



## Executive Director's Recommendation

Commission Meeting: June 6, 2019

---

<b>PROJECT</b> <b>Georgetown Canal Plan</b> Chesapeake & Ohio Canal National Historical Park Located between 28 <sup>th</sup> and 36 <sup>th</sup> Streets, NW Washington, DC	<b>NCPC FILE NUMBER</b> 8078
<b>SUBMITTED BY</b> United States Department of the Interior National Park Service	<b>NCPC MAP FILE NUMBER</b> 00:00(00.00)44939
<b>REVIEW AUTHORITY</b> Federal Projects in the District per 40 U.S.C. § 8722(b)(1) and (d)	<b>APPLICANT'S REQUEST</b> approval of comments on concept plans
	<b>PROPOSED ACTION</b> Approve comments as requested
	<b>ACTION ITEM TYPE</b> Staff Presentation

---

### PROJECT SUMMARY

The National Park Service (Department of the Interior) in cooperation with the Georgetown Business Improvement District (BID), Georgetown Heritage, and District Office of Planning (DCOP) is developing a plan to enhance the one-mile portion of the Chesapeake & Ohio (C&O) Canal National Historical Park (NHP) in Georgetown, from the zero-mile marker on the east (28th Street, NW) to the Alexandria Aqueduct on the west (36th Street, NW). The Georgetown Canal, an NPS property, is one of the most unique and special places in Washington, DC - beloved by residents and visitors alike.

The C&O Canal is a National Historical Park (NHP) and District and was listed in the NRHP in 1979. NPS will draft an Environmental Assessment and Section 106 Assessment of Effects Report and is requesting Concept Review on proposed improvements to a one-mile segment of the canal.

The purpose of the project is to develop a plan to enhance the one-mile portion of the Chesapeake & Ohio (C&O) Canal National Historical Park (NHP) in Georgetown. The plan will focus on addressing deferred maintenance issues and related safety and accessibility concerns associated with the towpath; improving connections between Georgetown and the C&O Canal towpath; enhancing visitor experience through increased signage; and optimizing underutilized areas.

The project is needed to provide a coordinated approach to address the following concerns:

- Portions of the towpath are uneven, narrow, and poorly lit, creating potential safety hazards;
- Visitors with limited mobility can only access the towpath from Grace Street, NW (south of the canal). All other access points are not compliant with the Architectural Barriers Act Accessibility Standards (ABAAS);

- Many access points to the towpath are not readily visible or unknown due to lack of signage;
- The park desires to expand opportunities for interpretation, education, and cultural programming;
- The park has limited amenities and facilities for visitor comfort such as seating, drinking fountains, and restrooms; and
- Several plazas along the canal are underutilized and could be developed to provide additional recreational activities.

The project plans include modifications to the existing canal towpath as well as five key places adjacent to the towpath. Proposed changes range in level of intensity, with Option A proposing minimal changes, and Option B proposing more significant changes. This phase of review is broad in nature; focused on the placement of programmatic and circulation elements. Project details including materials and lighting will be assessed when the applicant returns for Preliminary and Final Review. James Corner Field Operations is serving as the landscape architect for the project.

## KEY INFORMATION

- The C&O Canal was engineered by James Geddes and Nathan Roberts, and the Georgetown Level of the canal was constructed between 1828 and 1831.
- The NPS acquired the canal from Georgetown to Seneca (22-miles) for recreational use in 1938.
- In 1961, President Eisenhower proclaimed the C&O Canal a National Monument.
- The C&O Canal was dedicated as a National Historical Park (NHP) in 1971 as is located within Rock Creek Park and the Georgetown Historic District (DC Landmark, National Register of Historic Places, and National Historic Landmark).
- In 1976, the NPS released a General Plan for the C&O Canal which provided general development guidelines.
- In 1977, the Georgetown Park Plan by Lockman Associates/Architects guided changes for parks and plazas adjacent to the C&O Canal.
- The C&O Canal is a National Historical Park (NHP) and District and was listed in the National Register of Historic Places in 1979, with a period of significance from 1828 to 1960.
- The project is organized by the following components:
  - Towpath
  - Five Key Places (from east to west)
    1. *Mile Marker 0*, including the K Street Bridge
    2. *The Rock Creek Confluence*
    3. *The Locks*
    4. *The Market Plazas*, including the *Wisconsin Avenue Cutout*
    5. *The Aqueduct*, including the *Stone Yard*
  - For clarity, staff will present the Five Key Places as interventions at seven locations
- The Commission is a cooperating agency and consulting party for compliance with the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).

- 
- The project will re-introduce the interpretive mule-drawn boat rides, similar to the one currently offered at the Great Falls segment of the C&O Canal.
  - The SHPO shared a letter dated April 24, 2019, with the following comments and suggestions for the project:
    - Limit any intrusions into or over the canal prism.
    - Avoid paving the towpath.
    - *Mile Marker 0's* Option B is an appropriate approach.
    - *The Market Plaza's* Option B boardwalk extending over the canal is problematic
    - *The Wisconsin Avenue Cutout* changes to the wall and obelisk could pose adverse effects.
    - *The Aqueduct's* Option B is not recommended.
- 

## RECOMMENDATION

**Supports** the NPS goals for improving the canal's safety, accessibility, connections to the surrounding community, visitor experience, and educational and interpretive programming, along a one-mile stretch from Mile Marker 0 to the Alexandria Aqueduct.

**Notes** that over the years piecemeal modifications were made to the canal towpath and adjacent properties to address deficiencies, however years of heavy use and aging infrastructure warrant improvements.

**Finds** that the goals for recreation, tourism, and public gathering need to be balanced with historic preservation and maintaining the canal's natural and industrial character which make it a unique and intimate experience.

**Notes** that staff's analysis of the alternatives is organized around proposed improvements to the towpath, access to the towpath, and specific interventions at seven locations along this stretch of the canal.

### Improvements to the Towpath

**Supports** the NPS goals for improving the canal's safety, accessibility, and connections to the surrounding community. NPS recognizes that the proposed improvements will make the park more user friendly and enjoyable thereby attracting more visitors to the park.

**Notes** that today the majority of the towpath is crushed gravel with a vegetated edge along both the canal prism (the open channel which forms the canal waterway) and the retaining walls. The current towpath ranges from 2 to 10 feet in width. The existing condition contributes to its authenticity and informal character but also poses challenges for people with limited mobility.

**Notes** that in this one-mile stretch, the towpath runs continuously on the north (berm) side of the canal and is discontinuous on the south (river) side.

**Notes** the towpath retains historic integrity of location from 29<sup>th</sup> to 34<sup>th</sup> Streets NW (on the north or berm side of the canal). The towpath retains historic integrity of material (brick) at Lock No. 3 between 30<sup>th</sup> and Thomas Jefferson Streets. The canal prism retains integrity of historic location and design (dimensions) despite some changes to the prism wall materials which are intermixed with patchwork repairs of dressed stone, brick, and rubble stone.

**Finds** that there is a way to provide for universally accessible (ABAAS-compliant) routes and new programming (i.e. interpretive mule-drawn boat rides) while maintaining the historic integrity of the site.

**Notes** that the applicant is proposing two options for towpath improvements: Option A levels the towpath and removes the vegetation. Option B levels the towpath, removes the vegetation, and cantilevers the towpath over the canal prism wall in locations to be determined, as needed.

**Notes** that the applicant is proposing universally accessible (ABAAS-compliant) ramps that connect to existing pedestrian bridges that cross over the canal.

**Recommends** that the applicant consider applying a hybrid of the two options which would help to maintain the towpath's existing character while creating a universally accessible (ABAAS-compliant) route. Specifically:

- If possible, alternate between the north and south towpaths, depending on which side is wider, to achieve the ABAAS-compliant route through the historical park.
- Preserve the existing towpath character in areas where the ABAAS-compliant route is not designated.
- Apply towpath Option B in limited locations that are not highly visible such as under bridges to create laybys; places where a person with limited mobility could wait for a mule and guide to pass by.

**Requests** additional documentation on the following at Preliminary Review:

- Existing and proposed circulation diagrams showing pedestrian, bicycle, guided mules, and universally accessible route(s).
- Details of a hybrid approach to the towpath; showing where towpath Options A and B would be applied along the canal's length, as well as proposed materials and dimensions.

### Access to the Towpath

**Notes** that the canal and towpath comprise a narrow open space situated on a steep slope confined between buildings and retaining walls, which results in challenging grade changes and connections from streets, bridges, and plazas to the canal towpath.

**Finds** that elevators are needed to make universally accessible (ABAAS-compliant) connections from surrounding streets, bridges, and plazas to the canal towpath.

**Supports** the proposed elevators and recommends locating them in an inobtrusive manner, such as within or adjacent to existing buildings or screened behind vegetation.

**Supports** the proposed ramp locations as they improve universal accessibility and have minimal impact on the historic fabric.

**Requests** additional information regarding the elevator proposed at the western end of the site, near the Key Bridge.

### Interventions at Seven Locations

**Notes** that NPS has proposed changes at seven locations along the one-mile stretch of the canal which include from east to west: 1) *Mile Marker Zero*, 2) *The Rock Creek Confluence*, 3) *The Locks*, 4) *The Wisconsin Avenue Cutout*, 5) *The Market Plazas*, 6) *The Stone Yard*, and 7) *The Aqueduct*. There are two options for each location (with the exception of the Rock Creek Confluence which only has one option). Option A is minimal change and Option B is more significant change.

**Provides** the following comments for *Mile Marker Zero*:

- **Notes** that this currently underutilized area contains the zero-mile marker for the entire 184.5-mile C&O Canal trail.
- **Notes** that contributing resources here include the Waste Gate ruins, the Tide Lock, the Mole (earthen peninsula), and the Rock Creek Basin.
- **Finds** that this area can support more significant change, as shown in Option B, and has less potential to impact historic character.
- **Finds** that the addition of the K Street Bridge, as shown in Option B, enhances bicycle connections between the K Street cycle track and Rock Creek Park Trail.

**Provides** the following comments for the *Rock Creek Confluence*:

- **Notes** that this area joins the Georgetown Level of the canal with Rock Creek.
- **Notes** that contributing resources here include the Rock Creek Basin, the Canal Prism, the Towpath, Lock 1, Boat Basin 1, and the 29<sup>th</sup> Street Bridge.
- **Finds** that this area can support minimal change, as shown in Option A, and has more potential to impact historic character.

**Provides** the following comments for the *Locks*:

- **Notes** that this area is the location of the NPS C&O Canal Visitor Center and that the lock and canal walls were recently restored.
- **Notes** that contributing resources here include the Towpath, Lock 3, Boat Basin 2, Boat Basin 3, 30<sup>th</sup> Street Bridge, Thomas Jefferson Street Bridge, Lock 4, and the Retaining Walls (mile 0.51 to 0.61) and (mile 0.67 to 1.07).
- **Finds** that this area can support more significant change, as shown in Option B, to meet NPS Visitor and Education Center space and program needs.

**Provides** the following comments for the *Wisconsin Avenue Cutout*:

- **Notes** there is a large grade separation between Wisconsin Avenue and the canal towpath.
- **Notes** that contributing resources here include the Towpath, the Canal Prism, the Water Intake, High Street Bridge (Wisconsin Avenue Bridge), Commemorative Obelisk (including its location), and the Retaining Walls (mile 0.51 to 0.61 and mile 0.67 to 1.07).
- **Finds** that this area can support minimal change, as shown in Option A, and has more potential to impact historic character.
- **Recommends** that the applicant consider relocating the elevator to a less visible location that does not impact the historic location of the Commemorative Obelisk, as shown in Option A.
- **Finds** that the Stone Archway and Seating Steps do not create a welcoming place for pedestrians to linger.
- **Recommends** the applicant evaluate the usage and need for the Stone Archway and Seating Steps and consider options without these elements while providing ample circulation for elevator and stair egress.

**Provides** the following comments for the *Market Plazas*:

- **Notes** that this area is a spatially constrained section of the canal, tightly framed by buildings three to eight stories tall. The Market House Plaza to the north and the Fish Market Square to the south provide open plaza areas for gatherings and activities.
- **Notes** that contributing resources here include the Towpath, the Canal Prism, the Potomac Street Bridge, the Water Intake Ruins, and the Retaining Walls (mile 0.51 to 0.61 and mile 0.67 to 1.07).
- **Supports** the location for the proposed elevator at the Market House Plaza adjacent to Georgetown Park building turret.
- **Finds** that Options A and B for the Market House Plaza have strengths and weaknesses:
  - Option A protects the historic character, particularly the north retaining wall framing the canal, and maintains level plaza area for outdoor programming and events. However, it does not provide a strong north-south visual and spatial connection between the plazas.
  - Option B provides a north-south visual and spatial connection between the two plazas as well as additional seating space for pedestrians. However, it has more potential to impact historic character, particularly the north retaining wall framing the canal. Option B also impacts circulation and service routes on Potomac Street NW which provides access to adjacent buildings and businesses.
- **Requests** additional documentation on the following to help determine a preferred approach:
  - The feasibility of constructing Option B's terraced seating steps and related improvements (access reconfigurations for the Georgetown Market House and surrounding buildings and regrading along Potomac Street NW).
  - How visitors will use and experience Options A and B.
  - Visualizations of the proposed designs for Options A and B.

- **Finds** that the proposed Fish Market Canopy at Fish Market Square overwhelms the intimate space that exists today.
- **Recommends** the use of temporary canopy structures when needed.

**Provides** the following comments for the *Stone Yard*:

- **Notes** that this area has a wide towpath and adjacent vegetated open space south of the canal prism (riverside).
- **Notes** that contributing resources here include the Towpath, the Canal Prism, the Frederick Street Bridge (34<sup>th</sup> Street Bridge), Dual Water Intake, and the Retaining Walls (mile 0.51 to 0.61 and mile 0.67 to 1.07).
- **Finds** that this area can support minimal change, as shown in Option A, and has more potential to impact historic character.
- **Recommends** that the applicant consider relocating the kayak boat launch from the Stone Yard to the Aqueduct area to avoid potential conflicts between the floating dock and its associated recreational programming and the interpretive mule-drawn boat circulation.

**Provides** the following comments for the *Aqueduct*:

- **Notes** that this area begins a transition from the canal's urban condition on the east to a more naturalized condition on the west, more typical of the majority of the C&O Canal.
- **Notes** that contributing resources at the Aqueduct include the Towpath, the Canal Prism, the Alexandria Aqueduct Abutments, the Washington Canoe Club, and the Retaining Walls (mile 0.51 to 0.61 and mile 0.67 to 1.07).
- **Finds** that this area can support minimal change, as shown in Option A, and has more potential to impact historic character.

### General Comments

**Requests** that as plans are further developed, the applicant provide details to include:

- Material selection
- Lighting design
- Location and design of wayfinding signage
- Stormwater management
- Location of tree removal and plantings

## PROJECT REVIEW TIMELINE

<b>Previous actions</b>	<b>None</b>
<b>Remaining actions</b> (anticipated)	– Preliminary Review – Final Review

---

## PROJECT ANALYSIS

### Executive Summary

The project provides needed improvements to the C&O Canal National Historical Park (NHP) to achieve NPS goals including safety, universal accessibility (ABAAS-compliance), connections to the surrounding community, and improved visitor experience and educational and interpretive programming. The applicant is presenting two options for these improvements; Option A and Option B. Option A proposes minimal changes. Option B proposes more significant changes. Generally, Option A has less potential to impact historic character than Option B, although this varies with location and context.

Staff's analysis of the alternatives is organized around proposed improvements to the towpath, access to the towpath, and specific interventions at seven locations along this stretch of the canal. Staff finds that a mixture of Options A and B is appropriate for balancing NPS goals with historic preservation.

### Analysis

The C&O Canal National Historical Park is a historic resource that is currently used for historical interpretation as well as passive and active recreation by visitors and tourists. The C&O Canal was first a working canal that served various business and industries in Georgetown from the early 1800s into the 1900s. The canal's unique history and use inform its current gritty industrial character and creates an authentic space that elevates its uniqueness within Georgetown. However, over the years piecemeal modifications were made to the canal towpath and adjacent properties to address deficiencies. Years of heavy use and aging infrastructure warrant improvements.

As acknowledged by the NPS, the plans for the Georgetown Level of the C&O Canal NHP must be developed in a matter that addresses the identified needs, while also preserving the historic character and cultural significance of the C&O Canal NHP and the Georgetown Historic District. Like several other park planning projects currently underway in the District, the challenge is finding the right balance between improving the function and program of the park and historic preservation.

Overall NCPC staff finds that different areas within the project boundary merit different levels of intervention based on their historic significance. Those that have maintained more historic integrity, such as the aqueduct, bridges, towpath, locks, and various small-scale features, require a greater level of preservation. NCPC staff encourages NPS to avoid significant changes to the character defining features of the canal, as established in its 1979 National Register Nomination and the additional documentation developed in 2014, and the 2018 Cultural Landscape Inventory (CLI), in particular the towpath, canal prism, and landscape and building retaining walls, especially if it has not already been altered.

NCPC staff seeks greater clarity regarding the need for more dramatic changes to areas with historic integrity. The NPS estimates that the C&O Canal NHP receives 1.7 million visitors

annually (averaging 8,000 daily weekend visitors and 3,500 daily weekday visitors). The purpose of the project with regard to maintaining or increasing visitorship is an important discussion. The NPS should be clear about the purpose of the project in this regard and identify the carrying capacity of the C&O Canal NHP.

In general, we find that the project team has developed a wide range of alternatives that will lead to an informative analysis. There are elements from each alternative that have merit and others that appear to have an adverse impact on the canal's historic integrity and character. As such, a hybrid approach may be necessary.

NCPC staff understands that much of the detail was removed from prior alternatives in order to focus on the broader design, circulation, and programmatic changes. However, staff notes that because our comments focus on broader issues, we encourage the applicant to consult with NCPC staff as the design is further developed so that we can better understand how the proposed plan changes the existing character of the canal. The following comments on the proposed alternatives are organized similar to the proposed design framework in the plan, including the towpath, access to the towpath, and the interventions at seven locations.

### **Improvements to the Towpath**

Today the towpath is a historic and recreational corridor, used by pedestrians and bicyclists, and offers a contemplative visitor experience within its historic context as an industrial and transportation district. The width, material, and character of the path varies between Rock Creek to the east and the Alexandria Aqueduct to the west. Some segments have been altered over time while others are truer to their historic origins. NCPC staff finds that any proposed changes to the path should be evaluated based on potential adverse impacts to the canal and its character defining features as well as the need and benefit of proposed improvements to the path.

Within this one-mile stretch of planned improvements, the towpath runs continuously on the north (berm) side of the canal and is discontinuous on the south (river) side. Today, the majority of the towpath is crushed gravel with a vegetated edge along both the canal prism (the open channel which forms the canal waterway) and the retaining walls. The current towpath ranges from 2 to 10 feet in width. The existing vegetated edge on both sides of the path provides a soft buffer between the narrow corridor and visual safety cue for users to avoid falling into the canal. The existing condition contributes to its authenticity and informal character, reflecting what was once an industrial location, but also poses challenges for people with limited mobility.

Staff notes that the towpath retains historic integrity of location from 29<sup>th</sup> to 34<sup>th</sup> Streets NW (on the north or berm side of the canal). The towpath retains historic integrity of material (brick) at Lock No. 3 between 30<sup>th</sup> and Thomas Jefferson Streets. Staff notes that, according to the 2018 CLI, neither the crushed gravel material nor vegetation contribute to the towpath's historic integrity, however it has defined the towpath's informal character periodically for at least 100 years (as documented in historic photographs) The canal prism retains integrity of historic location and design (typically measuring 60 feet wide at the top, 48 feet at the bottom, and 6 feet deep) despite some changes to the prism wall materials which are intermixed with patchwork repairs of dressed stone, brick, and rubble stone.

