

Government of the District of Columbia
ADVISORY NEIGHBORHOOD COMMISSION 3F
Van Ness • North Cleveland Park • Wakefield • Forest Hills

3F01 – David Dickinson
3F02 – Shirley Adelstein, Treasurer
3F03 – Naomi Rutenberg
3F04 – Deirdre Brown
3F05 – Andrea Molod, Secretary
3F06 – Malachy Nugent, Chair
3F07 – Patrick Jakopchek, Vice Chair



4401-A Connecticut Ave, N.W.
Box 244, Washington, D.C. 20008
commissioners@anc3f.com
www.anc3f.com
202-670-7ANC
Twitter: @ANC3F

February 2, 2017

Frank Young, Acting Superintendent, Rock Creek Park
Attention: ROCR DCP
3545 Williamsburg Lane, NW
Washington, DC 20008

Superintendent Young:

In DC's highly urbanized area, Rock Creek Park stands out. For our local ANC 3F community, countless other people across the region, and the diverse array of plants and wildlife that live in its forests, Rock Creek provides a welcome oasis from the bustling city that surrounds it.

Many residents of ANC 3F are frequent users of Rock Creek Park--hiking, running, bike riding, birding and horse riding. We share flora and fauna with the park and community members contribute labor and expertise to maintain and protect the park. As an immediate neighbor of the Nature Center, Horse Center and Maintenance Yard (which are situated in the boundaries of the ANC 3F), we have a strong interest in a balanced, thoughtful development of the site.

Rock Creek Park was established to "[preserve] from injury or spoliation of all timber, animals and curiosities within the Park and their retention in their natural condition, as nearly as possible."¹ This principle has been repeatedly reaffirmed over the years.²³

Relatedly, in 2007, the National Park Service (NPS) declared, "Rock Creek Park's forests are home to a variety of wildlife. Our goal is to protect the park's wildlife by ensuring that native plant and animal species function in as natural a condition as possible."⁴

Our commission supports those principles and, in general, the efforts to address the complex's maintenance backlog, undertake needed repairs, improve accessibility to and around the facility, and better meet the needs of park visitors and staff. We also agree with the standard

¹ 1890 Act, Section 7. See <https://www.nps.gov/rocr/learn/historyculture/adh1aa.htm>

² Rock Creek General Management Plan, <https://www.nps.gov/rocr/learn/management/upload/rocrgmprod.pdf>

³ *Rock Creek Park Long Range Interpretive Plan (March 2010)* <https://www.nps.gov/hfc/pdf/ip/2010-05-07-RockCreekLRIP-FinalDocument.pdf>

⁴ 2007 Centennial Strategy for Rock Creek Park

https://www.nps.gov/rocr/learn/management/upload/ROCR_Centennial_Strategy.pdf

outlined by your *General Management Plan* that such improvements should be accomplished by “generally [retaining] the current scope of visitor uses”.⁵

With those principles in mind, we wish to express our concerns that a number of the proposed “improvements” and new uses for the complex, particularly those outlined in Concepts 3 and 4 of the plan released in November, differ from, far exceed, and potentially conflict with current visitor uses of the park:

- The construction of new multipurpose rooms and classrooms would require increases in parking in multiple sites and could impair locations across the park. For instance, under Concept 4, the Maintenance Yard building and parking lot for staff would be expanded into undisturbed forest that is currently a frequent stopping place for warblers, vireos, and other birds.
- New programming like weddings and large events would conflict with visitor use of the Nature Center and nature programming. They may also incentivize violations of the park’s long-standing policy to be closed at night.
- The birdwatching walkways suggested for the ravine west of the Maintenance Yard and for the Nature Center would require difficult and costly engineering in this steep terrain and could destroy prime bird habitat, along with the felling of numerous trees over 100’ tall. Further, such walkways may also be unnecessary and counterproductive. According to local birders, birds tend to avoid such structures.
- According to some horse owners, noise from food trucks and diners could spook the horses, as could noise from the blacksmith shop and increased presence of people at the exhibit hall. These uses would also further overwhelm forest-dwelling birds, causing them to seek sanctuary elsewhere.
- The increased number of buildings, parking lots and other impervious surfaces and corresponding decrease in trees and other natural surfaces could create a significant increase in stormwater runoff. In Concept 4, impervious surfaces at the Horse Center alone would be more 4 times the amount of existing hardscape.
- New and expanded uses at the Nature Center Complex could lead to increases in traffic through local neighborhoods. With that in mind, a traffic study should be made part of the environmental assessment for this plan.

Based on the above, this project has the potential to significantly affect the quality of the Rock Creek Park environment. We understand that NPS plans to conduct an Environmental Assessment (EA). Should NPS make a finding of no significant impact (FONSI) within the EA, then ANC3F requests a full explanation clarifying and supporting the FONSI. In addition, ANC3F believes that this area of Rock Creek Park is an environmentally sensitive area and deserves

⁵ Rock Creek General Management Plan, Page 3

many of the considerations normally associated with a comprehensive Environmental Impact Statement (EIS). As such, a rigorous exploration and objective evaluation of all reasonable alternatives (within the alternatives studied under the EA) and the criteria of such assessment be clearly identified. ANC3F also requests that appropriate consideration be given to mitigation measures to ensure that the principles and declarations noted above will be met. We take no position on whether a full EIS may be required for this project (we reserve our position), but request that the obligations of environmental protection be preserved and explained by NPS.

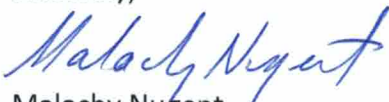
ANC 3F recognizes that certain repairs and improvements to the Nature Center Complex are a necessary part of protecting the park's long-term resources and enhancing the overall visitor experience. We also understand NPS's desire to lower the total cost of facility ownership and capitalize on potential revenue generation within the park.

However, these aspirations must be balanced with the existing attributes for which the park is already cherished. As NPS's own management plan makes clear, simply increasing human activity within the park should not be this project's goal, especially if those new uses compromise existing ones.

For instance, the limited human use of the area around the current nature center (along with the scattered layout and small scale of the buildings, and the tall trees growing throughout the complex) affords forest-dwelling birds the cover they need to thrive and has helped make the area a regionally and nationally recognized "hot spot" for migrating birds. Were that experience to be damaged by a loss of habitat, increased noise or the construction of unnecessary, counterproductive structures, many in our community would view this project as a disappointing step backwards, instead of the coveted upgrade and enhancement we all hope it will be.

As your agency continues to explore this redevelopment project, ANC 3F urges NPS to resolve the project's potential conflicts outlined above, continue engaging the community in this important dialogue and balance the park's necessary upgrades with Rock Creek Park's establishing principle to preserve "native plant and animal species in as natural a condition as possible".

Sincerely,



Malachy Nugent
Chair, ANC 3F