PEPC Project ID: 68832, DocumentID: 131621
Correspondence: 1

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Status:New
Park Correspondence Log:
Date Sent: Sep 5, 2023
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Notes:

Correspondence Text

Fort Dupont Park is the largest and finest forested park in eastern D.C. The proposed project is completely unnecessary and will forever destroy irreplaceable streams, wetlands, interior forest, and wildlife habitat. Surprisingly, NPS bought a bogus bill of goods peddled by the stream construction industry and their government partners. Presenting the alternatives as doing "nothing" vs. destroying the stream corridor and its habitat in order to "restore" is a false choice. It mirrors the burn-a-village-to-save-a-village irrational reasoning employed in Vietnam. And we all know how that turned out.

Why hasn't NPS relied on its own data to make a wiser decision? See "Geology of Fort Dupont Park", Fleming: https://www.nps.gov/cwdw/learn/nature/geology-of-fort-dupont-park.htm and http://www.npshistory.com/publications/fodu/geology.pdf. This geological analysis was commissioned by NPS years ago to help stave off earlier attempts at "reupholstering" the forested streams and wetlands (an excellent term by retired EPA General Counsel and Alexandria resident, Jim Clark).

These engineering-heavy, so-called stream "restoration" efforts are anything but. And government should be honest about that.

"Stream restoration has become a multibillion dollar business with mixed results as to its efficacy. This case study utilizes pre- and post-monitoring data from restoration projects on an urban stream to assess how well stream conditions, publicly stated project goals, and project implementation align. Our research confirms previous studies showing little communication among academic researchers and restoration practitioners as well as provides further evidence

that restoration efforts tend to focus on small-scale, specific sites without considering broader land use patterns. This study advances our understanding of restoration by documenting that although improving ecological conditions is a stated goal for restoration projects, the implemented measures are not always focused on those issues that are the most ecologically salient. What these projects have accomplished is to protect the built environment and promote positive public perception. We argue that these disconnects among publicized goals for restoration, the implemented features, and actual stream conditions may create a false image of what an ecologically stable stream looks like and therefore perpetuate a false sense of optimism about the feasibility of restoring urban streams."
https://libres.uncg.edu/ir/asu/f/Cockerill_2014_stream_restoration.pdf.xx.pdf

In actual practice, the so-called stream "restoration" approaches implemented by local governments in the DC region are nearly always fundamentally flawed -- relying on engineers (not biologists and ecologists) with vested interests in using destructive heavy equipment who recommend expensive terraforming of streams while leaving the underlying drivers of urban stream syndrome unaddressed. They inflict extensive, irreversible ecological and environmental destruction on sensitive, vulnerable local waterways while failing to provide the long-term ecological and environmental improvements that are desperately needed.

"Despite the complexity of these stressors, a large number of stream restoration projects focus primarily on physical channel characteristics. We show that this is not a wise investment if ecological recovery is the goal. Managers should critically diagnose the stressors impacting an impaired stream and invest resources first in repairing those problems most likely to limit restoration." Source: https://onlinelibrary.wiley.com/doi/full/10.1111/j.1365-2427.2009.02372.x.

Streams can never replace the function of an entire watershed: There is no question that many urban streams are in trouble. Our streams are being asked to shoulder the runoff burden of entire watersheds, whose imperviousness is growing and generating increasingly larger volumes of stormwater runoff at a time when climate change also is increasing atmospheric water vapor and rainfall intensity.

"[S]ome scientists say controlling erosion is only one facet of restoring a waterway. They say its benefits don't last if nothing else is done to reduce runoff from development before it pours into the stream.

"'You can't ask a stream to do everything an entire watershed should do,'" said Margaret A. Palmer, a University of Maryland scientist who's researched restoration ecology. She's published studies finding "no consistent evidence" that restored streams reduce nitrogen, another key pollutant fouling the bay.

