

## **Appendix C**

### **Organizations Comment Letters**

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MR. HAIRSTON: Ladies and gentlemen, I'm Joseph Hairston. I live in D.C. I'm here representing the 92<sup>nd</sup> Infantry Division World War II Association. We're an association of young men. Nobody is under 80. Just so there is no doubt about my position, let me start by saying a pox on everything that you proposed.

The founding document of this nation starts out with "We The People," not we the bureaucrats or we the government, but "We The People." Now we the people don't want it. You want to impose it on us and tell us it's good for us notwithstanding what we tell you.

I have lived almost 50 years within three blocks of the park. I have used the park when I was able to walk. My children have played in the park. It didn't bother us about the cars because the kids waded in the creek. We explored the hillsides. We used the park. We shared it with people who were driving. There's nothing wrong with that.

Now that I'm old, now that my members are old, we can't do that. Yet we like to drive through the park. It is a wonderful thing to drive through the park in the changing seasons, to see the buds come out in the summer and to see the leaves turn in the fall. We love the park.

Now, I don't trust the bureaucrats. You say you have traffic studies that say we do all of these good things and there won't be much impact. I have lived in Shepherd Park for almost 40 years. That is a major traffic artery. We know what traffic is like. If you move any traffic out of the park, notwithstanding the guy from Silver Spring who doesn't live there, it has to go someplace.

We have enough traffic on our streets already. Do you want people to breathe the fumes, or do you want trees to breathe the fumes? Trees can use the fumes. They use carbon dioxide. People can't use carbon dioxide. Think about it for a minute. Is the park for people or for a bureaucrat?

I don't trust the Park Service and what they say. When they closed the Beach Drive years ago, Sherrill Drive was supposed to remain open so that those of us who live in Shepherd Park and the northern part of Brentwood (PH) could go east and west across the park. You can't do that, and there was no public hearing changing it.

When it first happened, we could do it. Now you can't do that.

Why should we have to lose a part of the facility? As our Council Member stated, the enabling legislation said it was for all the people, not for some of the people some of the time. It was for all of the people all of the time. We expect our Park Service to facilitate our use of the park, not to inhibit our use of the park.

One of the things I've heard is you'll be able to get into Groves Ten (PH) or whatever that is at the upper end of the park. But do you want a bureaucrat telling you that you have to go this way and you have to go that way to get where you want to go? Shouldn't we the people be able to decide which way we want to go? We're not hurting anybody.

If I approach from Sherrill Drive or from Bingham Drive or from Kalmia Road or from Military Road, why shouldn't I be able to approach a road the way I want to rather than have some bureaucrat tell me I have to go this way because I like it that way? The bureaucrats said that's good for me. I don't want somebody telling me what's good for me.

We're not asking you for anything special for us. The fact that we're old men, we're not entitled to anything special, but we're entitled to the rights that we fought for that we inherited. We don't want you or anybody else to tell us what we should do and when we should do it. Leave us alone. Let us use our park. As I said, a pox on everything you proposed. Open the park to all of us at all times. Build a bike trail that separates cyclists from the drivers.

The way you fund it. One of those proposals has you moving the park people out of the park into new buildings. Save that money. Keep them in the park. I want you to stay in the park and watch the park and preserve it for us. Instead of doing that, use the money and find a way to have a complete trail for the cyclists all the way through the park. Do something for us.

#### **NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE. N.W.

WASHINGTON, D.C. 20005-3701

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MR. ANDERSON: Good evening. I'm Lon Anderson, Director of Public and Government Relations for AAA Mid-Atlantic, 701 15<sup>th</sup> Street, N.S., 20005. And thank you for the opportunity to address you.

Alternative B continuing the current management plan with drastic auto eliminating—that is without drastic auto eliminating policy is our strong preference. The vast majority of visitors to the park from your own numbers are in fact commuters who utilize Beach Drive and other park roads through the park as part of their trips. Your figures indicate that you have about 2 million recreational visitors a year, about 12.4 million motorist visitors to the park on trips in which they are utilizing the park's roads on their way elsewhere.

Some would imply that those who make the park part of their drive on the way to other places are inferior visitors who have less right to enjoy the park than others. We disagree and object to the alternatives that would limit, restrict or end their access completely. Alternatives A, C and D would all limit traffic in one form or another. The message is clear. Visitors in cars are indeed inferior or a nuisance who must be limited. We strongly disagree.

This is an urban park, not a wilderness area. Much of the park already allows for safe joint use for pedestrians, bikers and vehicular traffic. More effort needs to be made to create safe paths and safe opportunities for all users.

On weekends much of the park is already restricted to nonauto use, and we feel that's appropriate and commendable and it's heavily used as a recreation facility at that time. Such would not be the case if it were just open to recreation during the week. But on business days the park is more than ideally placed for people's recreation for them to walk and bike and skate. It's an integral park with a transportation system for our nation's capital. And that transportation system, unfortunately, is currently rated fourth most congested in the nation. It has an enormous capacity issue.

And although the capacity issue is worse at rush hours, we have capacity issues on many of these roads in and out of the District much of the workday everyday. Additionally, while alternative D seems to define rush hour as ending at 9:30 a.m. beginning at 3:30 p.m. already we are seeing such definitions of road on our major arteries. And according to experts, our rush hours will continue to expand until they're almost not separated. This will take, admittedly, will take a toll on all but makes the availability of the park as a transportation resource of equal importance.

Ironically, shutting down Beach Drive daily during non rush hour will by definition then make that part of the park road solely a rush hour commuter route while severely limiting access of other park users who would drive to their park destinations to enjoy the park.

Comments submitted in 1998 on similar proposals indicated, according to your own summaries, that the largest group of commentators were satisfied with the current traffic patterns. We'd suggest this is still true. We would urge you to consider the damaging impact on surrounding neighborhoods and arteries that shutting it down to traffic would create, and certainly we've heard more about that tonight.

Lastly, we agree with your apparent underlying assumption that business as usual probably is not good business for the Park Service. We do not advocate the status quo. We would urge more enforcement and we would urge better control of the roads in the park borders. We think that enforcement and engineering can help make the park safer for all who use it, vehicular traffic, bicyclists, pedestrians. We understand that this is a resource issue and we'd be happy to work with you to help you find more resources for the enforcement that's needed.

And lastly, we don't think this ought to be your definitive statement for the next 20 years. We are in flux in the Washington Metropolitan area, traffic is getting worse. We think that you ought to come back and look in five years at a minimum and say is this the right way to go. And we think that the study is not focused on other alternatives that can be employed to tame traffic if necessary in the future.

The park is a treasure that we should all be able to enjoy and that you seek to include as many as possible, not as few as possible.

**NEAL R. GROSS**  
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**ADVISORY NEIGHBORHOOD COMMISSIONERS' ASSEMBLY**  
**140 BATES STREET, N.W.**  
**WASHINGTON, D.C. 20001**

May 15, 2003

Adrienne Coleman, Superintendent  
 Rock Creek Park  
 3545 Williamsburg Lane, N.W.  
 Washington, D.C. 20008-1207

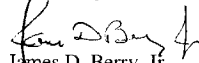
Dear Superintendent Coleman:

Attached please find a Resolution that was adopted by the Advisory Neighborhood Commissioners' Assembly (ANC Assembly) on Saturday, April 26, 2003, that "opposes any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic."

For your information, the ANC Assembly consists of a group of Advisory Neighborhood Commissioners from every ward in the District of Columbia, who come together monthly to work on ways in which to improve the Advisory Neighborhood Commissioner system, as well as to develop and to support initiatives that enhance the quality of life for those who reside in Washington, D.C.

We thank you in advance for giving prompt and serious attention to our position on this matter.

Yours truly,

  
 James D. Berry, Jr.  
 Chairperson

JDB

**ADVISORY NEIGHBORHOOD COMMISSION'S ASSEMBLY**  
 April 26, 2003

**RESOLUTION**

*Opposing the alternatives in the Rock Creek Park General Management Plans that propose to close three sections of Beach Drive to automobiles.*

**WHEREAS**, The National Park Service, Department of Interior, announced in the Federal Register on March 14, 2003, the availability of a draft Environmental Impact Statement and General Management Plan for Rock Creek Park, Washington, DC.

**WHEREAS**, The Environmental Impact Statement and General Management Plan evaluates the following four alternatives for Rock Creek Park: (1) **Alternative A** would generally retain the current scope of visitor uses with improvements in visitor safety, better control of traffic volumes and speeds through the Park; (2) **Alternative B** would propose no actions at all; (3) **Alternative C** proposes to close three sections of Beach Drive to automobiles **at all times** and, thereby, eliminate traffic in much of the northern part of the Park; (4) **Alternative D** proposes to close three segments of Beach Drive in the northern portion of the Park to motorized vehicles **for a 6-hour period, from 9:30 a.m., to 3:30 p.m., on weekdays.**

**WHEREAS**, Alternative D, which only completely opens Beach Drive at rush hour times, would facilitate commuter access through the Park but would have an adverse effect on local motorists and residents east and west of Rock Creek Park who will no longer be able to traverse the Park through local streets. They would be forced to go miles out of their way, even into Maryland in order to reach either side of the park.

**WHEREAS**, Alternatives C and D prohibit access to Beach Drive from most roads and increase traffic on streets that are already heavily trafficked such as 16<sup>th</sup> Street NW, 14<sup>th</sup> Street NW, Military Road, Piney Branch Parkway and 13<sup>th</sup> Street, Park Road, and Blagden Avenue.

**WHEREAS**, The proposal, by prohibiting automobile access to the park, benefits the young and mobile but penalizes many Seniors, the handicapped, small children and others with mobility challenges from using the park.

**WHEREAS**, The proposal, by prohibiting automobile access to the park, blocks access to emergency evacuation routes at Rock Creek Parkway and George Washington Parkway. **THEREFORE**, it is

**Resolved**, That the Advisory Neighborhood Commission's Assembly opposes any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic.

Approved at a duly noticed meeting on April 26, 2003, with a quorum present.


 Chairman  
 Advisory Neighborhood Commission's Assembly

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		<b>ADVISORY NEIGHBORHOOD COMMISSION 3C</b> <b>GOVERNMENT OF THE DISTRICT OF COLUMBIA</b> CATHEDRAL HEIGHTS • CLEVELAND PARK • MASSACHUSETTS AVE. HEIGHTS MCLEAN GARDENS • WOODLEY PARK
Single Member District Commissioners 01-Allen Hahn; 02-Kurt Vordran; 03-Sally MacDonald 04-Richard C. Bartel; 05-John Welsh; 06-Trudy Reeves 07-Sheila Hogan; 08-Nancy Nord; 09-Nancy MacWood	2737 DEVONSHIRE PLACE, NW WASHINGTON, DC 20008 TEL 202/232-2232 • FAX 202/232-2232 Email <a href="mailto:anc3c@starpower.net">anc3c@starpower.net</a> Listserv <a href="http://groups.yahoo.com/group/anc3c">http://groups.yahoo.com/group/anc3c</a> Website <a href="http://www.anc3c.org">http://www.anc3c.org</a>	

National Park Service  
 Superintendent  
 3545 Williamsburg Lane, NW  
 Washington, DC 2008-1207

June 25, 2003

To Whom It May Concern::

On Monday, June 23<sup>rd</sup>, Advisory Neighborhood Commission 3C unanimously passed a resolution regarding the alternatives for Rock Creek Parkway circulation.


The resolution is enclosed. ANC3C commissioners appreciate your consideration of their view on this matter. If you have any questions or require further action on our part, please contact ANC3C Commissioner Trudy Reeves at (202) 364-8897.

Sincerely,



Nancy J. MacWood  
 ANC Chair



		<b>ADVISORY NEIGHBORHOOD COMMISSION 3C</b> <b>GOVERNMENT OF THE DISTRICT OF COLUMBIA</b> CATHEDRAL HEIGHTS • CLEVELAND PARK • MASSACHUSETTS AVE. HEIGHTS MCLEAN GARDENS • WOODLEY PARK
Single Member District Commissioners 01-Allen Hahn; 02-Kurt Vordran; 03-Sally MacDonald 04-Richard C. Bartel; 05-John Welsh; 06-Trudy Reeves 07-Sheila Hogan; 08-Nancy Nord; 09-Nancy MacWood	2737 DEVONSHIRE PLACE, NW WASHINGTON, DC 20008 TEL 202/232-2232 • FAX 202/232-2232 Email <a href="mailto:anc3c@starpower.net">anc3c@starpower.net</a> Listserv <a href="http://groups.yahoo.com/group/anc3c">http://groups.yahoo.com/group/anc3c</a> Website <a href="http://www.anc3c.org">http://www.anc3c.org</a>	

#### ANC 3C RESOLUTION 2003-018

##### Resolution Regarding Rock Creek Parkway Circulation

WHEREAS the National Park Service of the U.S. Department of Interior (NPS) has invited public comment on the Draft General Management Plan, Environmental Impact Statement for Rock Creek Park and the Rock Creek and Potomac Parkway, which provides four alternatives for consideration:

Alternative A: Improved management of established park uses including better control traffic volumes and speeds through the park by implementing high-occupancy-vehicle restrictions on Beach Drive during rush-hour periods in the primary travel direction of the traffic.

Alternative B: No action alternative - Continue current management practices

Alternative C: Permanently close selected segments of Beach Drive north of Broad Branch Road to motorized vehicles and promote nonmotorized recreation

Alternative D: Close three segments of Beach Drive in the northern portion of the Park to motorized vehicles for a 6-hour period from 9:30 AM to 3:30 PM on weekdays, enhancing recreational and education use of Park resources; and

WHEREAS ANC 3C includes the portion of Rock Creek Park west of Rock Creek, South of Rodman Street and north of the intersection of Rock Creek Parkway and Connecticut Avenue; and

WHEREAS the analysis of the environmental consequences found that all alternatives would have fairly similar effects on air quality, water quality and hydrology of Rock Creek and its tributaries, wetlands and floodplains, deciduous forests, and protected and rare species; and

WHEREAS the weekend traffic restrictions on Beach Drive have led to intensive recreational use by hikers, bikers, roller-bladers, and the wheelchair-bound; and

WHEREAS there is now no continuous bicycle path or trail traversing the length of Rock Creek Park and this lack is a major obstacle to bicycle commuting, which it is in the public interest to encourage, and

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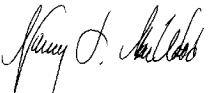
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WHEREAS DC Department of Transportation has indicated that once the 16th Street reconstruction project has been completed, they would support a carefully controlled demonstration project on Beach Drive to monitor pre- and post-demonstration lane closures and measure predetermined evaluation criteria.

THEREFORE BE IT RESOLVED that ANC 3C supports the adoption of Alternative B and requests that the following provisions be incorporated into the General Management Plan, Environmental Impact Statement for Rock Creek Park and the Rock Creek and Potomac Parkway:

- (1) that no part of Beach Drive and Rock Creek and Potomac Parkway be subjected to high-occupancy-vehicle restrictions;
- (2) that NPS adopt as an objective broadening the existing bike path from Virginia Avenue to Beach Drive and the completion of a continuous bicycle path and hiking trail traversing the length of Rock Creek Park from Beach Drive to East-West Highway, exploring routes other than one adjacent to Beach Drive if necessary;
- (3) that NPS provide a minibus shuttle service between subway stations east and west of Rock Creek Park, the Rock Creek Nature Center, and the proposed Rock Creek Park Visitor Center during weekends to promote the use of Rock Creek Park by Metro riders;
- (4) that the proposed Rock Creek Park Visitor Center also include a police substation.

This resolution was approved by the ANC 3C by a unanimous vote of 8-0 at its regular public meeting on June 23, 2003, at which a quorum was present.

Attested by  , Chair, on June 23, 2003  
Nancy MacWood

MR. BARDIN: Good evening. I'm David Bardin, B-A-R-D-I-N. I live in D.C. I'm speaking of Advisory Neighborhood Commission 3F. I'm the Secretary of ANC-3F and we are all meeting tonight in ANC-3F. Welcome to our neighborhood. Very pleased to have you here, Superintendent Coleman. Always nice to see you again. And Chief Planner Gregerson. All right.

ANC-3F includes the portion of Rock Creek Park west of the creek, south of Military Road and north of Tilden Street. It includes most of Melvin Hayson Park and all of Soap Stone Valley Park, and it includes such landmarks in the park as Pierce Mill.

ANC-3F adopted a resolution which has been submitted for the record to the headquarters on Tuesday, and it includes a reference to the 1890 legislation which established the park that stated that it is to be perpetually dedicated and set apart for the benefit and enjoyment of the people of the United States and further directs the park managers to provide for public recreation and specifically to "lay out and prepare roadways and bridle paths to be used for driving and for horseback riding respectively, and footways for pedestrians."

We've reviewed the alternatives presented in the draft management plan and it resolves three things. First, ANC-3F recommends that the National Park Service adopt alternative B. Alternative B, that means continue current management with no action and—and, second we recommend that the National Park Service adopt out of alternatives A,C and D the following proposals and add them to alternative B, namely: (a) upgrade park trails; (b) increase use of park historic resources for interpretative and educational purposes, and; (3) improve park introduction information services and finally; (d) relocate the park administrative facilities and park police substation outside—outside the park.

And finally, third, ANC-3F recommends that the National Park Service revisit the policy of closing certain portions of Beach Drive to motorized traffic on weekends and that these sections be open for the benefit and enjoyment of all citizens at all times.

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If time permits, I'd like to add to this position of the ANC some personal supplemental views concerning what I'll call looting and degradation of the park. The full restoration of Pierce Mill by the National Park Service and a private public partnership, access to the park via Soap Stone Valley Park, which is not really practical today, as well as analysis of some of the Beach Drive issues. Now, excess focus on proposed additional restrictions against traditional motorized uses of Beach Drive could carjack any general management plan. It could distract public attention from more valuable, albeit more difficult and more costly, measures that are needed or could be needed and really deserve intense consideration. The GNP or any final GNP should fully explore the question of adjacent landowners and what they do either by outright encroachment of their facilities into the park or pollution of the park. That needs to be a major focus of attention in the GNP, including what resources the Park Service has to deal with it, how you work with the city government, the building permit people, whether that could be improved. That's a whole area I'd like to see you add. Second, Pierce Mill. It's a question of rehabilitation. That's addressed in the GNP, but I really mean restoration. Get those millstones working and maintenance and operation. That could be costly. There's a partnership, as you know, with Friends of Pierce Mill. Our ANC has actually made a grant to Friends of Pierce Mill as part of the seed money to get it started. But we'd like to see the full restoration identified in the work that you do. Third, Soap Stone Valley Park, which extends from just east of Connecticut Avenue—  
MR. BARDIN: Right. I'd like to see you look at access either by acquiring land, acquiring easement, foot bridge, somewhere so people could get from Connecticut Avenue and the apartment houses, the Metro rail, the Metro bus into Rock Creek Park.

And finally, you're now restricting access to portions of Beach drive, 30 percent of the—  
Your proposal is to increase the restrictions to 63 percent, and that's really an awful lot when you won't let people even comment on reducing the restrictions and bringing them back.

Thank you very much.

**NEAL R. GROSS**  
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Government of the District of Columbia  
**Advisory Neighborhood Commission 3F**  
 North Cleveland Park ■ Forest Hills ■ Tenleytown

3F01 Carl R. Kessler  
 3F02 Karen Lee Perry  
 3F03 Robert V. Maudlin  
 3F04 David J. Bardin  
 3F05 Judith M. Bernardi  
 3F06 Cathy Wiss  
 3F07 Stephen N. Dennis

Treasurer  
 Vice Chair  
 Secretary  
 Chair



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 fax: 202.686.7237

September 16, 2003

Ms. Adrienne A. Coleman  
 Superintendent  
 Rock Creek Park  
 3545 Williamsburg Lane, N.W.  
 Washington, D.C. 20008

Dear Ms. Coleman:

Enclosed is ANC3F Resolution 03-19 which was adopted on  
 September 15, 2003.

The resolution recommends that there be no trial  
 demonstration for the closure of Beach Drive between 9:30 am and  
 3:30 pm weekdays.

Very sincerely yours,

*David J. Bardin*  
 David J. Bardin, Secretary

enc. Res03-19

FILE CO.

Res 03-19

**ANC 3F RESOLUTION REGARDING PROPOSAL FOR TEST CLOSURE  
 OF BEACH DRIVE TO MOTORIZED VEHICLES**

Advisory Neighborhood Commission 3F  
 North Cleveland Park, Forest Hills & Tenleytown  
 4401-A Connecticut Avenue, N.W., #244  
 Washington, D.C. 20008-2322

**WHEREAS:** ANC 3F includes the portion of Rock Creek Park west of Rock Creek, South of  
 Military Road, N.W. and north of Tilden Street, N.W. including Melvin Hazen Park and  
 Soapstone Valley Park ; and

**WHEREAS:** Beach Drive traverses this portion of Rock Creek Park; and

**WHEREAS:** in March 2003 the National Park Service (NPS) released a Draft General  
 Management Plan, Environmental Impact Statement for Rock Creek Park and the Rock Creek  
 and Potomac Parkway providing four alternatives for consideration:

- Alternative A: Improved management of established park uses.
- Alternative B: Continue current management/No action.
- Alternative C: Nonmotorized recreation emphasis.
- Alternative D: Mid-weekday recreation enhancement; and

**WHEREAS:** the major difference between the four alternatives is the traffic management  
 measures for Beach Drive, with alternatives A, C and D providing for restricting or prohibiting  
 motorized vehicles on certain sections of Beach Drive including the section in ANC3F; and

**WHEREAS:** Alternatives A, C and D also provide for:

- Upgrading recreation trails.
- Increasing use of park historic resources for interpretive and educational purposes.
- Improving park introduction and information services.
- Relocating park administrative facilities and U.S. Park Police substation outside the  
 park;

**WHEREAS:** alternatives A, C and D would divert traffic that would use Beach Drive under  
 alternative B to nearby residential and other street including streets in ANC3F; and

**WHEREAS:** on May 19, 2003 ANC3F approved Resolution 03-08 recommending that the NPS:

A. adopt Alternative B: Continue current management/No action; and

B. adopt the proposals in Alternatives A, C and D to (a) upgrade park trails, (b) increase  
 use of park historic resources for interpretive and educational purposes, (c) improve park

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introduction and information services, and (d) relocate park administrative facilities and U.S. Park Police substation outside the park; and

**WHEREAS:** the District Department of Transportation (DDOT) is now supporting a trial demonstration for the closure of Beach Drive between 9:30 am and 3:30 pm weekdays; and

**WHEREAS:** DDOT states that a trial demonstration would require review and approval by the affected Advisory Neighborhood Commissions; and

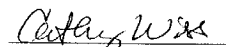
**WHEREAS:** the current mix of recreational and nonrecreational use of the park and parkway, including urban traffic, is appropriate and enhances the quality of life in the city and surrounding region; and


**WHEREAS:** adoption of Alternative B will permit the NPS to continue to implement service wide legal mandates and policies including natural resource management, cultural resource management, special use management and visitor experience and park use requirements;

**THEREFORE BE IT RESOLVED THAT:** ANC 3F recommends that there be no trial demonstration or other closure of Beach Drive to motorized vehicles; and

**BE IT FURTHER RESOLVED THAT:** ANC 3F recommends and urges DDOT to withdraw its proposal for a trial demonstration for the closure of Beach Drive.

Approved by a vote of 5-0-0 at a duly noticed public meeting on September 15, 2003, with a quorum present.

  
Cathy Wiss, Chair

  
David J. Bardin, Secretary

**ANC 3F (North Cleveland Park, Forest Hills & Tenleytown) COMMENTS REGARDING DRAFT GENERAL MANAGEMENT PLAN, ENVIRONMENTAL IMPACT STATEMENT ROCK CREEK PARK AND THE ROCK CREEK AND THE POTOMAC PARKWAY**  
Hearing - U.D.C. Auditorium - Building 46 - Windom Place, West of Connecticut Avenue  
Thursday, 22 May 2003

Superintendent Coleman and Chief Planner Gregerson:

I am David J. Bardin, Secretary of Advisory Neighborhood Commission 3F, appearing on behalf of our ANC which serves this neighborhood, in which we meet tonight. Welcome.

ANC 3F also includes the portion of Rock Creek Park west of Rock Creek, South of Military Road, N.W. and north of Tilden Street, N.W. including most of Melvin Hazen Park and all of Soapstone Valley Park. It includes such landmarks as the Peirce Mill.

ANC 3F adopted the attached resolution on Monday, May 19 and we appreciate Superintendent Coleman's attendance at that ANC meeting. Our Chair, Cathy Wiss (who is out of town today, as is Commissioner Maudlin who moved the Resolution), delivered our Resolution to Rock Creek Park (RCP) Headquarters on Tuesday for inclusion in the record in its entirety.

Our Resolution refers to the 1890 legislation establishing RCP as stating that it "be perpetually dedicated and set apart . . . for the benefit and enjoyment of the people of the United States"; and directing park managers to provide for public recreation, and specifically to "lay out and prepare roadways and bridle paths, to be used for driving and for horseback riding, respectively, and footways for pedestrians." It reviews the NPS alternatives and resolves three things:

**BE IT RESOLVED THAT:** ANC 3F recommends that the National Park Service adopt **Alternative B: Continue current management/No action; and**

**BE IT FURTHER RESOLVED THAT:** ANC 3F recommends that the National Park Service adopt the proposals in Alternatives A, C and D to (a) upgrade park trails, (b) increase use of park historic resources for interpretive and educational purposes, (c) improve park introduction and information services, and (d) relocate park administrative facilities and U.S. Park Police substation outside the park, and

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

We understand that July 15, 2003, is the deadline for further submittals in writing.

If time permits, I would like to present my supplemental, individual views [attached] concerning looting and degradation of Park land, full restoration of Peirce Mill, access to RCP via Soapstone Valley Park (as well as analyses of Beach Drive uses and restrictions).

ROCR 2987  
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Res 03-08

ANC 3F RESOLUTION REGARDING THE DRAFT  
GENERAL MANAGEMENT PLAN, ENVIRONMENTAL IMPACT STATEMENT  
ROCK CREEK PARK AND THE ROCK CREEK AND THE POTOMAC PARKWAY

Advisory Neighborhood Commission 3F  
North Cleveland Park, Forest Hills & Tenleytown  
4401-A Connecticut Avenue, N.W., #244  
Washington, D.C. 20008-2322

WHEREAS: the 1890 legislation establishing Rock Creek Park stated that it "be perpetually dedicated and set apart . . . for the benefit and enjoyment of the people of the United States"; and

WHEREAS: the 1890 legislation directs park managers to provide for public recreation, and specifically to "lay out and prepare roadways and bridle paths, to be used for driving and for horseback riding, respectively, and footways for pedestrians."; and

WHEREAS: ANC 3F includes the portion of Rock Creek Park west of Rock Creek, South of Military Road, N.W. and north of Tilden Street, N.W. including Melvin Hazen Park and Soapstone Valley Park ; and

WHEREAS: the Draft General Management Plan, Environmental Impact Statement for Rock Creek Park and the Rock Creek and Potomac Parkway provides four alternations for consideration:

- Alternative A: Improved management of established park uses.
- Alternative B: Continue current management/No action.
- Alternative C: Nonmotorized recreation emphasis.
- Alternative D: Mid-weekday recreation enhancement; and

WHEREAS: the major difference between the four alternatives is traffic management measures; and

WHEREAS: alternatives A, C and D would divert traffic that would use park roads under alternative B onto nearby residential and other street; and

WHEREAS: alternatives C and D would eliminate or reduce the traditional visitor experience of automobile touring along the length of the park, including the gorge area, which would be a major adverse effect on traditional park character and visitor experience; and

WHEREAS: under alternative A, two road segments would have noticeable degraded level of service (LOS), with associated adverse effects on community character; and

WHEREAS: the current mix of recreational and nonrecreational use of the park and parkway, including urban traffic, is appropriate and enhances the quality of life in the city and surrounding region; and

WHEREAS: the analysis of the environmental consequences found that all alternatives would have fairly similar effects on air quality, water quality and hydrology of Rock Creek and its tributaries, wetlands and floodplains, deciduous forests, and protected and rare species; and

WHEREAS: Rock Creek Park and the Rock Creek and Potomac Parkway do not have any special mandates that would affect this general management plan and future planning activities; and

WHEREAS: without a General Management Plan, The National Park Service will continue to strive to implement service wide legal mandates and policies including natural resource management, cultural resource management, special use management and visitor experience and park use requirements; and

WHEREAS: Alternatives A, C and D include:

- Upgrading recreation trails.
- Increasing use of park historic resources for interpretive and educational purposes.
- Improving park introduction and information services.
- Relocating park administrative facilities and U.S. Park Police substation outside the park;

THEREFORE BE IT RESOLVED THAT; ANC 3F recommends that the National Park Service adopt Alternative B: Continue current management/No action; and

BE IT FURTHER RESOLVED THAT: ANC 3F recommends that the National Park Service adopt the proposals in Alternatives A, C and D to (a) upgrade park trails, (b) increase use of park historic resources for interpretive and educational purposes, (c) improve park introduction and information services, and (d) relocate park administrative facilities and U.S. Park Police substation outside the park, and

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

Approved by a vote of 6-0-1 at a duly noticed public meeting on May 19, 2003, with a quorum present.

  
Cathy Wiss, Chair

  
David J. Bardin, Secretary

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ROCR 2859  
Page 1 of 4

*Robert D. Stiehler*  
3234 Quesada Street, N.W.  
Washington, DC 20015-1663  
Phone: 202-537-1859

2002 March 2

Advisory Neighborhood Commission 3 & 4 G  
Chevy Chase Community Center  
Connecticut Avenue & McKinley Street, N.W.  
Washington, DC 20015

There has been a lot of conjecture pro and con about closing portions of Beach Drive in Rock Creek Park during weekday non-rush hours. Those favoring closure cite the recreational activities on Beach Drive during weekends and holidays. Those opposing closure discredit this analogy since most residents have weekends and holidays free and are not free to use the park during the week. Further, they fear the impact of traffic on neighboring streets such as Sixteenth Street, and Oregon Avenue if Beach Drive were closed on weekdays. Neither side has the facts, causing a lot of time to be wasted in polemics.

The facts can be obtained by a six-month trial closing of Beach Drive on weekdays during non-rush hours. The months of May through October are suggested to cover the three summer months when most school children are on vacation and many adults take their vacations during this period. During most of May, September, and October, few are free to use the park on weekdays. Data collected during the six-month period allow sound decisions to be made.

The six-month trial allows one of the following three obvious choices to be made:

- Close Beach Drive during non-rush hours on weekdays all year.
- Close Beach Drive during non-rush hours only from Decoration Day in May to Labor Day in September.
- Do not close Beach Drive during weekdays because of the impact of traffic on streets near Rock Creek Park.

ANC 3&4 G is urged to request National Capital Parks to conduct a six-month trial closing of Beach Drive during weekday non-rush hours this year, and to collect the data needed for making prudent decisions on park management.

*Robert D. Stiehler*  
Robert D. Stiehler  
cc  
Adrienne Coleman  
Adrian Fenty  
Kathleen Paterson

**3/4G** Chevy Chase  
Advisory Neighborhood Commission 3/4G  
MAILING ADDRESS: P.O. BOX 6252 Northwest Station Washington, DC 20015

CHEVY CHASE OFFICE  
5601 Connecticut Ave. NW  
Washington, DC 20015  
(202) 363-5803  
FAX (202) 686-4366  
E-mail uppernwdc@juno.com

June 10, 2003

Mr. John G. Parsons  
Assoc. Regional Director  
National Park Service  
1100 Ohio Drive, SW  
Washington, DC 20242

Superintendent Adrienne A. Coleman  
Rock Creek Park  
National Park Service  
3545 Williamsburg Lane, NW  
Washington, DC 20008-1207

**RE: DRAFT GENERAL MANAGEMENT PLAN/  
ENVIRONMENTAL IMPACT STATEMENT**

Dear Superintendent Coleman and Mr. Parsons:

At its June 9, 2003 public meeting, the Chevy Chase Advisory Neighborhood Commission (ANC 3/4G), representing 14,000 upper north-west DC residents in Wards 3 and 4, voted 5 to 2 (a quorum being 4) to support *Alternative B, the no action alternative* as outlined in the draft General Management Plan of Rock Creek Park.

It is clear to ANC 3/4G that there is no consensus on the most important issue of closing Beach Drive on weekdays from 9:30 AM to 3:30 PM. Motorists want to continue using the road as a scenic and convenient route through Rock Creek Park. Residents on both sides of the Park and six Advisory Neighborhood Commissions do not want traffic (up to 2,500 vehicles/day) diverted into their neighborhoods. Senior citizens and the handicapped require weekday vehicular access to upper Beach Drive, the upkeep of which is paid for by federal funds. DC's Mayor believes that the closure of Beach Drive will interfere with emergency evacuation. Moreover, multi-year accident data provided by the U.S. Park Police (at ANC 3/4G's request) does not support any claim that upper Beach Drive is a dangerous road on weekdays, during non-rush hours, thus necessitating a ban on vehicular travel through the Park to safeguard relatively few cyclists, runners and hikers.

(continued)



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Superintendent Adrienne Coleman and John Parsons  
June 10, 2003  
Page 2

In addition, the draft Environmental Impact Statement asserts that a Beach Drive closure would:

- Have negligible effects on air and water quality;
- Have negligible impact on reductions in mortality for all park species;
- Not have a noticeable effect on rush hour volume;
- Confuse motorists who would have to detour around the closed sections;
- Have minor effects on traffic safety; and
- Endanger visitors with limited mobility or small children when closed segments are reopened.

For the above reasons, ANC 3/4G endorses *ALTERNATIVE B*. The Commission urges Rock Creek Park officials not to discriminate against the overwhelming majority (vehicular use) in order to accommodate a small minority (weekday recreation enthusiasts). Most local residents simply do not have the time to use the Park during the week because of work and school commitments.

In closing, the Commission thanks Superintendent Coleman for participating in its May 12 public meeting on the General Management Plan and appreciates the May 16 follow-up letter clarifying that the National Park Service (NPS) does not plan to close Bingham and Sherrill Drives on weekdays.

Sincerely yours,

  
Anne Mohnkern Rehshaw  
Chairman, ANC 3/4G

cc: Mayor Anthony Williams  
Councilmember Kathy Patterson  
Councilmember Adrian Fenty  
Terry Carlstrom, Regional Director, NPS  
Michael F. Byrne, Director, Office for National Capital Region Coordination,  
U.S. Department of Homeland Security  
Chairs, ANCs 3F, 4A, 4B, 4C, 4D  
Commander Jeffrey Moore, 2D, MPD  
Lt. G. William Davis, Commander, District Three, Rock Creek Sub-Station,  
U.S. Park Police

(Note: ANC 3/4G previously forwarded to RCP 484 signatures on letters and petitions from constituents within ANC 3/4G and 4A who want the present traffic patterns through Rock Creek Park maintained.)

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Page 3 of 4

**3/4G** Chevy Chase  
Advisory Neighborhood Commission 3/4G  
MAILING ADDRESS: P.O. BOX 6252 Northwest Station Washington, DC 20015  
  
CHEVY CHASE OFFICE  
5601 Connecticut Ave. NW  
Washington, DC 20015  
(202) 363-5803  
FAX (202) 686-4366  
E-mail: uppermwdc@juno.com

June 10, 2003

VIA FAX: 202-282-8404  
(Original sent by mail.)

Mr. Michael F. Byrne  
Director  
Office for National Capital Region Coordination  
U.S. Department of Homeland Security  
Washington, DC 20528

RE: DC EVACUATION - PROPOSED BEACH DRIVE WEEKDAY CLOSURE

Dear Mr. Byrne:

As you may be aware, the National Park Service (NPS) is contemplating closing upper Beach Drive through Rock Creek Park (RCP) during the week from 9:30 AM to 3:30 PM to accommodate a small number of recreation enthusiasts. This is not a good idea for many reasons, one of which has to do with an emergency evacuation of DC when all roads, including Beach Drive, will be clogged with drivers trying to leave the area.

While upper Beach Drive may not be designated a principal evacuation route, it is the only north-south limited access road between Canal Road and North Capitol Street. Beach Drive feeds into Rock Creek Parkway which handles such a volume of weekday rush hour traffic that its lanes are made one way to accommodate and expedite the flow of traffic traveling to or from downtown DC during AM and PM rush hours. Many of those vehicles would head for Beach Drive in an emergency.

If an urgent situation occurred during the week, necessitating a mass evacuation of vehicles from downtown, as many as six gates would block vehicles from using Beach Drive until the gates would be manually opened by Park Police and/or RCP workers (the exact plan, we understand, has not been finalized). It currently takes Park Police 30 minutes to reopen the gates and clear Beach Drive after the weekend closing.

(continued)

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Michael F. Byrne  
June 10, 2003  
Page 2

### ***Advisory Neighborhood Commission 4A***

DISTRICT OF COLUMBIA GOVERNMENT  
7600 GEORGIA AVENUE NW, SUITE 404  
WASHINGTON, DC 20021  
(202) 291-9341

ANC 3/4G supports Alternative B, outlined in the draft General Management Plan as the "no action" alternative. In other words, ANC 3/4G wants Beach Drive to remain as now configured, open to vehicles during weekdays.

ANC 3/4G hopes that you have a voice in keeping Beach Drive open to vehicular traffic during the non-rush hour weekday period. Beach Drive is an important, if not officially designated, evacuation route. In a post 9-11 era, homeland security must take precedence over recreation.

Sincerely yours,



Anne Mohnkern Renshaw  
Chairman, ANC 3/4G

cc: Mayor Anthony Williams  
Councilmember Kathy Patterson  
Councilmember Adrian Fenty  
Terry Carlstrom, Regional Director, NPS  
John G. Parsons, Assoc. Regional Director, NPS  
Superintendent Adrienne A. Coleman, Rock Creek Park  
Chairs, ANCs 3F, 4A, 4B, 4C, 4D  
Commander Jeffrey Moore, 2D, MPD  
Lt. G. William Davis, Commander, District Three, Rock Creek Sub-Station,  
U.S. Park Police

Note: This letter was approved by a vote of 4 to 3 (a quorum being 4) at the June 9, 2003 public meeting of ANC 3/4G.

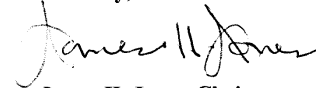
May 23, 2003

Ms. Adrienne Coleman, Superintendent  
Rock Creek Park, NPS  
3545 Williamsburg Lane NW  
Washington, DC 20008

Dear Ms. Coleman:

The Advisory Neighborhood Commission 4A appreciates the opportunity to comment on the Rock Creek Park General Management Plan. Please be advised that the Commission (ANC) 4A supports Alternative B which requires no actions and opposes all other alternatives that propose closing Beach Drive to automobile traffic. ANC 4A Commissioners unanimously adopted a resolution to that effect at its monthly public meeting on May 6, 2003. The resolution is attached to this correspondence.

Sincerely,



James H. Jones, Chairman  
Advisory Neighborhood Commission 4A

Attachment

BY:

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ROCR 3100  
Page 1 of 1

**ADVISORY NEIGHBORHOOD COMMISSION 4A**  
May 6, 2003

**RESOLUTION**

*Opposing any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic*

**WHEREAS**, The Environmental Impact Statement and General Management Plan evaluates the following four alternatives for Rock Creek Park: (1) *Alternative A* would generally retain the current scope of visitor uses with improvements in visitor safety, better control of traffic volumes and speeds through the Park; (2) *Alternative B* would propose no actions at all; (3) *Alternative C* proposes to close three sections of Beach Drive to automobiles *at all times* and, thereby, eliminate traffic in much of the northern part of the Park; (4) *Alternative D* proposes to close three segments of Beach Drive in the northern portion of the Park to motorized vehicles *for a 6-hour period, from 9:30 a.m., to 3:30 p.m., on weekdays*.

**WHEREAS**, *Alternative D*, which only completely opens Beach Drive during rush hours, has an unfair discriminatory effect in that on the one hand, it would facilitate access through the Park to commuter traffic; however, on the other hand, it would prohibit access both through and across the Park to local residents during non-rush hour times. This alternative would have a further adverse effect on local residents both east and west of the park because residents would no longer be able to traverse the Park through local streets as is customary, but would be forced to go miles out of their way, even into Maryland in order to reach either side of the Park.

**WHEREAS**, *Alternatives C and D* prohibit access to Beach Drive from most roads and increase traffic on streets that are already heavily trafficked such as 16<sup>th</sup> Street NW, 14<sup>th</sup> Street NW, Military Road, Piney Branch Parkway and 13<sup>th</sup> Street, Park Road, and Blagden Avenue.

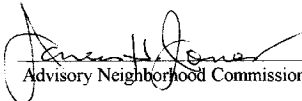
**WHEREAS**, The proposal, by prohibiting automobile access to the park, blocks access to emergency evacuation routes at Rock Creek Parkway and George Washington Parkway.

**WHEREAS**, The proposal, by prohibiting automobile access to the park, benefits the young and mobile but penalizes many Seniors, the handicapped, small children and others with mobility challenges from using the park.

**THEREFORE, BE IT RESOLVED**, That Advisory Neighborhood Commission 4A opposes any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic.

**FURTHER, BE IT RESOLVED**, That Advisory Neighborhood Commission 4A supports *Alternative B* in the General Management Plan which proposes no actions or changes at all.

Approved at a duly noticed meeting on May 6, 2003, with a quorum present.

