

NATIONAL LINKS TRUST &  
NATIONAL PARK SERVICE

# ASSESSMENT OF EFFECTS

ROCK CREEK PARK  
GOLF COURSE  
REHABILITATION

WASHINGTON, DC  
DRAFT JULY 2023

QUINN  
EVANS

# ASSESSMENT OF EFFECTS

Rock Creek Park Golf Course Rehabilitation  
Rock Creek Park  
Washington, DC

Prepared for:  
National Links Trust  
National Park Service

Prepared by:

Quinn Evans (Prime)  
2101 L Street NW  
Washington, DC 20037

WSP  
1250 23<sup>rd</sup> Street NW  
Washington, DC 200037

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## **Rock Creek Park**

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# 1.0 PROJECT SUMMARY

## **Overview**

In October of 2020, the National Park Service (NPS) signed a 50-year lease with National Links Trust (NLT) to operate three historic public golf courses in Washington, DC. National Links Trust, a 501(c)(3) nonprofit, is dedicated to protecting and promoting accessible, affordable, and engaging public golf courses to positively impact local communities across the United States. Currently, National Links Trust is focused on the opportunity to improve the golf courses and enhance the facilities at the three public courses in our nation's capital: East Potomac, Langston, and Rock Creek. Each of these sites has a rich and storied history, but none are currently achieving their full potential. Rehabilitating and operating the public golf courses in the nation's capital is a once-in-a-generation opportunity that aligns precisely with the organization's mission.

NLT is proposing to rehabilitate the Rock Creek Park Golf Course as part of its long-term management of the course. The Rock Creek Park Golf Course, situated on the east side of Rock Creek Park at the intersection of 16th and Military Road NW on approximately 100 acres, consists of an 18-hole parkland-style golf course that was designed by golf course architect William S. Flynn under the Office of Public Buildings and Grounds and primarily built between 1921 and 1927. The rerouting and widening of Military Road in the late 1950s required the modification of several holes on the front nine. Between 1963 and 1964, the NPS built a new clubhouse at the golf course to replace the original building, a farmhouse that predated the course's construction. In 1991, Rock Creek Park Golf Course was listed in the National Register of Historic Places (National Register) as a contributing resource to the Rock Creek Park Historic District (#91001524). Additionally, a 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register.

Of the three municipal golf courses in the District, the Rock Creek Park Golf Course is the most challenging and the least played. Encroachment by the dense wooded areas of the course has dramatically narrowed the fairways on the already difficult holes of the back nine. The lack of sunlight caused by the trees has also caused agronomic issues, leading to weedy greens and bare fairways. Because of these issues, the prior operator abandoned these holes in 2015. The course suffers from the lack of a functional irrigation system, creating unhealthy and sparse turf conditions in the summer. The realignment and expansion of Military Road in the early 1950s led to the loss of three original William Flynn holes on the front nine, requiring alterations to the design that ultimately led to a front nine filled with short par fours and very long par threes. The current layout is thus extremely challenging for the beginning golfer but not long enough for the more experienced player. The existing clubhouse lacks amenities and is not accessible to persons with disabilities.

The rehabilitation of the property includes programmatic elements focused on accessibility for golfers of different skill levels and abilities, including a driving range,

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short game practice areas, a 9-hole regulation course, and a 9-hole par three course. Also included in the proposed rehabilitation of Rock Creek Golf Course is a dedicated space and headquarters for First Tee of Greater Washington, DC, the local chapter of a nationwide youth sports and educational program that uses golf to teach kids and teens life lessons and leadership skills. Of the three golf courses, Rock Creek Park is logically the first of the three golf courses for NLT to rehabilitate due to its current conditions as well as the relatively straightforward approach to making it a more profitable and accessible course.

The NPS is the lead agency for Section 106 compliance under the National Historic Preservation Act of 1966 (NHPA), 54 U.S.C. § 306108, and its implementing regulations (36 CFR Part 800). This Assessment of Effects report evaluates the potential effects to historic properties from the proposed rehabilitation of the Rock Creek Park Golf Course (“undertaking”) as outlined in 36 CFR 800.5(a).

## **Finding of Effect**

This Assessment of Effects Report (AOE) analyzes two alternatives and provides the following documentation required by 36 CFR 800.11(e):

- Description of the undertaking;
- Description of the project and each alternative;
- Description of the area of potential effect and identification of historic properties;
- Assessment of effects on historic properties from each alternative; and
- Copies and summaries of views provided by consulting parties and the public.

Based on the schematic design for the rehabilitation of the Rock Creek Park Golf Course and the application of the criteria of adverse effect, this assessment finds that the undertaking would have an adverse effect on the Rock Creek Park Historic District and the Rock Creek Park Cultural Landscape. The proposed undertaking would directly alter the characteristics that qualify the properties for inclusion in the National Register in a manner that would diminish the integrity of their location, design, setting, materials, workmanship, feeling, or association.

The project would demolish the existing Mission 66-era clubhouse, which is a contributing resource to the Rock Creek Park Historic District and Rock Creek Park Golf Course Cultural Landscape. The proposed modification of the golf course from an 18-hole course to a 9-hole regulation and 9-hole par-3 course would alter the historic routing and William Flynn’s 1924–1926 design of the course and the proposed driving range would alter character-defining views, impacting the cultural landscape’s integrity of design.

Archaeological investigations identified one site, the J. Pilling Farm Site (Pending Site Number) in the northeastern part of the golf course. Based on Phase I archeological study, the site is considered potentially eligible for listing in the National Register. At a meeting held on March 9, 2023, involving the NPS and NLT, it was agreed that impacts

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to the site will be avoided by redesign of the improvements planned for this location, such as a new trail. No grading will be carried out and all new features will be constructed using fill soils only, so there will be no disturbance of archeological deposits. This approach avoids an adverse effect to this resource.

**Preparers**

Patti Kuhn Babin – Architectural Historian, Quinn Evans

John Bedell – Archaeology, Cultural Resource Practice Leader, WSP

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## 2.0 DESCRIPTION OF UNDERTAKING

### **Project Location and Overview**

The Rock Creek Park Golf Course is in Northwest Washington, DC, near the northern apex of the District of Columbia. Located within Rock Creek Park, the golf course is north of Military Road NW and west of 16th Street NW. The golf course is approximately 100 acres (figures 1 and 2).

The Rock Creek Park Golf Course consists of an 18-hole parkland-style golf course primarily built between 1921 and 1927 and designed by golf course architect William S. Flynn. Today, the Rock Creek Golf Course is a 14-hole course (four holes of the original back nine are currently not in play) with a counterclockwise progression of play centered on the clubhouse. Except for the location of six holes that were shifted in the 1950s due to the widening of Military Road, the overall design dates to William Flynn's expansion of the course from a 9-hole course to an 18-hole course in 1926. The front nine holes are characterized by visually open spaces, gentle slopes, and wide fairways. The back five holes are characterized by narrow fairways, dense forests, and steep slopes. While the locations of tee boxes, hazards, and greens have changed, these modifications have not altered the overall character of the course. Certain holes and fairways, such as the first hole, have remained in the same location as originally designed by Flynn.

The course currently suffers from deferred maintenance that has impacted its playability as well as its facilities. The Mission 66-era clubhouse, built in 1964 to replace a farmhouse that predated the golf course, has limited facilities and supports only a snack bar and pro shop. The present building does not adequately support golf course operations and is not accessible to persons with disabilities. The maintenance building, built in the 1980s, is highly visible due to its location along the entrance drive to the clubhouse and parking area. On the golf course, woody vegetation has encroached on the fairways, greens, and tees. This is most evident in the internal, historically forested areas of the course. Over the years, vegetation has been planted on the front nine without following any distinct golf course style. In other instances, invasive vegetation, especially vines, has covered original stands of trees and left a dense, impenetrable border that obscures views into the naturalized forested areas. The course suffers from poor turf conditions caused by traffic patterns, poor cart paths, poor drainage, tree root competition, a poor irrigation system, and shade from encroaching trees.

### **Purpose and Need for the Action**

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

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

The proposed project is needed to address the following concerns:

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

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Figure 2. Rock Creek Park Golf Course vicinity map.

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### **Alternative 1: No Action**

Under the no-action alternative, NLT would continue to operate the Rock Creek Park Golf Course for the remaining duration of its existing 50-year lease. The golf course would remain generally in its current configuration as shown on the existing site plan (figure 3). Isolated repairs and improvements would be made on an as-needed basis. The golf course would provide basic facilities for golf course operations and golfers, with little accommodation for non-golfers. The course would continue to lack a driving range.

