



## **FINDING OF NO SIGNIFICANT IMPACT**

### **Rock Creek Park Nature Center Complex Development Concept Plan Washington, D.C.**

The National Park Service (NPS) prepared a development concept plan and environmental assessment (plan/EA) for Rock Creek Park to establish a vision and clear guidance for the future management of the Nature Center area (Nature Center Complex) at Rock Creek Park in Washington, DC. For the purposes of this plan/EA, the project area is defined as the Nature Center and Planetarium; Horse Center Area; Maintenance Area; and the immediate surroundings, including picnic areas #13 and #14 and nearby trails.

The facilities within the Nature Center Complex currently do not meet the full needs of park visitors and staff. They require upgrades for code compliance purposes, including improvements for physical and programmatic accessibility, fire suppression, and electrical and mechanical system upgrades. The current configuration of the Nature Center, a contributing resource to the Rock Creek Park National Register Historic District, does not make optimal use of its existing square footage, which limits its use for community gatherings and potential revenue generation.

The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 United States Code [USC] 4321 et seq.) and its implementing regulations (40 Code of Federal Regulations [CFR] 1500-1508.9); the Department of the Interior NEPA regulations (43 CFR Part 46); and with NPS Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision-making* (2011) and its accompanying handbook (2015). The statements and conclusion reached in this finding of no significant impact (FONSI) are based on the documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.

## **SELECTED ALTERNATIVE**

The EA analyzed a no-action alternative (alternative 1) and two action alternatives (alternatives 2 and 3) for proposed renovations to the Nature Center Complex, with a focus on actions associated with the Nature Center, Horse Center, Maintenance Yard, and surrounding amenities.

### **Selected Alternative Description**

Based on the analysis presented in the EA, the NPS has selected Alternative 3 as the selected alternative for implementation. Under the selected alternative (see pages 15-19 of the EA), the Nature Center Complex will see some upgrades intended to enhance visitor opportunities at the Nature Center, Horse Center, and surrounding area. In addition, areas that support park operations, such as the Maintenance Area, will be reorganized and expanded for improved efficiency and functionality. Buildings will be reconfigured, repaired, and/or repurposed to improve functional use and upgrade visitor and staff accommodations. Universal accessibility and safety improvements in the Nature Center Complex will be completed, and deferred maintenance will be addressed. The Nature Center Complex will use and showcase sustainable green solutions and technology, minimize damaging impacts to the environment, and strive for net zero emissions. Informational signs, new paths, and new connecting trails will also help facilitate pedestrian connections between facilities. Lastly, in this alternative, the Miller Cabin will be relocated into the area.

For this alternative, the maximum new development could include up to the following:

- 21,600 square feet of new or expanded buildings at the Nature Center, Maintenance Area, and picnic areas #13 and #14;
- 6,000 linear feet of new sidewalks;
- 5,100 square feet of new courtyard at the Maintenance Area;
- 10,000 square feet of new horse turnout space;
- 27,000 square feet of pavement in the Maintenance Yard; and
- 40,000 square feet or more of native habitat restoration at the US Capitol Stones area behind the Maintenance Yard.

Current parking lots will remain the same size.

All required stormwater management treatments will be pursued in accordance with the District of Columbia 2013 Stormwater Management regulations and guidelines. Please refer to pages 16-19 of the EA for detailed description of each specific action.

## **Rationale for Decision**

The NPS selected the preferred alternative for implementation because it best improves the visitor experience. It also allows for the necessary expansion of park maintenance facilities, while minimizing to the greatest extent possible the impacts on park natural and historic resources.

## **Mitigation Measures**

The selected alternative incorporates the mitigation measures listed in Appendix A of this document.

## **Finding of No Significant Impact**

As documented in the EA, the selected alternative has the potential for adverse impacts on historic structures and districts, wildlife and wildlife habitat, and visitor use and experience; however, no significant adverse impacts were identified. The following summarizes those impacts of the selected alternative. Please see pages 21-38 of the EA for a detailed impact analysis of those affected resources. A non-impairment determination is included as Appendix B.

The selected action will add additions to the north, northeast, and southern elevations of the Nature Center, and may have the potential to adversely affect the historic character and character-defining features of the building. However, every effort will be made to minimize the effects by using sensitive design and strictly adhering to the *Secretary of the Interior's Standards for the Treatment of Historic Structures*. Overall, the historic character and integrity of the Rock Creek Park Nature Center and the Horse Center will be maintained, as will each structure's role as a contributing structure to the Rock Creek Park Historic District. Renovations inside the structures will impact the historic fabric but will be minimized to the extent possible through mitigation measures and sensitive design, and major character-defining features will not be affected. All actions related to construction will require temporary visual disruptions within the area of potential effect because of the presence of construction equipment and materials. However, these impacts will only last for the duration of construction and will result in no permanent adverse effects on the historic structures. Implementation of alternative 3 will contribute the majority of the adverse cumulative impact on the historic structures and historic district within the area of potential effect and will contribute only slightly to the overall adverse cumulative effect to the viewshed within the district. Relocating the historic Miller Cabin out of the floodplain will have a beneficial impact on the Rock Creek Historic District but could require ground disturbance, which could impact archaeological resources. Further consultation with the District of Columbia (DC) state historic preservation office (SHPO) and other interested parties will ensure that any potential adverse effects are avoided, minimized or mitigated.

In terms of wildlife and wildlife habitat, implementation of the selected alternative will have local adverse impacts because of the removal of up to 13 trees and from the potential for increased noise and other human disturbances from increased visitor use. There will also be short-term adverse impacts associated with noise and activity during construction. It is expected that displaced species will return to restored areas following construction activities.

Construction of paths through areas that are currently undisturbed natural wildlife habitat will result in the disturbance of those habitats. However, the impacts will be minor because of the relatively small area being affected compared to the Nature Center Complex as a whole. Long-term beneficial impacts may result from the additional and improved education and interpretation elements that may increase the public's appreciation for wildlife and wildlife habitat. Ongoing urbanization of the Rock Creek watershed and other areas of Maryland and Virginia near Washington, DC, will continue to result in loss and fragmentation of wildlife habitat. The selected alternative will have little effect on regional, development-related impacts on wildlife and wildlife habitat.


Minor changes to the wooded character of the area immediately surrounding the Nature Center will impact those visitors who are currently familiar with the area. However, as time progresses and vegetation fills in these areas, those impacts will lessen. In all, however, the Plan/EA will establish a small network of paved and unpaved paths to connect pedestrians with site facilities, improve universal access, update picnic facilities, improve wayfinding, and increase programming, resulting in a long-term, beneficial impact on visitor use and experience.

## CONCLUSION

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2) (c) of NEPA.

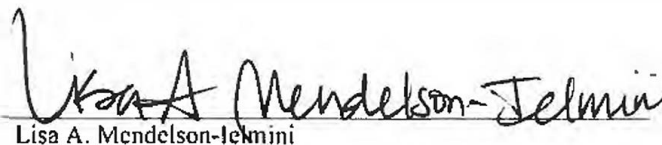
Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

Recommended:

  
Julia Washburn  
Superintendent  
Rock Creek Park  
National Capital Region

5/23/19  
Date

Approved:

  
Lisa A. Mendelson-Jelmini  
Acting Regional Director  
National Capital Region

5/29/2019  
Date

- Appendix A Mitigation Measures
- Appendix B Non-Impairment Determination
- Appendix C Section 106 Correspondence
- Appendix D Response to Public Comments
- Appendix E Errata

## APPENDIX A: MITIGATION MEASURES

To minimize impacts related to the selected alternative, the NPS will implement mitigation measures whenever feasible. Subject to the final design and approval of plans by relevant agencies, mitigation measures will include, but will not be limited to, the items listed below.

