

CIVIL WAR DEFENSES OF WASHINGTON MANAGEMENT PLAN/ ENVIRONMENTAL ASSESSMENT AMENDMENT PUBLIC SCOPING REPORT

September 9, 2025

INTRODUCTION TO SCOPING PROCESS

Project Description

The National Park Service (NPS) is preparing an amendment to the 2004 Fort Circle Parks General Management Plan (GMP), which currently provides broad direction for the use, management, and development of the Fort Circle Parks. Since the 2004 GMP, “Fort Circle Parks” is now known as the Civil War Defenses of Washington (CWDW). The CWDW, built as a circle of fortifications on high ground to protect Washington, D.C. during the Civil War, evolved by the mid-20th century into federal parks for public recreation and reflection. Today, they form a historic greenbelt with prominent views of the city, blending cultural heritage with civic and environmental infrastructure. The proposed General Management Plan Amendment (Plan) will evaluate and update management zones parkwide, building upon and adjusting elements of the 2004 GMP to meet the current and future needs of the CWDW.

Following the scoping period, the NPS will prepare an Environmental Assessment (EA) analyzing the impact of the proposed Plan on the human and natural environment.

Purpose and Need

The purpose of the proposed action is to update the (CWDW) 2004 (GMP) to achieve the following:

- Review existing resource management zones to ensure that allowed uses are compatible with the protection of historic and natural resources.
- In areas where appropriate, carefully consider changes in the plan’s park zoning to allow for additional, compatible visitor use.
- Enable consistent application across the CWDW of appropriate visitor use based on each area’s park zoning.
- Define visitor capacity for the CWDW, based on the protection of historic and natural resources.

The CWDW GMP Amendment is needed to address the following concerns:

- The CWDW protects important natural and historic resources throughout its range.
- The city’s recreational needs are growing with an increasing population, and often the only land available for recreational use is within the CWDW.

- The existing GMP maintains open spaces throughout the CWDW. Organizations and individuals propose uses and improvements for these areas that are inconsistent with the CWDW's significance, frequently because the CWDW's importance and value are not readily apparent to the public.
- Many of the open spaces within the CWDW sites are isolated and lack connectivity with other CWDW areas and to community facilities and resources outside of the CWDW.
- Significant archeological and natural resources have been identified since the adoption of the existing GMP/EA. As a result, some archeological resources are located outside of cultural and natural resource park zoning designations.
- The existing GMP/EA does not adequately accommodate future planning, changes that have occurred since its adoption, or outline expectations for potential administrative tools to enhance park management, such as partnerships with civic associations, transfers of jurisdictions, or other mechanisms.
- The GMP/EA does not adequately address current activities that occur within the cultural resources of the site and do not diminish their value.

Scoping Period

The scoping period for the Plan began on March 26, 2025, and extended through May 9, 2025. Project materials posted on the NPS Planning, Environment, and Public Comment (PEPC) website included the virtual public scoping meeting presentation and a recording of the presentation. Written comments could be submitted via the PEPC website or mail.

DESCRIPTION OF SCOPING MEETING

A virtual public scoping meeting was held on March 26, 2025, to present proposed ideas for the Plan and to engage the public to identify issues, concerns, and ideas. The scoping meeting was held from 6:00 p.m. to 8:00 p.m. via Microsoft Teams. Approximately 25 attendees, including NPS and consultant representatives, participated in the virtual meeting.

The scoping meeting included a formal presentation given by NPS and consultant representatives followed by a discussion where meeting attendees were provided an opportunity to ask questions, provide feedback on the Plan, and share issues, concerns, and ideas. The presentation addressed the following:

- Project Background & CWDW History
- 2004 GMP Background
- NEPA Process
- Focus Areas + Site Analysis
- Proposed General Management Plan Amendment
- Questions & How to Comment

SUMMARY OF COMMENTS

Introduction

Thirty-three pieces of correspondence were received during the public scoping period. Thirty correspondences were received from residents of Washington, D.C. including the Ward 3 District of Columbia Councilmember; two residents of Camp Springs and Bethesda, Maryland; and one resident of Arlington, Virginia. The National Capital Planning Commission (NCPC) also provided input during the scoping period.

Comment analysis assists the planning team in organizing, clarifying, and addressing technical information relevant to the EA process. It also aids in identifying the topics and issues to be evaluated and considered throughout the planning process. The following summary of comments is provided to outline the major groupings of comments, along with examples of specific comments to illustrate the trend.

General statements that the comments included

1. Comments supporting the proposed Plan

Correspondences expressed support for the overall proposed Plan and/or for specific ideas presented in the proposed Plan, including the following:

- Updating management strategies to reflect current park uses and conditions
- Improving recreational access through additional trail connections and zone reassignments
- Increasing community involvement and collaboration with local organizations
- Preserving the unique character and historic value of the CWDW sites

2. Comments expressing concern with the proposed Plan

Correspondences expressed concern for the overall proposed Plan, including the following:

- Overuse of “site-sensitive” park zoning restricting public access
- Park zoning designations that do not reflect existing conditions or uses
- Insufficient infrastructure upgrades such as sidewalks, lighting, and clear pathways
- Lack of maintenance and invasive species control in natural park zones
- Limited responsiveness to local urban realities and community needs
- Lack of coordination with active volunteer groups and nonprofit organizations engaged in ongoing restoration and infrastructure efforts.

3. Comments requesting additional information about the proposed Plan.

Correspondences expressed interest in more information about the proposed Plan, including the following:

- Clarification of “Site Sensitive Recreation Zone” and its implications
- Incorporation and status of recommendations from the 2016 Paved Trails Study
- Outreach strategies and inclusion of public meetings in the EA phase
- Detailed park zoning maps and compatibility with active trail and recreation uses
- Coordination strategies with DC government and regional partners

4. Circulation

Many correspondences highlighted the importance of improving circulation and access between and within park sites. These suggestions focus on creating continuous and safe routes for biking, walking, and connecting with existing trails and neighborhoods. Commentors requested that maps more accurately reflect existing conditions. Comments included the following:

- “Formalizing existing social trails would aid residents who walk along the south side of Galloway Street NE up to the Fort Totten Metro Station.”
- “I support the proposed revisions of additional natural and connection corridor zones to Barnard Hill Park...It would great [sic] to add some additional access to the upper hiking loop area from the northern sides of the park, there are informal paths but access from further north on Eastern Avenue would be helpful.”
- “We also encourage the NPS to seek opportunities to prioritize multi-use trail projects for people who get around by biking, walking, rolling, or utilizing other micro-mobility devices, that will improve visitors' access to the Fort Circle Park sites.”
- “Of particular interest to the East Coast Greenway route in the region is a trail connection between Ft Totten and Barnard Hill Park...This route helps connect the MBT and the ART, a much wanted and needed trail connection in the region.”

5. Accessibility

Some comments addressed barriers to access for older adults, transit riders, and people with disabilities. There was an emphasis on improving trails, amenities, and field conditions to promote equitable access. Comments included the following:

- “People have to walk across a muddy or wet field to get to the bus.” (area east of South Dakota Avenue NE)
- “Many of us are senior citizens and can no longer attempt rigorous trails... have enjoyed some of the trail and fort remains in the past and would again do so in the future. So I encourage you to maintain and improve the remains and their connections.”
- “I would like to see a parking lot for seniors and handicap members of Ward Memorial AME Church.” (42nd Street NE)
- “One of the most important additions needed to increase access and equity within the CWDW is natural-surface hiking trails within Shepherd Parkway.”

6. Recreation and Park Amenities

Many respondents advocated for additional park amenities and enhancements that support passive and active recreation. Commenters identified Fort Mahan as a specific area for park amenities while others requested no additional amenities at the site. Comments emphasized the need for inclusive, family-friendly infrastructure. Commentors also noted support for new facilities placed in already built or turf areas but opposed new facilities in wooded areas. Similarly, commentors indicated the desire to convert underutilized turf fields to wooded areas. Comments included the following requests:

- Expanded recreation infrastructure such as playgrounds, playing fields, fitness stations, and walking trails
- Performance and cultural event spaces such as an amphitheater and bandshell
- Improved accessibility features like lighting, bicycle racks, and safe, well-lit walking trails
- Infrastructure including restrooms with hot and cold water, trash receptacles, and parking
- Enhanced views, including at 2nd Street SE, 2nd Street SW, and Fort Grebel, with well-placed retaining walls, signage, and vegetation management
- Increased availability of recreation space within the CWDW through collaborative efforts with the DC government

7. Safety and Lighting

Safety concerns were a recurring theme, particularly around lighting and security. Comments pointed to feelings of discomfort and specific incidents of harassment, urging improvements. Comments included the following:

- “In an effort to help deter crime in the park, more and better lighting would certainly be necessary.”
- “Basic security measures need to be added here to prevent the continued muggings from happening. No one feels safe in this park, especially at night, but people will always use it. It wouldn’t hurt to beautify this path, too.” (between Gallatin and Galloway Streets NE)
- “on a previous outing, we were harassed by some local youths, and the reason that we rarely include the Fort Circle Trail in our outings is discomfort. So please attend to safety as well.”
- “People are already biking, walking, and rolling to many of the civil war defense sites in the region; this plan should emphasize the safety needs of those currently using active transportation while also setting the stage to improve connectivity.”

