



August 18, 2018

Mr. Mark Schwartz
County Manager, Arlington County
2100 Clarendon Boulevard, Suite 302
Arlington, Virginia 22201

RE: https://arlingtonva.s3.amazonaws.com/wp-content/uploads/sites/31/2018/07/4MRV_draftparkmasterplan.pdf (and hard copy of July 18, 2018)

Dear Mr. Schwartz:

Thank you for the opportunity to comment on the draft Parks Master Plan (PMP) for the Four Mile Run Valley Study Area. This letter, sent on behalf of the Nauck Civic Association, outlines a number of general concerns with the draft plan and includes a lengthy appendix that provides more specific edits.

Overreach

The PMP takes liberties with already agreed-upon elements. For example:

- The Nauck community has repeatedly called for the front of Jennie Dean Park to remain open, unprogrammed green space, without barriers. While the Nauck preferred option for the park was not accepted, we were led to believe that the County would respect this call for open, unprogrammed green space – without barriers – at the front of the park on Four Mile Run Drive. Instead, the PMP imposes several unwanted, and in some instances, offensive elements, such as: a row of “Cherokee Red” trellises/pergola/arbors along the edge of the park; a retaining wall; chain link fencing around the ball field; and netting. This is simply unacceptable.
- PMP states that visibility to Shirlington Dog Park from Four Mile Run Drive is impaired. This is true, but it is not a problem. In fact, opening up visibility would bring unwanted noise and an unwelcome aesthetic to the rest of the community. It also implies a willingness to tear down buildings and businesses. It would hinder the development of an arts and industry district and distract from the industrial character of the area. Considering past comments by the County Board regarding the dog park, this continued promotion of an unwanted and unwelcomed element in the PMP is troubling.
- The PMP clearly states the decision to retain the industrial character of the area, yet the document does not support this decision well. In fact, it offers a competing vision. It is as though the document provides the headline – “Industrial Character” – and then offers plans that oppose the headline. This must change.

- The PMP states that that area should celebrate “the recreational heritage of Arlington County Parks and Recreation.” This is a new, presumptuous item.

Inaccuracies

The appendix to this letter outlines several specific inaccuracies, but we will elaborate on three points here.

- First, the page on site history is baffling. When describing the study area, the PMP discusses Arlington House and Robert E. Lee. What is the historical reference to the study area? The “history” of Nauck is inaccurate and lacking of necessary details. Other parts of the PMP refer to “Green Valley Ball Park” when the formal name of the park (prior to Jennie Dean Park) was Peyton’s Field. On numerous occasions, the Nauck representatives to the Working Group have offered to assist, but have still not been consulted.
- Second, the PMP continually refers to the “heavy use” of the adult softball and youth league play fields in Jennie Dean Park. This is simply wrong. Raw Arlington County data and eyewitness accounting easily attest to this inaccuracy.
- Third, it is inaccurate to state that all park elements will be incorporated north of the Resource Protection Area. A parking lot and the Shirlington Dog Park will remain in the RPA.

Overall

The PMP takes a woeful stance blaming the County Board for its decision to let certain land operate under the Area Plan, instead of Parks. It blames this decision and the land configuration on its inability to meet any other need – programmed or otherwise. Our Nauck community has explained repeatedly how other needs could have been met, but our suggestions were not accepted. Frankly, this blaming and lack of accountability within a public document is embarrassing.

This draft PMP is too-long, redundant, and myopic. After two years of attempting to work through the plans for the study area as a whole, this report often reverts to a “parks-only” view, and an inaccurate one at that.

If you have questions or need additional information, please let me know or contact Robin Stompler, the Nauck Civic Association’s Community Liaison and Vice Chair of the Four Mile Run Valley Working Group.

