



Government of the District of Columbia
ADVISORY NEIGHBORHOOD COMMISSION 3/4G

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ANC 3/4G Resolution Regarding
NPS' Beach Drive Environmental Assessment

1. ANC 3/4G submits this Resolution to the National Parks Service (NPS) as our comments on NPS's Upper Beach Drive Management Plan Environmental Assessment (EA) released in July 2022. NPS prepared the EA due to increase recreational use observed on the closed portions of Beach Drive and other parkway roadways. This plan sets out to examine the management of the northern portion of Beach Drive and several adjacent roadways to develop a comprehensive management approach for upper Beach Drive and adjacent roadways to improve recreational opportunities, address needs of motorized and nonmotorized users, and minimize resource impacts. The plan also seeks to amend the 2007 Rock Creek Park and the Rock Creek and Potomac Parkway Final General Management Plan.
2. Beach Drive, which bisects the length of the park from the Maryland state line to the Rock Creek and Potomac Parkway, was originally designed as an internal park road to provide recreational access.
3. In 1966, the National Park Service set motorized access limits to Beach Drive to allow pedestrians and bicyclists use. The closure was on Sundays only along the section of Beach Drive between Joyce Road and Broad Branch Road.
4. On April 11, 2020, at the start of the pandemic, the Superintendent of Rock Creek Park temporarily extended the weekend/Holiday closures to the upper portion of Beach Drive NW with the intention of leaving this section closed until April 30, 2021. The closure was designed to allow District residents to use the road for socially distanced recreation during the COVID-19

pandemic. The NPS temporarily closure of the upper portion of Beach Drive was extended until September 5, 2022. The closures provided a valuable opportunity for park visitors to recreate more freely and safely within Rock Creek Park.

5. On March 23, 2021, the District of Columbia Council, Committee on Transportation and the Environment, held a public roundtable on the Beach Drive closure where the vast majority of District residents who testified supported closing upper Beach Drive to cars on a permanent basis. During the roundtable, District Department of Transportation (DDOT) stated that should the NPS decide to close upper Beach Drive to cars on a permanent basis, it could ensure alternative routes to Beach Drive were sufficiently able to absorb the resulting possible increase in traffic.
6. On April 23rd, proposed resolution PR24-0212, “Sense of the Council Requesting the National Park Service Permanently Close Beach Drive to Cars Resolution of 2021,” was introduced by Councilmembers Cheh, Pinto, Nadeau, Lewis George, Bonds, and Allen. On June 1, 2021 the Council resolution passed 9-4. In addition to the Council’s passage of its resolution, DC Delegate Norton requested¹ permanent parkway closure and the Montgomery County Council passed its own resolution² (9-0) requesting the parkway remain closed to motorized users.
7. On July 8, 2021, the NPS began a public engagement process to allow the public an opportunity to share its thoughts on the future use of the northern part of Beach Drive. Those members of the community who have been engaged in the process are sharply divided on parkway usage. Some urging the parkway remain open to motorized users (pre-pandemic conditions) and others urging the continued closure of park roadways.
 - A petition from the People's Alliance for Rock Creek and the Washington Area Bicyclist Association garnered more than 4,000 signatures to keep Beach Drive closed to traffic and the support of over 20 local and regional organizations. During August and September 2021, volunteers counted nearly 29,000 users — including 17,000 cyclists, 5,000 runners, and 5,000 walkers — during 56 hours of periodic counting over 12 days³.
 - A competing petition to return the road to vehicles on weekdays garnered 1733 signatures.

¹ <https://norton.house.gov/media-center/press-releases/norton-requests-permanent-closure-of-portion-of-beach-drive-to-motor>

² https://apps.montgomerycountymd.gov/ccllms/DownloadFilePage?FileName=10104_1_15498_Resolution_19-892_Adopted_20210615.pdf

