



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







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## INTRODUCTION

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

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

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

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

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

## INTRODUCTION

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

## GUIDANCE ON RESPONDING TO COMMENTS

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

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

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

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

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

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

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

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

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

## DEFINITIONS

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

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

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

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

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

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

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

## PURPOSE OF THIS VOLUME

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

## INTRODUCTION

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

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

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

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

### Comment Management

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

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

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

### Content Analysis

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

The process included four components:

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



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

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

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

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

### **Response to Comments**

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

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

### **COMMUNICATIONS**

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

## INTRODUCTION

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

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

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

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

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

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

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

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

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

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

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

## COMMENTS

The communications included 5,156 individually coded comments.

### Substantive and Non-Substantive Comments

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

Non-substantive comments included:

## INTRODUCTION

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

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

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

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

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

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

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

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



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

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

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

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

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

## INTRODUCTION

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

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

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

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

## INTRODUCTION

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

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

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

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

## INTRODUCTION

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

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

## PURPOSE OF AND NEED FOR ACTION

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

### PARK HISTORY AND USE RELATIVE TO MANAGEMENT PLANNING

#### Issue 1: Include Historical Information

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

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

#### Issue 2: Modify Maps

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

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

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

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

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



## PURPOSE OF AND NEED FOR ACTION

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

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

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

### Issue 3: Focus Is Inappropriate

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

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

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

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

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

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

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

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

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

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

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

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

## PURPOSE OF AND NEED FOR ACTION

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### Issue 7: Justification for the Plan

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

**Response:** Comment noted.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Response:** Comments noted.

## GEOGRAPHIC AREA COVERED BY THE GENERAL MANAGEMENT PLAN

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

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

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

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

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

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

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

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

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

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

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

## PLANNING DIRECTION OR GUIDANCE

### Issue 1: Text Should be Corrected

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

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



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### Issue 2: Park Roadways Are for Driving

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### Issue 4: Bicycling Use

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

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

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

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

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

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

**Response:** Comment noted.

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

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

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

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

## **Representative Comment 3**

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

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

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

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

### Issue 6: Compliance with the Organic Act

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

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

**Response:** Comments noted.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## DECISION POINTS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## **CONNECTED, CUMULATIVE, OR SIMILAR ACTIONS**

### **Issue 1: Include Other Actions**

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

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



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

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

## Issue 2: Include Other Organizations

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

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

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

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

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

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

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

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

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

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

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

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

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

## PURPOSE OF AND NEED FOR ACTION

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## PURPOSE OF AND NEED FOR ACTION

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

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

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

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

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

## ALTERNATIVES

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

### Issue 1: Text Should Be Corrected

#### Comment: Regarding Alternatives

##### Alternative A

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

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

##### Alternative B

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

##### Alternative C

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

##### Alternative D

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

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

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

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

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

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

## ALTERNATIVES

### POTENTIAL MANAGEMENT PRESCRIPTIONS

#### Issue 1: Change a Management Prescription

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



## ALTERNATIVES

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

## SUPPORT FOR OR OPPOSITION TO THE ALTERNATIVES

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

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

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

## COMPONENTS OF THE ALTERNATIVES

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

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

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

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

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

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

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

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

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

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

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

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

## ALTERNATIVES

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## ALTERNATIVES

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

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

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

## NEW ACTIONS OR ELEMENTS

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

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

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

### TRANSPORTATION, PARTICULARLY AUTOMOBILES AND BICYCLES

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

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

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

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

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

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

## NEW ACTIONS OR ELEMENTS

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

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

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

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

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

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

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

## Issue 2: Convert Bridle Trails to Bicycle Trails

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## ADMINISTRATION AND OPERATIONS FACILITIES

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

### Issue 5: Change Staffing Levels

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

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

## INTERPRETATION, ORIENTATION, RECREATION, AND EDUCATION FACILITIES

### Issue 1: Improve Signage and Other Orientation

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

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

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

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

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

## **Issue 2: Improve Interpretation**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## NATURAL RESOURCES

### Issue 1: Improve Management of Water Quality

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

## FUNDING AND PARTNERING

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

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

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

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

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

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

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

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

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

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

## NEW ACTIONS OR ELEMENTS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## AFFECTED ENVIRONMENT

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

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

### AIR QUALITY

#### Issue 1: Include More Current Data

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

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

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

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



## AFFECTED ENVIRONMENT

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

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

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

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

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

## **ROCK CREEK AND ITS TRIBUTARIES**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## AFFECTED ENVIRONMENT

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

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

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

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

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

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

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

## **WETLANDS AND FLOODPLAINS**

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

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

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

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

## DECIDUOUS FORESTS

### Issue 1: Text Should Be Corrected

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## **PROTECTED AND RARE SPECIES**

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

## **OTHER NATIVE WILDLIFE**

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

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

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

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

## **Issue 2: Include Information on Birds**

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

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

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

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

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

I have three points to make.

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

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

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

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

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

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

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

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

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

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



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

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

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

## ARCHEOLOGICAL RESOURCES

### Issue 1: Archeological Resources Information Is Incomplete

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

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

**Response:** Data in the general management plan are highly summarized, but are adequate to support the evaluation of impacts that would result from the four park management alternatives. The general management plan was updated to reflect progress on a four-year archeological identification and evaluation study of the park that is now in its second year.

## HISTORIC RESOURCES AND CULTURAL LANDSCAPES

### Issue 1: Clarify Management Approach for Peirce Mill

**Representative Comment 1:** The various alternative plans presented in the GMP are virtually identical in their references to Peirce Mill. However, the report fails to mention that the objective of the project is to restore the mill to operation. For example, on page 99 it says: "The mill would be managed consistent with the recommendations of a historic structure report, currently nearing completion. The mill would provide demonstrations of the historic milling industry in the valley." And again in Table 6 on page 108 the reference to the mill states "Rehabilitate the mill to focus on history of milling and land use in the Rock Creek area". While it is true that the HSR presents a plan which would indeed restore the mill to operation, we would like to see a specific statement that the ultimate objective is an operating mill. Such a statement would reassure our members and our donors that the Park is committed to an operating rather than a static demonstration of milling -- a "living museum of milling". (rocr1581.001)

**Representative Comment 2:** While the GMP budgets \$1.73 million in capital costs for Peirce Mill, this is insufficient funding to restore full operation of the mill. When restored again to operation, the Mill can serve as an outstanding example of one of the earliest industrial processes. Peirce Mill is a key cultural resource in Rock Creek Park and a popular visitor site since its restoration in 1935. Although the Rock Creek Park staff developed an educational program for schools entitled Milestones to Millstones, the milling machinery has not been repaired since it failed in 1993. (rocr3030.011)

**Response:** Peirce Mill management is not a component of the general management plan. The approach for managing this facility has already been determined and would not change regardless of the alternative selected in the general management plan.

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

The recommendation from the report, which will be implemented by the National Park Service, is to rehabilitate Peirce Mill to provide a historically accurate representation of a typical mill complex in the region. This will include restoring the milling machinery to a fully operable condition. However, because the mill race was relocated away from the site many years ago, it will not be possible to restore operation of the mill using water power. The landscape of the complex will be rehabilitated to retain the historic character while allowing continued use. The final general management plan was revised to better clarify the upcoming action for Peirce Mill.

### Issue 2: Was Money Expended Recently on the Peirce-Klingbe Mansion Misspent?

**Representative Comment 1:** I believe the Park Service has spent several tens if not hundreds of thousands of dollars redoing Klingbe Mansion and now they seem to be wanting to talk about moving the administrative facilities up in either the nature center of the maintenance yard. (rocr3121.001)

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**Response:** The Peirce-Klinge Mansion is listed in the National Register of Historic Places and, under NPS policy, must be preserved. Virtually all of the funds spent on this building would have been spent for its protection and rehabilitation regardless of the use occurring within. The new use for the Peirce-Klinge Mansion must be compatible for the preservation of the building and will incorporate the preservation upgrades made to date.

## TRADITIONAL PARK CHARACTER AND VISITOR EXPERIENCE

### Issue 1: Visitors Currently Avoid Weekday Park Use Because of Traffic

**Representative Comment 1:** In recent years as we know, Beach Drive has become little more than a commuter highway with car after car speeding through the park. Five days each week the park is inundated with cars and clogged with traffic, particularly during rush hour. Only once have I ridden a bicycle on Beach Drive during rush hour, and I'm not sure whether it was out of curiosity, bravery or stupidity, but I haven't ventured back there since during rush hour. It's a hostile environment. It's an unsafe environment. You have a narrow road with a steady stream of cars speeding through—actually intermediately speeding and stopped and backed up for a considerable distance at the many stop signs along the way. (rocr3113.002)

**Representative Comment 2:** Despite all of the park visitors and people who love the park, I've learned over the years that lots of folks barely know its exists. And it's clear to me that the main reason for this is the incessant weekday car traffic. It's this traffic that leads so many people to think of the park and refer to it as simply the parkway. I think that's why it's practically deserted on weekdays. You just don't think about taking a walk or a bike ride along a parkway which by definition is meant only for cars. And you certainly don't want to take your kids there. (rocr3132.006)

**Representative Comment 3:** During weekdays, the high speed of traffic on Beach Drive, the many sharp turns in the road, and the resulting noise and pollution render that portion of Beach Drive far too hazardous for bicycling and unpleasant for walking or hiking. As a result, when we go out during the week, we have been forced by the traffic to avoid the Park entirely and to use only neighborhood streets. (rocr2894.002)

**Representative Comment 4:** The presence of cars on the upper portions of Beach Drive make any other use of that roadway impossible. The road is designed as a scenic drive. There are nine blind curves simply between Broad Branch and Military Road. If you are a cyclist, a rollerblader, a runner, you never know what's coming around one of those blind curves. It means that there are very few people who use that part of the park for recreation during the week. I hear people commenting who would use it. I've been down there. I've seen it. No one is running on that road. No one is using it for bicycling. Well, there's a reason. It's too hazardous. (rocr3066.003)

**Response:** The "Traditional Park Character and Visitor Experience" impact topic in the "Affected Environment" section of the final environmental impact statement was modified to include these types of perceptions among visitors.

## **Issue 2: Many People Would Use Park on Weekdays**

**Representative Comment 1:** Now I know that some would say that no one would use the park on weekdays and that just having a weekend park is fine. Well, I think that's ridiculous. There are hundreds of thousands of area residents who could and would be using it during the week if it were made accessible and attractive. I'm thinking self-employed people who make their own schedules, parents who stay at home with their young children, students, retired people, folks in the tourist and restaurant trades who work weekends and get weekdays off. So there's no shortage of people who would use the park if it were made available to them. The incessant car traffic excludes people from the park. (rocr3132.006)

**Response:** Comment noted.

## **Issue 3: What Is the Demand for Weekday Use?**

**Representative Comment 1:** In reading the Draft Plan, however, I found no clear evidence of the need for closing Beach Drive during the week. Indeed, there is no empirical data set out indicating, importantly, how many non-motorists would actually use the facilities during the week. (rocr0571.001)

**Representative Comment 2:** Most people work during the day. Was a survey conducted as to how many persons (automobilists, bicyclists, hikers~ joggers) would use this road during the day for recreational purposes only? How many NOW use this area during the day for recreational purposes? (rocr2822.002)

**Response:** The National Park Service has not performed counts of current weekday nonmotorized recreation use on Beach Drive. However, current weekday counts of participants in these activities would not be a good indication of park use if Beach Drive closures were implemented, just as the current heavy weekend use of Beach Drive for nonmotorized recreation would not continue if weekend management of Beach Drive was changed to allow traffic.

The National Park Service also has not conducted studies to estimate nonmotorized recreation use that would result from closures of Beach Drive to motorized vehicles. However, it is expected to be substantial, based on the more than 2,000 comments of support that the National Park Service received for Alternative D and the types of information that are included in comments for Issues 1 and 2.

## **Issue 4: How Much Traffic Would Be Diverted by Beach Drive Closure?**

**Representative Comment 1:** There is no indication of how many motorists would be precluded from using Beach Drive during the periods of weekday closures. (rocr0571.001)

**Representative Comment 2:** It would seem mandatory that should ANY additional road closures take place that NPS measure the number of displaced vehicles and additional traffic congestion on near by streets. (rocr1523.002)

**Response:** Traffic counts conducted by the National Park Service in June 2004 determined that mid-day closures of Beach Drive between Joyce Road and Broad Branch Road would divert

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about 330 vehicle trips per hour from Beach Drive to other roads. This information was added to the final environmental impact statement.

### **Issue 5: Visitors Currently Avoid Weekday Park Use Because of Concerns about Personal Safety**

**Representative Comment 1:** In all the years I have lived in the city, I have never walked or cycled alone in the Park. I am afraid for my safety as a woman alone. As a woman, now in her senior years, I am even less likely to go walking in the Park. (rocr0798.002)

**Response:** The final environmental impact statement was modified to include a section on public health and safety, which includes an analysis of effects on personal safety. The “Affected Environment” section was revised to include data on crimes against persons (murders, rapes, and assaults) that occurred in the park over the 3-year period of 2001 through 2003.

### **Issue 6: Cyclists Use Park Roads Because the Paths Are in Poor Condition**

**Representative Comment 1:** I want you to not lose sight of a massive problem for cyclists and other recreational users in the park. Specifically the multi-use paths, particularly south of Peirce Mill have been deteriorating for decades. Many sections are now narrow, they’re potholed, broken by invading roots and covered with mud. These bike paths are not only a disgrace to the park and to the city, they’re positively dangerous. They are far below national standards.

If these deteriorating multiuse paths are not improved as part of this plan, or whatever plan emerges, there will be a growing movement among cyclists particularly to ride exclusively on the road. This can already been seen on the roads even where they’re running to parallel to trails. (rocr3118.002)

**Response:** Comment noted.

### **Issue 7: Describe Use of the Park for Birding**

**Representative Comment 1:** Birdwatching is the most rapidly growing outdoor activity in the USA (according to a Fish and Wildlife Service 2002 report), while activities such as biking are declining. Yet the plan speaks of improving facilities for bikers, while no mention is made of birders. (rocr0644.004)

**Representative Comment 2:** On any given day during the peak of migration, dozens of 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. (rocr3025.003)

**Representative Comment 3:** Unlimited automobile traffic adversely affects other traditional uses of the Park also. Over the past couple of months, I’ve asked the birdwatchers who congregate along Glover Road in the spring and fall whether automobile traffic in the Park interferes

with their activities. They emphatically answer “yes,” saying it makes certain key bird watching areas completely unusable during the week. (rocr2923.003)

**Response:** Information on birding in Rock Creek Park was added to the “Affected Environment” section of the final environmental impact statement.

#### **Issue 8: Describe Use of the Park for Canoeing and Kayaking**

**Representative Comment 1:** There is a long tradition of boating on Rock Creek. While float permits were required for several years, the permit restriction was lifted in 1986. Since then American Whitewater estimates that a few thousand boaters have floated through Rock Creek without incident. (rocr3022.005)

**Response:** Information on canoeing and kayaking in Rock Creek Park was added to the “Affected Environment” section of the final environmental impact statement.

#### **Issue 9: There Are Many Components to Park Character and Visitor Experience**

In addition to the items described previously for this impact topic, commenters described elements of the traditional park character and visitor experience at Rock Creek Park.

**Representative Comment 1:** We use Rock Creek Park as our outdoor classroom. Almost every month of the year we lead environmental education programs in Rock Creek Park. (rocr3107.002)

**Representative Comment 2:** The people I see using the park during the day are eating their lunch in their car or standing out side their cars on the edge of the pull off or walking nearby enjoying the outdoors. Most bicyclists on the other hand seem to young men in racing gear going as fast as possible, not looking at the scenery, indeed appearing as if they are using Beech Drive as a speed way. (rocr2870.003)

**Representative Comment 3:** Getting to and from the picnic areas also requires a car if you are going to have small children, elderly, or infirm people attending your function. Not to mention getting coolers, food, athletic equipment, etc. to those areas. (rocr1096.0020)

**Representative Comment 4:** You would think from these comments that roads are a very scarce commodity, that we don’t have any roads, and that wherever you go we can’t find any roads. As it is, there’s hundreds of roads. What is very rare and very precious is a place where people can bike, walk, or sit without having lots of traffic. (rocr3061.002)

**Response:** Under any of the alternatives, picnickers would continue to have access to the picnic groves by automobile, just as they currently do on weekends.

## REGIONAL AND LOCAL TRANSPORTATION

### Issue 1: Other Data Are Available that Should Be Used

**Representative Comment 1:** Instead of “updating” or revising its website, the National Park Service should be updating the traffic studies that it used to consider the impact of its road closure proposals on the adjacent neighborhoods and the National Park Service should be analyzing how its proposed road closures will be endangering the residents in these neighborhoods. It is unreasonable for the National Park Service to assume that the traffic diverted from Beach Drive would somehow magically all end up on 14th or 16th Street, Connecticut, Wisconsin or Massachusetts Avenues. At the end of May and beginning of June 2003 the MNCPPC performed a traffic study in our neighborhood. This study shows that between 9 a.m. and 3 p.m. during the weekdays, 670 cars travel on Daniel Road; however, during those same hours on Saturday the number of cars jumps to 970. The closure of Beach Drive on Saturday accounts for all of this increase. The MNCPPC study also finds that at least 1500 cars use Beach Drive at the Maryland line between 9 a.m. and 3 p.m. during the weekday. (rocr0764.003)

**Response:** A supplemental traffic study was conducted by the National Park Service in June 2004. The results were included in the final environmental impact statement.

The traffic counts referenced in this comment were obtained from the Maryland-National Capital Park and Planning Commission and were included as Table 17 in the final environmental impact statement. The data do not indicate how much of the increase can be attributed to the weekend closure of Beach Drive in Rock Creek Park and how much is related to neighborhood residents running errands or conducting activities on weekends.

**Representative Comment 2 from Maryland Department of Transportation:** MD 410 (East-West Highway) intersects Beach Drive and is the closest State road to the affected area. The average daily traffic (ADT) for MD 410 near Beach Drive is 31,600 vehicles per day (VPD). The ADT on Beach Drive is approximately 5400 VPD at the State line which is one mile south of MD 410.

Although some the National Park Service’s proposals may significantly impact commuters and Washington, DC streets, we do not anticipate any impacts to State roads. (rocr2983.002 and .003)

**Response:** This information was added to the final environmental impact statement.

### Issue 2: Traffic Statistics Are Questionable

**Representative Comment 1:** And then there is a question about your traffic statistics which you have to deal with somehow. You always say that there are 9,000 cars using Beach Drive on weekdays. However, in the traffic study from 1990 they say then there are 9,000 cars using Beach Drive. So either there is no increase in traffic on Beach Drive in 14 years or there’s something wrong with the statistics. (rocr3108.006)

**Response:** Traffic counts were updated in the final environmental impact statement using the most current data available. Within the park, these included traffic counts from a June 2004 study

conducted by the National Park Service. The most recent data for roads outside the park consisted of 2001 traffic counts from the District of Columbia, Department of Transportation.

A comparison of the versions of the Average Weekday Traffic Volumes map in the draft and final environmental impact statements indicates that changes in traffic in the study area have not been uniform or predictable. While traffic increased on some road segments, it remained constant or decreased on other road segments. This was observed in the count data both from the National Park Service and the District of Columbia, Department of Transportation. It is beyond the scope of the environmental impact statement to determine why decreases in automobile traffic counts occurred on some road segments in the park and surrounding area.

### **Issue 3: Augment Descriptions of Traffic in the Park**

**Representative Comment 1:** Another concern is that the GMP does not appear to address the existing traffic hazard for weekend recreational users in between the two northernmost Beach Drive recreation zones. For a few hundred yards, recreational users must share the roadway with motor vehicle traffic crossing the Park on Wise Road. (rocr3121.006)

**Representative Comment 2:** Commercial traffic is not allowed but travels there with regularity, trucks are not allowed but travel with regularity, school buses, county vehicles, taxicabs, etc. (rocr1206.002)

**Representative Comment 3:** On an almost daily basis I commute on Beach Drive north of Military Road on a bicycle between my home on Kanawha Street and office in Bethesda. Even though I am going against the majority of rush hour traffic in the morning and afternoon/evening, I find the ride becoming increasingly dangerous. Friends who also commute on bicycles on this section with rush hour traffic find it even more dangerous.

Beach Drive is extremely narrow and curvy here. With the potholes and poor pavement conditions, cyclists cannot safely stay very close to the edge of the roadway, making it even more difficult for cars to pass. Cars cannot pass cyclists without crossing the center line. In the rush to pass cyclists, most drivers inevitably become agitated and try to swerve around cyclists before crashing with oncoming traffic. Motorists behind the first car behind a cyclist may not see what is causing the slowdown and begin honking their horns and yelling. The “bicycles in roadway” signs provide little security for cyclists or explanations to motorists. (rocr2901.006)

**Response:** The final environmental impact statement was modified to include additional information on traffic in the park and the perceptions of park users concerning traffic.

### **Issue 4: Augment Descriptions of Traffic On Surrounding Thoroughfares**

**Representative Comment 1:** Report seems flawed. References Beach Drive at Upshur. Level of Service. According to the report, Blagden was under capacity in 1990. We may take issue with that. When you study the traffic validation study at page 347, it appears that traffic is being diverted from Joyce Road and roads like 16th are picking up volume. (rocr2769.013)

**Representative Comment 2:** 16th Street and Connecticut Avenue. Both are already experiencing severe congestion in both rush hours and unacceptably poor levels of service at several key inter-



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sections that are already major bottlenecks, and that is under current conditions. Imagine the travel conditions that are projected on these major arterials between now and 2020. (rocr0584.002)

**Response:** Comments were noted.

### **Issue 5: Augment Descriptions of Traffic in Surrounding Neighborhoods**

**Representative Comment 1:** On Saturdays and Sundays, Daniel Road becomes the thoroughfare for people who would otherwise be going through Beach Drive. The amount of traffic that is presently diverted onto Daniel Road because Beach Drive is closed is very substantial. (rocr3058.001)

**Representative Comment 2:** These residents already contend with cut-through traffic on the weekends, due to the closure of Beach Drive. (Senator Barbara A. Mikulski, rocr2974.001)

**Representative Comment 3:** Weekend closure combined with annual increases in DC traffic already impact Rollingwood. Our neighborhood streets, particularly Daniel, Wyndale, Greenvale, Pinehurst Parkway, Woodbine, Leland and Brookville Road already experience "cut through" vehicles searching for alternate routes from Beach Drive when it is closed or crowded. (rocr2856.002)

**Representative Comment 4:** As a child, I could walk safely to commercial areas in Takoma Park and Rockville. By the last couple of decades, that's become a risky undertaking, even for a cautious adult. But worse yet, even many of our neighborhoods are risky for pedestrians. My own neighborhood (in the North Four Corners area of Silver Spring) was so heavily used by impatient cut-through drivers that I felt I needed a reflective vest on morning or evening jogs. Happily, the county council has recognized this problem and made some significant improvements with various "traffic calming" measures.

One of the most hazardous strips of road in the county is the Beach Drive/Jones Mill Road strip from the D.C. line out to the Beltway: narrow, curvy, poor visibility, and fast moving traffic. The traffic volume is still relatively light in midday, although the speed is relentless. I usually drive along Beach Drive at 35 to 40 mph -- that's slower than most of the traffic, and if I try driving more slowly I risk creating exceptionally dangerous enraged drivers. (rocr0550.002)

**Response:** The final environmental impact statement was modified to include additional information on traffic in neighborhoods around the park and the perceptions of area residents concerning traffic.