Sincerely,

Portia Clark
President
Nauck Civic Association

cc: Chikwe Njoku, Arlington County

August 18, 2018

Appendix – Nauck Civic Association Comments on Parks Master Plan

Page 1, green box: First bullet point states that the Working Group will serve as the central forum for community engagement. In reality, this is not what has occurred. Despite representation on the Working Group from multiple commissions, the County chose to use various commissions for community engagement purposes. Most recently, the County plans to convene an “open house” to showcase its PMP without benefit of Working Group input.

Page 1, green box: Last bullet point is written in error. It mistakenly combines two issues of the charge into one. Despite the error, the Working Group has not provided a formal letter or memo indicating support or opposition to the PMP. The Working Group has not made a recommendation on the PMP – pro or con.

Page 2, under Background Key Issues, change “ex-slave...” to a “who was raised in slavery and later became an educator, founding the...”

Page 3, Four Mile Run Stream, first bullet: “within 100’ feet (redundant) of from the top...”

Page 3, Four Mile Run Stream, second bullet: “and interpretation” needs definition. Delete it.

Page 3, Shirlington Dog Park, third bullet: This is not an agreed upon element. Stating “visibility from Four Mile Run towards the dog park – cannot see into the dog park through buildings on South Oakland and South Oxford Streets” implies that it is desirable to tear down the buildings. This is not acceptable. It also expands the impact of the dog park, and its noise, into the residential area, which is also not acceptable.

Page 4, green box: To emphasize, the vision statement “expresses the community’s interest in retaining the industrial character of the area...” The document does not reflect well this statement.

Page 4, first bullet point: “*Celebrate* the area’s industrial character, cultural and recreational heritage, and natural qualities” is odd and understates the strong statement made by the community. The bullet should read: “Keep and amplify the industrial character of the area.” A second bullet point can observe the cultural heritage and natural qualities of the area. We do not know what “recreational heritage” entails.

Page 4, last sentence under Recommendations: Add “... County Board direction to maintain the size, *location*, and character of the Shirlington Dog Park...”

Page 4, under Recommended Alternative for Jennie Dean Park: It is inaccurate to state “At the direction of the County Board.” The Working Session with the County Board indicates that this was not a Board directive. The remaining accounting of how the alternatives were developed and included does not indicate the strong opposition expressed by many Working Group members and members of the public. It gives the appearance that there is unanimity, when there is not.

Page 5, third bullet point: It is not accurate to state that “all park elements will be incorporated north of the Resource Protection Area...” when a parking lot and Shirlington Dog Park will remain in the RPA.

Page 7, under Context and Location: Again, it is not a stated goal to make the Shirlington Dog Park more visible. It is “well hidden” for a reason – to guard against noise and odor. It is also not particularly attractive. Buildings within the Area Plan should not be sacrificed so that the dog park is visible from the street. This was *NOT* agreed to within the Working Group. The dog park, as advocates repeat frequently, is among the most populated dog parks in the world – it does not need increased visibility, especially at the expense of the business and residential community that flanks it.

After attempting to work through the plans for the area as a whole, it is troubling to see this report revert back to a myopic, “parks-only” view. One way this is evident is when the issue of parking is discussed on this page. One would not know that food bank clients and local businesses also utilize the parking areas.

The PMP provides opinion on pedestrian crossings that does not align with solutions expressed in the draft Area Plan. It should also be noted that Arlington Mill Drive is not part of the study area, so references to it are inappropriate.

Under first bullet point: Again, the neighborhood is not interested in a vista to the dog park. This is a new element introduced into this document. It ignores the business community in the Area Plan and the Nauck community’s preferences.

Under second bullet point: Again, this document provides speculative opinion. Stating that “it is evident from footpaths found along the water bank that many desire to be close to the stream and find a way in despite the enclosure” (sic) does not provide an objective analysis of the situation. It provides unsubstantiated information and does not provide counter details on water quality and erosion.

Under third bullet point: There is obvious bias, and anti-business sentiment, in this statement about the “adjacent industrial buildings.” The study area is a light industrial area and, as stated earlier, the industrial character of the area is to remain. To state that “the building faces that abut the edge of the dog park create a stark visual contrast” gives the impression that it is unwelcome and that the dog park vista is paramount (which it is not).

