

NATIONAL LINKS TRUST &
NATIONAL PARK SERVICE

ENVIRONMENTAL ASSESSMENT

ROCK CREEK PARK
GOLF COURSE
REHABILITATION

WASHINGTON, DC
SEPTEMBER 2023

QUINN
EVANS



**US Department of the Interior
National Park Service
Rock Creek Park**

**Rock Creek Park Golf Course Rehabilitation
Environmental Assessment
September 2023**

Rock Creek Park Golf Course first opened in 1923 and is located in Rock Creek Park (the park) in Washington, DC. The park was established by an act of Congress in 1890 and comprises nearly 1,800 acres within the city, with the golf course occupying approximately 100 acres in the northeast corner of the park. The purpose of Rock Creek Park is to preserve the natural, archeological, and historic resources of the Rock Creek Valley and areas of northern Washington, D.C., while providing visitors with compatible recreational opportunities and a respite within the nation's capital (NPS 2015).

One of three NPS golf courses in the DC area, Rock Creek Park Golf Course has undergone various modifications and improvements in the decades since its opening. Famed golf course architect, William S. Flynn, designed the course in the parklands style on the partially wooded sloping topography of Rock Creek Park (NPS 2019a). In the 1960s, the National Park Service (NPS) built a new clubhouse as part of its Mission 66 initiative for Rock Creek Park and in 1991, the golf course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District (NPS 2019a). Today, the golf course retains much of its integrity of location, historic design, setting, materials, workmanship, feeling, and association but is experiencing numerous management challenges. These include overgrown, encroaching vegetation that has narrowed the fairways and decreased playability; a lack of clear pathways for pedestrians and golf carts; the lack of a driving range; the deterioration of turf grass throughout the course; and limited facilities to accommodate golf course operations, golfers, and non-golfers. The plan is needed to address these issues.

In 2020, the NPS signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate Rock Creek Park Golf Course. The purpose of this project, as proposed by the NLT and subject to NPS approval, is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

This Environmental Assessment (EA) evaluates two alternatives: the no-action alternative and the proposed action (the golf course rehabilitation). Under the no-action alternative, Rock Creek Park Golf Course would continue to operate in its current condition, with improvements on an as-needed basis. Under the proposed action, the Rock Creek Park Golf Course would be rehabilitated in a manner consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report. The primary components would include rehabilitation of the golf course itself, rehabilitation of the golf course entrance, and new clubhouse, golf cart building, picnic pavilion, driving range and maintenance facility.

This EA analyzes the potential impacts these alternatives would have on the natural, historic, and human environment. This EA has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended (42 United States Code [USC] 4332[2] [C]); the implementing regulations of

the Council on Environmental Quality (40 Code of Federal Regulations [CFR] 1500-1508); the Department of the Interior NEPA regulations (43 CFR Part 46); and NPS Director's Order #12: *Conservation Planning, Environmental Impact Analysis and Decision-Making* (NPS 2011) and the accompanying NEPA Handbook (NPS 2015).

Note to Reviewers and Respondents:

This EA will be on formal public and agency review for 30 days from the release date. If you wish to comment, please provide comments on the NPS Planning, Environment & Public Comment (PEPC) website at <https://parkplanning.nps.gov/rockcreekgolfplan> or by mailing to the name and address below. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Superintendent
RE: Golf Course Rehabilitation
Rock Creek Park
3545 Williamsburg Ln NW
Washington, DC 20008

CONTENTS

Contents..... iii
List of Figures iv
List of Tables..... iv
Chapter 1: Purpose and Need 1
 Introduction 1
 Project Area Location and Description..... 2
 Purpose of and Need for Action 5
 Issues and Impact Topics Retained for Detailed Analysis..... 6
 Impact Topics Dismissed from Further Analysis 7
Chapter 2: Alternatives..... 11
 Alternative 1: No Action 11
 Alternative 2: Proposed Action (Preferred Alternative) 13
 Alternatives Dismissed from Further Consideration 27
 Rationale for the Preferred Alternative..... 31
Chapter 3: Affected Environment and Environmental Consequences 32
 Methodology for Analyzing Impacts 32
 Cultural Landscape and Historic District..... 34
 Vegetation..... 40
 Wildlife and Wildlife Habitat 48
 Visitor Use and Experience 53
 Adjacent Communities 56
Chapter 4: Consultation and Coordination 61
 Public involvement 61
 Agency Consultation and Coordination..... 61
 Public Review..... 63
References 64
Appendix A A-1
Appendix B B-1

LIST OF FIGURES

Figure 1. Project Vicinity and Lease Boundary	2
Figure 2. Site Layout.....	4
Figure 3. Existing Site Plan	12
Figure 4. Overall Proposed Site Plan for the Rehabilitation of Rock Creek Park Golf Course.....	14
Figure 5. Planting Zones	18
Figure 6. Exterior Site Lighting Plan.....	20
Figure 7. Exterior Golf Course Lighting Plan.....	20
Figure 8. Parking and Bike Access	21
Figure 9. Proposed Clubhouse, Driving Range, Pavilion, and Vicinity of Clubhouse	23
Figure 10. Proposed Clubhouse Design (West Elevation).....	23
Figure 11. Driving Range and Cart Storage Elevations.....	24
Figure 12. Proposed Maintenance Building Location.....	25
Figure 13. Maintenance Building Proposed Materials and Design.....	25
Figure 14. Locations Considered for Maintenance Facility.....	28
Figure 15. Early Layout of Ecological Trail and Other Paths.....	29
Figure 16. Locations Considered for Irrigation Pond	30
Figure 17. Extent of Existing Forested Areas in Comparison to the 1927 Flynn Plan	41
Figure 18. Forest Stands	42
Figure 19. Clearing Plan by Forest Stand	46

LIST OF TABLES

Table 1. Rock Creek Park Golf Course Character-Defining Features	37
Table 2. Forest Stand Conditions.....	41
Table 3. Forest Stand Impacts.....	45

CHAPTER 1: PURPOSE AND NEED

INTRODUCTION

The National Park Service (NPS), in cooperation with National Links Trust (NLT) and the National Capital Planning Commission (NCPC), has developed this Environmental Assessment (EA) to rehabilitate Rock Creek Park Golf Course in Washington, D.C. by addressing deferred maintenance, increasing playability, broadening course appeal to the local community, and achieving financial stability for the operation of the course. The golf course is set within Rock Creek Park, a unit of the national park system administered by the NPS.

The nearly 1,800-acre Rock Creek Park is one of the oldest and largest natural urban parks of the national park system. It came about because of the 19th-century conservation movement to preserve natural scenic areas. Established by Congress on September 27, 1890 (26 Stat 492), Rock Creek Park's location makes it highly accessible for city residents and visitors to experience a tranquil natural setting or pursue many recreational activities. Stretching from the Maryland state line to the National Zoo, Rock Creek Park exists as a green oasis amidst the dense urban development of the Washington, D.C., metropolitan area. Its location makes it highly accessible for city residents and visitors alike to experience a tranquil natural setting for its own sake or in pursuit of any number of recreational activities. As stated in the enabling legislation, Rock Creek Park is "perpetually dedicated and set apart as a public park or pleasure ground for the benefit and enjoyment of the people of the United States," which included the construction of driving roads and trails for horses and pedestrians, while preserving the park's "timber, animals, and curiosities . . . in their natural condition, as nearly as possible."

One of three NPS golf courses in the DC area, Rock Creek Park Golf Course opened in 1923 and has undergone various modifications and improvements in the decades since its opening. Expanding to an 18-hole course in 1927, famed golf course architect, William S. Flynn, designed the course in the parklands style on the partially wooded sloping topography of Rock Creek Park (NPS 2019a). In the 1960s, the NPS built a new clubhouse as part of its Mission 66 initiative for Rock Creek Park and in 1991, the golf course was listed in the National Register of Historic Places (National Register) as a contributing resource to the Rock Creek Park Historic District (the historic district) (NPS 2019a).

Today, the golf course retains much of its integrity of location, historic design, setting, materials, workmanship, feeling, and association but is experiencing numerous management challenges. These include overgrown, encroaching vegetation that has narrowed the fairways and decreased playability; a lack of clear pathways for pedestrians and golf carts; the lack of a driving range; the deterioration of turf grass throughout the course; and limited facilities to accommodate golf course operations, golfers, and non-golfers. The plan is needed to address these issues.

In 2020, the NPS signed a 50-year lease with NLT, a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including Rock Creek Park Golf Course. NLT will provide long-term care to these historic courses and affordable opportunities to golf in the nation's capital. NLT's plans, which would be implemented over the next several years, would substantially benefit both golfers and the surrounding communities. Part of NLT's goals for the golf course rehabilitation would be historic preservation, reviving exemplary golf course architecture, environmental sustainability, growing golf participation via non-traditional golf options, and expanding non-golf community infrastructure and programming.

This EA considers two alternatives: the no-action alternative and the proposed action (the golf course rehabilitation). Under the no-action alternative, NLT would continue to operate the golf course and make improvements and repairs on an as-needed basis. The routing of the course and circulation would remain the same, and the clubhouse and maintenance building would remain in their current condition. Under the proposed action, the Rock Creek Park Golf Course would be rehabilitated in a manner consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report. The primary components would include rehabilitation of the golf course itself, rehabilitation of the golf course entrance, and new clubhouse, golf cart building, picnic pavilion, driving range, and maintenance facility.

The project area location is shown on figure 1. These alternatives are further described in detail in “Chapter 2: Alternatives.”

The NPS has prepared this EA to assess the potential environmental impacts of implementing the Rock Creek Park Golf Course Rehabilitation in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended (42 United States Code [USC] 4332[2] [C]); the implementing regulations of the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations [CFR] 1500-1508); the Department of the Interior NEPA regulations (43 CFR Part 46); and NPS Director’s Order #12: *Conservation Planning, Environmental Impact Analysis and Decision-Making* (NPS 2011) and the accompanying NEPA Handbook (NPS 2015).

PROJECT AREA LOCATION AND DESCRIPTION

The project area is Rock Creek Park Golf Course which is located within the northeast corner of Rock Creek Park, just east of Rock Creek in northern Washington, D.C. It is located at the intersection of 16th Street NW and Joyce Road NW. The course occupies approximately 100 acres. See figure 1 below for a map of the project vicinity and lease boundary. The project area for this project is the area encompassed by the lease boundary.

Figure 1. Project Vicinity and Lease Boundary



This project area encompasses a 14-hole course (four holes of the original back nine are currently not in play). The front nine holes are characterized by visually open spaces, gentle slopes, and wide fairways. The back five holes are characterized by narrow fairways, dense forest stands, and steep slopes. The property includes two buildings: the clubhouse and a maintenance building. The existing clubhouse was built in 1964 in the NPS Mission 66 style and is a contributing resource to the Rock Creek Park Historic District. The clubhouse is located in the eastern half of the project area and is the center of the counterclockwise progression of play for the course. The maintenance building is located in the southern portion of the course and is highly visible to golf course users. Various paths and trails are located throughout the project area. This includes ill-defined cart paths used by pedestrians, golf carts, and maintenance vehicles. See figure 2 below for a map of the existing site layout.

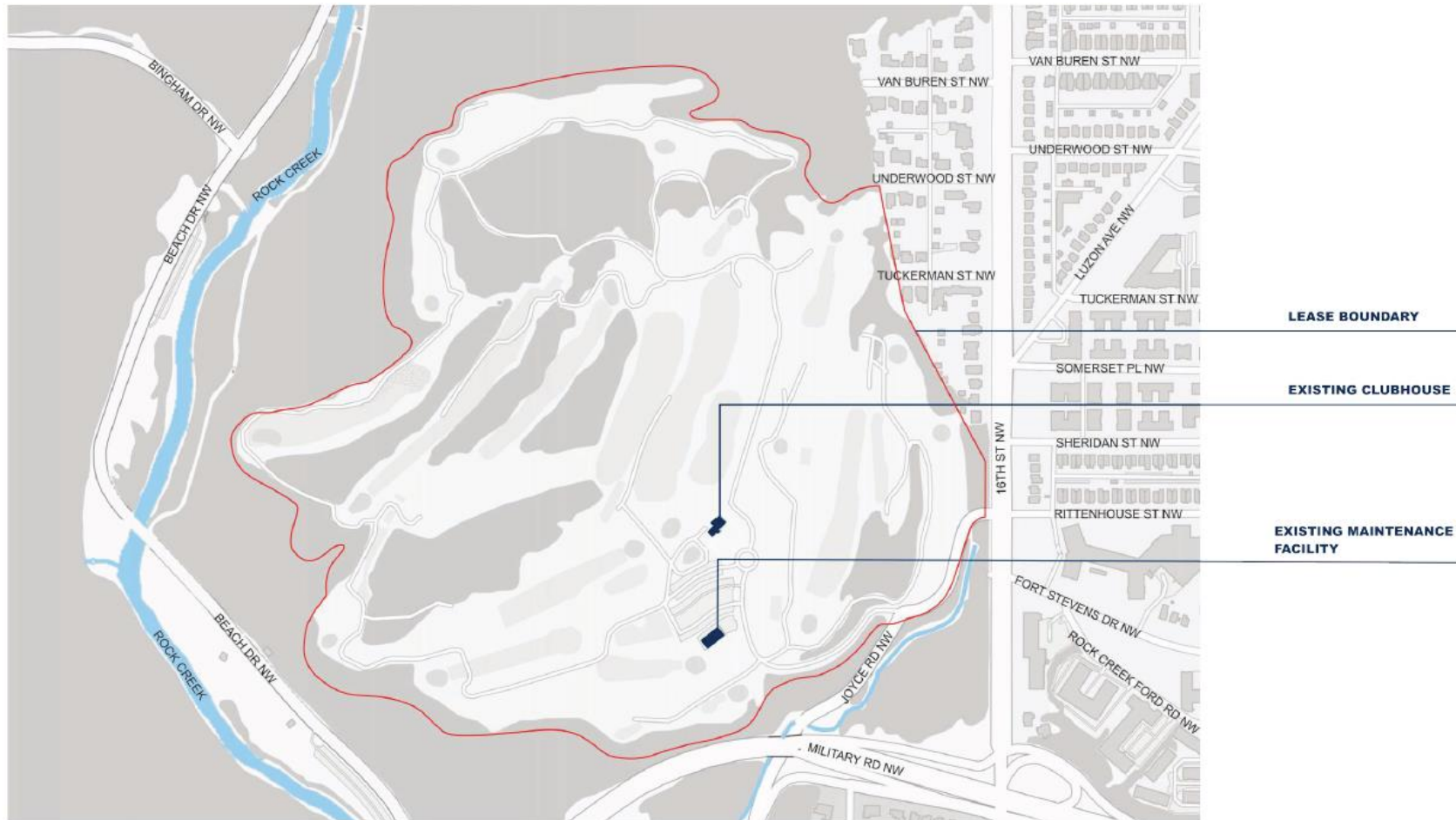


View of deteriorated asphalt and worn grass cart path



View of the front and northeast side of the Mission 66-era clubhouse

Figure 2. Site Layout



PURPOSE OF AND NEED FOR ACTION

The purpose of the EA is to develop a strategy to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of the Rock Creek Park Golf Course. This plan will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The plan is needed to address the following issues:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Turfgrass is deteriorated due to traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on historic viewsheds and playing areas; and
- The maintenance facility is in a highly visible location, detracting from the cultural landscape, and does not meet the needs of golf course operations.



View of invasive species overgrowth



View of worn turf between the ninth and tenth holes

ISSUES AND IMPACT TOPICS RETAINED FOR DETAILED ANALYSIS

During the planning process, the NPS identified specific impact topics as critical to this project area. Impact topics are a means of organizing the discussion of issues and analysis of impacts. In the context of NEPA reviews, issues can be problems, concerns, conflicts, obstacles, or benefits that would result if the proposed action or alternatives, including the no-action alternative, are implemented. During the scoping process, impact topics were either retained for further analysis or dismissed from further consideration. This section provides an overview of the impact topics that were retained for analysis. A topic was retained for analysis if it met one or more of the following conditions:

- the environmental impacts associated with the issue are central to the proposal or of critical importance;
- a detailed analysis of environmental impacts related to the issue is necessary to make a reasoned choice between alternatives;
- the environmental impacts associated with the issue are a big point of contention among the public or other agencies; or
- there are potentially significant impacts to resources associated with the issue.

Cultural Landscape and Historic Structure - Rock Creek Park Golf Course was listed in the National Register in 1991 as a contributing resource to the Rock Creek Park Historic District (#91001524). Additionally, a 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register. The proposed action has the potential to rehabilitate some of the features of the site while also having an adverse effect on some other elements. The potential impacts to the cultural landscape and historic structure are described in detail in chapter 3, in the “Cultural Landscape and Historic District” section.

Vegetation - While the style of the Rock Creek Park Golf Course was meant to be evocative of a parkland setting (which includes both forest stands [with understory] and trees without understory), the vegetation of the forest stands has encroached upon the golf course, making it too challenging for many players and allowing many non-native and invasive species to take hold and spread. This has erased any indication of the intended parkland style and the forest encroachment has also created challenging conditions for turf management. Under the proposed action, NLT would remove portions of the existing forest stands to refine the areas needed for the proposed course rehabilitation while also protecting many individual trees. The potential impacts to vegetation are described in detail in chapter 3, in the “Vegetation” section.

Wildlife and Wildlife Habitat - The park protects a natural landscape consisting of deciduous forests and meadows, which provide habitat for many plant and animal species, including fish, amphibians, mammals, and more than 180 species of birds (NPS 2015). Under the proposed action, selective tree clearing would take place, an ecological trail would be added, and a pollinator meadow would be established. These actions would result in changes to some habitats within the golf course. The potential impacts to wildlife and wildlife habitat, including rare, threatened, and endangered species, are described in chapter 3, in the “Wildlife and Wildlife Habitat” section.

Visitor Use and Experience - The existing conditions at the Rock Creek Park Golf Course appeal to a narrow range of golfers and offer limited accommodations for non-golfers who may wish to experience the natural aspects of the area. Under the proposed action, the revised golf course layout and added facilities would provide visitors (golfers and non-golfers) with improved experiences. The potential

impacts to visitor use and experience are described in detail in chapter 3, in the “Visitor Use and Experience” section.

Adjacent Communities - Rock Creek Park Golf Course borders residential neighborhoods to the east. Some neighbors may use the golf course for a readily accessible recreational opportunity, and some may simply enjoy the relatively quiet and natural setting it provides. The proposed action would result in some additions to the amenities available to the neighbors and may subtly affect some elements of the neighborhood character. The potential impacts to adjacent communities are described in chapter 3, in the “Adjacent Communities” section.

IMPACT TOPICS DISMISSED FROM FURTHER ANALYSIS

The NPS has dismissed the following issues and associated impact topics from detailed analysis for the reasons provided. An impact topic was initially considered but dismissed from detailed analysis if it did not contribute to the factors outlined above.

Archeology - A 2023 archeological investigation identified one site, the J. Pilling Farm Site (Site 51NW****), in the northeastern part of the golf course. Based on Phase I archeological study, the site is considered potentially eligible for listing in the NRHP. At a meeting held on March 9, 2023, involving the NPS and NLT, it was agreed that impacts to the site would be avoided by redesign of the improvements planned for this location, such as a new trail. No excavation would be carried out in this area, and all new features would be constructed using fill soils only; this would avoid disturbance of archeological deposits. This approach avoids an adverse effect to this resource.

Additionally, a 2002-2006 survey recorded two archeological sites near the southwestern corner of the golf course associated with the J. Hoyle Farm, Site 51NW166 and the Cowden Ravine Site, 51NW188. Site 51NW166 is outside the lease boundary. The Cowden Ravine Site (51NW188) may be associated with a small structure shown in the bottom of the ravine on both the Hodasovich 1864 and 1892 USCGS Maps. During the 2022-2023 Phase IB archeological survey, several artifacts were found in the general vicinity of the J. Hoyle Farm. These finds may have derived from the J. Hoyle Farm, although they could also date to more recent times. However, most shovel tests in this area were negative, and two close-interval shovel tests failed to produce additional material. The center of the J. Hoyle Farm is outside the lease boundary, and the artifacts within the lease boundary do not represent potentially significant components of the site. The projected location of the structure in the ravine is also not within the lease boundary.

Furthermore, the Memorandum of Agreement (MOA) among the NPS, District of Columbia Historic Preservation Officer (DC HPO), and the NCPC will include archeology stipulations designed to protect such resources. For these reasons, the proposed action is not expected to affect these sites. Therefore, the NPS has dismissed archeology from further analysis.

Wetlands and Waters of the US - There are a few wetland areas within the lease boundary for the golf course. These areas are extremely important to local wildlife (especially amphibians). Due to the important natural functions and values of these areas, the proposed action incorporates efforts to avoid these areas and incorporate measures to improve protection of them.

There is a wetland between the existing 17th and 18th holes, fed by a stream crossing fairway 17. Predating the construction of the golf course, the stream is one of two originally documented in 1921. The stream flows south and west towards Rock Creek. The feature is located in a valley that bisects hole 17. A seasonally occurring wetland is associated with the stream and is an important breeding habitat for park wildlife.

Maintenance in and around the pond is minimal and is limited to the physical removal of non-native invasive species adjacent to the pond; no mechanized equipment is permitted in this area. The stream crossing the 17th hole currently has maintained turf adjacent to the stream course; however, NLT may reevaluate this maintenance approach under the no-action alternative. Under both the no-action and proposed action alternatives, this area would remain a functioning golf course which entails the maintenance of turf areas. Runoff on the existing course would be more impactful to water sources than under the proposed action, which would provide a more fully vegetated course. A more fully vegetated landscape would improve absorption of runoff, reducing the amount of sediment (and any fertilizer or pesticides that may be in use) that enters wetlands and streams.

Under the proposed action, the stream would bisect the proposed second hole of the short course (which is part of the existing 17th hole of the course). As such, a bridge approximately 15 feet wide would be installed over the stream as part of the cart path route. The bridge would be approximately 30 feet long so that landings could be located in upland areas where the minimal construction needed to install them would not have any noticeable impacts to the functions and values of the stream, much less the downstream wetland areas. The pond in this location was initially created by the existing cart path crossing and a human-created dam. Additional human-created wooden check dams also exist across the 17th hole but have deteriorated over time and no longer function. This has led to erosion issues across the hole corridor and into the woods. Under the proposed action, NLT would work with NPS to address erosion issues. Furthermore, NLT would add approximately half an acre of plantings specifically meant to provide riparian buffering of runoff on the adjacent slopes of this wetland crossing to provide natural protection of this resource from runoff and to discourage visitors from using this area.

There is also a vernal pond at the edge of the contiguous forest associated with Rock Creek Park, on the northern side of the closed 14th hole, near the proposed fifth and sixth holes of the short course. This area would be avoided during construction of the proposed holes.

Due to the lack of impacts expected to wetlands and waters of the US associated with the proposed action, the NPS dismissed this topic from further analysis.

Water Quality and Quantity - The golf course is located within the Rock Creek watershed, and NLT currently uses municipal water to irrigate the course. Under the no-action alternative, NLT would make as-needed improvements to vegetation or paving to reduce erosion associated localized bare patches of soil. The proposed action would include substantial ground disturbance and new impervious surfaces, all of which would be subject to approved erosion control and stormwater management plans. NLT would also make efforts to reuse stormwater runoff to irrigate the course. For irrigation purposes, NLT would capture the runoff from the roof at the clubhouse and driving range, storing it in a cistern under the cart barn. NLT also proposes to create an irrigation pond. The pond would be installed near the northern boundary of the course within the pollinator meadow area.

NLT is also evaluating the feasibility of installing a groundwater well on site as part of the proposed action. If this proposal continues to move forward, it would be subject to ongoing coordination with local authorities to determine any necessary monitoring of the surrounding groundwater and seepage areas to understand the level of draw-down caused by golf course use and inform the NPS review and potential approval process for the well. NLT and the NPS would work with a hydrologist to determine testing protocols and assess potential impacts to water features in the area, including ephemeral streams, ponds, and wetlands. Implementation of testing and installation of the well would take place in coordination with NPS. NPS may also require hydrological monitoring in areas of substantial vegetation change such as those areas being converted from forest to meadow.

Due to the lack of noticeable impacts expected to water quality and quantity associated with the proposed action, this topic has been dismissed from further analysis. Should impacts exceed thresholds determined in coordination with NPS, additional compliance may be warranted.

Climate Change - Climate change refers to any significant changes in average climatic conditions (such as mean temperature, precipitation, or wind) or variability (such as seasonality and storm frequency) lasting for an extended period (decades or longer). Recent reports by the US Climate Change Science Program, the National Academy of Sciences, and the United Nations Intergovernmental Panel on Climate Change provide evidence that climate change is occurring as a result of rising greenhouse gas emissions and could accelerate in the coming decades. While climate change is a global phenomenon, it manifests differently depending on regional and local factors. General changes that are expected to occur in the future as a result of climate change include hotter, drier summers; warmer winters; warmer water; higher ocean levels; more severe wildfires; degraded air quality, heavier downpours and flooding, and increased drought. Climate change is a far-reaching, long-term issue that could affect the park, its resources, visitors, and management. Although some effects of climate change are considered known or likely to occur, many potential impacts are unknown. Much depends on the rate at which the temperature continues to rise and whether global emissions of greenhouse gases can be reduced or mitigated. Climate change science is a rapidly advancing field and new information is being collected and released continually.

Under the proposed action, the construction of the improvements proposed for the golf course rehabilitation would temporarily (for the months during which construction takes place) contribute to greenhouse gas emissions. Following the establishment of the revised course, operations are not expected to represent an increase in contributions of greenhouse gas emissions compared to the no-action alternative, even assuming slightly expanded hours of and seasonal operation. Rather, the new golf course infrastructure and vegetation improvements would maximize the turf's and soil's ability to sequester carbon by optimizing growing conditions for both vegetation and soil microbiology. In addition, solar panels would be installed on the driving range structure, which would reduce the electric load from the city and eliminate the need for natural gas lines on site. Furthermore, golf carts, range bay heaters, and kitchen elements at the clubhouse would also be electric. Effects to climate change from the anticipated golf course rehabilitation would not be discernible at a regional scale.

The description above captures the way the proposed action may affect climate change (specifically ways in which it may emit or sequester greenhouse gases). The ways in which climate change may affect the resources analyzed in this document are described under the affected environment section for each topic in chapter 3, in the "Environmental Trends" sections (where applicable).

Environmental Justice - Presidential Executive Order 12898, General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, and Executive Order 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All, requires all federal agencies to incorporate environmental justice into their missions by identifying, analyzing, and addressing disproportionate and adverse human health and environmental effects (including risks) and hazards of federal activities, including those related to climate change and cumulative impacts of environmental and other burdens on communities with environmental justice concerns.

According to the EPA, environmental justice is the:

"...fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations and policies. Fair treatment means no group of people should

bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.”

The project area is the Rock Creek Park Golf Course, and the proposed action would affect resources limited to those within the golf course. In addition, NLT intends to keep play affordable for local residents by focusing on three key approaches:

1. NLT would maintain costs at a level comparable to or below equivalent public golf courses nationally and in the local area.
2. The short course option, which is typically where beginners (especially young players) learn and grow into the game, would be among the lowest-cost options for golf in the region.
3. NLT would employ strategies to mitigate cost as a barrier to play by focusing on price schedules and discount opportunities. This may include dynamic pricing, youth/student pricing, senior pricing, school and seasonal passes, veterans’ and active duty military discounts, special pricing for the disabled, and frequent player discounts.

Because there are no residences or communities within the golf course boundary, and because NLT is committed to keeping play affordable for local residents, environmental justice is dismissed as an impact topic.

CHAPTER 2: ALTERNATIVES

This section of the EA describes the no-action alternative and the proposed action for the Rock Creek Golf Course Rehabilitation. CEQ regulations for implementation of the NEPA process call for the alternatives considered in a document to include a no-action alternative. The description and evaluation of this alternative provides a baseline to which action alternatives can be compared. This EA evaluates two alternatives: “Alternative 1: No Action” and “Alternative 2: Proposed Action.” The elements of these alternatives are described in the following sections. Impacts associated with the alternatives are described in “Chapter 3: Affected Environment and Environmental Consequences.”

ALTERNATIVE 1: NO ACTION

Under the no-action alternative, NLT would continue to operate the Rock Creek Park Golf Course for the remaining duration of its existing 50-year lease. The golf course would remain generally in its current configuration as shown on the existing site plan (figure 3). Isolated repairs and improvements would be made on an as-needed basis. The golf course would provide facilities necessary for operating and managing the golf course. These would continue to provide little accommodation for non-golfers and other guests, lacking features such as a pavilion area, expanded clubhouse, programming space, etc. There would be no driving range at the course.

The routing of the course would remain in its current configuration with 18 holes, 14 of which are open for play, while the other 4 on the back 9 are closed due to tree encroachment and poor turf conditions. The back holes exist in wooded corridors on steep hillsides with dramatic topography (NPS 2019a). Historically, the front nine holes were placed on generously sloping topography in visually open spaces with limited trees (NPS 2019a). However, following the 1958 expansion of Military Road NW, the front nine-hole configuration was compressed into the space of the original six holes, shortening this part of the course.

Visitors to the golf course would continue to use Joyce Road NW and Golf Course Access Road NW, both approximately 20 feet wide, with no separate accommodations for those entering on foot or by bicycle. Beyond the entry road and parking lot, cart paths currently handle all circulation through the golf course, including golfers on foot or in carts, non-golfers, and maintenance vehicles. There are approximately two miles of cart paths located throughout the course. The cart paths are, on average, four feet wide and comprise a base mixture of gravel, partial paving, and dirt. Under the no-action alternative, the cart paths would remain ill-defined and continue to be used by both golfers and non-golfers.