Today, three pedestrian bridges cross the canal waterway and provide connections between the north (berm) side of the canal and the south (river) side of the canal. Two of these bridges are located near the Market Plaza location, aligned with Potomac Ave NW and 33<sup>rd</sup> Street NW. The third bridge is located at the Stone Yard location, aligned with 34<sup>th</sup> Street NW. Staff notes that the applicant is proposing making all three bridges universally accessible (ABAAS-compliant) by connecting accessible ramps.

NPS proposes two alternatives for the towpath:

Towpath Option A levels the grade, removes the vegetation, and adds a small curb to the canal edge. This is an acceptable solution for providing additional egress width where the existing towpath does not meet universally accessible (ABAAS-compliant) dimensions.

Towpath Option B is similar to Option A, but also cantilevers the walking surface over the canal prism wall in certain locations to be determined, as appropriate. Staff finds that Option B is a dramatic character change that could adversely affect the canal's historic integrity. Staff finds that Option B would not be an acceptable solution for long stretches of the canal. If Option B is necessary for ABAAS-compliance, then the applicant should explore other options including only using Option B in short segments (functioning as a laybys) located in less visible location preferably under bridges so the cantilevers are less noticeable.

Staff finds that in other historical park locations, the NPS has provided universal access to a park resource by identifying one ABAAS-compliant route through the site. Staff suggests that the applicant consider this approach for the towpath in order to minimize adverse effects to this historic resource. Staff suggests that the applicant consider applying a hybrid of options to the towpath which would maintain the existing character of the towpath in several locations while creating an ABAAS-compliant route. Specifically:

- If possible, alternate between the north and south towpaths, depending on which side is wider, to achieve the ABAAS-compliant route through the historical park.
- Preserve the existing towpath character in areas where the ABAAS-compliant route is not designated.
- Apply towpath Option B in limited locations that are not highly visible such as under bridges to create laybys; places where a person with limited mobility could wait for a mule and guide to pass by.

NCPC staff finds that any alterations to the width of the towpath, width of the canal, changes to the canal prism walls, or modifications to the paving materials could create adverse effects on this National Historical Park. We note that some proposals (such as changing the landscaped edge to a curbed edge) would not alter the width of the canal and could be reversible per the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. Increasing the width of the trail with a cantilever over the canal, however, would permanently change the character, width of the canal, and construction of the canal prism walls. To better understand such impacts and the rationale for improvements, we request the following information:

- Existing and proposed circulation diagrams showing pedestrian, bicycle, guided mules, and universally accessible route(s).

- Details of a hybrid approach to the towpath; showing where towpath Options A and B would be applied along the canal's length, as well as proposed materials and dimensions.

So that staff and the public can better understand how proposed towpath alterations relate to circulation, staff requests a circulation diagram showing proposed routes for pedestrians (including those with limited mobility), bicyclists, and guided mules. In addition, staff is requesting that the NPS explore how to balance historic preservation with universal accessibility (ABAAS-compliance) and bicycle and guided mule circulation.

The design team should consider the fundamental relationship between the elements that compose the towpath. The segments where the towpath is physically constrained on the western end of the site, such as the *Wisconsin Avenue Cutout* and *Market Plazas* should have an approach that meets universal accessibility requirements with minimal disturbance to the towpath and canal prism walls. Areas of the towpath that have fewer physical limitations, toward the east (north/berm side) and west (south/river side) ends of the site, provide more opportunities for improvements while maintaining the existing character.

The concept plan includes several options for the towpath width and boardwalks/docks for the area defined as the *Wisconsin Avenue Cutout* and *Market Plazas*. NCPC staff finds that this area is most sensitive to change and vulnerable to adverse impacts on the historic setting due to physical constraints. We find that the *Stone Yard* and *Aqueduct* offer more flexibility given the more generous width of the towpath on the south (river) side. In addition, staff suggests balancing the proposed changes to the towpath width or material with any proposed additions of boardwalks or docks to minimize intrusions into the canal prism and waterway.

Finally, NCPC staff supports the use of materials that are compatible with the historic materials already present and considered character-defining features but does not support introducing materials that would give the public a false sense of history. Staff suggests evaluating the ground surface material potential to guide and decelerate towpath traffic.

### **Access to the Towpath**

Today, the Georgetown Level of the canal and towpath sits lower than the surrounding urban fabric. This is due both to the raising of the grade of M Street in the mid-1800s as well as urban infill development along the canal edges; including the development of Georgetown Park in the 1980s.

Staff notes that today the canal and towpath comprise a narrow open space situated on a steep slope confined between buildings and retaining walls, which results in challenging grade changes and connections from streets, bridges, and plazas to the canal towpath. In order to provide universal (ABAAS-compliant) access, elevators and ramps are needed to connect visitors with limited mobility to the towpath level.

Therefore, staff supports the addition of elevators, particularly when they are located in an inobtrusive manner, such as within or adjacent to existing buildings or screened behind vegetation. Specific comments regarding the elevators proposed at the *Wisconsin Avenue Cutout* and the *Market Plazas* can be found in their respective sections. During consultation, a third elevator was

discussed at the western end of the site. Therefore, staff is requesting additional information regarding this elevator located in the vicinity of the Key Bridge.

The applicant is proposing universally accessible (ABAAS-compliant) ramps that connect to proposed elevators and existing pedestrian bridges. Staff supports the applicant's ramp locations which have minimal impact on the historic fabric as they are generally located where ramps exist today.

### **Interventions at Seven Locations**

NPS proposes interventions to public spaces along the length of the canal. Overall, NCPC staff supports providing active and passive recreational opportunities when they enhance the unique historic and scenic features of the canal and improving the canal's pedestrian connectivity to the local and regional network of trails along the Rock Creek Park and the Potomac River. However, the challenge is finding the right balance between improving the function and program of the park and historic preservation.

The applicant identified five key places in the concept plan. For clarity, this analysis organizes these as interventions at seven locations. In addition to the No-Action alternative, the applicant identified two Options (A and B) for each location (with the exception of the Rock Creek Confluence which only has one option). Generally, Option A proposed minimal change and Option B proposes more significant change. The following analysis moves along the project site from east to west and address the proposed interventions at seven locations.

The analysis recognizes that each area has unique sensitivities and some merit greater interventions than others. For example, eastern areas of the canal, such as the *Mile Marker 0*, offer greater opportunities and flexibility for more significant interventions, while segments toward the west, including the *Wisconsin Avenue Cutout*, the *Market Plazas*, and the *Aqueduct* require a more conservative approach and careful preservation treatment.

#### **1) Mile Marker 0, including the K Street Bridge**

As the beginning of the trail, NCPC staff welcomes the opportunity to provide a significant intervention to enhance this unique gateway that offers an experience that is distinct from the corridor-like experience of the Georgetown Level of the C&O Canal. Staff notes that this area is currently underutilized, though it contains the zero-mile marker for the entire 184.5-mile C&O Canal trail. Staff notes that contributing resources here include the Waste Gate ruins, the Tide Lock, the Mole (earthen peninsula), and the Rock Creek Basin.

Overall, staff finds that this area can support more significant change, as shown in Option B, and has less potential to impact historic character. Staff supports enhancing trail circulation and access to the Thompson Boat Center and Rock Creek Park Trail while providing waterfront views, as shown in Options A and B, including the Mile Marker 0 Bridge and Potomac Terraces. Staffs finds that Option A follows a very limited approach and misses the opportunity that this site offers as a gathering space for bicyclists and pedestrians. Staff supports Option B's addition of the Mile Marker 0 Platform and relocated boat storage which significantly improves the quality of open

space around this gateway location and increases the site's tree canopy. Staff supports Option B's provision of a more attractive gathering places with views to Roosevelt Island and the Kennedy Center. Staff also supports providing terraces to engage the water's edge. However, staff questions the success of the Tide Lock Nets and suggests the applicant further consider this element.

**K Street Bridge:** NCPC staff supports Option B's addition of the K Street bridge which provides a pedestrian and bicycle trail connection between the Capital Crescent Trail and Rock Creek Park Trail separated from vehicle traffic. Staff appreciates the 100-year flood line notation which shows that the surface of the bridge would not be impacted by this flood. We recommend that the applicant consider the C&O Canal Potomac River Flood Response Plan. We also recommend that the applicant continue to coordinate the proposed bridge and trail connection with DDOT's planned bicycle lanes on Water and K Streets, NW. Staff encourages the applicant to work with adjacent landowners to ensure private lands (behind 2900 K Street, NW and the Swedish Embassy) are publicly accessible to trail users. Staff recommends the applicant to consider lighting levels that increase safety and visibility, particularly under K Street, NW, the Whitehurst Freeway, and other bridges, while respecting Rock Creek Park's historic character.

## **2) The Rock Creek Confluence**

NCPC staff supports improving this undercelebrated trail gateway and providing a publicly accessible trail connection that could create continuous connections on both sides of Rock Creek. Staff notes this area joins the Georgetown Level of the canal with Rock Creek. Staff notes that contributing resources here include the Rock Creek Basin, the Canal Prism, the Towpath, Lock 1, Boat Basin 1, and the 29<sup>th</sup> Street Bridge.

Overall, staff finds that this area can support minimal change, as shown in option A, and has more potential to impact historic character. Staff notes that Option A (the only option presented) provides a connection to privately owned land occupied by the West Heating Plant. Staff supports this connection, which is distanced from the traffic and noise along Rock Creek and Potomac Parkway. Staff encourages the applicant to work with the West Heating Plant landowner to ensure private lands are publicly accessible to trail users. Staff also recommends that the applicant evaluate how the Confluence Bridge would be impacted by flood events and consider the C&O Canal Potomac River Flood Response Plan.

## **3) The Locks**

NCPC staff supports efforts to improve the visitor experience and interpretation and education spaces in and around the C&O Canal Georgetown Visitor Center. Staff understands that the current Visitor Center does not meet NPS's current space and program needs. Staff notes that recently, Locks 3 and 4 and the surrounding plaza area adjacent to the Visitor Center were restored. Staff notes that contributing resources here include the Towpath, Lock 3, Boat Basin 2, Boat Basin 3, 30<sup>th</sup> Street Bridge, Thomas Jefferson Street Bridge, Lock 4, and the Retaining Walls (mile 0.51 to 0.61) and (mile 0.67 to 1.07).

Overall, staff finds that this area can support more significant change, as shown in Option B, to meet NPS Visitor and Education Center space and program needs. NCPC staff supports keeping

---

mule staging closer to its historical location, while locating the Visitor and Education Center in an easily accessible and visible area, as shown in Option B. Staff suggests that Option B's new visitor and education center may attract more visitor foot traffic from M Street and that the Mule Yard would create an enjoyable processional to the canal and boat queuing area. Staff also supports enhancing adjacent plaza areas to accommodate groups of people standing or sitting.

#### **4) The Wisconsin Avenue Cutout**

NCPC staff recognizes the challenges posed by the narrow dimensions in this section of the canal, large grade separation between Wisconsin Avenue NW and the canal towpath, and the lack of any towpath on the southern canal edge in this area. Staff notes that the Georgetown Park Plan by Lockman Associates/Architects guided improvements to the Wisconsin Avenue Plaza, constructed in the 1980s. Staff notes that contributing resources here include the Towpath, the Canal Prism, the Water Intake, High Street Bridge (Wisconsin Avenue Bridge), Commemorative Obelisk (including its location), the Retaining Walls (mile 0.51 to 0.61) and (mile 0.67 to 1.07).

Overall, staff finds that this area can support minimal change, as shown in Option A, and has more potential to impact historic character. Regarding circulation, staff finds that Option B's introduction of boardwalk and boat dock elements on the canal's southern edge within this zone are likely problematic and are only acceptable if they are temporary and removable so that these interventions minimize impacts to the historic character of the canal prism and building and retaining walls. However, these boardwalk interventions must be balanced with changes to the towpath to protect the canal's openness.

Regarding elevators, staff questions Option A's placement of the highly visible elevator adjacent to Wisconsin Avenue, which also relocates the Commemorative Obelisk which as historic integrity of location. Staff prefers the more recessed elevator location in Option B but encourages the applicant to explore other elevator placement solutions. Staff generally encourages locating the proposed elevators in less visually prominent locations, incorporating elevators in a manner compatible with historic features, or screening elevators behind vegetation. Staff recommends the applicant consider security implications, maintenance requirements, and visual impacts of the proposed elevators.

Regarding the Cutout, Stone Archway, and Seating Steps, staff requests that the applicant confirm whether the retaining walls impacted by the Wisconsin Avenue Cutout are contributing features to historic resources and evaluate the need for additional seating space in this location. Staff appreciates the simple linear stairway configuration of Option A, versus the compressed stairway configuration proposed in Option B. NCPC staff finds that the addition of the seating steps beneath the arcade may be an unwelcoming and unpleasantly shady space for pedestrians to linger in a space that is hidden without clear lines of sight. Staff also recommends that the applicant consider alternatives to the current configuration of the Stone Archway and Seating Steps, including eliminating the Seating Steps while providing ample circulation area for elevator and stair egress at the towpath level.

## 5) The Market Plazas

In general, NCPC staff supports efforts to improve the *Market Plazas* and gathering spaces when they help interpret the canal, educate visitors, and connect people to the canal waterway while minimizing impacts to historic resources. Staff notes that this area is a spatially constrained section of the canal, tightly framed by buildings three to eight stories tall. The Market House Plaza to the north and the Fish Market Square to the south provide open plaza areas for gatherings and activities. Staff notes that the Georgetown Park Plan by Lockman Associates/Architects guided changes for the Market Plazas. Architect Peter Vercelli transformed the Fish Market Square into an open park plaza in the 1980s. Staff notes that contributing resources here include the Towpath, the Canal Prism, the Potomac Street Bridge, the Water Intake Ruins, and the Retaining Walls (mile 0.51 to 0.61) and (mile 0.67 to 1.07).

Regarding access to the towpath in this area, staff supports the location for the proposed elevator at the Market House Plaza adjacent to the Georgetown Park building turret.

In general, staff finds that Options A and B for the Market Plazas have strengths and weaknesses:

Option A protects the historic character and the spatial composition of the north wall framing the canal, provides a shaded elevated viewing and sitting area, and maintains more level plaza area for outdoor programming and events. However, it does not provide a strong north-south visual and spatial connection between the north and south plazas.

Option B provides a north-south visual and spatial connection between the two plazas as well as additional informal terraced seating arrangements for pedestrians with a strong visual connection to the canal waterway. However, it has more potential to impact historic character particularly the north retaining wall framing the canal. Option B also impacts circulation and service routes on Potomac Street NW which provides access to adjacent buildings and businesses.

Staff suggests that the applicant document the feasibility of constructing Option B's terrace seating steps including reconfigurations for the Georgetown Market House, impacts to buildings and businesses, and regrading along Potomac Street NW, confirm whether Option B's terrace seating impacts the historic integrity of the north retaining walls, evaluate the need for additional seating space, and study the dimensions for this steep vertical terrace connection.

Staff suggests that the Commission request additional documentation for Options A and B to help determine a preferred approach, including information on how visitors will use and experience the north and south plaza spaces, and visualizations for Options A and B.

In addition, staff finds that the Fish Market Square is an intimate space framed by existing buildings and shaded with canopy trees. Therefore, the addition of the Fish Market Canopy, as shown in Option B, may overwhelm this intimate space and diminish tree canopy. Staff recommends using temporary removable canopies for events and activities when needed.

---

## 6) The Stone Yard

Staff notes that this area has a wide towpath and adjacent vegetated open space south of the canal prism (riverside). Staff notes that contributing resources here include the Towpath, the Canal Prism, Frederick Street Bridge (34<sup>th</sup> Street Bridge), Dual Water Intake, and the Retaining Walls (mile 0.51 to 0.61) and (mile 0.67 to 1.07).

Overall, staff finds that this area can support minimal change, as shown in Option A, and has more potential to impact historic character. NCPC staff recognizes that the proposed kayak kiosks and boat launch areas for Options A and B of the *Aqueduct* and the *Stone Yard* areas are related. Staff suggests that the applicant avoid overburdening the canal with watercraft (having both the interpretive mule-drawn boat and kayaks in the same location). Staff suggests that the Commission recommend the applicant consider relocating the kayak boat launch from the *Sone Yard* to the *Aqueduct* area to avoid potential conflicts between the floating dock and its associated recreational programming and the interpretive mule-drawn boat circulation.

NCPC staff supports incorporating additional seating without impacting building entries, as shown in Options A and B. Staff suggests that Option B's larger dock may project too far into the canal prism.

## 7) The Aqueduct

Staff notes that this area begins a transition from the canal's urban condition on the east to a more naturalized condition on the west, more typical of the majority of the C&O Canal. In addition, the Alexandria Aqueduct is a structure in ruin that affords excellent views of the Potomac River. Staff notes that contributing resources here include the Towpath, the Canal Prism, the Alexandria Aqueduct Abutments, the Washington Canoe Club, and the Retaining Walls (mile 0.51 to 0.61) and (mile 0.67 to 1.07).

Overall, staff finds that this area can support minimal change, as shown in Option A, and has more potential to impact historic character. Staff finds that Option A has fewer visual impacts. Staff discourages the proposed trestle structure in Option B because this is not an actual historic remnant of an earlier bridge structure and introduces an element that creates a problematic false sense of history.

Staff supports improving connections between the Capital Crescent Trail and C&O Canal Towpath, which are parallel but are at different elevations, and recommends coordination with the Georgetown Non-motorized Boathouse Zone Development Plan. Staff requests clarification on the proposed towpath ramps located on the east side of the Whitehurst Freeway Bridge, and whether this is needed for the interpretive mule-drawn boat turnaround.

---

---

## **Recommendation Summary**

Based on the previous analysis, staff finds that in order to balance universal (ABAAS-compliant) access and improved visitor experience with historic preservation, that a mixture of Options A and B are appropriate depending on location and context.

Regarding the towpath, the applicant should attempt to keep areas of the existing towpath intact and minimize changes to the existing and historical informal character. The applicant should consider designating one universally accessible (ABAAS-compliant) route; applying Option A where space is available to meet the minimum dimensions required and applying Option B in limited concealed areas where there is not enough available space to meet the minimum dimensions required. In general, staff suggests that the applicant avoid multiple changes or alterations to long segments of the existing canal towpath.

Regarding the interventions at seven locations, more significant changes, as show in Option B, are appropriate for the following locations:

- *Mile Marker 0*
- *The Locks*
- Possibly the *Market Plazas*

Minimal changes, as show in Option A, are appropriate for the following locations:

- *The Rock Creek Confluence*
- *The Wisconsin Avenue Cutout*
- Possibly the *Market Plazas*
- *The Stone Yard*
- *The Aqueduct*

In general, staff finds that Options A would have fewer impacts to the historic integrity and character of the C&O Canal National Historical Park while still meeting the project's goals and objectives. However, Options B would have more impacts to the historic integrity and character because of more substantial modifications, particularly to the north retaining wall as shown in the *Wisconsin Avenue Cutout's* Stone Archway and Seating Steps and the *Market Plaza's* Terrace Seating, and the introduction of new structures such as the *Market Plaza's* Open Air Canopy or *Aqueduct's* Trestle Pavilion.

---

## **CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE**

### **Comprehensive Plan for the National Capital**

As noted above, this project meets the basic goals of the Comprehensive Plan. In addition, it advances the *Capital Space Initiative*, a joint project between the National Park Service (NPS), the District of Columbia, and NCPC to enhance urban natural areas.

### **National Historic Preservation Act**

Both NPS and NCPC have an independent responsibility to satisfy the requirements of Section 106 of the National Historic Preservation Act (NHPA). The NPS held consulting parties meetings, including joint Section 106 and NEPA meetings, in June 14, 2017 for project scoping, and November 2, 2017 and April 4, 2019 for input on proposed alternatives. NPS initiated Section 106 consultations with the DC SHPO, VDHR, NCPC, and CFA in May 2017. A Consulting Parties Meeting was held on April, 11 2019, with additional preliminary briefings held on October, 10 2017 and March, 27 2019. In consultation with the DC SHPO and other consulting parties, NPS identified a draft area of potential affects (APE) and the historic properties located within the APE.

