

The Committee of 100

on the Federal City



November 29, 2023

National Capital Parks-East

https://parkplanning.nps.gov/Reimagine_AnacostiaPark_PrelimDesign

Attn: ANAC DCP/ Superintendent

1900 Anacostia Drive, SE

Washington, DC 20020

Comments on Reimagining Anacostia Park/Preliminary Concept Design:
Sections D and E

Dear Superintendent:

The Committee of 100 on the Federal City (C100) commends the National Park Service (NPS) for incorporating feedback from the community in Wards 7 and 8, and for the excellent and thoughtful ideas in the Preliminary Concept Plan for Sections D and E. NPS balances 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. Figure 1. C100 welcomes the opportunity to provide comments on the Preliminary Concept Plan. Our comments track the topics in *Reimagine Anacostia Park! A Concept Plan for Sections D & E, Public Informational Meeting* (September 27, 2023),

WATERFRONT ACTIVATION: Fishing piers. (public information meeting, p. 26). Fishing piers provide year-round recreation for all ages. Adding fishing piers in Anacostia Park will mitigate the loss of the two fishing piers at the 11th Street Bridge Park. Anglers can catch invasive blue catfish, common carp, largemouth bass, assorted sunfish, and invasive northern snakeheads. We note that DOEE, the District agency charged with protecting and restoring the environment, encourages catch and release.¹

WATERFRONT ACTIVATION: Natural shoreline. (public information meeting, p. 27-29). C100 supports maximizing the natural shoreline and minimizing the seawall (Potential options 2 and 3). While the seawalls are “historic,” they were built as a response to a perceived need in the early twentieth century to dredge the Anacostia River for improved navigation, to eliminate mosquito habitat, and for Combined Sewer Outflows. Photographs in the NPS 2020 report show that the seawall, including CSOs, is

¹ Fishing in the District: <https://doee.dc.gov/fr/service/fishdc> .

deteriorating in many places.² One option would be to remove seawalls in certain locations or allow the seawalls to continue deteriorate, disappear, to be replaced by living shorelines.³

DOEE encourages creating living shorelines: At the founding of the city, the Anacostia River was bounded by broad floodplains and large marshes.⁴ Throughout the District's development, seawalls have been constructed along the shorelines of the Anacostia and Potomac Rivers. Prior to the construction of seawalls, the Anacostia River meandered through a broad floodplain that contained large marshes. Figure 2. **Seawalls severely restrict habitat for aquatic and terrestrial species, remove the ability of the river to connect with its floodplain, and do little to reduce wave energy.** Seawalls also prevent the predicted landward migration of wetlands resulting from climate change (Hughes 2004), thereby reducing the District's climate change resiliency. DOEE should encourage stakeholders to consider the establishment of living shorelines, where appropriate, as options for best management practices for future development projects and restoration projects along the river. **Living shorelines are a bank-stabilization technique that utilizes materials similar to natural shorelines and may include wetland plants, submerged aquatic vegetation, and a variety of structural material such as fiber logs, sand, rock and stone. Living shorelines provide shoreline stabilization, create habitat for aquatic and terrestrial wildlife, and improve water quality by filtering stormwater runoff.** Living shorelines may be a preferred approach for adapting to sea level rise where there is space for landward migration of wetlands. Some living shoreline designs involve incorporating wetland plants and creating wetlands, which would help increase the number of District wetlands. Coordination between DOEE, US Army Corps of Engineers, NPS, and other stakeholders, as well as public outreach and public acceptance, will be necessary to encourage living shorelines within the along the Anacostia and elsewhere in the District. DOEE, *Wetland Conservation Plan* (2020), p. 241. [emphasis added]

² DCWASA is completing large tunnels to channel the large volume of storm, water that occurs during rain storms, that combines with raw sewage to Blue Plains for treatment, which will decrease untreated sewer and run-off into the Anacostia by 98%. Under the consent decree requiring elimination of CSOs, all tunnels must be completed by 2025. [Northeast Boundary Tunnel Project | DCWater.com](#).. As a result, combined sewage outflow structures emptying untreated sewage and storm water into the Anacostia should no longer be needed.

³ *ANACOSTIA SEAWALL, SEGMENTS 1 - 3 National Capital Parks-East Approximately 2.16 miles along the Anacostia River between Frederick Douglass Memorial Bridge and CSX Railroad Bridge Washington District of Columbia* . HAER DC 78-A. (2020). [Northeast Boundary Tunnel Project | DCWater.com](#)

⁴ Garnett P. Williams, *Washington, D.C.'s Vanishing Springs and Waterways*. U.S. Geological Survey, reprinted in *Geology Hydrology and History of the Washington, D.C. Area* (Alexandria, Va.: American Geological Institute, 1989).

