National Park Service
U.S. Department of the Interior

George Washington Memorial Parkway

# Dyke Marsh Wetland Restoration and Long-term Management Plan / Environmental Impact Statement

## *Public Comment Summary*
## *Alternative Concepts Newsletter*

***October 2012***

## INTRODUCTION

The George Washington Memorial Parkway released a newsletter detailing four alternative concepts for the Dyke Marsh Restoration and Long-term Management Plan / Environmental Impact Statement (plan/EIS) on April 24, 2012, and invited the public to attend a public meeting to learn more about these alternatives. A public scoping meeting to review the additional research and alternatives developed by the U.S. Army Corps of Engineers (USACE) following more than a year's worth of modeling and research was held on May 8, 2012, at the Washington Sailing Marina in Alexandria, and the public comment period was held open until June 20, 2012. At this meeting, representatives from NPS introduced the presentation, and later discussed the National Environmental Policy Act (NEPA) process; representatives from USACE presented the results of their research, that of research by the U.S. Geological Survey (USGS) to date, and four alternative scenarios for consideration in the plan/EIS. The alternative scenarios ranged from no action to full restoration. An open house format followed the presentation, and various stations were available to the public to ask questions and obtain information from NPS staff and assistants. During the scoping period, 611 pieces of correspondence with 643 signatures were entered into the Planning, Environment, and Public Comment (PEPC) system either through direct entry by the commenter or entering of emails, comment sheets, and hardcopy letters by NPS staff.

The comment cards distributed at the meeting and the Planning, Environment, and Public Comment (PEPC) Web portal for submitting comments electronically included the following three questions:

1. Are there other alternatives or elements that should be considered?
2. Do you have any concerns regarding the conceptual alternatives or elements presented?
3. What additional information or other comments do you have?

## NATURE OF THE COMMENTS RECEIVED

Correspondence was received during the public scoping period from 33 states and two countries (the United States and Great Britain). The majority of the comments were from Virginia (48%), with the next highest percentage of comments coming from Maryland and the District of Columbia, those areas immediately surrounding the marsh.

Comments expressed support or opposition for the four alternatives, and also asked what the costs would be or expressed concern over likely project costs. Many commenters expressed concern that the project would cause the Belle Haven Marina to close or would restrict or reduce recreational access and opportunities in the marsh. Several commenters suggested approaches that would allow the marina to remain open and still allow for restoration; for example, several suggested that alternative D should not include the option to fill the sailboat mooring area, and others suggested that the minimal or intermediate restoration alternatives would be more appropriate.

Several commenters also described the high-quality fishing grounds of the deeper holes in the marsh, and were concerned about the filling of these deeper areas. Other commenters were in favor of the restoration of wetland habitat for birds and other wetland-dwelling species.

## THE COMMENT ANALYSIS PROCESS

Comment analysis is a process used to compile and correlate similar public comments into a format that can be used by decision makers and the plan/EIS team. Comment analysis assists the team in organizing, clarifying, and addressing technical information pursuant to National Environmental Policy Act (NEPA) regulations. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process.

The process includes five main components:

- developing a coding structure
- employing a comment database for comment management
- reading and coding public comments
- interpreting and analyzing the comments to identify issues and themes
- preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topics and issues. The coding structure was derived from an analysis of the range of topics discussed during internal NPS scoping, past planning documents, and the comments themselves. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The NPS PEPC database was used to manage the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic and issue. Some outputs from the database include tallies of the total number of correspondences and comments received, sorting and reporting of comments by a particular topic or issue, and demographic information regarding the sources of the comments.

Analysis of the public comments involved the assignment of the codes to statements made by the public in their letters, email messages, and written comment forms. All comments were read and analyzed, including those of a technical nature; those expressing opinions, feelings, and preferences of one element or one potential alternative over another; and comments of a personal or philosophical nature.

Although the analysis process attempts to capture the full range of public concerns, this content analysis report should be used with caution. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. Furthermore, this was not a vote-counting process, and the emphasis was on the content of the comment rather than the number of times a particular concern was expressed.

## DEFINITION OF TERMS

Primary terms used in the document are defined below:

**Correspondence**: A correspondence is the entire document received from a commenter. It can be in the form of a letter, email, written comment form, note card, open house transcript, or petition.

**Comment**: A comment is a portion of the text within a correspondence that addresses a single subject. It could include such information as an expression of support for or opposition to the use of a potential management tool, additional data regarding the existing condition, or an opinion debating the adequacy of an analysis. Non-substantive comments are those comments that only express an opinion for or against a particular alternative or contain information that is outside the scope of the project. Non-substantive comments are read and coded, but not summarized in the Public Comment Summary Report below.

**Code**: A grouping centered on a common subject. The codes were developed during the scoping process and are used to track major subjects throughout the EIS process.

**Concern**: Concerns are a written summary of all comments received under a particular code.

Some codes were further separated into several concern statements to provide a better focus on the content of comments.

## METHODOLOGY

During the comment period for the draft plan/EIS, 611 pieces of correspondence were received into PEPC directly or were entered into PEPC for analysis. Each correspondence was read and specific comments within each correspondence were identified. A total of 1,312 comments were derived from the correspondences received.

