

Rock Creek Park

Upper Beach Drive

Management Plan / Environmental Assessment

PUBLIC COMMENT ANALYSIS REPORT

July-August 2022 comments

Public Comment Period

As part of the National Environmental Policy Act (NEPA) process, the National Park Service (NPS) involved the public by holding a 32-day public comment period from July 11, 2022 through August 11, 2022 on the Upper Beach Drive Management Plan / Environmental Assessment (Plan / EA). The public comment period and virtual meeting were announced by sending a letter and email blast to agencies, stakeholders, and other potentially interested parties from a mailing list established for the Project. Project materials were posted on the NPS Planning, Environment, and Public Comment (PEPC) website ([linked here](#)) included the Plan / EA, the July 18, 2022 virtual public meeting presentation PDF, a video recording of the July 18th virtual public meeting, and a link to the District Department of Transportation (DDOT) June 2022 Upper Beach Drive Management Plan – Traffic Study, which revised the October 2021 Traffic Study used in the Plan / EA. Written comments could be submitted via the PEPC website or mail.

Description of Public Meeting

A virtual public meeting was held on July 18, 2022 to describe the existing conditions in Rock Creek Park; review issues and impact topics analyzed and dismissed in the Plan / EA; present alternatives for the management of upper Beach Drive, including the preferred alternative; review the impacts of the alternatives; and invite the public's comments on the Plan / EA. The public meeting was held from 6:30 p.m. to 8:00 p.m. via Microsoft Teams. Approximately 200 attendees, including NPS staff, participated in the virtual meeting. A video recording of this meeting is available at this [link](#).

The public meeting included a formal presentation given by NPS staff followed by a Question and Answer session where meeting attendees were provided an opportunity to ask questions, provide feedback on the Plan / EA, and share issues, concerns, and ideas via the Microsoft Teams chat box. NPS staff answered questions as the meeting time allowed. The presentation addressed the following:

- Meeting Purpose
- National Environmental Policy Act (NEPA)/National Historic Preservation Act (NHPA)
- Project Background, which included issues and impact analyzed and dismissed in the Plan / EA and the purpose and need for the management of upper Beach Drive

- Proposed Alternatives and the Preferred Alternative
- Summary of Impacts of the Alternatives
- How to Comment
- Questions and Answers

Summary of Correspondences

A total of 3,696 pieces of correspondence were received from the public, organizations, and other interested parties. A piece of correspondence is considered the entire document received from a commenter. This includes letters, e-mails, comments entered directly into PEPC, and any other written comments provided by postal mail. Of the 3,696 pieces of correspondences, 125 (or approximately 3 percent) were identified as duplicates, meaning that the commenter entered the same correspondence more than once. Of the 3,696 pieces of correspondence, 92 (or approximately 2 percent) were identified as form letters. Some form letter correspondences were identical between different commenters, whereas other form letter correspondences were tweaked by the commenter.

More than 2,700 correspondences (or approximately 76 percent) were received from residents of Washington, DC. Correspondences were also received from residents of Maryland, Virginia, and other states across the United States.

Correspondences were received from park visitors, park neighbors, those who commute through or around Rock Creek Park via motor vehicle or bicycle, and members or official representatives of several organizations or groups, including:

- Advisory Neighborhood Commissioners (2B05, 3C05, 3F02, 3/4G02, 3/4G03, 3/4G06, 3/4G07, 4A04, 4D01, and 6A06)
- Audubon Naturalist Society
- BicycleSPACE
- Brightwood Community Association
- Capital Trails Coalition
- Casey Trees
- Chevy Chase Village Board of Managers
- Concerned Citizens of Hawthorne
- Crestwood Citizens Association
- CrewIQ
- District of Columbia Council (Ward 3)
- DC Bike Party
- DC Ward 4 Mini-Commission on Aging
- Delicious Democracy
- Georgetown Software House
- Greater Washington Board of Trade
- George Washington University Climate and Health Institute
- Imprint Fund
- K Street Alternative Energy

- Mid-Atlantic Bike Racing Association (MABRA)
- Mighty Earth
- Montgomery County Road Runners
- National Parks Conservation Association
- NewMexico.Run
- People's Alliance for Rock Creek (PARC)
- Potomac Appalachian Trail Club (PATC)
- Rock Creek Conservancy
- RunWashington
- Ward 1 Neighbors for Safer Streets
- Ward 3 Bicycle Advocates (W3BA)
- Ward 5 for All
- Washington Area Bicyclist Association (WABA)
- WFH - Wholeness
- Wild Places Prints
- Woodside Civic Association - Green Committee
- World Bicycle Day

Summary of Comments

Within the 3,696 pieces of correspondence, a total of 11,098 individual comments were identified. This number excludes duplicate correspondences and matching text within correspondences that were identified as form letters. A comment is a piece of text within a correspondence that speaks to a particular issue topic. These comments were reviewed and categorized by topic area on a common subject.