"And while stabilizing stream channels may reduce erosion at first, she said, the benefit is likely to decrease over time." Source: https://www.baltimoresun.com/maryland/baltimore-county/bs-md-stream-restoration-20141009-story.html

We have seen this time and again in Arlington County, where county government has completely ignored more recent science that clearly demonstrates the failure of these overengineed "solutions" to stream-bed erosion driven by too much unchecked runoff flowing from impervious surfaces in heavily urbanized areas like D.C. and much of Northern Virginia and metro Maryland.

Perverse incentives lead to poor outcomes: Local governments and their federal counterparts at NPS have been given perverse incentives by poor regulatory regimes (largely the result of the lobbying efforts of those directly benefiting from these destructive "restoration" practices), which incentivize expedient, counterproductive approaches providing -- at best -- only temporary improvements that come at great cost. Stream restoration is the "easy button" way to rack up lots of stormwater credits for doing little or nothing to improve water quality, biodiversity or preserving/improving stream ecology.

Likewise, these lucrative, highly destructive projects -- all of which use expensive heavy equipment and more destructive human intervention than is necessary -- have created an army of contractors and consultants, creating a privatized market worth more than $1 billion annually by the mid-1990s (Bernhardt et al., 2005). See "Privatizing stream restoration in the US" by Lave, Doyle and Robertson (2010): http://sss.sagepub.com/content/40/5/677

Consultants and contractors who have invested in heavy equipment are the ones who exclusively bid on these stream restoration projects, which, in turn, means that requests for proposals tend to be drafted more to accommodate the designs and desires of the consultants and contractors rather than the actual needs of the watersheds and streams.

It comes as no surprise that the outcomes of these projects are suboptimal.

Below are several such analyses of various stream "restoration" proposals and completed projects in Virginia whose designs are ecologically destructive, unsustainable and whose long-term outcomes are unlikely to meet their stated objectives:

• "Analysis of the Stream Restoration Design of Donaldson Run Tributary B in Arlington, VA," prepared by Dr. John Field, President, PhD, PG, Field Geology Services (stream restoration specialists), Portland, Maine: https://arlingtontreeactiongroup.org/wp-content/uploads/2021/03/12-3-20-John-Field-Donaldson-Run-restoration-analysis-final.pdf

• Dr. Field's presentation to the Fairfax County Board of Supervisors "Comments on Natural Channel Design Approach to Stream Restoration in Hollin Hills and Throughout Fairfax County" December 1, 2020: https://www.youtube.com/watch?v=koeBJjh7Uwk

• "Why Natural Channel Design Projects Are Incompatible with Natural Resource Protection and the Preservation of Native Biodiversity," City of Alexandria Environmental Policy Commission (EPC), December 14, 2020: https://www.alexandriava.gov/uploadedFiles/tes/oeq/info/Why Natural Channel Design Projects are Incompatible With Natural Resource Protection and the Preservation of Native Biodiversity

- 14 Dec 2020 EPC Meeting - Copy.pdf

Misapplying Rosgen's classification and deliberately misunderstanding eastern Fall Zone hydrology and stream geomorphology is a sure recipe for failure and the mismanagement of public funds.

"A Lack of Adherence to Scientific Integrity Imperils Protected Seepage Wetlands and Forested Stream Valleys in Maryland, D.C., and Virginia," published in Marilandica (Vol. 12, No. 1) in 2021, offers several examples (including photos) of the misclassification of local streams for stream "restoration" projects in the DMV: https://mdflora.org/resources/Publications/Marilandica/marilandica_v12n1.pdf.

Moreover, substituting averages and proxy measurements (e.g., phosphorus and other nutrients/pollutants) taken along streams from outside our region -- places with conditions very different from local ones -- in place of actual before-and-after measurements taken in the project area is both unscientific and leads to drawing unfounded conclusions and selecting inappropriate remedies.

