

**People's Alliance for Rock Creek (PARC)
2599 Ontario Rd. NW
Washington, DC 20009
202-750-0611**

July 27, 2021

Superintendent
Att: Beach Drive
Rock Creek Park
2545 Williamsburg Lane N.W.
Washington, DC 20008

Re: Upper Beach Drive Management Plan

Dear Superintendent Washburn:

The People's Alliance for Rock Creek (PARC) thanks you for undertaking the planning process to evaluate the future use of upper Beach Drive in Rock Creek Park. We are a grassroots coalition of 25 organizations and more than 6,000 people who use and love Rock Creek Park and believe that it should be optimally managed for recreation and conservation.

PARC represents diverse supporters from all ages, backgrounds, ethnicities, genders, physical condition and interests. Our supporters live in all wards of the District, as well as Maryland, Virginia and many other states. We believe that the resources of upper Beach Drive should be preserved for present and future generations and that the upper Beach Drive roadway should not be used as an auto commuting route.

PARC thus supports the National Park Service's (NPS) Management Concept 2, ***Full Closure for Recreation***, as articulated during your July 8, 2021 public meeting (the Public Meeting).

Please consider these comments for both the National Environmental Policy Act (NEPA) documents and the National Historic Preservation Act Section 106 public review for compliance with those laws.

Overview

The current overwhelmingly popular weekday traffic management procedure is the same that has been in place on weekends since the 1980s. Under this procedure, three sections of upper Beach Drive are closed to motor vehicles, preventing through traffic and reserving the sections for pedestrians and cyclists. Making these zones car-free permanently would maintain a safe, quiet, and low-pollution greenway in the city's largest park for families, walkers, runners, bicyclists, wheelchair users and other outdoor enthusiasts -- seven days a week.

Because of the intimate relationship between users of the National Park and residents of the city of Washington, we urge close cooperation between NPS and the District of Columbia

government in implementing Concept 2 to prudently manage all forms of transportation through, across, and adjacent to Rock Creek Park.

NPS has previously reviewed the question about an upper Beach Drive closure on several occasions, most recently as part of its General Management Plan (GMP) process, which concluded in 2007. At that time, it issued a determination ¹ that its Preferred Alternative was to keep the road open during weekdays, particularly to facilitate rush hour, through traffic. In balancing competing interests then, NPS placed major emphasis on its decision as supporting the will of the District of Columbia and Montgomery County Councils, citing their concerns about the potential impacts of closure on the regional street grid. (*GMP EIS, page 69*)

Local views on this question have taken an about-face over the ensuing period, with both the DC City Council ² and Montgomery County Council ³ adopting formal resolutions in recent months to keep upper Beach Drive closed to commuter traffic. Neither local council has reiterated any of the previous concerns about the closure having adverse effects on the street grid or upon commuters.

Specific Comments on Environmental Assessment

The following comments align with the “Potential Issues and Impact Topics” that NPS identified as important to its Environmental Assessment, noted in Slide 10 of the Public Meeting presentation. Note that we have combined the issues of Historic Districts with Cultural Landscapes, as we believe these issues to be closely aligned with one another in the Rock Creek Park setting, and have begun our discussion with those topics to set the stage for the ensuing discussion.

- I. Historic Districts/Cultural Landscapes**
- II. Visitor Use and Experience**
 - A. Access/Accessibility*
 - B. Traffic Impacts*
 - C. Visitor Safety*
 - D. Availability of Recreational Opportunities*
- III. Environmental Impacts**
- IV. Other Concepts**

¹ *Final General Management Plan Environmental Impact Statement: Rock Creek Park and the Rock Creek and Potomac Parkway*, June 2004 (the “GMP EIS”).

² Resolution R24-0119, Effective from Jun 01, 2021 Published in DC Register Page 006121

³https://www.montgomerycountymd.gov/council/Resources/Files/agenda/col/2021/20210615/20210615_3_P.pdf

Note: Although the Public Meeting presentation did not specifically identify the environmental impacts of reopening the roadway to commuter car traffic as an issue or topic, we have added a discussion of this important consideration at the end of our discussion.

I. Historic Districts/Cultural Landscapes

PARC believes that opening upper Beach Drive to primarily recreational (non-automotive) uses is consistent with the historic purpose of the park and its cultural landscapes.

