

Comments submitted to the National Park Service

In public scoping phase of the Environmental Assessment regarding Upper Beach Drive

July 23, 2021

Thank you for the opportunity for Rock Creek Conservancy to submit comments on the future of upper Beach Drive in Rock Creek Park. Rock Creek Conservancy strongly supports Concept 2, "Full Closure for Recreation."

This question is not just one of park management, but a fundamental question about who we are and what we value as a community, as a region, and as a nation. We have 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 capital<sup>1</sup>."

Using Beach Drive as a commuting thoroughfare is not a 'compatible recreational opportunity.' In fact, the park's foundation documents do not include Beach Drive in its significance statements, in contrast to the Rock Creek and Potomac Parkway. The park's enabling legislation does not specify through traffic as a part of the system of roadways and bridlepaths mentioned for driving and horseback riding<sup>2</sup>. 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.

### Concept Development

Before commenting on the areas of impact to be considered, the Conservancy offers this input regarding the concepts themselves. Concept 2 is referred to in National Park Service (NPS) planning documents as "full closure," yet does allow for cross traffic and short segments of auto usage of Beach Drive to access picnic groves or to move between cross streets.

In addition, the Conservancy recommends adding a third alternative, which would propose the entirety of Beach Drive, from the zoo tunnel to Boundary Bridge, with traffic fully restricted. This concept, which might more properly provide a more accurate comparison with a no action alternative, could be given the "Full Closure" name, and Concept 2 renamed a more appropriate title, such as "Partial Closure to Through Auto Traffic,"

### Impacts

As Rock Creek Park continues to develop the concepts into management strategies for upper Beach Drive, the Conservancy offers these reflections on each area of impact to be analyzed.

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

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

## Visitor Use and Experience

- **Access and Accessibility** – The Conservancy has heard from many community members with mobility impairments who express enthusiasm for the wide, relatively flat surface offered on Beach Drive. Having more than four miles of closed road on which to recreate under a dense tree canopy offers a rare recreational opportunity for this group, including access via that road to a number of picnic groves, historic or natural resources, and other amenities. One related consideration is ensuring sufficient parking for those with disability placards. Replacing some general purpose spots or claiming a bit of road space for more spots might allow for such access.
- **Traffic Impacts** – It was clear, in the June 29 meeting hosted by Congresswoman Eleanor Holmes Norton, that the District Department of Transportation is ready and able to manage any traffic impacts that may result from the selection of Concept 2, a concern raised by some park neighbors. The Conservancy appreciates the agency’s cooperation and commitment to safety in our neighborhoods. Further, some current projects, such as the Oregon Avenue reconstruction, which are exacerbating the situation in some neighborhoods, are short-term in nature.
- **Visitor Safety** – The Conservancy has heard from numerous pedestrians, cyclists, and other recreational users of upper Beach Drive who are thrilled to be able to use this section without fear of cars whizzing by. Boulder Bridge, in particular, is a point of concern for pre-pandemic, non-auto road users, as there is no way to step onto ground alongside the road. The National Park Service has said adding a multi-use trail to this section of the park is not possible; for that reason, visitor safety should be prioritized by selecting Concept 2.
- **Availability of Recreational Opportunities** – Although Rock Creek Park has a wide variety of recreational opportunities, including miles of trail, few of these trails are accessible in the ways that Beach Drive is. Further, the city as a whole may offer a relatively large number of park opportunities, but only Rock Creek offers relatively intact forested parklands for recreation. In addition, these parks are not equitably accessible to all community members. As we have seen through the pandemic, upper Beach Drive offers a unique playspace for locals who may not have a backyard or who live in one of the areas with limited park access, including the area east of reservation 339<sup>3</sup>. Concept 2 makes two park picnic groves unavailable to automobiles, which could be viewed as a negative impact – or the addition of a new type of recreational opportunity. The drive itself offers a suite of new or expanded recreational opportunities, including nature interpretation (easier to hear, less noise to scare wildlife), human-powered recreation, nature center style programming, and more.

Historic Districts – The main body of Rock Creek Park is an important part of the historic district of Rock Creek<sup>4</sup>. While the foundation documents and National Register entry refer to the park’s circulation system as adding a “distinctive layered historic character to the park,” Beach Drive is not specifically listed as a contributing feature in the same way many of the bridges along the road are. It is, in fact, most often referenced as the location of other historic features, which will be greatly appreciated by passerby moving at a human, rather than auto, speed. The register nomination also notes that, “The road network was a popular addition to the park because it opened the valley to scenic carriage and automobile rides in most seasons, particularly south of Military Road. Road conditions on the unpaved roads in the northern

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<sup>3</sup> Trust for Public Land ParkScore Index. Accessed via <https://www.tpl.org/city/washington-district-columbia>.