Under fourth bullet point: This bullet point addresses chain link fencing, but the description turns to field scheduling changes. It is also unclear that there has been any “encouraging” for community unorganized use.

Page 7, figure 9: Buses no longer sit in Jennie Dean Park. This photo needs updating. Likewise, “view of recently acquired parcels” is not accurate. It does not depict such “parcels.”

Page 7, figure 8: It has not been determined that “access” should be unfettered.

Page 8, figures 12-16: What are the dates of these photographs? The captions state when accessed, giving the wrong impression these are recent depictions.

Page 8: This page on site history is baffling. When describing the study area, why is there a need to discuss Arlington House and the honoring of Robert E. Lee? It would be more appropriate to discuss

George Washington, if truly giving a historical reference to the study area. Likewise, the “history” of Nauck is inaccurate and lacking of necessary details. For example, stating that Nauck is “the neighborhood to the north of and encompassing Jennie Dean Park” does not recognize the actual boundaries of Nauck, which include property to the south of Jennie Dean Park. It is poorly written and, as we have mentioned numerous times, would benefit from consultation with the Working Group’s Nauck representatives.

Page 11: The second paragraph states that the adult softball and youth league play fields are “heavily used in the evenings and weekends when in season.” This is simply inaccurate. Raw Arlington County data and eyewitness accounting attest to the inaccuracy of this “heavily used” statement.

The third paragraph states that the playground is located in the “shadiest” part of the park. We would suggest the words “most isolated” instead. It is a fabrication to state that the “small open space... just west of the playground... is often used for pregame practice or impromptu sports matches in the evenings.” It appears that some of the prose in this document inaccurately idealizes current uses of the park.

In the Shirlington Dog Park paragraph, please run a grammar check.

Page 11, figure 22: “Pleasant” is a subjective word that should not be used in this description.

Page 11, figure 21: This photo is several years out of date. It should not be used to depict Jennie Dean Park.

Page 12, first paragraph: To state there is a “perceived need” for additional casual use space and then state there are “deficiencies in other programmed park and recreational needs” certainly reflects an opinion that is not substantiated in fact. The use of the term “perceived need” gives short shrift to a well-stated and well-documented community need. To suggest “deficiencies” in the park and recreational needs is questionable without verifiable data. This paragraph is petulant in blaming the appropriation of land to the Area Plan for the lack of additional park and recreational “needs.” As stated on previous occasions, a more creative, innovative use of Jennie Dean Park would have created additional park and recreational opportunities.

It is also disingenuous to suddenly have a regard for the residential community and the desire for casual use space. The Nauck community explained how additional casual use space could be achieved within Jennie Dean Park, but that suggestion was not accepted.

Page 13: The statement, “There is no accurate measure of informal park usage” is noted, so why do other parts of this document flaunt “heavy” usage?

Page 13, Figure 25: It is biased and inaccurate to base park usage, especially the baseball and softball fields, on *reservations*. There is empirical evidence to show this is not an accurate tool for forecasting park and recreation needs. It should not be used in this manner.

Page 15, figure 29: The legend incorrectly states the red line indicates the “study area.” The red line indicates the PMP area.

Page 18: Much of the information on this page is redundant of previous pages, especially with regard to the dog park. A more concise document would be appreciated. This page also unnecessarily repeats site history. It references “Green Valley Ball Park” when the formal name was actually “Peyton’s Field.” The last paragraph states that “the design of new park features will be responsive to African American historical context of Nauck and the development of Jennie Dean Park and incorporate additional design and interpretive references...” The sentence structure needs correcting. It is not clear how the “design” will be “responsive” especially without speaking with the Nauck community.

Page 19: The first sentence, “walkshed of surrounding neighborhoods and Shirlington’s lively mixed use district” disregards that the 4MRV parks referenced are in the Nauck neighborhood – not “surrounding.” The use of the word “lively” to describe a neighborhood is subjective and inappropriate.

