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Surina Singh, Project Director
Attn: Comprehensive Plan Public Comment
National Capital Planning Commission
401 9th Street, NW, Suite 500N
Washington, DC 20004

surina.singh@ncpc.gov

April 18, 2018

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

Dear Ms. Singh:

The Capitol Hill Restoration Society (CHRS) is the largest civic organization on Capitol Hill. For over 60 years CHRS has advocated for the welfare of the Capitol Hill community, including sound land use planning and protection of parks and the environment. We appreciate the Commission's leadership on preserving federal parks and open space and are honored to submit comments on the draft Parks & Open Space Element, arranged in order as they appear in the Element:

Stewardship Opportunities (pp. 21-25)

Preservation of waterfront open space

As a result of the 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 lands 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. 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 should continue. We suggest adding new POS.B.19 on page 25:

new POS. B. 19. The National Park Service should continue to own/control and preserve all of the open space federal parkland, including the Stadium Armory area, along the north and south shores of the Anacostia River. [suggested changes in bold]

Similarly, we suggest a new POS.C.11 on p. 32:

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

Roads (p. 22)

The Element calls for protecting ecologically sensitive areas from the impacts of development. EventsDC has joined the DC Department of Transportation to suggest 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. Please see Figure 1. The road would block access to the waterfront and to the Anacostia Riverwalk Trail, and in one area, would be directly next to the trail, endangering pedestrians and cyclists moving to and from the trail through Capitol Hill. In addition --

- The proposed road is in a 100-year floodplain. No road should be even built here.²
- This is a natural resource area and roads are a danger to wildlife; roads reduce habitat connectivity, are an impediment to dispersal and foraging, and are a source of polluted stormwater runoff.³

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

² DOEE, "Vulnerability & Risk Assessment: Climate Change Adaptation Plan for the District of Columbia" (2016), Map 4 (500-year flood plain, 2080). DOEE, "Relative Sea Level Rise inundation predictions in Washington, DC for 2018, 2068, and 2100." US Army Corps of Engineers, from DOEE, "Wildlife Action Plan," 124 (2015). Present-day Storm Surge From Category 1, 2, and 3 Storms. DOEE, "Climate Ready DC," 4.

New or expanded roads should only be built if there is a compelling reason and no other alternative. 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 parking when feasible and restore those areas to a landscaped condition, which could include recreational uses. [suggested changes in bold]

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 and 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

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

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.⁴

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 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 on p. 25:

new 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]

Parkways as Scenic Routes (pp. 34-36)

As noted on p. 34, "visual and physical encroachment on and adjacent to parkways is an important challenge threatening the scenic and pastoral qualities of parkways" Maintaining an open space along riverfront parkways will contribute to preserving parkway viewsheds. For this reason we suggest a new POS.D.8 on p. 36:

new POS.D. 8. An open space parkland at least 600 feet wide along the entire north shore of the Anacostia River should be developed/required. [suggested changes in bold]

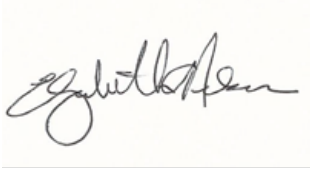
Balance Multiple Uses Within Parks (pp. 33-36)

This section advocates "programming that supports recreation, education, commemoration, and special events while protecting natural and cultural resources." POS. D.2, p. 36. There is a documented need for additional recreation space, and we urge that the RFK Stadium property, owned by NPS and leased to District government, be developed to maximize recreation space, and minimize parking and other non-recreation uses. CapitalSpace (2010).

⁴ 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.

Thank you for considering our comments. For questions or additional information please contact CHRS at 202 543-0425 or email to info@chrs.org.

Sincerely,

A handwritten signature in black ink on a light yellow background. The signature is cursive and appears to read "Elizabeth Nelson".

Elizabeth Nelson, President

cc: Councilmember Charles Allen email: callen@dccouncil.us

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

