

June 1, 2025

Mr. James Parajon
City Manager
City of Alexandria
301 King Street
Alexandria, VA 22314

RE: Waterfront Small Area Plan Implementation and Flood Mitigation, "Pump Station"

Dear Mr. Parajon:

I am a Commissioner with the Alexandria Historical Restoration and Preservation Commission (AHRPC), but I am submitting this letter as an individual taxpayer and citizen of Alexandria. The opinions in this letter are mine and mine alone.

I reached these conclusions following my research for the letter from AHRPC dated May 20, 2025 to you and others.

1. The Pump Station/public bathrooms do not belong in Waterfront Park. The placement in the park would damage the Historic District as well as the park. This decision initiates clear and dangerous precedent-setting behavior that changes the boundaries and protection of the Historic District and opens any Alexandria Historic District to development.

An example of this total disregard of the meaning of an historic district is the City Staff's logic to overturn *Design Guidelines* to justify the placement of the Pump Station in Waterfront Park. They, in effect, reclassify the park as outside the boundaries of the Alexandria Historic District. They contend that its "immediate setting is modern in nature with nearby historic buildings located north and west of the project."¹ I disagree with the City's reclassification of the park as no longer part of the Alexandria Historic District. Waterfront Park is not in a "modern" location but within the boundaries of the Alexandria Historic District and under the National Park Service's easements.

The Alexandria Historic District and traditionally all historic districts are more than just buildings. The National Park Service describes the significance of the Alexandria Historic District:

The architecture reflects a wide spectrum of building materials, construction methods, and architectural styles, ranging from vernacular work done by local craftsmen to the finest products of Continental artisans. Construction materials include wood, brick, stone, and log, used in industrial warehouses, shops and commercial establishments, churches, schools, and residences. **The historic district today retains a high level of integrity of location, setting, design, workmanship, materials, feeling, and association.**

The historic buildings along the Strand, some of which are now sympathetically repurposed and the cobbled entrance to Prince St. are visible from the park, and, like the Waterfront Park, part of the Historic District. The park contributes to the locational integrity and feeling of the historic waterfront and association with its long-ago river activity.

The placement of the Pump Station/public bathrooms in Waterfront Park would damage the Historic District as well as the park. The currently-proposed building is a massive (36'-6" X 103'-4" X 28'), stand-alone, windowless, flat-roofed modern building that would negatively impact the streetscape and site lines of the Historic District. It blocks the views of the existing historic buildings as well as the Potomac River from the ground and second story of restaurant terraces. Its placement requires cutting down centennial trees and its 3,770 sq. ft. footprint cements over a substantial current green space.

2.The City's simplistic cost analysis is not an adequate or an appropriate public policy methodology for the decision to put the Pump Station in Waterfront Park. By not using transparent cost/benefit analysis, the City does not quantify stakeholders' concerns and prematurely dismisses options that might be feasible and desirable.

Public projects of this nature and importance have for many years relied on cost/benefit analysis to quantify both costs and benefits over the life of the project. Stakeholders' concerns can be discussed, quantified and included in the decision. This allows for clear tradeoffs using data that capture a wide range of stakeholders' views now and in the future. These go beyond simple engineering estimates. From documents available on the City's website, there has not been a transparent evaluation of all the quantifiable costs and benefits offered by stakeholders to justify design decisions.ⁱⁱ Rather, cost alone trumps all.

The City's Waterfront Flood Mitigation Project Designⁱⁱⁱ section "About the Project" states that its update of the 2014 Schematic Landscape design uses engineering and cost analysis to develop new concept models to address waterfront flooding. Documents listed in the City's Waterfront Flood Mitigation Document Library,^{iv} reflect this engineering, one point in time, cost-only methodology. This method is more appropriate for a sewer project in a suburban industrial park. The City's methodology, in other words, assumes the value of the park is zero.

Good public policy would go beyond construction costs to use data such as the change in the tax base, the drop in property values, the loss of tourism dollars, the deterioration of the reputation of Old Town as a unique historic location, the loss of future investment in the commercial area, the drop in traffic to nearby restaurants and retail, the maintenance and replacement costs of machinery, and the environmental effects of noise, odor, wildlife deterioration. The City should realistically estimate legal fees resulting from efforts to stop the development. Historic preservationists would add the negative impact of the Pump Station on the Alexandria Historic District's street-scape

and site lines plus the difficulty of “selling” AHRPC historic easements as a result of the questionable support for Old Town’s historic fabric.

Another obvious failing of the simple cost analysis methodology is the way in which it prematurely eliminates options. This has been the case of the 1A Prince St location. It is an obvious solution that should be studied using cost/benefit methodology. It is outside the Waterfront Park, does not add to the existing modern buildings along the Strand and would not block views or infringe on the integrity of the park within the Historic District. The massive size of the Pump Station would be absorbed by the existing size of its neighboring buildings along the Strand. However, this may not be the only option available that would preserve the park and the integrity of the Historic District.

3. Health and environmental concerns over time are not quantified and included in any transparent way in the City’s decision-making. Noise, air pollution, vibration levels and the loss of wildlife habitat are some of the environmental costs that are either absent or treated as short term, residual construction concerns.

