

Sumner M. Redstone Global Center for Prevention & Wellness

Neighborhood Park Service:

Strategies to create an equitable and activated park system for the District of Columbia

Authors and Acknowledgements
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Located within the Milken Institute School of Public Health at The George Washington University, the Sumner M. Redstone Global Center for Prevention and Wellness recognizes that chronic disease, health inequities, and climate change are all interconnected and share common drivers. The Redstone Center works within the University and with community partners to support research, share expertise, and advance evidence-based policy solutions to address these interlinked public health threats.

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LINCOLN PARK



Executive Summary

Ranked the #1 park system in the United States three years in a row by the Trust for Public Land, the District of Columbia has a nationally renowned park system. On paper, the District boasts a park system that is (1) highly accessible, with 98% of residents living within a 10-minute walk of a park; (2) equitable, with parks evenly distributed across the city based on race and income demographics of neighborhoods; and (3) high in total acreage of parkland, with 23.9% of the District's land categorized as greenspace. In reality, however, these figures fail to fully capture a park system that many residents would say does not live up to its full potential or reputation. Inconsistently managed and inequitably maintained, the District's park system does not meet the needs of the people who both live near and experience the park system as part of their daily lives.

The District of Columbia faces a unique barrier when trying to improve its park system: it does not own most of its parkland. Due to DC's status as a federal district and despite its broad functionality as a state, the vast majority of the District's parkland is owned by the National Park Service (NPS), a federal agency that is primarily focused on wilderness preservation at large uninhabited national parks across the country.

Most national parks serve as destinations for tourists and adventurers, but most NPS properties in DC function as small neighborhood parks bordered by homes and local businesses in the center of urban communities. This disconnect creates many challenges for the District when it sets out to activate, maintain, or improve the safety of its urban greenspaces.

Inconsistently managed and inequitably maintained, the District's park system does not meet the needs of the people who both live near and experience the park system as part of their daily lives

Challenges

In preparing this report, we interviewed dozens of local residents, decisionmakers, and organizations about their experience trying to activate and/or improve their local greenspace. Several key challenges emerged:

1 Mission Conflict

NPS's mission to preserve spaces in the District of Columbia for the enjoyment of future generations is a poor fit for managing its large portfolio of hundreds of urban parks. Because NPS is charged with preserving spaces, not activating them, its priorities often conflict with the priorities of the District government. Also as a result of its mission and history, NPS is not oriented toward local residents; it does not prioritize the needs and preferences of District residents in its decision making and is ill equipped to manage an urban park system.

2 Jurisdictional Confusion

Control of the District's greenspace is divided between NPS, several District agencies, other federal agencies, and private entities. These boundaries are unclear, which creates jurisdictional confusion for policymakers and residents alike. Furthermore, NPS's lands are divided among several administrative units, each with their own policies and priorities, which further confuses residents and impedes progress on the overall park system. Compounding these matters further, there is no straightforward way to access information about jurisdictional boundaries.

3 Funding Constraints

NPS's limited funding is a major challenge that underpins many of the other issues identified. NPS does not currently have adequate funding to manage its assets in the District of Columbia, with billions of dollars in deferred maintenance costs. These funding gaps hinder maintenance, activation, and, consequently, park use. Funding gaps also drive inequities across the park system because parks in better-resourced neighborhoods can provide supplemental funding through fundraising and community support. Despite the strong need for additional equitable funding streams, NPS's current policies make external investment difficult.

4 Coordination & Vision

Because the District and NPS share control over the District's greenspace, there is no central leadership and vision for the overall park system. At the same time, despite this overlapping jurisdiction, there is no current structure in place for regular coordination between NPS and the District government regarding parks management. This lack of ongoing coordination results in many missed opportunities for collaboration and resource sharing. In the instances when NPS and the District *do* coordinate, the process is burdensome and time consuming.

5 Accountability & Communication

NPS is not positioned to be responsive to DC residents. Because NPS does not proactively engage with the community, District residents find it difficult to communicate with NPS about issues they see in NPS-managed parks. NPS has no centralized, user-friendly system for connecting with residents, and it is not integrated into the District's 311 system for service requests. Lacking statehood, District residents do not elect representatives who oversee NPS. The agency's lack of engagement with and disconnect from local voters means that NPS is not accountable to DC residents and elected officials.

6 Policies & Procedures

Finally, because NPS is not set up to be a steward of urban spaces, its policies and procedures often prevent the types of programming that residents would like to see implemented in their parks. NPS limits how the community can use its spaces, and its permitting process is lengthy and arduous. Its partnership agreements, designed to facilitate collaboration, are also burdensome. NPS's procedures make it very difficult for community organizations to partner with the agency to provide programming on NPS land.

> Together, these challenges have hindered efforts to create an *equitable*, *well-integrated*, and *activated* park system that promotes health for all District residents.


ANACOSTIA PARK

Policy Recommendations for the DISTRICT OF COLUMBIA

The upside of these challenges is that the park system contains significant untapped potential. Based on our research, we identified the following policy recommendations for how the District, NPS, and Congress can better leverage the District's greenspace to create a park system that fully meets the needs of all residents.

Nearly all interviewees agree that to create a cohesive park system that serves the needs of local residents, the District should take control of more neighborhood parks. While accomplishing this would require action by NPS and/or Congress, there are several actions that the District can take independently to improve the park system—and to prepare for a future in which the District directly controls more of its greenspace.

1 Establish an Office of Parks in DPR

The District should establish an Office of Parks within the District Department of Parks and Recreation that is focused on managing the District's interests in NPS land and expanding the District's parks management capacity (as distinct from its recreational facilities). Throughout our conversations, we heard a need for consistent staff resources to be dedicated toward the relationship between the District and NPS, identifying areas of collaboration, tracking ongoing projects on behalf of the District and the public, and managing cooperative management agreements and transfers of jurisdiction. In addition to coordination with NPS, this Office would manage and maintain DPR's portfolio of larger parklands, thereby expanding DPR's parks expertise, ability to focus on long-term parks planning, and maintenance capabilities.

2 Establish a Parks Advisory Board

Alongside the new DPR office, the District should establish a Parks Advisory Board to serve as a coordinating body for relevant agencies and organizations and provide long-term direction for the District's park system. This Board should comprise all relevant parks collaborators, including:

- District agencies;
- NPS;
- Business Improvement Districts;
- Community groups;
- The National Capital Planning Commission; and
- The Commission of Fine Arts

This Board should meet regularly to share information about ongoing projects and to identify opportunities for collaboration, advise the Office of Parks, and prepare a joint action plan focused on the future management of NPS land.

3 Establish a Parks Equity Conservancy

The District should establish a Parks Equity Conservancy to support park maintenance across the District of Columbia. NPS and DC frequently rely on outside partnerships to support maintenance and operations, which puts communities with low income at a disadvantage. The District can take independent steps to address some of these funding gaps by establishing a District-wide Parks Equity Conservancy to support stewardship and improvements across the entire park system. A District-wide Conservancy would leverage District funding and philanthropic contributions to support park space across the District, particularly in historically neglected neighbor-hoods. Alongside the conservancy, DPR should provide technical assistance to communities that are looking to activate and maintain their local greenspace.


EAST POTOMAC PARK

Source: NPS

Policy Recommendations for the DISTRICT & NPS

The national interest in some sites, such as the National Mall and monuments, means that the overall park system will always implicate multiple jurisdictions. From our research, we identified several ways the District and NPS can work together to transfer jurisdiction where appropriate and to improve joint management of the DC park system over the long term. While these recommendations will require NPS resources at the outset, they will ultimately reduce NPS's burden in managing parkland by leveraging District resources and streamlining operations.

1 Prepare a Joint Action Plan on Management

The District and NPS should prepare a joint action plan that is specifically focused on future management of NPS land to fully meet the potential of the District's park system, given the constraints and capabilities of both NPS and the District government. This plan should identify land that would be appropriate for cooperative management agreements and transfers of jurisdiction, as well as areas where the two jurisdictions can coordinate on maintenance and operations.

2 Establish a Shared Database

The District and NPS should establish a shared database to consolidate (and synchronize) information on federal and local parks and open spaces. A shared database will address the stated need for improved information sharing and establish a common and transparent understanding of who owns what. This database would be used to inform coordination between jurisdictions and to facilitate greater transparency with the public.

3 Coordinate Service Request Response

The District should work with NPS to develop a coordinated approach to handling service requests. Currently, NPS is not integrated into the District's 311 system, and the agency does not have its own centralized system across its administrative units. A coordinated system would make it easier for residents to reach the appropriate contact when issues arise with their local parks.

4 Create One Online Permitting System

The District and NPS should work together to establish one permitting system for all parks. Currently, NPS does not have an online permit application and different standards are applied depending on administrative unit. The two jurisdictions should work together to develop a joint system for all parks and facilities regardless of managing agency.


ROCK CREEK

Policy Recommendations for the

NATIONAL PARK SERVICE

In addition to working with the District on the recommendations above, we identified several actions that NPS could take independently to improve its stewardship of its DC neighborhood parks. We offer the following recommendations for NPS that can be taken without congressional action.

1 Simplify its Permitting and Partnership Process

NPS should simplify its permitting and partnership processes. For permitting, we recommend that NPS establish an online permit application, streamline applications, and provide permit consistency across operational units. For partnerships, NPS should seek to simplify the existing partnership agreements to make them more accessible to community groups and decrease the burden on NPS in overseeing them.

2 Revise Administrative Boundaries

NPS should consider revising the administrative units in the National Capital Region. Currently, NPS operates six different units in the District, each with their own operating procedures and policies. NPS should consider redrawing the three major units into just two so that the National Mall and Monuments are in one unit, reflecting their national use, with the rest of the parks in a second unit geared toward local use.

3 Increase Community Engagement

NPS should increase community engagement to build connections with District residents and ensure that their management of park resources consistently reflect the needs of local residents.

4 Prioritize Local Use of Parklands

NPS should amend its management plans to prioritize local uses for community parks to emphasize the goal of sustainable use of these spaces by the public, rather than prioritizing preservation for future generations.


MONUMENT GROUNDS

Policy Recommendations for CONGRESS

While the District and NPS can take many steps without congressional action (including transfers of jurisdiction), Congress can more permanently address some of the issues identified in this report by transferring land title to the District outright, increasing federal funding for NPS's urban parks, and by statutorily recognizing the unique needs of urban parks.

1 Transfer Ownership of Local Parks to DC

Congress should transfer title of local-facing parks to the District of Columbia to give District residents autonomy and control over their local park system. Land transfers would also relieve the federal government of the costs of managing and maintaining DC's neighborhood parks and allow NPS to focus on assets most central to its mission.

2 Establish an Urban Parks Division

Congress should establish an Urban Parks Division within NPS to address the fact that NPS's conservation-based mission does not map onto the needs and pressures of parks located in an urban environment. By locating urban parks in a separate division, NPS can establish a separate set of founding rules and regulations more responsive to the realities and needs of urban parks.

3 Increase Funding & Support to NPS

Congress should increase funding for urban NPS parks, particularly in the National Capital Region, to address a significant deferred maintenance budget and staffing shortages.

+ Strengthen Presidential Appointments

Congress and the President should ensure that appointments to the Commission of Fine Arts and National Capital Planning Commission have demonstrated experience with and commitment to active urban public spaces.

> Together, these recommendations will help both NPS and the District of Columbia realize the full potential of the District's park system to meet the needs of District residents and maximize the health and environmental benefits of the District's greenspaces.


STANTON PARK



ROCK CREEK PARK

Introduction

A Flattering, but Flawed Reputation

Since its inception as the nation's capital, the District of Columbia was designed to impress. Pierre L'Enfant, planner of the District's landscape, envisioned a federal city defined by grand avenues, architectural beauty, and an "abundance of tree groves, parks, and open space." From Benjamin Banneker to Eliza Scidmore, some of the country's best and most creative minds have worked to realize this ambitious vision.

The towering monuments, sweeping vistas, neoclassical architecture, and scenic cherry blossoms unite to create a grand cultural image drawing millions of national and international visitors every year. The National Park Service (NPS) plays a key role in this image, managing many of the District's most famous icons, from the Washington Monument to the Lincoln Memorial. But the National Park Service's jurisdiction extends well beyond the National Mall and is integrated into residential neighborhoods across the city, impacting everyday life for the over 700,000 people who call Washington, D.C. home.

Today, nearly 90% of the park space in the District of Columbia is owned and/or managed by the National Park Service, a unique arrangement for the agency, which primarily focuses on wilderness preservation at large uninhabited national parks far from urban centers, while the District's own Department of Parks and Recreation (DPR) manages less than 10%.

By some measures, NPS's management of the District's parks appears to be a success. National rankings of city parks continually laud the District for its abundant greenspace, with perhaps its most prestigious accolade coming from the Trust for Public Land, which, in 2019, 2021, and 2022, ranked Washington, D.C. as having the #1 park system among the 100 most populous cities in the United States. When broken down by category, the Trust for Public Land gave the District particularly high scores in parks access, with 98% of the city's residents living within a 10-minute walk of a park; acreage, with a high total percentage of land dedicated to parks (23.9%); investment, reflecting the financial stability of the park system based on the amount spent per capita on parks and recreation; and equity, reflecting the fairness in the distribution of parks and parks access across neighborhoods by race and income level. Unfortunately, this largely favorable analysis from the Trust for Public Land does not reflect the lived experience of District residents—the very community supposedly benefitting from park equity, access, investments, and acreage. Instead, NPS's ownership of the District's parkland perpetuates a neighborhood park system that does not center the needs of local residents, while also restricting the local government's ability to create a unified and equitable park system.

> The largely favorable analysis from the Trust for Public Land does not reflect the lived experience of District residents—the very community supposedly benefitting from park equity, investments, and acreage

The following are examples of how the Trust for Public Land's ranking obscures the realities of the District's park system.

Is it functionally accessible?

In the ParkScore ranking, the District received a nearly perfect score for parks access based on the fact that, on paper, 98% of residents live within a 10-minute walk of a park. In practice, however, being located near a park does not mean a resident can access a park. For example, many of the District's largest parks are ringed or divided by high-speed roads: residents can gaze across the street at trees in Rock Creek Park or Fort Dupont Park but cannot safely access them; much of Anacostia Park is cut off from surrounding neighborhoods by the 295 highway. Further, these figures do not capture the varying degrees of access to high quality park space across the District. A more honest look at what access means in practice has been acknowledged by DPR's Ready2Play Master Plan, which notes that despite this high access score, access is inequitable across DC due to safety, traffic conditions, and other factors. While nearly all Washingtonians have quick access to greenspace on a map, this access does not exist in reality.

Is it actually usable?

The District's score for total acreage is very high, but this score obscures the fact that much of the District's greenspace has limited utility to residents. Most of the District's parks are very small; in fact, 70% of the District's parks are less than one acre in size. Compared to peer cities, this is small; according to ParkScore, the District's score of median park size was just 9 (out of 100). For comparison, Arlington's 2022 median park score was 19, and Philadelphia's was 25. While small parks can play an important role in a park system when properly activated, they are often underprioritized by agencies for funding and maintenance. As a result, many people live near small parks that provide little more than a grass triangle without so much as a bench to sit on. Indeed, a 2005 survey by the Government Accountability Office (GAO) found that 154 of NPS's 356 properties in the District have no facilities at all—not even park benches. Even when spaces do have amenities, NPS has been reluctant to consider alterations to parks to make them more useful for residents, or has even pushed for changes that fence off spaces and make them less usable. In addition, NPS's rules and requirements for using its spaces make it very difficult for the District government or local residents to install needed recreational infrastructure or to use their spaces for community activities.

Is it financially stable?

The District received a very high investment score, a score which aggregates park and recreation spending across all agencies and organizations within a city. At $284 per capita per year, DC had among the highest investment across the country. But this figure obscures financial weaknesses in the District's park system. First, it does not reflect inequitable investments across the system, as the National Mall and Monuments receive nearly 100 times more funding per acre than NPS's local community parks. In addition, the system is severely under-resourced compared to its needs, leading to poor maintenance and activation. On maintenance alone, deferred costs at NPS properties in the District of Columbia exceed $2 billion. In addition to these deferred maintenance needs, many parks have no assets at all. Adding the costs of building new infrastructure in inactivated parks would raise the funding deficit even higher.

Is it genuinely equitable?

The District also received a high equity score, suggesting that parks are evenly distributed across the city based on neighborhood-level race and income demographics. But this score obscures the fact that parks in neighborhoods with low income and majority Black populations are poorly activated and in worse condition than parks in neighborhoods with higher income and majority white populations. In its master planning process, DPR heard from residents of neighborhoods with high equity index scores that maintenance, upkeep, and community engagement has continued to perpetuate inequitable parks access. Inequities run the gamut from cleanliness, to safety, to the quality of amenities, to varying traffic conditions abutting neighborhood parks.



SOAPSTONE VALLEY PARK

In short, the District of Columbia's Park System is one of great unrealized potential. Because NPS is poorly equipped to manage urban parks, and the District government controls only a small percentage of DC's greenspace, there is no entity well positioned to successfully oversee management of the entire park system.

Dozens of local leaders and organizations interviewed in this report identified the same central themes underlying the issues afflicting DC's NPS-owned parks: (1) NPS's wilderness preservation mission is a poor fit for managing the District's portfolio of small urban parks ; (2) the split jurisdiction between NPS and the District government inhibits progress and cohesive vision; (3) NPS is so severely under-resourced that it is unable to address even known issues at its DC parks; and (4) NPS is not accountable to local residents. DC local residents are doubly disadvantaged given the longstanding disenfranchisement of the District of Columbia whose chosen representatives are denied the equal authority and oversight over NPS or federal law present in other states.

These difficulties have been acknowledged to some extent by both the National Park Service and District of Columbia government. The 2010 CapitalSpace Initiative, jointly produced by federal and local agencies, suggested improving coordinated management of the park system and equitably expanding it to meet existing and future community needs. More recently, NPS's 2017 Small Parks Management Plan set in motion an inventory of their small parks for the purpose of transferring those with no federal cultural or historic value to the District. Despite these shared objectives, NPS has never engaged in sustained coordination with the local government regarding NPS parks in the District of Columbia. This report is the first attempt to tackle the specific question:

Given the unique relationship between NPS and the District, how can both entities maximize their resources to create a high quality, accessible, equitable park system that realizes the full potential of all DC parks?

Why Parks? The connection between mind, body, & planet

Urban parks protect and promote public health through a series of connected interactions between people and the environment. Some health benefits are obvious. For example, parks provide space for physical activity, thereby acting as a protective factor against cardiovascular and respiratory diseases. Activated parks house activities that promote social connection and belonging, either through more active events like sports leagues or more restful, communal events like outdoor movie nights. They can also provide more solitary opportunities to commune with nature, which can provide mental health benefits.

Other interactions are less obvious, such as valuable ecosystem services such as carbon storage, pollutant filtration, and heat protection. As acknowledged by DPR's Ready2Play Plan, both parks and recreation centers can support urban sustainability and adaptation to climate change threats.

Appendix B of this report provides further background on the myriad ways urban greenspace benefits human and planetary health.


C&O TOW PATH


FLETCHER'S COVE

Activation, Equity, & Health: *The Three Keys to a Better Park System*

Every agency, organization, and community member who touches a park in the District of Columbia has their own goals and preferences for park use. Furthermore, each park is different, and what might be appropriate in one space would not be in another. Recognizing this fact, this report is focused on how to maximize the potential of the overall park system toward a set of foundational goals: activation, equity, and health. These goals reflect the existing park management plans that have been prepared by local and federal agencies, as well as the missions of NPS and District agencies. For purposes of this report, we define these terms as follows:

Activation

> Using parks and open spaces for people, in ways that improve quality of life and community through dynamic engagement.

Parks have multiple benefits for public health and the environment. These benefits can only be realized when public space is accessible, inviting, and meets the demands of the surrounding community. One of our primary goals is to activate parks so that they can be used for people, fully realizing their benefits for health and the environment. Activation can include permanent physical improvements or temporary investments like programming.

Activation will have a different meaning for every park: in a downtown triangle park tucked into a business corridor, it might mean inviting benches for nearby workers to use during their lunch break; in a residential medium-sized park, it might include playgrounds and family programming; and in a large wooded park, it could include protecting the tree canopy while providing designated, well-maintained walking trails.

Activation in Action

It is crucial to note that activation means different things depending on the space, and that we do not propose building amenities without considering context. This can be illustrated by proposals in the CapitalSpace Initiative. To make the forested Fort Circle Parks an ideal destination, the report proposes implementing a linked greenway with more welcoming park edges and enhancing the historic/cultural and natural interpretative amenities and community gathering spaces.

For the smaller downtown parks, the report proposes co-creating vibrant community spaces which "help encourage neighbor interaction, make neighborhoods safer, and improve the environmental health of the city through additional tree canopy, native landscapes, and permeable surfaces."

Both strategies aim to make our forested and city parks more inviting spaces for local communities through maintenance, upgrades, and partnerships to improve access to the natural and cultural resources in these areas.

For parks to be fully activated, they must be highly accessible to all people, including pedestrians, bicyclists, and other nonmotorized users, and must integrate inclusive and universal design to make spaces feel welcome and usable regardless of race, ethnicity, financial status, or ability. This goal is consistent with the priorities of both the District and NPS.

