduce coastal erosion. Living shorelines maintain dynamic shoreline processes, and provide habitat for organisms such as fish, crabs and turtles. An essential component of a living shoreline is constructing a rock structure (breakwater/sill) offshore and parallel to the shoreline to serve as protection from wave energy that would impact the wetland area and cause erosion and damage or removal of the tidal plants."

Has the Corps considered living shorelines as an alternative? The District of Columbia, Prince George's County and Fairfax County have streams, coves and shorelines that could accommodate living shorelines.

## D. ALTERNATIVE: CREATION OR ADDITION OF WETLANDS

Study Report #20 recommends the creation or addition of wetlands as an option to address flooding. "The dense vegetation and shallow waters within wetlands can slow the advance of storm surge somewhat and slightly reduce the surge landward of the wetland or slow its arrival time. Wetlands can also dissipate wave energy; potentially reducing the amount of destructive wave energy propagating on top of the surge, though evidence suggests that slow-moving

storms and those with long periods of high winds that produce marsh flooding can reduce this benefit."

Has the Corps considered the creation of wetlands or enlargement of existing wetlands like Dyke Marsh Wildlife Preserve as an alternative? The District of Columbia, Prince Georges County and Fairfax County have coves, streams and shorelines which could accommodate the creation or addition of wetlands.

Indeed, it appears that the Corps did not consider increasing the wetlands of nearby Dyke Marsh Wildlife Preserve, which is in need of wetland restoration. Once far larger before dredge mining occurred between 1940 to 1972, Dyke Marsh has only been partially restored under the 2016 George Washington Memorial Parkway's Record of Determination. This Record of Determination provided that the marsh would be restored in a "phased approach up to the historic boundary of the marsh," where "[i]mplementation of the different phases will be dependent upon available funding and fill material," where "[f]uture phases will continue marsh restoration until a sustainable marsh is achieved," where "[t]the outer edges of the containment cell structures will be placed at the park boundary in the river," with "[r]estoration of 16 acres of wetlands south of the breakwater will also be included as an option," and with "[a]pproximately 180 acres of various wetland could be created overall...." 2016 Record of Determination, pages 3-4, found at

https://parkplanning.nps.gov/document.cfm?parkID=186&projectID=20293&documentID=738 50.

# E. A FLOODWALL WILL HAVE A NEGATIVE IMPACT ON FEDERAL PARKLAND, ITS VISITORS AND THE LOCAL COMMUNITY

The Draft Report states that a Belle Haven floodwall may negatively impact on the community's views of the George Washington Memorial Parkway. But the Draft Report, and the Corps comments at the June 14 public meeting, acknowledges that the National Park Service has a negative opinion of a proposed floodwall.

Page 101 of the Draft Report noted that "[d]uring agency coordination meetings, NPS has voiced that they are very concerned with any impact to the parkway, which includes anything that detracts from the character or viewshed of the road and its' historic integrity. This includes changes to views of the river, disconnection from the natural landscape, alterations of other views, impact to the historical character of the road itself, impacts from induced flooding to trails or other NPS resources, and other cultural resource impacts. NPS has been negotiating with the Federal Highway Administration (FHWA) over a <u>7-inch</u> raising of the wall along the parkway, and therefore there is little viability for a floodwall that would be significantly higher than what is currently under negotiation." (emphasis added). As such, these negative impacts to Federal parkland, its visitors and the local community should counsel against consideration of a Belle Haven floodwall.

In conclusion, I request that the Corps of Engineers revisit its Draft Study and more fully consider reasonable risk management measures instead of the proposed Belle Haven floodwall

as well as more fully consider the floodwall's negative impact to Federal parkland, its visitors and the local community. I also request that the Corps extend its June 30 public comments deadline.

The Corps' reexamination is consistent with 40 CFR 1502.14(a)(b) which requires that "[t]he alternatives section should present the environmental impacts of the proposed action and the alternatives in comparative form based on the information and analysis presented in the sections on the affected environment and the environmental consequences. In this section, agencies shall: (a) Evaluate reasonable alternatives to the proposed action, and, for alternatives that the agency eliminated from detailed study, briefly discuss the reasons for their elimination. (b) Discuss each alternative considered in detail, including the proposed action, so that reviewers may evaluate their comparative merits...."

