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*Park:* Rock Creek Park  
*Project:* Rehabilitation of the Rock Creek Park Golf Course  
*Document:* Rehabilitation of the Rock Creek Golf Course - EA

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*Comments:* Comments of the Olmsted Network on the Environmental Assessment for Rehabilitation of the Rock Creek Park Golf Course

On September 25, 2023, the National Park Service, in partnership with National Links Trust, Inc., released an Environmental Assessment (EA) assessing two options – 1) no change; and 2) major rehabilitation of the Rock Creek Park Golf Course. While an upgrade of the golf course is in order, the "all or nothing" analysis of this massive project makes it virtually impossible to ensure thoughtful improvements to this historic and natural asset.

As outlined below, the Olmsted Network respectfully requests that the NPS delay a decision in order to address key questions of management and maintenance in furtherance of the 1918 Olmsted Report.

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## Background

In 1918, after urging by the US Senate Park Commission, the Olmsted Brothers firm completed a "master plan" for Rock Creek Park – the 1918 Olmsted Report. [https://www.nps.gov/parkhistory/online\\_books/rocr/olmsted\\_brothers.pdf](https://www.nps.gov/parkhistory/online_books/rocr/olmsted_brothers.pdf). The plan was designed to create a long-term management framework that would preclude piecemeal modifications and that would ensure that park managers pursued only those changes that would ensure the integrity of the landscape and scenery.

The 1918 Report declared that 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" (Olmsted Report 1918:1). It divided the park into administrative divisions and landscape units to ensure preservation.

According to the report, the management process "involves an unending watchful struggle to neutralize destructive forces inevitably acting on the scenery.... The great problem of its management is to convert progressive deterioration into progressive restoration." The report expressly called for restrained development and the promotion of natural forest resilience. It was incumbent on managers to oppose intrusive structures and "inharmonious encroachments upon the simplicity, breadth, and restfulness inherent" in the landscape.

For more than 100 years, the Report has served as a guiding document.

While the Golf Course was not an original part of Rock Creek Park, records show that Frederick Law Olmsted Jr was aware of the course and approved of it in concept. In a letter written in 1943, Olmsted noted that the course was "quite in line with the landscape development recommended for the area in 1918." Rock Creek Park: Report of a visit by F.L. Olmsted." June 3 & 4, 1943 (Olmsted Associates Records: Job Files, 1863-1971; File 2837, Rock Creek Park, Washington, DC, 1918-1943 (Library of Congress), cited in Timothy Davis, NPS, The 1918 Olmsted Brothers Report: America's First National Park Master Plan.

After visiting the park and golf course, however, Olmsted also emphasized the importance of applying the management and maintenance guidelines set out in the 1918 report to ensure that the park's great natural beauty was not sacrificed.

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The proposed rehabilitation presents a massive set of changes involving major environmental and social impacts that will alter the natural qualities to be valued and protected. It is, therefore, imperative that additional options be explored, especially those that can reduce extensive canopy loss and fragmentation of fragile vegetation and wildlife habitat.

The EA should seriously evaluate an incremental approach: for example, 1) improving only nine holes; 2) eliminating the driving range altogether; 3) repurposing the existing buildings or reducing the proposed building size. In the case of the maintenance building, discretionary program changes are dictating tree removal. Are there alternatives which would minimize tree loss?

At the same time, the public deserves to understand: How does NPS justify the loss of 700 trees in the context of ongoing forest stewardship, so critical in a time of climate change? There is need for more detailed information (such as aerial photographs over time) regarding extant vegetation, age and placement of trees.

How will irrigation required for the Course impact the natural water features, creeks, seeps, and water table which support the park's overall vitality?

How will use of fertilizer and pesticide be contained so as not to affect the health of wildlife and other parts of the park? This great natural environment is already overstressed.

How will the safety of non-golfers be ensured who use and traverse the Course?

Important questions of maintenance must also be answered. This project requires a major upfront investment, followed by massive new stewardship requirements including the removal of invasives, the planting and care of meadows, and creation of new walks. Going forward, as the 1918 Olmsted Report makes clear, sustained maintenance will be required.

And yet there are no metrics when it comes to ensuring this care, nor any information regarding the consequences, if goals are not met. The sad reality is: the proposed rehabilitation is occasioned by chronic underfunding and deferred maintenance. How will the lessee be held accountable for these massive maintenance requirements in the future?

In the same vein, how will the lessee ensure that the park golf course remains affordable and accessible and "open to all." In too many places, proposed upgrades by private partners result in higher fees, less access, and tragic privatization of public assets.

While a Golf Course upgrade is needed, park users and taxpayers deserve assessment of alternative approaches that would minimize environmental impact on the overall park scenery and wildlife -- in keeping with the 1918 Olmsted Report. We respectfully request that no action be taken until these important matters are fully addressed.

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