 \_\_\_\_\_, Chairman  
Advisory Neighborhood Commission 4A

MR. SHEPPERD: Good evening. My name is Gregory Shepperd, I live in D.C. I'm the Vice Chairman of the Advisory Neighborhood Commission 4A, which is comprised of 8 single member districts representing approximately 18,000 residents in this upper Northwest community, which abuts and includes Rock Creek Park. I appreciate the opportunity to comment on the National Park Service general management plan.

At a duly noted meeting on May 6, 2003 and with a quorum present ANC-4A Commissioners unanimously adopted the resolution to oppose any and all changes in the Rock Creek Park general management plan that proposed to close Beach Drive to automobile traffic, and further to support alternative A in the general management plan which proposed no actions at all.

We observed that by prohibiting automobile access to the park alternative C and D would prohibit access to Beach Drive from most roads and increase traffic on streets that are already heavily trafficked, such as 16<sup>th</sup> Street Northwest, 14<sup>th</sup> Street Northwest, Military Road, Piney Branch Parkway, 13<sup>th</sup> Street, Park Road and Blagden Avenue.

Further, alternatives C and D would block access to emergency evaluation routes at Rock Creek Parkway and operate to benefit young and mobile and penalize many seniors, the handicapped, small children and others with mobility challenges from using the park.

Alternative D, which only opens Beach Drive during rush hours has an unfair discriminatory effect. It would allow access through the park to commuter traffic during rush hours, but not prohibit access—but would prohibit access to local residents during non rush hour times. For these reasons ANC-4A opposes any and all changes that will result in closing Beach Drive. We therefore support alternative B, which proposes no actions at all.

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

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MS. JONES: My name is James H. Jones. I'm the President of the Crestwood Neighborhood League, a community that abuts and includes Rock Creek Park. I'm also the Chair of the ANC-4A. Both organizations adopted resolution #B to oppose and all changes in Rock Creek Park.

I'm here tonight to represent the Crestwood League.

I feel that the general management plan as presented by the Park Service is a simulation, doesn't fully disclose the objectives of the Park Service. The name of the simulation is access control. The purpose of the game is to gain control of the roadways and thoroughfares in Rock Creek Park.

The players, those favoring an open system and those favoring the bicycle system. The open system, when Congress defined and dedicated Rock Creek Park in 1890 it established an open system with roadways for the purpose of driving, bridle paths for horseback riding and foot paths for pedestrians. Proponents of the system include residents, community organizations, ANC, commuters, enlightened government officials. Bicycle system, the proponents are the People's Alliance for the Park, Washington Area Bicycle Association and also the National Park Service, as evidenced by its preference to D, which would exclude automobiles from the park.

The game did not start today. It didn't start 7 years ago. The struggle started back in the '60s with the resurgence of the popularity of bicycles as a mode of transportation. At that time the proponents of the bicycle system began to lobby and influence the policies of the park. Park management made its first special accommodation to the bicycle people by preserving or reserving Ross Drive for bicycle use and prohibiting automobiles.

In 1966 the section of Beach Drive from Joyce Road to Broad Branch was limited to bicycles and pedestrian traffic on Sunday mornings and later extended to Murray Drive. By the fall 3? miles of trail had been reserved for bicycle use.

It was found, however, that the closed roads did not justify the closure. Motorists complained and management changed the policy.

In the '70s the bicycle system prevailed even more. They were successful in getting Park Service to set aside a lane in Rock Creek Park and Potomac Park for a week so that people could commute by bicycle. The experiment failed. There were massive traffic tie ups and people complained.

The Park Service also did some other things, too. One of the management objectives in 1977 was that the objective was to improve the quality of the visitor's experience by reducing excessive automobile commuter traffic on the roads within Rock Creek Park and encourage the shift to such traffic to mass transit, bicycles and other forms. They also had a study in 1980 which has been referred to and one of the alternatives was to build 5? miles of new bicycle trail paralleling Beach Drive and having no impact on automobile traffic. You would think that this would be one of the alternative today, but it's not. It should be, and I recommend it.

I would hope that the Park Service would not use this as an opportunity for this plan to disguise its objectives and try to select the bicycle system over the open system. It would be a mistake.

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE. N.W.

WASHINGTON, D.C. 20005-3701

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Page 1 of 2

**ADVISORY NEIGHBORHOOD COMMISSION 4C**  
**May 13, 2003**

**RESOLUTION**

**Opposing any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic.**

WHEREAS, The National Park Service, Department of Interior, announced in the Federal Register on March 14, 2003, the availability of a draft Environmental Impact Statement and General Management Plan for Rock Creek Park, Washington, DC.

WHEREAS, The Environmental Impact Statement and General Management Plan evaluates the following four alternatives for Rock Creek Park: (1) Alternative A would generally retain the current scope of visitor uses with improvements in visitor safety, better control of traffic volumes and speeds through the Park; (2) Alternative B would propose no actions at all; (3) Alternative C proposes to close three sections of Beach Drive to automobiles at all times and, thereby, eliminate traffic in much of the northern part of the Park; (4) Alternative D proposes to close three segments of Beach Drive in the northern portion of the Park to motorized vehicles for a 6-hour period, from 9:30 a.m., to 3:30 p.m., on weekdays.

WHEREAS, Alternative D, which only completely opens Beach Drive at rush hour times, would facilitate commuter access through the Park but would have an adverse effect on local motorists and residents east and west of Rock Creek Park who will no longer be able to traverse the Park through local streets. They would be forced to go miles out of their way, even into Maryland in order to reach either side of the park.

WHEREAS, Alternatives C and D prohibit access to Beach Drive from most roads and increase traffic on streets that are already heavily trafficked such as 16th Street NW, 14th Street NW, Military Road, Piney Branch Parkway and 13th Street, Park Road, and Blagden Avenue.

MAY 21 2003

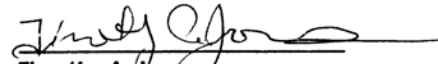
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WHEREAS, The proposal, by prohibiting automobile access to the park, benefits the young and mobile but penalizes many Seniors, the handicapped, small children and others with mobility challenges from using the park.

WHEREAS, The proposal, by prohibiting automobile access to the park, blocks access to emergency evacuation routes at Rock Creek Park and George Washington Parkway.

THEREFORE, it is Resolved, That the Advisory Neighborhood Commission opposes any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic.

Approved at a duly noticed meeting on May 13, 2003, with a quorum present.

  
Timothy A. Jones  
Chairman  
Advisory Neighborhood Commission 4C

  
Kristen L. Barden  
Secretary AUC 4C

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ROCR 0425  
Page 1 of 2

Subject: American Discovery Trail support for Bike/Ped Plans

Dear Ms Adrienne Coleman,

As you may know the National American Discovery Trail ([www.discoverytrail.org](http://www.discoverytrail.org)) enters Rock Creek Park at Joyce Rd. and utilizes park trails all the way to Georgetown. We are also very interested in going north from Joyce Road to the recently opened trestle bridge and then utilizing the Capital Crescent Trail as an alternate way to get to the C&O Canal towpath and points west.

The American Discovery Trail is the nation's first non-motorized coast to coast recreational trail. Many of our users are from smaller towns and are intimidated by the traffic, and its attendant dangers, in a big city. Your approaches to the traffic problem would go a long way to alleviate this concern.

We strongly support your group's efforts to make the park more safe for bicyclists and pedestrians.

Harry Cyphers  
MD/DC Coordinator for the American Discovery Trail

July 15, 2003

Adrienne Applewhaite-Coleman, Superintendent  
Rock Creek Park Headquarters  
3545 Williamsburg Lane, NW  
Washington, DC 20008

Dear Superintendent Coleman:

I am writing on behalf of American Hiking Society (AHS) to comment on the new National Park Service's (NPS) proposed General Management Plan for Rock Creek Park. We urge the NPS to select its preferred Alternative D, Mid-Weekday Recreation Enhancement, to create a safe, tranquil recreation haven that can be accessed and enjoyed by millions of residents and visitors to the metropolitan area.

Mid-weekday car-free zones will offer area residents a peaceful escape from the hectic urban landscape and provide the opportunity for safe leisurely recreation in a wooded environment where a parallel trail is precluded by the park's topography. The limited road closures under Alternative D, combined with enhanced interpretation and educational opportunities, will protect and promote the natural ecology of the park, which in turn will enhance visitors' experiences and foster a greater appreciation for this unique natural, cultural, and recreational resource.

Increased access and implementing tighter traffic control measures throughout the park will promote the health and safety of recreational users and non-motorized commuters. Safety improvements may lead to increased commuting through the park on bicycle or foot. Increased access to the park also helps address a growing national public health crisis. Seventy-five percent of Americans get too little physical activity, 64% are overweight, and over 30% are obese. By increasing physical activity, activities such as walking, hiking, and bicycling reduce the risk of life-threatening diseases such as heart disease, diabetes, cancer, and other serious medical conditions.

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ROCR 3022  
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Of the proposed management plans, Alternative D best supports our belief that Rock Creek Park is a unique amenity that greatly enhances the quality of life in the Washington, DC area. Alternative D also extends recreation opportunities in the park through the construction, rehabilitation, or upgrading of at least 10 miles of recreational trails. The park's recreation zones contribute to a growing network of regional trails that make the metropolitan area a desirable place to live and visit.

As the national voice for America's hikers, AHS promotes and protects foot trails and the hiking experience. AHS represents its 5,000 individual members as well as the volunteers and members of its 160 member organizations ? including many in the DC area ? and is the only national organization dedicated to establishing, protecting and maintaining America's foot trails. We urge you to select Alternative D in order to protect this beautiful stretch of Rock Creek Park for the recreation enthusiasts of today and of future generations. Thank you for the opportunity to comment.

Sincerely,

Celina Montorfano, Director of Conservation Programs  
American Hiking Society  
1422 Fenwick Lane  
Silver Spring, MD 20910  
CMontorfano@AmericanHiking.org  
www.AmericanHiking.org



1424 Fenwick Lane / Silver Spring, MD 20910  
PHONE 301-589-9453 FAX 301-565-6714  
www.americanwhitewater.org

Adrienne Coleman, Superintendent  
3545 Williamsburg Lane NW  
Washington, D.C. 20008-1207  
202/282-1063

April 22, 2003

Dear Superintendent Coleman

I am writing on behalf of American Whitewater, a national non-profit organization that represents river recreationists. We have communicated with you, your staff, and your predecessors several times in the past regarding canoe and kayak access to Rock Creek.

We are concerned that the Draft General Management Plan for Rock Creek Park and the Rock Creek and Potomac Parkway does not appear to include any management statements regarding recreational use of Rock Creek through Rock Creek Park.

As the Plan is intended to provide comprehensive guidance on management actions, recreation, environmental conditions, and visitor use of the Park, it is surprising that the Draft EIS omits any reference to either the public's or Park's interest in managing the waters of Rock Creek. This is of concern for several reasons:

First, because American Whitewater asked in 1999 and 2000, and received verbal assurances, that the topic would be addressed in this management plan.

Second, because there is a documented history of institutional forgetfulness among the Park Police regarding historic agreements over the Superintendent's policy to allow canoeing and kayaking.

Third, because the continuing issues of water quality and sanitation are not addressed in the planning document. The namesake creek for the Park, Rock Creek, is regularly subjected to sewage overflows and urban runoff. It is a tragedy of the first order that the primary river in our Nation's Capitol<sup>1</sup> is not better protected and that the Park Service is not doing more to recognize the problem and improve sanitation such that other recreation activities such as fishing and wading may be permitted in the Park.

Rock Creek is a unique urban sanctuary for recreationists and nature lovers within the city. It offers people the chance to hike, jog, bike, rollerblade, tour, and picnic on a daily

<sup>1</sup> The Potomac does not fall within Washington, DC's jurisdiction and is owned by the State of Maryland.

basis. It also offers limited opportunities for cross country skiing, canoeing, kayaking, climbing and even ice-skating depending on the weather and season.

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

I personally have enjoyed paddling the creek at both low and high levels, and have paddled the creek on multiple occasions when Beech Drive was closed due to flooding. The relative dangers were not appreciably different at the two levels and no rapid exceeded Class III with the exception of the waterfall at Pierce Mill. I found that the primary difference in the two levels was that there was less urban debris at the higher flows, and I didn't have to scratch the bottom of my boat on shallower segments.

In terms of safety, most boaters use lifejackets, helmets, and floatation when boating whitewater rivers. Boaters also tend to carry safety throw ropes, safety knives, safety whistles, and first aid kits. While the use of this equipment does not guarantee boater safety, it helps to mitigate the risk of the sport. Regardless, whitewater canoeing and kayaking are relatively safe and are comparable in risk to mountain biking.

There is a long tradition of boating on Rock Creek. While float permits were required for several years, the permit restriction was lifted in 1986. Since then American Whitewater estimates that a few thousand boaters have floated through Rock Creek without incident. For further information on the history of boating in the Park I encourage you to begin by reviewing Superintendent Ellard's 1987 letter to Ron Knipling [L30(NCR-ROCR)] in which Ellard states that "There is no longer a requirement for a boating permit..."

According to the published notes by Lt. Berberich of a Rock Creek Park Staff meeting in on April 27, 1993, "Kayaking is permitted on Rock Creek- no permit needed. USPP requested that a warning sign be placed along the creek to warn of Pierce Mill Falls ahead. Park stated that they would look at it." Lt. Kass forwarded this document to American Whitewater in March 2002, including the handwritten statement that "The current superintendent has continued this policy".

I have attached a timeline that American Whitewater has reconstructed of the major management points affecting river access on Rock Creek. This timeline clearly demonstrates that kayaking and canoeing are long established uses in the park and have been recognized as appropriate activities within Rock Creek. The document shows that canoeing and kayaking have enjoyed the support of many Park Superintendents over the past 30 years; but it also shows that there is a major problem of institutional forgetfulness about these activities within the Park.

As Ed Gertler wrote in 1997, "Because of the regular turnover in management and subsequent disruption in institutional memory, we are always concerned that our privileges might be disrupted by new management personnel who are unfamiliar with our activity and our good record as responsible users."

### Boating Timeline

- |                   |  |
|-------------------|--|
| 1970              | Ed Gertler, Conservation Co-chair of the Canoe Cruisers Association, canoed on Rock Creek. Ed recalls that canoeing was already an established use in the Park before he first floated this creek.   |
| 1978              | Ed Gertler met with Superintendent James Redmond and drafted a river use permit. Superintendent Redmond adopted the boating permit for Rock Creek Park.  |
| May 10, 1978      | Superintendent Redmond writes (A9031-NCR-ROCR) to Ed Gertler detailing the basic elements of the river use permit.   |
| 1980's            | Boating use continued with periodic interference by Park Police who were not aware of Superintendent Redmond decision to authorize canoeing and kayaking on Rock Creek.  |
| February 13, 1987 | Superintendent Ellard wrote (L30-NCR-ROCR) to Mr. Ron Knipling and stated that "Due to changes in the United States Code of Federal Regulations which took effect on November 17, 1986, a canoe permit is no longer required in the National Capital Region of the National Park Service... Prior to November 17, 1986, the National Capital Region of the National Park Service was regulated by CFR 36; Part 50. To facilitate a consistent interpretation of laws concerning all National Park Service areas across the nation, we now use Part 7, CFR. There is no longer a requirement for a boating permit in this section." |
| 1989              | Ed Gertler asked Superintendent Swain if the permit system was still in effect. Superintendent Swain was unaware of the permit, but after reviewing applicable regulations stated that: a) he saw no reason to perpetuate such unnecessary paperwork, and b) that boating on Rock Creek should continue without permits.   |
| 1993              | Boaters were again harassed intermittently by Park Police.   |
| April 27, 1993    | Lt. Berberich's prepared notes for a Rock Creek Park Staff meeting state in item #3 that "Kayaking is permitted on Rock Creek- no permit needed. USPP requested that a warning sign be placed along the creek to warn of Pierce Mill Falls ahead. Park stated that they would look at it."   |
| May 22, 1993      | Ed Gertler wrote to Superintendent Shields and asked for a clarification on boating policy in Rock Creek.  |
| June, 1993        | Superintendent Shields responded in writing and stated that "I have coordinated our response and the National Park Service's position with the   |



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Park Police regarding paddle-type craft on the creek. There is no prohibition of kayaks and canoes on any section of Rock Creek that is under the jurisdiction of the National Park Service... We do recognize that boating is a compatible recreation activity in the park that should not be complicated or restrictive by a permit system unless future uses warrant... I hope that our position is clear on this issue."

- July 7, 1993 Ed Gertler thanks Superintendent Shields in a letter, and states that he will pass on the information to local clubs and boaters.
- July 24, 1997 Ed Gertler writes to Superintendent Coleman to request that boating be recognized as a compatible use of the park in future planning documents. Ed Gertler requests that "Because of the regular turnover in management and subsequent disruption in institutional memory, we are always concerned that our privileges might be disrupted by new management personnel who are unfamiliar with our activity and our good record as responsible users." Ed Gertler has no record of a response.
- September 17, 1999 Two canoers, Ron Knipling and Mark Halle, were asked to leave the river by Lieutenant Kass. The river was at a low/moderate level. An incident report was filed.
- October 1999 Two kayakers, Martin Radigan and a friend, were asked to leave the river by an unidentified officer. According to Lieutenant Kass no incident report was filed.
- October 18, 1999 Ronald Knipling, the president of the Blue Ridge Voyageurs Canoe Club, wrote to Superintendent Coleman about his encounter with Lieutenant Kass on September 17<sup>th</sup>, and asked for a resolution "in favor of unfettered access."
- October 26, 1999 Ron Knipling contacted American Whitewater, and American Whitewater's Access Director Jason Robertson wrote to Superintendent Coleman regarding continued support for boater access to Rock Creek.
- December 8, 1999 In response to a phone conversation with Assistant Superintendent Cindy Cox, American Whitewater faxed a letter to Assistant Superintendent Cox discussing the appropriateness of boating in Rock Creek. This fax included a copy of the October 26, 1999 letter to Superintendent Coleman.
- January 17<sup>th</sup>, 2000 In a phone conversation between American Whitewater and Lieutenant Kass, the Lieutenant explained that after reviewing Park records and speaking with Assistant Superintendent Cox, the current park administration would respect the former park supervisor's decisions and continue allowing unrestricted river access. The Park police would not restrict boater access to Rock Creek regardless of river level.
- January 17<sup>th</sup>, 2000 American Whitewater's Access Director, Jason Robertson, wrote to Assistant Superintendent Cox and Superintendent Coleman describing the content of the morning's conversation with Lieutenant Kass and requested written confirmation of the boating policy. Based on discussions

with Lieutenant Kass, it was American Whitewater's understanding that the Park Police would continue supporting the boating rights and privileges that the public has enjoyed for the last 13 years. In other words, experienced whitewater canoers and kayakers would continue being permitted to float the Class III (IV) creek, regardless of water level and that no special permits or permissions would be required. American Whitewater requested that future planning documents explicitly reflect that canoeing and kayaking recreation are permitted.

- February 19, 2000 Nick Lipkowski, an American Whitewater employee and member, was asked to leave the river by Officer Timothy McMorow (Badge # 475) because he believed that boating was not permitted. A second officer walked up during the conversation between Mr. Lipkowski and Officer McMorow. This other officer reportedly commented that even if boating were allowed, the park police wouldn't allow boaters on the river because it was too high. However, the river hydrograph indicates that the creek was at a minimum level for boating on the day of this incident and was not too high by any stretch of the imagination. This incident highlights the need for a clear policy statement on boating on the river, as well as a need for a formal education process for Park personnel on the public right to kayak and canoe Rock Creek. A policy statement is essential for securing our member's ability to enjoy the river as they have for more than 30 years, and avoiding the perennial public problems of addressing this use when new park staff are hired.
- March 2002 Lt. Kass forwarded Lt. Berberich's April 27, 1993 document to American Whitewater and included the signed and handwritten statement that "The current superintendent has continued this policy".

Rock Creek is one of the foremost urban parks in America. It has effectively addressed use and recreation in an urban setting for decades. The continued tradition of allowing boater access is essential to many visitors' enjoyment of the Park. It would be a tragedy for us to lose this opportunity through a misunderstanding of the visitor experience and management regulations.

In regard to water quality, in May 2001, Washington, DC's Health Commissioner, Dr. Ivan Walks, issued the warning that, "We are not recommending that people use Rock Creek and enter Rock Creek because of standing high bacteria levels..." Dr. Walks added that the bacteria levels in Rock Creek are too high for human contact, and had been for the last year. It is not acceptable that the largest river in the Nation's capitol is one of only a handful of rivers across the country for which there is a health warning. The Park must develop a planning mechanism for improving water quality throughout the Park and restoring the creek for fish health and viability, as well as public health.

American Whitewater encourages you to continue the tradition of working in partnership with the boating community and respect former Superintendent Ellard's sentiments by continuing to allow floating in Rock Creek National Park. We strongly encourage the

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Park to explicitly allow canoeing and kayaking in Rock Creek National Park within the General Management Plan.

Please call me at 301-589-9453 if you have any questions or would like clarification on any of the matters detailed above.

Sincerely,

Jason D. Robertson  
Access Director  
American Whitewater

CC: Mac Thornton, Spokesman, Canoe Cruisers  
Ron Knipling, President, Blue Ridge Voyageurs  
Martin Radigan, Co-founder, Potomac River Safety Group  
Ed Gertler, Author, Maryland and Delaware Canoe Trails

MR. DRYDEN: Good evening. My name is Steve Dryden, D-R-Y-D-E-N. I live in Bethesda. I'm here tonight to represent the Audubon Naturalist Society of the Central Atlantic States where I'm Media Director.

Autobon Naturalist Society is the oldest and the largest environmental group in the Washington area. We have about 10,000 members in the region. And we were founded in 1897, which makes us about as old as Rock Creek Park itself.

MS. BIRD: 1890.

MR. DRYDEN: Yes. Okay. You've got a few years on us.

In any event, we would like to voice our support for alternative D, the mid-weekday recreation enhancement.

We use Rock Creek Park as our outdoor classroom. Almost every month of the year we lead environmental education programs in Rock Creek Park. And in addition, many of our members use Rock Creek Park as a sanctuary where the beauty of the natural world provides a welcome antidote to the news of the day. Simply stated, Rock Creek Park is a Washington treasure.

Closing three segments of Beach Drive in the northern portion of the park to motorized vehicles for a 6 hour period would enhance the park experience for all types of park users. This schedule is similar to the plan that is place in Central Park in New York City for one. Given the encroachment by manmade objects and new construction on the edge of the watershed of Rock Creek and possible reopening of a certain road, alternative D is a reasonable compromise. It would allow for the needs of commuters and restore opportunities for park experiences during the period between rush hours.

We salute Mayor Williams for offering the idea of a compromise in his letter to the Park Service and we will be submitting a longer statement for the record shortly.

**NEAL R. GROSS**

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WASHINGTON, D.C. 20005-3701

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July 14, 2003

Adrienne Coleman  
Superintendent Rock Creek Park  
3545 Williamsburg Lane  
Washington, DC 20008-1207

Dear Ms. Coleman:

Thank you for the opportunity to provide written comments on the Draft General Management Plan and Environmental Impact Statement for Rock Creek Park and the Rock Creek and Potomac Parkway. Audubon Naturalist Society (ANS), with 10,000 members in the Washington, DC metropolitan area, considers Rock Creek Park to be a treasure, and our environmental education programs frequently make use of the park's habitat as an outdoor classroom.

ANS supports the continued operations of the community gardens, horse center, golf course, and the rehabilitation and improvement of the nature center and planetarium. We support the draft's amplification of the establishing legislation's definition of "timber" as an essential resource in the park. In today's context, the forest community is a more preferred term to describe the value of the largest forest in the District of Columbia-Rock Creek Park.

We support continued measures to contain the threat of invasive exotic species, although we would prefer that it be formulated under the principles of integrated pest management. That would place the selective application of herbicides in limited portions of the park as a last resort after less toxic alternatives have been evaluated.

We support the National Park Service's preferred alternative of closing portions of Beach Drive near the Maryland border during non-rush periods on weekdays under the following conditions:

The weekday closure is done on a trial basis;

The plan for additional signs and maps of alternative routes is presented at a public meeting before the trial begins;

Data is collected on public use during the trial period to help determine whether the trial should be continued.

While ANS supports the above proposal, we are deeply concerned that almost all of the public comment generated on the draft management plan has been related to the transportation issues, and that the plan itself is dominated by descriptions of various transportation alternatives and their various impacts. Far too little attention has been directed at the primary importance of protecting Rock Creek Park's biological integrity.

Audubon Naturalist Society believes that the protection and restoration of the natural resources of Rock Creek Park should be the primary objective of the draft general management plan and environmental impact statement. Unfortunately, this draft inadequately assesses the existing conditions of park resources and falls far short of providing the management directions needed to protect and restore park natural resources in the future.

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

Just a few weeks ago, I received the latest newsletter from NPS' Center for Urban Ecology. Research efforts to assess park resource trends were well described in the publication. Most of the work is taking place in other national parks. Why not start comprehensive efforts in Rock Creek Park?

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

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The draft plan indicates that the National Park Service has begun implementing recommended best management plans for controlling nonpoint water pollution problems associated with various park land uses. But the consistent failure of the surface waters in the park to meet water quality standards continues to be an unacceptable embarrassment for all of us who inhabit the watershed (see page 120 and 123). I do not agree with the draft's conclusion that water quality concerns in Rock Creek have "stabilized." No data is provided to support this conclusion. In fact, the assessment of conditions in Montgomery County found the section of Rock Creek south of Rockville to have fair to poor stream and habitat conditions. "Bank stability problems and high levels of sediment deposition impair the biological community," is how the county's Department of Environmental Protection characterizes the watershed just upstream of the District line. Further, the recent decision by the Maryland Department of the Environment to issue a permit for an expanded horse stable operation at the Meadowbrook facility in the Rock Creek flood plain poses an additional potential pollution threat.

Since 1993, ANS has sponsored a citizen water quality-monitoring program that monitors three tributary sites within the boundaries of the national park (Pinehurst tributary, Normanstone Run, and Haven Run). Unfortunately, our advocacy program often uses Rock Creek within the national park as an example of a degraded aquatic system in need of restoration. Blockages to fish passage, combined sewer overflows, and PCB, chlordane, and mercury contamination contribute to the cumulative problem. Among other measures, we would strongly support putting additional signs along Rock Creek that warn of the human dangers in consuming bottom-feeding fish because toxic contamination.

Wetlands are critical habitat for many wildlife species. They are essential as breeding areas for amphibian populations in Rock Creek Park. No net loss of wetland functions has been the goal of the Chesapeake Bay Program for many years. What management plans are being considered in Rock Creek Park to offer greater protection to existing wetlands? In addition, are there areas in the Park where the conditions are appropriate for restoring wetland function? Has the National Park Service conducted a thorough investigation of all seeps and springs within Rock Creek Park as a critical step towards offering them additional protection from park development projects?

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

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

A healthy forest is essential to wildlife abundance and diversity. A frequent destination for ANS forays is the "best warbler trap" in the city--the high ridgeline that borders the west bank of Rock Creek between Broad Branch and Military Roads. A long-term study of bird populations in Rock Creek Park, conducted by ANS since the 1950s, supports other scientific assessments that show a marked decline in the populations of neo-tropical migrants.

For more than 100 years, Washingtonians of all social strata have experienced the beauty of Rock Creek Park, but the draft general management plan reveals that there is no interpretive plan to guide interpretive programming in Rock Creek Park and that many opportunities for reaching the public in the park are unrealized. The Park has many lessons to teach--and the public, many to learn. Now is the time for the Service to make a commitment to completing an interpretive plan.

As the pace of development in the Washington metropolitan area continues, the value of protected natural areas will grow. Audubon Naturalist Society pledges our continued support for the National Park Service's role as diligent steward of the park's natural resources.

Sincerely,  
Neal Fitzpatrick  
Executive Director  
Audubon Naturalist Society

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**Comments:** On behalf of the Board of Directors of the Audubon Society of the District of Columbia, I am writing to express our opposition to Alternative A of the Draft General Management Plan/Environmental Impact Statement for Rock Creek Park, in particular the proposal to build new administrative offices in the Maintenance Yard area (p. 76). Birders who know the park well know this is an important stopping point for many species of neotropical migratory birds--birds whose future is in doubt due to loss of habitat and other environmental pressures. Claudia Wilds, in her classic book, "Finding Birds in the National Capital Area," singled out the Maintenance Yard area as one of the best places in the city to see these birds. They do a great service to the trees in the park by reducing insect infestation-by as much as 50% according to scientific studies.

The long term future of the park, we believe, depends on careful management of the natural resources of the park, including its bird life. In our view, new construction in this environmentally sensitive area would have a very negative and disruptive effect on the park generally and in particular on the birds of the park, especially those most vulnerable to the destruction of an important feeding and resting area.

All residents of the District who look to the park as a green refuge from city pressures would certainly be impacted as well. I can tell you that our membership is very opposed to such a plan.

Thank you for this opportunity to comment.

Paul DeAnna  
Board of Directors  
Audubon Society of the District of Columbia

Subject: Do not close Beach Drive!!!

National Park Superintendent Adrienne Coleman  
Rock Creek Park  
3545 Williamsburg Lane NW  
Washington, DC 20008

Dear National Park Superintendent Adrienne Coleman,

It is totally a bad idea to close the Beach Drive.

Beach Drive is a very important artery, which links I-66 to the Maryland line. We can avoid the terrible traffic of Wisconsin Ave or Connecticut Ave by using Beach Drive. Otherwise we have to detour through GW Parkway or Canal Road, then I-495 to get to the Maryland line from Virginia. We think, no daily commuter between VA and Silver Spring will support the idea to close Beach Drive.

The need to recreation is important; but when it is at odds with the need for the working class to commute, we have to prefer the need of commuters. Visiting the park won't bring home the bread.

So we strongly oppose the idea to close Beach Drive!

Beach Drive Commuters Alliance  
Sincerely,

Beach Drive Commuters Alliance  
District of Columbia 20001

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Subject: CAPRA Comments on RCP Management and Environment

TO: Adrienne Coleman, Superintendent, NPS

CC: CAPRA BOARD

FR: JAC SMIT, Treasurer

DT: May 21st 2003

RE: Commentary on 2003 Rock Creek Park Draft 'General Management Plan':

Thank you superintendent and thank you fellow board members for this opportunity. In somewhat less concise form I have offered these comments as a speaker at the public meeting on this topic at 4200 Connecticut Av. NW W-DC Building 46 last evening.

CAPRA is a city and regional planning group concerned with the sustainable development of the Chesapeake Bay watershed. We consider Rock Creek Park to be a cornerstone of the urbanizing region.

It was apparent to me last evening that there were two significant gaps in distinguishing Rock Creek Park:

A. The majority of the citizen commentaries appreciated Beach Drive as a calm green tunnel 'shortcut' between Maryland and Virginia. These commentators did not express their other appreciations of the Park.

B. The alternative Plans, as exhibited on posters and in the 'Summary', present Rock Creek Park as a 'walled garden' or park, having hard edges.

My assessment from the lens of the region, but with the capacity gained from living within five minutes from Rock Creek Park, and commuting through it five days a week, and running and playing in it at least 100 times a year includes:

1. Improvements in access for the disabled and elderly are highly desirable,

2. A bicycle and hike 'route plan' is needed. This plan should at least include the area from Wisconsin to Georgia Avenues. This 'planning area' includes: Fort Reno, Fort DeBussy, Fort Stevens, Dunbarton Oaks Museum, the Washington Cathedral, The National Zoo, the Hillwood Estate and Museum, American University, The University of the District of Columbia, Walter Reed Medical Center and other significant places of special interest to two-wheel and pedestrian tourists and recreationists.

3. Consideration might well be given to a 'porous border [say within 100 feet] particularly to include the functions of fitness and community gardening. Families that live within more-or-less the perimeters of Georgia and Wisconsin, when engaged in fitness and gardening within the Park [as within major urban parks from San Francisco to Boston], will declare ownership in the sense of accountability for maintenance and security.

4. Neighbors of the Park presented pleas to keep Beach Drive open to all traffic during weekdays in order to enhance the safety of their children. The strongest case was that these neighborhoods were lacking in the basic residential community amenity of sidewalks. I urge the Park Service to plead with The District of Columbia and Montgomery County to provide at least one sidewalk on all residential streets that have any through traffic. These children, in strollers and buggies, on bicycles and tricycles and on foot deserve safe access to the Park, and to school and the library.

5. CAPRA, as one of the guardians of the Chesapeake Region's ecological sustainability, is solidly in support of those groups and individuals speaking for greater attention to the biological diversity of the aquatic, and terrestrial plant and animal life of the park and its tributaries.

6. CAPRA is concerned with the poor status of aquatic biodiversity within Rock Creek Park. And we are aware that this is largely due to inadequate and inappropriate water management upstream in the watershed. We are not content with the level of pollution contributed to the Potomac and the Chesapeake by Rock Creek. We urge NPS partnership with NCPPC and local government agencies.

7. We are concerned to be assured of the plan's assessment that Ozone levels will not be effected. As we fear that ozone may settle in the lower levels of the Park.

8. Considering Homeland Security, thought might be given to keeping Beach Drive open weekdays during periods of 'Orange and Red Alert'.

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9. The ten-foot fence east of Rock Creek from the tunnel at the Zoo to Klinge Road is inappropriate. This fence cuts off the neighbors [with riparian rights] from Rock Creek and adds nothing to the value of the Zoo. The fence may be moved to the west bank to the benefit of all but especially the Adams Morgan and Mt Pleasant neighbors.

CAPRA has not studied the General Plan and Environmental Impact Statement, only the summary. We are happy to do so at your request.

We would very much appreciate receiving five copies of the Capitol Forts Parkway Plan at the address below for discussion and comment, again at your request.

Sincerely,

Jac Smit  
Treasurer CAPRA

Subject: Rock Creek Park for our Children

Ref. Editorial of 7/13/03, ROCK CREEK PARK

Gentle Persons,

There will be four winners when Beach Drive is closed weekdays off-peak.

The park itself as it regenerates biodiversity,

The people who use Rock Creek Park for leisure pursuits,

The businesses on Georgia Av., Fourteenth St. and Connecticut Av., and

The Baltimore-Washington Metropolitan Region's environment for living.

The traffic issue is readily resolvable through ordinary means.

Enhance the capacity of Georgia Av., 14th St., Western Av. and Connecticut Av., [16th is under construction],

Build sidewalks on impacted residential streets and connector streets, including: Western Av., West Portal St.,

Build traffic calming devices: cul-de-sacs, one-ways, speed bumps.

Most of these improvements are gaps in original planning or of up-grades. They may be paid for by a joint venture: Montgomery County, Washington DC, the National Park Service and home owners. State and Federal funds may cover some of the costs.

Sincerely,  
Jac Smit

I am a city and regional planner, a board member of CAPRA [Chesapeake & Potomac Regional Alliance] and a very frequent driver on Beach Drive from Van Ness to Silver Spring daytimes.

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MR. SMIT: Good evening. I'm Jack Smit, S-M-I-T. I'm a resident. I'm representing the Chesapeake And Potomac Regional Alliance, CAPRA. CAPRA is an alliance of people concerned with city and regional planning covering the Chesapeake Bay and the Potomac watershed. Of course, we have interest in Rock Creek.

So the first thing I wanted to say is looking at the various plans there's a further need to improve access to Rock Creek Park for the elderly and the disabled. That should be given a high priority. My second comment - and I know some people here will disagree with it - is that every street in Silver Spring and Washington, D.C. should have a sidewalk.

It's completely inappropriate in the 21<sup>st</sup> Century that we have residential neighborhoods without sidewalks. It just doesn't make sense. I say that as someone concerned with city planning. My third point is that we need a bike route plan, not just more bikes on Beach Drive. We need more bicycle routes so that we have more access for bicyclists and hikers in Rock Creek.

If you are going to do a bicycle route plan, it has to be from Wisconsin to Georgia, not just a plan inside the park. So you have to work together with city and regional planners from outside the NPS as to where those routes are needed, for instance, from American University to UDC, connecting bicycle trails from Metro stations on the west side of the park to the east side of the park.

So it has to be worked from the outside in as well as just from the inside out. It's not an enclosed capsule. There's a couple of other points that I would like to make. There are only two community gardens in the park. We should be thinking more in terms of two digits. There's a lot of interest in community gardens. People look after a park when they have a community garden in the park.

We need more playground access for young kids so they can really enjoy the park when they are there with their parents which can be done. Then there's a problem which I haven't seen addressed which is that the zoological garden has put a fence on the east side of Rock Creek blocking access of the residents of Mount Pleasant and Adams Morgan to Rock Creek.

I don't believe that the zoological garden actually extends to the east bank of Rock Creek. I believe it's on the west bank. That fence should be removed. The fence should be fencing the parking lot and not preventing access of the adjacent residents to the park. So those are my comments. Everything I see, you are on a good track. But it doesn't look like a finished plan to me for the people of D.C. and adjacent Maryland. Thank you very much.

**NEAL R. GROSS**  
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WASHINGTON, D.C. 20005-3701



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Subject: Make Rock Creek Park More Friendly to Recreation

Dear Park Superintendent:

I am writing to urge you to support the National Park Service's proposal to allow more recreation in Rock Creek Park during weekdays. Rock Creek National Park is a beautiful natural area that should be managed as a precious natural resource. After all it is supposed to be a park, not a highway. One measly 2 lane road is not ever going to solve DC's traffic gridlocks. Closing Beach Dr. for a mere 6 hours a day would encourage people to take public transit, the only way to really cut down on gridlock. Please manage this park for the environment and recreation, not SUVs.

Thank you for taking these comments into consideration when making this decision.

Andre Smith  
Center for Environmental Citizenship  
National Office  
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April 2, 2003

Ms. Adrienne Coleman  
Rock Creek Park Superintendent  
National Park Service  
3545 Williamsburg Lane, NW  
Washington, D.C. 20008-1207

RE: Rock Creek Park and Rock Creek and Potomac Parkway DEIS

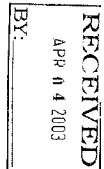
Dear Ms. Coleman:

Please accept this comment on the Rock Creek Park and Rock Creek and Potomac Parkway Draft Environmental Impact Statement (DEIS). Pursuant to our previous comments concerning the preparation of this DEIS and the preferred alternative, and after reviewing the DEIS, we are in full support of the National Park Service's preferred alternative for management, "Alternative D."

This alternative, which would involve weekday, six-hour closures of upper Beach Drive (among other actions), would seem to best satisfy and balance a number of competing objectives. According to both our own preliminary assessment (transmitted to you in earlier comments) and this DEIS, this alternative would continue to accommodate rush-hour traffic needs and not be disruptive of other transportation, given the relatively low level of automobile usage during the day. It would also more effectively promote and enhance quiet, safe daytime recreational usage of a beautiful part of the park, and very modestly reduce some daytime production of air pollution and water pollution in the park through reduced auto trips, tailpipe emissions, and related automobile pollutant sources (from crankcase oil and other fluids to shreds of tires and brake pads).

In our view, improved overall traffic Level of Service (LOS) is not, in particular, an objective that the National Park Service, through the management and stewardship of a unit of the national park system, should be putting ahead of other, park-specific objectives – such as management of historic, cultural, and environmental resources, and promotion of active but protective park usage.

Philip Merrill Environmental Center  
6 Herndon Avenue, Annapolis, Maryland 21403 • 410-268-8816, fax 410-268-6687



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In any case, it appears after your analysis that mid-day adverse LOS impacts due to adoption of Alternative D would be negligible, if noticeable at all. The other attributes of Alternative D are also worthy of taking forward to implementation, including, for example, rehabilitation of the Nature Center and other much-used facilities, badly needed trail improvements, and enhanced operations support.

While we might have liked to see more permanent closures, and while we hope that such opportunities might yet again be examined in future planning, we understand the need for balance at this time. It is in that light that we support Alternative D. Thank you for this opportunity to comment on the DEIS.

Yours sincerely,



Lee R. Epstein  
Director, Lands Program

MR. BROOKS: Good evening. My name is Ernie Brooks. And I am the current Chair of the Coalition for the Capital Crescent Trail. And I'm speaking on behalf of our Board tonight and in favor of alternative D.

I'm afraid I might lack the eloquence of some of the previous speakers, but I just have a couple of basic points to make.

The Coalition for the Capital Crescent Trail has been in existence now for 17 years, all the way from the conception of the trail through its acquisition, construction and continued enhancement. I think anyone who has used the trail would say it's a huge success. But we're also concerned with connections to other recreational venues, such as Rock Creek.

The National Park Service and Montgomery County have invested approximately \$25 million into Capital Crescent Trail and we believe the opportunity for weekday recreation would be greatly enhanced by linking the Capital Crescent Trail and a more recreationally friendly Rock Creek Park. There are many weekday users of the Capital Crescent Trail who would like to continue through Rock Creek Park on Beach Drive.

It's a natural tendency for people to oppose change. You see it all the time. When we began lobbying for the Capital Crescent Trail in 1986 the neighborhood along its route and almost every bureaucrat or politician in a decision making position opposed it. Once the trail was completed, every neighborhood loved us and thanked us and every politician wanted to take credit for it. I think this will be your experience if you do choose alternative D.

I also wanted to comment on a couple of things I heard mentioned tonight. One was that ten cars will be displaced for each cyclist. I don't know if that's correct or not, but even if it is, the difference would be that cars do have reasonable alternatives where cyclists perhaps do not.

