

The Committee of 100 on the Federal City



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May 7, 2018

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Marcel C. Acosta, AICP
Executive Director

National Capital Planning Commission
401 9th Street, N.W., North Lobby, Suite 500
Washington, D.C. 20004

Subject: Comprehensive Plan for the National Capital: Federal Elements -
Parks & Open Space Element

Dear Mr. Acosta:

The Committee of 100 on the Federal City (C100), founded in 1923, is the District of Columbia's oldest citizen planning organization. C100 has long been concerned with protecting and enhancing, in our time, the various elements of the L'Enfant Plan (1791-92) and the planning and design work of the McMillan Commission (1901-02) and now carrying forward in the 21st Century appropriate plans and projects to continue to enhance Washington, D.C., our national capital city, the home of Washington residents, and the center of the National Capital Region.

The Comprehensive Plan for the National Capital, composed of Federal Elements and District Elements, is the basic guide in shaping the future development of Washington, D.C. C100 appreciates the work that the National Capital Planning Commission, both staff and Commission members, have invested in preparing this Element. On March 1, 2018, the National Capital Planning Commission (NCPC or Commission) authorized the Parks & Open Space Element of the Comprehensive Plan for the National Capital: Federal Elements to be released for a 60-day public comment period. We understand that after the review period is completed, NCPC staff will make any revisions they believe are needed and bring a revised final draft back to the Commission.

We like the new organizational structure, the key principles, the discussion of designed landscapes, and the categorizations of different types of parks and open space with associated policies. We also applaud the emphasis on

protection of the L'Enfant Plan, McMillan Plan, and viewsheds. The discussion is intelligent and thorough and the policies will be helpful as criteria in helping the Commission make recommendations and decisions on proposed projects.

We have two major and somewhat related concerns:

1. We are dismayed by the lack of specifics, i.e., any plans or objectives relating to specific park and open space needs or issues. The current (2004) version of the Element by contrast identifies specific areas for more acquisition, trails to be completed, etc. It is more aspirational and concrete. In fact, not everything in the 2004 Element has been completed and those that are still relevant should be brought forward. We assume that there are a number of specific projects contained in the various plans cited that could appropriately be identified in this Element.

In addition, where there are current known issues in play like the proposal to develop the C&O Canal in Georgetown in ways that would seriously damage its historic resources and character and like the road along the west bank of the Anacostia River proposed by DDOT and Events DC. See Figure 1. The Element should address these specific areas and desired outcomes in the context of the policies.

Several plans have called for a continuous pathway along the rivers from Georgetown to the National Arboretum. There are currently gaps in that pathway. The Element should make a statement about completing the pathway and filling the gaps in what we call “the Washington Waterfront Walk,” as discussed below.

2. The revised “goal statement” (p. 3) to “protect and enhance the parks and open space system” does not include an important concept in the 2004 Element i.e., “ensure that adequate resources are available for future generations.” And the guiding principles have a “static” quality—protection and utilization of existing parks and open space but missing the goal to “enhance” what we have through the designation, acquisition, and protection of more parks and open space. While the total amounts of parks and open space may look impressive in the aggregate, the city's population will grow and today there are still unmet needs, particularly for mid-size parks, as noted in the CapitalSpace report (2010):

Overall, while parks are distributed uniformly across the city, some sections of the city have limited walkable access to a large park site, particularly in the upper north-central, Mid-City, and Capitol Hill. ...

The most common type of park in Washington is less than one acre in size. ... more than 70 percent fall into this category. Mid-sized parks, between 5 and 50 acres, account for only 16 percent of the city's total parkland. They include parks like Meridian Hill, Fort Reno, Lincoln, Langdon, and Banneker. Eighty percent of the city's parkland is found in large parks that are greater than 50 acres in size (green dots) such as Rock Creek Park, Anacostia Park, East Potomac Park, the National Mall, and many of the Fort Circle Parks. (pp. 26, 28)

There is already an appalling lack of parks and open space in rapidly developing areas like NoMA. Ward 6 has less waterfront parkland than any other Ward that borders a river. (See Figure 2.) And now we are going to redevelop Franklin Square to include a

playground because of the city's lack of initiative and foresight in setting aside or acquiring additional land for parks and open space as we expand residential development in downtown areas of DC.

Another desirable policy that would that would “protect and enhance” relates to preserving and protecting our remaining open waterfronts. One of the amendments that the C100 proposed in the current amendment cycle for the DC elements of the Comprehensive Plan was a limitation on new development or redevelopment within a minimum of 600 feet of the Anacostia River and Potomac River shorelines. This limitation should also be included in the Federal Element. Our proposal is based on the need to preserve currently open shoreline for public access and view (once it is developed, it is generally lost forever), as well as the recent floodplain studies by the DC Department of Energy and Environment and the prospect of sea level rise in the face of climate change. This should be a key part of any effort to make Washington, DC a more resilient city. Shorelines are an important asset to our nation's capital and have significant environmental benefits.

