



**US Army Corps
of Engineers®**

Charleston District

**CHARLESTON PENINSULA, SOUTH CAROLINA,
A COASTAL FLOOD RISK MANAGEMENT STUDY**

Charleston, South Carolina

**VIEWS OF THE NON-FEDERAL SPONSOR(S) AND ANY OTHER
AGENCIES HAVING IMPLEMENTATION RESPONSIBILITIES**

APPENDIX - H

SEPTEMBER 2021

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THE CITY OF CHARLESTON

The City of Charleston, as an active partner in the Charleston Peninsula Study and through numerous studies and efforts, agrees that a Perimeter Protection System, including the proposed wall, is needed to protect the Charleston Peninsula from storm surge flooding, and we support the Tentatively Selective Plan (TSP) put forth in the draft feasibility report and environmental impact statement. The Dutch Dialogues sponsored by the city and adopted by City Council, recommended a system for storm surge and this plan follows that advice. We view the storm surge wall as one component of a larger integrated and comprehensive strategy for the City to manage all types of flooding risks, including surge, rainfall, and tidal flooding.

As currently described in the feasibility report, the alignment of the wall has been optimized to minimize costs and environmental impacts to the study area. We look forward to working with USACE on reasonable alignment changes that may occur in the Pre-Construction Engineering and Design (PED) phase due to potential changes that may include, but are not limited to, new developments in technology or construction methodologies, results of additional engineering analyses, unforeseen cultural and historic resources, the presence of buried utilities not discovered during feasibility, and real estate acquisition challenges. Also, during the PED phase, changes will occur for the purpose of aesthetic and cultural mitigation that could not be identified during the feasibility study because they inherently relate to detailed designs.

The city is fully committed to continuing our partnership throughout the PED phase. The detailed engineering work done during PED will lead to the final design. Through our design partnership, the storm surge wall, to the maximum extent practicable, will be integrated as a community amenity, and shall through thoughtful design and engineering, maintain the historic and cultural fabric and natural environment that is and has been Charleston's hallmark for more than 350 years. In order for this to happen, the design will likely include elements that are considered "betterments" to the federal project. Those betterments will be funded locally without cost share from USACE. Additionally, the city is committed to ensuring that future tidal and storm water flood mitigation plans to improve drainage on the peninsula will work seamlessly with the final storm surge wall design.

We support the TSP as a solution for storm surge protection of our most critical community assets on the peninsula. A storm surge wall is vital to protect a wide range of city, regional, state, and federal assets including: vulnerable and historic neighborhoods; regional and state-wide economic drivers, like the Charleston Medical District and the South Carolina Ports Authority; major state highways; institutions of higher learning; and rich national historic and cultural landmarks. Further, the TSP allows the city to continue to adapt and plan into the next 50 years and beyond. We view the TSP as a key foundational element for the city's overall plan to address flooding.

The following comments outline the City of Charleston's desired path forward for our partnership with the USACE over the next 50 years. These comments are based on innumerable hours of work with USACE personnel, private consultants, other cities going through the feasibility study process, and robust community engagement. We understand that the alignment in the TSP is meant to show an approximation of placement to illustrate the highest net benefit for the National Economic Development Plan. We understand further that the storm surge wall alignment will be optimized further

based on additional engineering study, geotechnical analysis, unforeseen issues around cultural and historical finds, utility disputes, real estate acquisitions and challenges and for aesthetic and cultural mitigation.

We will continue to work together to ensure guidelines developed by the City and in conjunction with the approach outlined in the city sponsored and funded [Perimeter Protection Analysis Report](#) are used to help shape the storm surge wall in a way that is embraced by the city, meets USACE regulations, maintains the federal interest and builds a project to protect our critical interests. During PED, we will continue to explore opportunities to optimize the alignment and construction, given then current conditions, evolving technology and current USACE regulations.

