

APPENDIX

E

COMMENT ON THE EA AND RESPONSES





PEPC Correspondence  
Keep Private: Yes  
Date Received: 12/2/11

Any chance you could add a bike trail the extends from Arkansas down Piney Branch Pkwy at least to Beach Drive, where we can pick up the Rock Creek Trail into the city? I regularly commute that and must ride into oncoming traffic since there is typically a long line of cars, no shoulder, and no consistent bike trail for commuting bicycles.

01-01

Many thanks!

***Response to 01-01***

The preferred alternative would involve restriping of Piney Branch Parkway and widening of the Piney Branch Parkway trail to a width of six to eight feet. The proposed trail would include ADA-compliant ramps to connect the trail with Arkansas Avenue and the Rock Creek Park Multi-Use Trail.

***Response to 02-01***

Thank you for your interest and response. Your comments will be included as part of the public record for the project. A purpose of the project is to improve visitor safety and experience.

PEPC Correspondence  
Keep Private: Yes  
Date Received: 12/2/11

Thank you for the opportunity to comment on the proposed improvements to the Rock Creek Trail. This trail is very well used by city and region residents. The trail is crowded, especially on the weekends and can be dangerous at its narrower areas for pedestrians and bicyclists. The proposed changes are an excellent step in the right direction to improving the trail for public use and enjoyment. I hope NPS will continue to support improvements like these on Rock Creek Trail and other areas within the District of Columbia.

02-01

PEPC Correspondence  
Keep Private: No  
Name: Aaron Stainthorp  
Address: 1723 Webster Street, NW Washington DC, 20011  
Email: Sublaaron@gmail.com  
Date Received: 12/2/11

I wanted to endorse the idea to improve the portion of the Rock Creek Trail that runs through the zoo. My understanding is the preferred alternative includes repaving and widening many portions of the trail, providing an 8 ft. spur trail to Petree Mill, repaving the Rose Park Trail, and creating a pathway through the zoo tunnel.

As a cyclist who regularly rides in the park that section has needs to be widen to improve safety. Additionally during the times when the gates to the bike path near the zoo are closed bicyclists must travel through the tunnel and the current passageway is too narrow and unsafe.

I want to support this preferred alternative and thank NPS for making these recommendations.

03-01

PEPC Correspondence  
Keep Private: Yes  
Date Received: 12/2/12

The Rock Creek Park trail, particularly the area around the zoo, has needed improvement for many years now. Expanding the width of the trail should help accommodate the heavy use that it receives between the zoo and M St. I have used the trail at least 3 days per week since 2004 as both cyclist and runner, and have noted the increased traffic on it, including from pedestrians, cyclists, roller bladers and more. At the same time, the trail has gotten progressively worse, becoming increasingly uneven on account of trail roots, etc. Correspondingly, many of the professional and more competitive cyclists have taken to Rock Creek Park Road to avoid the uneven characteristics of the trail.

One other area which needs drastic improvement is increasing the width of the sidewalk through the tunnel by the zoo. The space is extremely narrow to traverse on bike when the zoo is closed, and the potential for cyclist-motor vehicle fatalities is very high.

Please consider adopting these improvements to Rock Creek Park Trail.

04-01

***Response to 03-01***

Thank you for your interest and response. Your comments will be included as part of the public record for the project. A purpose of the project is to improve visitor safety and experience.

***Response to 04-01***

The comment of widening the trail is consistent with the preferred alternative. Additionally, as described on page 29 of the EA, the sidewalk along the west wall of the Beach Drive tunnel is proposed to be widened from 2 feet to approximately 4 feet.



PEPC Correspondence  
Keep Private: No  
Name: Rumon V. Buzatov  
Address: 1530 Ogden Street, NW Washington DC, 20010  
Email: buzi@buzistudio.com  
Date Received: 12/3/11

I have felt the need to access Rock Creek Park via Piney Branch Parkway by foot or bicycle for long time. The current absence of a bike lane and especially a sidewalk, are major inconvenience for pedestrians and riders. The entrance on Arkansas Avenue, NW should also be connected to 16th Street, NW via bike lane and a sidewalk. Thank you for this long overdue initiative.

05-01

PEPC Correspondence  
Keep Private: No  
Name: Kenneth P. Cantor  
Address: 708 Bonifant st., Silver Spring MD, 20910  
Email: kencantor@earthlink.net  
Date Received: 12/3/11

As an occasional recreational bicycle user of the Rock Creek Trail, I strongly support the preferred alternative modifications to the trail. I am especially pleased that the section of the trail between Pierce Mill and Connecticut Ave. is to be improved. I often ride a loop South on Rock Creek Trail from East-West Highway in Silver Spring to K Street, DC, then ride over to the Crescent Trail, and on the Crescent Trail back to Jones Bridge Rd. where I pick up the Rock Creek Trail, going South to my origination point. In this full 20+ mile loop, by far the part of the Rock Creek Trail most difficult, challenging, and most dangerous to navigate is between Pierce Mill and Connecticut Ave. Improvements to this section of the trail are especially welcome.

I offer a suggestion that could possibly save some construction funds: My travel on the Rock Creek Trail is always during daylight hours, and I bypass the National Zoo tunnel by going around the hill through the Zoo, which of course is open during the hours when I typically travel the route. I understand that, at present, the Zoo gate at Rock Creek Parkway is closed after dark, making this travel option unavailable after sunset. Would it be possible to re-design the Zoo entrance, fencing, and trail route in this area to permit 24-hour travel around the tunnel but through Zoo property? This would avoid the necessity of redesigning and reconstructing the tunnel roadway and adjacent trail, which, no doubt, is one of the more expensive elements of this project.

06-01

Again, I am enthusiastic about the proposed improvements to the Rock Creek Park Trail and look forward to enjoying the rebuilt Trail. Congratulations and thanks to the NPS and all others involved.

K. Cantor

### ***Response to 05-01***

The preferred alternative would involve restriping of Piney Branch Parkway and widening of the Piney Branch Parkway trail to a width of six to eight feet. The proposed trail would include ADA-compliant ramps to connect the trail with Arkansas Avenue and the Rock Creek Park Multi-Use Trail. As described in Chapter I of the EA, the NEPA process involves public agency involvement early in the project development to identify the scope of issues to be addressed and the project area. Based on the early coordination and public outreach, connections to 16<sup>th</sup> Street, NW were determined to be outside of the scope of the trail rehabilitation.

### ***Response to 06-01***

As described on page 40 of the EA, National Zoo security requires this gate to be closed from dusk to dawn, and on days when the National Zoo holds special events. The gate and its scheduled closure are required in order for the National Zoo to maintain its accreditation by the Association of Zoos and Aquariums (AZA). The AZA standards specify a requirement for a perimeter fence. The fence must be constructed so that it protects the animals in the facility by restricting animals outside the facility and unauthorized persons from going through it or under it and having contact with the animals in the facility, and so that it can function as a secondary containment system for the animals in the facility (AZA 2013). As a result, leaving the National Zoo gate open was dismissed from the study.

PEPC Correspondence  
Keep Private: Yes  
Date Received: 12/4/11

Dear Sirs:

I strongly applaud the recommendations put forth in the EA for the Rock Creek Multi-use Trail Rehabilitation.

Three proposed actions recommended in the EA are crucially important:

1. the widening of the pedestrian/cyclist path in the tunnel located east of the zoo.
2. the new pedestrian/cyclist bridge proposed just south of the aforementioned tunnel.
3. widening of the path where feasible.

07-01

All three are essential for public safety. I have tried to ride (and then walked) my bike through the tunnel after the zoo path has been closed. It has been a frightening experience and I was surprised that bike riders were not killed.

The existing walkway on the bridge south of the tunnel is a serious accident waiting to happen. The new alternative will obviate this.

Finally, the overall widening of the path will allow better coexistence between walkers and cyclists.

I applaud the report for formulating these recommendations.

Sincerely,

PEPC Correspondence  
Keep Private: No  
Name: Scott A. Remley  
Address: 1662 Hobart St., NW Washington DC 20009  
Email: scott\_remley@yahoo.com  
Date Received: 12/5/11

I strongly support NPS' preferred alternative for the RCP trail, and applaud their diligent effort to accommodate stakeholders while remaining respectful of their mission to create a cohesive transportation plan and preserve open space for all members of the public to enjoy.

One suggestion would be to incorporate some kind of periodic reflective marker in the Rock Creek Park trail - cat-eyes every 20 yards, dashed line or something like that. In the dark, especially during the fall, it becomes very challenging to see the contours of the trail. An occasional marker would be very helpful, especially to cyclists like me.

08-01

***Response to 07-01***

Thank you for your interest and response. Your comments will be included as part of the public record for the project. A purpose of the project is to improve visitor safety and experience.

***Response to 08-01***

New lighting elements were considered by the project team but dismissed based on standard NPS policy. As described on page 41 of the EA, "Rock Creek Park is closed from dusk to dawn. Furthermore, according to NPS Management Policies (NPS 2006), the NPS seeks to preserve, to the greatest extent possible, the natural lightscapes of parks."

PEPC Correspondence  
Keep Private: No  
Name: Brian E. Moore  
Address: 6707 Rannoch Rd.  
Email: brianem@yahoo.com  
Date Received: 12/5/11

Thank you for considering improving the existing hike trail in Rock Creek park. However, the current trail is poorly suited for use by cyclists, either recreational or those attempting to commute to jobs by bicycle rather than car. The trail is poorly lit overall, has many twists, turns, blind spots, root-heaves, and worst of all soil overwashes from storm events. Even "spruced-up" as envisioned in this plan, it will remain poorly suited for anyone other than occasional recreational riders- and even then without dedicated maintenance, only until storm events start covering sections with slippery mud.

09-01

Rather than band-aid attention to the long neglected and inadequate hiking trail that runs through Rock Creek park I strongly urge you to consider permanently segregating, out of the existing 4 car lanes, a separate bike lane on the roadway.

09-02

Leave the remaining car lanes contraflow (that is all three in-bound in the mornings and out bound in the evenings.) The wildly successful beach drive weekend closures show how much interest there is in having a safe recreational and bicycle commuter route in the center of DC. Having a direct, suitable and safe bicycle alternative would serve many popular and important interests in the communities along and above Rock Creek Park.

PEPC Correspondence  
Keep Private: No  
Name: N/A  
Address: Washington DC, 20008  
Email:  
Date Received: 12/5/11

I am a frequent user of this trail. I am very pleased with the prospect of the trail repaving. It is not currently in good condition and is far too narrow in many sections, posing a major hazard to its many users.

10-01

I am concerned with the plan to fit the trail into the tunnel. While the proposed plan is certainly better than the status quo, a 5 foot trail is not wide enough for two way traffic. This is especially true when there will be a wall to one side and two way car traffic in narrow lanes to the other. My question is: why can the section of the trail through the zoo grounds not be open 24/7? I understand that the zoo grounds close in the evenings. Presumably a gate could be erected on the bridge on Jewett street, thereby eliminating after hours access to the zoo from the multi-use path. This way, the path could remain open and users can always bypass the tunnel. I believe this is a much safer option and I am confident that NPS can find a way to work with Smithsonian to make this happen if NPS finds it a compelling solution.

10-02

### ***Response to 09-01 and 10-01***

Trail rehabilitation design would be developed in accordance with standards provided in DDOT's *Bicycle Facility Design Guide*. Additional design guidance will be provided by AASHTO's *Guideline for the Development of Bicycle Facilities* and the Americans with Disabilities Act. To the extent feasible, the trail will be designed to avoid right angles and blind corners while protecting the Park's environmental resources. The preferred alternative would also include raising the vertical profile of the trail as necessary to eliminate ponding and slope stabilization to improve soil erosion conditions.

### ***Response to 09-02***

Retrofit of the existing roadways to include bike lanes would require a reduction in the number of lanes for vehicles, or widening of the road. Further, inclusion of bike lanes could result in conflicts between bicyclists and motorists. Based on these considerations, restriping the roadways to include bike lanes was determined to be outside of the scope of the trail rehabilitation.

### ***Response to 10-02***

As described on page 40 of the EA, National Zoo security requires this gate to be closed from dusk to dawn, and on days when the National Zoo holds special events. The gate and its scheduled closure are required in order for the National Zoo to maintain its accreditation by the Association of Zoos and Aquariums (AZA). The AZA standards specify a requirement for a perimeter fence. The fence must be constructed so that it protects the animals in the facility by restricting animals outside the facility and unauthorized persons from going through it or under it and having contact with the animals in the facility, and so that it can function as a secondary containment system for the animals in the

PEPC Correspondence  
Keep Private: Yes  
Date Received: 12/6/12

I use this area of the trail 3-4 times per week to run along and this proposed trail rehabilitation would be a great improvement on a heavily-used pedestrian and bicycle path. As the report details, the trail needs to be widened where possible for increased safety between pedestrians and bicyclists and the current segment from Beach St. up Piney Branch Ave. is treacherous at various points and needs a proper running trail.

11-01

PEPC Correspondence  
Keep Private: Yes  
Date Received: 12/7/11

I'm not opposed to improvements. The flooding on the path can get very bad around the basketball court, but I just hope these upgrades don't take forever to construct. This is an important thoroughfare for many people who work in Georgetown and if the path is closed for an extended period of time, then it could cause a major inconvenience.

12-01

facility (AZA 2013). As a result, leaving the National Zoo gate open was dismissed from the study.

The preferred alternative would widen the path to a four foot width. Due to the constraints of the tunnel, construction of a pathway greater than four feet wide would not be feasible. To enhance safety for trail users within the tunnel, trail user/vehicle separation structures such as railways or bollards would be constructed.

***Response to 11-01***

User safety is a key component of the project. The preferred alternative would include widening, trail user/vehicle separation structures, and roadway crossing safety improvements to promote safety.

***Response to 12-01***

During construction, the preferred alternative would include logical detours around trail segments and road areas under construction. The work would be completed in segments, with no two adjacent segments under construction simultaneously. Construction segments would be .25 to .50 miles in length. In advance of construction periods, trail users and drivers would be notified of closures or detours. Notifications could include electronic signage, postings to the Rock Creek Park and DDOT websites and social network pages, and email blasts to interested parties identified during the planning process.

PEPC Correspondence  
Keep Private: No  
Name: Jeffrey D. Kohn  
Address: 7391 Buffalo Ave., Takoma Park MD, 20912  
Email: jeffandsue@rcn.com  
Date Received: 12/9/11

I live in Takoma Park and commute via bike as often as I can to downtown, to constitution and 14th. While it is more direct to bike directly down 14th street, the bike lane is dangerous when you pass through columbia heights with it's crazy traffic and the bike lane is nonexistent downtown south of K street when I need it the most! Therefore, I go an extra 4 miles in my commute to travel through Rock Creek Park. It is far safer, with fewer opportunities to interact with car traffic. However, I don't enjoy the commute right now:

- 1. The trail is so pock-marked that I can't comfortably ride. 13-01
- 2. Riding down piney branch parkway is difficult and often dangerous because I have to ride on the road and traffic has to get around me. The small bit of paved trail is too discontinuous to want to use for the 30 seconds that it exists. 13-02
- 3. The bridge just south of the zoo tunnel is impossible to navigate for more than 1 person at a time. 13-03
- 4. The trail is too narrow at times to accommodate runners, walkers, and bikers. This is especially true of the zoo area. (I also agree with the report's issue with sight lines, but I manage this by going very slowly at key points in the trail.)

Alternative 1 is wrong wrong wrong. Even if you improve the smoothness of the trail, you only solve one of my pressing problems and I will still have a stressful commute. I am utterly against alternative 1 and I will fight hard to change the NPS minds if it goes through, including by getting my congressional members involved.

Alternative 2 is a massive improvement. It solves my issue with Piney Branch Parkway and the bridge over the water south of the zoo tunnel. However, it would not help with the multiple uses the trail sees and I have seen frustrated bikers use the road because they don't feel comfortable sharing the narrow trail. As I said before, this is most prevalent in the range of the zoo, but also from woodley south to P st.

I agree with the EA authors that Alternative 3 is the most people and environment friendly. It would transform our beautiful park into a destination for people to enjoy nature. Walkers would not need to be as constantly vigilant of bikers and runners. It would serve the park well for many years. 8 million seems like a lot, but given the possible ramifications and the additional number of people that I'm sure will flock to the new facilities, it doesn't seem like that much when viewed from a per capita utility basis.

Thanks and I hope you are able to get started very soon. The current trail is in really sad shape and I would love to continue to use it again very soon!

Jeff Kohn

### ***Response to 13-01 and 13-03***

The preferred alternative involves the resurfacing of the trail, which would result in a smoother riding surface for users. Proposed rehabilitation of the trail would include widening of the Piney Branch Parkway trail to 6- to 8-foot widths, and widening of the Rock Creek Park Multi-Use Trail to 6 to 10 foot widths, depending on environmental and physical constraints.

### ***Response to 13-02***

The preferred alternative includes a new bridge to accommodate trail users. As described on page 29 of the EA, the proposed structure would allow for a 10-foot trail clearance and would be constructed within 5 feet of the existing bridge abutment.

PEPC Correspondence  
Keep Private: Yes  
Date Received: 12/14/11

It is very good to learn that this work on the Rock Creek Park trail may soon actually begin after years and years of discussion as the trail disintegrates and its use increases exponentially.

Your website on which this response appears lacks both the entire environmental impact report describing exactly what is to be done and a map, so I cannot comment on the details of the proposed work.

14-01

However, the ENTIRE trail on which I bike from Nevada Avenue to the Watergate needs work. It is dangerously narrow, the surface is rough, pitted and the edges often crumble and it is too winding with blind curves.

14-02

But the two most dangerous parts of the trail which I use are (1) the one mile stretch from Nevada Avenue to Pierce Mill, where trail users and cars use the same narrow, curving roadway which lacks shoulders, and (2) the bridge over Rock Creek just south of the Zoo which bikes must cross on a very narrow sidewalk.

14-03

I look forward to a rapid beginning of the work to be done.

### ***Response to 14-01***

The EA can be found on the NPS Planning, Environment, and Public Comment website found here:

<http://parkplanning.nps.gov/RockCreekTrailRehab>

Once at the site, click the "Document List" link on the left side of the page under "Project Links". Several downloadable documents are provided including project mapping and a copy of the EA.

### ***Response to 14-02***

Trail rehabilitation design will be developed in accordance with standards provided in DDOT's *Bicycle Facility Design Guide*. Additional design guidance will be provided by AASHTO's *Guideline for the Development of Bicycle Facilities* and the Americans with Disabilities Act. To the extent feasible, the trail will be designed to avoid right angles and blind corners while protecting the Park's environmental resources.

### ***Response to 14-03***

As described in Chapter 1 of the EA, the NEPA process involves public agency involvement early in the project development to identify the scope of issues to be addressed and the project area. Based on the early coordination and public outreach, trail segments north of the intersection of Broad Branch Road and Beach Drive were determined to be outside of the scope of the trail rehabilitation. From Peirce Mill to Broad Branch Road, the existing trail would be widened from 6- to 10 feet based on physical and environmental constraints. Also, a social trail between the Peirce Mill parking area and the Broad Branch/Grove 2 North parking area would be paved. Just south of the zoo, a new bridge is proposed which would accommodate trail users. As described on page 29 of the



ENVIRONMENTAL ASSESSMENT AND SECTION 106 EVALUATION  
PUBLIC HEARING – MEETING #2  
DECEMBER 14, 2011

COMMENT FORM

Thank you for participating in tonight's meeting. The project team value your feedback in planning the Rock Creek Trail Rehabilitation, and would like to capture as much of your input as possible. Please write your comments and questions below, and leave your form in the comment box. You can also submit comments electronically at the National Park Service's Planning Environment, and Public Comment website (<http://parkplanning.nps.gov/RockCreekTrailRehab>).

I am encouraged that NPS is finally looking at widening Rock Creek Park Trail and paths into the park. The trail is heavily used and is much too narrow for the volume of cyclists, runners, walkers, etc who use the trail. To ~~definitely~~ <sup>avoid</sup> the trail would be 10 ft wide, would impinge on the roadway (effectively a super highway for commuters) where more real-estate is needed. Nonetheless, even getting NPS to talk about widening the trail is far more than we've gotten out of NPS for decades. Widen as much as possible wherever you can. Maintain the trail. Design the trail to avoid the right angles and blind corners. my preference w/ proposed alternatives  
Alternative 3 repave  
Option B Pierce Mill  
Option C Rose Park

PM-01

PM-02

EA, the proposed structure would allow for a 10-foot trail clearance and would be constructed within 5 feet of the existing bridge abutment.

**Response to PM-01**

Thank you for your interest and response. Your comments will be included as part of the public record for the project.

**Response to PM-02**

Trail rehabilitation design will be developed in accordance with standards provided in DDOT's *Bicycle Facility Design Guide*. Additional design guidance will be provided by AASHTO's *Guideline for the Development of Bicycle Facilities* and the Americans with Disabilities Act. To the extent feasible, the trail will be designed to avoid right angles and blind corners while protecting the Park's environmental resources.

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Rock Creek Park Trail Rehab. Meeting 12-14-2011

PROCEEDINGS

1  
2 MS. CASEY: Good evening. My name is Austina  
3 Casey and this is the meeting on the Rock Creek Park  
4 Multi-Use Rehabilitation and we're also doing a Section  
5 106 evaluation as part of the EA. So when you comment,  
6 please make sure you comment on that as well.

7 The purpose of tonight's meeting is to give  
8 you an opportunity to comment on the proposed action  
9 and the alternatives that are in the EA, as well as the  
10 Section 106 evaluation that's also present in the EA.

11 This evening's meeting is presented in two  
12 parts, where we first have an Open House. Hopefully  
13 you've had the chance to look at the boards that talk  
14 about or describes the alternatives, our purpose and  
15 our need for the project and it kind of guides you  
16 through what you would find in the EA.

17 The EA was released on December 2nd. So if  
18 you haven't had a chance to get a copy of it, it's on  
19 the website that's listed on the paper. After my  
20 presentation, we will have the formal comment period.  
21 If you want to leave a comment in front of everyone,  
22 then please make sure you register at the front desk:

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1 Everybody's comment is limited to two minutes.

2 If you don't feel comfortable commenting on  
3 the mic tonight, there are several other ways to  
4 comment. You can fill out a form. I believe we have  
5 some out front. You can visit the website and post  
6 comments there. You can talk to the court reporter who  
7 is out in the hallway, or you can mail your comment to  
8 our offices.

9 The comment period ends on January 13, 2012.  
10 If anyone received the EA, we made a slight error in  
11 the date, but I'm sure everybody understood what we  
12 were trying to say. I apologize for that.

13 Let me give you some project background. The  
14 reason why we're going through this NEPA process is  
15 because the construction, the EA, and the design will  
16 be federally funded. NPS and FHWA are the federal  
17 agencies, lead agencies that are proposing to  
18 rehabilitate the Rock Creek Park Multi-Use Trail.

19 The project area involves 3.7-mile segment of  
20 the Rock Creek Park Multi-Use Trail from Broad Branch  
21 Road to F Street in Northwest, and .8-mile segment of  
22 Piney Branch Parkway trail from Beach Drive to Arkansas

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1 Avenue, Northwest; .2 section of a social trail from  
2 Broad Branch Road to Peirce Mill, which we are  
3 referring to as the Peirce Mill Trail Spur in the EA,  
4 and then, of course, .5 segment of the trail from P  
5 Street to M Street, Northwest.

6           The proposed action includes resurfacing,  
7 trail widening, where it will be environmentally  
8 feasible; modification to the trail alignment and road  
9 crossings. We will put up a directional and  
10 interpretive signage and have connections to and from  
11 the trails for pedestrians and bicycle facilities in  
12 the area.

13           The majority of the proposed improvement is  
14 located on NPS's land, and that's why they're one of  
15 the lead agencies that's playing a big part of it.  
16 There will be some improvement within DDOT's right-of-  
17 way. A segment of the trail also passes through the  
18 National Zoo, for those of you who are familiar with  
19 it.

20           The purpose of the trail is to improve the  
21 overall condition and connectivity of the deteriorating  
22 Rock Creek Trail in order to enhance visitor use and

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1 the experience within Rock Creek Park. The purpose of  
2 project is to address the specific issues, including  
3 safety, as some of the trails current width may not  
4 meet certain safety standards. The issues that created  
5 the need for this project were soil compaction and  
6 erosion and vegetation damage in the area, because of  
7 deterioration of pavement along the social trails that  
8 have been formed as well.

9 Also, we wanted to make sure that we have  
10 consistent connectivity; pavement gaps to be repaired  
11 and the lack of access to Rock Creek Park was the  
12 determining factor for the system that we're trying to  
13 achieve. Also, we want to improve visitor use and  
14 experience. We want to support the current diverse  
15 users that are currently using the trail, including  
16 walkers, runners, and bicyclists so that they can  
17 continue to enjoy the trail and not stop using it.

18 This is where we are in the NEPA process. We  
19 initiated the project. Another slide will give you  
20 some dates linked to these, but basically we've gone  
21 through all of that and right now we are at the public  
22 review of the EA.

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1 Again, the comment period ends January 13,  
2 2012. So as much as you can, provide us with feedback  
3 on what you think of the assessment in the EA to make a  
4 final documentation. We would really appreciate that.  
5 If nothing major comes up, no significant impacts, then  
6 we will produce a finding of No Significant Impact, in  
7 addition to the final EA.