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Also, I happen to live 2 doors off of 16<sup>th</sup> Street right in the middle of the length of the construction that's going on now. When that started a year ago, everyone in that neighborhood said that the neighborhood would be flooded by all these cars that were backed up on 16<sup>th</sup> Street because of the construction. Well, they were half right. The backups are there. They're backed up all the time. But I live right on the alley that's parallel to 16<sup>th</sup> Street, 2 doors off of 16<sup>th</sup> and I haven't seen a single car cutting through our alley to get out of this traffic jam. So, if the commuters and not just commuters, but even during off commute hours 16<sup>th</sup> Street is jammed now because of the construction, if they're not trying to cut through our neighborhoods, why do people think that the few cars going through Rock Creek Park on Beach Drive during the midday hours will go out of their way to drive up through these neighborhoods and continue on with whatever—wherever they're going. So I think that's widely overstated.

Just to finish, I understand that the Park Service is perhaps considering a 6 month or perhaps a year trial period for this alternative. And I say what's to lose? Let's go ahead and give it a shot for 6 months and if it works, then continue on with it.

Thank you.

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WASHINGTON, D.C. 20005-3701



drienne Coleman

Rock Creek Park  
3545 Williamsburg Lane NW  
Washington, DC 20008

Subject: Rock Creek Park Draft Management Plan

Dear Superintendent Coleman:

The Board of Directors of the Coalition for the Capital Crescent Trail (CCCT) would like to include our support for a six-month trial period for the weekday non-rush hour (9:30am to 3:30pm) recreation zones on Beach Drive. Our Board generally supports multi-use recreational trails in the metropolitan area, and particularly in this case as the weekday recreation zones will provide an excellent link between the Capital Crescent Trail and the paved trails in lower Rock Creek Park. We were very fortunate to have recently opened the old railroad trestle that carries the CCT over Rock Creek in Montgomery County, and the question we get asked most often is "What's that trail that runs under the trestle; how do I get on it; and where does it take me?" It would be fantastic if we could answer that question with the reply that it is the Rock Creek Path, and you can take it between the hours of 9:30am & 3:30pm all the way down to the National Mall (and the other end of the CCT) with almost no concern for vehicular conflicts! That's a recreational loop in excess of 20 miles, and all it will take is extending the weekend closures to 6 hours during the least busy time of the weekdays.

We are certain that you have heard a number of voices raised in opposition, and we remind you of two other occasions on which there was a great gnashing of teeth before things settled down, and the citizenry saw that there was nothing to be concerned about all along.

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The first was your own weekend closure of the recreation zones some 20+ years ago. While this preceded the formation of the CCCT by some half-dozen years, many of our Board members lived in the area, and were involved in that effort. We recalled how certain groups of residents whose neighborhoods abutted the Park cried out that this was going to be such a huge mistake, and that their quality of life would never be the same. This has obviously not come to pass, and on the plus side, weekend usage of Rock Creek Park has more than doubled since those closures were put in place. It seems that the weekend closures were much more of a dramatic change than the currently proposed weekday closures, so if the former did not disrupt the lives of those living around the Park, then the latter certainly won't. The second is something that our Board has had a much more intimate relationship with, and that is the hue and cry that went up from almost every neighborhood that the CCT was going to pass through. It was so bad that once when we received a new batch of checks from our bank, and they were mislabeled "Capital Crescent *Trial*" instead of "C C *Trail*", we almost decided to keep them as the Trail had become such a Trial! Now that the CCT is the most popular Trail in the metropolitan area (not to mention that anyone lucky enough to live close to it has seen tremendous increase in the value of their homes), no one seems to remember that anyone ever had a negative thing to say about it. The bottom line is that nearby residents often overreact to changes like these, and whether you are a politician, management group, or advocacy organization, you have to look beyond the clamor and envision the great asset that you have a chance to bring to the people. We feel that a six-month trial period will be sufficient to show that there is no cause for alarm in this instance, and while it's not likely that you will see such a dramatic increase in recreational usage as has occurred on the weekend, the increase will be measurable, and will likely continue to increase the longer the recreational zones remain in effect.

Sincerely,

Ernie Brooks

Chair, Coalition for the Capital Crescent Trail  
[www.cctrail.org](http://www.cctrail.org)

MS. LASCH: Superintend Coleman, thank you for your attentive listening this evening. We appreciate it.

I'm Maryann Lasch, L-A-S-C-H. Washington, D.C. I'm a member of the Committee of 100 subcommittee for Parks and Environment and also of the Potomac Chapter of ASOA.

This evening I will tell you some of the concerns of the subcommittee of the Committee of 100. We will be developing an official statement at a later date after more study. We will not be commenting on traffic tonight. We'll give you relief from that. There are four alternatives in the plan and you have heard from many, and I'm sure you'll hear from many more people tonight.

I want to speak about what is not in the plan. As a strategic planner and landscape architect I know that this plan is to give you a vision and a strategic direction for 15 to 20 years. It does not.

The plan is not creative, inspirational, innovative or energetic. It does not create excitement about the wonderful resource that Rock Creek is on a local, regional or national level. It does not really spark an interest that will draw congressional funding, many partnerships to it. At the same time, it does not stress the urgency of the threat, many of which we are familiar with.

We know you are stretched today with funding and staffing that you are not able to do the thing that you would like to do and the programs that you want to innovate. This is a great pity, and I don't think that the plan does a good job of talking about the condition today. We've all seen steady deterioration of the resource. Change is inevitable. We need to prepare for it. We need to talk about how we're going to seriously manage it. It's more than just complying with your national requirements of the National Park Service. It's time for us to really look at how we can get ahead of that.

I'd like to see something very innovative that looks at the best practices of today, the innovations of tomorrow and how we can really create a national showcase for the park, which is right here in the Nation's capital, which is a neighbor of the headquarters of almost every environmental group in the United States and our Congress and our lawmakers.

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The interpretation recommendations in the guide are very lacking. There is no analysis to back them up. I see 5 pages of information that describes the population surrounding the park and 5 pages about road kill. I don't see a serious analysis of the demographic transfer from today to 2020, nor we look at what the varied populations around the park will want and need in the future. We really would like to see the education and interpretation programs address that.

I think that partnerships is an issue that must be addressed. There is some initial work underway, but there's a much greater potential and a much greater opportunity to bring new energy, new people, new resources and new funding to the park to help you with your programs.

Finally, the third decision point that you have addressed talks about your administrative functions and operations. I think that these should showcase the very best practices that you know of in resource management, in sustainability, in the marriage of development with natural resource conservative. I don't see that in the plan and we'd really like to see more of that.

I'm hoping that these ideas of creativity and innovation will be developed in the final plan, and it will be an inspirational map for all of us.

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July 15, 2003

Adrienne Coleman, Superintendent  
National Park Service, Rock Creek Park  
3545 Williamsburg Lane NW  
Washington, DC 20008-1207

Dear Superintendent Coleman:

We are pleased to forward our comments on the Rock Creek General Management Plan. After preparation by our Parks and Environment Subcommittee, these comments were endorsed by both our Trustees and our membership.

We made every effort to reach out to other organizations and community representatives in reviewing the management plan, and in the course of our review sponsored a bus tour of the park. We appreciate the special effort your staff made in accompanying us on our bus tour of the park.

We trust that these recommendations will lead to a working relationship with the National Park Service that will prove beneficial to all.

Thank you for your attention to this matter. If you have any questions concerning our statement, please contact Loretta Neumann, chair of our Parks and Environment Subcommittee, 202-882-9274, email: [Lneumann@boo.net](mailto:Lneumann@boo.net).

Sincerely,

Ann Hughes Hargrove  
Chair

Enc: Committee of 100 Comments, Rock Creek General Management Plan

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## Comments on the Rock Creek General Management Plan Committee of 100 of the Federal City July 15, 2003

### Introduction

The Committee of 100 has supported the full realization of the Rock Creek Park mission since our founding in the early 1920's. During the 1990's, we participated and commented on the initial work by the National Park Service that led to the development of the draft General Management Plan (GMP).

We cite this background as evidence of the depth and seriousness of the Committee of 100's:

1. Commitment to the Rock Creek Park mission and to ensuring the health and success of this extraordinary national and local resource,
2. Interest in the proposed GMP and establishing a clear, strategic direction and priorities for management of this urban park, and
3. Desire for a strong working relationship with the National Park Service and the community in achieving these goals.

Before providing comments on the Alternatives and on specific findings and recommendations, we offer some general comments.

We are pleased that the Draft GMP has finally been completed and issued. It is fitting that the GMP recognizes Rock Creek Park's intrinsic value to the city, the region, and to the nation as an urban park, a place of great natural beauty, and as a travel corridor.

In spite of the Park Service's good intentions and years of preparation, we find the Draft GMP to be deficient in substantive ways that threaten its credibility:

- The GMP is unbalanced in its analysis and corresponding recommendations for management of an urban park and all its resources. Rock Creek Park has much more to offer than a scenic commute by car or bike. The plan gives short shrift to other users and the other management opportunities and challenges that will shape the future use and health of the park.
- Presented to serve as both a Management Plan and an Environment Impact Statement, the hybrid document ends up doing neither well.
- Relying on outdated studies and statistics, the recommendations lack currency and may have led to faulty projections and, consequently, inappropriate recommendations.
- The GMP excludes properties of the Rock Creek Park administrative unit (such as the Tennis Stadium, Carter Barron Amphitheater, Dumbarton Oaks and Montrose Park), that are directly adjacent to the park and should have been included in the GMP.
- And, especially critical, given limited federal funding resources, the plan does not provide sufficient guidance on how the National Park Service will set its priorities for protecting and managing the park in the future.

### Comments on the Rock Creek GMP - Committee of 100

### Findings and Recommendations

There are significant omissions and drawbacks in each of the four alternatives presented in the GMP. We will use Alternative A as the basis for our recommendations, not because we support it, but because we have concluded that it offers a better basis from which to start and to incorporate modifications. Our comments and recommendations generally follow the format of the plan.

#### 1. Traffic management

Traffic management is integral to preserving Rock Creek Park's intrinsic character, enhancing the park experience for all visitors, and protecting and managing the park's complete resources on an ongoing basis. Specific tools for managing traffic are needed, and current data is required to determine the best combination of actions. At a minimum we recommend that these problems and approaches be thoroughly studied or re-evaluated:

- a) **User Fee.** Test the feasibility of a fee-for-use charge (for motorized vehicles only) during the A.M. and P.M. peak commuting hours in those portions of Beach Drive and Rock Creek Parkway south of Military Road where traffic volumes exceed the Level-of-Service E threshold. There is already strong precedent for such actions--the NPS charges user fees at many of its parks. Moreover, the technology exists to collect such fees unobtrusively, e.g., the Dulles Tollway does so with transponders. The NPS could make appropriate exemptions available, such as for residents neighboring the park.
- b) **Transit access.** Explore ways to provide increased public transit access to and within the park in order to reduce traffic congestion and to offer greater access to visitors without cars (e.g., trolleys or mini-buses could travel to and through the park from nearby Metro stations and bus stops and through-park loops could be tied to interpretive programs.)
- c) **Pedestrian access.** Increase pedestrian access from nearby neighborhoods including Adams Morgan, Mount Pleasant and the upper parts of Wards 3 and 4. Improve existing access points, including maintenance, signage, and pedestrian crossings. To advance the McMillan Plan and the emerging Potomac Heritage National Scenic Trail system, Rock Creek must provide better non-motorized crossings through the park at both the Escarpment and the Fort Circle.
- d) **More study.** A number of recommendations in the GMP need further study before they can be recommended for implementation. These suggestions deserve further evaluation:
  - **Parkway closings.** Develop and test some of the park road closing strategies described in Alternative D to more fully measure their impacts on visitation, interpretation, natural and cultural resource management and wildlife habitat.
  - **HOV-2.** Study in greater depth the potential of HOV-2 strategies to reduce commuting volumes without impacting the scenic and historic character of the parkway.
  - **Traffic calming devices.** Investigate the use of traffic calming devices that Alternative A proposes in a manner that will preserve the historic nature of the park roadways. Test these devices in selected locations to identify the most appropriate and effective ones.
  - **East-west congestion.** Conduct a study of possible measures for mitigating east/west traffic congestion
- e) **Continuous bike trail.** Re-evaluate development of a continuous bike trail throughout the park or additional portions of the park, focusing on the separation of bicycle and automobile traffic during all hours that park roads are open.

#### 2. Profile of visitor demand and visitor experience

The GMP completely overlooks the impact of changing visitor demographics. Although the 2000 census shows significant changes in the region's population, this census information was excluded in drafting the GMP. A comprehensive visitor survey and analysis is essential to guide front-end NPS decisions about future visitor experiences and to re-connect the park to the life of nearby communities.

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## Comments on the Rock Creek GMP - Committee of 100

July 15, 2003

At a minimum, the study should address:

- a) **Existing conditions.** Identify existing uses and users;
- b) **Future projections.** Project future visitors trends, uses and user populations;
- c) **Impacts.** Determine visitor impact on resources;
- d) **Plan response.** Develop management strategies to support increased visitor uses and to mitigate visitor impacts;
- e) **Education programs.** Identify resource-driven education programs (e.g., recreation, science, nature, arts, music, landscape and industrial history, journalism, sustainable and healthy lifestyles) to improve the public's use and appreciation of the park;
- f) **Outreach.** Enhance outreach activities to schools, community centers, senior centers, etc in the region, to educate the community about park activities.

### 3. Protecting Intrinsic Park Resources

We believe that Rock Creek Park would be best served by a comprehensive approach to identifying and managing its intrinsic resources (scenic, historic/cultural, natural, archeological, recreational, and scientific). The GMP information on these resources is incomplete and hard to use. Additional studies are needed to complete the strategic direction of the GMP and responsibly move to taking action.

We strongly urge that the NPS fund and complete these high priority studies in the immediate future:

- **Water Quality and Storm Water Management.** A comprehensive water quality study and management plan, including a Storm Water Action Management Plan and the related environmental assessment of existing and planned conditions;
- **Cultural Resources.** Complete the inventory of cultural landscapes and a survey of archaeological resources.
- **Land Acquisition.** Identification of additional land acquisition needed to protect park quality and management;
- **Sustainability.** Detailed plan for sustainable management of all resources;
- **Research.** A series of pilot programs to test and develop detailed research on best scientific and management practices in concert with local universities, environmental management and research program of federal agencies and environmental organizations; and
- **Revised EIS.** After preparation of the final GMP, a revised Environmental Impact Statement should be developed for public comment and review by NCPC and other agencies.

### 4. Interpretation and Education: Park Facilities and Reuse of Historic Structures

We support the direction of Alternative A with the following comments and additional recommendations:

- a) **Endorsement.** We endorse these approaches in Alternative A:
  - Conversion of the Lodge House to visitor use and relocation of the Park Police substation to facilities outside but adjacent to the park;
  - Adaptive reuse of Klinge Mansion and relocation of park headquarters in leased offices outside but adjacent to the park;
  - Rehabilitation and expansion of the Nature Center and planetarium; and
  - Restoration of Peirce Mill.
- b) **More guidance.** The Plan does not provide adequate guidance on how Peirce Mill, Klinge Mansion and the Lodge House will be restored and used in the future.
  - While the GMP budgets \$1.73 million in capital costs for Peirce Mill, this is insufficient funding to restore full operation of the mill. When restored again to operation, the Mill can serve as an outstanding example of one of the earliest industrial processes. Peirce Mill is a key cultural resource in Rock Creek Park and a popular visitor site since its restoration in 1935. Although the Rock Creek Park staff developed an educational program for schools entitled *Milestones to Millstones*, the milling machinery has not been repaired since it failed in 1993.

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## Comments on the Rock Creek GMP - Committee of 100

July 15, 2003

- We strongly urge development of a plan, including funding, for the use of Klinge Mansion and the Lodge House before any action is taken to lease or change uses. This requirement should be included in the GMP.
  - The GMP should clearly state that any changes proposed to historical resources will require compliance with Section 106 of the National Historic Preservation Act. Other changes within the park may require additional environmental reviews and impact statements under the NEPA.
- c) **Interpretive program for lower park.** Edgewater Stables should be investigated for its potential suitability as a site for educational outreach and interpretive programming in the lower portion of Rock Creek Park.

### 5. Administration and Operations

We endorse the relocation of the administrative offices and police headquarters out of the historic structures to commercial space outside and near the park.

We offer the following additional recommendations:

- a) **No new construction.** We oppose the construction of new facilities within the park for administration and operations. We believe it is best to remove these activities and their impacts from the park.
- b) **Plan for re-use.** Prior to moving out of the current facilities, however, the plans and agreements for the restoration and reuse of Klinge Mansion and the Lodge House must be approved. (See 4b)
- c) **Staffing for the park.** Staffing levels, in number and grade level, need to be raised to properly recognize the significance of this park to the Nation's Capital. At a minimum, the National Park Service or federal Office of Personnel Management should elevate the grade requirement of the Superintendent to the level of Grade 15 or Senior Executive Service (SES).

### 6. Financial issues

Because the report depends on data that is several years old, and project information that is preliminary at best, we believe that the financial projections for both capital and operating expenses are insufficient to meet the needs of the park.

We recommend that the final GMP should include:

- a) **Sufficient resources.** Justification for funding at levels sufficient to provide sufficient staffing and other resources to fully support the planning and management of the park and its programs;
- b) **Deferred maintenance.** Disclosure of all deferred maintenance requirements (and annual funding for deferred maintenance) over the 20 years of the GMP planning horizon; and
- c) **FY2004 \$.** Update financial data in the report with fiscal year 2004 dollars (instead of 2001).

*At this point in our recommendations we introduce three crucial topics not included in the GMP:*

### 7. Prohibit cell towers

The towers that have been placed in the park were extremely controversial, and led to a court suit challenging their environmental impacts. The presence of these towers has already had a deleterious impact on the scenic qualities of the park, and no further towers should be permitted. This should be addressed in the final GMP and federal legislation--see 9 (f) below.

### 8. Partnerships

The GMP provides no guidance or direction for park management to use in developing partnerships with other governmental and non-governmental entities. To offset inadequate Federal resources, to encourage support for Rock Creek Park, and to increase involvement in its future, the Committee of

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Comments on the Rock Creek GMP - Committee of 100

July 15, 2003

100 urges the establishment of a wide range of public-private partnerships. Such partnership have produced excellent results for many communities and national parks throughout the nation, such as Golden Gate National Recreation Area in San Francisco; Gateway NRA in New York City; and Cuyahoga Valley National Park between Akron and Cleveland, Ohio.

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

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

**9. Federal legislation**

We believe that the Rock Creek Management Plan can be the impetus for creating a model program for urban park management in the Nation's Capital. To implement our recommendations, however, some federal legislation will be required

We strongly suggest that legislation be drafted to accomplish the following:

- a) **Sufficient funds.** Appropriate sufficient funds for park operations, maintenance, and construction to implement the Plan;
- b) **Conservancy.** Create a Rock Creek Conservancy to bring private sector advocacy and funding to enhance limited federal resources in the protection, promotion and enjoyment of all the park units administered as part of Rock Creek Park;
- c) **Citizens Advisory committee.** Create a National Capital Region Citizens Park Advisory Committee appointed to reflect the range of national and local interests, and with geographic and demographic representation, which can provide an ongoing mechanism to review and advise on the management of all the national park units within Washington DC;
- d) **User Fee.** If the studies prove this to be feasible, establish a user fee for travel through the most heavily trafficked portions of Rock Creek Park and Parkway during commuting hours and ensure that those funds are earmarked to support Rock Creek initiatives and programs to benefit the public;
- e) **Elevated grade levels.** Elevate the grade requirement of the Superintendent of Rock Creek to a minimum level of Grade 15 or Senior Executive Service (SES); and
- f) **Prohibit cell towers.** Prohibit any additional cell towers or similar intrusions in any location within the park.

**Conclusion**

We do not view this as the end of our recommendations, but the beginning of a working relationship with the National Park Service. The Committee of 100 offers a positive voice about what should happen. We will focus our efforts on bringing people together to move the process along and stay involved. These recommendations target studies and actions that will improve decision-making over the years and take the process to the next steps for implementation.

**CRESTWOOD NEIGHBORHOOD LEAGUE**

**4600 Blagden Terrace NW  
Washington, DC 20011  
(202) 291-3203**

May 23, 2003

**Ms. Adrienne Coleman, Superintendent  
Rock Creek Park, NPS  
3545 Williamsburg Lane NW  
Washington, DC 20008**

Dear Ms. Coleman:

**Please accept my appreciation for the opportunity to comment on the Rock Creek Park General Management Plan at the public hearing on May 22, 2003, at the University of the District of Columbia. My written comments are attached.**

**I am also providing you a copy of the resolution that the Crestwood Neighborhood League adopted at its public meeting on May 12, 2003. This resolution also supports Alternative B, which proposes no actions or changes to the current free access to Beach Drive at all times during the week.**

Sincerely,

  
**James H. Jones, President  
Crestwood Neighborhood League**

**Attachments**

By: \_\_\_\_\_



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**CRESTWOOD NEIGHBORHOOD LEAGUE**  
May 12, 2003

**RESOLUTION**

*Opposing any and all options in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic*

WHEREAS, The Environmental Impact Statement and General Management Plan evaluates the following four alternatives for Rock Creek Park: (1) **Alternative A** would generally retain the current scope of visitor uses with improvements in visitor safety, better control of traffic volumes and speeds through the Park; (2) **Alternative B** would propose no actions at all; (3) **Alternative C** proposes to close three sections of Beach Drive to automobiles at all times and, thereby, eliminate traffic in much of the northern part of the Park; (4) **Alternative D** proposes to close three segments of Beach Drive in the northern portion of the Park to motorized vehicles for a 6-hour period, from 9:30 a.m., to 3:30 p.m., on weekdays.

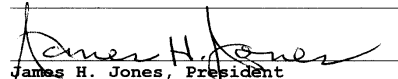
WHEREAS, **Alternative D**, which only completely opens Beach Drive during rush hours, has an unfair discriminatory effect in that on the one hand, it would allow access through the Park to commuter traffic during rush hour; however, on the other hand, it would prohibit access both through and across the Park to local residents during non-rush hour times. This alternative would have a further adverse effect on local residents both east and west of the park because residents would no longer be able to traverse the Park through local streets as is customary, but would be forced to go miles out of their way, even into Maryland in order to reach either side of the Park.

WHEREAS, **Alternatives C and D** prohibit access to Beach Drive from most roads and increase traffic on streets that are already heavily trafficked such as 16<sup>th</sup> Street NW, 14<sup>th</sup> Street NW, Military Road, Piney Branch Parkway and 13<sup>th</sup> Street, Park Road, and Blagden Avenue.

WHEREAS, The proposal, by prohibiting automobile access to the park, creates a public safety hazard in that it blocks access to emergency first responders and law enforcement agencies in addition to depriving residents of access to emergency evacuation routes at Rock Creek Parkway and George Washington Parkway.

WHEREAS, The proposal, by prohibiting automobile access to the park, benefits the young and mobile but penalizes many Seniors, the handicapped, small children and others with mobility challenges from using the park.

THEREFORE, BE IT RESOLVED, That Crestwood Neighborhood League opposes any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic; and supports **Alternative B** in the General Management Plan which proposes no actions or changes at all to the current free access to Beach Drive at all times during the week.

  
James H. Jones, President  
Crestwood Neighborhood League

**NATIONAL PARK SERVICE PUBLIC HEARING ON THE ROCK CREEK PARK GENERAL MANAGEMENT PLAN**  
May 22, 2002

**STATEMENT OF JAMES H. JONES,**

My name is James H. Jones. I am the President of the Crestwood Neighborhood League, a community that abuts and includes Rock Creek Park. I am also the Chairman of the Advisory Neighborhood Commission 4A. While both organizations adopted resolutions to oppose any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic, I am here tonight to represent the Crestwood Neighborhood League.

I feel that the General Management Plan as presented is a Simulation and does not fully disclose the objectives that the National Park Service is attempting to attain.

The name of the Simulation : Access Control

The purpose: To gain control over the roadways and throughways in Rock Creek Park

The Players: Those Favoring an Open system vs. Those Favoring the Bicycle System

**OPEN SYSTEM:** When Congress defined and dedicated Rock Creek Park in 1890, it established an Open System with roadways for the purpose of driving, bridle paths for horseback riding, and footways for pedestrians. Proponents of the Open System believe that the park exists for the benefit and enjoyment of all people: young, old, mobility challenged, cyclists and motorists alike; and that the value of the park's scenery depends on making it conveniently accessible to the people. Proponents of the Open System include Residents, community organizations, Advisory Neighborhood Commissions, commuters, enlightened government officials, and others.

**BICYCLE SYSTEM:** Proponents of the Bicycle System represent special interests and favor restricting the use of Park roadways to bikers which limits access to Rock Creek Park. The restrictions imposed by this group would benefit a few at the expense of the many. That is, the limitations would serve the needs of special interests, and wrongly exclude the majority of park users, including senior citizens, the young, and the physically challenged. The proposed restrictions also create public safety concerns, and unfairly burden the surrounding neighborhoods and communities with increased traffic. Proponents of the Bicycle System are the Peoples Alliance for Rock Creek Park (PARC), Washington Area Bicyclist Association, the National Parks and Conservation Association (NCPA) AND THE NATIONAL PARK SERVICE, itself as evidenced by its preferred choice of **Alternative D** in the General Management Plan. This Alternative proposes to close three segments of Beach Drive in the northern portion of the Park to motorized vehicles for a 6-hour period, from 9:30 a.m., to 3:30 p.m., on weekdays.

The game did not start today, it did not start even 7 years ago at the beginning of this General Management Plan. The struggle to control access to the roadways in Rock Creek Park began in the early 1960s with the resurgence in the popularity of bicycles as a mode of transportation. At that time the proponents of the Bicycle System began to lobby and influence the policies of the National Park Service.

Rock Creek Park management made its first special effort to accommodate the Bicycle System by reserving Ross Drive for bicycle use and prohibiting automobiles. In 1966, the section of Beach Drive from Joyce Road to Broad Branch Road was limited to bicycle and pedestrian traffic on Sunday mornings and later extended to Morrow Drive. By that fall, about 3 ½ miles of trail north of the Nature Center had been surfaced for bicycle use.

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However, it was found that the bicycle use on the closed roads did not justify their closure. The motorists complained, applied pressure on park officials. The roads were soon reopened to automobiles.

In the 1970s the Bicycle System prevailed even more upon NPS in their effort to gain control of Park roadways. They were successful in getting the NPS to set aside one lane of the Rock Creek and Potomac Parkway north of Virginia Avenue for a week to promote commuting by bicycle in lieu of automobiles.

This experiment resulted in massive traffic tie-ups with severe inconvenience to the great majority of parkway users who were unwilling or unable to shift to bicycles. The experiment failed. The lane closure was discontinued. However, NPS compromised with the Bicycle System by paving over the existing bridle trails between Connecticut and Virginia avenues for bicycle use and completing paved bicycle trails north along Beach Drive to Broad Branch Road and from Joyce Road north to near the Maryland line.

The NPS made its most significant concession to the Bicycle System in its *Statement for Management* prepared in 1977. In this document, the National Park Service listed as an objective: "To improve the quality of the visitor's experience by reducing excessive automobile commuter traffic on roads within Rock Creek Park, and encourage the shift of such traffic to mass transit, bicycle, and other forms of transportation."

In line with this objective, NPS in 1980 studied nine alternatives for completing the Bicycle System. Alternative 1: to build 5 ½ miles of new bicycle trail paralleling Beach drive and having no impact on auto traffic. Alternative 9: major section of Beach would be permanently converted to bicycles use only, eliminating Beach Drive as a through route for automobiles.

In March, 1981, PARC (Michael A. Replogle) advanced a tenth alternative: to permanently close Beach Drive to through traffic both above and below Joyce Road as soon as the Metro subway system was opened to the Van Ness station on Connecticut Avenue.

In March 1983, at the urging of PARC and other Bicycle System proponents, NPS advanced the following three-phase program:

Phase 1: Portions of Beach Drive above Joyce Road would be closed to cars on weekends and holidays during the warm months.

Phase 2: One lane of Beach Drive south to Broad Branch Road would be reserved for cyclists and joggers during weekday rush hours, allowing cars the other lane in the prevailing rush hour direction.

Phase 3: After 1985, when the Metro Red Line was to be completed beyond Van Ness and reconstruction work on 16<sup>th</sup> Street was to be finished, a gate would be placed near Boulder Bridge permanently barring that section of Beach Drive to automobiles.

- 3 -

This 1985 plan as expected was opposed by infuriated residents, automobile commuters and city officials who exerted their influence on Manus Fish, the then NPS director. This time, the compromise solution was the weekend closing on upper Beach Drive between Picnic Area 10 and Wise Road and between West Beach Drive and the Maryland line. A 2 1/2 mile bicycle trail paralleling that segment of Beach drive was proposed. However, the opposition to the new bicycle path and its costs remain even today as obstacles to its construction.

The General Management Plan that we are addressing today is a continuation of an effort by the Bicycle System to gain control of the Park's thoroughways for bicycle use. The Cyclists have made rapid gains and influence over the years.

However, I think it would be a serious mistake for the NPS to use the General Management Plan as the vehicle to disguise its selection of the Bicycle System over the Open System. I urge NPS officials not to make that mistake.

The alternatives in the plan that support the Bicycle System have tremendous disadvantages:

1. Alternative D which only completely opens Beach Drive during rush hours, has an unfair discriminatory effect in that on the one hand, it would allow access through the Park to commuter traffic during rush hour but would prohibit access through the park during non-rush hour times when local residents need access to the roadway.

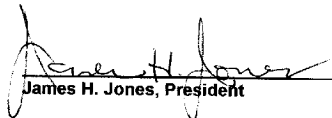
Further, by prohibiting automobile traffic, the alternative benefits the young and mobile but penalizes many Seniors, the handicapped, small children and others with mobility challenges who depend on the automobile from using the park.

*Alternatives C and D* prohibit access to Beach Drive from most roads and increase traffic on streets that are already heavily trafficked such as Blagden Avenue, 16<sup>th</sup> Street NW, 14<sup>th</sup> Street NW, Military Road, Piney Branch Parkway and 13<sup>th</sup> Street, Park Road, etc.

*These alternatives create safety hazards* in that access is blocked to emergency first responders and law enforcement agencies in addition to depriving residents of access to emergency evacuation routes.

Based on these factors, I oppose any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic. I support Alternative B in the General Management Plan which proposes no actions or changes at all to the current free access to Beach Drive at all times during the week.

In addition, I recommend that NPS implement the alternative proposed in the 1980 study of alternatives for completing the Bicycle System. That alternative proposed to build 5 ½ miles of new bicycle trail paralleling Beach drive and having no impact on auto traffic. However, if the north end of Beach Drive is not environmentally suited for the trails, then Oregon Avenue presents an option to consider.



James H. Jones, President

Comments on the Draft General Management Plan/Environmental Impact Statement, Rock Creek Park and Rock Creek and Potomac Parkway July 14, 2003

Submitted by Steven Donkin, Ph.D. - For the D.C. Statehood Green Party 1708 New Jersey Ave., NW Washington, D.C. 20001

Former environmental consultant and risk assessor; current D.C. public school science teacher

## INTRODUCTION

I and the D.C. Statehood Green Party appreciate the opportunity to comment on the National Park Service's Draft General Management Plan/Environmental Impact Statement, Rock Creek Park and Rock Creek and Potomac Parkway. I am a resident of the District of Columbia, and am submitting these comments on behalf of myself and the D.C. Statehood Green Party, which has a current registered membership of over 4,700 D.C. residents. This testimony has been approved by the general membership of the Party, and therefore should be construed as reflecting the official position of the Party

My own credentials include a Ph.D. in biology with an emphasis on environmental health from the Georgia Institute of Technology, and post-doctoral studies in environmental toxicology at the University of Georgia. I have taught college-level biology for two years, spent seven years as a consultant on environmental health and ecological risk assessment, and I currently teach high school biology, chemistry and environmental science in the D.C. public school system.

## D.C. STATEHOOD GREEN PARTY ENDORSEMENT OF PLAN C: NONMOTORIZED RECREATION EMPHASIS

I and the membership of the D.C. Statehood Green Party urge the National Park Service (NPS) to adopt Alternate Plan C: Nonmotorized Recreation Emphasis. We feel that this plan comes closest to fulfilling the congressional mandate to preserve Rock Creek Park as a "public park or pleasure ground for the benefit and enjoyment of the people of the United

States" as specified in the park's establishing legislation. In our opinion, the other three proposed plans do not address all the facets of park management in their proper balance.

Alternate Plan A: Improved Management of Established Park Uses (e.g., Motorized Recreation Emphasis), and Alternate Plan B: Continue Current Management/No Action, are clearly not in fulfillment of the Park Service's stewardship mandate and were properly discarded as options in the NPS draft document. However, we disagree with the Park Service's endorsement of Plan D: Mid-Weekday Recreation Enhancement, for the reasons stated below.

## CRITICISM OF NPS ENDORSEMENT OF ALTERNATE PLAN D

Mid-Weekday Recreation Enhancement The Park Service's endorsement of Alternate Plan D: Mid-Weekday Recreation Enhancement, proposed as a compromise by the D.C. Mayor's office, is a misguided attempt to provide a politically-driven solution which (as most decisions driven primarily by politics do) tries to please everyone at once while not addressing the core challenges. As an urban wilderness area which has evolved over the years into a major automobile commuter route, Rock Creek Park is being overrun by cars whose presence in the park has nothing to do with its original purpose as a recreation area and wilderness preserve. To most of these car drivers, Rock Creek Park is not a destination to be appreciated for itself but rather a place to get through on their way to somewhere else. Balancing the needs of motorized commuters with those of nonmotorized visitors along Beach Drive, as well as with the needs of resident wildlife which must negotiate through constantly changing traffic patterns, is simply not possible with a convoluted plan of alternating openings and closures of the road throughout the week. Only a complete closure of upper Beach Drive will remove the inevitable confusion to both humans and wildlife about when it would and when it would not be safe to traverse Beach Drive.

In addition, the draft document suffers from logical inconsistencies that are confusing to the reader. For instance, the Park Service states that Plan D would close several segments of Beach Drive to motorized traffic during the middle (non-rush hour) part of weekdays. These segments are currently closed to motorized traffic on the weekends. However, on page 29 of the

draft document, the Park Service states that an earlier suggestion from the public to "Allow motorized traffic on portions of Beach Drive only during weekday rush hours" was excluded from consideration for the following reasons:

"It would double the burden for barrier placement and removal on the U.S. Park Police"; "It would restrict the access throughout the park that visitors with limited mobility have during weekday evenings and would eliminate driving for pleasure except during rush hours"; and "Variable opening and closing times would be confusing and difficult to implement."

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

### OTHER CRITICISMS OF THE DRAFT DOCUMENT

In its discussion of the impacts of Plan C on traditional park character and visitor experience, the Park Service states that "Permanent closure of sections of Beach Drive would eliminate the traditional visitor experience of automobile touring along the length of the park" (page 232). "This would be a major adverse impact on the traditional visitor experience," says the Park Service.

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

Also, on page 142 of the draft document, it is stated that between 1991 and 1997, out of a total of 14,464,000 annual visitors to the park, 12,389,000 were "Nonrecreational (commuters)" and only 2,075,000 were "Recreational." I assume that most people would consider automobile touring to be a recreational rather than commuter activity. If that is the case, then how can closing Beach Drive and eliminating automobile touring be considered a "major impact on the traditional visitor experience" if 84%

of visitors are in fact nonrecreational commuters? According to the Park Service's numbers, the current traditional visitor experience appears to be commuting through the park to get to work, not automobile touring in order to enjoy the scenery.

As an environmental impact statement, the draft document provides an excellent and thorough description of some projected impacts of the various plans, particularly in the areas of watershed impacts, effects of traffic patterns, and impacts on historic/archeological sites. However, other sections are distressingly sparse and uninformative in their descriptions of impacts. Various traffic-calming measures that NPS "may" implement are repeatedly mentioned, for instance, but the reader is left with a sense that, due to unpredictable funding or other policy issues, none of these measures may in fact ever see the light of day. Any plans to address the constant problem of surface runoff and other non-point source pollution associated with allowing car traffic through the park are also only vaguely described. The document mentions the awareness by NPS that the endangered Hays spring amphipod resides in the park and thus requires special protections, but those protections are not detailed. Also, this amphipod was only recently discovered in Rock Creek Park in 1998. What measures are being taken by NPS to better inventory park wildlife and thus ensure the protection of other, perhaps as yet undiscovered, species within the park?

The Draft Management Plan/Environmental Impact Statement, while clearly reflecting a great amount of effort by the Park Service in its preparation, unfortunately suffers from a number of smaller inadequacies as well. Among the relatively minor shortcomings are the numerous typographical errors (perhaps reflecting budget or time constraints which disallowed proper copy editing) and the fact that the phone number provided in the document "For more information concerning this plan" (202-282-1063) was disconnected when I called it. The existence of these errors does not boost the reader's confidence that all the material within the document has been thoroughly reviewed.

### CONCLUSION

When I was young, the community swimming pool in our neighborhood had a sign: "We don't swim in your toilet; please don't pee in our pool."

The National Park Service should adopt a similar slogan for the parks it oversees. For instance, on behalf of the nonmotorized recreational visitors: "We don't recreate in the freeway, so please don't commute through our parks." Or on behalf of the animal inhabitants: "We don't reside in your roads, so please don't drive through our homes." A national park should simply not be used as a commuter thruway. This has never been the intended use of our parks, and it certainly was not the original intended use of Rock Creek Park as outlined in its establishing legislation.

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In addition to removing commuter automobile traffic from this sensitive area, the Park Service should expand the visitor experience by making the improvements specified in Plan C, as well as providing transit within the park to improve access. Other national parks are taking steps toward banning cars within park boundaries and replacing car access with shuttle services, including trolley and light rail. With these improvements, the Park Service's concern regarding the limiting of the "automobile touring" experience may be adequately addressed. Rather than giving the highest priority to privately owned, motorized traffic, with occasional concessions to nonmotorized visitors, the Park Service should be emphasizing nonmotorized use of the park first. After upper Beach Drive is permanently closed to automobiles, thereby restoring the park to its intended use, the Park Service may, if it chooses, make a few concessions to the automobile. One idea may be a one-day opening of Beach Drive to cars in the spring and fall so that motorists may enjoy the changing seasons.



## Elsie Whitlow Stokes Community Freedom Public Charter School

May 23, 2003

Superintendent, Rock Creek National Park  
3545 Williamsburg Lane  
Washington, DC 20008

Dear Superintendent,

I am writing in support of the proposal to close the roads in Rock Creek Park to car traffic during the weekday hours of 9:30 a.m. – 3:30 p.m. The closure of these roads during school hours would greatly benefit the students at our elementary school.

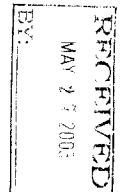
I am an avid bike rider and hiker and enjoy using the park during the evenings and weekends. I mostly enjoy sharing Rock Creek Park with my students at the Elsie Whitlow Stokes Community Freedom Public Charter School. Our location at 16<sup>th</sup> and Park Rd., NW is ideally suited to visiting the Park frequently. We currently go hiking on a weekly basis. We have the ability to do a bicycling and handycycling program and I foresee adding rollerblading as well, however we do not have a safe traffic-free space to do the program. Closing the roads during school hours would be ideal for our students to bike and blade safely and get the exercise they so desperately need.

The epidemic of childhood obesity is well documented. The aim of our school's PE program is excite children and their families to fitness and to develop a life-long love of the outdoors and recreation. Closing Rock Creek Park during school hours would help further our school's goals as well as the goal of the National Parks.

As a charter school we are proud of the educational opportunities we can offer to our students, but our space is severely limited. Closing Rock Creek Park would create a safe classroom for our students to learn bicycle safety and rollerblading. There are many other public and private schools in the local Northwest area and in the city at large that would utilize the Park during school hours. Let's give the Park back to the people and the children who will grow up remembering their days in the Park fondly and keep it protected for years to come.

Thank you,

Carol Minder  
PE teacher  
Elsie Whitlow Stokes Community Freedom Public Charter School



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Subject: Support Rock Creek proposal  
Dear Park Service:

I am strongly in support of the proposal to close off Beach Drive for six hours a day. Rock Creek Park is a National Park, never intended to be a local commuter way, and I believe it is high time that as much as possible of its natural beauty and wildlife habitat should be restored to at least a semblance of the peace and quiet that one would expect of a national park.

I have lived west of the Park for the past 30 years, and often commute through Beach Drive on my way to work downtown. But I would gladly give it all up for the knowledge that this beautiful part of the Park was at last car-free even for just a few more hours a day, knowing that it was at last being managed for wildlife and quieter forms of recreation, as it is on weekends.

I frankly find it difficult to believe the arguments that such a closure will somehow cause "gridlock" in adjoining neighborhoods. For Pete's sake-- this is a non-rush hour closure! I know from experience, since I live in one of those neighborhoods, that hardly anyone is around at all in them during the day, and certainly very little car traffic.

Please do the right thing by this great Park and stick to your original proposal.

