

The Committee of 100  
on the Federal City



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| March 1<sup>56</sup>, 2017

Superintendent  
Anacostia Park Management Plan  
1900 Anacostia Drive, SE  
Washington, DC 20020

Subject: Comments on Anacostia Park Management Plan Environmental Assessment

Dear Superintendent:

The Committee of 100 on the Federal City (C100) welcomes the opportunity to provide comments on the Environmental Assessment (EA) for Anacostia Park, a vital community and natural resource. The management plan describes four alternatives: three action alternatives and a no-action alternative, and analyzes the potential impacts these alternatives would have on the natural, cultural, and human environment. We agree with the National Park Service that Alternative 3 should be the preferred alternative, and offer suggestions to enhance its positive aspects.

Introduction

Anacostia Park encompasses approximately 1,108 acres of parkland along the banks of the Anacostia River. The park is composed of natural areas, managed waterfront areas, and public recreation facilities. The management zones are: natural resources, the Langston Golf Course, organized sport and recreation, community activities and special events, park administration and operations, and special uses (including the RFK Stadium site). The Anacostia Park's mission statement appears at page 6 of the EA : "Anacostia Park, which includes the Kenilworth Park and Aquatic Gardens, preserves forests and contributes to the protection of the water quality of the Anacostia River, protects historic, scenic, and natural resources and values, and provides high quality waterfront recreation opportunities for the local community and the visiting public." We believe that the National Park Service's (NPS's) preferred alternative furthers these goals.

Alternative 3: NPS's preferred alternative

NPS selected Alternative 3 as the preferred alternative, concluding that it would best accomplish the purposes of the management plan and meet the park's current and future needs, and because it offers the most balanced combination of recreation areas and natural areas, providing the most flexibility and diversity in visitor activity and recreation opportunities in the park (Figure 1). We agree that Alternative 3 strikes the best balance between preserving natural areas and the need for recreation and river access.

Alternative 3 ... would balance the rehabilitation of natural areas with sports and recreation facilities in the park to transform it into one of Washington, DC's major recreational parks and a prime natural exploration area with enhanced river access and a gateway to the Anacostia River. ... The existing water and land trail systems along the east and west shores of the Anacostia River would be retained and enhanced. ... Facilities supporting sports play would be consolidated, with the current organized sports capacity retained or slightly expanded. The park would maintain facilities for neighborhood and regional recreation. No new major cultural facilities would be added, though programming for heritage tourism, natural area exploration, and park interpretation would be expanded. Concession food trucks and vendors would be limited to designated developed areas. Public access to the river for boating would be enhanced throughout the park by providing boat launches, boat tie-ups, and sites potentially supporting concessioner-provided boat rental open to the public. More convenient park access and connectivity with city neighborhoods would be developed through enhanced and expanded land and water trails, bicycle infrastructure, gateways and portals, public transit, and waterborne transportation. Environmental rehabilitation would continue along the waterfront, stream corridors, wetlands, and forests, as well as areas within recreational zones. Remediation of contaminants affecting park resources would enhance, where possible, the riparian corridor including its ecological functionality, scenery, habitat, wetlands, resiliency, and aesthetics. Within the natural resource recreation zone, natural areas would be created through wide bands of plantings along riparian corridors and between more developed recreational zones, creating a network of naturalized areas interwoven with more developed use-intensive areas. Management Plan, p. 23.

Alternative 3 calls for a natural buffer along the river edge of Langston Golf Course with habitat for birds, butterflies, and native pollinators. Management Plan, p. 152.

Our recommendations for Alternative 3 are:

1. The Management Plan should control development of the RFK Stadium site (special permit zone).

EventsDC has issued plans for the RFK Stadium site on land leased from NPS to the DC government. Some aspects of its plan appear consistent with the goals of the Management Plan, but others may conflict. In the near-term (over a 2-5-year period), EventsDC plans 217,000 square feet (4.98 acres) of new multi-purpose recreational fields at the RFK Stadium site, a step in meeting recreation needs.<sup>1</sup> EventsDC also plans three new pedestrian bridges linking the stadium site, Kingman Island, Heritage Island, and River Terrace.<sup>2</sup> Finally, EventsDC plans a sports and recreation complex, underground parking and market hall. Over the longer term, EventsDC plans to construct a 20,000 seat arena for professional basketball and ice hockey, a building for cultural uses, demolish RFK and build a new NFL stadium (if the NFL will pay for the new stadium). NPS needs to evaluate whether these plans are consistent with the lease and promote the Management Plan's goals.

