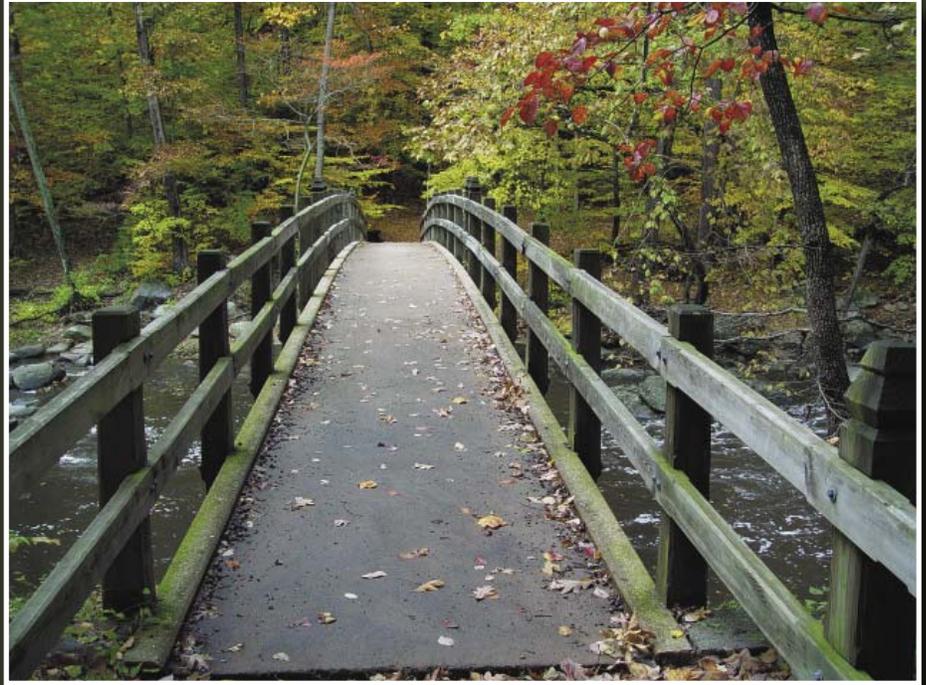




## Rock Creek Park and the Rock Creek and Potomac Parkway





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## INTRODUCTION

A notice of availability for the *Rock Creek Park and the Rock Creek and Potomac Parkway Draft General Management Plan / Environmental Impact Statement* was published in the *Federal Register* on March 14, 2003. This action informed the public that the draft general management plan and environmental impact statement were ready for public review.

Consistent with the requirements of the Council on Environmental Quality for implementing the National Environmental Policy Act (40 *Code of Federal Regulations* Part 1506), the draft environmental impact statement was available for public review for more than the minimum of 60 calendar days from publication of the notice of availability. The actual comment period during which the National Park Service (NPS) accepted written comments was 123 days, and closed on July 15, 2003. Oral comments were received during two public hearings, on May 20 and May 22, 2003.

The *Rock Creek Park and the Rock Creek and Potomac Parkway Draft General Management Plan / Environmental Impact Statement* included the following information.

- The “Purpose of and Need for Action” section presented the history of Rock Creek Park and the Rock Creek and Potomac Parkway, described guidance and direction regarding planning, and identified three decision points that would be addressed by the general management plan alternatives.
- Three action alternatives that would protect the park’s resources and values while providing visitor use consistent with the park’s and parkway’s legislation, purpose, mission, and goals were included in the “Alternatives” section. The alternative to continue current management (the no action alternative) also was described in this section.
- The “Affected Environment” section described existing conditions for each of 11 impact topics.
- The effects of implementing each of the alternatives were presented in the “Environmental Consequences” section.
- The “Consultation and Coordination” section described input by the public and agencies into the process.
- Supporting information was included in the references and appendices.

The National Park Service received more than 3,000 communications on the draft general management plan and environmental impact statement that contained more than 5,000 individual

## INTRODUCTION

comments. This document summarizes the content of the comments and describes how they were addressed.

## GUIDANCE ON RESPONDING TO COMMENTS

Guidance on addressing public comments on an environmental impact statement are provided in Section 4.6 of *Director's Order #12 and Handbook: Conservation Planning, Environmental Impact Analysis, and Decision Making*. This guidance states that the National Park Service is required to respond to all substantive written and oral comments raised by the public or by agencies as part of finalizing the environmental impact statement, and to make every reasonable attempt to consider the issues or alternatives raised.

Substantive comments are defined as those that do one or more of the following:

- (a) question, with reasonable basis, the accuracy of information in the draft environmental impact statement;
- (b) question, with reasonable basis, the adequacy of environmental analysis;
- (c) present reasonable alternatives other than those presented in the draft environmental impact statement; or
- (d) cause changes or revisions in the proposal.

In other words, substantive comments raise, debate, or question a point of fact or policy. Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive.

The guidance in *Director's Order #12 and Handbook* further states that there are several options for responding to comments. They include:

- (a) modifying the alternatives as requested.
- (b) developing and evaluating suggested alternatives.
- (c) supplementing, improving, or modifying the analysis.
- (d) making factual corrections.
- (e) explaining why the comments do not warrant further agency response, citing sources, authorities, or reasons that support the agency's position.

With regard to the format of responses, *Director's Order #12 and Handbook* says that responses to comments that add clarifying or new information should be made in the text of the final environmental impact statement wherever possible. This approach is preferred to providing lengthy responses to individual comments in a separate section (or volume).

Any federal, state, or local agency or tribal letters must be reprinted in full. However, a side-by-side comment-and-response format is not mandatory for agency or other letters.

The guidance acknowledges that it is important for agencies and members of the public to know how the National Park Service responded to their substantive comments. It says that this can be done by providing a short response to each substantive comment. Particularly if the number of comments received is “exceptionally voluminous,” the National Park Service may summarize similar substantive comments and respond to them once. Because the more than 5,000 comments received on the *Rock Creek Park and the Rock Creek and Potomac Parkway Draft General Management Plan / Environmental Impact Statement* were judged to be exceptionally voluminous, the summary approach was used in this volume.

## DEFINITIONS

The following definitions were used throughout this report to characterize the comments received.

*Commenters* include individuals, public agencies, organizations, interest groups, and businesses.

A *communication* is input from a commenter, and can be in the form of a letter; electronic transmittal, such as an e-mail or response to the park web site; post card; petition; or oral testimony.

A *comment* is a portion of a communication that addresses a single subject. It could include such information as an expression of support or opposition to an alternative, additional data regarding the existing condition, or an opinion regarding the adequacy of an analysis.

*Substantive comments*, as defined in Part 4.6.A of *Director’s Order #12 and Handbook*, raise, debate, or question a point of fact or policy. Specifically, they include those comments that meet any one or more of the four criteria listed above under the heading “Guidance on Responding to Comments.”

*Non-substantive comments* do not meet any of the criteria for substantive comments. Typically, they express an opinion, describe the commenter’s personal experience, indicate support of or opposition to the proposed action or alternatives, or agree or disagree with NPS policy.

A *petition* is a communication signed by multiple individuals living at multiple addresses. The National Park Service received four petitions with a total of about 650 signatures. Each petition was recorded as a single communication, but the comment(s) of each signatory were recorded and tallied individually. That is, if a petition with 100 signatures questioned, on a reasonable basis, the adequacy of traffic impacts based on future traffic projections, then 100 substantive comments with regard to adequacy of the traffic analysis were recorded.

## PURPOSE OF THIS VOLUME

This volume is a companion to the *Rock Creek Park and the Rock Creek and Potomac Parkway Final General Management Plan / Environmental Impact Statement*. Organizationally, it is an extension of the “Consultation and Coordination” section of the final environmental impact statement.

## INTRODUCTION

This volume summarizes all of the substantive comments that were received on the draft environmental impact statement. It then provides information on how the National Park Service addressed each substantive comment.

Consistent with NPS guidance, this volume presents the full text of all communications received from agencies, organizations, and businesses. Reproductions of these communications are provided at the end of this document.

## PROCESS FOR MANAGING, ANALYZING, AND RESPONDING TO COMMENTS

This section describes how the more than 3,000 communications and more than 5,000 comments were managed and how responses were prepared.

### Comment Management

Each communication was assigned a unique eight-character identifier consisting of four numerals preceded by rocr (a shortcut designation for Rock Creek Park). Identifiers were assigned sequentially and did not have significance other than providing the ability to track a communication.

Starting at the beginning of a communication, each comment (the text addressing a single subject) was assigned a sequential number, starting with 001. Thus, the comment designated rocr2982.006 regarding acceptability of features such as picnic areas and trails in floodplains could be tracked as the sixth comment in the letter from the U.S. Environmental Protection Agency.

A Microsoft® Access® database was used to manage the comments. It stored the full text of all substantive comments and allowed each comment to be coded by the section and subsection that it addressed in the environmental impact statement. The database also recorded whether the commenter supported or opposed an alternative. Some of the outputs from the database include tallies of the number of communications and comments received, sorting and reporting of comments by topic or issue, and information regarding the communications, such as city or state of origin and the format type, such as e-mail, letter, or petition.

### Content Analysis

Content analysis refers to the process used to compile and correlate similar public comments into a format that was useable by decision-makers and the environmental impact statement preparation team. Content analysis assisted the team in organizing, clarifying, and addressing technical information pursuant to National Environmental Policy Act regulations and the NPS guidance in *Director's Order #12 and Handbook*. It also allowed the team to identify comments that required responses before a final environmental impact statement and record of decision could be issued.

The process included four components:

- Employing a database for comment management. The Microsoft® Access® database used to manage the comments was described above.
- Developing a coding structure.

- Reading and coding each comment.
- Grouping similar comments and selecting one or more representative comments to convey the intent of the group.

The coding structure was developed to help sort comments into logical groups. The coding structure was derived from the range of topics covered in the draft environmental impact statement and followed the organization of that document, which was summarized in its table of contents. The coding structure was designed to capture all comment content rather than to restrict or exclude any content.

All communications were read and analyzed for their component comments, including those of a technical nature; opinions, feelings, and preferences of one element or one alternative over another; and comments of a personal or philosophical nature. All comments were considered, whether they involved many people saying the same thing or were made by a single person expressing a unique point. For each comment in a communication, codes were assigned by one staff person and validated by another. The codes were then entered into the database.

The database was used to help prepare this report. Queries were run to define the entire range of comments, and representative statements that captured the essence of each group of similar comments were identified. A comment code (such as rocr2982.006) is included in each representative comment so the original source document and author can be tracked.

### **Response to Comments**

The focus of the response to comments was on substantive comments. An NPS team reviewed each comment or group of similar comments to determine how it should be addressed, based on the five options listed under “Guidance on Responding to Comments.” A summary of the resolution of each substantive comment is provided in this report.

Common non-substantive comments were included in this report to provide a sense of public sentiment. The National Park Service noted the non-substantive comments but did not make changes in the final environmental impact statement or provide an explanation on why the comments did not warrant further agency response.

### **COMMUNICATIONS**

During the comment period, 3,068 communications were received. Table 1 summarizes the numbers of communications that were received by format. Almost 48 percent of the communications were received electronically, either as e-mails or as electronic messages posted to the park’s web site. Pre-printed post cards supporting one of the alternatives represented about 36 percent of the communications. Another four percent of communications were pre-printed post cards containing hand-written comments, or entirely hand-written post cards. Letters, including both hand-written and typed letters sent on paper, constituted about 10 percent of communications. Oral transcripts of testimony provided at the two public hearings represented three percent of communications. There also were four petitions.

**TABLE 1: NUMBERS OF COMMUNICATIONS RECEIVED BY FORMAT**

<b>Format</b>	<b>Number of Communications</b>
E-mails and electronic messages posted to the park's web site	1,462 (47.7 percent)
Preprinted post card	1,092 (35.6 percent)
Letters, hard copy	284 (9.3 percent)
Hand-written post cards	125 (4.1 percent)
Oral transcripts	101 (3.3 percent)
Petitions	4 (0.1 percent)
Total	3,068

As shown in Table 2, 146 of the 3,068 communications indicated an affiliation. Most of these were organizations and elected officials. The latter group included two members of the U.S. Senate (Senators Barbara A. Mikulski and Paul Sarbanes), two members of the U.S. House of Representatives (Representatives Chris Van Hollen and Eleanor Holmes Norton), and numerous representatives of counties, cities, and advisory neighborhood commissions (ANCs). There also were communications from 30 businesses and 19 communications from federal, state, or regional agencies.

**TABLE 2: NUMBERS OF COMMUNICATIONS INDICATING AN AFFILIATION**

<b>Affiliation</b>	<b>Total Communications</b>	<b>Counting Each Entity Once</b>
Organizations	88	58
Elected officials	19	13
Businesses	30	29
Agencies	19	8
Total	146	108

Many of the organizations and elected officials sent multiple communications. For example, one representative of an advisory neighborhood commission sent three letters and one e-mail, and provided oral testimony, for a total of five communications. Therefore, the last column of Table 2 shows the number of separate entities that sent communications.

Approximately one person in 100 sent three communications, usually by sending the same message by e-mail, in a hard-copy letter, and via the park web site. Only a few people sent in more than three communications, and no one submitted more than seven.

When the communications initially were logged in, the clerk occasionally would note two identical documents, such as an e-mail and a hard copy letter, sent by the same commenter. If the duplication was confirmed by the supervisor, only one copy was entered into the system. Aside from this activity, no effort was made to eliminate duplicates from the database, because multiple communications from a single person or organization would have no effect on the response to comment *content*. Based on the large number of communications and comments, it would only slightly distort the tallies of people supporting or opposing an alternative, or expressing concern about an analysis.

Approximately 10 percent of communications did not include an address that indicated the state or country in which the commenter resided. Table 3 shows the residence location for the remaining 90 percent of commenters. Of these, more than half live in Washington, D.C., about 35 percent live in Maryland, and almost 12 percent live in Virginia. The remaining 1.5 percent reside in 27 states and 5 foreign countries. None of these represented more than 0.5 percent of communications.

**TABLE 3: MOST COMMON STATES OR CITIES OF RESIDENCE FOR COMMENTERS**

<b>State or Country</b>	<b>Communications</b>	<b>Percent of Communications Where Location Was Provided</b>
District of Columbia	1,430	52.2
Maryland	952	34.7
Bethesda	108	3.9
Chevy Chase	229	8.4
Kensington	67	2.4
Potomac	19	0.7
Rockville	50	1.8
Silver Spring	261	9.5
Takoma Park	48	1.8
Virginia	319	11.6
Alexandria	67	2.4
Arlington	124	4.6
Pennsylvania	13	0.5
Illinois, Louisiana, Massachusetts, Michigan, Minnesota, Missouri, New Jersey, New York, North Carolina, Ohio, Tennessee, Texas, Utah, Washington (state), West Virginia, Wyoming, Canada, and England	2 to 6 each	<0.2 each
Alaska, Arkansas, California, Florida, Indiana, Kentucky, Maine, New Mexico, Oregon, Rhode Island, Israel, Japan, and Singapore	1 each	<0.1 each
Total	2,741	89.3 percent of all communications
No residence location provided	327	10.7 percent of all communications

## COMMENTS

The communications included 5,156 individually coded comments.

### Substantive and Non-Substantive Comments

Among the 5,156 individual, coded comments, 3,260 (63 percent) were non-substantive, based on the definitions provided in *Director's Order #12 and Handbook*, Part 4.6.A and presented earlier in this report. The remaining 1,896 coded comments (37 percent) potentially are substantive.

Non-substantive comments included:

## INTRODUCTION

- Opinions or “votes” regarding which alternative the commenter would like to see implemented. These were coded and recorded in the database.
- Descriptions of their own or their family’s uses and experiences in and around the park or parkway. These were not coded or recorded.
- General, unsupported statements (such as “We must continue to protect this unique ecological treasure in our city” or “Implementing this alternative will increase traffic on surrounding streets, add to safety hazards, and increase air pollution). These also were not coded or recorded.

All other comments were classified as substantive and are included in this report.

### **Comments on Each Section of the General Management Plan and Environmental Impact Statement**

Table 4 summarizes the number of comments regarding each section of the general management plan and environmental impact statement. Table 5 presents the number of comments by impact topic within the “Affected Environment” and “Environmental Consequences” sections. Except for comments that identified management alternative preferences, all of these comments were classified as substantive and were considered in the subsequent sections of this report.

Two report sections and the environmental consequences discussions of two impact topics were mentioned in the introductory paragraphs of at least one petition. These report sections and impact topics included decision points, consultation and coordination, air quality, and regional and local transportation. Because each petition signature was counted as a separate comment, the first three categories received more comments than normally would have been expected. The fourth category, regional and local transportation, would have ranked as the most commonly commented-on impact topic even without its mention in two petitions. However, the incorporation of these categories in the petitions had no effect on the analysis of comment *content* or the responses to that content.

### **Comments Used in This Report**

Preparation of this report involved selecting representative comments to express the full range of concerns identified by the public and preparing responses regarding how those comments were addressed. Each comment in this report is identified by a unique number. Table 6 identifies the author of each comment.

Complete communications from agencies (Appendix A), businesses, (Appendix B), and organizations (Appendix C) are included at the end of this volume. Appendix D includes representative examples of form letters, petitions, and postcards

**TABLE 4: DISTRIBUTION OF COMMENTS REGARDING DRAFT GENERAL MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT SECTIONS**

<b>Section</b>	<b>Number of Times Cited in Comments<sup>a/</sup></b>
Purpose of and Need for Action	171
Park History and Use Relative to Management Planning	15
Geographic Area Covered by the General Management Plan	3
Planning Direction or Guidance	50
Decision Points	50, including 44 in one petition
Alternatives or Actions Eliminated from Further Consideration	17
Connected, Cumulative, or Similar Actions	36
Alternatives	4,429
Potential Management Prescriptions	1
The Environmentally Preferred Alternative	1
Alternative A	83
Alternative B	993
Alternative C	250
Alternative D	2,592
New Alternatives or Elements	509
Affected Environment	186; see breakdown in Table 5
Environmental Consequences	1,613; see breakdown in Table 5
Consultation and Coordination	61, including 44 in one petition
References	1
Appendices – Traffic Impacts Modeling	9
Other NEPA issues	38
Miscellaneous topics	25

a/ There were 6,533 comment citations. This exceeded the total number of individual comments because some comments referred to, and were coded for, more than one section of the general management plan and environmental impact statement.

**TABLE 5: DISTRIBUTION OF COMMENTS REGARDING DRAFT GENERAL MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT IMPACT TOPICS**

<b>Impact Topic</b>	<b>Affected Environment</b>	<b>Environmental Consequences Analysis</b>
Air Quality	6	245, including 206 in one petition
Rock Creek and Its Tributaries	12	46
Wetlands and Floodplains	1	3
Deciduous Forests	7	24
Protected and Rare Species	3	6
Other Native Wildlife	19	31
Archeological Resources	1	1
Historic Structures and Cultural Landscapes	4	12
Traditional Park Character and Visitor Experience	50	181
Regional and Local Transportation	55	571, including 250 in two petitions
Community Character	5	38
Access to Facilities	1	181
Health and Safety	22	274
Total	186	1,613

INTRODUCTION

**TABLE 6: COMMUNICATIONS USED IN THIS REPORT,  
ARRANGED BY IDENTIFICATION NUMBER**

<b>Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Affiliation</b>
rocr0304	Faith	Wheeler	
rocr0305	Franz	Jantzen	
rocr0309	Carol Hynes	Assman	
rocr0315	Steve	Coleman	Washington Parks and People
rocr0317	Kathryn	Ferger	
rocr0323	Jessica	Butts	National Parks Conservation Association
rocr0331	Jennifer	Toole	
rocr0332	Steve	Donkin	D.C. Statehood Green Party
rocr0333	David J.	Bardin	Government of the District of Columbia Advisory Neighborhood Commission 3F
rocr0345	Sue	O'Hara	
rocr0354	Carole A.	Shifrin	
rocr0361	Carole A.	Shifrin	
rocr0366	Ralph	Schofer	
rocr0370	William A.	Michie	
rocr0372	George R.	Clark	Forest Hills Citizen Association
rocr0374	Laurie	Collins	Friends of Open Parkways
rocr0377	Bruce D.	Levitt	
rocr0384	Thomas	Broadwater	
rocr0419	Lisa	Scott	
rocr0452	Laurie	Collins	Friends of Open Parkways
rocr0455	John W.	Holleran, Jr.	
rocr0484	Barbara	Peterman	
rocr0490	Irina	Thomas	
rocr0495	Ramon	Jacobson	
rocr0503	Nancy K.	McBride	
rocr0506	David	Hertzfeldt	
rocr0511	Mary C.	Prahinski	
rocr0515	Alice	Evans	
rocr0523	Betsy	Thompson	Rockville, City of
rocr0540	Helen	Gelband	
rocr0550	Peter	McClurkin	
rocr0551	B.	Mays	
rocr0553	Philip	Yin	
rocr0555	Melinda	McLaughlin	
rocr0565	Keith	Laughlin	
rocr0571	James W.	McBride	
rocr0583	M.T.	Wright	
rocr0584	Richard	Parsons	
rocr0597	Mary Pat	Paris	
rocr0598	Paul	Hesse	
rocr0604	Harold	Bardonille	
rocr0608	Ann	Ford	Rollingwood Citizens Association
rocr0609	Joe	Shanahan	
rocr0611	Adam	Johnson	
rocr0623	Lenore	Sek	
rocr0625	Richard A.	Bellin	
rocr0629	Adrian	Verkouteren	
rocr0631	Raphael A.	Yingling	
rocr0644	Gail B.	Mackiernan	
rocr0649	Sally	Wexler	

**TABLE 6: COMMUNICATIONS USED IN THIS REPORT,  
ARRANGED BY IDENTIFICATION NUMBER (CONTINUED)**

<b>Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Affiliation</b>
rocr0651	Karen	Hantman	
rocr0661	Robert	Watters	
rocr0664	Brian	Caine	Signatory Residents of the 1400 block of Taylor St
rocr0686	Dan	Nachtigal	
rocr0699	Michael	Rhode	
rocr0701	Edward L.	Hunter	
rocr0707	Nick	Williams	
rocr0711	Mike	Kulhanek	
rocr0712	John	Hubbell	
rocr0716	James	Treworgy	
rocr0724	Karen and Dean	Cooper	
rocr0730	Alex	Belinfante	
rocr0732	Richard	Albores	
rocr0736	J. Kelley	Summers	
rocr0741	Roberta	Carroll	
rocr0749	Dick	Hammerschlag	
rocr0750	Margaret G.	Johnson	
rocr0755	Robert	Blaunstein	
rocr0756	Judith T.	Irwin	
rocr0764	George R. A.	Jones	
rocr0770		Name Withheld	
rocr0777	Stuart	Kern	
rocr0798	Carol	Thornhill	
rocr0803	Diane	Nemeth	
rocr0809	Randy	Showstack	
rocr0816	Kathryn	Dorko	
rocr0822	Fritz	Hirst	
rocr0824	Walter	Wells	
rocr0825	Peter	McGee	
rocr0826	Paul	DeAnna	Audubon Society of the District of Columbia
rocr0828	Thomas O.	Seitz	
rocr0829	Neal	Fitzpatrick	Audubon Naturalist Society
rocr0837	Ellen	Jones	Washington Area Bicyclist Association
rocr0842		Name Withheld	
rocr0849	Francis C.	McKown	
rocr0908	Virginia	Pinto	
rocr0910	J.B.	Coyle	
rocr0919	Ruthe J.	Swinson	
rocr0934	Sarah	Cohen	
rocr0935	Victoria	McKernan	
rocr0949	Bob	Campbell	NPS, Chesapeake Bay Program Office
rocr0967	Howard	Kaplan	
rocr1096	George	Usher	
rocr1206	Sue	O'Harra	
rocr1393	Michael D.	Tinyk	
rocr1434	Jonathan	Skolnik	Jack Faucett Association, Inc.
rocr1451	Kevin	Fitzpatrick	
rocr1460	Sally	Rainey	
rocr1461	Marguerite W.	Coomes	
rocr1477	Geraldine M.	Otremba	
rocr1481	Frederick L.	Miller, Jr.	

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**TABLE 6: COMMUNICATIONS USED IN THIS REPORT,  
ARRANGED BY IDENTIFICATION NUMBER (CONTINUED)**

<b>Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Affiliation</b>
rocr1516	Daphne	Henry	
rocr1522	Michael F.	Jacobson	
rocr1523	Issac	Hantman	
rocr1533	Seymour	Deitchman	
rocr1566	Rick	Morgan	
rocr1581	Richard	Abbott	Friends of Pierce Mill
rocr1671	Jac	Smit	Chesapeake and Potomac Regional Alliance
rocr1677	Judith	Shapiro	
rocr1692	Anna	Reid Jhirad	Marigold Productions
rocr1709	Carolyn	Wimbly Martin	
rocr1710	Ann N.	Ford	Rollingwood Citizens Association
rocr1718	Tamara	Halle	
rocr1726	Victor	Thuronyi	
rocr1736	James	Collier	Government of DC, Department of Health
rocr1754	Mary	Prahinski	
rocr1785	Andrea	Ferster	
rocr1803	Alexandra and Donald	Tice	Village of Martin's Additions
rocr1816	Michael A.	Baker	
rocr1817	Megan	Cytron	
rocr2726	Nuri L.	Haltiwanger	
rocr2727	Joneth	Haber	
rocr2729	Thomas	Buzas	
rocr2731	Lisa	Ingegneri	
rocr2736	Allison	Beckin	
rocr2748	Jessica	Carlin	
rocr2751	Howard	Ockene	
rocr2752	J.R.	Keegan	
rocr2753	Sarah G.	Epstein	
rocr2754	Jason E.	Broehm	Sierra Club
rocr2755	Kathryn	Ferger	
rocr2757	Diane	Nemeth	
rocr2759	Michael L.	Wheet	
rocr2762	Patricia	McPherson	Patricia McPherson Interiors
rocr2769	Gale	Barron Black	
rocr2776	Nancy	Henderson	
rocr2787	Jeremiah J.	Barrett	
rocr2788	Lynne	Wyly	
rocr2792	Robert N.	Stearns	
rocr2795	Jonathan R. L.	Sears	
rocr2807	William J.	Gordon	
rocr2822	Judy	Moy Lew	
rocr2838	John & Sara	Thorne	
rocr2846	Philip C. and Diane L.	Olsson	
rocr2850	Jonathan	Gifford	George Mason University, School of Public Policy
rocr2853	Ann	Ford	Rollingwood Citizens Association
rocr2855	James H.	Jones	Crestwood Neighborhood Association
rocr2856	Gabriele	Gandal	Rollingwood Citizens Association
rocr2858	Barbara J.	Ioanes	Woodley Park Community Assoc.
rocr2861	Linda C.	Janey, J.D.	Maryland Department of Planning, State Clearing-house for Intergovernmental Assistance

**TABLE 6: COMMUNICATIONS USED IN THIS REPORT,  
ARRANGED BY IDENTIFICATION NUMBER (CONTINUED)**

<b>Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Affiliation</b>
rocr2862	Dennis N.	Simpson	Regional and Intermodal Planning, Maryland Department of Transportation
rocr2865	Richard R.	Palmer	
rocr2870	Adelaide M.	Miller	
rocr2871	Toivo & Malle	Tagamets	
rocr2872	Nancy d.	Huvendick	
rocr2878	Hal	Bruno	
rocr2884	Colleen	Mahoney	
rocr2885	Thomas L.	Berry	
rocr2887	Francis S.	Carr	
rocr2889	David	Belli	
rocr2894	C. John & Janet	Buresh	
rocr2895	Joseph E.	Evans	
rocr2900	Carey A.	Johnson	
rocr2901	David A.	Cottingham	
rocr2907	Randy	Swart	
rocr2922	James E.	McCarthy	
rocr2923	Steven M.	Wellner	
rocr2925	Jim	McCarthy	People's Alliance for Rock Creek (PARC) Park
rocr2935	Frank	Buchholz	
rocr2945	Carol Hynes	Assman	
rocr2958		petition	
rocr2971	Eleanor Holmes	Norton	United States House of Representatives
rocr2974	Barbara A.	Mikulski	United States Senate
rocr2975	Douglas M.	Duncan	Montgomery Co., Office of the County Executive
rocr2980	Sue	Salmons	
rocr2981	Ken	Ferebee	
rocr2982	William	Arguto	U.S. EPA, Region III
rocr2983	Ronald N.	Spalding	Maryland Department of Transportation
rocr2987	Cathy	Wiss	Government of the District of Columbia Advisory Neighborhood Commission 3F
rocr2988	David J.	Bardin	Government of the District of Columbia Advisory Neighborhood Commission 3F
rocr2994	Chris	Van Hollen	United States House of Representatives
rocr2995	Paul	Sarbanes	United States Senate
rocr2998	Ann N.	Ford	Rollingwood Citizens Association
rocr2999	Gabriele	Gandal	Rollingwood Citizens Association
rocr3000	Fritz	Hirst	
rocr3003			People's Alliance for Rock Creek (PARC) Park
rocr3018	L.K.	Thomas, Jr.,	National Park Service
rocr3022	Jason D.	Robertson	American Whitewater
rocr3024	Barry E.	Cooper	Neo-Tropical Bird Club
rocr3025	Gail B.	Mackiernan	Montgomery County Chapter of the Maryland Ornithological Society
rocr3026	Ms.	Raye-Page	
rocr3027	Marjorie B.	Rachlin	
rocr3028	Renee	Stone	
rocr3029	David J.	Bardin	Government of the District of Columbia Advisory Neighborhood Commission 3F
rocr3030	Anne Hughes	Hargrove	Committee of 100 on the Federal City
rocr3031	Robert D.	Stiehler	Advisory Neighborhood Commission 3 and 4G
rocr3034	Denis I.E.	James	

INTRODUCTION

**TABLE 6: COMMUNICATIONS USED IN THIS REPORT,  
ARRANGED BY IDENTIFICATION NUMBER (CONTINUED)**

<b>Number</b>	<b>First Name</b>	<b>Last Name</b>	<b>Affiliation</b>
rocr3035		petition	
rocr3037		petition	
rocr3040	Ann N.	Ford	Rollingwood Citizens Association
rocr3042	Carol Hynes	Assman	
rocr3047	Marha	Roskowski	
rocr3051	Bob	Sterns	
rocr3056	David	Wilson	Sixteenth Street Heights Civic Association
rocr3058	Darryl	Anderson	
rocr3061	Susan	Subak	
rocr3063	Barbara	McCann	Washington Area Bicyclist Association
rocr3064	Jac	Smit	Chesapeake and Potomac Regional Alliance
rocr3066	Jim	McCarthy	People's Alliance for Rock Creek (PARC)
rocr3068	Victor	Thuronyi	
rocr3073	Jim	Frazier	
rocr3075	Geraldine	Otremba	
rocr3079	David	Bardin	Government of the District of Columbia Advisory Neighborhood Commission 3F
rocr3085	Joan	Hoyte	Sheppard Park Citizens Associations
rocr3093	Maryann	Lasch	Committee of 100, subcommittee for Parks and Environment
rocr3095	Fritz	Hirst	
rocr3097	Phillip	Olsson	
rocr3104	Randy	Showstack	
rocr3105	Gail	Mackiernan	Montgomery County Chapter of the Maryland Or- nithological Society
rocr3106	Barry E.	Cooper	Neo-Tropical Bird Club
rocr3107	Steve	Dryden	Audubon Naturalist Society
rocr3108	Frank	Buchholz	
rocr3109	Gail	Black	
rocr3112	Ken	Thomas	
rocr3113	Jason	Broehm	Sierra Club
rocr3115	George	Jones	
rocr3118	David	James	
rocr3119	Peter	Harnik	People's Alliance for Rock Creek (PARC) Park
rocr3121	David	Cottingham	
rocr3128	Joel	Braude	
rocr3129	Major Gen.	Enemark	
rocr3130	Ernie	Brooks	Coalition for the Capital Crescent Trail
rocr3132	Bill	Freese	
rocr3135	Lou	Aronica	Maryland Native Plant Society
rocr3139	Jac	Smit	Chesapeake and Potomac Regional Alliance
rocr3140	David	Wilson	Sixteenth Street Heights Civic Association

## PURPOSE OF AND NEED FOR ACTION

About 170 of the comments addressed the "Purpose of and Need for Action" section of the draft general management plan and environmental impact statement.

### PARK HISTORY AND USE RELATIVE TO MANAGEMENT PLANNING

#### Issue 1: Include Historical Information

**Comments:** Two comments (rocr0949.007 and rocr2769.018) provided historical information regarding the park, parkway, and the regional context in which planning should be considered.

**Response:** Information from both of these sources was incorporated into the final environmental impact statement.

#### Issue 2: Modify Maps

**Comment:** Please add the beautiful, detailed map of Rock Creek Park that is posted on your web site ([www.nps.gov/rocr/](http://www.nps.gov/rocr/)). It provides important details omitted from maps in the draft GMP/EIS that will be needed to understand all issues and alternatives.

Page 7. Vicinity. Please update the map to show the wards as redistricted, effective 2002, and please update the ANCs. (ANCs were redistricted effective 2003.) The draft uses pre-2002 boundaries for the areas covered by the GMP/EIS and immediately adjacent to them.

Text at page 155, 2nd paragraph, refers to a ward-boundary map as the "Neighborhood" map when it should refer to the "Vicinity" map.

Page 11. Existing Conditions. Please change the color coding. The red-orange or orange-red used for "Paved Trail" and "Unpaved Trail" are indistinguishable.

Page 157. Neighborhoods. Please review map for accuracy and qualify the information depicted: Some neighborhoods are well known; others were names selected for subdivisions as long as a century ago some of which stuck and others of which did not (and may seem quaint today). Moreover, neighborhood boundaries in common usage and understanding often evolve or shift back and forth. So, too, neighborhood names change back and forth. Specific examples of names to question include "Hillcrest" and the second "North Cleveland Park". The draft GMP/EIS shows a "Hillcrest" in the Kalorama area (there being a different, famous "Hillcrest" neighborhood across town, near Southern Avenue). The draft GMP/EIS designates two areas as "North Cleveland Park" - one to the north, but the other to the south of the "Cleveland Park" neighborhood. (rocr0333.001, .002, .003, and .004)

## PURPOSE OF AND NEED FOR ACTION

**Response:** Consistent with this suggestion, the map of Rock Creek Park from the NPS' Internet site was used in the final general management plan and environmental impact statement. This map replaced the "Existing Conditions" map on page 11 of the draft document. This substitution resolved the color coding noted in the comment.

Ward boundaries were included in the draft general management plan and environmental impact statement because socioeconomic data were available at the ward level for the year 1996, and were more current than the year 1990 census data. The final document incorporated data from the year 2000 census that are organized by the Census Bureau's zip code tabulation areas. Because the wards are no longer needed to present socioeconomic characteristics, and political boundaries are not relevant to the management of Rock Creek Park, the areas of wards, their advisory neighborhood commissions (ANCs), and the neighborhoods were not used in the final document. Therefore, the "Vicinity" and "Neighborhoods" maps were deleted. Zip code tabulation areas were added to the "Existing Conditions" map.

Based on these changes, text references to maps were revised.

### **Issue 3: Focus Is Inappropriate**

**Representative Comment 1:** The plan itself is dominated by descriptions of various transportation alternatives and their various impacts. Far too little attention has been directed at the primary importance of protecting Rock Creek Park's biological integrity. [We] believe that the protection and restoration of the natural resources of Rock Creek Park should be the primary objective of the draft general management plan and environmental impact statement. Unfortunately, this draft inadequately assesses the existing conditions of park resources and falls far short of providing the management directions needed to protect and restore park natural resources in the future. (rocr0829.003)

**Representative Comment 2:** Preserving the natural environment is cited as being the primary purpose for establishing Rock Creek Park. Visitor services and recreation are to be limited to what is "appropriate to the preservation of the park's natural and cultural resources". However, improving natural resource management is given little consideration within the GMP draft. It seems to me that the management document that will determine our direction for the next 20 years should be written to emphasize the need to weigh all activities in the park against our basic mission — "to preserve and perpetuate for this and future generations the ecological resources of the Rock Creek valley." This is the prime opportunity to establish these values and to make clear the need for more diligence and effort in maintaining and enhancing the natural resources. Instead it seems like the natural environment is being ignored. (rocr2980.001)

**Response:** Protection of natural resources in national parks is mandated by the 1916 Organic Act. The servicewide mandates and policies on pages 15 through 28 of the draft general management plan provide management directions for these resources in Rock Creek Park. Because management requirements for natural resources are stipulated in these other sources and there would not be substantive differences in their management among the alternatives, the general management plan did not focus on management of the natural resources. Implementation details on natural resource management will be provided in the plans that are prepared after the final general management plan is completed and will tier from that document.

In contrast, transportation management is not specified by servicewide mandates and policies. Therefore, multiple approaches to managing transportation can (and have been) developed for Rock Creek Park within the framework provided by the Organic Act and other laws, regulations, and executive orders.

#### **Issue 4: Address Encroachment**

**Representative Comment:** The GMP or any final GMP should fully explore the question of adjacent landowners and what they do either by outright encroachment of their facilities into the park or pollution of the park. That needs to be a major focus of attention in the GMP, including what resources the Park Service has to deal with it, how you work with the city government, the building permit people, whether that could be improved. (rocr3079.005)

**Response:** The superintendent already has the authority to address encroachment. Therefore, it is not a major focus of the general management plan. Encroachments have been systematically reduced over the past several years.

#### **Issue 5: There Are Other Topics the Plan Should Address**

**Representative Comment 1:** I would like in the management plan a commitment to persist on this [management of invasive plant species]. There are going to be some of the species that are very difficult to eradicate. The Plant Society pledges itself to be of any assistance that we can on this. (rocr3135.002)

**Response:** Consistent with *Management Policies 2001*, the National Park Service has a commitment and policies for managing invasive plant species. These are included in the park's natural resource management plan and will be implemented regardless of the management direction included in the general management plan.

**Representative Comment 2:** The General Management Plan for Rock Creek National Park is woefully inadequate in addressing management of Rock Creek. The Plan should specifically authorize canoeing and kayaking in recognition that these activities are a traditional use of the Park and have been for at least 35 years. The namesake river, Rock Creek, is regularly subjected to sewage overflows and urban runoff. It is a tragedy of the first order that the primary river in our Nation's Capitol is not better protected and that the Park Service is not doing more to recognize the problem and improve sanitation such that other recreation activities such as fishing and wading may be permitted in the Park. The Plan should specifically address the continuing issues of water quality and sanitation. The Park must develop a planning mechanism for improving water quality throughout the Park and restoring the creek for fish health and viability, as well as public health. (rocr0611.000)

**Response:** During the general management planning process, no suggestions were made to alter the current management approach to whitewater recreation. Therefore, this activity would continue in a manner similar to its historical use regardless of the management alternative that was selected. As a result, there was no need to address management of canoeing and kayaking on Rock Creek in the general management plan. A statement to this effect was added to the "Alternatives or Actions Eliminated from Further Study" in the final general management.

## PURPOSE OF AND NEED FOR ACTION

Table 2 and the associated text in the final general management plan and environmental impact statement were changed to specifically include canoeing and kayaking as appropriate activities within 6 of the 12 management prescriptions that comprised the alternatives, including all of the management prescriptions for areas that include Rock Creek. As a result, canoeing and kayaking are identified as appropriate activities on Rock Creek within the park and parkway in all of the alternatives. Canoeing and kayaking also were added to the list of recreational opportunities in Rock Creek Park in the "Affected Environment" section.

The National Park Service already has a plan and program for improving water quality in Rock Creek and its drainage. The National Park Service joined the Chesapeake Bay Program in 1994 and since then has been an active participant in this regional partnership to protect and restore the Chesapeake Bay and the entire watershed. In large measure, this involves controlling pollution, including sewage overflows and urban runoff. The National Park Service Chesapeake Bay Program Office coordinates the actions of NPS entities throughout the region, including Rock Creek Park. In its implementation of the general management plan, Rock Creek Park will continue to work through existing structures and organizations to achieve water quality goals, including the Class A standard for primary contact recreation that are assigned to Rock Creek by the District of Columbia Water Resources Management Division.

**Representative Comment 3:** The Park General Management Plan will not be complete absent a comprehensive interpretive plan for the park. Going beyond the present locus of interpretation in a small section of the upper part of the Park, the interpretive plan should include a fuller assessment of the cultural and environmental programming and stewardship possibilities for the entire Park. This is essential for restoring and deepening lasting community engagement in supporting the life and future of the Park.

The plan should identify and work with community partners to assess and develop interpretive and stewardship programs for significant geological, ecological, and cultural sites throughout the park.

In addition to all of the sites within the main part of the Park, the plan should link the Park to sites of historic significance that are adjacent to or near the GMP study area, such as Montrose and Dumbarton Oaks Parks, the Mount Zion and Female Union Band Cemetery, Jackson Hill and the Holt House, Historic Adams Mill Road, the Pierce Park African American and Quaker burial grounds, the Calvert Street "toddle house," Meridian Hill Native American spiritual ground, and similar historic sites.

It is critical that the interpretive plan be integrated into the GMP, so that critical facilities, operations, stewardship, circulation, and funding questions are addressed in the context of interpretive needs and possibilities. In this way, every program in the Park will advance a broad-based, active, permanent constituency to stand up and help the park, such as those that help other major urban parks across the nation.

Finally, the comprehensive interpretive plan should develop options for working with community partners to develop interpretive programs and products and to advance permanent community-based park advocacy, partnership, and conservancy. (rocr0315.003)

**Response:** The National Park Service typically prepares an interpretive plan as soon as the general management plan for a park is completed. Such a plan will be prepared for Rock Creek Park after the record of decision for the general management plan has been finalized. The six additional staff positions for interpretation and education that are included with any of the action alternatives will allow the National Park Service to substantially expand interpretation beyond current locations and subjects. We appreciate these suggestions on what should be included in the plan.

**Representative Comment 4:** Recommendation: Develop a comprehensive plan to enhance habitat for birds (and other wildlife) which would include, at a minimum, removal of hazardous invasive plants (Burdock) and a start at removal of other invasives in areas most used by migratory birds, replanting of native species which provide food and shelter, protection of dead tree snags and appropriate timing and review of tree cutting, and identification and establishment of more no-mow areas in RCP. Coupled with this, the park must put into place rational and science-based oversight for management actions. (rocr3025.006)

**Response:** The final general management plan and environmental impact statement was modified to emphasize the importance of birds and birding and to include a commitment to protect and enhance habitat for birds. These changes included:

- Adding birding to the list of appropriate activities in 6 of the 12 management prescriptions that comprise the alternatives. These included the Administration/Operations Zone where vegetation management for other purposes inadvertently created high-value bird habitat. See table 2 and the associated text in the final general management plan.
- Modifying all of the action alternatives to include a commitment enhance the management of park habitats for birds, and identifying of some of the actions that could be taken to achieve this goal.
- Providing the locations of some of the park's important bird habitat areas in the "Affected Environment" section and adding a commitment in this section to ensure their conservation and enhancement, regardless of the alternative selected in the final general management plan.

Following approval of the final general management plan, the park's natural resource management plan will be updated to identify specific locations and measures for bird management, including habitat enhancement.

#### **Issue 6: Need for Exercise Is Ignored in the "Purpose and Need" Statement**

**Representative Comment 1:** Rock Creek Park was established in 1890 "for the benefit and enjoyment of the people of the United States." Describing options C and D as "recreation emphasis" and "recreation enhancement" captures the "enjoyment" purpose of the park's charter but ignores the benefit.

The American public is in increasing need of this exercise benefit. [Commenter cites statistics from sources such as the Centers for Disease Control, the surgeon general's 2001 *Call to Action to Prevent and Decrease Overweight and Obesity*, and Dr. George Blackburn of Harvard Medical School on increasing obesity and its adverse effects on Americans' health.]

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The Park Service should choose the option that will most benefit the American public. That option is the one which goes farthest in arresting what the nation's premier health advisor tells us is a growing epidemic. While furthering recreation options is consistent with the park's purpose, it is maximizing exercise options that are our greatest national need. (rocr2752.002)

**Response:** Rock Creek Park serves a beneficial function by providing visitors with opportunities for exercise. However, a mandate to provide exercise is not included in any of the laws, executive orders, agency regulations, or other policies that guide NPS management of Rock Creek Park.

### **Issue 7: Justification for the Plan**

**Representative Comment 1:** I take issue with the statement in the draft that says there's a need or purpose. I think Congress has defined that purpose for you, and it has worked very well for the people, not only of Washington, but those visitors who come to Washington and who enjoy what we have here. (rocr3109.002)

**Response:** Comment noted.

**Representative Comment 2:** Repeatedly in public statements and in the draft plan, the needs of commuter cyclists and school groups have been mentioned as necessitating closure. If cyclists were indeed using Beach Drive to commute, then the proposed 6-hour closure would, at best, only provide benefit for one leg of their trip, and then only if they work a flexible schedule.

AAA studies show that rush hour extends well beyond 9:00 a.m. in the Washington region.

As for school groups, what benefit is gained by walking on a road that couldn't be better accomplished through a connected series of paths adjacent to the creek? (rocr0309.005)

**Response:** Bicycle users in Rock Creek Park include recreational bicyclists and bicycle commuters. Management strategies of the National Park Service include encouraging and enhancing recreational use of bicycles in the park, along with many other recreational uses. Bicycle commuters are treated in the general management plan as a component of traffic, just like automobile commuters.

A search of the document did not identify any instances where the needs of bicycle commuters were cited as a justification for components of any of the alternatives. The general management plan and environmental impact statement addresses commuting by bicycle in relation to impacts of the alternatives, just as it considers commuting by automobile.

Some of the alternatives that promote recreational use of bicycles may inadvertently result in beneficial effects on bicycle commuting. They may also help implement city or regional goals or plans for connected bikeways and for encouraging the use of alternate modes of transportation. However, the intent of the National Park Service is not to encourage or discourage commuting by bicycle any more than the National Park Service intends to encourage or discourage commuting by automobile.

Rush hour was based on when the U.S. Park Police put up and take down the traffic management barriers on the Rock Creek and Potomac Parkway. It does not correspond with the "rush hour" defined by AAA or any local traffic management agencies.

"A connected series of paths adjacent to the creek" would have substantial environmental effects on streamside habitat and would pave over the very resource that school groups would want to be studying. Streamside paths were not included in any of the alternatives.

School groups and other mid-day visitors could better enjoy activities in the park, including those near the creek, when they do not have to be concerned about the hazards and noise associated with traffic on Beach Drive. While school groups studying nature probably would not be using the road surface, many other mid-day visitors during this period, such as skateboarders, visitors with impaired mobility, the elderly, and mothers with children in strollers would enjoy the hard, smooth surface of the roadway without the presence of traffic.

### **Issue 8: Provide Better Summary Information**

**Representative Comment 1:** I think it would be very helpful if there was a chart at the beginning of the document that identified which NPS goals were being addressed and then listed the action items that would achieve each goal. The chart would then be the plan. Otherwise, the reader loses his way through the vast amount of information in the document. (rocr2935.001)

**Response:** Eighteen pages of NPS goals were listed, many in tabular (chart) format, at the beginning of the draft general management plan, starting on page 10. An attempt to consolidate these goals into a single chart would require abbreviating them to the extent that their meaning would no longer be clear.

Some difficulty stems from the fact that the draft general management plan actually contains four complete plans, expressed as the four management alternatives. The action alternatives would meet all of the goals identified on pages 10 through 28 of the draft plan, and the alternative to continue current management would meet most of the goals.

The description of each alternative included a brief concept that identified the goals of that alternative and broadly defined the actions that would implement that alternative. Table 6 in the draft general management plan lists the action items that would achieve each alternative's goals, just as the comment suggests.

The 26-page summary of the draft general management plan was organized to correspond with the complete document. The intent was to help guide readers who are not familiar with the standard organization of an environmental impact statement through the document's contents. They could then look at the corresponding section of the full plan to obtain more detail. A similar summary document will be provided for the final general management plan and environmental impact statement.

### **Issue 9: Lack of Creativity, Inspiration, Innovation, and Energy**

**Representative Comment 1:** I want to speak about what is not in the plan. The plan is not creative, inspirational, innovative or energetic. It does not create excitement about the wonderful re-

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source that Rock Creek is on a local, regional or national level. It does not really spark an interest that will draw congressional funding, many partnerships to it. At the same time, it does not stress the urgency of the threat, many of which we are familiar with.

We need to talk about how we're going to seriously manage change. It's more than just complying with your national requirements of the National Park Service. It's time for us to really look at how we can get ahead of that. I'd like to see something very innovative that looks at the best practices of today, the innovations of tomorrow and how we can really create a national showcase for the park, which is right here in the Nation's capital.

The interpretation recommendations in the guide are very lacking. There is no analysis to back them up. I think that partnerships is an issue that must be addressed. There is some initial work underway, but there's a much greater potential and a much greater opportunity to bring new energy, new people, new resources and new funding to the park to help you with your programs.

I think the plan should showcase the very best practices that you know of in resource management, in sustainability, in the marriage of development with natural resource conservation. I don't see that in the plan and we'd really like to see more of that. I'm hoping that these ideas of creativity and innovation will be developed in the final plan, and it will be an inspirational map for all of us. (rocr3093.000)

**Response:** Comments noted.

## GEOGRAPHIC AREA COVERED BY THE GENERAL MANAGEMENT PLAN

### Issue 1: Additional Areas Should Have Been Included

**Response:** Responses to specific concerns raised in comments are provided below. No changes in the geographic area of coverage will be made in the final general management plan.

**Representative Comment 1:** The Draft GMP/EIS excludes from analysis any impacts north of the Maryland state line. (rocr2994.007)

**Response:** The draft general management plan and environmental impact statement identified the geographic areas that are subject to management by the National Park Service under this plan. The recreation area north of Rock Creek Park is a Montgomery County park and is not under the jurisdiction of the National Park Service. Rock Creek Park and the Rock Creek and Potomac Parkway are within the District of Columbia, and the areas north of the Maryland state line are outside the plan area.

For many of the impact topics, the *analysis of impacts* extended beyond the boundaries of Rock Creek Park and the Rock Creek and Potomac Parkway. For impact topics such as air quality, regional and local transportation, and community character, a regional approach was taken, with analysis areas that extended into Maryland. The area included in each analysis is stated in the "Methodology" description at the beginning of each impact topic in the "Environmental Consequences" section. A clarifying statement to this effect was added to the final general management plan.

**Representative Comment 2:** We find the Draft GMP to be deficient in substantive ways that threaten its credibility. The GMP excludes properties of the Rock Creek Park administrative unit (such as the Tennis Stadium, Carter Barron Amphitheater, Dumbarton Oaks and Montrose Park), that are directly adjacent to the park and should have been included in the GMP. (rocr3030.004)

**Response:** Management of the Carter Barron Amphitheater and Tennis Stadium area was covered in an earlier plan and environmental impact statement. The citation for this document was included on page 293 of the draft plan. Because this document was incorporated by reference, these areas were not re-addressed in the current planning effort.

As described on pages 9 and 10 of the draft general management plan and environmental impact statement, Rock Creek Park includes 99 separate areas, known as reservations, with widely varying management needs. Sites that were not contiguous with the main park were not included in this document because of their specific management and design needs related to their special historic value and/or because their public uses are different from those of Rock Creek Park. Management planning for these areas will be conducted separately from the general management plan for Rock Creek Park.

Site-specific planning already is underway for the Dumbarton Oaks and Montrose Valley areas, which precludes the need to address them in the general management plan. This includes the completion of cultural landscape reports for both areas.

**Representative Comment 3:** Any GMP needs to explore fully Soapstone Valley Park (SVP). It extends from east of Connecticut Avenue (with accessibility to bus lines, Metrorail, large apartment houses) to west of Broad Branch Road. SVP has limited trails. Parcel of D.C. owned land interrupts NPS ownership. Planning might consider new, safe access to RCP by footbridge or easement. (rocr2988.001)

**Response:** On page 9 of the draft plan, Soapstone Valley Park was listed as an area that is included in the geographic area covered by the general management plan. The actions this commenter has identified for this area are too specific to be addressed at the general management plan level.

## PLANNING DIRECTION OR GUIDANCE

### Issue 1: Text Should be Corrected

From the Page 19 - Replace “Support initiatives by the U.S. Environmental Protection Agency, State of Maryland, and local governments, including the District of Columbia and Montgomery County, that ...” by “Support initiatives by the U.S. Environmental Protection Agency, State of Maryland, the District of Columbia, and local governments, including Montgomery County, that ...” (rocr1736.008)

**Response:** This change was made in the final general management plan.

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### **Issue 2: Park Roadways Are for Driving**

**Representative Comment 1:** Congress said the roadways must be used for driving. That is pretty clear. That does not mean jogging or biking. (rocr2769.015)

**Representative Comment 2:** Nonmotorized traffic has a place -- the bridle paths and picnic areas were built to provide for it. The roads that were built inside the park were, obviously, not meant for pedestrian and bicycle traffic. They were built for vehicular traffic, and have since become a major artery in a growing city. (rocr1516.003)

**Representative Comment 3:** NPS recognizes that driving by car in the Park is a traditional and fundamental park purpose, but its preferred alternative eliminates this use during the day, every day, at times when Park visitors (not through commuters) are most likely to drive through the Park for pleasure or to visit Park areas.

The proposed alternative also directly and seriously undercuts the legislated purpose of connecting the north and south parts of the Park with the Zoo (rocr2994.006).

**Response:** In the final general management plan, the National Park Service has changed its preferred alternative to Alternative A. This alternative would reduce traffic speeds, but road closures would not be a primary component of the plan to control traffic in the park.

Alternative D, which was the NPS' preferred alternative in the draft, would not eliminate most of the driving by car in the park at any time or on any day. It would restrict use of automobiles on three segments of one park road for six hours on work days. All other park roads would continue to be open to automobile traffic at all times throughout the day, every day of the year. This would provide a balanced approach to meeting the needs of the many segments of the public who use the park for recreation, including recreational driving.

The 1890 and 1913 acts that respectively authorized Rock Creek Park and the Rock Creek and Potomac Parkway are included in Appendix A of the draft general management plan and environmental impact statement.

- The 1890 act does not mention the zoo (which was not founded until 1889). With regard to transportation, park managers were instructed to "lay out and prepare roadways" without specifying what they were supposed to connect or the types of vehicles they were supposed to accommodate.
- The 1913 act authorized the United States to acquire the lands to be used for the Rock Creek and Potomac Parkway "for the purpose of . . . connecting Potomac Park with the Zoological Park and Rock Creek Park." It does not specify any connections north of the zoo.

The connection between the north and south parts of the park via automobile would be maintained under any of the management alternatives in the draft general management plan. During closure of the three Beach Drive segments, automobiles could be routed onto a clearly marked alternate route involving Oregon Avenue, Glover Road, and Ross Drive.

The main entrance to the zoo is on Connecticut Avenue, not Beach Drive or the Rock Creek and Potomac Parkway. The basic ability to get to the zoo would not be affected by any of the alternatives.

### **Issue 3: No Mandate for Automobiles**

These comments pointed out that automobiles did not exist when the park was established and there is no mandate for automobile use on Beach Drive.

**Representative Comment 1:** The roads for “driving” referred to in the 1890 statute were for the driving of horse-drawn carriages, not automobiles. There were virtually no automobiles in the area until some years later. Congress was indicating that it wanted to allow access both for horse-drawn carriages and for horseback riders. Carriages required “roads” as opposed to bridle paths. Certainly Congress in 1890 didn’t intend Rock Creek Park to be used a commuter route to the Maryland suburbs or a shortcut for residents in Chevy Chase to reach doctors on 16th Street. (rocr2923.006)

**Representative Comment 2:** Automobile touring was not specified as a use for the park in its establishing legislation of 1890 (before automobiles were available). There is no mandate that automobile touring be provided for in Rock Creek Park, and in fact such access could be replaced by a well-run system of public transit, pedestrian and bicycle access. (rocr0332.005)

**Response:** The park’s establishing legislation was passed on September 27, 1890. At that time, the automobile was in its early infancy. Internet sites document steam-powered vehicles as early as 1771, but most sources attribute the modern automobile to patents filed in Germany by Gottlieb Daimler and Karl Benz in 1886 and a vehicle build by Daimler and Wilhelm Maybach in Germany in 1889. Sources include

- [www.ideafinder.com/history/inventions/story054.htm](http://www.ideafinder.com/history/inventions/story054.htm);
- [yahooligans.yahoo.com/content/ask\\_earl/20020501.html](http://yahooligans.yahoo.com/content/ask_earl/20020501.html); and
- [corporate.britannica.com/press/inventions.html](http://corporate.britannica.com/press/inventions.html).

In the park’s 1890 establishing legislation, Congress instructed park managers “to lay out and prepare roadways and bridle paths, to be used for driving and for horseback riding.” Based on the date, it is clear that, as the comment points out, that the phrase “for driving” referred to driving a horse and carriage. However, there was no stipulation that the roads in the park were to be available exclusively for recreational purposes.

Subsequently, Congress authorized construction of the Rock Creek and Potomac Parkway (1913) and installation of the zoo tunnel (1966). These actions expressed Congress’ intent to provide automobile access to the National Zoo. These past decisions by Congress resulted in the current use of all park roads for nonrecreational purposes as well as providing visitors with access to the park. The purpose of this plan is to provide balance in the current uses of park roads.

**Representative Comment 3:** The statement on p. 65 of the draft GMP that “automobile touring along the length of Beach Drive...was one of the original purposes of the park” is incorrect. Rock

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Creek park was established in 1890, a time when an internal combustion engine for automobiles had not yet been invented. Moreover, it was not until the tunnel was cut near the National Zoo that it became possible to drive all the way through the Park. (rocr1726.005)

**Response:** The text has been corrected.

**Representative Comment 4:** As an urban wilderness area which has evolved over the years into a major automobile commuter route, Rock Creek Park is being overrun by cars whose presence in the park has nothing to do with its original purpose as a recreation area and wilderness preserve. (rocr0332.003)

**Response:** Based on its location in the center of Washington, D.C. Rock Creek Park cannot reasonably be characterized by the terms “urban wilderness area” or “wilderness preserve.” Moreover, Congress did not identify wilderness preservation among its original purposes. The park’s establishing legislation (included in Appendix A of the draft general management plan) stated that the land should “be perpetually dedicated and set apart as a public park or pleasure ground for the benefit and enjoyment of the people of the United States.” While it stated that “regulations shall provide for the preservation from injury or spoliation of all timber, animals, or curiosities within said park, and their retention in their natural condition as nearly as possible,” it also directed park managers to “lay out and prepare roadways.” The latter directive is inconsistent with the concept of wilderness either as it was understood when the park was established in 1890 or as defined in the Wilderness Act (Public Law 88-577) in 1964.

As described on pages 59 and 60 of the draft general management plan, an “urban wilderness” scenario was among the preliminary alternatives developed for Rock Creek Park. However, this approach received almost no support and widespread opposition from members of the public who participated in these planning activities and was eliminated from further consideration.

### **Issue 4: Bicycling Use**

**Representative Comment 1:** The National Park Service also argues that closing Beach Drive is necessary because this route is the “most level and direct route through the park.” (page 35) The National Park Service does not have any obligation to provide the “most level and direct route through the park.” Besides, the bikers that will utilize Beach Drive when closed are supposedly just recreating. (rocr0764.006)

**Representative Comment 2:** Another deficiency is that the plan acknowledges its model cannot accurately predict shifts in transportation modes. This shortcoming casts doubts on NPS’ dubious assertion that road closure will result in a surge in cyclist commuting. (rocr3040.007)

**Representative Comment 3:** The GMP is wrong in assuming that closing the gorge area to automobile traffic during non-rush hours will encourage commuting by bicycle. Because the closings are occurring during non-rush hours, they cannot – by definition -- encourage commuting to work by bicycle. (rocr0372.008)

**Response:** The National Park Service is not attempting to encourage commuting by bicycle. The intent of the proposed actions is to make the area safe and attractive for a wide range of recreation uses.

### **Issue 5: Other Compliance with Establishing Legislation**

**Representative Comment 1:** The Park Service misconstrues its mandate in considering issues surrounding the use of these roads, particularly their use by commuters. While the statute creating Rock Creek National Park called for a scenic road in the Park, neither that statute, nor any other, instructs that the Park Service allow the Park to be used as a major commuter thoroughfare in the City. In addition, in determining the appropriate management strategy for the Park, it is not the Park Service's role to address impacts on the surrounding community. Thus, for example, the Park Service cannot base its decision to continue to allow commuting through the Park on the ground that closing the roads will increase traffic on surrounding roads. The Park Service's mandate is to protect the Park, and to make its management decisions based on the maximum protection for the Park. (rocr2751.003)

**Response:** Comment noted.

**Representative Comment 2:** Traditional park use has not followed the legislation and has been directed toward local use, and has not protected the resources. Traditional use filled in most of the timbered wetlands and floodplains for picnic areas so they cannot function effectively in slowing the velocity of flood waters. Traditional use also cut considerable timber to construct and perpetuate a golf course. How does that preserve the timber and accompanying animals from "injury and spoliation" that was directed in the 1890 Act that established Rock Creek Park? (rocr3018.002)

**Response:** As stated on page 139 of the draft general management plan and environmental impact statement, the golf course was built at the site of a former arboretum, which was removed in 1920. Converting this already developed area to a golf course did not require cutting of the park's timber.

Initially, Rock Creek Park was managed by the U.S. Army Corps of Engineers. It subsequently was transferred to the Office of Public Buildings and Parks. During this time, many of the developed areas of the park were established, including its road system and the golf course. Administration of the park was not transferred to the National Park Service until 1933. Since then, the National Park Service has managed Rock Creek Park consistent with its mandate "to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (16 *United States Code* 1).

The National Park Service has not filled in any wetlands or floodplains to create picnic areas. To our knowledge, the agencies that managed the park prior to the National Park Service also did not implement these types of actions.

### **Representative Comment 3**

The proposed alternative also directly and seriously undercuts the legislated purpose of connecting the north and south parts of the Park with the Zoo. (rocr2994.006)

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**Response:** The 1890 and 1913 acts that respectively authorized Rock Creek Park and the Rock Creek and Potomac Parkway are included in Appendix A of the draft general management plan and environmental impact statement.

- The 1890 act does not mention the zoo (which was not founded until 1889). With regard to transportation, park managers were instructed to “lay out and prepare roadways and bridle paths . . . and footways” without specifying what they were supposed to connect.
- The 1913 act authorized the United States to acquire the lands to be used for the Rock Creek and Potomac Parkway “for the purpose of . . . connecting Potomac Park with the Zoological Park and Rock Creek Park.” It does not include “the legislated purpose of connecting the north and south parts of the Park with the Zoo.”

The connection between the north and south parts of the park via automobile would be maintained under any of the management alternatives in the draft general management plan. The main entrance to the zoo is not on Beach Drive or the Rock Creek and Potomac Parkway, so the ability to get to the zoo would not be affected by the alternatives.

### **Issue 6: Compliance with the Organic Act**

**Representative Comment 1:** The mission of the National Park Service as stated in the Organic Act is often quoted, but that is only part of the sentence. The part that is seldom seen by the public or the Park Service is the first part of the sentence which says that the Service is to regulate the use to conform to the fundamental purpose and to promote the use to conform to the fundamental purpose. It is not the other way around. One does not determine use and then preserve what is left, if anything, for future generations. Congress has had to remind the National Park Service on several occasions through the legislation that the resources come first, before use, not last. (rocr3018.001)

**Representative Comment 2:** NPS’ mission and statutory responsibility are to preserve and promote Rock Creek Park as a natural resource for this and future generations. NPS may have discretion to consider the impact of its decision-making on regional transportation needs, but the Park Service does not have authority to sacrifice the Park in order to reduce commuting time for residents of, say, Montgomery County. NPS is not responsible for fixing the metropolitan area’s traffic problems. (rocr2923.014)

**Response:** Comments noted.

### **Issue 7: Compliance with the National Environmental Policy Act**

**Representative Comment 1:** NPS appears to believe, and has publicly stated, that it can undertake the closure, for a trial one year period, and study the impacts later. That turns NEPA on its head and clearly violates the law. (rocr2994.013)

**Representative Comment 2:** Public suggestions by Park staff that the closure of Beach Drive would be a “trial period” allowing the study of impacts, is clearly contrary to NEPA. (rocr3028.007)

**Response:** The National Park Service has conformed with the National Environmental Policy Act by disclosing the effects of a variety of alternatives, ranging from continuing current management to permanently closing three segments of Beach Drive (Alternative C). Changes in the timing of closures are within the range of alternatives evaluated in the environmental impact statement.

**Representative Comment 3:** Do you know they violated NEPA by not performing a detailed statement when undertaking a major federal action that significantly impacts the quality of the human environment. The NPS did not perform one impact study on our neighborhood to determine if our public safety would be jeopardized by their plan. We feel this was done deliberately because they knew the results. (rocr1710.002)

**Response:** “Impacts on Public Health and Safety” was added as an impact topic in the final general management plan and environmental impact statement.

### **Issue 8: Compliance with the Americans with Disabilities Act**

More than 170 commenters expressed concerns about the effects of the alternatives on the ability of the public to access and use the park’s facilities. While few cited the Americans with Disabilities Act by name, many identified the “elderly,” “disabled,” “mobility impaired,” or “handicapped” as groups that would be affected. Comments indicated that the preferred alternative would have both adverse and beneficial effects on the NPS’ compliance with the Americans with Disabilities Act.

**Representative Comment 1:** Alternatives C & D also eliminate access to the best trail for the mobility impaired. While there is access to this trail from both ends when Beach Drive is closed, there is a steep hill at the south end (Blagden) and two small, but daunting enough hills at the north end (Joyce/Military Rd.) The only access to this wide level trail for the impaired is from the small roadside parking area by the Rapids Bridge. Daily closings would prevent this access. The only other suitable area is at the far north of the park, just past Wise Road, an additional 10-15 minutes drive from here. (rocr0935.006)

**Response:** Alternatives C and D were modified to recognize the importance of this parking area in providing impaired mobility visitors with the opportunity to enjoy an unpaved trail experience. The descriptions of these alternatives were changed to clarify that they would continue to allow visitors to drive slowly from Joyce Road to the Rapids Bridge parking area to gain access to this trail segment.

**Adverse Effect Representative Comment 1:** This closing effectively eliminates access by disabled citizens to the Park. Has anyone addressed the potential implications of the ADA? This is denying the pleasure of riding through the park to those who can't walk or bike in. (rocr0511.005)

**Adverse Effect Representative Comment 2:** A mid-weekday closure would create a burden for people whose limited mobility requires their use of vehicular access to the Park. The NPS should be acting in a manner that creates and does not restrict access to all people who might want to use Rock Creek Park. (rocr0384.003)

**Adverse Effect Representative Comment 3:** Alternatives which restrict car access to the park make the park only accessible to those who are able-bodied (can walk or bike). (rocr0770.002)

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**Beneficial Effect Representative Comment 1:** Rather than depriving the elderly and handicapped from accessing the Park, the proposed action will improve access for the elderly and handicapped by permitting them to use the only smooth surface in the valley without fear of traffic. (rocr3003.004)

**Beneficial Effect Representative Comment 2:** Nearly all picnic and parking areas would remain car-accessible during the closure periods. Persons who are mobility impaired and cannot navigate the dirt trails in the northern DC section of the Park would have much to gain under Alternative D because Beach Drive could be used for access to such attractions as Boulder Bridge and the gorge south of Wise Road, which are otherwise not easily accessible by wheelchair. (rocr2923.009)

**Beneficial Effect Representative Comment 3:** My experience with the section of the Park between Joyce and Broad Branch is that closing this section to cars would enhance accessibility for visitors using wheelchairs or walkers. It is difficult if not impossible to use a wheelchair or walker on trails. The smooth road surface is excellent for a wheelchair. During the week, when this section would be less heavily used than on the weekend, it would be an ideal spot for people using wheelchairs or those walking with the assistance of a walker or a cane to move at their own pace without fear of colliding with others moving much faster. (rocr1726.004)

**Response:** A description of the current conditions with regard to accessibility by people with impaired mobility was added to the “Affected Environment” section under the impact topic “Traditional Park Character and Visitor Experience.” In the “Environmental Consequences” section, the evaluation of this impact topic was expanded to include effects of each alternative on the ability of individuals with impaired mobility to access the park and its facilities.

### **Issue 9: Compliance with Federal and Local Department of Transportation Requirements**

**Comment 1:** Neither DC, nor the federal government, should want to do anything that could jeopardize our federal funding. Federal regulations at 23 CFR 1.9 says that federal aid funds cannot be used for any costs for projects that are undertaken in bad faith. Section 1.23 says that the rights of way shall be devoted for public highway purposes. If the Secretary of Transportation finds that any State has diverted transportation funds contrary to the law, he can reduce the federal aid apportionment. DOT regulations at 23 CFR 450.200 states that DC is required to carry out a comprehensive, city-wide transportation plan that facilitates the efficient, economic movement of people and goods in all areas of the state (in this case — DC). Dumping traffic onto Military Road and Blagden Avenue is inconsistent with that aim. Under Alternative D, where nine roads now serve, fewer than four would be carrying the slack. That is not in the public interest, especially for Ward 4. (rocr2769.011)

**Response:** *23 Code of Federal Regulations* 1.9 describes limitations on federal participation for costs that are “not incurred in conformity with applicable Federal and State law” as well as other regulations and/or “policies and procedures prescribed by the Administrator.” Federal transportation regulations, including those that guide the development of state transportation plans (the District of Columbia is treated as a state for federal transportation regulations), require that many factors be taken into consideration. The planning factors for the development of transportation plans include the following:

- Support the economic vitality of the United States, the states, and metropolitan areas, especially by enabling global competitiveness, productivity, and efficiency;
- Increase the safety and security of the transportation system for motorized and nonmotorized users;
- Increase the accessibility and mobility options available to people and for freight;
- Protect and enhance the environment, promote energy conservation, and improve quality of life;
- Enhance the integration and connectivity of the transportation system, across and between modes throughout the state, for people and freight;
- Promote efficient system management and operation; and
- Emphasize the preservation of the existing transportation system.

While alternatives for managing traffic in Rock Creek Park may have some impacts on congestion and would divert some traffic to District streets, they address several of these federal transportation planning factors, including the safety of non-motorized users, increasing mobility options for people, and improving quality of life. Actions that have the effect of increasing congestion do not necessarily run counter to federal transportation planning regulations; transportation planning always requires the balancing of competing needs and purposes. The environmental impact statement prepared in support of the general management plan quantify these trade-offs.

The *23 Code of Federal Regulations* 1.9 citation noted in this comment relates to the approval of previously incurred costs, and indicates that one of many conditions that would allow the participation of federal-aid funds for previously incurred costs is the good faith of the state highway department. The proposed action does not represent participation by the federal government of previously incurred costs. In addition, the District of Columbia Department of Transportation reviews and comments on the proposed action and its potential transportation impacts represent the good faith of this agency and the District government.

**Comment 2:** Let me mention that there is a Title VI requirement. The city is supposed to annually certify to the FHWA that its actions are in accordance with all applicable requirements. Before there could be a change in the function of Beach Drive, there would have to be concurrence from the Federal Highway Administrator, who, in turn would have to first determine that the change in use is in the public and interest and will not interfere with the free flow of traffic thereon. 23 CFR 123c and 23 CFR 470. 109(a). (rocr2769.012)

**Response:** The environmental impact statement was developed to assess the impacts of the proposed action on the public interest and its effects on the free flow of traffic. The public interest extends beyond the free-flow of traffic and includes impacts on quality of life, safety, and mobility by a wide range of modes (such as car, bicycle, and walking/hiking) and for a wide range of purposes (such as recreation, commuting, and personal travel). The federal transportation planning factors cited in the response to Comment 1, above, describe the wide range of factors that need to be considered in planning transportation improvements.

**Comment 3:** The alternatives considered in the management plan do not comply with the federal transportation mandates or policies. For example, the Federal Highway Administration regulations at 23 CFR Part 460.2(c) defines open to public travel to mean that the road section is avail-

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able and open and passable by four-wheel standard passenger cars, and open to the general public for use without restrictive gates, prohibitive signs, or regulation other than restrictions based on size, weight, or class of registration. (rocr2769.016)

**Response:** The citation from *Code of Federal Regulations* 460 defines how highway safety funds are apportioned. The definition in itself is not a regulation. As described in *Director's Order 87A: Park Roads and Parkways* and Section 9.2.1 of *Management Policies 2001*, the National Park Service has the authority to manage park roads in national parks throughout the country, which includes closing roads at certain times and for various reasons.

**Comment 4:** Rock Creek Park was dedicated as a park by an Act of Congress, which was approved by both houses of Congress and signed into law by President Benjamin Harrison on September 27, 1890. Section 7 of the 1890 Act delineated the duty for the layout and use of the public park that was authorized and established by this act. Congress specified the preparation of roadways to be used for driving, bridle paths for horseback riding and footways for pedestrians. US Code Annotated and DC Code Chapter 10-142 (Sept. 27, 1980, 26 Stat 495, Chapter 1002, Section 7: July 1, 1918, 1981 Ed., Section 8-142). Beach Drive was created in 1896 and was named for Captain Lansing Beach. In 1901, the District of Columbia recorded its permanent system of highways and incorporated these designations as part of a permanent highway plan within the DC Code. By law, all spaces on any duly recorded plat, designated as a street or road became a "public way", if it were recorded as such by 1902. The roads are a part of the District of Columbia's Permanent System of Highways. In addition, federal law requires the preservation of existing roads and that roads to be used for their public highway purposes. (rocr2769.017)

**Response:** As noted previously, the preservation of existing roads is one of many factors to be considered in transportation planning, but is not the only one. It should also be noted that while Beach Drive may historically have been recorded as part of the District of Columbia's Permanent System of Highways (this was not verified for this response), roads within Rock Creek Park, including Beach Drive, are not maintained or funded by the District of Columbia.

**Comment 5:** Any changes to the functional classification has to be submitted to the Federal Highway Administration (FHWA) for approval. Unless and until a change is approved, there is an official and permanent system of highways and roads. We are bound by that designation of the National Highway System. 23 CFR 470.105. Another FHWA regulation says the designation of any road routes has to be in accordance with the planning process that is required by law at 23 USC 135 and 23 USC 134(a). In terms of the environmental consideration, 23 CFR 771.106(b) says that alternative courses of action have to be evaluated and decisions made in the best overall public interest based upon a balanced consideration of the need for safe and efficient transportation; of the social, economic, and environmental impacts of the proposed transportation improvement, and of the national and local environmental protection goals. This does not strike the proper balance. Anything that adds to congestion is inconsistent with the air quality goals. Anything that impedes the flow of vehicles is inconsistent with our need for an effective, efficient transportation network. Anything that would take an historic road and put it to a different use than Congress intended is inconsistent with our values for access for all. Anything that would add more congestion to a city with the 2nd or 3rd worst congestion in the nation is not in the public interest. Anything that diverts traffic into residential communities is not safe or efficient. Further, the impact negative in terms of our businesses. Right now, our businesses are losing millions in lost revenue caused by clogged roads. We cannot afford to lose any more. Further, only those

projects, which have been shown to provide maximum utility and to be cost effective will be considered. In other words, the estimated cost of the project has to be shown to be consistent with the anticipated benefit to the community. 23 CFR 652.7(4). The communities are speaking. We note that according to the census, less than 3% bicycle. The cost of the project is twelve times higher than preserving the park as congress intended. Further, I suspect that the cost estimates for any changes are too low. Any new construction would have to be in substantial conformity with the latest official design criteria. 23 CFR 652.7(5). These historic roads, which predate the environmental laws, can be preserved to their historic proportions, but if you try to widen them, then you will incur additional cost. Plus, the network is set. It may take an act of Congress to change the roads in Rock Creek Park. (rocr2769.019 and .020)

**Response:** NPS roads are not under the jurisdiction of the Federal Highway Administration. However, the writer correctly indicates that alternative courses of action have to be evaluated based on a balanced consideration of safety and efficiency, as well as social, economic, and environmental impacts. The environmental impact statement describes the benefits and impacts of the four alternatives for managing the park and its roads.

**Comment 5:** The alternative uses do not comply with the MOU between the Department of Interior and the Department of Transportation which requires minimizing congestion, not adding to it. The Director's Order and other memoranda provide guidance. They do not comply with FHWA regulations, which require transportation efficiency and using the roads for public highway purposes and preserving the existing transportation infrastructure. (rocr2769.021)

**Response:** Preservation of the existing transportation system is only one of the many factors that are included in federal transportation planning regulations. Some of the many other factors that need to be considered based on federal transportation planning regulations are improving public safety and promoting multi-modal travel.

Modifying the carrying capacity of roadways to enhance safety, improve accessibility, and achieve other goals is an inherent part of transportation planning that is supported by federal planning regulations. Examples of such actions abound and include such measures as traffic calming through modifications to roadway design, adding or removing travel lanes through roadway narrowing or adding/removing parking lanes, and adjustments to traffic signal timing and phasing to enhance safety. Regulations and transportation planning practice require that the effects of these actions on traffic flow and safety be considered when making decisions on these actions, but such considerations do not prohibit the implementation of such actions when, on balance, the effects of such action are judged to be positive for the public health and welfare.

#### **Issue 10: Compliance with Home Rule**

**Comment 1:** Given the widespread opposition to closing Beach Drive, any attempt to do so by the Park Service would violate Home Rule. (rocr3035.023)

**Response:** Home rule in the District of Columbia involves a delegation of selected power from Congress to the District of Columbia. Because that delegation does not include control over federal facilities, management of park roads within Rock Creek Park has no effect on, and would not be affected by, home rule.

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### **Issue 11: Compliance with the Chesapeake Bay Program**

**Comment:** In rocr0949, the NPS Chesapeake Bay Program Office offered text describing the regulatory requirements that the National Park Service, including Rock Creek Park, must follow to implement this program and suggests that it could be incorporated into this section. Their page-specific comments are as follows:

Page 19: Consider modifying the 4th bullet point to read, "Promote greater public understanding of water resource issues in the park and encourage public support for and participation in improvements in the Rock Creek, Potomac River and Chesapeake Bay watersheds."

Page 43: In 3rd paragraph, consider incorporating language to provide more clarity on NPS commitments relative to the Chesapeake Bay Program.

Page 299: Correct the Index entry for Chesapeake Bay (also defacto covering Chesapeake Bay Program) by deleting pages 126, 276, 329. Chesapeake Bay Program is currently referenced on pages 19, 21, 43, 124, 272, and 319.

Page 313: Appendix B: Laws and Executive Orders: Add reference to the Estuaries and Clean Waters Act of 2000. (Title II-Chesapeake Bay Restoration mandates our compliance with Chesapeake Bay agreements.)

Page 319: Last paragraph, consider incorporating language to provide more clarity on NPS commitments relative to the Chesapeake Bay Program. (rocr0949)

**Response:** These changes were made in the final general management plan and environmental impact statement.

## **DECISION POINTS**

### **Issue 1: Decision Points Are Inadequate to Address the Range of Problems Faced by the Park**

**Representative Comment 1:** This GMP cannot afford to be a narrowly focused document. While it may surely cover topics of current special emphasis, such as use of the Park by vehicular traffic, it must also directly and comprehensively address many/most elements needing attention by Park management. Again, just as a point of emphasis, this document must cover planning needs for many years to come, not just the current 'crises'. At the very least the Park should plan to analyze its overall structure (logically based on GIS pegged information systems) to include the web of roads, trails and associated facilities to determine how the configuration of the Park might be better organized/ arranged so as to optimize areas for traffic movement, recreational use, wildlife habitat, social functions and natural area protection.

The current Park layout is too fragmented. The Park (in the Plan) cannot seem to be satisfied with its current level of resource management.

There are yet requirements for additional support to address such chronic issues as impacts from deer populations, control of invasive non-native species (flora and fauna), restoration of habitat

and wild areas, management of runoff and stream flows within and from outside the Park, re-establishment of a comprehensive system of vernal pools, expansion of old field succession areas, identification and provision of broad areas to permit use by some forest interior dwelling species, etc. All these kinds of things cry for attention and critical new, additional support by the Park for planned management of its resources. Considerably more effort is needed to fulfill the gaps identified in the Park Resource Management Plan. It is just not sufficient to casually mention enhancement of natural resources without including a firm set of specific goals. (rocr0749.001)

**Response:** With regard to the overall structure of the park, most park components, including its roads and trails, are historic elements. Much of the park road system was designed as part of the park at the turn of the 20th century, but other road components date from earlier periods when they served farms in the area. Collectively, the park and its features, including the roads and trails, create a cultural landscape of significance. From a cultural resource perspective, locations of roads and other features within the park could not be changed without losing their historic integrity.

The trail plan that will be prepared following approval of the final general management plan will address optimizing the trail configuration. Although some trail segments that are in sensitive habitats, are poorly designed, or are on steep slopes may be relocated, there will not be a major realignment of the trail network.

The National Park Service already has an effective geographical information system (GIS) that it uses as a tool for management of all Rock Creek Park facilities and infrastructure. Management of invasive species, roads and trails, deer, bird habitats, wetlands, and other resources will continue to be integrated within the geographical information system to provide resource managers with spatially linked data.

Regarding “gaps identified in the Park Resource Management Plan,” while goals such as enhancing natural resources are not laid out in depth, the commitment to meet those goals is by no means casual. Identification of these goals in the general management plan initiates a series of activities, including establishment of specific objectives, definition of actions to implement those objectives, and development of budgets and schedules with milestones against which progress can be tracked. These are integrated into the park’s 5-year strategic plans, annual performance plans, and implementation plans and are regularly monitored to ensure that adequate progress is occurring.

After the general management plan is completed, the National Park Service will update the park's natural resource management plan. This plan will address deer, invasive plant species, habitat protection and restoration, and many other items. The natural resource management plan will include specific goals for resource management and identify how those goals will be achieved. As appropriate, more detailed plans may be prepared to address particularly difficult problems.

## **Issue 2: Decision Points Are Inappropriately Focused**

**Representative Comment 1:** Traffic should be identified as a problem in protecting the resources of the park and not as a function of the park. It is wrong to say that the park is a part of the regional/urban traffic grid. This locks the park into traffic forever and hamstring future managers to do anything about it. (rocr2981.002)

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**Response:** Throughout the general management plan, there is clear differentiation between the park road network and the surrounding city street grid. The document repeatedly states that the National Park Service has no mandate for facilitating the flow of traffic in the Washington, D.C. area. The consideration of Alternative C, which would permanently close three segments of Beach Drive to automobile traffic, shows the willingness of the National Park Service to consider the entire range of approaches to traffic management. Just because this alternative was not selected now does not mean that it (or other traffic control approaches) cannot be reconsidered in 20 years when the general management plan is updated.

**Representative Comment 2:** It seems that the US Park Service may have formulated its study to support an agenda that is not in the public interest. A study which has the appearance of supporting preconceived alternatives, rather than addressing regional environmental and safety issues. Why are the only alternatives considered ones which either expand exclusive use of public lands for the few elitist hikers and bikers, or maintains existing access for that group? Why does no study ever consider ways to improve the flow of traffic, increase public safety, and consider more than a constrained and inappropriately narrow environmental impact? (rocr0711.004)

**Response:** Alternatives were developed based on scoping and include a complete range of alternatives from continuing current management practices to permanent closure of three segments of Beach Drive.

### Issue 3: Natural Resources Should Be a Decision Point

**Representative Comment 1:** The first decision point is phrased in such a way that natural resources are completely missing from the question. I would suggest that the first question should be, "To what extent can we allow automobile traffic in the park without damaging the natural and cultural resources of the park?" It is dangerous precedent and a contradiction of park mandates to state that park roads are part of the regional traffic grid. It seems to me that having Beach Dr. "inadvertently" become a major commuter corridor by the opening of the Zoo tunnel does not justify allowing that to continue, given the purpose of the park. (rocr2980.002)

**Representative Comment 2:** Natural resources should be a key management concern since it has been identified in park and NPS legislation for protection from changes. Natural resources should be a decision point and considered right along with traffic, visitor services, and administration/operation functions. (rocr2981.012)

**Response:** The preferred approaches for the management of natural resources were relatively evident during the planning process. Because there was consensus that improvements were needed and general concurrence on what these improvements should include, there was no decision to be made and no decision point. The same approaches for improving management of natural resources were included in all of the action alternatives, while the no action alternative considered effects if these approaches were not implemented.

### Issue 4: There Was Inadequate Analysis of Decision Points

**Representative Comment 1:** The decision points (page 5) nicely lay out some basic management issues facing the park. However, there is no subsequent analysis of these issues, and no data

are presented. The alternatives laid out mix the issues together, without discussion. That 9000 cars use the park, for example, tells us nothing. When and where does this traffic occur? How would each of the proposed alternatives resolve the problems? (rocr2958.006)

**Response:** The reference to page 5 suggests the commenter may have seen only the 26-page summary of the 348-page-long draft general management plan and environmental impact statement. (The decision points are established on pages 28 through 31 of the full plan.) The summary could only briefly identify highlights of the detailed analyses included in the complete document. For answers to the concerns identified in this comment, readers are referred to the actual general management plan and environmental impact statement, which is available at the park, at public libraries throughout Washington, D.C., and on the Internet.

## **ALTERNATIVES OR ACTIONS ELIMINATED FROM FURTHER CONSIDERATION**

### **Issue 1: Construct a Continuous Paved Recreation Trail in Rock Creek Valley**

**Representative Comment 1:** The Draft GMP/EIS is inadequate because it fails to seriously study the idea of completing a paved recreation trail throughout the areas proposed for closure, one option that would satisfy both residents and bicyclists. (rocr2994.012)

**Representative Comment 2:** We regret that what we believe is the best alternative is not presented in the draft management plan. That is a “paved recreation trail parallel to Beach Drive through the entire length of Rock Creek Park.” That is dismissed on page 34 in little more than a single page of this 348 page draft management report. And it is rejected on account of, and I quote from page 34, “Environmental obstacles that would be difficult and expensive to mitigate.” That means it’s been rejected on account of money. The candidate has been ruled off the ballot because we can’t afford it, and I think that’s unfortunate. I think it should be back on. (rocr3097.001)

**Representative Comment 3:** The Park Service should revisit its determination that a continuous trail separate from Beach Drive cannot feasibly be constructed and that “the only way to provide a continuous recreational trail through the [upper] valley would be to permanently close sections of Beach Drive to automobiles” (p. 29). The Park Service itself in 1980 recommended the construction of this trail, but now concludes that while it is possible, it would be “extremely difficult and expensive to mitigate” the impacts (p. 29).

I believe that with careful construction and judicious management, such a trail could be instituted, which would then allow removal of bicycle traffic from Beach Drive while affording safe and convenient bicycle commuting and recreational use through the upper valley. In particular, I would recommend that the Park Service develop an engineering design of such a trail in order to assess its cost and impacts. Such a design should make every feasible effort to mitigate adverse impacts on endangered species habitat, wetlands and National Register properties. (rocr2850.002)

**Representative Comment 4:** I would welcome the opportunity to work with you and others at the National Park Service to seriously pursue the idea of completing a hiker-biker trail through the areas proposed for closure. That option would satisfy the needs of all the users of the park and address the concerns of the adjacent communities. Your analysis dismisses that option and ques-

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tions whether “user numbers and use patterns would justify the construction of a paved recreation trail” given that weekday usage is “relatively low” and that “most recreation needs are already being met by the weekend road closures in these areas.” Those observations also undercut the rationale for your proposal to close the road to motorized traffic during those hours. Further, a 1990 NPS study recommended completion of the Rock Creek bike path, as one of its highest priorities. In addition, this option would clearly serve the needs of recreational and commuting cyclists, without impeding automobile traffic or diverting that traffic onto neighborhood roads. Given those things, NPS should not be deterred from further considering it, just because the option is “difficult” and “expensive.” Your analysis fails to consider the benefits to be obtained by allowing all day use of an all day bike trail, so that cyclists could use it during rush hours when it would be in the greatest demand, not just during the mid-day period. (U.S. Representative Chris Van Hollen, rocr2994.005)

**Representative Comment 5:** I am a strong proponent of bicycling and alternative transportation options and have worked very hard to establish and expand federal programs to help develop bicycle and pedestrian trails throughout this region and the nation. Indeed, I am leading an effort in the Congress to establish a new federal grant program to support the development of alternative transportation services for our national parks, wildlife refuges and other public lands. Known as the Transit in Parks Act or TRIP, the legislation would provide \$90 million a year in capital funds for transit projects, including rail or clean fuel bus projects, pedestrian and bike paths, or park waterway access, within or adjacent to national parks and other public lands. I would be pleased to work with you, the Washington Area Bicyclist Association, and other organizations to explore options for enhancing hiker-biker trails in Rock Creek Park and the greater Washington metropolitan area. (Senator Paul Sarbanes, rocr2862.001)

**Response:** The 1980 and 1990 studies that recommended constructing a continuous paved recreation trail through the valley were not supported by any actual data on the practicality of such an action. Early in the general management planning effort, field investigations were conducted by NPS landscape architects, natural resource specialists, and civil engineers; representatives of the U.S. Fish and Wildlife Service; and the District of Columbia State Historic Preservation Officer. The investigations determined that there are multiple, severe impediments to trail construction along Beach Drive north of picnic grove 10 and in the area between Joyce Road and Broad Branch Road.

Bicycles are classified as vehicles and are legally entitled to use public streets (District of Columbia Code of Municipal Regulations, Title 18, Chapter 12, 1200.3). As a result, a trail through the valley would not necessarily separate recreationists from motorized vehicles or move bicycles out of the traffic stream, because bicyclists may choose to use the roadway rather than a paved trail.

Based on physical, cultural resource, and biological resource considerations, construction of a continuous, paved trail in the Rock Creek valley was judged to be impractical. Therefore, it was eliminated from consideration as a component of any of the alternatives in the general management plan.

This conclusion could be reevaluated in the future during, for example, preparation of the trail plan for Rock Creek Park. If needed, an amendment to the general management plan would be prepared to accommodate the change in park management.

**Issue 2: Relocate the Park Police Substation to the Carter Barron Area**

**Representative Comment 1:** Relocation of the Beach Drive-Joyce Rd. Park Police substation should be in the Carter Barron area. It should be welcome for neighbors of a crime area. Cutting down trees for a new police station or moving it out of the park would be a ridiculous disservice to the park. Previous non-consideration of Carter Barron does not prohibit current consideration for the police station. (rocr3026.004)

**Response:** The area near the Carter Barron Amphitheater was not considered for the police substation in the draft general management plan because, when the planning process began in the late 1990s, there was opposition to use of this site by the local neighborhood. Moreover, the management plan for this area that was published in 1995 did not include a substation. A discussion of this situation was included on page 35 of the draft general management plan.

In the final general management plan, the preferred approach will continue to be to locate the police substation in commercial space outside the park. However, the final plan will not identify a preferred location in the park for the police substation if suitable commercial space cannot be found. Before the substation was relocated to another site in the park, the National Park Service would conduct a siting study, including a National Environmental Policy Act analysis, to determine potential impacts and identify the optimal location for this facility.

**Issue 3: High-Occupancy Vehicle (HOV) Requirements Should Be Eliminated from Consideration**

**Representative Comment 1:** I think the HOV concept requires a separate lane to pull over a violating car to ticket that car. Since there is no space for this in the Park, there will be no enforcement, making HOV a useless concept. (rocr0741.003)

**Response:** HOV restrictions were removed from the preferred alternative in the final general management plan.

**CONNECTED, CUMULATIVE, OR SIMILAR ACTIONS**

**Issue 1: Include Other Actions**

**Comments:** Specific actions that comments said should be considered included:

- Effects of the Zoo Tunnel. (rocr0370.001)
- Proposals to rebuild Broad Branch Road. (rocr0372.005)
- Current reconstruction of 16th Street. (rocr0724.002)
- Continuing issues of water quality and sanitation. (rocr3022.002)
- The Chesapeake Bay Program and the NPS' obligations and opportunities relative to the bay program. (rocr0949.001)

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- Need to coordinate with Maryland, the need to coordinate on traffic patterns, and the need to coordinate on the other bike paths that have been completed and are being completed even now. (rocr3075.002)

**Response:** All of these suggestions were included, directly or as part of a larger group (such as “continuing efforts to improve transportation,” rather than “current reconstruction of 16th Street”) among the connected, cumulative, or similar actions that were considered to determine impacts resulting from the implementation of the alternatives.

## Issue 2: Include Other Organizations

**Comments:** Parties that were specifically identified in comments as having connected, cumulative, or similar actions that the NPS should be coordinating with included:

- COG, to get more parking at Metro stations and reduce the costs of commuting by Metro. (rocr0741.004)
- D.C. Department of Health, Water Quality Division, which coordinates with the National Park Service to resolve illicit discharges to Rock Creek and its tributaries. This agency should be added to the list of agencies on page 17 of the draft general management plan. (rocr1736.007)
- Regional transportation planners [who] must properly manage the region’s traffic without relying on Beach Drive as a crutch. We support sensible efforts to reduce traffic congestion through the city and the region by improving public transportation. (rocr2754.007)
- The National Zoo to find a way for the zoo tunnel bypass trail to remain open continuously for recreational users. (rocr2754.009)
- Federal Highway Administration and U.S. Department of Transportation. (rocr2769.011)
- The Maryland Departments of Natural Resources, State Police, Transportation, and the Environment; and the Maryland Department of Planning plans, programs, and objectives. (rocr2861.001)
- Montgomery County plans, programs, and objectives. (rocr2861.003)
- Local bird club experts [who] should be asked to lead bird walks or to give talks on birds to park visitors. (rocr3025.008)
- Other appropriate government agencies to assure people who live along the park that they will do all they can to minimize traffic on local roads by keeping traffic flowing, by supporting initiatives to increase public transportation and non-vehicular modes of transit. (rocr3104.002)
- Surrounding neighborhoods. (rocr3108.004)

- The Councils of D.C. and Montgomery County, the D.C. Department of Public Works and Maryland Department of Transportation. (rocr3115.003)

**Response:** The National Park Service coordinates with all of these entities, plus many others, on a regular or as-needed basis to achieve mutual goals. A statement to this effect was added to the final general management plan.

Some of the recommendations in these comments are too specific for the level of planning associated with a general management plan. However, they will be retained and incorporated into the plans that will tier from the general management plan, including a trail plan and interpretive plan and an update of the park's natural resources management plan.

### **Issue 3: Improve Planning for Water Resources Management**

**Representative Comment 1:** On the question of excess water, it seems to me that as part of the management plan there has to be a direction to allow the staff to figure out and work out the problems and the solutions to ask the cooperation of the nearby communities both in D.C. and upstream (rocr3135.001)

**Representative Comment 2:** The Plan should specifically address the continuing issues of water quality and sanitation. The Park must develop a planning mechanism for improving water quality throughout the Park and restoring the creek for fish health and viability, as well as public health. (rocr0611.002)

**Response:** Descriptions of ongoing actions to improve storm water management and address water quality and sanitation in the Rock Creek watershed were described in the draft general management plan and environmental impact statement, along with the NPS' previous experience and continuing commitment to work with other agencies to achieve common goals. Please see pages 16 through 19, 170, and 171 of the draft plan. These were updated in the final plan and supplemented with additional information, such as the NPS' participation in the Chesapeake Bay Program.

### **Issue 4: Prepare and Implement a Better Plan for Trails**

**Representative Comment 1:** I would suggest a better developed series of walkways and bike paths that draw visitors away from the roadways and into the park. (rocr0629.002)

**Response:** Trail improvements would be a major component of any of the action alternatives. In the draft general management plan, trail improvements were discussed under each of the multiple management prescription that comprised an alternative, and the entire trail program was difficult to perceive. A new section, "Summary of Trail Improvements" has been added in the final general management plan.

To implement the trail program, the National Park Service would prepare a trail plan that would tier from this general management plan. The assessment, routing, and conceptual design elements of the trail plan would allow the National Park Service to determine optimal trail alignments that would minimize impacts of trails and avoid conflicts among visitors. The study would outline the trail design and construction standards to be used and would include maps and costs for trail al-

## PURPOSE OF AND NEED FOR ACTION

ternatives. As part of this process, the National Park Service would provide National Environmental Policy Act documentation, which would include opportunities for agency and public review and comment.

### **Issue 5: Prepare and Implement Plant, Forest, and/or Bird Management Plans**

**Representative Comment 1:** [Regarding regional management of forests,] The conflict between commuters / developers and the environment doesn't have to be. We found, in a number of cities throughout the country, foresters and commuters/developers working hand in hand to assure both development and the preservation of trees and open spaces. (rocr1692.002)

**Representative Comment 2:** The Park needs additional expert staff and thoughtful long-range thinking to preserve bird habitat and monitor what is happening to Park birds. Birds are critical to maintaining the significance and character of the Park, one of the values stated in the Plan. Similarly there is a continued threat to the wild plants in the Park as well as invasion by exotic species. A long-range plan to address these concerns would guide budget decisions. (rocr3027.007)

**Representative Comment 3:** I would like to recommend that the Park Service use its own staff, which has considerable expertise, as well as employee experts from nearby agencies such as the Migratory Bird Specialists at the Patuxent National Wildlife Research Center to develop a comprehensive management plan for migratory and resident birds and their habitats in Rock Creek. And furthermore, to seek outside partners through the birding community to do such activities as remove invasive species and promote bird walks and so forth within the park. (rocr3105.006)

**Representative Comment 4:** I would like in the management plan a commitment to persist on management of invasive plant species. There are going to be some of the species that are very difficult to eradicate. The Plant Society pledges itself to be of any assistance that we can on this. (rocr3135.002)

**Response:** Consistent with *Management Policies 2001*, the National Park Service has policies for managing invasive plant species. These are included in the park's existing natural resources management plan and will be implemented with the management direction included in the general management plan.

Following approval of the final general management plan, the park's natural resources management plan will be updated. Additional data on the contents of the natural resources management plan, which will address all of the resources identified in these comments, were added to the final general management plan. The descriptions of the action alternatives in the final general management plan were modified to clarify the NPS' commitment to manage park areas for birds.

### **Issue 6: Prepare and Implement a Bike Plan**

**Representative Comment 1:** We need a bike route plan. It has to be from Wisconsin to Georgia, not just a plan inside the park. So you have to work together with city and regional planners from outside the NPS as to where those routes are needed, for instance, from American University to UDC, connecting bicycle trails from Metro stations on the west side of the park to the east side of the park. (rocr3064.002)

**Response:** The National Park Service participates in regional planning but is not the lead agency for these activities. The National Park Service will continue to work with planners throughout the region to support the development of coordinated plans to promote recreational bicycle use throughout multiple jurisdictions.

**Issue 7: Enhance Benefits from Partnerships, Advocacy Groups, and Other Affiliations**

**Representative Comment 1:** Create a Rock Creek Conservancy to bring private sector advocacy and funding to enhance limited federal resources in the protection, promotion and enjoyment of all the park units administered as part of Rock Creek Park;

Create a National Capital Region Citizens Park Advisory Committee appointed to reflect the range of national and local interests, and with geographic and demographic representation, which can provide an ongoing mechanism to review and advise on the management of all the national park units within Washington DC; (rocr3030.016)

**Representative Comment 2:** The National Park Service's General Management Plan seems to have caught the imagination of those wanting to drive through Rock Creek National Park at all hours of the weekday and those who want to preserve the roadway for recreational purposes between the rush hours. However, it seems to have awakened little attention to a) its potential as a teaching tool for DC students as well as for visitors of all ages, b) the need to bolster stormwater management, wildlife management, and natural resource management in general, c) its potential as part of a Heritage Trail connecting the Fort Circle Parks, and d) other such issues that are also important to the vitality and well-being of the city and environs. I would encourage NPS to give these issues more attention. (rocr0304.001)

**Representative Comment 3:** The GMP provides no guidance or direction for park management to use in developing partnerships with other governmental and non-governmental entities. To offset inadequate Federal resources, to encourage support for Rock Creek Park, and to increase involvement in its future, the Committee of 100 urges the establishment of a wide range of public-private partnerships. Such partnership have produced excellent results for many communities and national parks throughout the nation, such as Golden Gate National Recreation Area in San Francisco; Gateway NRA in New York City; and Cuyahoga Valley National Park between Akron and Cleveland, Ohio.

The Washington DC area offers a rich array of possible partnerships to benefit Rock Creek. These could include:

- a) Agencies. Partnerships with local (e.g., DC Parks and Recreation, Schools, DDOT), state (MD, VA), and federal agencies (EPA, USDA etc.) to share resources, outreach, communications, cross training, amid joint programs;
- b) Conservancy. Creation of a Rock Creek Conservancy to support fundraising, promotion, and partner programs for the park--see 9 (b) below;
- c) Advisory Committee. Establishment of a citizens advisory committee to advise on matters relating to all the national park units located within Washington, DC see 9 (c) below; and,

## PURPOSE OF AND NEED FOR ACTION

d) Universities and Schools. Cooperative agreements with local universities and schools for research, study, and support of park programs. (rocr3030.015)

**Response:** The list of current friends and partners of Rock Creek Park was added to the final general management plan under “Connected, Cumulative, and Similar Actions.” All of the alternatives will provide opportunities for partnerships, and the National Park Service will consider all offers for support, partnership, or coordination.

### **Issue 8: National Park Service Provided Inadequate Notification to Other Organizations**

**Representative Comment 1:** We feel that there was a complete disregard for the intergovernmental coordination process. The National Park Service didn’t notify Montgomery County’s Department of Transportation or the National Capital Park and Planning Commission of the draft management plan in order to receive their input. In April 2003, a concerned citizen made both of those entities aware of the draft plan. Informational sessions for these two government agencies were then finally provided by the National Park Service on May 13 and May 15. Hence, these agencies had no input into the plan that affects areas within their jurisdiction, property that is directly adjacent to Rock Creek Park. (rocr3042.001)

**Response:** In its initial April 2003 mailing, the National Park Service sent nine copies of the draft general management plan and environmental impact statement to Montgomery County agencies and two copies to the Maryland-National Capital Park and Planning Commission. The National Park Service also met with many elected representatives of Maryland citizens, including the area’s congressional representatives, and employees of numerous local and state agencies. These coordination activities included the May 13 and May 15, 2003 meetings noted in the comment. The comment period, which was open until July 15, 2003, provided sufficient time for these and other agencies to provide input on the draft plan.

## ALTERNATIVES

The “Alternatives” section was the most commonly commented-on section of the GMP/EIS. This section received more than 4,400 comments, almost 90 percent of which were non-substantive expressions of support for or opposition to one or more of the alternatives.

### Issue 1: Text Should Be Corrected

#### Comment: Regarding Alternatives

##### Alternative A

U.S. Park Police substation, Page 76 - Proposed BMPs should be implemented for mitigation of bacteria runoff.

Edgewater: Page 76 - Specify pollutant as “bacteria runoff”.

##### Alternative B

Edgewater: Page 85 - Proposed BMPs should be implemented for mitigation of bacteria runoff.

##### Alternative C

Page 94 - Proposed BMPs at Edgewater should be implemented for mitigation of bacteria runoff.

##### Alternative D

Page 103 - Proposed BMPs at Edgewater should be implemented for mitigation of bacteria runoff.

Page 119 - Last paragraph: The last sentence indicates sources of high bacteria concentration in upper Rock Creek. Recent bacteria source tracking investigation (ongoing D.C. Department of Health study) has shown elevated bacteria levels from ‘livestock’ immediately downstream the stable facilities. Include horse stables as sources. Include this source also on page 123 in list of point and nonpoint sources of water pollution.

Page 120 - Second paragraph: The volume of combined sewer overflow is incorrectly stated as being 42.5 million gallons during a 1 hour storm. It is 49 million gallons per average year.

Last paragraph - Replace “The District of Columbia Water Resources Management Division ...” by “The District of Columbia, Department of Health ...”

(From the Washington District of Columbia Department of Health, Environmental Health Administration, Bureau of Environmental Quality, (rocr1736.009))

**Response:** These changes were made in the final general management plan and environmental impact statement.

## ALTERNATIVES

### POTENTIAL MANAGEMENT PRESCRIPTIONS

#### Issue 1: Change a Management Prescription

**Representative Comment 1:** Inclusion of the siting of wireless communication facilities within the Urban Recreation Zone should be eliminated.

This zone includes the public horse stables, equitation field, golf course, tennis courts on Park Road, Picnic Groves 1, 6, 7, 8, 9, 10, 13, 14, 23, 24, the Carter Barron Amphitheater, and the community gardens at Melvin Hazen and Bingham. This is giving the telecommunication industry notice that alternative sites exist in the park and would be a direct conflict with the proceedings associated with the NCPC's decision to allow the towers now at the maintenance yard and the tennis stadium. In statements made by NPS officials, the maintenance yard and the H3 stables were the only two areas in the park that telecommunications facilities would be allowed. The park's control over where these facilities would be sited would be severely compromised by leaving this statement in the GMP.

The maintenance yard, H3, and Edgewater Stables are included in the Administration/Operations Zone. Telecommunications siting is also recognized in this zone. Although a facility exists in this zone, the inclusion of this statement should be reviewed. The park needs to be able to review each application on a case by case basis.

Siting of telecommunication facilities in the park are site specific actions and should not be dealt with on the GMP level. (rocr2981.010)

**Response:** Under federal law, companies have the right to apply to place their telecommunications facilities on federal land, which includes park lands such as those administered by the National Park Service. The National Park Service must consider these applications for the use of park lands, and possibly permit this use. This process is spelled out in detailed NPS policy guidance that must be followed.

As a result of the lawsuit that was referenced in this comment, the National Park Service performed a second environmental assessment pursuant to the National Environmental Policy Act (NEPA), concerning the current telecommunications facilities located in Rock Creek Park. From that process, the National Park Service made a finding of no significant impact (FONSI) and decided to conduct a study on the effects of telecommunications like these at additional facilities. The National Park Service will use what it learns from these studies as it considers future applications and in making other related decisions.

### ENVIRONMENTALLY PREFERRED ALTERNATIVE / NEPA SECTIONS 101 AND 102

#### Issue 1: Alternative C Should Be the Environmentally Preferred Alternative

**Representative Comment 1:** It is evident that the environmentally preferred alternative here is Alternative C, and that the Park Service's contrary conclusion in the language pasted into the draft EIS is patently inaccurate. See Draft EIS at [page] 64. Indeed, the Park Service's only rationale for choosing Alternative D over Alternative C is that the former alternative --which opens

Beach Drive during rush hours and continues to encourage the Parkway as a commuter thoroughfare with rush-hour lane reversals -- is more consistent with the goal of continuing to allow "automobile touring" in the Park. However, the Park Service completely ignores the distinction between "touring" -- i.e., entering the Park in order to enjoy the scenery and other values it has to offer -- and "commuting" -- i.e., using the road as a way to get from point A outside the Park to point B outside the Park as quickly as possible. In short, since the road management associated with Alternative D seeks to promote commuting, and commuting is not a value that the Park has any business protecting or promoting, it is evident that Alternative C, which protects relevant park values -- e.g., quiet, air quality, scenic values -- by eliminating commuting on Beach Drive is environmentally preferable.

Apparently, the Park Service officials preparing the Draft EIS agreed with this conclusion, because the language about Alternative D being preferred was pasted onto the Draft EIS after it was issued. Thus, under the pasted inserts is the original language of the Draft EIS, which states that [commenter copies text from an earlier draft of the document that provided a possible justification for identifying Alternative C as the environmentally preferred alternative].

In short, the Park Service must recognize that, as the agency had concluded at the time the Draft EIS was printed, irrespective of which Alternative the agency chooses under NEPA, Alternative C is plainly the environmentally preferred alternative. (rocr2751.004)

**Representative Comment 2:** Once the Park Service recognizes that the agency has no mandate to protect commuting in the City, it is evident that Alternative C is the Alternative which best promotes the values the Park Service is required to protect. As the Draft EIS, and common sense, dictate, removing cars from the upper sections of the Park will best promote the protection of the Park in its "natural condition," and best "conserve the scenery and the natural and historic objects and the wild life therein [so as to] leave them unimpaired for the enjoyment of future generations." 16 U.S.C. § 1. (rocr2751.005)

**Response:** As pointed out on pages 61 through 65 of the draft plan, the three action alternatives all have substantial advantages compared to the alternative to continue current management. Preliminary justifications were written regarding why each of the action alternatives might be considered the environmentally preferred. The preliminary justification for Alternative C, which was seen by this commenter, identified this alternative as environmentally preferred "by a close margin."

After the preliminary justifications for the action alternatives were prepared, there was a discussion to identify the environmentally preferred alternative that involved NPS personnel from the park and region, and from national resource groups. The evaluation considered the park's natural resources, its human environment (the ability of visitors to use the park without impairing its potential for future enjoyment), and the cultural resource environment (the "historic objects" referenced in the Organic Act, 16 U.S.C. §1). The ability of Alternative D to maintain the road network, which is one of the park's primary cultural resources, and to continue the traditional park use of traveling the length of Beach Drive by automobile, while achieving most of the Alternative C benefits to natural resource, resulted in the selection of Alternative D as the environmentally preferred alternative.

## ALTERNATIVES

This conclusion was reanalyzed in preparation of the final plan. It was reconfirmed, based on the Organic Act's identification of the need to consider several types of resources, that Alternative D is the environmentally preferred.

### **SUPPORT FOR OR OPPOSITION TO THE ALTERNATIVES**

The National Park Service received more than 3,500 comments supporting or opposing alternatives. Typically, the reviewer also provided an explanation for their stated position. These explanations usually cited personal experiences or made predictions of effects that would occur if a particular alternative were implemented. These comments were handled as follows.

- “Votes” for or against an alternative were classified as non-substantive, but were coded and recorded in the database.
- Unless they were very general in nature and completely unsubstantiated, predictions of effects were classified as substantive, coded by impact topic, and recorded in the database as comments regarding “Environmental Consequences.”
- Personal experiences were not coded or recorded in the database.

Some commenters proposed changes to the alternatives. All such suggestions were classified as substantive and recorded as “New Alternatives or Elements.”

### **COMPONENTS OF THE ALTERNATIVES**

#### **Issue 1: Evaluate an Alternative That Does Not Change Traffic Management but Makes Other Improvements**

**Representative Comment 1:** Why do we not see a plan that deals with the non-roadway issues and maintains the current roadway structure? For example, on page 22, could not archeological resources be protected without changing traffic patterns? In the Traditional Park Character section, could not worn, inaccurate, and dated exhibits be updated without changing traffic patterns? I have to believe that non-traffic improvements are possible without changing traffic patterns. (rocr0629.001)

**Representative Comment 2:** I think it is unfortunate that the Park Service, in putting forth its various proposals, didn't offer an alternative that included no change in the management of traffic and some of the reasonable enhancements included in the other plans, thus weighting the plans A, C and D with “goodies” in the hopes of winning public approval. (rocr3034.002)

**Representative Comment 3:** We recommend that the National Park Service adopt out of alternatives A, C and D the following proposals and add them to alternative B, namely: (a) upgrade park trails; (b) increase use of park historic resources for interpretative and educational purposes, and; (c) improve park introduction information services and finally; (d) relocate the park administrative facilities and park police substation outside the park. (rocr3079.003)

**Representative Comment 4:** The three alternatives as presented preclude comparisons and trade-offs. Your cover letter deals only with traffic. The plan, however, groups traffic discussion with park maintenance issues. There is no explanation of why, for example, regardless of what happens to traffic patterns, trails can't be rehabilitated, or why the intersection of Beach Drive and Rock Creek Parkway can't be improved. By grouping "improved management" alternatives along with your traffic recommendations, you force one to accept only the maintenance choices shown under the preferred traffic choices. (rocr2958.006)

**Response:** As described in the "Purpose of and Need for Action" section, the plan emphasizes traffic management because it was identified by citizens and the National Park Service as the most important issue related to the management of Rock Creek Park. Based on comments from the public during scoping, current traffic conditions were considered to be unacceptable. Therefore, it was not considered reasonable to create an alternative with improvements to other areas that did not address the park's traffic problems.

Under the National Environmental Policy Act, a different alternative can be developed and selected after the draft document has been reviewed by the public, so long as all of its *components* were evaluated within the environmental impact statement. It is standard NPS practice to formulate the final, preferred alternative using a process called "Choosing by Advantages" that identifies and consolidates the most advantageous components of all of the alternatives. As such, it would be possible to select and implement a management approach that improved the management of other park resources without changing traffic management.

