

S. M. C. L.  
4/06/16

## United States Department of the Interior

NATIONAL PARK SERVICE  
George Washington Memorial Parkway  
c/o Turkey Run Park  
McLean, Virginia 22101

IN REPLY REFER TO:  
9.B. (GWMP)

William Skrabak  
Deputy Director, Infrastructure & Environmental Quality Division  
Department of Transportation & Environmental Services  
City of Alexandria  
301 King Street  
Alexandria, Virginia 22314

Mr. Skrabak,

On December 16, 2015 my staff had a productive meeting with you and your team regarding the City of Alexandria's proposed Combined Sewer System and long term control plan. During that meeting, your team presented likely regulatory changes to sanitation standards that affect the Commonwealth of Virginia and the City of Alexandria. As a result, the city is undertaking an effort to better manage waste and storm water overflows. The city's proposed method for improving this management is the construction of a tank facility to manage combined sewer overflows. The team presented four alternatives for tank facility locations in and around the Jones Point Park area. Any proposed tank facility would include access for maintenance and odor abatement.

During the discussion, National Park Service (NPS) staff representing the park and the regional office were able to review four tank facility concepts at four locations. The city staff explained that all concepts worked equally well from a technical perspective, and increased the storm and wastewater capacity to meeting new regulatory standards. The different locations proposed include multiple landowners, different construction costs, and varying access for construction and maintenance activities. The NPS staff has discussed relative benefits and concerns specific to each alternative concept.

#### Alternative 1

Based on the presentation, we believe that Alternative 1 is located on private property. It is acceptable to park management that the facility be constructed off NPS lands. The George Washington Memorial Parkway may need to issue Special Use Permits or Right-Of-Way Permit to provide for construction, and access for regular maintenance. The issuance of a Permit would constitute a Federal action and require a compliance process in accordance with the National Environmental Policy Act and Section 106 of the National Historic Preservation Act.

#### Alternative 2

Based on the information provided, we believe that Alternative 2 is a location where the facility could be contained within the City of Alexandria's right-of-way on South Royal Street. It is acceptable to park management that the facility exist within the right-of-way, and off NPS lands. The George Washington Memorial Parkway may need to issue Special Use Permits or a Right-Of-Way Permit to provide for construction, and access for regular maintenance. The issuance of a Permit would constitute a Federal action and require a compliance process in accordance with the National Environmental Policy Act and Section 106 of the National Historic Preservation Act.

#### Alternative 3

Based on the general location of this concept, it is possible that this alternative could be constructed off of NPS lands, but a survey and study would be required to confirm that possibility. It is acceptable to park management that the facility be constructed off of NPS lands. The George Washington Memorial Parkway may need to issue a Special Use Permit or a Right-Of-Way Permit to provide for construction, and access for regular maintenance. The issuance of a Permit would constitute a Federal action and require a compliance process in accordance with the National Environmental Policy Act and Section 106 of the National Historic Preservation Act.

#### Alternative 4

According to the map provided to NPS, this alternative is located on NPS lands inside Jones Point Park. As a result, this alternative development would include following all applicable laws and policies which include (but are not limited to) The National Environmental Policy Act and the National Historic Preservation Act. Assuming that when this alternative is fully developed it complies with applicable laws and policy, any facility associated with the project would require an additional Special Use Permit or Right-Of-Way Permits for access and maintenance. The issuance of a Permit would constitute a Federal action and require a compliance process in accordance with the National Environmental Policy Act and Section 106 of the National Historic Preservation Act. As we indicated in the meeting, the park is not supportive of this alternative, because there are viable alternative locations available other than inside Jones Point Park. Generally, right-of-way Permits are issued only if there is no practicable alternative to the use of NPS lands.

I hope that these comments are helpful as you continue to work through your process of determining the best location for your storm water system improvements.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alexcy Romero". The signature is fluid and cursive, with the first name "Alexcy" and last name "Romero" clearly distinguishable.

Alexcy Romero  
Superintendent

bcc:

NCR LPD Land Resources McCabe

GWMP File

GWMP RM Monteleone

GWMP LPD Newman

GWMP LPD McCallum

GWMP LPD Nadas

JNadas:4-4-16:703-419-6424: Jones Point Park Combined Sewer System Letter Final