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<sup>1</sup> [eventsdc.com/rfkcampusfuture.com](http://eventsdc.com/rfkcampusfuture.com).

<sup>2</sup> The DC government owns all of Heritage Island, and the area of Kingman Island south of the Benning Bridge.

## 2. Only absolutely essential roads should be built in natural resources areas.

The area between the RFK Stadium site and the river is a natural resources area controlled by NPS.

Much of this buffer has been set aside and reforested with native trees and shrubs. The buffer is intended to filter storm water prior to its discharge into the river and to maintain a visually pleasing park edge along the shore. Management Plan, p. 152.

We urge NPS to strictly limit road building in Anacostia Park. The Anacostia Riverwalk Trail, including the section on the west bank of the river, offers important benefits:

Key elements of the project include shared-use paths and educational signage, enhanced trail viewsheds to bring users closer to the water's edge, and minimized impacts of paving or other trail infrastructure on the natural environment. Management Plan, p. 42.

Although Alternative 3 would allow new visitor access points, including roads, trails, and park entrances, we urge that the Management Plan limit any road building to these uses. In contrast, DDOT and EventsDC are planning a new road through Anacostia Park along the west bank of the river through natural resource areas adjacent to RFK Stadium and Congressional Cemetery. Figures 2A and 2B. DDOT's "Park Drive" would be a commuter road from Benning Bridge to Barney Circle. Roads threaten wildlife.<sup>3</sup> Additionally, the Anacostia Riverwalk Trail offers many health and education benefits. This road would have a direct and negative impact on the natural resources areas, the Anacostia Riverwalk Trail, and block access to the river. The CSX tracks already intrude into this area, and a new road would further threaten wildlife, pedestrians, and cyclists, the intended beneficiaries of the Management Plan. In addition, almost all this area is within the 100-year floodplain. Management Plan (Figure 15). This road is not essential and should not be built; developers do not need it to access Reservation 13 (HillEast Waterfront/DC General site). Residents of eastern Capitol Hill have repeatedly objected to the "Park Drive" in public meetings.

## 3. The Management Plan must mitigate the adverse effects from CSX operations in Anacostia Park.

Detailed maps are essential for successful planning. To achieve the goals of the Management Plan, the map of the park should show the CSX rail lines running through the park on the east and west banks of the river (see Figure 3). On the east side of the river, the tracks divide Anacostia Park, go under Route 295, and branch into seven tracks that comprise the Benning

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<sup>3</sup> DOEE, "Wildlife Action Plan," 2015, p. 95. Table 16 IUCN Hierarchy of Conservation Threats and TRACS Action Drivers in the District.

Railyard. The rail tracks on both sides of the river and the CSX Anacostia Bridge are even now subject to flooding and will be at further risk as early as 2020.<sup>4</sup>

CSX plans to increase the number of trains; many will be double-stacked. In addition, CSX uses a rail bridge, the Benning Bridge (not shown in Figure 3). Please see photograph of CSX train traversing the CSX Anacostia Bridge (Figure 4.) This bridge, with its low clearance, is already subject to flooding, and blocks navigation above the bridge (except for very small boats, such as canoes).<sup>5</sup> It will need to be replaced, and the Management Plan should specify the location and height specifications for a new bridge in order to improve resilience and provide the opportunity for all boaters to use the river north of the current CSX Anacostia Bridge.