Rock Creek Park itself was first established in 1890 to protect the natural and historical landscape of the Rock Creek Valley in Washington, D.C. The park was one of the first designated federal park units, and among those early parks was unique due to its proximity to an urban center. Its location makes it highly accessible for city residents and visitors alike to experience a tranquil natural setting for its own sake or in pursuit of any number of recreational activities.

As stated in the enabling legislation, Rock Creek Park is “*perpetually dedicated and set apart as a public park or pleasure ground for the benefit and enjoyment of the people of the United States,*” which included “*the construction of driving roads and trails for horses and pedestrians*” while preserving the park’s “*timber, animals, and curiosities . . . in their natural condition, as nearly as possible.*” Sometimes lost on readers of this citation is the fact that “driving” does not refer to the use of automobiles but rather to driving a horse and buggy, in that internal combustion engines did not become widely available to the public until after the turn of the century.

PARC believes that, as a matter of legislative history, the continued use of Beach Drive as a higher-speed automobile commuting thoroughfare is not compatible with Rock Creek Park’s purpose 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.*”

A decade or so after the park was created, early planners were confronted with more widely available automobiles, and determined that the park in its then-pristine state was incompatible with their use. The 1902 McMillan Plan for Washington’s parks noted about Beach Drive:

“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 wider 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 sight 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."

In 1916, when the Olmsted Brothers issued their Plan for the Park, an emphasis on the park's natural beauty was paramount in considering the design and use of travel corridors, rather than expanding its use to automobiles. It states:

"...In this beautiful valley with its many ramifications they are found in a high degree of perfection and in almost unlimited variety. It is the extraordinary combination of this circumstance with the proximity of the valley to a great city that gives to the Park its unique value. This is the value which was first preserved by 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."

The remaining history of Beach Drive to the present date has seen various decisionmakers move the park pathway more toward a thoroughfare. Upper Beach Drive was made into a paved road in 1929 for auto use. During the mid-1930s, the road below Calvert Street—Rock Creek Parkway—was expanded into a faster four-lane road. (Soon after its completion in 1937 NPS agreed to allow one-way traffic during morning and evening rush hours, a regimen that continues to the present.)

During the 1950s and 60s, there were numerous plans to use Rock Creek Park as the location for freeways and expressways from Maryland to downtown; fortunately, these efforts were stymied by defenders of the park.

Even though the new Rock Creek Parkway efficiently moved cars to Connecticut Avenue, and the new Piney Branch Parkway moved them to 16th Street, upper Beach Drive was still used by some car drivers for access to points north. Until 1966, however, through-traffic using upper Beach Drive had to navigate its way around the Zoo and through two fords, making for a slow, difficult car journey and limiting traffic volume. Cars also could not use the Zoo bypass outside of daylight hours. This all changed with completion of the Zoo Tunnel in 1966, which was agreed to by the Smithsonian in exchange for NPS granting it parkland to construct a new parking lot alongside Beach Drive.

Many of the decisions recounted in this brief history demonstrate that NPS decisionmakers have been under recurring pressure to open upper Beach Drive to more car traffic. The changes have been incremental over time, but cumulatively they have severely damaged the original vision for the park. There is now, on either side of Calvert Street, a four-lane highway and an auto-centric two-lane road whose 25-mph speed limit is regularly ignored except during times of traffic

backups. Neither the endemic speeding violation nor idling traffic backups meet the founders' notion that Beach Drive fits into the landscape as a harmonious or subordinate part of the scenery. The vast majority of drivers see it as a traffic light-free route to speed from one place to another without stopping.

In addition:

- **The Boulder Bridge.** Boulder Bridge, between Broad Branch and Military Roads, built in 1902, is, according to the 2005 General Management Plan, *“the quintessential symbol of the rustic character and picturesque design of the first park structures. It is Washington’s finest example of rustic bridge architecture....”* It is also listed on the National Register of Historic Places. The problem of auto traffic on Boulder Bridge is particularly acute, not only because of the risk of damage to this unique structure but because of extreme danger to pedestrians and bicyclists when sharing the twisting, narrow roadway at this location. (It is worth remembering that traffic across this scenic bridge was far sparser before the Zoo Tunnel was constructed and several creek fords were eliminated. The additional traffic puts this iconic bridge and its users at much greater risk.)
- **Access to Cultural Locales:** Importantly, the restriction of car traffic between the Maryland line and Broad Branch Road does not preclude automobile access to the Horse Center, Nature Center, Planetarium, Golf Course, Carter Barron Amphitheatre, Park Police Substation, Peirce Mill, National Zoo, Zoo Tunnel, Rock Creek and Potomac Parkway, Georgetown, Downtown, Kennedy Center or the Mall. Moreover, the restriction does not preclude automobile access to virtually all of approximately 130 picnic tables in the park, including all the Beach Drive reservable group sites along Rock Creek north of Military Road. Any inconvenience to motorists is and would continue to be minimal due to the availability of alternative routes and access points inside and outside the park.