- The project design would follow the requirements of the District of Columbia 2013 Stormwater Management Rule, which requires on-site stormwater runoff reduction and maximum stormwater retention.
- To minimize potential impacts on northern long-eared bat habitat, removal of trees greater than 3 inches in diameter at breast height (DBH) will be prohibited during maternity season from June 1 to July 31. In addition, no trees will be removed within 150 feet of any known roost or maternity trees or within 1/2 mile of any known hibernacula during implementation.
- Care will be taken to avoid any rutting caused by vehicles or equipment.
- Soil erosion best management practices will be used (e.g., sediment traps, erosion check screen filters, silt fences) to prevent the entry of sediment into waterways.
- Where seeding is required, a weed-free native plant seed mix will be obtained and used in accordance with NPS policies and guidance. Management techniques will be implemented to foster rapid development of native plant growth.
- Visitors will be informed of construction activities by posting information at the Nature Center, Horse Center, bulletin boards and the Park's website. Visitors will also be routed away from work areas during construction.
- All protection measures will be clearly stated in the construction specifications.
- All mitigation for historic districts will be completed in consultation with the SHPO; this consultation will continue into the design phase of the project. Impacts on historic structures or districts will be minimized by ensuring that improvements are conducted in a manner consistent with the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. Moving of the Miller Cabin will require consultation with the SHPO prior to relocating.
- Rock Creek Park has identified archeological resources as one of its other important resources and values. Any known archeological sites will be avoided. If there is the potential for archeological resources to exist in an area, a phase 1A survey would be conducted, followed up by the appropriate level of survey work to ensure the protection of the resource.
- If archeological resources are unintentionally discovered during construction, all work in the immediate vicinity of the discovery will be halted until the resources can be identified and documented and an appropriate mitigation strategy can be developed. Consultation with NPS, and/or the NPS regional archeologist and the SHPO will be coordinated to ensure that the protection of the resources is addressed. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (25 United States Code 3001) of 1990 will be followed.

## APPENDIX B: NON-IMPAIRMENT DETERMINATION

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the US Department of Interior and the NPS to manage units “to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (54 USC 100101). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that NPS must conduct its actions in a manner that will ensure no “derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress” (54 USC 100101).

*NPS Management Policies 2006*, Section 1.4 explains the prohibition on impairment of park resources and values. While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

This determination on impairment has been prepared for the selected alternative described in this Finding of No Significant Impact. An impairment determination is made for the resource topics of historic structures and wildlife and wildlife habitat. These resources are considered fundamental to Rock Creek Park. An impairment determination is not made for visitor use and experience because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act and cannot be impaired in the same way that an action can impair park resources and values.

**Historic Structures and Districts** - Although the selected alternative will change the design and form of the Nature Center by modifying the exterior envelope of the structure and configuration of the interior, the selected alternative will not result in impairment of the historic structure. The additions, reconstruction and repairs will be made in accordance with *Secretary of the Interior's Standards for the Treatment of Historic Structures* for restoration and reconstruction, and in coordination with the DC SHPO. Overall, the historic character and integrity of the Rock Creek Park Nature Center and the Horse Center will be maintained, as will each structure's role as a contributing structure to the Rock Creek Park Historic District.

**Wildlife and Wildlife Habitat** - Impacts to wildlife will be limited to construction-related temporary impacts including a slight loss of habitat and noise generation, and will be mitigated through the use of best management practices, such as construction timing restrictions. Vegetation clearing will also have the potential to disrupt wildlife. There is the potential for slight long-term impacts to wildlife as a result of introducing more people to areas that are not currently heavily used. Since these impacts will be limited, there would be no impairment to wildlife as a result of implementing the selected alternative.

### SUMMARY

The NPS has determined that the implementation of the NPS selected alternative will not constitute an impairment of the resources or values of Rock Creek Park. As described above, implementing the selected alternative is not anticipated to impair resources or values that are essential to the purposes identified in the establishing legislation of the park, key to the natural or cultural integrity of the park, or identified as significant in the park's relevant planning documents. This conclusion is based on consideration of the park's purpose and significance, a thorough analysis of the environmental impacts described in the EA, the comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction of the *NPS Management Policies 2006*.

## **APPENDIX C: SECTION 106 CORRESPONDENCE**

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
STATE HISTORIC PRESERVATION OFFICER



May 14, 2019

Mr. Nick Bartolomeo  
Chief of Resource Management  
National Park Service, Rock Creek Park  
3545 Williamsburg Lane, NW  
Washington, DC 20008

RE: *Rock Creek Park Nature Center Complex Development Concept Plan Section 106 Assessment of Effects Report*

Dear Mr. Bartolomeo:

Thank you for providing the District of Columbia State Historic Preservation Officer (SHPO) with a copy of the above-referenced report. We have reviewed the document and are writing to provide additional comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act.

Our records indicate that we provided comments on the proposed concept plan in a letter dated January 13, 2017, and in a meeting held on February 16, 2017. One of the primary concerns expressed by our office and the consulting parties at that time was that too much alteration was being proposed. We are pleased that the NPS responded by eliminating the two alternatives that proposed the most change. The three remaining options include "no action" (Alternative 1), an option involving "modest upgrades" (Alternative 2), and an option proposing "significant upgrades" (Alternative 3). The latter has been identified as the Preferred Alternative.

The Assessment of Effects Report indicates that Alternatives 1 and 2 would result in an adverse effect on historic properties, specifically the historic Miller Cabin, since neither option proposes to relocate the building from its present location where it is likely to be damaged by flooding. Since the current location is in a floodplain, this appears to be a reasonable conclusion. The act of relocating the building would not cause an adverse effect since the cabin has already been moved from its original site. The Preferred Alternative proposes to relocate the cabin to a location near Picnic Area #14 where flooding is less likely, thus resulting in no adverse effect.

Even though the Preferred Alternative proposes "significant upgrades...to the Nature Center, Horse Center, and surrounding area... [in addition to]... areas that support park operations such as the Maintenance Area," the report proposes a "Conditional No Adverse Effect" finding based largely upon application of the *Secretary of the Interior's Standards*. Use of the *Standards* can certainly reduce the potential for adverse effects but we are unable to concur with the proposed determination of effect because the alterations are too numerous and too significant to provide us with a reasonable level of certainty that "adverse effects" can be completely avoided, even with the application of the *Standards*.

For example, page 20 of the report indicates that the Preferred Alternative would "... include the removal of exterior historic materials associated with the Nature Center because of the expansion of the planetarium and development of interpretive staff offices." According to 36 CFR 800.5(a)(2)(i), "physical destruction of or damage to all or part of the property" would constitute an adverse effect.

Similarly, "adverse effects" might result from interior renovations to the Nature Center; the expansion of the Planetarium; the leveling of the auditorium floor; the addition of approximately 6,700 square feet to three sides of the Nature Center; the construction of a new, two-story office building in the Maintenance Area; and/or the cumulative effect of these and other proposed actions.



Moreover, the report does not evaluate the potential for adverse effects on known or undiscovered archaeological sites within the Area of Potential Effect (APE). This is of particular concern since some portions of the APE have not yet been surveyed but have considerable potential to contain archaeological resources (see attached table). New construction and other ground-disturbing actions could adversely affect these historic properties.

We appreciate that the NPS has made a conscientious effort to identify and evaluate the potential for adverse effects at an early point in project planning. However, it is our position that the NPS does not necessarily need to make a formal determination of effect for the Nature Center Complex Development Concept Plan since, according to 36 CFR 800.1(c), an agency is not prohibited from "...conducting or authorizing nondestructive project planning activities before completing compliance with Section 106, provided that such actions do not restrict the subsequent consideration of alternatives to avoid, minimize or mitigate the undertaking's adverse effects on historic properties." We have not identified anything in the report that would necessarily restrict the subsequent consideration of such alternatives and we recognize that the work which will be carried out in the future will be affected by the availability of funds, or the lack thereof. For these reasons, we believe that Section 106 can and should be completed for each project on a case-by-case basis. We also believe that the NPS can reduce the potential for adverse effects by doing the following once consultation on individual projects is initiated:

1. Scheduling a site visit so that SHPO staff can become more familiar with the site and its resources;
2. Consulting early with our office to discuss proposed concepts for each individual project and identify specific actions that may meet the criteria of adverse effect;
3. Proactively conducting any additional identification and evaluation efforts that may be necessary for historic built environment resources (i.e. Determination of Eligibility Forms);
4. Limiting removal of existing fabric to non-character-defining materials as recommended on page 21 of the report; and
5. Avoiding known archaeological sites and consulting further with our office to develop appropriate strategies for survey of unevaluated areas.