The Pump Station noise levels exceed the healthy levels for humans and wildlife.^v

Regardless of the current City’s Code of Ordinances, the Pump Station decibel levels are too high for a park. Changing the code levels or granting exemptions to existing code levels does not change the harm being done.^{vi} Noise pollution has been well documented as being harmful to humans and wildlife. In urban parks, acceptable noise levels typically fall within the range of 45 to 60 decibels (dB), and the World Health Organization recommends 55 dB for outdoor playgrounds. Urban noise levels exceeding 55 decibels (dB) can result in poor public health outcomes...”^{vii}

One study estimated that:

104 million individuals had annual LEQ(24) levels > 70 dBA (equivalent to a continuous average exposure level of >70 dBA over 24 hours) in 2013 and were at risk of noise-induced hearing loss. Tens of millions more may be at risk of heart disease, and other noise-related health effects^{viii}

A growing number of studies indicate that animals, like humans, are negatively affected by noisy environments.^{ix} Noise levels as low as 40 dBA can negatively impact birds and wildlife.^x Small increases in noise can cause wildlife disruption and fragmentation, by reducing the area where wildlife can hear and respond to important sounds, impacting their ability to communicate, forage, and avoid predators and affecting local flora and fauna. The City provides a 2016 report which lists endangered species but does not elaborate on the environmental impact of the current Pump Station design.^{xi}

The City provides a 2022 “pre-decisional “noise report by Skanska.^{xii} It states that the Pump Station would house a total of five storm water pumps, HVAC equipment and an emergency generator. There is no estimate offered in the report for how long the pumps

would operate, how many times they would cycle on and off, the number of times they will be operated due to maintenance or the level of sound as they cycle on and off.

According to the Skanska report, even when the pumping chamber is treated to reduce the noise,

During standard daytime pump station operations, the HVAC equipment and the pumps may operate at full capacity. In this condition, the total sound pressure will be 71.5 dB(A). If the generator is added, the total sound pressure is 75.7 dB(A).
(p. 4)

Air and water pollution costs over time are not addressed.

The City does not adequately include the true environmental impact of the Pump Station on Waterfront Park and its location within the broader series of waterfront parks. The City's "environmental" reports feature engineering studies of construction concerns related to soil and water conditions. They also do not include a summation of costs over the life of the project (50 years?) that includes maintenance, odor control (public bathrooms, diesel engines), air pollution, vibration effects on nearby historic buildings during construction and the operation of the pumps,^{xiii} wildlife disruption, loss of green space with mature shade trees, etc.

The City documents do not offer analyses or costs of other standard environmental impacts associated with the Pump Station. EPA regulations for pumping stations primarily focus on ensuring that any discharges from these facilities comply with the Clean Water Act.^{xiv} There are specific limits on pollutants, required monitoring and reporting. Pump stations must also adhere to pretreatment standards, which prevent pollutants from interfering with publicly owned treatment works (POTWs). Odor can also be an issue ranging from expected operational smells to problems caused by leaks or damage.

Air pollution is another obvious part of the operation of Pump Stations. We do not know the exact type of pump being considered by the City or how pollution levels might be mitigated. The Skanska report describes three 750 horsepower pumps, two 100 horsepower pumps, HVAC pumps and an emergency power generator.

In general, each 750- horsepower water pumping engine will contribute to air pollution, primarily through the emission of greenhouse gases and other pollutants during the combustion process. These emissions include particulate matter, carbon monoxide, sulfur dioxide, and nitrogen oxides, all of which can have adverse health impacts. Diesel engines are considered among the worst polluters.

In the case of wastewater pump stations, there is also a risk of accidental spills or leaks, which can lead to water pollution and contamination of nearby water bodies or soil. The cost of proper maintenance and monitoring are crucial to prevent such incidents and should be included in the cost-benefit analysis.

4. Fact-based studies of how the current use of the park will change with the Pump Station in the park are not publicly available. How does the City's design of the Pump Station in the park actually meet preferences by stakeholders concerning the use of the park?

The City's 2024 Satisfaction Survey found that 90 percent of respondents had visited a park in Alexandria. Waterfront Park is considered a treasure because of its current use and its position as integral to the larger waterfront area. It is an urban park where people go to find calm, open green space, clean air, community and a chance to sit under trees and listen to the soothing sound of nature and the river. In the concept design going before the BAR (June 5), where are the data that support the notion that having a picnic beneath the cement floor of a pump station surrounded by reverberating sound and vibrations as well as diesel fumes is comparable or better than the park's current use? What trade-offs are being made without real data from stakeholders?

In conclusion:

- Waterfront Park is within the Alexandria Historic District, and the Pump Station should not be placed in Waterfront Park. It is not only detrimental to the use of the treasured urban park but also to the integrity of the Alexandria Historic District and historic fabric of Old Town. The City's reasoning for changing the boundaries of the Historic District to allow for industrial development of the park should not stand and are a dangerous precedent.
- The City's use of simple cost analysis methodology should be replaced with a comprehensive and transparent cost benefit analysis. The current method of using only engineering and construction costs at one point in time fails to consider and quantify stakeholders' concerns.
- Simple cost analysis artificially limits options and biases outcomes in a search for a better option. Acquiring and redeveloping the private property (1A Prince St.) as the site for the Pumping Station and public bathrooms should be reconsidered using cost benefit analysis. It is a once-in-a-lifetime opportunity to preserve and improve the experience of Waterfront Park and the waterfront area as a whole, for multiple future generations.
- The environmental impacts of water and air pollution, odor and noise have not been evaluated and included in the costs of the project over time. This is crucial to the setting, location and feel of the Alexandria Historic District as well as the health of users of the park and wildlife. The City's preliminary noise report finds that even with mitigating factors, noise levels are in ranges that are unhealthy for humans and wildlife.

