

**Comments of BoatU.S. regarding EIS No. 20140006
Draft EIS, NPS, VA,
Dyke Marsh Wetland Restoration and
Long-term Management Plan**

March 14, 2014

BoatU.S. is the largest organization of recreational boat owners in the United States, with more than 500,000 members nationwide and over 51,000 members in Virginia, Maryland and the District of Columbia. On behalf of our members we would like to register our concerns with the implementation of the Dyke Marsh Restoration and Long Term Management Plan and in particular language contained in Alternative C, the alternative preferred by the National Park Service (NPS).

Dyke Marsh and Belle Haven Marina are both a popular boating destination and a critical launching and mooring field for boaters in the Washington area. The two destinations are from a geographical sense, bound to each other. The marina provides a boat ramp, slips, sailboat rental, paddle craft rental and launch, and a sailing school. Area residents launch boats and paddle craft to fish, bird-watch and enjoy the wildlife fostered by Dyke Marsh. The marina serves education programs such as the Chesapeake Bay Foundation's Potomac River Program which teaches conservation and preservation.

It is our strong belief that the vitality of both Dyke Marsh and Belle Haven Marina rely on a balanced management plan that fosters the sustainability of the marsh and the economic viability of the marina. Currently language contained in Alternative C could very easily inhibit or possibly end the prosperity of the marina. We propose that the following language be removed from Alternative C:

“This alternative contains an optional 20-acre restoration cell in the area currently serving as mooring for the marina. Such an option would only be implemented should the marina concession no longer be economically viable for the current concessioner, and no other concessioner expresses interest in taking over the business, eliminating the need for the mooring field.”

Since the NPS is not only the leaseholder to the concessionaire (in this case Belle Haven Marina) but also sets the lease requirements, insurance minimums, and defines what is or is not “economic viability,” we believe that the concessionaire could be denied renewal of the lease at any time. Just over the last 3 years, the insurance required by NPS has increased from \$1,000,000 to

\$5,000,000. Even in the face of such drastic increases, Belle Haven Marina is and has been consistently at 100% slip occupancy with over 400 families on the waiting list for slips. This is important testimony towards the need to maintain the 20 acres of current mooring field. The marina and sailing school also contribute heavily to the local economy by providing 45-50 jobs.

Should this marina be closed there would be no public boat launch for over 20 miles of the Potomac River even though the nation's taxpayers, through the National Park System, pay for a good stretch of maintaining that river shore. Placing the access this marina provides to the urban and suburban population in such jeopardy also directly conflicts with President Obama's America's Great Outdoors Initiative (AGO) to remove obstacles to park access. A key recommendation to come out of the President's AGO initiative is the following (emphasis added):

Recommendation 2.1 — Support outdoor recreation access and opportunities on public lands by establishing a Federal Interagency Committee on Outdoor Recreation

It is important to recognize the importance of maintaining the connection to the water that facilities such as Belle Haven Marina provide, particularly in an urban area such as Washington. For disadvantaged youth, on the water experiences are only made possible by having this kind of recreational facility supported. All of the alternative management proposals limit access for the public and the recreational boater, a management philosophy that directly contradicts the intent of the AGO initiative.

President Obama followed through on the AGO recommendation on June 13, 2011, when he created the Federal Interagency Council on Outdoor Recreation headed by former Secretary Salazar. As a stakeholder organization that is actively engaged in the AGO process, we note several tasks charged to the new Council that are of particular significance in our review of the Dyke Marsh Restoration Plan:

Task: Coordinate recreation management, access and policies across multiple agencies to improve public enjoyment and recreational use of federal lands.

Task: Improve engagement of young people and their families in outdoor recreation through healthy, active lifestyles.

Task: Identify ways to improve access to and benefits from our parks, refuges, and other public lands, waters, and shores for persons with disabilities.

Task: Target underserved and disadvantaged communities for both access and engagement in the benefits of and opportunities for outdoor recreation.

We urge the Park Service to revisit its plans for Dyke Marsh with an eye towards meeting the national recommendations contained in the AGO initiative. The aforementioned language in Alternative C, could strongly jeopardize the attainability of these goals.

We appreciate the delicate balance the NPS must strike in fulfilling its mission of providing access to Dyke Marsh and the Potomac River while preserving the very elements that make these natural areas such attractive destinations. With their close proximity to metropolitan Washington, preserving public access to the marsh and river via support and enhancement of the Belle Haven Marina must be a primary goal of any new management plan.

Additionally, we believe that the dredging of Belle Haven Marina and the use of such dredge material to rebuild eroded areas of Dyke Marsh would be a win-win strategy in moving forward and supporting both entities. Creating deeper slips and mooring areas will help to solidify the area for generations to come, while the use of native soils as fill to restore Dyke Marsh will cut down in refurbishment costs.

As this process moves to the final stages, BoatU.S. strongly believes that a resolution can be reached that both maintains public access to the water while preserving the very outdoors experience our members pursue.