Such actions cannot guarantee adverse effects will be completely avoided, but if unavoidable adverse effects are identified, we will work with the NPS to develop alternatives to appropriately minimize and/or mitigate them. In the meantime, please contact me at [andrew.lewis@dc.gov](mailto:andrew.lewis@dc.gov) or 202-442-8841 if you should have any questions or comments relating to the historic built environment. Questions and comments related to archaeology should be directed to Ruth Troccoli at [ruth.troccoli@dc.gov](mailto:ruth.troccoli@dc.gov) or 202-442-8836. Thank you for providing this additional opportunity to review and comment. We look forward to consulting further to complete Section 106 for each of the individual undertakings proposed in the Nature Center Complex Development Concept Plan.

Sincerely,



C. Andrew Lewis  
Senior Historic Preservation Officer  
DC State Historic Preservation Office

17-0125

Mr. Nick Bartolomeo

Rock Creek Park Nature Center Complex Development Concept Plan Section 106 Assessment of Effects Report

May 14, 2019

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OBJECTID	SiteID	Location	ReportNo	Reference	SiteName	Project	Site Type	NRHP	Period
2	51NW002	Rock Creek Park east of Nature Center building	301, 352	Louis Berger Group 2005, 2008	Nature Center Quarry	Rock Creek Park Survey	P	Eligible D	UID Prehistoric
103	51NW159	ROCR N of Military Rd, E of Oregon AveSE of Fort DeRussy	300-01 352	Louis Berger 2004, 2005, 2008	Fort DeRussy Dump	Rock Creek Park Survey	H	Eligible A & D	Civil War
109	51NW166	W of golf course, e. of Beach Drive, n of Miller Cabin	300, 352	Louis Berger Group 2004, 2008	Isolates, Golf Course	Rock Creek Park Survey	H	Ineligible	Historic
110	51NW167	S of Military Rd, W of Ross Drive, E of Nature Center	301, 352	Louis Berger Group 2005, 2008	Quarry East of Nature Center	Rock Creek Park Survey	P	Unevaluated	UID Prehistoric; lithic scatter
111	51NW168	W of Ross Dr, S of Military Rd, Inside of curve, bisected by		Louis Berger Group	Battery left of Rock Creek	Rock Creek Park Survey	H	Eligible A & D	Civil War
115	51NW172	N of Broad Branch Rd, E of Grant Road	301,352	Louis Berger Group	Broad Run Knoll	Rock Creek Park Survey	P	Not determined	UID Prehistoric, camp
123	51NW181	Reservation #339	302, 352	Louis Berger Group 2006, 2008	Dos Passos Bower Site	Rock Creek Park Survey	H	Unevaluated	Late 19-Early 20th c. residence
124	51NW182	Reservation #339	302,352	Louis Berger Group 2006, 2008	Nail Locus	Rock Creek Park Survey	H	Not evaluated	Historic
127	51NW198	Rock Creek Pk. nr. Insx. Glover Rd & Ross Dr. 19-C house	309	Berger 2006	Charles Dickson House	NPS Rock Creek Park Survey	H	Eligible D	19th century, domestic
138	51NW194	Res. #339	302, 352	Louis Berger Group 2006, 2008	Broad Branch Quarry	Rock Creek Park Survey	H	Unevaluated	19th century, quarry

**APPENDIX D: RESPONSE TO PUBLIC COMMENT**

Topic	Public Comment	DSC discuss with Park
<b>Miller Cabin</b>	The NPS should create interpretive signs surrounding the Miller Cabin that tell the story of the cabin for visitors.	The National Park Service will examine installing interpretive materials at the Miller Cabin during the design phase of the project.
<b>Nature Center</b>	Alternative 3 calls for the installation of a 3,000 square foot bus pick-up/drop-off area at the Nature Center. The corresponding relocation of the nearby fire hydrant and water fountain will necessitate connection to water lines, placing uncalculated numbers of trees at risk. New impervious surface area will contribute to stormwater runoff.	The bus drop-off has been removed from the preferred alternative.
	The proposed covered glass corridor at the Nature Center creates a barrier in the natural landscape that, even if constructed with bird safe glass, interrupts the flyway of local birds. It also obstructs the view of the surrounding landscape from the front of the Nature Center.	This issue will be carefully considered during the design process.
	The description of changes made to the Nature Center on page 13 of the Complex Development Plan includes mention of northwest building expansion. This expansion is not depicted in Figure 3.	This expansion was for a possible restroom on the exterior of the building. This restroom was removed from the alternatives during the EA development process. This language should have been removed from the EA.
	We urge NPS to consider building the planetarium space upwards if possible, as opposed to outwards. We recognize NPS has an obligation to maintain the historic massing of the Nature Center, as per Mission 66 design. However, we urge NPS to be as cautious as possible in the expansion design phase to protect as many trees and wildlife habitat as possible.	In order to renovate the planetarium into a modern facility and to make it accessible, outward expansion of the Nature Center is required. This expansion will preserve the historic west facade of the structure.
	If an addition to the nature center is built, it should be located on the back side of the building away from trees on the north and west sides to preserve them for future generations.	Most of the proposed additions are on the rear (east) and south sides of the building. The planetarium rehabilitation would require expansion to the north of the building. This issue will be carefully considered during the design process.
	[DDOE question] Under the same section, ("Nature Center" on page 13) bullet eight mentions repairing an existing patio. Will pervious materials be used for the repair?	Pervious paving materials will be used where possible. This issue will be carefully considered during the design process.
<b>Nature Center Trail</b>	The nature trail near the Nature Center should be restored and enhanced.	We will repair these trails and enhance where possible. This issue will be

		carefully considered during the design process.
	In the comments I entered in both of the previous comment periods, I noted that it would be desirable if the small pond in the center of the Nature Center paved loop trail could again be filled with water, and low bushes planted to the southwest of the pond. When I first started birding in Rock Creek Park, this small area was often filled with migrating warblers, who came to the pond to bath and drink and then sought cover in a brush pile behind the pond. Since this path is the most accessible to all users, it would be nice to restore that delightful microhabitat. With that in mind, I oppose putting a new paved path across the middle of this loop.	Separate from this project, plans are underway to reline the pond to make it possible to hold water again.
<b>Bus Drop-Off/Pick-Up Area</b>	A pickup/drop-off area for buses should be designed so as to avoid damaging or removing the other large oaks. One suggestion is to provide parking for school buses in parking spaces on the west side of the parking lot on weekdays, when they are less likely to be used.	The bus drop-off has been removed from the preferred alternative.
	Furthermore, we [Potomac Appalachian Trail Club] absolutely oppose the addition of new bus parking at the Nature Center. We have rarely seen the entire Nature Center lot full, even on the busiest of days, and see no reason to pave over more public land to spare park users a short walk to the facility of their choice.	The bus drop-off has been removed from the preferred alternative.
<b>Water-wise Garden</b>	Construction of an accessible entryway into the Nature Center will eliminate a large portion of the Water-wise garden on the southeast side of the Nature Center. Removal of this interpretive space eliminates a valuable tool in NPS's water quality education curriculum and abolishes a stormwater management system. NPS should replace the Water Wise garden with another rain garden in the vicinity of the Nature Center.	This issue will be carefully considered during the design process.
<b>Horse Center</b>	Figure 2 does not depict the cleared grassy slope and picnic area east of the Horse Center stables. This area is frequented by patrons of the Horse Center and improves the visitor experience by providing a shaded eating and resting spot. It should be visible in the "No Action" figure to allow readers to comprehensively understand changes made in Alternatives 2 and 3.	Identification of this space has been added to all Alternative figures. See errata attached to FONSI.
	Maintain the development footprint of new and renovated facilities associated with the Horse Center within the existing limits of forest clearing.	Any development footprint will be within the concessioner's current assigned area.
	Furthermore, the plans show - incorrectly - that Cross Trail #6 and White Horse Trail converge at a trail to the indoor riding ring. There is no such trail. A fence blocks off any access from these trails to the ring. The only trail to the indoor riding ring is one leading from the horse center driveway. A large sign shows that it is restricted to horses and riders. The restriction appears to be for the safety of horses and riders, as well as the general public. It should be respected. Pedestrians and horses using Cross	Trail alignments have adjusted in all the alternative figures. See errata attached to FONSI.

