



Brian Joyner, Acting Superintendent
Rock Creek Park
Attn: Golf Course Rehab
3545 Williamsburg Lane NW
Washington, DC 20008

October 24, 2023 (updated October 26, 2023)

RE: November 4th is too soon. Please extend the comment deadline by no fewer than 60 days to allow us to thoroughly evaluate the proposed action.

Dear Superintendent Brian Joyner:

Last week, Casey Trees and many of our partners learned of the Rock Creek Golf Course Rehabilitation Environmental Assessment for the first time. Numerous community members, District agencies and local legislators were also unaware of this Assessment. This is highly unusual for a project of this magnitude; reviewing the Assessment and formulating comments that encompass the breadth of organizations and agencies impacted can take weeks. In this case, we only had one week before the public comment period closes to process these documents and evaluate their environmental impacts.

The environmental impacts described in the Environmental Assessment are cause for alarm. The proposed rehabilitation plan calls for – among many things – the removal of over 1,200 trees from the golf course, eliminating whole swathes of the largest and densest forested areas. This translates to losing 8 acres of forest cover and will adversely impact ecosystem services such as stormwater management and habitat cover for some of Rock Creek Park’s most sensitive residents.

In addition to the millions of visitors Rock Creek Park welcomes every year, the Park is home to a number of federally listed endangered species. Among them are multiple species of bats that roost and forage in the forest patches on the golf course, as well as the Hay’s Spring amphipod (that is **only** found in Rock Creek Park) which relies on water management and conveyance that the forest cover facilitates. These species will suffer the loss of habitat they rely on if this plan is implemented.

Additionally, invasive plant management is cited as a reason for removing many trees. Management can often be accomplished without removal; for example, a tree covered in English Ivy can very well be alive and simply in need of vine treatment. Removal of trees also creates avenues for invasive species to spread even further. Without a significantly expanded and focused management plan, the proposed action will exacerbate many of the existing issues that warranted rehabilitation in the first place.

Regarding the environmental impacts discussed here and the many others outlined in the Environmental Assessment, we feel that a much more thorough review of the proposed action is required. Casey Trees and our partners call upon the National Park Service to do the following:

- 1. Extend the comment deadline by no fewer than 60 days to allow us to thoroughly evaluate the proposed action,**
- 2. Consult with District agencies on the environmental impacts, and**
- 3. Re-evaluate the metrics used to assess environmental impacts, including tree removal, to better account for the health of the local ecosystem and the wildlife that call it home.**

At a time when the District is losing tree canopy while simultaneously feeling the ever-growing impacts of a changing climate, we should be prioritizing retention of our city's mature forests and natural ecosystems.

Respectfully,

Kelly Collins Choi Casey Trees	Chris Weiss DC Environmental Network
Max Broad DC Voters for Animals	Amanda Hurowitz Mighty Earth
Brenda Lee Richardson Anacostia Parks & Community Collaborative	Stella Tarnay Capital Nature
Nathan Harrington Ward 8 Woods Conservancy	April Linton City Wildlife
Cecily Kohler Capitol Hill Energy Co-Op	Sierra Club DC Chapter
Doron Petersan Sticky Fingers Sweets & Eats Sticky Fingers Diner	Peter Harnik Co-founder, People's Alliance for Rock Creek (PARC)
Nicole Whalen Green Compass, LLC	Joelle Novey Interfaith Power & Light (DC.MD.NoVA)
Naomi Cohen-Shields Chesapeake Climate Action Network	Linda VerNooy Citizens' Climate Lobby DC Chapter
Lydia Lawrence Nature Forward (formerly known as Audubon Naturalist Society)	Mary Pat Rowan, Delores Bushong, & Allison Clausen Langdon Park Forest Stewards
Trey Sherard Anacostia Riverkeeper	Christopher E. Williams Anacostia Watershed Society