

**National Park Service
U.S. Department of the Interior**

**Chesapeake and Ohio Canal National Historical Park
Rock Creek Park
Washington, D.C.**



**Georgetown Nonmotorized Boathouse Zone
Development Plan**

**Environmental Assessment and Section 106 of the
National Historic Preservation Act**

Public Scoping Analysis Report

August 2015

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INTRODUCTION

The National Park Service (NPS), Chesapeake and Ohio Canal (C&O Canal) National Historical Park (NHP) and Rock Creek Park, initiated an Environmental Assessment (EA) to evaluate a range of feasible alternatives for the implementation of nonmotorized boating facilities and related park improvements in the western section of Georgetown Waterfront Park in Washington DC. The proposed project area extends from 34th Street NW within Georgetown Waterfront Park to approximately a quarter-mile upriver from Key Bridge. The project area encompasses both public and private land, and includes portions of the Chesapeake and Ohio Canal National Historical Park, Rock Creek Park, and several privately owned parcels (the Potomac Boat Club, several private residences, and a small parcel accessible from the shoreline only).

The purpose of the proposed action is to establish a Potomac River recreation zone that more fully supports non-motorized recreation; increases the public's access to the river; improves functionality of the Capital Crescent Trail (CCT) as it connects to the Georgetown Waterfront Park; and respects the historic character, natural resources, and existing recreational use of the Chesapeake and Ohio Canal National Historical Park and Rock Creek Park.

The need for such facilities and for other park improvements was confirmed in the 2013 Feasibility Study for a Nonmotorized Boathouse Zone, which found limited public access points for non-motorized boating and paddle sports along the Georgetown waterfront, amid an increase in popularity for non-motorized water sports (canoeing, kayaking, rowing, paddle boarding) within this area. The study also found that current boathouse facilities that provide access to the river, as well as other amenities (boat storage, concessions, access facilities, boat rentals, beach, and docks) in this vicinity are being run at full capacity, and demand for these amenities is expected to increase. In addition, the study noted that the current condition of the CCT and its connection to Georgetown does not provide a safe and compatible transition for pedestrians and bicyclists as they move from the trail through the nonmotorized boathouse zone and on to Georgetown Waterfront Park.

To ensure public and agency involvement in the early planning stages for the EA, public and agency scoping began in 2015, and will continue through the development of the document.

PUBLIC SCOPING

NPS initiated public scoping for the EA by issuing a scoping notice on January 21, 2015 (see appendix A). This notice to initiate the scoping period and announce a public scoping meeting was sent to an email list of 519 recipients and posted to the project's Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov/nmbzea>). Subsequently, a public meeting to solicit community feedback on the initial purpose and need, issues, and preliminary alternatives was held on February 4, 2015, at the Palisades Neighborhood Library, 4901 V Street NW, Washington, DC from 5:00 p.m. to 8:00 p.m. At the meeting, 107 people signed in; the meeting sign-in sheet is included in appendix B.

The meeting began with an open house that allowed the public to circulate among park staff and informational displays that described the project background, study area and current conditions, the purpose and need for the proposed action, and the preliminary alternatives and site constraints. NPS staff gave a brief presentation to explain the project and the processes for the National Environmental Policy Act (NEPA) and section 106 of the National Historic Preservation Act of 1966, as amended (NHPA). NPS also provided a newsletter to attendees that contained information on the project. The newsletter is included in appendix C. All attendees were advised to submit their comments to the park via email, regular mail, PEPC, or on comment forms made available at the meeting.

PUBLIC COMMENTS

The public scoping comment period was open from January 21, 2015, to April 20, 2015. During this time, NPS provided several methods for the community to provide input on the proposed project. At the public meeting, comment forms were provided. Additional opportunities for comment on the project included directing comments to the NPS PEPC or sending written comments directly to NPS.

During the comment period, 189 pieces of correspondence were received. Nine comments were mailed to NPS, 10 were received via email, and 170 were web forms filled out on PEPC.

AGENCY SCOPING

Similar to public scoping, agency scoping began early on in the EA process to ensure all relevant agencies were kept up to date with NPS planning actions. NPS initiated agency scoping with the following agencies with a letter sent on December 22, 2014. NPS also initiated formal consultation with the District of Columbia Historic Preservation Office (DCHPO) with a letter sent on the same date, in accordance with section 106 of the NHPA.

- Advisory Council on Historic Preservation
- US Commission of Fine Arts
- District of Columbia Office of Planning
- District of Columbia Department of Consumer and Regulatory Affairs
- District of Columbia Historic Preservation Office
- District of Columbia Department of the Environment
- District of Columbia Department of Transportation
- National Capital Planning Commission
- National Marine and Fisheries Service
- US Coast Guard
- US Coast Guard, Sector Baltimore
- US Army Corps of Engineers, Baltimore District
- US Fish and Wildlife Service

Additionally, an agency scoping meeting was held on March 18, 2015, from 9:00 a.m. to 10:00 a.m. at the National Capital Region offices, 1100 Ohio Drive SW, Washington DC. Letters inviting agencies to this scoping meeting were sent on March 9, 2015. Letters to agencies are included in appendix D.

AGENCY COMMENTS

In a letter dated November 24, 2014, USFWS responded that the federally endangered Hay's Spring amphipod has the potential to occur within the boundary of the project area. A Biological Assessment is required for major federal actions significantly affecting the quality of the human environment as defined in NEPA. For projects other than major construction activities, USFWS suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat.

In a letter dated January 9, 2015, the National Marine Fisheries Service responded with information on the presence of Endangered Species Act threatened and endangered species and critical habitat listed under its jurisdiction. The following species occur within the Potomac River:

Species	Status
Gulf of Maine Distinct Population Segment (DPS) of Atlantic Sturgeon (<i>Acipenser oxyrinchus oxyrinchus</i>)	Threatened
New York Bight DPS of Atlantic sturgeon	Endangered
Chesapeake Bay DPS of Atlantic sturgeon	Endangered
Carolina DPS of Atlantic sturgeon	Endangered
South Atlantic DPS of Atlantic sturgeon	Endangered
Shortnose sturgeon (<i>Acipenser brevirostrum</i>)	Endangered

In a letter dated February 4, 2015, the District of Columbia Office of Planning provided questions/comments for NPS to consider:

- Are the facilities labeled as storage intended to be open canoe and kayak racks similar to those at Bell Haven Marina?
- What does NPS envision for the third dimension of each boathouse (i.e., height)? The District of Columbia Office of Planning noted that different degrees of bulk may have different effects on historic resources, including the adjacent historic boathouses.

In a letter dated February 27, 2015, the District of Columbia Water and Sewer Authority provided the following comments:

- The District of Columbia Water and Sewer Authority is concerned with the protection of existing infrastructures in the project area, including a water main and the Upper Potomac Interceptor (UPI), Upper Potomac Interceptor Relief Sewer (UPIRS), and their associated access manholes.
- The District of Columbia Water and Sewer Authority strongly suggests NPS coordinate with them during their process of implementing its Combined Sewer System Long Term Control Plan (LTCP), also known as the DC Clean Rivers Project.

In a letter dated April 10, 2015, the National Capital Planning Commission indicated its support of the purpose of the project, and offered comments on the CCT connections and the public boathouses program. It also recommended that the number of car top launch/temporary loading areas be minimized and located east of the Alexandria Aqueduct. Lastly, the National Capital Planning Commission requested to be a cooperating agency on the EA to satisfy its independent responsibility under NEPA.

GUIDE TO THIS DOCUMENT

This report is organized as follows:

Content Analysis Report: This is the basic report produced from PEPC that provides information on the numbers and types of correspondences and comments received, organized by code and demographics. The first section is a summary of the number of correspondences that contain comments for each code and the percentage of correspondences that contain comments under those codes. For example, code *AL1000 Alternatives: Elements Common To All Alternatives* appears in 89 correspondences. This means that 89 correspondences addressed new suggestions for alternatives or alternative elements. Those 89 correspondences also likely addressed other issues, and those comments were categorized under different codes, which is why the total number of correspondences in this table is not the same as the number of correspondences received.

