

June 21, 2016

COMMITTEE OF 100 ON THE FEDERAL CITY

MAJOR ISSUES IN THE PARKS AND OPEN SPACE ELEMENT OF THE COMPREHENSIVE PLAN

INTRODUCTION

As requested by the staff of the National Capital Planning Commission (NCPC), the Committee of 100 on the Federal City (C100) is highlighting major issues for consideration in the Parks and Open Space Element that the NCPC staff is preparing. This document supplements the discussion paper that C100 submitted before the meeting with NCPC staff on March 8, 2016. We would like to know the schedule for this element as you now see it, and ideally, learn this fairly soon. After additional study is completed, we would welcome the opportunity to meet regarding this Element.

MAJOR ISSUES FOR THE PARKS AND OPEN SPACE ELEMENT\

The Committee of 100 is concerned with the overall Parks and Open Space Element. However, certain issues are particularly important, and particularly the Anacostia Park/RFK issue.

Anacostia Park/RFK Site: The RFK Stadium site covers 180 acres of environmentally-sensitive land on the Anacostia River that is within the floodplain that extends to Oklahoma Avenue. The National Park Service (NPS) lease to the DC government, which expires in 2036, allows recreational and related uses. The RFK stadium site is a part of the Anacostia River Parks, consisting of over 1,800 acres on both sides of the Anacostia River.

Both the Parks and Open Space Element of the federal elements of the current (2004) Comprehensive Plan and DC Office of Planning's Anacostia Waterfront Framework Plan (2003) created a vision for transforming the Anacostia waterfront into an ecological precinct, with environmental stewardship as the theme, consisting of a network of green parks, and varied river-related activities, connecting nearby neighborhoods to the river. The current Parks and Open Space Element contains multiple goals on improving the Anacostia River's shoreline and water quality and discouraging large paved parking areas. In 2010, *CapitalSpace: A Park System for the Nation's Capital* recommended expanding active recreation space in the city. As a first step in implementing the Anacostia Waterfront Framework Plan, the Department of the Interior has transferred the southern part of Kingman Island and all of Heritage Island to the City to be used as "wildlife refuges". Walking trails have been constructed and a Nature Center is to be built on Kingman Island.¹

¹ Further protecting and restoring the natural settings of Heritage Island and Kingman Island is DC's decision to rezone the islands as W-0, that is designed to encourage park,

Planning for Anacostia Park presents process and policy challenges. In 2015, Events DC, a facilities management arm of the DC government, began planning to redevelop the RFK site and in April 2016 released design concepts with three potential anchor tenants.² (1) a 20,000-seat arena (2) an NFL stadium, and (3) no anchor tenant. While the plans call for reducing surface parking,³ all plans call for constructing multiple new buildings. Events DC's goals conflict with the goals in the current Comprehensive Plan and The Anacostia Waterfront Framework Plan.⁴ For this reason, Events DC should not be doing

open space and waterfront-enhancing uses, with vehicular parking prohibited, except for handicap spaces.

² A new NFL football stadium would be an effort to induce the Redskins to return to DC and a new 20,000-seat arena is proposed to house professional hockey (the Capitals) and professional basketball (the Mystics and the Wizards). The plan attempts to take advantage of the fact that both the Verizon lease and the Redskins' Landover lease expire in 2027. Events DC is silent about what would become of Verizon Center.

³ The Events DC proposal is to build a 6,800-space multi-level enclosed parking garage, that would provide less total parking spaces than was provided when RFK was used as an NFL stadium. The proposed parking garage lacks enough room for stadium parking at RFK. The Redskins current FedEx Field stadium has a capacity of over 91,000 seats (2004 - 2010), compared with RFK's maximum capacity of 56,00 football seats (1961). To bring the Redskins back to DC would require a stadium similar in size to FedEx Field, that would require parking for over 60% more fans than parking at RFK ever accommodated. Also significant is the trend towards greatly expanded tailgating at football games, that requires even more parking lot space for tents, canopies, flags, deep fryers, grills, smokers, generators, and port-o-potties that has been called "The last great American neighborhood, the new community social or the good old-fashioned block party (<http://www.tailgating.com>).” How would tailgating be accommodated in a multilevel, enclosed garage? There is no space to provide NFL-level parking at or near the RFK complex, and without that parking, a football stadium cannot be a success at this site.