### **Issue 6: There Is Little Need for Diverted Park Traffic to Enter Neighborhoods**

**Representative Comment 5:** Four major parallel (to Beach Drive) routes for autos (16th Street, Georgia Avenue, Connecticut Avenue, and Wisconsin Avenue) as well as several minor routes (Oregon Avenue, Ross Drive, Glover Road, and Broad Branch to name a few) also serve as alternatives, and Metro's red line parallels the Park on both the east and west. It is hard to imagine a situation in which more alternatives to driving on a given road exist. The few people traveling on

Beach Drive during the mid-day period can be diverted to these alternatives, avoiding local neighborhood streets entirely. (rocr2925.018)

**Response:** Comment noted.

## COMMUNITY CHARACTER

### Issue 1: Update Population Characteristics for Surrounding Areas

**Representative Comment 1:** Page 155 and Table 16 on Page 156. Please update in two ways: (a) using the now-available Census 2000 data instead of Census 1990 data used in the draft; and (b) recognizing the change in Ward boundaries (effective 2002, because of redistricting). [The DC Office of Planning can help you re-organize the data by the current Wards.] Without these two changes, the data would confuse and mislead (instead of guiding and clarifying) during the years when the GMP will actually be used. (rocr3029.003)

**Response:** The final environmental impact statement was updated to include data from the year 2000 census. The data are now presented by zip code tabulation area rather than political ward boundaries.

## PUBLIC HEALTH AND SAFETY

### Issue 1: Address Safety for Cyclists

**Representative Comment 1:** I'm a pretty active cyclist and I'm one of those people who is actually crazy enough to ride a bicycle north from my house on Beach Drive up to the Capital Crescent trail at East West Highway during rush hour because I now work in Bethesda. It's really quite dangerous. For a car to pass me going north on Beach Drive or a car to pass a commuter—a cycling commuter coming south on Beach Drive, they really have to go across the yellow line. (rocr3121.004)

**Representative Comment 2:** I routinely observe behavior by automobile drivers in the Park that puts traditional/recreational Park visitors at risk. These behaviors include unchecked speeding, failures to yield right-of-way to pedestrians and bicyclists walking across crosswalks and intersections, failures to stop at stop signs and passing at excessive speeds and in dangerous locations. In addition, as a runner and bicyclist I've had bottles and other objects thrown at me, I've been screamed at many times to "get off the road," I've had cars swerve at me and stop suddenly to block my path. (rocr2923.002)

**Response:** "Public Health and Safety" sections were added to the final environmental impact statement under "Affected Environment" and "Environmental Consequences." They include current statistics on traffic safety, including accidents involving cyclists and pedestrians, and analyze impacts of the alternatives on the safety of visitors, including those participating in nonmotorized recreation on park roads.

## AFFECTED ENVIRONMENT

### **Issue 2: Address Safety of Visitors Using the Park**

**Representative Comment 1:** There were 14 women attacked in Washington, D.C. while blading, walking, jogging in a year starting in September 2000 on our trails and roads and paths. Upper Beach Drive during the mid-day, mid-week closures would give me a big, wide open, safe place to run and walk with my fellow cyclists, baby joggers and others. On the weekends, it's a really comfortable place to run. (rocr3047.003)

**Response:** The "Public Health and Safety" section that was added to the final environmental impact statement include current statistics on crimes against persons (murder, rape, and assault) in Rock Creek Park and the Rock Creek and Potomac Parkway and analyze impacts of the alternatives on the personal safety of visitors.

## ENVIRONMENTAL CONSEQUENCES

### **Issue 1: Many Data That Supported Impact Analyses Are Out of Date**

**Representative Comment 1:** I do not intend to address with specificity the obvious problems in the draft plan with regard to the age of the National Park Service's studies. (rocr0764.010)

**Response:** As described in the Consultation and Coordination section, the general management planning process started in 1996. Several studies were conducted at that time to support a planning effort that was expected to be completed within about 3 years. However, the controversial nature of planning for Rock Creek Park resulted in numerous delays and some of the data became outdated.

All data were reviewed in the process of preparing the final general management plan. It was determined that updated traffic information was needed, and a new traffic study was conducted in June 2004. Government agencies and others were contacted for updated information in other areas. All of the data in the final environmental impact statement are sufficiently current to support the evaluation of impacts of the alternatives.

## AIR QUALITY

### **Issue 1: General Comments on Air Quality Effects**

**Representative Comment 1:** Diverted stop and go traffic will release increased emissions in neighborhoods. (rocr3037.000).

**Representative Comment 2:** Given the increasing congestion on our roads, closing a major through-way would be detrimental to us all. It would increase the emissions levels that sitting in traffic would cause. (rocr0651.002).

**Response:** Comments were noted.

### **Issue 2: The BEQ Had Concerns about the Analysis**

All of the comments under this issue are from the District of Columbia, Department of Health Environmental Health Administration, Bureau of Environmental Quality (BEQ) (rocr1736.002)

**Comment 1:** The draft document contends that measured carbon monoxide (CO) concentrations in the park areas drift from Washington, DC proper, consequently CO emissions is an area-wide problem that could not be worsened by Rock Creek-related projects.

## ENVIRONMENTAL CONSEQUENCES

The BEQ disagrees because the incremental contribution of localized projects to CO hotspots is a local concern. Consequently, the BEQ takes the position that proper air resource management will improve the local air quality, and by extension the overall regional situation. Thus, the incremental levels of CO pollution should not and must not be ignored.

**Response:** The discussion of air quality was clarified in the final environmental impact statement. The draft acknowledged that “Carbon monoxide is a tailpipe emission, and local monitoring can indicate problem areas.” Indeed, the air sampling program commissioned by the National Park Service in and around Rock Creek Park (Robert Peccia and Associates *et al.* 1997) was intended to identify possible hot spots of local concern.

The draft environmental impact statement that “some of the carbon monoxide detected in the park drifts in from the city” was based on the detection, on three sampling occasions, of carbon monoxide concentrations at the golf course monitoring location that were higher than carbon monoxide concentrations at monitoring sites at major intersections near the park. The golf course sampling location had been chosen in an effort to establish background (unaffected by local traffic) levels of carbon monoxide within Rock Creek Park. The golf course could have high readings only if carbon monoxide had been transported (drifted) to the golf course from the location where it was generated.

The statement “carbon monoxide is an area-wide air pollutant” was changed in the final environmental impact statement to indicate that “elevated concentrations of carbon monoxide were detected at all of the sampling locations.”

The National Park Service concurs that incremental reductions in carbon monoxide emissions will help improve air quality both locally and regionally. A statement regarding the NPS’ intent to work with others at the federal, state, and local levels in the development and implementation of air pollution control approaches that will remedy existing, and prevent future, impacts on resources and values from human caused air pollution was added to the section entitled “Service-wide Mandates and Policies.”

**Comment 2:** In analyzing the impacts on air quality of the park management plan, the draft document did not analyze dust and smoke emissions because the occurrences were believed to be both infrequent and of small magnitudes that overall contributions to the park air quality is negligible.

While BEQ recognizes variability in levels of source emissions, this agency advises that proponents of projects thoroughly evaluate contemplated activities for air quality impacts. This of course is best done during the planning phase of a development, as is currently the case. Consequently, project components such as Administration and Operations which might involve: (1) New Construction, (2) Alteration of traffic pattern, (3) Rehabilitation / Modification, (4) Installation of a HVAC system, etc, will require BEQ approval.

**Response:** An environmental assessment for compliance with the National Environmental Policy Act would be prepared prior to implementing any of the components in the general management plan that would involve construction. Each environmental assessment, which would be prepared during the specific project’s planning phase, would evaluate the air quality impacts of that contemplated activity and its alternatives, plus the cumulative impacts Approval from the District of

Columbia, Department of Health, Air Quality Division would be obtained for the activities, such as those listed above, over which it has jurisdiction.

**Comment 3:** The air quality analysis was based on 1996 air quality monitoring. The CO concentration determined in 1996 was based on a 1990 Average Weekday Traffic Volume. The consultant, Robert Peccia & Associates et al., projected this 1996 data to the year 2020 to arrive at a number that formed the basis for the air quality impact analysis associated with the Rock Creek Park and Rock Creek Potomac Parkway project.

*It is the opinion of the BEQ that data validity is a concern and requires justification.*

The BEQ has two concerns with this methodology [which used 1996 monitoring data and 1990 traffic data]:

- The use of a seven (7) year old air quality monitoring data casts doubt whether the modeling prediction would actually capture current air quality conditions in the Rock Creek Park environs.
- A similar argument can be made in the adoption of a 1990 Average Daily Traffic Volume in the projection of CO vehicular loadings for the year 2020.

Project components such as Administration and Operations which might involve: (1) New Construction, (2) Alteration of traffic pattern, (3) Rehabilitation / Modification, (4) Installation of a HVAC system etc, may be subject to the Environmental Impact Screening Form process, using the latest available data.

**Response:** The data used to calculate impacts in the final environmental impact statement were updated.

- The most recent average traffic counts available for city streets were obtained from the District of Columbia, Department of Transportation map entitled 2001 Traffic Volumes. For locations inside Rock Creek Park, average daily traffic counts were measured in June 2004.
- Carbon monoxide monitoring data were obtained from the District of Columbia, Department of Health, Air Quality Division for their monitoring site at the Verizon Telephone building at 21st and K Street, N.W., which is 3.2 miles from the headquarters of Rock Creek Park. Data for 2001 and 2002, which best correspond with the dates for most of the traffic data (2001) were used.

When project components that include the activities listed in the comment are in the detailed planning stage, the National Park Service will coordinate with the Air Quality Division regarding the need to implement the Environmental Impact Screening Form process. The most current data available at that time will be used in that analysis.

**Comment 4:** The document under review further suggested that the traffic modeling for the year 2020 did not identify any changes in regional traffic arising from management actions at Rock Creek Park, therefore the air quality analysis focused on incremental changes at each roadway intersections.

## ENVIRONMENTAL CONSEQUENCES

*The BEQ believes that this approach is acceptable provided that the indicated traffic model has merits.*

**Response:** The traffic analysis was performed using the transportation model of the Metropolitan Washington Council of Governments, which is the agency in the Washington, D.C. area that is responsible for regional planning and traffic modeling. This model is well suited for assessing traffic impacts in and around Rock Creek Park.

**Comment 5:** Why were HOV-2 restrictions not considered with Alternative D? Page 62 states: “By the year 2020, with Alternative B commuter traffic along some portions of Beach Drive would routinely near gridlock conditions.” This would be the same level of commuter traffic as under Alt. D. While modeling may not reveal a significant difference in traffic within Rock Creek under HOV-2 restrictions, it seems that it is a necessary first step in encouraging individuals to carpool and for creating an impetus for other roadways to be classified as HOV-2 during commuting hours. Maintaining status quo would not, in the long-term, improve either air or water quality.

**Response:** Consistent with the letter from Washington, D.C. Mayor Anthony Williams that led to its development (the letter was included in Appendix D of the draft document), Alternative D was designed to implement weekday vehicular traffic restrictions only during non-rush-hour periods. In accordance with the intent of the mayor’s letter, Alternative D did not include high-occupancy vehicle restrictions. In the draft environmental impact statement, the effects of high-occupancy vehicle restrictions were considered in the analysis of Alternative A and Alternative C.

**Comment 6:** Also, the text on pg. 344 is confusing as to how estimates of HOV-2 usage were obtained. It states “consultant estimates of average auto occupancy for each trip purpose were utilized based on data collected within project study area during this study as well as from other similar urban areas.” Does this mean that the number of vehicles with greater than 2 individuals were counted as those that would use HOV-2 lanes? It does not seem reasonable to use figures obtained from Rock Creek when HOV-2 restrictions do not currently exist. Additionally, what are some of the modeling assumptions in regards to HOV-2--does the modeling assume that people would take other routes, rather than carpool, and this is why a reduction in volume would not be observed?

**Response:** Yes, the analysis assumed that all single-occupancy vehicles currently using the portions of Beach Drive that would be designated for high-occupancy vehicle use would have to use alternate routes during high-occupancy vehicle restrictions. It also considered that some drivers of commuter vehicles carrying two or more people and currently using the city street grid may relocate their trip to Beach Drive during the high-occupancy vehicle periods.

Based on the experience of other areas with high-occupancy vehicle restrictions, it was assumed that most people who currently are the sole occupant of a vehicle would take other routes rather than carpool. While some carpooling might be promoted by high-occupancy vehicle restrictions among the 700 drivers who currently use Beach Drive during the peak hour, reductions in area traffic volumes and air emissions would not be detectable compared to peak-hour traffic volumes on nearby arterials (for example, 2,800 vehicles on 16th Street, 3,400 vehicles on Connecticut Avenue, and 2,900 vehicles on Military Road) during the same peak hour.

**Comment 7:** Text: pg. 19 “The analysis showed that Alternative D is environmentally preferred by a close margin.”

*This is different than the text on pgs. 64-65, where it is stated that the environmentally preferred alternative is Alternative C. Need to clarify why D was selected.*

**Response:** The Bureau of Environmental Quality inadvertently received an intermediate document that erroneously identified the wrong alternative as environmentally preferred on pages 64 and 65. In the draft general management plan that went to the public, Alternative D was identified as the environmentally preferred on those pages. In the final general management plan, Alternative D is correctly identified as the environmentally preferred alternative.

### **Issue 3: Consider Air Quality Impacts in Surrounding Neighborhoods**

**Representative Comment 1:** NPS failed to perform environmental impact studies on neighborhoods surrounding the park. Surrounding neighborhoods will have increased emissions due to greater volumes of stop and go traffic. (rocr2999.010)

**Representative Comment 2:** The National Park Service fails to consider the environmental impact of the diversion of traffic onto neighborhood roads, which will increase the level of stop and go traffic. Residents adjoining the Park also will be forced to drive to the Park instead of walking through the neighborhood streets that would be made unsafe by any road closure. Therefore, the National Park Service ignores the strong likelihood that its road closure proposal will have a negative impact on the air quality of not only those adjacent neighborhoods, but also the Park itself. (rocr0764.009)

**Response:** The District of Columbia, Department of Health, Air Quality Division operates an ambient air monitoring network consisting of just six permanent air monitoring stations. Because concentrations of air pollutants disperse rapidly, air quality experts from the District of Columbia, Department of Health and U.S. Environmental Protection Agency have agreed that for protection of health and compliance with regulations, the data from the six sites provide an adequate representation of air quality for the entire district.

Traffic counts were obtained from the Maryland-National Capital Park and Planning Commission and added to the final environmental impact statement as Table 17. These data show that the average daily traffic count on Beach Drive north of the park is 5,700 vehicles. Traffic counts made by the National Park Service in June 2004 showed that 6,600 vehicles use Beach Drive north of Broad Branch Road on a normal weekday. These values represent the worst-case total pool of vehicles that would be available for diversion if segments of Beach Drive were permanently closed (Alternative C).

At the same time, the neighborhoods around the park are being affected by the rapidly dispersing pollutants from other roads in the area. Values from the updated Average Weekday Traffic Volumes map in the final environmental impact statement for the major highways closest to the north part of the park include:

East-West Highway	33,500 vehicles per day
Connecticut Avenue	35,000 vehicles per day



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16th Street	36,000 vehicles per day
Military Road	20,000 vehicles per day

Similar traffic levels on Wisconsin Avenue, Nebraska Avenue, and Georgia Avenue also produce pollutants that disperse into the neighborhoods around the park.

From these counts, was calculated that air pollution from all divertible traffic on Beach Drive represents only about 5 percent of the air pollution that currently is affecting neighborhoods from the closest arterials. Changes in air pollutant levels in the neighborhoods that would result from management changes of Beach Drive would not be measurable compared to air pollutant levels in the area from other traffic in the area (negligible impact). Therefore, there was no need for a more detailed analysis on effects of the alternatives on air quality in the nearby neighborhoods.

Traffic data from the Maryland-National Capital Park and Planning Commission show that during mid-day period on Saturdays, traffic on Daniel Road increases by 300 vehicles over 6 hours compared to the same period on weekdays. This is less than 1 vehicle per minute. It is unlikely that this level of increase would influence neighborhood residents to use automobiles rather than walking if they wanted to access the park.

### **Issue 4: Beach Drive Closures Would Change Automobile Emissions Locally**

**Representative Comment 1:** Additionally, more cars traveling, stopping and starting throughout our neighborhood will add exhaust emissions, adversely impacting our environment. (rocr2856.004)

**Representative Comment 2:** I favor the "Alternative C" plan of action to help eliminate the car exhaust fumes and traffic through the park at all times of day and night, even if it means I must change some of my driving habits. (rocr2753.002)

**Response:** As described in the response to Issue 3, air pollutants disperse rapidly, so that just six monitoring sites provide an adequate representation of air quality for the entire district for the purposes of protection of health and compliance with regulations. As a result, the traffic management components of the alternatives would not have a measurable effect (negligible impact) on the air quality of the park or surrounding neighborhoods.

### **Issue 5: Air Quality Impacts Should Have Been Evaluated for Plants**

**Representative Comment 1:** Measuring carbon monoxide levels for impact on people and wild animals is good. But animals can move and are harder to find. Plants do not move as animals do and they are the better indicators of this type of environmental damage. Plants are the homes and food of animals. Components of smog such as ozone, aldehydes, gaseous fluorides, and sulfur dioxide are better indicators. Horace Wester (plant pathologist) and Maurice Sullivan (research biologist) of the National Capital Region reported on damage to plants in the parks from ozone and sulfur dioxide in 1970. Part of the Rock Creek and Potomac Parkway is included in their observation area. An investigation of the effect of automobile exhaust on the "timber" should have been done before considering different traffic patterns. (rocr3018.003)

**Response:** National Ambient Air Quality Standards were established to protect environmental components, including plants, as well as human health. None of the alternatives would result in changes the ability of the area to meet any of the National Ambient Air Quality Standards. Therefore, the analyses that were performed were adequate to support the impact evaluation at the broad planning level represented by a general management plan.

#### **Issue 6: Beach Drive Closures Would Increase Air Emissions**

**Representative Comment 1:** We would now have to take longer trips in addition to all the other cars that will have prolonged commutes due to restrictive use of Beach Drive. Has an environmental impact study been done to determine the pollution due to additional time on the roads? (rocr2853.004)

**Representative Comment 2:** Cars will be forced onto the major north south arteries where they will emit far more pollution as they idle at stop lights and add to the congestion. (rocr2787.002)

**Representative Comment 3:** Won't speed bumps slow traffic to the point of creating more congestion and pollution? (start/stop over & over) (rocr0484.005)

**Representative Comment 4:** Apart from the crawling traffic that the closure of Beach Drive will create in our community, our neighborhood will suffer a resulting environmental pollution problem. On 16th Street, for example, rush hour traffic is a major source of pollution. Closing Beach Drive will add to that pollution overall in our neighborhood and throughout the city. (rocr3085.003)

**Response:** A traffic study was conducted in June 2004 to determine the effects of closing Beach Drive between Broad Branch Road and Joyce Road. The study found that some of the travel routes that involve Beach Drive are more time-consuming (and, therefore, more air emissions producing), even during the rush hours, than travel routes between the same points that avoid Beach Drive. Therefore, management actions that diverted automobile traffic from these Beach Drive routes could slightly reduce air emissions. However, this could be offset by the slight increase in congestion during rush hours on other roads that would result from the diverted traffic.

None of these changes would be measurable compared to air emissions occurring throughout the area. Based on the threshold criteria on page 165 of the draft environmental impact statement, changes in air emissions because of changes in the management of Beach Drive would be negligible.

#### **Issue 7: Need to Better Consider Decisions in a Regional Context**

**Representative Comment 1:** The Washington, D.C. metropolitan region is already an air quality non-attainment area. Additional curtailment of vehicle traffic on these public park land roads will exacerbate air pollution throughout all the areas surrounding the park. The US Park Service and the Department of the Interior must consider regional impacts when making park usage decisions. Traffic diverted off the park roads will be forced onto already overcrowded streets in the region. The consequences of more traffic on already overcrowded streets can only worsen congestion, further lower air quality. (rocr0711.003)

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**Response:** Air quality would not be affected by the selection of park management alternatives, because the alternatives would relocate traffic but would not substantially change traffic volumes or extend the duration of trips. As described in the response to Issue 6, the June 2004 traffic study conducted by the National Park Service demonstrated that some trips through the park, even during rush hours, could be made more time-efficiently by not using the park. As a result, closing parts of Beach Drive would result in little change in air emissions.

### **Issue 8: Park Can Be an Important Contributor in a Regional Context**

**Representative Comment 1:** The analysis fails to look at the possibility that as a regional air quality improvement, the regional governments here might get together and say we actually want to encourage people to start commuting more by bicycle, get off of the road, and use more mass transit. We're going to create a better set of bike trails for which Rock Creek Park certainly would be a central space for that.

If they did that and if that was part of an overall plan to improve air quality in the region, which we all know needs to be done - we have code orange and code red days where it's unsafe to go outside. The Park Service should factor that in their environmental analysis. If it turns out that Rock Creek Park is a significant component of an overall air quality improvement plan, that needs to be taken into account. (rocr3068.003)

**Representative Comment 2:** In analyzing Alternatives C and D, the draft GMP finds that the effect on air quality would be negligible, and that encouraging some commuters to use bicycles "would result in a beneficial but negligible effect on the regional air quality." (p. 229. 256). This analysis is flawed, because it fails to take into account the potential role of the Park as part of an overall regional plan to improve air quality in the region.

Because the Park constitutes an important element of a regional network of bikeways (including both bike-friendly streets and paths such as the Capital Crescent Trail and Metropolitan Branch trail, which are under development), it would be wrong to assume that encouraging bicycling has a negligible impact on air quality.

The metropolitan D.C. area is suffering from an air pollution crisis. The city is becoming unlivable during much of the summer months, with frequent code red and code orange air quality alerts. It is quite possible that regional authorities will take action to deal with this problem by getting a substantial number of cars off the roads. Increased bicycling would be an integral part of the solution. It will not be enough by itself, but together with increased Metro use, carpooling, and other factors, it can make the difference to reach a solution to our crisis.

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

**Response:** The National Park Service understands that incremental steps in reducing air emissions are important and that providing a north-to-south linkage is an important component in the regional network of bikeways. However, it is unlikely that the implementation of Alternative C or Alternative D would cause large numbers of residents to change from automobiles to bicycles as a primary form of transportation such that a measurable decrease in the concentrations of air pol-

lutants would be detected. Thus, based on the threshold criteria on page 165 of the draft environmental impact statement, the beneficial effect would be negligible.

In the final general management plan, the preferred alternative was modified to stress flexibility and adaptive management in its implementation. If regional governments were to develop a transportation plan that calls for substantially increased bicycling and relies on Rock Creek Park for a significant element of that increase, the National Park Service would be willing to engage in discussions to determine how that goal could be achieved.

#### **Issue 9: Ozone Effects Should be Considered**

**Representative Comment 2:** We are concerned to be assured of the plan's assessment that ozone levels will not be effected. As we fear that ozone may settle in the lower levels of the Park. (rocr3139.006)

**Response:** Air quality studies conducted for the National Park Service by Robert Peccia & Associates, *et al.* demonstrated that air pollutants, including ozone, do not settle in the Rock Creek valley within the park. Conversations with experts from the District of Columbia, Department of Health, Air Quality Division reconfirmed that ozone is a regional problem that is requiring coordinated action throughout the eastern seaboard.

#### **ROCK CREEK AND ITS TRIBUTARIES**

##### **Issue 1: The BEQ Had Concerns about the Analysis**

All of the comments under this issue are from the District of Columbia, Department of Health Environmental Health Administration, Bureau of Environmental Quality (BEQ) (rocr1736.003)

**Comment 1:** We are particularly concerned with an issue that is not dealt with in the document - routine maintenance of the Park. There are several invasive species of plants and animals that are having a devastating effect upon many areas in and outside of the Park. Because the Park is surrounded by urban areas with impervious surfaces, storm flows have and are causing stream channel instability and a loss of habitat. Both of these issues are operation and maintenance issues. We believe that O&M budgets need to be increased in order to protect and improve the Park ecosystem.

