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

December 15, 2017

Julia Washburn, Superintendent, Rock Creek Park
Attention: ROCR DCP
3545 Williamsburg Lane, NW
Washington, DC 20008

RE: Rock Creek Park

Superintendent Washburn:

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.

Our ANC3F Commission supports the principles and goal expressed in 2007 by the National Park Service (NPS) when it 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.”¹

With regard to the planned improvements and enhancements, we understand and, in general, support 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 outlined by your *General Management Plan (GMP)* that such improvements should be accomplished by “generally [retaining] the current scope of visitor uses”.²

In February of this year ANC3F expressed a number of considerations and concerns in relation to the proposed “improvements” and new uses for the complex. With an updated version of the Concept Plan released this past November, we again wish to relay our views.

There are a number of features included and issues addressed that we are pleased to see within the updated plans:

¹ 2007 Centennial Strategy for Rock Creek Park

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

² Rock Creek General Management Plan, Page 3

- The removal of Concept 4 from the plan is applauded by ANC3F. We believed the level of this concept's impact to park resources and experiences was not appropriate and are heartened to see that NPS concurs with this view.
- The preservation of the existing footprint for the center's parking lot in both Concept 2 and 3 is an excellent decision that will help prevent potential increases in storm water runoff that would have accompanied the introduction of additional impermeable surface in this area.
- The removal of the bird watching walkways proposed within earlier concepts is another sound change that shows NPS is listening to community input.

However, ANC3F still has a number of concerns related to the revised concepts that we believe could cause conflicts with the park's existing uses along with NPS's stated purpose and goals for Rock Creek:

- The size of the maintenance yard in the revised Concept 3 would very likely disturb existing ornithological habitats. Local birdwatchers have expressed their desire to see the existing fence line maintained. We believe this request makes sense, especially within the context of the GMP's standards related to retaining the current scope of RCP's uses.
- The increased size of the nature center building in Concept 3 could require the removal of chestnut oak trees along its northeast side. We encourage an examination of the site's footprint and orientation in as much detail as possible, with the aim of minimizing or fully mitigating the danger posed to these trees by both potential building additions and the act of construction itself.
- 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.
- We have serious concerns about the actual demand for food trucks in the park and whether it would be sufficient to justify the dedicated space for these vehicles within Concept 3.
- The increased number of buildings, parking lots and other impervious surfaces and corresponding decrease in trees and other natural surfaces would create a significant increase in stormwater runoff, exacerbating an already substantial threat to the park's overall health. Although the largest additions to these impervious areas have been eliminated with the removal of Concept 4, more can still be done including committing to using permeable surfaces in the construction of the significant amount of new sidewalks proposed within every concept.
- The indoor riding ring proposed in both Concepts 2 and 3 would likely affect wetlands and streams on both sides of the ring. Any construction plans for this ring should include detailed designs aimed at protecting the wetlands and streams, as well as handling new drainage issues the ring might create.

- Two of the new horse turnout spaces south of the riding ring in both Concepts 2 and 3 would be built over a steep, wooded ravine that has an ephemeral stream running through it. Removing the trees and filling in the ravine for these horse turnouts would be devastating to that area and the natural conditions of the native plant and animal species that inhabit it.
- With the success of the new and expanded uses at the Nature Center Complex it would likely lead to increases in traffic through local neighborhoods. With that in mind, ANC3F still strongly believes that a traffic study must 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, including the issues raised by this letter. In addition, ANC3F believes that this area of Rock Creek Park is an environmentally sensitive area and deserves 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, enhancing the overall visitor experience and improving accessibility. We also understand NPS's desire to lower the total cost of facility ownership and capitalize on potential revenue generation within the park.

However, we must balance these aspirations with the existing attributes for which the park is already cherished.

As your office continues to explore this redevelopment project, ANC 3F urges NPS to continue resolving 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,



Pat Jakobchek
Acting Chair, ANC 3F