



CITY OF
JOHNSTOWN
"A Home Rule Municipality"

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December 3, 2015

Steven L. Stockton
Director of Civil Works
U.S. Army Corps of Engineers

Lisa Kiefel
Planning Portfolio Manager
U.S. Army Corps of Engineers

Re: City of Johnstown, PA Request for Feasibility Studies Under WRRDA Section 7001

Dear Director Stockton and Planning Manager Kiefel:

The City of Johnstown is pleased to submit this letter to the U.S. Army Corps of Engineers (Corps), conveying Johnstown's interest in working in collaboration with the Corps on three (3) feasibility studies necessary to support Johnstown in critical flood control, riverine shoreline, aquatic ecosystem restoration, and water recreation projects. Johnstown submits this letter in response to the Corps' call for proposals from non-federal parties for feasibility studies or modified authorizations for water resources development projects, pursuant to Section 7001 of the Water Resources Reform and Development Act.

The Corps has been a critical partner with Johnstown for more than 125 years now, since the early days when the Corps was part of the response and recovery from the Great Flood of 1889, through the devastating floods of 1936 and President Franklin Delano Roosevelt's riverside declaration that the nation would help stop the flooding, through to the Flood Control Act of 1936 and the construction by the Corps of the-then largest flood control system in the nation, between 1938 and 1943. Through this "Johnstown Local Flood Protection Project" (JLFPP), the Corps deepened and realigned the channels of the Stonycreek and Little Conemaugh Rivers, excavated three million cubic yards of earth and rock, and built nine miles of side slopes with enough concrete to pave a two-lane highway sixty-two miles long. This critical system has protected Johnstown for decades, and helped the city withstand another terrible flood in 1977. Since those early days of collaboration, the Corps has continued to be a critical partner, through the maintenance of channels, the maintenance of flood walls and side slopes, the restoration of shorelines, the upgrading of critical infrastructure, and the establishment of new recreational resources on the

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waterfront. This includes a major, \$32 million rehabilitation of the JLFPP to ensure the structural reliability of flood walls, including non-federally constructed walls, pursuant to the 1991 Energy and Water Development Appropriations Act (P.L. 101-514).

Johnstown needs more help and collaboration with the Army Corps now, as these JLFPP flood control measures deteriorate, the river channels become clogged with vegetation and debris, and as the greater Johnstown region seeks to build a more robust water recreational sector around this historic rivers through the expansion of our growing river boating and trails network.

However, Johnstown has not been working in sufficient collaboration with the Pittsburgh District of the Corps, as our previous, late patron on such collaborative activities with the Corps, the Honorable John Murtha, is no longer with Johnstown, and the Corps system for project planning and development has changed drastically. Johnstown is very pleased that Congress has established a new process, under WRRDA Section 7001, and that the Corps has reached out to seek proposals from communities like Johnstown that could potentially put our needs and priorities into consideration by the Corps and Congress through the Annual Report process.

Beyond responding to the request for Section 7001 proposals, this letter also respectfully requests the opportunity to more fully reengage with the Corps through the Pittsburgh District, and suggests that we meet with Pittsburgh District officials in early 2015 to discuss and evaluate the projects outlined in this letter.

Johnstown requests that the Corps consider and confirm that there are a federal interest and compelling reasons for the Corps to undertake feasibility studies and other support to help Johnstown address three key project areas: (1) **Repair and restoration of JLFPP flood channel structures** including deteriorated side slopes and flood walls on river channels and tributaries, maintenance of clogged channels, and potential removal of targeted segments of the flood control slopes for public waterway access; (2) **Aquatic ecosystem restoration of degraded river water quality from historic Acid Mine Drainage and coal refuse debris**, particularly through rerouting and improvement of one harmful outfall in the Stony Creek River channel and the elimination of coal refuse in riparian area; and (3) **Recreational enhancements** on the water resources, through the planning and construction of key segments of riverfront trails on the flood control structures, and through the deployment of a collapsible dam to support river borne recreational boating. Following are more details on these potential projects:

REPAIR AND RESTORATION OF FLOOD CONTROL STRUCTURES

Overview of Project: The flood control systems constructed on the Stonycreek River and Little Conemaugh Rivers in Johnstown were authorized in the Flood Control Act of 1936, constructed by the Corps between 1938 and 1943, rehabilitated after 1991, and since then repaired and maintained by the Corps. This system of walls and side slopes are meant to contain the rivers under 100-year flood conditions. Note that, under long-standing authority established in P.L. 101-514, the Corps has maintained responsibility for all operations and maintenance on these flood control structures, including channel maintenance, and such efforts are normally conducted on a seven to ten (7-10) year basis.

