

From: Karen Poeschel
kbpoeschel@gmail.com

February 12, 2020

Floating duplex owner on NE Bridgeton Road

To: Laura Hicks
Project Manager
PMS-Feasibility@usace.army.mil

Re: USACE Feasibility Study Comment

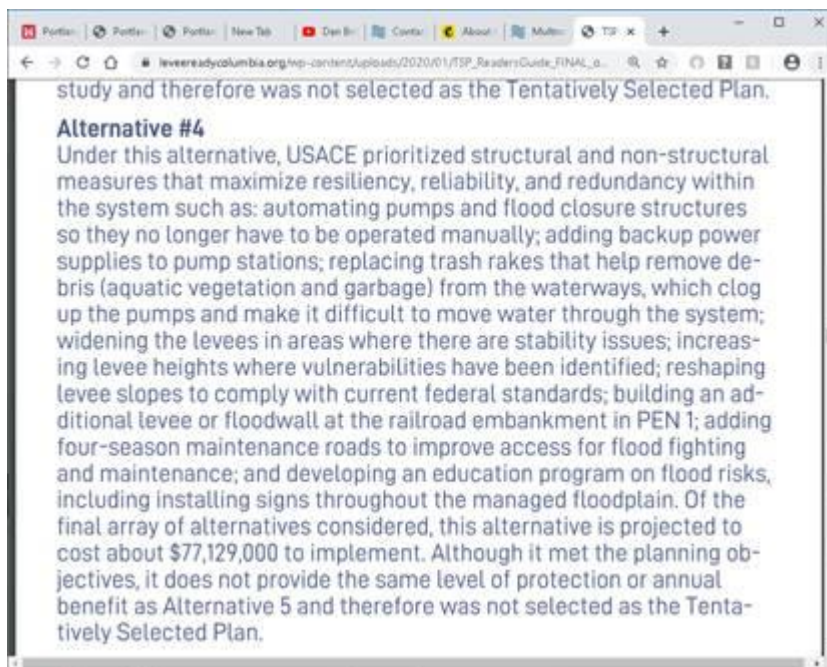
Hello Ms Hicks,

I am Karen Poeschel, an owner of a floating home that is a duplex. I live in one unit and rent the second. I am a 65 Viet Nam Era veteran and my retirement nest egg is invested in my floating duplex. If Alternate 5 is implemented, the loss of equity in my home will be twofold since my income is augmented with the rental portion of my duplex. Alternate 5 will destroy my property value, ruin my chances of renting my 2nd unit, and leave me with few options in my retirement.

I have read many responses on the inaccuracies of the report that selects Alternative 5 as the tentative plan. Beyond these inaccuracies, I question why Alternative 5 was selected given the following:

1. Alternative 4 met all planning objectives.

https://www.leveereadycolumbia.org/wp-content/uploads/2020/01/TSP_ReadersGuide_FINAL_online-1.pdf



2. Alternative 4 has a higher cost-benefit ratio and is one half the cost of Alternative 5
<https://usace.contentdm.oclc.org/utis/getfile/collection/p16021coll7/id/13101>

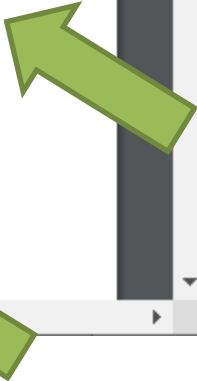
Integrated Feasibility Report and Environmental Assessment

tentatively selected plan is evaluated with a more detailed Micro-Computer Aided Cost Estimating System (MCACES) estimate. Cost figures in the table will vary from the more detailed estimates shown for the TSP in Section 5.2 and 5.3 of this report.