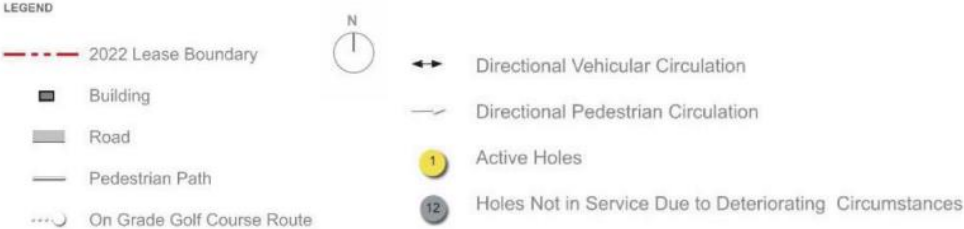
Vegetation would be maintained on an as-needed basis with a focus on non-native invasive plant species management and preventing forest vegetation from further encroaching on the remaining holes. The existing forest stands may continue to shade out turf grass in some areas, causing some areas of bare dirt. The course would continue to be irrigated using municipal water exclusively. The current irrigation system would continue to be inadequate for generation of golf turf, requiring manual operation and ineffective if attempting to use more than one sprinkler at a time. A labor-intensive hand watering system would continue to be used to maintain turf grasses. Some modest repairs to sprinkler heads and valves may take place under the no-action alternative.

The clubhouse would remain in its current condition. It offers modest retail space, restrooms, and some storage space. The parking lot would remain at its current size and configuration, with parking for 125 cars.

The maintenance facility would remain prominently placed next to the golf course parking lot in a highly visible location within the cultural landscape. It would remain at its current size, which is insufficient for

a modern golf course maintenance operation because it lacks adequate space to store maintenance equipment, golf carts, and dumpsters, as well as commonly used aggregates such as sand, soil, and gravel. The current facility has no infrastructure to support the safe handling and storage of pesticides or to perform equipment repairs. The current building also lacks a HVAC system and water.

Figure 3. Existing Site Plan



ALTERNATIVE 2: PROPOSED ACTION (PREFERRED ALTERNATIVE)

Under the proposed action, the Rock Creek Park Golf Course would be rehabilitated, focusing on the following primary elements, which are each described in more detail following this summary:

Golf Course Rehabilitation

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn’s parkland-style course as well as Flynn’s more open front 9 and more wooded back 9, and incorporates many of Flynn’s original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn’s original greens
- Construction of a practice putting green and short game area
- Removal of trees in specific areas to widen fairways and accommodate the new golf course routing
- Removal of non-native invasive plant species
- Addition of new cart paths to improve accessibility
- Establishment of native pollinator meadow habitat and native grass areas on abandoned golf course holes
- Establishment of a publicly accessible ecological trail in the golf course
- Installation of a water distribution and irrigation system, as needed, to support improved golf course operations
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime¹ use in limited areas such as the practice green, short game area, and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, parking lot, and clubhouse landscaping
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Building

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Figure 4 below shows the proposed elements laid out on a map of the golf course. Additional detail about each of the primary elements is provided below.

¹ Golf course operation may extend to 10pm, although actual hours of operation would be subject to ongoing coordination with NPS.

Figure 4. Overall Proposed Site Plan for the Rehabilitation of Rock Creek Park Golf Course



Golf Course Rehabilitation

These sections focus on the rehabilitation of the landscape comprising the Rock Creek Park Golf Course, including the routing of the course, vegetation, cart paths and trails, irrigation, and lighting.

Golf Course Routing

Rock Creek Park Golf Course is located along a densely populated commuter corridor, providing easy access for after-work and weekend golf enthusiasts, as well as junior golfers in the region. The proposed project would include a 9-hole regulation course and a shorter 9-hole par-3 course, broadening the appeal of the facility to both experienced and beginner golfers. The proposed 9-hole regulation course would measure approximately 3,285 yards and use corridors from both Flynn's more open front 9 and more wooded back 9. Taking advantage of the natural bowl-like topography, the proposed driving range would stand on what is now the 9th and 10th holes with the line of play up the hill to the north (similar to the line of play of the current tenth hole). A proposed 9-hole par-3 course measuring approximately 1,205 yards would start and finish just west of the current 9th green.

The order of play, or routing, of the proposed 9-hole regulation course would allow golfers to continue to experience both the more open farmland that characterizes the front 9 at the Rock Creek Park Golf Course and the wooded, hilly parkland feel of the back 9 as designed by William Flynn. Like the Flynn course, the proposed 9-hole regulation course would start and end at the clubhouse with a counterclockwise progression of play.

The first 5 holes of the proposed 9-hole regulation course would occupy the area that is currently the course's first 8 holes. The final four holes of the proposed 9-hole regulation course would occupy the area that is currently the 11th hole, the 15th hole, the 17th hole, and the 18th hole. Like Flynn's original design, the proposed course would have few sand bunkers and the routing would take advantage of the natural topography of the site, with long, expansive views.

The proposed 9-hole par-3 course would start and end at the clubhouse and occupy the southwestern portion of the golf course, using many of the corridors of the original back 9 holes, including the 14th and 16th holes. Holes would range from 100 to 180 yards. Some grading of the existing golf course would be required to establish the proposed layout focused on the locations of new tees and greens. Up to approximately 32 acres of the golf course would potentially be subject to some amount of grading. Most grading (approximately 94% of the area potentially subject to grading) can be categorized as "finish grading," which would involve small changes to the existing topography necessary for the construction of standard golf course features (such as greens, tees, and bunkers). Approximately 2.1 acres of the golf course (about 6% of the total area potentially subject to grading) would involve more substantial grading work. Of the areas where grading may potentially exceed 2 feet, 1.35 acres involve filling on top of existing grade and .75 acres involve cutting existing grade. Almost all of the cut is concentrated in two locations on the golf course: the 5th fairway and the 7th fairway (each of which involves a maximum of 6-8 feet of cut). This is where man-made golf course features were constructed that altered the original William Flynn-design of the golf course. The grading in these areas is designed to restore a more natural topography that better represents the topography of the original Flynn golf course. The work to the 7th fairway is designed to balance cut and fill in the area, so there is a substantial amount of fill there in addition to the aforementioned cut. The rest of the grading work involving fill around the course is small in scale (less than 4 or 5 feet of fill areas around greens and tees) to support both the establishment of golf course features on the par 3 course and to create the proposed 6th and 7th tees on the regulation course.

Cart Paths

Under the proposed action, NLT would establish an improved cart path system for the golf course that removes redundancy, continues to provide maintenance vehicle access, and avoids sensitive natural areas. The cart path would be approximately 8-12 feet in width, travelling a maximum of approximately 3 miles through the course. Part of the surface would likely be asphalt, with other parts unpaved. The path would not be universally accessible due to changes in elevation throughout the course. The exact locations, total length, and materials of the cart paths would be subject to refinement as design of this element progresses and would generally adhere to Architectural Barriers Act Accessibility Standards (ABAAS).

Vegetation

Creation of the revised course described above would require specific portions of the existing forest stands to be removed. Removal of vegetation would be focused on non-native invasive plant species, some encroaching successional forest, and specific mature trees (details regarding vegetation removal are described in the “Vegetation” topic in the following chapter). Removal of mature trees would be limited to the minimum clearing needed to rehabilitate the golf course and establish the new par-3 course.

NLT, in coordination with the NPS, developed a plan to selectively remove trees that encroach on historic playing corridors and viewsheds, and those that affect playability. Specimen trees that support the historic character of the property were identified for protection and would be maintained. Before identifying a tree for removal, consideration was given to pruning, elevation of lower limbs, opening crowns and other measures that could achieve the same goals. The criteria for selection of trees for removal was based on an evaluation of the following factors:

- Overall condition of the tree
- Adverse shade impacts to turf and desired vegetation
- Adverse impact on air circulation to turf areas
- Adverse impacts from roots to turf conditions, cart paths, and other landscape features
- Trees changing original design intent from the period of significance (where forest stands are encroaching on original golf course design)
- High risk of dead limbs or entire tree causing injury or other safety concerns
- Defects due to poor tree health from insects or disease

The clearing described in this plan is the maximum anticipated extent of tree/forest removal. NPS staff would continue to work closely with NLT as tree clearing proceeds, allowing for adjustments that could result in reduced clearing.

Under the proposed action, non-native invasive plant species would be targeted for recurring control and removal as part of regular golf course management.

Meadows and Other Planting

Under the proposed action, NLT would incorporate native meadow habitat throughout the site and establish other naturalized areas, including some targeted riparian plantings associated with stream crossings. More than 19 acres of meadows and other naturalized areas would be scattered in patches throughout the rehabilitated golf course. Approximately 5 acres, mostly on the northern edge of the golf course (historically used for holes 12 and 13), would be repurposed as native meadow habitat. The plants to be seeded in these areas would be a pollinator meadow mix (those species native to the mid-Atlantic

area) and would be subject to additional coordination with the NPS and the US Fish and Wildlife Service (USFWS). Target species for the pollinator meadow would include birds, bees, and butterflies, with an emphasis on milkweed species for use by monarch butterflies. This area would be mown (at approximately 8 inches) in spring and fall in conjunction with spot treatments for non-native invasive plant species. Approximately 8 acres scattered throughout the golf course would be maintained as a native grass meadow, with a similar maintenance regimen to the pollinator meadow (limited mowing and non-native invasive species spot treatments) but with a focus on grass species. Naturalized areas and riparian buffer areas (close to 6 acres) would be in primarily out-of-play areas that are allowed to grow unimpeded during the growing season and may comprise a variety of native species and would require some spot treatments for invasive plants. This area also includes the seasonally occurring pond on the western side of the course. See figure 5 below for a map of the proposed planting zone locations.

Ecological Trail

Under the proposed action, NLT would establish an ecological trail through the golf course for non-golfers to experience the site on foot, separately from the cart path. This pedestrian trail would be an approximately 1-mile loop trail, with the trailhead at the clubhouse and offering a loop to the north and west. Approximately one-half mile of the trail, extending north from the clubhouse along the historic farm road, would be approximately 6 feet wide and use a crushed stone/gravel or paved with asphalt along the farm road and crushed stone/gravel along the remainder of the first half-mile. The remaining half-mile of trail would be approximately 5 feet wide and mowed as it loops back to the clubhouse. While some portions of the trail would be relatively steep with slopes of greater than 1:20 to follow the course's rolling topography, all materials for paved paths would be ABAAS compliant.

Irrigation

Under the proposed action, NLT would install several new facilities to provide additional sources of water for irrigation beyond the city's water system. NLT would develop a human-created, lined pond for irrigation in a natural depression in the fairway of the existing 12th hole. The irrigation pond would capture stormwater runoff within the site for irrigation purposes. NLT would also capture the runoff from the roof at the clubhouse and driving range, storing it in a cistern under the cart barn for irrigation purposes. In addition to runoff, the pond would also be filled with well water (pending approval) and filtered (to remove chloramine treatment) city water. A pump station capable of 1,000 gallons per minute would be installed near the irrigation pond. Of the 100 acres that constitute the golf course, approximately 23.6 acres would be irrigated. Each sprinkler head would be individually controlled, meaning only the heads needed would run when necessary. A computer would program the irrigation sequence which allows for a "cycle and soak" approach (water a small amount, allow to soak in, and repeat) to watering that eliminates runoff. The central computer would provide NLT with information from an onsite weather station that measures solar radiation, wind, humidity, and rainfall. This would determine the evapotranspiration rate, which is the amount of moisture that has left the turf system over a given period of time, and allows for the precise replacement of that amount through irrigation. Soil moisture monitors would allow for further accuracy refinement by giving NLT the ability to adjust based on the individual site conditions.

NLT is also evaluating the feasibility of installing a groundwater well on site as part of the proposed action. If this proposal continues to move forward, it would be subject to ongoing coordination with local and federal authorities to determine any necessary monitoring of the surrounding wetlands, seepage areas, and groundwater to understand the effect caused by golf course use. This information will be shared with the NPS during the review and potential approval process for the use of a well.

Figure 5. Planting Zones



Placement of water lines connecting the new irrigation/water collection systems would be subject to ongoing design review and avoidance of archeological resources.

Lighting

Exterior facility lighting would be limited to the clubhouse (including driving range bays and cart storage), maintenance, and parking lot areas. Fixtures would be DarkSky Approved² (i.e., certified by the International Dark-Sky Association). Lighting would be timed appropriately so that areas are only lit when open for operation and when necessary for safety. See figure 6 below for the proposed site lighting plan.

Golf course lighting would be focused only on the driving range and the practice greens near the clubhouse. The driving range lighting would be minimized to 50 yards to allow the ball tracing technology to function. This technology would allow driving range users to see the trajectory of their drive using a digital interface, which requires a minimum of 50 yards of light to track the ball. Beyond this distance, little to no lighting would be used, unlike a typical driving range. If a ball is hit beyond this distance into unlit spaces at night, the screen at each hitting bay would display the ball's trajectory. Lighting would consist of a combination of edge, pole-mounted, and roof-mounted lighting. All lighting would be timed appropriately so that areas are only lit at times when it is necessary for functionality of the course. When the course is closed, all golf course lighting would be off. While hours of operation for the rehabilitated course have not been set, the team anticipates the course closing by 10 pm, subject to ongoing coordination with the NPS. See figure 7 below for the proposed golf course lighting plan.

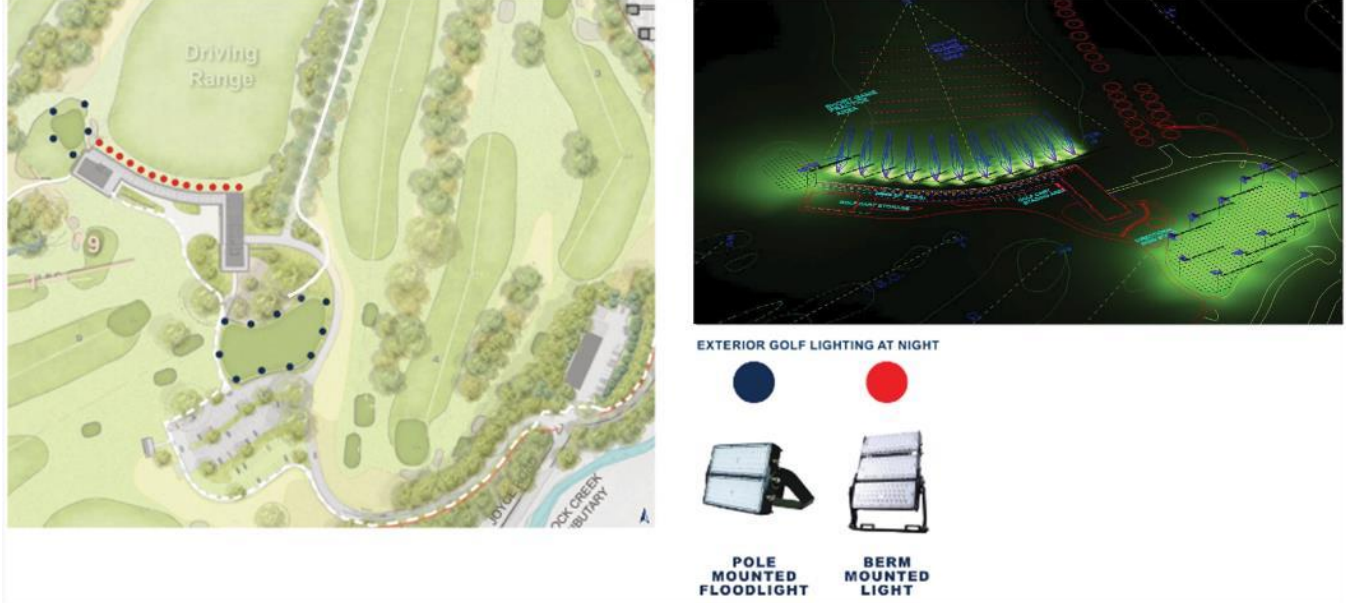
The lighting plan considers Institution of Lighting Professionals guidance for reduction of obtrusive light (GN01/21) and for bats and artificial lighting (GN08/18). Some specific mitigation measures incorporated include use of a color range (2,200K to 3,000K LED) to reduce sky glow and be less disruptive to any bats using the area, use of berm-mounted lighting, use of individual reflectors internally on every LED in each module to reduce spill light and tightly control where light is put in the environment, and use of an additional visor to help shield the face of the fitting from view and helping further control the light.

² DarkSky Approved is a program administered by the International Dark-Sky Association which provides objective, third-party certification for products, designs, and completed projects that minimize glare, reduce light trespass, and don't pollute the night sky (DarkSky International 2023).

Figure 6. Exterior Site Lighting Plan



Figure 7. Exterior Golf Course Lighting Plan



Golf Course Entrance and Clubhouse

Site Circulation and Parking

At the golf course entrance at 16th Street NW and Joyce Road NW, the proposed rehabilitation would include a new multiuse path (up to 10 feet wide, where topography allows) along Joyce Road NW and up

to the golf course to promote multimodal transportation and allow pedestrians to enter the course safely from 16th Street NW.

The proposed new parking area would remove the northernmost section of the existing lot and would retain and reconfigure the southern two sections. The new parking area would be slightly smaller than the existing parking area, providing approximately 82 parking spaces among new shade trees. The existing maintenance area would be cleared and would be available for overflow parking, providing 31 additional parking spaces. Additional overflow parking, providing 11 parking spaces, would be provided along the Golf Course Access Road NW. See figure 8 below for a site plan of the revised parking areas. Amendments to the site design, including a designated drop-off area for rideshare and the new bike/pedestrian path with bike parking, would encourage alternative transportation options. The parking area would include permeable paving to decrease stormwater runoff. Connections between the proposed clubhouse driving range, golf cart barn, the community pavilion, and the historic farm road would be fully accessible.

Figure 8. Parking and Bike Access



- 82** Main Parking Spaces
 - 42** Overflow Parking Spaces
 - 12** Staff Parking Spaces
-
- 136** Total Site Parking Spaces + **16** Bike Spaces

Clubhouse

To serve the needs of both golfers and non-golfing visitors to the park, the proposed project would demolish the existing clubhouse. It would be replaced by a new 10,400 square-foot, fully accessible, two-level clubhouse, offering a robust indoor/outdoor food and beverage operation, restrooms, a community room, indoor golf training areas, a pro shop, and support areas. In addition, the proposed clubhouse would house classrooms, program spaces, and the administrative headquarters of First Tee of Greater Washington, a golf-based youth development organization.

The proposed clubhouse would be in the vicinity of the existing clubhouse and original 19th-century clubhouse that preceded it, at the start and end of both the 9-hole regulation course and par-3 course. It would be oriented to enhance and emphasize the panoramic views from the clubhouse to the golf course, sited to preserve the mature trees that surround the existing clubhouse, and nestled into the existing topography of the site. Landscape planting around the clubhouse would include species native to the area; non-native, invasive species that are present in the area would be removed to improve the environment and provide a better visitor experience. See figure 9 below for the proposed placement of the proposed clubhouse and adjacent features.

From the main approach, the proposed clubhouse would appear as a one-story structure, with the ground level revealing itself as the grade drops away from the entrance. The design of the new clubhouse would consist of a contemporary design that is compatible with the rich historical context of Rock Creek Park. The inspiration for building's construction materials would draw from traditional forms and materials that are exhibited in structures elsewhere in Rock Creek Park including natural stone, wood timber, horizontal siding, and slate shingles. These traditional elements would be combined with large expanses of glass, steel elements, and other features to make it unmistakably modern. NLT would place window decals or bird-friendly films on select windows to make the glass more visible to birds, preventing them from mistaking it for open space. Figure 10 below shows a rendering of the proposed clubhouse materials and design.

Figure 9. Proposed Clubhouse, Driving Range, Pavilion, and Vicinity of Clubhouse

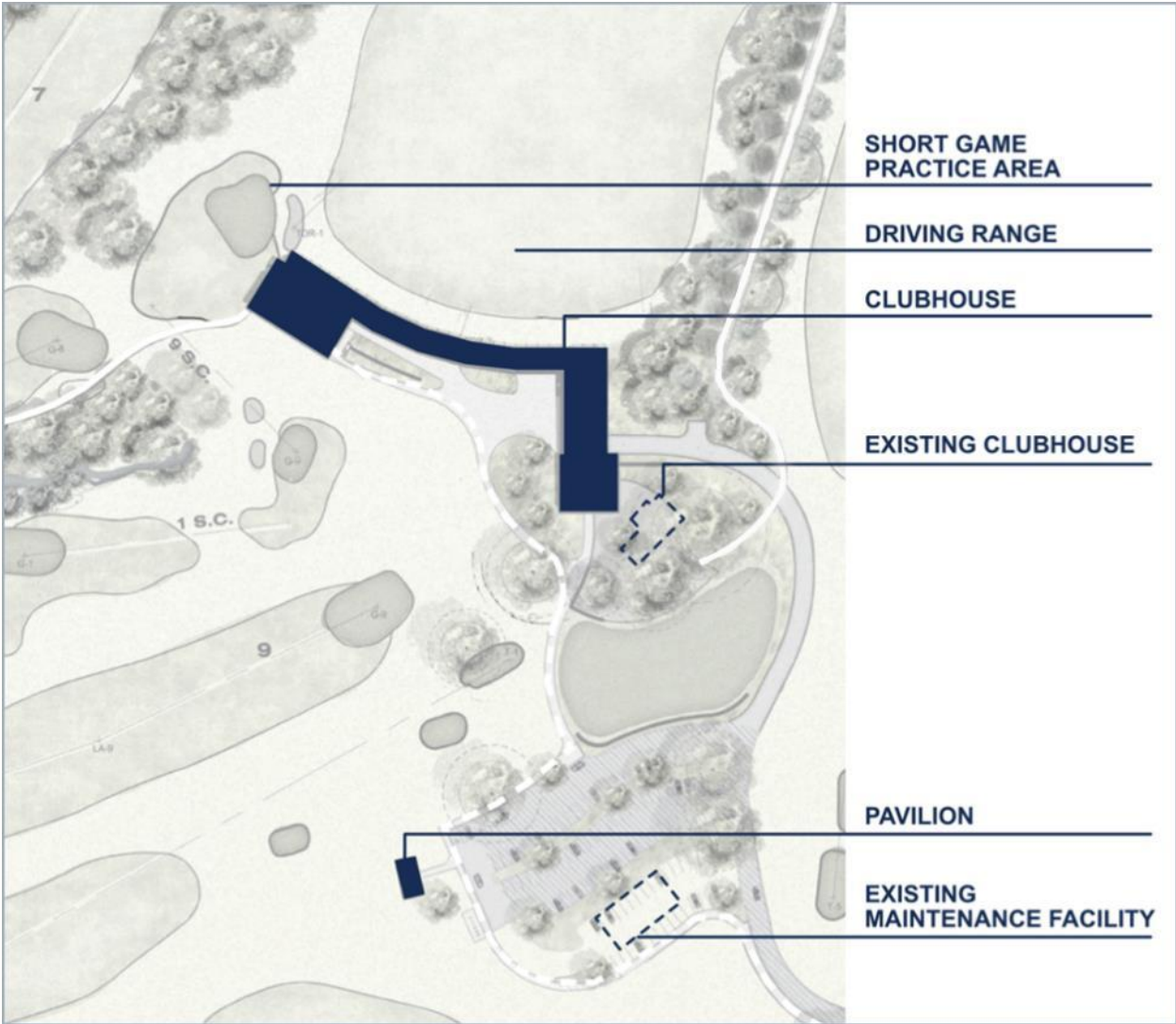


Figure 10. Proposed Clubhouse Design (West Elevation)



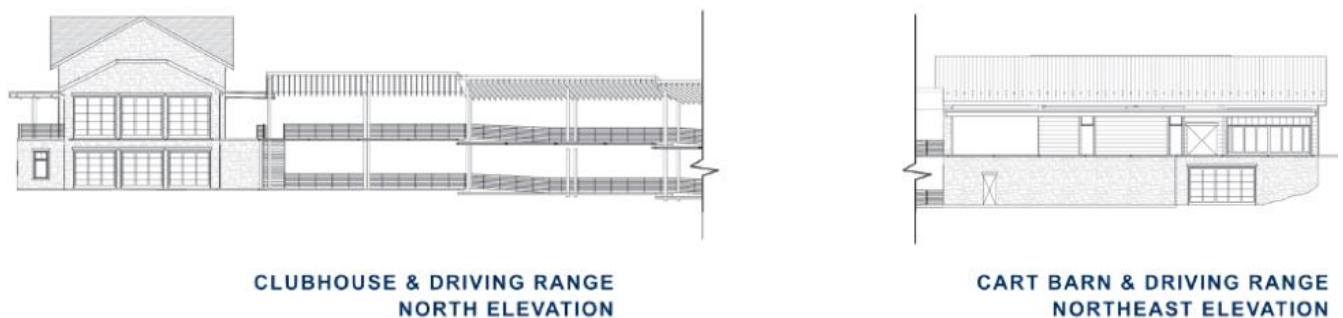
Driving Range and Cart Storage Building

The proposed two-tier driving range would occupy the space that is currently the 9th and 10th holes. The proposed range would sit within an existing basin that is already cleared of trees, so little to no tree

removal would occur with the construction of the range, and the natural topography, combined with the relatively transparent nature of the structure itself, minimizes its visual impact to the landscape. For operational efficiency, ease of food service, and to provide a continuous accessible route throughout the facility, the range structure would be connected directly to the clubhouse on each level and step down along its length following the grade of the range line.

The range would terminate on its east end with the two-story cart barn, graded similarly to the clubhouse to present as a one-story structure around most of its perimeter. The main floor of the building would include 2,700 square feet of enclosed space featuring an indoor putting green/community and event space, restrooms, and support areas, in addition to a covered, open-air porch and hitting bays. Solar panels would be installed on the roof of the structure. The ground floor would be 4,535 square feet enclosed, and would include storage for golf carts, the range picker cart, general storage, restrooms, and open-air hitting bays. See figure 11 below for drawings of the proposed driving range and cart storage.

Figure 11. Driving Range and Cart Storage Elevations



Pavilion

The proposed pavilion would stand on the west side of the parking lot and in the vicinity of the clubhouse. The one-story, open-air structure would serve as an event space for golfers and non-golfers alike. The footprint would be approximately 60 feet by 40 feet. The pavilion would use similar architectural language and materials as the clubhouse, driving range, and cart barn.

Stormwater Management

The new clubhouse, driving range tee line, golf cart storage facility, patios, and parking lot would introduce increased impervious area to the site. With these improvements in mind, modern stormwater management devices would need to be included as part of the project to ensure proper treatment of runoff from rain events. Initial review of the proposed design would necessitate the use of the following devices:

- Bioretention areas to catch and filter run off
- Bio-swales to catch and filter run off
- A modest system of properly sized storm drains to catch and divert run off around buildings and to provide outfall for the water filtered by the bioretention areas to existing drainage ways
- Cisterns to capture runoff from the roof at the clubhouse and driving range tee line

The golf course itself would not require stormwater management devices as it would continue to be maintained with complete turf coverage, meadow areas, and existing woodlands.

Maintenance Building

The existing maintenance building would be demolished. The proposed 7,500 square-foot maintenance building would stand along the west side of Joyce Road NW near its intersection with the golf course entrance road. By working with the existing topography and planting a mix of native evergreen trees, large deciduous trees, and mixed shrubs, the new building would be screened from the road and golf course. Like the pavilion, the maintenance facility would use similar architectural language and materials as the clubhouse, driving range, and cart barn. Figure 12 below shows the proposed new maintenance facility and its environs, including vegetation screening. See figure 13 for a rendering of the proposed design.

