



Rock Creek Conservancy (the Conservancy) is pleased to comment on the Rock Creek Park Golf Course Rehabilitation Environmental Assessment (EA) (September 2023). The National Park Service (NPS) prepared the EA in coordination with the National Links Trust (NLT), the long-term lessee of the Rock Creek golf course. The Conservancy is excited about the prospect of a rehabilitated golf course that will enhance the experience of park visitors, including both golfers and non-golfers, as well as community members by improving their experiences in Rock Creek Park. Further, the project will protect a valuable cultural landscape within Rock Creek Park (ROCR).

Rock Creek Conservancy is a philanthropic and stewardship partner to the National Park Service and a watershed organization that serves as the voice for Rock Creek. Since 2005, it has engaged more than 40,000 community members in people-powered restoration and has been working on a forest resilience framework for Rock Creek Park in partnership with the National Park Service.

Broadly, this project seems like a positive development for Rock Creek Park: it offers a partnership that alleviates ROCR's deferred maintenance and operating budget; expands non-motorized visitor access to ROCR from the 16th Street side; and offers more equitable recreational opportunities for both golfers non-golfers; protects a cultural landscape; and creates significant meadow habitat, a habitat type underrepresented in ROCR. The Conservancy recognizes the value of public-private partnerships to allow the ideals of ROCR, as established by Congress in 1890, to be pragmatically applied to realities of the 21st century, including visitor expectations, the impacts of climate change, and the limited options on land around ROCR to provide for recreation and resource protection.



As noted in the ROCR Resource Stewardship Strategy, ‘revitalization of existing buildings and designed landscape could greatly enhance use and enjoyment of Rock Creek Park,’ (p.22). In the same document, the golf course is also noted as the largest artificial terrestrial habitat. The proposed alternative will undoubtedly improve the integrity of the golf course as a cultural landscape, but is to some degree at odds with the protection of terrestrial resources on the site.

While the Conservancy supports golf course rehabilitation, the environmental effects of the EA’s Preferred Alternative are not well documented or supported. The more detailed analyses mentioned throughout the document should be included and the FONSI should have quantitative goals or metrics for evaluating ongoing implementation.

Purpose and Need

The EA describes the project’s purpose as to ‘address the deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial sustainability for the operation of the Rock Creek Golf Course.’ This purpose verges on such specificity that it seems that there is almost no alternative that could satisfy it other than the proposed action.

For example, the location of the maintenance facility is relocated to an area that will increase tree clearing and grading activities, in order to situate the structure where it is not visible to most golfers playing on the course.

Similarly, the clubhouse is proposed to be replaced, rather than restored, because it ‘does not meet the program needs for the project’ (p. 30). A much larger new building would be less expensive than moving internal walls and making the existing building compatible with modern accessibility codes.



Recommendation: Rock Creek Conservancy recommends creating additional alternatives that reduce potential environmental effects and subjecting them to the same analysis as the proposed alternative in the draft EA. These might include:

- Constructing only a 9 hole course at the top of the hill, the driving range, the club house, and trail. The back 9 holes could be left as is (i.e. no trees or only hazard trees removed), converted to meadow, or reforested, thus significantly limiting tree removal.
- Replacing the clubhouse with an upgraded structure with the non-golfing amenities mentioned and constructing the driving range, and leaving the rest of the course as noted above.
- Continuing with the same proposed project, with significant offsite mitigation of tree loss

Scope of the EA

We notice that NPS and NLT have issued the EA only for rehabilitation of the Rock Creek golf course even though the NLT long-term lease covers all three NPS golf courses in the District. The others are at Langston and East Potomac Park. NPS should explain why it chose to analyze the environmental impacts of only one of the golf course rehabilitation projects.

Specificity of the EA

Through the assessment, many detailed analyses are referred to but not included or provided in links. For example, the section on tree loss refers to inventories of trees completed by Coastal Resources in 2022; these are not included.



Recommendations:

- All invasive plant management specified in the proposed alternative should be monitored and required to meet NPS standards of less than 5% cover after 2 years of management, as well as other criteria consistent with the National Capital Region Invasive Plant Management Plan.
- The proposed well should have specific criteria provided in the FONSI for its consideration.
- The FONSI should establish benchmarks by which affordable play will be evaluated regularly.

Forest Resilience

Fundamentally, preserving a golf course as a cultural landscape is at odds with the need for forest protections in ROCR. The park's Resource Stewardship Strategy outlines priorities, including protection of the upper canopy ecological community through nonnative invasive plant control, pest management, and afforestation, as well as protection and restoration of the understory and herbaceous layer through similar activities.

Over the last year, the Conservancy has worked with ROCR and other NPS staff to develop a forest resilience framework, which provides strategies to restore and manage the park's forested landscapes. Just as the forest resilience strategy would not suggest removing a valuable cultural resource to make way for forests, a cultural landscape protection project should not come at the expense of forest protections.

A key strategy of the framework is to increase interior habitat areas (with at least 100 meters from any fragmenting feature, such as road or trail) within forest blocks in the park. To that end, the golf course does not offer significant loss of interior habitat and, as noted in the EA, the trees to be removed are generally in forested areas of poor condition. The loss of healthy trees is explained by the cultural landscape protection imperative to restore the historic design of the golf course.



Analyzing the impacts of the proposed alternative would be significantly easier if other alternatives had been created and/or retained for analysis. For example, if the back 9 are not redeveloped, stands A and B, which represent 19 of about 24 forested acres in question, would be largely untouched in terms of tree removal. The flip side of this is that such an alternative would likely yield little invasive plant control in that area, so the retained forest would continue to degrade absent other intervention.