8 As I mentioned before, we're also doing a  
9 Section 106 evaluation as part of this, under the  
10 requirement of the National Historic Preservation Act.  
11 We consulted with D.C. HPO on October 19th. We got a  
12 concurrent with a finding of no adverse affect, which  
13 is also the assessment -- it's in the appendix in the  
14 EA. So that's the document. If you want to comment on  
15 Section 106, that's the document you want to focus on.

16 Archeological surveys will be conducted in  
17 all areas of disturbance that have not been previously  
18 surveyed as we go through the construction. Consulting  
19 parties, which we've sent letters to -- or if any of  
20 you are here, if you wish to comment on the finding of  
21 no adverse affect, you can do so.

22 In the EA, these were the alternatives and

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1 options that we analyzed. For the Rock Creek Multi-Use  
2 Trail, we looked at no action, which is a requirement  
3 for NEPA. Alternative 3 was resurfacing the trail.  
4 Alternative 3 was resurfacing the trail and widening in  
5 parts where it's needed.

6 For the Peirce Mill Spur option, we looked at  
7 two options: no action and widening two eight-foot  
8 paved trails. For the Rose Park Trail option, we  
9 looked at three: no action, six feet or eight feet.  
10 We also looked at alternatives, but because of several  
11 reasons, as discussed in the EA, they were dismissed  
12 right off the bat. They didn't go through the entire  
13 analysis, and these include making a continuous 10-foot  
14 trail throughout the Rock Creek Park trail. This was  
15 dismissed because of resource impact. There would be  
16 areas where there would be a tree, and we didn't want  
17 to have to cut down a tree to get a 10-foot trail going  
18 through.

19 We also looked a continuous eight-foot paved  
20 trail with two feet of soft shoulders. Again, that was  
21 dismissed for the same reason. We looked at  
22 rehabilitating Rose Park trail to its current width,

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1 which we dismissed that because of the narrowness of  
2 that trail. Also, when you go out and look at the  
3 trail, you can see that because of its current width,  
4 people would have to use the side of it and kind of  
5 compact the side of it. So it seemed that some things  
6 had to be wider than some areas.

7           Also, from comments that came in on the draft  
8 -- I'm sorry. -- during the public scoping period back  
9 in February, a lot of commenters voiced a concern about  
10 going through the zoo and was asking if we would have  
11 the zoo gate opened at all times so that they wouldn't  
12 have to have that closed off. In speaking to zoo  
13 personnel, we found out that we couldn't look at that  
14 option. So because of safety reasons concerning the  
15 animals, they have a certain level of protection they  
16 have to adhere to.

17           Another thing we looked at was Beach Drive  
18 Bridge over Rock Creek. We were looking at putting a  
19 (inaudible) to expand the width for the trail of that  
20 bridge, but because of the structural integrity of  
21 drilling into the bridge, we didn't know if that would  
22 -- we were concerned about the safety of the bridge if

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1 we go through that. So we came up with another  
2 alternative, which we discussed in the EA.

3 UNIDENTIFIED SPEAKER: Can I just ask? Which  
4 location of that bridge are you talking about?

5 Beach Drive crosses the creek in a number of  
6 places.

7 MR. WISER: Just south of the zoo tunnel.

8 MS. CASEY: Yeah. Thanks. Of course, we  
9 looked at other options that had to deal with the main  
10 connection, like curb streets, lighting options,  
11 bicycle parking. I mean, bicycle parking is not really  
12 a dismissed option because, you know, it's always  
13 available and we will always make sure we have parking  
14 available for bicycles, but it didn't require a  
15 detailed analysis in the EA. So that's why we had that  
16 on there.

17 We had a list of options that were common to  
18 all alternatives, regardless of the -- the build  
19 alternative, not the no action alternative. So  
20 regardless of which ones are chosen, we will still do  
21 these, and that includes several new connections and  
22 several spot improvements, including separating trail-

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1 users and vehicles, roadway crossing safety improvement  
2 and drainage and slope stabilization, et cetera. Those  
3 things were underlying issues that regardless of what  
4 we do, we need to do those in order to fulfill the  
5 trail sustainability, I guess.

6 In discussions with NPS and FHWA, the third  
7 alternative that we came up with in the EA for the  
8 trail was Alternative 3, which includes resurfacing and  
9 widening where appropriate. We will go from a minimum  
10 of six feet in certain places to 10 feet in others.  
11 Piney Branch Trail will be resurfaced from six to eight  
12 feet.

13 For Peirce Mill, we went with Option B.  
14 Right now we have eight to 10 feet of what we're  
15 calling social trail issues where the soil has been  
16 compacted and people just naturally use at this point.  
17 Our plan is to go to eight feet for that trail.

18 For the Rose Park option, the existing  
19 condition of the trail between P Street and M Street  
20 are narrow, five to six feet. In some cases they were  
21 less than five feet. So we decided, as I mentioned  
22 earlier, it has compacted soil. It shows that people



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1 have been using it in order to pass or for whatever  
2 reason. It has been compacted six feet. So we're  
3 going to that width for that trail.

4 In the EA, these were the topics we analyzed.  
5 Of course, we looked at soil, water quality, the three  
6 Section 106 topics there: historical  
7 structures in district, cultural landscaping and  
8 archeology. We looked at human health and safety, park  
9 operations and of course, traffic and transportation.

10 There's a board out there that kind of summarizes what  
11 the impacts are and they are detailed, obviously, in  
12 the EA. We welcome your comments on all of those.

13 The next step, as I said, this slide has the  
14 dates. As you can see it's been over a year we've been  
15 working on this and we are happy to be at this point.  
16 We are very close to completing the NEPA process. So  
17 with the public hearing today, we hope to get all of  
18 your comments in by January 13th and then we will  
19 incorporate them. If we need to reevaluate our  
20 analysis based on major revelations, then we will do  
21 so, but we hope to have, you know, if we don't have  
22 anything, if there are no major issues that come up, we

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1 will then release -- well, we hope that Federal Highway  
2 and NPS will agree to a finding of no significant  
3 impact. The federal agencies have then look at the  
4 final analysis and all of the comments that have come  
5 in and then make that determination. DDOT will then  
6 publish that. We're hoping to do that in early 2012.  
7 So we appreciate you getting in your comments to  
8 facilitate that.

9 Well, that's it. I guess we can begin the  
10 comment section. John is going to give some ground  
11 rules and then we'll start. Thank you.

12 MR. WISER: Thank you, Austin. Just one  
13 point of clarification -- and Tina, correct me if I'm  
14 wrong -- this is a hybrid process, working with Federal  
15 Highway and the National Park Service. The next  
16 document will be a finding of no significant impact,  
17 which will address your comments. Hopefully, we're  
18 going to do a final EA. The typical process -- because  
19 this is a joint effort, the document was actually  
20 prepared in both Federal Highway and Park Service  
21 formats. I just want a point of clarification.

22 MS. CASEY: Yes, that's correct.

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1 MS. WISER: Okay. At this point, we're going  
2 to start our public comment session. I'm just going to  
3 explain some ground rules.

4 First off, with the mics, you got to get real  
5 close to them to be able to hear. Prior to the start  
6 of the oral comment period for the hearing, DDOT would  
7 like to review some general guidelines for the conduct  
8 at the hearing.

9 We want to emphasize that the public hearing  
10 is an opportunity for the public to provide oral  
11 comments about the project, the environmental  
12 assessment, which will aide our project team, both the  
13 Park Service that's here tonight, Federal Highway and  
14 DDOT in the planning process of this project.

15 I'm going to explain how it works. All  
16 individuals who wish to speak have registered, using  
17 the sheet that was made available at the welcome  
18 station. If you would now like to speak and you  
19 haven't signed up, we can sign you up.

20 Each speaker will be allowed two minutes to  
21 state their views and ideas about the project. I'll  
22 give you a little heads-up when you have 10 seconds

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1 left so you can close. Speakers should come to the  
2 microphone to speak. Speakers are requested to speak  
3 into the microphone and give your name and address  
4 before giving your comment. Please keep your comments  
5 short and avoid repetition of what other speakers have  
6 said. Each individual may speak only once at the  
7 hearing.

8           DDOT will take all comments into  
9 consideration in the next part of this process, which  
10 is developing the finding of no adverse affect, if  
11 that's applicable. Typically, the response to comments  
12 is provided in that document. DDOT will accept  
13 comments in writing as well, up until the end of the  
14 comment period.

15           General rules for the conduct of the hearing,  
16 please be considerate to your fellow speakers. There  
17 should be no applause, booing or other audible  
18 disruptions during the hearing. All comments should be  
19 directed to DDOT and Federal Highway, not to the  
20 audience or an individual. Note that this is a public  
21 hearing and not a debate.

22           Lastly, DDOT will not tolerate personal

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1 attacks by anyone or any participants in the  
2 proceedings. Anyone who violates that guideline will  
3 be asked to leave.

4 With that said, we'd like to thank you for  
5 taking the time to come here tonight, providing us with  
6 your comments because it does help us in developing the  
7 best project we can.

8 I'm going to call an individual down to make  
9 their comment. We do have a clock up here with the two  
10 minutes. Please speak directly into the microphone.

11 The first commenter is Shalom Flank.

12 MR. FLANK: Good evening. I'm Shalom Flank.  
13 I live in Woodley Park. I thank you for an excellent  
14 job on the draft EA. It's thorough and professional.  
15 I strongly support the finding of no significant impact  
16 in the Section 106, no adverse affect.

17 I strongly support Alternative 3, including  
18 the occasional narrowing of the trail to avoid cutting  
19 down the trees. I would ask again that you look at a  
20 staircase from the Harvard Street Bridge. I support  
21 Option A for the Peirce Mill Trail Spur, and Option B  
22 or C for Rose Park.

PM-  
03

***Response to PM-03***

Construction of a Harvard Street Bridge staircase could result in adverse impacts to soils and vegetation, historic structures, cultural landscapes, aesthetics and viewsheds. In addition, the proposed staircase could require mitigative measures to attain ADA compliance. Based on these considerations, construction of the staircase was determined to be outside of the scope of the trail rehabilitation.

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1 Rose Park, which I think is a very minor part  
2 of this wonderful project, I would suggest that one way  
3 to reduce the conflict between different kinds of users  
4 is to make it easier for cyclists to access the main  
5 Rock Creek trail to the south of Rose Park, not just  
6 connections to M Street, but all the way across  
7 Pennsylvania Avenue to the entrance to the trail. I  
8 believe that that can be done with dedicated bicycle  
9 signals that would not add any new cycle stopping  
10 traffic on M or Pennsylvania if the timing is  
11 coordinated with the existing traffic lights; some new  
12 curb cuts and painted lines and those dedicated traffic  
13 signals, would make it much easier for cyclists to  
14 enter the main trail and not have to use the Rose Park  
15 Spur as much. Thank you.

PM-  
04

16 MR. WISER: Thank you. Jeanie Osburn.

17 MS. OSBURN: My name is Jeanie Osburn. I  
18 live at 207 S Street, Northwest, which is in Ward 5. I  
19 am on the D.C. Bicycle Advisory Council, as a  
20 representative from Ward 5, and I'm also the Chair of  
21 the Facilities Committee for D.C. Bicycle Advisory  
22 Council. I would like to say that I really appreciate

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***Response to PM-04***

As described in Chapter 1 of the EA, the NEPA process involves public agency involvement early in the project development to identify the scope of issues to be addressed and project area. Based on the early coordination and public outreach, new connections to the Rock Creek trail south of Rose Park and dedicated bicycle signals were determined to be outside of the scope of the trail rehabilitation.

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1 DDOT and the Park Service working together to improve  
2 the conditions of the trail. We've long-needed a  
3 better access to the Rock Creek Park trail. We've  
4 needed the trails to be improved, widened and  
5 maintained appropriately so that people can enjoy and  
6 use it.

7 I would encourage the Park Service and DDOT  
8 to widen, wherever possible. I'm thoroughly delighted  
9 about it being 10-feet wide, wherever possible. I  
10 would encourage Alternative 3, obviously. I would  
11 encourage you to use Option B for the Peirce Mill  
12 trail, which is the eight-foot wide trail, and I would  
13 encourage Option C for Rose Park.

14 Again, it's a long time coming for widening  
15 the trail and the bicycle community is very, very  
16 delighted to be able to use the park safely and get rid  
17 of a lot of those kinks and 90-degree angles and blind  
18 curves and things like that. This way we can ride  
19 safely and enjoy nature with everyone else. Thank you.

20 MR. WISER: Doug Guarino. Is that right?

21 MR. GUARINO: It was pretty close. My name  
22 is Doug Guarino. I've lived in Mount Pleasant for

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1 about five and a half years. I frequently use the bike  
2 trail, both to commute to my office in Arlington and  
3 also for exercise.

4 I am particularly appreciative of how  
5 important some of these safety improvements are, as I  
6 unfortunately spent some time in the hospital as a  
7 result of a bike accident that occurred on the trail.  
8 I just wanted to quickly point out a few things that I  
9 think are particularly important.

10 First, the general widening and resurfacing  
11 of the trail is just really important, particularly  
12 during the evening rush when you have a lot of two-way  
13 traffic with bikers and runners, you know, there have  
14 been a lot of really rough spots with the trail being  
15 narrow. It can be very difficult to avoid collisions  
16 and obstacles with other people.

PM-  
05

17 The issue with the zoo gate and the Beach  
18 Drive Tunnel, it is true that the current path for  
19 cyclists and pedestrians through the tunnel when the  
20 zoo is closed is really dangerously narrow and the plan  
21 to widen that and to create some sort of a barrier  
22 between the cats and bikes/pedestrians should be really

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***Response to PM-05***

Trail usage was a consideration during planning phases for rehabilitation of the trail. Proposed trail widths were established based on trail criteria established by AASHTO, DDOT and NPS, analysis of public comments, and physical and environmental constraints.



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1 good.

2 Related to that, just south of there, the

3 Beach Drive Bridge over Rock Creek that was mentioned

4 earlier, I find this to be probably one of the most

5 dangerous points on the path. If you're coming

6 southbound through the zoo property, you have to make

7 this really sharp right-hand turn onto this very narrow

8 sidewalk/ledge, if you want to call it. Basically, if

9 you make one false move, you're going to end up falling

10 into the road, which is very busy with traffic during

11 rush hour. So basically, you can get run over by a

12 car. This problem is further exacerbated by the fact

13 that in that area it's very difficult to both see other

14 people coming at you and --

15 MR. WISER: Ten seconds.

16 MR. GUARINO: -- to pass them. Some people

17 are courteous and just wait for people to pass, but

18 others will just force and push you out of the way.

19 In short, the proposed construction of the

20 separate bridge for bikes and pedestrians would really

21 be a great addition. Thanks.

22 MR. WISER: Thank you. David Abrahams.

PM-  
06

***Response to PM-06***

The preferred alternative includes a new bridge to accommodate trail users. As described on page 29 of the EA, the proposed structure would be 12 feet wide, allowing for a 10-foot trail clearanc. In addition, the amount of paved areas at the southbound end of the Beach Drive tunnel would be expanded to tie into the new bridge.

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1 MR. ABRAHAMS: Hi. Good evening. My name is  
2 David Abrahams. I live at 1410 26th Street, Northwest.  
3 I'm here tonight representing Friends of Rose Park, a  
4 501(c)(3) tax-exempt organization, recognized by our  
5 ANC 2E as the official community representative for  
6 issues of concern to the park. I'm here to address  
7 only issues related to the Rose Park portion of this  
8 project.

9 We will be submitting extensive written  
10 comment in regard to Rose Park Options B and C  
11 presented in the EA. I wanted to point out tonight  
12 three glaring points where the areas of health and  
13 human safety and vegetation are involved. The authors  
14 of the EA do not address the issues of critical  
15 importance which results in the EA's failure to measure  
16 up to NEPA.

17 First, the EA neglects the fact that one-  
18 third of the path directly abuts three distinct  
19 playground areas. Hundreds of toddlers and small  
20 children a week travel between these three play areas.  
21 If the EA fails to address the real safety issue that  
22 widening the path to six or eight feet will

PM-  
07

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**Response to PM-07**

For further clarification on potential conflicts between pedestrians and bicyclists, a synopsis of *Multiple Use Trails: Synthesis of the Literature and State of the Practice* was added to the human health and safety analysis in Chapter 4 of the EA. Under the preferred alternative, trail widths in Rose Park would generally remain the same, with zero to two-foot increases. The new trail surface could further promote use of the trail. However, the added use would not have a noticeable increase in the risk of unsafe conflicts for trail users, and any added risk would be offset by the improved trail conditions.

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1 dramatically increase the speed and resulting negligent  
2 operation of bicycles raising their newly created  
3 super-highway, narrowly funneled through these three  
4 play areas. This omission is glaring because of the  
5 fact that the authors of the EA received numerous  
6 written comments regarding this safety issue.

7 Second, there is a venerable old oak tree  
8 cited in the Dumbarton Street lot, directly  
9 abutting the path. Although the EA specifically states  
10 that no tree will be disturbed, there's no mention as  
11 to how the root system of this one tree will be safe  
12 from damage.

13 Third, significant water pooling and flooding  
14 occurs in three areas of the path and it is not  
15 mentioned at all in the EA. We look forward to  
16 reviewing a revised version of the EA which  
17 incorporates these legitimate safety issues. We also  
18 look forward to NPS keeping the written promises made  
19 to the neighborhood by Director Stanton and for former  
20 Superintendent Coleman that the path will remain in its  
21 current location and at its current width. Thank you.

22 MK. WISER: Harold Fuller-Bennett.

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PM-07

PM-08

PM-09

***Response to PM-08***

As stated on page 38 and within Chapter 4 of the Final EA, protection measures and BMPs would be implemented to avoid impacts to all types of park vegetation to the extent possible. Vegetation protection measures for the oak tree near the Dumbarton Street playground area may include development of a tree save plan by an arborist or licensed tree expert, or installation of tree protection fencing. Impacts to the tree's root system would be avoided to the extent possible. If necessary, alternative trail materials and/or narrowing of the trail would be utilized to preserve the tree's roots.

***Response to PM-09***

Based on comments received from the Friends of Rose Park and others, the project team conducted several field visits to evaluate drainage concerns at Rose Park and other locations in the project area. During the detailed design phase of the project, flood prone areas would be addressed. Although flood prone areas were not specifically noted in the EA, it is a purpose of the project to install more effective drainage and erosion control. Drainage designs throughout the project would be prepared in coordination with DDOE and in accordance with DDOT Design Manual requirements.

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1 MR. FULLER-BENNETT: Hello. My name is  
2 Harold Fuller-Bennett. I live at 2456 28th Street,  
3 Northwest, right next to the Duke Ellington Bridge that  
4 goes over Rock Creek in the Rock Creek Trail.

5 I'm in full support of the preferred  
6 alternative. As a resident of D.C. and a frequent user  
7 of the trail, I have often been frustrated by the poor  
8 condition and narrow track of the trail. Due to its  
9 location, it has the potential to be a major corridor  
10 for both recreation and travel by bicycle or on foot,  
11 and it simply does not serve that purpose right now.

12 The widening and resurfacing of the Rock  
13 Creek Trail is an excellent idea. Thank you to all  
14 involved.

15 MR. WISER: Thank you. Was there anybody  
16 else who did not sign up that hasn't already come to  
17 the podium to make a comment that wanted to speak?

18 Okay. Well, that concludes the comment  
19 session. Tina, do you want to say a few closing  
20 remarks?

21 MS. CASEY: I guess we can stick around until  
22 8:00 since we have it advertised, in order to give

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1 people an opportunity to come in and make comments if  
2 they wish.

3           Again, if anyone who has not had a chance to  
4 speak and wants to do so or want to leave a written  
5 comment, you know, every comment or insight you have is  
6 welcomed and appreciated. As I shared before, this is  
7 a process we've been through and our next step is to  
8 hopefully get a FONSI, and then that would conclude the  
9 NEPA process.

10           Again, thank you for coming. We will keep  
11 you informed. We'll have the information on the  
12 website for you to review.

13                       (Whereupon, at 7:04 p.m., the  
14                       proceedings were concluded.)

15  
16  
17  
18  
19  
20  
21  
22

PEPC Correspondence  
Keep Private: No  
Name: Philip L. McClain  
Address: 1728 Poplar Lane, NW Washington DC, 20012  
Email: pmclain@starpower.net  
Date Received: 12/17/11

I was very glad to learn that the much needed repairs and upgrades to this section of trail is, hopefully, to become reality. Since I have used this area of trail since 1974, the maintenance has been steady looking. It would be good to have an ONGOING maintenance to our trails in RCP after initial construction projects have been completed.

15-01

Thank you,  
Philip McClain

PEPC Correspondence  
Keep Private: No  
Name: Roberta Carroll  
Address: 3514 Yuma St., NW Washington DC, 20008  
Email: carrollbb@verizon.net  
Date Received: 12/19/11

On Page 29 you refer to a "restoration of the Klingle Valley Trail" which is completely wrong. There is a road, called Klingle Road, that has been open for over 100 years and has never been a trail. It remains to be decided if DC will waste 7 million dollars on a proposed trail or rebuild the road. Either way trucks and emergency vehicles will be using it, so to call it a trail is not accurate. You need to change the language on this page and call it a road that bikes will use.

16-01

***Response to 15-01***

Long-term maintenance of the trail will be conducted by NPS. Rehabilitation of the trail would address current and future maintenance needs such as trail patching and sediment and debris removal.

***Response to 16-01***

A Finding of No Significant Impact (FONSI) for the construction of a multi-use trail facility within the barricaded portion of Klingle Road was published in 2011. The Klingle Valley Trail project would create connectivity in the District of Columbia trail network by connecting Rock Creek Trail to the Klingle Valley Trail.

RECEIVED DEC 23 2011

Barbara L. Bryant  
1530 26<sup>th</sup> Street, NW  
Washington, D.C. 20007  
202-316-5521  
BryantandAssociates@Juno.com

December 19, 2011

Mr. Terry Bellamy  
Director, DC Department of Transportation  
55 M Street, S.E., Suite 500  
Washington, D.C. 20003

Dear Director Bellamy:

I am a 37 year resident of the District of Columbia, residing in the neighborhood adjacent to Rose Park. Rose Park is one of our city's treasures. Its usage is primarily for quiet enjoyment and foot traffic; i.e., children, families, downtown workers, and the elderly, for relaxation and the opportunity to walk safely, away from traffic and hazards, in an arcadian, serene environment.

Today, I am writing to you to plead for this pleasant bucolic scene to continue and express my support for the position taken for more than a decade by Friends of Rose Park: Keep the pedestrian path; which runs the length of Rose Park, at its current width and in its current location.

For many years, our neighborhood has been promised by the National Park Service, that the path through Rose Park would be rehabilitated; remain in its current location; and, at its current width. My utmost concern is that a wider path will result in danger and a safety hazard to the many little children and toddlers who travel between the Park's several play areas; and to elderly citizens such as me; who walk along its path at any given time.

17-01

The initial draft of the Environmental Assessment; issued by DDOT and FHA, fails to address the major safety issues to pedestrians, should the path be widened to 6 or 8 feet. Please know how difficult it is for me, and others who walk slowly, to react quickly. We simply cannot get out of the way fast enough for the bike riders.

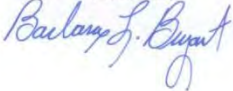
17-02

My strong interest and concern is also for the vegetation, beautiful plantings, tree root systems and ground cover through-out the Park which would be limited in receiving adequate rainwater and groundwater seepage (as it all does now), should a larger area of bare ground become covered by a non-permeable, asphaltic surface.

17-03

Respectfully, I request you to please not place any additional pavement and destroy what little green space we have in the city. Please consider the safety, well being and enjoyment we have been promised and maintain the pathway at its current location and width.

Respectfully submitted,



### ***Response to 17-01 and 17-02***

Original correspondence with the NPS indicated the trail would not be widened. NPS also stated the use of the trail would not be restricted. Subsequently, NPS and DDOT determined that trail widening was necessary based on field observation and trail counts in order to accommodate all users. As a compromise, NPS and DDOT decided an approximate zero to two-foot widening of the trail would resolve concerns. The current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail will accommodate the multiple user types of the path in a safe manner. In a letter dated August 24, 2011, NPS selected Rose Park Option B (six-foot resurfaced trail).

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA. Trail widening and a smoother surface could further promote use of the Rose Park trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added and raise safety awareness. To address potential conflict between trail users and park users in the Rose Park area, additional analysis was added to the EA under Human Health and Safety in Chapter 4.

### ***Response to 17-03***

Measures to protect vegetation throughout the entire project area including Rose Park are described on page 38 of the EA and include



From: sflank@gmail.com [mailto:sflank@gmail.com] On Behalf Of S. Flank  
Sent: Monday, December 19, 2011 2:43 PM  
To: HATAMI, Caesar  
Subject: Rock Creek EA

Dear Mr. Hatami,

Thank you for your excellent work on the Rock Creek Trail EA, and for speaking with me at the public hearing last week. As you suggested, I'm passing along a few comments that may be helpful as you wrap up this phase of the project. I will be submitting most of these as public comments, but thought they may be useful for you to have directly. I also still intend to send you the pointers I mentioned, for alternative standards to rely on (other than AASHTO) for designing more bicycle-friendly intersections.

First, in the Shoreham drive area (Fig 14 in the EA): That crossing has already been substantially changed by the current construction project, and more changes are planned. So you may want to talk to the folks there, both to update your drawings or recommendations, and to take advantage of this opportunity to put some of the recommended changes into place essentially immediately. The EA also omitted any discussion of the trail spur onto Cathedral Ave. As with the Broad Branch crossings, a "T" intersection should definitely be avoided. My understanding is that DDOT has added that location to their 2012 list of bike-line additions, so it's all the more urgent to get these pieces coordinated. Finally, there is a nearby spot where significant and ongoing ponding occurs, which I didn't see mentioned in the EA -- as the trail descends Shoreham Hill and crosses the bridge over Rock Creek, maybe another 100 feet downstream (just before the trail becomes immediately adjacent to the Parkway).