Respectfully submitted,



From:	(b) (6)
Sent:	Wednesday, June 15, 2022 9:51 AM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Comments on the Belle Haven Floodwall Proposal.

Hello,

I am a resident of the Belle Haven community, and attended yesterday's public meeting (6/14/2022) on the construction of a floodwall encircling the Bell Haven neighborhood, and feel this project needs to be re-evaluated and re-presented to address all comments provided by the public during that forem. In general, I am in opposition to the project as presented and think it should not be considered the preferred alternative.

I recommend providing additional public meetings that include:

- Graphics and 3D rendering of what the wall will look like. The report included a rendering of a brick wall that Fairfax County developed from a 2009 study. however the report notes the wall would be a Concrete I-wall and T-wall. What does that look like? what does it look like along the entire proposed alignment?
- 2. What properties would be required? have the property owners agreed to it being built on their land? what will the County's approach be to owners who refuse?
- 3. What is the impact on home values of erecting a 6-7 ft wall around the entire eastern, northern, and southern bounds of the community? environmental impacts. real estate impacts. public use impacts.
- 4. what is the max height of the wall?
- 5. Please explicitly state that the County's idea of adding a "chained link fence to the top of the wall to discourage children from climbing the wall" will NOT be entertained. I'm not interested in living in a prison complex.
- 6. Please address the risk the wall will present to public health (attractive nuisance, roadway site lines, increased heat island effect since we're cutting off air circulation, impact of wetlands/swampy conditions that promote mosquitos since we're creating a bathtub that will prevent natural sheet flow during rain events from flowing towards the river.
- 7. What is the impact on air circulation with the community?
- 8. what properties would be attained by eminent domain? what commercial properties would be removed (i.e. gas station?). how does the army corp propose to replace all lost amenities (access to the GW park that aren't vehicle specific, neighborhood mechanic and gas service station, etc).
- 9. detailed information on the non-structural alternatives understanding that a 7 ft floodwall is how to reduce risk of the 100-year flood +1.75 ft of , but what would more natural approaches (shoreline restoration, wetland development, etc) provide?
- 10. construction schedule is for 4 years with 12-hour days. Please detail out the assumptions behind this estimate. It would be an enormous burden on the community, and doesn't seem realistic.
- 11. what is the impact on wildlife for construction of a 2500 ft wall? we have a large population of foxes who live within the area. what will happen to their natural ability to move through the area.
- 12. how will large rain events drain from the area? Not all flow goes to the two streams. are you creating a bathtub?
- 13. open negotiations and public forums with National Park Service on utilizing park land to mitigate the risk of flooding. this seems the only option that doesn't severly and negatively impact the community. I don't think this project can or should move forward without construction on federally owned NPS land being the preferred alternative. utilizing the roadway and/or adjacent land east of the road to create a natural berm should be evaluated.

The above only includes a fraction of the public comments provided verbally during the public meeting on 6/14/2022. All comments must be addressed and re-presented to the community before any project can move forward. If the USAC

cannot/will not address all comments, than please cancel further development of this alternative as it is a non-starter as presented and should not continue.

Thank you, <sup>(b) (6)</sup>

From:	(b) (6)
Sent:	Tuesday, June 14, 2022 7:38 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Public Comment
Categories:	Green Category

Dear USACE,

My name is (b) (6) and I am a condo owner at Belle View. Thank you for coming to our community to discuss the wall.

While it would be ideal to have a berm/wall on the east side of the GW Parkway, I understand that the terrain and environmental analysis points to a wall west of the GW Parkway.

I fully support the construction of a wall in our neighborhood.

