

Dear Sirs,

Thank you for the opportunity to comment on the Draft Integrated Feasibility Report & Environmental Assessment of May 2022.

The report is informative and technically comprehensive, but it does not adequately address how the significance of the George Washington Memorial Parkway (GWMP), or how it is negatively affected by the National Airport and Belle Haven flood walls (5c/alternative 8) and levies and the GWMP floodwalls (4a).

The GWMP is a Federal Park that is on the Virginia Landmarks Register and National Register of Historic Places because of its history, intent and purpose as can be seen in the two links bellow. It is no accident that the segment, which was completed in 1932 to commemorate the bicentennial of George Washington's birth, was credited with following the shore of the Potomac without consuming it, and it is considered one of the East's most attractively sited roadways and integral part of American heritage tying the past to future generations.

Historic Registration Designation

<https://www.dhr.virginia.gov/historic-registers/029-0228/>

Nomination for Registration

https://www.dhr.virginia.gov/wp-content/uploads/2018/04/029-0228_George_Washington_Memorial_Parkway_1990_Final_Nomination.pdf

The National Historic Preservation Act of 1966 (NHPA) requires that the proposals undergo a Section 106 review because of the historic designation of the GWMP, especially as to how the vistas and view sheds are affected from the GWMP. This road is integral part of the American heritage, and future generations should have the opportunity to experience that same perspective.

Historic preservation considerations for the GWMP are as follows: (a) walls and levies affecting the viewshed of the GWMP should be built with compatible materials within the GWMP, which is stone; and (b) construction traffic on the GWMP is not permitted if an alternative exists, and should not be allowed because they do.

Most infringing and egregiously, some have proposed that the Belle Haven Floodwall/levee should be placed either on the GWMP itself or east of it. However, this violates the intent, purpose, and historical heritage of the park by causing irrevocable damage to the intended memorial character of the GWMP. These alternate Belle Haven proposals are therefore unacceptable, especially since a reasonable alternative exists as seen in proposal 5c/ alternative 8.

(See below and in the attachment for a more comprehensive description of the History of the GWMP)

The George Washington Memorial Parkway

(See also attachment)

The intent and purpose of the George Washington Memorial Parkway (GWMP) was made clear in 1887 by Edward Fox, who, building on the idea that *“every patriotic American who visits Washington makes a pious pilgrimage to the home and tomb of the Father of his Country”*, suggested that *“immediate steps should be taken to make a splendid drive from the Virginia terminus of the Aqueduct Bridge to Mount Vernon”*.

These ideals were further refined by the Macmillan Commission, which envisioned that: *“these drives had certain definitions: Parkways or ways through or between parks; distinguished from highways or ordinary streets by the dominant purpose of recreation rather than movement; restricted to pleasure vehicles, and arranged with regard for scenery, topography and similar features rather than for directness”*.

The George Washington Memorial Parkway and its scenic vistas provide a contemplative and memorial sense for the Father of the United States as you drive to Mount Vernon, and, in the words of the enabling legislation *“a striking and suitable tribute to the Father of our Nation, and one in which the people of America will take just pride and enjoyment”*.

The importance of the George Washington Memorial Parkway (GWMP) can only be properly understood in the context of its history and purpose, to which a lengthier paper can be found in the attachment. The GWMP was envisioned as drive with certain definitions: Parkways or ways through or between parks; distinguished from highways or ordinary streets by the dominant purpose of recreation rather than movement; restricted to pleasure vehicles, and arranged with regard for scenery, topography and similar features rather than for directness.

No words can adequately express just how important the first president was in uniting a young nation. George Washington’s residence at Mount Vernon and the city that bore his name could be dismissed as cultural icons, if it were not for his importance to the American heritage. The two became intertwined through not only George Washington, but also by the road connecting the two. This connection was so great, that in *“Historic Buildings of America as Seen and Described by Famous Writers”*, Arthur Shadwell Martin relates how *“every patriotic American who visits Washington makes a pious pilgrimage to the home and tomb of the Father of his Country. “ But, haste was out of the question,”* the Family Magazine related in 1837, *“for never was worse road extant than that to Mount Vernon.”* Departing from Alexandria, the road to Mount Vernon went inland, rather than along the river as it does today. There was scarcely a glimpse of the scenic

Potomac. Instead, one was required to traverse two large hills on an inland road in various state of disrepair that sometimes was more like a wooded trail.

Caroline Gilman described it in her book, "the Poetry of Travelling" as being "intolerably bad," and that "no one probably passes it without thinking before he arrives at Mount Vernon, that he has paid too dear for his whistle." The City of Alexandria fared no better than the road, having also fallen on hard times. Many authors described it as a dilapidated little town where "no one wishes to linger." Nevertheless, the importance of Mount Vernon was growing in the national conscience, even bringing forth calls for the government to take it over. While the family of George Washington had graciously accepted visitors for many years, they eventually could not manage the upkeep of the Mansion.