However, the flood control structures are deteriorating badly in some sections, and the channels have become clogged which, together, have posed threats of failure in key segments of the walls and side slopes on both the main river channels and on key tributaries, which could lead to substantial risk of future flood damage. Further, the clogging of the main river channels by trees, vegetation, and snagged debris and sediment has resulted in a major decrease in the flood management capacity of these systems, to the point that Johnstown estimates that the 100-year flood control capacity has been diminished to less than a 50-year flood management capacity, and perhaps as low as a 30-year flood capacity. In addition, there are some sections of flood wall that Johnstown seeks to have evaluated for removal or modification in a manner that is consistent with flood control, in order to provide needed public recreational access to the river. For these river wall modifications, Johnstown needs an assessment of the hydrology of the Johnstown Flood Control Project to determine the feasibility of removing sections of river wall at the Stonycreek River Park along Somerset Street in the Kernville neighborhood, and at Sandyvale Memorial Gardens in the Hornerstown neighborhood.

Project Information:

- 1.) **Non-Federal Sponsor:** The non-Federal interest that would act as the local project sponsor for this flood control structure restoration would be the City of Johnstown, PA. The City of Johnstown is the primary non-Federal entity that has contributed, and would continue to contribute, toward the non-Federal share of a feasibility study on this project.
- 2.) **Specific Proposal:** The City of Johnstown requests a feasibility study on the repair and restoration of flood control structures on the primary channels and main tributaries of the Johnstown Local Flood Protection Project, including a hydrological assessment of the feasibility of removing certain segments of flood walls for better riparian access.
- 3.) **Project Purpose:** Flood damage prevention, with a secondary purpose of water recreation.
- 4.) **Estimated Cost:** Because the City of Johnstown has not been adequately engaged with the Pittsburgh District to have made a recent determination of the potential costs of the flood system rehabilitation and restoration, we do not have a preliminary estimate of probable costs. Given the observed level of current deterioration of these flood control structures, Johnstown ventures that the \$32 million appropriated for JLFPP rehabilitation in 1991 is a good first estimate for the work that needs to be done now – perhaps \$30+ million in current dollars.
- 5.) **Anticipated Benefits:** The need for flood control in Johnstown cannot be questioned, given our history of flood damage and devastation. The Johnstown community continues to be arrayed along these rivers, including the downtown, a major hospital system, major federal/state highway and interstate rail infrastructure, historic neighborhoods, and major advanced manufacturing factories. The primary benefit of this proposed project, to determine the feasibility and plan for maintaining the integrity of the JLFPP flood walls and side slopes, and ensure that the Corps continues its responsibility to maintain the river

channels free from vegetation and debris, will be flood damage prevention. This will reduce property damage, potential threats to human life, insurance costs, and other harms. For example, the 1977 flood was a blow to Johnstown's fragile economy, with 85 deaths and \$300 million in property damage (in 1977 dollars). Many downtown firms damaged by the flood did not reopen or moved to the suburbs. Employment at Bethlehem Steel dropped by 4,000. Between 1970 and 1980, the city's population dropped from 42,221 to 34,221, a 19.4% decline, and the 1977 flood is a major reason why.

The secondary benefit of the project will be to determine the feasibility of opening these rivers to enhance boating and riparian recreational access for local citizens, and the burgeoning regional, natural resource tourism economy that has already flocked to Johnstown, helping relieve the city's persistent poverty and economic distress.

- 6.) **Local Support:** No person or organization in Johnstown questions the value of maintaining adequate flood protection. Beyond that foundational support, the City of Johnstown has worked closely with key community and regional organizations to explore, assess, and confirm the desire of the community for additional work on the JLFPP system as described in this proposed project. Johnstown has the strong support for this project from the Johnstown Redevelopment Authority, the Southern Alleghenies Planning and Development Council, the Community Foundation for the Alleghenies, Lift Johnstown, and the Greater Johnstown Regional Partnership – all of whom collaborated on the development of this Section 7001 letter.
- 7.) **Financial Capacity:** Although Johnstown continues to struggle economically, the city and its community allies are prepared to handle required cost share for potential Corps feasibility studies on this project and, over time, cost share for engineering and construction implementation of any resulting projects. This funding could be provided by the City through general reserves, bonding, and/or partnership with the Community Foundation for the Alleghenies and the Commonwealth of Pennsylvania.
- 8.) **Support from Non-Federal Interest:** The primary non-Federal interest proposing this feasibility study is the City of Johnstown which, with this letter, conveys its statement of support.