8. Infrastructure and Environmental Management

Respondents emphasized the need to address both physical infrastructure challenges and environmental degradation across the park system. In addition to drainage, curbs, and waste

receptacles, comments highlighted concerns about illegal dumping, invasive species, topsoil erosion, and opportunities for ecological restoration through native plantings and partnerships. Commentors also requested that the natural character of areas be maintained. Comments included the following:

- “The section of Galloway Street NE between South Dakota Avenue NE and Sargent Street NE lacks proper curbing in several areas, resulting in significant water accumulation during rainfall. This presents a safety concern due to the risk of hydroplaning and reduced visibility. Installing curbs and/or incorporating stormwater management features such as rain gardens would be a valuable investment in the infrastructure and safety of this corridor.”
- “I would like to see a more environmentally friendly park, free of most of the litter and waste that currently covers a lot of the park. More waste containers to include recycle bins would most definitely help.”
- “Basic urban infrastructure, such as sidewalks is systematically lacking in this park.”
- “Dumping, invasive plants, topsoil erosion, and small forest fires are all issues I have witnessed personally in the currently designated “Connecting Corridor Zone” to the west of South Dakota Avenue, between Galloway and Gallatin Sts NE, to the east of Fort Totten Metro Station.”
- “In the amendment, the use of exotic plants should be limited, e.g. “primarily native plants.” Native plants generally provide more resources for wildlife, require fewer resource inputs, and are more tolerant to extreme weather.”
- “The amendment should incorporate a concept of providing resources for wildlife where practicable.”

9. Park Zoning and Land Use

Several correspondences expressed concern about park zoning designations that may limit park use or development. Respondents requested more flexible classifications that support both preservation and public recreation. Comments included the following:

- “in the Fort Totten plan, why not rezone the entire green space between South Dakota and 10th St NE as a recreational zone? The space is just a big empty field.”
- “The proposed Amendment would create a “Site Sensitive Recreation Zone” covering much of the park where there currently is a “Recreation Zone.”... But the term is not clearly defined in the materials and during the presentation and in discussions with NPS staff, it has been suggested that the import of the change would be to disallow any new ground-disturbing activities on the vast majority of Fort Reno.”
- “the NPS and District of Columbia Government should collaborate to ensure that while park resources are protected from commercial development, park zoning is not used as a tool to over-limit recreation and active uses of these parks where open space should be prioritized for the health and enjoyment of the general population.”

- “Recreational zones should be further described to specify whether they are intended as active or passive recreational zones.”
- “In many cases, natural resources that drive quality of life, like forests, sit on top of cultural resources like earthworks, so some zones should be updated to blend the two.”
- “Issues and Constraints...should include ‘Community Use and Recreation’ and Zoning and Management’ for every site listed...”
- “The NPS, working with the DC Government should retain the greatest flexibility possible to expand recreation uses.”

10. Historic Preservation and Interpretation

Multiple correspondences emphasized the value of preserving and interpreting the historical character of the parks, with suggestions for educational signage and protection of significant sites. Comments included the following:

- “It should be easy to locate a sign at every Circle Fort Park that provides key information, including their history and available public amenities, to create a more rewarding experience for all park visitors.”
- “We strongly support the creation of Site-Sensitive Recreation Zones around the remains of various earthworks. Cutting of invasive vegetation and the addition of signage and natural surface trails could make these historic sites accessible to spread the story of the CWDW.”
- “the updated CWDW management plan should address efforts to 1.) increase awareness of the sites and their historical significance...”
- “Through increased marketing, interpretive signage, and other passive and active recreation options, the Fort Circle Parks could become a more significant draw for visitors from the surrounding community and for visitors traveling to the Washington, DC area.”
- “We strongly disagree with any development of historic fortification sites, such as the earthworks themselves or the Fort Stevens National Battlefield, and we also advocate for including retaining views and protecting buried archaeological resources and forests associated with these sites.”
- “While the history of these sites is both interesting and culturally significant, they can and should be interpreted in ways that consolidate rather than expand the number and size of places used to tell the story of the war while maximizing the active uses for current and future residents.”

11. Governance and Coordination

Respondents emphasized the need for more structured collaboration to bridge informational gaps, better reflect urban realities, and align efforts across groups already engaged in stewardship and programming. Comments included the following:

- “We therefore urge NPS to enter into dialogue with DC government and nonprofit organizations with the goal of delegating management responsibility to local partners. NPS should take advantage of residents’ keen interest in these parks and welcome investment and participation from DC government and private resources to improve them. Outright transfer of jurisdiction to DC should be considered for areas that serve the recreational needs of neighborhood residents and lack true national significance.”
- “Creating a Community Park Advisory Board or regularly meeting with residents would help facilitate more opportunities for NPS to hear directly from residents on how to make these spaces more inviting.”
- “A better model would be to cede management of community garden spaces to the DPR Communal Farm network.”
- “I would encourage NPS to consider allowing UDC to expand its native plant nursery into areas of the park. Returning native species to the park area would help greatly with restoration efforts. Using some of this space adjacent to UDC could expand ecological research opportunities for students.”
- “When NPS releases the environmental assessment for public comment, NPS should conduct additional community outreach and hold another public meeting.”
- “I encourage NPS to develop a 311-like system where residents can request basic maintenance issues to be addressed, such as overflowing trash cans, fallen trees, or dumping.”

12. Governance and Coordination

NCPC reviewed the proposed Plan at its May 1, 2025 meeting. NCPC supported the Connecting Corridor Zone in Option 2 for Fort Dupont. NCPC also recommended that:

- The Management Plan include specific allowable uses in the Site Sensitive Recreation Zone to provide clarity for surrounding community members and visitors on the activities that are permitted, and to ensure consistent application across all parks in the CWDW.
- NPS consider developing and incorporating a process for periodic amendments to the management zones to address emerging needs and any significant archeological and natural resource discoveries.
- The Management Plan Amendment identify existing streets, sidewalks, and trails where it is possible to improve access and connections between the CWDW historic fort sites and surrounding communities. Future trail planning should aim to create a continuous, accessible and well-maintained trail network linking all the CWDW parks.

- Continued engagement occur with adjacent communities to understand and incorporate their recreation and facility needs into the planning process, communicate the CWDW's importance and value, and discuss the land management constraints and opportunities.
- The Management Plan Amendment incorporate a strategy to enhance visual and functional connections to the CWDW's visitor attractions, including well-designed and coordinated signage, pathways, parkways, streetscaping, wayfinding tools, and programming.
- NPS continue to actively partner with public and non-profit entities on programs which can enrich the visitor experience and provide educational services related to the CWDW's role as a national historic site and a community resource.
- The amendment include an invasive species management plan to remove invasive species and prevent overgrowth in the future.
- Careful consideration of impacts to cultural resources at Fort Reno with any future planning.
- The amendment identify strategies and areas within the ROCR East Focus Area to increase tree canopy cover while preserving any significant views and limiting impacts to archeological resources.
- Continued coordination occur with District agencies and local agencies in Maryland and Virginia with the development of the CWDW Management Plan to identify opportunities for shared recreation, open space preservation, and resource protection to address current and future needs.

The District of Columbia State Historic Preservation Office (SHPO) also reviewed the concept and provided the following comments:

- The Management Plan better describe allowable uses in the Site Sensitive Recreation Zone to provide clarity.
- Change use of “zoning” to “park zoning” to reduce confusion and conflation with the District’s zoning regulations.

Correspondence/Demographics Report

Project: CWDW Management Plan Update/Environmental Assessment

Project ID: 128306

Document: Public Scoping (Virtual Public Meeting)

Document ID: 143116

Correspondence ID: 1

Correspondence:

To whom it may concern: Thank you for the opportunity to provide input about Ft. Mahan Federal Park. Our church is located directly across the street, and I have witnessed severe neglect and maintenance avoidance of this cherished landscape. With proper care, this federal space can become more useful and valuable in cultivating a more livable and enjoyable community. Please consider the following as you develop the management plan for the properties that comprise the Civil War Defenses of Washington. Considerations Specifically for Ft. Mahan Park: Parking for park visitors Pavilions for picnics Cultural events (similar to events held on the mall downtown) Bicycle rack Grilling stations Lighting Amphitheater Trash Receptacles

Correspondence ID: 2

Correspondence:

I would like to see a more environmentally friendly park, free of most of the litter and waste that currently covers a lot of the park. More waste containers to include recycle bins would most definitely help. In an effort to help deter crime in the park, more and better lighting would certainly be necessary. To attract families to park, providing some parking and installing more barbecue pits would be a good move. If there is not one already in place, having a bandshell in the park would attract musicians and other artists for community-wide events.

