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August 22, 2021

**Comments of the National Association for Olmsted Parks
Re: Upper Beach Drive Management Plan, Rock Creek Park**

Summary

As the Olmsted Brothers rightly outlined in their 1918 Rock Creek Report, landscapes are not static. Nor should ideas about them be static. If there is a silver lining to the pandemic, it is the opportunity for park officials and others to revisit the use of their public spaces. We know that in recent months access to safe and open greenspace has proven essential to our physical and mental well-being and helped to bring us together as a people – all goals that Frederick Law Olmsted espoused in developing parks for all people in the late 19th century.

In the words of the Olmsted Brothers, land management is a dynamic process: park preservation involves “an unending watchful struggle to neutralize destructive forces inevitably acting on the scenery; to reinforce and supplement its natural powers of resistance and recuperation.” Their 1918 report on Rock Creek outlines the desirability of reasoned regulation and sets forth guidelines to help shape land management in the Park: preserving scenic beauty; restraining development; encouraging natural resiliency and restoration; promoting recreative value; and opening the park to driving, riding and walking in a way respectful to the topography.

Since the 1980s, the National Park Service (NPS) limited access to Rock Creek Park between Wise Road and Broad Branch. This stretch was closed to cars on weekends, but open to pedestrians and bicyclists. As of April 2020, these parts of Beach Drive have been entirely closed to vehicular traffic. The NPS is seeking public comment on whether these sections of Beach Drive should remain closed to vehicular traffic; reopen for vehicular traffic during the week; and other options. These comments are submitted in response to the Environmental Assessment required by the National Environmental Policy Act and the Section 106 public review process required by the National Historic Preservation Act.

As outlined below, the National Association for Olmsted Parks (NAOP) supports continued closure.

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History and Discussion

Rock Creek Park is the oldest urban national park and an extraordinary natural amenity in the heart of the nation's capital. For over 100 years, it has given city dwellers and visitors access to a unique and varied landscape. By Act of Congress in 1890, the park was established to "give incalculable enjoyment and healthful recreation to the people of the District in future generations."

Advisors to the Park, the landscape architectural firm, Olmsted Brothers, released a detailed report in 1918 (*Rock Creek Park: A Report by the Olmsted Brothers*) which outlines the purposes of the Park and provides guidance to future generations on how to maintain and sustain the park. ⁱ

The Olmsted firms undertook nearly 6000 projects across America over a period of 100 years. And a key part of their landscape legacy is thoughtful guidance and directions for conservation, preservation and maintenance. That is surely the intent of the 1918 Report which explored landscape types, administration and roads to assist in future land management decisions which should inform NPS's ongoing and future management decisions.

In guiding future use and management, the Olmsted Report set out key considerations:

- 1) **Achieving a balance of preservation and public visitation.** "The dominant consideration, never to be subordinated to any other purpose in dealing with Rock Creek Park, is the permanent preservation of its wonderful natural beauty, and the making of that beauty accessible to the people without spoiling the scenery in the process."
- 2) **Restraining development.** "In its development, the guiding policy should be distinctly one of restraint; in its maintenance the policy should be liberal, in order to meet the continuously increasing needs of the patrons and still more to protect and insure the permanent values of a great public investment."
- 3) **Promoting natural resiliency and restoration.** "The scenery of the Park cannot remain static.... The great problem of its management is to convert progressive deterioration into progressive restoration." The Report notes deterioration caused by lumbering; plant and insect diseases; fires; and "weed growth."ⁱⁱ
- 4) **Providing recreative value.** "The real justification for this large park is ... the recreative value of its natural qualities ... and no use or exploitation or development of any sort can ever be right that is not based upon this fundamental conception."

Acknowledging that the park will be enjoyed “by large and ever larger numbers of people, poor and rich alike,” and the need for far more “intensive use” and “ready accessibility,” the Olmsted Brothers call for “a little regulation.” It would be clear folly, they write, “to allow the sum total of park value to deteriorate for want of a little regulation that would ensure ultimately a far higher degree of service to the public as a whole – the owners of the Park.”

