



May 27, 2022

To: Planning Board Chair Anderson and Planning Board Commissioners

From: Neighbors of the Northwest Branch of the Anacostia River

Subject: Wheaton Regional Park Master Plan Update

Neighbors of the Northwest Branch is a local, community-based action organizationⁱ with over 200 members and supporters in Montgomery and Prince George's counties dedicated to restoring the health of the Northwest Branch of the Anacostia River so that this urban treasure can be safely enjoyed by wildlife, our families, and generations to come.

The proposed master plan update for Wheaton Regional Park is a treasure trove of historical information about the park, an impressive work of community engagement,ⁱⁱ and for the active sports components, indeed transformational. We applaud the effort to provide recreational opportunities for the diverse community immediately surrounding it and for the region--and for providing opportunities for people to arrive without a car.ⁱⁱⁱ

Our concerns about the plan deal essentially with natural resource conservation. This park's biodiversity area, valiantly protected by Parks staff, is an extremely important feature of the park, made all the more important as our climate warms. We concur completely with the statement on p. 68:

The conservation and management of the natural resources in Wheaton Regional Park must be prioritized to maintain the human and environmental benefits that they are currently providing. Environmental restoration should be implemented to strengthen climate resilience within the community and improve the ecological function of the park into the future.

We are also mindful that other areas, not specifically designated for conservation, also drain to the Northwest Branch, affect our climate footprint, and can pollute the biodiversity areas. We are therefore concerned about pavement where it can be avoided, management of the runoff where additional concrete is unavoidable, avoidable forest intrusion by trails and light, loss of trees, and other resource conservation. Our bulleted recommendations follow, with further explanations keyed to the master plan. We urge you to consider these caveats before advancing to implementation.

SUMMARY OF NNWB RECOMMENDATIONS

I. Paved Trails

- Remove from the plan paving from Stubbs barn to Brookside Gardens Visitors Center driveway.
- Move the Stubbs barn paved link trail from the newly planted slope to the clear flat area above, which avoids an ADA grading issue as well as an environmental one.
- On the west side of Pine Lake install a boardwalk instead of paving.
- Do not widen the paved Wheaton Regional Trail when renovating it and take extra special care within the biodiversity area.
- Remove from the plan any paved trail from Brookside Nature Center to Brookside Gardens.

II. Natural Surface Trails

- Move the proposed beginner mountain bike skills area from the wooded slope to the already open area where the house was removed. Post sign: Do not use when wet.
- Continue to designate the bridle loop for horses and foot traffic only, for safety of riders. No bikes.
- Install boardwalk on the east side of Pine Lake with a bridge over the creek rather than trying in vain to keep people out of this area.
- To minimize forest fragmentation, site the new Pine Lake trail (east side) along the existing trail up on the hillside above the lake. Build a bridge over the gully.

III. Light Pollution

- Forego lighting at the new Pine Lake entrance plaza to Brookside Gardens.
- Move the dog park to the athletic area to respond to those who want it lighted.
- In the athletic areas intended to be lighted, ensure that lights and fixtures are dark sky certified.

IV. Rubini Complex

1. Provide massive green infrastructure stormwater management for the massive replacement of grass with concrete for the Adventure Sports Park, including trees to shade the hangout areas.
2. Plant at least 4 acres of trees to offset the planned conversion of 4 acres plus of woods to 2 rectangular athletic fields and a parking lot.
3. Ensure that the new fields are grass, not artificial turf.
4. Plan green stormwater facilities for the new fields and parking lots (not mentioned in the report). For example, provide for corridors of trees in the parking lots.

V. Conservation

1. Create a plan to address nonnative invasive plants throughout the park using only bio/organic compliant herbicides where direct removal is impossible.
2. Create a plan to reduce runoff velocity throughout the park to reduce further degradation of park streams and the need for stream remediation.

RECOMMENDATION DETAILS KEYED TO PLAN DRAFT

I. Paved trails

While sensitive to the desire of some to be able to ride up, down, around, and through the park on paved trails, we know it comes at a cost to our water quality and resources. We feel that most of the goals can be achieved with less damage to them.

A1. The proposed paved trail on the current gravel road from the Shorefield entrance should go no farther than the barn, not on down to Glenallan Ave. (The immediate plan appears to be to pave just to the existing security fence around the house and barn.) An existing paved route from the Shorefield area to Brookside Gardens is via the upper parking lot and down the paved path to the entrance with a proposed new plaza at the Pine Lake end of Brookside. There is no need to cut through forest and the steep slope down to Glenallan Ave. At the Visitors Center end of the proposed paved route, the Glenallan Tributary runs very close to the road, so access there would likely need to be on the slope side, which would mean cutting into the hillside and constructing a retaining wall.

In addition, the map on p. 21 shows a paved trail from approximately the Stubbs barn down to the paved trail linking Pine Lake to the playground (no number). The map on p. 42 shows this as a serpentine trail (SB 3) down the recently replanted slope. We urge you to **instead make this connection across the flat open area.** The trail would go from the proposed paved gravel road to behind the adult exercise area. Cyclists, wheelchair users, and strollers would then simply use the existing ADA compliant paved trail down to Pine Lake and Brookside Gardens.