See "Evaluation of the Mehlich-3 soil test for phosphorus with implications for calculating pollution reduction credits in the mid-Atlantic region," by R.H. Simmons, March 2021, pp.30-31: https://rms.memberclicks.net/assets/Journals-Newsletters/2021 Summer.pdf

In summary, stream "restoration" as is currently proposed for the Fort Dupont Part stream and wetlands is a recipe for ecosystem destruction, increased sediment erosion into the Potomac River, and worsening water quality and flash-flood conditions over time. Pretending otherwise is irresponsible and will not reverse the problems directly attributable to the speed and volume of runoff, which is increasing due to increasing imperviousness of the watershed outside the riparian corridor.

The massive loss of riparian trees is one of the most egregious features of these "restoration" projects. Not only are mature riparian trees and vegetation essential in maintaining stream bank integrity, improving water quality and limiting sediment erosion, but they also represent huge (in terms of metric tons) reservoirs of sequestered carbon. Their loss runs counter to NPS's/the federal government's stated carbon reduction/climate change goals.

See "RIPARIAN FOREST BUFFER: Function and Design for Protection and Enhancement of Water Resources," USDA Forest Service, https://www.fs.usda.gov/nrs/pubs/na/NA-PR-07-91.pdf. "The removal of streamside forests has adversely affected the vitality of our water resources."

See also "Riparian Areas: Functions and Strategies for Management," National Academies Press: https://nap.nationalacademies.org/read/10327/chapter/5. "The removal of streamside vegetation not only removes the binding effects of roots upon the soil, but also causes a reduction in the hydraulic roughness of the bank and an increase in flow velocities near the bank (Sedell and Beschta, 1991). Such situations invariably lead to accelerated channel erosion

during subsequent periods of high flow."

In a place like D.C., where deadly flash floods are common, removal of riparian forests have serious consequences. See "Fact Sheet #1: Functions of Riparian Areas for Flood Control," State of Massachusetts: https://archives.lib.state.ma.us/bitstream/handle/2452/617362/ocn971134562.pdf. "Removing streamside forests from riparian areas impairs their ability to provide flood control in several ways. Floodwater detention is substantially reduced by removing the natural barriers of live, decaying and dead woody and other vegetation from the forest floor. Removing streamside forests will also result in an increase in soil compaction and reduction in soil porosity.... [A]ny alteration that decreases the riparian area's ability to absorb precipitation through gradual infiltration into the ground, such as the removal of forest cover or an increase in impervious surfaces, will contribute to an increase in the frequency, duration and severity of flooding events downstream.

"All of these impacts combine to cause a significant decrease in infiltration and a subsequent increase in the speed and amount of flood runoff. Furthermore, floodwater reduction through transpiration is likely to be reduced, as grass transpires much less water than forest vegetation. Last but not least, removal of vegetative cover from riparian areas results in more sediment being delivered into the river. Excessive sedimentation reduces flood storage, as eroded sediments settle out of the current and fill channels and deeper spots on the river so they can no longer convey or hold as much water. This reduction of storage capacity increases peak discharges and the likelihood of flood damage."

These so-called "restoration" projects typically address stream bank down-cutting in one of two ways: They remove tons of existing soil to level banks, also removing critical portions of riparian forests that keep the soil in place and facilitate greater water infiltration into the soil. Or they "bury" streams in tons of loose fill that kills existing stream biota. Either way, these attempts do nothing to address the speed and volume of stormwater inputs, which means the erosion will continue and likely will worsen, sending more sediment downstream and into the Potomac River.

These methods often represent a misguided attempt to "reconnect" a stream with its "floodplain" -- even streams that were NEVER connected to a floodplain in the first place. The mechanism is designed to slow down the speed of waters in the stream bed by spreading it out horizontally. It does indeed slow the water down, but this also leads to higher stream temperatures and anoxia in low-flow conditions -- killing off all or most life in the stream. In high-flow conditions, the slowing down of the water leads to a reduction in through-put that exacerbates flooding.

This analysis notes that "restored" streams being studied had returned to their prerestoration "flashiness" within 3 years of having been "restored": "Long-term assessment of floodplain reconnection as a stream restoration approach for managing nitrogen in ground and surface waters," Urban Ecosystems, https://pubmed.ncbi.nlm.nih.gov/35561157/.