Whether or not the loss of trees is *required* for the preservation of the cultural landscape, ROCR could *elect* to restore forests in other parts of the park, consistent with the forthcoming forest resilience framework, to offset some of the loss of trees on site. This could be done through a series of plantings as light gaps emerge in priority forest areas, notably the area just south of Military Road, relatively proximate to the golf course location. This would address some of the environmental trends included in the EA, notably climate change, by reducing loss of a carbon sink. In fact, afforestation to replace forests in poor condition may have an overall positive benefit to the ROCR environment, as a healthy forest has greater benefits than a degraded one.

Meadows

The addition of meadow habitat, which is underrepresented in ROCR, is commended and consistent with the park's Resource Stewardship Strategy and should be retained even if forests are added offsite.

The Conservancy agrees that having more meadow habitats is good for wildlife and invertebrate diversity. Recognizing that effective meadow management must be adaptive in nature, the FONSI should establish critical benchmarks for the condition of the meadows such as percent cover by invasives or establishment rates of native plants.



Water, Wetlands, and the proposed Well

Wetlands are scarce habitats in ROCR. The ones that are present support a diverse array of vertebrates (like frogs, toads, and salamanders) and invertebrates, including the endangered Hay's spring amphipod. The NPS/NLT proposal to evaluate using groundwater to augment irrigation water for the golf course must include an assessment of how groundwater removal would affect groundwater and wetlands both on the golf course and in Rock Creek stream valley beyond the boundaries of the golf course rehabilitation.

The Conservancy applauds the NPS/NLT proposal to capture stormwater and rainfall in cisterns and a pond for irrigating the golf course. The EA lacks quantitative information on how much water will be needed for irrigation of the golf course under different rainfall patterns. Several years ago, the Washington area had a very wet year. Yet in 2023, the area is 7 – 9 inches below normal. Much of the rain we now get comes in torrential episodes. Do NPS/NLT have quantitative information about how much water will be needed and where NLT would get it during different rainfall patterns? Providing such information will be essential to predict potential impacts of the proposed project on ROCR wetlands. NPS should delay issuing the FONSI until NLT completes its hydrologic evaluation and presents this analysis so that the FONSI can include specific benchmarks under which a well might be constructed and used.



Wildlife

The discussion of “Wildlife and Habitat Management” in the EA mentions wild turkeys and coyotes as being present in ROCR. It does not mention that both species breed/roost in the wooded areas of the golf course. These are some of the only places in DC where these species breed and thrive because of the brush in the wooded areas between the fairways of the golf course. Granted, much of the ground cover is invasive vegetation. The EA states that “Wildlife may avoid areas of construction/tree removal and *could be expected* (emphasis added) to return to these habitats once construction/tree removal is complete.” This overly broad characterization serves to downplay potential effects to wildlife. If species require trees and ground cover for nesting, roosting, raising young and the trees and brush are gone, the species will not return. If NPS/NLT removes suitable habitat for species like raccoons, foxes, and coyotes, they will push them to find suitable habitat elsewhere in ROCR or in neighbors’ yards.

Wood frogs inhabit the vernal pool in the northwestern section of the golf course. Have they been observed breeding elsewhere in ROCR? If not, this vernal pool would seem to be an important resource. Aren’t there also vernal pools and seeps just outside the boundaries of the golf course that could be adversely affected by water withdrawal up the hill from the pools? Hay’s spring amphipods rely on seeps and wetlands. Even though none have been found on the golf course itself, there are seeps and wetlands that may provide suitable habitat for them at the base of the hill in Rock Creek valley just below the golf course. Any removal of groundwater from a deep well could affect these downhill seeps. If so, NPS/NLT should analyze the effects of groundwater removal on those pools before issuing the FONSI.



Environmental Justice, Access, and Inclusion

The Conservancy applauds the NPS/NLT proposal to build a “nature trail” around the perimeter of the golf course and improve pedestrian and cyclist access to the golf course along Joyce Road. A nature trail could be a popular resource for non-golfers. Many people enjoy walking in the park, especially on Beach Drive now that traffic is restricted there. The proposed nature trail provides another rich amenity for the east side of the park, which has less than half the number of non-automotive entrances to ROCR as does the west side.

ROCR should consider extending the multi-use trail along Joyce Drive all the way to Beach Drive to further expand equitable access to ROCR. This would also make possible access to clubhouse amenities (restrooms and cafe) by those using Beach Drive for recreation and may serve to limit creation of social trails to cut through from Beach Drive and/or the Valley Trail to the clubhouse or nature trail.

Environmental justice impacts were dismissed from further analysis (pp 9 -10) due in part to a commitment from NLT to ‘keep play affordable,’ a laudable goal consistent with Rock Creek Park as a public park with no entrance fee. The EA notes three approaches that NLT will take to accomplish this, which seem reasonable, but provide no metrics to determine whether the goal has been met. It is understood that, over the course of 50 years of operation, the specific tactics used to accomplish the goal are likely to shift, thus having goals for affordability and inclusion seem most reasonable.



Conclusion

Rock Creek Conservancy supports rehabilitation of the Rock Creek Golf Course and the long-term lease with National Links Trust in a manner that minimizes adverse effects on the natural habitats that exist on the golf course. We also understand and support the need to balance preserving the historic and cultural aspects of the golf course while protecting its natural amenities which have evolved and changed as part of the natural process.

As noted above, the Conservancy recommends amending the EA that includes at least one additional substantive alternative. These might include restoring only 9 of the 18 holes, just replacing the clubhouse, or the proposed alternative with significant afforestation as mitigation.

The Conservancy looks forward to continuing our work with NPS and NLT as the project moves forward. Please contact me if you have any questions about our comments.