The District's 2021 Comprehensive Plan's Parks, Recreation & Open Space Element aims to "preserve and enhance parks and open spaces within the District of Columbia to meet active and passive recreational needs through universal access." DPR's Ready2Play Plan prioritizes parks that provide safe, accessible, and inclusive connections to nature and recreational opportunities.

Equity

> Strategically allocate resources so that residents have equal access to high-quality parks across all neighborhoods, regardless of race and income.

Another key priority is to ensure that high-quality park access is equitably distributed across neighborhoods by race and income level. Systemic racism and neighborhood disinvestment has a long legacy of limiting access to greenspace, in both quantity and quality.

DPR has heard from residents in neighborhoods with lower income that maintenance, upkeep, the process of engagement, and sense of community ownership over project scope and design continue to perpetuate inequity across the park system. Furthermore, "a lack of redundant inventory in these areas... exacerbates the impact and concerns concerns around poor quality and lack of maintenance." Because communities of color have been historically excluded from greenspace, it is imperative to center these communities in considerations around park activation.

> Communities of color have been historically excluded from greenspace

Citing the tangible health benefit of proximity to greenspace, particularly for low-income residents, DC Health's Health Equity Report: District of Columbia 2018 strongly recommends "community involvement and consideration of local context in designed natural environments." DPR's Ready2Play Plan includes equity as a priority, seeking to promote an approach to investment and policy that addresses the historical inequities and racism that communities of color have faced. NPS has recently taken steps toward prioritizing equity; in its Healthy Parks, Healthy People Strategic Plan, NPS included "providing equitable access to open spaces and natural places" as one of its guiding principles.



SHEPHERD PARKWAY

SOURCE: NPS

Greenspace & Health Equity

Inequitable distribution, access, and availability of greenspaces continues to be shaped by historical and contemporary practices of discrimination and segregation (Morello-Frosch, 2002). Extensively recognized as a form of environmental injustice, some research on the availability and accessibility of greenspace suggests that minoritized residents who live in neighborhoods with lower income and lack access to greenspaces may experience worse overall health outcomes and a lower quality of life relative those who live in neighborhoods with higher income and greater access to greenspace (Diez Roux & Mair, 2010).

In a timely example, Lu et al. (2021) found a significant correlation between higher ratios of greenspace and subsequent lower racial disparities in COVID-19 infection rates, suggesting that environmental factors such as access to greenspace may play a role in disease inequity.

Additionally, an analysis conducted in Philadelphia, a metropolitan center similar in population size to DC, found that neighborhoods with higher income levels had disproportionate access to urban greenspaces. Furthermore, the investigators predicted that increasing greenness via tree canopy would specifically prevent a higher proportion of premature death in neighborhoods with lower-socioeconomic status (Kondo et al. 2020).

Health

> Ensure that design and stewardship of the park system maximally addresses health inequities and improves health outcomes for all residents.

Our vision for the District's park system also centers community health. Parks benefit human health by providing opportunities for physical activity, stress reduction and socialization, and economic benefits for local communities, as well as improved environmental health through cleaner water and air quality and reduced energy consumption.

Health is a priority shared by the District and NPS. The Parks Element of the District's Comprehensive Plan prioritizes promoting health and wellness, and improving environmental quality. More specifically, DPR's Ready2Play Plan aims to "ensure that design of its parks reflects a focus on the social determinants of health, with overarching goals to decrease health inequities and improve health outcomes for communities suffering from long-standing, systemic inequities." NPS has recently taken steps to prioritize the health benefits of its park systems, and its "Healthy Parks Healthy People" initiative spotlights the importance of parks to advancing public health. Citing that chronic disease accounts for 75% of healthcare expenditures in the U.S and that Americans spend an average 93% of their time indoors each day, NPS's plan asserts that "parks are good medicine" and a "gateway to better health" for our nation. For greenspaces to support physical, mental, community, and environmental health, the spaces themselves must be safe, accessible, and well maintained. Increasing availability and accessibility to public parks that meet community need in an equitable and contextually appropriate way is a public health issue.

Parks as Medicine for Physical Health

Significant evidence links greenspace access to improved physical health outcomes. Previous studies have shown that increased access to greenspace leads to reductions in cardiovascular and respiratory disease (Gascon et al., 2016; Richardson & Mitchell, 2010), improved pregnancy outcomes, reductions in the prevalence of type 2 diabetes mellitus, and declines in overall mortality (WHO 2016).

One way in which accessible and safe greenspaces improve physical health is through the promotion of physical activity (Mytton et al., 2012). The U.S Health and Human Services Community Preventative Services Task Force states that park, trail, and greenway infrastructure interventions, when combined with additional interventions such as public awareness activities, not only increase the overall number of people engaging in moderate-to-vigorous physical activity but also lead to overall increases in the number of people using the greenspace (HHS 2022).

Furthermore, usable and safe greenspaces reduce health disparities common to populations with a lower socio-economic status, including all-cause mortality (Michell & Popham, 2008; Wang & Lan, 2019). See Appendix C for additional examples of the varied health benefits of parks and greenspace.


RESERVATION 630


ANACOSTIA PARK

"If people have easy access to trails, parks, and other open space, they are more likely to engage in physical [and social, environmental and emotional] activity that can positively shape their health."
– The CapitalSpace Plan



L'ENFANT-ELLICOTT MAP OF WASHINGTON, 1792

Source: NPS

Background: How Did We Get Here?

NPS & the L'Enfant Plan's Legacy

In 1790, President George Washington established the District of Columbia and appointed Pierre L'Enfant as the first U.S City Surveyor, along with three commissioners, to plan the District's layout. Their chief intention was to build a capital city purely federal in character (Heine, 1953). The L'Enfant Plan centered on a network of broad diagonal axes with sweeping vistas around the design's focal point of the city: the center of the federal government (LeeDecker, 2020). Due to professional disputes with his fellow commissioners, L'Enfant resigned two years after the project began. Although the project continued on without him, his vision was never fully realized.

Future federal efforts sought to pursue L'Enfant's original vision. In 1902, the McMillan Plan established the National Mall open greenway, anchoring the Monumental Core of federal buildings and helping DC progress toward a more comprehensive public park system. Elements of the L'Enfant Plan are present in today's landscape, not just through expansive greenways, but in the hundreds of small circle and triangle parks.

These elements are also embedded in the National Park Service's vision for the District's park system. An NPS spokesman for the National Capital Region has said that NPS's role in preserving federal lands for future generations includes maintaining the integrity of the L'Enfant Plan. NPS aims to preserve historical and cultural places deemed nationally significant. Their mission seeks to protect expansive natural areas as well as Civil War forts, monuments and memorials, and historic sites like Ford's Theater. However, these "nationally significant" parks make up a small portion of the total parks in the District. The District contains many parks (often under an acre in size) originally envisioned by the L'Enfant Plan, but that do not include monuments or significant infrastructure. NPS manages the vast majority of these as well. Not all elements of L'Enfant's vision were realized. For instance, he envisioned each circle or square being given to a state to develop and program (Fukuyama, 2007), suggesting that L'Enfant envisaged more active use of these areas than the stately but unusable spaces that many have become.

Subsequent federal planners later began to characterize the circles, squares, and triangles as being intended for future national monuments, a shift which made room for proliferating memorials but also limited opportunities to use these spaces for community needs as in other cities.





The Evolution of the District's Park System Over Time

1662

Settler colonialism in the Chesapeake Bay

European settlers begin to colonize the area now known as the District of Columbia. Several tribal nations, including the Piscataway and Nacotchtank (Anacostan) peoples, are largely forced to leave their ancestral lands or killed by war or disease brought by settlers.

1802

Superintendent of Public Buildings

DC is established as its own municipality. The District's jurisdiction is limited to private property. All parks are considered public grounds owned by the federal U.S. government.

1849

Department of the Interior (DOI) is established

1867

Chief Engineer of the U.S Army

In 1898, DC parks are moved under the exclusive control the Chief Engineer of the U.S Army, solidifying federal control over all DC parks.

1916

National Park System

NPS is established as a bureau under the DOI.

1933

National Park System

NPS manages DC parks, which are now referred to as the National Capital Parks.

1942

District of Columbia Recreation Board is authorized by Congress

A group of DC residents who determine policy relating to public recreation at facilities still owned and operated by NPS.

Timeline Continued: More Balanced (Yet Still Imbalanced) Control

1948-1949

The DOI reaffirms its non-discrimination policy on federal parkland. The DC Recreation Board refuses integration, attempts to gain control of federal sites and starts utilizing NPS Land. In response, the DOI attempts to reclaim 62 playgrounds and retain control of six of the eight public pools in DC.

Certain NPS parklands and recreational facilities are now available for DC for their own recreational programs—as organized by DC and the NPS superintendent responsible for the location. DC does not have the authority to determine policies in these parks; authority is still legally held by NPS.

1950-1958

Construction of I-295 in Southeast DC separates residents from Anacostia Park and river, a barrier that persists today

In 1958, the US Supreme Court outlaws segregation in public parks nationwide.

1968

District of Columbia Recreation Board is dissolved

Local-use recreational facilities are transferred to the newly created District of Columbia Department of Recreation

A small number of local-use parks are transferred to the Department of Environmental Services, which in 1984 merges with the Department of Transportation to become the DC Department of Public Works.

1973

Home Rule Act

As part of establishing stronger DC self-governance, this act facilitates Transfers of Jurisdiction (TOJ) of (mainly recreational) lands from NPS to DC, enabling DC to manage the property and associated programs but not own the land outright.

The Home Rule Act facilitates a few transfers of ownership of parks from NPS to the District as well.

In accordance with the L'Enfant Plan, NPS keeps all parks deemed to be nationally historically significant, including small parks which could house future monuments to nationally historic figures.

1989

DC Department of Recreation is renamed the DC Department of Parks and Recreation

The Division of Park Services Act renames the agency and transfers control of parcels and monuments from the Department of Public Works.

2019

Federal Lands Package

DC Congresswoman Eleanor Holmes Norton introduces the Federal Lands Package, which expressly permits Cooperative Management Agreements (CMA) between DC and NPS. Before this was enacted, NPS had CMAs with several cities and states but there was uncertainty about whether they could have CMAs with DC.

This leads to a CMA between NPS, the District, and the Downtown Business Improvement District for the recently completed Franklin Park renovation.



FRANKLIN PARK CHILDREN'S GARDEN



FRANKLIN PARK

Transfers of Jurisdiction & Cooperative Management Agreements

Throughout the District's history, NPS and the District have employed at least a dozen different management approaches to NPS properties, including memoranda of understanding, leases, and cooperative agreements. The two key approaches that we will discuss in this report are Transfers of Jurisdiction (TOJ) and Cooperative Management Agreements (CMA).

Transfers of Jurisdiction

A Transfer of Jurisdiction is not a transfer of ownership (title). Rather, a TOJ of NPS parkland to the District grants the District authority to administer, maintain, and manage the property while NPS retains ownership. NPS has general statutory authority to transfer jurisdiction over park properties that it owns in the District to the District government, while a transfer of ownership would require federal legislation. Since 1933, NPS has transferred several properties to the District using the TOJ process; transferred parklands are primarily managed by DC's Department of Parks and Recreation. Beyond a requirement that transferred parks be maintained for recreational use, NPS does not exert control over DPR's management of these properties.

Cooperative Management Agreements

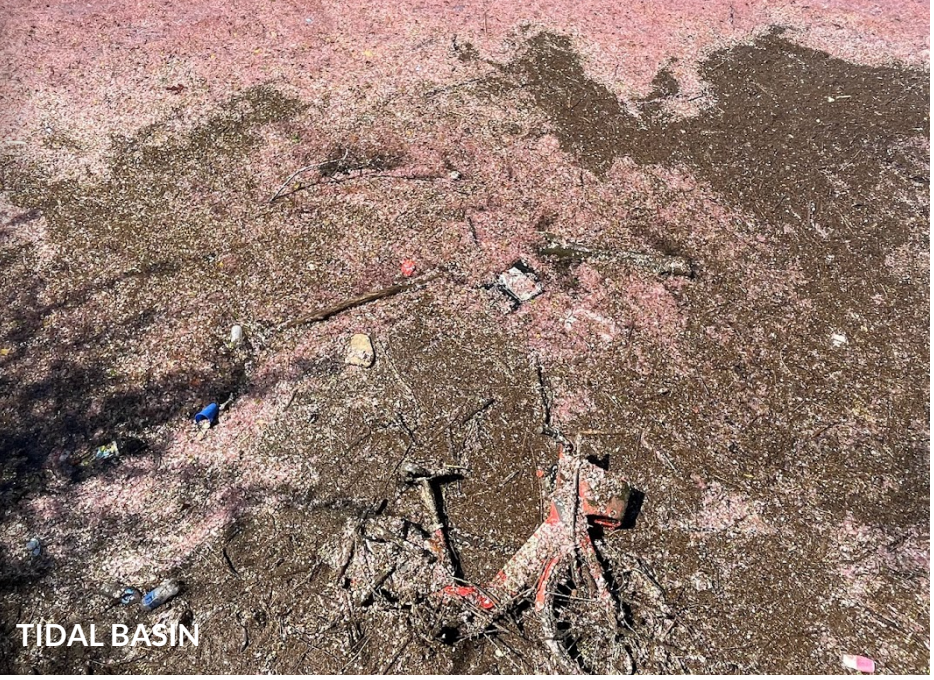
A Cooperative Management Agreement is an agreement between NPS and a state or local government agency to provide for the cooperative management of federal and state or local park areas where a unit of the national park system is located near a state or local park area.

Until 2019, there was some question as to whether NPS was authorized to enter into CMAs with the District; that year, the Federal Lands Package made clear that they were permitted. This led to the first use of a CMA in the District for the $21 million renovation of downtown Franklin Park.

Franklin Park: The First Cooperative Management Agreement between NPS & DPR

The upgrade of Franklin Park, DC's largest downtown park, was a long-time goal for the District. The renovation took 15 months and cost $21 million. Improvements included ADA-accessible sidewalks, new tree cover and covered seating, a new play area, and a stormwater retention rain garden. The project had several points of inter-group and community tension. The District made a much larger financial contribution to the renovation and some expressed frustration over NPS's disproportionate power in decision-making.

While the District provided the capital funding, and the Business Improvement District (BID) maintains and manages the park, NPS continues to oversee large permits—meaning that NPS ultimately controls what the park is used for. Additionally, many community members were upset about the renovation's displacement of the encampment and services for unhoused people living in Franklin Park, and early efforts by families to create a much-needed playground were scaled back.


TIDAL BASIN


BEACH DRIVE

DC Parks Today

Today, the District of Columbia contains thousands of acres of parklands and recreational amenities consisting of large wooded parks, the National Mall and monuments, downtown parks, and many small circle, square, and triangle parks located across the city. The park system's structure is unique in that it is divided between different jurisdictions comprising agencies within the federal government and the District of Columbia government. While the District has gained some autonomy through the Home Rule Act, the majority of its open spaces remain under the jurisdiction of the National Park Service. Though estimates vary (see Appendix B), most sources agree that NPS operates nearly 90 percent of the District's public park system.

> While estimates vary, most sources agree that NPS operates nearly 90 percent of the District's public park system

While NPS's best-known and best-resourced park in the District is the National Mall, NPS also manages Rock Creek Park in DC's northwest, large wooded areas east of the Anacostia River, and nearly all of the downtown parks, as well as hundreds of small circles, triangles, and squares scattered across the city.

Altogether, NPS controls over 6,500 acres encompassing about 356 individual properties that vary in size and type. The circle, square, and triangle parks represent the most numerous type of property, while the parks and parkways constitute the largest acreage. Over two-thirds of the 356 NPS parks are smaller than 1 acre. While some of the small parks have benches, monuments, or playground equipment, most have no amenities. Twenty six percent of the District's parkland is located in a designated historic district, and many NPS parks contain historic sites related to the Civil or Revolutionary Wars or other historical events and figures. In addition to NPS land, the federal government owns and manages the 446-acre National Arboretum; the U.S Capitol Complex; the National Zoo; the Armed Forces Retirement Home; and a number of federal campuses and buildings with landscaped grounds, natural areas, courtyards, public plazas and recreational amenities.

Since 1950, some of the former NPS land has been transferred by TOJ to the District of Columbia, largely for recreational purposes and under the jurisdiction of the District Department of Parks and Recreation (DPR). DPR also manages some District-owned land that was transferred from the federal government by title. Today, DPR's portfolio encompasses 851 acres of greenspace across 243 park sites, from small triangle parks to regional destinations.

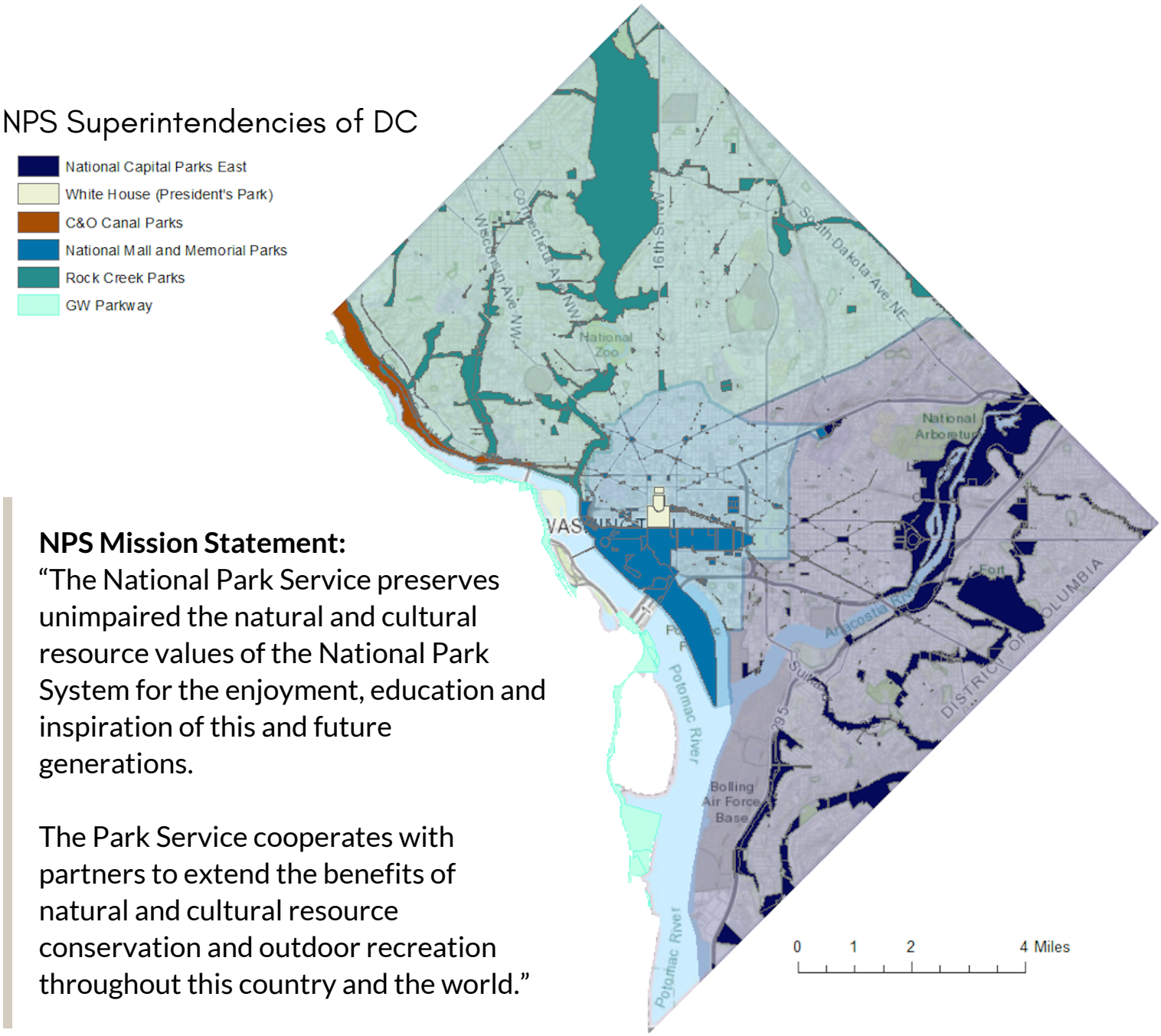
In addition to DPR, DC Public Schools (DCPS) manages a significant percentage of the District's recreational facilities, including playgrounds, fields, and tennis and basketball courts. DCPS manages one third of the District's active recreation fields and provides nearly half of its playgrounds. The District Department of Transportation (DDOT) maintains the perimeter of some DCPS schoolyards, the local trails network, and approximately 250 open space tracts such as triangles and plazas within the city Right of Way (ROW). The DC Department of Energy & Environment (DOEE) also manages a small number of sites including Kingman and Heritage Islands. In addition to these federal and District spaces, the District of Columbia contains a growing number of publicly accessible parks that are privately owned.

How National Parklands are Managed in an Urban City

NPS parks in the District of Columbia are divided into six administrative units referred to as superintendencies, which all fall under NPS's National Capital Region (Region 1 of NPS's twelve regions across the country). Each superintendency is led by a superintendent who manages the properties under their jurisdiction.