In approaching park development, they then set out three fundamental considerations:

- a) the scenery—comprised of larger landscapes made by ground forms and typography and more intimate smaller scenery -- must be saved intact insofar as possible;ⁱⁱⁱ
- b) “adequate transportation must be provided to and into the Park for people dependent upon street car service”; and
- c) the “park must be opened up to the driving, riding, and walking public; but the roads, paths and other accompaniments of intensive use must be so located and so built that the essential qualities of the Park are impaired in the least possible degree.”

Noting that the “question of thoroughfares crossing the park is a complex one,” the Olmsted Brothers rejected a traffic corridor that traversed the creek bottom, in favor of a high level viaduct: “the obtrusion into the ‘very heart of the park’ of the noise and tangle of heavy trucks and electric cars – conditions of the city – would be a very serious detriment to the Park.”^{iv}

Applying the Olmsted Brothers’ thoughtful guidance, the NPS regulation of the Park – and, in this instance, management of Beach Drive – must balance the need to preserve and protect this urban treasure with broad-based and respectful citizen visitation. It must ensure a healthy park that fosters various sceneries and progressive restoration and resiliency through the promotion of healthy forests, water and wildlife. No actions should be taken that would undermine the essential “recreative value” of the park.

For these reasons, we support continued closure of Beach Drive as outlined below.

Continued closure will enhance recreative value.

Automobile commuter traffic through the upper reaches of the Park does not advance the park's recreational mission. Indeed, the NPS General Management Plan defines through-traffic on Beach Drive as "non recreational."^v

The original roadways were designed to serve as safe, quiet and leisurely pleasure drives, not as crowded commuter lanes used simultaneously by automobile drivers, bicyclists and pedestrians.^{vi} Beach Drive was originally a dirt road, not paved until 1929. The alignment, placement and size of these scenic roads have not substantially changed since the 1920s, notwithstanding a substantial increase in vehicular and other traffic.

Given current usage, the NPS now warns trail users about the challenges of enjoying such iconic spots as Boulder Bridge where they must share the road with automobiles. While multi-use trails might allow greater and more diverse recreative experiences, this option would fundamentally destroy the scenery and violate the Olmsted's principal management guidance – justifying the NPS rejection of this option. Indeed, the 1902 McMillan Plan acknowledges the inherent tension of making park scenery "conveniently accessible to the people" in the face of growing demand: "We believe that as wide a road as the future population is likely to demand would injure the character of the valley irremediably." Given population growth and commuter usage, the Drive no longer functions as originally intended. Continued closure will therefore enhance recreational enjoyment. By identifying specific precincts for specific purposes, the management plan can aim to ensure safety, reduce collisions, and prevent distractions for a more restful experience. Such separation of ways will adapt the great park plan to 21st century opportunities – in keeping with Olmstedian design principles.^{vii}

Though anecdotal, People's Alliance for Rock Creek notes in its comments that the "closure to car traffic has actually enhanced" recreational use for those with physical limits, "including the elderly, young children and the disabled in areas they never would be able to enter during weekdays when cars are permitted on Beach Drive." Road closure has also provided recreational access to neighborhoods east of the Park which otherwise lacked paved access.

Continued closure can promote resiliency.

In their guidance, the Olmsted Brothers emphasized the important goal of fostering resiliency and park health. Renewing intensive commuter use is likely to undermine those goals by degrading air quality, creating noise and runoff and threatening wildlife. In its Resource Stewardship Strategy, the NPS has acknowledged that Beach Drive is "used extensively by commuters...[and] contributes to issues related to visitor safety, noise, air quality and habitat fragmentation." P. 20. While research is limited, a number of recent studies have shown that automobiles can contribute to the introduction of invasive species, a problem that increasingly plagues Rock Creek

Park. Eliminating automobiles in this area can help reduce these adverse impacts by creating a greenway and environmental corridor.

Of course, closing these sections of the road will not only end commuter traffic, but restrict the ability of other automobile drivers to visit the area. In keeping with the original intent, NPS should make available continuing opportunities for pleasure drives. Going forward, the NPS should open the roadway at least four times, annually, in all seasons, to provide this experience. As suggested by the Rock Creek Conservancy, NPS might also consider an alternative form of transportation – such as a tram – to provide access to portions of the park that are now auto-free.