Under Vehicular Connectivity: It is more accurate to state “currently access Jennie Dean Park from 27th Street South, just” off of *Shirlington Road*.

Throughout the document, certain words are abbreviated with the acronym placed in parentheses. It is only necessary to do this once. Instead, the document continually explains its abbreviations (e.g., Resource Protection Area (RPA)).

Page 20, second paragraph: The document states correctly that the parking analysis and recommendations are included in the Area Plan. It is redundant here.

Page 20, third paragraph: The document incorrectly states that parking occurs in a grass field across from Location 4. This short-term problem was corrected months ago and is no longer relevant. This “analysis” does not address available parking and signage on Four Mile Run Drive, a significant oversight.

Page 21, first paragraph: There is an indication that the Area Plan and PMP are being developed together, yet the separation of documents and clear divergence of tenor and opinion calls into question the effectiveness of this effort.

Page 21, under Public Outreach: To be clear, the staff did not “initiate” a number of the items listed. In fact, staff was often recalcitrant about these opportunities.

Page 21, under Working Group: Three (3) working group subcommittees were formed – not two (2). The document fails to mention the Arts District Committee. The dog park committee was not formed by the County Board; it was a decision of the Working Group leadership in June 2017. The Jennie Dean Park committee was not formed by the County Board either.

Page 22, top of page: Typo: community. Middle of page: Change “alternatives” to “alternative”

Page 22, green box: More accurate to say working group meetings were *generally* held twice per month.

Page 22, under Community Meetings: “Public comment was also “heard” at the end of each Working Group meeting. It was not “gathered.”

Page 23, second column: “...the addition of “new” park amenities” should be replaced with “updated” park amenities. There are no “new” amenities, as already noted in the introduction of this page it is only “replacement and realignment.”

The statement “addressing the potential for shade” was not a playground issue. Placing in a less isolated environment was paramount.

Page 25, first paragraph: It would be more accurate to state “working group input” as opposed to “working group discussion.” There was little “discussion.”

Page 25, RPA: This page alludes to “notable community values” regarding access and visibility to the stream. Which “community” are you referencing? The Nauck community, which encompasses Jennie Dean Park, did not make this statement. In fact, the values we espoused are not listed here.

Page 26, second column: To be accurate, the majority of Working Group members voted to “recommend to the County Board that it direct staff to develop an alternative design for Jennie Dean Park (that incorporated) continuous open/casual use space along Four Mile Run Drive; places the diamond fields toward the back of the park, away from Four Mile Run Drive; place the playground in a more accessible location; add a promenade allowing connectivity throughout the area; and maintaining an industrial character in Jennie Dean Park.” The vote was 12 (for), 10 (opposed), 2 (abstain). Motion carried. The statement in the document needs to be presented accurately.

Again, the County Board did not direct that a new subcommittee be formed.

Page 26 and 27, the charge to the Jennie Dean Park committee has not been relayed accurately. The charge stated: “The Committee will review and evaluate existing alternative concept plans for Jennie Dean Park, giving due consideration to issues, concerns, and recommendations that have been raised by the community. A new concept plan recommendation may be developed but must include all elements (casual use space, large and small diamond fields, tennis and basketball courts, playground, restroom, and picnic area) currently in the park.”

Page 27, first paragraph: The final Jennie Dean Park committee report was due on March 21, 2018, as stated in the charge. It was posted by the deadline date.

Page 29, second bullet: The JDPC did not express concerns with this option, the chair of the JDPC did. It is also disingenuous to unevenly present the concerns about each option.

The vote of the full Working Group was 14-9, and should be stated as such.

Page 29, second column: Redundancy (again).

Page 30: The County Board did not direct the creation of the dog park committee. This paragraph is redundant.

Page 30, green box: The document states that the recommendations are “affordable” yet no cost data has been presented. This should be deleted until cost data is available, plans provided, and “affordability” determined. “Management” is misspelled.