A5. We urge you not to pave the west side of Pine Lake. Yes, it gets muddy in heavy rain, especially the spillway area. That is what it's for, after all. A boardwalk would be much preferable. In fact, PL1 (p. 38) suggests a boardwalk. Note that while the text says pavement only TO Pine Lake, the map shows pavement joining the paved trail atop the dam. The argument for pavement of the gravel road is erosion ruts, but pavement just moves the problem to the side. Pavement will require companion erosion controls.

A6. The proposed paved trail renovations throughout the park should not include widening. More asphalt over tree roots means more dead trees, even if not actually chopped down for construction. **Special care must of course be taken of renovations of the paved Wheaton loop trail within the biodiversity conservation area, which should not have pavement in the first place.**

A7. A paved trail from the Brookside Nature Center to Brookside Gardens is totally unnecessary and destructive. The current boardwalk is consistent with the missions of both parts of the park. Those wishing to ride bikes on pavement from one to the other have only to exit to Glenallan Ave. and use the paved trail along Glenallan Ave. proposed in A8. Be it noted that riding a bike WITHIN Brookside is not allowed and thus should not be encouraged. The gardens have enough problems already with people not following rules; they do not need yet another open access point.

II. Natural surface trails

B14. Of primary concern is the plan to open the woods adjacent to the playground for a bike skills loop with a viewing platform (p. 23). This trail is mentioned again in the safety section, where clearing the forest floor and trimming to 3' is recommended (p. 71). Have there been incidents? Nature trail and nature play area are mentioned as well for these woods. This area is a steep slope prime to erosion. Parks has much experience with erosion here in its failed attempts to restore the former service road area. These plans would certainly amplify erosion problems as well as impinging on the train experience, given the train loop just below. The beginner mountain bike loop with its viewing platform could be constructed in the area where the house used to be, with all the bumps, dips, leaps, and viewing platform one could want. For survival of the trail, it should have signage forbidding use after heavy rain.

We are very pleased that the proposal to redesign the existing equestrian loop for a mountain bike track is no longer in the plan; however, **even allowing bikes on this trail at all poses a threat to horseback riders, as was eloquently described at the 5/19 hearing.** NNWB wants to ensure the watershed can be safely enjoyed by all users, with special consideration for those who are differently abled. As horses can become startled by bikes, allowing mountain bikes on the trail would make it unsafe for individuals with development disabilities who ride horses there as therapy, and even for more experienced riders. This is the only remaining trail for them to use, since the trails along the NWB are no longer safe because of the bicycles.

The proposed alternative track around the stable, which may again require tree removal, will likely not suffice for giving the developmentally disabled children the riding experience most beneficial to them. The mountain cyclists at the hearing seemed unaware of the new mountain bike trails opened recently downstream from Burnt Mills along the Northwest Branch. These new trails, cut up and down into the hillside, have banked curves for greater speed. They provide a relatively close alternative for mountain bikers.

B2 (p. 22) and C13 (p. 27). Instead of cutting an all-new trail partway up the hill on the east side of Pine Lake to avoid the mud, use as much of the existing people's choice trail as possible. A bridge will be needed across the gully (not mentioned in the report). However, the idea that use of the people's choice trails at lakeside could be curtailed is wishful thinking. People want to be near the water. This fact appears to be understood in C13 (SE side of the lake) and PL1 (other side) with suggestions of a **board walk and floating dock.** We concur with the boardwalk, which would bridge the stream. (Interestingly, the stream has created itself a delta.)

III. Lighting

C1. (p. 27), PL2 (p. 38). The welcome plaza proposed at the Brookside Gardens gate could be a nice addition if constructed with pervious pavers, which might mitigate the existing erosion problem at the site. Much of the site is currently pavement. **We do strongly object, however, to lighting in what should be a natural area and not open to the public at night anyway (p. 72, Implementation).**

RC 11 (p. 46), (p. 72). The current dog park is located on the edge of the biodiversity area. Lights there are unacceptable. The simple solution is *to move the dog park, with its recommended expansion to separate dogs by size, to a centrally located and thoroughly lit portion of the athletic complex.* At the Planning Board presentation, the point was made that one model for the Adventure Sports Park complex that included a skate park and bump track occupied just 1 acre of the 6 acres available. There should be plenty of space for a dog park. The current site could then be restored as a protective edge to the biodiversity section of the park.

All park lighting should be dark sky certified.

IV. Rubini Athletic Complex with transformative Adventure Sports Park

RC1 (p. 47). The Adventure Sports Park would convert 3 baseball diamonds currently on grass to acres of concrete, with consequences for heat island and storm water runoff. RC3 does mention stormwater management, but is silent on size or details. Use green infrastructure, carefully planned and sized at the outset to handle runoff from the sports park and the increased parking area.

