

Government and Organization Comments

All comments received on PEPC, at the public meetings, and at the Park, have been considered. This attachment only contains comments submitted by government agencies and non-profit organizations through PEPC, Email, or hard copy.

Please see the Public Comment Analysis Report for a summary of all comments received by all commenters.

Correspondence 1 (Email)

Author: Feld, David

Organization: GeesePeace

Supplementary Comments US National Park Service EIA for the Anacostia Wetlands Restoration project

These comments supplement the GeesePeace Management Plan dated August 9th 2007 to mitigate Canada geese herbivory which we submitted as an alternative approach. The following comments specifically address your other proposed options.

- Covering wetlands areas with fences.

We recommend continuation of the techniques you have already implemented. i.e. placing overhead wires with reflective tape. We do not recommend fences along the edges of the planted areas unless these fences are designed to allow passage of small reptiles and other beneficial wildlife. One design to consider would be to use buoys similar to the ones used to demark safe swimming areas. In this design the buoys will be placed closer together and reflective tape or another barrier would be placed on the buoys and the connecting lines. We have a design that we have used to keep geese from jumping on seawalls that could be adapted for this purpose.

- Using visual deterrents or repellents.

We recommend using "Flight Control", a goose repellent that gives geese a mild upset stomach so after awhile, they stop eating the grass. Flight Control has a "sticker" that keeps the repellent from washing off during wet conditions. It also has a visual marker that the geese can see so they know to not eat the grass where they see the marker.

However, we recommend that the repellent be first used on the grass areas, before the wetlands are planted so the geese learn that the vegetation with the marker is going to give them an upset stomach. Then when you use the repellent on the wetland vegetation the geese will already know to stay off because they have learned that the vegetation with the marker should be avoided. You do not want the geese to learn the lesson by eating the newly planted wetland areas.

The repellents would still need to be supplemented with the overhead wires and barriers as described above to get them from feeding on submerged vegetation.

- Addling eggs

We recommend egg oiling. We have a protocol for this that is effective and non- controversial.

We recommend that you include areas surround the Anacostia Park area and areas up river. Unless you expand the area you will get walk in goslings and they and their parents will not be able to leave before the molt.

- Lethal control, such as captive and euthanize and sharp shooters.

We do not recommend this alternative. The geese are innocent, just doing what comes naturally. They are trapped here when they have goslings. The reason they nest here is because of very bad decisions that were made many years ago concerning capturing geese for live decoys, then releasing the captive geese once the migratory flocks were decimated. To make matters worse an active program was initiated by wildlife managers to increase the numbers of these geese.

Capturing and euthanizing geese means you have to wait until they have molted. In the alternative GeesePeace management plan submitted on 8/9/07 the geese are gone at least a month before they can be rounded up. And, if you do a good job in locating the nests in the park and areas in the vicinity of the park, it is likely that the geese will go on a molt migration especially when nesting is followed by a short period of intense harassment. This means they do not come back until the Fall.

And finally, the NPS will have a public relations nightmare. And will have squandered an opportunity to get people working together to solve conflicts with wildlife that demonstrates that we care about the welfare of the wildlife and the natural places we are protecting.

Correspondence 2
Author: Martin, Michael
Organization: Sierra Club

08/10/07 FRI 14:57 FAX 2026900862
Aug 10 07 02:51p

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P. 2



Maryland Chapter

August 8, 2007

Superintendent, National Capital Parks-East
Re: Wetlands Restoration Plan/EA
1900 Anacostia Drive, S.E.
Washington, DC 20020

Dear Superintendent:

The Maryland Chapter of the Sierra Club is please to have the opportunity to comment on the Anacostia Park Wetlands Restoration Plan and Environmental Assessment with Resident Canada Goose Management Strategies. The mission statement of the Sierra club is to Explore, enjoy and protect the wild places of the earth, Practice and promote the responsible use of the earth's ecosystems and resources. Educate and enlist humanity to protect and restore the quality of the natural and human environment. And to Use all lawful means to carry out these objectives.

It has come to our attention that the Washington D. C. Chapter of the Sierra Club has recently taken a position to support the control of resident Canada geese on the Anacostia River. We understand they are having a major impact on the success of tidal wetland restoration projects.

We join the DC Chapter in calling for management actions which reduce goose herbivory on wetlands—including the use of lethal control measures. Please note the attached comments from the D.C. Chapter. The population of imported Giant Canada goose is creating problems across the State of Maryland. And we are aware that the Maryland State Highway Administration is anticipating having to ward off resident geese at its new 20-acre project, Anacostia East, just outside the District of Columbia border near Bladensburg.

The Maryland Chapter of the Sierra Club urges the National Park Service to take all necessary steps to ensure the success of constructed wetlands—for the Anacostia River, the Potomac, and the Chesapeake Bay.

Sincerely,

Michael Martin
Chair, Maryland Chapter

Cc: Jason Brochman
Damon Luciano

Correspondence 3 (Email)

Author: Feld, David

Organization: GeesePeace

Hi Stephen,

I'm attaching the GeesePeace Canada geese management plan for your consideration as you assess alternatives for the restoration of the wetlands along the Anacostia River.

Also, here are links to the molt migration studies conducted by [Cornell University for Atlantic Flyway Canada geese](#) and the [Michigan DNR for Michigan geese](#) (the links to the several sections of this study are in the right side bar).

I'm also attaching a study conducted by the USGS National Wildlife Health Center (see the highlighted area on page 11 ... this is my highlight). The conclusion is that resident Canada geese do not pose a significant risk to human health.

The attached GeesePeace plan proposes a joint effort between the US National Park Service and GeesePeace. The budget breakdown shows cost share. There is an optional research component too.

We are interested in supporting your restoration effort because it fits into the launching of our regional plan for the Washington DC metropolitan area. We began a similar program last year with the ultimate goal of implementing population stabilization (egg oiling) in areas within [60 miles of NY city](#). Our NY programs began with a [federal appropriation](#) through the USDA. Next year, we intend to have wide area programs in the Pittsburgh, PA metropolitan area too. We already have programs in the [Boston area](#) and in [Worcester, MA](#). The Worcester, MA GeesePeace program is managed by the Worcester Dept of Health. The GeesePeace program in Rockford, IL treats over 2400 eggs per year and has solved their Canada geese problems along a seven mile stretch of the Rock River, which includes a golf course, 40 soccer fields, and several miles of walking paths and riverside parkland. The Rockford program is managed by the Rockford Park District. I have a short video on their program they prepared for presentation at the GeesePeace symposium we had last year in Westchester County, NY. I can share this with you if you like.

In Oct of this year, we will have our first symposium in the UK. [Stratford Upon Avon](#) is into its third year of a GeesePeace program and they want to share their success with other communities in the UK.

So we are really excited about the possibility of working with you in our home base area.

Let me know what you think or if you need more information or have any questions.

If you agree with the proposal let's talk about next steps so that we can start mobilizing our efforts as soon as possible. Perhaps a cooperative agreement is the way to go if you decide you

want to proceed. We have had a cooperative agreement with USDA Wildlife Service for three years.

Also, the Anacostia Watershed Society may want to participate in these activities since they are strong supporters of the restoration effort. If we do proceed with this project they would be one of the key stakeholders whose opinions and participation would be very important. GeesePeace would not be involved now had it not been for them calling our attention to this project.

I'm thinking that by this time next year you will be well on your way to solving the Canada geese obstacle to wetlands restoration and will be focusing on the other aspects of the restoration program. Also, other communities who are having difficulties restoring wetlands because of over abundant geese will have model protocols to reference that will work.

I'm looking forward to hearing from you.

David Feld
National Program Director
GeesePeace
Cell 703 608 2274

*Received Geese Peace Management Plan and USGS National Wildlife Health Center Study and comments are being evaluated.

Correspondence 4 (PEPC)

Author: Brasted, Maggie

Organization: The Humane Society of the United States

August 9, 2007

Gayle Hazelwood
Superintendent
National Capital Parks-East
Re: Wetlands Restoration Plan/EA
1900 Anacostia Drive, SE
Washington, DC 20020

Dear Superintendent Hazlewood:

I am writing on behalf of The Humane Society of the United States (HSUS) and our more than 10 million members and constituents, including nearly 28,000 in the District of Columbia and more than 234,000 in Maryland. The HSUS appreciates this opportunity to comment on the scope of the Anacostia Park Wetlands Restoration Plan/Environmental Assessment with Resident Canada Goose Management Strategies (Plan/EA). The HSUS, as part of the animal welfare and protection community, has a long history of involvement with resolution of conflicts between people and wild birds and for many years has promoted community-based conflict resolution strategies founded on the strongly held belief that it is unnecessary to kill wild geese and other birds to resolve conflicts.