4. The Management Plan needs to include climate change information for the entire Waterfront area.

It appears that this proposed Management Plan, as is the case with many government reports, was some time in development and thus it does not contain references to the recent reports on climate change from DOEE.<sup>6</sup> The map in Figure 1 offers a lot of information, perhaps too much, confusing trail routes with future flood plains. The limits of the 100- and 500-year flood plains are unclear because graphics similar to what is used for Trails are used to depict the flood plains. A clear graphic depiction of flood plains does not appear until Figure 15 (page 105 of the EA).<sup>7</sup>

The Plan covers a period of 15-20 years, and is apparently the reason that the RFK complex (leased to DC for another 22 years) is not addressed in terms of alternate management plans, however, the flood plains maps do show the impact on the RFK complex. But the flood plain maps do not show the impact on Kingman and Heritage Islands, Hill East or Boathouse Row. We recognize that these parcels are no longer owned by the NPS, but they need to be included, just as the RFK complex is included.

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<sup>4</sup> *Vulnerability & Risk Assessment: Climate Change Adaptation Plan for the District of Columbia* (DOEE, 2016) chart, page 31 and text pages 35-36:

Railroad segments are also already experiencing repetitive flooding in key locations, such as ... the CSX line in the Kenilworth area. This flooding is likely to be exacerbated by increased precipitation, sea level rise and storm surge. Consequently, many assets are identified at risk as early as 2020.

<sup>5</sup> DOEE, "Vulnerability and Risk Assessment: Climate Change Adaptation Plan for the District of Columbia," 2016, 36, noting that CSX tracks in Kenilworth area are already subject to flooding.

<sup>6</sup> DOEE has issued two recent reports concerning climate change and flood plains that are not referenced in the Plan:  
1. *Vulnerability & Risk Assessment: Climate Change Adaptation Plan for the District of Columbia* (DOEE, February, 2016)

2. *Climate Ready DC: The District of Columbia's Plan to Adapt to Changing Climate* (DOEE, November 2016)

<sup>7</sup> It is not clear whether the flood plain maps take into account sea level rise. The Federal Emergency Management Agency (FEMA) is currently updating its Flood Insurance Rate Maps (FIRMs). The current version of FIRMs, some of which were produced more than 30 years ago, do not project the effects of sea level rise due to climate change. [https://www.floodsmart.gov/floodsmart/pages/coastal\\_flooding/coastal\\_flood\\_maps.jsp](https://www.floodsmart.gov/floodsmart/pages/coastal_flooding/coastal_flood_maps.jsp)

5. Land transfer, environmental cleanup, and redevelopment: will DC government or NPS pay the necessary costs?

There are two significant portions of the waterfront that the Congress had directed NPS to transfer to the District of Columbia, subject to certain conditions: Poplar Point (approximately 110 acres) and Kenilworth Park (approximately 130 acres).

The proposed redevelopment of the Poplar Point parcel is described at page 43-44 of the EA. Contamination exists at the Poplar Point site and the District of Columbia has agreed to conduct a remedial investigation/feasibility plan, under the oversight of the NPS (EA, pages 49-50). The EA does not explain whether the District of Columbia or the NPS will bear the costs of any cleanup. Kenilworth Park also requires remediation of contamination (soil, sediment, groundwater and surface water) described at pages 45-47 of the EA. The NPS has investigated the extent and type of contamination and plans to issue a proposed plan for remedial action. The EA does not explain whether the NPS or the District of Columbia will bear the costs of the remediation,

6. Lighting should comply with the International Dark-Sky Association's standards.

The Management Plan (pp. 15, 17-19) calls for lighting in several zones to be "dark sky compliant." To insure that the lighting satisfies the most rigorous dark sky standards, we suggest that the Management Plan specify that all lighting fixtures must meet the standards for a seal of approval from the International Dark-Sky Association (IDA). Fixtures approved by IDA employ warm-toned (3000 K or lower) white light sources or employ amber light sources or filtered LED light sources, are full-shielded, emit no light above the horizontal plane, have no sag or drop lenses, side light panels, or uplight panels, etc.<sup>8</sup>

C100 appreciates the opportunity to submit these comments. For any questions concerning these comments, please contact Beth Purcell at [info@committeeof100.net](mailto:info@committeeof100.net) or 202 681-0225.

Sincerely,



Stephen A. Hansen, Chair

cc:  
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<sup>8</sup> <http://darksky.org/fsa/apply-fsa>.