Each comment was given a code to identify the general content of a comment and to group similar comments together. Sixty-four codes were used to categorize all the comments received. An example of a code developed for this project is *AL5200—Support Alternative Concept D: Full Restoration*. In some cases, the same comment may be categorized under more than one code, reflecting the fact that the comment may contain more than one issue or idea.

Under each code, all comments were grouped by similar themes, and those groups were summarized with a concern statement. For example, under the code *OI1000— Other Issues: Marina Comments*, one concern statement identified was, "Commenters stated the importance of Belle Haven marina to the community and requested that it not be changed, closed, or removed. Commenters requested that the marina be maintained and improved, with some suggesting an extended "no wake" zone by the marsh or building a seawall to protect the marina. Commenters also asked for clarification on how the alternatives would impact the marina and the sailing school." This one concern statement captured several comments.

Approximately 23% of the comments received related to *OI1000— Other Issues: Marina Comments* and the majority of these comments reflected the concern statement above. Approximately 16% of the comments were mapped to the code *AL5300—Oppose Alternative Concept D: Full Restoration*. The majority of comments (58.33%) were from unaffiliated individuals; 16.67% of the comments were from conservation/preservation organizations.

## GUIDE TO THIS DOCUMENT

This report is organized as follows:

**Content Analysis Report**. This is the basic report produced from PEPC that provides information on the numbers and types of comments received, organized by code and by various demographics. The first section is a summary of the number of comments that fall under each code or topic, and what percentage of comments falls under each code.

Data are then presented on the number of correspondences received by organization type (e.g., organization, government, individual); and the number of correspondences received by state.

**Public Comment Summary**. This report summarizes the substantive comments received during the scoping process. These comments are organized by codes and further organized into concern statements.

# CONTENT ANALYSIS REPORT

## COMMENT DISTRIBUTION BY CODE

*(Note: Each comment may have multiple codes. As a result, the total number of comments may be different than the actual comment totals.)*

| Code | Description | # of Comments | % of Comments |
|---|---|---|---|
| AL1000 | Alternatives: Elements Common To All Alternatives | 17 | 1.22% |
| AL1100 | Alternatives: Environmentally Preferable Alt./NEPA § 101 & 102. | 1 | 0.07% |
| AL2000 | Alternative Concept A: No Action | 1 | 0.07% |
| AL2200 | Support Alternative Concept A: No Action | 63 | 4.54% |
| AL2300 | Oppose Alternative Concept A: No Action | 20 | 1.44% |
| AL3000 | Alternative Concept B: Minimum Restoration | 16 | 1.15% |
| AL3200 | Support Alternative Concept B: Minimum Restoration | 81 | 5.83% |
| AL3300 | Oppose Alternative Concept B: Minimum Restoration | 11 | 0.79% |
| AL4000 | Alternative Concept C: Moderate Restoration | 27 | 1.94% |
| AL4200 | Support Alternative Concept C: Moderate Restoration | 60 | 4.32% |
| AL4300 | Oppose Alternative Concept C: Moderate Restoration | 10 | 0.72% |
| AL5000 | Alternative Concept D: Full Restoration | 38 | 2.74% |
| AL5200 | Support Alternative Concept D: Full Restoration | 90 | 6.48% |
| AL5300 | Oppose Alternative Concept D: Full Restoration | 212 | 15.26% |
| AL5400 | Marina Comments | 2 | 0.14% |
| AL5500 | Materials for Restoration | 9 | 0.65% |
| AL6000 | Containment Structures Layout | 3 | 0.22% |
| AL6100 | Containment Structure Options | 3 | 0.22% |
| AL7000 | Alternative Concepts: Cost | 87 | 6.26% |
| AL7100 | Alternative Concepts: Cost (Non-Substantive) | 1 | 0.07% |
| AL8000 | Alternative Concepts: New Alternatives Or Elements | 86 | 6.19% |
| AE1000 | Affected Environment: Non Substantive | 14 | 1.01% |
| AE13000 | Affected Environment: Cultural Resources | 1 | 0.07% |
| AE2000 | Affected Environment: Soils | 1 | 0.07% |