Sincerely,

#### (b) (6)

Sent from my iPhone

#### Roach, Andrew <sup>(D) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Tuesday, June 14, 2022 3:45 PM
То:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Metro DC Coastal Storm Risk Management Study

To whom it may concern,

The current ACOE plan for Belle Haven is not the right plan. What the ACOE purposes fails to completely address, and could negatively affect: the marsh, the area environment (including tree loss), and property values. This seems like a bad move, as a better thought-out plan could accomplish the stated goals while limiting its current negative effects.

I believe a Belle Haven / ACoE / NPS collaboration should be formed, toward a solution that works with the environment rather than against it. Further, a minimum four-fold increase in the Belle Haven budget should be included to address many of the issues outlined below. Additionally, for the ACoE to quantify tree removal, and to budget and call out the additional cost of lower property values affected by the current poor-quality design, and to include alternate designs with lower property-value impact.

Finally I would like to note that both the County of Fairfax and the Fairfax County Board of Supervisors offered project support for a specific plan without consulting with the residents affected by the flood wall.

#### **GLOBAL WARMING**

"resist flooding" as a concept is likely not the right move in order to protect both the marsh and the flood area. There are countless ideas that don't involve a flood wall that might work. If you only considered the needs of the marsh, for instance, the solution is to abandon human settlement and let nature take over the flood area. Though it must be said that without serious money and serious public support this scenario likely won't happen.

I recall during the previous floodwall public forum several years back that an improved engineered path could be found if NPS was a cooperative party. ACoE should study alternates that include those alternate designs as if NPS was a partner. If positive public support could be found for alternative(s), additional leverage could encourage NPS to come to the table.

#### THE FLOODWALL DESIGN

\_ the current iteration is an unimaginative eyesore at best. At worst it will bring down local property values, which the ACoE study should be required to consider and to highlight in its overall costs.

\_ wall alignments need tweaking to optimize the design. Mostly to get rid of one unnecessary gate near the River Towers parking lot, which will require going through the tennis courts and part of the southeast parking lot, but also to push the wall further away from the 6631 building.

\_ If River Towers retains property on the south side of the wall, the existence of one gate as a potential accessible passage is likely going to trigger interest from the DOJ. The design will likely require multiple accessible points to move people over or through the wall to retain access to our property.

\_ To address the three points above, negotiate an offer with the River Towers residents to abandon the south-of-thefloodwall property in exchange for a number of concessions: wall realignments, replacement of amenities, and funding for landscape redesign and site improvements throughout the affected RT property. A good designer, with the right funding and a positive public/government collaboration, could actually turn the negative wall into a positive thing.

\_ A further improvement would be to provide significant funding to turn the wall into a world-class award-winning design gesture toward environmental sustainability that not only protects and improves the marsh but also boosts property values. Treat the wall and the community partnership as a model for the rest of the US.

\_ The current study fails, to an almost hilarious degree, to quantify the effect this will have on local trees. The ACoE should quantify the number of trees to be eliminated during construction, and to include funding for a 2:1 tree replacement program (i.e. plant twice as many trees within the Belle Haven area as are displaced by the wall).

Regards, (b) (6)



From:	(b) (6)
Sent:	Tuesday, June 14, 2022 1 <u>:40 PM</u>
To:	DC-Metro-CSRM-Study; (b) (6)
Subject:	[Non-DoD Source] Proposed Flood Wall - Belle Haven Road, Belle View, and behind River Towers

To whom it may concern:

I am a resident of River Towers on Wakefield Drive. I have lived here since 1995 and would like to comment on the proposed flood wall.

First of all and what will become very obvious, I am against a wall encasing the New Alexandria, Belle View, and River Towers' areas. Here are my main concerns:

1) It is already hard enough to get out onto the GW Parkway. How will we do that with a wall obstructing our view up and down the Parkway?

2) In the event of a major storm, how does water escape this area? Storm drains area already over taxed in a storm. If that water is boxed in, they will be overcome even more.

3) Has the Army Corps of Engineers considered doing something like the New Bedford, MA. Hurricane Protection Wall? It just seems to make more sense to build something like this at a narrow point in the Potomac further downstream than to try to wall off a few small neighborhoods. This way, Alexandria and Georgetown would be protected as well from a storm surge.