Correspondence ID: 3

Correspondence:

I have been a lifelong resident of Ward 75 years. I have seen a lot of change. I know that change can be good and I can accept change. But I employ that you do not change the status of this park area Fort Mahan. More traffic of people more traffic of trash noise And other things that are to negative to mention. Therefore, please may it remain the same that people can enjoy it on occasion. right now people walk through it. They walk the dogs through it. It is just a nice area as

is. I begged this because as I said, I am aware of change changes is change, is inevitable, but it would be more pleasant to remain as a nature park. There are deer in there and other animals that would be runoff if we as people crowd their space with picnic tables and grills and more noise more trash, please please please do not change the face of this park.

Correspondence ID: 4

Correspondence:

I would like to see a parking lot for seniors and handicap members of Ward Memorial AME Church ; Also a safe playground for young children and their parents during the week days. There should be rest rooms with hot and cold water and plenty trash cans. The area should be well lit with a safe walking trail and benches. Beautiful trees, plants and grass along the trail. Thank You.

Correspondence ID: 5

Correspondence:

Would also like to see fitness stations and walking trails

Correspondence ID: 6

Correspondence:

Re: CWDW Management Plan Update/Environmental Assessment The "community path" or "desire path" (ie a path created by foot traffic/pedestrians) between Gallatin and Galloway (<https://maps.app.goo.gl/BfkkFDDcr6Z7AF2EA>) needs to part of this plan and I don't see it anywhere. As this path is used daily by neighborhood residents, it needs to be paved in a more permanent way and ample lighting put in. Basic security measures need to be added here to prevent the continued muggings from happening. No one feels safe in this park, especially at night, but people will always use it. It wouldn't hurt to beautify this path, too.

Correspondence ID: 7

Correspondence:

Greetings, I am very happy to see NPS updating the CWDW Management Plan throughout DC. As a Ward 5 resident, I am intimately familiar with the Fort Totten and Barnard Hill park corridors. Dumping, invasive plants, topsoil erosion, and small forest fires are all issues I have

witnessed personally in the currently designated "Connecting Corridor Zone" to the west of South Dakota Avenue, between Galloway and Gallatin Sts NE, to the east of Fort Totten Metro Station. Formalizing existing social trails would aid residents who walk along the south side of Galloway Street NE up to the Fort Totten Metro Station. Using permeable building materials could help mitigate current soil compaction and stormwater runoff. I would also encourage NPS to consider adding bioswales/rain gardens along the West side of South Dakota Avenue to aid in reducing impact of stormwater runoff. For the section of this corridor just south of the UDC campus, I would encourage NPS to consider allowing UDC to expand its native plant nursery into areas of the park. Returning native species to the park area would help greatly with restoration efforts. Using some of this space adjacent to UDC could expand ecological research opportunities for students. Finally, with regards to community garden spaces: community gardens are wonderful resources for those who receive plots, but many have a waitlist. A better model would be to cede management of community garden spaces to the DPR Communal Farm network. DPR Communal Farms grew and gave away 14k lbs of produce last year. Designating space for community members to grow food for each other greatly increases our ability to decrease food and nutrition security in the District. I would imagine that during the Civil War, some of these connecting green spaces were used for agricultural or supply chain purposes, and so growing food for residents could be in line with preserving this areas historical significance. I look forward to seeing how this plan comes together to protect these green spaces from development for generations to come.

Correspondence ID: 8

Correspondence:

The map on Page 42 shows the Metropolitan Branch Trail going east from Fort Circle Park. That's the interim trail. But DDOT has already built the permanent trail that goes north along 1st Place, Riggs, 1st Street to Blair. The map should be updated to match that.

Correspondence ID: 9

Correspondence:

The changes to the administrative plan fail to understand the many problems facing CWDW Parks. The entire plan treats the park as if it's in a rural area, which it is not. It is in the middle of a major city, surrounded by dense urban neighborhoods. Basic urban infrastructure, such as sidewalks is systematically lacking in this park. In fact, you can often tell when you get to NPS land because that is where the sidewalks end. Many of the parks serve instead to cut neighborhoods in half, and there is little to no effort to create connections across the parks. Take the section of park between Gallatin and Galloway Streets. There are no efforts in the old plan and none in the new plan to create links across what is essentially a field, despite a bus route on one side. People have to walk across a muddy or wet field to get to the bus. Surely a few paved walking paths would not ruin the park. Currently the parks act as walls, but with some thought,

they could just as easily knit the city together while still serving a park purpose. There are plenty of examples of this. Finally, just basic maintenance is sorely lacking. The areas marked as "natural" in the plans are essentially abandoned, completely covered in invasive species that are slowly strangling the forests. If you are not able to manage these urban forest, please find someone who can. The "natural area" by Fort Totten metro, and Riggs Rd is a disaster. The woods at Fort Slocum are a disaster as well. I'm sure community partners could help do cleanups, but few exist. The lack of consideration for the people of DC in the planning and management of this park appears typical. It seems NPS is either ill-equipped for or just doesn't care about effective urban park management. As such, it's not surprising so many people in DC so feel negatively toward the agency, as described in this article.

<https://www.politico.com/news/magazine/2024/03/22/national-parks-service-dc-neighborhood-parks-00148387> I hope there is a path toward improvement, and I'm happy to help develop ideas, but right now you don't even understand the problem.

Correspondence ID: 10

Correspondence:

Dear NPS, I am glad that you are thinking about the management of the CWDW. I belong to a regional group of hikers. Many of us are history buffs. Many of us are senior citizens and can no longer attempt rigorous trails like the Billy Goat but must limit our activities to tamer locations. The CWDW offer the attractions of both nature and history, and my companions have enjoyed some of the trail and fort remains in the past and would again do so in the future. So I encourage you to maintain and improve the remains and their connections. However, on a previous outing, we were harassed by some local youths, and the reason that we rarely include the Fort Circle Trail in our outings is discomfort. So please attend to safety as well. Thank you for your considerations.

Correspondence ID: 11

Correspondence:

I support the proposed revisions of additional natural and connection corridor zones to Barnard Hill Park. The park gets a lot of use from neighbors who enjoy the open space and natural features. It would great to add some additional access to the upper hiking loop area from the northern sides of the park, there are informal paths but access from further north on Eastern Avenue would be helpful.

Correspondence ID: 12

Correspondence:

Ward 8 Woods Conservancy is dedicated to increasing the health, beauty and public enjoyment of urban forests in Ward 8 and adjoining areas, many of which are part of CWDW. Through volunteer events and our Park Steward program, we have removed an estimated 206,000 pounds of trash from Fort Stanton and Fort Davis alone, and another 173,000 from Shepherd Parkway. We've also cut vines from at least 1,000 trees on CWDW lands. Ward 8 Woods supports updating the 2004 management plan to reflect current conditions and uses. We concur with the report's identified challenges, including illegal dumping, invasive species, unclear boundaries, and lack of connectivity. The report is also right to acknowledge that NPS lacks sufficient staffing and funding to address these challenges while, given the deteriorating political and economic situation, major new improvements are unlikely to be funded in the foreseeable future. We therefore urge NPS to enter into dialogue with DC government and nonprofit organizations with the goal of delegating management responsibility to local partners. NPS should take advantage of residents' keen interest in these parks and welcome investment and participation from DC government and private resources to improve them. Outright transfer of jurisdiction to DC should be considered for areas that serve the recreational needs of neighborhood residents and lack true national significance. Ward 8 Woods supports adding recreational facilities such as picnic tables, benches, playgrounds, and playing fields, but wants them confined to areas already covered in grass or pavement. We oppose the destruction of forests to make way for such facilities. This is a particular concern along Marion Barry Avenue at Ft. Stanton, where woods that come right up to the sidewalk on both sides must and should be preserved. We strongly support the creation of Site-Sensitive Recreation Zones around the remains of various earthworks. Cutting of invasive vegetation and the addition of signage and natural surface trails could make these historic sites accessible to spread the story of the CWDW. Partial restoration of the forts to their Civil War appearance, as at Ft Stevens, should also be considered in the long term. Ward 8 Woods also looks forward to the enhancement of existing viewpoints at 2nd Street SE, 2nd Street SW, and Ft. Grebel. Well placed retaining walls, signage and limited pruning of vegetation could make these into inviting overlooks. We are encouraged by the creation of a Recreational Zone at Parkland and a Special Use Zone by the Anacostia Community Museum. Both areas are heavily used as informal gathering places for residents and require this higher level of management and maintenance. One of the most important additions needed to increase access and equity within the CWDW is natural-surface hiking trails within Shepherd Parkway. Natural surface hiking trails have relatively low environmental impact and are comparatively inexpensive to build and maintain. This could function as a southern extension of the existing Fort Circle Hiker-Biker Trail that links Fort Mahan to Fort Stanton. The two segments could eventually connect through Suitland Parkway and the St. Elizabeths East Campus.