## **Issue 2: The Range of Alternatives Is Inadequate**

**Representative Comment 1:** Current alternative offered by the NPS are deficient.

- Current alternatives pit traffic restrictions against recreational and educational benefits.
- There is a need for an alternative that preserves current "open corridors" for weekday traffic while providing for enhanced recreational and educational opportunities and modification to administrative and police offices and personnel.
- There are no alternatives that would involve enhanced recreational facilities such as bike and pedestrian trails, other than those that would close Beach Drive. (rocr2999.008)

**Response:** The alternatives presented a full range of options. Two of the alternatives, A and D, were designed to represent middle positions that balanced recreation and traffic and from which all groups would perceive benefits.

The concept of "open corridors" in the second bullet is embodied in Alternative A and Alternative D. The components listed in the last bullet are included in Alternative A.

## ALTERNATIVES

### **Issue 3: The National Park Service Makes an Insufficient Commitment to Implementing the Alternatives**

**Representative Comment 1:** Various traffic-calming measures that NPS “may” implement are repeatedly mentioned but the reader is left with a sense that, due to unpredictable funding or other policy issues, none of these measures may in fact ever see the light of day. (rocr0332.007)

**Response:** The general management plan includes a firm commitment by the National Park Service to implement traffic calming measures. The term “may” was used because the exact types and locations of these measures have not yet been determined. The National Park Service will be conducting traffic studies to determine the most appropriate actions to implement.

### **Issue 4: Other Features Should Be Included in Alternatives**

**Representative Comment 1:** The plan is vague regarding where the Park Police substation and the Park administrative offices are to be relocated. The Park Service should commit in the final document to build no new facilities in the Park for these purposes that would cause removal of mature trees, increase impervious surfaces, or otherwise degrade the Park’s natural features. (rocr2925.017)

**Response:** The National Park Service cannot commit to such absolute statements. The National Park Service will manage Rock Creek Park consistent with its mandate in the Organic Act, the establishing legislation for the park and parkway, and the park mission, mission goals, and servicewide mandates and policies presented in the “Management Direction or Guidance” section of the general management plan.

**Representative Comment 2:** There are only two community gardens in the park. We should be thinking more in terms of two digits. There’s a lot of interest in community gardens. People look after a park when they have a community garden in the park. (rocr3064.003)

**Response:** Few comments were received during scoping on the need to expand community gardens. Therefore, providing additional areas for gardens was not included in any of the alternatives. Text to this effect was added to the final environmental impact statement in the section “Alternatives or Actions Eliminated from Further Study.”

## **IMPLEMENTATION OF THE SELECTED ALTERNATIVE SHOULD BE FLEXIBLE**

### **Issue 1: After Implementation, Changes in the Selected Alternative Should Be Allowed, Based on Actual Conditions**

**Representative Comment 1:** Flexibility. Since a GMP is a plan for long-term management, it is critical that it include sufficient flexibility to respond to changes in conditions within the framework of the overall plan. The draft GMP does include some flexibility. For example, Alternative D indicates that “the actual closure configuration may be adjusted.” (p. 95).

But more flexibility is needed in the event that matters do not develop as foreseen. For example, the following “reasonable scenario” is contemplated for Alternative D. Traffic-calming measures

and improved enforcement would hold traffic speeds to the posted speed limit (25 miles per hour).” (p. 100). But what happens if these measures are unable to keep traffic to 25 mph? Since Beach Drive is used by both cars and bicycles during the morning commute, it is a critical assumption of Alternative D that this shared use can be rendered reasonably safe.

At the moment, the speed limit is routinely violated by cars. This makes bicycle commuting both objectively and subjectively dangerous. The subjective danger means that many people are deterred from bicycle commuting.

The GMP should include flexibility to move to Alternative C if traffic-calming measures prove to be unsuccessful after a reasonable period of time for their implementation is allowed. Similarly, if it turns out that, for reasons of cost, safety, or otherwise, the mid-day closure simply is not working, flexibility should be given either to abandon the closure or to extend it to 24 hours a day. Similarly, flexibility to move to Alternative C should be built into the GMP in the event called for by a regional transportation plan.

Additional flexibility should also be given to make minor adjustments to the closure time. For example, if traffic conditions show that traffic between 9:00 and 9:30 is relatively light, the balance between allowing use of Beach Drive for commuting by car and by bicycle could be struck by extending the closure to begin at 9:00. This would make the Park usable for those who can adjust their work schedules to commute by bike through the Park starting at 9:00. Consideration in any event should be given to a 9:00 a.m. start time for the closure to cars. The GMP need not micromanage this kind of detail. (rocr1726.001)

**Representative Comment 2:** If the weekday closures are initiated, public comment should be sought within one year of such initiation regarding whether the closures should be continued. (rocr3140.004)

**Representative Comment 3:** I support the need for flexibility in implementing Alternative D, including tests of various alternative road closures for varying periods. I would particularly like to see closure of the affected sections of Beach Drive during all nonrush hour periods, starting, for example, with the 7:00 PM Friday to 7:00 AM Monday period. (rocr2922.004)

**Representative Comment 4:** The draft GMP/EIS should include flexibility for adoption of Alternative C if regional governments develop a transportation plan which calls for substantially increased bicycling and relies on Rock Creek Park for a significant element of that increase. (rocr1726.003)

**Representative Comment 5:** We believe that additional time periods should be considered for closure of the affected segments, beginning with an expansion of the weekend closures to encompass 7:00 PM Friday to 7:00 AM Monday, and ultimately encompassing, as Mayor Williams’ letter suggested, all non-rush hour periods. The key point is flexibility. It should not require 7 years of analysis and countless hours of input from interested parties to make adjustments to the closure configuration. (rocr2925.024)

**Response:** Each alternative is a generalized concept. As such, details can be adjusted to improve the effectiveness of the selected alternative in meeting its specified goals.

## ALTERNATIVES

The National Park Service will use adaptive management as an important component of its management strategy. This means that the National Park Service will monitor the success of the initially implemented actions in achieving the alternative's goals and make changes as necessary as it becomes apparent that goals may not be met.

The park superintendent has the authority to implement measures that will make the roadways more safe, including implementing traffic calming measures. The general management plan would not preclude the superintendent from identifying and implementing such actions.

The planning horizon for a general management plan is 15 to 20 years. However, NPS planning guidelines recognize that circumstances can change and that general management plans sometimes need to be modified. Therefore, a general management plan amendment could be prepared at any time after the general management plan was approved and put into effect. Such an action would involve National Environmental Policy Act compliance, including preparation of an environmental assessment or environmental impact statement and opportunities for public review and comment.

## NEW ACTIONS OR ELEMENTS

Commenters suggested more than 500 actions or elements that they thought should be incorporated into alternatives to improve the management of Rock Creek Park. Many of the comments for new alternatives or elements contained details describing where problems were occurring and how they could be addressed.

Many suggestions were not applicable to general management planning, but will be useful in developing plans that tier from the general management plan, including 5-year strategic plans, annual performance plans, and implementation plans. Therefore, the suggestions have been consolidated in the database that will be consulted in the process of preparing these plans.

This section provides representatives for the complete range of suggestions received on the general management plan. In some cases, a response was provided. However, in many cases, the comment was noted and entered into the database for future use.

### TRANSPORTATION, PARTICULARLY AUTOMOBILES AND BICYCLES

#### **Issue 1: Complete a Bike Path through the Park**

More than 90 comments suggested the best resolution to traffic management was to complete a bicycle trail throughout the length of the park. While many acknowledged that the terrain imposes constraints, most suggested that the trail be constructed parallel to Beach Drive.

**Representative Comment 1:** A more effective alternative would be to extend the network of bike trails throughout the stretches of the park that is closed to traffic on weekends. This alternative would increase recreational access to the park while preserving the integrity and safety of surrounding residential streets. (rocr0701.003)

**Representative Comment 2:** Revitalize and complete the bike trail. I have heard the argument that the park is too narrow, but this just shows how narrow the vision has been. There are horse trails on the other side of the creek that could easily be converted, or the new path could run along the ridge instead of in the valley. Since one of your plans proposes removing the horse center I assume it would be within the realm of possibility to convert a horse trail to a bike trail, a far less dramatic change. A new bike path doesn't have to follow the road. (rocr0716.003)

**Response:** None of the alternatives includes removing the horse center. However, the future trail plan may consider all aspects of trail planning and design. The proximity of the Edgewater Stables to the monumental core of Washington, D.C. is critical to emergency response time.

**Representative Comment 3:** Reassess the decision not to pursue additional recreational trails. The Park Service successfully has added recreational enhancements in the past. Bicycle trails

## NEW ACTIONS OR ELEMENTS

were not an original feature of the Park, nor was the golf course or the amphitheater. Certainly a recreational trail could be blended into the Park that would enhance, not detract. Perhaps the trail could go through the Gorge, perhaps not. A charette might be a productive way to look at creative options and assess various alternatives. (rocr0825.004)

**Representative Comment 4:** I would also urge you to revisit the idea of completing a bike path alongside the parts of Beach Drive you propose to close. While it would certainly be a more expensive and time consuming alternative, it is an alternative that might unite Park visitors instead of pitting them against each other. (rocr3028.003)

**Representative Comment 5:** As long as you keep trying to divvy up a single piece of pavement for inherently incompatible uses, there will be continuing tension. Just bite the bullet, complete paving the bike path, and one hundred years from now, people will still be grateful. (rocr2846.002)

**Response:** The 1980 and 1990 studies cited by many of these comments that recommended constructing a continuous paved recreation trail through the valley were not supported by any actual data on the practicality of such an action. Early in the general management planning effort, field investigations were conducted by NPS landscape architects, natural resource specialists, and civil engineers; representatives of the U.S. Fish and Wildlife Service; and the District of Columbia State Historic Preservation Officer. The investigations determined that there are multiple, severe impediments to trail construction along Beach Drive north of picnic grove 10 and in the area between Joyce Road and Broad Branch Road.

Bicycles are classified as vehicles and are legally entitled to use public streets (District of Columbia Code of Municipal Regulations, Title 18, Chapter 12, 1200.3). As a result, a trail through the valley would not necessarily separate recreationists from motorized vehicles or move bicycles out of the traffic stream, because bicyclists may choose to use the roadway rather than a paved trail.

Based on physical, cultural resource, and biological resource considerations, construction of a continuous, paved trail in the Rock Creek valley was judged to be impractical. Therefore, it was eliminated from consideration as a component of any of the alternatives in the general management plan.

This conclusion could be reevaluated in the future during, for example, preparation of the trail plan for Rock Creek Park. If needed, an amendment to the general management plan would be prepared to accommodate the change in park management.

### **Issue 2: Convert Bridle Trails to Bicycle Trails**

**Representative Comment 1:** Instead of closing down our public roadways, maybe you should consider reserving the bridle paths for bicycle use from 9:30 am to 3:30 pm. (rocr0374.009)

**Response:** The future trail plan will evaluate all aspects of trail planning, design, and use. However, the legislation that established Rock Creek Park charged park managers “to lay out and prepare roadways and bridle paths, to be used for driving and for horseback riding, respectively.” Therefore, until the National Park Service is directed otherwise by Congress, bridle paths will continue to be maintained for horseback riding.

### Issue 3: Complete a Bikeway Using Other Roads

**Representative Comment 1:** I recommend that NPS implement the alternative proposed in the 1980 study of alternatives for completing the bicycle system. That alternative proposed to build 5 1/2 miles of new bicycle trail paralleling Beach Drive and having no impact on auto traffic. However, if the north end of Beach Drive is not environmentally suited for the trails, then Oregon Avenue presents an option to consider. (rocr2855.006)

**Representative Comment 2:** There are many roads that are used in the park very little, even during rush hour. Please explore Ross Drive and Glover Road among others before making any decision. Those 2 roads connect and offer an expanse nearly as long as the Beach Drive section in question. It is easily accessible and has ample parking at either end. It is largely parallel to Beach Drive.

I drove it during rush hour this evening and saw not one car during my drive. Given the large disruption to the thousands of commuters and people in the neighborhoods where the traffic will end up, PLEASE explore and honestly consider other alternatives, before closing Beach Drive at any other time other than the weekends. (rocr0828.002)

**Representative Comment 3:** Wise Road, an alternative and apparently neglected optional road to close, would make an equally fine surface for recreation seekers with absolute minimal impact on automobile usage. Traffic on Wise Road, which pretty much parallels Beach Drive, is minimal and its closure would have negligible impact on traffic flow through the park. (rocr2885.004 and 009)

**Response:** The NPS' mandate relates to enabling visitors to enjoy the park's scenery, natural and historic objects, and wildlife, not in facilitating the movement of traffic. Therefore, the National Park Service has no reason to divert recreational users from Beach Drive to other park roads to facilitate Beach Drive's use for commuting and other travel between locations outside the park. However, comments of this nature suggested an approach that was incorporated in the NPS' preferred alternative in the final general management plan.

Throughout the park under Alternative A, the National Park Service may install engineered traffic calming measures and improve speed limit enforcement. In addition, Alternative A was modified to emphasize the control of traffic speeds on Beach Drive to enhance recreational use of the Rock Creek corridor. This could include decreasing speed limits on Beach Drive while maintaining the current 25 mile per hour speed limit on other park roads. In addition to making Beach Drive safer for nonmotorized recreation, the lower speed limits may cause some motorists to voluntarily use other park roads. In particular, these would include Ross Drive and Glover Road which, as the comments point out, are quite scenic and are aligned north-south, generally parallel to Beach Drive.

### Issue 4: Close Additional Roads to Motorized Vehicles

In addition to the suggested closures of Oregon Avenue, Wise Road, Ross Drive, and Glover Road that were made in association with Issue 3, commenters suggested eliminating motorized vehicles on:

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- Segments of Broad Branch Road (unspecified) (rocr1816.003)
- The Maryland section too. (rocr2729.000)
- The Rock Creek and Potomac Parkway from Broad Branch road south to the Connecticut Avenue area. (rocr0732.002)
- Beach Drive throughout the entire length of Rock Creek Park/Rock Creek Stream Valley. (rocr0345.002)

**Response:** Broad Branch Road and roads in Maryland are not managed by the National Park Service and the National Park Service does not have the authority to close these roads.

The Congressional intent for the Rock Creek and Potomac Parkway was to connect Rock Creek Park and the National Zoological Park (National Zoo) to Potomac Park with a scenic road. As such, the National Park Service does not have the authority to close the parkway to motorized vehicles.

The segments of Beach Drive that would remain open to motorized vehicles at all times under Alternatives C and D provide important east-west connections across the park. The existing weekend closures have demonstrated the effectiveness of the closures proposed in Alternative C and Alternative D in encouraging nonmotorized recreation. No changes were made in the areas proposed for closure in the final general management plan.

### **Issue 5: End Weekend Closures of Beach Drive and Other Park Roads**

**Representative Comment 1:** I would like to see Beach Drive re-opened to traffic at all times, 24/7/365. I believe the current closing of portions of Beach Drive is for the exclusive benefit of a small group and is discriminatory toward the majority of citizens. Rock Creek Park is an urban park, not a wilderness, and needs to be available to all. (rocr0631.001)

**Representative Comment 2:** Where is the option to "remove weekend automobile restrictions?" Radical idea? Bad idea? Maybe, maybe not. For you not to have included this as an option for formal discussion brings into question NPS management integrity. (rocr0664.001)

**Representative Comment 3:** BE IT FURTHER RESOLVED THAT: ANC 3F recommends that the National Park Service revisit the policy of closing certain portions of Beach Drive to motorized traffic on weekends and that these sections be open for the benefit and enjoyment of all citizens at all times. (rocr2987.003)

**Response:** Ending weekend closures was identified as a possible management approach, but initial scoping showed strong support for, and little opposition to, continuing weekend closures. Therefore, this was not included in any of the management alternatives. The justification for continuing weekend closures was added to the section "Alternatives or Actions Eliminated from Further Study."

**Issue 6: Provide More Bike Lanes or Bike Paths in Other Locations**

These comments recommended that additional bike lanes or bike paths, in addition to a bike path parallel to Beach Drive, were needed. Many comments just had the suggestion of providing more bike paths, but some contained recommendations about locations or requested specific information regarding additional bike paths.

**Representative Comment 1:** Please add bike access on Broad Branch Road. (rocr2731.000)

**Representative Comment 2:** I urge that you consider building a bike or hiking trail on Wise Road, between Oregon and Beach Drive. (rocr1522.003)

**Representative Comment 3:** For a few hundred yards, recreational users must share the roadway with motor vehicle traffic crossing the Park on Wise Road. On weekends, this short section of Beach Drive is often covered with both cars and recreational users -- including families with small children -- sharing this hazardous roadway with no separation. Because this section of Beach Drive includes turn lanes, it is wide enough to provide for a dedicated bike/pedestrian lane on the west side of the road, if properly reconstructed. (rocr2925.016)

**Representative Comment 4:** About a year and a half ago, as you know, the office of Jim Sebastian, the District's Bicycle Coordinator, did a study that demonstrated that this portion of Cathedral was wide enough to paint lines for a bicycle lane. ANC 3 examined the plans and unanimously passed a resolution in support. However, since Cathedral is on Park property starting beneath the Calvert Street Bridge, the District decided to wait until the Park completed its management plan so as best to cooperate in any changes you might be planning to make. (rocr1677.001)

**Representative Comment 5:** Please add in-depth discussion of additional EIS alternatives that include more paved trails for pedestrians and, possibly, bicycles north of Peirce Mill. Please spell out the standards NPS normally uses for new paved paths, (a) for pedestrians, and (b) for bicycles. For example, what minimum widths apply to (a)? to (b)? Please include (a) names and addresses of the standard-setting organizations, (b) statutes, regulations, NPS policies, and other legal documents mandating or encouraging use of those standards, and (c) what legislative or executive changes or waivers would be necessary to allow paving some path stretches relatively narrowly. Please include cost estimates for extending a paved pedestrian pathway all the way to the MD boundary assuming (1) construction to minimum pedestrian standards the whole way, and (2) construction of most stretches to minimum pedestrian standards but securing an exception for some stretches (e.g., twenty percent), with periodic widening as large trees die over the years and decades. Please include cost estimates for extending a paved bicycle pathway all the way to the MD boundary assuming (1) construction to minimum bicycle standards the whole way, and (2) construction of some stretches to minimum bicycle standards but securing an exception for some stretches over which cyclists might have to walk their bikes, as they do on portions of the C & O Canal tow path. (rocr0333.008)

**Response:** Trail improvements would be a major component of any of the action alternatives. In the draft general management plan, trail improvements were discussed under each of the multiple management prescription that comprised an alternative, and the entire trail program was difficult to perceive. A new section, "Summary of Trail Improvements" has been added in the final general management plan.

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To implement the trail program, the National Park Service would prepare a trail plan that would tier from the general management plan. The assessment, routing, and conceptual design elements of the trail plan would allow the National Park Service to determine optimal trail alignments that would minimize impacts of trails and avoid conflicts among visitors. The study would outline the trail design and construction standards to be used and would include maps and costs for trail alternatives. As part of this process, the National Park Service would provide National Environmental Policy Act documentation, which would include opportunities for agency and public review and comment. All of the comments received on the draft general management plan with recommendations regarding new locations for trails will be considered in the preparation of the trail plan.

### **Issue 7: Upgrade Existing Bike and Foot Trails**

Many comments were received regarding the poor conditions of existing trails in Rock Creek Park. Most simply stated a perceived need to repair deteriorating trails, but some identified specific problem areas that needed special attention.

**Representative Comment 1:** There has been a lot of talk about access provided by existing bike paths. What paths we do have are increasingly unsafe, even unserviceable. I have seen very little evidence over the past 3 decades that the National Park Service has any serious interest in maintaining multiuse paths at anything resembling federal standards. This remains a first order and entirely unresolved problem. For this new management it should be a top priority. I suggest that each of you, the 3 up there and others in the Park Service, take a morning or an afternoon on a weekend and walk from Peirce Mill south all the way to the Kennedy Center and take a look at that path. It's a disgrace. (rocr3118.004)

**Representative Comment 2:** I urge the Park Service to rebuild—I mean completely rebuild, not patch, those critically neglected paths before they're abandoned by increasing numbers of cyclists. This must be done regardless of how road closure decisions are finally reached. (rocr3118.003)

**Representative Comment 3:** The paved trail in Rock Creek Park is unsafe due to a number of factors. The management plan proposes to rehabilitate the existing trail, including realignments of the trail in some area. There are problems that merit specific mention in the plan.

- The section of the trail south of Shoreham Hill, which is dangerously close to motorized traffic, is one design problem area.
- Another design disaster on the trail is the western approach to the Zoo tunnel. A narrow, deteriorating bridge over the Creek at this busy juncture puts all trail users at great risk of inadvertently falling into the roadway or the Creek. While the management plan referenced the need for a 24 hour Zoo tunnel bypass for the trail, the need for a safer bypass in this area needs to be inserted.

Trail width is insufficient throughout the Park. While it may not be possible to achieve the trail width design standards of the American Association of State Highway Transportation Officials (AASHTO) in certain segments of the trail, opportunities to widen the trail at transition points would be particularly useful, such as the P Street trail crossing. (rocr0837.001)

**Representative Comment 4:** Trail Surface. Improved trail design could help mitigate the silting of the trail surface that occurs repeatedly in the Park. Another trail surface issue is the presence of granite cobblestones under the Pennsylvania Avenue Bridge. This is an unsuitable trail surface for bicyclists, rollerbladers, and wheelchair users and should be replaced. (rocr0837.002)

**Representative Comment 5:** I strongly urge the Park Service to make major improvements to the bike trail leading from the Park's south-western entrance to upper Beach Drive. The trail is currently in bad repair and too narrow to support the number of users, making for a very dangerous situation. (rocr0967.002)

**Representative Comment 6:** Of particular concern to many trail users is the crossing of the Rock Creek Parkway entrance ramp on Shoreham Hill, just south of the Connecticut Avenue bridge. This is perhaps the most hazardous location in Rock Creek Park for bicyclists and pedestrians: they must cross fast-moving motorists who rarely stop for the trail's crosswalk, which is placed at the bottom of a steep hill. We welcome NPS' intention to "redesign and rehabilitate for safety" the intersection of Beach Drive with the Parkway. Our preferred solution for the trail crossing is an underpass beneath the Parkway. A stop sign or a stoplight that could be activated by trail users may be an acceptable alternative, but a crosswalk alone is unacceptable. (rocr2925.00)

**Response:** The response, involving a commitment to prepare and implement a trail plan, is the same as the Issue 5 response. All of the comments received on the draft general management plan regarding where trails need to be upgraded will be considered in the preparation of the trail plan.

#### **Issue 8: Obtain Assistance for Maintaining or Upgrading Trails**

**Representative Comment 1:** The historic lower Bridle Path and retaining walls should be restored, along with the historic path from Pierce Park and Jackson Hill into the Park. This outreach should include a massive increase in use of volunteers to assist the Park. [Our organization] can assist with this effort. (rocr0315.005)

**Response:** The National Park Service will consider all offers for support or partnership.

#### **Issue 9: Improve Maintenance of Beach Drive, the Rock Creek and Potomac Parkway, and Other Park Roads**

**Representative Comment 1:** The surface of Beach Drive from the DC line to Rte 410 is in such bad repair that it can negatively impact the safety of bicyclists and other users. Please resurface that stretch as soon as possible. (rocr2889.002)

**Representative Comment 2:** Better maintenance of the parkway, including careful paving along the shoulders where bicyclists ride, could make the road much safer. Also, it would be good to replace the sewer grates. (rocr0495.002)

**Representative Comment 3:** Please also note that the pedestrian crossing striping on Park-owned Cathedral Avenue is completely faded (there is another crossing on Shoreham Drive that is in better shape). The "no buses on Cathedral" sign has lost its red paint, and we are noticing

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that more buses are violating the law as a result. A little upkeep there would be greatly appreciated as well! (rocr1677.002)

**Response:** Maintenance of park roads is an operations issue, not a planning issue. Maintaining the roads presents a major challenge with regard to funding, which dropped between 2001 and 2004. Park roads will continue to be repaired and repaved as funds become available. The National Park Service will continue to appreciate suggestions, such as Representative Comment 3, where low-cost actions can result in noticeable improvements.

### **Issue 10: Provide More Detail on How Beach Drive Will Be Maintained**

**Representative Comment 1:** Much of Beach Drive appears to be constructed on a berm paralleling Rock Creek (on one side or the other), with well-worn informal paths flanking Beach Drive on either side when the shoulders narrow. Walking along the shoulder nearest Rock Creek reveals instances of (1) visible erosion of the berm toward the Creek, (2) beginnings of cracks in the roadway paralleling the Creek without visible erosion as yet, and (3), at some places, constriction of shoulder space available (at either side) for traversing by pedestrians and non-motorized vehicles without going up on the roadway itself.

Please describe alternative methods of shoring up Beach Drive (e.g., rock, sheet piling, concrete wall). For each of the methods, please summarize and evaluate costs and benefits in terms of (1) erosion control, (2) roadway protection, (3) provision of enhanced space for stretches of pedestrian pathway, and (4) adding room to walk or ride bicycles. Please indicate advantages and disadvantages of selecting one, uniform shoring method versus a variety of methods, taking into account the multiple potential uses of the Rock Creek Valley bottom along which Beach Drive is built. Please offer one, cohesive discussion of these issues, together, rather than disassembling and scattering them in various, cross-referenced portions of the EIS. (rocr0333.009)

**Response:** The level of detail requested here is too great for a general management plan. When it is confirmed that roadwork is necessary and funding for corrective measures is secured, the National Park Service will perform engineering studies to design appropriate actions.

### **Issue 11: Reconfigure the Southbound Lane of Beach Drive**

**Representative Comment 1:** I recommend construction of a one lane bridge carrying the southbound lane of Beach Drive (beyond the tunnel) over the north bound lane of Rock Creek Parkway heading up to Calvert St. This slight bridge will carry southbound traffic onto the left lane of the two lanes coming down (south) from Calvert St. The design of the bridge could be compatible with the one further down connecting to Mass. Ave. or perhaps mimic the Connecticut Ave. Bridge. (rocr0749.001)

**Response:** The suggestion regarding a new bridge will be conveyed to the traffic engineers for their consideration.

**Issue 12: Implement Beach Drive Closures on a Trial Basis**

These comments proposed implementing traffic management control measures, including Beach Drive closures, on a trial basis. Proposed test durations ranged from one month to a year. Several comments pointed out that seasonal weather and school schedules affect park use, and suggested that a trial should be long enough to accommodate these effects.

**Representative Comment 1:** The only way to collect data and evaluate the impact on surrounding streets is to allow an adequate test of the Plan. That is how to determine usage during the six hours. Everything else is speculation. (rocr0515.001)

**Representative Comment 2:** A good test of that, with measurable results, might be worth the effort. I ask that you make the test fair though -- for a long period of time (after the novelty wears off) and over a variety of weather conditions and school schedules. (rocr0934.003)

**Representative Comment 3:** Neither side has the facts, causing a lot of time to be wasted in polemics. The facts can be obtained by a six-month trial closing of Beach Drive on weekdays during non-rush hours. The months of May through October are suggested to cover the three summer months when most school children are on vacation and many adults take their vacations during this period. During most of May, September, and October, few are free to use the park on weekdays. Data collected during the six-month period allow sound decisions to be made. (rocr3031.001)

**Response:** Alternative A, the preferred alternative, was modified in the final general management plan and environmental impact statement to include implementing traffic calming and other traffic control measures on a trial basis to distinguish effective and ineffective approaches. Alternative A also will use adaptive management techniques to identify and apply the most effective approaches for managing traffic on Beach Drive.

**Issue 13: Make Beach Drive One-Way or Provide One Traffic Lane**

**Representative Comment 1:** Instead of eliminating traffic altogether between the hours of 9:30 - 3:30, why don't you designate one lane "one way" south from 9:30 - 12:30 pm and one way north from 12:30 - 3:30. This would allow bikers, skaters, picnickers, and walkers to at least be able to drive into the park and use the parking lots and facilities while always leaving one lane open to people who wish to skate, bike, and walk. (rocr0707.001)

**Representative Comment 2:** I would like to suggest one change not included in any of the plans, which I believe would greatly reduce rush hour traffic congestion. That is to make Beach Drive one-way during rush hour between Rock Creek Parkway and Broad Branch Road. (rocr0730.002)

**Response:** This suggestion and the reason why it was not included in any of the alternatives was addressed on page 32 of the draft general management plan.

**Issue 14: Change Management of the Rock Creek and Potomac Parkway**

**Representative Comment 1:** I also think the two-way lane reversal [on the Rock Creek and Potomac Parkway] should be eliminated. Since more people are doing reverse commuting it would

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be helpful for everyone if the Rock Creek Parkway and all the Park were two way all the time. The District has eliminated many one-way street reversals for rush hour, i.e., 16th St. and other streets, and the Park Service should do the same. (rocr0741.004)

**Representative Comment 2:** The elimination of two-way traffic on the parkway could be a second modification. In its place could be the HOV restrictions. (rocr2981.008)

**Response:** As described on page 92 of the draft general management plan, these suggestions were considered in the draft general management plan. Alternative C would include ending rush hour lane reversals on the parkway and implementing high-occupancy vehicle restrictions during rush hours, southbound in the morning and northbound in the evening.

**Representative Comment 3:** I think that the Parkway outbound routes should be extended till 7:00 pm.” (rocr2865.001)

**Response:** Changing the timing of lane reversals for the parkway is not a general management planning issue.

### **Issue 15: Impose High-Occupancy Vehicle Restrictions**

Several commenters encouraged the National Park Service to include high-occupancy vehicle restrictions in management approaches for the park and parkway, while others opposed the use of this tool.

**Opposing Representative Comment 1:** Alternative A: HOV restrictions will force many cars onto city streets. (rocr0484.002)

**Opposing Representative Comment 2:** HOV restrictions are not equitable and would unfairly limit the parkway - one reason to go to the park is to be alone. (rocr2872.004)

**Supporting Representative Comment 1:** I support HOV/ + Motorcycle options for the park because I believe that any option that reduces traffic by increasing car pooling is the simplest and most effective way to decrease the damages of traffic on quality of life. DC should use every opportunity to promote HOV options where ever possible. (rocr0609.002)

**Supporting Representative Comment 2:** Under any alternative, the National Park Service should take addition measures to control traffic on all park roads open to automobiles. First, impose high occupancy vehicle (HOV) restrictions on roads known to be used by commuters so that only drivers who carpool with two or more occupants per vehicle (HOV-2) are granted the privilege of using park roads during rush hours. The 1996 license plate study commissioned by the National Park Service found that the majority of drivers during rush hour are in single occupancy vehicles. Implementing a HOV-2 requirement would provide area commuters with an incentive to help solve the region’s air quality problem by decreasing the number of cars on the roads. (rocr2754.008)

**Response:** Different management approaches using high-occupancy vehicle restrictions on Beach Drive and the parkway were included in Alternative A and Alternative C of the draft general

management plan. The impacts of high-occupancy vehicle restrictions on traffic and the visitor experience were included in the “Environmental Consequences” section.

#### **Issue 16: Implement Different Times for Closure**

**Comments:** More than 40 comments proposed different times for closure if Alternative D were implemented. Most recommended lengthening or shortening the closure period by a half hour in the morning, the afternoon, or both. However, one comment recommended limiting the mid-day closure to just two hours, from noon to 2:00 p.m. (rocr0555.002)

**Response:** As noted in question 1 of the Council on Environmental Quality’s “Memorandum to Agencies: Forty Most Asked Questions Concerning CEQ’s National Environmental Policy Act Regulations” (46 *Federal Register* 18026, 1981), there are an infinite number of possible alternatives for a proposal such as managing traffic on Beach Drive. Consistent with the Council on Environmental Quality’s answer to this frequently asked question, the Rock Creek Park general management plan and environmental impact statement included a “reasonable number of examples, covering the full spectrum of alternatives” that range from no change in current management to the permanent closure of three segments of Beach Drive.

In the final general management plan, all of the alternatives incorporate the principle of adaptive management, as outlined in Environmental Statement Memorandum No. ESM-03-6, dated July 2, 2003, from the Office of the Secretary, U.S. Department of the Interior. This memorandum emphasizes that management practices should be based on clearly identified outcomes and that management tools can be varied to optimize success in meeting the outcomes. For Rock Creek Park, the goals (desired outcomes) are defined at the beginning of each alternative description and within each management prescription. Adaptive management allows the National Park Service to modify features, such as the time of closure, to best achieve these stated goals.

#### **Issue 17: Why Eliminate Some Alternatives?**

**Representative Comment 1:** The Park Service states that Plan D would close several segments of Beach Drive to motorized traffic during the middle (non-rush hour) part of weekdays. These segments are currently closed to motorized traffic on the weekends. However, on page 29 of the draft document, the Park Service states that an earlier suggestion from the public to "Allow motorized traffic on portions of Beach Drive only during weekday rush hours" was excluded from consideration for [several] reasons.

How can the Park Service advocate on one page against partial road closure during odd hours based on the above objections, then state on another page its endorsement of a plan that calls for partial road closure during odd hours? (rocr0332.004)

**Response:** The National Environmental Policy Act requires that a full range of reasonable alternatives be evaluated, but clarification from the Council on Environmental Quality makes clear that every possible alternative need not be evaluated (Question 1b. in the Council on Environmental Quality’s “Forty Most Asked Questions”). Alternative D was included to represent an approach between no weekday closures of Beach Drive (Alternative A and Alternative B) and permanent, full-time closure of three segments of Beach Drive (Alternative C). The approaches for

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closing Beach Drive that are described on page 29 would have represented other possible management configurations, and the text was explaining why the National Park Service selected the Alternative D option over the others for detailed analysis.

The National Park Service does not advocate against or endorse road closure during “odd hours.” The discussion on page 29 referred to the suggestion to “Vary the time of weekday closures seasonally or based on time of sunrise and sunset.” In response, the draft general management plan stated, “Variable opening and closing times would be confusing and difficult to implement.”

### **Issue 18: Reverse the Closure Period**

These commenters thought the Alternative D closure should be reversed, with a road closure during the rush hour and a mid-day opening of Beach Drive.

**Representative Comment 1:** If you really want to reduce pollution, enhance non-motorized recreation, etc., the time to close Beach Drive would be when it is most heavily used by motor traffic (i.e., rush hour) and leave it open for touring during the far less-traveled mid-day hours. (rocr0583.001)

**Representative Comment 2:** If we need to talk about a compromise, I must say I’m very mystified by the compromise that we’re talking about. That is, allowing the rush hour traffic and then closure during the day. I would prefer the opposite. And if it is to reduce the impact of the cars in the park, it would seem to me that the reasonable thing would be to keep the park auto free from 3:30 in the afternoon until 9:30 in the morning, allow people and cars under this regulated speed limit to coexist during the middle of the day. (rocr3135.006)

**Response:** Alternative D was designed accommodate a request from the Washington, D.C. mayor to implement weekday vehicular traffic restrictions only during non-rush-hour periods. (The letter was included in Appendix D of the draft document). Please see the response to Issue 16. The Rock Creek Park general management plan and environmental impact statement included a “reasonable number of examples, covering the full spectrum of alternatives” that range from no change in current management to the permanent closure of three segments of Beach Drive.

### **Issue 19: Implement Other Closure Periods**

**Representative Comment 1:** Consider also closing the park to cars in the evening after rush hour. (rocr2736.000)

**Representative Comment 2:** I really think you need to close it, even if you only close it part of the time, during the week when people can use it which is really from 3:00 p.m. until dark essentially. That’s when most people could use it. (rocr3073.003)

**Representative Comment 3:** I would support closing the park on all days when DC Public Schools are not in session. This is because it is the DC kids who really need a break and a place to play. (rocr0686.002)

**Representative Comment 4:** At the very least, NPS should extend the weekend hours by keeping the gates closed on Friday and Sunday nights. That would give the wildlife a break for three

nights per week instead of just one, at no additional administrative cost to the Park Service. (rocr1566.005)

**Representative Comment 5:** How about [closing Beach Drive segments on] alternating Tuesday, Thursday evenings? (rocr2727.000)

**Representative Comment 6:** I propose closing the three segments to motorized vehicles and managing for non-motorized recreation between rush-hours only on Fridays. Dedicating Fridays – often called “casual Fridays” in Washington’s whirlwind world of work – to non-motorized recreation for those for whom this may be an important benefit of living in or visiting our nation’s capital is a way of honoring different interests. One weekday of closure of the 3 segments between rush hours is not likely to significantly impair the interests of those who typically enjoy and use the Park by driving through it in the middle of the day. However, it would allow those who enjoy the freedom from motorized vehicles in those 3 segments of the Park to take 3-day week-ends for this purpose. (rocr0304.002)

**Response:** Please see the response to Issue 16. The Rock Creek Park general management plan and environmental impact statement included a “reasonable number of examples, covering the full spectrum of alternatives” that range in no change from current management to the permanent closure of three segments of Beach Drive.

#### **Issue 20: Implement Seasonal Changes in Closures**

These comments recommended a seasonal change in management so that mid-day closures would be implemented in the summer, for up to six months, but not in the winter (during the winter months the closed section of Beach Drive is under utilized (rocr2999.007). A similar program in New York’s Central Park was cited as a successful model for this approach (rocr3128.003).

**Representative Comment 1:** [If] this is going to be about a six month thing, it’ll be worthwhile. The rest of the year people aren’t going to be using the park for bicycle riding and things like that. (rocr3129.001)

**Representative Comment 2:** We all must wonder whether there will be significant increases in recreational uses at 2 p.m. on cold January afternoons. (rocr0372.008)

**Response:** The preferred alternative could include seasonal changes in management. The text in the final general management plan was changed to reflect the potential to use this approach.

#### **Issue 21: Allow Automobile Use on Car Holidays**

Several commenters who preferred Alternative C or Alternative D supported the desires of those with limited mobility to enjoy the park, particularly during the changing seasons. All suggested what one called a “car holiday.”

**Representative Comment 1:** [We prefer Alternative C] with one exception, and that is from time-to-time it would be worthwhile to have a car holiday, that is one in which cars are allowed into the park, perhaps in the spring for a couple of days, perhaps during the fall, color season under a reduced speed limit and outside of the commuting hours. (rocr3135.005)

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**Response:** Alternative A, which is the NPS' preferred alternative in the final general management plan, does not include any additional closures of Beach Drive. Therefore, the concept of car holidays would not be necessary.

### **Issue 22: Improve Traffic Control**

Almost 60 comments cited the need for improved traffic controls on Beach Drive and other park roads. The most common statement was the need to enforce existing traffic laws, including speed limits.

Commenters most often recommended installing speed cameras, increasing traffic patrols, and increasing ticketing of violators (rocr0816.003). Other measures included:

- Installing speed bumps. (rocr0686.003)
- Enforcing existing regulations to keep trucks and other commercial vehicles out of the park. (rocr2762.002)
- Adding traffic lights at selected intersections. (rocr0377.002)
- Providing better pavement markings and signage. (rocr0777.002)
- Imposing large fines for tailgating, speeding, and passing illegally. (rocr0919.002)

**Representative Comment 1:** It would be more helpful if Park Police would patrol the roads throughout Rock Creek Park to inhibit speeding - encouraging the use of speed cameras and dispersing tickets. (rocr0816.003)

**Representative Comment 2:** An alternative could be numerous speed bumps and traffic restrictors. Those who want to drive home from work through the Park to relax after work will continue to do so. Those aggressive drivers who speed through will seek other routes, thus reducing both volume and speed of traffic. (rocr0849.002)

**Representative Comment 3:** Put all-way stop signs at every entrance to the park (from Connecticut Ave to Md. line.) This would slow traffic at all times, especially during rush hour, and those people who are using the park for a quick trip would abandon the park for the faster side streets. This would leave the park for those of us who don't mind taking a leisurely drive through a beautiful place. (rocr0686.003)

**Response:** Traffic control will be improved under any of the action alternatives. All three action alternatives include the intent to secure funding for two new full-time-equivalent staff positions for traffic enforcement and the lease of mobile speed-detection and ticketing (photo radar) devices. The action alternatives also include the installation of traffic-calming devices on Beach Drive and other park roads.

Although trucks are prohibited on park roads, a June 2004 traffic study conducted by the National Park Service found that trucks constitute about 3.5 percent of vehicles on park roads. The improved signage in the action alternatives would allow the National Park Service to better inform

truck drivers of the rules. Also, the additional staff positions included in the action alternatives would enable the National Park Service to better enforce existing regulations. The 2004 traffic study identified two locations with unusually high percentages of trucks that might be effective sites for enforcement.

### **Issue 23: Regulate Cyclists**

Drivers and pedestrians noted that some bicyclists operate in an unsafe manner and that regulation of cyclists should be improved.

**Representative Comment 1:** We also encourage you to regulate how cyclists use the Park's roadways. Cyclists use the roadways when bike paths are readily available. On week-ends when Beach Drive is closed, many travel in packs at high speed and make it dangerous for pedestrians (older people and children) with little or no consideration for others. We have picked up trash left by cyclists on many occasions (discarded inner tubes and repair kits, etc.), so their concern for the Park's environment is not quite as solid as they might assert. Their use of the Park should be regulated. (rocr0455.002)

**Representative Comment 2:** Many bicyclists choose to ride in the roadway regardless of whether a path is available or not, and that's not fair. Bicyclists should be required to use the available paths, and complaints from some bicyclists that pedestrians make these paths unusable should be exposed and dismissed as disingenuous. (rocr0736.002)

**Representative Comment 3:** May I also suggest that the Park Police should strictly enforce the law that requires groups of bike riders to ride single file on Beach Drive. They often block traffic by riding two, three or four abreast. This is a dangerous as well as an inconsiderate practice and should be stopped. (rocr2878.003)

**Representative Comment 4:** Bicyclers in the park exhibit the same lack of respect for the law and their fellow man that they exhibit elsewhere. They generally do not stop for traffic signals, they often ride in formation blocking the entire lane, and they usually eschew the paths built for bicyclers and walkers. (rocr2887.002)

**Response:** Throughout the nation, bicycles are classified as vehicles and are legally entitled to use public streets. In Washington, D.C. this provision is included in District of Columbia Code of Municipal Regulations, Title 18, Chapter 12, 1200.3. As a result, bicyclists may ride in a roadway even if a sidewalk or bike path is available.

Bicyclists who choose to ride on roads must conform with motor vehicle laws, including speed limits. Specifically, "Every person riding a bicycle on a highway shall be subject to all the duties applicable to the drivers of motor vehicles" (1201.1) and "No person shall operate a bicycle at a speed in excess of any posted limit" (1201.8). They also are required to be courteous: "No person operating a bicycle upon a highway shall unduly or unnecessarily impede or obstruct traffic" (1201.3).

The U.S. Park Police currently enforces traffic laws for both motorists and bicyclists. However, staffing levels are insufficient to meet current need. Two new staff positions for traffic enforce-

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ment are included in the action alternatives. These positions will enforce traffic laws, including speed limits and stop signs, for bicycles as well as automobiles.

### **Issue 24: Reduce the Speed Limit in Rock Creek Park**

**Representative Comment 1:** I would support returning Rock Creek to a real park, which to me means limiting the motorized vehicles to local access at no more than 20 mph. (rocr2907.001)

**Representative Comment 2:** Large speed signs (i.e. – 15 mph) should be posted in these areas like reduce speed signs in school zone areas. A large speed sign should be posted at the onset of this semi-closed section of Beach Drive. (rocr0419.002)

**Response:** Alternative A was modified in the final general management plan to include reductions in the speed limit on Beach Drive.

### **Issue 25: Consider Other Transit Modes**

These comments addressed the absence of any transit system within the park that could transport visitors who did not use cars or bikes.

**Representative Comment 1:** My family has traveled to over 150 national parks in the U.S. and our daughter has participated in Junior Ranger programs. We gladly left our car behind and rode shuttle buses to see the sights in Grand Canyon, but I don't see a similar plan for Rock Creek with these two alternatives. They just appear to ban cars completely with only biking and walking access. (rocr0770.003)

**Representative Comment 2:** I would like to propose Alternative E - Rock Creek Park for everyone! How about a shuttle bus on weekends to carry people from Columbia Heights and Cleveland Park metros down to the beginning of the closed section of Beach Drive? (rocr0935.007)

**Representative Comment 3:** In order to address people's legitimate concerns about access, I feel that public transportation should be added to the park. At present there are no buses that conveniently serve the heart of the Park (the H2 and H4 come close, but let people off in very pedestrian hostile areas). And there is no transportation whatsoever to the part of the Park that will be closed. This seems a major and regrettable oversight that lends credibility to the notion that the Park is only for the wealthy neighborhoods that border it. (rocr1817.002)

**Representative Comment 4:** One thing I don't think people focus on is tourists. Rock Creek could be a tourist central for Washington, D.C. The shuttle bus that goes from Memorial to Memorial throughout D.C., which is how everybody gets around, a very eco-sensitive way to get around, could come up to Peirce Mill, drop people off at Peirce Mill. See some history that very few people see, very few people visit there. And then maybe they could rent them a bike, maybe they could rent them some roller blades, and then they could take in the rest of Rock Creek. It could be a vital center for the nation as opposed to a vital center for the people living right here. (rocr3112.004)

**Response:** The National Park Service is currently studying an alternative transportation system for the parks of the city and is considering Rock Creek Park as a destination.

**Issue 26: Improve Park Access from the East**

**Representative Comment 1:** The Park urgently needs to restore, enhance, or construct non-motorized trails into the Park from the communities along its entire eastern boundary. The lack of sufficient safe, welcoming, and maintained non-motorized access at numerous key sites along the east side of the Park is a major environmental injustice that severely undermines the park's value and significance in the lives of tens of thousands of people living in the city's most diverse neighborhoods. (rocr0315.001)

**Representative Comment 2:** Pedestrian Access along the East Side of the Park. We encourage the Park Service to include measures that enhance pedestrian access to the Park from the east side, particularly around Carter Barron. One such approach would be to reserve Morrow Drive for pedestrian access except during events at the tennis stadium or Carter Barron Amphitheater. Alternatively, NPS could construct a paved trail along an existing roadway such as Piney Branch Road. (rocr2925.012)

**Representative Comment 3:** Alternative D is ridiculous. It would maintain commuter traffic while making it difficult for those who live south and east of the park (i.e. poor urban minorities) to have good access during the day. (rocr0935.005)

**Response:** The east side of the park is very steep and it is difficult to find areas of moderate slopes to provide pedestrian and bicycle access. The National Park Service has already identified the installation of a new trail along Piney Branch Road as a goal to be completed under this general management plan. As it develops more specific plans that will tier from the general management plan, the National Park Service will consider other opportunities to improve access to the park from the east.

**Issue 27: Improve Park Access for Visitors Participating in Nonmotorized Recreation**

**Representative Comment 1:** Under any alternative, the National Park Service should explore feasible options for improving park access for non-motorized park users. Too few access points to Rock Creek National Park exist so that pedestrians and bicyclists may access the park safely without competing with automobiles. (rocr2754.010)

**Response:** The final general management plan includes this as a component of the trail plan that would be prepared as a part of any action alternative.

**Issue 28: Improve Connections to Facilities Outside of the Park**

These comments offered suggestions on improving connections between the park and other facilities in the Washington, D.C. area. Many of these comments acknowledged that this was a regional situation that would require the park to coordinate with many other agencies.

**Representative Comment 1:** We need a bike route plan, not just more bikes on Beach Drive. If you are going to do a bicycle route plan, it has to be from Wisconsin to Georgia, not just a plan inside the park. So you have to work together with city and regional planners from outside the NPS as to where those routes are needed, for instance, from American University to UDC, con-

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necting bicycle trails from Metro stations on the west side of the park to the east side of the park. (rocr3064.002)

**Representative Comment 2:** Create a separate network of paths for non-vehicular traffic, starting with the long-discussed separate path along Beach Drive. Such paths should connect the city's major cross-town arteries as well as link into the existing network, and keep bikers and walkers safely segregated from the vehicular traffic flow. (rocr0305.002)

**Representative Comment 3:** I have a concept of enhancing Rock Creek Park to make it more accessible to all residents of W-DC, MD & VA. This would include bike and hike routes to nearby places of interest (schools, Civil War Forts, Metro Stations, libraries golf & tennis and so forth). (rocr1671.001)

**Representative Comment 4:** CONNECTION. There should be more easy, enticing, and educational connections between the Park and the wider Fort Circle, Escarpment, C & O Canal/Capital Crescent, and Potomac Heritage National Scenic Trails. (rocr0315.002)

**Response:** The final general management plan and environmental impact statement was modified to include more emphasis on linking with other recreational facilities, particularly in the "Connected, Cumulative, and Similar Actions" section.

The NPS' Fort Circle management plan that was approved in 2003 promotes the creation of a Fort Circle Parks Trail that begins at the base of Palisades Park on the Potomac River at the C&O Canal and travels through Rock Creek Park, connecting it with Fort Circle parks on the east and south parts of the District. The C&O Canal, Capital Crescent, and Potomac Heritage National Scenic Trails are braided trails that connect all of the capital city with trails in adjoining states. The National Park Service is supporting the designation of such trails throughout the District.

For the Fort Circle trail system, the National Park Service is developing a broad range of interpretation aids, including brochures and electronic media, to provide education and interpretation. The National Park Service can provide assistance to others for similar activities throughout these trail systems.

## ADMINISTRATION AND OPERATIONS FACILITIES

### **Issue 1: Relocate the Administrative Offices and District 3 Substation and Reuse the Historic Buildings**

**Representative Comment 1:** Administration and Operations: We endorse the relocation of the administrative offices and police headquarters out of the historic structures to commercial space outside and near the park. We offer the following additional recommendations:

a) No new construction. We oppose the construction of new facilities within the park for administration and operations. We believe it is best to remove these activities and their impacts from the park.

b) Plan for re-use. Prior to moving out of the current facilities, however, the plans and agreements for the restoration and reuse of Klinge Mansion and the Lodge House must be approved. (rocr3030.012)

**Response:** As described on page 75 of the draft general management plan, the National Park Service prefers to move these functions out of the park and avoid new construction within the park. This approach is consistent with Section 9.1 of *Management Policies 2001*.

The final general management plan was modified to clarify the approach that would be taken if locating administrative functions in commercial space outside the park was judged to be not feasible. In that case, a study with accompanying National Environmental Policy Act documentation tiering from the general management plan and environmental impact statement would be conducted to determine the most appropriate approach or location to house administrative services. This study would include a complete range of alternatives, such as continuing use of the existing facilities (the no action alternative), reconsidering commercial space, constructing new facilities at any of several possible sites within park boundaries, and co-locating with other, existing NPS facilities outside Rock Creek Park.

The Klinge Mansion would undergo historic preservation treatment and its most appropriate use would be determined. The plan for the rehabilitation and reuse for the Lodge House was included in pages 73 and 74 of the draft general management plan.

## **Issue 2: Consider Other Sites for Park Administrative and Operations Facilities**

**Representative Comment 1:** The GMP should thoroughly investigate alternative sites for moving park facilities so as to reduce impacts to park resources. The golf course area and Carter Barron area could be utilized for the relocated park police substation. The H3 stable operation could be moved to Edgewater Stables, consolidating the USPP horse operations. Moving the H3 stables may provide enough room to accommodate the move of the substation. (rocr2981.013)

**Response:** The area near the Carter Barron Amphitheater was not considered for the U.S. Park Police substation in the draft general management plan because, when the planning process began in the late 1990s, there was opposition to use of this site by the local neighborhood. Moreover, the management plan for this area that was published in 1995 did not include a substation. A discussion of this situation was included on page 35 of the draft general management plan.

The draft Rock Creek Park general management plan and environmental impact statement included a reasonable number of examples, covering the full spectrum of alternatives that include leaving these functions in their current locations, moving them outside the park, and building new facilities within the park. The final general management plan includes a commitment to conduct a project-specific environmental analysis under the National Environmental Policy Act if these facilities cannot be relocated outside the park.

## **Issue 3: Relocate or Consolidate Horse Facilities**

**Representative Comment 1:** Just as the other administrative and operational functions are proposed to be moved out of the Park, the regional Park Police horse training function at Edgewater

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should be examined to determine whether it is serving the Park in its present location. (rocr0315.005)

**Representative Comment 2:** The H3 stable operation could be moved to Edgewater Stables, consolidating the USPP horse operations. Moving the H3 stables may provide enough room to accommodate the move of the substation. (rocr2981.013)

**Response:** Moving the U.S. Park Police horse training facility or consolidating horse facilities was not considered in the general management plan. The proximity of the Edgewater Stables to the monumental core of the city is critical to emergency response time. This information was added to the “Alternatives or Actions Eliminated from Further Study” section in the final plan.

### **Issue 4: Provide Better Utilization of Space at the Maintenance Yard**

**Representative Comment 1:** One item that the GMP should address at the same time as any discussion of moving facilities is moving the old Capital stones from the rear of the maintenance yard. These stones have been stored there for nearly 50 years and their removal would facilitate some expansion of the maintenance yard. (rocr2981.013)

**Response:** Page 76 of the draft general management plan included a commitment to rehabilitate the maintenance area to correct problems and improve the utilization of space. Removing these stones will be considered in developing the plan for this area.

### **Issue 5: Change Staffing Levels**

**Representative Comment 1:** Staffing for the park. Staffing levels, in number and grade level, need to be raised to properly recognize the significance of this park to the Nation’s Capital. At a minimum, the National Park Service or federal Office of Personnel Management should elevate the grade requirement of the Superintendent to the level of Grade 15 or Senior Executive Service (SES). (rocr3030.012)

**Response:** Staffing was addressed in the descriptions of the alternatives. Costs were included in table 5 on pages 78 and 79 of the draft general management plan. These were updated to 2004 in the final plan. The action alternatives would include eight new full-time-equivalent staff positions, including two positions for speed and other traffic enforcement and six positions to improve visitor contact, education, and interpretation. There would not be any changes in the grade levels of existing staff positions.

## **INTERPRETATION, ORIENTATION, RECREATION, AND EDUCATION FACILITIES**

### **Issue 1: Improve Signage and Other Orientation**

**Representative Comment 1:** Some more small signs telling you where you are might be helpful. (rocr2726.000)

**Representative Comment 2:** My one suggestion where I think the Park Service falls down badly on the job is that your signage is so weak, poor and nonexistent that most Washingtonians are

confused most of the time about where things are and how the park works. And if you put in a decent signage system you'd get much more support for this entire proposal. (rocr3119.004)

**Representative Comment 3:** Under any alternative, the National Park Service should strive to improve the park interpretation, education and information that it offers to the visiting public. We recognize that the park's 24 entry routes present unique challenges in permitting the National Park Service to reach park visitors. As the National Park Service recognizes, many park visitors do not realize they are in a national park. (id. at p. 30). We recommend that the National Park Service place signs at all entry points announcing that visitors are entering Rock Creek National Park. Where appropriate, such signs should include orientation information and a map clearly showing the location of the sign as well as National Park Service visitor centers and other notable park features. We also suggest that the National Park Service explore the feasibility of broadcasting a radio transmission through the park, as is done at other national parks, to provide park information to drivers, including information about visitor centers and restrictions on traffic on various park roads. Appropriate signs at park entry points should inform drivers of the radio frequency. (rocr2754.011)

**Response:** The final general management plan was modified to clarify the intent to improve signage and other orientation within the park. Specifically, it is first mentioned in the Valley Floor Controlled Automobile Access Zone for Alternative A. Implementation details will be developed in subsequent planning steps.

## **Issue 2: Improve Interpretation**

**Representative Comment 1:** Public Education & Partnerships. The Park General Management Plan will not be complete absent a comprehensive interpretive plan for the park. Going beyond the present locus of interpretation in a small section of the upper part of the Park, the interpretive plan should include a fuller assessment of the cultural and environmental programming and stewardship possibilities for the entire Park. This is essential for restoring and deepening lasting community engagement in supporting the life and future of the Park.

The plan should identify and work with community partners to assess and develop interpretive and stewardship programs for significant geological, ecological, and cultural sites throughout the park.

In addition to all of the sites within the main part of the Park, the plan should link the Park to sites of historic significance that are adjacent to or near the GMP study area, such as Montrose and Dumbarton Oaks Parks, the Mount Zion and Female Union Band Cemetery, Jackson Hill and the Holt House, Historic Adams Mill Road, the Pierce Park African American and Quaker burial grounds, the Calvert Street "toddle house," Meridian Hill Native American spiritual ground, and similar historic sites.

It is critical that the interpretive plan be integrated into the GMP, so that critical facilities, operations, stewardship, circulation, and funding questions are addressed in the context of interpretive needs and possibilities. In this way, every program in the Park will advance a broad-based, active, permanent constituency to stand up and help the park, such as those that help other major urban parks across the nation.

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Finally, the comprehensive interpretive plan should develop options for working with community partners to develop interpretive programs and products and to advance permanent community-based park advocacy, partnership, and conservancy. (rocr0315.003)

**Representative Comment 2:** A suggestion: the Park Service should assess trends for each of the topics considered in the Natural Resources chapter-air quality, watershed quality, wetlands, deciduous forests, protected and rare species, and other wildlife. A periodic communication could provide park constituents with a “report card” on the effectiveness of natural resources management plans. (rocr0829.004)

**Response:** The National Park Service typically prepares or updates a park’s interpretive plan as soon as the general management plan for a park is completed. An interpretive plan for Rock Creek Park will be prepared after the record of decision for the general management plan has been approved. We appreciate these and other suggestions received during the general management plan comment period on what should be included in the plan.

### **Issue 3: Improve Outreach, Including Providing Interpretive Programming in Spanish**

**Representative Comment 1:** I know there are ranger walks and programs in the park already, but many people over here [living in the south and east areas of Washington, D.C.] do not read the Washington Post, where they are listed, don't know how to get to the park or have no transportation, and wouldn't feel comfortable anyway. I've never seen any programs offered in Spanish. (rocr0935.007)

**Representative Comment 2:** Park signage could help cultivate new park supporters: [We] encourage the NPS to expand and enhance interpretive services to market this regional network of parks, and to include more educational signage relevant to the park’s many visitors who speak Spanish. Currently, the only signs in Rock Creek Park in Spanish are disciplinary (“no drinking” or “keep out”). The lack of signage in Spanish excludes a growing percentage of visitors from the benefits of interpretation, and misses the opportunity to cultivate a new generation of park users as park supporters. (rocr0323.004)

**Response:** The National Park Service already has an extensive outreach program with local schools to bring park programming into the schools and bring children into the park for hands-on activities. Six new staff positions for visitor contact, education, and interpretation are proposed in the action alternatives. These positions will substantially improve the ability of the National Park Service to provide outreach, taking park programming to people who cannot come to the park or who are not familiar with or may initially be uncomfortable in its setting.

The National Park Service recognizes that it needs to serve the area’s large Spanish-speaking population. The park currently is offering Spanish-language programming, and a bilingual interpretive exhibit is on display at the Nature Center. Park staff would welcome discussions on this subject. Interested individuals or groups should contact the superintendent’s office at 202-895-6000.

#### **Issue 4: Improve the Area around the Nature Center**

**Representative Comment 1:** Improve habitat around the Nature Center to attract birds. This is already partially underway, as a butterfly garden has been planted and a small “meadow” cleared. However, the latter is being rapidly invaded by non-native and some native forest trees, and will soon lose its open character unless it is more carefully managed. A small pond was a good addition, but needs a “bubbler” or “drip” to realize its potential to attract drinking/bathing birds. If this were provided, the location (near the paved trail and with ample benches) would be excellent for the less-active individual to sit and enjoy wildlife. The Nature Center has great potential to educate the public about bird migration, and perhaps interest a few of them in birdwatching or nature study as a hobby. (rocr3025.009)

**Response:** This level of detail is beyond the scope of a general management plan. These types of actions will be incorporated into the update of the park's natural resource management plan, which will be prepared after the general management plan is finalized.

#### **Issue 5: Authorize Canoeing and Kayaking on Rock Creek**

Approximately 20 comments identified canoeing and kayaking as a traditional activity on Rock Creek. Most of these comments were similar to Representative Comment 1, below. However, a several-page letter from American Whitewater (rocr3022.000) provided a detailed history of the use of Rock Creek for whitewater recreation and presented arguments for specifically including this recreation type in the general management plan as an authorized activity.

**Representative Comment 1:** I support American Whitewater and agree that the General Management Plan for Rock Creek National Park is woefully inadequate in addressing management of Rock Creek. The Plan should specifically authorize canoeing and kayaking in recognition that these activities are a traditional use of the Park and have been for at least 35 years. (rocr0611.000)

**Response:** American Whitewater provided an excellent administrative record demonstrating that canoeing and kayaking on Rock Creek is a traditional activity that has been occurring in Rock Creek Park for many years. This activity would continue in a manner similar to its historical use regardless of the management alternative that was selected. As a result, there was no need to address management of canoeing and kayaking on Rock Creek in the general management plan. A statement to this effect and a summary of the history of canoeing and kayaking on Rock Creek was added to the “Alternatives or Actions Eliminated from Further Study” in the final general management.

#### **Issue 6: Provide More Developed Facilities for Gardening and Recreation**

**Representative Comment 1:** I also have a vision that the neighbors can be enrolled in caring for Rock Creek Park by adding more community gardening, fitness facilities and child play facilities within the first 100 [feet?] of the border. (rocr1671.002)

**Response:** Few comments were received during scoping on the need to expand community gardens or provide fitness and child play facilities. Therefore, changing the park for these types of facilities was not included in any of the alternatives.

## NATURAL RESOURCES

### Issue 1: Improve Management of Water Quality

**Representative Comment 1:** The [Government of the District of Columbia, Department of Health, Environmental Health Administration, Bureau of Environmental Quality (BEQ)] recommends that any buildings that are constructed/remodeled in Rock Creek Park or in the Rock Creek Park watershed utilize low impact development (LID) to reduce increased imperviousness in the watershed. Some suggested design modifications include the installation of green roofs, creation of rain gardens and the use of vegetated swales.

The traffic studies did not find that within the Rock Creek watershed traffic would substantially decrease under any of the alternative. Automobiles within the watershed would still be releasing these pollutants, and while it is possible that some would be intercepted/filtered by vegetation, most of these pollutants would eventually enter Rock Creek, and it is unlikely that pollutant levels would be noticeably lower.

For the BMP practices [to prevent roadway runoff from entering Rock Creek], BEQ suggests that it be specified that native vegetation be used for ground cover and that the planting of riparian trees and no mow zone along portions of Rock Creek also be considered.

Best management practices should be implemented for mitigation of bacteria runoff at the U.S. Park Police substation and Edgewater. (rocr1736.003 and 009)

**Response:** The final general management plan was modified to include the intent to use low-impact development to reduce increases in areas of impervious surfaces in the watershed. The National Park Service will contact the Bureau of Environmental Quality, Washington, D.C. to discuss these types of actions.

The analysis in the draft plan considered that the stretch of Beach Drive close to Rock Creek would particularly affect water quality of the creek because its proximity would limit the potential for pollutants to be filtered out. However, we concur that as long as traffic remains within the Rock Creek drainage, there would be limited change in pollutant loading in Rock Creek. The level of impact was changed to negligible in the final environmental impact statement.

*Management Policies 2001* specifies that plantings in national parks be limited to native vegetation. The National Park Service has already implemented the recommendations for planting of riparian trees and establishing no-mow zones.

The final general management plan was changed to include a commitment to implement best management practices for control of bacterial runoff at the U.S. Park Police substation and Edgewater.

**Representative Comment 2:** The namesake river, Rock Creek, is regularly subjected to sewage overflows and urban runoff. It is a tragedy of the first order that the primary river in our Nation's Capitol is not better protected and that the Park Service is not doing more to recognize the problem and improve sanitation such that other recreation activities such as fishing and wading may be permitted in the Park. The Plan should specifically address the continuing issues of water qual-

ity and sanitation. The Park must develop a planning mechanism for improving water quality throughout the Park and restoring the creek for fish health and viability, as well as public health. (rocr0611.000)

**Response:** The National Park Service already has a plan and program for improving water quality in Rock Creek and its drainage. The National Park Service joined the Chesapeake Bay Program in 1994 and since then has been an active participant in this regional partnership to protect and restore the Chesapeake Bay and the entire watershed. In large measure, this involves controlling pollution, including sewage overflows and urban runoff. The National Park Service Chesapeake Bay Program Office coordinates the actions of NPS entities throughout the region, including Rock Creek Park.

In its implementation of the general management plan, Rock Creek Park will continue to work through existing structures and organizations to achieve water quality goals. These include the Class A standard for primary contact recreation that are assigned to Rock Creek by the District of Columbia Water Resources Management Division.

As a result of the February 2005 settlement of a lawsuit against the District of Columbia Water and Sewer Authority (WASA) by the United States and others over the discharge of sewage into the waters of the District of Columbia, the volume and frequency of sewage discharged into Rock Creek and its tributaries will be substantially reduced. The National Park Service assisted the Department of Justice with this case.

## **Issue 2: Improve Management for Birds and Birding**

**Representative Comment 1:** I am a birder and I wish that the needs of the birds, especially the migratory birds, would be noted and included in the park planning. Rock Creek is an very important flyway for migrating birds and with continued destruction of trees elsewhere it becomes even more critical to their survival. Specific procedures would include things like: 1) implementing more no-mow sections, 2) removal of the extensive overgrowth of burdock (whose burrs can catch and kill birds), i.e. in the maintenance yard 3) no additional buildings near the maintenances yard. (rocr0649.001)

**Representative Comment 2:** Recommendation: Develop a comprehensive plan to enhance habitat for birds (and other wildlife) which would include, at a minimum, removal of hazardous invasive plants (Burdock) and a start at removal of other invasives in areas most used by migratory birds, replanting of native species which provide food and shelter, protection of dead tree snags and appropriate timing and review of tree cutting, and identification and establishment of more no-mow areas in RCP. Coupled with this, the park must put into place rational and science-based oversight for management actions.

If need be, a technical committee of non-involved individuals could be formed to guide this planning. Tremendous expertise exists in the region, both within the government (NPS, USFWS, USGS) as well as within academia and NGOs to form such a group. Additionally, the training of volunteers to assist with removal of invasive plants and replanting efforts will probably be necessary due to resource and manpower limitations, and should be expanded. (rocr3025.006)

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**Representative Comment 3:** I would like to recommend that the Park Service use its own staff, which has considerable expertise, as well as employee experts from nearby agencies such as the Migratory Bird Specialists at the Patuxent National Wildlife Research Center to develop a comprehensive management plan for migratory and resident birds and their habitats in Rock Creek. And furthermore, to seek outside partners through the birding community to do such activities as remove invasive species and promote bird walks and so forth within the park. (rocr3105.006)

**Representative Comment 4:** Birdwatching is the most rapidly growing outdoor activity in the USA (according to a Fish and Wildlife Service 2002 report), while activities such as biking are declining. Yet the plan speaks of improving facilities for bikers, while no mention is made of birders.

**Representative Comment 5:** There is no specific mention of improving bird habitat nor of improving facilities for birdwatching. Rock Creek has a unique resource which is not adequately recognized by the Park's management and is virtually ignored in the draft plan. Even to consider building a new administration building in the maintenance yard (described in Claudia Wild's 1993 book on bird-finding in Washington) as "the best migrant trap in the city" and the "most important field habitat for migratory birds in DC" shows an amazing lack of awareness of the importance of this part of Rock Creek Park to migrants. While I recognize that this is not a preferred alternative, even to suggest it is frightening for what it reveals about the level of awareness by the individuals who developed the plan. In fact, this type of less-managed (i.e., less mowed and groomed) edge habitat found in the back of the maintenance yard is vital for bird feeding and resting during migration, and every effort should be made to increase this habitat in Rock Creek. There are many areas now regularly mowed which serve no specific recreational use and which could support small areas of native shrubs and forbs. (rocr0644.000)

**Response:** The final general management plan and environmental impact statement was modified to emphasize the importance of birds and birding and to include a commitment to protect and enhance habitat for birds. These changes included:

- Adding birding to the list of appropriate activities in 6 of the 12 management prescriptions that comprise the alternatives. These included the Administration/Operations Zone where vegetation management for other purposes inadvertently created high-value bird habitat. See table 2 and the associated text in the final general management plan.
- Modifying all of the action alternatives to include a commitment to enhance the management of park habitats for birds, and identifying of some of the actions that could be taken to achieve this goal.
- Providing the locations of some of the park's important bird habitat areas in the "Affected Environment" section and adding a commitment in this section to ensure their conservation and enhancement, regardless of the alternative selected in the final general management plan.

Additionally, the *Rock Creek Park Telecommunications Facility Environmental Assessment* (2003) identified in its preferred alternative that the National Park Service would seek funds to develop and implement a program to monitor the impact of the existing telecommunications facilities on migratory birds. The monitoring program will be developed in cooperation with the U.S. Fish and Wildlife Service, other agencies, and interested parties.

Following approval of the final general management plan, the park's natural resource management plan will be updated to identify specific locations and measures for bird management, including habitat enhancement.

### **Issue 3: Improve Management of Deer**

**Representative Comment 1:** Deer in the Park are rapidly becoming a nuisance species, devastating ground vegetation that is important for migrating and nesting birds and small mammals. Some method of controlling deer populations needs to be considered. (rocr2925.015)

**Response:** After the general management plan is completed, the National Park Service will update the park's natural resource management plan. A deer management plan and environmental impact statement currently are being prepared to determine the best approach for managing the deer population in Rock Creek Park.

### **Issue 4: Improve Management to Reduce Roadkill**

**Representative Comment 1:** The cost of allowing nighttime traffic is likely very substantial in terms of damage to wildlife. At the least, NPS should extend the weekend hours by keeping the gates closed on Friday and Sunday nights. That would expand recreational opportunities and give the wildlife a break for three nights per week instead of just one, at no additional administrative cost to the Park Service. (rocr2925.013)

**Response:** The park is closed at dark to recreationists. This will not be considered in the general management plan or the natural resources management plan.

### **Issue 3: Improve Management of Invasive Plants**

**Representative Comment 1:** We are particularly concerned with an issue that is not dealt with in the document - routine maintenance of the Park. There are several invasive species of plants and animals that are having a devastating effect upon many areas in and outside of the Park. (rocr1736.001)

**Response:** Consistent with *Management Policies 2001*, the National Park Service has a commitment and policies for managing invasive plant species. These are included in the park's natural resource management plan and will be implemented regardless of the management direction included in the general management plan.

### **Issue 4: Improve Management of Wetlands**

**Representative Comment 1:** Wetlands are critical habitat for many wildlife species. They are essential as breeding areas for amphibian populations in Rock Creek Park. What management plans are being considered in Rock Creek Park to offer greater protection to existing wetlands? In addition, are there areas in the Park where the conditions are appropriate for restoring wetland function? Has the National Park Service conducted a thorough investigation of all seeps and springs within Rock Creek Park as a critical step towards offering them additional protection from park development projects? (rocr0829.009)

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**Response:** The management of wetlands is included in the park's natural resources management plan, which will be updated following completion of the general management plan. The National Park Service has a complete inventory of all park wetlands, which most recently was updated as part of the ongoing U.S. Geological Survey Northeast Amphibian Research and Monitoring Initiative.

### **Issue 5: Improve Management of Forests, Including Trees in the Area of the H-3 Stables**

**Representative Comment 1:** The largest forest in the District of Columbia deserves greater attention. We are concerned that current operations sometimes impact the health of forest trees. Near the existing H-3 stables, for instance, the dead, standing white oak trees in the area where rubble and stable wastes are stored indicate some negative environmental impact. Has the NPS fully explored sites outside of the park where these materials could be stored without the obvious impact on park forest resources? (rocr0829.010)

**Response:** Management of the park's forests will be included in the park's natural resources management plan, which will be updated following completion of the general management plan. We appreciate being notified of the potential for concern at the H-3 area and will evaluate this area and take appropriate action.

### **Issue 6: Remove Obstructions to Fish Migration in Rock Creek**

**Representative Comment 1:** Construction of a fish bypass at the Peirce Mill dam would expand habitat for blueback herring, American eel, and alewife, important species for the health of Chesapeake Bay. This project has been in planning for many years. It should be undertaken as soon as possible. (rocr2925.014)

**Response:** This project currently is underway as part of the mitigation program for the Woodrow Wilson Bridge. The final general management plan and environmental impact statement was updated to describe progress on implementing the mitigation. Its effects are included in the cumulative impact analysis in the environmental impact statement.

## FUNDING AND PARTNERING

### **Issue 1: Impose a User Fee for Use of Automobiles in the Park**

**Representative Comment 1:** Why not make Beach Drive open only to those with EZ-Pass transponders (these are available for free in Maryland). You could then charge 10-25 cents a trip to drive on Beach Drive and use that money to build a bike trail system. This will cut travel on Beach Drive, provide a means to manage travel demand in the future, encourage sustainable commuter options and improve safety and accessibility for all! (rocr1434.007)

**Representative Comment 2:** Test the feasibility of a fee-for-use charge (for motorized vehicles only) during the A.M. and P.M. peak commuting hours in those portions of Beach Drive and Rock Creek Parkway south of Military Road where traffic volumes exceed the Level-of-Service E threshold. There is already strong precedent for such actions--the NPS charges user fees at many of its parks. Moreover, the technology exists to collect such fees unobtrusively, e.g., the

Dulles Tollway does so with transponders. The NPS could make appropriate exemptions available, such as for residents neighboring the park. (rocr3030.006)

**Representative Comment 3:** The volume of rush-hour traffic in the Park, coupled with the high speeds of vehicles in many sections of the Park at all times, cause severe damage to the value and visitor experience of the Park. The Park should explore charging fees for vehicular through traffic during rush hour. The costs to the Park of supporting this function are inappropriate to be borne by NPS and all those who wish to use the Park at the beginning and end of each day. (rocr0315.007)

**Response:** The National Park Service is not considering user fees for entry into the park as a part of this general management planning effort. The June 2004 traffic study conducted by the National Park Service demonstrated that some of the automobile travel through the park on Beach Drive on weekdays is not time effective. In these cases, the driver could have selected another route, most of which were outside the park, that would have reduced the trip duration. This suggests that some of the drivers who use Beach Drive do so for the aesthetic quality of the experience or as a form of recreation. It is not appropriate to impose fees exclusively on this group of recreational users.

## **Issue 2: Obtain Funding for a Trail through the Park from Federal Programs**

**From Senator Paul Sarbanes:** I am a strong proponent of bicycling and alternative transportation options and have worked very hard to establish and expand federal programs to help develop bicycle and pedestrian trails throughout this region and the nation. Indeed, I am leading an effort in the Congress to establish a new federal grant program to support the development of alternative transportation services for our national parks, wildlife refuges and other public lands. Known as the Transit in Parks Act or TRIP, the legislation would provide \$90 million a year in capital funds for transit projects, including rail or clean fuel bus projects, pedestrian and bike paths, or park waterway access, within or adjacent to national parks and other public lands. I would be pleased to work with you, the Washington Area Bicyclist Association, and other organizations to explore options for enhancing hiker-biker trails in Rock Creek Park and the greater Washington metropolitan area. (rocr2862.001)

**From Representative Eleanor Holmes Norton:** Although the NPS apparently dismisses the idea of creating a recreational trail beside or near Beach Drive as too expensive and difficult, I believe that my experience in getting federal funds for recreation trails in the District of Columbia proves otherwise. As a senior member of the Transportation Committee I was able to secure \$8 million in 1998 in Transportation Equity Act funds for the Metropolitan Branch Trail, a multi-use commuting and recreation trail that runs adjacent to the Metro Red Line from Union Station to Silver Spring. I have requested an additional \$10 million for the trail in this year's reauthorization of the Transportation Equity Act. Working with other regional members of Congress and the Park Service, I believe that adequate funding could be achieved that would allow for the construction of an environmentally friendly adjacent recreation trail that conforms to the historical integrity of the park and Beach Drive. (rocr2971.004)

**Response:** The 1980 and 1990 studies that recommended constructing a continuous paved recreation trail through the valley were not supported by any actual data on the practicality of such an action. Early in the general management planning effort, field investigations were conducted by

## NEW ACTIONS OR ELEMENTS

NPS landscape architects, natural resource specialists, and civil engineers; representatives of the U.S. Fish and Wildlife Service; and the District of Columbia State Historic Preservation Officer. The investigations determined that there are multiple, severe impediments to trail construction along Beach Drive north of picnic grove 10 and in the area between Joyce Road and Broad Branch Road.

Bicycles are classified as vehicles and are legally entitled to use public streets (District of Columbia Code of Municipal Regulations, Title 18, Chapter 12, 1200.3). As a result, a trail through the valley would not necessarily separate recreationists from motorized vehicles or move bicycles out of the traffic stream, because bicyclists may choose to use the roadway rather than a paved trail.

Based on physical, cultural resource, and biological resource considerations, construction of a continuous, paved trail in the Rock Creek valley was judged to be impractical. Therefore, it was eliminated from consideration as a component of any of the alternatives in the general management plan.

This conclusion could be reevaluated in the future during, for example, preparation of the trail plan for Rock Creek Park. If needed, an amendment to the general management plan would be prepared to accommodate the change in park management.

### **Issue 3: Obtain Funding from Other Sources**

**Representative Comment 1:** The Park should identify avenues for the Park to benefit from sales of appropriate interpretive materials, fees for audio tours and other programs, and concessions that could enhance the visitor experience such as bike rental, refreshments, and natural gas-powered trolley loop tours of the Park. (rocr0315.006)

**Response:** These actions are beyond the scope of the general management plan. However, they will be considered in the interpretive plan, concession plan, and other plans that will be prepared after the general management plan is approved.

**Representative Comment 2:** Design and build a display featuring bird migration. This might be an excellent project for which to seek outside funding or donations from a bird club or naturalist group. (rocr3025.011)

**Response:** This level of detail is beyond the scope of the general management plan. These types of analyses will be considered in the interpretive plan that will be prepared after the general management plan is approved.

### **Issue 4: Maximize the Use of and Benefits from Partnerships**

Under the heading “Connected, Cumulative, or Similar Actions,” many commenters suggested organizations with which the National Park Service should be working to enhance the operation of Rock Creek Park. Other comments encouraged the National Park Service to partner with the community, but offered no specifics. The following comments included details regarding partnerships.

**Representative Comment 1:** The NPS should prepare a comprehensive interpretive plan to identify and work with community partners to assess and develop interpretive and stewardship programs for significant geological, ecological, and cultural sites throughout the park. It is critical that the interpretive plan be integrated into the GMP, so that . . . every program in the Park will advance a broad-based, active, permanent constituency to stand up and help the park, such as those that help other major urban parks across the nation. Finally, the comprehensive interpretive plan should develop options for working with community partners to develop interpretive programs and products and to advance permanent community-based park advocacy, partnership, and conservancy. (rocr0315.003)

**Response:** The National Park Service typically prepares an interpretive plan shortly after the general management plan for a park is completed. Such a plan will be prepared for Rock Creek Park after the record of decision for the general management plan has been finalized. We appreciate these suggestions on what should be included in the plan.

**Representative Comment 2:** The GMP provides no guidance or direction for park management to use in developing partnerships with other governmental and non-governmental entities. To offset inadequate Federal resources, to encourage support for Rock Creek Park, and to increase involvement in its future, [our organization] urges the establishment of a wide range of public-private partnerships. Such partnership have produced excellent results for many communities and national parks throughout the nation, such as Golden Gate National Recreation Area in San Francisco; Gateway NRA in New York City; and Cuyahoga Valley National Park between Akron and Cleveland, Ohio.

The Washington DC area offers a rich array of possible partnerships to benefit Rock Creek. These could include:

- a) Agencies. Partnerships with local (e.g., DC Parks and Recreation, Schools, DDOT), state (MD, VA), and federal agencies (EPA, USDA etc.) to share resources, outreach, communications, cross training, amid joint programs;
- b) Conservancy. Creation of a Rock Creek Conservancy to support fundraising, promotion, and partner programs for the park;
- c) Advisory Committee. Establishment of a citizens advisory committee to advise on matters relating to all the national park units located within Washington, DC; and,
- d) Universities and Schools. Cooperative agreements with local universities and schools for research, study, and support of park programs. (rocr3030.015)

**Response:** Information on coordination with friends and partners and a list of the organizations with which Rock Creek Park currently has cooperative relationships was added to the final general management plan under the heading “Connected, Cumulative, and Similar Actions.” Some of these relationships are formalized through contracts or memoranda of understanding but most are based on common goals.

All alternatives will provide opportunities for partnerships. The National Park Service will continue to work with its partner organizations in areas of mutual interest and will support the crea-

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tion and nurturing of other partnerships to address natural, cultural, and recreation resources within the park and on an area- or region-wide basis.

### **INCLUDE OTHER ACTIONS AS PART OF ALTERNATIVES IN THE GENERAL MANAGEMENT PLAN**

#### **Issue 1: Prohibit Cell Towers**

**Representative Comment 1:** Prohibit cell towers: The towers that have been placed in the park were extremely controversial, and led to a court suit challenging their environmental impacts. The presence of these towers has already had a deleterious impact on the scenic qualities of the park, and no further towers should be permitted. This should be addressed in the final GMP and federal legislation. (rocr3030.014)

**Response:** Under federal law, companies have the right to apply to place their telecommunications facilities on federal land, which includes park lands such as those administered by the National Park Service. The National Park Service must consider these applications for the use of park lands, and possibly permit this use. This process is spelled out in detailed NPS policy guidance that must be followed.

As a result of the lawsuit that was referenced in this comment, the National Park Service performed a second environmental assessment pursuant to the National Environmental Policy Act (NEPA), concerning the current telecommunications facilities located in Rock Creek Park. From that process, the National Park Service made a finding of no significant impact (FONSI) and decided to conduct a study on the effects of telecommunications like these at additional facilities. The National Park Service will use what it learns from these studies as it considers future applications and in making other related decisions.

#### **Issue 2: Restore the Peirce Mill to Full Operational Capabilities**

**Representative Comment 1:** I would like to urge restoration of Pierce Mill which I used to visit frequently when it was a working mill. (rocr0699.002)

**Representative Comment 2:** Peirce Mill rehabilitation, maintenance, operation. This historic landmark was once a working, demonstration mill under NPS stewardship. Any GMP needs to fully explore costs and benefits of full restoration and continuing efforts thereafter. (rocr2988.001)

**Response:** The National Park Service recently completed a draft historic structures report for Peirce Mill. This draft document is a professional analysis of the structure and surrounding areas that examined a complete range of management approaches, including restoration of the mill to operations.

The recommendation from the report, which will be implemented by the National Park Service, is to rehabilitate Peirce Mill to provide a historically accurate representation of a typical mill complex in the region. This will include restoring the milling machinery to a fully operable condition. However, because the mill race was relocated away from the site many years ago, it will not be

possible to restore operation of the mill using water power. The landscape of the complex will be rehabilitated to retain the historic character while allowing continued use. The final general management plan was revised to better clarify the upcoming action for Peirce Mill.

### **Issue 3: Provide Interpretive Programming at Edgewater**

**Representative Comment 1:** To better connect to DC's densest and most diverse populations, as well as to one of the prime areas where tourists enter the Park, the Park should re-establish public use of at least part of Edgewater Stables, as a base of interpretive programming for the lower Park.

**Response:** Prior to implementing any major changes in programming, the National Park Service will prepare an interpretive plan, which will tier from this general management plan. In preparing the plan, the National Park Service will consider all of the suggestions from the public related to interpretive programming that were received as comments on the draft general management plan. Using the Edgewater area as a base of interpretive programming for the lower park was added to the final general management plan as an action that will be considered in the development of the interpretive plan.

### **Issue 4: Allow Use of Mountain Bikes off of Paved Surfaces**

**Representative Comment 1:** The bikers do need mountain bike trails, you can see this by the everyday use of the restricted horse trails by bikers. (rocr0686.004)

**Response:** Page 36 of the draft general management plan addressed the continuing prohibition of bicycle use off currently permitted roads and trails. No change was made in the final document.

### **Other Suggestions That Were Not Addressed in the General Management Plan**

The general management plan was not changed to address the following suggestions. Some of these would either apply to lower-tier planning, are contrary to current NPS policies, or apply to sites that are not under NPS jurisdiction. However, all of these suggestions were entered into the database that will be consulted as plans that tier from the general management plan are prepared.

- Regulate the Carter Barron parking lot, which often is used as a training area by people who are just learning how to drive a car.
- Establish a dog park. The recommended area is Military Field, which the commenter claims is not mowed regularly and is very hilly and uneven, making it less than ideal for any recreational use except free style dog play.
- Fix or provide additional public toilets and/or water fountains.
- Locate lavatories on the same side of the road as picnic facilities, which would lower traffic impact on visitors.

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- Install additional signs along Rock Creek that warn of the human dangers in consuming bottom-feeding fish because of toxic contamination.
- Restore and improve the riding stables, and increase horseback riding offerings to District children because this is a particularly important experience for urban children.
- Improve the golf course facilities.
- Include the U.S. Park Police substation in the proposed Rock Creek Park Visitor Center. (NPS note: the only new visitor contact station proposed in the general management plan is in the Lodge House, which currently houses the U.S. Park Police District 3 substation and is too small for its current function.)
- Restrict the use of SUVs and other large vehicles on Beach Drive.
- Reopen Klinge Road.
- Keep Klinge Road closed.
- Install more pull-offs like the ones between Broad Branch and Military Road. This would enable people with impaired mobility to use the pull-offs to look at the creek and enjoy the park.
- Mitigate the huge error in planning that allowed the installation of an interstate-scale interchange and bridge where Klinge Road meets Porter Street, which resulted in the loss of the historical character of the area. Partial mitigation would occur if the highway lights were removed and the surrounding lawn encouraged to revert to woodland and meadow - immediate tree planting could start this process.

## AFFECTED ENVIRONMENT

Many commenters on this section described the park's resources in very general terms or stated their belief that the description of the existing condition for one or more of the impact topics was inadequate without providing substantiation. These types of comments were classified as non-substantive and were not included in this document.

Comments that offered specifics on why the existing information could be considered inadequate, made corrections, or provided additional information that might be useful in the final general management plan are addressed below.

### AIR QUALITY

#### **Issue 1: Include More Current Data**

**Representative Comment 1:** It is the opinion of the [Government of the District of Columbia, Department of Health, Environmental Health Administration, Bureau of Environmental Quality (BEQ)] that data validity is a concern and requires justification. The use of a seven (7) year old air quality monitoring data casts doubt whether the modeling prediction would actually capture current air quality conditions in the Rock Creek Park environs. A similar argument can be made in the adoption of a 1990 Average Daily Traffic Volume in the projection of CO vehicular loadings for the year 2020. (rocr1736.002)

**Response:** More current air quality monitoring information was obtained from the Air Quality Division of the District of Columbia, Department of Health. The air quality analysis for sites outside the park was updated with the most recent traffic counts available (from 2001) from the District of Columbia Department of Transportation. Air quality analyses for sites in the park used traffic counts from a traffic conducted by the National Park Service in June 2004. The text of the final environmental impact statement was revised to include the latest available data.

#### **Issue 2: Address the Health Effects of Ozone and Nitrogen Oxides**

**Representative Comment 1:** [We] request that the language in the draft contain an up-to-date acknowledgement of the public health impacts of polluted air. Since the draft was written, the Metropolitan Washington area has been downgraded to "severe" noncompliance with the one-hour ozone standard required by the Clean Air Act. People of all ages in the metropolitan area struggle with asthma and other respiratory problems due to nitrogen oxide and volatile organic compound pollution. The most recent emissions inventory indicates that cars and trucks are responsible for 45% of the NOx emissions and 30% of the VOC emissions. The next draft should include these facts. (rocr0829.005)

## AFFECTED ENVIRONMENT

**Response:** The “Affected Environment” section for air quality was updated to reflect current conditions. Pages 117 and 118 of the draft general management plan and environmental impact statement described the region’s status as a non-attainment area for ozone.

Nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOCs) are not addressed in the general management plan because these compounds are not among the six principal pollutants, called "criteria" pollutants, that are regulated by the National Ambient Air Quality Standards (NAAQS). The NAAQS include nitrogen dioxide, which is a component of the nitrogen oxides. However, the Washington, D.C. metropolitan area has been in compliance with the nitrogen dioxide standard for many years.

### **Issue 3: Acknowledge Vehicle Emissions as a Source of Air Pollution**

**Representative Comment 1:** Seventy percent of D.C. commuters drive to work alone, that’s one person per car. This is the single largest contributor to D.C.’s horrendous air quality problems. We’re in severe nonattainment category for ozone air pollution. Each summer we face too many code red days and last summer we even discovered that there’s a worse air quality category which is code purple. (rocr3113.004)

**Response:** Identification of vehicle emissions as the primary source of air pollution was added to the final general management plan and environmental impact statement.

## **ROCK CREEK AND ITS TRIBUTARIES**

### **Issue 1: Text Should Be Corrected**

**Representative Comment 1:** Page 119 - Last paragraph. The last sentence indicates sources of high bacteria concentration in upper Rock Creek. Recent bacteria source tracking investigation (ongoing D.C. Department of Health study) has shown elevated bacteria levels from ‘livestock’ immediately downstream the stable facilities. Include horse stables as sources. Include this source also on page 123 in list of point and nonpoint sources of water pollution.

Page 120 - Second paragraph. The volume of combined sewer overflow is incorrectly stated as being 42.5 million gallons during a 1 hour storm. It is 49 million gallons per average year.

Last paragraph - Replace “The District of Columbia Water Resources Management Division ...” by " The District of Columbia, Department of Health ...” (rocr1736.010)

**Response:** These changes were made in the final environmental impact statement.

### **Issue 2: Include More Current Data**

**Representative Comment 1:** In general, the document does not make use of updated information. For example, the findings of the document entitled “Water Quality, Sediment Quality and Stream-Channel Classification of Rock Creek, Washington, D.C. 1999-2000”, prepared by the U.S. Geological Survey, in cooperation with the National Park Service, has not been used. In ad-

dition, the D.C. 305(b) report used is dated 1996 while 1998, 2000 and 2002 reports are available. (rocr1736.010)

**Representative Comment 2:** Page 120. 2nd full paragraph, beginning: “The Washington, [sic] D.C. Water and Sewer Authority (WASA) estimates ...” is way out of date and incorrect. Please check with DC WASA to update. (rocr3029.002)

**Response:** The final environmental impact statement was updated to include information from current sources. The name of this agency also was corrected to District of Columbia Water and Sewer Authority.

### **Issue 3: Expand Management History of the Rock Creek Watershed**

**Representative Comment 1:** Rocr0370.000 provides a detailed description of the management history of the Rock Creek watershed, based both on the author’s personal experience and on the *Guide to the Records of the Rock Creek Watershed Association, 1949-1959* (Record Group 18: Civic Organizations, July 24, 1997, Montgomery County Archives).

**Response:** While this comment provided historical information and will be retained by the park as part of the historical record, it did not result in any changes in the text of the environmental impact statement.

### **Issue 4: Use Macroinvertebrate Data to Characterize Water Quality**

**Representative Comment 1:** Pages 119 *et seq.* describe Rock Creek and its tributaries. I have been an active member of a water quality monitoring team associated with the Audubon Naturalist Society on the Pinehurst Branch of Rock Creek for over six years. During that time, we have documented the relatively poor quality of the water in Pinehurst Branch by examining macroinvertebrates in the stream. I urge the Park Service to obtain the data and analysis from ANS to document the water quality conditions in Pinehurst Branch. (rocr2901.007)

**Response:** Water quality conditions as indicated by macroinvertebrate populations is a greater level of detail than is generally employed to develop a general management plan. The Audubon Naturalist Society information will be considered during the development of more detailed plans, such as the natural resources management plan.

### **Issue 5: Characterization of the Existing Condition Is Inaccurate**

**Representative Comment 1:** I do not agree with the draft’s conclusion that water quality concerns in Rock Creek have “stabilized.” No data is provided to support this conclusion. In fact, the assessment of conditions in Montgomery County found the section of Rock Creek south of Rockville to have fair to poor stream and habitat conditions. “Bank stability problems and high levels of sediment deposition impair the biological community,” is how the county’s Department of Environmental Protection characterizes the watershed just upstream of the District line. (rocr0829.006)

## AFFECTED ENVIRONMENT

**Response:** The term “stabilized” does not indicate that the water quality is good. It only indicates that conditions are not getting noticeably worse or better. The supporting data are provided in the District of Columbia 305(b) reports from 1998, 2000, and 2002 and the NPS’ (1994) *Baseline Water Quality Data/Inventory and Analysis – Rock Creek Park*. Together, data in these reports indicate that over the past decade the water quality in Rock Creek generally has exhibited little change. The final environmental impact statement was updated to include the most current water quality data.

### **Issue 6: Include Hydrology Information Relevant to Canoeing and Kayaking**

**Representative Comment 1:** Unlike other regional tributaries to the Potomac, such as Difficult Run in Virginia, the whitewater on Rock Creek is of moderate difficulty. The creek is not particularly dangerous, and most of the rapids on the creek are rated Class I-II on the international scale of difficulty, with a couple of Class III drops located immediately downstream of the Rock Creek Ranger Station. Depending on water level, the waterfall created by the dam at Peirce Mill ranges from Class III-V. The creek is generally runnable in the immediate hours after a thundershower or for 1-3 days after an extended rainstorm. (rocr3022.003)

**Response:** An excerpt of this information was added to the “Alternatives or Actions Eliminated from Further Study” section of the final general management plan in the explanation of why canoeing and kayaking would continue regardless of the management alternative selected.

### **Issue 7: National Park Service Needs to Partner with Others**

**Representative Comment 1:** [We are] concerned with the poor status of aquatic biodiversity within Rock Creek Park. And we are aware that this is largely due to inadequate and inappropriate water management upstream in the watershed. We are not content with the level of pollution contributed to the Potomac and the Chesapeake by Rock Creek. We urge NPS partnership with NCPPC and local government agencies. (rocr3139.005)

**Response:** The National Park Service will continue to coordinate with numerous organizations and agencies throughout the watershed to improve the quality of water in the drainages that enter Chesapeake Bay, including Rock Creek. As a result of the February 2005 settlement of a lawsuit against the District of Columbia Water and Sewer Authority (WASA) by the United States and others over the discharge of sewage into the waters of the District of Columbia, the volume and frequency of sewage discharged into Rock Creek and its tributaries will be substantially reduced. The National Park Service assisted the Department of Justice with this case.

## WETLANDS AND FLOODPLAINS

### **Issue 1: Provide More Information on Wetland Planning**

**Representative Comment 1:** What management plans are being considered in Rock Creek Park to offer greater protection to existing wetlands? In addition, are there areas in the Park where the conditions are appropriate for restoring wetland function? Has the National Park Service conducted a thorough investigation of all seeps and springs within Rock Creek Park as a critical step towards offering them additional protection from park development projects? The protection of

our water resources is a primary focus for our organization. I would very much appreciate it if you would inform me of specific projects, the schedule for implementation, and the budget for future improvements pertaining to water quality. (rocr0829.009)

**Response:** The management of wetlands is included in the park's natural resources management plan, which will be updated following completion of the general management plan. The National Park Service has a complete inventory of all park wetlands, which most recently was updated as part of the ongoing U.S. Geological Survey Northeast Amphibian Research and Monitoring Initiative

## DECIDUOUS FORESTS

### Issue 1: Text Should Be Corrected

**Representative Comment 1:** Paragraph that begins "An inventory of park vegetation..." The lead author of that flora (Peggy Fleming) left a list of 150 species of plants that she could not find that historical records indicated were in the park at some point. These five species were only examples of the better known and popular plants from that list. It is probably safe to say that there are more than 100 plants missing from 1995 flora that were in the park at the turn of the century (Peggy's suggestion and mine). (rocr2980.007)

**Response:** This comment was confirmed and the final environmental impact statement was revised.

### Issue 2: Control of Invasive Species is Inadequate

**Representative Comment 1:** Currently invasive nonnative plants (INPs) are being controlled in only a small area of the park. Unless they are controlled over the entire park, INPs will continue killing trees in all layers of the canopy, irreversibly altering the ecosystem, especially along the floodplain. Some INPs also alter the soil chemistry, making it difficult for native species to repopulate areas even after the nonnatives are removed. Norway maple, for example, puts chemicals into the soil that inhibit growth by any other species. Since they were planted along 16th St., they have spread into the forest. In the neighborhood of Holly Drive, there are few other species except Norway maples for several hundreds of feet downslope of 16th St. INPs can change the water table, making soils too dry or moist for natives to use. Invasive, nonnative shrubs and herbaceous plants frequently form thickets so dense that wildlife, especially amphibians and birds, cannot penetrate it or get stuck if they do. (rocr2980.006)

**Response:** As noted in the draft plan and environmental impact statement, insufficient funding limits the ability of the National Park Service to effectively manage invasive plant species. The level of information on invasive species in the draft environmental impact statement was adequate to support the characterization of impacts that would result from the implementation of the alternatives. No changes in the text on invasive species were made based on this comment. However, the information in this comment may be useful in the preparation of the updated natural resources management plan following approval of the general management plan.

### **Issue 3: Provide More Detail on Deciduous Forests**

**Representative Comment 1:** There appears to be an assumption that the forests of the Forest Zone are largely undisturbed. This is not correct. These forests are a remnant of the original forest in the area and they are very important, much more significant than you have indicated in your Plan. They are, however, highly disturbed.

You have recognized that there are different kinds of deciduous forests (associations), but you have not recognized their significance, so talk only in generalities. (rocr3018.005)

**Representative Comment 2:** The almost-mature forests are in the mid- to later successional stages. All deciduous species are just reaching maturity, except the remnant individuals that are truly old. The tulip poplar association and the beech-tulip poplar variant of beech-white oak forests are indicative of mid-seral stages, while the beech-oak, mixed oak-beech, and chestnut oak are closer to late stages. In all cases the beech, which indicates late seral stages, is still within the sub-canopy and has yet to reach the highest canopy. (rocr2980.007)

**Representative Comment 3:** The closure will help preserve Rock Creek Park that serves a vital purpose for all of us living in Washington, D.C. I learned something about the importance of urban trees for a film script I had to write --"The Forest Where We Live" (Produced by LPB and aired on PBS a few years ago). In making the film, we traveled and filmed all over the country-- Illinois, Wisconsin, New York, District of Columbia, California, Georgia, Louisiana, Texas and elsewhere.

Scientists have only recently been studying the impact of urban trees on the quality of life for major cities like Washington, D.C. The first one was done in Chicago at the request of the current Mayor Daley and as a result, led to a major emphasis on preserving Chicago's trees and to breaking up the city's concrete to plant more. The trees around us reduce pollution, curb flooding, reduce damage from wind, and keep cities cooler in the summer and warmer in the winter. They also improve the quality of life for all of us and enhance a sense of beauty around us and feelings of psychological well-being.

The emphasis on city parks, bicycle paths, and open spaces stems, in part, from that fact that our national parks (Yosemite and others) are currently overwhelmed. Many leaders and others have concluded that we must preserve the trees, parks, and open spaces in the urban areas where we live. That's no mean feat since city trees have shortened lives from exhaust fumes, traffic accidents, overzealous utilities firms (just look at the wild way they prune trees for utility lines), and cramped root conditions.

We saw what could happen if you do not take steps like this closure. That's what happened in Atlanta from unregulated development and heavy traffic conditions like those currently affecting Rock Creek Park. By the late 1990s, Atlanta, Georgia (once famed for its trees) had lost more than 70% of its trees in the last 20 years and now suffers from heat (remember the problems with heat at the Olympics?), flooding and increased air pollution.

Deforestation, we learned, is not just a major problem here in the states; millions of acres of trees are being lost every year in America. Big corridors of development like that which affected Atlanta can be seen between here and Baltimore, or northwards up route 270 towards Germantown.

Rock Creek Park is our bulwark against the problems from these corridors of development that have undermined other cities in recent decades.

Henry Diamond, a Washington lawyer who worked with Lawrence Rockefeller during the LBJ Administration to push through some 64 pieces legislation, has called for more attention to the problems of unregulated development in his important book, *Land Use in America*.

The conflict between commuters/developers and the environment doesn't have to be. We found, in a number of cities throughout the country, foresters and commuters/developers working hand in hand to assure both development and the preservation of trees and open spaces. Your proposal is in line with these kinds of progressive and forward looking actions. It should be supported wholeheartedly by Washingtonians. (rocr1692.002)

**Response:** The level of information in the draft environmental impact statement was sufficient to support the characterization of impacts on deciduous forests that would result from the implementation of the alternatives. No changes in this section were made based on these comments.

## **PROTECTED AND RARE SPECIES**

All of the "Affected Environment" comments received concerning protected and rare species were focused on birds and are included in the comments on "Other Native Wildlife."

## **OTHER NATIVE WILDLIFE**

### **Issue 1: Provide a Deer Management Plan**

**Representative Comment 1:** Pages 131 et seq. discuss deer and other mammals as a problem because of roadkill. Deer populations are becoming a problem in the Park for other reasons. First, the rapidly growing deer population is devastating the brush-shrub and ground vegetation in much of the Park and adjacent neighborhoods. This vegetation is important for migrating and nesting birds, small mammals, and other species. In the Shenandoah National Park, researchers demonstrated that heavily deer-grazed areas had poorer quality habitat for many species than areas where the deer population was excluded or reduced.

The Draft General Management Plan should describe the deer population and develop reasonable carrying capacity estimates for deer relative to other important components of the ecosystem. I realize that all of the deer's natural predators are gone and that hunting in National Parks is against the law. Nevertheless, under the circumstances of this highly-urbanized park, the Park Service should consider population control measures for deer in the Park. If you don't implement such a program, at some point many deer will die of disease, starvation, and/or as roadkills. (rocr2901.008)

**Response:** Updated estimates of deer population numbers were added to the final environmental impact statement. A deer management plan and environmental impact statement currently are being prepared to determine the best approach for managing the deer population in Rock Creek Park. This plan will be included the updated natural resources management plan for the park.

**Issue 2: Include Information on Birds**

This issue was the subject of several long letters, some of which provided extensive information on bird numbers and locations. The level of detail was too great to use in a general management plan, but the data will be retained and consulted when the National Park Service prepares the bird management elements of the updated natural resources management plan for the park.

**Representative Comment 1:** Rock Creek Park is one of the premier locations for observing migratory birds. This is especially true in the areas of the nature center, stables, maintenance yard, and picnic areas 17/18. Any future plans for the park should include maintaining this environment for both the birds and those observing them. (rocr0712.001)

**Representative Comment 2:** Because there is no detailed overview of birds, migrant or otherwise, there is no discussion of how park habitat problems affects migrant or breeding birds (invasive plants, deer over-grazing, etc.). Nor is there any comprehensive plan on enhancing park habitat for birds and addressing factors affecting their survival, problems which in some cases are exacerbated by inappropriate management activities. (rocr3025.005)

**Representative Comment 3:** I find the draft management plan inadequate because it does not recognize, much less discuss it in any length, the importance of Rock Creek Park to migratory birds. Over 180 species of birds, including all the northeast warblers, flycatchers and thrushes have been recorded in Rock Creek Park in the past decade, as well as numerous species such as hummingbirds, swallows, jays and other migrants. Some species are found in extremely high numbers which rival internationally migratory hotspots such as Cape May and Point Pula in Ontario. Rock Creek is locally the top migrant hotspot in the D.C. area.

This twice yearly movement of hundreds of thousands of birds through Rock Creek Park is a wonderful natural phenomenon and one of our city's nation treasures. It is recognized nationally and noted in several books, including the new American Birding Association Guide to Birding in American Cities. On any given day at the peak of migration there are scores of birders in the park and they represent a major park user group which is hardly mentioned in the management plan.

I have three points to make.

Because of the importance of the park to migrate birds is not recognized, there is obviously nothing in the plan about managing for these species or their habitats. The plan lacks any discussion of habitat preferences for migrants, their needs for food or shelter and how habitat within the park could be enhanced for them.

Secondly, the Rock Creek draft management plan needs to recognize the importance of migratory birds both as natural values of the park and their value to a large and growing segment of park visitors. The U.S. Fish and Wildlife Services recognized bird watching as the most rapidly growing outdoor activity in the nation and is growing more rapidly than, for example, bicycling. No offense to the bicyclists.

Materials should be provided to enhance the display of migration of birds. A park bird list is being prepared by the sightings board of the nature center which could note all interesting sightings in a display on bird migration at the center should be considered.

Third, and this is very important, the National Park Service should ensure that appropriate in-house or outside experts when necessary review and clear all management actions within the park which could impact living resources including birds. Right now I feel that there is sometimes a discount between the input from the national resources staff and the management of the park. Mrs. Rachlin in an earlier testimony talked about cutting down of dead trees. I actually examined some of those dead snags that were cut down. They contained active woodpecker borings and could very well have contained nests which went through the chipper. (rocr3105.001)

**Representative Comment 4:** The Audubon Naturalist Society and others have been conducting wild bird surveys, nesting breeding bird surveys in the area around the maintenance yard for 40 or 50 years. It's one of the longest running breeding bird surveys in the country. (rocr3121.002)

**Representative Comment 5:** I identify three major problems with the Draft Management Plan:

1) The biological data presented on birds is inadequate, despite the considerable amount of information provided in recent years to NPS and to the RCP management on both migratory and resident birds by scientists and naturalists. Recommendation: The NPS should completely rewrite the section relating to birds, both migratory and resident, and utilize information readily available to it (or already in its possession). Emphasis should be on migratory and breeding species. As an aside, many of the RCP naturalists have considerable expertise and could undoubtedly perform this function if given time and resources, or it could be done by an employee of Patuxent Wildlife Research Center which has a large migratory bird office.

2) Because there is no detailed overview of birds, migrant or otherwise, there is no discussion of how park habitat problems affects migrant or breeding birds (invasive plants, deer over-grazing, etc.). Nor is there any comprehensive plan on enhancing park habitat for birds and addressing factors affecting their survival, problems which in some cases are exacerbated by inappropriate management activities. There also needs to be a reduction of mowed areas, as has occurred in the Maryland sections of RCP. In the Washington sector of RCP, there are many areas regularly mowed which receive little or no use by the public and would be far better left to regrow native vegetation for the benefit of birds and in fact, all the park's wildlife. Further, meadows should be managed to enhance growth of native wildflowers and other forbs, not only summer grasses, which would require mowing areas by rotation. This does not now occur, and "no-mow" areas such as that at Military Field are primarily grass which is of limited wildlife value.

3. The draft plan barely mentions birdwatchers as a user group, and thus contains no suggestions to enhance the park experience for them. The park also is missing a unique opportunity to educate park visitors about the phenomenon of bird migration, which is taking place around them every year. While this might not be as basic an issue as the first two, some rather low-cost actions could greatly enhance the park experience for birdwatchers and other nature lovers. Since birds are one of RCP's most unique natural resources, birds should form a more important focus of park activities and public outreach. (rocr3025.000)

**Response:** the final general management plan and environmental impact statement was modified to emphasize the importance of birds and birding and to include a commitment to protect and enhance habitat for birds. These changes included:

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- Adding birding to the list of appropriate activities in 6 of the 12 management prescriptions that comprise the alternatives. These included the Administration/Operations Zone where vegetation management for other purposes inadvertently created high-value bird habitat. See table 2 and the associated text in the final general management plan.
- Modifying all of the action alternatives to include a commitment enhance the management of park habitats for birds, and identifying of some of the actions that could be taken to achieve this goal.
- Adding information on the importance of the breeding bird survey area.
- Providing the locations of some of the park's important bird habitat areas in the "Affected Environment" section and adding a commitment in this section to ensure their conservation and enhancement, regardless of the alternative selected for implementation.

Additionally, the *Rock Creek Park Telecommunications Facility Environmental Assessment* (2003) identified in its preferred alternative that the National Park Service would seek funds to develop and implement a program to monitor the impact of the existing telecommunications facilities on migratory birds. The monitoring program will be developed in cooperation with the U.S. Fish and Wildlife Service, other agencies, and interested parties.

Following approval of the final general management plan, the park's natural resource management plan will be updated to identify specific locations and measures for bird management, including habitat enhancement.

## ARCHEOLOGICAL RESOURCES

### **Issue 1: Archeological Resources Information Is Incomplete**

**Representative Comment 1:** Protecting Intrinsic Park Resources: We believe that Rock Creek Park would be best served by a comprehensive approach to identifying and managing its intrinsic resources (including historic/cultural and archeological resources). The GMP information on these resources is incomplete and hard to use. Additional studies are needed to complete the strategic direction of the GMP and responsibly move to taking action.

Cultural Resources. Complete the inventory of cultural landscapes and a survey of archaeological resources. (rocr3030.010)

**Response:** Data in the general management plan are highly summarized, but are adequate to support the evaluation of impacts that would result from the four park management alternatives. The general management plan was updated to reflect progress on a four-year archeological identification and evaluation study of the park that is now in its second year.

## HISTORIC RESOURCES AND CULTURAL LANDSCAPES

### Issue 1: Clarify Management Approach for Peirce Mill

**Representative Comment 1:** The various alternative plans presented in the GMP are virtually identical in their references to Peirce Mill. However, the report fails to mention that the objective of the project is to restore the mill to operation. For example, on page 99 it says: "The mill would be managed consistent with the recommendations of a historic structure report, currently nearing completion. The mill would provide demonstrations of the historic milling industry in the valley." And again in Table 6 on page 108 the reference to the mill states "Rehabilitate the mill to focus on history of milling and land use in the Rock Creek area". While it is true that the HSR presents a plan which would indeed restore the mill to operation, we would like to see a specific statement that the ultimate objective is an operating mill. Such a statement would reassure our members and our donors that the Park is committed to an operating rather than a static demonstration of milling -- a "living museum of milling". (rocr1581.001)

**Representative Comment 2:** While the GMP budgets \$1.73 million in capital costs for Peirce Mill, this is insufficient funding to restore full operation of the mill. When restored again to operation, the Mill can serve as an outstanding example of one of the earliest industrial processes. Peirce Mill is a key cultural resource in Rock Creek Park and a popular visitor site since its restoration in 1935. Although the Rock Creek Park staff developed an educational program for schools entitled Milestones to Millstones, the milling machinery has not been repaired since it failed in 1993. (rocr3030.011)

**Response:** Peirce Mill management is not a component of the general management plan. The approach for managing this facility has already been determined and would not change regardless of the alternative selected in the general management plan.

As noted in the draft general management plan, the National Park Service recently completed a draft historic structures report for Peirce Mill. This draft document is a professional analysis of the structure and surrounding areas that examined a complete range of management approaches, including restoration of the mill to operations.

The recommendation from the report, which will be implemented by the National Park Service, is to rehabilitate Peirce Mill to provide a historically accurate representation of a typical mill complex in the region. This will include restoring the milling machinery to a fully operable condition. However, because the mill race was relocated away from the site many years ago, it will not be possible to restore operation of the mill using water power. The landscape of the complex will be rehabilitated to retain the historic character while allowing continued use. The final general management plan was revised to better clarify the upcoming action for Peirce Mill.

### Issue 2: Was Money Expended Recently on the Peirce-Klingle Mansion Misspent?

**Representative Comment 1:** I believe the Park Service has spent several tens if not hundreds of thousands of dollars redoing Klingle Mansion and now they seem to be wanting to talk about moving the administrative facilities up in either the nature center of the maintenance yard. (rocr3121.001)

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**Response:** The Peirce-Klinge Mansion is listed in the National Register of Historic Places and, under NPS policy, must be preserved. Virtually all of the funds spent on this building would have been spent for its protection and rehabilitation regardless of the use occurring within. The new use for the Peirce-Klinge Mansion must be compatible for the preservation of the building and will incorporate the preservation upgrades made to date.

## TRADITIONAL PARK CHARACTER AND VISITOR EXPERIENCE

### Issue 1: Visitors Currently Avoid Weekday Park Use Because of Traffic

**Representative Comment 1:** In recent years as we know, Beach Drive has become little more than a commuter highway with car after car speeding through the park. Five days each week the park is inundated with cars and clogged with traffic, particularly during rush hour. Only once have I ridden a bicycle on Beach Drive during rush hour, and I'm not sure whether it was out of curiosity, bravery or stupidity, but I haven't ventured back there since during rush hour. It's a hostile environment. It's an unsafe environment. You have a narrow road with a steady stream of cars speeding through—actually intermediately speeding and stopped and backed up for a considerable distance at the many stop signs along the way. (rocr3113.002)

**Representative Comment 2:** Despite all of the park visitors and people who love the park, I've learned over the years that lots of folks barely know its exists. And it's clear to me that the main reason for this is the incessant weekday car traffic. It's this traffic that leads so many people to think of the park and refer to it as simply the parkway. I think that's why it's practically deserted on weekdays. You just don't think about taking a walk or a bike ride along a parkway which by definition is meant only for cars. And you certainly don't want to take your kids there. (rocr3132.006)

**Representative Comment 3:** During weekdays, the high speed of traffic on Beach Drive, the many sharp turns in the road, and the resulting noise and pollution render that portion of Beach Drive far too hazardous for bicycling and unpleasant for walking or hiking. As a result, when we go out during the week, we have been forced by the traffic to avoid the Park entirely and to use only neighborhood streets. (rocr2894.002)

**Representative Comment 4:** The presence of cars on the upper portions of Beach Drive make any other use of that roadway impossible. The road is designed as a scenic drive. There are nine blind curves simply between Broad Branch and Military Road. If you are a cyclist, a rollerblader, a runner, you never know what's coming around one of those blind curves. It means that there are very few people who use that part of the park for recreation during the week. I hear people commenting who would use it. I've been down there. I've seen it. No one is running on that road. No one is using it for bicycling. Well, there's a reason. It's too hazardous. (rocr3066.003)

**Response:** The "Traditional Park Character and Visitor Experience" impact topic in the "Affected Environment" section of the final environmental impact statement was modified to include these types of perceptions among visitors.