Page 31: The County Board did not state during the work session that the Shirlington Dog Park recommendations be adopted as part of the PMP.

The County Board did state that the location of the dog park should remain the same. "Location" should be added the the end of the first column.

Page 32, first column: The LaPorte property is no longer "recently" acquired.

Page 32, figures 56 and 57: Trellises along Four Mile Run Drive are not in keeping with the industrial character of the area and create an unwelcoming barrier. They should not be depicted.

Page 34, end of first column: This bullet points notes the relocation of the "day labor" site but the document has not yet introduced the "Shirlington Employment and Education Center" and its affiliated site. It appears dismissive of this neighborhood component.

Under the second column: Again, this document is fickle and redundant in its use of information. The top two bullet points discuss parking (again), even though that has been passed to the Area Plan.

Reference to the African American heritage of the neighborhood continues to espouse how this heritage will be incorporated, but no conversations have been conducted with the Working Group's Nauck representatives.

The bullet beginning, "outside of the RPA," does not make sense grammatically.

Under Shirlington Park, here there is a different emphasis provided for Shirlington Park than espoused on page 29. On page 29, the park emphasizes a combination of art and nature. On page 34, the park emphasizes the "idea that Four Mile Run Trail provides an opportunity to educate visitors about the nature of Four Mile Run." On page 35, Shirlington Park is now the "gateway to the arts and recreational uses." Not that these elements are necessarily mutually exclusive, but different parts of the document should not state differing concepts.

Page 36, there is no mention of the concerns with a minor gateway established at the narrow intersection of Four Mile Run Trail and Shirlington Road pedestrian/bikeway. The safety concerns should be acknowledged so they may be addressed.

Page 38: This page provides a redundant look at the Working Group. It has several inaccuracies and missing components that require correction. If the County feels the need to continue its repetition of information in this PMP, we would suggest directly copying from one section to the next. This document appears to have been written by several people with no coordination or appropriate editing.

Page 39, fifth bullet point: States that the 4MRV Parks will "respond to community park and recreation needs." Please define "community." At this stage, the County has not been responsive to "the community" where the parks are located, Nauck.

Page 42, first paragraph: Jennie Dean Park, in the early 20th century, was formally known as Peyton's Field, not Green Valley Ball Park.

This paragraph also states that Four Mile Run comprises Arlington's only riverfront public access. Yet, Arlington has public access to the Potomac River too.

Page 42, second paragraph: It was not determined that the study area should celebrate “the recreational heritage of Arlington County Parks and Recreation.” This area should not become a vanity project for DPR.

Page 42, Guidelines: This description is well-stated. Figure 71, however, does not reflect the industrial characteristics described in the guidelines. For example, where is the steel and concrete?

Page 46, figure 75: The photographs are too small and dark to determine detail. Also, if comparing 1934 to 1955, is there relevance to 2018?

Page 48, first paragraph: Referencing Shirlington Park as Shirlington Village’s “front yard” and Jennie Dean Park as Nauck’s “backyard” and the dog park as serving “both” does a disservice to the community and to the process as we have understood it. First, all parks are located in Nauck. Second, parks supposed to be for everyone. This study was supposed to be planned as a whole. The analogy should be deleted.

Page 48, second paragraph: The description does not appear to mention the new arrows at Four Mile Run Drive and Shirlington Road (figure 79). This element is new.

Page 50, first bullet point: It is not clear what “honest” materials represent here. As stated on page 42, this area should include steel and concrete for the industrial character. The “honest” aesthetic, like mid-century modern simplicity, is not the vision. Modern industrial is.

Under figure 83, recognizing there are many possible photographic examples, the chain link fence is not a desirable example.

Page 52, figure 90: Again, the photographs do not match the stated industrial character. These examples are either too ornate (top) or too rustic (below).

Page 52: The first paragraph and last paragraph appear to contradict one another. The first states that the study area is “perceived as a cohesive system” and the last acknowledges a difference among areas and variation “due to the distinctly different character of the areas and their proposed uses.” The variation is acceptable, but the wording appears contradicting.