**Response:** Comment noted.

**Comment 2:** *Regarding the Alternative A analysis, which stated that traffic reductions on Beach Drive would reduce the loadings of pollutions that were being washed off the road into the creek:*

The traffic studies did not find that within the Rock Creek watershed traffic would substantially decrease under any of the alternative—"The traffic modeling for the year 2020 did not identify any changes in regional traffic because of management actions at Rock Creek Park. Instead, the alternative would redistribute the same traffic volume through different roadways"(pg. 162). Automobiles within the watershed would still be releasing these pollutants, and while it is possi-

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ble that some would be intercepted/filtered by vegetation, most of these pollutants would eventually enter Rock Creek, and it is unlikely that pollutant levels would be noticeably lower.

**Response:** The thought was that Beach Drive, which runs parallel and is adjacent to Rock Creek, would particularly affect the water quality of the creek because there would be little opportunity for pollutants to settle out or be filtered out in transit. However, we concur with the comment. The level of impact was changed to negligible in the final environmental impact statement.

**Comment 3:** For the BMP practices, BEQ suggests that it be specified that native vegetation be used for ground cover and that the planting of riparian trees and no mow zone along portions of Rock Creek also be considered.

**Response:** Consistent with *Management Policies 2001*, the National Park Service uses native species in vegetation plantings. Exceptions occur only in localized, specific settings, such as cultural landscapes where plant communities reflect the character of the landscape that prevailed during the target historic period.

Some mowing is necessary to maintain historic vistas and visitor use areas along Rock Creek.

**Comment 4:** *Regarding the cumulative impact analysis:*

It is not clear how the alternative provides major and beneficial improvements to water quality, as the only primary change would be the use of BMPs at park facilities and during construction. As mentioned above, BEQ does not believe that reduction in traffic along the parkway would correlate to reduction in pollutants entering Rock Creek, as overall traffic numbers are anticipated to remain the same within the entire watershed. If the document is suggesting that Alternative A, in conjunction with other planned activities, would be beneficial the sentence should be reworded—“The incremental effects of the improvements, in conjunction with other planned WASA and Woodrow Wilson Bridge mitigation projects, would have a major and beneficial improvement to water quality”.

**Response:** The final environmental impact statement was changed to incorporate the suggested text and to clarify that these major, beneficial effects would result from many combined actions. In addition, the text on page 171 was changed to read “Compared to future conditions occurring under the alternative of no action (Alternative B), Alternative A would produce *negligible to measurable*, long-term improvements in the water quality and storm water hydrology.”

**Comment 5:** No mention is made in the Impacts on Rock Creek and tributaries or in the cumulative impact section on the impacts of tailpipe emissions on water quality via atmospheric deposition. Burning of fossil fuels has been known to increase nitrogen oxide (NO<sub>x</sub>) inputs to water. Reductions in tailpipe emissions would be beneficial to both air and water quality.

**Response:** As described in the BEQ’s comment 4 on air quality, the BEQ accepts the approach that there would not be any changes in regional traffic (and its associated tailpipe emissions) arising from management actions at Rock Creek Park, just incremental changes at individual roadway intersections as the traffic was redistributed. This same finding is the basis for BEQ’s Comment 2 on water quality, above. As a result, there would not be any changes in nitrogen oxide inputs to water between the action and no action alternatives.

## **Issue 2: Analyses of Impacts from Construction Are Inadequate**

**Representative Comment 1:** Trail widening, trail construction and relocation, and construction of new facilities in the park will affect resources and cause some loss of resources. The GMP needs to say this and not brush off these impacts by saying that BMPs will protect the resources from loss. (rocr2981.013)

**Response:** The analysis of impacts was reviewed and the findings are still considered accurate. No changes were made in the final environmental impact statement.

An environmental assessment for compliance with the National Environmental Policy Act will be prepared prior to implementing any of the components in the general management plan that would involve construction. Each environmental assessment, which would be prepared during the specific project's planning phase, would evaluate the effects on water quality and other impact topics, based on planning-level descriptions of facility locations, sizes, and mitigating measures. As part of this process, the National Park Service will provide opportunities for agency and public review and comment.

## **Issue 3: Need to Coordinate with Other Communities**

**Representative Comment 1:** On the question of excess water, it seems to me that as part of the management plan there has to be a direction to allow the staff to figure out and work out the problems and the solutions to ask the cooperation of the nearby communities both in D.C. and upstream, because if we don't ask we're not going to get. (rocr3135.001)

**Response:** The National Park Service's commitment to work with other agencies was included in the draft general management plan and environmental impact statement. In particular, see pages 16 through 19 and 169 through 171. Additional information on cooperative efforts to improve water quality through the NPS' participation in the Chesapeake Bay Program was added to the final general management plan and environmental impact statement.

## **Issue 4: An Additional Potential Pollution Threat Should Be Considered**

**Representative Comment 1:** Further, the recent decision by the Maryland Department of the Environment to issue a permit for an expanded horse stable operation at the Meadowbrook facility in the Rock Creek flood plain poses an additional potential pollution threat. (rocr0829.007)

**Response:** The final environmental impact statement was changed to include information on this facility.

## **Issue 5: Impact Analyses Are not Accurate**

**Representative Comment 1:** It is not correct to say that continuing current management practices will have no permanent and irreversible adverse effect on the natural environment. Not putting more effort into controlling storm water and other discharges into Rock Creek from outside the park will worsen the problems of accelerated erosion and changes in hydrology from excess loading during storms, as is stated in several places throughout this draft. This will impact vegeta-

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tion, wildlife, water quality, and many other natural resources. It cannot be assumed that there will be more cooperation among agencies than there has been in the past. There is no supporting evidence that BMPs will be implemented by other agencies (they haven't been in the past) or that the BMPs will have the desired effect. Conclusions should be that continuing current practices would have an adverse effect on all aspects of the environment. (rocr2980.005)

**Response:** The evaluation of effects on water quality (and all other impact topics) includes two components: a determination of the effects from this project (the general management plan) only, and an evaluation of the additive effects from this project with effects from other actions in the past, present, or reasonably foreseeable future. This latter category is included under the heading "Cumulative Impacts" in each impact topic.

The evaluations on irreversible and irretrievable commitments of resources at the end of the evaluation of each alternative apply to the impacts from the general management plan only. These evaluations do not apply to cumulative impacts, where conditions can deteriorate regionally even as efforts are made to improve the resources within park boundaries.

### **Issue 6: Provide More Information on Non-Point Source Control**

**Representative Comment 1:** Sections are distressingly sparse and uninformative. Any plans to address the constant problem of surface runoff and other non-point source pollution associated with allowing car traffic through the park are only vaguely described. (rocr0332.007)

**Response:** The general management plan includes a commitment to reduce non-point source pollution originating in the park, including automobile pollutants that are deposited on roadways and can be transported into streams. However, the details on how this commitment and the many other goals and commitments in the plan will be implemented are normally included in specific resource management plans.

As described on page 119 of the draft general management plan, the study entitled *Best Management Practices for Water Quality, Rock Creek Park* (URS Greiner Woodward Clyde 1999) identified roads and parking lots among the facilities that are sources of water pollution in Rock Creek Park. This report provided details on best management practices to remediate or prevent this pollution. The National Park Service has been implementing the recommended best management practices and will continue to do so.

### **Issue 7: Address Leaking Underground Storage Tanks**

**Representative Comment 1:** The Berger Report on Klinge Road identified more than 40 underground leaking storage tanks in Rock Creek Park. It does not appear that the National Park Service has done its job in eradicating those leaks. (rocr2769.028)

**Response:** The referenced report refers to underground storage tanks located within a half-mile of Rock Creek Park. There are no leaking underground storage tanks within the boundaries of Rock Creek Park or the Rock Creek and Potomac Parkway. The National Park Service is not responsible for the condition of property outside its boundaries.

## WETLANDS AND FLOODPLAINS

### Issue 1: Trails Constructed in Floodplains Could Have Adverse Impacts

**Representative Comment 1:** The District of Columbia, Department of Health, Bureau of Environmental Quality (BEQ) agrees that trails should be re-routed out of the 100-year floodplain. BEQ suggests that no new trails be constructed within the 100-year floodplain. If trails were constructed within the floodplain, this could be considered a long-term impact, as it would decrease the infiltration area available for stream energy dissipation during a flood event area and potential infiltration/velocity reduction of runoff entering the stream. Also, construction of trails within the floodplain could impact stream meandering. (rocr1736.004)

**Response:** Prior to making any changes to the park's trail system, the National Park Service will prepare a trail plan for Rock Creek Park. The District of Columbia, Department of Health will be consulted during preparation of this plan for input on these concerns.

As a part of preparing the trail plan, the National Park Service will perform a trail study to determine optimal trail alignments that will minimize impacts of trails and avoid conflicts among visitors. The study will outline the standards to be used in trail design and construction and will include maps and costs for trail alternatives. As part of this process, the National Park Service will provide National Environmental Policy Act documentation, which will include opportunities for agency and public review and comment.

### Issue 2: Explain Why Some Features Are Allowed in Floodplains

Page 125 states that "Under NPS floodplain management guidelines, historic structures, picnic facilities, daytime parking facilities, roads, and trails are acceptable within the 100-year floodplain." EPA suggests explaining why these facilities are acceptable within the 100-year floodplain so as to warrant attention/rehabilitation to impacted sites. For instance, it is specifically stated that "Rehabilitation of the Peirce Mill complex would occur within the 100-year floodplain. This historic structure is allowed within the 100-year floodplain under NPS Floodplain Management Guidelines (NPS 1993a)." It is also stated that improving and possibly rerouting of the recreation trails along Rock Creek, portions of which are in the 100-year floodplain, is planned. Trail construction in a floodplain is acceptable under NPS Floodplain Management Guidelines (NPS 1993a)." (rocr2982.006)

**Response:** The text in the final environmental impact statement was changed to explain that trails are acceptable for installation within a floodplain because they would not change its flood-carrying capacity.

Detailed explanations of why historic structures are allowed within the 100-year floodplain in national parks are provided in the recently updated *Director's Order 77-2, Floodplain Management* (2003) and *Procedural Manual #77-2: Floodplain Management* (2002). Both of these are available from the NPS' Internet site. Briefly, moving a historic structure from the site where it was constructed would adversely affect the integrity of the property's location, design, setting, materials, workmanship, feeling, and/or association which together qualify the property for listing in the National Register of Historic Places. Using the Peirce Mill example from the comment,



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there is an integral association of a mill with flowing water. Moving the mill out of the floodplain would sever this association and have a major adverse impact on its integrity.

### DECIDUOUS FORESTS

#### **Issue 1: The BEQ Had Concerns about the Analysis**

All of the comments under this issue are from the District of Columbia, Department of Health Environmental Health Administration, Bureau of Environmental Quality (BEQ) (rocr1736.005)

**Comment 1:** We are particularly concerned with an issue that is not dealt with in the document - routine maintenance of the Park. There are several invasive species of plants and animals that are having a devastating effect upon many areas in and outside of the Park. Because the Park is surrounded by urban areas with impervious surfaces, storm flows have and are causing stream channel instability and a loss of habitat. Both of these issues are operation and maintenance issues. We believe that O&M budgets need to be increased in order to protect and improve the Park ecosystem.

**Response:** Following completion of the general management plan, the natural resources management plan for the park will be updated. This will include updating the plan for the management of invasive species. However, without adequate funding for control, invasive species will continue to be a problem. The National Park Service will continue to work with surrounding communities to improve management of storm water flows.

*Management Policies 2001* states that management actions, including the restoration of extirpated native species, the alteration of natural fire regimes, the control of invasive species, the management of endangered species, and the protection of air and water quality, should be attempted only when the knowledge and tools exist to accomplish clearly articulated goals. Exotic species will not be allowed to displace native species if displacement can be prevented.

**Comment 2:** *Regarding the Alternative A analysis on page 176:*

The amount of trail that is to be reconstructed vs. newly constructed is confusing. In the summary document, under Alts. A, C & D, upgrading of 9.8 miles of trail is mentioned. However, in this text, only around 3 miles of trail is specifically mentioned. Would the other trails not be in forested areas? Where are the impacts from these trails mentioned? Also, how is it a net of 500 ft. of new trail when the following sentence says 3,500 ft. of new trail?

**Response:** A new section, "Summary of Trail Improvements" was added to each of the action alternatives. The analysis under the "Deciduous Forests" impact topic was revised to clarify the lengths and areas of impacts.

The impact analysis only considered the trails within the forest zone that would be relocated because of problems such as steep slopes or severe erosion. Upgrades of trails along park roadways would occur in previously disturbed areas where there would be little need to remove trees or otherwise alter the vegetation or character of the deciduous forest. Similarly, constructing new trails along Piney Branch Parkway and other park roads would have a negligible effect on the park's deciduous forests. Some of the lands on which new trails would be aligned currently are

maintained as grasslands within the road right-of-way, and there would be no effects on deciduous forests in these areas. The wooded areas where new trail construction would occur would be on the forest margins, and careful trail design would avoid most tree removal and other activities that could alter the forest.

**Comment 3:** What type of material would be used on the foot/horse trail? BEQ would recommend that these trails be non-paved. For trails that are to be upgraded or relocated, the BEQ would also recommend that porous asphalt or other alternatives to traditional asphalt pavement be utilized.

**Response:** The National Park Service would welcome recommendations from the BEQ on porous materials that would provide the longevity and durability of asphalt.

**Comment 4:** Does the 4-5 acres refer to the area needed to rehabilitate the 3 miles of trail or other trail located elsewhere? Would monitoring occur to ensure areas become revegetated with native species? There is likely a non-native seed source within the park. BEQ would recommend replanting these areas with native tree species to prevent non-native regeneration and also monitoring of the site to ensure reforestation.

**Response:** The impact evaluation was revised to clarify the acreages that would be revegetated following trail construction. The trail plan that will be prepared before any changes to the trail system are made will include details regarding revegetation procedures and monitoring to ensure success.

**Comment 5:** *Regarding the Alternative A analysis on page 177 concerning effects on the riparian deciduous zone:*

What are the riparian zone dimensions, what would constitute a trail being within a riparian zone and what would be criteria for relocation? Also, how much of the 9.8 miles of trail is found within the riparian zone? Figures should be provided for the riparian trail as they were for the upland trails. BEQ recommends relocation of trails from riparian zones (a 50-foot buffer on each side of stream).

**Response:** Details such as these will be developed in the trail plan. However, it is already recognized that in some areas, it may not be possible to avoid riparian zones without getting into steeply sloping areas with high potential for erosion. The trail plan will identify these areas of concern and develop approaches to protect vegetation and soil resources at each of these sites. The planning process will include consultations with the District of Columbia, Department of Health to ensure their concerns are addressed and to take advantage of the extensive knowledge of their staff. As part of this process, the National Park Service will provide National Environmental Policy Act documentation, which will include opportunities for agency and public review and comment.

## **Issue 2: Provide Maps of Trails That Will Be Realigned**

**Representative Comment 1:** As stated within the Draft GMP/EIS (page 99), Alternative D proposes to improve the protection of the park's natural resources. In particular, poorly designed sections of foot and horse trails would be rerouted and abandoned trail sections would be restored to

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natural conditions. Those sections of the existing recreational trail slated for realignment should be clearly depicted on a map in the Final GMP/EIS to ensure the protection of natural resources. (rocr2982.004)

**Response:** Maps showing proposed changes in the trail system are beyond the scope of a general management plan and have not yet been developed. They will be part of the trail plan that was discussed in the preceding response. The U.S. Environmental Protection Agency and others will have the opportunity to review and comment on the trail plan as part of the National Environmental Policy Act evaluation of alternatives that will be prepared as part of the trail planning process.

### Issue 3: Manage Invasive Species

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

**Representative Comment 2:** There is a continued threat to the wild plants in the Park, as well as invasion by exotic species. A long-range plan to address these concerns would guide budget decisions. (rocr3027.007)

**Representative Comment 3:** The current discussion of invasive species control in the draft General Management Plan/Environmental Impact Statement for Rock Creek Park is vague and inadequate. The current draft GMP/EIS is too summary and greatly underestimates the negative impacts of invasive species on the Park's environment and aesthetic beauty: "The recent inventory of park vegetation also determined that 238 of the plant species were introduced species, not native to the area. Of this number, 42 species have been judged to be invasive exotic species that, unless controlled, are likely to spread and adversely affect native plant populations. Control of these invasive exotic plants is a serious problem in the park."

Specifically, the draft GMP/EIS should more explicitly identify that invasive species have a serious negative affect on native plant populations, tree health, soil stability, and can be a breeding ground for rodents. In addition, the aesthetic beauty of the Park is seriously compromised due to the invasive vines and plants that hamper viewing of native species in the Park.

The final GMP/EIS requires an assessment of those areas of the Park most affected by invasive species. The final GMP/EIS must map and catalog those areas of the Park that are affected by invasive species with an indication of which species are present and the severity of infestation. Attached is a list of invasive species from the Virginia Department of Conservation and Recreation which can be used as a starting point to catalog the invasive species with the most impact on the Park.

The seriousness of this issue requires that the NPS work with other Federal Agencies (e.g., National Invasive Species Council, [www.invasivespecies.gov/](http://www.invasivespecies.gov/)) and local governments (e.g., Arlington County is engaged in a invasive species removal in its parks including the spraying of English Ivy in Lubber Run park) before completion of the final GMP/EIS in order to: (1) better document and assess the dramatic negative impacts to the Park's health and beauty; and (2) identify control

and eradication measures for invasive species. NPS should collect input from these experts and other interested stakeholders and factor their recommendations into the final GMP/EIS. (rocr2900.002)

**Response:** Consistent with *Management Policies 2001*, the National Park Service has policies for managing against invasive plant species. These will be implemented regardless of the management direction included in the general management plan.

The level of detail requested in the last comment is too great for a general management plan. The park's management plan for invasive species will be updated as part of updating the natural resources management plan after the general management plan is finalized. The updated plan will include the types of information outlined in the last comment.

#### **Issue 4: Level of Impacts Is not Correct**

**Representative Comment 1:** Paving 9.5 miles of recreation trails or paving other trails would not be upgrading but instead would be destroying the natural walking and observation experience. Users of the park trails want to get away from pavement. Conversion of about a half acre of forested land to a new paved trail area "as well as disturbance of about 4 to 5 acres of forest for a trail construction zone" would not be minor nor short term effects, but would be major, long term adverse effects on the park. (rocr3026.003)

**Response:** Based on the intensity and duration thresholds presented on pages 175 and 176 of the draft environmental impact statement, the analysis is correct. The suggested changes were not made in the final environmental impact statement.

#### **Issue 5: Address Gypsy Moths and West Nile Virus**

**Representative Comment 1:** We have gypsy moths that have required aerial spraying. The West Nile Virus has also been reported in the area. Both of these present very real threats to the environment that seem to be overlooked. (rocr2769.029)

**Response:** Management of gypsy moths will be included in the update of the park's natural resources management plan, which will be prepared after the general management plan is finalized. West Nile virus appears to be an evolving condition that may not require management actions. This determination will be made when the outline for the natural resource management plan update is developed, based on the best information that is available at that time.

#### **Issue 6: Provide More Information on Forest Ecology and Health**

**Representative Comment 1:** The question now arises, How well are your beeches reproducing? Have the roadways and other openings let in enough light to encourage less shade tolerant trees to come in instead of reproduction by beech trees? This is important to find out if you are going to preserve the timber from injury and spoliation. It appears evident from this Draft Plan as well as from the previous Preliminary Alternative Scenarios that the planning team has an extremely limited knowledge of the significance of the resources and their ecology. (rocr3018.007)

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**Response:** The level of detail requested is too great for a general management plan. Indicators of forest health will be included in the updated natural resources management plan.

### Issue 7: Protect the Park's Natural Features

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

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

## PROTECTED AND RARE SPECIES

### Issue 1: Management of Amphipods

**Representative Comment 1:** Sections are distressingly sparse and uninformative. The document mentions the awareness by NPS that the endangered Hays spring amphipod resides in the park and thus requires special protections, but those protections are not detailed. Also, this amphipod was only recently discovered in Rock Creek Park in 1998. What measures are being taken by NPS to better inventory park wildlife and thus ensure the protection of other, perhaps as yet undiscovered, species within the park? (rocr0332.007)

**Response:** The general management plan includes a commitment to protect and manage this endangered species. However, details on how this commitment and the many other goals and commitments in the plan will be implemented are typically included in the resource management plan. The National Park Service will continue to coordinate closely with the U.S. Fish and Wildlife Service to determine the best ways to protect this endangered species.

The best method to protect other, perhaps as yet undiscovered, species within the park is to protect the unusual or unique habitats that could be supporting special concern species. These habitats, such as the seeps that support the Hays spring amphipod, have been mapped and are actively managed to maintain their unique characteristics. The environmental and siting studies that are conducted prior to constructing or relocating any park facilities include evaluations to ensure that the proposed action would not adversely affect these special habitats.

The park's natural resources management plan includes implementation information on identifying and managing native species, including endangered, other protected, and rare species. This plan will be updated after the general management plan is completed.

**Representative Comment 2:** Protection of the federally endangered Hays spring amphipod warrants attention as well as ensuring that historic resources will not be adversely affected. (Impacts

to these resources were the reason that construction of a paved recreation trail as well as converting the streamside segment of the Blackhorse Trail and construction of a parallel horse trail to replace the Blackhorse Trail were eliminated from further analysis.) Therefore, rerouting of horse trails should be outlined in the Final GMP/EIS to ensure the protection of valued resources. (rocr2982.005)

**Response:** Details, such as the segments of horse trails that would be rerouted, will be developed during the preparation of a trail plan following completion of the environmental impact statement.

The endangered Hays spring amphipod is of special concern to the National Park Service. We constantly are monitoring around this site to ensure its continued protection. Impacts will be evaluated in the environmental impact statement that will be prepared as part of the trail plan process to ensure the protection of this endangered species.

**Representative Comment 3:** Only one federally listed species, the endangered Hays spring amphipod is known to inhabit the park. Ironically, these groundwater amphipods are known to be highly sensitive to environmental pollution, but there is an abundance of these amphipods in the park. This would seem to undercut the argument that water pollution threatens the environment. It looks like Rock Creek Park is alive and well. (rocr2769.030)

**Response:** Comment noted.

## **Issue 2: Add Information on Protected and Rare Species of Birds**

**Comments:** Although they do not make a direct statement, the comments that identified the presence of special concern bird species in the park (rocr3024.001, rocr3025.004, and rocr3106.002) imply that the analysis of protected and rare species is inadequate because it does not consider this group of special concern species.

**Response:** Information on special concern bird species was added to the “Affected Environment” section.

## **OTHER NATIVE WILDLIFE**

### **Issue 1: Impact Intensity from Habitat Loss Was Inaccurate**

**Representative Comment 1:** The establishing legislation for RCP clearly states that timber and animals are to be preserved from injury or spoliation; yet in Table 1, wildlife is not deemed as being critical to the park significance and character. Several statements exist in the GMP that casually say the effects on wildlife are temporary and could be controlled by best management practices. How can effects be short term when a den tree or a nest is destroyed. Yes, animals may move when disturbed, but some may not return when disturbance is over. What effect will displaced animals have on habitats of other animals that are already stressed by the small, island nature of the park habitat. (rocr2981.011)

**Response:** Most of the wildlife species in the park are highly tolerant of human disturbance and are adaptable to a wide range of conditions. These species probably would not be affected by the

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limited area of increased plant diversity that would result along trail construction corridors until the mature forest was restored.