**Issue 2: Many People Would Use Park on Weekdays**

**Representative Comment 1:** Now I know that some would say that no one would use the park on weekdays and that just having a weekend park is fine. Well, I think that's ridiculous. There are hundreds of thousands of area residents who could and would be using it during the week if it were made accessible and attractive. I'm thinking self-employed people who make their own schedules, parents who stay at home with their young children, students, retired people, folks in the tourist and restaurant trades who work weekends and get weekdays off. So there's no shortage of people who would use the park if it were made available to them. The incessant car traffic excludes people from the park. (rocr3132.006)

**Response:** Comment noted.

**Issue 3: What Is the Demand for Weekday Use?**

**Representative Comment 1:** In reading the Draft Plan, however, I found no clear evidence of the need for closing Beach Drive during the week. Indeed, there is no empirical data set out indicating, importantly, how many non-motorists would actually use the facilities during the week. (rocr0571.001)

**Representative Comment 2:** Most people work during the day. Was a survey conducted as to how many persons (automobilists, bicyclists, hikers~ joggers) would use this road during the day for recreational purposes only? How many NOW use this area during the day for recreational purposes? (rocr2822.002)

**Response:** The National Park Service has not performed counts of current weekday nonmotorized recreation use on Beach Drive. However, current weekday counts of participants in these activities would not be a good indication of park use if Beach Drive closures were implemented, just as the current heavy weekend use of Beach Drive for nonmotorized recreation would not continue if weekend management of Beach Drive was changed to allow traffic.

The National Park Service also has not conducted studies to estimate nonmotorized recreation use that would result from closures of Beach Drive to motorized vehicles. However, it is expected to be substantial, based on the more than 2,000 comments of support that the National Park Service received for Alternative D and the types of information that are included in comments for Issues 1 and 2.

**Issue 4: How Much Traffic Would Be Diverted by Beach Drive Closure?**

**Representative Comment 1:** There is no indication of how many motorists would be precluded from using Beach Drive during the periods of weekday closures. (rocr0571.001)

**Representative Comment 2:** It would seem mandatory that should ANY additional road closures take place that NPS measure the number of displaced vehicles and additional traffic congestion on near by streets. (rocr1523.002)

**Response:** Traffic counts conducted by the National Park Service in June 2004 determined that mid-day closures of Beach Drive between Joyce Road and Broad Branch Road would divert

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about 330 vehicle trips per hour from Beach Drive to other roads. This information was added to the final environmental impact statement.

### **Issue 5: Visitors Currently Avoid Weekday Park Use Because of Concerns about Personal Safety**

**Representative Comment 1:** In all the years I have lived in the city, I have never walked or cycled alone in the Park. I am afraid for my safety as a woman alone. As a woman, now in her senior years, I am even less likely to go walking in the Park. (rocr0798.002)

**Response:** The final environmental impact statement was modified to include a section on public health and safety, which includes an analysis of effects on personal safety. The “Affected Environment” section was revised to include data on crimes against persons (murders, rapes, and assaults) that occurred in the park over the 3-year period of 2001 through 2003.

### **Issue 6: Cyclists Use Park Roads Because the Paths Are in Poor Condition**

**Representative Comment 1:** I want you to not lose sight of a massive problem for cyclists and other recreational users in the park. Specifically the multi-use paths, particularly south of Peirce Mill have been deteriorating for decades. Many sections are now narrow, they’re potholed, broken by invading roots and covered with mud. These bike paths are not only a disgrace to the park and to the city, they’re positively dangerous. They are far below national standards.

If these deteriorating multiuse paths are not improved as part of this plan, or whatever plan emerges, there will be a growing movement among cyclists particularly to ride exclusively on the road. This can already been seen on the roads even where they’re running to parallel to trails. (rocr3118.002)

**Response:** Comment noted.

### **Issue 7: Describe Use of the Park for Birding**

**Representative Comment 1:** Birdwatching is the most rapidly growing outdoor activity in the USA (according to a Fish and Wildlife Service 2002 report), while activities such as biking are declining. Yet the plan speaks of improving facilities for bikers, while no mention is made of birders. (rocr0644.004)

**Representative Comment 2:** On any given day during the peak of migration, dozens of bird-watchers may be seen on the west ridge of the park, where observation is easiest due to access roads and open glades from which the trees can be more easily scanned. Many of these visitors go to picnic areas 17/18, others to the vicinity of the Nature Center, while others survey the Maintenance Yard. During migration season, birders represent one of the major user groups for the park and yet they are barely mentioned in the draft management plan. (rocr3025.003)

**Representative Comment 3:** Unlimited automobile traffic adversely affects other traditional uses of the Park also. Over the past couple of months, I’ve asked the birdwatchers who congregate along Glover Road in the spring and fall whether automobile traffic in the Park interferes

with their activities. They emphatically answer “yes,” saying it makes certain key bird watching areas completely unusable during the week. (rocr2923.003)

**Response:** Information on birding in Rock Creek Park was added to the “Affected Environment” section of the final environmental impact statement.

### **Issue 8: Describe Use of the Park for Canoeing and Kayaking**

**Representative Comment 1:** There is a long tradition of boating on Rock Creek. While float permits were required for several years, the permit restriction was lifted in 1986. Since then American Whitewater estimates that a few thousand boaters have floated through Rock Creek without incident. (rocr3022.005)

**Response:** Information on canoeing and kayaking in Rock Creek Park was added to the “Affected Environment” section of the final environmental impact statement.

### **Issue 9: There Are Many Components to Park Character and Visitor Experience**

In addition to the items described previously for this impact topic, commenters described elements of the traditional park character and visitor experience at Rock Creek Park.

**Representative Comment 1:** We use Rock Creek Park as our outdoor classroom. Almost every month of the year we lead environmental education programs in Rock Creek Park. (rocr3107.002)

**Representative Comment 2:** The people I see using the park during the day are eating their lunch in their car or standing outside their cars on the edge of the pull off or walking nearby enjoying the outdoors. Most bicyclists on the other hand seem to be young men in racing gear going as fast as possible, not looking at the scenery, indeed appearing as if they are using Beech Drive as a speed way. (rocr2870.003)

**Representative Comment 3:** Getting to and from the picnic areas also requires a car if you are going to have small children, elderly, or infirm people attending your function. Not to mention getting coolers, food, athletic equipment, etc. to those areas. (rocr1096.0020)

**Representative Comment 4:** You would think from these comments that roads are a very scarce commodity, that we don’t have any roads, and that wherever you go we can’t find any roads. As it is, there’s hundreds of roads. What is very rare and very precious is a place where people can bike, walk, or sit without having lots of traffic. (rocr3061.002)

**Response:** Under any of the alternatives, picnickers would continue to have access to the picnic groves by automobile, just as they currently do on weekends.

## REGIONAL AND LOCAL TRANSPORTATION

### Issue 1: Other Data Are Available that Should Be Used

**Representative Comment 1:** Instead of “updating” or revising its website, the National Park Service should be updating the traffic studies that it used to consider the impact of its road closure proposals on the adjacent neighborhoods and the National Park Service should be analyzing how its proposed road closures will be endangering the residents in these neighborhoods. It is unreasonable for the National Park Service to assume that the traffic diverted from Beach Drive would somehow magically all end up on 14th or 16th Street, Connecticut, Wisconsin or Massachusetts Avenues. At the end of May and beginning of June 2003 the MNCPPC performed a traffic study in our neighborhood. This study shows that between 9 a.m. and 3 p.m. during the weekdays, 670 cars travel on Daniel Road; however, during those same hours on Saturday the number of cars jumps to 970. The closure of Beach Drive on Saturday accounts for all of this increase. The MNCPPC study also finds that at least 1500 cars use Beach Drive at the Maryland line between 9 a.m. and 3 p.m. during the weekday. (rocr0764.003)

**Response:** A supplemental traffic study was conducted by the National Park Service in June 2004. The results were included in the final environmental impact statement.

The traffic counts referenced in this comment were obtained from the Maryland-National Capital Park and Planning Commission and were included as Table 17 in the final environmental impact statement. The data do not indicate how much of the increase can be attributed to the weekend closure of Beach Drive in Rock Creek Park and how much is related to neighborhood residents running errands or conducting activities on weekends.

**Representative Comment 2 from Maryland Department of Transportation:** MD 410 (East-West Highway) intersects Beach Drive and is the closest State road to the affected area. The average daily traffic (ADT) for MD 410 near Beach Drive is 31,600 vehicles per day (VPD). The ADT on Beach Drive is approximately 5400 VPD at the State line which is one mile south of MD 410.

Although some the National Park Service’s proposals may significantly impact commuters and Washington, DC streets, we do not anticipate any impacts to State roads. (rocr2983.002 and .003)

**Response:** This information was added to the final environmental impact statement.

### Issue 2: Traffic Statistics Are Questionable

**Representative Comment 1:** And then there is a question about your traffic statistics which you have to deal with somehow. You always say that there are 9,000 cars using Beach Drive on weekdays. However, in the traffic study from 1990 they say then there are 9,000 cars using Beach Drive. So either there is no increase in traffic on Beach Drive in 14 years or there’s something wrong with the statistics. (rocr3108.006)

**Response:** Traffic counts were updated in the final environmental impact statement using the most current data available. Within the park, these included traffic counts from a June 2004 study

conducted by the National Park Service. The most recent data for roads outside the park consisted of 2001 traffic counts from the District of Columbia, Department of Transportation.

A comparison of the versions of the Average Weekday Traffic Volumes map in the draft and final environmental impact statements indicates that changes in traffic in the study area have not been uniform or predictable. While traffic increased on some road segments, it remained constant or decreased on other road segments. This was observed in the count data both from the National Park Service and the District of Columbia, Department of Transportation. It is beyond the scope of the environmental impact statement to determine why decreases in automobile traffic counts occurred on some road segments in the park and surrounding area.

### **Issue 3: Augment Descriptions of Traffic in the Park**

**Representative Comment 1:** Another concern is that the GMP does not appear to address the existing traffic hazard for weekend recreational users in between the two northernmost Beach Drive recreation zones. For a few hundred yards, recreational users must share the roadway with motor vehicle traffic crossing the Park on Wise Road. (rocr3121.006)

**Representative Comment 2:** Commercial traffic is not allowed but travels there with regularity, trucks are not allowed but travel with regularity, school buses, county vehicles, taxicabs, etc. (rocr1206.002)

**Representative Comment 3:** On an almost daily basis I commute on Beach Drive north of Military Road on a bicycle between my home on Kanawha Street and office in Bethesda. Even though I am going against the majority of rush hour traffic in the morning and afternoon/evening, I find the ride becoming increasingly dangerous. Friends who also commute on bicycles on this section with rush hour traffic find it even more dangerous.

Beach Drive is extremely narrow and curvy here. With the potholes and poor pavement conditions, cyclists cannot safely stay very close to the edge of the roadway, making it even more difficult for cars to pass. Cars cannot pass cyclists without crossing the center line. In the rush to pass cyclists, most drivers inevitably become agitated and try to swerve around cyclists before crashing with oncoming traffic. Motorists behind the first car behind a cyclist may not see what is causing the slowdown and begin honking their horns and yelling. The “bicycles in roadway” signs provide little security for cyclists or explanations to motorists. (rocr2901.006)

**Response:** The final environmental impact statement was modified to include additional information on traffic in the park and the perceptions of park users concerning traffic.

### **Issue 4: Augment Descriptions of Traffic On Surrounding Thoroughfares**

**Representative Comment 1:** Report seems flawed. References Beach Drive at Upshur. Level of Service. According to the report, Blagden was under capacity in 1990. We may take issue with that. When you study the traffic validation study at page 347, it appears that traffic is being diverted from Joyce Road and roads like 16th are picking up volume. (rocr2769.013)

**Representative Comment 2:** 16th Street and Connecticut Avenue. Both are already experiencing severe congestion in both rush hours and unacceptably poor levels of service at several key inter-

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sections that are already major bottlenecks, and that is under current conditions. Imagine the travel conditions that are projected on these major arterials between now and 2020. (rocr0584.002)

**Response:** Comments were noted.

### **Issue 5: Augment Descriptions of Traffic in Surrounding Neighborhoods**

**Representative Comment 1:** On Saturdays and Sundays, Daniel Road becomes the thoroughfare for people who would otherwise be going through Beach Drive. The amount of traffic that is presently diverted onto Daniel Road because Beach Drive is closed is very substantial. (rocr3058.001)

**Representative Comment 2:** These residents already contend with cut-through traffic on the weekends, due to the closure of Beach Drive. (Senator Barbara A. Mikulski, rocr2974.001)

**Representative Comment 3:** Weekend closure combined with annual increases in DC traffic already impact Rollingwood. Our neighborhood streets, particularly Daniel, Wyndale, Greenvale, Pinehurst Parkway, Woodbine, Leland and Brookville Road already experience "cut through" vehicles searching for alternate routes from Beach Drive when it is closed or crowded. (rocr2856.002)

**Representative Comment 4:** As a child, I could walk safely to commercial areas in Takoma Park and Rockville. By the last couple of decades, that's become a risky undertaking, even for a cautious adult. But worse yet, even many of our neighborhoods are risky for pedestrians. My own neighborhood (in the North Four Corners area of Silver Spring) was so heavily used by impatient cut-through drivers that I felt I needed a reflective vest on morning or evening jogs. Happily, the county council has recognized this problem and made some significant improvements with various "traffic calming" measures.

One of the most hazardous strips of road in the county is the Beach Drive/Jones Mill Road strip from the D.C. line out to the Beltway: narrow, curvy, poor visibility, and fast moving traffic. The traffic volume is still relatively light in midday, although the speed is relentless. I usually drive along Beach Drive at 35 to 40 mph -- that's slower than most of the traffic, and if I try driving more slowly I risk creating exceptionally dangerous enraged drivers. (rocr0550.002)

**Response:** The final environmental impact statement was modified to include additional information on traffic in neighborhoods around the park and the perceptions of area residents concerning traffic.

### **Issue 6: There Is Little Need for Diverted Park Traffic to Enter Neighborhoods**

**Representative Comment 5:** Four major parallel (to Beach Drive) routes for autos (16th Street, Georgia Avenue, Connecticut Avenue, and Wisconsin Avenue) as well as several minor routes (Oregon Avenue, Ross Drive, Glover Road, and Broad Branch to name a few) also serve as alternatives, and Metro's red line parallels the Park on both the east and west. It is hard to imagine a situation in which more alternatives to driving on a given road exist. The few people traveling on

Beach Drive during the mid-day period can be diverted to these alternatives, avoiding local neighborhood streets entirely. (rocr2925.018)

**Response:** Comment noted.

## COMMUNITY CHARACTER

### Issue 1: Update Population Characteristics for Surrounding Areas

**Representative Comment 1:** Page 155 and Table 16 on Page 156. Please update in two ways: (a) using the now-available Census 2000 data instead of Census 1990 data used in the draft; and (b) recognizing the change in Ward boundaries (effective 2002, because of redistricting). [The DC Office of Planning can help you re-organize the data by the current Wards.] Without these two changes, the data would confuse and mislead (instead of guiding and clarifying) during the years when the GMP will actually be used. (rocr3029.003)

**Response:** The final environmental impact statement was updated to include data from the year 2000 census. The data are now presented by zip code tabulation area rather than political ward boundaries.

## PUBLIC HEALTH AND SAFETY

### Issue 1: Address Safety for Cyclists

**Representative Comment 1:** I'm a pretty active cyclist and I'm one of those people who is actually crazy enough to ride a bicycle north from my house on Beach Drive up to the Capital Crescent trail at East West Highway during rush hour because I now work in Bethesda. It's really quite dangerous. For a car to pass me going north on Beach Drive or a car to pass a commuter—a cycling commuter coming south on Beach Drive, they really have to go across the yellow line. (rocr3121.004)

**Representative Comment 2:** I routinely observe behavior by automobile drivers in the Park that puts traditional/recreational Park visitors at risk. These behaviors include unchecked speeding, failures to yield right-of-way to pedestrians and bicyclists walking across crosswalks and intersections, failures to stop at stop signs and passing at excessive speeds and in dangerous locations. In addition, as a runner and bicyclist I've had bottles and other objects thrown at me, I've been screamed at many times to "get off the road," I've had cars swerve at me and stop suddenly to block my path. (rocr2923.002)

**Response:** "Public Health and Safety" sections were added to the final environmental impact statement under "Affected Environment" and "Environmental Consequences." They include current statistics on traffic safety, including accidents involving cyclists and pedestrians, and analyze impacts of the alternatives on the safety of visitors, including those participating in nonmotorized recreation on park roads.

## AFFECTED ENVIRONMENT

### **Issue 2: Address Safety of Visitors Using the Park**

**Representative Comment 1:** There were 14 women attacked in Washington, D.C. while blading, walking, jogging in a year starting in September 2000 on our trails and roads and paths. Upper Beach Drive during the mid-day, mid-week closures would give me a big, wide open, safe place to run and walk with my fellow cyclists, baby joggers and others. On the weekends, it's a really comfortable place to run. (rocr3047.003)

**Response:** The "Public Health and Safety" section that was added to the final environmental impact statement include current statistics on crimes against persons (murder, rape, and assault) in Rock Creek Park and the Rock Creek and Potomac Parkway and analyze impacts of the alternatives on the personal safety of visitors.

## ENVIRONMENTAL CONSEQUENCES

### **Issue 1: Many Data That Supported Impact Analyses Are Out of Date**

**Representative Comment 1:** I do not intend to address with specificity the obvious problems in the draft plan with regard to the age of the National Park Service's studies. (rocr0764.010)

**Response:** As described in the Consultation and Coordination section, the general management planning process started in 1996. Several studies were conducted at that time to support a planning effort that was expected to be completed within about 3 years. However, the controversial nature of planning for Rock Creek Park resulted in numerous delays and some of the data became outdated.

All data were reviewed in the process of preparing the final general management plan. It was determined that updated traffic information was needed, and a new traffic study was conducted in June 2004. Government agencies and others were contacted for updated information in other areas. All of the data in the final environmental impact statement are sufficiently current to support the evaluation of impacts of the alternatives.

## AIR QUALITY

### **Issue 1: General Comments on Air Quality Effects**

**Representative Comment 1:** Diverted stop and go traffic will release increased emissions in neighborhoods. (rocr3037.000).

**Representative Comment 2:** Given the increasing congestion on our roads, closing a major through-way would be detrimental to us all. It would increase the emissions levels that sitting in traffic would cause. (rocr0651.002).

**Response:** Comments were noted.

### **Issue 2: The BEQ Had Concerns about the Analysis**

All of the comments under this issue are from the District of Columbia, Department of Health Environmental Health Administration, Bureau of Environmental Quality (BEQ) (rocr1736.002)

**Comment 1:** The draft document contends that measured carbon monoxide (CO) concentrations in the park areas drift from Washington, DC proper, consequently CO emissions is an area-wide problem that could not be worsened by Rock Creek-related projects.

## ENVIRONMENTAL CONSEQUENCES

The BEQ disagrees because the incremental contribution of localized projects to CO hotspots is a local concern. Consequently, the BEQ takes the position that proper air resource management will improve the local air quality, and by extension the overall regional situation. Thus, the incremental levels of CO pollution should not and must not be ignored.

**Response:** The discussion of air quality was clarified in the final environmental impact statement. The draft acknowledged that “Carbon monoxide is a tailpipe emission, and local monitoring can indicate problem areas.” Indeed, the air sampling program commissioned by the National Park Service in and around Rock Creek Park (Robert Peccia and Associates *et al.* 1997) was intended to identify possible hot spots of local concern.

The draft environmental impact statement that “some of the carbon monoxide detected in the park drifts in from the city” was based on the detection, on three sampling occasions, of carbon monoxide concentrations at the golf course monitoring location that were higher than carbon monoxide concentrations at monitoring sites at major intersections near the park. The golf course sampling location had been chosen in an effort to establish background (unaffected by local traffic) levels of carbon monoxide within Rock Creek Park. The golf course could have high readings only if carbon monoxide had been transported (drifted) to the golf course from the location where it was generated.

The statement “carbon monoxide is an area-wide air pollutant” was changed in the final environmental impact statement to indicate that “elevated concentrations of carbon monoxide were detected at all of the sampling locations.”

The National Park Service concurs that incremental reductions in carbon monoxide emissions will help improve air quality both locally and regionally. A statement regarding the NPS’ intent to work with others at the federal, state, and local levels in the development and implementation of air pollution control approaches that will remedy existing, and prevent future, impacts on resources and values from human caused air pollution was added to the section entitled “Service-wide Mandates and Policies.”

**Comment 2:** In analyzing the impacts on air quality of the park management plan, the draft document did not analyze dust and smoke emissions because the occurrences were believed to be both infrequent and of small magnitudes that overall contributions to the park air quality is negligible.

While BEQ recognizes variability in levels of source emissions, this agency advises that proponents of projects thoroughly evaluate contemplated activities for air quality impacts. This of course is best done during the planning phase of a development, as is currently the case. Consequently, project components such as Administration and Operations which might involve: (1) New Construction, (2) Alteration of traffic pattern, (3) Rehabilitation / Modification, (4) Installation of a HVAC system, etc, will require BEQ approval.

**Response:** An environmental assessment for compliance with the National Environmental Policy Act would be prepared prior to implementing any of the components in the general management plan that would involve construction. Each environmental assessment, which would be prepared during the specific project’s planning phase, would evaluate the air quality impacts of that contemplated activity and its alternatives, plus the cumulative impacts Approval from the District of

Columbia, Department of Health, Air Quality Division would be obtained for the activities, such as those listed above, over which it has jurisdiction.

**Comment 3:** The air quality analysis was based on 1996 air quality monitoring. The CO concentration determined in 1996 was based on a 1990 Average Weekday Traffic Volume. The consultant, Robert Peccia & Associates et al., projected this 1996 data to the year 2020 to arrive at a number that formed the basis for the air quality impact analysis associated with the Rock Creek Park and Rock Creek Potomac Parkway project.

*It is the opinion of the BEQ that data validity is a concern and requires justification.*

The BEQ has two concerns with this methodology [which used 1996 monitoring data and 1990 traffic data]:

- The use of a seven (7) year old air quality monitoring data casts doubt whether the modeling prediction would actually capture current air quality conditions in the Rock Creek Park environs.
- A similar argument can be made in the adoption of a 1990 Average Daily Traffic Volume in the projection of CO vehicular loadings for the year 2020.

Project components such as Administration and Operations which might involve: (1) New Construction, (2) Alteration of traffic pattern, (3) Rehabilitation / Modification, (4) Installation of a HVAC system etc, may be subject to the Environmental Impact Screening Form process, using the latest available data.

**Response:** The data used to calculate impacts in the final environmental impact statement were updated.

- The most recent average traffic counts available for city streets were obtained from the District of Columbia, Department of Transportation map entitled 2001 Traffic Volumes. For locations inside Rock Creek Park, average daily traffic counts were measured in June 2004.
- Carbon monoxide monitoring data were obtained from the District of Columbia, Department of Health, Air Quality Division for their monitoring site at the Verizon Telephone building at 21st and K Street, N.W., which is 3.2 miles from the headquarters of Rock Creek Park. Data for 2001 and 2002, which best correspond with the dates for most of the traffic data (2001) were used.

When project components that include the activities listed in the comment are in the detailed planning stage, the National Park Service will coordinate with the Air Quality Division regarding the need to implement the Environmental Impact Screening Form process. The most current data available at that time will be used in that analysis.

**Comment 4:** The document under review further suggested that the traffic modeling for the year 2020 did not identify any changes in regional traffic arising from management actions at Rock Creek Park, therefore the air quality analysis focused on incremental changes at each roadway intersections.

## ENVIRONMENTAL CONSEQUENCES

*The BEQ believes that this approach is acceptable provided that the indicated traffic model has merits.*

**Response:** The traffic analysis was performed using the transportation model of the Metropolitan Washington Council of Governments, which is the agency in the Washington, D.C. area that is responsible for regional planning and traffic modeling. This model is well suited for assessing traffic impacts in and around Rock Creek Park.

**Comment 5:** Why were HOV-2 restrictions not considered with Alternative D? Page 62 states: “By the year 2020, with Alternative B commuter traffic along some portions of Beach Drive would routinely near gridlock conditions.” This would be the same level of commuter traffic as under Alt. D. While modeling may not reveal a significant difference in traffic within Rock Creek under HOV-2 restrictions, it seems that it is a necessary first step in encouraging individuals to carpool and for creating an impetus for other roadways to be classified as HOV-2 during commuting hours. Maintaining status quo would not, in the long-term, improve either air or water quality.

**Response:** Consistent with the letter from Washington, D.C. Mayor Anthony Williams that led to its development (the letter was included in Appendix D of the draft document), Alternative D was designed to implement weekday vehicular traffic restrictions only during non-rush-hour periods. In accordance with the intent of the mayor’s letter, Alternative D did not include high-occupancy vehicle restrictions. In the draft environmental impact statement, the effects of high-occupancy vehicle restrictions were considered in the analysis of Alternative A and Alternative C.

**Comment 6:** Also, the text on pg. 344 is confusing as to how estimates of HOV-2 usage were obtained. It states “consultant estimates of average auto occupancy for each trip purpose were utilized based on data collected within project study area during this study as well as from other similar urban areas.” Does this mean that the number of vehicles with greater than 2 individuals were counted as those that would use HOV-2 lanes? It does not seem reasonable to use figures obtained from Rock Creek when HOV-2 restrictions do not currently exist. Additionally, what are some of the modeling assumptions in regards to HOV-2--does the modeling assume that people would take other routes, rather than carpool, and this is why a reduction in volume would not be observed?

**Response:** Yes, the analysis assumed that all single-occupancy vehicles currently using the portions of Beach Drive that would be designated for high-occupancy vehicle use would have to use alternate routes during high-occupancy vehicle restrictions. It also considered that some drivers of commuter vehicles carrying two or more people and currently using the city street grid may relocate their trip to Beach Drive during the high-occupancy vehicle periods.

Based on the experience of other areas with high-occupancy vehicle restrictions, it was assumed that most people who currently are the sole occupant of a vehicle would take other routes rather than carpool. While some carpooling might be promoted by high-occupancy vehicle restrictions among the 700 drivers who currently use Beach Drive during the peak hour, reductions in area traffic volumes and air emissions would not be detectable compared to peak-hour traffic volumes on nearby arterials (for example, 2,800 vehicles on 16th Street, 3,400 vehicles on Connecticut Avenue, and 2,900 vehicles on Military Road) during the same peak hour.

**Comment 7:** Text: pg. 19 “The analysis showed that Alternative D is environmentally preferred by a close margin.”

*This is different than the text on pgs. 64-65, where it is stated that the environmentally preferred alternative is Alternative C. Need to clarify why D was selected.*

**Response:** The Bureau of Environmental Quality inadvertently received an intermediate document that erroneously identified the wrong alternative as environmentally preferred on pages 64 and 65. In the draft general management plan that went to the public, Alternative D was identified as the environmentally preferred on those pages. In the final general management plan, Alternative D is correctly identified as the environmentally preferred alternative.

**Issue 3: Consider Air Quality Impacts in Surrounding Neighborhoods**

**Representative Comment 1:** NPS failed to perform environmental impact studies on neighborhoods surrounding the park. Surrounding neighborhoods will have increased emissions due to greater volumes of stop and go traffic. (rocr2999.010)

**Representative Comment 2:** The National Park Service fails to consider the environmental impact of the diversion of traffic onto neighborhood roads, which will increase the level of stop and go traffic. Residents adjoining the Park also will be forced to drive to the Park instead of walking through the neighborhood streets that would be made unsafe by any road closure. Therefore, the National Park Service ignores the strong likelihood that its road closure proposal will have a negative impact on the air quality of not only those adjacent neighborhoods, but also the Park itself. (rocr0764.009)

**Response:** The District of Columbia, Department of Health, Air Quality Division operates an ambient air monitoring network consisting of just six permanent air monitoring stations. Because concentrations of air pollutants disperse rapidly, air quality experts from the District of Columbia, Department of Health and U.S. Environmental Protection Agency have agreed that for protection of health and compliance with regulations, the data from the six sites provide an adequate representation of air quality for the entire district.

Traffic counts were obtained from the Maryland-National Capital Park and Planning Commission and added to the final environmental impact statement as Table 17. These data show that the average daily traffic count on Beach Drive north of the park is 5,700 vehicles. Traffic counts made by the National Park Service in June 2004 showed that 6,600 vehicles use Beach Drive north of Broad Branch Road on a normal weekday. These values represent the worst-case total pool of vehicles that would be available for diversion if segments of Beach Drive were permanently closed (Alternative C).

At the same time, the neighborhoods around the park are being affected by the rapidly dispersing pollutants from other roads in the area. Values from the updated Average Weekday Traffic Volumes map in the final environmental impact statement for the major highways closest to the north part of the park include:

East-West Highway	33,500 vehicles per day
Connecticut Avenue	35,000 vehicles per day

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16th Street	36,000 vehicles per day
Military Road	20,000 vehicles per day

Similar traffic levels on Wisconsin Avenue, Nebraska Avenue, and Georgia Avenue also produce pollutants that disperse into the neighborhoods around the park.

From these counts, was calculated that air pollution from all divertible traffic on Beach Drive represents only about 5 percent of the air pollution that currently is affecting neighborhoods from the closest arterials. Changes in air pollutant levels in the neighborhoods that would result from management changes of Beach Drive would not be measurable compared to air pollutant levels in the area from other traffic in the area (negligible impact). Therefore, there was no need for a more detailed analysis on effects of the alternatives on air quality in the nearby neighborhoods.

Traffic data from the Maryland-National Capital Park and Planning Commission show that during mid-day period on Saturdays, traffic on Daniel Road increases by 300 vehicles over 6 hours compared to the same period on weekdays. This is less than 1 vehicle per minute. It is unlikely that this level of increase would influence neighborhood residents to use automobiles rather than walking if they wanted to access the park.

### **Issue 4: Beach Drive Closures Would Change Automobile Emissions Locally**

**Representative Comment 1:** Additionally, more cars traveling, stopping and starting throughout our neighborhood will add exhaust emissions, adversely impacting our environment. (rocr2856.004)

**Representative Comment 2:** I favor the "Alternative C" plan of action to help eliminate the car exhaust fumes and traffic through the park at all times of day and night, even if it means I must change some of my driving habits. (rocr2753.002)

**Response:** As described in the response to Issue 3, air pollutants disperse rapidly, so that just six monitoring sites provide an adequate representation of air quality for the entire district for the purposes of protection of health and compliance with regulations. As a result, the traffic management components of the alternatives would not have a measurable effect (negligible impact) on the air quality of the park or surrounding neighborhoods.

### **Issue 5: Air Quality Impacts Should Have Been Evaluated for Plants**

**Representative Comment 1:** Measuring carbon monoxide levels for impact on people and wild animals is good. But animals can move and are harder to find. Plants do not move as animals do and they are the better indicators of this type of environmental damage. Plants are the homes and food of animals. Components of smog such as ozone, aldehydes, gaseous fluorides, and sulfur dioxide are better indicators. Horace Wester (plant pathologist) and Maurice Sullivan (research biologist) of the National Capital Region reported on damage to plants in the parks from ozone and sulfur dioxide in 1970. Part of the Rock Creek and Potomac Parkway is included in their observation area. An investigation of the effect of automobile exhaust on the "timber" should have been done before considering different traffic patterns. (rocr3018.003)

**Response:** National Ambient Air Quality Standards were established to protect environmental components, including plants, as well as human health. None of the alternatives would result in changes the ability of the area to meet any of the National Ambient Air Quality Standards. Therefore, the analyses that were performed were adequate to support the impact evaluation at the broad planning level represented by a general management plan.

#### **Issue 6: Beach Drive Closures Would Increase Air Emissions**

**Representative Comment 1:** We would now have to take longer trips in addition to all the other cars that will have prolonged commutes due to restrictive use of Beach Drive. Has an environmental impact study been done to determine the pollution due to additional time on the roads? (rocr2853.004)

**Representative Comment 2:** Cars will be forced onto the major north south arteries where they will emit far more pollution as they idle at stop lights and add to the congestion. (rocr2787.002)

**Representative Comment 3:** Won't speed bumps slow traffic to the point of creating more congestion and pollution? (start/stop over & over) (rocr0484.005)

**Representative Comment 4:** Apart from the crawling traffic that the closure of Beach Drive will create in our community, our neighborhood will suffer a resulting environmental pollution problem. On 16th Street, for example, rush hour traffic is a major source of pollution. Closing Beach Drive will add to that pollution overall in our neighborhood and throughout the city. (rocr3085.003)

**Response:** A traffic study was conducted in June 2004 to determine the effects of closing Beach Drive between Broad Branch Road and Joyce Road. The study found that some of the travel routes that involve Beach Drive are more time-consuming (and, therefore, more air emissions producing), even during the rush hours, than travel routes between the same points that avoid Beach Drive. Therefore, management actions that diverted automobile traffic from these Beach Drive routes could slightly reduce air emissions. However, this could be offset by the slight increase in congestion during rush hours on other roads that would result from the diverted traffic.

None of these changes would be measurable compared to air emissions occurring throughout the area. Based on the threshold criteria on page 165 of the draft environmental impact statement, changes in air emissions because of changes in the management of Beach Drive would be negligible.

#### **Issue 7: Need to Better Consider Decisions in a Regional Context**

**Representative Comment 1:** The Washington, D.C. metropolitan region is already an air quality non-attainment area. Additional curtailment of vehicle traffic on these public park land roads will exacerbate air pollution throughout all the areas surrounding the park. The US Park Service and the Department of the Interior must consider regional impacts when making park usage decisions. Traffic diverted off the park roads will be forced onto already overcrowded streets in the region. The consequences of more traffic on already overcrowded streets can only worsen congestion, further lower air quality. (rocr0711.003)

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**Response:** Air quality would not be affected by the selection of park management alternatives, because the alternatives would relocate traffic but would not substantially change traffic volumes or extend the duration of trips. As described in the response to Issue 6, the June 2004 traffic study conducted by the National Park Service demonstrated that some trips through the park, even during rush hours, could be made more time-efficiently by not using the park. As a result, closing parts of Beach Drive would result in little change in air emissions.

### **Issue 8: Park Can Be an Important Contributor in a Regional Context**

**Representative Comment 1:** The analysis fails to look at the possibility that as a regional air quality improvement, the regional governments here might get together and say we actually want to encourage people to start commuting more by bicycle, get off of the road, and use more mass transit. We're going to create a better set of bike trails for which Rock Creek Park certainly would be a central space for that.

If they did that and if that was part of an overall plan to improve air quality in the region, which we all know needs to be done - we have code orange and code red days where it's unsafe to go outside. The Park Service should factor that in their environmental analysis. If it turns out that Rock Creek Park is a significant component of an overall air quality improvement plan, that needs to be taken into account. (rocr3068.003)

**Representative Comment 2:** In analyzing Alternatives C and D, the draft GMP finds that the effect on air quality would be negligible, and that encouraging some commuters to use bicycles "would result in a beneficial but negligible effect on the regional air quality." (p. 229. 256). This analysis is flawed, because it fails to take into account the potential role of the Park as part of an overall regional plan to improve air quality in the region.

Because the Park constitutes an important element of a regional network of bikeways (including both bike-friendly streets and paths such as the Capital Crescent Trail and Metropolitan Branch trail, which are under development), it would be wrong to assume that encouraging bicycling has a negligible impact on air quality.

The metropolitan D.C. area is suffering from an air pollution crisis. The city is becoming unlivable during much of the summer months, with frequent code red and code orange air quality alerts. It is quite possible that regional authorities will take action to deal with this problem by getting a substantial number of cars off the roads. Increased bicycling would be an integral part of the solution. It will not be enough by itself, but together with increased Metro use, carpooling, and other factors, it can make the difference to reach a solution to our crisis.

The draft GMP/EIS should therefore at a minimum include flexibility for adoption of Alternative C if regional governments develop a transportation plan which calls for substantially increased bicycling and relies on Rock Creek Park for a significant element of that increase. (rocr1726.003)

**Response:** The National Park Service understands that incremental steps in reducing air emissions are important and that providing a north-to-south linkage is an important component in the regional network of bikeways. However, it is unlikely that the implementation of Alternative C or Alternative D would cause large numbers of residents to change from automobiles to bicycles as a primary form of transportation such that a measurable decrease in the concentrations of air pol-

lutants would be detected. Thus, based on the threshold criteria on page 165 of the draft environmental impact statement, the beneficial effect would be negligible.

In the final general management plan, the preferred alternative was modified to stress flexibility and adaptive management in its implementation. If regional governments were to develop a transportation plan that calls for substantially increased bicycling and relies on Rock Creek Park for a significant element of that increase, the National Park Service would be willing to engage in discussions to determine how that goal could be achieved.

### **Issue 9: Ozone Effects Should be Considered**

**Representative Comment 2:** We are concerned to be assured of the plan's assessment that ozone levels will not be effected. As we fear that ozone may settle in the lower levels of the Park. (rocr3139.006)

**Response:** Air quality studies conducted for the National Park Service by Robert Peccia & Associates, *et al.* demonstrated that air pollutants, including ozone, do not settle in the Rock Creek valley within the park. Conversations with experts from the District of Columbia, Department of Health, Air Quality Division reconfirmed that ozone is a regional problem that is requiring coordinated action throughout the eastern seaboard.

## **ROCK CREEK AND ITS TRIBUTARIES**

### **Issue 1: The BEQ Had Concerns about the Analysis**

All of the comments under this issue are from the District of Columbia, Department of Health Environmental Health Administration, Bureau of Environmental Quality (BEQ) (rocr1736.003)

**Comment 1:** We are particularly concerned with an issue that is not dealt with in the document - routine maintenance of the Park. There are several invasive species of plants and animals that are having a devastating effect upon many areas in and outside of the Park. Because the Park is surrounded by urban areas with impervious surfaces, storm flows have and are causing stream channel instability and a loss of habitat. Both of these issues are operation and maintenance issues. We believe that O&M budgets need to be increased in order to protect and improve the Park ecosystem.

**Response:** Comment noted.

**Comment 2:** *Regarding the Alternative A analysis, which stated that traffic reductions on Beach Drive would reduce the loadings of pollutions that were being washed off the road into the creek:*

The traffic studies did not find that within the Rock Creek watershed traffic would substantially decrease under any of the alternative—"The traffic modeling for the year 2020 did not identify any changes in regional traffic because of management actions at Rock Creek Park. Instead, the alternative would redistribute the same traffic volume through different roadways"(pg. 162). Automobiles within the watershed would still be releasing these pollutants, and while it is possi-

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ble that some would be intercepted/filtered by vegetation, most of these pollutants would eventually enter Rock Creek, and it is unlikely that pollutant levels would be noticeably lower.

**Response:** The thought was that Beach Drive, which runs parallel and is adjacent to Rock Creek, would particularly affect the water quality of the creek because there would be little opportunity for pollutants to settle out or be filtered out in transit. However, we concur with the comment. The level of impact was changed to negligible in the final environmental impact statement.

**Comment 3:** For the BMP practices, BEQ suggests that it be specified that native vegetation be used for ground cover and that the planting of riparian trees and no mow zone along portions of Rock Creek also be considered.

**Response:** Consistent with *Management Policies 2001*, the National Park Service uses native species in vegetation plantings. Exceptions occur only in localized, specific settings, such as cultural landscapes where plant communities reflect the character of the landscape that prevailed during the target historic period.

Some mowing is necessary to maintain historic vistas and visitor use areas along Rock Creek.

**Comment 4:** *Regarding the cumulative impact analysis:*

It is not clear how the alternative provides major and beneficial improvements to water quality, as the only primary change would be the use of BMPs at park facilities and during construction. As mentioned above, BEQ does not believe that reduction in traffic along the parkway would correlate to reduction in pollutants entering Rock Creek, as overall traffic numbers are anticipated to remain the same within the entire watershed. If the document is suggesting that Alternative A, in conjunction with other planned activities, would be beneficial the sentence should be reworded—“The incremental effects of the improvements, in conjunction with other planned WASA and Woodrow Wilson Bridge mitigation projects, would have a major and beneficial improvement to water quality”.

**Response:** The final environmental impact statement was changed to incorporate the suggested text and to clarify that these major, beneficial effects would result from many combined actions. In addition, the text on page 171 was changed to read “Compared to future conditions occurring under the alternative of no action (Alternative B), Alternative A would produce *negligible to measurable*, long-term improvements in the water quality and storm water hydrology.”

**Comment 5:** No mention is made in the Impacts on Rock Creek and tributaries or in the cumulative impact section on the impacts of tailpipe emissions on water quality via atmospheric deposition. Burning of fossil fuels has been known to increase nitrogen oxide (NOx) inputs to water. Reductions in tailpipe emissions would be beneficial to both air and water quality.

**Response:** As described in the BEQ’s comment 4 on air quality, the BEQ accepts the approach that there would not be any changes in regional traffic (and its associated tailpipe emissions) arising from management actions at Rock Creek Park, just incremental changes at individual roadway intersections as the traffic was redistributed. This same finding is the basis for BEQ’s Comment 2 on water quality, above. As a result, there would not be any changes in nitrogen oxide inputs to water between the action and no action alternatives.

**Issue 2: Analyses of Impacts from Construction Are Inadequate**

**Representative Comment 1:** Trail widening, trail construction and relocation, and construction of new facilities in the park will affect resources and cause some loss of resources. The GMP needs to say this and not brush off these impacts by saying that BMPs will protect the resources from loss. (rocr2981.013)

**Response:** The analysis of impacts was reviewed and the findings are still considered accurate. No changes were made in the final environmental impact statement.

An environmental assessment for compliance with the National Environmental Policy Act will be prepared prior to implementing any of the components in the general management plan that would involve construction. Each environmental assessment, which would be prepared during the specific project's planning phase, would evaluate the effects on water quality and other impact topics, based on planning-level descriptions of facility locations, sizes, and mitigating measures. As part of this process, the National Park Service will provide opportunities for agency and public review and comment.

**Issue 3: Need to Coordinate with Other Communities**

**Representative Comment 1:** On the question of excess water, it seems to me that as part of the management plan there has to be a direction to allow the staff to figure out and work out the problems and the solutions to ask the cooperation of the nearby communities both in D.C. and upstream, because if we don't ask we're not going to get. (rocr3135.001)

**Response:** The National Park Service's commitment to work with other agencies was included in the draft general management plan and environmental impact statement. In particular, see pages 16 through 19 and 169 through 171. Additional information on cooperative efforts to improve water quality through the NPS' participation in the Chesapeake Bay Program was added to the final general management plan and environmental impact statement.

**Issue 4: An Additional Potential Pollution Threat Should Be Considered**

**Representative Comment 1:** Further, the recent decision by the Maryland Department of the Environment to issue a permit for an expanded horse stable operation at the Meadowbrook facility in the Rock Creek flood plain poses an additional potential pollution threat. (rocr0829.007)

**Response:** The final environmental impact statement was changed to include information on this facility.

**Issue 5: Impact Analyses Are not Accurate**

**Representative Comment 1:** It is not correct to say that continuing current management practices will have no permanent and irreversible adverse effect on the natural environment. Not putting more effort into controlling storm water and other discharges into Rock Creek from outside the park will worsen the problems of accelerated erosion and changes in hydrology from excess loading during storms, as is stated in several places throughout this draft. This will impact vegeta-

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tion, wildlife, water quality, and many other natural resources. It cannot be assumed that there will be more cooperation among agencies than there has been in the past. There is no supporting evidence that BMPs will be implemented by other agencies (they haven't been in the past) or that the BMPs will have the desired effect. Conclusions should be that continuing current practices would have an adverse effect on all aspects of the environment. (rocr2980.005)

**Response:** The evaluation of effects on water quality (and all other impact topics) includes two components: a determination of the effects from this project (the general management plan) only, and an evaluation of the additive effects from this project with effects from other actions in the past, present, or reasonably foreseeable future. This latter category is included under the heading "Cumulative Impacts" in each impact topic.

The evaluations on irreversible and irretrievable commitments of resources at the end of the evaluation of each alternative apply to the impacts from the general management plan only. These evaluations do not apply to cumulative impacts, where conditions can deteriorate regionally even as efforts are made to improve the resources within park boundaries.

### **Issue 6: Provide More Information on Non-Point Source Control**

**Representative Comment 1:** Sections are distressingly sparse and uninformative. Any plans to address the constant problem of surface runoff and other non-point source pollution associated with allowing car traffic through the park are only vaguely described. (rocr0332.007)

**Response:** The general management plan includes a commitment to reduce non-point source pollution originating in the park, including automobile pollutants that are deposited on roadways and can be transported into streams. However, the details on how this commitment and the many other goals and commitments in the plan will be implemented are normally included in specific resource management plans.

As described on page 119 of the draft general management plan, the study entitled *Best Management Practices for Water Quality, Rock Creek Park* (URS Greiner Woodward Clyde 1999) identified roads and parking lots among the facilities that are sources of water pollution in Rock Creek Park. This report provided details on best management practices to remediate or prevent this pollution. The National Park Service has been implementing the recommended best management practices and will continue to do so.

### **Issue 7: Address Leaking Underground Storage Tanks**

**Representative Comment 1:** The Berger Report on Klinge Road identified more than 40 underground leaking storage tanks in Rock Creek Park. It does not appear that the National Park Service has done its job in eradicating those leaks. (rocr2769.028)

**Response:** The referenced report refers to underground storage tanks located within a half-mile of Rock Creek Park. There are no leaking underground storage tanks within the boundaries of Rock Creek Park or the Rock Creek and Potomac Parkway. The National Park Service is not responsible for the condition of property outside its boundaries.

## WETLANDS AND FLOODPLAINS

### Issue 1: Trails Constructed in Floodplains Could Have Adverse Impacts

**Representative Comment 1:** The District of Columbia, Department of Health, Bureau of Environmental Quality (BEQ) agrees that trails should be re-routed out of the 100-year floodplain. BEQ suggests that no new trails be constructed within the 100-year floodplain. If trails were constructed within the floodplain, this could be considered a long-term impact, as it would decrease the infiltration area available for stream energy dissipation during a flood event area and potential infiltration/velocity reduction of runoff entering the stream. Also, construction of trails within the floodplain could impact stream meandering. (rocr1736.004)

**Response:** Prior to making any changes to the park's trail system, the National Park Service will prepare a trail plan for Rock Creek Park. The District of Columbia, Department of Health will be consulted during preparation of this plan for input on these concerns.

As a part of preparing the trail plan, the National Park Service will perform a trail study to determine optimal trail alignments that will minimize impacts of trails and avoid conflicts among visitors. The study will outline the standards to be used in trail design and construction and will include maps and costs for trail alternatives. As part of this process, the National Park Service will provide National Environmental Policy Act documentation, which will include opportunities for agency and public review and comment.

### Issue 2: Explain Why Some Features Are Allowed in Floodplains

Page 125 states that "Under NPS floodplain management guidelines, historic structures, picnic facilities, daytime parking facilities, roads, and trails are acceptable within the 100-year floodplain." EPA suggests explaining why these facilities are acceptable within the 100-year floodplain so as to warrant attention/rehabilitation to impacted sites. For instance, it is specifically stated that "Rehabilitation of the Peirce Mill complex would occur within the 100-year floodplain. This historic structure is allowed within the 100-year floodplain under NPS Floodplain Management Guidelines (NPS 1993a)." It is also stated that improving and possibly rerouting of the recreation trails along Rock Creek, portions of which are in the 100-year floodplain, is planned. Trail construction in a floodplain is acceptable under NPS Floodplain Management Guidelines (NPS 1993a)." (rocr2982.006)

**Response:** The text in the final environmental impact statement was changed to explain that trails are acceptable for installation within a floodplain because they would not change its flood-carrying capacity.

Detailed explanations of why historic structures are allowed within the 100-year floodplain in national parks are provided in the recently updated *Director's Order 77-2, Floodplain Management* (2003) and *Procedural Manual #77-2: Floodplain Management* (2002). Both of these are available from the NPS' Internet site. Briefly, moving a historic structure from the site where it was constructed would adversely affect the integrity of the property's location, design, setting, materials, workmanship, feeling, and/or association which together qualify the property for listing in the National Register of Historic Places. Using the Peirce Mill example from the comment,

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there is an integral association of a mill with flowing water. Moving the mill out of the floodplain would sever this association and have a major adverse impact on its integrity.

### DECIDUOUS FORESTS

#### **Issue 1: The BEQ Had Concerns about the Analysis**

All of the comments under this issue are from the District of Columbia, Department of Health Environmental Health Administration, Bureau of Environmental Quality (BEQ) (rocr1736.005)

**Comment 1:** We are particularly concerned with an issue that is not dealt with in the document - routine maintenance of the Park. There are several invasive species of plants and animals that are having a devastating effect upon many areas in and outside of the Park. Because the Park is surrounded by urban areas with impervious surfaces, storm flows have and are causing stream channel instability and a loss of habitat. Both of these issues are operation and maintenance issues. We believe that O&M budgets need to be increased in order to protect and improve the Park ecosystem.

**Response:** Following completion of the general management plan, the natural resources management plan for the park will be updated. This will include updating the plan for the management of invasive species. However, without adequate funding for control, invasive species will continue to be a problem. The National Park Service will continue to work with surrounding communities to improve management of storm water flows.

*Management Policies 2001* states that management actions, including the restoration of extirpated native species, the alteration of natural fire regimes, the control of invasive species, the management of endangered species, and the protection of air and water quality, should be attempted only when the knowledge and tools exist to accomplish clearly articulated goals. Exotic species will not be allowed to displace native species if displacement can be prevented.

**Comment 2:** *Regarding the Alternative A analysis on page 176:*

The amount of trail that is to be reconstructed vs. newly constructed is confusing. In the summary document, under Alts. A, C & D, upgrading of 9.8 miles of trail is mentioned. However, in this text, only around 3 miles of trail is specifically mentioned. Would the other trails not be in forested areas? Where are the impacts from these trails mentioned? Also, how is it a net of 500 ft. of new trail when the following sentence says 3,500 ft. of new trail?

**Response:** A new section, "Summary of Trail Improvements" was added to each of the action alternatives. The analysis under the "Deciduous Forests" impact topic was revised to clarify the lengths and areas of impacts.

The impact analysis only considered the trails within the forest zone that would be relocated because of problems such as steep slopes or severe erosion. Upgrades of trails along park roadways would occur in previously disturbed areas where there would be little need to remove trees or otherwise alter the vegetation or character of the deciduous forest. Similarly, constructing new trails along Piney Branch Parkway and other park roads would have a negligible effect on the park's deciduous forests. Some of the lands on which new trails would be aligned currently are

maintained as grasslands within the road right-of-way, and there would be no effects on deciduous forests in these areas. The wooded areas where new trail construction would occur would be on the forest margins, and careful trail design would avoid most tree removal and other activities that could alter the forest.

**Comment 3:** What type of material would be used on the foot/horse trail? BEQ would recommend that these trails be non-paved. For trails that are to be upgraded or relocated, the BEQ would also recommend that porous asphalt or other alternatives to traditional asphalt pavement be utilized.

**Response:** The National Park Service would welcome recommendations from the BEQ on porous materials that would provide the longevity and durability of asphalt.

**Comment 4:** Does the 4-5 acres refer to the area needed to rehabilitate the 3 miles of trail or other trail located elsewhere? Would monitoring occur to ensure areas become revegetated with native species? There is likely a non-native seed source within the park. BEQ would recommend replanting these areas with native tree species to prevent non-native regeneration and also monitoring of the site to ensure reforestation.

**Response:** The impact evaluation was revised to clarify the acreages that would be revegetated following trail construction. The trail plan that will be prepared before any changes to the trail system are made will include details regarding revegetation procedures and monitoring to ensure success.

**Comment 5:** *Regarding the Alternative A analysis on page 177 concerning effects on the riparian deciduous zone:*

What are the riparian zone dimensions, what would constitute a trail being within a riparian zone and what would be criteria for relocation? Also, how much of the 9.8 miles of trail is found within the riparian zone? Figures should be provided for the riparian trail as they were for the upland trails. BEQ recommends relocation of trails from riparian zones (a 50-foot buffer on each side of stream).

**Response:** Details such as these will be developed in the trail plan. However, it is already recognized that in some areas, it may not be possible to avoid riparian zones without getting into steeply sloping areas with high potential for erosion. The trail plan will identify these areas of concern and develop approaches to protect vegetation and soil resources at each of these sites. The planning process will include consultations with the District of Columbia, Department of Health to ensure their concerns are addressed and to take advantage of the extensive knowledge of their staff. As part of this process, the National Park Service will provide National Environmental Policy Act documentation, which will include opportunities for agency and public review and comment.

## **Issue 2: Provide Maps of Trails That Will Be Realigned**

**Representative Comment 1:** As stated within the Draft GMP/EIS (page 99), Alternative D proposes to improve the protection of the park's natural resources. In particular, poorly designed sections of foot and horse trails would be rerouted and abandoned trail sections would be restored to

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natural conditions. Those sections of the existing recreational trail slated for realignment should be clearly depicted on a map in the Final GMP/EIS to ensure the protection of natural resources. (rocr2982.004)

**Response:** Maps showing proposed changes in the trail system are beyond the scope of a general management plan and have not yet been developed. They will be part of the trail plan that was discussed in the preceding response. The U.S. Environmental Protection Agency and others will have the opportunity to review and comment on the trail plan as part of the National Environmental Policy Act evaluation of alternatives that will be prepared as part of the trail planning process.

### **Issue 3: Manage Invasive Species**

**Representative Comment 1:** I would like in the management plan a commitment to persist on this [management of invasive plant species]. There are going to be some of the species that are very difficult to eradicate. We pledge that as the Plant Society pledges itself to be of any assistance that we can on this. (rocr3135.002)

**Representative Comment 2:** There is a continued threat to the wild plants in the Park, as well as invasion by exotic species. A long-range plan to address these concerns would guide budget decisions. (rocr3027.007)

**Representative Comment 3:** The current discussion of invasive species control in the draft General Management Plan/Environmental Impact Statement for Rock Creek Park is vague and inadequate. The current draft GMP/EIS is too summary and greatly underestimates the negative impacts of invasive species on the Park's environment and aesthetic beauty: "The recent inventory of park vegetation also determined that 238 of the plant species were introduced species, not native to the area. Of this number, 42 species have been judged to be invasive exotic species that, unless controlled, are likely to spread and adversely affect native plant populations. Control of these invasive exotic plants is a serious problem in the park."

Specifically, the draft GMP/EIS should more explicitly identify that invasive species have a serious negative affect on native plant populations, tree health, soil stability, and can be a breeding ground for rodents. In addition, the aesthetic beauty of the Park is seriously compromised due to the invasive vines and plants that hamper viewing of native species in the Park.

The final GMP/EIS requires an assessment of those areas of the Park most affected by invasive species. The final GMP/EIS must map and catalog those areas of the Park that are affected by invasive species with an indication of which species are present and the severity of infestation. Attached is a list of invasive species from the Virginia Department of Conservation and Recreation which can be used as a starting point to catalog the invasive species with the most impact on the Park.

The seriousness of this issue requires that the NPS work with other Federal Agencies (e.g., National Invasive Species Council, [www.invasivespecies.gov/](http://www.invasivespecies.gov/)) and local governments (e.g., Arlington County is engaged in a invasive species removal in its parks including the spraying of English Ivy in Lubber Run park) before completion of the final GMP/EIS in order to: (1) better document and assess the dramatic negative impacts to the Park's health and beauty; and (2) identify control

and eradication measures for invasive species. NPS should collect input from these experts and other interested stakeholders and factor their recommendations into the final GMP/EIS. (rocr2900.002)

**Response:** Consistent with *Management Policies 2001*, the National Park Service has policies for managing against invasive plant species. These will be implemented regardless of the management direction included in the general management plan.

The level of detail requested in the last comment is too great for a general management plan. The park's management plan for invasive species will be updated as part of updating the natural resources management plan after the general management plan is finalized. The updated plan will include the types of information outlined in the last comment.

#### **Issue 4: Level of Impacts Is not Correct**

**Representative Comment 1:** Paving 9.5 miles of recreation trails or paving other trails would not be upgrading but instead would be destroying the natural walking and observation experience. Users of the park trails want to get away from pavement. Conversion of about a half acre of forested land to a new paved trail area "as well as disturbance of about 4 to 5 acres of forest for a trail construction zone" would not be minor nor short term effects, but would be major, long term adverse effects on the park. (rocr3026.003)

**Response:** Based on the intensity and duration thresholds presented on pages 175 and 176 of the draft environmental impact statement, the analysis is correct. The suggested changes were not made in the final environmental impact statement.

#### **Issue 5: Address Gypsy Moths and West Nile Virus**

**Representative Comment 1:** We have gypsy moths that have required aerial spraying. The West Nile Virus has also been reported in the area. Both of these present very real threats to the environment that seem to be overlooked. (rocr2769.029)

**Response:** Management of gypsy moths will be included in the update of the park's natural resources management plan, which will be prepared after the general management plan is finalized. West Nile virus appears to be an evolving condition that may not require management actions. This determination will be made when the outline for the natural resource management plan update is developed, based on the best information that is available at that time.

#### **Issue 6: Provide More Information on Forest Ecology and Health**

**Representative Comment 1:** The question now arises, How well are your beeches reproducing? Have the roadways and other openings let in enough light to encourage less shade tolerant trees to come in instead of reproduction by beech trees? This is important to find out if you are going to preserve the timber from injury and spoliation. It appears evident from this Draft Plan as well as from the previous Preliminary Alternative Scenarios that the planning team has an extremely limited knowledge of the significance of the resources and their ecology. (rocr3018.007)

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**Response:** The level of detail requested is too great for a general management plan. Indicators of forest health will be included in the updated natural resources management plan.

### **Issue 7: Protect the Park's Natural Features**

**Representative Comment 1:** The plan is vague regarding where the Park Police substation and the Park administrative offices are to be relocated. The Park Service should commit in the final document to build no new facilities in the Park for these purposes that would cause removal of mature trees, increase impervious surfaces, or otherwise degrade the Park's natural features. (rocr2925.017)

**Response:** The National Park Service cannot commit to such absolute statements. However, the National Park Service will commit to managing Rock Creek Park consistent with its mandate in the Organic Act, the establishing legislation for the park and parkway, and the park mission, mission goals, and servicewide mandates and policies presented in the "Management Direction or Guidance" section of the general management plan.

## PROTECTED AND RARE SPECIES

### **Issue 1: Management of Amphipods**

**Representative Comment 1:** Sections are distressingly sparse and uninformative. The document mentions the awareness by NPS that the endangered Hays spring amphipod resides in the park and thus requires special protections, but those protections are not detailed. Also, this amphipod was only recently discovered in Rock Creek Park in 1998. What measures are being taken by NPS to better inventory park wildlife and thus ensure the protection of other, perhaps as yet undiscovered, species within the park? (rocr0332.007)

**Response:** The general management plan includes a commitment to protect and manage this endangered species. However, details on how this commitment and the many other goals and commitments in the plan will be implemented are typically included in the resource management plan. The National Park Service will continue to coordinate closely with the U.S. Fish and Wildlife Service to determine the best ways to protect this endangered species.

The best method to protect other, perhaps as yet undiscovered, species within the park is to protect the unusual or unique habitats that could be supporting special concern species. These habitats, such as the seeps that support the Hays spring amphipod, have been mapped and are actively managed to maintain their unique characteristics. The environmental and siting studies that are conducted prior to constructing or relocating any park facilities include evaluations to ensure that the proposed action would not adversely affect these special habitats.

The park's natural resources management plan includes implementation information on identifying and managing native species, including endangered, other protected, and rare species. This plan will be updated after the general management plan is completed.

**Representative Comment 2:** Protection of the federally endangered Hays spring amphipod warrants attention as well as ensuring that historic resources will not be adversely affected. (Impacts

to these resources were the reason that construction of a paved recreation trail as well as converting the streamside segment of the Blackhorse Trail and construction of a parallel horse trail to replace the Blackhorse Trail were eliminated from further analysis.) Therefore, rerouting of horse trails should be outlined in the Final GMP/EIS to ensure the protection of valued resources. (rocr2982.005)

**Response:** Details, such as the segments of horse trails that would be rerouted, will be developed during the preparation of a trail plan following completion of the environmental impact statement.

The endangered Hays spring amphipod is of special concern to the National Park Service. We constantly are monitoring around this site to ensure its continued protection. Impacts will be evaluated in the environmental impact statement that will be prepared as part of the trail plan process to ensure the protection of this endangered species.

**Representative Comment 3:** Only one federally listed species, the endangered Hays spring amphipod is known to inhabit the park. Ironically, these groundwater amphipods are known to be highly sensitive to environmental pollution, but there is an abundance of these amphipods in the park. This would seem to undercut the argument that water pollution threatens the environment. It looks like Rock Creek Park is alive and well. (rocr2769.030)

**Response:** Comment noted.

## **Issue 2: Add Information on Protected and Rare Species of Birds**

**Comments:** Although they do not make a direct statement, the comments that identified the presence of special concern bird species in the park (rocr3024.001, rocr3025.004, and rocr3106.002) imply that the analysis of protected and rare species is inadequate because it does not consider this group of special concern species.

**Response:** Information on special concern bird species was added to the “Affected Environment” section.

## **OTHER NATIVE WILDLIFE**

### **Issue 1: Impact Intensity from Habitat Loss Was Inaccurate**

**Representative Comment 1:** The establishing legislation for RCP clearly states that timber and animals are to be preserved from injury or spoliation; yet in Table 1, wildlife is not deemed as being critical to the park significance and character. Several statements exist in the GMP that casually say the effects on wildlife are temporary and could be controlled by best management practices. How can effects be short term when a den tree or a nest is destroyed. Yes, animals may move when disturbed, but some may not return when disturbance is over. What effect will displaced animals have on habitats of other animals that are already stressed by the small, island nature of the park habitat. (rocr2981.011)

**Response:** Most of the wildlife species in the park are highly tolerant of human disturbance and are adaptable to a wide range of conditions. These species probably would not be affected by the

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limited area of increased plant diversity that would result along trail construction corridors until the mature forest was restored.

Site-specific surveys for high-value wildlife habitat, including trees with holes used for nests or dens, would be conducted as part of the detailed planning for projects such as trail construction. The preferred approach would be avoidance of any such resources that were discovered. If this was not practical, vegetation removal would be conducted in the winter to avoid harm to young animals. Mitigation measures such as nest boxes or artificial den sites could be installed to replace important wildlife resources.

All proposed construction projects would include preparation of National Environmental Policy Act documentation with opportunities for public review and comment.

The impact analysis was reviewed and, based on these considerations, no changes in the impact intensity were made.

### **Issue 2: Analysis of Effects on Birds Was Inadequate**

**Representative Comment 1:** New construction in this environmentally sensitive area would have a very negative and disruptive effect on the park generally and in particular on the birds of the park, especially those most vulnerable to the destruction of an important feeding and resting area. (rocr0826.001)

**Response:** The analysis of impacts in the final environmental impact statement was expanded to include greater consideration of birds.

### **Issue 3: Loss of Bird Habitat Would Occur in the Maintenance Yard**

**Representative Comment 1:** We're very concerned about the potential for building the new administrative and U.S. Park Police headquarters at the maintenance yard, which as [an earlier speaker] said, is an important habitat for birds. And since field habitat only represents 1.5 percent of the park habitat, I think it would be a good idea to enhance it and not destroy it. (rocr3105.007)

**Representative Comment 2:** I just would end by absolutely recommending the preservation and enhancement of a rough meadow in the maintenance yard as a critical environmental habitat and absolutely do not move forward with the proposed destruction of this habitat as outlined on page 182 of your management plan. (rocr3106.003)

**Representative Comment 3:** Even to consider building a new administration building in the maintenance yard (described in Claudia Wild's 1993 book on bird-finding in Washington) as "the best migrant trap in the city" and the "most important field habitat for migratory birds in DC" shows an amazing lack of awareness of the importance of this part of Rock Creek Park to migrants. While I recognize that this is not a preferred alternative, even to suggest it is frightening for what it reveals about the level of awareness by the individuals who developed the plan. In fact, this type of less-managed (i.e., less mowed and groomed) edge habitat found in the back of the maintenance yard is vital for bird feeding and resting during migration, and every effort should be made to increase this habitat in Rock Creek. There are many areas now regularly mowed which serve no specific recreational use and which could support small areas of native

shrubs and forbs. Other types of wildlife would also benefit from this management practice. (rocr0644.005)

**Representative Comment 4:** While the rough meadow area of the Maintenance Yard appears untidy and superficially may appear to be of very low habitat value, the opposite is actually the case. Most neotropical migrants fly during the night and at dawn are searching for suitable habitat to feed and rest during the daytime. Rock Creek Park's forest and adjacent vegetation provides vital fruit, seeds and insects for migrants. Particularly attractive to many species are the bushes, vines and grasses found in meadow and forest edge environments, which are increasingly rare in Washington's urban setting. The Maintenance Yard, cited in Claudia Wild's book [*Finding Birds in the National Capital Area*] as the "best field habitat in the Park," is a prime example of this type of environment. This is based not only on over ten years of detailed survey work but on the observations of many other individuals. It is perhaps not unexpected that some of the most unusual migrants ever recorded in Rock Creek have appeared (and stayed, sometimes for many days) in this rich feeding area. These include clay-colored sparrow, lark sparrow, sedge wren and mountain bluebird. Rather than destroying this unique area, it is recommended the National Park Service take steps to preserve and enhance this habitat. (rocr3024.002)

**Response:** The final environmental impact statement was revised to clarify that the park maintenance yard and H-3 area were just candidate sites. It also made clear that new in-park facilities would be constructed only if suitable commercial space could not be found outside the park and after a siting study that emphasized environmental concerns that determined the best in-park locations for the facilities.

If construction in the maintenance area was necessary, it would be restricted to the footprint of the existing impervious surfaces in the developed area on the west side of the maintenance area. This could involve, for example, replacing the existing structure with a multi-story building.

The final environmental impact statement also was revised to include a commitment to improve management of the park, specifically including the maintenance yard, for birds. Implementation details will be included in the updated natural resources management plan, which will be prepared after the general management plan is approved.

#### **Issue 4: Planning for Wildlife Management Was Inadequate**

**Representative Comment 1:** The Draft General Management Plan should describe the deer population and develop reasonable carrying capacity estimates for deer relative to other important components of the ecosystem. I realize that all of the deer's natural predators are gone and that hunting in National Parks is against the law. Nevertheless, under the circumstances of this highly-urbanized park, the Park Service should consider population control measures for deer in the Park. If you don't implement such a program, at some point many deer will die of disease, starvation, and/or as roadkills. (rocr2901.008)

**Representative Comment 2:** Most birdwatchers would appreciate better attention to management of vegetation, protection of important migrant bird concentration areas (such as the Maintenance Yard) and other actions to improve habitat. They would also appreciate some common sense/courtesy — such as not mowing the major areas where birders congregate until after the peak observation times (that is, mid to late morning) during migration season. Control of off-lead

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dogs (which doesn't happen) and removal of free-ranging cats from the stable area would also enhance well-being of native wildlife, including birds. (rocr3025.010)

**Representative Comment 3:** I am a birder and I wish that the needs of the birds, especially the migratory birds, would be noted and included in the Park Planning. Rock Creek is an very important flyway for migrating birds and with continued destruction of trees elsewhere it becomes even more critical to their survival. Specific procedures would include things like: 1) implementing more no-mow sections, 2) removal of the extensive overgrowth of burdock (whose burrs can catch and kill birds), i.e. in the maintenance yard 3) no additional buildings near the maintenance yard. (rocr0649.001)

**Response:** The park's natural resources management will be updated following the completion of the general management plan. This document will include the types of details requested in these comments.

### **Issue 5: Analysis of Roadway Impacts on Wildlife Was Inadequate**

**Representative Comment 1:** All statements declaring that road kill is not believed to be adversely affecting the populations of any species that resides in the park and parkway vicinity are merely speculative. Animal species may be abundant region wide but within the park boundaries may be rare. Road kill records kept by the park's resource management staff show trends that would indicate that several species are declining park wide. For instance, eastern box turtle, opossum, and gray fox are all becoming exceedingly less common. Observation records of these animals are also showing the same trend. It may be true that other factors may be at work against these animals, but certainly road kills is more significant than stated in the GMP. (rocr2981.011)

**Representative Comment 2:** The adverse effects of roads and trails on wildlife populations have been documented in several studies. Aside from the obvious problem of automobile collisions, roads (and even foot trails) can disrupt migration and movement of many animals, especially amphibians and reptiles, but also including many mammals. The current motorized traffic has probably contributed to the extirpation of the striped skunk and the reduction in the populations of the eastern box turtle, large snakes, opossums, and chipmunks. Natural parks embedded within an urban landscape often act as island refuges for wildlife species. Bisecting the park with a heavily traveled road will concentrate animals into smaller areas, promoting over-population and the environmental degradation related to that. (I will provide citations supporting these statements.) (rocr2980.004)

**Response:** The impact analysis was reviewed based on these types of comments and was determined to be adequate. No changes were made in the final environmental impact statement.

### **Issue 6: Attention to Effects of Invasive Species and Their Management Was Inadequate**

**Representative Comment 1:** We are particularly concerned with an issue that is not dealt with in the document - routine maintenance of the Park. There are several invasive species of plants and animals that are having a devastating effect upon many areas in and outside of the Park. (rocr1736.001)

**Representative Comment 2:** The urban pollution and runoff problems affect the fish populations, but so do free-roaming domestic cats, which prey on local populations of songbirds, squirrel and small mammals. Are we planning to do away with the domestic cats? (rocr2769.031)

**Representative Comment 3:** We support continued measures to contain the threat of invasive species, although we would prefer that it be formulated under the principles of integrated pest management. That would place the selective application of herbicides in limited portions of the park as a last resort after less toxic alternatives have been evaluated. (rocr0829.001)

**Response:** Parks are required to prepare integrated pest management plans, which include the control of invasive species and feral animals. This will be included in the next update of the park's natural resources management plan. Herbicide and pesticide use already is strictly limited and these chemicals are used only when other methods prove ineffective.

## ARCHEOLOGICAL RESOURCES

### Issue 1: Improve Management of Lesser-Known Sites

**Representative Comment 1:** [The National Park Service should provide] more far-reaching preservation and restoration of the park's less known cultural sites, such as the Miller Cabin, Soapstone Quarry, other mill locations, spring houses and similar outbuildings, and other archeological sites. (rocr0315.004)

**Response:** The National Park Service currently is in the second year of a four-year archeological identification and evaluation study of the park. Measures for improved management will be developed after this inventory provides a complete picture of the park's archeological resources. Consistent with its mandate, the National Park Service will continue to preserve and protect the park's archeological resources, historic structures, and cultural landscapes for future use and interpretation.

## HISTORIC RESOURCES AND CULTURAL LANDSCAPES

### Issue 1: Clarify Management of Peirce Mill

**Representative Comment 1:** The various alternative plans presented in the GMP are virtually identical in their references to Peirce Mill. However, the report fails to mention that the objective of the project is to restore the mill to operation. (rocr1581.001)

**Response:** Peirce Mill management is not a component of the general management plan. The approach for managing this facility has already been determined and would not change regardless of the alternative selected in the general management plan.

As noted in the draft general management plan, the National Park Service recently completed a draft historic structures report for Peirce Mill. This draft document is a professional analysis of the structure and surrounding areas that examined a complete range of management approaches, including restoration of the mill to operations.

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The recommendation from the report, which will be implemented by the National Park Service, is to rehabilitate Peirce Mill to provide a historically accurate representation of a typical mill complex in the region. This will include restoring the milling machinery to a fully operable condition. However, because the mill race was relocated away from the site many years ago, it will not be possible to restore operation of the mill using water power. The landscape of the complex will be rehabilitated to retain the historic character while allowing continued use. The final general management plan was revised to better clarify the upcoming action for Peirce Mill.

### **Issue 2: Provide More Information on Treatment and Reuse of Historic Structures**

**Representative Comment 1:** The Plan does not provide adequate guidance on how Peirce Mill, Klingle Mansion and the Lodge House will be restored and used in the future.

- While the GMP budgets \$1.73 million in capital costs for Peirce Mill, this is insufficient funding to restore full operation of the mill. When restored again to operation, the Mill can serve as an outstanding example of one of the earliest industrial processes. Peirce Mill is a key cultural resource in Rock Creek Park and a popular visitor site since its restoration in 1935. Although the Rock Creek Park staff developed an educational program for schools entitled Milestones to Millstones, the milling machinery has not been repaired since it failed in 1993.
- We strongly urge development of a plan, including funding, for the use of Klingle Mansion and the Lodge House before any action is taken to lease or change uses. This requirement should be included in the GMP.
- The GMP should clearly state that any changes proposed to historical resources will require compliance with Section 106 of the National Historic Preservation Act. Other changes within the park may require additional environmental reviews and impact statements under the NEPA. (rocr3030.011)

**Response:** As described under Issue 1, Peirce Mill, including its milling machinery, will be restored to a fully operable condition. However, because the mill race was relocated away from the site many years ago, it will not be possible to restore operation of the mill using water power.

The Peirce-Klingle Mansion and Lodge House will undergo cultural resource studies to determine their condition and to what level they should be preserved. This standard practice for historic structures involves a detailed investigation that is beyond the scope of a general management plan. No changes at these sites would occur until these studies were completed.

The cultural resource management requirements described on pages 23 and 24 of the draft general management plan clearly state that any changes proposed to cultural resources will comply with the National Historic Preservation Act, including Section 106. As a broad management document, the general management plan and environmental impact statement can provide only partial completion of the Section 106 requirements for the cultural resources in the park. Additional Section 106 compliance will be done at a later date in association with implementing individual projects. This will include submitting preliminary plans and drawings for the adaptive use of the structures to the state historic preservation officer for review and comment.

**Issue 3: Traffic Management Could Affect Use and Appreciation of Historic Resources**

**Representative Comment 1:** The draft appendix Table F1 is a list of resources that contribute to the significance of the Rock Creek Historic District. Included on the list is the Sixteenth Street Bridge and the circulation network of historic roads and trails. Alternative D would place more of a volume of traffic on 16th Street and Blagden Avenue. (rocr2769.032)

**Representative Comment 2:** All of our parkways in Rock Creek Park are fundamental components of the Park's original design by Frederick Law Olmsted, Jr. and intended for motor vehicle use specially in order to provide broad-based access to the Park for ALL citizens. By closing Beach Drive you take away our parkway and their use which are important parts of the historic heritage and cultural landscape of our city. (rocr0750.002)

**Representative Comment 3:** Further restricting Beach Drive is another step toward completely eliminating the traditional and historic experience of touring Rock Creek Park, and also would rob the public of cultural resources that so many DC residents and visitors have enjoyed and cherished for nearly 100 years. (rocr0452.005)

**Response:** Comments were noted.

**Issue 4: Management of Cultural Landscapes Would Affect Natural Resources**

**Representative Comment 1:** Current cultural and otherwise pressures to cut down trees to open up vistas on long past eras or activities such as the rock-mounted preacher are detrimental to present and future existence of the natural and environmental elements of the park and to the natural types of recreation. (rocr3026.001)

**Response:** Goals of the park's natural and cultural resource management plans include balancing these types of resources in a way that does not adversely affect either.

**TRADITIONAL PARK CHARACTER AND VISITOR EXPERIENCE**

**Issue 1: Management Would Change the Park Character and Visitor Experience**

**Representative Comments:** Most of the comments on traditional park character and visitor experience were general statements regarding the writer's perceived effects of the alternatives. For example, commenters commonly said that one or more of the alternatives would:

- Serve (or exclude) one population or another. (rocr0309.003)
- Attract (or deter) visits by specified groups of people. (rocr0551.004)
- Be a benefit (or detriment) to specified groups of people. (rocr0523.003)
- Enhance (or decrease) the quality of life for people in the Washington metropolitan area. (rocr0331.002)

## ENVIRONMENTAL CONSEQUENCES

- Provide (or eliminate) recreational, relaxation, and/or decompression values to visitors who travel along Beach Drive through the park. (rocr0366.001)
- Give (or deprive) visitors of a quiet place where they could escape all the noise and stress. (rocr0623.002)
- Provide (or deny) access to the creek and gorge, the availability of which are among the main pleasures of the park. (rocr1533.003)
- Increase (or decrease) their personal convenience in using the park. (rocr1718.003)

**Response:** As demonstrated by these comments, effects of management actions on traditional park character and visitor experience vary widely based on the perceptions of individuals. All of these comments were noted.

### **Issue 2: Analysis of Effects Was Inadequate**

**Representative Comment 1:** The Draft GMP/EIS fails to provide adequate analysis of potential recreational benefits of proposed closure. (U.S. Representative Chris Van Hollen, rocr2994.010).

**Response:** The text of the final environmental impact statement was changed to better explain the recreational benefits of Beach Drive closures and identify the intensity of this impact.

**Representative Comment 2:** The National Park Service also claims that its proposed road closure would enhance educational outreach programs. This argument is fallacious. Beach Drive is needed in order to get those groups to the various picnic areas and parking lots from which they can then take trails into the woods. (rocr0764.008)

**Response:** All park facilities, including picnic areas and parking lots, would continue to be accessible by automobile under any of the alternatives.

### **Issue 3: The Impact Determinations Are Unsupported**

**Representative Comment 1:** The RCP Superintendent is arguing that there is a potential adverse environmental impact warranting a partial closure of Beach Drive. The Superintendent's claims are opposite those of other environmental authorities. The NPS should respond to environmental threats to the Nation's parks, but should not manufacture information when the threats to public safety and public access are as high as they are in this case. (rocr1709.004)

**Response:** Concerns about existing conditions and the development of the alternatives in the general management plan to manage traffic were based on public scoping and the analysis of data by many professionals within and outside the National Park Service. The environmental effects disclosed in the environmental impact statement were identified and supported by subject matter experts, not the park superintendent.

**Issue 4: Findings of Impact Intensities Are Incorrect**

**Representative Comment 1:** Paving 9.5 miles of recreation trails or paving other trails would not be upgrading but instead would be destroying the natural walking and observation experience. Users of the park trails want to get away from pavement. Conversion of about a half acre of forested land to a new paved trail area "as well as disturbance of about 4 to 5 acres of forest for a trail construction zone" would not be minor nor short term effects, but would be major, long term adverse effects on the park. (rocr3026.003)

**Response:** The impact intensities described in the environmental impact statement are consistent with the intensity thresholds provided under the "Methodology" heading in this section. A more detailed analysis of impacts will be conducted in a project-specific National Environmental Policy Act compliance document prepared as part of the trail plan.

**Representative Comment 2:** In its discussion of the impacts of Plan C on traditional park character and visitor experience, the Park Service states that "Permanent closure of sections of Beach Drive would eliminate the traditional visitor experience of automobile touring along the length of the park" (page 232). "This would be a major adverse impact on the traditional visitor experience," says the Park Service. However, automobile touring was not specified as a use for the park in its establishing legislation of 1890 (before automobiles were available). There is no mandate that automobile touring be provided for in Rock Creek Park, and in fact such access could be replaced by a well-run system of public transit, pedestrian and bicycle access. (rocr0332.005)

On page 142 of the draft document, it is stated that between 1991 and 1997, out of a total of 14,464,000 annual visitors to the park, 12,389,000 were "Nonrecreational (commuters)" and only 2,075,000 were "Recreational." I assume that most people would consider automobile touring to be a recreational rather than commuter activity. If that is the case, then how can closing Beach Drive and eliminating automobile touring be considered a "major impact on the traditional visitor experience" if 84% of visitors are in fact nonrecreational commuters? According to the Park Service's numbers, the current traditional visitor experience appears to be commuting through the park to get to work, not automobile touring in order to enjoy the scenery. (rocr0332.006)

**Response:** An activity does not have to be identified in a park's establishing legislation or occur over a long time to be part of the traditional visitor experience. For example, in-line skating was not included in the Rock Creek Park establishing legislation and has been popularized only since 1986 ([www.rollerskatingmuseum.com](http://www.rollerskatingmuseum.com)). However, in less than 2 decades, this activity has become part of the park's traditional visitor experience. In contrast, automobile touring on Beach Drive has been photographically documented for approximately 100 years and currently represents an estimated 80 percent of park use. Based on the impact threshold criteria defined in the "Methodology" section, the finding of a major adverse impact from eliminating automobile touring along the length of the park on the traditional visitor experience was appropriate.

The June 2004 traffic study conducted by the National Park Service demonstrated that some of the automobile travel through the park on Beach Drive on weekdays, including during both rush hours, is not time effective. In these cases, the driver could have selected another route, most of which were outside the park, that would have reduced the trip duration. This suggests that some of the drivers who use Beach Drive do so for its recreational and aesthetic qualities rather than for its efficiency as a commuter route.

## ENVIRONMENTAL CONSEQUENCES

Current traffic monitoring methods cannot differentiate people who are driving through the park to get from one place to another from those who choose to drive through the park for the quality of the experience, even if they do not stop or get out of their cars. Permanent closures of Beach Drive would cause a major impact on the visitor experience of the latter group.

### **Issue 5: Analysis Should Consider the Park Purpose and NPS Mandate**

**Representative Comment 1:** Balance of factors. The draft GMP seems to pay a lot of attention to effects of traffic on roads outside the Park. While these effects are not irrelevant to the decision, ultimately a decision involving trade-offs must assign different weights to different factors. The Park Service should assign great weight to the recreational use of the Park, and minimal weight to traffic flows outside the Park. In part, this arises from the fact that the purpose of a National Park is to serve as a park, not as a commuter highway.

**Response:** In selecting the preferred alternative for the final environmental impact statement, the National Park Service used a standard procedure, called “Choosing by Advantages,” to evaluate the benefits of the various components of the alternatives. Protection of the park’s and parkway’s cultural and natural resources would be managed much the same under all of the action alternatives. Therefore, providing for public use and enjoyment of park resources was identified as the most important factor in identifying advantages among the alternatives.

The “Methodology” section at the beginning of the analysis of impacts on traditional park character and visitor experience in Alternative A was modified to describe the evaluation process and the impact thresholds. Results based on “Choosing by Advantages” were added to the impact analysis of each of the alternatives in the final environmental impact statement.

### **Issue 6: Alternative D is Contrary to the Park’s Purpose**

**Representative Comment 1:** Another key point is the fact that Beach Drive was not designed for moving traffic through the park but instead to give people access to the park. The National Park Service itself recognizes that Non-Recreational use of park (i.e., commuters in motor vehicles) is a “secondary purpose” permitted only if it does not pose an undue threat to visitor safety, harm the park’s resources or create excessive congestion. (id. at p. 55). This conclusion seems to be at odds with the National Park Service’s choice of Alternative D, which essentially grants commuters a special use permit to be the sole users of Beach Drive during the morning and evening rush hours. (rocr2754.005)

**Response:** In the park’s 1890 establishing legislation, Congress instructed park managers “to lay out and prepare roadways and bridle paths, to be used for driving and for horseback riding.” At that time, the automobile was in its infancy (the first practical model was built in Germany 1889 based on German patents filed in 1886) and the phrase “for driving” referred to a horse and carriage. However, there was no stipulation that the roads in the park were to be available exclusively for horse-drawn vehicles or for recreational purposes.

Subsequently, Congress authorized construction of the Rock Creek and Potomac Parkway (1913) to connect Rock Creek Park and the National Zoo with Potomac Park, and installation of the zoo tunnel (1966) to relieve traffic congestion around the zoo. Together, these actions by Congress

provided an automobile route through the park from the Maryland state line to the monumental core of the city. These past decisions by Congress resulted in the current use of park roads for nonrecreational purposes as well as providing visitors with access to the park.

While it is true that Beach Drive is a park road, over the years it has been carrying city traffic. Alternative D was developed as a way of balancing city concerns with the park's establishing legislation and NPS' mandates. It does not grant any kind of special use permit to anyone. It also does not accommodate commuter traffic to an extent any greater than Alternative A or B.

**Representative Comment 2:** [Alternative D] also directly and seriously undercuts the legislated purpose of connecting the north and south parts of the Park with the Zoo. (U.S. Representative Chris Van Hollen, rocr2994.006)

**Response:** The 1890 and 1913 acts that respectively authorized Rock Creek Park and the Rock Creek and Potomac Parkway are included in Appendix A of the draft general management plan and environmental impact statement.

- The 1890 act does not mention the zoo (which did not exist at that time). With regard to transportation, park managers were instructed to “lay out and prepare roadways and bridle paths . . . and footways” without specifying what they were supposed to connect.
- The 1913 act authorized the United States to acquire the lands to be used for the Rock Creek and Potomac Parkway “for the purpose of . . . connecting Potomac Park with the Zoological Park and Rock Creek Park.”

The connection between the north and south parts of the park via automobile would be maintained under any of the management alternatives in the draft general management plan.

### **Issue 7: Analysis Should Consider Changing Demographics**

**Representative Comment 1:** The interpretation recommendations in the guide are very lacking. There is no analysis to back them up. I see 5 pages of information that describes the population surrounding the park. I don't see a serious analysis of the demographic transfer from today to 2020, nor we look at what the varied populations around the park will want and need in the future. We really would like to see the education and interpretation programs address that. (rocr3093.002)

**Response:** The National Park Service used information provided by other government agencies that specialize in demographic analyses and forecasting to characterize current and future populations that will be served by the park.

The general management plan identifies goals to protect park resources and ensure visitor enjoyment. It also outlines approaches that can be used to achieve the stated goals. The effectiveness of the approaches in meeting the park's goals is monitored through periodic visitor use surveys. Based on the results, approaches are adjusted as needed in a process called adaptive management. Through surveys and adaptive management, the National Park Service adjusts programs to meet needs more frequently than the 15-year timeframe suggested here.

## ENVIRONMENTAL CONSEQUENCES

Education and interpretation is not a general management plan issue. Interpretive planning is provided by the NPS resource center at Harper's Ferry based on regular assessments of park needs. An interpretive plan for Rock Creek Park will be prepared after the general management plan is approved.

### **Issue 8: Analysis Should Include the Maryland Part of the Park**

**Representative Comment 1:** In the Montgomery County portion of the Park the bike and walking trails are used very little during the hours of 9:30-3:30 on weekdays the proposed times for closure. (rocr2999.007)

**Response:** As shown on the Region map at the beginning of the final general management plan, the national park's northern boundary is at the border of Washington, D.C. and the state of Maryland. Rock Creek Park does not extend into Montgomery County. The park area in Maryland is the similarly named Rock Creek Regional Park, which is administered by the Maryland-National Capital Park and Planning Commission. The National Park Service does not have any jurisdiction over this Montgomery County park and the general management plan would not apply to any lands in Maryland.

### **Issue 9: A Study Is Needed to Estimate Future Use**

**Representative Comment 1:** Has the National Park Service conducted any independent "market studies" to determine just how many people are waiting to use the newly closed road from 9:30 ant - 3:30 pm weekdays? (rocr2807.003)

**Representative Comment 2:** The Park Service has not indicated to the public, nor has it demonstrated that a study has been conducted to quantify, how many people would use this closed portion of Beach Drive. The Park Service has not indicated how many people would use this closed roadway in the various weather conditions presented throughout the year. (rocr2885.010)

**Representative Comment 3:** Is there a significant change in the level of recreational use that would result during the periods that the sections of Beach Drive would be closed? (rocr0824.001)

**Representative Comment 4:** In contrast with the frequent assertions attributed to the Rock Creek Park Superintendent, there is no study (independent or otherwise) illustrating either a demand or adverse environmental impact on Rock Creek Park if Beach Drive remains open as it is today. During public comments, the RCP Superintendent has pledged to study the "increased use" of the Park by hikers, bikers and rollerbladers, after she closes Beach Drive. In a similarly disingenuous fashion, the Superintendent has also claimed a demand by the District of Columbia Public School System, but that demand cannot be documented. (rocr1709.004)

**Representative Comment 5:** I write to express my concern about Alternative D in the absence of information that significant numbers of residents would benefit. The Park Service has conducted no survey or offered any information regarding how many people might use the park during the proposed closure, and who they might be. (U.S. Representative Eleanor Holmes Norton, rocr2971.000)

**Response:** The National Park Service has not conducted studies to estimate nonmotorized recreation use that would result from closing Beach Drive to motorized vehicles. However, it is expected to be substantial, based on the large pool of potential weekday users (such as individuals who do not work a traditional Monday through Friday workday schedule, caregivers with small children, retired people, out-of-town visitors, and school groups), the more than 2,000 comments of support that the National Park Service received for Alternative D, and the many comments from people stating that they would use the park on weekdays for nonmotorized recreation if Beach Drive were closed to motorized vehicles.

The National Park Service was charged by Congress to not only provide visitation, but also to provide a high-quality experience. The final environmental impact statement was revised to include the results of an evaluation of the alternatives based on the quality, quantity, and spectrum of recreational opportunities.

With regard to whether significant numbers of residents would benefit, residents of Washington, D.C. would experience the same benefits that would be realized by all park uses.

#### **Issue 10: Current Park Use Does Not Justify Beach Drive Closure**

**Representative Comment 1:** On page 34 of the draft plan, it's stated that given relatively low use patterns (20-35 users per hour), construction of a paved recreation trail wouldn't be justified. How then do you justify closure of an entire road? (rocr2945.003)

**Response:** Current weekday counts of people using recreating along Beach Drive would not be a good indication of park use if Beach Drive closures were implemented, just as the current heavy weekend use of Beach Drive for nonmotorized recreation would not continue if weekend management of Beach Drive was changed to allow traffic.

#### **Issue 11: Accommodate Bikers with a Bike Path**

**Representative Comment 1:** By closing Beach Drive between 9:30 a.m. and 3:30 on weekdays the National Park Service appears willing to sacrifice neighborhood residents and divert at least 250 cars per hour so that a few bicyclists may use the upper part of Beach Drive. The National Park Service lists on page 35 of the draft plan several bike paths that exist above Broad Branch Road, including the Oregon Avenue, Bingham Road, Military Road and Glover-Ross Road trails. If the purpose of the closure of Beach Drive is to make the Park accessible to bikers, these alternative trails already provide that access. If the National Park Service does not wish to encourage bikers to use these trails, then the National Park Service should utilize the engineering expertise available today to construct a bike path that connects its existing bike paths with the path that Montgomery County has constructed to the D.C. line along Beach Drive. National Park Service studies in 1980 and 1990 each recommended the completion of such a bike path along Beach Drive. (page 34) The National Park Service's analysis in its draft plan, however, dismisses this proposal as being unjustifiable given the user numbers and patterns. If the user numbers and patterns do not support the completion of a bike path, they certainly do not support the closure of Beach Drive and conversion of that road into a bike path two-road lanes wide.

## ENVIRONMENTAL CONSEQUENCES

The National Park Service also claims that the construction of a bike path would be expensive. I note, however, that the capital costs of the other improvements that the National Park Service recommends in the draft plan would cost more than \$11 million, but the estimated cost of constructing the bike path would be approximately \$1 million. (rocr0764.004 and .005)

**Response:** A review of the goals that are listed in the description of each alternative shows that none of them identifies bicycle use. Instead, the focus is on recreation opportunities. The NPS' objective is to make the area attractive and safe for a wide range of nonmotorized recreation uses, including recreational bicycling. In two of the alternatives, this would be achieved through closures of Beach Drive to motorized vehicles. The trail plan that will tier from this general management plan will evaluate planning and design of all trails in the park.

### **Issue 12: Determine Effects by Comparing with Similar Experiences Elsewhere**

**Representative Comment 1:** In my day job I study city parks around the country and I pay particular attention to what goes on with cars in parks. And I think I can say that without exception every single car park that has eliminated portions or entirely eliminated cars from the park has been significantly improved by doing that.

Central Park in New York. Total turnaround in that park from being dangerous, shunned to being a fabulous place that's used by millions of people. Prospect Park, Piedmont Park in Atlanta, many other locations. (rocr3119.003)

**Representative Comment 2:** It's a natural tendency for people to oppose change. You see it all the time. When we began lobbying for the Capital Crescent Trail in 1986 the neighborhood along its route and almost every bureaucrat or politician in a decision making position opposed it. Once the trail was completed, every neighborhood loved us and thanked us and every politician wanted to take credit for it. I think this will be your experience if you do choose alternative D. (rocr3130.002)

**Response:** Comments were noted.

### **Issue 13: Horseback Riding in the Park Should Be Eliminated**

**Representative Comment 1:** I feel that horseback riding on trails in the Park should be stopped. I have been a regular weekly visitor to Rock Creek Park for about 15 years. Over this period I have observed that horses cause significant erosion and pollution in the Park. The muddy and excrement and urine polluted horse trails are a disgrace to the physical and aesthetic character of the Park. The amount of horse trail area far exceeds that of foot trails. It is nearly impossible to walk on the horse trails throughout most of the year. They are a mire of mud, poop, and piss. The negative environmental impact of a relatively few horseback riders on the park far exceeds the recreational value of their horses.

Why does the Park allow a few people to degrade the Park experience for the majority, and cause excessive environmental impact on Park resources? I am sure that maintaining the horse trails to mitigate erosion is very expensive (which has only a short term beneficial effect). This is a significant subsidy for the equestrian elite who use the horse trails in the Park.

While therapeutic riding for handicap people is one benefit of horses that I can accept, I rarely if ever actually see such people riding horses. Most of the people I see riding are white and middle class with no apparent physical handicap. Presumably they could afford to ride elsewhere.

I regularly see hoof prints and piles of horse dung on foot trails where horses are not permitted. I have observed horses running on several occasions in the Park. Once a horse was running without a rider. This is dangerous to other people recreating in the Park. To sum, the environmental impact of equestrian recreation in Rock Creek Park far exceeds its recreational value. (rocr0598.001)

**Response:** The legislation that established Rock Creek Park charged park managers “to lay out and prepare roadways and bridle paths, to be used for driving and for horseback riding, respectively.” Therefore, unless the National Park Service is directed otherwise by Congress, bridle paths will continue to be maintained for horseback riding.

The trail plan that will tier from this general management plan will evaluate planning and design of all trails in the park. This will include appropriate maintenance techniques and schedules based on use, including the use of the bridle paths by horses.

#### **Issue 14: Interpretation Should Be Considered as Part of the Visitor Experience**

**Representative Comment 1:** For more than 100 years, Washingtonians of all social strata have experienced the beauty of Rock Creek Park, but the draft general management plan reveals that there is no interpretive plan to guide interpretive programming in Rock Creek Park and that many opportunities for reaching the public in the park are unrealized. The Park has many lessons to teach--and the public, many to learn. Now is the time for the Service to make a commitment to completing an interpretive plan. (rocr0829.011)

**Representative Comment 2:** It is a waste of money to expand the Nature Center and Planetarium unless there is going to be an increased number of trained naturalist staff. At present the Center is closed most week days. The number of nature walks for the public has fallen drastically. The exhibits, while interesting, are the same as they were ten years ago. Without more operating budget, capital expansion is uncalled for. (rocr3027.005)

**Response:** The National Park Service will prepare an interpretive plan following completion of the general management plan. The final general management plan was modified to clarify that the action alternatives would include six new full-time staff positions for interpretation, education, and visitor contact. The action alternatives also could include upgrading the exhibits in the Rock Creek Nature Center and Planetarium.

#### **Issue 15: Other Experiences Should Have Been Considered**

**Representative Comment 1:** I support American Whitewater and agree that the General Management Plan for Rock Creek National Park is woefully inadequate in addressing management of Rock Creek. The Plan should specifically authorize canoeing and kayaking in recognition that these activities are a traditional use of the Park and have been for at least 35 years. (rocr0611.000)

## ENVIRONMENTAL CONSEQUENCES

**Response:** The intent to allow canoeing and kayaking to continue as a traditional visitor activity was included in the section “Alternatives or Actions Eliminated from Further Study” in the final general management plan.

**Representative Comment 2:** The draft plan barely mentions birdwatchers as a user group, and thus contains no suggestions to enhance the park experience for them. The park also is missing a unique opportunity to educate park visitors about the phenomenon of bird migration, which is taking place around them every year.

While this might not be as basic an issue as the first two, some rather low-cost actions could greatly enhance the park experience for birdwatchers and other nature lovers. Since birds are one of RCP’s most unique natural resources, birds should form a more important focus of park activities and public outreach. (rocr3025.007)

**Response:** The final general management plan and environmental impact statement was modified to include information on birding.

**Representative Comment 3:** Restricting through traffic will in fact connect upper Rock Creek Park and beyond all the way down to the National Mall enabling tourists on bicycles to enjoy Washington’s well known monuments as well as this natural area. (rocr3063.002)

**Response:** This effect was noted as a cumulative impact in the evaluation of effects for Alternative C and Alternative D.

### **Issue 14: Effects on Access for Individuals with Impaired Mobility**

This was not an impact topic in the draft general management plan and environmental impact statement. However, as discussed previously under “Planning Direction or Guidance, Issue 8: Americans with Disabilities Act Compliance,” more than 170 comments were received, expressing opinions that the various alternatives would either facilitate or impede access by the elderly, people with impaired mobility, families with small children, and others. Representative comments indicating a perceived adverse or beneficial effect were included in that section of this report.

Because of the large number of comments regarding access for individuals with impaired mobility, it was added to the final general management plan and environmental impact statement. Organizationally, it was placed within the Traditional Park Character and Visitor Experience impact topic in both the “Affected Environment” and “Environmental Consequences” sections.

**Representative Comment 1:** Further restricting the permissible uses of Beach Drive during the week strikes me as unfair to those citizens wishing to enjoy the park whose mobility requires a car. The new proposal would eliminate use of Beach Drive during the one segment of time when individuals with disabilities, and others who require a car for mobility, can enjoy the park without having to compete with rush-hour traffic. (U.S. Representative Chris Van Hollen, rocr2994.002)

**Response:** Even with closure of Beach Drive segments, all park facilities, such as picnic areas, parking lots, historical features, and trails, would continue to be available to visitors traveling by automobile. The only limitation would be on driving the length of Beach Drive between these facilities.

Many of the comments on the general management plan expressed support for road closures because closures would facilitate use of park facilities by visitors with impaired mobility. Specifically, people pointed out that seniors, visitors in wheelchairs, and parents with small children currently feel unsafe in the park on weekdays because of vehicle speed, vehicle numbers, and general congestion. Closure of segments of Beach Drive during the mid-day would enable these groups to get recreate safely on the broad, smooth, relatively level roadway.

**Representative Comment 2 :** We do not believe that alternative D which permits vehicular traffic during rush hour, but closes Beach Drive from 9:30 a.m. to 3:30 p.m. will serve the commuting and recreational needs of our residents. A large percentage of the Sheppard Park citizenry are senior citizens and families with young children, many of whom use the park for recreational purposes not only on weekends, but also during the week. Alternative D would deny the use of the portion of Beach Drive which leads to the picnic areas in the park for those citizens who cannot get there but by their own car. (rocr3085.004)

**Response:** Access to all of these areas would continue to be available via motorized vehicles under any of the alternatives.

## REGIONAL AND LOCAL TRANSPORTATION

### Issue 1: Alternatives Would Change Regional and Local Transportation

**Representative Comments:** Most of the comments on regional and local transportation were general statements regarding the effects of the alternatives. For example, commenters commonly said that one or more of the alternatives would:

- Change (or have little effect on) traffic outside of the park during the proposed closure times. (rocr0540.002)
- Facilitate (or impede) commuting by automobile. (rocr0597.002)
- Facilitate (or impede) commuting by bicycle. (rocr0309.005)
- Facilitate (or impede) non-commuting trips by automobile where the destination was not within the park. (rocr0910.002)
- Meet (or not meet) the needs of user groups because the proposed closure periods are convenient or inconvenient. (rocr0309.005)
- Increase (or decrease) travel times to destinations outside of the park. (rocr1451.001)
- Increase (or decrease) the convenience of travel to destinations outside of the park. (rocr0503.001)

Other common, non-specific assertions included the following.

- Automobile traffic in the park during the mid-day period is so light that other uses of the park are not adversely affected. (rocr0361.003)

## ENVIRONMENTAL CONSEQUENCES

- Commuter traffic is an inappropriate use for a national park road. (rocr0506.001)
- Particularly during the rush hours, cyclists impede traffic and are a hazard. (rocr0625.005)

**Response:** All of these comments were noted.

### **Issue 2: Traffic Data Are Out of Date**

**Representative Comment 1:** The Park Service appears not to have updated its traffic survey for 13 years, since 1990. Given the significance of the potential impacts on motorized park users of some alternatives, it seems highly inadequate to base a management plan on such outdated information. (rocr2850.005)

**Response:** The impact analysis in the final environmental impact statement was based on the most recent data currently available. These include:

- *2001 Traffic Volumes Map*. District of Columbia, Department of Transportation.
- Unpublished traffic counts provided by Richard Hawthorne, Chief of Transportation Planning, Maryland-National Capital Park and Planning Commission.
- *June 2004 Traffic Study for Rock Creek Park, Washington, D.C.*, prepared for National Park Service, Denver Service Center.

**Representative Comment 2:** While you failed to study the impact of cut-through traffic, we are grateful that the Maryland National Capital Parks and Planning Commission did conduct a limited traffic count which demonstrates that cut-through traffic in the Rollingwood Section of Chevy Chase surges by 45% on weekends between 9 a.m. to 3 p.m. This is not neighborhood traffic conducting weekend errands as some have suggested. It is clear to those of us who observe cars speeding through the neighborhood that most of this traffic is external to our community. The MNCPPC count also demonstrates that approximately 1,500 automobiles enter the park from the Beach Drive between 9 and 3. (rocr0822.002)

**Response:** The referenced data were obtained from the Maryland-National Capital Park and Planning Commission and were used in the updated analysis of impacts in the final environmental impact statement.

### **Issue 3: Impacts on Neighborhood Roads Were Inadequately Addressed**

**Representative Comment 1:** I also am concerned about the absence of information concerning the effect of rerouting automobile traffic from Beach Drive onto surrounding residential streets from 9:30 am-3:30 pm. The NPS conducted a four day weekday study of traffic patterns on Beach Drive from 9:00 am-4:00 pm. The Park Service may regard the number of vehicles-one to three cars per minute- as an insufficient traffic burden on residential streets when the neighborhood is viewed as a unit. What is not known is whether some streets might get the brunt of this traffic. It seems likely that drivers would discover the routes most convenient to themselves and if so, that certain residential streets might receive disproportionate concentrations of automobile traffic. More information would be needed regarding the impact that closing Beach Drive would have on the neighborhood streets that border the park, which routes cars would likely take, and

other effects on the city's major arteries (Connecticut Avenue, 16th Street) in order to ensure that side streets do not become proxies for Beach Drive. (Representative Eleanor Holmes Norton, rocr2971.003)

**Representative Comment 2:** Without a systematic assessment of the impact of diverting traffic from Beach Drive onto residential streets, it is inconceivable that the NPS would consider this alternative. (rocr0701.002)

**Representative Comment 3:** Traffic cutting through Forest Hills is not an imaginary issue. Those of us who have lived in Forest Hills within one block of Rock Creek Park for 25 years can speak from personal experience about the increased traffic flows from traffic cutting through to and from Connecticut Avenue. While the GMP concludes that there would be "no disproportionate routing of traffic to disadvantaged areas or ethnic neighborhoods," it says nothing about the actual re-routing of traffic to the surrounding neighborhoods on either side of the park, none of which are disadvantaged or ethnic. Nor could it because no contemporaneous traffic study was done. The failure to analyze this issue is again a fatal defect in the GMP. (rocr0372.006)

**Representative Comment 4:** I live on Daniel Road near Beach Drive. Every Saturday and Sunday, I see dozens of cars, driving to the gate closing the park and turning back, asking about other ways to get around. Now, if 5 to 8 cars a minute on a weekday were to do the same, it would not only create more confusion, but also congest the streets around Beach Drive, endangering our children, increasing the possibility of accidents, and polluting a residential area. (rocr0490.002)

**Representative Comment 5:** The EIS fails in two principal ways to adequately disclose safety and traffic impacts on neighborhood streets that will absorb traffic diverted off Beach Drive. First, you chose not to address any impact on neighborhoods in Montgomery County, Maryland. By your own terms, you looked only for impacts south of the Maryland/District line. This was inappropriate. CEQ regulations require the agency to describe the areas affected by the alternatives under consideration. Maryland neighborhoods, such as mine, will be directly impacted by the proposed closure of Beach Drive, because the northernmost gate closes the road at our doorstep. Traffic traveling south on Beach Drive from the East West Highway that encounters a gate, or traffic trying to get to Beach Drive to go north will cut through Montgomery County neighborhood streets to get back to a major Montgomery County artery. This proposal affects Montgomery County residents and you have a legal obligation to study and disclose those impacts. I believe the EIS is fatally flawed by this omission.

Second, the traffic analysis you do perform is inadequate, especially as regards neighborhood impacts. CEQ regulations make clear that economic and social effects of the proposed action must be analyzed. Your analysis of the safety and social aspects of traffic impacts is very perfunctory. NPS conducted very few actual traffic studies, none in Maryland neighborhoods. Its modeling is based on assumptions about how traffic will behave that are dated, untested, inapplicable, and in some cases just plain silly. For example, in the silly and untested category, you assume that all drivers will simply and uniformly move to 16th Street or to Connecticut Avenue. Drivers who do not know about the road closure, or who miss the rush hour window, and who are therefore probably late, disoriented, and annoyed will most certainly be racing through our neighborhoods trying to get back to a familiar major artery. It is also foreseeable that many drivers excluded from Beach Drive will simply, and perhaps regularly, travel down Beach Drive to Pinehurst and Daniel Road and cut through to Western Avenue or travel down Leland or Woodbine Streets to

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Brookville Road. We live there and we know that this happens. The EIS does nothing to reveal or analyze those reasonably foreseeable impacts on neighborhood streets and is therefore legally vulnerable.

Given that a high percentage of traffic accidents and fatalities occur on neighborhood streets, and that the victims of these accidents are disproportionately senior citizens and children, the neighborhoods deserve an honest, realistic, on-the-ground assessment and disclosure of the impacts of the proposed road closure, including increased traffic volumes and increased accident and fatality rates associated with those increased traffic volumes. The EIS did not provide any of this and is therefore legally vulnerable. (rocr3028.005 and 006)

**Response:** The National Park Service conducted a supplemental traffic study in June 2004 to specifically address effects on nearby streets during the mid-day period when Beach Drive would be closed under Alternative D. The results of this study were incorporated into the final environmental impact statement. The analysis of impacts in neighborhoods in the final environmental impact statement also was based on year 2003 traffic counts from the Maryland-National Capital Park and Planning Commission and 2001 traffic counts from the District of Columbia, Department of Transportation.

Following implementation of any of the alternatives, the National Park Service would work with cities to monitor neighborhoods of concern and coordinate with local groups to ensure that an increase in traffic on residential streets around the park did not occur in the long term. If problems were documented, the National Park Service would work with the city and neighborhood to develop effective solutions. For example, signs could be posted that would inform motorists of the closures and forestall their intent to enter the park on Beach Drive during closure periods. Other signs could direct disoriented drivers back to arterials without using residential streets. If undesirable patterns developed, such as that described in Representative Comment 3, traffic calming devices could be installed that would provide complete access to residents but would slow and inconvenience other drivers to the extent that they would choose other routes.

### **Issue 4: Traffic Analyses Were Inadequate, Incomplete, or Contained Errors**

**Representative Comment 1:** As you will note from the enclosed correspondence, [a number of my constituents] are particularly concerned that [Alternative D] would divert traffic into communities surrounding the park and create safety hazards. Moreover, they assert that the draft Environmental Impact Statement failed to adequately evaluate weekday traffic volumes for the preferred alternative in these neighborhoods. Indeed, it is my understanding that the draft plan only analyzed weekday traffic volumes for alternatives A, B, and C.

I ask that you give these concerns full and careful consideration and that the Park Service undertake additional traffic studies in these communities so that the full impacts of this proposal can be thoroughly and thoughtfully evaluated. (U.S. Senator Paul Sarbanes rocr2995.001)

**Response:** Alternative D was adequately analyzed. Consistent with Council on Environmental Quality (CEQ) guidance for implementing NEPA, information that was presented for the other alternatives was not repeated. Instead, the reader was referred to the previous analyses for alternatives that would have the same effects.

As described in the response to Issue 3, impacts on neighborhoods were reevaluated and updated in the final environmental impact statement using current traffic data from the District of Columbia, Department of Transportation; Maryland-National Capital Park and Planning Commission; and a 2004 traffic study conducted by the National Park Service.

**Representative Comment 2:** The GMP states that "nearby street intersections would be operating well below their capacities during the mid-day period.... While the diverted the mid-day traffic would be perceptible on some city streets, it would not cause any changes in levels of service or in traffic-related community character." At the same time it says that there would be a 20% reduction in traffic along Beach Drive between Joyce Road and Broad Branch Road. That 20% of traffic has to go somewhere. The logical places for it to go are first, along Broad Branch Road, and second through Forest Hills to Connecticut Avenue. Both of these problems have received insufficient consideration under the GMP, which is based on a long-outdated traffic study (1990). The model to which that data is then applied "has [not] been developed and validated . . . [for] corridor studies such as the Rock Creek Park project." (rocr0372.003)

**Response:** The supplemental traffic study conducted by the National Park Service in June 2004 analyzed traffic diversions in this area if mid-day closures of Beach Drive between Joyce Road and Broad Branch Road were implemented. The results were incorporated into the final environmental impact statement.

**Representative Comment 3:** The analysis of traffic impacts, as shown on pp. 263-264 of the draft GMP, appears to us to have exaggerated the impacts of Alternative D (and, most likely, the other alternatives) in 2020. Given the weight placed on traffic impacts in this debate, it is important that this element of your analysis be correct.

The primary problem appears to be calculations of traffic diverted from Beach Drive along the segment from Joyce Road to Broad Branch Road. Table 28 predicts that under Alternative D, a maximum of 970 vehicles per hour would be diverted in the midday period relative to Alternative B in 2020. Based on Table 29, these vehicles would presumably be diverted to Connecticut Ave., Wisconsin Ave., 16th Street, Georgia Ave., and Broad Branch Road. (The other routes listed in Table 29 all feed into one of these, so adding their totals would presumably double count diverted traffic.) Summing the vehicles on these diverted routes for Table 29 totals 1,840 vehicles per hour, much more than the 970 vehicles per hour available to be diverted. Table 29 also fails to allocate any of the diverted traffic to Ross Drive and Glover Road, further exaggerating the potential impacts on streets outside the Park.

The predicted traffic diverted to Broad Branch Road and Blagden Avenue are potentially the biggest traffic impacts associated with Alternative D. The draft GMP concludes (following Table 29 on p. 264) that "traffic volumes would more than double" on these two roads. Here, too, the number diverted exceeds the amount available to be diverted. Since both of these roads are described as being very sensitive to small changes in traffic, this seems to be an important inconsistency.

Several other elements of the analysis appear to be flawed:

a) Beach Drive, from Joyce Road to Broad Branch Road, is expected to have 970 vehicles per hour at the midday peak. This is larger than the projected AM rush hour peak of 800 cars shown in Table G.2.

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b) Beach Drive, from Bladgen Avenue to Rock Creek Parkway is projected to have 3000 vehicles per hour at the midday peak. This is larger than projections of both the AM and PM rush hour peaks shown in Table G.2.

c) In all cases, the analysis projects 8.3% of Average Daily Traffic for the midday peak; 5% would be more typical, according to PARC's transportation consultants at ICF Consulting. Use of 8.3% leads to projected volumes during midday periods that are above the AM rush hour peak and close to or above the PM rush hour peak in all cases along Beach Drive. (ICF's critique of the GMP's traffic analysis was provided to Patrick Gregerson of NPS by e-mail on May 23, 2003.)

d) The projected midday peak in traffic on Beach Drive occurs between 10:00 AM and 11:00 AM, according to the draft GMP (page 263). This assumption is in striking contrast to the actual traffic counts reported by Robert Peccia and Associates in their traffic study for the Park Service. In discussing hourly traffic variation, the Peccia study concluded that traffic counts between 10:00 AM and 11:00 AM were lower than those for any hour between 7:00 AM and 8:00 PM (Peccia, page 4-6).