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

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

Vegetation would be maintained on an as-needed basis with a focus on invasive species management and preventing forest vegetation from further encroaching on the remaining holes. The existing forest stands may continue to shade out turf grass in some areas, causing some areas of bare dirt. The course would continue to be irrigated using municipal water exclusively.

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

The maintenance facility would remain prominently placed next to the golf course parking lot in a highly visible location. It would remain at its current size, which is insufficient for a modern golf course maintenance operation because it is difficult to store maintenance equipment, golf carts, and dumpsters, as well as commonly used aggregates, sand/soil/gravel. The current facility has no infrastructure to support safe handling and storage of pesticides or equipment repairs. The current building also lacks a HVAC system and water.

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#### LEGEND

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

Figure 3. Alternative 1: Existing Conditions

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### **Alternative 2: Rehabilitation of the Rock Creek Park Golf Course (preferred)**

#### **Summary**

Under the proposed action, the Rock Creek Park Golf Course would be rehabilitated, focusing on the following primary elements:

##### **Golf Course Rehabilitation**

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

##### **Golf Course Entrance and Clubhouse**

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

##### **Maintenance Building**

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

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

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Figure 4: Alternative 2: Rehabilitation of the Rock Creek Park Golf Course

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### **Project Description**

The proposed undertaking follows the treatment recommendations outlined in the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course. The Secretary of the Interior's Standards for the Treatment of Cultural Landscapes approach for the Rock Creek Park Golf Course is Rehabilitation.

#### *Golf Course Rehabilitation*

The sections below focus on the rehabilitation of the landscape comprising the Rock Creek Golf Course, including the routing of the courses, vegetation, cart paths and trails, irrigation, and lighting (figure 4).

#### *Golf Course Routing*

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

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

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

The proposed 9-hole par-3 course would start and end at the clubhouse and occupy the southwestern portion of the golf course, using many of the corridors of the original back 9 holes, including the 14th and 16th holes. Holes would range from 100 to 180 yards.

Some modest grading of the existing golf course would be required to establish the proposed layout focused on the locations of new tees and greens.

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The proposed rehabilitation of the golf course adheres to the following recommendations in the 2019 Cultural Landscape Report:

- Maintain the parkland–style character of the course originally designed by noted golf course architect William Flynn.
- Consider maintaining the key design characteristics of the two nine-hole loops, one located in the more gently rolling topography and the other located in the wooded area, with each 9-hole loop beginning and ending at the clubhouse. As an added benefit, consider supporting different skill levels on the course.
- Over time, the course’s hole lengths and playing corridor widths have been reduced due to encroaching vegetation. While avoiding large-scale tree removal, the course could be rehabilitated to more closely match the lengths and playing corridor widths envisioned by Flynn.
- Maintain the diversity of view experiences afforded by the more open interior versus the sight lines into the forest found along the perimeter.<sup>1</sup>

#### Cart Paths

Under the proposed action, NLT would establish an improved cart path system for the golf course that removes redundancy, continues to provide maintenance vehicle access, and avoids sensitive natural areas. The cart path would be approximately 8-12 feet in width, travelling approximately 3 miles through the course. The surface would likely be asphalt throughout. The exact locations, total length, and materials of the cart paths would be subject to refinement as design of this element progresses.

The proposed cart paths adhere to the following recommendation in the 2019 Cultural Landscape Report:

- Determine a new path system that removes redundancy, takes into account conflicts between user groups (pedestrian, carts, and vehicles), considers safety, provides maintenance vehicle access, reduces impacts to the course layout, and avoids impacts to sensitive natural areas.

#### Vegetation

Creation of the revised course described above would require specific portions of the existing forest stands to be removed. Removal of vegetation would be focused on invasive species, some encroaching successional forest, and specific mature trees. Removal of mature trees would be limited to the minimum clearing needed to rehabilitate the golf course and establish the new par-3 course.

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<sup>1</sup> Joseph et al, *Cultural Landscape Report*, 234, 238, 241-243, 246.

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

- Overall condition of the tree
- Excessive shade
- Restricted air movement
- Root encroachment
- Debris being deposited on turfed areas
- Loss of original design intent
- Safety
- Pest Infestation

The clearing described in this plan is the maximum anticipated extent of tree/forest removal. Clearing would likely take place using a phased approach that would start with a minimal clearing approach with additional clearing taking place only as needed.

Under the proposed undertaking, invasive species would be targeted for recurring control and removal as part of regular golf course management.

The proposed rehabilitation of the golf course adheres to the following vegetation recommendations in the 2019 Cultural Landscape Report:

- Rehabilitate the parkland-style vegetation (natural forested areas, rolling topography, and lush grassed fairways) to the extent that it is agronomically possible for healthy turf and reflects the course design.
- Preserve specimen and mature trees that enhance the setting, especially a line of eastern red cedars that are associated with a former farm lane.
- Remove invasive and non-contributing vegetation growing along the perimeter and where it encroaches and impedes playability of the course, especially on the back nine, and restore the hole corridors to the full extent of the original design.
- Maintain a native forest edge along the eastern boundary of the golf course.
- For the front nine fairways, continue to care for the existing vegetation and limit introduction of new vegetation to ensure that the open character of the course is maintained. For the forested back nine fairway corridors, remove encroaching and invasive vegetation.

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- The naturalized areas within and surrounding the golf course will complement the design, not affect playability, be free of invasive vegetation, and be part of a wildlife corridor program.

#### Meadows

Under the proposed action alternative, NLT would incorporate natural meadow habitat throughout the site. More than 8 acres of meadows would be scattered in patches throughout the rehabilitated golf course, and approximately 4.5 acres on the northern edge of the golf course (historically used for holes 12 and 13) which would be repurposed as meadow habitat (see figure 4).

#### Ecological Trail

Under the proposed action alternative, NLT would establish an ecological trail (also referred to as a nature trail) through the golf course for non-golfers to experience the site on foot, separately from the cart path. This pedestrian trail would be an approximately 1-mile loop trail, with the trailhead at the club house and offering a loop to the north and west. Approximately one-half mile of the trail, extending north from the clubhouse along the historic farm lane, would be approximately 6 feet wide and paved with asphalt along the farm lane and crushed stone/gravel along the remainder of first half-mile. This half of the trail would be fully accessible under the Architectural Barriers Act Accessibility Standard (ABAAS). The remaining half mile of trail would be approximately 5 feet wide and mulched as it loops back to the club house (see figure 4).

#### Irrigation Pond

Under the proposed action alternative, NLT would install several new facilities to provide additional sources of water for irrigation beyond the city's water system. NLT would develop a pond for irrigation either in a natural depression in the fairway of the 12<sup>th</sup> hole or potentially in the vicinity of hole 5 of the proposed short course (see figure 4). The irrigation pond would capture stormwater runoff within the site for irrigation purposes. NLT would also capture the runoff from the roof at the clubhouse, driving range, and cart barn in cisterns for irrigation purposes.

#### Lighting

Exterior facility lighting would be limited to the clubhouse (including driving range bays and cart storage), maintenance, and parking lot areas. Fixtures would be Dark Sky Friendly (i.e., approved by the International Dark-Sky Association). Lighting would be timed appropriately so that areas are only lit at times when it is necessary for safety reasons.

Golf course lighting would be focused only on the driving range, 9<sup>th</sup> hole of the short course, 9<sup>th</sup> hole of the long course, and the practice greens near the clubhouse. The driving range lighting would be minimized to 50 yards to allow the ball tracing technology to function. Beyond this distance, little to no lighting would be used. Lighting would consist of a combination of edge, pole-mounted, and roof-mounted lighting. All lighting would be timed appropriately so that areas are only lit at times when it is necessary for

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functionality of the course. When the course is closed, all golf course lighting would be off.

#### *Golf Course Entrance and Clubhouse*

##### *Site Circulation and Parking*

At the golf course entrance at 16th Street NW and Joyce Road, the proposed rehabilitation would include a new multiuse path (up to 10 feet wide, where topography allows) along Joyce Road and up to the golf course to promote multimodal transportation and allow pedestrians to enter the course safely from 16th Street (figure 5).

The proposed new parking area would remove the northernmost section of the existing lot and retain and reconfigure the southern two sections. The new parking area would be slightly smaller than the existing parking area, providing approximately 82 parking spaces among new shade trees. The existing maintenance area would be cleared and would be available for overflow parking, providing 31 additional parking spaces. Additional overflow parking, providing 11 parking spaces, would be provided along the Golf Course Access Road (figure 5). Amendments to the site design, including a designated drop-off area for rideshare and the new bike/pedestrian path with bike parking, would encourage alternative transportation options. The parking area would include permeable paving to decrease stormwater runoff. Connections between the proposed clubhouse driving range, golf cart barn, the community pavilion, the historic farm lane, and the trail to the large pollinator meadow would be fully accessible.