RC4 and 6 (p. 46). New soccer fields and parking lots replacing woods^{iv} and a grassy area are clearly inconsistent with making environmental protection a priority. Further, no stormwater management facilities are mentioned in connection with these new fields and parking lots. We recognize the need for more soccer fields, but urge that green infrastructure stormwater management facilities be included in the planning, that **the new fields be grass, not artificial turf**, and that **4 acres of replacement trees be planted elsewhere in the park to partially compensate for the tree loss.** (Two fields equal 172,800 square feet, or 3.97 acres. This does not include the new parking lot, for which no dimensions were given.)

Plant trees to shade the planned hangout areas and to aid in stormwater runoff management from the new fields, the Adventure Sports Park, and the parking lots.

V. Conservation

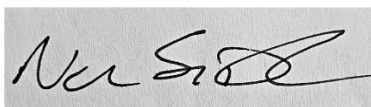
Create a plan to reduce/eliminate the invasive nonnative plants that have taken over many parts of the biodiversity areas. A statement on p. 69 refers to ongoing effective “maintenance of non-native invasive plants.” We hope that means removal, as the need is great. But use only bio-organic pesticides where it is not possible to manually remove them.

Stream remediation. We are pleased to see the Glenallan Tributary on this list. The section through Brookside Gardens puts Glenallan Ave. at risk. Many of the streams within the park are deeply incised, with adjacent tree roots undercut. Because stream restorations have their own problems, we suggest developing a plan to reduce runoff volume and velocity into these streams. For stream reaches you do decide to renovate, please consider the recommendations now in draft from the Montgomery County Water Quality Advisory Group.

NNWB RECOMMENDATIONS SUMMARY

1. Delete from the plan unnecessary pavement from Stubbs barn to Brookside; from the west side of Pine Lake (boardwalk instead); and from Brookside Nature Center to Brookside Gardens
2. Do not widen the paved Wheaton Regional trail with renovation, especially not in the conservation area.
3. Move the natural surface beginner bike skills loop to the cleared area where the house was and post signage forbidding use after heavy rain.
4. Preserve the current bridle trail for horses and foot traffic; no bikes.
5. Install a boardwalk with bridge on the east side of Pine Lake close to the water.
6. Site the proposed natural surface Pine Lake Trail on the existing people's choice upper trail as much as possible; bridge the gully.
7. Forego lighting at the proposed entrance to Brookside Gardens from Pine Lake.
8. Move the dog park to the athletic area where it can be fully lit without harm to the conservation area.
9. For lighted athletic areas, use only night sky certified lights and fixtures.
10. Provide massive green infrastructure stormwater management for the massive new impervious surface of the Adventure Sports Park. Plant trees to shade the hangout areas, which can also help with stormwater management.
11. Plant at least 4 acres of trees to offset the planned conversion of more than 4 acres of woods to 2 rectangular athletic fields and a parking lot.
12. Ensure that those fields are grass, not artificial turf.
13. Include green infrastructure stormwater facilities in the plan for the new fields and parking lots using trees, e.g., corridors of trees in the parking lots.
14. Create a plan to effectively address nonnative invasive plants using only bio-organic pesticides where manual removal is not possible.
15. Create a plan to reduce runoff velocity throughout the park to reduce further degradation of park streams and the need for stream remediation. Consider recommendations of the Water Quality Advisory Group on any planned remediation.

Thank you very much for the opportunity to comment on this far-reaching plan. It is sure to make Wheaton Regional Park into a premier destination athletic facility. **The challenge will be to maintain your high standards for resource conservation at the same time.**



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Anne Ambler, Advocacy Chair

THE FOLLOWING ORGANIZATIONS CONCUR WITH OUR RECOMMENDATIONS:

Anacostia Riverkeeper

Trey Sherard, Riverkeeper



**ANACOSTIA
RIVERKEEPER®**

Friends of Sligo Creek

Mike Smith, President



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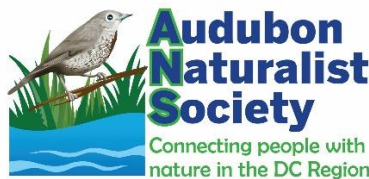


**ANACOSTIA WATERSHED CITIZENS
ADVISORY COMMITTEE**

Dedicated to the protection and restoration of the Anacostia River and its tributaries

Audubon Naturalist Society

Denisse Guitarra, Maryland Conservation Advocate



ANS urges as few trees removed as possible and replacement of those removed.

See: <https://conservationblog.anshome.org/blog/moco-forest-coalition/>

ⁱ NNWB is a 501(c)(3) organization founded in 2003 and incorporated in Maryland.

ⁱⁱ Given the complexity of the report, it is not surprising that a few items are missing from the maps or misnumbered, e.g., SU 6, 7, 8.

ⁱⁱⁱ Suggesting that it should draw from the entire Mid-Atlantic Region (p. 45) is problematic, however, since if successful, that would surely require yet more space devoted to parking.

^{iv} Someone dumped broken concrete in the woods.