PARC believes that some of the public opposition to Alternative D may be attributed to overstated traffic impacts in the draft GMP. We urge the Park Service to carefully examine its traffic analysis and revise its conclusions where appropriate. (rocr2925.022 and rocr2925.023)

**Response:** The June 2004 traffic study conducted by the National Park Service was designed to address these specific issues. The results were incorporated into the final environmental impact statement.

**Representative Comment 4:** Inadequate Traffic Studies and Failed NEPA Analysis: Numerous findings demonstrate that [the NPS] has failed to meet these obligations required by NEPA.

1. While an estimated approximately seven cars per minute use upper Beach Drive during the workday, the Park has failed to model cut through traffic impacts on residential neighborhood roads. The draft EIS dismisses the potential for massive cut-through traffic in neighborhoods, but there are no data to substantiate this assertion.
2. The draft EIS fails to evaluate weekday traffic volumes for Alternative D, the Park's 'preferred alternative.'" (Page 337)
3. The EIS uses traffic data collected in 1990 to assess traffic impacts, but this model is faulty as it is designed to evaluate regional traffic issues rather than impacts on corridors or neighborhoods. While the NPS attempted to make adjustments to improve its modeling, expert testimony presented at the May 22 hearing refuted the model's validity.
4. Neighborhoods already experience significant cut-through traffic on weekends when Beach Drive is closed. Despite this actuality, the EIS makes the erroneous assumption that workday traffic will instead choose major corridors such as Connecticut Avenue and 16th Street. These corridors, already overburdened with traffic, will be poor alternatives for those seeking an efficient route downtown.
5. According to AAA, rush hour is not limited to hours before 9:30 a.m. and after 3:30 p.m. Projections indicate that future rush hours will extend well into the 9:30-3:30 hours.

6. The NPS has not performed a detailed analysis of the extent to which closing Beach Drive during these workday hours would enhance recreational opportunities and actual use of the park. (rocr2998.002)

**Response:**

1. Analysis of impacts on neighborhood roads is addressed above under Issue 3. The final environmental impact statement was revised to include more extensive analyses based on the most current data available.
2. Weekday traffic volumes for Alternative D were evaluated on pages 262 through 266. Because the effects of Alternative D would be identical to those of Alternative B during peak hours and identical to those of Alternative C during the 6-hour closure period, there was no need to add Alternative D to the Appendix G tables, which started on page 337. In the final environmental impact statement, the Appendix G tables were revised to include the results for Alternative D.
3. The traffic data were evaluated in 2002 to confirm their continued applicability. The details of this analysis were provided in pages 341 through 348 of the draft environmental impact statement. The model has been appropriate since it was first applied to this study in 1996 and National Park Service has not made any adjustments.
4. These corridors have surplus capacity during the mid-day workday hours when Beach Drive closures would occur under Alternative D. They would provide excellent alternatives for those seeking an efficient route downtown. As demonstrated in the June 2004 traffic study, some of these routes are more time-efficient than routes that involve Beach Drive, even during rush-hour periods.
5. The hours of closure for Beach Drive segments were selected to generally correspond with the lane reversals on the Rock Creek and Potomac Parkway. They were not intended to correspond to the American Automobile Association's (AAA's) identification of rush hour.

As described on page 95 of the draft general management plan, one possible closure configuration for Alternative D was evaluated in the environmental impact statement. The draft document makes clear that the locations and timing of closure may be adjusted to improve the effectiveness of this alternative in meeting the goals that were listed on page 95.

6. A discussion of recreational opportunities and actual use of the park were addressed as Issues 9 and 10 under the heading "Traditional Park Character and Visitor Experience."

**Representative Comment 5:** The first deficiency is the plan lacks analysis of traffic impact on neighborhood roads. A proposition that the rerouted traffic does not impact neighborhood roads is without basis. The plan states that the NPS did not study neighborhood roads, page 346. (rocr3040.004)

**Response:** As stated on page 346 of the draft environmental impact statement, "it was not practical to attempt to model local roadways which carry very low traffic volumes. In order to model

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these low volume roadways, zones sizes would have to be greatly reduced and many more roadways would have to be included.”

The final environmental impact statement was revised include analyses of impacts on neighborhood roads. However, modeling was not performed.

### **Issue 5: The Model Used for Traffic Analyses Was Not Appropriate**

**Representative Comment 1:** The EIS contains no real independent traffic studies. It simply relied on an adapted version of the model employed by the Council of Governments. The COG model is not suited to assess traffic impacts at the local and neighborhood level required by the preferred alternative. Furthermore, the COG model uses outdated traffic counts from the early 1990's. I urge you to give careful consideration to expert testimony presented by traffic engineers on this subject. If left uncorrected, it appears the egregious failure to conduct thorough independent traffic studies presents a significant legal exposure for the Park Service. (rocr0822.003)

**Representative Comment 2 :** The EIS uses traffic data collected in 1990 to assess traffic impacts, but this model is faulty as it is designed to evaluate regional traffic issues rather than impacts on corridors or neighborhoods. While the NPS attempted to make adjustments to improve its modeling, expert testimony presented at the May 22 hearing refuted the model's validity. (rocr2998.002)

**Representative Comment 3:** It's clearly stated in Appendix H (p. 346) that “it was not practical to model local roadways.” NPS attempted to apply the MWCOG regional traffic model to local conditions. For the engineering firm of Robert Peccia & Associates to state that the MWCOG traffic model was “valid for the analyzing the GMP alternatives” suggests either ignorance or gross negligence to the point of malpractice. (rocr2945.006 and rocr0309.008)

**Response:** No changes were made in the modeling because of these types of concerns. The Metropolitan Washington Council of Governments is the agency in the Washington, D.C. area that is responsible for regional planning and traffic modeling. Its transportation model, which was used for the analysis of the Rock Creek Park alternatives, is well suited for assessing traffic impacts at the local and neighborhood level. This model was designed to evaluate impacts on road segments as small as a single block and is routinely used for this purpose by the Metropolitan Washington Council of Governments and others. The effects on more than 80 road segments in and around Rock Creek Park were modeled to determine effects on neighborhoods and corridors. The results were included in Appendix G of the draft environmental impact statement.

The multiple traffic analyses that were performed in association with preparing this general management plan each used the most recently available traffic data at that time. As described in Appendix H, the traffic analysis originally was performed in 1996 using data from 1990. It was run again in 2002 using the then-most-current traffic counts from the Washington D.C. Department of Public Works, which dated from 1999. These were the results that were used in the draft environmental impact statement.

The National Park Service conducted another round of traffic counts in June 2004. It also obtained the most recent traffic counts available from the District of Columbia, Department of

Transportation (2001) and the Maryland-National Capital Park and Planning Commission (2003). The analyses in the final environmental impact statement were based on these data.

Oral presentations at the public hearings were limited to 3 minutes per speaker, which would have been insufficient to describe this highly technical model, much less present expert testimony regarding its validity. The concerns identified by PARC's transportation consultants at ICF Consulting were included under the heading "Issue 4: Traffic Analyses Were Inadequate, Incomplete, or Contained Errors" and were addressed by the June 2004 traffic study.

### **Issue 6: Effects on Major Roadways Were Insufficiently Considered**

**Representative Comment 1:** Any new vehicular restrictions on Rock Creek Park's roadways would divert substantial traffic to other existing major north-south routes in the city, such as 16th Street, 14th Street, Connecticut Avenue, Massachusetts Avenue, and Wisconsin Avenue. Such restrictions would add even more congestion to already severely overburdened major thoroughfares and our adjacent residential streets. The District and its citizens already suffer from the adverse transportation, economic, and environmental impacts of other federally-imposed vehicular traffic restrictions. We don't need to add another. (rocr0374.004)

**Response:** These corridors have surplus capacity during the mid-day workday hours when Beach Drive closures would occur under Alternative D. They would provide excellent alternatives for those seeking an efficient route downtown. As demonstrated in the June 2004 traffic study, some of these routes are more time-efficient than routes that involve Beach Drive, even during rush-hour periods.

Even under the permanent closure associated with Alternative C, effects would be measurable but would not change levels of service. The peak-hour traffic on Beach Drive is about 700 vehicles. Peak hour counts on some of the roads mentioned in this comment are 16th Street – 2,800, Connecticut Avenue – 3,400, Massachusetts Avenue – 2,800, and Wisconsin Avenue – 2,600. If all traffic diverted from Beach Drive took only these four roads, it would increase their traffic loads by 5 percent, with modeled numbers ranging from about 2 percent to 8 percent (see Table G.2 in the final environmental impact statement). As shown in Table G.3, levels of service between Alternative B and Alternative C would be the same on all of these roads during both rush hours except for Wisconsin Avenue south of Calvert, which would have a one-step decline in level of service during the morning period.

**Representative Comment 2:** Since the City is in the midst of a two year long construction project on 16th Street, closing the park during the day will create additional gridlock and pressures on local streets. (rocr1754.002)

**Response:** The referenced project has been completed. However, the document was modified to include ongoing road improvements to the connected, cumulative, and similar actions that were evaluated for each alternative.

**Issue 7: Effects on Alternative Transit Modes Were Insufficiently Considered**

**Representative Comment 1:** We are a car-oriented society, and the only way to get people to consider using public transportation, car-pooling or commuting by bicycle is to make traveling in a single occupancy vehicle an inconvenience. It has worked well in other places. (rocr0523.004)

**Representative Comment 2:** As traffic congestion continues to increase in the Washington area, policies are needed to encourage non-motorized travel. Weekday recreation zones on Beach Drive would encourage alternative transportation modes such as bicycling. (rocr0551.011)

**Representative Comment 3:** Restricting access [on Beach Drive] to bicycles and other non-motorized traffic would help to relieve automobile traffic issues elsewhere by allowing bicyclists a safe place to ride. (rocr0661.002)

**Representative Comment 4:** By closing these sections, Alternative D will create an unbroken paved path from Memorial Bridge to the Maryland line, linking the Park to an expanding regional network of paved trails that local authorities and the Park Service have spent tens of millions of dollars developing. Currently, these trails run from Mount Vernon to Lake Needwood, via the Park, except for the missing sections; from Georgetown to Rosemary Hills via Bethesda; and from Key Bridge to Purcellville, VA. Planned trails will connect the existing network to Silver Spring, Takoma Park, Brookland and Capitol Hill, as well as the Anacostia waterfront. Closure of Beach Drive also connects the two ends of the Capital Crescent/Georgetown Branch Trail, forming a 21-mile loop that is virtually car-free, expanding the possibilities for recreational visits to the Park. (rocr2925.005)

**Response:** Comments were noted. While the National Park Service advocates and supports the development of connecting paths for recreational purposes, we recognize that they can provide multiple functions as part of the transportation infrastructure of the city and region.

**Issue 8: Effects with Broad Branch Road Improvement Project Were Insufficiently Considered**

**Representative Comment 1:** Several years ago the city proposed rebuilding Broad Branch Road in its entirety by raising the street level 7', placing Jersey barriers along the side, raising the speed limit, and removing approximately 120 mature trees. The City's proposal was shelved after opposition from FHCA, local citizens and ANC3F. We can almost be certain that this project, which would negatively impact a 2 mile stretch of road immediately next to Rock Creek Park (the Park starts at the east edge of Broad Branch Road), will be revived to relieve newly caused congestion. Yet the GMP makes no mention of this problem in its evaluation. The failure to consider the impact of traffic on Broad Branch Road is a fatal defect in the GMP. (rocr0372.005)

**Response:** Information on the Broad Branch Road Improvement Project was obtained from the District of Columbia's Department of Transportation. In the final environmental impact statement, this project was included in the section "Connected, Cumulative, and Similar Actions" and included in the cumulative analysis of impacts on local and regional transportation.

**Issue 9: Impact Intensities Are Not Consistent**

**Representative Comment 1:** When you look at page 264, look at Blagden Avenue where there would be 500 vehicles at the maximum non-peak hour increase which is for some reason characterized as a minor increase in traffic. Compare that to when they characterize the traffic increase at Connecticut Avenue, north of Tildon, 500 vehicles is said to be a perceptible increase in traffic.

Not being a traffic engineer but being a student of the English language, I don't understand those two statements. They seem rather contradictory particularly given that both of those areas are very common in the sense of having very heavy traffic. An additional 500 cars is quite a lot of cars. (rocr3056.002)

**Response:** The map on page 203 of the draft general management plan and environmental impact statement is entitled Alternative B Year 2020 Average Weekday Traffic Volumes. As shown on this map, Connecticut Avenue north of Tilden Street in 2020 would carry an estimated 47,500 vehicles per day while the traffic load on Blagden Avenue is estimated at 9,400 vehicles per day. Under Alternative D, as shown on table 29 on page 264, the increase in the *actual* number of automobiles on these two road segments compared to Alternative B would be the same. However, the *relative* change in the number of automobiles would be different. This difference in relative change was noted in the table.

Identification of the relative changes between traffic levels in Alternative B and the action alternatives were added to the final general management plan and environmental impact statement. The traffic changes were reexamined based on the definitions and were modified as necessary to reflect the definitions.

**Issue 10: Cost versus Benefit Analyses for Traffic Management Are Needed**

**Representative Comment 1:** There has been no study of the costs vs. the benefits of closure. (rocr0756.002)

**Response:** As demonstrated in tables 5 and 6 in the general management plan, the costs of the alternatives are a consideration. However, the National Park Service does not prepare typical cost versus benefit evaluations for management actions because they deal more with quality of life issues than absolute costs. The purposes of national parks, including Rock Creek Park, include protection of resources and visitor enjoyment. These factors are not amenable to cost versus benefit analyses.

**Issue 11: Time Period Used in Alternative D to Avoid Rush Hour Is Wrong**

**Representative Comment 1:** The GMP is also flawed in assuming that the morning rush hour ends at 9:30 a.m. Again those of us who live in Forest Hills base this on our first-hand observation and experience over many years. (rocr0372.009)

**Representative Comment 2:** According to AAA, rush hour is not limited to hours before 9:30 a.m. and after 3:30 p.m. Projections indicate that future rush hours will extend well into the 9:30-3:30 hours. (rocr2998.002)

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**Response:** The hours of closure for Beach Drive segments were selected to approximately correspond with the lane reversals on the Rock Creek and Potomac Parkway. They were not intended to precisely define rush hour. However, traffic counts performed in June 2004 demonstrate that traffic on Beach Drive peaks during or before the 8:00 a.m. hour, decreases by 9:00 a.m., and reaches its relatively low mid-day level by 10:00 a.m. In the afternoon, traffic starts to increase about 2:00 and is approaching peak levels by 4:00.

### **Issue 12: Additional Consideration Is Required for High-Occupancy Vehicle Requirements**

**Representative Comment 1:** The effects of two-way traffic and the effects of HOV restrictions on the parkway on the surrounding streets was not clear. How would two way traffic impact the Conn. Ave./Calvert St. area during peak hours. This was not evident in the GMP. Both of these analyses are necessary to make an informed decision. Are the roads around the park operating at capacity during peak times or can they absorb diverted traffic from park roads. The MWCOC predicts a 70% increase in traffic by 2020 regardless of any traffic management actions taken in the park. (rocr2981.009)

**Response:** High-occupancy vehicle requirements were eliminated from Alternative A in the final general management plan, so that impacts related to this alternative are no longer relevant.

The modeling results for Alternative C that are provided in Appendix G include the effects of high-occupancy vehicle requirements. They show that south of Cathedral, average daily traffic levels on Connecticut Avenue in 2020 would be about 6 percent higher than those that would occur with Alternative B, no action alternative. During rush hour, they would be about 8 percent higher. However, this would not result in a change in rush-hour levels of service: they would be rated at "D" during the morning and evening periods for Alternatives B and C.

**Representative Comment 2:** Alternative A: HOV restrictions will force many cars onto city streets. Based on my observations for 25 years as a commuter, 16th and Georgia will be more crowded than your study indicates. (rocr0484.002)

**Response:** Comment noted.

### **Issue 13: Use Current Data and Reassess Effects for Woodley Park**

**Representative Comment 1:** The WPCA believes also that any assessments of the effect of the Draft Plan's Alternatives on traffic in Woodley Park included in existing Environmental Impact Statements are out of date and inaccurate.

The WPCA therefore requests that the final Environmental Impact Statement include an assessment of the effects of Alternatives on traffic efficiencies and intersection grades for the following Woodley Park intersections: Connecticut Avenue and Calvert Street; Connecticut Avenue and Woodley Road; Connecticut Avenue and Cathedral Avenue; Calvert Street and 24th Street; and Calvert Street and 29th Street. (rocr2858.002)

**Response:** Traffic effects were modeled for roadway segments, not for intersections. The tables in Appendix G provide data for Connecticut Avenue from the District of Columbia/Maryland line to Dupont Circle and includes all of the intersections identified in the comment. Average daily

traffic counts were updated using the most recently available values (2001) from the District of Columbia, Department of Transportation. As described in Appendix H, the modeled values for 2020 are still valid and were not recalculated.

#### **Issue 14: Traffic Effects Could Be Devastating on Neighborhoods**

**Representative Comment 1:** The proposed plan would divert traffic from Beach Drive through our neighborhood streets onto Brookville Road, Connecticut Avenue, and the narrow residential streets which run between Rollingwood and the VMA, Estimates run as high as 3,000 to 4,000 diverted vehicles per day, which would be devastating to the safety and tranquility of small residential area such as Martin's Additions. (rocr1803.001)

**Response:** The June 2004 traffic study by the National Park Service determined that traffic on Beach Drive segments between Broad Branch Road and the Maryland line ranged between 5,400 and 7,600 vehicles per day. During the Alternative D mid-day closure period, fewer than 1,700 vehicles, or about 5 vehicles per minute, would be diverted onto multiple routes on both sides of the park. Effects such as those anticipated in this comment would not occur.

#### **Issue 15: Traffic Concerns of Area Residents Are Unfounded**

**Representative Comment 1:** Adjacent residents complain about an increase in local traffic. This complaint is specious and more indicative of their own advantage in the status quo, than long term disadvantage due to a closure. In fact, the natural consequence of closure of Beach Drive would probably be less collateral side-street traffic because fewer commuters would be using Beach Drive in the first place. Furthermore, it will not take long for commuters to realize Beach Drive has been closed and to find alternate routes. The complaints of nearby residents are simply because they themselves will face longer commute times if forced to use 16th St., East West Highway, Connecticut Ave, and other routes to get to and from work, which will impact their property values and quality of life. (rocr1393.003)

**Response:** Comment noted.

#### **Issue 16: Effects on Entry to the Park Were Insufficiently Characterized**

**Representative Comment 1:** If the NPS opted to close Beach Drive during the week (9:30 am - 3:30 pm, Monday - Friday), all Rock Creek Park users north of Military Road would be required to drive (up to 50 city blocks) to access open areas of Rock Creek Park through the remaining entrance ways at Military Road in the District of Columbia. (rocr0384.002)

**Response:** Unlike the weekend closures, Bingham Drive and Sherrill Drive would not be closed on weekdays under Alternatives C or D. Therefore, drivers north of Military Road could access the park from several entrances. There also would not be any impediments to travel across the park between the east and west sides of the city.

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### **Issue 17: Consider Public Transit**

**Representative Comment 1:** I would take issue with the statement that there are excellent public transportation opportunities in the area near Beach Drive. They won't be that helpful in reaching the recreational spots, like picnic Groves 3 and 4 or groves 7 through 10. (rocr2769.024)

**Response:** The environmental impact statement is focused on differences among alternatives rather than problems perceived with all alternatives. There would not be any differences among the alternatives in visitors' ability to reach park facilities from public transportation stops.

### **Issue 18: Transit Alternatives and Regional Transit Planning Are Needed**

**Representative Comment 1:** Due to the ever-increasing number of vehicles on the roads, in the near future the surrounding roads will become just as congested as they might become were the parks roads closed now. Either way, at some point the D.C. government is going to have to take steps to address this inevitable problem, and there is simply no reason for the Park Service to sacrifice the park simply in order to delay this day of reckoning. (rocr2751.003)

**Representative Comment 2:** The logic of the arguments against any closing of Beach Drive suggests that we should turn the whole length of Beach Drive into a four-lane highway. However, Rock Creek Park and Beach Drive were not set aside more than one hundred years ago in order to ease traffic congestion on the streets of the District today. The only long-term solution to traffic congestion is to find alternatives to our society's heavy reliance on the automobile. (rocr2755.002)

**Representative Comment 3:** Perhaps consideration of any change in the usage of the roads in Rock Creek Park should wait until better coordination of traffic plans between the District government and the Park Service can take place. Use of traffic calming devices, one way directional signs, or other means to limit the impact of the Park's closure on the surrounding neighborhoods might make the proposals in your General Plan less objectionable. However, as the proposals now stand, I am opposed, and would support any efforts of my neighbors and our elected representatives to halt them. (rocr2759.001)

**Representative Comment 4:** Montgomery County is encouraging commuters and other drivers to travel in off-peak hours when roads are less congested. Closing Beach Drive at 9:30 am would discourage those who can travel during this later hour. (rocr2975.004)

**Representative Comment 5:** Until we effectively address our region's traffic congestion problem, I simply cannot support measures that run the risk of making matters worse. (U.S. Representative Chris Van Hollen, rocr2994.004)

**Response:** Comments were noted. The National Park Service regularly works with district, state, local, and federal transportation agencies throughout the area to address regional traffic problems.

### **Issue 19: Previous Short-Term Closures Can Indicate Long-Term Impacts**

**Representative Comment 1:** During the periods when the Park has been blocked during the week (i.e. bridge repair) the other routes into D.C. have been seriously impacted. (rocr1461.002)

**Representative Comment 2:** Several years ago, when work on the zoo tunnel closed a long stretch of the park, it was glorious. And guess what? The drivers found other ways to get where they wanted to go. (rocr1460.002)

**Response:** Comments were noted.

#### **Issue 20: Previous Permanent Closures of Other Roads Can Indicate Long-Term Impacts**

**Representative Comment 1:** The supposed traffic burden is really imaginary. When they closed Pennsylvania Avenue in front of the White House, there was all of this political uproar for a short while. Basically there hasn't been any significant difference, and the problem seemed to have gone away. (rocr3073.002)

**Response:** Comment noted.

#### **Issue 21: Weekends Demonstrate What Weekday Effects Will Be**

**Representative Comment 1:** A trial period is unnecessary given that the differences in weekend and weekday cut-through traffic have already been measured by Montgomery County. It doesn't take a traffic engineer to interpret the results. Traffic volumes increase by nearly 50% on neighborhood streets when the NPS closes Beach Drive at the DC line.

Hence, it's intuitively obvious why the NPS can state with confidence that the relative change in traffic volumes would be negligible on arterials such as Wisconsin, Connecticut, and Georgia Avenues, and 16th Street; because the unmodeled neighborhood streets would bear the majority of the burden for carrying the diverted traffic. (rocr2945.007 and rocr0309.010)

**Response:** Comment noted. The traffic counts referenced here were obtained from the Maryland-National Capital Park and Planning Commission and incorporated into the analysis in the final environmental impact statement.

#### **Issue 22: More Study Is Needed before Traffic Management Is Implemented**

**Representative Comment 1:** More study. A number of recommendations in the GMP need further study before they can be recommended for implementation. These suggestions deserve further evaluation:

- Parkway closings. Develop and test some of the park road closing strategies described in Alternative D to more fully measure their impacts on visitation, interpretation, natural and cultural resource management and wildlife habitat.
- HOV-2. Study in greater depth the potential of HOV-2 strategies to reduce commuting volumes without impacting the scenic and historic character of the parkway.
- Traffic calming devices. Investigate the use of traffic calming devices that Alternative A proposes in a manner that will preserve the historic nature of the park roadways. Test these devices in selected locations to identify the most appropriate and effective ones.

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- East-west congestion. Conduct a study of possible measures for mitigating east/west traffic congestion. (rocr3030.007)

**Response:** Traffic management concepts were considered in developing the current range of alternatives, which is an appropriate level of analysis for a general management plan. Traffic planning and engineering studies would be prepared before any of the actions identified in the general management plan were implemented.

### **Issue 23: Can Park Funding Legally Support Local Transportation Needs?**

**Representative Comment 1:** I always thought that it was illegal for one Federal agency to enrich another Federal agency through transfer of assets without the expressed consent of Congress. For example, the Department of Health and Human Services, without Congressional authorization, may not divert its appropriated funds to the National Park Service to build a nature center. The same principle may apply to the diversion of resources from Federal agencies to state and local governments. I believe it is unethical for the National Park Service to knowingly permit the diversion its resources to meet local transportation needs at the expense of park users. What I do not know is whether or not continuing to allow the unintended diversion of a park road to meet local transportations needs is illegal. The NPS has established that Beach Drive has become a local commuter route at the expense of park users. Before the National Park Service chooses an option that would continue to allow park roads to be used primarily for local commuters, the NPS should request a competent legal advisory opinion. (rocr0370.003)

**Response:** Comment noted. NPS management actions for Beach Drive and other park and parkway resources have been and will continue to be in compliance with all laws, regulations, and NPS policies. See the “Servicewide Mandates and Policies” section on page 15 of the draft general management plan and environmental impact statement.

### **Issue 24: Public Comment Is Needed for Traffic Calming Measures**

**Representative Comment 1:** Before any traffic dampening measures can be taken, there must be an opportunity for public comment on such measures. (rocr3140.003)

**Representative Comment 2:** Unlike the other alternative issues which have been spelled out in some detail the traffic dampening is something that is unclear. When I asked Adrienne Coleman about it, up front she indicated that the specifics of traffic dampening would be something that would happen.

If they are going to do traffic dampening, certainly they should study it. Then they should have the process open just as this process is open. There should be a proposal and an opportunity for comment by the people just as we’re having these comments. (rocr3056.003)

**Response:** The superintendent has the authority to implement many traffic calming measures, such as setting speed limits or installing speed tables or grooved centerlines. The superintendent would obtain input and professional designs from traffic planners and engineers prior to implementing any of these measures. The National Park Service also would coordinate with local departments of transportation, including their traffic safety engineers.

For traffic calming actions that would involve construction, the National Park Service would evaluate the need to prepare a compliance document under the National Environmental Policy Act. This decision is based on a standardized, legally defensible checklist and analysis process. If the need for an environmental assessment or environmental impact statement was indicated, opportunities would be provided for agency and public review and comment.

## **COMMUNITY CHARACTER, INCLUDING ENVIRONMENTAL JUSTICE**

### **Issue 1: Environmental Justice**

Several of the comments received regarding community character used such terms as “elitist and class based, and it is wrong” to describe one or more of the alternatives. However, others gave a substantive explanation of why they thought proposed management approaches could have environmental justice implications. All comments in the latter category are presented below.

**Comment 1:** I would like to propose Alternative E - Rock Creek Park for everyone! How about a shuttle bus on weekends to carry people from Columbia Heights and Cleveland Park metros down to the beginning of the closed section of Beach Drive?

While minorities do use the park for special occasions, large picnics etc. one almost never sees them otherwise. I know that many people in my neighborhood do not even know the park exists. I would love to see more park orientation events to familiarize all DC residents with the wonders so available here.

I know there are ranger walks and programs in the park already, but many people over here do not read the Washington Post, where they are listed, don't know how to get to the park or have no transportation, and wouldn't feel comfortable anyway. I've never seen any programs offered in Spanish.

Instead of putting money into a visitor center in the Peirce Mill Barn - how about a nature center bus to travel around the city making people familiar with the park, handing out maps, encouraging them to visit and showing them how to get there? (rocr0935.007)

**Comment 2:** In order to address people's legitimate concerns about access, I feel that public transportation should be added to the park. At present there are no buses that conveniently serve the heart of the Park (the H2 and H4 come close, but let people off in very pedestrian hostile areas). And there is no transportation whatsoever to the part of the Park that will be closed. This seems a major and regrettable oversight that lends credibility to the notion that the Park is only for the wealthy neighborhoods that border it. (rocr1817.002)

**Comment 3:** With implementation of Alternative C or Alternative D, the park would in effect be limited to individuals who live near the park and who are physically able to walk/bike into the park. Since property values are higher along the park than in neighborhoods especially east of the park, this action would be very discriminating to city residents who need to leave their cramped apartments and crowded neighborhoods for a quick drive to the park for some relief of the heat and density of the city. How will a mother of three living on Capitol Hill, or an elderly couple living east of Adams Morgan access the park during non-rush hours if they cannot drive there to then relax and enjoy the sounds and sights of the park? (rocr2757.002)

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**Comment 4:** By limited access to a select group of bikers and walkers who live near the park is very discriminating since property values along the park are much higher. (rocr0803.002)

**Comment 5:** IMPACT ON ADJACENT COMMUNITIES. Much has been stated during the public comment period about impacts from changes in the status quo for adjacent neighborhoods as it relates to motorized traffic. Less publicized has been the effect of balancing motorized and nonmotorized visitor access for neighborhoods in which there is relatively low automobile ownership, as is the case in the District of Columbia neighborhoods of Adams Morgan and Mount Pleasant which are adjacent to the eastern border of the Park. In these densely populated neighborhoods, the 2000 Census documented that about 50% of the households did not have access to a car. Unless some provision is made for nonmotorized visitation to Rock Creek Park Monday through Friday, these Park neighbors will be unable to access the heart of the Park Monday through Friday. The need for access to the Park for persons without automobiles was documented in the 1918 Rock Creek Park Study conducted by the Olmsteds. This need remains unmet today. (rocr0837.006)

**Response:** The response to environmental justice comments 1 through 5 is “Comments were noted.” However, the writers should be assured that their comments will be considered further in the development of plans that will tier from this general management plan, including the park interpretive plan and trail plan. The National Park Service will continue to include environmental justice in its consideration of management approaches for the park to ensure not only that disadvantaged groups do not experience disproportionate adverse affects, but that NPS policies and actions promote including these groups in the benefits of the park.

**Comment 6:** ACCESS. The Park urgently needs to restore, enhance, or construct non-motorized trails into the Park from the communities along its entire eastern boundary. The lack of sufficient safe, welcoming, and maintained non-motorized access at numerous key sites along the east side of the Park is a major environmental injustice that severely under-mines the park's value and significance in the lives of tens of thousands of people living in the city's most diverse neighborhoods. (rocr0315.001)

**Response:** The east side of the park is very steep and it is difficult to find areas of moderate slopes to provide pedestrian and bicycle access without producing adverse effects on park resources. The National Park Service has already identified the installation of a new trail along Piney Branch Road as a goal to be completed under this general management plan. As it develops more specific plans that will tier from the general management plan, the National Park Service will consider other opportunities to improve access to the park from the east.

**Comment 7:** There's a problem which I haven't seen addressed which is that the zoological garden has put a fence on the east side of Rock Creek blocking access of the residents of Mount Pleasant and Adams Morgan to Rock Creek.

I don't believe that the zoological garden actually extends to the east bank of Rock Creek. I believe it's on the west bank. That fence should be removed. The fence should be fencing the parking lot and not preventing access of the adjacent residents to the park. (rocr3064.005)

**Response:** The lands in question are not under the jurisdiction of or managed by the National Park Service. However, we will pass this suggestion to the Smithsonian Institute, which manages the zoo.

### **Issue 2: Adverse Effects on Community Character**

**Representative Comment 1:** The second objection is the ability of our community to carry out its daily living activities. Beach Drive is considered a neighborhood road to our community. At all hours of the day we travel to work, go grocery shopping, and do errands using Beach Drive. The ability to perform these tasks in our neighborhood will be unfairly inhibited by alternatives A, C and D. (rocr0608.004)

**Representative Comment 2:** Closing Beach Drive would send more traffic onto Oregon Avenue, making the asphalt path near Oregon no longer a quiet place to walk, jog, or bicycle. (rocr2776.001)

**Response:** Comments were noted.

### **Issue 3: Beneficial Effects on Community Character**

**Representative Comment 1:** Beach Drive is one of the greatest recreational resources in the District, used by thousands of people on weekends. Expanding this opportunity to weekdays would enhance quality of life for people all over the Washington area. (rocr0551.003)

**Representative Comment 2:** Extending the traffic free time in the RCP will only have a positive impact on the community and help to make this the centerpiece of our area as Central Park is to NYC. (rocr0553.001)

**Response:** Comments were noted.

### **Effects on Property Values**

**Representative Comment 1:** Property values in the neighborhoods would go down as a result of restricted access to the Park. (rocr2788.003)

**Representative Comment 2:** I'm not a lawyer, but I'm going to ask mine if this does not constitute a taking if my property values fall because of the change in the traffic patterns. (rocr3051.003)

**Response:** Comments were noted.

## **PUBLIC HEALTH AND SAFETY**

Public health and safety was not an impact topic in the draft general management plan and environmental impact statement. However, the National Park Service received almost 250 comments regarding public health and safety.

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Because of the large number of comments received on public health and safety, it was added to the final general management plan and environmental impact statement. Organizationally, it was added as a new impact topic in both the “Affected Environment” and “Environmental Consequences” sections. Three major areas were included under this impact topic:

- Effects on safety along roadways (which was included in the draft environmental impact statement under regional and local transportation);
- Effects on personal safety; and
- Effects on emergency evacuations.

Many of the previous sections in this comments and responses report presented safety-related comments. Those sections are identified below. None of these comment types will be repeated in this identification of health and safety concerns. Instead, this section will focus on health and safety issues that were not identified previously.

- Inappropriate focus of decision points.
- The need to coordinate safety with other agencies in “Connected, Cumulative, or Similar Actions.”
- The safety benefits of completing a bicycle trail throughout the length of the park.
- The hazards represented by the poor current condition of the existing bike and foot trails, the poor current condition of the shoulder paving of Beach Drive, and the sewer grates in park roadways.
- The unsafe practices of some motorists and cyclists.
- The lack of sufficient safe, welcoming, and maintained non-motorized access at numerous key sites along the east side of the park.
- Health concerns about air and water pollution.
- The safety of children in nearby neighborhoods if park closures result in increased traffic in neighborhoods.

### **Issue 1: Safety of Recreational Users when Traffic Resumes**

**Representative Comment 1:** When the gates would be opened at 3:30 for rush hour traffic to start streaming through, God save the mother with a child in a stroller who's still on one of those stretches of road without a sidewalk or trail. (rocr0309.006)

**Representative Comment 2:** How will the Park Police deal with a wheelchair in the middle of the closed stretch at 3:15 p.m.? Will Beach Drive be left closed until the person clears? What will the rules be if you want to enter for a walk at 3:00 at Broad Branch and return to your car? When you reach Military Road at 3:30 will Beach Drive be kept closed until your return? Will Park Rangers be posted to ask “how long will you be here?” (rocr0372.007)

**Representative Comment 3:** Of primary concern is the safety of visitors as segments of Beach Drive are reopened to motorists each weekday mid-afternoon. The Draft GMP/EIS is not specific as to how this process will be accomplished to safeguard the well-being of visitors. It is stated, however, on page 261 that “Possible mitigation could include having park staff travel each segment before it reopened and warn nonmotorized recreationists using Beach Drive that the road was about to become a commuter highway. However, this approach would require a commitment of time and would limit the availability of park staff for other activities.” Visitor safety is of paramount importance. A firm commitment on the part of NPS to ensure notifying visitors of reopened roads should be stated as well as an action plan to carry out this task. This plan should clearly specify when park officials will begin notification (suggest a half an hour, fifteen minutes and five minute warnings), how this message will be broadcast (use of a standardized message that is magnified), the number of park officials assigned to this task, a specified number of signs posted along Beach Drive at varying intervals, etc. Is there research that supports this alternative of road(s) closure/reopening? If so, what steps have been implemented to ensure visitor safety during reopening? What is the success rate? EPA would like to see a plan of action and a commitment by NPS to ensure visitor safety. (U.S. Environmental Protection Agency, rocr2982.003)

**Response:** The National Park Service has a long history of safely opening and closing the park roads in association with the current weekend closures, and in changing direction on the Rock Creek and Potomac Parkway every workday morning and evening. The National Park Service agrees that safety is paramount, and commits to working with the U.S. Park Police to develop and implement an effective plan to ensure the safety of visitors.

The National Park Service would prepare an implementation plan that would include the types of measures for ensuring that vulnerable populations dependent on the hard surface were not stranded along the road upon its reopening. This could include performing a sweep of the road ahead of the first car after opening the gate.

## **Issue 2: Traffic Safety in the Park**

**Representative Comment 1:** How many accidents have there been on Beach Drive on weekdays between 9:30 am and 3:30 pm? How is visitor safety enhanced when there are virtually no accidents now? (rocr2792.002)

**Response:** Current traffic accident data (2001-2003) for Rock Creek Park and the Rock Creek and Potomac Parkway were obtained from the U.S. Park Police. These data include time of day and day of the week when each accident occurred. The data are summarized in the “Affected Environment” section of the final environmental impact statement and served as the basis for a revised impact analysis in the “Environmental Consequences” section.

**Representative Comment 2:** Facing a pack of 100 or more riders racing at a high speed (in excess of the posted speed limit) around a blind hairpin turn while you are having a pleasant walk is a far more dangerous and frightening experience than seeing a single car moving at the speed limit. (rocr0372.008)

**Response:** The National Park Service acknowledges that separation of pedestrians and bicyclists is a safety concern. Bicyclists must ride in a safe manner and conform with posted speed limits

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regardless of whether they are traveling on a roadway or sidewalk. Speed enforcement for bicyclists poses the same challenges as enforcing speed limits on automobiles.

The traffic calming measures that are included in the action alternatives should be equally effective for motorists and bicyclists. These devices could be installed on Beach Drive even under Alternative C if speeding bicyclists continued to be a problem. All of the action alternatives also would include two new staff positions for traffic enforcement. These officers would help ensure compliance of both bicyclists and motorists with speed limits and other traffic regulations.

### **Issue 3: Safe Access to Playgrounds**

**Representative Comment 1:** I am very troubled by the fact that it is UNSAFE for children to gain access to these facilities. In order to reach the playground it is necessary to walk through the parking lot in front of the tennis center, and then cross the street. That is bad enough as it is. However, things currently are far worse and far more dangerous. This is because the parking lot area has been closed to foot traffic due to the upcoming tennis matches. This means that parents or nannies bringing their children in strollers to this playground have to walk on the street to reach the playground.

I have seen cars speed along this access road in front of the playground, and I am amazed that Park Service has not previously rectified this problem. I am equally amazed that the Park Service allows the tennis matches to close off foot traffic to the parking area. Shouldn't the safety of our children be among our highest priorities? (rocr0809.002)

**Response:** The action alternatives would include two additional full-time staff positions for traffic enforcement. The playground area may be an appropriate location for reduced speed limits and traffic calming measures to maintain traffic at the speed limit even when officers are not around.

### **Issue 4: Effects on Traffic Accidents in Neighborhoods**

**Representative Comment 1:** The Draft GMP/EIS fails to provide adequate analysis of direct and indirect traffic impacts and related, foreseeable safety issues in the neighborhoods. It also fails to provide any mitigation plans for impacts on neighborhoods. (U.S. Representative Chris Van Hollen, rocr2994.009 and rocr2994.011)

**Representative Comment 2:** I believe that this is a very serious safety issue for the residents of this community. (U.S. Senator Barbara A. Mikulski, rocr2974.002)

**Representative Comment 3:** No analysis of potential accident, injury and fatality rates resulting from diverting traffic onto neighborhood streets. (rocr0755.007)

**Response:** The final environmental impact statement was revised to consider traffic accidents in the surrounding neighborhoods that would occur as a result of Beach Drive closures. This analysis was included for Alternatives C and D under the heading "Cumulative Impacts."

As described previously with regard to traffic, the National Park Service would work with communities to monitor neighborhoods of concern and coordinate with local groups to ensure that a

long-term increase in traffic accidents on residential streets near the park did not occur. If problems were documented, the National Park Service would coordinate with the community to develop effective solutions. These could include such measures as installing sidewalks in areas where they do not exist, providing better signage to route drives back to arterials and help them avoid entering the neighborhoods when Beach Drive is closed, and improving compliance with speed limits.

#### **Issue 5: Absence of Sidewalks in Neighboring Communities**

**Representative Comment 1:** None of our neighborhood streets have sidewalks. A significant traffic increase will further threaten pedestrian safety in our neighborhood. (rocr2999.003)

**Representative Comment 2:** Adding to this safety concern is the additional traffic and parking that will result from the forthcoming expansion of the Brookville Supermarket, and the fact that the portion of Brookville Road in the Village of Chevy Chase below Bradley Lane lacks any sidewalk whatsoever, a situation that boggles the mind in its stupidity. (rocr2795.003)

**Representative Comment 3:** Public Safety - According to traffic counts conducted by the Montgomery County Maryland and District of Columbia civil engineering teams, a closure of Beach Drive would divert approximately 200 vehicles per hour (between 9:30 am and 3:30 pm, Monday through Friday) into the neighborhoods surrounding Rock Creek Park. A primary route will be Daniel Road (Rollingwood), Oregon Avenue (DC) and Broad Branch Ave. (DC). The stated traffic counts on the noted residential streets would be unduly burdensome to children, families and elderly people who are not now provided sidewalks on the majority of those streets. NPS could have learned these things, but has failed to conduct a neighborhood impact study or cooperate with the stakeholder jurisdictions (Montgomery County and DC) to study and address this public safety threat. (rocr2838.002)

**Response:** Statements like these indicate that residents of surrounding communities currently are concerned about safety associated with the absence of sidewalks, regardless of the management of Rock Creek Park. As part of its policy of being a good neighbor, the National Park Service would lend its support to the efforts of these communities to convince their cities that sidewalks should be installed to enhance the safety of neighborhood residents and other pedestrians.

#### **Issue 6: Safety of Park Visitors, Especially Women**

**Safer with Traffic Representative Comment 1:** I also think there is a safety and security issue; limiting access during the week will make the park a more lonely spot, more likely to lead to potential dangers. As an avid walker myself, I would feel uncomfortable using the park roads and pathways during the week if broad access is cut off. During the weekend, there are so many people bicycling and walking on those roads that there is "safety in numbers" and no one would feel threatened. The numbers of bicyclists and walkers would be considerably smaller during the week. (rocr0354.004)

**Safer with Traffic Representative Comment 2:** I understand one of the considerations was pedestrian safety. If anything this new plan removes any hope of safety in the park. As a woman, I would never consider running/walking in Rock Creek parkway when there is no motor traffic. If

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someone was to approach me in Rock Creek, the first thing I would do is run out into the street and try and flag down a motorist to help me. A male colleague here at work who regularly runs in Rock Creek park during the week, says the same thing - he would try and flag down a vehicle for assistance. By completely removing the traffic, the chances of receiving any assistance is virtually eliminated. Therefore this plan would bar me from ever using Rock Creek whether by foot or by car. (rocr0842.001)

**Safer with Traffic Representative Comment 3:** I also wonder how my security will be increased if I must leave the security of my vehicle and enter the park alone. (rocr0908.002)

**Safer with Traffic Representative Comment 4:** You will actually deter some people from using the park. I have acquaintances who are already afraid to walk alone there during the day. This would become a very frightening place for some people, particularly older women. (rocr0934.002)

**Safer with Traffic Representative Comment 5:** Park safety is increased by promoting access. The “traffic” of all types has a benefit of limiting the opportunity for illegal activity. If you keep the law abiding good citizens of the nation out— others will find ways in for less wholesome purposes. As it is, most of us now walk carrying our cell phones, and I have used mine twice on walks to report illegal activity. (rocr2884.004)

**Safer without Traffic Representative Comment 1:** As a woman, I feel safer walking on the street as opposed to the trails. I hope that the street will remain closed to traffic during the day (at least). (rocr2748.000)

**Safer without Traffic Representative Comment 2:** Upper Beach Drive during the mid-day, mid-week closures would give me a big, wide open, safe place to run and walk with my fellow cyclists, baby joggers and others. On the weekends, it’s a really comfortable place to run. (rocr3047.003)

**Safer without Traffic Representative Comment 3:** This is a quote from a woman who was attacked in Rock Creek Park in the year 2001. She talks about the moment when she was attacked. She said “As soon as I felt him trying to get his arms around my neck, it was as if an internal switch flipped. I realized two things at once. First, that the loud traffic from Beach Drive across the creek was drowning out my screams.” I tell you what, if I’m running on one of those trails in Rock Creek Park and I yelled for help, there’s a lot better chance somebody is going to come and help me if there are people on foot and people on bikes on that road at that moment rather than just this steady stream of traffic. (rocr3047.004)

**Response:** The final general management plan and environmental impact statement was revised to include current information on crimes against persons (murder, rape, and assault) in the park vicinity and to evaluate the potential effects of the alternative on crimes against persons.

### **Issue 7: Evacuation in the Event of an Emergency**

**High Concern Representative Comment 1:** The Draft GMP/EIS [is inadequate because it] utterly fails to analyze emergency evacuation from D.C. or from the neighborhoods. (U.S. Representative Chris Van Hollen, rocr2994.008)

**High Concern Representative Comment 2:** The proposal, by prohibiting automobile access to the park, creates a public safety hazard in that it blocks access to emergency first responders and law enforcement agencies in addition to depriving residents of access to emergency evacuation routes at Rock Creek Parkway and George Washington Parkway. (rocr2855.004)

**High Concern Representative Comment 3:** The plan also pays no heed to the post-9/11 evacuation scenarios in the Washington area. Rock Creek is not a major evacuation route such as Connecticut Avenue or Wisconsin Avenue but it is the only reason my daughter and I reached home the morning of September 11th. Will USPP officers be available to unlock barrier gates in the event of an emergency to provide additional egress? (rocr1477.004)

**High Concern Representative Comment 4:** We are also deeply concerned in the post-9/11 environment about a plan to shut off a major alternative route. This will have enormously damaging consequences should residents of our neighborhood who work downtown be forced to leave the city as a result of a terrorist act or threat. (rocr2871.003)

**Low Concern Representative Comment 1:** I don't believe Beach Drive is on the list of official evacuation routes. There may be a reason why that's so. Perhaps it's because an accident along Beach Drive could cause a complete and catastrophic blockage of the road. In contrast, accidents along Connecticut and Wisconsin Avenues and 16th Street can be bypassed fairly easily. Even if Beach Drive would be used for mass evacuations, there is no reason why the road closures of Alternative D would present a special or insurmountable problem. The DC region is full of roads that change direction depending on time of day (15th Street NW, 17th Street NW, Rock Creek Parkway) or are closed to traffic with physical barriers at certain times of the day (HOV lanes on Interstate 395) and so on. These special arrangements have not been eliminated in the interest of homeland security, and I assume it's because they don't present a major impediment to the safety of DC residents who might one day need to evacuate downtown. (rocr2923.011)

**Low Concern Representative Comment 2:** Response to the argument that barriers along Beach Drive will interfere with fire and rescue: NPS can evaluate its long experience with the current metal gate system during weekend closures. My observations are these: Police, ambulance and fire equipment currently have complete access along Beach Drive during weekend closure hours. The metal gates can be circumnavigated, though this sometimes required a quick detour onto grass or a concrete median. I see emergency vehicles (especially Park Police) in these areas frequently. Various simple changes in closure devices (such as breakaway gates or gates with emergency release devices), different gate placement or transition to simple "No Entry" signs might allow better or more convenient access for emergency vehicles. Although these options would not provide barriers as secure as locked metal gates, NPS does use such modest traffic barriers elsewhere in Rock Creek Park. (rocr2923.010)

**Response:** The ability to currently use Beach Drive for emergency response and the effects of each alternative on this ability and on the evacuation of the city during a major emergency were added to the final general management plan and environmental impact statement.

## **Issue 8: Health Benefits Resulting from Exercise**

**Representative Comment 1:** Exercise! Many of us get enough of it, but from what I read, a lack of enough exercise is a major problem for a substantial percentage of Americans. Opening up

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Beach Drive for six hours a day on weekdays to non-automobile pursuits such as walking and bicycling couldn't help but promote more exercise which many Americans need. (rocr2895.001)

**Representative Comment 2:** Children are being deprived of an opportunity for exercise in their daily life by this unrelenting heavy traffic, which bears no small share of the responsibility for skyrocketing obesity and associated health problems among children. Asthma among children has also increased (and my 8-year old son is among these statistics), with increased air pollution from vehicles a major contributor. During the summer, when unhealthy air quality is virtually a constant, we are told to stay inside. Car-free zones on Beach Drive would provide a place where my son can ride his bicycle outdoors where he will not be subjected to health and safety hazards. (rocr1785.003)

**Representative Comment 3:** These HHS figures were compelling enough for President Bush to demonstrate the leadership to launch his Healthier US Initiative. Your draft plan for Rock Creek National Park is totally consistent with the Executive Order the President issued to implement his initiative. For there is a growing consensus that communities designed primarily for automobile use deny families safe places for walking, bicycling and other forms of daily physical activity that are essential to a healthy lifestyle. Your draft plan directly addresses this need by providing a safe and healthy place for our family to bicycle. I commend you for your support of the President's initiative. (rocr0565.003)

**Response:** Comments were noted. Exercise relates directly to the numbers of visitors and the types of activities they are participating in, which were considered in the section "Traditional Park Character and Visitor Experience." Exercise was not evaluated separately as a health issue in the general management plan and environmental impact statement.

## CONSULTATION AND COORDINATION, REFERENCES, AND APPENDICES

### CONSULTATION AND COORDINATION

Comments for this section should be considered along with the comments for the “Connected, Cumulative, and Similar Actions” section because the comments addressed similar topics.

#### **Issue 1: The National Park Service Did not Coordinate Sufficiently with Others, or Did not Acknowledge the Positions of Local Officials and Their Constituents**

**Representative Comment 1:** There is little discussion of neighborhood views in the decision making process after 1998. The report should include the views of the ANCs from Forest Hills, Tenleytown, North Cleveland Park, Colonial Village, Shepherd Park, and Crestwood, all of whom oppose further Beach Drive closures. It is noteworthy that those ANCs closest to the park, whose constituents in theory would benefit the most from Beach Drive closure because of its geographic proximity are those ANCs opposed to further Beach Drive closure. In addition, the views of Council members Fenty and Patterson, whose wards include Rock Creek Park, also should be included. (rocr2935.008)

**Representative Comment 2:** Remarkably, the NPS somehow neglected to include the vast majority of those who use, or are affected by the use, of the park. Washington DC has very specifically defined and highly organized elected neighborhood commissions; in Maryland, the National Capital Park and Planning Commission is a governmental body; even the vast list of interested parties to whom the NPS distributed the draft. All of these should have been invited to the table to help craft an inclusive plan. Rather, the plan being presented pits the park's constituents against each other. (rocr0309.002)

**Representative Comment 3:** All of the local and regional governments remain opposed to any closing of Rock Creek Parkway. This opposition is not acknowledged nor are current conditions – not future fears – dealt with. (rocr1477.003)

**Representative Comment 4:** Issue: NPS has not involved other impacted government entities in its planning.

- The District of Columbia and Montgomery County Councils have passed formal resolutions emphasizing the importance of Beach drive and the Rock Creek and Potomac Parkway to the local and regional transportation system.

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- The Councils and the Maryland Department of Transportation, the District of Columbia Department of Public Works have urged NPS that the corridors have no new motor vehicle restrictions because of the potential adverse effects on the heavily burdened regional street grid. This position is supported by all of the above.
- Several neighborhood organizations, and many individuals commented during scoping that they oppose the alternatives for similar reasons. (NPS p. 62) (rocr2999.009)

**Representative Comment 5:** On page 62 of the draft plan the National Park Service recognized that it has to work with the D.C., Maryland and local governments and agencies to address issues relating to air and water quality. It is of grave concern that the National Park Service has failed to work with these governments and agencies when developing its traffic proposals. (rocr0764.011)

**Representative Comment 6:** Strong Political Opposition. Some critics have stated that you failed to adequately involve stakeholders affected by Beach Drive closure. Others state that you failed in your analysis of the proposed action. In my opinion, I unfortunately believe you have done both. Our elected officials are very sensitive to community concerns, and almost universally they agree with our findings concerning the inadequacies of your EIS. (rocr0822.007)

**Representative Comment 7:** The Superintendent never contacted our homeowner's organization or other homeowner's associations to discuss the impact to our public safety. (rocr1710.001)

**Response:** Please see the “Consultation and Coordination” section on pages 269 and 270 of the draft environmental impact statement. In addition to the outreach activities described there, the draft general management plan and environmental impact statement were part of the consultation process. Before and after the publication of the draft plan:

- The National Park Service sent out newsletters to keep the public and their representatives informed. Several of the newsletters invited public input, and responses resulted in the preliminary alternatives and subsequent changes to create the final alternatives. Please see “Public Input and the Development of Alternatives” starting on page 59 of the draft plan.
- The park superintendent and planners talked with numerous citizens organizations, resource management agencies, and governing bodies and considered their concerns and suggestions during preparation of the plan.
- People and their representatives were encouraged to consult via phone or in person, or to make their views known in letters and e-mails.
- The National Park Service advertised the availability of the general management plan and environmental impact statement in the *Washington Post*, *Washington Times*, and other local newspapers, and solicited citizen input.
- The National Park Service invited citizens, organizations, and representatives to public meetings where they could learn more about the plan and provide comments.

Because of these efforts, more than 800 people participated in public meetings and the National Park Service received more than 3,000 written and oral responses on the draft document.

The process of consultation and coordination for the general management plan will remain open until the record of decision is signed. After that, it will continue in the implementation of the approved plan.

## **Issue 2: Better Access to Information on the Internet**

**Representative Comment 1:** The notice in the *Federal Register* at Volume 68, Number 50, Page 12368 states that "the document will be posted on the National Park Service Planning site under: <http://www.nps.gov.rocr/>." When I initially went to that site in May 2003 to obtain the draft plan, that page clearly identified the draft plan and by clicking on the name of the plan would bring up the plan. Since May the D.C. County Council and many other constituents have come out against the draft plan. At the same time the National Park Service has changed its site. The draft plan is no longer at the site listed in the Federal Register. Instead you have to hit "in DEPTH" and then search for the draft plan. On the other website, <http://planning.nps.gov/plans.cfm> you have to search for Rock Creek Park Draft Management Plan on a long menu of management plans. I can only assume that the National Park Service made these changes because it did not like the general negative reaction it was receiving from the significant number of groups that would be negatively impacted by the road closure proposals described in the draft plan. (rocr0764.000)

**Response:** The National Park Service regrets any inconvenience that may have occurred in finding the draft general management plan on the Internet. However, there was no intent to "hide" the document because of the potential for a negative response. The condition noted here was the result of an NPS servicewide web site revision, at least two of which have been implemented since the draft general management plan was released. It was coincidental that one occurred during the comment period.

Individual parks have no control over such NPS-wide reorganizations. Parks often are not aware of such changes until after they are implemented. As we identify resulting problems, we must then work with web specialists to reestablish the links that were inadvertently buried or severed.

All web links will be updated in the final general management plan and its *Federal Register* announcement. However, the Internet is a dynamic tool and the situation you described may happen again. If it does, we would appreciate you notifying the park superintendent's office by telephone and making us aware of the problem so we can implement appropriate corrective actions.

## **APPENDICES**

### **Issue 1: Traffic Modeling Methodology or Results Were Inadequate**

**Representative Comment 1:** The EIS contains no real independent traffic studies. It simply relied on an adapted version of the model employed by the Council of Governments. The COG model is not suited to assess traffic impacts at the local and neighborhood level required by the preferred alternative. Furthermore, the COG model uses outdated traffic counts from the early 1990's. I urge you to give careful consideration to expert testimony presented by traffic engineers on this subject. If left uncorrected, it appears the egregious failure to conduct thorough independent traffic studies presents a significant legal exposure for the Park Service. (rocr0822.003)

**Representative Comment 2:** The NPS has made no effort when preparing the draft plan to determine the traffic impacts that closing Beach Drive would have on the surrounding communities. It's clearly stated in Appendix H (p. 346) that "it was not practical to model local roadways." NPS attempted to apply the MWCOG regional traffic model to local conditions. The proposed northern-most point of closure to Beach Drive is over one mile south of its intersection with East-West Highway. By simply placing traffic counters in the southbound lane of Beach Drive/Jones Bridge and at the entrance to the four neighborhood streets that precede the proposed closure to measure the differences between weekend and weekday traffic volumes, your traffic engineers could have extrapolated the impact of the cut-through traffic. At the very least, the extrapolation would have illustrated the need to sub-divide the traffic analysis zones to better capture the likely trip distribution. For the engineering firm of Robert Peccia & Associates to state that the MWCOG traffic model was "valid for the analyzing the GMP alternatives" suggests either ignorance or gross negligence to the point of malpractice. (rocr2945.006 and rocr0309.008)

**Representative Comment 3:** The GMP states that "nearby street intersections would be operating well below their capacities during the mid-day period.... While the diverted the mid-day traffic would be perceptible on some city streets, it would not cause any changes in levels of service or in traffic-related community character." At the same time it says that there would be a 20% reduction in traffic along Beach Drive between Joyce Road and Broad Branch Road. That 20% of traffic has to go somewhere. The logical places for it to go are first, along Broad Branch Road, and second through Forest Hills to Connecticut Avenue. Both of these problems have received insufficient consideration under the GMP, which is based on a long-outdated traffic study (1990). The model to which that data is then applied "has [not] been developed and validated . . . [for] corridor studies such as the Rock Creek Park project." (rocr0372.003)

**Representative Comment 4:**

- Insufficient modeling of cut-through traffic in local neighborhoods.
- The plan includes no data on projected impacts to residential roads in Maryland.
- Those of us who live near the park witness a surge in cut-through traffic on weekends when Beach Drive is already closed to vehicles. Approximately 420 vehicles currently enter Beach Drive every hour during the workday. Despite weekend patterns, NPS assumes that most diverted workday traffic will choose congested corridors such as Connecticut Avenue and 16th Street.
- What little modeling is included in the plan relies on old data from 1990, and the model employed is designed for evaluating only regional issues, not corridor or neighborhood impacts. (rocr3000.002)

**Response:** No changes were made in the modeling because of comments. The Metropolitan Washington Council of Governments is the agency in the Washington, D.C. area that is responsible for regional planning and traffic modeling. Its transportation model, which was used for the analysis of the Rock Creek Park alternatives, is well suited for assessing traffic impacts at the local and neighborhood level. This model was designed to evaluate impacts on road segments as small as a single block and is routinely used for this purpose by the Metropolitan Washington

Council of Governments and others. The effects on more than 80 road segments in and around Rock Creek Park were modeled to determine effects on neighborhoods and corridors. The results were included in Appendix G of the draft environmental impact statement.

The multiple traffic analyses that were performed in association with preparing this general management plan each used the most recently available traffic data at that time. As described in Appendix H, the traffic analysis originally was performed in 1996 using data from 1990. It was run again in 2002 using the then-most-current traffic counts from the Washington D.C. Department of Public Works, which dated from 1999. These were the results that were used in the draft environmental impact statement.

The National Park Service conducted another round of traffic counts in June 2004. It also obtained the most recent traffic counts available from the District of Columbia, Department of Transportation (2001) and the Maryland-National Capital Park and Planning Commission (2003). The analyses in the final environmental impact statement were based on these data.

#### **Issue 2: Add to Laws and Executive Orders**

**Comment 1:** In Appendix B, Laws and Executive Orders, Other Laws, Under Natural Resources, include the “District of Columbia Water Pollution Control Act, D.C. Law 5-188; D.C. Official Code §§ 8-103. (rocr1736.011)

**Response:** This change was made in the final document.

#### **OTHER NEPA CONCERNS**

##### **Issue 1: Document Provides Adequate NEPA Compliance**

**Comment 1 from the U.S. Environmental Protection Agency:** In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft General Management Plan/Environmental Impact Statement (Draft GMP/EIS). EPA has assigned this Draft Environmental Impact Statement (DEIS) a rating of LO-1 (Lack of Objections - Adequate which indicates that we have no objections to the proposal and that the DEIS adequately addressed the environmental impacts of the preferred alternative. (rocr2982.001)

**Response:** Comment noted.

##### **Issue 2: Document Provides Inadequate NEPA Compliance**

**Representative Comment 1:** Do you know they violated NEPA by not performing a detailed statement when undertaking a major federal action that significantly impacts the quality of the human environment. The NPS did not perform one impact study on our neighborhood to determine if our public safety would be jeopardized by their plan. We feel this was done deliberately because they knew the results. I had the Maryland National Capital Park and Planning Commis-

CONSULTATION AND COORDINATION  
REFERENCES AND APPENDICES

sion perform the studies on our street and they found a significant cut through problem with the preferred alternative plan of the NPS. (rocr1710.002)

**Response:** The referenced traffic counts from the Maryland-National Capital Park and Planning Commission were not collected until the summer of 2003, after the draft plan and environmental impact statement had been released for public comment. As a result of public concerns, a supplemental traffic study was performed by the National Park Service in June 2004 to address the effects of Beach Drive management approaches on surrounding roads, including those in neighborhoods. The results from the National Park Service traffic study and the Maryland-National Capital Park and Planning Commission traffic counts were used in the final environmental impact statement to determine effects that would occur outside the park.

**Representative Comment 2:** I find that in fact you have failed in your obligations under NEPA to adequately evaluate the impacts in the local communities, particularly the traffic concerns. (rocr3095.002)

**Response:** An expanded analysis of impacts on traffic outside the park has been included in the final environmental impact statement.

**Representative Comment 3:** Relying on outdated studies and statistics, the recommendations lack currency and may have led to faulty projections and, consequently, inappropriate recommendations. (rocr3030.003)

**Response:** Although some of the supporting studies may have been conducted several years ago, their relevance to current conditions were confirmed before using them to evaluate alternatives. Data throughout the document were updated during preparation of the final general management plan and environmental impact statement.

**Representative Comment 4:** I find the draft management plan inadequate because it does not recognize, much less discuss it in any length, the importance of Rock Creek Park to migratory birds. The reference to migrants appears only in a very brief summary of birds in the park. It is extremely surprising, in fact rather dismaying since during the 1999 cell phone controversies, literally inches of testimony were delivered to the National Park Service on the importance of Rock Creek as a migratory corridor through the increasing urbanized D.C. area. (rocr3105.001)

**Response:** the final general management plan and environmental impact statement was modified to emphasize the importance of birds and birding and to include a commitment to protect and enhance habitat for birds. These changes included:

- Adding birding to the list of appropriate activities in 6 of the 12 management prescriptions that comprise the alternatives. These included the Administration/Operations Zone where vegetation management for other purposes inadvertently created high-value bird habitat. See table 2 and the associated text in the final general management plan.
- Modifying all of the action alternatives to include a commitment enhance the management of park habitats for birds, and identifying of some of the actions that could be taken to achieve this goal.

- Providing the locations of some of the park's important bird habitat areas in the "Affected Environment" section and adding a commitment in this section to ensure their conservation and enhancement, regardless of the alternative selected in the final general management plan.

Following approval of the final general management plan, the park's natural resource management plan will be updated to identify specific locations and measures for bird management, including habitat enhancement.

**Representative Comment 5:** Analyses described within this draft dismiss any effects on natural resources as insignificant without giving any references or demonstrating that any research was conducted. If there are no significant impacts, research supporting that needs to be documented. If there is no documentation, then projected effects should be identified as speculative; if they are based on professional judgment, that should be clearly stated and the professionals must be cited. (rocr2980.003)

**Response:** Research conducted to support the general management plan and environmental impact statement is identified in the "Bibliography," which began on page 287 of the draft plan. The list of preparers (authors and other professionals) was provided on pages 271 and 272. Both of these were updated in the final general management plan and environmental impact statement.

**Representative Comment 6:** Presented to serve as both a Management Plan and an Environment Impact Statement, the hybrid document ends up doing neither well. (rocr3030.002)

**Response:** The draft general management plan and environmental impact statement conform with all of the format and content requirements of *Director's Order #2, Park Planning* (NPS 1998a), its implementing sourcebook (NPS 1999b), and *Director's Order #12 and Handbook: Conservation Planning, Environmental Impact Analysis, and Decision Making* (NPS 2001a). The National Environmental Policy Act (NEPA) encourages combining these types of documents, and the National Park Service has been using this approach successfully for more than 20 years.

### **Issue 3: Inappropriate Setting of Priorities**

**Representative Comment 1:** There are many omissions in the Draft Management Plan Alternatives, but the controversy over weekday closing of part of Beach Drive has kept them from public notice. The present Alternatives put little priority on maintaining the natural resources of the Park — animals, birds, plants, water, ecology. (rocr3027.001)

**Response:** Goals and approaches for managing these resources in Rock Creek Park and the Rock Creek and Potomac Parkway are described on pages 15 through 28 of the draft general management plan. Because most aspects of their management would be the same for all alternatives, including the alternative to continue current management (Alternative B), there was no need to examine these aspects further in the environmental impact statement.

**Representative Comment 2:** The GMP is unbalanced in its analysis and corresponding recommendations for management of an urban park and all its resources. Rock Creek Park has much more to offer than a scenic commute by car or bike. The plan gives short shrift to other users and

the other management opportunities and challenges that will shape the future use and health of the park. (rocr3030.001)

**Response:** Comment noted.

**Representative Comment 3:** And, especially critical, given limited federal funding resources, the plan does not provide sufficient guidance on how the National Park Service will set its priorities for protecting and managing the park in the future. (rocr3030.005)

**Response:** The general management plan provides broad-based guidance on management. More detailed implementation, strategic, and annual plans will include the level of information needed for setting priorities for protecting and managing Rock Creek Park.

#### **Issue 4: Inadequate Consideration of Costs**

**Representative Comment 1:** Another deficiency is no cost benefit analysis undertaken by NPS. No cost benefit analysis was performed by the NPS of adverse impacts on neighborhoods surrounding the park which are an increased rate of pollution, increased gas use by diverted vehicles, need for the community to put traffic calming measures. (rocr3040.008)

**Response:** The analyses of air quality and traffic in the draft and final environmental impact statements found that effects on regional air quality and traffic (with associated use of gasoline) would be negligible. Therefore, changes in costs would be negligible. While the incremental change in traffic outside the park because of some management actions on Beach Drive could cause some communities to consider traffic calming measures, no such actions have actually been proposed. Based on these considerations, there was no reasonable basis on which an analysis of costs versus benefits could be prepared.

The National Park Service does not prepare typical cost versus benefit evaluations for management actions because they deal more with quality of life issues than absolute costs. The purposes of national parks, including Rock Creek Park, include protection of resources and visitor enjoyment. These factors are not amenable to cost versus benefit analyses.

**Representative Comment 2:** I suspect that the cost estimates for any changes are too low. Any new construction would have to be in substantial conformity with the latest official design criteria. 23 CFR 652.7(5). These historic roads, which predate the environmental laws, can be preserved to their historic proportions, but if you try to widen them, then you will incur additional cost. Plus, the network is set. It may take an act of Congress to change the roads in Rock Creek Park. (rocr2769.020)

**Response:** Comment noted.

**Representative Comment 3:** Financial issues: Because the report depends on data that is several years old, and project information that is preliminary at best, we believe that the financial projections for both capital and operating expenses are insufficient to meet the needs of the park. We recommend that the final GMP should include:

- a) Sufficient resources. Justification for funding at levels sufficient to provide sufficient staffing and other resources to fully support the planning and management of the park and its programs;
- b) Deferred maintenance. Disclosure of all deferred maintenance requirements (and annual funding for deferred maintenance) over the 20 years of the GMP planning horizon; and
- c) FY2004 \$. Update financial data in the report with fiscal year 2004 dollars (instead of 2001). (rocr3030.013)

**Response:** The general management plan considers life-cycle costs for new facilities, but the costs of maintaining existing facilities typically are not considered in the selection of alternatives. The level of detail that was included in the document supports the general management plan process.

Annual maintenance is not a general management plan issue. A general management plan is intended to address items that are not in the yearly budgets.

Cost estimates in the final environmental impact statement were updated to 2004.

#### **Issue 5: Need for NEPA Analyses on Individual Actions**

**Representative Comment 1 from the U.S. Environmental Protection Agency:** EPA understands that the NPS will prepare project-specific environmental analysis prior to implementation of any of the actions included in the Draft GMP/EIS. EPA makes specific reference to the proposed physical relocation of administrative functions from historic structures to a consolidated central office. It is not determined whether relocation of the park's administrative offices would be moved to commercial space inside or outside of the park. Thus, the impacts associated with this proposal have yet to be analyzed. (rocr2982.002)

**Response:** For projects inside the park, the National Park Service is planning to perform further environmental analyses, probably including a National Environmental Policy Act (NEPA) environmental assessment, before such actions would be implemented. Elements that could occur outside the park (leasing administrative office space and space for the U.S. Park Police) would require commercial-type space, which we expect would be available and would result in negligible impacts.

**Representative Comment 2:** I would seriously question the wisdom of expanding facilities at the Maintenance Yard for administration and at the H-3 area for police. I presume the public will have an opportunity to comment on more specific plans if the Park Service decides in the future to move in that direction. (rocr0317.003)

**Response:** The final environmental impact statement was revised to clarify that the park maintenance yard and H-3 area were just candidate sites. It also made clear that new in-park facilities would be constructed only if suitable commercial space could not be found outside the park and after a siting study that emphasized environmental concerns that determined the best in-park loca-

tions for the facilities. This would include preparation of National Environmental Policy Act documentation with opportunities for agency and public review and comment.

#### **Issue 6: Need Unbiased Decision-Making**

**Representative Comment 1:** I was astounded to read recent newspaper reports quoting Superintendent Adrienne Coleman's defense of her proposed week day closure of Beach Drive as being based on her own personal preferences for use of Rock Creek Park ("It's hikers. It's people like me who walk in the park"). It is black letter law that a federal government administrator must never let her/his personal uses or preferences affect the ways in which she/he manages the Nation's resources. (rocr1481.001)

**Response:** It is unclear how the referenced quote would indicate a preference for any of the alternatives.

Alternative D, which would involve mid-day closures of Beach Drive during the week, was developed based on a request from the Mayor of the District of Columbia. Please see page 95 and appendix D of the draft general management plan and environmental impact statement. A team of approximately 20 NPS representatives from the park, region, and national levels met to develop this alternative based on the Mayor's request.

The general management plan was not based on the preferences of any individual. The alternatives presented in the general management plan were developed through public scoping. Impact analyses were conducted by subject matter experts and other professionals.

**Appendix A**

**Federal, District, State, Regional,  
and Local Agency  
Comment Letters**

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

JUL # 1 2003

Ms. Adrienne Coleman  
Superintendent  
National Park Service  
Rock Creek Park  
3545 Williamsburg Lane NW  
Washington, D.C. 20008-1207

Re: Rock Creek Park and the Rock Creek and Potomac Parkway

Dear Ms. Coleman:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft General Management Plan/Environmental Impact Statement (Draft GMP/EIS). EPA has assigned this Draft Environmental Impact Statement (DEIS) a rating of LO-1 (Lack of Objections/ Adequacy) which indicates that we have no objections to the proposal and that the DEIS adequately addressed the environmental impacts of the preferred alternative. A copy of EPA's ranking system is enclosed for your information. However, EPA has the following comments which we would like to see addressed in the Final Environmental Impact Statement (FEIS).

The dual purpose of the Draft GMP/EIS is to specify resource conditions and visitor experiences to be achieved in Rock Creek Park and the Rock Creek and Potomac Parkway and to provide the basic foundation for decision-making regarding the management of the park and parkway. The sensitive issue that this dual purpose provides is to protect the scenic, natural, and cultural resources of the park and parkway and to provide for appropriate public use of these resources. The NPS proposes Alternative D as the preferred alternative as a means to create a balance between these conflicting purposes. Alternative D (Mid-weekday Recreation Enhancement) would involve closing selected park road segments to motorized vehicles on weekdays between the morning and evening rush hours. In addition, the goals of this alternative would include preserving traditional visitor experiences and activities; enhancing natural, cultural, and scenic values in the park; asserting more control over nonrecreational use of park roads and improving visitor safety; and optimizing the use of structures for purposes such as interpretation, visitor contact, and park administration.

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GMP/EIS

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The balance of protecting park resources and appropriate use of the park by the public is the goal of Alternative D. However, implementation of specific improvements must be thoroughly explained, compliance with NEPA requirements must be met, and (where applicable) proper application for necessary permits and approvals should be acquired to allow for a complete analysis of environmental impacts. Thus, EPA understands that the NPS will prepare project-specific environmental analysis prior to implementation of any of the actions included in the Draft GMP/EIS. EPA makes specific reference to the proposed physical relocation of administrative functions from historic structures to a consolidated central office. It is not determined whether relocation of the park's administrative offices would be moved to commercial space inside or outside of the park. Thus, the impacts associated with this proposal have yet to be analyzed. In addition, the Final GMP/EIS should address the concerns below as they relate to Alternative D.

Of primary concern is the safety of visitors as segments of Beach Drive are reopened to motorists each weekday mid-afternoon. The Draft GMP/EIS is not specific as to how this process will be accomplished to safeguard the well-being of visitors. It is stated, however, on page 261 that "Possible mitigation could include having park staff travel each segment before it reopened and warn nonmotorized recreationists using Beach Drive that the road was about to become a commuter highway. However, this approach would require a commitment of time and would limit the availability of park staff for other activities." Visitor safety is of paramount importance. A firm commitment on the part of NPS to ensure notifying visitors of reopened roads should be stated as well as an action plan to carry out this task. This plan should clearly specify when park officials will begin notification (suggest a half an hour, fifteen minutes and five minute warnings), how this message will be broadcast (use of a standardized message that is magnified), the number of park officials assigned to this task, a specified number of signs posted along Beach Drive at varying intervals, etc. Is there research that supports this alternative of road(s) closure/reopening? If so, what steps have been implemented to ensure visitor safety during reopening? What is the success rate? EPA would like to see a plan of action and a commitment by NPS to ensure visitor safety.

As stated within the Draft GMP/EIS (page 99), Alternative D proposes to improve the protection of the park's natural resources. In particular, poorly designed sections of foot and horse trails would be rerouted and abandoned trail sections would be restored to natural conditions. Those sections of the existing recreational trail slated for realignment should be clearly depicted on a map in the Final GMP/EIS to ensure the protection of natural resources. Protection of the federally endangered Hays spring amphipod warrants attention as well as ensuring that historic resources will not be adversely affected. (Impacts to these resources were the reason that construction of a paved recreation trail as well as converting the streamside segment of the Blackhorse Trail and construction of a parallel horse trail to replace the Blackhorse Trail were eliminated from further analysis.) Therefore, rerouting of horse trails should be outlined in the Final GMP/EIS to ensure the protection of valued resources.

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Page 125 states that "Under NPS floodplain management guidelines, historic structures, picnic facilities, daytime parking facilities, roads, and trails are acceptable within the 100-year floodplain." EPA suggests explaining why these facilities are acceptable within the 100-year floodplain so as to warrant attention/rehabilitation to impacted sites. For instance, it is specifically stated that "Rehabilitation of the Peirce Mill complex would occur within the 100-year floodplain. This historic structure is allowed within the 100-year floodplain under NPS Floodplain Management Guidelines (NPS 1993a)." It is also stated that improving and possibly rerouting of the recreation trails along Rock Creek, portions of which are in the 100-year floodplain, is planned. Trail construction in a floodplain is acceptable under NPS Floodplain Management Guidelines (NPS 1993a)."

Thank you for the opportunity to review and comment on this project. If you need additional assistance, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,



William Arguto  
NEAP/Federal Facilities Team Leader

Enclosure

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#### SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION\*

##### Environmental Impact of the Action

###### **LO—Lack of Objections**

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

###### **EC—Environmental Concerns**

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

###### **EO—Environmental Objections**

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

###### **EU—Environmentally Unsatisfactory**

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

##### Adequacy of the Impact Statement

###### **Category 1—Adequate**

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

###### **Category 2—Insufficient Information**

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

###### **Category 3—Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

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ELEANOR HOLMES NORTON  
DISTRICT OF COLUMBIA  
**COMMITTEE ON  
TRANSPORTATION AND  
INFRASTRUCTURE**  
SUBCOMMITTEES  
AVIATION  
ECONOMIC DEVELOPMENT,  
PUBLIC BUILDINGS, AND  
EMERGENCY MANAGEMENT



**Congress of the United States  
House of Representatives  
Washington, D.C. 20515**

**COMMITTEE ON  
GOVERNMENT REFORM**  
SUBCOMMITTEES  
RANKING MINORITY MEMBER,  
DISTRICT OF COLUMBIA  
CIVIL SERVICE AND  
AGENCY ORGANIZATION

July 15, 2003

Ms. Adrienne Coleman  
Superintendent  
National Park Service, Rock Creek Park  
3545 Williamsburg Lane, NW  
Washington, D.C. 20008-1207

**VIA FACSIMILE & MAIL**

Dear Superintendent Coleman,

I am writing regarding the pending proposal known as Alternative D to close portions of Beach Drive in Rock Creek Park during the weekday hours of 9:30 am-3:30 pm. I applaud the National Park Service (NPS) for its effort to develop the General Management Plan for the park for which we have been waiting for several years. However, I write to express my concern about Alternative D in the absence of information that significant numbers of residents would benefit and considering environmental and safety concerns about the displacement of vehicles to the streets of a highly residential neighborhood. Instead, I would like to offer my office to help achieve an alternative that might be more acceptable to all.

A decision to reroute automobile traffic onto highly residential streets and neighborhoods normally would be understood to have negative environmental and safety consequences. However, where vehicles otherwise must travel along a beautiful recreational park area, such an assumption can be overcome. The weekend closure of Beach Drive has successfully brought great recreational pleasure and benefits for adults and children who are drawn from the surrounding neighborhoods and from across the city for the precise reason that the weekend is when children are not in school and when most adults and parents do not work. However, the hours proposed in Alternative D are the exact hours when most adults are at work and most children are at school. Although this is an era when most families have working parents and most children are in some form of day care or schooling, the Park Service has conducted no survey or offered any information regarding how many people might use the park during the proposed closure, and who they might be. Even the most avid runners, walkers, bicyclists and nature lovers work or attend school. Disproportionately those most likely to use the park during non-working hours might be the elderly and the disabled. We do not have information that

considerable numbers of retired adults or others would use the park. Thus, it is possible that the rerouting of cars into neighborhoods would cause new environmental damage to these neighborhoods without benefiting significant numbers of residents.

I also am concerned about the absence of information concerning the effect of rerouting automobile traffic from Beach Drive onto surrounding residential streets from 9:30am-3:30pm. The NPS conducted a four day weekday study of traffic patterns on Beach Drive from 9:00am-4:00pm. The Park Service may regard the number of vehicles- one to three cars per minute- as an insufficient traffic burden on residential streets when the neighborhood is viewed as a unit. What is not known is whether some streets might get the brunt of this traffic. It seems likely that drivers would discover the routes most convenient to themselves and if so, that certain residential streets might receive disproportionate concentrations of automobile traffic. More information would be needed regarding the impact that closing Beach Drive would have on the neighborhood streets that border the park, which routes cars would likely take, and other effects on the city's major arteries (Connecticut Avenue, 16<sup>th</sup> Street) in order to ensure that some streets do not become proxies for Beach Drive.

Although the NPS apparently dismisses the idea of creating a recreational trail beside or near Beach Drive as too expensive and difficult, I believe that my experience in getting federal funds for recreation trails in the District of Columbia proves otherwise. As a senior member of the Transportation Committee I was able to secure \$8 million in 1998 in Transportation Equity Act funds for the Metropolitan Branch Trail, a multi-use commuting and recreation trail that runs adjacent to the Metro Red Line from Union Station to Silver Spring. I have requested an additional \$10 million for the trail in this year's reauthorization of the Transportation Equity Act. Working with other regional members of Congress and the Park Service, I believe that adequate funding could be achieved that would allow for the construction of an environmentally friendly adjacent recreation trail that conforms to the historical integrity of the park and Beach Drive.

It is important in seeking to preserve Rock Creek Park for the benefit of users that NPS is careful to avoid negative, unintended consequences. I believe the proposal I offer is the better alternative. I ask that this alternative replace Alternative D and that you arrange a meeting with me to discuss how to achieve it.

Sincerely,

Eleanor Holmes Norton

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Page 2 of 3

CHRIS VAN HOLLEN  
8TH DISTRICT, MARYLAND  
  
COMMITTEE ON  
EDUCATION AND THE WORKFORCE  
  
COMMITTEE ON GOVERNMENT REFORM

**Congress of the United States**  
**House of Representatives**  
Washington, DC 20515

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www.house.gov/vanhollen  
chris.vanhollen@mail.house.gov

June 23, 2003

Ms. Adrienne Coleman  
Superintendent  
Rock Creek Park  
3545 Williamsburg Lane, NW  
Washington, D.C. 20008-1207

Dear Superintendent Coleman:

First of all, I want to thank you for taking the time to meet with me and my staff to discuss the proposed options outlined in the National Park Service's Draft Management Plan for Rock Creek Park. I sincerely appreciate your interest in making considered choices about park management and your commitment to public participation in the final shape of any future plan.

While there are clearly many worthy, non-controversial recommendations in the Draft Management Plan, the issue generating the most discussion among my constituents is the plan's "preferred option," also known as Alternative D, which calls for closing northern portions of Beach Drive to motorized traffic on weekdays from 9:30 AM to 3:30 PM.

As an avid hiker, I have been a strong advocate for expanding opportunities for outdoor recreation and can certainly appreciate the motivation behind this proposal. However, I also have a responsibility to consider the wider impact such a proposal would have on the entire community I represent – including seniors, persons with disabilities, parents with small children, residential communities surrounding the park, and motorists experiencing some of the worst traffic congestion in the nation.

In that regard, after careful deliberation, I am writing to ask that the National Park Service not pursue any future management plan that involves additional road closures in Rock Creek Park at this time.

In my judgment, the park's current policy of closing portions of Beach Drive to automobile traffic on weekends has proven highly popular among recreationists and strikes a sensible balance between competing uses for this most valuable resource. However, further restricting the permissible uses of Beach Drive during the week strikes me as unfair to those citizens wishing to enjoy the park whose mobility requires a car. The new proposal would eliminate use of Beach Drive during the one segment of time when individuals with disabilities, and others who require a car for mobility, can enjoy the park without having to compete with rush-hour traffic.

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JUN 25 2003  
U.S. HOUSE OF REPRESENTATIVES

Adrienne Coleman  
June 23, 2003  
Page 2

Additionally, I am concerned about the impact new road closures would have on the residential communities surrounding the park. While I am aware that the Draft Management Plan includes a traffic model analysis, I also note the analysis' stated limitation with respect to local roadways (see Appendix H, p. 346). In light of that limitation, I must give substantial weight to the real world experience of my constituents in the impacted neighborhoods who report significant increases in diverted traffic on their local roads during weekend closures. Finally, until we effectively address our region's traffic congestion problem, I simply cannot support measures that run the risk of making matters worse. I have also attached a summary of other concerns I have with the plan.

I would welcome the opportunity to work with you and others at the National Park Service to seriously pursue the idea of completing a hiker-biker trail through the areas proposed for closure. That option would satisfy the needs of all the users of the park and address the concerns of the adjacent communities. Your analysis dismisses that option and questions whether "user numbers and use patterns would justify the construction of a paved recreation trail" given that weekday usage is "relatively low" and that "most recreation needs are already being met by the weekend road closures in these areas." Those observations also undercut the rationale for your proposal to close the road to motorized traffic during those hours. Further, a 1990 NPS study recommended completion of the Rock Creek bike path, as one of its highest priorities. In addition, this option would clearly serve the needs of recreational and commuting cyclists, without impeding automobile traffic or diverting that traffic onto neighborhood roads. Given those things, NPS should not be deterred from further considering it, just because the option is "difficult" and "expensive." Your analysis fails to consider the benefits to be obtained by allowing all day use of an all day bike trail, so that cyclists could use it during rush hours when it would be in the greatest demand, not just during the mid-day period.

Rock Creek Park is truly a gem in our nation's capital. Please know I share your commitment to protecting that gem, and I stand ready to work with you to find creative ways to expand recreational opportunities in the park. However, I must respectfully request that you eliminate new road closures from further consideration in the park's management plan at this time.

Sincerely,



CHRIS VAN HOLLEN  
Member of Congress

Enclosure

**Legal problems with the Draft Rock Creek Park  
General Management Plan and Environmental Impact Statement**

Violations of the Rock Creek Enabling Acts:

The statutes that created Rock Creek Park established these purposes:

*"to be used for driving [given the date, this probably referred to horse carriages] and for horseback riding...and footways for pedestrians...."*

(Rock Creek Park Authorization, 1890)

*"for connecting Potomac Park with the Zoological Park and Rock Creek Park"*

(Rock Creek and Potomac Parkway Authorization, 1913)

NPS recognizes that driving by car in the Park is a traditional and fundamental park purpose, but its preferred alternative eliminates this use during the day, every day, at times when Park visitors (not through commuters) are most likely to drive through the Park for pleasure or to visit Park areas. The proposed alternative also directly and seriously undercuts the legislated purpose of connecting the north and south parts of the Park with the Zoo.

Violations of the National Environmental Policy Act:

NEPA requires NPS to prepare a "detailed statement" before undertaking any "major federal action" "significantly affecting the quality of the human environment." CEQ regulations require the agency to describe the areas affected by the alternatives under consideration. CEQ regulations also make clear that economic and social effects must be analyzed.

The Environmental Impact Statement must address: (among other things)

\*environmental impact of the proposed action (including direct and indirect effects; possible conflicts between the proposed action and the objectives of federal, regional, state, and local land use plans and policies; and means of mitigating such effects)

\*any adverse environmental effects which cannot be avoided should the proposal be implemented

\*a preferred alternative, a no action alternative, and other alternatives considered

The Draft GMP/EIS:

- Excludes from analysis any impacts north of the Maryland state line
  - Utterly fails to analyze emergency evacuation from D.C. or from the neighborhoods
  - Fails to provide adequate analysis of direct and indirect traffic impacts and related, foreseeable safety issues in the neighborhoods
  - Fails to provide adequate analysis of potential recreational benefits of proposed closure
  - Fails to provide any mitigation plans for impacts on neighborhoods
  - Fails to seriously study the idea of completing a paved recreation trail throughout the areas proposed for closure, one option that would satisfy both residents and bicyclists.
- (See page 34 where NPS discusses and dismisses this alternative because of concerns whether "user numbers and use patterns would justify the construction of a paved recreation trail" given that weekday usage is "relatively low" and that "most recreation needs are already being met by the weekend road closures in these areas" and because completing the bike path would be "difficult and expensive."  
A 1990 NPS study recommended completing the bike trail through Rock Creek Park.)

NPS appears to believe, and has publicly stated, that it can undertake the closure, for a trial one year period, and study the impacts later. That turns NEPA on its head and clearly violates the law.

MR. JONES: My name is George Jones. G-E-O-R-G-E, J-O-N-E-S. I live in the Rolling Wood community adjoining Rock Creek Park.

I would like to submit into the record a letter from our representative of the 8<sup>th</sup> District of Maryland, Chris Van Hollen written to interested members of our neighborhood.

"Thank you for contacting me about proposals to close off portions of Beach Drive to vehicular traffic during certain non peak hours. I appreciate your taking the time to share your concerns with me.

As an avid hiker and biker I know that many families in our area enjoy having open access to Beach Drive on the weekends. But Beach Drive is an important traffic artery for many in our community. Our region already experiences some of the worst traffic congestion in the country and I will not support measures that make matters worse.

I would have to be convinced by thorough traffic studies that closing of Beach Drive at certain times during weekdays would not result in significant cut through traffic in adjacent neighborhoods or contribute to increased traffic, gridlock or inconvenience.

I have always encouraged the development of trails for users by bikers and hikers, such as the Capital Crescent and Georgetown Branch trails. These other scenic pathways that do not cut off essential roads for motors.

Again, I appreciate knowing your views in this matter. Please do not hesitate to let me know whenever I may of service to you. Sincerely, Chris Van Hollen."

I would also like to add my own comments.

I commend the National Park Service for recognizing all the alternative, including alternative B preserve the historical, cultural and natural resources of the park. I note that the National Park Service—it recognizes that it has to work with D.C., state and local governments and agencies to address its use relating to air and water quality. However, I was disturbed that the Park Service failed to work with these other agencies and governments when developing its various traffic proposals.

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Page 1 of 7

I'm disheartened that the National Park Service is disregarding the Councils of D.C. and Montgomery County, the D.C. Department of Public Works and Maryland Department of Transportation who have urged that Beach Drive and Rock Creek and Potomac Parkway remain open with no new restrictions to motor vehicles.

I note that the National Park Service supported alternative D. Their reasons are inconsistent with other alternatives that they rejected out of hand.

For example, they proposed to close—the proposal to close it during the midday and at night. They rejected it because they would eliminate driving for pleasure except during rush hours. What does alternative D do? Eliminate the pleasure of driving during the day.

I request that the Park Service plan—I note that the plan references the Mayor's letter as a basis for proposing alternative D. If the Mayor can't D.C. Council to— If they keep Kringle Road closed, the National Park Service should not do his heavy looking for him. Therefore, I propose that the National Park Service consider as an alternative one which implements all of its proposals other than the closure of Rock Creek Park. Thank you.

**NEAL R. GROSS**

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"Bob Campbel (CIMS)" <BCampbel@chesapeakebay.net  
To: "ROCR Superintendent (E-mail)" <rocr\_superintendent@nps.gov>  
cc: "Jonathan Doherty (CIMS)" JDoherty@chesapeakebay.net,  
"Bob Ford (E-mail)" bob\_ford@nps.gov  
Cynthia\_Cox@nps.gov  
05/13/2003 12:01 PM AST  
Subject: NPS CBPO Consultation Comments on the Draft GMP/EIS

The National Park Service Chesapeake Bay Program Office has completed review of the Rock Creek Park and the Rock Creek and Potomac Parkway Draft General Management Plan /Environmental Impact Statement. Our comments are offered for consideration in context of our ongoing staff to staff consultation with Rock Creek Park rather than as an official position on the proposed alternatives. Understanding that the GMP alternatives hinge on more controversial issues, we note the implied intent under all alternatives to "continue to support the goals of the Chesapeake Bay Program as they relate to Rock Creek and its tributaries and continue to participate in the regional program as a partner." (Page 19)

The attached document (GMPtext) summarizes the Chesapeake Bay Program and the National Park Service's obligations and opportunities relative to the Bay Program. This document is provided for your reference and as "boiler plate language" that might be appropriate for incorporation (whole or in part) in sections of the GMP/EIS.

Our page specific comments are as follows:

Page 19: Consider modifying the 4th bullet point to read, "Promote greater public understanding of water resource issues in the park and encourage public support for and participation in improvements in the Rock Creek, Potomac River and Chesapeake Bay watersheds."

Page 43: In 3rd paragraph, consider incorporating language to provide more clarity on NPS commitments relative to the Chesapeake Bay Program.

Page 299: Correct the Index entry for Chesapeake Bay (also defacto covering Chesapeake Bay Program) by deleting pages 126, 276, 329. Chesapeake Bay Program is currently referenced on pages 19, 21, 43, 124, 272, and 319.

Page 313: APPENDIX B: LAWS AND EXECUTIVE ORDERS: Add reference to the Estuaries and Clean Waters Act of 2000. (Title II-Chesapeake Bay Restoration mandates our compliance with Chesapeake Bay agreements.)

Page 319: Last paragraph, consider incorporating language to provide more clarity on NPS commitments relative to the Chesapeake Bay Program.

**.....Chesapeake Bay Program (Boiler Plate Language for General Management Plans (e.g., for use in the Affected Environment, Purpose and Need for Action, Laws and Executive Orders, and /or Relationship to Other Planning Efforts sections))**

As the largest estuary in the United States and one of the most productive in the world, the Chesapeake Bay was this nation’s first estuary targeted for restoration and protection. The Chesapeake Bay Program is the unique regional partnership among the states of Virginia, Maryland, and Pennsylvania; the District of Columbia; the Chesapeake Bay Commission; and the Environmental Protection Agency (lead agency for the federal government) that has been directing and conducting the restoration effort since the signing of the historic *Chesapeake Bay Agreement of 1983*. Considered a national and international model for estuarine research and restoration programs, the Bay Program is led by the Chesapeake Executive Council. The Executive Council, composed of the chief executives of the signatory partners, meets annually to establish the policy direction for the Bay Program. The restoration goals, as articulated in a series of agreements and plans, have evolved over the years reflecting the dynamic understanding of the challenges in restoring this ecosystem.

Since its inception in 1983, the Bay Program’s highest priority has been the restoration of the Bay’s living resources—its finfish, shellfish, Bay grasses, and other aquatic life and wildlife. The *1987 Chesapeake Bay Agreement*, established a goal to reduce the nutrients nitrogen and phosphorus entering the Bay by 40% by 2000. In the *1992 Chesapeake Bay Agreement*, the Chesapeake Executive Council agreed to continue the 40% reduction goal beyond 2000, as well as to attack nutrients at their source—upstream in the Bay’s tributaries. As a result, Pennsylvania, Maryland, Virginia, and the District of Columbia began developing tributary strategies to achieve nutrient reduction targets. In 1993, the Executive Council set an initial goal for recovery of Bay grasses at 114,000 acres by 2005 and set goals for reopening spawning habitat for migratory fish by removing blockages, such as small dams, on Bay tributary rivers.

In July 1994, high-level federal officials from 25 agencies and departments (including the Department of the Interior and the National Park Service) signed the *Agreement of Federal Agencies on Ecosystem Management in the Chesapeake Bay*. This historic agreement outlined new cooperative efforts as well as specific goals and commitments by federal agencies across lands throughout the watershed.

In 1994, the Executive Council made the implementation of the tributary strategies the top priority for the Bay and its rivers. The Executive Council also adopted the *Chesapeake Bay Basinwide Toxics Reduction and Prevention Strategy*. In addition, the Executive Council issued new initiatives for riparian forest buffers and habitat restoration.

ROCR 0949  
Page 4 of 7

The 1995 *Local Government Partnership Initiative* engaged the watershed's 1,650 local governments in the Bay restoration effort. The Chesapeake Executive Council followed this in 1996 by adopting the *Local Government Participation Action Plan* and the *Priorities for Action for Land, Growth and Stewardship in the Chesapeake Bay Region*, which address land use management, growth and development, stream corridor protection, and infrastructure improvements. In 1996, the Executive Council also signed the *Riparian Forest Buffers Initiative*, which strengthened the Bay Program's commitment to improve water quality and enhance habitat. A new goal called for restoring 2, 010 miles of riparian buffers on stream and shoreline in the watershed by 2010.

In 1997, the Executive Council renewed its commitment to the 40% nutrient reduction goal, acknowledging that it had to accelerate efforts, having concluded that the goal for phosphorus would be met by 2000, but the goal for nitrogen would not be met unless efforts were intensified. Other directives signed in 1997 focused on wetlands protection and restoration and the development of a Community Watershed Initiative.

In November 1998, representatives of 22 federal agencies and departments (again including the Department of the Interior and the National Park Service) signed an updated agreement, the *Federal Agencies' Chesapeake Ecosystem Unified Plan*, which contains 50 specific goals and commitments by federal agencies.

In 1998, education and technology were highlighted as tools for the future of Bay restoration. The Executive Council signed a directive to coordinate a regional effort to manage the use and transportation of animal waste. The Executive Council also directed the Chesapeake Bay Program to begin the process of creating a new Bay Agreement, to be completed in 2000.

On June 28, 2000, the Executive Council signed the new *Chesapeake 2000* agreement, which will guide the next decade of restoration and protection efforts throughout the Bay watershed. The agreement commits to protecting and restoring living resources, vital habitats and water quality of the Bay and its watershed. The agreement has cutting edge commitments in the area of water quality—correcting nutrient and sediment problems in the Bay and its tidal tributaries with the goal of taking them off of the impaired waters list by 2010. *Chesapeake 2000* also addresses sprawl and livability issues—committing to reduce the rate of harmful sprawl development of forest and agricultural land in the Bay watershed by 30% by 2012, and committing to permanently preserve 20% of the Bay watershed by 2010. The most recent commitment, derived from *Chesapeake 2000* and signed in 2001, addresses storm water management to control nutrient, sediment and chemical contaminant runoff from state, federal and District-owned land.

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On November 7, 2000 the President signed the *Estuaries and Clean Waters Act of 2000*, which included Title II – Chesapeake Bay Restoration. This Act amends Section 117 of the Federal Water Pollution Control Act (known as the Clean Water Act) and reauthorized the Chesapeake Bay Program to continue leading the Chesapeake Bay restoration effort. Title II—the “Chesapeake Bay Restoration Act of 2000” includes explicit mandates that Federal agencies that own or operate facilities within the Chesapeake Bay watershed shall: 1) participate in regional and sub watershed planning and restoration programs; and 2) ensure that the property, and actions taken by the agency with respect to the property, comply with the Chesapeake Bay Agreement, the Federal Agencies Chesapeake Ecosystem Unified Plan, and any subsequent agreements and plans.

The National Park Service has an opportunity to play an important role in the effort to build a sustainable future for the Chesapeake Bay and its 64,000-square-mile watershed. A healthy, sustainable Chesapeake Bay watershed is beneficial in the protection of park resources, and will also support quality of life issues and the health of the economy and local resources. In the 1994 National Park Service Vail Agenda report, *Ecosystem Management in the National Parks*, it is stated: “Widespread land development, increasing human population, global demand for natural resources, and changing dynamics of communities and economies place enormous stress on natural and cultural resources....The National Park Service must adapt its management practices to confront these challenges to resource stewardship....An ecosystem approach to management will require actions to be targeted to root causes of problems whether they exist inside or outside park boundaries....We should increasingly work in cooperation with partners to help manage resources of larger areas....”

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In joining the Chesapeake Bay Program in 1994, the National Park Service committed to work together with other Bay Program partners to manage the Chesapeake Bay watershed as a cohesive ecosystem—to contribute to the restoration, conservation, and interpretation of the Bay’s many valuable resources both within and beyond the national parks of its watershed. Our contributions are the product of the shared responsibility and coordinated efforts of the National Capital and Northeast regions and the collective efforts of all the parks and program centers within the Chesapeake Bay watershed. The primary challenge for the National Park Service is to be “standard bearers” in our resources management and to model programs and management practices on parklands that compliment the goals and objectives of the Chesapeake Bay Program. Parks in their normal daily operations are already contributing to the Chesapeake Bay Program commitments through stewardship of park resources, and the *Chesapeake Bay Restoration Act of 2000* explicitly states that we are expected to do so. Furthermore, the participation of parks in the development of state/local tributary strategies for the restoration of water quality in tributaries listed under the Clean Water Act, section 303 (d) is critical.

Beyond the stewardship of park resources, there is also a clear expectation that the National Park Service can and will provide leadership in meeting the commitments of the Chesapeake Bay Program in several key areas—public access, resource interpretation and education. Restoration of the Chesapeake Bay will require participation from all partners including the public who lives and vacations in the Bay watershed. The visitation that we enjoy at our sites represents an enormous opportunity for the National Park Service and the Chesapeake Bay Program. The National Park Service has an important educational opportunity to share with the public the importance of the Bay as a unique natural and cultural resource through its resource management work and its interpretive operations. National parks are ideally suited to showcase exemplary environmental practices that demonstrate the value and fundamental wisdom of maintaining healthy, functioning natural systems. By interpreting not only the important resources we manage in our parks, but also how we manage our resources in relationship to an ecosystem, we can help spread vital resource stewardship messages to the public.

The Chesapeake Bay Program presents a great opportunity—a regionally focused vision for integrating good management into the larger context of the Chesapeake Bay ecosystem. It challenges park managers to act as stewards of their parks in the context of the larger watershed/ecosystem to insure a sustainable future, and so also embrace the challenges of the National Park System Advisory Board, in

its 2001 report: *Rethinking the National Parks for the 21<sup>st</sup> Century*, wherein the Board recommended that the National Park Service:

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Page 7 of 7

- Embrace its mission, as educator, to become a more significant part of America’s educational system by providing formal and informal programs for students and learners of all ages inside and outside park boundaries.
- Encourage the study of the American past, developing programs based on current scholarship, linking specific places to the narrative of our history, and encouraging a public exploration of the American experience.
- Adopt the conservation of biodiversity as a core principle in carrying out its preservation mandate and participate in efforts to protect marine as well as terrestrial resources.
- Advance the principles of sustainability, while first practicing what is preached.

ROCR 2974  
Page 1 of 1

ROCR 2995  
Page 1 of 1

BARBARA A. MIKULSKI  
MARYLAND  
  
COMMITTEES:  
APPROPRIATIONS  
HEALTH, EDUCATION, LABOR,  
AND PENSIONS

United States Senate  
WASHINGTON, DC 20510-2003

May 29, 2003

Ms. Fran P. Mainella  
Director  
National Park Service  
Department of the Interior  
1849 C Street, NW, Room 3112  
Washington, D.C. 20243-0001

Dear Ms. Mainella:

I am forwarding a letter from one of my constituent groups, Rollingwood Citizens Association, who is concerned about the permanent closure of Beach Drive.

These residents already contend with cut-through traffic on the weekends, due to the closure of Beach Drive. If the General Management Plan for Rock Creek is approved, they will be asked to endure a further inconvenience during weekdays.

I believe that this is a very serious safety issue for the residents of this community, and I hope that you will take every appropriate action to address their concerns as soon as possible. Please send your response to my Projects Coordinator, Dr. Gail Street in my Greenbelt office at the above address.

Thank you very much for your consideration. I look forward to hearing from you.

Sincerely,

*Barbara A. Mikulski*  
Barbara A. Mikulski  
United States Senator

BAM:gs

- IN REPLY PLEASE REFER TO OFFICE INDICATED:
- 4629 THAMES STREET, SUITE 400  
BALTIMORE, MD 21231  
(410) 962-4510  
VOICE/TDD: (410) 962-4512
  - 60 WEST STREET, SUITE 202  
ANNAPOLIS, MD 21401-2448  
(410) 263-1805  
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  - 6404 IVY LANE, SUITE 406  
GREENBELT, MD 20770-1407  
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HAGERSTOWN, MD 27140-4804  
(301) 797-2626
  - SUITE 1E, BUILDING B  
1201 PEMBERTON DRIVE  
SALISBURY, MD 21801-2403  
(410) 546-7711

PAUL S. SARBANES  
MARYLAND

United States Senate  
WASHINGTON, DC 20510-2002

June 2, 2003

Ms. Adrienne Coleman  
Superintendent  
Rock Creek Park  
3545 Williamsburg Lane N.W.  
Washington, D.C. 20008

Dear Ms. Coleman:

A number of my constituents who reside in Chevy Chase have contacted my office regarding the National Park Service's preferred alternative (D) to the General Management Plan for Rock Creek Park which would restrict weekday automobile traffic in the northern part of Beach Drive during non-rush hours.

As you will note from the enclosed correspondence, they are particularly concerned that this proposal would divert traffic into communities surrounding the park and create safety hazards. Moreover, they assert that the draft Environmental Impact Statement failed to adequately evaluate weekday traffic volumes for the preferred alternative in these neighborhoods. Indeed, it is my understanding that the draft plan only analyzed weekday traffic volumes for alternatives A, B, and C.

I ask that you give these concerns full and careful consideration and that the Park Service undertake additional traffic studies in these communities so that the full impacts of this proposal can be thoroughly and thoughtfully evaluated. Your attention to this matter is appreciated and I look forward to hearing from you.

With best regards,

Sincerely,  
*Paul Sarbanes*  
Paul Sarbanes  
United States Senator

PSS/eai

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WASHINGTON, DC 20510  
202-224-4524

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Page 1 of 1

ROCR 3083  
Page 1 of 1

MAHYI AND

**United States Senate**  
WASHINGTON, DC 20510-2002  
July 15, 2003

Ms. Adrienne Coleman  
Superintendent  
Rock Creek Park  
3545 Williamsburg Lane N.W.  
Washington, D.C. 20008

Dear Ms. Coleman:

I am writing to follow up on my previous correspondence of June 2 regarding the National Park Service's proposal to close the northern portions of Beach Drive to automobiles during weekday non-rush hour periods.

As you know, I am a strong proponent of bicycling and alternative transportation options and have worked very hard to establish and expand federal programs to help develop bicycle and pedestrian trails throughout this region and the nation. Indeed, I am leading an effort in the Congress to establish a new federal grant program to support the development of alternative transportation services for our national parks, wildlife refuges and other public lands. Known as the Transit in Parks Act or TRIP, the legislation would provide \$90 million a year in capital funds for transit projects, including rail or clean fuel bus projects, pedestrian and bike paths, or park waterway access, within or adjacent to national parks and other public lands. I would be pleased to work with you, the Washington Area Bicyclist Association, and other organizations to explore options for enhancing hiker-biker trails in Rock Creek Park and the greater Washington metropolitan area.

Montgomery County Executive Doug Duncan, the Montgomery County Council, the Council of the District of Columbia, other elected officials as well as a recent editorial in the Washington Post have each raised serious concerns and expressed opposition to the proposed closure of Beach Drive on weekdays. In light of these concerns, I urge you to fully explore alternative solutions to enhancing the visitor experience, resource conditions, traffic controls, and bicycle and pedestrian safety in the park. Your attention to this matter is greatly appreciated and I look forward to hearing from you.

With best regards,

Sincerely,  
  
Paul Sarbanes  
United States Senator

PSS/cas

JUL 28 2003

MS. JONES: Tuesday evening I spoke as a resident of Ward 3 here in the District of Columbia. This evening I'm here to read a statement from D.C. Council Member Jack Evans Ward 2, D.C. Council Member Sharon Ambrose Ward 6 and D.C. Council Member Phil Mendelson an at large member of the Council. And I'm reading their statement for them.

"Residents of Washington, D.C. deeply appreciate having such a fine natural resource as Rock Creek Park in the midst of our city. The park enhances the quality of life in the Nation's Capital by providing a quiet oasis for recreation and enjoyment of nature. We understand that several approaches are under consideration for managing automobile traffic in your general management plan process for Rock Creek Park. Many of our constituents are deeply concerned about the volume of automobile traffic in the park and how it impacts their ability to enjoy the park's natural resources. Constituents also want to ensure that any changes in the park traffic patterns do not adversely affected their neighbors.

We're pleased to learn that the Park Service has decided to consider a proposal to establish weekday recreation zones on portion of Beach Drive north of Broad Branch Road except during rush hour. We believe this approach offers the potential for providing weekday recreation opportunities in Rock Creek Park while minimizing possible traffic impacts in adjacent neighborhoods. Provides that such measures are found not to adversely impact adjacent neighborhoods, we urge the Park Service to implement them in its final management plan for the park. The Park Service's forwarded looking decision several years ago to create weekend recreation zones has turned upper Beach Drive into a center for recreation and nature that attracts people from all over the Washington area. We look forward to the possibility of making the Rock Creek Valley a place for mid-day and evening recreation on weekdays as well.

Thank you for your consideration. Jack Evans, Sharon Ambrose and Phil Mendelson."

**NEAL R. GROSS**  
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1323 RHODE ISLAND AVE. N.W.  
WASHINGTON D.C. 20005-3701

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COUNCIL MEMBER FENTY: Good evening. For the record, my name is Adrian Fenty. I live in D.C. I am the representative on the Council of the District of Columbia for Ward Four which is approximately 74,000 residents of D.C. At the onset, allow me to state that I feel strongly that there are well-intentioned advocates on both sides of this issue.

As a representative for Ward Four which encompasses most of the portion of Beach Drive that is discussed in this plan however I submit the following statement after hearing from hundreds of my constituents who have advised me overwhelmingly of their desire to support Alternative B, no further closures. When Congress defined and dedicated Rock Creek Park in 1890, it established roadways for the purpose of driving, wider paths for horseback riding, and footways for pedestrians. I see no reason to change what Congress has set up. It has improved the quality of life for all residents, so I oppose limiting access to Rock Creek Park any more than it is already.

The proposed restrictions do not have the support of the community as a whole. Already we have seen community opposition to the Park Service plan to close Beach Drive. Many ANC's and community organizations including ANC-4A, ANC-4C, Crestwood League, 16<sup>th</sup> Street Heights, Shepherd Park Citizens Association, and the Gateway Coalition in my ward and others from other wards have taken positions against restricting the use of Beach Drive.

The proposed restrictions would benefit a small margin of the community at the expense of many. These limitations would serve the needs of special interests and wrongly exclude the majority of park users including senior citizens, the young, and the physically challenged. The proposed restrictions also create public safety concerns and unfairly burden the surrounding neighborhoods and communities with increased traffic and restricted travel options.

Beach Drive is one of two principal roads within Rock Creek Park. These roads have proved to be vital to the future of development of the nation's capital and to the city's economic improvement and residential desirability. The roads and trails should continue to form a historically significant circulation system that contributes a distinctive layered historical character to the park and permit full public access for all of D.C.

It also is unclear to me from the proposed restrictions exactly what the problem is that we are trying to solve. We know it isn't an environmental issue. The studies have not identified it as such. There is no lack of hiking trails in Rock Creek Park. We have miles and miles of such. If we need more paved biking trails, then the answer is not to exclude the majority of users for the benefit of a few. We need to look at enhancing existing trails or making new ones.

Closing Beach Drive reduces the efficiency of our transportation system. Restricting traffic forces cars onto already over burdened routes. As the third most traffic congested city in the nation, we cannot afford to give away valuable travel routes. Moreover, it is going to cost a lot of money to keep our citizens from using Beach Drive. It makes no sense to spend so much money to implement and maintain a restrictive road closure that excludes most citizens and lacks community support.

We should work to enhance the recreational features of the park for everyone. We cannot allow a change in the use of Beach Drive from the historic use of scenic driving to other uses. Closure of sections of Beach Drive north of Broad Branch Road would eliminate the traditional visitor experience of automobile touring along the length of the park.

Moreover, Rock Creek Park was created for all of us to enjoy and should not be converted to a commuters only road. As we move forward, if we need to develop new ways to manage Rock Creek Park, those solutions must be inclusive, not exclusive and should have the support of the community. As Frederick Law Olmstead, one of our greatest American landscape architects stated, "A connected system of parkways is manifested far more complete and useful than a series of isolated parks."

We should not limit access to Beach Drive. Rather, we should enhance public access to Rock Creek Park as was intended by its original designer and so wisely dedicated to the public by Congress. Thank you.

**NEAL R. GROSS**

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COUNCIL OF THE DISTRICT OF COLUMBIA  
WASHINGTON, D.C. 20004  
www.dccouncil.washington.dc.us  
Office: (202) 724-8052  
Fax: (202) 724-8120

ADRIAN M. FENTY  
Councilmember - Ward 4  
Democrat

Committee Member  
Economic Development  
Education, Libraries and Recreation  
Public Services  
Subcommittee on Human Rights  
Property Management, and Latino Affairs

May 22, 2003

Adrienne Coleman, Superintendent  
Rock Creek Park  
3545 Williamsburg Lane, N.W  
Washington, D.C. 20008-1207

Dear Ms. Coleman:

Please find, attached, recent correspondence from Advisory Neighborhood Commission (ANC) 4C opposing any and all changes to the Rock Creek Park General Management Plan. Also, find attached, a copy of my statement, regarding my position on this matter.

Should you have any further concerns regarding this matter please feel free to contact me at (202) 724-8828 or via e-mail at [afenty@dccouncil.us](mailto:afenty@dccouncil.us).