With all the possible examples of industrial design available, it is troubling that this document repeats the same photographic examples, some of which are not even indicative of “industrial.”

Page 54, park entries: The first bullet point notes that park entries are accessible to all modes of transportation. The minor gateways on Four Mile Run Drive do not appear open to cars or motorized vehicles.

The sixth bullet point introduces new items that have not been accepted. First, the arbor structure (trellises) along Four Mile Run Drive are unacceptable. They are not of an industrial nature and create additional barriers to the neighborhood. Also, as stated previously, not one of the Nauck representatives to the Working Group have been consulted on the “interpretative waysides” for introducing the history of Jennie Dean Park. The term “located within gateways” appears similar to earlier offensive language, captured by the chair of the Jennie Dean Park Committee report, that the

African American heritage be incorporated into the park's fencing design. We, again, stress the importance of speaking with the Working Group representatives to the Nauck community.

Under visual gateways, first bullet: There has been no agreement on the addition of trellises. This element should be removed.

Page 56, first paragraph: Once again, the use of trellises (an arbor) is not acceptable. It is not in keeping with the industrial character of the area and it creates an unwanted barrier at the front of the park.

Similarly, the Nauck community has been abundantly clear – no barriers, no walls at the front of the park. Yet, page 56 displays walls and barriers at the front of the park.

Page 56, figure D: No. Again, this “Cherokee red” trellis is not in keeping with the character of the neighborhood. It creates a barrier at the front of the park. It is troubling to have to repeat this information, especially since this element was added after the policy framework approval and after the Nauck community repeatedly called for no barriers at the front of the park.

Page 57, first bullet: The 75 foot set-back from Four Mile Run Drive should be from outside the foul ball post. The light post figure has type too small to read. Fifth bullet point: These plans have evolved from no fencing to removable fencing and now, as the neighborhood feared, the guidelines propose chain link fencing and gates. This continues to be unacceptable to the Nauck community and destroys the entrance to the park. Last bullet: Again, the references to Nauck and the Green Valley Ball Park have not been discussed with the Nauck representatives.

Page 59, bullet points: Again, the arbor along Four Mile Run Drive is an unacceptable element. It is not in keeping with the industrial character of the area and it creates a barrier at the front of the park. It is not “attractive” and should be eliminated.

Page 65, second bullet: Another new development, to encourage high speed bicyclists to use the W&OD trail? This has not been discussed and calls into question the safety of the pedestrian/neighborhood uses of the W&OD. Especially considering, the third bullet, where the Four Mile Run Trail will be separated between wheeled vehicles and casual/social uses.

Page 67, third bullet: typo in first line.

Page 68: An update photo is needed.

Page 69: Updated photo is needed of South Nelson Street (cars no longer park on the grass).

Page 69, public art: There are a multitude of references to the desire for public art throughout the PMP, yet it is clear the resources do not meet the stated ambitions.

Page 71, third bullet: Despite assurances to the contrary, protective netting is required along 1st and 3rd baselines of both fields? This adds more barriers to the front of the park. Fifth bullet point: Again, despite assurances to the contrary, additional barriers – retaining walls – are to be erected in the open space area in the front of the park? This is unacceptable and negates assurances the Nauck community received for open space at the front of the park.

Sixth bullet: Again, the references to Nauck and the Green Valley Ball Park have not been discussed with the Nauck representatives.

Page 71, under streetscape: Again, the proposed trellises/arbor/pergola (the name changes in different parts of the document) is unacceptable. It is out of the industrial character of the neighborhood and it creates an unwanted barrier at the front of the park. A “Cherokee red” design that incorporates interpretive media about Nauck and Jennie Dean Park is offensive.

Page 72, casual use spaces: Using the definition given here for casual use space, the front of Jennie Dean Park, with the trellises, retaining walls, seating, chain link fences, and netting, will not have the open, casual use space long requested by the Nauck community.