Sincerely,

Brock Evans

Brock Evans, Executive Director  
Endangered Species Coalition  
1101 14th St, NW, Ste. 1001  
Washington, D.C. 20005

#### OFFICERS

*President*  
Francis M. Clarke, III  
3317 Cleveland Avenue, N.W.  
Washington, DC 20008

*First Vice President*  
Ann Leikow

*Second Vice President*  
Carroll Green

*Secretary*  
Jane A. McNew

*Treasurer*  
Allen E. Benelli

### *Federation of Citizens Associations of the District of Columbia*

ORGANIZED MARCH 5, 1910 • INCORPORATED JUNE 3, 1940

#### EXECUTIVE BOARD

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June 25, 2003

Mr. John G. Parsons  
Associate Regional Director  
National Park Service  
1100 Ohio Drive SW  
Washington, DC 20242

Ms. Adrienne A. Coleman, Superintendent  
Rock Creek Park  
National Park Service  
3545 Williamsburg Lane NW  
Washington, DC 20008-1207

RE: ROCK CREEK PARK DRAFT GENERAL MANAGEMENT PLAN/ENVIRONMENTAL  
IMPACT STATEMENT

Dear Mr. Parsons and Ms. Coleman:

At its meeting on June 24, 2003, the Federation of Citizens Associations of the District of Columbia ratified the vote of the Executive Board to support *Alternative B*, the *No Action Alternative*, as outlined in the draft General Management Plan of Rock Creek Park. Organized in 1910, the Federation of Citizens Associations serves as a coordinating body for citizens' interests, and is committed to bringing the voice of District taxpayers and residents to policy discussions. The Federation has a membership of 40 civic associations representing thousands of residents throughout the District of Columbia.

The Federation is impressed that member civic associations and Advisory Neighborhood Commissions on both sides of Rock Creek Park identify *Alternative B* as their preferred alternative in the draft General Management Plan. Further, the Federation's endorsement of *Alternative B* is in reaction to *Alternative C* and *Alternative D* which propose to close sections of Beach Drive to automobile traffic at all times and during non-rush hour, respectively. The Federation opposes all options that propose to close Beach Drive to automobile traffic for many reasons. Senior citizens and handicapped require weekday vehicular access to upper Beach Drive. Motorists want to continue using Beach Drive as a scenic and convenient route through Rock Creek Park. Further, Beach Drive handles up to 2,500 vehicles daily and residents on both sides of the Park do not want this traffic diverted into their neighborhoods. In addition, the draft Environmental Impact Statement, itself, states that a Beach Drive closure would have negligible effects on rush hour traffic volume, air and water quality, and on reductions in mortality for all park species.


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Parsons / Coleman  
25 June 03  
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Mayor Williams has indicated that the closure of Beach Drive will interfere with recently developed emergency evacuation plans. It is more than apparent from this data that there is no consensus to close Beach Drive. Therefore, the Federation urges the National Park Service to select *Alternative B, the no action alternative*.

Sincerely,



Francis M. Clarke, III  
President

cc: Congresswoman Eleanor Holmes Norton  
Mayor Anthony Williams  
City Council Chairperson Linda W. Cropp  
Councilmember Jack Evans  
Councilmember Harold Brazil  
Councilmember David A. Catania  
Councilmember Phil Mendelson  
Councilmember Carol Schwartz  
Councilmember Jim Graham  
Councilmember Kathleen Patterson  
Councilmember Adrian Fenty  
Councilmember Vincent Orange, Sr.  
Councilmember Sharon Ambrose  
Councilmember Kevin Chavous  
Councilmember Sandra Allen  
Michael F. Byrne



"Friends of Open  
Parkways"  
<friends@openparkway  
s.org>

07/09/2003 07:31 AM  
AST  
Please respond to  
"Friends of Open  
Parkways"

To: <Undisclosed-Recipient:>  
cc:  
Subject: Federation of Citizens Association Support Alternative

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Friends of Open Parkways

## PRESS RELEASE

July 9, 2003

### Federation of Citizens Association Support Alternative B

For more information, visit our website at [www.openparkways.org](http://www.openparkways.org)

The Federation of Citizens Associations of the District of Columbia support Alternative B, the No Action Alternative as outlined in the draft General Management Plan of Rock Creek Park. The Federation has a membership of 40 civic associations representing thousands of residents throughout the District of Columbia. A letter was sent on June 25, 2003, to Mr. John Parsons and Ms. Adrienne Coleman of the National Park Service. See letter below.

June 25, 2003

Mr. John G. Parsons  
Associate Regional Director  
National Park Service  
1100 Ohio Drive SW  
Washington, DC 20242

Ms. Adrienne A. Coleman, Superintendent  
Rock Creek Park  
National Park Service  
3545 Williamsburg Lane NW  
Washington, DC 20008-1207

RE: ROCK CREEK PARK DRAFT GENERAL MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Parsons and Ms. Coleman:

At its meeting on June 24, 2003, the Federation of Citizens Associations of the District of Columbia ratified the vote of the Executive Board to support *Alternative B, the No Action Alternative* as outlined in the draft General Management Plan of Rock Creek Park. Organized in 1910, the Federation of Citizens Associations serves as a coordinating body for citizens' interests, and is committed to bringing the voice of District taxpayers and residents to policy discussions. The Federation has a membership of 40 civic associations representing

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thousands of residents throughout the District of Columbia.

The Federation is impressed that member civic associations and Advisory Neighborhood Commissions on both sides of Rock Creek Park identify *Alternative B* as their preferred alternative in the draft General Management Plan. Further, the Federation's endorsement of *Alternative B* is in reaction to *Alternative C* and *Alternative D* which propose to close sections of Beach Drive to automobile traffic at all times and during non-rush hour, respectively. The Federation opposes all options that propose to close Beach Drive to automobile traffic for many reasons. Senior citizens and handicapped require weekday vehicular access to upper Beach Drive. Motorists want to continue using Beach Drive as a scenic and convenient route through Rock Creek Park. Further, Beach Drive handles up to 2,500 vehicles daily and residents on both sides of the Park do not want this traffic diverted into their neighborhoods. In addition, the draft Environmental Impact Statement, itself, states that a Beach Drive closure would have negligible effects on rush hour traffic volume, air and water quality, and on reductions in mortality for all park species. Mayor Williams has indicated that the closure of Beach Drive will interfere with recently developed emergency evacuation plans.

It is more than apparent from this data that there is no consensus to close Beach Drive. Therefore, the Federation urges the National Park Service to select *Alternative B*, the no action alternative.

Sincerely,

Francis M. Clarke, III  
President

**c c: Congresswoman Eleanor Holmes Norton  
Mayor Anthony Williams  
City Council Chairperson Linda W. Cropp  
Councilmember Jack Evans  
Councilmember Harold Brazil  
Councilmember David A. Catania  
Councilmember Phil Mendelson  
Councilmember Carol Schwartz  
Councilmember Jim Graham  
Councilmember Kathleen Patterson  
Councilmember Adrian Fenty  
Councilmember Vincent Orange, Sr.  
Councilmembber Sharon Ambrose  
Councilmember Kevin Chavous  
Councilmember Sandra Allen  
Michael F. Byrne**

MR. CLARK: My name is George Clark, where for the last 25 years I've lived one block from Rock Creek Park. I'm here to testify tonight as President of the Forest Hills Citizens Association. As David Bardin said, we're in Forest Hills right now. Forest Hills, the eastern border is Broadway and Rock Creek Park and all the way along that area, and that's something that I want to talk about a lot. We've heard, in fact, that—about the environmental effects, the Park Service has says there really isn't a difference in environmental effects among the options. I think there is. And I think alternative B is one that prevents adverse environmental effects for the reasons that I'll explain. And alternative B is what the citizens association supports.

We've heard a lot of talk and we see it in the report about well, we won't really have any traffic going into the local neighborhoods. Don't worry it's really going to be all right. But we don't see any analysis of that.

At the same time, we see that there will be 20 percent less traffic between Joyce Road, along Beach Drive down to Broad Branch Road. Well, where does that 20 percent of traffic going to go? It's going to go to 16<sup>th</sup> Street some, it's going to go to Broad Branch Road a lot. And what doesn't go to those places is going to go through Forest Hills. And when it goes through Forest Hills, it's going to go through two places. One it's going to come where Gates Road extended goes through and goes up Davenport Street, which you've ever ridden on that, is a twisty curving road with no visibility, one and a half lanes, no curves, no sidewalks, nothing. This is not a route that you want to send cars on.

The same thing is true on Brandywine Street which, in the winter you don't want to go up at all when it snows. There are severe effects.

Now, where does everybody go along Broad Branch Road? Broad Branch Road is interesting. Because it would become the principal alternative to the closed sections of Beach Drive. Tonight I think I've heard some people kind of assume that Broad Branch Road is part of Rock Creek Park. Well, we know it ain't. It's a city road. It's not part of the park. Although when you drive along it, it looks like it is, which is one of the wonderful things about it. That's one of the things we've worked on with the Park Service and the citizens association with tree and slope, the overlays, just for that reason.

Broad Branch Road is heavily traveled between Linean and Beach Drive. Broad Branch Road is surrounded by trees on both sides with no shoulders, many tight curves, narrow lanes and blind and semi-blind intersections, one of them comes out of the alley at the bottom of my house so I know what's that like.



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Although the management—the draft plan acknowledges that there will be increased traffic along Broad Branch Road, it makes no analysis of the consequences. Three years ago the city proposed rebuilding Broad Branch Road. And what did it say it wanted to do? It said it wanted to raise the road level 7 feet, it wanted to jersey barriers on both sides, it wanted to increase the speed limit and what was it going to do? It was going to take down at least 120 mature trees in order to do that. Now, fortunately, the local citizens an ANC-3F got that stopped. But that plan is coming back when we start to put more traffic down Broad Branch Road. And that's what I say that the Park Service should think about that, what will be the consequences be on those roads that will be taking the commuter traffic. Because there will be adverse effects and those adverse effects for Broad Branch Road will be felt right next to the park because we know that those little stakes that say where the park border is right along Broad Branch Road.

I also think that the recreational games promised in the management plane are speculative at best and let me say that based on 25 years of experience of walking, running, bicycling and driving along these roads, literally thousands of times. And right now I walk along the closed section of Beach Drive every Sunday. So my experience is current. And this is what I hear when I talk to people in Forest Hills. I think that the views are what I'm about to say here.

Certainly bicycling in this area is not a sport free of danger from those who are walking along or pushing their baby along Beach Drive. Indeed, my observation is that facing a pack of 100 or more riders racing at high speed around a blind hairpin turn while you are having a pleasant walk is a far more dangerous and frightening experience than seeing a single car moving at the speed limit. And I think we've all got to wonder whether there will be significant increases in recreational uses at 2:00 p.m. on cold January afternoons.

Likewise, school field trips will not be arriving at 9:30 in the morning or staying until 3:00 p.m.

The assumption is that if I want to drive from Bethesda to visit a sick friend over in Ward 4, then I'm a commuter and I should be banned. And I don't think that's right.

**NEAL R. GROSS**

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WASHINGTON, D.C. 20005-3701

Subject: Comments of Forest Hills Citizens Association re Rock Creek Park GMP

Dear Superintendent Coleman:

Attached are the comments of the Forest Hills Citizens Association in favor of Alternative B of the proposed General Management Plan for Rock Creek Park. As you know, Forest Hills forms the western border of the lower area of Beach Drive that is proposed for weekday closing under Alternative D. Forest Hills is also home to all or part of 3 more National Parks, including Soapstone Valley, Melvin Hazen Park and Fort Circle Park. Because of our proximity to these treasures, we are particularly concerned with their use and preservation.

George R. Clark  
President  
Forest Hills Citizens Association  
4401-A Connecticut Ave., N.W. #209  
Washington, D.C. 20008  
president@foresthillsdc.org

Statement of Forest Hills Citizens Association Concerning Rock Creek Park and the Rock Creek and Potomac Parkway Draft General Management Plan In Support of Alternative B

July 15, 2003

The Forest Hills Citizens Association ("FHCA") recommends that the Park Service adopt Alternative B (the status quo). FHCA sees the Preferred Alternative D as fundamentally flawed, for reasons detailed below. Moreover, we believe that a significant alternative has not been explored at all. This alternative received favorable comments during the hearings. That alternative is to complete a bike path on Beach Drive between Broad Branch Road and Military Road, as has been discussed in the past.

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Forest Hills borders Rock Creek Park along the entire Eastern side of the neighborhood, and borders Melvin Hazen Park as well. Forest Hills also includes Soapstone Valley Park, and parts of Fort Circle Park, so we are anxious to promote and protect our National Parks. And FHCA, which will be 75 years old next year, knows the value of Rock Creek and the other local national parks. It has worked successfully with the National Park Service ("NPS"). In 2002 it filed a petition with the DC Zoning Commission for a Tree & Slope Overlay, largely to help protect the Park, which borders so much of Forest Hills. Forest Hills includes UDC, where the public hearings were held on the Draft General Management Plan ("GMP").

First, we note that the NPS found "that all four alternatives would have fairly similar effects on air quality, the water quality and hydrology of Rock Creek and its tributaries, wetlands and floodplains, deciduous forests, and protected and rare species." The principal differences among the plans is traffic. Thus environmental concerns played no real role in the decisionmaking. But they should have, because only Alternative B prevents certain adverse environmental effects, as will be explained in full.

Second, the GMP states that "nearby street intersections would be operating well below their capacities during the mid-day period.... While the diverted the mid-day traffic would be perceptible on some city streets, it would not cause any changes in levels of service or in traffic-related community character." At the same time it says that there would be a 20% reduction in traffic along Beach Drive between Joyce Road and Broad Branch Road. That 20% of traffic has to go somewhere. The logical places for it to go are first, along Broad Branch Road, and second through Forest Hills to Connecticut Avenue. Both of these problems have received insufficient consideration under the GMP, which is based on a long-outdated traffic study (1990). The model to which that data is then applied "has [not] been developed and validated . . . [for] corridor studies such as the Rock Creek Park project."

The GMP says even less about where northbound traffic will go. All of the alternatives except Alternative B would cause increased traffic along Broad Branch Road. Broad Branch Road would be the principle alternative to the closed sections of Beach Drive, especially for northbound traffic, since this

would be the initial closure point. Although Broad Branch Road looks and meanders like a park road, it is a city street.

Broad Branch Road is already heavily traveled. Between Linnean Avenue and Beach Drive, Broad Branch Road is surrounded by trees on both sides with no shoulders, many tight curves, narrow lanes and blind or semi-blind intersections. One of the three streets leading out of the park from Broad Branch is narrow with many twists and curves and steep hills, no curbs – and is only 1.5 lanes wide (Davenport Street). A second contains a steep hill that can be dangerous in winter weather (Brandywine Street). The third crosses a one lane bridge and moves steeply uphill around sharp curves (27th Street).

The GMP acknowledges that there will be increased traffic along Broad Branch, but makes no analysis of the consequences of that traffic. Instead it concludes, without support, that there will be no adverse impact on the Forest Hills neighborhood (or any other neighborhood) or Rock Creek Park. But there will be adverse impacts far beyond increased traffic flow along residential streets.

Several years ago the city proposed rebuilding Broad Branch Road in its entirety by raising the street level 7', placing Jersey barriers along the side, raising the speed limit, and removing approximately 120 mature trees. The City's proposal was shelved after opposition from FHCA, local citizens and ANC3F. We can almost be certain that this project, which would negatively impact a 2 mile stretch of road immediately next to Rock Creek Park (the Park starts at the east edge of Broad Branch Road), will be revived to relieve newly caused congestion. Yet the GMP makes no mention of this problem in its evaluation. The failure to consider the impact of traffic on Broad Branch Road is a fatal defect in the GMP.

Traffic cutting through Forest Hills is not an imaginary issue. Those of us who have lived in Forest Hills within one block of Rock Creek Park for 25 years can speak from personal experience about the increased traffic flows from traffic cutting through to and from Connecticut Avenue. While the GMP concludes that there would be "no disproportionate routing of traffic to disadvantaged areas or ethnic neighborhoods," it says nothing about the

actual re-routing of traffic to the surrounding neighborhoods on either side of the park, none of which are disadvantaged or ethnic. Nor could it because no contemporaneous traffic study was done. The failure to analyze this issue is again a fatal defect in the GMP.

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Moreover, the recreational gains promised in the GMP are speculative at best. Again, let me speak from 25 years of experience of walking, running, bicycling and driving along these roads literally thousands of times. And I walk along this closed stretch of Beach Drive every Sunday, so my experience is very current. It echoes the experience of the many Forest Hills residents to whom I have spoken about this issue.

Proponents of Alternative D speak glowingly of increased use by young parents, tourists, etc. When thinking of babies in carriages, proponents of Alternative D have not fully considered two things. The first issue is the safety of persons on a remote stretch of road with few users (by definition) and poor cell phone service. While weekend users can be assured of seeing many other individuals, the GMP itself says encountering others would be an isolated event. Will parents be pushing baby carriages alone on dark November afternoons?

But the second issue is a more general safety concern. How will the Park Police deal with a wheelchair in the middle of the closed stretch at 3:15 p.m.? Will Beach Drive be left closed until the person clears? What will the rules be if you want to enter for a walk at 3:00 at Broad Branch and return to your car? When you reach Military Road at 3:30 will Beach Drive be kept closed until your return? Will Park Rangers be posted to ask "how long will you be here?"

The GMP is wrong in assuming that closing the gorge area to automobile traffic during non-rush hours will encourage commuting by bicycle. Because the closings are occurring during non-rush hours, they cannot – by definition -- encourage commuting to work by bicycle. Second, bicycling in this area is not a sport free of danger from those who are walking along or otherwise using Beach Drive. Facing a pack of 100 or more riders racing at a high speed (in excess of the posted speed limit) around a blind hairpin turn while you are having a pleasant walk is a far more dangerous and

frightening experience than seeing a single car moving at the speed limit. And we all must wonder whether there will be significant increases in recreational uses at 2 p.m. on cold January afternoons.

The GMP is also flawed in assuming that the morning rush hour ends at 9:30 a.m. Again those of us who live in Forest Hills base this on our first-hand observation and experience over many years.

At its heart, Rock Creek is an urban park to be used by the residents of the City. One of the first uses it was given was for recreational motoring. Although we have

no problem with the current road closing schedule, we can see no good reason why driving through the gorge at 12 noon should be prohibited 365 days a year. The GMP has not considered the impact of the planned closings on the surrounding neighborhoods, including the potentially disastrous consequences on the Park and on the environment of rebuilding Broad Branch Road because of the increased traffic that will be forced onto it. We urge that you adopt Alternative B.

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Friends of Open Parkways, friends@openparkways.org

Subject: Friends of Open Parkways Oppose any Further Closures

July 15, 2003

Dear Mr. Carlstrom and Ms. Coleman:

Attached is a letter stating our position on the Park Service's DRAFT Management Plan. Should you have trouble opening the attachment, please let us know.

Sincerely,

Leaders, Friends of Open Parkways

[www.openparkways.org](http://www.openparkways.org) (See attached file: CarlstromOpenparkwaysLetter.pdf)

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Friends of Open Parkways

As members of Friends of Open Parkways, we are writing you today to let you know the overwhelming support there is for keeping Beach Drive open to all. Listed below are the various organizations that oppose closing Beach Drive.

**Advisory Neighborhood Commissions:**

The Advisory Neighborhood Commissions consider a wide range of policies and programs affecting their neighborhoods, including traffic, parking, recreation, street improvements, liquor licenses, zoning, economic development, police protection, sanitation and trash collection, and the District's annual budget.

In each of these areas, the intent of the ANC legislation is to ensure input from an advisory board that is made up of the residents of the neighborhoods that are directly affected by government action. The ANCs are the body of government with the closest official ties to the people in a neighborhood.

The ANCs present their positions and recommendations on issues to various District government agencies, the Executive Branch, and the Council. They also present testimony to independent agencies, boards and commissions, usually under rules of procedure specific to those entities. **By law, the ANCs may also present their positions to Federal agencies.** The following Advisory Neighborhood Commissions (ANC) passed resolutions to support Alternative B.

The Advisory Neighborhood Commission Assembly (representing all 37 ANCs)  
ANC 1D (representing approximately 12,000 DC residents)  
ANC 3C (representing approximately 18,000 DC residents)  
ANC 3F (representing approximately 14,000 DC residents)

ANC 3/4 G (representing approximately 14,000 DC residents)  
ANC 4A (representing approximately 16,000 DC residents)  
ANC 4C (representing approximately 20,000 DC residents)

The map below, in orange, depicts ANC boundaries which surround Rock Creek Park and who oppose any more closures.

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### **Neighborhood Civic and Community Organizations:**

The following neighborhood organizations also support Alternative B:

**The Rollingwood Citizens Association**, Chevy Chase, MD (representing 2,300 residents bounded by Beach Drive, East-West Highway, Brookeville Road and Western Avenue.)

**Rock Creek Forest Homeowners Association**, Chevy Chase, MD (representing 400 residents, bordered by Beach Drive to the West, EW Highway to the North and Grubb Road to the East.

**Donneybrook Homeowners Association**, Chevy Chase, MD (representing 400 residents) bordered by Beach Drive to the West, EW Highway to the south and Grubb Road to the east.

**The Mount Pleasant Neighborhood Alliance**, DC (representing 500 residents bounded by Beach Drive, Piney Branch Parkway, 16th Street, Adams Mill Road and Klingle Road.)

**The Crestwood Neighborhood League**, DC (representing 105 residents bounded by Rock Creek Park to the West and 16th

Street to the east; south to Piney Branch Parkway and north to Kennedy Street.

**The Shepherd Park Citizens Association**, DC (representing over 200 residents in Ward 4)

**The Gateway Coalition**, DC (representing many local associations in Ward 4)

**The Federation of Citizens Associations of the District of Columbia** support Alternative B. **The Federation has a membership of 40 civic associations** representing thousands of residents throughout the District of Columbia. They are:

1. American University Park Citizens Associations
2. Association of Oldest Inhabitants of the District of Columbia
3. Burlieth Citizens Association
4. Capitol Hill Restoration Society
5. Cardoza-Shaw Restoration Society
6. Chevy Chase Citizens Association
7. Citizens Association of Georgetown

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8. Cleveland Park Citizens Association
9. Cloister in Georgetown Homeowners Association
10. Columbia Heights Citizens Association
11. Columbia Plaza Tenants Association
12. Concerned Neighbors Civic Association
13. Crestwood Neighborhood League
14. Dupont Circle Citizens Association
15. Foggy Bottom Association
16. Forest Hills Citizens Association
17. Fort Gains Citizens Association
18. Fort Lincoln Citizens Association
19. Foxhall Citizens Association
20. Georgetown Residents Alliance
21. Glover Park Citizens Association
22. Hillandale Homeowners Association
23. Hillcrest Community Civic Association
24. Kalorama Citizens Association
25. Manor Park Citizens Association
26. Marshall Heights Civic Association
27. Michigan Park citizens Association
28. Mt. Vernon Square Civic Association
29. Neighbors for a Livable Community
30. North Michigan Park Civic Association
31. Palisades Citizens Association
32. Penn Branch Citizens Association
33. Residential Action Alliance
34. Shepherd Park Citizens Association
35. Sixteenth Street Heights Citizens Association
36. Southwest Neighborhood Alliance
37. Spring Valley Court Citizens Association
38. Spring Valley-Wesley Heights Citizens Association
39. West End Citizens Association
40. Woodley Park Citizens Association

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### **District of Columbia and Maryland Council:**

The Council of the District of Columbia is the legislative branch of the District government. All legislative powers are vested in the Council. In addition, the council approves the District's annual budget and financial plan, and sets the revenue required to fund the budget. It oversees the programs and operations of government agencies, and acts on or initiates reorganization plans for the Executive Branch. The Council determines land use, through the adoption of the comprehensive plan, and undertakes redistricting based on the decennial census. The Council develops legislative initiatives and budget priorities to promote the public welfare. It oversees the performance of government agencies and the implementation of management reforms to improve service delivery. As the local elected representative body, the Council seeks citizen participation throughout the legislative process. It holds

public hearings to provide an opportunity for public comment on proposed legislation, policy initiatives and government operations. Also, the Council helps citizens access government information and services.

The DC Council, voted overwhelmingly 11-2, on a resolution that may be cited as the "Sense of the Council on the National Park Service's Draft General Management Plan for Rock Creek Park Emergency Resolution of 2003".

**The Montgomery County Council** supports the current traffic management plan on Beach Drive in Rock Creek Park and requests that the National Park Service not change it. The Council supports and agrees with the Resolution from the Council of the District of Columbia and the letter from Congressman Van Hollen.

### **Other Political Supporters:**

**Congresswoman Eleanor Holmes Norton**  
**Congressman Van Hollen**  
**County Executive Douglas Duncan**  
**Mayor and Council of Kensington, MD**

### **Conclusion:**

Any new vehicular restrictions on Rock Creek Park's roadways would divert substantial traffic to other existing major north-south routes in the city, such as 16th Street, 14th Street, Connecticut Avenue, Massachusetts Avenue, and Wisconsin Avenue. Such restrictions would add even more congestion to already severely

overburden major thoroughfares and our adjacent residential streets. The District and its citizens already suffer from the adverse

transportation, economic, and environmental impacts of other federally-imposed vehicular traffic restrictions. We don't need to add another.

If there is an identified need for more paved biking trails, then the answer is not to exclude the majority of current users from our historic parkways. Instead, we need to look at enhancing existing trails or making new ones. The Park Service's own recommendations suggest that separate bikeways are the safest alternative. We may be able to enhance some of the underutilized trails; or create new paved trails away from the roadway.

We strongly oppose NPS's preferred plan which would exclude automobiles from recreational day time use of Beach Drive. We also strongly oppose any proposed "testing" of any closure alternative. Beach Drive and the other parkways in Rock Creek Park were created to provide broad public access to its beauty and should not be converted to commuters-only roads, or worse, closed to traffic altogether. Further restricting Beach Drive is another step toward completely eliminating the traditional and historic experience of touring Rock Creek Park, and also would rob the public of cultural resources that so many DC residents and visitors have enjoyed and cherished for nearly 100 years.

Rock Creek Park is a national park dedicated by Congress in 1890 for all people and was designed by Frederick Law Olmsted Jr. with scenic parkways for driving, and other amenities for picnicking, hiking and horseback riding throughout its vast distances. As such, the park was designed as an inclusive facility accessible to all. The bicycle path was created in the late '70s, and is enjoyed by many walkers, strollers, bicyclists and skaters. While it may make sense to accommodate these additional recreation uses, it is not fair to do so at the expense of the vast majority of users and contrary to the original intent and dedication of the park.

Instead of closing down our public roadways, maybe you should consider reserving the bridle paths for bicycle use from 9:30 am to 3:30 pm.

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Further, the NPS preferred alternative does not have the support of the community at large. On the contrary a community groundswell opposes blocking Beach Drive. This broadly-based grassroots uprising against the National Park Service plan is based in many sound principles including sensible transportation policy, fairness, enhanced public safety, and respect for culture and history.

The NPS plan to close Beach Drive does a disservice to the public in favor of special interest politics. It is one thing to oppose new roadway construction through established neighborhoods and green space. It is quite another for fringe special interest groups to take away our public roads for the benefit of a few. These efforts cross the line from appropriate influence of public policy to self-serving pilferage of public property. As we have seen with Klinge Road, if control of Beach Drive is given over to marginal special interests, it may be lost forever.

To paraphrase Chris Brown, Chief, National Park Service, River, Trails, and Conservation Assistance Program, 'Parkways are many things to many people. And that's one of their virtues.

Sincerely, Laurie Collins, Ann Ford, Anthony R. Scialli, Tom Broadwater, Robert Blaunstein, Nina Scherago, George Jones, Phyllis Blaunstein, James H. Jonz, Area Leaders, Friends of Open Parkways

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Page 1 of 1

Subject: Peirce Mill in the GMP

On behalf of the Friends of Peirce Mill, I wish to comment on the General Management Plan as it relates to the current restoration project at the mill. The various alternative plans presented in the GMP are virtually identical in their references to Peirce Mill. However, the report fails to mention that the objective of the project is to restore the mill to operation. For example, on page 99 it says: "The mill would be managed consistent with the recommendations of a historic structure report, currently nearing completion. The mill would provide demonstrations of the historic milling industry in the valley." And again in Table 6 on page 108 the reference to the mill states "Rehabilitate the mill to focus on history of milling and land use in the Rock Creek area".

While it is true that the HSR presents a plan which would indeed restore the mill to operation, we would like to see a specific statement that the ultimate objective is an operating mill. Such a statement would reassure our members and our donors that the Park is committed to an operating rather than a static demonstration of milling -- a "living museum of milling".

Respectfully submitted,  
Richard D. Abbott  
President, Friends of Peirce Mill

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Page 1 of 1

**Hearing on Rock Creek Park General Management Plan's  
Alternative D  
National Park Service  
May 22, 2003**

**Presented by:  
Chris Weiss, Director, D.C. Environmental Network  
Friends of the Earth**

Thank you Superintendent Coleman and all National Park Service employees and others who participated in putting together the "Draft" General Management Plan and for making sure the public has a chance to let you know how we feel about it.

My name is Chris Weiss. I serve as Director of the D.C. Environmental Network at Friends of the Earth. Friends of the Earth is a national environmental organization with over 1800 members in the Metropolitan Washington region. The D.C. Environmental Network, spearheaded by Friends of the Earth, consists of over 150 environmental, health and civic associations who believe the economic and environmental well being of District residents is tied to successful stewardship of our fragile urban environment...including our much prized national parks. Friends of the Earth is also a proud and active member of the People's Alliance for Rock Creek (PARC).

Friends of the Earth strongly supports PARC's position in favor of Alternative D, the mid-weekday recreation enhancement option. We believe Alternative D meets the needs of the greatest number of residents in the Washington metropolitan region. Of all the alternatives, this compromise, most fairly protects the interests of the surrounding neighborhoods, including the many pedestrians, seniors, bicyclists and motorists who presently use Rock Creek Park.

The beauty of this proposal is that on top of protecting existing uses, it enhances and opens up this sometimes under appreciated resource to potentially thousands of new users including tourists, school groups, families with small children and others.

It is also important to note that Wise Road, Bingham Drive, Military Road, Morrow Drive, Oregon Avenue, Glover Road, Ross Drive, Broadbranch Road, Blagden Avenue, Park Road, Porter Street and Rock Creek and Potomac Parkway would be open to motor vehicles at all times during this limited, six hour, non rush-hour, Beach Drive closure.

Subject: Help Rock Creek Park

National Park Superintendent Adrienne Coleman  
Rock Creek Park  
3545 Williamsburg Lane NW  
Washington, DC 20008

Dear National Park Superintendent Adrienne Coleman Adrienne Coleman,

I am writing to SUPPORT the National Park Service's preferred option to establish weekday recreation zones on Beach Drive in Rock Creek Park. Rock Creek Park is one of the great treasures of the Washington area, but as currently managed, the heart of the Park is available only to motorists five days a week. I commend the Park Service for seeking a balanced approach that will allow pedestrians, cyclists, roller bladers, and people of all ages and physical abilities to experience the Park seven days a week.

Sincerely,

Chris Weiss  
Friends of the Earth  
3203 38th Street NW  
Washington, District of Columbia 20016



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MR. WEISS. It's Chris Weiss. The Weiss is W-E-I-S-S, and I live in D.C.

And I'm here actually representing Friends of the Earth.

Thank you Superintendent Coleman and all National Park Service employees and others who participated in putting together the draft general management plan, and for making sure the public has a chance to let you know how we feel about it. My name is Chris Weiss, I serve as Director of the D.C. Environmental Network at Friends of the Earth.

Friends of the Earth is a national environmental organization with over 1800 members in the Metropolitan Washington region. The D.C. Environmental Network spearheaded by Friends of the Earth consists of over 150 environmental health and civic organizations who believe the economic and environmental well being of District residents is tied to successful stewardship of our fragile urban environment, including our much prized national parks.

Friends of the Earth is also a proud and active member of the People Alliance for Rock Creek. Friends of the Earth strongly supports Park Service's position in favor of alternative D, the mid weekday recreation enhancement option. We believe alternative D meets the needs of the greatest number of residents in the Washington Metropolitan region. Of all the alternatives, this compromise most fairly protects the interests of the surrounding neighborhoods including the many pedestrian, seniors, bicyclists and motorists who presently use Rock Creek Park. The beauty of this proposal is that on top of protecting existing uses, it enhances and opens up this sometimes unappreciated resource to potentially thousands of new users, including tourists, school groups, families with small children and others.

It is also important to note that Wise Road, Badgen Drive, Military Road, Marrow Drive, Oregon Avenue, Grover Road, Ross Drive, Broad Branch Road, Badgen Avenue, Park Road, Porter Street and Rock Creek and Potomac Parkway would be opened to motor vehicles at all times during this limited 6 hour non rush hour Beach Drive closure.

Implementing alternative D would help Rock Creek Park much like New York, San Francisco and Portland have done for years to attract more tourism by carefully balancing the interests of motorists and recreation. Only alternative D establishes this important balance.

Of course, cutting back on the use of Beach Drive even for a limited amount of time can positively impact the park's fragile environment. Reduction of pollutant in Rock Creek, reduced wildlife road kills and increases of non-motorized recreation and transit even in small quantities are beneficial.

What we should not underestimate is the opportunity alternative D gives our communities to educate a greater number of park users to the economic and environmental importance of maintaining parks, even in a challenging urban setting like the District. Giving more people access to Rock Creek Park and increasing park user's appreciation of this special resource means we just might have a fighting chance to finally clean up our polluted rivers and creeks, clean up the dirty air we breath and protect the environmental health and quality of life for all the region's millions of residents.

Your implementation of alternative D could well contribute to tackling these pressing environmental challenges. Thank you.

**NEAL R. GROSS**

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WASHINGTON, D.C. 20005-3701

ROCR 2854  
Page 1 of 1ROCR 2850  
Page 1 of 2***The Gateway Coalition***

*Of Business and Civic Associations in Maryland and D.C.  
Dedicated to the Revitalization of South Silver Spring  
And Upper Georgia Avenue in the District of Columbia*

Co-Chair for Maryland  
Daniel Meijer  
929 Gist Avenue  
Silver Spring Md. 20910  
(301) 585-1458

fax #: (301) 585-9110

Co-Chair for District of Columbia  
Gracie Baten  
7624 13<sup>th</sup> St. N.W.  
Washington D.C. 20012  
(202) 882-6162

June 1, 2003

Superintendent, Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008

RE: Rock Creek Park General Management Plan

Dear Sir or Madam:

The Gateway Coalition would like to go on record as supporting "Alternate B".

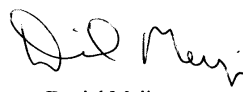
The Gateway Coalition consists of both business and civic associations in D.C. and Maryland, dedicated to the revitalization of upper Georgia Avenue in the District of Columbia as well as South Silver Spring.

At our last general meeting, many of our members in attendance expressed considerable concern regarding the proposed closure of Beach Drive and its impacts to the surrounding community. Our DC members in particular, felt that Beach Drive should be open to all and not discriminate against those who lack the physically ability to access the Park by non-motorized means. Others felt the proposed closure would exacerbate local neighborhood traffic congestion as well as restrict access to facilities (such as medical facilities) across or via the Park.

Thank you for considering the concerns of our members in selecting "Alternate B".

Sincerely,

  
Gracie Baten  
DC Co-Chair  
Gateway Coalition

  
Daniel Meijer  
MD Co-Chair  
Gateway Coalition

National Park Service, Rock Creek Park  
Public Meeting on the  
Draft General Management Plan Environmental Impact Statement  
Auditorium, University of the District of Columbia  
May 22, 2003, 5:30 – 9:30 p.m.

Statement of Jonathan L. Gifford  
Associate Professor and Director  
Master's of Transportation Policy, Operations & Logistics  
School of Public Policy, George Mason University  
3401 N. Fairfax Drive, MS 3B1  
Arlington, Virginia 22201

My name is Jonathan Gifford. I direct the Master's in Transportation Policy, Operations and Logistics at George Mason University in Arlington, Virginia. I have a Ph.D. in transportation engineering from the University of California, and more than 20 years of research and teaching experience in transportation policy and planning.

I am an avid bicyclist, an avid motorist, and a frequent user of Rock Creek Park and Parkway, as well as the other wonderful parks and parkways in our region. As a taxpayer and one of the 12 million annual commuters who use the Park, I believe that my use and appreciation of its beauty and scenery are every bit as valid and significant as those who choose to visit the park by foot or bicycle. I believe it is the responsibility of the Park Service to manage the Park in such a way as to accommodate the use of all, and not to subordinate the interests of a vast majority to those of a small minority of users.

Furthermore, I emphatically believe that parkway commuting has an uplifting impact on the parkway user, and provides a welcome scenic alternative to many of the other highways in our region.

I have carefully reviewed the Draft Plan and have three concerns.

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

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

Second, I believe the recommended Alternative D, Mid-Weekday Recreation Enhancement, fails to address the most pressing traffic and bicycle safety hazards in the Park, and benefits a very small number of recreational bicyclists. Mid-weekday closures of Beach Drive will do nothing to provide safe bicycle commuting in the upper valley of the Park during rush hour. As motorized and bicycle rush hour traffic continue to increase, the likelihood of crashes, injuries and fatalities is very likely to increase as well.

Mid-weekday bicycle usage of Beach Drive under Alternative D is expected to be very low, 20-35 users per hour (p. 34). I estimate that the number of displaced motorists during these hours of closure to be approximately 2,400, a ratio of more than 10 displaced auto users for each bicyclist.<sup>1</sup>

I concur with ruling out Alternative C, Nonmotorized Recreational Emphasis, due to its impacts on the regional transportation system. That being the case, I recommend that the Park Service reopen the issue of a continuous trail in the upper valley separate from Beach Drive as the best way to accommodate the full range of Park users safely and efficiently. If cost is an issue, the Park Service should consult with the Federal Highway Administration on possible funding of such an expansion.

Finally, the Park Service appears not to have updated its traffic survey for 13 years, since 1990. Given the significance of the potential impacts on motorized park users of some alternatives, it seems highly inadequate to base a management plan on such outdated information.

Thank you.

<sup>1</sup> 1990 usage of Beach Drive between Park Road and Porter Street was 8,900/day, with 800 during the morning peak hour and 900 during the evening peak hour. Assuming morning and evening peaks of 2.5 hours, and zero traffic from 11 p.m. to 6 a.m. yields approximately 400 vehicles/hour during off peak periods.



GREATER WASHINGTON  
Board of Trade

Growing Business. Building Community.

May 19, 2003

Ms. Adrienne Coleman  
Superintendent  
Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, DC 20008

Dear Superintendent Coleman:

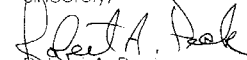
On behalf of the Greater Washington Board of Trade, I respectfully request that the status quo be maintained on use of the roads in Rock Creek Park. The park roadway system is of vital importance to commuters, non-commuters and park visitors. It should be maintained as is.

Closing any section of the park to auto use will cause for spillover and additional cut-through traffic to adjacent neighborhood roads and will result in increased traffic congestion to the District of Columbia and adjacent feeder streets from Maryland. This increase in traffic congestion would waste fuel, produce more air pollution, and increase the time already wasted on commuting trips due to congestion. For the non-commuting public and tourists, access would be reduced and the park experience would be unavailable.

The Board of Trade is the largest regional network of business and non-profit leaders and the only group representing all industry sectors. The Board of Trade's 1,350 member companies employ 40 percent of Greater Washington's private-sector workforce. Organizations join the Board of Trade to grow their business and help build a better community.

Thank you for the opportunity to comment on this important decision that will impact our city and region.

Sincerely,

  
Robert A. Peck  
President

1725 I Street, NW, Suite 200 Washington, DC 20006 T 202.857.5900 F 202.223.2648 www.bot.org

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MR. CUSHMAN: I don't think Bob is going to speak because I—I'm going to say what we want to say.  
I am Lieutenant General John Cushman, United States Army retired. And I've been asked to represent the 280 people who live at Knollwood Army Retirement Residence.  
Now, the average age of these residents is 85. Some 22 of them are here tonight, and after I speak I think we're all going to get on our bus and go back to our residence. But we want to get across one point. Most of these residents have their hospital and their clinical medical care provided by Walter Reed Army Medical Center. Between 16<sup>th</sup> and Georgia Avenue, just across the park. A bus takes these residents to Walter Reed Hospital and back 6 or times every weekday.  
Our interest is in Badgen Drive, Cheryl Drive and the connecting Beach Drive line. To close this section on weekdays would require all of these trips to use Oregon Avenue, Military Road and 16th Street—  
SUPERINTENDENT COLEMAN: Those roads won't be closed, sir.  
MR. CUSHMAN: Say again.  
SUPERINTENDENT COLEMAN: Those roads would not be closed under any of the alternatives.  
MR. CUSHMAN: I just found that out. We just want to be sure that you're not going to close—you're going to keep them open.  
I'll just say one more thing. Emergency ambulances use that same route. And six or eight times a week ambulances go that route during daylight hours. That's my message.  
This helps shorten your program, I think.  
Thank you much.