18-01

We didn't discuss it at the hearing last week, but a curb cut from Kingle Rd. is clearly needed, right at the bridge where the trail crosses over Rock Creek (the bridge that's pictured on the front cover of the EA). I know you want to avoid getting roped into any debates about the Kingle Valley trail, but the connection from the road to the Rock Creek trail there is obvious, regardless of the eventual Kingle trail design. I was also wondering if the team had given any consideration at all to how cyclists are expected to travel East on Porter St from Cleveland Park and then get onto the Rock Creek trail -- it's currently just about impossible to do both safely and legally. Trying to make the left turn at the bottom of the valley is quite dangerous; whereas the safer route, making the almost-U turn to the right (onto the Kingle Rd. entrance ramp), is against the legal traffic flow.

18-02

18-03

18-04

18-05

Finally, I will try to find you the appropriate references / authorities that would support a better Beach Drive intersection on the north side of Broad Branch, one which doesn't require cyclists to come to do a dead stop in order to continue "straight".

Good luck with completing the EA process, and let me know if there's anything else that would be helpful.

Thanks,  
--Shalom Flank

evaluation of large trees and development of a tree save plan by an arborist or licensed tree expert. Along the Rose Park trail, the proposed zero to two-foot widening would not have appreciable effects on vegetation or ground water seepage. The existing narrow width of the Rose Park trail forces users off the trail, resulting in bare soils. The proposed rehabilitation would provide a more adequate width for users to remain on the trail thereby encouraging growth of ground cover beside the trail.

#### ***Response to 18-01***

Since the Draft EA, crossing improvements were constructed at Shoreham Drive as part of the Beach Drive Road Reconstruction Project. The crossing was realigned to include a single crosswalk, and safety elements were incorporated into the new design. Further improvement of the crossing is no longer proposed under the Rock Creek Multi-Use Trail Rehabilitation.

#### ***Response to 18-02***

This request has been forwarded to the DDOT Bicycle Advisory Council and will be further addressed during the detailed design phase of the project.

#### ***Response to 18-03***

The project team conducted several field visits to evaluate drainage concerns throughout the project area. During the detailed design phase of the project, flood prone areas would be addressed. Although flood prone areas were not specifically noted in the EA, it is a purpose of the project to install more effective drainage and erosion control. Drainage designs throughout the project would be prepared in coordination with DDOE and in accordance with DDOT Design Manual requirements.



December 20, 2011

Dear Folks Who Make Things Happen!

I support the position of the Friends of Rose Park in regard to keeping the pedestrian path in its' same location and width, in order to preserve its' pedestrian nature, for the safety of walkers, runners, and children.

I also agree that it would be much preferable to have a permeable surface. I do think that brick would be more in keeping with Georgetown and the appearance of parks throughout D.C. than asphalt, and much better for trees and plants.


19-01

We fall into the category of elderly frequent users of the path and we do feel that a wider path would create a situation attractive to bikers, in conflict with safe walking for us, and safe use of the play areas for toddlers.

We trust that all entitites will uphold their previous commitment to maintain the current width and location of the path.

Thank you for your attention.

Sincerely,

  
Lois and Dirk Jecklin  
1232 - 27<sup>th</sup> St NW  
Washington DC 20007

Copies: Terry Bellamy, Austina Casey, Joseph Lawson, Tara Morrison, Peter May, Jesus Aguirre, The Hon. Jack Evans, David Abrams

***Response to 18-04 and 18-05***

Page 87 of the EA states, "The Rock Creek Park multi-use trail passes under the Porter Street, NW and Klinge Road, NW ramps. A trail tie-in is proposed at this location as part of the Klinge Valley trail project... the tie-in would connect the Rock Creek Park multi-use trail with a new trail along Klinge Valley and points west." According to the 2011 Klinge Valley Trail FONSI, a six- to eight-foot multi-use trail would be constructed along the south side of Klinge Road and continue along the Porter Street ramp before connecting with the Rock Creek Trail below Porter Street, NW. The connection would be designed to provide safe passageway from Porter Street to the Rock Creek trail.

***Response to 19-01***

As described in Section 2.5.2 of the EA (page 35), trail material selection would be considered during the detailed design phase of the project. For the Rose Park trail, spot improvement areas, and new trail sections the design team will consider the use of pervious materials for the trail surface: but will also need to consider other factors such as safety, trail uses, and long-term maintenance.

Serious Urgent Attention – see attached letter.

KEEP THE ROSE PARK PATH AS IS!

Madam/Sir:

Your proposition is dangerous to everyone in the community and to all people who routinely use this path!

20-01

Marguerite Juengst |

1316 27<sup>th</sup> Street, NW

Washington DC 20007

email: [mjuengst@cbmove.com](mailto:mjuengst@cbmove.com)

***Response to 20-01***

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA.

At Rose Park, the current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail would accommodate the multiple user types of the path in a safer manner. Trail widening and a smoother surface could further promote use of the trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added and raise safety awareness. In further consideration of pedestrian/bicyclist safety, a synopsis of *Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice* was added to Chapter 4 of the Final EA under Human Health and Safety.

12/20/11

Mr. Terry Bellamy  
Director, DC Department of Transportation  
55 M Street, S.E., Suite 500  
Washington, D.C. 20003  
[terry.bellamy@dc.gov](mailto:terry.bellamy@dc.gov)

Ms. Austina Casey, Project Manager  
DC Department of Transportation  
Attn: Rock Creek Trail EA  
55 M Street, S.E., Suite 500  
Washington, D.C. 20003  
[austina.casey@dc.gov](mailto:austina.casey@dc.gov)

Mr. Joseph Lawson, Division Administrator  
Federal Highway Administration  
1990 K Street, N.W., Suite 510  
Washington, D.C. 20006  
[christopher.lawson@fhwa.dot.gov](mailto:christopher.lawson@fhwa.dot.gov)

Ms. Tara Morrison, Superintendent  
Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008  
[tara\\_morrison@nps.gov](mailto:tara_morrison@nps.gov)

Mr. Peter May, Associate Regional Director  
National Park Service  
1100 Ohio Drive, S.W.  
Washington, D.C. 20242  
[peter\\_may@nps.gov](mailto:peter_may@nps.gov)

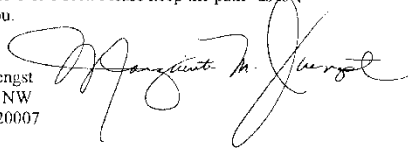
Mr. Jesus Aguirre, Director  
D.C. Dept. of Parks & Recreation  
3149 16<sup>th</sup> Street, N.W.  
Washington, D.C. 20010  
[jesus.aguirre@dc.gov](mailto:jesus.aguirre@dc.gov)

The Honorable Jack Evans  
D.C. City Council  
1350 Pennsylvania Ave., N.W., Suite 106  
Washington, D.C. 20005

Dear Agency Official:

I am writing to you to express my support for the position taken for more than a decade by Friends of Rose Park to keep the pedestrian path which runs through Rose Park at its current width and in its current location. NPS has previously promised our community that the path would be rehabilitated but remain in its current location and at its current width. Any widening of the path will result in danger to the hundreds of small children and toddlers who travel between all of the play areas in the park on a weekly basis, and to the elderly who walk along the path at any given time. In addition, if a larger area of bare ground is covered by a non-permeable, asphalt, surface, the less water is available for planting and natural ground cover. The initial draft of the Environmental Assessment put out by DDOT and FHA fails to address the major safety issues to pedestrians which exist if the path is widened to 6 or 8 feet. Please keep the path "as is", in its current location and at its current width. Thank you.

Sincerely yours,  
Marguerite M. Juengst  
1316 27<sup>th</sup> Street, NW  
Washington DC 20007



21-01

21-02

### **Response to 21-01**

Original correspondence with the NPS indicated the trail would not be widened. NPS also stated the use of the trail would not be restricted. Subsequently, NPS and DDOT determined that trail widening was necessary based on field observation and trail counts in order to accommodate all users. As a compromise, NPS and DDOT decided an approximate zero to two-foot widening of the trail would resolve concerns. The current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail will accommodate the multiple user types of the path in a safe manner. In a letter dated August 24, 2011, NPS selected Rose Park Option B (six-foot resurfaced trail).

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA. Trail widening and a smoother surface could further promote use of the Rose Park trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added and raise safety awareness. To address potential conflict between trail users and park users in the Rose Park area, additional analysis was added to the EA under Human Health and Safety in Chapter 4.

### **Response to 21-02**

Measures to protect vegetation throughout the entire project area including Rose Park are described on page 38 of the EA. For the Rose Park trail, the proposed zero to two-foot widening would not have

Thank you for your prompt response. This is an important issue for all citizens, neighborhood residents and visitors to DC who use this path.

We have to be involved. Year after year DOT continues to bring it up! The use has not changed – nor should it be by virtue of making it wider for a continuous caravan of bikes to use it as a short cut! **Pedestrians have rights too!** Yet DOT continues to harp on the path use against the urgencies of the community! It is a bad idea to broaden the path. A dangerous idea. An unfair precedent that all paths should be wide enough for bikes! Use common sense. Senior citizens, small children, adults, and families – (with baby carriages), native citizens and visitors to the city all use this path for pleasure and for a connection to close neighborhoods by walking. Bikes can use the paths that have already been designated for them on Rock Creek Parkway.

**Marguerite Juengst |**

1316 27<sup>th</sup> Street, NW

Washington DC 20007

email: [mjuengst@cbmove.com](mailto:mjuengst@cbmove.com)

22-01

appreciable effects on vegetation or ground water seepage. The existing narrow width of the Rose Park trail forces users off the trail, resulting in bare soils. The proposed rehabilitation would provide a more adequate width for users to remain on the trail thereby encouraging growth of ground cover beside the trail.

#### ***Response to 22-01***

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA.

At Rose Park, the current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail would accommodate the multiple user types of the path in a safer manner. Trail widening and a smoother surface could further promote use of the trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added and raise safety awareness. In further consideration of pedestrian/bicyclist safety, a synopsis of *Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice* was added to Chapter 4 of the Final EA under Human Health and Safety.

**From:** nancyflinn@aol.com [mailto:nancyflinn@aol.com]  
**Sent:** Tuesday, December 20, 2011 4:29 PM  
**To:** Bellamy, Terry (DDOT)  
**Subject:** Rose Park Path

Dear Mr. Bellamy:

Several years ago, I was a part of a neighborhood group studying the use of the Rose Park land and pedestrian walkway. For three days, from approximately 8am to 6pm, we counted the number of pedestrians, bicyclers, skate boarders, parents with strollers and little children. The greatest use of the Rose Park pathway was pedestrians (WALKING, presumably to work) in the early and late hours. Also during these early hours, dogs were being walked. During the course of the daytime hours, significant numbers of nannies, mom pushing strollers and many walking youngsters traversing the path between two playgrounds were counted. As well as a small number of runners. Bicyclers and skate boarders comprised the smallest group using the path. This was presumed to be because of the parallel bike, runner path directly below along Rock Creek Parkway.

Based on these findings then, which I believe hold true today, I am writing to express my support to keep the pedestrian path which runs through Rose Park at its current width and in its current location. For those who use this path, including me and many friends and neighbors, it works well. I understand that NPS promised our community that the path would be rehabilitated and/or maintained, but continue to remain in its current location and at its current width. Any widening of the path will result in danger to the hundreds of small children and toddlers who travel between all of the play areas in the park on a weekly basis, and to the elderly who walk along the path at any given time. In addition, if a larger area of bare ground is covered by a non-permeable, asphalt, surface, the less water is available for planting and natural ground cover.

23-01

23-02

The initial draft of the Environmental Assessment put out by DDOT and FHA fails to address the major safety issues to pedestrians which exist if the path is widened to 6 or 8 feet. And it appears to fail to address the actual usage of the path. It works well for those who use it and are a majority. Please keep the path "as is", in its current location, and at its current width. This makes sense and will save taxpayer money.

Thank you.

Sincerely yours,

Nancy Flinn  
2714 1/2 Poplar Street NW  
Washington DC, 20007

### ***Response to 23-01***

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA.

At Rose Park, the current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail would accommodate the multiple user types of the path in a safer manner. Trail widening and a smoother surface could further promote use of the trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added and raise safety awareness. In further consideration of pedestrian/bicyclist safety, a synopsis of *Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice* was added to Chapter 4 of the Final EA under Human Health and Safety.

### ***Response to 23-02***

Measures to protect vegetation throughout the entire project area including Rose Park are described on page 38 of the EA. For the Rose Park trail, the proposed zero to two-foot widening would not have appreciable effects on vegetation or ground water seepage. The existing narrow width of the Rose Park trail forces users off the trail, resulting in bare soils. The proposed rehabilitation would provide a more adequate width for users to remain on the trail thereby encouraging growth of ground cover beside the trail.

Dear Ms. Morrison

We are writing to you to express our support for the position taken for more than a decade by Friends of Rose Park to keep the pedestrian path which runs through Rose Park at its current width and in its current location. NPS has previously promised our community that the path would be rehabilitated but remain in its current location and at its current width. Any widening of the path will result in danger to the hundreds of small children and toddlers who travel between all of the play areas in the park on a weekly basis, and to the elderly who walk along the path at any given time. In addition, if a larger area of bare ground is covered by a non-permeable, asphalt, surface, the less water is available for planting and natural ground cover. The initial draft of the Environmental Assessment put out by DDOT and FHA fails to address the major safety issues to pedestrians which exist if the path is widened to 6 or 8 feet. Please keep the path "as is", in its current location and at its current width. Thank you.

Sincerely yours,

Randy & Russell Katz  
2723 Q ST NW  
[rkatz@momidc.com](mailto:rkatz@momidc.com)

24-01

24-02

#### ***Response to 24-01***

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA.

At Rose Park, the current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail would accommodate the multiple user types of the path in a safer manner. Trail widening and a smoother surface could further promote use of the trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added and raise safety awareness. In further consideration of pedestrian/bicyclist safety, a synopsis of *Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice* was added to Chapter 4 of the Final EA under Human Health and Safety.

#### ***Response to 24-02***

Measures to protect vegetation throughout the entire project area including Rose Park are described on page 38 of the EA. For the Rose Park trail, the proposed zero to two-foot widening would not have appreciable effects on vegetation or ground water seepage. The existing narrow width of the Rose Park trail forces users off the trail, resulting in bare soils. The proposed rehabilitation would provide a more adequate width for users to remain on the trail thereby encouraging growth of ground cover beside the trail.

PEPC Correspondence  
Keep Private: Yes  
Date Received: 12/23/11

ROSE PARK

I support the Rose Park Trail Option C- 8'wide trail. The 8' width is needed to accommodate the existing volume of trail users. I recommend that supplemental lighting be added to the lower portion of the trail similar to the trail lights on the northern part.

25-01

BEACH DRIVE TUNNEL

I support the modifications to the Beach Drive tunnel for 2- 11' lanes and a 5' trail. However instead of bollards I recommend a low profile guardrail similar to the guardrail on the P St. NW bridge. This type of rail is less intrusive and not as likely to cause drivers or bikers to move away from the edge of the road or path toward the center line and thus threaten oncoming traffic. This may be especially the case with the narrower 11' lanes.

25-02

***Response to 25-01***

New lighting was considered by the project team but dismissed based on standard NPS policy. As described on page 41 of the EA, "Rock Creek Park is closed from dusk to dawn. Furthermore, according to NPS Management Policies (NPS 2006), the NPS seeks to preserve, to the greatest extent possible, the natural lightscapes of parks."

***Response to 25-02***

The preferred alternative would widen the path to a four foot width. Due to the constraints of the tunnel, construction of a pathway greater than four feet wide would not be feasible. Current designs include a low-profile guardrail for trail use/vehicle separation.

Dear All: I have lived for 20 years on Dumbarton Street, one block away from Rose Park. I have been involved, along with many neighbors, in rehabilitating the park from a place that people avoided to a green place that people flock to for sports, a farmers market, a tot lot and to sit on a bench to read a book with a cup of coffee.

One of the most exciting times for me was when I began to see real estate ads that mentioned a house "was near Rose Park." In fact, many of us believe that the park is part of a reason that young families choose to move into or stay on the east side of Georgetown.

Any one who spends real time in the park knows it is a community park.

My reason for writing to you is to express my strong opposition to an **asphalt** path in the park. Today while driving out MacArthur Boulevard I noticed the path along the canal is packed dirt/sand. While living in Europe for three years the paths through the parks are all pervious surfaces. In Colorado, where I spend time, the National Parks pride themselves on paths that are environmentally friendly both to the land and to the wildlife.

26-01

Asphalt in this day and age is not a smart surface. It is not good for the environment and because after a short time it cracks and sinks in places it is dangerous for walkers and bike riders. A look at what is there now will let you know asphalt is not a good choice.

I support the path remaining where it is now located, keeping it at 6 feet in width and encouraging its use as a walking path whether for baby carriages, tots running and playing or for people willing to walk their bikes for several hundred yards. I STRONGLY OPPOSE A SURFACE OF UNSIGHTLY ASPHALT IN A NATIONAL PARK SETTING.

Sincerely,  
Pamla H. Moore

***Response to 26-01***

As described in Section 2.5.2 of the EA (page 35), trail material selection would be considered during the detailed design phase of the project. For the Rose Park trail, spot improvement areas, and new trail sections the design team will consider the use of pervious materials for the trail surface; but will also need to consider other factors such as safety, trail uses, and long-term maintenance.



Ms. Austina Casey  
Project Manager  
DC Department of Transportation  
Attn: Rock Creek Trail EA  
55 M Street, S.E., Suite 500  
Washington, D.C. 20003

Dear Ms. Casey,

I live at 2500 Q St, which backs onto P St, so we take Rose Park path to M St to commute to work and other purposes. I think expanding and repaving the path is an excellent idea. The path is too narrow to currently accommodate pedestrians, dogs and other path users.

27-01

Widening the path would make it safer (not more dangerous, as others might believe). As a cyclist, I have common sense and know not to speed through a neighborhood or sidewalk when others are using it. There is no way that the Rock Creek Park trail could be considered an alternative to the Rose Park path, as they are at different elevations, and go to different places with different access points.

27-02

For folks who are concerned about small children wandering onto the path (where is their supervision?), a small fence of some type could easily solve this potential dilemma.

27-03

Fixing the path to increase safety is very much needed. Cyclists are not the enemy to safety, and easily co-exist with other trail users, as we do in the streets and other paths

through the city and region. A wider, safer path is not an incentive for cyclists who live in the neighborhood to speed through our own neighborhood to get from/to town from our homes. But it is a way to keep us safer, too.

27-04

There are simple ways to co-exist with multiple trail users while improving the path itself. Thank you for seeing the larger picture. The 21st century awaits.

Sincerely,

FWG

***Response to 27-01, 27-02, 27-03 and 27-04***

Thank you for your interest and response. Your comments will be included as part of the public record for the project.

I live near Rose Park and frequently walk there, with my wife, with my dog, and alone. I think widening the path would be a major mistake. It is at present quite wide enough to permit walkers going in opposite directions to pass with ease. Widening it would encourage bicyclists to use the path at speed, and this usage should be discouraged. Many bicyclists are a law unto themselves, uncaring of pedestrians, tearing along at pell-mell speeds, endangering all near them.

Please do not widen the path. It is wide enough.

The path could be improved, however, as it frequently floods near the southwestern corner of the park, where the farmers' market meets in the summer.

--  
Henry Townsend  
2918 P Street NW  
Washington, DC 20007  
[202.333.9343](tel:202.333.9343)

28-01

***Response to 28-01 and 29-01***

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA.

At Rose Park, the current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail would accommodate the multiple user types of the path in a safer manner. Trail widening and a smoother surface could further promote use of the trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added and raise safety awareness. In further consideration of pedestrian/bicyclist safety, a synopsis of *Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice* was added to Chapter 4 of the Final EA under Human Health and Safety.

I live at 2500 Q Street across the street from Rose Park. I understand that a substantial widening of the pedestrian path through the park is being considered. Although the current path is not in good repair, doubling or tripling its width would expose pedestrians to even more risk from cyclists than exists now. It would also increase the risks from swerving cyclists to those nearby, including children who use the playground beside the path.

29-01

The National Park Service should recognize the safety issues and the concerns of neighborhood users and supporters of the park and keep its previous promises not to widen the path.

Sincerely,

Marilyn Field  
2500 Q Street NW

SUSAN AND WOLF SAPIRSTEIN  
1308 27th Street, N.W.  
WASHINGTON, D.C. 20007  
(202) 338-4909

December 28, 2011

Ms. Austina Casey, Project Manager  
DC Department of Transportation  
Att: Rock Creek Trail EA  
55 M Street S.E. Suite 500  
Washington,  
20003

D.C.

Dear Ms. Casey:

We are writing to express our support to keep the pedestrian path which runs through Rose Park at its current width and in its current location. We live in the 1300 block of 27th Street, and are directly across from the Park and the path. We use the path regularly and are intimately aware of who uses it and how it is used. We believe that the path as presently configured should not be changed.

We understand that NPS promised our community that the path would be rehabilitated and/or maintained but continue to remain in its current location and at its current width. Any widening of the path will result in danger to the small children and toddlers who travel between all of the play areas in the park on a weekly basis, and to the many pedestrians and joggers who use the path. By far the greatest use of the path is in the form of foot traffic: people with children, people walking dogs, and individuals walking to and from work or the metro who are using the path as a shortcut. In our experience, most bicyclists use the path on Rock Creek, or ride on the neighboring streets. Enlarging it to accommodate bicyclists would be a mistake, and create a dangerous environment for the people who are not on bikes. In addition, if a larger area of bare ground is covered by a non-permeable, asphalt, surface, the less water is available for planting and natural ground cover.

The initial draft of the Environmental Assessment put out by DDOT and FHA fails to address the major safety issues to pedestrians which exist if the path is widened to 6 or 8 feet. And it appears to fail to address the actual usage of the path. It works well for those who use it and are a majority. Please keep the path "as is", in its current location, and at its current width. This makes sense and will save taxpayer money.

Sincerely yours,

Wolf and Susan Sapirstein

### **Response to 30-01 and 30-03**

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA.

At Rose Park, the current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail would accommodate the multiple user types of the path in a safer manner. Trail widening and a smoother surface could further promote use of the trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added and raise safety awareness. In further consideration of pedestrian/bicyclist safety, a synopsis of *Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice* was added to Chapter 4 of the Final EA under Human Health and Safety.

### **Response to 30-02**

Measures to protect vegetation throughout the entire project area including Rose Park are described on page 38 of the EA. Along the Rose Park trail, the proposed zero to two-foot widening would not have appreciable effects on vegetation or ground water seepage. The existing narrow width of the Rose Park trail forces users off the trail, resulting in bare soils. The proposed rehabilitation would provide a more adequate width for users to remain on the trail thereby encouraging growth of ground cover beside the trail.

30-01

30-02

30-03

*Citizens Association of Georgetown*

1365 Wisconsin Avenue Suite 200

Washington DC 20007

202-337-7313

[cagmail@cagtown.org](mailto:cagmail@cagtown.org)

[www.cagtown.org](http://www.cagtown.org)

December 28, 2011

Austina Casey

D.C. Department of Transportation

2000 14<sup>th</sup> Street, N.W., 6<sup>th</sup> Floor

Washington, D.C. 20009

Dear Ms. Casey,

On behalf of the over 1200 members of the Citizens Association of Georgetown, I would like to reiterate our association's long-held position on the potential impact from rehabilitating, widening, rerouting or otherwise modifying the Rose Park Path. We believe:

- 1) The path should remain in its current location and at its current width.
- 2) The path should be renovated as its current condition is hazardous.
- 3) No bike traffic should be allowed on the path because of the dangers of mixing uses on such a narrow path and because of the intense use of the path by children and pedestrians.

31-01

We stand firmly in sync with the Friends of Rose Park and Advisory Neighborhood Commission 2E in our position.

Please contact me should you have any questions regarding this matter.

Sincerely,

Jennifer M. Altemus  
President  
Citizens Association of Georgetown

***Response to 31-01***

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA.

At Rose Park, the current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail would accommodate the multiple user types of the path in a safer manner. Trail widening and a smoother surface could further promote use of the trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added to raise safety awareness. In further consideration of pedestrian/bicyclist safety, a synopsis of *Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice* was added to Chapter 4 of the Final EA under Human Health and Safety.



 **RECEIVED**  
1-9-2012

January 6, 2012

Mr. Peter May  
Regional Director  
National Park Service  
1100 Ohio Drive, S.W.  
Washington, D.C. 20242

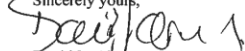
Board Members  
David Dunning, President  
Dr. Russell Bridges, Treasurer  
Katie Sexton, Secretary  
David Abrams  
Toni Brody  
John Donovan  
Anna Fuhrman  
Marjorie Heiss  
Rob Hetem  
Pamla Moore  
Victoria Rigby  
Dave Salwen  
Leslie Wheelock  
Jill White

RE: Friends of Rose Park, Inc.  
Written Comments  
To the Rock Creek Multi-Use Trail  
Rehabilitation Environmental  
Assessment

Dear Mr. May:

Enclosed please find a copy of the Written Comments submitted by Friends of Rose Park, Inc. to the Environmental Assessment completed regarding the Rock Creek Multi-Use Trail Rehabilitation Project.