### **National Environmental Policy Act**

Both NPS and NCPC have an independent responsibility to satisfy the requirements of the National Environmental Policy Act (NEPA). NPS, with NCPC as a cooperating agency, is the lead federal agency responsible for compliance with the National Environmental Policy Act (NEPA). The NPS held public meetings, including joint Section 106 and NEPA meetings on June 14, 2017 for project scoping, and November 2, 2017 and April 4, 2019 for input on proposed alternatives.

## **CONSULTATION**

### **Coordinating Committee**

The Coordinating Committee reviewed the proposal at its May 15, 2019 meeting. Without objection, the Committee forwarded the proposed comments on concept plans to the Commission with the statement that the proposal has been coordinated with all participating agencies. The SHPO is coordinating subject to completion of Section 106 consultation, and shared comments provided to NPS. The participating agencies were NCPC; the National Park Service; the US General Services Administration; the Washington Metropolitan Area Transit Authority; the District of Columbia Office of Planning; the District Department of Transportation; and the District of Columbia State Historic Preservation Officer, and the District Department of Energy and Environment.

### **U.S. Commission of Fine Arts**

The CFA and the Old Georgetown Board will provide comments on this project during their June and July 2019 meetings.

### **ONLINE REFERENCE**

The following supporting documents for this project are available online at [www.ncpc.gov](http://www.ncpc.gov):

- Submission Package

Prepared by Meghan Spigle Dowker  
05/30/2019

### **POWERPOINT (ATTACHED)**

### **ADDITIONAL ATTACHMENTS**

- DC SHPO's Comment Letter
- Committee of 100's Comment letter, included at the request of Stephen Hansen, Chair

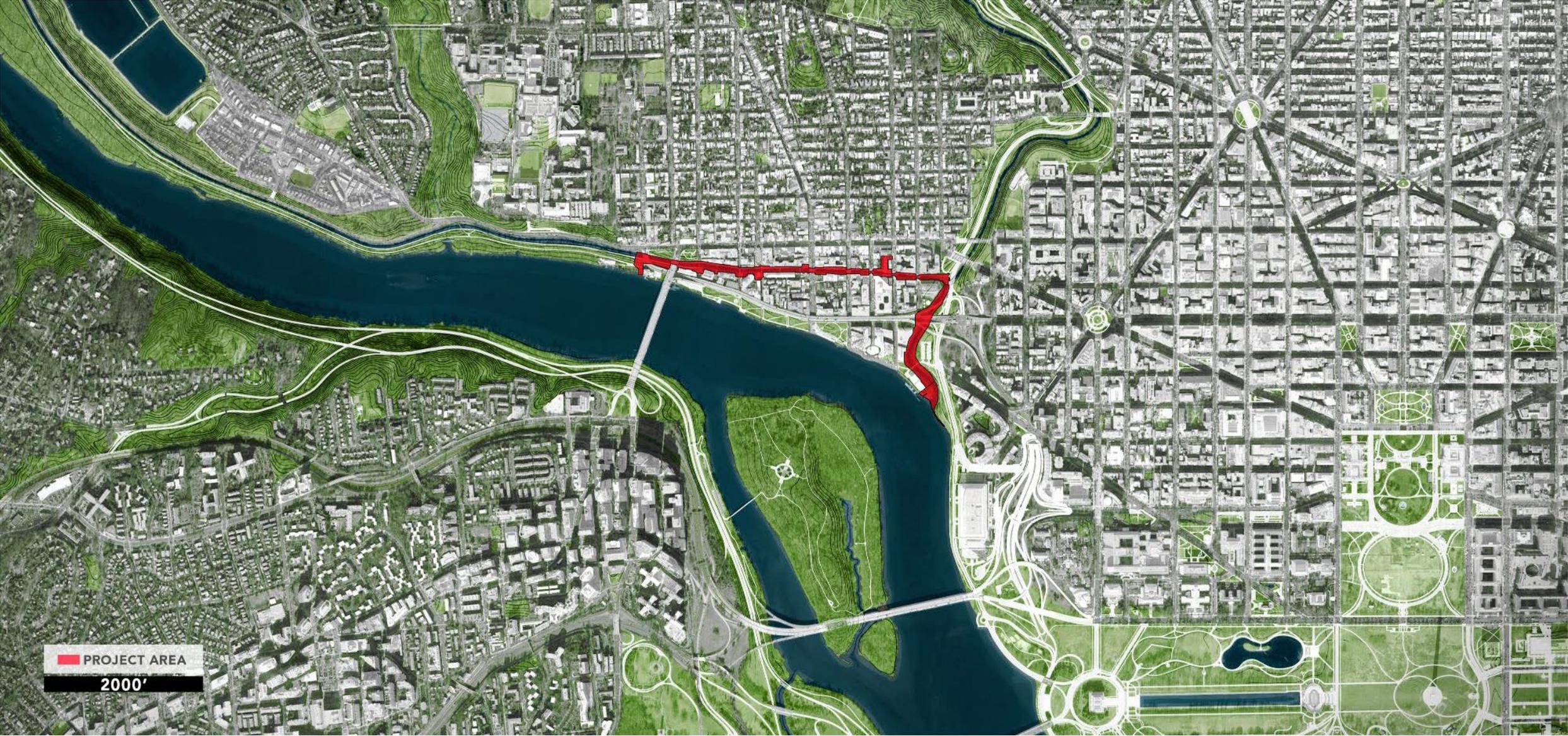
# Georgetown Canal Plan

Chesapeake & Ohio Canal, located between the zero-mile marker and Alexandria aqueduct,  
Washington, DC

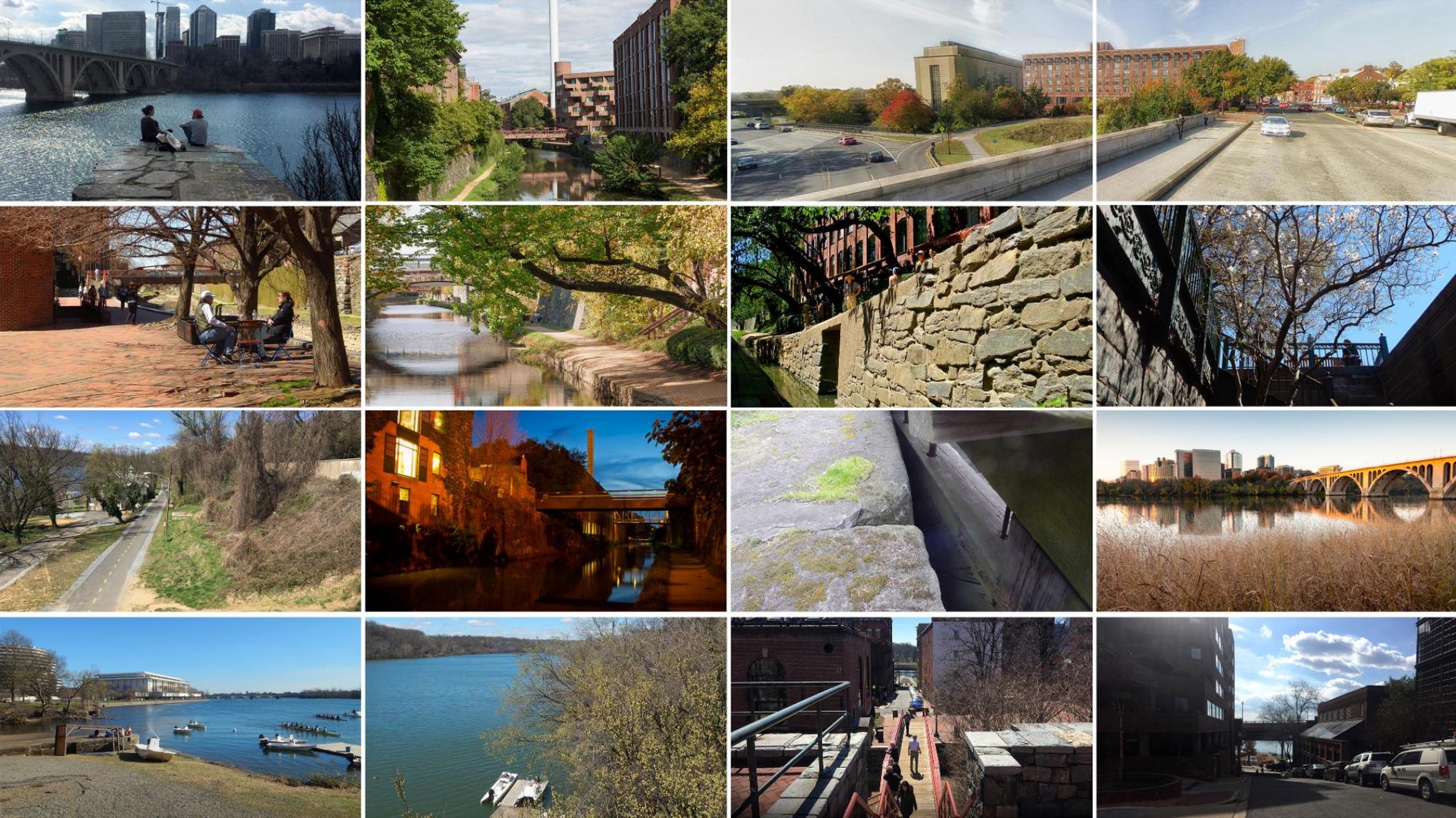
Approval of Comments on Concept Plans

United States Department of the Interior

# Project Location



# Existing Conditions



# Cultural Landscape Inventory



# Project Vision and Goals

*Enhance the Georgetown section of the Canal as a dynamic, urban national park that provides each person with a memorable and enriching experience.*

1. Respect, celebrate, and interpret **historic character, authenticity, and sense of place.**
2. **Rehabilitate and reveal** historic structures and cultural landscapes.
3. Improve **safety.**
4. Increase **accessibility** and **public access.**
5. Build and sustain the capacity of the Canal to **serve as a living classroom** and ensure **equitable access to education and interpretation.**
6. Incorporate an array of programming for **discovery, recreation, and reflection** to be enjoyed by **broad and diverse audiences.**
7. **Balance resource stewardship with creating unique experiences.**
8. Establish meaningful connections to, and enhance the **integration with the surrounding community.**
9. Provide **essential amenities** such as signage, gathering spaces, restrooms, trash and recycling bins, and drinking fountains.
10. Incorporate **sustainability, climate adaptation, and resilience.**
11. Ensure that the project is **financially sustainable and managed cooperatively, efficiently, and responsibly.**

# Comments on Alternatives

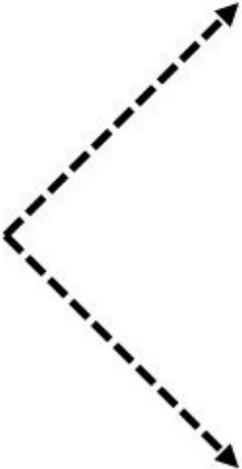
## 1. No Action Alternative



Immediate Repairs  
&  
Current Operations & Maintenance

## 2. Build Alternative

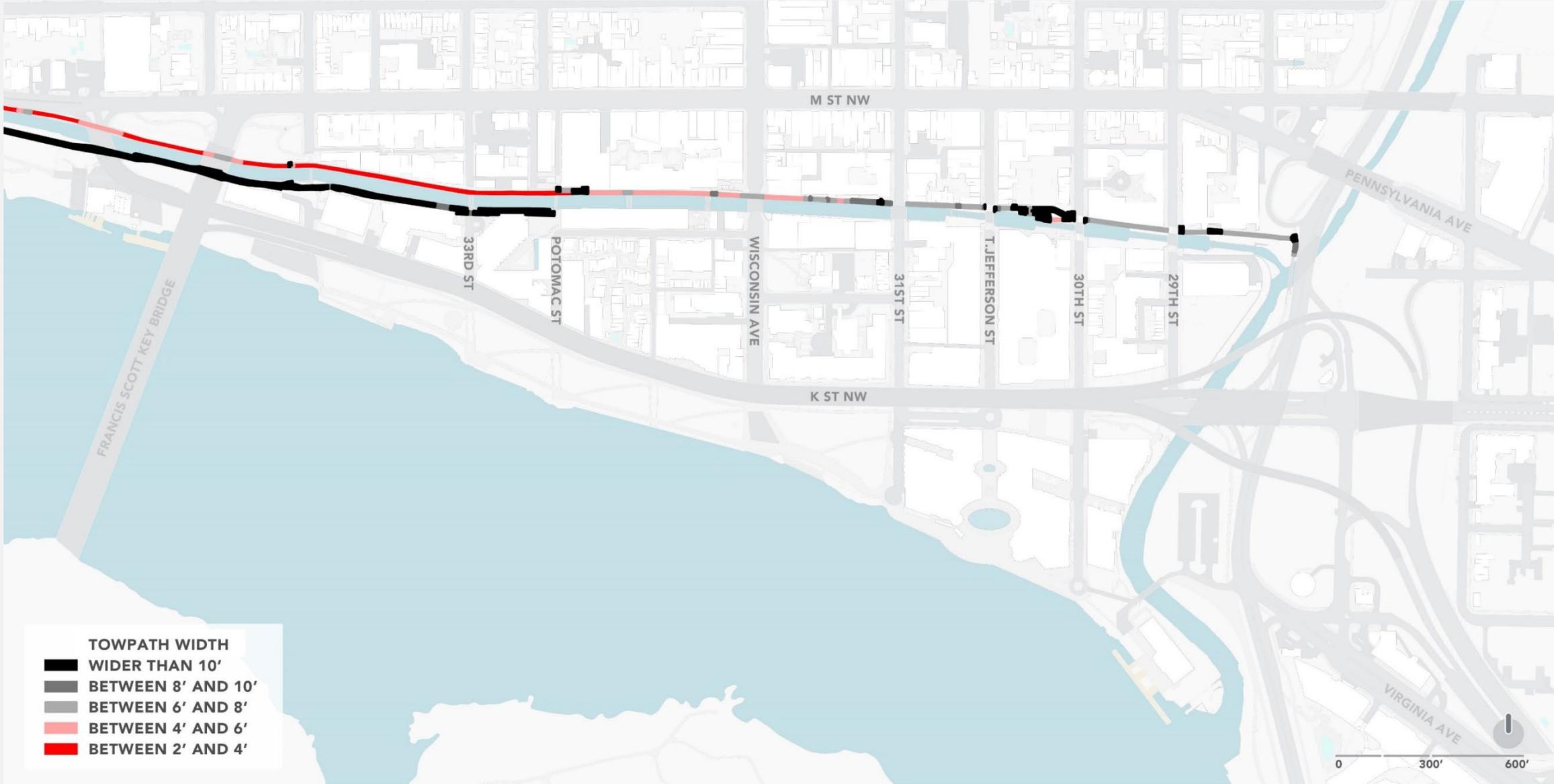
*Un-Lock the Potential*  
Base Repair & Rehabilitation  
(Common to All)