II. Visitor Use and Experience

A. Access/Accessibility

1. Access for the Young, Old, and Disabled

PARC believes that opening upper Beach Drive to primarily recreational (non-automotive) uses will increase access/accessibility for the widest range of users.

Our view is that access/accessibility to the park for those who would use it during weekday closures has drawn a brand-new group of users, most of whom would not otherwise visit during the week. We disagree with those who, in various forums, have claimed that the current closure fails to accommodate access for seniors and the disabled. Our view is that the closure to car traffic has actually enhanced access for those with physical limits, including the elderly, young children and the disabled in areas they never would be able to enter during weekdays when cars

are permitted on Beach Drive. Anecdotally, our supporters report seeing more children with families, and wheelchair-using or cane-using persons on the roadway, who find the tranquil setting to be one of the few spots in the city with enough room to accommodate everyone without fear of conflicts with vehicles.

Also, it is important to reiterate that under current closure protocols, access to most of Beach Drive is still permitted for cars that can transport those with limited mobility for a ride in the park.

2. Access from Neighborhoods East of the Park

According to the Census Bureau, 37 percent of D.C. households are carless. When upper Beach Drive is dedicated to auto traffic five days a week, these households are effectively denied access to the heart of the park.

This is a particularly important issue east of the park, given the limited nature of most of the access points from that side. North of Blagden Avenue, there are no paved access points except for Sherrill Drive, Joyce Road, and Morrow Drive, although we understand better Military Road access from the east is to be studied. Each of these is designed for cars and does not have sidewalks or a bike path. If commuter traffic resumes on upper Beach Drive, that would deny safe access to the park for pedestrians and many cyclists five days a week. Concept 2 provides more safe access for pedestrians and cyclists east of the park.

B. Traffic Impacts

Although we await NPS and DDOT's analysis of the traffic impacts of the various concepts under consideration, PARC believes that existing data and recent experience indicates that opening upper Beach Drive to primarily recreational (non-automotive) uses will not have significant traffic impacts on surrounding arterials and neighborhood roads. We also believe that if impacts appear in any localized areas, DDOT and NPS have available tools to mitigate those impacts.

Beyond traffic, the impact on surrounding neighborhoods of Concept 2 would be overwhelmingly beneficial in our view, providing enhanced safe recreation space for people of all ages and abilities. This explains why more than 6,000 people—most of them from neighborhoods bordering the park—have signed PARC's petition to keep the road closed to auto traffic.

Nevertheless, we understand there is concern about diversion of some cars onto neighborhood roads that can be accommodated with DDOT's prudent implementation of techniques from its traffic calming toolkit. This section cites the GMP traffic analysis from 2004, the 2016-2019 experience during reconstruction of Beach Drive, and a recent analysis of traffic during the pandemic to support our views, before discussing traffic calming measures.

1. General Management Plan Traffic Analysis

The 2004 Traffic Study for Rock Creek Park (December 14, 2004), which supported the Park Service's General Management Plan for the park, concluded that levels of service on alternative routes for a proposal similar to Concept 2 would remain within those of "*acceptable traffic operations (page 2-21)*." The study, however, only evaluated the impact of a midday closure on roads outside the park.

2. The 2016-2019 Experience

Between 2016 and 2019, when the National Park Service closed portions of Beach Drive to all users in stages to reconstruct the road, the District Department of Transportation (DDOT) counted traffic data for roads paralleling the park. During 2018, when the section of upper Beach Drive for which permanent closure is being considered was closed for construction, DDOT found that car traffic on alternative north/south routes outside the park (16th Street, Georgia Avenue, Broad Branch Road, and Connecticut Avenue) declined as compared with traffic levels in 2015, the last year before construction began.⁴ For example, at its Permanent Counting Station at 16th Street and N. Portal Drive, average annual daily volumes (AADV) during 2018 were 29,300 compared to 34,600 in 2015, while the AADV counts on Connecticut Avenue at Chevy Chase Circle were 29,400 for 2018 and 29,500 for 2015.