Figure 12. Proposed Maintenance Building Location

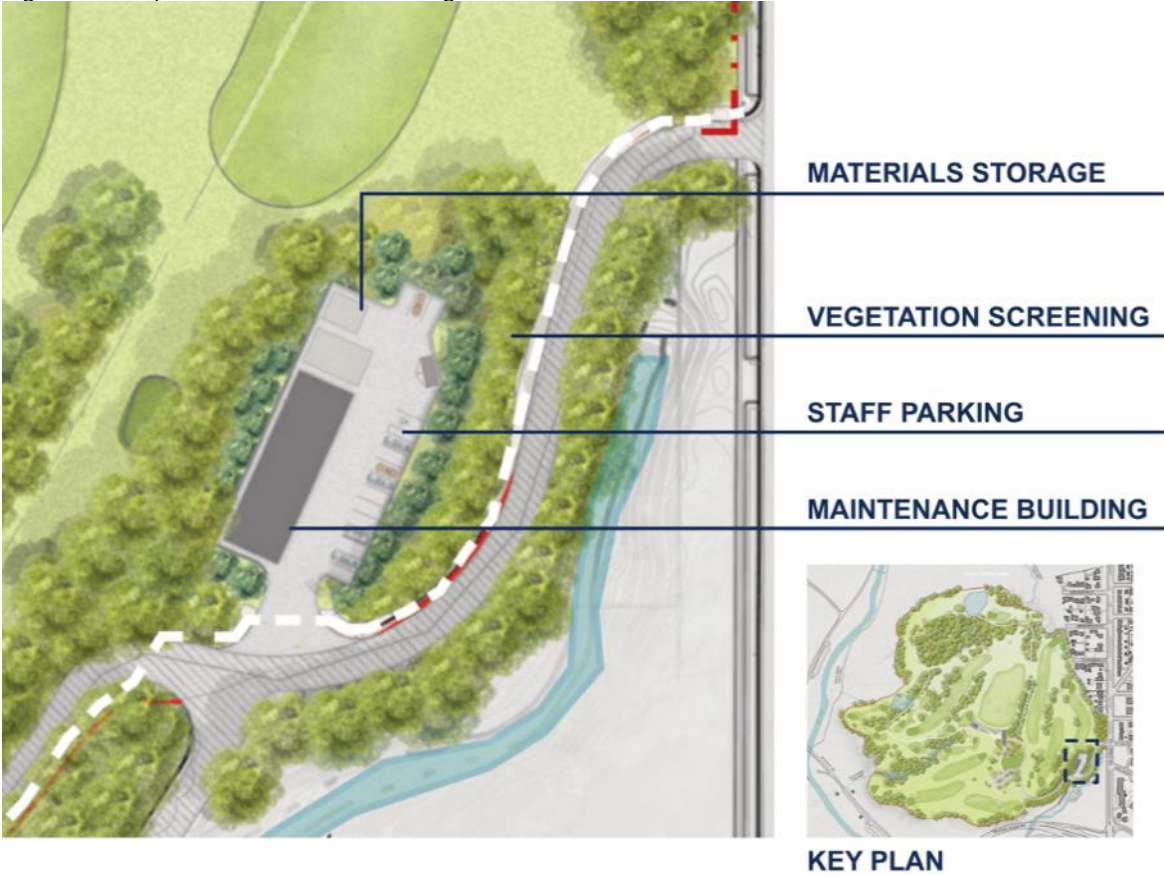


Figure 13. Maintenance Building Proposed Materials and Design



Mitigation Measures of the Proposed Action

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse impacts to affected resources, whether under the jurisdiction of the NPS or as a result of a NPS decision. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, NLT would implement the following mitigation measures. This will allow NPS to meet conservation mandates as required by the Organic Act (16 USC 1 et seq.) and as further detailed in NPS *Management Policies 2006*, and the National Historic Preservation Act (NHPA) and the Endangered Species Act (16 USC 1531 et seq.). The NPS would also implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly implemented and are achieving their intended results. Mitigation measures of the proposed action include:

- Designing glass to be avian-friendly, placing window decals or avian-friendly films on select windows, as well as taking other potential measures to make the glass less dangerous for birds, preventing them from mistaking it for open space.
- Avoiding tree removal or demolition of buildings during the active season of the northern long-eared bat, April 1 to October 31.
- Coordinating fully with NPS and consulting with USFWS on other mitigation measures to protect species newly added to the Endangered Species List.
- Developing a lighting plan that minimizes light pollution and directs light downwards. All lighting would be compliant with the DarkSky Approved program and would be turned off when not in use. The lighting plan will consider Institution of Lighting Professionals guidance for reduction of obtrusive light (GN01/21) and for bats and artificial lighting (GN08/18). Some specific mitigation measures incorporated include use of a color range (2,200K to 3,000K light-emitting diode [LED]) to reduce sky glow and be less disruptive to any bats using the area, use of berm-mounted lighting, use of individual reflectors internally on every LED in each module to reduce spill light and tightly control where light is put in the environment, and use of an additional visor to help shield the face of the fitting from view and helping further control the light.
- Using standard erosion and sediment control during grading and construction to avoid impacts to Hay's spring amphipod and wetlands.
- Distributing the pollinator meadow habitat throughout the golf course to provide a habitat corridor using meadow and forest habitat.
- Planning and implementing an invasive, non-native plant control plan well ahead of meadow planting. The plan's strategy could be adaptive, encouraging the growth of meadow plants and reduce the colonization of trees and shrubs, while maintaining year-round habitat for wildlife.
- Meadow treatment would change depending on the restoration status of the meadow. Recently planted meadows would need to be mowed on average, three times per year in order to prevent non-native invasive plant and woody growth. Mowing sessions would occur no earlier than mid-November in the fall, to a height of 6-18 inches, to provide overwintering habitat for insects. Spring mowing would occur in late March to early April, but no later than April 15, would be of a height between 3-6 inches. Also, during the spring mowing, the thatch from the mowing will be removed in order to promote germination of native vegetation.
- As climate change continues to affect monarch migration times, the NPS would consider adaptive management approaches for mowing that adhere to guidance concerning changes in migration timing. Proper maintenance treatment would involve removal of non-native invasive plants using different methodology, and further plug planting and seeding when needed. Already established meadows would be mowed only once per year in the early spring, no later than early April.

- Executing an MOA among the NPS, DC SHPO, and the NCPC that would include archeology stipulations designed to avoid and minimize adverse effects to cultural resources, such as avoiding known archeological sites. For instance, where the proposed ecological trail runs through the location of an archeological site, no excavation would be carried out in this area, and all new features would be constructed using fill soils only; this would avoid disturbance of archeological deposits.
- Adding approximately half an acre of plantings specifically meant to provide riparian buffering of runoff on the adjacent slopes of the wetland crossing near the 17th hole. This would help provide natural protection of this resource from runoff and to discourage visitors from using this area.
- Bridges proposed near the 17th hole and the 2nd hole on the short course would be designed so that landings could be located in upland areas where the minimal construction needed to install them would not have any impacts to the functions and values of the stream and downstream wetland areas.
- Avoiding a vernal pond at the edge of the contiguous forest associated with Rock Creek Park, on the northern side of the closed 14th hole, near the proposed fifth and sixth holes of the short course, during construction of the proposed holes.
- If a groundwater well is installed on site as part of the proposed action, NLT will coordinate with local authorities to determine any necessary monitoring of the surrounding groundwater and seepage areas to understand the level of draw-down caused by golf course use.
- NPS and NLT will work with a hydrologist to determine testing protocols and assess potential impacts to water features in the area, including ephemeral streams, ponds, and wetlands. NPS may also require hydrological monitoring in areas of substantial vegetation change such as those areas being converted from forest to meadow.

ALTERNATIVES DISMISSED FROM FURTHER CONSIDERATION

The proposed action as described above is the result of an iterative planning process where many other options for the design elements were considered. The proposed action moved ahead with elements that met the purpose of and needs for the project while providing context-sensitive placement and design. Specific alternative elements for which alternate design and siting was considered but dismissed from further consideration are described below.

Maintenance Facility Relocated to the Northern Portion of the Site

During the early design process, the team considered three possible locations for the maintenance facilities (labeled as A, B, and C in figure 14 below). Location A was considered as the existing location of facilities that could be redeveloped in an already disturbed area (albeit with expansion); however, the current location is highly visible as visitors enter the golf course and for anyone using the central golf course area surrounding the clubhouse. Location B was considered as one way to completely separate maintenance traffic from the main golf course entrance; however, this area has limited access for delivery trucks, is not near existing utilities, and would be in the vicinity of sensitive cultural resources. Location C will require some tree clearing and grading, but the topography would hide the facilities from golf course visitors while maximizing use of existing infrastructure and utilities. For these reasons, location C moved ahead as best meeting the purpose of and need for the project.

Figure 14. Locations Considered for Maintenance Facility



Ecological Trail Routing

The team considered alternative routings of and connections to the ecological trail. An early sketch of the trail network is shown on figure 15. The team considered a connection at Underwood Street NW but did not carry this element into design, due to potential impacts to the neighborhood from visitors who may park on public streets. A more developed network of trails weaving through the golf course forest stands and connecting to other Rock Creek Park trails was also considered, but were not carried forward due to concerns about impacts to forest health. For these reasons, the simpler loop described under the proposed action is moving forward in the design process.

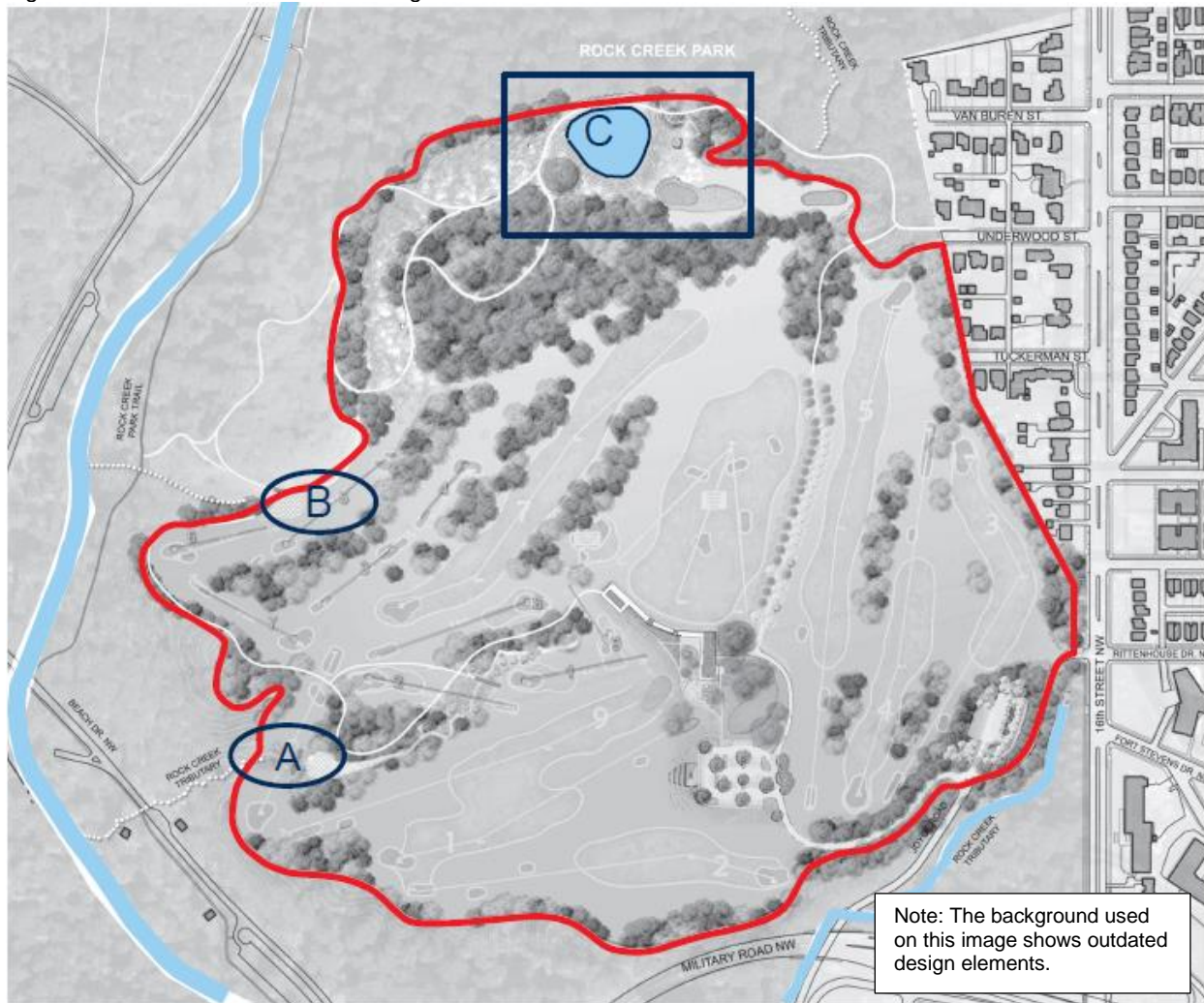
Figure 15. Early Layout of Ecological Trail and Other Paths



Alternate Irrigation Pond Location

During the early design process, the team considered three possible locations for the irrigation pond (labeled as A, B, and C in figure 16 below). The existing topography in Location A forms a natural pond basin, making it a good option for natural recharge of the pond through the existing intermittent stream. This option would provide the largest ponding area of the three options and could be an integral feature of the hole. However, this option did not move forward in later design due to the environmental sensitivity of this area, the amount of tree clearing that would be needed, the amount of fill that would be needed for the dam, and the distance from the existing utilities, which would require additional utility installation and relatively powerful pumps. Location B is also located in a broad, low swale area that would naturally receive runoff and could be integrated into several golf holes. It would require less tree clearing than location A. However, this location would also affect existing wetlands and is relatively far from existing utilities. Location C was ultimately selected because it avoided the impacts to sensitive natural resources that would have been needed for the other options. This option is located in an area where cut and fill needed to create the pond can be balanced to create storage of over 2 million gallons of water. This location is closer to existing utilities and can be integrated into the eco trail routing. For these reasons, location C moved ahead in the proposed action as best meeting the purpose of and need for the project.

Figure 16. Locations Considered for Irrigation Pond



Reuse of the Existing Clubhouse

Because the existing clubhouse is a contributing feature of the golf course, the team did consider the feasibility of its reuse during the rehabilitation effort. However, the current clubhouse does not meet the program needs for the project. It does not have adequate facilities for food service and does not have suitable space for educational and community functions. As designed, the current clubhouse does not meet the 2017 DC Building Code Chapter 11 Accessibility requirements, nor does it follow the ABAAS. The only known modification made to make the building more accessible since its construction is a wooden ramp that provides access to the rear (northwest) door of the upper floor. It is unknown if the ramp meets current accessibility requirements. There is no known accessible route to the existing restrooms, which are located on the lower floor of the clubhouse. The restrooms also do not meet accessibility requirements.

As part of the design process, NLT completed a survey and analysis of the clubhouse to determine if it could be preserved and reused with modifications or incorporated into a new design to meet program needs. The investigations indicated that the existing clubhouse is not good a candidate for reuse or integration into a larger facility due to its small size, lack of accessible facilities and routes, and extensive

use of masonry interior partitions, making any floor plan changes costly and difficult. The extent of the changes required to make the building accessible and compatible with the programmatic needs of the proposed use would substantially impact the historic integrity of the building. Consequently, NLT determined that the demolition and replacement of the existing clubhouse with a completely new facility on the site better meets the needs of golf course operation, golf course patrons, and the community.

RATIONALE FOR THE PREFERRED ALTERNATIVE

The preferred alternative is the alternative that would “would best accomplish the purpose and need of the proposed action while fulfilling [the NPS] statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors” (43 CFR 46.420(d)). The NPS has identified alternative 2, the proposed action, as the preferred alternative because alternative 2 would meet the project purpose of developing a strategy to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of the course. The preferred alternative would also fulfill the project need to address deteriorating course conditions, limited facilities, and the restoration of parts of the historic design and character of the course. Meeting the project purpose and need would further enable Rock Creek Park to meet its broader purpose of preserving “...the natural, archeological, and historic resources of the Rock Creek Valley and areas of northern Washington, DC, while providing visitors with compatible recreational opportunities and a respite within the nation’s capital” (NPS 2015).

CHAPTER 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter describes the current environmental conditions in and surrounding the Rock Creek Park Golf Course as they relate to each impact topic retained for analysis, as outlined in chapter 1. These conditions serve as a baseline for understanding the resources that could be impacted by implementing the project. Reasonably foreseeable environmental trends were determined for each impact topic (40 CFR 1502.15). This chapter then analyzes the beneficial and adverse impacts that would result from implementing any of the alternatives considered in this EA.

The Affected Environment description is followed by the Environmental Consequences analysis for each resource topic. The resource topics presented in this chapter correspond to the planning issues and concerns described in the Purpose and Need chapter of this EA.

In accordance with Council on Environmental Quality regulations, the environmental consequences analysis includes direct, indirect, and cumulative impacts (40 CFR 1502.16). The intensity of impacts is assessed in the context of the Rock Creek Park's purpose and significance, and any resource-specific context that may be applicable (40 CFR 1508.27). Where appropriate, mitigating measures for adverse impacts are described and their effect on the severity of the impact is noted. The methods used to assess impacts vary depending on the resource being considered but are generally based on a review of pertinent literature and park studies, information provided by on-site experts and other agencies, professional judgment, and park staff knowledge and insight.

METHODOLOGY FOR ANALYZING IMPACTS

In accordance with the CEQ regulations for implementation of NEPA, direct, indirect, and cumulative impacts are described under each impact topic (40 CFR 1502.16 and 40 CFR 1508.1). In considering whether the effects of the proposed action are significant, the potentially affected environment and degree of the effects of the action were analyzed (40 CFR 1501.3(b)). Where appropriate, mitigating measures for adverse impacts are also described and incorporated into the evaluation of impacts. The specific methods used to assess impacts for each resource may vary; therefore, these methodologies are described under each impact topic.

Direct impacts are caused by the action and occur at the same time and place. Indirect impacts are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable (40 CFR 1508.1[g]).

This EA also considers cumulative impacts, defined as the "effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (federal or non-federal) or person undertakes such other actions." (40 CFR 1508.1[g]). Cumulative impacts were determined for each impact topic by combining the impacts of the alternative being analyzed and other past, present, and reasonably foreseeable future actions that would also result in beneficial or adverse impacts. Projects considered in the cumulative impact analysis are briefly described below.

Cumulative Actions

Upper Beach Drive Management Plan. The Upper Beach Drive Management Plan was adopted in Fall 2022 and implements the park's decision to close portions of Beach Drive NW to through motor vehicle traffic, in favor of recreational use. Fully closed roadway sections in the park include Bingham Drive NW, Sherrill Drive NW, and three areas along Beach Drive NW: from Broad Branch Road NW to Joyce Road NW; from picnic area 10 to Wise Road NW; and from West Beach Drive NW to the Maryland state line. Between Joyce Road NW and picnic areas 6-10, Beach Drive NW would remain open to vehicles only to provide access to group picnic areas and parking lots (NPS 2022c). This plan prioritizes park access within the closed area for recreational use including walkers, runners, cyclists, and passive users such as wildlife observers and those seeking respite in natural areas (NPS 2022a). This action has the potential to affect adjacent communities.

Comprehensive Plan for the National Capital District Elements. The Comprehensive Plan's primary objective for the Rock Creek East area, which includes the Brightwood community directly adjacent to the golf course, is to conserve the existing low- and moderate-density neighborhoods, with a specific emphasis on maintaining traits such as a park-like ambiance, sense of community, family atmosphere, and open spaces (DC Office of Planning 2021a). The Comprehensive Plan also cites redevelopment plans for the former Walter Reed Army Medical Center, which closed in 2011. This area, located northeast of the golf course along Georgia Avenue NW, is being developed into a mixed-use neighborhood with the intention of becoming a major commercial and institutional employment center in the area one day (DC Office of Planning 2021a). As a result, this redevelopment is anticipated to bring new jobs, amenities, and residents to the area, which would contribute to the growth along Georgia Avenue NW. Looking forward, the Comprehensive Plan seeks to retain the residential character, appearance, and historic continuity of neighborhoods in the area east of Rock Creek Park. It also anticipates new growth in the area and notes that plans and development are strategically aimed at accommodating such growth while still conserving environmental quality, neighborhoods, and an effective transportation network (DC Office of Planning 2021a). The city's Comprehensive Plan also establishes future goals for neighborhoods to the west of the golf course. This area is particularly important for creating low- to moderate-income housing units where capacity still exists under current zoning, especially near Metro stations. Rock Creek West is an Area of High Economic Opportunity, as defined by the US Department of Housing and Urban Development. This means the area intends to preserve its existing affordable housing stock while also offering new mixed-income housing to meet the city's fair housing goals (DC Office of Planning 2021b). Rock Creek West is also known for its high prioritization of the natural environment. It includes several community gardens, trails, and more park and open space than any other planning area in the city. In the past, development on the fringes of parks has led to erosion and diminished water quality and views. For these reasons, the city is keen on preserving existing tree and slope protections for the foreseeable future (DC Office of Planning 2021b). This action has the potential to affect adjacent communities.

White-Tailed Deer Management Plan. This plan adopts a strategy to support long-term protection, preservation, and restoration of native vegetation and other natural and cultural resources at Rock Creek Park. The plan was designed to address the potential of deer becoming the dominant force in the park's ecosystem and adversely affecting native vegetation, other wildlife, and the character of the park's cultural landscapes (NPS 2011). To assess the effectiveness of the plan, the NPS monitors forest regeneration throughout the park. Long-term data show that forest regeneration has been at low levels and continues on that trend. However, the data also indicate improvements to the number of tree seedlings within the park (an indicator of regeneration) since deer management efforts have been implemented,

showing a tripling of seedlings (NPS 2022b). This action has the potential to affect the cultural landscape and historic district as well as vegetation.

CULTURAL LANDSCAPE AND HISTORIC DISTRICT

Affected Environment

Rock Creek Park Historic District

The Rock Creek Park Golf Course is currently listed in the National Register as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the National Register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, and represents the largest parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A (association with significant events), B (association with a significant person), and C (design or construction) in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the National Register nomination increased the historic district boundaries, acknowledged that the historic district meets National Register Criterion D (for information potential), and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 BCE and 1740 to 1800 CE. The 1972 end date corresponds with the construction of resources as part of the NPS Mission 66 program to improve recreational resources and facilities in park units. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

Rock Creek Park Golf Course Cultural Landscape

The 2017 Cultural Landscape Inventory for the golf course defined the Rock Creek Park Golf Course Cultural Landscape (the cultural landscape) and established that the golf course is individually eligible for listing in the National Register under Criterion A in the area of recreation and under Criterion C in the area of landscape architecture (NPS 2017). The Rock Creek Park Golf Course represents a significant period in the history of golf in the United States and the development of municipal recreation in Washington, DC. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended periods of significance for the course are 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS Mission 66 program.

Landscape characteristics are the tangible and intangible aspects that, individually and collectively, create historic character and aid in understanding cultural importance. Characteristics related to the significance of the Rock Creek Park Golf Course Cultural Landscape are defined in the 2017 Cultural Landscape Inventory (NPS 2017). For the Rock Creek Park Golf Course, these characteristics are land use,

topography, spatial organization, views, vegetation, circulation, buildings and structures, and small-scale features. The 2017 Cultural Landscape Inventory determined that the Rock Creek Park Golf Course Cultural Landscape retains integrity from both periods of significance: the period of initial design and construction of the golf course and its associated features (1921-1927) and the replacement of the original clubhouse with a modern structure (1963-1964) (NPS 2017). Changes to the course from the 1950s expansion of Military Road NW impacted the course's integrity of design. Despite these changes, original landscape characteristics and features from both periods are present at Rock Creek Park Golf Course, and the cultural landscape displays all aspects of integrity as defined by the National Register: location, design, setting, materials, workmanship, feeling, and association. The following narrative addresses all features or resources that contribute to the significance of the cultural landscape.

Land Use

With the completion of construction, the Rock Creek Park Golf Course opened to the public in 1923. Since that time, the course has been continually operated as a public golf course.

Topography

Since the establishment of the Rock Creek Park Golf Course, the characteristic varied rolling topography of the course has changed little beyond the routine grading that has occurred with maintenance. The lowest point of the course is 200 feet above sea level, with the highest point at 290 feet above sea level. These high and low points correspond with the values recorded during the golf course's initial period of significance, confirming the consistent topography of the course.

Spatial Organization

The overall spatial organization of the Rock Creek Park Golf Course remains the same as established during both periods of significance. The existing clubhouse continues to serve as the central point for the two nine-hole loops of play. From the clubhouse, the progression of play moves through the course in a counterclockwise manner, a feature first introduced to the cultural landscape by Flynn. Flynn's decision to divide the course into a front nine and a back nine based on existing conditions is evident today. The front nine is placed in the more open, gently sloping portion of the cultural landscape, whereas the back nine is located in the steeper, more wooded western portion.



View of the existing farm road looking northeast from the clubhouse

Circulation

Formal vehicular circulation includes Joyce Road NW and the Golf Course Access Road NW, which are features from the initial period of significance. During the Mission 66 period, the circle drive in front of

the clubhouse was added and the parking lot was expanded to meet visitor needs. It was during this time that some of the more formally defined sidewalks were added around the clubhouse. A pre-existing farm road north of the clubhouse was incorporated into the circulation of the golf course. The progression of play through the golf course continues to consist of two self-contained counterclockwise loops: the front nine holes and the back nine holes. Formal circulation for pedestrians and golf carts was not planned for the course; as a result, a series of social trails have developed, disappeared, and shifted throughout the life of the course.

Buildings and Structures

Flynn's 1927 parkland-style course consisted of two self-contained counterclockwise loops centered on the clubhouse. Flynn designed the front nine holes along more generously sloping topography in visually open spaces with limited trees, appealing to the more novice player. The back nine holes were placed in the portion of the cultural landscape characterized by more dramatic topography and heavily wooded sections that frame the fairways. Modifications occurred in the 1950s with the realignment of Military Road NW. As a result, golf course architect William Gordon shifted the location of six of the front nine holes but maintained the overall routing established by Flynn. Elements of Flynn's design, including tee boxes, fairways, and greens, were incorporated into the new design where feasible. The design has remained to the present day.

The Mission 66-style clubhouse opened to the public in 1964 to replace a farmhouse that had previously served as the clubhouse. With limited modifications, it reflects the original design intent of the Mission 66 period. The clubhouse has a one-story front elevation facing the entrance drive and a two-story rear elevation facing the golf course. The design features vertical siding and brick exterior walls topped with a low-pitched gable roof. A prominent cantilevered roof on the rear elevation shelters a large window wall that overlooks parts of holes 9, 10, and 18 and visually connects the interior and exterior spaces. The clubhouse is a contributing resource to the cultural landscape. A one-story, metal-clad maintenance



View of the front and southwest side of the Mission 66-era clubhouse

building, located on the south side of the parking lot, was erected in 1982. This maintenance building is considered a non-contributing feature to the cultural landscape.

Vegetation

A character-defining feature of this cultural landscape is the juxtaposition of the visually open front nine with limited trees and the densely wooded or forested sections along the fairways of the back nine. This is due in part to land use prior to the golf course’s creation when the area associated with the front nine was clear for grazing and orchards. However, it was not devoid of trees, as Flynn intentionally incorporated mature trees into the placement of greens and introduced limited trees to divide fairways. With the back nine, Flynn identified existing large stands of trees and incorporated them into his design for the fairway, carving out defined, tree-lined corridors. Flynn also incorporated a row of red cedars (*Juniperus virginiana*) lining a historic farm lane into the course design. During the second period of significance, red oaks (*Quercus rubra*)³ and magnolias (*Magnolia* spp.) were added around the clubhouse building. The original turf grasses have been replaced, as is to be expected with long-term use of a golf course.

Views and Vistas

Flynn’s embrace of the dramatic topography of the cultural landscape created picturesque views throughout the course along the fairways toward the greens. This was further enhanced with the incorporation of mature trees and the strategic retention of forest stands throughout the course. The encroachment of vegetation has affected the integrity of some of the historic views originally found in the golf course.

Natural Systems and Features

Historically, two streams flowed through the western portion of the golf course. Both followed slopes toward the lower elevations of Rock Creek. While both were recorded during the initial period of significance, only the southernmost stream crossing fairway 17 exists today (NPS 2019a).

Summary of Character-Defining Features

Table 1 below provides a summary of the character-defining features for the Rock Creek Park Cultural Landscape as described in the 2017 Cultural Landscape Inventory and 2019 Cultural Landscape Report.

TABLE 1. ROCK CREEK PARK GOLF COURSE CHARACTER-DEFINING FEATURES

Landscape Characteristic	Character-Defining Feature
Land Use	<ul style="list-style-type: none"> • Continual use as a public golf course
Topography	<ul style="list-style-type: none"> • Varied natural topography throughout the site. Gentle slopes and rolling hills on the front nine, steep dramatic hills on the back nine
Spatial Organization	<ul style="list-style-type: none"> • Counterclockwise organization of golf course holes around clubhouse. Routing of holes 1–18 • Open, relatively treeless front nine and densely forested back nine • Circulation patterns connecting the clubhouse to neighborhoods to the east
Circulation	<ul style="list-style-type: none"> • Golf Course Access Road NW • Joyce Road NW between 16th Street NW and Golf Course Access Road NW • Golf cart path segment between clubhouse and Underwood Street NW

³ A 2022 tree survey completed as part of the data-gathering process for this project identified one Red Oak tree and two Red Maple (*Acer rubrum*) trees in the vicinity of the clubhouse.

Landscape Characteristic	Character-Defining Feature
Buildings and Structures	<ul style="list-style-type: none"> • William Flynn’s 1924–1926 era design for Rock Creek Park Golf Course • Mission 66 clubhouse
Vegetation	<ul style="list-style-type: none"> • Contrast between vegetation on the front and back nine with the front nine characterized by its open, relatively treeless landscape and the back nine defined by the dense areas of mature forests that surround the fairways • Native deciduous vegetation along the perimeter of the course • Native deciduous vegetation between fairways throughout the course • Row of red cedars along road north of clubhouse • Red oak trees surrounding clubhouse • Magnolia tree west of clubhouse
Views and Vistas	<ul style="list-style-type: none"> • View between fairways and greens on holes throughout course • Picturesque views of natural landscape throughout the course
Natural Systems and Features	<ul style="list-style-type: none"> • Stream crossing fairway 17

Environmental Trends

Average temperatures have risen dramatically since the 1900s and are projected to continue rising. In the District, days that exceed 95 degrees Fahrenheit (F) are expected to increase from a baseline average of 11 days to as many as 75 days per year (DC-CCCR 2022). Rising temperatures increase evaporation and dry the soil; within the District, this means that droughts are likely to intensify during the summer and fall months when precipitation is low. Resulting droughts may impact vegetation throughout the golf course, including vegetation that is considered contributing to the significance of the cultural landscape and the historic district. Climate change and air pollution threaten to alter the vegetation composition and structure of the cultural landscapes.