AQUATIC ECOSYSTEM RESTORATION OF DEGRADED STONYCREEK & LITTLE CONEMAUGH RIVERS

Overview of Project: Johnstown has suffered many challenges over the decades, beyond the floods. The industrial legacy of iron and steelmaking, and the coal mining associated with that manufacturing, has caused major impacts to the water quality and aquatic ecosystems of Johnstown's Stonycreek and Little Conemaugh Rivers. Abandoned mine drainage once turned our rivers orange and continues to degrade water quality, and coal refuse and slag piles along the rivers continue to impact water quality.

Although most of the responsibility for remediating these water quality challenges lie primarily with federal, state and local agencies outside of the Corps of Engineers, there is a clear Corps role on these aquatic ecosystem challenges. In 1994, the Corps completed an assessment of water quality, especially related to abandoned mine drainage issues on the Conemaugh River and its tributaries. That study made recommendations for action and, since 1994, much progress has been made, especially in the upper portion of the watershed that includes the Little Conemaugh and Stonycreek tributaries.

Now, Johnstown seeks to work with the Corps to re-evaluate the status of the aquatic ecosystem of the Conemaugh, Little Conemaugh and Stonycreek Rivers as they are impacted by abandoned mine drainage and coal refuse piles in riparian areas. This includes a major, problematic outfall of mine drainage into the Stonycreek River located near the iconic “Inclined Plane”, which has been assessed and engineered for structural changes under which the effluent would be routed underground rather into the river. Johnstown also seeks Corps support in studying the feasibility of removing coal refuse piles from the floodplain and riparian areas for both water quality improvements, and to support the conversion of these areas into new wetlands, parks, greenspaces and other uses that would reduce flood levels at Johnstown and/or reduce environmental degradation to the aquatic ecosystem.

Project Information:

- 1.) **Non-Federal Sponsor:** The non-Federal interest that would act as the local project sponsor for this flood control structure restoration would be the City of Johnstown, PA. The City of Johnstown is the primary non-Federal entity that has contributed, and would continue to contribute, toward the non-Federal share of a feasibility study on this project.
- 2.) **Specific Proposal:** The City of Johnstown requests a feasibility study on improvement of the aquatic ecosystem of the Stonycreek, Conemaugh and Little Conemaugh Rivers, as an update to the Corps’ 1994 study on these issues, particularly related to the reduction of abandoned mine drainage and the impacts of coal refuse debris on these water resources.
- 3.) **Project Purpose:** Aquatic ecosystem restoration, with a secondary purpose of water recreation.
- 4.) **Estimated Cost:** Preliminary estimate of costs is \$2 million for rehabilitation of AMD outfall at the Inclined Plane at Stonycreek, and up to \$3 million for coal refuse elimination.
- 5.) **Anticipated Benefits:** The primary benefit of this aquatic ecosystem project will be to reduce major ecosystem challenges on these rivers associated with substantial pollutant loads. The AMD outfall at the Inclined Plane is contributing as much as 1,000 gallons per minute of contaminated water to the Stonycreek, from the abandoned Bethlehem Mine 72 area of 8,540 acres of mined out area and a 5,000 acre contaminated mine pool holding nearly 4 billion gallons of contaminated water. These waters have very high acidity, manganese, iron and other water quality contaminants. Coal refuse piles line the rivers

upstream and along the riparian areas of the core Johnstown area, which both degrade water quality and prohibit the productive use of riparian lands that could support parks, community spaces, constructed wetlands, stormwater management, and other benefits.

- 6.) **Local Support:** The Johnstown community has been united in its 40+ year effort to address the massive ecological (and economic) damage done to the community and region from abandoned mine drainage and other environmental impacts from our industrial legacy. At this time, there are several entities actively engaged in continuing study, design, engineering and implementation of solutions to this challenge, including the City of Johnstown, the Pennsylvania Environmental Council, the Foundation for Pennsylvania Watersheds, Lift Johnstown, the Community Foundation for the Alleghenies, and other local, regional and Commonwealth of Pennsylvania organizations.
- 7.) **Financial Capacity:** Although Johnstown continues to struggle economically, the city and its community allies are prepared to handle required cost share for potential Corps feasibility studies on this project and, over time, cost share for engineering and construction implementation of any resulting projects. This funding could be provided by the City through general reserves, bonding, and/or partnership with the Community Foundation for the Alleghenies and the Commonwealth of Pennsylvania.
- 8.) **Support from Non-Federal Interest:** The primary non-Federal interest proposing this feasibility study is the City of Johnstown which, with this letter, conveys its statement of support.