Superintendents identify and act on priorities for their designated parks, and decide which NPS projects will progress based on budgetary limitations and opportunities.

The NPS superintendencies with parks in the District include Rock Creek Park; National Capital Parks – East (NACE); National Mall and Memorial Parks (NAMA); the Chesapeake & Ohio Canal National Historic Park (C&O Canal); George Washington Memorial Parkway (GW Parkway); and the White House – President's Park. Most of the national parkland in the District is concentrated in NACE, Rock Creek Park, and NAMA; the local needs in these superintendencies will be the primary focus of this report.

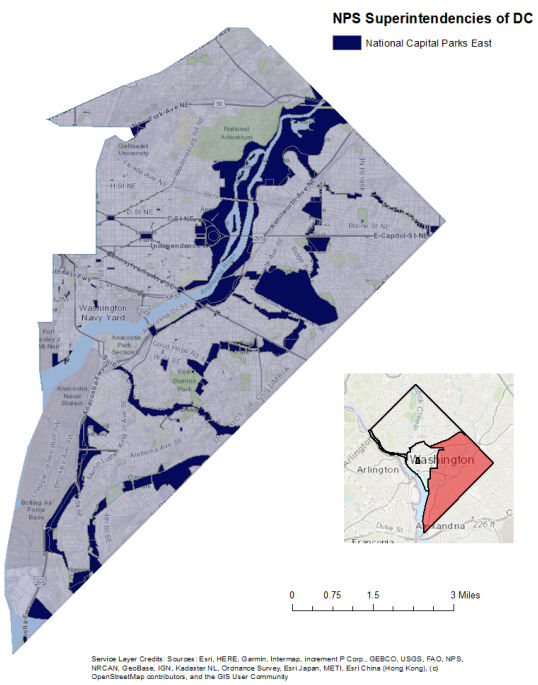


NPS Mission Statement:
"The National Park Service preserves unimpaired the natural and cultural resource values of the National Park System for the enjoyment, education and inspiration of this and future generations.

The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world."

Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

National Capital Parks – East (NACE)



- NACE covers a diverse set of parks across the eastern half of Washington, DC, and the Maryland suburbs. In DC, NACE covers most the parklands south of Rhode Island Avenue and east of 2nd Street NE.
- NACE includes all NPS parks east of the Anacostia River, including Anacostia Park, one of DC's largest recreation areas; wooded parks Fort Dupont, Oxon Run Parkway, and Fort Circle parks; Kenilworth Park & Aquatic Gardens; and historic sites including the Civil War Defenses of Washington and the Frederick Douglass National Historic Site.
- NACE also includes the parks of Capitol Hill, including Folger, Lincoln, Stanton, and Marion Parks, and 59 inner-city triangles and squares.
- Size: NACE encompasses 2,348 acres in DC, with additional acreage in Maryland (GAO).
- Funding: NPS's FY 2023 funding request for NACE includes some parks within the NAMA and Rock Creek superintendencies. Funding for this group, which appears to encompass the District's neighborhood parks, is just $1,326/acre (across DC and Maryland).

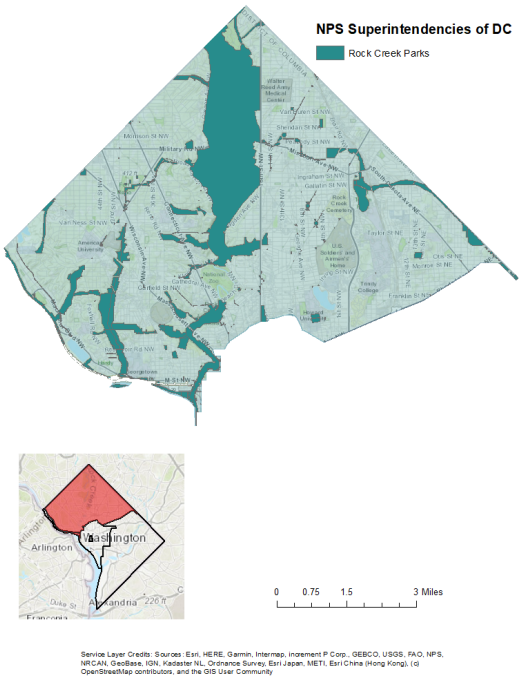
National Mall & Memorial Parks (NAMA)



- NAMA's main property is the National Mall and national monuments, and it is largely oriented toward visitors to the District rather than local residents.
- NAMA also includes 156 reservations, circles, fountains and more in the downtown area and adjacent neighborhoods, and covers all of the open space downtown, including Farragut, McPherson, and Franklin Squares, as well as Hains Point and Potomac Park.
- Size: NAMA encompasses 744 acres (GAO).
- Funding: NPS's FY 2023 funding request for NAMA includes just 371 acres, with the remainder included in NACE's budget. For the 371 acres (which comprise the National Mall and Memorial Park core), the requested budget is $109,685/acre.

NOTE: NPS funding estimates are based on NPS's Budget Justifications and Performance Information for Fiscal Year 2023. These budgets are divided differently from the superintendencies, making it difficult to estimate precise funding allocations per acre. The budget justification for NACE includes several parks that are located in NAMA and Rock Creek, making it difficult to estimate how much each superintendency actually receives. See Appendix B for more information.

Rock Creek Park



- The Rock Creek Park superintendency includes Rock Creek Park, which, at 1,754 acres, is the District's largest park. Rock Creek Park is mostly forested and includes many multi-use trails (both official and unofficial), as well as a creek, historic buildings, and outdoor gathering spaces with picnic tables (many in quite poor shape). A major north-south highway through the park was recently returned to nonmotorized use, but freeway-style east-west roads still divide the park.
- This superintendency also manages 99 additional areas in the northwest part of the District, including Meridian Hill Park (locally known as Malcolm X Park), Fort Bunker Hill Park, and over 40 circle, square and triangle parks.
- Size: The entire Rock Creek Park unit encompasses 2,719 acres (GAO).
- Funding: NPS's FY 2023 funding request for Rock Creek Park alone was about $5,956/acre.

NOTE: NPS funding estimates are based on NPS's Budget Justifications and Performance Information for Fiscal Year 2023. These budgets are divided differently from the superintendencies, making it difficult to estimate precise funding allocations per acre. The budget justification for NACE includes several parks that are located in NAMA and Rock Creek, making it difficult to estimate how much each superintendency actually receives. See Appendix B for more information.



The C&O Canal

The C&O Canal runs for 184 ½ miles, from Georgetown in DC to Cumberland, Maryland. About five miles of the canal are located within the District, providing an important urban recreational space for DC residents, including the Capital Crescent Trail and the C&O tow path.

Users of the path and trail might be surprised to learn that because this area is part of the historic canal, both are administered by the C&O Canal superintendent, who is located 72 miles from DC and has no relationship with the District of Columbia or its residents.



PEIRCE MILL



Complicating Federal Powers: The U.S. Commission of Fine Arts & The National Capital Planning Commission

In addition to NPS, two other federal entities exert significant authority over the District's park planning and development: the National Capital Planning Commission (NCPC) and the U.S. Commission of Fine Arts (CFA). These federal agencies plan for and review proposed development that could impact federal interests in DC's parks and open spaces. Because they maintain approval power, the added bureaucracy can add time and complexity to decision-making about both NPS and District-owned parks.

In 1910, Congress established the U.S. Commission of Fine Arts (CFA) as a permanent body to advise the federal government on matters pertaining to the arts and national symbols, and to guide the architectural development of Washington. The CFA's surprisingly expansive authority includes the location and development of statues, fountains, and monuments—and parks. Today, the CFA's seven members, all presidentially appointed, review designs proposed for memorials, public spaces, and new or renovated government buildings, and even on privately owned properties in certain areas of Washington (such as Georgetown). In reviewing design proposals, they see themselves as a steward of the cultural heritage in DC and thereby responsible for "protecting the dignity of the nation's capital." If NPS or the District wishes to modify the layout of a park or public space, or establish, modify, or install art in a park or public space, they must submit their project to the CFA for review and incorporate the CFA's recommendations into the final design.

Many advocates believe that the CFA often interprets "dignity of the nation's capital" to mean a sort of stately vacancy, with large empty spaces devoid of people and best viewed from long distances. This approach is distinct from the management philosophy of most other world capitals which can be extremely dignified and respected, but also more welcoming as urban places to visitors and locals alike. The CFA has little interaction with or accountability to the public and District civic leaders: there is no formal role for DC officials or residents in the CFA (whereas some District officials are members of NCPC).

In 1924, the National Capital Park Commission was established as an independent executive agency charged with oversight and development of federal property within the National Capital Region. In 1952, this evolved into the National Capital Planning Commission, which served as the de facto planning organization for the District before the Home Rule Act of 1973. Today, NCPC is responsible for the Federal Elements of the Comprehensive Plan for the National Capital, and has final approval power over the District Elements (and therefore the entire Comprehensive Plan). The Commission also has approval authority over all projects on federal land in the District and transfers of jurisdiction between a federal agency and a District agency.

NCPC consists of 12 total members: three presidential appointees, five ex officio members from federal agencies and two from the District, and two mayoral appointees. NCPC provides overall planning guidance for federal land and buildings in the region by reviewing the design of federal and certain local projects, overseeing long-range planning for future development, and monitoring capital investment by federal agencies. In addition to these entities, planning and development in the District often involves other federal, regional and local agencies that review projects based on different authorities and scope and location of the project. Such agencies may include: the U.S. Army Corps of Engineers; the Federal Highway Administration; and the National Capital Memorial Advisory Commission.



BOOK HILL PARK (DPR SITE)


DPR PLAYGROUND AT 9TH & PENN

How Local Parks are Managed in a Federal District

As DC's local parks and recreation agency, DPR manages greenspace, operates recreational facilities, administers recreational programming, and promotes citywide health and wellness initiatives. In addition to offering over 400 types of events and programs annually, DPR also owns and manages 104 playgrounds, 78 recreation centers, 38 community gardens, 35 pools, 36 spray parks and 370 fields and courts. Because DPR emerged when NPS already owned all of the parks in the District, DPR's resources are heavily focused on recreational programs rather than greenspace management, as is evidenced by its recreation-oriented mission statement. Unlike other major cities with comparable parks acreage, DPR does not have a division devoted to environmental management. Instead, a combination of other agencies such as DOEE, DDOT, and the DC Department of General Services (DGS) provide environmental management services.

Even for recreational facilities, DPR does not control its own maintenance or maintenance budget. The majority of DPR's budget, which comes from local tax revenue, permitting fees, and municipal bonds, is directed toward recreation program staff and long-term capital investments. Unlike most local parks and recreation agencies, DPR does not use its own operating funds to maintain its facilities. Instead, maintenance of DPR facilities is managed by DGS. Some DGS funds are dedicated to DPR projects, but maintenance budgets are not allocated by site. When the public interacts with DPR officials through programming or capital planning, these officials cannot act on resident requests for improved maintenance, but only pass along the requests to DGS. DGS officials, meanwhile, are not in contact with residents.

DC Department of Parks & Recreation, Hold the Parks

Due to its history and portfolio, the District's DPR is set up to manage recreation, not parks. This is distinct from sister cities. For example:

- The Baltimore Department of Parks and Recreation divides parks and recreation into two separate bureaus and also includes a Forestry Division and Horticultural Division.
- The Philadelphia Department of Parks and Recreation's executive leadership team includes a Deputy Commissioner of Natural Lands Management.
- The Minneapolis Department of Parks and Recreation has an Environmental Stewardship Division which divides environmental management and forestry into their own sub-departments.

DPR Mission Statement:
"DPR's mission is to provide equitable access to Gold Standard recreational programs, services and facilities—across all 8 Wards."



CARTER BARRON AMPHITHEATRE

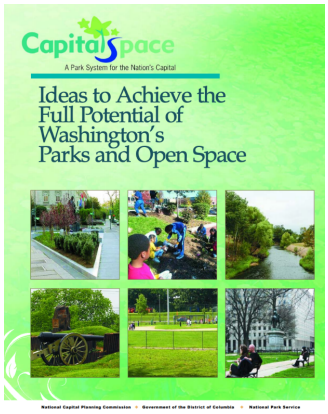
The Future of DC Parks: Land with No Vision & A Vision with No Land

Because of its fractured history, the District's park system is divided between jurisdictions with differing missions, priorities, and resources. As a result, the park system is not managed with a cohesive vision. Each NPS superintendency manages immediate needs as it can, and there is no master plan for the National Capital Region. The District DPR has a master plan for meeting the recreational needs of its residents, but controls only a small fraction of the city's greenspace.

While there is no one plan that encompasses the full park system, NPS, DPR, and others have issued numerous plans and initiatives that are relevant to maximizing the potential of the District's park system. Though varied in scope and target areas, these plans all recognize the importance of urban greenspace for health and equity. This report is intended to build on these plans and provide recommendations for how their goals can be realized.

The section below describes six major public-facing parks planning documents that have been developed over the past decade by federal and local entities—with varying degrees of public engagement and implementation

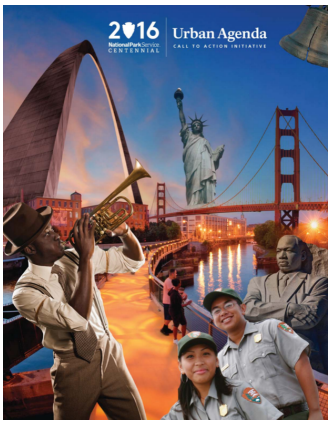
CapitalSpace Initiative (2010) - NCPC, NPS, DPR, and others



The CapitalSpace Initiative was a collaborative effort between NCPC, NPS, and several agencies within the District's government, including DPR and the Office of Planning. The first comprehensive DC parks project in nearly forty years, CapitalSpace set out to assess Washington's parks and open spaces, develop strategies for realizing the system's full potential, and develop a road map for collaborating on opportunities across jurisdictional lines. The CapitalSpace report was issued following two years of regular meetings. The report addressed the need to increase access to local parks by providing a safe and accessible green network to open spaces, trails, parkways, as well as recreation nearby and across neighborhoods and the city. CapitalSpace also would expand the park system's capacity to meet the community needs of today and tomorrow while protecting and restoring natural resources. The report recognized that more coordinated management across jurisdictions is necessary to improve and maintain parks to meet the needs of residents. The report does not include any specific implementation plan or accountability measures, and there has been no record of any action taken on its recommendations following a short progress report released in 2012.

There is currently no dedicated funding in place to implement the goals of the CapitalSpace Initiative.

Urban Agenda Initiative (2016) - NPS



The majority of NPS's assets nationwide are large natural resources, but it does own a small number of parks in other cities in addition to its parks in Washington, DC. In 2015, NPS took steps to recognize its urban parks as a distinct and "essential component of the national park system" which required new approaches "beyond the traditional experiences born of the large western landscapes" by establishing an "Urban Agenda" Initiative. This Initiative recognizes the challenges presented by urban parks that the agency is not structured to face, such as "higher density and more diverse population, lands that often have past industrial or disturbance legacies, and a complex set of overlapping jurisdictions." The Urban Agenda aims to increase NPS's relevancy to urban residents through community engagement, expanded partnership opportunities, and improving internal collaboration within their own siloed structure.

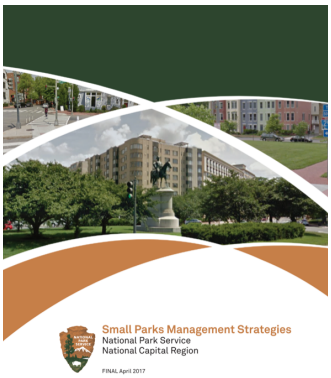
These laudable goals are aligned with our recommendations for the District's park system, but there is not a current effort (or funding support) to implement them.

The Short-Lived Urban Fellowship

As part of the Urban Agenda Initiative, the NPS National Capital Region hired an Urban Fellow for a 2015-2017 Pilot Program. The goal of the fellowship was to connect existing NPS infrastructure with underserved communities in Southeast DC, specifically Wards 7 and 8. The Urban Fellow mainly focused on Shepherd Parkway due to its safety issues such as illegal dumping and dangerous street design. During this time, NPS began but did not complete a Rapid Ethnographic Assessment Project (REAP) of the surrounding community. NPS also added wayfinding and interpretative signs to Shepherd Parkway. The fellow issued a short Urban Agenda Report for DC that concluded that NPS needs to strengthen community relationships and provide equitable allocation of funding, time, and resources.

Since the fellow's departure, no significant progress on her recommendations has been reported. This is an example of how NPS's lack of staffing and resources prolongs planning and development, making long-term change difficult for the agency.

Small Parks Management Strategies (2017) - NPS



NPS's National Capital Region portfolio includes 292 small parks, defined as a park between 0.0045 and 7 acres in size. While NPS values small parks as a critical component of the L'Enfant Plan and the historic design framework of the District, because the small parks are scattered across different superintendencies and are often underprioritized compared to the major parks in NPS's portfolio, the agency finds these parks difficult to manage. The Small Parks Management Strategy sets out a management plan for its small parks. NPS evaluated all of its small parks for ability to convey the NPS park purpose and support the NPS identity through cultural, historical and natural significance. The low-scoring parks would be considered for CMAs, TOJs, or transfer of ownership to the District. The Strategy describes this evaluation but does not provide the individual park scores. In the published report, NPS also conveyed interest in expanding funding opportunities, standardizing and simplifying partnership agreements and improving data management.

Since publication, no significant progress has been made on its objectives, and we were unable to establish whether any collaboration has occurred between NPS and the District on implementing its recommended transfers of small parks.

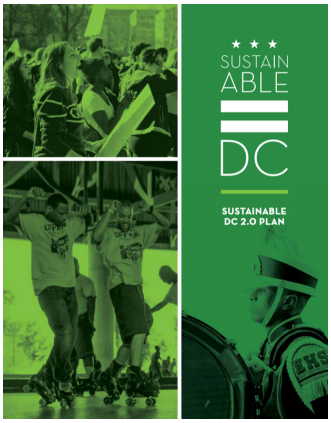
Healthy Parks Healthy People (2018-2023) - NPS



Healthy Parks Healthy People (HPHP) is a global movement adopted and integrated by NPS in 2011 through their Office of Public Health. NPS's five-year HPHP strategic plan recognizes parks as vital health resources that have the power to bring lasting change for the American public. Individual NPS superintendencies and parks are encouraged to implement public health principles to fit their park's resources, needs and capabilities.

The Plan encourages NPS staff to work toward making a healthy park experience easier, more desirable, and relatable to all people. The National Capital Region has not reported any implementation of Healthy Parks Healthy People. Because NPS is underfunded and understaffed, the lack of accountability measures and specific implementation support likely undercut progress toward HPHP's goals.

Sustainable DC 2.0 (2019) - District-wide



Sustainable DC 2.0 is the plan for making the District the healthiest, greenest, most livable city for all District residents. Sustainable DC 2.0 was issued in 2019 and contains several priorities related to the District's greenspace.

The Plan aims to protect and restore the District's natural environment and improve access to high-quality greenspaces such as trails and parks, providing benefits for health and the environment. These goals include incorporating access to nature in the places we live, work, and play. Specifically, the Plan sets a tree canopy goal of achieving a 40% tree canopy cover by 2032 to address the heat island effect caused by climate change, and to incorporate biodiversity and the use of native plants in green infrastructure on District government land. The Plan also aims to increase equitable access to greenspace and parks by creating or improving small parks and natural spaces in underserved areas that currently lack access to these resources.

DPR Ready2Play Master Plan (2023) - DPR



DPR is currently in the process of finalizing its new 20-year Master Plan, titled "Ready2Play." Ready2Play is an "ambitious, people-centered proposal" for the District's parks and recreation system. The Plan is focused on addressing current inequities in the park system through investment and operations. The Ready2Play Plan is based on years of engagement with the community; DPR engaged thousands of residents through surveys, and virtual and in-person meetings.

Ready2Play aims to create a cohesive and unified park system, and includes several action items related to our goals for activation, equity, and health. For example, Ready2Play aims to provide accessible and safe connections to and through parks, promote climate-resilient and environmentally sustainable parks and recreational facilities that provide safe, accessible, and inclusive connection to nature and recreation, and expand wellness programs and facilities to help residents adopt healthy habits to improve physical and mental health.

Recognizing the important role that NPS land plays in meeting these goals, the Plan also states an intention to pursue new cooperative management agreements and/or transfers of jurisdiction with NPS to expand access to recreational amenities and meet the needs of District residents. The Plan includes a detailed implementation plan with a timeline and metrics.



MERIDIAN HILL/MALCOLM X PARK

Challenges:

Why DC's Park System Is Not Yet Meeting Its Full Potential

NPS, DPR, and District residents have grand hopes for the District's park system. Progress on these plans has been halting and slow, in part due to jurisdictional challenges and funding limitations, and the District's park system remains one of great unrealized potential. As previously stated, the Trust for Public Land has ranked the District as the number one urban park system in the United States based on several criteria, including park equity, access, investment, amenities, and total acreage.

