



November 3, 2023

## Casey Trees Comments on Rock Creek Golf Course Rehabilitation Plan Environmental Assessment

Casey Trees is a DC-based nonprofit dedicated to restoring, enhancing, and protecting the District's tree canopy. To that end, we work with communities, developers, and District agencies to ensure that canopy is protected where it can be and to the greatest extent possible. We were surprised to be notified of this public comment period a week before it was originally set to close by members of the community; ordinarily, a project of this magnitude would be well known among our partners before the comment period even started. Receiving thorough community input requires enough notice for individuals and organizations alike to review. **We therefore ask NPS to extend the review period by 60 days to allow sufficient time for informed public comment.**

As a tree preservation organization, our primary concern is the 1,262 trees slated for removal. These trees represent nearly half of all the trees on the golf course and eight acres of forest cover. This comes at a time when the District is losing forest canopy and simultaneously feeling the ever-growing impacts of a changing climate. The District has an ambitious 40% tree canopy goal, but over the last monitoring period of 2015-2020 the city lost 1% — over 450 acres of canopy. This loss directly impacts our residents' health and our city's ability to adapt to changing climatic conditions such as excessive heat and effectively managing stormwater during increasingly powerful weather events.

### Tree Removal

The following numbers are provided in the Environmental Assessment: 2,571 trees were assessed as part of this project, and 1,262 (49%) are set to be removed. Of these 1,262, a total of 189 (15%) are listed as invasive trees. 366 trees (29%) are categorized as dead or dying and will be removed. We would like forests in DC to be as healthy as possible, and we support removing invasive species so native species can grow in their place. However, dying native trees still provide very valuable habitat within forests and should be kept where possible and where they do not present a safety hazard. The total number of invasive and dead or dying trees is 555 (44%) — less than half — of the total 1,262 trees.

**This means that 707 trees will be removed that are, to our knowledge, healthy native trees. The EA also states that of all the forest stands identified in the project area, Stand A, the largest and the healthiest stand, is also the area slated for the largest deforestation — 3.6 acres are slated for clearcutting and an additional 1.2 acres of selective cutting.** The EA characterizes Stand A as having "High species diversity, trees in good health, understory dominated by non-native invasive plant species."

The EA notes a Tree Inventory and Stand Delineation study commissioned in 2022, however that report has not been provided. We ask that the report be provided to the public for consideration, as the EA is absent of any details on the size and species of trees slated for removal. **Using satellite and inventory data from the District's Urban Forestry Division, we believe that over 200 of these trees are Heritage Trees under District law.**

While the plan notes one mitigation strategy in the form of planting 200 young trees, that is not a minimum 1:1 mitigation nor is it sufficient to replace mature forest with young saplings which simply do



not confer the same level of ecological benefits. We ask NPS and National Links Trust to reassess their metrics for tree removal and provide a redesign alternative that reduces the destruction of healthy and mature forest and provides a more robust mitigation strategy.

### **Invasive Plant Management**

Invasive plants are cited broadly as a reason for tree removal. In our experience, invasive plant spread can often be addressed with rehabilitation rather than removal. Rock Creek Park hosts a very dedicated volunteer base which leads invasive plant removal to free trees from afflictions such as English Ivy vines and to clear understory for young trees. This is not to say that they should be responsible for maintaining the golf course, but to emphasize that invasive plant management is part of *saving* trees, not removing them.

One major consideration of removing so many trees — especially in the densely forested areas — is that removal creates an even more favorable environment for the spread of invasive species. Forest cores are harder for these species to penetrate; slicing these forest patches up creates pathways for invasives to spread even farther. If trees are cut down for the sake of invasive management, the newly created and vulnerable forest edge zones creep further into the remaining forest and the problem will repeat itself without focused management.