Before any closure, we also ask that the NPS:

- Confirm and ensure that the closure to vehicular traffic in the upper reaches of Beach Drive does not preclude automobile access to major sites within the park, adjoining neighborhoods, and park amenities such as picnic tables. It is our understanding that nearly all of the picnic groves will remain accessible and the proposed closure will not impede vehicular access to major destinations within the park (i.e., nature center, Peirce Mill, Old Stone House, stables, Carter Barron).
- Develop maintenance and other practices to ensure natural restoration, trash pickup and proper and safe public enjoyment.
- Provide educational materials that introduce the varied landscape types in the Park (described by the Olmsted Brothers) and apprise visitors how and where they may be experienced;
- Continue current closure protocols which permit access to most of Beach Drive for cars transporting those with physical limitations;
- Undertake a data collection process to track the environmental impact of automobile closure in this section.
- Schedule a regular annual review process of the management plan to analyze both public use and natural restoration.

The National Association for Olmsted Parks is the only national organization dedicated to protecting and preserving the life, leadership and legacy of Frederick Law Olmsted. NAOP is serving as the Managing Partner of Olmsted 200, the celebration in 2022 of the bicentennial of Olmsted's birth, www.olmsted200.org. NAOP's Olmsted Network includes more than 70 friends groups and conservancies around the country dedicated to protecting Olmsted parks and landscapes including the Rock Creek Park Conservancy.

ⁱ The Report is available through the BiblioGov Project. Because it is a facsimile of the original report, it is often hard to decipher. Page 45 is missing altogether.

ⁱⁱ The NPS public meeting presentation did not address the environmental impact of reopening the road to automobile commuter traffic. NPS in turn announced that it would not consider climate change in its assessment of the environmental impacts. Given the Olmsted focus on resiliency and the enabling legislation's express goal of preserving the Park's "timber, animals, and curiosities ... in their natural condition, as nearly as possible," we believe these matters should be factored into the review process.

ⁱⁱⁱ To assist in achieving a balance of preservation and public visitation, the Olmsted Brothers divided the park into administrative divisions: Valley Section; Plateau Recreation Ground; Woodland for Intensive Use; Open Hillside; Wilder Woodland; and Meadow Park. The section of Beach Drive affected by this proposed closure is located in the Valley and Meadow Valley sections. There, the Olmsted Brothers recommended minimal intrusion. According to the report: The Valley Section should allow public use but only of small scale and incidental kind. In the Meadow Park, they invite "any use... which does not disturb the simple broad stretch of greensward." The Report also divides the park into "distinct conservation areas": natural forest, open woodland, bushy hilltop growth, and open grasslands.

^{iv} "When the Park was created, the roads were unpaved, the speed limit was 10 mph; 200,000 people lived in the District and 25,000 north in Montgomery County. Today, 700,000 people live in DC and 1 million live in Montgomery County." Comments by Gary Guzy, Rock Creek Conservancy Board Member at Town Hall hosted by Congresswoman Eleanor Holmes Norton, June 29, 2021.

^v The existing management plan was designed to facilitate rush hour through-traffic to minimize impact on adjoining streets. Final Management Plan. GM/EIS, Summary, pp. 6 and 14. We note that during the closure of the last 18 months, commuters have found alternative pathways downtown. DDOT meanwhile appears confident it can address any impacts should the road remain closed.

^{vi} The nomination form for placement of the Rock Creek Park Historic District on the National Register of Historic Places notes the following: "The existing parkway road system was largely adapted from the reuse of existing county roads or originally built as early twentieth century park carriage drives. All of the park's serpentine roads were designed as pleasure drives, which was a major recreational activity in the park before 1941. The present road system continues to reflect their original purpose of providing public access to the enjoyment of extraordinary rural scenery. Although adapted to the automobile, the designed alignment, width and environmental surroundings of these scenic roads has not substantially changed since the 1920s." National Register of Historic Places, Registration Form, Rock Creek Park Historic District, Sec. 7, page 2 (August 1991).

^{vii} We urge NPS to closely examine and monitor non-vehicular usage to ensure safe recreational enjoyment. Closure to vehicular traffic should not eliminate one hazard but accommodate others. There should be thoughtful separation of use to avoid collision or the apprehension of collision, between different kinds of use.