But this score overlooks the fact that many of the District's parks are inactivated and poorly maintained. In other cities, when government services are deficient, clear blame can be placed on the local government. In this case, however, control of the park system is divided between jurisdictions with differing priorities and abilities—jurisdictions that often are not communicating and lack mechanisms to hold each other accountable. In our research, we identified several key challenges that hinder activation of the District's greenspace. Many of these challenges are interconnected, but fall into the loose categories of mission conflict, jurisdictional confusion, funding limitations, vision and coordination, communication and accountability, and policies and procedures. Together, these barriers hinder the District's ability to create an equitable, well-integrated, and activated park system that promotes health for all DC residents.

Other Cities Prioritize People in their Park Planning

San Francisco, CA – Ranked #7 by ParkScore
The San Francisco Recreation and Park Department's Mission is to provide enriching recreational activities, maintain beautiful parks and preserve the environment for the well-being of everyone in our diverse community.

Cincinnati, OH – Ranked #4 by ParkScore
The mission of the Cincinnati Park Board is to conserve, manage, sustain, and enhance parks' natural and cultural resources and public greenspace for the enjoyment, enlightenment and enrichment of the Cincinnati community.

St. Petersburg, FL – Ranked #14 by ParkScore
It is our mission as a department to preserve, protect, maintain and enhance the city's parklands and recreational facilities and engage people in leisure activities that contribute to their quality of life.

Mission Conflict

NPS is Charged with Preserving Spaces, Not Activating Them

Due to a quirk of history, the vast majority of the District's urban green space is owned by a federal agency that is primarily focused on wilderness preservation at large uninhabited national parks across the country. Many issues arise out of the fact that NPS's mission, to "preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations," is often at odds with efforts to activate the District's urban greenspace. While NPS's mission maps comfortably onto more traditional parks like nearby Shenandoah National Park, it often puts the Park Service at odds with the District residents who live among and want to *use* their spaces. Many park advocates report that NPS appears to prioritize preservation of spaces rather than activation of spaces for use by the public (despite "enjoyment" being the first of three goals in its mission statement). Some residents feel that NPS goes beyond this mandate by managing its parks to be enjoyed by neither the current nor future generations by making them inaccessible or inhospitable.

> Some residents feel that NPS goes beyond this mandate by managing its parks to be enjoyed by neither the current nor future generations by making them inaccessible or inhospitable

In the words of one interviewee, "the mindset of NPS is that we have to preserve. Preserve for what I don't know." Others describe NPS as being more interested in the parks than in the people who use them. This perception is consistent with what we heard from the agency: many at NPS describe their agency as being in the "forever business," which requires it to curb current use to ensure that parks can be enjoyed by future generations. People who work with NPS shared that the agency frequently rejects design and activation ideas for NPS parks because they might bring too many people into the park and "overtax the resource." This focus on preservation hinders the District's ability to create vibrant, active spaces that recognize how parks are actually being used. NPS's stated priorities reflect its preservation mission over urban use. For example, in its Small Parks Study, issued in 2017, NPS evaluated the 292 small parks in its portfolio to determine how they align with NPS's mission. The most mission-aligned parks were ones with resources listed on the National Register of Historic Places or located within a historic district, or that include existing memorials or monuments, suggesting that NPS prioritizes historic or cultural resources over locally facing recreational functions. Similarly, NPS staff indicated that agency priorities begin with the "significance of the resource," meaning its historic or cultural value. Visitor experience, while considered, is a lower priority, and frequently focused on the experience of tourists rather than local residents. This prioritization is key because it determines how NPS chooses to direct its funding and attention across its District portfolio. NPS's preservation-focused mission means that turning open spaces into activated parks is not high on NPS's priority list.



LINCOLN PARK

With No Official Dog Park, Everywhere is a Dog Park

At seven acres, Lincoln Park is the largest park in Capitol Hill and serves as a prime recreation space for the surrounding community. Dogs and their owners are a major presence in the park. NPS prohibits off-leash dogs, but is also opposed to building dog parks on its properties. As a result, dog owners use the whole park, destroying the grass and making the park feel unsafe or unusable to other users. This example shows how preservation above all alternative uses can actually be counter-productive to the Park Service's interest in preserving its spaces—and in enforcing its own policies.



LINCOLN PARK

NPS's Priorities Conflict with What the District Wants and Needs

NPS's mission conflicts with the priorities of District residents and with the District government's mission (as described in the Comprehensive Plan) to preserve and enhance parks and open spaces to meet the recreational needs of its residents. In practice, NPS's focus on preservation makes it difficult for DPR and District residents to use District greenspace to meet community needs. NPS is opposed to providing common urban park amenities such as playgrounds, community gardens, and dog parks, and has even declined to pursue projects that would appear to align with NPS's mission, such as nature trails and accessible natural areas, which are some of the most requested amenities in the Ready2Play Plan. Park activists have long sought construction of new trails in the large forested parks east of the Anacostia River, many of which currently lack accessible ways to enter and use the park, but no new trails have been built in NPS parks in decades.

> Park activists have long sought construction of new trails in the large forested parks east of the Anacostia River, many of which currently lack accessible ways to enter and use the park

These decisions are driven in part by NPS's lack of capacity to maintain amenities, but it also reflects the fact that the agency does not prioritize the preferences and needs of local residents.

Rather than planning around community needs, NPS often plans for parks, especially in neighborhoods near the downtown core, to one day hold memorials. Even if there are no near-term plans to locate a memorial in a park, NPS is often reluctant to program the park to meet local needs lest its use conflicts with a future memorial. When a memorial is built, usability of the space by children having fun or workers eating lunch is not a design priority.

NPS's preservation mission often leads the agency to make decisions specifically to dissuade recreational use by local residents. A prominent example occurred in 2017 when, citing field restoration and maintenance concerns, NPS issued a proposal to ban all recreational sports around the Washington Monument grounds of the National Mall. After significant public backlash, including an online petition that garnered over 14,000 signatures, NPS withdrew its proposal. More recently, NPS explicitly proposed to curb recreational use of Rock Creek Park by reopening Beach Drive to traffic. Beach Drive is a north-south roadway through Rock Creek Park that has historically been used as a high-speed commuting route. Amid the COVID-19 pandemic, NPS agreed to close Beach Drive to traffic (or, as non-motorized users put it, "open the road to people"). In 2022, in its first proposal regarding permanent access to Beach Drive, NPS proposed returning the road to exclusive car use during the majority of the year because it would dissuade off-trail use by hikers, arguing that allowing 5,000 cars to drive through the park daily would improve forest health and protect endangered species. As noted in the thousands of comments opposing this decision, this proposal reflected a bias against actual users of the park. In the words of one commenter, "Just to make sure I understand, you want less (sic) people using the park, so you're trying to make the park worse so less people will come?"

> "Just to make sure I understand, you want less people using the park, so you're trying to make the park worse so less people will come?"

NPS ultimately revised its 2022 proposal to keep portions of Beach Drive closed year-round, belatedly recognizing the value of designating the space for recreational use. While its final decisions in this case and the Washington Monument case reflected the preferences of local residents, these were high profile incidents that received significant public attention and media coverage. In most cases, NPS's final decision has favored preservation over current community needs. This mission conflict also has implications for programming and use of parks, in addition to planning and infrastructure. As will be discussed in more detail, NPS regulations and policies prohibit many community uses of parks.

NPS's History and Mission are a Poor Fit for Managing Urban Parks

Due to its focus on preservation, NPS does not have a history of overseeing lively urban spaces. While NPS does have other urban parks in its national portfolio, the agency's ownership of the District's (nearly) entire park system is unique, and NPS has struggled to keep up with the open space needs of the area's growing population. As previously noted, NPS is resistant to building amenities common to urban parks such as playgrounds, dog parks, and other infrastructure to meet the needs of District residents.

> NPS is resistant to building amenities common to urban parks such as playgrounds, dog parks, and other infrastructure

The agency operates on a slow-moving timeline incompatible with the fast-changing needs of an urban environment. It does not devote staff or resources to urban uses of its parks, such as recreational programming. It also often struggles with challenges that exist in an urban context. For example, in the District, NPS has received criticism for ejecting people experiencing homelessness from their parks. Since the pandemic, NPS has closed off several downtown parks entirely to keep out encampments. This report does not provide recommendations on this issue, but notes it as an example of an issue in urban parks that NPS has struggled to address. To its credit, NPS's now-defunct Urban Agenda recognized that urban parks face needs and challenges that the agency is not well structured to address, including higher density and more diverse populations. However, efforts to take on these challenges under the Urban Agenda languished under the Trump Administration and have not been revived.



MCPHERSON SQUARE PARK

Lack of DC Statehood Harms People and Parks

In 1802, the federal government incorporated the city of Washington, DC, eliminating the Commissioner governing structure and providing citizens with a greater voice in local affairs. However, it was not until 1973 that the Home Rule Act empowered District residents to elect its own mayor and legislature.

Today, the District government broadly operates as a state: the District balances a multi-billion dollar budget, the Mayor appoints directors to District agencies, including the Department of Parks and Recreation, while the DC Council confirms appointees and conducts regular oversight. However, the self-governing District is still ultimately vulnerable to regular interference by members of Congress, despite paying more federal taxes per capita than any state, having a larger population than either Vermont or Wyoming, and maintaining a higher bond rating than 35 other states. This denial of voting representation for the citizens of a nation's capital city is unique among developed countries. Congress has final approval over DC's budget and can nullify, attach riders to, or repeal any legislation passed by the elected DC Council—a degree of federal interference that would be unconscionable among any of the other 50 states. While residents have repeatedly elected Delegate Eleanor Holmes Norton to represent the District in the House of Representatives, she cannot vote in the national legislature.

This disenfranchisement undeniably harms local residents, but it also harms the local park system as the Delegate's ability to hold NPS accountable is severely limited in comparison to her voting Congressional colleagues.



SOAPSTONE VALLEY


TILDEN STREET NW

Jurisdictional Confusion

Unclear Boundaries Between NPS and District Land Confuse Policymakers and Residents

The uniquely interlocking, and often changing, boundaries of NPS and District land create confusion and difficulties in managing and activating the District's greenspace. Not only are lands divided between NPS and the District, but NPS lands are further divided among multiple operational boundaries, all with different priorities and policies.

To this day, neither the District nor NPS is entirely certain about what properties are in their respective portfolios and they sometimes disagree on these boundaries. For example, there are two "Oxon Run" parks in Ward 8 along the District-Maryland border. They are divided by jurisdiction into Oxon Run Parkway (NPS - NACE) and Oxon Run Park (DPR). The exact location of this jurisdictional line remains unclear, despite community efforts to obtain this information from NPS and DPR. These jurisdictional uncertainties exist across the city and are confusing for residents, the District government, and NPS. In addition, they make it hard for everyone to work together to strengthen the overall park system because it is often difficult to establish who is in charge.

The jurisdictional confusion is caused in part by the non-standardized use of Transfers of Jurisdiction (TOJ), which grant the District authority to administer, maintain, and manage property while NPS retains ownership. Such transfers have occurred over the years, but they have been one-offs and the information on executed TOJs is not standardized. In fact, it appears that NPS and the District may not have the same TOJ records, leading to inconsistencies in mapping and uncertainties regarding who has responsibility for what. This uncertainty can hinder maintenance as well as proactive improvement of properties. As NPS notes in the Small Parks Plan, the District's multi-jurisdictional management structure "makes it difficult for community users to know who to turn to when maintenance is needed or when there is an interest in the community to fix up a park."

For example, one park user described a complication with a trail in Rock Creek Park that dead-ends at a road with no sidewalks, in a location where it is unsafe to cross the road to another trail entrance. Park users identified this as a safety concern and asked for installation of "Pedestrian Crossing" signs to flag the issue for passing motorists. However, no one knew who was responsible for the road, so the signs were not installed.

Multiple Superintendencies Confuse District Residents and Impede Progress

In addition to the unclear boundaries between NPS and the District, NPS's multiple operational units present additional difficulties. NPS operates under six different "superintendencies" in the District, each of which has its own superintendent making decisions, and its own set of policies that sometimes conflict with one another. This structure is confusing to residents and local policymakers, few of whom are aware of the system, and makes it difficult to identify the key decisionmaker on a given issue. NPS concedes that this structure has led to difficulties in DC, noting in its Urban Agenda report for Washington, DC , that the divisions among NPS operational boundaries "impede collaboration and spread and implementation of innovative best practices."

In addition to impeding collaboration, the multiple superintendencies make it difficult for NPS to pursue its own goals under plans developed by the National Capital Region, such as CapitalSpace and the Small Parks Plan. This is because decisions about parks within superintendencies are made by superintendents, some of whom are not even located in DC, based on their own priorities and perceived needs, that may not always align with each other or with the staff at the regional office.



A TRIANGLE PARK IN NE

Residents Lack Information About Jurisdictional Boundaries

Due to the jurisdictional confusion, residents often do not know whether a local park is under NPS or District control. Because there is little coordinated, easily available information about the park system, many park resources are unknown to the public.

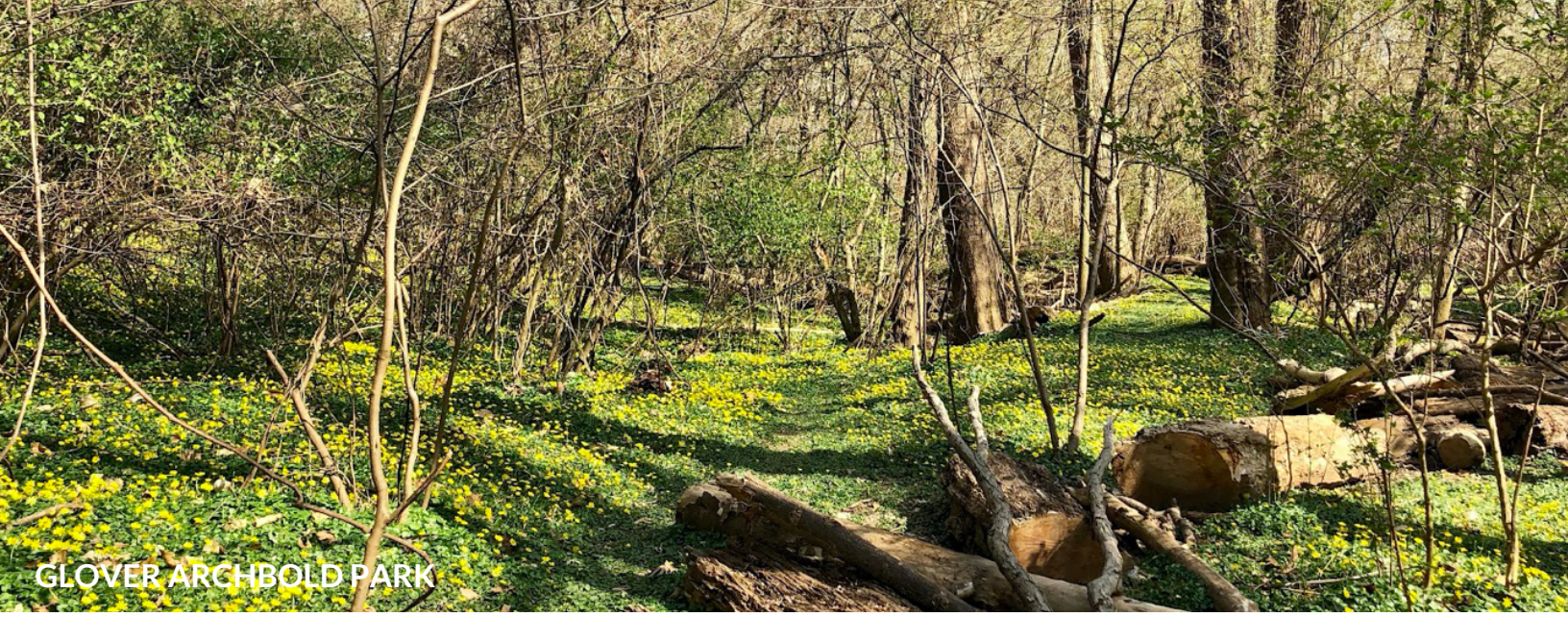
Most NPS parks in the District lack signage or identifying information linking NPS to the property. As a result, residents do not know that NPS is the entity they should target with requests or complaints. Even NPS recognizes this problem, as several of its plans recommend adding or improving signage, though the agency concedes that installing signage at all of its small parks is unlikely.

In response to a request from Delegate Norton, NPS now provides an interactive map of their DC parks on their website to help residents identify NPS parks in the District and link them to the appropriate superintendency. However, this map is not user friendly. Individual parks link to superintendency websites without explaining what this means. Thus, someone clicking on Meridian Hill (aka Malcolm X) Park on the map is redirected to the Rock Creek Park website —which would likely read as an error to anyone without preexisting familiarity with NPS's operational units. Second, the map does not include District-run parks or parks run by other federal agencies as labeled entities, so it does not function as a comprehensive parks directory. Finally, it remains unclear whether this map has the correct jurisdictional boundaries: the information for some assets changed over the course of 2022 without explanation.

Parks as Environmental Powerhouses

Park and greenspace management and planning provide specific ecosystem services to promote ecosystem functioning in urban areas. Some, such as carbon sequestration, are even considered an economic boon (Vieira 2018). One study calculated the monetary value of carbon sequestration from trees in urban parks to be $263 per hectare, concluding that urban greenspaces have higher economic value per hectare than non-urban forested land (Nikodinoska et al., 2018).

These benefits greatly depend on the size and type of greenspace. Therefore, ensuring that greenspace is planned, diverse, and healthy is essential (Reis & Lopes, 2019); Nero et al., 2017; Baró et al., 2014; Vieira, 2018). For example, in Ghana, the spaces with the highest carbon storage were those with large native trees and diverse native tree species composition, such as natural forests (Nero et al., 2017). People also have an important role to play in protecting natural ecosystem services. Greenspaces can improve pro-environmental behaviors by increasing cooperation, especially by exposing children to nature, which can lead to enhanced adult environmentalism (WHO 2016). See Appendix B for additional examples of the environmental impacts of parks.



GLOVER ARCHBOLD PARK

Funding Constraints

NPS Does Not Have Adequate Funding to Manage its Assets in the District of Columbia

A major limitation driving many of the issues with NPS parks in the District is funding. NPS has billions of dollars in deferred maintenance across the District of Columbia. An estimate by the Department of the Interior puts the total costs at $1,855,689,000, while others we spoke to believed the figure was four times higher than that. When compared to the estimates for all US states, NPS parks in DC have the third highest deferred maintenance costs. Only New York and California have higher deferred maintenance costs and they both contain NPS parks spanning millions of acres.

> Compared to the estimates for all US states, NPS parks in DC have the third highest deferred maintenance costs

As an agency, NPS has limited funds to maintain its current spaces and no guaranteed funds to design, construct, maintain, or operate new facilities or infrastructure. Until late 2022, Congress had not increased NPS's funding since 2012 and 90% of NPS's local budget goes to staffing. Because the budget has not been increased in ten years, staffing levels are also low, which further limits NPS's ability to effectively manage its portfolio, which includes assets as vast and diverse as Yellowstone National Park in Montana, Pearl Harbor National Memorial in Hawaii—and hundreds of small circles, squares, and triangles in the District of Columbia.

NPS's annual base funds cover personnel, custodial services, and contracts for small projects, but funds are insufficient to reliably cover basic maintenance needs like broken water fountains, benches, and lights. Instead, superintendencies must seek additional funding for projects and maintenance on a competitive basis *across the entirety of the National Park Service*. This means that when a superintendency needs funding for something as simple as park bench repair, it must apply for extra funding through a centralized process, putting them in competition with the Pearl Harbor Memorial and Yellowstone. Realistically speaking, the District's total maintenance needs will never be funded through NPS, so the superintendencies must prioritize and respond to immediate needs as they seek centralized funding. Not only does this mean many projects will never be funded, but it also means that delays are unavoidable for the ones that are funded. Because NPS operates on five-year funding cycles, even simple projects often take years to complete. When we asked about current maintenance needs, we heard repeatedly that the next budget request submission is in 2025. For the same reason, NPS often relies on outside partnerships, donations, and District funding for maintenance and new projects. However, as noted later on, none of these outside funding avenues are straightforward and they can create significant equity concerns.

This lack of funding also underpins many of the other challenges described in this report. NPS does not have the capacity and resources to think "big picture," and instead must focus on putting out (proverbial) fires and addressing immediate maintenance and operational needs (and often just a small fraction of these). NPS does not have the staffing capacity to engage in the outreach and engagement needed to build strong connections with the community. NPS lacks the resources to update its platforms and systems for permits and programming.



ANACOSTIA PARK

Source: Ward 8 Woods

Funding Gaps Hinder Maintenance, Activation, and Park Use

NPS's funding gap leads to a number of adverse consequences. Community members report problems with NPS properties due to lack of maintenance funding, including broken infrastructure (such as benches, water fountains, and streetlights) and illegal dumping. The five-year funding cycle means that disrepair is prolonged. For example, in October 2021, a person crashed a car into a lamppost in Sherman Circle in Petworth. NPS cleared the debris the next day, but the lamp post was not replaced until April 2023—18 months later. Carter Barron Amphitheater, located in Rock Creek Park, has been closed since 2017, when an inspection found it was not structurally sound and would require a multimillion dollar renovation to make it safe for use. While plans are now underway for a nonprofit partner to support the renovation, this process is likely to take years; in the meantime, "[the] passerby will see much of the theater's concrete covered in graffiti tags, and peeling paint on the wood beams and surface of the stage."