³ <https://waba.org/parc/>

- During the NPS public scoping period, it received more than 2,400 pieces of correspondence, equating to more than 4,100 individual comments⁴. The highest number of comments (1,838) expressed support for alternative 2 (full closure for recreation). 343 comments expressed support for alternative 1 (No action - return to Pre-pandemic management), citing interest in returning the roadway to vehicle use.
8. Out of the three alternatives considered (No action - return to pre-pandemic management; full closure for recreation; and seasonal closure for recreation), NPS has identified alternative 3 (seasonal closure) as its preferred alternative. According to NPS, this decision is a compromise for those who use the roads for recreational and other purposes and those who travel through the park for commuting and scenic pleasure driving.
 9. It should be noted that DDOT stated the decision to close the Upper Beach Drive needs to “evaluate the users of Rock Creek Park, the surrounding neighborhoods, and the travelling public.” DDOT also pointed out the permanent closure is especially impactful given the ongoing/planned major roadway projects, including Connecticut Avenue and 16th Street projects. DDOT opined a midday closure would be acceptable, but noted the concerns with this alternative. DDOT listed several improvements that could mitigate traffic impacts along with other recommended additional improvements for consideration in the area.
 10. There are several aspects of NPS’ decision and DDOT’s traffic study analysis that raise concern:
 - The data DDOT uses in its traffic modeling is from pre-COVID traffic levels. This method takes into account Beach Drive traffic levels pre-pandemic when the roadway was open to motorized users.
 - Most data counts were in fact, as stated by DDOT, from 2017-2019.
 - DDOT also acknowledges they could not obtain new counts due to the closure of Beach Drive NW/Upper Beach Drive and COVID-19 traffic volume impacts.
 - NPS makes a troubling argument that the best way to manage social trails is by increasing motorized users. Park Superintendent Washburn advised that vehicles traveling through Beach Drive “create a deterrent,” that prevents people from cutting through the park on unofficial trails. This form of weaponization of vehicles against non motorized users is dangerous and according to NPS’ own assertions, “potential conflicts between cars and bicycles would be greater on weekdays because of the shared use of roadways.”⁵

⁴ <http://parkplanning.nps.gov/beachdrive>

⁵ page 18, paragraph 2

- NPS acknowledges that the increased use of unofficial trails has been recently observed. However, NPS doesn't acknowledge that this increased use is likely related to pandemic conditions, or the length of time these trails have been in existence. NPS is silent on other alternatives other than increase motorized traffic as a use deterrent and does not offer empirical evidence to support this claim.
- NPS' preferred alternative seems out of step with local climate and transportation goals. DC's climate goals are in part reflected in our Sustainable DC 2.0 plan⁶. Under this plan, it's the Mayor's goal to make DC environmentally sustainable. Relevant to NPS's decision, the plan focuses on 13 core areas, but four core areas, which relate to broader DC goals, seem particularly relevant to the Beach Drive decision:
 - Health: Relates to Healthy People 2020, Age-Friendly DC, Health Equity Report;
 - Transportation: Relates to Move DC, Vision Zero, Clean Energy DC;
 - Nature: Relates to State Wildlife Action Plan; and
 - Climate: Relates to Climate Ready DC, Clean Energy DC, Resilient DC.

NPS' ultimate decision should align and not conflict with DC's broader sustainability goals. For example, Sustainable DC 2.0 sets the goal of reducing commuter trips by cars to 25% by 2032.

11. NPS' decision is not a zero sum game. It does offer several solutions for the majority of users. However, NPS's preferred option, #3, clearly prioritizes motorized users. Our priority should be the safety of our community and achieving our climate and transportation goals. The COVID-19 pandemic has allowed us an opportunity to reimagine our public spaces and create opportunities to prioritize people, throughout our transportation and public space infrastructure.

Therefore:

12. The Commission understands the deep complexity in NPS' decision to strike a balance in meeting the needs of motorized and recreational users. The Commission recognizes and appreciates the comments from the general public, particularly those from members of ANC 3/4G.

13. It is the Commission's opinion, that NPS' decision to support alternative 3 is not in the long-term best interest of communities that live adjacent to Rock Creek Park and the District as a whole, and urges NPS to adopt alternative 2 (full closure for recreational use).

⁶ https://sustainable.dc.gov/sites/default/files/dc/sites/sustainable/page_content/attachments/sdc%202.0%20Edits%20V5_web_0.pdf

14. The Commission urges NPS to and DDOT to obtain more recent traffic impact analysis and base the EA on those outcomes.
15. The Commission urges NPS to align its decision with the Districts broader environmental, health, and transportation goals outlined in Sustainable DC 2.0, Vision Zero, and other DC policy guidance documents.
16. The Commission urges DDOT to immediately pursue budget authority and implementation of its recommended infrastructure improvement projects to mitigate permanent closure.

FAILED at ANC 3/4G's properly noticed public meeting on July 25, 2022, by a vote of 3 Yes (Commissioners Chang, Gore, and Zeldin), 4 No (Commissioners Gosselin, Caldwell, Higgins, and Speck)), and 0 abstentions (a quorum being 4).



Lisa R. Gore, Chair



Peter Gosselin, Secretary