

January 4, 2025

Pleasure House Point Wetland Mitigation Bank

Lynnhaven River NOW supports the proposed Wetland Mitigation Bank project at Pleasure House Point. Wetland restoration at this site has been a part of the plan for Pleasure House Point from the time that the property was acquired by the City.

Tidal wetlands are the most threatened marine habitat in the Lynnhaven River system. Much of our wetlands have been lost to decades of shoreline development that hardened the shoreline with bulkheads drowning the wetlands or they were filled and channelized to create neighborhoods. The remaining wetlands, the majority of which are in our system of marsh islands, are highly vulnerable to sea level rise. With no way to migrate landward, it is estimated that we will lose up to 80% of our remaining wetlands by 2100.

Wetlands provide invaluable benefits for both the ecosystem and for human society. They are natural water filters trapping pollutants and improving water quality. They support a myriad of plant and animal life and are critical for biodiversity conservation. They also serve as vital nursery areas for marine species in the river, the Chesapeake Bay, and the Atlantic Ocean.

Humans benefit from wetlands too. They are crucial buffers against flooding; they play a significant role in carbon sequestration; absorb excess rainwater; and reduce the impacts of storm surge. All these benefits help to make the river and our neighborhoods more resilient.

We all wish that this work could be accomplished with less tree loss. But with careful planning, the tree loss can be mitigated, and the wetlands will provide more species diversity and more ecological and water quality value than the sand fill that is there currently. To ensure that the benefits of this restoration exceed the loss of the tree canopy and the disruptions from the construction process, we request that you consider the following items.

- Prior to the beginning of construction, allow LRNow and other interested non-profits to utilize volunteers to transplant appropriate trees in the project area to other areas of Pleasure House Point or to pots for transplanting into other restoration projects in the city.
- Do a thorough inventory of trees with four inch and larger diameter that will be removed, include species and size. These trees should be replaced following the City's 1:1 replacement policy for all city projects.
- Practice vigilance in the use of silt fences and turbidity curtains to protect the millions of oysters in Pleasure House Creek. Twelve new acres of oyster reef were constructed in the past five years and are thriving with their numbers compounding rapidly. They must be protected.
- As the area leader in sea level rise resiliency work, please carefully plan for predicted sea level rise in the design and construction of this restored wetland area to insure its long-term viability.

- Relocate any identifiable diamondback terrapin nests prior to the beginning of construction and put measures in place to prevent diamondback terrapin from entering the site during construction.

As part of our ongoing water quality monitoring program, LRNow does monthly monitoring in Pleasure House Creek and at the mouth of Crab Creek and Pleasure House Creek. We can provide the water quality monitoring results prior to, during, and following the construction of the wetlands.

In addition, we are interested in collaborating with you to transplant appropriate trees prior to the commencement of construction and look forward to talking with the project managers about starting this work.

The abbreviated public input process on this project has brought two things to light. One, the high level of community investment in Pleasure House Point and two, the lack of understanding in the community regarding the functions and valuable benefits of wetlands. LRNow would like to engage with the Department of Public Works to do periodic public tours of the construction site, as safely concerns allow, as an opportunity for citizens to be informed and learn more about this essential natural habitat.

Thank you for your vision in acquiring the Pleasure House Point property and your commitment to maintaining it as a natural area. We appreciate this opportunity to provide these comments regarding the Wetlands Mitigation Bank proposed for Pleasure House Point.

Karen W Forget

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