Commenters provided comments in several general topic areas. **Table 1** identifies the number of correspondences that included comments within each topic area. For example, 2,394 correspondences included comments expressing the commenter's support for Alternative 2: Full-Time Closure for Recreation. **Appendix A** presents detailed "concern statements" organized by comment topic areas. These concern statements summarize the comments within the comment topic area. **Appendix A** also includes the NPS responses to each concern statement.

Table 1: Correspondence Summary by Comment Topic Areas

Topic Area	Number of Correspondences Containing Comments Related to Topic Area¹	Percent of Correspondences Containing Comments Related to Topic Area²
Alternative 2: Full-Time Closure for Recreation Support	2,394	67%
Visitor Use or Experience (describes how visitors use or experience Beach Drive and Rock Creek Park)	2,268	64%
Editorial (see following section)	2,073	58%
Safety (discusses issues, impacts, or concerns related to safety)	1,344	38%
Transportation Studies and Impacts (discusses issues, impacts, or concerns related to motor vehicles)	1,059	30%
Impact of Alternative 3: Seasonal Closure for Recreation (NPS Preferred) on Visitor Use or Experience (describes how this alternative's impact on visitor use or experience Beach Drive and Rock Creek Park)	712	20%
Natural Resources (discusses issues, impacts, or concerns related to air quality, water resources, noise pollution, climate change, etc.)	584	16%
Suggestion for a New Alternative	410	11%
Park Operations (discusses issues, impacts, or concerns related to how park rules and policies are implemented or enforced, maintenance, how to mitigate or eliminate the impacts of increased visitation, etc.)	329	9%
Mental or Public Health (discusses impacts on mental or public health)	316	9%
Alternative 3: Seasonal Closure for Recreation (NPS Preferred) Support	314	9%
Accessibility (discusses access/amenities for visitors with mobility impairments or strollers)	243	7%
Wildlife And Wildlife Habitat (discusses issues, impacts, or concerns related to wildlife, their habitat, and rare, threatened, and endangered species)	238	7%
Alternative 1: No-Action Alternative Pre-COVID-19 Pandemic Management Support	136	4%
Park Management (discusses issues, impacts, or concerns related to related to park management, rules, and policies)	84	2%

Topic Area	Number of Correspondences Containing Comments Related to Topic Area ¹	Percent of Correspondences Containing Comments Related to Topic Area ²
Comment is Out of Scope or Not Relevant to the Project	67	2%
Socioeconomics (discusses issues, impacts, or concerns related to socioeconomics)	62	2%
Cultural Resources (discusses issues, impacts, or concerns related to historic districts or cultural landscapes)	5	0.1%

¹The ‘Number of Correspondences Containing Comments Related to Topic Area’ column does not equal 3,696 (i.e., the total number of correspondences) or 11,098 (i.e., the total number of individual comments) because each single correspondence could contain multiple unique comments that fall into different topic areas. A single comment could have also been categorized into more than one topic area.

²For each topic area row, the percent of total correspondence containing comments regarding that topic area is calculated by the following: $[Number\ of\ correspondences\ containing\ topic\ area\ comments / (total\ number\ of\ correspondences - number\ of\ duplicate\ correspondences)] * 100$. For example, the percent of total correspondences containing comments expressing the commenter’s support for Alternative 2: Full Time Closure for Recreation is calculated by the following: $[2,394 / (3,696 - 125)] * 100 = 67\%$.

Editorial Comments

Approximately 58 percent of correspondences contained comments that were categorized as “Editorial.” Comments were categorized as Editorial if they fell into one of two groups.