There are simpler, more effective, less destructive and cheaper methods to help mitigate. I urge

NPS to explore methods that are more holistic (address runoff speed and volume closer to the source/generation, not after it ends up in the stream), offers better ecological uplift and is less damaging to the stream's riparian forest and existing biota.

See, for example, “Biologists examine low-cost ways to improve urban streams” (2022): https://phys.org/news/2022-05-biologists-low-cost-ways-urban-streams.html.

Nature-based solutions can be more self-sustaining alternatives that produce better, more long-lasting results. See
“Soil and Water Bioengineering (SWB) is and has always been a nature-based solution (NBS): a reasoned comparison of terms and definitions,” Ecological Engineering: https://www.sciencedirect.com/science/article/pii/S0925857422001483

I ask NPS to reexamine its proposal and to employ alternatives that are cheaper, less destructive and more effective. Working with and harnessing nature rather than trying (and failing) to replicate nature by first destroying it is far closer to NPS's mandate to preserve the publics natural resources for the benefit of generations to come.

Thank you for your time and consideration.

Suzanne Smith Sundburg
Arlington, Va.

PEPC Project ID: 68832, DocumentID: 131621
Correspondence: 2

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Correspondence Information

Status:New	Park Correspondence Log:
Date Sent: Sep 8, 2023	Date Received: Sep 8, 2023
Number of Signatures: 1	Form Letter: No
Notes:	

Correspondence Text

General Comment:
I am very supportive of the Fort Dupont Creek stream and wetland restoration project at Fort Dupont Park in southeast Washington, D.C. This stream was degraded when COG surveyed the stream in 1998 and since that time, the degradation has worsened.

Along with the many upland stormwater control projects installed since 2005, this proposed stream and wetland restoration project will, importantly, improve water quality and aquatic habitats to support the flora and fauna in Fort Dupont stream. In addition, residents and park recreationalists will have access to a safe and a clean community asset. Finally, these restorative approaches will be resilient to withstand adverse impacts from changing environmental and climate conditions.

Thank you for this opportunity to provide comments.

Detailed Comments:
Page 1 Paragraph 3: The American eel should be listed as the fish that benefits from barrier removal.
Page 2: The restoration approaches should first highlight that these improved conditions should greatly benefit the flora and fauna in Fort Dupont Park.
Page 4 (Figure 1): Evaluate the integrity of this Fort Davis CMP culvert. Deteriorating invert conditions were observed in 2000.
Page 11 (Table 1, PA-04): PA-04 is a coolwater tributary. The drainage area is practically all vegetated and almost all wooded. This condition does not exist elsewhere in the terraced

Anacostia coastal plain. In addition, as shown in the COG 2000 report, stream temperatures were at or below the 20 degree Celsius 90 percent of the time during the summer period. The presence of stoneflies was also documented. In a 2022 reconnaissance surveys, fish and winter stoneflies (a second species) were observed in the PA-04 below the piped stream section. Regardless of the stream water source, the restoration approach for PA-04 should enhance the aquatic habitat and maintain this coolwater thermal regime to protect this refugia.

Page 11 (Table 1, PA-04 Stage 0/Wetland Complex): PA-04 is a coolwater tributary. The stage 0/wetland complex approach may permanently open the canopy for this coolwater tributary. Once this stream section is daylighted, is it possible to bring the stream channel up and use the base flow channel/regenerative stream rather than the stage 0/wetland complex approach?
Page 11 (Table 1, PA-09 Stage 0/Wetland Complex): The stage0/Wetland Complex in PA-09 is a valid approach but, there needs to be a base flow channel in the wetland complex that connects to both the downstream and the upstream. There are fish in Fort Dupont and a main or baseflow channel should be included in this approach for low flow conditions at all channel development stages.
Page 20 (Figure 6, PA-04): There is an opportunity to enhance the existing wetland upstream of the first RSC. This is a low, relatively flat area and the soils are saturated year-round.
Page 40 (Table 9, Tributary 2): Row Tributary 2 (PA-04) Waters Type (Cowardin Classification) = Upper Perennial/Intermittent.