Correspondence ID: 13

Correspondence:

The Anacostia Parks & Community Collaborative (APACC) is a network of local organizations who come together to celebrate the Anacostia River and its park system. APACC believes the oversight and management of our city's parks is more effective when it's done in collaboration with the communities who live near and play in these spaces. We appreciate the opportunity to provide comment on the National Park Service's updated Management Plan for the Civil War

Defenses of Washington (CWDW). It has been nearly two decades since NPS conducted a Management Plan for the CWDW that marked different sections of the Circle Fort Parks into separate zones focusing on historic preservation, recreation, natural resource protection and visitor services. Since then, public and private partners have recognized that several Fort Circle Parks would benefit from new signage, adding outdoor recreation areas and improving connectivity with other community hubs, like recreation centers, that are located on these properties or in neighborhoods across the district. APACC's comments focus on the Fort Circle Parks located in Wards 7 and 8, such as Fort Dupont and Fort Stanton, but our recommendations are applicable to most greenspaces managed by NPS in all eight wards. Fort Greble, for example, was the southernmost Union fort within the district's boundaries, and along with Battery Carroll, its artillery was set to cover the Potomac River from a southern attack. But visitors to this scenic park today would learn little about that history because the site lacks a National Park Service information panel, and only has an entrance sign that reads, "Fort Greble/Fort Circle Parks." It should be easy to locate a sign at every Circle Fort Park that provides key information, including their history and available public amenities, to create a more rewarding experience for all park visitors. NPS has an important preservation-focused mission, but it can conflict with the demands of a densely populated city. This is most apparent at Circle Fort Park sites that have recreation centers that are managed by NPS, but lack basic amenities such as outdoor seating, lightning and other popular amenities commonly found at other district parks. The needs of residents who live near these parks should take precedence in decisions affecting them. Creating a Community Park Advisory Board or regularly meeting with residents would help facilitate more opportunities for NPS to hear directly from residents on how to make these spaces more inviting. Lastly, many of the Circle Fort Parks have large, open fields of grass that vary in condition from pristine to unkept. NPS can enhance these park spaces without significantly increasing their maintenance costs by focusing their resources on active recreation areas that benefit local neighborhoods instead of just maintaining large fields. Given budget constraints, converting portions of unused and unkept greenspace into low-maintenance forests will remove the need to regularly mow large grassy areas and help the city achieve its 40% tree canopy goal. Thank you.

Correspondence ID: 14

Correspondence:

I am writing on behalf of the East Coast Greenway Alliance and as a member of the Capital Trails Coalition to comment on the updated management plan for the Civil War Defenses of Washington. My primary comment for the updated plan is to continue to support and encourage the development and construction of multi-use trails between sites to better connect these incredible spaces. "A new trail to be developed to connect the historic earthworks and link most of the fort sites" has been in the plan and we would like to see this commitment strengthened in the new place, with an emphasis on connecting already constructed trails (like the Metropolitan Branch Trail/MBT and Anacostia Trail Network/ART). People are already biking, walking, and rolling to many of the civil war defense sites in the region; this plan should emphasize the safety needs of those currently using active transportation while also setting the stage to improve connectivity. Of particular interest to the East Coast Greenway route in the region is a trail

connection between Ft Totten and Barnard Hill Park. There is support from DC Ward 5 Councilmember Zachary Parker for such a connection, especially in light of the efforts on the Prince George's County to create a trail link from the Northwest Branch Trail and Chillum Community Park to Avondale Neighborhood Park; this project has received funding from a 2023 USDOT RAISE grant. This route helps connect the MBT and the ART, a much wanted and needed trail connection in the region. Many of these trail connections are highlighted in the Capital Space Big Idea document published by the National Capital Planning Commission: https://www.ncpc.gov/docs/CapitalSpace_Big_Idea_One.pdf The direct linked between the MBT and ART is also clearly shown on the Capital Trails Coalition map, with the section along the Ft Circle Park referred to as an (eastern) extension of the MBT: <https://gis.railstotrails.org/ctc/> Happy to discuss these trail proposals and find ways to collaborate so that the plan update includes the right language and maps to set the stage for trail development connecting civil war defense sites. Thanks, Elliott Caldwell

Correspondence ID: 15

Correspondence:

Galloway Street NE between South Dakota Ave NE and Sargent Street NE has no curb in many places between the street and the park. When it rains, frequently significant runoff pools in the road, which can be dangerous and cause hydroplaning for drivers. This area could really use either new curbs or, in the event drainage doesn't exist, stormwater rain gardens to help manage run off.

Correspondence ID: 16

Correspondence:

There's a serious drainage issue along Galloway Street NE, especially between South Dakota Ave NE and Sargent Street NE. The lack of curbs in several spots causes rainwater to collect on the road, creating large puddles that are hazardous for drivers. To improve safety and manage runoff more effectively, the city should consider installing curbs or implementing stormwater solutions like rain gardens where appropriate

Correspondence ID: 17

Correspondence:

The section of Galloway Street NE between South Dakota Avenue NE and Sargent Street NE lacks proper curbing in several areas, resulting in significant water accumulation during rainfall. This presents a safety concern due to the risk of hydroplaning and reduced visibility. Installing

curbs and/or incorporating stormwater management features such as rain gardens would be a valuable investment in the infrastructure and safety of this corridor.

Correspondence ID: 18

Correspondence:

Whenever it rains, water just pools up on Galloway Street NE between South Dakota and Sargent -- there aren't any curbs in a lot of spots, so the runoff has nowhere to go. It can get pretty bad and feels unsafe to drive through. It'd be great if the city could look into adding curbs or maybe even some rain gardens to help soak up the water.

Correspondence ID: 19

Correspondence:

This stretch of Galloway Street NE really needs attention. Without curbs between South Dakota Ave and Sargent Street, heavy rains cause serious pooling on the road. It's not just inconvenient - it's dangerous. Drivers are at risk of losing control, and the flooding is only going to get worse. Please consider installing proper drainage or green infrastructure like rain gardens to address this. This would also be an excellent park beautification.

Correspondence ID: 20

Correspondence:

I've lived near Galloway Street NE for years, and the stretch between South Dakota Avenue and Sargent Street has always had drainage problems. With no curbs along much of the road, rainwater just collects and sits there. It's not only an eyesore -- it's a real hazard for anyone driving through. We need better infrastructure here, whether it's curbs or rain gardens to deal with the water.

Correspondence ID: 21

Correspondence:

The lack of curbs along Galloway Street NE, particularly between South Dakota Ave and Sargent Street, contributes to poor stormwater management and runoff issues. Instead of just paving over the problem, this is a great opportunity to implement sustainable solutions like rain

gardens. These would both mitigate flooding and enhance the ecological value of the surrounding park space.

Correspondence ID: 22

Correspondence:

As a parent who often walks and drives in this neighborhood, I'm concerned about the way rainwater pools on Galloway Street NE between South Dakota and Sargent. Without curbs, water spreads across the road, making it slippery and hard to navigate safely -- especially with kids in the car or on foot. Curb improvements or green solutions like rain gardens would make a big difference.

Correspondence ID: 23

Correspondence:

The segment of Galloway Street NE between South Dakota Avenue and Sargent Street exhibits inadequate stormwater infrastructure. The absence of curbs along multiple sections contributes to uncontrolled surface runoff, which results in roadway ponding during moderate to heavy rainfall. This condition increases the risk of hydroplaning and accelerates pavement deterioration due to water infiltration. To improve hydrologic performance and vehicular safety, installation of continuous curbing and/or low-impact development (LID) features such as bioretention cells or rain gardens should be considered.

Correspondence ID: 24

Correspondence:

We are very excited for this zoning change. However, in the Fort Totten plan, why not rezone the entire green space between South Dakota and 10th St NE as a recreational zone? The space is just a big empty field. In the warm months, the space is mowed like once a month. It would be a perfect spot to develop a more structured community play area (soccer field, basketball court, play ground, etc.). I understand there are some metro access doors there, but let's extend the recreational zone all the way to the edge of these! We need a safe place for our kids to run around!

Correspondence ID: 25

Correspondence:

The plan update should support expanded bicycle use and paved trails in the park. The updated plan should enable the projects called for in NPS' 2016 Paved Trails Study, including an off-street alignment for the Metropolitan Branch Trail in Manor Park, the Fort Circle Park Trail through the Missouri Ave. Corridor, the Fort Circle Park Trail from Fort Totten to Avondale, and the Eastern Avenue Trail.

Correspondence ID: 26

Correspondence:

The plan update should support expanded bicycle use and paved trails in the park. The updated plan should enable the projects called for in NPS' 2016 Paved Trails Study, including an off-street alignment for the Metropolitan Branch Trail in Manor Park, the Fort Circle Park Trail through the Missouri Ave. Corridor, the Fort Circle Park Trail from Fort Totten to Avondale, and the Eastern Avenue Trail.