Site-specific surveys for high-value wildlife habitat, including trees with holes used for nests or dens, would be conducted as part of the detailed planning for projects such as trail construction. The preferred approach would be avoidance of any such resources that were discovered. If this was not practical, vegetation removal would be conducted in the winter to avoid harm to young animals. Mitigation measures such as nest boxes or artificial den sites could be installed to replace important wildlife resources.

All proposed construction projects would include preparation of National Environmental Policy Act documentation with opportunities for public review and comment.

The impact analysis was reviewed and, based on these considerations, no changes in the impact intensity were made.

### **Issue 2: Analysis of Effects on Birds Was Inadequate**

**Representative Comment 1:** New construction in this environmentally sensitive area would have a very negative and disruptive effect on the park generally and in particular on the birds of the park, especially those most vulnerable to the destruction of an important feeding and resting area. (rocr0826.001)

**Response:** The analysis of impacts in the final environmental impact statement was expanded to include greater consideration of birds.

### **Issue 3: Loss of Bird Habitat Would Occur in the Maintenance Yard**

**Representative Comment 1:** We're very concerned about the potential for building the new administrative and U.S. Park Police headquarters at the maintenance yard, which as [an earlier speaker] said, is an important habitat for birds. And since field habitat only represents 1.5 percent of the park habitat, I think it would be a good idea to enhance it and not destroy it. (rocr3105.007)

**Representative Comment 2:** I just would end by absolutely recommending the preservation and enhancement of a rough meadow in the maintenance yard as a critical environmental habitat and absolutely do not move forward with the proposed destruction of this habitat as outlined on page 182 of your management plan. (rocr3106.003)

**Representative Comment 3:** Even to consider building a new administration building in the maintenance yard (described in Claudia Wild's 1993 book on bird-finding in Washington) as "the best migrant trap in the city" and the "most important field habitat for migratory birds in DC" shows an amazing lack of awareness of the importance of this part of Rock Creek Park to migrants. While I recognize that this is not a preferred alternative, even to suggest it is frightening for what it reveals about the level of awareness by the individuals who developed the plan. In fact, this type of less-managed (i.e., less mowed and groomed) edge habitat found in the back of the maintenance yard is vital for bird feeding and resting during migration, and every effort should be made to increase this habitat in Rock Creek. There are many areas now regularly mowed which serve no specific recreational use and which could support small areas of native

shrubs and forbs. Other types of wildlife would also benefit from this management practice. (rocr0644.005)

**Representative Comment 4:** While the rough meadow area of the Maintenance Yard appears untidy and superficially may appear to be of very low habitat value, the opposite is actually the case. Most neotropical migrants fly during the night and at dawn are searching for suitable habitat to feed and rest during the daytime. Rock Creek Park's forest and adjacent vegetation provides vital fruit, seeds and insects for migrants. Particularly attractive to many species are the bushes, vines and grasses found in meadow and forest edge environments, which are increasingly rare in Washington's urban setting. The Maintenance Yard, cited in Claudia Wild's book [*Finding Birds in the National Capital Area*] as the "best field habitat in the Park," is a prime example of this type of environment. This is based not only on over ten years of detailed survey work but on the observations of many other individuals. It is perhaps not unexpected that some of the most unusual migrants ever recorded in Rock Creek have appeared (and stayed, sometimes for many days) in this rich feeding area. These include clay-colored sparrow, lark sparrow, sedge wren and mountain bluebird. Rather than destroying this unique area, it is recommended the National Park Service take steps to preserve and enhance this habitat. (rocr3024.002)

**Response:** The final environmental impact statement was revised to clarify that the park maintenance yard and H-3 area were just candidate sites. It also made clear that new in-park facilities would be constructed only if suitable commercial space could not be found outside the park and after a siting study that emphasized environmental concerns that determined the best in-park locations for the facilities.

If construction in the maintenance area was necessary, it would be restricted to the footprint of the existing impervious surfaces in the developed area on the west side of the maintenance area. This could involve, for example, replacing the existing structure with a multi-story building.

The final environmental impact statement also was revised to include a commitment to improve management of the park, specifically including the maintenance yard, for birds. Implementation details will be included in the updated natural resources management plan, which will be prepared after the general management plan is approved.

#### **Issue 4: Planning for Wildlife Management Was Inadequate**

**Representative Comment 1:** The Draft General Management Plan should describe the deer population and develop reasonable carrying capacity estimates for deer relative to other important components of the ecosystem. I realize that all of the deer's natural predators are gone and that hunting in National Parks is against the law. Nevertheless, under the circumstances of this highly-urbanized park, the Park Service should consider population control measures for deer in the Park. If you don't implement such a program, at some point many deer will die of disease, starvation, and/or as roadkills. (rocr2901.008)

**Representative Comment 2:** Most birdwatchers would appreciate better attention to management of vegetation, protection of important migrant bird concentration areas (such as the Maintenance Yard) and other actions to improve habitat. They would also appreciate some common sense/courtesy — such as not mowing the major areas where birders congregate until after the peak observation times (that is, mid to late morning) during migration season. Control of off-lead



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dogs (which doesn't happen) and removal of free-ranging cats from the stable area would also enhance well-being of native wildlife, including birds. (rocr3025.010)

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

**Response:** The park's natural resources management will be updated following the completion of the general management plan. This document will include the types of details requested in these comments.

### **Issue 5: Analysis of Roadway Impacts on Wildlife Was Inadequate**

**Representative Comment 1:** All statements declaring that road kill is not believed to be adversely affecting the populations of any species that resides in the park and parkway vicinity are merely speculative. Animal species may be abundant region wide but within the park boundaries may be rare. Road kill records kept by the park's resource management staff show trends that would indicate that several species are declining park wide. For instance, eastern box turtle, opossum, and gray fox are all becoming exceedingly less common. Observation records of these animals are also showing the same trend. It may be true that other factors may be at work against these animals, but certainly road kills is more significant than stated in the GMP. (rocr2981.011)

**Representative Comment 2:** The adverse effects of roads and trails on wildlife populations have been documented in several studies. Aside from the obvious problem of automobile collisions, roads (and even foot trails) can disrupt migration and movement of many animals, especially amphibians and reptiles, but also including many mammals. The current motorized traffic has probably contributed to the extirpation of the striped skunk and the reduction in the populations of the eastern box turtle, large snakes, opossums, and chipmunks. Natural parks embedded within an urban landscape often act as island refuges for wildlife species. Bisecting the park with a heavily traveled road will concentrate animals into smaller areas, promoting over-population and the environmental degradation related to that. (I will provide citations supporting these statements.) (rocr2980.004)

**Response:** The impact analysis was reviewed based on these types of comments and was determined to be adequate. No changes were made in the final environmental impact statement.

### **Issue 6: Attention to Effects of Invasive Species and Their Management Was Inadequate**

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

**Representative Comment 2:** The urban pollution and runoff problems affect the fish populations, but so do free-roaming domestic cats, which prey on local populations of songbirds, squirrel and small mammals. Are we planning to do away with the domestic cats? (rocr2769.031)

**Representative Comment 3:** We support continued measures to contain the threat of invasive species, although we would prefer that it be formulated under the principles of integrated pest management. That would place the selective application of herbicides in limited portions of the park as a last resort after less toxic alternatives have been evaluated. (rocr0829.001)

**Response:** Parks are required to prepare integrated pest management plans, which include the control of invasive species and feral animals. This will be included in the next update of the park's natural resources management plan. Herbicide and pesticide use already is strictly limited and these chemicals are used only when other methods prove ineffective.

## ARCHEOLOGICAL RESOURCES

### Issue 1: Improve Management of Lesser-Known Sites

**Representative Comment 1:** [The National Park Service should provide] more far-reaching preservation and restoration of the park's less known cultural sites, such as the Miller Cabin, Soapstone Quarry, other mill locations, spring houses and similar outbuildings, and other archeological sites. (rocr0315.004)

**Response:** The National Park Service currently is in the second year of a four-year archeological identification and evaluation study of the park. Measures for improved management will be developed after this inventory provides a complete picture of the park's archeological resources. Consistent with its mandate, the National Park Service will continue to preserve and protect the park's archeological resources, historic structures, and cultural landscapes for future use and interpretation.

## HISTORIC RESOURCES AND CULTURAL LANDSCAPES

### Issue 1: Clarify Management of Peirce Mill

**Representative Comment 1:** The various alternative plans presented in the GMP are virtually identical in their references to Peirce Mill. However, the report fails to mention that the objective of the project is to restore the mill to operation. (rocr1581.001)

**Response:** Peirce Mill management is not a component of the general management plan. The approach for managing this facility has already been determined and would not change regardless of the alternative selected in the general management plan.

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

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The recommendation from the report, which will be implemented by the National Park Service, is to rehabilitate Peirce Mill to provide a historically accurate representation of a typical mill complex in the region. This will include restoring the milling machinery to a fully operable condition. However, because the mill race was relocated away from the site many years ago, it will not be possible to restore operation of the mill using water power. The landscape of the complex will be rehabilitated to retain the historic character while allowing continued use. The final general management plan was revised to better clarify the upcoming action for Peirce Mill.

### **Issue 2: Provide More Information on Treatment and Reuse of Historic Structures**

**Representative Comment 1:** The Plan does not provide adequate guidance on how Peirce Mill, 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.
- 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. (rocr3030.011)

**Response:** As described under Issue 1, Peirce Mill, including its milling machinery, will be restored to a fully operable condition. However, because the mill race was relocated away from the site many years ago, it will not be possible to restore operation of the mill using water power.

The Peirce-Klinge Mansion and Lodge House will undergo cultural resource studies to determine their condition and to what level they should be preserved. This standard practice for historic structures involves a detailed investigation that is beyond the scope of a general management plan. No changes at these sites would occur until these studies were completed.

The cultural resource management requirements described on pages 23 and 24 of the draft general management plan clearly state that any changes proposed to cultural resources will comply with the National Historic Preservation Act, including Section 106. As a broad management document, the general management plan and environmental impact statement can provide only partial completion of the Section 106 requirements for the cultural resources in the park. Additional Section 106 compliance will be done at a later date in association with implementing individual projects. This will include submitting preliminary plans and drawings for the adaptive use of the structures to the state historic preservation officer for review and comment.

### **Issue 3: Traffic Management Could Affect Use and Appreciation of Historic Resources**

**Representative Comment 1:** The draft appendix Table F1 is a list of resources that contribute to the significance of the Rock Creek Historic District. Included on the list is the Sixteenth Street Bridge and the circulation network of historic roads and trails. Alternative D would place more of a volume of traffic on 16th Street and Blagden Avenue. (rocr2769.032)

**Representative Comment 2:** All of our parkways in Rock Creek Park are fundamental components of the Park's original design by Frederick Law Olmsted, Jr. and intended for motor vehicle use specially in order to provide broad-based access to the Park for ALL citizens. By closing Beach Drive you take away our parkway and their use which are important parts of the historic heritage and cultural landscape of our city. (rocr0750.002)

**Representative Comment 3:** Further restricting Beach Drive is another step toward completely eliminating the traditional and historic experience of touring Rock Creek Park, and also would rob the public of cultural resources that so many DC residents and visitors have enjoyed and cherished for nearly 100 years. (rocr0452.005)

**Response:** Comments were noted.

### **Issue 4: Management of Cultural Landscapes Would Affect Natural Resources**

**Representative Comment 1:** Current cultural and otherwise pressures to cut down trees to open up vistas on long past eras or activities such as the rock-mounted preacher are detrimental to present and future existence of the natural and environmental elements of the park and to the natural types of recreation. (rocr3026.001)

**Response:** Goals of the park's natural and cultural resource management plans include balancing these types of resources in a way that does not adversely affect either.

## **TRADITIONAL PARK CHARACTER AND VISITOR EXPERIENCE**

### **Issue 1: Management Would Change the Park Character and Visitor Experience**

**Representative Comments:** Most of the comments on traditional park character and visitor experience were general statements regarding the writer's perceived effects of the alternatives. For example, commenters commonly said that one or more of the alternatives would:

- Serve (or exclude) one population or another. (rocr0309.003)
- Attract (or deter) visits by specified groups of people. (rocr0551.004)
- Be a benefit (or detriment) to specified groups of people. (rocr0523.003)
- Enhance (or decrease) the quality of life for people in the Washington metropolitan area. (rocr0331.002)

## ENVIRONMENTAL CONSEQUENCES

- Provide (or eliminate) recreational, relaxation, and/or decompression values to visitors who travel along Beach Drive through the park. (rocr0366.001)
- Give (or deprive) visitors of a quiet place where they could escape all the noise and stress. (rocr0623.002)
- Provide (or deny) access to the creek and gorge, the availability of which are among the main pleasures of the park. (rocr1533.003)
- Increase (or decrease) their personal convenience in using the park. (rocr1718.003)

**Response:** As demonstrated by these comments, effects of management actions on traditional park character and visitor experience vary widely based on the perceptions of individuals. All of these comments were noted.

### **Issue 2: Analysis of Effects Was Inadequate**

**Representative Comment 1:** The Draft GMP/EIS fails to provide adequate analysis of potential recreational benefits of proposed closure. (U.S. Representative Chris Van Hollen, rocr2994.010).

**Response:** The text of the final environmental impact statement was changed to better explain the recreational benefits of Beach Drive closures and identify the intensity of this impact.

**Representative Comment 2:** The National Park Service also claims that its proposed road closure would enhance educational outreach programs. This argument is fallacious. Beach Drive is needed in order to get those groups to the various picnic areas and parking lots from which they can then take trails into the woods. (rocr0764.008)

**Response:** All park facilities, including picnic areas and parking lots, would continue to be accessible by automobile under any of the alternatives.

### **Issue 3: The Impact Determinations Are Unsupported**

**Representative Comment 1:** The RCP Superintendent is arguing that there is a potential adverse environmental impact warranting a partial closure of Beach Drive. The Superintendent's claims are opposite those of other environmental authorities. The NPS should respond to environmental threats to the Nation's parks, but should not manufacture information when the threats to public safety and public access are as high as they are in this case. (rocr1709.004)

**Response:** Concerns about existing conditions and the development of the alternatives in the general management plan to manage traffic were based on public scoping and the analysis of data by many professionals within and outside the National Park Service. The environmental effects disclosed in the environmental impact statement were identified and supported by subject matter experts, not the park superintendent.

**Issue 4: Findings of Impact Intensities Are Incorrect**

**Representative Comment 1:** Paving 9.5 miles of recreation trails or paving other trails would not be upgrading but instead would be destroying the natural walking and observation experience. Users of the park trails want to get away from pavement. Conversion of about a half acre of forested land to a new paved trail area "as well as disturbance of about 4 to 5 acres of forest for a trail construction zone" would not be minor nor short term effects, but would be major, long term adverse effects on the park. (rocr3026.003)

**Response:** The impact intensities described in the environmental impact statement are consistent with the intensity thresholds provided under the "Methodology" heading in this section. A more detailed analysis of impacts will be conducted in a project-specific National Environmental Policy Act compliance document prepared as part of the trail plan.

**Representative Comment 2:** In its discussion of the impacts of Plan C on traditional park character and visitor experience, the Park Service states that "Permanent closure of sections of Beach Drive would eliminate the traditional visitor experience of automobile touring along the length of the park" (page 232). "This would be a major adverse impact on the traditional visitor experience," says the Park Service. However, automobile touring was not specified as a use for the park in its establishing legislation of 1890 (before automobiles were available). There is no mandate that automobile touring be provided for in Rock Creek Park, and in fact such access could be replaced by a well-run system of public transit, pedestrian and bicycle access. (rocr0332.005)

On page 142 of the draft document, it is stated that between 1991 and 1997, out of a total of 14,464,000 annual visitors to the park, 12,389,000 were "Nonrecreational (commuters)" and only 2,075,000 were "Recreational." I assume that most people would consider automobile touring to be a recreational rather than commuter activity. If that is the case, then how can closing Beach Drive and eliminating automobile touring be considered a "major impact on the traditional visitor experience" if 84% of visitors are in fact nonrecreational commuters? According to the Park Service's numbers, the current traditional visitor experience appears to be commuting through the park to get to work, not automobile touring in order to enjoy the scenery. (rocr0332.006)

**Response:** An activity does not have to be identified in a park's establishing legislation or occur over a long time to be part of the traditional visitor experience. For example, in-line skating was not included in the Rock Creek Park establishing legislation and has been popularized only since 1986 ([www.rollerskatingmuseum.com](http://www.rollerskatingmuseum.com)). However, in less than 2 decades, this activity has become part of the park's traditional visitor experience. In contrast, automobile touring on Beach Drive has been photographically documented for approximately 100 years and currently represents an estimated 80 percent of park use. Based on the impact threshold criteria defined in the "Methodology" section, the finding of a major adverse impact from eliminating automobile touring along the length of the park on the traditional visitor experience was appropriate.

The June 2004 traffic study conducted by the National Park Service demonstrated that some of the automobile travel through the park on Beach Drive on weekdays, including during both rush hours, is not time effective. In these cases, the driver could have selected another route, most of which were outside the park, that would have reduced the trip duration. This suggests that some of the drivers who use Beach Drive do so for its recreational and aesthetic qualities rather than for its efficiency as a commuter route.

## ENVIRONMENTAL CONSEQUENCES

Current traffic monitoring methods cannot differentiate people who are driving through the park to get from one place to another from those who choose to drive through the park for the quality of the experience, even if they do not stop or get out of their cars. Permanent closures of Beach Drive would cause a major impact on the visitor experience of the latter group.

### **Issue 5: Analysis Should Consider the Park Purpose and NPS Mandate**

**Representative Comment 1:** Balance of factors. The draft GMP seems to pay a lot of attention to effects of traffic on roads outside the Park. While these effects are not irrelevant to the decision, ultimately a decision involving trade-offs must assign different weights to different factors. The Park Service should assign great weight to the recreational use of the Park, and minimal weight to traffic flows outside the Park. In part, this arises from the fact that the purpose of a National Park is to serve as a park, not as a commuter highway.

**Response:** In selecting the preferred alternative for the final environmental impact statement, the National Park Service used a standard procedure, called “Choosing by Advantages,” to evaluate the benefits of the various components of the alternatives. Protection of the park’s and parkway’s cultural and natural resources would be managed much the same under all of the action alternatives. Therefore, providing for public use and enjoyment of park resources was identified as the most important factor in identifying advantages among the alternatives.

The “Methodology” section at the beginning of the analysis of impacts on traditional park character and visitor experience in Alternative A was modified to describe the evaluation process and the impact thresholds. Results based on “Choosing by Advantages” were added to the impact analysis of each of the alternatives in the final environmental impact statement.

### **Issue 6: Alternative D is Contrary to the Park’s Purpose**

**Representative Comment 1:** Another key point is the fact that Beach Drive was not designed for moving traffic through the park but instead to give people access to the park. The National Park Service itself recognizes that Non-Recreational use of park (i.e., commuters in motor vehicles) is a “secondary purpose” permitted only if it does not pose an undue threat to visitor safety, harm the park’s resources or create excessive congestion. (id. at p. 55). This conclusion seems to be at odds with the National Park Service’s choice of Alternative D, which essentially grants commuters a special use permit to be the sole users of Beach Drive during the morning and evening rush hours. (rocr2754.005)

**Response:** In the park’s 1890 establishing legislation, Congress instructed park managers “to lay out and prepare roadways and bridle paths, to be used for driving and for horseback riding.” At that time, the automobile was in its infancy (the first practical model was built in Germany 1889 based on German patents filed in 1886) and the phrase “for driving” referred to a horse and carriage. However, there was no stipulation that the roads in the park were to be available exclusively for horse-drawn vehicles or for recreational purposes.

Subsequently, Congress authorized construction of the Rock Creek and Potomac Parkway (1913) to connect Rock Creek Park and the National Zoo with Potomac Park, and installation of the zoo tunnel (1966) to relieve traffic congestion around the zoo. Together, these actions by Congress

provided an automobile route through the park from the Maryland state line to the monumental core of the city. These past decisions by Congress resulted in the current use of park roads for nonrecreational purposes as well as providing visitors with access to the park.

While it is true that Beach Drive is a park road, over the years it has been carrying city traffic. Alternative D was developed as a way of balancing city concerns with the park's establishing legislation and NPS' mandates. It does not grant any kind of special use permit to anyone. It also does not accommodate commuter traffic to an extent any greater than Alternative A or B.

**Representative Comment 2:** [Alternative D] also directly and seriously undercuts the legislated purpose of connecting the north and south parts of the Park with the Zoo. (U.S. Representative Chris Van Hollen, rocr2994.006)

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

- The 1890 act does not mention the zoo (which did not exist at that time). With regard to transportation, park managers were instructed to “lay out and prepare roadways and bridle paths . . . and footways” without specifying what they were supposed to connect.
- The 1913 act authorized the United States to acquire the lands to be used for the Rock Creek and Potomac Parkway “for the purpose of . . . connecting Potomac Park with the Zoological Park and Rock Creek Park.”

The connection between the north and south parts of the park via automobile would be maintained under any of the management alternatives in the draft general management plan.

## **Issue 7: Analysis Should Consider Changing Demographics**

**Representative Comment 1:** The interpretation recommendations in the guide are very lacking. There is no analysis to back them up. I see 5 pages of information that describes the population surrounding the park. I don't see a serious analysis of the demographic transfer from today to 2020, nor we look at what the varied populations around the park will want and need in the future. We really would like to see the education and interpretation programs address that. (rocr3093.002)

**Response:** The National Park Service used information provided by other government agencies that specialize in demographic analyses and forecasting to characterize current and future populations that will be served by the park.

The general management plan identifies goals to protect park resources and ensure visitor enjoyment. It also outlines approaches that can be used to achieve the stated goals. The effectiveness of the approaches in meeting the park's goals is monitored through periodic visitor use surveys. Based on the results, approaches are adjusted as needed in a process called adaptive management. Through surveys and adaptive management, the National Park Service adjusts programs to meet needs more frequently than the 15-year timeframe suggested here.



## ENVIRONMENTAL CONSEQUENCES

Education and interpretation is not a general management plan issue. Interpretive planning is provided by the NPS resource center at Harper's Ferry based on regular assessments of park needs. An interpretive plan for Rock Creek Park will be prepared after the general management plan is approved.

### **Issue 8: Analysis Should Include the Maryland Part of the Park**

**Representative Comment 1:** In the Montgomery County portion of the Park the bike and walking trails are used very little during the hours of 9:30-3:30 on weekdays the proposed times for closure. (rocr2999.007)

**Response:** As shown on the Region map at the beginning of the final general management plan, the national park's northern boundary is at the border of Washington, D.C. and the state of Maryland. Rock Creek Park does not extend into Montgomery County. The park area in Maryland is the similarly named Rock Creek Regional Park, which is administered by the Maryland-National Capital Park and Planning Commission. The National Park Service does not have any jurisdiction over this Montgomery County park and the general management plan would not apply to any lands in Maryland.

