



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

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Comments by ANC 3/4G Commissioners
Speck, Cadwell, Gosselin, and Higgins
On the Beach Drive Closure
Environmental Assessment
August 8, 2022

Randy Speck has been the Advisory Neighborhood Commissioner for ANC 3/4G03 in Chevy Chase, DC, since January 2013, and lives at 2940 Northampton Street, NW, about two blocks from Rock Creek Park, for 36 years. He has used the Park extensively for recreation throughout that time, including particularly during the past two years. Charles Cadwell, Commissioner for ANC 3/4G07, has lived at 5207 38th St., NW, for 35 years and in Barnaby Woods for six years prior to that. He is a frequent user of both hiking trails and bike access to the park. Peter Gosselin, Commissioner for ANC 3/4G06, has lived at 3701 Military Road, NW, for 24 years. John Higgins, Commissioner for ANC 3/4G02, which includes the western portion of the Park, lives at the Knollwood Military Life Plan Community at 6200 Military Road, NW, and has lived in the Chevy

Chase Community for 45 years. Although we represent a majority of ANC 3/4G, our comments represent our own views as individual commissioners, not those of the Commission as a whole.¹

The National Park Service's (NPS's) July 2022 Upper Beach Drive Management Plan Environmental Assessment (EA) proposes a compromise that will neither satisfy those who insist that the Park remain closed to motorized vehicles, as it has been during the pandemic, nor those who insist that the Park remain completely open (except on weekends and holidays), as it was before the pandemic. Those who seek to close the Park permanently to motorized vehicles make a strong case based on environmental and safety considerations, and this may be a valid aspirational goal. The advocates for opening the Park to motorized vehicles on weekdays argue that this configuration provides greater access to those with significant mobility issues, uses the road for its designed purpose, and minimizes environmental and safety concerns that would be created by diverting traffic to neighborhood streets.

NPS has chosen a hybrid approach. Its preferred alternative 3 would close upper Beach Drive to motorized vehicles from Memorial Day to Labor Day and open it on non-holiday weekdays for the remainder of the year. This is not the compromise that we

¹ The Commission considered a resolution on July 25, 2022, that would have supported alternative 2 in the Environmental Assessment (i.e., full closure for recreational use), but the proposed resolution [failed](#) by a vote of 3 in support, and 4 opposed (a quorum being 4). The four dissenting commissioners submit these comments.

would have preferred — e.g., open during rush hours but closed other times² — but the EA explains NPS’s reasons for rejecting this alternative.³

Considering all the information provided in the EA and in the DDOT Study, NPS’s preferred alternative 3 is not unreasonable, but we suggest two changes. First, because other expected infrastructure changes — e.g., the installation of bike lanes on Connecticut Avenue — are not imminent, NPS could continue the status quo until January 1, 2023, thus permitting DDOT to gather additional data bearing on NPS’s decision. Second, when NPS implements alternative 3, it should work with DDOT to gather comparative traffic and Park use data when upper Beach Drive is open and closed so that it can annually reevaluate the efficacy of its preferred hybrid approach to see whether it remains the optimal use of upper Beach Drive.

While DDOT’s June 2022 Traffic Study should not be the final word on the impact of upper Beach Drive on traffic in adjacent neighborhoods, it provides a reasonable basis today for NPS’s analysis. Our Commission has long advocated for a comprehensive review of the impacts that changes to road configurations will have, and DDOT has finally done that in its latest report. As DDOT notes, “a new traffic study was conducted because the original modeling [in October 2021] did not incorporate four major projects that could potentially impact traffic volumes in the study area.” [DDOT Study](#) at i.

² See the [video](#) of ANC 3/4G’s June 14, 2021 meeting at 1:18:40.

³ NPS “dismissed these configurations because they would present considerable operational and communication challenges for park staff.” [EA](#) at 15. The District Department of Transportation (DDOT) also concluded that opening to motor vehicles only for rush hours “would present issues with pedestrian/bicyclist expectancy of when traffic would be on Upper Beach Drive and the maintenance/cost of implementing this daily operation.” DDOT Upper Beach Drive Management Plan — Traffic Study, June 2022 ([DDOT Study](#)) at v.

Our Commission has relied on DDOT's expert analysis for other crucial projects in our neighborhood — e.g., the Connecticut Avenue Reversible Lanes study in our [April 26, 2021 resolution](#) and for the traffic impacts from a proposed Maret School sports field in our [February 28, 2022 resolution](#). Both of those studies used the same 2017-2019 data that is the basis for DDOT's upper Beach Drive study ([DDOT Study](#) at 10-11). Until there is more experience with what may be a new normal, it is reasonable to rely on DDOT's judgment about the use of this data. Using this analysis, we have no basis to disagree with NPS statement that "implementation of this plan would neither increase nor decrease motorized use in upper northwest Washington, DC," and that once other infrastructure projects are completed, this traffic will be diverted to other streets in the area whenever upper Beach Drive is closed.