	Trail #6 and White Horse Trail do have access to the horse center driveway by means of a trail between the muck barn and small riding ring, as shown on the existing conditions map.	
	The Plan should include an explanation of the Park's operational objectives and limitations of the Horse Center to assess the priority, costs, and benefits of changes to its relative to other resource needs.	A cost benefit analysis of the Horse Center alternatives is beyond the scope of this plan. The objectives of this project are clearly stated in the Development Concept Plan/EA.
<b>Horse Turnouts/ Paddocks</b>	This is the only public stable in the nation's capital and should be a showcase for how to care for horses offering trail rides, lessons, therapy and special events all year long.	Comment noted. One of the goals of this plan is to enhance the visitor experience in the park.
	That said, as a member of barn staff at the Rock Creek Park Horse Center (RCPHC), I wanted to voice that we are not in favor of the paddocks area proposed as it does not suit our needs.	Exact placement of the paddocks will be carefully considered during the design phase, based on site conditions and topography.
	The turnouts as drawn in the concept plan show the turnouts located in areas that would require the elimination of several trees in what has been prime birding habitat, in an area where some of the more unusual species have been recorded. The possible turnout area indicated to the west of the stable also seems unsuitable because it is not flat. I hope that when further study is done, the topology of this area will preclude it from consideration for a turnout. Perhaps the existing turnouts on the west and south sides of the stable could be expanded to increase turnout area.	Alternative locations for the turnouts would involve additional impacts on trees and vegetation. Exact placement of the turnouts will be carefully considered during the design phase, based on site conditions and topography.
	The current figures show the new turnouts on a sloped area which is inappropriate for the intended use. The document should reflect a desired location for the turnouts where the terrain permits with minimum tree loss.	Alternative locations for the turnouts would involve additional impacts on trees and vegetation. Exact placement of the turnouts will be carefully considered during the design phase, based on site conditions and topography.
	Not only would the two new horse turnouts obliterate the picnic area and remove trees and shrubs, there is danger in building them on such a slope. My understanding is that turnouts should be level, not sloped, for the safety of horses.  It may be possible to build one horse turnout in this area, but it should be designed carefully for the horses' safety and to preserve trees and the picnic area. The dimensions of the turnout might have to be changed, and the paved vehicle pad for the muck barn reconfigured.	Exact placement of the turnouts will be carefully considered during the design phase, based on site conditions and topography.
	However, the two turnouts located opposite the entrance to the stables would require the elimination of 10 mature trees. The result is that a useful birding site would be eliminated and bird habitat would be seriously affected.	Exact placement of the turnouts will be carefully considered during the design phase, based on site conditions and topography.

	<p>I urge that the turnouts be moved from the current site to a different location.</p> <p>Construction of the northernmost turnout would result in the loss of 10 mature trees. These trees border a wetland whose trees have been subject to unstable slopes, indicated by the recent collapse of a large oak that damaged the roof of the indoor riding ring. Removal of trees in this area promotes further instability and diminishes the continuity of the tree canopy near the breeding bird census tract. Tree removal can be minimized by moving horse turnouts closer to the muck barn, thus also preserving the picnic area east of the stables.</p>	<p>Exact placement of the turnouts will be carefully considered during the design phase, based on site conditions and topography.</p>
<b>Maintenance Yard</b>	<p>I do not support expansion of the maintenance yard footprint 75 feet into the wooded area of the Capitol Stones. Nor do I support relocating the fueling station to the back of the yard. Both of these would have a serious impact on migrating birds and diminish the visitor experience.</p> <p>As Bruce M. Beehler explains on page 423 of his newly published <i>Birds of Maryland, Delaware, and the District of Columbia</i> (Johns Hopkins University Press, Baltimore: 2019):</p> <p>"Rock Creek Park . . . is the major migration route of birds through urban Washington and thus has become famous as a site to view warblers and other songbird migrants. The area of greatest interest to birders is the West Ridge, from Military Road south to Broad Branch Road, encompassing military field, the nature center, the maintenance yard, the horse center, and a number of adjacent picnic areas. . . . The most famous migrant songbird site is the clearing behind the maintenance yard, south of the horse center. . . . Experienced birders are present in this clearing most spring mornings. Expect various vireos, warblers, thrushes, and more."</p> <p>Expansion of the maintenance yard 75 feet into the Capitol Stones would destroy a large portion of the area favored by spring and fall migrants and greatly diminish bird sightings for birders. Birds seek the chestnut oaks, black cherry, box elder, black locust, red mulberry, elms and ash trees that would be felled for the expansion. These trees provide plentiful seeds, nuts, and fruits to nourish them on their long migration. Because they are "edge" trees with greater access to sunlight than those of the interior forest, they produce more fruits and attract more insects for the birds to eat. Consequently, this is a great place for birders to see the birds as they fly from tree to tree around the clearing. Extending the maintenance yard into this forest would reduce the food sources for birds and force them to seek nourishment elsewhere, thereby lessening opportunities for birders to see them.</p>	<p>Regarding the footprint, the southern expansion of the Maintenance Yard in the preferred alternative will now be limited to 35 feet, due to the presence of a potential cultural resource. The tree loss due to this reduced expansion will be minimal.</p> <p>Alternative locations of the above-ground storage tanks will be carefully considered.</p>

	<p>Limit the development footprint of the Maintenance Area to the area currently contained within the fence or shift the south boundary further northwest.</p>	<p>Regarding the footprint, the southern expansion of the Maintenance Yard in the preferred alternative will now be limited to 35 feet, due to the presence of a potential cultural resource. The tree loss due to this reduced expansion will be minimal.</p>
	<p>If the maintenance yard requires an additional 24,000 square feet of space for storage, another option may be expansion to the northeast border of the existing buildings instead of expanding to the southeast.</p>	<p>Expansion of the Maintenance Yard is necessary for proper management and maintenance of the park. The park is also attempting to consolidate all the maintenance operations within the boundary of the Maintenance Yard. This consolidation will reduce impacts from park operations on the surrounding area.</p>
	<p>Within the EA, the NPS states upwards of 24,000 square feet would be developed with permeable surfaces within the maintenance yard. NPCA urges the NPS to consider alternatives that would reduce the footprint of this expansion and explore options to mitigate any impacts that would occur as the NPS seeks to consolidate park operations into a more centralized location.</p>	<p>Regarding the footprint, the southern expansion of the Maintenance Yard in the preferred alternative will now be limited to 35 feet, due to the presence of a potential cultural resource. The tree loss due to this reduced expansion will be minimal.</p> <p>In addition, the consolidation of all the maintenance operations within the boundary of the maintenance yard will reduce impacts on the surrounding area. The addition of administrative staff to the Maintenance Yard will increase operational efficiency and reduce environmental impacts by reducing the need for staff to drive between different locations.</p>
	<p>I urge you to renovate and improve the maintenance yard within its existing fenced-in footprint. I believe this can be done through better configuration of the buildings, better use of storage space, and removal of unused and broken equipment that has been languishing for years.</p>	<p>Regarding the footprint, the southern expansion of the Maintenance Yard in the preferred alternative will now be limited to 35 feet, due to the presence of a potential cultural resource. The tree loss due to this reduced expansion will be minimal.</p> <p>In addition, the consolidation of all the maintenance operations within the boundary of the Maintenance Yard will reduce impacts on the surrounding area. The addition of administrative staff to the Maintenance Yard will increase operational efficiency and reduce environmental impacts by reducing the need for staff to drive between different locations.</p>