Figure 1. Anacostia Management Plan Alternative 3 (preferred alternative)

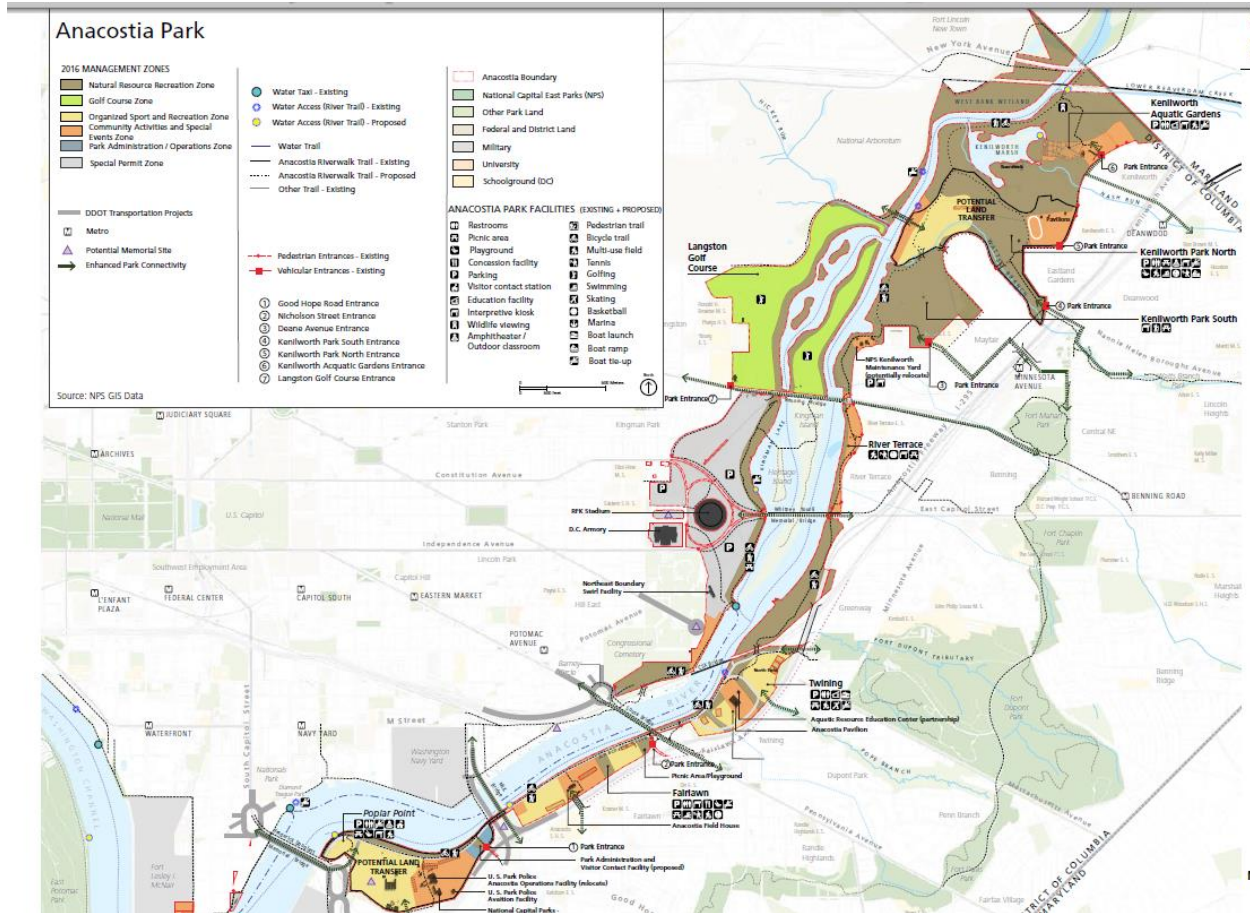


Figure 2A. DC Department of Transportation's proposed Park Drive, DDOT, "Middle Anacostia Crossings Study," p. 7-1 (2005).