PEPC Project ID: 68832, DocumentID: 131621
Correspondence: 3

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Status:New
Park Correspondence Log:
Date Sent: Sep 10, 2023
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Number of Signatures: 1
Form Letter: No
Notes:

Correspondence Text

Kudos to NPS for preparing this excellent EA.

I strongly support and applaud Alternative B, the proposed action and NPS preferred alternative. This proposed work is reasonable, necessary, and in the public interest.

If there is sufficient riparian trees and vegetation to support them, I urge NPS to pursue the reintroduction of beavers. Beavers would provide similar benefits for free and over the long term.

Given the worsening climate and extinction crises, I also urge NPS to minimize the use of fossil fuels and to maximize the protection and restoration of connected natural habitats to maintain biodiversity.

Thank you for considering my input.

PEPC Project ID: 68832, DocumentID: 131621
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Status:New	Park Correspondence Log:
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Notes:	

Correspondence Text

i am very excited to hear about this project!! Ward 7 is the most neglected ward within DC in terms of revitalization, new construction . heathy food options, metro train stations and over all! Please clean up fort dupont park and bring back the summer concert series. We need fun and productive activities!!

PEPC Project ID: 68832, DocumentID: 131621
Correspondence: 5

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Status:New	Park Correspondence Log:
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Notes:	

Correspondence Text

NPS describes Alternative B, the preferred alternative for the Fort Dupont Creek Stream and Wetland Restoration Project as follows: “These approaches included floodplain reconnection, valley restoration, natural channel design, and regenerative stormwater conveyance (RSC)”.

Regarding these techniques, the Environmental Assessment, Table 1. Summary of Proposed Restoration Approaches by Project Area (p. 11), indicates that no less than 11,570 feet of stream restoration consists of Baseflow Channel/Regenerative Stream Design. This technique constitutes 61 percent of the 18,900 linear feet of stream that NPS proposes to employ to restore Fort Dupont Creek under Alternative B (p. 39). So clearly the efficacy of this particular treatment is crucial to the success of the project.

Yet a recent detailed analysis by Tetra Tech and UMCES-Chesapeake Biological Laboratory on Regenerative Stream Conveyance (RSC) treatments to restore degraded streams reached the following conclusion:

“We sampled and analyzed the aquatic vertebrate communities (fish and herpetofauna) in 11 streams that have been converted to RSCs, along with 24 comparable references of three types. In general, RSC fish communities were more similar to low-quality single streams than to high-quality single streams or stream wetland complexes. Specifically, fish diversity in RSCs was lower than in high-quality sites and decreased with higher conductivity and lower dissolved oxygen. Sensitive fish species found in high-quality references (e.g., creek chubsucker, fallfish, madtoms, lampreys) were absent from RSCs and low-quality sites. Fish indices of biotic

integrity (IBIs) were also lower in RSCs than in high-quality sites, but may be higher than in low-quality sites. While RSCs recreated the physical conditions typical of high-order stream wetland complexes in low-order reaches, they did not attain the levels of dissolved oxygen, conductivity, and flow found in high quality sites. Herpetofauna diversity showed few patterns, expect for higher frog abundance in RSCs than references. Overall, vertebrate uplift in RSCs appears to be constrained by continuing poor water quality. These results should help practitioners and regulators develop realistic expectations of biotic resource changes that occur when defined-channel stream systems are transformed into less-defined stream wetland complexes in urban-suburban settings."

"Vertebrate Community Response to Regenerative Stream Conveyance (RSC) Restoration as a Resource Trade-Of (September 30, 2021)"

https://cbtrust.org/wp-content/uploads/FINAL-Report-for-18002-Tetra-Tech-CBL-CBT-RR-Vertebrates-in-RSCs-30SEP2021-Submitted-to-CBT.pdf

Given NPS' reliance upon a recently debunked technique for restoring Fort Dupont Creek, the likelihood of the success of this project in actually restoring the creek is doubtful.