	Some things can and should be done much sooner. Removing the discarded/ trashed vehicles parked in the back would be one step. Removing the other trash in the back would be another. And designating the path along the side of the yard as a trail and providing appropriate improvements would be a third.	Comment noted. The park will consider actions, separate from this plan, to remove the surplus vehicles, equipment and supplies from the south end of the maintenance yard area, as well as improve the surface of the trail.
	The Park's General Management Plan (GMP) acknowledged that "the mixed areas of grass, shrubs and trees at the maintenance yard provide high-value wildlife habitat for migrating birds." (p.84) and committed to "develop[ing] measures to protect and enhance" this area through the natural resources management plan. (pp. 206-207) The GMP also provided assurance that if reorganization or improvement to the maintenance yard occurred, "the site would be reorganized and improved <b>WITHIN THE EXISTING DEVELOPED AREA.</b> " (p. 84, emphasis added) The area of the Capitol Stones, where the expansion would occur, is not a developed area.	The US Capitol Stones were brought into the park in the late 1950s-early 1960s. The area they occupy has been a working stone yard since this time.  The southern expansion of the Maintenance Yard in the preferred alternative will now be limited to 35 feet, due to the presence of a potential cultural resource. The tree loss due to this reduced expansion will be minimal.  In addition, the National Park Service is creating natural area as a result of this process.
	[DDOE question] On page 14, under "Maintenance Area," bullet four states that 22,000 square feet of permeable surface pavement will be added. What will this surface be used for? If it's merely for stockpile and/or storing vehicles, a permeable surface may not be very effective.	It is the intent of the National Park Service to maximize, to the greatest extent possible, stormwater management on the site. Permeable pavement is one stormwater management option being considered. We will work closely with DDOE during the design phase of the project to plan for appropriate stormwater management.
<b>Above Ground Storage Tank</b>	The GMP made assurances that "[b]est management practices would be implemented to reduce the risk of environmental contamination from operations." (p. 84) Locating a new fueling station at the rear of the maintenance yard, where birds and birders congregate, would expose them to odors, fumes, and noise, and no doubt drive them away. I have never seen a warbler at a gas station. In addition, placing the fueling station on permeable pavement would allow toxic substances, if spills occurred, to percolate into groundwater.  The fueling station should be kept in its present location.	Alternative locations of the above-ground storage tanks will be carefully considered.
	We support Alternative 2, with the qualifying request that the fueling station at the maintenance area be relocated farther from the adjacent habitat to the south and east.	Alternative locations of the above-ground storage tanks will be carefully considered.
	The location of a refueling station at the southern end of the Yard's fence line would impact both birding and bird habitat. It should be noted that birders often view birds immediately in front of the proposed refueling station and thus birding would be impaired. Also the noise and activity from the station would seriously impact bird	Alternative locations of the above-ground storage tanks will be carefully considered.



	habitat. I propose that the refueling station be located elsewhere in the Yard where bird habitat is not affected. I suggest that it be positioned closer to its original location near the parking lot.	
	Placing the AST in the Maintenance Yard, above permeable pavement, introduces additional risk should a leak occur. Spilled fuel has the potential to penetrate permeable pavement, at which point it becomes exponentially more difficult to clean up. We recommend that NPS take serious precautions to ensure that the fueling station is equipped with adequate safeguards against pavement infiltration and runoff in the event of a leak.	Permeable pavement would not be used in the location of the fuel tanks. In addition, there would be a containment system installed surrounding the fuel pumps, as required by regulation. The exact location of the fueling station has not been determined.
	Figure 5 of Alternative 3 shows no exit from the yard. In addition it does not show where the proposed refueling station is located at the southern end of the Yard.	The exit from the Maintenance Yard, as shown in Figure 4, is adjacent to the parking lot. The exact location of the fueling station has not been determined. Alternative locations will be carefully considered.
	As also noted in Alternative 2, a refueling station that is positioned at the southern end of the extended yard at the fence line can be expected to create noise pollution that would be detrimental to good birding and bird habitat. As in Alternative 2 the better location for the refueling station would be nearer to the parking lot.	The exact location of the fueling station has not been determined. Alternative locations will be carefully considered.
	To organize the facilities within the Maintenance Yard so as to reduce the impact of noise and activity outside of the Yard. For example, work areas and fuel tanks should not be adjacent to the southern edge of the Yard, where noise and activity will disturb migratory bird populations on the other side of the fence.	The exact location of the fueling station has not been determined. Alternative locations will be carefully considered.
	However, from a birder's perspective, it would be better to locate the fueling station somewhere other than the back of the yard, to minimize activity in this area.	The exact location of the fueling station has not been determined. Alternative locations will be carefully considered.
<b>Capitol Stones</b>	If the capitol stones are removed, retain as many existing native trees as possible and maintain the commitment to restore this area to native forest.	The EA documents the natural habitat restoration measures that would be taken when the US Capitol Stones are removed.
	There is value in the capitol stones. They are a destination; I have often run into groups of looking for them. And they break up the area, creating different habitats and preventing it from being one big area. Keeping some of the stones (after insuring their stability for safety) might not be a bad idea.	The US Capitol Stones are the property of the Architect of the Capitol. Hosting a working stone storage area in a national park is incompatible with Rock Creek Park's enabling legislation.
	In the Maintenance Yard (referred simply as "Yard") the central issue is to determine the impact of removing the U.S. Capitol Stones (referred to as "stones"). Importantly, one needs to assess what will happen to bird habitat.	The National Park Service will make every effort to reduce tree loss and impacts from removal of the US Capitol stones. While the EA

	<p>A large fraction of the birding performed in Rock Creek Park occurs in the Yard's surroundings. About thirty percent of all birds reported in the Yard area come from the trees among and around the stones.</p>	<p>documents in general the natural habitat restoration measures that would be taken if the US Capitol Stones are removed, these measures could include establishing forest, edge and meadow habitat. This issue will be carefully considered during the design phase.</p>
	<p>"Return to natural habitat" needs to include significant efforts relative to eliminating invasive plants. The plants need to be eliminated and any new soil brought in needs to be invasive free. And planning/funding for continuing effort post-modification is required to prevent their return.</p>	<p>Comment noted.</p>
	<p>The "edge effect" created by the wooded area and the meadow provides important wildlife habitat. In several places the EA mentions restoring habitat in the area near the Capitol stones. The EA is silent on what vegetation the NPS would restore in that area. We strongly urge the NPS to restore the area with meadow vegetation to perpetuate the edge effect for wildlife. The area should be restored with native plants and a spring/water feature.</p>	<p>Comment noted. The habitat restoration could include establishing forest, edge and meadow habitat.</p>
	<p>It is not clear what "return to natural habitat" means</p>	<p>While the EA documents in general the natural habitat restoration measures that would be taken if the US Capitol Stones are removed, these measures could include establishing forest, edge and meadow habitat. This issue will be carefully considered during the design phase.</p>
	<p>(Capitol Stone area) Otherwise, this area undoubtedly shelters and provides habitat for wildlife, and we recommend you commit to establishing a mitigation plan that would be employed when, and if, the area is disturbed. This would include consideration of the timing of stone removals to avoid birthing seasons, sequencing of removals to minimize displacement, and care and treatment of wildlife injured or orphaned as an inadvertent consequence of disturbance....</p> <p>We support the area remaining as a meadow and recommend that it be included in existing park meadow management plans if not already.</p>	<p>The removal of the stones will take place outside of the spring and fall migration. While the EA documents in general the natural habitat restoration measures that would be taken if the US Capitol Stones are removed, these measures could include establishing forest, edge and meadow habitat. This issue will be carefully considered during the design phase.</p>
	<p>However, it would be ideal if this could be done in such a way that the mature trees that have grown up around them are preserved as much as possible. It is also important that the removal be done outside of the spring and fall bird migration, or at least outside of the hours between dawn and 9 AM and late afternoon.</p>	<p>The park will make every effort to minimize the number of mature trees removed. In addition, the removal of the stones will take place outside of the spring and fall migration.</p>
	<p>The proposed changes in Alternate 3 are not acceptable because of the extensive elimination of trees in the stones area and because of the noise and activity from the Yard.</p>	<p>The park will make every effort to minimize the number of mature trees removed. In addition, the removal of</p>

