

February 18, 2015

Superintendent
Rock Creek Park
Attn: Fort Totten-North Michigan Park Pedestrian Access Improvements EA
3545 Williamsburg Lane NW
Washington, DC 20008-1207

Dear Superintendent,

Casey Trees appreciates the opportunity to provide comment to the National Park Service (NPS) on the proposed project to preserve the natural features of Fort Totten Park and upgrade pedestrian access from the North Michigan Park neighborhood to the Fort Totten Metrorail Station.

Casey Trees strives to connect District residents with the many benefits trees provide. Trees make our neighborhoods more livable, enhance public health, and are a key element of making our city more sustainable as its population grows. Therefore, we recommend that NPS prioritize the preservation of this park's natural features and improve the park user's experience by building sidewalks around the perimeter of the park (Alternative 2) and creating an environmentally-friendly trail for pedestrians (Alternative 3).

Combining and improving proposals from these two alternatives would help minimize the project's impact on the park's canopy and improve accessibility and the overall experience for park users. Redirecting park users along the sidewalk and official trail would allow for the revegetation of the social paths that have contributed to recent environmental concerns outlined in the Environmental Assessment. Restoring these pathways with new trees and other vegetation will rollback years of neglect and help the city manage its stormwater, reduce the urban heat island effect, and provide habitats for wildlife.

Additionally, Alternatives 3 and 4 do not specify the extent of ground disturbance they would require to be implemented. We request that NPS provide estimates on the total number of trees that would be affected to facilitate the creation or addition of any pedestrian features and outline a comprehensive tree (and vegetation) replacement plan.



We also urge NPS to safeguard this park's tree canopy by:

- Prioritizing the protection of large, healthy and Special Trees (trees 55" in circumference of greater) when selecting trail alignments
- Using fencing to protect trees' critical root zone to prevent damage to trees that will be preserved during construction activities
- Replacing lost tree canopy by complying with the Urban Forest Preservation Act of 2002's tree replacement policy. While the Environmental Assessment says, "Any trees removed would be replaced at a 1:1 ratio," this statement needs further clarification
- Use pervious materials to construct the trail. Pervious surfaces help reduce stormwater runoff, replenish groundwater and lower the city's heat island effect.

Thank you for your time and for the opportunity to comment. If you have any questions, please feel free to contact me at ssazawal@caseytrees.org or 202.349.3472

Sincerely,

/s/ Suraj K. Sazawal

Suraj K. Sazawal
Advocacy Associate