3. COG Transportation Planning Board Study

According to the Council of Governments' Transportation Planning Board, traffic volumes in the District of Columbia have declined 20 percent compared with pre-covid levels. While the volume will undoubtedly rebound, there is much speculation that telecommuting options will be made more widely available, thus reducing commuter traffic as compared with pre-COVID levels.

4. Traffic Calming Tools

Nevertheless, some neighbors on both sides of the park sense that traffic on their streets has increased in the past year. PARC encourages the District Department of Transportation and NPS to measure the level of auto traffic on key neighborhood streets so as to work with residents of surrounding neighborhoods to improve vehicle and pedestrian safety on those streets.

One example is Chestnut Street NW, where residents assert that their street traffic has increased. They blame the upper Beach Drive closure, but it is equally (or more) likely due to the contemporaneous closure of Oregon Avenue for reconstruction, with the designation of Chestnut Street as a signed detour route. A distinct supposition is that when Oregon Avenue reopens, traffic on Chestnut Street will subside to prior levels. Further, just last week DDOT has commenced construction of a sidewalk along Chestnut Street, that will both provide a safe

⁴ https://wiki.ddot.dc.gov/download/attachments/36798728/DDOT_2019_TrafficVolumeMap.pdf?api=v2

passage for pedestrians and children while slowing traffic due to having a narrower road footprint.

As with all roads near the park where residents perceive greater traffic volumes, we encourage DDOT to utilize traffic calming techniques. On many streets, DDOT would be able to deploy speed humps, speed tables, traffic circles, speed cameras, intersection necks and/or other traffic calming measures, along with new sidewalks where they are not already installed.

Most importantly, we believe that NPS should stipulate that its consideration of traffic impacts assumes that DDOT will take necessary measures to help mitigate any impact on neighborhood streets. This is the same approach NPS took in its 2004 General Management Plan Environmental Impact Statement.⁵

C. Visitor Safety

Ironically, making improvements to user safety was a major issue NPS cited when it decided in 2004 to keep the park open to commuters. NPS then concluded:

Long-term, major, beneficial effects on public health and safety would occur, primarily because of the effectiveness of traffic-calming measures in reducing the number and severity of traffic accidents. (2004 Statement, page 129)

PARC questions whether safety did improve in any meaningful manner for non-car users between the date of that decision and the Covid closure. In 2004, NPS stated that keeping the road open during the week would mean *“pedestrians and bicyclists using the Beach Drive corridor during the week would have a higher level of difficulty and risk because of traffic. However, the traffic calming devices would lower motorized vehicle speeds to make joint recreational use safer.”*⁶

In retrospect, this statement by NPS seems to have been wishful thinking. Before the Beach Drive reconstruction and COVID closures, only the hardiest of cyclists used the roadways north of Broad Branch Road during rush hours, and no pedestrians used the roadways at all. Until the road reconstruction, when three raised crosswalks were added south of Broad Branch Road, we are unaware of the implementation of any traffic calming measures. Signs have been installed that indicate cyclists may use the road, but there are no active road markings (like sharrows) visually endorsing cyclists' right to use the roadway.

Another aspect of safety is the personal security of park users. While we have no data on this, anecdotally, many PARC supporters, particularly women, comment that they feel safer from

⁵ GMP EIS, 2004, page 106.

⁶ GMP EIS, 2004, page 72

physical assault by being on a roadway that has a large number of human users who could hear a cry for help.

D. Availability of Recreational Opportunities

Opening upper Beach Drive to primarily recreational (non-automotive) uses will increase the availability of recreational opportunities significantly.

For 40 years, the three sections of Beach Drive north of its intersection with Broad Branch Road and Blagden Avenue have been reserved for non-motorized recreation on weekends. Cyclists, runners, and other pedestrians have made the road one of D.C.'s most popular recreational venues, with hundreds of people using it in all seasons.

PARC and other groups have encouraged the Park Service to reserve these road sections for recreation on weekdays as well as weekends for most of those 40 years, but the issue has always been, "Who would use the road on weekdays if car access was restricted?" During the pandemic, we have had a chance to find out. At the request of members of the D.C. Council and the Mayor, NPS has restricted auto traffic on the three road sections seven days a week (as Concept 2 would do), reserving it for healthy, socially distanced recreation.