### **Issue 9: A Study Is Needed to Estimate Future Use**

**Representative Comment 1:** Has the National Park Service conducted any independent "market studies" to determine just how many people are waiting to use the newly closed road from 9:30 ant - 3:30 pm weekdays? (rocr2807.003)

**Representative Comment 2:** The Park Service has not indicated to the public, nor has it demonstrated that a study has been conducted to quantify, how many people would use this closed portion of Beach Drive. The Park Service has not indicated how many people would use this closed roadway in the various weather conditions presented throughout the year. (rocr2885.010)

**Representative Comment 3:** Is there a significant change in the level of recreational use that would result during the periods that the sections of Beach Drive would be closed? (rocr0824.001)

**Representative Comment 4:** In contrast with the frequent assertions attributed to the Rock Creek Park Superintendent, there is no study (independent or otherwise) illustrating either a demand or adverse environmental impact on Rock Creek Park if Beach Drive remains open as it is today. During public comments, the RCP Superintendent has pledged to study the "increased use" of the Park by hikers, bikers and rollerbladers, after she closes Beach Drive. In a similarly disingenuous fashion, the Superintendent has also claimed a demand by the District of Columbia Public School System, but that demand cannot be documented. (rocr1709.004)

**Representative Comment 5:** I write to express my concern about Alternative D in the absence of information that significant numbers of residents would benefit. The Park Service has conducted no survey or offered any information regarding how many people might use the park during the proposed closure, and who they might be. (U.S. Representative Eleanor Holmes Norton, rocr2971.000)

**Response:** The National Park Service has not conducted studies to estimate nonmotorized recreation use that would result from closing Beach Drive to motorized vehicles. However, it is expected to be substantial, based on the large pool of potential weekday users (such as individuals who do not work a traditional Monday through Friday workday schedule, caregivers with small children, retired people, out-of-town visitors, and school groups), the more than 2,000 comments of support that the National Park Service received for Alternative D, and the many comments from people stating that they would use the park on weekdays for nonmotorized recreation if Beach Drive were closed to motorized vehicles.

The National Park Service was charged by Congress to not only provide visitation, but also to provide a high-quality experience. The final environmental impact statement was revised to include the results of an evaluation of the alternatives based on the quality, quantity, and spectrum of recreational opportunities.

With regard to whether significant numbers of residents would benefit, residents of Washington, D.C. would experience the same benefits that would be realized by all park uses.

#### **Issue 10: Current Park Use Does Not Justify Beach Drive Closure**

**Representative Comment 1:** On page 34 of the draft plan, it's stated that given relatively low use patterns (20-35 users per hour), construction of a paved recreation trail wouldn't be justified. How then do you justify closure of an entire road? (rocr2945.003)

**Response:** Current weekday counts of people using recreating along Beach Drive would not be a good indication of park use if Beach Drive closures were implemented, just as the current heavy weekend use of Beach Drive for nonmotorized recreation would not continue if weekend management of Beach Drive was changed to allow traffic.

#### **Issue 11: Accommodate Bikers with a Bike Path**

**Representative Comment 1:** By closing Beach Drive between 9:30 a.m. and 3:30 on weekdays the National Park Service appears willing to sacrifice neighborhood residents and divert at least 250 cars per hour so that a few bicyclists may use the upper part of Beach Drive. The National Park Service lists on page 35 of the draft plan several bike paths that exist above Broad Branch Road, including the Oregon Avenue, Bingham Road, Military Road and Glover-Ross Road trails. If the purpose of the closure of Beach Drive is to make the Park accessible to bikers, these alternative trails already provide that access. If the National Park Service does not wish to encourage bikers to use these trails, then the National Park Service should utilize the engineering expertise available today to construct a bike path that connects its existing bike paths with the path that Montgomery County has constructed to the D.C. line along Beach Drive. National Park Service studies in 1980 and 1990 each recommended the completion of such a bike path along Beach Drive. (page 34) The National Park Service's analysis in its draft plan, however, dismisses this proposal as being unjustifiable given the user numbers and patterns. If the user numbers and patterns do not support the completion of a bike path, they certainly do not support the closure of Beach Drive and conversion of that road into a bike path two-road lanes wide.

## ENVIRONMENTAL CONSEQUENCES

The National Park Service also claims that the construction of a bike path would be expensive. I note, however, that the capital costs of the other improvements that the National Park Service recommends in the draft plan would cost more than \$11 million, but the estimated cost of constructing the bike path would be approximately \$1 million. (rocr0764.004 and .005)

**Response:** A review of the goals that are listed in the description of each alternative shows that none of them identifies bicycle use. Instead, the focus is on recreation opportunities. The NPS' objective is to make the area attractive and safe for a wide range of nonmotorized recreation uses, including recreational bicycling. In two of the alternatives, this would be achieved through closures of Beach Drive to motorized vehicles. The trail plan that will tier from this general management plan will evaluate planning and design of all trails in the park.

### **Issue 12: Determine Effects by Comparing with Similar Experiences Elsewhere**

**Representative Comment 1:** In my day job I study city parks around the country and I pay particular attention to what goes on with cars in parks. And I think I can say that without exception every single car park that has eliminated portions or entirely eliminated cars from the park has been significantly improved by doing that.

Central Park in New York. Total turnaround in that park from being dangerous, shunned to being a fabulous place that's used by millions of people. Prospect Park, Piedmont Park in Atlanta, many other locations. (rocr3119.003)

**Representative Comment 2:** It's a natural tendency for people to oppose change. You see it all the time. When we began lobbying for the Capital Crescent Trail in 1986 the neighborhood along its route and almost every bureaucrat or politician in a decision making position opposed it. Once the trail was completed, every neighborhood loved us and thanked us and every politician wanted to take credit for it. I think this will be your experience if you do choose alternative D. (rocr3130.002)

**Response:** Comments were noted.

### **Issue 13: Horseback Riding in the Park Should Be Eliminated**

**Representative Comment 1:** I feel that horseback riding on trails in the Park should be stopped. I have been a regular weekly visitor to Rock Creek Park for about 15 years. Over this period I have observed that horses cause significant erosion and pollution in the Park. The muddy and excrement and urine polluted horse trails are a disgrace to the physical and aesthetic character of the Park. The amount of horse trail area far exceeds that of foot trails. It is nearly impossible to walk on the horse trails throughout most of the year. They are a mire of mud, poop, and piss. The negative environmental impact of a relatively few horseback riders on the park far exceeds the recreational value of their horses.

Why does the Park allow a few people to degrade the Park experience for the majority, and cause excessive environmental impact on Park resources? I am sure that maintaining the horse trails to mitigate erosion is very expensive (which has only a short term beneficial effect). This is a significant subsidy for the equestrian elite who use the horse trails in the Park.

While therapeutic riding for handicap people is one benefit of horses that I can accept, I rarely if ever actually see such people riding horses. Most of the people I see riding are white and middle class with no apparent physical handicap. Presumably they could afford to ride elsewhere.

I regularly see hoof prints and piles of horse dung on foot trails where horses are not permitted. I have observed horses running on several occasions in the Park. Once a horse was running without a rider. This is dangerous to other people recreating in the Park. To sum, the environmental impact of equestrian recreation in Rock Creek Park far exceeds its recreational value. (rocr0598.001)

**Response:** The legislation that established Rock Creek Park charged park managers “to lay out and prepare roadways and bridle paths, to be used for driving and for horseback riding, respectively.” Therefore, unless the National Park Service is directed otherwise by Congress, bridle paths will continue to be maintained for horseback riding.

The trail plan that will tier from this general management plan will evaluate planning and design of all trails in the park. This will include appropriate maintenance techniques and schedules based on use, including the use of the bridle paths by horses.

#### **Issue 14: Interpretation Should Be Considered as Part of the Visitor Experience**

**Representative Comment 1:** For more than 100 years, Washingtonians of all social strata have experienced the beauty of Rock Creek Park, but the draft general management plan reveals that there is no interpretive plan to guide interpretive programming in Rock Creek Park and that many opportunities for reaching the public in the park are unrealized. The Park has many lessons to teach--and the public, many to learn. Now is the time for the Service to make a commitment to completing an interpretive plan. (rocr0829.011)

**Representative Comment 2:** It is a waste of money to expand the Nature Center and Planetarium unless there is going to be an increased number of trained naturalist staff. At present the Center is closed most week days. The number of nature walks for the public has fallen drastically. The exhibits, while interesting, are the same as they were ten years ago. Without more operating budget, capital expansion is uncalled for. (rocr3027.005)

**Response:** The National Park Service will prepare an interpretive plan following completion of the general management plan. The final general management plan was modified to clarify that the action alternatives would include six new full-time staff positions for interpretation, education, and visitor contact. The action alternatives also could include upgrading the exhibits in the Rock Creek Nature Center and Planetarium.

#### **Issue 15: Other Experiences Should Have Been Considered**

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

## ENVIRONMENTAL CONSEQUENCES

**Response:** The intent to allow canoeing and kayaking to continue as a traditional visitor activity was included in the section “Alternatives or Actions Eliminated from Further Study” in the final general management plan.

**Representative Comment 2:** The draft plan barely mentions birdwatchers as a user group, and thus contains no suggestions to enhance the park experience for them. The park also is missing a unique opportunity to educate park visitors about the phenomenon of bird migration, which is taking place around them every year.

While this might not be as basic an issue as the first two, some rather low-cost actions could greatly enhance the park experience for birdwatchers and other nature lovers. Since birds are one of RCP’s most unique natural resources, birds should form a more important focus of park activities and public outreach. (rocr3025.007)

**Response:** The final general management plan and environmental impact statement was modified to include information on birding.

**Representative Comment 3:** Restricting through traffic will in fact connect upper Rock Creek Park and beyond all the way down to the National Mall enabling tourists on bicycles to enjoy Washington’s well known monuments as well as this natural area. (rocr3063.002)

**Response:** This effect was noted as a cumulative impact in the evaluation of effects for Alternative C and Alternative D.

### **Issue 14: Effects on Access for Individuals with Impaired Mobility**

This was not an impact topic in the draft general management plan and environmental impact statement. However, as discussed previously under “Planning Direction or Guidance, Issue 8: Americans with Disabilities Act Compliance,” more than 170 comments were received, expressing opinions that the various alternatives would either facilitate or impede access by the elderly, people with impaired mobility, families with small children, and others. Representative comments indicating a perceived adverse or beneficial effect were included in that section of this report.

Because of the large number of comments regarding access for individuals with impaired mobility, it was added to the final general management plan and environmental impact statement. Organizationally, it was placed within the Traditional Park Character and Visitor Experience impact topic in both the “Affected Environment” and “Environmental Consequences” sections.

**Representative Comment 1:** Further restricting the permissible uses of Beach Drive during the week strikes me as unfair to those citizens wishing to enjoy the park whose mobility requires a car. The new proposal would eliminate use of Beach Drive during the one segment of time when individuals with disabilities, and others who require a car for mobility, can enjoy the park without having to compete with rush-hour traffic. (U.S. Representative Chris Van Hollen, rocr2994.002)

**Response:** Even with closure of Beach Drive segments, all park facilities, such as picnic areas, parking lots, historical features, and trails, would continue to be available to visitors traveling by automobile. The only limitation would be on driving the length of Beach Drive between these facilities.

Many of the comments on the general management plan expressed support for road closures because closures would facilitate use of park facilities by visitors with impaired mobility. Specifically, people pointed out that seniors, visitors in wheelchairs, and parents with small children currently feel unsafe in the park on weekdays because of vehicle speed, vehicle numbers, and general congestion. Closure of segments of Beach Drive during the mid-day would enable these groups to get recreate safely on the broad, smooth, relatively level roadway.

**Representative Comment 2 :** We do not believe that alternative D which permits vehicular traffic during rush hour, but closes Beach Drive from 9:30 a.m. to 3:30 p.m. will serve the commuting and recreational needs of our residents. A large percentage of the Sheppard Park citizenry are senior citizens and families with young children, many of whom use the park for recreational purposes not only on weekends, but also during the week. Alternative D would deny the use of the portion of Beach Drive which leads to the picnic areas in the park for those citizens who cannot get there but by their own car. (rocr3085.004)

**Response:** Access to all of these areas would continue to be available via motorized vehicles under any of the alternatives.

## REGIONAL AND LOCAL TRANSPORTATION

### Issue 1: Alternatives Would Change Regional and Local Transportation

**Representative Comments:** Most of the comments on regional and local transportation were general statements regarding the effects of the alternatives. For example, commenters commonly said that one or more of the alternatives would:

- Change (or have little effect on) traffic outside of the park during the proposed closure times. (rocr0540.002)
- Facilitate (or impede) commuting by automobile. (rocr0597.002)
- Facilitate (or impede) commuting by bicycle. (rocr0309.005)
- Facilitate (or impede) non-commuting trips by automobile where the destination was not within the park. (rocr0910.002)
- Meet (or not meet) the needs of user groups because the proposed closure periods are convenient or inconvenient. (rocr0309.005)
- Increase (or decrease) travel times to destinations outside of the park. (rocr1451.001)
- Increase (or decrease) the convenience of travel to destinations outside of the park. (rocr0503.001)

Other common, non-specific assertions included the following.

- Automobile traffic in the park during the mid-day period is so light that other uses of the park are not adversely affected. (rocr0361.003)

## ENVIRONMENTAL CONSEQUENCES

- Commuter traffic is an inappropriate use for a national park road. (rocr0506.001)
- Particularly during the rush hours, cyclists impede traffic and are a hazard. (rocr0625.005)

**Response:** All of these comments were noted.

### Issue 2: Traffic Data Are Out of Date

**Representative Comment 1:** The Park Service appears not to have updated its traffic survey for 13 years, since 1990. Given the significance of the potential impacts on motorized park users of some alternatives, it seems highly inadequate to base a management plan on such outdated information. (rocr2850.005)

**Response:** The impact analysis in the final environmental impact statement was based on the most recent data currently available. These include:

- *2001 Traffic Volumes Map*. District of Columbia, Department of Transportation.
- Unpublished traffic counts provided by Richard Hawthorne, Chief of Transportation Planning, Maryland-National Capital Park and Planning Commission.
- *June 2004 Traffic Study for Rock Creek Park, Washington, D.C.*, prepared for National Park Service, Denver Service Center.

**Representative Comment 2:** While you failed to study the impact of cut-through traffic, we are grateful that the Maryland National Capital Parks and Planning Commission did conduct a limited traffic count which demonstrates that cut-through traffic in the Rollingwood Section of Chevy Chase surges by 45% on weekends between 9 a.m. to 3 p.m. This is not neighborhood traffic conducting weekend errands as some have suggested. It is clear to those of us who observe cars speeding through the neighborhood that most of this traffic is external to our community. The MNCPPC count also demonstrates that approximately 1,500 automobiles enter the park from the Beach Drive between 9 and 3. (rocr0822.002)

**Response:** The referenced data were obtained from the Maryland-National Capital Park and Planning Commission and were used in the updated analysis of impacts in the final environmental impact statement.

### Issue 3: Impacts on Neighborhood Roads Were Inadequately Addressed

**Representative Comment 1:** I also am concerned about the absence of information concerning the effect of rerouting automobile traffic from Beach Drive onto surrounding residential streets from 9:30 am-3:30 pm. The NPS conducted a four day weekday study of traffic patterns on Beach Drive from 9:00 am-4:00 pm. The Park Service may regard the number of vehicles-one to three cars per minute- as an insufficient traffic burden on residential streets when the neighborhood is viewed as a unit. What is not known is whether some streets might get the brunt of this traffic. It seems likely that drivers would discover the routes most convenient to themselves and if so, that certain residential streets might receive disproportionate concentrations of automobile traffic. More information would be needed regarding the impact that closing Beach Drive would have on the neighborhood streets that border the park, which routes cars would likely take, and

other effects on the city's major arteries (Connecticut Avenue, 16th Street) in order to ensure that side streets do not become proxies for Beach Drive. (Representative Eleanor Holmes Norton, rocr2971.003)

**Representative Comment 2:** Without a systematic assessment of the impact of diverting traffic from Beach Drive onto residential streets, it is inconceivable that the NPS would consider this alternative. (rocr0701.002)

**Representative Comment 3:** Traffic cutting through Forest Hills is not an imaginary issue. Those of us who have lived in Forest Hills within one block of Rock Creek Park for 25 years can speak from personal experience about the increased traffic flows from traffic cutting through to and from Connecticut Avenue. While the GMP concludes that there would be "no disproportionate routing of traffic to disadvantaged areas or ethnic neighborhoods," it says nothing about the actual re-routing of traffic to the surrounding neighborhoods on either side of the park, none of which are disadvantaged or ethnic. Nor could it because no contemporaneous traffic study was done. The failure to analyze this issue is again a fatal defect in the GMP. (rocr0372.006)

**Representative Comment 4:** I live on Daniel Road near Beach Drive. Every Saturday and Sunday, I see dozens of cars, driving to the gate closing the park and turning back, asking about other ways to get around. Now, if 5 to 8 cars a minute on a weekday were to do the same, it would not only create more confusion, but also congest the streets around Beach Drive, endangering our children, increasing the possibility of accidents, and polluting a residential area. (rocr0490.002)

**Representative Comment 5:** The EIS fails in two principal ways to adequately disclose safety and traffic impacts on neighborhood streets that will absorb traffic diverted off Beach Drive. First, you chose not to address any impact on neighborhoods in Montgomery County, Maryland. By your own terms, you looked only for impacts south of the Maryland/District line. This was inappropriate. CEQ regulations require the agency to describe the areas affected by the alternatives under consideration. Maryland neighborhoods, such as mine, will be directly impacted by the proposed closure of Beach Drive, because the northernmost gate closes the road at our doorstep. Traffic traveling south on Beach Drive from the East West Highway that encounters a gate, or traffic trying to get to Beach Drive to go north will cut through Montgomery County neighborhood streets to get back to a major Montgomery County artery. This proposal affects Montgomery County residents and you have a legal obligation to study and disclose those impacts. I believe the EIS is fatally flawed by this omission.

Second, the traffic analysis you do perform is inadequate, especially as regards neighborhood impacts. CEQ regulations make clear that economic and social effects of the proposed action must be analyzed. Your analysis of the safety and social aspects of traffic impacts is very perfunctory. NPS conducted very few actual traffic studies, none in Maryland neighborhoods. Its modeling is based on assumptions about how traffic will behave that are dated, untested, inapplicable, and in some cases just plain silly. For example, in the silly and untested category, you assume that all drivers will simply and uniformly move to 16th Street or to Connecticut Avenue. Drivers who do not know about the road closure, or who miss the rush hour window, and who are therefore probably late, disoriented, and annoyed will most certainly be racing through our neighborhoods trying to get back to a familiar major artery. It is also foreseeable that many drivers excluded from Beach Drive will simply, and perhaps regularly, travel down Beach Drive to Pinehurst and Daniel Road and cut through to Western Avenue or travel down Leland or Woodbine Streets to



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Brookville Road. We live there and we know that this happens. The EIS does nothing to reveal or analyze those reasonably foreseeable impacts on neighborhood streets and is therefore legally vulnerable.

Given that a high percentage of traffic accidents and fatalities occur on neighborhood streets, and that the victims of these accidents are disproportionately senior citizens and children, the neighborhoods deserve an honest, realistic, on-the-ground assessment and disclosure of the impacts of the proposed road closure, including increased traffic volumes and increased accident and fatality rates associated with those increased traffic volumes. The EIS did not provide any of this and is therefore legally vulnerable. (rocr3028.005 and 006)

**Response:** The National Park Service conducted a supplemental traffic study in June 2004 to specifically address effects on nearby streets during the mid-day period when Beach Drive would be closed under Alternative D. The results of this study were incorporated into the final environmental impact statement. The analysis of impacts in neighborhoods in the final environmental impact statement also was based on year 2003 traffic counts from the Maryland-National Capital Park and Planning Commission and 2001 traffic counts from the District of Columbia, Department of Transportation.

Following implementation of any of the alternatives, the National Park Service would work with cities to monitor neighborhoods of concern and coordinate with local groups to ensure that an increase in traffic on residential streets around the park did not occur in the long term. If problems were documented, the National Park Service would work with the city and neighborhood to develop effective solutions. For example, signs could be posted that would inform motorists of the closures and forestall their intent to enter the park on Beach Drive during closure periods. Other signs could direct disoriented drivers back to arterials without using residential streets. If undesirable patterns developed, such as that described in Representative Comment 3, traffic calming devices could be installed that would provide complete access to residents but would slow and inconvenience other drivers to the extent that they would choose other routes.

### **Issue 4: Traffic Analyses Were Inadequate, Incomplete, or Contained Errors**

**Representative Comment 1:** As you will note from the enclosed correspondence, [a number of my constituents] are particularly concerned that [Alternative D] would divert traffic into communities surrounding the park and create safety hazards. Moreover, they assert that the draft Environmental Impact Statement failed to adequately evaluate weekday traffic volumes for the preferred alternative in these neighborhoods. Indeed, it is my understanding that the draft plan only analyzed weekday traffic volumes for alternatives A, B, and C.

I ask that you give these concerns full and careful consideration and that the Park Service undertake additional traffic studies in these communities so that the full impacts of this proposal can be thoroughly and thoughtfully evaluated. (U.S. Senator Paul Sarbanes rocr2995.001)

**Response:** Alternative D was adequately analyzed. Consistent with Council on Environmental Quality (CEQ) guidance for implementing NEPA, information that was presented for the other alternatives was not repeated. Instead, the reader was referred to the previous analyses for alternatives that would have the same effects.

As described in the response to Issue 3, impacts on neighborhoods were reevaluated and updated in the final environmental impact statement using current traffic data from the District of Columbia, Department of Transportation; Maryland-National Capital Park and Planning Commission; and a 2004 traffic study conducted by the National Park Service.

**Representative Comment 2:** The GMP states that "nearby street intersections would be operating well below their capacities during the mid-day period.... While the diverted the mid-day traffic would be perceptible on some city streets, it would not cause any changes in levels of service or in traffic-related community character." At the same time it says that there would be a 20% reduction in traffic along Beach Drive between Joyce Road and Broad Branch Road. That 20% of traffic has to go somewhere. The logical places for it to go are first, along Broad Branch Road, and second through Forest Hills to Connecticut Avenue. Both of these problems have received insufficient consideration under the GMP, which is based on a long-outdated traffic study (1990). The model to which that data is then applied "has [not] been developed and validated . . . [for] corridor studies such as the Rock Creek Park project." (rocr0372.003)

**Response:** The supplemental traffic study conducted by the National Park Service in June 2004 analyzed traffic diversions in this area if mid-day closures of Beach Drive between Joyce Road and Broad Branch Road were implemented. The results were incorporated into the final environmental impact statement.

**Representative Comment 3:** The analysis of traffic impacts, as shown on pp. 263-264 of the draft GMP, appears to us to have exaggerated the impacts of Alternative D (and, most likely, the other alternatives) in 2020. Given the weight placed on traffic impacts in this debate, it is important that this element of your analysis be correct.

The primary problem appears to be calculations of traffic diverted from Beach Drive along the segment from Joyce Road to Broad Branch Road. Table 28 predicts that under Alternative D, a maximum of 970 vehicles per hour would be diverted in the midday period relative to Alternative B in 2020. Based on Table 29, these vehicles would presumably be diverted to Connecticut Ave., Wisconsin Ave., 16th Street, Georgia Ave., and Broad Branch Road. (The other routes listed in Table 29 all feed into one of these, so adding their totals would presumably double count diverted traffic.) Summing the vehicles on these diverted routes for Table 29 totals 1,840 vehicles per hour, much more than the 970 vehicles per hour available to be diverted. Table 29 also fails to allocate any of the diverted traffic to Ross Drive and Glover Road, further exaggerating the potential impacts on streets outside the Park.

The predicted traffic diverted to Broad Branch Road and Blagden Avenue are potentially the biggest traffic impacts associated with Alternative D. The draft GMP concludes (following Table 29 on p. 264) that "traffic volumes would more than double" on these two roads. Here, too, the number diverted exceeds the amount available to be diverted. Since both of these roads are described as being very sensitive to small changes in traffic, this seems to be an important inconsistency.

Several other elements of the analysis appear to be flawed:

a) Beach Drive, from Joyce Road to Broad Branch Road, is expected to have 970 vehicles per hour at the midday peak. This is larger than the projected AM rush hour peak of 800 cars shown in Table G.2.