Data are then presented about the correspondence by type (i.e., number of emails, letters); number received by organization type (i.e., organizations, governments, individuals); and number received by state and country.

Concern Statement Report: This report summarizes the substantive comments received during the public scoping period. These comments are organized by codes and further organized into concern statements. Representative quotes are then provided for each concern statement.

Appendix 1 – Correspondence List: This appendix cross-references the unique tracking number assigned to each piece of correspondence and the corresponding commenter name.

Appendix 2 – Public Scoping Notice

Appendix 3 – Public Scoping Newsletter

Appendix 4 – Copies of Letters from Agencies, Organizations, and Businesses: This appendix contains copies of correspondences received from agencies, official representatives from organizations, and businesses, but excludes those received from individual commenters (non-affiliated individuals).

CONTENT ANALYSIS REPORT

Table 1. Correspondence Distribution by Code

Code	Description	# of Correspondences	% of Correspondences
AL1000	Alternatives: Elements Common To All Alternatives	89	25.4%
GA1000	Impact Analysis: Impact Analyses	33	9.4
AL4000	Alternatives: New Alternatives Or Elements	32	9.1
AL3200	Alternative 3 - Low Density	27	7.7
AL3000	Support Alternative 3 - Low Density	18	5.1
MT1000	Miscellaneous Topics: General Comments	17	4.8
PN3000	Purpose And Need: Scope Of The Analysis	17	4.8
AL1000	Support Alternative 1 - High Density	16	4.6
AL2000	Support Alternative 2 - Medium Density	14	4.0
AL5000	Generally Support Boathouse Construction	14	4.0
AL6000	Support No Action Alternative	11	3.1
AL7000	Support Kayak and Canoe Access	9	2.6
PN4000	Purpose And Need: Park Legislation/Authority	8	2.3
AL1200	Alternative 1 - High Density	8	2.3
AL1100	Oppose Alternative 1 - High Density	7	1.9
AL5200	Generally Opposed Boathouse Construction	5	1.4
ON1000	Other NEPA Issues: General Comments	5	1.4
AL2200	Alternative 2 - Medium Density	5	1.4
AL5100	Generally Support Waterfront Access	4	1.1
AL2100	Oppose Alternative 2 - Medium Density	3	0.9
AE20000	Affected Environment: Land Use	3	0.9
AE22000	Affected Environment: Visitor Use	2	0.6
PN9000	Purpose And Need: Issues And Impact Topics Selected For Analyses	2	0.6
AL3100	Oppose Alternative 3 - Low Density	1	0.3
AE1200	Affected Environment: Transportation	1	0.3
TOTAL		351	100%

Note: Because correspondences likely contain comments that are coded under several different codes, the total number of correspondences in this table is not an accurate representation of the actual amount of correspondences received. This is explained further in the “Guide to this Document” section.

Table 2. Distribution by Correspondence Type

Type	# of Correspondences	% of Correspondences
Web form	170	89.9%
Email	10	5.3%
Letter	9	4.8%
Total	189	100.00%

Table 3. Distribution by Organization Type

Organization Type	# of Correspondences	% of Correspondences
Business	5	2.6%
Conservation/Preservation	6	3.2%
County Government	1	0.5%
Federal Government	2	1.1%
Recreational Groups	13	6.9%
State Government	2	1.1%
Town or City Government	1	0.5%
Unaffiliated Individual	159	84.1%
Total	189	100%

Table 4. Distribution by State

State	# of Correspondences	% of Correspondences
DC	67	35.5%
VA	53	28.0%
MD	51	27.0%
Unknown	5	2.7%
NJ	3	1.6%
WV	2	1.1%
PA	2	1.1%
VT	1	0.5%
CT	1	0.5%

State	# of Correspondences	% of Correspondences
WA	1	0.5%
NY	1	0.5%
WY	1	0.5%
ME	1	0.5%
Total	189	100.00%

Table 5. Distribution by Country

Country	# of Correspondences	% of Correspondences
USA	170	89.9%
Unspecified	19	10.1%
Total	189	100%

PUBLIC SCOPING COMMENT SUMMARY REPORT

AL1000 - ALTERNATIVES: ELEMENTS COMMON TO ALL ALTERNATIVES

CONCERN STATEMENT: (Concern ID: 54095) One commenter suggested that George Washington University and Georgetown University should partner with the Washington Canoe Club because the club is in need of financial assistance.

Representative Quote(s):

Corr. ID: 1 **Organization:** Bay Kayaking (Small business) **Comment ID:** 412896 **Organization Type:** Business

Representative Quote: Would it be possible for the Universities that want to build a boathouse to partner with the Washington Canoe Club which is in disrepair and need of financial assistance? Sounds like a win-win to me.

CONCERN STATEMENT: (Concern ID: 54096) One commenter suggested that the wooded area upriver of the Washington Canoe Club provides a natural barrier between the Capital Crescent Trail (CCT) and the Potomac River, and should be preserved.

Representative Quote(s):

Corr. ID: 174 **Organization:** Council of the District of Columbia **Comment ID:** 413041 **Organization Type:** Unaffiliated Individual

Representative Quote: Second, I am asking that the National Park Service only consider options that would preserve the wooded area upriver of the Washington Canoe Club. As I mentioned in my previous letter, the wooded area provides a natural barrier between the well-traveled Capital Crescent Trail and the Potomac River.

CONCERN STATEMENT: (Concern ID: 54097) The following comments were made concerning the bike trails associated with the proposal area:

- Commenters suggested that the current alternatives proposal for a dedicated bike lane across the apron between the Washington Canoe Club and the dock would create safety issues and cause conflict between the general public and club members because the public bike lane would restrict water access and delay the loading and unloading of boats by the club members.
- One commenter was concerned that the planned development would disrupt those commuting along the CCT.
- One commenter supported maintaining the bike path between Water Street and the CCT for bicyclists.
- One commenter recommended that the CCT path from Site A towards Key Bridge should be the same width as it is now for bicyclists and runners with a parallel section for occasional vehicle access to Sites A and B. This commenter also recommended realigning the bicycle route to the north or canal side of Water Street to 34th Street where it would cross over to connect to the existing path in Georgetown Waterfront Park.
- One commenter recommended that the National Park Service provide foot access on a widened shoulder of the CCT, behind the Washington Canoe Club clubhouse.

Representative Quote(s):

Corr. ID: 2 **Organization:** Not Specified **Comment ID:** 412900 **Organization Type:** Unaffiliated Individual

Representative Quote: Alternatives 1, 2, and 3 also each use the Washington Canoe Club launching apron as a pass-through for a nature trail and/or public canoe/kayak launch. This would put a serious crimp in the activities of the hundreds of people who paddle out of the canoe club, many of whom are on the water on a daily basis. Boats cannot be launched and carried to storage racks, classes and coaching

sessions cannot be taught, races cannot be held, and social and service engagements cannot be carried on with continual interruption such as this would create.

Corr. ID: 19 **Organization:** *Not Specified* **Comment ID:** 412923 **Organization Type:** Unaffiliated Individual

Representative Quote: 1. I live in Palisades and commute daily along the CC Trail to my office in downtown DC (10th & G). Should development go forward, I hope that planners/developers do all they can to ensure that there is as little disruption to our daily commutes as possible during this period. While I realize development will cause some disruption, I am concerned that this development might close sections of the CC Trail for extended periods and/or shift bike traffic to the unpaved towpath for extended periods. I hope paved trail alternatives would be created, should there need to be detours caused by construction. I hope strong consideration is given to mitigating these concerns to limit the disruption to those of us who ride through this area everyday.

Corr. ID: 143 **Organization:** Washington Canoe Club **Comment ID:** 413343 **Organization Type:** Recreational Groups

Representative Quote: - WCC members carry boats, some of which exceed 18 feet in length, by themselves. These boats are challenging to carry. As a safety matter, having a public pathway where cyclists and pedestrians are moving perpendicularly to people carrying canoes or kayaks (often with limited visibility) poses significant hazards.