Sincerely,

Mary Lou Egan, PhD
319 Prince St.
Alexandria, VA 22314

Cc: Honorable Mayor & Members of the Alexandria City Council
Lebaron K. Reid, Chair, Waterfront Commission
Dana Colarulli, Chair, Alexandria Park and Recreation Commission
Ivy Whitlatch, Chair, Alexandria Archaeological Commission
Ted Alberon, BAR
Waterfront Flood Mitigation Project

ⁱ Memorandum from Historic Preservation Staff to BAR regarding Concept Review of 1A Prince Street – Waterfront Park and Pump Station and Lumley Park, Bar Case #2024-00435. Dec 18, 2024.

ⁱⁱⁱ Waterfront Flood Mitigation Project Design, <https://www.alexandriava.gov/waterfront/program/waterfront-flood-mitigation-project-design> page updated on March 19, 2025

^{iv}Waterfront Flood Mitigation Document Library, <https://www.alexandriava.gov/waterfront/waterfront-flood-mitigation-document-library>

^v According to Alexandria’s Code of Ordinances for noise, the limits are: residential (55 dB); Commercial between 11pm and 7am (60 dB); and Institutional (60 dB). It is compliant with daytime Commercial (65 dB) and Industrial (70 dB). See The decibel level for Alexandria. See Alexandria, VA Code of Ordinances, Table III, Maximum Permissible Sound Levels.

https://library.municode.com/va/alexandria/codes/code_of_ordinances?nodeId=PTIITHC_OGEOR_TIT11HEENSARE_CH5NOCO_S11-5-5NOPRECPR

^{vi} The City updated the noise ordinance level to 75dB(A) in January 2022.

^{vii} <https://research.perkinswill.com/articles/sound-parks-invisible-agents-of-urban-well-being/>

^{viii} Environmental Noise Pollution in the United States: Developing an Effective Public Health Response. Monica S. Hammer,¹ Tracy K. Swinburn,² and Richard L. Neitzel,^{2,3} *The Network for Public Health Law—Mid-States Region*, The University of Michigan School of Public Health, Ann Arbor, Michigan, USA; ² *The Risk Science Center*, The University of Michigan, Ann Arbor, Michigan, USA; ³ *The Department of Environmental Health Sciences*, The University of Michigan, Ann Arbor, Michigan, USA <https://pmc.ncbi.nlm.nih.gov/articles/PMC3915267/pdf/ehp.1307272.pdf>

^{ix} Shannon, G., M. F. McKenna, L. M. Angeloni, K. R. Crooks, K. M. Fristrup, E. Brown, K. A. Warner, M. D. Nelson, C. White, J. Briggs, S. McFarland, and G. Wittemyer. (2015). A synthesis of two decades of research documenting the effects of noise on wildlife. *Biological Reviews* 91(4): 982-1005. <https://doi.org/10.1111/brv.12207>

^x National Park Service, Synthesis of Studies on the Effects of Noise **1978-2024, with 2024 update**, <https://www.nps.gov/articles/effectsofnoise.htm>

^{xi} Dept. of Interior, Fish and Wildlife (2016) <https://media.alexandriava.gov/docs-archives/special/waterfrontplan/info/threatened-and-endangered-species-report.pdf>

^{xii} Skanska, JMTPreliminary Noise Assessment Report Phase 1B (Pre-Design) Feb. 2025 https://www.alexandriava.gov/sites/default/files/2025-03/2025-03-03_WFI_MEMO_Noise%20Analysis_Skanska.pdf

^{xiii} Alexandria does not have a policy on vibration limits. See Arne P. Johnson and W. Robert Hannen, "Vibration Limits for Historic Buildings and Art Collections," APT BULLETIN JOURNAL OF PRESERVATION TECHNOLOGY / 46:2-3 2015 https://www.apti.org/assets/docs/Johnson-HannenHiRes_SampleArt_46.2-3.pdf

^{xiv} US EPA, Clean Water Act [https://www.epa.gov/enforcement/clean-water-act-cwa-and-federal-facilities#:~:text=National%20and%20Local%20Pretreatment%20Standards%20%2D%20Requires,sludge%20generated%20by%20these%20plants%20\(%C2%A7%20307\).](https://www.epa.gov/enforcement/clean-water-act-cwa-and-federal-facilities#:~:text=National%20and%20Local%20Pretreatment%20Standards%20%2D%20Requires,sludge%20generated%20by%20these%20plants%20(%C2%A7%20307).)

May 14, 2025

James Spencer, Chair
City of Alexandria Architectural Review Board
Alexandria City Hall
301 King Street
Alexandria, VA 22314

Re: Proposed Redesign of Point Lumley Park

Dear Mr. Spencer:

We are residents of the Watermark Condominiums located at 225 Strand Street, Alexandria, VA 22314. The Watermark is located directly across the street from Point Lumley Park. We think it is fair to say that no citizens of Alexandria will be more directly impacted by the proposed redesign of Point Lumley Park than the residents of the Watermark. We also note that we and the other Watermark residents pay significant property taxes (as well as other state and local taxes), and have a particular financial interest in the utilization of Point Lumley Park and the manner in which it will affect the use and enjoyment of our properties, as well as the value of those properties, both during and after completion of the Point Lumley project and the proposed pumping station project.

