



Comments submitted to the National Park Service

In response to the Upper Beach Drive Management Plan Environmental Assessment released in July 2022
August 9, 2022

Thank you for the opportunity for Rock Creek Conservancy to submit comments on the Upper Beach Drive Management Plan Environmental Assessment (EA). As noted in our support last summer, Rock Creek Conservancy **strongly supported Concept 2, “Full Closure for Recreation,” which was evaluated in the EA as Alternative 2.**

The decision about how to manage Beach Drive is one not just of park management, but ties to a fundamental question about who we are and what we value as a community, as a region, and as a nation. The pandemic and this public process have created a rare opportunity to rethink and focus on those issues. As the nation’s first urban national park, Rock Creek Park can and should be a leader in this regard, charting the way for the next century of first-class park management and holding this urban oasis in trust for all Americans.

Rock Creek Park was established by Congress in 1890 to preserve the “natural, archaeological, and historic resources of the Rock Creek Valley ... while providing visitors with compatible recreational opportunities and a respite within the nation’s capital¹.”

Using Beach Drive as a commuting thoroughfare is not a “compatible recreational opportunity.” In fact, the park’s foundation document does not include Beach Drive in its significance statements, as it does for the Rock Creek and Potomac Parkway for its distinctive design. The park’s enabling legislation does not specify commuting or through-traffic as a purpose of the system of roadways and bridlepaths; scenic driving and horseback riding are included². Over time, an accumulation of management decisions has created conditions out of alignment with the park’s intent. This environmental assessment is a critical opportunity to restore that balance.

A series of management decisions by the governments of jurisdictions surrounding the park have also led to the deterioration of conditions in the park. The Conservancy believes that the natural benefits of the park should extend to the communities around it. This cannot be accomplished if the park is used to offset stormwater, sewage overflows, and excess traffic from the city around it.

Rock Creek Conservancy’s mission is to restore Rock Creek and its parklands as a natural oasis for all people to appreciate and protect. Therefore, **we continue to endorse the approach outlined as Alternative 2: Full-Time Closure for Recreation and strongly suggest the National Park Service change its**

¹ Foundation Document Overview: Rock Creek Park. Accessed via <http://npshistory.com/publications/foundation-documents/rocr-fd-overview.pdf>

² Mackintosh, Barry. (1985) Rock Creek Park: An Administrative History. National Park Service, Washington, DC. Accessed via <https://www.nps.gov/rocr/learn/historyculture/adhiah.htm>



recommended preferred alternative. The Conservancy will gladly support mitigation needed to make this alternative more feasible now.

If NPS continues to recommend Alternative 3, Rock Creek Conservancy offers a number of recommendations to strengthen implementation, including transparency and accountability with its adaptive management approaches; traffic mitigation strategies to improve safety of park visitors; and a suite of strategies to mitigate impacts on the park's forests.

Rationale for Alternative 2

As noted above, Alternative 2, Full-Time Closure for Recreation, offers a unique opportunity to transform Rock Creek Park for current and future generations. Further, the Conservancy believes that the impacts that are outlined in the EA as necessitating seasonal closure could be effectively mitigated in other ways.

One impact retained for detailed analysis is the impact of increased visitation on wildlife and their habitat, including "incursions of persons on foot into natural areas that previously were not easily reached because of the presence of motor vehicle traffic."

Rock Creek Conservancy has great regard for the professional staff of Rock Creek Park and other National Park Service units and programs that informed the environmental assessment, and recognizes the significant financial and operational challenges that constrain staff's ability to execute their work to the fullest. While much public rhetoric has focused on questioning the expert wisdom that arrived at the conclusion that negative visitor impacts to wildlife habitat such as social trails, dogs off leash, and disruptions to woody debris on the forest floor would be "expected to continue under this [Alternative 2, full-time closure for recreation] alternative," (p27), the Conservancy prefers to focus on opportunities to mitigate this impact.

