



8 August 2018

Mr. Gregory O’Dell  
Events DC, President and CEO  
801 Mr. Vernon Place NW  
Washington D.C. 20001

Re: RFK Campus Redevelopment Plan

Dear Mr. O’Dell

We, the undersigned, appreciate the opportunity to provide comments on the current iteration of the RFK Campus Redevelopment Plan (hereafter the “Plan”). Like many in the community, we are excited that the Plan will provide outdoor recreation opportunities for an underserved part of the District. We are also pleased that the Plan calls for the removal of large areas of pavement and we commend the District for making this a priority. However, we find it unfortunate that the Plan does not explicitly address protection of the adjacent Anacostia River or the habitat and the wildlife that exist in the vicinity, all of which are of great benefit to the community. While we commend the addition of trees and a stormwater retention area in the current design for the playing fields, there is an opportunity for efforts to go farther: to enhance the area for birds and other wildlife.

Due to the size of the RFK Parking lot and its proximity to the river and Kingman and Heritage Islands, we see this redevelopment to be one of the greatest conservation opportunities in the District. As part of this Plan, we urge the District to go beyond adding playing fields and other more developed recreational space, and consider also creating high quality wildlife habitat (e.g. forest, meadow, wetland) to improve biodiversity value and invest in resilient natural infrastructure. This approach would be consistent with multiple plans that have been developed to guide land use considerations in the District:

1. The 2012 Sustainable DC Plan aims to “*protect and restore wetlands, waterways, and aquatic ecosystems*” and “*protect and expand tree cover*” among other goals.
2. The 2010 Anacostia Watershed Restoration Plan identifies “*wetland creation and restoration*” and “*riparian reforestation*” [riparian referring to vegetation adjacent to rivers and streams] among its eight restoration strategies. On page 8, this document further states the value of “*clustering complementary actions... to create the greatest benefits.*” The increased focus on restoration of

Kingman and Heritage Islands and the proximity to the National Arboretum and Kenilworth Aquatic Gardens support these enhanced benefits.

3. The 2003 Anacostia Waterfront Framework Plan lists “*restore riparian function*” among its goals, proposing a 200 foot wide riparian buffer along the river segment adjacent to the RFK Campus.
4. Chapter 4 of the 2015 District of Columbia [State] Wildlife Action Plan (SWAP) noted that “Development of recreational infrastructure and ongoing recreational activities in wildlife habitats are ... top threats to terrestrial vegetative habitats systems.” For recreational development adjacent to wildlife habitat we want to ensure protective measures (i.e. transitional vegetation buffers from fields to forested areas and meadows, protected areas for wildlife outside recreational zones) are considered. Chapter 6 identifies meadow and tidal wetland restoration as focal conservation actions, the latter including the RFK Campus site as one of six opportunity areas.

Given the above, it would seem logical that restoration of high-value riparian and wetland habitats would be a priority for this and any other proposed project along the Anacostia River.

We have concerns about other elements of the Plan. In particular, we find the abundance of new bridges to Kingman and Heritage Islands concerning. The amount of habitat disturbance and fragmentation required to build these bridges would likely be high, and the resulting increase in human presence could negatively affect wildlife. Recreation in protected areas can have positive effects on some species, but on balance this kind of activity tends to be a detriment. Further, these bridges are not included in the City’s parallel plans for the islands. In the time since Events DC released plans for these bridges, portions of the islands have been designated as State Conservation and Critical Wildlife Areas, and they are collectively designated a Conservation Opportunity Area in the SWAP. Given the preceding, we request that Events DC remove the new bridges from the current plan and coordinate with stakeholders to discuss whether there is a need for new pedestrian bridges and create a plan to minimize disturbance to habitat if plans to build additional bridges are pursued.

Recognizing that the current Plan has been under development for some time, we ask that consideration be given to the risks and opportunities that this project presents for birds and other wildlife. Specifically, we ask that the following recommendations and guiding design principles be considered:

- Provide and enhance the widest possible forested riparian buffer, in as unbroken a strip as possible;
- Site community fields and other infrastructure as far as possible from the river;
- Assess the feasibility of restoring wetlands in portions of the site;
- Establish bird- and pollinator-friendly meadows in unforested portions of the site;
- Minimize the addition of new lighting, follow International Dark-Sky Association guidelines for any lighting added, and leave lights off to every possible extent during songbird migration (consider also following proposed bird-friendly measures in the District’s Green Building Code update);
- Throughout the RFK campus, protect healthy mature trees and plant new trees with high habitat value (e.g. in rain gardens) to achieve the 30% tree canopy target previously recommended by Casey Trees;
- Use live grass instead of artificial turf; and
- Recognize the plans for Kingman and Heritage Islands and the importance of recent conservation designations on these islands by removing the new bridges to these properties from the Plan.

We would also like assurance that a thorough assessment of project impacts to wildlife and habitat will be conducted, including those impacts associated with additional disturbance on and near Kingman and Heritage Islands.

We offer ourselves as a resource in planning this exciting project and look forward to working with you. Thank you for your consideration and a chance to speak on behalf of our supporters.

Sincerely,

Zach Slavin  
President  
DC Audubon Society

Jim Foster  
President / Chief Executive Officer  
Anacostia Watershed Society

Mark Buscaino  
Executive Director  
Casey Trees

Suzanne Kelly  
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