Modifications to circulation adhere to the following recommendations in the CLR:

- Enhance the golf course's entry appearance from Joyce Road NW, which has served as the primary route of vehicular access to the site since its initial development.
- Maintain the parking area in the general location but consider the following strategies: re-evaluate the number of parking spaces required, add canopy or understory trees to lessen the heat island effect caused by the large, paved area, and consider using porous pavement or other low-impact development (LID) options for the parking lot to reduce stormwater runoff.<sup>2</sup>

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<sup>2</sup> Joseph et al, *Cultural Landscape Report*, 245.

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Figure 5. Alternative 2: Diagram showing proposed parking and bicycle and pedestrian path from 16th Street NW and areas for parking.

#### Clubhouse

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

The proposed clubhouse would be in the vicinity of the existing clubhouse and original 19th-century clubhouse that preceded it, at the start and end of both the 9-hole regulation course and par-3 course (figure 6). It would be oriented to enhance and emphasize the panoramic views from the clubhouse to the golf course, sited to preserve

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the mature trees that surround the existing clubhouse, and nestled into the existing topography of the site.

From the main approach, the proposed clubhouse would appear as a one-story structure, with the ground level revealing itself as the grade drops away from the entrance. The design of the new clubhouse would consist of a contemporary design that is compatible with the rich historical context of Rock Creek Park. The massing of the building would draw from traditional forms and materials including natural stone, wood timber, horizontal siding, and slate shingles (figure 7). These traditional elements would be combined with large expanses of glass, steel elements, and other features to make it unmistakably modern.

The replacement of the Mission 66 clubhouse and the design of the new clubhouse adheres to the following recommendations in the CLR:

- To better serve the needs of golf course operations, explore the possibility of either rehabilitating, adding onto, or replacing the clubhouse in its general location.
- Develop a planting plan for the clubhouse, parking area, and entry drive area, and assess the condition of the existing mature shade trees from the 1920s and 1960s.
- Enhance and emphasize the panoramic views from the clubhouse to the golf course.<sup>3</sup>

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<sup>3</sup> Joseph et al, *Cultural Landscape Report*, 236, 246.

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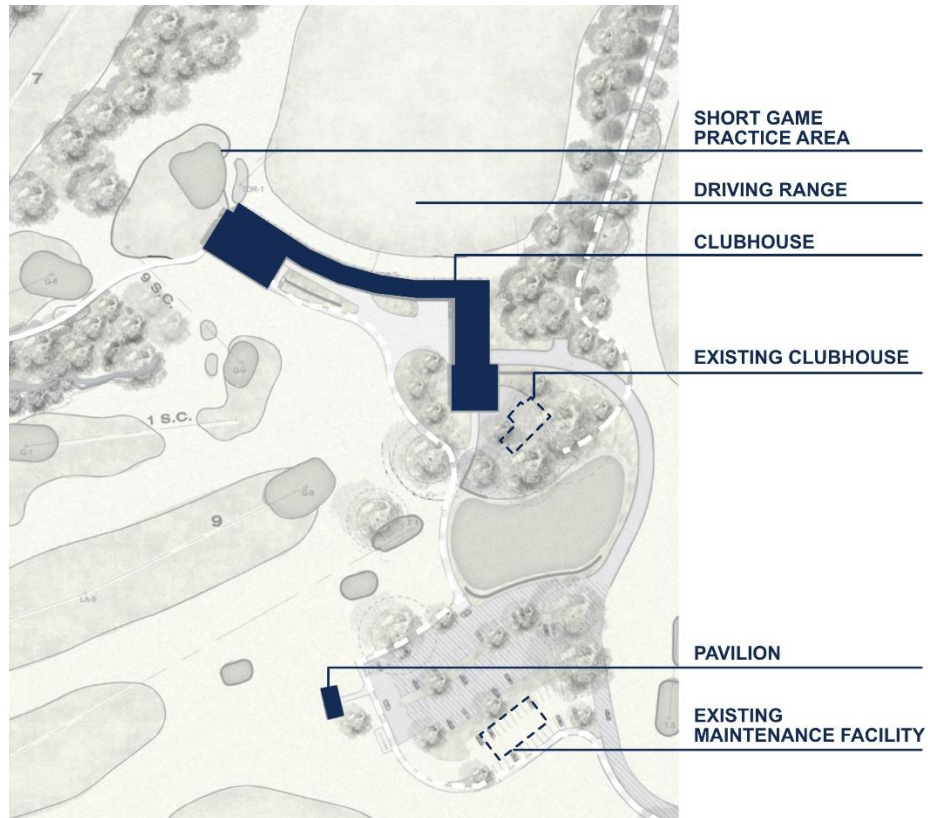


Figure 6: Alternative 2: Proposed clubhouse, driving range, pavilion, and vicinity of clubhouse.



Figure 7: Alternative 2: Proposed clubhouse, west elevation.

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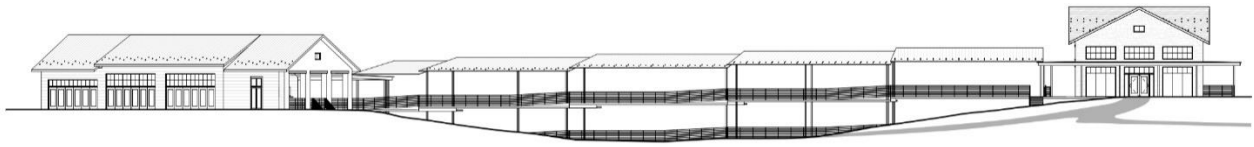


Figure 8. Alternative 2: Proposed clubhouse (right), driving range (center), and cart barn (left)

#### Driving Range and Cart Storage Building

The proposed two-tier driving range would occupy the space that is currently the 9th and 10th holes. The proposed range would sit within an existing basin that is already cleared of trees, so little to no tree removal occurs with the construction of the range, and the natural topography, combined with the relatively transparent nature of the structure itself, minimizes its visual impact on the landscape. For operational efficiency, ease of food service, and to provide a continuous accessible route throughout the facility, the range structure would be connected directly to the clubhouse on each level and step down along its length following the grade of the range line (figure 8).

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

The construction of a new driving range adheres to the following recommendation in the CLR:

- Assess the feasibility of adding a driving range while maintaining the parkland-style characteristics.<sup>4</sup>

#### Pavilion

The proposed pavilion would stand on the west side of the parking lot and in the vicinity of the clubhouse. The one-story, open-air structure would serve as an event space for golfers and non-golfers alike. The footprint would be approximately 60 feet by 40 feet. The pavilion would use similar architectural language and materials as the clubhouse, driving range, and cart barn (figure 9).

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<sup>4</sup> Joseph et al, *Cultural Landscape Report*, 237.

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Figure 9. Alternative 2: Location of the proposed pavilion.

#### Stormwater Management

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

- micro-bioretenion devices to catch and filter run off
- bio-swailes to catch and filter run off
- a modest system of properly sized storm drains to catch and divert run off around buildings and to provide outfall for the filtered water to existing drainage ways.

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

#### Maintenance Building

The existing maintenance building would be demolished. The proposed 7,500 square-foot maintenance building would stand along the east side of Joyce Road near its intersection with the golf course entrance road (figure 10). By working with the existing topography and planting a mix of evergreen trees, large deciduous trees, and mixed shrubs, the new building would be screened from the road and golf course. Like the

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pavilion, the maintenance facility would use similar architectural language and materials as the clubhouse, driving range, and cart barn (figure 11).