<sup>4</sup> <https://planning.dc.gov/sites/default/files/dc/sites/op/publication/attachments/Rock%20Creek%20Park%20HD%20nom.pdf>

section required the thoroughfares be closed during inclement winter months,” (p. 87). This different, more recreational use of upper Beach Drive, continues today in the lower number of cars using that section (pre-pandemic) than in lower Beach Drive and Rock Creek Parkway.

The notion of scenic auto driving as part of the historic, if not original, fabric of the park could be maintained with occasional days during which the gates are opened for scenic tours or even more regularly through a motorized, but slower and safer conveyance such as a small tram, permitted by the National Park Service and operated as the principal mode of transportation on the auto-free portions of Zion National Park.

In fact, the 1902 McMillan Plan for DC’s parks noted the need to avoid at all costs impairments to Beach Drive as the park considers management strategies:

Narrow as the present road is, and skillfully as it was built, there are several points where it has very appreciably injured the scenery, and to widen it by any considerable amount would be a calamity. It is true that the value of the park scenery depends absolutely on making it conveniently accessible to the people, but nothing can be gained if the means of access destroys the scenery which it is meant to exhibit, and we believe that as wide a road as the future population is likely to demand would injure the character of the valley irremediably. Possibly the solution is to be found in the ultimate construction of another and wilder drive, or drives, high enough on the valley sides to leave the wild sylvan character of the stream at the bottom of the gorge uninjured, but yet within site [sic] and sound of the water and seeming to be of the valley. Such a road would doubtless require more grading, would cost more, and would destroy more trees and more square yards of pretty under-growth than a road at the bottom of the gorge, but the damage of the latter would be done at the vital spot. It would be the pound of flesh from nearest the heart, while the former would compare with the amputation of a leg<sup>5</sup>.

The Olmsted Brothers’ 1917 report repeated the need to protect the character of Beach Drive:

This is the value which was first preserved by [an] Act of Congress for the benefit of all people. It is now and always will be the only value that can justify the maintenance of this great natural park....Roads and trails should always and unmistakably fit into the landscape as harmonious and subordinate parts of the scenery through which they pass.

In addition to the impact listed above, the Conservancy strongly supports consideration of net benefits to natural resources that would arise from such a decision. The natural resources in the park have degraded further since the 2007 publication of the park’s General Management Plan, and the park’s Resource Stewardship Strategy sets out ambitious goals for their protection. The Resource Stewardship Strategy notes (p 20) that “Beach Drive...is used extensively by commuters, creates the backbone of the park, but also contributes to issues related to visitor safety, noise, air quality, and habitat fragmentation.” The forests that surround Beach Drive hold approximately 100,000 tons of above ground carbon<sup>6</sup>; any steps taken to protect these fragile forests in the face of climate change provides tremendous benefit to the region and the world.

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<sup>5</sup> McMillan Plan ([The Improvement of the Park System of the District of Columbia](https://www.nps.gov/parkhistory/online_books/mcmillan/plan.pdf) (Washington: Government Printing Office, 1902). Accessed via [https://www.nps.gov/parkhistory/online\\_books/mcmillan/plan.pdf](https://www.nps.gov/parkhistory/online_books/mcmillan/plan.pdf)

<sup>6</sup> Gonzalez, P. 2017. Climate Change in Rock Creek Park, Washington, DC, USA. National Park Service, Berkeley, CA.

One final consideration of the concepts is cost. As the park's philanthropic partner, the Conservancy is keenly aware of the budget challenges faced by Rock Creek Park. Removing steady automotive traffic would reduce, even marginally, the maintenance burden on the park, including the historic bridges. A concept that requires frequent opening and closing of the gates would sap already limited Park Police resources and potentially direct them away from more pressing safety and resource damage matters.

When Rock Creek Park was established in 1890, the auto had barely been invented. By the time of the Olmsted report, the 102 million US residents owned 3.6 million cars, or approximately 0.03 cars per person. Today the 328 million Americans own more than 250 million cars, a more than 100-fold increase in auto ownership. This context must be considered in management plans, just as climate is factored into natural resource management.

The crux of Concept 2 is the removal of through auto traffic, which tends to use the park for commuting or transportation, rather than recreation, as outlined in the park's enabling legislation. Rock Creek Park is truly the heart, lungs, and soul of Washington, DC. Rather than taking 'a pound of flesh' from that heart, the Conservancy encourages the National Park Service to honor early plans for the park by selecting Concept 2.