WATERFRONT ACTIVATION: Enhance and enlarge wetlands.⁵ (public meeting p. 29). DOEE is working with NPS to preserve existing wetlands (approximately 300 acres), and create new wetlands.⁶ As noted, wetlands provide the opportunity for recreation and habitat for wildlife. C100 supports the proposal to enhance existing wetlands and introduce new, nature-based stormwater facilities to help with flooding.⁷

WATERFRONT ACTIVATION: Daylighting Pope Branch within Anacostia Park (Public meeting p. 31).⁸ Pope Branch is a first-order tributary of the Anacostia River. The entire stream lies within DC, running from the Twining and Penn Branch neighborhoods to Anacostia Park.⁹ In 2016 DOEE completed stream restoration of Pope Branch *outside* the borders of Anacostia Park. Daylighting this remaining section will restore all of Pope Branch to its original condition.

Loss of surface streams. Of the streams that flowed through the District of Columbia at the start of the 19th century, only about 30% remain today. The other 70% have been filled in, diverted into pipes, or have disappeared as a natural response to widespread construction reducing infiltration of rainfall.

Benefits of daylighting streams: Streams, including ephemeral streams that do not have water year round, mitigate damage from floods, and provide habitat and food for aquatic species, semi-aquatic species, waterfowl, and other wildlife. Headwater streams are a source of water, nitrogen, organic carbon, and sediment to downstream waters. Despite their small individual size and distance from downstream waters, headwater streams, including ephemeral streams,

⁵ A wetland is “an area that is inundated by tides or saturated by surface water at a frequency and duration sufficient to support, and that under normal circumstances, does support, a prevalence of vegetation typically adapted for life in saturated soil condition; and included a marsh, swamp, pond, or vernal pool.” 21 DCMR 2599. DOEE, *Wetland Conservation Plan* (2020), p. 4.

⁶ *District of Columbia Wetland Program Plan 2021-2025*.

⁷ 21 DCMR 2599. DOEE, *Wetland Conservation Plan* (2020), p. 4.

⁸ “**Daylighting**” streams: restoring to the surface streams which had been buried underground.“ [District Begins Restoration of Piped Stream | ddoe \(dc.gov\) Project Description_Broad Branch Restoration_0.pdf \(dc.gov\)](#)

³ **Wetland** - “an area that is inundated by tides or saturated by surface water at a frequency and duration sufficient to support, and that under normal circumstances, does support, a prevalence of vegetation typically adapted for life in saturated soil condition; and included a marsh, swamp, pond, or vernal pool.” 21 DCMR 2599. DOEE, *Wetland Conservation Plan* (2020), p. 4.

⁹ **Stream** – a channel or conveyance of surface water with perennial, intermittent, or ephemeral flow and having defined bed and banks, whether natural or artificial.” 21 DCMR 2699.1.

cumulatively supply most of the water in rivers. Downstream waters are the time-integrated result of all waters contributing to them.¹⁰

DOEE's stream restoration at Pope Branch

The primary land uses of the 250-acre Pope Branch watershed are parkland and residential lands yet the impervious area in the residential neighborhoods surrounding the stream caused high rates of bank erosion and channel incisement erosion which caused a sanitary sewer line in the upper reaches of the stream valley to become exposed and compromised. DOEE partnered with the Department of Parks and Recreation (DPR) and DC Water and Sewer Authority (DCWATER) to do a joint sewer line and stream restoration project with DCWATER as the lead contracting agency.

DCWATER first fixed the sewer line along the stream followed by the stream restoration work. In total, over 4,400 feet of stream were restored using regenerative stream design which filled in the incised stream and raised the stream bed about 3-4 feet so that it reconnected with its historic floodplain. A series of pools and riffles/cascades were installed to ensure both the lateral and vertical stability of the stream so it can remain stable even in high flow events. 663 native trees, 170 native shrubs, over 13lbs. of native grass seed, and over 100 native aquatic plants were planted as part of the restoration project.¹¹

ACCESS & CONNECTIVITY. Lighting improvement (Public meeting p. 34, 35). Light pollution should be minimized.¹² All lighting should comply with the International Dark-Sky Association's standards. To insure that the lighting satisfies the most rigorous dark sky standards, we suggest that the NPS 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.

ACCESS & CONNECTIVITY. Anacostia Drive. (public meeting p. 37). C100 supports moving Anacostia Drive away from the river as far as possible, to create more space for natural shorelines and river access.

¹⁰ “ [Uncovering the History of the District's Buried Streams | Open Data DC](#)

¹¹ [Pope Branch Stream Restoration Project | doee \(dc.gov\)](#)

¹² DOEE, *Wildlife Action Plan*, 6.4.5 (2015).

