

To Whom It May Concern

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RE: Re-development of Hulls Creek property in Portsmouth, VA

Wetlands Watch is a 501(c)(3) nonprofit based in Norfolk, Virginia, working to conserve wetlands and the shoreline ecosystem in Virginia. We are also working extensively throughout the tidal portions of Virginia to help shoreline communities adapt to sea level rise.

I was a member of the Virginia Climate Change Commission which during 2008 examined the potential impacts of climate change on Virginia. Prior to this and before my work with Wetlands Watch, I spent 22 years employed as a senior staff member in the US House of Representatives working on science and environmental issues.

We were asked by citizens in the Port Norfolk neighborhood of Portsmouth to review the proposals for development on the Hulls Creek property, former site of the Port Norfolk School, based upon our work on sea level rise and inundation. I made a personal assessment of the site with a visit in January, 2011.

We concur with the changes to the site plan that have resulted in fewer houses in the "footprint" of the old Hulls Creek wetlands. This lower lying portion of the site will present increased inundation problems in the near future with sea level rise and storm surge inundation. We also know that Portsmouth has an innovative flood plain management program and requires freeboard (elevation above base flood elevations) in excess of the federal minimums. The use of impervious surface for development and redevelopment within Chesapeake Bay Preservation Act areas is also innovative.

Even with these improvements, we remain concerned about the long-term viability of this development.

Residential structures have an average useful life of 70 – 100 years; longer if property maintained. Any analysis of this development should use a similar time frame.

Sea level rise in our region has averaged 1.45 feet over the last century, as measured at the Sewalls Point tide gauge. Predictions for sea level rise over the next century have been estimated by the federal government and the Virginia Climate Change Commission to range between 2.3 and 5.2 feet, with 3 feet being the current best estimate of the minimum expected.

Portsmouth, as with most of the lower-lying cities in Hampton Roads, is experiencing inundation events and property losses from the sea level rise we have already experienced. Portsmouth, as many Hampton Roads cities, has taken measures to address this flooding, such as the elevation of Crawford Avenue. All of us in Hampton Roads are seeing regular inundation of streets that, when laid out during

our grandparent's time, were only infrequently inundated. This will continue and accelerate in the coming century.

During the projected useful life of the Hulls Creek redevelopment, tidal flows and storm surge inundation will creep higher and higher onto the land and adjacent creeks. As well, the land that was formerly creek bed and wetlands will sink.

As residents of older cities in Hampton Roads know, filled in creeks and wetlands present the greatest inundation threat as localized subsidence becomes a problem. Old marsh peats, disaggregated fill, former landfill debris and the like underlying older filled in wetlands will compact over time. This compaction and subsidence will accelerate with more frequent inundation events, again a fact of life in older parts of our region. This is in part the problem being seen in Portsmouth's Old Town, at least the parts of Old Town built upon marsh fill.

All of this presents a long-term risk to redevelopment in areas like Hulls Creek and these factors must be taken into account before redevelopment occurs. While the projected net tax revenues for this project are positive in the short run (post development), consideration must be given to what the net revenues will be over the useful life of this project, again a century into the future.

What will the costs be to raise and replace infrastructure? What will the cost be to adjust the drainage outflows under Detroit Street of the lower portions of this property as the hydrology changes? As 100 year flood zones become 25 year flood zones, are the precautions taken today to avoid repetitive loss going to be adequate? What will happen to property values (and property tax revenues) if the withdrawal of private insurance coverage continues? (We have documented the withdrawal of new coverage by Allstate, State Farm, Nationwide, Farmers, USAA, Mutual of Virginia, and other private insurance providers for tidal shoreline properties in Virginia.)

These are the questions that all communities along the tidal reaches of Virginia will need to ask prior to making development and redevelopment decisions. In our opinion, those are the considerations that any municipality needs to make prior to exposing the tax base to long-range and unknown costs along the shoreline.