PUBLIC RECREATION ASSOCIATED WITH WATERWAYS & CORPS STRUCTURES

Overview of Project: The greater Johnstown region cherishes its rivers, despite the challenges of flooding and pollution that have faced the community. This includes a burgeoning waterborne tourism and recreation industry that includes extensive kayaking and canoeing, as well as recreational trail hiking. Johnstown enjoys the Stonycreek Rendezvous Festival, which attracts as many as 1,000 kayakers and flatwater recreational boaters annually; the Coal Tubin' Festival; and the new AlleghenyX Fest, a major fall festival for kayakers, mountain bikers, and trail runners. Although Johnstown cherishes its Flood Protection System, its design and structure make public river access difficult, and limits the ability to utilize the water resource for waterborne recreation.

The Corps of Engineers has been a longtime partner in the effort to identify strategies for enhancing water recreational assets and opportunities in the context of its core flood control and aquatic ecosystem missions. This includes the Corps work on the "Conemaugh River Greenway Concept Plan: A Plan to Link the Communities and Heritage of the Conemaugh River Corridor from Johnstown to Saltzburg, Pennsylvania", a 1994 planning study conducted by the Corps as part of a river reconnaissance study, in partnership with the National Park Service and the Southwestern Pennsylvania Heritage Preservation Commission. It also includes a 1992 Corps reconnaissance report titled a "Collapsible Dam Study – Stonycreek River", which considered how a collapsible

dam project in the heart of downtown Johnstown on the Stonycreek River could provide enhanced opportunities for water recreation and tourism.¹

The opportunity for river and trail recreational projects in Johnstown is necessarily contingent on conducting work in and on the Corps-constructed, -maintained and -regulated flood control structures that form the Johnstown Local Flood Protection Project. River access depends on modification of targeted segments of flood walls and side slopes. Improved boating opportunities need a flatwater pool that a collapsible dam could support.

Further, there are critical gaps in the regional trail system in and around Johnstown that can only be connected through construction on Corps flood control structures. The “Pennsylvania Mainline Canal Greenway” is a trail system that includes the *Path of the Flood Trail* on the Little Conemaugh River and the *Conemaugh Gap Trail* on the Conemaugh River, while the “September 11 National Memorial Trail” includes the *Jim Mayer Trail* on the Stonycreek River and the *Path of the Flood Trail*. However, these trails have critical gaps that cannot be connected on in-land areas because of development barriers, and the only opportunity for filling these gaps would be through connecting the trails through either placing it on Army Corps land or right-of-way at the top of the Flood Protection Project walls, and/or at the base of the walls within the floodway. See the attached map. These critical gap areas include:

- The Jim Mayer Trail on the Stonycreek River has a gap between the Hornerstown area and downtown Johnstown. An in-channel trail could be constructed from the Army Corps ramp at the Johnstown Inclined Plane to a similar ramp in Hornertown (or to Sandyvale Memorial Gardens if the flood wall is removed there). In addition, a top-of-the-channel trail could be built from the Hickory Street Bridge to the Haynes Street Bridge around Kernville.
- The Conemaugh Gap Trail on the Conemaugh River has a gap in key sections between downtown Johnstown and the City’s west end. An in-channel trail could be constructed from the wooded hillside at the Inclined Plane to the Army Corps ramp at 6th Avenue in the Cambria City neighborhood. Further, a top-of-the-channel trial could be constructed from the Cambria Iron Trail Pedestrian Bridge to the Cooper Avenue Bridge (from Cambria City to Morrellville).
- Johnstown also seeks to determine the feasibility and hydrological impacts of removing sections of river wall at the Stonycreek River Park along Somerset Street in the Kernville neighborhood, and at Sandyvale Memorial Gardens in the Hornerstown neighborhood, for enhanced public, recreational and boating access. Johnstown also seeks Corps support in assessing the feasibility of creating a portage for canoes and kayaks around the highly-inaccessible Seward Dam on the Conemaugh River.