As noted in the CapitalSpace Plan, these maintenance gaps directly affect perception and use of a park. "Poor maintenance at park edges, trash or overgrown vegetation, lack of signage, evidence of vandalism and vagrancy, and real and perceived concerns about crime can contribute to parks being viewed as less secure and uninviting."

In addition to limiting current maintenance, this funding gap prevents investment in new infrastructure and facilities, even when outside funding is available. This is due to the valid concern that NPS will not have sufficient funding to maintain new resources in the future. For example, one interviewee stated that NPS declined to install new benches with outside funding because it would not have the money to maintain them over their 20-year lifespan. Another interviewee said that outside groups must always propose temporary programming that does not commit NPS to sustained change or costs. These concerns also contribute to the agency's unwillingness to install new playgrounds, trails, and bathroom facilities.

Many interviewees noted ways that limited funding has hindered activation of the greenspace in the District, resulting in hundreds of sites without facilities, "so much potential that is not utilized." NPS's funding constraints also make long-term planning difficult, further preventing site activation. For example, NPS has long been at work on an overhaul of Anacostia Park, located in NACE. NPS created a draft master plan by 2004 and issued a final master plan in 2017. However, the master plan has no timeline for implementation, nor does it have funding for any of its recommendations. In 2021, NPS began a new effort to "Reimagine Anacostia Park," building on the 2017 Management Plan. This means that twenty years after the planning process began, the process is still ongoing without any guarantee of project funding. In addition to preventing activation, NPS's funding restrictions also mean that the agency does not even have the resources to actively conserve many of its spaces—even when conservation is central to its mission. The District's Department of Energy & Environment (DOEE) funds and manages stream restoration and other conservation projects in the District, and despite NPS's ownership of the majority of the District's large forested parks the agency does not appear to have a forest management strategy.

Funding Gaps Drive Park Inequities Across the District

Funding constraints drive inequities across neighborhoods in a number of ways. First, the NPS park budgets are based in part on visitation, meaning that the neighborhood parks in NACE (which covers the eastern side of the city) receive far less funding per acre ($1,326) than the National Mall ($109,685) or even Rock Creek ($5,956). This means that greater funding is available for NPS parks that serve tourists compared to parks that are more locally oriented. It also means that NPS resources are more limited for parks in Wards 5, 7, and 8, where, due to the District's history of redlining and housing segregation, more communities of color and communities with low income are located. These funding inequities are a self-perpetuating problem, because NACE does not have the resources to build amenities and activate spaces to increase visitation and thereby increase its own funding.

As a result of these inequities, maintenance gaps are more common in parks in neighborhoods with lower income levels. A professor of physical therapy at the George Washington University had her students complete quality surveys for parks across the District. They found that neighborhoods with higher income had greater access to parks, characterized by regularly cut grass, more visible and accurate signage, community knowledge of where the park is and how to access it, well-kept playgrounds, minimal trash overflow, and limited activities discouraging others from access.

Residents also point out the difference between forested parks east of the Anacostia River with Rock Creek Park, located adjacent to wealthy Ward 3. Parks east of the river face persistent illegal dumping, litter and debris carried downstream from other points, and lack trail markings and signage indicating entrance points, leaving residents (*cont.*)



HATTIE SEWELL'S PEIRCE MILL TEA HOUSE

Source: Friends of Peirce Mill

A Disservice to Chocolate City

The District of Columbia has long been referred to as "Chocolate City" in a reflection of its strong Black community. Unfortunately, a long history of racist policies, disenfranchisement, and outside control over the District has resulted in deep racial inequities that persist across Ward and neighborhood boundaries. These inequities have resulted in extreme health disparities, a growing wealth gap, and, as noted by several interviewees, inequitable investments across the park system.

The Health Equity Report: District of Columbia 2018 highlights our disparities in park access, pointing out that the Trust for Public Land's 2017 analysis showed reduced access for District residents earning less than 75% of the median city income. The Health Equity Report (HER) also includes a Parkland Vision map identifying areas in DC where parkland is most needed as well as NPS parkland that is of interest to DPR. Much of the identified land is in Wards 5, 7, and 8, for which the HER also reported have the highest percentages of Black residents, the highest rates of adult physical inactivity and the highest age-adjusted mortality rates for heart disease. Based on social and economic indicators such as asthma rates and population distribution by age, the HER also reported Wards 7 and 8 as "registering the highest concentration of vulnerabilities" to climate change. This illustrates the importance of increasing access to well-maintained greenspaces providing not only direct health benefits such as physical activity but also ecosystem services, heat protection, stormwater management and other climate resiliency benefits.

unable to enter or completely unaware the parkway and its trails are accessible. By contrast, Rock Creek Park, which NPS describes as "a gem in our nation's capital," contains 32 miles of well-marked trails for walkers, hikers, bikers, and even horse-riders—although, as discussed above, Rock Creek Park has many of its own access challenges and resident frustrations. Ward 8 residents have rightfully recognized that the stark contrast between the state of the hundreds of acres of forested land in Ward 7 and 8 and NPS's so-called "gem" in Wards 3 and 4 constitutes environmental racism, stating that both the local and federal governments have "abandoned" their land.

NPS's reliance on outside partnerships further exacerbates these inequities. When NPS cannot fund maintenance or projects, it often relies on partnerships and donations. The most common partnership is with a Friends group, a philanthropic organization created specifically to carry out projects and programs with an affiliated park. Forming and sustaining a Friends group is a significant undertaking that requires sustained financial and time resources from a community to be successful.

> Forming and sustaining a Friends group is a significant undertaking that requires sustained financial & time resources from a community

NPS's *Making Friends*, a guide to forming NPS Friends groups, is over 120 pages long. These investment barriers means that park maintenance and activation is often directly tied to the resources of the surrounding community, putting communities with lower income at a disadvantage. One of the reasons Rock Creek Park is comparatively well resourced, in addition to its higher allocated level of federal funding, is that it is supported by the Rock Creek Conservancy, Rock Creek Park's official philanthropic partner, which, according to its website and nonprofit filings, has an annual budget of nearly $1 million, supports a staff of 14, and organized 250 volunteer events in the park in 2021 alone.

The neighborhood burden of supporting a park is a concern that DPR heard frequently from residents in its Master Planning process. One organization, Green Spaces for DC, was specifically established to provide seed money and resources for communities looking to establish a Friends group, but they themselves are underesourced. Business Improvement Districts (BIDs) also play an important supporting role in maintaining public spaces, but they are located primarily in well-resourced neighborhoods.

Complex and Outdated Policies and Procedures Hinder Outside Investment in NPS Parks

NPS frequently relies on donations and partnerships to supplement its limited budget; however, neither process is straightforward. NPS is not authorized to solicit donations. It cannot accept credit cards and has no donation button on its website. As a result, even community organizations that are ready and willing to provide financial support state, "it has never felt as easy as, write a check for $20,000 and we can fix the benches." Similarly, as noted above, community groups find it daunting to form partnerships with NPS as such partnerships are governed by complex legal agreements and often require significant community engagement and resources. NPS often works with the District government to fill funding gaps,



SOAPSTONE VALLEY TRAIL

but this process is also complicated. The District of Columbia does not face the same funding constraints as NPS and has demonstrated an interest in investing in greenspace, including through cooperative management agreements like Franklin Park and sustainability projects run through DOEE. At the same time, the District is understandably reluctant to devote major resources to projects on properties it does not control, that will require significant federal oversight (by an understaffed agency), and come with very long timelines. As discussed in more detail later on, a lack of planning, coordination, and communication currently hinders many of these opportunities for collaboration between NPS and the District.

NPS Ownership of Local Parks Limits the District's Access to Federal Resources

Somewhat ironically, NPS's ownership of the majority of the District's park system limits access to federal funding for these parks. Because the District's parks are federally owned, they are ineligible for federal funds that are available to state and locally run parks. For example, the Land and Water Conservation Fund (LWCF) directs revenues from offshore oil and gas drilling toward land and water conservation, including matching grants for state and local parks and recreation projects. Currently, LWCF state allocations are determined by a formula based on census populations. The District cannot spend LWCF on property managed by NPS, so federal parkland in dire need of improvements misses out on this funding.

Similarly, the Outdoor Recreation Legacy Partnership Program (ORLP) provides grant funding to urban parks, prioritizing projects in economically disadvantaged areas. In 2022, the Biden Administration announced a $150 million investment in ORLP grant funding as part of its "America the Beautiful" initiative to support conservation and restoration efforts that address the climate crisis and improve equitable access to the outdoors, specifically tied to a commitment to provide safe outdoor spaces for communities that are park-deprived. This pot of money is also not available for NPS projects. It is possible that the District could apply for ORLP grant funding for a project on NPS land, but under current conditions, it would be extremely difficult to coordinate such an application. NPS also operates a Rivers, Trails, and Conservation Assistance (RTCA) program that provides technical assistance to communities and public land managers in developing or restoring parks and creating outdoor recreation opportunities. But like ORLP, this program targets state and local parks, not federal land.



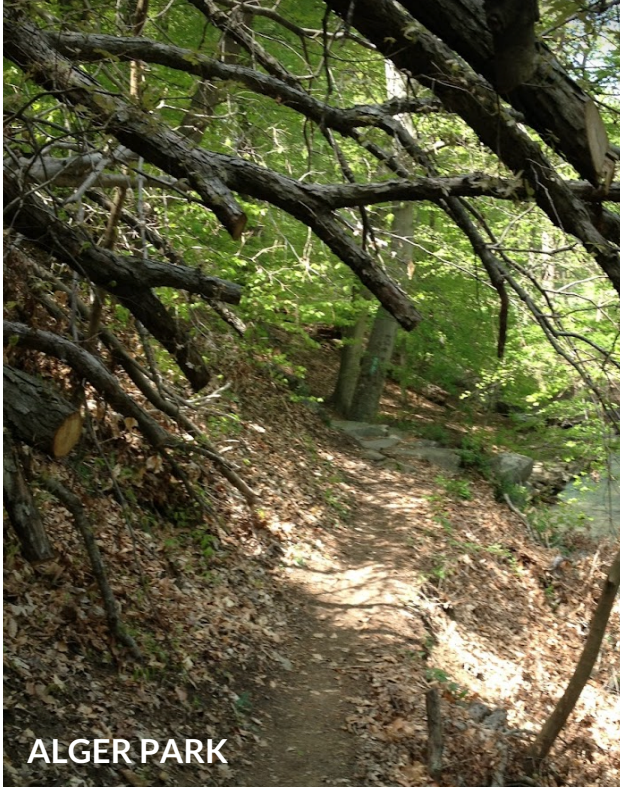
GEORGE WASHINGTON CIRCLE PARK

Additional Funding on the Way

For the first time in ten years, Congress increased the National Park Service's funding when President Biden signed the Consolidated Appropriations Act into law in December 2022. NPS was allocated an additional $210.3 million in discretionary funding, a 6.4% increase of their total budget. These resources are intended to fund staff raises, deferred maintenance, disaster recovery, improving climate resilience, advancing racial justice and preserving urban parks and rivers. In keeping with the Urban Agenda Initiative, these funds will also support twelve Underserved Community Outreach Coordinators who will work with urban national parks to build strategic community relationships, increase engagement with historically excluded communities and organizations, and build more inclusive park connections with urban communities. It is unclear if DC will be one of the twelve cities receiving a coordinator.

As with all NPS funding, DC-area superintendencies will have to compete with other NPS units across the U.S. for any funding not already allocated for specific purposes in the District, and the allocated funding for the National Capital Region does not include funds for deferred maintenance. It does include several new FTEs, including for creation of a regional Office of Native American Affairs and a Tribal Liaison, increasing operating hours for African American cultural and historical sites in NACE, and interpretation and permitting at the WWI Memorial in NAMA.


TIDAL BASIN


ALGER PARK

Vision & Coordination

The District's Park System Lacks Central Leadership and Vision

Despite owning most of the parkland in the District of Columbia, and exerting significant control over that parkland, NPS does not manage its DC parks in a centralized way. NPS does not have a comprehensive master plan for its District properties, and even when the National Capital Region prepares centralized plans such as the Small Parks Plan, the multiple superintendencies make coordinated implementation difficult. Furthermore, NPS's prioritization of national over local interests is reflected in its approach to DC's parks. NPS has never conducted an assessment of the recreational or greenspace needs of District residents to inform its parks planning and does not center local voices in its decision making. The result, advocates say, is that NPS operates as a federal agency that happens to own a few hundred parks in the District, rather than acting as the caretaker of the District's overall park system, leading to a vision and leadership vacuum.

DPR has stepped in to fill some of this role; for example, DPR has been tasked with identifying the recreational needs of residents, including amenities such as playgrounds, fields, and dog parks, and is in the process of issuing its 20-year Ready2Play Master Plan. While the District has significant financial resources to invest in parks and recreation, DPR's ability to create a unified park system is severely limited by the fact that it runs only 10% of the District's parkland, and does not have authority to use federal parkland to meet community needs. Furthermore, most interviewees concede that DPR is not currently prepared to take on the entire park system; the relative lack of parks in its portfolio have resulted in an agency more focused on recreation and programming than a comparative agency in a city that owns its own parks. As a result, the District of Columbia has no centralized leadership with both an actionable long-term vision for its park system and the capacity to execute that vision.

NPS operates as a federal agency that happens to own a few hundred parks in the District, rather than acting as the caretaker of the District's overall park system



Lack of Regular Coordination Between NPS & the District Impedes Progress

Despite the overlapping interests of NPS and the District, and the fact that they often share jurisdictional boundaries, NPS staff, District government staff, and outside groups do not regularly coordinate with each other about park land. This is particularly true on big-picture collaboration and long-term planning, but also on individual projects, where people remain siloed and interagency communication is spotty. This lack of coordination leads to missed opportunities for collaboration on improving the overall park system.

Regular coordination is hindered by the fact that neither NPS nor the District has designated personnel in place to manage the relationship. In theory, on the District side, this role falls to the Mayor's Office of Federal and Regional Affairs (OFRA), which interfaces with Congress, federal agencies, the White House and all levels of regional governments on behalf of the District of Columbia. However, OFRA has a small staff that does not include people with parks expertise, and NPS is just one of many agencies within the portfolio of a single staff person. As it currently stands, OFRA does not have sufficient bandwidth or particularized expertise to facilitate ongoing communication and collaboration on the hundreds of NPS properties across the District. On the NPS side, the multiple superintendencies mean that no single NPS staffer or office is empowered to make decisions on behalf of all NPS parkland in the District.

In the early 2000s, NPS attempted to meet regularly with District agencies to discuss areas of collaboration, but, according to NPS, these meetings have since fallen apart due to lack of interest. In our interviews, we heard from several District government employees that they would be eager to meet regularly with NPS, although they conceded that this might require additional staff resources, because the District does not currently have dedicated resources or FTEs at the relevant agencies for liaising with NPS. Similarly, the CapitalSpace planning effort brought together collaborators on a regular basis for two years, but these meetings ceased following publication of the report. Without regular meetings and interagency stewardship, the recommendations in the report have not been implemented.

This lack of coordination is particularly limiting given the current landscape, wherein NPS has most of the land but no funding, and the District has significant funding but limited land ownership. It is likely that the two entities are missing opportunities to collaborate, to transfer jurisdiction of land where appropriate, and for more cooperative management agreements like the one in place at Franklin Park. For example, in NPS's Small Parks Plan issued in 2017, NPS created an evaluation tool to classify their small parks by alignment with the NPS mission, to determine the most appropriate avenue for future management (for example, a CMA or a TOJ). This tool found that over 20% of the District's small parks have weak alignment with NPS's mission and would be appropriate for a TOJ. It is unclear from our conversations whether this tool was ever shared with anyone at the District government, and it does not appear that any official conversations have occurred regarding a comprehensive transfer, despite this being a major recommended action in the report.

The lack of coordination is also a problem for existing projects. NPS and the District do not share information with each other regularly about their plans or progress. In our interviews, we heard conflicting accounts of several different projects and initiatives, indicating that the right people are not connecting across jurisdictions. This siloed jurisdictional structure also means that park resources are rarely designed as part of a comprehensive park system. For example, one interviewee cited an instance where NPS and the District were working on park projects in close proximity, but did not realize it until late in the process. As a result, the projects included redundant infrastructure rather than complementary design.

Finally, the lack of coordination adversely affects day-to-day management of the parks. For example, for several NPS properties, DPR currently provides permitting services for sports leagues and other recreational activities. But permit users state that the two entities do not communicate regularly about these properties. As a result, it is not unusual for DPR to issue a permit for a site, only for NPS to shut down that site without notifying DPR or the permit holder.

Coordinating with NPS is Slow and Burdensome

A common refrain we heard in our conversations is that working with the National Park Service is slow and involves significant administrative oversight. Several interviewees said that if they can avoid working with NPS or on NPS land, they will do so, because the time and effort required is too burdensome. Projects on NPS land are subject to numerous regulations and requirements, and the planning process takes years. In addition, because NPS handles oversight and is itself short-staffed, the administrative oversight process requires significant time and resources. At times, it can take months just to get the required documentation signed. In addition to NPS oversight, projects often must go through multiple layers of review, notably through the Commission of Fine Arts and the National Capital Planning Commission. Some projects involve additional federal agencies; an effort to redo signs along the National Mall required the approval of 8 different agencies.

These long timelines even apply to work done by District agencies on NPS land, such as transportation-related infrastructure (like trails) by DDOT and stream restoration by DOEE. For these projects, the District supplies the funds and seeks a permit through NPS. Because projects are conducted individually, with different superintendencies, it is particularly time consuming to comply with federal regulations. The District must repeatedly go through the process of explaining the environmental impact of its proposed projects. Even when the District government supplies the funding, NPS must oversee its compliance with federal regulations, which introduces further delays given NPS's staff and resource constraints.

Long timelines introduce further hurdles, as priorities and personnel shift. Sometimes when a project is happening over many years, personnel changes may require the community to restart the whole process. Multiple interviewees shared experiences in which they had worked for years to obtain the required documentation and permits, only for a new superintendent or key staffer to take over and deprioritize, alter, or even quash a project.

Some collaborations between NPS and the District appear to be delayed by the lack of centralized leadership and resources. For example, transfers of jurisdiction typically take years to execute, for reasons unclear, other than it takes time for the necessary approvals to go through. These delays appear to be driven by lack of personnel and prioritization on both the federal and District side. The Office of Federal and Regional Affairs, which is in charge of TOJs, is not focused on parks. In addition, because the District does not have a designated point person or office for liaising with NPS, NPS receives requests from all over the District government, which can overwhelm the understaffed agency. At the same time, individual District employees feel that they do not have strong contacts at NPS, making coordination difficult.



POCKET PARK IN NOMA

Source: DCist

First Came Approvals: The Chicken & The Egg

In 2017, the NoMa BID began efforts to install an art installation on two small triangles of land owned by the National Park Service at the busy intersection of North Capitol Street, New York Avenue, and N Street NE. The installation, dubbed the Chicken and the Egg, would be fully paid for and managed by the BID and serve as a gateway into the NoMa neighborhood. At the time, the plots of land were unused by NPS and housed only some overgrown ground shrubs, dirt, and an electrical box. The BID engaged an expert design team for the project and began meetings with key local and federal partners in early 2017, obtaining input from DDOT, NPS, CFA, and NCPC, as well as the surrounding community. In 2018, the BID pursued federal approvals with NPS, which required a rigorous review process by the CFA, NCPC, and the State Historic Preservation Office. The project was limited by many NPS regulations that restricted design, including a limitation that any installations could not "penetrate the ground plane," thereby prohibiting a traditional foundation and requiring a modified lighting plan for the installation. In addition, NPS required the BID to prepare a landscaping and maintenance plan for the property, which until that point had been essentially abandoned by the federal government.

In February 2019, the BID received federal-level approvals and the installation was completed in July of that year. Even at that point, with both chicken and egg in place, the BID was still waiting for NPS to formally sign a partnership agreement to manage the site—a process that was further delayed when the BID's point of contact retired. All told, it took a highly qualified planning team and BID resources over two years to install an art installation in two neglected micro-sized plots of NPS land.