- WCC was pleased that the proposals and statements made by NPS officials at the public meeting recognize the "choke point" created within the C&O Canal NHP where the Capital Crescent Trail, the canal retaining bank, the historic WCC clubhouse, and the Potomac River come together and effectively restrict development of additional structures upstream of WCC site. WCC hopes that NPS sticks to this position.

Corr. ID: 158 **Organization:** *Not Specified* **Comment ID:** 413357 **Organization Type:** Unaffiliated Individual

Representative Quote: - Alternatives 1 and 2 show picnic areas upstream of the WCC clubhouse where WCC members currently store our boats. We urge NPS to reconsider placement of picnic areas and trails through this area. If NPS wants to provide access to the area on undeveloped land upstream of the WCC clubhouse where WCC has traditionally had outdoor storage for its boats, it should be from the Capital Crescent Trail.

Corr. ID: 158 **Organization:** *Not Specified* **Comment ID:** 413366 **Organization Type:** Unaffiliated Individual

Representative Quote: - Address potential congestion, safety, and traffic issues during/after construction along the narrow trailhead of the C&O Canal NHP/Capital Crescent Trail/DC Water sewer access area.

Corr. ID: 160 **Organization:** *Not Specified* **Comment ID:** 413368 **Organization Type:** Unaffiliated Individual

Representative Quote: Access to Site A - Providing access to Site A (site upstream of the Washington Canoe Club (WCC) across the apron in front of the Washington Canoe Club, proposed in all three alternatives really won't work; it will create confusion and conflict for the general public and canoe club members alike and will create huge security issues for the canoe club and its equipment.

Corr. ID: 160 **Organization:** *Not Specified* **Comment ID:** 413371 **Organization Type:** Unaffiliated Individual

Representative Quote: Capital Crescent Trail - As one of the founding board members of the Coalition for the Capital Crescent Trail, I was glad to see the emphasis in all three Alternatives on creating an adequate link between the trailhead behind the WCC and the beginning of Gtown Waterfront Park. This is a long-standing safety and "visitor satisfaction" issue which needs to be addressed, and having a clearly marked and mostly separated trail through this area will be a big step forward.

Corr. ID: 160 **Organization:** *Not Specified* **Comment ID:** 425770 **Organization Type:** Unaffiliated Individual

Representative Quote: Recommendation for access to site A - The best access to Site A is to provide foot access on a widened shoulder of the Capital Crescent Trail, behind the WCC clubhouse. This would take some engineering and re-grading but is feasible without interfering with traffic on the trail. There could be limited motorized access on the CCT during any construction at Site A but absolutely none after that.

Corr. ID: 167 **Organization:** The Potomac Boat Club **Comment ID:** 413279 **Organization Type:** Recreational Groups

Representative Quote: 2. Addressing the Capital Crescent Trail/Bicycle Traffic The drawings for the NMBZ alternatives (High, Medium and Low) indicate a dedicated lane for bike traffic along Water Street, NW. We appreciate the need to rationalize the situation as it exists today; the main entrance to/exit from the Capital Crescent Trail (CCT), a bicycle and pedestrian trail on NPS land, funnels users into or from the center of Water Street, NW through two gates immediately adjacent to PBC under the Alexandria Aqueduct Bridge arch. We are not clear on why the proposed designation of a NMBZ for improving water access for paddlers and rowers has been combined with the matter of designing a safer bicycle pathway on District streets to connect the CCT and the Georgetown Waterfront Park. Separating bicycle, pedestrian and vehicular traffic and making better connections between the CCT and GWP trail are matters that NPS and the District have had 25 years to discuss, explore and create better alternatives. Water Street believing they are going to Key Bridge or Canal Road).

As shown on the drawings, all NPS alternatives (except No Action) show a dedicated bike lane that would severely restrict access to the Club and eliminate space for loading and unloading boats. This design leads to our comments above regarding access to our property. We strongly object to the designs shown. We suggest that the NPS and the District consider a distinct bike lane on the east (or north) side of Water Street extending to 34111 Street NW and crossing there to the Georgetown Waterfront Park bike trail.

Corr. ID: 173 **Organization:** rower at Rock Creek Rowing, using TBC **Comment ID:** 413320 **Organization Type:** Unaffiliated Individual

Representative Quote: 5. I support NPS reconfiguring the Capital Crescent Trail so that the final section of it from Site A towards Key Bridge has the same width path as it does now for bicyclists and runners, plus has a parallel section for occasional vehicle access to sites A and B. The 2 paths would be separated by an appropriate difference in media and marking on the path to ensure safety for bicyclists.

6. From site C and heading downstream, I support NPS realigning the bicycle route to the north or Canal side of Water Street to 34th Street where it would cross over to connect to the existing path in the Georgetown Waterfront Park.

Corr. ID: 176 **Organization:** *Not Specified* **Comment ID:** 413037 **Organization Type:** Unaffiliated Individual

Representative Quote: 3. Please keep a clean connection for bicyclists between Water Street and the Capital Crescent Trail. This is a great biking route, heavily used too. Please don't have non-trail users mixing in with bicycle traffic here.

Corr. ID: 177 **Organization:** Surfrider Foundation - DC Chapter **Comment ID:** 413031 **Organization Type:** Conservation/Preservation

Representative Quote: SAFETY: Alternatives 1 and 2 show picnic areas upstream of the Washington Canoe Club (WCC) clubhouse. Alternatives 1, 2, and 3 depict a trail for public access across the apron between the WCC clubhouse and dock. We urge NPS to reconsider placement of picnic areas and trails through this area as it will create potential safety concerns and interfere with WCC members safe entrance and exit from the river with their boats/boards. If NPS wants to provide access to the area upstream of the WCC clubhouse, it should be from the Capital Crescent Trail.

CONCERN STATEMENT: (Concern ID: 54098) One commenter questioned whether the alternatives include removing existing townhouses and suggested adding a residential component to the project.

Representative Quote(s):

Corr. ID: 29 **Organization:** citizen **Comment ID:** 412934 **Organization Type:** Unaffiliated Individual

Representative Quote: 2. Do Alt 1, 2, and 3 all do away with the existing townhouses? As a past member of the APA (American Planning Association), I will tell you that I believe that these townhouses supply some security to the site. It is not ideal to have residences in the floodplain; however, having residences in this area would facilitate eyes watching out, and would make it safer. I might suggest a small residential component to the project; perhaps associated with the boat houses- -like quarters for a resident manager in each boathouse.

CONCERN STATEMENT: (Concern ID: 54099) Commenters had multiple concerns regarding parking access and kayak launching locations across all preliminary alternatives. Commenters felt that the alternatives would not increase access because parking already has been limited or removed for visitors and local recreational organizations (Washington Canoe Club, Potomac Boat Club, Watersedge, Chesapeake Kayak Adventures) that bring their own boats. Commenters stated that the EA/plan needs to provide paddlers with parking, short distances between the parking location and the water, a soft launch and dock, facilities to dispose of trash, and bathrooms.

Additionally, commenters suggested that the alternatives included in the EA appear to benefit select stakeholders, such as rowing teams, more than the public. Commenters questioned who will control access to the proposed waterfront area and boating facilities and requested that the new space made available to the public exceed the new space made available to private organizations. One commenter voiced concern regarding the possibility of having to belong to an organization or club in order to use the proposed facilities and waterfront area.

Commenters also suggested establishing a car drop-off area large enough to handle watercraft loading/unloading from car and trailers, closing off Water Street to through traffic at 34th Street to allow for parking, coordinating with the DC Department of Transportation, and having in-depth discussions with paddling groups to assess what the EA needs to provide for public paddlers.

Representative Quote(s):

Corr. ID: 2 **Organization:** *Not Specified* **Comment ID:** 412899 **Organization Type:** Unaffiliated Individual

Representative Quote: A first response: while it is important to provide safe pedestrian and cycle access to the area, alternatives 1, 2, and 3 all reduce the available parking for the Washington Canoe Club, Potomac Boat Club, etc. (Parking for WCC is eliminated, in fact.) This area of the city is NOT readily accessible by public transport (the nearest Metro stop is Rosslyn; bus travel through Georgetown is very slow and there are only a couple routes that come within 1/2 mile of the area in question). Public parking in the area is difficult to find, expensive, and not conducive to boat transportation.