We applaud the efforts of the National Parks Service (NPS) and their partners to restore viable and vital wetlands to the Anacostia River system. However, we would certainly question and object to NPS lethally reducing a native animal population for the benefit of that process. The Plan/EA must present impeccable scientific demonstrations of both the need to adopt this alternative and of the fact that no other alternative would suffice. It would also have to find that the proposed action is within the policy mandate of NPS and morally justifiable. We believe these issues to be compelling enough that if NPS is to move on this issue it must engage in a fully comprehensive environmental impact assessment aimed at producing an Environmental Impact Statement (EIS). Other, specific recommendations are discussed below.

Geographic Scope of the Analysis

The Plan/EA should not limit analysis to only the sites of artificial wetlands on the Anacostia. Such a narrow geographic area will omit important aspects of the environment both impacting and impacted by the decisions this Plan/EA will be developing. Even the boundaries of Anacostia Park would be too limited. While the Plan/EA will necessarily focus on the Park, the analysis must extend to encompass the range used by the Canada goose flock who forage at the Park. Further, a reasonable and realistic assessment must be made of other processes that impede wetlands restoration, including an assessment of the adequacy of areas restored or planned for restoration to function in an ecologically sustainable manner.

Issues to Analyze in the Plan/EA

The National Environmental Policy Act (NEPA) requires analysis of impacts to all potentially effected elements of the natural and human environment. The elements of the natural environment that may be effected by the decision to be made in this Plan/EA process can be readily identified. Equally important, and equally required by NEPA, are elements of the human environment that may be impacted. In this Plan/EA these elements must include land use, long-term effectiveness of alternatives under consideration, opportunities for education and community involvement, and, of especial concern to The HSUS, ethics.

The geographic scope of the analysis is especially important in regards to land use. The Plan/EA needs to consider current and future neighboring land use because these uses play a significant role in attracting resident geese to the area around the artificial wetlands. This is particularly true at the Kingman Island site; right next to a golf course and other open grassy public areas. The Parks' goal of creating artificial wetlands, admirable as it is, is in serious conflict with the Parks' goal of providing the specific recreation opportunities that create a magnet for Canada geese next to the site selected for an artificial wetland. It is simply not realistic to have the most goose-attractive land use possible but not have abundant geese flocking to that nirvana who then also take advantage of the very attractive food source (wetlands plants) placed next door.

When considering impact on opportunities for education and community involvement, be aware of the controversy engendered when wild animals are killed merely for acting in ways that are natural to their species. Killing geese splits communities apart, engendering rancor and controversy between people. On the other hand, goose management can offer educational opportunities on natural history and the impacts of humans on ecological systems plus opportunities for community involvement in locating nests, volunteering to treat eggs, and monitoring nests and flock use of sites.

The examination of ethics must consider the humaneness of the alternatives under consideration. Additionally, the ethical issues raised by repeatedly killing wild animals to prevent them from following their natural behaviors of eating preferred plants placed where the animals will inevitably be attracted must be analyzed.

Alternatives to Analyze in the Plan/EA

Comprehensive Community-wide Goose Management Program: The Plan/EA needs to analyze the viable alternative of a comprehensive community-wide goose management program. Rather than focusing on any one or few specific tools, the Plan/EA should develop a comprehensive program with a wide variety of tools and encompassing a significant portion of the land area within the flock's range.

No one tool is a magic bullet that can solve all goose conflicts at all sites. Planners need to examine the factors attracting geese to the places where they are in conflict with human uses and then design an integrated program that uses as many tools as necessary to address those specific factors. The program must then be applied consistently with adaptive changes as experience shows what works well and as new information and tools become available.

Since geese use a much wider geographic area than the limited artificial wetlands sites on the Anacostia River, this alternative needs to be defined to include working cooperatively with state and local governments (i.e. District of Columbia, Maryland, and Prince Georges' County), other federal agencies who manage land in the region, and managers and owners of private land the geese use. This scale is necessary to effectively address this flock's impact on the Parks' wetlands.

Successful integrated programs address three main issues: recruitment, attractiveness of the site, and harassment. The alternative analyzed in the Plan/EA needs to include all of these factors. Parks has already begun to address recruitment with egg oiling and/or removal. This is an excellent first step that needs to be given sufficient time to work. Additionally, efforts to minimize recruitment need to be taken beyond the artificial wetlands to wherever the geese who forage there are nesting. In addition to egg oiling and/or removal, a new contraceptive is registered by the US Environmental Protection Agency for Canada geese. The option of including this tool in an integrated program must be analyzed.

The attractiveness of the artificial wetlands site to geese can be reduced by plant selection, if necessary with accompanying change in the elevation profile. Addressing attractiveness of the site must include the entire site as the geese see it; not just the artificial wetlands. In particular, analysis must include nearby land uses that attract and hold geese near the artificial wetlands increasing their ease of foraging on the planted vegetation.

Harassment encourages the geese to feel they are not safe from potential danger when in the areas people find them most unwelcome. Harassment with the most effective methods needs to be strongly and consistently applied. Well-trained and handled herding dogs are an excellent harassment tool. Dogs to harass away Canada geese have become commonplace on golf courses, in particular, because they are very effective although I am not aware that the golf course next to the artificial wetland site uses them. Once geese are conditioned to fear dogs, they can also be effectively used to harass geese away from open water where the dogs can be taken in boats.

The repellent methyl anthranilate, most commonly used as a taste aversion tool on plants, can also be dispersed into the air as a fog that irritates geese, causing them to leave the fogged area immediately and training them to avoid that area. It can be used over fish-bearing water, such as the Anacostia River. Similarly, the wetlands vegetation that NPS most strongly seeks to protect from goose foraging can be treated with either of the two repellents registered; methyl anthranilate or anthraquinone, when vegetation is most vulnerable to browse.

Since the integrated program must be broader than just the artificial wetlands, harassment can be coordinated so geese are not merely moved back and forth between the artificial wetlands and nearby attractive habitat such as the golf course. For example, when repellent is being fogged at the wetland site, dogs can be working the golf course.

Revisit Land Use/Engineering/Plant Mix Decisions: The Plan/EA needs to analyze an alternative of revisiting the engineering and land use decisions that created the current situation. The decisions to engineer the soil profile at a specific elevation and create a wetland with a specific

plant mix that is strongly attractive to geese next to existing land uses that are also strongly attractive to geese is not an irrevocable choice. When something proves unsuccessful due to unforeseen conditions, it is a common human response to keep upping the ante; investing more and more resources into attempts to make it successful. However, it can quickly become wasteful folly to continue investing good money, time, and effort in an effort very unlikely to ever be successful.

Some of the artificial wetlands on the Anacostia have succeeded. Parks and their partners have a right to be very proud of these successes. However, one did not succeed. It is not an appropriate response to that human failure to scapegoat the wild birds who are merely acting according to their nature. Nor will killing geese lead to success for this specific plant mix at this location; it will merely become a quagmire of controversy. Therefore, it is appropriate to analyze a fresh look at the decision to site this particular type of wetland, with this plant mix, at this particular location.

A more appropriate location for the specific type of low-elevation wetland that failed at Kingman could be sought. The problematic Kingman site could be re-engineered at a higher elevation with a different plant mix less attractive to geese and more resilient when browsed. As with the comprehensive community-wide goose management alternative, this alternative should be as geographically broad as possible.

The HSUS urges Parks to review these issues, alternatives, and concerns in the Plan/EA and base your decision on the best available science as well as the realities of the region's environment, both natural and human. Thank you for the opportunity to make these comments on the scope of the Anacostia Park Wetlands Restoration Plan/Environmental Assessment with Resident Canada Goose Management Strategies.

Sincerely,

Maggie Brasted
Director
Urban Wildlife Conflict Resolution
The Humane Society of the United States
2100 L St. NW
Washington, DC 20037
301/548-7753 voice
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Correspondence 5

Author: Wolf, Richard N.

