



FAIRFAX COUNTY PARK AUTHORITY



July 31, 2022

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SUBJECT: EA-ACOE IGR-2022-00006, Coastal Storm Risk Management (Army Corps of Engineers), Metropolitan Washington District of Columbia Draft Integrated Feasibility Report & Environmental Assessment

The Fairfax County Park Authority (FCPA) has reviewed the Metropolitan Washington District of Columbia Draft Integrated Feasibility Report & Environmental Assessment (DIFR & EA). The DIFR & EA identifies the Tentatively Selected Plan (TSP) as Alternative 8, which includes plan components showing the southern end of the “Belle Haven Floodwall and Levee” extending approximately 100 linear feet into FCPA’s Westgrove Park.

If this levee is constructed as shown in the TSP, Westgrove Park will experience direct impacts of lost land, recreation facilities, public access, vegetation, and habitat, increased storm water discharge, invasive species, as well as wildlife habitat quality impacts. The DIFR & EA includes limited information regarding Westgrove Park in the analysis of environmental effects and consequences. FCPA requests further coordination and consultation to ensure impacts to Westgrove Park by the proposed project are avoided, minimized, or mitigated.

Effort should be made to minimize the impact to parkland from clearing and land disturbance. Mitigation should occur on parkland to the greatest extent possible. Land disturbance from stormwater projects, including levees typically results in an increase in invasive species coverage without proper treatment prior to and following construction. To minimize the impacts of this project to parkland and the native habitats of Fairfax County, all vegetation impacted by this project should be replaced with only locally common species native to Fairfax County, following county standards. This includes woody plants and shrubs, as well as seed mixes for short and long-term soil stabilization.

1. Woody planting specifications should include at least a 4-year warranty with three annual monitoring events, annual control of non-native invasive plant species by a licensed contractor, and annual replanting to maintain a minimum 80% survival rate of all woody plantings.
2. Shrubs should be planted around the periphery of the levee structure to provide increased bank stabilization.



3. For restoration on parkland, herbaceous planting specifications will be provided by Fairfax County Park Authority. Ideally, the same native seed mix would be used along the entire project length to reduce invasive plant impacts throughout.

FCPA is concerned that further engineering requirements of this project will pose additional adverse impacts on parkland than is currently known. To accurately determine the extent of the proposed impacts to Westgrove Park and the appropriate amount of mitigation, a full plan set is needed. This plan set will need to show engineered alignments of the levee, stream/wetland restoration, tree canopy impacts, stormwater management, utility relocations, and limits of disturbance. The plan set will also need to show all construction access routes, necessary staging areas, land takings, permanent and temporary easements, revegetation plantings, and replacement of all impacted park signage, fences, and recreation features. All temporary and permanent easements, takings, and maintenance agreements will need to be negotiated at a later date, based on additional engineering.

Westgrove Park, including the proposed location for the end of the levee, may be the location of a demolished Wastewater Treatment Center, elements of which may still be present under potentially unstable soils. Further site analysis is recommended to verify the site's former use and to determine appropriate geotechnical requirements.

Since this land is owned by the Park Authority, the applicant must first acquire a Right of Entry License, Easement, and/or Construction Permit prior to performing any site work or studies on parkland. This includes, but is not limited to surveying, test boring, wetland flagging, clearing, grading, geotechnical studies, utility relocations, staging, construction, or any other related activities. Land rights on Park Authority owned property are requested from the Easement Coordinator, Fairfax County Park Authority, Planning and Development Division, 12055 Government Center Parkway, Suite 421, Fairfax, Virginia 22035. The main telephone number is (703) 324-8741. Please advise any contractors and subcontractors of this requirement.

A maintenance agreement will be needed for all areas and facilities within the easements conveyed by the Park Authority to the applicant relating to the construction, operation, and maintenance of the levee and related infrastructure. Such maintenance shall be as required with the standard maintenance terms set forth in such easements and by applicable governmental requirements relating to the operation of the levee. To allow staff an adequate time to distribute, review, and compile comments, the Park Authority requests that cases be sent directly to the Park Authority Planning and Development Division, with a minimum of 30 days to review each submission.

The provided report references consulting with Alexandria Parks and Recreation, the National Park Service, as well as the Fairfax County Department of Public Works and Environmental Services, Fairfax County Department of Planning and Development (Planning and Evaluation Branch), and Fairfax County Fire and Hazardous Materials Bureau. While there is a reference to the Westgrove Park Master Plan, there is no mention of consultation with FCPA. Since the proposed levee impacts an FCPA park, the applicant will need to coordinate with the FCPA Planning and Development Division.

Table 2-9. Recreation Amenities in the Study Area on page 35 of the DIFR & EA, lists several nearby parks including Mount Vernon District Park. However, it does not list Westgrove Park,

which will contain part of the proposed levee. Please include Westgrove Park in Table 2-9 and include the potential impacts to Westgrove Park in the analysis for this project.

Page 53 of the Draft Integrated Feasibility Report and Environmental Assessment states that “Fairfax County constructed a levee along Cameron Run, in front of Huntington Park.” Please update this reference to say “... through Huntington Park.”

Due to the above listed concerns, FCPA staff would like to review all future documents and plans at the earliest opportunity as the project progresses. Thank you for the opportunity to comment on this DIFR & EA report. We look forward to participating in the study as it moves forward. The Park Authority’s point of contact for this project is Andy Galusha, Park Planner, who can be reached at 703-324-8755 or at (b) (6).

Sincerely,

(b) (6) Sam Hudson
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approved this document
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