



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
700 George Washington Memorial Parkway
McLean, VA 22101

JUL 29 2022

IN REPLY REFER TO:

1.A.1 (GWMP)

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

Dear Sir/Madam:

The National Park Service (NPS) appreciates the opportunity to review and provide comment on the Metropolitan Washington District of Columbia draft Integrated Feasibility Report and Environmental Assessment (EA) prepared by the U.S. Army Corps of Engineers, Baltimore District (USACE). The purpose of the study is to evaluate the feasibility of federal participation in the implementation of solutions to reduce long-term coastal flood risk to vulnerable populations, properties, infrastructure, and environmental and cultural resources within the Middle Potomac River watershed of Northern Virginia.

The USACE and the NPS have been discussing the potential for this project for many years and during those discussions, the NPS has consistently expressed concern related to the effect of this project on NPS resources located within the George Washington Memorial Parkway (GW Parkway), a listed property in the National Register of Historic Places. The project alternatives would potentially impact GW Parkway resources in two locations, along Reagan National Airport and the Belle Haven area, where levee and floodwall infrastructure are proposed.

Reagan National Airport

The proposed action for the airport property includes raising the perimeter road of Reagan National Airport to be on an earthen levee topped with heavy duty pavement. The study states that two areas have limited land available to raise the road (along the water's edge south of the airport and along GW Parkway), where a floodwall would need to be constructed and that the Mount Vernon Trail (NPS resource) may be affected. NPS property for the GW Parkway is located on the west side of the airport property. The EA does not offer the location of such floodwalls; therefore, it is unclear if there are impacts to NPS resources.

Belle Haven

The NPS understand that the proposed action within this feasibility study includes a floodwall at Belle Haven that would be constructed just north of Belle Haven Road from Barrister Place to

INTERIOR REGION 1 • NORTH ATLANTIC-APPALACHIAN

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS,
NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, VERMONT,
VIRGINIA, WEST VIRGINIA

10th street, with a closure structure at 10th Street and at the GW Parkway. The referenced floodwall would run along the west side of the GW Parkway and would then curve around Boulevard View to 10th Street. The EA does not offer the precise location of such floodwall or closures; therefore, it is unclear if there are impacts to NPS resources,

For the NPS to provide meaningful comment, we would need to better understand the potential to impact NPS resources. If there is infrastructure proposed on the GW Parkway or if GW Parkway land would be temporarily required for the construction of infrastructure, then the EA would need to be explicit regarding what infrastructure, where it would be located, and how much land is required. Furthermore, the amount of impacts to NPS resources would need to be evaluated. As written, the EA is insufficient to adopt should the NPS be required to make a federal decision on the use of its properties.

If there is no new infrastructure proposed on the GW Parkway and no land temporarily required for the construction of infrastructure, then the only impact of concern would be related to viewshed due to construction adjacent to the GW Parkway. This construction has been evaluated in the EA but no determination as to effect was made. Under these circumstances, the NPS would still wish to continue as a Consulting Party under Section 106 of the National Historic Protection Act since there appears to be the potential to effect viewsheds of importance to the NPS.

The NPS continues to be concerned with impacts to NPS resources but remains open to ongoing coordination with the USACE to explore potential measures that limit the effects of coastal flooding. Specifically, the NPS would like USACE to consider how Dyke Marsh might assist with mitigations to flooding impacts in the Belle Haven area.

Thank you for the opportunity to provide comments. For further coordination please contact Resource Management Division Manager, Maureen Joseph, at 703-289-2512 or (b) (6) or me at (b) (6) or 703-289-2511.

Sincerely,

(b) (6)

Charles Cuvelier
Superintendent