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b) Beach Drive, from Bladgen Avenue to Rock Creek Parkway is projected to have 3000 vehicles per hour at the midday peak. This is larger than projections of both the AM and PM rush hour peaks shown in Table G.2.

c) In all cases, the analysis projects 8.3% of Average Daily Traffic for the midday peak; 5% would be more typical, according to PARC's transportation consultants at ICF Consulting. Use of 8.3% leads to projected volumes during midday periods that are above the AM rush hour peak and close to or above the PM rush hour peak in all cases along Beach Drive. (ICF's critique of the GMP's traffic analysis was provided to Patrick Gregerson of NPS by e-mail on May 23, 2003.)

d) The projected midday peak in traffic on Beach Drive occurs between 10:00 AM and 11:00 AM, according to the draft GMP (page 263). This assumption is in striking contrast to the actual traffic counts reported by Robert Peccia and Associates in their traffic study for the Park Service. In discussing hourly traffic variation, the Peccia study concluded that traffic counts between 10:00 AM and 11:00 AM were lower than those for any hour between 7:00 AM and 8:00 PM (Peccia, page 4-6).

PARC believes that some of the public opposition to Alternative D may be attributed to overstated traffic impacts in the draft GMP. We urge the Park Service to carefully examine its traffic analysis and revise its conclusions where appropriate. (rocr2925.022 and rocr2925.023)

**Response:** The June 2004 traffic study conducted by the National Park Service was designed to address these specific issues. The results were incorporated into the final environmental impact statement.

**Representative Comment 4:** Inadequate Traffic Studies and Failed NEPA Analysis: Numerous findings demonstrate that [the NPS] has failed to meet these obligations required by NEPA.

1. While an estimated approximately seven cars per minute use upper Beach Drive during the workday, the Park has failed to model cut through traffic impacts on residential neighborhood roads. The draft EIS dismisses the potential for massive cut-through traffic in neighborhoods, but there are no data to substantiate this assertion.
2. The draft EIS fails to evaluate weekday traffic volumes for Alternative D, the Park's 'preferred alternative.' (Page 337)
3. The EIS uses traffic data collected in 1990 to assess traffic impacts, but this model is faulty as it is designed to evaluate regional traffic issues rather than impacts on corridors or neighborhoods. While the NPS attempted to make adjustments to improve its modeling, expert testimony presented at the May 22 hearing refuted the model's validity.
4. Neighborhoods already experience significant cut-through traffic on weekends when Beach Drive is closed. Despite this actuality, the EIS makes the erroneous assumption that workday traffic will instead choose major corridors such as Connecticut Avenue and 16th Street. These corridors, already overburdened with traffic, will be poor alternatives for those seeking an efficient route downtown.
5. According to AAA, rush hour is not limited to hours before 9:30 a.m. and after 3:30 p.m. Projections indicate that future rush hours will extend well into the 9:30-3:30 hours.

6. The NPS has not performed a detailed analysis of the extent to which closing Beach Drive during these workday hours would enhance recreational opportunities and actual use of the park. (rocr2998.002)

**Response:**

1. Analysis of impacts on neighborhood roads is addressed above under Issue 3. The final environmental impact statement was revised to include more extensive analyses based on the most current data available.
2. Weekday traffic volumes for Alternative D were evaluated on pages 262 through 266. Because the effects of Alternative D would be identical to those of Alternative B during peak hours and identical to those of Alternative C during the 6-hour closure period, there was no need to add Alternative D to the Appendix G tables, which started on page 337. In the final environmental impact statement, the Appendix G tables were revised to include the results for Alternative D.
3. The traffic data were evaluated in 2002 to confirm their continued applicability. The details of this analysis were provided in pages 341 through 348 of the draft environmental impact statement. The model has been appropriate since it was first applied to this study in 1996 and National Park Service has not made any adjustments.
4. These corridors have surplus capacity during the mid-day workday hours when Beach Drive closures would occur under Alternative D. They would provide excellent alternatives for those seeking an efficient route downtown. As demonstrated in the June 2004 traffic study, some of these routes are more time-efficient than routes that involve Beach Drive, even during rush-hour periods.
5. The hours of closure for Beach Drive segments were selected to generally correspond with the lane reversals on the Rock Creek and Potomac Parkway. They were not intended to correspond to the American Automobile Association's (AAA's) identification of rush hour.

As described on page 95 of the draft general management plan, one possible closure configuration for Alternative D was evaluated in the environmental impact statement. The draft document makes clear that the locations and timing of closure may be adjusted to improve the effectiveness of this alternative in meeting the goals that were listed on page 95.

6. A discussion of recreational opportunities and actual use of the park were addressed as Issues 9 and 10 under the heading "Traditional Park Character and Visitor Experience."

**Representative Comment 5:** The first deficiency is the plan lacks analysis of traffic impact on neighborhood roads. A proposition that the rerouted traffic does not impact neighborhood roads is without basis. The plan states that the NPS did not study neighborhood roads, page 346. (rocr3040.004)

**Response:** As stated on page 346 of the draft environmental impact statement, "it was not practical to attempt to model local roadways which carry very low traffic volumes. In order to model

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these low volume roadways, zones sizes would have to be greatly reduced and many more roadways would have to be included.”

The final environmental impact statement was revised include analyses of impacts on neighborhood roads. However, modeling was not performed.

### **Issue 5: The Model Used for Traffic Analyses Was Not Appropriate**

**Representative Comment 1:** The EIS contains no real independent traffic studies. It simply relied on an adapted version of the model employed by the Council of Governments. The COG model is not suited to assess traffic impacts at the local and neighborhood level required by the preferred alternative. Furthermore, the COG model uses outdated traffic counts from the early 1990's. I urge you to give careful consideration to expert testimony presented by traffic engineers on this subject. If left uncorrected, it appears the egregious failure to conduct thorough independent traffic studies presents a significant legal exposure for the Park Service. (rocr0822.003)

**Representative Comment 2 :** The EIS uses traffic data collected in 1990 to assess traffic impacts, but this model is faulty as it is designed to evaluate regional traffic issues rather than impacts on corridors or neighborhoods. While the NPS attempted to make adjustments to improve its modeling, expert testimony presented at the May 22 hearing refuted the model's validity. (rocr2998.002)

**Representative Comment 3:** It's clearly stated in Appendix H (p. 346) that “it was not practical to model local roadways.” NPS attempted to apply the MWCOG regional traffic model to local conditions. For the engineering firm of Robert Peccia & Associates to state that the MWCOG traffic model was “valid for the analyzing the GMP alternatives” suggests either ignorance or gross negligence to the point of malpractice. (rocr2945.006 and rocr0309.008)

**Response:** No changes were made in the modeling because of these types of concerns. The Metropolitan Washington Council of Governments is the agency in the Washington, D.C. area that is responsible for regional planning and traffic modeling. Its transportation model, which was used for the analysis of the Rock Creek Park alternatives, is well suited for assessing traffic impacts at the local and neighborhood level. This model was designed to evaluate impacts on road segments as small as a single block and is routinely used for this purpose by the Metropolitan Washington Council of Governments and others. The effects on more than 80 road segments in and around Rock Creek Park were modeled to determine effects on neighborhoods and corridors. The results were included in Appendix G of the draft environmental impact statement.

The multiple traffic analyses that were performed in association with preparing this general management plan each used the most recently available traffic data at that time. As described in Appendix H, the traffic analysis originally was performed in 1996 using data from 1990. It was run again in 2002 using the then-most-current traffic counts from the Washington D.C. Department of Public Works, which dated from 1999. These were the results that were used in the draft environmental impact statement.

The National Park Service conducted another round of traffic counts in June 2004. It also obtained the most recent traffic counts available from the District of Columbia, Department of

Transportation (2001) and the Maryland-National Capital Park and Planning Commission (2003). The analyses in the final environmental impact statement were based on these data.

Oral presentations at the public hearings were limited to 3 minutes per speaker, which would have been insufficient to describe this highly technical model, much less present expert testimony regarding its validity. The concerns identified by PARC's transportation consultants at ICF Consulting were included under the heading "Issue 4: Traffic Analyses Were Inadequate, Incomplete, or Contained Errors" and were addressed by the June 2004 traffic study.

#### **Issue 6: Effects on Major Roadways Were Insufficiently Considered**

**Representative Comment 1:** Any new vehicular restrictions on Rock Creek Park's roadways would divert substantial traffic to other existing major north-south routes in the city, such as 16th Street, 14th Street, Connecticut Avenue, Massachusetts Avenue, and Wisconsin Avenue. Such restrictions would add even more congestion to already severely 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. (rocr0374.004)

**Response:** These corridors have surplus capacity during the mid-day workday hours when Beach Drive closures would occur under Alternative D. They would provide excellent alternatives for those seeking an efficient route downtown. As demonstrated in the June 2004 traffic study, some of these routes are more time-efficient than routes that involve Beach Drive, even during rush-hour periods.

Even under the permanent closure associated with Alternative C, effects would be measurable but would not change levels of service. The peak-hour traffic on Beach Drive is about 700 vehicles. Peak hour counts on some of the roads mentioned in this comment are 16th Street – 2,800, Connecticut Avenue – 3,400, Massachusetts Avenue – 2,800, and Wisconsin Avenue – 2,600. If all traffic diverted from Beach Drive took only these four roads, it would increase their traffic loads by 5 percent, with modeled numbers ranging from about 2 percent to 8 percent (see Table G.2 in the final environmental impact statement). As shown in Table G.3, levels of service between Alternative B and Alternative C would be the same on all of these roads during both rush hours except for Wisconsin Avenue south of Calvert, which would have a one-step decline in level of service during the morning period.

**Representative Comment 2:** Since the City is in the midst of a two year long construction project on 16th Street, closing the park during the day will create additional gridlock and pressures on local streets. (rocr1754.002)

**Response:** The referenced project has been completed. However, the document was modified to include ongoing road improvements to the connected, cumulative, and similar actions that were evaluated for each alternative.

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### **Issue 7: Effects on Alternative Transit Modes Were Insufficiently Considered**

**Representative Comment 1:** We are a car-oriented society, and the only way to get people to consider using public transportation, car-pooling or commuting by bicycle is to make traveling in a single occupancy vehicle an inconvenience. It has worked well in other places. (rocr0523.004)

**Representative Comment 2:** As traffic congestion continues to increase in the Washington area, policies are needed to encourage non-motorized travel. Weekday recreation zones on Beach Drive would encourage alternative transportation modes such as bicycling. (rocr0551.011)

**Representative Comment 3:** Restricting access [on Beach Drive] to bicycles and other non-motorized traffic would help to relieve automobile traffic issues elsewhere by allowing bicyclists a safe place to ride. (rocr0661.002)

**Representative Comment 4:** By closing these sections, Alternative D will create an unbroken paved path from Memorial Bridge to the Maryland line, linking the Park to an expanding regional network of paved trails that local authorities and the Park Service have spent tens of millions of dollars developing. Currently, these trails run from Mount Vernon to Lake Needwood, via the Park, except for the missing sections; from Georgetown to Rosemary Hills via Bethesda; and from Key Bridge to Purcellville, VA. Planned trails will connect the existing network to Silver Spring, Takoma Park, Brookland and Capitol Hill, as well as the Anacostia waterfront. Closure of Beach Drive also connects the two ends of the Capital Crescent/Georgetown Branch Trail, forming a 21-mile loop that is virtually car-free, expanding the possibilities for recreational visits to the Park. (rocr2925.005)

**Response:** Comments were noted. While the National Park Service advocates and supports the development of connecting paths for recreational purposes, we recognize that they can provide multiple functions as part of the transportation infrastructure of the city and region.

### **Issue 8: Effects with Broad Branch Road Improvement Project Were Insufficiently Considered**

**Representative Comment 1:** Several years ago the city proposed rebuilding Broad Branch Road in its entirety by raising the street level 7', placing Jersey barriers along the side, raising the speed limit, and removing approximately 120 mature trees. The City's proposal was shelved after opposition from FHCA, local citizens and ANC3F. We can almost be certain that this project, which would negatively impact a 2 mile stretch of road immediately next to Rock Creek Park (the Park starts at the east edge of Broad Branch Road), will be revived to relieve newly caused congestion. Yet the GMP makes no mention of this problem in its evaluation. The failure to consider the impact of traffic on Broad Branch Road is a fatal defect in the GMP. (rocr0372.005)

**Response:** Information on the Broad Branch Road Improvement Project was obtained from the District of Columbia's Department of Transportation. In the final environmental impact statement, this project was included in the section "Connected, Cumulative, and Similar Actions" and included in the cumulative analysis of impacts on local and regional transportation.

**Issue 9: Impact Intensities Are Not Consistent**

**Representative Comment 1:** When you look at page 264, look at Blagden Avenue where there would be 500 vehicles at the maximum non-peak hour increase which is for some reason characterized as a minor increase in traffic. Compare that to when they characterize the traffic increase at Connecticut Avenue, north of Tildon, 500 vehicles is said to be a perceptible increase in traffic.

Not being a traffic engineer but being a student of the English language, I don't understand those two statements. They seem rather contradictory particularly given that both of those areas are very common in the sense of having very heavy traffic. An additional 500 cars is quite a lot of cars. (rocr3056.002)

**Response:** The map on page 203 of the draft general management plan and environmental impact statement is entitled Alternative B Year 2020 Average Weekday Traffic Volumes. As shown on this map, Connecticut Avenue north of Tilden Street in 2020 would carry an estimated 47,500 vehicles per day while the traffic load on Blagden Avenue is estimated at 9,400 vehicles per day. Under Alternative D, as shown on table 29 on page 264, the increase in the *actual* number of automobiles on these two road segments compared to Alternative B would be the same. However, the *relative* change in the number of automobiles would be different. This difference in relative change was noted in the table.

Identification of the relative changes between traffic levels in Alternative B and the action alternatives were added to the final general management plan and environmental impact statement. The traffic changes were reexamined based on the definitions and were modified as necessary to reflect the definitions.

**Issue 10: Cost versus Benefit Analyses for Traffic Management Are Needed**

**Representative Comment 1:** There has been no study of the costs vs. the benefits of closure. (rocr0756.002)

**Response:** As demonstrated in tables 5 and 6 in the general management plan, the costs of the alternatives are a consideration. However, the National Park Service does not prepare typical cost versus benefit evaluations for management actions because they deal more with quality of life issues than absolute costs. The purposes of national parks, including Rock Creek Park, include protection of resources and visitor enjoyment. These factors are not amenable to cost versus benefit analyses.

**Issue 11: Time Period Used in Alternative D to Avoid Rush Hour Is Wrong**

**Representative Comment 1:** The GMP is also flawed in assuming that the morning rush hour ends at 9:30 a.m. Again those of us who live in Forest Hills base this on our first-hand observation and experience over many years. (rocr0372.009)

**Representative Comment 2:** According to AAA, rush hour is not limited to hours before 9:30 a.m. and after 3:30 p.m. Projections indicate that future rush hours will expend well into the 9:30-3:30 hours. (rocr2998.002)



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**Response:** The hours of closure for Beach Drive segments were selected to approximately correspond with the lane reversals on the Rock Creek and Potomac Parkway. They were not intended to precisely define rush hour. However, traffic counts performed in June 2004 demonstrate that traffic on Beach Drive peaks during or before the 8:00 a.m. hour, decreases by 9:00 a.m., and reaches its relatively low mid-day level by 10:00 a.m. In the afternoon, traffic starts to increase about 2:00 and is approaching peak levels by 4:00.

### **Issue 12: Additional Consideration Is Required for High-Occupancy Vehicle Requirements**

**Representative Comment 1:** The effects of two-way traffic and the effects of HOV restrictions on the parkway on the surrounding streets was not clear. How would two way traffic impact the Conn. Ave./Calvert St. area during peak hours. This was not evident in the GMP. Both of these analyses are necessary to make an informed decision. Are the roads around the park operating at capacity during peak times or can they absorb diverted traffic from park roads. The MWCOG predicts a 70% increase in traffic by 2020 regardless of any traffic management actions taken in the park. (rocr2981.009)

**Response:** High-occupancy vehicle requirements were eliminated from Alternative A in the final general management plan, so that impacts related to this alternative are no longer relevant.

The modeling results for Alternative C that are provided in Appendix G include the effects of high-occupancy vehicle requirements. They show that south of Cathedral, average daily traffic levels on Connecticut Avenue in 2020 would be about 6 percent higher than those that would occur with Alternative B, no action alternative. During rush hour, they would be about 8 percent higher. However, this would not result in a change in rush-hour levels of service: they would be rated at “D” during the morning and evening periods for Alternatives B and C.

**Representative Comment 2:** Alternative A: HOV restrictions will force many cars onto city streets. Based on my observations for 25 years as a commuter, 16th and Georgia will be more crowded than your study indicates. (rocr0484.002)

**Response:** Comment noted.

### **Issue 13: Use Current Data and Reassess Effects for Woodley Park**

**Representative Comment 1:** The WPCA believes also that any assessments of the effect of the Draft Plan’s Alternatives on traffic in Woodley Park included in existing Environmental Impact Statements are out of date and inaccurate.

The WPCA therefore requests that the final Environmental Impact Statement include an assessment of the effects of Alternatives on traffic efficiencies and intersection grades for the following Woodley Park intersections: Connecticut Avenue and Calvert Street; Connecticut Avenue and Woodley Road; Connecticut Avenue and Cathedral Avenue; Calvert Street and 24th Street; and Calvert Street and 29th Street. (rocr2858.002)

**Response:** Traffic effects were modeled for roadway segments, not for intersections. The tables in Appendix G provide data for Connecticut Avenue from the District of Columbia/Maryland line to Dupont Circle and includes all of the intersections identified in the comment. Average daily

traffic counts were updated using the most recently available values (2001) from the District of Columbia, Department of Transportation. As described in Appendix H, the modeled values for 2020 are still valid and were not recalculated.

**Issue 14: Traffic Effects Could Be Devastating on Neighborhoods**

**Representative Comment 1:** The proposed plan would divert traffic from Beach Drive through our neighborhood streets onto Brookville Road, Connecticut Avenue, and the narrow residential streets which run between Rollingwood and the VMA, Estimates run as high as 3,000 to 4,000 diverted vehicles per day, which would be devastating to the safety and tranquility of small residential area such as Martin's Additions. (rocr1803.001)

**Response:** The June 2004 traffic study by the National Park Service determined that traffic on Beach Drive segments between Broad Branch Road and the Maryland line ranged between 5,400 and 7,600 vehicles per day. During the Alternative D mid-day closure period, fewer than 1,700 vehicles, or about 5 vehicles per minute, would be diverted onto multiple routes on both sides of the park. Effects such as those anticipated in this comment would not occur.

**Issue 15: Traffic Concerns of Area Residents Are Unfounded**

**Representative Comment 1:** Adjacent residents complain about an increase in local traffic. This complaint is specious and more indicative of their own advantage in the status quo, than long term disadvantage due to a closure. In fact, the natural consequence of closure of Beach Drive would probably be less collateral side-street traffic because fewer commuters would be using Beach Drive in the first place. Furthermore, it will not take long for commuters to realize Beach Drive has been closed and to find alternate routes. The complaints of nearby residents are simply because they themselves will face longer commute times if forced to use 16th St., East West Highway, Connecticut Ave, and other routes to get to and from work, which will impact their property values and quality of life. (rocr1393.003)

**Response:** Comment noted.

**Issue 16: Effects on Entry to the Park Were Insufficiently Characterized**

**Representative Comment 1:** If the NPS opted to close Beach Drive during the week (9:30 am - 3:30 pm, Monday - Friday), all Rock Creek Park users north of Military Road would be required to drive (up to 50 city blocks) to access open areas of Rock Creek Park through the remaining entrance ways at Military Road in the District of Columbia. (rocr0384.002)

**Response:** Unlike the weekend closures, Bingham Drive and Sherrill Drive would not be closed on weekdays under Alternatives C or D. Therefore, drivers north of Military Road could access the park from several entrances. There also would not be any impediments to travel across the park between the east and west sides of the city.

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### Issue 17: Consider Public Transit

**Representative Comment 1:** I would take issue with the statement that there are excellent public transportation opportunities in the area near Beach Drive. They won't be that helpful in reaching the recreational spots, like picnic Groves 3 and 4 or groves 7 through 10. (rocr2769.024)

**Response:** The environmental impact statement is focused on differences among alternatives rather than problems perceived with all alternatives. There would not be any differences among the alternatives in visitors' ability to reach park facilities from public transportation stops.

### Issue 18: Transit Alternatives and Regional Transit Planning Are Needed

**Representative Comment 1:** Due to the ever-increasing number of vehicles on the roads, in the near future the surrounding roads will become just as congested as they might become were the parks roads closed now. Either way, at some point the D.C. government is going to have to take steps to address this inevitable problem, and there is simply no reason for the Park Service to sacrifice the park simply in order to delay this day of reckoning. (rocr2751.003)

**Representative Comment 2:** The logic of the arguments against any closing of Beach Drive suggests that we should turn the whole length of Beach Drive into a four-lane highway. However, Rock Creek Park and Beach Drive were not set aside more than one hundred years ago in order to ease traffic congestion on the streets of the District today. The only long-term solution to traffic congestion is to find alternatives to our society's heavy reliance on the automobile. (rocr2755.002)

**Representative Comment 3:** Perhaps consideration of any change in the usage of the roads in Rock Creek Park should wait until better coordination of traffic plans between the District government and the Park Service can take place. Use of traffic calming devices, one way directional signs, or other means to limit the impact of the Park's closure on the surrounding neighborhoods might make the proposals in your General Plan less objectionable. However, as the proposals now stand, I am opposed, and would support any efforts of my neighbors and our elected representatives to halt them. (rocr2759.001)

**Representative Comment 4:** Montgomery County is encouraging commuters and other drivers to travel in off-peak hours when roads are less congested. Closing Beach Drive at 9:30 am would discourage those who can travel during this later hour. (rocr2975.004)

**Representative Comment 5:** Until we effectively address our region's traffic congestion problem, I simply cannot support measures that run the risk of making matters worse. (U.S. Representative Chris Van Hollen, rocr2994.004)

**Response:** Comments were noted. The National Park Service regularly works with district, state, local, and federal transportation agencies throughout the area to address regional traffic problems.

### Issue 19: Previous Short-Term Closures Can Indicate Long-Term Impacts

**Representative Comment 1:** During the periods when the Park has been blocked during the week (i.e. bridge repair) the other routes into D.C. have been seriously impacted. (rocr1461.002)

**Representative Comment 2:** Several years ago, when work on the zoo tunnel closed a long stretch of the park, it was glorious. And guess what? The drivers found other ways to get where they wanted to go. (rocr1460.002)

**Response:** Comments were noted.

#### **Issue 20: Previous Permanent Closures of Other Roads Can Indicate Long-Term Impacts**

**Representative Comment 1:** The supposed traffic burden is really imaginary. When they closed Pennsylvania Avenue in front of the White House, there was all of this political uproar for a short while. Basically there hasn't been any significant difference, and the problem seemed to have gone away. (rocr3073.002)

**Response:** Comment noted.

#### **Issue 21: Weekends Demonstrate What Weekday Effects Will Be**

**Representative Comment 1:** A trial period is unnecessary given that the differences in weekend and weekday cut-through traffic have already been measured by Montgomery County. It doesn't take a traffic engineer to interpret the results. Traffic volumes increase by nearly 50% on neighborhood streets when the NPS closes Beach Drive at the DC line.

Hence, it's intuitively obvious why the NPS can state with confidence that the relative change in traffic volumes would be negligible on arterials such as Wisconsin, Connecticut, and Georgia Avenues, and 16th Street; because the unmodeled neighborhood streets would bear the majority of the burden for carrying the diverted traffic. (rocr2945.007 and rocr0309.010)

**Response:** Comment noted. The traffic counts referenced here were obtained from the Maryland-National Capital Park and Planning Commission and incorporated into the analysis in the final environmental impact statement.