| Code | Description | # of Comments | % of Comments |
|---|---|---|---|
| AE22000 | Affected Environment: Visitor Use | 1 | 0.07% |
| AE3000 | Affected Environment: Water Resources General | 1 | 0.07% |
| AE3200 | Affected Environment: Hydrology and Hydraulics | 3 | 0.22% |
| AE4000 | Affected Environment: Floodplains | 1 | 0.07% |
| AE5000 | Affected Environment: Wetlands | 2 | 0.14% |
| AE6000 | Affected Environment: Natural Resources General | 2 | 0.14% |
| AE6200 | Affected Environment: Invasive and Exotic Plant Species | 1 | 0.07% |
| AE6300 | Affected Environment: Fish & Wildlife | 5 | 0.36% |
| AE6400 | Affected Environment- Species of Special Concern | 1 | 0.07% |
| AE7000 | Affected Environment: Air Quality | 3 | 0.22% |
| CC1000 | Consultation and Coordination: General Comments | 21 | 1.51% |
| CR4000 | Cultural Resources: Impact Of Proposal And Alternatives | 1 | 0.07% |
| FP4000 | Floodplains/Flooding: Impact of Proposal and Alternatives | 5 | 0.36% |
| GA1000 | Impact Analysis: Impact Analyses | 24 | 1.73% |
| GA1050 | General Benefits of Restoration | 20 | 1.44% |
| GR4000 | Geologic Resources: Impact Of Proposal And Alternatives | 5 | 0.36% |
| MT1000 | Miscellaneous Topics: General Comments | 19 | 1.37% |
| OI1000 | Other Issues-Marina Comments | 302 | 21.74% |
| OI1100 | Other Issue - Marina Comments (Non-Substantive) | 11 | 0.79% |
| ON1000 | Other NEPA Issues: General Comments | 2 | 0.14% |
| PN3000 | Purpose And Need: Scope Of The Analysis | 15 | 1.08% |
| PN4000 | Purpose And Need: Park Legislation/Authority | 5 | 0.36% |
| PN4050 | Park Legislation and Authority: Non Substantive | 1 | 0.07% |
| PN6000 | Purpose And Need: Land Management Laws, Exec Orders | 1 | 0.07% |
| PN8000 | Purpose And Need: Objectives In Taking Action | 6 | 0.43% |
| TQ1-47011 | Are there other alternatives or elements that should be considered? | 10 | 0.72% |
| TQ2-47011 | Do you have any concerns regarding the conceptual elements that are presented? | 12 | 0.86% |

| Code | Description | # of Comments | % of Comments |
|---|---|---|---|
| TQ3-47011 | What additional information or other comments do you have? | 11 | 0.79% |
| TR4000 | Transportation (land and water): Impact of Proposal and Alternatives | 5 | 0.36% |
| VE4000 | Visitor Experience: Impact Of Proposal And Alternatives | 17 | 1.22% |
| WH4000 | Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives | 17 | 1.22% |
| WQ4000 | Water Resources: Impact Of Proposal And Alternatives | 5 | 0.36% |
| **Total** | | **1,389** | **100%** |

## CORRESPONDENCE SIGNATURE COUNT BY ORGANIZATION TYPE

| Organization Type | # of Correspondences | Percent |
|---|---|---|
| Civic Groups | 2 | 0.33% |
| Conservation/Preservation | 9 | 1.47% |
| County Government | 2 | 0.33% |
| Non-Governmental | 1 | 0.16% |
| Recreational Groups | 3 | 0.49% |
| State Government | 5 | 0.82% |
| Unaffiliated Individual | 589 | 96.40% |
| **Total** | **611** | **100.00%** |

## CORRESPONDENCE DISTRIBUTION BY STATE

| State | Percentage | # of Correspondences |
|---|---|---|
| Virginia | 81.3% | 497 |
| Maryland | 10.0% | 61 |
| District of Columbia | 5.9% | 36 |
| New Hampshire | 0.3% | 2 |
| Ohio | 0.3% | 2 |
| Virgin Islands | 0.3% | 2 |
| Texas | 0.2% | 1 |
| Vermont | 0.2% | 1 |
| Oregon | 0.2% | 1 |
| Pennsylvania | 0.2% | 1 |
| South Carolina | 0.2% | 1 |
| Iowa | 0.2% | 1 |
| New Mexico | 0.2% | 1 |
| North Dakota | 0.2% | 1 |
| North Carolina | 0.2% | 1 |
| Minnesota | 0.2% | 1 |
| New Jersey | 0.2% | 1 |
| **Total** | **100%** | **611** |

## CORRESPONDENCE DISTRIBUTION BY COUNTRY

| Country | Percent | # of Correspondences |
|---|---|---|
| Great Britain | 0% | 1 |
| USA | 100% | 610 |
| **Total** | | **611** |