# Towpath



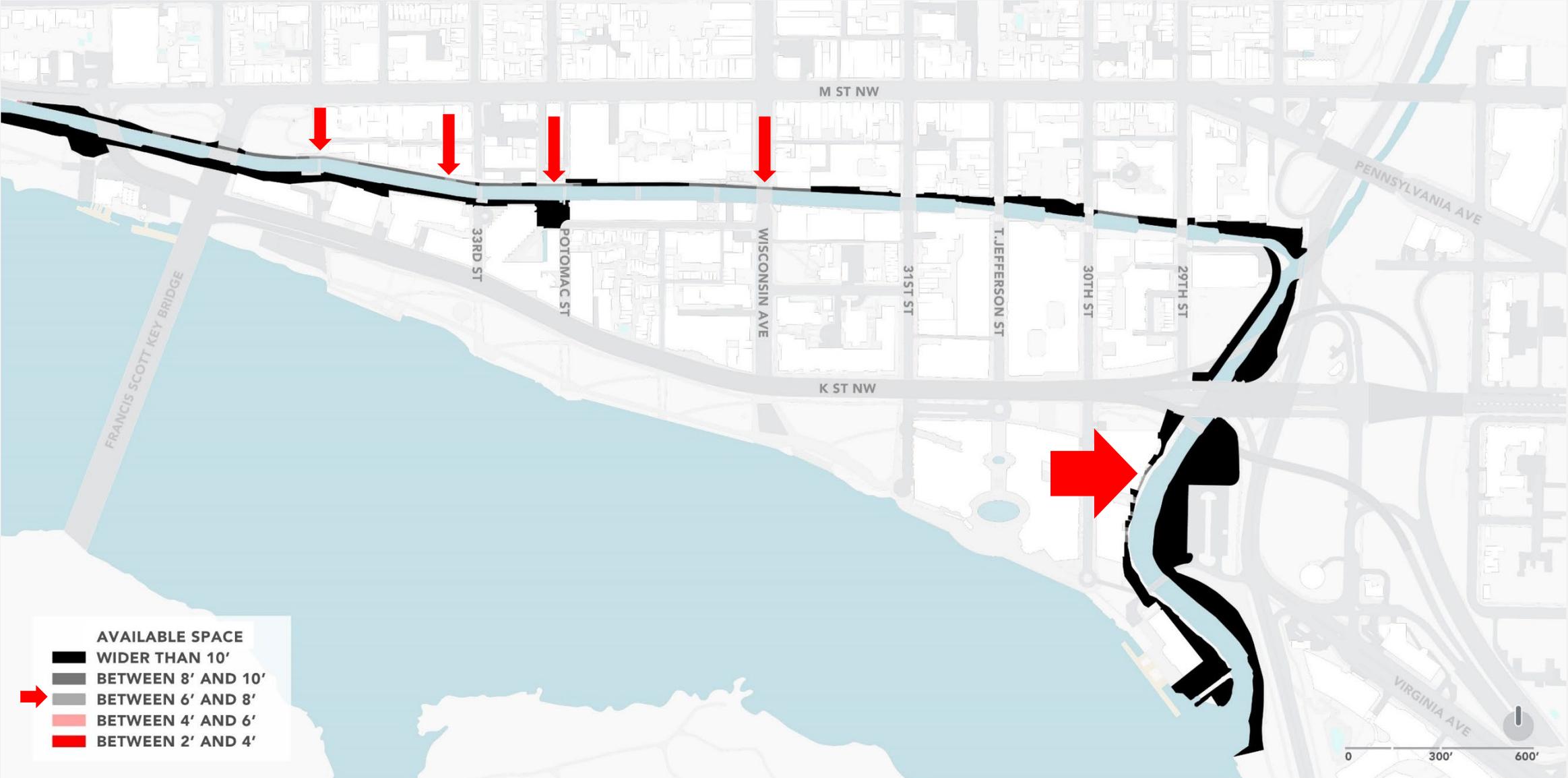
# Constraints – Current Width



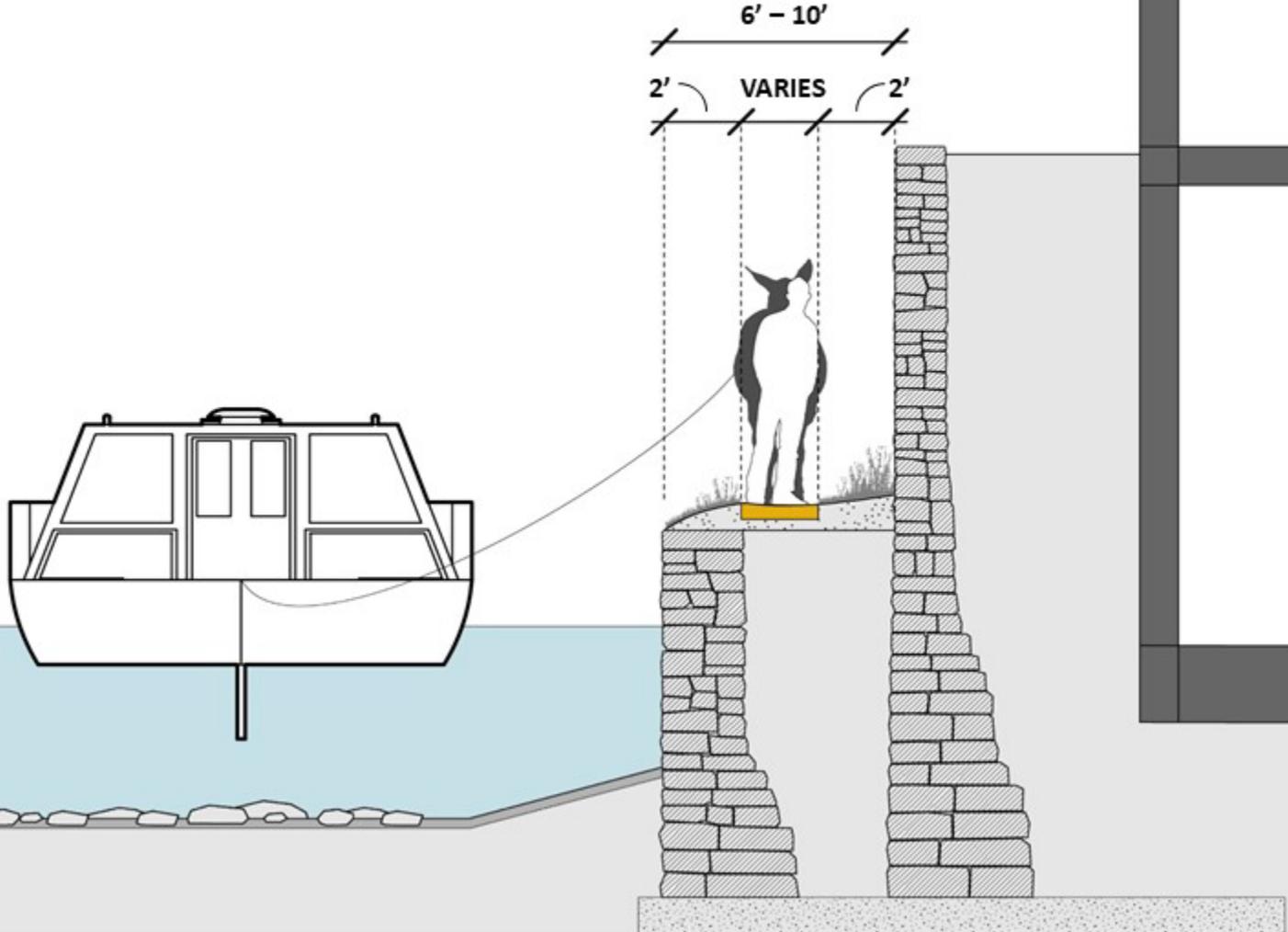
# Constraints – Current Available Space



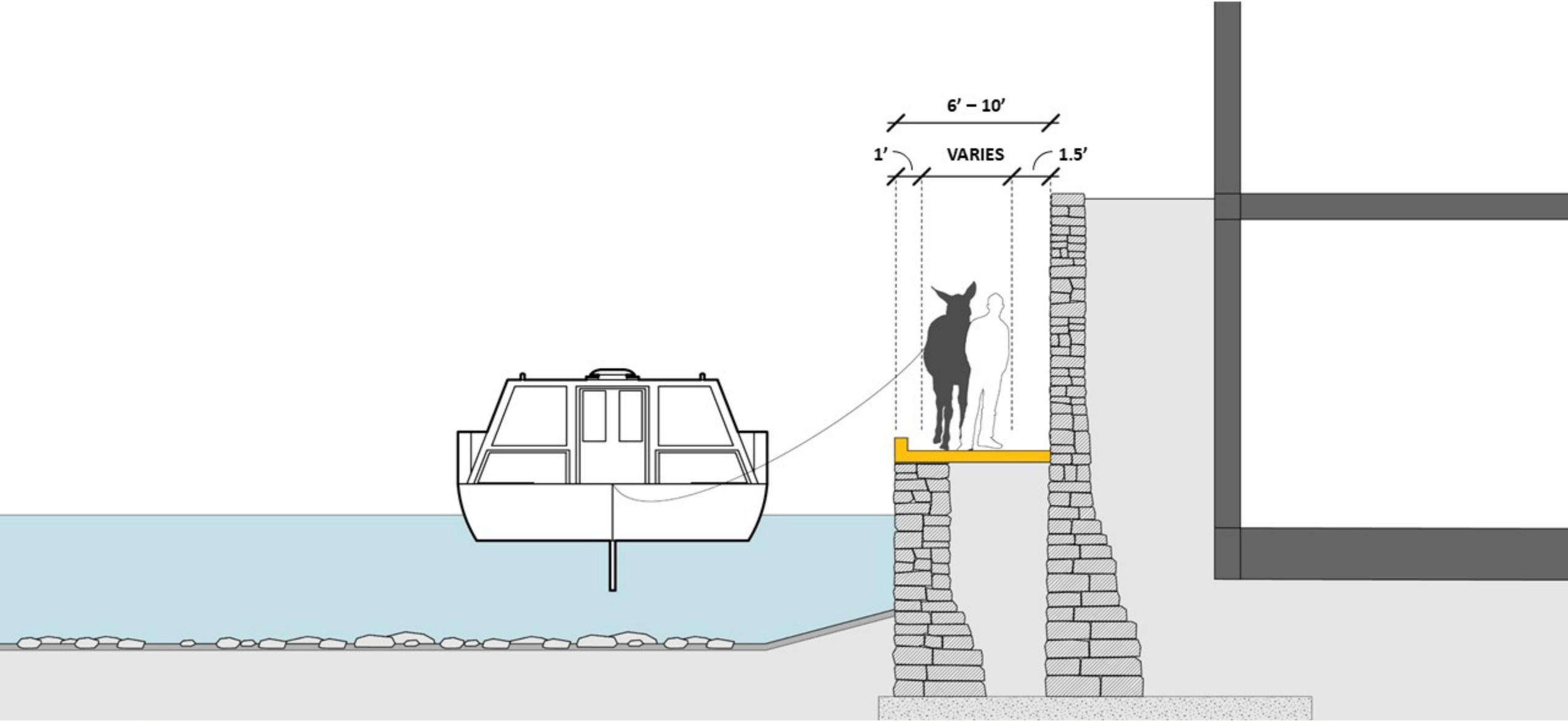
# Constraints – Current Pinch Points



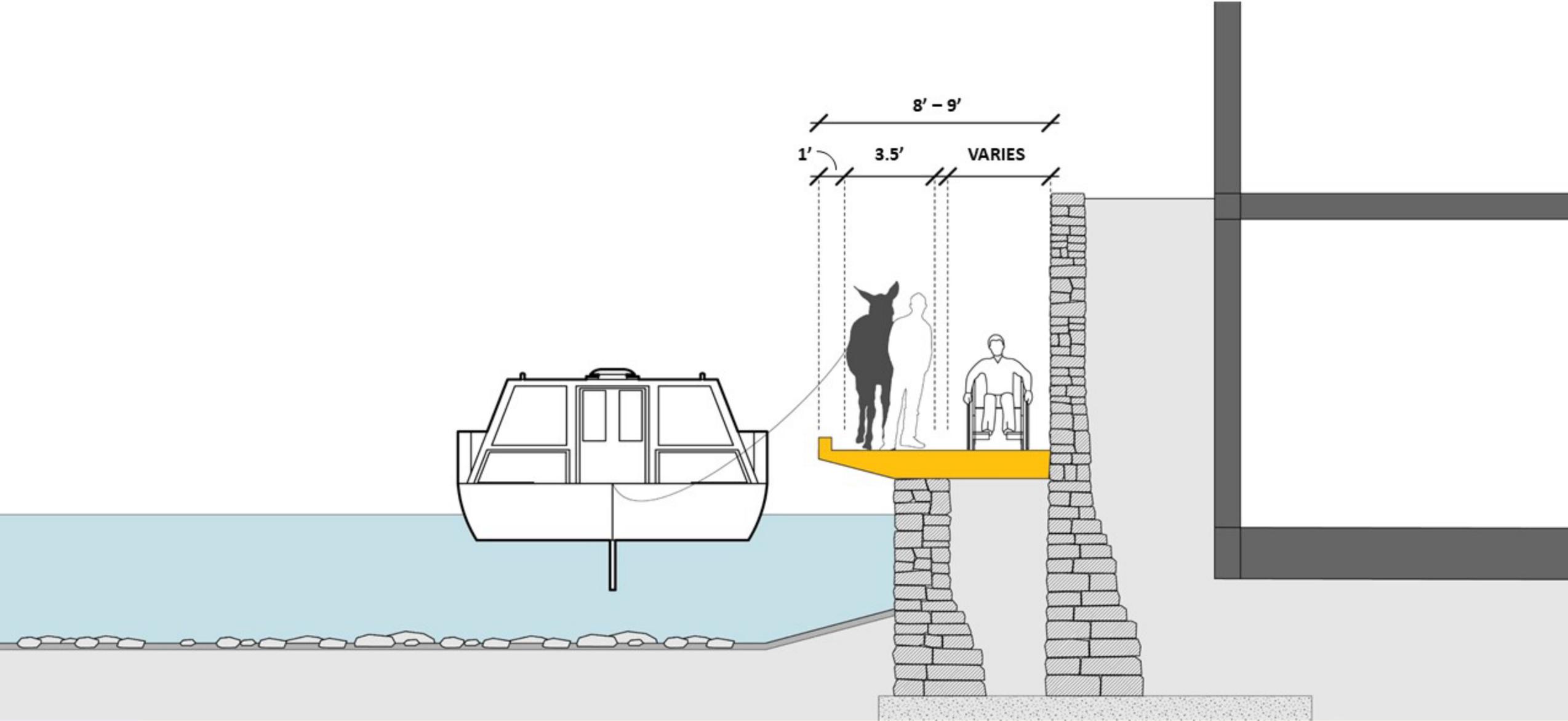
# Towpath - Current



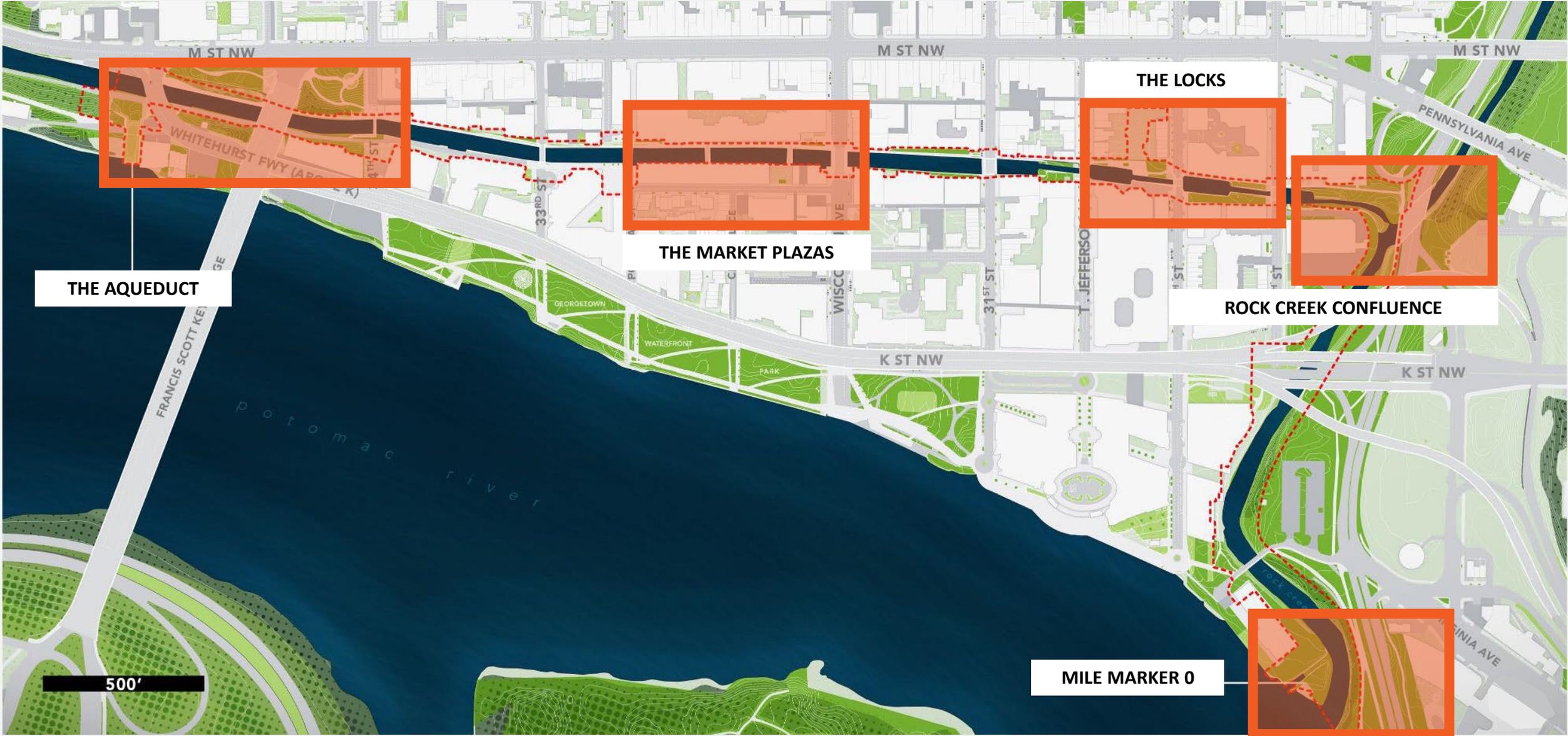
# Towpath – Option A



# Towpath – Option B



# Five Key Places



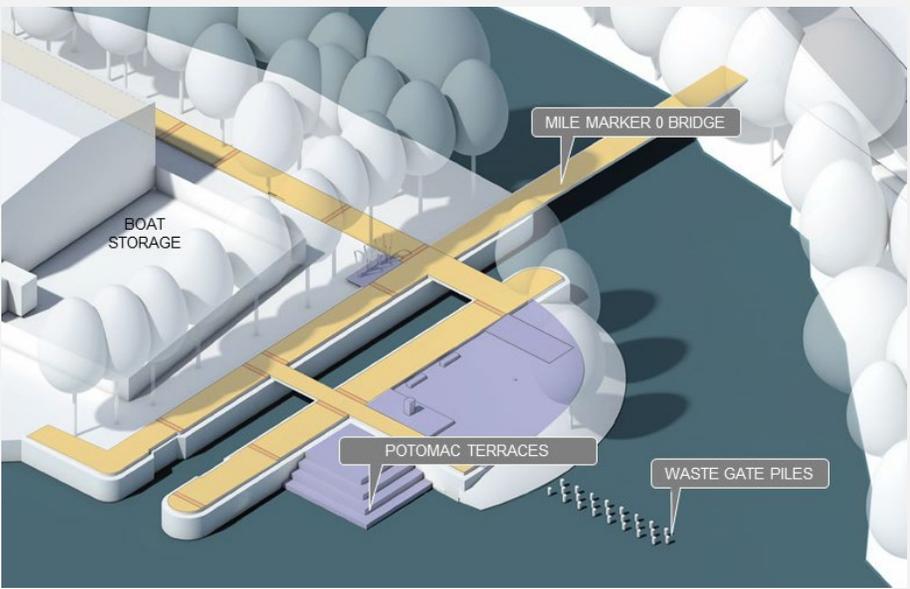
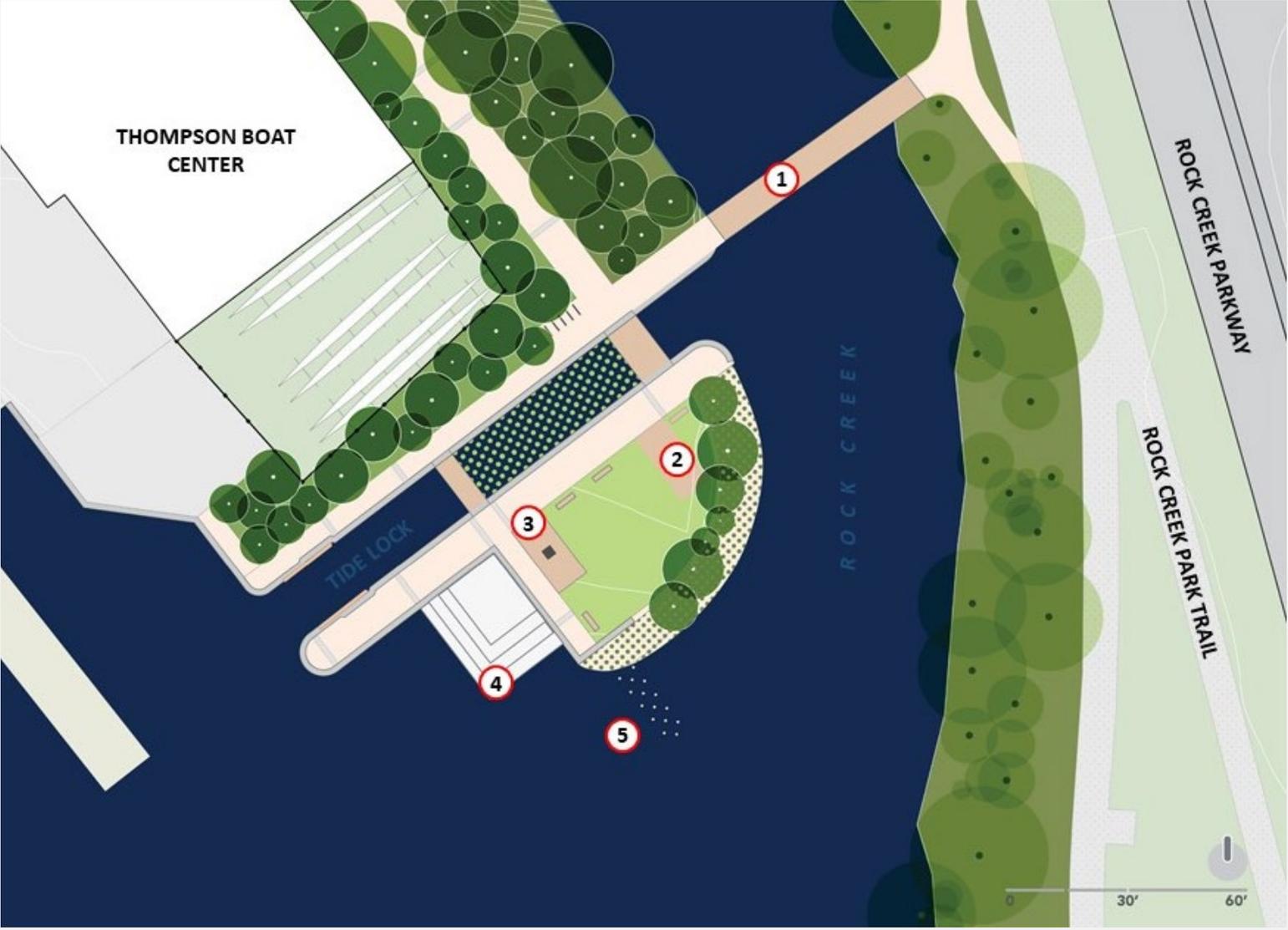
# Mile Marker 0