Impact Assessment Methodology

Potential impacts to the cultural landscape and historic district are evaluated based on changes to character-defining features of the resource, which are the characteristics of a historic property that qualify it for inclusion in the National Register. This approach is derived from the Secretary of the Interior’s Standards for Treatment of Historic Properties, Director’s Order #28: *Cultural Resource Management Guidelines*, as well as the regulations of the Advisory Council on Historic Preservation implementing the provisions of the NHPA. Character-defining features contribute to a property’s integrity, which is composed of location, design, setting, materials, workmanship, feeling, and/or association. The current conditions of the cultural landscape and historic district, as presented under the “Affected Environment” section above, were compared with the alternatives described in chapter 2 to determine the impacts to these resources.

A separate assessment of effect under Section 106 of the NHPA is being prepared for the proposed action concurrently with this EA. Its finding is noted in this section; however, the impacts described below are made under the CEQ’s regulations for implementing NEPA, which call for the review of effects on historic and cultural resources (40 CFR Part 1508.1[g]).

Impact of Alternative 1: No Action

Under the no-action alternative, NLT would continue to lease and manage the golf course. The course would continue operation as it is currently and standard maintenance practices for the course and

buildings would continue. Vegetation and non-native invasive plant species management would protect the character-defining vegetation, views, and vistas by promoting a healthy system for the native and designed vegetation within the golf course and its boundaries. Standard maintenance practices would also protect and preserve the clubhouse. Overall, there would be no alterations to the cultural landscape or historic district under the no-action alternative that would impact the character-defining features in a manner that would diminish the historic integrity of the resources. The Rock Creek Park Golf Course and the Rock Creek Park Historic District would remain eligible for listing in the National Register.

Impact of Alternative 2: Proposed Action (Preferred Alternative)

Changes to the routing of the William Flynn-designed golf course, modifications to its overall design from the construction of the 9-hole regulation course and the par-3 course, and the alteration and obstruction of views between the historic greens and holes from the construction of the proposed driving range structure would diminish the cultural landscape's integrity of design and result in an adverse impact to the cultural landscape. The adverse impact would be minimized as the proposed course routing would continue to be two nine-hole loops that begin and end at the clubhouse and are played counterclockwise. Although changes to Flynn's 1924–26 design would occur, the proposed changes to the course would restore and incorporate many of Flynn's original tees, greens, and fairways into the proposed design. The driving range structure would be sited within an existing basin and the natural topography, combined with the transparent nature of the structure, would minimize its visual impact on the landscape.

The demolition of the clubhouse would result in the complete loss of a resource that contributes to the cultural landscape and historic district. It would also diminish the integrity of design, materials, and workmanship of the cultural landscape and historic district. The new clubhouse would consist of a contemporary design that is compatible with the historic massing and materials of buildings and structures in Rock Creek Park.

Cumulative Impacts

In addition to the impacts of rehabilitating the golf course, other past, present, and reasonably foreseeable actions may affect the cultural landscape within the project area including the *White-Tailed Deer Management Plan*. That deer management plan is contributing a beneficial impact to the cultural landscape by reducing deer browsing on native vegetation and promoting regeneration of the tree stands that contribute to the significance of the cultural landscape. Though early results of this plan show forest regeneration at a low level, the number of seedlings has increased, which indicates improvement in regeneration. The proposed non-native invasive plant species management of the no-action and the proposed action would also contribute a beneficial increment to the cumulative impact to the cultural landscape by reducing non-native invasive plant species dominance over native plant species. When combined, the deer management and non-native invasive plant species management would work to promote forest regeneration and improve growing conditions for native plant species. This would result in an overall beneficial cumulative impact to the cultural landscape by protecting and promoting continued growth of the vegetation that contributes to its significance.

Conclusion

The no-action alternative would continue current management of cultural resources in the project areas, with some additional non-native invasive vegetation management. Though there would be a beneficial

cumulative impact to vegetation that contributes to the significance of the cultural landscape, this benefit would be relatively small based on the recorded trend of low-level forest regeneration. Overall, there would be no changes to character-defining features of the historic district or the cultural landscape.

Under the proposed action, changes to the routing, spatial organization, and views of the Rock Creek Park Golf Course Cultural Landscape would diminish the course's integrity of design. Demolition of the clubhouse would result in an additional loss of integrity of design, materials, and workmanship in addition to a complete loss of a contributing resource. The proposed new clubhouse would have a design that is compatible with the character of the cultural landscape and historic district. Methods of avoiding, minimizing, and mitigating these adverse impacts to the cultural landscape and historic district are being developed in ongoing consultation with NLT, NPS, DC SHPO, and other interested parties. Through the consultation process under Section 106 of the NHPA, NLT and NPS are pursuing the negotiation and execution of an MOA between the NPS, DC SHPO, and NCPC to resolve these adverse effects according to 36 CFR 800.6(c). Though there would be a beneficial cumulative impact to vegetation that contributes to the significance of the cultural landscape, this benefit would be relatively small based on the recorded trend of low-level forest regeneration. Overall, the proposed action would not result in changes that would diminish the historic integrity of the cultural landscape or the historic district in a manner that would impact their eligibility for listing the National Register.

VEGETATION

Affected Environment

Rock Creek Park Golf Course is set within Rock Creek Park, one of the largest urban parks in the country. The golf course sits within U.S. Reservation 339, which consists of more than 1,700 acres of park land, much of which is diverse forested habitat. While the golf course's construction required clearing a substantial amount of forest to establish the tees, fairways and greens, a hallmark of William Flynn's landscape design was using the surrounding landscape and native plants as inspiration, creating fairways that fit into the natural landscape. Currently, the front nine holes are characterized by visually open spaces, gentle slopes, and wide fairways. The back five holes are characterized by narrow fairways, dense forest stands, and steep slopes. While the course was designed to fit into the natural landscape, over time trees and non-native invasive plant species have encroached on open fairways and paths, and tree growth has caused turf conditions to deteriorate due to increased shade, as shown in figure 17 below. Bare fairways and shade tolerant weeds caused operators to abandon care to several holes in 2015. Much of the existing open space is dominated by turf grasses, non-native, and invasive plant species.

Figure 17. Extent of Existing Forested Areas in Comparison to the 1927 Flynn Plan



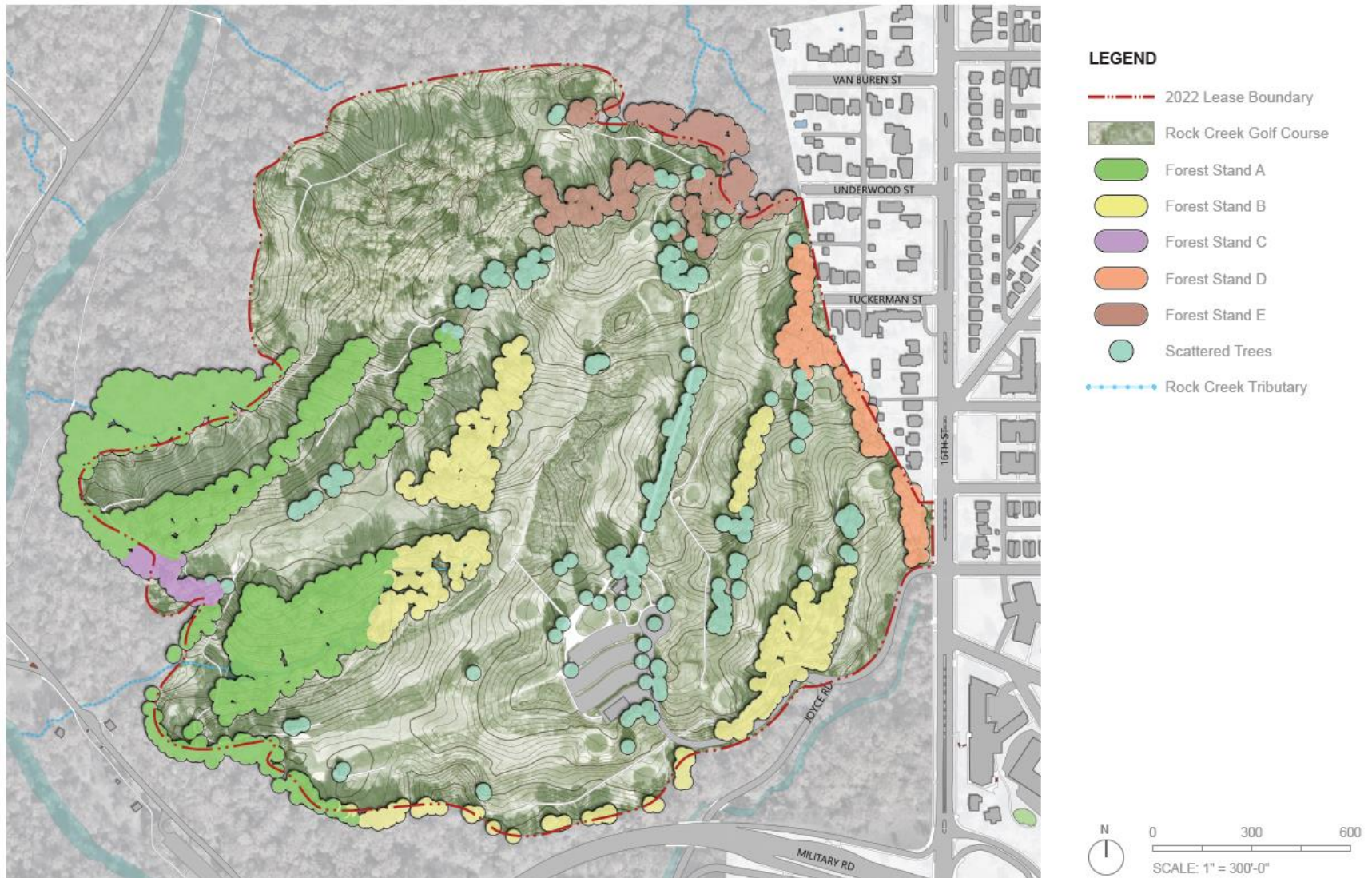
The forest vegetation of Rock Creek Park Golf Course can be classified into five tree stands, each unique in the tree species makeup and overall stand health. Tree surveys and stand delineation were prepared in early 2022, with an overview provided in table 2 below. Predominant tree species are tuliptree (*Liriodendron tulipifera*), American beech (*Fagus grandifolia*), mixed oak (*Quercus*) and maple (*Acer*) species. The understory of these stands is made up of mostly non-native invasive groundcover, with species such as Asian bittersweet (*Celastrus orbiculatus*), Japanese honeysuckle (*Lonicera japonica*), winter creeper (*Euonymus fortunei*) and English ivy (*Hedera helix*). The average understory in all five stands is made up of approximately 40% non-native invasive plant material. It is worth noting that a northwestern portion of the site that would be maintained in a natural state (not subject to forest clearing) was not included in the tree survey; however, the species makeup of the forest stands in this area is generally similar to the rest of the golf course. See figure 18 below for a map of the tree stands.

TABLE 2. FOREST STAND CONDITIONS

Stand	Size (acres)	Condition*	Detailed Condition*
Stand A	11.88	Good	High species diversity, trees in good health, understory is dominated by non-native invasive plant species
Stand B	6.93	Fair	Some species diversity, non-native invasive plant species in all forest levels, climbing vines are abundant
Stand C	0.54	Fair to Poor	Non-native invasive plant species and vines prevalent, trees appear stressed overall
Stand D	1.66	Fair	Large trees, low diversity, abundant non-native invasive plant species and climbing vines
Stand E	3.09	Fair	Stand lacks diversity, abundant climbing vines and non-native invasive plant species along forest edge

*Source: Coastal Resources Inc 2022

Figure 18. Forest Stands





View from the clubhouse into the open front with forested areas serving as vegetated buffers between the holes

Environmental Trends

Average temperatures have risen dramatically since the 1900s and are projected to continue rising. In the District, days that exceed 95 degrees Fahrenheit (F) are expected to increase from a baseline average of 11 days to as many as 75 days per year (DC-CCCR 2022). Rising temperatures increase evaporation and dry the soil; within the District, this means that droughts are likely to intensify during the summer and fall months when precipitation is low. Resulting droughts make growing turf more difficult and may require additional irrigation to maintain quality turf on tees, fairways, and greens. As temperatures increase, ground-level ozone becomes more common; the District is expected to see an increase of up to nine additional high ozone days per year by 2050 (DC-CCCR 2022). Ground-level ozone concentration is documented to result in a reduction in tree growth, reduction of new plant establishment, visible leaf injury, as well as additional sensitivity to stressors such as pests, disease, or drought (NPS 2018). Within Rock Creek Park, the NPS identified 45 plant species that are sensitive to concentrations of ground-level ozone (NPS 2023b). Based on long-term monitoring data, the NPS has categorized the ground-level ozone concentrations within Rock Creek Park as “fair” for vegetation health, and the ozone concentration levels have remained relatively unchanged for the 10-year monitoring period beginning in 2012 (NPS 2021a).

Forest regeneration within Rock Creek Park and other National Capital Region units has been monitored by the National Capital Region, Inventory & Monitoring Network (NCRN I&M) since 2006. This long-term data shows that forest regeneration has been at low levels and continues on that trend. Threats such as herbivorous white-tailed deer and non-native invasive plant crowding have resulted in difficulty for seedlings to grow into saplings that can eventually replace canopy trees. Specifically, a park is considered to have healthy regeneration if the Stocking Index shows that 67% of its forest plots are adequately stocked with seedlings and small saplings. Since monitoring began, Rock Creek Park has not exceeded 30% (NPS 2022b). This regeneration process is crucial to a diverse forest that is able to sustain itself for generations. Deer management at Rock Creek Park is ongoing to improve forest regeneration. Since the process of seedlings growing into saplings and saplings growing into young trees is slow, it takes many

years for forest regeneration trends to adjust. The data collected by the NCRN I&M team since deer management began shows small but notable improvements to the number of tree seedlings within the park. According to the data, the number of tree seedlings in the park has tripled since the start of deer management. Though the numbers are still low, the improvements show promise for the long-term forest regeneration process for Rock Creek Park (NPS 2022b).



View of poor turf conditions as viewed between the ninth and tenth holes

Impact Assessment Methodology

Potential impacts to vegetation are evaluated based on changes to tree stands in their current configuration, native and non-native invasive plants, and the successional growth throughout the property. Past administrative and planning documents provided background on the current health of the vegetation in the park. Anticipated impacts to vegetation were analyzed using information from park staff and previous studies. The potential for changes to vegetation was evaluated by assessing the limitation and assumed changes that would occur under each alternative and determining whether the projected changes would affect the overall plant diversity and health of the vegetation at Rock Creek Park Golf Course.

Impacts of Alternative 1: No Action

Under the no-action alternative, the golf course layout and associated facilities would remain in their existing layout. Vegetation would be maintained on an as-needed basis. The successional forest edge and non-native invasive vegetation would be managed to prevent additional encroachment on existing holes. With tree stands generally unchanged, turf grass would continue to be subject to shading and competition for resources.

Under the no-action alternative, the tree stands would remain generally as they are, with modest maintenance along the forest edges, each in varying stand health conditions. Stands A, B, D, and E are in good or fair condition. Stand C is in fair to poor condition due to the forest containing a variety of tree species with a prevalence of non-native invasive plant species and vines, as well (Coastal Resources Inc 2022). Although maintenance would be modest, the NPS and NLT would continue to monitor the stands and would address hazardous trees, non-native invasive plants, or declines in tree health on an as-needed basis.

Impacts of Alternative 2: Proposed Action (Preferred Alternative)

Creation of the revised course, including relocation of the maintenance facility, would require removal of specific portions of the existing forest stands. Additional removal of vegetation would be focused on non-native invasive plant species, some encroaching successional forest, and specific mature trees.

A total of 2,571 trees within the stands described above were inventoried for this project, comprising most of the golf course but excluding the northern portion where no clearing is proposed. Under the proposed action, NLT may remove up to 1,262 trees (49% of the trees inventoried). Of these 1,262 trees, approximately 100 may date from the period of significance. This equates to 9% of the trees subject to removal or 4% of the total inventory. Of these 1,262 trees, 1,037 (82%) are part of an initial phase of removal; these trees would be removed due to construction (478, 57 of which are non-native trees), tree condition (443 poor condition and dead, 77 of which are non-native, invasive trees), and to promote sustainable agronomy (346, 55 of which are non-native, invasive trees). Of the 1,262 trees, the remaining 225 (18%) would comprise the second phase of removals; they would be field assessed to determine if they can be retained. Of this group, 85 may need removal for construction and grading and 140 are to be assessed to see if they promote sustainable agronomy. There are no non-native, invasive trees or poor condition trees in this group because those are assigned to phase one removal.

The clearing plan by forest stand is quantified in table 3 and is displayed on figure 19 below. Certain trees that contribute to the historic integrity of the course would be avoided.

TABLE 3. FOREST STAND IMPACTS

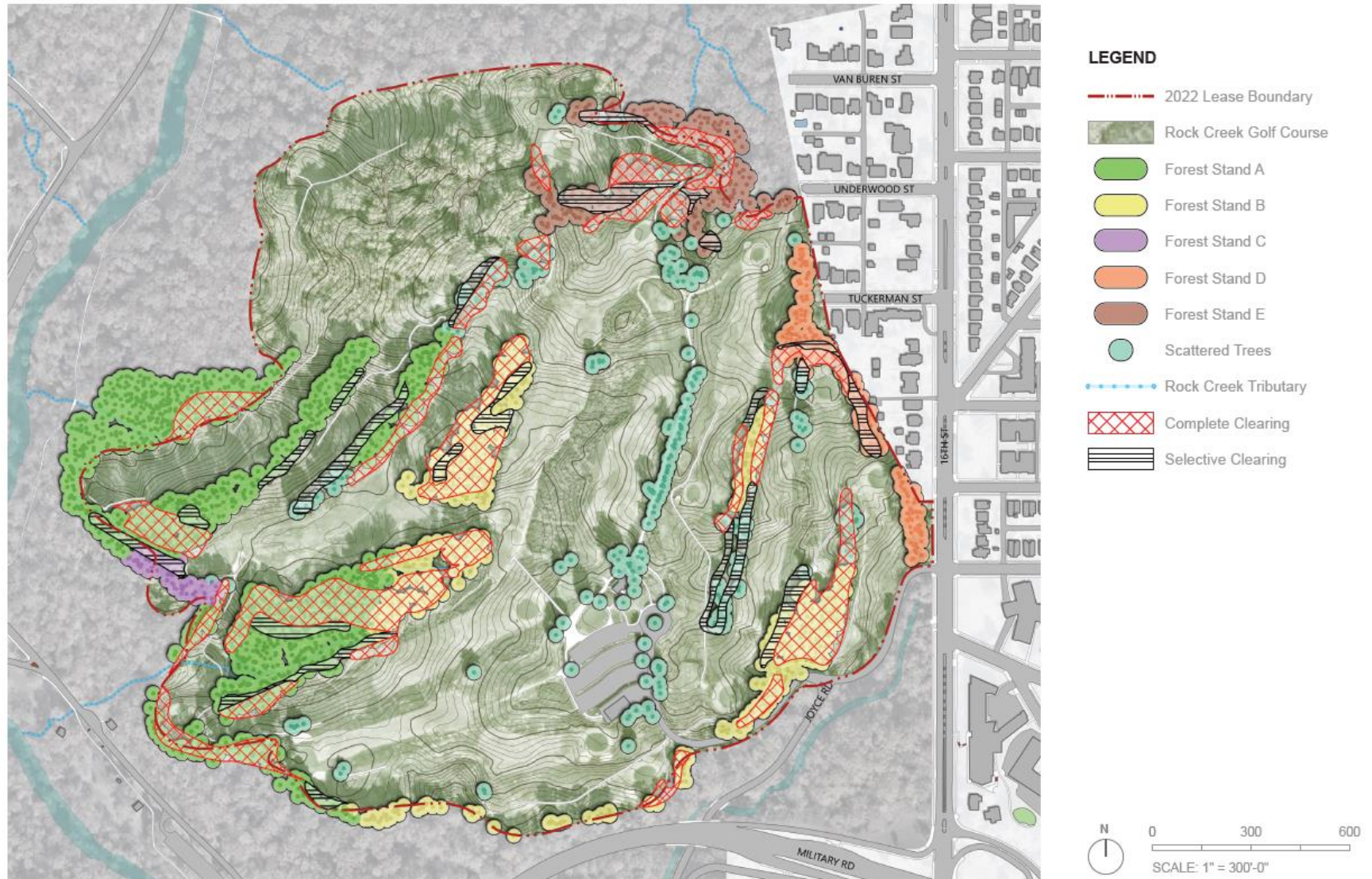
Forest Stand	Acreage to be Completely Cleared	Acreage of Selective Tree Removal	Total Stand Acreage
Stand A	3.60	1.23	11.88
Stand B	3.83	0.69	6.93
Stand C	0.05	0.17	.54
Stand D	0.27	0.37	1.66
Stand E	0.89	0.60	3.09

Following the tree and non-native invasive clearing described above, NLT would plant close to 200 trees, including eastern redbud (*Cercis canadensis*), dogwood (*Cornus florida*), American holly (*Ilex opaca*), eastern red cedar (*Juniperus virginiana*), several native oak species (*Quercus spp.*), and Sassafras (*Sassafras albidum*).

Under the proposed action, non-native invasive plant species that have become established in many areas of the course would be targeted for recurring control and removal as part of regular golf course management. Plantings would integrate pollinator and native plant species consistent with the historic design by William Flynn to create a diversity of landscapes throughout the golf course.

Additionally, NLT would develop pollinator meadows, naturalized areas and riparian buffers, and native grass meadows, comprising 5.16 acres, 5.75 acres, and 8.36 acres, respectively, in various locations throughout the golf course (see figure 5 in chapter 2 for detailed locations). More than 8 acres of meadows would be scattered in patches throughout the rehabilitated golf course, and approximately 4.5 acres on the northern edge of the golf course (historically used for holes 12 and 13) which would be repurposed as meadow habitat. The plants to be seeded in these areas would be a native pollinator meadow mix. While the planting plan remains under development, in coordination with NPS, it is likely to include native shrubs in the naturalized areas along forest edges to prevent non-native invasive plants from becoming reestablished.

Figure 19. Clearing Plan by Forest Stand



Under the proposed action, a non-native invasive plant species management plan would be implemented to reduce invasive re-growth and improve growing conditions for native plantings. Establishment of these native species would allow the non-native invasive plant species removed to be suppressed and ensure contiguous native habitat. Removal of non-native invasive plant species would take place using multiple methods of control, including manual, cultural, chemical, and biological (e.g., goats). During construction of the revised course and accompanying pathways, geotextile, mulch and wooden mats would be applied on access zones to protect trees and other vegetation.

Cumulative Impacts

In addition to the impacts of rehabilitating the golf course, other past, present, and reasonably foreseeable actions may affect vegetation within the project area including the *White-Tailed Deer Management Plan*. That deer management plan is contributing a beneficial impact to vegetation within Rock Creek Park Golf Course by reducing deer browsing on native vegetation to improve long-term forest regeneration. Though early results of this plan show forest regeneration at a low level, the number of seedlings has increased, which indicates improvement in regeneration. The proposed non-native invasive plant species management of the no-action and the proposed action would also contribute a beneficial increment to the cumulative impact to vegetation by reducing non-native invasive plant species dominance over native plant species. When combined, the deer management and non-native invasive plant species management would work to promote forest regeneration and improve growing conditions for native plant species, resulting in an overall beneficial cumulative impact to vegetation.

Conclusion

Under the no-action alternative, the golf course and associated facilities would remain in their existing layout and would be subject to slightly improved operational management. Changes to vegetation would occur on an as-needed basis with a focus on managing non-native invasive plant species. Successional forest edge vegetation would be managed as needed to prevent additional encroachment on the existing course. The existing stands may continue to hinder golf course operators' ability to maintain turf grass. Although maintenance would be modest, the NPS and NLT would continue to monitor the stands and would address hazardous trees, invasive plants, and any declines in tree health. Though there would be a beneficial cumulative impact to vegetation, this benefit would be relatively small based on the recorded trend of low-level forest regeneration. Overall, the modest management of non-native invasive plant species, tree health, and hazardous trees would provide some direct benefits, the no-action alternative may result in an overall indirect adverse impact because native, established vegetation at the course would continue to compete with non-native invasive plant species.

Under the proposed action, non-native invasive plant species would be managed and removed, in conjunction with regular golf course management. Direct impacts under the proposed action include removing vegetation to accommodate changes to the routing and spatial organization of the golf course to restore, to the greatest extent possible, the historic golf course layout.

As noted in chapter 2, NLT, in coordination with NPS, developed a plan to selectively remove trees that encroach on historic view corridors and affect playability. Specimen trees that support the historic character of the property were identified for protection and would be maintained. Before identifying a tree for removal, consideration was given to pruning, elevation of lower limbs, opening crowns and other measures that could achieve the same goals.

The criteria for selection of trees for removal was based on an evaluation of the following factors:

- Overall condition of the tree
- Adverse shade impacts on turf and desired vegetation
- Adverse impact on air circulation on turf areas
- Adverse impacts from roots on turf conditions, cart paths, and other landscape features
- Trees changing original design intent from the period of significance (where forest stands are encroaching on original golf course design)
- High risk of dead limbs or entire tree causing injury or other safety concerns
- Defects due to poor tree health from insects or disease

The clearing described in this plan is the maximum anticipated extent of tree/forest removal. NPS staff would continue to work closely with NLT as tree clearing proceeds, allowing for adjustments that could result in reduced clearing. Overall, NLT's management of non-native, invasive plant species would intensify and be more deliberate under the proposed action as compared to the no-action alternative.

There would be an adverse cumulative impact to vegetation from the removal of nearly 8 acres of trees from the golf course. This impact would be in part mitigated from the establishment of more than 13 acres of meadow habitat on the course, the heightened focus on removal of invasive non-native plants course-wide, and the replanting of nearly 200 trees in areas throughout the golf course, as detailed previously.

WILDLIFE AND WILDLIFE HABITAT

Affected Environment

The park protects a natural landscape consisting of deciduous forests and meadows, which provide habitat for many plant and animal species (NPS 2015). The park provides open meadow habitat for species. Healthy meadows provide a diverse range of nesting and foraging habitats that are often lost in urban areas. In addition, biodiversity of plant species in a meadow promotes pollinator success, while the edge habitat surrounding open meadows provides crucial habitat for some nesting species. The golf course provides habitat for many of the same species found within the wider park and within adjacent neighborhoods. The nature of the golf course layout provides a mix of open habitat between discrete forest stands, with several acres of edge habitat at the interface between the two habitat types.

According to the NPS species database, 30 species of mammals, 11 species of amphibians, 14 species of reptiles, and 182 species of birds are present or probably present within Rock Creek Park (NPS 2023c). Common species that inhabit the golf course include white-tailed deer, which feed on tree seedlings and other park vegetation. These deer are overpopulated in the park and are managed by the 2011 *White-Tailed Deer Management Plan*, which seeks to reduce deer browsing on native vegetation. Other common mammals include foxes, squirrels, and raccoons. Wood frogs are also present in the project area and their eggs have been observed in a small vernal pool located in a wooded area in the northwest section of the golf course. Wetlands located within the golf course are important habitat for these frogs, as well as various snake, lizard, and turtle species. The park is also home to birds such as warblers and vireos, which forage in treetops for insects, as well as woodpeckers, which search the tree bark for insects (NPS 2019b). Some birds live in the park year-round, while others pass through on their way north or south during migration. Heron, which feed on fish and amphibians, are also present in the park. Primary habitat-based threats in the park include recreational activities and infrastructure, such as social trails that disturb habitat

areas (DC DOEE 2015). In addition, wild turkey (*Meleagris gallopavo*) are present in the park and typically inhabit riparian zones, forest clearings, and meadows. Forested areas are often used for foraging, daytime resting and escape cover, and nighttime roosting (USDA 2018). Wild turkey are ground feeders and eat both plants and animals, including nuts, seeds, fruits, insects, and small reptiles (USDA 2018). Turkeys typically feed early in the morning after leaving their roosts and again in the mid- to late afternoon before returning to their roosts (USDA 2018). Wild turkeys have adapted to many urban and suburban habitats. Another common species found at the park is the coyote (*Canis latrans*). Coyotes hunt small animals such as mice, amphibians, snakes, and birds. They also eat deceased animals, berries, and other vegetation (NPS 2019c). Over time, coyotes have adapted to a wide range of habitats, including swamps, prairies, and grasslands (USDA 2020). Coyotes occur in urban and suburban environments and have become less wary of humans and grown acclimated to human interactions. Coyotes seek shelter in protected areas; when rearing their young, coyotes use dens, also in protected areas, such as brush or rock piles, haystacks, or below ground (USDA 2020).

Included in the broad range of wildlife using the park are several species federally listed (current and anticipated) as threatened or endangered that may use the golf course. The monarch butterfly (*Danaus plexippus*) is a candidate for federal listing and depends on milkweed species for larval hosts. Other flowering plants serve as food sources for adult butterflies. Primary threats to the monarch's biological status include loss and degradation of habitat from conversion of grasslands to agriculture, widespread use of herbicides, urban development, drought, exposure to insecticides, and effects of climate change (USFWS 2023a).

The Hay's spring amphipod (*Stygobromus hayi*) is listed as endangered and is found only within 2.5 miles of the Lower Rock Creek watershed, which includes Rock Creek Park Golf Course. Although no individuals have been found within the golf course itself, there are populations known nearby. It lives within seepages and groundwater within this watershed. Primary threats to the species are degradation of water quality and water quantity caused by stormwater runoff from impervious surfaces (USFWS 2021).