We look forward to the National Park Service keeping the oral and written promises made to our group, and to the Georgetown community, over the past decade to keep the path at its current width and at its current location.

Sincerely yours,  
  
David L. Abrams  
For Friends of Rose Park

Friends of Rose Park, Inc.  
[www.roseparkdc.org](http://www.roseparkdc.org)  
c/o David L. Abrams, 1410 26<sup>th</sup> Street, N.W., No. 1, Washington, D.C. 20007  
(202) 351-9921 (C)  
[jake.chase@juno.com](mailto:jake.chase@juno.com)



**WRITTEN COMMENTS  
SUBMITTED BY FRIENDS OF ROSE PARK, INC.  
TO THE ROCK CREEK MULTI-USE TRAIL REHABILITATION  
ENVIRONMENTAL ASSESSMENT  
ISSUED NOVEMBER, 2011**

Dated: January 6, 2012

Board Members  
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Dr. Russell Bridges, Treasurer  
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John Donovan  
Anna Fuhrman  
Marjorie Heiss  
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Pamla Moore  
Victoria Rigby  
Dave Salwen  
Leslie Wheelock  
Jill White

Distribution List:

Mr. Peter May  
Regional Director  
National Park Service  
1100 Ohio Drive, S.W.  
Washington, D.C. 20242

Superintendent Tara Morrison  
Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008

Director Jesus Aguirre  
D.C. Dept. of Parks & Recreation  
3149 16<sup>th</sup> Street, N.W.  
Washington, D.C. 20010

Director Terry Bellamy  
D.C. Dept. of Transportation  
55 M Street, S.E., Suite 500  
Washington, D.C. 20003

Mr. Joseph Lawson  
Division Administrator  
Federal Highway Administration  
1900 K Street, N.W., Suite 510  
Washington, D.C. 20006

The Hon. Eleanor Holmes Norton  
U.S. House of Representatives  
2136 Rayburn House Office Bldg.  
Washington, D.C. 20515

The Hon. Jack Evans  
1350 Pennsylvania Avenue, N.W.  
Suite 106  
Washington, D.C. 20005

The Hon. Tom Birch  
1240 29<sup>th</sup> Street, N.W.  
Washington, D.C. 20007

Ms. Austina Casey  
Project Manager  
D.C. Dept. of Transportation  
Attn: Rock Creek Trail EA  
55 M Street, S.E., Suite 500  
Washington, D.C. 20003

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This document shall constitute written comments to the Rock Creek Park Multi-Use Trail Rehabilitation Environmental Assessment dated November, 2011, prepared pursuant to 42 U.S.C. § 4332(2)(c) by the U.S. Department of Transportation, the Federal Highway Administration, The National Park Service and the District of Columbia Department of Transportation in regard to the Rose Park section of the project and is being submitted by Friends of Rose Park, Inc., a non-profit, tax-exempt organization dedicated to maintaining and improving Rose Park, a small, narrow urban park located in Georgetown, Washington, D.C. These written comments are solely directed to the sections of the Environmental Assessment (hereafter referred to as "EA") which only relate to the portion of this rehabilitation project which runs directly through Rose Park.

**1. INTRODUCTION**

Friends of Rose Park, Inc. is a 501(c)(3) non-profit, tax exempt organization dedicated to maintaining and improving Rose Park, a small, narrow end-destination community park located in an east end residential neighborhood of Georgetown, Washington, D.C. The land which encompasses Rose Park is owned by both the District of Columbia government and also the Federal government. Federal lands are part of the National Park Services' Rock Creek Park.

Friends of Rose Park was organized 13 years ago to improve conditions in Rose Park, which had been neglected and overlooked by both the Federal government and the District of Columbia government for decades. Hundreds of thousands of dollars have been raised from neighbors and local community organizations to maintain, improve and

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○ install both softscape and hardscape amenities in the park. Friends of Rose Park built both the Dumbarton Street Tot Lot and the 26<sup>th</sup> and O Streets Playground which bring hundreds of children, infants to 3 years old and older, to the two play areas which are immediately adjacent to, and connected by, the path. We have planted more than 40 trees, thousands of daffodils and crocuses, and hundreds of rose bushes, holly bushes and other plantings. We have installed benches, a flagpole, park signage, and other items. We work with certified landscapers to maintain the park year-round and host numerous free annual events to bring the community together to celebrate the park. All of this has occurred at *no* cost to the District of Columbia government or the Federal government and has occurred with the approval of the D.C. Department of Parks & Recreation, the Old Georgetown Board and our local ANC2E.

Friends of Rose Park, Inc. has been recognized by our local ANC 2E as the “official community representative for Rose Park.” See, letter dated April 12, 2011 from ANC 2E Chair Ron Lewis, attached as Exhibit No. 1. Accordingly, Friends of Rose Park, Inc. is to be considered by the agencies involved in the Rock Creek Park Multi-Use Trail Rehabilitation project, and by EA’s project team, as *the* primary stakeholder for issues of concern to Rose Park.

## 2. THE ENVIRONMENTAL ASSESSMENT AS IT PERTAINS TO ROSE PARK

○ There is a 1,800 foot section of a pedestrian path which runs through Rose Park which is being considered for rehabilitation under the overall scope of the larger Rock Creek Multi-Use Trail rehabilitation project. The EA mistakenly describes the lineal footage as 2,600 feet - this is an incorrect number and despite a written request to DC-DDOT for clarification as to what encompasses the 2,600 feet, and which agency or consulting firm came up with this 2,600 foot figure, no *definitive* answer has yet been provided. Friends of Rose Park and other community groups have been trying for over 13 years to have the National Park Service address and resolve the deteriorated condition of the pedestrian path which runs through the park. Numerous attempts to resolve the conditions of this path have had false starts, beginning back in the 1990’s, and this most current effort has been going on for at least 3 years.

32-01

32-02

The position of Friends of Rose Park as to fixing the condition of the path has been consistent over the years: for safety reasons, the path *must* remain in its current site, at the top of the hill overlooking the Rock Creek Parkway, and at its current width, which runs from 4-5 feet in different sections of the path. We have had verbal and written promises from various Federal and city agencies over the years that the path would be kept in its current location and at its current width, including statements from National Park Service Director Robert Stanton and Rock Creek Park Superintendent Adrienne Coleman. See, letter from Ms. Coleman, attached as Exhibit No. 2, where she states with specificity that “...the path will not be widened...”. Emphasis added.

○ Indeed, the numbers of path users as counted by the EA’s authors themselves, discussed more fully in §8, below, evidences that more pedestrians, including walkers, runners and people

### ***Response to 32-01***

The linear footage that is listed as 2,600 feet referred to the Rose Park trail and connecting ramps, which were grouped together for the purpose of describing the Rose Park trail option. To be more exact, the Rose Park trail is 1,929 feet long, the north connection ramp to P Street is 363 feet long, and the south connection ramp to M Street is 388 feet long. The combination of these three segments is 2,680 linear feet. The EA has been revised to include these footages in reference to the Rose Park trail.

### ***Response to 32-02***

Under the preferred alternative, the Rose Park trail would be resurfaced to improve its condition.



pushing baby strollers, far outnumber people who ride bikes on the path. This clear fact dictates that widening the path would adversely affect the majority of users who actually use the path.

3. THE NATIONAL ENVIRONMENTAL PROTECTION ACT OF 1969, AS AMENDED, AND THE INSTANT ENVIRONMENTAL ASSESSMENT

The purpose of the National Environmental Policy Act of 1969, as amended, is “[T]o declare a national policy which will encourage productive *and enjoyable harmony between man and his environment*; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and nature resources important to the Nation; and to establish a Council on Environmental Quality.” 42 U.S.C. § 4321 §§ 2

The instant EA, undertaken by the involved Federal and city agencies, is guided, among other statutes, regulations and documents, by NPS Management Policies (NPS 2006), which states that the EA shall consider the effects of any proposed action taking into account Visitor Safety (§8.2.5.2) and Public Health (§8.2.5.5). The EA as it is presently written totally fails to discuss, mention or take into account Visitor Safety or Public Health in that the EA fails to discuss at all the safety and health of the children playing in the various play areas in the park despite the fact that the essential purpose of NEPA is to ensure that *all* environmental factors *are weighted equally* when compared to other factors in the decision making process undertaken by Federal agencies. Indeed, the EA’s recommendation to widen the path will not enhance “harmony between man and his environment: in our park; rather, widening the path will result in more chaos and confrontations between walkers and bicycle riders.

32-03

The purpose of an EA is to determine whether the impacts of a proposed action or reasonable alternatives to that action may be significant. In the instant case, the proposed options to widen the path to 6 or 8 feet are unreasonable given the fact that leaving the path at its current width has been historically preferred by a vast majority of neighbors and users of the park, as amply demonstrated by the public comments presented to the involved agencies over the past 12 years. See, e.g., letter from Peter Pulsifer, ANC2E Chair, dated December 10, 2000, attached as Exhibit No. 3; letter from Ed Solomon, ANC2E Chair, dated December 7, 2006, attached as Exhibit No. 4; letter from Denise Cunningham, President of the Citizen’s Association of Georgetown, dated January 8, 2008, attached as Exhibit No. 5; letter from Ed Solomon, ANC2E Chair, dated January 10, 2008, attached as Exhibit No. 6; letter from Ron Lewis, ANC2E Chair, dated February 7, 2011, attached as Exhibit No. 7; letter from D. Cary Mitchell, Esq., dated February 7, 2011, attached as Exhibit No. 8; letter from Jennifer Altemus, President of the Citizen’s Association of Georgetown, dated December 28, 2011, attached as Exhibit No. 10; and letter from Edith Schafer, dated January 5, 2012, attached as Exhibit No. 11.

**Response to 32-03**

To address concerns regarding trail user safety in the Rose Park area, further consideration of pedestrian/bicyclist user conflicts was added to the EA under Human Health and Safety in Chapter 4. According to the FHWA document *Conflicts on Multi-use Trails: Synthesis of the Literature and State of the Practice*, user conflicts on multiple-use trails are a common concern. Research suggests that minimization of user contact in congested areas is an effective measure to reduce conflicts. Accordingly, the preferred alternative at Rose Park is intended to minimize contact between users by providing a wider, smoother trail that would accommodate different uses. Additional suggestions to reduce conflicts on multi-use trails include educational elements in the form of signage or brochures posted at trailheads to identify safety issues and promote trail sharing. During final design of the trail rehabilitation, DDOT and NPS would consider these elements to improve the safety of the trail.

4. **THE EA's PROJECT TEAM MIS-STATES THAT THE PATH IS TOO NARROW FOR SPECIOUS AND MIS-STATED REASONS; ACCORDINGLY THEIR UNILATERAL, BASELESS CONCLUSION TO WIDEN THE PATH FAILS**

In § 2.8.3 of the EA, at page 38, the authors state that

"...the project team considered rehabilitation options for the Rose Park trail which included paving the trail in its current width. Because the existing trail is too narrow, this option was dismissed. Trail users routinely leave the paved trail surface in order to walk side by side or pass other users. This migration of users from the trail has caused trampling of vegetation. In several locations, the tramped area beside the trail is one or two feet wider than the paved trail surface. While feasible, it would not be practical to rehabilitate the trail at its existing width because users would continue to migrate from the trail, and replanting would not be successful."

The project team is correct in stating that a dirt track of approximately one foot wide runs on the side on the paved path. However, the project team is incorrect in stating the reasons for the creation of this dirt track. It is incorrectly asserted that the dirt track was created because trail users routinely leave the paved trail to pass other users. In fact, the dirt track was created by runners who wish to follow the direction of the pedestrian path but who choose to run on dirt, a softer service than asphalt. The project team, not knowing how the path and our park are used, mistakenly jumps to a conclusion which is factually incorrect.

32-04

32-05

Based on the factually incorrect assumption and the false and negligently asserted reasons put forth by the project team, the team unilaterally dismisses paving the path at its current width *although they state with specificity that such an option is absolutely feasible*. EA § 2.8.3 at page 38.

After relying solely on one incorrect fact, the project team then considers three other options for the path: (1) taking no action at all, (2) widening the path to 6 feet and (3) widening the path to 8 feet.

The first option, of taking no action at all, will not be discussed herein because all concerned parties agree that the path needs to be rehabilitated.

As to widening the path, the park has six (6) separate and distinct play areas for children of various ages which immediately abut the pedestrian path: the north lawn, the softball field, the 26<sup>th</sup> and O Street Flagpole Playground, the asphalt play area at the basketball court, the Dumbarton Street playground, and the south lawn. The total linear footage of the pedestrian path, from M Street, NW to where P Street, NW connects with the access roadway down to the Rock Creek Parkway, is 1,806 feet. 565' of the total length, or roughly one-third, runs from the 26<sup>th</sup> and O Streets Flagpole Playground to the Dumbarton Street Playground. During any given

**Response to 32-04 and 32-05**

This statement was made based on visual observations during site visits where various users were observed leaving the paved surface to pass other users. Runners are included among the users who contributed to the deterioration of the areas adjacent to the paved trail.

week, hundreds of small children and toddlers use the path to walk and toddle between the various play areas, riding their tricycles, pedaling along in their pint-sized cars, or pushing their scooters. Parents walk their tethered small children and push their baby strollers between these play areas, and if the path were to be widened, especially with no calming effect<sup>1</sup>, bicyclists would zip by the small ones on the newly created, smooth super-highway, creating more of a public safety hazard than currently exists.

32-06

The health and safety of the children and other users of the path necessitates that the original promises made by NPS to keep the path at its current width *must* be kept, for the following reasons:

1. The path is *not* too narrow at its current width. The project team specifically states that it is “feasible” to pave the path at its current width. EA § 2.8.3 at page 38. The current width has served the neighborhood well over the past years and will continue to serve the neighborhood well at its current width.

2. The authors are mistaken when they write that some trampled parts of the grass next to the trail are 1-2 feet wide. This is not factually correct – at no part of the path is the “trampled” part next to the path 2 feet wide. This is an exaggeration on the part of the authors in a misguided attempt to not pave the path at its current width and, as such, is contrary to public policy. Importantly, Courts have invalidated NEPA documents that rely on flawed data. See, *Natural Resources Defense Council vs. U.S. Forest Service* (No. 04-35868, 35 ELR 20160, 9<sup>th</sup> Cir., Aug. 5, 2005), *Native Ecosystems Council vs. U.S. Forest Service* (No. 04-35375, 35 ELR 20166, 9<sup>th</sup> Cir. Aug. 11, 2005), *Ecology Center vs. Norton* (No. 03-35095, 35 ELR 20248, 9<sup>th</sup> Cir.

32-07

Dec. 8, 2005). The assertion that the dirt track which runs beside the path is 2 feet wide, in addition to the assertion that the path is 2,600 long and not 1,800 long, are both exaggerations and thus must be considered as flawed data.

32-08

3. As is obvious to anyone who has walked the path, there is a dirt track which runs beside for the path for the 1,800 foot section of the path which runs through the park, but this dirt track will always be present no matter how wide the path is asphalted – it is caused not by people who are trying to walk two abreast on the path, as there is

<sup>1</sup> During meetings with members of representatives of the various Federal and City agencies involved in writing this EA, including a meeting at the site of the pedestrian path, promises were made by the project team that the EA would affirmatively discuss the placement of “calming effects” on any re-surfaced area of the path, i.e., “calming effects” such as speed bumps or grooves in the surface of the path to slow down speeding bicycles. The concession on the part of the project team that calming effects on the path were necessary is a clear recognition on their part that bicycles speeding through the park are a danger to pedestrians. Despite this acknowledgment, no mention at all is made in the EA by the project team as to the need for “calming effects” thus the agencies have failed to meet their responsibilities to the community and have failed to meet NEPA and CEQ standards and regulations.

32-09

5

### **Response to 32-06**

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA.

At Rose Park, the current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail would accommodate the multiple user types of the path in a safer manner. Trail widening and a smoother surface could further promote use of the trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added and raise safety awareness. In further consideration of pedestrian/bicyclist safety, a synopsis of *Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice* was added to Chapter 4 of the Final EA under Human Health and Safety.

### **Response to 32-07 and 32-08**

The measurement provided in the EA is an estimate and does not affect the intensity of impacts to any of the resources within Rose Park.

### **Response to 32-09**

DDOT and NPS did not make any commitments to incorporate or eliminate the use of calming measures in the EA. During the design process, DDOT will evaluate where site specific safety measures can be incorporated along the 5.1 miles of trail rehabilitation including the trail options, roadway crossings and new connections.

plenty of room on the path for people to walk side-by-side – rather, it is caused by runners who prefer to run on a dirt surface because it is easier on their feet, ankles and knees. It is a commonly accepted sports medicine fact that running on dirt is preferable to running on a hard surface such as asphalt. See, Pat Connelly in *Runner's World*, www.secondwindrunning.com. The fact that the project team bases their entire renunciation of leaving the path at its current width on this incorrect and baseless premise is simply wrong. Accordingly, this rationale violates NEPA standards because the argument is specious, capricious and self-serving. Self-serving statements which are arbitrary, capricious and unreasonable serve only to make the EA fail because NEPA standards do not allow such self-serving, incorrect statements to form public policy. See, *National Wildlife Federation vs. Schafer*, 38 ELR 20186 (W.D. Wash. 2008).

The abject failure of the project team to more fully consider, discuss and weigh the option of keeping the path at its current width, instead of unilaterally dismissing it for specious and factually wrong reasons, again goes against public policy and the standards established by NEPA. NEPA specifically requires Federal agencies to study, develop and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources. See, NEPA, §102(2)(E).

**5. THE PROJECT TEAM HAS FAILED TO TAKE A “HARD LOOK” AT THE IMPACT ON THE ENVIRONMENTAL HEALTH AND SAFETY WHICH THE PROPOSED PROJECT WOULD HAVE ON THE ENJOYMENT OF RECREATIONAL ACTIVITIES IN THE PARK AND HAS FAILED TO TAKE A “HARD LOOK” AT ALTERNATIVE BUILDING MATERIALS FOR THE RESURFACING PROJECT**

The Federal agencies involved in this process are required by NEPA to demonstrate that potential environmental impacts are given a “hard look”. See, *Geertson Seed Farms vs. Johanns*, No. 06-01075, 37 ELR 20047 (N.D. Cal. Feb. 13, 2007); *Ohio Valley Environmental Coalition vs. United States Army Corp of Engineers*, No. 3:05-0784, 37 ELR 20070 (S.D.W.V. Mar 23, 2007); *Western Watersheds Project vs. Kraavenbrink*, 620 F.3d 1187 (9<sup>th</sup> Cir. 2010). *Native Ecosystems Council vs. Tidwell*, 599 F3d 926 (9<sup>th</sup> Cir. 2010). The fact that the project team does not address or consider the health and safety issues as presented herein results in this EA being faulty and not in compliance with NEPA or CEQ regulations.

32-10

Further, as the project team is well aware, if any agency decides to *not* prepare an EIS it is required to supply a convincing statement of reasons to explain why a project’s impacts are insignificant. The statement of reasons is crucial in determining whether the agency took a hard look at the potential environmental impact of a project. See, *Center for Biological Diversity vs. National Highway Traffic Safety Administration*, 2007 U.S. App. LEXIS 26555 (9<sup>th</sup> Cir. Nov. 15, 2007). The EA as presently written abjectly fails to provide any statement of reasons which

32-11

**Response to 32-10**

The Rock Creek Multi-Use Trail Rehabilitation EA is in full compliance with the requirements of NEPA; the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); FHWA Technical Advisory T6640; the NPS NEPA compliance guideline (DO-12), and the National Historic Preservation Act of 1966, as amended. The work is also compliant with NPS Management Policies.

The project team analyzed impacts of the project objectively and determined that the proposed trail rehabilitation would result in human health and safety benefits, based on the repair of the trail surface, vehicle separations, and crossing improvements. The analysis did involve a “hard look” which was carried out through on-site investigation, review of available resources, coordination with local and regional agencies, and analysis of public comments.

**Response to 32-11**

To address concerns regarding trail user safety in the Rose Park area, further consideration of pedestrian/bicyclist user conflicts was added to the EA under Human Health and Safety in Chapter 4.

address how the health and safety of children and other users of the park will be negatively affected if the path is widened to 6 or 8 feet. Accordingly, this EA again fails to meet the standards established by Courts in their correct oversight of agencies' implementation of NEPA standards.

32-11

In addition, although no mention is made of a specific building surface material for the re-paving project, the project team is clearly favoring an impervious surface material, such as asphalt, for the resurfacing of the path. No discussion or consideration is given, however, of using an alternative resurfacing material, such as brick, which is permeable and which would allow water to penetrate to the trees, plantings and ground cover which surround the affected area, despite the project team being asked to consider such an alternative material. The project team has failed to take a "hard look" at alternative resurfacing materials which again leads this EA to fail under existing NEPA standards and CEQ regulations. Increasing the impervious surface in the park is at odds with the fact that this is a park where impervious surfaces should be minimized as much as possible, or reduced – not increased.

32-12

32-13

32-14

**6. THE PROJECT TEAM FAILS TO PROVIDE ANY INFORMATION IN THE EA AS TO WHAT WILL HAPPEN TO A VERY OLD OAK TREE SITED AT THE DUMBARTON STREET TOT LOT LOCATED IMMEDIATELY ADJACENT TO THE PEDESTRIAN PATH, THUS AGAIN FAILING TO TAKE A "HARD LOOK" AT ALL OF THE ENVIRONMENTAL FACTORS REQUIRED PURSUANT TO NEPA**

There is a venerable old oak tree located at the Rose Park Dumbarton Street Tot Lot, on land owned by the District of Columbia government, not the Federal government. The circumference of the tree is more than 12 feet and it is at least several hundred years old. Friends of Rose Park have consistently been told over the years by certified arborists, including privately retained arborists and arborists from Casey Trees, the D.C. Department of Parks & Recreation, and the D.C. Urban Forestry Administration, that the tree is in excellent health.

The pedestrian path runs *immediately* next to this tree and *it is impossible to increase the width of the path where it runs next to the tree to 6 or 8 feet without causing a major impact to the root system of the tree.* The EA specifically provides that if the path were to be increased to either 6 or 8 feet that "No large, mature trees in the Rose Park area would be removed..." EA, §§ 4.5.2.4 and 4.5.2.5, pp 109-110. Despite this "promise", *no discussion or consideration is given to the fact that on the east side of the old oak tree there is no room for the path to be widened to 6 feet or 8 feet.* On the east side of the oak tree there is the current path which is presently 5 feet and 2 inches in width. See, photo of this section of the path, where the tree abuts the path, attached as Exhibit No. 9. On the immediate east side of the path there is an *immediate* sheer drop off to the hillside which runs several hundred feet down to the Rock Creek Parkway. Erosion has caused this drop off to occur over the past 13 years. Friends of Rose Park has been actively advocating for rehabilitation of the path for the past 13 years but the National Park Service has closed its eyes to the problems located at this specific site on the path by taking no

32-15

32-16

***Response to 32-12 and 32-14***

As described in Section 2.5.2 of the EA (page 35), trail material selection would be considered during the detailed design phase of the project. For the Rose Park trail, spot improvement areas, and new trail sections the design team will consider the use of pervious materials for the trail surface; but will also need to consider other factors such as safety, trail uses, and long-term maintenance.

***Response to 32-13***

As described in the response to comment 32-10, The Rock Creek Multi-Use Trail Rehabilitation EA is in full compliance with the requirements of NEPA and other pertinent regulations. Analysis of resurfacing materials is outside of the scope of the EA. As described in Section 2.5.2 of the EA (page 35), trail material selection for Rose Park would be considered during the detailed design phase of the project.

***Response to 32-15 and 32-16***

As stated on page 38 and within Chapter 4 of the Final EA, protection measures and BMPs would be implemented to avoid impacts to all types of park vegetation to the extent possible. Vegetation protection measures for the oak tree near the Dumbarton Street playground area may include development of a tree save plan by an arborist or licensed tree expert, or installation of tree protection fencing. Impacts to the tree's root system would be avoided to the extent possible. If necessary, alternative trail materials and/or narrowing of the trail would be utilized to preserve the tree's roots.



action 13 years ago when the problem was first identified by Friends of Rose Park and when the problem would have been easier to resolve.

The project team is acutely aware of the location of this one oak tree, and the unique problems it brings to the design of the path rehabilitation project, as several project team members have personally visited the site on at least one, if not several, occasions with the undersigned. Promises were made over the past three years to Friends of Rose Park by project team members that the EA would address the concerns presented by this tree and its location right next to the path, yet *no* mention of the tree and its very unique status is made in the EA. The EA thus again fails to meet the standards established by NEPA and CEQ regulations and case law.

32-17

**7. THE EA IS REplete WITH INCORRECT DATA, FALSE DATA, FLAWED DATA AND SLOPPY MISTAKES AND THUS FAILS THE STANDARDS SET FORTH BY NEPA AND THE CEQ**

It is well established that Courts have invalidated NEPA documents that rely on flawed data. See, *Natural Resources Defense Council vs. U.S. Forest Service* (No. 04-35868, 35 ELR 20160, 9<sup>th</sup> Cir., Aug. 5, 2005), *Native Ecosystems Council vs. U.S. Forest Service* (No. 04-35375, 35 ELR 20166, 9<sup>th</sup> Cir. Aug. 11, 2005), *Ecology Center vs. Norton* (No. 03-35995, 35 ELR 20248, 9<sup>th</sup> Cir., Dec. 8, 2005). The EA sections which pertain to the Rose Park portion of the project are filled with mistakes authored by the project team. Examples of these mistakes include, but are not necessarily limited to, the following:

1. The project team states that the Rose Park segment of the overall project is 2,600 feet. § S.1, Introduction, p. 1. The project team is wrong. The Rose Park path is 1,806 feet from where the path begins on the northern side of the park at P Street, N.W., where P Street intersects with the access roadway going down to the Rock Creek Parkway, to where it ends on the southern side of the park at the M Street sidewalk. DDOT was contacted for clarification as to the genesis of the 2,600 foot number, but DDOT could not, with any specificity, provide the name of the person, agency or subcontracting firm which came up with the figure of 2,600 feet, could not, with any specificity, provide a specific designation as to where the 2,600 foot path began and ended and could not, with any clear specificity state what specific lineal footage was included in the alleged 2,600 foot figure.

