



United States Department of the Interior

NATIONAL PARK SERVICE

National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO:

January 16, 2025

Yvonne Weight Callahan
President
Old Town Civic Association
P.O. Box 1213
Alexandria, VA 22313
yvonneweightcallahan@gmail.com

[Delivered via email]

Dear Ms. Callahan,

I am writing in response to your December 19, 2024, email to National Park Service (NPS) Director Chuck Sams regarding the Alexandria Waterfront, and specifically the proposed pumping station associated with the Waterfront Flood Mitigation Project. Your inquiry has been forwarded to me for a response.

Due to the 1981 settlement agreement between the City of Alexandria (City) and the United States, the NPS has been working with the City since 2015 on the development of the waterfront implementation plan. The City has been open and transparent in the planning and design development of the proposed Waterfront Flood Mitigation project through electronic and online communication, multiple open public meetings, and additional private meetings with stakeholders. We agree with the City that meeting the project's goals is necessary for public health and safety.

The pumping equipment needed to mitigate flooding is substantial, and sufficient space must be provided near the waterfront. The project's objective has been to design a pump station that meets the technical requirements while minimizing impacts to public use and enjoyment of the waterfront to the extent practicable. The proposed single-station approach will preserve more than twice as much usable area of Waterfront Park for public use and recreation. Notwithstanding its height, the NPS believes the currently proposed design best meets the objective of minimizing impacts to public spaces on the waterfront to the extent practicable.

While the planning process has been lengthy, the City has worked closely with the NPS and the community to develop and evaluate alternative locations for the proposed pump station. However, it has been determined that the proposed location at Waterfront Park is the only viable location given the technical, engineering, budgetary, and timing constraints for this vital public safety project. This conclusion is consistent with the general location indicated in the City's long-standing Waterfront Plan, adopted in 2014.

The City has thoroughly evaluated reasonable alternatives, including the alternatives proposed by the Old Town Civic Association which included alternate sites for the pump station, including 1 Prince Street,

110 South Union Street, 2 and 6 Prince Street, and the gravel parking lot located at Point Lumley Park. The results of the evaluation determined that both the 1 Prince Street and 110 S. Union Street locations could potentially be technically feasible but posed significant challenges that made them infeasible overall. These alternatives are not practicable because the due diligence process, uncertainty and timeline associated with the acquisition of private property, the design and approvals process, and the demolition and redevelopment would add considerable additional costs far exceeding the approved project budget, significantly increase risks to the project and to adjacent structures during construction and cause major delays to the project.

The location proposed at 2 and 6 Prince Street was deemed not technically feasible as the potential development site was determined to be too small. Additionally, use of the site is constrained by adjacent buildings, overhead power lines and transformers, and right-of-way constraints.

The alternative Point Lumley Park site was preliminarily determined to be potentially technically feasible but required additional environmental, structural, and geotechnical work. This alternative would not reduce the impacts to waterfront lands covered by the Settlement Agreement and other deed restrictions and is not consistent with the long-standing 2014 Waterfront Plan for Point Lumley Park or in alignment with the plans for garden funded by a donor's financial bequest to the City for that vicinity.

The results of the evaluation were summarized in a memo dated September 4, 2024, which was shared with the City Council on September 17, 2024, and with the Waterfront Commission on September 19, 2024. These findings were then presented publicly at the October Waterfront Commission Meeting (October 15, 2024) and we understand, were discussed directly with representatives of Old Town Business and Old Town Civic Association.

In case you are not aware, a summary of the engineering and risk analysis is available on the project website, here: https://www.alexandriava.gov/sites/default/files/2024-10/2024-09-04_wfi-memo-alt_station_0.pdf

The NPS has concluded that the current proposal by the city meets the needs for the Waterfront Flood Mitigation project and minimizes impact to the public spaces on the waterfront to the extent practicable. The restrictions at issue here are contained in a 1981 Deed, which expressly incorporates the 1981 Stipulation of Settlement between the City and the United States. Paragraph 6 of that Stipulation of Settlement provides that the City and the United States may modify property interests when needed. Therefore, the NPS will continue to work with the City to finalize the design and to modify the deed to allow for the new structure.

If the Association has identified an additional alternative, not previously evaluated by the City, that would meet the project goals/requirements, is feasible and constructable with less impacts to the public spaces on the waterfront, the NPS would be interesting hearing about that. Please reach out about this or with any questions to the NPS Associate Regional Director for Lands and Planning, Ms. Tammy Stidham, at Tammy_Stidham@nps.gov or (202) 619-7474.

Sincerely,

Jennifer T. Nersesian
Regional Director
National Capital Region