Several species of bat, including the federally endangered northern long-eared bat (*Myotis septentrionalis*), federally endangered Indiana bat (*Myotis sodalis*), and proposed-as-endangered tricolored bat (*Perimyotis subflavus*), have been recorded in the park. During the summer (and portions of the fall and spring), all three species of these bats roost in trees (albeit in different parts of the trees). Northern long-eared bats tend to forage within forested habitat (USFWS 2023b), while Indiana bats forage along forest edges (USFWS 2006). Tricolored bats are opportunistic feeders and may use more diverse foraging habitats (USFWS 2023c). A fungal disease known as white-nose syndrome (*Pseudogymnoascus destructans*) has heavily reduced population levels of these bats. Disturbance and destruction of hibernating, foraging, and roosting habitat from urban development, along with other factors to include pesticide use, has caused these populations to decline.

Environmental Trends

Anticipated changes to vegetation in the project area have the potential to alter wildlife habitats and foraging behaviors. More broadly, rising temperatures from climate change can threaten species survival rates and destabilize the balance between wildlife and their ecosystem (NPS 2021b). Some species may struggle to find nutritious enough food to fit their existing diet. Pollinators, for example, must feed on flowers that are blooming earlier in the year. Other animals may find their habitats are no longer able to support their biology. However, it is also possible that some animals will do better in a warmer climate. Those species may outcompete others, expanding their own territory and food sources. When species

adapted to their environments lose their natural advantages, invasive species can multiply in the changing environment. For instance, Emerald Ash Borers and Gypsy Moths are invasive species commonly found in the National Capital Region that have devastated native communities (NPS 2021b). Climate change can also affect migration patterns and timing for certain species, specifically wood thrush and monarch butterflies, which are both found at Rock Creek Park. Climate change may also further exacerbate the impact of stormwater runoff on seepage and groundwater habitat for Hay's spring amphipods due to more severe storm events (USFWS 2021). As described under the "Vegetation" section above, increasing ground-level ozone concentration may reduce tree growth, reduce new plant establishment, cause visible leaf injury, and cause additional vegetation sensitivity to stressors such as pests, disease, or drought (NPS 2018).

Impact Assessment Methodology

Potential impacts to wildlife and wildlife habitat are evaluated based on potential changes to wildlife habitat and potential effects on wildlife populations in the project area. Past administrative and planning documents provided background on the current health of the vegetation in the park and the species that may be using that habitat. Anticipated impacts to wildlife and wildlife habitat were analyzed using information from park staff, coordination with USFWS, USFWS's Information for Planning and Consultation (IPaC) tool, and previous studies. The potential for changes to wildlife and wildlife habitat was evaluated by assessing the limitation and assumed changes that would occur under each alternative and determining whether the projected changes would affect overall wildlife, habitat diversity, and health of species found within Rock Creek Park Golf Course.

Impacts of Alternative 1: No Action

Under the no-action alternative, the golf course layout would remain in its existing configuration, continuing to provide habitat for many animal species at the park. The natural landscape and composition of forests and meadows would remain generally unaltered, with edge habitat between various habitat types. While NLT would continue to remove non-native invasive plant species, tree stand health may continue to decline in some areas, likely reducing native habitat and food sources, and the incomplete coverage of vegetation would continue contributing to erosion and runoff. Under the no-action alternative the proposed meadows would not be developed, thereby maintaining the current overall habitat diversity for wildlife. Wildlife currently using the golf course, including any federally listed species, would be generally unaffected by the modest, as-needed vegetation and other operational management that would take place under the no-action alternative.

Impacts of Alternative 2: Proposed Action (Preferred Alternative)

Under the proposed action, NLT would partially clear some tree stands, reducing the amount of forested habitat at the golf course. NLT would also implement a comprehensive effort to remove invasive species throughout the golf course, improving the quality of the edge habitat. The ecological trail is proposed along a route that minimizes the creation of new edge habitat. Wildlife using these areas would be disturbed during clearing efforts. Forested habitat would be permanently lost, likely resulting in the displacement of some species of wildlife. This impact could be minimal to moderate in intensity, as forest-dependent animals may be able to re-establish within adjacent forested areas. Phasing tree clearing, and completing it during late fall/winter seasons, would reduce the intensity of habitat loss at one time and would enable NLT to more precisely select trees for removal during a subsequent phase, which could result in less removal and habitat loss in the future. Furthermore, NLT would plant close to 200 trees of

native species following clearing efforts and would collaborate with the NPS on the establishment of grassy, riparian, and meadow habitats (where golf holes previously existed), some of which would be planted with species tailored to native pollinators, which may increase the species diversity within the golf course. Animal species using open or edge habitat types would likely benefit from the establishment and maintenance of new native grassy, meadow, and riparian habitat areas and from a focused effort at removing non-native invasive plant species. Animal species using forested habitat, such as wild turkeys who forage and rest in these areas, may be disturbed by noise and habitat removal during tree clearing. Although some vegetation food sources and roosting areas may be removed, wild turkeys would likely relocate to other areas of the park to forage and roost during tree clearing efforts. Common wildlife species, such as deer, coyotes, racoon, squirrels, robins, and cardinals, are familiar with fragmented, urbanized habitat. They may avoid areas of construction/tree removal and could be expected to return to these habitats once construction/tree removal is complete. However, some sensitive wildlife species may abandon a breeding or nesting site if their habitat is disturbed. Tree clearing activities may affect or remove shelter that coyotes use for habitat, including their ability to find suitable dens for rearing their young. Generally, though, coyotes have adapted to dynamic urban and suburban environments and are adept at finding new shelters with similar characteristics.

NLT would implement conservation measures as appropriate to minimize or avoid the potential to have any adverse effects on federally listed species. The development of dispersed native meadow habitats with plantings targeted towards pollinators may benefit monarch butterflies. NLT would develop these meadows using the best practices prescribed by the USFWS and NPS, to help minimize impacts to wildlife. NLT, in coordination with NPS, would plan and implement an invasive, non-native plant control plan well ahead of meadow planting. The plan's strategy could be adaptive, encouraging the growth of meadow plants and reduce the colonization of trees and shrubs, while maintaining year-round habitat for wildlife. Treatment of meadows would change depending on the restoration status of the meadow. Recently planted meadows would need to be mowed annually in order to prevent non-native invasive plant and woody growth. Mowing sessions would occur no earlier than mid-November in the fall, to a height of 6-18 inches, to provide overwintering habitat for insects. Spring mowing would occur in late March to early April, but no later than April 15, and would be of a height between 3-6 inches. As climate change continues to affect monarch migration times, the NPS would consider adaptive management approaches for mowing that adhere to guidance concerning changes in migration timing.

Tree clearing and building demolition associated with the proposed action would take place outside of the active season of the northern long-eared bat, April 1 to October 31. In conjunction with regular golf course management, the NPS and NLT would continue to monitor tree stand health, addressing hazardous trees or declines in tree health on an as-needed basis. NLT has also developed a lighting plan that minimizes light pollution and directs light downwards. All lighting would be compliant with the DarkSky Approved program and would be turned off when not in use (the golf course would likely close by 10 pm, if not earlier). The lighting plan considers Institution of Lighting Professionals guidance for reduction of obtrusive light (GN01/21) and for bats and artificial lighting (GN08/18). Some specific mitigation measures incorporated include use of a color range (2,200K to 3,000K LED) to reduce sky glow and be less disruptive to any bats using the area, use of berm-mounted lighting, use of individual reflectors internally on every LED in each module to reduce spill light and tightly control where light is put in the environment, and use of an additional visor to help shield the face of the fitting from view and helping further control the light. As such, any changes in the behavior of any federally listed bat species are

expected to be minimized or avoided altogether. The improvements included in the lighting plan and specific mitigation measures would also benefit migrating birds.

The use of standard erosion and sediment control during grading and construction would help avoid impacts to Hay's spring amphipod and wetland communities, specifically the effects of runoff. Stormwater runoff from impervious surfaces is the greatest threat to this species as it is sensitive to water quality and water pollution (USFWS 2022). If the NLT moves ahead with plans to install a well on site, installation would take place in accordance with any monitoring and mitigation measures developed in conjunction with the NPS and USFWS to understand any impacts to the local hydrology. The scale of monitoring would be consistent with specific species' biology.

Based on the implementation of relevant conservation measures and adherence to standard time-of-year restrictions, the NPS anticipates the proposed action would be unlikely to adversely affect any federally listed (or candidate) species.

Cumulative Impacts

In addition to the impacts of rehabilitating the golf course, other past, present, and reasonably foreseeable actions may affect wildlife and wildlife habitat within the project area, including the *White-Tailed Deer Management Plan*. That deer management plan is contributing a beneficial impact to wildlife and habitat within Rock Creek Park Golf Course by reducing deer browsing on native vegetation to improve long-term forest regeneration and plant diversity. Though early results of this plan show forest regeneration at a low level, the number of seedlings has increased, which indicates improvement in regeneration and increased habitat diversity. These actions would promote forest regeneration and improve growing conditions for native plant species, resulting in a beneficial impact to wildlife habitat. The proposed action would be an adverse impact to wildlife and wildlife habitat through the removal and clearing of trees used for habitat. However, this would be mitigated in part by implementing clearing restrictions and mitigation measures. The proposed action would also contribute a beneficial increment to the cumulative impact through the establishment of native pollinator meadow habitat, the planting of new trees, and non-native invasive plant species management. These actions, combined with the *White-Tailed Deer Management Plan* would result in an overall beneficial cumulative impact to wildlife habitat.

Conclusion

Under the no-action alternative, the golf course and associated facilities would remain in their existing layout and would be subject to slightly improved operational management. Changes to vegetative habitat would occur on an as-needed basis, with a focus on managing non-native invasive plant species.

Successional forest edge habitat would be managed as needed to prevent additional encroachment on the existing course. Though there would be a beneficial cumulative impact to vegetation habitat, this benefit would be relatively small based on the recorded trend of low-level forest regeneration and reestablishment of native species. Overall, wildlife currently using the golf course, including any federally listed species, would be generally unaffected by the modest, as-needed vegetation and other operational management that would take place under the no-action alternative.

Under the proposed action, non-native invasive plant species would be subject to more intensive removal, in conjunction with regular golf course management. Direct impacts under the proposed action include permanently removing portions of forest habitat to accommodate changes to the routing and spatial organization of the golf course to accommodate restoration, to the greatest extent possible, of the historic

golf course layout. This may displace wildlife species. The addition of newly created meadows would provide a beneficial impact to wildlife by broadening habitat diversity including increased grass areas and edge habitats. This potential increase in biodiversity is rooted in NLT's efforts to provide ecological benefits while also restoring the historic layout of the golf course, which is necessarily a mix of forest stands and open areas.

There would be an adverse cumulative impact to forested habitat from the removal of nearly 8 acres of trees from the golf course. This impact would be in part mitigated from the establishment of more than 13 acres of meadow habitat on the course, the heightened focus on removal of invasive non-native plants course-wide, and the replanting of nearly 200 trees in areas throughout the golf course, as detailed in previous chapters.

VISITOR USE AND EXPERIENCE

Affected Environment

Approximately 24,000 people visited Rock Creek Park Golf Course in 2022, which is an increase over the past decade; from 2013 to 2019, the golf course saw approximately 12-18,000 visitors each year (NPS 2023a). Today, these visitors experience a golf course with limited facilities and obvious signs of deferred maintenance.

To access the golf course, visitors enter along a narrow, curvilinear road that is designed for motor vehicles; pedestrians and cyclists must share the narrow road with vehicles. Pedestrians and cyclists are unable to connect to the rest of Rock Creek Park via the golf course. As visitors arrive at the golf course, they experience an entrance that is relatively inhospitable and does not provide a sense of arrival. When travelling along the entrance road, the first visible building is the maintenance building. The building has a basic industrial appearance and is surrounded by a rusted, vine-covered chain link fence. Visitors continue along the entrance road to a turn-around/drop-off loop and paved parking lot that was designed in the 1960s.



View of the 12th hole which is closed due to tree encroachment that has narrowed the fairway into unplayable conditions

Golfers experience a 14-hole course, instead of the standard 18-hole course, with a counterclockwise progression of play centered on the clubhouse. The front nine holes provide a visually open experience with gentle slopes and wide fairways. The back five holes are characterized by narrow fairways, dense forests, and steep slopes. Golfers are currently unable to play four of the original back nine holes because they are closed due to tree encroachment and poor turf conditions. On the back five holes, golfers experience fairways that are narrower than designed due to the overgrown and encroaching vegetation of the forested edge and internal wooded corridors. This encroachment and narrowing of the fairways make the course difficult to play. Non-native invasive vegetation, especially vines, cover the original stands of trees and block views into the naturalized forest areas of the golf course.

Visitors using the golf course experience fairways, greens, and tees with worn turf resulting from poor drainage, poor irrigation, poor soils, lack of air circulation, and shaded conditions. They experience golf cart paths that are poorly defined and inconsistently surfaced. Some paths are paved, but they are too narrow for their shared use and the surface is deteriorating; other paths are gravel or dirt. These narrow paths are shared with pedestrians, golf carts, and maintenance vehicles. Novice golfers visiting Rock Creek Park Golf Course have limited options; there is no driving range and the golf course itself is difficult to play due to the narrow fairways. Non-golfers wishing to recreate or participate in nature-viewing activities at the golf course have to use the same narrow cart paths as golfers. There are no other recreational opportunities for non-golfers.

The existing clubhouse provides visitors with restrooms and a retail shop; pre-packaged snacks such as bags of chips and bottled beverages are available for purchase. The restrooms are located in the basement level, and though they can be accessed from the exterior at grade, they are not fully ABAAS accessible.

Impact Assessment Methodology

Potential impacts to visitor use and experience are evaluated based on changes to types of visitor experiences, access and circulation, opportunities for recreation, and visitor safety. Past administrative and planning documents provided background on changes to visitor use and experience over time. Anticipated impacts to visitor use and experience were analyzed using information from park staff and previous studies. The potential for changes to visitor use and experience was evaluated by assessing the changes that would occur under each alternative and determining whether the projected changes would affect visitor experience.

Impacts of Alternative 1: No Action

Under the no-action alternative, the visitor experience of the golf course would generally remain the same as under the existing conditions. Visitors would continue to arrive via the narrow roadway and experience an unremarkable entrance to the golf course that is intruded upon by the maintenance facility and is focused upon vehicular access (with no specific accommodations for bicyclists or pedestrians). Golfers would continue to have the opportunity to play on a 14-hole golf course that is difficult to play due to encroaching vegetation and narrowing fairways; four holes would remain unavailable for play. Novice golfers and non-golfers would have limited options due to the difficulty level of the course and the lack of non-golfing recreational opportunities. Circulation through the golf course would remain on narrow, inconsistently surfaced cart paths shared by golf carts, pedestrians, and maintenance vehicles. The clubhouse would continue to provide restrooms and a retail shop for visitors; food options would continue to be restricted to pre-packaged snacks, such as bags of chips and bottled beverages.

Repairs and vegetation maintenance would be completed as needed to improve the visitor experience. For example, some encroaching vegetation may be trimmed as needed, and non-native invasive vegetation would be treated for removal. These actions may improve the visibility or playability for a specific hole where the actions are undertaken; however, the overall user experience of the golf course would not be substantially altered by these types of improvements. Implementation of the no-action would result in an overall continuation of the existing visitor use and experience of the golf course.

Impacts of Alternative 2: Proposed Action (Preferred Alternative)

Under the proposed action, visitors to the golf course would experience a parkland-style course that incorporates features from Flynn's original design. Long, expansive views and natural topography would be part of the overall experience of the parkland-style course. Golfers would experience a full 18-hole golf course with varying levels of difficulty. Golfers from experienced to beginners would have opportunities to play due to the combination of a more difficult 9-hole regulation course and a shorter and easier 9-hole par-3 course. Access to a shorter and easier course would be especially well-suited for First Tee of Greater Washington, which is the local chapter of a national youth sports and educational program that uses golf to teach children and teens life lessons and leadership skills and would be headquartered at the Rock Creek Park Golf Course. The proposed driving range would provide a new opportunity for golfers of all levels to either hone their skills or enjoy the sport without committing to a full game. The irrigation and vegetation management that would be implemented under the proposed action would result in the long-term upkeep of the tees, fairways, and greens, which would provide a pleasant experience for users of the golf course, both in terms of playability and visual appearance. Limited lighting improvements would allow for extended evening play and may improve visitor comfort and safety when using the course facilities that would be lit in the evenings.

Golfers would be able to circulate through the course on wider, appropriately surfaced cart paths under the proposed action. These paths would provide a clear, comfortable circulation route that facilitates easy progression throughout the course. Non-golfer pedestrians would be able to experience the course via the proposed ecological trail. This would separate golf cart and pedestrian uses to separate circulation routes, limiting potential conflicts and inconvenience that occurs along the narrow path under the existing conditions. The ecological trail would provide non-golfers with new opportunities for recreation such as nature viewing and walking or jogging. The proposed natural meadows would enhance these opportunities for nature viewing by providing new habitats for plant species, pollinators, and other wildlife.

Under the proposed action, the golf course would be more accessible to a variety of users. Visitors to the golf course would continue to be able to arrive by vehicle along the entrance road, but pedestrians and cyclists would be able to enter the golf course separated from vehicular traffic via the proposed multiuse path. The proposed fully accessible walkways between key facilities of the site would allow visitors of various abilities to better utilize the proposed golf course amenities. In addition, the entrance to the golf course would be more welcoming to visitors with the removal of the existing maintenance building from the immediate viewshed of the entrance road.

The new amenities under the proposed action would improve the overall experience for golfers and provide new recreational opportunities for non-golfers. The new clubhouse would better serve visitors by offering a range of food services, a pro shop, and areas for indoor practice and community use. Because it would be fully accessible, visitors of all abilities would be able to use and enjoy the amenities. The clubhouse would also facilitate access to the driving range for people of all abilities via a fully accessible

connection. Visitors would also have the opportunity to hold outdoor community events in the open-air pavilion while having some shelter from the sun and elements. Golfers and non-golfers would have the opportunity to participate in recreational activities supported by the clubhouse without needing to commit to playing a round of golf on the course.

Implementation of the proposed action would result in temporary impacts to visitor use and experience during construction. All or portions of the golf course would be closed to visitors and golfers during construction, resulting the loss of recreational opportunities during that time. Additional impacts to visitor use and experience would occur due to the noise and visual presence of construction equipment and activities during implementation, which may intrude on visitor enjoyment of the golf course and facilities. Construction activities are anticipated to be undertaken in two phases: phase one would focus on the entrance, parking lot, clubhouse, putting green, and driving range while phase two would focus on the redesign of the golf course itself. Phasing of construction would minimize adverse impacts to visitor use by potentially allowing portions of the golf course and its amenities to remain open to visitors during construction. Though there would be adverse impacts to visitor use and experience related to construction activities under the proposed action, these impacts would be temporary and only last the duration of construction.

Cumulative Impacts

There are no past, present, or reasonably foreseeable actions that would affect visitor use and experience within Rock Creek Park Golf Course; therefore, the alternatives would not contribute to any cumulative impacts to visitor use and experience.

Conclusion

Under the no-action alternative, visitor use and experience would be relatively unchanged from the existing conditions. While vegetation management may somewhat improve the playability and views throughout the golf course, these benefits would be limited to specific areas and may not be discernible to all visitors. Overall, the no-action alternative would result in a continuation of the status-quo, including the ongoing experience of a golf course in need of maintenance and lacking in facilities.

Under the proposed action, the visitor experience would be greatly improved through the well-maintained, parkland-style course that would provide play opportunities for golfers of all skill levels. Both golfers and non-golfers would be welcomed and able to participate in recreational activities at the clubhouse, the driving range, the community pavilion, and the ecological trail that provide experiences outside of a round of golf. Improved access for pedestrians and cyclists into the golf course would allow visitors from the local community a safer and more enjoyable access to the golf course without using a motor vehicle. Overall, the proposed action would not only provide an improved visitor experience for golfers, but it would also provide a variety of new experiences for different types of users, including non-golfers. The proposed action would result in an overall beneficial impact to visitor use and experience.

ADJACENT COMMUNITIES

Affected Environment

Located along the eastern edge of Rock Creek Park, the golf course is surrounded to the north, west, and south by forested areas and other park features such as picnic areas, stables, and trails. East of the golf

course is 16th Street NW which serves as a main thoroughfare and connection point to residential neighborhoods just outside of the park. The Brightwood community in this area is comprised of a mix of apartment buildings, semi-detached homes, and single-family homes. Joyce Road NW, which serves as the main entrance into the golf course, originates from 16th Street NW. West of the golf course, on the other side of forest stands, Beach Drive NW follows the perimeter edge of the park and connects to Bingham Drive NW and Military Road NW to the south. These roads lead to neighborhoods in the Upper Chevy Chase community. Within these adjacent communities are a number of schools and places of worship.

Neighborhoods and residences immediately adjacent to the edge of the park tend to experience a more serene and natural setting than other, more urban locations within Washington, DC. For example, the Brightwood community along 16th Street NW is made up of low- and moderate-density neighborhoods, with a park-like ambiance and open spaces. Dense vegetation in some areas offers a natural environment for residents and can also serve as a buffer for noise or light from the golf course.

16th Street NW and Military Road NW, which border the golf course to the east and south, experience moderate to heavy traffic during weekday rush hour. Joyce Road NW, which also runs along the golf course's southern border, allows park visitors to access the golf course. It also serves in part as a route for commuters going between 16th Street and Military Road NW. Beach Drive NW, which is on the golf course's western border, is closed to through vehicle traffic. Most visitors access the golf course via motorized vehicle (the current parking lot provides 125 spaces) and access to pedestrians and bicyclists is limited. Some residents visit the golf course to walk along these existing golf course cart paths (which also currently serve as a pedestrian foot path and access for maintenance vehicles) to enjoy the parklike setting of the golf course as described under the "Visitor Use and Experience" topic above.

Impact Assessment Methodology

Potential impacts to adjacent communities are assessed based on changes to the way local communities experience their surrounding environment and how the alternatives would alter their experiences based on introducing new elements within their vicinity. Generally, impacts were assessed for communities in the area immediately surrounding the golf course, within approximately a one-mile radius of the course. The current condition of adjacent communities, as presented under the "Affected Environment" section above, were compared with the alternatives described in chapter 2 to determine the impacts to adjacent communities.

Impacts of Alternative 1: No Action

Under the no-action alternative, there would be no new impacts to adjacent communities, and conditions at the golf course would remain generally the same as existing conditions with some as-needed improvements. Rush hour traffic in the area would continue, and Joyce Road NW would remain as an alternative route to relieve some of this traffic. Residents from adjacent communities would continue to visit the golf course both to golf and to recreate (as described under the "Visitor Use and Experience" topic). First Tee of Greater Washington would continue to offer programming for local youth but the golf course would not serve as the headquarters for the organization.

The golf course's lightscape and soundscape would remain serene and natural, causing no impacts in areas outside of the golf course. Although the no-action alternative would involve occasional vegetation maintenance and non-native invasive plant species removal as needed, this would not substantially alter the density of the buffer that existing vegetation provides.

Impacts of Alternative 2: Proposed Action (Preferred Alternative)

Under the proposed action, the golf course would be rehabilitated, which would involve landscape construction and tree clearing activities in nearly all areas of the course. In addition, the existing clubhouse and maintenance buildings would be demolished, and new facilities—clubhouse, pavilion, driving range, cart barn, and maintenance building—would be constructed. These activities could cause disruptive sounds to adjacent communities, resulting in a short-term adverse impact to the existing soundscapes that these communities experience. However, clearing would be limited to the minimum amount needed to rehabilitate the golf course and construction would abide by local ordinances and thereby not produce excessive sound or be undertaken outside of the city’s quiet hours.

Once construction was complete, there would be beneficial impacts to adjacent communities from the rehabilitation. Establishment of an ecological trail would enhance the natural environment and would improve the opportunities for local residents and other visitors to continue walking the course and enjoying the unique park vistas. The inclusion of a new multiuse path along Joyce Road NW and up to the golf course entrance would also improve access for adjacent communities by expanding the ways in which nearby residents could safely access the course (e.g., multimodal transportation). The addition of a picnic/events pavilion at the clubhouse could also benefit adjacent communities by providing a nearby scenic venue to host various gatherings and events throughout the year. Expanding programming space for First Tee of Greater Washington would also allow the organization to further its mission and potentially reach more youth in the community, which would be a benefit for residents of adjacent communities.

The rehabilitated course and facilities also have the potential to draw more visitors once the changes are completed. This could lead to additional traffic traveling along 16th Street NW as vehicles make their way to the golf course entrance at Joyce Road NW. Increased traffic along 16th Street NW, especially during rush hour if visitors come to the course at the end of the day, could result in additional traffic congestion in the area. In addition, constructing the new maintenance building along the east side of Joyce Road NW would result in the heavier use of this road by maintenance vehicles. This could introduce an adverse impact to adjacent communities should local residents use this road as an alternative route between Military Road NW and 16th Street NW.

Under the proposed action, external facility lighting would be added in specific areas, including the clubhouse, maintenance building, and parking lot areas. This new lighting would be compliant with the DarkSky Approved program (i.e., certified by the International Dark-Sky Association) and would only be lit at certain times, for safety reasons. Lighting during nighttime operations would be limited to what is necessary around structures for security purposes. Lighting would also be added to select areas of the golf course including the new driving range and the practice greens near the clubhouse. This lighting at the driving range would be minimized to only 50 yards, which would not impact adjacent communities, as the nearest residence in this area (along 16th Street NW, just south of Tuckerman Street NW) is approximately 240 yards from the proposed driving range location. Similarly, the areas proposed for the 9-hole regulation course (long course) and 9-hole par 3 course (short course) are situated in locations that are far enough from nearby residences that any light cast would be indiscernible. Adjacent communities to the east of the course, along 16th Street NW, would be too far from the lights to notice any disturbance; adjacent communities to the west of the course are even further in distance from the lighting and are separated by nearly a half mile of dense forest vegetation which would further block any nuisance lighting. In addition, lighting would be timed appropriately so that areas are only lit when necessary. Lighting would be off late at night when the course is closed.

Cumulative Impacts

In addition to the impacts of rehabilitating the golf course and associated facilities, other past, present, and reasonably foreseeable actions may affect adjacent communities within the project area, including the development and zoning plans in the city's 2021 Comprehensive Plan. These actions could cause long-term adverse impacts to adjacent communities in the future by potentially increasing traffic in the area if plans to develop a mixed-use neighborhood ultimately becomes a major commercial and institutional employment center. The development project could also result in long-term beneficial impacts to adjacent communities by providing new job opportunities for residents. Similarly, communities to the west of the golf course may also see growth and development in the coming years, which could add new housing to the area and may increase future traffic on roads just outside of the park. Past development has also negatively impacted communities adjacent to the golf course, eroding the edges of parks and diminishing water quality and scenic views. In addition to actions in the city's Comprehensive Plan, the recently adopted Upper Beach Drive Management Plan may introduce impacts to communities adjacent to the golf course. The closure of parts of upper Beach Drive NW would shift traffic to adjacent roads, thereby increasing traffic in residential neighborhoods (NPS 2022c) and resulting in an adverse impact. However, mitigation measures would be implemented to minimize delays, improve safety, and discourage speeding in these communities (NPS 2022a). The closure of upper Beach Drive NW would also provide some benefit to adjacent communities by offering more recreational opportunities for residents who live close to that area of the park.

The golf course rehabilitation elements under the proposed action would contribute an adverse increment to the cumulative impact to adjacent communities by increasing noise during construction activities, potentially increasing traffic in the area, and adding lighting elements to an otherwise serene environment. However, these impacts would be short-term or intermittent. Due to the short-term or intermittent duration of these impacts, as well as the beneficial impacts of the intended development in the 2021 Comprehensive Plan, combined with the beneficial impact of the proposed action (by improving access, adding event space, and expanding youth programming), the overall cumulative impact to adjacent communities would be beneficial by providing new opportunities for residents.

Conclusion

Under the no-action alternative, the golf course would remain in its current condition, resulting in no new impacts to adjacent communities in the area. Under the proposed action, adjacent communities would experience some benefit, including the availability and use of the proposed ecological trail. Adjacent communities would also benefit from the addition of the picnic/events pavilion, which would provide a nearby venue for gatherings and special events, as well as the expanded programming space for the youth organization, First Tee of Greater Washington.

Under the proposed action, the golf course rehabilitation could introduce adverse impacts to adjacent communities through potential sounds caused during demolition and construction activities; increased traffic in the area due to a rise in popularity for the improved course; and new lighting in an area which is an otherwise serene nighttime environment. However, noise impacts would be temporary during the construction phase and would cease once the course rehabilitation was complete. Similarly, the increased traffic would be intermittent and not a constant nuisance. Finally, proposed new lighting would be far enough from residences in adjacent communities to cause any noticeable light pollution or bothersome effects.

Therefore, when considered with the long-term beneficial impacts from the ecological trail and facility improvements, the proposed action would result in an overall beneficial impact to adjacent communities.

Other past, present, and reasonably foreseeable projects (i.e., the city's Comprehensive Plan and the Upper Beach Drive Management Plan) would introduce both adverse and beneficial impacts to adjacent communities, in combination with the impacts of the proposed action. Adverse traffic impacts from these projects would be short-term or intermittent, however, and in some cases, would be mitigated (e.g., the closure of upper Beach Drive NW would include mitigation measures for adjacent roadways). The beneficial impacts from these past, present, and reasonably foreseeable projects, combined with the beneficial impacts of the proposed action, would result in an overall beneficial impact to adjacent communities.