On May 7, 2025, the Architectural Review Board conducted a hearing at which the City of Alexandria and its outside consultants presented a detailed design review of the current plans for Point Lumley Park, which was accompanied by a detailed memorandum. A number of Watermark residents were present for that presentation. While this presentation was very helpful in understanding the city's plans for Point Lumley Park, and while it is evident that considerable time and effort have gone into development of these plans, it is also clear that the city has completely failed to consider the disruption that this project will create for the Watermark's residents, the negative impact it will have on the use and enjoyment of our property, and the reduction of our property values that will result from the current plans. Moreover, it is apparent that the current plans divert money that is earmarked in the waterfront master plan for removal of the unsightly power lines on Strand Street and repurposed it for a lengthy list of "amenities" in the park, including a shade structure with waterfront steps; a floating wetlands and kayak launch; a bioretention area with boardwalk and children's play/learning nodes; and a stage-like structure in front of a "grand event lawn," which the planners stated at the hearing could be used for music and concerts, and which the plans state will "maximize flexibility for programming and events." The net result of all of these "amenities" would be a very significant and completely unacceptable increase in noise, congestion and traffic directly in front of our building that will have a severe negative impact on the use and enjoyment, as well as the property values, of the units in our building.

Although the issue of the pumping station was not on the agenda for the May 7 meeting, we would also note that this is another issue for which the City of Alexandria has failed adequately to consider—or to consider at all—the impact of its plans on the residents of our building. Putting aside the substantial question of whether the current pumping station plans are necessary or appropriate, given the astronomical cost which has been projected, and whether a less intrusive and expensive alternative is available to mitigate flooding, we understand that the current proposal is to use the parking lot that is currently directly across the street from our building as a staging

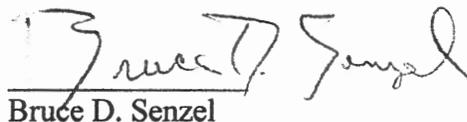
area for the heavy trucks, equipment and machinery that will be employed in digging pipes in our area and constructing the pumping station. We also understand that the current estimate is that this will take *years* to accomplish, and our experience tells us that whatever estimate is provided at the outset of the project is likely to be an *underestimate*. It would be difficult to imagine the city undertaking an activity that would create more noise, disruption and inconvenience for the Watermark's residents, or that would have a more direct and adverse impact on the value and marketability of our units. Furthermore, using this parking lot as a staging area, with access/egress by workmen and heavy vehicular traffic, raises significant safety concerns given the car, foot, and restaurant traffic already existing on Strand Street, which is a narrow thoroughfare. This is all the more disturbing since Waterfront Park could be used for this purpose which, while still inconvenient, would be much less so, and would have less drastic an impact on residents and nearby businesses than using the parking lot across the street from our building. Similarly, we do not understand why the current plan is to locate the pumping station on the northeast corner of Prince and Strand Street, when One Prince Street presents a less unsightly, less disruptive and less noisy alternative.

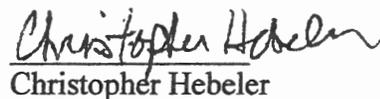
We urgently request that the Architectural Review Board and the City of Alexandria and its consultants address our concerns and revise the current plans in order to come up with better options. We look forward to hearing from you and from the city.

Yours truly,


N. Richard Janis


Janet L. Hirshberg


Bruce D. Senzel


Christopher Hebel


Hillary Zimmerman

Alaine Blair/mo/
Alaine Blair

Rainer Blair/mo/
Rainer Blair

cc: Robert Adams, ARB
Theresa Del Ninno, ARB
Margaret Miller, ARB
Andrew Scott, ARB
Michael Lyons, ARB
Nastaran Zandran, ARB
Mayor Alyia Gaskins
Vice Mayor Sarah Bagley
Councilman Canek Aguirre
Councilman John Chapman
Councilman Abdel-Rahman Elnoubi
Councilwoman Jacinta E. Greene

From: [REDACTED]
To: [REDACTED]
Subject: [EXTERNAL]BAR CONCEPT REVIEW#2025-00172 PUMP STATION
Date: Tuesday, June 3, 2025 7:41:47 AM

You don't often get email from [REDACTED]@ [REDACTED] [REDACTED] [Learn why this is important](#)

Sir

I would like to suggest that the City consider placing the Pump Station building parallel to Strand Street, not perpendicular. I understand that the City is trying to have a continuous green space along Alexandria City's river front from Jones Point Park (South) to The Washington Sailing Marina (North).

The current planned positioning of the Pump House, parallel to Prince Street would be a major wall to this concept.

Thank you for your consideration.

Douglas Wood

[REDACTED]

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June 4, 2025

Andrew Scott (Chair)
Robert Bentley. (Bud) Adams
Michael Lyons
Margaret Miller
Theresa del Ninno
James Spencer
Nastaran Zandian
Alexandria Board of Architectural Review
Alexandria City Hall
301 King Street
Alexandria, Virginia 22314

By email:

Re: BAR # 2025-00172 - OHAD, Concept Review of 2 King Street- Waterfront Park and Pump Station, June 5, 2025

Dear Chairman Scott and BAR members:

The Alexandria Waterfront Alliance is a group of individuals, businesses, and civic organizations whose constituents are by far the most impacted by the flood events that the Pump Station project is designed to mitigate, and stand to benefit the most from the promised improvements of this project.¹ And yet because the current Pump Station design is so ill-suited for the proposed location in Waterfront Park, we stand united in expressing our adamant opposition to both the design and location of this structure. Any proposed benefits of this project are far outweighed by the negative aspects, particularly in light of the fact that there are superior alternatives that could be constructed at lower cost, and with less disruption to waterfront businesses and residents, that have not been adequately considered.