Corr. ID: 7 **Organization:** *Not Specified* **Comment ID:** 412910 **Organization Type:** Unaffiliated Individual

Representative Quote: Who will control access to the proposed boat facilities and the water front area?

My concern is that eventually I and other members of the general public will need to belong to an organization or some type of private club to have the privilege to use the proposed facilities or pass through the facilities.

Corr. ID: 11 **Organization:** *Not Specified* **Comment ID:** 412914 **Organization Type:** Unaffiliated Individual

Representative Quote: That aside, I have no preference between the options presented. The key point is that the amount of new space available to the public must exceed the amount of private new space. If

Georgetown wants to build a new 33,000 square foot boathouse, fine, as long as a new 34,000 square foot public boathouse opens first.

Corr. ID: 16 Organization: Chesapeake Paddlers Association **Comment ID: 413244 Organization Type:** Unaffiliated Individual

Representative Quote: My greatest concern is that adequate parking be part of the planning and development going forward. Without it, it will difficult or impossible for the vast majority of boat owners to enjoy any water access, in whatever final form it takes.

Especially so in the case of cartop boat owners, who cannot exactly bike to the waterfront, or take public transportation, with their boat in tow. As I'm sure you know, parking by the waterfront is extremely limited, the vast majority of which is regulated by 2-hour meters, making it impossible to be on the water for more than about an hour and a half, after factoring in the time it takes for put-in and take-out. The nearest garage is a 1/4 mile away next to Chadwicks. This make dropping off your boat and gear, and walking back from the garage, a theft risk in a urban area.

The consequence of eliminating the parking at Key Bridge is that I was able to use my kayak out of Key Bridge a grand total of two times last season. At \$300 for the rental, that's \$150 per use. Not a good deal, would you say? I don't know if I should bother renting space there again, meaning I will have to load up the boat, driving it to work, then find a place to launch elsewhere. More inconvenience, more gas, more time, etc.

If we are to draw cartop boat owners to the waterfront, they will need a place both to unload and a place to park. Otherwise, I assure you, you will have built a nice facility that almost no one will use.

Corr. ID: 26 Organization: Chesapeake Kayakers Association **Comment ID: 425713 Organization Type:** Unaffiliated Individual

Representative Quote: It is already extremely difficult to snag one of these parking spaces and they are only short term, in any case. They would not be useful for boaters unless extended to at least 4 hours, and then they only times they would be free would be at 6 AM in the morning. Maybe not even then.

Why not put some parking dedicated to car top boater owners (not renters) on the park property. Annual permits could be sold for a reasonable cost and a gate installed - as at other parks - to allow access only to those with permits. This way we could actually use the sandy beaches being proposed.

Corr. ID: 26 Organization: Chesapeake Kayakers Association **Comment ID: 413051 Organization Type:** Unaffiliated Individual

Representative Quote: It was very discouraging to attend the public scoping meeting on February 4, 2015 and discover that not one of the three alternatives makes any provision whatsoever for on-site parking dedicated to non-motorized boaters who own their boats and need to park close to the launch area. All the sandy beaches in the world are useless without dedicated parking for those of us who are not renters! I am a kayaker, however, the same problem exists (even more so) for those with canoes. Paddleboarders who are not renting will also have problems without parking. Many of us will be coming solo and are facing a different situation than the schools that can simply drop-off their students or renters who can park blocks away and walk over to rent their boats.

There is no long-term public parking in the immediate area - paid or otherwise. The closest garage is not even open on the weekend. Besides, some of us would not be able to enter the garage with our boats on top of our cars - headroom is limited in the garages. And then, maneuvering out of the garage - - pulling our heavy (50-80 lbs.) 17-19' boats on "trolleys" (as one does) would be a nightmare and dangerous. I can't even imagine navigating around the tight corners from 2-3 levels down in one of those garages. The idea that we can drop off our expensive boats and gear and then drive away searching for parking - hoping our gear is still there when we return perhaps 1/2 hour later (and then repeating the whole drill at the end of the day) is ill-considered.

One of the planners told me at the break that the Park Service would "never consider" putting dedicated parking on any of the park property itself - that the Park service was counting on the District of Columbia to solve the parking problem. This is ridiculous. I can't think of another federal park in the United States without on-site parking. Even protected areas such as Denali National Park have a way to reach the center of the park by car.

Corr. ID: 47 Organization: Potomac Kayak Club **Comment ID:** 413257 **Organization Type:** Recreational Groups

Representative Quote: Eliminating the existing Key Bridge Boathouse and its tiny parking lot. Only crew teams would benefit from the Park Service plans.

Paddlers need a Put-in, Parking, and a Porta John. The Park Service proposals do not provide these and therefore fail to meet their own stated goal of increasing access to the river. Only a tiny group of University and high school rowers would benefit from these proposals. On-site paddler parking is essential.

The Boathouse Zone Development Plan should be to establish a Potomac River recreation zone that more fully supports non-motorized recreation, increases access to the river, improves functionality of the Capital Crescent Trail as it connects to the Georgetown Waterfront Park, and respects the historic character, natural resources and existing recreational use of the C and O National Historic Park and Rock Creek Park. It doesn't take a rocket scientist to view the plans to realize that the National Park Service is not working for the average citizen. Specifically, the Park Service plans do not support non-motorized recreation and actually reduce access to the river for the majority of non-motorized boaters.

Corr. ID: 48 Organization: Bay Kayaking LLC **Comment ID:** 413188 **Organization Type:** Business

Representative Quote: I have previously commented on the options for the Georgetown waterfront. I failed to previously recognize the total lack of parking and ability for car top boat users to access the water because they lack a place to leave their vehicle while unloading or park once on the water.

Parking must be addressed for your plan to be useful to the vast majority of water access users. The two fastest growing water sports is recreational kayaking and kayak fishing. Your current plans make your waterfront park useless to the fastest growing segments.

Corr. ID: 49 Organization: Chesapeake Kayak Adventures **Comment ID:** 412933 **Organization Type:** Unaffiliated Individual

Representative Quote: As avid kayakers in the region, we were hoping that the NPS plan would increase public kayak access to the Potomac River. That is not the case, as evidenced from the three plan alternatives. I expected to see parking in the vicinity of the soft launch area, as well as a larger dropoff area for people who like to bring their own boats.

For the High Density alternative, it appears that the only option at this location is to rent kayaks. The Medium Density alternative has two launch areas, one accessible from a car dropoff, the other only by a trail. It appears the far launch would be primarily for members of the Washington Canoe Club, not the general public. The nearer launch is accessible from a dropoff about 65 feet across (standard parking bay) which would become pretty congested quickly. I'm not sure how people get a boat to the launch shown in the Low Density alternative unless it is already stored at the Canoe Club.

Corr. ID: 50 Organization: *Not Specified* **Comment ID:** 412932 **Organization Type:** Unaffiliated Individual

Representative Quote: I am writing to demonstrate my disfavor of the current recommendations reflected in the Georgetown Non-motorized Boathouse Zone Development Plan.

I am a member of two major kayaking organizations, Watersedge and Chesapeake Kayak Adventures. I frequently paddle on the Potomac and therefore fully appreciate the difficulties of accessing this area. Rather than utilizing taxpayer's money to support a few I am requesting you reconsider the current recommendations and include amendments which would improve the parking area. This would allow

clubs such as I mentioned to access this area without the fear of being towed.

If the intention is to truly improve access then please take the time to reevaluate and not go through with the plan in its current format.

Corr. ID: 53 Organization: Chesapeake Kayak Club, Washington Kayak Club **Comment ID: 413267**
Organization Type: Unaffiliated Individual

Representative Quote: It's clear that the plan DECREASES access for paddlers by eliminating the existing Key Bridge Boathouse and its parking lot. Only a small group of collegiate and high school rowers would benefit from these proposals. What would be clearly missing for paddlers is a convenient place to park & a place to launch their boats.

Instead of encouraging non-motorized boating in Georgetown, the proposals would make it much more difficult.