During the public meeting about the EA on July 18, Superintendent Washburn referenced in her comments a "long-term forest management plan," (1:27³). Since the publication of the environmental assessment, Rock Creek Conservancy has secured sufficient philanthropic funding to launch the Rock Creek Resilience project. This initiative, planned in partnership with Rock Creek Park, will start with a year-long effort to develop a landscape-scale plan to restore and maintain the forests to protect the natural resources and increase equity of access to their ecosystem services while engaging community members in people-powered restoration to sustain this restoration beyond park borders. **The Rock Creek Resilience project and related forest health efforts should provide a trail map to reduce social trails and promote healthy forests in late 2023.**

One year is a short period of time in relation to the 132-year history of the park and the hundreds of years of park protection yet to come. If more immediate mitigation is desired, snowfencing⁴ could be placed along the edge of Beach Drive with additional signage to discourage visitors on the road from

³ Video recording linked at <https://parkplanning.nps.gov/document.cfm?parkID=198&projectID=102800&documentID=121986>

⁴ Pricing for 4 miles of snowfencing and approximately 2,600 posts were priced at a major home improvement store in July 2022. The Conservancy could engage volunteers to support installation of the fencing.



creating or using social trails in the forest. The Conservancy estimates retail costs of supplies under \$25,000 and would gladly organize volunteers to install such fencing along the closed sections of the road.

Additional programmatic efforts of the Conservancy (or joint efforts with Rock Creek Park) currently provide additional mitigation of visitor impacts. During the July 18 public meeting about the EA, Superintendent Julia Washburn referred (1:25 in transcript⁵) to the Recreate Responsibly program that the Conservancy has implemented in partnership with ROCR, and recognized some of the limitations of such a positive social marketing strategy. Data collected in the course of recreational use surveys in summer 2020 showed a significant decline in visitors using the creek after Recreate Responsibly signs indicating water quality issues were posted near popular creek entrances⁶. **Rock Creek Conservancy will continue to provide Recreate Responsibly signs** to ROCR upon request and will continue the related social media and community education campaign. To date, the Conservancy has provided 400 signs to the park.

Rock Creek Conservancy has also provided a sign at the head of the Pine Trail (near the corner of Holly and 16th Streets NW) and has provided funding for similar signs at each of the trail heads along the eastern edge of the main body of the park (Reservation 339). Contracting issues at NPS have delayed the use of these philanthropic funds, which would be matched by NPS Centennial Challenge funds. These signs are similar in content and style to the park brochures that visitors are provided at fee stations in most national parks. Because ROCR is a fee-free park and has so many connections to nearby neighborhoods, park entrances are not staffed by rangers and do not have maps and regulatory information available to park visitors. The addition of these signs will serve to better educate park visitors about the official trails of the park, and will be further enhanced by complementary signs that will mark trail junctions or terms. **Once these signs are installed, visitors will be able to avoid unofficial trails, because only official trails will have a marker.**

In combination, these efforts create a more effective mitigation strategy for the visitor impacts described in the assessment that is much more appropriate for a national park than using automobile traffic as a deterrent.

Transportation Operations and Safety

Another impact retained for detailed analysis is the “potential for the project to impact transportation operations and safety,” noting that “partial or full closure ... would hinder local and regional traffic flow, particularly for commuters who use the roadway as a north-south connection to access downtown and other area of Washington, DC by car,” (EA, p. 7).

As noted in the 1990 Rock Creek Park Historic Resource Study⁷, “the road network was a popular addition to the park because it opened the valley to scenic carriage and automobile rides in most seasons,” (p.

⁵ Video recording in list at <https://parkplanning.nps.gov/document.cfm?parkID=198&projectID=102800&documentID=121986>

⁶ DC Citizen Science Water Quality Monitoring Report, p. 19 https://www.anacostiariverkeeper.org/wp-content/uploads/2022/03/ARK-VWQM-2020-Report_Final.pdf

⁷ Bushong, William. (1990) Rock Creek Park Historic Resource Study. Accessed at https://www.nps.gov/parkhistory/online_books/rocr1/hrs.pdf



105). The park’s general management plan⁸ notes that “Rock Creek Park supports more than 2 million recreational visits and more than 9 million non-recreational visits annually. Non-recreational visits primarily involve the use of park roads to travel between destinations outside the park.” The EA assumes a commuter function to the roadway in question, despite that being at odds with the park. **Thus, this flawed assumption requires reassessment of this particular impact.** Alternative 2 is a bit of a misnomer; the road is closed only to through traffic, not to all traffic. Scenic driving is possible on portions of Beach Drive, and a number of other roads in the park offer additional driving opportunities.