Table 3-26 Alternative-Level Annual Costs and Benefits (FY 20 Price Levels and 2.75% Discount Rate)

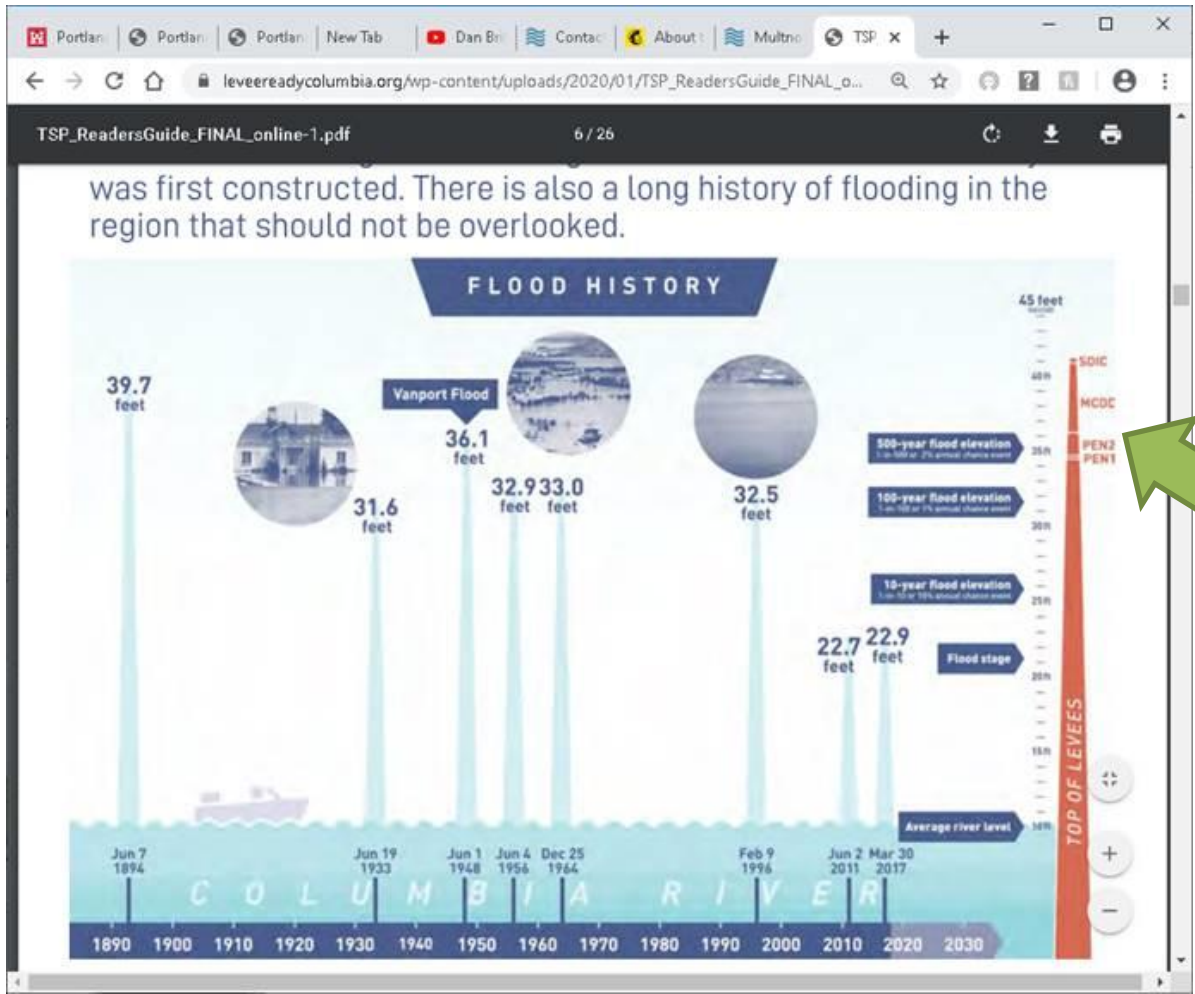
Item Description	Alternative 3	Alternative 4	Alternative 5
Construction Costs	\$21,636	\$35,172	\$75,562
Preconstruction Engineering/Design	\$2,597	\$4,221	\$9,068
Construction Management	\$2,164	\$3,518	\$7,557
Contingency	\$13,265	\$21,693	\$46,352
Real Estate (LERRDs)	\$8,904	\$9,513	\$19,018
Total Alternative Cost	\$48,566	\$74,117	\$157,557
Interest During Construction ¹	\$1,285	\$3,012	\$7,536
Total Investment Cost	\$49,851	\$77,129	\$165,093
Annualized Investment Cost ²	\$1,847	\$2,857	\$6,115
Annual O&M ³	\$19	\$26	\$34
Total Annualized Investment Cost	\$1,866	\$2,883	\$6,149
Annual Benefits	\$6,038	\$8,448	\$13,777
Annual Net Benefits	\$4,169	\$5,455	\$7,628
Benefit-Cost Ratio	3.24	2.93	2.24

Notes: Cost figures shown at FY2020 Price Level. All figures are in \$1,000s.
¹ Interest During Construction assumes equal annual outlays for construction periods of 24, 36, and 42 months for Alternatives 3, 4, and 5, respectively.
² Total Investment Cost is annualized using the FY2020 Federal Discount Rate of 2.75% and 50-year service life.