Correspondence ID: 27

Correspondence:

The plan update should support expanded bicycle use and paved trails in the park. The updated plan should enable the projects called for in NPS' 2016 Paved Trails Study, including an off-street alignment for the Metropolitan Branch Trail in Manor Park, the Fort Circle Park Trail through the Missouri Ave. Corridor, the Fort Circle Park Trail from Fort Totten to Avondale, and the Eastern Avenue Trail.

Correspondence ID: 28

Correspondence:

May 9, 2025 Ms. Tammy Stidham Associate Regional Director of Lands and Planning National Park Service 1100 Ohio Drive SW Washington, DC 20242 Dear Ms. Stidham: I write to submit formal comments on the proposed Civil War Defenses of Washington General Management Plan ("CWDW GMP") Amendment. The National Park Service ("NPS") suggests that a new plan is needed, in part, because: • The CWDW protects important natural and historic resources throughout its range. • The city's recreational needs are growing with an increasing population, and often the only land available for recreational use is within the CWDW. • The existing GMP maintains open spaces throughout the CWDW. Organizations and individuals propose uses and improvements for these areas that are inconsistent with the CWDW's significance, frequently because the CWDW's importance and value are not readily apparent to the public. These three points capture an inherent tension. NPS has an imperative to preserve and protect. It also

recognizes the fact of the community's acute recreational needs. In the context of that tension, NPS sometimes believes the local communities just don't understand. But we need a balanced approach in which NPS respects the needs of the community and the community respects NPS's needs. At least in Ward 3, I am concerned that the proposed CWDW GMP Amendment without clarification may fail to strike that balance which could and should create a framework for respectful cooperation. In a number of places, the proposed CWDW GMP Amendment suggests modest expansion to recreation zones in a tip of the hat to the District's recreation needs. I do not comment on the adequacy of those set asides which are outside of Ward 3. The Ward 3 site where there are proposed changes is Fort Reno, a site on which I have engaged with NPS for well over a decade. First, the good news. • The plan proposes a visitor center at the Chesapeake House site. Chesapeake House is being renovated based on a community - ANC - initiative. The visitor center - an NPS priority - would not have been possible without community partnership. • While it is not entirely clear from the presentation, it appears that the area set aside for a community garden may reflect an expansion off of existing conditions. If so, that is positive. If not, it should be expanded. • The proposal includes a trail on the west side of Alice Deal Middle School, apparently formalizing an informal trail that has been in use for years. The community has long wanted to see that trail formalized and the suggestion that NPS now agrees is welcome. Now for what is troubling. The proposed Amendment would create a "Site Sensitive Recreation Zone" covering much of the park where there currently is a "Recreation Zone." Hard to argue with being "site sensitive." But the term is not clearly defined in the materials and during the presentation and in discussions with NPS staff, it has been suggested that the import of the change would be to disallow any new ground-disturbing activities on the vast majority of Fort Reno. In other communications we have heard such a designation would allow the continuation of recreational use for many areas within the zone and opportunities to expand interpretation and education. The suggestion is that the site-sensitive recreation zone is proposed because of the known significant archeological resources and effectively to ensure that management of the site "does not impede management of cultural resource and natural values." I get it that we must respect the cultural history of the battleground and Reno City, indeed, those are high priorities for me and the community. I also understand the need to protect "natural values." But those guidelines could be used to severely limit activation. Indeed, the references to potentially prohibiting any "ground disturbing" activity suggest some may hold a very restrictive interpretation. Much can be done on the site while preserving the core of the archeological assets. For example, would placing a structure on a small area where there might be archeological assets below truly undermine management of the cultural resource? Would exposing some of the remnants of Reno City undermine or advance management of the cultural resource? And one person's "natural values" could be green space for the sake of green space when shaping some green space to accommodate a field would not adversely affect the overall feel of the space but could help meet a community need. Over the years, various stakeholders, including me, have proposed different ideas for the park, including the visitor center, expanded community garden and trail improvements apparently embraced in the proposed CWDW GMP Amendment. But other ideas have been on the table that are fully consistent with the history and overall need to preserve. Examples include a walking trail with exercise and historical interpretive materials, bringing to life historical references as is done in other historic areas such as St. Mary's, Maryland by, for example, exposing the foundation of a Reno City building and/or constructing an outline of a building that once existed, moving and expanding the stage and considering whether on the 33-acre site there might be space for a playground, a gazebo and/or

picnic area, an additional tennis court or playing field. Meanwhile, the maintenance of the existing fields has been a challenge. It could be important to undertake significant maintenance. That could not be done without "disturbing" the ground, but could be done without disturbing the cultural assets below. All of this could be done with an appropriate balance of values. But an unduly constrictive framework could foreclose them all. Such an approach meanwhile would represent a significant departure from the vision outlined in the National Capital Planning Commission's CapitalSpace Plan to which NPS was a significant contributor. That consensus report suggested: Residents and visitors will find within the Fort Circle Parks a myriad of opportunities for recreation, leisure, enjoyment of natural resources and wildlife, historical interpretation, and cultural education. Individual fort parks will have features that attract the interests of tourists, local historians, and Civil War enthusiasts. They will also provide much needed green space for activities and recreational opportunities for local residents, workers, and visitors. The vision of the CapitalSpace Plan can and should be achieved. Any CWDW GMP Amendment should facilitate, not stymie that vision. There is a straightforward way to fix this issue. Even if much of Fort Reno is designated as a "Site Sensitive Recreation Zone," that term should be clearly defined to allow for modifications that do not significantly undermine the history and cultural artifacts of the site. Not that there can be no disturbance but the site must be managed to overall to enhance management of the cultural assets. And, it should be clear that protecting natural values does not mean no change, but does mean the overall feel of openness should be preserved. And, NPS should be clear that it hopes and intends to work with the community to consider ideas for how Fort Reno can evolve to more fully serve the needs of the community consistent with its history and overall natural values. While the immediate issue is to ensure that the CWDW GMP Amendment does no harm through an unduly restrictive designation of much of Fort Reno, NPS should also be actively considering other ideas in the CapitalSpace Plan as it considers planning around the Fort Circle Parks such as the suggestion that: In the future, the Fort Circle Parks will be connected by a picturesque, lush Greenway that links Washington's neighborhoods with adjacent communities, the Anacostia riverfront, and diverse recreational opportunities, including an extensive regional trail system. explores the idea of increasing accessibility to the Parks by physically linking them to one another through the use of trails. The CWDW GMP Amendment touches on these ideas, but I would encourage an increased focus going forward. Of particular interest in Ward 3 is the section of Glover Archibold Park from Van Ness to Massachusetts though other areas of that park also merit consideration. The portion I reference has the new Upton Place and City Ridge communities and the longstanding McLean Gardens community on one side and the Department of Homeland Security ("DHS") site on the other. A day will come when the DHS site will be developed and when that day comes, consistent with the CapitalSpace Plan, we should have a strategy to link these communities and link the broader community to them. Let's work together to come up with plans for Fort Reno that can meet the needs of NPS and the community. Please use the CWDW GMP Amendment to make clear that NPS is receptive and indeed eager to engage in such an effort, in the process making clear that the "Site Sensitive Recreation Zone" designation is not intended to foreclose change, but rather is intended to ensure change is managed in a way that protects the heart of the sensitive cultural and natural assets at the park. Thank you for your time and attention to these matters. Sincerely, Councilmember Matthew Frumin, Ward 3 Chairperson, Committee on Human Services

Correspondence ID: 29

Correspondence:

As a 39 year resident of the District of Columbia I appreciate the opportunity to comment on the proposed updates to the Civil War Defenses of Washington 2004 General Management Plan update. Since 2004 the population of the District has grown by over 130,000 residents. As the scoping slides from your March 26th public meeting confirm, there has been little new recreation space provided in the District during this time, and much of the available land where recreation space to meet the health needs of residents is located in the CWDw parks that ring the city. It is with this reality in mind that I urge the NPS to maximize recreation space throughout this management plan and to work closely with the District of Columbia government to make more land within CWDW sites available for local recreation needs. While the history of these sites is both interesting and culturally significant, they can and should be interpreted in ways that consolidate rather than expand the number and size of places used to tell the story of the war while maximizing the active uses for current and future residents. In this spirit, slide 26 - Table 1: Overview of Issues and Constraints (Slide 26) should include "Community Use and Recreation" and "Zoning and Management" for every site listed in the table. The NPS, working with the DC Government should retain the greatest flexibility possible to expand recreation uses. In some instances within the scoping presentation there are alternatives that recommend replacing a "recreation zone" with a "site sensitive recreation zone." This should only be done where it enables the expansion of recreation activities to co-exist with cultural resources, and it should not have the effect of further restricting the ability of NPS and the District of Columbia government to maximize recreation activities in parts of the parks where they are already allowed by plan or zoning. Finally, in reference to zoning and management constraints identified in the scoping presentation, the NPS and District of Columbia Government should collaborate to ensure that while park resources are protected from commercial development, zoning is not used as a tool to over-limit recreation and active uses of these parks where open space should be prioritized for the health and enjoyment of the general population.