PEPC Project ID: 68832, DocumentID: 131621
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Status:New	Park Correspondence Log:
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Notes:	

Correspondence Text

Stream restoration projects are decimating our stream valley corridors and clear cutting thousands of trees. Trees and vegetation are the single most important means of stabilizing soil from erosion. Stream restoration projects strip every inch of vegetation down to bare dirt. They demolish critical wildlife habitat and provide NO aquatic “uplift” (improvement) in aquatic species health.

These projects MUST STOP, immediately !!!!!

Watch my 2 minute Utube video and you'll see for yourself:

The Video is entitled:

“How a stream is restored in Gaithersburg”

PEPC Project ID: 68832, DocumentID: 131621
Correspondence: 7

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Number of Signatures: 1	Form Letter: No
Notes:	

Correspondence Text

I am glad to learn about this potential project. My primary concern is that after restoration the NPS will fail to maintain the area. Most east-of-the-river National Park Service parkland is neglected. I have never seen a park ranger on any trail. Invasives are spreading. Mature trees are being lost. It takes months for trees to get cleared from trails. It is difficult to obtain responses.

PEPC Project ID: 68832, DocumentID: 131621
Correspondence: 8

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Correspondence Information

Status:New
Park Correspondence Log:
Date Sent: Oct 3, 2023
Date Received: Oct 3, 2023
Number of Signatures: 1
Form Letter: No
Notes:

Correspondence Text

October 3, 2023

Superintendent
ATTN: Fort Dupont Creek Stream and Wetland Restoration Project
National Capital Parks - East
1900 Anacostia Drive, SE Washington, DC 20020

The Anacostia Parks & Community Collaborative (APACC) is a network of residents and organizations who come together to improve and celebrate the Anacostia River and its park system. Our membership, which includes environmental experts and diverse local voices, reflects our community-based vision for how the Anacostia River and its surrounding park and river system can support the mental, physical, and economic health of Ward 7 and Ward 8 residents. We appreciate the opportunity to provide comment on the Fort Dupont Creek Stream and Wetland Restoration Environmental Assessment.

Fort Dupont Park is a large, natural area featuring a system of streams and ravines that connect the Anacostia River and its tributaries with the Chesapeake Bay. Historically, the park's main stream valley has experienced severe flooding events and instability caused primarily by excessive stormwater from adjacent streets and neighborhoods. As deeper flooding from more extreme weather events becomes more widespread, thousands of residents and hundreds of properties in Fort Dupont Park area are at risk of being affected in the next few years.

That is why we support the proposal as it will "benefit floodplain functions" and should help

reduce the impact from future weather events. In particular, we support the restoration of miles of streams and acres of wetlands, and updating critical infrastructure with modern equipment to improve stormwater management and minimize soil and sediment loss.

But Fort Dupont Park does more than provide stormwater management for the District. The park serves as a vital community amenity providing space for relaxation and recreation and habitats for wildlife. With over 10 miles of walking trails that pass through wooded areas and the remains of civil war-era fortifications, the park is a living historical site that residents and visitors enjoy daily with outdoor activity. Any proposal to rehabilitate the streams and wetlands should include providing residents with a detailed work plan informing them about park and road closures and the duration of the proposed work, and limiting construction and related noises to regular business hours.

The park's 376 acres is also home to an abundance of wildlife, including possibly the largest collection of intact coastal plain forest in the District. While we support the proposal's restoration and revegetation of the park, APPAC asks that NPS proceed with caution and disturb only as much of the natural environment as the proposal calls for and incorporate as many natural materials as possible to mimic natural processes. Every acre of natural space is precious to the people who live and enjoy the beauty of the park with its trails, summer concert venue and community gardens.