Filling In the Gaps: The Capital Trails Coalition

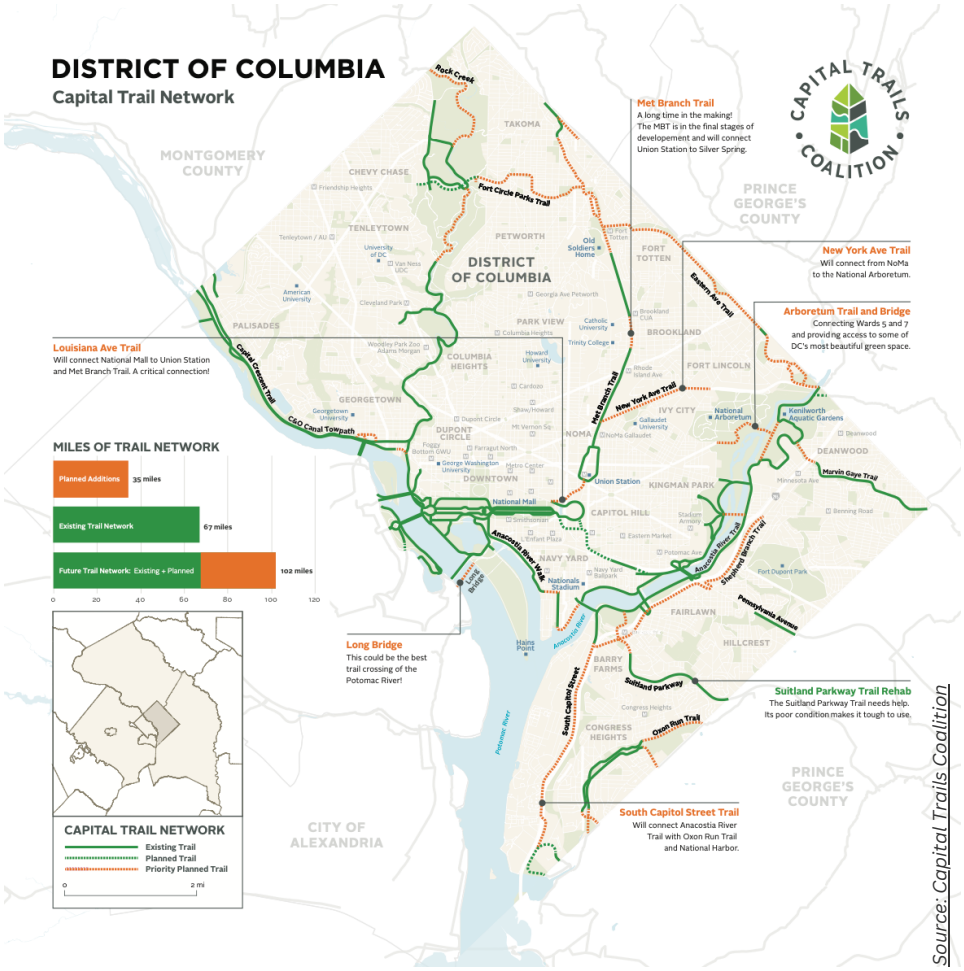
Formed in 2015, the Capital Trails Coalition (CTC) is a collaboration of public and private organizations, agencies, and citizen volunteers working to advance the completion of an equitable and interconnected network of multi-use trails for the DC metropolitan region. Because the trail system implicates so many jurisdictions, CTC acts a convener for many federal, local, and state entities to expedite the trail building process for the Capital Trails Network. Their priority projects include trails under the jurisdiction of the District and NPS as well as counties in Maryland and Virginia. Among the priorities of CTC are expanding sections of the South Capitol Street, Oxon Run, and Anacostia Riverwalk trails to better connect with surrounding trails and neighborhoods. As part of their work, CTC tracks projects happening across multiple jurisdictions and collaborates with these agencies to build trusting relationships, share best practices, and secure funding.

CTC recognizes that green infrastructure promotes public health in the District. An interconnected trail network will create safe and easy access to open space, provide ecosystem services (tree cover, cooling, water and air pollution filtration and flood mitigation, etc.), increase mobility for residents via active transportation, and strengthen the economy through upfront investment and connecting end-users to local businesses.

In the District, CTC projects that completion of the Capital Trails Network will avoid $100 million public health and $8.6 million environmental costs annually and add 1,050 jobs from annual trail spending. Crucially, the network will support equitable access to trails and parks: 466,030 residents will live within 2 miles of a trail and these trails will have 180,430+ regular users, including 13,500+ residents who will walk or bike to work.

> Completion of the Capital Trails Network will avoid $100 million public health and $8.6 million environmental costs annually and add 1,050 jobs from annual trail spending

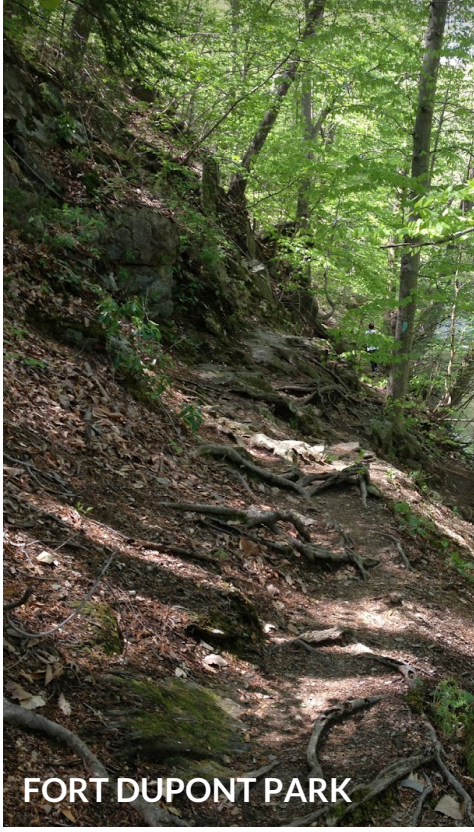
When working towards expanding this network and improving existing trails (*e.g.* adding correct wayfinding and jurisdictional signs) in the District, CTC faces similar barriers to organizations when trying to activate our park system. Each agency has its own role in land development and its own priorities for the land, which is made even more complicated by the jurisdictional overlap in many trails and parks. NPS has historically been hesitant to build or even support new trails. This is due to their mission of land preservation and lack of funding and capacity to manage trails and protect resources that would be disturbed by increased trail and park use. CTC has been effective in its mission because it tracks projects, addresses roadblocks, and brings key decisionmakers together—providing leadership and momentum that does not currently exist at the government level. CTC's progress in building key relationships and a trail network has demonstrated how a neutral convener can be effective in expanding access to parks and open spaces in the District, and can serve as a model for how to make similar progress across the entire park system.



Source: Capital Trails Coalition



GRANT CIRCLE PLAYGROUND



FORT DUPONT PARK

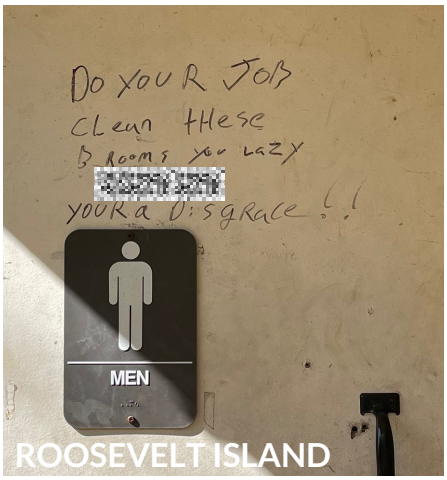
Communication & Accountability

DC Residents Lack Influence Over NPS Priorities

As noted above, NPS's priorities often do not reflect the needs and priorities of District residents. We heard throughout our research that NPS is not responsive to local voices, and that District residents do not feel like they are able to communicate with NPS about what they need and want from their neighborhood greenspaces. Many invested community members and organizations described a real problem with lack of responsiveness and meaningful feedback loops. Residents do not know how to reach NPS, and NPS does not currently engage with the community in any significant way, in part due to staffing constraints. NPS often states that they track communications sent to them via their superintendency main phone number, comment portals, or email addresses, but many residents say that they have sent "countless emails" about their neighborhood parks to NPS and have never received a response.

This is particularly problematic because NPS has indicated that its priorities are set in response to community pressure, yet community members do not know how to exert that pressure. At the same time, NPS has said explicitly that it does not give the needs of District residents special weight in the decisionmaking process. For example, when NPS does a public engagement for an Environmental Impact Statement related to a DC park, it opens its surveys to everyone in the country and weighs a comment made by someone who lives in Colorado the same as a DC resident who lives across the street from the park. Because of this disconnect and the communication issues described below, residents feel at the mercy of a bureaucracy that is not accountable to them, in an arrangement that often feels anti-democratic.

> Residents feel at the mercy of a bureaucracy that is not accountable to them, in an arrangement that often feels anti-democratic



ROOSEVELT ISLAND

Vandalism & Criticism

In addition to the glaring grammatical error, this graffiti is indicative of the typical disregard of the labor required to maintain public parks. On-the-ground parks staff face many occupational challenges, including harassment, injury, assault and other adverse health risks.

NPS Does Not Proactively Engage with the Community

In our interviews, many residents stated that they find it difficult to communicate with NPS because the agency does very little proactive engagement with the community. NPS confirmed its lack of engagement in its DC Urban Agenda report, which states that "NPS staff [in DC] believe they have very little capacity to effectively collaborate, communicate and facilitate new partnerships and community outreach."

> "NPS staff [in DC] believe they have very little capacity to effectively collaborate, communicate and facilitate new partner-ships and community outreach"

Some superintendents will attend Advisory Neighborhood Commission (ANC) meetings in affected neighborhoods to share information about projects. But other ANCs report that NPS does not engage with them or even acknowledge their existence. Some interviewees reported that NPS used to hold regular community meetings, but these are no longer in place and it is unclear whether they will be reinstated. In addition, Delegate Norton holds quarterly "town hall" meetings with NPS that are open to the public. However, in their current form, these town halls do not provide for meaningful dialogue between the agency and the community. Finally, NPS will sometimes hold community meetings on specific projects, but does not hold regular meetings that would foster ongoing collaboration.

NPS also does not provide readily accessible information about upcoming or ongoing projects. NPS maintains websites for some major projects, but these are not kept up to date and often do not reflect delays, nor provide specific details. For smaller projects, NPS generally provides no publicly accessible information or updates. In addition, NPS's map of DC-area parks does not provide information about park-specific projects.

This lack of community engagement sharply contrasts with DPR's engagement process. DPR's Ready2Play master planning process engaged thousands of residents through surveys, community events, and virtual and in-person meetings. The Ready2Play Plan also includes commitments to engage communities in the future to ensure that they have the opportunity to shape the offerings of their local parks and recreation centers, and conduct engagement with communities before making recommendations for future capital projects, to ensure that they appropriately respond to the needs and desires of the community.

NPS Has No Centralized, User-Friendly System to Connect with the Community

Many communication problems are driven by the fact that NPS does not have a straightforward, predictable method for bidirectional communication with residents. As previously noted, many residents are unaware that their local park falls under NPS's jurisdiction. But even after a resident has identified a property as NPS, most do not know how to reach the agency. This results in a haphazard system in which residents will reach out to BIDs, Friends groups, ANCs, DC Council offices, and Delegate Norton's office. Because they do not know how to reach the relevant NPS staff, they will call or email the superintendent. Even for residents who eventually reach their target, this is not an efficient system.

While established NPS partners, such as BIDs and Friends groups, often develop informal contacts at the agency, even they state that they sometimes find it difficult to identify the best contact on any given issue. As a result, residents and organizations who have attempted to work with NPS on a local park describe leaving the experience confused and frustrated. Driving this decentralized, opaque system of communication is the fact that NPS has no system in place for connecting with the community. Each superintendency's website includes a contact form and a phone number, but they do not have a standardized system for processing complaints and requests, and residents state that their efforts to reach NPS often go unanswered.

> NPS has no system in place for connecting with the community

By contrast, the District of Columbia operates a 311 system for residents to submit maintenance and other requests. When a 311 request is submitted, it is sent to the appropriate DC agency, which responds to the request within a time period set by a level of service agreement. The agency will either satisfy the request or close it out with an explanation. As most 311 users will readily admit, 311 requests do not always end with satisfactory results. But residents did express satisfaction with the fact that there is a navigable system that tracks requests and outcomes.

At a recent NPS Town Hall held by Delegate Norton, a resident asked that NPS establish a 311-type service request system for things like trash cleanup, dumping, fallen trees, overgrown vegetation, etc., so that residents do not get bounced from one official to another and so that there is adequate tracking and accountability.

The District's 311 System Does Not Include NPS

In addition to not having its own service request system, NPS is currently not integrated into the District's 311 system. When District agencies receive a request related to NPS land (which happens frequently given that District residents do not know who owns what), such as a maintenance request or illegal dumping, the agency will close the request as outside their jurisdiction. The Office of Unified Communications (OUC), which oversees 311, has no standardized process for requests related to federal lands. Nor do the individual agencies (DDOT, DGS, DPW) that receive them. As a result, these requests are not shared with NPS in a consistent manner. Even if they were shared with NPS, it is unclear whether NPS would be able to respond to requests in a timely fashion due to staffing and funding constraints. The lack of connectivity affects a range of services, from maintenance requests, tree planting requests, bike rack installations, traffic safety investigations, and reports of illegal dumping.

> OUC, which oversees 311, has no standardized process for requests related to federal lands. Nor do the individual agencies that receive them

DC Residents and Elected Officials Lack Oversight Over NPS

The unique jurisdictional structure in the District limits NPS's accountability to both local elected officials and local voters. District residents, lacking statehood or voting representatives in the House or Senate, have no elected representatives who oversee NPS. This can lead to absurd results; one park advocate told us that she encourages commuters from Maryland and Virginia to contact their Senators and Representatives about issues they see in DC parks, because they have representation that District residents lack.

Even if District residents did have Congressional representation, Congress lacks the bandwidth to meaningfully oversee the hundreds of pocket parks in the District. Delegate Norton holds quarterly town hall meetings with the public and NPS, but these are insufficient to cover the hundreds of issues that come up and there does not appear to be significant follow through. As a result, community members reported that they feel that NPS makes empty promises and that no one is tracking follow up, and that is difficult to obtain information from the agency. This is particularly problematic given the length of time it takes to complete even basic maintenance projects on NPS land. Community members feel that when they raise issues, NPS will acknowledge them but then do nothing to act on them—and they have no way to hold the agency to their word.

As a result of this disconnect, NPS is not held accountable to the public in the same way that park managers in other states or District agencies are, despite the fact that NPS is responsible for miles of public streets and acres of public lands in the District. One recent example of this lack of accountability is the April 24, 2021, incident in which two DC pedestrians were killed by a driver at Hains Point. The incident fell under the jurisdiction of the U.S. Park Police, which operates under NPS. In comparable situations on District land, the Metropolitan Police Department would share a police report with the name of the driver. In the Hains Point case, U.S. Park Police refused to share this information with the victims' families, which prevented them from proceeding on their life insurance claims. Over a year after the crash, it took intervention by Delegate Norton for the families to receive this information.

> As a result of this disconnect, NPS is not held accountable to the public in the same way that park managers in other states or District agencies are, despite the fact that NPS is responsible for miles of public streets and acres of public lands

While acknowledging that local government provides plenty of frustrations, many residents report that they feel District agencies are more responsive to local needs. District residents feel better represented by DPR leadership, because the agency is led by a director selected by a Mayor elected by local voters. In addition, DPR and other District agencies are subject to regular oversight by the DC Council and are often more responsive to hyperlocal Advisory Neighborhood Commissioners. District residents feel that they are lacking a comparable way to keep tabs on NPS's projects, promises, and activities because the agency is not beholden to any leadership elected by local voters.



BEACH DRIVE

Policies & Procedures

NPS Policies Severely Limit How the Community Can Use its Spaces

Parks in the District serve many functions. The National Mall and monuments in the downtown core greet millions of tourists every year, as well as host major First Amendment activities like protests and marches. Away from the Mall, neighborhood parks serve District residents the way that local parks would in any other city: play spaces for children and families, recreation areas for sports and physical activity, and gathering spaces for community events and festivals. Unlike in other cities that control their own parks, NPS's mission to preserve creates restrictions on how parks in the District can be used.

These restrictions severely handicap activation of the District's greenspace, because NPS controls the vast majority of this space, and in many parts of the District, NPS owns the *only* public space. For example, all public space in the Downtown, Georgetown, and Dupont BIDs belongs to NPS. This means that the District does not have the ability to use neighborhood greenspace the way that other comparable jurisdictions might. As noted in the CapitalSpace report, "desired modern urban uses of these spaces often conflict with the NPS's service-wide management and preservation methods for its traditional parks." In the Small Parks Plan, NPS acknowledged the conflict between NPS regulations and urban parks, recommending that NPS "investigate exceptions to governing regulations for small parks to increase flexibility for programming."

In our interviews, organizations cited numerous regulations that inhibited community use of NPS land. NPS places limiting rules on its properties that make it particularly difficult to use NPS parks for events and programming. For example, NPS regulations forbid concession sales, including food and drink, as well as maker products, such as crafts, by entities that have not received a concession license—an insurmountable barrier for many local businesses. NPS also prohibits advertising on its properties; community groups have even been told they are not allowed to hand out flyers about future community events. NPS also closes many of its parks at dusk, which inhibits use and safety. For example, in Georgetown, sections of the C&O Canal towpath are used by the public as sidewalks. NPS maintains that the park is closed at dark, even though they are aware that the space is widely used. For this reason, they refuse to provide (or allow installation of by external partners) enhanced lighting, in clear disregard of resident safety and wellbeing. Even for special events, NPS recently indicated that it will shut down events at 10 PM for noise, further limiting how spaces can be used. Although a foundational purpose of public parks is to provide a space for the public to gather, NPS's restrictions create a high barrier to community use of a park for this purpose.

Permitting Process is Lengthy and Arduous

Many park activities require permits and official approval from the government with authority over the park. Currently, this permitting process differs vastly depending on whether the permit is to use NPS or District land, and differs further between superintendencies due to policies on how space can be used and the overall permitting process.

Community organizations describe the NPS permitting process, which governs everything from major events to small community cleanups, as a "black box." Permit requirements vary depending on the superintendency and who happens to be overseeing a permit application, and high turnover within NPS exacerbates this inconsistency. In a recent example, NPS informed the Stonewall Bocce league they could no longer play on Logan Circle because the NPS permit they were originally issued eleven years ago was invalid. Reversing an earlier staffer's decision, the agency determined that Stonewall Bocce was an organized sports league, rendering them ineligible to reserve the area starting in 2023.

Because the permitting process can take months, organizations must plan ahead—sometimes up to a year in advance. The DC Office of Planning's Public Space Activation and Stewardship Guide states that NPS permitting duration ranges from 6-12 months, and that applications must be submitted 12 months before an event. For the majority of permits, NPS currently offers no online application, meaning that all permit applications must be mailed or delivered in person. There is no designated person at the superintendencies to handle permits, and many organizations say they find it difficult to identify the correct contacts at the agency.

> There is no designated person at the superintendencies to handle permits, & many organizations say they find it difficult to identify the correct contacts

Because there is no designated person to call when there is an issue with a facility, site, or permit, park users will try to flag down Park Rangers (only possible during working hours), or even Park Police. We heard from several community organizations that said it was so difficult to work with NPS that they had stopped pursuing programming on NPS land altogether. In practice, this means that the majority of the District's greenspace is unavailable for organizational programming. It also means that the permitting process impedes community efforts to contribute to basic maintenance and stewardship of their parks—contributions that NPS sorely needs given its own resource constraints.

Neighborhood groups concede that they can also experience snags with the DPR permitting process; however, they state that working through DPR is far less trying than navigating NPS processes. One user described DPR's permitting system as dated, but "from 2012, whereas NPS is turn of the millennium." DPR has an online permit application that takes ten minutes to fill out and applicants receive a response within 30 days. According to the Public Space Activation and Stewardship guide, applications are due 30 days prior to an event and are typically processed in 10 business days. Individual residents and community organizations alike also describe DPR as very responsive, and appreciate that there is a person you can call to inquire about the status of an application.

Partnership Agreements —Designed to Facilitate Collaboration—Are Overly Burdensome

Recognizing that the permitting process is difficult, NPS offers philanthropic partnership agreements to streamline permitting and processing for partners that work regularly with the agency, the idea being that one partnership agreement can replace multiple permit requests. For example, organizations that wish to conduct regular cleanups without repeatedly applying for a permit could instead execute such a partnership agreement with the agency. These partnership agreements have been successfully executed with Friends groups and some other community partners. For example, the Rock Creek Conservancy is a robust, well-resourced partnership organization that sponsors frequent cleanups in Rock Creek Park. While partnership agreements tend to work for larger, well-resourced organizations, most community groups are much smaller, and might only be able to organize one or two cleanups a year. For these groups, the perceived complexity of the partnership agreements deter potential collaborations. Such an agreement, which governs sustained contributions (financial or in-kind), is 20 pages long, not including appendices and up to 11 attachments, including a required annual work plan. This process is so onerous that even some BIDs have not entered into such agreements with the agency, let alone small community groups that have no resources or legal expertise. In addition, even organizations with partnership agreements report that they avoid working on NPS land when possible—further indicating that these burdens are preventing community use of NPS parklands. Finally, some NPS staff indicated that the agency lacks the capacity to take on additional partners, given the burden of executing and overseeing these agreements.



GEORGE WASHINGTON CIRCLE PARK

Solutions: Next Steps for Fully Activating DC's Park System

For the reasons described throughout this report, NPS's outsized control of DC's parklands has made it difficult to equitably maintain and improve DC's park system. In the following section, we provide policy recommendations for actions the District, NPS, and Congress can take to better leverage DC's park resources to achieve the shared goals of activation, equity, and health.

Policy Recommendations for the District of Columbia

To achieve a cohesive park system that serves the needs of local residents, nearly all interviewees agree that the District should take control of more neighborhood parks. While transfers would require action by NPS and/or Congress (discussed further below), there are several actions that the District can take independently to improve the park system—and to prepare for a future in which the District directly controls more of its greenspace.