	Both issues would result in the excessive loss of bird habitat.	the stones will take place outside of the spring and fall migration.
<b>Birding Trail</b>	Bird Trail: The NPS notes the potential impacts to the sensitive natural environment that formalizing the presently informal bird trail could bring. Should the NPS move forward with this proposal, NPCA requests informational signs at the trail head, in the visitor's center and online (where applicable) that accurately describes the importance of this habitat and the sensitive nature of this habitat. In addition, during breeding season, the NPS should consider closing off this trail to visitors to ensure breeding birds and other sensitive species are not impacted by human presence.	The National Park Service will consider placing interpretive signage on the trail. However, we will not consider closing the trail, as this would hamper access to the bird viewing areas to the south of the Maintenance Yard during the migration season.
	The accessible birding trail is not properly plotted on the topographic slope and should be corrected in the Concept Plan.	The graphic is an aerial photo, on which the location of the trail is superimposed. The graphic is meant to display the conceptual location of the trail. The exact location of the trail will be determined during the design phase.
	I recommend that the birding trail on the western side of the Yard be constructed to permit passage of a wheel chair. The surface of the path need only be covered with gravel. A solid stone surface is not necessary and thus not recommended.	The National Park Service will improve the trail surface to allow for universal accessibility.
	The depiction of the "accessibility improvements to birding trail" in Figure 4 show a trail that would be removed from the existing fence, yet likely down slope in an unmanageable location. RCC fully supports improving accessibility for mobility-impaired individuals, however the location of the trail in Figure 4 is inappropriate. The trail should skirt the edge of the Maintenance Yard as it does now. Either a correction of the figure, or deletion of the figure, would avoid confusion in the future.	The graphic is an aerial photo, on which the location of the trail is superimposed. The graphic is meant to display the conceptual location of the trail. The exact location of the trail will be determined during the design phase.
	Finally, none of the plans show the birding path at the maintenance yard in the correct location. The path is in fact located immediately adjacent to the southwestern chain-link fence, not several yards away on a very steep slope, as drawn. Birders call this path "the fence line". It is the only level ground where a path could be easily and safely built. The terrain drops off very steeply from this point. Birders benefit because the path is at the top of the hill, enabling them to see birds easily in the high canopy across the ravine. For the birds, it keeps human visitors out of the forest and makes them less threatening as they forage for food.  In contrast, the path drawn on the plans would require installing a flight of stairs to descend the steep slope, as well as re-grading and removal of innumerable trees. I assume this was unintended.	The graphic is an aerial photo, on which the location of the trail is superimposed. The graphic is meant to display the conceptual location of the trail. The exact location of the trail will be determined during the design phase.

<b>Concerns Over Removal of Mature Trees</b>	<p>The NPS should avoid the removal of mature growth trees.</p> <p>The preferred alternative would result in the removal of potentially dozens of old-growth trees that contribute significantly to the park. NPCA urges the NPS to reduce the total impact on mature trees to the greatest extent possible. The removal of even one mature tree in a park surrounded by heavily urbanized environment should be minimized to the greatest extent possible. Design modifications that would eliminate the need to remove trees should be pursued at all proposed project sites.</p>	Some tree impacts are necessary to update and modernize park facilities. However, every effort will be made to minimize the number of mature trees removed.
	<p>Removing the fewest large trees. Trees absorb pollutants and store carbon, reducing the amount of carbon dioxide in the atmosphere. The trees of the District of Columbia filter 540 tons of harmful, health-threatening pollutants from the air each year. Trees help rain soak into the ground rather than run off the surface. Trees provide relief to physical and visual stress. Research shows that kids are better able to concentrate, complete tasks, and follow directions after playing in natural settings.</p> <p>The areas around the Nature Center, Maintenance Yard, and horse facility have many large mature trees. Every effort should be made to limit tree removal to those trees that are diseased and dying or pose a safety threat.</p>	Some tree impacts are necessary to update and modernize park facilities. However, every effort will be made to minimize the number of mature trees removed.
<b>Birds and Unique or Sensitive Species Concerns</b>	<p>Biological survey. We recommend that the affected area be surveyed and inventoried to determine whether any unique or sensitive species of plants or animals are found there. The Capitol stones, in particular, have been in place for more than a half-century and the possibility exists that they have become a refugium for sensitive or rare species. It is known that rocky outcrops are important micro-habitats with high levels of species endemism, and it would be reasonable that NPS make a determination about this.</p>	The National Park Service has extensively inventoried animal and plant species that exist in Rock Creek Park, including in the area of the US Capitol Stones. No rare, threatened or endangered species have been found in the area of the stones.
	<p>The 65-acre breeding bird census tract is not depicted in any figures. This is a crucial wellspring of historic knowledge regarding national bird populations, and readers of the Complex Development Plan should be able to assess how construction on the Complex, particularly the Horse Center, would affect the tract.</p>	It is unnecessary to mark the breeding bird census area on maps, as it is not impacted by the implementation of the preferred alternative.
<b>Habitat Concerns</b>	<p>While we understand the desire to add space for operations throughout the Complex as represented in Concept 3, we believe that the tradeoff of loss of trees and habitat is undesirable in a National Park. The expansion of the maintenance yard in the Concept 3 appears to encroach on critical bird habitat and should be reconsidered.</p>	<p>The southern expansion of the Maintenance Yard in the preferred alternative will now be limited to 35 feet, due to the presence of a potential cultural resource. The tree loss due to this reduced expansion will be minimal.</p> <p>In addition, the National Park Service is creating natural area as a result of this process.</p>

<b>Stormwater Drainage/ Management</b>	Storm drainage is a significant issue. Flows coming from the maintenance yard are eroding several gullies; something a new design should avoid. Handling a 1 or 2" rainfall may not be enough to protect the habitat. The approach to stormwater control should both contribute to the local water table and insure vehicles and yard sources don't pollute. In the past, run off has resulted in a small pond/large puddle, stable enough to grow frogs - a feature that would be nice if it could be restored.	The pond to the south of the Maintenance Yard was constructed by the park more than a decade ago to contain stormwater generated by the Maintenance Yard. The pond has since been compromised and it no longer holds water for extended periods. The park may restore the pond as part of stormwater management strategies considered during design.
	There is a stormwater gully on the southern slope of the Maintenance Area parking lot. There are two other gullies that need to be repaired as well - one from the stables and one from the nature center. The stable one is more significant and should be repaired in either of the build scenarios. The one from the nature center could just be included in the preferred alternative. This could be addressed during renovations.	This issue will be carefully considered during the design phase.
	The decision document should explicitly explain how stormwater runoff from the Horse Center will be addressed including consideration of increased rainfall in the future. Managing stormwater from the compost bin area should be a key component of Horse Center operations.	It is the National Park Service's best interest to mitigate stormwater management impacts to the greatest extent practicable, in accordance with local regulations and guidelines. The issue will be carefully considered during the design phase.
	The "fix it" alternative should also address the untreated stormwater runoff and existing impacts created by the existing facilities.	It is the National Park Service's best interest to mitigate stormwater management impacts to the greatest extent practicable, in accordance with local regulations and guidelines. The issue will be carefully considered during the design phase
	The NPS should be aiming for a 1.7" retention in line with the Energy Independence and Security Act.	It is the National Park Service's best interest to mitigate stormwater management impacts to the greatest extent practicable, in accordance with local regulations and guidelines. The issue will be carefully considered during the design phase
	[DDOE question] On page 13, under "Nature Center," the sixth bullet states that "flooding would be addressed." Are there any more details at this point?	The flooding references water issues within the Nature Center's lower levels. These issues will be carefully addressed during the design phase.
<b>Sidewalks</b>	However, we question the need for such a significant expansion of sidewalks along Glover Road between Military Road and the entrance to the Nature and Horse Center lots when a paved alternative, the Western Ridge Trail, already exists between Military Road and the Nature Center.	Sidewalks along Glover Road were included because the Western Ridge Trail is not accessible and efforts to make it accessible are not practical, as there would be significant resource impacts.