The restoration of Fort Dupont Park's wetlands will help the District achieve its environmental goals, and because pollutants in the Anacostia River and its tributaries exceed District standards, there is an opportunity to also address health disparities east of the river. We applaud the proposal's emphasis on reducing watershed pollutants caused by widespread soil erosion and sediments, and ask that every effort be made to remove other pollutants in the waterways like metals, chemicals and garbage.

Thank you for the opportunity to comment on this important proposal which will benefit residents and visitors who rely on the park for recreation, socializing and relaxation. Thank you.

The Anacostia Parks & Community Collaborative (APACC)

PEPC Project ID: 68832, DocumentID: 131621
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Correspondence Text

The plan and its final implementation are sorely needed; the deterioration of the park in a whole has increased as its usage, especially with the arrival newer residents who travel here mostly by car that live outside the 1/2 mile populated area of old time residential users. (INCLUDING CRUISERS)

What I did not see listed among the items which need “restoring” are the numerous bridges along the traisl in the park. Most of this destruction occurred by storms 20 years ago; and the lack of restoration has increased the usage along the few paths in the park. thus causing congestion and the over use of existing lanes; blocking the natural flow through the park.
The best example is within one of the areas that are listed for wetland “restoration”: the bridge above the creek, near the path besides the amphitheater. When it was in use it allowed for walker/runner to have access to the lower path way and the upper terrace of the park towards Fort Davis Dr. and the visitors center and parking lot.
Because of this natural “loop”, access by those who wanted to use the park for a part of their trek--but not confine to a long excursion via the pathway--was possible. I did it all the time especially when I wanted to get in a quick run but wanted hilly terrain to offer a challenge. Once the bridge was destroyed back in 2002, I stopped using the park for this type of run instead I would avoid the lower section of the park and/or use the various ways along the paved roads mostly through the park while avoiding vehicles if I ran during the day.
Same too the bridge deeper in the park.
And lastly but probably not even remotely possible: there are at least 3 water fountains some how engineered and landscaped across various remote areas of the park: are they a doomed relic left only as a testimony of the grand hubris and success of the early days of park creation or can

they some how, one day be... “restored”?

Thank you for your time, labor and service for the park.

Allen H.Ritter II

PEPC Project ID: 68832, DocumentID: 131621
Correspondence: 10

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Correspondence Text

I am a Professor Emeritus of Environmental Science and have for more than ten years been studying the fauna in small seepage springs in NPS parklands, especially NACE. These small seepage springs, drain very shallow subterranean habitats (typically less than 1 m deep), underlain by a clay layer, and with an areal extent of about one hectare. The subsurface part has been given the name hypotelminorheic by the scientist who first discovered these habitats. What makes these insignificant features of the landscape interesting is their fauna. In the greater Washington, DC area, these seeps contain both amphipods and isopods that are eyeless and without pigment. One species, Hay's spring amphipod, known from seeps in Rock Creek Park, is on the endangered species list. Both amphipods and isopods have been found in Fort Belmont (see Keany, J.M., M.C. Christman, M. Milton, K.L. Knee, H. Gilbert, and D.C. Culver. 2018. Distribution and structure of shallow subterranean aquatic arthropod communities in the parklands of Washington, D.C. Ecohydrology 12:e2044.). Related habitats, called macropore springs, which is wedged between two clay layers and slightly deeper, also has unique amphipods and isopods. Of particular note are two recently discovered species. One is an isopod only known from Fort Davis Park, and the other is an amphipod only known from Shepherd Parkway. Both descriptions are either in press or in review. The amphipod is likely one of several as yet undescribed cryptic species in the genus Stygobromus.