I. Siting and Design Does Not Meet The Specific Criteria For A Certificate of Appropriateness

The BAR's authority includes the right to oppose building anything at all in an inappropriate location, like a public park. The purpose of Article X of the Alexandria zoning ordinance for the Old and Historic Alexandria District ("District") that the BAR was constituted to defend and protect includes the preservation of open space settings

¹ The Alexandria Waterfront Alliance includes the Historic Alexandria Foundation, Old Town Civic Association, Old Dominion Boat Club, Alexandria Restaurants, and over 100 near-by residents and business owners who have united in opposition to the proposed Pump Station location on Prince Street.

like Waterfront Park and others, including specifically, “**preservation of . . . landscapes, settings, neighborhoods, places and features with special historical significance.**”²

To support that core purpose, the code prohibits the construction of structures in the District unless the BAR has determined that the structure is appropriate and consistent with specified design criteria. The location and design presented by the City Staff for the Pump Station does not meet the following specified criteria for approval set for in section 10-105(A)(2):

a) Overall Architectural Design Including Height, Mass and Scale is Inappropriate - 300% Larger Total Volume than the Previous Design

The previously proposed structure was 103 feet long, 36 feet wide, and 24 feet high. While the City claims the new structure is smaller, it is actually larger and occupies significantly more visual space than the prior design. The full footprint, including the new “covered canopy” and overhangs is 116 feet long by 66 feet wide. The building has now grown to 33 feet high (“top of scrim”), with more mass on a second story than the first.

Since a key concern here is the blockage of a critically important viewshed of the Potomac River, it is these overall dimensions that matter for the BAR’s review. For comparison, the overall cubic volume and mass of the currently proposed structure (using the above overall dimensions for comparison) is about 3 times, or 300% larger than the prior proposal, which the BAR members told the City was already too large.³ This contradicts both the BAR’s prior feedback, when the City was told the mass to too large, and Alexandria Zoning Ordinance § 10-105(A)(2)(a). Last but not least, the proposed height is more than double the height allowed under the City’s deed restriction for this property, as discussed in more detail below.

b) Architectural Details Including Rusted Steel Scrim Cladding Materials are Inappropriate

The current proposal is a Brutalist concrete block structure partially clad in a rust-colored steel “scrim material.” This design choice blocks what is currently a view of the tall ship Providence and the Potomac River with what could be described as a rusty

² Alex. Zon. Ord. § 10-101.

³ Prior proposal: 103 x 36 x 24 = 88,992 sq. feet. Current proposal with overhangs: 116 x 66 x 33 = 252,648 sq. feet.

metal wall which relates to nothing architecturally currently or previously built in the area, unless the intention is to evoke the metal Robinson Terminal warehouses, from the era in which they were abandoned and left to rust on the waterfront. These buildings were demolished for good reason. This is in contravention of Alexandria Zoning Ordinance § 10-105(A)(2)(b) and related Design Guidelines.

c) Impact On Historic Setting, Streetscape and Environs is Inappropriate

Unlike most proposed structures that the BAR reviews, the current proposal relates to the construction of a massive industrial/utility building in what is arguably Alexandria's most important waterfront park. Waterfront Park is the park area connecting King Street to Prince Street at the heart of Old Town's historic axis focused on the Potomac River and is in the heart of Alexandria's most important center for tourism related to Alexandria's maritime history. This park is a unique catalyst for history, business, tourism and recreation that is unequalled by any other park in the City. The park also now features the Tall Ship Providence which celebrates both the City's and the Nation's maritime history.

The core problem with the current proposal, is that it is too big, and its location blocks views of the river. By placing the Pump Station along Prince Street, and close the river, it maximizes the building's negative impact on this critical scenic viewshed. The view of the Potomac should be made as wide and expansive as possible, to celebrate its beauty, and to draw citizens and tourists from the west towards the water, and to all of the business and historic attractions that await citizens and tourists alike along the water. The waterfront promenade offers extraordinary 270-degree views of the Potomac, the relatively undisturbed Oxon Hill Maryland shore to the East, and an extraordinarily clear view of Washington, DC. from 8 miles away that includes the Capitol of the United States, the National Cathedral, and the Washington Monument to the North. The City's current proposal simply creates a wall that blocks much of that view from Prince and Union streets, when we should be making every effort to open or simply maintain that existing viewshed. The closer this structure is to the water, the more the view is blocked, and what is now a panoramic view, will become a small aperture. This is in contravention of Alexandria Zoning Ordinance § 10-105(A)(2)(c) and related Design Guidelines.