Organization: Capitol Hill Restoration Society

08/01/07 TUE 14:29 FAX 2026900862

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CAPITOL HILL RESTORATION SOCIETY

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August 6, 2007

Superintendent
National Capital Parks East
1900 Anacostia Avenue, S.E.
Washington, D.C. 20020

Re: Wetlands Restoration Plan E/A Testimony

Testimony of the Capitol Hill Restoration Society to National Park Service's Public Scoping Meetings Anacostia Park Wetlands Restoration Plan/ Environmental Assessment with Resident Canada Goose Management Strategies

July 18, 2007

The Capitol Hill Restoration Society (CHRS) is a community organization of some 1,000 members. For more than 50 years CHRS has worked to promote and protect all aspects of the well-being of greater Capitol Hill, including the environment. Improving the water quality and natural environment of the Anacostia River are important goals for our members.

CHRS supports all six factors listed as contributing to the success of wetland restoration efforts in Anacostia Park. We wish to comment specifically on these factors: Resident Canada Goose Management, Wetland Vegetation, and Invasives and Exotic Plants.

Resident Canada Goose Management

Kingman Marsh and Heritage Marsh on the Anacostia River are the largest tidal wetlands in the District of Columbia. The health of these marshes is vital to water quality and habitat of many fish and bird species. To restore the marshes, \$6 million was invested to pump in mud and grow aquatic plants. We understand that the plants are growing well. But resident Canada geese are devouring the plants faster than they grow. There is every indication that because they are present in such large numbers, the geese will continue to literally consume the wetlands. On July 10, 2007, 779 resident Canada geese were counted in the Anacostia River area (a record high population, despite killing geese eggs for the last three years).

The situation is urgent. For this reason, CHRS strongly urges that, as soon as possible, the National Park Service complete the public scoping process, weigh competing interests and decide how best to protect these wetlands from damage.

CHRS Wetlands Restoration Plan Testimony of July 18, 2007
Page 2
August 6, 2007

Wetland Vegetation

CHRS strongly supports any effective methods to restore wetlands vegetation. CHRS encouraged its members recently helped to plant arrow arum plants at Kingman Island.

Invasives and Exotic Plants

CHRS urges NPS to map and survey the Anacostia Park wetland areas, and then take action to eliminate invasive trees, plants, and vines. A quick survey indicates that invasives are a problem on the west bank of the Anacostia River. Near RFK Stadium, Reservation 13 (DC General campus), and Barney Circle the following invasives are present as of July 2007: Ailanthus, Chinese privet, Japanese knotweed, and porcelain berry.

Thank you for the opportunity to submit this testimony.

Sincerely,



Richard N. Wolf
President

cc: by email to <http://parkplanning.nps.gov/anac>

Correspondence 6
Author: Stone, Nancy
Organization: Natural Resources Defense Council

08/01/07 WED 08:22 FAX 2026900862

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NATURAL RESOURCES DEFENSE COUNCIL

July 24, 2007

Gayle Hazelwood, Superintendent
National Capital Parks-East
1900 Anacostia Drive, SE
Washington, DC 20020

RE: Wetlands Restoration Plan/EA

Dear Superintendent Hazelwood:

The Natural Resources Defense Council is a national environmental organization. However, for many years we have had a special project to improve the health of the Anacostia River. Currently, we are working on several fronts, including to implement the goal of a Trash Free River by 2013, to support an enhanced stormwater utility fee in the District of Columbia, to develop implementing regulations for the new stormwater law in Maryland, and to strengthen the storm water controls regulations in Montgomery County, where much of the Anacostia headwaters are located.

As you probably know, nonmigratory Canada geese are having a deleterious effect on the tidal wetland restoration projects on the river in the District of Columbia. Since these birds are not members of the original Anacostia faunal community and because they are having a large, negative impact on the nutrient processing and filtering capacity of the constructed wetlands, which were built at significant public expense, NRDC requests that you take appropriate management action. In particular, we ask you to develop a multi-faceted geese population control and wetlands protection and restoration plan. Current approaches are not adequate to control the burgeoning geese population along the river. We urge you to continue to ramp up this program with additional resources and measures until the geese population is under control and the wetlands are protected.

Thanks very much for your work on this important aspect of restoring the Anacostia River.

Sincerely,

Nancy Stone
Director, Clean Water Project

www.nrdc.org

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Correspondence 7

Author: Jensen Miles, Karen

Organization: Alice Ferguson Foundations, Inc.

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ALICE FERGUSON FOUNDATION, INC.
ENVIRONMENTAL EDUCATION ON THE POTOMAC

July 17, 2007

Gayle Hazelwood, Superintendent
National Capital Parks - East
1900 Anacostia Drive, SE
Washington, D.C. 20020

Dear Superintendent Hazelwood:

This letter is intended to voice my support for Canada goose management in national parks in the Washington Metropolitan area. This problem is not restricted to NPS-owned properties along the Anacostia River, but also along the Potomac River at Piscataway Park.

The Alice Ferguson Foundation/Hard Bargain Farm Environmental Center conducts agricultural operations within Piscataway Park under a special-use agreement with the National Park Service. For decades, our farmers have practiced successful crop rotation with a wide variety of plants that included soybeans, corn, wheat, rye, lespedeza, timothy and clover. Over the past 10-15 years, our ability to harvest these crops has been drastically reduced and in the past 5 years, we are only able to grow mediocre quality hay - no other crops.

The Canada geese are present in Piscataway Park in great numbers in the spring when seeds germinate and send up green shoots. Geese descend *en masse* and obliterate nearly every seed that sprouts.

In addition to agricultural damage at Piscataway Park, we have seen a species shift in the marsh at the mouth of Accokeek Creek. Wild rice was once the dominant plant there. Now, we are lucky to have a total of 10 plants in the entire marsh. Replanting, as has been suggested, is out of the question until the goose population is drastically reduced.

It wouldn't be prudent to wait for the goose population to naturally decline. Wildlife management biologists have been waiting for that to occur for over a decade.

Sincerely yours,

Karen Jensen Miles
Program Director

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Correspondence 8 (Email)

Author: Hammerschlag, Dick

Organization: USGS Patuxent Wildlife Research Center



United States Department of the Interior

USGS Patuxent Wildlife Research Center-Beltsville Lab
c/o BARC East, Building 308
10300 Baltimore Avenue
Beltsville, Maryland 20705

July 30, 2007

Superintendent, National Capital Parks – East
RE: Wetlands Restoration Plan/EA
1900 Anacostia Drive, S.E.
Washington, D.C. 20020

RE: Wetlands Restoration Plan/EA

Dear Superintendent Gayle Hazelwood:

There were obviously some very good reasons for directing the NPS EA/Plan at wetland restoration as opposed to simply focusing on the resident Canada goose trauma. Inherent with that approach come additional responsibilities and commitment. Following are a few points keyed to this direct positive role for NPS to be playing in the Anacostia wetlands.

1. To date the National Park Service has been a willing and encouraging receptor to the marsh restoration efforts in the Anacostia but has put very little on the table beyond the expertise and time of its staff. That posture will need to change to more direct intervention in the form of planning, securing funds, committing personnel and taking actions to restore and manage the existing wetlands assuming that many aspects of the Plan/EA are approved/endorsed.
2. Considerable acreage at Kingman Marsh need rebuilding which will require varying degrees of replanting, planting protection from remnant geese and possibly addition of sediment to attain elevations suitable to support emergent vegetation.
3. The sheet piling at the Fringe Marsh needs to be dealt with and the old deteriorated exclusion fencing needs to be removed from the Kingman and the Fringe Marsh as well as ultimately from Heritage Marsh.

4. Importantly, a short and long term Wetland Monitoring Plan sustained by the NPS needs to be drawn up and implemented that includes all the NPS freshwater tidal marshes in the Anacostia (Kenilworth, Kingman, Fringe and Heritage).

5. Yes, the current disposition for the wetland restoration is to deal with the existing status especially as set back by the presence of the over abundant resident Canada geese. However, consistent with the posture of restoring/sustaining the existing wetlands must also come direct support for re-establishing additional wetlands. This is vital and justified because to restore the existing wetlands there is the need for their well being to be interconnected. Thus the existing disparate pieces need to be at least connected if not supplemented with additional wetlands so that the Anacostia wetland complex can function as an integrated whole. The capacity for the Anacostia wetlands to serve as sufficient habitat will require the formation of a collectively functioning critical mass of diverse ecotypes, such that simply resurrecting the existing pieces is not the whole answer for restoring the Anacostia wetlands - not even sufficient for each of the wetland sites themselves.