We strongly object to any reference in the narrative suggesting that the Wharf on the Southwest waterfront is a waterfront park (see page 19). The Wharf is a major waterfront mixed-use development that incorporates some plazas, walkways, docks, a park, and other open spaces, but it should not be classified as a waterfront park. And while there is a Georgetown Waterfront Park, neither would we want to see it suggested that the adjacent Washington Harbour development is a waterfront park.

In addition to these larger issues, we have a number of more specific comments and questions:

Parks and Open Space Categories: Natural Parks (p. 5)

Under the definition of “natural park”, we recommend deleting “regional development” which seems counter to protecting a natural area. In fact, on page 6 under “Provide Stewardship of Natural and Cultural Resources,” “regional development” is described as a “challenge” faced by parks and open space. In the same section on page 6, it says that “the federal government has an important role in managing and **protecting** the natural and cultural features of the region for future generations.” [emphasis added]

The term “Conservation areas” is introduced as one of the elements of Natural Parks. Conservation in the context of planning for the future of parks and open spaces is the practice of caring for the Earth's natural resources so all living things can benefit from them now and in the future. Conservation is the underlying requirement for parks and open space planning, but it does not appear later in the document. “Conserve” in the 2004 Element has been replaced by “protect” in the current draft, but both have an important role. At a minimum the concept of conservation should be included in the “Guiding Principles” (p. 7).

Section A. Protect the Parks and Open Space Design Legacy

POS.A.3 (page 13) should make clear that both axes of the National Mall should be protected and maintained, not just the “cross-axis” which we take to mean the north-south piece. The 2004 Element does refer to both axes. Also, as a general comment, the

National Mall seems to get rather short shrift in the element, and we recommend some additional attention be paid to the National Mall and Monumental Core in the narrative. POS.A.4 should be amended to include “historic” as one of the values of historic parks. Even though they are referred to as historic parks, their historic value should be specifically noted along with their possible architectural and landscape values.

Civil War Defenses

The first sentence of the second full paragraph on page 14 describes these as “open spaces along the rim of the L’Enfant City.” This is a misleading description. The Civil War Defenses of Washington is a network of green open spaces where the forts were located (some portions of the forts still remain in some cases). The forts are connected in part by a band of parks and trails. On the north side of the city, the forts were located approximately 2-4 miles north of the northern edge of the L’Enfant Plan city boundaries. Constructed during the Civil War to protect the nation’s capital, the forts stretch over a distance of 37 miles in Washington and Virginia (Arlington County and Alexandria) in a great “circle” around the original City of Washington. Therefore, many of them are in areas beyond the rim. At the bottom of page 30 and top of page 31, there is a more accurate description of the Fort Circle Parks but a puzzling statement that suggests that many of the Civil War forts are located in Rock Creek Park which is not the case. Some rewording is needed in both cases.

Adapting designed landscapes (pp. 14-15)

This section contains the statement: “**At times, there will be a need to modify designed landscapes to meet new programmatic goals and infrastructure needs;** accommodate changes in the surrounding area; and/or alter elements from different design periods or add new elements to the landscape. These modifications should be balanced in a way that contributes to the region’s design legacy.” [emphasis added] Where the landscapes at issue involve parks and open spaces, the priorities should be reversed; the objective should be to adopt or modify development and infrastructure needs to respect the public spaces.

POS.A.8 through POS.A.12 (pp. 15-16) address the need to recognize the value and intent of parks and open space landscapes and maintain a sense of historic continuity and balance those values when making adaptations or improvements to designed landscapes. These points need to include the concept of “conservation.”

Section B: Provide Stewardship of Natural and Cultural Resources (pp.17-18)

Subpart a) The text describes terrain features that contribute to the region’s natural landscape and provides examples of specific terrain features. The examples should include “the Anacostia River and its shorelines.”

Subpart b) states that a greenway system provides natural buffers that improve water quality ...” and on page 19 provides specific examples of greenways but there is no mention of the Anacostia River greenway. The examples should include the Anacostia River greenway.

Greenways (p. 18)

We agree on the importance of greenways and wonder if the wildlife migration corridors have been mapped to show connections and gaps. This mapping is vital in planning to protect and maintain greenways. If maps already exist, the Element should display them and set a goal of closing the gaps. If there are currently no maps, the Element should set a goal to create maps and to close the gaps and POS.B.3 should be amended as follows:

POS. B.3 Protect and maintain greenways for their environmental benefits and as natural and cultural resources. **Map greenways, identify any gaps in greenways, and set a goal to close those gaps.** [suggested changes in bold]

Waterways (p. 19)

Page 19 contains the statement: "The rivers often overflow their banks during high tide, covering adjacent paths with water. This presents opportunities for the federal government to improve water quality, providing for access, resilience, and recreational opportunities." The statements in both sentences are correct, but something seems to be missing to connect the "opportunities" described in the second sentence to the "flooding" statement in the first sentence.