4) Now to River Towers in particular: The proposed wall would destroy our view of Dyke Marsh West and therefore, would destroy our property values. We would lose access to our picnic grounds and our garden plots - two major amenities currently enjoyed by many. And, building a water pumping station on our property would also change the beautiful natural setting currently enjoyed by all 525 condos.

5) Has anyone thought about restoring Dyke Marsh West along with the major restoration that is occurring in the main part of Dyke Marsh? This area used to be a full, thriving marsh. Now it is barely a stream because of the runoff from the culvert blowout that occurred up the hill from Ft. Hunt Road. You can still see the silt pouring into the marsh on a stormy day. Please let me know if you would like pictures of what the marsh used to look like (and I mean 5 years ago - not 20) or if you would like to see pictures of the silt infiltrating the marsh.

6) I am curious what will happen to rainwater coming down the hill and across Ft. Hunt Road and the dog park. Where is that water to go? Water literally cascades across that area in a

storm. If you are going to build 3 sides to a box, finish it off and protect from uphill. (Another preposterous idea...)

7) How will the gates go up or be put into place? I am assuming there are gates at the intersection of Belle View Blvd and GWP.

8) Oh, and one other thought: River Towers did not flood when Isabel came through. I was here for it. We were high enough that we escaped. We don't want a wall around us. Maybe this is shortsighted and/or meanspirited but there has to be another way. Why ruin the reason we live here? The nature, the view, the marsh.

I hope you will reconsider your suggestion of encapsulating our neighborhood. There has to be other alternatives: improve/enlarge the storm drain system, restore Dyke Marsh (both parts), a storm wall further down the Potomac, etc.

If you have any questions or need to talk to me, email is the best - (b) (6)

Thanks very much for your time and consideration.

Sincerely,



From:	(b) (6)
Sent:	Wednesday, June 8, 2022 12:56 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Flood wall in Belle View

Hi,

I am a resident of River Towers, in the Alexandria section of Fairfax County. I understand that there is a potential plan to build a flood wall and levee on our property. Could you please tell me a few more details about it? The last time we had significant flooding in this area, it was because a pumping station failed and flood water came up through the sewer system. How will a wall address this problem? Also, how will the wall affect access to River Towers amenities, how can it be build in a no-build zone (due to the wetlands), and how will it affect wildlife?

Thank you for your time



From:	(b) (6)
Sent:	Monday, June 6, 2022 6:42 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] DC Metro CSRM Study - virtual option for Belleview meeting

Good evening:

We live in New Alexandria and would like to participate in the meeting about the Belle Haven/New Alexandria plan but do not attend events where people are not masked and will be sitting closely. We had thought we could attend the virtual meeting on the 16th and now understand that meeting will focus on the Arlington proposal. Please offer a virtual option for the meeting on the 14th. There are many older people in this neighborhood who continue to take a higher level of precaution than the general community. Otherwise, please advise everyone you will be requiring masks.

Thank you



#### Roach, Andrew <sup>(D) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Monday, June 6, 2022 3:53 PM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] DC Metro CSRM Study

I a a longtime resident of New Alexandria (since 1980) which you call Belle Haven in your flood mitigation proposals. I have several questions that I could not find answers to in your lengthy report. We have lived here through Hurricane Isabel and through the last round of proposals for flood mitigation during the Obama administration.

Have you assessed the loss of property value from erecting a wall around our neighborhood, or how people who live on Bouleveard View will be able to access their homes during construction.

Earlier proposals had a wall running through the front yards of homes on Boulevard View. I cannot tell from your design if the wall is intended to run on park service land on the parkway side of Boulevard View and will that wall be close to the road or closer to the Parkway?

Finally, the current design runs through the backyards of homes in the 6300 block of Tenth street. Do you intend to exercise eminent domain so you have access to those backyards in case the residents do not want to grant an easement? One proposal several years ago had the wall coming around boulevard view to tenth street and then down tenth street in front of those homes as several residents said they would not grant an easement.