Sincerely,

Dr. Dick Hammerschlag
Biologist
USGS Patuxent Wildlife Research Center

Correspondence 9 (PEPC)
Author: Brown, Laura S.
Organization: Save the Geese
PEPC Entry

It would be completely unnecessary to use lethal methods in reducing the population of Canada geese. This will also result in a divided community - something nobody wants. Instead I suggest a win-win-win option. Utilizing the GeesePeace method encompasses egg oiling, hazing with border collies and simple maintenance. A plan is provided by GeesePeace after visiting your area free of charge.

Border Collie services provided by Mary Liebau of Coast is Clear will quickly eradicate the problem without killing. This is a win for the town, a win for park users, and a win for the geese! There are many areas they can go without bothering anyone.

We know a little something about this. In 2006 Scotia, NY faced the same problem. A very ugly battle ensued, and the community was divided. A group of used proved most effective in demonstrating how non-lethal methods work.

I urge you to visit us at www.savethegeese.com. When you can use non-lethal measures, why wouldn't you?

Thank you
Laura Brown, spokesperson
Save The Geese

Correspondence 10 (PEPC)
Author: Shane, Edward B.
Organization: Anacostia Watershed Corporation

July 27, 2007

Gayle Hazelwood, Superintendent
National Park Service
National Capital Parks-East
1900 Anacostia Drive, SE
Washington, DC 20020

RE: Wetlands Restoration Plan/EA

Dear Ms. Hazelwood:

On behalf of the Anacostia Waterfront Corporation, and the many stakeholders who have actively followed the issue of Canada goose impacts in Anacostia Park, I want to thank you and your staff for convening the recent scoping meetings and moving the wetlands restoration plan and environmental assessment process forward.

Many important points were highlighted at the scoping meetings. Our primary comment is that NPS must take responsibility to use a full range of alternatives, including lethal methods, to control the burgeoning population of resident Canadian geese on NPS property along the shore and in the tidal waters of the Anacostia. There are many justifications for such measures to reduce populations. Of particular concern to AWC and the District is the need to reduce or eliminate negative water quality impacts caused by the geese. These include, but are certainly not limited to: 1) overgrazing of wetland vegetation at restoration projects in Kingman Lake and at other locations resulting in increased erosion and loss of vegetation and habitat; and 2) an influx of nutrients, bacteria and pathogens that harm the tidal estuary ecosystem and raise potential human health concerns.

From AWC's perspective, we are also concerned that failure to address the negative impacts of geese will undercut the ability of river advocates to obtain financial and political support for additional local and federal appropriations to expand wetland restoration efforts. Until we can demonstrate that we are able to adequately protect the multi-million dollars wetland investments already made, it may be difficult to secure funding to expand future efforts.

Therefore, we strongly encourage NPS to define a management approach for resident Canadian geese that is effective and proceed to implement the plan as quickly as possible.

Finally, while the moderator of the scoping meeting made clear that this planning/EA activity is focused on preserving the wetland resources that have already been restored, we strongly encourage NPS to consider including discussion of opportunities for additional restoration along the Anacostia, such as identifying locations for future restoration opportunities, and to use this process to think broadly and creatively about next steps on NPS property to promote wetland and

river restoration efforts.

AWC thanks you for your continuing dedication to the Anacostia River and for the opportunity to comment. We look forward to the results of your analysis.

Sincerely,

Edward Brendan Shane
Director, Environmental Programs and Policy

Correspondence 11

Author: McKindley – Ward, Steve

Organization: Anacostia Watershed Society



Anacostia Watershed Society

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July 18, 2007

Superintendent, National Capital Parks-East
Re: Wetland Restoration Plan/EA
1900 Anacostia Drive, SE
Washington DC, 20020

Dear Supintendent Hazelwood:

For the record, AWS is re-submitting our letter to you of August, 25 2006 (attached). We are also submitting a document we wrote (*The Anacostia Goose Situation: Questions and Answers*) that we've been circulating in recent months. In combination, these two pieces sum up our position on the ongoing wetland damage caused by overabundant resident geese---and what is and isn't, in our opinion, a likely way forward to reduce wetland damage.

We are also submitting for the record eight letters addressed to you from other environmental and civic organizations---all sent in recent months, all on the same topic. (These are sent to make sure the sentiments expressed are included in the official record.)

In addition, we are enclosing an article from the March 2007 *Journal of Wildlife Management* entitled "Herbivory by Resident Geese: The Loss and Recovery of Wild Rice Along the Tidal Patuxent River" by Haramis and Kearns. This article contributes to the body of evidence that the grazing patterns of nonmigratory geese are a setback to the ecological functioning of local freshwater tidal marshes.

It is the position of AWS that no tool should be left out of the NPS "toolbag" to manage the Anacostia goose population.

After all aversion/harassment techniques are given due consideration, and if those management measures are found not feasible, AWS recommends that resident geese in Anacostia Park be turned into food. The experience of the Twin Cities may be helpful in this regard. Enclosed are a few documents (now dated---from the mid 1990's) which shows that Minnesota first... 1.) tested Mississippi River geese for toxics; 2.) conducted research to determine whether there was a public interested in eating goose meat, and 3.) worked to develop a distribution system---and determined how much the whole thing would cost. They eventually developed a "food pantry" system for distributing free meat. In the opinion of AWS, the general public around Washington will be much more amenable to the action of harvesting resident geese if positive use is made of untainted, edible (USDA-approved?) goose meat.

It is our opinion that all management measures have drawbacks: Nonlethal measures have drawbacks of effectiveness and cost. Aversion techniques, if successful, will likely end up sending the problem to some other part of the river or some other place where geese in large numbers are not wanted. On the other hand, lethal measures have the drawback of being distasteful to some members of the public and anathema to the animal rights community. But to this we can say the following:

1. Existing wetland goals---Wetlands matter. There are both Chesapeake Bay and Anacostia watershed goals for re-establishing wetlands. Geese, particularly at Kingman Marsh, are a constant setback to DC's largest tidal wetland, which is two-thirds devegetated and dependent upon wire fencing to prevent further losses---wire fencing that also prevents the use of these emergent vegetated areas by other wildlife.
2. Water quality---AWS's goal is a fishable, swimmable river. Overabundant geese contribute hefty amounts of fecal coliform bacteria, likely more than any other wildlife source. That same waste exacerbates an already-bad nutrient pollution problem.
3. Flora and fauna diversity---Geese mow down all plants in the constructed wetlands except mature Spatterdock (*Nuphar advena*) and mature Arrow arum (*Peltandra virginica*). This leaves a marsh poor in plant diversity, as well documented in Dr. Richard Hammerschlag's research.
4. DC's Species of Greatest Conservation Need---We don't really know whether the Virginia rail, American bittern, or Sora will show up at Kingman Marsh if the habitat were to fully develop. But we do know that large numbers of geese are not helping those chances. Since there is a priority in DC on conservation of rails and bitterns, i.e. DC's list of "species in greatest conservation need," doesn't that say something on how these marshes should be managed? The Marsh wren---long absent from the tidal river---came back after the completion of Kenilworth Marsh in the 1990's.
5. The Future of Spatterdock and Arrow arum at Kingman---These two marsh stalwarts are often thought as "goose proof" perennials. However, AWS carries some concern about even these two survivors. Why? Because we see essentially no seedlings survive outside fenced mudflat. We have been on the lookout for these seedlings in the open marsh at Kingman for the last four years. They appear briefly in the Spring, then disappear. At the same time, during the Winter, root grazers (presumably beaver and muskrat) are making slow inroads on the stands of mature *Peltandra* and *Nuphar*. If no new seedlings are able to establish, and winter grazers knock back the *Peltandra* and *Nuphar* stands winter after winter (not dramatically, but noticeably), is that a good forecast for the long-term viability of these marsh plants? Further, in our opinion, there should be a qualifier

on use of the term "unpalatable to geese." It is our opinion that this applies only to *Peltandra* and *Nuphar* in their mature form. Young plants get gobbled with everything else.