CHAPTER 4: CONSULTATION AND COORDINATION

The NPS places a high priority on public involvement in the NEPA process and on giving the public an opportunity to comment on the proposed action. Consultation and coordination with federal, state, and local agencies, and American Indian tribes were also conducted to refine the alternatives and identify issues and/or concerns related to environmental impact topics. This section provides a summary of the public involvement, and agency consultation and coordination that occurred during planning.

PUBLIC INVOLVEMENT

As part of the NEPA process and to comply with the requirement of Section 106 of the NHPA, the NPS involved the public in project scoping by holding a 30-day public comment period from January 9, 2023, to February 8, 2023. A virtual public scoping meeting was held on January 26, 2023, using the Zoom virtual meeting platform. The NPS communicated project information with the public, agencies, and other relevant stakeholders during scoping by transmitting scoping letters and a press release by email. The scoping letter was distributed by the NPS to the interested parties on January 3, 2023. The NPS prepared a press release that was sent to local media outlets on January 9, 2023 and uploaded to NPS press release webpages. The presentation used during the virtual public meeting and a recording of the meeting are available at: <https://parkplanning.nps.gov/rockcreekgolfplan>

During the public scoping period, comments received covered a wide range of topics, including the project purpose and need; elements of existing alternatives; other alternatives; and issues related to adjacent land, vegetation, wetlands and riparian areas, lightscapes, wildlife, erosion/stormwater, and visitor use and experience.

The public will have a second opportunity to comment during public review of the EA from September 25, 2023, to October 25, 2023. Responses to comments will be addressed in the decision document. The EA will be re-circulated for additional public comment if substantial changes are made in response to comments.

The external Planning, Environment, and Public Comment (PEPC) homepage for the project, <https://parkplanning.nps.gov/rockcreekgolfplan>, is the primary location to make project documents available for public review.

AGENCY CONSULTATION AND COORDINATION

NEPA Cooperating Agency Invitation

An agency (federal, state, local, or tribal government) is eligible to become a cooperating agency during the development of an EA if it has jurisdiction by law over actions included in a NPS proposal or alternatives under consideration, or special expertise regarding environmental issues related to a NPS proposal or alternatives under consideration (40 CFR 1508.5). The NPS transmitted one cooperating agency invitation letter to the NCPC on July 22, 2022.

National Historic Preservation Act, Section 106

Pursuant to Section 106 of the NHPA and its implementing regulations (36 CFR Part 800) “Protection of Historic Properties,” the NPS initiated Section 106 consultation with the District of Columbia on July 22, 2022.

The first Section 106 consulting party meeting was held virtually on March 2, 2023, using the Microsoft Teams platform, and included a presentation of the APE, existing conditions, and initial proposed concept. A second consulting party meeting was held virtually on July 24, 2023, using the Microsoft Teams platform, to review the draft assessment of effect and memorandum of agreement outlining all minimization and mitigation efforts of adverse effects to historic resources. Section 106 consultation letters and responses are provided in appendix B.

A separate assessment of effect under Section 106 was prepared concurrently with this EA. The DC HPO will be reviewing the NPS finding of an adverse effect on historic properties concurrent with the public review of this document. The NPS, in coordination with NLT, will consult with the DC HPO and relevant consulting parties during the next step of the Section 106 compliance process for this project, signature of the memorandum of agreement. The Section 106 process for this project will be completed prior to the NPS signing a decision document.

Tribal Consultation

Consultation initiation letters were sent to the following tribes on July 22, 2022:

- Absentee Shawnee
- Catawba
- Chickahominy
- Chickahominy Eastern Division
- Delaware Nation of Oklahoma
- Delaware Tribe
- Eastern Shawnee of Oklahoma
- Upper Mattaponi
- Monacan
- Nansemond
- Pamunkey
- Rappahannock
- Shawnee

To date, NPS has not received any responses from tribes that were contacted.

Endangered Species Act, Section 7 Consultation

The NPS has initiated informal consultation with USFWS under Section 7 of the Endangered Species Act for this project. The NPS requested technical assistance from USFWS on January 3, 2023, and met with USFWS staff on site to review the proposal. The USFWS provided additional resource-specific inquiries and recommendations for avoidance measures and best practices on February 8, 2023 (USFWS, Cullen, pers. comm., 2023). The NPS anticipates further Section 7 engagement as plans for the project move through the design process.

PUBLIC REVIEW

The EA will be released for formal public and agency review for 30 days and has been distributed to a variety of interested individuals, agencies, and organizations. It also is available on the internet at <https://parkplanning.nps.gov/rockcreekgolfplan>, and hard copies are available by request.

REFERENCES

DarkSky International

- 2023 “DarkSky Approved.” Available online at <https://darksky.org/what-we-do/darksky-approved/>, accessed August 4, 2023.

District of Columbia Commission on Climate Change & Resiliency (DC-CCCR)

- 2022 Accelerate, Anticipate, Empower: The Second Report of the District of Columbia Commission on Climate Change & Resiliency. Washington, DC. Available online at https://climatecommission.dc.gov/sites/default/files/dc/sites/climatecommission/page_content/attachments/DC-CCCR_Final%20Report%2011.16.2022.pdf, accessed June 6, 2023.

District of Columbia Department of Energy and Environment (DOEE)

- 2015 *District of Columbia Wildlife Action Plan 2015: A Conservation Strategy for Washington, DC*. Available online at <https://doee.dc.gov/service/wildlifeactionplan#:~:text=DOEE%20updated%20its%20Wildlife%20Action,conservation%20need%20and%20their%20habitats,> accessed June 27, 2023.

District of Columbia Office of Planning

- 2021a The Comprehensive Plan for the National Capital District Elements, Chapter 22: Rock Creek East Area Element. Available online at https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/22_RCE.pdf, accessed June 8, 2023.
- 2021b The Comprehensive Plan for the National Capital District Elements, Chapter 23: Rock Creek West Area Element. Available online at https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/23_RCW.pdf, accessed June 8, 2023.

National Park Service (NPS)

- 2023a National Park Service Visitor Use Statistics, YTD Report for Rock Creek Park. Online database available at <https://irma.nps.gov/Stats/SSRSReports/Park%20Specific%20Reports/Park%20YTD%20Version%201?Park=ROCR>, accessed June 1, 2023.
- 2023b NPSpecies - The National Park Service biodiversity database: Ozone Sensitive Species in Rock Creek Park (ROCR). Online database available at <https://irma.nps.gov/NPSpecies/Reports/Shared/Ozone-sensitive%20Species%20in%20a%20Park/ROCR>, accessed June 6, 2023.
- 2023c Species Checklist for Rock Creek Park (ROCR). Online database available at <https://irma.nps.gov/NPSpecies/Reports/SpeciesList/Species%20Checklist/ROCR/1,2,4,5/false>, accessed August 30, 2023.

- 2022a *Finding of No Significant Impact: Upper Beach Drive Management Plan/Environmental Assessment, Rock Creek Park.* November 1, 2022.
- 2022b “Forest Regeneration 2022.” National Capital Region, Inventory & Monitoring Network. Available online at <https://www.nps.gov/articles/000/forest-regeneration-2022.htm>, accessed June 6, 2023.
- 2022c *Upper Beach Drive Management Plan Environmental Assessment.* July 2022.
- 2021a Air Quality Conditions & Trends: Rock Creek Park. Online database available at <https://www.nps.gov/subjects/air/park-conditions-trends.htm>, accessed June 6, 2023.
- 2021b Wildlife and Climate Change. Available online at <https://www.nps.gov/articles/000/wildlife-climateimpact.htm#:~:text=Rising%20temperatures%20lower%20many%20species,our%20National%20Capital%20Area%20parks>, accessed August 25, 2023.
- 2019a *Cultural Landscape Report: National Park Service Golf Courses in the District of Columbia – East Potomac Park, Langston, and Rock Creek: Treatment Guidelines.* Washington, DC.
- 2019b Rock Creek Park Birds. Available online at <https://www.nps.gov/rocr/learn/nature/birds.htm>, accessed August 31, 2023.
- 2019c Coyotes. Available online at <https://www.nps.gov/rocr/learn/nature/coyotes.htm>, accessed September 21, 2023.
- 2018 Air: Ozone Effects on Tree Growth. Available online at <https://www.nps.gov/subjects/air/nature-trees.htm>, accessed June 6, 2023.
- 2017 Cultural Landscape Inventory, Rock Creek Golf Course, Rock Creek Park. Washington, DC.
- 2015 *Foundation Document: Rock Creek Park, District of Columbia.* September 2015.
- 2011 *Final White-Tailed Deer Management Plan Environmental Impact Statement.* Washington, DC. December 2011.
- Play DC Golf
- 2023 “Rock Creek Park Golf Course.” Available online at <https://playdcgolf.com/rock-creek-park-golf/>, accessed June 2, 2023.
- US Department of Agriculture (USDA)
- 2018 *Wild Turkeys.* Wildlife Damage Management Technical Series. Animal & Plant Health Inspection Service, Wildlife Services. January 2018.
- 2020 *Coyotes.* Wildlife Damage Management Technical Series. Animal & Plant Health Inspection Service, Wildlife Services. November 2020.

US Fish and Wildlife Service (USFWS)

- 2023a “Endangered and Threatened Wildlife and Plants; Review of Species That Are Candidates for Listing as Endangered or Threatened; Annual Notification of Findings on Resubmitted Petitions; Annual Description of Progress on Listing Actions” 88 *Federal Register*, no. 2023-13577: 41560-41585. June 27, 2023.
- 2023b Northern Long-eared Bat. Available online at <https://www.fws.gov/species/northern-long-eared-bat-myotis-septentrionalis>, accessed August 31, 2023.
- 2023c Tricolored Bat. Available online at <https://fws.gov/species/tricolored-bat-perimyotis-subflavus>, accessed August 31, 2023.
- 2022 “Service finalizes recovery plan for endangered amphipod found only in D.C.” August 19, 2022. Available online at <https://www.fws.gov/press-release/2022-08/service-finalizes-recovery-plan-endangered-amphipod-found-only-dc>, accessed September 21, 2023.
- 2021 *Draft Recovery Plan for the Hay’s Spring Amphipod (stygobrous hayi)*. North Atlantic-Appalachian Region, Hadley, Massachusetts.
- 2006 “Threatened and Endangered Species: Indiana bat (*Myotis sodalis*)” fact sheet. Fort Snelling, Minnesota. Revised December 2006.
- 2004 Public scoping comment from Kathleen Cullen, Endangered Species Biologist, in a public scoping comment submitted to NPS (February 8, 2023), regarding how the project may impact federally listed species found within or adjacent to the project area.

**APPENDIX A: DRAFT PUBLIC COMMENT
ANALYSIS REPORT**

This page intentionally left blank.

National Park Service
US Department of the Interior

Rock Creek Park
Washington, DC



Golf Course Rehabilitation

Rock Creek Park

Draft Public Comment Analysis Report

March 2023

This page intentionally left blank.

CONTENTS

Contents.....	i
Introduction	2
Public Outreach for the Golf Course REhabilitation	2
Definition of Terms	2
Method of Comment Analysis.....	3
Concern Report.....	4
Attachment A: Letter to Interested Parties.....	A-1
Attachment B: Virtual Meeting Presentation	B-1

INTRODUCTION

This report describes the public scoping that the National Park Service (NPS) conducted between January 9 and February 8, 2023, for the Rock Creek Park (the park) Golf Course Rehabilitation project, including an analysis and summary of public comments received. Public scoping is conducted early in the National Environmental Policy Act (NEPA) planning process and is the process by which the National Park Service solicits public input on the scope of issues and alternatives to be addressed in a NEPA document, such as an environmental assessment (EA). This public scoping process provided an opportunity for the National Park Service to solicit early public input on values, issues, and ideas to be considered during project planning. After the public scoping period ended, the National Park Service used an established protocol to analyze and summarize the public comments received.

PUBLIC OUTREACH FOR THE GOLF COURSE REHABILITATION

A letter notifying interested parties of a public scoping comment period was distributed on January 3, 2023. A news release was also distributed via email on January 9, 2023. The comment period was open for 30 days, through February 8, 2023 (see attachment A for a copy of the letter to interested parties). During this comment period, the National Park Service shared information about the purpose of and need for the project, the proposed action, and the project goals. The National Park Service requested public input on the rehabilitation design and project impacts that should be considered during the planning process.

A public meeting was held virtually during the open public comment period, on Thursday, January 26, 2023, from 6:30 – 8:00 p.m. EST. A total of 57 individuals attended the meeting (excluding NPS staff in attendance). The meeting was conducted using the Zoom Webinar platform. A call-in number was also available for people to attend by phone. The meeting began with NPS introductions and webinar logistics. Following a brief PowerPoint presentation was a Question and Answer (Q&A) session during which participants could submit a question through a Q&A box, where it was read aloud and addressed by the NPS team, or via the “Raise Hand” tool (which was also available via phone), where they were called on to provide verbal questions. See attachment B for a copy of the presentation given during the meeting. Participants were reminded that questions and comments submitted during the webinar would not be considered formal comments on the project and were encouraged to provide comments electronically via the NPS’s Planning, Environment, and Public Comment (PEPC) system.

During the open comment period, 87 pieces of correspondence were received and entered into the PEPC system. The PEPC system serves as a database where the National Park Service can analyze and summarize public comments.

DEFINITION OF TERMS

Primary terms used in this document are defined below.

Correspondence: A piece of correspondence is the entire document received from a commenter. This includes letters, emails, comments entered directly into PEPC, and any other written comments provided either by postal mail or in person at the park.

Comment: A comment is a portion of the text within a correspondence that addresses a single subject. It could include information such as an expression of support or opposition for a project, additional data regarding the existing condition, or suggestions for actions to be considered.

Code: A category or grouping centered on a common subject. The codes were developed during the planning process and were used to track major subjects. Each comment is assigned at least one code.

Concern: Concerns are statements that summarize the issues and ideas identified by each code. Each code was further characterized by concern statements to provide better focus on the content of comments. Some codes required multiple concern statements.

METHOD OF COMMENT ANALYSIS

As stated above, 87 pieces of correspondence were received during the public scoping period. Correspondence was entered directly into the internet-based PEPC system.

Once all the correspondence was entered into PEPC, each was read, and specific comments within each correspondence were identified.

For categorization purposes, each comment was given a code to identify the general content of a comment and to group similar comments together. A total of 14 codes were used to categorize the public comments received. Table 1 below lists the codes used and their descriptions. In some cases, the same comment may be categorized under more than one code, reflecting the fact that the comment may contain more than one issue or idea.

Table 1. Codes Used for this Project

Code and Title	Description
PN 0100	Purpose and Need
AL 0100	No Action
AL 0200	Proposed Action
AL 0210	Proposed Action: Golf Course Rehabilitation Elements
AL 0220	Proposed Action: Entrance and Clubhouse Elements
AL 0230	Proposed Action: Other Suggestions
AL 0300	Other Alternatives
IS 0100	Issues: Adjacent Land
IS 0210	Issues: Vegetation
IS 0220	Issues: Wetlands and Riparian Areas
IS 0300	Issues: Lightscapes
IS 0400	Issues: Wildlife

Code and Title	Description
IS 0500	Issues: Erosion/Stormwater
IS 0600	Issues: Visitor Use and Experience

CONCERN REPORT

Below, a list of concern statements organized by code is provided to summarize the comments received during the public comment period for the proposed golf course rehabilitation.

PN 0100: PURPOSE AND NEED

Some commenters did not support the non-golfer objective in the project purpose and need statements due to concerns that errant golf balls could be unsafe for non-golfers using the proposed trails and that these users could be distracting to those playing golf. Another commenter noted that the project purpose and need statement should also acknowledge the need to provide pedestrian and bicycle access since the course is currently only accessible by vehicles.

AL 0100: NO ACTION

Some commenters expressed opposition to rehabilitating the golf course, stating that public lands should be used for more inclusive activities and not for an exclusive use such as golf. Specific concerns regarding impacts on park resources, visitor use and experience, and adjacent land are captured under their respective codes below.

AL 0200: PROPOSED ACTION

Some commenters supported the golf course rehabilitation. Generally, commenters supported the rehabilitation because it provides additional opportunities for the broader community (both golfing and non-golfing) to interact with and enjoy the golf course and the park. Commenters were appreciative of rehabilitating the golf course as a means of preserving public open space while also preserving land.

Suggestions for specific elements or features of the golf course and entrance/clubhouse rehabilitation design are captured under codes AL 0210 and AL 0220 below.

AL 0210: PROPOSED ACTION: GOLF COURSE REHABILITATION ELEMENTS

Some commenters provided suggestions for specific elements or features of the golf course rehabilitation design. These elements are detailed below:

- Design of the proposed meadow should consider:
 - Reduce the course to just 9 holes and restore the remaining holes to create the proposed pollinator meadows.
 - Instead of creating isolated meadow habitat throughout, native meadow should be restored and distributed throughout the golf course to provide a habitat corridor for pollinator species and migratory birds.
 - A commenter provided specific site preparation methods to ensure the health and vitality of the meadow habitat.

- Netting should be considered near the driving range to ensure the safety of people and cars in the vicinity.
- Design of the irrigation pond should consider:
 - Whether stormwater alone is adequate to keep the pond full (e.g., during dry periods) or whether city water may be needed as a supplemental source.
 - Evaporation loss, the lack of a substantial watershed (standard practice is to have a watershed 5-30 times the size of the pond area itself), and the need for a minimum water level for a balanced pond ecosystem may leave little water available for irrigation.
 - Safety elements such as fencing to keep people and animals out of the pond and whether the proposed location will allow it to be an undisturbed natural area. A commenter also questioned the purpose of the pump house and encouraged thoughtful design of irrigation infrastructure on the course.
 - Moving the pond to the north side of the driving range or an area near the Hole 7 T-boxes where it could receive runoff from a larger uphill surface area. If there is a spring-fed water source in the area, it may be more effective to install a smaller pond here than the currently proposed location, while also including an underground cistern.
 - Supporting frog, salamander, turtle, and snake habitat.
- Design elements should be sustainable and should aim to mitigate the park's carbon footprint and amount of pollution; elements should also be able to withstand and adapt to the effects of climate change such as greater weather extremes and rainfall events. Such elements might include:
 - Renewable energy (e.g., solar panels)
 - Electric golf carts and electric tools
 - Addressing drainage, water collection and irrigation issues with raingardens, bioswales, and cisterns
 - Environmentally sensitive operations and management of turf; phasing out and/or limiting the use of most fertilizers, pesticides, herbicides, and fungicides to reduce pollutants; removing invasive plants manually where possible
 - Incorporating stormwater controls throughout the design
- Vegetation
 - Grass treatments should be limited to areas directly around holes; other areas should be left as natural as possible. Avoid using invasive and non-native plantings. Use native grasses for turf and other native vegetation for edge communities along the forest.
 - Grass conditions currently render some parts of the course unplayable and need to be weeded and have encroaching trees removed.
 - Limit the number of trees removed in the historical fairway and plant as many replacement trees as possible. Avoid first cutting any trees within the riparian buffer (100 feet of the stream). If it must occur, replant the buffer.
 - Plant a vegetated riparian buffer between the wetland and the green to protect the headwater wetland and Rock Creek from runoff. Also plant native

vegetation along the stream segment downstream of the ponded wetland (Hole 8) to establish a vegetated riparian buffer that will filter runoff.

- Trail design
 - Should limit the construction of new trails and avoid expanding the footprint of current ones.
 - Should take into account elements such as difficult terrain and proximity to other trails in the park.
 - Should consider that there are long established paths already; perhaps formalizing these should be built into the design. Or, if new trails must be developed, decommission and make the old trails inaccessible.
 - A simple loop circuit (with minor connecting paths) around the golf course could provide easier circulation than multiple secondary trails; this could also help ensure unwanted detours in areas that are reserved for golf.
 - Including larger and smaller trail loops is desirable.
 - Cultivating an edge habitat along the perimeter of the trail may discourage pedestrians from leaving the trail and creating social trails.
 - Should take into account formal connections with the nearby Valley Trail that involve minimal disturbance.
- Cart paths should observe the latest low-impact development methods such as drainage techniques, permeable pavers, and avoiding asphalt and cement in favor of natural substrate and crushed rock fines.
- Rehabilitation efforts should be timed to avoid impacts to the northern long-eared bat; a lighting plan should also be developed as part of the project.
- There is opportunity to add additional ponds, wetlands, and vernal pools into the current design to enhance rare amphibian and wetland habitat.
- Slopes should be considered for the golf course routing and design. Utilizing varying contour can make short courses more interesting but slopes too steep can render a hole unplayable.

AL 0220: PROPOSED ACTION: ENTRANCE AND CLUBHOUSE ELEMENTS

Some commenters provided suggestions for specific elements or features of the golf course entrance and clubhouse design. These elements are detailed below:

- Parking should be sufficient to handle all types of users, especially during peak season.
- Some commenters considered the 100 proposed parking spots too many for the course and suggested that the design instead focus on having the golf course reachable via public transportation. Other commenters suggested the parking lot be split up into one smaller lot near the clubhouse and an overflow lot near the maintenance building, in order to be less environmentally intrusive.
- Include bird-safe design in the new and renovated structures (e.g., special glass to reduce collisions, limit interior lighting at night, and shield external lighting to limit vertical light emissions at 90 degrees).
- Rehabilitation efforts should be timed to avoid impacts to the northern long-eared bat; a lighting plan should also be developed as part of the project.

- Design elements should be sustainable and should aim to mitigate the park’s carbon footprint. Elements should also be able to withstand and adapt to the effects of climate change such as greater weather extremes and rainfall events. Such elements might include:
 - Solar panels on the new clubhouse roof and maintenance shed, as well as a solar panel shade over the parking lot
 - Electric golf carts and electric tools
 - Pursuing Leadership in Energy and Environmental Design (LEED) certification for buildings
 - Installing electric car charging stations in the parking lot
 - Reusing existing materials from this site or other NPS or DC redevelopment projects
 - Incorporating stormwater controls throughout the design such as the addition of rain gardens for impermeable surfaces like the parking lot or replace these surfaces with permeable pavers. Also consider bioswales and channeling runoff into the rain gardens or a cistern system.
- The new maintenance building should not be built in its proposed location on Joyce Road, as this road will not adequately support the heavier use of maintenance vehicles. This road is also an important alternative route that helps reduce congestion between Military Road and 16th Street NW, which are major thoroughfares; maintenance vehicles on Joyce Road would result in another choke point.
- The accessible path along Joyce Road should be a minimum of 10 feet to safely serve pedestrians and bicyclists. 10 bicycle racks should be included at the main entrance and 5 racks at the Underwood St. NW entrance.

AL 0230: PROPOSED ACTION: OTHER ALTERNATIVES

Some commenters offered suggestions for additional elements of the design for the National Park Service to consider, other than those already proposed. These new design elements are detailed below:

- Consider including a small playground area at the clubhouse.
- Instead of including an open-air irrigation pond, capture rainwater from new impervious surfaces and store it in an underground cistern, which has numerous advantages over a pond.
- The construction of a catchment basin should be prohibited because it will threaten water quality if compromised.
- Consider adding a bioretention facility near the parking lot to capture and treat stormwater.
- Consider alternatives to tree removal in the design of the new facilities.
- Add and maintain houses for the eastern bluebird and bats, to support biodiversity and natural insect control.
- Maintaining the existing 18-hole course is preferable to the proposed 9-hole regulation course and 9-hole par 3 course.

AL 0300: OTHER ALTERNATIVES

Some commenters offered additional alternative suggestions that were outside the scope of this project, including other uses for the project area, course play rules, and golf course management and operations (such as open/close times). Suggestions include:

- Operating the golf course year-round.
- Allowing some holes to permit frisbee golf and establishing a disc golf course in addition to the regulation golf course.
- The course is not an appropriate space for a dog park but establishing one nearby could be a mitigation measure offered by NLT.
- Different hours of access in different parts of the park could be confusing to visitors.
- Additional mitigation could expand invasive removal efforts beyond those areas directly in NLT's control, offering financial support to the park to underwrite invasive removal.
- The revenue from the rehabilitated golf course should be reinvested in improvements to the park.
- As new maintenance vehicles are purchased, they should only be electric vehicles.
- If having to clear natural areas is the only way to make the golf course sustainable, then it should be closed and serve as a laboratory and study site in ecological restoration.
- The proposed built environment, including hiking and cart paths; the clubhouse; and maintenance shed, should not expand beyond the footprint of existing structures.
- The National Park Service and NLT should not attempt to restore the golf course to its original design but should instead adapt to current and future needs for the wildlife in the park. Protecting these species should be prioritized over golf expansion.
- NLT should consider expanding the driving range and beginner holes at the Langston Golf Course and East Potomac Park Golf Course instead of at Rock Creek Park Golf Course.
- Remove the man-made elements from the existing golf course and let nature reclaim the area or turn the whole property into a park.
- The project area would be better used for dense housing development.
- The National Park Service should invest more money in stream restoration, watershed health, and stormwater management in this rehabilitation.
- The Rock Creek Golf Course facility should also serve as an environmental conservation and educational facility that can help educate visitors about the importance of green approaches to golf course management, environmental sustainability and conservation, native species habitat enhancement, and watershed protection. The clubhouse could serve as an extension of The Nature Center.
- The golf course can serve as a location for local groups to teach youth training programs and to practice environmental conservation and climate change resiliency work.
- Incorporate a putting and chipping area in the golf course design.
- Repairs to existing safety hazards on the current course.
- If the Rock Creek Park Golf Course is rehabilitated, then one of the other NPS golf courses in DC should be returned to parkland.
- Consider how to generate funding for ongoing maintenance.

IS 0100: ISSUES: ADJACENT LAND

Some commenters expressed concern about impacts on land adjacent to the project area as a result of the rehabilitation elements. Specific concerns included those about lighting of the proposed driving range affecting nearby neighborhoods; the ecological trail extending beyond the lease boundary; and runoff negatively impacting the surrounding watershed.

Some commenters also noted opportunities from the rehabilitation, such as using the trail system as a potential connector to neighborhoods near the park that have fewer non-motorized access point to the park.

IS 0210: ISSUES: VEGETATION

Some commenters were concerned about potential impacts of the project on vegetation and, in some cases, potential impacts from vegetation on the project itself. Concerns included the following:

- The ecological trail will result in a loss of trees, forest fragmentation, and incursion of invasive species. Poor design (e.g., not connecting with existing trails to form connections providing sanctioned access points) of the ecological trail could also lead to the creation of social trails in the surrounding forest if users (or off-leash animals) further explore the area or take shortcuts, which will degrade forest health. The trail should be designed so that it does not adversely affect trees or lead to soil compaction.
- Invasive and non-native plants should be reduced throughout the course and in areas adjacent to the course. These can choke other trees and reduce the diversity of plant species. Plant removal should be manual whenever possible and fertilizers, herbicides, pesticides, and fungicides should be phased out. Native plants and grasses should be preserved and expanded throughout the course.
- Destroying trees is ill-advised, considering their ability to remove carbon dioxide from the atmosphere and the time it takes for new trees to mature to the point that they can perform this function on a large scale. Reducing the tree canopy may also lead to the expansion of turf which would require more irrigation and maintenance. Removing trees seems inconsistent with the park's dedication to preserving natural resources. If trees are removed, this loss should be mitigated.
- One commenter was concerned that the irrigation infrastructure would be placed in forested areas or in areas that would damage tree roots. Another commenter was concerned about the vegetation removed to establish a basin for the irrigation pond.
- The interface between the managed fairways and roughs should be approached in a way that demonstrates balance between golf course users and the Rock Creek Park Authorization Act that protects natural resources.
- Special Trees and Heritage Trees are protected by the District of Columbia Urban Forest Preservation Act.

IS 0220: ISSUES: WETLANDS AND RIPARIAN AREAS

Some commenters were concerned specifically about impacts to wetlands and riparian areas within the project area. Commenters suggested that a plan should be in place to minimize impacts to these areas from stray golf balls, that the ecological trail could negatively impact rare wetlands, and that deforesting riparian buffers around headwater streams reduces the function of the buffer. Commenters noted that wetlands and streams should be delineated in accordance with USACE procedures and recommended that the greens for Holes 5 and 6 in the Par 3 course be avoided because this is an emergent wetland and serves as important headwaters for a tributary to Rock Creek. They added that, in accordance with District wetland and stream regulations, only water dependent activities or those with no practicable alternative can receive a permit to impact

wetlands and streams. Even with a permit, the applicant must still avoid and minimize impacts to the greatest extent practicable and mitigation is required for unavoidable impacts.

IS 0300: ISSUES: LIGHTSCAPES

Some commenters expressed concerned about potential impacts on lightscapes from lighting associated with the project. Commenters value the clear, unobstructed view of the night sky at the golf course without nearby light pollution, noting it is one of the few areas in Washington, DC with dark skies. Commenters felt that the National Park Service should preserve night skies and not add lighting to a park that was previously unlit. One commenter noted that historically, the golf course was only open during daylight hours and that imitating this schedule would be in character with the original bucolic park setting. To reduce lighting impacts, some commenters suggested features such as light shields to direct lighting to the ground (e.g., such as safety lights needed at the clubhouse); turning off exterior and interior clubhouse lights after a certain point at night; allowing longer golf play during the summer when the sun is out for longer; and complying with the International Dark Sky Association's Criteria for Community Friendly Outdoor Sports Lighting.

