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Brian Joyner, Acting Superintendent

ATTN: Golf Course Rehabilitation

Rock Creek Park

3545 Williamsburg Lane NW

Washington, DC 20008

 November 3, 2023

Dear Acting Superintendent Joyner,

Nature Forward, formerly the Audubon Naturalist Society, is pleased to submit these comments on the Rock Creek Park Golf Course Rehabilitation Environmental Assessment (EA) prepared by the National Park Service (NPS) and the National Links Trust (NLT). For 126 years, Nature Forward has inspired people to enjoy, learn about, and protect nature. Nature Forward conservation priorities include human health and access to nature, protecting biodiversity and habitat, fighting the climate crisis, and sustainable land use. We request that NPS/NLT consider our comments for purposes of the EA’s compliance with the National Environmental Policy Act (NEPA).

Nature Forward supports rehabilitation of the Rock Creek Park (RCP) golf course in a manner that will enhance the experience of park visitors, including both golfers and other members of the public, with minimal adverse impacts. We appreciate that the location of the golf course within the boundaries of an 1800-acre urban park must inevitably shape (and complicate) this project. As established by Congress in 1890, RCP was and still is intended to give city residents and visitors a tranquil natural setting and facilitate recreational opportunities. The RCP enabling legislation called for the creation of driving and carriage roads and trails for pedestrians, horses, and bicycles, while preserving RCP’s “timber, animals and curiosities” in their natural condition, as nearly as possible. EA, p. 1. It is challenging to apply these criteria 133 years later, but the EA endeavors to do so.

**NPS/NLT Should not Issue a FONSI until Sufficient Support for the EA’s Conclusions Is Provided**

EA Alternative 1 is the no-action alternative. EA Alternative 2, the preferred alternative, is to rehabilitate the golf course to “address deferred maintenance, increase playability, broaden course appeal to the local community, and achieve financial stability” for the operation of the golf course. EA, p. 5. The specificity of this statement of purpose is such that it appears only Alternative 2 could accomplish it. We concur with Rock Creek Conservancy’s suggestion in its EA comments that NPS/NLT propose additional alternatives to the no-action alternative that could meet these goals without creating the adverse environmental impacts associated with EA Alternative 2.

In our view, many of the conclusions in the EA are not well-supported. The EA needs more specificity on both the rehabilitation activities that NFS/NLT will (or might) undertake and the likely environmental impacts of those activities. More detail and granularity is needed, for example, concerning the adverse effects of removing over eight acres of mature woodlands on the golf course as well, and the effect of the project on golf course water resources, wetlands, and wildlife. Moreover, not all of the studies and analyses referenced in the EA have been made readily available to the reader, and it appears some studies will be performed in the future (presumably after issuance of the finding of no significant impact (FONSI). See 40 CFR 1501(c)(1). Because the EA does not provide the requisite “evidence and analysis” to support its conclusions, the document fails to support a FONSI.

Issuance of a FONSI by a federal agency requires a rational connection between the facts provided in the EA and the conclusions reached in the EA.[1] Where, as here, the EA fails to provide such a connection, NPS should delay issuance of a FONSI until the agency has adequately addressed the concerns raised about the EA and fully informed the public as to the measures planned and/or undertaken. This remedy should be provided before NPS/NLT begins construction, tree removal, grading, or vegetation management, or takes other actions potentially affecting golf course water, wetlands, and wildlife.

The golf course, opened in 1923, occupies about 100 acres in northeast Rock Creek Park. Designed in the “parklands style” on the sloping, partially wooded topography of RCP, the golf course is now listed in the National Register of Historic Places as a contributing resource to the RCP Historic District. The EA states that the golf course retains “much of its integrity of location, historic design, setting, materials, workmanship, feeling, and association but is experiencing numerous management challenges.” These challenges include: “overgrown, encroaching vegetation that has narrowed the fairways and decreased playability; a lack of clear pathways for pedestrians and golf carts; the lack of a driving range; the deterioration of turf grass throughout the course; and limited facilities to accommodate golf course operations, golfers, and non-golfers.” EA, p. i.[2]

**EA Discussion of the Removal of 1262 Trees on the Golf Course**

Nature Forward is concerned about the scope of tree removal (permanent elimination of forested habitat) planned in connection with the golf course rehabilitation. NFS and NLT plan to selectively remove trees that “encroach on historic view corridors and affect playability.” EA, p. 47. Specimen trees that “support the historic character of the property” (EA, p. 45) will apparently be retained, though no details are provided on this statement. The criteria applied in determining which trees will be cut down include the health of the tree, its adverse effect on turf, air circulation, and whether the tree placement changes the original design intent of the golf course. EA, p. 48. On this point, it would appear that the NPS/NLT goal of preserving the RCP golf course as a cultural landscape is inconsistent with the goal of protecting forested land in the park. Some forest stands will also be cut to allow relocation of the maintenance facility.