32-18

2. The project team relies on flawed data when it proposes to widen the path to 6 feet and 8 feet. § 4.5.2.4 of the EA, at page 109, states that a 6 foot resurfaced trail will result in "...an increase of **0.20 acres** of impervious surface...". Emphasis added. However, on that very same page, page 109, §4.5.2.5 states that if the path were to be increased to 8 feet wide, it would (also) result in "... **0.20 acres** of impervious surface...". Emphasis added. The project team members use the same 0.20 acres of impervious surface being added to the park if the path is increased to **either 6 or 8 feet**. This number clearly has to be wrong in one instance or the other because

32-19

**Response to 32-17**

As described in the response to comment 32-10, The Rock Creek Multi-Use Trail Rehabilitation EA is in full compliance with the requirements of NEPA and other pertinent regulations. Measures to protect the oak tree near the Dumbarton Street playground area are described in Section 2.5.2 to include the use of alternative trail materials and/or narrowing of the trail.

**Response to 32-18**

The linear footage that is listed as 2,600 feet referred to the Rose Park trail and connecting ramps, which were grouped together for the purpose of describing the Rose Park trail option. To be more exact, the Rose Park trail is 1,929 feet long, the north connection ramp to P Street is 363 feet long, and the south connection ramp to M Street is 388 feet long. The combination of these three segments is 2,680 linear feet. The EA has been revised to include these footages in reference to the Rose Park trail.

**Response to 32-19**

The calculated area of 0.20 acres referenced was an error. Table 9 on page 104 of the EA provides the correct acreage of impervious area that would be added under each alternative and option. Additional impervious surface proposed under the preferred Rose Park trail option would be 0.07 acres. Additional impervious area associated with the Rose Park trail options was revised throughout the EA using calculations from Table 9.

shear logic dictates that an 8 foot wide path which the project team alleges is 2,600 feet long would result in an impervious surface which contains more surfaced area than a path which is widened to only 6 feet. This mistake represents not just flawed data but a sloppy mistake on the part of the authors.

3. As part of the rationale for widening the path to 6 or 8 feet the authors of the EA state, in an inartful attempt to strengthen their position that the path should be widened, that "...some areas (of the path) are overgrown with vegetation." §1.4, Project Area, at p. 6. In direct opposition to this false assertion, **no areas of the path are now, or have ever been, overgrown with any sort of vegetation.** The National Park Service and the D.C. Department of Parks & Recreation regularly mow the grass which grows on either side of the pedestrian path during grass growing season, and volunteers working with Friends of Rose Park regularly clip and trim vegetation which grows from the fence line which abuts a portion of the path. The statement by the project team that portions of the path are overgrown with vegetation is therefore patently false and another example of the sloppy observations by members of the project team. It is clear evidence that the project team does not know our park.

32-20

4. A discussion was held above about how the project team mistakenly says that the dirt track which runs next to the path is 2 feet wide. § 2.8.3 at p. 38. As previously stated, this figure is incorrect and needs to be also be "counted" as flawed data.

32-21

5. In discussing possible effects of the project on local Rose Park archeology, the EA's authors state that "Avoidance, minimization, and mitigation **within as yet unidentified archeological resources**, would result in no adverse effects." EA, § 2.10, Table 2, p 46. Emphasis added. How can the authors know if there is any impact, or any adverse effects on any archeological resources when these resources have not yet been identified. Again, flawed data.

32-22

All of these examples, although seemingly innocuous, perhaps, by themselves, add up to grossly flawed data upon which the project authors are relying in their self-serving determination that the path should be increased to either 6 or 8 feet. **Again, it is well settled law that Courts have voided NEPA documents which rely on flawed, self-serving data.**

#### **8. WHEN CONSIDERING THE CULTURAL LANDSCAPE OF ROSE PARK, HISTORY DICTATES KEEPING THE WIDTH OF THE ROSE PARK PATH AT ITS CURRENT WIDTH AND NOT WIDENING IT AT ALL**

The project team mistakenly asserts that the two options of widening the path to either 6 or 8 feet "...would not have an effect on the cultural landscape because it is not a component of Rock Creek Park's cultural landscape." EA, p. 45.

The project team spends absolutely no time discussing the history of Rose Park and the fact that the path as it currently exists has historically been used as a pedestrian "short-cut"

#### ***Response to 32-20***

The sentence was removed from the EA.

#### ***Response to 32-21***

The measurement provided in the EA is an estimate and does not affect the intensity of impacts to any of the resources within Rose Park.

#### ***Response to 32-22***

According to page 138 of the EA, "As the presence of NRHP-eligible archeological sites is at present unknown, and as final design plans are not available, only general strategies for the mitigation of adverse impacts can be outlined. It is the preferred mitigation strategy to avoid any disturbance to archeological sites by siting of the project component, including trail and connector construction and grading. The lead agencies would continue to coordinate with DC HPO in accordance with project commitments on further archeological investigations or mitigation measures if necessary." This is the agreed upon strategy to refine the scope of the study until a more detailed design is available.

between the port of Georgetown and the residential neighborhoods and commercial areas of the West End and Dupont Circle areas of Northwest Washington.

The park is not a “commuter” park but, rather, is a “destination” park, in that neighbors of the park for generations and generations have used it as a recreation source. See, *Black Georgetown Remembered*, Georgetown University Press, 1991, which documents that Rose Park was the first integrated, end-destination community park in the city of Washington, D.C.

The short sighted individuals who wish to increase the width of the path are mainly bicycle users who wish to create a super-highway through the park which can be utilized for bicycle trail “connectivity” reasons, i.e., as a lazy-persons shortcut between M Street and P Street. Contrary to misstatements which have been made by others, Friends of Rose Park has never advocated the absolute ban of bicycles from Rose Park. We have, however, consistently maintained the fact that if the width of the path is increased to a smooth surfaced 6 feet or 8 feet, it will increase the flow of bicycles speeding through the park which will have an absolute negative impact on the health and safety of children and others using the park and using the path.

32-23

The numbers and types, or categories, of path users which the project team itself has identified as using the path clearly evidences that the path is used mainly by pedestrians and not bicycle riders. On Thursday, May 5, 2011, project team members allegedly conducted a 2-hour survey of who used the Rose Park path between the hours of 4:45 pm and 6:45 pm. The results show that 259 walkers, runners, and people using baby strollers or walking dogs used the path as opposed to a mere 30 people using bicycles. See, Table 7, Trail User Counts on May 5, 2011, a graphic chart compiled by the project team, EA at page 84. Despite the sheer numbers weighing in favor of the position taken for more than a decade by Friends of Rose Park that the path is a *pedestrian* path, the project team wishes to increase the width of the path to accommodate an overwhelming minority of the paths’ users, i.e., bicyclists, while subjecting the majority of path users, i.e. walkers, to significantly increased dangers posed by bicyclers speeding down a new, smooth highway-like surface.

Despite the best intentions of some bicycle riders and some bicycle organizations, the vast majority of Rose Park path bike riders totally disregard the children and pedestrians who use the path to travel from one play area to another play area. The law in the District of Columbia clearly states that it is the responsibility of bicyclers who ride on sidewalks to move out of the way of pedestrians. This rarely, if ever, happens on the pedestrian path. The law in the District of Columbia as it pertains to bicycles riding on sidewalks prohibits bicycles from riding on sidewalks in the Central Business District. See, D.C.M.R. Title 18, Chapter 12, § 1201.9. As anyone who has ever walked on a downtown D.C. sidewalk knows, bicyclers are forever riding on the sidewalks, disrupting pedestrians and disregarding the law. Further, D.C.M.R. Title 18, Chapter 12, § 1201.10 specifically states that “Any person riding a bicycle upon a sidewalk *shall yield the right-of-way to pedestrians*, and shall travel at a speed no greater than the posted speed limits of the adjacent roadway; Provided, that such speed is safe for the conditions then existing on the sidewalk.” Emphasis added. **There is a culture, however, among a majority of bicycle riders where they exert their physical presence against pedestrians in a manner which is**

### **Response to 32-23**

As described in response to comment 32-06, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added to raise safety awareness.



aloof and dismissive. Any number of parents and park users can testify that almost *no* bicyclist adheres to the rules about yielding to pedestrians when traveling on the Rose Park path. They speed by as if they had the right of way, not the pedestrians, ringing their bicycle bells, glaring at pedestrians for being in the way, and yelling at pedestrians to get out of the way.

**9. WHILE THE PROJECT TEAM HAS INVITED PUBLIC COMMENT ON THE ENVIRONMENTAL ASSESSMENT PURSUANT TO NEPA, THE TEAM HAS FAILED TO INCORPORATE THE PUBLIC COMMENTS IT RECEIVED IN ANY DISCERNIBLE MEASURE**

Friends of Rose Park has been consistent in its position over the years that the pedestrian path which runs through the park should be kept at its current width and in its current location, and the agencies involved in this project, which have previously supported this position, are more than amply aware of this position due to written and verbal, public, comments made by Friends of Rose Park over the years.

Other individuals, organizations and our own local ANC2E have also historically advised the involved agencies that the path should be kept at its current width and in its current location. See, Exhibits 3 through 7, attached. In addition, over the past decade, DC-DDOT, NPS, FHA and DPR have received hundreds of letters imploring the agencies to keep the path in its current width. See, letter from D. Cary Mitchell, Esq., a neighbor and park user, dated February 7, 2011, attached as Exhibit 8, as an example of the letters which have been sent in by members of the community. See also, letter from Edith Schafer, dated January 5, 2012, attached as Exhibit No. 11. See, especially, letter from Jennifer Altemus, President of the Citizens Association of Georgetown, dated December 28, 2011, attached as Exhibit No. 10. *Ms. Altemus, writing on behalf of the over 1,200 members of CAG, reiterates her organizations' long held position that the path must not be widened.*

The EA, however, fails to address the position put forth by Friends of Rose Park and also fails to take into account that hundreds and hundreds of Georgetown residents, organizations, and elected and appointed officials have contacted the various agencies involved in this project over the years, expressing their individual and organizational support of the position taken by Friends of Rose Park to keep the path at its current width.

It is well established that Federal agencies must involve the public in the preparation of an Environmental Assessment and take into account the public's comments on any given project. *California Trout vs. Federal Energy Regulatory Commission*, 572 F.3d 1003 (9<sup>th</sup> Cir. 2009) and *Theodore Roosevelt Conservation Partnership vs. Salazar*, 605 F.Supp.2d 263 (D.D.C. 2009). The EA as it is currently written fails to meet this standard.

***Response to 32-24***

The current width of the Rose Park Trail varies from four to five feet, which is below DDOT's and AASHTO's minimum width for a multi-use trail (8 feet). Taking into account the Friends of Rose Park concerns, the preferred alternative would resurface the Rose Park trail to a six-foot width, which is the standard width of a DDOT residential sidewalk.

32-24

10. THE PROJECT TEAM FAILS TO PROVIDE ANY INFORMATION IN THE EA AS TO THE AREAS OF THE PEDESTRIAN PATH WHICH FLOOD EVEN AFTER THE LIGHTEST OF RAINFALLS, THUS AGAIN FAILING TO TAKE A "HARD LOOK" AT ALL OF THE ENVIRONMENTAL FACTORS REQUIRED PURSUANT TO NEPA

Friends of Rose Park has made the project team aware on numerous occasions that the pedestrian path floods during even the slightest rain in three distinct places: (1) for a 20-30 foot length on the path where the path immediately abuts the 26<sup>th</sup> and O Streets Flagpole Playground; (2) for a 20-40 foot length on the path where the path immediately abuts the Rose Park basketball court at the center fence cut-through and the southern cut-through between the fence and the Rose Park Recreation Center stone retaining wall; and (3) where the path meanders through the copse of trees at its southern end near the M Street sidewalk.

32-25

Severe flooding occurs on a 20-40 foot section of the path which abuts the Rose Park basketball court at both the center cut-through of the fence and at the southern cut-through between the end of the fence line and the stone retaining wall surrounding the Rose Park Recreation Center. There are two drains in these two areas, but several years ago, when the sub-contractor for the D.C. Department of Parks and Recreation repaired and re-painted the surface of the basketball court, the sub-contractor negligently paved over the two drains, thus blocking water from draining away. The DPR Capital Projects Office was made aware of this negligent action on the part of the subcontractor *the day it happened* but no remedial action was ever taken by the Capitol Projects Office or the subcontractor. The result is that when it rains even the slightest amount, pooling of water occurs on the path in this section of the path. When a significant rainfall occurs a pool of standing water results which can be as deep as 2 inches or more. The location of these two drains were pointed out by the undersigned to project team members during a walk-through of the site in February, 2011, yet no mention of the pooling is made in the EA and no corrective action has yet been taken.

32-26

11. CONCLUSION

The EA totally ignores the danger which would face the hundreds of infants, toddlers, small children and other users of the park if the path were to be widened to 6 or 8 feet. The EA further fails to provide any discussion or explanation as to how the Dumbarton Street Tot Lot oak tree would be saved if the path were to be widened. Importantly, the project team admits freely, clearly and unequivocally in the EA that it is feasible to re-pave the path at its current width. However, the project team then goes on to rely on false, mis-written and incorrect data to present two other options for widening the path to 6 feet and 8 feet. The project team specifically relies on the single assertion that by widening the asphalt path from its current width to 6 feet or 8 feet that the dirt track which runs beside the current path will somehow magically

**Response to 32-25 and 32-26**

Based on comments received from the Friends of Rose Park and others, the project team conducted several field visits to evaluate drainage concerns at Rose Park and other locations in the project area. During the detailed design phase of the project, flood prone areas would be addressed. Although flood prone areas were not specifically noted in the EA, it is a purpose of the project to install more effective drainage and erosion control. Drainage designs throughout the project would be prepared in coordination with DDOE and in accordance with DDOT Design Manual requirements.

disappear. As stated above, the dirt track will always be present because runners will create this dirt track simply because runners prefer to run on grass or dirt as opposed to asphalt.

The Federal and District of Columbia agencies involved in this project must, therefore, revise the EA to reflect the overwhelming desire of the neighbors, community organizations and a vast majority of park users to keep the path at its current width and in its current location.

Sincerely yours,

Friends of Rose Park, Inc.  
by David L. Abrams  
Member, Board of Directors  
1410 26<sup>th</sup> Street, N.W., No. 1  
Washington, D.C. 20007  
(202) 333-6366 (H)  
e-mail: jake.chase@juno.com

Enclosures:

- Exhibit No. 1, ANC2E letter designating Friends of Rose Park as the "official" community representative for Rose Park, dated April, 12, 2011
- Exhibit No. 2, letter from NPS Superintendent Adrienne Coleman, dated February 13, 2008
- Exhibit No. 3, support letter from ANC2E, dated December 10, 2000
- Exhibit No. 4, support letter from ANC2E, dated December 7, 2006
- Exhibit No. 5, support letter from CAG, dated January 8, 2008
- Exhibit No. 6, support letter from ANC2E, dated January 10, 2008
- Exhibit No. 7, support letter from ANC2E, dated February 7, 2011
- Exhibit No. 8, support letter from D. Cary Mitchell, Esq, dated February 7, 2011
- Exhibit No. 9, photo of the oak tree where it meets the path at the Dumbarton Street Tot Lot
- Exhibit No. 10, support letter from Jennifer Altemus, CAG, dated December 28, 2011
- Exhibit No. 11, support letter from Edith Schafer, dated January 5, 2012

Copy to:

Ms. Ruth Werner, Office of CM Jack Evans  
Mr. Jim Sebastian, DC DDOT  
Ms. Cindy Cox, NPS

GOVERNMENT OF THE DISTRICT OF COLUMBIA

## Advisory Neighborhood Commission 2E



Representing the communities of Burleith, Georgetown and Hillandale  
3265 S Street, NW • Washington, DC 20007  
(202) 724-7098 • [anc2e@dc.gov](mailto:anc2e@dc.gov)

**Exhibit No. 1**

By email

April 12, 2011

Sri Sekar  
c/o Department of Park and Recreation  
3149 16th Street, NW  
Washington, DC 20010

Dear Sri Sekar,

Advisory Neighborhood Commission 2E, during its regular monthly public meeting held on April 4, 2011, duly noticed and at which seven commissioners were present constituting a quorum, unanimously adopted the following resolution:

ANC 2E is proud to designate the Friends of Rose Park as the official community representative for Rose Park.

ANC2E Commissioners Lewis, Starrels, Solomon, Birch, Eason, Jones and Sticka, or any one or more of them, are authorized to act for ANC2E in this matter or any matters which may come before the Department relating thereto.

Sincerely,

Ron Lewis  
Chair, ANC 2E

COMMISSIONERS:

Ed Solomon, District 1 Ron Lewis, District 2 Jeff Jones, District 3 Jake Sticka, District 4  
Bill Starrels, District 5 Tom Birch, District 6 Charles F. Eason, Jr., District 7



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE  
National Capital Region  
Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008-1207



FEB 13 2008

Exhibit No. 2

Mr. David Salwen, President  
Friends of Rose Park, Inc.  
2816 Dumbarton Street, N.W.  
Washington, D.C. 20007

Dear Mr. Salwen:

We appreciate your contacting us to express your concerns about the path in Rose Park.

Our position on the management of the Rose Park path has not changed. We intend to continue to manage it in the manner that is has been for the past 10 years. We agreed several years ago that the path should remain in its current location and at its current width. We also agree that the path should be renovated. Through an agreement between the National Park Service and the D.C. Department of Transportation (DDOT), both agencies have contributed funding to rehabilitate not only the Rose Park path, but other segments of Rock Creek Park's trail system.

While there are guidelines (ASHTO) that recommend a width of 10 feet for multi-use trails, it is not a requirement. In fact, because of space limitations, many portions of Rock Creek Park's trails do not exceed 8 feet or less.

The Rose Park path has always been a multi-use facility, and it not the intention of the National Park Service to begin to exclude bikers, not to mention the unenforceability of such a policy. Since the path will not be widened, it is important for all users to understand that they must share the pathway, as they do with all other areas of Rock Creek Park's trail system.

We, too, look forward to a refurbished path that all users can enjoy. If you have questions, please contact me at 202-895-6004.

Sincerely,



Adrienne A. Coleman  
Superintendent, Rock Creek Park

Cc: The Honorable Jack Evans  
D.C. City Council  
1350 Pennsylvania Avenue, N.W., Rm. 106  
Washington, D.C. 20004

The Honorable Tom Birch  
ANC Commissioner  
1240 29<sup>th</sup> Street, N.W.  
Washington, D.C. 20007

Ms. Denise R. Cunningham  
Citizens Association of Georgetown  
1365 Wisconsin Avenue, N.W., Suite 200  
Washington, D.C. 20007

Mr. Jim Sebastian  
D.C. Department of Transportation

Mr. Clark Ray, Acting Director  
D.C. Department of Parks and Recreation  
3149 16<sup>th</sup> Street, N.W.  
Washington, D.C. 20010

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
**Advisory Neighborhood Commission 2E**

Representing the communities of Burleith, Foxhall-MacArthur,  
Georgetown and Hillandale  
3265 S Street, NW • Washington, DC 20007  
(202) 338-7427 • FAX (202) 338-0279 • anc2e@erols.com

**Exhibit No. 3**

December 10, 2000

Pamla H. Prochnow  
Friends of Rose Park  
2525 P Street, NW  
Washington, DC 20007

Dear Pam:

Thank you very much for attending our ANC 2E public meeting on December 5, 2000. It was good to hear from you that the National Park Service had decided to withdraw the proposal to widen the path at Rose Park. In the spirit of the evening the ANC with a quorum present passed the following resolution:

**ANC 2E puts itself on record as being opposed to widening  
the existing path at Rose Park.**

Please keep us informed of the future restoration plans at Rose Park and let us know if we can help in any way.

Happy Holidays.

Sincerely,

Peter Pulsifer  
Chair, ANC 2E

COMMISSIONERS:

Scott Polk, District 1 Fran Goldstein, District 2 Peter Pulsifer, District 3 Barbara Zartman, District 4  
Matt Payne, District 5 Bill Starrels, District 6 Mark Ryan, District 8

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
**Advisory Neighborhood Commission 2E**  
Representing the communities of Burleith, Georgetown and Hillandale  
3265 S Street, NW • Washington, DC 20007  
(202) 338-7427 • FAX (202) 338-0279 • anc2e@erols.com

December 7, 2006

**Exhibit No. 4**

Kimberly Flowers, Director  
Department of Parks and Recreation  
3149 16<sup>th</sup> Street, NW  
Room 207  
Washington, DC 20010

**RE: Foot Paths in Rose Park, Georgetown**

Dear Superintendent Coleman:

At the December 5, 2006 public meeting of ANC 2E, which was duly noticed and attended by all seven commissioners, Commissioner Haley made the following motion passed by a unanimous vote:

Whereas, ANC 2E commends the community for its dedication to improving facilities at Rose Park for the enjoyment and use of all. We are looking forward to review plans prepared for a much needed renovation of the Rose Park footpath.

Be it Resolved that:  
ANC 2E supports the Friends of Rose Park's efforts and desire for maintenance of the footpaths in their existing location and at their existing width;  
ANC 2E supports the rehabilitation of the Rose Park footpaths; and  
ANC 2E strongly objects to the widening of the footpaths or any change in their location.

We hope you will give our position thoughtful consideration. Thank you.

Sincerely,

Ed Solomon  
Chair, ANC 2E

COMMISSIONERS:

Ed Solomon, District 1   John Lever, District 2   Bill Skelsey, District 3   Brett Clements, District 4  
Bill Starrels, District 5   Gunnar Halley, District 6   Charles Eason, District 7



Exhibit No. 5

January 8, 2008

Susan Gygi,  
Senior Transportation Planning Engineer  
HNTB Corporation  
2900 South Quincy Street, Suite 200,  
Arlington, Va. 22206

Re Georgetown Transportation Study

Dear Ms. Gygi:

As you may know the Citizens Association of Georgetown is made up of over 1100 Georgetown residents who support the CAG mission "to preserve the historic character, to develop the aesthetic values of Georgetown . . . to help protect the interests of the residents and homeowners, and to assist in making it a pleasant place in which to live." Our active Board of (fourteen) Directors spearheads community education and advocacy regarding historic preservation and zoning, Alcoholic Beverage Control issues, and many other issues concerning streetscape, parks, traffic, parking, and utilities.

We have reviewed with interest the "Draft Report of Existing Conditions" dated November 21, 2007. Please note that a correction is needed with respect to the path through Rose Park. On page 9 and in Figure 7 this is referred to as an "existing bike trail". This is inaccurate. It is a path approximately 4' in width, and should be referred to as a 'footpath'.

Please also note that CAG supports the Resolution passed by unanimous vote by the ANC2E on December 7, 2006 that the footpath through Rose Park should be rehabilitated but not widened. A copy of the Resolution is attached for your reference.

Sincerely,

Denise Cunningham  
President

32-27

*Response to 32-27*

The current width of the Rose Park Trail varies from four to five feet, which is below DDOT's and AASHTO's minimum width for a multi-use trail (8 feet). Taking into account the Friends of Rose Park concerns, the preferred alternative would resurface the Rose Park trail to a six-foot width, which is the standard width of a DDOT residential sidewalk.

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
**Advisory Neighborhood Commission 2E**

Representing the communities of Burleith, Georgetown and Hillandale  
3265 S Street, NW • Washington, DC 20007  
(202) 338-7427 • FAX (202) 338-0279 • anc2e@erols.com

January 10, 2008

**Exhibit No. 6**

Mr. Clark Ray  
Acting Director  
D.C. Department of Parks and Recreation  
3149 16<sup>th</sup> Street, N.W.  
Washington, D.C. 20010

Mr. Emeka Moneme  
Director  
D.C. Department of Transportation  
2000 14<sup>th</sup> Street, N.W., 6<sup>th</sup> Floor  
Washington, D.C. 20009

Ms. Adrienne A. Coleman  
Superintendent, Rock Creek Park  
National Park Service  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008-1207

**RE: Rose Park Pedestrian Pathways**

Dear Mr. Ray, Mr. Moneme, and Ms. Coleman:

At the January 2, 2008 regularly scheduled public meeting of ANC 2E, at which a quorum was present, the following resolution passed by a unanimous vote:

Whereas ANC 2E commends the community for its dedication to improving facilities at Rose Park, including a much needed renovation of the Rose Park footpaths:

Be it resolved that ANC 2E supports the Friends of Rose Park's efforts and desire for maintenance of the footpaths in their existing location and at their existing width; ANC 2E supports the rehabilitation of the Rose Park footpaths; and ANC 2E strongly objects to the widening of the footpaths or any change in their location.

We trust that you will give this resolution its full weight. Thank you for your attention to this matter.