During the public meeting, scenic driving on Upper Beach Drive was noted as important to communities with limited mobility. The park should explore additional ways to promote more universal accessibility of the experience of the road through creative techniques such as golf cart tours or limited monthly ‘Sunday driving’ hours for those interested.

Further, the traffic study on which the EA seems to rest (dated June 2022⁹, uploaded to the NPS PEPC site on July 22, 2022) suggests that the District Department of Transportation views Rock Creek Park as an outlet for excess traffic volume from District streets. **Management decisions by District of Columbia agencies should not assume any additional capacity of the roads in Rock Creek Park to support any excess traffic volume.** Although projects such as the 16th Street Bus Lane, Connecticut Avenue Alternative C, and the pipeline bus project along Georgia Avenue¹⁰, are laudable for the way they advance VisionZero safety improvements and reductions in greenhouse gas emissions by the District, in line with the SustainableDC 2.0 plan, they may not be quite as positive as they appear if they simply displace cars to a national park, rather than shifting automobile drivers to alternative modes of transportation.

The park and the city around it exist in relation, not in isolation. The National Park Service and the District government must work together effectively to find ways to allow the city to thrive while protecting Rock Creek Park as a “green oasis¹¹” that is “perpetually dedicated to and set apart as a public park for the benefit and enjoyment of the people of the United States...in [as] natural condition as possible.¹²” Many times each year when it rains, huge flushes of the District’s stormwater scour Rock Creek and its tributaries, damaging wildlife habitat, reducing water quality, and threatening the surrounding forests. Also, many of the recreational users who are noted as creating impacts within Rock Creek Park are there because District development has surged beyond the capacity of neighborhood playgrounds and dog parks.

To uphold the park’s purpose, and to ensure the District continues to realize benefits from the park’s quality of life and ecosystem benefits, the problems of local traffic capacity should not interfere with

⁸ Rock Creek Park General Management Plan. Accessed via <https://www.nps.gov/rocr/learn/management/rock-creek-park-general-management-plan.htm>

⁹ Upper Beach Drive Traffic Management Plan, June 2022. Accessed via https://ddot.dc.gov/sites/default/files/dc/sites/ddot/Upper-Beach-Dr-Closure_Traffic-Analysis-Report_June21_2022_FINAL_508_v3.pdf

¹⁰ ibid

¹¹ Foundation Document Overview: Rock Creek Park. Accessed via <http://npshistory.com/publications/foundation-documents/rocr-fd-overview.pdf>

¹² The Rock Creek Park Authorization, Fifty-first Congress, session I, Chapter 1001. 1890. Accessed via <https://www.nps.gov/rocr/learn/historyculture/adhiah.htm>



providing transformational recreational access and resource protection in America's first urban national park.

Regardless of which alternative is selected, DDOT must quickly implement the traffic mitigation strategies outlines on pages 43 - 36 of the June 2022 traffic study to manage any impacts on the areas surrounding the park. The Conservancy also calls on the District Council's Transportation and Environment Committee to hold DDOT accountable for managing any impacts and improving the aforementioned projects to limit their impacts on the park.

If Alternative 3 is Selected

If NPS ultimately chooses to proceed with Alternative 3: Seasonal Closure for Recreation, the Conservancy suggests that **the adaptive management approach mentioned in the EA be conducted in a transparent and timely manner**. Alternative 3 is described as allowing "the superintendent [to alter] the management of upper Beach Drive in the future, based on changes to the condition of park resources and visitor management," (p. 14). Park managers should define how they will monitor conditions in and around the park to determine when additional recreational access can be granted. The park should set, in a finding of no significant impacts, an annual or semi-annual date to report on progress toward conditions that would allow for additional recreational access and define additional mitigation needed to reach such a point.

Further, if Alternative 3 is selected, NPS must offer more safety measures to protect pedestrians and cyclists in the park along Beach Drive, such as those referenced in the Rock Creek Park General Management Plan, such as physical traffic calming measures and increased speed limit enforcement. Additional measures such as lower speed limits and separation of cycle and auto traffic should also be considered.

This environmental assessment offers a singular opportunity to recalibrate Rock Creek Park's place as a standard-bearer for our nation's national park system.