# PUBLIC COMMENT SUMMARY

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| ***AL1000 - Alternatives: Elements Common To All Alternatives*** | |
| Concern Statement: 39752 | Under all alternatives, commenters expressed support for erosion and restoration measures such as a new breakwater in the south marsh, placement of fill in dredged-out areas, native plantings, and invasive species control. |
| 39754 | Commenters requested that the plan provide additional information for all alternatives including maps to better describe the alternatives, the advantages of each option, the effectiveness of each option, and how much restoration is needed. |
| 39756 | Commenters expressed concern with the foundation of the alternatives, including the use of limited environmental surveys and basing the alternatives on historic reconstruction and bathymetry data. They also expressed concern that the alternatives do not address restoration, but new construction. One commenter requested that that use of fill material at the end of Haul Road be evaluated to see if anything needs to be removed before more fill is placed. |
| ***AL1100 - Alternatives: Envir. Preferable Alt./NEPA § 101&102.*** | |
| 39758 | One commenter requested that the environmental preferable alternative be a combination of alternatives that achieve environmental restoration objectives with limited conversion of existing aquatic habitat, and without pitting the interests of all uses and user groups against each other. |
| ***AL2000 - Alternative Concept A: No Action*** | |
| 39760 | One commenter requested that alternative A be modified to include the upgrading of the current facilities and launch area to assure safe and easy access to the river for fishing, and to support the sailing school activities that use it as a base. |
| ***AL2200 - Support Alternative Concept A: No Action*** | |
| 39762 | Commenters expressed support for alternative A, stating that the status quo should be maintained and expressed concern that any alternative other than A would impact wildlife habitat and reduce recreational access. Commenters also favored A because they were concerned that the other alternatives would cost too much. Commenters also included additional suggestions for alternative A such as the addition of a jetty. |
| ***AL2300 - Oppose Alternative Concept A: No Action*** | |
| 39764 | Commenters expressed opposition for alternative A, with many stating that this alternative does not do enough to preserve the wetland, protect the environment, and stop erosion. |
| ***AL3000 - Alternative Concept B: Minimum Restoration*** | |
| 39766 | Commenters expressed concerns with alternative B including that it would create a safety concern for smaller craft by forcing them into more exposed areas of the Potomac River. They also expressed concern that filling under alternative B would create a stagnant back-water area around Belle Haven Marina that could lead to silting of the marina. Other concerns with alternative B included impacts to spawning habitat, dredge spoils being blown out by frequent flooding (a concern for alternatives B and C), and the lack of adequate facilities elsewhere (a concern for alternatives B, C and D). |
| 39768 | Commenters provided suggestions for changes or additions to alternative B including:<br>- Removal of Phase 2 and 3 features from the alternative.<br>- Filling several acres north of the all to enhance storm surge dissipation.<br>- Implementing a phased approach.<br>- Additional wetland creation (referred to as alternative B with further design considerations).<br>- Less impact on deep water areas. |
| ***AL3200 - Support Alternative Concept B: Minimum Restoration*** | |

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| 39770 | Commenters expressed support for alternative B, stating that this alternative is preferable because it retains Belle Haven Marina and is the most cost effective. Commenters did note that they were in support of this alternative, with the removal of Phase 3, while others recommended alternative B initially be implemented, and alternative C elements added as the success of actions are evaluated and funding permits. |
| ***AL3300 - Oppose Alternative Concept B: Minimum Restoration*** | |
| 39772 | Commenters expressed opposition to alternative B, stating that it would not be effective, cost too much money, could reduce water flow and increase stagnancy (and concern for alternatives C and D as well), and would negatively impact access to Belle Haven Marina. |
| ***AL4000 - Alternative Concept C: Moderate Restoration*** | |
| 39774 | Commenters expressed concern with alternative C, stating that it would place marsh grasses in areas recreational boats currently travel and would impact Belle Haven Marina, with some feeling this would cause conflicts among user groups. Many commenters also stated that this alternative was cost prohibitive in this environmental climate. The Maryland Department of Natural Resources expressed concern that alternative C (as well as alternative D), have excessive fill of shallow water and deep water habitats. One commenter stated that alternatives C and D might affect the intact portions of the dikes at the southeastern section of the marsh. |
| 39776 | Commenters expressed concern with alternative C, stating that it would place marsh grasses in areas recreational boats currently travel and would impact Belle Haven Marina, with some feeling this would cause conflicts among user groups. Many commenters also stated that this alternative was cost prohibitive in this environmental climate. The Maryland Department of Natural Resources expressed concern that alternative C (as well as alternative D), have excessive fill of shallow water and deep water habitats. One commenter stated that alternatives C and D might affect the intact portions of the dikes at the southeastern section of the marsh.<br><br>Commenters offered suggestions for additions/changes to alternative C including:<br>- Adding dredging of the Belle Haven Marina mooring field and using that fill.<br>- Remove the element "Optimal placement of fill around Belle Haven Marina."<br>- Addition of fill in the southern area of the 1937 marsh.<br>- Phasing implementation.<br>- Preserving access to Belle Haven Marina. |
| ***AL4200 - Support Alternative Concept C: Moderate Restoration*** | |
| 39778 | Commenters stated support for alternative C, stating that they favored this alternative because it does not impact the operation of Belle Haven Marina, it is a reasonable and balanced approach, and it is the appropriate level of action to accomplish restoration. |
| ***AL4300 - Oppose Alternative Concept C: Moderate Restoration*** | |
| 39780 | Commenters stated opposition for alternative C, stating it would negatively impact Belle Haven Marina and be too costly. |
| ***AL5000 - Alternative Concept D: Full Restoration*** | |
| 35933 | Commenters expressed concerns with alternative D, primarily, what impact that implementation of the alternative would have on Belle Haven Marina, with many stating that this would remove the marina and/or impact recreational programs in the area. Other concerns included cost and would impact boating access. One commenter noted that it is wake actions from commercial ships on the river, and not activities at the marina that are causing erosion. Some commenters requested that alternative D be removed from consideration. |
| 39784 | Commenters provided additional elements or changes they felt should be part of alternative D, including:<br>- An option to feather the outer berm to grade into the Potomac.<br>- Removing one to three acres of fill around the Belle Haven mooring area<br>- Ensure that there are sufficient financial resources to implement this alternative<br>- Testing and demonstrating any dredge soil material is uncontaminated. |
| ***AL5200 - Support Alternative Concept D: Full Restoration*** | |