1 Establish an Office of Parks within the DC Department of Parks and Recreation

The District should establish an **Office of Parks** within DPR tasked with two major responsibilities: (1) coordinating with NPS on parkland in the District and (2) managing and maintaining the District's parks (as distinct from its robust recreation) portfolio. This office would address the need for greater vision and coordination by increasing the District government's capacity to manage its relationship with NPS and, eventually, manage a larger parks portfolio.

Currently, there are no ongoing, consistent staff resources dedicated to the relationship between the District and NPS. Opportunities for collaboration are frequently missed and projects are dropped, sometimes after years of work, because no one is tasked with tracking and advancing them. While NPS does not have the funding to substantially increase its capacity to focus on these needs, an Office at DPR with resources and parks expertise would be able to focus on improved coordination between the District, NPS, and community organizations. Local projects are most successful when they have sustained resources and strong relationships between DC staff, NPS staff, and the community, and this Office would build these advantages into DPR's operating structure.

This Office would be responsible for implementing TOJs and CMAs for NPS parks, implementing a strategic action plan for NPS-owned parkland (as recommended on page 43), and identifying opportunities for collaboration and resource- and systems-sharing. By standardizing and streamlining the CMA and TOJ agreement language and process, and providing an engaged point person to oversee both, this Office will help ensure that CMAs and TOJs move forward without significant delays. This Office should also be empowered to play an oversight and convening role on behalf of the community, tracking the status of transfers, cooperative projects, and NPS projects. NPS has acknowledged that its outreach capacity is limited, which often leaves communities in the dark. By acting as a designated liaison, DPR can disseminate updates to the community using its (*cont.*)



ROCK CREEK HORSE ARENA

more robust outreach and communications capacity. In addition to coordination with NPS, this Office should manage and maintain DPR's portfolio of larger parklands. Many interviewees noted that DPR currently lacks parks management expertise due to its very limited parks portfolio, its focus on recreational facilities and programming, and the fact that District parks are maintained by DGS. One of the major concerns with expanding District jurisdiction over NPS park space is the attendant management and maintenance obligations this would create. If the District is to gain jurisdiction over more park space, as is recommended by Ready2Play and this report, DPR's capacity to manage and maintain parks must be expanded. A Parks Office would meet that need by expanding DPR's parks expertise, ability to focus on long-term parks planning, and maintenance capabilities. These recommendations are consistent with the CapitalSpace recommendation that the District identify one agency to manage parks agreements, and would address NPS's concern that they are overwhelmed with requests from across the District government. They are also consistent with Ready2Play, which includes acquiring more parkland through TOJs and CMAs with NPS (and even prioritizes specific NPS sites), and developing clear standards and protocols to guide the District's pursuit of additional TOJs or CMAs with NPS. This Office would take the lead on moving these collaborations forward and providing vision and leadership for the future of the overall park system.

2 Establish a Parks Advisory Board or District Parks Coalition

To support the new DPR Office of Parks, the District should establish a **Parks Advisory Board** to serve as a coordinating body for relevant agencies and organizations and advise on the long-term direction of the District's park system. This Board should comprise representatives from relevant District agencies (DPR, OP, DDOT, and DOEE), all of the major NPS superintendencies (NAMA, NACE, Rock Creek), BIDs, community groups, CFA, and NCPC. The Board should meet regularly to share information about ongoing projects and identify opportunities for collaboration. The Parks Advisory Board should advise the Office of Parks and be tasked with preparing a joint action plan (see page 43) focused on the future management of NPS land. To ensure that the Board remains effective and focused, it should be given staff support from the Office of Parks.

The Parks Advisory Board would provide much-needed ongoing coordination across NPS superintendencies and District agencies. Past efforts at joint collaboration, such as the CapitalSpace Initiative, have languished because they did not provide for ongoing coordination or regular meetings (after publication of the report) and lacked designated staff resources for implementation. By contrast, efforts like the Capital Trails Coalition (see page 34) have succeeded by bringing together key decisionmakers on an ongoing basis, tracking projects and roadblocks, and providing designated resources for a staff coordinator position. As an alternative, major parks collaborators and/or funders could establish an independent District Parks Coalition modeled on the Capital Trails Coalition. This coalition would similarly bring together all major parks-related entities, develop a joint action plan, and ensure designated resources for a staff coordinator position.



ANACOSTIA PARK

3 Establish a Parks Equity Conservancy to Equitably Support Park Maintenance Across the District

A problem underlying many of the challenges identified in this report is NPS's lack of sufficient funding to maintain or activate its parks, which falls hardest on communities with lower income levels. The District can take independent steps to address some of these funding gaps by establishing a District-wide **Parks Equity Conservancy** to support stewardship and improvements across the entire park system. A District-wide conservancy would leverage District funding and philanthropic contributions to support park space across the District, particularly in historically neglected neighborhoods. It could also be used to collect funds from private developers negotiated through the development review process. Conservancy funding could be disbursed to community groups using a low-barrier, noncompetitive grant program to fund park improvements and maintenance.

Currently, NPS relies heavily on philanthropic partnerships with 501(c)(3) organizations such as Friends groups to support park maintenance and operations. This arrangement contributes to significant inequities in park investments across the District, because communities with higher income are better positioned to establish, fund, and maintain a charitable organization. As a result, parks in neighborhoods with higher income are often better maintained, have less trash overflow, and contain more infrastructure and amenities. As recognized in the Ready2Play Plan, "while DC has several Friends groups that support DC's parks in diverse ways, there is no conservancy with a broad focus encompassing all of DC's parks that could leverage philanthropic funding interest through an equitable lens." DOEE runs a small competitive grant program focused on restoring natural areas, but it is entirely District-funded and limited in scope. A District-wide conservancy would more comprehensively these inequities and allow all neighborhoods to access the health benefits of urban greenspace. In addition to the Conservancy, the District should provide technical assistance for how communities can create a Friends group, as well as a community toolkit for how to activate local greenspace.

These recommendations are all consistent with DPR's Ready2Play Plan, which supports the establishment of a Park Trust or Conservancy Fund and the provision of resources and technical assistance to underserved groups and areas of the city, to help establish Friends groups for local parks and apply for grant opportunities.



GEORGETOWN WATERFRONT PARK







Policy Recommendations for the District & NPS

Even if the District were to take more control of its greenspace, the national interest in some sites, such as the National Mall and monuments, means that the overall park system will always implicate multiple jurisdictions. We identified several ways the District and NPS can work together to transfer jurisdiction where appropriate and improve joint management of the DC park system over the long term. While these recommendations will require NPS resources at the outset, they will ultimately reduce NPS's burden in managing parkland by leveraging District resources and streamlining operations.

1 Prepare a Joint Action Plan Specifically Focused on the Future Management of NPS Land

A major barrier to creating a cohesive park system in the District is the lack of centralized planning across jurisdictions. CapitalSpace was an important and ambitious exercise, but its large scope made implementation impracticable. The District and NPS should work together on creating a **joint action plan** focused on how the District's overall park system should be managed to maximize its potential. This plan should consider NPS's funding constraints and the District's relative financial strength, as well as a balanced consideration of the needs of District residents and NPS's priorities. It should also account for estimated annual operating and maintenance costs and funding strategies, including partnering with BIDs, Main Streets, and community groups. This action plan could be a deliverable of the Parks Advisory Board or District Parks Coalition recommended above.

In particular, this plan should take a hard look at transferring jurisdiction of a significant portion of NPS's portfolio to the District with a requirement that trans-ferred land be preserved for recreational use. Currently, the District and NPS pursue TOJs on a piecemeal basis, with the District regularly receiving requests from residents and community organizations about NPS parks that they want to see transferred or cooperatively managed. This approach benefits more highly-resourced communities, which face fewer barriers to advocating for their neighborhood parks. A comprehensive TOJ package would be more equitable, and would benefit both the District, by giving it more parkland to meet the needs of local residents, and NPS, by enabling the agency to focus its resources on sites central to its mission. NPS prefers not to build or manage nature trails, community gardens, playgrounds, bathrooms, and other amenities that District residents identify as top priorities. Transferring parks would enable the District to activate parks in ways that remain difficult when NPS retains involvement, and expand park spaces available to community partners that have historically found collaborating with NPS too burdensome. A TOJ also makes it easier for the District to invest local dollars into a park, and would likely (*cont.*)


KLINGLE VALLEY

increase the District's ability to access federal dollars under LWCF and ORLP. While attitudes about such an approach vary across the agency, NPS staff agree that the agency cannot meet the deferred maintenance costs of its portfolio, and some even readily state that NPS should transfer all spaces without national or historical significance. A comprehensive TOJ package would allow NPS to focus on mission-aligned assets and relieve staff of managing partnerships and oversight of parcels that are low priority to the agency.

In addition to outright TOJs, the plan should identify priority areas for future CMAs. CMAs may be particularly appropriate for parks that NPS views as central to its mission (and thus unlikely to support transfer), and that are also important to BIDs, such as parks in the downtown core. In planning for CMAs, collaborators should assess the Franklin Park model and revise future agreements to reflect lessons learned. The plan should also consider whether and where transfers of ownership might be appropriate (keeping in mind that because these require congressional action, they are more difficult to execute). Finally, the plan should identify areas where the jurisdictions can coordinate on maintenance contracts. For example, there are currently separate mowing contracts in place for DGS, DDOT, and NPS land; these contracts could be consolidated by geography or other bases to maximize efficiencies and likely save both jurisdictions money.

This plan would build on and consolidate work that is already being considered in silos. In the 2017 Small Parks Management Plan, NPS indicated an intention to explore transfer of jurisdiction for small parks. It also recommended an "umbrella" cooperative agreement with the District to cover all small parks that are partly managed or operated by the District. At the same time, Ready2Play includes acquisition of parkland through TOJs and CMAs with NPS. NPS and DPR should prepare and execute a plan that combines these priorities.

2 Establish a Shared Database to Consolidate Information on Federal and Local Park Resources

In addition to the need for increased collaboration, a common refrain among interviewees was the need for more information sharing. Central to the jurisdictional confusion is the fact that there is no shared understanding of who owns what. As NPS notes in the Small Parks Plan, "even agencies are sometimes uncertain who has jurisdiction over some spaces." To address this need, the District and NPS should **develop an intergovernmental database** of parks and open spaces to inform coordination between agencies and jurisdictions. This recommendation is consistent with both the CapitalSpace Initiative, which supports the creation and maintenance of "an online system for information on federal and local government park resources," and NPS's Small Parks Plan, which includes clarifying property data and resolving conflicting small park parcel boundaries as an action item. This database should include descriptive information on parks, such as ownership, size, location, function, level of use, historic or cultural value, commemorative elements, programs, and conditions. It should also be constantly updated to include current projects and projects under development, so that agencies, DC Council members and staff, ANC representatives, and others can check on project status. Finally, it should include contact information for the person or office to reach with questions, maintenance requests, or other needs. In addition to providing a shared foundation for collaboration, this database would help inform future planning and budgetary decisions.

3 Develop a Coordinated Approach to Service Requests

As noted above, there is currently no cross-jurisdictional coordination on service requests. The District operates a 311 system where residents can make requests for maintenance and other services, but this system is not linked to NPS properties, and NPS has no system in place for requests or complaints. To address this deficiency, we recommend that the District and NPS develop a **coordinated approach for handling service requests** and inquiries that bridges the two jurisdictions. Ideally, this approach should provide one centralized and easy-to-use method for residents to make requests that are then referred to the agency that can best address their concern.

More specifically, we recommend that the District develop a partnership with NPS that includes them as a responding agency within the existing 311 system. Under the current system, when a resident makes a 311 request on an NPS tract, the system will close out the request as outside the District's jurisdiction. Meanwhile, because NPS has no centralized system for requests or complaints, residents find it difficult to identify the appropriate NPS contact (that's if they know to contact NPS in the first place) and they often come through intermediaries like BIDs, ANC commissioners, or even Delegate Norton's office. Once they reach NPS, there is no system for tracking a request. This system fails residents and results in inequities given that it favors people with connections to NPS and neighborhoods with a Friends group or BID. A coordinated system will ensure that requests and complaints are routed to NPS when appropriate, and will provide an existing system structure for NPS to communicate responses to requestors. This will increase transparency between NPS and the community without requiring NPS to develop its own system. It will also help the District address the significant volume of requests it receives regarding NPS land, which has been flagged as an issue by multiple District agencies.

4 Establish One Permitting System for All Parks

Parks in the District are frequently used for permitted activities such as sports leagues, protests, and festivals. The process and designated system for getting a permit for these activities differs vastly depending on whether you need an NPS permit or a District permit. To streamline this process and make it more equitable, we recommend that NPS work with the District to establish **one permitting system** for all parks.

This would build on the recommendation in CapitalSpace to "simplify the permitting process between NPS, DPR, and DCPS and coordinate fees, signage, and enforcement." DCPS and DPR have already begun the process of coordinating their permitting systems. The District should work with NPS to develop a joint system that can be used for NPS permits as well as District permits, rather than having two parallel systems. One centralized system would allow organized sports leagues, community groups, and residents to locate, reserve, and permit any park or facility regardless of which agency has management jurisdiction. NPS has indicated an interest in developing an online permitting system, but this is unlikely to occur without a significant increase in staffing capacity and funding. By working with the District to develop a single permitting system, NPS could leverage existing local resources.

We should note that NPS receives thousands of First Amendment permit requests for the National Mall and other national-facing spaces in its vicinity. These requests are distinct from the needs of District residents and it may be appropriate to route them through a separate process.



ROCK CREEK HORSE ARENA





MERIDIAN HILL/MALCOLM X PARK

Policy Recommendations for the National Park Service

The above recommendations are intended to provide solutions within the funding constraints of NPS and ways for DC and NPS to coordinate. We offer the following additional actions for NPS to pursue independently, with the recognition that these might be difficult to implement absent increased federal funding.

1 Simplify Permitting and Partnership Processes

We recommended above that NPS and the District work together to establish one permitting system for all public lands in the District. As an alternative, NPS should **simplify its own permitting process** by establishing an online permitting system, streamlining applications, and providing more consistency across operational units in the National Capital Region. NPS should also **simplify the partnership process**. Currently, philanthropic partnership agreements are so lengthy and technical that many groups do not pursue them. At the same time, NPS lacks the staff resources to manage these partnerships. NPS should simplify the partnerships to make them more accessible to community groups and to decrease the burden on NPS in overseeing them.

2 Update the Administrative Units in the National Capital Region

DC parks in the National Capital Region currently fall into six different operational units, all with different operating procedures and policies. This is confusing to residents and District agencies and leads to inconsistencies between units on permitting and other decisions. Currently the three major units—NAMA, Rock Creek, and NACE—are drawn roughly geographically, rather than based on the types of resources they contain. One suggestion we heard frequently is that these three operational **units should be redrawn** so that the National Mall and Monuments are in one unit, reflecting a different type of land use and priority, and the rest of the parks be put in a second unit for neighborhood parks primarily serving local residents.

3 Increase Community Engagement

Many park advocates, businesses, and nonprofit organizations report that there is little to no engagement between NPS and the community. To address this deficiency, all of the NPS superintendencies should increase opportunities for DC residents to **engage directly** with NPS by holding regular community meetings. NPS should publicize these meetings in a way that helps the public understand how NPS decision making affects them (recognizing that many DC residents are unaware of NPS's significant role in the region). This community engagement should allow for meaningful, bidirectional communication between residents and the agency. NPS should seek community feedback on proposals and respond to questions and requests. These meetings should be held monthly to facilitate follow-up on outstanding requests and questions, and to provide regular updates on pending projects. NPS should take advantage of the ease of virtual meetings that has come out of the pandemic.



4 Amend Management Plans to Prioritize Local Uses

As discussed above, NPS often prioritizes preservation over current use by residents. That said, NPS facilitates active use of many of its park spaces in DC, most notably the National Mall. Its management plans for these spaces acknowledge both the importance of use and of good stewardship so that such spaces can be used by future generations. NPS should **update the purpose and management practices** for its DC parks to similarly maintain a balance between enjoyment by current generation and preservation for future generations which does not entirely lean toward the latter but values both.

Further, NPS should release itself from its historical landscape plans and embrace the notion that the needs for small parks have changed, and therefore so too can the design of such parks. It should update its regulations to the extent allowed by existing authority to make this more feasible when the landscape plan is not of exceptional historical significance.



ROCK CREEK PARK



WOODLAND-NORMANSTONE TERRACE PARK

Policy Recommendations for Congress

As described above, there are many actions that NPS and the District can take using existing authorities. In addition, Congress can address some of the issues identified in this report by transferring title of land to the District, increasing federal funding for NPS's urban parks, and statutorily recognizing the unique needs of urban parks.

1 Transfer Title of Local-Facing Parks to the District

As we have recommended in several places above, the local government should take more control over parks in the District of Columbia to better realize the full potential of the park system for activation, equity, and health. This can be done absent Congressional action through transfers of jurisdiction and cooperative management agreements, among other arrangements. However, if NPS will not act alone, Congress should consider **transferring title of those NPS parks without national significance** to the District of Columbia to give the District full control over these spaces.

Transfer of title would allow these parks to be operated as neighborhood parks, and be fully incorporated into the District's vision for its neighborhood park system. Not only would District control relieve the federal government of the costs of managing and maintaining DC's neighborhood parks and allow NPS to focus on its assets most central to its mission, it would give District residents the autonomy and control over their park system afforded to all other cities in the United States.

2 Establish an Urban Parks Division within NPS

Problems in the District are frequently driven by the conflict between NPS's conservation-based mission and the needs and pressures of an urban environment, an issue that also arises in other metropolitan NPS parks. NPS recognized this disconnect in establishing the Urban Agenda Initiative, which sought to address challenges presented by urban parks that are distinct from the traditional management experiences of NPS's large western landscapes. While there were some promising steps at its launch, the Urban Agenda Initiative has been dormant since the Trump Administration. Furthermore, NPS is limited by statutory mandates that cannot be addressed by the agency alone. To address the unique needs of NPS's urban parks permanently and comprehen-

-sively, Congress should establish an **Urban Parks Division** within NPS that has a different mission and set of rules, comprising parks in DC as well as urban parks across the country. This distinct mission would support a separate set of founding rules and regulations more responsive to the realities and needs of urban parks. There is precedent for such a division; NPS parks in Alaska fall under a separate regulatory system, based on the recognition that these lands were used differently upon their entry into the Park Service's jurisdiction. A separate mission, with regulations tied to the urban context, would be consistent with the recommendations in CapitalSpace to "explore District-specific or other legislative changes that could provide increased (*cont.*)

partnering flexibility to NPS and DPR, recognizing the unique character of the District's parks and urban setting as the nation's capital" and to "pursue changes to laws, regulations, and policies for both District and NPS parks within the Center City to allow greater flexibility in programming and appropriate concessions that would encourage additional public use within the parks." Alternatively, Congress could place the Urban Parks Division in a more urban-focused agency such as Housing and Urban Development.

3 Increase Funding for Urban NPS Parks, Particularly in the National Capital Region

It is universally acknowledged that NPS is not adequately funded to manage and maintain all of its urban parks in the District of Columbia. The Biden Administration recently addressed the need for additional urban parks funding by designating $150 million toward the ORLP program. At the announcement, Interior Secretary Haaland noted that the ORLP is a "crucial tool to advancing environmental justice and ensuring equitable access to nature and its benefits [and] promote the health and welfare of urban communities." Because this funding is reserved for state and local parks, it does not benefit any urban parks within NPS itself, an omission that falls hardest on the District of Columbia. Recognizing the benefits of urban parks for climate, health, and equity, Congress should **invest directly in urban parks within NPS's portfolio**, and in particular address the funding needs of DC's park system.


LAFAYETTE SQUARE PARK

+ Ensure Appointees to CFA and NCPC have demonstrated experience and commitment to active urban public spaces & to the District of Columbia

In addition to the challenges of working with NPS, the requirements of CFA and NCPC further complicate the District's efforts to improve and maintain its greenspace. Despite their significant influence over the District's public spaces, the CFA and NCPC have surprisingly limited connections to the District of Columbia, and members are not required to have expertise or interest in urban parks or spaces. The President of the United States makes three appointments to NCPC, including one from Maryland and one from Virginia, and appoints all of the members of the CFA. Some appointees have had strong backgrounds in urban parks and a commitment to activating spaces, and some have had a great deal of awareness about or connection to DC. But these are not requirements of the roles, and so a majority of NCPC and CFA appointees have not had this background, and had little familiarity with the District beyond flying in monthly for a meeting, seeing the District by air, some of the District by car, and perhaps a small part of the National Mall on foot. Members without expertise in urban public spaces or awareness of the District from the local perspective can superficially push for bland, vacant, and ineffective park spaces by watering down proposals to their lowest common denominator. Congress and the President can improve this situation by ensuring that appointees have a demonstrated commitment to lively, active, and sustainable parks, as well as ties to the District of Columbia.