Stewardship Opportunities (pp. 21-25)

Preservation of waterfront open space

As a result of the magnificent stewardship by the National Park Service (NPS), incredible natural resources of waterfront and open space have been preserved in the District of Columbia. NPS has been able to prevent private development of these lands through its ownership/control of these public lands in the District, including both shores of the Anacostia River waterfront and large sections of the Potomac River waterfront and much of the land adjacent. Once waterfront land is used for private residential, commercial or institutional uses, it will be lost forever as a valuable natural resource capable of being enjoyed by all. There should be no further transfer of federal park land to the District of Columbia government. The District has been a poor steward of land transferred from the federal government. After the District obtained title to Reservation 13 (DC General campus), it did adopt a master plan and zoning through a public process, but then ignored its own rules and offered the property for a Redskins training center and more recently, for Amazon's HQ2.¹ After acquiring historic Boathouse Row on the Anacostia River in 2008, the District advocated pushing city streets through a sensitive natural resource area. DC's planning has failed to take care of the needs of current residents, as opposed to Deputy Mayor for Planning and Economic Development's focus on development and raising the tax base. DC needs to give the people who live here access to parks and open space and preserve, protect and enhance those spaces. Based on the District's poor track record, we urge that no additional federal park land be transferred to the District, and NPS's stewardship of these lands be continued. We suggest adding new POS.B.19 on page 25:

POS. B. 19 The National Park Service should continue to own/control and preserve all of the open space, including the Stadium Armory area, along both

¹ Jonathan O'Donnell, "D.C.'s pitch to Amazon focuses on 4 hot neighborhoods," *Washington Post*, 17 Oct. 2017, A-14.

shores of the Anacostia and under no circumstance should any non-park or non-water dependent use be permitted within 600 feet of the Anacostia River highwater mark. [suggested changes in bold]

To implement the Anacostia Waterfront Initiative, the third full paragraph on p. 23 notes the goal to improve the river's water quality, and in the last sentence refers to "environmental guidelines for future development along the Anacostia waterfront." This reference should be changed to read, "protecting and maintaining parkland for water-dependent uses."

Minimizing effects of light pollution on wildlife (p. 22)

The Federal Environment Element does not specifically address the effects of light pollution on wildlife. (pp. 18, 20) We suggest that the Parks & Open Space Element add goals to reduce light pollution. Light pollution not only causes bird collisions with buildings, it attracts birds into urban areas and away from forested areas with more abundant food sources. In January 2018, American Bird Conservancy's collisions@lists.abcbirds.org noted:

Recent papers ... now confirm what has long been surmised: urban glow attracts birds towards the built environment. This applies primarily to migrating songbirds, found in unexpectedly high densities in areas lit at night. These birds are not circling and crashing into buildings, but as they stop over in these areas, they are vulnerable to collisions with glass, predation by cats and other unintended consequences of urban life. [emphasis added]

Most birds migrate at night through increasingly light-polluted skies. Bright light sources can attract airborne migrants and lead to collisions with structures, but might also influence selection of migratory stopover habitat and thereby acquisition of food resources. We demonstrate, using multi-year weather radar measurements of nocturnal migrants across the northeastern U.S., that autumnal migrant stopover density increased at regional scales with proximity to the brightest areas, but decreased within a few kilometers of brightly-lit sources. This finding implies broad-scale attraction to artificial light while airborne, impeding selection for extensive forest habitat. Given that high-quality stopover habitat is critical to successful migration, and hindrances during migration can decrease fitness, artificial lights present a potentially heightened conservation concern for migratory bird populations.² [emphasis added]

DOEE's Wildlife Action Plan (2015) states:

² McLaren, J. D., Buler, J. J., Schreckengost, T., Smolinsky, J. A., Boone, M., Emiel van Loon, E., Dawson, D. K. and Walters, E. L. (2018). Artificial light at night confounds broad-scale habitat use by migrating birds. *Ecol Lett.* doi:10.1111/ele.12902.

Light Pollution – The use of street lights and other sources of direct and ambient light throughout the District have the potential of being a disturbance for nocturnal and crepuscular wildlife. Bright lights can disorient and become a source of mortality for migratory birds, bats, and some invertebrates. Ch. 4, p. 112.

See also scientific studies on light pollution's effects on wildlife (mammals, amphibians, invertebrates) from International Dark-Sky Association's Artificial Light at Night (ALAN) Research Literature Database, www.darksky.org.