First, comments were categorized as Editorial if they expressed support for opening or closing Beach Drive to motor vehicles, but the comment was too vague and additional text in the correspondence (if provided) did not provide enough context to identify which specific alternative the commenter supported. Assumptions about which specific alternative the commenter supported were not made. Examples of these comments include the following:

- “Please, please re-open Beach Drive to vehicle traffic.”
- “I support this action to close to traffic”
- “Im a DC resident and in full support of this so I can take my son out for fun in the weekend/weekdays.”
- “Keep beach drive open for biking, walking and hiking.”
-

Secondly, comments were categorized as Editorial if they did not fall into one of the other comment topic areas or were opinions. The following presents a summary of these types of Editorial comments. Note that this summary is not meant to be an exhaustive list of all Editorial comments received.

- The EA:
 - Is incomplete, insufficient, lacks quality data, and contains assumptions and flawed logic

- Should be redone
- Fails to analyze a reasonable range of alternatives
- Fails to provide “sufficient evidence and analysis” to support its conclusions
- NEPA Process
 - NEPA guidelines were violated because revised June 2022 Traffic Study was released a week after the comment period opened, thus denying the public a full 30-day comment period on the document.
 - The NPS needs to explain the role and if the revised June 2022 Traffic Study was part of the decision-making process.
 - This project requires a full Environmental Impact Statement (EIS), instead of an EA, because the project will have impacts “significantly affecting the quality of the human environment.”
- NPS Organic Act
 - The selection of Alternative 2: Full-Time Closure for Recreation would be consistent with the Organic Act.
 - The selection of any decision to prioritize motor vehicles would be inconsistent and contradict the Organic Act.
 - The dismissal of relevant impact topics from detailed analysis violates NPS duties under the Organic Act. The NPS failed to adequately assess or explain impacts on visitor use and experience, transportation operations and safety, historic districts, cultural landscapes, and wildlife and wildlife habitats.
 - The NPS is violating the Organic Act because the NPS is overstepping its jurisdictional bounds. The NPS is operating outside the scope of its jurisdiction in proposing to consider traffic and air pollution, and mitigation measures, outside the park. The US Congress has not conferred any ability for NPS to use its System units as a resource for mitigating negative impacts outside of its System units.
- Rock Creek Park and/or Beach Drive closed to motor vehicles has been a recreational asset, an oasis, and makes Washington, DC an attractive and more livable city. The closure of Beach Drive to motor vehicles since 2020 has been a successful experiment.
- The decision to re-open Beach Drive to motor vehicles is a difficult decision with many competing interest and considerations.
- The NPS should not give in to motor vehicle lobbyists.
- The NPS should not give in to bicycle lobbyists.
- Keeping Beach Drive closed to motor vehicles is an opportunity to do something unique for Washington, DC, would serve as an example for the national park system, and would lead by example in the face of climate change.
- Other cities have closed major parks to motor vehicles (e.g., Central Park in New York City).
- Opening Beach Drive to motor vehicles and/or the Alternative 3: Seasonal Closure for Recreation (the NPS preferred alternative in Plan/EA):
 - Is antithetical to the NPS mission of preserving “unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations”
 - Is antithetical to the reason Rock Creek Park was established
 - Is not a compromise

- Is a creative compromise
 - Is a disappointment, frustrating, and/or a bad decision
 - Prioritizes commuters over visitors and nature
 - Does not reflect the position of local elected bodies and officials, the public, and a majority of those who submitted comments during the July 8, 2021 – August 22, 2021 public scoping period
 - Is irresponsible given climate change and the city's history of pedestrian and bicycle fatalities
- Beach Drive's construction and maintenance is paid for by all taxpayers. Closing Beach Drive to motor vehicle traffic would not be an equitable allocation for a public good that is supported by all taxpayers.
 - Parks and/or cities are for people, not motor vehicles.
 - The NPS has a duty to recreation and wildlife, not to commuter traffic.
 - Rock Creek Park and/or Beach Drive was never intended to be and should not be a commuter route.
 - There are plenty of dedicated spaces for motor vehicle traffic. Drivers have, can, and will adjust to Beach Drive being closed to motor vehicles.
 - Pedestrians and bicyclists do not have as many options as motor vehicles do.

Conclusion

The great number of comments received from the public are greatly appreciated and reflect the strong interest in the future of Beach Drive. The public feedback helped shape the NPS decision making process and is further addressed in the Plan/EA's separate Finding of No Significance (FONSI) document.