The demolition and replacement of the maintenance building adheres to the following recommendation in the CLR:

- A more appropriate maintenance facility building should be constructed to better meet the needs of golf course operations and to improve the entrance's appearance. A combination of a new structure, with a more visually pleasing fence and properly designed vegetative screening, would better integrate this facility with the property.<sup>5</sup>

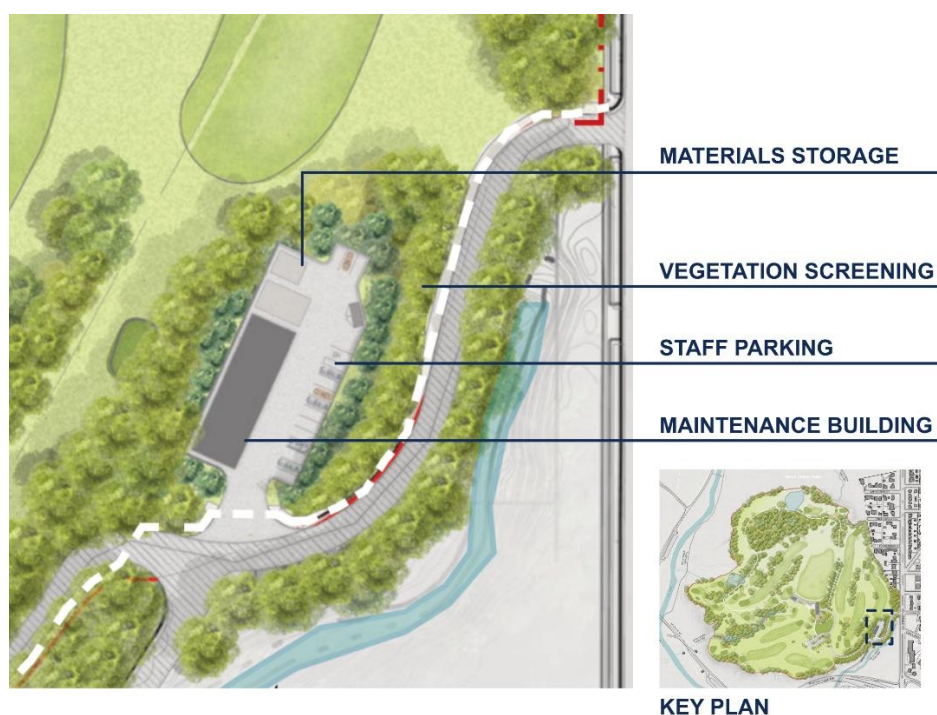


Figure 10: Alternative 2: Proposed Maintenance Building Location



Figure 11: Alternative 2: Proposed Maintenance Building Southeast Elevation

<sup>5</sup> Joseph et al, *Cultural Landscape Report*, 237.

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### 3.0 IDENTIFICATION OF HISTORIC PROPERTIES

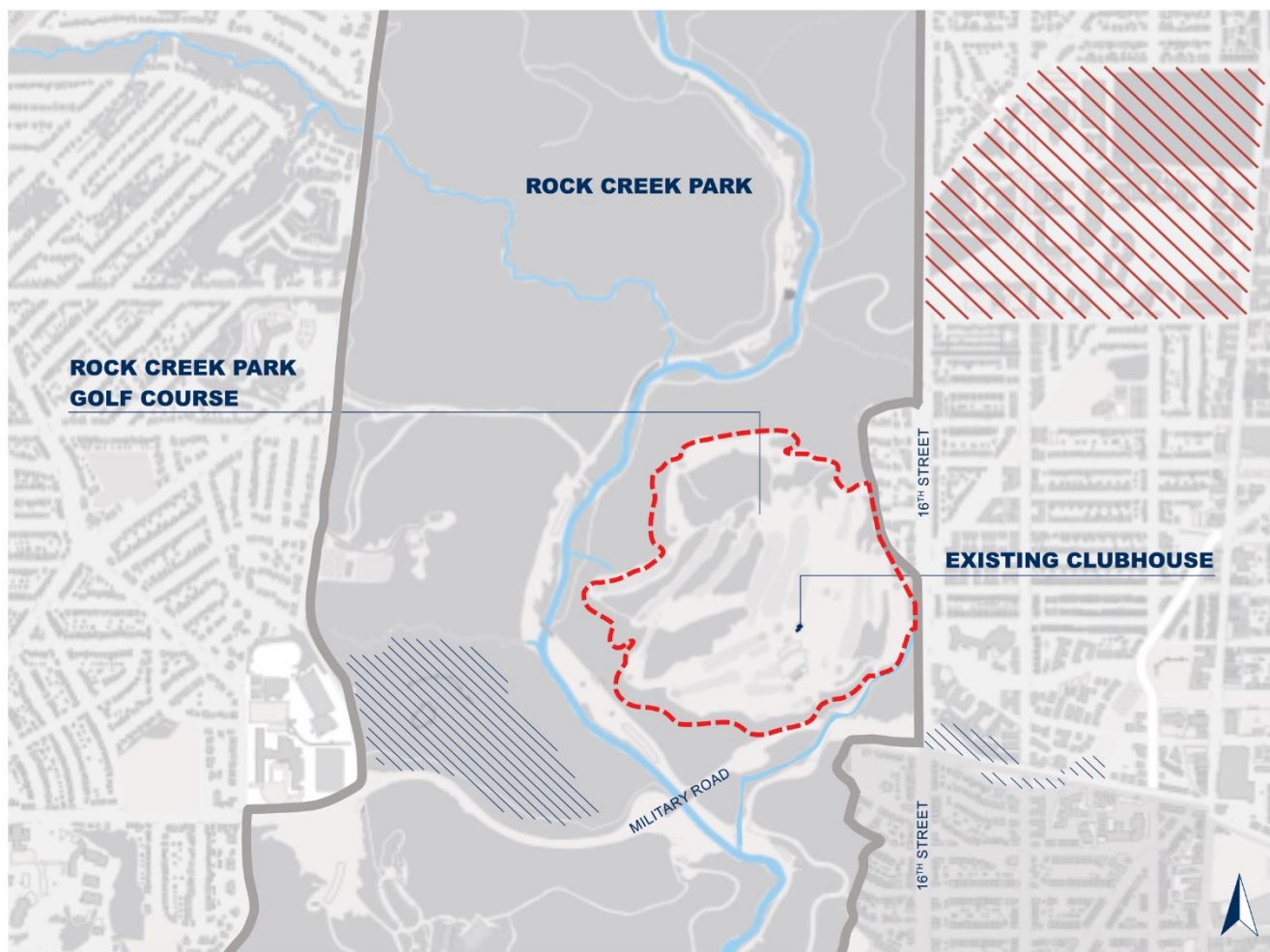
#### **Area of Potential Effect**

The NPS defined the Area of Potential Effects (APE) to account for all possible effects of the proposed acquisition and development on historic properties (36 CFR 800.16). As stated in 36 CFR 800.2(c), a project's APE is the geographic area or areas within which the undertaking may cause changes in the character or use of historic property.

The proposed Area of Potential Effect (APE) for this project is the lease/cultural landscape boundary of the Rock Creek Park Golf Course. Identified historic resources in the APE are the Rock Creek Park Golf Course and the Rock Creek Park Historic District; historic resources that contribute to the golf course and/or historic district are also included to account for potential direct physical effects as well as visual effects from the proposed rehabilitation project (figure 12).

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## ROCK CREEK PARK GOLF COURSE MAP

### KEY






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

Figure 12: Map showing the Area of Potential Effect

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### **Identified Historic Properties in the APE**

The NPS has completed several relevant cultural resource studies on the Rock Creek Park Golf Course that aided in the identification of historic properties: *Links to the Past: A Historic Resource Study of National Park Service Golf Courses in the District of Columbia* (2017); *Rock Creek Golf Course Cultural Landscape Inventory* (2017); *National Park Service Golf Courses in the District of Columbia East Potomac Park, Langston, and Rock Creek, Cultural Landscape Report, Treatment Guidelines* (2019); *Phase Ia Archeological Study, and Phase Ib Work Plan* (2022); and *Phase Ib Archeological Study, Rock Creek Park Golf Course, District of Columbia* (2023).

### **Rock Creek Park Historic District (National Register Listed)**

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

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

### **Rock Creek Park Golf Course Cultural Landscape (National Register Eligible)**

The 2017 Cultural Landscape Inventory for the Rock Creek Park Golf Course established that the golf course is individually eligible for listing in the National Register under Criterion A in the area of recreation and under Criterion C in the area of landscape architecture. The Rock Creek Park Golf Course represents a significant period in the history of golf in the United States and the development of municipal recreation in Washington, DC. Additionally, it is an important local work of golf course architect

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William S. Flynn and a largely intact example of a course designed during the period referred to as the Golden Age of golf course architecture. The recommended period of significance for the course is 1921–1927 and 1963–1964, correlating with the original design of the course by William S. Flynn, its construction under the Office of Public Buildings and Grounds, and the construction of a new clubhouse as part of the NPS's Mission 66 initiative.

The following sections were taken from the 2019 Cultural Landscape Report for the Rock Creek Park Golf Course.

#### *Summary Description*

##### *Land Use*

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

##### *Topography*

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

##### *Spatial Organization*

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

##### *Circulation*

Formal vehicular circulation includes Joyce Road NW and the Golf Course Access Road, which are features from the initial period of significance. During the Mission 66 period, the circle drive in front of the clubhouse was added and the parking lot was expanded to meet visitor needs. It was during this time that some of the more formally defined sidewalks were added around the clubhouse. A pre-existing farm lane north of the clubhouse was incorporated into the circulation of the golf course. The progression of play through the golf course continues to consist of two self-contained counterclockwise loops: the front nine holes and the back nine holes. Formal circulation for pedestrians and golf carts was not planned for the course; as a result, a series of social trails have developed, disappeared, and shifted throughout the life of the course.