Corr. ID: 56 Organization: *Not Specified* **Comment ID: 413200** **Organization Type:** Unaffiliated Individual

Representative Quote: I have faith that my fellow paddling Americans will deluge you with comments proclaiming that all four of the presented options are awful. Regretfully, I must agree with them but hopefully I can expound upon these inadequacies in more detail.

Firstly, I can clearly see that these are early level concept plans and there is no user data backing them up aside from the earlier purpose & need study. I believe during your data collection phase, you will see that the number of potential non-team affiliated users vastly exceeds the number university or private rowing clubs. Many of these clubs and teams already have adequate access means from other points along the river. While I'm not against expanding their access with an additional boathouse and dock, I believe it offers a poor return on investment for the number of additional users you will get (especially at site E).

The typical recreational paddler in the region will likely car-top their boat from home, then carry it on their shoulders or in a wheeled cart down to the shoreline. Those who are very experienced or who have assistance may be comfortable launching from a floating dock, but the vast majority of them are not. Hence most users would have to park at a meter (more on this later), then haul their boat a minimum of 1/8 of a mile along the trail to get to the beach. In your high density option, this distance increases to at least 1/4 mile. In all of your concepts, you have placed the 230' boathouse directly adjacent to the existing parking, allowing simple access for those retrieving a stored boat, but creating a long and backbreaking trek to those users who brought their own craft from home.

Corr. ID: 67 Organization: *Not Specified* **Comment ID: 412944** **Organization Type:** Unaffiliated Individual

Representative Quote: I don't see how any of the 3 plans proposed would help access to the Potomac for kayaks. It seems that you are taking the parking away which is one of the things we mostly need to paddle around DC. I thought that one goal of Park Services was to increase water access for the general population, not restrict it to make it available to a few privileged paddlers.

Corr. ID: 74 Organization: *Not Specified* **Comment ID: 413224** **Organization Type:** Unaffiliated Individual

Representative Quote: What is needed is simple: easy drop-off access, parking and bathroom/changing facilities. These were available with the original "Jack's" business which, unfortunately, was dismantled by the Park Services previous actions. Any proposals that don't have ease of access for boat drop-offs and parking at a bare minimum are doomed to fail - or worse - they'll only be utilized by the affluent Georgetown community who live in the area and can walk to the water.

Corr. ID: 74 Organization: *Not Specified* **Comment ID: 413223** **Organization Type:** Unaffiliated Individual

Representative Quote: None of the proposals put forward for the development of the waterfront will achieve the proposed goals of giving greater access to the water for the non-motorized boating

community. The proposals will benefit the university rowing community which already has a huge advantage over the average paddling community member.

Corr. ID: 77 Organization: Chesapeake Kayak Adventures **Comment ID:** 413227 **Organization Type:** Unaffiliated Individual

Representative Quote: The Park Service plans to create a large boathouse and use area for university and high school rowing teams without accommodating the huge numbers of people who use kayaks, canoes, and Stand up paddle boards is wrong headed and unfair to tax payers. It seems to me that a Georgetown launch site with ample parking for the huge community of non-motorized boaters is what is needed to benefit citizens of the state of Maryland. The crew teams certainly deserve facilities and water access as well. Surely, the park service could implement a better plan to benefit all non-motorized boaters.

Corr. ID: 80 Organization: *Not Specified* **Comment ID:** 413221 **Organization Type:** Unaffiliated Individual

Representative Quote: My concern is that the plans seem to indicate less parking would be available as a result of the redevelopment. This would put the redevelopment at odds with the stated objective, which is to increase access of the Potomac to users of non-motorized boating equipment.

Corr. ID: 84 Organization: *Not Specified* **Comment ID:** 413231 **Organization Type:** Unaffiliated Individual

Representative Quote: How do any of the three options help nonmotorized boat access? We need three things for access. One, a place to put the boat in the water, beaches work best, docks the worst. Two, a place to unload the boat from the car without too much of a carry. Three, a place to park while we are on the water. While one of your proposals has a small beach there is no way to get a boat to it, and no parking. The other two proposals are worse. If you really want to provide more water access in Georgetown for canoes, kayaks and paddle boards you must address these three issues

Corr. ID: 85 Organization: Rock Creek Rowing Inc **Comment ID:** 413234 **Organization Type:** Recreational Groups

Representative Quote: - We enthusiastically support college or private ownership of one, or at most two boathouses. We strongly suggest that there are assurances that they will not, however, be sole use space. Agreements that include accommodations to make some space available to high school or masters programs should be established during the planning process. An example of a long standing shared agreement is the Potomac Boat Club's housing of the Washington and Lee High School rowing program. Both entities benefit from this situation. Additional space is a crucial need, and a boathouse on the river in or near public space is a privilege for any/all rowers. Sole ownership and use of new boathouses will create a situation that would not provide adequate relief for the significant overcrowding at Thompsons.

- We suggest that the space furthest upriver, where parking access will be the greatest challenge, be considered most appropriate for those teams who will have the lowest daily parking use needs. For example, Georgetown University is mostly foot traffic and some nearby high schools such as Wilson, Georgetown Visitation, Georgetown Day School, the National Cathedral School, and St. Albans have easy access to public transportation and would have less impact on parking.

- New facilities should be built to be energy efficient and allow year round access.

- Whereas the importance of additional boat space and access cannot be underestimated, the maintenance and upkeep of Thompson Boat Center should be considered in the planning process. It is very likely, given the current extreme overcrowding, that even the high density plan will not relieve fully the overuse issue at Thompsons. Thompsons is in need of significant repairs and a more sustainable maintenance plan. In addition, the building has no heat or water during the off season and therefor the building is not accessible. Winter access would provide space for off season training, a potential revenue stream for the facility.

- Protected, indoor, space is optimal for safe equipment storage. We would support, however, access to outdoor storage in the event that the high density plan is not selected.

Corr. ID: 87 Organization: *Not Specified* **Comment ID:** 413333 **Organization Type:** Unaffiliated Individual

Representative Quote: The Park Service says its goal in Georgetown is to increase public access to the Potomac River, but the plans you propose would actually decrease access for the vast majority of users of non-motorized boats.

There are a half million non-motorized boaters in the Washington/Baltimore/Arlington Statistical Metropolitan Area (W/B/A SMA). These half million non-motorized boaters need three things: a place to park the vehicle that got their non-motorized boat to the water, a rest room, and a soft launch for their non-motorized boat. The plans do not address these needs.

The development plan offers 900 feet of docks; however, non-motorized boaters do not need docks to launch their boats. The plans take away the existing Key Bridge Boathouse and its small parking lot and replace them with no parking and therefore no practical way to launch kayaks, canoes, or stand-up paddleboards.

Corr. ID: 90 Organization: Chesapeake Paddlers Assoc **Comment ID:** 413085 **Organization Type:** Unaffiliated Individual

Representative Quote: The proposed boathouse and docks at the Georgetown Non-motorized Boathouse Zone does not benefit the vast majority of non-motorized boaters. The only group benefiting from the proposal are the very small number of rowing teams and scullers. What the vast majority of non-motorized boaters need are three things: a place to park the vehicle that got their non-motorized boat to the water, a rest room and a soft launch for their non-motorized boat. None of the three action alternatives addresses all three of these needs. Please give us options that allow the average citizen to have access to these areas.

Corr. ID: 97 Organization: Rock Creek Rowing, PRC, Washington Lee HS **Comment ID:** 413095 **Organization Type:** Unaffiliated Individual

Representative Quote: Of additional concern is that parking in the Georgetown waterfront area is difficult and a constraint for public access to the river and for the dropoff of boats by car or trailer. The parking lot at Thompson's is currently the largest area available for this purpose, and any design for facilities along the Georgetown waterfront or upriver needs to address space for adequate and safe loading and unloading of boats, as well as parking of vehicles at a reasonable distance from launching areas. Timing of access, loading and parking needs should be considered, as many teams and single rowers use the river at sunrise and/or late afternoon, while other small boat users or paddle craft use the river at other times when there is limited street and private lot parking. It is possible that space furthest upriver, where parking access will be the greatest challenge, be considered most appropriate for those teams who will have the lowest daily parking use needs. For example, Georgetown University has mostly foot traffic and some nearby high schools such as Wilson, Georgetown Visitation, Georgetown Day School, the National Cathedral School, and St. Albans have easy access to public transportation and would have less impact on parking.