## Chapter 7: LONG-TERM IMPROVEMENTS (2005 – 2025)

The long-term improvements address the missing movements at the key interchanges and provide relief to congestion within the study area and possibly beyond. The next phase of environmental analysis and engineering design of the long-term improvement options could commence at any time. However, the complexity of these options could result in construction starting around 2010 or possibly later. Long-term improvements are focused on the following interchanges and major roadways within the Middle Anacostia River region:

- Pennsylvania Avenue/Anacostia Freeway Interchange,
- Barney Circle improvements,
- 11th Street Bridges/Anacostia Freeway Interchange,
- 11th Street/Southeast Freeway Interchange,
- Boulevard along Southeast Freeway, and
- Park Drive Connector Road.

Among the six locations identified for long-term improvements, there are a total of twenty options discussed in this chapter. A synopsis of how each are defined is as follows:

- The Pennsylvania Avenue/Anacostia Freeway Interchange contains six options using the "P" designation.
- Barney Circle improvements include two long-term options and are identified using the "BC" designation.
- The 11th Street/Anacostia Freeway Interchange contains four options and is identified with the "A" designation.
- The 11th Street/Southeast Freeway Interchange contains three options identified using the "SE" designation.
- Four boulevard options along the Southeast Freeway are presented using the "Boulevard" designation. Three typical sections have been developed to illustrate opportunities for the boulevard concepts. The feasibility of which typical sections may be developed is dependent on the option.
- Finally, there is one option for the Park Drive alignment and it is identified using the "R" designation.

Figure 38 provides an index of the locations for the various long-term improvement options. Appendix M contains the geometric data associated with each long-term option.

Figure 38. Location of Long-Term Improvement Options





Figure 2B. DC Department of Transportation's proposed Park Drive, DDOT, "Middle Anacostia Crossings Study," p. 7-47 (2005).

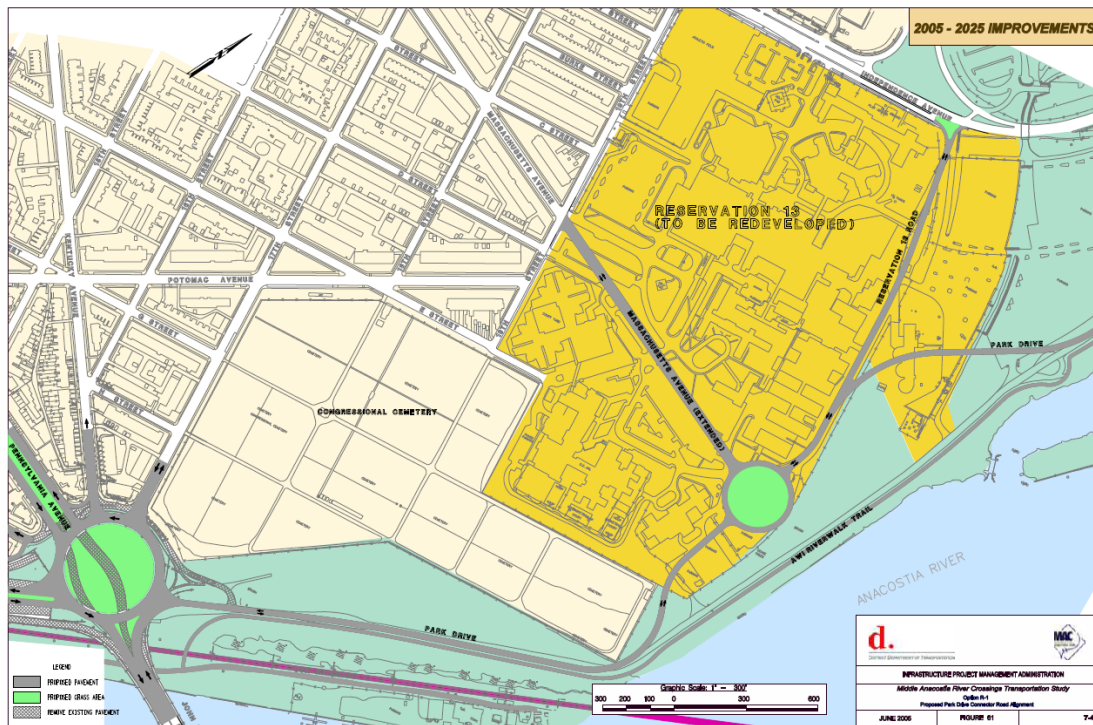




Figure 3. Active CSX rail lines in the District of Columbia. Source: CSX EIS application, Virginia Avenue Tunnel.