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#### Buildings and Structures

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

The Mission 66-style clubhouse opened to the public in 1964 to replace a farmhouse that had previously served as the clubhouse. With limited modifications, it reflects the original design intent of the Mission 66 period. The clubhouse has a one-story front elevation facing the entrance drive and a two-story rear elevation facing the golf course. The design features vertical siding and brick exterior walls topped with a low-pitched gable roof. A prominent cantilevered roof on the rear elevation shelters a large window wall that overlooks parts of holes 9, 10, and 18 and visually connects the interior and exterior spaces. The clubhouse is a contributing resource to the cultural landscape. A one-story, metal-clad maintenance building, located on the south side of the parking lot, was erected in 1982. This maintenance building is considered a non-contributing feature to the cultural landscape.

#### Vegetation

A character-defining feature of this cultural landscape is the juxtaposition of the visually open front nine with limited trees and the densely wooded or forested sections along the fairways of the back nine. This is due in part to land use prior to the golf course's creation when the area associated with the front nine was clear for grazing and orchards. However, it was not devoid of trees, as Flynn intentionally incorporated mature trees into the placement of greens and introduced limited trees to divide fairways. With the back nine, Flynn identified existing large stands of trees and incorporated them into his design for the fairway, carving out defined, tree-lined corridors. Flynn also incorporated a row of red cedars (*Juniperus virginiana*) lining a historic farm lane into the course design. During the second period of significance, red oaks (*Quercus rubra*)<sup>6</sup> and magnolias (*Magnolia* spp.) were added around the clubhouse building. The original turf grasses have been replaced, as is to be expected with long-term use of a golf course.

#### Views and Vistas

Flynn's embrace of the dramatic topography of the cultural landscape created picturesque views throughout the course along the fairways toward the greens. This was

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<sup>6</sup> The 2022 tree survey completed as part of the rehabilitation project identified one Red Oak tree and two Red Maple (*Acer rubrum*) trees in the vicinity of the club house.

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further enhanced with the incorporation of mature trees and the strategic retention of forest stands throughout the course. The encroachment of vegetation has affected the integrity of some of the historic views originally found in the golf course.

#### *Natural Systems and Features*

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

#### *Integrity*

The Rock Creek Golf Course retains integrity of location. The golf course occupies its historic location with a minor modification to the size of the site since the first period of significance. The cultural landscape is bound by 16th Street NW to the east, forested condition to the north, the hill overlooking Rock Creek to the west, and Military Road NW to the south. In 1958, the expansion and realignment of Military Road NW prompted the removal of the original holes 3, 4, and 5 and the removal of acreage along the southern border of the golf course.

The Rock Creek Park Golf Course retains integrity of design. William Flynn originally designed a 9-hole, parkland-style golf course in 1923 that he expanded to 18 holes in 1924–1926. Flynn’s design incorporated the existing conditions of the site, including vegetation and dramatic undulating topography. The result was the creation of two self-contained, 9-hole loops. The open character and more generous topography on the front nine appealed to the novice player, whereas the placement of the back nine in wooded corridors on steep hillsides appealed to more advanced players. Flynn’s design remained until the 1958 expansion of Military Road NW, which required the removal of some of the original front nine holes and impacted the course’s integrity of design.

The Rock Creek Park Golf Course retains integrity of setting. The Rock Creek Park Golf Course was constructed on the site of a former farm and was contained within Rock Creek Park and bounded by suburban developments along 16th Street NW to the east, forest to the north and west, and Military Road NW to the south. This relationship has been retained to the present day, even with the realignment of Military Road NW.

The Rock Creek Park Golf Course contains integrity of materials. Flynn incorporated existing vegetation, i.e., mature trees, into the fairway corridors of the front nine. These specimens are still present and include the row of cedar trees located along the golf cart path. For the back nine, Flynn identified larger stands of trees and incorporated these trees into the design of the course routing. As a part of Mission 66 improvements to Rock Creek Park, the clubhouse was constructed to replace a pre-existing farmhouse that had previously served that function. With the construction of the Mission 66 clubhouse, new plantings were installed in the vicinity of the structure. These trees are still present in the cultural landscape.

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The Rock Creek Park Golf Course retains integrity of workmanship. The layout and design intent of the holes from the first period of significance are still evident and a testament to the original workmanship in the construction of the course. The original clubhouse, a farmhouse that preexisted the construction of the course, was demolished in 1963. A Mission 66-era clubhouse replaced the original clubhouse at this time. The Rock Creek Park Golf Course's Mission 66 clubhouse remains the same as during the original construction of the resource.

Rock Creek Park Golf Course retains integrity of feeling. The retention of the Flynn plan and associated design elements has ensured that the cultural landscape evokes the first period of significance. Modifications in the form of placement of some of the holes associated with the front nine, the introduction of golf carts to the course, and the construction of the clubhouse during the second period of significance have not diminished the feeling of the public course.

Rock Creek Park Golf Course retains integrity of association. The golf course is associated with the larger pattern of federally owned public golf courses within Washington, DC, from the twentieth century.<sup>7</sup>

**Table 1. Rock Creek Park Golf Course Cultural Landscape Character-Defining Features**

Landscape Characteristic	Character-Defining Feature
Land Use	<ul style="list-style-type: none"><li>Continual use as a public golf course</li></ul>
Topography	<ul style="list-style-type: none"><li>Varied natural topography throughout the site. Gentle slopes and rolling hills on the front nine, steep dramatic hills on the back nine</li></ul>
Spatial Organization	<ul style="list-style-type: none"><li>Counterclockwise organization of golf course around clubhouse. Routing of holes 1–18</li><li>Open, relatively treeless front nine and densely forested back nine</li><li>Circulation patterns connecting the clubhouse to neighborhoods to the east</li></ul>
Circulation	<ul style="list-style-type: none"><li>Golf Course Access Road</li><li>Joyce Road NW between Sixteenth Street NW and Golf Course Access Road</li><li>Golf cart path segment between clubhouse and Underwood Street</li></ul>
Buildings and Structures	<ul style="list-style-type: none"><li>William Flynn's 1924–1926 era design for Rock Creek Golf Course</li><li>Mission 66 clubhouse</li></ul>

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<sup>7</sup> Maureen D. Joseph et al, *Cultural Landscape Report, Natural Park Service Golf Courses in the district of Columbia, East Potomac Park, Langston, and Rock Creek: Treatment Guidelines* (Washington, DC: National Park Service 2019), 135-152.

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Landscape Characteristic	Character-Defining Feature
Vegetation	<ul style="list-style-type: none"><li>• Contrast between vegetation on the front and back nine with the front nine characterized by its open, relatively treeless landscape and the back nine defined by the dense areas of mature forests that surround the fairways</li><li>• Native deciduous vegetation along the perimeter of the course</li><li>• Native deciduous vegetation between fairways throughout the course</li><li>• Row of red cedars (<i>Juniperus virginiana</i>) along road north of clubhouse</li><li>• Red oak trees (<i>Quercus rubra</i>) surrounding clubhouse<sup>8</sup></li><li>• Magnolia tree (<i>Magnolia grandiflora</i>) west of clubhouse</li></ul>
Views and Vistas	<ul style="list-style-type: none"><li>• View between fairways and greens on holes throughout course</li><li>• Picturesque views of natural landscape throughout the course</li></ul>
Natural Systems and Features	<ul style="list-style-type: none"><li>• Stream crossing fairway 17</li></ul>

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<sup>8</sup> The 2022 tree survey completed as part of the rehabilitation project identified one Red Oak tree and two Red Maple (*Acer rubrum*) trees in the vicinity of the club house.

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*Figure 13. Aerial showing Rock Creek Golf Course (Google Earth).*

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*Figure 14. View of Green 1 looking east toward clubhouse (Quinn Evans 2022).*



*Figure 15. View of Hole 12, looking west.*

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*Figure 16. View of Golf Course Entrance Road, looking northeast (Quinn Evans 2022).*



*Figure 17. View of existing maintenance building, looking southeast (Quinn Evans 2022).*

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*Figure 18. Various exterior and interior views of the existing Mission 66-era clubhouse (Quinn Evans 2022).*

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*Figure 19. View of the former farm road and allée of red cedars, looking north.*



*Figure 20. View from current 15th hole looking northeast.*

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Figure 21: Comparison of 1927 Flynn Course and Existing Course.