Corr. ID: 97 Organization: Rock Creek Rowing, PRC, Washington Lee HS **Comment ID:** 413094 **Organization Type:** Unaffiliated Individual

Representative Quote: In the public interest, I suggest that new facilities are not established for a single organizations use, and that agreements to make space available to other college, high school, community or masters programs should be established during the planning and permitting process. An example of a long standing shared agreement is the Potomac Boat Club's housing of the Washington and Lee High School rowing program. Both entities benefit from this situation. Sole ownership and use of new boathouses will create a situation that would not provide adequate relief for the significant overcrowding at Thompsons.

Corr. ID: 106 **Organization:** Chesapeake Paddlers Association (CPA); Washington Kayak Club (WKC) **Comment ID:** 413274 **Organization Type:** Unaffiliated Individual

Representative Quote: 2. PUBLIC FACILITIES: It was unclear what additional facilities would be provided that best reduces environmental impact. However, given the current and projected activity and popularity along this waterfront.

- 2a. I would support installation of a public picnic area, distribution of waste disposal cans and provision for restroom facilities (portable?) within proximity of the public canoe/kayak launch sites.

- 2b. I strongly recommend that NPS model the inclusion of these facilities of the canoe/kayak launch sites at Fletcher's Boathouse - NPS Recreational Park.

Corr. ID: 107 **Organization:** Canoe Cruisers Association **Comment ID:** 413107 **Organization Type:** Recreational Groups

Representative Quote: I have reviewed your plans, and I do not see any provision for parking. Many people in the DC area own non-motorized boats (canoes, kayaks, etc.) which we transport on the roof of our cars. To make the area useful for us, we need a parking lot. Without a place to park, you are restricting usage to people who walk in and rent boats.

As a boat owner, I am happy to pay parking and boat launch fees, as are most paddlers, but you will not see that revenue without a parking lot.

Corr. ID: 130 **Organization:** *Not Specified* **Comment ID:** 413137 **Organization Type:** Unaffiliated Individual

Representative Quote: None of the proposed plans by the Park Service promote use of the Potomac by the public. The public needs a place to park that is near the water where they can launch their kayak or canoe. Restrooms would be desired as well. None of the proposed plans will address these needs.

Corr. ID: 140 **Organization:** *Not Specified* **Comment ID:** 413050 **Organization Type:** Unaffiliated Individual

Representative Quote: In the town where bills are voted on and decisions are made to improve the welfare of the people I'm presenting my plea to be that one voice that makes a difference regarding parking at the Key Bridge Boathouse in DC.

I'm a new member in the group titled "the Washington Kayaking Club". I joined the club to enjoy one of the many activities available in DC. Since I'm not familiar with DC I can't give advice on moving structures or dictating where picnic tables should be placed as stated by one of our organizer. However, my journey to DC. is a two hour drive. I'll be transporting a kayak on a trailer, behind my car. When I arrive I'd like my parking experience to be convenient. After all, I'm coming to DC. to experience the pleasures of viewing the Historic Georgetown from my Kayak. And I would like the memories, of the day, to be pleasant. As opposed to encircling to find a parking spot. Then, carrying my kayak to the river. Perhaps an easy task if you're 40-ish. Now, in my retirement, that task could be difficult. To sum it up, if the experience becomes a hassle because parking is now rerouted to a remote location why would I initiate the trip. The basic service, providing easy accessible parking for any trailer, should be convenient. Thank you for reading my comments.

Corr. ID: 144 **Organization:** Anne Arundel County Water Trail Committee **Comment ID:** 413064 **Organization Type:** County Government

Representative Quote: We have found that public water access requires 4 basic things:

- 1) an open gate
- 2) ample parking
- 3) a short carry to the waterfront
- 4) a portapotty

Kayakers need parking to load and unload their kayaks and leave their cars while out on the water for

indefinite periods of time. There is little existing parking in Georgetown near the NPS site. The NPS Plan does not create parking. This total lack of parking effectively limits the use of this proposed access point to the private universities that will use the boathouses in the NPS plan.

Kayakers also do not need boathouses. Most of us store our kayaks in our garages, back yards or storage sheds. I have 3 kayaks in the basement of my split-level house. The general public does not need the boathouses and extensive floating dock system to launch kayaks. We need only a small section of non-hardened shoreline.

Corr. ID: 158 **Organization:** *Not Specified* **Comment ID:** 413362 **Organization Type:** Unaffiliated Individual

Representative Quote: - NPS must address traffic flow, vehicular access to boat houses and launch facilities, and parking in the area for boathouse patrons. It is not realistic or pragmatic to close off Water Street at 34th Street as depicted in Alternatives 1, 2, and 3 and tell people using existing or new non-motorized boating facilities that they must park on the street or in commercial facilities in Georgetown. I encourage NPS to work with DC Department of Transportation to close Water Street to through traffic at 34th St, and allow parking for regular users (WCC, Potomac Boat Club, and patrons of commercial non-motorized recreational boating facilities) and access for trailers and individual cars to designated drop off lots. Having "launch areas" without providing vehicular access and parking makes little sense.

Corr. ID: 164 **Organization:** Georgetown Business Improvement District **Comment ID:** 413263 **Organization Type:** Business

Representative Quote: 4) NPS should consider transportation options for specific users to get to and from the boathouse zone, and it should work hard to develop additional plans and facilities both inside and outside of the NMBZ study area to accommodate all the paddlers and rowers who need river access while minimizing new access and congestion issues in the Georgetown Waterfront district.

CONCERN STATEMENT: (Concern ID: 54103) One commenter suggested using open property farther downstream along the Georgetown waterfront as an alternative proposed location for the picnic areas currently included in Alternatives 2 and 3.

Representative Quote(s):

Corr. ID: 26 **Organization:** Chesapeake Kayakers Association **Comment ID:** 413053 **Organization Type:** Unaffiliated Individual

Representative Quote: Alternatives 2 and 3 have areas labeled "picnic area". There is a HUGE amount of park property along the Georgetown waterfront suitable for picnic tables. The area by the maze and fountain, for example. There is so much open space there now that is not being used because the places to sit are so limited. This is where it would make sense to put any picnic benches - where there are many, many families using the park space!

CONCERN STATEMENT: (Concern ID: 54104) One commenter noted that the National Park Service needs to protect the C&O Canal National Historical Park from private development to preserve the viewshed within the Potomac Gorge, and natural, historic, and cultural resources. The commenter recommended that any private development should occur outside of the C&O Canal National Historical Park.

Representative Quote(s):

Corr. ID: 31 **Organization:** Defenders of Potomac River Parkland **Comment ID:** 413070 **Organization Type:** Conservation/Preservation

Representative Quote: 1. Protect the C&O Canal National Historical Park from private development. 2. Preserve the sensitive natural, historic and cultural resources of the C&O Canal NHPark; also the viewshed within the Potomac Gorge.

4. Team rowing facilities should be located outside of the C&O Canal NHPark on degraded land in need of redevelopment.

Corr. ID: 166 **Organization:** *Not Specified* **Comment ID:** 413293 **Organization Type:** Unaffiliated Individual

Representative Quote: 4. Public vs. private ownership of boathouses:

Whether the alternatives will serve a preponderance of private interests (i.e., politically powerfully private universities such as Georgetown and George Washington) at the expense of the public interest. Whether NPS will retain the land and build multi-use public boathouses comparable to Thompson's Boathouse in Georgetown, in order to meet the growing public need while ensuring the land and buildings and associated wildlife habitat are preserved in a manner consistent with their designation as national park property.

Whether preservation and public use of national parkland can co-exist with meeting multiple boathouse needs.