The lack of invasive management created many of the existing problematic conditions, which may only be exacerbated under the proposed action. **The proposed action mentions an Invasive Plant Management Plan but provides little detail on the information and strategies such a plan would include.** We ask that NPS provide clarification on the Invasive Plant Management Plan, including, but not limited to, species prevalence and respective specific mitigation strategies, as well as other criteria consistent with the National Capital Region Invasive Plant Management Plan.

### **Wildlife Habitat**

The proposed plan will eliminate swathes of forest cover, including significant portions of the densest forest patches in the site area. This will have profound negative effects on ecosystem services like stormwater management and impact habitat cover for some of Rock Creek Park's most sensitive wildlife. Endangered species such as the Long Eared and Indiana Bats — whose populations have already been significantly harmed by the fungal white-nose syndrome — currently use these forests to roost and forage. Additionally, the Hay's Spring Amphipod, which is **only** found in Rock Creek Park, shares critical habitat with the golf course and relies on forest cover for stormwater treatment. These habitats — namely groundwater seeps and vernal pools — are highly sensitive to water quality pollution. Construction and replacing tree cover with impervious surfaces will have profound consequences for local water quality, both in the short and long term. All these endangered species — explicitly mentioned in the Environmental Assessment as direct victims of the proposed action — and many others will lose valuable habitat for breeding, foraging, and nesting. The acknowledgement of consequences but lack of mitigative measures in the proposed plan is cause for concern.

It appears that much of the reasoning used to justify these impacts is driven by the noted deterioration of the human experience of using the Rock Creek Golf Course and its limited offerings. We understand that the golf course is a recreational facility and therefore tailored for the user experience. However,



this particular golf course is part of a National Park and the largest natural area in the District. A strong and vibrant local ecosystem is part of the appeal. We support the addition of a pollinator meadow and a better trail system to allow guests the opportunity to enjoy the natural areas present in the site, but reducing the existing forest cover to what will functionally be scattered and isolated patches of individual trees is environmentally neglectful considering the services the existing forested areas provide.

For example, there are three proposed locations for the new maintenance facility. Among the proposed options is a redevelopment of the existing site, with very minimal environmental impacts. However, the preferred location used in the plan is also the only location that requires the removal of forest, so that the few remaining trees could “hide the facilities from golf course visitors.” This is not environmentally conscious planning; this is squarely putting environmental considerations as an afterthought to aesthetics.

Finally, we understand the jurisdictional boundaries between federal land and District land; the District has some of the strongest tree and green space protections in the country but projects like these circumvent those laws on ownership grounds. We would like to see NPS and other federal bodies act in good faith with our District agencies. **Our partners at the Urban Forestry Division and the District Department of Energy and Environment should be consulted and a good faith attempt should be made to comply with the District’s Urban Forest Preservation and Heritage Tree laws.**

### **Recommendations**

Given the major concerns that we have with how trees are being evaluated for removal, the lack of specifics in how vegetation will be managed after trees are removed, and the alarmingly short time frame that advocates had to review these plans, **we request that the National Park Service both extend the public comment period for this project a minimum of 60 days and re-evaluate the criteria used to determine tree removal for the proposed action.**

Further, we ask that NPS:

- Provide an additional Alternative Plan that minimizes tree removal and ecological impacts rather than the all-or-nothing alternatives presented in the EA,
- Clarify and enhance the tree planting mitigation plan to include details on size of trees to be planted and provide a minimum of 3 years of tree care and maintenance to ensure survival.
- Provide clarification on the Invasive Management Plan, including species prevalence, mitigation strategies, and other criteria consistent with the National Capital Region Invasive Plant Management Plan,
- Provide for public review the 2022 Tree Study and Stand Delineation report referenced in the EA, with details on size and species of trees to be removed,
- Formally consult with the District’s Department of Energy and Environment and Urban Forestry Division, and
- Respect and honor in good faith the District’s Urban Forest Preservation and Heritage Tree Laws.

Thank you for the opportunity to comment. We understand that rehabilitating the golf course is necessary but surely it can be accomplished without such adverse environmental impacts.