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### Archaeological Resources

A Phase Ia archeological assessment of the ROCR Golf Course was completed in July 2022.<sup>9</sup> This assessment concluded that archeological resources might be present at the Golf Course, including the remains of two farms shown on nineteenth-century maps of the property. Fieldwork for a Phase Ib shovel test survey of the property was completed in January 2023.<sup>10</sup> During the survey, all the areas where ground-disturbing activity is proposed were investigated. One archeological site was identified: the J. Pilling Farm.

The J. Pilling Farm Site is the remains of a farm shown on historic maps from the 1850s into the early 1900s. The site is in the northeastern part of the golf course, around the 10<sup>th</sup> green and the 11<sup>th</sup> tee. Parts of this area have already been impacted by golf course construction. The area of the 11<sup>th</sup> tee in particular has been severely graded. However, a central area of the site between the 10<sup>th</sup> green and the 11<sup>th</sup> tee appears to be more intact. The site as a whole measures roughly 250 by 300 feet or roughly an acre, while the more intact area measures 75 by 175 feet. Based on the findings of the Phase Ib study, the site appears to be potentially eligible for listing on the National Register of Historic Places.

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<sup>9</sup> John Bedell and Nancy Holst, *Phase Ia Archeological Study, and Phase Ib Work Plan, Rock Creek Park Golf Course, District of Columbia*, prepared for Quinn Evans Architects and the National Links Trust by WSP USA Inc., Washington, DC. 2022.

<sup>10</sup> John Bedell and Nancy Holst, *Phase Ib Archeological Study, Rock Creek Park Golf Course, District of Columbia*, prepared for Quinn Evans Architects and the National Links Trust by WSP USA Inc., Washington, DC. 2023.

## 4.0 IDENTIFICATION OF EFFECTS

### Criteria of Adverse Effect

This effect assessment is based on the criteria of adverse effect as defined in the National Historic Preservation Act regulations (36 CFR 800.5). The criteria of adverse effect are defined as follows:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative. [36 CFR 800.5(a)(1)]

Examples of adverse effects may include:

- Physical destruction of or damage to all or part of the property;
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, which is not consistent with the Secretary's standards for the treatment of historic properties (36 CFR part 68) and applicable guidelines;
- Removal of the property from its historic location;
- Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
- Neglect of a property that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

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### **Determination of Effect**

The following analysis is an assessment of the effects of the project on historic properties and is based upon the Section 106 criteria of adverse effect.

**Table 2** below assesses the effects of the proposed alternatives (No Action and NPS Preferred) on the Rock Creek Park Golf Course. The assessment of effects to the Rock Creek Park Golf Course is analyzed by the landscape's contributing features as identified in the 2017 CLI and 2019 CLR.

**Table 3** below assesses the effects of the proposed alternatives to the Rock Creek Park Historic District.

The findings are summarized below.

#### **Alternative 1: No Action**

##### *Rock Creek Park Golf Course Cultural Landscape and Rock Creek Park Historic District*

The no action alternative would result in no effect to the Rock Creek Park Golf Course Cultural Landscape and Rock Creek Park Historic District. Under the no-action alternative, NLT would continue to lease and manage the golf course. The course would continue operation as it is currently and standard maintenance practices for the course and buildings would continue. Overall, there would be no alterations to the cultural landscape or historic district under the no-action alternative that would impact their character-defining features in a manner that would diminish the historic integrity of the resources.

##### *Archaeological Resources*

The no action would result in no adverse effect to archaeological resources as no ground disturbing activities would occur.

#### **Alternative 2: Rehabilitation of the Rock Creek Park Golf Course (Preferred)**

##### *Rock Creek Park Golf Course Cultural Landscape*

The undertaking would result in an adverse effect to the National Register-eligible Rock Creek Park Golf Course Cultural Landscape because of the demolition of and/or alterations to contributing features of the landscape that would collectively diminish its integrity. Project components that would contribute to the adverse effect are the demolition of the existing clubhouse, which would remove a contributing feature, and the construction of the new driving range/cart barn structure and modifications to the William Flynn-designed golf course, which would alter character-defining features of the cultural

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landscape related to spatial organization, structures (Flynn's 1924–26 golf course), and views.

The demolition of the clubhouse contributes to the adverse effect as it permanently removes a contributing feature of the golf course. The current clubhouse does not meet the program needs for the project. It does not have adequate facilities for food service and does not have suitable space for educational and community functions. As designed, the current clubhouse does not meet the 2021 International Building Code Chapter 11 Accessibility requirements, nor does it follow the Architectural Barriers Act Accessibility Standard (ABAAS). The only known modification made to make the building more accessible since its construction is a wooden ramp that provides access to the rear (northwest) door of the upper floor. It is unknown if the ramp meets current accessibility requirements. There is no known accessible route to the existing restrooms, which are located on the lower floor of the clubhouse. The restrooms also do not meet accessibility requirements.

As part of the design process, NLT completed a survey and analysis of the clubhouse to determine if it could be preserved and reused with modifications or incorporated into a new design to meet program needs. The investigations indicated that the existing clubhouse is not good a candidate for reuse or integration into a larger facility due to its small size, lack of accessible facilities and routes, and extensive use of masonry interior partitions, making any floor plan changes costly and difficult. The extent of the changes required to make the building accessible and compatible with the programmatic needs of the proposed use would substantially impact the historic integrity of the building. Consequently, NLT determined that the demolition and replacement of the existing clubhouse with a completely new facility on the site better meets the needs of NLT, golf course patrons, and the community.

The adverse effect from the demolition of the clubhouse would be minimized through the design of the new clubhouse, which would consist of a contemporary design that is compatible with the historic massing and materials of buildings and structures in Rock Creek Park.

Changes to the routing of the William Flynn-designed golf course, modifications to its overall design from the construction of the 9-hole regulation course and the par-3 course, and the alteration and obstruction of views between the historic greens and holes from the construction of the proposed driving range structure would contribute to the adverse effect (see Table 2). The effect would be minimized. The proposed course routing would continue to be two 9-hole loops that begin and end at the clubhouse and are played counterclockwise. Although changes to Flynn's 1924–26 design would occur, the proposed regulation and par-3 courses would restore and incorporate many of Flynn's original tees, greens, and fairways into the proposed design. The driving range structure would be sited within an existing basin and the natural topography, combined with the transparent nature of the structure, would minimize its visual impact on the landscape.

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**Table 2. Assessment of Effects, Rock Creek Park Golf Course Cultural Landscape**

Character-Defining Feature	Alternative 1: No Action	Alternative 2: NPS Preferred (Undertaking)
<b>Land Use</b>		
Continual use as a public golf course	<i>No Effect</i>	<i>No Adverse Effect.</i> The property would continue to be used as a public golf course. The integrity of association would not be diminished.
<b>Topography</b>		
Varied natural topography throughout the site. Gentle slopes and rolling hills on the front nine, steep and dramatic hills on the back nine	<i>No Effect</i>	<i>No Adverse Effect.</i> While some grading would occur with the construction of new tee boxes and greens, around the new clubhouse, in the location of the irrigation pond, and to construct new cart paths, the overall varied topography of the course would remain intact. The rolling hills of the historic front nine holes would be apparent around the vicinity of the clubhouse and holes 1–5 of the 9-hole regulation course. Holes 6–8 of the regulation course would incorporate the steep, dramatic hills characteristic of the historic back nine holes. The par-3 course would incorporate many of the historic corridors and the topographic character of Flynn’s back nine holes. The integrity of design and workmanship would not be diminished.
<b>Spatial Organization</b>		
Counterclockwise organization of golf course around clubhouse. Routing of holes 1–18	<i>No Effect</i>	<b>Adverse Effect.</b> The proposed 9-hole regulation course and a par-3 course would modify the course’s historic routing and diminish the integrity of design. The effect would be minimized, as the proposed course routing would continue to be two 9-hole loops that begin and end at the clubhouse. All holes of the regulation course would continue to play counterclockwise. Holes 3–9 of the par-3 course would continue to play counterclockwise.