To save this landmark, the Mount Vernon Ladies Association was created in 1856 as the first historic preservation effort in America. It raised enough money to purchase the property two years later. Although, roads existed to Mount Vernon, they were neither the original one, nor ones that lent themselves to contemplative or pleasurable drives. Consequently, in 1887, in an article he wrote for the National Republican (a DC paper), Edward Fox came up with the idea to create a National Highway from Washington DC to Mount Vernon. Fox called for the "making of a splendid drive, a grand avenue and 100 feet wide that was properly graded and shaded between the capital city of the nation and the tomb of its great founder."

Building on the enthusiasm of the Fox article, in 1888, Mayor John B. Smoot of Alexandria founded the Mount Vernon Avenue Association in Alexandria to promulgate the creation of a national road to George Washington's home. The road would travel through Alexandria on the basis that many existing establishments were there when George Washington walked these streets. Since fortune had bypassed Alexandria, the buildings were still there. The Mount Vernon Avenue Association appealed to Congress the following year, which then really got started with trying to design this. They appropriated money for a Colonel Haines to come up with three routes (one of which came through Alexandria). No matter which route was selected along the Potomac, Haines intended it always to be in the process of development and embellishment. Envisioned as having a monumental character, the proposed "National Road", was a symbolic link between Mount Vernon Estate, the site so closely associated with George Washington, and the city that bore his name. Congress, unfortunately allocated no further money.

By 1898, the Centennial of the Nation's Capital was impending, so a group of citizens approached President McKinley about a plan for celebrating the event. This eventually resulted in the creation of the McMillan Senate Park Committee in 1901-1902, which was one of the most important committees in the nation's history, and which was named for Senator James McMillan of Michigan, Chairman of the Senate Committee on the District of Columbia. Park enthusiasts, historians, and planners in Washington, DC, often invoke the great and expansive vision of the McMillan Plan as the conceptual underpinnings of today's National Mall and Washington, D.C.'s Park System.

Although the McMillan Commission did not directly deal with it, they very specifically addressed the need for and importance of having a road leading to the home of the father of our nation. The McMillan Senate Park Committee had clearly been influenced by landscape architect pioneers Olmstead, Vaux, Cleveland, and Eliot, who are credited with creating the term "Parkway." The McMillan Committee envisioned that "these drives had certain definitions: Parkways or ways through or between parks; distinguished from highways or ordinary streets by the dominant purpose of recreation rather than movement; restricted to pleasure vehicles, and arranged with regard for scenery, topography and similar features rather than for directness".

Although WWI had taken its toll, interest in history (particularly Colonial and early American history) remained strong. The Bicentennial of George Washington's birth was the impetus for a 1924 committee formed by Congress, and in 1932, the road was constructed. The road did travel through Alexandria on what is now known as "Washington Street." In doing so, the City of Alexandria entered into a 1929 agreement with the Federal Government promising to keep the memorial character of the Parkway. However, by 1946, Alexandria had fallen off the memorial wagon (so to speak), so the Federal Government indicated that the Parkway was to be moved away from Alexandria. At this point, the City of Alexandria offered to create a historic district to protect the Parkway, which would then remain in Alexandria. That is the genesis of Alexandria's historic district.

The George Washington Memorial Parkway thus shares this heritage with the world, as people from all nations and walks of life make a pilgrimage to Mount Vernon to pay their respects to the "Father of Our Country." The George Washington Memorial Parkway also represents a trust placed on the localities by the Federal Government to maintain the highway for the purpose and dignity it that was envisioned to convey, and that the Historic Designation created as a quid pro quo would continue to protect this singular heritage.

To conclude, the George Washington Memorial Parkway inculcates a heritage that warrants sharing with the world, as people from all over the globe make a pilgrimage from Washington D.C. to Mount Vernon to pay their respects to the Father of this Country. The Parkway also represents a trust placed on the Federal Government and localities that they would maintain the highway for the purpose and dignity it that was envisioned to convey. No person states this as well as did Caroline Oilman in 1838: "indeed, it is a curious step from Alexandria to Mount Vernon; the one teeming with the most worldly associations, and the other sacred to the highest feelings of our nature".

Historic Registers

DHR administers two programs designed to recognize Virginia's historic resources and to encourage their continued preservation: the Virginia Landmarks Register and the National Register of Historic Places.

The Virginia Landmarks Register (VLR):

- Was created in 1965 by the General Assembly in the Code of Virginia;
- Is the Commonwealth's official list of places of historic, architectural, archaeological and/or cultural significance;
- Is managed by staff of the Department of Historic Resources on behalf of the Virginia Board of Historic Resources;

The National Register of Historic Places

- Was established in 1966 by the National Historic Preservation Act;
- Is the official list of structures, sites, objects, and districts that embody the historical and cultural foundations of the United States;
- Includes places of local, state, and national significance;