

Comments of the Friends of Dyke Marsh on the George Washington Memorial Parkway, National Park Services Concept Plan for the Claude Moore Farm area of Turkey Run Park

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Thank you for the opportunity to provide comments on the three posted concept plans for the Claude Moore Farm area of Turkey Run Park. We appreciate your public process and request for public involvement.

We are especially supportive of the view expressed in a June 19, 2006, proclamation issued by then-U. S. Department of Interior Secretary Dick Kempthorne: "When there is a conflict between conserving resources unimpaired for future generations and the use of those resources, conservation will be predominant." We hope you will prepare a final plan consistent with that vision.

Our May 23, 2019 Comments

We reiterate the main points we made in our May 23 comments to you. We are concerned about National Park Service plans and activities that affect the entire parkway and support enhancing and restoring natural connectivity along the parkway. Many species, like birds, bats and insects, do not respect artificial, human-created boundaries and depend on the natural communities all along the parkway, which is like a "green necklace."

We believe that NPS should be vigilant stewards in protecting the public's natural resources, consistent with the NPS mission: "The National Park Service preserves unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world."

We note that, in terms of Virginians, the state's Outdoors Plan cites a survey indicating that 54 percent of Virginians want more natural areas.

Understanding What's There

Again, we urge you to conduct and provide to the public a comprehensive biological survey, reflecting all seasons, of all of the natural resources present on this property. Planning decisions cannot be fully informed without understanding what natural resources are present. This is basic information for the Park Service and the public, essential for sound decision-making, in our view.

It is especially critical to determine if there are state- or federally-threatened or endangered species on the property. The Potomac Gorge is nearby, has some rare plants and is one of the most complex ecosystems in the country.

How this property will be developed, if at all, used and managed should be decided within the context of natural resources present or potentially restored. In addition, NPS plans should fully consider all environmental impacts and those impacts are difficult to identify and analyze without knowing what natural resources are present that would be affected by planned uses. We look forward to seeing the results of these surveys and/or your data from past surveys.

Strengthening a Conservation Corridor

In 2012, a Northern Virginia Regional Commission study highlighted the need for and goal of reducing habitat fragmentation and creating and expanding conservation corridors across jurisdictional lines. Fortunately, that study designated many GWM Parkway properties as "high value lands."

GWM Parkway is, in part, a valuable conservation corridor in a heavily developed, metropolitan area where most natural areas have been destroyed or impaired and much biodiversity lost. We know, for example, that many species of birds and frogs are in decline. Invasive plants outcompete native plants. The parkway is losing thousands of ash trees to the emerald ash borer. The Claude Moore property offers a prime and rare opportunity to add or enhance another link to this conservation corridor by preserving, restoring and enhancing native habitat.

Improve Water, Air Quality and Biodiversity

Restoring and preserving natural habitat has tremendous environmental benefits, especially in light of the degradation of our natural resources in the metropolitan area. In Fairfax County, for example, over 80 percent of the County's streams are in fair to poor condition, according to County data. The Potomac River's health is improving, but challenges remain. Most jurisdictions in the area do not meet federal air quality standards for ground-level ozone, largely because of vehicle emissions. Much biodiversity has been compromised and lost.

Restoring and preserving natural areas like this park can help reduce polluted runoff into area streams and the Potomac River, filter pollutants and provide other environmental benefits. More natural areas can provide carbon sinks and help reduce the heat island effect. More development, including active recreation, inevitably will mean more polluting vehicular trips, on an already congested parkway. More traffic and park development will likely bring more degradation to our air, water and biodiversity. Those adverse effects are unlikely to be offset.

A Farm Is Duplicative

We are pleased that the concepts do not apparently include a full-blown farm like the former one, although the details of the "interpretive farms with agricultural fields" in "Cultivation + Connection" are unclear. The National Park Service already has an interpretative farm in the Washington, D.C., area, the National Colonial Farm in Piscataway Park (<https://www.nps.gov/pisc/index.htm>) where visitors can learn about colonial farming and another farm at Oxon Hill Park (<https://www.nps.gov/oxhi/index.htm>). Farm fields are typically monocultures of limited environmental benefit and farm operations would presumably require machinery and more vehicles that could create more pollution.

Three Concepts

The "Rejuvenation + Renewal" concept is most consistent with our goals and we believe the most consistent with the National Park Service's mission. We believe the property is better suited as a natural resources-focused park and passive recreation, not active recreation like camping with utility hookups, sports

("Adventure + Exploration") and "interpretive farms with agricultural fields" ("Cultivation + Connection"). These activities would likely create more impervious parking lots, pavilions and other impervious surfaces which increase polluted stormwater runoff and air pollution from vehicular emissions. We question the value of campsites here because NPS already provides well-established camping sites at Prince William Forest Park. Area local governments provide a wide range of active recreational and sports opportunities, a role more appropriate for local governments than for NPS. NPS should not duplicate already provided local and state services, especially since local governments have limited authority and/or do not actively use whatever tools they have to protect natural resources.

We are very supportive of the option to include multiple habitat types, "ecological interpretation points" and more trail connections. Multiple studies document the physical and mental health benefits of experiencing nature. One example is Richard Louv's work which he describes as "nature deficit disorder." The former Claude Moore property could provide more exposure and education to the public of the value of nature and nature's services. A more informed public can mean more vigorous stewardship of our environment and more citizen science, including more volunteers for NPS and more support from elected officials. In addition, fostering multiple habitat types could support a broad diversity of wildlife and help restore some of the biodiversity the region has lost.

We hope you will include a reforestation nursery and reforested fields as proposed in "Rejuvenation + Renewal" in your final plan. We also support creation of pollinator meadows, as some pollinators are in decline. Given the tree loss in the metropolitan area and the important services that trees provide, sustaining and planting more trees would provide many environmental services, including stemming stormwater runoff, promoting air quality and providing habitat for birds and other wildlife.

Reduce Noise Pollution

Some of your options for active recreational uses would apparently create more noise pollution and we urge you to conduct an analysis of the impact of each option on noise.

The NPS Natural Sounds and Night Skies Division has posted this, the "Effects of Noise on Wildlife" (https://www.nps.gov/subjects/sound/effects_wildlife.htm).

"In general, a growing number of studies indicate that animals, like humans, are stressed by noisy environments (Shannon et al. 2015). . . When these effects are combined with other stressors such as winter weather, disease, and food shortages, sound impacts can have important implications for the health and vitality of wildlife populations within a park (Ware et al. 2015).

"These findings are especially significant because national parks are under increasing noise pressure. Noise levels in park transportation corridors today are many times the natural level (Mennitt et al. 2015). Air transportation can also affect life on the ground. . . The result is as much as a 70% reduction in the size of an area in which predators can hear their prey (Barber et al. 2009). Increasingly, careful consideration of the impacts of human-generated noise on wildlife is a critical component of management for healthy ecosystems in our parks."

Therefore, we urge you to prepare a final plan that supports preserving and restoring natural habitat and avoids development, including more parking lots, a farm and active recreation, like camping, sports and athletic fields.

Thank you for the opportunity to provide comments. We look forward to working with you on this and other projects and concerns, especially those affecting the Dyke Marsh Wildlife Preserve.