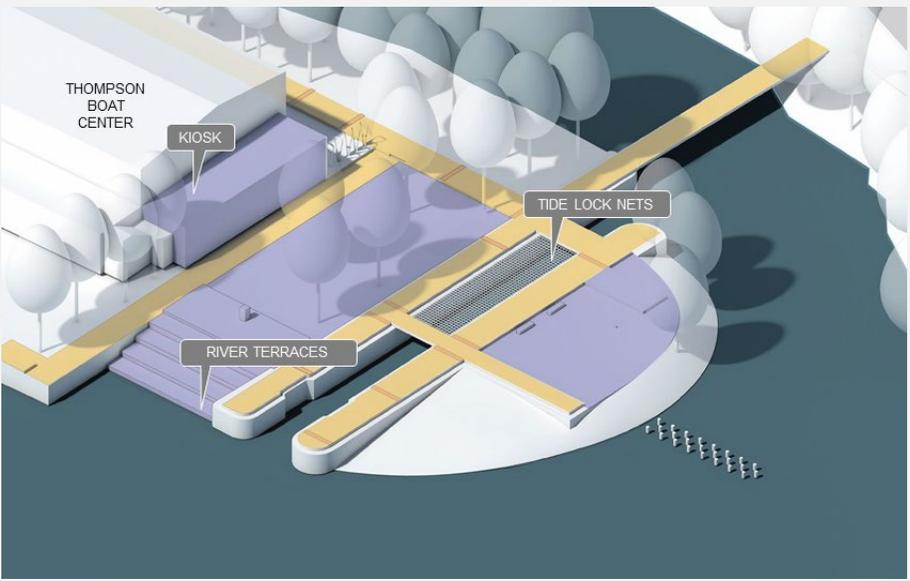
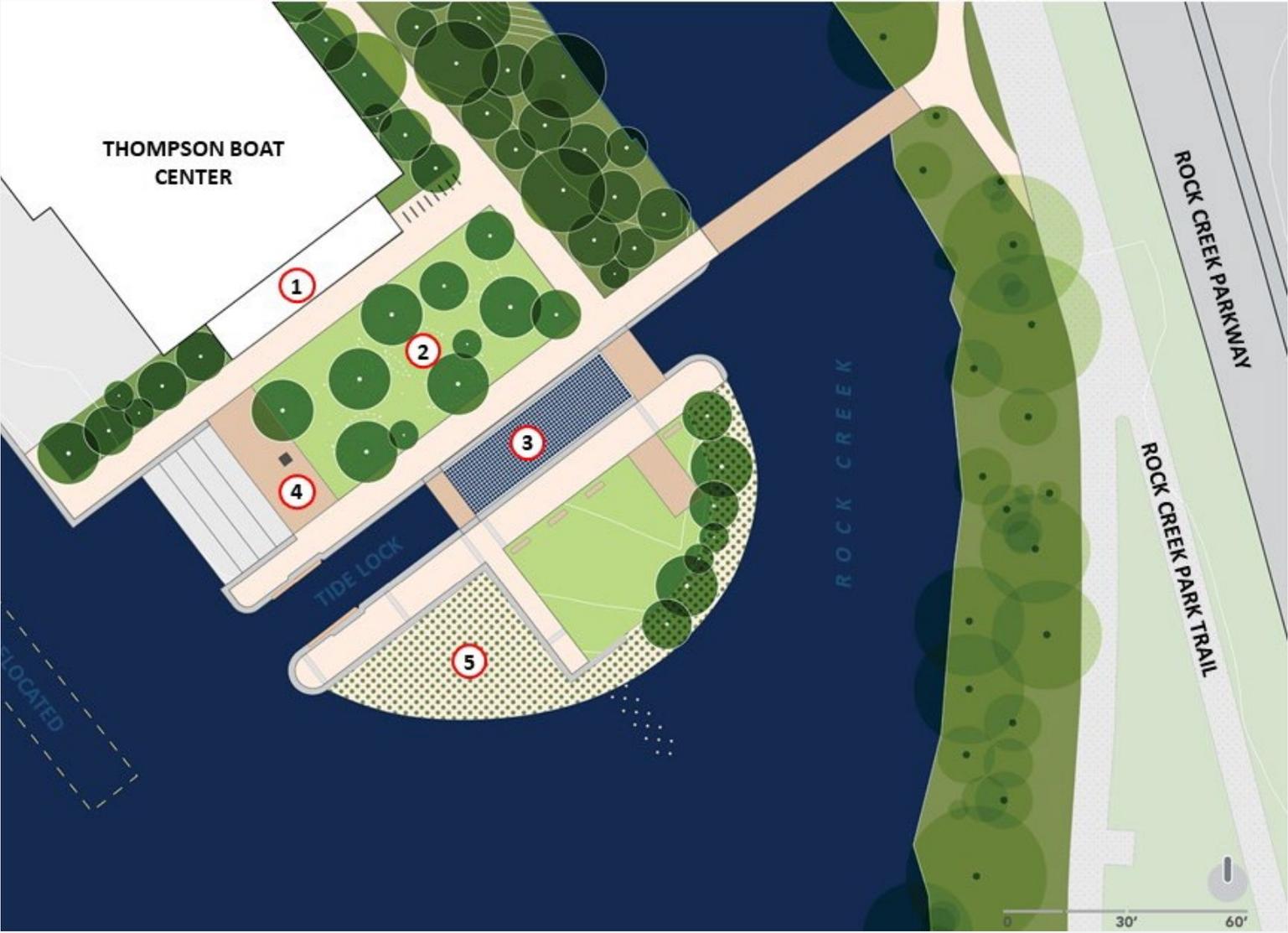
# Mile Marker 0 – Current Condition



# Mile Marker 0 – Option A



# Mile Marker 0 – Option B



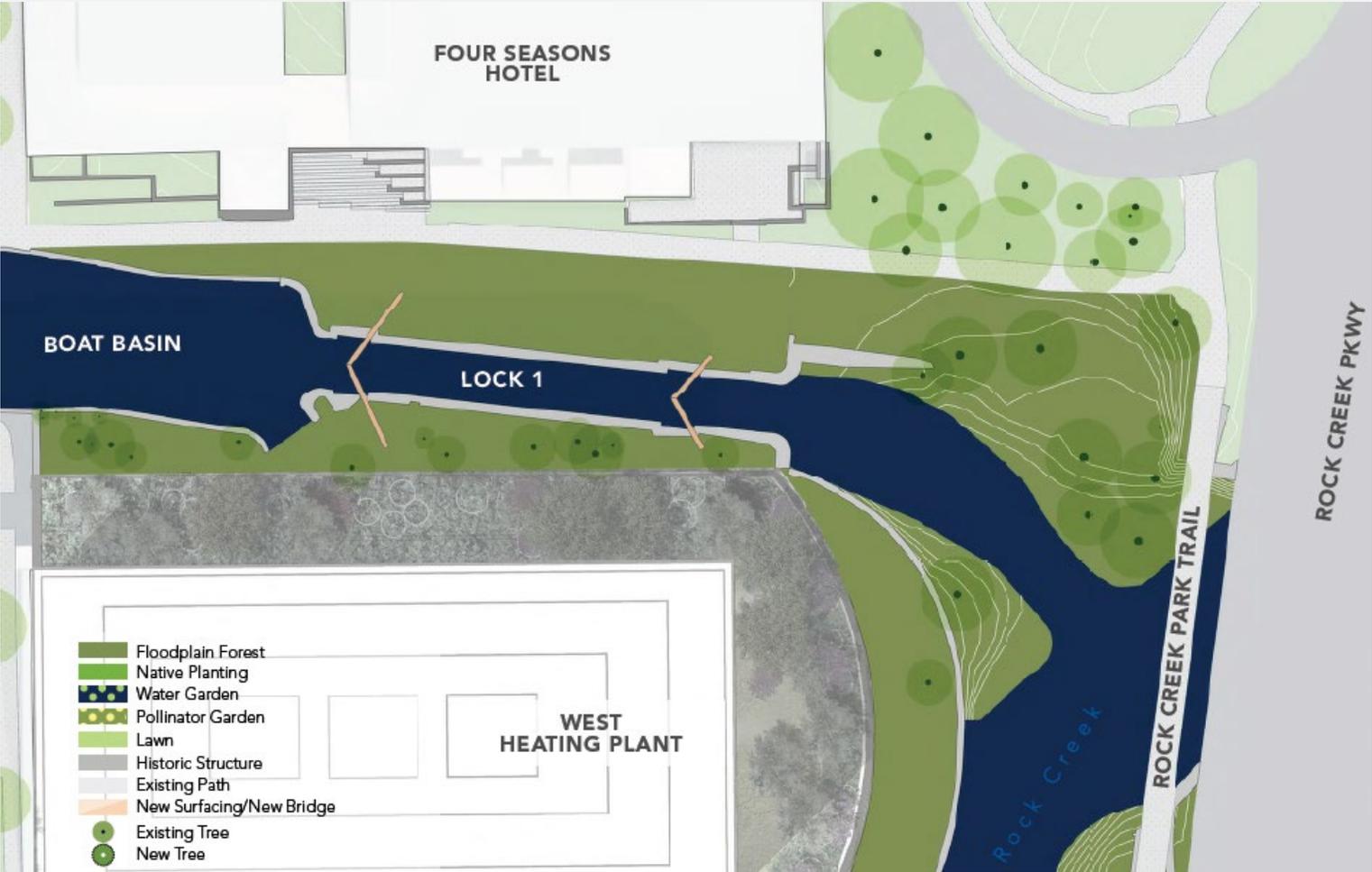
# Mile Marker 0 – K Street Bridge – Option B



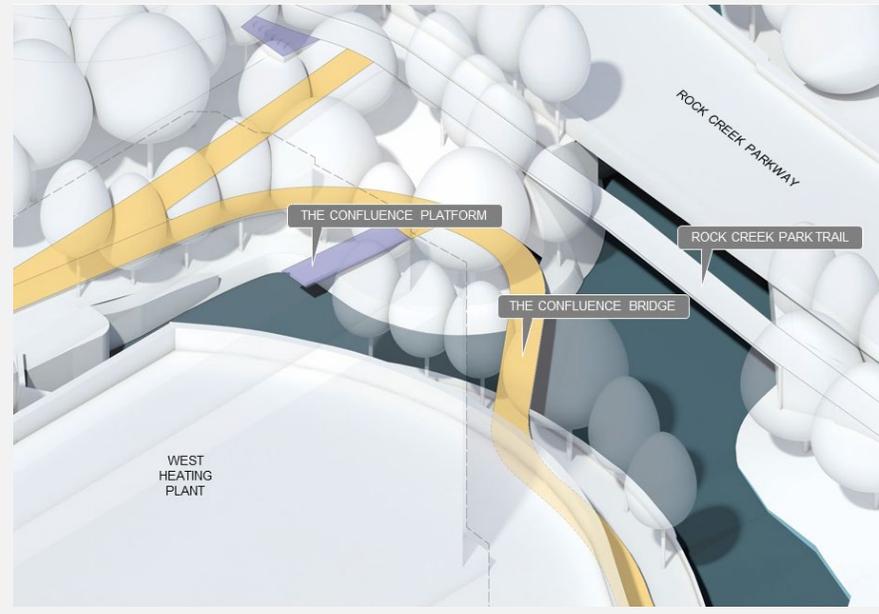
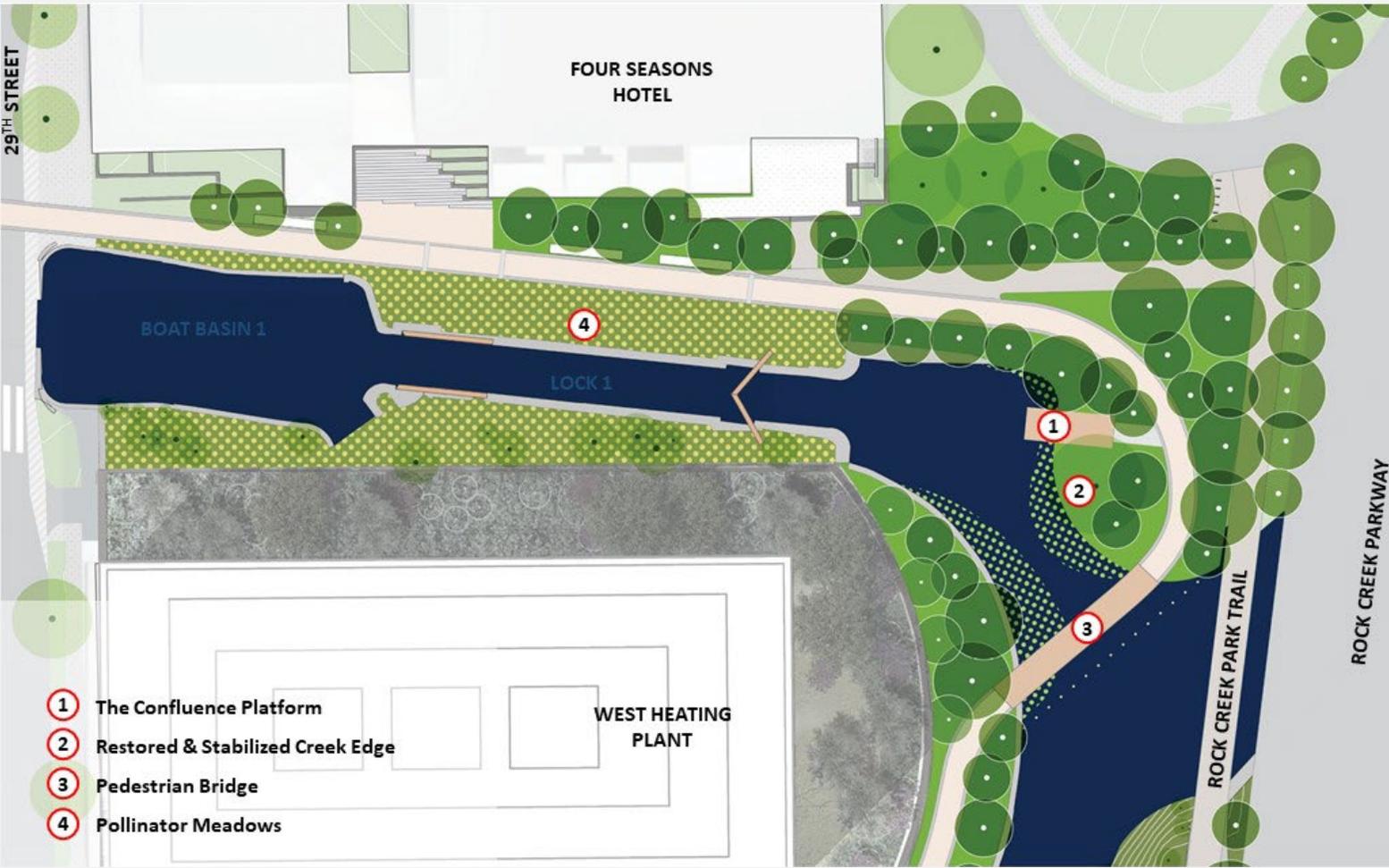
# Rock Creek Confluence