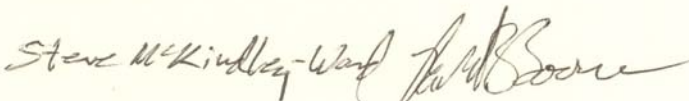
6. Fencing is not sustainable---Fencing is not a viable, long-term solution to goose herbivory because it blocks other fauna from food, cover, and nesting sites. It also requires ongoing maintenance (labor intensive), and is has aesthetic drawbacks in a natural area. Add to this AWS's observation---particularly evident in late June and early July this year---that flightless geese are getting stuck inside exclosures during the feather molt. We observed and photographed approximately 80 geese in 10 different fenced cells unable to get back out (see attached photos). The birds had eaten everything. In one case, three out of 12 were dead and the remaining nine had beaten a trail 5 inches deep in the mud on the inside perimeter of the cell walking back and forth, back and forth, looking for a way out. It was pathetic. In each case, AWS staff opened the fencing and let the geese escape. Remaining a mystery is how these flightless geese got into the closed cells in the first place. We have also discovered 5-6 Snapping and Eastern Painted turtles somehow trapped inside fenced cells this Spring. Same story. We don't know how they get in, and, of course, help them back out. Fencing is thus not only unsustainable and undesirable---it is somewhat of a hazard.
7. The Department of Natural Resources in Maryland has a goal to reduce its resident goose population to 30,000. The Spring 2007 estimate for resident geese, according to Larry Hindman, director of DNR's Waterfowl Project, is 85,160. NPS, of course, has no obligation to harmonize with broader, regional management goals. But the fact that Maryland wants to reduce resident geese by two-thirds might have some bearing on NPS decisionmaking.
8. Egg oiling, though important to continue, does not hold out promise of reduced grazing pressure anytime soon. The Canada Goose Committee of the Atlantic Flyway Council says: "To effectively reduce resident goose populations, an increase in adult and immature mortality rates, combined with reproductive control, is necessary. Reproductive control (e.g., egg treatment or sterilization) alone cannot reduce the population in an acceptable time; treatment of 95% of all eggs each year would result in only a 25% reduction over 10 years." (Canada Goose Committee, Atlantic Flyway Council. (1999) *Atlantic Flyway Resident Canada Goose Management Plan*, unpublished document.) Despite the Resident Goose Management Committee's best efforts at egg oiling on the tidal Anacostia the last four Springs, some goslings hatch each year and survive---this year, 14 at Langston/Kingman and six at Kenilworth Aquatic Gardens (These numbers, when combined with James Hemsley's data on number of eggs oiled in those two sectors, can produce a "percent oiled" figure---which might be of use in determining if we are reaching even the 95% threshold.
9. Last week, on July 10, the Resident Goose Management Committee and volunteers conducted our 13th goose count over the last four years. We enumerated a record

number of geese on the tidal corridor (783), and the largest-ever number in Kingman Marsh (640). The number at Kingman raised eyebrows. Could it be that Kingman Marsh is increasingly being considered a safe place to ride out the annual feather molt, when flightless geese feel particularly vulnerable? Numbers on the attached spreadsheet show that resident geese consistently congregate in higher numbers at Kingman/Langston during our July "mid-molt" counts. The spreadsheet also shows that 42% of all the geese sighted during the 13 counts have been sighted at Kingman/Langston.

10. AWS is not in favor of getting rid of every last goose in Anacostia Park. Instead, we are in favor of finding a reduced population which will allow a wider diversity of emergent marsh plants to survive, which in turn should support a wider faunal community. Determining the appropriate number is not straightforward at this time, and adaptive management and monitoring will almost certainly be necessary. It may take a few years to figure out a sustainable resident goose level for Kingman and Heritage Marsh.
11. Currently, resident geese are limiting habitat for a larger suite of wildlife. They they limit diversity. Adult geese have no real predators to keep the population in check---and humans need to take over that role. AWS believes it is our job to identify the number of geese that can be supported along the Anacostia corridor without major habitat impacts and also stay within tolerances for accumulated feces on the golf course and other recreational parkland.

AWS stands ready to assist the National Park Service in the resource conservation part of their mission in Anacostia Park.

Yours Sincerely,



Steve McKindley-Ward

Robert Boone

Enclosures

**** Attachments sent by Steve McKindley-Ward: Letters are below and article attachments were reviewed ****



Anacostia Watershed Society

(301) 699-6204 Fax (301) 699-3317

Email: robert@anacostiaws.org

<http://www.anacostiaws.org>



August 25, 2006

Gayle Hazelwood
Superintendent, National Capital Parks East
National Park Service
1900 Anacostia Drive SE
Washington, DC 20020

Gayle
Dear Gayle:

Wetlands matter. And Washington DC's largest tidal wetland---Kingman and Heritage Marsh on the Anacostia River---remain in big trouble due to overabundant nonmigratory (resident) Canada geese. As the land manager and a federal agency charged with a conservation mission, it is incumbent upon the National Park Service to take action to preserve ecological balance.

As you know, progress toward completing the NPS's Environmental Assessment on resident goose impacts in Anacostia Park has ground to a halt. Last year, NPS staff person Susan Rudy was leading the work to make the document compatible with NPS policies and standards. By all accounts, Susan was an exemplary professional and a credit to NPS/National Capital Parks-East. However, for reasons we can only speculate about, she was unable to make any progress toward finishing the goose Environmental Assessment between November 2005 (when AWS and others on the Resident Goose Management Committee reviewed a draft) and her departure to California in May 2006---six months with no progress. During this time, our Committee assumed progress was being made. Learning there was no progress was greatly disappointing news this Spring.

As a river advocacy organization, we urge the NPS to pick up and finish the EA process and decide how best to confront the ecological damage caused by resident Canada geese. The 45-acres of tidal wetland at Kingman and Heritage Marshes, which were off to an impressive start in 2000, now look like a moth-eaten garment or Swiss cheese---with more holes than cheese---due to overgrazing by resident geese (see aerial photos). USGS's Dr. Dick Hammerschlag has documented that over 60% of the \$6 million Kingman Marsh restoration project has been devegetated by resident goose herbivory. And if winter ice and summer storms act to tear down anti-goose fencing in the same way it has done in the past, the new 5-acre restoration at Heritage Marsh will soon look the same way.

It would be one thing if these nonmigratory geese were a native population. But they are not. They are, as you know, an imported subspecies from the Upper Midwest, *Branta canadensis maxima*, now the cause of complaints across the country. But on the Anacostia it is worse. Not only is there goose feces underfoot throughout Anacostia

Park, there is significant ecological damage to the river, i.e. the loss of over 25 acres of freshwater tidal wetland at Kingman and Heritage. The Anacostia River can ill afford this loss, and the fate of the 45-acre Kingman and Heritage marsh complex---a giant water-cleaning organ, nutrient processor, excellent wildlife habitat, and dazzling green aesthetic amenity---hangs in the balance.

Also hanging in the balance is the possibility of future funding from the Army Corps of Engineers, who rightly see an ongoing inability to manage geese as a reason to think twice about further investment in wetland restoration in DC (see May 19, 2006 quote by the Army Corps' Steve Pugh in the Washington City Paper's feature "Honk if You Are Destroying an Ecosystem: Canada Geese are Devouring the Anacostia's Precious Marshland"). Here it is worth noting that 75% of the funding for Kenilworth Marsh (1993), Kingman Marsh (2000), and River Fringe Marsh (2003)---a total of 110 acres at a cost of \$16 million---has come from the Corps. Why invest more money if most of it becomes goose poop? Goose poop, by the way, from 600 geese (our counts show) that adds to the Anacostia's nutrient pollution problem.

Our organization has more than a passing interest in the resident goose problem. Our staff has invested four years of work on the mudflats to fill in holes in the "Swiss cheese" at Kingman and Heritage Marsh. We have figured out how to propagate native wetland plants from seed. We have led 48 field trips with DC and Maryland students and community groups since 2002 to transplant those plants, doing wetland education on each trip. We have transplanted approximately 7,300 perennial plants inside 18,000 linear feet of anti-goose fencing---fencing we bought and erected with volunteers---and which we continue to maintain. At this writing, Wild rice seed panicles wave 9-10 feet in the air over approximately 12 acres in Kingman and River Fringe marshes. That was AWS's work. AWS has also been a mainstay in the Resident Goose Management Committee's egg oiling program over the last three Springs, and we have led the ongoing resident goose count effort since April 2004 (nine counts to date, which average around 600 geese on the tidal river). We thus have an investment in the success of Kingman and Heritage Marsh.