A review of the EA shows that NFS and NLT plan to remove up to 1,262 trees, which (shockingly) is almost 50% of the tree cover on the golf course. EA, p. 45. EA Table 3 shows that this equates to removing about 8.64 acres of trees. EA, p. 45. The EA does not address the size or the species of trees to be cut down. Approximately 35% of these trees are said to be dead or in poor condition. The other 65% will be removed for purposes of “construction” or “agronomy” (the latter presumably means tree cutting is viewed as necessary to maintain adequate sunlight to the fairway grass). To better illustrate the overall effects of this tree removal process, the EA should provide more detail about the species composition and the size of trees to be taken out. All trees are not equal; large mature trees provide better habitat for birds and wildlife and transpire more than small trees.

Forests change and go through succession. The historic forest in Rock Creek Park in the 1920s differs markedly from the forest there today. Many early successional trees have died, making way for late successional species such as oaks and beeches. Further, many older trees are threatened by pests including Dutch elm disease, Emerald ash borer, and ambrosia beetles. Accordingly, any effort to re-create the historic (1920s) forest on the golf course would appear unrealistic. In this context, the proposal to remove 49% of the forest cover of the golf course for the sake of cultural/historic preservation and “agronomy” appears unjustified.

The EA states that while there would be an adverse cumulative impact to golf course vegetation from the removal of up to 1262 trees, this impact would be partially mitigated by the establishment of over thirteen acres of meadow habitat on the golf course, the “heightened focus” on removal of invasive plants from the golf course, and the proposed replanting of nearly 200 trees. EA, pp. 45, 48. We believe this mitigation is insufficient.

The EA states generally that sub-canopy tree species like redbuds and dogwoods will be planted to replace mature canopy trees but provides almost no statistics on species and size of any replacement trees. In any event, planting 200 small trees falls far short of mitigating the removal of 1,262 mature trees. We suggest that NPS require NLT to adequately mitigate the loss of late successional trees by planting an appropriate number and size of those trees either on the golf course or elsewhere throughout RCP.

**EA Discussion of Meadow Habitat Development**

To mitigate the proposed widespread tree removal, NPS/NLT propose to plant acres of meadow, including pollinator meadows, naturalized areas and riparian buffers, and native grass meadows in various locations throughout the golf course. EA, pp. 45-46, 51.

Nature Forward agrees that having more meadow habitats is generally beneficial for wildlife and invertebrate diversity. As NPS is aware, however, there are many challenges associated with successful installation and maintenance of meadow habitat. While the RCP meadow on Military Road includes some milkweed and other important plant species, that meadow is overrun with invasive vegetation requiring hours of hand removal by weed warriors. Mowing the proposed golf course areas twice a year as proposed will not maintain a diverse meadow habitat. If NPS/NLT proceed with planting meadows as partial mitigation for tree removal, the FONSI should contain benchmarks for the condition of the meadows, and NLT should be required to maintain healthy meadow habitats regardless of cost of maintenance.

On a related point, in its evaluation of impacts of Alternative 2 on vegetation, the EA (pp. 43-44) discusses “Environmental Trends” within RCP and other NPS park units in the region but does not include the perspective of tree cover throughout the District of Columbia. According to Casey Trees,[3] tree cover in DC declined from approximately 50% coverage in 1950 to about 30% in 2000. That loss has led Casey Trees to partner with DC government, NPS, and private citizens to try to attain 40% tree coverage throughout the District by 2035. The proposed golf course rehabilitation proposal will arguably exacerbate the loss of tree cover throughout the District by negating years of tree planting efforts by Casey Trees, NPS, and District citizens. We are disappointed that this important perspective is not addressed in the EA.

**EA Discussion of Impacts on Golf Course Water and Wetlands**

Wetlands and waters of the U.S. are among the topics excluded from further analysis in the EA. EA, pp. 7-9. The few wetland areas that are within the golf course are extremely important to wildlife. EA, p. 7. They support an array of vertebrates (e.g., frogs, toads, and salamanders) and invertebrates, including the endangered Hay’s spring amphipod. The proposed action includes efforts to protect these areas. EA, p. 7. The EA proposal to evaluate the use of groundwater to augment irrigation water for the golf course must include an assessment of how groundwater removal would affect groundwater and wetlands both on the golf course and in the Rock Creek stream valley beyond the boundaries of the golf course. EA, pp. 48-49, 52.