Correspondence ID: 30

Correspondence:

May 9, 2025 On behalf of the Washington Area Bicyclist Association (WABA), I am writing with recommendations for the National Park Service's (NPS) Civil War Defenses of Washington (CWDW) Update. For more than fifty years, WABA has worked to transform the capital region by improving conditions for people who bike, walk, and take transit. WABA works on behalf of our nearly 5,000 members and more than 20,000 supporters across the region. WABA also staffs the Capital Trails Coalition (CTC), a collaborative of public and private organizations, agencies, and volunteers working to advance completion of an interconnected network of multi-use trails for the Washington, DC metropolitan region. The NPS FOCI Management plan states that the purposes Fort Circle Parks are to - Preserve and interpret historical resources related to the Civil War defenses of Washington, - Conserve this linkage or urban green spaces that contribute to the character and scenic values of the nation's capital, and - Provide recreational opportunities compatible with historic and natural resource values. To achieve these goals, the updated

CWDW management plan should address efforts to 1.) increase awareness of the sites and their historical significance, and 2.) improve access to the Fort Circle Parks, especially for visitors traveling by walking, biking, rolling, or taking transit. **INCREASE AWARENESS AND INTERPRETATION** The Washington, DC metropolitan region is one of the most populous in the country and Washington, DC is one of the most visited cities in the United States. By raising awareness of the Civil War Defenses of Washington and the historic significance of the sites, there is an opportunity to increase visitor attendance and engagement. Through increased marketing, interpretive signage, and other passive and active recreation options, the Fort Circle Parks could become a more significant draw for visitors from the surrounding community and for visitors traveling to the Washington, DC area. Many regional residents and tourists are unaware of the existence and/or significance of the Fort Circle Parks and Civil War resources. By raising awareness of the CWDW and offering educational and recreational options at the park sites, we believe the Fort Circle Parks could increase their annual attendance and engagement rates. **IMPROVE ACCESS TO AND BETWEEN CWDW** The 2004 CWDW Management Plan set out to improve recreational opportunities and facilities: "Recreational opportunities and facilities will be improved. A new trail will be developed to connect the historic earthworks and link most of the fort sites. Brochures and interpretive signs will guide the way, enhancing visitor awareness of the historic importance of these cultural resources. Bicycle use will be limited" (Page iv). As noted in the outline for the updated management plan, the NPS acknowledges that the CWDW sites are isolated and lack connectivity with other CWDW areas, community facilities, and other resources. WABA believes that the CWDW would significantly benefit from improved access to and between park sites. We are supportive of the 2004 proposal to develop a trail to connect the historic earthworks and link fort sites; though we believe that this trail should cater to people riding bicycles and other micro-mobility devices. Because there are many historic Civil War resources located across the district, it would be a significant undertaking for visitors to traverse to many sites via trail on foot. Even the existing 7-mile long Fort Circle Hiker-Biker Trail is a long distance for many walking visitors to walk end-to-end. However, if visitors could traverse between more Fort Circle Park sites on a bicycle or other micro-mobility device via a low-stress route, especially a multi-use trail, the distance between sites would be easier and more appealing for visitors to take on. The construction of a multi-use trail would encourage more environmentally friendly transportation options to the park sites and would have a smaller construction impact. We further encourage the NPS to consider where there are opportunities to facilitate the use of public transportation to access Fort Circle Park sites for visitors. We believe the NPS will see increased attendance local residents and tourists interested in participating in bike rides (and for the users of other micro-mobility devices and transit) to and between the Fort Circle Parks, that would not be feasible for visitors traveling on foot. Though the 2004 proposed trail connecting historic earthworks and most of the fort sites was not achieved, we believe there continues to be merit in the proposal and encourage the NPS to continue to seek opportunities to optimize visitors' experience of the Fort Circle Parks and Civil War resources by improving access to and between sites. We also encourage the NPS to seek opportunities to prioritize multi-use trail projects for people who get around by biking, walking, rolling, or utilizing other micro-mobility devices, that will improve visitors' access to the Fort Circle Park sites. Several projects identified in the 2016 National Capital Region Paved Trails Study will improve multi-modal access to CWDW sites: **FORT CIRCLE PARK TRAIL - R1.3:** Develop an off-road trail facility from 16th St. NW to Fort Stevens Park, Fort Slocum Park and to Fort Totten Park with connection to Met Branch Trail. [note: would connect to Military Road

Trail] - R1.4: Develop an off-road trail from Fort Totten/Met. Branch Trail via Fort Circle Park to Avondale Park. [This project is also known as the Met Branch Trail Fort Totten to Avondale segment, the Gallatin Street, Connector Trail, or Prince George's County Connector.] - R3.2: Develop a local trailhead facility with connections to Fort Circle Park Trail and Met. Branch Trail. METROPOLITAN BRANCH TRAIL - R1.5: Develop an off-road connection to Met. Branch Trail from Bates Rd. NE to Kansas Ave. NW via Fort Totten Park. [aka Met Branch Trail Manor Park Off-Street Realignment] EASTERN AVENUE TRAIL - R1.6: Develop an off-road connector linking Fort Circle Park Trail and Northwest Branch Trail to proposed New York Ave. Trail. In closing, WABA enthusiastically encourages the NPS to seek opportunities to increase awareness of the CWDW sites and their historical significance, and improve access to and between the Fort Circle Parks, especially for visitors traveling by walking, biking, rolling, or taking transit. Sincerely, Kalli Krumpas Advocacy Director Washington Area Bicyclist Association

Correspondence ID: 31

Correspondence:

I live near Fort Totten and the Barnard Hill Park & Fort Totten Corridors. I frequently use the park area between South Dakota Ave. and Sargent Rd. NE for recreation, and have also visited Fort Slocum, Fort Totten, and Barnard Hill Park. I have used park sites for activities including hiking, snowshoeing, Easter egg hunts, and Halloween parties. I welcome greater use of these areas, while understanding the need to maintain limited uses of sites that have historical significance. Many parts of the park today are underutilized and underappreciated due to underinvestment and overly restrictive zoning. Overall, the proposed amendment should do more to invite public use of the park, and in particular the amendment should align with plans for paved trails in certain park areas. PURPOSE AND NEED Slide 18 states that a purpose of the amendment is to: "In areas where appropriate, carefully consider changes in the plan's zoning to allow for additional, compatible visitor use." I support amending the plan to allow for additional compatible visitor use. Slide 19 identifies that one of the needs for the amendment is: "The city's recreational needs are growing with an increasing population, and often the only land available for recreational use is within the CWDW." I agree that there are significant unmet recreational needs for communities near the park, and NPS should be part of the solution by adopting less restrictive zoning where appropriate. In addition, slide 19 states that another need for the amendment is: "Many of the open spaces within the CWDW sites are isolated and lack connectivity with other CWDW areas and to community facilities and resources outside of the CWDW." I agree with the need to improve connectivity within the park and to surrounding communities. PAVED TRAILS I am concerned that the draft amendment fails to take into account the Paved Trails Study that NPS completed in 2016. See <https://parkplanning.nps.gov/document.cfm?parkID=463&projectID=64643&documentID=74623>. The Paved Trails Study included several plans directly relevant to CWDW sites. However, the draft amendment makes no mention of the Paved Trails Study, and most of the proposed zoning apparently would not permit paved trails. I urge NPS instead to embrace the plans from the Paved Trails Study, which would significantly address the needs for greater connectivity and recreational amenities identified in this amendment. Pages 6-9 and 6-11 of the Paved Trails