To insure that the lighting satisfies the most rigorous dark sky standards, we suggest that the Element specify that all new and replacement lighting fixtures on federal buildings and all lighting on federal property 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. For this reason we suggest a new POS.B.19:

POS.B.19 Minimize light pollutions by requiring that all new and replacement lighting fixtures on federal buildings meet the standards for a seal of approval from the International Dark-Sky Association. [suggested changes in bold]

Roads (p. 22)

The Element calls for protecting ecologically sensitive areas from the impacts of development. DC Department of Transportation has suggested building a commuter road (the "Park Drive") through a natural habitat area in federal parkland along the west side of the Anacostia River from Benning Road to Barney Circle.³ (see Figure 1) In the past, Events DC also included this road in its development plans.⁴ There is no need for this road—it would be a barrier to pedestrian access to the Anacostia shoreline, and further, all roads are a danger to wildlife.⁵ New or expanded roads should only be built if there is a compelling reason and no other alternative, especially in riparian areas. For these reasons, we suggest a change to POS.B. 11 on p. 24:

POS.B.11 Discourage **new or expanded roads** and paved parking areas along the shoreline of rivers, streams, and at waterfront parks. Remove existing **roads and** parking when feasible and restore those areas to a landscaped condition, which could include recreational uses. [suggested changes in bold]

³ See DDOT, Middle Anacostia Crossings Study (2005).

⁴ <https://www.rfkcampus.com/> At a public meeting on April 30, 2018, EventsDC announced that its revised access road will intersect with an existing curb cut on Oklahoma Avenue, run west away from the river, until it intersects with the river near the East Capitol Street Bridge. It is unclear whether EventsDC plans another road south of the East Capitol Street Bridge.

⁵ DOEE, Wildlife Action Plan, (2015), p. 95. Table 16 IUCN Hierarchy of Conservation Threats and TRACS Action Drivers in the District.

A minimum of 600 feet landward from the Anacostia's high-water mark should be preserved as open space and for water-dependent recreational uses. We should not allow future development to block the visual or physical access for all citizens, both now and into the future. (Six hundred feet is roughly the same as the long side of many blocks in an urban grid pattern, including the public right away on both ends of the block.) Please note there are many areas where open space of far more than 600 feet is needed. But nowhere should there be less than 600 feet. Therefore, only water-dependent open space uses should be allowed within the 600 feet area. Such uses include areas for picnicking and water-related recreational uses such as fishing and boating. And who knows, maybe in the future, if the cleanup of the Anacostia continues, there may be beaches for swimmers to soak up the sun. Non-water dependent uses should be prohibited within the 600-foot areas. A few of such uses include residential and commercial (including offices) and non-water dependent sport areas and parking lots and highway and industrial uses. For these reasons, we suggest adding a new POS.B.20 on page 25:

POS.B.20 Under no circumstance should any non-park or non-water dependent use be permitted within 600 feet of the Anacostia River high-water mark. [suggested changes in bold]

Responsible Practices to Protect Natural and Cultural Resources (pp. 25-26).

We agree that the threat from invasive species must be addressed. "Invasive plant and animal species are the greatest threat to both terrestrial and aquatic habitat types within the District." DOEE Wildlife Action Plan (2015), 98-99, 101, 103.⁶ While it is important to engage the public in appreciating and protecting open space, the federal government must take a leadership role. For this reason, we suggest the following change in POS.B.21 on p. 26:

POS.B.21 **Lead the effort** in the cleanup, planting, removal of invasive species, and maintenance of the region's rivers, trails, parks and open space. Consider opportunities to educate and engage communities **in this effort.** [suggested changes in bold]

C&O Canal

The Chesapeake and Ohio Canal (C&O Canal) restoration project is planned to improve access, address infrastructure needs, including safety and accessibility of the towpath. As we pointed out in our comments filed January 5, 2018 under NEPA and section 106 of the National Historic Preservation Act, the concept plan presented in November 2017 raises significant issues under both statutes.⁷

NEPA

The C&O Canal concept plan offers excellent ideas, including refilling the canal, restarting canal boat rides, adding a new visitor center, improved signage, and grading the

⁶ The Federal Environment Element (2016) indicates that it is important for the federal government as a guide for conservation and preservation of wildlife habitat in future development and actions. p. 18.

⁷ C100's comments on the C&O Canal, submitted on January 5, 2017 (two letters) should be posted soon on NPS's PEPC website.

towpath for safety. However, the canal has endured repeated and severe floods, scouring the canal and damaging its structure. Therefore, for the concept plan to succeed, every alternative selected must be sustainable, able to withstand flooding. For example, flood-vulnerable alternatives such as boardwalks, elevators, new flower beds, and alternatives B and C for the towpath should be re-evaluated. NPS states that the canal floods approximately every 10 years most recently in 2010. Climate change, rising river levels, and more frequent extreme rain events will combine to make future canal floods more severe.⁸

Section 106

The canal is a remarkable survival of our early Republic's and the national capital's industrial story. Though much changed in places, it is, by nature, industrial and gritty. Many of the concept plan's proposals seek to inappropriately obliterate, tame, "improve on," or redefine the very industrial character that the U.S. Congress mandated preserved for future generations as a unit of the National Park System. This is neither good historic preservation management nor approved management practices for a unit of the National Park System.