Ed Solomon

Chair, ANC 2E

GOVERNMENT OF THE DISTRICT OF COLUMBIA

**Advisory Neighborhood Commission 2E**

Representing the communities of Burleith, Georgetown and Hillandale  
3265 S Street, NW • Washington, DC 20007  
(202) 338-7427 • FAX (202) 338-0279 • anc2e@erols.com

February 7, 2011

**Exhibit No. 7**

Mr. Jesus Aguirre  
Director, D.C. Department of Parks and Recreation  
3149 16<sup>th</sup> Street, NW  
Washington, DC 20010

Mr. Terry Bellamy  
Interim Director, D.C. Department of Transportation  
2000 14th Street, N.W., 6th Floor  
Washington, D.C. 20009

Mr. Stephen Syphax  
Acting Superintendent, Rock Creek Park  
National Park Service  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008-1207

**Re: Rose Park Foot Path**

Dear Director Aguirre, Director Bellamy and Superintendent Syphax:

Advisory Neighborhood Commission 2E, at a public meeting held on January 31, 2011, duly noticed and at which six commissioners were present constituting a quorum, adopted the following resolution:

ANC 2E supports the Friends of Rose Park's efforts and desire for maintenance of the pedestrian foot path in its existing location and at its existing width; ANC 2E supports the rehabilitation of the Rose Park pedestrian foot path but ANC 2E strongly objects to the widening of the pedestrian foot path or any change in its location.

ANC 2E Commissioners Birch, Solomon, Lewis, Sticka, Starrels, and Jones, or any one or more of them, are authorized to act for ANC 2E in this matter and any matters which may come before the D.C. government or the National Park Service relating thereto.

Sincerely,

Ron Lewis  
Chair, ANC 2E

cc by email: Austina Casey, Project Manager, D.C. Department of Transportation

Exhibit No. 8

LAW OFFICES  
BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST, LLP

2120 L STREET, NW  
WASHINGTON, DC 20037  
(202) 659-0830  
FACSIMILE: (202) 828-5568

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES  
BUENOS AIRES, ARGENTINA

ROBERT M. JACKSON  
OF COUNSEL

PERRY W. WOOPER  
LEGISLATIVE CONSULTANT

EUGENE MALISZEWSKYJ  
DIRECTOR OF ENGINEERING  
PRIVATE RADIO

HAROLD MORDKOFKY  
BENJAMIN H. DICKENS, JR.  
JOHN A. PRENDERGAST  
GERARD J. DUFFY  
RICHARD D. RUBINO  
MARY J. SISA  
D. CARY MITCHELL  
SALVATORE TAILLEFER, JR.

ARTHUR BLOOSTON  
1914 - 1999

February 7, 2011

WRITER'S CONTACT INFORMATION  
202-828-5538  
cary@bloostonlaw.com

Via First Class Mail and Electronic Filing

Mr. Terry Bellamy  
Interim Director  
DC Department of Transportation  
2000 14th Street, N.W., 6th Floor  
Washington, D.C. 20009

Mr. Jesus Aguirre  
Director  
DC Department of Parks & Recreation  
3149 16th Street, N.W.  
Washington, D.C. 20010

Mr. Stephen Syphax  
Acting Superintendent  
Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008-1207

Ms. Austina Casey  
Project Manager  
DC Department of Transportation  
2000 14th Street, N.W., 7th Floor  
Washington, D.C. 20009

Re: Rose Park Pedestrian Path - Georgetown

Dear Mr. Bellamy, Mr. Syphax, Mr. Aguirre, and Ms. Casey:

I have been a Georgetown resident since 1996 and I am writing to you in support of the position taken by Friends of Rose Park, the ANC 2E and the Citizens Association of Georgetown in regard to the Pedestrian Path which runs through Rose Park in Georgetown.

In the second Environmental Assessment which you are conducting in regard to the Rock Creek Park Multi-Purpose Trail you must consider that the 3,000 foot segment of the Rose Park Pedestrian Path is a separate pedestrian path which runs through Rose Park and must not be considered as a multi-use trail.

32-28

I am an avid bicycle rider and applaud the District for its work in developing bicycle lanes and participation in the Capital Bikeshare program. However, widening the path and/or encouraging bicycle traffic through Rose Park is a recipe for disaster. The path is used intensively by children and senior citizens who live in my neighborhood, as well as joggers, families with pets, and commuters walking to and from the Dupont Circle metro station. I would never consider riding my bike on that short stretch of footpath because of the dangers this would pose to my neighbors and their children/pets. Others who are less familiar with Rose Park are not likely to be as respectful when they're "looking for a shortcut between Georgetown and Dupont Circle" which is all the proposed widening of the pathway would do

32-29

Response to 32-28

Rose Park trail options are addressed separately from the Rock Creek Park multi-use trail in the EA. In consideration of comments received regarding Rose Park, the preferred alternative would resurface the Rose Park Trail to a maximum six-foot width, whereas the Rock Creek Park multi-use trail would be resurfaced at six to ten foot widths.

Response to 32-29

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA.

At Rose Park, the current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail would accommodate the multiple user types of the path in a safer manner. Trail widening and a smoother surface could further promote use of the trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added and raise safety awareness. In further consideration of pedestrian/bicyclist safety, a synopsis of *Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice* was added to Chapter 4 of the Final EA under Human Health and Safety.

February 7, 2011

Comments of D. Cary Mitchell and Samantha A. Tysz  
Page 2

I have personally witnessed numerous "close calls" and a handful of accidents/conflicts between bicycles and pedestrians in the narrow stretch of path between the toddler play area and steep hillside. Due to the location of the fenced play area and large trees, there is no room for widening the pathway and this will become a chokepoint. I don't like to "rat out" my fellow cyclists, but the individuals who choose to ride on the Pedestrian Path now seldom dismount out of respect for others. Making the path wider in other parts of Rose Park will only make matters worse. Bicycles are simply not compatible with all the strollers and tricycles in the area.

32-30

Signs and maps – and construction resources – should instead encourage cyclists to use the existing Multi-Use Trail along Rock Creek Parkway. This would channel visitors and local cyclists to access the excellent Georgetown Waterfront Park (which is nearing completion) as well as the C & O Canal National Historic Park and to take advantage of these resources. It would also promote use of the newly-built Capital Bikeshare station at 30<sup>th</sup> and K Streets and it would discourage bicyclists from zooming up the sidewalk or riding against one-way traffic to cut back across the bridge at M and 26<sup>th</sup> Street. It would be dangerous to channel increased bicycle traffic directly onto M Street (where there is fast-moving traffic and a 6" granite curb) or the already busy pedestrian sidewalk where the proposed Rose Park Multi-Use Trail would come to a full stop.

32-32

I believe there are plenty of existing roadways and that provide safe riding in and around Georgetown for responsible bicyclists like me. Widening the path will not only encourage more bicycle use through an area that is not well suited for two-wheeled traffic, but (and take from one who knows) it will actually encourage these riders to go faster. In addition to the increased risk of accidents, turning the Pedestrian Path into a bicycle thoroughfare is also likely lead to additional litter (and increased maintenance costs for DDOT and NPS), and the added water runoff is likely to cause increased erosion on the hillside. Areas adjacent to the path are almost certain to become a rutted, muddy mess and grass in the park will be crisscrossed with makeshift pathways from cyclists taking shortcuts. In sum, turning the Pedestrian Path into a multi-use trail is likely to upset the current peaceful character of Rose Park for the whole community.

32-33

32-34

32-35

In closing, my wife and I respectfully submit that the Rose Park Pedestrian Path must be repaired in its current location and it must be maintained at its current width. We urge you not to move or widen the path for any purpose.

Respectfully submitted,

Cary Mitchell

D. Cary Mitchell  
Samantha A. Tysz, MD  
1228 28<sup>th</sup> Street, NW  
Washington, DC 20007  
Tel. (202) 338-2734

**Response to 32-30, 32-31 and 32-33**

To address concerns regarding trail user safety in the Rose Park area, further consideration of pedestrian/bicyclist user conflicts was added to the EA under Human Health and Safety in Chapter 4. According to the FHWA document *Conflicts on Multi-use Trails: Synthesis of the Literature and State of the Practice*, user conflicts on multiple-use trails are a common concern. Research suggests that minimization of user contact in congested areas is an effective measure to reduce conflicts. Accordingly, the preferred alternative at Rose Park is intended to minimize contact between users by providing a wider, smoother trail that would accommodate different uses. Additional suggestions to reduce conflicts on multi-use trails include educational elements in the form of signage or brochures posted at trailheads to identify safety issues and promote trail sharing. During final design of the trail rehabilitation, DDOT and NPS would consider these elements to improve the safety of the trail.

**Response to 32-32**

The suggested trail resources and construction are outside the scope of the proposed trail rehabilitation. For the Rose Park trail, signage would be considered during design of the trail rehabilitation to promote safety. NPS and DDOT determined that widening of the Rose Park trail was necessary based on field observation and trail counts in order to accommodate all users. Minimum requirements for multi-use trail facilities involve a trail width of eight feet, for short distances under physical constraints. In consideration of comments received from the Friends of Rose Park, NPS and DDOT propose a six-foot width to resolve concerns.

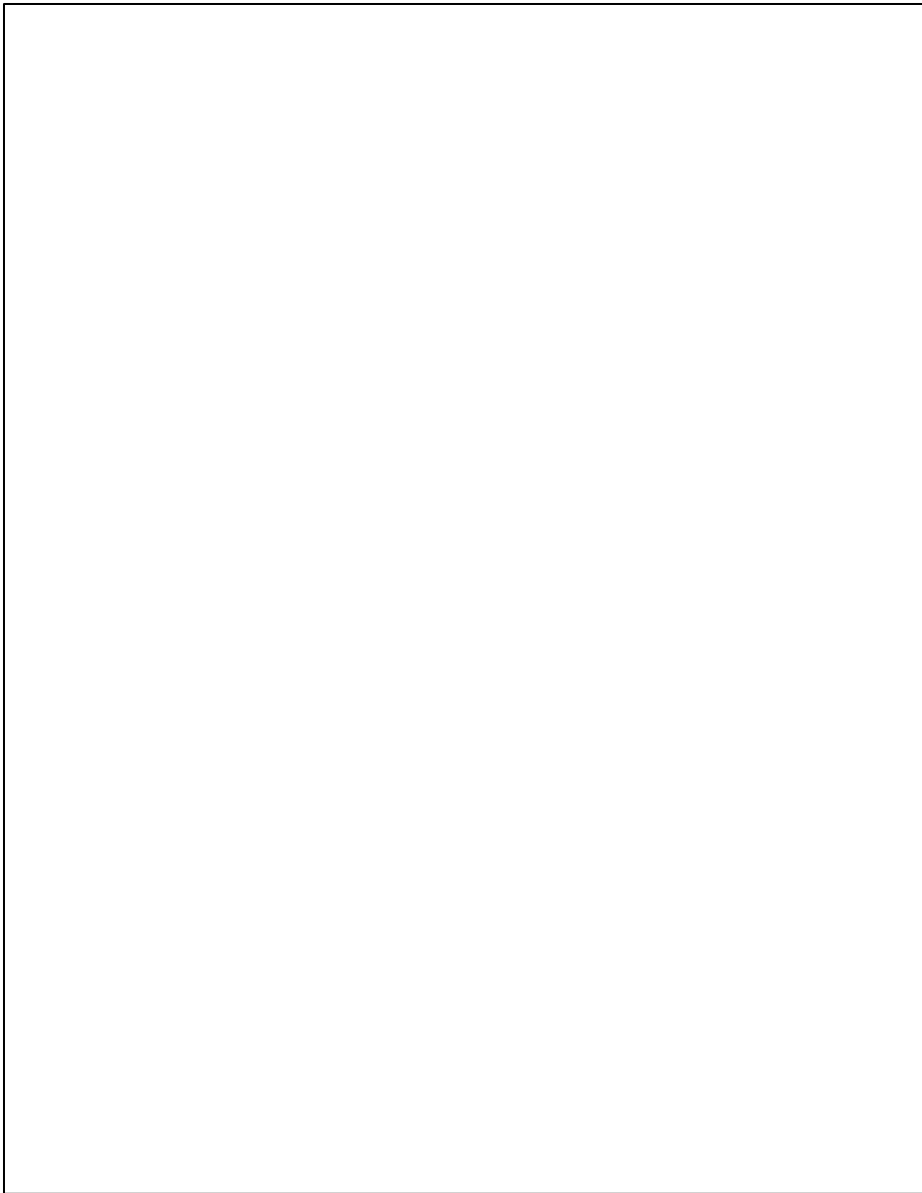
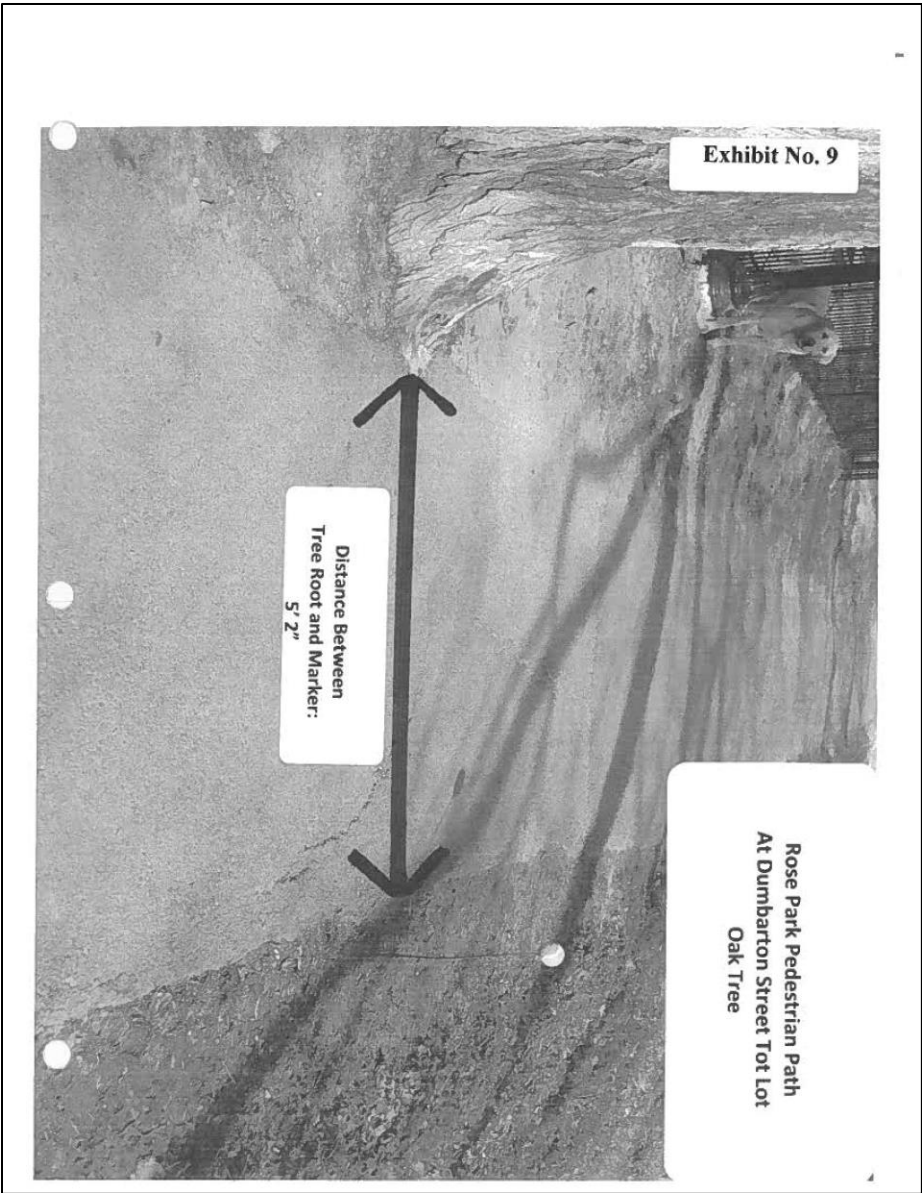
**Response to 32-34**

Under the preferred Rose Park trail option, the trail would be resurfaced to a width of six feet - the standard width of a DDOT residential sidewalk. The

effects of the proposed zero- to two-foot widening are not expected to result in additional litter.

***Response to 32-35***

Based on comments received from the Friends of Rose Park and others, the project team conducted several field visits to evaluate drainage concerns at Rose Park and other locations in the project area. During the detailed design phase of the project, flood prone areas would be addressed. Although flood prone areas were not specifically noted in the EA, it is a purpose of the project to install more effective drainage and erosion control. Drainage designs throughout the project would be prepared in coordination with DDOE and in accordance with DDOT Design Manual requirements.



## Citizens Association of Georgetown

1365 Wisconsin Avenue Suite 200  
Washington DC 20007  
202-337-7313  
cagmail@cagtown.org  
www.cagtown.org

Exhibit No. 10

December 28, 2011  
Austina Casey  
D.C. Department of Transportation  
2000 14<sup>th</sup> Street, N.W., 6<sup>th</sup> Floor  
Washington, D.C. 20009

Dear Ms. Casey,

On behalf of the over 1200 members of the Citizens Association of Georgetown, I would like to reiterate our association's long-held position on the potential impact from rehabilitating, widening, rerouting or otherwise modifying the Rose Park Path. We believe:

- 1) The path should remain in its current location and at its current width.
- 2) The path should be renovated as its current condition is hazardous.
- 3) No bike traffic should be allowed on the path because of the dangers of mixing uses on such a narrow path and because of the intense use of the path by children and pedestrians.

32-36

We stand firmly in sync with the Friends of Rose Park and Advisory Neighborhood Commission 2E in our position.

Please contact me should you have any questions regarding this matter.

Sincerely,

Jennifer M. Altemus  
President  
Citizens Association of Georgetown

Cc: Mr. Jesus Aguirre, Director  
D.C. Department of Parks and Recreation  
3149 16<sup>th</sup> Street, N.W.  
Washington, D.C. 20010

Mr. Emeka Moneme, Director  
D.C. Department of Transportation  
2000 14<sup>th</sup> Street, N.W., 6<sup>th</sup> Floor  
Washington, D.C. 20009

Mr. Stephen Syphax, Acting Superintendent  
Rock Creek Park  
National Park Service  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008  
Citizens Association of Georgetown  
1365 Wisconsin Avenue Suite 200  
Washington DC 20007  
cagmail@cagtown.org  
www.cagtown.org

### *Response to 32-36*

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA.

At Rose Park, the current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail would accommodate the multiple user types of the path in a safer manner. Trail widening and a smoother surface could further promote use of the trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added and raise safety awareness. In further consideration of pedestrian/bicyclist safety, a synopsis of *Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice* was added to Chapter 4 of the Final EA under Human Health and Safety.



Exhibit No. 11

Dear All,

5 January 2012

I am writing to protest strongly the widening of the path at Rose Park. I write as a long time devotee of that park.

Rose Park is like one of those happy pictures in children's books where everything is happening. In those books trains are going across trestles, airplanes are flying over head, boats are sailing by, smoke is rising from smokestacks and so on. And so in our much loved neighborhood park we have little kids riding scooters, big guys shooting hoops, plenty of jungle gym, slide and sandbox activity, dogs moseying around, first rate tennis players playing tennis, mothers and nannies hanging out. Add pleasant informal socializing, and a farmers' market in season, and you have a compelling example of what a local park should be.

Here is my point: It has a cheerful and excellent messy vitality that should not be destroyed by having a bicycle commuter thruway run through it. I am speaking about ~~against~~ the widening of the path from P Street to M Street that runs along the side of the park in order to facilitate biking commuters. Of course bicycles are a good idea in our energy-haunted society, but we haven't figured out how to manage them yet. They continue to be dangerous to kids and fearsome to pedestrians. One way not to handle the problem is to turn Rose Park into a speedway.

32-37

There are other routes, particularly the one along Rock Creek Parkway. That one is clearly dangerous for pedestrians at certain times of day. Please don't do that to Rose Park.

32-38

Sincerely yours,

Edith Schafer

1530 30<sup>th</sup> Street, NW

**Response to 32-37**

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA.

At Rose Park, the current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail would accommodate the multiple user types of the path in a safer manner. Trail widening and a smoother surface could further promote use of the trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added and raise safety awareness. In further consideration of pedestrian/bicyclist safety, a synopsis of *Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice* was added to Chapter 4 of the Final EA under Human Health and Safety.

**Response to 32-38**

NPS and DDOT determined that widening of the Rose Park trail was necessary based on field observation and trail counts in order to accommodate all users. Minimum requirements for multi-use trail facilities involve a trail width of eight feet. In consideration of comments received from the Friends of Rose Park, NPS and DDOT propose a six-foot width to resolve concerns.

Ms. Austina Casey, Project Manager  
DC Department of Transportation  
Attn: Rock Creek Trail EA  
55 M Street S.E., Suite 500  
Washington, D.C. 20003

January 6, 2012

Dear Ms. Casey,

I am writing today in opposition to the National Park Service proposal to widen the pedestrian path which runs through Rose Park. I concur with the need to rehabilitate the path but at its current width and in its current location.

Several years ago I participated in an informal study of the number and kinds of users of the path, monitoring its use throughout the day. We found that by far the greatest use of the path was by pedestrians, walkers on their way to and from work in the mornings and late afternoons, neighborhood residents walking their dogs, a small number of joggers and even smaller number of bicyclers. In the course of the daytime hours the path was principally used by significant numbers of parents and nannies with small children walking or pushing strollers to and between the two small playgrounds adjacent to the path. Table 7 of the environmental assessment measured similar use during a two-hour period between 4:45 PM and 6:45 PM on a normal week day in May of last year. According to that table, out of 289 users of the path during that short time frame, 259 were on foot including a small number of joggers, only 30 were bicyclers. In other words, approximately 90 % of the usage is by pedestrian traffic.

My concern as a neighbor and frequent user of the park is that the assessment has failed to take into account the safety issues with regard to pedestrians if the path is widened. In addition there is a very beautiful large tree shading one of the playgrounds which would surely be adversely affected by widening the path.

33-01

33-02

Furthermore, I do not understand the need to designate the Rose Park trail as a bicycle path. Among the stated purposes of the rehabilitation include preserving natural resources, improving the safety of the users of the path and enhancing the connectivity of the Rock Creek Multi-use Trail. Changing the width and/or location of the Rose Park path would not preserve natural resources, not would it improve the safety of the users of the path, since in my personal experience, the major danger I encounter on my walks along the path is from bicyclers riding at a fast pace. As for the connectivity issue, this path is principally used to connect M St. in Georgetown to the Dupont Circle area, neither of which is part of the Rock Creek Trail. The surface streets running alongside Rose Park have very little traffic and should not pose undue danger to bicyclers moving between those two points.

33-03

In addition there is already an excellent and recently re-paved bike path in Rock Creek Park just below and parallel to the Rose Park path. This path already connects to the Georgetown Historic District from K Street and from the paved

### ***Response to 33-01***

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA.

At Rose Park, the current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail would accommodate the multiple user types of the path in a safer manner. Trail widening and a smoother surface could further promote use of the trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added and raise safety awareness. In further consideration of pedestrian/bicyclist safety, a synopsis of *Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice* was added to Chapter 4 of the Final EA under Human Health and Safety.

### ***Response to 33-02***

As stated on page 38 and within Chapter 4 of the Final EA, protection measures and BMPs would be implemented to avoid impacts to all types of park vegetation to the extent possible. Vegetation protection measures for the oak tree near the Dumbarton Street playground area may include development of a tree save plan by an arborist or licensed tree expert, or installation of tree protection fencing. Impacts to the tree's root system would be avoided to the extent possible. If necessary, alternative trail materials and/or narrowing of the trail would be utilized to preserve the tree's roots.

path alongside the ramp next to the Four Seasons Hotel. I can see that a paved walkway alongside the P Street exit ramp would make the Rock Creek Trail more accessible for bicyclers, pedestrians and visitors from the Dupont Circle area, but that does not require traversing Rose Park.

I hope all of these points will be taken into consideration and fully examined before any decision is made with regard to the Rose Park path. Please keep the path at its current width and in its current location.

Sincerely yours,

Teel Oliver  
1313 28<sup>th</sup> St. N.W.  
Washington, D.C. 20007

Cc: Mr. Terry Bellamy  
Director, DC Department of Transportation  
55 M Street, S.E. Suite 500  
Washington, D.C. 2000  
terrybellamy@dc.gov

Mr. Joseph Lawson, Division Administrator  
Federal Highway Administration  
1990 K Street, N.W., Suite 510  
Washington, D.C. 20006  
christopher.lawson@fhwa.dot.gov

Ms. Tara Morrison, Superintendent  
Rock Creek Park  
3545 Williamsburg Lane, N.W.  
Washington, D.C. 20008  
Tara.morrison@nps.gov

Mr. Peter May, Associate Regional Director  
National Park Service  
1100 Ohio Drive, S.W.  
Washington, D.C. 20242  
peter\_may@nps.gov

Mr. Jesus Aguirre, Director  
D.C. Dept. of Parks & Recreation  
3149 16<sup>th</sup> St. N.W.  
Washington, D.C. 20010  
Jesus.aguirre@dc.gov

### ***Response to 33-03***

Under the preferred alternative, the Rose Park trail would be resurfaced along its current alignment. DDOT would not designate the Rose Park trail as a bicycle path. Under the preferred Rose Park trail option, the trail would be resurfaced to a width of 6 feet, which is the required minimum width of DDOT residential sidewalks. According to DDOT policy, bicycle facilities require a minimum width of 10 feet.