- **Natural and Nature-Based Solutions** – There is strong support from our community, including the residents who live near the TSP, that they want natural and nature-based solutions utilized wherever possible providing they offer similar levels of protection from storm surge. We commend the inclusion of these measures in the Draft Report and are encouraged that evolving federal and USACE guidelines may provide for additional incorporation of natural and nature-based solutions as policy and regulations are updated.
- **Gates** – The city wants to work with USACE to re-examine the number of gates in PED phase. USACE will complete additional risk assessments in PED phase that will help assess the integrity of the storm surge wall and inform the need for and location of the gates. We look to employ as few gates as possible, while maintaining target levels of protection, to ensure that people and goods flow easily in and out of the city, and to access the water’s edge. In addition, the city’s ability to operate and maintain the system is a function of the number and type of gates. In particular, we desire to conduct a more in-depth analysis of the location and function of the two gates currently planned for Lockwood Boulevard around the Medical District.
- **Phasing** – Although the project has been studied as one single project, the four segments defined in the development of the TSP are the logical segments for discussing a phased approach to design and construction. As currently planned, the Marina/Lockwood Boulevard area would be the first area constructed since it is the area where the majority of our critical community lifelines are located. In conjunction with this Phase 1 area, we will work with communities identified for flood proofing and strive to incorporate those actions into the early stages of construction. Likewise, the city will explore opportunities using other federal, state and private funds for complimentary actions within these neighborhoods to improve resilience in addition to the actions being proposed in the Draft Report.
- **South Carolina Ports Authority (SCPA) Property** – Currently, the city is in discussions with the SCPA for potential re-alignment of the wall along SCPA property. The re-alignment would better support the needs of east side residents while not negatively impacting the maritime operations of Columbus and Union Pier Terminals. This realignment opportunity was not available to the team during the feasibility phase of the study. In a letter dated 21 June 2021, the SCPA acknowledged that they are not ready to be definitive on the exact location of the wall on their property, but are prepared to work on solutions that protect critical port operations. SCPA anticipates that as negotiations on the re-development of Union Pier are resolved over the next

30 months, provisions for the location of the storm surge wall may be included in any agreement. Such re-alignment may include a re-alignment of the storm surge wall to the eastern boundaries of both Terminals. These re-alignments could result in cost savings and more robust community acceptance of the storm surge wall in this area. These adjustments will need to be completed before and during PED as part of real estate acquisition and ongoing negotiations.

- **Community Engagement** - We are strongly committed to the community engagement process in all phases of PED and have established the City of Charleston 3x3x3 Citizens' Advisory Committee comprised of leadership from impacted neighborhoods, industries, and conservation and historic preservation advocates. An essential part of that community engagement process is to ensure that equity, inclusion and environmental justice are key considerations of all decisions. The transition from an Environmental Assessment to a full Environmental Impact Statement has been a key step to ensure that the community's voice is heard and our collective needs are met. We look forward to the USACE's continued and active partnership in the community engagement process.
- **Historic Preservation** - The Charleston peninsula is home to nationally significant historic districts and properties that must be preserved at the highest level as an integral part of the community's life and character, as well as the tourism economy. Preservation of these historic resources is in the public interest, and the City of Charleston is committed to protecting its historic and cultural assets, both on and off the peninsula. As such, the city commits to work with the USACE to design a storm surge wall to avoid and minimize elements or features that may have an adverse effect on historic properties. We look forward to continued participation, along with our community advocacy groups, in the Section 106 process as outlined in the Draft TSP Report and associated Programmatic Agreement.
- **Urban Design** - As we move into PED, it is critical to design a storm surge wall consistent with the design principles that have guided Charleston's development for hundreds of years. Charleston has strict design standards with commissions and boards that maintain this legacy. We are optimistic that a storm surge wall can be built that embraces Charleston design standards while maintaining USACE requirements; if successful Charleston and the USACE can lead the way and demonstrate that building resilient, protective infrastructure can be done in a historic city. We are prepared to consider funding betterments that are merited but exceed Federal investment criteria after all mitigation cost sharing opportunities are considered. Likewise, the storm surge wall must, to the maximum extent practicable, be designed and built as an amenity for the community with access and opportunity for recreation along the Cooper and Ashley rivers, their marshes and waterfronts, and to the Charleston Harbor while providing protection from storm surge. Access to our water's edge on both sides of the peninsula is vital to the culture of Charleston and critical to our community's tourism industry and economy.

Our recently updated City Comprehensive Plan, in its land and water analysis section, assumes that a perimeter protection system will be built around the peninsula. The peninsula is the portion of the city with the highest population, including large public investments in affordable housing. As we seek

additional resources for larger projects that bring equitable opportunities to all of our citizens throughout the peninsula and city, the protection provided by the TSP will be a marquee project that demonstrates the city's commitment to address environmental justice for those in our city that are struggling for places to live and thrive, lacking connections to the water and natural environment, needing adequate stormwater infrastructure, or who are concerned about future flooding impacts.

The city intends to update its Downtown Plan that will shape the build out of the peninsula for the next 30 years. A potential addition to the Downtown Plan will be a comprehensive water plan that will holistically integrate water management solutions- for tidal, storm surge, and ground water, and possibly storm surge wall wave overtopping. The city looks forward to providing USACE with new information/reports throughout the PED phase.

The City of Charleston values this engagement with the USACE to address our priorities while providing surge protection for the Peninsula. We agree that perimeter protection is needed to protect its vital assets. Working with the USACE on the TSP will be the anchor project to assist the City in transforming the way we live with water as sea levels rise and extreme water events continue to increase.