MR. ARONICA: My name is Lou Aronica. I live in D.C.. I am the Conservation Chair for the Maryland Native Plant Society. I speak on behalf of the society and the members who live in the District of Columbia.  
It seems to me that the three greatest threats to the forest community, to the naturally functioning system are excess water that courses through the park, the invasives that are overwhelming the park and over use of automobiles in the park. Of the three, the only one that is readily and simply addressable is the last, although it is the most politically contentious.  
On the question if invasives, I commend the staff and the Park Service for attempting to control the invasives and to lay out a plan. It's a very, very long term problem. And I would like in the management plan a commitment to persist on this. There are going to be some of the species that are very difficult to eradicate. We pledge that as the Plant Society pledges itself to be of any assistance that we can on this.  
And finally, on this question of traffic, it seems to me that over the years we have allowed this idea that the park becomes a commuter arterial. Up until the time that this new tunnel with all the ford crossings, it was more muted. We have to at some point say that the park is managed for the naturally functioning systems and that all other uses, including bicycles, cars, people usage has to be in accordance with the health and the vitality and the continuation of those natural systems.  
I have a great deal of sympathy for the people who say I don't want extra traffic in my neighborhood. But to simply say we're going to tolerate an increase in traffic through the park when we know it is damaging, we have got to get out of that. Maryland Native Plant Society prefers the 7 day closure similar to what's on the weekend now with one exception, and that is from time-to-time it would be worthwhile to have a car holiday, that is one in which cars are allowed into the park, perhaps in the spring for a couple of days, perhaps during the fall, color season under a reduced speed limit and outside of the commuting hours.  
If we need to talk about a compromise, I must say I'm very mystified by the compromise that we're talking about. That is, allowing the rush hour traffic and then closure during the day. I would prefer the opposite. And if it is to reduce the impact of the cars in the park, it would seem to me that the reasonable thing would be to keep the park auto free from 3:30 in the afternoon until 9:30 in the morning, allow people and cars under this regulated speed limit to coexist during the middle of the day.

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I'm concerned because I think we're probably not going to get what we're asking for. I don't want those of us who are basically part of this environmental community to continue supporting a compromise that really doesn't get us anywhere. I'll extend these comment and pass them in.

Oh, I'm sorry, one more thing. I do agree with a couple of the speakers who said that on balance the management plan doesn't quite cover enough things. And that's probably because you've been stuck with this question of how to deal with the traffic. I really think we need to get together and talk about all the other stuff and I don't know how we're going to deal with it.

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

Subject: Rock Creek Management Plan

Adrienne Coleman  
Superintendent, Rock Creek Park

Unfortunately, the Rock Creek Park Management Plan process has become merely a discussion a the road through Rock Creek Park. In keeping with this single focus, however, I have a suggestion that I think will solve some of the traffic problems in Rock Creek Park as well as save money that can be better used to preserve the beauty and function of Rock Creek Valley. I suggest that all one-way restrictions be removed from Rock Creek and Potomac Parkway. This practice makes it just too convenient to drive downtown rather than use public transportation. This return to two way traffic at all hours of the day and night would surely cut down on the volume of traffic in the morning and afternoon rush hours. The money used to monitor this car encouraging system (surely in the millions) could be reprogrammed to (1) improve the quality of water in the Creek (effective storm water management), (2)improve the natural function of the Valley (effective exotic invasive control),and (3) educate the public, especially school children, about the natural environment in their midst (effective outdoor education).

I think this is the time to re-examine this "crazy and eccentric" practice of one-way roads at different times of the day and give the Parkway back to the people who really enjoy the Parkway as a way of seeing the Park, not just as a fast and efficient commute.

Mary Pat Rowan  
Landscape Architect  
Founding and current Board Member, Maryland Native Plant Society (Washington, DC Chapter)

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MS. MacKIERNAN: Yes. Superintendent Coleman, my name is Gail MacKiernan. That's M-A-C-K-I-E-R-N-A-N. I'm representing the Maryland Ornithological Society. I'm on the state conservative committee and also conservation chair of the Montgomery County chapter.

I've read the management plan strictly from the point of looking at the natural resources, which National Park Service is mandated to protect. I find the draft management plan inadequate because it does not recognize, much less discuss it in any length, the importance of Rock Creek Park to migratory birds. The reference to migrants appears only in a very brief summary of birds in the park. It is extremely surprising, in fact rather dismaying since during the 1999 cell phone controversies, literally inches of testimony were delivered to the National Park Service on the importance of Rock Creek as a migratory corridor through the increasing urbanized D.C. area.

To reiterate, over 180 species of birds, including all the northeast wobblers, flycatchers and thrushers have been recorded in Rock Creek Park in the past decade, as well as numerous species such as Hummingbirds, swallows, jays and other migrants. Some species are found in extremely high numbers which rival internationally migratory hotspots such as Cape May and Point Pula in Ontario. Rock Creek is locally the top migrant hotspot in the D.C. area.

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

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

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

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

Third, and this is very important, the National Park Service should ensure that appropriate in-house or outside experts when necessary review and clear all management actions within the park which could impact living resources including birds. Right now I feel that there is sometimes a discount between the input from the national resources staff and the management of the park. Mrs. Rachlin in an earlier testimony talked about cutting down of dead trees. I actually examined some of those dead snags that were cut down. They contained active woodpecker borings and could very well have contained nests which went through the chipper. It would also help if you removed the—from the park, which was promised about 5 years ago.

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

Looking at the alternatives, we're not so concerned with the transportation alternatives per se, but we're very concerned about the potential for building the new administrative and U.S. Park Police headquarters at the maintenance yard, which as Ms. Rachlin said, is an important habitat for birds.

And since field habitat only represents 1.5 percent of the park habitat, I think it would be a good idea to enhance it and not destroy it.

#### **NEAL R. GROSS**

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3001 Veazey Terrace  
Apartment 1634  
Washington, DC 20008  
May 2, 2003

Superintendent  
United States National Park Service  
Rock Creek Park  
3545 Williamsburg Lane, NW  
Washington, DC 20008-1207

Re: draft General Management Plan/EIS Rock Creek Park

Dear Sir or Madam:

I am writing to comment on the draft General Management Plan/Environmental Impact Statement for Rock Creek Park and the Rock Creek and Potomac Parkway on behalf of the Melvin Hazen Community Garden Association. We are pleased to see that the plan recognized that Rock Creek Park is an "oasis for urban dwellers, offering respite from the bustle of the city". We agree that this is a significant feature of the Park.

We do not see any changes in policies regarding this type of developed facility in any of the four alternatives. We believe that Melvin Hazen Community Garden is a model community garden in the Washington DC area, with a diverse group of dedicated gardeners of all ages.

We applaud the United States Park Service for their continued support of community gardens in Rock Creek Park.

Sincerely,



Karin Adams  
President  
Melvin Hazen Community  
Garden Association

# MACKIERNAN COMMENTS ON DRAFT MANAGEMENT PLAN

July 12, 2003

To: National Park Service, Rock Creek Park  
Superintendent  
3545 Williamsburg Lane, N.W.  
Washington D.C. 20008-1207

Re: Comment on the Draft General Management Plan/ Environmental Impact Statement, Rock Creek Park and Potomac Parkway.

I would like to take this opportunity to comment on the Draft General Management Plan for Rock Creek Park. Most of this document (and most of the public input) has focussed on the traffic management options. However, as a professional biologist and a person well-acquainted with the park, I was interested to see what plans had been put forth for natural resource management. In particular, the completeness of information regarding migratory birds, as I have been participating in migration surveys in RCP for over 10 years.

Naturally, it was with considerable dismay that I found very little in the draft plan relating to migratory birds in general, and almost nothing specifically relating to bird migration in Rock creek Park itself. This is even though a tremendous amount of data had been submitted to the National Park Service during the 1999 hearings on cell phone tower construction in the park. (Particularly surprising considering the recent successful law suit against NPS, where lack of attention to potential impacts on migratory birds formed the basis of the court requiring a new EIS on the phone towers.) The inescapable conclusion is that the group preparing this draft plan were not given this information, or did not seek it out, and in fact, appear virtually unaware of the importance of the park as a migration corridor through urban Washington DC.

## Bird Migration in RCP, a Summary:

As the Washington region has urbanized, and as the city's forest cover has declined in recent decades, Rock Creek Park has become probably the major corridor in spring and fall for hundreds of thousands of migratory birds. Many of these are neotropical species (thrushes, warblers and so forth) which are showing significant population declines and all of which are protected under the federal Migratory Bird Treaty Act. Surveys conducted during the migration period in both spring and autumn for the past 10 years have recorded impressive numbers of migrants, and in fact, the park is widely recognized as the best place in the Washington area to observe bird migration (1,2). In a recent article, the National Audubon Society named Rock Creek Park as one of the top destinations in the USA to observe bird migration. As an example, a summary of results from the spring 2003 survey are being submitted by Mr. Barry Cooper as part of his comments on the management plan (3).

The importance of this phenomenon should not be underestimated. It is one of Rock Creek's unique natural features, not shared by any other NPS property in this region. This is, in part, a result of the unique orientation and topography of the park, which runs almost due north and south and thus forms a perfect migration "pathway." Most neotropical species migrate at night, orienting by the stars. They also preferentially follow ridges, and the forested ridges to the east and west of the stream are another positive feature of the park (4). Comparisons of bird numbers and diversity (on the same

day) at Rock Creek and flood-plain parks such as the C&O Canal dramatically reinforce this observation.

Naturally, such a unique phenomenon has not passed unnoticed by the public. On any given day during the peak of migration, dozens of birdwatchers may be seen on the west ridge of the park, where observation is easiest due to access roads and open glades from which the trees can be more easily scanned. Many of these visitors go to picnic areas 17/18, others to the vicinity of the Nature Center, while others survey the Maintenance Yard. During migration season, birders represent one of the major user groups for the park and yet they are barely mentioned in the draft management plan.

I identify three major problems with the Draft Management Plan:

**1) The biological data presented on birds is inadequate, despite the considerable amount of information provided in recent years to NPS and to the RCP management on both migratory and resident birds by scientists and naturalists.**

For example, the plan notes that "approximately 22-24 species of birds nest in the breeding bird census area in RCP." No data are submitted for the park as a whole. That number is much closer to 60 species, and the ongoing 5-year Maryland/DC Breeding Bird Atlas project (supported by Maryland Department of Natural Resources) is already adding to this total. Some breeders are common birds, such as Northern Cardinal, which nests widely throughout the park while others breed irregularly or in very localized areas (Yellow-throated Vireo, Barred Owl). The Audubon Naturalist Society has conducted its breeding bird survey in the vicinity of the Maintenance Yard since the 1940s, and although this survey is described, no data from it are presented. It would have been useful to know what changes have been recorded since the survey was initiated, and to have hypothesized as to causes. Finally, although several tables of bird (and other) species of concern to Maryland and Virginia are included in the Plan appendices, these are not put into any context – not even which (if any) of these bird species occur in RCP and when.

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

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

One of the major problems obvious to all RCP visitors is that of invasive plants, which affect park wildlife by crowding out native plant species and which may actually constitute a direct threat. Attached to this comment sheet is a page from the National Park Service's own publication relating the death of hummingbirds in RCP due to the exotic weed Burdock. I was one of the birders who found the trapped and dying hummingbirds, and since that time, we have released several other species from the velcro-like seedheads of the plant. Although the hummingbird pictured is now enshrined under a bell jar in the RCP naturalists' offices, and is taken around to demonstrate the

dangers of exotic plants, in the park itself Burdock still flourishes. In fact, in the Maintenance Yard it now occupies a much larger area than when this article was written. While the problem of eliminating invasive plants throughout RCP is monumental and discouraging, certainly RCP maintenance staff has enough manpower to eliminate this stand of weeds (as they promised 4 years ago).

Another issue involves inappropriate maintenance activities which take place with no apparent consultation with the RCP naturalist staff. In fact, there seems to be a complete disconnect between these groups – my understanding has been that activities affecting habitat within national parks always need to be reviewed by staff biologists, but this doesn't happen in RCP. Whether this is a communications problem or lack of management oversight, I cannot say, but as an example, this past spring contractors were busy cutting down and removing dead and dying trees in many areas of the park, at the height of the breeding season for hole-nesting birds and mammals (e.g. flying squirrels)! Many of the trees cut down had active woodpecker workings and may well have had active nests. If so, this may be a violation of the Migratory Bird Treaty Act, and is certainly a violation of NPS principles. When I questioned the naturalist staff, they told me that they had never been consulted and didn't know about the tree removal until they heard the chain saws! While dead trees must be removed when they threaten heavily-used public areas, except in an emergency this sort of routine work should be done in seasons when birds are not nesting. I was pleased to see (in the draft plan) a promise to "improve snag [dead tree] management" to enhance wildlife use, but whether this can be put into place without a revamping of the current way park maintenance operates is questionable.

There also needs to be a reduction of mowed areas, as has occurred in the Maryland sections of RCP. In the Washington sector of RCP, there are many areas regularly mowed which receive little or no use by the public and would be far better left to regrow native vegetation for the benefit of birds and in fact, all the park's wildlife. Further, meadows should be managed to enhance growth of native wildflowers and other forbs, not only summer grasses, which would require mowing areas by rotation. This does not now occur, and "no-mow" areas such as that at Military Field are primarily grass which is of limited wildlife value.

**Recommendation:** Develop a comprehensive plan to enhance habitat for birds (and other wildlife) which would include, at a minimum, removal of hazardous invasive plants (Burdock) and a start at removal of other invasives in areas most used by migratory birds, replanting of native species which provide food and shelter, protection of dead tree snags and appropriate timing and review of tree cutting, and identification and establishment of more no-mow areas in RCP. Coupled with this, the park must put into place rational and science-based oversight for management actions. If need be a technical committee of non-involved individuals could be formed to guide this planning. Tremendous expertise exists in the region, both within the government (NPS, USFWS, USGS) as well as within academia and NGOs to form such a group. Additionally, the training of volunteers to assist with removal of invasive plants and replanting efforts will probably be necessary due to resource and manpower limitations, and should be expanded.

**3. The draft plan barely mentions birdwatchers as a user group, and thus contains no suggestions to enhance the park experience for them. The park also is missing a unique opportunity to educate park visitors about the phenomenon of bird migration, which is taking place around them every year.**



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While this might not be as basic an issue as the first two, some rather low-cost actions could greatly enhance the park experience for birdwatchers and other nature lovers. Since birds are one of RCP's most unique natural resources, birds should form a more important focus of park activities and public outreach.

#### Recommendations:

- Provide information to the public on bird species in the park. A current effort in underway to redo the RCP bird checklist, which will be a great help. This list can be distributed at the Nature Center and similar places for park visitors. In addition, a Sightings Board should be placed in the Nature Center (ideally where it can be seen from outside when the center is closed) and Nature Center staff should keep this updated with interesting reports, not limited to birds (e.g. "migrating Monarch butterflies are now visiting flowers in Military Field.") Another possibility is a sightings clipboard for birders and others to enter interesting reports – these are available at many National Wildlife Refuges and National Parks. This clipboard would, however, have to be accessible at all times, not just when the Nature Center is open. Also, local bird club experts should be asked to lead bird walks or to give talks on birds to park visitors.
- Improve habitat around the Nature Center to attract birds. This is already partially underway, as a butterfly garden has been planted and a small "meadow" cleared. However, the latter is being rapidly invaded by non-native and some native forest trees, and will soon lose its open character unless it is more carefully managed. A small pond was a good addition, but needs a "bubbler" or "drip" to realize its potential to attract drinking/bathing birds. If this were provided, the location (near the paved trail and with ample benches) would be excellent for the less-active individual to sit and enjoy wildlife. The Nature Center has great potential to educate the public about bird migration, and perhaps interest a few of them in birdwatching or nature study as a hobby.
- Most birdwatchers would appreciate better attention to management of vegetation (see #2), protection of important migrant bird concentration areas (such as the Maintenance Yard) and other actions to improve habitat. They would also appreciate some common sense/courtesy – such as not mowing the major areas where birders congregate until after the peak observation times (that is, mid to late morning) during migration season. Control of off-lead dogs (which doesn't happen) and removal of free-ranging cats from the stable area would also enhance well-being of native wildlife, including birds.
- Design and build a display featuring bird migration. This might be an excellent project for which to seek outside funding or donations from a bird club or naturalist group. The display could illustrate the various species in the park, and might include charts showing the Atlantic flyway in general, the local route of birds through Washington, and a map indicating where many of the migrants breed and winter. The Nature Center already has a series of excellent small dioramas with mounted animal specimens and native plants. A similar diorama showing a tree top in RCP in mid-May, with mounts of some of the most brilliant migrants (Scarlet Tanager, Baltimore Oriole, various warblers, all of which pass through the park in large numbers in spring and fall) would be an excellent addition. It would also provide an opportunity to educate the public about hazards facing migrants and how they can help preserve this wonderful natural phenomenon. The commercial success of the movie "Winged Migration" shows that people in general find the story of bird migration endlessly fascinating.

If you have any questions about the issues raised in my comments, or would like further details, I can be reached by email at [gail@mdsg.umd.edu](mailto:gail@mdsg.umd.edu) or by telephone

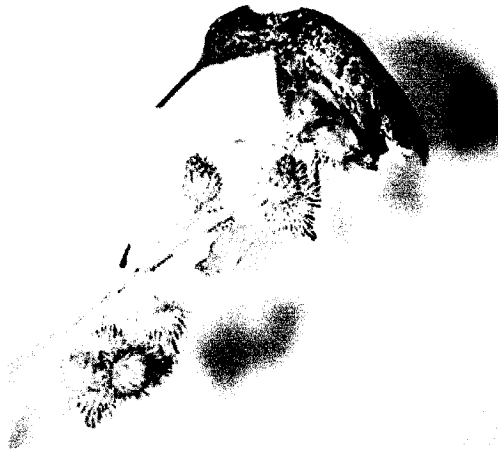
Gail B. Mackiernan  
Conservation Chair,  
Montgomery Co. Chapter of the Maryland Ornithological Society

#### References:

- 1) Wilds, C. 1993. Finding Birds in the National Capital Area. Smithsonian Institution Press, Washington DC.
- 2) Lehman, P. (compiler). 2002. A Birder's Guide to Metropolitan Areas of North America. American Birding Association, Colorado Springs, CO
- 3) Cooper, Barry. 1998, 2003. Summaries of autumn and spring migration surveys in Rock Creek Park, D.C.
- 4) Dr. Chandler S. Robbins, Patuxent Wildlife Research Center, personal communication.

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Page 7 of 7**From HIGHLIGHTS – Park Science, Vol. 19 (1) February 1999****National Capital****Hummingbirds succumb to vegetative 'Velcro®'**

Last September, birders at Rock Creek Park (Washington, D.C.) discovered four ruby-throated hummingbirds ensnared in the Velcro-like seed heads (photo) of common burdock (*Arctium minus*), a nonnative weed that had invaded a natural area near the park maintenance yard. Three of the hummingbirds were dead, but the group was able to free one that was still alive. Resource managers removed the 50-60 burdock plants, which can grow over 6 feet in height, and plan to control the species in the future.



(NPS photo by Rosa M. Wilson)  
One of four ruby-throated hummingbirds stuck to the Velcro®-like seed heads of burdock.

The occurrence came as a surprise to park staff and even an expert on burdock, leading to an investigation into the nature of the phenomenon. Could a loggerhead shrike have been the cause? Although the shrike is well known for impaling its prey on sharp objects such as thorns, the hummingbirds were not impaled; the recurved barbs of the seed head would have made this impossible. More importantly, the shrike is rare in this part of the country and at this time of year. A more likely scenario is that the tiny birds had been feeding at a nearby sunflower, lit on the burdock for a rest, and got entangled, sealing their fate.

An electronic note posted on the NPS Natural Resource Bulletin Board and a scientific literature search generated some answers. Other accounts of wildlife being caught and killed in burdock in

North America are on record. According to Martin McNicholl, an ornithologist in British Columbia, this plant species has been reported to occasionally kill small birds and brown bats (Science News 154(16):244); indeed, a resource manager at Wind Cave National Park (South Dakota) reported the death of a little brown bat in burdock at the park more than 10 years ago. And the problem also occurs in Eurasia, the native home of burdock. Most of the information, however, is anecdotal; a cursory literature search turned up very little scientific work that quantifies the impact of noxious weeds on birds and other wildlife.

Common burdock was first documented in this country in a flora published in 1672 and is now widespread in the United States and parts of Canada. Commonly used as a medicinal herb, the plant is also well-known to farmers and ranchers who consider it a serious agricultural weed. Burs can lodge in the skin, eyes, ears, mouth, throat, or stomachs of grazing animals, causing irritation and pain. In wild mammals such as coyotes or foxes, the burs can lodge in the fur, causing it to become matted and irritated.

The hummingbird-burdock incident at Rock Creek Park is a poignant example of yet another way exotic plant species imperil the health of natural ecosystems. This point was amplified at a September conference on exotic plants held at the Patuxent National Wildlife Visitor Center in Maryland. Hosted by the National Park Service, the conference focused on the management of exotic plants in general. A mount of one of the hummingbirds trapped in the seed head was displayed, however, and served as a graphic reminder of the importance of preserving native vegetation habitat for wildlife.

Unfortunately, burdock is not the only nonnative plant species that has invaded Rock Creek Park. Exotic vines such as porcelain berry, Asian bittersweet, and Japanese honeysuckle are choking out native vegetation and literally dragging native trees down to the ground, destroying the upper canopy where warblers and other birds nest and thrive. Add this park's problems with exotic plant species to those of every other unit in the national park system and the scale of the problem nationwide begins to become apparent. The problem is so large that funds to combat exotics, staff positions dedicated to their control, and an organized nationwide approach for dealing with them have lagged far behind their pervasive, deleterious influence.

In early February, President Clinton signed an executive order formulating a federal strategy to deal with the problems of exotic species. The order proposes an increase of nearly \$29 million for combating exotic pests and diseases and accelerating research on habitat restoration and biological integrated pest management tactics. An Invasive Species Council, chaired by Interior Secretary Babbitt, Agriculture Secretary Glickman, and Commerce Secretary Daley, will cooperate with a variety of groups to carry out the strategy.

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From: "Mt. Pleasant ANC1D" <anc1d@pacyniak.com>  
July 13th 2003

**"KEEP BEACH DRIVE OPEN" URGES MT. PLEASANT ANC**

We oppose any and all changes in the Rock Creek Park General Management Plan that proposes to close Beach Drive to automobile traffic, including a test closure," stated Mt. Pleasant Advisory Neighborhood Commission 1D in a resolution passed on July 7th , 2003.

The resolution responds to the draft Environmental Impact Statement and General Management Plan issued by the National Park Service on March 14th , 2003. The draft plan outlines four alternatives for managing traffic in Rock Creek Park. Three of the four alternatives would impose significant traffic restrictions on Beach Drive, and one proposal would completely close three portions of the road to automotive traffic. The National Park Service is currently soliciting commentary on the proposals.

The community of Mt. Pleasant is bounded on its north and west sides by Rock Creek Park. Beach Drive is one of the only north-south arteries easily accessible to Mt. Pleasant residents.

"Beach Drive links Mt. Pleasant residents with the District's downtown on weekdays, and with recreational opportunities on weekends," explains Commissioner Barbara Bitondo, the sponsor of the resolution. "In addition, closing Beach Drive would also block our access to emergency evacuation routes."

The resolution was passed unanimously by all commissioners in attendance.

The Mount Pleasant ANC is an elected body representing the residents of Mt. Pleasant. It advises D.C. government agencies and the city council on issues involving its constituents, and is a formal part of the D.C. government. The commission holds public meetings on the first Monday of each month at 7:30 pm at 3166 Mount Pleasant Street N.W.

**Dominic Sale 1D06 Mount Pleasant ANC1D**  
Chair

**RESOLUTION**

Business District Committee

**Will Grant 1D02**  
Vice Chair  
Crime and City Services  
Committee



**Peter Muller 1D05**

Treasurer P.O. Box 43529 Permits and Zoning  
Washington, DC 20010 <sup>Committee</sup> (202) 494-0630,  
anc1d@yahoo.com www.anc1d.org

**Barbara Bitondo 1D01**  
Secretary Latino Committee

**Jack McKay 1D03**

Commissioner Traffic and Parking Committee, Children and Schools Committee

**Jenny Babcock 1D04**

Commissioner Grants Committee Housing Committee  
[d1]July 7<sup>th</sup> 2003

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## RESOLUTION


### Opposing the alternative in the draft Rock Creek Park General Management Plan that would close three sections of Beach Drive to automobiles.

**Whereas** the National Park Service, Department of Interior, announced in the Federal Register on March 14, 2003, the availability of a draft Environmental Impact Statement and General Management Plan for Rock Creek Park, Washington, DC; and

**Whereas** the Environmental Impact Statement and General Management Plan evaluates the following four alternatives for Rock Creek Park: (1) Alternative A would generally retain the current scope of visitor uses with improvements in visitor safety and better control of traffic volumes and speeds through the Park by imposing a HOV 2 restriction during rush hour; (2) Alternative B would propose no actions at all; (3) Alternative C proposes to close three sections of Beach Drive to automobiles at all times and thereby eliminate traffic in much of the northern part of the Park; (4) Alternative D proposes to close three segments of Beach Drive in the northern portion of the Park to motorized vehicles for a 6 hour period during weekdays, from 9:30 am to 3:30 pm; and

**Whereas** Beach Drive is important to Mount Pleasant residents, lying along the western border of the neighborhood providing an important automobile link to downtown during the week, and a recreation area on weekends; therefore, let it be

**Resolved** that the Advisory Neighborhood Commission 1D opposes any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic, including a test closure.

<p><b>Dominic Sale 1D06</b> Chair Business District Committee</p> <p><b>Will Grant 1D02</b> Vice Chair Crime and City Services Committee</p> <p><b>Peter Muller 1D05</b> Treasurer Permits and Zoning Committee</p>	<p><b>Mount Pleasant ANC1D</b></p>  <p>P.O. Box 43529 Washington, DC 20010 (202) 494-0630, anc1d@yahoo.com www.anc1d.org</p>	<p><b>Barbara Bitondo 1D01</b> Secretary Latino Committee</p> <p><b>Jack McKay 1D03</b> Commissioner Traffic and Parking Committee, Children and Schools Committee</p> <p><b>Jenny Babcock 1D04</b> Commissioner Grants Committee Housing Committee</p>
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July 14<sup>th</sup>, 2003

Adrienne Coleman  
Superintendent, Rock Creek Park  
3545 Williamsburg Lane NW  
Washington, D.C. 20008-1207

Dear Ms. Coleman:

Please find enclosed a copy of a resolution passed by the Mt. Pleasant Advisory Neighborhood Commission 1D. This resolution represents the official comment of the Mt. Pleasant ANC 1D regarding the draft Environmental Impact Statement and General Management Plan for Rock Creek Park.

The Mt. Pleasant ANC 1D is the elected body representing the Mt. Pleasant neighborhood of the District of Columbia to the District's agencies and to the city council.

The community of Mt. Pleasant is bordered on two sides by Rock Creek Park, and it will be significantly impacted by any changes made to the General Management Plan. Therefore, please consider this comment seriously when making any decisions regarding the General Management Plan for Rock Creek Park.

Sincerely,

Dominic Sale  
Chair, ANC 1D



Enclosures

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<p><b>Dominic Sale 1D06</b> Chair Business District Committee</p> <p><b>Will Grant 1D02</b> Vice Chair Crime and City Services Committee</p> <p><b>Peter Muller 1D05</b> Treasurer Permits and Zoning Committee</p>	<p><b>Mount Pleasant ANC1D RESOLUTION</b></p> <p>☆☆☆</p> <p>██████████</p> <p>P.O. Box 43529 Washington, DC 20010 (202) 494-0630, anc1d@yahoo.com www.anc1d.org</p>	<p><b>Barbara Bitondo 1D01</b> Secretary Latino Committee</p> <p><b>Jack McKay 1D03</b> Commissioner Traffic and Parking Committee, Children and Schools Committee</p> <p><b>Jenny Babcock 1D04</b> Commissioner Grants Committee Housing Committee</p>
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July 7<sup>th</sup> 2003**RESOLUTION****Opposing the alternative in the draft Rock Creek Park General Management Plan that would close three sections of Beach Drive to automobiles.**

**Whereas** the National Park Service, Department of Interior, announced in the Federal Register on March 14, 2003, the availability of a draft Environmental Impact Statement and General Management Plan for Rock Creek Park, Washington, DC; and

**Whereas** the Environmental Impact Statement and General Management Plan evaluates the following four alternatives for Rock Creek Park: (1) Alternative A would generally retain the current scope of visitor uses with improvements in visitor safety and better control of traffic volumes and speeds through the Park by imposing a HOV 2 restriction during rush hour; (2) Alternative B would propose no actions at all; (3) Alternative C proposes to close three sections of Beach Drive to automobiles at all times and thereby eliminate traffic in much of the northern part of the Park; (4) Alternative D proposes to close three segments of Beach Drive in the northern portion of the Park to motorized vehicles for a 6 hour period during weekdays, from 9:30 am to 3:30 pm; and

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**Whereas** Beach Drive is important to Mount Pleasant residents, lying along the western border of the neighborhood providing an important automobile link to downtown during the week, and a recreation area on weekends; therefore let it be


**Resolved** that the Advisory Neighborhood Commission 1D opposes any and all changes in the Rock Creek Park General Management Plan that propose to close Beach Drive to automobile traffic, including a test closure.

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ANC 1D, PID 15

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<p><b>Dominic Sale 1D06</b> Chair Business District Committee</p> <p><b>Will Grant 1D02</b> Vice Chair Crime and City Services Committee</p> <p><b>Peter Muller 1D05</b> Treasurer Permits and Zoning Committee</p>	<p><b>Mount Pleasant ANC1D</b></p>  <p>P.O. Box 43529 Washington, DC 20010 (202) 494-0630, anc1d@yahoo.com www.anc1d.org</p>	<p><b>Barbara Bitondo 1D01</b> Secretary Latino Committee</p> <p><b>Jack McKay 1D03</b> Commissioner Traffic and Parking Committee, Children and Schools Committee</p> <p><b>Jenny Babcock 1D04</b> Commissioner Grants Committee Housing Committee</p>
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**For Immediate Release**

Contact: Barbara Bitondo (202-299-9418)

July 13<sup>th</sup> 2003

**KEEP BEACH DRIVE OPEN,  
URGES MT. PLEASANT ANC**

"We oppose any and all changes in the Rock Creek Park General Management Plan that proposes to close Beach Drive to automobile traffic, including a test closure," stated Mt. Pleasant Advisory Neighborhood Commission 1D in a resolution passed on July 7<sup>th</sup>, 2003.

The resolution responds to the draft Environmental Impact Statement and General Management Plan issued by the National Park Service on March 14<sup>th</sup>, 2003. The draft plan outlines four alternatives for managing traffic in Rock Creek Park. Three of the four alternatives would impose significant traffic restrictions on Beach Drive, and one proposal would completely close three portions of the road to automotive traffic. The National Park Service is currently soliciting commentary on the proposals.

The community of Mt. Pleasant is bounded on its north and west sides by Rock Creek Park. Beach Drive is one of the only north-south arteries easily accessible to Mt. Pleasant residents.

"Beach Drive links Mt. Pleasant residents with the District's downtown on weekdays, and with recreational opportunities on weekends," explains Commissioner Barbara Bitondo, the sponsor of the resolution. "In addition,

ANC1D PID 14

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closing Beach Drive would also block our access to emergency evacuation routes."

The resolution was passed unanimously by all commissioners in attendance.

The Mount Pleasant ANC is an elected body representing the residents of Mt. Pleasant. It advises D.C. government agencies and the city council on issues involving its constituents, and is a formal part of the D.C. government. The commission holds public meetings on the first Monday of each month at 7:30 pm at 3166 Mount Pleasant Street N.W.

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MS. COLLINS: My name is Laurie Collins. My address is in D.C. However, I'm here tonight to speak on behalf of the Mount Pleasant Neighborhood Alliance, a community association in Ward One of Mount Pleasant with a membership of approximately 500 residents. MPNA supports Alternative B as the preferred alternative for the following reasons.

Rock Creek Park's roadway not only make the scenic vistas, picnic areas, and hiking and biking trails of the park readily available to the public but they also serve as major transportation arteries within the District. As a roadway, residents of Mount Pleasant use Beach Drive all the time as a preferred alternative to other roads such as Connecticut Avenue and 16<sup>th</sup> Street to travel uptown and downtown. It is possible to drive from Mount Pleasant to Maryland and back again and only ever go through one traffic light while having a much more enjoyable travel experience than one would have on other congested, multi-lane routes.

Any new vehicular restrictions on Rock Creek Park's roadways would divert substantial traffic to other existing major north-south routes in the city such as 16<sup>th</sup> Street, 14<sup>th</sup> Street, Connecticut Avenue, Massachusetts, and Wisconsin. Such restrictions would add even more congestion to already severely overburdened major thoroughfares and our adjacent residential streets. The District and its citizens already suffer from the adverse transportation, economic, and environmental impacts of other federally imposed vehicular traffic restrictions. We don't need to add another.

If there is an identified need for more paved biking trails, then the answer is not to exclude the majority of current users from our historic parkways. Instead we need to look at enhancing existing trails or making new ones. The Park Service's own recommendations suggest that separate bikeways are the safest alternative. We may be able to enhance some of the under-utilized trails or create new paved trails away from the roadways.

We strongly oppose NPS's plan which would exclude automobiles from recreational daytime use of Beach Drive. We also strongly opposed any proposed testing of any closure alternative. Beach Drive and the other parkways in Rock Creek Park were created to provide broad public access to its beauty and should not be converted to commuters only roads or worse closed to traffic all together. Further restricting Beach Drive is another step toward completely eliminating the traditional and historic experience of touring Rock Creek Park and also would rob the public of cultural resources that so many D.C. residents and visitors have enjoyed and cherished.

Rock Creek Park is a national park dedicated for all people and was designed by Frederick Law Olmstead, Jr. with scenic parkways for driving and other amenities for picnicking, hiking, and horseback riding throughout its vast distances. As such, the park was designed as an inclusive facility accessible to all. The bicycle path was created in the late '70s and is enjoyed by many walkers, strollers, bicyclists, and skaters. While it may make sense to accommodate these additional recreation uses, it is not fair to do so at the expense of the vast majority of users and also contrary to the original intent and dedication of the park.

Further, the NPS preferred alternative does not have the support of the community-at-large. On the contrary, a community ground swell opposes blocking Beach Drive. This broadly based grassroots uprising against the National Park Service plan is based in many sound principles including sensible transportation policies, fairness, enhanced public safety, and respect for culture and history.

The NPS plan to close Beach Drive does a disservice to the public in favor of special interest politics. It is one thing to oppose a new roadway construction through established neighborhoods and green space. It is quite another for fringe special interest groups to take away our public roads for the benefit of a few.

These efforts cross the line from appropriate influence of public policy to self-serving pilferage of public property. As we have seen with Klinge Road, if control of Beach Drive is given over to marginal special interests, it may be lost forever. It is the sense of the Mount Pleasant Neighborhood Alliance that the current management plan for Rock Creek has been sufficiently successful and serves a purpose that generally benefits the citizens. The paraphrase Chris Brown, Chief, National Park Service, Rivers, Trails, and Conservation Assistance Program "Parkways are many things to many people, and that's one of their virtues." Thank you.

**NEAL R. GROSS**

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WASHINGTON, D.C. 20005-3701

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July 15, 2003

Ms. Adrienne Coleman, Park Superintendent  
National Park Service, Rock Creek Park  
3545 Williamsburg Lane NW  
Washington, DC 20008-1207

Dear Superintendent Coleman:

Thank you for the opportunity to provide comments on the Rock Creek Park & Rock Creek and Potomac Parkway Draft General Management Plan. The following are submitted on behalf of the more than 300,000 members of the National Parks Conservation Association (NPCA). Founded in 1919, NPCA is America's only national private, nonprofit advocacy organization dedicated solely to protecting, preserving, and enhancing the National Park System.

**America's largest natural national park in an urban area:** Rock Creek Park was established in 1890 "as a public park or pleasure ground for the benefit and enjoyment of the people of the United States." It not only provides a forested oasis in the nation's capital, but also a window into the area's human history. It offers a variety of recreational opportunities to the region's 4.2 million residents, in addition to opportunities for studies of natural and human history.

Rock Creek Park faces numerous challenges due to its extended, irregular configuration; encroachment on its borders by private development; invasive plant and animal species; its use in recent decades as a commuter thoroughway; and storm water drainage into Rock Creek and its tributaries.

**Commuter traffic threatens park resources:** The key issue the draft GMP seeks to resolve relates to traffic on Beach Drive in the northern area of the park. Beach Drive was originally designed to provide recreational access to Rock Creek valley. Until 1966, motor vehicle traffic on Beach Drive included fording Rock Creek in several places, so few would have considered that drive for purposes other than to visit the park. With completion of the tunnel near the National Zoo and bridges over the fords, Rock Creek Park became a thoroughway to other destinations, and not solely a destination. In 2002, of the park's more than 14 million visitors, more than 12 million were simply driving through. (NPS Statistical Abstract, 2002)

Restoring Rock Creek Park and managing it for its natural and historical resources are in direct conflict with its use as a commuter thoroughway. NPCA supports application of traffic calming measures as proposed in the draft GMP, and additional measures to reduce commuter traffic in the park. Closing Beach Drive to motorized vehicles during weekday non-rush hour periods as proposed in Alternative D is a reasonable interim step towards reducing traffic in the park.

Weekend closures of Beach Drive have provided an unbroken paved trail from Memorial Bridge across the Potomac River to the Maryland line, linking the park to an expanding regional network of trails, and successfully encouraged non-motorized recreational use. There is no parallel trail in the subject area. Due to the steep, rocky character of Rock Creek Gorge, in addition to severe funding shortfalls for park projects generally, construction of a separate trail is unlikely.

However, if the park seeks to restore Rock Creek Park and fulfill its purpose and potential as a functioning natural ecosystem and a haven for wildlife in addition to a scenic and recreational park, area decision makers and the public must work with the park to support measures to remove commuter traffic from the park, and to manage storm water in ways other than simply letting it dump into the creek and its tributaries.

**Raising the profile of the region's model network of parks could improve multi-modal transportation options:** We are encouraged that the NPS is working with the City of Washington on planning for the DC Circulator, and has included Rock Creek Park in the transportation planning process for the National Capital Region. We urge the NPS to pursue multi-modal transportation alternatives that serve as many parks as possible throughout the greater metropolitan area, including Rock Creek Park. Even though the NPS study is geared towards visitors, it could serve local residents to some degree also.

Local authorities and the Park Service have spent tens of millions of dollars already creating and enhancing a regional network of paved trails, many through the various units in the National Capital Region like Rock Creek Park. This kind of continuous alternative transportation option that converges at the monumental core provides a perfect example of a model network of parks. Model parks represent a variety of



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transportation challenges and needs typical across the National Park System. They should receive funding to implement innovative strategies for improving congestion, cleaning the air, minimizing resource impacts, and providing a quality experience for park visitors.

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

Thank you again for this opportunity to comment.

Sincerely,

Jessica Butts

National Parks Conservation Association

MS. COOPER: Hi. My name's Barry Cooper. I represent the Neo-Tropical Bird Club. I live in Silver Spring, Maryland.

I really came to present tonight, because I was concerned with one element of the management plan, and basically I'm echoing the previous speakers. My wife's concerns regarding the potential development of the rough meadow behind the maintenance yard to an administrative building.

The person who wrote the comments on your management plan states the actions would be in an already disturbed area with low habitat value and would have little effect on wildlife. Well, I'm afraid that person was not fully aware of the value of that meadow, which is situated in the center of this beautiful pristine upland hardwood forest and is an absolute magnet for neo-tropical bird migrants that pass through, actually, in the tens of thousands.

And if I could just quote from a book written by world renown ornithologist Claudia Wilds, who actually lived in the District of Columbia where she references Rock Creek Park. And she mentions the high ridge, the western ridge, on the west bank of Rock Creek Park between Broad Branch and Military Road is the best wobbler trap in the park. And also specifically addressing the maintenance yard field. "This is the best field habitat in the park."

The statements of the importance of this field based on approximately ten years of spring and autumn neo-tropical migrant bird surveys that Dr. MacKiernan and I have conducted using our most recent surveys for the spring of 2003, we have visited the area and surveyed the birds in the hardwood forests around the nature center and particularly the maintenance yard on 23 days this spring, totaling over 100 hours. And we have surveyed and counted over 20,000 species of neo-migrants. This includes virtually all the warblers, flycatchers, veros, thrushers that occur in northeastern United States and Canada. Nineteen of these species are listed in your management report as being threatened by the state of Maryland's Department of Natural Resources. Two of these species have also been listed as threatened by 13 northeastern states, their natural resources. These are the Canada wobbler and the gold wing warbler. And one species of the warbler is presently proposed for listing under the Endangered Species Act.

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I can assure that you species occurs in the immediate vicinity of the maintenance yard. And also if it is accepted under the Endangered Species Act, I think it'll have serious implications for managing its habitat.

That's basically all I've got to say.

I just would end by absolutely recommending the preservation and enhancement of a rough meadow in the maintenance yard as a critical environmental habitat and absolutely do not move forward with the proposed destruction of this habitat as outlined on page 182 of your management plan.

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

From: Barry E. Cooper

National Park Service, Rock Creek Park  
Superintendent  
3545 Williamsburg Lane, N.W.  
Washington D.C. 20008-1207

Re: Comment on the Draft General Management Plan/Environmental Impact Statement, Rock Creek Park and Potomac Parkway.

My comments are quite limited, and directed to the preservation of the Park's natural resources. In this regard, I note that the National Park Service's first Mission Goal is as follows: "The natural and cultural resources and associated values of Rock Creek Park are protected, preserved and maintained in good condition and managed within their broader ecosystems or cultural context." [see P.14 of the Draft General Management Plan].