Section C: Provide Access to and Connections between Parks and Open Space

The 2004 Element included the objective of linking the Fort Circle Parks with a trail. This seems to have dropped out of the current draft. The specific objective and the objective to fill the gaps in the waterfront walk from Georgetown to the National Arboretum should be specifically noted under the "Federal Open Spaces" section. POS.C.4 or POS.C.7 should include language about filling in the existing gaps. POS.C.9 talks about linking the Civil War Defense sites with surrounding communities but not with each other. Creating a continuous trail linking the historic fort sites should be specifically included.

For the reasons set forth above concerning the need for a 600-foot set back on the waterfront, , we recommend adding a new POS.C.11:

POS.C.11: On NPS-controlled property, no non-park or non-water dependent use is permitted within 600 feet of the Anacostia high water mark.
[suggested changes in bold]

⁸ National Oceanic and Atmospheric Administration (NOAA), *Adapting to Climate Change: A Planning Guide for State Coastal Managers*, (Silver Spring, Md.: NOAA Office of Ocean and Coastal Resource Management: 2010), noaa.gov/climate/adaptation.html. United States Geological Survey (USGS), *The Chesapeake Bay: Geologic Product of Rising Sea Level* (Reston, Va: USGS, 1998), <http://pubs.usgs.gov/fs/fs102-98/>. Svetlana Jevrejeva et al., "Coastal sea level rise with warming above 2°C," *Proceedings of the National Academy of Sciences*, www.pnas.org/cgi/doi/10.1073/pnas.1605312113. National Aeronautics and Space Administration, "Adapting to a Changing Climate: Federal Agencies in the Washington, DC Metro Area," (2012) www.mwcog.org. Internet; accessed 13 Nov. 2016. Authorities cited in DOEE, *Wildlife Action Plan*, 114-117 (2015). Elizabeth Kolbert, "The Siege of Miami," *The New Yorker*, Dec. 21 and 28 (2015), 42-50, 42. NOAA, William Sweet, et al., "Sea Level Rise and Nuisance Flood Frequency Changes Around the United States." NOAA Technical Report NOS CO-OPS 073, vi (2014). DOEE, "Climate Ready DC," 2-3. DOEE, "Vulnerability & Risk Assessment," 19. Kelsey Robertson, "Resilient History: Protecting Chesapeake Bay Coastal Historic Districts from Rising Seas Through Adaptive Planning," Thesis, Masters of Professional Studies in Urban & Regional Planning, Georgetown University (2016).

Trails (pp. 29-31)

Washington Waterfront Walk

NCPC's *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 (p. 34). C100 has referred to this proposal as the "Washington Waterfront Walk." Now, 20 years later, good progress has been made with completion 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 along P Street SW from the Southwest Waterfront to South Capitol Street and (2) the section from 14th and Maine Avenue, SW across the Jefferson Memorial grounds to the Potomac River (NPS land). At the Georgetown end, an improved connection to the Georgetown Waterfront Park is needed. We believe the Parks & Open Space Element should address the next steps with the Washington Waterfront Walk, hopefully bringing the entire project to completion within the next five years.

Section D: Balance Multiple Uses within Parks

The second sentence at the beginning of this discussion should include "education" as one of the multiple uses.

The federal government should: (p. 36)

In POS.D.1 thru POS.D.7, the draft advocates minimizing impacts from development adjacent to parks and open space, including trails and parkways, to protect their natural and historic features. Here the Element should advocate that rather than minimizing such impacts, instead, to the extent possible, avoid such impacts, and any such development plans should address that if such impacts cannot be avoided, explain why they cannot be avoided and how the development will minimize such impact. There should also be a specific statement against any new roads along waterfronts.

Section E: Balance Commemorative Works within Parks

The federal government should: (pp. 39-40)

In POS.E.1 thru POS.E.9 mentions the need to balance the need for public space uses with the memorial program and "sacred" space required by memorials based on size, surrounding context, and function of site. The term "sacred" has a religious connotation, and perhaps the term "consecrated" or "reverential" or some other word should be substituted. (pp. 7, 13)

Section F: Build Partnerships and Coordination among Multiple Landowners and Jurisdictions

Partnerships and coordination are important if we are going to maximize the benefits of our parks and open space. POS.C.1 through POS.C.10 advocates improving public access to parks and open space, including removing barriers that limit physical or visual connectivity. This applies also to non-federal cemeteries, such as Congressional, in terms of the very high storm water run-off charges that are being charged to private

cemeteries.⁹ The C100 argues that they should be treated the same as public parks and open space and not subject to such charges. Access should also be improved to various private and semi-public open spaces, such as private cemeteries. We note that cemeteries are being charged very high storm water run-off rates. C100 believes that these cemeteries should be treated the same as public parks and open space, and exempted from such charges. While the narrative and POS statements mention private and non-profit entities as partners, it would be beneficial to have more discussion and provide some examples such as Mount Vernon and Congressional Cemetery.