Why aren't you proposing a flood wall down the middle of the Parkway which would have the least impact on the homes in our neighborhood. There is land available and with the current NPS speed mitigation efforts, there is plenty of room, especially if the park service extends the single southward lane from Belle Haven Road south. The Park Service intends to do major work on this stretch of the Parkway in a few years. It seems to me you could coordinate with them to have a flood mitigation project that is much less deleterious to the quality of life in our neighborhood.

Finally, there are no safe crossings on the parkway for people trying to get to the Marina or the park. A flood wall without any accessible crossing points will complicate efforts for pedestrians, especially because the NPS refuses to give us a traffic light at Belle Haven road and the parkway. It is sometimes safer to cross south of Belle Haven Road with all the turning cars than it is at the intersection and a wall would eliminate that option.

Thank you. I look forward to your virtual meeting on the 16th where I hope these questions are addressed.



## Roach, Andrew <sup>(b) (6)</sup> USARMY CENAB (USA)

(b) (6)
Monday, June 6, 2022 2:57 PM
DC-Metro-CSRM-Study
(b) (6)
[Non-DoD Source] Proposed Flood Wall from Belle Haven area plus
Green Category

Dear Staff:

I am not opposed to this construction as it will prevent future floods. Thank you.

#### (b) (6)

From:	(b) (6)
Sent:	Monday, June 6, 2022 10:14 AM
To:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] No flood wall in Belle View!

Hello, I'm writing to express my objection to a flood wall from Belle Haven extending south along Boulevard View and west behind River Towers. The existing drainage and previous flooding mitigation efforts make this flood wall unnecessary. It would ruin the nature of the community, which no longer has serious flooding issues, and would be detrimental to the character of the neighborhood.

I sincerely hope you reconsider this proposal, which was unanimously rejected by the Belle View, New Alexandria, River Town and River Towers communities in 2015, and continues to be opposed by those communities today.



From:	(b) (6)
Sent:	Monday, June 6, 2022 8:55 AM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Comments on CSRM Feasibility Study

Dear Sir/Madam:

We are writing in response to the proposed flood wall included in the feasibility study to reduce coastal flood risk.

Our residence is at (b) (6) , and we will be directly affected by the proposed flood wall, which will be directly in front of our apartment. Depending on the design and location, the flood wall could potentially have significant negative impacts on quality of life and the value of real estate in the area affecting people's livelihoods. We would appreciate answers to the following questions:

1. How tall will the proposed flood wall need to be?

2. What will the proposed flood wall look like?

3. Why can the proposed flood wall not be built on the east side of the GW Parkway, which is federal land, along with flood gates to control water coming up rivers? Doing so would allow the wall to be obscured better, allow for maintenance without interfering with residences, and increase protection of the GW Parkway as an emergency access route during storm events.

While we fully understand and appreciate the need to study and take mitigating action where appropriate, we need far more information from the US Army Corps of Engineers before we can support this project and avoid potential litigation.

Sincerely,



From:	(b) (6)
Sent:	Monday, June 6, 2022 7:43 AM
To:	DC-Metro-CSRM-Study
Subject:	[URL Verdict: Neutral][Non-DoD Source] Coastal storm risk management fleasabiltiy study
Categories:	Green Category

Hi, I am owner in (b) (6) and just wanted to log my opinion.

I am sure you're going to get a lot of Not In My Backyard and it's going to be really ugly, but in my opinion, it's necessary no matter the blowback. I have neighbors who went through the big flooding here years ago and I know that fear of that happening again and living under the treat of flooding is not pleasant.

I see there are glass flood/sea walls and I think people would find those just a bit more acceptable if possible.

#### thank you



From:	(b) (6)
Sent:	Saturday, June 4, 2022 9:27 AM
To:	DC-Metro-CSRM-Study
Cc:	(b) (6)
Subject:	[Non-DoD Source] Belle View Flood Wall

This is in regard to the upcoming public meeting scheduled for June 14, 2022 regarding the proposed construction of a flood wall along the Potomac River in the Belle View, New Alexandria and River Towers area of Fairfax County. Unfortunately, I will not be able to attend, but I wanted to pose the following questions.