I fully support and agree with this Mission Goal and wish to discuss this in the context of one of Rock Creek Park's most important natural resources: the spectacular concentration and diversity, both spring and autumn, of neotropical bird species which migrate through the Park. Please see the attachment for the most recent data on this phenomenon. The following is a brief summary:

- Thirty-four species of warblers are recorded on migration during most springs and/or autumns at RCP, out of a total of thirty-five species that occur in northeastern U.S.A and Canada. Several of these species are ranked by the Maryland Dept. of Natural Resources at various levels of concern [see page 331-2 of the draft General Management Plan], two species are considered to be threatened per the Northeast Endangered Species and Wildlife Diversity Technical Committee and one species, Cerulean Warbler, has been proposed for listing under the Endangered Species Act.
- All six vireo species that occur in northeastern USA and Canada are recorded regularly each Spring and/or autumn at RCP.
- This spring all seven thrush species that occur in northeastern USA & Canada were recorded at RCP. This includes one species, Bicknell's Thrush, that is a candidate for listing under the Endangered Species Act.
- About sixty species of neotropical birds were recorded at RCP during our 2003 spring survey totaling at estimated 30,000+ individual birds. These birds were counted in an approximate one-half mile square area with its center in the RCP Maintenance Yard (thus the actual number along the west ridge would be considerably larger). Many of these species are experiencing very serious population declines both

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within the Washington Metropolitan Area and throughout much of the northeastern USA.

As is quite clear from our data the West Ridge of RCP and in particular, the rough meadow habitat at the rear of the Maintenance Yard is an extremely important feeding and resting area for a large number of neotropical birds.

It therefore came as a major concern that on page #182 of the draft General Management Plan and Environmental Impact Statement the following was stated: "If suitable commercial space cannot be located outside the park, new park administrative or U.S. Park Police facilities could be constructed at the park maintenance yard or the H-3 stables area respectively. **These actions would be in already-disturbed areas with low habitat value and would have little effect on wildlife.**" [emphasis mine]

While the rough meadow area of the Maintenance Yard appears untidy and superficially may appear to be of very low habitat value, the opposite is actually the case. Most neotropical migrants fly during the night and at dawn are searching for suitable habitat to feed and rest during the daytime. Rock Creek Park's forest and adjacent vegetation provides vital fruit, seeds and insects for migrants. Particularly attractive to many species are the bushes, vines and grasses found in meadow and forest edge environments, which are increasingly rare in Washington's urban setting. The Maintenance Yard, cited in Claudia Wild's book [Finding Birds in the National Capital Area] as the "best field habitat in the Park," is a prime example of this type of environment. This is based not only on over ten years of detailed survey work but on the observations of many other individuals. It is perhaps not unexpected that some of the most unusual migrants ever recorded in Rock Creek have appeared (and stayed, sometimes for many days) in this rich feeding area. These include Clay-colored Sparrow, Lark Sparrow, Sedge Wren and Mountain Bluebird. Rather than destroying this unique area, it is recommended the National Park Service take steps to preserve and enhance this habitat.

(Attached is the summary data from our migration survey, spring, 2003)

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# **ROCK CREEK BIRD MIGRATION – SPRING, 2003**

**April 16th – May 22, 2003**

**Barry E. Cooper**

Gail Mackiernan and Barry Cooper have been undertaking surveys of bird migrants [predominantly neotropical species] that pass along Rock Creek Park's West Ridge every spring and fall for the past ten years. It is estimated that approximately 150 observer hours were spent conducting this survey during the Spring, 2003.

Migratory bird surveys were conducted on 25 days during this 42-day period. The count area consisted of approximately one half-mile square, with the center being the Rock Creek Maintenance Yard. The majority of the neotropical & other migrant bird species listed below, therefore, were surveyed either in the Maintenance Yard or in its immediate vicinity. These migrant birds are surveyed during the first 3-4 hours after dawn and are typically observed in large rapidly moving flocks. As such we estimate that we identify not more than 25% of the total birds present on any given day. *Therefore, the actual total number of migrant birds moving through the Maintenance Yard area during the days surveyed is well in excess of 20,000 individuals.*

Moreover, the migrant birds are moving through this area, at varying levels, throughout the Spring [not just on the days surveyed]. As our survey was conducted on only about 60% of the days during the peak period of spring migration, the true number of neotropical and other migrant birds passing through the Maintenance Yard and its immediate vicinity is even larger. Using our survey data [see below] and extrapolating for the days when no survey was made, the estimated number of neotropical and other migrant bird species utilizing the Maintenance Yard and its immediate vicinity is an incredible 33,000 individual birds.

Even this does not address the complete picture, as many shorter distance migrant species such as White-throated Sparrow, Cedar Waxwing, Blue Jay American Robin [to name just a few] move through this important area each spring and autumn. These species are not covered by our survey work but number in the hundreds on many days. If these birds were also enumerated, the total number of migrants moving through the Maintenance Yard and vicinity during the spring migration would increase by many thousands of individual birds.

These numbers are very large and illustrate the high biological importance of both the Maintenance Yard and the whole of the West Ridge for migratory bird species in the spring.

Migratory bird numbers utilizing this area are even greater in the fall when, in addition to the adult birds, many birds that were raised during the summer breeding season are now passing through Rock Creek Park.

Several species recorded each spring in the Maintenance Yard are listed by the Maryland Dept. of Natural Resources as being threatened or endangered and two species is presently under consideration for listing under the Endangered Species Act.

Species	Total number of birds/ days recorded
Yellow-billed Cuckoo	79/ 14
Black-billed Cuckoo	12/8.
Ruby-throated Hummingbird	13/9
Eastern Wood-Pewee	26/7
*Olive-sided Flycatcher	2/2
Acadian Flycatcher	14/8
*Least Flycatcher	4/4
Great Crested Flycatcher	30/13
Eastern Kingbird	18/7
Red-eyed Vireo	420/20
Ruby-crowned Kinglet	42/8
Blue-Gray Gnatcatcher	220/20
Wood Thrush	115/19
Swainson's Thrush	37/12
Grey-cheeked Thrush	8/3
Bicknell's Thrush	1/1 This species under consideration for ESA listing by USFWS.
*Hermit Thrush	19/4
Veery	19/9
White-eyed Vireo	15/9
Yellow-throated Vireo	4/4
Blue-headed Vireo	18/8
Red-eyed Vireo	350/19
Warbling Vireo	2/2
Blue-winged Warbler	7/4
*Golden-winged Warbler	1/1 This species is considered to be threatened per the Northeast Endangered Species & Wildlife Diversity Technical Committee [formed by 13 northeastern states' wildlife agencies].
"Brewster's" Warbler	1/1
Tennessee Warbler	7/6
Orange-crowned Warbler	1/1
*Nashville Warbler	16/9
Northern Parula	152/17
Black and White Warbler	96/18 (collection of nesting material observed at two separate locations)
Black-throated Blue Warbler	186/17
Cerulean Warbler	3/2 (recently proposed for ESA listing by USFWS)
*Blackburnian Warbler	21/10
Chestnut-sided Warbler	66/13
Cape May Warbler	7/4
Magnolia Warbler	127/19
Yellow-rumped Warbler	2000/22

Black-throated Green Warbler	92/15
Prairie Warbler	2/2
Bay-breasted Warbler	17/8
Blackpoll Warbler	220/20
Pine Warbler	1/1
Palm Warbler	31/9
Yellow Warbler	13/11
*Mourning Warbler	4/4
Kentucky Warbler	2/2
*Canada Warbler	52/12
This species is considered to be threatened per the Northeast Endangered Species & Wildlife Diversity Technical Committee	
Wilson's Warbler	20/9
Hooded Warbler	6/5
Worm-eating Warbler	6/4
Ovenbird	151/19
Louisiana Waterthrush	3/3
Northern Waterthrush	4/4
Common Yellowthroat	132/22
Yellow-breasted Chat	1/2
American Redstart	110/20
Rose-breasted Grosbeak	16/6
Blue Grosbeak	2/2
White-crowned Sparrow	1/2
Lincoln's Sparrow	6/4
Baltimore Oriole	15/6
Bobolink	7/4
Scarlet Tanager	183/22
Summer Tanager	1/1

\* These species are listed on Table E.4: State Listed Animal Species in Maryland on Pages 331-2 of Rock Creek Draft General Management Plan.

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The People's Alliance for Rock Creek

The People's Alliance for Rock Creek

<http://www.rockcreekpark.net/faqs.htm>

## Frequently Asked Questions

## Beach Drive Recreation Zones FAQs

Q: What would the Park Service preferred option do to Beach Drive?

Q: What portions of Beach Drive would be affected?

Q: Why can't all Park users share the road as they do now?

Q: Why not just build a paved trail along Rock Creek in this section?

Q: Won't closing these sections to auto traffic create traffic problems in surrounding neighborhoods?

Q: What about the need for evacuation routes from the city in case of emergency? Won't this proposal block an important evacuation route?

Q: What about car access to sites in the Park?

Q: What about East-West traffic crossing the Park?

Q: Won't this proposal deprive the elderly and handicapped from accessing the Park?

Q: What would the Park Service preferred option do to Beach Drive?

A: The Park Service proposes to restrict auto traffic on three sections of Beach Drive in order to allow recreational use of the road on weekdays from 9:30 AM to 3:30 PM.

Q: What portions of Beach Drive would be affected?

A: The same three sections now closed to motor vehicles on weekends – a 2-mile section from Broad Branch Road to Military Road, and two shorter sections north of Military.

Q: Why can't all Park users share the road as they do now?

A: Park users don't share the road now, because it's too dangerous. North of Broad Branch Road, the only pavement in the valley is Beach Drive, a narrow road with 9 substandard/blind curves that contribute to a high accident rate. While traffic volumes on the road are quite low during non-rush hour periods, the road is too narrow and the curves too blind to permit pedestrian access. As a result, there is no safe way for families with children, skaters, dog walkers, runners, cyclists, etc. to access this part of the Park unless traffic is restricted.

Q: Why not just build a paved trail along Rock Creek in this section?

A: There is not enough room in the narrow rocky gorge above Pierce

[PARC Home](#)[Take Action](#)[Volunteer Now](#)[General Management Plan](#)[10 Great Things to do in Rock Creek National Park](#)[PARC FAQ's](#)  
(updated 05-15-2003)[The Case for Weekday Recreation Zones - in pictures](#)[Political Endorsements](#)[Traffic Study](#)

Enter your email

  
 Zipcode  
 Ward/District  
 Name  

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## 10 GREAT THINGS TO DO



## IN ROCK CREEK PARK



Mill to construct a trail without irreparably damaging the creek and the Park.

Q: Won't closing these sections to auto traffic create traffic problems in surrounding neighborhoods?

A: No. Only 150-250 cars per hour use Beach Drive in each direction during the hours in question. Spread over at least four parallel routes on both sides of the Park, there will be no noticeable impact on traffic.

For example, Connecticut Avenue now carries about 32 cars per minute during non-rush periods. Under the proposal, an additional 2 cars per minute would be added to the load, bringing it to 34. This compares to 65 cars per minute on Connecticut during rush hour. Similarly, other roads paralleling the Park will see increases of 2 or fewer cars per minute.

Q: What about the need for evacuation routes from the city in case of emergency? Won't this proposal block an important evacuation route?

A: No. This proposal has no effect on the availability of Beach Drive as an evacuation route, because no permanent barriers would be built. To reopen the road to auto traffic, all one would need to do is swing open the temporary gates. This takes less than one minute.

Q: What about car access to sites in the Park?

A: Auto access to virtually all picnic areas, the golf course, the stables, and tennis courts would be preserved, just as it is now on weekends.

Q: What about East-West traffic crossing the Park?

A: All East-West routes would remain open to cars under the Park service proposal.

Q: Won't this proposal deprive the elderly and handicapped from accessing the Park?

A: No. In fact, it will improve access for the elderly and handicapped by permitting them to use the only smooth surface in the valley without fear of traffic. For those who only wish to drive through the valley, the proposal still leaves 18 hours per weekday when all sections of Beach Drive will be open to cars. In addition, more than 90% of the roads in the Park will remain open to cars at all times.

African American Environmentalist Association · American Discovery Trail Society · American Hiking Society · American Lung Association of DC · American Running and Fitness Association · Anacostia

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The People's Alliance for Rock Creek

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<http://www.rockcreekpark.n>

Watershed Society · Audubon Naturalist Society · Bicycle Federation of America · Coalition for the Capital Crescent Trail · Center for Environment, Commerce, and Energy · Center for Renewable Energy and Sustainable Technology · College Park Area Bicycle Coalition · Committee of 100 on the Federal City · Crestwood Neighborhood League · DC Bicycle Courier Association · DC Clean Air Network · DC Statehood Green Party · DC Road Runners Club · DC Velo Club · Friends of Meridian Hill · Friends of the Earth · Friends of the Rock Creek Horse Centre · Friends of the W&OD · Institute for Local Self Reliance · International In-line Skating Association · Latin American Youth Center · League of American Bicyclists · Mid-Atlantic Off-Road Enthusiasts · Montgomery County Outdoor Education Association · Montgomery County Road Runners Club · The Potomac Conservancy · Potomac Pedalers Touring Club · Rails to Trails Conservancy · Reed-Cooke Neighborhood Association · Road Runners Club of America · Scenic America · Sierra Club / Montgomery County Group · Trash Force · Urban Rangers · Virginia Bicycling Federation · Walk DC · Washington Area Bicyclist Association · Washington Area Rollerskaters · Washington Parks and People · Washington Regional Network for Liveable Communities

MR. MCCARTHY: My name is Jim McCarthy, M-C-C-A-R-T-H-Y. I live in Chevy Chase, D.C. I'm speaking as coordinator of the People's Alliance for Rock Creek which is a coalition of more than 30 organizations with more than 50,000 members in the Washington area who support the National Park Service plan Alternative D.

I want to commend you for taking this step which I know from the comments here tonight was not an easy one. It is a tremendous step forward in terms of restoring the balance of values in the park and treating the park as a park rather than simply a thoroughfare. There have been a number of people commenting about the history of the park and the fact that it was set up in 1890 and that as part of the legislation the words "scenic drives" were mentioned.

That's a very interesting point and an appropriate point to raise. But as we all know, in 1890, the automobile had not been invented yet. So the scenic drives that were referenced by Congress at that time were scenic drives in horse-drawn carriages at probably less than 10 miles per hour. This is not what is occurring in the park today. In the park today, people are driving 35 to 40 miles an hour around blind curves in cars that have their windows closed who cannot experience the park in any meaningful way. They are simply using the park as a roadway.

One of the reasons they do that is because in the 1960s in a rather mistaken move a tunnel was built at the zoo which turned the park from a destination itself and a place in which people did recreation into a thoroughfare. It linked Beach Drive which at that point was essentially a rural experience - you had to drive through the creek at many places in order to continue on the road - with Rock Creek Parkway making it available as a commuting road. This entirely changed the character of the park, made it impossible for people to use Beach Drive during the week for recreational purposes, and as a result we're here today trying to deal with the impacts of that and trying to restore that balance.

I wanted to say something also about cars. Most of us use cars to get to Rock Creek Park. Many of us drive through the park at various times. Driving through the park is a pleasant experience. There's no doubt about that. But the presence of cars on the upper portions of Beach Drive make any other use of that roadway impossible. The road is designed as a scenic drive. There are nine blind curves simply between Broad Branch and Military Road.

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If you are a cyclist, a rollerblader, a runner, you never know what's coming around one of those blind curves. It means that there are very few people who use that part of the park for recreation during the week. I hear people commenting who would use it. I've been down there. I've seen it. No one is running on that road. No one is using it for bicycling.

Well, there's a reason. It's too hazardous. Only by doing something like Alternative D will the Park Service restore a balance and make it possible to use this tremendous asset that is Rock Creek Park as the asset it was intended to be as recreational and a place that restores our soul. I want to thank you very much for this public meeting and a chance to offer comments. We will submit detailed, written comments before July 15. Thank you very much. We applaud you very much in choosing Alternative D.

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

MR. HARNIK: Good evening. I'm Peter Harnick. I'm the original founder of the People's Alliance for Rock Creek Park, not the one from 1996, but the original People's Alliance for Rock Creek Park back in 1980. And I actually want to dedicate my testimony to James Redmond. Some of you may remember. Jim Redmond was the Superintendent of Rock Creek Park in the 1970s. Jim was the guy who took the leap to say let's see what we can do with this park, let's open this up for the weekend people use on upper Beach Drive.

A lot of the speakers that have spoken for the last couple of nights have, you know, treat the weekend closures like well this is no big deal. Of course, the weekend is fine and its non-controversial. But they don't remember what happened back in 1980 that the weekend closures were extremely controversial, as controversial as this, if not more. Nobody had ever conceived of a park without cars in it.

And Jim held these hearing, somewhat similar to what's going on now. There was a lot of back and forth. He said let's give this a try. If it doesn't work, we'll do something different. And he did give it a try and it was phoneminally successful and it was successful enough to actually increase the hours from Sundays to Saturdays and Sundays, to Saturday, Sundays and holidays. And I think we all agree that it's the busiest most people oriented and people used section of the park.

And so I commend you—it's take a long time. It's taken too long, but I commend you for taking this step. I support alternative D. Let's give it a try. As a bicyclist I'd prefer that you did more, but let's go ahead and take this leap and see how it works. And if it doesn't work, we'll try something different.

I think this is a great idea. It's great for the park.

In my day job I study city parks around the country and I've made a particular—pay particular attention to what goes on with cars in parks. And I think I can say that without exception every single car park that has eliminated portions or entirely eliminated cars from the park has been significantly improved by doing that.

Central Park in New York. Total turnaround in that park from being dangerous, shunned to being a fabulous place that's used by millions of people. Prospect Park, Piedmont Park in Atlanta, many other locations.

So I think what you're doing is terrific. I think it's going to make the park better.

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And I guess my one suggestion where I think the Park Service falls down badly on the job is that your signage is so weak, poor and nonexistent that most Washingtonians are confused most of the time about where things are and how the park works. And if you put in a decent signage system—you'd—I think you'd get much more support for this entire proposal.

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

### PEOPLE'S ALLIANCE FOR ROCK CREEK (PARC)

African American Environmentalist Association \* American Discovery Trail \* American Hiking Society \*  
Anacostia Watershed Society \* Audubon Naturalist Society \* Coalition for the Capital Crescent Trail \*  
Center for Environment, Commerce, and Energy \* College Park Area Bicycle Coalition \* DC Bicycle Courier Association  
DC Clean Air Network \* DC Statehood Green Party \* DC Velo Club \* Friends of Meridian Hill \* Friends of the Earth \*  
Friends of the W&OD \* International In-line Skating Association \* Montgomery County Outdoor Education Association  
Metroped, Inc. \* Montgomery County Road Runners Club \* Potomac Pedalers Touring Club \* Rails to Trails Conservancy  
Reed-Cooke Neighborhood Association \* Reston Bike Club \* Sierra Club of Montgomery County \* Sustainable Montgomery  
The Potomac Conservancy \* Trash Force \* Virginia Bicycling Federation \* Washington Area Bicyclist Association \*  
Washington Area Rollerskaters \* Washington Parks and People \* Washington Regional Network for Liveable Communities

July 15, 2003

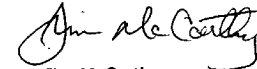
Ms. Adrienne Coleman  
Superintendent, Rock Creek Park  
National Park Service  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008-1207

Dear Superintendent Coleman:

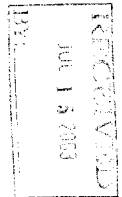
Attached are comments on the Draft General Management Plan for Rock Creek Park, prepared for the People's Alliance for Rock Creek (PARC). These comments were prepared by Jim McCarthy and Rick Morgan, Coordinators of PARC.

We would be happy to answer any questions regarding these comments. You can reach Mr. McCarthy at (202) 362-7614 or Mr. Morgan at (202) 364-3663. We look forward to working with you as you implement the preferred alternative.

Sincerely,



Jim McCarthy  
Coordinator





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# COMMENTS OF THE PEOPLE'S ALLIANCE FOR ROCK CREEK ON THE DRAFT GENERAL MANAGEMENT PLAN FOR ROCK CREEK PARK

The People's Alliance for Rock Creek (PARC) is an alliance of 33 local and national groups that support enhanced recreational opportunities and facilities and better environmental protection in Rock Creek Park. A full list of the organizations supporting PARC is attached to these comments. In addition to supporting PARC, many of these organizations will be submitting their own comments.

**PARC views the impact of car traffic on Rock Creek Park, and the continued management of Beach Drive to facilitate the movement of automobiles through the Park as major problems.** Therefore, we applaud the National Park Service for its proposal to begin addressing this issue, and **we support your proposal to adopt Alternative D**, providing for weekday closure of portions of Beach Drive to allow its use for recreational purposes.

**We believe your proposal (as well as Alternatives C and A) are in line with the Park Service's mission** to "provide for the preservation from injury or spoliation of all timber, animals, or curiosities within said park and their retention in their natural condition, as nearly as possible," (1890 legislation establishing the Park) as well as the National Park Service Organic Act and other legal mandates. **Adoption of Alternative B, with its failure to take any steps to address the problem of traffic, would be to fail in that mission.**

In addition to organizing the efforts of its supporting organizations, PARC has been the main point of outreach to the public in favor of Alternative D during the General Management Planning comment period. We organized an information table in Rock Creek Park on weekends beginning in late April, and more than 1,000 Park users stopped at this table to express their support for enhanced recreational access to Beach Drive on weekdays. Attached to these comments are copies of postcards supporting Alternative D signed by 1,105 of these visitors, many of whom added comments and suggestions in addition to signing. PARC's experience operating this table has confirmed that **recreational users of the Park are overwhelmingly in favor of your proposal to establish weekday recreational zones.**

These comments are organized in five sections. First, we express our support for Alternative D and explain why we believe the establishment of weekday recreational zones in Rock Creek Park is important. Second, we address other issues raised (or, in some cases, not raised) by the General Management Plan. Third, we address issues raised by opponents of Alternative D. Fourth, we address technical issues, including what we believe is a major error in the plan's traffic analysis, which has resulted in an overstatement by the National Park Service of the number of cars that would be displaced by closing portions of Beach Drive. Finally, we discuss our continued belief in the need for a test of alternatives, and we agree with the Park Service that the plan must allow operational flexibility.

**1. Why We Support Alternative D.** Rock Creek Park was established in 1890 "as a public park or pleasure ground for the benefit and enjoyment of the people of the United States." Although roads were laid out in the Park at an early date for use by horses, carriages, bicycles, and eventually automobiles, the Park was essentially a quiet natural oasis in the

middle of the city until the mid-1960s. Auto travel on Beach Drive was slow and cumbersome during this period, requiring fords of the creek in several places. Few people commuted by car during these years, and most of those who did would have avoided the Park because of the slowness and difficulty of driving in it.

In the 1960s, however, the completion of the Zoo tunnel and the replacement of the last of the fords through Rock Creek brought a dramatic change in the character of the Park. Rather than serve primarily as a destination in itself, the Park became a place to pass through on the way to somewhere else. By the 1990s, 12.4 million trips through the Park were occurring annually, while only 2.1 million visitors actually stopped to visit (statistics are from p. 142 of the draft GMP).

In the early 1980s, at the suggestion of PARC, the National Park Service took a major step toward restoring the balance of uses in the Park, initiating weekend closures of three sections of Beach Drive so that they could be used by cyclists, pedestrians, and other recreational users. By closing the three sections, the Park Service created an unbroken paved trail extending the entire length of the Park, encouraging non-motorized use. These steps were opposed by many, who argued (then, as now) that the closure of Park roads at any time would disrupt traffic, make it more difficult to access the Park, and create negative spillover effects in surrounding neighborhoods as autos searched for alternative routes.

But the concerns proved unfounded. Traffic on surrounding roads and access by car to the Park's other attractions were largely unaffected by the closures. And **car-free sections of Beach Drive were a phenomenal success: the recreational use of the road on weekends became a major reason for people to visit Rock Creek Park. In the 1990s, 2,075,000 visitors came to the Park for recreation, nearly double the 1980 figure of 1,060,000.** (p. 143) Visits to the Park's historic and educational facilities declined during this period. PARC concludes that it was the closure of Beach Drive that was the major factor in increasing visits to the Park.

Alternative D would close the same three sections of upper Beach Drive to through traffic for six hours every weekday. We support this Alternative for several reasons. First, **establishment of recreational zones will provide access to the scenic heart of the Park for runners, cyclists, and pedestrians on weekdays for the first time.** This is an important step toward restoring the balance in Rock Creek Park, which is dominated by auto use Monday through Friday. Second, there is no parallel trail in the areas that would be closed. **Without road closure, the Park's north-south paved trails are fragmented and discontinuous,** making them less likely to be used. Road closure provides the missing link in the trail system, making the entire system more usable. Third, some have suggested that the Park Service address the need for better non-motorized access to these areas by simply building a trail in the areas affected by the proposed closures. That course is prohibited, in our view, by the steep, narrow topography of the Rock Creek gorge. Trail construction, if it were possible, would do immense damage to the environment and would obliterate scenic views that the Park was established to protect. **To connect the trails, closure of the three segments of Beach Drive to auto traffic, as envisioned by Alternatives C or D, is the only environmentally acceptable and practical solution.**

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By closing these sections, Alternative D will create an unbroken paved path from Memorial Bridge to the Maryland line, linking the Park to an expanding regional network of paved trails that local authorities and the Park Service have spent tens of millions of dollars developing. Currently, these trails run from Mount Vernon to Lake Needwood, via the Park, except for the missing sections; from Georgetown to Rosemary Hills via Bethesda; and from Key Bridge to Purcellville, VA. Planned trails will connect the existing network to Silver Spring, Takoma Park, Brookland and Capitol Hill, as well as the Anacostia waterfront. Closure of Beach Drive also connects the two ends of the Capital Crescent/Georgetown Branch Trail, forming a 21-mile loop that is virtually car-free, expanding the possibilities for recreational visits to the Park.

The Park Service plan to establish a Visitor Center on Beach Drive, at the current Park Police station, will help draw many pedestrians, school groups, and tourists to the heart of the Park for the first time, and will improve the experience of current users. This refocusing of the Park's resources will make Beach Drive more like a park, and less like a road – a vast improvement in the eyes of PARC's recreational and environmental supporters. **If the sections of Beach Drive affected by Alternative D were left open to auto traffic at all times on weekdays, the investment in a Visitor Center would be largely wasted.** The Park's visitors on weekdays would continue to be auto commuters, unlikely to stop.

Besides closing the three sections of Beach Drive for six hours a day, **it is also important that the Park Service undertake the traffic calming and enforcement measures that it proposes** as part of Alternative D (page 100), which the draft plan says "would hold traffic speeds to the posted limit." According to the traffic study performed during the planning process by Robert Peccia and Associates (page 4-16), 99% of the cars on Beach Drive exceeded the speed limit west of West Beach Drive, and 100% of cars exceeded the speed limit on Beach Drive south of the police substation. Depending on the time of day, as many as 63% of the cars exceeded 35 miles per hour, i.e., at least 10 mph over the limit. These speeds are a key factor in making this road unsafe and discouraging its use by bicyclists, despite the fact that the road is designated a bicycle route. Experienced cyclists can easily travel 15-20 miles per hour. Therefore, holding traffic speeds to the posted limit would go a long way toward improving safety when the road is open to cars. We particularly support the use of speed cameras for continuous enforcement, and traffic calming such as speed humps. Both measures, as proposed in the draft plan (page 100), would control speeds at low cost without the need for police presence.

**2. Other Issues Raised by the General Management Plan.** The General Management Plan performs an important service by focusing on traffic issues, but unfortunately, the focus on traffic has kept most observers from discussing other issues facing the Park and its users. If the GMP is to guide management of the Park for the next 20 years, it needs to address these issues as well. This section discusses six such issues: a) improvements to the existing paved trail; b) pedestrian access from the east side of the park; c) evening and nighttime hours; d) improving management of the Park's living resources; e) safety improvements at Wise Road; and f) the relocation of administrative and police facilities.

**a. Improvements to the Existing Paved Trail.** PARC supports NPS's intention to upgrade 5.3 miles of the paved trail that parallels Rock Creek. The trail has suffered neglect in recent years and has fallen into disrepair. Some trail sections flood regularly and become

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silt-covered because of poor drainage. Several sections are badly in need of re-paving and should be widened where possible. In other places the trail is so steep and has such poor sight lines that it is hazardous, particularly to inexperienced users.

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

NPS's proposal to arrange for 24-hour access through the National Zoo would also be welcomed by trail users, who are currently forced to travel through the tunnel after zoo closing hours. In addition to these proposed trail improvements, PARC urges NPS to restore the trail's water fountains.

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

**c. Evening and Nighttime Hours.** Alternative D as was inspired by a request from D.C. Mayor Anthony A. Williams that the Park Service explore the possibility of weekday recreation zones during the "non-rush-hour" period. Since the non-rush-hour period comprises about 18 hours per day, many recreationists and environmentalists were dismayed when NPS interpreted the Mayor's request to include only 6 midday hours.

Alternative D, as currently designed, needlessly forecloses evening recreational opportunities which could be very popular during the long days of late spring and early summer. Furthermore, leaving Beach Drive open to motor vehicles during hours of darkness provides no benefits in terms of commuting or scenic driving. But the cost of allowing nighttime traffic is likely very substantial in terms of damage to wildlife.

At the least, NPS should extend the weekend hours by keeping the gates closed on Friday and Sunday nights. That would expand recreational opportunities and give the wildlife a break for three nights per week instead of just one, at no additional administrative cost to the Park Service.

**d. Improving Management of the Park's Living Resources.** The draft General Management Plan does not discuss management of the Park's wildlife in great detail, but as one looks toward the next 20 years, the Park has major opportunities that it should seize to improve management of its living resources. Construction of a fish bypass at the Peirce Mill dam would expand habitat for blueback herring, American eel, and alewife, important

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species for the health of Chesapeake Bay. This project has been in planning for many years. It should be undertaken as soon as possible.

Deer in the Park are rapidly becoming a nuisance species, devastating ground vegetation that is important for migrating and nesting birds and small mammals. Some method of controlling deer populations needs to be considered.

The draft General Management Plan provides an informal count of 1,223 roadkill recorded in and adjacent to the Park over the decade 1991-2000, and concedes that actual road kill is probably higher. Between one-quarter and one-third of this roadkill occurs on Beach Drive, according to the plan (p. 132). Included in this total are numerous box turtles and black rat snakes (p. 134); both species appear to be declining in the Park. Closing Beach Drive to auto traffic would reduce roadkill and help protect these species.

*e. Safety Improvements at Wise Road.* Another concern that the GMP does not appear to address is the existing traffic hazard for weekend recreational users in between the two northernmost Beach Drive recreation zones. For a few hundred yards, recreational users must share the roadway with motor vehicle traffic crossing the Park on Wise Road. On weekends, this short section of Beach Drive is often covered with both cars and recreational users -- including families with small children -- sharing this hazardous roadway with no separation. Because this section of Beach Drive includes turn lanes, it is wide enough to provide for a dedicated bike/pedestrian lane on the west side of the road, if properly reconstructed.

*f. Relocation of Administrative and Police Facilities.* We applaud the Park Service for its plan to expand visitor services on Beach Drive and to move administrative offices out of Klinge Mansion. But the plan is vague regarding where the Park Police substation and the Park administrative offices are to be relocated. The Park Service should commit in the final document to build no new facilities in the Park for these purposes that would cause removal of mature trees, increase impervious surfaces, or otherwise degrade the Park's natural features.

**3. Issues Raised by Opponents of Alternative D.** As noted earlier, we believe that better protection of the Park's resources and expanded recreational access (as proposed in Alternative D) are supported by the vast majority of Park users who actually get out of their cars. But many people don't get out of their cars. For them, potential impacts on traffic are the main issue. To many of these people, Alternative D would close "a major north-south artery," causing intolerable amounts of spillover traffic on surrounding streets, and eliminating shortcuts to various destinations.

In fact, as the Park Service understands, the northern section of Beach Drive is not a major artery: it's a narrow, winding, two-lane road, with 9 blind curves in one 1.5 mile stretch and a speed limit of 25 miles per hour. Four major parallel routes for autos (16<sup>th</sup> Street, Georgia Avenue, Connecticut Avenue, and Wisconsin Avenue) as well as several minor routes (Oregon Avenue, Ross Drive, Glover Road, and Broad Branch to name a few) also serve as alternatives, and Metro's red line parallels the Park on both the east and west. **It is hard to imagine a situation in which more alternatives to driving on a given road**

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**exist. The few people traveling on Beach Drive during the mid-day period can be diverted to these alternatives, avoiding local neighborhood streets entirely.**

In addition, as the draft plan notes, every east-west route across the Park would remain open to cars under the proposal, so the use of the Park as a shortcut to other destinations would largely continue. Road signs and traffic calming can help if problems emerge, but based on traffic studies and experience elsewhere, problems appear unlikely.

Of course, one segment of those driving on Beach Drive -- perhaps a major segment -- doesn't want an alternative. For them, driving on Beach Drive is the objective, just as recreating on Beach Drive is the objective for many of PARC's supporters. It is here that **Alternative D commends itself over the other alternatives. It adds recreational access to the road, without eliminating access for motorists. As proposed, motorists would still have 18 hours a day to drive on the affected sections of the road.**

We would argue that this is more than enough. In fact, we supported Mayor Anthony Williams' proposal that the Park Service close the three segments during *all non-rush hour periods* on a trial basis, meaning that motorists would have weekday access 5 or 6 hours a day, with the road being closed to motor vehicles at all other times. We continue to believe that such an approach would provide superior environmental protection and additional recreational access without causing traffic problems. Our support for Alternative D reflects our judgment that it comes closest to this earlier position, but **we hope that the Park Service will be able to test additional modifications such as the Mayor's proposal without the need to undertake a full-blown General Management Plan again.**

Other issues raised by opponents of Alternative D include emergency access -- including the road's potential use as an evacuation route -- and access by seniors and the disabled. We think these issues are without merit. Beach Drive was not designated an evacuation route in the city's recently completed emergency plan. In any event, the temporary barriers closing the road could be circumvented or removed in seconds, should the need arise.

Similarly, **closing portions of Beach Drive would not restrict the access of senior citizens and the disabled to the Park. It would improve it.** When closed to auto traffic, this road is ideal for seniors or the mobility impaired -- a flat, smooth surface immediately next to Rock Creek. With no hills to climb, no curbs to overcome, and no traffic to worry about, seniors and the disabled would have a chance to experience the woods, hear the sounds of the birds and the rushing creek, and see trees budding or fall colors at their leisure. The alternative offered by opponents is a 3-minute drive through the gorge at 25 miles per hour (or more likely, at 35-40 mph).

The arguments raised by opponents have convinced many neighborhood groups and the D.C. and Montgomery County Councils to approve resolutions opposing any alternative other than the current management of the road. This should not come as a surprise. As Ernie Brooks, Chair of the Coalition for the Capital Crescent Trail, noted at one of the NPS public hearings, neighborhood associations typically oppose change. When the Capital Crescent Trail was being planned, not a single neighborhood group supported it. Some even opposed access from their neighborhoods to the trail after it was completed -- in one case a condo association went so far as to build a fence with barbed wire between their property and the

- 7 -

trail, although they later added a gate and ramp when it became apparent that the trail was actually popular with their members.

Unlike the National Park Service, many of these groups have allowed no public input before taking a position. By contrast, we commend you for conducting an open process in which arguments for and against your proposal were given a full hearing. **We urge you to weigh the merit and factual basis of the comments you receive as you conclude your analysis and choose an alternative for implementation.**

**4. Technical Issues. The analysis of traffic impacts, as shown on pp. 263-264 of the draft GMP, appears to us to have exaggerated the impacts of Alternative D (and, most likely, the other alternatives) in 2020.** Given the weight placed on traffic impacts in this debate, it is important that this element of your analysis be correct.

The primary problem appears to be calculations of traffic diverted from Beach Drive along the segment from Joyce Road to Broad Branch Road. Table 28 predicts that under Alternative D, a maximum of 970 vehicles per hour would be diverted in the midday period relative to Alternative B in 2020. Based on Table 29, these vehicles would presumably be diverted to Connecticut Ave., Wisconsin Ave., 16<sup>th</sup> Street, Georgia Ave., and Broad Branch Road. (The other routes listed in Table 29 all feed into one of these, so adding their totals would presumably double count diverted traffic.) Summing the vehicles on these diverted routes for Table 29 totals 1,840 vehicles per hour, much more than the 970 vehicles per hour available to be diverted. Table 29 also fails to allocate any of the diverted traffic to Ross Drive and Glover Road, further exaggerating the potential impacts on streets outside the Park.

The predicted traffic diverted to Broad Branch Road and Blagden Avenue are potentially the biggest traffic impacts associated with Alternative D. The draft GMP concludes (following Table 29 on p. 264) that "traffic volumes would more than double" on these two roads. Here, too, the number diverted exceeds the amount available to be diverted. Since both of these roads are described as being very sensitive to small changes in traffic, this seems to be an important inconsistency.

Several other elements of the analysis appear to be flawed:

- a) Beach Drive, from Joyce Road to Broad Branch Road, is expected to have 970 vehicles per hour at the midday peak. This is larger than the projected AM rush hour peak of 800 cars shown in Table G.2.
- b) Beach Drive, from Blagden Avenue to Rock Creek Parkway is projected to have 3000 vehicles per hour at the midday peak. This is larger than projections of both the AM and PM rush hour peaks shown in Table G.2.
- c) In all cases, the analysis projects 8.3% of Average Daily Traffic for the midday peak; 5% would be more typical, according to PARC's transportation consultants at ICF Consulting. Use of 8.3% leads to projected volumes during midday periods that are above the AM rush hour peak and close to or above the PM rush hour peak in all cases along Beach

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Drive. (ICF's critique of the GMP's traffic analysis was provided to Patrick Gregerson of NPS by e-mail on May 23, 2003.)

- d) The projected midday peak in traffic on Beach Drive occurs between 10:00 AM and 11:00 AM, according to the draft GMP (page 263). This assumption is in striking contrast to the actual traffic counts reported by Robert Peccia and Associates in their traffic study for the Park Service. In discussing hourly traffic variation, the Peccia study concluded that traffic counts between 10:00 AM and 11:00 AM were lower than those for any hour between 7:00 AM and 8:00 PM (Peccia, page 4-6).

PARC believes that **some of the public opposition to Alternative D may be attributed to overstated traffic impacts in the draft GMP.** We urge the Park Service to carefully examine its traffic analysis and revise its conclusions where appropriate.

**5. Testing Alternatives and Providing Flexibility. Given the uncertainties in the traffic modeling and the concerns expressed by opponents of any change in traffic patterns, PARC (and D.C. Mayor Anthony Williams) had earlier suggested that the Park Service test weekday non-rush hour closure of Beach Drive before implementing it on a permanent basis. This would allow actual measurement of before and after traffic impacts, and would allow the analysis of additional variations if negative impacts on surrounding neighborhoods were found to occur.**

The draft plan notes on page 95 that "the actual closure configuration [of Alternative D] may be adjusted." Given the length of time that the General Management Planning process has taken and the contentiousness that the process seems to have generated, PARC supports the need for operational flexibility in implementing Alternative D.

In particular, as part of any adjustments to be considered for future implementation, we believe that additional time periods should be considered for closure of the affected segments, beginning with an expansion of the weekend closures to encompass 7:00 PM Friday to 7:00 AM Monday, and ultimately encompassing, as Mayor Williams' letter suggested, all non-rush hour periods.

The key point is flexibility. It should not require 7 years of analysis and countless hours of input from interested parties to make adjustments to the closure configuration.

**Conclusion.** In general, PARC commends the Park Service for its efforts to restore balance in Rock Creek Park, to lessen the impact of auto traffic, to improve recreational opportunities, to protect the Park's historic resources, to expand interpretation and educational opportunities, and to improve the safety of Park visitors. We will continue to support such efforts as the National Park Service implements the proposals outlined in the draft plan.

Alternative D is a modest proposal. The fears raised by opponents (of traffic spillover, of emergency access, of difficult access for seniors and the handicapped) are unfounded. Many of these arguments were made against weekend recreation zones in 1980. **Parks in many other cities, including, New York, Brooklyn, Atlanta, Baltimore, and Los Angeles have closed park roads to traffic on weekdays with great success.** There is every reason to

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believe that weekday closure of Beach Drive, as envisioned by Alternative D, would also be successful.

PARC urges the National Park Service to stand behind its vision of what Rock Creek Park can be, and not to give in to the emotional arguments of opponents. Had NPS bowed to these arguments in 1980, we would have foreclosed the recreational mecca that Beach Drive represents today.