For this reason, as discussed below, if any structure is going to be built around Waterfront Park, it should in the existing parking spaces on the South Strand, on the far western side of the park, or outside of any current public park.

d) Preservation and Protection of Historic Places and Areas of Interest

City parkland, and open space in general, is a precious commodity in an urban environment. City Planners, City Councilors, local environmental conservationists, and historic preservationists have been working for over three-quarters of a century to expand the amount of public open space and parkland in the City of Alexandria available for public use and recreation. In no place has this effort been more important and impactful than on the City's waterfront. Placing this now-giant rusty metal box in this precious open space (or any other public open space) destroys a place of both historic and public interest and utility that has taken over 75 years to create and is in violation of Alexandria Zoning Ordinance § 10-105(A)(2)(g) and related Design Guidelines.

e) Promotion of General Welfare

As discussed below, the current plan takes what was planned and approved under the Waterfront Small Area Plan in 2012 as two small pump stations and converts the design to a single gigantic Pump Station.

There are many problems with this design change. One of them is that it requires the creation of a "lateral" stormwater drainpipe along Union Street from Founder's Park to Prince Street to transport water from the entire historic Old Town watershed to the foot of Prince street. This unitary pipeline is bigger than any current stormwater pipe, and it must be buried deep (up to 17 feet below grade) to maintain a gravity drop all the way to Prince Street. This means that all businesses and residents along the Alexandria waterfront will be severely impacted by what is projected by the City to be over three years of construction disturbances. The failure to pursue a design that minimizes these disturbances is an unnecessary negative impact on the general welfare of residents and the business community of Alexandria and is a contravention of Alexandria Zoning Ordinance § 10-105(A)(2)(j) and related Design Guidelines.

II. New Proposal Ignores BAR's Comments on Original Proposal

The staggering number of "negatives" about this design are quite obvious as set forth above. Significantly, every member of the BAR told the City last December that if anything had to be constructed in or near the park, it should be much smaller, and should be located on the Strand side of the park and as far west as possible. Specifically, the minutes of the December 18, 2024 meeting state that Ms. del Ninno,

Mr. Lyons, Ms. Miller, Ms. Zandian, Mr. Scott and Mr. Spencer all expressed support for locating the Pump Station on the Strand location, as close to the Stand as possible.

III. New Proposal is Inconsistent with the Waterfront Small Area Plan/Olin Plan

The design and location of stormwater pump stations were specifically addressed in the Waterfront Small Area Plan (more commonly known as the “Olin Plan”).⁴ The Olin Plan is currently the law of Alexandria with respect to construction along the waterfront. It was based on many years of professional design and analysis, extensive public review and comment, as well as complicated and hard-won compromises between myriad important stakeholders. It was ultimately voted on and approved by City Council. The 2012 Waterfront Plan, more commonly known as the Olin Plan, included not one but two pump stations. This decision was recommended because it was determined critical for reliability, and because it enabled the construction of two small pump stations, about a half-mile apart, which would each have less visual impact on the locations where they were built. The size of the current proposal represents an abandonment of that key design element that has not been sufficiently explained to the public.

The location of the pump station near Waterfront Park was also specifically addressed in the Olin Plan, and it was placed in the parking spaces along South Strand Street, on the far West side of Waterfront Park. If anything must be built, this is where it should go, if appropriately sized and designed.

IV. New Proposal Violates City’s Deed Restrictions on the Property

The BAR should not approve a construction project that is illegal. Waterfront Park was deeded to the City from the Federal Government in 1981 after decades of litigation about the ownership of land along the Alexandria waterfront. This litigation culminated in a federal consent order entered by a federal judge in the District of Columbia to resolve the litigation between the U.S. Department of Justice and the City. The deed, the related Stipulation of Settlement, and Consent Judgement Order of the Court put specific restrictions on both what Waterfront Park can be used for, and exactly what can be built in it. Specifically, these legal documents, specify that the property must be used as a public park only. There is no reference to using the park for any industrial or municipal utility purpose, including for pump stations. Similarly, these legal documents

⁴ See Alexandria Waterfront: Small Area Plan, City of Alexandria (Feb. 25, 2012).

specify that no structure can be built in Waterfront Park that is above 15 feet high. The City's proposal is more than double what that deed restriction allows.

V. Proposal Ignores Less Costly Alternatives That *Would* Meet BAR Criteria

A review of past City evaluations of solutions to waterfront storm flooding reveals a simpler, and more cost effective solution to the issues the City is trying to address that would be: less costly, less disruptive to residents and local businesses, and legally consistent with both the Olin Plan, and the 1981 Deed Restrictions on the park.

This alternative has two major components, which work together to either reduce the required size of a pump station, or could eliminate it altogether. These components are: 1) reducing the amount of stormwater that collects at the foot of King and Prince Streets; and 2) tempering the City's design goals for achieving an arbitrary number of "water free" days and completely dry feet in Old Town.

I. Reducing the Volume of Water that Ever Needs to be Pumped

A review the City's own website reveals a number of incremental steps that were once viewed by the City as both practical and effective at reducing the amount of water that needs to be pumped out of the low areas along Union Street. Employing these measures as a package will dramatically decrease the amount of water in the Union Street basin without pumping or moving water laterally along Union. These steps alone could either radically reduce the costs and scope pumping infrastructure, and critically reduce the size of the Pump Station, enabling it to be relocated to a smaller space, or simply eliminate it altogether for even greater savings.