IS 0400: ISSUES: WILDLIFE

Some commenters were concerned about potential impacts on wildlife from the project. Concerns included the following:

- Nighttime illumination of the driving range will adversely impact wildlife, disrupt migration patterns (the course is along the Mid-Atlantic Flyway), and has been proven especially detrimental to animals' reproductive behaviors.
- The unique varieties of fireflies near the current clubhouse will be negatively impacted when it is demolished and during golf course rehabilitation. There is also important firefly habitat near the Joyce Road area where the new maintenance building is proposed.
- Protecting and preserving all types of present natural habitats should be prioritized as part of the proposed rehabilitation plans (this also includes maintaining and safely moving existing birdhouses). Several species are known to be present at the course, including species of birds, amphibians, snakes, foxes, coyotes, and turkeys, as well as specific species of concern and the federally endangered Hays Spring amphipod and northern long-eared bat.
- The ecological trail itself and its potential to result in social trails could damage wildlife habitat (e.g., loss of tree canopy) and create habitat fragmentation (e.g., new forest edge). It also introduces humans, pets, and predators into these habitats. One commenter stated that the trail should be designed to preserve existing contiguous habitat.
- Pesticide, herbicide, fertilizer, and fungicide use should be limited to avoid negative impacts to wildlife both in the park and elsewhere in the watershed, where runoff has the potential to harm them.
- New buildings should consider bird strikes on windows, as many bird species use the park for respite during annual migrations. The proposed location of the pond occurs in prime winter birding location.
- The proposed irrigation pond should be fenced to prevent pets from disturbing salamanders, toads, and frogs. It should also not alter the hydrology of natural ponds in the project area.

- Trash and food waste from the new clubhouse should be carefully managed so as not to become an attractant for wildlife such as raccoons and opossums.

Other commenters also noted potential benefits to wildlife from the proposed rehabilitation. Potential benefits included the following:

- If woodland edge areas are planted with native grasses and plants, it can provide ample habitat for wildlife. Removing invasive species will help improve ecosystem health, including the health of native plants on which migratory birds depend for nutrition.
- Expanded meadow habitat would benefit many species found at the park, including pollinator species. The careful management of this meadow can help ensure year-round habitat for wildlife.
- The proposed irrigation pond could support frog, salamander, turtle, and snake habitat needs.

IS 0500: ISSUES: EROSION/STORMWATER

Some commenters expressed concern about erosion damage and stormwater management as a result of the proposed project. Concerns included the following:

- Streams in the project area have been destabilized from decades of outdated stormwater and turf management. This needs to be improved to stabilize the headwaters of Rock Creek and reduce sediment pollution to the downstream watershed. Pesticide runoff into Rock Creek is also a concern.
- Given the amount of impervious surface area that is being added to the course as a result of the rehabilitation, mitigation for stormwater management should exceed levels required by the DC Department of Energy & Environment. Best management practices should also be used (e.g., rain gardens, bioswales with native plants, irrigation trenches, permeable pavers in the parking lot and for cart paths, native shade trees in the parking area).
- The new ecological trail may lead to additional social trails, which leads to erosion in sensitive areas throughout the park.
- Extreme rain events associated with climate change could result in erosion and risk collapse and damage of the proposed artificial irrigation pond.
- The site is located in a Municipal Separate Storm Sewer System (MS4)-non-tidal sewer shed. It is draining directly or through a MS4 to a non-tidal tributary. Therefore, the development is required to meet a two-year detention and 50% of the stormwater retention on site.

One commenter was supportive of the proposed bridge near Hole 8 to reduce the adverse erosion impacts associated with foot traffic and trampling near the stream.

IS 0600: ISSUES: VISITOR USE AND EXPERIENCE

Commenters noted what visitors value about their experience and use of the existing golf course and/or Rock Creek Park more generally. Comments included the following:

- The golf course is valuable due to its unique setting and vistas, topography, ecology, and quiet, rustic simplicity.
- The golf course is currently inaccessible to pedestrians and bicyclists because it is only served by an access road that lacks dedicated pedestrian and bicycle facilities and does not have trail connections to the park.
- Some commenters stated the golf course is reserved for a single, exclusive use and takes up a large portion of the park and that visitors engaging in other activities are not

- welcomed; there is a lack of diverse recreation space in the park and this contradicts the park's goal of "enjoyment, education, and inspiration of this and future generations."
- Current conditions at the golf course render some holes unplayable (e.g., grass conditions, slope of the green) or are unattractive to players.

Commenters also provided input about their anticipated visitor use and experience at the golf course and/or Rock Creek Park if the proposed rehabilitation is approved. Comments included the following:

- A driving range at the Rock Creek Park Golf Course would be a welcome addition. It would also help distribute the demand for driving ranges in the area, as others can get very busy and visitors currently must travel longer distances to these other courses to use a driving range, which is inconvenient.
- Visitors appreciate interesting contour on short courses to make play more interesting and fun, as well as the mix of narrow fairways and hilly terrain.
- Being able to golf at night is a unique opportunity and could help make it more accessible on weekdays.
- The course is also an important space for the non-golfing public to recreate and enjoy nature, appreciate the course's history (perhaps via an interpretive element on the proposed trail), gather together as a community, and enjoy other amenities such as the clubhouse; some commenters appreciated the inclusivity of the proposed rehabilitation.
- Proposed new structures should not interfere with visitors' views of the unique golf course setting.
- Visitors appreciate the shorter courses and not having to commit the time necessary to play a full round of golf.
- Visitors are interested in being able to use the driving range and shorter courses to practice and to teach beginners how to play. This setup will also allow players of varying abilities to use the course.
- Commenters also value the variety of amenities that will be available with the proposed rehabilitation and envision it as a place that families can enjoy together.
- Visitors see potential for youth to get involved in golf lessons, summer camps, and after-school activities.
- Having the paths occasionally open to the non-golfing community would allow these visitors to appreciate the bucolic nature of the course; another commenter stated that they would not prefer to walk in the middle of the golf course when there are miles of trail elsewhere throughout the park.
- One commenter disagreed that picnic areas were needed at the golf course when there are picnic/events pavilions throughout the rest of the park; another commenter saw the proposed pavilion as an opportunity for large gatherings such as weddings.
- Some commenters were concerned about the increase of off-leash pets on the new trail, which could disturb others in the park.
- Linking the proposed ecological trail to the Valley Trail would provide direct access to the course from local neighborhoods to the trail network in the park and may help prevent the creation of social trails.
- The golf course exists within a national park and should not become overly commercial with the addition of the proposed new facilities (including the clubhouse and extensive driving range).

ATTACHMENT A: LETTER TO INTERESTED PARTIES

This page intentionally left blank.



United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
Rock Creek Park
3545 Williamsburg Lane NW
Washington, DC 20008
(202) 895-6000



January 3, 2023

Subject: Project Scoping for the Rehabilitation of Rock Creek Park Golf Course

Dear Interested Party:

The National Park Service (NPS) and National Links Trust (NLT) are preparing a Plan/Environmental Assessment to evaluate the rehabilitation of the Rock Creek Park Golf Course.

In 2020, the NPS signed a 50-year lease with NLT, a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. The NPS and NLT are proposing to rehabilitate the Rock Creek Park Golf Course as part of NLT's long-term management of the course.

The purpose of this letter is to inform you of the proposed project described below and to invite you to share your thoughts during a 30-day public comment period, beginning on January 9, 2023, and ending on February 8, 2023. We welcome your input on the proposed project described below.

PURPOSE OF AND NEED FOR THE PROJECT

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;

- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

PROJECT DESCRIPTION

The proposed action is the rehabilitation of the Rock Creek Park Golf Course (see attached project area map) in a manner consistent with the treatment recommendations outlined in the 2019 *Cultural Landscape Report for the Rock Creek Park Golf Course*. The primary components of the proposal are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, includes corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of trees in specific areas to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths
- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use in limited and specific areas of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

In accordance with the National Environmental Policy Act (NEPA), the NPS is preparing an EA to identify alternatives and assess the potential impacts of the Plan. Concurrent to the NEPA process, the NPS will work with the District of Columbia State Historic Preservation Office, the Advisory Council on Historic Preservation, and other consulting parties to develop a formal

determination of effect through the Section 106 of the National Historic Preservation Act of 1966 (as amended) consultation process. The purpose of the Section 106 consultation process is to identify historic properties that could be affected by the Plan/EA, assess adverse effects on those properties, and develop ways to resolve those effects through appropriate avoidance, minimization, and/or mitigation measures.

YOU'RE INVITED

We invite you to attend a virtual public meeting to be held on Thursday, January 26, 2023, from 6:30 PM Eastern Standard Time (EST) to 8:00 PM EST. The purpose of this meeting will be to present the results of initial concepts, and to invite comment on potential impacts to cultural and natural resources. Comments will be accepted from 12:01 AM EST January 9, 2023, through 11:59 PM EST February 8, 2023.

Here is how you can get involved:

Virtual Scoping Meeting: The NPS and NLT will be hosting a public scoping meeting using the Zoom virtual meeting platform on Thursday, January 26, 2023, from 6:30 PM Eastern Standard Time (EST) to 8:00 PM EST. The meeting will last approximately 90 minutes and there will be an opportunity to submit questions. You can access the meeting in several ways. You do not need to pre-register for the meeting.

1. At the time of the meeting, [click here to join](#) on your computer or mobile device. If this link does not work automatically, please go to <https://bit.ly/rock-creek-golf-webinar> on your computer or mobile device, or go to <https://zoom.us/join> and enter Webinar ID: 897 2467 5432, Passcode: 20008. If you do not have Zoom installed on your device, you may be prompted to install a small file to your computer or download the app on your mobile device.
2. You can call into the meeting (no video) using the following phone number:

Phone Number: 1-301-715-8592

Phone Webinar ID: 897 2467 5432

One-click mobile phone connection: +13017158592,,89724675432#

The meeting will be recorded and will be posted online at <https://parkplanning.nps.gov/rockcreekgolfplan> for you to review at your convenience if you are not able to attend the live session.

Submit Comments: Formal comments can be submitted online at <https://parkplanning.nps.gov/rockcreekgolfplan>. Comments must be submitted by 11:59 PM EST February 8, 2023.

If you prefer to mail your comments, make sure they are postmarked by 11:59 PM EST February 8, 2023 to receive consideration. Mail comments to the following address:

Superintendent


Rock Creek Park
RE: Golf Course Rehab
3545 Williamsburg Lane NW
Washington, DC 20008

Comments will not be accepted by fax, e-mail, or any other way than those specified above. Bulk comments in any format (hard copy or electronic) submitted on behalf of others will not be accepted. Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Thank you for your interest in shaping the future of the Rock Creek Park Golf Course.

Sincerely,

**BRIAN
JOYNER**
Brian Joyner
Deputy Superintendent



Digitally signed by
BRIAN JOYNER
Date: 2023.01.03
11:20:47 -05'00'

Project Area Map

National Park Service
US Department of the Interior

National Capital Region Golf Courses Master Lease



Rock Creek Park Golf Course Rehabilitation
Project Area

ATTACHMENT B: VIRTUAL MEETING PRESENTATION

This page intentionally left blank.



ROCK CREEK PARK GOLF COURSE REHABILITATION

WELCOME

to the

Virtual Public Scoping Meeting
Section 106 Consulting Parties Meeting

January 2023



WELCOME!

- Welcome
- Public Meeting Logistics
- Presentation
 - Introduction
 - Site History
 - Existing Conditions
 - Proposed Action
 - Next Steps & How to Comment
- Question and Answer Session



VIRTUAL MEETING TOOLS

- You will be in listen-only mode for the presentation.
- You may type your question or add your comment at any time during the presentation.
- Look for the 'Q&A' and 'Raise Hand' icon in the bottom row of Zoom controls. We will be accepting hand raises for verbal questions at the end of the presentation.
 - Note that we will be accepting questions throughout the webinar and will be addressing them at the end.





QUESTIONS & COMMENTS

Questions or comments submitted during this webinar will not be considered formal comments on the project.

To provide formal comments, please visit:

<https://parkplanning.nps.gov/rockcreekgolfplan>

Follow the link for this project and click
"Open for Comment"



INTRODUCTION

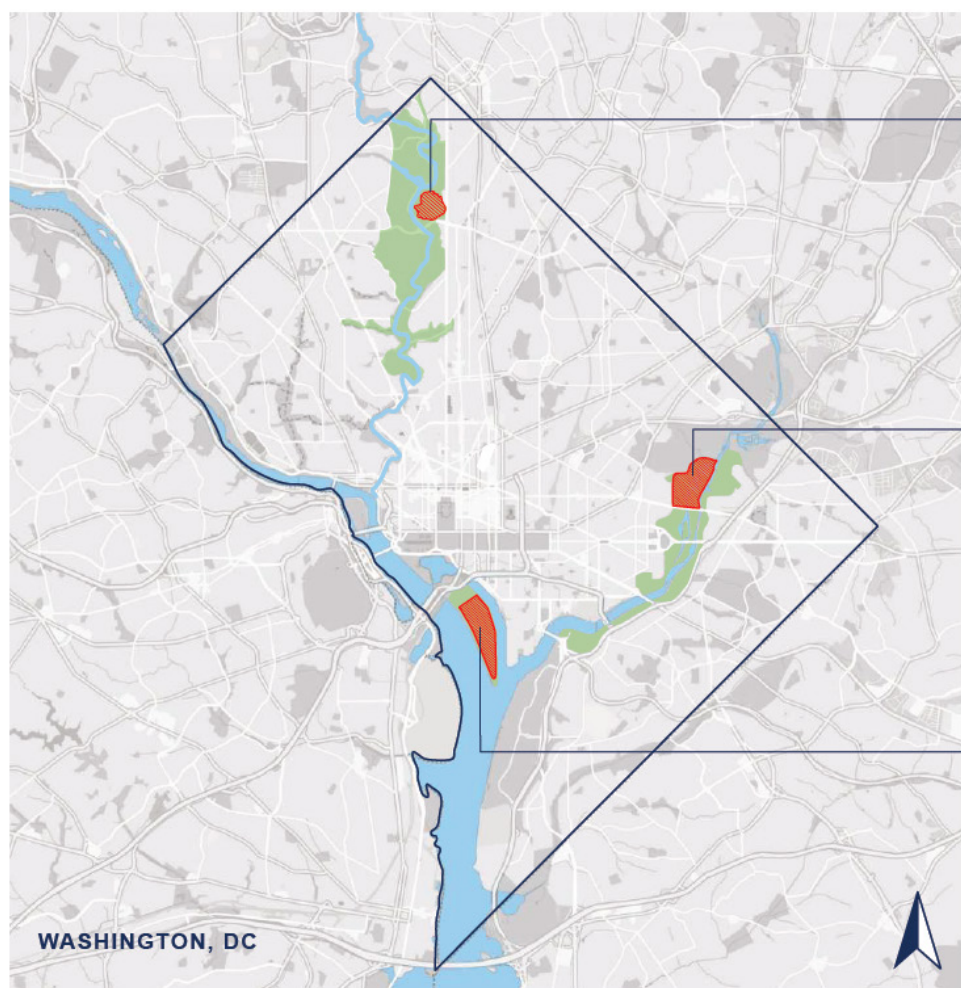


NATIONAL LINKS TRUST + NPS

- National Links Trust (NLT), a 501(c)(3) non-profit, signed a 50-year lease with the National Park Service (NPS) to operate three historic public golf courses in Washington, DC: East Potomac, Langston, and Rock Creek.
- Devoted to the improvement of recreational opportunities while providing broader benefits to the community.
- Committed to implementing a course of action that honors the past and ensures a bright future for Washington DC's three golf course facilities.
- Dedicated to providing affordable, accessible, and engaging golf at well-maintained and environmentally sustainable green spaces that are to the benefit of everyone, golfers and non-golfers alike.



THE DISTRICT'S THREE HISTORIC PUBLIC GOLF COURSES



1 ROCK CREEK PARK GOLF COURSE ROCK CREEK PARK



President Warren G. Harding putting at Rock Creek, 1923.

2 LANGSTON GOLF COURSE ANACOSTIA PARK



Golf Pro Al Green with local youth at Langston, 1979

3 EAST POTOMAC GOLF COURSE EAST POTOMAC PARK



Three women holding golf clubs East Potomac, 1923

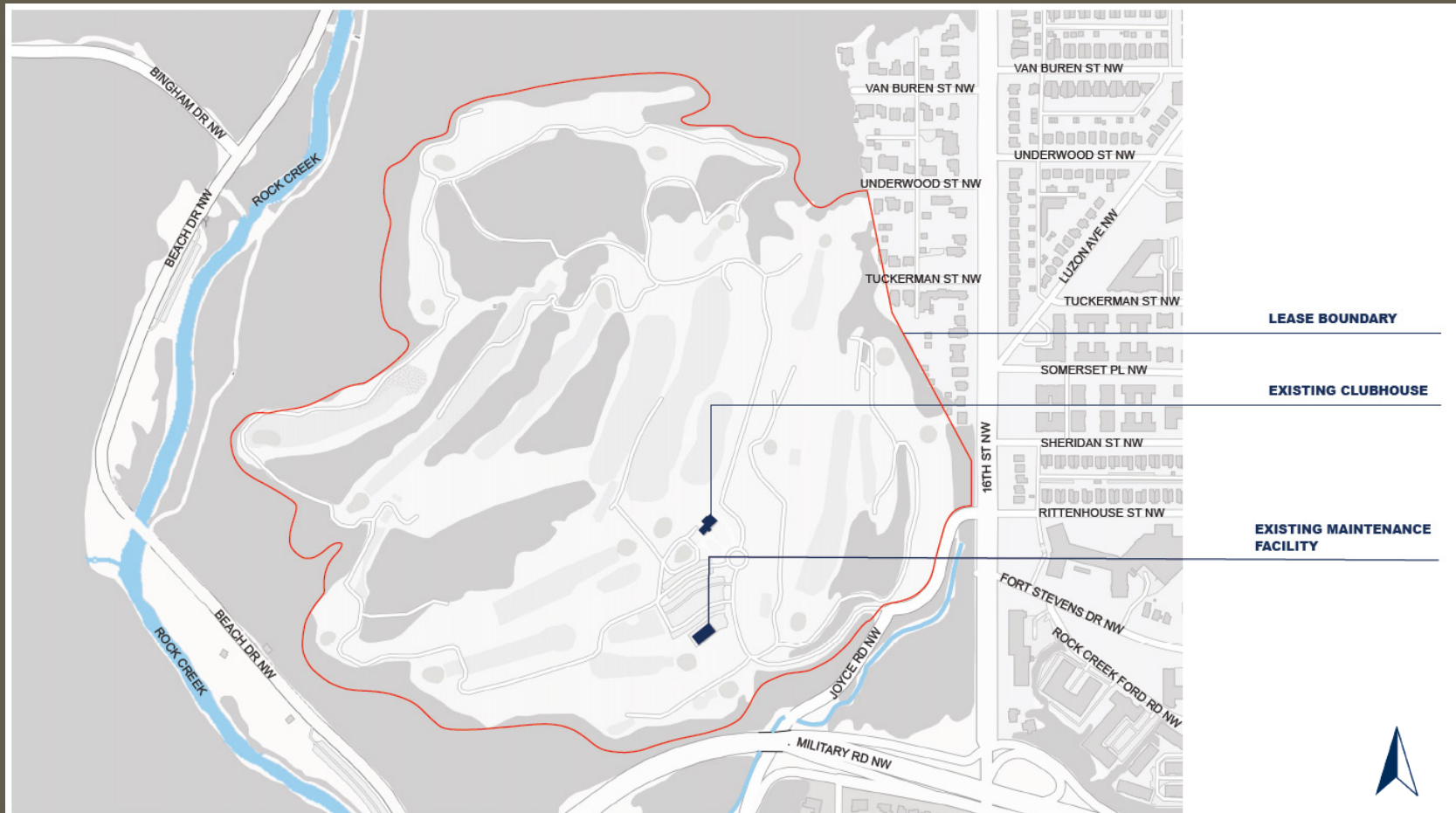


Rock Creek Park Golf Course Rehabilitation

National Park Service
US Department of the Interior



ROCK CREEK PARK GOLF COURSE





PURPOSE OF THE PROJECT

- Address deferred maintenance
- Increase playability
- Broaden course appeal to local community
- Achieve financial stability





NEED FOR THE PROJECT (1/2)

- The historic parkland-style course designed by William Flynn is currently not apparent.
- The current 18-hole course does not lend itself to players of varying skill levels.
- The lack of a driving range impacts the usership and financial viability of the golf course.
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers.



NEED FOR THE PROJECT (2/2)

- The dense overgrowth of the adjacent woodland and invasive vegetation encroaches on and narrows the existing fairways, resulting in decreased playability.
- Turfgrass is deteriorated due to traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees.
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas.
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.



PROJECT GOALS

- Historic Preservation
- Revival of Exemplary Golf Course Architecture
- Environmental Sustainability
- Growth in Golf Participation via Non-Traditional Golf Options
- Expanded Non-Golf Community Infrastructure and Programming



SITE HISTORY AND HISTORIC SIGNIFICANCE



SITE HISTORY

- 8000 BC: Indigenous people began camping along Rock Creek
- 1680s AD: Europeans and Africans (enslaved and free) arrived in this area
- 1740: Families were living on farms within present day Rock Creek Park
- 1864: Battle of Fort Stevens
- 1906-07: DC Commissioners announce plans to establish the city's first public golf course at Rock Creek Park.



Illustration of Stone Working at Piney Branch Quarry (Holmes 1987)



Farmhouse on site that was used as the golf clubhouse from 1923-1964.



SITE HISTORY

- 1923: Completion of William Flynn 9-hole golf course
- 1927: An additional 9 holes added to create an 18-hole golf course and Golf Course Access Road constructed
- 1957-58: Military Road reconstructed into a four-lane freeway
- 1963: NPS receives necessary funds to build new clubhouse constructed in Mission 66 style
- 1970-75: Back nine deterioration requires managers to shorten holes



View from 11th green to the 11th tee showing erosion in front of tee, 1957.



Existing clubhouse under construction, 1964.



SITE HISTORY: FLYNN PLAN

- Flynn is most recognized for his parkland style designs, which are laid out across rolling terrain and typically incorporate mature trees. The steep topography and wooded environs of Rock Creek lent itself to the dramatic parkland-style for which Flynn was known.
- The course's continued use for almost 100 years is a testament to Flynn's desire to build courses that would stand the test of time.





HISTORIC SIGNIFICANCE

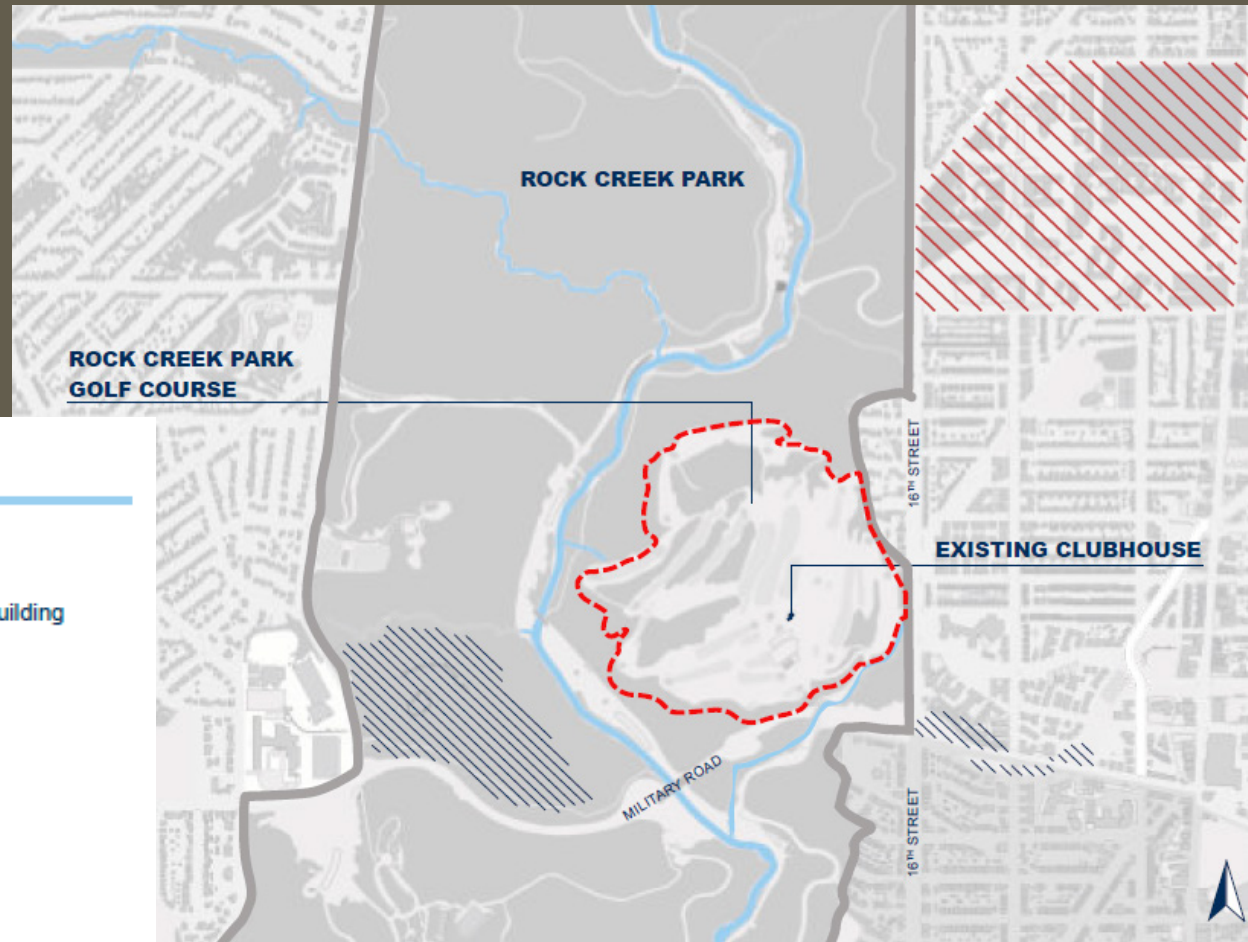
- Listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District
- Criterion A (Events)
 - Urban recreation and development of public golf courses in the District
- Criterion C (Architecture)
 - Designed by golf architect William S. Flynn during the Golden Age of Golf (early 1900s to the Great Depression)
- Periods of Significance
 - 1921-1927 (original design by Flynn)
 - 1963-1964 (construction of the new clubhouse as part of Mission 66)

Rock Creek Park Golf Course Rehabilitation


National Park Service
US Department of the Interior



ROCK CREEK PARK GOLF COURSE AREA OF POTENTIAL EFFECT



KEY

-  Area of Potential Effect (APE)
-  Rock Creek Park Historic District Contributing Building
-  Rock Creek and Other Tributaries
-  Rock Creek Park Historic District Boundary
-  Fort Circle Parks Historic District
-  Former Walter Reed Army Medical Center



EXISTING CONDITIONS

Rock Creek Park

Golf Course Rehabilitation

National Park Service
US Department of the Interior



EXISTING SITE PLAN

- Located on east side of Rock Creek Park at the intersection of 16th and Military Road NW on approximately 100 acres.
- 14-hole course (four holes of the original back 9 are currently not in play) with a counterclockwise progression of play centered on the clubhouse.
- The front 9 holes are characterized by visually open spaces, gentle slopes, and wide fairways.
- The back 5 holes are characterized by narrow fairways, dense forests, and steep slopes.
- The course currently suffers from deferred maintenance that has impacted golf course facilities as well as the playability of the course.