# Rock Creek Confluence— Current Condition



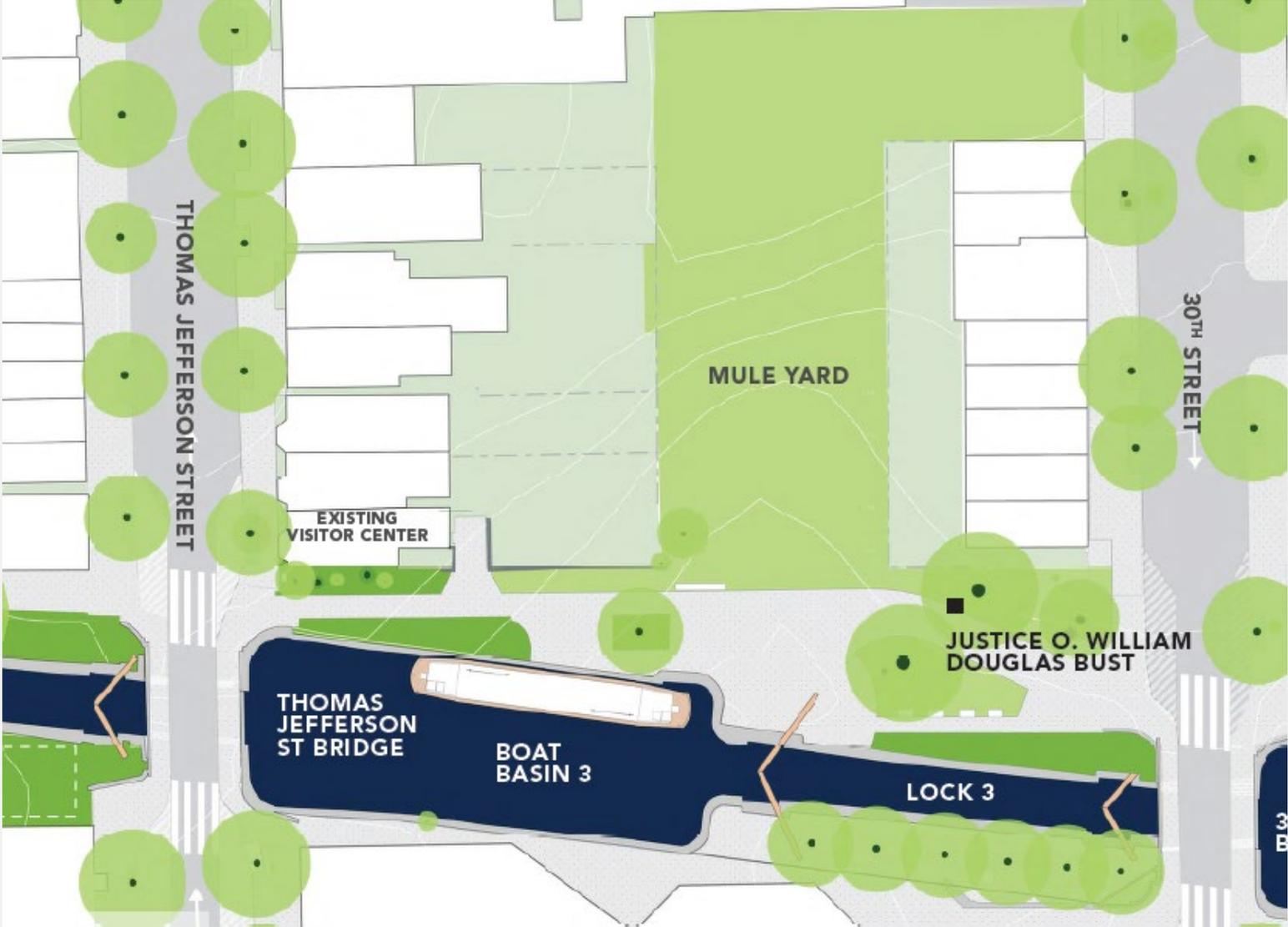
# Rock Creek Confluence – Option A



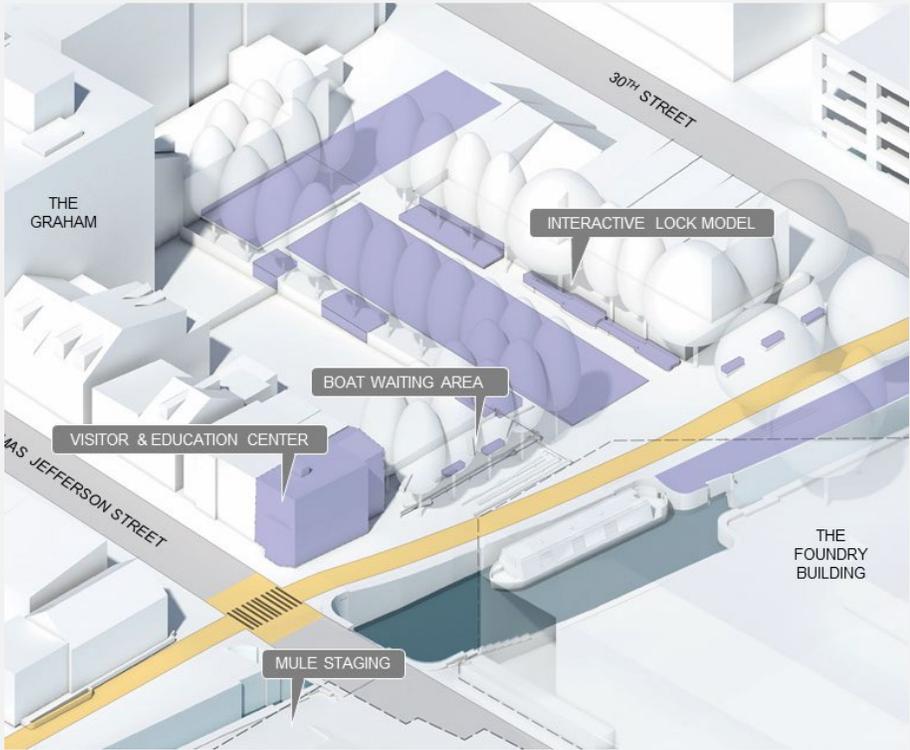
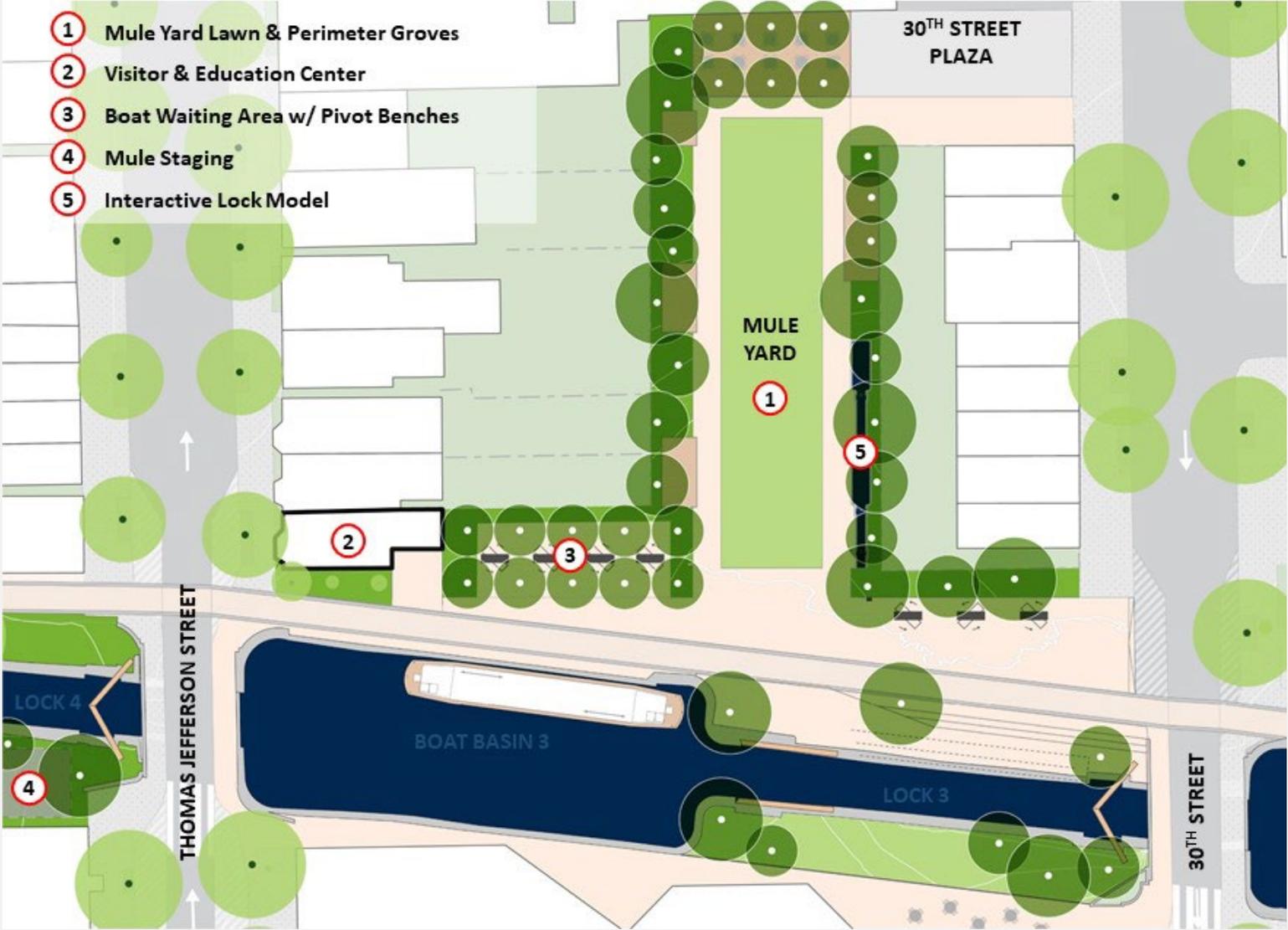
# The Locks



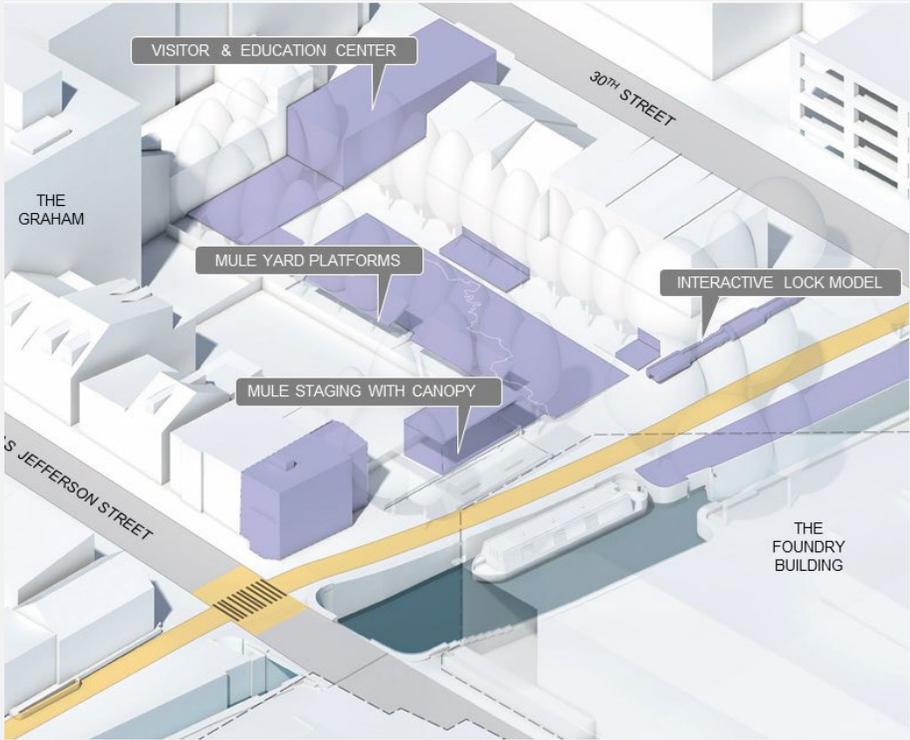
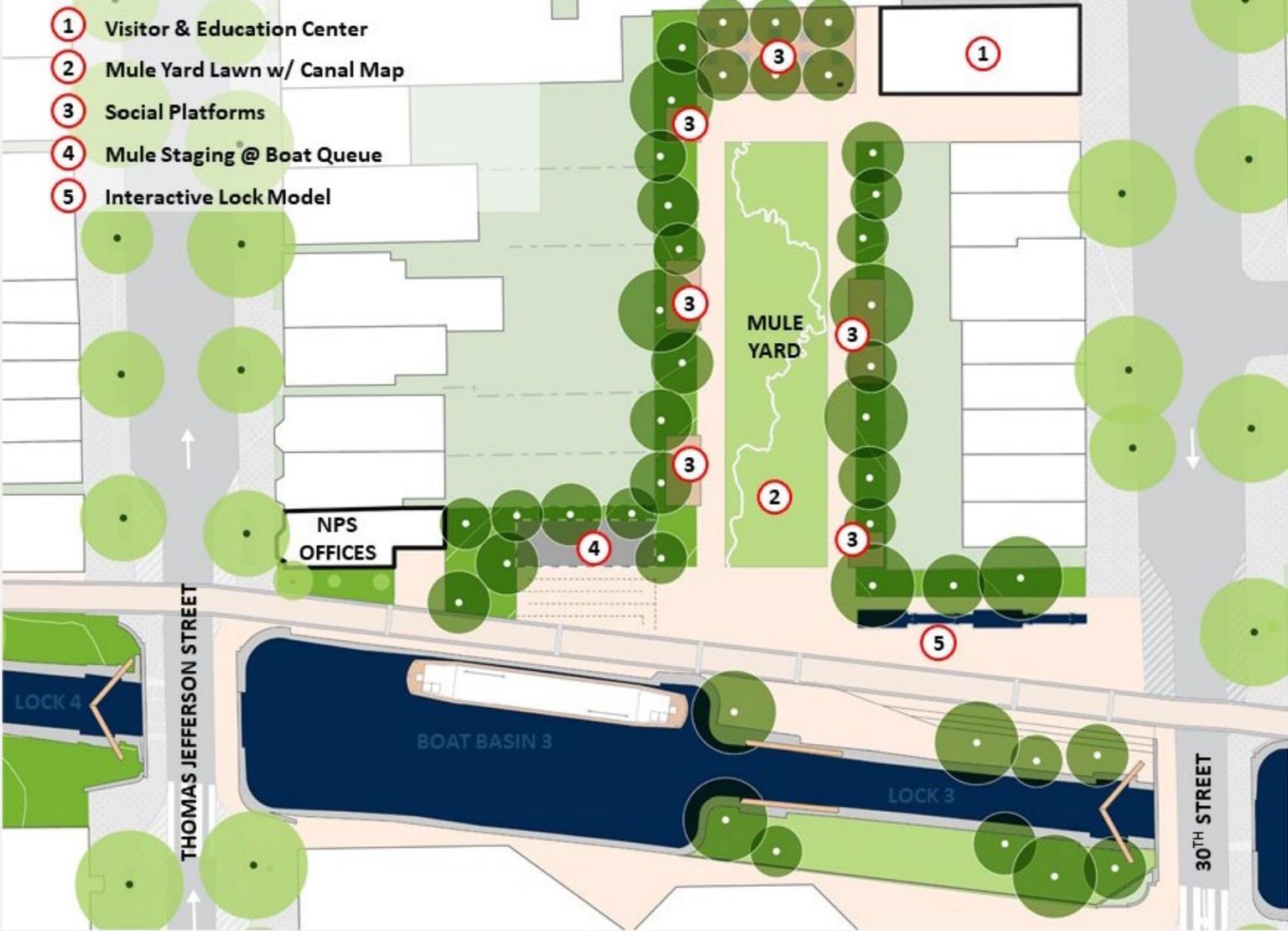
# The Locks – Current Condition



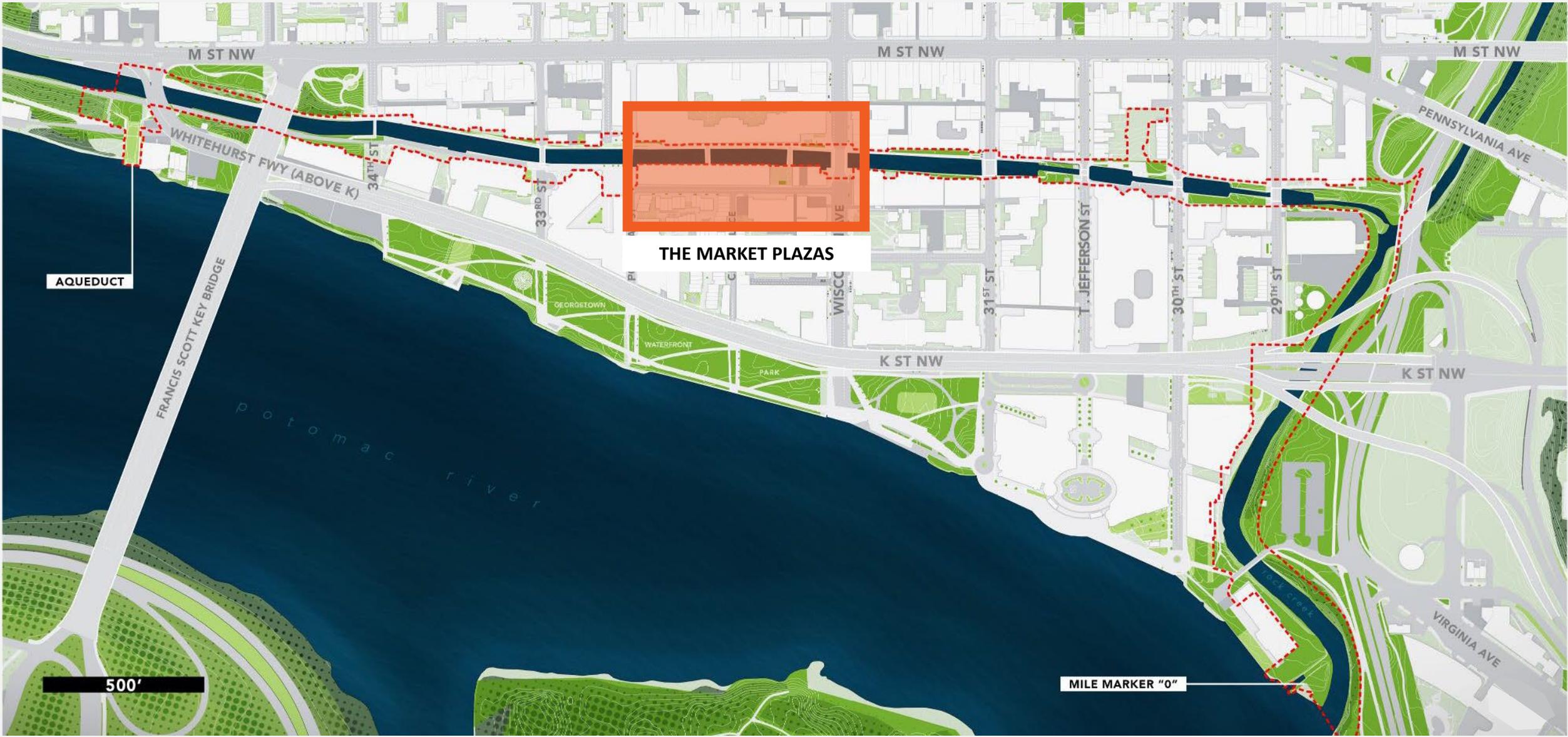
# The Locks – Option A



# The Locks – Option B



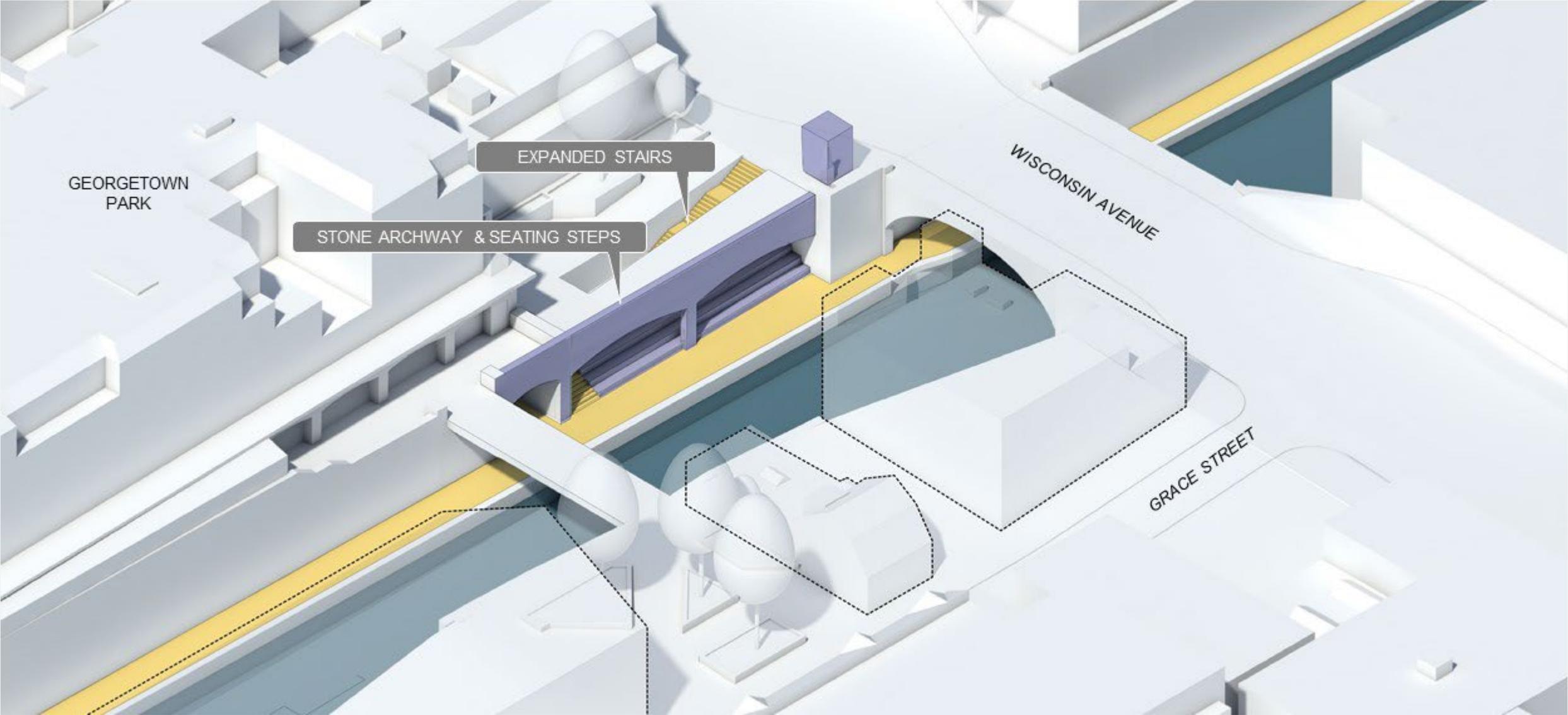
# The Market Plazas



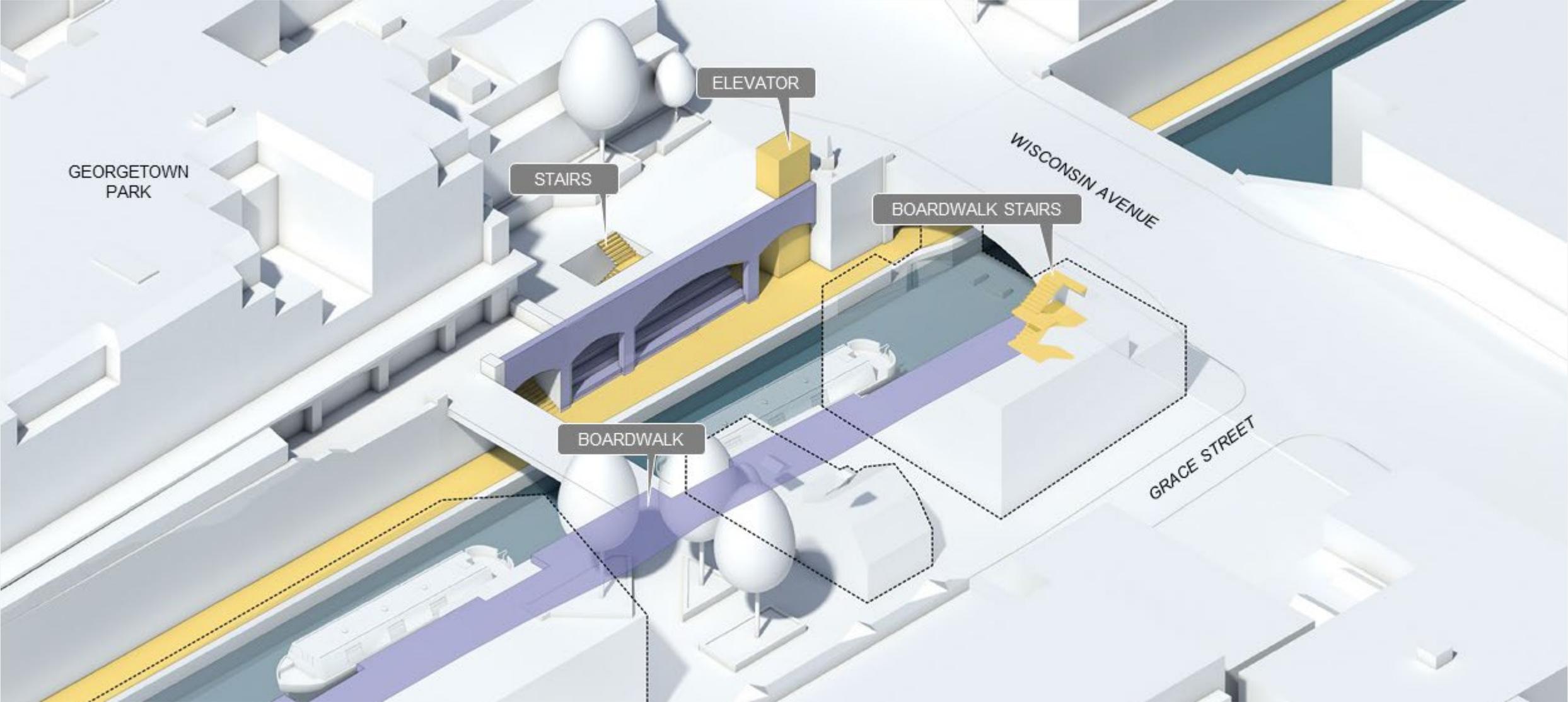
# The Market Plazas - Wisconsin Ave Cutout - Current