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| 39786 | Commenters expressed support for alternative D, stating that this area provide important habitat for many species in the area. Many commenters also expressed their support, conditioned upon preserving access to Belle Haven Marina as well as obtaining the needed funding. |
| ***AL5300 - Oppose Alternative Concept D: Full Restoration*** | |
| 39788 | Commenters stated opposition to alternative D, with many of them saying it is because Belle Haven Marina would be eliminated and because it is too costly. Other commenters were concerned about the level of engineering required under this alternative. |
| ***AL5400 - Marina Comments*** | |
| 39791 | One commenter stated that the marina and picnic area should be removed because they deflect the current away from Dyke Marsh. One commenter also questioned if the marina "bay" area should have a southern outlet into the river. |
| ***AL5500 - Materials for Restoration*** | |
| 39793 | Commenters asked questions regarding where fill materials would come from and expressed concern that non-native fill could impact existing wildlife and aquatic grasses. Specific concerns included that fill would be from the Potomac River and would be contaminated. Suggestions for using fill included consulting with the Virginia Institute of marine Science and conducting geotechnical borings to determine foundation conditions and potential sources of materials. |
| 39795 | Commenters asked that the element to receive dredge material from local projects be further developed. One commenter noted that they have dredging planned and discussed opportunities to donate the spoils. |
| ***AL6000 - Containment Structures Layout*** | |
| 39797 | Commenters stated that containment cells could be considered in the second phase of the project. One commenter expressed concern that filling cells in later phases may result in current remnants of tidal marsh being cut off from flows. |
| ***AL6100 - Containment Structure Options*** | |
| 39799 | Commenters expressed concern about the appearance of proposed structures, calling them unsightly. One commenter asked if other means, besides structures, could be used to protect from erosion and wave surges. |
| ***AL7000 - Alternative Concepts: Cost*** | |
| 39801 | Commenters asked that all alternatives include the cost as well as time to implement. They also questioned what funds were available for this project. Other commenters felt that the action alternatives were too great a cost to implement. |
| ***AL8000 - Alternative Concepts: New Alternatives Or Elements*** | |
| 39803 | One commenter suggested that the park should deepen and improve access to the marina, and use this fill as material. |
| 39805 | Commenters provided suggestions for elements related to access and recreation they felt should be part of the plan. Suggestions included: closing the river to traffic that erodes the marsh; include use of the marsh for fishing as a key element; attention to walking access; increased education; improved picnicking and play areas (with one commenter suggesting this should be done through removal of invasive species); provide canoe and kayak rental; additional signage, specifically for dogs on leash and hunting; improved waterfowling opportunities; redirecting the southbound bike path closer to the shoreline; allowing bikes on the Dyke Marsh trail; and adding benches. |
| 39806 | Commenters suggested combining elements of the existing range of alternatives to create a new alternative. Suggestions for such combinations included:<br>- Alternative D minus filling in the marsh where the mooring area is for Belle Haven marina.<br>- An alternative between C and D.<br>- An alternative between B and C.<br>- A blend of alternatives A and B. |