⁴ The plans of Events DC are also inconsistent with fiscal and temporal reality. The remaining 20-year term on the stadium lease limits redevelopment options. The 180 acres that comprise the RFK Stadium complex are leased to the District through 2036, at which time the land reverts to the federal government unless Congress takes further action. Events DC simply cannot plan redevelopment of the site that would involve uses of the site beyond 2036. No sports team owner (or the DC government) can invest the hundreds of millions of dollars necessary for a modern stadium without a much longer guaranteed lease. It would be extremely unlikely that Congress could pass legislation extending the lease to guarantee a long-term football deal at this site with intense competition from Maryland and Virginia to build a football stadium in their jurisdictions.

separate planning for the RFK site. A better-coordinated effort and new initiatives among the relevant federal agencies (NPS, NCPC, USDOT, USDA) and city agencies (Office of Planning (OP) and Department of Energy and Environment (DOEE))⁵ is needed, to develop a cooperative master plan for Anacostia Park (essentially updating the Anacostia Waterfront Framework Plan). We strongly urge that NCPC take the opportunity to move forward to advance an improved process and policy in writing the new Parks and Open Space Element. The beginning elements to prepare such a plan are in place. These include the existing Parks and Open Space Federal Element of the Comprehensive Plan from 2004 which NCPC is now updating, the existing District Parks, Recreation, and Open Space Element from 2006, which OP is now preparing to update, and at least four development plans prepared by NCPC and the Anacostia Waterfront Vision⁶, all of which address redevelopment of the stadium complex. This background work can be the starting point in planning the redevelopment of this site and

It is certainly the case that Congress would not pass legislation extending the lease over the opposition of the National Park Service.

⁵ The Committee of 100 recommends that Events DC should participate in the planning process along with District and Federal agencies but that Events DC should make no decisions on the plans for the RFK site in Anacostia Park. Events DC is a facilities management entity, primarily focused on benefiting the restaurant and hotel industries by attracting non-DC residents to events in DC. The interests of DC residents, as well as local cultural and preservation values, have historically been given little weight or have been completely ignored by Events DC (and its predecessors the Convention Authority, the Armory Board and the Sports and Entertainment Commission). Events DC has a clear statutory mandate to focus on revenue generation, rather than civic, environmental or ecological improvement. While the RFK parcel was leased to DC, primarily for the construction and operation of a football and baseball stadium, we now have the new baseball stadium and a football stadium is no longer viable at this location. What we need is a new plan for this site, consistent with the Anacostia Framework Plan, that would justify a new lease of the site, as an ecological precinct.

⁶ The plans that propose the responsible redevelopment of the RFK Stadium complex can be found on the website of the National Capital Planning Commission at ncpc.gov under “Publications” and on the website of the Anacostia Waterfront Initiative at AnacostiaWaterfront.org:

- CapitalSpace – A Park System for the Nation’s Capital (April, 2010)
- Washington’s Waterfronts - Phase 1 (1999)
- Extending the Legacy: Planning America’s Capital for the 21st Century, Chapter 3 (1997)
- The Anacostia Waterfront Framework Plan (2003)
- RFK Stadium Redevelopment Study (2006)

involve NPS, OP, and NCPC⁷ in the planning process. If we can get the right process in place, led by NCPC, with the right people/agencies involved, then we will get to the right solution/outcome.