Creating new sidewalks or paved pathways to provide accessible connections between the bus stop on Military Road, Groves 13 & 14, the Miller Cabin, and the Nature Center Complex facilities is important. Since this would involve construction in areas where few sidewalks exist, this is an excellent opportunity for the NPS to use permeable pavement sidewalks wherever feasible throughout to manage stormwater and to design in a way that provides access for wheelchairs. In many areas where sidewalks are proposed, social trails have compacted the clay soil to preclude meaningful absorption of rain into the ground.	We agree. This issues will be carefully addressed during the design phase.
I strongly urge that new sidewalks be designed so as to avoid removing or damaging trees and made of permeable material.	We agree. This issues will be carefully addressed during the design phase.
With regard to new walkways, we are concerned that some may require clearing trees at the edge of the forest, or cause damage to their root systems such that they may eventually die. This is problematic not just due to the loss of these trees, but because trees previously sheltered by these edge trees are not necessarily wind firm, making them susceptible to blowdown and resulting in further functional forest loss.	Every effort will be made to minimize tree impacts, and to use pervious and flexible pavement where practical.
<p>Remove walkways along parking lots, which already provide a paved route for foot traffic, and in low-traffic areas such as the Horse Center area.</p> <ul style="list-style-type: none"> <li>- Remove the walkway along Glover Road NW between the turnoff to the Nature Center and the Maintenance Area, which are otherwise already connected via other trails in the Plan.</li> <li>- Remove the walkway bisecting the short paved loop trail near the Nature Center.</li> <li>- New walkways through the woods, such as the one from Glover Road to the Nature Center, should be located along routes that avoid tree removal.</li> <li>- The existing unpaved walkway along the western fence line of the Maintenance Yard should be maintained in its current physical location. The Plan depicts the trail going down the slope, creating hazardous walking and necessitating the removal of many trees.</li> <li>- Permeable pavement should be used for new paved walkways wherever possible.</li> </ul>	The plan envisions walkways for locations in which safety and accessibility cannot currently be assured. Every effort will be made to minimize tree impacts, and to use pervious and flexible pavement where practical. These issues will be carefully addressed during the design phase.
The maintenance yard parking lot is surrounded by lovely mature oaks of many species. Installing a sidewalk on the north side of the parking lot, which is bordered by a steep slope, would require cutting into the slope and undermining their roots. Loss of these trees seems greater than any advantage to having sidewalks in an area not heavily used by visitors except birders, who actually wander over the entire parking lot.	The plan envisions walkways for locations in which safety and accessibility cannot currently be assured. Every effort will be made to minimize tree impacts, and to use pervious and flexible pavement where practical. These issues will be

		carefully addressed during the design phase.
	A paved path from the Maintenance Yard parking lot to the horse stables would also cross this steep slope, a slope too steep for wheelchairs and perhaps many pedestrians. A gentler course could be achieved by redirecting the path to the east end of the maintenance yard parking lot near the office building.	This issues will be carefully addressed during the design phase.
	Finally, I question the need for an additional paved path bifurcating the already-paved short nature loop north of the Nature Center. This proposed walkway would transect a fountain and native plant garden. This seems unnecessary and ill-conceived.	The placement of paths will be evaluated carefully during the design phase, including existence, alignment and configuration.
<b>Bike Trail Safety</b>	Paths are in a really bad state. The surfaces are very bumpy and can lead to a crash on a bicycle and are a tripping hazard on foot. Obviously, the path collapsed by the Zoo/Tunnel some time ago and now traffic is flowing through the tunnel which is too narrow for traffic in both directions, and is generally not pleasant being so close to car traffic. There are stretches where a trail has been burnt in because the path is so bumpy that users prefer to go off the path to avoid the bumps. There are signs on the road that warn drivers of bicycles on the road and tell them to share the road, however, people dare not commute home past Broad Branch road where there is no path. Connections into the park are also lacking. Trails have been burnt in where people would like to access the park but there is no path and the trail can be quite treacherous.	Trail improvements and new trails for the Nature Center Complex are proposed in Alternatives 2 and 3. The state of trails in other areas of the park are beyond the scope of this plan.
	Use of the RCP path and other trails that currently ban bicycles would be a tremendous improvement over current conditions.	This is beyond the scope of this plan.
<b>Accessibility</b>	As they are drawn in the Complex Development Plan, however, many branches of the paths do not satisfy ADA requirements for slope-they appear to have been placed without attention to actual site topography. As such, during the design phase, the footprint of the paths will likely need to be adjusted to accommodate natural topography. Any modifications to the plans may put additional trees at risk, altering the tree damage stated in the Environmental Assessment. These changes make it crucial that NPS extend all possible effort to devise tree-friendly solutions to accessibility requirements. Installation of raised and/or permeable pathways, for example, has the dual benefit of conserving trees while mitigating stormwater runoff from this new 24,000 square foot surface.	Comment noted. This will be addressed in design development. Many paths on site will receive accessibility upgrades the action alternatives.
	It would be great if the current ad hoc path along the west side of the maintenance yard were improved for accessibility. However, there is not much space between the yard fence and the drop off towards Ridge Road, and the area to the west of the path is good habitat for birds.	The technical requirements of ABAAS would be met, while making every effort to minimize ground disturbance. This issue will be addressed in design development.

	Therefore, I suggest minimal improvement of this path, consistent with the need for better accessibility.	
	Other areas of the Park, such as around the lower horse rink on Ridge Road, offer excellent birding opportunities and could easily be made handicapped accessible.	This is outside the scope of this plan.
	NPCA would encourage the NPS to enhance accessibility to facilities for other visiting parties as well, including those with visual and hearing impairments, and language barriers.	Comment noted.
<b>New or Modified Alternative Proposed</b>	While we support Concept 2, we encourage NPS to draw certain aspects from Concept 3 and integrate them into the planning. For example, the operational needs of the park require attention, especially the lack of office and meeting space at the maintenance yard and Nature Center. Furthermore, the maintenance yard lacks functionality and needs additional space. We support a new building addition at the Nature Center for interpretative staff offices as envisioned in Concept 3 if it is built within the limits of the existing accessible parking area. Moreover, we support the construction of a two-story maintenance office building to add capacity to the maintenance yard on the footprint of the existing site. And if ways can be found to maximize the useful space within the yard without encroaching on the forest and wildlife habitat adjacent to the site on the south and southeast side, those should be encouraged.	Expansion of the Maintenance Yard is necessary for proper management and maintenance of the park. The park is also attempting to consolidate all the maintenance operations within the boundary of the Maintenance Yard. This consolidation will reduce impacts from maintenance yard operations on the surrounding area. The preferred alternative will now reflect a reduced (35 foot) south expansion of the Maintenance Yard.
<b>Best Management Practices/ Mitigating Measures</b>	As a frequent trail user of this area, I would like to encourage NPS to stagger any maintenance work so that parking remains available either at the picnic area, horse center, nature center, or maintenance area during the entirety of the improvement project.	It is very likely that construction will be phased, as the National Park Service anticipates that funding will be received over multiple fiscal years for individual portions of the project.
	Installing best management stormwater practices. Poorly controlled stormwater causes two significant problems. The volume and timing of runoff water can scour streambeds and accelerate erosion. And contaminants that stormwater carries, from parking lots, maintenance yards, and other areas, carry harmful pollution into streams and creeks. Demonstrating stormwater practices can also provide educational benefits for visitors.	The plan states that stormwater management would be improved through bio swales, permeable surfaces, and other methods.
	Although the Complex proposals do not include major revisions to its existing parking lots, NPS should integrate stormwater retrofits into these lots. Some stormwater management practices are expensive, and NPS must be mindful of the costs and maintenance requirements of the practices. For example, while pervious paving is a commonly used approach in parking lots, its cost and need for specialized equipment for maintenance may make it a poor fit for Rock Creek Park and its already strained resources. We urge NPS to consider appropriate alternatives such as infiltration trenches or bioswales.	This issue will be carefully considered during the design phase.
	An explicit goal should be established to reduce stormwater runoff from parking lots at the Nature Center,	The plan states that stormwater management would be improved