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| 39808 | Commenters provided suggestions related to dredging including dredging a deep channel from Four Mile Run out to the main river channel and then dredging the main river channel to allow nature to restore the marsh; dredging to address changes in the current from the construction of the Wilson Bridge; dredging the silted area of Hunting Creek and the sand bar in front of the marina; dredging upstream of the marina to restore the historical flow of the river in front of the mouth of Hunting Creek and the park to the south; and dredge the east-west Belle Haven channel and use the spoils to fill other areas. |
| 39811 | Commenters suggested additional structural elements including: concrete calming devices similar to those at Kent Island; a mechanism to keep plastic bottles and garbage from entering the wetlands; including a breakwater at the sound end of the marsh; and replacing Haul Road with a raised boardwalk. One commenter noted support for the use of structures in the alternatives. |
| 39814 | Commenters requested that NPS look at alternatives that go outside their boundaries. Such alternatives would include restoration outside the park boundary, consideration of the mid-river development (including upland and marsh habitat), multi-objective restoration to include all uses of the marsh; consideration of higher elevation areas;<br>They also suggested that NPS look at other areas for comparison including Blue Plains Flats and Craney Island. |
| 39815 | Commenters provided suggestions related to habitat restoration and removal of invasive species such as making sure professionals are used for invasive plant removal, an aggressive invasive species management plan, and the inclusion of plants for stabilization and habitat recovery. One commenter suggested that all replanting be done with native species. When looking at habitat restoration issues, commenters suggested coordination with the Virginia Institute of Marine Science and the US Army Corps of Engineers Coastal and Hydraulics Laboratory. |
| 39817 | Commenters provided suggestions related to fill including replacing the promontory in the south to protect from fill, using the already approved fill source from the Dogue Creek Marina Channel, and using fill from dredging around Belle Haven Marina at Haul Road. |
| 39820 | Commenters stated that this project should be phased, starting with the minimal amount of work needed. They also suggested monitoring occur as part of this process and the effects noted. |
| 39821 | Commenters suggested a mitigation alternative that includes structural fish enhancements (such as artificial reefs), and wildlife viewing stations, improved vehicle access to Gravely Point, and an alternative vessel landing/marina. |
| 39823 | One commenter provided law enforcement elements to be considered such as banning entrance or at least enforcing the rules on powerboats and fisherman and dog owners that do not keep their pets on leash. |
| 39825 | Commenters requested the plan create a no wake zone. |
| 39826 | The Maryland Department of Natural Resources requested that the Dyke Marsh restoration should include the following:<br>1. Continued public access,<br>2. Incorporation of numerous tidal guts including pools and deeper marsh channels to maximize the water/marsh interspersion to provide microhabitat to intertidal species and wildlife species,<br>3. Maintenance or improvement of hydrology and water quality,<br>4. Preservation of shoreline habitat and if hardened shoreline structures are used, these should be limited and non-contiguous,<br>5. Incorporation of native, vegetative plantings,<br>6. Incorporation natural material when feasible which are aesthetically appealing, and<br>7. Long-term post-restoration monitoring. |
| 39832 | One commenter suggested that total restoration effort should be well studied and documented by scientists and others to guide this and future restoration efforts. |
| ***AE2000 - Affected Environment: Soils*** | |
| 39726 | One commenter provided information on the current rate of loss of Dyke Marsh, expressing concern that it would disappear without action. |
| ***AE22000 - Affected Environment: Visitor Use*** | |
| 39728 | One commenter noted that the prior sand and gravel excavations have created conditions where multiple uses occur, and are competing, in the Dyke Marsh area. |

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| ***AE3000 - Affected Environment: Water Resources General*** | |
| 39731 | One commenter provided information on the historical condition of Dyke Marsh, including prior ownership, water depth, and vegetation. |
| ***AE3200 - Affected Environment: Hydrology and Hydraulics*** | |
| 39742 | Commenters noted the current hydrologic conditions of the Dyke Marsh area. One of these conditions is the water flow and/or fluctuations, including summer storm surges. One commenter suggested that the alteration of water flow caused by the construction of the Wilson Bridge may be contributing to the loss of wetlands at Dyke Marsh and should be considered. |
| ***AE6000 - Affected Environment: Natural Resources General*** | |
| 39744 | Commenters stated that any assertion that Dyke Marsh is the only remaining tidal wetland in the area is incorrect. They also noted that the area is important fish habitat. |
| ***AE6200 - Affected Environment: Invasive and Exotic Plant Species*** | |
| 39746 | One commenter questioned what plants species are considered exotic in Dyke Marsh. Specifically, they noted that recent work on *Phragmites communis* that should be considered before any removal of this species occurs. |
| ***AE6300 - Affected Environment: Fish & Wildlife*** | |
| 39748 | Commenters noted that Dyke Marsh provides important habitat for a variety of bird species (migratory and resident), fish, and plants. Specific comments included its importance as a migratory bird stop over ground and as a fish spawning area. |
| ***AE6400 - Affected Environment- Species of Special Concern*** | |
| 39750 | One commenter stated that Dyke Marsh provides habitat, nesting, foraging and shelter for migratory and resident waterfowl and other birds, over 270 species. They also noted that the area hosts migratory birds and is nesting habitat for the state-listed (protected) Marsh Wren and Least Bittern. They expressed concern about the decline of the marsh wren in the upper Potomac tidal zone. |
| ***CC1000 - Consultation and Coordination: General Comments*** | |
| 39830 | Commenters requested that the NPS conduct coordination with various federal, state and local agencies, and other organizations specifically:<br>- The involvement of the Regional Director of the Regional Hydrologist (Doug Curtis)<br>- The Maryland Department of Natural Resources<br>- Fairfax County Wetland Board<br>- The Virginia Institute of Marine Science<br>- U.S. Army Corps of Engineers<br>- The Belle Haven Sailing School |
| 39831 | Commenters expressed concern about the public scoping process including changing the online comment form, providing more time for comment, better advertising of meetings, meeting format (not allowing questions) and the locations where the meetings were held. One commenter also expressed concern about the lack of availability of reports and data.<br>In addition, they suggested additional outreach such as presentations on the character of marsh restoration. One commenter asked how a jpg map could be submitted. |
| 39834 | One commenter noted that there were misconceptions that Belle Haven Marina would be closed and these should be resolved. |
| ***CR4000 - Cultural Resources: Impact Of Proposal And Alternatives*** | |
| 39837 | Commenters expressed concern about the potential impacts to cultural resources. Specifically they asked whether the placement of the containment cells would impact archaeologically sensitive areas. |
| ***FP4000 - Floodplains/Flooding: Impact of Proposal and Alternatives*** | |