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Character-Defining Feature	Alternative 1: No Action	Alternative 2: NPS Preferred (Undertaking)
Open, relatively treeless front nine and densely forested back nine	<i>No Effect</i>	<i>No Adverse Effect.</i> The 9-hole regulation course would incorporate both the open, relatively treeless character of the historic front nine and the densely forested back nine. The proposed clubhouse, driving range, cart barn, and pavilion would be clustered in the location of the existing clubhouse and would not interrupt the spatial organization of the course or impact the integrity of design.
Circulation patterns connecting the clubhouse to neighborhoods to the east	<i>No Effect.</i>	<i>No adverse effect.</i> The principal vehicular circulation to the clubhouse from the surrounding neighborhoods to the east would continue to be Joyce Drive NW. The integrity of design would not be diminished.
<b>Circulation</b>		
Golf Course Access Road**	<i>No Effect</i>	<i>No Adverse Effect.</i> The routing of the Golf Course Access Road would not be modified as part of the proposed undertaking. The integrity of design would not be diminished
Joyce Road NW between Sixteenth Street NW and Golf Course Access Road	<i>No Effect</i>	<i>No Adverse Effect.</i> The proposed undertaking, including the addition of an accessible route from Sixteenth Street NW to the golf course, would not alter the routing of Joyce Road. The integrity of design would not be diminished
Golf cart path segment between clubhouse and Underwood Street	<i>No Effect</i>	<i>No Adverse Effect.</i> The proposed nature trail would continue to use the historic routing of the farm road (current golf cart path) north of the clubhouse. The integrity of design would not be diminished.

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Character-Defining Feature	Alternative 1: No Action	Alternative 2: NPS Preferred (Undertaking)
<b>Buildings and Structures</b>		
William Flynn's 1924–1926-era design for Rock Creek Golf Course**	<i>No Effect</i>	<b>Adverse Effect.</b> Flynn's 1924–26 design of would be modified as part of the construction of the 9-hole regulation and par-3 courses and would diminish integrity of design. Additional modifications include the construction of the practice green, short course area, driving range, the removal of holes 12 and 13 from play, and the addition of a meadow and irrigation pond, which would change the overall design, routing, and layout of the course. The adverse effect would be minimized by the restoration and incorporation of many of Flynn's original tees, greens, and fairways into the proposed design.
Clubhouse	<i>No Effect</i>	<b>Adverse Effect.</b> The Mission 66-era clubhouse would be demolished, impacting integrity of design, materials, and workmanship. The adverse effect would be minimized through the design of the new clubhouse, which would consist of a contemporary design that is compatible with the historic massing and materials of buildings and structures in Rock Creek Park.

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Character-Defining Feature	Alternative 1: No Action	Alternative 2: NPS Preferred (Undertaking)
<b>Vegetation</b>		
Contrast between vegetation on the front and back nine with the front nine characterized by its open, relatively treeless landscape and the back nine defined by the dense areas of mature forests that surround the fairways	<i>No Effect</i>	<i>No Adverse Effect.</i> Proposed tree clearing would be limited to specific areas and would not occur site wide. The undertaking would include selective tree removal along the course's perimeter and fairways and in the vicinity of tees and greens. Selective tree removal would bring back the historic character of the course and the width of the fairways, which were present during the period of significance, and promote turf health. Proposed tree clearing to create new routing and fairways for Hole 3 of the regulation course, holes 1 and 2 of the par-3 course, and the short game practice green would occur in areas that were historically not densely wooded. Clearing required for Hole 7 of the par-3 course would occur in an isolated area and would not modify the overall contrast between the open front nine and the dense vegetation of the back nine. The integrity of design and materials would not be diminished.
Native deciduous vegetation along the perimeter of the course	<i>No Effect</i>	<i>No Adverse Effect.</i> Although selective tree clearing would occur along the perimeter to reduce encroachment and promote turf health, the native deciduous vegetation along the perimeter of the course would remain apparent. The integrity of design and materials would not be diminished.
Native deciduous vegetation between fairways throughout the course	<i>No Effect</i>	<i>No Adverse Effect.</i> Selective tree removal would occur along the fairways to widen the corridors as they were historically and to improve playability. Native deciduous trees would continue to divide the holes and line the fairways. The integrity of design and materials would not be diminished.

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Character-Defining Feature	Alternative 1: No Action	Alternative 2: NPS Preferred (Undertaking)
Row of red cedars ( <i>Juniperus virginiana</i> ) along road north of clubhouse	<i>No Effect</i>	<i>No Adverse Effect.</i> The existing line of eastern red cedars along the former farm road and fence line between holes 7 and 9 would be preserved. New red cedars would be planted to replace those trees that have died and to reestablish the continuous allée of trees at this location. The integrity of design and materials would not be diminished.
Red oak trees ( <i>Quercus rubra</i> ) surrounding clubhouse	<i>No Effect</i>	<i>No Adverse Effect.</i> A single identified red oak tree on the east side of the existing clubhouse would be retained. Two red maple trees in the vicinity of the clubhouse will be retained. The integrity of design and materials would not be diminished.
Magnolia ( <i>Magnolia grandiflora</i> ) tree west of clubhouse	<i>No Effect</i>	<i>No Adverse Effect.</i> The magnolia tree west of the current clubhouse would be retained. The integrity of design and materials would not be diminished.

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Character-Defining Feature	Alternative 1: No Action	Alternative 2: NPS Preferred (Undertaking)
<b>Views and Vistas</b>		
View between fairways and greens on holes throughout course	<i>No Effect</i>	<b>Adverse Effect.</b> The undertaking would alter and obstruct views between the historic greens and holes (original holes 9 and 10) with the construction of the proposed driving range structure, impacting the integrity of design. The effect would be minimized by the siting of the driving range structure within an existing basin. The natural topography, combined with the transparent nature of the structure, would minimize its visual impact on the landscape. The construction of the maintenance building and pavilion would not alter historic views. The widening of the fairways through the selective removal of trees and invasive species would restore historic views along the fairways that have been impacted by encroachment.
Picturesque views of natural landscape throughout the course	<i>No Effect</i>	<b>No Adverse Effect.</b> The picturesque views of the natural landscape of Rock Creek Park would remain intact throughout the course. The routing of the 9-hole regulation and 9-hole par-3 courses would reuse many of the historic corridors. The routing would continue to provide views of the open, relatively flat landscape (and former farmland) near the clubhouse and the steep, varying topography and dense vegetation in the north, east, and south, as well as along the perimeter of the course. The integrity of design and would not be diminished.
<b>Natural Systems and Features</b>		
Stream crossing fairway 17	<i>No Effect</i>	<b>No Adverse Effect.</b> The stream crossing at Fairway 17 would not be altered as part of the proposed undertaking and would be incorporated in the routing of the proposed Hole 8 of the 9-hole regulation course.

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### *Rock Creek Park Historic District*

The proposed undertaking would result in an adverse effect to the Rock Creek Park Historic District because of the demolition of the Mission 66 clubhouse, a contributing element to the historic district. The remaining proposed components of the undertaking would not contribute to the adverse effect as they would not alter character-defining features of Rock Creek Park or introduce visual elements that would impact the integrity and/or the overall historic setting of Rock Creek Park.

**Table 3. Assessment of Effects, Rock Creek Park Historic District**

Resource	Alternative A: No Action	Alternative B: NPS Preferred (Undertaking)
Rock Creek Park Historic District	No Effect	<b>Adverse Effect.</b> The Mission 66-era clubhouse would be demolished, impacting the district's integrity of design, materials, and workmanship. The adverse effect would be minimized through the design of the new clubhouse, which would consist of a contemporary design that is compatible with the historic massing and materials of buildings and structures in Rock Creek Park.

### *Archaeological Resources*

The J. Pilling Farm Site is the archeological remains of a nineteenth-century farm located in the northeastern part of the golf course. Based on Phase I archeological study, the site is considered potentially eligible for listing in the National Register. At a meeting held on March 9, 2023, involving the NPS, it was agreed that impacts to the site will be avoided by redesign of the improvements planned for this location, such as a new trail. There will be no site grading and no stump grinding or grubbing within the J. Pilling Farm Site. The existing cart path bisects the site and the new path will generally follow this previously disturbed alignment; during construction of the new path, fill soils will be used to encapsulate resources and prevent any physical impacts. This approach would avoid an adverse effect to this resource.

Two archeological sites had previously been recorded near the southwestern corner of the APE: Site 51NW166 and the Cowden Ravine Site, 51NW188. Both sites were recorded during the 2002-2006 SAIP Survey.<sup>11</sup> Site 51NW166 was a scatter of nineteenth-century artifacts found on sloping bluffs over Rock Creek. The existing boundary of the Cowden Ravine site extends into the current APE, although that

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<sup>11</sup> Stuart Fiedel, John Bedell, and Charles LeeDecker, *"Bold, Rocky, and Picturesque," Archeological Overview and Assessment and Identification and Evaluation Study of Rock Creek Park, District of Columbia* (Washington, DC: 2008).