C100 appreciates the opportunity to submit these comments. For any questions concerning these comments, please contact me at Chair@committeeof100.net or 202-494-0948.

Shelly Repp, Chair
Committee of 100 on the Federal City

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Figure 1. NPS map of Sections D & E. *Reimagine Anacostia Park*. P. 12.

EXISTING PROGRAM

ACTIVE RECREATION

- (6) - Multi-Purpose Fields (Permitted)
- (2) - Baseball / Softball Backstops
- (2) - Football / Rugby Goalposts
- (9) - Tennis Courts
- (4) - Full-sized Basketball Courts
- (2) - Half-sized Basketball Courts

COMMUNITY FELLOWSHIP

- (1) - Picnic Pavilion
- (3) - Playground Areas
- (6) - Informal Horseshoe Pits
- (1) - Skate Pavilion
- (1) - Recreation Center
- (1) - Shuffleboard Court Area (not-in-use)
- (2) - Restroom Facilities
- (1) - Outdoor Education Center

WATERFRONT ACTIVATION

- (1) - Boat Ramp



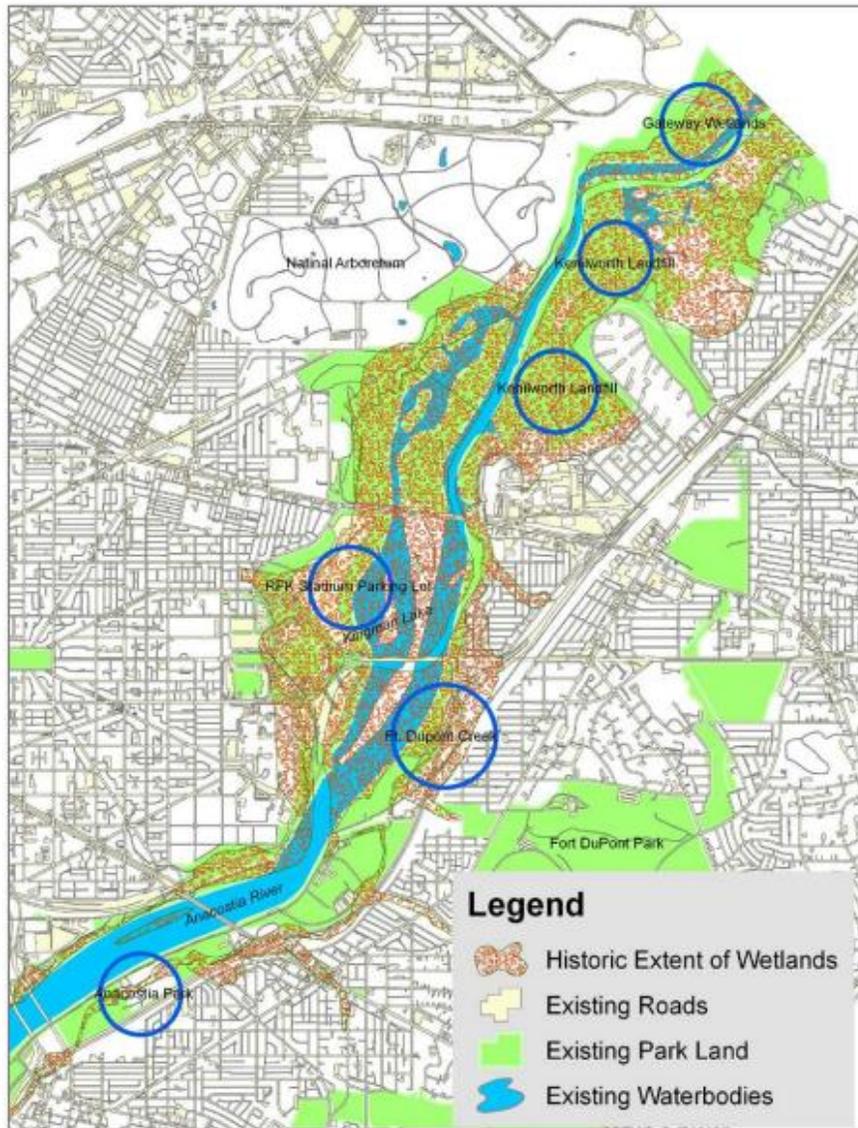


Figure 27 An approximation of the original extent of the wetlands of the upper Anacostia River in the District based on historic maps. Blue circles indicate six potential tidal wetland restoration sites in locations that may contain natural historic wetland soils.

Figure 2. DOEE, Wildlife Action Plan (2015).