These features are as follows:

1. Complete the Olin Plan's Sea Wall, Promenade and Park Improvements

The Olin Plan included a number of significant improvements to Waterfront Park, the Park at the foot of King Street, and Point Lumley between Prince and Duke, that have not yet been implemented. These improvements include the completion of a new sea wall/bulkhead and a waterfront promenade that will keep river flooding out of the Union Street "basin." These improvements also include raising the grades of the street at the foot of King and Prince 6-12 inches, so that they would simply hold less water, and reduce the size of the Union Street "basin" that currently collects excess rainwater. If

the bottom of the basin is raised to the maximum extent, as proposed in the Olin Plan, it will hold less water and can facilitate the running stormwater drains by gravity out through the new sea wall at slightly higher elevations than the current system as discussed below.

2. Run Storm Water From Fairfax Straight East to the Potomac River

The proposed pump station is designed to pump rainwater that runs down steeply sloped blocks like the 100 and 200 blocks of Duke, Prince, King and Cameron streets and collects in low spots at the foots (street-ends) of Prince and King Streets (for example). The City currently has a separate capital improvement project to rebuild the aging stormwater pipes in these East-West blocks. The project is already planned.

Instead of just replacing these pipes and continuing to allow the new ones to empty out into the low-spots along Union Street, these new East-West pipes should be routed to drain straight out into the Potomac River, and by-pass gutter drains below Union Street where they currently over-flow and back-flow. Running these pipes straight down these steeply sloped streets into the river would eliminate the need for backflow preventers, which have proven unreliable in keeping high river levels from flooding the Union Street basin. The new seawall with stormwater pipes that by-pass Union Street gutter drains, would eliminate flooding from the river below the six foot elevation proposed for the new sea wall/promenade.

The most disruptive aspect of the current plan for local businesses and residents is a new giant (5-foot diameter) stormwater pipe designed to move water from Founder's Park (where a North Pump Station was planned) down to Prince Street. By diverting water straight into the Potomac, this new giant lateral Union Street pipe can be eliminated, which would significantly reduce the amount of disruption to local residents and businesses.

3. Movable Barrier

If the City is not willing to pursue the second Northern Pump Station that was previously planned for the Founders' Park area, it can keep the water from the Founder's Park basin from flowing to the foots of King and Prince with the use of a

moveable flood barrier. Such a barrier was discussed favorably in at the Alexandria Waterfront Commission on February 15, 2022.⁵

II. Modify the Design Goal For Mitigation As Needed To Address other Interests

The City's goal for the current project has never been to prevent all flooding in the affected Union Street basin. For example, under the City's current plan during a hurricane or major rain event, when the river over-tops the proposed six-foot seawall, the entire waterfront will continue to flood as it does today, and as it has done for more than two centuries, and the pump station would not even be activated at all to fight mother nature.

Instead, the intent of the pump station is to simply marginally reduce the number of days or even hours, that the lowest-lying areas are flooded and un-passable during more typical heavy-rain events. By implementing the sustainable gravity-based steps listed above, the City could reduce the critical drainage area served by this project by 50%, from approximately 10 city blocks, to less than 5 city blocks. Similarly, by increasing grade levels at the foot of Prince and King by 6-12 inches (even with the existing sidewalks +/-), approximately 66,000 square feet of what is currently the lowest flooding areas by the Union Street Starbucks, and Misha's Coffee House would be lifted up and even with areas that rarely flood. By implementing these steps, most residents and businesses would no longer feel any need to invest in a Pump Station to marginally increase the number of hours per-year without any pooling water. But if the City insists on spending over \$100 million dollars on a Pump Station project that we the affected businesses and residents do not want, then the size and expense of that Pump could be reduced by over 50% compared to the City's current plan, by implementing the alternative measures listed above.

⁵(see, p.42 <https://www.alexandriava.gov/sites/default/files/202205/WaterfrontComissionFloodMitigation15feb2022updated.pdf>)

Respectfully submitted,



R. Latane Montague
Historic Alexandria Foundation Board Member
Alexandria Waterfront Commission Member

/S/ Robert Weinhagen,
President
Historic Alexandria Foundation

/S/ Stephen Wintermeyer
President
Watermark Condominium HOA

/S/ Murray Bonitt,
President
Bonitt Builders

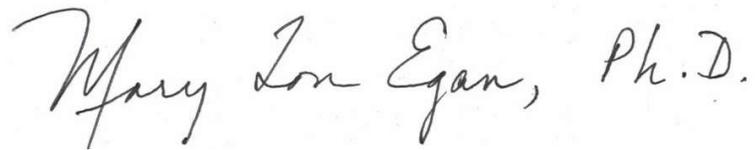


Paul Beckmann, AIA NCARB
Principal, Beckmann Architects



Marc Bendick, Jr.
Resident, 319 Prince Street
Vice Chair, Alexandria Human Rights Commission

Board of Architectural Review
City of Alexandria
June 4, 2025
Page 10



Mary Lou Egan, PhD
Resident, 319 Prince Street
Commissioner, Alexandria Historical Restoration and
Preservation Commission

/S/ Yvonne Weight Callahan,
President
Old Town Civic Association



Stephen Forehand, President
Old Dominion Boat Club

Cc:

William Conkey
william.conkey@alexandriava.gov

Kendra Jacobs
kendra.jacobs@alexandriava.gov

From: [REDACTED]
To: [REDACTED]
Subject: [EXTERNAL]Public Comments on Waterfront Flood Mitigation Project
Date: Thursday, June 5, 2025 9:33:18 AM
Attachments: [image001.png](#)

You don't often get email from [REDACTED]. [Learn why this is important](#)

Ted,

Please distribute to the BAR for the hearing:

Re: Docket Item #18, BAR2025-00172

Chair Scott and members of the BAR:

My name is Stuart Fox and I operate the real estate portfolio of Route 66, we own many of the properties on Strand St. between Cameron and Prince streets. I write to you today to ask you to do two things:

1. Endorse the Waterfront Park and King Street portions of the plan, including the bulkhead/promenade, street-end parks, and pedestrian improvements using the Waterfront Common Elements guidelines previously approved by the BAR in 2016.
2. Encourage the City to elevate the streetscape and parks to the maximum extent feasible in order to passively reduce the bathtub area now subject to nuisance flooding and thereby reduce (but not eliminate) the size and scale of the pump station and the underground stormwater infrastructure necessary.