Sincerely,

Adrian Fenty  
Councilmember, Ward 4

AMF/lb

Attachments

EX-114  
JUN 04 2003  
BY: [illegible]

**ADVISORY NEIGHBORHOOD COMMISSION 4C**  
**May 13, 2003**

**RESOLUTION**

**Opposing any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic.**

**WHEREAS, The National Park Service, Department of Interior, announced in the Federal Register on March 14, 2003, the availability of a draft Environmental Impact Statement and General Management Plan for Rock Creek Park, Washington, DC.**

**WHEREAS, The Environmental Impact Statement and General Management Plan evaluates the following four alternatives for Rock Creek Park: (1) Alternative A would generally retain the current scope of visitor uses with improvements in visitor safety, better control of traffic volumes and speeds through the Park; (2) Alternative B would propose no actions at all; (3) Alternative C proposes to close three sections of Beach Drive to automobiles at all times and, thereby, eliminate traffic in much of the northern part of the Park; (4) Alternative D proposes to close three segments of Beach Drive in the northern portion of the Park to motorized vehicles for a 6-hour period, from 9:30 a.m., to 3:30 p.m., on weekdays.**

**WHEREAS, Alternative D, which only completely opens Beach Drive at rush hour times, would facilitate commuter access through the Park but would have an adverse effect on local motorists and residents east and west of Rock Creek Park who will no longer be able to traverse the Park through local streets. They would be forced to go miles out of their way, even into Maryland in order to reach either side of the park.**

**WHEREAS, Alternatives C and D prohibit access to Beach Drive from most roads and increase traffic on streets that are already heavily trafficked such as 16th Street NW, 14th Street NW, Military Road, Piney Branch Parkway and 13th Street, Park Road, and Blagden Avenue.**

**WHEREAS, The proposal, by prohibiting automobile access to the park, benefits the young and mobile but penalizes many Seniors, the handicapped, small children and others with mobility challenges from using the park.**

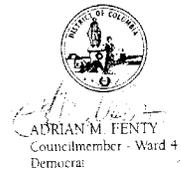
**WHEREAS, The proposal, by prohibiting automobile access to the park, blocks access to emergency evacuation routes at Rock Creek Parkway and George Washington Parkway.**

**THEREFORE, It is Resolved, That the Advisory Neighborhood Commission 4C opposes any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic.**

**Approved at a duly noticed meeting on May 13, 2003, with a quorum present.**

  
**Timothy A. Jones**  
**Chairman**  
**Advisory Neighborhood Commission 4C**

  
**Kristen L. Barden**  
**Secretary ANC 4C**



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3005-

Committee Member  
Economic Development  
Education, Libraries and Recreation  
Public Services  
Subcommittee on Human Rights  
Property Management, and Latino Aff

**May 20, 2003**

**Fenty's Comments on the Rock Creek Park Draft Management Plan**

At the outset, allow me to state that I feel strongly that there are very well-intentioned advocates on both sides of this issue. As the representative for Ward 4, which encompasses most of the portion of Beach Drive that is discussed in this Plan, however, I submit the following statement after hearing from hundreds of my constituents who have advised me of their desire to support Alternative B - no further closures. When Congress defined and dedicated Rock Creek Park in 1890, it established roadways for the purpose of driving, bridle paths for horseback riding, and footways for pedestrians. I see no reason to change what Congress has set up. It has improved the quality of life for our residents, so I oppose limiting access to Rock Creek Park any more than it is already.

First and foremost, the proposed restrictions do not have the support of the community as a whole. Already, we have seen a groundswell of community opposition to the Park Service plan to close Beach Drive. Many ANC's and community organizations (including ANC4A, ANC4C, Crestwood Neighborhood League, 16<sup>th</sup> Street Heights, Shepherd Park Citizen's Association and the Gateway Coalition) in my ward and others have taken positions against restricting the use of Beach Drive to hikers and bikers.

Second, the proposed restrictions would benefit a small margin of the community, at the expense of many. These limitations would serve the needs of special interests, and wrongly exclude the majority of park users, including senior citizens, the young, and the physically challenged. The proposed restrictions also create public safety concerns, and unfairly burden the surrounding neighborhoods

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and communities with increased traffic and restricted travel options.

Beach Drive is one of two principal roads within Rock Creek Park. The paved roads and trails serve as connectors to some of Washington's great architecture. These roads have proved to be vital to the future development of the national capital and to the city's economic improvement and residential desirability. The roads and trails should continue to form a historically significant circulation system that contributes a distinctive layered historic character to the park and permit full public access for all of DC.

It also is unclear to me from the proposed restrictions exactly what the problem is that we are trying to solve. We know it isn't an environmental issue; the studies have not identified it as such.

There is no lack of hiking trails in Rock Creek Park. We have miles and miles of hiking trails that are under-utilized.

If we need more paved biking trails, then the answer is not to exclude the majority of users from our historic parkways for the benefit of a few. Instead, we need to look at enhancing existing trails or making new ones. The Park Service's own recommendations suggest that separate bikeways are the safest alternative. We may be able to enhance some of the underutilized trails; or create new paved trails away from the roadway.

Closing Beach Drive reduces the efficiency of our transportation system. Restricting traffic forces cars onto already overburdened routes. DC residents depend on our transportation system which is already overcrowded. As the third most traffic congested city in the nation, we cannot afford to give away valuable travel routes. In an evacuation, experts advise people to avoid major arteries and use alternate routes.

Moreover, it is going to cost a lot of money to keep our citizens from using Beach Drive. It makes no sense to spend so much money to implement and maintain a restrictive road closure plan that excludes most citizens and lacks community support. We should work to enhance the recreational features of the

park for everyone, in keeping with the historic and cultural character of the Park which has been the province of all for so many decades. For these reasons I also oppose the mayor's plan for a test closure of Beach Drive after construction of 16<sup>th</sup> Street is completed. The mayor's proposal to test the closure of Beach Drive doesn't have broad support in the community.

We cannot allow a change in the use of Beach Drive from the historic use of scenic driving to other uses. Closure of sections of Beach Drive north of Broad Branch Road would eliminate the traditional visitor experience of automobile touring along the length of the park.

Moreover, Rock Creek Park was created for all of us to enjoy and should not be converted to a commuters-only road. The current weekend restrictions are a great compromise since they allow most families to access the Park on the two (2) days when they are not at work or school. Further restricting Beach Drive would unfairly and unnecessarily deny the public the traditional and historic experience of touring Rock Creek Park, and also would rob citizens the cultural character so many DC residents have enjoyed and cherished for nearly 100 years.

As we move forward, if we need to develop new ways to manage Rock Creek Park, those solutions must be inclusive—not exclusive and should have the support of the community.

As Frederick Law Olmsted, one of our greatest American landscape architects stated, "A connected system of parks and parkways is manifestly far more complete and useful than a series of isolated parks." We should not limit access to Beach Drive, rather; we should enhance public access to Rock Creek Park as was intended by its original designer and so wisely dedicated to the public by Congress.

-END-

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Page 1 of 5

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COUNCIL OF THE DISTRICT OF COLUMBIA  
THE WILSON BUILDING

Office Of The Secretary  
(202) 724-8080 (Voice)  
(202) 347-3070 (Fax)

JUN 10 2003

Ms. Adrienne Coleman  
Superintendent  
National Park Services, Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008-1207

Dear Ms. Coleman:

The Council of the District of Columbia directed me to send you a copy of Council Resolution 15-122, "Sense of the Council on the National Park Service's Draft **General Management Plan** for Rock Creek Park Emergency Resolution of 2003 ", adopted by the Council during the June 3, 2003 Legislative Meeting.

If you have any questions regarding this resolution, please contact me on 724-8080.

Sincerely,

Phyllis Jones  
Secretary to the Council

Enclosure

ENROLLED ORIGINAL

A RESOLUTION

15-122

IN THE COUNCIL OF THE DISTRICT OF COLUMBIA

June 3, 2003

To declare, on an emergency basis, the sense of the Council on the National Park Service's Draft General Management Plan for Rock Creek Park.

RESOLVED, BY THE COUNCIL OF THE DISTRICT OF COLUMBIA, That this resolution may be cited as the "Sense of the Council on the National Park Service's Draft General Management Plan for Rock Creek Park Emergency Resolution of 2003".

Sec. 2. The Council finds that:

(1) The National Park Service ("NPS") in March 2003 released a draft general management plan and environmental impact statement that analyzes alternatives, one or a combination of which ultimately will be selected to guide management of Rock Creek Park for the next 15 to 20 years. NPS has invited public comment on the plan until July 15, 2003.

(2) Alternative A, Improved Management of Established Park Uses, would improve visitor safety, better control traffic volumes, and speeds through the park by implementing traffic-calming measures and high-occupancy vehicle ("HOV") restrictions during rush-hour periods in the primary travel direction of the traffic, enhance interpretation and education opportunities, and improve the use of park resources, especially cultural resources. This alternative generally would retain the current scope of visitor uses.

(3) Alternative B, Continue Current Management/No-Action, would continue the current management practices into the future.

(4) Alternative C, Nonmotorized Recreation Emphasis, would eliminate automobile traffic along much of the northern portion of Beach Drive, and better control traffic volumes and speeds elsewhere. Management of resources other than traffic would be the same as in Alternative A.

(5) Alternative D, Mid-Weekday Recreation Enhancement, would eliminate automobile traffic along much of the northern part of Beach Drive from 9:30 a.m. to 3:30 p.m. each weekday, which is the part of Beach Drive currently closed to traffic on weekends and holidays. Management of resources other than traffic would be the same as Alternative A. Alternative D is the National Park Service's preferred alternative.

(6) Rock Creek Park was established through an act of Congress in 1890 and is

**ENROLLED ORIGINAL**

**ENROLLED ORIGINAL**

one of the oldest and largest natural urban parks in the United States. The park's urban character is described in the act, which calls for both "a pleasure park or pleasure ground for the benefit and enjoyment of the people," as well as "roadways and bridle paths, to be used for driving and for horseback riding, respectively, and footways for pedestrians."

(7) Rock Creek Park's 1,754 acres annually provide recreation, respite, and educational opportunities for thousands of citizens locally, regionally, and nationally. The park's amenities and attractions, enjoyed by so many, include the National Zoo, Peirce Mill, Klingle Farm, Rock Creek Horse Centre (including the National Center for Therapeutic Riding), National Park Service Nature Center, Brightwood Recreation Area (including the Carter Barron Amphitheater and the tennis stadium), Rock Creek Golf Course, recreation and bridal trails, picnic groves, playground areas, and community gardens.

(8) Rock Creek Park's roadways not only make the scenic vistas of the park readily available to the public, they also serve as major transportation arteries within the District. According to traffic studies conducted for the National Park Service, on an average weekday, approximately 55,000 cars travel on the busiest portion of Rock Creek and Potomac Parkway, and approximately 25,000 cars travel on the busiest portion of Beach Drive.

(9) One scenario proposed by the National Park Service in developing its environmental impact statement would essentially preserve the status quo, maintaining the park as it has evolved thus far, with emphasis on improved maintenance of the current facilities.

(10) Alternate scenarios would greatly alter the present nature and character of the park. The alternatives include changing or eliminating many of the current vehicular access features and placing a greater emphasis on the recreational or urban wilderness aspects of the park.

Sec. 3. (a) It is the sense of the Council that the current management plan for Rock Creek Park, Alternative B, has been greatly successful and has served its many purposes well in benefitting the citizens of the District of Columbia, the region, and the nation.

(b) It is also the sense of the Council that the current traffic management plan for Rock Creek Park, contained in Alternative B, should continue as the preferred policy of the National Park Service because all of the other alternatives currently under consideration include new vehicular restrictions on Rock Creek Park's roadways that would divert substantial traffic to other existing major north-south routes in the city, such as 16th Street, 14th Street, Connecticut Avenue, Massachusetts Avenue, and Wisconsin Avenue, and would considerably overburden these major thoroughfares and their adjacent residential streets. The District is already suffering adverse transportation, economic, and environmental impact from other federally-imposed vehicular traffic restrictions.

(c) However, the Council supports traffic management improvements, outlined in Alternative C, which are designed to increase safety and reduce speeds along Rock Creek's roadways, such as the traffic-calming devices proposed for Beach Drive and the safety

improvements proposed for the intersection of Beach Drive and Rock Creek and Potomac Parkway.

(d) It is further the sense of the Council that the non-traffic management plan that calls for improved recreational facilities and other park resources, contained in Alternative A, should also be implemented. These improvements would:

- (1) Upgrade some recreational trails and rehabilitate deteriorating segments;
- (2) Rehabilitate the Peirce Mill complex to focus on the history of milling and land use in the area and rehabilitate the Peirce Mill Barn for use in interpretation and education;
- (3) Move the park administrative offices out of the Peirce-Klingle Mansion at Linnaean Hill to commercial office space outside the park or to a new office facility that would be constructed at the park maintenance yard;
- (4) Rehabilitate the Linnaean Hill complex for adaptive use compatible with park values;

(5) Move the U.S. Park Police substation out of the Lodge House on Beach Drive at Joyce Road to a commercial space outside the park or to a new park police substation that would be constructed near the existing U.S. Park Police H-3 stables;

(6) Convert the Lodge House to a visitor contract station to provide park orientation, information, and interpretation; and

(7) Rehabilitate and expand the nature center and upgrade the planetarium to improve effectiveness of public programs.

Sec. 4. The Secretary to the Council shall transmit a copy of this resolution, upon its adoption, to the Director of the National Park Service and to the Superintendent of Rock Creek Park.

Sec. 5. This resolution shall take effect immediately.

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Page 1 of 1



COUNCIL OF THE DISTRICT OF COLUMBIA  
WASHINGTON, D.C. 20004  
Council Period Fifteen

**RECORD OF OFFICIAL COUNCIL VOTE**

Docket No. PR15-246 Resolution No. R15-122

Action & Date ADOPTED, 06-03-03

Item on Consent Calendar

ROLL CALL VOTE -Result \_\_\_\_\_ (.....)

Councilmember	Aye	Nay	NV	AB	Councilmember	Aye	Nay	NV	AB	Councilmember	Aye	Nay	NV	AB
Chmn. Cropp	X				Chavous	X				Orange	X			
Allen	X				Evans		X			Patterson	X			
Ambrose	X				Fenty	X				Schwartz	X			
Brazil		X			Graham	X								
Catania	X				Mendelson		X							
X - Indicate Vote				AB - Absent				NV - Present, Not Voting						

VOICE VOTE Result APPROVED

Absent ALL PRESENT

Recorded Vote (On Request) BRAZIL, EVANS AND MENDELSON VOTED NO

**CERTIFICATE OF RECORD**

[Signature]  
Secretary to the Council

June 10, 2003  
Date



COUNCIL OF THE DISTRICT OF COLUMBIA  
WASHINGTON, D.C. 20004

Phil Mendelson  
Councilmember At-Large

Office: (202) 724-8064  
Fax: (202) 724-8099

July 15, 2003  
(By e-mail, hardcopy to follow)

Ms. Adrienne A. Coleman  
Superintendent, Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, DC 20008

RE: General Management Plan

Dear Superintendent Coleman:

I am writing to provide my comments on the draft General Management Plan for the general management of Rock Creek Park for the next 15-20 years. I support the National Park Service's preferred alternative which would close three segments of Beach Drive in the northern portion of the park to motorized vehicles for a 6-hour period (9:30 a.m. to 3:30 p.m.) each weekday.

I applaud the vision of this management plan which recalls the establishment of the lands lying on both sides of Rock Creek to be "perpetually dedicated and set apart as a public park or pleasure ground for the benefit and enjoyment of the people of the United States... [and to] provide for the preservation from injury or spoilation of all timber, animals, or curiosities within said park, and their retention in their natural condition, as nearly as possible." (D.C. Code §§ 10-140 & 10-142; emphasis added)

The diversion of 150-200 cars per hour from Beach Drive to alternative routes would be negligible in terms of our transportation system, while the proposed closing would improve recreational quality and provide environmental benefits. The midday closure would not deny motorized, recreational access: all existing parking lots and all but two picnic areas in the park would remain accessible to cars.

When I campaigned for office in 1998 I publicly supported closing the upper segments of Beach Drive 24 hours per day, seven days a week. My position today is consistent with what I promised the voters. I believe the preferred alternative should be tried - for the benefit of the park and the future generations who will use it.

Sincerely,  
[Signature]  
Phil Mendelson

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Page 1 of 3

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Page 2 of 3



COUNCIL OF THE DISTRICT OF COLUMBIA  
WASHINGTON, D.C. 20004

KATHY PATTERSON  
COUNCILMEMBER, WARD 3

CHAIRPERSON  
COMMITTEE ON THE JUDICIARY

OFFICE: (202) 724-8062  
FAX: (202) 724-8118

July 17, 2003

Adrienne A. Coleman, Superintendent  
Rock Creek Park  
National Park Service  
3545 Williamsburg Lane NW  
Washington, DC 20008

By facsimile and mail

Dear Ms. Coleman,

I am forwarding for your attention a letter from my constituent, Bill Rogers, concerning traffic problems on Rock Creek Parkway, and his suggestions for improvement.

Please consider his comments as work on the general management plan continues. Thank you for your time, interest and consideration.

Sincerely yours,

*Kathy Patterson*  
Kathy Patterson

RECEIVED  
JUL 18 2003  
COMMUNICATIONS SECTION

Enclosures

Cc: Bill Rogers

*Car you get them to TRY & these are MINOR adjustments producing MAJOR imp*

nps\_rocr\_gmp@nps.gov, 06:31 PM Sunday 7/13/03 -0400, Comments on alternatives AND ST

To: nps\_rocr\_gmp@nps.gov  
From: Bill Rogers  
Subject: Comments on alternatives AND SUGGESTIONS TO CHEAPLY IMPROVE TRAFFIC FLOW  
Cc:  
Bcc:  
Attached:

July 13, 2003

Dear Park Service representative:

Thank you for accepting these comments by e-mail, and including them in the public comments on the management alternatives for Beach Drive. Please also refer this letter to personnel in charge of traffic flow and design, as the fourth paragraph onwards proposes specific solutions to existing safety and environmental problems.

It is important to me for you to realize and respect the reality that many members of our local Sierra Club chapter, the Washington Area Bicyclist Association, and other environmental groups strongly dissent from the advocacy positions of those organizations on this issue. I'm a member of both of these groups, as well as many other environmental groups, and I strongly support ALTERNATIVE B (to leave Beach Drive as it is). I'm profoundly opposed to Alternative C, which is supported by the Sierra Club.

I believe further restrictions on automotive use of Beach Drive are directly contrary to the interests of the citizens of the District, and to our economic competitiveness and quality of life. I also do not believe it is representative of the opinions of our city's citizens to lose Beach Drive as a major north-south route for automobile traffic. My only exception to this would be that IF rush hour traffic flows produced HEAVY backups, I would support rush hour HOV restrictions. Any claims that traffic would not become radically worse on other north-south routes should not be accepted unless STRONGLY supported through traffic-flow modelling.

I also ask you to please redesign the following two intersections to improve traffic flow and safety, thereby reducing auto emissions and wasted time. The Park Service should address its own direct contributions to bad air quality and traffic flow before further restricting the behavior of local taxpayers.

1. The unnecessary and long backups where southbound Beach Drive traffic attempts to merge with southbound Rock Creek Parkway.
2. The unnecessary and long backups where eastbound traffic off the Roosevelt Bridge attempts to merge onto the southbound Potomac Pkwy.

In both of the traffic nightmares above, the simple addition of a few "New Jersey barriers" would VASTLY improve traffic flow. Drivers currently wait at both intersections for ALL lanes to be free of cars before proceeding. At

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nps rocr\_gmp@nps.gov, 06:31 PM Sunday 7/13/03 -0400, Comments on alternatives AND SU

Beach Drive, the barriers would tell them visually that northbound traffic on Rock Creek Parkway in the right hand lane should NOT prevent them from proceeding. At the Roosevelt Bridge, the barriers would tell them visually that southbound traffic on the Potomac Parkway is restricted to the right hand lane and that the left hand southbound lane is totally available to them. These two SHORT sections of auto barriers would cost mere peanuts even by Park Service standards, and will not harm the visual beauty of the park (particularly if they are designed by the Park Service and not bought off-the-shelf).

I also urge you to begin the planning and funding process to completely redesign the intersection of Beach Dr. and the Rock Creek Parkway, to provide nonstop southbound access from Beach Drive onto the Parkway, and to provide a safe pedestrian and bicycle overpass or underpass to SEGREGATE bicycle and pedestrian traffic from the urban traffic flow. Please also begin the planning and funding process to extend the bicycle and pedestrian paths above Broad Branch Dr. to the Maryland state line and beyond. If you were more responsive to the general public which uses these facilities than to a small, organized minority, then you would already have addressed these issues rather than spending your staff resources on these divisive management alternatives. The needs of all users, drivers and bicyclists, would already have been met.

Thank you for considering these comments, and including them in the public record.

Sincerely,

Bill Rogers

=====END OF MESSAGE=====

A suggestion for those of you ALSO overwhelmed by junk email ("SPAM"), go to the link below to get a free copy of the "honorware" program "MailWasher." It's \$3 on the honor system, & allows you to send a computer code back to the email sender saying that your email address is no good (rather than asking to be removed, which just confirms it is a good address). Possibly infected emails can be reviewed and deleted before being downloaded:

<[www.MailWasher.net](http://www.MailWasher.net)>

[-----]



Council of the District of Columbia  
1350 Pennsylvania Avenue, N.W., Suite 105  
Washington, D.C. 20004

Carol Schwartz  
Councilmember, At-Large

Tel: (202) 724-8105  
Fax: (202) 724-8671  
carol.schwartz@dc.gov

May 20, 2003

Ms. Adrienne Coleman  
Superintendent, Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008

Dear Superintendent Coleman:

I am writing to state my opinion on the National Park Service's *General Management Plan* for Rock Creek Park. It appears that the Park Service's preferred course of action would be to close the northern part of Beach Drive, every day—not just on weekends, as is now the case—from 9:30 a.m. until 3:30 p.m. What this proposal says to me is that if you are not a bicyclist or recreationalist, your only option would be to battle rush hour to enjoy the park by automobile. What about our seniors or our disabled, not to mention those with time constraints who would like an opportunity—albeit briefly—to commune with nature. Why don't they count?

Ms. Coleman, Rock Creek Park is a treasure for all citizens of the District of Columbia as well as to its visitors. It does not exist merely for those persons who bicycle, jog or walk—although those groups are given sole access to Beach Drive on weekends. Rock Creek Park does have cycling trails, walking and jogging paths, and yes, it has other roadways. But I am of the firm belief that the entire Park should be made available to everyone at all times. However, since an agreement was made years ago to close this same portion of Beach Drive on weekends, and because I am also a staunch proponent of compromise, I support keeping the current closure schedule for Beach Drive as is.

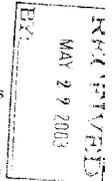
I also feel that if Beach Drive were not open to motorists at any time from Monday to Friday, then the impact on residential neighborhoods such as Cleveland Park, Crestwood and Mount Pleasant would be severe.

Perhaps in the future as the Washington region makes inroads into its transportation problems, there may come a time when I think we might be able to justifiably place further limits on motorists who utilize Beach Drive. However, at this time, it is my recommendation that you **do not close** the northern section of Beach Drive from Mondays through Fridays, from 9:30 a.m. until 3:30 p.m. Please keep the status quo.

Sincerely,

Carol Schwartz  
Councilmember At-Large  
Chair, Committee on Public Works  
And the Environment

CS/js



ROCR 3038  
Page 1 of 1

ROCR 1736  
Page 1 of 8

MR. SLATTERY: Good evening. I'm representing Council Member Schwartz who resides in D.C. "Dear Superintendent Coleman. I am writing to state my opinion on the National Park Services general management plan for Rock Creek Park. It appears that the Park Service's preferred course of action would be to close the northern part of Beach Drive everyday, not just on weekends which is now the case from 9:30 a.m. until 3:30 p.m.

What this proposal says to me is if you are not a bicyclist or a recreationalist your only option would be to battle rush hour to enjoy the park by automobile. What about our seniors or our disabled, not to mention those with time constraints who would like an opportunity albeit briefly to commune with nature? Why don't they count?

Ms. Coleman, Rock Creek Park is a treasure for all citizens of the District of Columbia as well as to its visitors. It does not exist merely for those persons who bicycle, jog, or walk although those groups are given sole access to Beach Drive on weekends. Rock Creek Park does have cycling trails, walking and jogging paths, and yes it has other roadways, but I am of the firm belief that the entire park should be made available to everyone at all times.

However, since an agreement was made years ago to close this same portion of Beach Drive on weekends and because I am also a staunch proponent of compromise, I support keeping the current closure schedule for Beach Drive as is. I also feel that if Beach Drive were not open to motorists at any time from Monday to Friday then the impact on residential neighborhoods such as Cleveland Park, Crestwood, and Mount Pleasant would be severe.

Perhaps in the future as the Washington Region makes in-roads into its transportations problems, there may come a time when we might be able to justifiably place further limits on motorists who utilize Beach Drive. However, at this time, it is my recommendation that you do not close the northern section of Beach Drive from Mondays through Fridays from 9:30 a.m. until 3:30 p.m. Please keep the status quo. Sincerely, Charles Schwartz, Council Member at-large."

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON D.C. 20005-3701

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**Department of Health**  
**Environmental Health Administration**  
**Bureau of Environmental Quality**

★ ★ ★

Office of the Bureau Chief



July 7, 2003

Adrienne A. Coleman  
Superintendent, Rock Creek Park  
3545 Willamsburg Lane, NW  
Washington, DC 20008

Dear Ms Coleman:

We have reviewed the draft General Management Plan/Environmental Impact Statement for Rock Creek Park. Our comments are attached and we are available to discuss them with you.

We are particularly concerned with an issue that is not dealt with in the document - routine maintenance of the Park. There are several invasive species of plants and animals that are having a devastating effect upon many areas in and outside of the Park. Because the Park is surrounded by urban areas with impervious surfaces, storm flows have and are causing stream channel instability and a loss of habitat. Both of these issues are operation and maintenance issues. We believe that O&M budgets need to be increased in order to protect and improve the Park ecosystem.

We are looking forward to the beginning of construction this Fall to eliminate the fish blockages in Rock Creek and appreciate the cooperation as we work toward our mutual goal of improving the environment.

Sincerely,

  
James R. Collier  
Chief

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**Department of Health**  
**Environmental Health Administration**  
**Bureau of Environmental Quality**

The Draft General Management Plan has been reviewed for potential air and water quality impacts that might result from activities associated with the Rock Creek Park development. The Bureau of Environmental Quality (BEQ) review of the draft document reveals the following:

**1. AIR QUALITY**

The draft document contends that measured carbon monoxide (CO) concentrations in the park areas drift from Washington, DC proper, consequently CO emissions is an area-wide problem that could not be worsened by Rock Creek-related projects.

*The BEQ disagrees because the incremental contribution of localized projects to CO hotspots is a local concern. Consequently, the BEQ takes the position that proper air resource management will improve the local air quality, and by extension the overall regional situation. Thus, the incremental levels of CO pollution should not and must not be ignored.*

In analyzing the impacts on air quality of the park management plan, the draft document did not analyze dust and smoke emissions because the occurrences were believed to be both infrequent and of small magnitudes that overall contributions to the park air quality is negligible.

*While BEQ recognizes variability in levels of source emissions, this agency advises that proponents of projects thoroughly evaluate contemplated activities for air quality impacts. This of course is best done during the planning phase of a development, as is currently the case. Consequently, project components such as Administration and Operations which might involve: (1) New Construction, (2) Alteration of traffic pattern, (3) Rehabilitation / Modification, (4) Installation of a HVAC system, etc, will require BEQ approval.*

The air quality analysis was based on 1996 air quality monitoring. The CO concentration determined in 1996 was based on a 1990 Average Weekday Traffic Volume. The consultant, Robert Peccia & Associates et al., projected this 1996 data to the year 2020 to arrive at a number that formed the basis for the air quality impact analysis associated with the Rock Creek Park and Rock Creek Potomac Parkway project.

*It is the opinion of the BEQ that data validity is a concern and requires justification. The BEQ has two concerns with this methodology:*

*(1) The use of a seven (7) year old air quality monitoring data casts doubt whether the modeling prediction would actually capture current air quality conditions in the Rock Creek Park environs.*

*(2) A similar argument can be made in the adoption of a 1990 Average Daily Traffic Volume in the projection of CO vehicular loadings for the year 2020.*

Project components such as Administration and Operations which might involve: (1) New Construction, (2) Alteration of traffic pattern, (3) Rehabilitation / Modification, (4) Installation of a HVAC system etc, may be subject to the Environmental Impact Screening Form process, using the latest available data.

The document under review further suggested that the traffic modeling for the year 2020 did not identify any changes in regional traffic arising from management actions at Rock Creek Park, therefore the air quality analysis focused on incremental changes at each roadway intersections.

*The BEQ believes that this approach is acceptable provided that the indicated traffic model has merits.*

*Why were HOV-2 restrictions not considered with Alternative D? Page 62 states: "By the year 2020, with Alternative B commuter traffic along some portions of Beach Drive would routinely near gridlock conditions." This would be the same level of commuter traffic as under Alt. D. While modeling may not reveal a significant difference in traffic within Rock Creek under HOV-2 restrictions, it seems that it is a necessary first step in encouraging individuals to carpool and for creating an impetus for other roadways to be classified as HOV-2 during commuting hours. Maintaining status quo would not, in the long-term, improve either air or water quality.*

*Also, the text on pg. 344 is confusing as to how estimates of HOV-2 usage were obtained. It states "consultant estimates of average auto occupancy for each trip purpose were utilized based on data collected within project study area during this study as well as from other similar urban areas." Does this mean that the number of vehicles with greater than 2 individuals were counted as those that would use HOV-2 lanes? It does not seem reasonable to use figures obtained from Rock Creek when HOV-2 restrictions do not currently exist. Additionally, what are some of the modeling assumptions in regards to HOV-2--does the modeling assume that people would take other routes, rather than carpool, and this is why a reduction in volume would not be observed?*

Text: pg. 19 "The analysis showed that Alternative D is environmentally preferred by a close margin."

*This is different than the text on pgs. 64-65, where it is stated that the environmentally preferred alternative is Alternative C. Need to clarify why D was selected.*

**2. WATER QUALITY**

Text: pg. 170: “If administrative and Park Police functions were relocated within the park, new impervious surfaces, such as building roofs and parking areas, could cause small, long-term increases in runoff volumes and pollutant loadings. ... The new facilities also could be designed to minimize impervious surfaces and modifications could be made to existing areas, such as parking lots, so that no net increase in runoff occurred.”

*The BEQ recommends that any buildings that are constructed/remodeled in Rock Creek Park or in the Rock Creek Park watershed utilize low impact development (LID) to reduce increased imperviousness in the watershed. Some suggested design modifications include the installation of green roofs, creation of rain gardens and the use of vegetated swales.*

Text: pg. 170: “Automobile traffic on Beach Drive and the parkway adjacent to Rock Creek would be reduced by an average of about 25%, this could result in lower pollutant loadings (sediment, oils and grease, and metals washed from road surfaces) of the creek during and after storm events. This reduced loading would produce beneficial, long-term negligible to measurable effects on water quality. This beneficial effect would be further increased when combined with such actions as the revegetation of road shoulders with dense ground cover, another BMP frequently applied to improve stream water quality.”

*The traffic studies did not find that within the Rock Creek watershed traffic would substantially decrease under any of the alternative—“The traffic modeling for the year 2020 did not identify any changes in regional traffic because of management actions at Rock Creek Park. Instead, the alternative would redistribute the same traffic volume through different roadways” (pg. 162). Automobiles within the watershed would still be releasing these pollutants, and while it is possible that some would be intercepted/filtered by vegetation, most of these pollutants would eventually enter Rock Creek, and it is unlikely that pollutant levels would be noticeably lower.*

*For the BMP practices, BEQ suggests that it be specified that native vegetation be used for ground cover and that the planting of riparian trees and no mow zone along portions of Rock Creek also be considered.*

Text: pg. 171 “Compared to future conditions occurring under the alternative of no action (Alternative B), Alternative A would produce long-term improvements in the water quality and stormwater hydrology. Cumulatively, the incremental effects of the improvements would be major and beneficial.”

*It is not clear how the alternative provides major and beneficial improvements to water quality, as the only primary change would be the use of BMPs at park facilities and during construction. As mentioned above, BEQ does not believe that reduction in traffic along the parkway would correlate to reduction to pollutants entering Rock Creek, as overall traffic numbers are anticipated to remain the same within the entire watershed. If the document is suggesting that Alternative A, in conjunction with other planned activities, would be*

*beneficial the sentence should be reworded—“The incremental effects of the improvements, in conjunction with other planned WASA and Woodrow Wilson Bridge mitigation projects, would have a major and beneficial improvement to water quality”.*

*Also, no mention is made in the Impacts on Rock Creek and tributaries or in the cumulative impact section on the impacts of tailpipe emissions on water quality via atmospheric deposition. Burning of fossil fuels has been known to increase nitrogen oxide (Nox) inputs to water. Reductions in tailpipe emissions would be beneficial to both air and water quality.*

**3. WETLANDS AND FLOODPLAINS**

Text: pg. 173 “Alternative A would include improving and possibly re-routing of the recreation trails along Rock Creek, portions of which are in the 100-year floodplain. Trail construction in a floodplain is acceptable under NPS Floodplain Management Guidelines (NPS 1993a). Short-term, adverse effects on the 100-year floodplain capacity could occur during construction.”

*BEQ agrees that trails should be re-routed out of the 100-year floodplain. BEQ suggests that no new trails be constructed within the 100-year floodplain. If trails were constructed within the floodplain, this could be considered a long-term impact, as it would decrease the infiltration area available for stream energy dissipation during a flood event area and potential infiltration/velocity reduction of runoff entering the stream. Also, construction of trails within the floodplain could impact stream meandering.*

**4. DECIDUOUS FOREST**

Text: pg. 176 “Reconstruction of 2.5 miles of existing trails from about 6 ft. wide to a width of 9 ft. where possible and the net construction of 500 ft. of new, 8-foot wide foot/horse trail. This latter action would involve the construction of 3,500 ft. of new trail and the restoration of 3,000 ft. of former trail.”

“As much as 4 to 5 additional acres could be disturbed by trail rehabilitation. Following completion of trail work, this construction zone would promptly be planted with native grasses to stabilize the soils and then be allowed to revegetate naturally with native woodland species.”

*The amount of trail that is to be reconstructed vs. newly constructed is confusing. In the summary document, under Alts. A, C & D, upgrading of 9.8 miles of trail is mentioned. However, in this text, only around 3 miles of trail is specifically mentioned. Would the other trails not be in forested areas? Where are the impacts from these trails mentioned? Also, how is it a net of 500 ft. of new trail when the following sentence says 3,500 ft. of new trail?*

*What type of material would be used on the foot/horse trail? BEQ would recommend that these trails be non-paved. For trails that are to be upgraded or relocated, the BEQ would also recommend that porous asphalt or other alternatives to traditional asphalt pavement be utilized.*

*Does the 4-5 acres refer to the area needed to rehabilitate the 3 miles of trail or other trail located elsewhere? Would monitoring occur to ensure areas become revegetated with native species? There is likely a non-native seed source within the park. BEQ would recommend replanting these areas with native tree species to prevent non-native regeneration and also monitoring of the site to ensure reforestation.*

Text: pg. 177 “The effects on the riparian deciduous zone could include the following. The effect would be beneficial in the long-term, but the impact intensity would depend on the aggregate acreages of all of these actions:

-Within riparian zones, restoration would be implemented to correct problem areas.

This would supplement the regenerating capabilities in this zone.

-Existing trails in the riparian zone may be relocated outside of the riparian zone.

After stabilization with native grasses, riparian vegetation would be re-established along the former alignment either naturally or with the assistance of plantings. This would be a beneficial, long-term effect.”

*What are the riparian zone dimensions, what would constitute a trail being within a riparian zone and what would be criteria for relocation? Also, how much of the 9.8 miles of trail is found within the riparian zone? Figures should be provided for the riparian trail as they were for the upland trails. BEQ recommends relocation of trails from riparian zones (a 50-foot buffer on each side of stream).*

In general, the document does not make use of updated information. For example, the findings of the document entitled “Water Quality, Sediment Quality and Stream-Channel Classification of Rock Creek, Washington, D.C. 1999-2000”, prepared by the U.S. Geological Survey, in cooperation with the National Park Service, has not been used. In addition, the D.C. 305(b) report used is dated 1996 while 1998, 2000 and 2002 reports are available.

## 5. NATURAL RESOURCE MANAGEMENT

Page 17 - Under the kind of actions the National Park Service (NPS) will undertake is coordination. Agencies that the NPS coordinates with to improve water quality are listed. This list should include the D.C. Department of Health. The Water Quality Division coordinates with the National Park Service to resolve illicit discharges to Rock Creek and its tributaries.

Page 19 - Replace

“Support initiatives by the U.S. Environmental Protection Agency, State of Maryland, and local governments, including the District of Columbia and Montgomery County, that ...”

by  
“Support initiatives by the U.S. Environmental Protection Agency, State of Maryland, the District of Columbia, and local governments, including Montgomery County, that ...”

### Alternatives

#### **Alternative A**

##### **U.S. Park Police substation**

Page 76 - Proposed BMPs should be implemented for mitigation of bacteria runoff.

#### **Edgewater**

Page 76 - Specify pollutant as “bacteria runoff”.

#### **Alternative B**

##### **Edgewater**

Page 85 - Proposed BMPs should be implemented for mitigation of bacteria runoff.

#### **Alternative C**

Page 94 - Proposed BMPs at Edgewater should be implemented for mitigation of bacteria runoff.

#### **Alternative D**

Page 103 - Proposed BMPs at Edgewater should be implemented for mitigation of bacteria runoff.

Page 119 - Last paragraph

The last sentence indicates sources of high bacteria concentration in upper Rock Creek. Recent bacteria source tracking investigation (ongoing D.C. Department of Health study) has shown elevated bacteria levels from ‘livestock’ immediately downstream the stable facilities. Include horse stables as sources. Include this source also on page 123 in list of point and nonpoint sources of water pollution.

Page 120 - Second paragraph

The volume of combined sewer overflow is incorrectly stated as being 42.5 million gallons during a 1 hour storm. It is 49 million gallons per average year.

Last paragraph

Replace “The District of Columbia Water Resources Management Division ...” by “The District of Columbia, Department of Health ...”

### **Appendix B**

#### **Laws and Executive Orders**

**Other Laws**

Under Natural Resources, include the "District of Columbia Water Pollution Control Act, D.C. Law 5-188; D.C. Official Code §§ 8-103.



MARYLAND DEPARTMENT OF THE ENVIRONMENT  
1800 Washington Boulevard o Baltimore Maryland 21230-1718  
(410) 537-4120

Robert L. Ehrlich, Jr.  
Governor

Lynn Y. Buhl  
Acting Secretary

May 5, 2003

Superintendent Adrienne A. Coleman  
Rock Creek Park  
3545 Williamsburg Lane, NW  
Washington DC 20008

RE: MDE Identifier: ES20030403-0017  
Project: Rock Creek Park and the Rock Creek and Potomac Parkway

Dear Superintendent Coleman:

Thank you for providing the Maryland Department of the Environment (MDE) with the opportunity to comment on the above-referenced project. Copies of the documents were circulated throughout MDE for review, and it has been determined that this project is consistent with MDE's plans, programs and objectives.

Again, thank you for giving MDE the opportunity to review this project. If you have any questions or need additional information, please feel free to call me at (410) 537-4120.

Sincerely,

Joane D. Mueller  
MDE Clearinghouse Coordinator  
Technical and Regulatory Services Administration

BY: MAY 06 2003

ROCR 2861  
Page 1 of 4ROCR 2861  
Page 2 of 4

Robert L. Ehrlich, Jr.  
Governor  
Michael S. Steele  
Lt. Governor

Andrey E. Scott  
Secretary  
Florence E. Baria  
Deputy Secretary

July 15, 2003

Ms. Adrienne Coleman  
Superintendent, National Park Service  
U.S. Department of the Interior  
3545 Williamsburg Lane, NW  
Washington, DC 20008-1207

**STATE CLEARINGHOUSE RECOMMENDATION****State Application Identifier:** MD20030331-0273**Applicant:** U.S. Department of the Interior and the National Park Service**Project Description:** Environmental Impact Statement: Draft General Management Plan, Rock Creek Park and the Rock Creek and Potomac Parkway: consider 4 alternatives including "no action"**Project Location:** Montgomery County and the District of Columbia**Approving Authority:** U.S. Department of the Interior**Recommendation:** Consistent with Qualifying Comments

Dear Ms. Coleman:

In accordance with Presidential Executive Order 12372 and Code of Maryland Regulation 14.24.04, the State Clearinghouse has coordinated the intergovernmental review of the referenced project. This letter, with attachments, constitutes the State process review and recommendation. This recommendation is valid for a period of three years from the date of this letter.

Review comments were requested from the Maryland Departments of State Police, Natural Resources, Transportation, the Environment, Montgomery County, the Maryland-National Capital Park and Planning Commission in Montgomery County, and the Maryland Department of Planning. The Maryland-National Capital Park and Planning Commission in Montgomery County had no comments.

The Maryland Departments of Natural Resources, State Police, Transportation, and the Environment; and the Maryland Department of Planning found this project to be consistent with their plans, programs, and objectives. The Maryland Department of Transportation favored the "Continue Current Management" (no action alternative). See the attached memorandum.

Montgomery County found this project to be generally consistent with their plans, programs, and objectives, but included certain qualifying comments that requested certain actions if the mid-day road closure is part of the proposed facility changes. The County seeks the Applicant to mitigate against any transportation impacts that may result in neighborhoods located in Southern Montgomery County. See the attached response form.

301 West Preston Street • Suite 1101 • Baltimore, Maryland 21201-2305  
Telephone: 410.767.4500 • Fax: 410.767.4180 • Toll Free: 1.877.767.6272 • TTY Users: Maryland Relay  
Internet: [www.MDP.state.md.us](http://www.MDP.state.md.us)

Ms. Adrienne Coleman  
July 15, 2003  
Page 2

Any statement of consideration given to the comments(s) should be submitted to the approving authority, with a copy to the State Clearinghouse. The State Application Identifier Number must be placed on any correspondence pertaining to this project. The State Clearinghouse must be kept informed if the approving authority cannot accommodate the recommendation.

Please remember, you must comply with all applicable state and local laws and regulations. If you need assistance or have questions, contact the State Clearinghouse staff person noted above at 410-767-4490 or through e-mail at [brosenbush@mdp.state.md.us](mailto:brosenbush@mdp.state.md.us). **Also please complete the attached form and return it to the State Clearinghouse as soon as the status of the project is known. Any substitutions of this form must include the State Application Identifier Number. This will ensure that our files are complete.**

Thank you for your cooperation with the MIRC process.

Sincerely,

Linda C. Janey, J.D., Director  
Maryland State Clearinghouse  
for Intergovernmental Assistance

LCJ:BR

Enclosure(s)

cc: Jorge Valladares - MNCPPCM  
Leigh Maddox - MDSP  
Ray Dintaman - DNR

Ronald Spalding - MDOT  
Joane Mueller - MDE

Lisa Rother - MTGM

03-0273.CLS.doc



Robert L. Ehrlich, Jr.  
Governor  
Michael S. Steel  
Lt. Governor

Audrey E. Scott  
Secretary  
Florence E. Burian  
Deputy Secretary

**PROJECT STATUS FORM**

Please complete this form and return it to the State Clearinghouse upon receipt of notification that the project has been approved or not approved by the approving authority.

**TO:** Maryland State Clearinghouse  
Maryland Department of Planning  
301 West Preston Street  
Room 1104  
Baltimore, MD 21201-2305

**DATE:** \_\_\_\_\_  
(Please fill in the date form completed)

**FROM:** \_\_\_\_\_  
(Name of person completing this form.)

**PHONE:** \_\_\_\_\_  
(Area Code & Phone number)

**RE:** State Application Identifier: MD20030331-0273  
Project Description: Environmental Impact Statement: Draft General Management Plan, Rock Creek Park and the Rock Creek and Potomac Parkway: consider 4 alternatives including "no action"

PROJECT APPROVAL	
This project/plan was:	<input type="checkbox"/> Approved <input type="checkbox"/> Approved with Modification <input type="checkbox"/> Disapproved
Name of Approving Authority:	Date Approved:

FUNDING APPROVAL	
The funding (if applicable) has been approved for the period of:	
_____, 200__ to _____, 200__ as follows:	
Federal \$:	Local \$:
State \$:	Other \$:

OTHER	
<input type="checkbox"/>	Further comment or explanation is attached

MDPCH-1F  
301 West Preston Street • Suite 1104 • Baltimore, Maryland 21201-2305  
Telephone: 410-767-4500 • Fax: 410-767-4480 • Toll Free: 1-877-767-6272 • TTY: User: Maryland Relay  
Internet: www.MDP.state.md.us

Please Complete Your Review & Recommendation Before May 1, 2003

Return Completed Form To: Linda C. Janey, J.D., Manager, Maryland State Clearinghouse for Intergovernmental Assistance,  
Maryland Department of Planning, 301 West Preston Street, Room 1104, Baltimore, MD 21201-2305  
Phone: 410-767-4490 Fax: 410-767-4480

State Application Identifier: MD20030331-0273 Clearinghouse Contact: Bob Rosenbush, 410-767-4490  
brosenbush@mdp.state.md.us

Location: Montgomery County and the District of Columbia  
Applicant: U.S. Department of the Interior and National Park Service

Description: Environmental Impact Statement: Draft General Management Plan, Rock Creek Park and the Rock Creek and Potomac Parkway: consider 4 alternatives including "no action"

Based on a Review of the Information Provided, We Have Checked (x) the Appropriate Determination Below	
CONSISTENT RESPONSES - (For Use By STATE AGENCIES Only)	
C1	It is <b>Consistent</b> with our plans, programs, and objectives
C2	It is <b>Consistent</b> with the policies contained in Executive Order 01.01.1992.27 (Maryland Economic Growth, Resource Protection, and Planning Act of 1992), Executive Order 01.01.1998.04 (Smart Growth and Neighborhood Conservation Policy), and our plans, programs, and objectives.
C3	(MHT ONLY) It has been determined that the project will have "no effect" on historic properties and that the federal and/or State historic preservation requirements have been met.
C4	(DNR ONLY) It has been determined that this project is in the Coastal Zone and is not inconsistent with the Maryland Coastal Zone Management Program.
C7	(MDP ONLY) It is consistent with the requirements of State Finance and Procurement Article 5-7B-02; 03; 04 and 05 Smart Growth and Neighborhood Conservation (Priority Funding Areas).
CONSISTENT RESPONSES - (For Use By COUNTY & LOCAL AGENCIES Only)	
C5	It is <b>Consistent</b> with our plans, programs, and objectives.
C6	It is <b>Consistent</b> with the Economic Growth, Resource Protection, and Planning Visions (Planning Act of 1992), State Finance and Procurement Article 5-7B - Smart Growth and Neighborhood Conservation (Priority Funding Areas), and our plans, programs, and objectives.
OTHER RESPONSES - (For Use By ALL)	
R1	<b>GENERALLY CONSISTENT WITH QUALIFYING COMMENTS:</b> It is generally <b>Consistent</b> with our plans, programs and objectives, but the attached qualifying comment is submitted for consideration.
R2	<b>CONTINGENT UPON CERTAIN ACTIONS:</b> It is generally <b>Consistent</b> with our plans, programs and objectives contingent upon certain actions being taken as noted in the attached comment(s).
R3	<b>NOT CONSISTENT:</b> It raises problems concerning compatibility with our plans, programs, objectives, or Planning Act visions/policies; or it may duplicate existing program activities, as indicated in the attached comment(s). If a meeting with the applicant is requested, please check here: <input type="checkbox"/>
R4	<b>ADDITIONAL INFORMATION REQUESTED:</b> Additional information is required to complete the review. The information needed is identified below. If an extension of the review period is requested, please check here: <input type="checkbox"/>
R5	<b>FURTHER INTEREST:</b> Due to further interest/questions concerning this project, we request that the Clearinghouse set up a conference with the applicant.
R6	<b>SUPPORTS:</b> Supports "Smart Growth" and Federal Executive Order 12072 (Federal Space Management), which directs federal agencies to locate facilities in urban areas.

Attach additional comments if necessary OR use these spaces: *The area covered by this plan is entirely within the District of Columbia so we have no comment. However, we ask the National Park Service to mitigate any transportation impacts that may result in neighborhoods in southern Montgomery County.*

Name: Lisa W. Rother Signature: Lisa W. Rother as a result of the midday road closure.

Organization: Mont. Co. Executive Office Phone: (240) 777-2543

Address: 100 Hayward Ave. 4th Floor Date Completed: \_\_\_\_\_  
Rockville, MD 20850

Check here if comments are attached.

MDPCH-1A

ROCR 2983  
Page 1 of 2

ROCR 2983  
Page 2 of 2



**Maryland Department of Transportation**  
The Secretary's Office

Robert L. Ehrlich, Jr.  
Governor  
Michael S. Steele  
Lt. Governor  
Robert L. Flanagan  
Secretary  
Trent M. Kittiman  
Deputy Secretary

April 29, 2003

Superintendent  
Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008-1207

RE: Rock Creek Park Draft General Management Plan Environmental Impact Statement

Dear Sir or Madam:

The Maryland State Highway Administration (SHA) has prepared the enclosed comments on this document, and we are submitting them for your consideration. SHA does not anticipate any impacts to State roads.

Thank you for providing the Maryland Department of Transportation the opportunity to comment on the above referenced EIS.

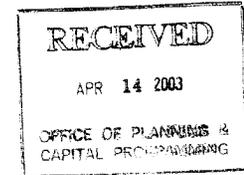
Sincerely,

Ronald N. Spalding  
Manager, Regional Planning and Programming  
Office of Planning & Capital Programming

Enclosure

cc: Mr. Michael J.Haley, Assistant Division Chief of Regional and Intermodal Planning  
Mr. Douglas H. Simmons, Director of Planning and Preliminary Engineering  
Mr. Glen Smith, Regional Planner, Regional and Intermodal Planning  
Mr. Charlie Watkins, District Engineer

My telephone number is 410-  
Toll Free Number 1-888-713-1414, TTY User Call Via MD Relay  
7201 Corporate Center Drive, Hanover, Maryland 21076



**MEMORANDUM**

**To:** Mr. Ronald Spalding, Manager  
Office of Planning and Capital Programming  
**From:** Dennis N. Simpson, Chief *D.N.S.*  
Regional and Intermodal Planning  
**Date:** April 11, 2003  
**Subject:** Rock Creek Park Draft General Management Plan Environmental Impact Statement

The Regional and Intermodal Planning Division concurs with Alternative B which is the *Continue Current* Management or no action alternative. This alternative will have the least impact to our State road system in the immediate vicinity. Although some of the National Park Service's proposals may significantly impact commuters and Washington, DC streets, we do not anticipate any impacts to State roads. MD 410 (East-West Highway) intersects Beach Drive and is the closest State road to the affected area. The average daily traffic (ADT) for MD 410 near Beach Drive is 31,600 vehicles per day (VPD). The ADT on Beach Drive is approximately 5400 VPD at the State line which is one mile south of MD 410.

If you have any questions or concerns, please do not hesitate to contact Mr. Glen Smith, our Regional Planner for Montgomery County. Glen may be reached at (410)545-5675 or [gsmith2@sha.state.md.us](mailto:gsmith2@sha.state.md.us). He will be happy to assist you.

cc: Mr. Michael J. Haley, Assistant Division Chief of Regional and Intermodal Planning  
Mr. Douglas H. Simmons, Director of Planning and Preliminary Engineering  
Mr. Glen Smith, Regional Planner, Regional and Intermodal Planning  
Mr. Charlie Watkins, District Engineer



410-545-5675 or 1-888-204-4828

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GEOFFREY B. BIDDLE  
*Village Manager*  
DAVID R. PODOLSKY  
*Legal Counsel*

CHEVY CHASE VILLAGE  
5906 CONNECTICUT AVENUE  
CHEVY CHASE, MD 20815  
Telephone (301) 654-7300  
ccv@montgomerycountymd.gov

June 6, 2003

Ms. Adrienne Coleman  
Superintendent, Rock Creek Park  
U.S. National Park Service  
3545 Williamsburg Lane, NW  
Washington, D.C. 20008-1207

Dear Ms. Coleman:

This letter is in response to the National Park Service's proposal to restrict vehicular traffic on portions of Beach Drive during weekday non-rush hour periods. Connecticut Avenue and Brookville Road are two of the four alternate proposed traffic arteries that would carry spillover traffic currently accommodated by Beach Drive. These roadways run directly through Chevy Chase Village. Chevy Chase Village is opposed to the restriction as currently proposed.

The additional traffic traveling on these presently overburdened thoroughfares would have a significant negative impact on the Village's residential neighborhoods. That impact would be measurable in terms of increased congestion and reduced pedestrian safety – especially for our children. As a community, we oppose this and any other initiative that would arbitrarily increase traffic volume and/or reduce the safety of our residents.

Please let me know if there is any additional input we may make to prevent this proposal from being implemented.

Yours truly,



Geoffrey B. Biddle  
Manager, Chevy Chase Village

- cc: Ms. Mary Rowse, Chevy Chase Citizens Association
- Mr. Bill Rice, Public Information Officer, D.C. Department of Transportation
- Mr. Dan Tangherlini, Director, D.C. Department of Transportation
- Mayor Anthony Williams
- Mr. Terry Carlstrom, Director, National Capital Region, National Park Service
- Ms. Fran Mainella, Director, Department of the Interior
- Mr. Tim Letzkus, 16<sup>th</sup> Street Heights Civic Association

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JUN 6 4 2003



**MONTGOMERY COUNTY COUNCIL**  
ROCKVILLE, MARYLAND

OFFICE OF THE COUNCIL PRESIDENT

July 10, 2003

Adrienne A. Coleman, Superintendent  
Rock Creek Park  
3545 Williamsburg Lane, NW  
Washington, DC 20008

Dear Ms. Coleman:

After a review of the Draft General Management Plan for Rock Creek Park by both the Transportation and Environment (T&E) Committee and the full body, the Montgomery County Council adopted a resolution (attached) supporting the current traffic management plan on Beach Drive and requests that the National Park Service not change the plan. We believe that closing Beach Drive at any time on weekdays will add to the significant traffic congestion on 16<sup>th</sup> Street, Connecticut Avenue, and other north-south routes, as well as exacerbate the cut-through traffic problem on neighborhood streets.

We appreciate the Park Service offering us the opportunity to comment, and we are especially thankful to you for your coming to brief the T&E Committee on June 26.

Sincerely,



Michael L. Subin  
Council President

MLS:go

- Copy: The Honorable Paul Sarbanes, United States Senate
- The Honorable Barbara Mikulski, United States Senate
- The Honorable Albert Wynn, U.S. House of Representatives
- The Honorable Christopher Van Hollen, U.S. House of Representatives
- The Honorable Steny Hoyer, U.S. House of Representatives
- The Honorable Eleanor Holmes Norton, U.S. House of Representatives
- The Honorable Linda Cropp, Chair, Council of the District of Columbia
- The Honorable Ida Ruben, Chair, Montgomery County Senate Delegation
- The Honorable Charles Barkley, Chair, Montgomery County House Delegation
- The Honorable Douglas Duncan, Montgomery County Executive
- The Honorable Anthony Williams, Mayor, Washington, District of Columbia
- Derick Berlage, Chair, Montgomery County Planning Board

STELLA B. WERNER COUNCIL OFFICE BUILDING, 100 MARYLAND AVENUE, ROCKVILLE, MARYLAND 20850  
240/777-7900 TTY 240/777-7914 FAX 240/777-7989  
WWW.CO.MG.MD.US/COUNCIL



Resolution No.: 15-264  
Introduced: July 1, 2003  
Adopted: July 8, 2003

COUNTY COUNCIL  
FOR MONTGOMERY COUNTY, MARYLAND

By: Councilmembers Nancy Floreen and Howard Denis

Subject: Council Support for Maintaining the Existing Traffic Management Pattern on Beach Drive in Rock Creek Park

Background

1. The National Park Service is developing a General Management Plan (GMP) for Rock Creek Park. The Park Service Superintendent for Rock Creek Park briefed the Transportation and Environment Committee of the Council on June 26, 2003. The deadline for public comment on the Draft GMP is July 15, 2003.
2. There are many recommendations within the Plan for improving park facilities and adjusting operations. However, one primary issue in the GMP is of concern to Montgomery County, the proposal to change traffic patterns on Beach Drive. There are four alternatives, which include recommendations such as imposing HOV restrictions, closing Beach Drive from 9:30 am to 3:30 pm on weekdays, closing sections of Beach Drive permanently to vehicular traffic, or maintaining the status quo.
3. Use and appreciation of the park should be available to everyone. Significant parts of Beach Drive are already closed on weekends to improve and increase recreational opportunities in Rock Creek Park. Mid-weekday is often the only time people whose limited mobility requires vehicular access to the park, such as seniors, handicapped individuals, parents with young children, or tourists can drive through Rock Creek Park for enjoyment. Proposals restricting weekday driving on Beach Drive, often the only time many individuals can enjoy the park, are inherently unfair to a large number of our residents.
4. Montgomery County is encouraging commuters and other drivers to travel in off-peak hours when roads are less congested. Closing Beach Drive at 9:30 am would discourage those who can travel during this later hour.
5. Traffic counts indicate that a higher proportion of cars use neighborhood streets when Beach Drive is closed. Restricting vehicular traffic on Beach Drive during the work week will divert large numbers of cars, overburdening adjacent residential streets and other north-south roadways.

6. The Council of the District of Columbia passed a resolution on June 3, 2003 opposing changes to the traffic management plan for Beach Drive. In addition, Congressman Chris Van Hollen wrote a letter on June 23, 2003 to the Superintendent of Rock Creek Park expressing strong opposition to any changes in current traffic patterns on Beach Drive.

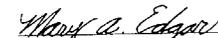
Action

The County Council for Montgomery County, Maryland approves the following resolution:

The Montgomery County Council supports the current traffic management plan on Beach Drive in Rock Creek Park and requests that the National Park Service not change it. The Council supports and agrees with the Resolution from the Council of the District of Columbia and the letter from Congressman Van Hollen.

This Resolution will be forwarded to the National Park Service and the Superintendent of Rock Creek Park before July 15, 2003.

This is a correct copy of Council action.

  
Mary A. Edgar, CMC  
Clerk of the Council

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Page 1 of 1

ROCR 2984  
Page 1 of 1



OFFICE OF THE COUNTY EXECUTIVE  
ROCKVILLE, MARYLAND 20850

Douglas M. Duncan  
County Executive

July 8, 2003

Adrienne A. Coleman, Superintendent  
Rock Creek Park  
3545 Williamsburg Lane, NW  
Washington, DC 20008

Dear Ms. Coleman:

I am writing to provide comments on the National Park Service's Draft General Management Plan/Environmental Impact Statement for Rock Creek Park. My comments are limited to the transportation scenarios of the plan, as the final decision on that element will directly impact residents of Montgomery County.

Given the potential impacts of certain alternatives, I recommend Alternative B. I do not support the Park Service's preferred Alternative D for the future management of the park. I believe this alternative, while improving recreational opportunities for park visitors, would negatively impact certain Montgomery County neighborhoods, such as Rollingwood, by increasing the volume of traffic on their residential streets. These neighborhoods already experience 'cut-through' traffic effects when Beach Drive is closed on weekends. Motorists attempt to access Beach Drive from the north, only to find it closed, and then use the local neighborhood streets that are not intended for through traffic to reach alternative routes to Military Road and other park accesses. This problem would be exacerbated by any alternative that adds to the closures of Beach Drive. Excessive non-local traffic on local residential streets is a significant detriment to the livability of any neighborhood, and in Montgomery County we strive to preclude such problems wherever possible.

Thank you for allowing me the opportunity to comment on the plan.

Sincerely,

Douglas M. Duncan  
County Executive

DMD/tj



*U.S. 19 Council Member  
Health & Safety*

*Leann Pfister Council Member  
Budget & Finance*

*Kitty J. Radabaugh Mayor*

*Glenn Casani Council Member  
Infrastructure*

*Barbara Scherman Council Member  
Parks & Trees*

Action

The Town Council of Kensington, MD approved the following resolution:

The Town of Kensington Council supports the current traffic management plan on Beach Drive in Rock Creek Park. The Council supports Alternative B as proposed by the Council of the District of Columbia.

This Action was taken at the Town Council meeting of July 7, 2003 and will be forwarded to the National Park Service and the superintendent of Rock Creek Park before July 15, 2003.

ROCR 1803  
Page 1 of 1

ROCR 2973  
Page 1 of 1

To: Patrick\_Gregerson@nps.gov  
cc:  
Subject: Rock Creek Newsletter 1  
07/07/2003 12:53 PM AST  
Please respond to ticed

Name: Alexandra and Donald Tice (Council Chairman, VMA)

Address:  
City, State/Province: Chevy Chase, MD  
Country: USA  
Postal Code: 20815

We wish to address the the Park Service's plan to close portions of Beach Drive adjacent to Chevy Chase from 9:30 a.m. to 3:30 p.m. on weekdays. The proposed plan would divert traffic from Beach Drive through our neighborhood streets onto Brooikville Road, Connecticut Avenue, and the narrow residential streets which run between Rollingwood and the VMA, Estimates run as high as 3,000 to 4,000 diverted vehicles per day, which would be devastating to the safety and tranquility of small residential area such as Martin's Additions. The village of Martin's Additions to Chevy Chase joins several other community bodies and leaders, including the Rollingwood Citizens Association, the Village of Chevy Chase, Congressman Van Hollen, Mayor Williams, the D.C. Council and the ANC Assembly of the Disrict of Columbia in opposing this proposal. We ask that you drop this proposal before you cause unnecessary and broad damage to to thje safety and well-being of thousands of residents of areas adjacent to the park in order to accommodate a small minority of people with limited special interests in seeing this proposal go forward.  
Donald C. Tice  
Council Chairman  
Village of Martin's Additions po Chevy chase.



VILLAGE OF MARTIN'S ADDITIONS  
P.O. Box 15267 • Chevy Chase, Maryland 20825 • 301/656-4112

Office of the  
Village Council

July 14, 2003

National Park Service, Rock Creek Park  
Superintendent Adrienne Coleman  
3545 Williamsburg Lane, NW  
Washington, D.C. 20008-1207

Dear Superintendent Coleman:

On behalf of the Village of Martin's Additions, I am writing with regard to the draft General Management Plan for Rock Creek Park and in particular, the Park Service's preferred Alternative D. The Village of Martin's Additions is an incorporated municipality with 320 households, including portions of Brookville Road, Thornapple Street, Shepherd Street, and Cummings Lane in Chevy Chase, Maryland.

At its June 2003 meeting, the elected Council of the Village of Martin's Additions voted unanimously to oppose any alternatives identified by NPS that would entail new closures of Beach Drive, including Alternative D. Under Alternative D, traffic will be diverted from Beach Drive though the Rollingwood and Chevy Chase, DC areas onto Brookville Road and the other Village Streets noted above. Contrary to the Park Service's analysis, this would cause a significant change in our quiet neighborhood character and would impose a substantial detriment to our community in exchange for what we view as minimal recreation benefits to the public.

We appreciate your careful consideration of the interests of our community exemplified by vote of the Village of Martin's Additions Council.

Sincerely,  
  
Ken Brotman  
Council Member

**Appendix B**

**Business  
Comment Letters**

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**Appendix B  
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3016 Tilden Street NW, Inc.

July 10, 2003

Superintendent  
Rock Creek Park  
3545 Williamsburg Lane NW  
Washington, DC 20008

Dear Sir or Madam:

I am writing on behalf of 3016 Tilden Street NW, Inc., a cooperative building located near Rock Creek Park. The Board of Directors discussed the "Rock Creek Park and the Rock Creek and Potomac Parkway Draft General Management Plan and Environmental Impact Statement". Our comments follow:

- We applaud the US Park Service for the detailed study and the process which has incorporated public input and discussion at various points during the past several years of the project
- We do not support Alternative B, No Action.
- We do not support Alternative C, Non-motorized Recreation Emphasis. We strongly support the concept of the park as a recreational and learning site. At the same time, the realities of the area's growth, both in terms of people and automobiles, requires that Rock Creek Parkway continue to be used for automobile traffic.
- We do not support Alternative D, Mid-Weekday Recreation Enhancement. Closing the parkway to automobile traffic during mid-day would result in more congestion in both local neighborhoods near the park and on main thoroughfares such as Connecticut Avenue. These areas already have been impacted by the area's growth and further automobile traffic during the mid-day seems undesirable from the point of view of safety and community life.
- We support Alternative A, Improved Management of Established Park Uses. This alternative adds improvements to enhance the facilities, to improve the educational experience of recreational visitors, and to enhance the cultural aspects of the park. This alternative also includes some welcome measures to slow traffic speed. We have no strong view on the portion of this Alternative that would implement HOV restrictions on Beach Drive during rush hour, but wonder whether this would force more automobiles into nearby neighborhoods, as discussed as a negative feature of Alternative D above. We note the cost of this alternative and believe it would be a wise investment for the future.

Thank you for the opportunity to comment.

Regards,



Polly A. Penhale  
President of the Board  
3016 Tilden Street NW, Inc.  
Washington, DC 20008

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Page 1 of 1

ROCR 0914  
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"Elliott Milstein"

To: <dccouncilmembers@dccouncil.us>, <mayor@dc.gov>, <elliott@wcl.american.edu <ROCR\_superintendent@nps.gov>, > <Councilmember.Denis@montgomerycountymd.gov>, <douglas.duncan@co.mo.md.us>, <chris.vanhollen@mail.house.gov 06/27/2003 11:38 AM AST  
Subject: Keep Beach Drive Alive! Support Alternative B

I write in Support of Alternative B regarding Beach Drive and to urge your opposition to the other possibilities. Changing the status quo will have a negative effect on the lives of many people and the benefits of change will inure to relatively few.

It is a terrible idea to prevent automobiles from using Beach Drive. Even in non-rush hours traffic on both Connecticut Ave and 16th Street, the arterial alternatives to Beach Drive, is clogged much of the time. Eliminating the Beach Drive route will make matters on those streets much worse.

In addition, closing Beach Drive will siphon a lot of traffic into the Rollingwood neighborhood of Chevy Chase. As a resident of that neighborhood, I stand with my neighbors in opposition to the closing of the park.

Driving a car through the park is a time-honored way of enjoying its beauty. The park is full of paths and walkways for bikers and hikers. Indeed, I am one of the people who enjoy both biking and walking through the park. The existing rules adequately balance the multiple ways that people can and do use the park. Perhaps constructing a more effective bike lane is possible for those who want it.

Please do whatever you can to defeat the proposed change.

Elliott S. Milstein  
Professor of Law  
American University, Washington College of Law  
4801 Massachusetts Ave., N.W.  
Washington, DC 20016

Jorge Costa <  
To: "rocr\_superintendent@nps.gov"  
<rocr\_superintendent@nps.gov>

04/02/2003 07:15 AM PST  
Subject: closing of beach drive during weekdays

Dear Sir:

As I resident of Chevy Chase, DC. I wanted to let you know my feelings regarding the proposed plan to close traffic on Beach Dr. on weekdays. My position is the following. If the closure strategy is be the same as is done on weekends I think it is a positive move. Access to North and South is still maintained by the sections that are left open.

Taking 27th to Broad Branch can still get you to downtown by the parkway.

There are so many roads in this city. Why cant we have at least on safe place where our children can be without fear of being struck by a car.

Regards

Jorge Costa

Account Manager, Ariba, Inc.

ROCR 0457  
Page 1 of 1

"Bike the Sites, Inc." info@bikethesites.com  
To: <rocr\_superintendent@nps.gov>  
Subject: Bike the Sites Washington, DC

07/12/2003 05:42  
PM AST  
Please respond to  
"Bike the Sites,  
Inc."

To who this may concern,

I am the Operations Manager at Bike the Sites located in the Old Post Office Pavilion downtown. On a personal level, I am very interested in seeing Rock Creek become even more bicycle friendly. Through our business, my fellow employees and I lead guided tours through many areas of the Washington region, but would love to have better access to such a urban park gem. In addition to leading tours, our customers can rent and frequently ask about good biking opportunities. It would be a boon to a local District based business such as us. It would be great for a biking enthusiast such as myself who has just purchased my first home east of Rock Creek Park to have a car-free environment. I hope that my co-workers contact you with equal conviction on closing the park to motor vehicles during the weekday like on the weekends. Sincerely,

Mark Farrell Operations Manager  
[www.bikethesites.com](http://www.bikethesites.com)

ROCR 0879  
Page 1 of 1

"Mitchell Arthur" <mitchell\_arthur@  
To: <rocr\_superintendent@nps.gov>,  
bah.com> <rocr\_gmp@nps.gov>, <mayor@dc.gov>,  
<dccouncil@washington.dc.us>, <jon.bouker@mail.house.gov>  
03/28/2003 05:48 PM EST

Subject: Rock Creek Park Initiative to limit vehicle traffic during weekdays.

Bravo! It is nice to see Politicians and Government officials take a stand and fight for what is right and flies in the face of often wrong conventional wisdom. Rock Creek Park has become a de facto highway for vehicles who simply use it to short cut Connecticut Avenue and rarely use it to appreciate the natural beauty it has to offer. The park should first and foremost be a PARK, not a highway.

Your decision is one based on sound usage policy and fair accommodation to all. I applaud your efforts and hope you will make the change permanent. I am an active user of the park on weekdays and weekends. It will be nice to have a few sections of car free solitude during the weekday hours.

Keep up the excellent work.  
Arthur D Mitchell  
Senior Associate  
Booz Allen Hamilton

ROCR 3118  
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ROCR 0356  
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MR. JAMES: Thank you. My name is David James, J-A-M-E-S. I live in Alexandria. I am a geophysicist with the Carnegie Institution. I am a daily bicycle commuter from Alexandria. I ride up Rock Creek Parkway from Memorial Bridge, north on the final stretch on Broad Branch Road. I have been riding, I've been running and I've been commuting at Rock Creek for more than 35 years. While I fully endorse the management plans that call for daily closures of sections of Beach Drive, I want us and you to not lose sight of a massive problem for cyclists and other recreational users in the park. Specifically the multi-use paths, particularly south of Pierce Mill have been deteriorating for decades. Many sections are now narrow, they're potholed, broken by invading roots and covered with mud. These bike paths are not only a disgrace to the park and to the city, they're positively dangerous. They are far below national standards. If these deteriorating multiuse paths are not improved as part of this plan, or whatever plan emerges, there will be a growing movement among cyclists particularly to ride exclusively on the road. This can already be seen on the roads even where they're running to parallel to trails. I urge the Park Service to rebuild—I mean completely rebuild, not patch, those critically neglected paths before they're abandoned by increasing numbers of cyclists. This must be done regardless of how road closure decisions are finally reached. I would comment in concluding that there has been a lot of glib talk about access provided by existing bike paths. What paths we do have are increasingly unsafe, even unserviceable. I have seen very little evidence over the past 3 decades that the National Park Service has any serious interest in maintaining multiuse paths at anything resembling federal standards. This remains a first order and entirely unresolved problem. For this new management it should be a top priority. I suggest that each of you, the 3 up there and others in the Park Service, take a morning or an afternoon on a weekend and walk from Pierce Mill south all the way to the Kennedy Center and take a look at that path. It's a disgrace. Finally, Beach Drive was closed for several months some years ago when the tunnel near the zoo was retiled and the sky did not fall.

"Edward H. Asher" <EHA@cclandco.com  
To: "ROCR\_superintendent@nps.gov"  
<ROCR\_superintendent@nps.gov>  
cc: "Richard Parsons (E-mail)" RParsons@montgomery-chamber.com  
07/15/2003 10:48 AM AST  
Subject: DO NOT CLOSE ROCK CREEK PARK

As the President of The Chevy Chase Land Company of Montgomery County, Maryland, I take great exception to the proposal to close Rock Creek Park to traffic as has been proposed. The founder of our company, Senator Francis Newlands, was one of the authors of the bill to create Rock Creek Park, and envisioned the park to be enjoyed by people in cars, walking, etc. The intent of the bill was not to ever close the Park to vehicular traffic. Additionally, the tenants of our many office buildings in Montgomery County count on Beach Drive to travel to daytime meetings downtown, many of which occur in the middle of the day. Please do not close this mode of transportation to those who must use their cars to access downtown during the day. Lastly, the disabled can only enjoy this scenic route by car...many cannot walk. Thank you for not acting to close the Park to vehicular traffic. <<Edward Hall Asher.vcf>> (See attached file: Edward Hall Asher.vcf)

ROCR 3071  
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ROCR 0477  
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MR. MCCORMICK: Hello, my name is Charlie McCormick. I own City Bikes in Adams Morgan. I just wanted to speak for a couple of minutes about the park and how much I enjoy using it. For experienced cyclists, the park is pretty accessible on weekdays. But for inexperienced cyclists, there's a real barrier there with the cars. I'm used to it now, so it doesn't bother me as much. But for people starting out - I hear it all the time in the shop - where can I ride? Rock Creek is really not an option. The trail by the Potomac Parkway is too narrow and too dangerous. The surfacing there is a problem I'm sure you have heard about. The regular hiker-biker path that goes next to the road - that's not the road itself in Beach Drive - is really too narrow to accommodate the recreational needs of a lot of the cyclists that come through our shop.

The proposal from the Park Service is enlightened and great and a great step forward. I really welcome this kind of a proposal. I'd really like to see discussion about the access points to the park as well, Park Road and Calvert Street and further north as well that seem to be a problem getting into the park with non-motorized vehicles.

I see it all the time. People coming down from Adams Morgan and Mount Pleasant on Park Road are virtually pushed off the road by the cars coming down because it's very narrow there. Allowing weekday access to the park will make a huge difference for cyclists and much of our community. Thank you very much for your time.

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

"Christina Moon"

To: <rocr\_superintendent@nps.gov.com> cc:  
Subject: Make Rock Creek Park Available!  
07/14/2003 09:12 AM AST

I am writing to SUPPORT the National Park Service's preferred option to establish weekday recreation zones on Beach Drive in Rock Creek Park. Rock Creek Park is one of the great treasures of the Washington area, but as currently managed, the heart of the Park is available only to motorists five days a week. I commend the Park Service for seeking a balanced approach that will allow pedestrians, cyclists, roller bladers, and people of all ages and physical abilities to experience the Park seven days a week. I am a DC resident...I use Beach Drive almost daily, and I will not mind sharing the road on off-peak hours with bikers, hikers, walkers, and skaters. After all, that is the point of the park, isn't it?

Thank you - I know you'll do the right thing.

Christie Moon  
Human Resources Director  
Deluxe Restaurant Group  
[www.cafedeluxe.com](http://www.cafedeluxe.com)

ROCR 2750  
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ROCR 1596  
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JESSIE M. HARRIS

FLOWER AND NATURE PHOTOGRAPHY

4401 W STREET, N.W. • WASHINGTON, D.C. 20007  
PHONE: (202) 799-8348 FAX: (202) 838-9088

June 19, 2003

National Park Service  
Rock Creek Park Superintendent  
3545 Williamsburg Lane NW  
Washington, D. C. 20008 - 1207

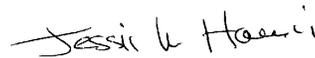
Dear Sir:

I recognize the conflict that must exist between the driver and the person who wants to enjoy the park experience. I appreciate your dilemma. Nonetheless I would ask that you close the segments of Beach Drive all day long as outlined in Alternative C.

We have this magnificent park in the middle our city and yet we have let it become a speedway.

I think it is time we gave the Park back to nature as was originally attended. It would be such a gift to the people.

Sincerely,



"Cowart, Bill"

To: <leveyb@washpost.com>

cc: <rocr\_superintendent@nps.gov>, <letters@washpost.com>

06/24/2003 08:32 AM AST

Subject: Rock Creek

Dear Bob,

Thanks for your brave column. You nailed it on the head, as hundreds of solo-driving car commuters (most of whom have probably never seen Rock Creek during the proposed recreation hours), will probably scream in a knee-jerk reaction, while the thousands of beneficiaries are less likely to give you the support you deserve. For example, school children who would never fathom that they could take a field trip to explore the natural beauty and wildlife of a serene weekday Rock Creek, unimaginable today, are unlikely to be crying out for a treat they have yet to experience. As a transportation planner by profession, I can also support your position and appreciate the difficulty in convincing people that converting a relatively minor off-peak route to recreational use outside of rush hours will not have noticeable impacts on other roads. I appreciate your willingness to take such a stand despite the unfairly adverse reaction you are likely to receive.

I recently moved from Glover Park to London, where the mayor this February took a similarly brave stand and imposed a 5 pound (8 dollar) "congestion charge" on most private vehicles driving downtown during the day. There were well more than the usual doomsday predictions and naysayers who thought there would be traffic chaos and irreparable damage to downtown businesses. Quite to the contrary, the charge has been a brilliant success. Downtown traffic levels have been cut around 15 percent, which, given traffic flow dynamics, has resulted in a 30-50 percent decrease in downtown travel times. The net revenues are all dedicated to public transport, bringing even more benefits to most commuters, whose buses are no longer stuck in so much traffic (and who can't afford London's exorbitant downtown parking rates anyway). And downtown businesses, understandably skeptical at first, have been surveyed as now showing greater than 70 percent support for the congestion charge, as the charge has shifted more frivolous, low-value discretionary trips to outside of the congested hours and provided greater freedom for shoppers and others with genuine need to ply London's busy downtown during weekdays.

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While I'm sure many of your readers will howl, these congestion charges (none on as large a scale as London's) are now in place in some form or another in dozens of cities worldwide -- including on certain roads in California, formerly home of the "freeway," and elsewhere across the US. The idea has been gently floated in both Maryland and Virginia in a variant called HOT lanes, where solo-drivers can buy their way into rush-hour HOV lanes with a toll. Studies in London, the US, and elsewhere have shown that, when properly implemented, these charges benefit all walks of life. Far from being a way for the rich to buy their way out of traffic jams, they provide relief equally to the benefit of anyone who walks when downtown, rides a bus, or has an important errand to which they need to drive. (That's just about anyone who ventures downtown, and many people twice, in my book.) No doubt, this worthwhile idea will incrementally be introduced in greater Washington as well in the coming years. Let's hope our politicians are visionary and it is sooner, rather than waiting and continuing to burden our life with the unnecessary automobile and SUV traffic -- the necessary is bad enough.

Let's also hope that the Rock Creek recreation plan doesn't get reversed in a reactionary fit by the commuters and politicians you so aptly described. The evidence is now clear that congestion charges not only are feasible, but work well in modern automobile-filled cities. We can dream that more measures to have drivers pay their fair share through congestion charges, and to avoid unnecessary trips that clog the roads, are implemented in Washington. And we have a great first step to limiting unnecessary driving and improving Washingtonian's quality of life by making Rock Creek Park truly a park again during recreation hours.

Sincerely,

Bill Cowart  
Transportation Planner  
ICF Consulting

---

"Julia Clark"

To: <jon.bouker@mail.house.gov>

cc: <chris.vanhollen@mail.house.gov>, <rocr\_superintendent@nps.gov>

03/28/2003 10:22 AM EST

Subject: a bike friendly Rock Creek Park

Thank you for supporting efforts to make Rock Creek Park more bike friendly by closing the roads to vehicle traffic during certain hours on weekdays. Still the Park is not safely usable for bike commuters. Please consider expanding this program to accommodate commuters.

Julia Akins Clark  
General Counsel  
IFPTE

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ROCR 0396  
Page 1 of 1

To: <rocr\_superintendent@nps.gov>  
07/09/2003 10:43 AM AST  
Subject: Comments

I am writing to support increased weekday bicycle use on upper beach drive. I live in Bethesda and work in Silver Spring. I use beach drive for bicycle commuting and recreation.

Please don't give in to short sighted fear tactics to maintain the status quo. What we need in boldness and vision aimed at improving the health of the humans who live and work in Montgomery County and Washington, D.C.

Increased bicycle use means less car use, healthier, thinner people and cleaner air.

This is good public policy!!!

Julia Akins Clark  
General Counsel  
IFPTE

To: rocr\_superintendent@nps.gov  
07/14/2003 05:49 PM AST  
Subject: Rock Creek for Cyclists- Good Idea

Dear Park Service,

I, and my biking associates, strongly support the Park Service's wish to close the park to automobiles on weekdays. Not only will this provide a venue for exercise, but it will also restore the park to a park-like state.

I don't see how doing this on a trial basis represents any threat to traffic patterns. There are certainly a lot more roads for cars than there are paths for bicycles.

Thank you for considering this email as you make your decision.

Pamela Helton  
for  
Indigo Spokes

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ROCR 1434  
Page 1 of 2

Rhett Asher  
To: "ROCR\_superintendent@nps.gov"  
<ROCR\_superintendent@nps.gov>  
07/15/2003 02:11 PM AST  
Subject: DO NOT CLOSE ROCK CREEK PARK

To whom it may concern,

I am writing to voice my opinion about the closing of Rock Creek Park for Trail use only. I am --AGAINST-- the closing of the Parkway! I use this parkway for recreational and professional reasons to gain access to Washington, DC. I have lived in that area for over 30 years and have found the parkway to be a convenient and scenic route into DC. Please consider my request to keep the parkway open.

Thank you for your time and consideration.  
Sincerely,

Rhett

Rhett Asher  
Director, Research & Education  
International Mass Retail Association

"Jonathan Skolnik"  
To: <rocr\_superintendent@nps.gov>  
Subject: Cyclists and Beach Drive  
05/19/2003 04:13 PM AST

As a transportation economist, a believer in sustainable transportation and an occasional driver on Beach Drive, I find the proposal to close Beach Drive during off-peak hours to be very troubling.

A major principal in transportation planning is to encourage people to drive in the off-peak when roads are less congested. Your proposal does the opposite!

A major principal in sustainable transport is to improve opportunities for individuals to commute on foot or by bike. By leaving cars on the road during rush hours, this plan also fails in this regard!

A major principal in planning public parks and facilities is to encourage multiple use. I travel off-peak downtown on business and like to drive on Beach Drive because it is a break from the city and its streets full of lights and traffic. It is my chance to enjoy the park. Your proposal will rob me of my enjoyment!

Another major principal in transportation planning is promoting safety. The current arrangement of cars and bikes sharing the road is unsafe. Your proposal does little to change

that as the hours where use is separated are the hours with the least conflicts!

As an economist who values efficient use of resources, it strikes me as inefficient to have bicyclists using a road built for automobile specifications, when a far cheaper bike path could meet their needs at lower cost and be available full time for bike commuters.

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Page 2 of 2

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If a new path is too expensive without off-setting revenues, why not make Beach Drive open only to those with EZ-Pass transponders (these are available for free in Maryland). You could then charge 10-25 cents a trip to drive on Beach Drive and use that money to build a bike trail system. This will cut travel on Beach Drive, provide a means to manage travel demand in the future, encourage sustainable commuter options and improve safety and accessibility for all!

Jonathan Skolnik  
Vice President  
Jack Faucett Associates, Inc.

To: rocr\_superintendent@nps.gov, rocr\_gmp@nps.gov,  
mayor@dc.gov, dccouncil@dccouncil@washington.DC.us,  
jon.bouker@mail.house.gov,  
chris.vanhollen@mail.house.gov,  
cc: rockcreek@waba.org, RockCreekPARC@mindspring.com  
03/28/2003 10:46 AM EST  
Subject: National Park Service Plan

I have just learned that the National Park Service has proposed a plan to limit weekday traffic on upper Beach Drive. I hope you will adopt this plan. If adopted, the NPS plan appears to offer new opportunities for weekday recreation in Rock Creek National Park for all residents of the Washington metropolitan area. More importantly, plans such as this will preserve the treasure of a national park for future generations and enhance the quality of life of all of us living in the city.

Residents using Beach Drive each day will surely complain and bitterly of the loss a favored way to get to work. We too live next to the park and my family uses Beach Drive to get to work. But all of us living by the park or using these roads should be reminded of what citizens learned in New York and other cities in the late 19th century--the immense value of preserving a park in the center of a city. Imagine what New York City would be like today without Central Park.

I came to realize the importance of projects like this while writing scripts and narration for a film "The Forest Where We Live," and a following 6-part series on the same theme for educational markets. I discovered that urban forests were critically important not just for their beauty but for preserving the quality of life of all those living in and around a city--reducing pollution, winds, heat and erosion. Without them, we would have the problems facing Atlanta, which has lost more than 70% of its trees in the last 20 years, namely enormous heat, lowered air quality, and a propensity for flooding.

I worry that Washington, D.C. will face the same problems as Atlanta when I see the massive deforestation taking place in the corridor between Washington, DC and Baltimore as well as on the landscapes to north around Rockville, Gaithersburg and beyond, and also to the south of D.C. in northern Virginia.

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With trees around the city being destroyed on such a mass scale, Rock Creek Park will surely be a critical bulwark against heat, pollution and flooding, and prove to be a vital link to the preservation of the quality of life and the beauty of this city.

We found in making the film a fair number of options which one can propose even to the developers who feel threatened by environmentalists. The old conflict between city/developers and environmentalists does not have to be.

There are solutions. In Michigan, California, Illinois and other states, developers, city planners and environmentalists

are working together to improve their cities. Chicago under Mayor Daley is a notable example.

The NPS plan suggests that leaders here may be equally progressive. I hope you will adopt this plan and begin developing other measures as well to protect the trees and open space in this city and surrounding suburbs of Maryland and Northern Virginia.

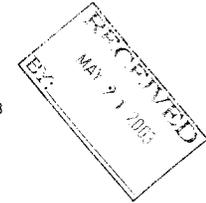
Anna Reid Jhirad  
Writer, Producer  
Marigold Productions

## PATRICIA McPHERSON

### Interiors

Superintendent  
Rock Creek Park  
Washington, D.C. 20008

19 May 2003



Sir:

I am writing to oppose proposals that would change the CURRENT system that allows cars and bikes to use the roads of Rock Creek Park on an equal basis. This is an issue that does NOT need fixing.

For almost 10 years, bike groups have operated below the radar screen of many area residents -- they have conducted regular "parades" through the park, escorted by Park Police vehicles during morning commuting hours (about 8:00 am), bringing car speeds down to under 5 miles/hour and temporarily halting access to roads in the upper park. These practices were the initial phase of a long-planned effort to persuade Park authorities that there was a vocal majority who wanted to restrict access to park roads. There is no formal commuter or car group organized to counter the bikers, but that does not mean that there is no fervent opposition to closing the road to cars under the proposals before you. I believe if the Superintendent restricts driving hours now, the bikers will definitely be back in the future to lobby for total closure. The ongoing Klinge Road is a case in point. (Where instead of closing down a road the lobbying is to open it up!)

The bike lobby espouses the elitist notion that they should have the park solely to themselves during a big chunk of the workday -- an interesting principle which stands the egalitarian view that parks are established for all to enjoy on its head. As a resident of Montgomery County (formerly a DC resident), my family works and goes to school in Washington. We are taxpayers in both jurisdictions. We enjoy the park by car and by bike on weekends. As a frequent driver of the park during the weekday, I can assert that there is NO traffic problem during the hours the bikers would like to have the park closed. During commuting hours, the lane restrictions are very efficient.

People like my 84-year old mother, a DC resident, should be able to enjoy a ride through the park in the middle of the day as part of a needed outing. I see no reason why bikers who are "afraid" to ride with cars can't use the bike path. I also do not understand why the Park Police cannot patrol the roads more effectively and on a regular basis and ticket speeders, those who pass illegally as well as truck drivers who don't belong. Oh yes, and the bikers who don't obey the rules as well.

Rock Creek Park -- all of it -- is a resource for all, not just bikers. Bikers need to learn to share the road and adhere to the law. Just because they are pollution free does not mean they have the right to the exclusive use of an entity supported by tax dollars of all citizens. Weekends are a perfect time to restrict auto use. The present system is fair and it works. Do not yield to the bike lobby.

cc: Washington Post

*Mrs. Harry McPherson*

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ROCR 0893  
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Metro Teleproductions  
To: rocr\_superintendent@nps.gov  
Subject: beach drive closing  
03/31/2003 11:49 AM PST

Please do not close rock creek park on weekdays 930-330 pm. I commute from dc to silver spring there is no way that 16th st, 14th and 13th can handle the overflow, especially when you are constantly fixing the roads. I understand the concept but rock creek is a major thoroughfare.. with the changes in security, especially along 16th with walter reed, this has to be taken into consideration.

To be candid I am urging you to keep things the way they are right now, a proposal to implement (hov) high occupancy on beach drive during rush hours penalizes single drivers. This certainly isnt an easy decision, I am asking you as a taxpayer and someone who deals with rock creek during rush hour and non rush hour to keep things as they are.

If you have any questions, please don't hesitate to call me.

Dave Lilling  
Metro Teleproductions Inc

---

Do you Yahoo!?

"Robert Brubaker"  
To: <ROCR\_superintendent@nps.gov>  
Subject: Alternative D, Mid-Weekday Recreation Enhancement (Beach Drive)  
03/31/2003 02:47 PM EST

Please respond to  
"Robert Brubaker"

National Park Service, Rock Creek Park  
Superintendent  
3545 Williamsburg Lane NW  
Washington, D.C. 20008-1207

Ref: Management of Rock Creek Park and the Rock Creek and Potomac  
Parkway Alternative D, Mid-Weekday Recreation Enhancement

Dear Sir or Madam;

There is a group of mostly senior citizens who bike ride mid-week. One favorite ride starts at Roosevelt Island, heads north out the Capitol Crescent Trail, across the Georgetown Connector, and then returns south through Rock Creek Park via Beach Drive. From Candy Cane City to Broad Branch Road there is no paved trail. These rides are mid-day and for the most part there is little traffic on Beach Drive as it winds through the Park. Unfortunately the few cars using the road at

that time of day travel fast. It sure takes away from the enjoyment of the Park when they zoom by.

I was actually pleased by the weakness of the counter-arguments I read about in the Washington Post (Page C7 3/30/03). At the time of day you are proposing the north section closure of Beach Drive, there is little traffic. It can't have a spill-over impact anywhere else, especially since the alternate routes also have little mid-day traffic. The concern about 'heighten security' is also easily addressed. I suspect I speak for many bicyclists when I say we understand that the road would be opened to car traffic during an emergency evacuation of the city.

Many Public Health Officials currently seek to reduce the impediments to fitness. Metroped is particularly concerned with removing Public Policy impediments to fitness. Your plan helps this goal.

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Page 2 of 2

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Thank you for proposing the Mid-Weekday Recreation Enhancement. I hope you succeed.

Sincerely,

Robert Brubaker, Director

Metroped Inc.  
[www.metroped.org](http://www.metroped.org)

"Rodrigues, Dennis (NIH/OD)"  
To: "rocr\_superintendent@nps.gov" <rocr\_superintendent@nps.gov>  
Subject: Comment on draft plan  
04/03/2003 09:51 AM EST

Thank you for sending me a copy of the draft plan. As a frequent user of Rock Creek Park, I'd like to voice my support of the NPS's preferred alternative, which would close 3 segments of Beach Drive during the mid-day. While I would probably prefer to see even greater restrictions on automobile use in the Park, I think your recommendation is balanced and fair.

Dennis Rodrigues  
Chief, On-Line Information Branch  
NIH Office of Communications and Public Liaison

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ROCR 0399  
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"David Roodman"  
To: <rocr\_superintendent@nps.gov>  
Subject:  
07/13/2003 07:26 PM AST

I am writing to SUPPORT the National Park Service's preferred option to establish weekday recreation zones on Beach Drive in Rock Creek Park. I believe it is essential for the health of the city and that the park, and urban assets such as the Park be made as attractive as possible as places to be in and near rather than convenient places to zoom through. And I am a regular weekday biker in the Park. Thank you.

David Roodman  
Co-director  
Parenting Division  
Pham & Roodman

"Simon Dixon"  
To: <rocr\_superintendent@nps.gov>  
Subject: Rock Creek Park  
07/14/2003 06:24 PM AST  
Please respond to Simon

Dear Superintendent,  
Thank you for taking the time to weigh up the future of Rock Creek Park. I am not a cyclist or much of a runner, but who knows; perhaps my newborn son might like to be one day. I'd love to think that there will be a place in DC that he could go and enjoy time riding in a park without taking his life in his hands. I travel through Rock Creek and know that some drivers treat it like a raceway. There are plenty of roads out there, (16th Street, Connecticut Ave etc.) but there is only one Rock Creek Park. I hope that you will find it in yourself to go the courageous route and close the Park to traffic during the day. When all the bleating falls away, you will be remembered for giving Washingtonians an island of peace in this ever increasing sea of stress we live in.

Thanks for taking the time to read this. Whichever way you decide, I hope the ride is not too rough.

Cheers,  
Simon Dixon

Simon Dixon  
Rock-it! Media

ROCR 0432  
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"Keith Ramsay"

To: <rocr\_superintendent@nps.gov>  
Subject: Roc Creek Park 07/14/2003 10:16 AM AST  
Please respond to kramsay

I am writing to SUPPORT the National Park Service's preferred option to establish weekday recreation zones on Beach Drive in Rock Creek Park. Rock Creek Park is one of the great treasures of the Washington area, but as currently managed, the heart of the Park is available only to motorists five days a week. I commend the Park Service for seeking a balanced approach that will allow pedestrians, cyclists, roller bladers, and people of all ages and physical abilities to experience the Park seven days a week.

Please note the following points that may be of interest:

- \* Beach Drive is one of the greatest recreational resources in the Washington, DC area and is used by thousands of people on weekends. Expanding this opportunity to weekdays would enhance quality of life for people all over the Washington metropolitan area.
- \* Beach Drive's recreation zones are part of a growing network of trails that make Washington and Montgomery County a prime destination for recreation.
- \* Beach Drive would remain open to motor vehicles 18 hour per day, including peak commuting hours during the morning and evening rush hour.
- \* The draft NPS plan is a very modest proposal, since it would provide for recreation zones for only 6 hours per day, during off-peak hours when traffic is relatively light.
- \* Beach Drive is not just another road for moving cars. It is a road that runs through a woodland, next to a stream, right in the heart of the city. Expanding its availability for recreation is a better use of this wonderful resource.
- \* Weekday recreation on Beach Drive is supported by more than 30 local environmental, recreation and community organizations.

Keith Ramsay  
Water Resources Engineers  
Rummel, Klepper & Kahl

"Sibley"

To: rocr\_superintendent@nps.gov  
Subject: Rock Creek Park Proposal 07/15/2003 03:52 PM AST

Dear Park Service,

As a resident of DC, I would like to express my full support for the National Park Service's proposal to establish weekday recreation zones on Beach Drive. It is rare that there is such a simple and straightforward opportunity to dramatically increase outdoor recreational opportunity in the middle of an urban area! As an owner of a business located near Rock Creek Park, I fully appreciate the usefulness of Beach Drive and the other roads in the park as a vital traffic conduit. But as you well know, the use of these roads by drivers varies dramatically with the time of day, and it is therefore clear that the modest proposal of a 6 hour daytime recreational period will not materially effect traffic patterns in DC, either in nearby neighborhoods or elsewhere. In fact, during the proposed time of day, transit times via rock creek park do not represent the large relative benefit over other arterials that they do during rush hour.

The recreational opportunity already presented by the park represents a truly invaluable resource to our community, and one that stands out as exceptional as compared to all of the urban areas in which I have resided. Frankly, I am thrilled to hear about this potential addition to that opportunity. I feel it is not only a great enhancement to the park, but an especially intelligent management of traffic patterns and transportation requirements.

I know that my own use of Rock Creek Park will be significantly enhanced by the implementation of this proposal. More importantly, thinking objectively about the bigger picture of overall benefit to DC and area residents at large, I cannot imagine that the benefits of this proposal do not far outweigh any drawbacks.

I strongly urge you to support the adoption of this measure.

Regards,

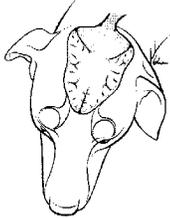
Tim V. Sibley, StreamSage, Inc.

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23 April, 2003  
JJMcDonnell  
Neurology-Neurosurgery

Tufts University School of Veterinary  
Medicine



National Park Service, Rock Creek Park  
Adrienne Coleman, Superintendent  
3545 Williamsburg Lane NW  
Washington, D.C. 20008-1207  
202-282-1063

Dear Superintendent Coleman

I support American Whitewater and agree that the General Management Plan for Rock Creek National Park is woefully inadequate in addressing management of Rock Creek.

The Plan should specifically authorize canoeing and kayaking in recognition that these activities are a traditional use of the Park and have been for at least 35 years.

The namesake river, Rock Creek, is regularly subjected to sewage overflows and urban runoff. It is a tragedy of the first order that the primary river in our Nation's Capitol is not better protected and that the Park Service is not doing more to recognize the problem and improve sanitation such that other recreation activities such as fishing and wading may be permitted in the Park.

The Plan should specifically address the continuing issues of water quality and sanitation. The Park must develop a planning mechanism for improving water quality throughout the Park and restoring the creek for fish health and viability, as well as public health.

Sincerely,  
  
Dr. John J. McDonnell



"Richard G. Andre"

To: rocr\_superintendent@nps.gov  
Subject: Rock Creek Park weekday use  
07/11/2003 05:12 PM AST

11 July 2003

Dear Superintendent:

I am writing to SUPPORT the National Park Service's preferred option to establish weekday recreation zones on Beach Drive in Rock Creek Park. Rock Creek Park is one of the great treasures of the Washington area, but as currently managed, the heart of the Park is available only to motorists five days a week. I commend the Park Service for seeking a balanced approach that will allow pedestrians, cyclists, roller bladers, and people of all ages and physical abilities to experience the Park seven days a week.

Thank you for your consideration of this matter.

Dr. Richard G. Andre  
Professor and Vice Chair  
Department of Preventive Medicine/Biometrics  
USUHS

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ROCR 1703  
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Gayle Berens  
To: "rocr\_superintendent@nps.gov"  
<rocr\_superintendent@nps.gov>  
07/14/2003 04:44 PM AST  
Subject:

Dear Sir/Madame:

I'd just like to register my opinion about Rock Creek Park and what should be done. Why don't you simply make a decent bike trail that connects through the whole park? It would solve a huge number of problems. The current bike trail, as you know, is very badly maintained, dangerous, ridiculously narrow, doesn't go through the whole park, and can't accommodate its many users. I understand it's not quite as simple as widening the current trail, but a good land planner should be able to come up with something that's workable. Gayle Berens

Gayle Berens  
Vice President  
Real Estate Development Practice  
ULI--the Urban Land Institute

"Larry Greenblatt"  
To: <rocr\_superintendent@nps.gov>  
Subject: closing of Rock Creek Park  
06/23/2003 01:24 PM AST

I've been meaning to send you this for weeks but I misplaced the Post article. You cannot close down Beach Drive to vehicle traffic during weekdays. I can't think of a worse scenario for the commuting nightmare that already exists between Montgomery County and the District. Currently we do not have a single highway connecting the city and the state of Maryland. Virginia has multiple highways that service the city. Maryland has none. I do not consider NY Avenue a highway. All we have is 16th Street, Georgia, CT. and Wisconsin Avenues. With bus traffic and lights it is unbearable already. And I'm not just talking about rush hour. It's all the time.

Please do not close Rock Creek Park.

Larry Greenblatt  
Viewpoint Communications Inc.

ROCR 0915  
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"Dan Ward"

To: rocr\_superintendent@nps.gov

cc: barkerk@washpost.com

Subject: Beach Drive Closure

04/02/2003 12:26 PM EST

Dear Sir,

I read Karlyn Barker's article "Park Service Proposes Beach Drive Closures" on the Washingtonpost.com website (go to

<http://www.washingtonpost.com/wp-dyn/articles/A49333-2003Mar29.html>) which indicated that there are possible plans to institute new traffic closures on beach drive. I would like to offer a few brief comments on this matter.

I live in Chevy Chase, MD and work in Dupont Circle. Every day I commute to work via Beach Drive. During my commute -- which can take a little more time than commuting via Conn. Ave, but is a FAR more enjoyable experience -- I marvel at the wonders of nature that I see every day. Instead of liquor stores and apartment buildings, I see waterfalls and rapids. Instead of car washes, I see natural stone walls. Instead of buses, I see deer (almost every night in the winter!). My morning commute is like my own little trip to Skyline Drive -- every day.

I admire the desire to make this section of Rock Creek Park more bicycle and pedestrian friendly -- I have spent many a weekend walking my dog or riding my bicycle on this section of Beach Drive, and am thankful for the fact that I do not have to be concerned with motorized traffic on the weekends. However, it is difficult to deny that this is a crucial traffic artery during the week, which is also a welcome departure from the commuting misery that is found on Connecticut Avenue.

I would ask that you consider other options to achieve your desired goals. Please feel free to contact me if you have any questions or seek additional community input. Please also notify me of the time and location of any proposed public hearings.

Thank you,

Daniel S. Ward

WARD & ASSOCIATES

**Appendix C**

**Organizations  
Comment Letters**

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MR. HAIRSTON: Ladies and gentlemen, I'm Joseph Hairston. I live in D.C. I'm here representing the 92<sup>nd</sup> Infantry Division World War II Association. We're an association of young men. Nobody is under 80. Just so there is no doubt about my position, let me start by saying a pox on everything that you proposed.

The founding document of this nation starts out with "We The People," not we the bureaucrats or we the government, but "We The People." Now we the people don't want it. You want to impose it on us and tell us it's good for us notwithstanding what we tell you.

I have lived almost 50 years within three blocks of the park. I have used the park when I was able to walk. My children have played in the park. It didn't bother us about the cars because the kids waded in the creek. We explored the hillsides. We used the park. We shared it with people who were driving. There's nothing wrong with that.

Now that I'm old, now that my members are old, we can't do that. Yet we like to drive through the park. It is a wonderful thing to drive through the park in the changing seasons, to see the buds come out in the summer and to see the leaves turn in the fall. We love the park.

Now, I don't trust the bureaucrats. You say you have traffic studies that say we do all of these good things and there won't be much impact. I have lived in Shepherd Park for almost 40 years. That is a major traffic artery. We know what traffic is like. If you move any traffic out of the park, notwithstanding the guy from Silver Spring who doesn't live there, it has to go someplace.

We have enough traffic on our streets already. Do you want people to breathe the fumes, or do you want trees to breathe the fumes? Trees can use the fumes. They use carbon dioxide. People can't use carbon dioxide. Think about it for a minute. Is the park for people or for a bureaucrat?

I don't trust the Park Service and what they say. When they closed the Beach Drive years ago, Sherrill Drive was supposed to remain open so that those of us who live in Shepherd Park and the northern part of Brentwood (PH) could go east and west across the park. You can't do that, and there was no public hearing changing it.

When it first happened, we could do it. Now you can't do that.

Why should we have to lose a part of the facility? As our Council Member stated, the enabling legislation said it was for all the people, not for some of the people some of the time. It was for all of the people all of the time. We expect our Park Service to facilitate our use of the park, not to inhibit our use of the park.

One of the things I've heard is you'll be able to get into Groves Ten (PH) or whatever that is at the upper end of the park. But do you want a bureaucrat telling you that you have to go this way and you have to go that way to get where you want to go? Shouldn't we the people be able to decide which way we want to go? We're not hurting anybody.

If I approach from Sherrill Drive or from Bingham Drive or from Kalmia Road or from Military Road, why shouldn't I be able to approach a road the way I want to rather than have some bureaucrat tell me I have to go this way because I like it that way? The bureaucrats said that's good for me. I don't want somebody telling me what's good for me.

We're not asking you for anything special for us. The fact that we're old men, we're not entitled to anything special, but we're entitled to the rights that we fought for that we inherited. We don't want you or anybody else to tell us what we should do and when we should do it. Leave us alone. Let us use our park. As I said, a pox on everything you proposed. Open the park to all of us at all times. Build a bike trail that separates cyclists from the drivers.

The way you fund it. One of those proposals has you moving the park people out of the park into new buildings. Save that money. Keep them in the park. I want you to stay in the park and watch the park and preserve it for us. Instead of doing that, use the money and find a way to have a complete trail for the cyclists all the way through the park. Do something for us.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

MR. ANDERSON: Good evening. I'm Lon Anderson, Director of Public and Government Relations for AAA Mid-Atlantic, 701 15<sup>th</sup> Street, N.S., 20005. And thank you for the opportunity to address you.

Alternative B continuing the current management plan with drastic auto eliminating—that is without drastic auto eliminating policy is our strong preference. The vast majority of visitors to the park from your own numbers are in fact commuters who utilize Beach Drive and other park roads through the park as part of their trips. Your figures indicate that you have about 2 million recreational visitors a year, about 12.4 million motorist visitors to the park on trips in which they are utilizing the park's roads on their way elsewhere.

Some would imply that those who make the park part of their drive on the way to other places are inferior visitors who have less right to enjoy the park than others. We disagree and object to the alternatives that would limit, restrict or end their access completely. Alternatives A, C and D would all limit traffic in one form or another. The message is clear. Visitors in cars are indeed inferior or a nuisance who must be limited. We strongly disagree.

This is an urban park, not a wilderness area. Much of the park already allows for safe joint use for pedestrians, bikers and vehicular traffic. More effort needs to be made to create safe paths and safe opportunities for all users.

On weekends much of the park is already restricted to nonauto use, and we feel that's appropriate and commendable and it's heavily used as a recreation facility at that time. Such would not be the case if it were just open to recreation during the week. But on business days the park is more than ideally placed for people's recreation for them to walk and bike and skate. It's an integral park with a transportation system for our nation's capital. And that transportation system, unfortunately, is currently rated fourth most congested in the nation. It has an enormous capacity issue.

And although the capacity issue is worse at rush hours, we have capacity issues on many of these roads in and out of the District much of the workday everyday. Additionally, while alternative D seems to define rush hour as ending at 9:30 a.m. beginning at 3:30 p.m. already we are seeing such definitions of road on our major arteries. And according to experts, our rush hours will continue to expand until they're almost not separated. This will take, admittedly, will take a toll on all but makes the availability of the park as a transportation resource of equal importance.

Ironically, shutting down Beach Drive daily during non rush hour will by definition then make that part of the park road solely a rush hour commuter route while severely limiting access of other park users who would drive to their park destinations to enjoy the park.

Comments submitted in 1998 on similar proposals indicated, according to your own summaries, that the largest group of commentators were satisfied with the current traffic patterns. We'd suggest this is still true. We would urge you to consider the damaging impact on surrounding neighborhoods and arteries that shutting it down to traffic would create, and certainly we've heard more about that tonight.

Lastly, we agree with your apparent underlying assumption that business as usual probably is not good business for the Park Service. We do not advocate the status quo. We would urge more enforcement and we would urge better control of the roads in the park borders. We think that enforcement and engineering can help make the park safer for all who use it, vehicular traffic, bicyclists, pedestrians. We understand that this is a resource issue and we'd be happy to work with you to help you find more resources for the enforcement that's needed.

And lastly, we don't think this ought to be your definitive statement for the next 20 years. We are in flux in the Washington Metropolitan area, traffic is getting worse. We think that you ought to come back and look in five years at a minimum and say is this the right way to go. And we think that the study is not focused on other alternatives that can be employed to tame traffic if necessary in the future.

The park is a treasure that we should all be able to enjoy and that you seek to include as many as possible, not as few as possible.

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

**ADVISORY NEIGHBORHOOD COMMISSIONERS' ASSEMBLY**  
140 BATES STREET, N.W.  
WASHINGTON, D.C. 20001

**ADVISORY NEIGHBORHOOD COMMISSION'S ASSEMBLY**  
April 26, 2003

May 15, 2003

**RESOLUTION**

Adrienne Coleman, Superintendent  
Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008-1207

*Opposing the alternatives in the Rock Creek Park General Management Plans that propose to close three sections of Beach Drive to automobiles.*

Dear Superintendent Coleman:

**WHEREAS**, The National Park Service, Department of Interior, announced in the Federal Register on March 14, 2003, the availability of a draft Environmental Impact Statement and General Management Plan for Rock Creek Park, Washington, DC.

Attached please find a Resolution that was adopted by the Advisory Neighborhood Commissioners' Assembly (ANC Assembly) on Saturday, April 26, 2003, that "opposes any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic."

**WHEREAS**, The Environmental Impact Statement and General Management Plan evaluates the following four alternatives for Rock Creek Park: (1) *Alternative A* would generally retain the current scope of visitor uses with improvements in visitor safety, better control of traffic volumes and speeds through the Park; (2) *Alternative B* would propose no actions at all; (3) *Alternative C* proposes to close three sections of Beach Drive to automobiles *at all times* and, thereby, eliminate traffic in much of the northern part of the Park; (4) *Alternative D* proposes to close three segments of Beach Drive in the northern portion of the Park to motorized vehicles *for a 6-hour period, from 9:30 a.m., to 3:30 p.m., on weekdays.*

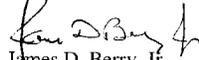
For your information, the ANC Assembly consists of a group of Advisory Neighborhood Commissioners from every ward in the District of Columbia, who come together monthly to work on ways in which to improve the Advisory Neighborhood Commissioner system, as well as to develop and to support initiatives that enhance the quality of life for those who reside in Washington, D.C.

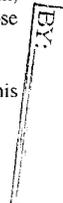
**WHEREAS**, Alternative D, which only completely opens Beach Drive at rush hour times, would facilitate commuter access through the Park but would have an adverse effect on local motorists and residents east and west of Rock Creek Park who will no longer be able to traverse the Park through local streets. They would be forced to go miles out of their way, even into Maryland in order to reach either side of the park.

We thank you in advance for giving prompt and serious attention to our position on this matter.

**WHEREAS**, Alternatives C and D prohibit access to Beach Drive from most roads and increase traffic on streets that are already heavily trafficked such as 16<sup>th</sup> Street NW, 14<sup>th</sup> Street NW, Military Road, Piney Branch Parkway and 13<sup>th</sup> Street, Park Road, and Blagden Avenue.

Yours truly,

  
James D. Berry, Jr.  
Chairperson

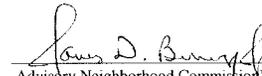
BY: 

**WHEREAS**, The proposal, by prohibiting automobile access to the park, benefits the young and mobile but penalizes many Seniors, the handicapped, small children and others with mobility challenges from using the park.

**WHEREAS**, The proposal, by prohibiting automobile access to the park, blocks access to emergency evacuation routes at Rock Creek Parkway and George Washington Parkway. THEREFORE, it is

**Resolved**, That the Advisory Neighborhood Commission's Assembly opposes any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic.

Approved at a duly noticed meeting on April 26, 2003, with a quorum present.

  
Chairman  
Advisory Neighborhood Commission's Assembly

JDB

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	<b>ADVISORY NEIGHBORHOOD COMMISSION 3C</b> <b>GOVERNMENT OF THE DISTRICT OF COLUMBIA</b> <small>CATHEDRAL HEIGHTS • CLEVELAND PARK • MASSACHUSETTS AVE. HEIGHTS MCLEAN GARDENS • WOODLEY PARK</small>
Single Member District Commissioners 01-Allen Hahn; 02-Kurt Vorndran; 03-Sally MacDonald 04-Richard C. Bartel; 05-John Welsh; 06-Trudy Reeves 07-Sheila Hogan; 08-Nancy Nord; 09-Nancy MacWood	2737 DEVONSHIRE PLACE, NW WASHINGTON, DC 20008 TEL 202/232-2232 • FAX 202/232-2232 Email <a href="mailto:anc3c@starpower.net">anc3c@starpower.net</a> Listserv <a href="http://groups.yahoo.com/group/anc3c">http://groups.yahoo.com/group/anc3c</a> Website: <a href="http://www.anc3c.org">http://www.anc3c.org</a>

	<b>ADVISORY NEIGHBORHOOD COMMISSION 3C</b> <b>GOVERNMENT OF THE DISTRICT OF COLUMBIA</b> <small>CATHEDRAL HEIGHTS • CLEVELAND PARK • MASSACHUSETTS AVE. HEIGHTS MCLEAN GARDENS • WOODLEY PARK</small>
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**ANC 3C RESOLUTION 2003-018**

**Resolution Regarding Rock Creek Parkway Circulation**

WHEREAS the National Park Service of the U.S. Department of Interior (NPS) has invited public comment on the Draft General Management Plan, Environmental Impact Statement for Rock Creek Park and the Rock Creek and Potomac Parkway, which provides four alternatives for consideration:

Alternative A: Improved management of established park uses including better control traffic volumes and speeds through the park by implementing high-occupancy-vehicle restrictions on Beach Drive during rush-hour periods in the primary travel direction of the traffic.