To find out how much the road was being used, PARC, with NPS permission, recruited volunteers and counted road users for five hours a day on 12 days over a 4-week period. We found 28,741 users, an average of 529 per hour. The demand for this road as a recreational venue is substantial. (*See Appendix*)

PARC's view is that, in the absence of road closure, the vast majority of users we counted (aside from some hardy cyclists) would not otherwise use the park on weekdays. Thus, we support Concept 2. The road should continue to be managed as it has been for the last year. Work arrangements are likely to be more flexible, with more people working at home. The demand for weekday recreation will continue.

Finally, as Federal agencies and private businesses have grown and relocated from downtown to suburbs like Silver Spring and Bethesda, many people who want to commute to the suburbs on bicycles ride along Beach Drive. There are few bike paths suitable for commuting north of Broad Branch Road. This makes bike commuting quite dangerous on this section, especially in winter when the sun sets early. Closing the road to cars seven days a week will provide a safer alternative for people who wish to commute by bike to these locations.

III. Environmental Impacts

PARC is concerned by the stated intention of NPS to not address climate change in its analysis of the environmental impacts of the future use of upper Beach Drive.

The District of Columbia has a stated goal of reducing greenhouse gas emissions 50 percent by 2032. Under the District's plan, 75 percent of commute trips would be made without a car in that year.

On the Federal level, President Biden has stated a goal of reducing greenhouse gas emissions 50 percent by 2030. Transportation is the largest category of greenhouse gas emission sources.

The decision to reopen upper Beach Drive to commuter auto traffic would encourage auto use at a time when both the District and the Federal Government are attempting to discourage its use to address the threat of climate change. We believe that the environmental assessment needs to acknowledge this fact and evaluate the concepts/options' impacts on auto use.

In the EIS for the 2004 GMP, NPS stated that imposing high-occupancy vehicle restrictions (and presumably other measures limiting auto traffic) were consistent with regional policies that would improve air quality. It said (*2004 GMP EIS, Page 100*):

The following measures may be included as ways to reduce traffic speeds and the volume of nonrecreational traffic on Beach Drive.

- *Impose high-occupancy vehicle restrictions during rush hours on segments of Beach Drive that would not interfere with cross-park traffic. High-occupancy vehicle restrictions are consistent with regional transportation policies aimed at reducing reliance on single-occupant vehicles, reducing traffic congestion, improving air quality, and encouraging responsible commuting.*
- *Strengthen speed limit enforcement on Beach Drive.*
- *Implement traffic-calming measures to slow vehicle speeds. Such measures might include rumble strips, speed humps and speed tables, and intersection modifications such as all-way stops, traffic circles, reduced turning radii, and raised intersections.*

But NPS has not followed through on any of the potential mitigating actions it promised to consider to reduce the volume and speed of nonrecreational traffic on upper Beach Drive when it made the decision to leave it open to weekday car traffic back in 2004.

Concept 2 will be more consistent with D.C. and region-wide transportation and air quality policies, reducing auto use in the park itself and signaling that there are other, less polluting transportation alternatives to driving.

IV. Other Concepts

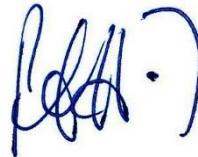
In opening the public comment period on the upper Beach Drive planning process, NPS identified two concepts for the future management of the road: 1) no action, which would give the road back to motor vehicles except for a 36-hour period on weekends; and 2) closing the road to motor vehicles seven days a week, as has been the case since April 2020.

The document then listed a number of other options, including: closure on Monday and Friday; a mid-day closure period; seasonal (summer only) closure; or partial closure (e.g., closing the section between Joyce Road and Broad Branch Road, but opening the other two sections to auto traffic). The document doesn't refer to any of these options as "concepts," and it is unclear from the document whether NPS is evaluating them in a similar manner to Concepts 1 and 2.

PARC's view is that none of the options listed after Concept 2 would meet NPS's obligation to preserve the park's "timber, animals, and curiosities ... in their natural condition, as nearly as possible." They would treat that obligation as a part-time requirement. Nor would these options meet the overwhelming demand (as expressed by more than 6,000 signatures on PARC's petition and by the votes of both the Council of the District of Columbia and the Montgomery County Council) for closing the road segments to motorized vehicles seven days a week in order to create safe, accessible recreation zones for people of all ages and abilities.

In conclusion, by choosing Concept 2, NPS would most nearly meet its obligation to "set [Rock Creek Park] apart as a public park or pleasure ground for the benefit and enjoyment of the people of the United States."

Sincerely,



Peter Harnik
Coordinator