DDOT finds significant negative impacts from year-round closure.

The permanent all-year closure is especially impactful **when several previously listed transit or bicycle oriented multi-modal safety enhancement projects are constructed along the parallel corridors**. The concerns are as follows:

- Additional travel time of approximately 7.5 minutes in the peak hour peak direction.
- **Additional congestion cost of over \$18 million dollars annually.**
- **Over a 50% increase in emissions in the peak hour, peak direction.**
- Six additional intersections operating at [Level of Service] E or F in the AM peak hour and four in the PM peak hour although one intersection will improve with the closure.
- **Additional traffic on the local and collector streets in the Barnaby Woods area of northwest DC plus streets.**

- **The ability to provide east-west connections for school access.** ([DDOT Study](#) at vi.) (Emphasis added.)

Based on DDOT's analysis, there would be significant projected increases in traffic in the neighborhoods immediately west of the Park — e.g., on Oregon Avenue, Military Road, Western Avenue, Utah Avenue, Broad Branch Road, and Chestnut Street — when accounting for the impact of other expected projects. [DDOT Study](#) at 17. We have no basis to disagree with these findings without rejecting the underlying data that our Commission relied on in DDOT's Connecticut Avenue and Maret sport field studies.

NPS's and DDOT's rationale for choosing to close Beach Drive from Memorial Day to Labor Day instead of for a longer period is reasonable. As DDOT found, "Traffic volumes in April, May and September are similar to the remainder of the year, therefore from a traffic standpoint this would cause the same levels of congestion as during the late fall/winter/early spring. The Memorial Day to Labor Day period volumes are reduced by about 10% which would mean less congestion would be anticipated during that time." ([DDOT Study](#) at v.)

In any case, DDOT should implement the measures that it describes to reduce the impact of traffic on other streets whenever Beach Drive is closed and irrespective of when other infrastructure projects come on line. The traffic calming measures for Western Avenue and Utah Avenue are particularly important ([DDOT Study](#) at 43). DDOT should also implement the traffic safety measures that it identified in its [February 25, 2022 Maret sports field study](#) (at page 12) for the intersections of Nebraska Avenue and Utah Avenue and 27th Street and Military Road.

One of NPS's justification for its preferred alternative is unreasonable, however, and it should be deleted from the EA. NPS argues that keeping Beach Drive open to

traffic from Labor Day to Memorial Day will somehow reduce the use of social trails and the threat to the Hays Spring amphipod. It is true that there has been a startling increase in these social trails since the pandemic closure — “Data collected two years later showed a marked increase in miles of unofficial trails from 21.5 miles to 30 miles, 8.3 miles [sic] more than previously observed (Figure 4).” EA at 25. NPS specifically concluded, however, that “Implementation of Hays Spring amphipod conservation measures should protect the amphipod from potential visitor impacts associated with social trails As a result, this impact topic is dismissed from further analysis in this EA.” (EA at 9.) Social trails are clearly a problem, but the solution does not require opening Beach Drive to traffic. NPS should not rely on this rationale for any decision about the use of upper Beach Drive by motorized vehicles but should implement the conservation measures that it has agreed to enforce.

The adverse consequences that DDOT predicts will flow from closure of upper Beach Drive are apparently triggered in part by plans for major changes to four other routes for motor vehicles traveling downtown, only one of which is fully completed. [DDOT Study](#) at i. That gives NPS some flexibility on the timing for implementing its preferred alternative. If the status quo does not currently create adverse ramifications, NPS could consider deferring opening upper Beach Drive until January 1, 2023, when it may have additional data about the prospective impacts, especially as thoroughfares with much higher current volumes (such as Connecticut Avenue) are redesigned to allow multimodal uses. The combined diversion effects of these projects, coupled with unknown levels of employees’ hybrid work in the future or increased use of mass transit all suggest that there will be increased pertinent data. Beach Drive is part of the picture,

but not the whole picture. During this period, NPS should also reconsider the possibility of closing Beach Drive to motorized vehicles year round during non-rush hours.

Finally, and most importantly, NPS pledges to remain flexible, and it should continue to evaluate other alternatives, including options beyond the three discussed in the EA. “The selection of the preferred alternative does not prevent the superintendent from altering the management of upper Beach Drive in the future, based on changes to the condition of park resources and visitor experience.” (EA at 14). It will be easy to close Beach Drive for longer periods each year, for periods during the day year-round, or even completely if traffic turns out to be less than DDOT projects — which is a distinct possibility. Unlike the proposed changes for Connecticut Avenue, there will be no expensive infrastructure that will need to be modified if NPS decides to change the closure period. NPS should ask DDOT to update its traffic analysis annually, and it should establish an annual review process to ensure that its decisions about closure of upper Beach Drive continue to be reasonable based on the most recent data.