While we support the NPS/NLT proposal to capture stormwater and rainfall in cisterns and in a pond for golf course irrigation (EA, p. 8), the EA lacks quantitative information as to how much water will be needed for irrigation of the golf course under different rainfall patterns. Several years ago, the Washington area had a very wet year. In 2023, however, the area is 7 – 9 inches below normal. If NPS/NLT have quantitative information about how much water will be needed, and where NLT would get that water during different rainfall patterns, such data should be included in the EA (and in the FONSI) to help predict potential impacts of the proposed project on RCP wetlands. NPS should therefore delay issuing the FONSI until NLT completes its hydrologic evaluation (EA, p. 8), and incorporates specific benchmarks for possible well construction and use in the FONSI.

**EA Discussion of Impacts on Golf Course Wildlife**

The EA notes the presence of wild turkeys and coyotes at the golf course (EA, pp. 48-49) but does not mention that both species breed/roost in wooded areas of the golf course. These are some of the only places in DC where these two species breed and thrive because of the brush in the wooded areas between the fairways of the golf course. Granted, much of the ground cover is invasive vegetation. The EA downplays the possible adverse effects of the project on wildlife: “Wildlife may avoid areas of construction/tree removal and could be expected to return to these habitats once construction/tree removal is complete.” The basis for this conclusion is not provided. But it seems equally likely that species requiring trees and ground cover for foraging, nesting, roosting, and/or raising young will disappear if the trees are cut and not replaced. If NPS/NLT removes habitat for species like raccoons, foxes, and coyotes, they could push these species to find suitable habitat elsewhere in the Park or in neighbors’ yards. EA, pp. 49-50.

Wood frogs inhabit the vernal pool in the northwestern section of the golf course. EA, p. 48. Have they been observed breeding elsewhere in RCP? If not, this vernal pool would seem to be an important resource. Aren’t there also vernal pools and seeps just outside the boundaries of the golf course that could be adversely affected by water withdrawal up the hill from the pools? For example, the endangered Hay’s spring amphipod relies on seeps and wetlands (EA, p. 49). Even though none have been found on the golf course itself, there are known populations nearby (EA, p. 49). There are seeps and wetlands that may provide suitable habitat for them at the base of the hill in Rock Creek valley below the golf course. (EA, p. 49). Any removal of groundwater from a deep well could affect these downhill seeps. If so, NPS/NLT should analyze the effects of groundwater removal on those pools before issuing the FONSI.

**EA Discussion of Nature Trail and Social Trail Impacts**

We applaud the NPS/NLT proposal to build a “nature trail” around the perimeter of the golf course to improve pedestrian and cyclist access to the golf course. (EA, pp. 53-56). A nature trail could be a popular resource for non-golfers. Many people enjoy walking in RCP, especially on Beach Drive. RCP staff have documented the adverse impacts of social trails throughout the park. Yet NPS/NLT are not proposing to have a walking trail that connects to the extensive network of designated park trails and paths. If a nature trail and perhaps a snack shop/restaurant are developed in the new clubhouse, some walkers along Beach Drive are likely to cut through the woods to access these. Would NPS/NLT consider establishing a trail connecting the golf course trail to Beach Drive other than along Joyce Road? Cyclists can easily ride up Joyce Road or the new multi-use trail. To avoid people creating a “social trail,” we suggest NPS/NLT install a trail connection. Extending the multi-use trail along Joyce Drive all the way to Beach Drive to further expand equitable access to the park.

**Environmental Justice Impacts**

Although, environmental justice impacts were dismissed from further analysis (pp 9 -10) due in part to a commitment from NLT to ‘keep play affordable,’ a laudable goal consistent with Rock Creek Park as a public park with no entrance fee. The EA notes three approaches that NLT will take to accomplish this, which seem reasonable, but provide no metrics to determine whether the goal has been met. It is understood that, over the course of 50 years of operation, the specific tactics used to accomplish the goal are likely to shift, thus having goals for affordability and inclusion seem most reasonable.

**Conclusion**

Nature Forward supports rehabilitation of the golf course and the long-term lease with NLT in a manner that minimizes adverse effects on the natural habitats and the wildlife that live on the golf course. As discussed above, because the EA does not provide the requisite “evidence and analysis” to support its conclusions, the document fails to support a finding of no significant impact. We therefore urge that no FONSI be issued and no final decision on the proposal be made until NPS provides additional information to the public, to include:

(1) species composition and size of trees to be removed;

(2) species composition and size of trees to be replanted as mitigation for tree cutting.

(3) an NLT commitment to adequately mitigate the minimum amount of tree cover removal

(4) NLT completion of its assessment of irrigation water requirements for the golf course;

(5) NLT commitment to limit golf course groundwater removal to levels that will pose minimal impacts to groundwater, seeps, and vernal pools.

We appreciate the opportunity to comment and look forward to continuing our work with NPS and NLT as the project moves forward. Please contact Nature Forward if you have any questions about our comments.

Sincerely,

Jamoni Overby, DC Conservation Advocate, Nature Forward

Anne W. Cottingham, Nature Forward Volunteer

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