We appreciate the opportunity to comment on the draft Element and thank you for considering our comments. We look forward to seeing the final document.

Respectfully submitted,



Stephen A. Hansen
Chair

Attachments:

Attachment A: Bird-safe federal buildings (below)

[Committee of 100 Comments on C&O Canal Historical Park - NEPA](#)

[Committee of 100 Comments on C&O Canal Historical Park - Section 106](#)

cc:

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Attn: Comprehensive Plan Public Comment

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Thomas Luebke, Secretary -- U.S. Commission of Fine Arts

Eric Shaw, Director

⁹ WASA's Impervious Area charge has caused Congressional Cemetery's annual water bill to increase from \$350 to over \$200,000: <https://www.nbcwashington.com/investigations/Historic-DC-Cemeteries-in-Jeopardy-of-Closing-Due-to-Growing-Water-Bills-452918463.html>

Figure 1. Proposed route of the "Park Drive" along the west bank of the Anacostia River from Benning Road to Barney Circle through NPS parkland. DDOT, Middle Anacostia Crossings Study (2005), p. 7-1 (2005). Red arrows point to the "Park Drive."

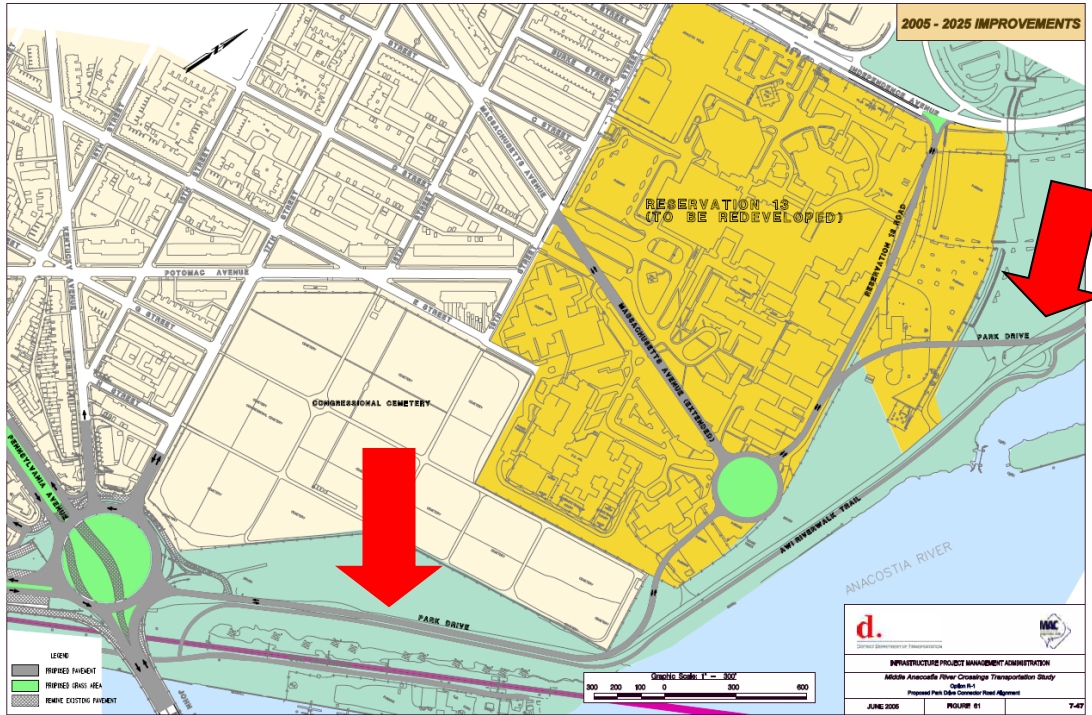
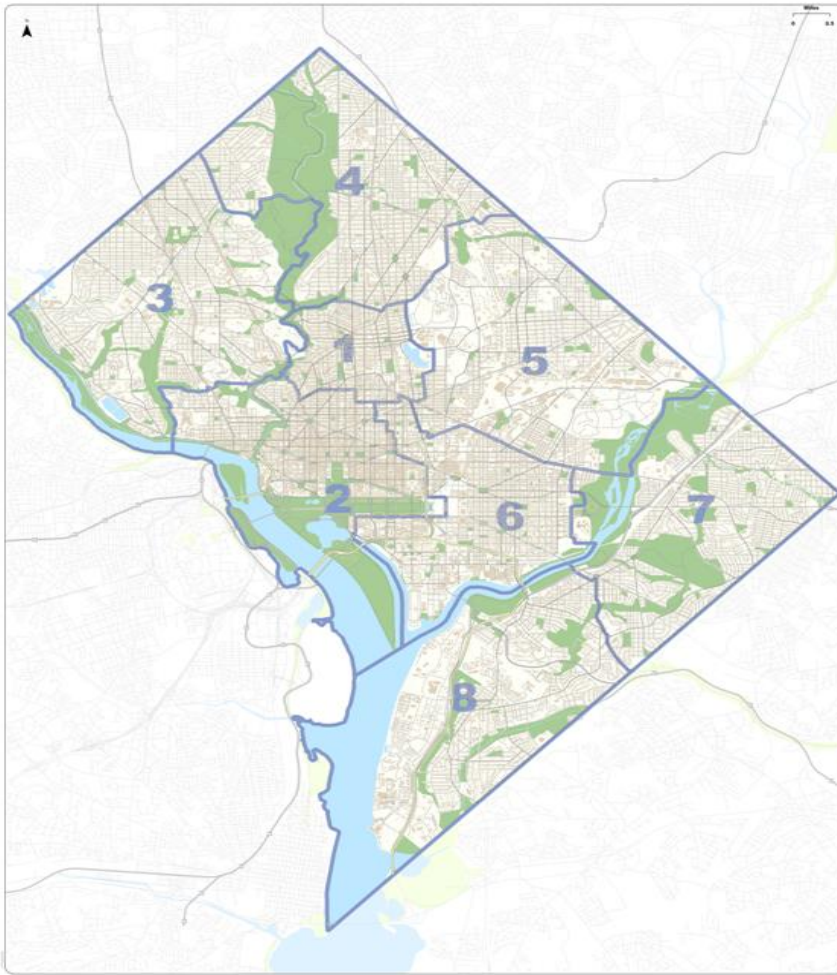