CONCERN STATEMENT: (Concern ID: 54105) Commenters provided information on the Combined Sewer System Long Term Control Plan (LTCP), also known as the DC Clean Rivers Project, which could potentially occur in or near the nonmotorized boathouse zone project area, and suggested that the LTCP be considered in the EA. One commenter suggested that the DC Clean Rivers Project may reduce potential impacts on the nonmotorized boathouse zone project area. Additionally, the commenter suggested that the nonmotorized boathouse zone project implementation should provide space to construct and maintain the tunnel and associated surface facilities in this area. Another commenter questioned how DC Water will access its facilities in the area (Combined Sewer Overflow 029, Upper Potomac Interceptor, and Upper Potomac Interceptor Relief Sewer facilities) for maintenance and repair.

Representative Quote(s):

Corr. ID: 153 **Organization:** District of Columbia Water and Sewer Authority **Comment ID:** 423479 **Organization Type:** State Government

Representative Quote: The Project Area is also a key access point for facilities to the west, between the C&O Canal and Potomac River, including CSO 029 (approximately 750 feet west of the project area) and additional portions of the UPI and UPIRS. The NMBZ EA should consider how DC Water will access these facilities for regular and emergency maintenance, repair, and improvement.

Corr. ID: 153 **Organization:** District of Columbia Water and Sewer Authority **Comment ID:** 413306 **Organization Type:** State Government

Representative Quote: 2. Coordination with Future DC Clean Rivers Project Facilities

DC Water is also in the process of implementing its Combined Sewer System Long Term Control Plan (LTCP), also known as the DC Clean Rivers Project. The purpose of this project is to control CSOs into the District's waterways, which occur when the existing combined sewer system's capacity is exceeded during storm events. The project will improve water quality and reduce trash in the District's receiving waterbodies through the reduction of untreated discharge from the combined sewer system. In addition, the project is required by the 2005 Federal Consent Decree entered into by DC Water, the District of Columbia, the U.S. Department of Justice, and the U.S. Environmental Protection Agency.

The Potomac River Tunnel (PRT) project, currently in the planning phase, is the portion of the DC Clean Rivers Project which will provide control for the CSOs along the Potomac River, including CSOs 027, 028, and 029 (see attached Figure 2). The PRT will consist of a storage tunnel and supporting infrastructure, potentially including diversion facilities connecting to existing sewers, drop shafts, overflow structures, and ventilation control facilities. Construction and maintenance of the PRT facilities associated with CSOs 027, 028, and 029 may potentially occur in or near the NMBZ Project Area and should be considered in the NMBZ EA. The NMBZ implementation should provide space to construct and maintain the tunnel and associated surface facilities in this area. DC Water and NPS are currently co-

lead agencies in the development of an Environmental Impact Statement for the PRT project.

DC Water has proposed modifications to the existing LTCP to include Green Infrastructure (GI) and Sewer Separation for the Potomac River CSOs west of Rock Creek. In the proposed plan, CSOs 027, 028, and 029 would be controlled by implementing GI practices throughout their sewer sheds. While this modification may reduce potential impacts to the NMBZ Project Area, new facilities in the Project Area may be proposed as part of the project planning process and existing facilities will remain in service.

CONCERN STATEMENT: (Concern ID: 54106) One commenter suggested that the National Park Service should require all watercraft-based recreational organizations in the area to have similar requirements as the Universities with concerns to public water access.

Representative Quote(s):

Corr. ID: 171 **Organization:** Rock Creek Rowing & Former Wilson High School Crew Booster
Comment ID: 413082 **Organization Type:** Unaffiliated Individual

Representative Quote: 6. If you consider restrictions on the Georgetown project, please be fair. Disparate treatment is unacceptable. Any restrictions placed on Georgetown University should likewise be placed on all private non-profits that operate within the C & O Canal Park. If NPS requires GU to be open to the public, then the same requirements must be made of the Canoe Club or any other private group with similar status.

CONCERN STATEMENT: (Concern ID: 54107) One commenter suggested that fishing activities should be prohibited along the Georgetown nonmotorized boathouse zone waterfront because fishing lines and detached hooks could threaten the safety of paddlers.

Representative Quote(s):

Corr. ID: 106 **Organization:** Chesapeake Paddlers Association (CPA); Washington Kayak Club (WKC) **Comment ID:** 413276 **Organization Type:** Unaffiliated Individual

Representative Quote: 5. FISHING:
- 5a. All fishing activity must be prohibited with appropriate enforcement, along the Georgetown NMBZ Waterfront. Fishing activity would a serious danger for paddlers and visitors, since fishing lines may pose entanglement risks to people and wildlife; and detached hooks would pose puncture injury, along beach launch zones.

CONCERN STATEMENT: (Concern ID: 54108) One commenter suggested that Key Bridge Boathouse should be relocated from Site D to Site C. Additionally, the commenter suggested that constructing a building of any height at Site C would block the view of the Potomac River from the CCT and C&O Canal Towpath.

Representative Quote(s):

Corr. ID: 28 **Organization:** Not Specified **Comment ID:** 413324 **Organization Type:** Unaffiliated Individual

Representative Quote: Site C. This site is located between the eastern boundary of the Washington Canoe Club property and the Aqueduct Bridge. It was formerly known as the Dempsey site. Key Bridge Boathouse, a canoe and kayak rental operation, should be relocated from Site D to Site C. Since there is no "boathouse," but only a small "log cabin" office, relocation would be relatively easy. The Key Bridge Boathouse rental operation consists ostensibly of floating docks strung together on which kayaks and canoes are stacked. Therefore, moving the Key Bridge Boathouse operation to Site C would result in only a minor inconvenience. Also noteworthy, at this location a boathouse of any size would block the view of the Potomac River from the Capital Crescent Trail as well as the C & O Canal towpath. While this well-

stocked rental operation serves the growing public demand for water-related activities, this relocation should not diminish its availability. By placing the Key Bridge Boathouse next to the Washington Canoe Club, there would be the additional benefit of grouping like users (paddlers) side by side on the waterfront.

CONCERN STATEMENT: (Concern ID: 54109) One commenter suggested that there were many advantages to locating a boathouse on Site D, including:

- The site is within the nonmotorized boathouse zone, but outside the C&O Canal National Historical Park, so no adverse impacts on the historic and scenic features of the C&O Canal would occur.
- There would be no height restrictions on the boathouse at this site.
- Pedestrian congestion would not create any safety issues.
- The site is easily accessible with no requirement for a vehicular turn-around.
- Site D poses no environmental concerns.

Representative Quote(s):

Corr. ID: 28 **Organization:** *Not Specified* **Comment ID:** 413325 **Organization Type:** Unaffiliated Individual

Representative Quote: Site D. The Park Service and Georgetown University should give serious consideration to locating the GU boathouse at Site D, the current location of the Key Bridge Boathouse operation. This site is the area between Key Bridge and the Potomac Boat Club and includes the three townhouses. With respect to the townhouses, the Park Service will acquire the first two (3524 and 3526 Water Street) from George Washington University in exchange for GW's boathouse site at Site E located between Key Bridge and 34th Street. I further understand that the Park Service intends to acquire the third townhouse (3528 Water Street) which is currently owned by "3528 K Street Associates LP." The Park Service would then have the townhouses razed as they are considered inappropriate for this location. Of course in order to acquire this property from the Park Service, Georgetown University would exchange its up-river parcel and its mile-long easement over the Capital Crescent Trail.

The estimated length of Site D along the Potomac River is about 200 feet, along Water Street about 230 feet, and the depth from the street to the river about 100 feet. If the average length of this site is about 215 feet, the square footage of this site is approximately 21,500 square feet. Since the Park Service intends to limit the footprint of Georgetown University's boathouse in any event to no more than 15,000 square feet, there is obviously more than ample space at this site to accommodate all of the university's needs associated with its rowing program, including an interior rowing tank.

There are many advantages for locating Georgetown University's boathouse at Site D. This site is within the non-motorized boathouse zone, but outside the C & O Canal NHP. This site would not adversely impact the historic and scenic features of the C & O Canal. Because this location is essentially beneath the Whitehurst Freeway, there would be no height restrictions on the boathouse at this site. Since the site fronts on Water Street there are no safety concerns from pedestrian congestion. Also, it is easily accessible with no requirement for a vehicular turn-around. Importantly, Site D poses no environmental concerns. Finally, if Georgetown University is to secure a boathouse on the Potomac River, this location is the last available site for that purpose.

