

Comments on the GWM Parkway and Mount Vernon Trail Construction, Part 2

From the Friends of Dyke Marsh, www.fodm.org

January 18, 2023

The Friends of Dyke Marsh (FODM), a nonprofit, conservation organization founded in 1976, offers the following comments on the proposed construction for the George Washington Memorial Parkway and Mount Vernon Trail, as announced by NPS on December 6, 2022. Thank you for extending the comment period to January 18, 2023.

These comments are in addition to extensive comments that FODM submitted on January 17, 2023.

Our primary focus is on the 2.5 miles of the trail in the Dyke Marsh Wildlife Preserve. We believe that consistent with NPS's mission, the National Park Service (NPS) should prioritize the preservation and restoration of our finite natural resources.

Seasonal Limitations

We recommend that NPS impose and enforce seasonal limitations on all construction work during the spring to protect, for example, breeding and nesting birds and anadromous fish spawning. NPS appropriately had seasonal limitations on all breakwater and sill construction when contractors were building those structures. Seasonal limitations are a common element of many environmental impact statements, environmental assessments and records of decision.

Many species mate and breed in the spring. We provide just a few examples.

FODM has conducted breeding bird surveys for over 30 years and provided the data to NPS. In 2021, our breeding bird surveys found the following:

- 74 species total;
- 49 species were confirmed as breeders;
- 7 probable breeders;
- 10 possible breeders.

Numbers vary each year because of many factors.

Breeding season dates vary by bird species. Bald eagles (*Haliaeetus leucocephalus*), for example, bring sticks to their nests as early as December and their young fledge in May or June. In recent years, Dyke Marsh has had three active bald eagle nests.

Of particular concern is the marsh wren (*Cistothorus pallustris*) which may be disappearing from this habitat, once the only known nesting area for this bird in the upper Potomac River tidal zone. The last reported female occupied nest was in 2017. In the 1800s, observers reported hundreds of marsh wren nests in the river's wetlands. In 1950, surveyors counted 87 singing males in Dyke Marsh and in 1999, 34 territories; in 2007, six established territories; in 2008, 10 breeding pairs; in 2010 and 2011, 12 established territories; in 2014, 16 territorial males and six nests. NPS's construction work and results should not contribute the further decline in this bird's populations or its disappearance from Dyke Marsh.

We also know that least bitterns (*Ixobrychus exilis*) have retracted their breeding area in recent years. Virginia classifies this bird as a "species of greatest conservation need." The American bittern (*Botaurus lentiginosus*) is classified in Virginia as "extremely rare and critically imperiled" for breeding occurrences and "very rare and imperiled" for non-breeding occurrences.

Several fish species, including herring species, migrate up the Potomac River in the spring to spawn. Wetlands are "fish nurseries." Construction work should not interfere with fish spawning.

Many species are yet to be documented in Dyke Marsh, we believe.