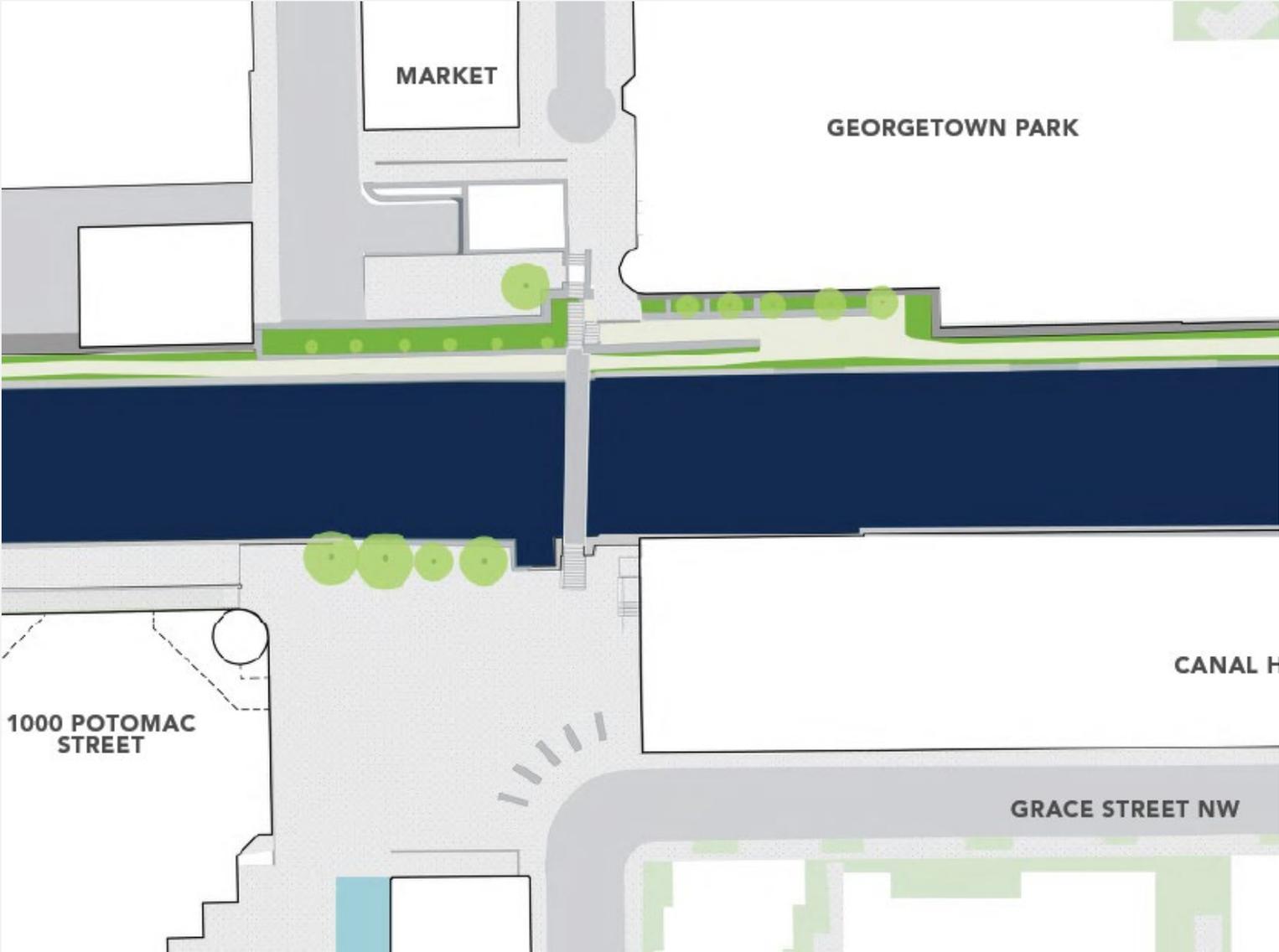
# The Market Plazas – Wisconsin Ave Cutout - Option A



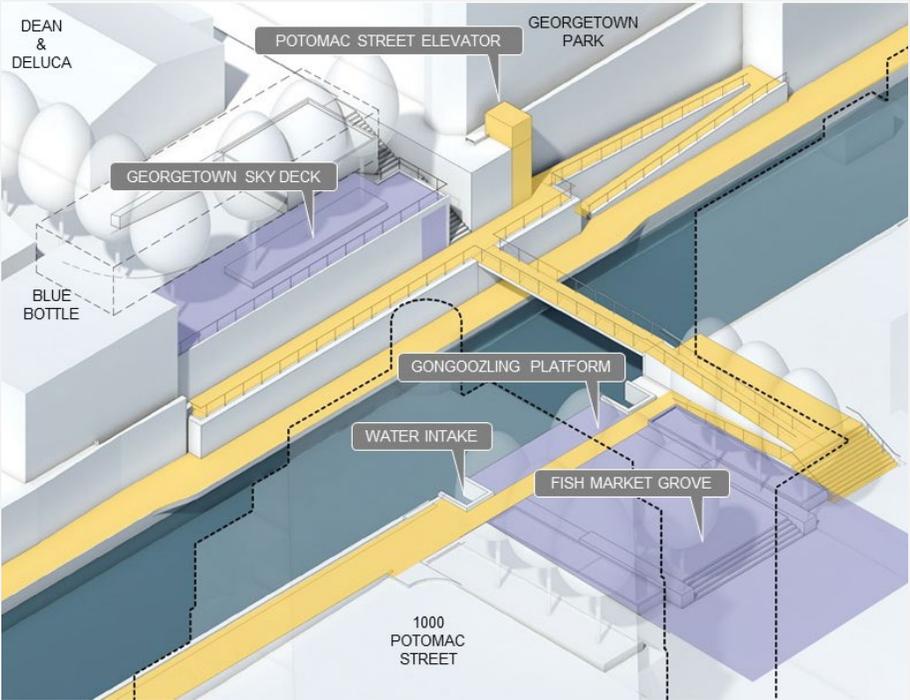
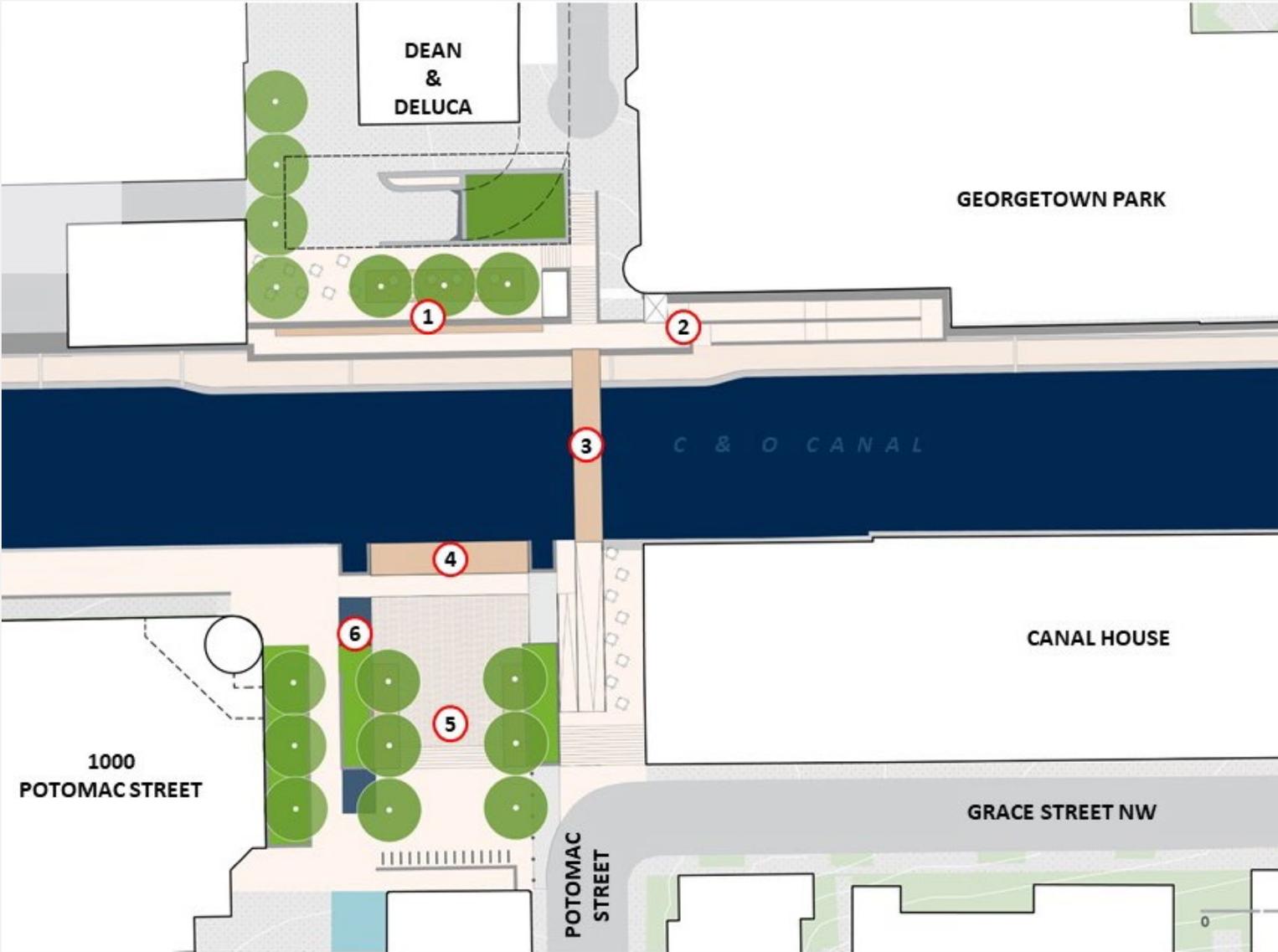
# The Market Plazas – Wisconsin Ave Cutout - Option B



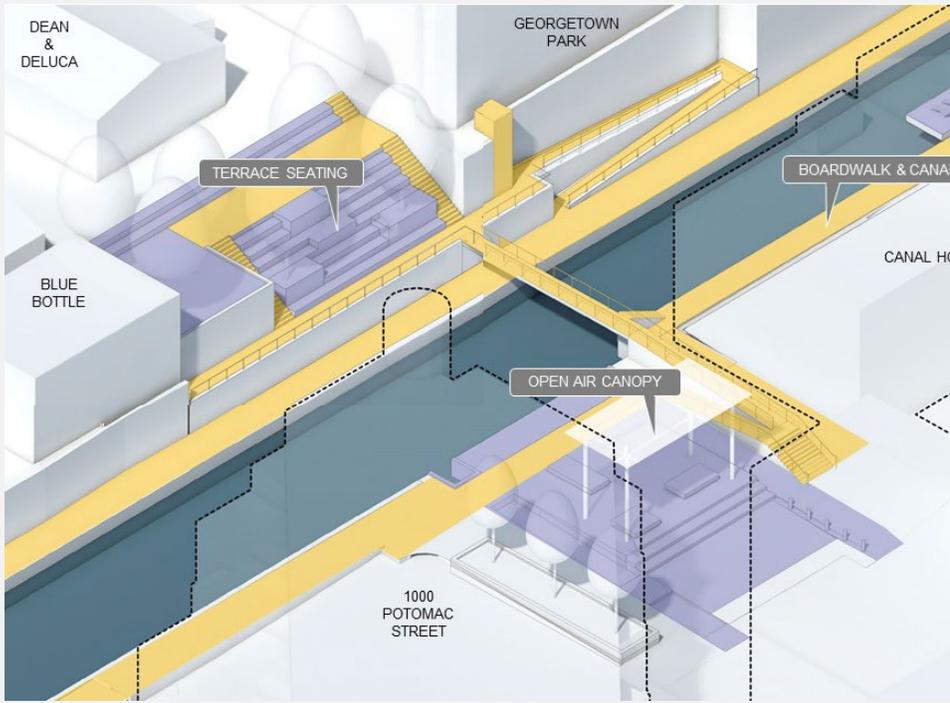
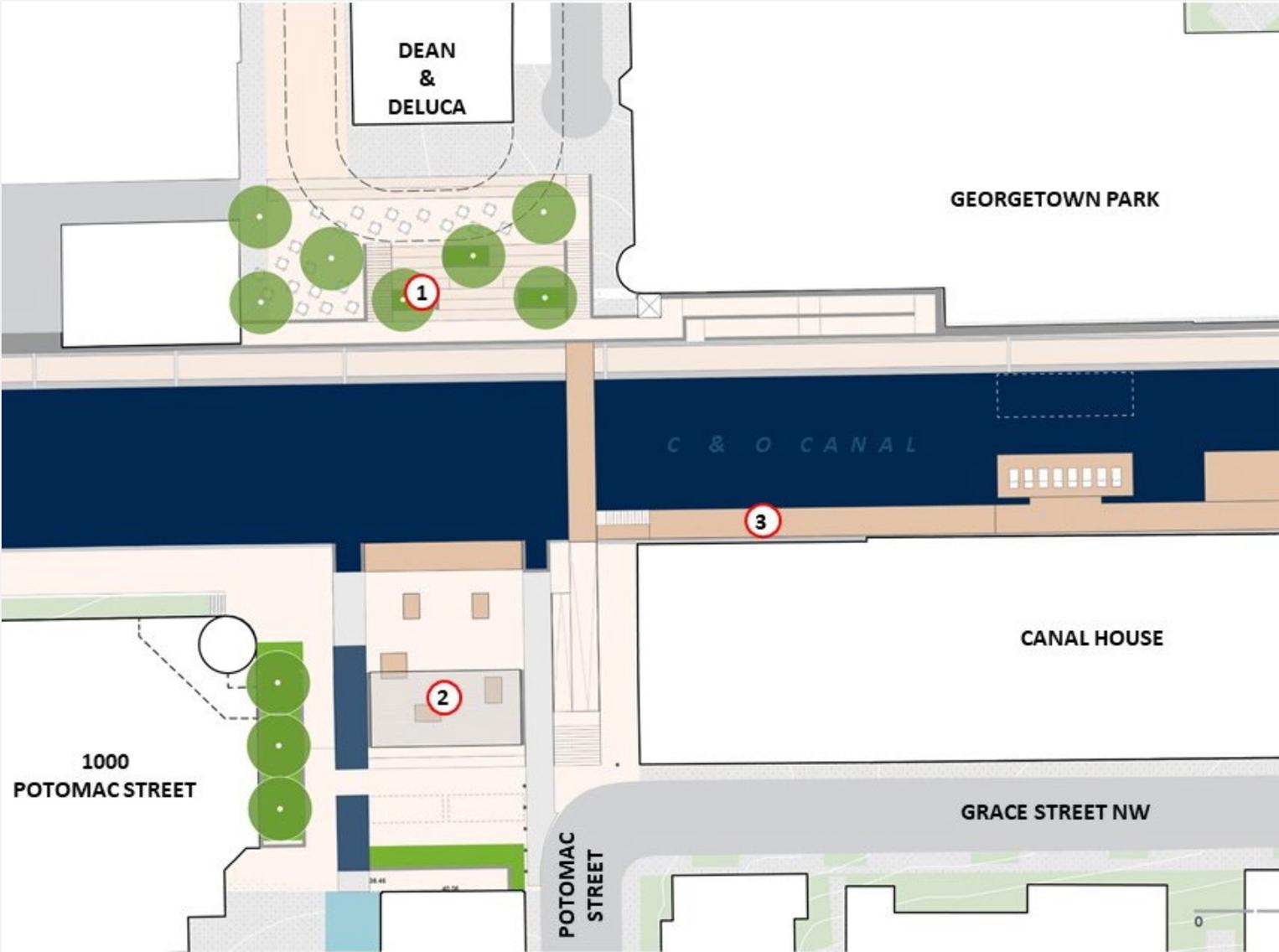
# The Market Plazas – Current Condition



