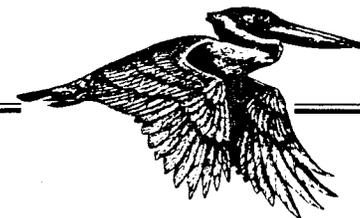


THE Elizabeth River Project



March 19, 2001

Stephen D. Martin
Project Manager, Craney Island Study
US Army Corps of Engineers, Norfolk District
803 Front Street,
Norfolk, VA 23510

Dear Doug,

At the Craney Island stakeholders meeting on 15 January 2002, several points came up on that we would like to comment further on:

1. You mentioned that the scope of the EIS would be expanded to include development of the Port. We welcome this change in scope. As stated previously, we also believe that it would be appropriate to consider the impacts of the third crossing since the road alignment played a major part in dictating viable options for Craney Island Expansion. The three projects are collectively linked and should be considered as one large ecological impact.
2. There were several questions concerning water quality, and I believe the Corps indicated that the expanded scope would also address water quality issues. Again, we strongly support this change in scope as well. We have been urging a study of water quality to include impacts on living resources. We are concerned that the Hydrological Impact study may be falsely extrapolated into Ecological Impacts.
3. While we understand the need to produce a "least cost" solution, the cost here could be far more than dollars. The Hampton Roads community simply cannot allow further degradation of this valuable natural resource.
4. Finally, we remain committed to our search for a win-win solution that is economically as well as environmentally appropriate. It is our firm conviction that to achieve "win-win," bottom restoration is essential compensatory mitigation for bottom lost, and must represent a significant portion of any plan. The anticipated loss of 600 acres of bottom for eastward expansion is equivalent in size to almost a third of the Lafayette branch of the Elizabeth, and represents the loss of some of the river's healthiest bottom in a system with few healthy sediment areas. We are aware of only one mitigation option which might reasonably be expected to offset these impacts: Restoration of contaminated sediments on a scale large enough to produce a net ecological gain. The only site that to our knowledge approaches the necessary scale is the severely degraded bottom offshore of the former Eppinger and Russel Creosote Treatment Facility. Thus this site is our highest priority location for bottom restoration in the compensatory mitigation plans.

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It appears from the comments concerning the MAERSK terminal, possible National Defense Security requirements, and the increase in scope for the EIS that there could be a considerable delay in the completion of the feasibility study.

As we work together to restore and preserve the quality of the Elizabeth River, we believe that environmentally sustainable development is clearly possible. The expansion of Craney Island should produce a functional improvement in the health of the river. Perhaps we should attempt to establish a regular meeting schedule, say quarterly, so that we can share information as this process moves forward. Please call me at your earliest convenience.

Sincerely,



Marjorie Mayfield
Executive Director

cc: Col. David L. Hansen, District Engineer
Craig Seltzer, Chairman, NEPA review committee, Craney Island Study