



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Chesapeake Bay Field Office
177 Admiral Cochrane Drive
Annapolis, Maryland 21401
<http://www.fws.gov/chesapeakebay>

November 26, 2024

Brian Joyner
Rock Creek Park Superintendent
3545 Williamsburg Lane NW
Washington, DC 20008

RE: Rock Creek Park Golf Course Rehabilitation Project

Dear Mr. Joyner:

The U.S. Fish and Wildlife Service (Service) has reviewed your project. The comments provided below are in accordance with Section 7 of the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*).

Background

The purpose of this rehabilitation project 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 has been proposed by National Links Trust, a 501(c)(3) nonprofit that has held a 50-year lease from the National Park Service (NPS) to operate Rock Creek Park Golf Course since 2020. The project is subject to NPS approval. The NPS, in coordination with National Links Trust, developed a plan and environmental assessment that analyzed the impacts of improving the Rock Creek Park Golf Course.

The NPS and National Links Trust will remove up to 1,291 trees over two phases. Of this total, 445 were determined to be in poor health or already dead, and nearly 200 are non-native, invasive species that pose a threat to native plant species. To mitigate for these tree removals, approximately 1,500 to 2,400 native species trees would be planted on the course. Also, meadows would be rehabilitated or added throughout the golf course.

The project will be conducted in the following phases:

- Phase 1
 - The removal of 1,069 trees.
 - Demolition and replacement of the existing buildings, construction of new buildings, and modifications to existing developed lands.
 - Addition of lighting for nighttime use in limited and specific areas of the clubhouse and driving range with a limited schedule of use.
 - Construction of a practice putting green and short game area.

- Phase 2
 - The removal of up to 222 trees.

- Rehabilitation of the 18-hole golf course
- Repair and replacement of water distribution and irrigation system.
- Addition of new cart path and nature trail.
- Establishment of 12.3 acres of meadow habitat on abandoned golf course holes and throughout the golf course.
- Plant 1,500 to 2,400 native trees over 7.1 acres.

NPS has identified individual trees to be removed and less than 6 acres of tree removal in the main section of Rock Creek Park (US Reservation 339), which contains 1,420 acres of forest. There are substantial forest areas in Glover Archbold, Fort Totten, and the other Civil War Defenses of Washington not included in this acreage.

The federally endangered northern long-eared bat (*Myotis septentrionalis*) and the Hay's Spring amphipod (*Stygobromus hayi*); the federally proposed endangered tricolored bat (*Perimyotis subflavus*); and candidate species monarch butterfly (*Danaus plexippus*) may occur in the proposed project area.

The Endangered Species Act does not require conferencing on species proposed to be listed or candidate species unless the action is likely to jeopardize the continued existence of the species. Therefore, our conclusions regarding tricolored bat and monarch butterfly shall serve as our conference concurrence.

Conclusions

We concur that this project “may affect but is not likely to adversely affect” northern long-eared bat and Hay's Spring amphipod. We conclude that any adverse effects to the proposed endangered tricolored bat from this project would be temporary and discountable. We conclude that any adverse effects to the candidate monarch butterfly from this project would be temporary and discountable and creation of habitat included in the project will benefit the species.

Rationale

Northern Long-eared and Tricolored Bats

This project will result in tree clearing. NPS estimates that less than 6 acres of trees will be removed (<0.4 percent of the total forested land in Reservation 339). The footprint of where trees will be removed is approximately 28 acres (2 percent of the total forested land in Reservation 339). In making our determination, the Service considered the functional habitat loss within that footprint.

We note that habitat that is currently in use or likely to be used, is likely far less than the footprint acreage because:

1. Several portions of the project footprint forest are experiencing significant edge effects, such as curtains of vines. These edge effects can impact the forest function and ability of the bats to use these areas.
2. Several portions of the project footprint are themselves forest fragments or loose aggregates of trees. Therefore, these bats, particularly the northern long-eared bat, may not select for these areas over other habitat available to them.

The trees being removed are along an edge of Reservation 339. The project footprint contains large amounts of forest edge habitat, and in some cases, they are already fragmented from the larger forest stands surrounding the golf course. Therefore, the project is not fragmenting the larger forest stand. Additionally, the remaining forest in Reservation 339 contains quality forest habitat, including the forest adjacent to the project footprint.

Furthermore, the Service assessed the proposed lighting and sound associated with this project. No golfing holes will be lit. The proposed driving range lighting solution will have a small footprint that will not extend beyond areas of loose aggregates of trees. The proposal includes tree planting that will further reduce light collusion beyond the driving range area. The proposed expansion of the golf course club restaurant and driving range will provide additional lighting and noise to areas which we have already included in our calculation of maximum functional habitat loss. Therefore, lighting and sound will not result in additional habitat loss to bat species beyond what was already accounted for.

NPS will implement the following conservation measures:

- NPS will cut and clear the trees outside of bats' summer occupancy period. This time of year restriction will avoid direct impacts to bats during their vulnerable reproductive period.
- This project will plant trees that will, over the long term, reconnect two areas with the larger forest fragment, potentially replacing several acres of removed habitat.
- NPS will minimize lighting.
- This project will include native meadow planting in areas adjacent to the forest, providing foraging habitat.

Hay's Spring Amphipod

The Hay's Spring amphipod is known to occur in springs adjacent to the golf course. However, based on the current scope of work, no impacts are anticipated to these existing populations, as the catchment and buffer areas supporting these known springs are outside of the limits of disturbance for this project. We recommend the use of best management practices for erosion and sediment control as well as stormwater management measures to help to mitigate any potential impacts to water and groundwater quality within the park. Specifically, near the 11th hole tee box, we recommend that extensive silt fencing be used during construction, and a retaining wall installed to prevent fill from extending past the project boundaries.

There is no evidence to suggest that springs supporting the species exist on the golf course or within the areas proposed for tree removal. There are few areas with the forest cover and elevation characteristics needed to support amphipod habitat within the project area. Additionally, according to Pesticide Use Proposal records provided by NPS, numerous pesticides and herbicides are used on the golf course, likely reducing water quality in this area. Potential habitat (forested stream channel and headwater area) within the project area was assessed by staff from the Service and the District Department of Energy and Environment this fall. No spring or seep habitat was found. Potential habitat was found outside of the project boundary, in an area where no construction, tree clearing, or other impacts will occur.

Monarch Butterfly

There are no known milkweed plants within the project area. We appreciate that NPS plans to revegetate with native plant species and will develop native meadows. We encourage NPS to increase monarch butterfly habitat within the project area's revegetated areas and stormwater features to the maximum extent practicable. Changes in species status under the Endangered Species Act would require additional Service consultation and may result in new guidance.

Finally, we encourage NPS to maximize use of wildlife-friendly construction standards in the development of new structures to minimize bird collisions with windows and impacts of nighttime lighting. The General Services Administration has guidance for bird-safe building design, and we are available to provide technical assistance.

We appreciate the opportunity to comment on this project. If you would like to further discuss our suggested conservation measures, please contact Sabrina Deeley of my staff at sabrina_deeley@fws.gov.

Sincerely,

Genevieve LaRouche
Field Supervisor