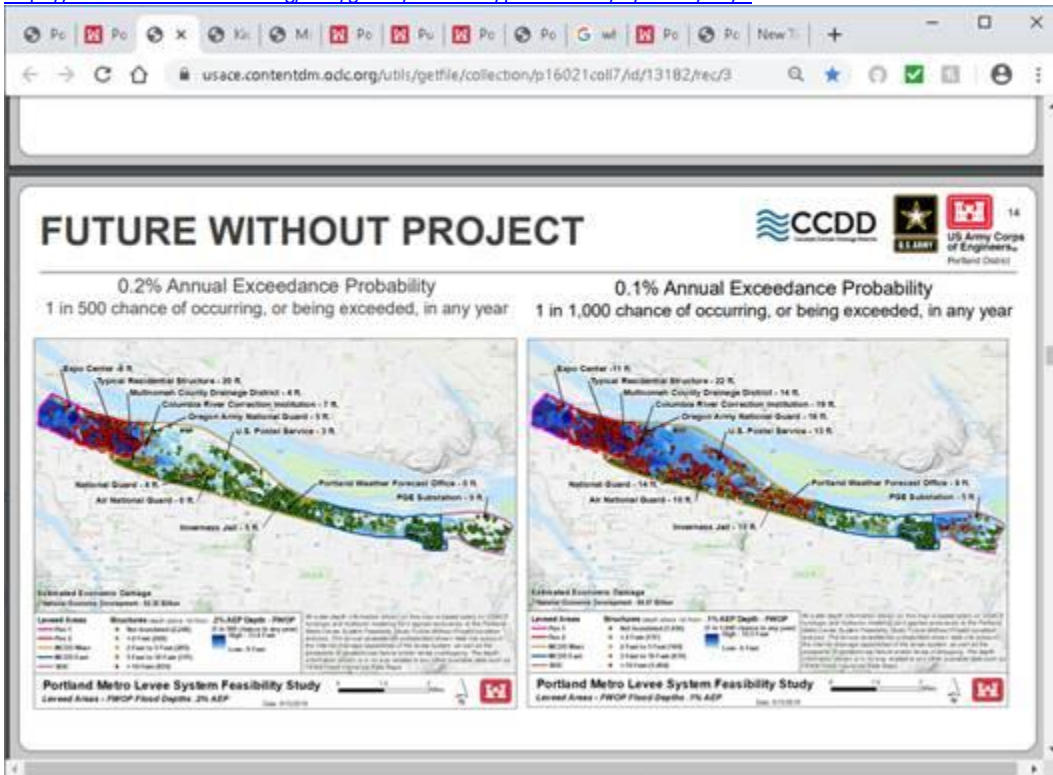
3. Alternative 4 would keep PEN 2 at approximately 35'+ that is already at the 500yr (AEP 0.2) level.

https://www.leveereadycolumbia.org/wp-content/uploads/2020/01/TSP_ReadersGuide_FINAL_online-1.pdf



4. Alternative 5: What AEP flood risk is it designed to handle? Is it equivalent to a 2,500yr flood? Or, in other words, a 4 in 10,000 chance of a 40' flood level. Is this a reasonable goal for the USACE?