Alternative B: No action alternative - Continue current management practices

Alternative C: Permanently close selected segments of Beach Drive north of Broad Branch Road to motorized vehicles and promote nonmotorized recreation

Alternative D: Close three segments of Beach Drive in the northern portion of the Park to motorized vehicles for a 6-hour period from 9:30 AM to 3:30 PM on weekdays, enhancing recreational and education use of Park resources; and

WHEREAS ANC 3C includes the portion of Rock Creek Park west of Rock Creek, South of Rodman Street and north of the intersection of Rock Creek Parkway and Connecticut Avenue; and

WHEREAS the analysis of the environmental consequences found that all alternatives would have fairly similar effects on air quality, water quality and hydrology of Rock Creek and its tributaries, wetlands and floodplains, deciduous forests, and protected and rare species; and

WHEREAS the weekend traffic restrictions on Beach Drive have led to intensive recreational use by hikers, bikers, roller-bladers, and the wheelchair-bound; and

WHEREAS there is now no continuous bicycle path or trail traversing the length of Rock Creek Park and this lack is a major obstacle to bicycle commuting, which it is in the public interest to encourage, and

National Park Service  
Superintendent  
3545 Williamsburg Lane, NW  
Washington, DC 2008-1207

June 25, 2003

To Whom It May Concern::

On Monday, June 23<sup>rd</sup>, Advisory Neighborhood Commission 3C unanimously passed a resolution regarding the alternatives for Rock Creek Parkway circulation.

The resolution is enclosed. ANC3C commissioners appreciate your consideration of their view on this matter. If you have any questions or require further action on our part, please contact ANC3C Commissioner Trudy Reeves at (202) 364-8897.

Sincerely,



Nancy J. MacWood  
ANC Chair



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WHEREAS DC Department of Transportation has indicated that once the 16th Street reconstruction project has been completed, they would support a carefully controlled demonstration project on Beach Drive to monitor pre- and post-demonstration lane closures and measure predetermined evaluation criteria.

THEREFORE BE IT RESOLVED that ANC 3C supports the adoption of Alternative B and requests that the following provisions be incorporated into the General Management Plan, Environmental Impact Statement for Rock Creek Park and the Rock Creek and Potomac Parkway:

- (1) that no part of Beach Drive and Rock Creek and Potomac Parkway be subjected to high-occupancy-vehicle restrictions;
- (2) that NPS adopt as an objective broadening the existing bike path from Virginia Avenue to Beach Drive and the completion of a continuous bicycle path and hiking trail traversing the length of Rock Creek Park from Beach Drive to East-West Highway, exploring routes other than one adjacent to Beach Drive if necessary;
- (3) that NPS provide a minibus shuttle service between subway stations east and west of Rock Creek Park, the Rock Creek Nature Center, and the proposed Rock Creek Park Visitor Center during weekends to promote the use of Rock Creek Park by Metro riders;
- (4) that the proposed Rock Creek Park Visitor Center also include a police substation.

This resolution was approved by the ANC 3C by a unanimous vote of 8-0 at its regular public meeting on June 23, 2003, at which a quorum was present.

Attested by  , Chair, on June 23, 2003  
Nancy MacWood

MR. BARDIN: Good evening. I'm David Bardin, B-A-R-D-I-N. I live in D.C. I'm speaking of Advisory Neighborhood Commission 3F. I'm the Secretary of ANC-3F and we are all meeting tonight in ANC-3F. Welcome to our neighborhood. Very pleased to have you here, Superintendent Coleman. Always nice to see you again. And Chief Planner Gregerson. All right.

ANC-3F includes the portion of Rock Creek Park west of the creek, south of Military Road and north of Tilden Street. It includes most of Melvin Hayson Park and all of Soap Stone Valley Park, and it includes such landmarks in the park as Pierce Mill.

ANC-3F adopted a resolution which has been submitted for the record to the headquarters on Tuesday, and it includes a reference to the 1890 legislation which established the park that stated that it is to be perpetually dedicated and set apart for the benefit and enjoyment of the people of the United States and further directs the park managers to provide for public recreation and specifically to "lay out and prepare roadways and bridle paths to be used for driving and for horseback riding respectively, and footways for pedestrians."

We've reviewed the alternatives presented in the draft management plan and it resolves three things. First, ANC-3F recommends that the National Park Service adopt alternative B. Alternative B, that means continue current management with no action and—and, second we recommend that the National Park Service adopt out of alternatives A,C and D the following proposals and add them to alternative B, namely: (a) upgrade park trails; (b) increase use of park historic resources for interpretative and educational purposes, and; (3) improve park introduction information services and finally; (d) relocate the park administrative facilities and park police substation outside—outside the park.

And finally, third, ANC-3F recommends that the National Park Service revisit the policy of closing certain portions of Beach Drive to motorized traffic on weekends and that these sections be open for the benefit and enjoyment of all citizens at all times.

If time permits, I'd like to add to this position of the ANC some personal supplemental views concerning what I'll call looting and degradation of the park. The full restoration of Pierce Mill by the National Park Service and a private public partnership, access to the park via Soap Stone Valley Park, which is not really practical today, as well as analysis of some of the Beach Drive issues. Now, excess focus on proposed additional restrictions against traditional motorized uses of Beach Drive could carjack any general management plan. It could distract public attention from more valuable, albeit more difficult and more costly, measures that are needed or could be needed and really deserve intense consideration. The GNP or any final GNP should fully explore the question of adjacent landowners and what they do either by outright encroachment of their facilities into the park or pollution of the park. That needs to be a major focus of attention in the GNP, including what resources the Park Service has to deal with it, how you work with the city government, the building permit people, whether that could be improved. That's a whole area I'd like to see you add. Second, Pierce Mill. It's a question of rehabilitation. That's addressed in the GNP, but I really mean restoration. Get those millstones working and maintenance and operation. That could be costly. There's a partnership, as you know, with Friends of Pierce Mill. Our ANC has actually made a grant to Friends of Pierce Mill as part of the seed money to get it started. But we'd like to see the full restoration identified in the work that you do. Third, Soap Stone Valley Park, which extends from just east of Connecticut Avenue—  
MR. BARDIN: Right. I'd like to see you look at access either by acquiring land, acquiring easement, foot bridge, somewhere so people could get from Connecticut Avenue and the apartment houses, the Metro rail, the Metro bus into Rock Creek Park.

And finally, you're now restricting access to portions of Beach drive, 30 percent of the—  
Your proposal is to increase the restrictions to 63 percent, and that's really an awful lot when you won't let people even comment on reducing the restrictions and bringing them back.

Thank you very much.

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

Government of the District of Columbia  
**Advisory Neighborhood Commission 3F**  
North Cleveland Park ■ Forest Hills ■ Tenleytown

**FILE CO.**

3F01 Carl R. Kessler      Treasurer  
3F02 Karen Lee Perry      Vice Chair  
3F03 Robert V. Maudlin  
3F04 David J. Bardin      Secretary  
3F05 Judith M. Bernardi  
3F06 Cathy Wiss      Chair  
3F07 Stephen N. Dennis



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September 16, 2003

Ms. Adrienne A. Coleman  
Superintendent  
Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008

Dear Ms. *Adrienne* Coleman:

Enclosed is ANC3F Resolution 03-19 which was adopted on September 15, 2003.

The resolution recommends that there be no trial demonstration for the closure of Beach Drive between 9:30 am and 3:30 pm weekdays.

Very sincerely yours,  
*David J. Bardin*  
David J. Bardin, Secretary

enc. Res03-19

Res 03-19

**ANC 3F RESOLUTION REGARDING PROPOSAL FOR TEST CLOSURE OF BEACH DRIVE TO MOTORIZED VEHICLES**

Advisory Neighborhood Commission 3F  
North Cleveland Park, Forest Hills & Tenleytown  
4401-A Connecticut Avenue, N.W., #244  
Washington, D.C. 20008-2322

**WHEREAS:** ANC 3F includes the portion of Rock Creek Park west of Rock Creek, South of Military Road, N.W. and north of Tilden Street, N.W. including Melvin Hazen Park and Soapstone Valley Park ; and

**WHEREAS:** Beach Drive traverses this portion of Rock Creek Park; and

**WHEREAS:** in March 2003 the National Park Service (NPS) released a Draft General Management Plan, Environmental Impact Statement for Rock Creek Park and the Rock Creek and Potomac Parkway providing four alternatives for consideration:

- Alternative A: Improved management of established park uses.
- Alternative B: Continue current management/No action.
- Alternative C: Nonmotorized recreation emphasis.
- Alternative D: Mid-weekday recreation enhancement; and

**WHEREAS:** the major difference between the four alternatives is the traffic management measures for Beach Drive, with alternatives A, C and D providing for restricting or prohibiting motorized vehicles on certain sections of Beach Drive including the section in ANC3F; and

**WHEREAS:** Alternatives A, C and D also provide for:

- Upgrading recreation trails.
- Increasing use of park historic resources for interpretive and educational purposes.
- Improving park introduction and information services.
- Relocating park administrative facilities and U.S. Park Police substation outside the park;

**WHEREAS:** alternatives A, C and D would divert traffic that would use Beach Drive under alternative B to nearby residential and other street including streets in ANC3F; and

**WHEREAS:** on May 19, 2003 ANC3F approved Resolution 03-08 recommending that the NPS:

- A. adopt Alternative B: Continue current management/No action; and
- B. adopt the proposals in Alternatives A, C and D to (a) upgrade park trails, (b) increase use of park historic resources for interpretive and educational purposes, (c) improve park

introduction and information services, and (d) relocate park administrative facilities and U.S. Park Police substation outside the park; and

**WHEREAS:** the District Department of Transportation (DDOT) is now supporting a trial demonstration for the closure of Beach Drive between 9:30 am and 3:30 pm weekdays; and

**WHEREAS:** DDOT states that a trial demonstration would require review and approval by the affected Advisory Neighborhood Commissions; and

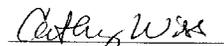
**WHEREAS:** the current mix of recreational and nonrecreational use of the park and parkway, including urban traffic, is appropriate and enhances the quality of life in the city and surrounding region; and

**WHEREAS:** adoption of Alternative B will permit the NPS to continue to implement service wide legal mandates and policies including natural resource management, cultural resource management, special use management and visitor experience and park use requirements;

**THEREFORE BE IT RESOLVED THAT:** ANC 3F recommends that there be no trial demonstration or other closure of Beach Drive to motorized vehicles; and

**BE IT FURTHER RESOLVED THAT:** ANC 3F recommends and urges DDOT to withdraw its proposal for a trial demonstration for the closure of Beach Drive.

Approved by a vote of 5-0-0 at a duly noticed public meeting on September 15, 2003, with a quorum present.

  
Cathy Wiss, Chair

  
David J. Bardin, Secretary

**ANC 3F (North Cleveland Park, Forest Hills & Tenleytown) COMMENTS REGARDING DRAFT GENERAL MANAGEMENT PLAN, ENVIRONMENTAL IMPACT STATEMENT ROCK CREEK PARK AND THE ROCK CREEK AND THE POTOMAC PARKWAY**  
Hearing - U.D.C. Auditorium - Bulding 46 - Windom Place, West of Connecticut Avenue  
Thursday, 22 May 2003

Superintendent Coleman and Chief Planner Gregerson:

I am David J. Bardin, Secretary of Advisory Neighborhood Commission 3F, appearing on behalf of our ANC which serves this neighborhood, in which we meet tonight. Welcome.

ANC 3F also includes the portion of Rock Creek Park west of Rock Creek, South of Military Road, N.W. and north of Tilden Street, N.W. including most of Melvin Hazen Park and all of Soapstone Valley Park. It includes such landmarks as the Peirce Mill.

ANC 3F adopted the attached resolution on Monday, May 19 and we appreciate Superintendent Coleman's attendance at that ANC meeting. Our Chair, Cathy Wiss (who is out of town today, as is Commissioner Maudlin who moved the Resolution), delivered our Resolution to Rock Creek Park (RCP) Headquarters on Tuesday for inclusion in the record in its entirety.

Our Resolution refers to the 1890 legislation establishing RCP as stating that it "be perpetually dedicated and set apart . . . for the benefit and enjoyment of the people of the United States"; and directing park managers to provide for public recreation, and specifically to "lay out and prepare roadways and bridle paths, to be used for driving and for horseback riding, respectively, and footways for pedestrians." It reviews the NPS alternatives and resolves three things:

**BE IT RESOLVED THAT: ANC 3F recommends that the National Park Service adopt Alternative B: Continue current management/No action; and**

**BE IT FURTHER RESOLVED THAT: ANC 3F recommends that the National Park Service adopt the proposals in Alternatives A, C and D to (a) upgrade park trails, (b) increase use of park historic resources for interpretive and educational purposes, (c) improve park introduction and information services, and (d) relocate park administrative facilities and U.S. Park Police substation outside the park, and**

**BE IT FURTHER RESOLVED THAT: ANC 3F recommends that the National Park Service revisit the policy of closing certain portions of Beach Drive to motorized traffic on weekends and that these sections be open for the benefit and enjoyment of all citizens at all times.**

We understand that July 15, 2003, is the deadline for further submittals in writing.

If time permits, I would like to present my supplemental, individual views [attached] concerning looting and degradation of Park land, full restoration of Peirce Mill, access to RCP via Soapstone Valley Park (as well as analyses of Beach Drive uses and restrictions).

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Res 03-08

ANC 3F RESOLUTION REGARDING THE DRAFT  
GENERAL MANAGEMENT PLAN, ENVIRONMENTAL IMPACT STATEMENT  
ROCK CREEK PARK AND THE ROCK CREEK AND THE POTOMAC PARKWAY

Advisory Neighborhood Commission 3F  
North Cleveland Park, Forest Hills & Tenleytown  
4401-A Connecticut Avenue, N.W., #244  
Washington, D.C. 20008-2322

WHEREAS: the 1890 legislation establishing Rock Creek Park stated that it "be perpetually dedicated and set apart . . . for the benefit and enjoyment of the people of the United States"; and

WHEREAS: the 1890 legislation directs park managers to provide for public recreation, and specifically to "lay out and prepare roadways and bridle paths, to be used for driving and for horseback riding, respectively, and footways for pedestrians."; and

WHEREAS: ANC 3F includes the portion of Rock Creek Park west of Rock Creek, South of Military Road, N.W. and north of Tilden Street, N.W. including Melvin Hazen Park and Soapstone Valley Park ; and

WHEREAS: the Draft General Management Plan, Environmental Impact Statement for Rock Creek Park and the Rock Creek and Potomac Parkway provides four alternatives for consideration:

- Alternative A: Improved management of established park uses.
- Alternative B: Continue current management/No action.
- Alternative C: Nonmotorized recreation emphasis.
- Alternative D: Mid-weekday recreation enhancement; and

WHEREAS: the major difference between the four alternatives is traffic management measures; and

WHEREAS: alternatives A, C and D would divert traffic that would use park roads under alternative B onto nearby residential and other street; and

WHEREAS: alternatives C and D would eliminate or reduce the traditional visitor experience of automobile touring along the length of the park, including the gorge area, which would be a major adverse effect on traditional park character and visitor experience; and

WHEREAS: under alternative A, two road segments would have noticeable degraded level of service (LOS), with associated adverse effects on community character; and

MAY 2 10 28 03

WHEREAS: the current mix of recreational and nonrecreational use of the park and parkway, including urban traffic, is appropriate and enhances the quality of life in the city and surrounding region; and

WHEREAS: the analysis of the environmental consequences found that all alternatives would have fairly similar effects on air quality, water quality and hydrology of Rock Creek and its tributaries, wetlands and floodplains, deciduous forests, and protected and rare species; and

WHEREAS: Rock Creek Park and the Rock Creek and Potomac Parkway do not have any special mandates that would affect this general management plan and future planning activities; and

WHEREAS: without a General Management Plan, The National Park Service will continue to strive to implement service wide legal mandates and policies including natural resource management, cultural resource management, special use management and visitor experience and park use requirements; and

WHEREAS: Alternatives A, C and D include:

- Upgrading recreation trails.
- Increasing use of park historic resources for interpretive and educational purposes.
- Improving park introduction and information services.
- Relocating park administrative facilities and U.S. Park Police substation outside the park;

THEREFORE BE IT RESOLVED THAT; ANC 3F recommends that the National Park Service adopt Alternative B: Continue current management/No action; and

BE IT FURTHER RESOLVED THAT: ANC 3F recommends that the National Park Service adopt the proposals in Alternatives A, C and D to (a) upgrade park trails, (b) increase use of park historic resources for interpretive and educational purposes, (c) improve park introduction and information services, and (d) relocate park administrative facilities and U.S. Park Police substation outside the park, and

BE IT FURTHER RESOLVED THAT: ANC 3F recommends that the National Park Service revisit the policy of closing certain portions of Beach Drive to motorized traffic on weekends and that these sections be open for the benefit and enjoyment of all citizens at all times.

Approved by a vote of 6-0-1 at a duly noticed public meeting on May 19, 2003, with a quorum present.

Cathy Wiss  
Cathy Wiss, Chair

David J. Bardin  
David J. Bardin, Secretary

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*Robert D. Stiehler*  
3234 Quesada Street, N.W.  
Washington, DC 20015-1663  
Phone: 202-537-1859

2002 March 2

Advisory Neighborhood Commission 3 & 4 G  
Chevy Chase Community Center  
Connecticut Avenue & McKinley Street, N.W.  
Washington, DC 20015

There has been a lot of conjecture pro and con about closing portions of Beach Drive in Rock Creek Park during weekday non-rush hours. Those favoring closure cite the recreational activities on Beach Drive during weekends and holidays. Those opposing closure discredit this analogy since most residents have weekends and holidays free and are not free to use the park during the week. Further, they fear the impact of traffic on neighboring streets such as Sixteenth Street, and Oregon Avenue if Beach Drive were closed on weekdays. Neither side has the facts, causing a lot of time to be wasted in polemics.

The facts can be obtained by a six-month trial closing of Beach Drive on weekdays during non-rush hours. The months of May through October are suggested to cover the three summer months when most school children are on vacation and many adults take their vacations during this period. During most of May, September, and October, few are free to use the park on weekdays. Data collected during the six-month period allow sound decisions to be made.

The six-month trial allows one of the following three obvious choices to be made:

Close Beach Drive during non-rush hours on weekdays all year.

Close Beach Drive during non-rush hours only from Decoration Day in May to Labor Day in September.

Do not close Beach Drive during weekdays because of the impact of traffic on streets near Rock Creek Park.

ANC 3&4 G is urged to request National Capital Parks to conduct a six-month trial closing of Beach Drive during weekday non-rush hours this year, and to collect the data needed for making prudent decisions on park management.

*Robert D. Stiehler*  
Robert D. Stiehler  
cc  
Adrienne Coleman  
Adrian Fenty  
Kathleen Paterson

**3/4G** Chevy Chase  
Advisory Neighborhood Commission 3/4G  
MAILING ADDRESS: P.O. BOX 6252 Northwest Station Washington, DC 20015

CHEVY CHASE OFFICE  
5601 Connecticut Ave. NW  
Washington, DC 20015  
(202) 963-5803  
FAX (202) 686-4366  
E-mail uppermwdc@juno.com

June 10, 2003

Mr. John G. Parsons  
Assoc. Regional Director  
National Park Service  
1100 Ohio Drive, SW  
Washington, DC 20242

Superintendent Adrienne A. Coleman  
Rock Creek Park  
National Park Service  
3545 Williamsburg Lane, NW  
Washington, DC 20008-1207

RE: DRAFT GENERAL MANAGEMENT PLAN/  
ENVIRONMENTAL IMPACT STATEMENT

Dear Superintendent Coleman and Mr. Parsons:

At its June 9, 2003 public meeting, the Chevy Chase Advisory Neighborhood Commission (ANC 3/4G), representing 14,000 upper north-west DC residents in Wards 3 and 4, voted 5 to 2 (a quorum being 4) to support *Alternative B, the no action alternative* as outlined in the draft General Management Plan of Rock Creek Park.

It is clear to ANC 3/4G that there is no consensus on the most important issue of closing Beach Drive on weekdays from 9:30 AM to 3:30 PM. Motorists want to continue using the road as a scenic and convenient route through Rock Creek Park. Residents on both sides of the Park and six Advisory Neighborhood Commissions do not want traffic (up to 2,500 vehicles/day) diverted into their neighborhoods. Senior citizens and the handicapped require weekday vehicular access to upper Beach Drive, the upkeep of which is paid for by federal funds. DC's Mayor believes that the closure of Beach Drive will interfere with emergency evacuation. Moreover, multi-year accident data provided by the U.S. Park Police (at ANC 3/4G's request) does not support any claim that upper Beach Drive is a dangerous road on weekdays, during non-rush hours, thus necessitating a ban on vehicular travel through the Park to safeguard relatively few cyclists, runners and hikers.

(continued)

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Superintendent Adrienne Coleman and John Parsons  
June 10, 2003  
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In addition, the draft Environmental Impact Statement asserts that a Beach Drive closure would:

- Have negligible effects on air and water quality;
- Have negligible impact on reductions in mortality for all park species;
- Not have a noticeable effect on rush hour volume;
- Confuse motorists who would have to detour around the closed sections;
- Have minor effects on traffic safety; and
- Endanger visitors with limited mobility or small children when closed segments are reopened.

For the above reasons, ANC 3/4G endorses *ALTERNATIVE B*. The Commission urges Rock Creek Park officials not to discriminate against the overwhelming majority (vehicular use) in order to accommodate a small minority (weekday recreation enthusiasts). Most local residents simply do not have the time to use the Park during the week because of work and school commitments.

In closing, the Commission thanks Superintendent Coleman for participating in its May 12 public meeting on the General Management Plan and appreciates the May 16 follow-up letter clarifying that the National Park Service (NPS) does not plan to close Bingham and Sherrill Drives on weekdays.

Sincerely yours,



Anne Mohnkern Rehschaw  
Chairman, ANC 3/4G

cc: Mayor Anthony Williams  
Councilmember Kathy Patterson  
Councilmember Adrian Fenty  
Terry Carlstrom, Regional Director, NPS  
Michael F. Byrne, Director, Office for National Capital Region Coordination,  
U.S. Department of Homeland Security  
Chairs, ANCs 3F, 4A, 4B, 4C, 4D  
Commander Jeffrey Moore, 2D, MPD  
Lt. G. William Davis, Commander, District Three, Rock Creek Sub-Station,  
U.S. Park Police

(Note: ANC 3/4G previously forwarded to RCP 484 signatures on letters and petitions from constituents within ANC 3/4G and 4A who want the present traffic patterns through Rock Creek Park maintained.)

**3/4G Chevy Chase  
Advisory Neighborhood Commission 3/4G**  
MAILING ADDRESS: P.O. BOX 6252 Northwest Station Washington, DC 20015

CHEVY CHASE OFFICE  
5601 Connecticut Ave. NW  
Washington, DC 20015  
(202) 363-5803  
FAX (202) 686-4366  
E-mail uppermwdc@juno.com

June 10, 2003

VIA FAX: 202-282-8404  
(Original sent by mail.)

Mr. Michael F. Byrne  
Director  
Office for National Capital Region Coordination  
U.S. Department of Homeland Security  
Washington, DC 20528

RE: DC EVACUATION – PROPOSED BEACH DRIVE WEEKDAY CLOSURE

Dear Mr. Byrne:

As you may be aware, the National Park Service (NPS) is contemplating closing upper Beach Drive through Rock Creek Park (RCP) during the week from 9:30 AM to 3:30 PM to accommodate a small number of recreation enthusiasts. This is not a good idea for many reasons, one of which has to do with an emergency evacuation of DC when all roads, including Beach Drive, will be clogged with drivers trying to leave the area.

While upper Beach Drive may not be designated a principal evacuation route, it is the only north-south limited access road between Canal Road and North Capitol Street. Beach Drive feeds into Rock Creek Parkway which handles such a volume of weekday rush hour traffic that its lanes are made one way to accommodate and expedite the flow of traffic traveling to or from downtown DC during AM and PM rush hours. Many of those vehicles would head for Beach Drive in an emergency.

If an urgent situation occurred during the week, necessitating a mass evacuation of vehicles from downtown, as many as six gates would block vehicles from using Beach Drive until the gates would be manually opened by Park Police and/or RCP workers (the exact plan, we understand, has not been finalized). It currently takes Park Police 30 minutes to reopen the gates and clear Beach Drive after the weekend closing.

(continued)

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Michael F. Byrne  
June 10, 2003  
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**Advisory Neighborhood Commission 4A**

DISTRICT OF COLUMBIA GOVERNMENT  
7600 GEORGIA AVENUE NW, SUITE 404  
WASHINGTON, DC 20021  
(202) 291-9341

ANC 3/4G supports Alternative B, outlined in the draft General Management Plan as the "no action" alternative. In other words, ANC 3/4G wants Beach Drive to remain as now configured, open to vehicles during weekdays.

ANC 3/4G hopes that you have a voice in keeping Beach Drive open to vehicular traffic during the non-rush hour weekday period. Beach Drive is an important, if not officially designated, evacuation route. In a post 9-11 era, homeland security must take precedence over recreation.

Sincerely yours,



Anne Mohnkern Renshaw  
Chairman, ANC 3/4G

- cc: Mayor Anthony Williams
- Councilmember Kathy Patterson
- Councilmember Adrian Fenty
- Terry Carlstrom, Regional Director, NPS
- John G. Parsons, Assoc. Regional Director, NPS
- Superintendent Adrienne A. Coleman, Rock Creek Park
- Chairs, ANCs 3F, 4A, 4B, 4C, 4D
- Commander Jeffrey Moore, 2D, MPD
- Lt. G. William Davis, Commander, District Three, Rock Creek Sub-Station, U.S. Park Police

Note: This letter was approved by a vote of 4 to 3 (a quorum being 4) at the June 9, 2003 public meeting of ANC 3/4G.

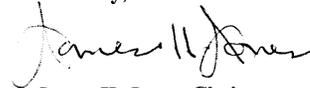
May 23, 2003

Ms. Adrienne Coleman, Superintendent  
Rock Creek Park, NPS  
3545 Williamsburg Lane NW  
Washington, DC 20008

Dear Ms. Coleman:

The Advisory Neighborhood Commission 4A appreciates the opportunity to comment on the Rock Creek Park General Management Plan. Please be advised that the Commission (ANC) 4A supports Alternative B which requires no actions and opposes all other alternatives that propose closing Beach Drive to automobile traffic. ANC 4A Commissioners unanimously adopted a resolution to that effect at its monthly public meeting on May 6, 2003. The resolution is attached to this correspondence.

Sincerely,



James H. Jones, Chairman  
Advisory Neighborhood Commission 4A

Attachment

BY: [ ]

**ADVISORY NEIGHBORHOOD COMMISSION 4A**  
May 6, 2003

**RESOLUTION**

*Opposing any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic*

**WHEREAS**, The Environmental Impact Statement and General Management Plan evaluates the following four alternatives for Rock Creek Park: (1) *Alternative A* would generally retain the current scope of visitor uses with improvements in visitor safety, better control of traffic volumes and speeds through the Park; (2) *Alternative B* would propose no actions at all; (3) *Alternative C* proposes to close three sections of Beach Drive to automobiles *at all times* and, thereby, eliminate traffic in much of the northern part of the Park; (4) *Alternative D* proposes to close three segments of Beach Drive in the northern portion of the Park to motorized vehicles *for a 6-hour period, from 9:30 a.m., to 3:30 p.m., on weekdays.*

**WHEREAS**, *Alternative D*, which only completely opens Beach Drive during rush hours, has an unfair discriminatory effect in that on the one hand, it would facilitate access through the Park to commuter traffic; however, on the other hand, it would prohibit access both through and across the Park to local residents during non-rush hour times. This alternative would have a further adverse effect on local residents both east and west of the park because residents would no longer be able to traverse the Park through local streets as is customary, but would be forced to go miles out of their way, even into Maryland in order to reach either side of the Park.

**WHEREAS**, *Alternatives C and D* prohibit access to Beach Drive from most roads and increase traffic on streets that are already heavily trafficked such as 16<sup>th</sup> Street NW, 14<sup>th</sup> Street NW, Military Road, Piney Branch Parkway and 13<sup>th</sup> Street, Park Road, and Blagden Avenue.

**WHEREAS**, The proposal, by prohibiting automobile access to the park, blocks access to emergency evacuation routes at Rock Creek Parkway and George Washington Parkway.

**WHEREAS**, The proposal, by prohibiting automobile access to the park, benefits the young and mobile but penalizes many Seniors, the handicapped, small children and others with mobility challenges from using the park.

**THEREFORE, BE IT RESOLVED**, That Advisory Neighborhood Commission 4A opposes any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic.

**FURTHER, BE IT RESOLVED**, That Advisory Neighborhood Commission 4A supports *Alternative B* in the General Management Plan which proposes no actions or changes at all.

Approved at a duly noticed meeting on May 6, 2003, with a quorum present.

 \_\_\_\_\_, Chairman  
Advisory Neighborhood Commission 4A

MR. SHEPPERD: Good evening. My name is Gregory Shepperd, I live in D.C. I'm the Vice Chairman of the Advisory Neighborhood Commission 4A, which is comprised of 8 single member districts representing approximately 18,000 residents in this upper Northwest community, which abuts and includes Rock Creek Park. I appreciate the opportunity to comment on the National Park Service general management plan.

At a duly noted meeting on May 6, 2003 and with a quorum present ANC-4A Commissioners unanimously adopted the resolution to oppose any and all changes in the Rock Creek Park general management plan that proposed to close Beach Drive to automobile traffic, and further to support alternative A in the general management plan which proposed no actions at all.

We observed that by prohibiting automobile access to the park alternative C and D would prohibit access to Beach Drive from most roads and increase traffic on streets that are already heavily trafficked, such as 16<sup>th</sup> Street Northwest, 14<sup>th</sup> Street Northwest, Military Road, Piney Branch Parkway, 13<sup>th</sup> Street, Park Road and Blagden Avenue.

Further, alternatives C and D would block access to emergency evaluation routes at Rock Creek Parkway and operate to benefit young and mobile and penalize many seniors, the handicapped, small children and others with mobility challenges from using the park.

Alternative D, which only opens Beach Drive during rush hours has an unfair discriminatory effect. It would allow access through the park to commuter traffic during rush hours, but not prohibit access—but would prohibit access to local residents during non rush hour times. For these reasons ANC-4A opposes any and all changes that will result in closing Beach Drive. We therefore support alternative B, which proposes no actions at all.

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

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MS. JONES: My name is James H. Jones. I'm the President of the Crestwood Neighborhood League, a community that abuts and includes Rock Creek Park. I'm also the Chair of the ANC-4A. Both organizations adopted resolution #B to oppose and all changes in Rock Creek Park.

I'm here tonight to represent the Crestwood League.

I feel that the general management plan as presented by the Park Service is a simulation, doesn't fully disclose the objectives of the Park Service. The name of the simulation is access control. The purpose of the game is to gain control of the roadways and thoroughfares in Rock Creek Park.

The players, those favoring an open system and those favoring the bicycle system. The open system, when Congress defined and dedicated Rock Creek Park in 1890 it established an open system with roadways for the purpose of driving, bridle paths for horseback riding and foot paths for pedestrians. Proponents of the system include residents, community organizations, ANC, commuters, enlightened government officials. Bicycle system, the proponents are the People's Alliance for the Park, Washington Area Bicycle Association and also the National Park Service, as evidenced by its preference to D, which would exclude automobiles from the park.

The game did not start today. It didn't start 7 years ago. The struggle started back in the '60s with the resurgence of the popularity of bicycles as a mode of transportation. At that time the proponents of the bicycle system began to lobby and influence the policies of the park. Park management made its first special accommodation to the bicycle people by preserving or reserving Ross Drive for bicycle use and prohibiting automobiles.

In 1966 the section of Beach Drive from Joyce Road to Broad Branch was limited to bicycles and pedestrian traffic on Sunday mornings and later extended to Murray Drive. By the fall 3? miles of trail had been reserved for bicycle use.

It was found, however, that the closed roads did not justify the closure. Motorists complained and management changed the policy.

In the '70s the bicycle system prevailed even more. They were successful in getting Park Service to set aside a lane in Rock Creek Park and Potomac Park for a week so that people could commute by bicycle. The experiment failed. There were massive traffic tie ups and people complained.

The Park Service also did some other things, too. One of the management objectives in 1977 was that the objective was to improve the quality of the visitor's experience by reducing excessive automobile commuter traffic on the roads within Rock Creek Park and encourage the shift to such traffic to mass transit, bicycles and other forms. They also had a study in 1980 which has been referred to and one of the alternatives was to build 5? miles of new bicycle trail paralleling Beach Drive and having no impact on automobile traffic. You would think that this would be one of the alternative today, but it's not. It should be, and I recommend it.

I would hope that the Park Service would not use this as an opportunity for this plan to disguise its objectives and try to select the bicycle system over the open system. It would be a mistake.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE. N.W.

WASHINGTON, D.C. 20005-3701

**ADVISORY NEIGHBORHOOD COMMISSION 4C  
May 13, 2003**

**RESOLUTION**

**Opposing any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic.**

WHEREAS, The National Park Service, Department of Interior, announced in the Federal Register on March 14, 2003, the availability of a draft Environmental Impact Statement and General Management Plan for Rock Creek Park, Washington, DC.

WHEREAS, The Environmental Impact Statement and General Management Plan evaluates the following four alternatives for Rock Creek Park: (1) Alternative A would generally retain the current scope of visitor uses with improvements in visitor safety, better control of traffic volumes and speeds through the Park; (2) Alternative B would propose no actions at all; (3) Alternative C proposes to close three sections of Beach Drive to automobiles at all times and, thereby, eliminate traffic in much of the northern part of the Park; (4) Alternative D proposes to close three segments of Beach Drive in the northern portion of the Park to motorized vehicles for a 6-hour period, from 9:30 a.m., to 3:30 p.m., on weekdays.

MAY 21 2003

WHEREAS, Alternative D, which only completely opens Beach Drive at rush hour times, would facilitate commuter access through the Park but would have an adverse effect on local motorists and residents east and west of Rock Creek Park who will no longer be able to traverse the Park through local streets. They would be forced to go miles out of their way, even into Maryland in order to reach either side of the park.

WHEREAS, Alternatives C and D prohibit access to Beach Drive from most roads and increase traffic on streets that are already heavily trafficked such as 16th Street NW, 14th Street NW, Military Road, Piney Branch Parkway and 13th Street, Park Road, and Blagden Avenue.

WHEREAS, The proposal, by prohibiting automobile access to the park benefits the young and mobile but penalizes many Seniors, the handicapped, small children and others with mobility challenges from using the park.

WHEREAS, The proposal, by prohibiting automobile access to the park blocks access to emergency evacuation routes at Rock Creek Park and George Washington Parkway.

THEREFORE, it is Resolved, That the Advisory Neighborhood Commission opposes any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic.

Approved at a duly noticed meeting on May 13, 2003, with a quorum present.

  
Timothy A. Jones  
Chairman  
Advisory Neighborhood Commission 4C

  
Kristen L. Barden  
Secretary ANC 4C

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Subject: American Discovery Trail support for Bike/Ped Plans

Dear Ms Adrienne Coleman,

As you may know the National American Discovery Trail ([www.discoverytrail.org](http://www.discoverytrail.org)) enters Rock Creek Park at Joyce Rd. and utilizes park trails all the way to Georgetown. We are also very interested in going north from Joyce Road to the recently opened trestle bridge and then utilizing the Capital Crescent Trail as an alternate way to get to the C&O Canal towpath and points west.

The American Discovery Trail is the nation's first non-motorized coast to coast recreational trail. Many of our users are from smaller towns and are intimidated by the traffic, and its attendant dangers, in a big city. Your approaches to the traffic problem would go a long way to alleviate this concern.

We strongly support your group's efforts to make the park more safe for bicyclists and pedestrians.

Harry Cyphers  
MD/DC Coordinator for the American Discovery Trail

July 15, 2003

Adrienne Applewhaite-Coleman, Superintendent  
Rock Creek Park Headquarters  
3545 Williamsburg Lane, NW  
Washington, DC 20008

Dear Superintendent Coleman:

I am writing on behalf of American Hiking Society (AHS) to comment on the new National Park Service's (NPS) proposed General Management Plan for Rock Creek Park. We urge the NPS to select its preferred Alternative D, Mid-Weekday Recreation Enhancement, to create a safe, tranquil recreation haven that can be accessed and enjoyed by millions of residents and visitors to the metropolitan area.

Mid-weekday car-free zones will offer area residents a peaceful escape from the hectic urban landscape and provide the opportunity for safe leisurely recreation in a wooded environment where a parallel trail is precluded by the park's topography. The limited road closures under Alternative D, combined with enhanced interpretation and educational opportunities, will protect and promote the natural ecology of the park, which in turn will enhance visitors' experiences and foster a greater appreciation for this unique natural, cultural, and recreational resource.

Increased access and implementing tighter traffic control measures throughout the park will promote the health and safety of recreational users and non-motorized commuters. Safety improvements may lead to increased commuting through the park on bicycle or foot. Increased access to the park also helps address a growing national public health crisis. Seventy-five percent of Americans get too little physical activity, 64% are overweight, and over 30% are obese. By increasing physical activity, activities such as walking, hiking, and bicycling reduce the risk of life-threatening diseases such as heart disease, diabetes, cancer, and other serious medical conditions.

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Of the proposed management plans, Alternative D best supports our belief that Rock Creek Park is a unique amenity that greatly enhances the quality of life in the Washington, DC area. Alternative D also extends recreation opportunities in the park through the construction, rehabilitation, or upgrading of at least 10 miles of recreational trails. The park's recreation zones contribute to a growing network of regional trails that make the metropolitan area a desirable place to live and visit.

As the national voice for America's hikers, AHS promotes and protects foot trails and the hiking experience. AHS represents its 5,000 individual members as well as the volunteers and members of its 160 member organizations ? including many in the DC area ? and is the only national organization dedicated to establishing, protecting and maintaining America's foot trails. We urge you to select Alternative D in order to protect this beautiful stretch of Rock Creek Park for the recreation enthusiasts of today and of future generations. Thank you for the opportunity to comment.

Sincerely,

Celina Montorfano, Director of Conservation Programs  
American Hiking Society  
1422 Fenwick Lane  
Silver Spring, MD 20910  
CMontorfano@AmericanHiking.org  
www.AmericanHiking.org



1424 Fenwick Lane / Silver Spring, MD 20910  
PHONE 301-569-9453 FAX 301-565-6714  
www.americanwhitewater.org

Adrienne Coleman, Superintendent  
3545 Williamsburg Lane NW  
Washington, D.C. 20008-1207  
202/282-1063

April 22, 2003

Dear Superintendent Coleman

I am writing on behalf of American Whitewater, a national non-profit organization that represents river recreationists. We have communicated with you, your staff, and your predecessors several times in the past regarding canoe and kayak access to Rock Creek.

We are concerned that the Draft General Management Plan for Rock Creek Park and the Rock Creek and Potomac Parkway does not appear to include any management statements regarding recreational use of Rock Creek through Rock Creek Park.

As the Plan is intended to provide comprehensive guidance on management actions, recreation, environmental conditions, and visitor use of the Park, it is surprising that the Draft EIS omits any reference to either the public's or Park's interest in managing the waters of Rock Creek. This is of concern for several reasons:

First, because American Whitewater asked in 1999 and 2000, and received verbal assurances, that the topic would be addressed in this management plan.

Second, because there is a documented history of institutional forgetfulness among the Park Police regarding historic agreements over the Superintendent's policy to allow canocing and kayaking.

Third, because the continuing issues of water quality and sanitation are not addressed in the planning document. The namesake creek for the Park, Rock Creek, is regularly subjected to sewage overflows and urban runoff. It is a tragedy of the first order that the primary river in our Nation's Capitol<sup>1</sup> is not better protected and that the Park Service is not doing more to recognize the problem and improve sanitation such that other recreation activities such as fishing and wading may be permitted in the Park.

Rock Creek is a unique urban sanctuary for recreationists and nature lovers within the city. It offers people the chance to hike, jog, bike, rollerblade, tour, and picnic on a daily

<sup>1</sup> The Potomac does not fall within Washington, DC's jurisdiction and is owned by the State of Maryland.

BY: [Signature]

basis. It also offers limited opportunities for cross country skiing, canoeing, kayaking, climbing and even ice-skating depending on the weather and season.

Unlike other regional tributaries to the Potomac, such as Difficult Run in Virginia, the whitewater on Rock Creek is of moderate difficulty. The creek is not particularly dangerous, and most of the rapids on the creek are rated Class I-II on the international scale of difficulty, with a couple of Class III drops located immediately downstream of the Rock Creek Ranger Station. Depending on water level, the waterfall created by the dam at Pierce Mill ranges from Class III-V. The creek is generally runnable in the immediate hours after a thundershower or for 1-3 days after an extended rainstorm.

I personally have enjoyed paddling the creek at both low and high levels, and have paddled the creek on multiple occasions when Beech Drive was closed due to flooding. The relative dangers were not appreciably different at the two levels and no rapid exceeded Class III with the exception of the waterfall at Pierce Mill. I found that the primary difference in the two levels was that there was less urban debris at the higher flows, and I didn't have to scratch the bottom of my boat on shallower segments.

In terms of safety, most boaters use lifejackets, helmets, and floatation when boating whitewater rivers. Boaters also tend to carry safety throw ropes, safety knives, safety whistles, and first aid kits. While the use of this equipment does not guarantee boater safety, it helps to mitigate the risk of the sport. Regardless, whitewater canoeing and kayaking are relatively safe and are comparable in risk to mountain biking.

There is a long tradition of boating on Rock Creek. While float permits were required for several years, the permit restriction was lifted in 1986. Since then American Whitewater estimates that a few thousand boaters have floated through Rock Creek without incident. For further information on the history of boating in the Park I encourage you to begin by reviewing Superintendent Ellard's 1987 letter to Ron Knipling [L30(NCR-ROCR)] in which Ellard states that "There is no longer a requirement for a boating permit..."

According to the published notes by Lt. Berberich of a Rock Creek Park Staff meeting in on April 27, 1993, "Kayaking is permitted on Rock Creek- no permit needed. USPP requested that a warning sign be placed along the creek to warn of Pierce Mill Falls ahead. Park stated that they would look at it." Lt. Kass forwarded this document to American Whitewater in March 2002, including the handwritten statement that "The current superintendent has continued this policy".

I have attached a timeline that American Whitewater has reconstructed of the major management points affecting river access on Rock Creek. This timeline clearly demonstrates that kayaking and canoeing are long established uses in the park and have been recognized as appropriate activities within Rock Creek. The document shows that canoeing and kayaking have enjoyed the support of many Park Superintendents over the past 30 years; but it also shows that there is a major problem of institutional forgetfulness about these activities within the Park.

As Ed Gertler wrote in 1997, "Because of the regular turnover in management and subsequent disruption in institutional memory, we are always concerned that our privileges might be disrupted by new management personnel who are unfamiliar with our activity and our good record as responsible users."

### Boating Timeline

- 1970 Ed Gertler, Conservation Co-chair of the Canoe Cruisers Association, canoed on Rock Creek. Ed recalls that canoeing was already an established use in the Park before he first floated this creek.
- 1978 Ed Gertler met with Superintendent James Redmond and drafted a river use permit. Superintendent Redmond adopted the boating permit for Rock Creek Park.
- May 10, 1978 Superintendent Redmond writes (A9031-NCR-ROCR) to Ed Gertler detailing the basic elements of the river use permit.
- 1980's Boating use continued with periodic interference by Park Police who were not aware of Superintendent Redmond decision to authorize canoeing and kayaking on Rock Creek.
- February 13, 1987 Superintendent Ellard wrote (L30-NCR-ROCR) to Mr. Ron Knipling and stated that "Due to changes in the United States Code of Federal Regulations which took effect on November 17, 1986, a canoe permit is no longer required in the National Capital Region of the National Park Service... Prior to November 17, 1986, the National Capital Region of the National Park Service was regulated by CFR 36; Part 50. To facilitate a consistent interpretation of laws concerning all National Park Service areas across the nation, we now use Part 7, CFR. There is no longer a requirement for a boating permit in this section."
- 1989 Ed Gertler asked Superintendent Swain if the permit system was still in effect. Superintendent Swain was unaware of the permit, but after reviewing applicable regulations stated that: a) he saw no reason to perpetuate such unnecessary paperwork, and b) that boating on Rock Creek should continue without permits.
- 1993 Boaters were again harassed intermittently by Park Police.
- April 27, 1993 Lt. Berberich's prepared notes for a Rock Creek Park Staff meeting state in item #3 that "Kayaking is permitted on Rock Creek- no permit needed. USPP requested that a warning sign be placed along the creek to warn of Pierce Mill Falls ahead. Park stated that they would look at it."
- May 22, 1993 Ed Gertler wrote to Superintendent Shields and asked for a clarification on boating policy in Rock Creek.
- June, 1993 Superintendent Shields responded in writing and stated that "I have coordinated our response and the National Park Service's position with the

- Park Police regarding paddle-type craft on the creek. There is no prohibition of kayaks and canoes on any section of Rock Creek that is under the jurisdiction of the National Park Service... We do recognize that boating is a compatible recreation activity in the park that should not be complicated or restrictive by a permit system unless future uses warrant... I hope that our position is clear on this issue.”
- July 7, 1993 Ed Gertler thanks Superintendent Shields in a letter, and states that he will pass on the information to local clubs and boaters.
- July 24, 1997 Ed Gertler writes to Superintendent Coleman to request that boating be recognized as a compatible use of the park in future planning documents. Ed Gertler requests that “Because of the regular turnover in management and subsequent disruption in institutional memory, we are always concerned that our privileges might be disrupted by new management personnel who are unfamiliar with our activity and our good record as responsible users.” Ed Gertler has no record of a response.
- September 17, 1999 Two canoers, Ron Knipling and Mark Halle, were asked to leave the river by Lieutenant Kass. The river was at a low/moderate level. An incident report was filed.
- October 1999 Two kayakers, Martin Radigan and a friend, were asked to leave the river by an unidentified officer. According to Lieutenant Kass no incident report was filed.
- October 18, 1999 Ronald Knipling, the president of the Blue Ridge Voyageurs Canoe Club, wrote to Superintendent Coleman about his encounter with Lieutenant Kass on September 17<sup>th</sup>, and asked for a resolution “in favor of unfettered access.”
- October 26, 1999 Ron Knipling contacted American Whitewater, and American Whitewater’s Access Director Jason Robertson wrote to Superintendent Coleman regarding continued support for boater access to Rock Creek.
- December 8, 1999 In response to a phone conversation with Assistant Superintendent Cindy Cox, American Whitewater faxed a letter to Assistant Superintendent Cox discussing the appropriateness of boating in Rock Creek. This fax included a copy of the October 26, 1999 letter to Superintendent Coleman.
- January 17<sup>th</sup>, 2000 In a phone conversation between American Whitewater and Lieutenant Kass, the Lieutenant explained that after reviewing Park records and speaking with Assistant Superintendent Cox, the current park administration would respect the former park supervisor’s decisions and continue allowing unrestricted river access. The Park police would not restrict boater access to Rock Creek regardless of river level.
- January 17<sup>th</sup>, 2000 American Whitewater’s Access Director, Jason Robertson, wrote to Assistant Superintendent Cox and Superintendent Coleman describing the content of the morning’s conversation with Lieutenant Kass and requested written confirmation of the boating policy. Based on discussions

- with Lieutenant Kass, it was American Whitewater’s understanding that the Park Police would continue supporting the boating rights and privileges that the public has enjoyed for the last 13 years. In other words, experienced whitewater canoers and kayakers would continue being permitted to float the Class III (IV) creek, regardless of water level and that no special permits or permissions would be required. American Whitewater requested that future planning documents explicitly reflect that canoeing and kayaking recreation are permitted.
- February 19, 2000 Nick Lipkowski, an American Whitewater employee and member, was asked to leave the river by Officer Timothy McMorow (Badge # 475) because he believed that boating was not permitted. A second officer walked up during the conversation between Mr. Lipkowski and Officer McMorow. This other officer reportedly commented that even if boating were allowed, the park police wouldn’t allow boaters on the river because it was too high. However, the river hydrograph indicates that the creek was at a minimum level for boating on the day of this incident and was not too high by any stretch of the imagination. This incident highlights the need for a clear policy statement on boating on the river, as well as a need for a formal education process for Park personnel on the public right to kayak and canoe Rock Creek. A policy statement is essential for securing our member’s ability to enjoy the river as they have for more than 30 years, and avoiding the perennial public problems of addressing this use when new park staff are hired.
- March 2002 Lt. Kass forwarded Lt. Berberich’s April 27, 1993 document to American Whitewater and included the signed and handwritten statement that “The current superintendent has continued this policy”.

Rock Creek is one of the foremost urban parks in America. It has effectively addressed use and recreation in an urban setting for decades. The continued tradition of allowing boater access is essential to many visitors’ enjoyment of the Park. It would be a tragedy for us to lose this opportunity through a misunderstanding of the visitor experience and management regulations.

In regard to water quality, in May 2001, Washington, DC’s Health Commissioner, Dr. Ivan Walks, issued the warning that, “We are not recommending that people use Rock Creek and enter Rock Creek because of standing high bacteria levels...” Dr. Walks added that the bacteria levels in Rock Creek are too high for human contact, and had been for the last year. It is not acceptable that the largest river in the Nation’s capitol is one of only a handful of rivers across the country for which there is a health warning. The Park must develop a planning mechanism for improving water quality throughout the Park and restoring the creek for fish health and viability, as well as public health.

American Whitewater encourages you to continue the tradition of working in partnership with the boating community and respect former Superintendent Ellard’s sentiments by continuing to allow floating in Rock Creek National Park. We strongly encourage the

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Park to explicitly allow canoeing and kayaking in Rock Creek National Park within the General Management Plan.

Please call me at 301-589-9453 if you have any questions or would like clarification on any of the matters detailed above.

Sincerely,

Jason D. Robertson  
Access Director  
American Whitewater

CC: Mac Thornton, Spokesman, Canoe Cruisers  
Ron Knipling, President, Blue Ridge Voyageurs  
Martin Radigan, Co-founder, Potomac River Safety Group  
Ed Gertler, Author, Maryland and Delaware Canoe Trails

MR. DRYDEN: Good evening. My name is Steve Dryden, D-R-Y-D-E-N. I live in Bethesda. I'm here tonight to represent the Audubon Naturalist Society of the Central Atlantic States where I'm Media Director. Autobon Naturalist Society is the oldest and the largest environmental group in the Washington area. We have about 10,000 members in the region. And we were founded in 1897, which makes us about as old as Rock Creek Park itself.  
MS. BIRD: 1890.

MR. DRYDEN: Yes. Okay. You've got a few years on us.

In any event, we would like to voice our support for alternative D, the mid-weekday recreation enhancement. We use Rock Creek Park as our outdoor classroom. Almost every month of the year we lead environmental education programs in Rock Creek Park. And in addition, many of our members use Rock Creek Park as a sanctuary where the beauty of the natural world provides a welcome antidote to the news of the day. Simply stated, Rock Creek Park is a Washington treasure. Closing three segments of Beach Drive in the northern portion of the park to motorized vehicles for a 6 hour period would enhance the park experience for all types of park users. This schedule is similar to the plan that is place in Central Park in New York City for one. Given the encroachment by manmade objects and new construction on the edge of the watershed of Rock Creek and possible reopening of a certain road, alternative D is a reasonable compromise. It would allow for the needs of commuters and restore opportunities for park experiences during the period between rush hours. We salute Mayor Williams for offering the idea of a compromise in his letter to the Park Service and we will be submitting a longer statement for the record shortly.

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July 14, 2003

Adrienne Coleman  
Superintendent Rock Creek Park  
3545 Williamsburg Lane  
Washington, DC 20008-1207

Dear Ms. Coleman:

Thank you for the opportunity to provide written comments on the Draft General Management Plan and Environmental Impact Statement for Rock Creek Park and the Rock Creek and Potomac Parkway. Audubon Naturalist Society (ANS), with 10,000 members in the Washington, DC metropolitan area, considers Rock Creek Park to be a treasure, and our environmental education programs frequently make use of the park's habitat as an outdoor classroom.

ANS supports the continued operations of the community gardens, horse center, golf course, and the rehabilitation and improvement of the nature center and planetarium. We support the draft's amplification of the establishing legislation's definition of "timber" as an essential resource in the park. In today's context, the forest community is a more preferred term to describe the value of the largest forest in the District of Columbia-Rock Creek Park.

We support continued measures to contain the threat of invasive exotic species, although we would prefer that it be formulated under the principles of integrated pest management. That would place the selective application of herbicides in limited portions of the park as a last resort after less toxic alternatives have been evaluated.

We support the National Park Service's preferred alternative of closing portions of Beach Drive near the Maryland border during non-rush periods on weekdays under the following conditions:

The weekday closure is done on a trial basis;

The plan for additional signs and maps of alternative routes is presented at a public meeting before the trial begins;

Data is collected on public use during the trial period to help determine whether the trial should be continued.

While ANS supports the above proposal, we are deeply concerned that almost all of the public comment generated on the draft management plan has been related to the transportation issues, and that the plan itself is dominated by descriptions of various transportation alternatives and their various impacts. Far too little attention has been directed at the primary importance of protecting Rock Creek Park's biological integrity.

Audubon Naturalist Society believes that the protection and restoration of the natural resources of Rock Creek Park should be the primary objective of the draft general management plan and environmental impact statement. Unfortunately, this draft inadequately assesses the existing conditions of park resources and falls far short of providing the management directions needed to protect and restore park natural resources in the future.

A suggestion: the Park Service Trends should assess trends for each of the topics considered in the Natural Resources chapter-air quality, watershed quality, wetlands, deciduous forests, protected and rare species, and other wildlife. A periodic communication could provide park constituents with a "report card" on the effectiveness of natural resources management plans.

Just a few weeks ago, I received the latest newsletter from NPS' Center for Urban Ecology. Research efforts to assess park resource trends were well described in the publication. Most of the work is taking place in other national parks. Why not start comprehensive efforts in Rock Creek Park?

ANS requests that the language in the draft contain an up-to-date acknowledgement of the public health impacts of polluted air. Since the draft was written, the Metropolitan Washington area has been downgraded to "severe" noncompliance with the one-hour ozone standard required by the Clean Air Act. People of all ages in the metropolitan area struggle with asthma and other respiratory problems due to nitrogen oxide and volatile organic compound pollution. The most recent emissions inventory indicates that cars and trucks are responsible for 45% of the NO<sub>x</sub> emissions and 30% of the VOC emissions. The next draft should include these facts.

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The draft plan indicates that the National Park Service has begun implementing recommended best management plans for controlling nonpoint water pollution problems associated with various park land uses. But the consistent failure of the surface waters in the park to meet water quality standards continues to be an unacceptable embarrassment for all of us who inhabit the watershed (see page 120 and 123). I do not agree with the draft's conclusion that water quality concerns in Rock Creek have "stabilized." No data is provided to support this conclusion. In fact, the assessment of conditions in Montgomery County found the section of Rock Creek south of Rockville to have fair to poor stream and habitat conditions. "Bank stability problems and high levels of sediment deposition impair the biological community," is how the county's Department of Environmental Protection characterizes the watershed just upstream of the District line. Further, the recent decision by the Maryland Department of the Environment to issue a permit for an expanded horse stable operation at the Meadowbrook facility in the Rock Creek flood plain poses an additional potential pollution threat.

Since 1993, ANS has sponsored a citizen water quality-monitoring program that monitors three tributary sites within the boundaries of the national park (Pinehurst tributary, Normanstone Run, and Haven Run). Unfortunately, our advocacy program often uses Rock Creek within the national park as an example of a degraded aquatic system in need of restoration. Blockages to fish passage, combined sewer overflows, and PCB, chlordane, and mercury contamination contribute to the cumulative problem. Among other measures, we would strongly support putting additional signs along Rock Creek that warn of the human dangers in consuming bottom-feeding fish because toxic contamination.

Wetlands are critical habitat for many wildlife species. They are essential as breeding areas for amphibian populations in Rock Creek Park. No net loss of wetland functions has been the goal of the Chesapeake Bay Program for many years. What management plans are being considered in Rock Creek Park to offer greater protection to existing wetlands? In addition, are there areas in the Park where the conditions are appropriate for restoring wetland function? Has the National Park Service conducted a thorough investigation of all seeps and springs within Rock Creek Park as a critical step towards offering them additional protection from park development projects?

The protection of our water resources is a primary focus for our organization. I would very much appreciate it if you would inform me of specific projects, the schedule for implementation, and the budget for future improvements pertaining to water quality.

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The largest forest in the District of Columbia deserves greater attention. We are concerned that current operations sometimes impact the health of forest trees. Near the existing H-3 stables, for instance, the dead, standing white oak trees in the area where rubble and stable wastes are stored indicate some negative environmental impact. Has the NPS fully explored sites outside of the park where these materials could be stored without the obvious impact on park forest resources?

A healthy forest is essential to wildlife abundance and diversity. A frequent destination for ANS forays is the "best warbler trap" in the city--the high ridge line that borders the west bank of Rock Creek between Broad Branch and Military Roads. A long-term study of bird populations in Rock Creek Park, conducted by ANS since the 1950s, supports other scientific assessments that show a marked decline in the populations of neo-tropical migrants.

For more than 100 years, Washingtonians of all social strata have experienced the beauty of Rock Creek Park, but the draft general management plan reveals that there is no interpretive plan to guide interpretive programming in Rock Creek Park and that many opportunities for reaching the public in the park are unrealized. The Park has many lessons to teach--and the public, many to learn. Now is the time for the Service to make a commitment to completing an interpretive plan.

As the pace of development in the Washington metropolitan area continues, the value of protected natural areas will grow. Audubon Naturalist Society pledges our continued support for the National Park Service's role as diligent steward of the park's natural resources.

Sincerely,  
Neal Fitzpatrick  
Executive Director  
Audubon Naturalist Society

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ROCR 1755  
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**Comments:** On behalf of the Board of Directors of the Audubon Society of the District of Columbia, I am writing to express our opposition to Alternative A of the Draft General Management Plan/Environmental Impact Statement for Rock Creek Park, in particular the proposal to build new administrative offices in the Maintenance Yard area (p. 76). Birders who know the park well know this is an important stopping point for many species of neotropical migratory birds--birds whose future is in doubt due to loss of habitat and other environmental pressures. Claudia Wilds, in her classic book, "Finding Birds in the National Capital Area," singled out the Maintenance Yard area as one of the best places in the city to see these birds. They do a great service to the trees in the park by reducing insect infestation-by as much as 50% according to scientific studies.

The long term future of the park, we believe, depends on careful management of the natural resources of the park, including its bird life. In our view, new construction in this environmentally sensitive area would have a very negative and disruptive effect on the park generally and in particular on the birds of the park, especially those most vulnerable to the destruction of an important feeding and resting area.

All residents of the District who look to the park as a green refuge from city pressures would certainly be impacted as well. I can tell you that our membership is very opposed to such a plan.

Thank you for this opportunity to comment.

Paul DeAnna  
Board of Directors  
Audubon Society of the District of Columbia

Subject: Do not close Beach Drive!!!

National Park Superintendent Adrienne Coleman  
Rock Creek Park  
3545 Williamsburg Lane NW  
Washington, DC 20008

Dear National Park Superintendent Adrienne Coleman,

It is totally a bad idea to close the Beach Drive.

Beach Drive is a very important artery, which links I-66 to the Maryland line. We can avoid the terrible traffic of Wisconsin Ave or Connecticut Ave by using Beach Drive. Otherwise we have to detour through GW Parkway or Canal Road, then I-495 to get to the Maryland line from Virginia. We think, no daily commuter between VA and Silver Spring will support the idea to close Beach Drive.

The need to recreation is important; but when it is at odds with the need for the working class to commute, we have to prefer the need of commuters. Visiting the park won't bring home the bread.

So we strongly oppose the idea to close Beach Drive!

Beach Drive Commuters Alliance  
Sincerely,

Beach Drive Commuters Alliance  
District of Columbia 20001

Subject: CAPRA Comments on RCP Management and Environment

TO: Adrienne Coleman, Superintendent, NPS

CC: CAPRA BOARD

FR: JAC SMIT, Treasurer

DT: May 21st 2003

RE: Commentary on 2003 Rock Creek Park Draft 'General Management Plan':

Thank you superintendent and thank you fellow board members for this opportunity. In somewhat less concise form I have offered these comments as a speaker at the public meeting on this topic at 4200 Connecticut Av. NW W-DC Building 46 last evening.

CAPRA is a city and regional planning group concerned with the sustainable development of the Chesapeake Bay watershed. We consider Rock Creek Park to be a cornerstone of the urbanizing region.

It was apparent to me last evening that there were two significant gaps in distinguishing Rock Creek Park:

A. The majority of the citizen commentaries appreciated Beach Drive as a calm green tunnel 'shortcut' between Maryland and Virginia. These commentators did not express their other appreciations of the Park.

B. The alternative Plans, as exhibited on posters and in the 'Summary', present Rock Creek Park as a 'walled garden' or park, having hard edges.

My assessment from the lens of the region, but with the capacity gained from living within five minutes from Rock Creek Park, and commuting through it five days a week, and running and playing in it at least 100 times a year includes:

1. Improvements in access for the disabled and elderly are highly desirable,

2. A bicycle and hike 'route plan' is needed. This plan should at least include the area from Wisconsin to Georgia Avenues. This 'planning area' includes: Fort Reno, Fort DeBussy, Fort Stevens, Dunbarton Oaks Museum, the Washington Cathedral, The National Zoo, the Hillwood Estate and Museum, American University, The University of the District of Columbia, Walter Reed Medical Center and other significant places of special interest to two-wheel and pedestrian tourists and recreationists.

3. Consideration might well be given to a 'porous border [say within 100 feet] particularly to include the functions of fitness and community gardening. Families that live within more-or-less the perimeters of Georgia and Wisconsin, when engaged in fitness and gardening within the Park [as within major urban parks from San Francisco to Boston], will declare ownership in the sense of accountability for maintenance and security.

4. Neighbors of the Park presented pleas to keep Beach Drive open to all traffic during weekdays in order to enhance the safety of their children. The strongest case was that these neighborhoods were lacking in the basic residential community amenity of sidewalks. I urge the Park Service to plead with The District of Columbia and Montgomery County to provide at least one sidewalk on all residential streets that have any through traffic. These children, in strollers and buggies, on bicycles and tricycles and on foot deserve safe access to the Park, and to school and the library.

5. CAPRA, as one of the guardians of the Chesapeake Region's ecological sustainability, is solidly in support of those groups and individuals speaking for greater attention to the biological diversity of the aquatic, and terrestrial plant and animal life of the park and its tributaries.

6. CAPRA is concerned with the poor status of aquatic biodiversity within Rock Creek Park. And we are aware that this is largely due to inadequate and inappropriate water management upstream in the watershed. We are not content with the level of pollution contributed to the Potomac and the Chesapeake by Rock Creek. We urge NPS partnership with NCPPC and local government agencies.

7. We are concerned to be assured of the plan's assessment that Ozone levels will not be effected. As we fear that ozone may settle in the lower levels of the Park.

8. Considering Homeland Security, thought might be given to keeping Beach Drive open weekdays during periods of 'Orange and Red Alert'.

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9. The ten-foot fence east of Rock Creek from the tunnel at the Zoo to Klinge Road is inappropriate. This fence cuts off the neighbors [with riparian rights] from Rock Creek and adds nothing to the value of the Zoo. The fence may be moved to the west bank to the benefit of all but especially the Adams Morgan and Mt Pleasant neighbors.

CAPRA has not studied the General Plan and Environmental Impact Statement, only the summary. We are happy to do so at your request.

We would very much appreciate receiving five copies of the Capitol Forts Parkway Plan at the address below for discussion and comment, again at your request.

Sincerely,

Jac Smit  
Treasurer CAPRA

Subject: Rock Creek Park for our Children

Ref. Editorial of 7/13/03, ROCK CREEK PARK

Gentle Persons,

There will be four winners when Beach Drive is closed weekdays off-peak.

The park itself as it regenerates biodiversity,

The people who use Rock Creek Park for leisure pursuits,

The businesses on Georgia Av., Fourteenth St. and Connecticut Av., and

The Baltimore-Washington Metropolitan Region's environment for living.

The traffic issue is readily resolvable through ordinary means.

Enhance the capacity of Georgia Av., 14th St., Western Av. and Connecticut Av., [16th is under construction],

Build sidewalks on impacted residential streets and connector streets, including: Western Av., West Portal St.,

Build traffic calming devices: cul-de-sacs, one-ways, speed bumps.

Most of these improvements are gaps in original planning or of up-grades. They may be paid for by a joint venture: Montgomery County, Washington DC, the National Park Service and home owners. State and Federal funds may cover some of the costs.

Sincerely,  
Jac Smit

I am a city and regional planner, a board member of CAPRA [Chesapeake & Potomac Regional Alliance] and a very frequent driver on Beach Drive from Van Ness to Silver Spring daytimes.

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MR. SMIT: Good evening. I'm Jack Smit, S-M-I-T. I'm a resident. I'm representing the Chesapeake And Potomac Regional Alliance, CAPRA. CAPRA is an alliance of people concerned with city and regional planning covering the Chesapeake Bay and the Potomac watershed. Of course, we have interest in Rock Creek.

So the first thing I wanted to say is looking at the various plans there's a further need to improve access to Rock Creek Park for the elderly and the disabled. That should be given a high priority. My second comment - and I know some people here will disagree with it - is that every street in Silver Spring and Washington, D.C. should have a sidewalk.

It's completely inappropriate in the 21<sup>st</sup> Century that we have residential neighborhoods without sidewalks. It just doesn't make sense. I say that as someone concerned with city planning. My third point is that we need a bike route plan, not just more bikes on Beach Drive. We need more bicycle routes so that we have more access for bicyclists and hikers in Rock Creek.

If you are going to do a bicycle route plan, it has to be from Wisconsin to Georgia, not just a plan inside the park. So you have to work together with city and regional planners from outside the NPS as to where those routes are needed, for instance, from American University to UDC, connecting bicycle trails from Metro stations on the west side of the park to the east side of the park.

So it has to be worked from the outside in as well as just from the inside out. It's not an enclosed capsule. There's a couple of other points that I would like to make. There are only two community gardens in the park. We should be thinking more in terms of two digits. There's a lot of interest in community gardens. People look after a park when they have a community garden in the park.

We need more playground access for young kids so they can really enjoy the park when they are there with their parents which can be done. Then there's a problem which I haven't seen addressed which is that the zoological garden has put a fence on the east side of Rock Creek blocking access of the residents of Mount Pleasant and Adams Morgan to Rock Creek.

I don't believe that the zoological garden actually extends to the east bank of Rock Creek. I believe it's on the west bank. That fence should be removed. The fence should be fencing the parking lot and not preventing access of the adjacent residents to the park. So those are my comments. Everything I see, you are on a good track. But it doesn't look like a finished plan to me for the people of D.C. and adjacent Maryland. Thank you very much.

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WASHINGTON, D.C. 20005-3701

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ROCR 2915  
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Subject: Make Rock Creek Park More Friendly to Recreation

Dear Park Superintendent:

I am writing to urge you to support the National Park Service's proposal to allow more recreation in Rock Creek Park during weekdays. Rock Creek National Park is a beautiful natural area that should be managed as a precious natural resource. After all it is supposed to be a park, not a highway. One measly 2 lane road is not ever going to solve DC's traffic gridlocks. Closing Beach Dr. for a mere 6 hours a day would encourage people to take public transit, the only way to really cut down on gridlock. Please manage this park for the environment and recreation, not SUVs.

Thank you for taking these comments into consideration when making this decision.

Andre Smith  
Center for Environmental Citizenship  
National Office  
200 G St NE, Ste 300  
Email: andre@envirocitizen.org

*Check out the all new Alumni Connection at: Washington, DC 20002-4328  
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CHESAPEAKE BAY FOUNDATION

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April 2, 2003

Ms. Adrienne Coleman  
Rock Creek Park Superintendent  
National Park Service  
3545 Williamsburg Lane, NW  
Washington, D.C. 200008-1207

RE: Rock Creek Park and Rock Creek and Potomac Parkway DEIS

Dear Ms. Coleman:

Please accept this comment on the Rock Creek Park and Rock Creek and Potomac Parkway Draft Environmental Impact Statement (DEIS). Pursuant to our previous comments concerning the preparation of this DEIS and the preferred alternative, and after reviewing the DEIS, we are in full support of the National Park Service's preferred alternative for management, "Alternative D."

This alternative, which would involve weekday, six-hour closures of upper Beach Drive (among other actions), would seem to best satisfy and balance a number of competing objectives. According to both our own preliminary assessment (transmitted to you in earlier comments) and this DEIS, this alternative would continue to accommodate rush-hour traffic needs and not be disruptive of other transportation, given the relatively low level of automobile usage during the day. It would also more effectively promote and enhance quiet, safe daytime recreational usage of a beautiful part of the park, and very modestly reduce some daytime production of air pollution and water pollution in the park through reduced auto trips, tailpipe emissions, and related automobile pollutant sources (from crankcase oil and other fluids to shreds of tires and brake pads).

In our view, improved overall traffic Level of Service (LOS) is not, in particular, an objective that the National Park Service, through the management and stewardship of a unit of the national park system, should be putting ahead of other, park-specific objectives – such as management of historic, cultural, and environmental resources, and promotion of active but protective park usage.

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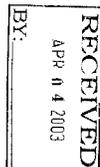
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Charles McC. Mathias  
Philip Merrill  
Summer Pingree  
Marie W. Riddler  
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In any case, it appears after your analysis that mid-day adverse LOS impacts due to adoption of Alternative D would be negligible, if noticeable at all. The other attributes of Alternative D are also worthy of taking forward to implementation, including, for example, rehabilitation of the Nature Center and other much-used facilities, badly needed trail improvements, and enhanced operations support.

While we might have liked to see more permanent closures, and while we hope that such opportunities might yet again be examined in future planning, we understand the need for balance at this time. It is in that light that we support Alternative D. Thank you for this opportunity to comment on the DEIS.

Yours sincerely,



Lee R. Epstein  
Director, Lands Program

MR. BROOKS: Good evening. My name is Ernie Brooks. And I am the current Chair of the Coalition for the Capital Crescent Trail. And I'm speaking on behalf of our Board tonight and in favor of alternative D.

I'm afraid I might lack the eloquence of some of the previous speakers, but I just have a couple of basic points to make.

The Coalition for the Capital Crescent Trail has been in existence now for 17 years, all the way from the conception of the trail through its acquisition, construction and continued enhancement. I think anyone who has used the trail would say it's a huge success. But we're also concerned with connections to other recreational venues, such as Rock Creek.

The National Park Service and Montgomery County have invested approximately \$25 million into Capital Crescent Trail and we believe the opportunity for weekday recreation would be greatly enhanced by linking the Capital Crescent Trail and a more recreationally friendly Rock Creek Park. There are many weekday users of the Capital Crescent Trail who would like to continue through Rock Creek Park on Beach Drive.

It's a natural tendency for people to oppose change. You see it all the time. When we began lobbying for the Capital Crescent Trail in 1986 the neighborhood along its route and almost every bureaucrat or politician in a decision making position opposed it. Once the trail was completed, every neighborhood loved us and thanked us and every politician wanted to take credit for it. I think this will be your experience if you do choose alternative D.

I also wanted to comment on a couple of things I heard mentioned tonight. One was that ten cars will be displaced for each cyclist. I don't know if that's correct or not, but even if it is, the difference would be that cars do have reasonable alternatives where cyclists perhaps do not.

Also, I happen to live 2 doors off of 16<sup>th</sup> Street right in the middle of the length of the construction that's going on now. When that started a year ago, everyone in that neighborhood said that the neighborhood would be flooded by all these cars that were backed up on 16<sup>th</sup> Street because of the construction. Well, they were half right. The backups are there. They're backed up all the time. But I live right on the alley that's parallel to 16<sup>th</sup> Street, 2 doors off of 16<sup>th</sup> and I haven't seen a single car cutting through our alley to get out of this traffic jam. So, if the commuters and not just commuters, but even during off commute hours 16<sup>th</sup> Street is jammed now because of the construction, if they're not trying to cut through our neighborhoods, why do people think that the few cars going through Rock Creek Park on Beach Drive during the midday hours will go out of their way to drive up through these neighborhoods and continue on with whatever—wherever they're going. So I think that's widely overstated.

Just to finish, I understand that the Park Service is perhaps considering a 6 month or perhaps a year trial period for this alternative. And I say what's to lose? Let's go ahead and give it a shot for 6 months and if it works, then continue on with it.

Thank you.

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WASHINGTON, D.C. 20005-3701



drienne Coleman

Rock Creek Park  
3545 Williamsburg Lane NW  
Washington, DC 20008

Subject: Rock Creek Park Draft Management Plan

Dear Superintendent Coleman:

The Board of Directors of the Coalition for the Capital Crescent Trail (CCCT) would like to include our support for a six-month trial period for the weekday non-rush hour (9:30am to 3:30pm) recreation zones on Beach Drive. Our Board generally supports multi-use recreational trails in the metropolitan area, and particularly in this case as the weekday recreation zones will provide an excellent link between the Capital Crescent Trail and the paved trails in lower Rock Creek Park. We were very fortunate to have recently opened the old railroad trestle that carries the CCT over Rock Creek in Montgomery County, and the question we get asked most often is "What's that trail that runs under the trestle; how do I get on it; and where does it take me?" It would be fantastic if we could answer that question with the reply that it is the Rock Creek Path, and you can take it between the hours of 9:30am & 3:30pm all the way down to the National Mall (and the other end of the CCT) with almost no concern for vehicular conflicts! That's a recreational loop in excess of 20 miles, and all it will take is extending the weekend closures to 6 hours during the least busy time of the weekdays.

We are certain that you have heard a number of voices raised in opposition, and we remind you of two other occasions on which there was a great gnashing of teeth before things settled down, and the citizenry saw that there was nothing to be concerned about all along.

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The first was your own weekend closure of the recreation zones some 20+ years ago. While this preceded the formation of the CCCT by some half-dozen years, many of our Board members lived in the area, and were involved in that effort. We recalled how certain groups of residents whose neighborhoods abutted the Park cried out that this was going to be such a huge mistake, and that their quality of life would never be the same. This has obviously not come to pass, and on the plus side, weekend usage of Rock Creek Park has more than doubled since those closures were put in place. It seems that the weekend closures were much more of a dramatic change than the currently proposed weekday closures, so if the former did not disrupt the lives of those living around the Park, then the latter certainly won't. The second is something that our Board has had a much more intimate relationship with, and that is the hue and cry that went up from almost every neighborhood that the CCT was going to pass through. It was so bad that once when we received a new batch of checks from our bank, and they were mislabeled "Capital Crescent *Trial*" instead of "C C *Trail*", we almost decided to keep them as the Trail had become such a Trial! Now that the CCT is the most popular Trail in the metropolitan area (not to mention that anyone lucky enough to live close to it has seen tremendous increase in the value of their homes), no one seems to remember that anyone ever had a negative thing to say about it. The bottom line is that nearby residents often overreact to changes like these, and whether you are a politician, management group, or advocacy organization, you have to look beyond the clamor and envision the great asset that you have a chance to bring to the people. We feel that a six-month trial period will be sufficient to show that there is no cause for alarm in this instance, and while it's not likely that you will see such a dramatic increase in recreational usage as has occurred on the weekend, the increase will be measurable, and will likely continue to increase the longer the recreational zones remain in effect.

Sincerely,

Ernie Brooks

Chair, Coalition for the Capital Crescent Trail  
[www.cctrail.org](http://www.cctrail.org)

MS. LASCH: Superintend Coleman, thank you for your attentive listening this evening. We appreciate it.

I'm Maryann Lasch, L-A-S-C-H. Washington, D.C. I'm a member of the Committee of 100 subcommittee for Parks and Environment and also of the Potomac Chapter of ASOA.

This evening I will tell you some of the concerns of the subcommittee of the Committee of 100. We will be developing an official statement at a later date after more study. We will not be commenting on traffic tonight. We'll give you relief from that. There are four alternatives in the plan and you have heard from many, and I'm sure you'll hear from many more people tonight.

I want to speak about what is not in the plan. As a strategic planner and landscape architect I know that this plan is to give you a vision and a strategic direction for 15 to 20 years. It does not.

The plan is not creative, inspirational, innovative or energetic. It does not create excitement about the wonderful resource that Rock Creek is on a local, regional or national level. It does not really spark an interest that will draw congressional funding, many partnerships to it. At the same time, it does not stress the urgency of the threat, many of which we are familiar with.

We know you are stretched today with funding and staffing that you are not able to do the thing that you would like to do and the programs that you want to innovate. This is a great pity, and I don't think that the plan does a good job of talking about the condition today. We've all seen steady deterioration of the resource. Change is inevitable. We need to prepare for it. We need to talk about how we're going to seriously manage it. It's more than just complying with your national requirements of the National Park Service. It's time for us to really look at how we can get ahead of that.

I'd like to see something very innovative that looks at the best practices of today, the innovations of tomorrow and how we can really create a national showcase for the park, which is right here in the Nation's capital, which is a neighbor of the headquarters of almost every environmental group in the United States and our Congress and our lawmakers.

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The interpretation recommendations in the guide are very lacking. There is no analysis to back them up. I see 5 pages of information that describes the population surrounding the park and 5 pages about road kill. I don't see a serious analysis of the demographic transfer from today to 2020, nor we look at what the varied populations around the park will want and need in the future. We really would like to see the education and interpretation programs address that. I think that partnerships is an issue that must be addressed. There is some initial work underway, but there's a much greater potential and a much greater opportunity to bring new energy, new people, new resources and new funding to the park to help you with your programs. Finally, the third decision point that you have addressed talks about your administrative functions and operations. I think that these should showcase the very best practices that you know of in resource management, in sustainability, in the marriage of development with natural resource conservative. I don't see that in the plan and we'd really like to see more of that. I'm hoping that these ideas of creativity and innovation will be developed in the final plan, and it will be an inspirational map for all of us.

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July 15, 2003

Adrienne Coleman, Superintendent  
National Park Service, Rock Creek Park  
3545 Williamsburg Lane NW  
Washington, DC 20008-1207

Dear Superintendent Coleman:

We are pleased to forward our comments on the Rock Creek General Management Plan. After preparation by our Parks and Environment Subcommittee, these comments were endorsed by both our Trustees and our membership.

We made every effort to reach out to other organizations and community representatives in reviewing the management plan, and in the course of our review sponsored a bus tour of the park. We appreciate the special effort your staff made in accompanying us on our bus tour of the park.

We trust that these recommendations will lead to a working relationship with the National Park Service that will prove beneficial to all.

Thank you for your attention to this matter. If you have any questions concerning our statement, please contact Loretta Neumann, chair of our Parks and Environment Subcommittee, 202-882-9274, email: [Lneumann@boo.net](mailto:Lneumann@boo.net)

Sincerely,

Ann Hughes Hargrove  
Chair

Enc: Committee of 100 Comments, Rock Creek General Management Plan

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**Comments on the Rock Creek General Management Plan  
Committee of 100 of the Federal City  
July 15, 2003**

**Introduction**

The Committee of 100 has supported the full realization of the Rock Creek Park mission since our founding in the early 1920's. During the 1990's, we participated and commented on the initial work by the National Park Service that led to the development of the draft General Management Plan (GMP).

We cite this background as evidence of the depth and seriousness of the Committee of 100's:

1. Commitment to the Rock Creek Park mission and to ensuring the health and success of this extraordinary national and local resource,
2. Interest in the proposed GMP and establishing a clear, strategic direction and priorities for management of this urban park, and
3. Desire for a strong working relationship with the National Park Service and the community in achieving these goals.

Before providing comments on the Alternatives and on specific findings and recommendations, we offer some general comments.

We are pleased that the Draft GMP has finally been completed and issued. It is fitting that the GMP recognizes Rock Creek Park's intrinsic value to the city, the region, and to the nation as an urban park, a place of great natural beauty, and as a travel corridor.

In spite of the Park Service's good intentions and years of preparation, we find the Draft GMP to be deficient in substantive ways that threaten its credibility:

- The GMP is unbalanced in its analysis and corresponding recommendations for management of an urban park and all its resources. Rock Creek Park has much more to offer than a scenic commute by car or bike. The plan gives short shrift to other users and the other management opportunities and challenges that will shape the future use and health of the park.
  - Presented to serve as both a Management Plan and an Environment Impact Statement, the hybrid document ends up doing neither well.
  - Relying on outdated studies and statistics, the recommendations lack currency and may have led to faulty projections and, consequently, inappropriate recommendations.
  - The GMP excludes properties of the Rock Creek Park administrative unit (such as the Tennis Stadium, Carter Barron Amphitheater, Dumbarton Oaks and Montrose Park), that are directly adjacent to the park and should have been included in the GMP.
  - And, especially critical, given limited federal funding resources, the plan does not provide sufficient guidance on how the National Park Service will set its priorities for protecting and managing the park in the future.

**Comments on the Rock Creek GMP - Committee of 100**

**Findings and Recommendations**

There are significant omissions and drawbacks in each of the four alternatives presented in the GMP. We will use Alternative A as the basis for our recommendations, not because we support it, but because we have concluded that it offers a better basis from which to start and to incorporate modifications. Our comments and recommendations generally follow the format of the plan.

**1. Traffic management**

Traffic management is integral to preserving Rock Creek Park's intrinsic character, enhancing the park experience for all visitors, and protecting and managing the park's complete resources on an ongoing basis. Specific tools for managing traffic are needed, and current data is required to determine the best combination of actions. At a minimum we recommend that these problems and approaches be thoroughly studied or re-evaluated:

- a) **User Fee.** Test the feasibility of a fee-for-use charge (for motorized vehicles only) during the A.M. and P.M. peak commuting hours in those portions of Beach Drive and Rock Creek Parkway south of Military Road where traffic volumes exceed the Level-of-Service E threshold. There is already strong precedent for such actions--the NPS charges user fees at many of its parks. Moreover, the technology exists to collect such fees unobtrusively, e.g., the Dulles Tollway does so with transponders. The NPS could make appropriate exemptions available, such as for residents neighboring the park.
- b) **Transit access.** Explore ways to provide increased public transit access to and within the park in order to reduce traffic congestion and to offer greater access to visitors without cars (e.g., trolleys or mini-buses could travel to and through the park from nearby Metro stations and bus stops and through-park loops could be tied to interpretive programs.)
- c) **Pedestrian access.** Increase pedestrian access from nearby neighborhoods including Adams Morgan, Mount Pleasant and the upper parts of Wards 3 and 4. Improve existing access points, including maintenance, signage, and pedestrian crossings. To advance the McMillan Plan and the emerging Potomac Heritage National Scenic Trail system, Rock Creek must provide better non-motorized crossings through the park at both the Escarpment and the Fort Circle.
- d) **More study.** A number of recommendations in the GMP need further study before they can be recommended for implementation. These suggestions deserve further evaluation:
  - **Parkway closings.** Develop and test some of the park road closing strategies described in Alternative D to more fully measure their impacts on visitation, interpretation, natural and cultural resource management and wildlife habitat.
  - **HOV-2.** Study in greater depth the potential of HOV-2 strategies to reduce commuting volumes without impacting the scenic and historic character of the parkway.
  - **Traffic calming devices.** Investigate the use of traffic calming devices that Alternative A proposes in a manner that will preserve the historic nature of the park roadways. Test these devices in selected locations to identify the most appropriate and effective ones.
  - **East-west congestion.** Conduct a study of possible measures for mitigating east/west traffic congestion
- e) **Continuous bike trail.** Re-evaluate development of a continuous bike trail throughout the park or additional portions of the park, focusing on the separation of bicycle and automobile traffic during all hours that park roads are open.

**2. Profile of visitor demand and visitor experience**

The GMP completely overlooks the impact of changing visitor demographics. Although the 2000 census shows significant changes in the region's population, this census information was excluded in drafting the GMP. A comprehensive visitor survey and analysis is essential to guide front-end NPS decisions about future visitor experiences and to re-connect the park to the life of nearby communities.

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## Comments on the Rock Creek GMP - Committee of 100

July 15, 2003

At a minimum, the study should address:

- a) **Existing conditions.** Identify existing uses and users;
- b) **Future projections.** Project future visitors trends, uses and user populations;
- c) **Impacts.** Determine visitor impact on resources;
- d) **Plan response.** Develop management strategies to support increased visitor uses and to mitigate visitor impacts;
- e) **Education programs.** Identify resource-driven education programs (e.g., recreation, science, nature, arts, music, landscape and industrial history, journalism, sustainable and healthy lifestyles) to improve the public's use and appreciation of the park;
- f) **Outreach.** Enhance outreach activities to schools, community centers, senior centers, etc in the region, to educate the community about park activities.

### 3. Protecting Intrinsic Park Resources

We believe that Rock Creek Park would be best served by a comprehensive approach to identifying and managing its intrinsic resources (scenic, historic/cultural, natural, archeological, recreational, and scientific). The GMP information on these resources is incomplete and hard to use. Additional studies are needed to complete the strategic direction of the GMP and responsibly move to taking action.

We strongly urge that the NPS fund and complete these high priority studies in the immediate future:

- **Water Quality and Storm Water Management.** A comprehensive water quality study and management plan, including a Storm Water Action Management Plan and the related environmental assessment of existing and planned conditions;
- **Cultural Resources.** Complete the inventory of cultural landscapes and a survey of archaeological resources.
- **Land Acquisition.** Identification of additional land acquisition needed to protect park quality and management;
- **Sustainability.** Detailed plan for sustainable management of all resources;
- **Research.** A series of pilot programs to test and develop detailed research on best scientific and management practices in concert with local universities, environmental management and research program of federal agencies and environmental organizations; and
- **Revised EIS.** After preparation of the final GMP, a revised Environmental Impact Statement should be developed for public comment and review by NCPC and other agencies.

### 4. Interpretation and Education: Park Facilities and Reuse of Historic Structures

We support the direction of Alternative A with the following comments and additional recommendations:

- a) **Endorsement.** We endorse these approaches in Alternative A:
  - Conversion of the Lodge House to visitor use and relocation of the Park Police substation to facilities outside but adjacent to the park;
  - Adaptive reuse of Klingle Mansion and relocation of park headquarters in leased offices outside but adjacent to the park;
  - Rehabilitation and expansion of the Nature Center and planetarium; and
  - Restoration of Peirce Mill.
- b) **More guidance.** The Plan does not provide adequate guidance on how Peirce Mill, Klingle Mansion and the Lodge House will be restored and used in the future.
  - While the GMP budgets \$1.73 million in capital costs for Peirce Mill, this is insufficient funding to restore full operation of the mill. When restored again to operation, the Mill can serve as an outstanding example of one of the earliest industrial processes. Peirce Mill is a key cultural resource in Rock Creek Park and a popular visitor site since its restoration in 1935. Although the Rock Creek Park staff developed an educational program for schools entitled *Milestones to Millstones*, the milling machinery has not been repaired since it failed in 1993.

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## Comments on the Rock Creek GMP - Committee of 100

July 15, 2003

- We strongly urge development of a plan, including funding, for the use of Klingle Mansion and the Lodge House before any action is taken to lease or change uses. This requirement should be included in the GMP.
  - The GMP should clearly state that any changes proposed to historical resources will require compliance with Section 106 of the National Historic Preservation Act. Other changes within the park may require additional environmental reviews and impact statements under the NEPA.
- c) **Interpretive program for lower park.** Edgewater Stables should be investigated for its potential suitability as a site for educational outreach and interpretive programming in the lower portion of Rock Creek Park.

### 5. Administration and Operations

We endorse the relocation of the administrative offices and police headquarters out of the historic structures to commercial space outside and near the park.

We offer the following additional recommendations:

- a) **No new construction.** We oppose the construction of new facilities within the park for administration and operations. We believe it is best to remove these activities and their impacts from the park.
- b) **Plan for re-use.** Prior to moving out of the current facilities, however, the plans and agreements for the restoration and reuse of Klingle Mansion and the Lodge House must be approved. (See 4b)
- c) **Staffing for the park.** Staffing levels, in number and grade level, need to be raised to properly recognize the significance of this park to the Nation's Capital. At a minimum, the National Park Service or federal Office of Personnel Management should elevate the grade requirement of the Superintendent to the level of Grade 15 or Senior Executive Service (SES).

### 6. Financial issues

Because the report depends on data that is several years old, and project information that is preliminary at best, we believe that the financial projections for both capital and operating expenses are insufficient to meet the needs of the park.

We recommend that the final GMP should include:

- a) **Sufficient resources.** Justification for funding at levels sufficient to provide sufficient staffing and other resources to fully support the planning and management of the park and its programs;
- b) **Deferred maintenance.** Disclosure of all deferred maintenance requirements (and annual funding for deferred maintenance) over the 20 years of the GMP planning horizon; and
- c) **FY2004 S.** Update financial data in the report with fiscal year 2004 dollars (instead of 2001).

*At this point in our recommendations we introduce three crucial topics not included in the GMP:*

### 7. Prohibit cell towers

The towers that have been placed in the park were extremely controversial, and led to a court suit challenging their environmental impacts. The presence of these towers has already had a deleterious impact on the scenic qualities of the park, and no further towers should be permitted. This should be addressed in the final GMP and federal legislation--see 9 (f) below.

### 8. Partnerships

The GMP provides no guidance or direction for park management to use in developing partnerships with other governmental and non-governmental entities. To offset inadequate Federal resources, to encourage support for Rock Creek Park, and to increase involvement in its future, the Committee of

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Comments on the Rock Creek GMP - Committee of 100

July 15, 2003

100 urges the establishment of a wide range of public-private partnerships. Such partnership have produced excellent results for many communities and national parks throughout the nation, such as Golden Gate National Recreation Area in San Francisco; Gateway NRA in New York City; and Cuyahoga Valley National Park between Akron and Cleveland, Ohio.

The Washington DC area offers a rich array of possible partnerships to benefit Rock Creek. These could include:

- a) **Agencies.** Partnerships with local (e.g., DC Parks and Recreation, Schools, DDOT), state (MD, VA), and federal agencies (EPA, USDA etc.) to share resources, outreach, communications, cross training, and joint programs;
- b) **Conservancy.** Creation of a Rock Creek Conservancy to support fundraising, promotion, and partner programs for the park--see 9 (b) below;
- c) **Advisory Committee.** Establishment of a citizens advisory committee to advise on matters relating to all the national park units located within Washington, DC see 9 (c) below; and,
- d) **Universities and Schools.** Cooperative agreements with local universities and schools for research, study, and support of park programs.

**9. Federal legislation**

We believe that the Rock Creek Management Plan can be the impetus for creating a model program for urban park management in the Nation's Capital. To implement our recommendations, however, some federal legislation will be required

We strongly suggest that legislation be drafted to accomplish the following:

- a) **Sufficient funds.** Appropriate sufficient funds for park operations, maintenance, and construction to implement the Plan;
- b) **Conservancy.** Create a Rock Creek Conservancy to bring private sector advocacy and funding to enhance limited federal resources in the protection, promotion and enjoyment of all the park units administered as part of Rock Creek Park;
- c) **Citizens Advisory committee.** Create a National Capital Region Citizens Park Advisory Committee appointed to reflect the range of national and local interests, and with geographic and demographic representation, which can provide an ongoing mechanism to review and advise on the management of all the national park units within Washington DC;
- d) **User Fee.** If the studies prove this to be feasible, establish a user fee for travel through the most heavily trafficked portions of Rock Creek Park and Parkway during commuting hours and ensure that those funds are earmarked to support Rock Creek initiatives and programs to benefit the public;
- e) **Elevated grade levels.** Elevate the grade requirement of the Superintendent of Rock Creek to a minimum level of Grade 15 or Senior Executive Service (SES); and
- f) **Prohibit cell towers.** Prohibit any additional cell towers or similar intrusions in any location within the park.

**Conclusion**

We do not view this as the end of our recommendations, but the beginning of a working relationship with the National Park Service. The Committee of 100 offers a positive voice about what should happen. We will focus our efforts on bringing people together to move the process along and stay involved. These recommendations target studies and actions that will improve decision-making over the years and take the process to the next steps for implementation.

**CRESTWOOD NEIGHBORHOOD LEAGUE**

**4600 Blagden Terrace NW  
Washington, DC 20011  
(202) 291-3203**

May 23, 2003

**Ms. Adrienne Coleman, Superintendent  
Rock Creek Park, NPS  
3545 Williamsburg Lane NW  
Washington, DC 20008**

Dear Ms. Coleman:

**Please accept my appreciation for the opportunity to comment on the Rock Creek Park General Management Plan at the public hearing on May 22, 2003, at the University of the District of Columbia. My written comments are attached.**

**I am also providing you a copy of the resolution that the Crestwood Neighborhood League adopted at its public meeting on May 12, 2003. This resolution also supports Alternative B, which proposes no actions or changes to the current free access to Beach Drive at all times during the week.**

Sincerely,  
  
**James H. Jones, President  
Crestwood Neighborhood League**

Attachments

BY: \_\_\_\_\_

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Page 3 of 5**CRESTWOOD NEIGHBORHOOD LEAGUE**  
May 12, 2003**RESOLUTION**

*Opposing any and all options in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic*

**WHEREAS**, The Environmental Impact Statement and General Management Plan evaluates the following four alternatives for Rock Creek Park: (1) **Alternative A** would generally retain the current scope of visitor uses with improvements in visitor safety, better control of traffic volumes and speeds through the Park; (2) **Alternative B** would propose no actions at all; (3) **Alternative C** proposes to close three sections of Beach Drive to automobiles at all times and, thereby, eliminate traffic in much of the northern part of the Park; (4) **Alternative D** proposes to close three segments of Beach Drive in the northern portion of the Park to motorized vehicles for a 6-hour period, from 9:30 a.m., to 3:30 p.m., on weekdays.

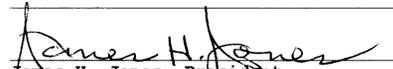
**WHEREAS**, **Alternative D**, which only completely opens Beach Drive during rush hours, has an unfair discriminatory effect in that on the one hand, it would allow access through the Park to commuter traffic during rush hour; however, on the other hand, it would prohibit access both through and across the Park to local residents during non-rush hour times. This alternative would have a further adverse effect on local residents both east and west of the park because residents would no longer be able to traverse the Park through local streets as is customary, but would be forced to go miles out of their way, even into Maryland in order to reach either side of the Park.

**WHEREAS**, **Alternatives C and D** prohibit access to Beach Drive from most roads and increase traffic on streets that are already heavily trafficked such as 16<sup>th</sup> Street NW, 14<sup>th</sup> Street NW, Military Road, Piney Branch Parkway and 13<sup>th</sup> Street, Park Road, and Blagden Avenue.

**WHEREAS**, The proposal, by prohibiting automobile access to the park, creates a public safety hazard in that it blocks access to emergency first responders and law enforcement agencies in addition to depriving residents of access to emergency evacuation routes at Rock Creek Parkway and George Washington Parkway.

**WHEREAS**, The proposal, by prohibiting automobile access to the park, benefits the young and mobile but penalizes many Seniors, the handicapped, small children and others with mobility challenges from using the park.

**THEREFORE, BE IT RESOLVED**, That Crestwood Neighborhood League opposes any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic; and supports **Alternative B** in the General Management Plan which proposes no actions or changes at all to the current free access to Beach Drive at all times during the week.

  
James H. Jones, President  
Crestwood Neighborhood League

**NATIONAL PARK SERVICE PUBLIC HEARING ON THE ROCK CREEK PARK GENERAL MANAGEMENT PLAN**  
May 22, 2002**STATEMENT OF JAMES H. JONES,**

My name is James H. Jones. I am the President of the Crestwood Neighborhood League, a community that abuts and includes Rock Creek Park. I am also the Chairman of the Advisory Neighborhood Commission 4A. While both organizations adopted resolutions to oppose any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic, I am here tonight to represent the Crestwood Neighborhood League.

I feel that the General Management Plan as presented is a Simulation and does not fully disclose the objectives that the National Park Service is attempting to attain.

The name of the Simulation : Access Control

The purpose: To gain control over the roadways and throughways in Rock Creek Park  
The Players: Those Favoring an Open system vs. Those Favoring the Bicycle System

**OPEN SYSTEM:** When Congress defined and dedicated Rock Creek Park in 1890, it established an Open System with roadways for the purpose of driving, bridle paths for horseback riding, and footways for pedestrians. Proponents of the Open System believe that the park exists for the benefit and enjoyment of all people: young, old, mobility challenged, cyclists and motorists alike; and that the value of the park's scenery depends on making it conveniently accessible to the people. Proponents of the Open System include Residents, community organizations, Advisory Neighborhood Commissions, commuters, enlightened government officials, and others.

**BICYCLE SYSTEM:** Proponents of the Bicycle System represent special interests and favor restricting the use of Park roadways to bikers which limits access to Rock Creek Park. The restrictions imposed by this group would benefit a few at the expense of the many. That is, the limitations would serve the needs of special interests, and wrongly exclude the majority of park users, including senior citizens, the young, and the physically challenged. The proposed restrictions also create public safety concerns, and unfairly burden the surrounding neighborhoods and communities with increased traffic. Proponents of the Bicycle System are the Peoples Alliance for Rock Creek Park (PARC), Washington Area Bicyclist Association, the National Parks and Conservation Association (NCPA) AND THE NATIONAL PARK SERVICE, itself as evidenced by its preferred choice of **Alternative D** in the General Management Plan. This Alternative proposes to close three segments of Beach Drive in the northern portion of the Park to motorized vehicles for a 6-hour period, from 9:30 a.m., to 3:30 p.m., on weekdays.

The game did not start today, it did not start even 7 years ago at the beginning of this General Management Plan. The struggle to control access to the roadways in Rock Creek Park began in the early 1960s with the resurgence in the popularity of bicycles as a mode of transportation. At that time the proponents of the Bicycle System began to lobby and influence the policies of the National Park Service.

Rock Creek Park management made its first special effort to accommodate the Bicycle System by reserving Ross Drive for bicycle use and prohibiting automobiles. In 1966, the section of Beach Drive from Joyce Road to Broad Branch Road was limited to bicycle and pedestrian traffic on Sunday mornings and later extended to Morrow Drive. By that fall, about 3 ½ miles of trail north of the Nature Center had been surfaced for bicycle use.

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However, it was found that the bicycle use on the closed roads did not justify their closure. The motorists complained, applied pressure on park officials. The roads were soon reopened to automobiles.

In the 1970s the Bicycle System prevailed even more upon NPS in their effort to gain control of Park roadways. They were successful in getting the NPS to set aside one lane of the Rock Creek and Potomac Parkway north of Virginia Avenue for a week to promote commuting by bicycle in lieu of automobiles.

This experiment resulted in massive traffic tie-ups with severe inconvenience to the great majority of parkway users who were unwilling or unable to shift to bicycles. The experiment failed. The lane closure was discontinued. However, NPS compromised with the Bicycle System by paving over the existing bridle trails between Connecticut and Virginia avenues for bicycle use and completing paved bicycle trails north along Beach Drive to Broad Branch Road and from Joyce Road north to near the Maryland line.

The NPS made its most significant concession to the Bicycle System in its *Statement for Management* prepared in 1977. In this document, the National Park Service listed as an objective: "To improve the quality of the visitor's experience by reducing excessive automobile commuter traffic on roads within Rock Creek Park, and encourage the shift of such traffic to mass transit, bicycle, and other forms of transportation."

In line with this objective, NPS in 1980 studied nine alternatives for completing the Bicycle System. Alternative 1: to build 5 ½ miles of new bicycle trail paralleling Beach drive and having no impact on auto traffic. Alternative 9: major section of Beach would be permanently converted to bicycles use only, eliminating Beach Drive as a through route for automobiles.

In March, 1981, PARC (Michael A. Replogle) advanced a tenth alternative: to permanently close Beach Drive to through traffic both above and below Joyce Road as soon as the Metro subway system was opened to the Van Ness station on Connecticut Avenue.

In March 1983, at the urging of PARC and other Bicycle System proponents, NPS advanced the following three-phase program:

Phase 1: Portions of Beach Drive above Joyce Road would be closed to cars on weekends and holidays during the warm months.

Phase 2: One lane of Beach Drive south to Broad Branch Road would be reserved for cyclists and joggers during weekday rush hours, allowing cars the other lane in the prevailing rush hour direction.

Phase 3: After 1985, when the Metro Red Line was to be completed beyond Van Ness and reconstruction work on 16<sup>th</sup> Street was to be finished, a gate would be placed near Boulder Bridge permanently barring that section of Beach Drive to automobiles.

- 3 -

This 1985 plan as expected was opposed by infuriated residents, automobile commuters and city officials who exerted their influence on Manus Fish, the then NPS director. This time, the compromise solution was the weekend closing on upper Beach Drive between Picnic Area 10 and Wise Road and between West Beach Drive and the Maryland line. A 2 1/2 mile bicycle trail paralleling that segment of Beach drive was proposed. However, the opposition to the new bicycle path and its costs remain even today as obstacles to its construction.

The General Management Plan that we are addressing today is a continuation of an effort by the Bicycle System to gain control of the Park's throughways for bicycle use. The Cyclists have made rapid gains and influence over the years.

However, I think it would be a serious mistake for the NPS to use the General Management Plan as the vehicle to disguise its selection of the Bicycle System over the Open System. I urge NPS officials not to make that mistake.

The alternatives in the plan that support the Bicycle System have tremendous disadvantages:

1. Alternative D which only completely opens Beach Drive during rush hours, has an unfair discriminatory effect in that on the one hand, it would allow access through the Park to commuter traffic during rush hour but would prohibit access through the park during non-rush hour times when local residents need access to the roadway.

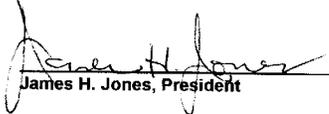
Further, by prohibiting automobile traffic, the alternative benefits the young and mobile but penalizes many Seniors, the handicapped, small children and others with mobility challenges who depend on the automobile from using the park.

*Alternatives C and D* prohibit access to Beach Drive from most roads and increase traffic on streets that are already heavily trafficked such as Blagden Avenue, 16<sup>th</sup> Street NW, 14<sup>th</sup> Street NW, Military Road, Piney Branch Parkway and 13<sup>th</sup> Street, Park Road, etc.

*These alternatives create safety hazards* in that access is blocked to emergency first responders and law enforcement agencies in addition to depriving residents of access to emergency evacuation routes.

Based on these factors, I oppose any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic. I support Alternative B in the General Management Plan which proposes no actions or changes at all to the current free access to Beach Drive at all times during the week.

In addition, I recommend that NPS implement the alternative proposed in the 1980 study of alternatives for completing the Bicycle System. That alternative proposed to build 5 ½ miles of new bicycle trail paralleling Beach drive and having no impact on auto traffic. However, if the north end of Beach Drive is not environmentally suited for the trails, then Oregon Avenue presents an option to consider.

  
James H. Jones, President

Comments on the Draft General Management Plan/Environmental Impact Statement, Rock Creek Park and Rock Creek and Potomac Parkway July 14, 2003

Submitted by Steven Donkin, Ph.D. - For the D.C. Statehood Green Party 1708 New Jersey Ave., NW Washington, D.C. 20001

Former environmental consultant and risk assessor; current D.C. public school science teacher

### INTRODUCTION

I and the D.C. Statehood Green Party appreciate the opportunity to comment on the National Park Service's Draft General Management Plan/Environmental Impact Statement, Rock Creek Park and Rock Creek and Potomac Parkway. I am a resident of the District of Columbia, and am submitting these comments on behalf of myself and the D.C. Statehood Green Party, which has a current registered membership of over 4,700 D.C. residents. This testimony has been approved by the general membership of the Party, and therefore should be construed as reflecting the official position of the Party

My own credentials include a Ph.D. in biology with an emphasis on environmental health from the Georgia Institute of Technology, and post-doctoral studies in environmental toxicology at the University of Georgia. I have taught college-level biology for two years, spent seven years as a consultant on environmental health and ecological risk assessment, and I currently teach high school biology, chemistry and environmental science in the D.C. public school system.

### D.C. STATEHOOD GREEN PARTY ENDORSEMENT OF PLAN C: NONMOTORIZED RECREATION EMPHASIS

I and the membership of the D.C. Statehood Green Party urge the National Park Service (NPS) to adopt Alternate Plan C: Nonmotorized Recreation Emphasis. We feel that this plan comes closest to fulfilling the congressional mandate to preserve Rock Creek Park as a "public park or pleasure ground for the benefit and enjoyment of the people of the United

States" as specified in the park's establishing legislation. In our opinion, the other three proposed plans do not address all the facets of park management in their proper balance.

Alternate Plan A: Improved Management of Established Park Uses (e.g., Motorized Recreation Emphasis), and Alternate Plan B: Continue Current Management/No Action, are clearly not in fulfillment of the Park Service's stewardship mandate and were properly discarded as options in the NPS draft document. However, we disagree with the Park Service's endorsement of Plan D: Mid-Weekday Recreation Enhancement, for the reasons stated below.

### CRITICISM OF NPS ENDORSEMENT OF ALTERNATE PLAN D

Mid-Weekday Recreation Enhancement The Park Service's endorsement of Alternate Plan D: Mid-Weekday Recreation Enhancement, proposed as a compromise by the D.C. Mayor's office, is a misguided attempt to provide a politically-driven solution which (as most decisions driven primarily by politics do) tries to please everyone at once while not addressing the core challenges. As an urban wilderness area which has evolved over the years into a major automobile commuter route, Rock Creek Park is being overrun by cars whose presence in the park has nothing to do with its original purpose as a recreation area and wilderness preserve. To most of these car drivers, Rock Creek Park is not a destination to be appreciated for itself but rather a place to get through on their way to somewhere else. Balancing the needs of motorized commuters with those of nonmotorized visitors along Beach Drive, as well as with the needs of resident wildlife which must negotiate through constantly changing traffic patterns, is simply not possible with a convoluted plan of alternating openings and closures of the road throughout the week. Only a complete closure of upper Beach Drive will remove the inevitable confusion to both humans and wildlife about when it would and when it would not be safe to traverse Beach Drive.

In addition, the draft document suffers from logical inconsistencies that are confusing to the reader. For instance, the Park Service states that Plan D would close several segments of Beach Drive to motorized traffic during the middle (non-rush hour) part of weekdays. These segments are currently closed to motorized traffic on the weekends. However, on page 29 of the

draft document, the Park Service states that an earlier suggestion from the public to "Allow motorized traffic on portions of Beach Drive only during weekday rush hours" was excluded from consideration for the following reasons:

"It would double the burden for barrier placement and removal on the U.S. Park Police"; "It would restrict the access throughout the park that visitors with limited mobility have during weekday evenings and would eliminate driving for pleasure except during rush hours"; and "Variable opening and closing times would be confusing and difficult to implement."

How can the Park Service advocate on one page against partial road closure during odd hours based on the above objections, then state on another page its endorsement of a plan that calls for partial road closure during odd hours?

#### **OTHER CRITICISMS OF THE DRAFT DOCUMENT**

In its discussion of the impacts of Plan C on traditional park character and visitor experience, the Park Service states that "Permanent closure of sections of Beach Drive would eliminate the traditional visitor experience of automobile touring along the length of the park" (page 232). "This would be a major adverse impact on the traditional visitor experience," says the Park Service.

However, automobile touring was not specified as a use for the park in its establishing legislation of 1890 (before automobiles were available). There is no mandate that automobile touring be provided for in Rock Creek Park, and in fact such access could be replaced by a well-run system of public transit, pedestrian and bicycle access.

Also, on page 142 of the draft document, it is stated that between 1991 and 1997, out of a total of 14,464,000 annual visitors to the park, 12,389,000 were "Nonrecreational (commuters)" and only 2,075,000 were "Recreational." I assume that most people would consider automobile touring to be a recreational rather than commuter activity. If that is the case, then how can closing Beach Drive and eliminating automobile touring be considered a "major impact on the traditional visitor experience" if 84%

of visitors are in fact nonrecreational commuters? According to the Park Service's numbers, the current traditional visitor experience appears to be commuting through the park to get to work, not automobile touring in order to enjoy the scenery.

As an environmental impact statement, the draft document provides an excellent and thorough description of some projected impacts of the various plans, particularly in the areas of watershed impacts, effects of traffic patterns, and impacts on historic/archeological sites. However, other sections are distressingly sparse and uninformative in their descriptions of impacts. Various traffic-calming measures that NPS "may" implement are repeatedly mentioned, for instance, but the reader is left with a sense that, due to unpredictable funding or other policy issues, none of these measures may in fact ever see the light of day. Any plans to address the constant problem of surface runoff and other non-point source pollution associated with allowing car traffic through the park are also only vaguely described. The document mentions the awareness by NPS that the endangered Hays spring amphipod resides in the park and thus requires special protections, but those protections are not detailed. Also, this amphipod was only recently discovered in Rock Creek Park in 1998. What measures are being taken by NPS to better inventory park wildlife and thus ensure the protection of other, perhaps as yet undiscovered, species within the park?

The Draft Management Plan/Environmental Impact Statement, while clearly reflecting a great amount of effort by the Park Service in its preparation, unfortunately suffers from a number of smaller inadequacies as well. Among the relatively minor shortcomings are the numerous typographical errors (perhaps reflecting budget or time constraints which disallowed proper copy editing) and the fact that the phone number provided in the document "For more information concerning this plan" (202-282-1063) was disconnected when I called it. The existence of these errors does not boost the reader's confidence that all the material within the document has been thoroughly reviewed.

#### **CONCLUSION**

When I was young, the community swimming pool in our neighborhood had a sign: "We don't swim in your toilet; please don't pee in our pool."

The National Park Service should adopt a similar slogan for the parks it oversees. For instance, on behalf of the nonmotorized recreational visitors: "We don't recreate in the freeway, so please don't commute through our parks." Or on behalf of the animal inhabitants: "We don't reside in your roads, so please don't drive through our homes." A national park should simply not be used as a commuter thruway. This has never been the intended use of our parks, and it certainly was not the original intended use of Rock Creek Park as outlined in its establishing legislation.

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In addition to removing commuter automobile traffic from this sensitive area, the Park Service should expand the visitor experience by making the improvements specified in Plan C, as well as providing transit within the park to improve access. Other national parks are taking steps toward banning cars within park boundaries and replacing car access with shuttle services, including trolley and light rail. With these improvements, the Park Service's concern regarding the limiting of the "automobile touring" experience may be adequately addressed. Rather than giving the highest priority to privately owned, motorized traffic, with occasional concessions to nonmotorized visitors, the Park Service should be emphasizing nonmotorized use of the park first. After upper Beach Drive is permanently closed to automobiles, thereby restoring the park to its intended use, the Park Service may, if it chooses, make a few concessions to the automobile. One idea may be a one-day opening of Beach Drive to cars in the spring and fall so that motorists may enjoy the changing seasons.



## Elsie Whitlow Stokes Community Freedom Public Charter School

May 23, 2003

Superintendent, Rock Creek National Park  
3545 Williamsburg Lane  
Washington, DC 20008

Dear Superintendent,

I am writing in support of the proposal to close the roads in Rock Creek Park to car traffic during the weekday hours of 9:30 a.m. – 3:30 p.m. The closure of these roads during school hours would greatly benefit the students at our elementary school.

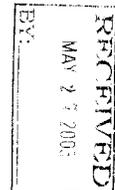
I am an avid bike rider and hiker and enjoy using the park during the evenings and weekends. I mostly enjoy sharing Rock Creek Park with my students at the Elsie Whitlow Stokes Community Freedom Public Charter School. Our location at 16<sup>th</sup> and Park Rd., NW is ideally suited to visiting the Park frequently. We currently go hiking on a weekly basis. We have the ability to do a bicycling and handcycling program and I foresee adding rollerblading as well, however we do not have a safe traffic-free space to do the program. Closing the roads during school hours would be ideal for our students to bike and blade safely and get the exercise they so desperately need.

The epidemic of childhood obesity is well documented. The aim of our school's PE program is excite children and their families to fitness and to develop a life-long love of the outdoors and recreation. Closing Rock Creek Park during school hours would help further our school's goals as well as the goal of the National Parks.

As a charter school we are proud of the educational opportunities we can offer to our students, but our space is severely limited. Closing Rock Creek Park would create a safe classroom for our students to learn bicycle safety and rollerblading. There are many other public and private schools in the local Northwest area and in the city at large that would utilize the Park during school hours. Let's give the Park back to the people and the children who will grow up remembering their days in the Park fondly and keep it protected for years to come.

Thank you,

Carol Minder  
PE teacher  
Elsie Whitlow Stokes Community Freedom Public Charter School



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ROCR 2857  
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Subject: Support Rock Creek proposal  
Dear Park Service:

I am strongly in support of the proposal to close off Beach Drive for six hours a day. Rock Creek Park is a National Park, never intended to be a local commuter way, and I believe it is high time that as much as possible of its natural beauty and wildlife habitat should be restored to at least a semblance of the peace and quiet that one would expect of a national park.