Study include a map and descriptions of recommended actions related to the CWDW ROCR East sites, as follows: "R1.3 Fort Circle Park Trail - Develop an off-road trail facility from 16th St. NW to Fort Stevens Park, Fort Slocum Park and to Fort Totten Park with connection to Met Branch Trail. R1.4 Fort Circle Park Trail - Develop an off-road trail from Fort Totten/Met. Branch Trail via Fort Circle Park to Avondale Park. R1.5 Metropolitan Branch Trail - Develop an off-road connection to Met. Branch Trail from Bates Rd. NE to Kansas Ave. NW via Fort Totten Park. R1.6 Eastern Avenue Trail - Develop an off-road connector linking Fort Circle Park Trail and Northwest Branch Trail to proposed New York Ave. Trail. R3.2 Fort Circle Park Trail - Develop a local trailhead facility with connections to Fort Circle Park Trail and Met. Branch Trail." The GMP amendment should incorporate those Paved Trails Study recommendations. At the least, the GMP amendment should ensure that zones are not incompatible with the recommended trails. However, the current draft appears to be broadly incompatible with the Paved Trails Study recommendations. For instance, the current definition of Connecting Corridor Zone on slide 14 describes "(unpaved) trails." NPS should revise the GMP to generally allow for paved trails except in those few locations that contain sensitive cultural resources. Aligning the GMP with the Paved Trails Study is especially important because many of the actions recommended in the 2016 Paved Trails Study have developed further since 2016. For instance, the Paved Trails Study included this recommended action: "R5.1 Fort Circle Park Trail - Evaluate the feasibility of an of or off-road trail facility along Military Rd. NW from Glover Rd. NW to 16th St. NW." Subsequently, NPS undertook that feasibility study in 2022. See <https://parkplanning.nps.gov/projectHome.cfm?parkID=198&projectID=106387>. Following the feasibility study, the DC Council provided funding for the Military Road Trail project, and construction is anticipated to start between 2026 and 2027. See <https://trails.ddot.dc.gov/pages/military-road-trail>. The Military Road Trail would connect with Paved Trails Study recommendation R1.3 in the Missouri Ave. Corridor if both are constructed. Similarly, since 2016, the DC Government has constructed parts of Paved Trails Study recommendation R1.5, and other parts are under construction. However, the segment between Riggs Rd. and New Hampshire Ave. NE is being constructed on-street, despite the Paved Trails Study recommendation for an off-street trail and the availability of CWDW land where an off-street trail could be constructed. The projects recommended in NPS' Paved Trails Study have in turn been endorsed by the DC Council and the National Capital Region Transportation Planning Board in the National Capital Trail Network. See <https://national-capital-trail-network-mwcog.hub.arcgis.com/>. Advancing a GMP that impedes the development of paved trails would hinder the connectivity that this amendment seeks to improve. I urge NPS to address these issues in amending the GMP.

RECREATIONAL USES As described on slide 13, the current GMP is restrictive in its approach to bicycle use within the park. As discussed above, restricting bicycle use is contrary to meeting the identified needs for greater connectivity and recreational amenities. The GMP amendment should generally embrace bicycle use and bicycle facilities except where they would disturb sensitive sites of historic importance, which comprise only a small portion of CWDW lands.

ZONE DEFINITIONS As described on slides 14-16, the current GMP zones generally envision limited paved trails. The zones overall should be more permissive of paved trails except where they would disturb sensitive sites of historic importance. The Connecting Corridor Zone particularly should embrace paved trails. Additionally, the Connecting Corridor Zone definition envisions the use of exotic plants. In the amendment, the use of exotic plants should be limited, e.g. "primarily native plants." Native plants generally provide more resources for wildlife, require fewer resource inputs, and are more tolerant to

extreme weather. SITE-SPECIFIC RECOMMENDATIONS Slide 39 proposes zones for Fort Totten and the Barnard Hill Park & Fort Totten Corridors. I am concerned that some of these zones are overly restrictive and will impede the purposes and needs identified above. The area between New Hampshire Ave. and Riggs Rd. NE, west of the train tracks and east of 1st St., is proposed primarily as a Natural Zone, with a small Site-Sensitive Recreation Zone near 1st St. However, to my knowledge, there is no special natural resource in this area; there is only a small patch of second- or third-growth forest. This area should be rezoned as a Connecting Corridor Zone to enable additional uses (which would be compatible with preserving the forest patch to the extent possible). In particular, this area should be zoned to permit paved trails (see recommendation R1.5 in the Paved Trails Study, also called the Metropolitan Branch Trail Manor Park Off-Street Realignment). The area south of Galloway St. NE and immediately west of the train tracks is shown as a Natural Zone. However, this area already has been disturbed by the Fort Totten Metro station and the Metropolitan Branch Trail. If the Metro station and trail are no longer under NPS jurisdiction, those sites should not be shown as part of the park on the zoning map. Conversely, if the Metro station and trail remain under NPS jurisdiction, those sites should be rezoned, perhaps as Special Use Zone - at any rate, it is not a natural area. New Recreation Zones are proposed adjacent to South Dakota Ave. NE. I support this proposal. There is currently a ballfield backstop in this area, and this area would be well-suited to future recreational uses. The area between Galloway St. and Gallatin St. NE, between approximately 10th St. and Sargent Rd., is proposed to change from a Connecting Corridor Zone in the current plan to a mix of Natural Zone and Recreation Zone. I do not believe this change is warranted. To my knowledge, there is no special natural resource in this area that would justify treating it as a Natural Zone; there is only a small patch of second- or third-growth forest. In addition, this area appears to include an existing picnic area, which would seem incompatible with the proposed Natural Zone. This area should remain zoned as a Connecting Corridor Zone to enable additional uses (which would be compatible with preserving the forest patch to the extent possible). In particular, this area should be zoned to permit paved trails (see recommendation R1.4 in the Paved Trails Study). Next, with regard to the area proposed as a Recreation Zone, the open space in this area is compatible with the existing Connecting Corridor Zone. I think the area would be awkward for more intense recreational activities, being a relatively small open space surrounded by forest patches. (Note that there is currently a small paved area inside the park here, which should be removed at any rate, because it is too small and in too poor a condition to be useful for any purpose.) If there is a desire to provide additional Recreation Zone in this vicinity, it would make more sense to instead locate that east of Sargent Rd., which is entirely open space (and is currently proposed as Connecting Corridor Zone). The area east of Galloway St. and Eastern Ave. NE, between approximately 14th St. and 16th St., is proposed to change from Connecting Corridor Zone in the current plan to Natural Zone. I do not believe this change is warranted. To my knowledge, there is no special natural resource in this area that would justify treating it as a Natural Zone; there is only a small forest patch and heavily polluted stream. This area should remain zoned as a Connecting Corridor Zone to enable additional uses (which would be compatible with preserving the forest patch to the extent possible). In particular, this area should be zoned to permit paved trails (see recommendation R1.6 in the Paved Trails Study).

WILDLIFE RESOURCES The amendment should incorporate a concept of providing resources for wildlife where practicable. CWDW sites are some of the largest interconnected green spaces in the District of Columbia. This creates opportunities, for instance, for landscaping with pollinator-friendly plants, in order to support wildlife populations impacted by climate change

and other environmental stressors. MANAGEMENT Slides 25 and 26 state that illegal dumping is an issue in Fort Totten and the Barnard Hill Park & Fort Totten Corridors. I agree. I have observed illegal dumping in the parkland along Galloway St. between South Dakota Ave. and Sargent Rd. NE, especially near Sargent Rd. Inviting greater public use of the park, including through paved trails, will help deter illegal dumping. NPS also should take management actions to deter, promptly clear, and prosecute illegal dumping; leaving it on the ground just invites future dumping. NPS also should take management actions to address the contamination of Fort Totten Park with munitions and safely re-open all areas of the park. COMMUNITY OUTREACH There seems to have been little community outreach about the plan amendment process. When NPS releases the environmental assessment for public comment, NPS should conduct additional community outreach and hold another public meeting. Thank you for your consideration.

Correspondence ID: 32

Correspondence:

I live near Fort Totten Park and the Fort Totten Corridor. 1. I support the amendment of portions of the Fort Totten Corridor along Gallatin Street NE between South Dakota Avenue & Sargent Road NE to the Recreation Zone. This is consistent with the neighborhood's 2009 Riggs Road/South Dakota Avenue area development plan that was developed with input from stakeholders including the National Capital Planning Commission. I encourage NPS to maintain the Connecting Corridor Zone for the remainder of the park between South Dakota Avenue and Sargent Road where the proposed plan calls for a Natural Resource Zone. Keeping these areas as a Connecting Corridor Zone is more consistent with the parkland's current use by nearby residents and visitors.. 2. I encourage NPS to expressly address the discovery of unexploded ordnances in Fort Totten Park in the plan. The plan speaks to dumping in the park, but the discovery of unexploded ordnance deserves explicit articulation. In 2017, NPS notified residents that contaminated soil from Spring Valley was brought in to rehabilitate parkland following the construction of the Metro green line in the 1990s. Since then, unexploded ordnances have been found on both the west and east sides of the park. A plan for comprehensive testing and rehabilitation of the park is necessary. 3. As the plan notes, waste management is an issue at Fort Totten Park and along the Fort Totten Connecting Corridor. I encourage NPS to develop a 311-like system where residents can request basic maintenance issues to be addressed, such as overflowing trash cans, fallen trees, or dumping. Thank you for the opportunity to submit comments on the amended GMP.