	the horse facility, the Maintenance Yard, new sidewalks, and any other impervious surface. This goal should consider the likely increase in rainfall as a result of a changing climate.	through bio swales, permeable surfaces, and other methods.
	We [Audubon Naturalist Society] urge the National Park Service to make a formal commitment to reducing stormwater runoff by enrolling in DOEE's Stormwater Retention Credit (SRC) program. The Nature Center Complex is served by the Municipal Separate Storm Sewer System (MS4), which contributes substantially to polluted runoff into the Potomac Watershed. The Complex's proximity to Rock Creek and its tributaries make it crucial that stormwater management on the site is maximized. Due to the large footprint of the Complex, enrolling in the SRC program would generate additional revenue for the National Park Service, and stimulate the SRC program's growth in MS4 areas of the city, where the program is struggling.	The National Park Service will explore the possibility of designing the project to enable the generation of stormwater retention credits.
	Efforts to reduce stormwater runoff around the Visitors Center: Initial planning of bioswales, rain gardens, permeable surfaces for roads and walkways, among other actions is a step in the right direction when it comes to managing the built environment's impact on the surrounding natural environment. NPCA has successfully helped reduce stormwater impacts on national parks sites in the recent past, such as at Valley Forge National Historical Park, and we look forward to providing additional design feedback as the project moves forward.	The plan states that stormwater management would be improved through bio swales, permeable surfaces, and other methods.
	Consider using ISI's Envision rating system for sustainable infrastructure to guide the design and construction of all new development in any of the build scenarios, in addition to a building specific rating system (like Leadership in Energy and Environmental Design) for the buildings themselves.	This issue will be carefully considered during the design phase.
	DOEE applauds the pursuit 4 in Alternative 3 on page 15 that it will "strive for net zero emissions". Is that meant to be net zero emissions or net zero energy use? Also is that only for the newly constructed buildings as part of this alternative or would that include all existing buildings as well? Consider expressly stating a goal to generate onsite renewable energy to the maximum extent practicable as opposed to procuring off-site generated energy.	This refers to net zero emissions. However, the National Park Service will make every effort to generate on-site energy, to the maximum extent practicable, when building are rehabilitated, with consideration for historic resources.
	In each of the alternatives where trees are to be removed, DOEE would encourage the team to replace them so as to avoid any net loss in tree canopy coverage and to pursue a net gain in canopy if possible.	There will be numerous opportunities to plant trees to replace, on a 1:1 diameter at breast height, those trees removed in the complex area. This includes the area to the south of the Maintenance Yard, when the Capitol Stones and the supplies piles are moved to within the Maintenance Yard.

In detailed design phases it would be worthwhile to pay attention to how areas inside maintenance yard are separated from visitor areas/paths outside. Currently the division is by chain link fence. While this provides good visibility through the fence for birds inside or flying overhead it is relatively unattractive the fence gets damaged and bent as material is piled against it and it allows invasive plants to spread inside the fence where they cannot easily be controlled. There may be a better boundary approach; perhaps, space permitting, low shrubs in some areas outside the fence.	This issue will be carefully considered during the design phase.
To make sure that any planned construction - under any alternative - does not take place during fall and spring migrations, when noise, activity, and disturbance could well have long-term consequences.	No tree removal will take place during the spring and fall migration. However, construction may be required during these periods. Every effort will be made to reduce construction impacts during these times.
Utilize only fully shielded, full cutoff outdoor lighting that is dark sky compliant to minimize the impact of light pollution and light trespass from the project site.	The project will follow National Park Service dark sky standards. This issue will be carefully considered during the design phase.
Incorporate green roofs on new and retrofitted buildings to enhance bird habitat.	This issue will be carefully considered during the design phase.
Mitigate the loss of mature trees at a 3:1 ratio elsewhere in the Nature Center Complex area.	There will be numerous opportunities to plant trees to replace, on a 1:1 diameter at breast height, of those trees removed in the complex area. This includes the area to the south of the Maintenance Yard, when the Capitol Stones and the supplies piles are moved to within the Maintenance Yard.
The Conservancy recommends that the NPS consider the guidelines in the SITES sustainable landscape program.	This issue will be carefully considered during the design phase.
Follow through on commitment to green infrastructure even without legal requirements: In preliminary plans, NPS has committed to complying with 2013 District of Columbia Stormwater Regulations. These regulations are currently under review by the District's Department of Energy and the Environment (DOEE), which has proposed exemptions for landscaped areas greater than 5,000 square feet with less than 2,500 square feet of impervious surface. This may exempt the interior courtyard of the Maintenance Area and the new horse turnouts from regulations depending on building materials. Certain provisions made for pedestrian trails may also exempt the planned accessible pathways from regulations. We ask that even if some areas of the Nature Center Complex are not legally required to maximize stormwater retention, that the National Park Service still make a good faith attempt to install green infrastructure and limit	The National Park Service will fully comply with DOEE regulations regarding stormwater management. During the design phase, the NPS will look for opportunities to enhance stormwater management and retention in the Nature Center Complex.

	interactions between runoff and the surrounding natural environment.	
	We suggest that during design, all possible efforts are made to ensure that the fueling station does not disturb wildlife by limiting odors, noise pollution, and runoff. This would best be accomplished by placing the fueling station at the north side of the Yard.	Alternative locations of the above-ground storage tanks will be carefully considered by the National Park Service.
<b>General Stakeholder/ Local Agency Support</b>	It would be so much more efficient to have a local advisory group comprised of some of these individuals, who could address these issues as plans were being developed, rather than to have plans made in isolation and then have these individuals seek to modify them in subsequent comments.	The National Park Service will explore the possibility of involving a community engagement process to inform design development during the design phase.
	The Conservancy will form an ad hoc committee with representatives from relevant interest groups who are strongly interested in re-development and improvement of the area around the Nature Center Complex. The committee will include representatives from the Conservancy, horse center/riders, birders, cyclists, and others and act as a sounding board and advocacy group for NPS plans moving forward.	Comment noted.
	RCC would welcome an opportunity work with NPS to identify and rank the priority for specific activities during that time and would be serve as a convener of stakeholders throughout the complex's development.	Comment noted.
<b>Consultation</b>	Pursuant to the National Capital Planning Act (40 U.S.C. § 8722(b)(J) and (d)), NCPC reviews and approves federal plans and projects in the National Capital Region. As such, we request that NPS coordinate with NCPC staff to submit the project for Commission review.	The National Park Service will comply with all statutory requirements for commission review of the project designs.

## APPENDIX E: ERRATA

The following corrects errors to Figure 2, page 10 of the EA. Map failed to show the cleared grassy slope and picnic area east of the Horse Center stables, and also corrects an error that showed Cross Trail #6 and White Horse Trail converging at a trail to the indoor riding ring. There is no such trail.