To address concerns regarding trail user safety in the Rose Park area, further consideration of pedestrian/bicyclist user conflicts was added to the EA under Human Health and Safety in Chapter 4. According to the FHWA document *Conflicts on Multi-use Trails: Synthesis of the Literature and State of the Practice*, user conflicts on multiple-use trails are a common concern. Research suggests that minimization of user contact in congested areas is an effective measure to reduce conflicts. Accordingly, the preferred alternative at Rose Park is intended to minimize contact between users by providing a wider, smoother trail that would accommodate different uses. Additional suggestions to reduce conflicts on multi-use trails include educational elements in the form of signage or brochures posted at trailheads to identify safety issues and promote trail sharing. During final design of the trail rehabilitation, DDOT and NPS would consider these elements to improve the safety of the trail.

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January 5, 2012

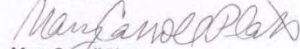
Mr. Terry Bellamy  
Director, DC Department of Transportation  
55 M Street, S.E., Suite 500  
Washington, D.C. 20003

Dear Mr. Bellamy:

I am writing to you to express my support for the position taken for more than a decade by Friends of Rose Park to keep the pedestrian path, which runs through Rose Park from M Street to P Street, at its current width and in its current location. NPS has previously promised our community that the path would be rehabilitated but remain in its current location and at its current width. Any widening of the path that would lead to increased use of bicycles, scooters, rollerblades or skateboards along the path will result in danger to the hundreds of small children and toddlers who travel between all of the play areas in the park on a weekly basis, and to the elderly and other pedestrians who walk along the path at any given time. The initial draft of the Environmental Assessment put out by DDOT and FHA fails to address the major safety issues to pedestrians on the path and to children using the play areas adjacent to the path, which exist if the path is widened to 6 or 8 feet. Thank you.

34-01

Sincerely yours,



Mary Carroll Platt  
2829 O Street, NW  
Washington, DC 20007

***Response to 34-01***

To address concerns regarding trail user safety in the Rose Park area, further consideration of pedestrian/bicyclist user conflicts was added to the EA under Human Health and Safety in Chapter 4. According to the FHWA document *Conflicts on Multi-use Trails: Synthesis of the Literature and State of the Practice*, user conflicts on multiple-use trails are a common concern. Research suggests that minimization of user contact in congested areas is an effective measure to reduce conflicts. Accordingly, the preferred alternative at Rose Park is intended to minimize contact between users by providing a wider, smoother trail that would accommodate different uses. Additional suggestions to reduce conflicts on multi-use trails include educational elements in the form of signage or brochures posted at trailheads to identify safety issues and promote trail sharing. During final design of the trail rehabilitation, DDOT and NPS would consider these elements to improve the safety of the trail.

PEIPC Correspondence  
Keep Private: Yes  
Date Received: 1/11/12

I have commuted from Silver Spring to DC on this trail for many years and I welcome the plans to rehabilitate it.

A trail is only as safe as its most dangerous links and the two most dangerous links on the Rock Creek Trail are the zoo tunnel and the Shoreham Drive crossing. I applaud the plan to widen the path within the tunnel. Long overdue. The proposal for Shoreham Drive, on the other hand, leaves much to be desired. This is a treacherous crossing where high speed traffic often does not slow down for bikers. The danger is multiplied at night. The signage does not tell motorists to stop for cyclists and indeed very few do. Cyclists must wait for an opening and then take their chances against high-speed vehicles.

Things that can be done:

1. Signs requiring drivers to stop.

2. Lights to illuminate the crossing. Solar powered lights have been successfully installed on the Metropolitan Branch Trail.

3. A traffic light activated by cyclists or pedestrians to stop traffic.

35-01

35-02

35-03

There is an additional hazard for bike commuters around 6:30 pm when the one-way traffic becomes two-way again.

This crossing at night is likely a deterrent to many would-be bike commuters. The least that should be done is the installation of lights so that bikers and pedestrians are visible to drivers.

35-04

### ***Response to 35-01 and 35-03***

Since the Draft EA, crossing improvements were constructed at Shoreham Drive as part of the Beach Drive Road Reconstruction Project, in accordance with the FHWA *Manual for Uniform Traffic Control Devices (MUTCD)* standards. The crossing was realigned to include a single crosswalk. Safety was considered in the design of the new crossing, which includes stop signs for trail users and signs to warn motorists in advance of the crossing. Further improvement of the crossing is no longer proposed under the Rock Creek Multi-Use Trail Rehabilitation.

### ***Response to 35-02 and 35-04***

Since the Draft EA, crossing improvements were constructed at Shoreham Drive as part of the Beach Drive Road Reconstruction Project. In general, additional lighting would be excluded from Rock Creek Park project plans because the park is closed from dusk to dawn.

PEPC Correspondence  
Keep Private: No  
Name: Donald Francis  
Address: 2801 Allendale Pl, NW Washington DC, 20008  
Email: donaldfrancis@gmail.com  
Date Received: 1/11/12

I live near the intersection of Brandywine St. and Broad Branch Road. I strongly urge that any trail improvements to the Rock Creek Park trails include the addition of a trail or lane for bicycles and pedestrians from Beach Drive going north along Broad Branch Road. If the Park Service itself cannot construct such a trail, I urge the Park Service to work with the DC Government to allow a widening of Broad Branch Road to permit a shoulder lane for bicycles and pedestrians. Such an improvement would vastly increase safety, and would provide access to the trail along Rock Creek by the many residents in the Forest Hills and Chevy Chase neighborhoods, both primary objectives of the Rock Creek Park Multi-Use Trail Rehabilitation project.

36-01

I've recently seen increased levels of bicycle traffic on Broad Branch Road. I presume in response to the city's increased promotion of bicycle use. However, Broad Branch Road is extremely dangerous to bicyclists and pedestrians because of its narrow and winding nature. I have seen pedestrians seek safety by moving off the road to stand in the woods whenever a car passes. It is only a matter of time before someone is severely injured.

Presently no safe and ready access to the trail along Rock Creek exists for Forest Hills and Chevy Chase neighborhood residents. Such access now requires taking Connecticut Avenue to Tilden Street, which is not a practical option for most. My solution to the situation is to convey my bicycle by car to a parking area along the Rock Creek Bike Path from where I can safely ride - not an eco-friendly or convenient way to go for a bike ride. Neighborhood residents could readily and safely bike or walk to Rock Creek if Broad Branch Road had a trail or bike/pedestrian lane. I for one, and I believe many others, would visit the park much more frequently if this access were available. Plus, since the Rock Creek Trail connects to many other bicycle paths and lanes, a trail or lane along Broad Branch Road would grant access to much of the city for bicyclists in the aforementioned neighborhoods.

36-02

A portion of Broad Branch Road north of Brandywine Street has previously had a blacktopped sidewalk that now exists in very poor condition. Several years ago it was closed from use by the placement of large rocks along the walk. It is an eyesore and closed for no benefit apparent to the average citizen. This portion along Broad Branch Road could be readily rehabilitated. However, despite the greater challenge, I believe the most critical trail addition should be from Beach Drive north to Brandywine Street, since this would permit access from the Rock Creek Trail to sidewalks and to wider, safer residential streets connecting to the adjacent neighborhoods.

Thank you for your consideration.

Donald Francis

### ***Response to 36-01 and 36-02***

As described in Chapter 1 of the EA, the NEPA process involves public agency involvement early in the project development to identify the scope of issues to be addressed and the project area. Based on the early coordination and public outreach, dedicated lanes for bicyclists and pedestrians on the trail were determined to be outside of the scope of the trail rehabilitation. Similarly, widening to accommodate a new lane along Broad Branch road was determined to be outside of the scope of this project. Improvements to all modes of transportation on Broad Branch Road are being considered by DDOT under the Rehabilitation of Broad Branch Road, NW project.

Friends,

Below are comments I've just submitted on my own behalf to NPS re: the Final Environmental Assessment on the Rock Creek Trail (Due Friday 1/13 at <http://parkplanning.nps.gov/project/home.cfm?projectId=34546>). As you can see I am generally supportive of the EA's preferred alternative, but I recommend additional low-cost safety measures for the hazardous Shoreham Hill crossing.

Regards,  
Rick Morgan.

I am submitting these comments as a bicyclist and user of the Rock Creek Trail over four decades. NPS & DC Government's EA is a welcome and long-overdue prescription for addressing a number of vexing problems with the Rock Creek Trail, and I applaud the thoughtful and comprehensive approach embodied in the EA. That said, I wish to recommend a few critical refinements that I believe could further improve this excellent plan for the Trail.

In general, I believe the EA's preferred alternative represents a thoughtful balance of competing objectives in managing the Rock Creek Trail. I particularly support:

- Reconfiguring the Shoreham Hill trail crossing with a single raised crosswalk at the entrance to Rock Creek Parkway;
- Other trail crossing improvements;
- Widening the sidewalk within the Zoo Tunnel;
- Widening of the trail where feasible without damage to vegetation;
- Improvements to the P Street ramp;
- Improvements to Peirce Mill and Rose Park Trails;
- New pedestrian bridge near Zoo Tunnel; and
- Minimization of erosion and damage to vegetation.

Among the most persistent problems with the Rock Creek Trail is the crossing on Shoreham Hill. This intersection has been a particular source of conflict between trail users and motorists over the years. It has been the location of numerous accidents and near misses and yet has been left in an unchanged, hazardous state for decades. Installing a raised crosswalk as proposed is a critical first step, but it is not enough to ensure the safety of trail users who are subjected to high speed traffic coming from two directions during the morning rush hour. I therefore urge NPS to implement the following additional low-cost safety measures at the Shoreham Hill crossing:

- Realign the trail with a single raised crosswalk as proposed, but move the crosswalk not uphill (as planned) but *downhill*, where the sightlines are much better for both motorists and trail users. (see EA Figure 14). The crosswalk should be as far as possible from the point where Cathedral Ave merges with Shoreham Drive so that trail users won't have to cross at the very point where the two roadways merge;
- Reconfigure the Parkway lanes to include a median strip, so that trail users can cross one lane at a time, thus enhancing safety;
- Install a DOT-approved "rectangular rapid flash beacon" to draw motorists' attention to the crosswalk. These devices are user actuated and therefore flash only when the crossing is in use, thereby minimizing inconvenience for motorists. See <http://safety.fhwa.dot.gov/intersection/resources/techsum/fhwa09009.fhwa09009.pdf>;
- Provide appropriate signage on the roadway and trail as well as well-maintained rumble strips for motorists approaching the trail crossing.

37-01

37-02

37-03

37-04

37-05

### ***Response to 37-01, 37-02 and 37-05***

Since the Draft EA, crossing improvements were constructed at Shoreham Drive as part of the Beach Drive Road Reconstruction Project, in accordance with *Manual for Uniform Traffic Control Devices (MUTCD)* standards. The crossing was realigned to include a single crosswalk. Safety was considered in the design of the new crossing, which includes stop signs for trail users and signs to warn motorists in advance of the crossing. Further improvement of the crossing is no longer proposed under the Rock Creek Multi-Use Trail Rehabilitation.

### ***Response to 37-03***

As described in Chapter 1 of the EA, the NEPA process involves public agency involvement early in the project development to identify the scope of issues to be addressed and the significant issues related to the proposed action. Based on the early coordination and public outreach, reconfiguration of the Parkway to include a median strip was determined to be outside the scope of the trail rehabilitation.

### ***Response to 37-04***

New lighting was considered by the project team but dismissed based on standard NPS policy. As described on page 41 of the EA, "Rock Creek Park is closed from dusk to dawn. Furthermore, according to NPS Management Policies (NPS 2006), the NPS seeks to preserve, to the greatest extent possible, the natural lightscapes of parks."

I believe these recommended modifications are consistent with the overall thrust of the EA's preferred alternative and would further enhance the outcomes of planned trail improvements, particularly with respect to safety of trail users.

Thank you for considering my recommendations. I look forward to the important improvements to the Rock Creek Trail consistent with the EA.

Rick Morgan  
5902 32<sup>nd</sup> St, NW  
Washington, DC 20015



PEPC Correspondence  
Keep Private: Yes  
Date Received: 1/12/12

I have logged over 15,000 miles commuting to work year-round by bicycle for the past more than 8 years. I pick up Beach Drive at about Tilden Street and ride to Rock Creek and stay on that past Virginia Ave. Though I mostly bike, I also run the trail 2-8 times per month. I have reviewed the Rock Creek Park Multi-Use Trail Rehabilitation project (which is the trail I ride) and the written plan ("Plan") and have a number of comments.

Of course, the trail is in dire need of attention, and I welcome any improvement. After all, any

improvement is better than none at all. In summary, however, my feeling is that the Project has not been adequately considered and as a result proposes insufficient measures to properly meet its stated goals of, inter alia, safety and visitor experience as a result of "narrow trail widths" that impede trail users and due to the "large number of visitors." (Nov. Plan, pp. 1-2.) I liken the proposed measures to the old adage of the boy sticking his finger in the dyke? the Project does not do enough to get to where it needs to be since it is not commensurate with the amount of traffic on the path. In addition, while the Plan is well written, it seems to have several major flaws. There is no discussion of whether the proposed widening will meet the current trail traffic needs, and the Plan misinterprets the one document it relies on to set the trail width. It would be a shame to spend time, money and energy on a plan that cannot satisfy usage for years to come.

38-01

38-02

#### FIRST ISSUE ? NO FACTUAL BASIS

An overriding concern is that the Project does not appear to be tied to any factual information about the path or its users. My uncertainty here is because the Project does not clearly identify how data was gathered. During the scoping process, a few meetings were held, and they received 600 comments. (Nov. Plan, pp. 12-13, 167-69.) They also conducted a one-time 2-hour study to count the number of trail users at three locations on the trail. (Nov. Plan, p. 83.) It is not clear how the Project identified the various impact areas, but it seems it was from public comment. (Nov. Plan, pp. 13-15.)

Thus, the Plan is mostly based on the passive identification of impact areas through public comment. Except for the single 2-hour study, the Plan administrators have not taken any active steps to identify impact or hazardous areas or otherwise design the trail. Notably, the Plan does not mention any of the following: (a) survey of trail users (i.e., bike riding, running and walking) other than at 3 discrete points; (b) use of the path by the Plan administrators; (c) study of trail usage on the weekend, morning, in the rain, at night, etc. (i.e., outside of the 2 hours noted in the Plan); (d) any study of trail users at blind spots, areas that gather water, sediment or loose dirt, or other hazardous areas; (e) a study of any actual impediment to trail use (such as other trail users); or (f) information about accidents, incidents and/or safety (whether filed with the police or not).

38-03

But most of all, I expected that the Project would have solicited the input of those who know the most about the path? the trail users themselves. The Project has had two meetings in the last year. And it is quite astonishing to me that there have been NO notices posted on the path, despite my email to Jim Sebastian 6 months ago. I expect that failing alone would be sufficient for a taxpayer to challenge these entire proceedings. When DC was redoing the playground at one of the local public schools, they held literally dozens of meetings for a much less complicated project. The absence of repeated meetings is unacceptable. I expect that future developments of this plan will be posted on the trail.

38-04

In retrospect, it must be obvious that a plan cannot be properly constructed without first having an understanding of how the trail is being used. How can someone design a trail if they lack the experience of a trail user? How would you know how wide to make the path to meet the current demand, not to mention projected use of the path?

#### SECOND ISSUE ? THE PROPOSED PLAN DOES NOT MEET CURRENT TRAIL TRAFFIC

The Plan makes absolutely no mention of how it arrives at a trail width of 8-10 feet. Rather, it refers to a single AASHTO policy issued over a decade ago, to justify the 8 and 10 foot trail widths. (A Policy on

38-05

#### Response to 38-01

Early in development of the project, the cooperating agencies identified the need to improve accessibility, safety, and visitor experience of the Rock Creek Park Multi-Use trail. Through preliminary studies, environmental assessment, agency coordination, and public outreach, a preferred alternative is proposed to address the project needs while maintaining the park's natural and cultural resources. The Rock Creek Multi-Use Trail Rehabilitation EA is in full compliance with the requirements of NEPA; the Council on Environmental Quality (CEQ) Regulations (40 CFR 1500-1508); FHWA Technical Advisory T6640; the NPS NEPA compliance guideline (DO-12), and the National Historic Preservation Act of 1966, as amended. The work is also compliant with NPS Management Policies.

#### Response to 38-02

Trail widths under the preferred alternative were developed as a result of multiple field walks, agency coordination and public outreach. The proposed width of the Rock Creek Multi-Use trail would be six to 10 feet, based on physical and environmental constraints. The proposed width is in accordance with multi-use trail criteria established by AASHTO, DDOT and NPS and is expected to enhance safety and the visitor experience on the trail.

#### Response to 38-03

The public scoping process was used to help determine the scope of issues to be addressed and for identifying the significant issues related to the project. While public scoping helped in determining project issues and concerns, it was not the only resource utilized in planning for rehabilitation of the trail. Planning also included coordination between members of a multidisciplinary team and investigation conducted by design professionals. Planning for the project involved individuals with detailed knowledge of the project area. The 2-hour study was used to evaluate points along the trail. However, existing trail counts and data collected by DDOT over time was also used to evaluate points along the trail. Further, additional areas of concern were called to attention during the public comment period.

Geometric Design of Highways and Streets, American Association of State Highway and Transportation Officials, cited at Nov. Plan, p. 177.) The AASHTO Policy wasn't made readily available to the public, but its guidelines appear in an FHA report. (Designing Sidewalks and Trails for Access, The U.S. Dept. of Transportation, Federal Highway Administration, www.fhwa.dot.gov/environment/sidewalk2/sidewalks214.htm, June 21, 2011 (copy attached). See Nov. Plan, pp. 33, 186.)

But, the Plan does not rely on the AASHTO Policy consistently. In some instances, the Plan states that the Policy provides for an 8-foot trail width as the minimum recommended width. (Nov. Plan, p. 33.) But in other instances, the Plan says that a 10-foot trail width is the minimum acceptable practice. (Sept. Plan, p. 15; Nov. Plan, pp. 27, 37, 153.)

38-06

In addition, the AASHTO Policy doesn't support either of those widths. Instead, the Policy says that a shared-use trail should have a minimum width of 10 feet, and that a minimum of 8 feet "may be used on shared-use paths that will have limited use." Moreover, for trails with "heavy" volumes of users, the trail width should be 12-14 feet. (FHWA, section 14.6, page 8 of 11.) And, it suggests that "if volume and space permits, bicyclists and pedestrians should have different lanes or pathways." (FHWA, section 14.3, page 3 of 11.)

Based on my experience, I would expect the path to have heavy volume and justify different pathways for bicyclists and pedestrians. For instance, there are typically groups of 2 or more runners who tend to take up most or all of the trail. Even single runners run along the middle of the path while listening to music, talking or generally not paying attention (such as in a workout zone ? I will note that in my experience hikers have to be more aware of their surroundings because of the added speed and dangers). There can be very little room for a bike to pass safely, and it can be difficult to judge if there is sufficient passing distance to oncoming trail users. Just the other morning, a person was on one side of the path with her dog

on the other side of the path and the leash extending across the entire path. I feel strongly that dual paths are needed to separate bikers and runners at the busier portions of the trail. The Plan appears to agree that there is "heavy" volume on the trail, citing to "a large number of visitors." (Nov. Plan, p. 2.) A dual path would clearly delineate a border between oncoming trail users and encourage users to stay on the proper side of the path.

38-07

However, the Plan makes absolutely no mention of a 12-14 foot trail width, or having different pathways for bicyclists and pedestrians. It also does not provide any considered analysis as to why a larger trail width is not necessary, and makes no mention of why the environmental impact study did not consider a width greater than 10-feet. A study should reveal whether a wide dual path is necessary to meet trail volume, at least along portions of the trail.

#### THIRD ISSUE ? THE PLAN IN A VACUUM

The Plan makes mention of a number of local and federal laws, rules, regulations, and goals, and evaluates the impact of the Project pursuant to those Laws. (Nov. Plan, pp. 8-11.) But the Plan fails to consider the Project as part of a greater urban city environment, and the overall impact that a wider trail will have on that urban city environment. For instance, it does not consider the positive environmental impact that a 12-14 foot trail would have, such as increasing the number of environmental-friendly commuters and reducing the number of vehicles. It would seem that such an analysis would be warranted by the National Environmental Policy Act referenced in the Plan. It is evident that alternative modes of transportation have gained wide public support in recent years. The tremendous success of DC's Capital Bikeshare program has increased trail users and evidences the relationship between trail access and trail usage. By considering the impact on the trail in a vacuum, the Plan has not properly evaluated the cited laws.

38-08

#### FOURTH ISSUE ? TRAIL BELOW ROSE PARK

The Plan stops at P-street and does not include the trail section that extends between Dupont Circle and Virginia Avenue. That is very surprising since that section is probably the busiest, narrowest and most dangerous section of the trail. It is in dire need of improvement and far below the AASHTO

38-09

#### Response to 38-04

Three public meetings were held for the project. Public notices were posted on the Planning, Environment and Public Comment website, the DDOT website and Facebook pages, and advertised in The Washington Post and The Current newspapers. Notice was sent by email or posted to list-servs of Advisory Neighborhood Commissioners, community groups, and potential stakeholders, including individuals and groups who previously expressed an interest in the project.

#### Response to 38-05, and 38-06

As per AASHTO guidelines, the appropriate paved width for a shared-use path is dependent on the context, volume and mix of users. The minimum paved width for a two directional shared-use path is 10 feet. A path width of eight feet may be used for a short distance due to a physical constraint such as an environmental feature, bridge abutment, utility structure, fence and such. The EA was reviewed for consistency among references to the minimum lane widths recommended by AASHTO:

- On page (page 33 of the Draft EA) the text was revised to read "an eight-foot width, the minimum multi-use trail width recommended by AASHTO for short distances under physical constraints."
- On page 29 (page 25 of the Draft EA) the 10-foot width refers to Beach Drive.
- On page (page 37 of the Draft EA), the EA refers to "a standard 10-foot width, which is recommended by AASHTO." This statement is correct and no change was made.
- On page 155 (page 153 of the Draft EA) the text was revised to read "an eight-foot width (the minimum multi-use trail width recommended by AASHTO for short distances under physical constraints)"

#### Response to 38-07

As described in Chapter 1 of the EA, the NEPA process involves public agency involvement early in the project development to identify the scope of issues to be addressed and the significant issues related to the proposed action. Based on the early coordination and public outreach, separate lanes

recommended width. Recent maintenance work pushed large vehicle guiderail posts into the already narrow trail, causing safety issues and an awkward seam and angle where the new pavement meets the old. In addition, overgrowth of brush further narrows the trail at this section (as well as just north of Porter Street) and needs to be cut back more frequently than current maintenance provides. There is little room to the sides of the trail since it is bordered by the road on one side and a steep gradient on the other side. The trail needs to be substantially widened.

It is also surprising that the Plan pays so much attention to Rose Park while completely ignores the true path below. The 2-hour study confirms that Rose Park is simply a casual walking path. (Nov. Plan, p. 84.) It is mostly used by local residents in the busy Georgetown district, and is not truly part of the multi-use path. Rather, it is a connection for bikers and runners to get to the Rock Creek path. Some trail users may enter/exit at that location, but most do not.

#### FIFTH ISSUE - LIGHTING

A number of trail users have suggested that lights be placed along the path to improve safety and access. In response, the Plan notes that lights would have a negative impact on the natural landscape, and that the park is closed from dusk to dawn. (Nov. Plan, p. 39.) Consequently, the Plan summarily rejects the use of lighting.

But, the Plan does not consider that the NPS Management Policy (cited by the Plan) must account for environmental concerns that are not even remotely at issue here, such as caves and deep water bodies having blind fish. (See NPS policy, p. 57.) And contrary to the Plan's statement that "the NPS ? does not install lights along trails on its property," the NPS Management Policy leaves the decision of artificial lighting "to the discretion of the superintendent and is made through the planning process." (NPS policy, p. 57.)

The Plan's improper interpretation of NPS policy and complete lack of consideration is not acceptable to me and should not be acceptable to our elected officials. Certainly, any impact of artificial lighting would be minimal, especially since much of the trail is directly adjacent to (or within sight of) a busy roadway and the entirety of the trail is in the middle of an urban environment. And the Plan fails to weigh the negative impact of the lighting, if any, against the certain positive impact of having environmental-friendly transportation, removing bicycles from the streets, and the huge increase in trail safety (as the days get shorter, I have seen mothers with baby carriages or toddlers racing to get off the trail as night falls).

To minimize the impact of artificial lighting, the lights can only be used at reasonable times. For instance, the lights can be slowly turned off at 9pm when trail use would be reduced or negligible.

The use of artificial lighting needs to be evaluated. We should not blindly adopt the dusk-to-dawn hours, which perhaps were established in a different era with drastically different circumstances and considerations.

#### SIXTH ISSUE ? HAZARDOUS ZONES

There are a number of hazardous areas along the path which are not specifically identified in the Plan. I. Blind Spots. Trail users cannot see oncoming users at a number of locations along the trail, as set forth below. Some of these blind spots are not discussed in the Plan as being subject to widening or otherwise being fixed. Widening the trail would only slightly improve visibility, and the path needs to be redesigned in these areas to improve visibility and safety.

(a) One blind spot is at the foot bridge just south of the tunnel. There is brush along the trail that blocks visibility, such that persons on the bridge and those approaching the bridge from the zoo cannot see each other. And even without the brush, trail users tend to only focus on what is directly ahead of them and do not look to the side. Most trail users tend to cut the 90-degree angle by crossing into the path of oncoming users.

The Plan's response to this is to widen the bridge to 8 feet. It is not clear how that width was chosen, as it is well below the 10-foot minimum acceptable width set forth in the AASSTO Policy discussed above.