The proposed stream and wetland restoration of Fort Dupont creek would at least seriously impair, and likely extirpate any hypothelminorheic or macropore spring populations in the area. The addition of soil would result in compaction of existing habitat, and any loss of tree cover would likewise be highly detrimental (see Burch, E., D.C. Culver, M. Alonzo, and E.J. Malloy. 2022. Landscape features and forest maturity promote the occurrence of macroinvertebrates

specialized for seepage springs in urban forests in Washington, DC. Aquatic Conservation: Marine and Freshwater Ecosystems 32:922-929. doi: 10.1002/aqc.3803.) The restoration actions might be mediated by recolonization, but this is not certain, and in any case would take decades (see Culver, D.C., D.J. Feller, and E. Burch. 2023. Evidence for metapopulation structure in seep-dwelling amphipods. Subterranean Biology 45:157-164. https://doi:10.3897/subtbiol.45.103939).

I would be happy to comment further or answer any questions.

David Culver

PEPC Project ID: 68832, DocumentID: 131621
Correspondence: 11

Comment Received via Email to NPS
October 4, 2023

To: Superintendent Tara Morrison, National Park Service, National Capital Parks-East
From: Stephen Syphax, ssyphax@aol.com
Subject: Comments on Fort Dupont Creek Stream and Wetland Restoration Project EA
(It appears PEPC site is down this evening? Please accept my comments below and forward as necessary)

I'm pleased to see this project going forward. My apologies if my comments are off due to the site changes over the last decade or so since I've been on-site. Further, while I had hastily scanned the EA earlier, it seems PEPC is down on this last comment day (October 4, 2023) and unfortunately, I was unable to figure several details and of the proposed action but wanted to get a few comments in. [Full Disclosure: I'm a retired NPS/NACE resource manager and dealt with many—if not all, of these issues]
General
In PEPC, under Fort Dupont Park, there's no link to the project! In fact, PEPC says no projects at Fort Dupont. That's not good!! [In the metro DC area, everyone has heard of Fort Dupont. Few know National Capital Parks-East]
I was disappointed to see the most bottom reach of the Fort Dupont Stream excluded from the project. Perhaps more than a notion or a separate phase, but I recommend considering redefining the project area to extend to the mouth of the Fort Dupont Stream at the historic Anacostia River Seawall. I think some modification of that highly disturbed and invasive plant infested riparian area in effort to reconstruct a (small?) tidal marsh interface behind the seawall is in order here.
PA-1
A primary concern is the upper portion of PA-1. Specifically, the upper area above, and in the vicinity of, the Fort Circle Hiker-Biker Trail crossing where the stream is extremely eroded and there's the extremely incised "V-channel." Past innovative bioengineering concepts required extensive removal of forest just to allow access for the construction equipment to build-up and armor the eroding stream bank. It was almost as if you had to cut down the forest to save it
At that time all plans addressed armoring the streambanks against the heavy stormflows but proposed nothing to address/manage damaging stormflows them prior to entering the park in the first place at the Burns Street outfall. Therefore, I hope consideration is given to constructing some sort of stormwater forebay or vault under Burns Street above that outfall (assuming property acquisition across Burns Street is not feasible?) to manage and reduce the impacts of storm flows entering the park. This could reduce the need for tree removal and extensive stream work in that upper reach. Ideally, the trail crossing could be replaced with a bridge. Further downstream below trail crossing I assume some transition will be required (for correcting collapsed headwall, etc.) but access for that necessary work is much easier downstream.
I'm thinking no action is really needed for the spring seep input a few yards up above the PA-1 outfall along Burns Street… beyond possibly invasive plant management?

There appears to be a staging area proposed across from the Ridge Playground. I assume it's for work associated with the collapsed headwall? In any event, I believe that is a wooded area. This staging area, and all staging/stockpile areas should avoid forested areas and be relocated to the adjacent street or turf areas.
PA-4
I believe a similar stormwater "forebay" system described in my PA-1 comment was proposed by John Galli (of Metropolitan Washing Council of Governments) in his Fort Dupont Park Watershed Study some years ago for underneath Fort Dupont Drive adjacent to PA-4 to manage damaging stormflows in that project area. If not already, that should be considered for PA-1. NACE RM Office should have that Galli document. NACE RM Office should have that document.
Thank you for the opportunity to comment on this extremely worthwhile project.
Hello Josh Burch!
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