I have lived west of the Park for the past 30 years, and often commute through Beach Drive on my way to work downtown. But I would gladly give it all up for the knowledge that this beautiful part of the Park was at last car-free even for just a few more hours a day, knowing that it was at last being managed for wildlife and quieter forms of recreation, as it is on weekends.

I frankly find it difficult to believe the arguments that such a closure will somehow cause "gridlock" in adjoining neighborhoods. For Pete's sake-- this is a non-rush hour closure! I know from experience, since I live in one of those neighborhoods, that hardly anyone is around at all in them during the day, and certainly very little car traffic.

Please do the right thing by this great Park and stick to your original proposal.

Sincerely,

Brock Evans

Brock Evans, Executive Director  
Endangered Species Coalition  
1101 14th St, NW, Ste. 1001  
Washington, D.C. 20005

**OFFICERS**  
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Francis M. Clarke, III  
3317 Cleveland Avenue, N.W.  
Washington, DC 20008  
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Ann Leisow  
*Second Vice President*  
Carroll Green  
*Secretary*  
Jane A. McNew  
*Treasurer*  
Allen E. Beech

*Federation of Citizens Associations  
of the District of Columbia*

ORGANIZED MARCH 5, 1910 • INCORPORATED JUNE 3, 1940

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June 25, 2003

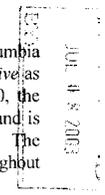
Mr. John G. Parsons  
Associate Regional Director  
National Park Service  
1100 Ohio Drive SW  
Washington, DC 20242

Ms. Adrienne A. Coleman, Superintendent  
Rock Creek Park  
National Park Service  
3545 Williamsburg Lane NW  
Washington, DC 20008-1207

RE: ROCK CREEK PARK DRAFT GENERAL MANAGEMENT PLAN/ENVIRONMENTAL  
IMPACT STATEMENT

Dear Mr. Parsons and Ms. Coleman:

At its meeting on June 24, 2003, the Federation of Citizens Associations of the District of Columbia ratified the vote of the Executive Board to support *Alternative B, the No Action Alternative*, as outlined in the draft General Management Plan of Rock Creek Park. Organized in 1910, the Federation of Citizens Associations serves as a coordinating body for citizens' interests, and is committed to bringing the voice of District taxpayers and residents to policy discussions. The Federation has a membership of 40 civic associations representing thousands of residents throughout the District of Columbia.



The Federation is impressed that member civic associations and Advisory Neighborhood Commissions on both sides of Rock Creek Park identify *Alternative B* as their preferred alternative in the draft General Management Plan. Further, the Federation's endorsement of *Alternative B* is in reaction to *Alternative C* and *Alternative D* which propose to close sections of Beach Drive to automobile traffic at all times and during non-rush hour, respectively. The Federation opposes all options that propose to close Beach Drive to automobile traffic for many reasons. Senior citizens and handicapped require weekday vehicular access to upper Beach Drive. Motorists want to continue using Beach Drive as a scenic and convenient route through Rock Creek Park. Further, Beach Drive handles up to 2,500 vehicles daily and residents on both sides of the Park do not want this traffic diverted into their neighborhoods. In addition, the draft Environmental Impact Statement, itself, states that a Beach Drive closure would have negligible effects on rush hour traffic volume, air and water quality, and on reductions in mortality for all park species.

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Parsons / Coleman  
25 June 03  
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Mayor Williams has indicated that the closure of Beach Drive will interfere with recently developed emergency evacuation plans. It is more than apparent from this data that there is no consensus to close Beach Drive. Therefore, the Federation urges the National Park Service to select *Alternative B, the no action alternative*.

Sincerely,

  
Francis M. Clarke, III  
President

- cc: Congresswoman Eleanor Holmes Norton
- Mayor Anthony Williams
- City Council Chairperson Linda W. Cropp
- Councilmember Jack Evans
- Councilmember Harold Brazil
- Councilmember David A. Catania
- Councilmember Phil Mendelson
- Councilmember Carol Schwartz
- Councilmember Jim Graham
- Councilmember Kathleen Patterson
- Councilmember Adrian Fenty
- Councilmember Vincent Orange, Sr.
- Councilmember Sharon Ambrose
- Councilmember Kevin Chavous
- Councilmember Sandra Allen
- Michael F. Byrne



"Friends of Open Parkways"  
 <friends@openparkways.org>  
 07/09/2003 07:31 AM  
 AST  
 Please respond to "Friends of Open Parkways"

To: <Undisclosed-Recipient;>  
 cc: Federation of Citizens Association Support Alternatives.org



Friends of Open Parkways

### PRESS RELEASE

July 9, 2003

#### Federation of Citizens Association Support Alternative B

For more information, visit our website at [www.openparkways.org](http://www.openparkways.org)

The Federation of Citizens Associations of the District of Columbia support Alternative B, the No Action Alternative as outlined in the draft General Management Plan of Rock Creek Park. The Federation has a membership of 40 civic associations representing thousands of residents throughout the District of Columbia. A letter was sent on June 25, 2003, to Mr. John Parsons and Ms. Adrienne Coleman of the National Park Service. See letter below.



June 25, 2003

Mr. John G. Parsons  
 Associate Regional Director  
 National Park Service  
 1100 Ohio Drive SW  
 Washington, DC 20242

Ms. Adrienne A. Coleman, Superintendent  
 Rock Creek Park  
 National Park Service  
 3545 Williamsburg Lane NW  
 Washington, DC 20008-1207

RE: ROCK CREEK PARK DRAFT GENERAL MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Parsons and Ms. Coleman:

At its meeting on June 24, 2003, the Federation of Citizens Associations of the District of Columbia ratified the vote of the Executive Board to support *Alternative B, the No Action Alternative* as outlined in the draft General Management Plan of Rock Creek Park. Organized in 1910, the Federation of Citizens Associations serves as a coordinating body for citizens' interests, and is committed to bringing the voice of District taxpayers and residents to policy discussions. The Federation has a membership of 40 civic associations representing

thousands of residents throughout the District of Columbia.

The Federation is impressed that member civic associations and Advisory Neighborhood Commissions on both sides of Rock Creek Park identify *Alternative B* as their preferred alternative in the draft General Management Plan. Further, the Federation's endorsement of *Alternative B* is in reaction to *Alternative C* and *Alternative D* which propose to close sections of Beach Drive to automobile traffic at all times and during non-rush hour, respectively. The Federation opposes all options that propose to close Beach Drive to automobile traffic for many reasons. Senior citizens and handicapped require weekday vehicular access to upper Beach Drive. Motorists want to continue using Beach Drive as a scenic and convenient route through Rock Creek Park. Further, Beach Drive handles up to 2,500 vehicles daily and residents on both sides of the Park do not want this traffic diverted into their neighborhoods. In addition, the draft Environmental Impact Statement, itself, states that a Beach Drive closure would have negligible effects on rush hour traffic volume, air and water quality, and on reductions in mortality for all park species. Mayor Williams has indicated that the closure of Beach Drive will interfere with recently developed emergency evacuation plans.

It is more than apparent from this data that there is no consensus to close Beach Drive. Therefore, the Federation urges the National Park Service to select *Alternative B*, the no action alternative.

Sincerely,

Francis M. Clarke, III  
President

**c c: Congresswoman Eleanor Holmes Norton  
Mayor Anthony Williams  
City Council Chairperson Linda W. Cropp  
Councilmember Jack Evans  
Councilmember Harold Brazil  
Councilmember David A. Catania  
Councilmember Phil Mendelson  
Councilmember Carol Schwartz  
Councilmember Jim Graham  
Councilmember Kathleen Patterson  
Councilmember Adrian Fenty  
Councilmember Vincent Orange, Sr.  
Councilmembber Sharon Ambrose  
Councilmember Kevin Chavous  
Councilmember Sandra Allen  
Michael F. Byrne**

MR. CLARK: My name is George Clark, where for the last 25 years I've lived one block from Rock Creek Park. I'm here to testify tonight as President of the Forest Hills Citizens Association. As David Bardin said, we're in Forest Hills right now. Forest Hills, the eastern border is Broadway and Rock Creek Park and all the way along that area, and that's something that I want to talk about a lot. We've heard, in fact, that—about the environmental effects, the Park Service has says there really isn't a difference in environmental effects among the options. I think there is. And I think alternative B is one that prevents adverse environmental effects for the reasons that I'll explain. And alternative B is what the citizens association supports.

We've heard a lot of talk and we see it in the report about well, we won't really have any traffic going into the local neighborhoods. Don't worry it's really going to be all right. But we don't see any analysis of that.

At the same time, we see that there will be 20 percent less traffic between Joyce Road, along Beach Drive down to Broad Branch Road. Well, where does that 20 percent of traffic going to go? It's going to go to 16<sup>th</sup> Street some, it's going to go to Broad Branch Road a lot. And what doesn't go to those places is going to go through Forest Hills. And when it goes through Forest Hills, it's going to go through two places. One it's going to come where Gates Road extended goes through and goes up Davenport Street, which you've ever ridden on that, is a twisty curving road with no visibility, one and a half lanes, no curves, no sidewalks, nothing. This is not a route that you want to send cars on.

The same thing is true on Brandywine Street which, in the winter you don't want to go up at all when it snows. There are severe effects.

Now, where does everybody go along Broad Branch Road? Broad Branch Road is interesting. Because it would become the principal alternative to the closed sections of Beach Drive. Tonight I think I've heard some people kind of assume that Broad Branch Road is part of Rock Creek Park. Well, we know it ain't. It's a city road. It's not part of the park. Although when you drive along it, it looks like it is, which is one of the wonderful things about it. That's one of the things we've worked on with the Park Service and the citizens association with tree and slope, the overlays, just for that reason.

Broad Branch Road is heavily traveled between Linean and Beach Drive. Broad Branch Road is surrounded by trees on both sides with no shoulders, many tight curves, narrow lanes and blind and semi-blind intersections, one of them comes out of the alley at the bottom of my house so I know what's that like.

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Although the management—the draft plan acknowledges that there will be increased traffic along Broad Branch Road, it makes no analysis of the consequences. Three years ago the city proposed rebuilding Broad Branch Road. And what did it say it wanted to do? It said it wanted to raise the road level 7 feet, it wanted to jersey barriers on both sides, it wanted to increase the speed limit and what was it going to do? It was going to take down at least 120 mature trees in order to do that. Now, fortunately, the local citizens an ANC-3F got that stopped. But that plan is coming back when we start to put more traffic down Broad Branch Road. And that's what I say that the Park Service should think about that, what will be the consequences be on those roads that will be taking the commuter traffic. Because there will be adverse effects and those adverse effects for Broad Branch Road will be felt right next to the park because we know that those little stakes that say where the park border is right along Broad Branch Road.

I also think that the recreational games promised in the management plane are speculative at best and let me say that based on 25 years of experience of walking, running, bicycling and driving along these roads, literally thousands of times. And right now I walk along the closed section of Beach Drive every Sunday. So my experience is current. And this is what I hear when I talk to people in Forest Hills. I think that the views are what I'm about to say here.

Certainly bicycling in this area is not a sport free of danger from those who are walking along or pushing their baby along Beach Drive. Indeed, my observation is that facing a pack of 100 or more riders racing at high speed around a blind hairpin turn while you are having a pleasant walk is a far more dangerous and frightening experience than seeing a single car moving at the speed limit. And I think we've all got to wonder whether there will be significant increases in recreational uses at 2:00 p.m. on cold January afternoons.

Likewise, school field trips will not be arriving at 9:30 in the morning or staying until 3:00 p.m.

The assumption is that if I want to drive from Bethesda to visit a sick friend over in Ward 4, then I'm a commuter and I should be banned. And I don't think that's right.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

Subject: Comments of Forest Hills Citizens Association re Rock Creek Park GMP

Dear Superintendent Coleman:

Attached are the comments of the Forest Hills Citizens Association in favor of Alternative B of the proposed General Management Plan for Rock Creek Park. As you know, Forest Hills forms the western border of the lower area of Beach Drive that is proposed for weekday closing under Alternative D. Forest Hills is also home to all or part of 3 more National Parks, including Soapstone Valley, Melvin Hazen Park and Fort Circle Park. Because of our proximity to these treasures, we are particularly concerned with their use and preservation.

George R. Clark  
President  
Forest Hills Citizens Association  
4401-A Connecticut Ave., N.W. #209  
Washington, D.C. 20008  
president@foresthillsdc.org

Statement of Forest Hills Citizens Association Concerning Rock Creek Park and the Rock Creek and Potomac Parkway Draft General Management Plan In Support of Alternative B

July 15, 2003

The Forest Hills Citizens Association ("FHCA") recommends that the Park Service adopt Alternative B (the status quo). FHCA sees the Preferred Alternative D as fundamentally flawed, for reasons detailed below. Moreover, we believe that a significant alternative has not been explored at all. This alternative received favorable comments during the hearings. That alternative is to complete a bike path on Beach Drive between Broad Branch Road and Military Road, as has been discussed in the past.

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Forest Hills borders Rock Creek Park along the entire Eastern side of the neighborhood, and borders Melvin Hazen Park as well. Forest Hills also includes Soapstone Valley Park, and parts of Fort Circle Park, so we are anxious to promote and protect our National Parks. And FHCA, which will be 75 years old next year, knows the value of Rock Creek and the other local national parks. It has worked successfully with the National Park Service (“NPS”). In 2002 it filed a petition with the DC Zoning Commission for a Tree & Slope Overlay, largely to help protect the Park, which borders so much of Forest Hills. Forest Hills includes UDC, where the public hearings were held on the Draft General Management Plan (“GMP”).

First, we note that the NPS found "that all four alternatives would have fairly similar effects on air quality, the water quality and hydrology of Rock Creek and its tributaries, wetlands and floodplains, deciduous forests, and protected and rare species." The principal differences among the plans is traffic. Thus environmental concerns played no real role in the decisionmaking. But they should have, because only Alternative B prevents certain adverse environmental effects, as will be explained in full.

Second, the GMP states that "nearby street intersections would be operating well below their capacities during the mid-day period.... While the diverted the mid-day traffic would be perceptible on some city streets, it would not cause any changes in levels of service or in traffic-related community character." At the same time it says that there would be a 20% reduction in traffic along Beach Drive between Joyce Road and Broad Branch Road. That 20% of traffic has to go somewhere. The logical places for it to go are first, along Broad Branch Road, and second through Forest Hills to Connecticut Avenue. Both of these problems have received insufficient consideration under the GMP, which is based on a long-outdated traffic study (1990). The model to which that data is then applied "has [not] been developed and validated . . . [for] corridor studies such as the Rock Creek Park project."

The GMP says even less about where northbound traffic will go. All of the alternatives except Alternative B would cause increased traffic along Broad Branch Road. Broad Branch Road would be the principle alternative to the closed sections of Beach Drive, especially for northbound traffic, since this

would be the initial closure point. Although Broad Branch Road looks and meanders like a park road, it is a city street.

Broad Branch Road is already heavily traveled. Between Linnean Avenue and Beach Drive, Broad Branch Road is surrounded by trees on both sides with no shoulders, many tight curves, narrow lanes and blind or semi-blind intersections. One of the three streets leading out of the park from Broad Branch is narrow with many twists and curves and steep hills, no curbs – and is only 1.5 lanes wide (Davenport Street). A second contains a steep hill that can be dangerous in winter weather (Brandywine Street). The third crosses a one lane bridge and moves steeply uphill around sharp curves (27th Street).

The GMP acknowledges that there will be increased traffic along Broad Branch, but makes no analysis of the consequences of that traffic. Instead it concludes, without support, that there will be no adverse impact on the Forest Hills neighborhood (or any other neighborhood) or Rock Creek Park. But there will be adverse impacts far beyond increased traffic flow along residential streets.

Several years ago the city proposed rebuilding Broad Branch Road in its entirety by raising the street level 7', placing Jersey barriers along the side, raising the speed limit, and removing approximately 120 mature trees. The City's proposal was shelved after opposition from FHCA, local citizens and ANC3F. We can almost be certain that this project, which would negatively impact a 2 mile stretch of road immediately next to Rock Creek Park (the Park starts at the east edge of Broad Branch Road), will be revived to relieve newly caused congestion. Yet the GMP makes no mention of this problem in its evaluation. The failure to consider the impact of traffic on Broad Branch Road is a fatal defect in the GMP.

Traffic cutting through Forest Hills is not an imaginary issue. Those of us who have lived in Forest Hills within one block of Rock Creek Park for 25 years can speak from personal experience about the increased traffic flows from traffic cutting through to and from Connecticut Avenue. While the GMP concludes that there would be "no disproportionate routing of traffic to disadvantaged areas or ethnic neighborhoods," it says nothing about the

actual re-routing of traffic to the surrounding neighborhoods on either side of the park, none of which are disadvantaged or ethnic. Nor could it because no contemporaneous traffic study was done. The failure to analyze this issue is again a fatal defect in the GMP.

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Moreover, the recreational gains promised in the GMP are speculative at best. Again, let me speak from 25 years of experience of walking, running, bicycling and driving along these roads literally thousands of times. And I walk along this closed stretch of Beach Drive every Sunday, so my experience is very current. It echoes the experience of the many Forest Hills residents to whom I have spoken about this issue.

Proponents of Alternative D speak glowingly of increased use by young parents, tourists, etc. When thinking of babies in carriages, proponents of Alternative D have not fully considered two things. The first issue is the safety of persons on a remote stretch of road with few users (by definition) and poor cell phone service. While weekend users can be assured of seeing many other individuals, the GMP itself says encountering others would be an isolated event. Will parents be pushing baby carriages alone on dark November afternoons?

But the second issue is a more general safety concern. How will the Park Police deal with a wheelchair in the middle of the closed stretch at 3:15 p.m.? Will Beach Drive be left closed until the person clears? What will the rules be if you want to enter for a walk at 3:00 at Broad Branch and return to your car? When you reach Military Road at 3:30 will Beach Drive be kept closed until your return? Will Park Rangers be posted to ask "how long will you be here?"

The GMP is wrong in assuming that closing the gorge area to automobile traffic during non-rush hours will encourage commuting by bicycle. Because the closings are occurring during non-rush hours, they cannot – by definition -- encourage commuting to work by bicycle. Second, bicycling in this area is not a sport free of danger from those who are walking along or otherwise using Beach Drive. Facing a pack of 100 or more riders racing at a high speed (in excess of the posted speed limit) around a blind hairpin turn while you are having a pleasant walk is a far more dangerous and

frightening experience than seeing a single car moving at the speed limit. And we all must wonder whether there will be significant increases in recreational uses at 2 p.m. on cold January afternoons.

The GMP is also flawed in assuming that the morning rush hour ends at 9:30 a.m. Again those of us who live in Forest Hills base this on our first-hand observation and experience over many years.

At its heart, Rock Creek is an urban park to be used by the residents of the City. One of the first uses it was given was for recreational motoring. Although we have

no problem with the current road closing schedule, we can see no good reason why driving through the gorge at 12 noon should be prohibited 365 days a year. The GMP has not considered the impact of the planned closings on the surrounding neighborhoods, including the potentially disastrous consequences on the Park and on the environment of rebuilding Broad Branch Road because of the increased traffic that will be forced onto it. We urge that you adopt Alternative B.

Friends of Open Parkways, friends@openparkways.org

Subject: Friends of Open Parkways Oppose any Further Closures

July 15, 2003

Dear Mr. Carlstrom and Ms. Coleman:

Attached is a letter stating our position on the Park Service's DRAFT Management Plan. Should you have trouble opening the attachment, please let us know.

Sincerely,

Leaders, Friends of Open Parkways  
[www.openparkways.org](http://www.openparkways.org) (See attached file: CarlstromOpenparkwaysLetter.pdf)

Friends of Open Parkways

As members of Friends of Open Parkways, we are writing you today to let you know the overwhelming support there is for keeping Beach Drive open to all. Listed below are the various organizations that oppose closing Beach Drive.

**Advisory Neighborhood Commissions:**

The Advisory Neighborhood Commissions consider a wide range of policies and programs affecting their neighborhoods, including traffic, parking, recreation, street improvements, liquor licenses, zoning, economic development, police protection, sanitation and trash collection, and the District's annual budget.

In each of these areas, the intent of the ANC legislation is to ensure input from an advisory board that is made up of the residents of the neighborhoods that are directly affected by government action. The ANCs are the body of government with the closest official ties to the people in a neighborhood.

The ANCs present their positions and recommendations on issues to various District government agencies, the Executive Branch, and the Council. They also present testimony to independent agencies, boards and commissions, usually under rules of procedure specific to those entities. **By law, the ANCs may also present their positions to Federal agencies.** The following Advisory Neighborhood Commissions (ANC) passed resolutions to support Alternative B.

The Advisory Neighborhood Commission Assembly (representing all 37 ANCs)  
ANC 1D (representing approximately 12,000 DC residents)  
ANC 3C (representing approximately 18,000 DC residents)  
ANC 3F (representing approximately 14,000 DC residents)

ANC 3/4 G (representing approximately 14,000 DC residents)  
ANC 4A (representing approximately 16,000 DC residents)  
ANC 4C (representing approximately 20,000 DC residents)

The map below, in orange, depicts ANC boundaries which surround Rock Creek Park and who oppose any more closures.

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**Neighborhood Civic and Community Organizations:**

The following neighborhood organizations also support Alternative B:

**The Rollingwood Citizens Association**, Chevy Chase, MD (representing 2,300 residents bounded by Beach Drive, East-West Highway, Brookeville Road and Western Avenue.)

**Rock Creek Forest Homeowners Association**, Chevy Chase, MD (representing 400 residents, bordered by Beach Drive to the West, EW Highway to the North and Grubb Road to the East.

**Donneybrook Homeowners Association**, Chevy Chase, MD (representing 400 residents) bordered by Beach Drive to the West, EW Highway to the south and Grubb Road to the east.

**The Mount Pleasant Neighborhood Alliance**, DC (representing 500 residents bounded by Beach Drive, Piney Branch Parkway, 16th Street, Adams Mill Road and Klingle Road.)

**The Crestwood Neighborhood League**, DC (representing 105 residents bounded by Rock Creek Park to the West and 16th

Street to the east; south to Piney Branch Parkway and north to Kennedy Street.

**The Shepherd Park Citizens Association**, DC (representing over 200 residents in Ward 4)

**The Gateway Coalition**, DC (representing many local associations in Ward 4)

**The Federation of Citizens Associations of the District of Columbia** support Alternative B. **The Federation has a membership of 40 civic associations** representing thousands of residents throughout the District of Columbia. They are:

1. American University Park Citizens Associations
2. Association of Oldest Inhabitants of the District of Columbia
3. Burlingame Citizens Association
4. Capitol Hill Restoration Society
5. Cardoza-Shaw Restoration Society
6. Chevy Chase Citizens Association
7. Citizens Association of Georgetown

8. Cleveland Park Citizens Association
9. Cloister in Georgetown Homeowners Association
10. Columbia Heights Citizens Association
11. Columbia Plaza Tenants Association
12. Concerned Neighbors Civic Association
13. Crestwood Neighborhood League
14. Dupont Circle Citizens Association
15. Foggy Bottom Association
16. Forest Hills Citizens Association
17. Fort Gains Citizens Association
18. Fort Lincoln Citizens Association
19. Foxhall Citizens Association
20. Georgetown Residents Alliance
21. Glover Park Citizens Association
22. Hillandale Homeowners Association
23. Hillcrest Community Civic Association
24. Kalorama Citizens Association
25. Manor Park Citizens Association
26. Marshall Heights Civic Association
27. Michigan Park citizens Association
28. Mt. Vernon Square Civic Association
29. Neighbors for a Livable Community
30. North Michigan Park Civic Association
31. Palisades Citizens Association
32. Penn Branch Citizens Association
33. Residential Action Alliance
34. Shepherd Park Citizens Association
35. Sixteenth Street Heights Citizens Association
36. Southwest Neighborhood Alliance
37. Spring Valley Court Citizens Association
38. Spring Valley-Wesley Heights Citizens Association
39. West End Citizens Association
40. Woodley Park Citizens Association

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Page 6 of 7**District of Columbia and Maryland Council:**

The Council of the District of Columbia is the legislative branch of the District government. All legislative powers are vested in the Council. In addition, the council approves the District's annual budget and financial plan, and sets the revenue required to fund the budget. It oversees the programs and operations of government agencies, and acts on or initiates reorganization plans for the Executive Branch. The Council determines land use, through the adoption of the comprehensive plan, and undertakes redistricting based on the decennial census. The Council develops legislative initiatives and budget priorities to promote the public welfare. It oversees the performance of government agencies and the implementation of management reforms to improve service delivery. As the local elected representative body, the Council seeks citizen participation throughout the legislative process. It holds

public hearings to provide an opportunity for public comment on proposed legislation, policy initiatives and government operations. Also, the Council helps citizens access government information and services.

The DC Council, voted overwhelmingly 11-2, on a resolution that may be cited as the "Sense of the Council on the National Park Service's Draft General Management Plan for Rock Creek Park Emergency Resolution of 2003".

**The Montgomery County Council** supports the current traffic management plan on Beach Drive in Rock Creek Park and requests that the National Park Service not change it. The Council supports and agrees with the Resolution from the Council of the District of Columbia and the letter from Congressman Van Hollen.

**Other Political Supporters:**

**Congresswoman Eleanor Holmes Norton**  
**Congressman Van Hollen**  
**County Executive Douglas Duncan**  
**Mayor and Council of Kensington, MD**

**Conclusion:**

Any new vehicular restrictions on Rock Creek Park's roadways would divert substantial traffic to other existing major north-south routes in the city, such as 16th Street, 14th Street, Connecticut Avenue, Massachusetts Avenue, and Wisconsin Avenue. Such restrictions would add even more congestion to already severely

overburden major thoroughfares and our adjacent residential streets. The District and its citizens already suffer from the adverse

transportation, economic, and environmental impacts of other federally-imposed vehicular traffic restrictions. We don't need to add another.

If there is an identified need for more paved biking trails, then the answer is not to exclude the majority of current users from our historic parkways. Instead, we need to look at enhancing existing trails or making new ones. The Park Service's own recommendations suggest that separate bikeways are the safest alternative. We may be able to enhance some of the underutilized trails; or create new paved trails away from the roadway.

We strongly oppose NPS's preferred plan which would exclude automobiles from recreational day time use of Beach Drive. We also strongly oppose any proposed "testing" of any closure alternative. Beach Drive and the other parkways in Rock Creek Park were created to provide broad public access to its beauty and should not be converted to commuters-only roads, or worse, closed to traffic altogether. Further restricting Beach Drive is another step toward completely eliminating the traditional and historic experience of touring Rock Creek Park, and also would rob the public of cultural resources that so many DC residents and visitors have enjoyed and cherished for nearly 100 years.

Rock Creek Park is a national park dedicated by Congress in 1890 for all people and was designed by Frederick Law Olmsted Jr. with scenic parkways for driving, and other amenities for picnicking, hiking and horseback riding throughout its vast distances. As such, the park was designed as an inclusive facility accessible to all. The bicycle path was created in the late '70s, and is enjoyed by many walkers, strollers, bicyclists and skaters. While it may make sense to accommodate these additional recreation uses, it is not fair to do so at the expense of the vast majority of users and contrary to the original intent and dedication of the park.

Instead of closing down our public roadways, maybe you should consider reserving the bridle paths for bicycle use from 9:30 am to 3:30 pm.

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Further, the NPS preferred alternative does not have the support of the community at large. On the contrary a community groundswell opposes blocking Beach Drive. This broadly-based grassroots uprising against the National Park Service plan is based in many sound principles including sensible transportation policy, fairness, enhanced public safety, and respect for culture and history.

The NPS plan to close Beach Drive does a disservice to the public in favor of special interest politics. It is one thing to oppose new roadway construction through established neighborhoods and green space. It is quite another for fringe special interest groups to take away our public roads for the benefit of a few. These efforts cross the line from appropriate influence of public policy to self-serving pilferage of public property. As we have seen with Klingle Road, if control of Beach Drive is given over to marginal special interests, it may be lost forever.

To paraphrase Chris Brown, Chief, National Park Service, River, Trails, and Conservation Assistance Program, 'Parkways are many things to many people. And that's one of their virtues.

Sincerely, Laurie Collins, Ann Ford, Anthony R. Scialli, Tom Broadwater, Robert Blaunstein, Nina Scherago, George Jones, Phyllis Blaunstein, James H. Jonz, Area Leaders, Friends of Open Parkways

Subject: Peirce Mill in the GMP

On behalf of the Friends of Peirce Mill, I wish to comment on the General Management Plan as it relates to the current restoration project at the mill. The various alternative plans presented in the GMP are virtually identical in their references to Peirce Mill. However, the report fails to mention that the objective of the project is to restore the mill to operation. For example, on page 99 it says: "The mill would be managed consistent with the recommendations of a historic structure report, currently nearing completion. The mill would provide demonstrations of the historic milling industry in the valley." And again in Table 6 on page 108 the reference to the mill states "Rehabilitate the mill to focus on history of milling and land use in the Rock Creek area".

While it is true that the HSR presents a plan which would indeed restore the mill to operation, we would like to see a specific statement that the ultimate objective is an operating mill. Such a statement would reassure our members and our donors that the Park is committed to an operating rather than a static demonstration of milling -- a "living museum of milling".

Respectfully submitted,  
Richard D. Abbott  
President, Friends of Peirce Mill

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**Hearing on Rock Creek Park General Management Plan's  
Alternative D  
National Park Service  
May 22, 2003**

**Presented by:  
Chris Weiss, Director, D.C. Environmental Network  
Friends of the Earth**

Thank you Superintendent Coleman and all National Park Service employees and others who participated in putting together the "Draft" General Management Plan and for making sure the public has a chance to let you know how we feel about it.

My name is Chris Weiss. I serve as Director of the D.C. Environmental Network at Friends of the Earth. Friends of the Earth is a national environmental organization with over 1800 members in the Metropolitan Washington region. The D.C. Environmental Network, spearheaded by Friends of the Earth, consists of over 150 environmental, health and civic associations who believe the economic and environmental well being of District residents is tied to successful stewardship of our fragile urban environment...including our much prized national parks. Friends of the Earth is also a proud and active member of the People's Alliance for Rock Creek (PARC).

Friends of the Earth strongly supports PARC's position in favor of Alternative D, the mid-weekday recreation enhancement option. We believe Alternative D meets the needs of the greatest number of residents in the Washington metropolitan region. Of all the alternatives, this compromise, most fairly protects the interests of the surrounding neighborhoods, including the many pedestrians, seniors, bicyclists and motorists who presently use Rock Creek Park.

The beauty of this proposal is that on top of protecting existing uses, it enhances and opens up this sometimes under appreciated resource to potentially thousands of new users including tourists, school groups, families with small children and others.

It is also important to note that Wise Road, Bingham Drive, Military Road, Morrow Drive, Oregon Avenue, Glover Road, Ross Drive, Broadbranch Road, Blagden Avenue, Park Road, Porter Street and Rock Creek and Potomac Parkway would be open to motor vehicles at all times during this limited, six hour, non rush-hour, Beach Drive closure.

Subject: Help Rock Creek Park

National Park Superintendent Adrienne Coleman  
Rock Creek Park  
3545 Williamsburg Lane NW  
Washington, DC 20008

Dear National Park Superintendent Adrienne Coleman Adrienne Coleman,

I am writing to SUPPORT the National Park Service's preferred option to establish weekday recreation zones on Beach Drive in Rock Creek Park. Rock Creek Park is one of the great treasures of the Washington area, but as currently managed, the heart of the Park is available only to motorists five days a week. I commend the Park Service for seeking a balanced approach that will allow pedestrians, cyclists, roller bladers, and people of all ages and physical abilities to experience the Park seven days a week.

Sincerely,

Chris Weiss  
Friends of the Earth  
3203 38th Street NW  
Washington, District of Columbia 20016

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MR. WEISS. It's Chris Weiss. The Weiss is W-E-I-S-S, and I live in D.C.

And I'm here actually representing Friends of the Earth.

Thank you Superintendent Coleman and all National Park Service employees and others who participated in putting together the draft general management plan, and for making sure the public has a chance to let you know how we feel about it. My name is Chris Weiss, I serve as Director of the D.C. Environmental Network at Friends of the Earth.

Friends of the Earth is a national environmental organization with over 1800 members in the Metropolitan Washington region. The D.C. Environmental Network spearheaded by Friends of the Earth consists of over 150 environmental health and civic organizations who believe the economic and environmental well being of District residents is tied to successful stewardship of our fragile urban environment, including our much prized national parks.

Friends of the Earth is also a proud and active member of the People Alliance for Rock Creek. Friends of the Earth strongly supports Park Service's position in favor of alternative D, the mid weekday recreation enhancement option. We believe alternative D meets the needs of the greatest number of residents in the Washington Metropolitan region. Of all the alternatives, this compromise most fairly protects the interests of the surrounding neighborhoods including the many pedestrian, seniors, bicyclists and motorists who presently use Rock Creek Park. The beauty of this proposal is that on top of protecting existing uses, it enhances and opens up this sometimes unappreciated resource to potentially thousands of new users, including tourists, school groups, families with small children and others.

It is also important to note that Wise Road, Badgen Drive, Military Road, Marrow Drive, Oregon Avenue, Grover Road, Ross Drive, Broad Branch Road, Badgen Avenue, Park Road, Porter Street and Rock Creek and Potomac Parkway would be opened to motor vehicles at all times during this limited 6 hour non rush hour Beach Drive closure.

Implementing alternative D would help Rock Creek Park much like New York, San Francisco and Portland have done for years to attract more tourism by carefully balancing the interests of motorists and recreation. Only alternative D establishes this important balance.

Of course, cutting back on the use of Beach Drive even for a limited amount of time can positively impact the park's fragile environment. Reduction of pollutant in Rock Creek, reduced wildlife road kills and increases of non-motorized recreation and transit even in small quantities are beneficial.

What we should not underestimate is the opportunity alternative D gives our communities to educate a greater number of park users to the economic and environmental importance of maintaining parks, even in a challenging urban setting like the District. Giving more people access to Rock Creek Park and increasing park user's appreciation of this special resource means we just might have a fighting chance to finally clean up our polluted rivers and creeks, clean up the dirty air we breath and protect the environmental health and quality of life for all the region's millions of residents.

Your implementation of alternative D could well contribute to tackling these pressing environmental challenges. Thank you.

**NEAL R. GROSS**

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1323 RHODE ISLAND AVE. N.W.

WASHINGTON, D.C. 20005-3701

### *The Gateway Coalition*

*Of Business and Civic Associations in Maryland and D.C.  
Dedicated to the Revitalization of South Silver Spring  
And Upper Georgia Avenue in the District of Columbia*

**Co-Chair for Maryland**  
Daniel Meijer  
929 Gist Avenue  
Silver Spring Md. 20910  
(301) 585-1458

fax #: (301) 585-9110

**Co-Chair for District of Columbia**  
Gracie Baten  
7624 13<sup>th</sup> St. N.W.  
Washington D.C. 20012  
(202) 882-6162

June 1, 2003

Superintendent, Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008

RE: Rock Creek Park General Management Plan

Dear Sir or Madam:

The Gateway Coalition would like to go on record as supporting "Alternate B".

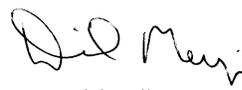
The Gateway Coalition consists of both business and civic associations in D.C. and Maryland, dedicated to the revitalization of upper Georgia Avenue in the District of Columbia as well as South Silver Spring.

At our last general meeting, many of our members in attendance expressed considerable concern regarding the proposed closure of Beach Drive and its impacts to the surrounding community. Our DC members in particular, felt that Beach Drive should be open to all and not discriminate against those who lack the physically ability to access the Park by non-motorized means. Others felt the proposed closure would exacerbate local neighborhood traffic congestion as well as restrict access to facilities (such as medical facilities) across or via the Park.

Thank you for considering the concerns of our members in selecting "Alternate B".

Sincerely,

  
Gracie Baten  
DC Co-Chair  
Gateway Coalition

  
Daniel Meijer  
MD Co-Chair  
Gateway Coalition

**National Park Service, Rock Creek Park  
Public Meeting on the  
Draft General Management Plan Environmental Impact Statement  
Auditorium, University of the District of Columbia  
May 22, 2003, 5:30 – 9:30 p.m.**

**Statement of Jonathan L. Gifford  
Associate Professor and Director  
Master's of Transportation Policy, Operations & Logistics  
School of Public Policy, George Mason University  
3401 N. Fairfax Drive, MS 3B1  
Arlington, Virginia 22201**

My name is Jonathan Gifford. I direct the Master's in Transportation Policy, Operations and Logistics at George Mason University in Arlington, Virginia. I have a Ph.D. in transportation engineering from the University of California, and more than 20 years of research and teaching experience in transportation policy and planning.

I am an avid bicyclist, an avid motorist, and a frequent user of Rock Creek Park and Parkway, as well as the other wonderful parks and parkways in our region. As a taxpayer and one of the 12 million annual commuters who use the Park, I believe that my use and appreciation of its beauty and scenery are every bit as valid and significant as those who choose to choose to visit the park by foot or bicycle. I believe it is the responsibility of the Park Service to manage the Park in such a way as to accommodate the use of all, and not to subordinate the interests of a vast majority to those of a small minority of users.

Furthermore, I emphatically believe that parkway commuting has an uplifting impact on the parkway user, and provides a welcome scenic alternative to many of the other highways in our region.

I have carefully reviewed the Draft Plan and have three concerns.

First, the Park Service should revisit its determination that a continuous trail separate from Beach Drive cannot feasibly be constructed and that "the only way to provide a continuous recreational trail through the [upper] valley would be to permanently close sections of Beach Drive to automobiles" (p. 29). The Park Service itself in 1980 recommended the construction of this trail, but now concludes that while it is possible, it would be "extremely difficult and expensive to mitigate" the impacts (p. 29).

EX-101  
MAY 22 2003

I believe that with careful construction and judicious management, such a trail could be instituted, which would then allow removal of bicycle traffic from Beach Drive while affording safe and convenient bicycle commuting and recreational use through the upper valley. In particular, I would recommend that the Park Service develop an engineering design of such a trail in order to assess its cost and impacts. Such a design should make every feasible effort to mitigate adverse impacts on endangered species habitat, wetlands and National Register properties.

Second, I believe the recommended Alternative D, Mid-Weekday Recreation Enhancement, fails to address the most pressing traffic and bicycle safety hazards in the Park, and benefits a very small number of recreational bicyclists. Mid-weekday closures of Beach Drive will do nothing to provide safe bicycle commuting in the upper valley of the Park during rush hour. As motorized and bicycle rush hour traffic continue to increase, the likelihood of crashes, injuries and fatalities is very likely to increase as well.

Mid-weekday bicycle usage of Beach Drive under Alternative D is expected to be very low, 20-35 users per hour (p. 34). I estimate that the number of displaced motorists during these hours of closure to be approximately 2,400, a ratio of more than 10 displaced auto users for each bicyclist.<sup>1</sup>

I concur with ruling out Alternative C, Nonmotorized Recreational Emphasis, due to its impacts on the regional transportation system. That being the case, I recommend that the Park Service reopen the issue of a continuous trail in the upper valley separate from Beach Drive as the best way to accommodate the full range of Park users safely and efficiently. If cost is an issue, the Park Service should consult with the Federal Highway Administration on possible funding of such an expansion.

Finally, the Park Service appears not to have updated its traffic survey for 13 years, since 1990. Given the significance of the potential impacts on motorized park users of some alternatives, it seems highly inadequate to base a management plan on such outdated information.

Thank you.

<sup>1</sup> 1990 usage of Beach Drive between Park Road and Porter Street was 8,900/day, with 800 during the morning peak hour and 900 during the evening peak hour. Assuming morning and evening peaks of 2.5 hours, and zero traffic from 11 p.m. to 6 a.m. yields approximately 400 vehicles/hour during off peak periods.



GREATER WASHINGTON  
Board of Trade

Growing Business. Building Community.

May 19, 2003

Ms. Adrienne Coleman  
Superintendent  
Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, DC 20008

Dear Superintendent Coleman:

On behalf of the Greater Washington Board of Trade, I respectfully request that the status quo be maintained on use of the roads in Rock Creek Park. The park roadway system is of vital importance to commuters, non-commuters and park visitors. It should be maintained as is.

Closing any section of the park to auto use will cause for spillover and additional cut-through traffic to adjacent neighborhood roads and will result in increased traffic congestion to the District of Columbia and adjacent feeder streets from Maryland. This increase in traffic congestion would waste fuel, produce more air pollution, and increase the time already wasted on commuting trips due to congestion. For the non-commuting public and tourists, access would be reduced and the park experience would be unavailable.

The Board of Trade is the largest regional network of business and non-profit leaders and the only group representing all industry sectors. The Board of Trade's 1,350 member companies employ 40 percent of Greater Washington's private-sector workforce. Organizations join the Board of Trade to grow their business and help build a better community.

Thank you for the opportunity to comment on this important decision that will impact our city and region.

Sincerely,  
  
ROBERT A. PECK  
President

1725 I Street, NW, Suite 200 Washington, DC 20006 T 202.857.5900 F 202.223.2648 www.bot.org

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MR. CUSHMAN: I don't think Bob is going to speak because I—I'm going to say what we want to say.  
I am Lieutenant General John Cushman, United States Army retired. And I've been asked to represent the 280 people who live at Knollwood Army Retirement Residence.  
Now, the average age of these residents is 85. Some 22 of them are here tonight, and after I speak I think we're all going to get on our bus and go back to our residence. But we want to get across one point. Most of these residents have their hospital and their clinical medical care provided by Walter Reed Army Medical Center. Between 16<sup>th</sup> and Georgia Avenue, just across the park. A bus takes these residents to Walter Reed Hospital and back 6 or times every weekday.  
Our interest is in Badgen Drive, Cheryl Drive and the connecting Beach Drive line. To close this section on weekdays would require all of these trips to use Oregon Avenue, Military Road and 16th Street—  
SUPERINTENDENT COLEMAN: Those roads won't be closed, sir.  
MR. CUSHMAN: Say again.  
SUPERINTENDENT COLEMAN: Those roads would not be closed under any of the alternatives.  
MR. CUSHMAN: I just found that out. We just want to be sure that you're not going to close—you're going to keep them open.  
I'll just say one more thing. Emergency ambulances use that same route. And six or eight times a week ambulances go that route during daylight hours. That's my message.  
This helps shorten your program, I think.  
Thank you much.

MR. ARONICA: My name is Lou Aronica. I live in D.C.. I am the Conservation Chair for the Maryland Native Plant Society. I speak on behalf of the society and the members who live in the District of Columbia.  
It seems to me that the three greatest threats to the forest community, to the naturally functioning system are excess water that courses through the park, the invasives that are overwhelming the park and over use of automobiles in the park. Of the three, the only one that is readily and simply addressable is the last, although it is the most politically contentious.  
On the question if invasives, I commend the staff and the Park Service for attempting to control the invasives and to lay out a plan. It's a very, very long term problem. And I would like in the management plan a commitment to persist on this. There are going to be some of the species that are very difficult to eradicate. We pledge that as the Plant Society pledges itself to be of any assistance that we can on this.  
And finally, on this question of traffic, it seems to me that over the years we have allowed this idea that the park becomes a commuter arterial. Up until the time that this new tunnel with all the ford crossings, it was more muted. We have to at some point say that the park is managed for the naturally functioning systems and that all other uses, including bicycles, cars, people usage has to be in accordance with the health and the vitality and the continuation of those natural systems.  
I have a great deal of sympathy for the people who say I don't want extra traffic in my neighborhood. But to simply say we're going to tolerate an increase in traffic through the park when we know it is damaging, we have got to get out of that. Maryland Native Plant Society prefers the 7 day closure similar to what's on the weekend now with one exception, and that is from time-to-time it would be worthwhile to have a car holiday, that is one in which cars are allowed into the park, perhaps in the spring for a couple of days, perhaps during the fall, color season under a reduced speed limit and outside of the commuting hours.  
If we need to talk about a compromise, I must say I'm very mystified by the compromise that we're talking about. That is, allowing the rush hour traffic and then closure during the day. I would prefer the opposite. And if it is to reduce the impact of the cars in the park, it would seem to me that the reasonable thing would be to keep the park auto free from 3:30 in the afternoon until 9:30 in the morning, allow people and cars under this regulated speed limit to coexist during the middle of the day.

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I'm concerned because I think we're probably not going to get what we're asking for. I don't want those of us who are basically part of this environmental community to continue supporting a compromise that really doesn't get us anywhere. I'll extend these comment and pass them in.

Oh, I'm sorry, one more thing. I do agree with a couple of the speakers who said that on balance the management plan doesn't quite cover enough things. And that's probably because you've been stuck with this question of how to deal with the traffic. I really think we need to get together and talk about all the other stuff and I don't know how we're going to deal with it.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

Subject: Rock Creek Management Plan

Adrienne Coleman  
Superintendent, Rock Creek Park

Unfortunately, the Rock Creek Park Management Plan process has become merely a discussion a the road through Rock Creek Park. In keeping with this single focus, however, I have a suggestion that I think will solve some of the traffic problems in Rock Creek Park as well as save money that can be better used to preserve the beauty and function of Rock Creek Valley. I suggest that all one-way restrictions be removed from Rock Creek and Potomac Parkway. This practice makes it just too convenient to drive downtown rather than use public transportation. This return to two way traffic at all hours of the day and night would surely cut down on the volume of traffic in the morning and afternoon rush hours. The money used to monitor this car encouraging system (surely in the millions) could be reprogrammed to (1) improve the quality of water in the Creek (effective storm water management), (2) improve the natural function of the Valley (effective exotic invasive control), and (3) educate the public, especially school children, about the natural environment in their midst (effective outdoor education).

I think this is the time to re-examine this "crazy and eccentric" practice of one-way roads at different times of the day and give the Parkway back to the people who really enjoy the Parkway as a way of seeing the Park, not just as a fast and efficient commute.

Mary Pat Rowan  
Landscape Architect  
Founding and current Board Member, Maryland Native Plant Society (Washington, DC Chapter)

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MS. MacKIERNAN: Yes. Superintendent Coleman, my name is Gail MacKiernan. That's M-A-C-K-I-E-R-N-A-N. I'm representing the Maryland Ornithological Society. I'm on the state conservative committee and also conservation chair of the Montgomery County chapter.

I've read the management plan strictly from the point of looking at the natural resources, which National Park Service is mandated to protect. I find the draft management plan inadequate because it does not recognize, much less discuss it in any length, the importance of Rock Creek Park to migratory birds. The reference to migrants appears only in a very brief summary of birds in the park. It is extremely surprising, in fact rather dismaying since during the 1999 cell phone controversies, literally inches of testimony were delivered to the National Park Service on the importance of Rock Creek as a migratory corridor through the increasing urbanized D.C. area.

To reiterate, over 180 species of birds, including all the northeast wobblers, flycatchers and thrushers have been recorded in Rock Creek Park in the past decade, as well as numerous species such as Hummingbirds, swallows, jays and other migrants. Some species are found in extremely high numbers which rival internationally migratory hotspots such as Cape May and Point Pula in Ontario. Rock Creek is locally the top migrant hotspot in the D.C. area.

This twice yearly movement of hundreds of thousands of birds through Rock Creek Park is a wonderful natural phenomenon and one of our city's nation treasures. It is recognized nationally and noted in several books, including the new *American Birding Association Guide to Birding in American Cities*. On any given day at the peak of migration there are scores of birders in the park and they represent a major park user group which is hardly mentioned in the management plan. I have three points to make.

Because of the importance of the park to migrate birds is not recognized, there is obviously nothing in the plan about managing for these species or their habitats. The plan lacks any discussion of habitat preferences for migrants, their needs for food or shelter and how habitat within the park could be enhanced for them.

Secondly, the Rock Creek draft management plan needs to recognize the importance of migratory birds both as natural values of the park and their value to a large and growing segment of park visitors. The U.S. Fish and Wildlife Services recognized birdwatching as the most rapidly growing outdoor activity in the nation and is growing more rapidly than, for example, bicycling. No offense to the bicyclists.

Materials should be provided to enhance the display of migration of birds. A park bird list is being prepared by the citings board of the nature center which could note all interesting citings in a display on bird migration at the center should be considered.

Third, and this is very important, the National Park Service should ensure that appropriate in-house or outside experts when necessary review and clear all management actions within the park which could impact living resources including birds. Right now I feel that there is sometimes a discount between the input from the national resources staff and the management of the park. Mrs. Rachlin in an earlier testimony talked about cutting down of dead trees. I actually examined some of those dead snags that were cut down. They contained active woodpecker borings and could very well have contained nests which went through the chipper. It would also help if you removed the—from the park, which was promised about 5 years ago.

And finally in conclusion, I would like to recommend that the Park Service use its own staff, which has considerable expertise, as well as employee experts from nearby agencies such as the Migratory Bird Specialists at the Patuxent National Wildlife Research Center to develop a comprehensive management plan for migratory and resident birds and their habitats in Rock Creek. And furthermore, to seek outside partners through the birding community to do such activities as remove invasive species and promote bird walks and so forth within the park.

Looking at the alternatives, we're not so concerned with the transportation alternatives per se, but we're very concerned about the potential for building the new administrative and U.S. Park Police headquarters at the maintenance yard, which as Ms. Rachlin said, is an important habitat for birds.

And since field habitat only represents 1.5 percent of the park habitat, I think it would be a good idea to enhance it and not destroy it.

**NEAL R. GROSS**  
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3001 Veazey Terrace  
Apartment 1634  
Washington, DC 20008  
May 2, 2003

**MACKIERNAN COMMENTS ON DRAFT MANAGEMENT PLAN**

July 12, 2003

Superintendent  
United States National Park Service  
Rock Creek Park  
3545 Williamsburg Lane, NW  
Washington, DC 20008-1207

To: National Park Service, Rock Creek Park  
Superintendent  
3545 Williamsburg Lane, N.W.  
Washington D.C. 20008-1207

Re: Comment on the Draft General Management Plan/ Environmental Impact Statement,  
Rock Creek Park and Potomac Parkway.

Re: draft General Management Plan/EIS Rock Creek Park

I would like to take this opportunity to comment on the Draft General Management Plan for Rock Creek Park. Most of this document (and most of the public input) has focussed on the traffic management options. However, as a professional biologist and a person well-acquainted with the park, I was interested to see what plans had been put forth for natural resource management. In particular, the completeness of information regarding migratory birds, as I have been participating in migration surveys in RCP for over 10 years.

Dear Sir or Madam:

Naturally, it was with considerable dismay that I found very little in the draft plan relating to migratory birds in general, and almost nothing specifically relating to bird migration in Rock creek Park itself. This is even though a tremendous amount of data had been submitted to the National Park Service during the 1999 hearings on cell phone tower construction in the park. (Particularly surprising considering the recent successful law suit against NPS, where lack of attention to potential impacts on migratory birds formed the basis of the court requiring a new EIS on the phone towers.) The inescapable conclusion is that the group preparing this draft plan were not given this information, or did not seek it out, and in fact, appear virtually unaware of the importance of the park as a migration corridor through urban Washington DC.

I am writing to comment on the draft General Management Plan/Environmental Impact Statement for Rock Creek Park and the Rock Creek and Potomac Parkway on behalf of the Melvin Hazen Community Garden Association. We are pleased to see that the plan recognized that Rock Creek Park is an "oasis for urban dwellers, offering respite from the bustle of the city". We agree that this is a significant feature of the Park.

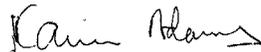
**Bird Migration in RCP, a Summary:**

We do not see any changes in policies regarding this type of developed facility in any of the four alternatives. We believe that Melvin Hazen Community Garden is a model community garden in the Washington DC area, with a diverse group of dedicated gardeners of all ages.

As the Washington region has urbanized, and as the city's forest cover has declined in recent decades, Rock Creek Park has become probably the major corridor in spring and fall for hundreds of thousands of migratory birds. Many of these are neotropical species (thrushes, warblers and so forth) which are showing significant population declines and all of which are protected under the federal Migratory Bird Treaty Act. Surveys conducted during the migration period in both spring and autumn for the past 10 years have recorded impressive numbers of migrants, and in fact, the park is widely recognized as the best place in the Washington area to observe bird migration (1,2). In a recent article, the National Audubon Society named Rock Creek Park as one of the top destinations in the USA to observe bird migration. As an example, a summary of results from the spring 2003 survey are being submitted by Mr. Barry Cooper as part of his comments on the management plan (3).

We applaud the United States Park Service for their continued support of community gardens in Rock Creek Park.

Sincerely,



Karin Adams  
President  
Melvin Hazen Community  
Garden Association

The importance of this phenomenon should not be underestimated. It is one of Rock Creek's unique natural features, not shared by any other NPS property in this region. This is, in part, a result of the unique orientation and topography of the park, which runs almost due north and south and thus forms a perfect migration "pathway." Most neotropical species migrate at night, orienting by the stars. They also preferentially follow ridges, and the forested ridges to the east and west of the stream are another positive feature of the park (4). Comparisons of bird numbers and diversity (on the same

day) at Rock Creek and flood-plain parks such as the C&O Canal dramatically reinforce this observation.

Naturally, such a unique phenomenon has not passed unnoticed by the public. On any given day during the peak of migration, dozens of birdwatchers may be seen on the west ridge of the park, where observation is easiest due to access roads and open glades from which the trees can be more easily scanned. Many of these visitors go to picnic areas 17/18, others to the vicinity of the Nature Center, while others survey the Maintenance Yard. During migration season, birders represent one of the major user groups for the park and yet they are barely mentioned in the draft management plan.

I identify three major problems with the Draft Management Plan:

**1) The biological data presented on birds is inadequate, despite the considerable amount of information provided in recent years to NPS and to the RCP management on both migratory and resident birds by scientists and naturalists.**

For example, the plan notes that "approximately 22-24 species of birds nest in the breeding bird census area in RCP." No data are submitted for the park as a whole. That number is much closer to 60 species, and the ongoing 5-year Maryland/DC Breeding Bird Atlas project (supported by Maryland Department of Natural Resources) is already adding to this total. Some breeders are common birds, such as Northern Cardinal, which nests widely throughout the park while others breed irregularly or in very localized areas (Yellow-throated Vireo, Barred Owl). The Audubon Naturalist Society has conducted its breeding bird survey in the vicinity of the Maintenance Yard since the 1940s, and although this survey is described, no data from it are presented. It would have been useful to know what changes have been recorded since the survey was initiated, and to have hypothesized as to causes. Finally, although several tables of bird (and other) species of concern to Maryland and Virginia are included in the Plan appendices, these are not put into any context – not even which (if any) of these bird species occur in RCP and when.

**Recommendation:** The NPS should completely rewrite the section relating to birds, both migratory and resident, and utilize information readily available to it (or already in its possession). Emphasis should be on migratory and breeding species. As an aside, many of the RCP naturalists have considerable expertise and could undoubtedly perform this function if given time and resources, or it could be done by an employee of Patuxent Wildlife Research Center which has a large migratory bird office.

**2) Because there is no detailed overview of birds, migrant or otherwise, there is no discussion of how park habitat problems affects migrant or breeding birds (invasive plants, deer over-grazing, etc.). Nor is there any comprehensive plan on enhancing park habitat for birds and addressing factors affecting their survival, problems which in some cases are exacerbated by inappropriate management activities.**

One of the major problems obvious to all RCP visitors is that of invasive plants, which affect park wildlife by crowding out native plant species and which may actually constitute a direct threat. Attached to this comment sheet is a page from the National Park Service's own publication relating the death of hummingbirds in RCP due to the exotic weed Burdock. I was one of the birders who found the trapped and dying hummingbirds, and since that time, we have released several other species from the velcro-like seedheads of the plant. Although the hummingbird pictured is now enshrined under a bell jar in the RCP naturalists' offices, and is taken around to demonstrate the

dangers of exotic plants, in the park itself Burdock still flourishes. In fact, in the Maintenance Yard it now occupies a much larger area than when this article was written. While the problem of eliminating invasive plants throughout RCP is monumental and discouraging, certainly RCP maintenance staff has enough manpower to eliminate this stand of weeds (as they promised 4 years ago).

Another issue involves inappropriate maintenance activities which take place with no apparent consultation with the RCP naturalist staff. In fact, there seems to be a complete disconnect between these groups – my understanding has been that activities affecting habitat within national parks always need to be reviewed by staff biologists, but this doesn't happen in RCP. Whether this is a communications problem or lack of management oversight, I cannot say, but as an example, this past spring contractors were busy cutting down and removing dead and dying trees in many areas of the park, at the height of the breeding season for hole-nesting birds and mammals (e.g. flying squirrels)! Many of the trees cut down had active woodpecker workings and may well have had active nests. If so, this may be a violation of the Migratory Bird Treaty Act, and is certainly a violation of NPS principles. When I questioned the naturalist staff, they told me that they had never been consulted and didn't know about the tree removal until they heard the chain saws! While dead trees must be removed when they threaten heavily-used public areas, except in an emergency this sort of routine work should be done in seasons when birds are not nesting. I was pleased to see (in the draft plan) a promise to "improve snag [dead tree] management" to enhance wildlife use, but whether this can be put into place without a revamping of the current way park maintenance operates is questionable.

There also needs to be a reduction of mowed areas, as has occurred in the Maryland sections of RCP. In the Washington sector of RCP, there are many areas regularly mowed which receive little or no use by the public and would be far better left to regrow native vegetation for the benefit of birds and in fact, all the park's wildlife. Further, meadows should be managed to enhance growth of native wildflowers and other forbs, not only summer grasses, which would require mowing areas by rotation. This does not now occur, and "no-mow" areas such as that at Military Field are primarily grass which is of limited wildlife value.

**Recommendation:** Develop a comprehensive plan to enhance habitat for birds (and other wildlife) which would include, at a minimum, removal of hazardous invasive plants (Burdock) and a start at removal of other invasives in areas most used by migratory birds, replanting of native species which provide food and shelter, protection of dead tree snags and appropriate timing and review of tree cutting, and identification and establishment of more no-mow areas in RCP. Coupled with this, the park **must** put into place rational and science-based oversight for management actions. If need be a technical committee of non-involved individuals could be formed to guide this planning. Tremendous expertise exists in the region, both within the government (NPS, USFWS, USGS) as well as within academia and NGOs to form such a group. Additionally, the training of volunteers to assist with removal of invasive plants and replanting efforts will probably be necessary due to resource and manpower limitations, and should be expanded.

**3. The draft plan barely mentions birdwatchers as a user group, and thus contains no suggestions to enhance the park experience for them. The park also is missing a unique opportunity to educate park visitors about the phenomenon of bird migration, which is taking place around them every year.**

While this might not be as basic an issue as the first two, some rather low-cost actions could greatly enhance the park experience for birdwatchers and other nature lovers. Since birds are one of RCP's most unique natural resources, birds should form a more important focus of park activities and public outreach.

#### Recommendations:

- Provide information to the public on bird species in the park. A current effort in underway to redo the RCP bird checklist, which will be a great help. This list can be distributed at the Nature Center and similar places for park visitors. In addition, a Sightings Board should be placed in the Nature Center (ideally where it can be seen from outside when the center is closed) and Nature Center staff should keep this updated with interesting reports, not limited to birds (e.g. "migrating Monarch butterflies are now visiting flowers in Military Field.") Another possibility is a sightings clipboard for birders and others to enter interesting reports – these are available at many National Wildlife Refuges and National Parks. This clipboard would, however, have to be accessible at all times, not just when the Nature Center is open. Also, local bird club experts should be asked to lead bird walks or to give talks on birds to park visitors.
- Improve habitat around the Nature Center to attract birds. This is already partially underway, as a butterfly garden has been planted and a small "meadow" cleared. However, the latter is being rapidly invaded by non-native and some native forest trees, and will soon lose its open character unless it is more carefully managed. A small pond was a good addition, but needs a "bubbler" or "drip" to realize its potential to attract drinking/bathing birds. If this were provided, the location (near the paved trail and with ample benches) would be excellent for the less-active individual to sit and enjoy wildlife. The Nature Center has great potential to educate the public about bird migration, and perhaps interest a few of them in birdwatching or nature study as a hobby.
- Most birdwatchers would appreciate better attention to management of vegetation (see #2), protection of important migrant bird concentration areas (such as the Maintenance Yard) and other actions to improve habitat. They would also appreciate some common sense/courtesy – such as not mowing the major areas where birders congregate until after the peak observation times (that is, mid to late morning) during migration season. Control of off-lead dogs (which doesn't happen) and removal of free-ranging cats from the stable area would also enhance well-being of native wildlife, including birds.
- Design and build a display featuring bird migration. This might be an excellent project for which to seek outside funding or donations from a bird club or naturalist group. The display could illustrate the various species in the park, and might include charts showing the Atlantic flyway in general, the local route of birds through Washington, and a map indicating where many of the migrants breed and winter. The Nature Center already has a series of excellent small dioramas with mounted animal specimens and native plants. A similar diorama showing a tree top in RCP in mid-May, with mounts of some of the most brilliant migrants (Scarlet Tanager, Baltimore Oriole, various warblers, all of which pass through the park in large numbers in spring and fall) would be an excellent addition. It would also provide an opportunity to educate the public about hazards facing migrants and how they can help preserve this wonderful natural phenomenon. The commercial success of the movie "Winged Migration" shows that people in general find the story of bird migration endlessly fascinating.

If you have any questions about the issues raised in my comments, or would like further details, I can be reached by email at [gail@mdsg.umd.edu](mailto:gail@mdsg.umd.edu) or by telephone

Gail B. Mackiernan  
Conservation Chair,  
Montgomery Co. Chapter of the Maryland Ornithological Society

#### References:

- 1) Wilds, C. 1993. Finding Birds in the National Capital Area. Smithsonian Institution Press, Washington DC.
- 2) Lehman, P. (compiler). 2002. A Birder's Guide to Metropolitan Areas of North America. American Birding Association, Colorado Springs, CO
- 3) Cooper, Barry. 1998, 2003. Summaries of autumn and spring migration surveys in Rock Creek Park, D.C.
- 4) Dr. Chandler S. Robbins, Patuxent Wildlife Research Center, personal communication.

**From HIGHLIGHTS – Park Science, Vol. 19 (1) February 1999****National Capital****Hummingbirds succumb to vegetative 'Velcro®'**

Last September, birders at Rock Creek Park (Washington, D.C.) discovered four ruby-throated hummingbirds ensnared in the Velcro-like seed heads (photo) of common burdock (*Arctium minus*), a nonnative weed that had invaded a natural area near the park maintenance yard. Three of the hummingbirds were dead, but the group was able to free one that was still alive. Resource managers removed the 50-60 burdock plants, which can grow over 6 feet in height, and plan to control the species in the future.



(NPS photo by Rosa M. Wilson)  
One of four ruby-throated hummingbirds stuck to the Velcro®-like seed heads of burdock.

The occurrence came as a surprise to park staff and even an expert on burdock, leading to an investigation into the nature of the phenomenon. Could a loggerhead shrike have been the cause? Although the shrike is well known for impaling its prey on sharp objects such as thorns, the hummingbirds were not impaled; the recurved barbs of the seed head would have made this impossible. More importantly, the shrike is rare in this part of the country and at this time of year. A more likely scenario is that the tiny birds had been feeding at a nearby sunflower, lit on the burdock for a rest, and got entangled, sealing their fate.

An electronic note posted on the NPS Natural Resource Bulletin Board and a scientific literature search generated some answers. Other accounts of wildlife being caught and killed in burdock in

North America are on record. According to Martin McNicholl, an ornithologist in British Columbia, this plant species has been reported to occasionally kill small birds and brown bats (Science News 154(16):244); indeed, a resource manager at Wind Cave National Park (South Dakota) reported the death of a little brown bat in burdock at the park more than 10 years ago. And the problem also occurs in Eurasia, the native home of burdock. Most of the information, however, is anecdotal; a cursory literature search turned up very little scientific work that quantifies the impact of noxious weeds on birds and other wildlife.

Common burdock was first documented in this country in a flora published in 1672 and is now widespread in the United States and parts of Canada. Commonly used as a medicinal herb, the plant is also well-known to farmers and ranchers who consider it a serious agricultural weed. Burs can lodge in the skin, eyes, ears, mouth, throat, or stomachs of grazing animals, causing irritation and pain. In wild mammals such as coyotes or foxes, the burs can lodge in the fur, causing it to become matted and irritated.

The hummingbird-burdock incident at Rock Creek Park is a poignant example of yet another way exotic plant species imperil the health of natural ecosystems. This point was amplified at a September conference on exotic plants held at the Patuxent National Wildlife Visitor Center in Maryland. Hosted by the National Park Service, the conference focused on the management of exotic plants in general. A mount of one of the hummingbirds trapped in the seed head was displayed, however, and served as a graphic reminder of the importance of preserving native vegetation habitat for wildlife.

Unfortunately, burdock is not the only nonnative plant species that has invaded Rock Creek Park. Exotic vines such as porcelain berry, Asian bittersweet, and Japanese honeysuckle are choking out native vegetation and literally dragging native trees down to the ground, destroying the upper canopy where warblers and other birds nest and thrive. Add this park's problems with exotic plant species to those of every other unit in the national park system and the scale of the problem nationwide begins to become apparent. The problem is so large that funds to combat exotics, staff positions dedicated to their control, and an organized nationwide approach for dealing with them have lagged far behind their pervasive, deleterious influence.

In early February, President Clinton signed an executive order formulating a federal strategy to deal with the problems of exotic species. The order proposes an increase of nearly \$29 million for combating exotic pests and diseases and accelerating research on habitat restoration and biological integrated pest management tactics. An Invasive Species Council, chaired by Interior Secretary Babbitt, Agriculture Secretary Glickman, and Commerce Secretary Daley, will cooperate with a variety of groups to carry out the strategy.

From: "Mt. Pleasant ANC1D" <anc1d@pacyniak.com>  
July 13th 2003

"KEEP BEACH DRIVE OPEN" URGES MT. PLEASANT ANC

We oppose any and all changes in the Rock Creek Park General Management Plan that proposes to close Beach Drive to automobile traffic, including a test closure," stated Mt. Pleasant Advisory Neighborhood Commission 1D in a resolution passed on July 7th , 2003.

The resolution responds to the draft Environmental Impact Statement and General Management Plan issued by the National Park Service on March 14th , 2003. The draft plan outlines four alternatives for managing traffic in Rock Creek Park. Three of the four alternatives would impose significant traffic restrictions on Beach Drive, and one proposal would completely close three portions of the road to automotive traffic. The National Park Service is currently soliciting commentary on the proposals.

The community of Mt. Pleasant is bounded on its north and west sides by Rock Creek Park. Beach Drive is one of the only north-south arteries easily accessible to Mt. Pleasant residents.

"Beach Drive links Mt. Pleasant residents with the District's downtown on weekdays, and with recreational opportunities on weekends." explains Commissioner Barbara Bitondo, the sponsor of the resolution. "In addition, closing Beach Drive would also block our access to emergency evacuation routes."

The resolution was passed unanimously by all commissioners in attendance.

The Mount Pleasant ANC is an elected body representing the residents of Mt. Pleasant. It advises D.C. government agencies and the city council on issues involving its constituents, and is a formal part of the D.C. government. The commission holds public meetings on the first Monday of each month at 7:30 pm at 3166 Mount Pleasant Street N.W.

**Dominic Sale 1D06 Mount Pleasant ANC1D**  
Chair

**RESOLUTION**

Business District Committee

**Will Grant 1D02**

Vice Chair

Crime and City Services  
Committee



**Peter Muller 1D05**

Treasurer P.O. Box 43529 Permits and Zoning  
Washington, DC 20010 <sup>Committee</sup> (202) 494-0630,  
anc1d@yahoo.com www.anc1d.org

**Barbara Bitondo 1D01**

Secretary Latino Committee

**Jack McKay 1D03**

Commissioner Traffic and Parking Committee, Children and Schools Committee

**Jenny Babcock 1D04**

Commissioner Grants Committee Housing Committee

[d1]July 7<sup>th</sup> 2003

**RESOLUTION**

**Opposing the alternative in the draft Rock Creek Park General Management Plan that would close three sections of Beach Drive to automobiles.**

**Whereas** the National Park Service, Department of Interior, announced in the Federal Register on March 14, 2003 , the availability of a draft Environmental Impact Statement and General Management Plan for Rock Creek Park, Washington, DC; and

**Whereas** the Environmental Impact Statement and General Management Plan evaluates the following four alternatives for Rock Creek Park: (1) Alternative A would generally retain the current scope of visitor uses with improvements in visitor safety and better control of traffic volumes and speeds through the Park by imposing a HOV 2 restriction during rush hour; (2) Alternative B would propose no actions at all; (3) Alternative C proposes to close three sections of Beach Drive to automobiles at all times and thereby eliminate traffic in much of the northern part of the Park; (4) Alternative D proposes to close three segments of Beach Drive in the northern portion of the Park to motorized vehicles for a 6 hour period during weekdays, from 9:30 am to 3:30 pm; and

**Whereas** Beach Drive is important to Mount Pleasant residents, lying along the western border of the neighborhood providing an important automobile link to downtown during the week, and a recreation area on weekends; therefore, let it be

**Resolved** that the Advisory Neighborhood Commission 1D opposes any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic, including a test closure.

<p><b>Dominic Sale 1D06</b> Chair Business District Committee</p>	<p><b>Mount Pleasant ANC1D</b></p>	<p><b>Barbara Bitondo 1D01</b> Secretary Latino Committee</p>
<p><b>Will Grant 1D02</b> Vice Chair Crime and City Services Committee</p>		<p><b>Jack McKay 1D03</b> Commissioner Traffic and Parking Committee, Children and Schools Committee</p>
<p><b>Peter Muller 1D05</b> Treasurer Permits and Zoning Committee</p>	<p>P.O. Box 43529 Washington, DC 20010 (202) 494-0630, anc1d@yahoo.com www.anc1d.org</p>	<p><b>Jenny Babcock 1D04</b> Commissioner Grants Committee Housing Committee</p>

July 14<sup>th</sup>, 2003

Adrienne Coleman  
Superintendent, Rock Creek Park  
3545 Williamsburg Lane NW  
Washington, D.C. 20008-1207

Dear Ms. Coleman:

Please find enclosed a copy of a resolution passed by the Mt. Pleasant Advisory Neighborhood Commission 1D. This resolution represents the official comment of the Mt. Pleasant ANC 1D regarding the draft Environmental Impact Statement and General Management Plan for Rock Creek Park.

The Mt. Pleasant ANC 1D is the elected body representing the Mt. Pleasant neighborhood of the District of Columbia to the District's agencies and to the city council.

The community of Mt. Pleasant is bordered on two sides by Rock Creek Park, and it will be significantly impacted by any changes made to the General Management Plan. Therefore, please consider this comment seriously when making any decisions regarding the General Management Plan for Rock Creek Park.

Sincerely,

Dominic Sale  
Chair, ANC 1D



Enclosures

<p><b>Dominic Sale 1D06</b> Chair Business District Committee</p> <p><b>Will Grant 1D02</b> Vice Chair Crime and City Services Committee</p> <p><b>Peter Muller 1D05</b> Treasurer Permits and Zoning Committee</p>	<p><b>Mount Pleasant ANC1D RESOLUTION</b></p>  <p>P.O. Box 43529 Washington, DC 20010 (202) 494-0630, anc1d@yahoo.com www.anc1d.org</p>	<p><b>Barbara Bitondo 1D01</b> Secretary Latino Committee</p> <p><b>Jack McKay 1D03</b> Commissioner Traffic and Parking Committee, Children and Schools Committee</p> <p><b>Jenny Babcock 1D04</b> Commissioner Grants Committee Housing Committee</p>
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July 7<sup>th</sup> 2003

**RESOLUTION**

**Opposing the alternative in the draft Rock Creek Park General Management Plan that would close three sections of Beach Drive to automobiles.**

**Whereas** the National Park Service, Department of Interior, announced in the Federal Register on March 14, 2003 , the availability of a draft Environmental Impact Statement and General Management Plan for Rock Creek Park, Washington, DC; and

**Whereas** the Environmental Impact Statement and General Management Plan evaluates the following four alternatives for Rock Creek Park: (1) Alternative A would generally retain the current scope of visitor uses with improvements in visitor safety and better control of traffic volumes and speeds through the Park by imposing a HOV 2 restriction during rush hour; (2) Alternative B would propose no actions at all; (3) Alternative C proposes to close three sections of Beach Drive to automobiles at all times and thereby eliminate traffic in much of the northern part of the Park; (4) Alternative D proposes to close three segments of Beach Drive in the northern portion of the Park to motorized vehicles for a 6 hour period during weekdays, from 9:30 am to 3:30 pm; and

**Whereas** Beach Drive is important to Mount Pleasant residents, lying along the western border of the neighborhood providing an important automobile link to downtown during the week, and a recreation area on weekends; therefore let it be

**Resolved** that the Advisory Neighborhood Commission 1D opposes any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic, including a test closure.

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<p><b>Dominic Sale 1D06</b> Chair Business District Committee</p> <p><b>Will Grant 1D02</b> Vice Chair Crime and City Services Committee</p> <p><b>Peter Muller 1D05</b> Treasurer Permits and Zoning Committee</p>	<p><b>Mount Pleasant ANC1D</b></p>  <p>P.O. Box 43529 Washington, DC 20010 (202) 494-0630, anc1d@yahoo.com www.anc1d.org</p>	<p><b>Barbara Bitondo 1D01</b> Secretary Latino Committee</p> <p><b>Jack McKay 1D03</b> Commissioner Traffic and Parking Committee, Children and Schools Committee</p> <p><b>Jenny Babcock 1D04</b> Commissioner Grants Committee Housing Committee</p>
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**For Immediate Release**  
Contact: Barbara Bitondo (202-299-9418)  
July 13<sup>th</sup> 2003

**KEEP BEACH DRIVE OPEN,  
URGES MT. PLEASANT ANC**

"We oppose any and all changes in the Rock Creek Park General Management Plan that proposes to close Beach Drive to automobile traffic, including a test closure," stated Mt. Pleasant Advisory Neighborhood Commission 1D in a resolution passed on July 7<sup>th</sup>, 2003.

The resolution responds to the draft Environmental Impact Statement and General Management Plan issued by the National Park Service on March 14<sup>th</sup>, 2003. The draft plan outlines four alternatives for managing traffic in Rock Creek Park. Three of the four alternatives would impose significant traffic restrictions on Beach Drive, and one proposal would completely close three portions of the road to automotive traffic. The National Park Service is currently soliciting commentary on the proposals.

The community of Mt. Pleasant is bounded on its north and west sides by Rock Creek Park. Beach Drive is one of the only north-south arteries easily accessible to Mt. Pleasant residents.

"Beach Drive links Mt. Pleasant residents with the District's downtown on weekdays, and with recreational opportunities on weekends," explains Commissioner Barbara Bitondo, the sponsor of the resolution. "In addition,

closing Beach Drive would also block our access to emergency evacuation routes."

The resolution was passed unanimously by all commissioners in attendance.

The Mount Pleasant ANC is an elected body representing the residents of Mt. Pleasant. It advises D.C. government agencies and the city council on issues involving its constituents, and is a formal part of the D.C. government. The commission holds public meetings on the first Monday of each month at 7:30 pm at 3166 Mount Pleasant Street N.W.

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MS. COLLINS: My name is Laurie Collins. My address is in D.C. However, I'm here tonight to speak on behalf of the Mount Pleasant Neighborhood Alliance, a community association in Ward One of Mount Pleasant with a membership of approximately 500 residents. MPNA supports Alternative B as the preferred alternative for the following reasons.

Rock Creek Park's roadway not only make the scenic vistas, picnic areas, and hiking and biking trails of the park readily available to the public but they also serve as major transportation arteries within the District. As a roadway, residents of Mount Pleasant use Beach Drive all the time as a preferred alternative to other roads such as Connecticut Avenue and 16<sup>th</sup> Street to travel uptown and downtown. It is possible to drive from Mount Pleasant to Maryland and back again and only ever go through one traffic light while having a much more enjoyable travel experience than one would have on other congested, multi-lane routes.

Any new vehicular restrictions on Rock Creek Park's roadways would divert substantial traffic to other existing major north-south routes in the city such as 16<sup>th</sup> Street, 14<sup>th</sup> Street, Connecticut Avenue, Massachusetts, and Wisconsin. Such restrictions would add even more congestion to already severely overburdened major thoroughfares and our adjacent residential streets. The District and its citizens already suffer from the adverse transportation, economic, and environmental impacts of other federally imposed vehicular traffic restrictions. We don't need to add another.

If there is an identified need for more paved biking trails, then the answer is not to exclude the majority of current users from our historic parkways. Instead we need to look at enhancing existing trails or making new ones. The Park Service's own recommendations suggest that separate bikeways are the safest alternative. We may be able to enhance some of the under-utilized trails or create new paved trails away from the roadways.

We strongly oppose NPS's plan which would exclude automobiles from recreational daytime use of Beach Drive. We also strongly opposed any proposed testing of any closure alternative. Beach Drive and the other parkways in Rock Creek Park were created to provide broad public access to its beauty and should not be converted to commuters only roads or worse closed to traffic all together. Further restricting Beach Drive is another step toward completely eliminating the traditional and historic experience of touring Rock Creek Park and also would rob the public of cultural resources that so many D.C. residents and visitors have enjoyed and cherished.

Rock Creek Park is a national park dedicated for all people and was designed by Frederick Law Olmstead, Jr. with scenic parkways for driving and other amenities for picnicking, hiking, and horseback riding throughout its vast distances. As such, the park was designed as an inclusive facility accessible to all. The bicycle path was created in the late '70s and is enjoyed by many walkers, strollers, bicyclists, and skaters. While it may make sense to accommodate these additional recreation uses, it is not fair to do so at the expense of the vast majority of users and also contrary to the original intent and dedication of the park.

Further, the NPS preferred alternative does not have the support of the community-at-large. On the contrary, a community ground swell opposes blocking Beach Drive. This broadly based grassroots uprising against the National Park Service plan is based in many sound principles including sensible transportation policies, fairness, enhanced public safety, and respect for culture and history.

The NPS plan to close Beach Drive does a disservice to the public in favor of special interest politics. It is one thing to oppose a new roadway construction through established neighborhoods and green space. It is quite another for fringe special interest groups to take away our public roads for the benefit of a few.

These efforts cross the line from appropriate influence of public policy to self-serving pilferage of public property. As we have seen with Klinge Road, if control of Beach Drive is given over to marginal special interests, it may be lost forever. It is the sense of the Mount Pleasant Neighborhood Alliance that the current management plan for Rock Creek has been sufficiently successful and serves a purpose that generally benefits the citizens. The paraphrase Chris Brown, Chief, National Park Service, Rivers, Trails, and Conservation Assistance Program "Parkways are many things to many people, and that's one of their virtues." Thank you.

**NEAL R. GROSS**  
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WASHINGTON, D.C. 20005-3701

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July 15, 2003

Ms. Adrienne Coleman, Park Superintendent  
National Park Service, Rock Creek Park  
3545 Williamsburg Lane NW  
Washington, DC 20008-1207

Dear Superintendent Coleman:

Thank you for the opportunity to provide comments on the Rock Creek Park & Rock Creek and Potomac Parkway Draft General Management Plan. The following are submitted on behalf of the more than 300,000 members of the National Parks Conservation Association (NPCA). Founded in 1919, NPCA is America's only national private, nonprofit advocacy organization dedicated solely to protecting, preserving, and enhancing the National Park System.

**America's largest natural national park in an urban area:** Rock Creek Park was established in 1890 "as a public park or pleasure ground for the benefit and enjoyment of the people of the United States." It not only provides a forested oasis in the nation's capital, but also a window into the area's human history. It offers a variety of recreational opportunities to the region's 4.2 million residents, in addition to opportunities for studies of natural and human history.

Rock Creek Park faces numerous challenges due to its extended, irregular configuration; encroachment on its borders by private development; invasive plant and animal species; its use in recent decades as a commuter thoroughway; and storm water drainage into Rock Creek and its tributaries.

**Commuter traffic threatens park resources:** The key issue the draft GMP seeks to resolve relates to traffic on Beach Drive in the northern area of the park. Beach Drive was originally designed to provide recreational access to Rock Creek valley. Until 1966, motor vehicle traffic on Beach Drive included fording Rock Creek in several places, so few would have considered that drive for purposes other than to visit the park. With completion of the tunnel near the National Zoo and bridges over the fords, Rock Creek Park became a thoroughway to other destinations, and not solely a destination. In 2002, of the park's more than 14 million visitors, more than 12 million were simply driving through. (NPS Statistical Abstract, 2002)

Restoring Rock Creek Park and managing it for its natural and historical resources are in direct conflict with its use as a commuter thoroughway. NPCA supports application of traffic calming measures as proposed in the draft GMP, and additional measures to reduce commuter traffic in the park. Closing Beach Drive to motorized vehicles during weekday non-rush hour periods as proposed in Alternative D is a reasonable interim step towards reducing traffic in the park.

Weekend closures of Beach Drive have provided an unbroken paved trail from Memorial Bridge across the Potomac River to the Maryland line, linking the park to an expanding regional network of trails, and successfully encouraged non-motorized recreational use. There is no parallel trail in the subject area. Due to the steep, rocky character of Rock Creek Gorge, in addition to severe funding shortfalls for park projects generally, construction of a separate trail is unlikely.

However, if the park seeks to restore Rock Creek Park and fulfill its purpose and potential as a functioning natural ecosystem and a haven for wildlife in addition to a scenic and recreational park, area decision makers and the public must work with the park to support measures to remove commuter traffic from the park, and to manage storm water in ways other than simply letting it dump into the creek and its tributaries.

**Raising the profile of the region's model network of parks could improve multi-modal transportation options:** We are encouraged that the NPS is working with the City of Washington on planning for the DC Circulator, and has included Rock Creek Park in the transportation planning process for the National Capital Region. We urge the NPS to pursue multi-modal transportation alternatives that serve as many parks as possible throughout the greater metropolitan area, including Rock Creek Park. Even though the NPS study is geared towards visitors, it could serve local residents to some degree also.

Local authorities and the Park Service have spent tens of millions of dollars already creating and enhancing a regional network of paved trails, many through the various units in the National Capital Region like Rock Creek Park. This kind of continuous alternative transportation option that converges at the monumental core provides a perfect example of a model network of parks. Model parks represent a variety of

transportation challenges and needs typical across the National Park System. They should receive funding to implement innovative strategies for improving congestion, cleaning the air, minimizing resource impacts, and providing a quality experience for park visitors.

**Park signage could help cultivate new park supporters:** NPCA encourages the NPS to expand and enhance interpretive services to market this regional network of parks, and to include more educational signage relevant to the park's many visitors who speak Spanish. Currently, the only signs in Rock Creek Park in Spanish are disciplinary ("no drinking" or "keep out"). The lack of signage in Spanish excludes a growing percentage of visitors from the benefits of interpretation, and misses the opportunity to cultivate a new generation of park users as park supporters.

Thank you again for this opportunity to comment.

Sincerely,

Jessica Butts

National Parks Conservation Association

MS. COOPER: Hi. My name's Barry Cooper. I represent the Neo-Tropical Bird Club. I live in Silver Spring, Maryland.

I really came to present tonight, because I was concerned with one element of the management plan, and basically I'm echoing the previous speakers. My wife's concerns regarding the potential development of the rough meadow behind the maintenance yard to an administrative building.

The person who wrote the comments on your management plan states the actions would be in an already disturbed area with low habitat value and would have little effect on wildlife. Well, I'm afraid that person was not fully aware of the value of that meadow, which is situated in the center of this beautiful pristine upland hardwood forest and is an absolute magnet for neo-tropical bird migrants that pass through, actually, in the tens of thousands.

And if I could just quote from a book written by world renown ornithologist Claudia Wilds, who actually lived in the District of Columbia where she references Rock Creek Park. And she mentions the high ridge, the western ridge, on the west bank of Rock Creek Park between Broad Branch and Military Road is the best wobbler trap in the park. And also specifically addressing the maintenance yard field. "This is the best field habitat in the park."

The statements of the importance of this field based on approximately ten years of spring and autumn neo-tropical migrant bird surveys that Dr. MacKiernan and I have conducted using our most recent surveys for the spring of 2003, we have visited the area and surveyed the birds in the hardwood forests around the nature center and particularly the maintenance yard on 23 days this spring, totaling over 100 hours. And we have surveyed and counted over 20,000 species of neo-migrants. This includes virtually all the warblers, flycatchers, veros, thrushers that occur in northeastern United States and Canada. Nineteen of these species are listed in your management report as being threatened by the state of Maryland's Department of Natural Resources. Two of these species have also been listed as threatened by 13 northeastern states, their natural resources. These are the Canada wobbler and the gold wing warbler. And one species of the warbler is presently proposed for listing under the Endangered Species Act.

I can assure that you species occurs in the immediate vicinity of the maintenance yard. And also if it is accepted under the Endangered Species Act, I think it'll have serious implications for managing its habitat.

That's basically all I've got to say.

I just would end by absolutely recommending the preservation and enhancement of a rough meadow in the maintenance yard as a critical environmental habitat and absolutely do not move forward with the proposed destruction of this habitat as outlined on page 182 of your management plan.

**NEAL R. GROSS**  
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WASHINGTON, D.C. 20005-3701

From: Barry E. Cooper

National Park Service, Rock Creek Park  
Superintendent  
3545 Williamsburg Lane, N.W.  
Washington D.C. 20008-1207

Re: Comment on the Draft General Management Plan/Environmental Impact Statement, Rock Creek Park and Potomac Parkway.

My comments are quite limited, and directed to the preservation of the Park's natural resources. In this regard, I note that the National Park Service's first Mission Goal is as follows: "The natural and cultural resources and associated values of Rock Creek Park are protected, preserved and maintained in good condition and managed within their broader ecosystems or cultural context." [see P.14 of the Draft General Management Plan].

I fully support and agree with this Mission Goal and wish to discuss this in the context of one of Rock Creek Park's most important natural resources: the spectacular concentration and diversity, both spring and autumn, of neotropical bird species which migrate through the Park. Please see the attachment for the most recent data on this phenomenon. The following is a brief summary:

- Thirty-four species of warblers are recorded on migration during most springs and/or autumns at RCP, out of a total of thirty-five species that occur in northeastern U.S.A and Canada. Several of these species are ranked by the Maryland Dept. of Natural Resources at various levels of concern [see page 331-2 of the draft General Management Plan], two species are considered to be threatened per the Northeast Endangered Species and Wildlife Diversity Technical Committee and one species, Cerulean Warbler, has been proposed for listing under the Endangered Species Act.
- All six vireo species that occur in northeastern USA and Canada are recorded regularly each Spring and/or autumn at RCP.
- This spring all seven thrush species that occur in northeastern USA & Canada were recorded at RCP. This includes one species, Bicknell's Thrush, that is a candidate for listing under the Endangered Species Act.
- About sixty species of neotropical birds were recorded at RCP during our 2003 spring survey totaling at estimated 30,000+ individual birds. These birds were counted in an approximate one-half mile square area with its center in the RCP Maintenance Yard (thus the actual number along the west ridge would be considerably larger). Many of these species are experiencing very serious population declines both

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within the Washington Metropolitan Area and throughout much of the northeastern USA.

As is quite clear from our data the West Ridge of RCP and in particular, the rough meadow habitat at the rear of the Maintenance Yard is an extremely important feeding and resting area for a large number of neotropical birds.

It therefore came as a major concern that on page #182 of the draft General Management Plan and Environmental Impact Statement the following was stated: "If suitable commercial space cannot be located outside the park, new park administrative or U.S.Park Police facilities could be constructed at the park maintenance yard or the H-3 stables area respectively. **These actions would be in already-disturbed areas with low habitat value and would have little effect on wildlife.**" [emphasis mine]

While the rough meadow area of the Maintenance Yard appears untidy and superficially may appear to be of very low habitat value, the opposite is actually the case. Most neotropical migrants fly during the night and at dawn are searching for suitable habitat to feed and rest during the daytime. Rock Creek Park's forest and adjacent vegetation provides vital fruit, seeds and insects for migrants. Particularly attractive to many species are the bushes, vines and grasses found in meadow and forest edge environments, which are increasingly rare in Washington's urban setting. The Maintenance Yard, cited in Claudia Wild's book [Finding Birds in the National Capital Area] as the "best field habitat in the Park," is a prime example of this type of environment. This is based not only on over ten years of detailed survey work but on the observations of many other individuals. It is perhaps not unexpected that some of the most unusual migrants ever recorded in Rock Creek have appeared (and stayed, sometimes for many days) in this rich feeding area. These include Clay-colored Sparrow, Lark Sparrow, Sedge Wren and Mountain Bluebird. Rather than destroying this unique area, it is recommended the National Park Service take steps to preserve and enhance this habitat.

(Attached is the summary data from our migration survey, spring, 2003)

**ROCK CREEK BIRD MIGRATION – SPRING, 2003**

April 16th – May 22, 2003

Barry E. Cooper

Gail Mackiernan and Barry Cooper have been undertaking surveys of bird migrants [predominantly neotropical species] that pass along Rock Creek Park's West Ridge every spring and fall for the past ten years. It is estimated that approximately 150 observer hours were spent conducting this survey during the Spring, 2003.

Migratory bird surveys were conducted on 25 days during this 42-day period. The count area consisted of approximately one half-mile square, with the center being the Rock Creek Maintenance Yard. The majority of the neotropical & other migrant bird species listed below, therefore, were surveyed either in the Maintenance Yard or in its immediate vicinity. These migrant birds are surveyed during the first 3-4 hours after dawn and are typically observed in large rapidly moving flocks. As such we estimate that we identify not more than 25% of the total birds present on any given day. *Therefore, the actual total number of migrant birds moving through the Maintenance Yard area during the days surveyed is well in excess of 20,000 individuals.*

Moreover, the migrant birds are moving through this area, at varying levels, throughout the Spring [not just on the days surveyed]. As our survey was conducted on only about 60% of the days during the peak period of spring migration, the true number of neotropical and other migrant birds passing through the Maintenance Yard and its immediate vicinity is even larger. Using our survey data [see below] and extrapolating for the days when no survey was made, the estimated number of neotropical and other migrant bird species utilizing the Maintenance Yard and its immediate vicinity is an incredible 33,000 individual birds.

Even this does not address the complete picture, as many shorter distance migrant species such as White-throated Sparrow, Cedar Waxwing, Blue Jay American Robin [to name just a few] move through this important area each spring and autumn. These species are not covered by our survey work but number in the hundreds on many days. If these birds were also enumerated, the total number of migrants moving through the Maintenance Yard and vicinity during the spring migration would increase by many thousands of individual birds.

These numbers are very large and illustrate the high biological importance of both the Maintenance Yard and the whole of the West Ridge for migratory bird species in the spring.

Migratory bird numbers utilizing this area are even greater in the fall when, in addition to the adult birds, many birds that were raised during the summer breeding season are now passing through Rock Creek Park.

Several species recorded each spring in the Maintenance Yard are listed by the Maryland Dept. of Natural Resources as being threatened or endangered and two species is presently under consideration for listing under the Endangered Species Act.

Species	Total number of birds/ days recorded
Yellow-billed Cuckoo	79/ 14
Black-billed Cuckoo	12/8.
Ruby-throated Hummingbird	13/9
Eastern Wood-Pewee	26/7
*Olive-sided Flycatcher	2/2
Acadian Flycatcher	14/8
*Least Flycatcher	4/4
Great Crested Flycatcher	30/13
Eastern Kingbird	18/7
Red-eyed Vireo	420/20
Ruby-crowned Kinglet	42/8
Blue-Gray Gnatcatcher	220/20
Wood Thrush	115/19
Swainson's Thrush	37/12
Grey-cheeked Thrush	8/3
Bicknell's Thrush	1/1 This species under consideration for ESA listing by USFWS.
*Hermit Thrush	19/4
Veery	19/9
White-eyed Vireo	15/9
Yellow-throated Vireo	4/4
Blue-headed Vireo	18/8
Red-eyed Vireo	350/19
Warbling Vireo	2/2
Blue-winged Warbler	7/4
*Golden-winged Warbler	1/1 This species is considered to be threatened per the Northeast Endangered Species & Wildlife Diversity Technical Committee [formed by 13 northeastern states' wildlife agencies].
"Brewster's" Warbler	1/1
Tennessee Warbler	7/6
Orange-crowned Warbler	1/1
*Nashville Warbler	16/9
Northern Parula	152/17
Black and White Warbler	96/18 (collection of nesting material observed at two separate locations)
Black-throated Blue Warbler	186/17
Cerulean Warbler	3/2 (recently proposed for ESA listing by USFWS)
*Blackburnian Warbler	21/10
Chestnut-sided Warbler	66/13
Cape May Warbler	7/4
Magnolia Warbler	127/19
Yellow-rumped Warbler	2000/22

Black-throated Green Warbler	92/15
Prairie Warbler	2/2
Bay-breasted Warbler	17/8
Blackpoll Warbler	220/20
Pine Warbler	* 1/1
Palm Warbler	31/9
Yellow Warbler	13/11
*Mourning Warbler	4/4
Kentucky Warbler	* 2/2
*Canada Warbler	52/12 This species is considered to be threatened per the Northeast Endangered Species & Wildlife Diversity Technical Committee
Wilson's Warbler	20/9
Hooded Warbler	6/5
Worm-eating Warbler	6/4
Ovenbird	151/19
Louisiana Waterthrush	3/3
Northern Waterthrush	4/4
Common Yellowthroat	132/22
Yellow-breasted Chat	1/2
American Redstart	110/20
Rose-breasted Grosbeak	16/6
Blue Grosbeak	2/2
White-crowned Sparrow	1/2
Lincoln's Sparrow	6/4
Baltimore Oriole	15/6
Bobolink	7/4
Scarlet Tanager	183/22
Summer Tanager	1/1

\* These species are listed on Table E.4: State Listed Animal Species in Maryland on Pages 331-2 of Rock Creek Draft General Management Plan.

[REDACTED]

The People's Alliance for Rock Creek

The People's Alliance for Rock Creek

<http://www.rockcreekpark.net/faqs.htm>



Frequently Asked Questions

**Beach Drive Recreation Zones FAQs**

- Q: What would the Park Service preferred option do to Beach Drive?
- Q: What portions of Beach Drive would be affected?
- Q: Why can't all Park users share the road as they do now?
- Q: Why not just build a paved trail along Rock Creek in this section?
- Q: Won't closing these sections to auto traffic create traffic problems in surrounding neighborhoods?
- Q: What about the need for evacuation routes from the city in case of emergency? Won't this proposal block an important evacuation route?
- Q: What about car access to sites in the Park?
- Q: What about East-West traffic crossing the Park?
- Q: Won't this proposal deprive the elderly and handicapped from accessing the Park?

- [PARC Home](#)
- [Take Action](#)
- [Volunteer Now](#)
- [General Management Plan](#)
- [10 Great Things to do in Rock Creek National Park](#)
- [PARC FAQ's](#)  
(updated 05-15-2003)
- [The Case for Weekday Recreation Zones - in pictures](#)
- [Political Endorsements](#)
- [Traffic Study](#)

- Q: What would the Park Service preferred option do to Beach Drive?  
A: The Park Service proposes to restrict auto traffic on three sections of Beach Drive in order to allow recreational use of the road on weekdays from 9:30 AM to 3:30 PM.
- Q: What portions of Beach Drive would be affected?  
A: The same three sections now closed to motor vehicles on weekends – a 2-mile section from Broad Branch Road to Military Road, and two shorter sections north of Military.
- Q: Why can't all Park users share the road as they do now?  
A: Park users don't share the road now, because it's too dangerous. North of Broad Branch Road, the only pavement in the valley is Beach Drive, a narrow road with 9 substandard/blind curves that contribute to a high accident rate. While traffic volumes on the road are quite low during non-rush hour periods, the road is too narrow and the curves too blind to permit pedestrian access. As a result, there is no safe way for families with children, skaters, dog walkers, runners, cyclists, etc. to access this part of the Park unless traffic is restricted.
- Q: Why not just build a paved trail along Rock Creek in this section?  
A: There is not enough room in the narrow rocky gorge above Pierce

Enter your email

Zipcode

Ward/District

Name

Contact Us



Mill to construct a trail without irreparably damaging the creek and the Park.

Q: Won't closing these sections to auto traffic create traffic problems in surrounding neighborhoods?

A: No. Only 150-250 cars per hour use Beach Drive in each direction during the hours in question. Spread over at least four parallel routes on both sides of the Park, there will be no noticeable impact on traffic.

For example, Connecticut Avenue now carries about 32 cars per minute during non-rush periods. Under the proposal, an additional 2 cars per minute would be added to the load, bringing it to 34. This compares to 65 cars per minute on Connecticut during rush hour. Similarly, other roads paralleling the Park will see increases of 2 or fewer cars per minute.

Q: What about the need for evacuation routes from the city in case of emergency? Won't this proposal block an important evacuation route?

A: No. This proposal has no effect on the availability of Beach Drive as an evacuation route, because no permanent barriers would be built. To reopen the road to auto traffic, all one would need to do is swing open the temporary gates. This takes less than one minute.

Q: What about car access to sites in the Park?

A: Auto access to virtually all picnic areas, the golf course, the stables, and tennis courts would be preserved, just as it is now on weekends.

Q: What about East-West traffic crossing the Park?

A: All East-West routes would remain open to cars under the Park service proposal.

Q: Won't this proposal deprive the elderly and handicapped from accessing the Park?

A: No. In fact, it will improve access for the elderly and handicapped by permitting them to use the only smooth surface in the valley without fear of traffic. For those who only wish to drive through the valley, the proposal still leaves 18 hours per weekday when all sections of Beach Drive will be open to cars. In addition, more than 90% of the roads in the Park will remain open to cars at all times.

African American Environmentalist Association · American Discovery Trail Society · American Hiking Society · American Lung Association of DC · American Running and Fitness Association · Anacostia

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The People's Alliance for Rock Creek

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Watershed Society · Audubon Naturalist Society · Bicycle Federation of America · Coalition for the Capital Crescent Trail · Center for Environment, Commerce, and Energy · Center for Renewable Energy and Sustainable Technology · College Park Area Bicycle Coalition · Committee of 100 on the Federal City · Crestwood Neighborhood League · DC Bicycle Courier Association · DC Clean Air Network · DC Statehood Green Party · DC Road Runners Club · DC Velo Club · Friends of Meridian Hill · Friends of the Earth · Friends of the Rock Creek Horse Centre · Friends of the W&OD · Institute for Local Self Reliance · International In-line Skating Association · Latin American Youth Center · League of American Bicyclists · Mid-Atlantic Off-Road Enthusiasts · Montgomery County Outdoor Education Association · Montgomery County Road Runners Club · The Potomac Conservancy · Potomac Pedalers Touring Club · Rails to Trails Conservancy · Reed-Cooke Neighborhood Association · Road Runners Club of America · Scenic America · Sierra Club / Montgomery County Group · Trash Force · Urban Rangers · Virginia Bicycling Federation · Walk DC · Washington Area Bicyclist Association · Washington Area Rollerskaters · Washington Parks and People · Washington Regional Network for Liveable Communities

MR. MCCARTHY: My name is Jim McCarthy, M-C-C-A-R-T-H-Y. I live in Chevy Chase, D.C. I'm speaking as coordinator of the People's Alliance for Rock Creek which is a coalition of more than 30 organizations with more than 50,000 members in the Washington area who support the National Park Service plan Alternative D.

I want to commend you for taking this step which I know from the comments here tonight was not an easy one. It is a tremendous step forward in terms of restoring the balance of values in the park and treating the park as a park rather than simply a thoroughfare. There have been a number of people commenting about the history of the park and the fact that it was set up in 1890 and that as part of the legislation the words "scenic drives" were mentioned.

That's a very interesting point and an appropriate point to raise. But as we all know, in 1890, the automobile had not been invented yet. So the scenic drives that were referenced by Congress at that time were scenic drives in horse-drawn carriages at probably less than 10 miles per hour. This is not what is occurring in the park today. In the park today, people are driving 35 to 40 miles an hour around blind curves in cars that have their windows closed who cannot experience the park in any meaningful way. They are simply using the park as a roadway.

One of the reasons they do that is because in the 1960s in a rather mistaken move a tunnel was built at the zoo which turned the park from a destination itself and a place in which people did recreation into a thoroughfare. It linked Beach Drive which at that point was essentially a rural experience - you had to drive through the creek at many places in order to continue on the road - with Rock Creek Parkway making it available as a commuting road. This entirely changed the character of the park, made it impossible for people to use Beach Drive during the week for recreational purposes, and as a result we're here today trying to deal with the impacts of that and trying to restore that balance.

I wanted to say something also about cars. Most of us use cars to get to Rock Creek Park. Many of us drive through the park at various times. Driving through the park is a pleasant experience. There's no doubt about that. But the presence of cars on the upper portions of Beach Drive make any other use of that roadway impossible. The road is designed as a scenic drive. There are nine blind curves simply between Broad Branch and Military Road.

If you are a cyclist, a rollerblader, a runner, you never know what's coming around one of those blind curves. It means that there are very few people who use that part of the park for recreation during the week. I hear people commenting who would use it. I've been down there. I've seen it. No one is running on that road. No one is using it for bicycling.

Well, there's a reason. It's too hazardous. Only by doing something like Alternative D will the Park Service restore a balance and make it possible to use this tremendous asset that is Rock Creek Park as the asset it was intended to be as recreational and a place that restores our soul. I want to thank you very much for this public meeting and a chance to offer comments. We will submit detailed, written comments before July 15. Thank you very much. We applaud you very much in choosing Alternative D.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS  
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WASHINGTON, D.C. 20005-3701

MR. HARNIK: Good evening. I'm Peter Harnick. I'm the original founder of the People's Alliance for Rock Creek Park, not the one from 1996, but the original People's Alliance for Rock Creek Park back in 1980. And I actually want to dedicate my testimony to James Redmond. Some of you may remember. Jim Redmond was the Superintendent of Rock Creek Park in the 1970s. Jim was the guy who took the leap to say let's see what we can do with this park, let's open this up for the weekend people use on upper Beach Drive.

A lot of the speakers that have spoken for the last couple of nights have, you know, treat the weekend closures like well this is no big deal. Of course, the weekend is fine and its non-controversial. But they don't remember what happened back in 1980 that the weekend closures were extremely controversial, as controversial as this, if not more. Nobody had ever conceived of a park without cars in it.

And Jim held these hearing, somewhat similar to what's going on now. There was a lot of back and forth. He said let's give this a try. If it doesn't work, we'll do something different. And he did give it a try and it was phoneminally successful and it was successful enough to actually increase the hours from Sundays to Saturdays and Sundays, to Saturday, Sundays and holidays. And I think we all agree that it's the busiest most people oriented and people used section of the park.

And so I commend you—it's take a long time. It's taken too long, but I commend you for taking this step. I support alternative D. Let's give it a try. As a bicyclist I'd prefer that you did more, but let's go ahead and take this leap and see how it works.

And if it doesn't work, we'll try something different.

I think this is a great idea. It's great for the park.

In my day job I study city parks around the country and I've made a particular—pay particular attention to what goes on with cars in parks. And I think I can say that without exception every single car park that has eliminated portions or entirely eliminated cars from the park has been significantly improved by doing that.

Central Park in New York. Total turnaround in that park from being dangerous, shunned to being a fabulous place that's used by millions of people. Prospect Park, Piedmont Park in Atlanta, many other locations.

So I think what you're doing is terrific. I think it's going to make the park better.

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And I guess my one suggestion where I think the Park Service falls down badly on the job is that your signage is so weak, poor and nonexistent that most Washingtonians are confused most of the time about where things are and how the park works. And if you put in a decent signage system—you'd—I think you'd get much more support for this entire proposal.

**NEAL R. GROSS**  
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WASHINGTON, D.C. 20005-3701

**PEOPLE'S ALLIANCE FOR ROCK CREEK (PARC)**  
African American Environmentalist Association \* American Discovery Trail \* American Hiking Society \*  
Anacostia Watershed Society \* Audubon Naturalist Society \* Coalition for the Capital Crescent Trail \*  
Center for Environment, Commerce, and Energy \* College Park Area Bicycle Coalition \* DC Bicycle Courier Association  
DC Clean Air Network \* DC Statehood Green Party \* DC Velo Club \* Friends of Meridian Hill \* Friends of the Earth \*  
Friends of the W&OD \* International In-line Skating Association \* Montgomery County Outdoor Education Association  
Metroped, Inc. \* Montgomery County Road Runners Club \* Potomac Pedalers Touring Club \* Rails to Trails Conservancy  
Reed-Cooke Neighborhood Association \* Reston Bike Club \* Sierra Club of Montgomery County \* Sustainable Montgomery  
The Potomac Conservancy \* Trash Force \* Virginia Bicycling Federation \* Washington Area Bicyclist Association \*  
Washington Area Rollerskaters \* Washington Parks and People \* Washington Regional Network for Liveable Communities

July 15, 2003

Ms. Adrienne Coleman  
Superintendent, Rock Creek Park  
National Park Service  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008-1207



Dear Superintendent Coleman:

Attached are comments on the Draft General Management Plan for Rock Creek Park, prepared for the People's Alliance for Rock Creek (PARC). These comments were prepared by Jim McCarthy and Rick Morgan, Coordinators of PARC.

We would be happy to answer any questions regarding these comments. You can reach Mr. McCarthy at (202) 362-7614 or Mr. Morgan at (202) 364-3663. We look forward to working with you as you implement the preferred alternative.

Sincerely,

Jim McCarthy  
Coordinator

COMMENTS OF THE PEOPLE'S ALLIANCE FOR ROCK CREEK ON THE DRAFT  
GENERAL MANAGEMENT PLAN FOR ROCK CREEK PARK

The People's Alliance for Rock Creek (PARC) is an alliance of 33 local and national groups that support enhanced recreational opportunities and facilities and better environmental protection in Rock Creek Park. A full list of the organizations supporting PARC is attached to these comments. In addition to supporting PARC, many of these organizations will be submitting their own comments.

**PARC views the impact of car traffic on Rock Creek Park, and the continued management of Beach Drive to facilitate the movement of automobiles through the Park as major problems.** Therefore, we applaud the National Park Service for its proposal to begin addressing this issue, and **we support your proposal to adopt Alternative D**, providing for weekday closure of portions of Beach Drive to allow its use for recreational purposes.

**We believe your proposal (as well as Alternatives C and A) are in line with the Park Service's mission** to "provide for the preservation from injury or spoliation of all timber, animals, or curiosities within said park and their retention in their natural condition, as nearly as possible," (1890 legislation establishing the Park) as well as the National Park Service Organic Act and other legal mandates. **Adoption of Alternative B, with its failure to take any steps to address the problem of traffic, would be to fail in that mission.**

In addition to organizing the efforts of its supporting organizations, PARC has been the main point of outreach to the public in favor of Alternative D during the General Management Planning comment period. We organized an information table in Rock Creek Park on weekends beginning in late April, and more than 1,000 Park users stopped at this table to express their support for enhanced recreational access to Beach Drive on weekdays. Attached to these comments are copies of postcards supporting Alternative D signed by 1,105 of these visitors, many of whom added comments and suggestions in addition to signing. PARC's experience operating this table has confirmed that **recreational users of the Park are overwhelmingly in favor of your proposal to establish weekday recreational zones.**

These comments are organized in five sections. First, we express our support for Alternative D and explain why we believe the establishment of weekday recreational zones in Rock Creek Park is important. Second, we address other issues raised (or, in some cases, not raised) by the General Management Plan. Third, we address issues raised by opponents of Alternative D. Fourth, we address technical issues, including what we believe is a major error in the plan's traffic analysis, which has resulted in an overstatement by the National Park Service of the number of cars that would be displaced by closing portions of Beach Drive. Finally, we discuss our continued belief in the need for a test of alternatives, and we agree with the Park Service that the plan must allow operational flexibility.

**1. Why We Support Alternative D.** Rock Creek Park was established in 1890 "as a public park or pleasure ground for the benefit and enjoyment of the people of the United States." Although roads were laid out in the Park at an early date for use by horses, carriages, bicycles, and eventually automobiles, the Park was essentially a quiet natural oasis in the

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middle of the city until the mid-1960s. Auto travel on Beach Drive was slow and cumbersome during this period, requiring fords of the creek in several places. Few people commuted by car during these years, and most of those who did would have avoided the Park because of the slowness and difficulty of driving in it.

In the 1960s, however, the completion of the Zoo tunnel and the replacement of the last of the fords through Rock Creek brought a dramatic change in the character of the Park. Rather than serve primarily as a destination in itself, the Park became a place to pass through on the way to somewhere else. By the 1990s, 12.4 million trips through the Park were occurring annually, while only 2.1 million visitors actually stopped to visit (statistics are from p. 142 of the draft GMP).

In the early 1980s, at the suggestion of PARC, the National Park Service took a major step toward restoring the balance of uses in the Park, initiating weekend closures of three sections of Beach Drive so that they could be used by cyclists, pedestrians, and other recreational users. By closing the three sections, the Park Service created an unbroken paved trail extending the entire length of the Park, encouraging non-motorized use. These steps were opposed by many, who argued (then, as now) that the closure of Park roads at any time would disrupt traffic, make it more difficult to access the Park, and create negative spillover effects in surrounding neighborhoods as autos searched for alternative routes.

But the concerns proved unfounded. Traffic on surrounding roads and access by car to the Park's other attractions were largely unaffected by the closures. And **car-free sections of Beach Drive were a phenomenal success: the recreational use of the road on weekends became a major reason for people to visit Rock Creek Park. In the 1990s, 2,075,000 visitors came to the Park for recreation, nearly double the 1980 figure of 1,060,000.** (p. 143) Visits to the Park's historic and educational facilities declined during this period. PARC concludes that it was the closure of Beach Drive that was the major factor in increasing visits to the Park.

Alternative D would close the same three sections of upper Beach Drive to through traffic for six hours every weekday. We support this Alternative for several reasons. First, **establishment of recreational zones will provide access to the scenic heart of the Park for runners, cyclists, and pedestrians on weekdays for the first time.** This is an important step toward restoring the balance in Rock Creek Park, which is dominated by auto use Monday through Friday. Second, there is no parallel trail in the areas that would be closed. **Without road closure, the Park's north-south paved trails are fragmented and discontinuous,** making them less likely to be used. Road closure provides the missing link in the trail system, making the entire system more usable. Third, some have suggested that the Park Service address the need for better non-motorized access to these areas by simply building a trail in the areas affected by the proposed closures. That course is prohibited, in our view, by the steep, narrow topography of the Rock Creek gorge. Trail construction, if it were possible, would do immense damage to the environment and would obliterate scenic views that the Park was established to protect. **To connect the trails, closure of the three segments of Beach Drive to auto traffic, as envisioned by Alternatives C or D, is the only environmentally acceptable and practical solution.**

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By closing these sections, Alternative D will create an unbroken paved path from Memorial Bridge to the Maryland line, linking the Park to an expanding regional network of paved trails that local authorities and the Park Service have spent tens of millions of dollars developing. Currently, these trails run from Mount Vernon to Lake Needwood, via the Park, except for the missing sections; from Georgetown to Rosemary Hills via Bethesda; and from Key Bridge to Purcellville, VA. Planned trails will connect the existing network to Silver Spring, Takoma Park, Brookland and Capitol Hill, as well as the Anacostia waterfront. Closure of Beach Drive also connects the two ends of the Capital Crescent/Georgetown Branch Trail, forming a 21-mile loop that is virtually car-free, expanding the possibilities for recreational visits to the Park.

The Park Service plan to establish a Visitor Center on Beach Drive, at the current Park Police station, will help draw many pedestrians, school groups, and tourists to the heart of the Park for the first time, and will improve the experience of current users. This refocusing of the Park's resources will make Beach Drive more like a park, and less like a road – a vast improvement in the eyes of PARC's recreational and environmental supporters. **If the sections of Beach Drive affected by Alternative D were left open to auto traffic at all times on weekdays, the investment in a Visitor Center would be largely wasted.** The Park's visitors on weekdays would continue to be auto commuters, unlikely to stop.

Besides closing the three sections of Beach Drive for six hours a day, it is also **important that the Park Service undertake the traffic calming and enforcement measures that it proposes** as part of Alternative D (page 100), which the draft plan says "would hold traffic speeds to the posted limit." According to the traffic study performed during the planning process by Robert Peccia and Associates (page 4-16), 99% of the cars on Beach Drive exceeded the speed limit west of West Beach Drive, and 100% of cars exceeded the speed limit on Beach Drive south of the police substation. Depending on the time of day, as many as 63% of the cars exceeded 35 miles per hour, i.e., at least 10 mph over the limit. These speeds are a key factor in making this road unsafe and discouraging its use by bicyclists, despite the fact that the road is designated a bicycle route. Experienced cyclists can easily travel 15-20 miles per hour. Therefore, holding traffic speeds to the posted limit would go a long way toward improving safety when the road is open to cars. We particularly support the use of speed cameras for continuous enforcement, and traffic calming such as speed humps. Both measures, as proposed in the draft plan (page 100), would control speeds at low cost without the need for police presence.

