

IN REPLY REFER TO:  
NCPC File No. 6999

**OCT 27 2009**

Mr. Faisal Hameed  
Program Manager  
Project Development and Environment  
District of Columbia Department of Transportation  
2000 14<sup>th</sup> Street, NW  
Washington, DC 20009

**RE: Comments on Proposed Klingle Valley Trail Environmental Assessment**

Dear Mr. Hameed:

Thank you for the opportunity to participate in the scoping of the proposed Klingle Valley Trail Environmental Assessment (EA), for a multi-use trail located adjacent to Rock Creek Park in northwest Washington, DC. The EA is being prepared, as a federal regulation requirement, on the currently closed portion of Klingle Road to evaluate alternatives for potentially opening the use of the previous road area to pedestrian and other recreational use. These scoping comments are limited to the Commission's role as the central planning agency for the federal government in the National Capital Region and express our general views on planning and environmental issues. However, it is important to note that the Commission continues to highlight to the District of Columbia Department of Transportation (DDOT) that all major DDOT projects within the District affecting federal interest must be reviewed by the National Capital Planning Commission.

With the above as background, the Commission staff's comment for scoping the federal EA document notes the following issues concerning the Klingle Valley area and in particular the earlier expressed position of the National Park Service of approximately six years ago, regarding the non-vehicular use of the valley area. The Commission staff reaffirms that position relative to the federal interest in Rock Creek Park, and the project's potential effects on this important resource.

Rock Creek Park is a 1,754-acre urban forest in the District of Columbia, is the oldest, largest natural urban park in the National Park System and is significant for its exceptional scenic beauty. Its natural forested landscapes stand in contrast to the surrounding cityscape of the District of Columbia. The park mission to preserve and perpetuate the ecological resources of

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Rock Creek valley in as natural condition as possible, and to preserve its scenic value for the enjoyment of the public, is grounded in the park's 1890 enabling legislation.

Rock Creek Park is made up of steep side slopes that bisect several significant east-west trending ridgelines and the Klinge Valley involves this type of significant and sensitive terrain. The valley, as a geographic entity, is an important watershed area to Rock Creek which supports the existing floodplain of Rock Creek Park. The Commission staff review of the previous Klinge Road feasibility study notes in the report's findings that portions of the existing valley terrain are within the 100-year floodplain as indicated by the Flood Insurance Rate Maps and Federal Emergency Management Agency (FEMA) Flood Data for Washington, D.C. For all of the proposed options for trail development, design standards and construction activities should be prepared and conducted to minimize potential harm to or within the floodplain. Previous increases in impervious surfaces within the drainage area have permanently altered the flows entering the system, thus affecting the drainage patterns. Those effects should be mitigated or reversed by any proposed trail and associated facilities. The introduction of sustainable landscape features, replacement tree canopy coverage, improved stormwater management practices, and increased green infrastructure to trail elements will be important attributes of any newly introduced trail. The Commission staff also emphasizes that federal requirements necessitate that the Federal Highway Administration (FHWA) must demonstrate in the developed EA, through an eight-step screening process, its compliance with Executive Order 11988 that prohibits federal agencies from funding construction in the 100-year floodplain unless there are no practicable options.

We want to underscore that the lands currently being considered for use in the proposal to establish a multi-use trail would impact Rock Creek Park. Rock Creek Park environs should be considered a unique and significant environmental resource. Additional note should be taken that NCPC staff stresses the removal of vegetation in any proposed trail design would not be supported by the Comprehensive Plan objectives of the Commission. We strongly request that assessment of land area be directed toward limited impervious pavement areas and that the most compatible form of access design of pedestrian surfaces and multi-use areas, if necessary, be determined in association with the National Park Service.

We appreciate your consideration of our comments at this stage of the project planning. The Commission staff requests, at this point, in conformance to the Commission's requirements regarding potential project reviews under its Environmental and Historic Preservation Policies and Procedures, that the National Capital Planning Commission be identified in the proposed EA as a federal cooperating agency, in conformance with the guidance issued by the President's Council on Environmental Quality. Additionally, please place the Commission on the distribution list pertaining to all project planning efforts, or at a minimum, coordinate such efforts with NCPC staff as early in the project development process as possible.

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Contact Mr. David Levy, Director of the Urban Design and Plan Review Division, to achieve this objective. If you have technical questions concerning the information related in this letter, you may contact Mr. Eugene Keller, at (202) 482-7251.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael A. Sherman", followed by a long horizontal line extending to the right.

Michael A. Sherman, Associate, AIA  
Director, Policy and Research Division

cc: Mr. John Wiser  
Greehorne & O'Mara