We are not the only ones. In the past 13 years, the DC government provided the 25% local cost-share for marsh restoration.

And now the Anacostia Waterfront Corporation is contracting to build a new state-of-the-art nature center on Kingman Island. When that center is built, will it reflect well on the NPS/Anacostia Park staff if this new nature center is located adjacent a devastated, "Swiss-cheese" marsh? A marsh that only limps along, more mudflat than vegetation, with extremely low plant diversity? A marsh that is surrounded by fence to keep the geese off, but which unfortunately also excludes Muskrat, Beaver, Grey fox, turtles, and large fish? Because truth be told, marsh interpretation will correctly point toward the NPS as the responsible land manager.

Your staff is well aware of the negative ecological impacts of resident geese and how the fencing program is not the solution. As land managers with a mandate to protect

natural resources, we urge you to finish the Environmental Assessment process. This is only reasonable. It does not commit the NPS to any particular management measure. It simply finishes the NEPA process you've already started and lets the public express its views on the question of how best to manage an overpopulation of resident geese.

One final thing regarding the geographic scope of the Environmental Assessment...

Some recent discussion among members of the Resident Goose Management Committee has raised an interesting idea: Confine the geographic scope of the EA down from the whole of Anacostia Park to just the reconstructed wetlands and immediate environs. Why? This is where the serious goose damage is being done. It is also where we enumerate a disproportionate amount of the tidal river's resident geese. In our counts over the last 3 years, 38 percent of the total geese enumerated have been at Kingman Marsh. If you add Heritage Marsh, it becomes 55% of the overall total. Goose management may become more do-able if it is pinpointed geographically. By shrinking the EA to the reconstructed marshes and environs---the worst hit spots---some of the more controversial aspects of goose management can be avoided because management measures there can be strongly defended. Then, if the management measures prove successful, they can be used as a precedent for a larger area.

AWS is a citizens organization committed to doing anything we can to improve the health of the Anacostia River. We know you share that goal, and look forward to meeting with you on August 29.

Sincerely,



Robert E. Boone
President

cc:

Joe Lawler, NPS
Jim Sherald, NPS
Sue Bennett, NPS
Steve Syphax, NPS
Steve Pugh, COE
Claire O'Neill, COE
Chris Wagon, Prince George's M-NCPPC
Dr. Dick Hammerschlag, USGS
Adrian Washington, Anacostia Waterfront Corporation
Uwe Brandes, Anacostia Waterfront Corporation
Jimmy Garvin, Langston Golf Course
Elizabeth Berry, DC DOE
Hamid Karimi, DC DOE

Peter Hill, DC DOE
Jon Siemien, DC DOE
Jim Dougherty, Sierra Club
Maureen Harvey, Maryland Ornithological Society
Brian Van Wye, ECC
Ben Grumbles, EPA
John Capacasa, EPA
Dan Smith, AWMC CAC
Tom Arrasmith AWMC CAC
John Galli, AWMC
Dr. Judy Fisher
Larry Hindman, MD DNR
Doug Siglin, CBF
Keith Bowers, Biohabitats, Inc.



WASHINGTON D.C. CHAPTER

September 22, 2006

Gayle Hazelwood
Superintendent, National Capital Parks East
National Park Service
1900 Anacostia Drive SE
Washington, DC 20020

Please Reply To:
James B. Dougherty
Legal Chair
709 3rd St. SW
Washington D.C. 20024
202/488-1140 (voice)
202/484-1789 (fax)
JimDougherty@aol.com

Dear Ms. Hazelwood:

I'm writing about the NPS's Environmental Assessment on resident goose impacts in Anacostia Park. Protecting the ecosystem in the vicinity of Kingman and Heritage Islands has been a priority of the Sierra Club since 1985. We have greatly admired and appreciated the work of the Park Service and the Corps of Engineers in attempting to restore vegetated wetlands in and around the islands.

Unfortunately, this valuable effort seems to be in jeopardy due to overgrazing by resident geese. The appearance of this exotic species is relatively new and unwelcome (I assume you saw the feature article in the May 19, 2006 issue of the Washington CityPaper – "Honk if You Are Destroying an Ecosystem: Canada Geese are Devouring the Anacostia's Precious Marshland"). The birds are not only consuming large quantities of vegetation – they are depositing a considerable load of feces that becomes another source of excess nutrient pollution.

Apparently, the NPS's nascent goose control effort – and the associated Environmental Assessment – have been stalled. The Sierra Club requests that you get both projects back on track.

Sincerely,

Jim Dougherty
D.C. Chapter
Sierra Club

cc: J. Lawler, NPS



ANACOSTIA WATERSHED CITIZENS ADVISORY COMMITTEE

Dedicated to the protection and restoration of the Anacostia River and its tributaries

September 7, 2006

Superintendent Gayle L. Hazelwood
National Capital Parks - East
1900 Anacostia Drive S.E.
Washington, D.C., 20020



Dear Superintendent Hazelwood;

The Anacostia Watershed Citizens Advisory Committee shares with you, and with other members of the Anacostia watershed community, the determination that a thoughtful and effective goose management plan be agreed to and implemented as soon as possible. The predation of six hundred imported nonmigratory geese is relentlessly destroying native vegetation and the general quality of wildlife habitat in the Anacostia, upsetting the natural operation of the river. We believe that once the goose population is brought under control a combination of natural processes coupled with modest stewardship will see the wetlands restored, a return of native plants and wildlife, and the start of the emergence of a clean and healthy river.

It is for these reasons that we request that the Environmental Assessment of the nonmigratory goose problem in the Anacostia be completed and released as soon as possible. The sooner we get public education and debate on the goose management options the sooner we can come to grips with this difficult problem and the sooner the river can be restored. The Anacostia Watershed Citizens Advisory Committee stands ready to work with you and other government and nongovernment watershed restoration partners to facilitate public discussion and decision making.

We value the constructive partnership we have with the National Park Service on watershed restoration issues. We see the goose management problem as an opportunity to continue to work together for the public good. Releasing the Environmental Assessment will help us all get this project underway.

Thank You,


Dan Smith, AWCAC Chair Tom Arrasmith, Vice Chair
Prince George's County Washington, DC

CC: Mr. Adrian Washington
Ms. Elizabeth Berry
The Honorable Carol Schwartz

c/o Metropolitan Washington Council of Governments
777 North Capitol Street, NE, Suite 300
Washington DC 20002-4329

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NATURAL RESOURCES DEFENSE COUNCIL

September 29, 2006

Gayle Hazelwood, Superintendent
NPS National Capital Parks-East
1900 Anacostia Drive SE
Washington, DC 20020

Dear Ms. Hazelwood:

The Natural Resources Defense Council is a national environmental organization. However, for many years we have had a special project to improve the health of the Anacostia River. Currently, we are working on several fronts, including to implement the goal of a Trash Free River by 2013, to set new green development standards for the Anacostia Waterfront Corporation, and with a clean water coalition to strengthen the storm water controls regulations in Montgomery County, where much of the Anacostia headwaters are located.

As you probably know, nonmigratory Canada geese are having a deleterious effect on the tidal wetland restoration projects on the river in the District of Columbia. Since these birds are not members of the original Anacostia faunal community, and because they are having a large, negative impact on the nutrient processing and filtering capacity of the constructed wetlands, which were built at significant public expense, NRDC requests that you take appropriate management action. In particular, we ask you to develop a multi-faceted geese population control and wetlands protection and restoration plan.

We further understand that work on an Environmental Assessment on the goose problem was halted last year. It makes sense to restart that process as soon as possible. Thanks very much for your work on this important aspect of restoring the Anacostia River.

Sincerely,

Nancy Stoner
Director, Clean Water Project

cc: Joe Lawler [National Park Service, 1100 Ohio Drive SW, Wash DC 20242]
Robert Boone

www.nrdc.org

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Washington, DC 20005
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ANTHONY A. WILLIAMS
MAYOR

November 14, 2006

Superintendent Gayle L. Hazelwood
National Capital Parks - East
1900 Anacostia Drive S.E.
Washington, D.C., 20020

RE: Request to Release Environmental Assessment on Resident Canada Geese

Dear Superintendent Hazelwood:

Over the past six years, the District has partnered with the US Army Corps of Engineers (USACE) and the National Park Service (NPS) on three tidal wetland restoration projects in the Anacostia River and Kingman Lake. These projects are a significant part of the overall effort to clean up the Anacostia and bring back native wildlife to this important river. Over 65 acres have been created through this partnership, a level of activity that, on a per-acre basis, is greater than anywhere else in the United States. The District has committed over \$2 million and the Corps of Engineers over \$8 million to these projects in order to bring improvements in wildlife habitat, water quality, and recreational enjoyment.