Figure 2. Ward 6 sorely needs parkland at or near the waterfront.



Parkland in green



Office of Planning ~ January 8, 2018
Government of the District of Columbia



This map was created for planning purposes from a variety of sources. It is neither a survey nor a legal document. Information provided by other agencies should be verified with them where appropriate.

Ward 6 has less waterfront parkland than any other Ward that borders a river.¹⁰

¹⁰ The acreage of parkland on the map, subdivided by Wards that border the Potomac and Anacostia rivers:

- Ward 2: 1485 acres
- Ward 3: 1364 acres
- Ward 5: 519 acres
- Ward 6: 192 acres**
- Ward 7: 1554 acres
- Ward 8: 850 acres

Attachment A

Bird-safe federal buildings (p. 22)

This section of the Parks & Open Space Element advocates allowing wildlife to follow natural migration patterns. p. 22. The Federal Environment Element (2016, pp. 18, 20) does not specifically address the effects of light pollution on bird deaths from collisions with federal buildings, or bird migration, and for this reason we suggest that these important issues be addressed in the next revision of the Federal Environment Element.

Many migrating birds are killed in collisions with buildings in DC. For this reason, we urge that this section mandate bird-safe measures on federal buildings to protect migrating birds. The federal government has already taken some steps to reduce bird collisions, and we hope that NCPC will build on this success.

We think of the District as an urban area. But in fact, the District is home to an average of 230 bird species year-round, and is also on the Atlantic flyway, and attracts thousands of migrating birds every spring and fall that stop here to rest and feed before continuing their journey. More than 60 species breed in the District, and our rivers are wintering locations for thousands of waterfowl.¹¹ The U.S Fish and Wildlife Service recognizes that "cities can become effective sanctuaries for birds and other wildlife." The District has joined other U.S. cities to become a U.S. Fish and Wildlife Service Urban Bird Treaty City in 2011.¹²

Collisions with structures may account for between 100 million and one billion bird deaths per year, as estimated by the U.S. Fish and Wildlife Service (2002). The D.C. Department of Energy and Environment (DOEE) Wildlife Action Plan (2015) concurs with these findings.¹³ Bird deaths from collisions can also affect the viability of bird

¹¹ DOEE, Wildlife Action Plan, p. 12, 13.

¹² The Urban Bird Treaty program is a unique, collaborative effort between the U.S. Fish and Wildlife Service and participating U.S. cities bringing together private citizens, Federal, State, and municipal agencies, and non-governmental organizations. Cities can become effective sanctuaries for birds and other wildlife, with an environmentally aware citizenry dedicated to conserving and enhancing natural resources. This is not only good for the birds, but also for the quality of life of people living in and visiting our cities. By restoring and conserving green-space, Urban Bird Treaty cities enhance urban areas for migratory birds that nest, overwinter, or pass through municipal and urban/suburban neighborhoods as well as for citizens. The Urban Bird Treaty program has an emphasis on education and outreach programs and includes resources for constructing schoolyard habitat sites, creating backyard habitats, and resources for educating citizens about birds and their conservation in an urban environment. Key features of the program also includes suggestions for reducing hazards to birds during migration; restoring, enhancing, and protecting avian habitats; providing education and outreach opportunities in urban and suburban communities; monitoring bird populations when appropriate; and creating and building career awareness and career development opportunities for young people." www.fws.gov/birds. Internet; accessed 13 Mar. 2016.