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boundary appears to be rather large for what was actually reported, a small group of finds in the bottom of a ravine. The report states:

A pit was observed on the edge of this ravine, and the surrounding area was investigated with the metal detector. Two machine cut nails were recovered from a shovel test excavated at the rim of the pit. Metal detecting in the surrounding area produced no additional items.<sup>12</sup>

Both sites appear to be associated with the J. Hoyle Farm. The Cowden Ravine Site may be associated with a small structure shown in the bottom of the ravine on both the Hodasovich 1864 and 1892 USCGS Maps; it may have been a spring house. Site 51NW166 is likely trash spread down the hill from the house, which was on the hilltop above. During the recent Phase Ib archeological survey, several artifacts were found in the general vicinity of the J. Hoyle Farm. These finds may have derived from the J. Hoyle Farm, although they could also date to more recent times. However, most shovel tests in this area were negative, and two close-interval shovel tests failed to produce additional material. The center of the J. Hoyle Farm is outside the APE, and the artifacts within the APE do not represent potentially significant components. The projected location of the structure in the ravine is also not within the current APE.

At the time of the Phase Ib archeological survey, plans for rehabilitation of the golf course had not yet been finalized. When all the elements of the rehabilitation have been developed, including cart paths and utilities, final plans will be reviewed to determine if there are additional impact areas. If there will be impacts to unsurveyed areas, additional Phase Ib archeological survey will be carried out following the same methods used to date. So far, archeological resources have been encountered only where historic maps show nineteenth-century farms, so the likelihood of finding archeological sites in other areas is low.

## **Summary of Adverse Effect and Resolution Strategies**

### **Summary of Adverse Effect**

The proposed action alternative will result in no loss or diminishment of to the integrity of Location, Setting, Workmanship, Materials, Feeling, and Association of the Rock Creek Park Golf Course Cultural Landscape. Changes to the historic routing and design of the William Flynn golf from the construction of the 9-hole regulation course and the par-3 course and modifications to historic views from the construction of the new driving range/cart barn structure course will diminish the Rock Creek Park Golf Course's integrity of design. Therefore, the implementation of the proposed action alternative would result in an adverse effect to the Rock Creek Park Golf Course Cultural Landscape.

The demolition of the clubhouse will result in a complete loss of the building and would diminish the integrity of design, materials, and workmanship of the Rock Creek Park Golf

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<sup>12</sup> Fidel et al, *"Bold, Rocky, and Picturesque,"* Vol. II, 195.

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Course Cultural Landscape and the Rock Creek Park Historic District. Therefore, the implementation of the proposed action alternative would result in an adverse effect to the Rock Creek Park Golf Course Cultural Landscape and the Rock Creek Park Historic District.

Adverse effects to identified archeological sites would be avoided. Since plans for rehabilitation of the golf course had not yet been finalized at the time of the Phase Ib archeological survey, final plans will be reviewed to determine if there are additional impact areas when all elements of the rehabilitation have been developed. If there will be impacts to unsurveyed areas, additional Phase Ib archeological survey will be carried out following the same methods used to date.

### **Resolution of Adverse Effect**

The Section 106 consultation process is ongoing. NLT, NPS, DC SHPO, and the consulting parties have identified ways to avoid, minimize, and mitigate adverse effects to historic properties in the APE. NLT and NPS intend to pursue the negotiation and execution of an agreement document to resolve the Section 106 process according to 36 CFR 800.6(c). NLT and NPS will work with the DC SHPO and the consulting parties to identify mitigation measures to include in the agreement document.

The following avoidance and minimization strategies will be carried out as part of the rehabilitation effort:

- The varied topography of the course will remain intact through limited grading. The rolling hills of the historic front nine holes would be apparent around the vicinity of the clubhouse and holes 1–5 of the 9-hole regulation course. Holes 6–8 of the regulation course would incorporate the steep, dramatic hills characteristic of the historic back nine holes.
- The par-3 course would incorporate many of the historic corridors and the topographic character of Flynn's back nine holes.
- The proposed course routing would continue to be two 9-hole loops that begin and end at the clubhouse.
- Many of Flynn's original tees, greens, and fairways would be restored and incorporated into the proposed design.
- The proposed clubhouse, driving range, cart barn, and pavilion would be clustered in the location of the existing clubhouse and would not interrupt the spatial organization of the course.
- All existing, principal circulation patterns and access points would remain intact.
- The historic farm road and its *allée* would remain and would be incorporated into the trail design.

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- The design of the new clubhouse would consist of a contemporary design that is compatible with the historic massing and materials of buildings and structures in Rock Creek Park.

The contrast between the open, relatively treeless front nine and the denser, forested back nine would remain.

- Native deciduous vegetation around the perimeter and between the fairways would be maintained.
- The row of red cedars along the farm road will remain and be reestablished.
- The magnolia tree in the vicinity of the clubhouse would be retained.
- The red oak and red maple trees in the vicinity of the clubhouse would be retained.
- Visual impacts from the new driving range would be minimized by its location in an existing basin and the relatively transparent design of the structure.
- The widening of the fairways through the selective removal of trees and invasive species would restore historic views along the fairways that have been impacted by encroachment.
- The routing of the 9-hole regulation and 9-hole par-3 courses would reuse many of the historic corridors would continue to provide views of the open, relatively flat landscape near the clubhouse and the steep, varying topography and dense vegetation in the north, east, and south, as well as along the perimeter of the course.

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# 5.0 DOCUMENTATION OF SECTION 106 CONSULTATION

The National Park Service conducted public involvement during the Section 106 process to provide an opportunity for the public to comment on the proposed action. Consultation and coordination with federal and district agencies, American Indian tribes, and other interested parties were also conducted to identify issues and /or concerns related to natural and cultural resources. This section provides a brief summary of the public involvement and agency consultation and coordination that occurred during planning of the Rehabilitation of the Rock Creek Park Golf Course. Additional public involvement is anticipated as the National Park Service completes the Section 106 and National Environmental Policy Act (NEPA) processes.

## **Public Involvement**

As a part of the NEPA process, and to comply with the requirements of Section 106 of the National Historic Preservation Act, the National Park Service involved the public in project planning by conducting a public and agency scoping period from January 8, 2023, through February 9, 2023. The public, agencies, and stakeholders were invited to submit comments on the project during this time.

A virtual public meeting was held on January 26, 2023, to provide citizens the opportunity to:

- learn about the proposed Rock Creek Park Golf Course Rehabilitation Plan project;
- identify any areas of concern regarding the proposed project;
- share their knowledge of important environmental and cultural issues that should be considered during planning; and
- submit public feedback to help inform the development of project alternatives.

A consulting parties meeting was held on March 2, 2023, with the same objectives listed above. Additionally, potential adverse effects were presented at the meeting. Consulting parties were given the opportunity to submit comments on the proposed undertaking and potential adverse effects. No formal comments were received during the comment period.

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### **Agency Consultation and Coordination**

The National Park Service conducted several agency consultation and coordination activities during planning for the Rock Creek Golf Course Rehabilitation. Consultation and coordination included:

- A meeting with the staff of the DC Historic Preservation Office, Commission of Fine Arts, and the National Capital Planning Commission was held on July 18, 2022, to present conceptual alternatives and to identify potential issues and concerns. At this meeting, the agency staff encouraged the National Park Service to continue to consult on the project in the future and expressed interest in an organized site visit. The NPS and NLT followed up with a site visit with agency staff on September 7, 2022.
- The project received Commission of Fine Arts and NCPC concept approval in January 2023.
- An agency scoping meeting was held on January 25, 2023.

The following agencies and stakeholders were contacted to request input on the project:

- Absentee Shawnee Tribe of Indians of Oklahoma
- Advisory Neighborhood Commissions 3F03, 3G02, 4A07, and 4A08
- Catawba Indian Nation
- Chickahominy Indian Tribe
- Chickahominy Tribe Eastern Division
- Committee of 100 on the Federal City
- Cultural Landscape Foundation
- DC Council
- DC Department of Energy and Environment
- DC Department of Parks and Recreation
- DC Department of Transportation
- DC Historic Preservation Office
- DC History Center
- DC Preservation League
- DC Water
- Delaware Nation
- Delaware Tribe of Indians
- Eastern Shawnee Tribe of Oklahoma
- Monacan Indian Nation
- Nansemond Indian Nation
- National Capital Planning Commission
- National Trust for Historic Preservation
- Pamunkey Indian Tribe

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- Rappahannock Tribe
- Rock Creek Conservancy
- Shawnee Tribe
- Sixteenth Neighborhood Association
- Sixteenth Street Heights Civic Association
- Upper Mattaponi Indian Tribe
- US Commission of Fine Arts
- US Fish and Wildlife Service

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