Rock Creek Park Golf Course Rehabilitation

National Park Service
US Department of the Interior



EXISTING SITE PLAN

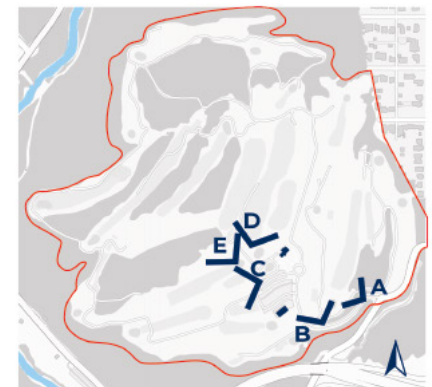
LEGEND

- 2022 Lease Boundary
- Building
- Road
- Pedestrian Path
- On Grade Golf Course Route
- Directional Vehicular Circulation
- Directional Pedestrian Circulation
- Active Holes
- Holes Not in Service Due to Deteriorating Circumstances





EXISTING CONDITIONS





EXISTING CONDITIONS

F



G



H



I



J





TODAY'S CLUBHOUSE

- Is a contributing feature to the Rock Creek Park Historic District
- Built in 1964 in the NPS Mission 66 style
- Does not adequately support golf course operations
- Not accessible to persons with disabilities
- Not a good candidate for reuse due to its small size, lack of accessible facilities and routes, and extensive use of masonry interior partitions that make any floor plan changes costly and difficult





PROPOSED ACTION



GOLF COURSE REHABILITATION PROGRAM

- 9-hole regulation course
- 9-hole par 3 course
- Short game practice area
- 50 bay driving range
- Practice putting green
- Golf academy
- Restaurant & bar with indoor and outdoor seating
- Flexible meeting/event space
- Pro shop
- Accessibility Improvements
- Bike parking
- Community programming space
- Maintenance building and yard
- Park visitor parking
- Hiking trails
- Irrigation pond/pump house
- First Tee DC headquarters





ENTRY SEQUENCE

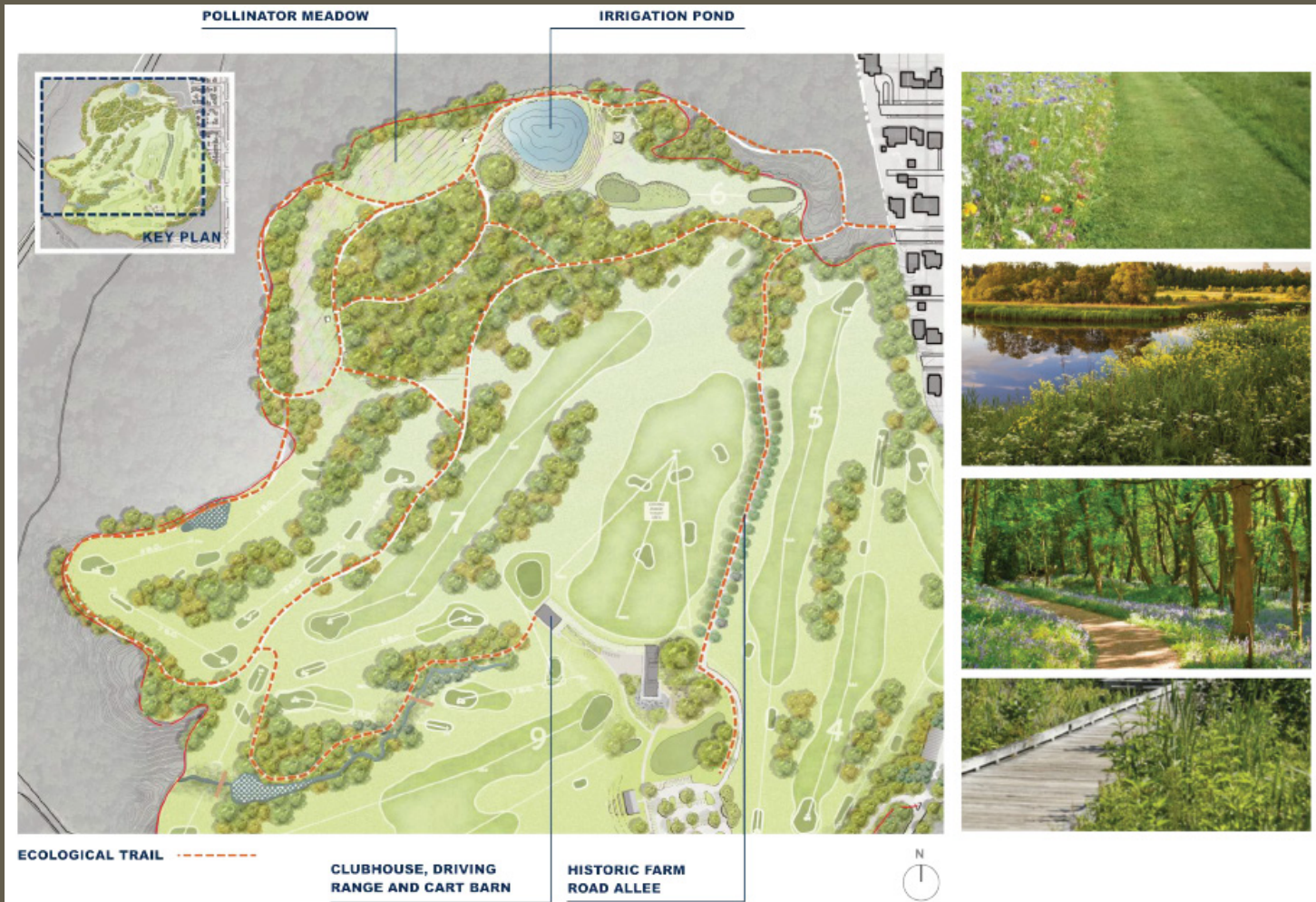


EXISTING VIEWS





ECOLOGICAL TRAIL





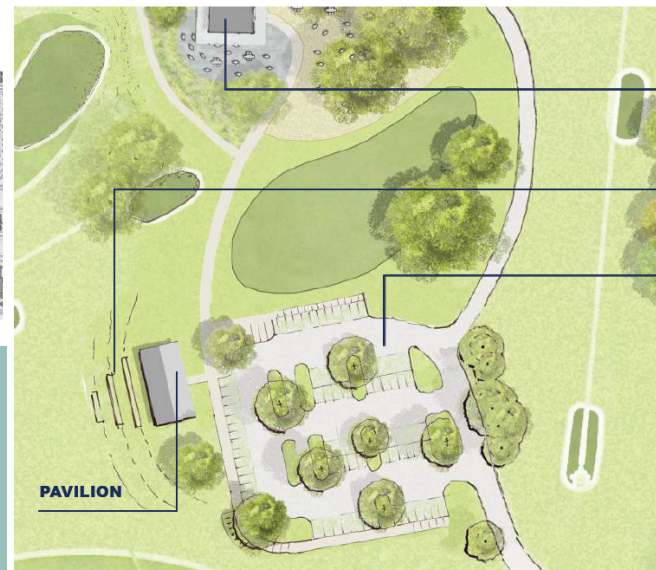
MAINTENANCE BUILDING & PAVILION



- MATERIALS STORAGE
- MAINTENANCE BUILDING
- MAINTENANCE PARKING
- VEGETATION SCREENING



KEY PLAN



- CLUBHOUSE
- TERRACING
- PARKING

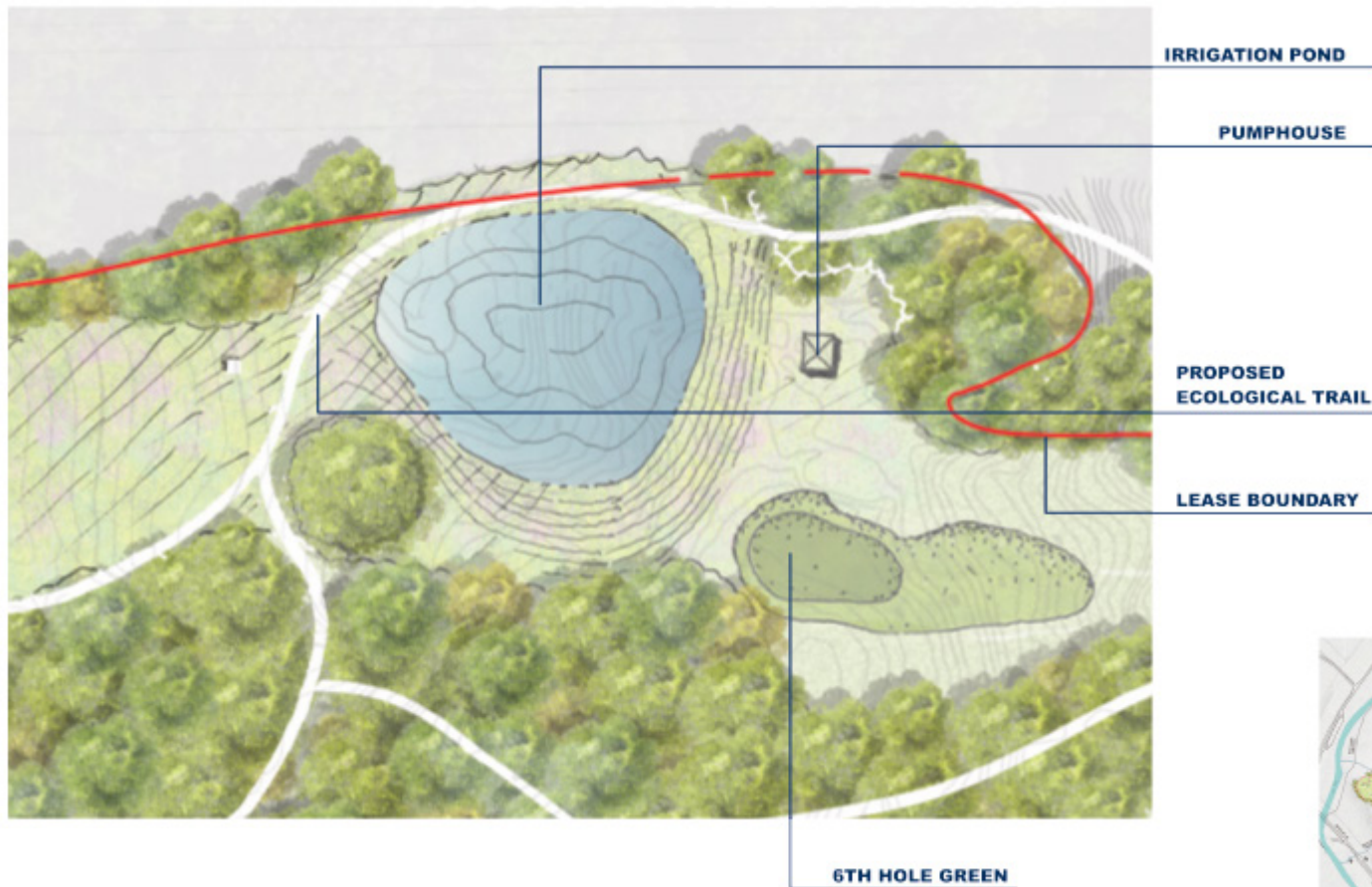
PAVILION



KEY PLAN

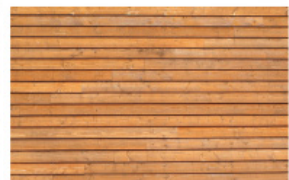
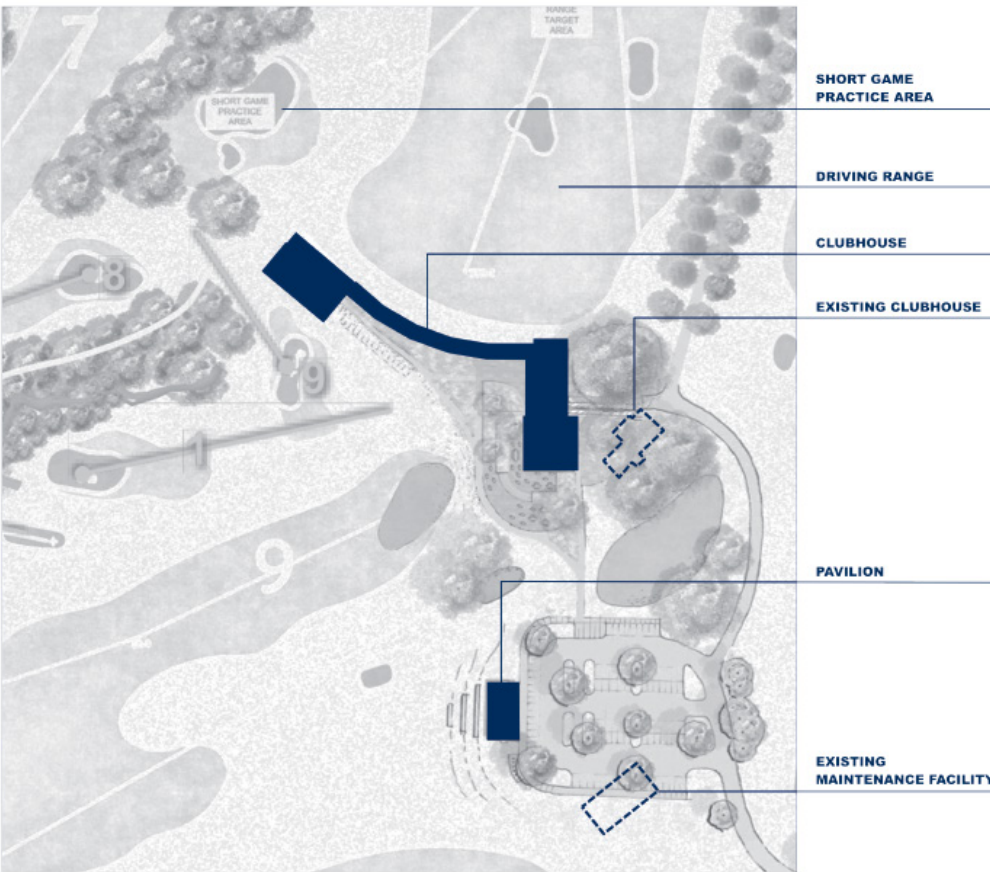


IRRIGATION POND



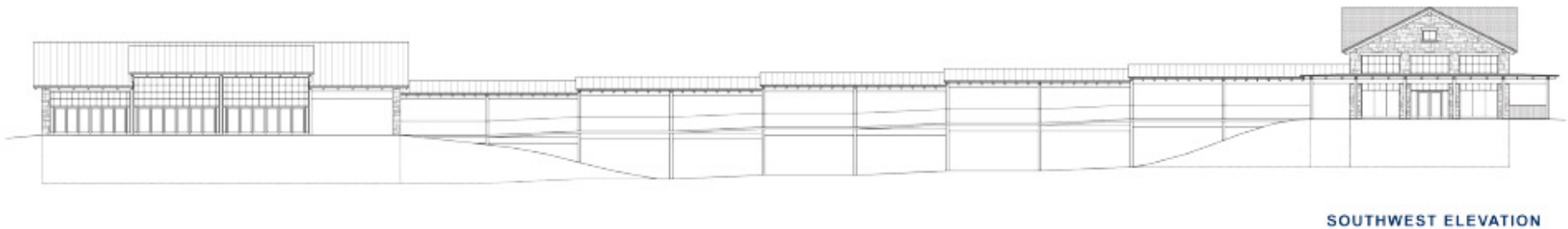


CLUBHOUSE





CLUBHOUSE

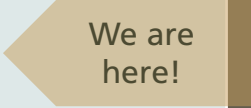




NEXT STEPS



PLANNING PROCESS

Milestone	Targeted Schedule
Public and Agency Scoping	Early 2023 
Environmental Assessment/ Assessment of Effect	Spring 2023
Public Review	Summer 2023
Decision/Agreement Document	Autumn 2023



HOW TO COMMENT

Formal comments can be submitted two ways:

1. Submit comments electronically at:
<https://parkplanning.nps.gov/rockcreekgolfplan>

-- or --

2. Mail or hand-deliver written comments to park headquarters:

Superintendent
RE: Golf Course Rehab
Rock Creek Park
3545 Williamsburg Ln NW
Washington, DC 20008

Please provide
comments by
February 8, 2023



THANK YOU!

We will now answer questions about the project and planning and compliance processes.

Please submit your questions via the [Q&A](#) or [hand-raise](#) buttons.



**APPENDIX B: SECTION 106
CORRESPONDENCE**

This page intentionally left blank.



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Mr. John Johnson
Governor
Absentee Shawnee Tribe of Indians of Oklahoma
2025 South Gordon Cooper Drive
Shawnee, OK 74801

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Governor Johnson:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Absentee Shawnee Tribe of Indians of Oklahoma in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of

the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Absentee Shawnee Tribe of Indians of Oklahoma has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Dr. Wenonah G. Haire
Tribal Historic Preservation Officer
Catawba Indian Nation
THPO Archaeology Department
1536 Tom Steven Road
Rock Hill, SC 29730

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Dr. Haire:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Catawba Indian Nation, in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing

- Removal of invasive species
- Addition of new cart paths
- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B,

and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Catawba Indian Nation has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Mr. William Harris
Chief
Catawba Indian Nation
996 Avenue of the Nations
Rock Hill, SC 29730

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Chief Harris:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Catawba Indian Nation, in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of

the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Catawba Indian Nation has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Mr. Dana Adkins
Tribal Environmental Director
Chickahominy Indian Tribe
8200 Lott Cary Road
Providence Forge, VA 23140

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Mr. Adkins:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Chickahominy Indian Tribe in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of

the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Chickahominy Indian Tribe has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Mr. Gerald Stewart
Chief
Chickahominy Tribe Eastern Division
1191 Indian Hill Lane
Providence Forge, VA 23140

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Chief Stewart:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Chickahominy Tribe Eastern Division in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of

the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Chickahominy Tribe Eastern Division has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Ms. Deborah Dotson
President
Delaware Nation
P.O. Box 825
Anadarko, OK 730005

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Ms. Dotson:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Delaware Nation, in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of

the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Delaware Nation has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Ms. Susan Bachor
East Coast Preservation Representative
Delaware Tribe Historic Preservation, Pennsylvania Office
Delaware Tribe of Indians
P.O. Box 64
Pocono Lake, PA 18347

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Ms. Bachor:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Delaware Tribe of Indians, in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing

- Removal of invasive species
- Addition of new cart paths
- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B,

and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds to the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Delaware Tribe of Indians has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,



Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Mr. Brad KillsCrow
Chief
Delaware Tribe of Indians
5100 Tuxedo Boulevard
Bartlesville, OK 14006

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Chief KillsCrow:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Delaware Tribe of Indians, in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of

the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Delaware Tribe of Indians has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, Foulds H. Eliot, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Mr. Paul Barton
THPO/Director of Culture Preservation Program/NAGRPA
Eastern Shawnee of Oklahoma
70500 East 128 Road
Wyandotte, OK 74370

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Mr. Barton:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Eastern Shawnee of Oklahoma, in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of

the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Eastern Shawnee of Oklahoma has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Ms. Glenna Wallace
Chief
Eastern Shawnee of Oklahoma
70500 East 128 Road
Wyandotte, OK 74370

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Chief Wallace:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Eastern Shawnee of Oklahoma, in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of

the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Eastern Shawnee of Oklahoma has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Mr. Frank Adams
Chief
Upper Mattaponi Indian Tribe
13476 King William Road
King William, VA 23086

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Chief Adams:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Upper Mattaponi Indian Tribe in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of

the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Upper Mattaponi Indian Tribe has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Mr. Reggie Tupponce
Tribal Administrator
Upper Mattaponi Indian Tribe
13476 King William Road
King William, VA 23086

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Mr. Tupponce:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Upper Mattaponi Indian Tribe in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of

the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Upper Mattaponi Indian Tribe has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Mr. Kenneth Branham
Chief
Monacan Indian Nation
P.O. Box 960
Amherst, VA 24521

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Chief Branham:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Monacan Indian Nation in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of

the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Monacan Indian Nation has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Ms. Megan Bass
Nansemond Indian Nation
1001 Pembroke Lane
Suffolk, VA 23434

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Ms. Bass:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Nansemond Indian Nation in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the

site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths
- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course

- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and

expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds to the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Nansemond Indian Nation has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Mr. Marcel Acosta
Executive Director
National Capital Planning Commission
401 9th Street, NW Suite 308
Washington, DC 20004

Subject: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Mr. Acosta:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. We are writing to inform you that the NPS, Rock Creek Park (ROCR), has initiated consultation with the District of Columbia State Historic Preservation Officer (DC SHPO) in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course. The NPS serves as the lead agency for compliance with Section 106 of the NHPA and the National Environmental Policy Act of 1969 (NEPA).

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds to the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with NEPA to evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review. The NPS will

conduct appropriate consultation in accordance with Section 106 and NEPA, providing materials for review as they become available.

Your agency has been identified as one that may have jurisdiction by law and an interest in this project; accordingly, the NPS invites your agency to become a consulting party/cooperating agency for the purposes of Section 106 and NEPA. Please provide a written response indicating NCPC's acceptance or denial of this invitation no later than 30 days from the receipt of this letter to Nick Bartolomeo, Resource Manager for Rock Creek Park, at nick_bartolomeo@nps.gov. If you accept, please identify the appropriate contact person within your organization for future coordination. If your agency declines, the response should state the reason(s) for declining the invitation.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact Mr. Bartolomeo by telephone at 202-895-6010 or at the email address above.

Sincerely,



Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Mr. Robert Gray
Chief/Tribal Administrator
Pamunkey Indian Tribe
1054 Pocahontas Trail
King William, VA 23086

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Chief Gray:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Pamunkey Indian Tribe, in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of

the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Pamunkey Indian Tribe has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Ms. Anne Richardson
Chief
Rappahannock Tribe
5036 Indian Neck Road
Indian Neck, VA 23148

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Chief Richardson:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Rappahannock Tribe in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of

the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Rappahannock Tribe has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

Brian D. Joyner

Julia Washburn
Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Mr. Benjamin Barnes
Chief
Shawnee Tribe
P.O. Box 189
Miami, OK 74354

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Chief Barnes:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Shawnee Tribe in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of

the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Shawnee Tribe has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Ms. Tonya Tipton
THPO
Shawnee Tribe
29 South Highway 69 A
Miami, OK 74354

Re: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park Golf Course

Dear Ms. Tipton:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the Shawnee Tribe in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of

the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS understands that the Shawnee Tribe has an interest in the preservation of American Indian cultural resources in the District of Columbia. Please respond to this invitation with your interest in consulting on this project. Should you decline, we are happy to provide brief updates if you wish. At this time, the NPS invites you to provide any initial comments regarding the proposed project.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



United States Department of the Interior

NATIONAL PARK SERVICE
Region 1 – National Capital Region
Rock Creek Park
3545 Williamsburg Lane, N.W.
Washington, DC 20008-1207

IN REPLY REFER TO:
I.A.2 (ROCR)

July 22, 2022

Mr. David Maloney
State Historic Preservation Officer
Attn: Dr. Ruth Troccoli, Mr. C. Andrew Lewis
DC Historic Preservation Office
Office of Planning
1100 4th Street, SW, Suite E650
Washington, DC 20024

Subject: Initiation of Section 106 Consultation for the Rehabilitation of Rock Creek Park
Golf Course

Dear Mr. Maloney:

In 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT), a 501(c)(3) nonprofit, to operate three historic golf courses in Washington, DC, including the Rock Creek Park Golf Course. NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The NPS, Rock Creek Park (ROCR), is requesting to formally initiate consultation with the District of Columbia Historic Preservation Office, in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations (36 CFR § 800) as amended, regarding NLT's proposal to rehabilitate the Rock Creek Park Golf Course.

The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th Street NW and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front 9. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the construction of the course. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places as a contributing resource to the Rock Creek Park Historic District.

Project Purpose

The purpose of the proposed action is to address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability for the operation of the Rock Creek Park Golf Course. The project will achieve those goals by prioritizing the historic significance and integrity of the original William Flynn-designed golf course, making the site more environmentally sustainable, diversifying the golf programming to appeal to a wider range of golfers, retaining the affordability and accessibility of the golf course facilities, and making the property a more vibrant community resource.

The proposed project is needed to address the following concerns:

- The historic parkland-style course designed by William Flynn is currently not apparent in both the design and the presentation of the course to the public;
- The current 18-hole course does not lend itself to players of varying skill levels due to the truncated nature of the front 9 holes and the challenging topography and narrow fairways of the back 9 holes;
- The lack of a driving range impacts the usership and financial viability of the golf course;
- The limited facilities of the existing clubhouse do not adequately support golf course operations, golfers, and non-golfers;
- The dense overgrowth of the adjacent woodland and invasive vegetation have expanded beyond their original intended limits and have encroached on and narrowed the existing fairways, resulting in decreased playability;
- Traffic patterns, poor cart paths, poor drainage, poor irrigation, tree root competition, and shade from trees have caused the deterioration of turf grass throughout the golf course;
- Trails and paths used by both pedestrians and golf carts are ill-defined and infringe on views and playing areas; and
- The maintenance facility is in a highly visible location and does not meet the needs of golf course operations.

Project Description

The proposed undertaking is the rehabilitation of the Rock Creek Park Golf Course that is consistent with the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The primary components of this undertaking are:

Golf Course Landscape

- Establishment of a 9-hole regulation course that preserves golf course architect William Flynn's parkland-style course, corridors from both Flynn's more open front 9 and more wooded back 9, and incorporates many of Flynn's original greens
- Construction of a 9-hole par-3 course that incorporates many of Flynn's original greens
- Construction of a practice putting green and short game area
- Removal of existing trees to widen the fairways and accommodate the new golf course routing
- Removal of invasive species
- Addition of new cart paths

- Establishment of meadow habitat on abandoned golf course holes
- Establishment of a nature trail in the golf course
- Addition of a retention pond to support golf course irrigation
- Addition of lighting for nighttime use of the golf course and driving range

Golf Course Entrance and Clubhouse

- Demolition of the existing clubhouse and the construction of a new clubhouse in the vicinity of the existing clubhouse
- Construction of a new 50-bay driving range and cart storage building adjacent to the clubhouse
- Modifications to the existing entrance experience, sidewalks, and parking lot
- Construction of a picnic/events pavilion in the vicinity of the clubhouse and parking lot

Maintenance Facilities

- Demolition of the existing maintenance building and the construction of a maintenance building at a new location

Area of Potential Effect

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District, as well as historic resources that contribute to the golf course and/or historic district, to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project. Please find enclosed a map depicting the proposed APE for your review.

Identification of Historic Properties

The National Park Service has completed several relevant cultural resource studies on the Rock Creek Park Golf Course: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); and *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019).

The Rock Creek Park Golf Course is currently listed in the National Register of Historic Places as a contributing resource of the Rock Creek Park Historic District (#91001524), which was entered in the register on October 23, 1991. Rock Creek Park contains over 1400 acres of natural forest growth and accommodates over 300 acres of intensive recreational facilities, roads, trails, structures, and sites. Established in 1890, Rock Creek Park consists of the creek itself and the picturesque scenery surrounding it, which represents the last major parcel of natural landscape in the District of Columbia. The historic district is significant under National Register Criteria A, B, and C in the following areas: architecture; community planning and development; conservation; entertainment and recreation; industry; landscape architecture; military; and horticulture. The period of significance of the historic district is 1791 to 1941.

A 2014 draft amendment to the nomination renamed the historic district the Rock Creek Valley Historic District, acknowledged that the historic district meets National Register Criterion D, and expanded the period of significance. The period of significance of the Rock Creek Valley Historic District amendment extends from 1791 to 1972, with two additional periods of significance for archeological resources from 3000 to 600 B.C.E. and 1740 to 1800 C.E. The 1972 end date corresponds to the construction of resources as part of the Mission 66 program to improve the park's recreational resources. The 2014 amendment to the nomination identified the Rock Creek Park Golf Course's existing 1964 clubhouse as a contributing resource as part of the larger Mission 66 updates made throughout the park.

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A, in the area of recreation, and under Criterion C, in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in history of golf in the United States and the development of municipal recreation in Washington, D.C. Additionally, it is an important local work of golf course architect William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

NLT, in cooperation with the National Park Service, recently completed a Phase IA archeological study on the Rock Creek Park Golf Course. The study included a review of previous archeological and cultural landscape studies and historical maps, development of precontact and historic contexts, a geographic information system (GIS) cut-and-fill analysis to estimate past landscape change, and field investigations by a geomorphologist to evaluate landscape integrity. Both the GIS cut-and-fill analysis and the field investigation showed that the landscape of the golf course retains significant integrity. Only limited grading was done when the course was constructed. Research shows that at least two nineteenth-century farms existed within the golf course property, and comparison with similar properties at Rock Creek Park suggests that there is also potential for the property to contain the sites of colonial tenancies and precontact camps. There is also a chance that Civil War munitions from the Battle of Fort Stevens (1864) might be present across the northern half of the area studied. The Phase IA study concludes that portions of the Rock Creek Park Golf Course retain sufficient integrity for archeological sites to be present, and that the potential for such sites exists. The study recommends a Phase IB (shovel testing) survey of the areas where restoration will impact subsurface soils. Those areas include 10.5 acres of proposed tree clearing, the location of the new pavilion, and other areas totaling about 1.5 to 2.5 acres. Enclosed are the Phase 1A Archeological Study and the Phase IB Workplan for your review.

Consultation and Next Steps

In accordance with Section 106 of the NHPA, the NPS will consider the effects of this undertaking to historic properties. Concurrent to Section 106 consultation, the NPS will review this project in accordance with the National Environmental Policy Act of 1969 (NEPA) to

evaluate potential environmental impacts that would result from the proposed action and will undertake the appropriate NEPA review.

The NPS will conduct appropriate consultation in accordance with Section 106, providing materials for review as they become available. At this time, the NPS invites you to provide any initial comments regarding the proposed project. Additionally, we appreciate your review of the Phase IA Archeological Study and Phase IB Workplan.

We look forward to your response. Should you have any questions or comments regarding this correspondence, please contact Nick Bartolomeo, Resource Manager, by telephone at 202-895-6010 or by email at nick_bartolomeo@nps.gov.

Thank you for your continued assistance.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Joyner".

Brian Joyner
Acting Superintendent

Enclosure: APE Map, List of Consulting Parties, Phase IA Archeological Study and Phase IB Workplan

Sources

Babin, Patricia K. *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia. Historic Resource Study*. National Park Service-National Capital Regional Office. National Capital Region, Washington, D.C., 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2254682>

Garrison, Shannon. *Rock Creek Golf Course: Cultural Landscape Inventory, Rock Creek Park, National Park Service*. NPS National Capital Regional Office. National Capital Regional Office/ CLI Database, 2017. <https://irma.nps.gov/DataStore/Reference/Profile/2240481>

Joseph Maureen D., Michael Commisso, H. Eliot Foulds, Michael W. Stachowicz, Daniel T. Weldon. *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek: Treatment Guidelines Cultural Landscape Report. Cultural Landscape Report*. U.S. Department of the Interior. Washington, D.C., 2019. <https://irma.nps.gov/DataStore/Reference/Profile/2264719>



As the nation’s principal conservation agency, the Department of the Interior has responsibilities for most of our nationally owned public lands and natural resources. This includes fostering wise use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historic 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. The department also promotes the goals of the Take Pride in America campaign by encouraging stewardship and citizen responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.