#### **Issue 22: More Study Is Needed before Traffic Management Is Implemented**

**Representative Comment 1:** More study. A number of recommendations in the GMP need further study before they can be recommended for implementation. These suggestions deserve further evaluation:

- Parkway closings. Develop and test some of the park road closing strategies described in Alternative D to more fully measure their impacts on visitation, interpretation, natural and cultural resource management and wildlife habitat.
- HOV-2. Study in greater depth the potential of HOV-2 strategies to reduce commuting volumes without impacting the scenic and historic character of the parkway.
- Traffic calming devices. Investigate the use of traffic calming devices that Alternative A proposes in a manner that will preserve the historic nature of the park roadways. Test these devices in selected locations to identify the most appropriate and effective ones.

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- East-west congestion. Conduct a study of possible measures for mitigating east/west traffic congestion. (rocr3030.007)

**Response:** Traffic management concepts were considered in developing the current range of alternatives, which is an appropriate level of analysis for a general management plan. Traffic planning and engineering studies would be prepared before any of the actions identified in the general management plan were implemented.

### **Issue 23: Can Park Funding Legally Support Local Transportation Needs?**

**Representative Comment 1:** I always thought that it was illegal for one Federal agency to enrich another Federal agency through transfer of assets without the expressed consent of Congress. For example, the Department of Health and Human Services, without Congressional authorization, may not divert its appropriated funds to the National Park Service to build a nature center. The same principle may apply to the diversion of resources from Federal agencies to state and local governments. I believe it is unethical for the National Park Service to knowingly permit the diversion its resources to meet local transportation needs at the expense of park users. What I do not know is whether or not continuing to allow the unintended diversion of a park road to meet local transportations needs is illegal. The NPS has established that Beach Drive has become a local commuter route at the expense of park users. Before the National Park Service chooses an option that would continue to allow park roads to be used primarily for local commuters, the NPS should request a competent legal advisory opinion. (rocr0370.003)

**Response:** Comment noted. NPS management actions for Beach Drive and other park and parkway resources have been and will continue to be in compliance with all laws, regulations, and NPS policies. See the “Servicewide Mandates and Policies” section on page 15 of the draft general management plan and environmental impact statement.

### **Issue 24: Public Comment Is Needed for Traffic Calming Measures**

**Representative Comment 1:** Before any traffic dampening measures can be taken, there must be an opportunity for public comment on such measures. (rocr3140.003)

**Representative Comment 2:** Unlike the other alternative issues which have been spelled out in some detail the traffic dampening is something that is unclear. When I asked Adrienne Coleman about it, up front she indicated that the specifics of traffic dampening would be something that would happen.

If they are going to do traffic dampening, certainly they should study it. Then they should have the process open just as this process is open. There should be a proposal and an opportunity for comment by the people just as we’re having these comments. (rocr3056.003)

**Response:** The superintendent has the authority to implement many traffic calming measures, such as setting speed limits or installing speed tables or grooved centerlines. The superintendent would obtain input and professional designs from traffic planners and engineers prior to implementing any of these measures. The National Park Service also would coordinate with local departments of transportation, including their traffic safety engineers.

For traffic calming actions that would involve construction, the National Park Service would evaluate the need to prepare a compliance document under the National Environmental Policy Act. This decision is based on a standardized, legally defensible checklist and analysis process. If the need for an environmental assessment or environmental impact statement was indicated, opportunities would be provided for agency and public review and comment.

## **COMMUNITY CHARACTER, INCLUDING ENVIRONMENTAL JUSTICE**

### **Issue 1: Environmental Justice**

Several of the comments received regarding community character used such terms as “elitist and class based, and it is wrong” to describe one or more of the alternatives. However, others gave a substantive explanation of why they thought proposed management approaches could have environmental justice implications. All comments in the latter category are presented below.

**Comment 1:** I would like to propose Alternative E - Rock Creek Park for everyone! How about a shuttle bus on weekends to carry people from Columbia Heights and Cleveland Park metros down to the beginning of the closed section of Beach Drive?

While minorities do use the park for special occasions, large picnics etc. one almost never sees them otherwise. I know that many people in my neighborhood do not even know the park exists. I would love to see more park orientation events to familiarize all DC residents with the wonders so available here.

I know there are ranger walks and programs in the park already, but many people over here do not read the Washington Post, where they are listed, don't know how to get to the park or have no transportation, and wouldn't feel comfortable anyway. I've never seen any programs offered in Spanish.

Instead of putting money into a visitor center in the Peirce Mill Barn - how about a nature center bus to travel around the city making people familiar with the park, handing out maps, encouraging them to visit and showing them how to get there? (rocr0935.007)

**Comment 2:** In order to address people's legitimate concerns about access, I feel that public transportation should be added to the park. At present there are no buses that conveniently serve the heart of the Park (the H2 and H4 come close, but let people off in very pedestrian hostile areas). And there is no transportation whatsoever to the part of the Park that will be closed. This seems a major and regrettable oversight that lends credibility to the notion that the Park is only for the wealthy neighborhoods that border it. (rocr1817.002)

**Comment 3:** With implementation of Alternative C or Alternative D, the park would in effect be limited to individuals who live near the park and who are physically able to walk/bike into the park. Since property values are higher along the park than in neighborhoods especially east of the park, this action would be very discriminating to city residents who need to leave their cramped apartments and crowded neighborhoods for a quick drive to the park for some relief of the heat and density of the city. How will a mother of three living on Capitol Hill, or an elderly couple living east of Adams Morgan access the park during non-rush hours if they cannot drive there to then relax and enjoy the sounds and sights of the park? (rocr2757.002)

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**Comment 4:** By limited access to a select group of bikers and walkers who live near the park is very discriminating since property values along the park are much higher. (rocr0803.002)

**Comment 5: IMPACT ON ADJACENT COMMUNITIES.** Much has been stated during the public comment period about impacts from changes in the status quo for adjacent neighborhoods as it relates to motorized traffic. Less publicized has been the effect of balancing motorized and nonmotorized visitor access for neighborhoods in which there is relatively low automobile ownership, as is the case in the District of Columbia neighborhoods of Adams Morgan and Mount Pleasant which are adjacent to the eastern border of the Park. In these densely populated neighborhoods, the 2000 Census documented that about 50% of the households did not have access to a car. Unless some provision is made for nonmotorized visitation to Rock Creek Park Monday through Friday, these Park neighbors will be unable to access the heart of the Park Monday through Friday. The need for access to the Park for persons without automobiles was documented in the 1918 Rock Creek Park Study conducted by the Olmstedes. This need remains unmet today. (rocr0837.006)

**Response:** The response to environmental justice comments 1 through 5 is “Comments were noted.” However, the writers should be assured that their comments will be considered further in the development of plans that will tier from this general management plan, including the park interpretive plan and trail plan. The National Park Service will continue to include environmental justice in its consideration of management approaches for the park to ensure not only that disadvantaged groups do not experience disproportionate adverse affects, but that NPS policies and actions promote including these groups in the benefits of the park.

**Comment 6: ACCESS.** The Park urgently needs to restore, enhance, or construct non-motorized trails into the Park from the communities along its entire eastern boundary. The lack of sufficient safe, welcoming, and maintained non-motorized access at numerous key sites along the east side of the Park is a major environmental injustice that severely under-mines the park's value and significance in the lives of tens of thousands of people living in the city's most diverse neighborhoods. (rocr0315.001)

**Response:** The east side of the park is very steep and it is difficult to find areas of moderate slopes to provide pedestrian and bicycle access without producing adverse effects on park resources. The National Park Service has already identified the installation of a new trail along Piney Branch Road as a goal to be completed under this general management plan. As it develops more specific plans that will tier from the general management plan, the National Park Service will consider other opportunities to improve access to the park from the east.

**Comment 7:** There's a problem which I haven't seen addressed which is that the zoological garden has put a fence on the east side of Rock Creek blocking access of the residents of Mount Pleasant and Adams Morgan to Rock Creek.

I don't believe that the zoological garden actually extends to the east bank of Rock Creek. I believe it's on the west bank. That fence should be removed. The fence should be fencing the parking lot and not preventing access of the adjacent residents to the park. (rocr3064.005)

**Response:** The lands in question are not under the jurisdiction of or managed by the National Park Service. However, we will pass this suggestion to the Smithsonian Institute, which manages the zoo.

### **Issue 2: Adverse Effects on Community Character**

**Representative Comment 1:** The second objection is the ability of our community to carry out its daily living activities. Beach Drive is considered a neighborhood road to our community. At all hours of the day we travel to work, go grocery shopping, and do errands using Beach Drive. The ability to perform these tasks in our neighborhood will be unfairly inhibited by alternatives A, C and D. (rocr0608.004)

**Representative Comment 2:** Closing Beach Drive would send more traffic onto Oregon Avenue, making the asphalt path near Oregon no longer a quiet place to walk, jog, or bicycle. (rocr2776.001)

**Response:** Comments were noted.

### **Issue 3: Beneficial Effects on Community Character**

**Representative Comment 1:** Beach Drive is one of the greatest recreational resources in the District, used by thousands of people on weekends. Expanding this opportunity to weekdays would enhance quality of life for people all over the Washington area. (rocr0551.003)

**Representative Comment 2:** Extending the traffic free time in the RCP will only have a positive impact on the community and help to make this the centerpiece of our area as Central Park is to NYC. (rocr0553.001)

**Response:** Comments were noted.

### **Effects on Property Values**

**Representative Comment 1:** Property values in the neighborhoods would go down as a result of restricted access to the Park. (rocr2788.003)

**Representative Comment 2:** I'm not a lawyer, but I'm going to ask mine if this does not constitute a taking if my property values fall because of the change in the traffic patterns. (rocr3051.003)

**Response:** Comments were noted.

## **PUBLIC HEALTH AND SAFETY**

Public health and safety was not an impact topic in the draft general management plan and environmental impact statement. However, the National Park Service received almost 250 comments regarding public health and safety.



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Because of the large number of comments received on public health and safety, it was added to the final general management plan and environmental impact statement. Organizationally, it was added as a new impact topic in both the “Affected Environment” and “Environmental Consequences” sections. Three major areas were included under this impact topic:

- Effects on safety along roadways (which was included in the draft environmental impact statement under regional and local transportation);
- Effects on personal safety; and
- Effects on emergency evacuations.

Many of the previous sections in this comments and responses report presented safety-related comments. Those sections are identified below. None of these comment types will be repeated in this identification of health and safety concerns. Instead, this section will focus on health and safety issues that were not identified previously.

- Inappropriate focus of decision points.
- The need to coordinate safety with other agencies in “Connected, Cumulative, or Similar Actions.”
- The safety benefits of completing a bicycle trail throughout the length of the park.
- The hazards represented by the poor current condition of the existing bike and foot trails, the poor current condition of the shoulder paving of Beach Drive, and the sewer grates in park roadways.
- The unsafe practices of some motorists and cyclists.
- The lack of sufficient safe, welcoming, and maintained non-motorized access at numerous key sites along the east side of the park.
- Health concerns about air and water pollution.
- The safety of children in nearby neighborhoods if park closures result in increased traffic in neighborhoods.

### **Issue 1: Safety of Recreational Users when Traffic Resumes**

**Representative Comment 1:** When the gates would be opened at 3:30 for rush hour traffic to start streaming through, God save the mother with a child in a stroller who's still on one of those stretches of road without a sidewalk or trail. (rocr0309.006)

**Representative Comment 2:** How will the Park Police deal with a wheelchair in the middle of the closed stretch at 3:15 p.m.? Will Beach Drive be left closed until the person clears? What will the rules be if you want to enter for a walk at 3:00 at Broad Branch and return to your car? When you reach Military Road at 3:30 will Beach Drive be kept closed until your return? Will Park Rangers be posted to ask “how long will you be here?” (rocr0372.007)

**Representative Comment 3:** Of primary concern is the safety of visitors as segments of Beach Drive are reopened to motorists each weekday mid-afternoon. The Draft GMP/EIS is not specific as to how this process will be accomplished to safeguard the well-being of visitors. It is stated, however, on page 261 that “Possible mitigation could include having park staff travel each segment before it reopened and warn nonmotorized recreationists using Beach Drive that the road was about to become a commuter highway. However, this approach would require a commitment of time and would limit the availability of park staff for other activities.” Visitor safety is of paramount importance. A firm commitment on the part of NPS to ensure notifying visitors of reopened roads should be stated as well as an action plan to carry out this task. This plan should clearly specify when park officials will begin notification (suggest a half an hour, fifteen minutes and five minute warnings), how this message will be broadcast (use of a standardized message that is magnified), the number of park officials assigned to this task, a specified number of signs posted along Beach Drive at varying intervals, etc. Is there research that supports this alternative of road(s) closure/reopening? If so, what steps have been implemented to ensure visitor safety during reopening? What is the success rate? EPA would like to see a plan of action and a commitment by NPS to ensure visitor safety. (U.S. Environmental Protection Agency, rocr2982.003)

**Response:** The National Park Service has a long history of safely opening and closing the park roads in association with the current weekend closures, and in changing direction on the Rock Creek and Potomac Parkway every workday morning and evening. The National Park Service agrees that safety is paramount, and commits to working with the U.S. Park Police to develop and implement an effective plan to ensure the safety of visitors.

The National Park Service would prepare an implementation plan that would include the types of measures for ensuring that vulnerable populations dependent on the hard surface were not stranded along the road upon its reopening. This could include performing a sweep of the road ahead of the first car after opening the gate.

## **Issue 2: Traffic Safety in the Park**

**Representative Comment 1:** How many accidents have there been on Beach Drive on weekdays between 9:30 am and 3:30 pm? How is visitor safety enhanced when there are virtually no accidents now? (rocr2792.002)

**Response:** Current traffic accident data (2001-2003) for Rock Creek Park and the Rock Creek and Potomac Parkway were obtained from the U.S. Park Police. These data include time of day and day of the week when each accident occurred. The data are summarized in the “Affected Environment” section of the final environmental impact statement and served as the basis for a revised impact analysis in the “Environmental Consequences” section.

**Representative Comment 2:** Facing a pack of 100 or more riders racing at a high speed (in excess of the posted speed limit) around a blind hairpin turn while you are having a pleasant walk is a far more dangerous and frightening experience than seeing a single car moving at the speed limit. (rocr0372.008)

**Response:** The National Park Service acknowledges that separation of pedestrians and bicyclists is a safety concern. Bicyclists must ride in a safe manner and conform with posted speed limits

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regardless of whether they are traveling on a roadway or sidewalk. Speed enforcement for bicyclists poses the same challenges as enforcing speed limits on automobiles.

The traffic calming measures that are included in the action alternatives should be equally effective for motorists and bicyclists. These devices could be installed on Beach Drive even under Alternative C if speeding bicyclists continued to be a problem. All of the action alternatives also would include two new staff positions for traffic enforcement. These officers would help ensure compliance of both bicyclists and motorists with speed limits and other traffic regulations.

### **Issue 3: Safe Access to Playgrounds**

**Representative Comment 1:** I am very troubled by the fact that it is UNSAFE for children to gain access to these facilities. In order to reach the playground it is necessary to walk through the parking lot in front of the tennis center, and then cross the street. That is bad enough as it is. However, things currently are far worse and far more dangerous. This is because the parking lot area has been closed to foot traffic due to the upcoming tennis matches. This means that parents or nannies bringing their children in strollers to this playground have to walk on the street to reach the playground.

I have seen cars speed along this access road in front of the playground, and I am amazed that Park Service has not previously rectified this problem. I am equally amazed that the Park Service allows the tennis matches to close off foot traffic to the parking area. Shouldn't the safety of our children be among our highest priorities? (rocr0809.002)

**Response:** The action alternatives would include two additional full-time staff positions for traffic enforcement. The playground area may be an appropriate location for reduced speed limits and traffic calming measures to maintain traffic at the speed limit even when officers are not around.

### **Issue 4: Effects on Traffic Accidents in Neighborhoods**

**Representative Comment 1:** The Draft GMP/EIS fails to provide adequate analysis of direct and indirect traffic impacts and related, foreseeable safety issues in the neighborhoods. It also fails to provide any mitigation plans for impacts on neighborhoods. (U.S. Representative Chris Van Hollen, rocr2994.009 and rocr2994.011)

**Representative Comment 2:** I believe that this is a very serious safety issue for the residents of this community. (U.S. Senator Barbara A. Mikulski, rocr2974.002)

**Representative Comment 3:** No analysis of potential accident, injury and fatality rates resulting from diverting traffic onto neighborhood streets. (rocr0755.007)

**Response:** The final environmental impact statement was revised to consider traffic accidents in the surrounding neighborhoods that would occur as a result of Beach Drive closures. This analysis was included for Alternatives C and D under the heading "Cumulative Impacts."

As described previously with regard to traffic, the National Park Service would work with communities to monitor neighborhoods of concern and coordinate with local groups to ensure that a

long-term increase in traffic accidents on residential streets near the park did not occur. If problems were documented, the National Park Service would coordinate with the community to develop effective solutions. These could include such measures as installing sidewalks in areas where they do not exist, providing better signage to route drives back to arterials and help them avoid entering the neighborhoods when Beach Drive is closed, and improving compliance with speed limits.

#### **Issue 5: Absence of Sidewalks in Neighboring Communities**

**Representative Comment 1:** None of our neighborhood streets have sidewalks. A significant traffic increase will further threaten pedestrian safety in our neighborhood. (rocr2999.003)

**Representative Comment 2:** Adding to this safety concern is the additional traffic and parking that will result from the forthcoming expansion of the Brookville Supermarket, and the fact that the portion of Brookville Road in the Village of Chevy Chase below Bradley Lane lacks any sidewalk whatsoever, a situation that boggles the mind in its stupidity. (rocr2795.003)

**Representative Comment 3:** Public Safety - According to traffic counts conducted by the Montgomery County Maryland and District of Columbia civil engineering teams, a closure of Beach Drive would divert approximately 200 vehicles per hour (between 9:30 am and 3:30 pm, Monday through Friday) into the neighborhoods surrounding Rock Creek Park. A primary route will be Daniel Road (Rollingwood), Oregon Avenue (DC) and Broad Branch Ave. (DC). The stated traffic counts on the noted residential streets would be unduly burdensome to children, families and elderly people who are not now provided sidewalks on the majority of those streets. NPS could have learned these things, but has failed to conduct a neighborhood impact study or cooperate with the stakeholder jurisdictions (Montgomery County and DC) to study and address this public safety threat. (rocr2838.002)

**Response:** Statements like these indicate that residents of surrounding communities currently are concerned about safety associated with the absence of sidewalks, regardless of the management of Rock Creek Park. As part of its policy of being a good neighbor, the National Park Service would lend its support to the efforts of these communities to convince their cities that sidewalks should be installed to enhance the safety of neighborhood residents and other pedestrians.

#### **Issue 6: Safety of Park Visitors, Especially Women**

**Safer with Traffic Representative Comment 1:** I also think there is a safety and security issue; limiting access during the week will make the park a more lonely spot, more likely to lead to potential dangers. As an avid walker myself, I would feel uncomfortable using the park roads and pathways during the week if broad access is cut off. During the weekend, there are so many people bicycling and walking on those roads that there is "safety in numbers" and no one would feel threatened. The numbers of bicyclists and walkers would be considerably smaller during the week. (rocr0354.004)

**Safer with Traffic Representative Comment 2:** I understand one of the considerations was pedestrian safety. If anything this new plan removes any hope of safety in the park. As a woman, I would never consider running/walking in Rock Creek parkway when there is no motor traffic. If

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someone was to approach me in Rock Creek, the first thing I would do is run out into the street and try and flag down a motorist to help me. A male colleague here at work who regularly runs in Rock Creek park during the week, says the same thing - he would try and flag down a vehicle for assistance. By completely removing the traffic, the chances of receiving any assistance is virtually eliminated. Therefore this plan would bar me from ever using Rock Creek whether by foot or by car. (rocr0842.001)

**Safer with Traffic Representative Comment 3:** I also wonder how my security will be increased if I must leave the security of my vehicle and enter the park alone. (rocr0908.002)

**Safer with Traffic Representative Comment 4:** You will actually deter some people from using the park. I have acquaintances who are already afraid to walk alone there during the day. This would become a very frightening place for some people, particularly older women. (rocr0934.002)

**Safer with Traffic Representative Comment 5:** Park safety is increased by promoting access. The “traffic” of all types has a benefit of limiting the opportunity for illegal activity. If you keep the law abiding good citizens of the nation out— others will find ways in for less wholesome purposes. As it is, most of us now walk carrying our cell phones, and I have used mine twice on walks to report illegal activity. (rocr2884.004)

**Safer without Traffic Representative Comment 1:** As a woman, I feel safer walking on the street as opposed to the trails. I hope that the street will remain closed to traffic during the day (at least). (rocr2748.000)

**Safer without Traffic Representative Comment 2:** Upper Beach Drive during the mid-day, mid-week closures would give me a big, wide open, safe place to run and walk with my fellow cyclists, baby joggers and others. On the weekends, it’s a really comfortable place to run. (rocr3047.003)

**Safer without Traffic Representative Comment 3:** This is a quote from a woman who was attacked in Rock Creek Park in the year 2001. She talks about the moment when she was attacked. She said “As soon as I felt him trying to get his arms around my neck, it was as if an internal switch flipped. I realized two things at once. First, that the loud traffic from Beach Drive across the creek was drowning out my screams.” I tell you what, if I’m running on one of those trails in Rock Creek Park and I yelled for help, there’s a lot better chance somebody is going to come and help me if there are people on foot and people on bikes on that road at that moment rather than just this steady stream of traffic. (rocr3047.004)

**Response:** The final general management plan and environmental impact statement was revised to include current information on crimes against persons (murder, rape, and assault) in the park vicinity and to evaluate the potential effects of the alternative on crimes against persons.

### Issue 7: Evacuation in the Event of an Emergency

**High Concern Representative Comment 1:** The Draft GMP/EIS [is inadequate because it] utterly fails to analyze emergency evacuation from D.C. or from the neighborhoods. (U.S. Representative Chris Van Hollen, rocr2994.008)

**High Concern Representative Comment 2:** The proposal, by prohibiting automobile access to the park, creates a public safety hazard in that it blocks access to emergency first responders and law enforcement agencies in addition to depriving residents of access to emergency evacuation routes at Rock Creek Parkway and George Washington Parkway. (rocr2855.004)

**High Concern Representative Comment 3:** The plan also pays no heed to the post-9/11 evacuation scenarios in the Washington area. Rock Creek is not a major evacuation route such as Connecticut Avenue or Wisconsin Avenue but it is the only reason my daughter and I reached home the morning of September 11th. Will USPP officers be available to unlock barrier gates in the event of an emergency to provide additional egress? (rocr1477.004)

**High Concern Representative Comment 4:** We are also deeply concerned in the post-9/11 environment about a plan to shut off a major alternative route. This will have enormously damaging consequences should residents of our neighborhood who work downtown be forced to leave the city as a result of a terrorist act or threat. (rocr2871.003)

**Low Concern Representative Comment 1:** I don't believe Beach Drive is on the list of official evacuation routes. There may be a reason why that's so. Perhaps it's because an accident along Beach Drive could cause a complete and catastrophic blockage of the road. In contrast, accidents along Connecticut and Wisconsin Avenues and 16th Street can be bypassed fairly easily. Even if Beach Drive would be used for mass evacuations, there is no reason why the road closures of Alternative D would present a special or insurmountable problem. The DC region is full of roads that change direction depending on time of day (15th Street NW, 17th Street NW, Rock Creek Parkway) or are closed to traffic with physical barriers at certain times of the day (HOV lanes on Interstate 395) and so on. These special arrangements have not been eliminated in the interest of homeland security, and I assume it's because they don't present a major impediment to the safety of DC residents who might one day need to evacuate downtown. (rocr2923.011)

**Low Concern Representative Comment 2:** Response to the argument that barriers along Beach Drive will interfere with fire and rescue: NPS can evaluate its long experience with the current metal gate system during weekend closures. My observations are these: Police, ambulance and fire equipment currently have complete access along Beach Drive during weekend closure hours. The metal gates can be circumnavigated, though this sometimes required a quick detour onto grass or a concrete median. I see emergency vehicles (especially Park Police) in these areas frequently. Various simple changes in closure devices (such as breakaway gates or gates with emergency release devices), different gate placement or transition to simple "No Entry" signs might allow better or more convenient access for emergency vehicles. Although these options would not provide barriers as secure as locked metal gates, NPS does use such modest traffic barriers elsewhere in Rock Creek Park. (rocr2923.010)

**Response:** The ability to currently use Beach Drive for emergency response and the effects of each alternative on this ability and on the evacuation of the city during a major emergency were added to the final general management plan and environmental impact statement.