Thank you,



Stuart A. Fox, CFA, CPA

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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From: [REDACTED]
To: [REDACTED]
Subject: FW: [EXTERNAL]Public Comments: Waterfront Park, Docket Item #18, BAR2025-00172
Date: Thursday, June 5, 2025 8:55:08 AM

Please send the attached letter to the Board and attach it to the docket, regarding the Pump Station concept review tonight.

Bill Conkey, AIA
Historic Preservation Architect
City of Alexandria, Virginia
Dept of Planning & Zoning
703.746.3854
alexandriava.gov



The City of Alexandria's 275th Anniversary

From: [REDACTED]
Sent: Wednesday, June 4, 2025 8:29 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL]Public Comments: Waterfront Park, Docket Item #18, BAR2025-00172

Bill: Please distribute this email to the BAR members prior to the hearing. I am out of town and unable to testify in person.

Re: Docket Item #18, BAR2025-00172

Chair Scott and members of the BAR:

Last month, I spoke to you praising the remarkable revisions made by the City to execute a Point Lumley Park plan that now closely reflects the 2014 Waterfront Core Area Master Plan endorsed by the BAR and approved by City Council at that time. I noted only that street and park grades should be elevated to the maximum extent possible to reduce the amount of water in the “bathtub” along the Strand that must be pumped mechanically into the Potomac River. Thank you for endorsing the revised Point Lumley concept plan.

I write now to strongly encourage you to endorse, as submitted, all aspects of the Waterfront Park and King Street portions of the plan, including the bulkhead/promenade, street-end parks and pedestrian improvements using the Waterfront Common Elements guidelines previously approved by the BAR in 2016. Once again, I encourage the City to elevate the streetscape and parks to the maximum extent feasible in order to passively reduce the bathtub area now subject to nuisance flooding.

However, I join with the surrounding residents and business owners who find the scale, mass, height and architectural character of the pump station completely incongruous with its context. While acknowledging that the architectural design of the proposed station has significantly improved since the previous BAR hearing, and that some might find it attractive adjacent to the Virginia Tech campus in Potomac Yard, we unanimously find it to be grossly inappropriate in Waterfront Park within the historic district. We understand that a pump station with a more historically compatible design and a significantly reduced size in a functionally and aesthetically appropriate location is necessary to mitigate nuisance flooding -- but this simply isn't it.

Please **endorse** the design of the proposed park and streetscape improvements and **defer** the pump station for restudy of a smaller, more appropriate pump station.

Thank you.

Sincerely,

Al Cox, FAIA emeritus

[REDACTED]
[REDACTED]
[REDACTED]

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From: [REDACTED]
To: [REDACTED]
Subject: FW: BAR Meeting on June 5, 2025 - Docket Item #18, BAR2025-00172
Date: Thursday, June 5, 2025 11:25:32 AM

Here is one more letter about the Pump Station.

Bill Conkey, AIA
Historic Preservation Architect
City of Alexandria, Virginia
Dept of Planning & Zoning
703.746.3854
alexandriava.gov



The City of Alexandria's 275th Anniversary

From: Charlotte Hall [REDACTED]
Sent: Thursday, June 5, 2025 11:14 AM
To: William Conkey [REDACTED]
Subject: Re: BAR Meeting on June 5, 2025 - Docket Item #18, BAR2025-00172

You don't often get email from [REDACTED]

Re: Docket Item #18, BAR2025-00172

Dear Members of the BAR,

My name is Charlotte Hall, former executive director of the Old Town Business Association. I am writing on behalf of restaurants and retail shops in the 100 block of King Street, and along the Waterfront Corridor which includes Union Street, the unit blocks of Duke and Prince Streets, and the 200 block of Strand Street.

We strongly encourage you to endorse, as submitted, all aspects of the Waterfront Park and King Street portions of the plan, including the bulkhead/promenade, street-end parks, and pedestrian improvements using the Waterfront Common Elements guidelines previously approved by the BAR in 2016. Once again, we encourage the City to elevate the streetscape and parks to the maximum extent feasible in order to passively reduce the bathtub area now subject to nuisance flooding.

We join with the surrounding residents and business owners who find the scale, mass, height and architectural character of the pump station completely incongruous with its context. While acknowledging that the design of the proposed station has significantly improved since the previous BAR hearing, we unanimously find it to be grossly inappropriate in Waterfront Park within the historic district. We understand that a pump station with a more historically compatible design and a significantly reduced size in a functionally and aesthetically appropriate location is necessary to mitigate nuisance flooding -- but this simply isn't it.

Please **endorse** the design of the proposed park and streetscape improvements and **defer** the pump station for restudy of a smaller, more appropriate pump station.

Thank you.

Sincerely,
Charlotte Hall

--

Charlotte A. Hall