Despite the efforts of many, the presence of large numbers of resident Canada geese has dramatically affected one of the wetland projects and threatens to negatively affect the other two. Nearly 65% of the 40-acre Kingman Lake project has been destroyed by the overzealous grazing by these non-native species that congregate on the numerous turf lawns of Anacostia Park. What vegetation remains is composed of only one or two species. Where geese are excluded, over 65 plant species have been identified, including Wild Rice (*Zizania Aquatica*), a species that proliferated along the Anacostia prior to development of our modern city. Plants such as wild rice create the habitat for important species such as the Sora Rail (*Ortygometra Carolinus*), a species that could thrive in the Anacostia if resident geese were managed and the wetlands were allowed to thrive. Through active monitoring and evaluation, it is clear that the presence of large numbers of non-native resident Canada geese is the primary impediment to restoring wetlands in the Anacostia.

Beginning early in 2003, the District has worked with NPS to develop a management plan and environmental assessment for this non-native species. While initial efforts were made towards

Superintendent Gayle L. Hazelwood
October 13, 2006
Page 2:

developing these documents, as of today it appears that little progress has been made by the NPS staff assigned to this project.

I ask you to direct all necessary resources and staff towards addressing this issue, which currently threatens the success of important restoration efforts in the Anacostia. Given that the resident Canada geese reside on NPS lands, NPS has the authority and responsibility to research and develop the appropriate NEPA documents. The sooner that public education and debate can begin on goose management options, the sooner we can address this difficult problem and the river restored. The District of Columbia stands ready to work with you and other government and non-government watershed restoration partners to facilitate public discussion and decision-making.

We value the constructive partnership we have with the National Park Service on watershed restoration issues, and consider the resident Canada goose problem as an opportunity to continue to work together for the public good. Releasing the Environmental Assessment will help us all to get this project underway.

Sincerely,



Anthony A. Williams
Mayor

cc: Jim Connaughton, Council on Environmental Quality
Elizabeth Berry, District Department of the Environment
District of Columbia Councilmembers
Robert Boone, Anacostia Watershed Society
Bob Nixon, Earth Conservation Corps
Dan Smith, Anacostia Watershed Citizens Advisory Committee

MARYLAND ORNITHOLOGICAL SOCIETY, INC.



Reply to: Maureen Harvey, Conservation Chair
Maryland Ornithological Society
302 Chelsea Court
Sykesville, MD 21784-7717

September 27, 2006

Gayle Hazelwood
Superintendent, National Capital Parks East
National Park Service
1900 Anacostia Drive, SE
Washington, DC 20020

Dear Ms. Hazelwood:

The Maryland Ornithological Society would like to express our concerns about the National Park Service's Environmental Assessment on resident Canada goose impacts in Anacostia Park. While we have greatly admired and appreciated the work of the NPS and the U.S. Army Corps of Engineers (USACE) in attempting to restore the fresh water wetlands in Kingman Marsh and around Heritage Island, we believe that this valuable effort is in serious jeopardy due to depredations by resident Canada geese.

The Maryland Ornithological Society is a non-profit society of approximately 2,000 members who support the conservation of birds and bird habitat. MOS members qualified in ornithology, wildlife biology, resource conservation, and ecosystem management contribute their professional expertise as volunteers by reviewing documents and drafting comments on behalf of the Society. Members of the Maryland Ornithological Society visit federal public lands and national parks across the country because they contain important habitat for birds and other wildlife. Our members proudly support conservation and stewardship of public lands all across the United States. We believe we have the right and the responsibility to participate in decision-making by our federal agencies about the conservation of natural resources and future management of these lands.

We find the conclusions drawn by the U.S. Geological Survey's Patuxent Wildlife Research Center and the University of Maryland Department of Biological Resources Engineering, who authored "Five Years of Monitoring Reconstructed Tidal Freshwater Wetlands in the Urban Anacostia River (2000-2004)", to be an objective analysis of the true conditions that now occur in and around these wetlands. They observed that resident Canada geese have denuded Kingman Marsh Areas 1 and 2, resulting in a cycle of erosion, land subsidence, and reduced seed germination, followed by additional erosion. Control measures to protect the substantial federal investment in this landmark restoration project to date have been negligently inadequate. Also, an assessment and plan of action from the NPS that has been anticipated for months is long overdue.

This situation is compounded by the lack of effective action from the federal agencies responsible for protecting these threatened natural resources and the substantial federal investment in restoration of these wetlands. We would like a specific reply to our concerns, and written notification of a date certain for the completion of an up-to-date Environmental Assessment and implementation of a resident Canada goose control project. Our members, many of whom have specific expertise and knowledge in these matters, are willing to advise and assist in any way we can be of help.

The Maryland Ornithological Society is on record supporting the use of progressive effective measures to control depredations of Canada geese, including the use of lethal but humane means to control the resident Canada goose population. We support the use of such measures in this particular situation. We recommend that if lethal, humane methods are employed, that the geese are processed for donation to non-profit food banks and programs to feed the homeless and hungry.

Respectfully submitted,

Maureen Harvey



**THE AUDUBON SOCIETY
of the DISTRICT OF COLUMBIA**

**PO BOX 15726
Washington, DC 20003**

January 2, 2007

Gayle Hazelwood
Superintendent, National Capital Parks East
National Park Service
1900 Anacostia Drive, SE
Washington, DC 20020

RE: Environmental Assessment for resident Canada goose impacts on Anacostia Park

Dear Superintendent Hazelwood,

We were pleased to hear at the December 4, 2006 meeting about the Anacostia River wetlands that National Capital Parks—East has identified a staff member to complete the Environmental Assessment of resident Canada goose impacts on Anacostia Park. We commend the National Park Service (NPS) for taking this critical step toward the restoration of these wetlands.

The Audubon Society of the District of Columbia is a non-profit organization of approximately 1,000 members who support the conservation of birds and their habitat, particularly within the urban setting of DC. The mission of the Audubon Society of the District of Columbia is to promote the appreciation and conservation of birds and their habitats through the education and participation of people in the DC area. We accomplish this mission in part by providing field trips to sites, including national parks, to demonstrate the contribution of these areas to native bird diversity and by taking action to promote the conservation of these lands. The public education and participation that would be sparked by the NEPA process is an opportunity to work together for the common goal of conservation.

We cite the U.S. Geological Survey Patuxent Wildlife Research Center and the University of Maryland Department of Biological Resources Engineering report, "Five Years of Monitoring Reconstructed Tidal Freshwater Wetlands in the Urban Anacostia River (2000-2004)," as evidence that resident Canada geese have overbrowsed the vegetation of Kingman Marsh, resulting in erosion, land subsidence, and reduced seed germination. The introduction of the non-native resident Canada goose has resulted in the destruction of wetland habitat for other native bird species, as described in the DC Department of the Environment's Wildlife Action Plan and in the May 19, 2006 issue of the *Washington City Paper* – "Honk if You Are Destroying an Ecosystem: Canada Geese are Devouring the Anacostia's Precious Marshland."

**Conservation of birds and their habitats
Environmental education
www.dcaudubon.org**



The restoration of the three tidal wetlands around Kingman Marsh and Heritage Island by NPS, the U.S. Army Corps of Engineers, and the District faces tremendous grazing pressure from resident Canada geese. In the restoration areas in which geese were excluded, over 65 plant species including wild rice were identified. In the areas in which geese were not excluded, only two species of restored vegetation remained. Plants such as wild rice (*Zizania aquatica*), a species that once proliferated along the Anacostia, create habitat for important rail species such as Sora (*Ortygometra carolinus*). Sora once thrived along the Anacostia, but now due to a lack of habitat, has been listed as a species of greatest conservation need by the DC Wildlife Action Plan.

The Audubon Society of the District of Columbia supports effective measures to restore native wildlife habitat to Anacostia Park, including lethal but humane management of adult resident Canada geese. We recommend that if lethal, humane methods are employed, that the geese are processed for donation to non-profit food banks and programs to feed the homeless and hungry.