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| 39841 | Commenters expressed concerns regarding floodplains, including how this action would address current flooding issues in Belle View, New Alexandria/Belle Haven, and Huntington. One commenter was concerned that any restoration could be impacted by flooding. |
| 39843 | One commenter provided data to be considered in the planning process regarding elevation tests, scour, and floodplain elevation. |
| ***GA1000 - Impact Analysis: Impact Analyses*** | |
| 39871 | Commenters stated that the EIS should consider land use issues including considering the public use of the parcels under consideration, how limited access impacts economics in the area, and the impact to areas outside Dyke Marsh. Commenters also questioned what the impact to surrounding land uses would be from flooding, standing water, and other changes in water patterns. |
| 39873 | One commenter expressed concern that fill dirt for the project may result the wildlife refuge being disturbed. In addition to impacts to wildlife, they were also concerned about the costs of fill dirt. |
| 39875 | Commenters made suggestions regarding the analysis of biological resources, including suggesting that the park conduct multi-season biological assessments, specifically for resident and transient fish species (including threatened and endangered species). One commenter noted the multiple years required for field research that should be taken into account. Another commenter was specifically concerned with the loss of the Pumpkin Ash. Concern was also expressed as to what would happen to wildlife species that have adapted to the current situation. |
| 39877 | One commenter recommended that impacts be evaluated using both an environmental assessment approach (quantifying gain or loss of habitats) and an economics approach (assessment of recreation and eco-tourism gains or losses). |
| 39879 | Commenters asked that the plan analysis provide more information in regards to the importance of wetland restoration on water quality and habitat. One commenter requested more information be presented regarding what level of ecosystem services the fully restored marsh will provide the Potomac. Other information related to the water quality and flow that commenters asked for was the up and down stream impact on the river and the impact of the Wilson Bridge on the natural flow. |
| 39881 | Commenters asked that the role of climate change be considered in the analysis. |
| 39883 | One commenter asked that the plan consider the impacts of artificially restoring the marsh. |
| 39885 | One commenter questioned the impact to businesses in the area, such as Belle Haven Marina from taking the proposed action. |
| 39887 | One commenter requested the NPS look at case studies when developing the plan. |
| 39893 | One commenter requested the NPS conduct a quantitative analysis of the submerged aquatic vegetation (SAV) distribution in the project area and quantification of any unavoidable SAV impacts. They also requested the NPS provide options to mitigate any unavoidable impacts to SAV, with additional study if data gaps are found. |
| 39918 | NPS planners are incorporating adaptation to climate change in their restoration planning. DOI Secretary Salazar's September 14, 2009 directive established a framework for DOI bureaus to coordinate climate change science and resource management strategies. One element is crafting practical, landscape-level strategies for managing climate change impacts. The restoration of Dyke Marsh could be a national model in planning for adaptation to climate change, as it will be impacted by sea level rise.<br>A restored Dyke Marsh would offer more opportunities for young people, particularly those in a large metropolitan area to connect with nature and help NPS reach its goal to bring national parks to 25 percent of the school children in America.<br>I urge you to fully restore Dyke Marsh. |
| 39919 | In addition, NPS may want to account for future sea level change rather than basing restoration goals solely oil current or historic levels. This consideration would provide many long-term benefits in restoring Dyke Marsh. |
| 39921 | We also fully support the future research by UMES to model the impacts of restoration on the biota in the marsh and their suggestion to increase the elevation of the marsh due to sea-level rise. |
| ***GR4000 - Geologic Resources: Impact Of Proposal And Alternatives*** | |