Washington Waterfront Walk: The NCPC *Extending the Legacy Plan* (1997) called for an 11-mile waterfront walk from Georgetown to the National Arboretum, encompassing sections along the Anacostia River, the Washington Channel, and the Potomac River. The Committee of 100 has referred to this proposal as the “Washington Waterfront Walk”. Good progress has been made on sections along the Anacostia River (the Anacostia Riverwalk Trail) and some sections along the Potomac River are already in place. However, there are some gaps: (1) the section from South Capitol Street to the Southwest waterfront (a residential area) and (2) the section from 14th Street and Maine Avenue, SW across the Jefferson Memorial grounds to the Potomac River (NPS land). The C100 believes the Parks and Open Space Element should address the next steps with this project, hopefully helping to bring this entire project to completion within the next five years.

Fort Circle Parks/Civil War Defenses of Washington (CWDW): The Civil War Defenses of Washington and connecting Fort Circle Parks together comprise a major park system for the nation’s capital, one rich in history, beauty, natural resources and recreational opportunities. They have been and still are neglected compared to other NPS sites. They need and deserve more resources to fulfill the NPS mission to preserve them for the use and enjoyment of present and future generations. What is the status of the NPS Fort Circle Parks system in DC, MD and VA, both in terms of the restoration, maintenance, management, and interpretation of the historic Civil War Defenses, and also the status and improvement of the related park lands, including better connections, visitor facilities, and possible additional park land acquisition, and improved trails connecting the entire Fort Circle Parks for hiking and biking? The non-NPS CWDW parks in Maryland and Virginia are in better condition and could serve as models. We are interested in how the revised Parks and Open Space Element address these concerns.

Planning for Flooding in Parks and Open Spaces: There are two problems with flooding in DC: (1) Flooding from the edge - rising sea levels, and (2) internal (storm water control) – resulting from expansion of impervious surfaces. The NCPC *Report on Flooding and Stormwater in Washington, DC* (2008) noted predictions that the water level in the Potomac River will increase by one foot in 100 years. Although the National Mall is now better protected against flooding,⁸ other parks and open spaces, particularly near the Potomac and Anacostia Rivers, are potentially vulnerable to flooding today,

⁷ USDA also needs to be involved, if the plan encompasses the National Arboretum. USDOT should also be involved because some of the new/replacement bridges will involve funding for park amenities.

⁸ Please see also the NCPC staff report *Washington, DC Flooding Protection* (2011).

according to FEMA maps, and with rising sea levels, may be more vulnerable to flooding in future decades. The Parks and Open Space Element should recommend measures to prevent, mitigate, or accommodate flooding.

National Mall and Adjacent Areas of the Monumental Core: The C100 is very interested in continuing the protection and enhancement of the National Mall and the linkages to special areas of the surrounding Monumental Core. NCPC has given special attention to these areas in the Monumental Core Plan, the Southwest Ecodistrict Plan and other work. Can additional emphasis be placed on this area in the revised Parks and Open Space Element?

Pennsylvania Avenue Initiative Area, including Pershing Park: The C100 is especially interested in the area being addressed in the current Pennsylvania Avenue Initiative. The landscape quality (parks and streetscape) is a special part of the Pennsylvania Avenue experience. Within this area, the C100 is concerned with current work on the design of the National World War I Memorial proposed for Pershing Park and the issue of how to preserve original elements of the park while creating an appropriate memorial and a lively urban park in an important and busy location.

Pedestrian and Visual Linkage from the Kennedy Center to the National Mall: In the Monumental Core Plan and in working with the Kennedy Center, NCPC has indicated an interest in providing some kind of physical link from the Kennedy Center to the National Mall. We suggest that this issue be further addressed in the Parks and Open Space Element.

Coordination with District Parks Element: What is the coordination and relationship with the District's "Parks, Recreation and Open Space Element" which will be part of the update/revision process of the District Elements for the Comprehensive Plan?

Civic Education on Parks and Open Space: We encourage NCPC to pursue a broad civic education program on the importance of parks and open space to the city. This could be done in coordination with the District Comprehensive Plan efforts, and with other organizations interested in parks and open space.

The C100 will continue to be involved as the work moves forward in key issues such as Anacostia Park, and share additional thoughts as the work progresses.