ROCK CREEK PARK



Conclusion

In many ways, the development and subsequent dysfunction of the city's urban park system parallels the prolonged disenfranchisement of the District of Columbia. Just as it would have been impossible for the founders to envision the growth, success, and diversity of the nation's capital, so too would it have been impossible for the city's planners to foresee the growing need and changing pressures for the city's greenspace. From the highest mountain peaks of the Alaskan wilderness to the smallest triangle park tucked within a residential neighborhood of DC, parks play a vital role in the promotion of community health and the protection of our environment. The National Park Service and its dedicated service members execute an essential mission, often in the absence of adequate federal funding and support, while protecting our country's most vulnerable and significant natural resources. However, this model has failed when applied in the District's urban environment.

This report outlines multiple strategies to improve the District's park system. Encouragingly, although these problems are foundational and complex, there is no shortage of community enthusiasm for our parks. Among the dozens of local organizations and park advocates interviewed for this report, not a single person was unwilling to be part of the solution. Realizing a world-class urban park system befitting the nation's capital will require no small amount of coordination, effort, and investment, but it will be worth it—for this and future generations.

Realizing a world-class urban park system befitting the nation's capital will require no small amount of coordination, effort, and investment, but it will be worth it

—for this and future generations.

Appendix A.

Glossary

Activation: using parks and open spaces for people, in ways that improve quality of life and community through dynamic engagement.

Climate Resilience: the ability to anticipate, prepare for, and respond to hazardous events, trends, or disturbances related to climate change.

Environmental Stewardship: the responsible use and protection of the natural environment through conservation and sustainable practices to enhance ecosystem resilience and human well-being.

Environmental Justice: fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

Health: the dynamic balance of physical, mental, social and existential well-being in adapting to conditions of life and the environment.

Health Disparities: preventable differences in the burden of disease, injury, violence or opportunities to achieve optimal health that are experienced by populations that have been disadvantaged by their social or economic status, geographic location and environment.

Health Equity: the state in which everyone has a fair and just opportunity to attain their highest level of health. Achieving health equity requires societal efforts to address historical and contemporary injustices; overcome economic, social and other obstacles to health and health care; and eliminate preventable health disparities.

L'Enfant Plan: the historic plan of Washington, DC designed by Charles Pierre L'Enfant in 1791 and revised and completed by Andrew Ellicott, which established the foundation of Washington's system of parks and open space.

Superintendencies: geographically divided National Park Service administrative units in a defined region. Superintendencies are managed by a superintendent.

Transfer of Title: transfer of property right that allows the owner to possess, control, and assert all rights over that property. Transfer of title from NPS to the District requires federal legislation.

Urban Greenspace: any partially or completely vegetated land or water within an urban area; often used for health, play and community. Urban greenspaces can serve as a health-promoting setting for all members of the community; it is therefore necessary to ensure that they are distributed equitably and are easily accessible for all.

Urban Heat Island: urbanized areas that experience higher temperatures than outlying areas.

Abbreviations & Acronyms

ANC - Advisory Neighborhood Commission
A non-partisan, neighborhood body made up of locally elected representatives called Advisory Neighborhood Commissioners. The ANCs' main job is to be their neighborhood's official voice in advising the District government (and Federal agencies) on matters that affect their neighborhoods, including zoning, streets, recreation, education, social services, sanitation, planning, safety, budget, and health services. Although they are not required to follow the ANCs' advice, many District agencies are required to give the ANCs notice of significant actions and afford their recommendations "great weight."

BID - Business Improvement District
A self-taxing district established by property owners to enhance the economic vitality of a specific commercial area. Business and property owners control the BID and how funds are spent. There are currently 11 BIDs in the District. BID expenditures are primarily used to supplement city services, including making capital improvements (e.g., street furniture, decorative lighting). BIDs clean and maintain a variety of District and National Park Service parks and public spaces. They also play a critical role in bringing stakeholders together to design, finance and build "dynamic and exciting" urban parks.

CFA - U.S. Commission on Fine Arts
Congress established the U.S. Commission on Fine Arts in 1910 as a permanent body to advise the federal government on matters pertaining to the arts and national symbols, and to guide the architectural development of Washington.

CMA - Cooperative Management Agreement
An agreement between the National Park Service and a state or local government agency to provide for the cooperative management of federal and state or local park areas where a unit of the national park system is located near a state or local park area. A cooperative management agreement between the NPS and a state/local agency will allow for more effective and efficient management of the parks.

CTC - Capital Trails Coalition
Formed in 2015, the Capital Trails Coalition is a collaboration of public and private agencies, organizations, and citizen volunteers working to advance the completion of an equitable and interconnected network of multi-use trails for the Washington, DC, metropolitan region.

C&O Canal - Chesapeake & Ohio Canal
A national park in the National Capital Region, the C&O Canal of the Potomac River begins in the Georgetown neighborhood of Washington, DC, and runs 184.5 miles into Maryland.

DCPS - DC Public Schools
The public school system for the District of Columbia. DCPS is an essential provider of outdoor recreational space with playgrounds, fields, and tennis and basketball courts. DCPS co-operates over a dozen co-located sites with DPR that involve shared outdoor and indoor facility use and management.

DDOT - District Department of Transportation
The District Department of Transportation is a DC government agency responsible for the management of transportation infrastructure and operations. DDOT maintains the perimeter of some DCPS schoolyards in addition to the local trails network, as well as owning and managing approximately 250 small parks such as triangles and plazas within the city Right of Way.

DGS - Department of General Services
The Department of General Services is a DC government agency of more than 700 employees with expertise in the areas of construction, building management and maintenance, portfolio management, sustainability and security at District-owned properties. DGS provides environmental management services for DPR parks, along with DDOT and DOEE. DGS is responsible for managing construction of all DPR capital projects and for regular maintenance and upkeep of the parks and recreational facilities in DPR's portfolio.

DOEE - Department of Energy & Environment
The Department of Energy & Environment is a DC government agency responsible for issuing permits, monitoring environmental conditions, enforcing environmental regulations, and informing and educating the public on local environmental trends and their benefits. In addition to undertaking environmental projects for DC parks, DOEE manages Kingman and Heritage Islands, the Aquatic Resources Education Center in Anacostia Park, and the former Washington Gas site near Boathouse Row.

DOI - U.S. Department of the Interior
The Department of the Interior is a cabinet-level agency within the executive branch of the federal government. DOI protects and manages the Nation's natural resources and cultural heritage; provides scientific and other information about those resources; and honors its trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated Island Communities. The National Park Service (NPS) was established as a bureau under the DOI in 1916.

DPR - Department of Parks and Recreation
The Department of Parks and Recreation is a DC government agency that manages green space, operates recreational facilities, administers recreational programming, and promotes citywide health and wellness initiatives. DPR owns 10% of the District's parkland, and their portfolio encompasses 243 park sites totaling 851 acres of green space, from small triangle parks to regional destinations. DPR's mission is to provide equitable access to Gold Standard recreational programs, services, and facilities-across all 8 Wards.

DPW - Department of Public Works
The District of Columbia Department of Public Works is a DC government agency that provides municipal services in two distinct program areas: environmental services/solid waste management and parking enforcement. In 1989, the Division of Park Services Act transferred control of parcels and monuments from DPW to DPR.

EPA - U.S Environmental Protection Agency
The U.S. Environmental Protection Agency is an independent agency of the federal government. The EPA protects people and the environment from significant health risks, sponsors and conducts research, and develops and enforces environmental regulations.

GAO - U.S. Government Accountability Office
The U.S. Government Accountability Office is an independent, non-partisan agency that provides Congress, the heads of executive agencies, and the public with timely and fact-based information to help the government save money and work more efficiently. In 2005, the GAO released a report on the National Park Service's managed properties in the District.

Health Equity: the state in which everyone has a fair and just opportunity to attain their highest level of health. Achieving health equity requires societal efforts to address historical and contemporary injustices; overcome economic, social and other obstacles to health and health care; and eliminate preventable health disparities.

HPHP - Healthy Parks Health People
Healthy Parks Healthy People (HPHP) is a global movement adopted and integrated by the National Park Service (NPS) in 2011 through their Office of Public Health. NPS's five-year HPHP strategic plan recognizes parks as vital health resources that have the power to bring lasting change for the American public.

LWCF - Land and Water Conservation Fund
The Land and Water Conservation Fund for state and local parkland was established by Congress in 1964 to fulfill a bipartisan commitment to safeguard our natural areas, water resources and cultural heritage, and to provide recreation opportunities to all Americans. The District cannot spend LWCF on property managed by NPS, so federal parkland in dire need of improvements misses out on this funding.

NACE - National Capital Parks - East
National Capital Parks - East is one of the National Park Service's six superintendencies in the National Capital Region. NACE covers a diverse set of parks across the eastern half of Washington, DC, and the Maryland suburbs. In DC, NACE covers most of the parklands south of Rhode Island Avenue and east of 2nd Street NE.

NAMA - National Mall and Memorial Parks
National Mall and Memorial Parks is one of the National Park Service's six superintendencies in the National Capital Region. NAMA's main property is the National Mall and national monuments, and it is largely oriented toward visitors to the District rather than local residents.

NCPC - National Capital Planning Commission
The National Capital Planning Commission is an independent executive agency charged with oversight and development of federal property within the National Capital Region. The NCPC served as the de facto planning organization for the District before the Home Rule Act of 1973, overseeing such projects as acquiring land to fulfill the L'Enfant and McMillan Plans in the Monumental Core. Today, NCPC is responsible for the Federal Elements of the Comprehensive Plan for the National Capital, and has final approval power over the District Elements (and therefore the entire Comprehensive Plan).

NoMA - North of Massachusetts Avenue
NoMA is a neighborhood in DC stretching from Union Station to the south and Q and R streets NE to the north. It is best known as a transportation hub and the home of Union Market.

NPS - U.S. National Parks Service
The National Park Service (NPS) was established as a bureau under the DOI in 1916. The National Capital Region of the National Park Service manages 90% of DC's parkland, divided into six administrative units called superintendencies, each run by a different superintendent.

OFRA - Office of Federal and Regional Affairs
The Office of Federal and Regional Affairs is a DC government agency that interfaces with Congress, federal agencies, the White House and all levels of regional governments on behalf of the District of Columbia.

OP - Office of Planning
The Office of Planning is a DC government agency that performs planning for neighborhoods, corridors, districts, historic preservation, public facilities, parks and open spaces, and individual sites.

ORLP - Outdoor Recreation Legacy Partnership
Established in 2014, the Outdoor Recreation Legacy Partnership program is a nationally competitive program that uses Land and Water Conservation Funds (LWCF) to provide grant funding to urban parks, prioritizing projects in economically disadvantaged areas.

OUC - Office of Unified Communications
The Office of Unified Communications is a DC government agency that provides centralized, District-wide coordination and management of public safety voice radio technology and other public safety wireless communication systems and resources – including 911 and 311

ROW - Right of Way
The right of way (ROW) consists of the travel lanes, on-street parking, sidewalk area, and other public space situated between the property lines on either side of a street.

RTCA - Rivers, Trails, and Conservation Assistance
Rivers, Trails and Conservation Assistance is a National Park Service (NPS) program that provides technical assistance to communities and public land managers in developing or restoring parks and creating outdoor recreation opportunities. Like the Outdoor Recreation Legacy Partnership, this program targets state and local parks, not federal land (as in NPS land).

TOJ - Transfer of Jurisdiction
The transferor (NPS) retains ownership of the property while the transferee (DPR) may be given authority to administer and maintain (manage) the property. The federal government has general statutory authority to transfer jurisdiction over park properties that it owns in the District to the District government, while a transfer of ownership would require new legislation.

Appendix B

Park Acreage As Reported By Different Sources

Due to the multiple jurisdictions, disparate recordkeeping systems, and inconsistent definitions of what constitutes "parkland," it is difficult to ascertain exactly how many acres of parkland are located in the District of Columbia. The chart below provides various estimates of total acres and acreage by jurisdiction/ownership provided by the sources we used for this report.

	U.S. Government Accountability Office (2005)	Capital Space (2010)	DPR Master Plan (2015)	DPR Ready2Play Master Plan (2022)	Trust for Public Land ParkScore (2022)
Total acres of parkland in DC	-	7,617 acres "of parks"	7,821 acres "of parks and open space"	8,631 acres (includes inventory of NPS, DPR, 3rd party parkland and recreational amenities)	9,924 acres "dedicated to parks"
NPS acres	**NPS manages** 356 federal properties covering about 6,735 acres	**NPS has jurisdiction** over almost 90% of parkland, over 6,7000 acres	**NPS owns** 74% of park acreage	**NPS operates** nearly 90% of park system (over 6,500 acres)	-
DPR acres	-	DPR owns 10% of park acreage	DPR owns 10% of park acreage	DPR portfolio includes 851 acres	-
Acres owned by other entities	-	Remaining 1500 acres "of open space" are owned by other entities	DCPS and other entities own the remaining 16% of park acreage	-	-

NPS Funding for the National Capital Region

The United States Department of the Interior Budget Justifications and Performance Information Fiscal Year 2023: National Park Service includes all FY23 NPS funding requests for the National Capital Region. In the proposed budget, the acreage listed for the National Capital Parks - East (NACE), National Mall and Memorial Parks (NAMA), and Rock Creek Park superintendencies do not match reported acreage by other NPS sources or the 2005 Government Accountability Office survey of NPS properties in the District. According to the Budget Justification document, the NACE superintendency has 12,000 extra acres to stretch its budget across, while NAMA and Rock Creek superintendencies have fewer acres for which to budget. Specifically:

- The NACE portfolio listed in the FY23 budget includes several parks in Maryland as well as "National Capital Parks - Central," which no longer exists. National Capital Parks - Central was the original name for the monumental core's superintendency, which has since been renamed "National Mall and Memorial Parks" (or NAMA).
- The NAMA portfolio listed in the FY23 Budget includes notable memorials and monuments (Martin Luther King, Jr. Memorial, Lincoln Memorial, etc.) as well as "National Mall" but does not list any smaller parks in the NAMA superintendency.
- There is no description of the Rock Creek Park portfolio, indicating that it only includes Rock Creek Park itself and not the smaller parks within the broader Rock Creek Park superintendency. In addition, its listed acreage - 1,755 - is consistent with other descriptions of Rock Creek Park.

Due to these discrepancies, it is difficult to determine conclusively how much is budgeted for each superintendency. However, we speculate that, for the purposes of the budget, the missing acres in NAMA and Rock Creek Park are part of the additional 12,220 acres included under NACE. This means that the DC properties in NACE likely receive even fewer dollars per acre than previously reported.

Based on the acreage and funding totals listed in the Budget Justification document, we calculate the following funding/acre for these groups as follows:

NPS National Capital Region "Units and Groups"	**Acreage Federal**	**FY 23 Request ($)**	**FY 23 Request ($/Acre)**
NACE group **includes NCP-Central	14,568.8	$19,329,000	$1,326.74
National Mall and Memorial Parks group	371.5	$40,748,000	$109,685.06
Rock Creek Park **just includes Rock Creek Park (1,754 acres) not rest of the superintendency	1,755.2	$10,455,000	$5,956.59

Appendix C

How Parks Support Health & the Environment

Parks as Medicine - For Our Mental Health
Greenspace can play an integral role in population-level mental health (Barton & Rogerson, 2017). Accessible parks, just one element of greenspace, serve as both a conduit for the psychological benefits generated through physical activity and as a protective factor against the development of mental illness (Wood et al., 2017). These effects are generated through reductions in stress and the experience of the restorative benefits of contact with nature. Additionally, the 2017 study led by Wood et al. identified a dose-response relationship between the total area of accessible public green space within a neighborhood and positive mental wellbeing, noting that mental wellbeing increased with each additional hectare of parkland within 1.6 km of a home. In Ready2Play, DPR noted in their literature review an increased demand for health, fitness, and connection to nature through parks. This included utilizing urban forests for forest bathing and nature as a healing space. Forest bathing is a well-recognized mental health tool found by studies to have positive impacts on the nervous system, stress hormones, hypertension, pulse rate and anxiety (Park et al., 2010; Ideno et al., 2017; Yu et al., 2017). DPR's largest parks, Oxon Run Park, currently offers "full sensory immersion in the beauty and wonder of nature as part of forest bathing" (DPR 2022).

Parks as Medicine - For Our Social Health
Access to greenspace confers social health and social capital benefits, as well as fosters community resilience. A meta-analysis conducted by Gascon, et al. (2015) identified public greenspaces, most notably parks, as settings that facilitate social interaction and the development of social ties. By enhancing cognitive function in schools and offices, greenspaces can contribute to safer, integrated, and more vital communities (Shepley et al., 2019; Troy et al., 2016; Schwarz et al., 2015). Several studies have demonstrated that greenspaces can mitigate crime and violence specifically, including gun violence in communities, through the promotion of community cohesion, feeling safe to go outside, and increased utilization of outside spaces (Shepley et al., 2019; Branas et al., 2018; Kondo et al., 2017). In Ready2Play, DPR noted the growing importance of parks and recreation centers supporting the social and health services of communities through wellness and resilience hubs, business incubation centers, and creating spaces which spotlight diverse local art, cultural events and commemorative works.

Parks as Environmental Powerhouses - Providing Heat Protection
Heat waves can be deadly for those who are elderly, have low income, are unhoused, or are otherwise unable to access safe inside temperatures. Heat waves not only cause illness and death, but can contribute to reduced labor capacity, leading to job loss for individuals with less stable and flexible work (National Center for Environmental Health, 2022). Urban greenspace is particularly important during heat waves, where it can lower surface temperatures via the shadow effect and evapotranspiration to create urban cool islands (Reis & Lopes, 2019). Due to historical housing covenants, creating urban cool islands is particularly important for communities of color. A study of 108 cities in the U.S found that hotter urban surface temperatures occur in historically redlined neighborhoods (Hoffman et al., 2020). To combat rising urban surface temperatures, the District's 2016 Climate Ready DC Plan identifies urban heat island spots, vulnerable residents, and areas with the greatest potential for cooling as a priority for combatting extreme heat events.

Parks as Environmental Powerhouses - Preventing Stormwater Dangers
Urban greenspace can also enhance municipal stormwater management strategies. Due to the District's highly urbanized environment, rainfall cannot drain naturally and instead runs off impervious paved surfaces and rooftops. On its journey downhill, this runoff picks up contaminants and deposits them into Rock Creek and the Potomac and Anacostia rivers (DOEE 2015). Climate change precipitates heavier and more frequent rainfall which will likely result in sewage-contaminated stormwater flowing directly into our waterways. These pollutants degrade habitats, contaminate surface and groundwater sources, and harm the health of surrounding communities (EPA 2022). Urban greenspaces are an integral component of best management practices to prevent runoff and eliminate pollution of waterways and water sources. Rainfall interception and infiltration by trees, vegetation, and soil, slow down the movement of stormwater and reduce the risks that untreated stormwater poses to environmental and human health (Hoover & Hopton, 2019). Installing more bioretention cells, protecting large open natural spaces as well as parks in densely populated areas, and expanding our urban tree canopy, are all ways the District can utilize its wealth of greenspace and parks to protect public health (EPA 2022). The sustainability goals in Ready2Play include integrating floodable infrastructure and co-beneficial stormwater management practices into their sites. Progress toward these goals will be measured by the number of specifically designed floodable structures and amount of floodwater managed on site, as well as stormwater retention capacity and overall impervious surface area on DPR sites.

Parks as Environmental Powerhouses - Contributing to Reductions in Air and Noise Pollution
There is a long-established relationship between greenspace and reductions in air pollution. Outdoor air pollution is one of the top risk factors for global mortality and particulate matter (PM), or extremely small solid or liquid droplets, are one of the most harmful of these pollutants (WHO 2019). Observations by Irga and Burchett (2015) found local reductions in PM concentrations in urban forest areas in Sydney, Australia and McDonald et al. (2007) modeled PM concentrations in the United Kingdom finding that increasing tree cover alone would reduce concentrations by up to 10%. Furthermore, a meta-analysis conducted by Zupancic et al. (2015) discovered that even small areas of greenspace, such as a green roof or green wall, improved air quality. Reductions in air pollution can reduce the public health burden associated with long-term pollutant exposure and chronic disease outcomes such as lung cancer, chronic obstructive pulmonary disease (COPD), ischemic heart disease, and others (Health Effects Institute 2020). Greener cities can also be quieter cities. Natural vegetation has been used extensively to physically reduce outdoor noise through three major pathways: (1) reflection of sound waves by elements of the plant, (2) absorption of sound waves by elements of the plant; and (3) destruction of sound waves by elements of the plant (Dzhambov & Dimitrova, 2014). Attenuating noise ultimately serves to promote relaxation and overall wellbeing for residents (Yang et al., 2011). A study by Vivanco-Hidalgo et al. (2019) found that people living in areas with less greenspace and higher levels of noise had an increased risk of severe stroke.

Appendix D

Methodology

This report is based on twelve months of research conducted over the course of 2022, including a policy landscape analysis, qualitative interviews, and an academic literature review. The policy landscape analysis included a review of applicable federal and local laws, regulations, and planning documents for the District's greenspace, as well as public meetings and regulatory dockets. The authors conducted qualitative interviews with over three dozen residents, elected officials, organizations, and government agency staff who use, advocate for, or administer programming or projects on District parklands. Interview questions were tailored to each interviewee. Interviews were conducted by video call and all interviews were anonymized. Finally, a literature review related to greenspace and health was conducted.

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