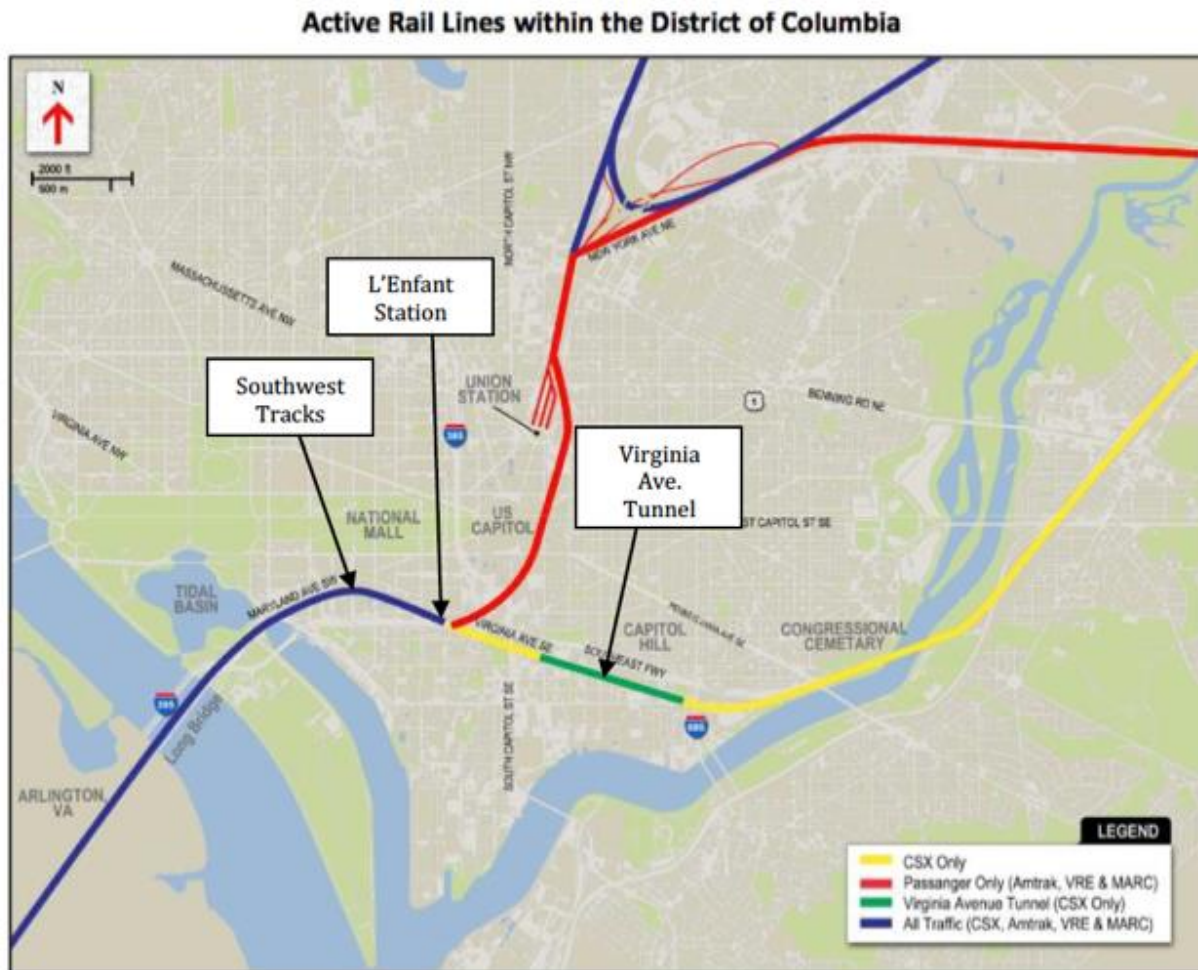


Figure 4. CSX train crossing the Anacostia on Anacostia Bridge. Photo by John Cochran, Posted September 6, 2013 in GGW