### **PEOPLE'S ALLIANCE FOR ROCK CREEK (PARC)**

African American Environmentalist Association  
 American Discovery Trail  
 American Hiking Society  
 Anacostia Watershed Society  
 Audubon Naturalist Society  
 Coalition for the Capital Crescent Trail  
 Center for Environment, Commerce, and Energy  
 College Park Area Bicycle Coalition  
 DC Bicycle Courier Association  
 DC Clean Air Network  
 DC Statehood Green Party  
 DC Velo Club  
 Friends of Meridian Hill  
 Friends of the Earth  
 Friends of the Northwest Branch  
 Friends of the W&OD  
 International In-line Skating Association  
 Montgomery County Outdoor Education Association  
 Metroped, Inc.  
 Montgomery County Road Runners Club  
 Potomac Pedalers Touring Club  
 Rails to Trails Conservancy  
 Reed-Cooke Neighborhood Association  
 Reston Bike Club  
 Sierra Club of Montgomery County  
 Sustainable Montgomery  
 The Potomac Conservancy  
 Trash Force  
 Virginia Bicycling Federation  
 Washington Area Bicyclist Association  
 Washington Area Rollerskaters  
 Washington Parks and People  
 Washington Regional Network for Liveable Communities

ROCR 1704  
Page 1 of 1ROCR 3090  
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Dear Superintendent Coleman,

I bicycle commute through Rock Creek Park. Frequently I am passed too close by motorists who are obviously exceeding the speed limit. I do not mind sharing the road with motorists who obey the law, but the current situation is dangerous. I am only mildly threatened by offenders who are speeding or passing too close, but this constant onslaught of many multiple violators is inexcusable. As a public safety measure you should immediately close the gates until you have implemented effective law enforcement technologies. Your preferred alternative does not go far enough considering the hazard to public safety.

Tim Bouquet  
Potomac Peddalers Touring Club  
DC Ride Coordinator

MR. YOURISH: Hi. Thank you for the opportunity to speak tonight. My name is Brian Yourish, Y-O-U-R-I-S-H. And I live in D.C. I am testifying tonight on behalf of Rails-to-Trails Conservancy, a national nonprofit organizations that advocates for the conversion of rail corridors into multi-use trails. The Capital Crescent Trail which runs from Georgetown to Montgomery County, Maryland is an example of that sort of facility.

Rails-to-Trails Conservancy supports the National Park Service's proposal to create weekday recreation zones along upper Beach Drive. This road is one of the greatest recreational resources in the District used by thousands of people on weekends. Expanding this opportunity to weekdays would enhance quality of life for people all over the Washington area.

Weekday recreation zones on Beach Drive would attract many kinds of people; seniors, students, families with small children, flex time workers, tourists and school groups could all take advantage of this spectacular recreational resource from 9:30 to 3:30 p.m. on weekends.

In addition, the Rock Creek Valley could become a living laboratory for local schools on weekdays facilitated by the improved pedestrian access from Beach Drive. In fact, the Park Service plans to enhance its educational program to take advantage of Rock Creek as a venue for school trips.

In the narrow gorge north of Broad Branch Road the Park Service has determined that there is no room for a trail. My experiences as a long distance runner has also shown me that the 5 miles or so between where the trail currently ends at Broad Branch Road and the Maryland border, there is no room for a trail. The creek is often directly next to the road and it is obvious from my experience that the terrain is very require the removal of a large quantity of the forest land to construct a trail through that area.

Due to that, the closing of this section of upper Beach Drive would help this area become part of the whole trail network of the area connecting to the Rock Creek bike path in Montgomery County, Maryland, which also connected with the Capital Crescent trail. Trail users heading south could use Beach Drive to connect with the paved bike path that exists just north of the zoo and go all the way down to the Mall.

It is the sentiment of Rails-to-Trails Conservancy of the shared use of scarce public resources is the appropriate public policy for the Park Service to pursue through its management plan.

**NEAL R. GROSS**  
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WASHINGTON, D.C. 20005-3701

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1

Douglas M. Duncan  
County Executive  
101 Monroe Street  
Rockville, Maryland 20850-2540

April 1, 2003

Re: Draft General Management Plan for Rock Creek Park proposing closures of Beach Drive affecting Montgomery County roads.

Dear Mr. Douglas,

The National Park Service has drafted a General Management Plan <http://www.nps.gov/rocr/> addressing various proposals to change the current management of Beach Drive. Any change that promotes closures of portions of Beach Drive will affect traffic patterns in our Montgomery County neighborhood. (Please see attached letter from Superintendent Coleman). Mr. Genetti, Director of the Department of Public Work and Transportation received a letter from Mr. Cochran, Director of Parks 6/21/01, see attached, concerning this matter. Mr. Genetti sent a letter to Rollingwood Citizen's Association, see attached, stating he was contacting the Director and was going to see what the proposed closures would be. I am following up since the hearings are now scheduled for May and written comments are due in July. What has the County done as far as determining the implications of these closures, Beach Drive, to community roads in Montgomery County? The Rollingwood Citizens Association is against any closures/HOV restrictions to Beach Drive, all the traffic coming off of Beach Drive will be forced in to our neighborhood roads, Pinehurst Parkway, Wyndale, Daniel, Leland, Woodbine. This problem already occurs on weekends and we have not received any help in dealing with these traffic issues from any jurisdiction (see attached letters). We already have restrictions during rush hour to prohibit cut through traffic. Any further closures of Beach Drive will increase cut through traffic and make our roads unsafe. We do not have sidewalks and our children use the roads to walk to the park and their school buses. We do not want to make walking in our neighborhood unsafe for our children. Additionally, Beach Drive is a community road for our neighborhood. We travel this road to go to work, church, grocery shopping and other daily activities. We would now have to take longer trips in addition to all the other cars that will have prolonged commutes due to restrictive use of Beach Drive, has an environmental impact study been done to determine the pollution due to additional time on the roads? What about security? How will the evacuation of the city be enhanced by closure of Beach Drive?

Please address the concerns of our community. It has been very difficult dealing with multiple jurisdictions and coordinating what jurisdiction is responsible to deal with this problem. The Rollingwood Citizen's Association is looking forward to a resolution to this situation.

Sincerely,

  
Ann N. Ford  
Rollingwood Citizen's Association

cc: Albert Genetti  
Donald Parks  
Adrienne Coleman  
John Adams Hurson  
Howard Denis  
Chris Van Hollen, Jr.

Ann Ford  
2710 Daniel Road  
Chevy Chase, MD 20815-3151

National Park Service, Rock Creek Park Superintendent

I am representing Rollingwood Citizen's Association in Montgomery County, Maryland. Our community borders Beach Drive north of the District.

The Draft Management Plan for Rock Creek Park has been reviewed by the Association, which is against Alternatives A, C and D. Alternative B, to continue current management/no action, is supported by the Association.

There are four reasons for our objection to A, C and D.

First is safety. With any closure or restrictive use (HOV) of the northern sections of Beach Drive our community will experience a significant increase in traffic. For the many children of this community who walk to their schools, school buses, and park, this is a very dangerous situation. The ability to walk safely in our neighborhood during the day will be at risk.

The second objection is the ability of our community to carry out its daily living activities. Beach Drive is considered a neighborhood road to our community. At all hours of the day we travel to work, go grocery shopping, and do errands using Beach Drive. The ability to perform these tasks in our neighborhood will be unfairly inhibited by alternatives A, C and D.

The third objection is the impact on the environment. There would be additional commuting time for cars that would normally be taking Beach Drive, producing more pollution.

The fourth objection is that the general management plan does not address solutions to the fall out traffic problems of communities surrounding Rock Creek Park. The northern portions of Beach Drive are closed on the weekends to motorists, creating heavy traffic on residential roads. The Park service will not address this issue because these roads are not in the Park's jurisdiction. Again the National Park Service is making unreasonable policies that adversely affect the Park's surrounding communities, and is taking no responsibility for the consequences of these policies.

ROCR 0608  
Page 2 of 2

Over the years, Beach Drive has become an essential road in commuting for the entire D.C. Metropolitan area. Prohibiting or restricting use will only create problems for the surrounding communities. With traffic constantly increasing in our area, closing down roads without supplying alternatives is not a justified solution.

Sincerely,  
Ann N. Ford  
Rollingwood Citizen's Association

ROCR 3040  
Page 1 of 2

MS. FORD: Hi, my name is Ann Ford. I'm representing Rolling Woods Citizens Association. I live in Chevy Chase, Maryland. The Rolling Woods Citizens Association represents the residents of 832 homes in Chevy Chase, Maryland bounded by Beach Drive, East-West Highway, Brookville Road, and Western Avenue. Our association strenuously opposes the proposal in the National Park Service draft management plan for Rock Creek Park to close portions of Beach Drive to vehicular traffic on weekdays from 9:30 a.m. to 3:30 p.m.

We respectfully request your support for the Association's position, and we hope we can count on your vigorous advocacy of your position with the National Park Service before the public comment period concludes on July 15. As a Rock Creek Park immediate neighbor, Rolling Wood residents have a special appreciation for the park as a wonderful resource and a neighborhood asset.

We also recognize the weekend closure of portions of the road provides recreational use for many. However, weekend closure combined with annual increase in D.C. traffic already impact Rolling Wood. Our neighborhood streets, particularly Daniel, Windale, Greenvale, Pinehurst Parkway, Woodbine, Leland, and Brookville Road, already experience cut through vehicles searching for alternative routes from Beach Drive when it is closed or crowded. Any additional closure to Beach Drive will result in significant, dangerous, and unacceptable increases in traffic through Rolling Wood.

None of our neighborhood streets have sidewalks. A significant traffic increase will further threaten pedestrian safety in our neighborhood. Additionally, more cars traveling, stopping, and starting throughout our neighborhood will add exhaust emissions adversely impacting our environment. Moreover, at the time of concern over evacuation routes to smoothly move thousands of people out of D.C., it seems inconsistent that a plan to close a significant evacuation route is receiving serious consideration.

Clearly the weekday Beach Drive closure will have only minimal recreation benefits. The plan provides for no study or solutions to the fall out traffic problems created for Rolling Wood and the surrounding communities. We assert that this closure would create major problems for our neighborhood.

The plan is therefore ill-conceived. It applies only minimal benefit in exchange for a major detriment to our community.



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Page 2 of 2

ROCR 2999  
Page 1 of 5

The current transportation management plan has worked successfully for many years. Balancing recreational and other community interests on behalf of the 830 homes in Rolling Woods Community, we strongly urge you to join us in opposing any change to the present weekend-only closure of portions of Beach Drive. We deeply appreciate your careful review of this matter and look forward to hearing from you soon. Thank you for your anticipated support.

I have more time. Additionally, I would like to address the specific deficiencies in the plan. The first deficiency is the plan lacks analysis of traffic impact on neighborhood roads. A proposition that the rerouted traffic does not impact neighborhood roads is without basis. The plan states that the NPS did not study neighborhood roads, page 346.

Another deficiency is assumes traffic will be rerouted to Connecticut Avenue. Due to the park closure on weekends, traffic is currently rerouted to neighborhood roads. Why would this change during the week? Another deficiency is uncertain benefit. Between the hours of 9:30 a.m. and 3:30 p.m., who will use this park? The study does not address levels of service during this time. During the winter months, the closed section of Beach Drive has a very low level of service. In the Montgomery County portion of the park, the bike paths experienced low utilization during the mid-day portion of the weekdays. A survey conducted by the NPS indicates 68 percent of the cyclist prefer bike paths over the road.

Another deficiency is plan acknowledges its model cannot accurately predict shifts in transportation modes. This shortcoming casts doubts on NPS' dubious assertion that road closure will result in a surge in cyclist commuting. Another deficiency is no cost benefit analysis undertaken by NPS. No cost benefit analysis was performed by the NPS of adverse impacts on neighborhoods surrounding the park which are an increased rate of pollution, increased gas use by diverted vehicles, need for the community to put traffic calming measures. Thank you.

#### NEAL R. GROSS

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WASHINGTON, D.C. 20005-3701



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Rollingwood Citizens Association  
Chevy Chase, MD 20815-3134  
www.rollingwood.cc

20 May, 2003

The Honorable Barbara A. Mikulski  
The Honorable Paul Sarbanes  
The Honorable Christopher Van Hollen  
The Honorable Douglas Duncan  
The Honorable Howard Denis

The Rollingwood Citizens Association (RCA) represents the residents of 832 homes in Chevy Chase, Maryland, bounded by Beach Drive, East-West Highway, Brookville Road and Western Avenue.

Our Association strenuously opposes the proposals in the National Park Service's Draft General Management Plan (the "Plan") for Rock Creek Park to close portions of Beach Drive to vehicular traffic on weekdays from 9:30 AM to 3:30 PM.

We respectfully request your support for the Association's position and hope we can count on your vigorous advocacy of our position with the National Park Service before the public comment period concludes on July 15<sup>th</sup>.

As Rock Creek Park's immediate neighbor, Rollingwood residents have a special appreciation for the Park as a wonderful resource and a neighborhood asset. We also recognize that weekend closure of a portion of the road provides recreational use for many.

However, weekend closure combined with annual increases in DC traffic already impact Rollingwood. Our neighborhood streets, particularly Daniel, Wyndale, Greenvale, Pinehurst Parkway, Woodbine, Leland and Brookville Road already experience "cut through" vehicles searching for alternate routes from Beach Drive when it is closed or crowded. Any additional closure to Beach Drive will result in significant, dangerous and unacceptable increases in traffic through Rollingwood.

None of our neighborhood streets have sidewalks. A significant traffic increase will further threaten pedestrian safety in our neighborhood. Additionally, more cars traveling, stopping and starting throughout our neighborhood will add exhaust emissions, adversely impacting our environment.

Moreover, at a time of concern over evacuation routes to smoothly move thousands of people out of DC, it seems incongruous that a plan to close this significant evacuation route is receiving serious consideration.

ROCR 2999  
Page 2 of 5

Clearly, this weekday Beach Drive closure will have only minimal recreational benefits. The Plan provides for no study of or solutions to the fall-out traffic problems created for Rollingwood and the surrounding communities. We assert that this closure will create major problems for our neighborhood. The Plan is, therefore, ill-conceived: It provides only minimal benefit in exchange for major detriment to our community.

The current transportation management plan has worked successfully for many years, balancing recreational and other community interests. On behalf of the 832 homes in the Rollingwood community, we strongly urge you to join us in opposing any change to the present weekend-only closure of portions of Beach Drive.

We deeply appreciate your careful review of this matter and look forward to hearing from you soon. Thank you for your anticipated support.

Sincerely,

s/ Gabriele Gandal

Gabriele Gandal, President  
Rollingwood Citizens Association

CC: Superintendent  
Rock Creek Park Headquarters  
3545 Williamsburg Lane, NW  
Washington, D.C. 20008

ROCR 2999  
Page 3 of 5

## Concerns About Proposed Closure of Beach Drive FACT SHEET

**Issue: There has been no substantive analysis of the impact of traffic on neighborhood streets.**

- Plan states that NPS did not study neighbor streets.
- No basis for the assertion that rerouted traffic does not impact neighborhood streets. (Plan document pg. 347)

**Issue: Assumption that traffic will be rerouted to Connecticut Avenue.**

- Due to the Park closure on weekends, traffic is currently rerouted to neighborhood roads that feed into Connecticut Avenue.
- Connecticut Avenue is already overcrowded and overutilized, making it an unlikely and impractical alternative to Beach Drive.

**Issue: Inadequate study of benefits of closure.**

- There are no data in the plan to substantiate that there will be increased use of the park between the hours of 9:30am-3:30pm
- During the winter months the closed section of Beach Drive is under utilized.
- In the Montgomery County portion of the Park the bike and walking trails are used very little during the hours of 9:30-3:30 on weekdays, the proposed times for closure.e .

**Issue: Current alternatives offered by NPS are deficient.**

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

**Issue: NPS has not involved other impacted government entities in its planning.**

- The District of Columbia and Montgomery County Councils have passed formal resolutions emphasizing the importance of Beach drive and the Rock Creek and Potomac Parkway to the local and regional transportation system.
- The Councils and the Maryland Department of Transportation, the District of Columbia Department of Public Works have urged NPS that the corridors have no new motor vehicle restrictions because of the potential adverse effects on the heavily burdened regional street grid. This position is supported by all of the above.
- Several neighborhood organizations, and many individuals commented during scoping that they oppose the alternatives for similar reasons. (NPS p. 62)

**Issue: NPS failed to perform environmental impact studies on neighborhoods surrounding the park.**

- The NPS Plan contains numerous assertions that there are no major differences in the environmental impact among the 4 alternatives including Alternative B, maintaining the status quo.
- Surrounding neighborhoods will have increased emissions due to greater volumes of stop and go traffic

**Issue: No analysis has been done to assess accident and injury and fatality rates that may result from diverting traffic onto neighborhood streets.**

- Pedestrian/cyclist injury rates are known to be higher on neighborhood roads than on major arteries such as Beach Drive and Rock Creek Parkway, yet NPS failed to consider the potential human cost and risks resulting from shifting traffic neighborhood streets.
- More than 50% of all pedestrian fatalities occur on neighborhood streets. According to the Mean Streets study, there is a 45% fatality rate for pedestrians in pedestrian/automobile collisions at a vehicle speed of 30 mph
- In 1999, Montgomery County documented the fact that vehicle speeds averaged 30 mph on Daniel Road, exceeding the posted speed limit, thereby causing great risk to pedestrians.
- There has been low incidence of pedestrian/cyclist injury and fatality in the Park. For the three-year study period undertaken at the direction of NPS, the fatality rate for Beach Drive was 0.3% -- representing one fatality involving an automobile colliding with a stationary object.
- 10 of 17 pedestrian/cyclist accidents involving motor vehicles on Beach Drive and four roads in the northern section of the Park occurred on WEEKENDS on "closed-off " road segments, the very same segments that NPS proposes to close on weekdays. (p. 149)

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(b) (5) DPP, (b) (5) ACP

5/29/03

Honorable Paul Sarbanes  
309 Hart Senate Office Building  
Washington, D.C. 20510

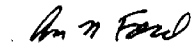
Re: General Management Plan for Rock Creek Park

Dear Honorable Paul Sarbanes,

I am writing in reference to Rollingwood Citizens Associations' concerns of a Draft Management Plan for Rock Creek Park. The National Park Service (NPS) has developed and ill-conceived and severely deficient proposal to close Beach Drive in Rock Creek Park to workday traffic. NPS has failed in its obligation to study the potential impact and presumed benefits of this proposed action, which, if implemented, would divert massive amounts of new traffic into communities surrounding the Park. Because of this failure to carefully and thoughtfully evaluate the impact of the NPS proposal, it should be rejected in its entirety. I have included documented evidence that the NPS did not do their job (see attachments). In addition contradictory information in the General Management Plan (see attachment pg 34) indicates the NPS looked at building a bike path in certain park areas but did not consider this because of low usage of the path during the week, but the NPS wants to close roads in the same areas to accommodate bikers during that same time period. This does not make sense.

We would appreciate your support in reviewing this matter and look forward to hearing from you. Thank you for your anticipated support.

Sincerely,



Ann N. Ford  
Rollingwood Citizens Association

atord343@yahoo.com

#### PROPOSED CLOSURE OF BEACH DRIVE: THE FACTS AND RECOMMENDATIONS

*The National Park Service (NPS) has developed an ill-conceived and severely deficient proposal to close Beach Drive in Rock Creek Park to workday traffic. NPS has failed in its obligation to study the potential impact and presumed benefits of this proposed action, which, if implemented, would divert massive amounts of new traffic into the communities surrounding the Park. Because of this failure to carefully and thoughtfully evaluate the impact of the NPS proposal, it should be rejected in its entirety.*

#### National Park Service Proposal – An Overview

- The National Park Service has developed a management plan for Rock Creek Park, which includes four alternative proposals to enhance recreational facilities, improve visitor education, and relocate administrative facilities.
- All but one alternative in the NPS plan includes limiting traffic on Beach Drive.
- Closing Beach Drive is the cornerstone of "Alternative D" in the management plan. Of the four alternatives under consideration, Alternative D has been identified by the Park as its "preferred alternative." It involves closing three sections of Beach drive to traffic on Monday through Friday, from 9:30 a.m. to 3:30 p.m. These sections are currently closed to traffic on weekends and holidays.
- The Park believes that this alternative would enhance workday recreational opportunities while permitting access for rush hour traffic before 9:30 and after 3:30.
- The draft Environmental Impact Statement (EIS) determined that there would be insignificant environmental benefits associated with any of the alternatives studied, including maintaining the status quo.
- The public comment period on the Park's plan concludes July 15<sup>th</sup>, with a final decision to be published in the Federal Register several months later.

#### Inadequate Traffic Studies and Failed NEPA Analysis

- NPS has an absolute legal obligation under the National Environmental Policy Act (NEPA) to evaluate the impact of its proposal, yet numerous findings demonstrate that it has failed to meet these obligations required by NEPA.
- While an estimated approximately seven cars per minute use upper Beach Drive during the workday, the Park has failed to model cut-through traffic impacts on residential neighborhood roads. The draft EIS dismisses the potential for massive cut-through traffic in neighborhoods, but there are no data to substantiate this assertion.
- The draft EIS fails to evaluate weekday traffic volumes for Alternative D, the Park's "preferred alternative." (Page 337)
- The EIS uses traffic data collected in 1990 to assess traffic impacts, but this model is faulty as it is designed to evaluate regional traffic issues rather than impacts on corridors or neighborhoods. While the NPS attempted to make adjustments to improve its modeling, expert testimony presented at the May 22 hearing refuted the model's validity.

- Neighborhoods already experience significant cut-through traffic on weekends when Beach Drive is closed. Despite this actuality, the EIS makes the erroneous assumption that workday traffic will instead choose major corridors such as Connecticut Avenue and 16<sup>th</sup> Street. These corridors, already overburdened with traffic, will be poor alternatives for those seeking an efficient route downtown.
- According to AAA, rush hour is not limited to hours before 9:30 a.m. and after 3:30 p.m. Projections indicate that future rush hours will expand well into the 9:30-3:30 hours.
- The NPS has not performed a detailed analysis of the extent to which closing Beach Drive during these workday hours would enhance recreational opportunities and actual use of the park.

**Safety Issues**

- Residential streets are not designed to handle massive cut-through traffic, as they are often winding, without sidewalks, populated by many children, and used by school buses
- More than 50% of all pedestrian fatalities occur on neighborhood streets. Increasing traffic on these streets will result in a great risk of accidents involving both children and adults. In contrast, there has only been one documented accident in the park.
- In 1999, Montgomery County found that vehicle speeds on Daniel Road – a major cut-through – averaged 30 MPH. There is a 45% fatality rate at this speed.

**Growing Political Opposition**

- The NPS has failed to involve affected local governmental authorities. Officials and community organizations in every community surrounding the affected area have expressed deep concern and/or clear opposition to the road closure, including: DC Council members Schwartz and Fenty; Montgomery County Council; Maryland Department of Transportation; ANC 3F, 4A, 3C, Shepherd Park, Crestwood, Chevy Chase DC, Chevy Chase MD, Forest Hills, among others.

To: Gale Norton/SIO/OS/DOI@DOI  
cc: rocr\_superintendent@nps.gov

Subject: Draft Management Plan for Rock Creek Park

Dear Secretary Norton,

The National Park Service for Rock Creek Park has come up with a Draft Management Plan that is ill-conceived and a waste of our tax dollars. I want an investigation on the mismanagement of our tax dollars for this plan.

You state you are committed to 4 c's, cooperation, consultation, communication and conservation, has this been imparted to your employees? Our homeowner's association, Rollingwood Homeowner's Association has never been so mistreated by a government agency then by the NPS. We were never advised until the draft plan was completed that the preferred plan for Beach Drive was to close the road during the day. The Superintendent never contacted our homeowner's organization or other homeowner's associations to discuss the impact to our public safety. Do you know they violated NEPA by not performing a detailed statement when undertaking a major federal action that significantly impacts the quality of the human environment. The NPS did not perform one impact study on our neighborhood to determine if our public safety would be jeopardized by their plan. We feel this was done deliberately because they knew the results. I had the Maryland National Capital Park and Planning Commission perform the studies on our street and they found a significant cut through problem with the preferred alternative plan of the NPS. Why was this study not performed prior to the release of the NPS draft management plan? It is not like the Superintendent did not know of our concerns. I have written the Superintendent numerous times over the last 8 years to complain about the adverse impact from the weekend closure on our community without receiving any response other than it is not my jurisdiction or I will send extra patrols. We have yet to see these extra patrols.

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They are also violating the Rock Creek Enabling Act which established Rock Creek Park for these purposes, to be used for driving, for horseback riding and footways for pedestrians. NPS recognizes that driving by car in the Park is a traditional and fundamental purpose but its preferred alternative eliminates this use during the day. Also this road was legislated for the purpose of connecting the north and south parts of the Park with the Zoo. They want to do away with the Congressional intent of the Park.

Did you know the elderly, handicapped and mothers with small children can not use those areas of the park during the day because there is no access? This is the time of day when most of these individuals can use the Park.

The NPS was told in 1990 to put a bike path in and they declined based on a low user rate 20-35 user per hour. That rate has not significantly changed and in Montgomery County in that same area of Beach Drive there are about 24 users per hour and 250 cars per hour, but the NPS wants to close down a road for recreational use during the weekday when there is a 10 to 1 user rate. Do you know how I know this information? I had the studies done by the Maryland National Park and Planning Commission. The NPS did not even do the work they were supposed to do. The studies in the Draft Management Plan are over 13 years old, a traffic analyst who came to the hearings stated you can not use such old studies.

We have generated support against this closure from Chris Van Hollen, House of Representatives, DC City Council, numerous DC ANCs, numerous homeowner's association, Montgomery County Council will be deciding June 26,2003.

How did this happen? Why were the NEPA guidelines not followed? Why is the Rock Creek Park Enabling Act being ignored by the NPS? Thank you for taking the time to respond to my concerns. I look forward to hearing from you.

Sincerely,  
Ann N. Ford  
Traffic Committee, Rollingwood Citizen's Association  
Chevy Chase, Maryland 20815

MS. HOYTE: Good afternoon. My name is Joan Hoyte, Hoyte is spelled H-O-Y-T-E. I am the President of the Sheppard Park Citizens Association and my testimony today is on behalf of that Association.

The Sheppard Park Citizens Association joins ANC-4 and Ward 4 Council Member Fenti in opposing any and all changes in Rock Creek Park's management of the traffic plan. Instead, the Sheppard Park Citizens Association joins our ANC and Council Member Fenti in supporting alternative B for managing traffic through the parkway.

Rock Creek Parkway's Beach Drive is the western boundary of Sheppard Park. Residents of the Sheppard Park community rely on the accessibility of Beach Drive during their weekday commute to downtown and across town. In turn, an accessible Beach Drive helps to reduce the flow of traffic on the other northbound and eastbound roads that serve our community.

Speaking from my own family's experience on a daily basis we use the portion of Beach Drive that is targeted for closure twice daily to take our children across town. We traverse the park that way. Occasionally we also use other portions of Beach Drive to go downtown or across to Virginia.

If Beach Drive is closed, it will create a hardship for my family, as well as the other users from my community.

Mid-week closing of the portion of Beach Drive that is targeted would reduce the efficiency of our transportation system by forcing cars onto our already overburdened routes that run through Sheppard Park. For it is unlikely that if Beach Drive is closed, commuters who generally use that route will leave their cars at home and start using other means of transportation. Those who drive on Beach Drive to get to their downtown locations do so because it is a shorter route with less stop and go traffic. The closure of Beach Drive will necessarily leave them to use our already overburdened streets.

Apart from the crawling traffic that the closure of Beach Drive will create in our community, our neighborhood will suffer a resulting environmental pollution problem. On 16<sup>th</sup> Street, for example, rush hour traffic is a major source of pollution. Closing Beach Drive will add to that pollution overall in our neighborhood and throughout the city.

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As one of the most congested cities in this nation with an alarming air pollution problem, this city and this region cannot afford to close the valuable travel route of Beach Drive.

We do not believe that alternative D which permits vehicular traffic during rush hour, but closes Beach Drive from 9:30 a.m. to 3:30 p.m. will serve the commuting and recreational needs of our residents. A large percentage of the Sheppard Park citizenry are senior citizens and families with young children, many of whom use the park for recreational purposes not only on weekends, but also during the week. Alternative B would deny the use of the portion of Beach Drive which leads to the picnic areas in the park for those citizens who cannot get there but by their own car. If the objective for closing Beach Drive to automobile traffic is to make it safer for recreational users, the objective may not necessarily be achieved. Many Sheppard Park residents who have used Rock Creek Parkway for recreational purposes during the week and days, and on holidays when the park is closed have encountered bikers who behave recklessly, flying around curves—excuse me.

Breaking speeds, often frequently missing bikers and pedestrians.

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MR. BROEHRM: Good evening. My name is Jason Broehm. Last name is spelled B-R-O-E-H-M. I live in Washington, D.C. I'm here this evening as elected leader of the Sierra Club.

The Washington D.C. Chapter of Sierra Club supports alternative C, as you heard earlier, which would be complete closure to automobiles of the three segments of Beach Drive currently closed to motor vehicles on weekends.

Now, as you heard earlier, Sierra Club has a long and distinguished history as a leading defender of parks and natural areas. The organization has been instrumental in the creation and preservation of many national parks and other natural treasures across the country.

We recognize that alternative D, which would close Beach Drive during midday non rush hour periods during the week would be progress over the status quo with Beach Drive being opened to cars all day five days a week. However, we would be remiss if we failed to point out the deficiencies of alternative D.

Rock Creek Park was created in 1890 to preserve park resources "in their natural condition as nearly as possible." In recent years as we know, though, Beach Drive has become little more than a commuter highway with car after car speeding through the park. Five days each week the park is inundated with cars and clogged with traffic, particularly during rush hour. Only once have I ridden a bicycle on Beach Drive during rush hour, and I'm not sure whether it was out of curiosity, braver or stupidity, but I haven't ventured back there since during rush hour. It's a hostile environment. It's an unsafe environment. You have a narrow road with a steady stream of cars speeding through—actually intermediately speeding and stopped and backed up for a considerable distance at the many stop signs along the way.

By failing to address the rush hour traffic alternative D would leave a large part of the park's traffic problems unaddressed, thereby excluding recreational users when they would be most likely to use Beach Drive, either before or after work which coincide with rush hour, unfortunately.

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On Tuesday and again tonight I've listened to a number of people who oppose alternative D, which is really a compromise position to begin with. I heard these people argue against any changes whatsoever in the management of Beach Drive, essentially alternative B. They oppose even reasonable changes and quite minimal ones at that, I might add. Such as implementing traffic calming measures, enforcing speed limits and instituting high occupancy vehicle requirements of two or more people during rush hour. I even heard some people on Tuesday express regret that Beach Drive is closed on weekends when far fewer cars are the road. This is really disturbing. It's troubling.

Why not at least support alternative A if you have some objections to closure that would at least control some of the traffic problems. Sadly I think this reflects the suburban mentality that is ruining the quality of life in the Washington, D.C. region. Seventy percent of D.C. commuters drive to work alone, that's one person per car. This is the single largest contributor to D.C.'s horrendous air quality problems.

We're in severe nonattainment category for ozone air pollution. Each summer we face too many code red days and last summer we even discovered that there's a worse air quality category which is code purple.

We need to shift our thinking towards alternatives towards transit, carpooling, biking.

As we have many times before, Sierra Club must take a principled stand for the protection of Rock Creek Park as with other parks. It really is a valuable national park and valuable recreational resource and we should be able to enjoy the park for recreation 24 hours a day, 7 days a week. We ask that you go further than alternative D. Please if it's C.

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MR. DOUGHERTY: Good evening. My name is Jim Dougherty. I live in Southwest Washington in Ward Six. I'm too far away to have a personal interest in this matter. I speak tonight on behalf of the 3,000 District residents who are dues paying members of the Sierra Club.

The Sierra Club is opposed to the proposed Alternative D on the grounds that it doesn't go far enough. We think the Park Service is pulling its punches here. We would like to see stronger steps taken to protect the wildlife, the ecosystem, and those park users who go there to enjoy the park as opposed to using it for driving to work.

First, I would like to make a background comment. The Sierra Club has been in the business of advocating conservation of the park system for a long time, longer in fact than you folks have. It was our president John Muir who took President Roosevelt into Yosemite in the 19<sup>th</sup> Century, a meeting which led to the creation of that park, a couple of decades before the Park Service itself was founded.

Over the centuries and in parks throughout the country, we have supported the Park Service's difficult effort to try and balance the competing demands that are placed on the park system. Those demands are protecting the resource, protecting recreationalists, and to some extent accommodating transportation needs. What we see is that with increasing urbanization, increasing population, increasing SUVs, increasing demand for driving through our parks, what the Park Service has done in response is to restrict automotive use.

In Yosemite Valley, for example, they are now executing a plan to keep the cars out. Naturally that's engendering some opposition, but the Park Service has come to the conclusion that's the right thing for the resource and the people. We think the same approach is appropriate here in Rock Creek Park. Rock Creek Park faces all of the threats of the other parks plus a lot more. They have encroachments. They have more people. They have more pollution.



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The time has come to take a step forward to protect the recreationalists. When it was proposed 20 years ago to close a few segments of Beach Drive on weekends, you saw the same kind of outrageous reaction that you are seeing now. People said oh my God, how can you do this, it's going to paralyze traffic in the city. What we learned of course was that was not the case.

In fact, what happened was for the first time people could get in there and really have a personal experience with the creek and with Boulder Bridge and with that great gorge and valley. So now you have had a couple of generations of Washingtonians who have really developed relations with the park. Now you have a lot more constituency support for the park and for its conservation.

We think you need to take it another step. We supported the proposal several years ago to extend the weekend plan to a weekday basis, in other words 24-7 you would close those few segments of Beach Drive. To our disappointment, Mayor Williams wrote a letter to the Park Service a couple of years ago saying why don't we leave the Beach Drive open for six hours a day for commuter traffic and close it for 18 hours a day. We saw that as a step back that we did not support.

We now see that in Alternative D the Park Service has proposed that the road be closed merely for six hours per day during the week. So it's a compromise on a compromise. And in fact it's now been proposed as a test. We can't oppose a test because a test is merely collecting information. I don't see how any reasonable person or group could oppose a test. But we think where this should be headed is extend the weekend closures that have been so successful on weekends. Thank you.

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WASHINGTON, D.C. 20005-3701

MR. WENZLER. I am Mark Menzler. It's W-E-N-Z-L-E-R. I live D.C. I'm also Chair of the Washington D.C. Chapter of the Sierra Club. I'm here testifying on our behalf this evening.

Sierra Club is the nation's and the city's largest and most active grassroots environmental organization. We have over 3200 members in the city and over 17,000 members in the region.

Since it's founding in 1892 a fundamental mission of the Sierra Club has been to explore, enjoy and protect the wild places of the earth.

National parks have been the heart and soul of our nation since the world's first national park, Yellowstone, was created by an act of Congress in 1872 "for the benefit and enjoyment of the people in order to protect for all time this outstanding natural area." But it wasn't long after the establishment of a national park system that parks began to be threatened.

The Sierra Club's very first conservation campaign in 1892 sought to defeat a proposed reduction in the boundaries of California's Yosemite National Park. More recently, hundreds of thousands of Americans have spoken out against policies that threaten our national parks, forests and wilderness areas. For instance, people opposed proposals to drill for oil in the Arctic National Wildlife Refuge in Alaska, to reverse wilderness designations in the west and to log our old forests. But large western lands aren't the only ones threatened by ill-conceived policies. It seems that sometimes we overlook problems in our own backyard.

Rock Creek Park is the national park in our back yard. And for far too long we've ignored its unfortunate transformation from a wild and peaceful oasis to a major commuter thoroughfare.

In 1916 Congress established that the fundamental purpose of the parks is to conserve the scenery and the natural and historic objects and the wildlife therein, and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.

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That fundamental purpose has been seriously compromised by the massive weekend flow of commuter traffic through the park. The unbroken chain of autos during morning and evening rush hours impairs air quality, disturbs wildlife habitat, reduces the peaceful enjoyment of nearby hiking trails and severely restricts recreational opportunities on the roadways.

The Park Service says that Rock Creek Park offers visitors an opportunity to reflect and sooth their spirits through the beauty of nature. While this largely true on weekend days when upper Beach Drive is closed to autos, it is not true on weekdays when the park is overrun by cars.

The general management plan now being considered by the Park Service offers the best opportunity in our generation to begin to reverse the tragic degradation of Rock Creek Park by auto traffic. The one year test closure of upper Beach Drive to auto traffic during non rush hour proposed by the Park Service is a promising start.

However, the Sierra Club urges the Park Service to consider an all day closure, alternative C. Area residents who work typical 9:00 to 5:00 jobs will not be able to enjoy the car free time in the late morning and mid-afternoon under alternative D. In addition, the Park Service will not be able to test whether the permanent closure of upper Beach Drive will cause commuter problems outside the park.

While it's certainly possible that closing upper Beach Drive to commuter traffic could increase congestion on some area roads, natural parks were not created to solve traffic problems. That's the job of area transportation planners. Rock Creek Park will never achieve the fundamental purpose of a national park unless and until it ceases to be a commuter highway.

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July 14, 2003

Adrienne Coleman, Superintendent  
Rock Creek National Park  
National Park Service  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008-1207

RE: Comments on the *Rock Creek Park and the Rock Creek and Potomac Parkway Draft General Management Plan and Environmental Impact Statement*

Dear Superintendent Coleman:

On behalf of our more than 3,200 members in Washington, D.C., the Sierra Club Washington, D.C., Chapter submits the following comments in support of Alternative C, "Non-motorized Recreation Emphasis."

The Sierra Club has a long and distinguished history of fighting to create and protect our national parks and other precious natural areas for future generations to explore and enjoy. As Washingtonians, we are blessed to have Rock Creek National Park in our own backyard. As one of the oldest and largest forested urban parks in the country it is truly unique.

As you are well aware, Rock Creek National Park faces a number of unique challenges. It is hemmed in on all sides by urban development, and surrounding land uses can significantly affect the health of Rock Creek's entire ecosystem. About 70 percent of the Rock Creek watershed has been developed with impervious surfaces, which speeds polluted storm water runoff into the creek, causes flooding and stream bank erosion and harms aquatic life. In addition, Washington, D.C.'s antiquated combined sewer system dumps raw sewage directly into Rock Creek any time the city receives more than a modest rain, making portions of Rock Creek unsafe for aquatic life and human use. And in recent decades—in the absence of any conscious policy or management decision—the park has been transformed from a tranquil escape from the surrounding cityscape to a busy commuter thoroughfare.

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All of us who care about and love Rock Creek National Park as the place we all love, we have a tremendous amount of work ahead of us. The National Park Service's draft general management plan moves us in the right direction in the area of traffic management, but we can and should do better.

#### ***Close Portions of Beach Drive to Automobiles***

We are pleased that the National Park Service considers Alternative B, the status quo, to be unsatisfactory. (draft general management plan, p. 63). By selecting Alternative D as its preferred alternative, the National Park Service has taken an important first step toward controlling automobile traffic in the park. However, this alternative leaves the significant problem of weekday commuter traffic during the morning and evening rush hours almost completely unaddressed. Instead, we encourage the National Park Service to select Alternative C, the only alternative that would adequately address the growing problem of automobile traffic in Rock Creek National Park. This position is based in large part on the belief that the original purpose and mission of the park should be upheld even in the context of historical change.

In 1890, when Congress established Rock Creek National Park as a pleasure ground for the American people it directed park managers to "provide for the preservation from injury or spoliation of all timber, animals, or curiosities within said park, and their retention in their natural condition, as nearly as possible." At the same time it directed park managers to "lay out and prepare roadways and bridle paths, to be used for driving and for horseback riding, respectively, and footways for pedestrians[.]" At that time, and for some years afterwards, the horse-drawn carriage was the main mode of transportation on the area's dirt roads. A number of years would pass before the gasoline-powered automobile became widely available and eventually replaced horse-powered transportation.

In the park's early days, more of the park was surrounded by farmland than by city development. But as Washington, D.C., expanded and cars became more prevalent, the character of Rock Creek National Park also began to change. By the time the park received its first comprehensive plan in 1918, landscape architect Frederick Law Olmstead, Jr., "warned against bringing the 'noise and tangle' of city traffic into the heart of the park." (*id.* at p. 4). While the plan laid out a vision for the park's management, many of its recommendations were not implemented. By the 1930s, Rock Creek Park began to be used as a commuter route although Beach Drive remained primarily "an internal park touring road to provide recreational access to the valley." (*id.* at pp. 29, 139). However, in 1966 the opening of the National Zoo tunnel linked Beach Drive with the Rock Creek and Potomac Parkway, creating a continuous route through the park from Maryland to downtown Washington, converting this route for the first time a Rock Creek roadway into a preferred commuting corridor. (*id.* at p. 29).

Over the years, traffic on Beach Drive has steadily increased. Currently, parts of Beach Drive support an average of 9,000 vehicles per day while the parkway sees an average of as many as 55,000 vehicles per day on the busiest parts. (*id.* at p. 29). Commuter traffic accounts for the majority of these totals. According to the draft general management plan, "[c]ommuting has the greatest effect on traffic flows through Rock Creek Park." (*id.* at p. 147). It also states that "[d]uring weekday rush-hours, more than 99 percent of all vehicles using the Rock Creek

and Potomac Parkway and more than 95 percent of vehicles entering Rock Creek Park pass through without stopping." (*id.* at p. 148). Furthermore, the draft plan finds that "[m]ost vehicles travel at or above the posted speed limit through the park. Spot checks revealed that the average speed was 15 miles per hour over the posted speed limit. Commuters in Rock Creek Park also tend to have more aggressive driving habits than do visitors unfamiliar with the park." (*id.* at p. 149, emphasis added). Based on these statistics, it is obvious that the vast majority of commuters are using the park not for recreation—the intended purpose of Rock Creek National Park—but as a commuter highway.