38-10

38-11

38-12

for bicyclists and pedestrians on the trail were determined to be outside of the scope of the trail rehabilitation.

#### *Response to 38-08*

The preferred alternative for the Rock Creek Trail (six- to 10-foot widening) was selected because it provides the widest range of beneficial uses while achieving negligible other undesirable and unintended consequences. A 12- to 14-foot trail would result in additional impacts which could result in impairment of the park's resources. In addition, physical features of the park are restrictive of 12- to 14 foot widening throughout most of the trail alignment. To address the impacts of the project as part of the greater urban city environment, the EA provides cumulative impacts analysis (page 91).

#### *Response to 38-09*

Based on early public agency involvement and public outreach, an extension of the trail between Dupont Circle and Virginia Avenue was determined to be outside of the project area of the trail rehabilitation.

#### *Response to 38-10 and 38-11*

New lighting was considered by the project team but dismissed based on the standard NPS policy. To enhance safety on the trail, the preferred alternative would include widening, trail user and vehicle safety improvements, roadway crossing improvements, and signage to promote safety.

#### *Response to 38-12*

Design for the rehabilitation of the trail would incorporate elements to address blind spots/hard turns to the extent feasible. Project designers have visited the trail to identify potential problem areas and make suitable modifications. Since the Draft EA, proposed actions for the trail over Rock Creek have been modified. Five feet from the existing bridge, a new bridge is proposed which would have a 10-foot clearance to accommodate trail

And widening the bridge would likely not cure the visibility issue. A separate bridge is needed that is curved to form a more natural line of travel with the path.

It is further noted that every foot bridge on the trail has a hard turn at one end, including the two bridges just south of Peirce Mill (one of which requires users to make a 90-degree turn or risk entering the busy parkway); the one just north of the zoo; the one at the bottom of the large hill by Woodley Park, and both ends of the bridge just north of the Dupont Circle exit. Each of those hard turns should be eliminated by having the bridge form a better line of travel with the path. They pose safety issues and have high incidence of trail user conflicts. There is no mention of widening those bridges, but even that would still require a hard turn which causes user conflicts and reduces safety.

(b) A second blind spot is at the hard turn just north of the Dupont Circle exit passing under the roadway overpass. I frequently encounter trail users passing at that section or on the wrong side of the path.

(c) Additional blind spots are at the three intersections with the roadway at the Dupont Circle and K-street exits. Each of those spots has the path encountering the roadway at a hard or unusual angle, such that visibility is very low. Stopping for car traffic can be dangerous, especially at the Dupont exit where cars are coming fast around a blind turn and a bicycle starts slowly from a complete stop (thereby requiring a longer crossing time).

(d) Another blind spot is at the underpass to the Whitehurst freeway. Both sides of the underpass have low visibility and high traffic.

(d) Another blind spot is at the underpass to Porter Street.

38-12

2. Dirt and Water Pooling. Certain areas along the trail seem to gather sediment from the creek, loose dirt, water and/or ice. These include at the foot of the hill at Woodley Park, at the woods section just north of Porter street and at the underpass at Porter street, across from the cemetery just south of Woodley Park, at the hard turn just south of the maintenance road at the zoo, and a few other spots. It is not clear if these areas will be tended to as part of the Project.

38-13

**SEVENTH ISSUE ? CONNECTIVITY**

There are a few other social paths that were not addressed in the Plan:

1- Peirce Mill South: There is a social path created South of the restrooms (which are located just south of the Peirce Mill). That path is nearly always muddy or iced over, but is not identified in the Plan. A paved path is desperately needed, even if it does not follow the social path.

2- Dupont Circle: Many trail users enter the path from Dupont Circle, though that is not addressed in the Plan. There is a very narrow and rocky social path extending alongside the exit ramp, but that is not suitable for bicycles and many runners and bicycles travel along both sides of the roadway ramp. To improve safety, the roadway should be widened and bike lanes should be marked on both sides of the roadway. The bike lanes should be separated from the roadway by a barrier to avoid vehicles cutting into the bike lanes to make those hard turns.

3- Cathedral Ave: There is no path alongside Cathedral Avenue, and the sidewalks are narrow and do not extend the entire length of Cathedral Avenue to Connecticut Avenue. Cathedral Avenue itself has parked cars during rush-hour and does not have a bike lane.

38-14

**EIGHTH ISSUE ? THE NATIONAL ZOO**

Trail users have complained that the zoo gates should not be locked at dusk. In response, the Plan notes that the zoo accreditation requires that the gates be locked, and instead proposes that the tunnel be redesigned to create a 5-foot path within the tunnel at a substantial cost and inconvenience. (Plan, pp. 27, 38.) Of course, while any increase in size is appreciated, the 5-foot path is well below the minimum standard recommended by the AAHSTO Policy. And the Plan does not evaluate the safety of car travel on a reduced lane size or closer to the tunnel wall at one side.

The Plan also does not evaluate the borders of the zoo, whether the trail extends onto zoo property, and whether the trail can be guided around the zoo borders. The path certainly does not come close to any animal exhibits. So consideration should be given to moving the gates closer to critical areas of the zoo, such as where the trail crosses the service road. To the extent there are less-critical zoo maintenance

38-15

users. Between the Beach Drive tunnel and the new bridge, there would be a newly paved area which would help to alleviate user conflicts in this location.

Additional realignments are proposed south of Peirce Mill and at the approach to the Devil's Chair Bridge to promote trail user safety. Also, proposed grading would improve sight lines on the trail. Further details of realignment and trail grades are to be determined during design phases of the project. Where modification of the trail alignment and/or bridge crossings is not an option, signage could be included in the project design to promote safety.

**Response to 38-13**

The preferred alternative would include raising the vertical profile of the trail as necessary to eliminate ponding and slope stabilization to improve soil erosion conditions. Improvement of the trail in this manner is proposed along a 1,100 foot segment of the trail south of Peirce Mill. Further details of drainage improvements are to be determined during design phases of the project.

**Response to 38-14**

Based on early public agency involvement and public outreach, amendments to the social trails at Peirce Mill South and Cathedral Ave. were determined to be outside of the scope of the trail rehabilitation. The requests have been forwarded to the DDOT Bicycle Advisory Council. Proposed improvements to both sides of the P Street ramp (Dupont Circle) are described in the EA under Section 2.3.3. Elements Common to Action Alternatives.

**Response to 38-15**

Redesign of the trail through the Beach Drive tunnel is proposed in order to promote safety. As described on page 29 of the EA, the sidewalk along the west wall of the Beach Drive tunnel is proposed to be widened from 2 feet to approximately 4 feet. To promote safety in this area, a low profile guardrail would be constructed to provide trail user/vehicle separation and signage would be posted at the tunnel approaches. The National Zoo and the park are

facilities by the trail, those can be separately gated. If the gates can be moved, the trail can continue at its existing location and there would be no need to revise the tunnel.

#### NINTH ISSUE ? TRAIL USER SAFETY

I suggest several measures for increasing user safety. A traffic crossing light should be installed where Rock Creek joins Beach Drive (at Woodley Park). It can be very difficult to safely cross the roadway at that point, and trail users often gather there and compete with one another to safely cross. Traffic crossing lights should also be considered for the Dupont Circle exit, as well as at the road crossing at M-street and 2 crossings at Whitehurst Freeway (K-Street), especially if the angle at which the path meets the road cannot be improved.

38-16

In addition, emergency call stations should be installed along the path. And, consideration should be given to prohibiting trail users from listening to music. The music makes them less aware of their surroundings, including bike bells, and they tend to drift to the wrong side of the trail.

38-17

#### TENTH ISSUE - CONSTRUCTION PHASE

The Plan does not have much discussion of the company that will perform the work. In the past 1-2 years, there has been some patchwork done on the trail that was simply poor. Specifically, about 100 yards of the trail was re-paved just north of the P-street (Dupont Circle) exit. The re-paved path is extremely bumpy and has sections with large side lips (once a bicycle goes off the trail, a large lip can make it dangerous to get back on the path, as I've learned firsthand). In addition, a small section under the bridge was paved (and the cobblestone removed), but creates a line of travel which is not appropriate. Also, the sidewalk ramps placed at Virginia Avenue are not properly aligned with each other, requiring bikers to move left/right rather than taking a straight line (they should really be redone). Thus, it is respectfully suggested that the company which is contracted to repave the path have experience with designing and paving bicycle paths.

38-18

In addition, all of the construction in the past few years has not been efficient. They started work on a first area of the trail, then started working on a second area while the first area sat unworked for weeks or months. And, the "walk your bike" signs were blocking the path. And, the trail was closed or "walk your bike" was started too early and ended too late. Just a few weeks ago, they posted "walk your bike" signs for the 150 or so yards just north of the Dupont Circle exit. Yet, there was no obstruction on the trail that would justify those signs for at least a week.

The construction phase does not seem to account for the trail users. Currently, there is a large 8-foot wooden fence built around construction equipment being housed at the intersection of Beach Drive, Cathedral Avenue and Rock Creek Parkway. Trail users cannot see around the wooden enclosure, and it is particularly hard to see if any cars are coming down Cathedral Avenue traveling south during the morning commute.

#### ELEVENTH ISSUE - MAINTENANCE

Brush along the sides of the trail is currently cut back 1-2 times per year. That needs to be doubled. Snow and tree removal has been good with a few exceptions. Maintenance guidelines should be put in place that requires the use of professional pavers (per the eleventh issue above).

38-19

#### CONCLUSION

I look forward to hearing from you on these issues.

closed from dusk to dawn. Therefore, modification of the zoo gates to accommodate users past dusk would be inconsistent with National Zoo and NPS policy.

#### *Response to 38-16*

New lighting was considered by the project team but dismissed based on the standard NPS policy. To enhance safety on the trail, the preferred alternative would include widening, trail user and vehicle safety improvements, roadway crossing improvements, and signage to promote safety.

#### *Response to 38-17*

Based on early public agency involvement and public outreach, elements such as emergency call stations were determined to be outside the scope of the trail rehabilitation. Signage posted throughout the trail to promote safety could recommend that trail users remain alert to avoid conflicts.

#### *Response to 38-18*

The most qualified contractor that is within the project budget and that can feasibly construct the project will be selected. During construction DDOT would monitor the contractors to ensure that project plans are carried out properly.

#### *Response to 38-19*

Maintenance of Rock Creek Park is overseen by the NPS. The request has been forwarded to Rock Creek Park Management.

PEPC Correspondence  
Keep Private: Yes  
Date Received: 1/12/12

I am a bike commuter who works at the National Zoo and am an avid runner. I support the most comprehensive plans for renovating the Rock Creek and Beach Drive trails, promoting safe and environmentally-friendly multiple-uses of the facilities.

As a bike commuter:

1. Along Piney Branch, I have frequently had cars drive within a foot of me and there is no shoulder nor trail on which I can more safely ride. I have had drivers even yell at me to get on the path, not knowing that there is no path on which I should go. I would also urge that if this road is furnished with a full pathway, that that pathway have ramps at either end so that bicyclists, strollers, wheelchairs, etc can easily access it.

39-01

2. From Pierce Mill to Rock Creek Parkway on Beach Drive and on the Parkway from P Street to K Street, the pathway is far too narrow for multi-users. Nowadays, many runners use headphones and are not aware of the location of other users. Safely passing these users is precarious. At the same time, many runners and pedestrians (and worse yet, pedestrians with strollers) use the path side by side one another, again, making passing difficult. When someone is approaching from the other direction, the situation becomes even worse. Anything that can be done to widen the pathway, especially from P Street to K Street where there is no grass or other space to utilize, would be very helpful.

39-02

Between running and biking, I am on the trails and pathways anywhere from 6-25 hours a week, and typically use them at least five days a week. This park is one of the DC area's greatest assets. It has been decisive in terms of where I live in the city, and in terms of my exercise and recreation regimen. Anything that can be done to improve them for an increasingly active and bike-using community will be monies well-spent.

### ***Response to 39-01***

The preferred alternative would involve restriping of Piney Branch Parkway and widening of the Piney Branch Parkway trail to a width of six to eight feet. The proposed trail would include ADA-compliant ramps to connect the trail with Arkansas Avenue and the Rock Creek Park Multi-Use Trail.

### ***Response to 39-02***

Under the preferred alternative, the Rock Creek Trail would be resurfaced and widened to a minimum 6-foot width and a maximum 10-foot width, depending on environmental and physical constraints. Resurfacing and widening is proposed from the Broad Branch/Grove 2 North parking area to P Street. From P Street to M Street, the preferred alternative would include resurfacing and widening the Rock Creek trail to a maximum six-foot width.

As described in Chapter 1 of the EA, the NEPA process involves public agency involvement early in the project development to identify the scope of issues to be addressed and the project area. Based on the early coordination and public outreach, trail construction or rehabilitation south of M Street was determined to be outside the scope of the trail rehabilitation.



PEPC Correspondence  
Keep Private: Yes  
Date Received: 1/12/12

I attended the public meeting on this topic in December. I have attempted to read the full assessment and I have walked Rock Creek multi-use and foot trails contemplating the choices provided, my fellow human users of the park, the natural environment and wildlife, the challenges NPS and DDOT face, and the decisions that must be made.

Rock Creek is a neighbor to me, but I must admit that only since my retirement I have begun to appreciate more its loveliness and specialness. Before that time, I was like many occasional users, unthinking and oblivious to meaning of this treasure in the center of our city. My walks and contact with the good and knowledgeable NPS rangers and folks who devote their spare time to clean Rock Creek of trash, to rebuild the foot trails, and to advocate for its care (Rock Creek Park Conservancy and PATC) have helped me to understand more and thus to speak out.

1. With regards to Alternatives (No action, #2, and #3), I align myself with those for Alternative #2. It proposes positive changes that appear to address the major concerns within the historical mission of the park.

2. With regards to the Pierce Mill "social trail", I agree with the partial paving of the "social trail" to create a multi-use trail that will connect users from Broad Branch or Pierce Mill without having to go through the parking lot, but keeps to most of the original multi-use trail. Please note that the "social trail" was blazed for the Western Ridge trail. That was the beginning of foot travel, I imagine. Then the park (or someone) added picnic tables. And so more human traffic was encouraged. So, I further propose that NPS, consider reclaiming for nature the area around the multi-use paved trail, do not allow an unpaved foot trail in that area, plant more trees, bushes etc. (I will gladly help!) Reblaze the trees for the Western Ridge trail in that section so that users walk the short distance on paved surface.

3. With regards to Rose Park, I agree that the path needs to be repaved and 6 to 8 feet should be the maximum width. Bikers should be encouraged to use the lower trail along the parkway and walkers should be encouraged to use Rose Park trail. Signs would help.

Along with the construction changes, I hope the NPS and DDOT will also consider the following:

1. Emphasize through better and bolder signage (at least) the laws (on litter, pets on leash, alcohol etc) and the rules for park and path use (right of way, single file when necessary, walking bikes in tight spots, speed, etc). State parks do, why not in our Federal City? 2. Review the need for so many small car parks and picnic groves (such as those between Broad Branch and Military Road on Beach Drive). We residents and "visitors" of all ages need more meadows and forest areas. Would benches serve as nice stopping points?

40-01

40-02

I had photos of signs that I have seen in other state and regional parks, but I'm sure you all have seen some as well. If you want my collection and more comments, contact me.

Finally, please do not make Rock Creek a typical city Park. Please keep it rustic and natural and environmentally healthy as possible.

### ***Response to 40-01***

Under the preferred alternative, signage is proposed to promote safety on the trail. In accordance with *NPS Management Policy 2006*, "only those signs necessary for visitor safety or to protect wilderness resources, such as those identifying routes and distances, will be permitted. When signs are used, they should be compatible with their surroundings and the minimum size possible."

### ***Response to 40-02***

As described in Chapter 1 of the EA, the NEPA process involves public agency involvement early in the project development to identify the scope of issues to be addressed and the significant issues related to the proposed action. Based on the early coordination and public outreach, additional small car parks and picnic groves were determined to be outside of the scope of the trail rehabilitation.



RECEIVED JAN 25 2012

Board Members  
David Dunning, President  
Dr. Russell Bridges, Treasurer  
Katie Sexton, Secretary  
David Abrams  
Toni Brody  
John Donvan  
Anna Fuhrman  
Cerhyl Gray  
Marjorie Heiss  
Rob Hetem  
Pamla Moore  
Jenny Mottershead  
Victoria Rigby  
Dave Salwen  
Leslie Wheelock  
Jill White

January 20, 2012

Director Terry Bellamy  
D.C. Department of Transportation  
55 M Street, S.E., Suite 500  
Washington, D.C. 20003

RE: Rose Park Pedestrian Path  
and the Rock Creek Multi-Use  
Trail Rehabilitation project

Dear Director Bellamy:

I am writing to you on behalf of the Board of Directors of Friends of Rose Park, Inc. to follow-up on our request to keep the pedestrian path which runs through Rose Park at its current width of 4-5 feet and in its current location, running along the top of the Rock Creek Parkway hillside.

Friends of Rose Park, Inc. submitted the attached **Written Comments Submitted by Friends of Rose Park, Inc. to the Rock Creek Multi-Use Trail Rehabilitation Environmental Assessment Issued November, 2011** to NPS and DDOT in regard to the ill-conceived recommendation of the Rock Creek Multi-Use Rehabilitation project Project Team to widen the path to 6 feet.

Friends of Rose Park, Inc.  
www.roseparkdc.org  
c/o David L. Abrams, 1410 26<sup>th</sup> Street, N.W., No. 1, Washington, D.C. 20007  
(202) 351-9921 (C)  
jake.chase@juno.com



For the past 14 years, Friends of Rose Park has advocated for safety reasons to keep the pedestrian path at its current width. Widening the path to even 6 feet will create a smooth-surfaced "superhighway" through the park, allowing bicyclists to increase their speed, posing a greater danger to the health and safety of children, senior citizens and other pedestrians who use the path in far, far greater numbers than bicyclists.

41-01

The Environment Assessment regarding the rehabilitation of the Rose Park pedestrian path takes the position that the Rose Park section of the pedestrian path should be widened to 6 feet. As our *Written Comments* clearly evidence, the project team's recommendation to widen the path to 6 feet is based on false and erroneous data and false and outright wrong information. The project team which wrote the Environmental

41-02

Assessment created a document which fails to meet the standards required by Federal law, at least the portions of the document regarding the Rose Park recommendations. The health and safety of the small children and other pedestrians using the path, especially in the areas of the path which runs between six separate and distinct play areas, was totally disregarded and omitted by the people who wrote the Environmental Assessment, in clear contravention of existing law and regulations.

41-03

As our *Written Comments* importantly evidence, neighbors, park users, organizations and elected officials, representing *thousands* of Georgetowners, support keeping the path at its safe, current width. I use the word "thousands" with purposeful intent. When you look at the fact that the groups which have historically supported our position, groups such as the Citizen's Association of Georgetown, an organization of over 1,200 members, as well as our local ANC2E, and hundreds of individual neighbors and park users, the numbers add up and must not be discounted by your agency.

In the past, NPS Director Robert Stanton and Rock Creek Park Superintendent Adrienne Coleman fully and completely supported keeping the path at its current width. The Rose Park pedestrian path recommendations in the current Environmental

Assessment are a disservice to the park, the neighborhood, and the community and, if implemented, will create a tremendous public safety hazard. If the path is widened, notice is hereby given that a public safety hazard will be created by your agency.

41-04

#### ***Response to 41-01 and 41-04***

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA.

At Rose Park, the current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail would accommodate the multiple user types of the path in a safer manner. Trail widening and a smoother surface could further promote use of the trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added and raise safety awareness. In further consideration of pedestrian/bicyclist safety, a synopsis of Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice was added to Chapter 4 of the Final EA under Human Health and Safety.

#### ***Response to 41-02***

NPS and DDOT determined that trail widening was necessary based on field observation and trail counts in order to accommodate all users. The preferred alternative includes widening of the Rose Park Trail to six feet, in consideration of public comments regarding Rose Park.

#### ***Response to 41-03***

To address concerns regarding trail user safety in the Rose Park area, further consideration of pedestrian/bicyclist user conflicts was added to the EA under Human Health and Safety in Chapter 4. According to the

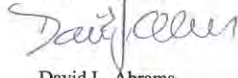
January 20, 2012  
Page Three of Three

We are asking that you act in your official capacity to change the recommendation contained in the current Environmental Assessment to widen the path to 6 feet and advise us in writing that while the path will be rehabilitated that it will remain in its current 4-5 foot width.

I am respectfully requesting that you respond to this letter as quickly as possible, because if the decision is made to widen the path please be advised that Friends of Rose Park will continue our exploration of taking alternative measures to keep our neighborhood infants, toddlers, older children, senior citizens and park users safe when using the path.

I look forward to receiving your written reply to this letter and your affirmative written pledge that while the path will be rehabilitated that it will be kept at its current width.

Sincerely yours,



David L. Abrams  
For Friends of Rose Park, Inc.  
1410 26<sup>th</sup> Street, N.W., No. 1  
Washington, D.C. 20007

copy to:

The Honorable Eleanor Holmes Norton  
The Honorable Jack Evans  
The Honorable Tom Birch  
DPR Director Jesus Aguirre

FHWA document *Conflicts on Multi-use Trails: Synthesis of the Literature and State of the Practice*, user conflicts on multiple-use trails are a common concern. Research suggests that minimization of user contact in congested areas is an effective measure to reduce conflicts. Accordingly, the preferred alternative at Rose Park is intended to minimize contact between users by providing a wider, smoother trail that would accommodate different uses. Additional suggestions to reduce conflicts on multi-use trails include educational elements in the form of signage or brochures posted at trailheads to identify safety issues and promote trail sharing. During final design of the trail rehabilitation, DDOT and NPS would consider these elements to improve the safety of the trail.

RECEIVED FEB 15 2011  
CMB

February 10, 2011

Mr. Terry Bellamy  
Interim Director  
D.C. Department of Transportation  
2000 14<sup>th</sup> Street, N.W., 6<sup>th</sup> Floor  
Washington, D.C. 20009

Dear Mr. Bellamy:

I am writing to you in support of the position taken by Friends of Rose Park, the ANC 2E and the Citizens Association of Georgetown in regard to the Pedestrian Path, which runs through Rose Park in Georgetown.

In the second Environmental Assessment, which is being conducted in regard to the Rock Creek Park Multi-Purpose Trail, you must consider that the 3,000-foot segment of the Rose Park Pedestrian Path is a separate Pedestrian Path, which runs through Rose Park and must not be considered as a multi-use trail. The Pedestrian Path must be repaired but it must be repaired "as is", i.e., in its current location and at its current width. It must not be moved or widened for any purpose.

42-01

Thank you.

  
Mary Carroll Platt  
2829 O Street, NW  
Washington, DC 20007

***Response to 42-01***

Rose Park trail options are addressed separately from the Rock Creek Park multi-use trail in the EA. In consideration of comments received regarding Rose Park, the preferred alternative would resurface the Rose Park Trail to a maximum six-foot width, whereas the Rock Creek Park multi-use trail would be resurfaced at six to ten foot widths.

DEAR Ms.Tara Morrison  
Superintendent

I am writing to you to express my support for the position taken for more than a decade by Friends of Rose Park to keep the pedestrian path which runs through Rose Park at its current width and in its current location. NPS has previously promised our community that the path would be rehabilitated but remain in its current location and at its current width.

Any widening of the path will result in danger to the hundreds of small children and toddlers who travel between all of the play areas in the park on a weekly basis, and to the elderly who walk along the path at any given time. In addition, if a larger area of bare ground is covered by a non-permeable, asphalt, surface, the less water is available for planting and natural ground cover. The initial draft of the Environmental Assessment put out by DDOT and FHA fails to address the major safety issues to pedestrians which exist if the path is widened to 6 or 8 feet. In advance, please attend to this very important request.

I lived for 20 years one block (2709 O Street,NW) from the Park and am one of the founding members of Friends for Rose Park so this is very dear to my heart and to me the best solution to a thriving neighborhood Park.

Sincerely Yours,  
Courtney Hagner  
2853 Ontario Road, NW  
Apt. #105  
Washington, DC 20009-2237

43-01

43-02

***Response to 43-01***

The preferred alternative for the project has been determined to have a net benefit on human health and safety, based on the repair and rehabilitation of trails and other proposed improvements. Rose Park Trail Option B, described on page 34 of the EA, details the resurfacing of the Rose Park trail along its current alignment. Rehabilitation of the trail at its current width was dismissed in section 2.8.3 of the EA.

At Rose Park, the current, narrow width of the trail has caused ponding issues and has forced users from the trail, trampling the vegetation along the path. A wider trail would accommodate the multiple user types of the path in a safer manner. Trail widening and a smoother surface could further promote use of the trail. However, the increase in usage resulting from a zero- to two-foot widening is not expected to result in increased pedestrian/bicyclist conflicts. To calm traffic, yield signs or speed limit signs could be added and raise safety awareness. In further consideration of pedestrian/bicyclist safety, a synopsis of *Conflicts on Multiple-Use Trails: Synthesis of the Literature and State of the Practice* was added to Chapter 4 of the Final EA under Human Health and Safety.

***Response to 43-02***

Measures to protect vegetation throughout the entire project area including Rose Park are described on page 38 of the EA. For the Rose Park trail, the proposed zero to two-foot widening would not have appreciable effects on vegetation or ground water seepage. The existing narrow width of the Rose Park trail forces users off the trail, resulting in bare soils. The proposed rehabilitation would provide a more adequate width for users to remain on the trail thereby encouraging growth of ground cover beside the trail.