Correspondence ID: 33

Correspondence:

2 page letter. Body copied below. Re: Comments For Proposed Civil War Defenses of Washington Updated Management Plan Dear Superintendent Joyner, Rock Creek Conservancy

is writing in response to the NPS request for comments regarding the Environmental Assessment for the proposed Civil War Defenses of Washington Updated Management Plan. The Rock Creek Conservancy (RCC) understands that DC's development of residential areas over the past 20 years has created greater demand for playgrounds and recreational facilities. RCC cautiously supports using green spaces that connect the Civil War fortifications. However, we urge development plans for these spaces to retain green, open space to benefit citizens and the environment. Parks are drivers of quality of life in DC. Green space provides ecosystem services, especially cooling to nearby neighborhoods, and provides passive recreational and quiet open spaces, promoting physical and mental well-being. DC has allowed significant development in Wards 4 and 5 without providing for the recreational amenities community members want. Future planning must address this and impose those requirements when new investments are made in the city. We strongly disagree with any development of historic fortification sites, such as the earthworks themselves or the Fort Stevens National Battlefield, and we also advocate for including retaining views and protecting buried archaeological resources and forests associated with these sites. Sites 2-8 listed in the Draft Management Plan are all in Rock Creek Park's portfolio. Further, RCC is directly involved in the following sites: • Site 3 is Fort Reno, where RCC hopes to occupy Chesapeake House and has invested in its repairs. • Site 5 is Ft Slocum, where RCC manages a mini oasis forest restoration demonstration site and plans to restore the rest of the forest. • Site 6 is Fort Totten, where RCC invests in significant forest restoration. We recommend that forest restoration at these sites be included in the preferred alternative. The zone designations in the plan suggest tension between different park priorities or that each location can only host one type of priority. In many cases, natural resources that drive quality of life, like forests, sit on top of cultural resources like earthworks, so some zones should be updated to blend the two. Recreational zones should be further described to specify whether they are intended as active or passive recreational zones. The two functions are very different in terms of how they serve surrounding communities and have very different impacts on park resources and the human and financial resources needed to manage visitors in those spaces. Having clear criteria for recreational spaces means more effective management (people are coming and doing things, so why not help them do so in ways that are more compatible with the sites). Following the model at Fort Reno, there may be potential for cooperative management with DC in some of the more active recreation areas. Thank you for allowing us to comment on this important management plan. If you have any questions, please contact us at xxxxxx. Sincerely, Tracy Bowen Interim Executive Director Rock Creek Conservancy

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APPLICANT'S REQUEST Approval of comments on concept master plan ACTION TAKEN
Approved comments on concept master plan Approves the following comments on the proposed concepts for amendments to the Management Plan for the Civil War Defenses of Washington (CWDW). Notes The updated CWDW Management Plan will designate management zones across four focus areas that broadly identify appropriate land uses and their applicable general locations. Future stages in park development include Development Concept Plans for major park

elements, project design of specific elements, and implementation. Supports the National Park Service (NPS) goal to balance the protection of cultural and natural resources within the CWDW with the provision of expanded community uses and improvements to the visitor experience. Management Zones Notes the 2004 Fort Circle Parks General Management Plan (GMP) identifies seven different management zones across the parks that define appropriate park uses and character. Notes the proposed amendment retains the existing management zone categories, and introduces two new zones to better serve surrounding neighborhoods: • The Community Garden Zones have been applied to the locations of existing community gardens. • The Site Sensitive Recreation Zones are intended to allow use for recreation that is not ground disturbing in areas with archeological resources. Finds the two new management zones will complement the existing zone categories and enhance the visitor experience by formalizing community uses within the CWDW parks and protecting cultural resources without prohibiting recreational use altogether. Recommends the Management Plan include specific allowable uses in the Site Sensitive Recreation Zone to provide clarity for surrounding community members and visitors on the activities that are permitted, and to ensure consistent application across all parks in the CWDW. Recommends NPS consider developing and incorporating a process for periodic amendments to the management zones to address emerging needs and any significant archeological and natural resource discoveries. Access and Trails Notes that access to and connections between the CWDW are limited because a continuous trail has not been implemented, and steep paths and unsafe conditions make it hard for pedestrians and cyclists to enter the parks. Recommends the Management Plan Amendment identify existing streets, sidewalks, and trails where it is possible to improve access and connections between the CWDW historic fort sites and surrounding communities. Future trail planning should aim to create a continuous, accessible and well-maintained trail network linking all the CWDW parks. Visitor and Community Use Recommends continued engagement with adjacent communities to understand and incorporate their recreation and facility needs into the planning process, communicate the CWDW's importance and value, and discuss the land management constraints and opportunities. Recommends the Management Plan Amendment incorporate a strategy to enhance visual and functional connections to the CWDW's visitor attractions, including well-designed and coordinated signage, pathways, parkways, streetscaping, wayfinding tools, and programming. Recommends NPS continue to actively partner with public and non-profit entities on programs which can enrich the visitor experience and provide educational services related to the CWDW's role as a national historic site and a community resource. Cultural Resources Notes significant archeological and natural resources have been identified since the adoption of the existing GMP. As a result, some of these newly identified archeological resources are located outside of the current plan's cultural and natural resource zoning designations. Supports efforts to protect recently discovered archeological and natural resources through revisions to the management zones to designate these areas as Cultural Resource, Natural, or Site Sensitive Recreation Zones. Notes many of the vistas from the forts are overgrown with vegetation and have been blocked by development over time. Supports the aim to protect or restore viewsheds that contribute to cultural landscapes and the aesthetic quality, historic significance, and visitor experience; and recommends continued evaluation of additional vistas that could be maintained or reestablished throughout the CWDW parks. Natural Resources Notes uncontrolled growth of invasive plants limits access to trails, recreation areas, and important cultural and natural resources. Recommends the amendment include an invasive species management plan to remove invasive species and prevent overgrowth in the future. Notes a portion of the CWDW land area is

within the 100-year floodplain and the 500-year floodplain and recommends preserving these floodplains and allowing uses where occasional flooding is acceptable, such as conservation and passive recreation, to help reduce risks of flooding in areas downstream. Focus Area Concepts Notes the CWDW Management Plan Amendment identifies four different focus areas with a total of 13 parks, forts, or parkway sites. The four focus areas geographically encircle the capital from west to east and include the George Washington Memorial Parkway (GWMP) and Rock Creek Park (ROCR) West; ROCR East; National Capital Parks-East (NACE) North; and NACE South. GWMP and ROCR West Notes the GWMP and ROCR West Focus Area includes Fort Marcy, Battery Kemble and Palisades Park, and Fort Reno. No management zone changes are proposed for Fort Marcy, Battery Kemble, and Palisades Park. Proposed management zone changes to Fort Reno include a new Site Sensitive Recreation Zone, as well as community and visitor use zones. Notes Significant archaeological resources connected to Reno City were identified at Fort Reno. Recommends careful consideration of impacts to cultural resources at Fort Reno with any future planning. ROCR East Notes the ROCR East Focus Area includes the Missouri Avenue Corridor, Fort Slocum, Fort Totten, the Barnard Hill and Fort Totten Corridors, and Barnard Hill. Most of this area is currently designated as connecting corridors and cultural resource management zones. The proposed changes include providing opportunities for recreation, formalizing community uses, and adding natural resource zoning. Notes the northeast portion of the District is identified as an area with less dense tree canopy cover; therefore, supports management zone changes to protect the character of wooded and densely vegetated areas in ROCR East. Recommends the amendment identify strategies and areas within the ROCR East Focus Area to increase tree canopy cover while preserving any significant views and limiting impacts to archeological resources. NACE North Notes the National Capital Parks-East (NACE) North Focus Area includes Fort Mahan, Fort Dupont, and Fort Stanton. This Focus Area currently includes primarily natural resource zoning, and the proposed management zone concepts expand recreation and community use areas to the extent possible and improve connectivity. Notes the Fort Dupont concept includes two options for proposed zoning. The zoning options are the same except Option 2 adds a Connecting Corridor Zone along Missouri Avenue, Massachusetts Avenue, Ridge Road, Fort Dupont Drive, and Fort Davis Drive SE. Supports the proposed Connecting Corridor Zone in Option 2 for Fort Dupont as the addition of this management zone will allow opportunities to increase multimodal connectivity and safety around and through the park, provided that adverse impacts to natural areas are avoided or minimized. NACE South Notes the NACE South Focus Area includes Shepherd Parkway and Fort Foote. Currently this area is primarily zoned for the protection of natural resources due to the dense vegetation and steep slopes. Proposed changes encourage opportunities for site sensitive recreation and enhanced connectivity to the surrounding neighborhoods. Notes the Commission approved site development plans in June 2024 for the Shepherd Parkway Parkland rehabilitation project which will improve the existing park site and offer residents of all ages a variety of amenities and recreational opportunities; and therefore, supports the change from Natural Zone to Recreation Zone proposed for Parkland. Partnerships and Coordination Recommends continued coordination with District agencies and local agencies in Maryland and Virginia with the development of the CWDW Management Plan to identify opportunities for shared recreation, open space preservation, and resource protection to address current and future needs. Encourages the use of a variety of management and maintenance strategies including partnerships, cooperative management agreements, or when appropriate, transfer of

administrative jurisdiction, to improve the CWDW parks and create a unified open space network. Meghan Hottel-Cox Secretary to the National Capital Planning Commission