<https://usace.contentdm.oclc.org/utlis/getfile/collection/p16021coll7/id/13182/rec/3>



- It would have been useful to have the model results for Alternative 4 and Alternative 5. Otherwise, there is not enough information to make an informed opinion regarding how these alternatives would help mitigate flood events.
- From Levee Report:
For Alternative 5, levee performance and quantities developed correspond to using a water surface elevation at the 0.2-percent annual exceedance probability (AEP) with an added 4 feet to provide more uniform AEP across the various levee segments. Where the water surface elevation exceeded the top of the existing levee for this scenario, an existing condition was evaluated within the geotechnical model by raising the levee to match the water surface.
- Sandy's floodwall at 40'. Does having the Sandy River on their east border have anything to do with the higher wall requirements for Sandy?
- Above model shows a 1,000yr (0.1 AEP) model and, in general, Sandy is not flooding. If Bridgeton Road is to be at 40' just to be uniform with Sandy, what AEP is that?

Is my **guess/estimation** of a AEP 0.04 correct? or in old terminology, a 2,500yr flood?

Or to word it another way, does the AEP of Alternative 5 mean the goal is to protect for a 1 in 2,500 chance of a 40' level flood annually?

- Why wasn't the very important fact of Alternate 5's AEP included in the presentation? We are being asked to make comments without critical information needed to form an educated response. What is the AEP of Alternative 5 and is it a reasonable goal to try to achieve it at double the cost of Alternative 4?
- Will Alternative 5 devastate the Bridgeton community for a 1 in 2,500 (AEP 0.04%) annual chance of a 40' flood event? (Again, due to lack of facts, I am using my best **guessimation** for this AEP of 0.04% for Alternative 5.)
- Is a 2,500yr flood (0.04% AEP) risk even a reasonable goal? Is uniformity a reasonable design goal? Is this AEP the standard and a uniformity standard being used in other flood plains across the nation? How can the public weigh the cost verses risk of USACE's choice of Alternative 5 without knowing this critical information.

5. The public roll out of these Alternatives was misleading and incomplete. The public is left with an inaccurate impression as a result. Those who are aware of these inaccuracies have lost trust in the information communicated to the public.

- In the two presentations by the USACE, questions were not allowed until, in the 2nd meeting, the community forced a Q & A session. There is no way to ask the USACE a question and get it answered unless you waited in line at a table after one of the meetings. Even with this email address, USACE only wants comments.
- The presenter continually used 3' floodwall when the Civil Design Appendix clearly shows 4'-5' floodwall all the way down Bridgeton Road. A 4' to 5' floodwall is not something you can just hop over, or easily see over, like the presentation implied. Unfortunately, most of the attendees of the meetings still believe the floodwall on Bridgeton Road will be 3' and there is no easy way to correct their perception before the comment period ends. The Civil Design shows 4' to 5' floodwall which will have a drastically different look-n-feel than a 3' floodwall.
- In a meeting, a MCDD employee stated we are not at the 500yr flood level in PEN 2, yet MCDD's Flood History graph (above) from their Reader's Guide shows we are at the 500yr flood level. Again, the attendees left with the wrong impression and there is no easy way to correct this misinformation.
- There is not enough information to understand what Alternative 5's AEP is and if it is reasonable. Why, at double the cost of Alternative 4, was Alternative 5 chosen? Why is uniformity a design consideration? How low is the AEP for Alternative 5' - is it a unreasonable goal that USACE doesn't use for other flood plains across the nation?
- The impact to the community of Bridgeton was not addressed or mentioned. Property values in the whole community will tumble if Alternative 5 is selected.

- The total loss of property value for the floating homes was not taken into consideration. No value was placed on losing 74 parking spaces that are critical to the livability of the floating homes. No value was placed on all the other parking spaces that will be blocked by flood wall.
- Alternative 5 results in floating home owners being in violation of city requirements to provide 2 parking spaces per floating home. No mention of the impact of a floodwall to the floating home community - no compensation for loss of use or loss of access to our property.
- All pilings for all floating homes will have to be driven deeper and raised at the tops to protect at a new level. This cost is not accounted for in the levee report.
- Bridgeton Road will become an unsafe 1-way street if the flood wall is erected.
- Bridgeton Road will not have sufficient/adequate room for emergency vehicles.
- Bridgeton Road will be a two-sided blank canvas for graffiti artists.

Six weeks has not been enough time for us to read, understand, formulate a plan of action and get the community involved and counted.

The selection of Alternative 5 is unreasonable given the information and lack of information that has been communicated.

I vote YES on Alternative 4 and NO on Alternative 5.

Karen Poeschel