**2. Other Issues Raised by the General Management Plan.** The General Management Plan performs an important service by focusing on traffic issues, but unfortunately, the focus on traffic has kept most observers from discussing other issues facing the Park and its users. If the GMP is to guide management of the Park for the next 20 years, it needs to address these issues as well. This section discusses six such issues: a) improvements to the existing paved trail; b) pedestrian access from the east side of the park; c) evening and nighttime hours; d) improving management of the Park's living resources; e) safety improvements at Wise Road; and f) the relocation of administrative and police facilities.

**a. Improvements to the Existing Paved Trail.** PARC supports NPS's intention to upgrade 5.3 miles of the paved trail that parallels Rock Creek. The trail has suffered neglect in recent years and has fallen into disrepair. Some trail sections flood regularly and become

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silt-covered because of poor drainage. Several sections are badly in need of re-paving and should be widened where possible. In other places the trail is so steep and has such poor sight lines that it is hazardous, particularly to inexperienced users.

Of particular concern to many trail users is the crossing of the Rock Creek Parkway entrance ramp on Shoreham Hill, just south of the Connecticut Avenue bridge. This is perhaps the most hazardous location in Rock Creek Park for bicyclists and pedestrians: they must cross fast-moving motorists who rarely stop for the trail's crosswalk, which is placed at the bottom of a steep hill. PARC welcomes NPS's intention to "redesign and rehabilitate for safety" the intersection of Beach Drive with the Parkway. PARC's preferred solution for the trail crossing is an underpass beneath the Parkway. A stop sign or a stoplight that could be activated by trail users may be an acceptable alternative, but a crosswalk alone is unacceptable to PARC.

NPS's proposal to arrange for 24-hour access through the National Zoo would also be welcomed by trail users, who are currently forced to travel through the tunnel after zoo closing hours. In addition to these proposed trail improvements, PARC urges NPS to restore the trail's water fountains.

**b. Pedestrian Access from the East Side of the Park.** PARC encourages the Park Service to include measures that enhance pedestrian access to the Park from the east side, particularly around Carter Barron. One such approach would be to reserve Morrow Drive for pedestrian access except during events at the tennis stadium or Carter Barron Amphitheater. Alternatively, NPS could construct a paved trail along an existing roadway such as Piney Branch Road.

**c. Evening and Nighttime Hours.** Alternative D as was inspired by a request from D.C. Mayor Anthony A. Williams that the Park Service explore the possibility of weekday recreation zones during the "non-rush-hour" period. Since the non-rush-hour period comprises about 18 hours per day, many recreationists and environmentalists were dismayed when NPS interpreted the Mayor's request to include only 6 midday hours.

Alternative D, as currently designed, needlessly forecloses evening recreational opportunities which could be very popular during the long days of late spring and early summer. Furthermore, leaving Beach Drive open to motor vehicles during hours of darkness provides no benefits in terms of commuting or scenic driving. But the cost of allowing nighttime traffic is likely very substantial in terms of damage to wildlife.

At the least, NPS should extend the weekend hours by keeping the gates closed on Friday and Sunday nights. That would expand recreational opportunities and give the wildlife a break for three nights per week instead of just one, at no additional administrative cost to the Park Service.

**d. Improving Management of the Park's Living Resources.** The draft General Management Plan does not discuss management of the Park's wildlife in great detail, but as one looks toward the next 20 years, the Park has major opportunities that it should seize to improve management of its living resources. Construction of a fish bypass at the Peirce Mill dam would expand habitat for blueback herring, American eel, and alewife, important

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species for the health of Chesapeake Bay. This project has been in planning for many years. It should be undertaken as soon as possible.

Deer in the Park are rapidly becoming a nuisance species, devastating ground vegetation that is important for migrating and nesting birds and small mammals. Some method of controlling deer populations needs to be considered.

The draft General Management Plan provides an informal count of 1,223 roadkill recorded in and adjacent to the Park over the decade 1991-2000, and concedes that actual road kill is probably higher. Between one-quarter and one-third of this roadkill occurs on Beach Drive, according to the plan (p. 132). Included in this total are numerous box turtles and black rat snakes (p. 134); both species appear to be declining in the Park. Closing Beach Drive to auto traffic would reduce roadkill and help protect these species.

*e. Safety Improvements at Wise Road.* Another concern that the GMP does not appear to address is the existing traffic hazard for weekend recreational users in between the two northernmost Beach Drive recreation zones. For a few hundred yards, recreational users must share the roadway with motor vehicle traffic crossing the Park on Wise Road. On weekends, this short section of Beach Drive is often covered with both cars and recreational users -- including families with small children -- sharing this hazardous roadway with no separation. Because this section of Beach Drive includes turn lanes, it is wide enough to provide for a dedicated bike/pedestrian lane on the west side of the road, if properly reconstructed.

*f. Relocation of Administrative and Police Facilities.* We applaud the Park Service for its plan to expand visitor services on Beach Drive and to move administrative offices out of Klinge Mansion. But the plan is vague regarding where the Park Police substation and the Park administrative offices are to be relocated. The Park Service should commit in the final document to build no new facilities in the Park for these purposes that would cause removal of mature trees, increase impervious surfaces, or otherwise degrade the Park's natural features.

**3. Issues Raised by Opponents of Alternative D.** As noted earlier, we believe that better protection of the Park's resources and expanded recreational access (as proposed in Alternative D) are supported by the vast majority of Park users who actually get out of their cars. But many people don't get out of their cars. For them, potential impacts on traffic are the main issue. To many of these people, Alternative D would close "a major north-south artery," causing intolerable amounts of spillover traffic on surrounding streets, and eliminating shortcuts to various destinations.

In fact, as the Park Service understands, the northern section of Beach Drive is not a major artery: it's a narrow, winding, two-lane road, with 9 blind curves in one 1.5 mile stretch and a speed limit of 25 miles per hour. Four major parallel routes for autos (16<sup>th</sup> Street, Georgia Avenue, Connecticut Avenue, and Wisconsin Avenue) as well as several minor routes (Oregon Avenue, Ross Drive, Glover Road, and Broad Branch to name a few) also serve as alternatives, and Metro's red line parallels the Park on both the east and west. **It is hard to imagine a situation in which more alternatives to driving on a given road**

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**exist. The few people traveling on Beach Drive during the mid-day period can be diverted to these alternatives, avoiding local neighborhood streets entirely.**

In addition, as the draft plan notes, every east-west route across the Park would remain open to cars under the proposal, so the use of the Park as a shortcut to other destinations would largely continue. Road signs and traffic calming can help if problems emerge, but based on traffic studies and experience elsewhere, problems appear unlikely.

Of course, one segment of those driving on Beach Drive -- perhaps a major segment -- doesn't want an alternative. For them, driving on Beach Drive is the objective, just as recreating on Beach Drive is the objective for many of PARC's supporters. It is here that **Alternative D commends itself over the other alternatives. It adds recreational access to the road, without eliminating access for motorists. As proposed, motorists would still have 18 hours a day to drive on the affected sections of the road.**

We would argue that this is more than enough. In fact, we supported Mayor Anthony Williams' proposal that the Park Service close the three segments during *all non-rush hour periods* on a trial basis, meaning that motorists would have weekday access 5 or 6 hours a day, with the road being closed to motor vehicles at all other times. We continue to believe that such an approach would provide superior environmental protection and additional recreational access without causing traffic problems. Our support for Alternative D reflects our judgment that it comes closest to this earlier position, but **we hope that the Park Service will be able to test additional modifications such as the Mayor's proposal without the need to undertake a full-blown General Management Plan again.**

Other issues raised by opponents of Alternative D include emergency access -- including the road's potential use as an evacuation route -- and access by seniors and the disabled. We think these issues are without merit. Beach Drive was not designated an evacuation route in the city's recently completed emergency plan. In any event, the temporary barriers closing the road could be circumvented or removed in seconds, should the need arise.

Similarly, **closing portions of Beach Drive would not restrict the access of senior citizens and the disabled to the Park. It would improve it.** When closed to auto traffic, this road is ideal for seniors or the mobility impaired -- a flat, smooth surface immediately next to Rock Creek. With no hills to climb, no curbs to overcome, and no traffic to worry about, seniors and the disabled would have a chance to experience the woods, hear the sounds of the birds and the rushing creek, and see trees budding or fall colors at their leisure. The alternative offered by opponents is a 3-minute drive through the gorge at 25 miles per hour (or more likely, at 35-40 mph).

The arguments raised by opponents have convinced many neighborhood groups and the D.C. and Montgomery County Councils to approve resolutions opposing any alternative other than the current management of the road. This should not come as a surprise. As Ernie Brooks, Chair of the Coalition for the Capital Crescent Trail, noted at one of the NPS public hearings, neighborhood associations typically oppose change. When the Capital Crescent Trail was being planned, not a single neighborhood group supported it. Some even opposed access from their neighborhoods to the trail after it was completed -- in one case a condo association went so far as to build a fence with barbed wire between their property and the

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trail, although they later added a gate and ramp when it became apparent that the trail was actually popular with their members.

Unlike the National Park Service, many of these groups have allowed no public input before taking a position. By contrast, we commend you for conducting an open process in which arguments for and against your proposal were given a full hearing. **We urge you to weigh the merit and factual basis of the comments you receive as you conclude your analysis and choose an alternative for implementation.**

**4. Technical Issues. The analysis of traffic impacts, as shown on pp. 263-264 of the draft GMP, appears to us to have exaggerated the impacts of Alternative D (and, most likely, the other alternatives) in 2020.** Given the weight placed on traffic impacts in this debate, it is important that this element of your analysis be correct.

The primary problem appears to be calculations of traffic diverted from Beach Drive along the segment from Joyce Road to Broad Branch Road. Table 28 predicts that under Alternative D, a maximum of 970 vehicles per hour would be diverted in the midday period relative to Alternative B in 2020. Based on Table 29, these vehicles would presumably be diverted to Connecticut Ave., Wisconsin Ave., 16<sup>th</sup> Street, Georgia Ave., and Broad Branch Road. (The other routes listed in Table 29 all feed into one of these, so adding their totals would presumably double count diverted traffic.) Summing the vehicles on these diverted routes for Table 29 totals 1,840 vehicles per hour, much more than the 970 vehicles per hour available to be diverted. Table 29 also fails to allocate any of the diverted traffic to Ross Drive and Glover Road, further exaggerating the potential impacts on streets outside the Park.

The predicted traffic diverted to Broad Branch Road and Blagden Avenue are potentially the biggest traffic impacts associated with Alternative D. The draft GMP concludes (following Table 29 on p. 264) that "traffic volumes would more than double" on these two roads. Here, too, the number diverted exceeds the amount available to be diverted. Since both of these roads are described as being very sensitive to small changes in traffic, this seems to be an important inconsistency.

Several other elements of the analysis appear to be flawed:

- a) Beach Drive, from Joyce Road to Broad Branch Road, is expected to have 970 vehicles per hour at the midday peak. This is larger than the projected AM rush hour peak of 800 cars shown in Table G.2.
- b) Beach Drive, from Blagden Avenue to Rock Creek Parkway is projected to have 3000 vehicles per hour at the midday peak. This is larger than projections of both the AM and PM rush hour peaks shown in Table G.2.
- c) In all cases, the analysis projects 8.3% of Average Daily Traffic for the midday peak; 5% would be more typical, according to PARC's transportation consultants at ICF Consulting. Use of 8.3% leads to projected volumes during midday periods that are above the AM rush hour peak and close to or above the PM rush hour peak in all cases along Beach

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Drive. (ICF's critique of the GMP's traffic analysis was provided to Patrick Gregerson of NPS by e-mail on May 23, 2003.)

- d) The projected midday peak in traffic on Beach Drive occurs between 10:00 AM and 11:00 AM, according to the draft GMP (page 263). This assumption is in striking contrast to the actual traffic counts reported by Robert Peccia and Associates in their traffic study for the Park Service. In discussing hourly traffic variation, the Peccia study concluded that traffic counts between 10:00 AM and 11:00 AM were lower than those for any hour between 7:00 AM and 8:00 PM (Peccia, page 4-6).

PARC believes that **some of the public opposition to Alternative D may be attributed to overstated traffic impacts in the draft GMP.** We urge the Park Service to carefully examine its traffic analysis and revise its conclusions where appropriate.

**5. Testing Alternatives and Providing Flexibility. Given the uncertainties in the traffic modeling and the concerns expressed by opponents of any change in traffic patterns, PARC (and D.C. Mayor Anthony Williams) had earlier suggested that the Park Service test weekday non-rush hour closure of Beach Drive before implementing it on a permanent basis. This would allow actual measurement of before and after traffic impacts, and would allow the analysis of additional variations if negative impacts on surrounding neighborhoods were found to occur.**

The draft plan notes on page 95 that "the actual closure configuration [of Alternative D] may be adjusted." Given the length of time that the General Management Planning process has taken and the contentiousness that the process seems to have generated, PARC supports the need for operational flexibility in implementing Alternative D.

In particular, as part of any adjustments to be considered for future implementation, we believe that additional time periods should be considered for closure of the affected segments, beginning with an expansion of the weekend closures to encompass 7:00 PM Friday to 7:00 AM Monday, and ultimately encompassing, as Mayor Williams' letter suggested, all non-rush hour periods.

The key point is flexibility. It should not require 7 years of analysis and countless hours of input from interested parties to make adjustments to the closure configuration.

**Conclusion.** In general, PARC commends the Park Service for its efforts to restore balance in Rock Creek Park, to lessen the impact of auto traffic, to improve recreational opportunities, to protect the Park's historic resources, to expand interpretation and educational opportunities, and to improve the safety of Park visitors. We will continue to support such efforts as the National Park Service implements the proposals outlined in the draft plan.

Alternative D is a modest proposal. The fears raised by opponents (of traffic spillover, of emergency access, of difficult access for seniors and the handicapped) are unfounded. Many of these arguments were made against weekend recreation zones in 1980. **Parks in many other cities, including, New York, Brooklyn, Atlanta, Baltimore, and Los Angeles have closed park roads to traffic on weekdays with great success.** There is every reason to

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believe that weekday closure of Beach Drive, as envisioned by Alternative D, would also be successful.

PARC urges the National Park Service to stand behind its vision of what Rock Creek Park can be, and not to give in to the emotional arguments of opponents. Had NPS bowed to these arguments in 1980, we would have foreclosed the recreational mecca that Beach Drive represents today.

### **PEOPLE'S ALLIANCE FOR ROCK CREEK (PARC)**

African American Environmentalist Association  
 American Discovery Trail  
 American Hiking Society  
 Anacostia Watershed Society  
 Audubon Naturalist Society  
 Coalition for the Capital Crescent Trail  
 Center for Environment, Commerce, and Energy  
 College Park Area Bicycle Coalition  
 DC Bicycle Courier Association  
 DC Clean Air Network  
 DC Statehood Green Party  
 DC Velo Club  
 Friends of Meridian Hill  
 Friends of the Earth  
 Friends of the Northwest Branch  
 Friends of the W&OD  
 International In-line Skating Association  
 Montgomery County Outdoor Education Association  
 Metroped, Inc.  
 Montgomery County Road Runners Club  
 Potomac Pedalers Touring Club  
 Rails to Trails Conservancy  
 Reed-Cooke Neighborhood Association  
 Reston Bike Club  
 Sierra Club of Montgomery County  
 Sustainable Montgomery  
 The Potomac Conservancy  
 Trash Force  
 Virginia Bicycling Federation  
 Washington Area Bicyclist Association  
 Washington Area Rollerskaters  
 Washington Parks and People  
 Washington Regional Network for Liveable Communities

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Dear Superintendent Coleman,

I bicycle commute through Rock Creek Park. Frequently I am passed too close by motorists who are obviously exceeding the speed limit. I do not mind sharing the road with motorists who obey the law, but the current situation is dangerous. I am only mildly threatened by offenders who are speeding or passing too close, but this constant onslaught of many multiple violators is inexcusable. As a public safety measure you should immediately close the gates until you have implemented effective law enforcement technologies. Your preferred alternative does not go far enough considering the hazard to public safety.

Tim Bouquet  
Potomac Peddlers Touring Club  
DC Ride Coordinator

MR. YOURISH: Hi. Thank you for the opportunity to speak tonight. My name is Brian Yourish, Y-O-U-R-I-S-H. And I live in D.C. I am testifying tonight on behalf of Rails-to-Trails Conservancy, a national nonprofit organizations that advocates for the conversion of rail corridors into multi-use trails. The Capital Crescent Trail which runs from Georgetown to Montgomery County, Maryland is an example of that sort of facility.

Rails-to-Trails Conservancy supports the National Park Service's proposal to create weekday recreation zones along upper Beach Drive. This road is one of the greatest recreational resources in the District used by thousands of people on weekends. Expanding this opportunity to weekdays would enhance quality of life for people all over the Washington area.

Weekday recreation zones on Beach Drive would attract many kinds of people; seniors, students, families with small children, flex time workers, tourists and school groups could all take advantage of this spectacular recreational resource from 9:30 to 3:30 p.m. on weekends.

In addition, the Rock Creek Valley could become a living laboratory for local schools on weekdays facilitated by the improved pedestrian access from Beach Drive. In fact, the Park Service plans to enhance its educational program to take advantage of Rock Creek as a venue for school trips.

In the narrow gorge north of Broad Branch Road the Park Service has determined that there is no room for a trail. My experiences as a long distance runner has also shown me that the 5 miles or so between where the trail currently ends at Broad Branch Road and the Maryland border, there is no room for a trail. The creek is often directly next to the road and it is obvious from my experience that the terrain is very require the removal of a large quantity of the forest land to construct a trail through that area.

Due to that, the closing of this section of upper Beach Drive would help this area become part of the whole trail network of the area connecting to the Rock Creek bike path in Montgomery County, Maryland, which also connected with the Capital Crescent trail. Trail users heading south could use Beach Drive to connect with the paved bike path that exists just north of the zoo and go all the way down to the Mall.

It is the sentiment of Rails-to-Trails Conservancy of the shared use of scarce public resources is the appropriate public policy for the Park Service to pursue through its management plan.

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(b) (5) - DPP

April 1, 2003

Douglas M. Duncan  
County Executive  
101 Monroe Street  
Rockville, Maryland 20850-2540

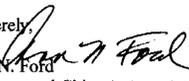
Re: Draft General Management Plan for Rock Creek Park proposing closures of Beach Drive affecting Montgomery County roads.

Dear Mr. Douglas,

The National Park Service has drafted a General Management Plan <http://www.nps.gov/rocr/> addressing various proposals to change the current management of Beach Drive. Any change that promotes closures of portions of Beach Drive will affect traffic patterns in our Montgomery County neighborhood. (Please see attached letter from Superintendent Coleman). Mr. Genetti, Director of the Department of Public Work and Transportation received a letter from Mr. Cochran, Director of Parks 6/21/01, see attached, concerning this matter. Mr. Genetti sent a letter to Rollingwood Citizen's Association, see attached, stating he was contacting the Director and was going to see what the proposed closures would be. I am following up since the hearings are now scheduled for May and written comments are due in July. What has the County done as far as determining the implications of these closures, Beach Drive, to community roads in Montgomery County? The Rollingwood Citizens Association is against any closures/HOV restrictions to Beach Drive, all the traffic coming off of Beach Drive will be forced in to our neighborhood roads, Pinehurst Parkway, Wyndale, Daniel, Leland, Woodbine. This problem already occurs on weekends and we have not received any help in dealing with these traffic issues from any jurisdiction (see attached letters). We already have restrictions during rush hour to prohibit cut through traffic. Any further closures of Beach Drive will increase cut through traffic and make our roads unsafe. We do not have sidewalks and our children use the roads to walk to the park and their school buses. We do not want to make walking in our neighborhood unsafe for our children. Additionally, Beach Drive is a community road for our neighborhood. We travel this road to go to work, church, grocery shopping and other daily activities. We would now have to take longer trips in addition to all the other cars that will have prolonged commutes due to restrictive use of Beach Drive, has an environmental impact study been done to determine the pollution due to additional time on the roads? What about security? How will the evacuation of the city be enhanced by closure of Beach Drive?

Please address the concerns of our community. It has been very difficult dealing with multiple jurisdictions and coordinating what jurisdiction is responsible to deal with this problem. The Rollingwood Citizen's Association is looking forward to a resolution to this situation.

Sincerely,

  
Ann N. Ford  
Rollingwood Citizen's Association

cc: Albert Genetti  
Donald Parks  
Adrienne Coleman  
John Adams Hurson  
Howard Denis  
Chris Van Hollen, Jr.

Ann Ford  
2710 Daniel Road  
Chevy Chase, MD 20815-3151

National Park Service, Rock Creek Park Superintendent

I am representing Rollingwood Citizen's Association in Montgomery County, Maryland. Our community borders Beach Drive north of the District.

The Draft Management Plan for Rock Creek Park has been reviewed by the Association, which is against Alternatives A, C and D. Alternative B, to continue current management/no action, is supported by the Association.

There are four reasons for our objection to A, C and D.

First is safety. With any closure or restrictive use(HOV) of the northern sections of Beach Drive our community will experience a significant increase in traffic. For the many children of this community who walk to their schools, school buses, and park, this is a very dangerous situation. The ability to walk safely in our neighborhood during the day will be at risk.

The second objection is the ability of our community to carry out its daily living activities. Beach Drive is considered a neighborhood road to our community. At all hours of the day we travel to work, go grocery shopping, and do errands using Beach Drive. The ability to perform these tasks in our neighborhood will be unfairly inhibited by alternatives A, C and D.

The third objection is the impact on the environment. There would be additional commuting time for cars that would normally be taking Beach Drive, producing more pollution.

The fourth objection is that the general management plan does not address solutions to the fall out traffic problems of communities surrounding Rock Creek Park. The northern portions of Beach Drive are closed on the weekends to motorists, creating heavy traffic on residential roads. The Park service will not address this issue because these roads are not in the Park's jurisdiction. Again the National Park Service is making unreasonable policies that adversely affect the Park's surrounding communities, and is taking no responsibility for the consequences of these policies.

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Over the years, Beach Drive has become an essential road in commuting for the entire D.C. Metropolitan area. Prohibiting or restricting use will only create problems for the surrounding communities. With traffic constantly increasing in our area, closing down roads without supplying alternatives is not a justified solution.

Sincerely,  
Ann N. Ford  
Rollingwood Citizen's Association

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Page 1 of 2

MS. FORD: Hi, my name is Ann Ford. I'm representing Rolling Woods Citizens Association. I live in Chevy Chase, Maryland. The Rolling Woods Citizens Association represents the residents of 832 homes in Chevy Chase, Maryland bounded by Beach Drive, East-West Highway, Brookville Road, and Western Avenue. Our association strenuously opposes the proposal in the National Park Service draft management plan for Rock Creek Park to close portions of Beach Drive to vehicular traffic on weekdays from 9:30 a.m. to 3:30 p.m.

We respectfully request your support for the Association's position, and we hope we can count on your vigorous advocacy of your position with the National Park Service before the public comment period concludes on July 15. As a Rock Creek Park immediate neighbor, Rolling Wood residents have a special appreciation for the park as a wonderful resource and a neighborhood asset.

We also recognize the weekend closure of portions of the road provides recreational use for many. However, weekend closure combined with annual increase in D.C. traffic already impact Rolling Wood. Our neighborhood streets, particularly Daniel, Windale, Greenvale, Pinehurst Parkway, Woodbine, Leland, and Brookville Road, already experience cut through vehicles searching for alternative routes from Beach Drive when it is closed or crowded. Any additional closure to Beach Drive will result in significant, dangerous, and unacceptable increases in traffic through Rolling Wood.

None of our neighborhood streets have sidewalks. A significant traffic increase will further threaten pedestrian safety in our neighborhood. Additionally, more cars traveling, stopping, and starting throughout our neighborhood will add exhaust emissions adversely impacting our environment. Moreover, at the time of concern over evacuation routes to smoothly move thousands of people out of D.C., it seems inconsistent that a plan to close a significant evacuation route is receiving serious consideration.

Clearly the weekday Beach Drive closure will have only minimal recreation benefits. The plan provides for no study or solutions to the fall out traffic problems created for Rolling Wood and the surrounding communities. We assert that this closure would create major problems for our neighborhood.

The plan is therefore ill-conceived. It applies only minimal benefit in exchange for a major deterrent to our community.

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The current transportation management plan has worked successfully for many years. Balancing recreational and other community interests on behalf of the 830 homes in Rolling Woods Community, we strongly urge you to join us in opposing any change to the present weekend-only closure of portions of Beach Drive. We deeply appreciate your careful review of this matter and look forward to hearing from you soon. Thank you for your anticipated support.

I have more time. Additionally, I would like to address the specific deficiencies in the plan. The first deficiency is the plan lacks analysis of traffic impact on neighborhood roads. A proposition that the rerouted traffic does not impact neighborhood roads is without basis. The plan states that the NPS did not study neighborhood roads, page 346.

Another deficiency is assumes traffic will be rerouted to Connecticut Avenue. Due to the park closure on weekends, traffic is currently rerouted to neighborhood roads. Why would this change during the week? Another deficiency is uncertain benefit. Between the hours of 9:30 a.m. and 3:30 p.m., who will use this park? The study does not address levels of service during this time. During the winter months, the closed section of Beach Drive has a very low level of service. In the Montgomery County portion of the park, the bike paths experienced low utilization during the mid-day portion of the weekdays. A survey conducted by the NPS indicates 68 percent of the cyclist prefer bike paths over the road.

Another deficiency is plan acknowledges its model cannot accurately predict shifts in transportation modes. This shortcoming casts doubts on NPS' dubious assertion that road closure will result in a surge in cyclist commuting. Another deficiency is no cost benefit analysis undertaken by NPS. No cost benefit analysis was performed by the NPS of adverse impacts on neighborhoods surrounding the park which are an increased rate of pollution, increased gas use by diverted vehicles, need for the community to put traffic calming measures. Thank you.

**NEAL R. GROSS**

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WASHINGTON, D.C. 20005-3701



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Rollingwood Citizens Association  
Chevy Chase, MD 20815-3134  
www.rollingwood.cc

20 May, 2003

The Honorable Barbara A. Mikulski  
The Honorable Paul Sarbanes  
The Honorable Christopher Van Hollen  
The Honorable Douglas Duncan  
The Honorable Howard Denis

The Rollingwood Citizens Association (RCA) represents the residents of 832 homes in Chevy Chase, Maryland, bounded by Beach Drive, East-West Highway, Brookville Road and Western Avenue.

Our Association strenuously opposes the proposals in the National Park Service's Draft General Management Plan (the "Plan") for Rock Creek Park to close portions of Beach Drive to vehicular traffic on weekdays from 9:30 AM to 3:30 PM.

We respectfully request your support for the Association's position and hope we can count on your vigorous advocacy of our position with the National Park Service before the public comment period concludes on July 15<sup>th</sup>.

As Rock Creek Park's immediate neighbor, Rollingwood residents have a special appreciation for the Park as a wonderful resource and a neighborhood asset. We also recognize that weekend closure of a portion of the road provides recreational use for many.

However, weekend closure combined with annual increases in DC traffic already impact Rollingwood. Our neighborhood streets, particularly Daniel, Wyndale, Greenvale, Pinehurst Parkway, Woodbine, Leland and Brookville Road already experience "cut through" vehicles searching for alternate routes from Beach Drive when it is closed or crowded. Any additional closure to Beach Drive will result in significant, dangerous and unacceptable increases in traffic through Rollingwood.

None of our neighborhood streets have sidewalks. A significant traffic increase will further threaten pedestrian safety in our neighborhood. Additionally, more cars traveling, stopping and starting throughout our neighborhood will add exhaust emissions, adversely impacting our environment.

Moreover, at a time of concern over evacuation routes to smoothly move thousands of people out of DC, it seems incongruous that a plan to close this significant evacuation route is receiving serious consideration.

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Clearly, this weekday Beach Drive closure will have only minimal recreational benefits. The Plan provides for no study of or solutions to the fall-out traffic problems created for Rollingwood and the surrounding communities. We assert that this closure will create major problems for our neighborhood. The Plan is, therefore, ill-conceived: It provides only minimal benefit in exchange for major detriment to our community.

The current transportation management plan has worked successfully for many years, balancing recreational and other community interests. On behalf of the 832 homes in the Rollingwood community, we strongly urge you to join us in opposing any change to the present weekend-only closure of portions of Beach Drive.

We deeply appreciate your careful review of this matter and look forward to hearing from you soon. Thank you for your anticipated support.

Sincerely,

s/ Gabriele Gandal

Gabriele Gandal, President  
Rollingwood Citizens Association

CC: Superintendent  
Rock Creek Park Headquarters  
3545 Williamsburg Lane, NW  
Washington, D.C. 20008

## Concerns About Proposed Closure of Beach Drive FACT SHEET

### **Issue: *There has been no substantive analysis of the impact of traffic on neighborhood streets.***

- Plan states that NPS did not study neighbor streets.
- No basis for the assertion that rerouted traffic does not impact neighborhood streets. (*Plan document pg. 347*)

### **Issue: *Assumption that traffic will be rerouted to Connecticut Avenue.***

- Due to the Park closure on weekends, traffic is currently rerouted to neighborhood roads that feed into Connecticut Avenue.
- Connecticut Avenue is already overcrowded and overutilized, making it an unlikely and impractical alternative to Beach Drive.

### **Issue: *Inadequate study of benefits of closure.***

- There are no data in the plan to substantiate that there will be increased use of the park between the hours of 9:30am-3:30pm
- During the winter months the closed section of Beach Drive is under utilized.
- In the Montgomery County portion of the Park the bike and walking trails are used very little during the hours of 9:30-3:30 on weekdays, the proposed times for closure.e .

### **Issue: *Current alternatives offered by NPS are deficient.***

- Current alternatives pit traffic restrictions against recreational and educational benefits .
- There is a need for an alternative that preserves current "open corridors" for weekday traffic while providing for enhanced recreational and educational opportunities and modification to administrative and police offices and personnel.
- There are no alternatives that would involve enhanced recreational facilities such as bike and pedestrian trails, other than those that would close Beach Drive.

**Issue: NPS has not involved other impacted government entities in its planning.**

- The District of Columbia and Montgomery County Councils have passed formal resolutions emphasizing the importance of Beach drive and the Rock Creek and Potomac Parkway to the local and regional transportation system.
- The Councils and the Maryland Department of Transportation, the District of Columbia Department of Public Works have urged NPS that the corridors have no new motor vehicle restrictions because of the potential adverse effects on the heavily burdened regional street grid. This position is supported by all of the above.
- Several neighborhood organizations, and many individuals commented during scoping that they oppose the alternatives for similar reasons. (NPS p. 62)

**Issue: NPS failed to perform environmental impact studies on neighborhoods surrounding the park.**

- The NPS Plan contains numerous assertions that there are no major differences in the environmental impact among the 4 alternatives including Alternative B, maintaining the status quo.
- Surrounding neighborhoods will have increased emissions due to greater volumes of stop and go traffic

**Issue: No analysis has been done to assess accident and injury and fatality rates that may result from diverting traffic onto neighborhood streets.**

- Pedestrian/cyclist injury rates are known to be higher on neighborhood roads than on major arteries such as Beach Drive and Rock Creek Parkway, yet NPS failed to consider the potential human cost and risks resulting from shifting traffic neighborhood streets.
- More than 50% of all pedestrian fatalities occur on neighborhood streets. According to the Mean Streets study, there is a 45% fatality rate for pedestrians in pedestrian/automobile collisions at a vehicle speed of 30 mph
- In 1999, Montgomery County documented the fact that vehicle speeds averaged 30 mph on Daniel Road, exceeding the posted speed limit, thereby causing great risk to pedestrians.
- There has been low incidence of pedestrian/cyclist injury and fatality in the Park. For the three-year study period undertaken at the direction of NPS, the fatality rate for Beach Drive was 0.3% -- representing one fatality involving an automobile colliding with a stationary object.
- 10 of 17 pedestrian/cyclist accidents involving motor vehicles on Beach Drive and four roads in the northern section of the Park occurred on WEEKENDS on "closed-off " road segments, the very same segments that NPS proposes to close on weekdays. (p. 149)

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(b) (5) - DPP

5/29/03

Honorable Paul Sarbanes  
309 Hart Senate Office Building  
Washington, D.C. 20510

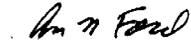
Re: General Management Plan for Rock Creek Park

Dear Honorable Paul Sarbanes,

I am writing in reference to Rollingwood Citizens Associations' concerns of a Draft Management Plan for Rock Creek Park. The National Park Service (NPS) has developed an ill-conceived and severely deficient proposal to close Beach Drive in Rock Creek Park to workday traffic. NPS has failed in its obligation to study the potential impact and presumed benefits of this proposed action, which, if implemented, would divert massive amounts of new traffic into communities surrounding the Park. Because of this failure to carefully and thoughtfully evaluate the impact of the NPS proposal, it should be rejected in its entirety. I have included documented evidence that the NPS did not do their job (see attachments). In addition contradictory information in the General Management Plan (see attachment pg 34) indicates the NPS looked at building a bike path in certain park areas but did not consider this because of low usage of the path during the week, but the NPS wants to close roads in the same areas to accommodate bikers during that same time period. This does not make sense.

We would appreciate your support in reviewing this matter and look forward to hearing from you. Thank you for your anticipated support.

Sincerely,



Ann N. Ford  
Rollingwood Citizens Association

atorc343@hotmail.com

**PROPOSED CLOSURE OF BEACH DRIVE: THE FACTS AND RECOMMENDATIONS**

*The National Park Service (NPS) has developed an ill-conceived and severely deficient proposal to close Beach Drive in Rock Creek Park to workday traffic. NPS has failed in its obligation to study the potential impact and presumed benefits of this proposed action, which, if implemented, would divert massive amounts of new traffic into the communities surrounding the Park. Because of this failure to carefully and thoughtfully evaluate the impact of the NPS proposal, it should be rejected in its entirety.*

**National Park Service Proposal – An Overview**

- The National Park Service has developed a management plan for Rock Creek Park, which includes four alternative proposals to enhance recreational facilities, improve visitor education, and relocate administrative facilities.
- All but one alternative in the NPS plan includes limiting traffic on Beach Drive.
- Closing Beach Drive is the cornerstone of "Alternative D" in the management plan. Of the four alternatives under consideration, Alternative D has been identified by the Park as its "preferred alternative." It involves closing three sections of Beach drive to traffic on Monday through Friday, from 9:30 a.m. to 3:30 p.m. These sections are currently closed to traffic on weekends and holidays.
- The Park believes that this alternative would enhance workday recreational opportunities while permitting access for rush hour traffic before 9:30 and after 3:30.
- The draft Environmental Impact Statement (EIS) determined that there would be insignificant environmental benefits associated with any of the alternatives studied, including maintaining the status quo.
- The public comment period on the Park's plan concludes July 15<sup>th</sup>, with a final decision to be published in the Federal Register several months later.

**Inadequate Traffic Studies and Failed NEPA Analysis**

- NPS has an absolute legal obligation under the National Environmental Policy Act (NEPA) to evaluate the impact of its proposal, yet numerous findings demonstrate that it has failed to meet these obligations required by NEPA.
- While an estimated approximately seven cars per minute use upper Beach Drive during the workday, the Park has failed to model cut-through traffic impacts on residential neighborhood roads. The draft EIS dismisses the potential for massive cut-through traffic in neighborhoods, but there are no data to substantiate this assertion.
- The draft EIS fails to evaluate weekday traffic volumes for Alternative D, the Park's "preferred alternative." (Page 337)
- The EIS uses traffic data collected in 1990 to assess traffic impacts, but this model is faulty as it is designed to evaluate regional traffic issues rather than impacts on corridors or neighborhoods. While the NPS attempted to make adjustments to improve its modeling, expert testimony presented at the May 22 hearing refuted the model's validity.

- Neighborhoods already experience significant cut-through traffic on weekends when Beach Drive is closed. Despite this actuality, the EIS makes the erroneous assumption that workday traffic will instead choose major corridors such as Connecticut Avenue and 16<sup>th</sup> Street. These corridors, already overburdened with traffic, will be poor alternatives for those seeking an efficient route downtown.
- According to AAA, rush hour is not limited to hours before 9:30 a.m. and after 3:30 p.m. Projections indicate that future rush hours will expand well into the 9:30-3:30 hours.
- The NPS has not performed a detailed analysis of the extent to which closing Beach Drive during these workday hours would enhance recreational opportunities and actual use of the park.

#### Safety Issues

- Residential streets are not designed to handle massive cut-through traffic, as they are often winding, without sidewalks, populated by many children, and used by school buses
- More than 50% of all pedestrian fatalities occur on neighborhood streets. Increasing traffic on these streets will result in a great risk of accidents involving both children and adults. In contrast, there has only been one documented accident in the park.
- In 1999, Montgomery County found that vehicle speeds on Daniel Road – a major cut-through – averaged 30 MPH. There is a 45% fatality rate at this speed.

#### Growing Political Opposition

- The NPS has failed to involve affected local governmental authorities. Officials and community organizations in every community surrounding the affected area have expressed deep concern and/or clear opposition to the road closure, including: DC Council members Schwartz and Fenty; Montgomery County Council; Maryland Department of Transportation; ANC 3F, 4A, 3C, Shepherd Park, Crestwood, Chevy Chase DC, Chevy Chase MD, Forest Hills, among others.

To: Gale Norton/SIO/OS/DOI@DOI  
cc: rocr\_superintendent@nps.gov

Subject: Draft Management Plan for Rock Creek Park

Dear Secretary Norton,

The National Park Service for Rock Creek Park has come up with a Draft Management Plan that is ill-conceived and a waste of our tax dollars. I want an investigation on the mismanagement of our tax dollars for this plan.

You state you are committed to 4 c's, cooperation, consultation, communication and conservation, has this been imparted to your employees? Our homeowner's association, Rollingwood Homeowner's Association has never been so mistreated by a government agency then by the NPS. We were never advised until the draft plan was completed that the preferred plan for Beach Drive was to close the road during the day. The Superintendent never contacted our homeowner's organization or other homeowner's associations to discuss the impact to our public safety. Do you know they violated NEPA by not performing a detailed statement when undertaking a major federal action that significantly impacts the quality of the human environment. The NPS did not perform one impact study on our neighborhood to determine if our public safety would be jeopardized by their plan. We feel this was done deliberately because they knew the results. I had the Maryland National Capital Park and Planning Commission perform the studies on our street and they found a significant cut through problem with the preferred alternative plan of the NPS. Why was this study not performed prior to the release of the NPS draft management plan? It is not like the Superintendent did not know of our concerns. I have written the Superintendent numerous times over the last 8 years to complain about the adverse impact from the weekend closure on our community without receiving any response other than it is not my jurisdiction or I will send extra patrols. We have yet to see these extra patrols.

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They are also violating the Rock Creek Enabling Act which established Rock Creek Park for these purposes, to be used for driving, for horseback riding and footways for pedestrians. NPS recognizes that driving by car in the Park is a traditional and fundamental purpose but its preferred alternative eliminates this use during the day. Also this road was legislated for the purpose of connecting the north and south parts of the Park with the Zoo. They want to do away with the Congressional intent of the Park.

Did you know the elderly, handicapped and mothers with small children can not use those areas of the park during the day because there is no access? This is the time of day when most of these individuals can use the Park.

The NPS was told in 1990 to put a bike path in and they declined based on a low user rate 20-35 user per hour. That rate has not significantly changed and in Montgomery County in that same area of Beach Drive there are about 24 users per hour and 250 cars per hour, but the NPS wants to close down a road for recreational use during the weekday when there is a 10 to 1 user rate. Do you know how I know this information? I had the studies done by the Maryland National Park and Planning Commission. The NPS did not even do the work they were supposed to do. The studies in the Draft Management Plan are over 13 years old, a traffic analyst who came to the hearings stated you can not use such old studies.

We have generated support against this closure from Chris Van Hollen, House of Representatives, DC City Council, numerous DC ANCs, numerous homeowner's association, Montgomery County Council will be deciding June 26,2003.

How did this happen? Why were the NEPA guidelines not followed? Why is the Rock Creek Park Enabling Act being ignored by the NPS? Thank you for taking the time to respond to my concerns. I look forward to hearing from you.

Sincerely,  
Ann N. Ford  
Traffic Committee, Rollingwood Citizen's Association  
Chevy Chase, Maryland 20815

MS. HOYTE: Good afternoon. My name is Joan Hoyte, Hoyte is spelled H-O-Y-T-E. I am the President of the Sheppard Park Citizens Association and my testimony today is on behalf of that Association.

The Sheppard Park Citizens Association joins ANC-4 and Ward 4 Council Member Fenti in opposing any and all changes in Rock Creek Park's management of the traffic plan. Instead, the Sheppard Park Citizens Association joins our ANC and Council Member Fenti in supporting alternative B for managing traffic through the parkway.

Rock Creek Parkway's Beach Drive is the western boundary of Sheppard Park. Residents of the Sheppard Park community rely on the accessibility of Beach Drive during their weekday commute to downtown and across town. In turn, an accessible Beach Drive helps to reduce the flow of traffic on the other northbound and eastbound roads that serve our community.

Speaking from my own family's experience on a daily basis we use the portion of Beach Drive that is targeted for closure twice daily to take our children across town. We traverse the park that way. Occasionally we also use other portions of Beach Drive to go downtown or across to Virginia.

If Beach Drive is closed, it will create a hardship for my family, as well as the other users from my community.

Mid-week closing of the portion of Beach Drive that is targeted would reduce the efficiency of our transportation system by forcing cars onto our already overburdened routes that run through Sheppard Park. For it is unlikely that if Beach Drive is closed, commuters who generally use that route will leave their cars at home and start using other means of transportation. Those who drive on Beach Drive to get to their downtown locations do so because it is a shorter route with less stop and go traffic. The closure of Beach Drive will necessarily leave them to use our already overburdened streets.

Apart from the crawling traffic that the closure of Beach Drive will create in our community, our neighborhood will suffer a resulting environmental pollution problem. On 16<sup>th</sup> Street, for example, rush hour traffic is a major source of pollution. Closing Beach Drive will add to that pollution overall in our neighborhood and throughout the city.

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ROCR 3113  
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As one of the most congested cities in this nation with an alarming air pollution problem, this city and this region cannot afford to close the valuable travel route of Beach Drive.

We do not believe that alternative D which permits vehicular traffic during rush hour, but closes Beach Drive from 9:30 a.m. to 3:30 p.m. will serve the commuting and recreational needs of our residents. A large percentage of the Sheppard Park citizenry are senior citizens and families with young children, many of whom use the park for recreational purposes not only on weekends, but also during the week. Alternative B would deny the use of the portion of Beach Drive which leads to the picnic areas in the park for those citizens who cannot get there but by their own car. If the objective for closing Beach Drive to automobile traffic is to make it safer for recreational users, the objective may not necessarily be achieved. Many Sheppard Park residents who have used Rock Creek Parkway for recreational purposes during the week and days, and on holidays when the park is closed have encountered bikers who behave recklessly, flying around curves—excuse me.

Breaking speeds, often frequently missing bikers and pedestrians.

**NEAL R. GROSS**  
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1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

MR. BROEHM: Good evening. My name is Jason Broehm. Last name is spelled B-R-O-E-H-M. I live in Washington, D.C. I'm here this evening as elected leader of the Sierra Club.

The Washington D.C. Chapter of Sierra Club supports alternative C, as you heard earlier, which would be complete closure to automobiles of the three segments of Beach Drive currently closed to motor vehicles on weekends.

Now, as you heard earlier, Sierra Club has a long and distinguished history as a leading defender of parks and natural areas. The organization has been instrumental in the creation and preservation of many national parks and other natural treasures across the country.

We recognize that alternative D, which would close Beach Drive during midday non rush hour periods during the week would be progress over the status quo with Beach Drive being opened to cars all day five days a week. However, we would be remiss if we failed to point out the deficiencies of alternative D.

Rock Creek Park was created in 1890 to preserve park resources "in their natural condition as nearly as possible." In recent years as we know, though, Beach Drive has become little more than a commuter highway with car after car speeding through the park. Five days each week the park is inundated with cars and clogged with traffic, particularly during rush hour. Only once have I ridden a bicycle on Beach Drive during rush hour, and I'm not sure whether it was out of curiosity, braver or stupidity, but I haven't ventured back there since during rush hour. It's a hostile environment. It's an unsafe environment. You have a narrow road with a steady stream of cars speeding through—actually intermediately speeding and stopped and backed up for a considerable distance at the many stop signs along the way.

By failing to address the rush hour traffic alternative D would leave a large part of the park's traffic problems unaddressed, thereby excluding recreational users when they would be most likely to use Beach Drive, either before or after work which coincide with rush hour, unfortunately.

On Tuesday and again tonight I've listened to a number of people who oppose alternative D, which is really a compromise position to begin with. I heard these people argue against any changes whatsoever in the management of Beach Drive, essentially alternative B. They oppose even reasonable changes and quite minimal ones at that, I might add. Such as implementing traffic calming measures, enforcing speed limits and instituting high occupancy vehicle requirements of two or more people during rush hour. I even heard some people on Tuesday express regret that Beach Drive is closed on weekends when far fewer cars are the road. This is really disturbing. It's troubling.

Why not at least support alternative A if you have some objections to closure that would at least control some of the traffic problems. Sadly I think this reflects the suburban mentality that is ruining the quality of life in the Washington, D.C. region. Seventy percent of D.C. commuters drive to work alone, that's one person per car. This is the single largest contributor to D.C.'s horrendous air quality problems.

We're in severe nonattainment category for ozone air pollution. Each summer we face too many code red days and last summer we even discovered that there's a worse air quality category which is code purple.

We need to shift our thinking towards alternatives towards transit, carpooling, biking.

As we have many times before, Sierra Club must take a principled stand for the protection of Rock Creek Park as with other parks. It really is a valuable national park and valuable recreational resource and we should be able to enjoy the park for recreation 24 hours a day, 7 days a week. We ask that you go further than alternative D. Please if it's C.

**NEAL R. GROSS**

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1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

MR. DOUGHERTY: Good evening. My name is Jim Dougherty. I live in Southwest Washington in Ward Six. I'm too far away to have a personal interest in this matter. I speak tonight on behalf of the 3,000 District residents who are dues paying members of the Sierra Club.

The Sierra Club is opposed to the proposed Alternative D on the grounds that it doesn't go far enough. We think the Park Service is pulling its punches here. We would like to see stronger steps taken to protect the wildlife, the ecosystem, and those park users who go there to enjoy the park as opposed to using it for driving to work.

First, I would like to make a background comment. The Sierra Club has been in the business of advocating conservation of the park system for a long time, longer in fact than you folks have. It was our president John Muir who took President Roosevelt into Yosemite in the 19<sup>th</sup> Century, a meeting which led to the creation of that park, a couple of decades before the Park Service itself was founded.

Over the centuries and in parks throughout the country, we have supported the Park Service's difficult effort to try and balance the competing demands that are placed on the park system. Those demands are protecting the resource, protecting recreationalists, and to some extent accommodating transportation needs. What we see is that with increasing urbanization, increasing population, increasing SUVs, increasing demand for driving through our parks, what the Park Service has done in response is to restrict automotive use.

In Yosemite Valley, for example, they are now executing a plan to keep the cars out. Naturally that's engendering some opposition, but the Park Service has come to the conclusion that's the right thing for the resource and the people. We think the same approach is appropriate here in Rock Creek Park. Rock Creek Park faces all of the threats of the other parks plus a lot more. They have encroachments. They have more people. They have more pollution.

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The time has come to take a step forward to protect the recreationalists. When it was proposed 20 years ago to close a few segments of Beach Drive on weekends, you saw the same kind of outrageous reaction that you are seeing now. People said oh my God, how can you do this, it's going to paralyze traffic in the city. What we learned of course was that was not the case.

In fact, what happened was for the first time people could get in there and really have a personal experience with the creek and with Boulder Bridge and with that great gorge and valley. So now you have had a couple of generations of Washingtonians who have really developed relations with the park. Now you have a lot more constituency support for the park and for its conservation.

We think you need to take it another step. We supported the proposal several years ago to extend the weekend plan to a weekday basis, in other words 24-7 you would close those few segments of Beach Drive. To our disappointment, Mayor Williams wrote a letter to the Park Service a couple of years ago saying why don't we leave the Beach Drive open for six hours a day for commuter traffic and close it for 18 hours a day. We saw that as a step back that we did not support.

We now see that in Alternative D the Park Service has proposed that the road be closed merely for six hours per day during the week. So it's a compromise on a compromise. And in fact it's now been proposed as a test. We can't oppose a test because a test is merely collecting information. I don't see how any reasonable person or group could oppose a test. But we think where this should be headed is extend the weekend closures that have been so successful on weekends. Thank you.

**NEAL R. GROSS**

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WASHINGTON, D.C. 20005-3701

MR. WENZLER. I am Mark Menzler. It's W-E-N-Z-L-E-R. I live D.C. I'm also Chair of the Washington D.C. Chapter of the Sierra Club. I'm here testifying on our behalf this evening.

Sierra Club is the nation's and the city's largest and most active grassroots environmental organization. We have over 3200 members in the city and over 17,000 members in the region.

Since it's founding in 1892 a fundamental mission of the Sierra Club has been to explore, enjoy and protect the wild places of the earth.

National parks have been the heart and soul of our nation since the world's first national park, Yellowstone, was created by an act of Congress in 1872 "for the benefit and enjoyment of the people in order to protect for all time this outstanding natural area." But it wasn't long after the establishment of a national park system that parks began to be threatened.

The Sierra Club's very first conservation campaign in 1892 sought to defeat a proposed reduction in the boundaries of California's Yosemite National Park. More recently, hundreds of thousands of Americans have spoken out against policies that threaten our national parks, forests and wilderness areas. For instance, people opposed proposals to drill for oil in the Arctic National Wildlife Refuge in Alaska, to reverse wilderness designations in the west and to log our old forests. But large western lands aren't the only ones threatened by ill-conceived policies. It seems that sometimes we overlook problems in our own backyard.

Rock Creek Park is the national park in our back yard. And for far too long we've ignored its unfortunate transformation from a wild and peaceful oasis to a major commuter thoroughfare.

In 1916 Congress established that the fundamental purpose of the parks is to conserve the scenery and the natural and historic objects and the wildlife therein, and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.

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That fundamental purpose has been seriously compromised by the massive weekend flow of commuter traffic through the park. The unbroken chain of autos during morning and evening rush hours impairs air quality, disturbs wildlife habitat, reduces the peaceful enjoyment of nearby hiking trails and severely restricts recreational opportunities on the roadways.

The Park Service says that Rock Creek Park offers visitors an opportunity to reflect and sooth their spirits through the beauty of nature. While this largely true on weekend days when upper Beach Drive is closed to autos, it is not true on weekdays when the park is overrun by cars.

The general management plan now being considered by the Park Service offers the best opportunity in our generation to begin to reverse the tragic degradation of Rock Creek Park by auto traffic. The one year test closure of upper Beach Drive to auto traffic during non rush hour proposed by the Park Service is a promising start.

However, the Sierra Club urges the Park Service to consider an all day closure, alternative C. Area residents who work typical 9:00 to 5:00 jobs will not be able to enjoy the car free time in the late morning and mid-afternoon under alternative D.

In addition, the Park Service will not be able to test whether the permanent closure of upper Beach Drive will cause commuter problems outside the park.

While it's certainly possible that closing upper Beach Drive to commuter traffic could increase congestion on some area roads, natural parks were not created to solve traffic problems. That's the job of area transportation planners. Rock Creek Park will never achieve the fundamental purpose of a national park unless and until it ceases to be a commuter highway.

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July 14, 2003

Adrienne Coleman, Superintendent  
Rock Creek National Park  
National Park Service  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008-1207

RE: Comments on the *Rock Creek Park and the Rock Creek and Potomac Parkway Draft General Management Plan and Environmental Impact Statement*

Dear Superintendent Coleman:

On behalf of our more than 3,200 members in Washington, D.C., the Sierra Club Washington, D.C., Chapter submits the following comments in support of Alternative C, "Non-motorized Recreation Emphasis."

The Sierra Club has a long and distinguished history of fighting to create and protect our national parks and other precious natural areas for future generations to explore and enjoy. As Washingtonians, we are blessed to have Rock Creek National Park in our own backyard. As one of the oldest and largest forested urban parks in the country it is truly unique.

As you are well aware, Rock Creek National Park faces a number of unique challenges. It is hemmed in on all sides by urban development, and surrounding land uses can significantly affect the health of Rock Creek's entire ecosystem. About 70 percent of the Rock Creek watershed has been developed with impervious surfaces, which speeds polluted storm water runoff into the creek, causes flooding and stream bank erosion and harms aquatic life. In addition, Washington, D.C.'s antiquated combined sewer system dumps raw sewage directly into Rock Creek any time the city receives more than a modest rain, making portions of Rock Creek unsafe for aquatic life and human use. And in recent decades—in the absence of any conscious policy or management decision—the park has been transformed from a tranquil escape from the surrounding cityscape to a busy commuter thoroughfare.



All of us who care about and love Rock Creek National Park as the place we all love, we have a tremendous amount of work ahead of us. The National Park Service's draft general management plan moves us in the right direction in the area of traffic management, but we can and should do better.

#### ***Close Portions of Beach Drive to Automobiles***

We are pleased that the National Park Service considers Alternative B, the status quo, to be unsatisfactory. (draft general management plan, p. 63). By selecting Alternative D as its preferred alternative, the National Park Service has taken an important first step toward controlling automobile traffic in the park. However, this alternative leaves the significant problem of weekday commuter traffic during the morning and evening rush hours almost completely unaddressed. Instead, we encourage the National Park Service to select Alternative C, the only alternative that would adequately address the growing problem of automobile traffic in Rock Creek National Park. This position is based in large part on the belief that the original purpose and mission of the park should be upheld even in the context of historical change.

In 1890, when Congress established Rock Creek National Park as a pleasure ground for the American people it directed park managers to "provide for the preservation from injury or spoliation of all timber, animals, or curiosities within said park, and their retention in their natural condition, as nearly as possible." At the same time it directed park managers to "lay out and prepare roadways and bridle paths, to be used for driving and for horseback riding, respectively, and footways for pedestrians[.]" At that time, and for some years afterwards, the horse-drawn carriage was the main mode of transportation on the area's dirt roads. A number of years would pass before the gasoline-powered automobile became widely available and eventually replaced horse-powered transportation.

In the park's early days, more of the park was surrounded by farmland than by city development. But as Washington, D.C., expanded and cars became more prevalent, the character of Rock Creek National Park also began to change. By the time the park received its first comprehensive plan in 1918, landscape architect Frederick Law Olmstead, Jr., "warned against bringing the 'noise and tangle' of city traffic into the heart of the park." (*id.* at p. 4). While the plan laid out a vision for the park's management, many of its recommendations were not implemented. By the 1930s, Rock Creek Park began to be used as a commuter route although Beach Drive remained primarily "an internal park touring road to provide recreational access to the valley." (*id.* at pp. 29, 139). However, in 1966 the opening of the National Zoo tunnel linked Beach Drive with the Rock Creek and Potomac Parkway, creating a continuous route through the park from Maryland to downtown Washington, converting this route for the first time a Rock Creek roadway into a preferred commuting corridor. (*id.* at p. 29).

Over the years, traffic on Beach Drive has steadily increased. Currently, parts of Beach Drive support an average of 9,000 vehicles per day while the parkway sees an average of as many as 55,000 vehicles per day on the busiest parts. (*id.* at p. 29). Commuter traffic accounts for the majority of these totals. According to the draft general management plan, "[c]ommuting has the greatest effect on traffic flows through Rock Creek Park." (*id.* at p. 147). It also states that "[d]uring weekday rush-hours, more than 99 percent of all vehicles using the Rock Creek

and Potomac Parkway and more than 95 percent of vehicles entering Rock Creek Park pass through without stopping." (*id.* at p. 148). Furthermore, the draft plan finds that "[m]ost vehicles travel at or above the posted speed limit through the park. Spot checks revealed that *the average speed was 15 miles per hour over the posted speed limit. Commuters in Rock Creek Park also tend to have more aggressive driving habits than do visitors unfamiliar with the park.*" (*id.* at p. 149, emphasis added). Based on these statistics, it is obvious that the vast majority of commuters are using the park not for recreation—the intended purpose of Rock Creek National Park—but as a commuter highway.

If current trends continue, the problem of commuter traffic on Beach Drive will only get worse. Without deliberate policy and management efforts, traffic models predict that by 2020 automobile traffic will double on portions of Beach Drive. (*id.* at p. 29). In fact, the draft plan concludes that under Alternative B (the status quo) "commuter traffic along some portions of Beach Drive would routinely include near-gridlock conditions, with average travel speeds only a third of free-flow speeds, vehicular backups, and long delays. This situation in Rock Creek Park would increase risks to visitors and disrupt their appreciation of the park." (*id.* at p. 62). Fortunately, the draft plan recognizes that such an increase in commuter traffic would "further compromise the suitability of park roads for recreational uses," and consequently the National Park Service considers Alternative B to be unsatisfactory. (*id.* at p. 63).

Although the traffic-related problems in Rock Creek National Park are projected to become even worse in the future, we believe that the current situation on Beach Drive is already becoming unacceptably bad. The presence of a high volume of speeding commuter traffic on Beach Drive has compromised core environmental and recreational values recognized in the park's establishing legislation. Beach Drive has become a *de facto* commuter highway during rush hours, preventing safe recreational use of the heart of the park during those hours.

Because Beach Drive is a narrow road with blind curves, it is unsafe for recreational users when automobile traffic is present. This fact means that Beach Drive is essentially closed to walkers, runners, cyclists, in-line skaters, children and others when automobiles are present. Commuter traffic creates noise and air pollution, which diminish recreational users' experience (and potentially their health) not only along Beach Drive but also on surrounding hiking trails. The sense of solitude that is so vital to the enjoyment of the park disappears as the 'noise and tangle' of city traffic intrude on the park. The high volume of traffic also disturbs large portions of the park's wildlife habitat, and each year automobiles kill many animals attempting to cross Beach Drive. These factors all contribute to the degradation of the natural qualities that make the park a treasured urban oasis where area residents (and wildlife) should be able to find refuge from the rest of the city.

Our members and many other Washingtonians use Rock Creek National Park for recreation and want to see this unique urban national park protected for our recreational use and for use by our children and grandchildren. Currently, in the average week, approximately 40,000 people recreate on Beach Drive, the majority of these being on weekends when portions of Beach Drive are closed to automobiles. (*id.* at p. 141). As our region's population has increased, so has the demand for recreational opportunities, and over the last two decades, recreational visits to Rock Creek National Park have doubled to approximately 2 million annually. (*id.* at pp.

6, 30). Since 1980, portions of Beach Drive have been closed to automobiles on weekends, providing recreational users with an important car-free zone for safe and enjoyable recreation. The draft plan recognizes that the weekend closures have been "very popular with the recreating public." (*id.* at p. 6).

Because the existing paved recreational trail ends just south of the intersection of Broad Branch Road and Beach Drive, recreational users must travel north on Beach Drive in order to reach the upper valley and gorge sections of the park, some of the most beautiful parts of the park. As the draft plan notes, a 1980 study by the National Park Service recommended building a separate paved trail paralleling Beach Drive north of Broad Branch Road. (*id.* at p. 29). Knowing the topography of the valley as we do, we are not surprised that after the National Park Service's team of experts inspected these sections of the valley and consulted with other District and federal agencies, they concluded that such an option could not be achieved without irreparably damaging the creek, wetlands, endangered species habitat and historic resources (*id.*). The draft plans goes on to state that "[t]hey concluded that the only way to provide a continuous recreational trail through the valley would be to permanently close sections of Beach Drive to automobiles." (*id.*).

We agree with the National Park Service's assessment, which is why we support Alternative C, permanent closure of Beach Drive from Broad Branch Road north to Joyce Road, from picnic grove 10 north to Wise Road, and from West Beach Drive north to the Maryland state line. We believe that this option would do the most to protect the core environmental and recreational values of Rock Creek National Park.

Rock Creek National Park is a remarkable natural resource—a forested, national park with a stream-cut gorge in the middle of a major city—and one of the greatest recreational resources in the nation's capital and the surrounding region. Beach Drive winds through this beautiful valley, following Rock Creek as it cuts through the forest. Without the overwhelming noise of motor vehicle traffic, one can feel at peace while hearing hear the babbling creek and singing birds. It is for such reasons that the park is enjoyed by so many people on weekends when it is available for recreation, and we believe that, given the opportunity, many people would use it on weekdays.

Alternative D would expand weekday recreation on Beach Drive during mid-day on weekdays to stroller moms, children, the retired, and the innumerable consultants, service employees, and others who do not work a traditional 9-5 weekday schedule. As it stands today, these groups are currently unable to enjoy Beach Drive for recreation. However, Alternative D would leave the area off-limits to even more people who might use Beach Drive for recreation at other times of the day. In contrast, Alternative C would open Beach Drive to recreational use all day on weekdays, greatly expanding the number of people who could take advantage of Rock Creek National Park's precious recreational and natural resources. One would be able to take an early morning run or an evening bicycle ride without the hazards posed by motor vehicle traffic. Permanent closure would enhance the quality of life for far more people all over the Washington, D.C., region.

Another key point is the fact that Beach Drive was not designed for moving traffic through the park but instead to give people *access to* the park. The National Park Service itself recognizes that non-recreational use of park (i.e., commuters in motor vehicles) is a "secondary purpose" permitted only if it does not pose an undue threat to visitor safety, harm the park's resources or create excessive congestion. (*id.* at p. 55). This conclusion seems to be at odds with the National Park Service's choice of Alternative D, which essentially grants commuters a special use permit to be the sole users of Beach Drive during the morning and evening rush hours.

Some area residents fear that closing Beach Drive to commuters would exacerbate traffic on main north-south arteries like Connecticut Avenue, Wisconsin Avenue, 16th Street and others. However, a license plate study commissioned by the National Park Service in 1996 found that many rush-hour drivers use park roads to cross the park east-west rather than traveling north-south. (*id.* at p. 148). Beach Drive closures under Alternatives C and D have, by keeping east-west traffic routes open, been specifically designed so as not to affect east-west traffic flow.

According to the draft plan, in the morning only three percent of the vehicles that enter the park at the Maryland state line actually exit onto the parkway. (*id.*). In the morning, 71 percent of vehicles that exit onto the parkway actually enter Rock Creek National Park *south* of the proposed Beach Drive closures – 17 percent enter at Broad Branch Road, 20 percent at Blagden Avenue, and 34 percent at Piney Branch Parkway. (*id.*, emphasis added). In the evening, only one percent of the vehicles that enter from the parkway exit the park at the Maryland state line. (*id.*). In the evening, 70 percent of vehicles that enter from the parkway actually exit Rock Creek National Park *south* of the proposed Beach Drive closures – 18 percent exit onto Broad Branch Road, 19 percent onto Blagden Avenue, and 33 percent onto Piney Branch Parkway. (*id.*, emphasis added). These figures clearly demonstrate that a relatively small percentage of commuters would be affected by closure of sections of upper Beach Drive during the morning and evening rush hours.

Although the 1890 legislative establishing Rock Creek National Park directs that roads be built in the park, it did not state where those roads should be constructed, nor did it state that driving automobiles should be the dominant use of park roads. It is doubtful that the Members of Congress who created this park could have contemplated that one day the park would be enveloped by urbanization nor that commuter traffic would one day exclude recreational users from the heart of the park. Use of the park has changed in ways they never imagined, and park management must evolve to account for this by limiting the use of some roads to recreation free of automobile traffic. Even under Alternative C, the majority of park roads would remain open to automobiles, allowing access to virtually all picnic areas and even permitting what some would describe as "pleasure driving."

While the Sierra Club is sensitive to concerns that commuter traffic could increase on other roads, national parks were not created to solve traffic problems. Regional transportation planners must properly manage the region's traffic without relying on Beach Drive as a crutch. We support sensible efforts to reduce traffic congestion through the city and the region by improving public transportation and providing automobile commuters with more

environmentally friendly, convenient and affordable alternatives to driving. We must not sacrifice our precious parks and green spaces in the name of commuter traffic flow.

#### ***Improve Traffic Control on Other Park Roads***

Under any alternative, the National Park Service should take addition measures to control traffic on all park roads open to automobiles. First, impose high occupancy vehicle (HOV) restrictions on roads known to be used by commuters so that only drivers who carpool with two or more occupants per vehicle (HOV-2) are granted the privilege of using park roads during rush hours. The 1996 license plate study commissioned by the National Park Service found that the majority of drivers during rush hour are in single occupancy vehicles. *(id.)*. Implementing a HOV-2 requirement would provide area commuters with an incentive to help solve the region's air quality problem by decreasing the number of cars on the roads. Second, on all park roads at all hours, but particularly during rush hour, improve speed limit enforcement, using automated photography and other options to ensure that drivers obey posted speed limits. Third, implement traffic calming measures such as speed humps or other techniques, but select these with sensitivity to the shock sensation that cyclists, in-line skaters or other wheeled recreational users would feel riding over such measures.

#### ***Improve Recreational Trails***

Under any alternative, the National Park Service should take action to improve all park trails. The paved trail parallel to the Rock Creek and Potomac Parkway and Beach Drive should be improved by realigning sections of trail where prudent and maintaining a smooth surface for wheeled recreation. We urge the National Park Service to explore permeable hard surface alternatives to asphalt if such alternatives are feasible given park conditions. The National Park Service should work with the National Zoo to find a way for the zoo tunnel bypass trail to remain open continuously for recreational users. The path through the tunnel is too narrow and poorly lit to be safe. Further, the National Park Service should improve and maintain unpaved hiking trails and bridle paths throughout the park to ensure that they are safe and not prone to excessive erosion.

#### ***Improve Non-motorized Access Points***

Under any alternative, the National Park Service should explore feasible options for improving park access for non-motorized park users. Too few access points to Rock Creek National Park exist so that pedestrians and bicyclists may access the park safely without competing with automobiles.

#### ***Improve Park Interpretation, Education and Information***

Under any alternative, the National Park Service should strive to improve the park interpretation, education and information that it offers to the visiting public. We recognize that the park's 24 entry routes present unique challenges in permitting the National Park Service to reach park visitors. As the National Park Service recognizes, many park visitors do not realize they are in a national park. *(id.* at p. 30). We recommend that the National Park Service place

signs at all entry points announcing that visitors are entering Rock Creek National Park. Where appropriate, such signs should include orientation information and a map clearly showing the location of the sign as well as National Park Service visitor centers and other notable park features. We also suggest that the National Park Service explore the feasibility of broadcasting a radio transmission through the park, as is done at other national parks, to provide park information to drivers, including information about visitor centers and restrictions on traffic on various park roads. Appropriate signs at park entry points should inform drivers of the radio frequency.

The Sierra Club would support the National Park Service vacating exiting park administrative offices at Peirce-Klingbe Mansion and the U.S Park Police vacating its substation in the Lodge House provided that economical office space can be found near the park without diminishing funding available for other vital park needs such as traffic management, trail maintenance, visitor education, and other important activities. We are enthusiastic about the prospects of opening these buildings to visitors for park interpretation, education and information. We oppose the construction or any new facilities within park boundaries that would harm the park's natural environment.

#### ***Conclusion***

The draft general management plan for Rock Creek National Park offers the best opportunity since the early days of the park to implement a manage regime that will adequately protect the park from the negative effects of commuter automobile traffic on Beach Drive and on other park roads. The Sierra Club strongly believes that Rock Creek National Park will never realize its fundamental environmental and recreational values as a national park until it ceases to be a commuter highway. Therefore, we urge the National Park Service to implement Alternative C.

Sincerely,



Jason E. Broehm  
Chair, Parks & Land Use Committee  
Washington, D.C., Chapter

cc: Congresswoman Eleanor Holmes Norton  
Mayor Anthony A. Williams  
D.C. Council members  
Dan Tangherlini, Director, DDOT

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From: Sierra Club  
To: Roger Williams and Sheila Macdonald  
Cc: Superintendent, Rock Creek Park

From: Williams or Macdonald  
To: nps\_rocr\_gmp@nps.gov

Subject: Rock Creek Parkway Closing

Subject: Rock Creek Parkway Closing

Dear Roger and Sheila,

Thanks for the reply to our appeal for volunteers. Sierra Club takes many controversial stands, and it would be unrealistic to think that all our members would agree on any one of those positions. I do, however, want to correct your assumption that our decision was made without input from residents close to the park. Several of our executive committee members and active volunteers live close to the park and believe, like me, that parks are for other purposes than commuter throughways.

Both my significant other, Sheila Macdonald, and I, residents near Rock Creek Parkway, are unalterably opposed to any further closure of the road than is done at present. Arguments that closure for additional hours, let alone completely, to auto traffic will not increase traffic on neighboring streets simply defy reality: Where else will that traffic go, if not to streets that parallel or cut through the park or to Connecticut Ave? Where else can it go? Do proponents of closure think drivers of those cars will suddenly abandon them and either stay home or start taking public transportation? Obviously, they will do neither.

We do not dispute that arterial streets like Connecticut or Wisconsin Avenues will carry greater traffic volume with the closing of Beach Drive. We do not, however, believe that the residential streets on which most nearby residents live will be affected. As to your argument that no one will forsake their cars and take public transportation, my question would be "why not?" If public transport has become so unthinkable, it is surely because highways, cars, and gasoline have been subsidized at the expense of more sensible and benign forms of transportation. And where else would be better to change that than in a beautiful, green stream valley like Rock Creek?

We ourselves depend on Oregon and Connecticut avenues for commuting and other purposes, and we shudder to think what those routes will be like--especially during rush hours--if the parkway is closed for additional stretches of time.

And who would be better to take such a stand than Sierra Club? We have, after all, been advocates for public land since saving the Yosemite Valley in the 1890's.

I should add that I am a member of the Sierra Club, and I am very disappointed that the DC chapter has taken a pro-closure position. If its proponents lived alongside or near the park, I doubt seriously that any of them would favor closure.

Thanks again for your comments.

We, and I'm certain the great majority of our neighbors, ask the Park Service not to increase closure of the parkway at all.

Respectfully,

Sincerely,

Chris Craig  
Secretary, DC Chapter

Roger Williams  
Sheila Macdonald

-----Original Message-----

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Dear Superintendent:

I use the Rock Creek Park for bicycling on the weekends when it is closed to car traffic. I would like to use it during week days as well. I urge you to keep it closed to cars during the weekday limited hours in the current proposal.

It would be even better if someday it was closed to all car traffic. It would help to make it a commuter route for bicyclists, roller bladers and runners. This would be helpful in fighting our growing weight problems and growing air pollution problems. Thank you for your consideration of this matter.

Linda H. Freimark  
WABA Board Member  
Great Falls Group, Sierra Club, BoD

MR. CAINE: Thank you. Thank you for the opportunity to speak. My name is Brian Caine. I speak on behalf of Signatory Residents of the 1400 block of Taylor Street, Washington, D.C.

We are located immediately adjacent to the eastern most tip of Rock Creek Park at Piney Branch Parkway. I'm sure you're familiar with it.

Our neighborhood embodies what the term "east of the park" often implies' no such bars, trendy boutiques or tourist landmarks grace our streets. Personal safety and security is a constant concern. The most positive signature feature of our neighborhood is close proximity and access to Rock Creek Park. As such, we view park related issues with scrutiny and compromise proposals with a measured dose of skepticism.

Such is the case with Park Service options A,C and D for Rock Creek Park. We strongly support option B no change to current management. Closing Beach Drive during the week we view as elitist and divisive, literally locking the gates on our opportunity to fully enjoy and make use of the park during weekdays.

We are unnerved by a vocal minority who wish to limit Beach Drive access to a privileged few. While well intentioned, these self-serving interest groups exclude others while seeking maximum gratification for their own desires. We expect no consideration in their parochial views. We do, however hope, expect and demand the federal government and its agencies to fulfil their primary mission assuring all citizens equal access to federal programs, facilities and opportunities.

The proposals to further restrict or eliminate Beach Drive access woefully fail to achieve this equity objective.

Some facts. Under the MPS proposed plan senior citizens, retirees and handicapped are summarily denied open park access exactly when and how are they are most likely to visit.

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Beach Drive is already permanently closed 24 hours a day 114 days a year, nearly one out of every three calendar days. This in itself represents a significant compromise. Why is this disregarded in the current debate? Options A, C and D negatively impact safety and security in our neighborhood diminishing a quality of life fragile enough already. In closing, we acknowledge and appreciate the Park Service for its day-to-day management. However, we implore you to reconsider your inequitable proposals. Implement option B no change to current management which maintains a pragmatic, political and citizen endorsed compromise on Beach Drive usage. Do not lock the gates on us. Preserve an environment where we all can enjoy this great resource on an equal basis.

**NEAL R. GROSS**  
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1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

MR. WILSON: Good evening. My name is Dave Wilson. I live D.C. From that address, you can see I have a direct interest in this. I'm here on behalf of the 16<sup>th</sup> Street Civic Association. I want to commend the NPS and Adrienne Coleman for the openness of this process which I hope continues to be as open. Adrienne came to our Civic Association meeting and opened herself up to answering questions. We favor Alternative B, that is to say no change. Why is that? Because the benefits are not clear, but there is nothing speculative about the cost. We have a very bad traffic problem in this area, perhaps the worst in the country according to AAA. In terms of what we're looking at in our neighborhood, when you look at page 264, look at Blagden Avenue where there would be 500 vehicles at the maximum non-peak hour increase which is for some reason characterized as a minor increase in traffic. Compare that to when they characterize the traffic increase at Connecticut Avenue, north of Tildon, 500 vehicles is said to be a perceptible increase in traffic. Not being a traffic engineer but being a student of the English language, I don't understand those two statements. They seem rather contradictory particularly given that both of those areas are very common in the sense of having very heavy traffic. An additional 500 cars is quite a lot of cars. The benefits in terms of increased use by bicyclists and others during the day is really very speculative. But what is not speculative, to repeat myself, is how much traffic will be diverted into that part of 16<sup>th</sup> Street if there is a closure during the weekdays. There are two points that I want to make in closing. One is there's been a lot of talk about traffic dampening at least in the study, not much in the speeches here today. But I'm very concerned about the traffic dampening because unlike the other alternative issues which have been spelled out in some detail the traffic dampening is something that is unclear. When I asked Adrienne Coleman about it, up front she indicated that the specifics of traffic dampening would be something that would happen.

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If they are going to do traffic dampening, certainly they should study it. Then they should have the process open just as this process is open. There should be a proposal and an opportunity for comment by the people just as we're having these comments.

The final thought is there hasn't been a management plan in Rock Creek Park since it was opened in 1890. I gather it's perhaps the only major park in the system or maybe the only one that doesn't have a management plan. But if you are going to have a plan for 15 or 20 years after not having had one, what you should do is you should allow for the possibility that you might be wrong as to whatever alternative that you choose and to have the opportunity for a review spelled out within a specific period of time. If any dramatic changes are made, the review should come after one year in an open process rather than being told that this is a plan that's going to last 15 to 20 years no matter how badly it turns out. Thank you very much.

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

Subject: Comments of Sixteenth Street Heights Civic Association (SSCHA)

These comments are being made on behalf of the Sixteenth Street Heights Civic Association (SSCHA), a neighborhood association whose members would be adversely affected if NPS adopts weekend closures of the portions of Beach Drive currently closed during weekends. SSCHA strongly opposes changing the status quo and has adopted a resolution to that effect.

In particular, SSCHA is concerned about the peak diversion of 560 cars per hour on Blagden Avenue (P.264 of the NPS report) and the concomitant flow of those vehicles in SSCHA's neighborhood. We question increasing traffic congestion in this Metro area, the second most congested Metro area in the country.

Moreover, we question whether there has been a sufficient analysis of extending the bikepath. Because the NPS report has not properly considered this issue its proposed weekday closures cannot be implemented.

There are two additional points that must be considered. First, before any traffic dampening measures can be taken, there must be an opportunity for public comment on such measures. Second, if, contrary to SSCHA's urgings the weekday closures are initiated, public comment should be sought within one year of such initiation regarding whether the closures should be continued.

David Wilson  
Second Vice President, SSCHA

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TI FERETH  
ISRAEL

7701 16th Street, NW  
Washington, DC 20012  
Tel 202-882-1605  
Fax 202-829-0635  
TTY 202-882-7041

*רוחני*  
Rabbi  
Ethan Seidel  
A conservative  
egalitarian congrega-  
affiliated with the U  
Rabbi Ementus  
A. Nathan Abramowitz  
Synagogue of  
Conservative Judaism

7/7/03  
ד' תמוז תשס"ג

Superintendent Adriene Coleman  
Rock Creek Park  
3545 Williamsburg Lane  
Washington, DC 20008

Dear Ms. Coleman:

Concerning the National Park Service's plan to close parts of Rock Creek Park during to auto traffic during non-rush hour periods. I am in favor of your plan, for the following reasons:

- 1) As someone who both lives and works in Ward 4, and whose office window looks out on 16th street during the day, I can attest to the fact that (even during the present construction on 16th St.), there is not too much traffic on 16th St. when rush hour is over. The few extra cars from the Park could easily be accommodated on 16th St.
- 2) As a bicycle commuter (I have cycled well over 10,000 miles in the District and surrounding suburbs over the last 10 years), I find that I have come to avoid cycling in upper Rock Creek Park even in the middle of the day - where there is no bike path, I must ride on the road, and the lack of any shoulder on the road makes even a small amount of traffic hazardous to my health. I have been hit by a car only once in my bicycling, and that was last year in upper Rock Creek Park, in the morning, after rush hour. (I wouldn't dare attempt the Park *during* rush hour.) It's a shame that a national park has become so hostile to anything but motorized traffic.

I hope you will press on with your alternative D, and close parts of the park to motorized traffic during weekdays.

Sincerely,  
*Rabbi Ethan Seidel*  
Rabbi Ethan Seidel



UNIVERSITY OF  
MARYLAND  
DEPARTMENT OF HISTORY

2115 Francis Scott Key Hall  
College Park, Maryland 20742-7  
301.405.4265 TEL. 301.314.9395

July 7, 2003

Superintendent of Rock Creek Park  
National Park Service  
Rock Creek Park  
3545 Williamsburg Lane, NW  
Washington, DC 20008-1207

Dear Superintendent:

In the Outlook section of the Washington Post on July 6, 2003, Jim McCarthy, coordinator of the People's Alliance for Rock Creek, claimed that the argument that closing Beach Drive on weekday mornings and afternoons will restrict the access of senior citizens and people with disabilities is "specious." I am concerned that you may think the same thing. The argument that the park will become inaccessible to people with disabilities and many senior citizens is not specious. It is, unfortunately, true.

It is my experience that accessibility is easily overlooked or misunderstood when able-bodied people make decisions. I sit on the University of Maryland's Architectural Design Standards Board and have had innumerable discussions with architects about why their plans will not make a building truly accessible. Their misunderstandings or ignorance seems to be shared by Jim McCarthy and I fear may also be shared by you.

If Beach Drive is closed, I and others who use crutches, canes, walkers, and wheelchairs will no longer be able to enjoy the park. The same is true of people who use no devices but have trouble walking. The access roads into Beach Drive are too long and too hilly for us to navigate, not to mention that there is no parking along the borders of the park. We do not walk or roll long distances. What makes the park so wonderful now is that it is as accessible to us as it is to bike riders, skaters, and exercise walkers. We can drive into the park, stop at one of the eight picnic groves, and enjoy the park, either by getting out of our cars, or simply by sitting and enjoying the area with the car doors open. This may seem like a little thing to you, but it is important to us.

I don't know if it is legal for you to make the park inaccessible to the disabled, but it should not be. It is what the spirit of the Americans With Disabilities Act, if not the letter, is all about. I urge you to keep Beach Drive and all of the park open for all of the people, not just for the young and able bodied. I support alternative B, the no close option.

Sincerely,

*Gay U. Gullickson*  
Gay U. Gullickson  
Professor

2100 Washington Avenue  
MD 20910  
301-565-3041

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Dear Superintendent Coleman,

I'm writing because I STRONGLY SUPPORT THE WEEKDAY CLOSURE OF UPPER BEACH DRIVE TO COMMUTING MOTORISTS who are merely passing through Rock Creek National Park. It should be clear to anyone who appreciates our natural heritage that Rock Creek National Park is a priceless and irreplaceable asset in the heart of DC and should be managed as a real park seven days a week (and, ideally, 24 hours a day), not as a shaded commuter highway.

I won't repeat the many valid arguments for this position because they have been stated repeatedly by others for decades. I am truly puzzled, however, why NPS failed to even test weekday carfree recreation zones during the past seven years since the June 1996 series of public meetings on the Rock Creek Park GMP. FOR SEVEN LOST YEARS, NPS management continued to allow Rock Creek Park to be severely and inappropriately degraded as a scenic route for automobile commuters who selfishly insist on driving through the primary greenway of a city with the second largest rail rapid transit system in the USA plus an extensive bus transit and arterial street system. In my opinion, NPS management of Rock Creek Park has been weak and irresponsible, dishonoring its true mission.

Instead of only now proposing a midday test closure of upper Beach Drive during weekdays, NPS could have ample data demonstrating that such a closure would vastly improve the park and its natural habitat, while negligibly affecting traffic volumes or congestion elsewhere in DC. NPS could now be proposing to extend this closure to all but six hours each weekday or perhaps to all hours of the day, measures that would much more effectively manage Rock Creek National Park for its intended purposes as a public pleasure ground and natural preserve.

The proposed weekday recreation hours won't allow Washingtonians to truly enjoy Rock Creek Park either before or after normal work hours or to enjoy upper Beach Drive for pollution-free commuting by bicycling, skating, or running. Moreover, Beach Dr will remain a corridor for congested, motorized commuting.

Before closing, I ask that NPS correct the deplorably decrepit and unsafe conditions of its paved shared use paths in Rock Creek Park, particularly the steam valley path running south of Broad Branch Rd. This path should be rebuilt on a straighter and wider alignment so that it truly meets AASHTO's current minimum design guidelines for paved shared use paths. I'm certain that the regional bicyclist and trail-user communities would strongly support an NPS request for the necessary funds.

Sincerely,

Allen Muchnick, President  
Virginia Bicycling Federation  
PO Box 5621, Arlington VA 22205  
<http://vabike.org>

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MS. MCCANN: Hello, I'm Barbara McCann, M-C-C-A-N-N. I live on the east side of the park. Tonight right now I am speaking as a board member of the Washington Area Bicyclists Association which represents more than 7,000 people in the Washington Region.

WABA has been working since 1978 to improve bicycle access to the trails in Rock Creek Park and management of motorized portions of the roadway. A new national survey shows that 53 percent of Americans want to bicycle more, yet one half of Americans are dissatisfied with the cycling environment. Most of those people want more and better cycling facilities.

Alternative D offers us some of those facilities. It will increase access to bicyclists in the heart of the park for both recreation and for transportation while preserving 90 percent of the roads in the park to motorists 100 percent of the time. It's a beginning of a more balanced approach to using this resource.

Beach Drive is restricted now. Bicyclists, people with strollers, and people who want to walk in the park are not able to do so on Beach Drive because of the traffic. It's unfortunate that the valley is so narrow that we cannot have separate facilities, but that is simply the way it is. You can't stand on Boulder Bridge and admire the leaves and the creek on weekdays. You can only do that on weekends. As we know, that's a very popular use of the park.

Thirty-four percent of residents in the District of Columbia don't even own automobiles, and they are unable to use this portion of the park. In addition, Rock Creek Park is a national park and a national resource. While some local residents may oppose this plan, WABA believes the higher use of this national park is to open it for use by tourists, people who work unusual shifts and cannot access Beach Drive on the weekends, children in school groups, and even workers who work in work sites around the national park and can come down on their lunch hours and use this facility.

Restricting through traffic will in fact connect upper Rock Creek Park and beyond all the way down to the National Mall enabling tourists on bicycles to enjoy Washington's well known monuments as well as this natural area. As a previous speaker said, there are hundreds of roads available for through traffic in the District of Columbia and Maryland. There's only one Rock Creek Park. WABA would like Alternative D to be chosen.

**NEAL R. GROSS**  
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WASHINGTON, D.C. 20005-3701

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July 15, 2003

Adrienne Coleman, Superintendent  
Rock Creek Park  
3835 Williamsburg Lane, NW  
Washington, D.C. 20008-1207

Dear Superintendent Coleman:

On behalf of the Washington Area Bicyclist Association (WABA) I am submitting the following comments on the draft general management plan for Rock Creek Park. Our comments can be generally placed in four categories: 1. Paved trails in the Park; 2. General motorized traffic in the Park; 3. Traffic management on Beach Drive in the Park; and 4. Impacts of Park management on adjacent communities.

### 1. PAVED TRAILS

The paved trail in Rock Creek Park is unsafe due to a number of factors. The management plan proposes to rehabilitate the existing trail, including realignments of the trail in some area. There are problems that merit specific mention in the plan.

**A. Trail Design.** The absence or insufficiency of design for the trail lies at the root of many of the trail's problems. The section of the trail south of Shoreham Hill, which is dangerously close to motorized traffic, is one such design problem area. Another design disaster on the trail is the western approach to the Zoo tunnel. A narrow, deteriorating bridge over the Creek at this busy juncture puts all trail users at great risk of inadvertently falling into the roadway or the Creek. While the management plan referenced the need for a 24 hour Zoo tunnel bypass for the trail, the need for a safer bypass in this area needs to be inserted.

Trail width is insufficient throughout the Park. While it may not be possible to achieve the trail width design standards of the American Association of State Highway Transportation Officials (AASHTO) in certain segments of the trail, opportunities to widen the trail at transition points would be particularly useful, such as the P Street trail crossing. Because the natural setting of the trail restricts its width south of Shoreham Hill, the realignment of Rock Creek and Potomac Parkway scheduled for this fiscal year represents a tremendous opportunity to achieve safer trail widths. Such an opportunity presented itself in 1999, when the District Division of Transportation's rehabilitation of the M Street Bridge resulted in a realignment of the Parkway under the Bridge to increase the trail width by one foot, a tremendous safety improvement. WABA encourages the Park Service to seize this chance to improve the safety of the entire length of this trail segment through the realignment of the Parkway.

**B. Trail Surface.** Improved trail design could help mitigate the silting of the trail surface that occurs repeatedly in the Park. Another trail surface issue is the presence of granite cobblestones under the Pennsylvania Avenue Bridge. This is an unsuitable trail surface for bicyclists, rollerbladers, and wheelchair users and should be replaced.

**C. Access.** WABA supports the Park Service's commitment in the management plan to resolve the issue of limited access for trail users in the vicinity of the National Zoo. Paved trails are also the solution to better connections to neighborhoods adjacent to the Park, a problem that was identified in the management plan.

### 2. TRAFFIC CALMING

WABA supports the implementation of an aggressive traffic calming program in Rock Creek Park to improve the safety of all Park users. Speed tables, enforcement through automated photography, improved signage and enforcement all contribute to the safety and enjoyment of Park visitors, be they motorists or non-motorists.

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### 3. SUPPORT FOR NATIONAL PARK SERVICE MANAGEMENT ALTERNATIVES

WABA supports the National Park Service's preferred traffic management alternative D, as well as the traffic calming, trail improvements, and Rock Creek and Potomac Parkway Zone provisions of alternative A and C. These provisions leverage the metropolitan Washington regional investments in trail development and traffic demand management strategies to achieve a higher return for tax dollars spent.

### 4. IMPACT ON ADJACENT COMMUNITIES

Much has been stated during the public comment period about impacts from changes in the status quo for adjacent neighborhoods as it relates to motorized traffic. Less publicized has been the effect of balancing motorized and nonmotorized visitor access for neighborhoods in which there is relatively low automobile ownership, as is the case in the District of Columbia neighborhoods of Adams Morgan and Mount Pleasant which are adjacent to the eastern border of the Park. In these densely populated neighborhoods, the 2000 Census documented that about 50% of the households did not have access to a car. Unless some provision is made for nonmotorized visitation to Rock Creek Park Monday through Friday, these Park neighbors will be unable to access the heart of the Park Monday through Friday. The need for access to the Park for persons without automobiles was documented in the 1918 Rock Creek Park Study conducted by the Olmsteds. This need remains unmet today. WABA commends the National Park Service for its public participation process in the development of this plan. WABA supports the National Park Service's stewardship efforts embodied in the draft final general management plan.

Sincerely,  
Ellen Jones  
Executive Director  
Washington Area Bicyclist Association

WashingtonParks@aol.com  
Subject: Comments on Draft Rock Creek General Management Plan

Ms. Adrienne Applewhaite-Coleman, Superintendent  
Rock Creek Park, National Park Service  
3545 Williamsburg Lane, NW  
Washington, D.C. 20008  
July 15, 2003

Dear Superintendent Coleman:

On behalf of Washington Parks & People, I am writing to provide comment on the draft General Management Plan for Rock Creek Park. We thank you and the National Park Service for this important opportunity to provide input on the future of one of America's most important major urban parks. Sadly, Rock Creek Park's value as the 15th largest urban park in America is undermined by the ways that it has become severely under-valued, under-funded, under-connected, and, especially during rush hours, over-driven.

For too long, much of the budgeting, management, and future of Rock Creek Park has revolved around its roadways. We believe the time has come for a comprehensive plan to make the entire park come alive as the great natural and cultural resource that it is -- for its adjacent and nearby communities, for the Capital and surrounding region, and for tourists coming to DC from across the nation and around the world. In this spirit, we support a new emphasis on non-motorized recreation throughout the Park, combined with broadened and innovative community-based environmental education, stewardship, and programming of all kinds. This should include the following components:

1. ACCESS. The Park urgently needs to restore, enhance, or construct non-motorized trails into the Park from the communities along its entire eastern boundary. The lack of sufficient safe, welcoming, and maintained non-motorized access at numerous key sites along the east side of the Park is a major environmental injustice that severely undermines the park's value and significance in the lives of tens of thousands of people living in the city's most diverse neighborhoods.

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2. CONNECTION. There should be more easy, enticing, and educational connections between the Park and the wider Fort Circle, Escarpment, C & O Canal/Capital Crescent, and Potomac Heritage National Scenic Trails.

3. PUBLIC EDUCATION & PARTNERSHIPS. The Park General Management Plan will not be complete absent a comprehensive interpretive plan for the park. Going beyond the present locus of interpretation in a small section of the upper part of the Park, the interpretive plan should include a fuller assessment of the cultural and environmental programming and stewardship possibilities for the entire Park. This is essential for restoring and deepening lasting community engagement in supporting the life and future of the Park. The plan should identify and work with community partners to assess and develop interpretive and stewardship programs for significant geological, ecological, and cultural sites throughout the park. In addition to all of the sites within the main part of the Park, the plan should link the Park to sites of historic significance that are adjacent to or near the GMP study area, such as Montrose and Dumbarton Oaks Parks, the Mount Zion and Female Union Band Cemetery, Jackson Hill and the Holt House, Historic Adams Mill Road, the Pierce Park African American and Quaker burial grounds, the Calvert Street "toddle house," Meridian Hill Native American spiritual ground, and similar historic sites. It is critical that the interpretive plan be integrated into the GMP, so that critical facilities, operations, stewardship, circulation, and funding questions are addressed in the context of interpretive needs and possibilities. In this way, every program in the Park will advance a broad-based, active, permanent constituency to stand up and help the park, such as those that help other major urban parks across the nation. Finally, the comprehensive interpretive plan should develop options for working with community partners to develop interpretive programs and products and to advance permanent community-based park advocacy, partnership, and conservancy.

4. CAPITAL CAMPAIGN. As others have done across the national park system, the Park should ambitiously seek a broad range of public, philanthropic, and earned revenue. The Park should assess the Park's comprehensive capital needs, proposed improvements, and possible funding sources. Such capital projects could include the following:

- more ambitious eradication of invasives and restoration of native plants and habitats;
- more environmental and cultural heritage documentation;
- more interpretive programs, products, and facilities for boosting public understanding and appreciation of the Park;

- more far-reaching preservation and restoration of the park's less known cultural sites, such as the Miller Cabin, Soapstone Quarry, other mill locations, spring houses and similar outbuildings, and other archeological sites; and  
- endowed gifts to support ongoing enhanced stewardship and programming in the Park.

5. WIDENED OUTREACH. To better connect to DC's densest and most diverse populations, as well as to one of the prime areas where tourists enter the Park, the Park should re-establish public use of at least part of Edgewater Stables, as a base of interpretive programming for the lower Park. Just as the other administrative and operational functions are proposed to be moved out of the Park, the regional Park Police horse training function at Edgewater should be examined to determine whether it is serving the Park in its present location. The adjacent historic lower Bridal Path and retaining walls should be restored, along with the historic path from Pierce Park and Jackson Hill into the Park. This outreach should include a massive increase in use of volunteers to assist the Park. Parks & People can assist with this effort.

6. INTERPRETIVE SALES & CONCESSIONS. The Park should identify avenues for the Park to benefit from sales of appropriate interpretive materials, fees for audio tours and other programs, and concessions that could enhance the visitor experience such as bike rental, refreshments, and natural gas-powered trolley loop tours of the Park.

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7. MITIGATION OF VEHICULAR DAMAGE. The volume of rush-hour traffic in the Park, coupled with the high speeds of vehicles in many sections of the Park at all times, cause severe damage to the value and visitor experience of the Park. In addition to the proposed traffic calming, the Park should explore reducing the 25 mph speed limit to 15 mph, and charging fees for vehicular through traffic during rush hour. The costs to the Park of supporting this function are inappropriate to be borne by NPS and all those who wish to use the Park at the beginning and end of each day. The Park should continue to work to enhance non-motorized options for all to access and experience the Park at all times.

Thank you for your attention. Washington Parks & People looks forward to working with NPS and Rock Creek Park as the draft GMP is fleshed out into a more comprehensive and encompassing document. We stand ready to assist in any way with the implementation of these recommendations.

Sincerely,

Steve Coleman, Executive Director  
Washington Parks & People  
Josephine Butler Parks Center  
2437 15th Street, NW  
Washington, DC 20009  
washingtonparks@aol.com  
<http://www.washingtonparks.net>

MR. COLES: Good evening. My name is Alphonso, A-L-P-H-O-N-S-O, Coles, C-O-L-E-S. I represent the Washington Regional Network for Liveable Communities, WRN, a local non-profit organization promoting transportation investments, land use patterns, and neighborhood designs that enhance existing communities and the environment of the Washington, D.C. Region.

WRN strongly supports the National Park Service's recommendation of Alternative D of the general management plan EIS to restrict motorized access in Rock Creek National Park during weekdays. Expanding current restrictions on Beach Drive to include the 9:30 a.m. to 3:30 p.m. on weekdays is an important effort improve safety and promote recreational opportunities within the park.

The popularity of Beach Drive for commuting has led to conflicts with its use for recreation. Many of the park's roadways do not have designated lanes for bikers and joggers, making them dangerous for recreational use.

Alternative D strikes a strong balance by creating the best possible experience for non-motorized recreators and drivers. Although Beach Drive is used by commuters during rush hour, there is low traffic flow during the rest of the day. A traffic study conducted for the National Park Service found that a partial closure of Beach Drive would not significantly increase traffic congestion on alternative roads.

As traffic congestion continues to increase in the Washington area, policies are needed to encourage non-motorized travel. Weekday recreation zones on Beach Drive would encourage alternative transportation modes, cycling. The first closures of Beach Drive to cars in the early 1980s were successful in making Rock Creek Park the recreational mecca that it's known for today drawing thousands of visitors on the weekends.

Enjoyment of the park along much of Beach Drive is currently limited to weekends. Restricting automotive traffic during weekdays will greatly expand recreational opportunities and significantly advance the park in creating the best possible experience for its visitors.

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The weekday restrictions coupled with the proposed measures to improve visitor safety, controlled traffic speeds throughout the park, and education opportunities will go a long way in enhancing the overall experience of Rock Creek National Park. Alternative D gives everyone, retirees, families with small children, school groups, and tourists the chance to run, skate, walk, bike, and enjoy the park everyday, not just on weekends. Thank you for the opportunity to testify.

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

Subject: Closure of RCP to traffic

I am writing to endorse the management plan proposed for RCP that entails closure of Beech Drive from 9:30 to 3:30 on weekdays. RCP is one of the great treasures of the DC area. I am a bicycle commuter and weekend cyclist. I have learned to LOVE those gates that stop traffic at several junctures in the park, and make it safe and enjoyable for extended rides on weekends. Having the same option on weekdays would be a great improvement in the quality of the park, and I would alter my commute hours to take advantage of the hours the park is closed to commuters.

I drive in RCP, as well; it is the best route between my home in Mt. Rainier in Prince George's County and Reagan National Airport. But the recreational benefit of a park closed to automotive traffic far outweighs the minor inconvenience of finding alternate routes. I hope you will uphold the park's highest use and not yield to commuters, who have several other choices.

Paul Jolly  
Regional Director of Development, Midwest  
The Wilderness Society  
1615 M Street NW  
Washington DC 20036

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Subject: Rock Creek Park Weekday Closure Support

Dear Fellow Service Provider,

The proposal to close Beach Drive in Rock Creek Park during the weekday is a step in the right direction! This proposal is in full alignment with the "Keep America Beautiful" program and shows a solid, well thought out and reasonable measure towards that end.

As the director of a non-profit organization that just adopted a section of Beach Drive to clean-up once a month, I find that the additional closure times will not only open the park to recreational activities; it will protect the earth, air and water from further litter, pollution and noise activity.

Our park is a national treasure that deserves our full community support. Thank you for your service and efforts.

Sincerely,  
Shawn K. Supers  
Director, Wise Women Foundation  
1852 Ingleside Terrace, NW  
Washington, DC 20010



**Woodley Park**  
Community Association

P.O Box 4852 Washington, D.C. 20008

July 8, 2003

Superintendent, Rock Creek Park  
3545 Williamsburg Lane, NW  
Washington, DC 20008

RE: Draft General Management Plan, Environmental Impact Statement Summary  
Rock Creek Park and the Rock Creek and Potomac Parkway

Dear Superintendent:

This letter is submitted by the Woodley Park Community Association (WPCA) on behalf of Woodley Park and its 7000 households. At its June 2, 2003 meeting, the WPCA's Executive Board reviewed and discussed the draft plan, with particular attention to *Table 2: Summary of Key Features of the Alternatives*.

Based on that discussion, the Executive Committee adopted the following statement:

"The WPCA supports Alternative B (Continue Current Management/No Action), preferably with additional improvements to vehicular safety. The WPCA has strong reservations about Alternative A (Improved Management of Established Park Uses) and Alternative C (Nonmotorized Recreation Emphasis)

"The WPCA believes also that any assessments of the effect of the Draft Plan's Alternatives on traffic in Woodley Park included in existing Environmental Impact Statements are out of date and inaccurate.

The WPCA therefore requests that the final Environmental Impact Statement include an assessment of the effects of Alternatives on traffic efficiencies and intersection grades for the following Woodley Park intersections: Connecticut Avenue and Calvert Street; Connecticut Avenue and Woodley Road; Connecticut Avenue and Cathedral Avenue; Calvert Street and 24<sup>th</sup> Street; and Calvert Street and 29<sup>th</sup> Street."

We look forward to further discussing the proposed options with you. Thank you in advance for your attention to our concerns.

Sincerely,  
  
Barbara J. Ioanes, President

cc: National Park Service, National Capital Region Office

**Appendix D**

**Form Letter, Petition, and Post Card  
Comment Letters**

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**Appendix D  
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@bikethesites.com  
To: rocr\_superintendent@nps.gov,  
cc:  
07/16/2003 01:44 AM GMT  
Subject: Help Rock Creek Park

National Park Superintendent Adrienne Coleman  
Rock Creek Park 3545 Williamsburg Lane NW Washington, DC 20008

Dear National Park Superintendent Adrienne Coleman,

I am writing to SUPPORT the National Park Service's preferred option to establish weekday recreation zones on Beach Drive in Rock Creek Park. Rock Creek Park is one of the great treasures of the Washington area, but as currently managed, the heart of the Park is available only to motorists five days a week. I commend the Park Service for seeking a balanced approach that will allow pedestrians, cyclists, roller bladers, and people of all ages and physical abilities to experience the Park seven days a week.

Sincerely,  
Stephen Marks  
Bethesda, Maryland 20814

cc:  
Delegate Eleanor Norton  
Representative Chris Van Hollen

"Jennifer L Toole"  
To: <rocr\_superintendent@nps.gov>  
Subject: RE: Beach Drive

07/15/2003 03:02 PM AST  
Please respond to jtoole

To Whom it May Concern,

I am writing to SUPPORT the National Park Service's preferred option to establish weekday recreation zones on Beach Drive in Rock Creek Park. Rock Creek Park is one of the great treasures of the Washington area, but as currently managed, the heart of the Park is available only to motorists five days a week. I commend the Park Service for seeking a balanced approach that will allow pedestrians, cyclists, roller bladers, and people of all ages and physical abilities to experience the Park seven days a week.

\* Beach Drive is one of the greatest recreational resources in the Washington, DC area and is used by thousands of people on weekends. Expanding this opportunity to weekdays would enhance quality of life for people all over the Washington metropolitan area.

\* Beach Drive's recreation zones are part of a growing network of trails that make Washington and Montgomery County a prime destination for recreation.

\* Beach Drive would remain open to motor vehicles 18 hour per day, including peak commuting hours during the morning and evening rush hour.

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\* The draft NPS plan is a very modest proposal, since it would provide for recreation zones for only 6 hours per day, during off-peak hours when traffic is relatively light.

\* Beach Drive is not just another road for moving cars. It is a road that runs through a woodland, next to a stream, right in the heart of the city. Expanding its availability for recreation is a better use of this wonderful resource.

\* Weekday recreation on Beach Drive is supported by more than 30 local environmental, recreation and community organizations.

Thank you very much for your consideration.  
Jennifer Toole  
Columbia, MD 21044

To: rocr\_superintendent@nps.gov  
07/15/2003 11:50 AM EDT  
Subject: Comments on Rock Creek Park closure proposals -

To: Superintendent, Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008

From: Carole Shifrin  
Resident of Washington, D.C.

Re: Rock Creek Park closure proposals

I urge the National Park Service to leave intact the current usage of Rock Creek Park. The park is a wonderful place for DC residents and visitors alike, and closing off some of it during weekdays would lessen access for citizens who want to enjoy it. A portion of the park already is closed off to automobiles during weekends and holidays, and while I applaud that bicyclists and walkers can enjoy that portion of the park free of automobile traffic, even that limits its use by many who cannot bicycle or walk the distances required during its closure.

During the week, I often take older friends-people in their 80s-to that portion of the park being considered for closure, where we can enjoy the greenery and the quiet, where we can sit and talk and marvel at those who had the foresight to create our wonderful in-town park. If that access is cut off, it will make the park-envisioned as a green oasis for city dwellers including drivers-accessible only to bicyclists and hardy hikers. They are surely a minority.

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Those who don't fall into that category represent the majority of citizens, and they should be able to enjoy this beautiful resource. The automobile traffic during the hours of the weekday you are considering closing the park is not so great that bicyclists and hikers cannot also enjoy it, along with people who must drive to get to spots along the roads to enjoy their surroundings.

I also think there is a safety and security issue; limiting access during the week will make the park a more lonely spot, more likely to lead to potential dangers. As an avid walker myself, I would feel uncomfortable using the park roads and pathways during the week if broad access is cut off. During the weekend, there are so many people bicycling and walking on those roads that there is "safety in numbers" and no one would feel threatened. The numbers of bicyclists and walkers would be considerably smaller during the week.

I am an environmentalist and have long supported several organizations interesting in saving our wilderness, national parks and preserving greenery in cities for the enjoyment of citizens. I urge you to keep access to Rock Creek Park open, so it may be enjoyed and used by as many as possible.

Sincerely,  
Carole A. Shifrin  
Washington, D.C. 20015

"Dave Rabinowitz"  
To: <rocr\_superintendent@nps.gov>  
07/11/2003 04:11 PM MST  
Subject: Beach Drive Recreation Closure Proposal

Hi,

I support the proposed closure of Beach Drive to motorized vehicles during off-peak periods. I understand that during those hours the usage is about 200 cars per hour, or about one car every 18 seconds. The addition of that number of cars to other city street traffic would not be noticeable, but the availability of a safe place to hike, skate, bike or otherwise enjoy the road would be very noticeable and very welcome. We should preserve Rock Creek as a Park, not a Parkway. I believe a 3-month trial would alleviate the fears of opponents and clearly demonstrate the value of the transfer of the road from transit purposes to people purposes.

Thanks,  
Dave Rabinowitz

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ROCR 2134  
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This Comment was Created on 04/25/2003

**Name:** Ben Butler  
**City:** Morristown  
**State:** TN  
**Zip:** 37814

**Comments:** Dear Superintendent Coleman I support American Whitewater and agree that the General Management Plan for Rock Creek National Park is woefully inadequate in addressing management of Rock Creek. The Plan should specifically authorize canoeing and kayaking in recognition that these activities are a traditional use of the Park and have been for at least 35 years. The namesake river, Rock Creek, is regularly subjected to sewage overflows and urban runoff. It is a tragedy of the first order that the primary river in our Nation's Capitol is not better protected and that the Park Service is not doing more to recognize the problem and improve sanitation such that other recreation activities such as fishing and wading may be permitted in the Park. The Plan should specifically address the continuing issues of water quality and sanitation. The Park must develop a planning mechanism for improving water quality throughout the Park and restoring the creek for fish health and viability, as well as public health. Sincerely, Ben Butler ps. Plaese keep my address, e-mail address, and phone number private.



Superintendent Adrienne Coleman  
Rock Creek Park  
3545 Williamsburg Lane NW  
Washington, D.C. 20008

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DEAR SUPERINTENDENT COLEMAN, ROCR 2134

I am writing to SUPPORT the National Park Service's preferred option to establish weekday recreation zones on Beach Drive in Rock Creek Park. Rock Creek Park is one of the great treasures of the Washington area, but as currently managed, the heart of the Park is available only to motorists five days a week. I commend the Park Service for seeking a balanced approach that will allow pedestrians, cyclists, roller bladers, and people of all ages and physical abilities to experience the Park seven days a week.

Sincerely, 

Name (please print) Peter Kho

Address 57 N. S. W. D. 20008

Additional comments: \_\_\_\_\_

\_\_\_\_\_



# Keep Beach Drive Open

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To: The National Park Service

The National Park Service would like to close Beach Drive to those who drive on our historic parkways every day. We would like to speak out against this action to stop this from happening. We the undersigned Support Alternative B and want to keep Beach Drive open for all to enjoy.

Sincerely,

The Undersigned

[Click Here to Sign Petition](#)

[View Current Signatures](#)

The Keep Beach Drive Open Petition to The National Park Service was created by and written by Ann Ford. This petition is hosted here at [www.PetitionOnline.com](http://www.PetitionOnline.com) as a public service. There is no endorsement of this petition, express or implied, by Artifice, Inc. or our sponsors. For technical support please use our simple [Petition Help](#) form.

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7/14/2003

BY: JUL 15 2003

MAILED  
MAY 13 2003  
BY:

TO: Mayor Williams and the National Park Service

I am vehemently against the proposed closing of Rock Creek Park to vehicles during week days, non-rush hours, as well as weekday evenings.

Also, I am opposed to any HOV-type Car Pool Restrictions on Rock Creek Roads during weekday mornings and afternoon rush hours.

Maintain the present traffic patterns through Rock Creek Park.

Keep Rock Creek Park open to all people, all ages, all vehicles.

Name: Ann Ford Signature:

Address: 2700 31st St NW  
please print (include city, state, zip)

Phone No. (with area code) 571 621 6216

To: Superintendent, Rock Creek National Park

We are opposed to the weekday road closure and HOV restrictions as proposed by Alternatives A, C and D of the Draft General Management Plan for Rock Creek Park. We concur with the D.C. and Montgomery County Councils, the D.C. Department of Public Works and Maryland Department of Transportation that these corridors remain open with no new restrictions to motor vehicles. We believe any closure of Beach Drive will result in:

**Dangerous Traffic**

- A dramatic increase in the number of cars on residential streets resulting from rerouting of Beach Drive traffic.
- An intensified risk of fatalities from cars that speed through these residential streets. Approximately 55% of pedestrian fatalities occur on neighborhood roads. Studies indicate a 45% fatality rate for pedestrians hit by cars traveling at 30 m.p.h.

**Neighborhoods Turned into Thoroughfares**

- A significant number of our residential streets will be severely impacted, yet the NPS' Draft General Management Plan fails to address this.
- Diverted stop and go traffic will release increased emissions in neighborhoods.

**No Benefits for the Park**

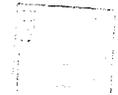
- According to the NPS Draft General Management Plan "...none of the differences to natural resources among the alternatives would be major."
- The NPS Plan acknowledges that the current management practices already preserve the important historic, cultural, and natural resources of Rock Creek Park.

Park View Citizens Association Petition

ROC.R 2871-1

- Mary Hadar
- Helen K.Mourat
- Bob Neill
- Sheila Millar
- Chris Lekakos
- Charlotte Lekakos
- Christine Tan
- Toivo Tagamets
- Malle Tagamets
- Mike Cosgrove
- Linda Cosgrove
- Nelson Rupp
- Helen Rupp
- Greg Gagarin
- Henning Schonwandt
- Richard Swift

Please contact Bob Neill if you have any questions.



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Adrienne Coleman, Superintendent  
3545 Williamsburg Lane NW  
Washington, D.C. 20008-1207

The undersigned residents of the Parkview Citizens Association submit the following comments in response to the United States Park Service's recently released draft plan for Rock Creek Park. The NPS chose out of four alternatives, Alternative D, a plan to shut the upper Park to automotive traffic during the day. The same roads currently closed during the weekends will be closed during non-rush hours during the day. We oppose the selection of Alternative D because:

1. This plan will drastically affect traffic patterns in the area, and probably increase traffic on Jones Mill adjoining the park. This will impact our area local transportation and change the community character.
2. The impact and environmental consequences of this on upstream of all of the area administered by and cared for by the National Park Service, has not been measured or taken into account.
3. We are also deeply concerned in the post-9/11 environment about a plan to shut off a major alternative route. This will have enormously damaging consequences should residents of our neighborhood who work downtown be forced to leave the city as a result of a terrorist act or threat.

As neighbors adjoining Rock Creek Park, we love and enjoy the Park. However, many of us rely on Beach Drive not only for commuting into D.C. during rush hour, but for off-hour driving to run errands, pick up children, get to work during flex-time arrangements, or, yes, to enjoy the Park. Alternative D would increase weekday traffic to residential roads as alternate routes adjoining the park, and negatively affect our quality of life. We applaud the efforts of the National Park Service to care for the Park and plan for the future. However, this ill-conceived alternative plan will adversely affect us and we urge its rejection.

There are those, especially bicyclists, who favor shutting the upper Park to autos during the weekday. The neighborhoods immediately adjoining the Park, such as Rollingwood, do not favor the alternative chosen because all traffic would be routed through their streets. Most do not have sidewalks.

The Park Service dismisses any ability to construct a bike path parallel to Beach Drive. They minimize the amount of traffic impact on side streets from Alternative D. Their studies seem to me to be shaped or shaded to get the outcome they want.

NPS is to be lauded in addressing the rising tide of commuter traffic, and in wanting to preserve the Park. The reasons they chose this alternative is because it is cheap and easy to manage. Yes they will enhance the ability of bicyclists to enjoy the Park, but only during the middle of the day when most cyclists have to work. It will not enable the majority of park bicyclists to safely ride during commuting hours.

Alternative D does not serve the community or the Park. There would be adverse impacts on neighborhoods and roads adjoining the park. NPS should work with local communities to implement better solutions.

NPS will only take note of "substantive comments". These are defined as comments that:

- Reasonably question accuracy of information in the document
- Reasonably question the accuracy of the environmental analysis
- Present reasonable alternatives
- Cause changes or revisions

Comments in favor of or against the proposed action or alternatives, or that only agree or disagree with NPS policy, are not considered substantive.

This petition, therefore challenges NPS adoption of Alternative D on the following basis:

Please sign the attached petition:



As the nation's principal conservation agency, the Department of the Interior has the responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.