¹³ DOEE's Wildlife Action Plan states: "**Collisions with Glass and Buildings** – An estimated 300 million to 1 billion birds are killed annually from collisions with glass on buildings and homes. The urban character of the District creates a dangerous gambit for migratory and residential species." Wildlife Action Plan, Ch. 4, p. 100, citing C. L. Seewagen and C. Sheppard. 2014. [Bird collisions with windows: An annotated bibliography](#). American Bird Conservancy, Washington, DC, 23 pages.

populations. Of all the bird species in the US, nearly one-third have been documented to be victims of collisions with buildings. Deaths of migrating birds include some of the strongest, healthiest birds, who otherwise would have survived to breed.¹⁴

Lights Out DC is a citizen science project run by City Wildlife that monitors downtown buildings in the District and collects victims of bird strikes. Over the past six years, *Lights Out DC* has collected more than 1,500 bird victims in just five buildings in a small area of downtown.¹⁵ See table below. Types of collision threats to birds include transparent or reflective glass skyways and transparent glass areas illuminated at night.

Buildings monitored by *Lights Out DC* showing the number of bird strikes 2010-2015

Building & type of bird hazard¹⁶	2010	2011	2012	2013	2014	2015	Total	% Released	% Dead
Thurgood Marshall Federal Judiciary Building 1 Columbus Circle, NE Transparent glass, plant-filled atrium, angled walls, reflections	36	23	31	39	48	32	209	43%	57%

¹⁴ US Fish and Wildlife Service, *Migratory Bird Mortality: Many Human-Caused Threats Afflict Our Bird Populations*. (2002). Lesley J. Ogden, *Collision Course: The Hazards of Lighted Structures and Windows to Migrating Birds*, special report to the World Wildlife Fund Canada and the Fatal Light Awareness Program. Stephen B. Hager, Heidi Trudell, Kelly J. McKay, Stephanie M. Crandall and Lance Mayer "Bird Density and Mortality at Windows," *The Wilson Journal of Ornithology* 120(3): 550-470 (2008). Yigal Gelb and Nicole Delacretaz, "Windows and Vegetation: Primary Factors in Manhattan Bird Collisions," *Northeastern Naturalist*. 16(3):550-564. Christopher J. Klem, Jr., Nicole Delacretaz, Yigal Gelb, Peter Saenger, "Architectural and Landscape Risk Factors Associated with Bird-Glass Collisions in an Urban Environment," *The Wilson Journal of Ornithology* 121(1): 126-134 (2009), cited in San Francisco Department of Planning, "Standards for Bird-Safe Buildings," (2011). C. L. Seewagen, C. Sheppard. 2014. *Bird collisions with windows: An annotated bibliography*. American Bird Conservancy, Washington, DC. 23 pages, cited in DOEE's Wildlife Action Plan, p. 100.

¹⁵ The number of collisions is likely higher than the figures above because researchers probably did not find 100% of birds killed. The birds killed by collisions at these buildings include dozens of species, both resident and migrating birds, and many birds classified by DOEE as "Species of Greatest Conservation Need" (SGCN). SGCN bird species are those "that are indicative of the diversity and health of the District's wildlife, including low and declining populations. ... The District's resident and breeding species keep the nation's capital high in biodiversity and ecologically healthy." In other words, birds dying from collisions with buildings include a wide range of species, not just birds that we may think of as common. For example, volunteers found ovenbirds, indigo buntings, black-throated blue warblers, ruby-throated hummingbirds, and woodcocks.

¹⁶ In 2010, *Lights Out DC* volunteers walked their routes only 2 days per week. In all other years, volunteers monitored 7 days per week. Thus, calculations of bird strike reductions have been based on 2010 figures that were extrapolated from the 2010 data shown here.

Thurgood Marshall Federal Judiciary Building, 1 Columbus Circle, NE

The glass atrium in this building had been the source of many bird collisions, in part because there are live trees in the atrium. The Architect of the Capitol, which manages this building, reduced nighttime lighting immediately upon learning of the problem in 2011. Between 2011 and 2014, the atrium lighting was reduced between 11 pm and 6 am during migration seasons, and bird collisions were reduced by 2/3. Now the atrium lighting is reduced from 11 pm and 6 am all year round. (Collision statistics are pending.) The energy savings of this reduced lighting are significant, from an atrium load of 77 kW to 4.25 kW during the night. Over a period of a year, energy use has been reduced by 28%.

LEED Pilot Credit 55: Bird Collision Deterrence (2015) is widely accepted and effective method to reduce bird collisions. See also Federal Bird-Safe Buildings Act of 2017, HR 2543 (introduced 18 May 2017). For these reasons we suggest a new POS.

new POS. Support bird migration by adopting bird-safe measures on all new federal buildings, and, where feasible, retrofit buildings for bird safety.

[suggested changes in bold]