## **Issue 8: Health Benefits Resulting from Exercise**

**Representative Comment 1:** Exercise! Many of us get enough of it, but from what I read, a lack of enough exercise is a major problem for a substantial percentage of Americans. Opening up

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Beach Drive for six hours a day on weekdays to non-automobile pursuits such as walking and bicycling couldn't help but promote more exercise which many Americans need. (rocr2895.001)

**Representative Comment 2:** Children are being deprived of an opportunity for exercise in their daily life by this unrelenting heavy traffic, which bears no small share of the responsibility for skyrocketing obesity and associated health problems among children. Asthma among children has also increased (and my 8-year old son is among these statistics), with increased air pollution from vehicles a major contributor. During the summer, when unhealthy air quality is virtually a constant, we are told to stay inside. Car-free zones on Beach Drive would provide a place where my son can ride his bicycle outdoors where he will not be subjected to health and safety hazards. (rocr1785.003)

**Representative Comment 3:** These HHS figures were compelling enough for President Bush to demonstrate the leadership to launch his Healthier US Initiative. Your draft plan for Rock Creek National Park is totally consistent with the Executive Order the President issued to implement his initiative. For there is a growing consensus that communities designed primarily for automobile use deny families safe places for walking, bicycling and other forms of daily physical activity that are essential to a healthy lifestyle. Your draft plan directly addresses this need by providing a safe and healthy place for our family to bicycle. I commend you for your support of the President's initiative. (rocr0565.003)

**Response:** Comments were noted. Exercise relates directly to the numbers of visitors and the types of activities they are participating in, which were considered in the section "Traditional Park Character and Visitor Experience." Exercise was not evaluated separately as a health issue in the general management plan and environmental impact statement.

## CONSULTATION AND COORDINATION, REFERENCES, AND APPENDICES

### CONSULTATION AND COORDINATION

Comments for this section should be considered along with the comments for the “Connected, Cumulative, and Similar Actions” section because the comments addressed similar topics.

#### **Issue 1: The National Park Service Did not Coordinate Sufficiently with Others, or Did not Acknowledge the Positions of Local Officials and Their Constituents**

**Representative Comment 1:** There is little discussion of neighborhood views in the decision making process after 1998. The report should include the views of the ANCs from Forest Hills, Tenleytown, North Cleveland Park, Colonial Village, Shepherd Park, and Crestwood, all of whom oppose further Beach Drive closures. It is noteworthy that those ANCs closest to the park, whose constituents in theory would benefit the most from Beach Drive closure because of its geographic proximity are those ANCs opposed to further Beach Drive closure. In addition, the views of Council members Fenty and Patterson, whose wards include Rock Creek Park, also should be included. (rocr2935.008)

**Representative Comment 2:** Remarkably, the NPS somehow neglected to include the vast majority of those who use, or are affected by the use, of the park. Washington DC has very specifically defined and highly organized elected neighborhood commissions; in Maryland, the National Capital Park and Planning Commission is a governmental body; even the vast list of interested parties to whom the NPS distributed the draft. All of these should have been invited to the table to help craft an inclusive plan. Rather, the plan being presented pits the park's constituents against each other. (rocr0309.002)

**Representative Comment 3:** All of the local and regional governments remain opposed to any closing of Rock Creek Parkway. This opposition is not acknowledged nor are current conditions – not future fears – dealt with. (rocr1477.003)

**Representative Comment 4:** Issue: NPS has not involved other impacted government entities in its planning.

- The District of Columbia and Montgomery County Councils have passed formal resolutions emphasizing the importance of Beach drive and the Rock Creek and Potomac Parkway to the local and regional transportation system.



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- The Councils and the Maryland Department of Transportation, the District of Columbia Department of Public Works have urged NPS that the corridors have no new motor vehicle restrictions because of the potential adverse effects on the heavily burdened regional street grid. This position is supported by all of the above.
- Several neighborhood organizations, and many individuals commented during scoping that they oppose the alternatives for similar reasons. (NPS p. 62) (rocr2999.009)

**Representative Comment 5:** On page 62 of the draft plan the National Park Service recognized that it has to work with the D.C., Maryland and local governments and agencies to address issues relating to air and water quality. It is of grave concern that the National Park Service has failed to work with these governments and agencies when developing its traffic proposals. (rocr0764.011)

**Representative Comment 6:** Strong Political Opposition. Some critics have stated that you failed to adequately involve stakeholders affected by Beach Drive closure. Others state that you failed in your analysis of the proposed action. In my opinion, I unfortunately believe you have done both. Our elected officials are very sensitive to community concerns, and almost universally they agree with our findings concerning the inadequacies of your EIS. (rocr0822.007)

**Representative Comment 7:** The Superintendent never contacted our homeowner's organization or other homeowner's associations to discuss the impact to our public safety. (rocr1710.001)

**Response:** Please see the “Consultation and Coordination” section on pages 269 and 270 of the draft environmental impact statement. In addition to the outreach activities described there, the draft general management plan and environmental impact statement were part of the consultation process. Before and after the publication of the draft plan:

- The National Park Service sent out newsletters to keep the public and their representatives informed. Several of the newsletters invited public input, and responses resulted in the preliminary alternatives and subsequent changes to create the final alternatives. Please see “Public Input and the Development of Alternatives” starting on page 59 of the draft plan.
- The park superintendent and planners talked with numerous citizens organizations, resource management agencies, and governing bodies and considered their concerns and suggestions during preparation of the plan.
- People and their representatives were encouraged to consult via phone or in person, or to make their views known in letters and e-mails.
- The National Park Service advertised the availability of the general management plan and environmental impact statement in the *Washington Post*, *Washington Times*, and other local newspapers, and solicited citizen input.
- The National Park Service invited citizens, organizations, and representatives to public meetings where they could learn more about the plan and provide comments.

Because of these efforts, more than 800 people participated in public meetings and the National Park Service received more than 3,000 written and oral responses on the draft document.

The process of consultation and coordination for the general management plan will remain open until the record of decision is signed. After that, it will continue in the implementation of the approved plan.

## **Issue 2: Better Access to Information on the Internet**

**Representative Comment 1:** The notice in the *Federal Register* at Volume 68, Number 50, Page 12368 states that "the document will be posted on the National Park Service Planning site under: <http://www.nps.gov.rocr/>." When I initially went to that site in May 2003 to obtain the draft plan, that page clearly identified the draft plan and by clicking on the name of the plan would bring up the plan. Since May the D.C. County Council and many other constituents have come out against the draft plan. At the same time the National Park Service has changed its site. The draft plan is no longer at the site listed in the Federal Register. Instead you have to hit "in DEPTH" and then search for the draft plan. On the other website, <http://planning.nps.gov/plans.cfm> you have to search for Rock Creek Park Draft Management Plan on a long menu of management plans. I can only assume that the National Park Service made these changes because it did not like the general negative reaction it was receiving from the significant number of groups that would be negatively impacted by the road closure proposals described in the draft plan. (rocr0764.000)

**Response:** The National Park Service regrets any inconvenience that may have occurred in finding the draft general management plan on the Internet. However, there was no intent to "hide" the document because of the potential for a negative response. The condition noted here was the result of an NPS servicewide web site revision, at least two of which have been implemented since the draft general management plan was released. It was coincidental that one occurred during the comment period.

Individual parks have no control over such NPS-wide reorganizations. Parks often are not aware of such changes until after they are implemented. As we identify resulting problems, we must then work with web specialists to reestablish the links that were inadvertently buried or severed.

All web links will be updated in the final general management plan and its *Federal Register* announcement. However, the Internet is a dynamic tool and the situation you described may happen again. If it does, we would appreciate you notifying the park superintendent's office by telephone and making us aware of the problem so we can implement appropriate corrective actions.

## **APPENDICES**

### **Issue 1: Traffic Modeling Methodology or Results Were Inadequate**

**Representative Comment 1:** The EIS contains no real independent traffic studies. It simply relied on an adapted version of the model employed by the Council of Governments. The COG model is not suited to assess traffic impacts at the local and neighborhood level required by the preferred alternative. Furthermore, the COG model uses outdated traffic counts from the early 1990's. I urge you to give careful consideration to expert testimony presented by traffic engineers on this subject. If left uncorrected, it appears the egregious failure to conduct thorough independent traffic studies presents a significant legal exposure for the Park Service. (rocr0822.003)

**Representative Comment 2:** The NPS has made no effort when preparing the draft plan to determine the traffic impacts that closing Beach Drive would have on the surrounding communities. It's clearly stated in Appendix H (p. 346) that "it was not practical to model local roadways." NPS attempted to apply the MWCOG regional traffic model to local conditions. The proposed northern-most point of closure to Beach Drive is over one mile south of its intersection with East-West Highway. By simply placing traffic counters in the southbound lane of Beach Drive/Jones Bridge and at the entrance to the four neighborhood streets that precede the proposed closure to measure the differences between weekend and weekday traffic volumes, your traffic engineers could have extrapolated the impact of the cut-through traffic. At the very least, the extrapolation would have illustrated the need to sub-divide the traffic analysis zones to better capture the likely trip distribution. For the engineering firm of Robert Peccia & Associates to state that the MWCOG traffic model was "valid for the analyzing the GMP alternatives" suggests either ignorance or gross negligence to the point of malpractice. (rocr2945.006 and rocr0309.008)

**Representative Comment 3:** The GMP states that "nearby street intersections would be operating well below their capacities during the mid-day period.... While the diverted the mid-day traffic would be perceptible on some city streets, it would not cause any changes in levels of service or in traffic-related community character." At the same time it says that there would be a 20% reduction in traffic along Beach Drive between Joyce Road and Broad Branch Road. That 20% of traffic has to go somewhere. The logical places for it to go are first, along Broad Branch Road, and second through Forest Hills to Connecticut Avenue. Both of these problems have received insufficient consideration under the GMP, which is based on a long-outdated traffic study (1990). The model to which that data is then applied "has [not] been developed and validated . . . [for] corridor studies such as the Rock Creek Park project." (rocr0372.003)

**Representative Comment 4:**

- Insufficient modeling of cut-through traffic in local neighborhoods.
- The plan includes no data on projected impacts to residential roads in Maryland.
- Those of us who live near the park witness a surge in cut-through traffic on weekends when Beach Drive is already closed to vehicles. Approximately 420 vehicles currently enter Beach Drive every hour during the workday. Despite weekend patterns, NPS assumes that most diverted workday traffic will choose congested corridors such as Connecticut Avenue and 16th Street.
- What little modeling is included in the plan relies on old data from 1990, and the model employed is designed for evaluating only regional issues, not corridor or neighborhood impacts. (rocr3000.002)

**Response:** No changes were made in the modeling because of comments. The Metropolitan Washington Council of Governments is the agency in the Washington, D.C. area that is responsible for regional planning and traffic modeling. Its transportation model, which was used for the analysis of the Rock Creek Park alternatives, is well suited for assessing traffic impacts at the local and neighborhood level. This model was designed to evaluate impacts on road segments as small as a single block and is routinely used for this purpose by the Metropolitan Washington

Council of Governments and others. The effects on more than 80 road segments in and around Rock Creek Park were modeled to determine effects on neighborhoods and corridors. The results were included in Appendix G of the draft environmental impact statement.

The multiple traffic analyses that were performed in association with preparing this general management plan each used the most recently available traffic data at that time. As described in Appendix H, the traffic analysis originally was performed in 1996 using data from 1990. It was run again in 2002 using the then-most-current traffic counts from the Washington D.C. Department of Public Works, which dated from 1999. These were the results that were used in the draft environmental impact statement.

The National Park Service conducted another round of traffic counts in June 2004. It also obtained the most recent traffic counts available from the District of Columbia, Department of Transportation (2001) and the Maryland-National Capital Park and Planning Commission (2003). The analyses in the final environmental impact statement were based on these data.

## **Issue 2: Add to Laws and Executive Orders**

**Comment 1:** In Appendix B, Laws and Executive Orders, Other Laws, Under Natural Resources, include the “District of Columbia Water Pollution Control Act, D.C. Law 5-188; D.C. Official Code §§ 8-103. (rocr1736.011)

**Response:** This change was made in the final document.

## **OTHER NEPA CONCERNS**

### **Issue 1: Document Provides Adequate NEPA Compliance**

**Comment 1 from the U.S. Environmental Protection Agency:** In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft General Management Plan/Environmental Impact Statement (Draft GMP/EIS). EPA has assigned this Draft Environmental Impact Statement (DEIS) a rating of LO-1 (Lack of Objections - Adequate which indicates that we have no objections to the proposal and that the DEIS adequately addressed the environmental impacts of the preferred alternative. (rocr2982.001)

**Response:** Comment noted.

### **Issue 2: Document Provides Inadequate NEPA Compliance**

**Representative Comment 1:** Do you know they violated NEPA by not performing a detailed statement when undertaking a major federal action that significantly impacts the quality of the human environment. The NPS did not perform one impact study on our neighborhood to determine if our public safety would be jeopardized by their plan. We feel this was done deliberately because they knew the results. I had the Maryland National Capital Park and Planning Commis-

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sion perform the studies on our street and they found a significant cut through problem with the preferred alternative plan of the NPS. (rocr1710.002)

**Response:** The referenced traffic counts from the Maryland-National Capital Park and Planning Commission were not collected until the summer of 2003, after the draft plan and environmental impact statement had been released for public comment. As a result of public concerns, a supplemental traffic study was performed by the National Park Service in June 2004 to address the effects of Beach Drive management approaches on surrounding roads, including those in neighborhoods. The results from the National Park Service traffic study and the Maryland-National Capital Park and Planning Commission traffic counts were used in the final environmental impact statement to determine effects that would occur outside the park.

**Representative Comment 2:** I find that in fact you have failed in your obligations under NEPA to adequately evaluate the impacts in the local communities, particularly the traffic concerns. (rocr3095.002)

**Response:** An expanded analysis of impacts on traffic outside the park has been included in the final environmental impact statement.

**Representative Comment 3:** Relying on outdated studies and statistics, the recommendations lack currency and may have led to faulty projections and, consequently, inappropriate recommendations. (rocr3030.003)

**Response:** Although some of the supporting studies may have been conducted several years ago, their relevance to current conditions were confirmed before using them to evaluate alternatives. Data throughout the document were updated during preparation of the final general management plan and environmental impact statement.

**Representative Comment 4:** I find the draft management plan inadequate because it does not recognize, much less discuss it in any length, the importance of Rock Creek Park to migratory birds. The reference to migrants appears only in a very brief summary of birds in the park. It is extremely surprising, in fact rather dismaying since during the 1999 cell phone controversies, literally inches of testimony were delivered to the National Park Service on the importance of Rock Creek as a migratory corridor through the increasing urbanized D.C. area. (rocr3105.001)

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

- Adding birding to the list of appropriate activities in 6 of the 12 management prescriptions that comprise the alternatives. These included the Administration/Operations Zone where vegetation management for other purposes inadvertently created high-value bird habitat. See table 2 and the associated text in the final general management plan.
- Modifying all of the action alternatives to include a commitment enhance the management of park habitats for birds, and identifying of some of the actions that could be taken to achieve this goal.

- Providing the locations of some of the park's important bird habitat areas in the "Affected Environment" section and adding a commitment in this section to ensure their conservation and enhancement, regardless of the alternative selected in the final general management plan.

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

**Representative Comment 5:** Analyses described within this draft dismiss any effects on natural resources as insignificant without giving any references or demonstrating that any research was conducted. If there are no significant impacts, research supporting that needs to be documented. If there is no documentation, then projected effects should be identified as speculative; if they are based on professional judgment, that should be clearly stated and the professionals must be cited. (rocr2980.003)

**Response:** Research conducted to support the general management plan and environmental impact statement is identified in the "Bibliography," which began on page 287 of the draft plan. The list of preparers (authors and other professionals) was provided on pages 271 and 272. Both of these were updated in the final general management plan and environmental impact statement.

**Representative Comment 6:** Presented to serve as both a Management Plan and an Environment Impact Statement, the hybrid document ends up doing neither well. (rocr3030.002)

**Response:** The draft general management plan and environmental impact statement conform with all of the format and content requirements of *Director's Order #2, Park Planning* (NPS 1998a), its implementing sourcebook (NPS 1999b), and *Director's Order #12 and Handbook: Conservation Planning, Environmental Impact Analysis, and Decision Making* (NPS 2001a). The National Environmental Policy Act (NEPA) encourages combining these types of documents, and the National Park Service has been using this approach successfully for more than 20 years.

### Issue 3: Inappropriate Setting of Priorities

**Representative Comment 1:** There are many omissions in the Draft Management Plan Alternatives, but the controversy over weekday closing of part of Beach Drive has kept them from public notice. The present Alternatives put little priority on maintaining the natural resources of the Park — animals, birds, plants, water, ecology. (rocr3027.001)

**Response:** Goals and approaches for managing these resources in Rock Creek Park and the Rock Creek and Potomac Parkway are described on pages 15 through 28 of the draft general management plan. Because most aspects of their management would be the same for all alternatives, including the alternative to continue current management (Alternative B), there was no need to examine these aspects further in the environmental impact statement.

**Representative Comment 2:** The GMP is unbalanced in its analysis and corresponding recommendations for management of an urban park and all its resources. Rock Creek Park has much more to offer than a scenic commute by car or bike. The plan gives short shrift to other users and

the other management opportunities and challenges that will shape the future use and health of the park. (rocr3030.001)

**Response:** Comment noted.

**Representative Comment 3:** And, especially critical, given limited federal funding resources, the plan does not provide sufficient guidance on how the National Park Service will set its priorities for protecting and managing the park in the future. (rocr3030.005)

**Response:** The general management plan provides broad-based guidance on management. More detailed implementation, strategic, and annual plans will include the level of information needed for setting priorities for protecting and managing Rock Creek Park.

#### **Issue 4: Inadequate Consideration of Costs**

**Representative Comment 1:** Another deficiency is no cost benefit analysis undertaken by NPS. No cost benefit analysis was performed by the NPS of adverse impacts on neighborhoods surrounding the park which are an increased rate of pollution, increased gas use by diverted vehicles, need for the community to put traffic calming measures. (rocr3040.008)

**Response:** The analyses of air quality and traffic in the draft and final environmental impact statements found that effects on regional air quality and traffic (with associated use of gasoline) would be negligible. Therefore, changes in costs would be negligible. While the incremental change in traffic outside the park because of some management actions on Beach Drive could cause some communities to consider traffic calming measures, no such actions have actually been proposed. Based on these considerations, there was no reasonable basis on which an analysis of costs versus benefits could be prepared.

The National Park Service does not prepare typical cost versus benefit evaluations for management actions because they deal more with quality of life issues than absolute costs. The purposes of national parks, including Rock Creek Park, include protection of resources and visitor enjoyment. These factors are not amenable to cost versus benefit analyses.

**Representative Comment 2:** I suspect that the cost estimates for any changes are too low. Any new construction would have to be in substantial conformity with the latest official design criteria. 23 CFR 652.7(5). These historic roads, which predate the environmental laws, can be preserved to their historic proportions, but if you try to widen them, then you will incur additional cost. Plus, the network is set. It may take an act of Congress to change the roads in Rock Creek Park. (rocr2769.020)

**Response:** Comment noted.

**Representative Comment 3:** Financial issues: Because the report depends on data that is several years old, and project information that is preliminary at best, we believe that the financial projections for both capital and operating expenses are insufficient to meet the needs of the park. We recommend that the final GMP should include:

- a) Sufficient resources. Justification for funding at levels sufficient to provide sufficient staffing and other resources to fully support the planning and management of the park and its programs;
- b) Deferred maintenance. Disclosure of all deferred maintenance requirements (and annual funding for deferred maintenance) over the 20 years of the GMP planning horizon; and
- c) FY2004 \$. Update financial data in the report with fiscal year 2004 dollars (instead of 2001). (rocr3030.013)

**Response:** The general management plan considers life-cycle costs for new facilities, but the costs of maintaining existing facilities typically are not considered in the selection of alternatives. The level of detail that was included in the document supports the general management plan process.

Annual maintenance is not a general management plan issue. A general management plan is intended to address items that are not in the yearly budgets.

Cost estimates in the final environmental impact statement were updated to 2004.

#### **Issue 5: Need for NEPA Analyses on Individual Actions**

**Representative Comment 1 from the U.S. Environmental Protection Agency:** EPA understands that the NPS will prepare project-specific environmental analysis prior to implementation of any of the actions included in the Draft GMP/EIS. EPA makes specific reference to the proposed physical relocation of administrative functions from historic structures to a consolidated central office. It is not determined whether relocation of the park's administrative offices would be moved to commercial space inside or outside of the park. Thus, the impacts associated with this proposal have yet to be analyzed. (rocr2982.002)

**Response:** For projects inside the park, the National Park Service is planning to perform further environmental analyses, probably including a National Environmental Policy Act (NEPA) environmental assessment, before such actions would be implemented. Elements that could occur outside the park (leasing administrative office space and space for the U.S. Park Police) would require commercial-type space, which we expect would be available and would result in negligible impacts.

**Representative Comment 2:** I would seriously question the wisdom of expanding facilities at the Maintenance Yard for administration and at the H-3 area for police. I presume the public will have an opportunity to comment on more specific plans if the Park Service decides in the future to move in that direction. (rocr0317.003)

**Response:** The final environmental impact statement was revised to clarify that the park maintenance yard and H-3 area were just candidate sites. It also made clear that new in-park facilities would be constructed only if suitable commercial space could not be found outside the park and after a siting study that emphasized environmental concerns that determined the best in-park loca-



tions for the facilities. This would include preparation of National Environmental Policy Act documentation with opportunities for agency and public review and comment.

#### **Issue 6: Need Unbiased Decision-Making**

**Representative Comment 1:** I was astounded to read recent newspaper reports quoting Superintendent Adrienne Coleman's defense of her proposed week day closure of Beach Drive as being based on her own personal preferences for use of Rock Creek Park ("It's hikers. It's people like me who walk in the park"). It is black letter law that a federal government administrator must never let her/his personal uses or preferences affect the ways in which she/he manages the Nation's resources. (rocr1481.001)

**Response:** It is unclear how the referenced quote would indicate a preference for any of the alternatives.

Alternative D, which would involve mid-day closures of Beach Drive during the week, was developed based on a request from the Mayor of the District of Columbia. Please see page 95 and appendix D of the draft general management plan and environmental impact statement. A team of approximately 20 NPS representatives from the park, region, and national levels met to develop this alternative based on the Mayor's request.

The general management plan was not based on the preferences of any individual. The alternatives presented in the general management plan were developed through public scoping. Impact analyses were conducted by subject matter experts and other professionals.