The Audubon Society of the District of Columbia thanks you for your continuing dedication to the Anacostia River.

Respectfully submitted,

Mary Pfaffko
President, Audubon Society of the District of Columbia



January 3, 2007

Gayle Hazelwood, Superintendent
National Park Service
National Capital Parks-East
1900 Anacostia Drive, SE
Washington, DC 20020

Dear Ms. Hazelwood:

I was pleased to hear at a December Anacostia River wetlands restoration meeting that the National Park Service has identified new staff to manage completion of the Environmental Assessment of Canada goose impacts in Anacostia Park. The Anacostia Waterfront Corporation believes timely completion of this National Environmental Policy Act process is necessary to prevent further degradation of the multi-million dollar investments already made in these important wetlands. I am writing to request a meeting to discuss the status of the Environmental Assessment and the anticipated process and schedule for completion.

The Anacostia Waterfront Corporation's mission is to facilitate the economic and environmental revitalization of the Anacostia River watershed in the District of Columbia. In addition to planning a Platinum LEED-certified environmental education center on the southern half of Kingman Island, AWC is planning activities in 2007 to enhance trails and pedestrian access and promote environmental education in the area. The health and viability of wetlands around Kingman Island are key to restoration efforts and to our goal of reconnecting surrounding communities with this important natural resource.

Considerable progress has been made toward wetland restoration by the U.S. Army Corps of Engineers, District Department of the Environment, Anacostia Watershed Society, Earth Conservation Corps, and others working together with the National Park Service. Wetlands in this area serve important environmental and social functions, providing critical habitat for native plants and animals and important vistas of the river. AWC is concerned that efforts to restore and enhance wetlands around Kingman Island are being undercut by the overpopulation of resident Canada geese. Further progress to restore wetlands may depend on National Park Service action to manage the resident geese.

Completion of the National Park Service's Environmental Assessment of goose impacts is a necessary step toward effective restoration. AWC would like to meet to discuss the current status and anything we can do to support your efforts.

AWC thanks you for your continuing dedication to the Anacostia River and stands ready to provide whatever support we can to ensure the long-term viability of healthy, functioning wetlands in the watershed.

Sincerely,

Brendan Shane
Director, Environmental Programs and Policy

cc: Corey Buffo, Director, DC Department of the Environment
Joseph Lawler, Regional Director, National Capital Region

**CAPITOL HILL RESTORATION SOCIETY**

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August 6, 2007

Superintendent
National Capital Parks East
1900 Anacostia Avenue, S.E.
Washington, D.C. 20020

Re: Wetlands Restoration Plan E/A Testimony

**Testimony of the Capitol Hill Restoration Society
to National Park Service's Public Scoping Meetings**

**Anacostia Park Wetlands Restoration Plan/
Environmental Assessment with Resident Canada Goose Management Strategies
July 18, 2007**

The Capitol Hill Restoration Society (CHRS) is a community organization of some 1,000 members. For more than 50 years CHRS has worked to promote and protect all aspects of the well-being of greater Capitol Hill, including the environment. Improving the water quality and natural environment of the Anacostia River are important goals for our members.

CHRS supports all six factors listed as contributing to the success of wetland restoration efforts in Anacostia Park. We wish to comment specifically on these factors: Resident Canada Goose Management, Wetland Vegetation, and Invasives and Exotic Plants.

Resident Canada Goose Management

Kingman Marsh and Heritage Marsh on the Anacostia River are the largest tidal wetlands in the District of Columbia. The health of these marshes is vital to water quality and habitat of many fish and bird species. To restore the marshes, \$6 million was invested to pump in mud and grow aquatic plants. We understand that the plants are growing well. But resident Canada geese are devouring the plants faster than they grow. There is every indication that because they are present in such large numbers, the geese will continue to literally consume the wetlands. On July 10, 2007, 779 resident Canada geese were counted in the Anacostia River area (a record high population, despite killing geese eggs for the last three years).

The situation is urgent. For this reason, CHRS strongly urges that, as soon as possible, the National Park Service complete the public scoping process, weigh competing interests and decide how best to protect these wetlands from damage.

CHRS Wetlands Restoration Plan Testimony of July 18, 2007

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Wetland Vegetation

CHRS strongly supports any effective methods to restore wetlands vegetation. CHRS encouraged its members recently helped to plant arrow arum plants at Kingman Island.

Invasives and Exotic Plants

CHRS urges NPS to map and survey the Anacostia Park wetland areas, and then take action to eliminate invasive trees, plants, and vines. A quick survey indicates that invasives are a problem on the west bank of the Anacostia River. Near RFK Stadium, Reservation 13 (DC General campus), and Barney Circle the following invasives are present as of July 2007: Ailanthus, Chinese privet, Japanese knotweed, and porcelain berry.

Thank you for the opportunity to submit this testimony.

Sincerely,



Richard N. Wolf
President

cc: by email to <http://parkplanning.nps.gov/anac>

Correspondence 12 (Email)
Author: Grace Cunningham
Organization: Sierra Club



Washington, D.C. Chapter
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In consideration of the potential impact of non-native resident Canada geese on wetlands near Kingman and Heritage Islands in the Anacostia River:

The Washington, DC Chapter of the Sierra Club has a history of involvement in wetland restoration in the Anacostia River near Kingman Island and Heritage Island. Our involvement is driven by several important goals: protecting biodiversity, ecological and cultural heritage, and improving water quality in the Anacostia River and downstream. Joint efforts by the Army Corps of Engineers and the District of Columbia government resulted in a large scale reintroduction of wetlands near the islands. However, a large number of Canada geese have taken year-round residence around the wetland restoration areas and threaten this critical restoration effort.

According to the Environmental Protection Agency's (EPA) report, "Washington, DC's Anacostia River Watershed" (June 2006), recent efforts to restore the wetlands were a "tentative success". The EPA cited "voracious grazing" by resident Canada geese as a "stressor" impacting restoration efforts. According to the report, a series of fences and horizontal wires protected some restoration areas from grazing by Canada geese while unfenced areas lost as much as 75% of the wetland plant life introduced during the restoration. Without fencing, the wetlands are especially vulnerable to grazing by resident geese in spring when wetland plants are shorter. Once wetland plants have been devastated, erosion will eventually wash away soils that wetlands depend on, resulting in loss of the restored wetlands. In contrast, migratory Canada geese are not considered a threat to the wetlands because of their migration patterns.

The Chapter feels that fencing is not a potential permanent solution. Fencing obstructs the movement of native wetland species, undermining the potential for restoration of native habitat, including preventing larger fish from accessing the wetland areas. Given already low fish stocks in the Anacostia River, this is an important consideration. Meaningful restoration of wetlands requires attempting to create a sustainable wetland ecosystem. This is challenging in light of the lack of natural predators to Canada geese in a small natural enclave of an otherwise urbanized area.

The Chapter asks the NPS to give priority to restoration of wetlands and native ecosystems in the Environmental Assessment and to adopt a tightly localized, aggressive resident goose management strategy in the restoration areas. Recognizing the critical importance of wetlands, the Chapter encourages the NPS to examine all potential management methods for this undertaking, including humane but lethal options. We are confident that such a strategy offers the greatest benefits to native ecosystems generally. This

determination is informed by the impact of resident (as opposed to migratory) Canada geese on the wetlands and the difficulty of managing an increasingly disbursed resident population in a suburban environment that offers many opportunities for resident geese to escape more routine management efforts, such as oiling and addling.

As we understand Canada geese to exhibit a tendency to remain in a particular area, an aggressive management strategy in wetland areas may be effective even though nearby resident populations are managed through addling and oiling. In many localized contexts in our region, resident Canada geese do not pose a significant ecological threat and passive population management options are appropriate for these contexts.

We consider this case to be exceptional in light of the urgent need to improve water quality in the Anacostia River and beyond, the threat to wetlands, and the size of the goose population immediately surrounding the restoration areas. When wetlands and habitat are at stake, native wildlife populations are also at risk. Wetland restoration is an undeniably critical mission for the NPS to support in the Anacostia River and we have full confidence that NPS recognizes the importance of this issue to the Washington, DC community.

Signed,

Grace Cunningham
Executive Committee Member
Washington, D.C. Chapter of the Sierra Club