# The Market Plazas – Option A



# The Market Plazas – Option B



# The Aqueduct



# The Aqueduct – Stone Yard - Current Condition



# The Aqueduct – Stone Yard – Option A



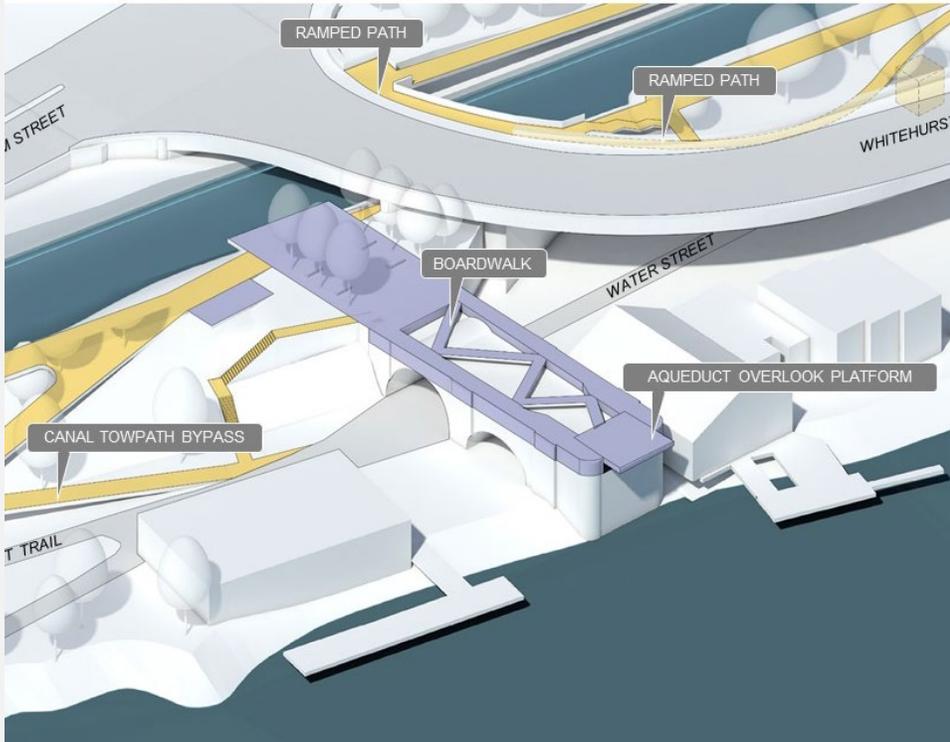
# The Aqueduct – Stone Yard – Option B



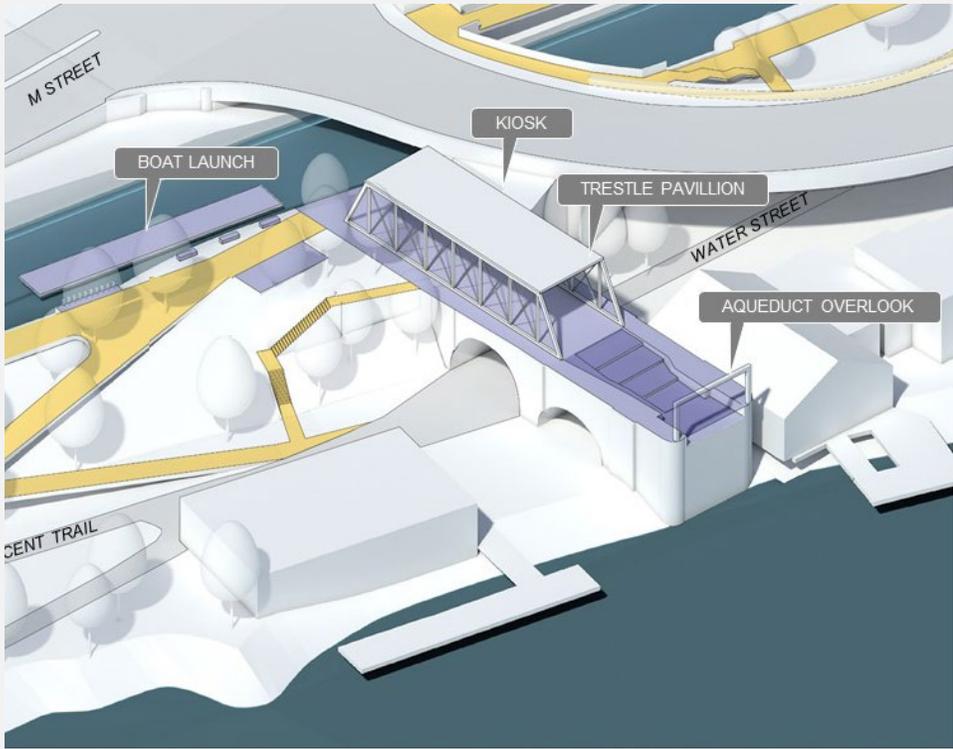
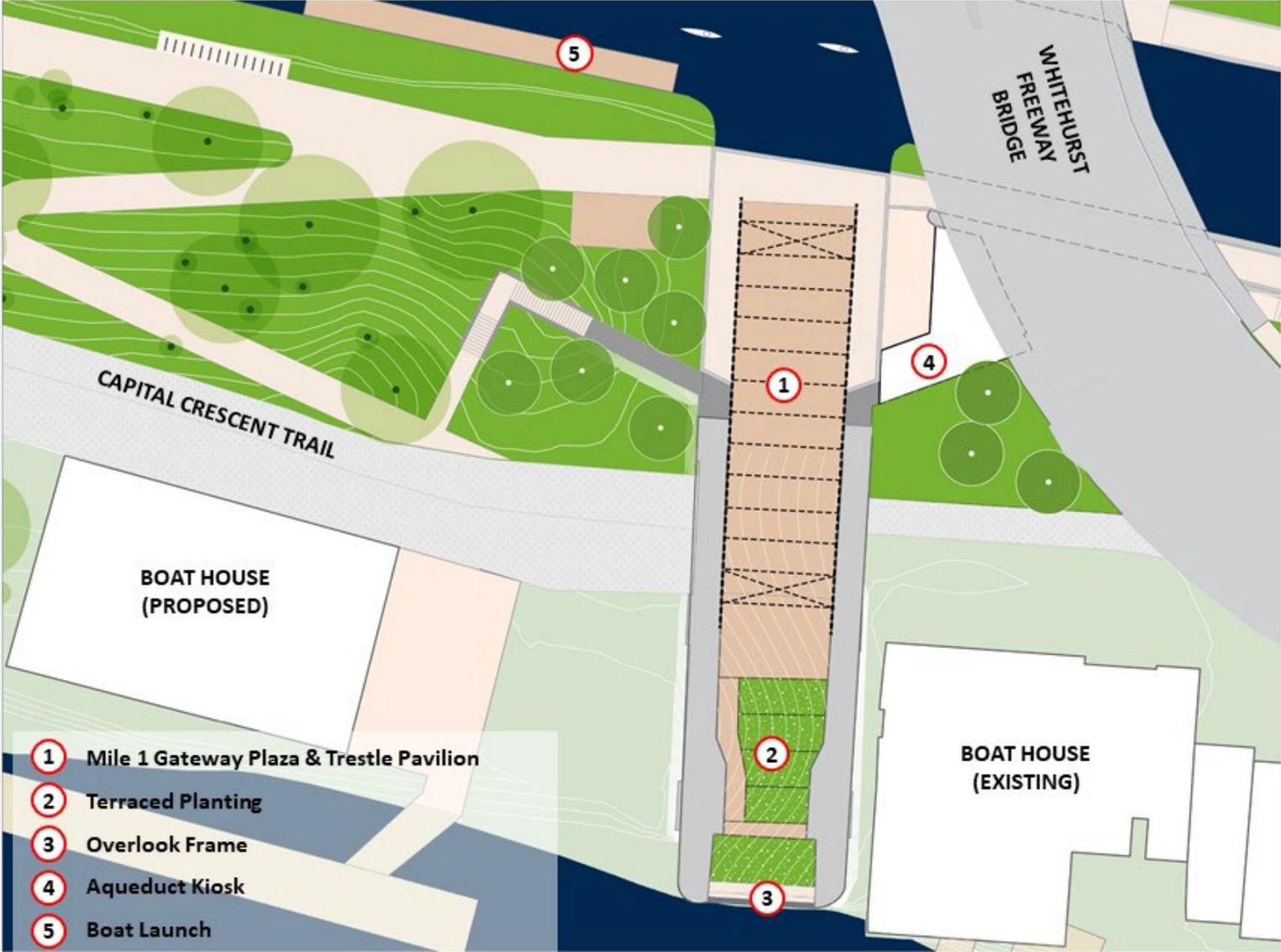
# The Aqueduct – Current Condition



# The Aqueduct – Option A



# The Aqueduct – Option B





April 24, 2019

Superintendent Kevin D. Brandt  
C&O Canal NHP Headquarters Office  
Attn: Georgetown Canal Plan  
1850 Dual Highway, Suite 100  
Hagerstown, MD 21740

Dear Superintendent Brandt:

Thank you for the recent public consultation meeting and presentation on the revised alternative concepts for the Georgetown section of the Chesapeake and Ohio Canal.

We appreciate the development of the ideas, the offering of alternatives, the elimination of some of the potentially problematic features, and the stepping back to a level of detail that seems appropriate for discussion at this stage of development.

Consistent with the regulations implementing Section 106 of the National Historic Preservation Act, we are evaluating the proposals upon how they may adversely affect contributing resources of the canal and the Georgetown Historic District as they stand today. Of course, choices ought to be guided by the Park Service's excellent recent Cultural Landscape Inventory and by our knowledge of the canal's features and environs during its periods of significance.

We believe we share an interest in improving public access to the canal and in retaining varied experiences along its length, with some spaces more naturalistic, quiet or private, and others more activated and visually connected to the surrounding streets. We are interested in retaining original features and materials, in limiting any intrusions into or over the canal prism, and in avoiding paving the tow paths. While acknowledging various "moments" and spaces around the canal, there should be a commonality of materials employed in the paving beyond the towpath, in the bridges, in the elevated and floating platforms and, of course, in the directional and interpretive signage.

We have a few comments at this time and will address the improvements from east to west.

#### Mile Marker Zero

Although a lockkeeper's shack formerly stood east of the tide lock, the land surrounding it was historically informal and even naturalistic, as it remains. Because the opposite side of the tide lock has long been occupied by Thompson's Boat Center, we believe that the constructed features for active uses be placed on that side. The proposed extension of the boat piers would



preferably be held back more from the view from the mile marker. Therefore, we believe that Option B is a more appropriate approach that would minimize adverse effects and balance the active and passive recreation at this location.

#### The Market Plazas

While floating platforms for boating seem fine, not intrusive, and easily reversible, we would like to understand the apparently floating kiosk in Option B. Option B's more potentially problematic permanent feature is the boardwalk extending over the canal.

#### Wisconsin Avenue Cutout

We would appreciate one of the options not proposing the seating/steps under large arches built into the wall. Although this section of wall has been reconstructed, modifying it in this way significantly alters the feeling and experience of this stretch of the canal. It would be helpful to offer a real alternative that minimizes adverse effects. An elevator entrance can be designed to be subtler, without the removal of so much wall.

The canal's commemorative obelisk should be protected, preserved, and allowed some space.

#### The Aqueduct

We recommend against pursuing the "trestle pavilion" of Option B, unless it is to be a genuine reconstruction of the Civil-War-era bridge superstructure—wood trusses and laminated arches. A schematic facsimile may be useful to evoke a vanished structure—such as the lost Benjamin Franklin house in Philadelphia—but here, it would be something of a visual distraction and an inaccurate evocation of the former bridge, which may be illustrated more simply and accurately through interpretive signage. In a sense, the proposal "restores" the aqueduct to a different period, but without carrying the idea through to completion.

It should be noted that the National Capital Transportation Planning Board may grant funds to the Georgetown Business Improvement District to improve the connection between the towpath and the Capital Crescent Trail head. The proposed project area is between the aqueduct and the Whitehurst Freeway, removing the existing stair. This may conflict with or duplicate the ramps and stairs depicted in the present options.

I am sure we will have other thoughts as the project progresses, and as we consider the public comments.

Sincerely,



Tim Dennee  
Historic Preservation Office

# The Committee of 100

on the Federal City



**Founded 1923**

**Chair**

Stephen A. Hansen

**Vice-Chair**

Kirby Vining

**Secretary**

Erik Hein

**Treasurer**

Carol F. Aten

**Trustees**

Charlie Bien

Judy Chesser

George R. Clark

Monte Edwards

Alma Gates

Larry Hargrove

Kathy Henderson

Naima Jefferson

Nancy MacWood

Meg Maguire

Elizabeth Purcell

Laura M. Richards, Esq.

Marilyn Simon

Jim Smailes

Pat Tiller

Evelyn Wrin

945 G Street, N.W.

Washington, D.C. 20001

202.681.0225

[www.committeeof100.net](http://www.committeeof100.net)

[info@committeeof100.net](mailto:info@committeeof100.net)

May 9, 2019

Ms. Lisa Mendelson-Ielmini, Regional Director  
National Park Service  
National Capital Region  
[lisa\\_mendelson-ielmini@nps.gov](mailto:lisa_mendelson-ielmini@nps.gov)  
1100 Ohio Drive, SW  
Washington, DC 20242

Mr. Kevin D. Brandt, Superintendent  
National Park Service  
C&O Canal National Historical Park  
[Kevin\\_Brandt@nps.gov](mailto:Kevin_Brandt@nps.gov)  
1850 Dual Highway, Suite 100  
Hagerstown, MD 21740

RE: Section 106 Review Comments on NPS, C&O Canal Concept Plan

Dear Director Mendelson-Ielmini and Superintendent Brandt:

*The Committee of 100 on the Federal City* submits the following comments on the most recent iteration of the C&O Canal Concept Plan. These comments follow our May 10, 2018, letter to you on the same. The Committee of 100 continues to hold significant concerns about the Concept Plan. What is being proposed for the 1-mile Georgetown canal segment will, if completed, impact adversely the historic integrity of the Canal itself. And while we applaud the National Park Service's (NPS), Georgetown Heritage's, and The Georgetown Business Improvement District's goal of rehabilitating and increasing public access and enjoyment of the Canal, the historic integrity of the site must not be subordinated to recreational, economic, and tourism interests. Federal law, regulation, and National Park Service administrative procedures are clear on discouraging and prohibiting many of the proposals / elements of the draft Concept Plan. These include: Public Law 91-664, Jan. 8, 1971 – To establish and develop the Chesapeake and Ohio Canal National Historical Park, Section 106 (36 CFR Part 800) National Historic Preservation Act, NPS Management Policies 2006, NPS Director's Order 28, Cultural Resources Management

Lisa Mendelson-Ielmini  
Kevin D. Brandt  
May 9, 2019  
Page Two

Guideline, 1997, Release No. 5, and the Secretary of the Interior's *Standards & Guidelines for Federal Agency Historic Preservation Programs* among others.

The Georgetown segment of the C&O Canal is a rare survivor of our Early Republic's and Washington, DC's industrial story. This is particularly true of the one-mile Georgetown segment given the high concentration of associated historic buildings, warehouses, engineering, and landscape. Though changed over the years, much of the Georgetown segment survives and is, by nature, industrial and gritty - rendering inappropriate many of the proposals to "improve" or "re-imagine" the historic property as a recreational destination. Much of the Concept Plan is neither good historic preservation management nor approved NPS Management Policies for a unit of the National Park System.

The entire 184.5-mile C&O Canal is a National Monument and a National Historic Landmark in addition to its Congressional designation as a unit of the National Park System. All argue for the highest level of preservation and conservation over recreational / tourism values – a distinction seemingly misunderstood by those developing and championing the Canal Plan. Too, the fact that the recent success of the New York City High Line appears to be a conceptual touch stone for the Concept Plan further demonstrates a lack of appreciation and understanding of the differences between the historic significance of the High Line and the C&O Canal and what is appropriate treatment for each. One is locally significant and the other nationally. One is a unit of the National Park System – the other not. Treatment strategies for one are not, de facto, appropriate for the other.

No better example of this challenge is evident than the Concept Plan's "re-imagining" the historic towpath. The Plan advocates paving, widening, and cantilevering the path out over the Canal providing wider berth for jogging and walking. It also adds paths along two segments on the river-side of the Canal – where the towpath only historically existed berm-side. Constructed of earth, clay, and gravel, the towpaths are an emblematic, integral, and significant historic property types to the C&O Canal - significant as the Canal itself. Judging from photographs from the 1880's, the towpaths appear today largely unchanged 130 years on. Therefore, the paths should be preserved "as is" in any "re-imagining". Reference please the recent Georgetown Area: Cultural Landscape Inventory, Chesapeake & Ohio, Canal Historical Park National Park Service Plan by Elder and Weldon, August 2018 - approved in 2018 both by the current park superintendent as well as the Washington, DC State Historic Preservation Officer. The remarkably in depth and professional report identifies the towpaths in the Georgetown canal segment as nationally significant elements, retaining high integrity that must be "preserved and maintained" – offering that additional width could be achieved by easily removing the grass verge, replacing it with the proposed "mule kick" in a clearly contemporary material, and / or regrading to achieve a level surface." Why, then, has the National Park Service gone against its own policies and studies in advocating an expensive and intrusive treatment clearly not in the cause of preserving this significant element so far afield from the Service's own and approved recommendation?

Similar issues / questions in the current Concept Plan argue for a more tempered balance between preservation/ conservation and new design/ recreation concepts. These include:

- 1) New Design/ Construction (Particularly at Mile Marker 0 and The Aqueduct Ruin): New construction will inevitably be required for a new era, compliance with statutory and regulatory

- 2) requirements, and improved circulation and access. However, the designs must be compatible with and not detract from the historic context. Recreational “improvements” such as proposed at Mile Marker 0 appear to be intrusive and inappropriate with the Canal’s historic significance and should be modified or eliminated.
- 3) Landscape: Widespread use of landscape material inappropriate to the C&O Canal should be avoided. Historically, the Canal was neither a garden nor a recreational park. The introduction of herbaceous borders or trees throughout, or even wildflowers at the Aqueduct ruin, while undoubtedly popular and attractive, imposes a vocabulary and creates an appearance incompatible and wholly out of character with the historic canal.
- 4) Historic Masonry: The historic Canal stone walls are as significant as any element of the canal prism. No wholesale removal/ destruction should be considered at the 33<sup>rd</sup> Street Bridge or throughout the project area.
- 5) Boardwalks and Docks on Canal: The wholesale introduction of recreational boardwalks and patios is incompatible in material, design, and Canal historic character. While limited new additions are, of course, generally welcomed, boardwalks and docks appear to be so pervasive in the Concept Plan as to have a negative impact on the overall historic character of the Canal. Floating docks on the Canal itself are not appropriate and should not be considered.
- 6) Aqueduct: The historic integrity of the ruin should be treated appropriately. Neither an overlook constructed on the abutment nor trestle at the Aqueduct is compatible with the historic integrity of the resource. The property is not a staging area for recreation or a background/ setting for other construction or design.
- 7) Incorporate Throughout Sustainability, Climate Adaptation, and Resilience: For the Concept Plan to succeed and anticipate future realities, every design choice and alternative selected must be sustainable to withstand flood events. At this design concept stage, it is unclear how effectively and where that goal is being met. But the concern is real. The Committee trusts that the engineering study prepared for the Service (*C&O Canal Lower Reach Flood Response Plan* (December 2016)) guides every aspect of the proposal and property type from towpaths to locks, walls, and the development of response plans. Further communication / briefings with Consulting Parties is strongly recommended.

As we allowed in our letter of a year ago, the Committee of 100 is troubled by many aspects of the C&O Canal Concept Plan – particularly as the National Park Service appears to be not only an advocate but a co-sponsor. We believe the project is “on the wrong path” and needs to be righted before going further. The concepts underlying much of it show a disregard for many of the Service’s statutory and regulatory management norms. A plan that respects better the C&O Canal, the National Park Service, Congressional intention, and the nation’s history is required.

Lisa Mendelson-Ielmini  
Kevin D. Brandt  
May 9, 2019  
Page Four

As before, we would be pleased to meet with you and discuss further any of these issues.

Best regards,



Stephen A. Hansen  
Chair

cc: P. Daniel Smith, Director, NPS [paul\\_smith@nps.gov](mailto:paul_smith@nps.gov)  
Joy Beasley, AD, NPS [Joy\\_Beasley@nps.gov](mailto:Joy_Beasley@nps.gov)  
David Maloney, DC SHPO [David\\_Maloney@dc.gov](mailto:David_Maloney@dc.gov)  
Thomas Luebke, Secretary, CFA [tluebke@cfa.gov](mailto:tluebke@cfa.gov)  
Matthew Flis, Diane Sullivan, Lee Webb, NCPC [matthew.flis@ncpc.gov](mailto:matthew.flis@ncpc.gov)  
[Lee.webb@ncpc.gov](mailto:Lee.webb@ncpc.gov) [diane.sullivan@ncpc.gov](mailto:diane.sullivan@ncpc.gov)  
Rob Nieweg, Betsy Merritt, NTHP [rnieweg@savingplaces.org](mailto:rnieweg@savingplaces.org)  
[emerritt@savingplaces.org](mailto:emerritt@savingplaces.org)  
Rebecca Miller, DCPL [Rebecca@dcpreservation.org](mailto:Rebecca@dcpreservation.org)  
Peggy McGlone, Washington Post [peggy.mcglone@washpost.com](mailto:peggy.mcglone@washpost.com)  
William Brown, AOI [aoiofdc@gmail.com](mailto:aoiofdc@gmail.com)  
John Fowler, ACHP [jfowler@achp.gov](mailto:jfowler@achp.gov)  
Sonya Bernhardt, The Georgetown, [sonya@georgetowner.com](mailto:sonya@georgetowner.com)  
Brendan Wilson, NPS, NCR, [brendan\\_wilson@nps.gov](mailto:brendan_wilson@nps.gov)  
Rick Murphy, ANC Chair [2E03@anc.dc.gov](mailto:2E03@anc.dc.gov)  
Pamela Moore, President, CAG [pmoore@cagtown.org](mailto:pmoore@cagtown.org)  
Cheryl Gray, President-Elect, CAG [cherylwgray@gmail.com](mailto:cherylwgray@gmail.com)  
Richard Hinds, General Counsel, CAG [rhinds@cgsh.com](mailto:rhinds@cgsh.com)  
Jennifer Romm, Chair, GH [Jennifer.Romm@cagtown.org](mailto:Jennifer.Romm@cagtown.org)