If current trends continue, the problem of commuter traffic on Beach Drive will only get worse. Without deliberate policy and management efforts, traffic models predict that by 2020 automobile traffic will double on portions of Beach Drive. (*id.* at p. 29). In fact, the draft plan concludes that under Alternative B (the status quo) "commuter traffic along some portions of Beach Drive would routinely include near-gridlock conditions, with average travel speeds only a third of free-flow speeds, vehicular backups, and long delays. This situation in Rock Creek Park would increase risks to visitors and disrupt their appreciation of the park." (*id.* at p. 62). Fortunately, the draft plan recognizes that such an increase in commuter traffic would "further compromise the suitability of park roads for recreational uses," and consequently the National Park Service considers Alternative B to be unsatisfactory. (*id.* at p. 63).

Although the traffic-related problems in Rock Creek National Park are projected to become even worse in the future, we believe that the current situation on Beach Drive is already becoming unacceptably bad. The presence of a high volume of speeding commuter traffic on Beach Drive has compromised core environmental and recreational values recognized in the park's establishing legislation. Beach Drive has become a *de facto* commuter highway during rush hours, preventing safe recreational use of the heart of the park during those hours.

Because Beach Drive is a narrow road with blind curves, it is unsafe for recreational users when automobile traffic is present. This fact means that Beach Drive is essentially closed to walkers, runners, cyclists, in-line skaters, children and others when automobiles are present. Commuter traffic creates noise and air pollution, which diminish recreational users' experience (and potentially their health) not only along Beach Drive but also on surrounding hiking trails. The sense of solitude that is so vital to the enjoyment of the park disappears as the 'noise and tangle' of city traffic intrude on the park. The high volume of traffic also disturbs large portions of the park's wildlife habitat, and each year automobiles kill many animals attempting to cross Beach Drive. These factors all contribute to the degradation of the natural qualities that make the park a treasured urban oasis where area residents (and wildlife) should be able to find refuge from the rest of the city.

Our members and many other Washingtonians use Rock Creek National Park for recreation and want to see this unique urban national park protected for our recreational use and for use by our children and grandchildren. Currently, in the average week, approximately 40,000 people recreate on Beach Drive, the majority of these being on weekends when portions of Beach Drive are closed to automobiles. (*id.* at p. 141). As our region's population has increased, so has the demand for recreational opportunities, and over the last two decades, recreational visits to Rock Creek National Park have doubled to approximately 2 million annually. (*id.* at pp.

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6, 30). Since 1980, portions of Beach Drive have been closed to automobiles on weekends, providing recreational users with an important car-free zone for safe and enjoyable recreation. The draft plan recognizes that the weekend closures have been "very popular with the recreating public." (*id.* at p. 6).

Because the existing paved recreational trail ends just south of the intersection of Broad Branch Road and Beach Drive, recreational users must travel north on Beach Drive in order to reach the upper valley and gorge sections of the park, some of the most beautiful parts of the park. As the draft plan notes, a 1980 study by the National Park Service recommended building a separate paved trail paralleling Beach Drive north of Broad Branch Road. (*id.* at p. 29). Knowing the topography of the valley as we do, we are not surprised that after the National Park Service's team of experts inspected these sections of the valley and consulted with other District and federal agencies, they concluded that such an option could not be achieved without irreparably damaging the creek, wetlands, endangered species habitat and historic resources (*id.*). The draft plans goes on to state that "[t]hey concluded that the only way to provide a continuous recreational trail through the valley would be to permanently close sections of Beach Drive to automobiles." (*id.*).

We agree with the National Park Service's assessment, which is why we support Alternative C, permanent closure of Beach Drive from Broad Branch Road north to Joyce Road, from picnic grove 10 north to Wise Road, and from West Beach Drive north to the Maryland state line. We believe that this option would do the most to protect the core environmental and recreational values of Rock Creek National Park.

Rock Creek National Park is a remarkable natural resource—a forested, national park with a stream-cut gorge in the middle of a major city—and one of the greatest recreational resources in the nation's capital and the surrounding region. Beach Drive winds through this beautiful valley, following Rock Creek as it cuts through the forest. Without the overwhelming noise of motor vehicle traffic, one can feel at peace while hearing hear the babbling creek and singing birds. It is for such reasons that the park is enjoyed by so many people on weekends when it is available for recreation, and we believe that, given the opportunity, many people would use it on weekdays.

Alternative D would expand weekday recreation on Beach Drive during mid-day on weekdays to stroller moms, children, the retired, and the innumerable consultants, service employees, and others who do not work a traditional 9-5 weekday schedule. As it stands today, these groups are currently unable to enjoy Beach Drive for recreation. However, Alternative D would leave the area off-limits to even more people who might use Beach Drive for recreation at other times of the day. In contrast, Alternative C would open Beach Drive to recreational use all day on weekdays, greatly expanding the number of people who could take advantage of Rock Creek National Park's precious recreational and natural resources. One would be able to take an early morning run or an evening bicycle ride without the hazards posed by motor vehicle traffic. Permanent closure would enhance the quality of life for far more people all over the Washington, D.C., region.

Another key point is the fact that Beach Drive was not designed for moving traffic through the park but instead to give people *access to* the park. The National Park Service itself recognizes that non-recreational use of park (i.e., commuters in motor vehicles) is a "secondary purpose" permitted only if it does not pose an undue threat to visitor safety, harm the park's resources or create excessive congestion. (*id.* at p. 55). This conclusion seems to be at odds with the National Park Service's choice of Alternative D, which essentially grants commuters a special use permit to be the sole users of Beach Drive during the morning and evening rush hours.

Some area residents fear that closing Beach Drive to commuters would exacerbate traffic on main north-south arteries like Connecticut Avenue, Wisconsin Avenue, 16th Street and others. However, a license plate study commissioned by the National Park Service in 1996 found that many rush-hour drivers use park roads to cross the park east-west rather than traveling north-south. (*id.* at p. 148). Beach Drive closures under Alternatives C and D have, by keeping east-west traffic routes open, been specifically designed so as not to affect east-west traffic flow.

According to the draft plan, in the morning only three percent of the vehicles that enter the park at the Maryland state line actually exit onto the parkway. (*id.*). In the morning, 71 percent of vehicles that exit onto the parkway actually enter Rock Creek National Park *south* of the proposed Beach Drive closures – 17 percent enter at Broad Branch Road, 20 percent at Blagden Avenue, and 34 percent at Piney Branch Parkway. (*id.*, emphasis added). In the evening, only one percent of the vehicles that enter from the parkway exit the park at the Maryland state line. (*id.*). In the evening, 70 percent of vehicles that enter from the parkway actually exit Rock Creek National Park *south* of the proposed Beach Drive closures – 18 percent exit onto Broad Branch Road, 19 percent onto Blagden Avenue, and 33 percent onto Piney Branch Parkway. (*id.*, emphasis added). These figures clearly demonstrate that a relatively small percentage of commuters would be affected by closure of sections of upper Beach Drive during the morning and evening rush hours.

Although the 1890 legislative establishing Rock Creek National Park directs that roads be built in the park, it did not state where those roads should be constructed, nor did it state that driving automobiles should be the dominant use of park roads. It is doubtful that the Members of Congress who created this park could have contemplated that one day the park would be enveloped by urbanization nor that commuter traffic would one day exclude recreational users from the heart of the park. Use of the park has changed in ways they never imagined, and park management must evolve to account for this by limiting the use of some roads to recreation free of automobile traffic. Even under Alternative C, the majority of park roads would remain open to automobiles, allowing access to virtually all picnic areas and even permitting what some would describe as "pleasure driving."

While the Sierra Club is sensitive to concerns that commuter traffic could increase on other roads, national parks were not created to solve traffic problems. Regional transportation planners must properly manage the region's traffic without relying on Beach Drive as a crutch. We support sensible efforts to reduce traffic congestion through the city and the region by improving public transportation and providing automobile commuters with more

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environmentally friendly, convenient and affordable alternatives to driving. We must not sacrifice our precious parks and green spaces in the name of commuter traffic flow.

#### ***Improve Traffic Control on Other Park Roads***

Under any alternative, the National Park Service should take addition measures to control traffic on all park roads open to automobiles. First, impose high occupancy vehicle (HOV) restrictions on roads known to be used by commuters so that only drivers who carpool with two or more occupants per vehicle (HOV-2) are granted the privilege of using park roads during rush hours. The 1996 license plate study commissioned by the National Park Service found that the majority of drivers during rush hour are in single occupancy vehicles. (*id.*). Implementing a HOV-2 requirement would provide area commuters with an incentive to help solve the region's air quality problem by decreasing the number of cars on the roads. Second, on all park roads at all hours, but particularly during rush hour, improve speed limit enforcement, using automated photography and other options to ensure that drivers obey posted speed limits. Third, implement traffic calming measures such as speed humps or other techniques, but select these with sensitivity to the shock sensation that cyclists, in-line skaters or other wheeled recreational users would feel riding over such measures.

#### ***Improve Recreational Trails***

Under any alternative, the National Park Service should take action to improve all park trails. The paved trail parallel to the Rock Creek and Potomac Parkway and Beach Drive should be improved by realigning sections of trail where prudent and maintaining a smooth surface for wheeled recreation. We urge the National Park Service to explore permeable hard surface alternatives to asphalt if such alternatives are feasible given park conditions. The National Park Service should work with the National Zoo to find a way for the zoo tunnel bypass trail to remain open continuously for recreational users. The path through the tunnel is too narrow and poorly lit to be safe. Further, the National Park Service should improve and maintain unpaved hiking trails and bridle paths throughout the park to ensure that they are safe and not prone to excessive erosion.

#### ***Improve Non-motorized Access Points***

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

#### ***Improve Park Interpretation, Education and Information***

Under any alternative, the National Park Service should strive to improve the park interpretation, education and information that it offers to the visiting public. We recognize that the park's 24 entry routes present unique challenges in permitting the National Park Service to reach park visitors. As the National Park Service recognizes, many park visitors do not realize they are in a national park. (*id.* at p. 30). We recommend that the National Park Service place


signs at all entry points announcing that visitors are entering Rock Creek National Park. Where appropriate, such signs should include orientation information and a map clearly showing the location of the sign as well as National Park Service visitor centers and other notable park features. We also suggest that the National Park Service explore the feasibility of broadcasting a radio transmission through the park, as is done at other national parks, to provide park information to drivers, including information about visitor centers and restrictions on traffic on various park roads. Appropriate signs at park entry points should inform drivers of the radio frequency.

The Sierra Club would support the National Park Service vacating exiting park administrative offices at Peirce-Klingbe Mansion and the U.S. Park Police vacating its substation in the Lodge House provided that economical office space can be found near the park without diminishing funding available for other vital park needs such as traffic management, trail maintenance, visitor education, and other important activities. We are enthusiastic about the prospects of opening these buildings to visitors for park interpretation, education and information. We oppose the construction or any new facilities within park boundaries that would harm the park's natural environment.

#### ***Conclusion***

The draft general management plan for Rock Creek National Park offers the best opportunity since the early days of the park to implement a manage regime that will adequately protect the park from the negative effects of commuter automobile traffic on Beach Drive and on other park roads. The Sierra Club strongly believes that Rock Creek National Park will never realize its fundamental environmental and recreational values as a national park until it ceases to be a commuter highway. Therefore, we urge the National Park Service to implement Alternative C.

Sincerely,



Jason E. Broehm  
Chair, Parks & Land Use Committee  
Washington, D.C., Chapter

cc: Congresswoman Eleanor Holmes Norton  
Mayor Anthony A. Williams  
D.C. Council members  
Dan Tangherlini, Director, DDOT

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From: Sierra Club  
To: Roger Williams and Sheila Macdonald  
Cc: Superintendent, Rock Creek Park

Subject: Rock Creek Parkway Closing

Dear Roger and Sheila,

Thanks for the reply to our appeal for volunteers. Sierra Club takes many controversial stands, and it would be unrealistic to think that all our members would agree on any one of those positions. I do, however, want to correct your assumption that our decision was made without input from residents close to the park. Several of our executive committee members and active volunteers live close to the park and believe, like me, that parks are for other purposes than commuter throughways.

We do not dispute that arterial streets like Connecticut or Wisconsin Avenues will carry greater traffic volume with the closing of Beach Drive. We do not, however, believe that the residential streets on which most nearby residents live will be affected. As to your argument that no one will forsake their cars and take public transportation, my question would be "why not?" If public transport has become so unthinkable, it is surely because highways, cars, and gasoline have been subsidized at the expense of more sensible and benign forms of transportation. And where else would be better to change that than in a beautiful, green stream valley like Rock Creek?

And who would be better to take such a stand than Sierra Club? We have, after all, been advocates for public land since saving the Yosemite Valley in the 1890's.

Thanks again for your comments.

Respectfully,

Chris Craig  
Secretary, DC Chapter

-----Original Message-----

From: Williams or Macdonald  
To: nps\_rocr\_gmp@nps.gov

Subject: Rock Creek Parkway Closing

Both my significant other, Sheila Macdonald, and I, residents near Rock Creek Parkway, are unalterably opposed to any further closure of the road than is done at present. Arguments that closure for additional hours, let alone completely, to auto traffic will not increase traffic on neighboring streets simply defy reality: Where else will that traffic go, if not to streets that parallel or cut through the park or to Connecticut Ave? Where else can it go? Do proponents of closure think drivers of those cars will suddenly abandon them and either stay home or start taking public transportation? Obviously, they will do neither.

We ourselves depend on Oregon and Connecticut avenues for commuting and other purposes, and we shudder to think what those routes will be like--especially during rush hours--if the parkway is closed for additional stretches of time.

I should add that I am a member of the Sierra Club, and I am very disappointed that the DC chapter has taken a pro-closure position. If its proponents lived alongside or near the park, I doubt seriously that any of them would favor closure.

We, and I'm certain the great majority of our neighbors, ask the Park Service not to increase closure of the parkway at all.

Sincerely,

Roger Williams  
Sheila Macdonald

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Dear Superintendent:

I use the Rock Creek Park for bicycling on the weekends when it is closed to car traffic. I would like to use it during week days as well. I urge you to keep it closed to cars during the weekday limited hours in the current proposal.

It would be even better if someday it was closed to all car traffic. It would help to make it a commuter route for bicyclists, roller bladers and runners. This would be helpful in fighting our growing weight problems and growing air pollution problems. Thank you for your consideration of this matter.

Linda H. Freimark  
WABA Board Member  
Great Falls Group, Sierra Club, BoD

MR. CAINE: Thank you. Thank you for the opportunity to speak. My name is Brian Caine. I speak on behalf of Signatory Residents of the 1400 block of Taylor Street, Washington, D.C.

We are located immediately adjacent to the eastern most tip of Rock Creek Park at Piney Branch Parkway. I'm sure you're familiar with it.

Our neighborhood embodies what the term "east of the park" often implies' no such bars, trendy boutiques or tourist landmarks grace our streets. Personal safety and security is a constant concern. The most positive signature feature of our neighborhood is close proximity and access to Rock Creek Park. As such, we view park related issues with scrutiny and compromise proposals with a measured dose of skepticism.

Such is the case with Park Service options A,C and D for Rock Creek Park. We strongly support option B no change to current management. Closing Beach Drive during the week we view as elitist and divisive, literally locking the gates on our opportunity to fully enjoy and make use of the park during weekdays.

We are unnerved by a vocal minority who wish to limit Beach Drive access to a privileged few. While well intentioned, these self-serving interest groups exclude others while seeking maximum gratification for their own desires. We expect no consideration in their parochial views. We do, however hope, expect and demand the federal government and its agencies to fulfil their primary mission assuring all citizens equal access to federal programs, facilities and opportunities.

The proposals to further restrict or eliminate Beach Drive access woefully fail to achieve this equity objective.

Some facts. Under the MPS proposed plan senior citizens, retirees and handicapped are summarily denied open park access exactly when and how are they are most likely to visit.

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Beach Drive is already permanently closed 24 hours a day 114 days a year, nearly one out of every three calendar days. This in itself represents a significant compromise. Why is this disregarded in the current debate? Options A, C and D negatively impact safety and security in our neighborhood diminishing a quality of life fragile enough already. In closing, we acknowledge and appreciate the Park Service for its day-to-day management. However, we implore you to reconsider your inequitable proposals. Implement option B no change to current management which maintains a pragmatic, political and citizen endorsed compromise on Beach Drive usage. Do not lock the gates on us. Preserve an environment where we all can enjoy this great resource on an equal basis.

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

MR. WILSON: Good evening. My name is Dave Wilson. I live D.C. From that address, you can see I have a direct interest in this. I'm here on behalf of the 16<sup>th</sup> Street Civic Association. I want to commend the NPS and Adrienne Coleman for the openness of this process which I hope continues to be as open. Adrienne came to our Civic Association meeting and opened herself up to answering questions. We favor Alternative B, that is to say no change. Why is that? Because the benefits are not clear, but there is nothing speculative about the cost. We have a very bad traffic problem in this area, perhaps the worst in the country according to AAA. In terms of what we're looking at in our neighborhood, when you look at page 264, look at Blagden Avenue where there would be 500 vehicles at the maximum non-peak hour increase which is for some reason characterized as a minor increase in traffic. Compare that to when they characterize the traffic increase at Connecticut Avenue, north of Tildon, 500 vehicles is said to be a perceptible increase in traffic. Not being a traffic engineer but being a student of the English language, I don't understand those two statements. They seem rather contradictory particularly given that both of those areas are very common in the sense of having very heavy traffic. An additional 500 cars is quite a lot of cars. The benefits in terms of increased use by bicyclists and others during the day is really very speculative. But what is not speculative, to repeat myself, is how much traffic will be diverted into that part of 16<sup>th</sup> Street if there is a closure during the weekdays. There are two points that I want to make in closing. One is there's been a lot of talk about traffic dampening at least in the study, not much in the speeches here today. But I'm very concerned about the traffic dampening because unlike the other alternative issues which have been spelled out in some detail the traffic dampening is something that is unclear. When I asked Adrienne Coleman about it, up front she indicated that the specifics of traffic dampening would be something that would happen.



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If they are going to do traffic dampening, certainly they should study it. Then they should have the process open just as this process is open. There should be a proposal and an opportunity for comment by the people just as we're having these comments.

The final thought is there hasn't been a management plan in Rock Creek Park since it was opened in 1890. I gather it's perhaps the only major park in the system or maybe the only one that doesn't have a management plan. But if you are going to have a plan for 15 or 20 years after not having had one, what you should do is you should allow for the possibility that you might be wrong as to whatever alternative that you choose and to have the opportunity for a review spelled out within a specific period of time. If any dramatic changes are made, the review should come after one year in an open process rather than being told that this is a plan that's going to last 15 to 20 years no matter how badly it turns out. Thank you very much.

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

Subject: Comments of Sixteenth Street Heights Civic Association (SSCHA)

These comments are being made on behalf of the Sixteenth Street Heights Civic Association (SSCHA), a neighborhood association whose members would be adversely affected if NPS adopts weekend closures of the portions of Beach Drive currently closed during weekends. SSCHA strongly opposes changing the status quo and has adopted a resolution to that effect.

In particular, SSCHA is concerned about the peak diversion of 560 cars per hour on Blagden Avenue (P.264 of the NPS report) and the concomitant flow of those vehicles in SSCHA's neighborhood. We question increasing traffic congestion in this Metro area, the second most congested Metro area in the country.

Moreover, we question whether there has been a sufficient analysis of extending the bikepath. Because the NPS report has not properly considered this issue its proposed weekday closures cannot be implemented.

There are two additional points that must be considered. First, before any traffic dampening measures can be taken, there must be an opportunity for public comment on such measures. Second, if, contrary to SSCHA's urgings the weekday closures are initiated, public comment should be sought within one year of such initiation regarding whether the closures should be continued.

David Wilson  
Second Vice President, SSCHA

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Page 1 of 1TIFERETH  
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Tel 202-882-1605  
Fax 202-829-0635  
TTY 202-882-7041

ROCK CREEK PARK  
Rabbi  
Ethan Seidel  
A conservative  
egalitarian congrega-  
affiliated with the U  
Synagogue of  
Rabbi Ementus  
A. Nathan Abramowitz  
Conservative Judaism

7/7/03  
ד' תמוז תשס"ג

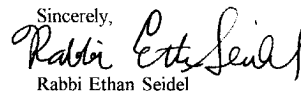
Superintendent Adriene Coleman  
Rock Creek Park  
3545 Williamsburg Lane  
Washington, DC 20008

Dear Ms. Coleman:

Concerning the National Park Service's plan to close parts of Rock Creek Park during auto traffic during non-rush hour periods. I am in favor of your plan, for the following reasons:

- 1) As someone who both lives and works in Ward 4, and whose office window looks out on 16th street during the day, I can attest to the fact that (even during the present construction on 16th St.), there is not too much traffic on 16th St. when rush hour is over. The few extra cars from the Park could easily be accommodated on 16th St.
- 2) As a bicycle commuter (I have cycled well over 10,000 miles in the District and surrounding suburbs over the last 10 years), I find that I have come to avoid cycling in upper Rock Creek Park even in the middle of the day - where there is no bike path, I must ride on the road, and the lack of any shoulder on the road makes even a small amount of traffic hazardous to my health. I have been hit by a car only once in my bicycling, and that was last year in upper Rock Creek Park, in the morning, after rush hour. (I wouldn't dare attempt the Park *during* rush hour.) It's a shame that a national park has become so hostile to anything but motorized traffic.

I hope you will press on with your alternative D, and close parts of the park to motorized traffic during weekdays.

Sincerely,  
  
 Rabbi Ethan Seidel



UNIVERSITY OF  
MARYLAND  
DEPARTMENT OF HISTORY

July 7, 2003

Superintendent of Rock Creek Park  
National Park Service  
Rock Creek Park  
3545 Williamsburg Lane, NW  
Washington, DC 20008-1207

Dear Superintendent:

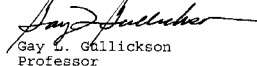
In the Outlook section of the Washington Post on July 6, 2003, Jim McCarthy, coordinator of the People's Alliance for Rock Creek, claimed that the argument that closing Beach Drive on weekday mornings and afternoons will restrict the access of senior citizens and people with disabilities is "specious." I am concerned that you may think the same thing. The argument that the park will become inaccessible to people with disabilities and many senior citizens is not specious. It is, unfortunately, true.

It is my experience that accessibility is easily overlooked or misunderstood when able-bodied people make decisions. I sit on the University of Maryland's Architectural Design Standards Board and have had innumerable discussions with architects about why their plans will not make a building truly accessible. Their misunderstandings or ignorance seems to be shared by Jim McCarthy and I fear may also be shared by you.

If Beach Drive is closed, I and others who use crutches, canes, walkers, and wheelchairs will no longer be able to enjoy the park. The same is true of people who use no devices but have trouble walking. The access roads into Beach Drive are too long and too hilly for us to navigate, not to mention that there is no parking along the borders of the park. We do not walk or roll long distances. What makes the park so wonderful now is that it is as accessible to us as it is to bike riders, skaters, and exercise walkers. We can drive into the park, stop at one of the eight picnic groves, and enjoy the park, either by getting out of our cars, or simply by sitting and enjoying the area with the car doors open. This may seem like a little thing to you, but it is important to us.

I don't know if it is legal for you to make the park inaccessible to the disabled, but it should not be. It is what the spirit of the Americans With Disabilities Act, if not the letter, is all about. I urge you to keep Beach Drive and all of the park open for all of the people, not just for the young and able bodied. I support alternative B, the no close option.

Sincerely,

  
 Gay U. Gillickson  
 Professor

2100 Washington Avenue  
MD 20910  
301-565-3041

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Dear Superintendent Coleman,

I'm writing because I STRONGLY SUPPORT THE WEEKDAY CLOSURE OF UPPER BEACH DRIVE TO COMMUTING MOTORISTS who are merely passing through Rock Creek National Park. It should be clear to anyone who appreciates our natural heritage that Rock Creek National Park is a priceless and irreplaceable asset in the heart of DC and should be managed as a real park seven days a week (and, ideally, 24 hours a day), not as a shaded commuter highway.

I won't repeat the many valid arguments for this position because they have been stated repeatedly by others for decades. I am truly puzzled, however, why NPS failed to even test weekday carfree recreation zones during the past seven years since the June 1996 series of public meetings on the Rock Creek Park GMP. FOR SEVEN LOST YEARS, NPS management continued to allow Rock Creek Park to be severely and inappropriately degraded as a scenic route for automobile commuters who selfishly insist on driving through the primary greenway of a city with the second largest rail rapid transit system in the USA plus an extensive bus transit and arterial street system. In my opinion, NPS management of Rock Creek Park has been weak and irresponsible, dishonoring its true mission.

Instead of only now proposing a midday test closure of upper Beach Drive during weekdays, NPS could have ample data demonstrating that such a closure would vastly improve the park and its natural habitat, while negligibly affecting traffic volumes or congestion elsewhere in DC. NPS could now be proposing to extend this closure to all but six hours each weekday or perhaps to all hours of the day, measures that would much more effectively manage Rock Creek Natural Park for its intended purposes as a public pleasure ground and natural preserve.

The proposed weekday recreation hours won't allow Washingtonians to truly enjoy Rock Creek Park either before or after normal work hours or to enjoy upper Beach Drive for pollution-free commuting by bicycling, skating, or running. Moreover, Beach Dr will remain a corridor for congested, motorized commuting.

Before closing, I ask that NPS correct the deplorably decrepit and unsafe conditions of its paved shared use paths in Rock Creek Park, particularly the steam valley path running south of Broad Branch Rd. This path should be rebuilt on a straighter and wider alignment so that it truly meets AASHTO's current minimum design guidelines for paved shared use paths. I'm certain that the regional bicyclist and trail-user communities would strongly support an NPS request for the necessary funds.

Sincerely,

Allen Muchnick, President  
Virginia Bicycling Federation  
PO Box 5621, Arlington VA 22205  
<http://vabike.org>

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MS. MCCANN: Hello, I'm Barbara McCann, M-C-C-A-N-N. I live on the east side of the park. Tonight right now I am speaking as a board member of the Washington Area Bicyclists Association which represents more than 7,000 people in the Washington Region.

WABA has been working since 1978 to improve bicycle access to the trails in Rock Creek Park and management of motorized portions of the roadway. A new national survey shows that 53 percent of Americans want to bicycle more, yet one half of Americans are dissatisfied with the cycling environment. Most of those people want more and better cycling facilities.

Alternative D offers us some of those facilities. It will increase access to bicyclists in the heart of the park for both recreation and for transportation while preserving 90 percent of the roads in the park to motorists 100 percent of the time. It's a beginning of a more balanced approach to using this resource.

Beach Drive is restricted now. Bicyclists, people with strollers, and people who want to walk in the park are not able to do so on Beach Drive because of the traffic. It's unfortunate that the valley is so narrow that we cannot have separate facilities, but that is simply the way it is. You can't stand on Boulder Bridge and admire the leaves and the creek on weekdays. You can only do that on weekends. As we know, that's a very popular use of the park.

Thirty-four percent of residents in the District of Columbia don't even own automobiles, and they are unable to use this portion of the park. In addition, Rock Creek Park is a national park and a national resource. While some local residents may oppose this plan, WABA believes the higher use of this national park is to open it for use by tourists, people who work unusual shifts and cannot access Beach Drive on the weekends, children in school groups, and even workers who work in work sites around the national park and can come down on their lunch hours and use this facility.

Restricting through traffic will in fact connect upper Rock Creek Park and beyond all the way down to the National Mall enabling tourists on bicycles to enjoy Washington's well known monuments as well as this natural area. As a previous speaker said, there are hundreds of roads available for through traffic in the District of Columbia and Maryland. There's only one Rock Creek Park. WABA would like Alternative D to be chosen.

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

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July 15, 2003

Adrienne Coleman, Superintendent  
Rock Creek Park  
3835 Williamsburg Lane, NW  
Washington, D.C. 20008-1207

Dear Superintendent Coleman:

On behalf of the Washington Area Bicyclist Association (WABA) I am submitting the following comments on the draft general management plan for Rock Creek Park. Our comments can be generally placed in four categories: 1. Paved trails in the Park; 2. General motorized traffic in the Park; 3. Traffic management on Beach Drive in the Park; and 4. Impacts of Park management on adjacent communities.

## 1. PAVED TRAILS

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

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

Trail width is insufficient throughout the Park. While it may not be possible to achieve the trail width design standards of the American Association of State Highway Transportation Officials (AASHTO) in certain segments of the trail, opportunities to widen the trail at transition points would be particularly useful, such as the P Street trail crossing. Because the natural setting of the trail restricts its width south of Shoreham Hill, the realignment of Rock Creek and Potomac Parkway scheduled for this fiscal year represents a tremendous opportunity to achieve safer trail widths. Such an opportunity presented itself in 1999, when the District Division of Transportation's rehabilitation of the M Street Bridge resulted in a realignment of the Parkway under the Bridge to increase the trail width by one foot, a tremendous safety improvement. WABA encourages the Park Service to seize this chance to improve the safety of the entire length of this trail segment through the realignment of the Parkway.

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

**C. Access.** WABA supports the Park Service's commitment in the management plan to resolve the issue of limited access for trail users in the vicinity of the National Zoo. Paved trails are also the solution to better connections to neighborhoods adjacent to the Park, a problem that was identified in the management plan.

## 2. TRAFFIC CALMING

WABA supports the implementation of an aggressive traffic calming program in Rock Creek Park to improve the safety of all Park users. Speed tables, enforcement through automated photography, improved signage and enforcement all contribute to the safety and enjoyment of Park visitors, be they motorists or non-motorists.

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### 3. SUPPORT FOR NATIONAL PARK SERVICE MANAGEMENT ALTERNATIVES

WABA supports the National Park Service's preferred traffic management alternative D, as well as the traffic calming, trail improvements, and Rock Creek and Potomac Parkway Zone provisions of alternative A and C. These provisions leverage the metropolitan Washington regional investments in trail development and traffic demand management strategies to achieve a higher return for tax dollars spent.

### 4. IMPACT ON ADJACENT COMMUNITIES

Much has been stated during the public comment period about impacts from changes in the status quo for adjacent neighborhoods as it relates to motorized traffic. Less publicized has been the effect of balancing motorized and nonmotorized visitor access for neighborhoods in which there is relatively low automobile ownership, as is the case in the District of Columbia neighborhoods of Adams Morgan and Mount Pleasant which are adjacent to the eastern border of the Park. In these densely populated neighborhoods, the 2000 Census documented that about 50% of the households did not have access to a car. Unless some provision is made for nonmotorized visitation to Rock Creek Park Monday through Friday, these Park neighbors will be unable to access the heart of the Park Monday through Friday. The need for access to the Park for persons without automobiles was documented in the 1918 Rock Creek Park Study conducted by the Olmsted. This need remains unmet today. WABA commends the National Park Service for its public participation process in the development of this plan. WABA supports the National Park Service's stewardship efforts embodied in the draft final general management plan.

Sincerely,  
Ellen Jones  
Executive Director  
Washington Area Bicyclist Association

WashingtonParks@aol.com  
Subject: Comments on Draft Rock Creek General Management Plan

Ms. Adrienne Applewhaite-Coleman, Superintendent  
Rock Creek Park, National Park Service  
3545 Williamsburg Lane, NW  
Washington, D.C. 20008  
July 15, 2003

Dear Superintendent Coleman:

On behalf of Washington Parks & People, I am writing to provide comment on the draft General Management Plan for Rock Creek Park. We thank you and the National Park Service for this important opportunity to provide input on the future of one of America's most important major urban parks. Sadly, Rock Creek Park's value as the 15th largest urban park in America is undermined by the ways that it has become severely under-valued, under-funded, under-connected, and, especially during rush hours, over-driven.

For too long, much of the budgeting, management, and future of Rock Creek Park has revolved around its roadways. We believe the time has come for a comprehensive plan to make the entire park come alive as the great natural and cultural resource that it is -- for its adjacent and nearby communities, for the Capital and surrounding region, and for tourists coming to DC from across the nation and around the world. In this spirit, we support a new emphasis on non-motorized recreation throughout the Park, combined with broadened and innovative community-based environmental education, stewardship, and programming of all kinds. This should include the following components:

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

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2. **CONNECTION.** There should be more easy, enticing, and educational connections between the Park and the wider Fort Circle, Escarpment, C & O Canal/Capital Crescent, and Potomac Heritage National Scenic Trails.

3. **PUBLIC EDUCATION & PARTNERSHIPS.** The Park General Management Plan will not be complete absent a comprehensive interpretive plan for the park. Going beyond the present locus of interpretation in a small section of the upper part of the Park, the interpretive plan should include a fuller assessment of the cultural and environmental programming and stewardship possibilities for the entire Park. This is essential for restoring and deepening lasting community engagement in supporting the life and future of the Park. The plan should identify and work with community partners to assess and develop interpretive and stewardship programs for significant geological, ecological, and cultural sites throughout the park. In addition to all of the sites within the main part of the Park, the plan should link the Park to sites of historic significance that are adjacent to or near the GMP study area, such as Montrose and Dumbarton Oaks Parks, the Mount Zion and Female Union Band Cemetery, Jackson Hill and the Holt House, Historic Adams Mill Road, the Pierce Park African American and Quaker burial grounds, the Calvert Street "toddle house," Meridian Hill Native American spiritual ground, and similar historic sites. It is critical that the interpretive plan be integrated into the GMP, so that critical facilities, operations, stewardship, circulation, and funding questions are addressed in the context of interpretive needs and possibilities. In this way, every program in the Park will advance a broad-based, active, permanent constituency to stand up and help the park, such as those that help other major urban parks across the nation. Finally, the comprehensive interpretive plan should develop options for working with community partners to develop interpretive programs and products and to advance permanent community-based park advocacy, partnership, and conservancy.

4. **CAPITAL CAMPAIGN.** As others have done across the national park system, the Park should ambitiously seek a broad range of public, philanthropic, and earned revenue. The Park should assess the Park's comprehensive capital needs, proposed improvements, and possible funding sources. Such capital projects could include the following:

- more ambitious eradication of invasives and restoration of native plants and habitats;
- more environmental and cultural heritage documentation;
- more interpretive programs, products, and facilities for boosting public understanding and appreciation of the Park;

- more far-reaching preservation and restoration of the park's less known cultural sites, such as the Miller Cabin, Soapstone Quarry, other mill locations, spring houses and similar outbuildings, and other archeological sites; and
- endowed gifts to support ongoing enhanced stewardship and programming in the Park.

5. **WIDENED OUTREACH.** To better connect to DC's densest and most diverse populations, as well as to one of the prime areas where tourists enter the Park, the Park should re-establish public use of at least part of Edgewater Stables, as a base of interpretive programming for the lower Park. Just as the other administrative and operational functions are proposed to be moved out of the Park, the regional Park Police horse training function at Edgewater should be examined to determine whether it is serving the Park in its present location. The adjacent historic lower Bridal Path and retaining walls should be restored, along with the historic path from Pierce Park and Jackson Hill into the Park. This outreach should include a massive increase in use of volunteers to assist the Park. Parks & People can assist with this effort.

6. **INTERPRETIVE SALES & CONCESSIONS.** The Park should identify avenues for the Park to benefit from sales of appropriate interpretive materials, fees for audio tours and other programs, and concessions that could enhance the visitor experience such as bike rental, refreshments, and natural gas-powered trolley loop tours of the Park.

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7. MITIGATION OF VEHICULAR DAMAGE. The volume of rush-hour traffic in the Park, coupled with the high speeds of vehicles in many sections of the Park at all times, cause severe damage to the value and visitor experience of the Park. In addition to the proposed traffic calming, the Park should explore reducing the 25 mph speed limit to 15 mph, and charging fees for vehicular through traffic during rush hour. The costs to the Park of supporting this function are inappropriate to be borne by NPS and all those who wish to use the Park at the beginning and end of each day. The Park should continue to work to enhance non-motorized options for all to access and experience the Park at all times.

Thank you for your attention. Washington Parks & People looks forward to working with NPS and Rock Creek Park as the draft GMP is fleshed out into a more comprehensive and encompassing document. We stand ready to assist in any way with the implementation of these recommendations.

Sincerely,

Steve Coleman, Executive Director  
Washington Parks & People  
Josephine Butler Parks Center  
2437 15th Street, NW  
Washington, DC 20009  
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MR. COLES: Good evening. My name is Alphonso, A-L-P-H-O-N-S-O, Coles, C-O-L-E-S. I represent the Washington Regional Network for Liveable Communities, WRN, a local non-profit organization promoting transportation investments, land use patterns, and neighborhood designs that enhance existing communities and the environment of the Washington, D.C. Region.

WRN strongly supports the National Park Service's recommendation of Alternative D of the general management plan EIS to restrict motorized access in Rock Creek National Park during weekdays. Expanding current restrictions on Beach Drive to include the 9:30 a.m. to 3:30 p.m. on weekdays is an important effort improve safety and promote recreational opportunities within the park.

The popularity of Beach Drive for commuting has led to conflicts with its use for recreation. Many of the park's roadways do not have designated lanes for bikers and joggers, making them dangerous for recreational use.

Alternative D strikes a strong balance by creating the best possible experience for non-motorized recreators and drivers. Although Beach Drive is used by commuters during rush hour, there is low traffic flow during the rest of the day. A traffic study conducted for the National Park Service found that a partial closure of Beach Drive would not significantly increase traffic congestion on alternative roads.

As traffic congestion continues to increase in the Washington area, policies are needed to encourage non-motorized travel. Weekday recreation zones on Beach Drive would encourage alternative transportation modes, cycling. The first closures of Beach Drive to cars in the early 1980s were successful in making Rock Creek Park the recreational mecca that it's known for today drawing thousands of visitors on the weekends.

Enjoyment of the park along much of Beach Drive is currently limited to weekends. Restricting automotive traffic during weekdays will greatly expand recreational opportunities and significantly advance the park in creating the best possible experience for its visitors.



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The weekday restrictions coupled with the proposed measures to improve visitor safety, controlled traffic speeds throughout the park, and education opportunities will go a long way in enhancing the overall experience of Rock Creek National Park. Alternative D gives everyone, retirees, families with small children, school groups, and tourists the chance to run, skate, walk, bike, and enjoy the park everyday, not just on weekends. Thank you for the opportunity to testify.

**NEAL R. GROSS**  
COURT REPORTERS AND TRANSCRIBERS  
1323 RHODE ISLAND AVE. N.W.  
WASHINGTON, D.C. 20005-3701

Subject: Closure of RCP to traffic

I am writing to endorse the management plan proposed for RCP that entails closure of Beech Drive from 9:30 to 3:30 on weekdays. RCP is one of the great treasures of the DC area. I am a bicycle commuter and weekend cyclist. I have learned to LOVE those gates that stop traffic at several junctures in the park, and make it safe and enjoyable for extended rides on weekends. Having the same option on weekdays would be a great improvement in the quality of the park, and I would alter my commute hours to take advantage of the hours the park is closed to commuters.

I drive in RCP, as well; it is the best route between my home in Mt. Rainier in Prince George's County and Reagan National Airport. But the recreational benefit of a park closed to automotive traffic far outweighs the minor inconvenience of finding alternate routes. I hope you will uphold the park's highest use and not yield to commuters, who have several other choices.

Paul Jolly  
Regional Director of Development, Midwest  
The Wilderness Society  
1615 M Street NW  
Washington DC 20036

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Subject: Rock Creek Park Weekday Closure Support

Dear Fellow Service Provider,

The proposal to close Beach Drive in Rock Creek Park during the weekday is a step in the right direction! This proposal is in full alignment with the "Keep America Beautiful" program and shows a solid, well thought out and reasonable measure towards that end.

As the director of a non-profit organization that just adopted a section of Beach Drive to clean-up once a month, I find that the additional closure times will not only open the park to recreational activities; it will protect the earth, air and water from further litter, pollution and noise activity.

Our park is a national treasure that deserves our full community support. Thank you for your service and efforts.

Sincerely,  
Shawn K. Supers  
Director, Wise Women Foundation  
1852 Ingleside Terrace, NW  
Washington, DC 20010



**Woodley Park**  
Community Association

P.O Box 4852 Washington, D.C. 20008

July 8, 2003

Superintendent, Rock Creek Park  
3545 Williamsburg Lane, NW  
Washington, DC 20008

RE: Draft General Management Plan, Environmental Impact Statement Summary  
Rock Creek Park and the Rock Creek and Potomac Parkway

Dear Superintendent:

This letter is submitted by the Woodley Park Community Association (WPCA) on behalf of Woodley Park and its 7000 households. At its June 2, 2003 meeting, the WPCA's Executive Board reviewed and discussed the draft plan, with particular attention to *Table 2: Summary of Key Features of the Alternatives*.

Based on that discussion, the Executive Committee adopted the following statement:

"The WPCA supports Alternative B (Continue Current Management/No Action), preferably with additional improvements to vehicular safety. The WPCA has strong reservations about Alternative A (Improved Management of Established Park Uses) and Alternative C (Nonmotorized Recreation Emphasis)

"The WPCA believes also that any assessments of the effect of the Draft Plan's Alternatives on traffic in Woodley Park included in existing Environmental Impact Statements are out of date and inaccurate.

The WPCA therefore requests that the final Environmental Impact Statement include an assessment of the effects of Alternatives on traffic efficiencies and intersection grades for the following Woodley Park intersections: Connecticut Avenue and Calvert Street; Connecticut Avenue and Woodley Road; Connecticut Avenue and Cathedral Avenue; Calvert Street and 24<sup>th</sup> Street; and Calvert Street and 29<sup>th</sup> Street."

We look forward to further discussing the proposed options with you. Thank you in advance for your attention to our concerns.

Sincerely,  
  
Barbara J. Ioanes, President

cc: National Park Service, National Capital Region Office