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| 39859 | Commenters questioned what the causes of erosion are and noted various causes of erosion and how those causes could be impacted by this planning effort. One commenter noted that attributing erosion to the wake from boats is a broad generalization that does not take into account the size of boats or how they are operated. The commenter requested that the EIS look at how it characterizes impacts from small water craft to erosion. Another commenter stated that management upstream at Cameron Run should be considered when looking at erosion. |
| 39862 | One commenter stated that the plan appears to address Southern erosion with a breakwater but does not address Northern erosion. The commenter questioned what will prevent erosion on the Northern end. |
| ***OI1000 - Other Issues-Marina Comments*** | |
| 40551 | Commenters stated the importance of Belle Haven Marina to the community and requested that it not be changed, closed, or removed. Commenters requested that the marina be maintained and improved, with some suggesting an extended "no wake" zone by the marsh or building a seawall to protect the marina. Commenters also asked for clarification on how the alternatives would impact the marina and the sailing school. |
| 40679 | Commenters provided suggestions for changes to the marina they would like to see, including providing more parking for boat trailers, improving boating opportunities, improving the launch ramp, and building a jetty. One commenter suggested that the marina be limited to canoes, kayaks, sailboats, and paddleboats, while others suggested the addition of a snack bar and changing the concessionaire. |
| 40681 | One commenter stated that in a memorandum dated 14 Feb. 1964, Congressman Dingell said that it was illegal to have the marina, because the marina was small but still had an adverse influence on the marsh. |
| ***ON1000 - Other NEPA Issues: General Comments*** | |
| 39864 | Commenters stated that the EIS alternatives do not comply with NPEA because they do not consider a broad range of alternatives and form a narrow EIS scope. Specifically, commenters felt that restoration at alternative sites along the tidal Potomac River should be considered as well as alternatives outside of the jurisdiction of the agency. One commenter felt that the most environmentally beneficial and least cost alternative is located immediately outside the Dyke Marsh boundary to the north, and this alternative should be considered. |
| ***PN3000 - Purpose And Need: Scope Of The Analysis*** | |
| 39891 | Commenters requested the scope be expanded to look at all of the parcels on the site. One commenter stated that the EIS is flawed by not looking at the remainder of the NPS property. Other commenters requested that the scope be expanded to look at alternatives outside the park boundary. |
| 39895 | Commenters asked that the scope include consideration of public use and recreation. They asked that the rights to access the area be balanced with the need to protect it. One commenter requested GIS and mapping to show the current human uses of the area. |
| 39897 | Commenters questioned the timeframe the plan is looking at. One commenter felt that 1937 was an arbitrary date and another suggested the analysis timeframe begin when dredging stopped. |
| 39899 | One commenter requested that the NPS discuss how the anticipated outcomes of the alternatives would differ in environmental and recreational value, and in anticipated uses and access points for resulting marshland user. |
| ***PN4000 - Purpose And Need: Park Legislation/Authority*** | |
| 39866 | Commenters noted that the mission of the park calls for and is aligned with restoration, with some feeling that this is coming at the expense of outdoor recreation. |
| 39868 | One commenter noted that marsh restoration is one of the projects allowed under the Water Resources Development Act of 2007 and contributes to executive order 13508 Chesapeake Bay goals to recover habitat. |
| ***PN6000 - Purpose And Need: Land Management Laws, Exec Orders*** | |
| 39846 | One commenter stated that all of the alternative management proposals limit access for the public and the recreational boater, a management philosophy that directly contradicts the intent of President Obama in his America's Great Outdoors (AGO) Initiative. |

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| ***PN8000 - Purpose And Need: Objectives In Taking Action*** | |
| 39848 | Commenters questioned what the objectives of the plan are, with some feeling it should be complete restoration. Others felt that the purpose, need and objectives should balance restoration with access and recreation. |
| ***TR4000 - Transportation (land and water): Impact of Proposal and Alternatives*** | |
| 39850 | Commenters requested that the alternative not impact water based transportation, stating that they currently force smaller boat traffic more into the Potomac River. One commenter thought the alternatives would have beneficial impacts, providing more waterways for canoes and kayaks. |
| ***VE4000 - Visitor Experience: Impact Of Proposal And Alternatives*** | |
| 39901 | Commenters expressed concern that implementation of the alternative would limit access to recreation in the area, including boaters, fishing, and hunting. Some commenters expressed concern that the area would be closed for the benefit of one user group at the expense of the other. |
| 39903 | One commenter requested that the NPS consider the physical and mental health of individuals who go to Dyke Marsh for reflection and renewal and its value for plant life and insects. |
| ***WH4000 - Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives*** | |
| 39905 | One commenter provided information on a study of the mechanical removal of *Hydrilla verticillata*, stating that this study showed that the impacts of mechanical harvesting, at current levels, on fish distribution and abundance in the Potomac River are negligible. |
| 39907 | One commenter requested that the plan include an evaluation of the aquatic resources within Dyke Marsh. In this plan, the commenter requested NPS coordinate with U.S. Fish and Wildlife Service (USFWS). They noted data from the USFWS collected from 2001-2004 within Dyke Marsh that focused on rare, threatened or endangered (RTE) fish species such as Atlantic and shortnose sturgeon that should be considered and updated. |
| 39909 | Commenters generally asked what the impacts of the actions would be on wildlife. Specific questions asked included how work would proceed during the breeding season as well as what would be the impact to beaver huts in area. |
| 39911 | Commenters noted the importance of the marsh for bird habitat, specifically the Least Bittern and Wrens. Commenters asked that these species not be adversely impacted, noting the decline of the wren. |
| 39913 | Commenters expressed concern on what impact fill would have on the fish population, noting that reduction of marsh acreage would impact near-shore and shoreline fisheries habitat for largemouth bass. |
| ***WQ4000 - Water Resources: Impact Of Proposal And Alternatives*** | |
| 39915 | Commenters provided additional information they felt should be considered in the analysis of water resources, specifically the hydrology of the area. One commenter expressed concern that the change of water flow into the Potomac from the Cameron Run spillage after Hurricane Isabel is not considered. Other commenters noted alterations in hydrology that have occurred (such as sand and gravel excavations, filling of wetlands for commercial development, and constructing the Hunting Creek Outlet) that have changed how the natural system functions. They cautioned that any actions in Dyke Marsh should be analyzed to ensure they do not change the natural hydrology. |
| 39917 | Information about water movement in and around dense submersed macrophyte beds in tidal systems is important for understanding variations in diurnal dissolved-oxygen concentration, pH, suspended-sediment concentration, and distribution of zooplankton and phytoplankton. |