¹ While that 22-year old study found that there was not a sufficient benefit-cost ratio to support further development of the project by the Corps, Johnstown believes that the economics of waterborne heritage tourism have improved dramatically in the Johnstown area, that there will likely be a sufficient benefit of the project to support further Corps involvement, and that it is a good time to re-visit and re-assess this opportunity.

Project Information:

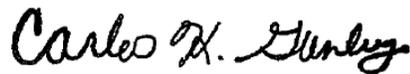
- 1.) **Non-Federal Sponsor:** The non-Federal interest that would act as the local project sponsor for this flood control structure restoration would be the City of Johnstown, PA. The City of Johnstown is the primary non-Federal entity that has contributed, and would continue to contribute, toward the non-Federal share of a feasibility study on this project.
- 2.) **Specific Proposal:** The City of Johnstown requests a feasibility study on the design and deployment of waterborne recreational enhancements and trail recreational facilities in, on, and around the Johnstown Local Flood Protection Project and adjacent riparian lands. This study should also include an evaluation of the potential hydrological and flood control impacts of removing targeted sections of the Flood Protection walls for enhanced river access.
- 3.) **Project Purpose:** Recreation, in the context of flood control efforts.
- 4.) **Estimated Cost:** As Johnstown has not been adequately engaged with the Corps Pittsburgh District on these projects yet, the City does not have a statement of probable costs. The 1992 Corps reconnaissance report on the collapsible dam on the Stonycreek River estimated \$2.2 million in costs (in 1992 dollars), but Johnstown is not sufficiently knowledgeable about the advances in such technologies to know whether costs would be approximately that of a decades-old study. Based on extensive Johnstown efforts to develop recreational trails, we believe that the filling of trail gaps on Corps facilities needs more approvals than it needs money, and that filling the critical trail gaps would cost approximately \$2 million.
- 5.) **Anticipated Benefits:** The Johnstown waterborne tourism and recreation sector, and its trail recreation system, already brings in more than \$10 million annually to this economically distressed, small community. Johnstown believes that the enhancements to waterborne and trail recreation proposed here will increase that economic benefit by as much as 25% annually. Johnstown needs every economic and quality of life benefit it can muster, and these river and trail enhancements could provide major benefit to the community and region.
- 6.) **Local Support:** There is an active effort underway by the City of Johnstown and key partners to enhance the regional tourism and riverine economy, and many organizations strongly support this call for the Corps' continued and reinvigorated involvement in this particular project. These organizations include the Community Foundation for the Alleghenies, Lift Johnstown, the Johnstown Area Heritage Association, and the Greater Johnstown Regional Partnership, among others.
- 7.) **Financial Capacity:** Although Johnstown continues to struggle economically, the city and its community allies are prepared to handle the required cost share for potential Corps feasibility studies on this project and, over time, cost share for engineering and construction implementation of any resulting projects. This funding could be provided by the City

through general reserves, bonding, and/or partnership with the Community Foundation for the Alleghenies and the Commonwealth of Pennsylvania. Lift Johnstown has already raised several million dollars in its ongoing commitment to fund the development of riverborne and trail recreational projects, and will continue to be a partner in these initiatives.

- 8.) **Support from Non-Federal Interest:** The primary non-Federal interest proposing this feasibility study is the City of Johnstown which, with this letter, conveys its statement of support.

Through its long struggles over the past 125 years, Johnstown has remained resilient and determined to move forward in progress. The rivers of Johnstown are central to our identity, and the development of these water resources is essential to our future. We must continue our investment in flood control, river ecosystem restoration, and river recreation. We cannot do this without the expertise, support and resources of the U.S. Army Corps of Engineers and other partners. This letter requests a renewed relationship between Johnstown and the Corps, and suggests projects that are worthy of new and renewed feasibility studies. We thank you for your consideration, and look forward to working with the Corps HQ Civil Works Program, the Corps Pittsburgh District, and the Pennsylvania congressional delegation to move forward on these important initiatives.

Sincerely,



Carlos Gunby
City Manager
City of Johnstown, PA

cc: Mayor Frank Janakovic
Col. Bernard R. Lindstrom, Commander, Corps Pittsburgh District
Lenna Hawkins, Deputy District Engineer, Corps Pittsburgh District
Brad Clemenson, Executive Director, Lift Johnstown
Mike Kane, Executive Director, Community Foundation for the Alleghenies
Mark Pasquerilla and Scott Roberts, Greater Johnstown Regional Foundation
Senator Bob Casey
Senator Pat Toomey
Congressman Keith Rothfus

