



**ADVISORY NEIGHBORHOOD COMMISSION 3C**  
GOVERNMENT OF THE DISTRICT OF COLUMBIA  
*CATHEDRAL HEIGHTS • CLEVELAND PARK*  
*MASSACHUSETTS AVENUE HEIGHTS • MCLEAN GARDENS*  
*WOODLAND-NORMANSTONE • WOODLEY PARK*

Single Member District Commissioners  
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Ms. Melinda Bolling  
Director, Department of Consumer & Regulatory Affairs (DCRA)

Ms. Keith Anderson  
Acting Director, Department of General Services (DGS)

Mr. Delano Hunter  
Director, Department of Parks & Recreation (DPR)

Mr. Jeff Marootian  
District Department of Transportation (DDOT)

Mr. Tommy Wells  
Department of Energy & Environment (DOEE)

Re: Hearst Park Renovation and Pool Improvement Project

November 19, 2018

Dear Directors Bolling, Gillis, Hunter, Marootian, and Wells,

ANC 3C is writing to you today with regard to outstanding concerns related to the Hearst Park Renovation and Pool Improvement Project.

Environmental Impact

DOEE completed an environmental assessment of the project, informed in large part by the Environmental Impact Screening Form (EISF) completed by Cox Graae + Spack Architects, the contractors retained for the project. Upon review of the EISF by DPR, DGS and relevant contractors, members of the community identified over a dozen discrepancies and unaddressed issues between the form's responses and what has been presented to the community in either reports and/or community meetings. Among the issues of greatest concern are those which are focused on stormwater management, including the following:

- Section II. 17: DPR and DDOT conducted an evaluation of Park and Idaho Ave ROW existing stormwater facilities. As reported to the community, these facilities are inadequate to support the Park's existing storm water influx. Additionally, the facilities have not been maintained for years.
- Section III. 2: As briefed to the community on October 2, 2018, the property now will include two two-story buildings with elevators (a pool house and a utility building). It was unstated whether the second building, like the first, will be supported by piers due the site's location on landfill. Nothing in the EISF or the supporting documents assesses the impact of a second two-story building.
- Stormwater management and project compliance with the 2013 DC Stormwater Management Rule has been the focus of ANC 3F, ANC 3C, CPCA and community interest groups' resolutions and individual citizen appeals. To date, no stormwater management study has been presented to show that the project's planned bio-retention facilities and green roof will meet standards. The

description of the stormwater schema delivered as supporting documentation to the EISF is a single drawing (ref. D) paired with a narrative that includes incomplete language such as, “These BMP’s [stormwater Best Management Practices] will treat the building roof and landscape feature areas. The BMP’s will then tie into the existing Springland Lane N.W. separate storm system and eventually outfall into the XXXXXXXX...” Yet, as identified in EISF Discrepancy II. 17, DPR and DDOT’s analysis indicates that the current stormwater drainage path planned for use by the development is inadequate and not maintained. Other inaccuracies exist such as identifying that the separate sewage system for intended discharge flows into the Anacostia River [as presented, the discharge is planned to be into the Melvin Hazen Tributary of Rock Creek which flows into the Potomac River].

ANC 3C and the community have concerns associated with the fact that inaccurate or incomplete responses were used to make final determinations with respect to environmental impact. Given the proximity to both the Melvin Hazen Tributary and a significant number of properties already facing stormwater management issues, it is incumbent upon the District to ensure that work within the Park includes accurate and comprehensive analysis of potential environmental impact, stormwater management, and environmental and heritage tree preservation plans.

### Pedestrian Safety and Traffic Management

Surrounding Hearst Park – with a particular focus on Rodman, Idaho, Quebec, and 37<sup>th</sup> Streets – community members have identified existing pedestrian safety concerns including but not limited to needed crosswalks and repainting of existing crosswalks. Furthermore, elements of the EISF which touch on traffic and parking include discrepancies including:

- Section III. 6: The EISF reports that 55% of Park’s attendees will drive or carpool, yet DPR’s response to ANC 3C Resolution No. 2017-021 reported that Park users will “more than likely walk or bike to the site.”
- Section III. 7a: The response provided by contractors is inconsistent with the data provided in ref. B pg. 3. Further, peak hour data does not comprehensively represent recreational facility activity throughout the day during all four seasons. This flaw is common to both ref. B and the EISF. Finally, no parking study has been conducted.
- Section III. 10: No description was provided for the existing parking configuration. As noted above, no parking analysis was completed.

In order to ensure pedestrian safety in the area, it is imperative that studies be accurate and comprehensive both in completion and subsequent representation of content.

### Recommendations

In consideration of the most pressing issues at this time, ANC 3C requests the following:

- 1) **DGS, DPR, DDOE, and DCRA require contractors associated with the project to revise the EISF** to ensure accuracy within all responses. ANC 3C further requests that DDOE review the revised EISF and potential environmental impact associated with the project.
- 2) **DGS and DPR complete a comprehensive stormwater management plan and tree protection plan**, inclusive of protocol for enforcement to protect the Melvin Hazen Tributary.
- 3) **DDOT conduct a community meeting that includes all relevant agencies and community stakeholders** (e.g. neighbors, DPR, DDOT, representatives from Roadside Development and Donohoe Development, and members of the Hearst Elementary School, Sidwell Friends School, and Stoddert Soccer communities) in early December. The purpose of this meeting would be to address traffic and pedestrian safety issues around the periphery of the park in order to

comprehensively examine existing safety gaps and identify future pain points given the range of local development projects on the horizon.

This letter was considered at a noticed, public meeting of ANC 3C on November 19, 2018 where a quorum was present. The letter was approved by voice vote.

If you have any questions about this matter, please contact Commissioner Hersh, at [3C05@anc.dc.gov](mailto:3C05@anc.dc.gov).

Very sincerely,

Nancy MacWood  
Chair, ANC 3C09

Cc: Commissioners of ANC3C  
Mayor Muriel Bowser  
Councilmember Mary Cheh