The prospect is distressing, but so is the likelihood of catastrophic flooding in this area. I understand I don't have the benefit of the Army Corps' presentation, but these are my questions. 1) Would it be possible to make a flood wall retractable? By that I mean, the wall would be buried underground and out of sight most of the time. However, it would be raised and form a barrier against the water in the event of possible flooding. I've seen such walls along rivers in Europe. I think I remember seeing such a wall in Cologne, Germany.

2) Why would the wall be on the west side of the Parkway? Wouldn't it make more sense to make it on the east side to protect the Parkway?

Thank you for your efforts, distressing as the prospect of this wall is.

#### (b) (6)

From:	(b) (6)
Sent:	Thursday, June 2, 2022 10:03 PM
То:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] Rejecting Flood Wall South along Belle View Boulevard

To whom it may concern:

I vehemently reject and strongly oppose your study and proposal to build a flood wall/berm located from Belle Haven, extending south along Belle View Blvd and than west behind River Towers.

The construction of such kind would not only destroy the harmonious picture of this community but also diminish the quality of life of all residents.

In contrast to you I grew near a wall, in Germany. I know what I am talking about. You apparently not so much.

I urge you not to build such flood wall/berm at all.

And if for some unconceivable reason you cannot let go of your desire - need there is not - to build such wall/berm, I urge you to build such wall on the eastern side of George Washington Parkway - without increasing taxes and dues of any kind, and without impacting the wildlife and scenery. A wall has no place here.

No one wants the wall, no one needs the wall.

And people like you, who do not live in these above-mentioned communities, must have NO say in building such wall/berm. You do/will not live here to see such abomination on a daily basis. I do.

Obey the resident and tax payer,



#### Roach, Andrew <sup>(D) (6)</sup> USARMY CENAB (USA)

From:	(b) (6)
Sent:	Thursday, June 2, 2022 4:45 PM
То:	DC-Metro-CSRM-Study
Subject:	[Non-DoD Source] DC Metro CSRM Study

Dear Army Corps of Engineers and Metro Washington Council of Governments:

I recently learned of the Corps/Council's study of the Fairfax County portion of its coastal flood mitigation study and public comment period. I applaud you for taking proactive steps to reduce flooding and FEMA expenses along the Potomac River. I understand why flooding is a concern.

As a resident of Belle View adjacent to the GW Parkway, I urge you to consider an alternative to building a flood wall west of the GW Parkway. These are my primary concerns:

-Building a concrete wall would cut off the residents in the three residential neighborhoods adjacent to the GW Parkway - Belle View, River Towers and Belle Haven - from access to the river and the walking and biking trails that run beside it. Access to the river and the trails is one of the main reasons we live here. We live in a dense community that depends on access to open space and nature.

-This community was designed to be walkable in the 1950s and continues to be one of the few walkable communities in Fairfax County today. Even those who can no longer drive can walk to the Mt. Vernon and Dyke Marsh trails and marina, and the river. How would those of us who don't drive cross the Parkway without a car?

-According to study documents, the plan's low cost seems to be its key feature. Is cost alone driving the Corps/Council's decision? This section of the Potomac river has a rich history and has been a major attraction for residents and visitors alike for decades because of its enduring beauty. Placing a concrete wall between the neighborhood and the river would turn the GW Parkway into a municipal highway.

-This building project would almost certainly depress property values for the area and reduce the equity in our properties - just as the lack of affordable housing in the county is particularly acute.

-I fear adding this barrier would encourage more speeding and trucks on the Parkway (which are prohibited but rarely stopped). What impact would a concrete barrier have on traffic along this section of the GW Parkway and the County's efforts to control speeding?

-Finally, I would like to know why the Corps and Council have chosen this approach. Have you considered alternatives to a flood wall, such as the "natural features" you mention in your study?

I urge you to consider the negative impact building a flood wall west of the Parkway would have on my community and a major Fairfax County resource, and consider alternatives.

Sincerely,

#### (b) (6)