CONCERN STATEMENT: (Concern ID: 54110) Commenters questioned how the National Park Service would accommodate safe equipment and boat storage for the Washington Canoe Club and suggested that the historical Washington Canoe Club building should be restored and integrated into the proposal. The same commenters suggested that the issue of legal ownership should be promptly determined and a cost estimate for the restoration should be established. One commenter suggested that Sites A, B, and C be treated as a single location within which the Washington Canoe Club boathouse could be repositioned.

Representative Quote(s):

Corr. ID: 28 **Organization:** *Not Specified* **Comment ID:** 413323 **Organization Type:** Unaffiliated Individual

Representative Quote: Site B. The historic Washington Canoe Club building should be restored. The issue of the legal ownership of this structure should be promptly ascertained and a cost estimate for its' restoration should be established.

Corr. ID: 138 **Organization:** C&O Canal Association **Comment ID:** 413047 **Organization Type:** Unaffiliated Individual

Representative Quote: 3. Restore the Washington Canoe Club. Before any construction of a new boathouse, there should be a resolution of the legal status of the Washington Canoe Club property, a restoration of the historic boathouse, and full utilization of this existing structure.

Corr. ID: 143 **Organization:** Washington Canoe Club **Comment ID:** 413340 **Organization Type:** Recreational Groups

Representative Quote: - None of the alternatives depict any security measures, such as fencing, for WCC members to store boats. Having safe places to store racing canoes and kayaks that can cost several thousand dollars is critically important to WCC members. Even a rehabilitated WCC clubhouse will not have adequate indoor storage capacity for members' boats.

Corr. ID: 143 **Organization:** Washington Canoe Club **Comment ID:** 413339 **Organization Type:** Recreational Groups

Representative Quote: - How does NPS propose to accommodate boat storage and equipment so essential to having a vital canoe and kayak program at WCC?

Corr. ID: 143 **Organization:** Washington Canoe Club **Comment ID:** 413338 **Organization Type:** Recreational Groups

Representative Quote: Based on existing information, we want to have further discussion with NPS on the following topics:

- Alternatives 1, 2, and 3 recognize the WCC building and dock. None depict areas surrounding the building that the club uses to store member and Club canoes, kayaks, paddleboards, or other equipment, or parking areas currently used by members. NPS needs to recognize both that WCC has grown over the last hundred years (requiring additional storage space for not only canoes and kayaks but also a substantial number of stand-up paddle boards: SUPs), and that WCC programs have evolved along with paddling sports so that we now utilize boats that can not fit inside the WCC clubhouse (our 6-person outrigger canoes). The motorboats that our coaches use to train racers and transport race officials also need storage space.

Corr. ID: 154 **Organization:** Friends of Georgetown Waterfront Park **Comment ID:** 413336
Organization Type: Recreational Groups

Representative Quote: FOGWP urges special attention to treating Sites A, Band C collectively as a single location within which the Washington Canoe Club boathouse could be repositioned slightly, subject to historic preservation standards as described in the Coalition comments in order to permit construction of a university boathouse.

Corr. ID: 158 **Organization:** *Not Specified* **Comment ID:** 413355 **Organization Type:** Unaffiliated Individual

Representative Quote: Alternatives 1, 2, and 3 recognize the WCC building and dock. None depict areas surrounding the building that the club uses to store member and Club canoes, kayaks, paddleboards, or other equipment or parking areas currently used by members. How does NPS propose to accommodate boat storage and equipment so essential to having a vital canoe and kayak program at WCC?

Corr. ID: 160 **Organization:** *Not Specified* **Comment ID:** 413375 **Organization Type:** Unaffiliated Individual

Representative Quote: Washington Canoe Club - As an architectural icon on the waterfront, the WCC clubhouse and club members have an important role to play in maintaining the sense of history and tradition that are so important to the Georgetown waterfront. The Development Plan needs to explicitly address the importance of this connection to earlier times and NPS needs to make extraordinary efforts to insure both the preservation of the building (by resolving the ownership issue and with a long-term lease and assistance on historic preservation, etc.) and the viability of its continued traditional use (which includes provision of adequate outdoor storage facilities and security for the club). A fence will be necessary.

CONCERN STATEMENT: (Concern ID: 54111) One commenter suggested that the EA needs to describe the processes that the National Park Service expects to use when implementing this plan, including the ownership and leasing of the structures, and the funding sources for construction.

Representative Quote(s):

Corr. ID: 143 **Organization:** Washington Canoe Club **Comment ID:** 413345 **Organization Type:** Recreational Groups

Representative Quote: - The plan mentions the possibility of two or three new boat houses without providing much detail about who might build them, how NPS would select among competing groups, who would manage/operate them, public access to them, etc. What model does NPS have for these - something like the publicly-owned and concessionaire-operated Thompson's Boat House or more in line with the Potomac Boat Club and WCC where public access is restricted? It's not clear whether NPS expects to build the facilities and lease them or rely on privately-funded entities to build them. Based on our experience in working with NPS, clarifying the relationship between NPS and private entities is fraught with complexities. The draft environmental assessment (EA) must describe the processes NPS expects to use when implementing this plan. Without a reasonable process for implementing a plan, it is likely to sit on shelves and gather dust. NPS needs to take time to discuss these procedural matters with potential boat house funders and operators prior to putting a plan in place.

CONCERN STATEMENT: (Concern ID: 54112) Several commenters requested that the National Park Service develop alternatives that address nonmotorized boathouse needs that are realistic and achievable in the near term. Commenters noted three issues that would limit or delay construction of the boathouses and suggested that none of the proposed alternatives are achievable in a timely manner as a result:

1. DC Zoning Regulations only allow for 1.0 Floor area ratio (FAR) for boathouses in the area and require minimum setbacks from the water, Key Bridge, the Whitehurst Freeway, the Aqueduct Bridge, and the C&O Canal.
2. The bicycle trail shown on the alternative designs may create new site access problems for Sites D and E.
3. DC Water intends to construct a deep underground storage tunnel to capture storm water and prevent combined sewer overflows on Site C.

One commenter suggested increasing accessibility at Site C and constructing a finger pier for nonmotorized boaters could be accomplished immediately without conflicting with any of the other changes that the National Park Service is considering.

Representative Quote(s):

Corr. ID: 20 **Organization:** Not Specified **Comment ID:** 412925 **Organization Type:** Unaffiliated Individual

Representative Quote: There is a single way to improve the public's access to the river than can be accomplished at minimal cost and with the highest benefit / cost ratio. The number of paddlers who prefer to use their own equipment in this area has greatly increased in recent years. Now they can either pay a fee to launch at the very congested dock of the canoe/kayak concession or carry everything to Site C with its uneven banks and random riprap. Site C could be easily graded to make it more accessible and

safer for paddlers. The addition of a finger pier would also be very helpful. This could all be done right away without conflicting with any of the other changes that the NPS is considering. So why wait?

Corr. ID: 156 Organization: Potomac River Access Coalition **Comment ID: 413348 Organization Type:** Recreational Groups

Representative Quote: We believe, therefore, that, in finalizing the environmental assessment, the National Park Service needs to evaluate development alternatives that both (1) address non-motorized boathouse needs and (2) are realistic and achievable in the near term even if it means adjusting site boundaries and locations to permit those constraints to be addressed.

For example, two issues further limit the construction of boathouses of the sizes envisioned in the alternatives in the NPS scoping documents (with footprints of 10,000 square feet on Site C, 7,800 square feet on Site D, and 13,800 square feet on Site E):

" The first applies to all three proposed sites in Alternative 1 (Sites C, D and E) and to the two sites in Alternatives 2 and 3 (Sites D and E). The DC Zoning Regulations only allow 1.0 FAR for boathouses in the area, in contrast to the 1.8 FAR that was referenced in the earlier Feasibility Study and seems to be carried forward in the recently proposed alternatives. Additional existing constraints, such as minimum setbacks from the water, Key Bridge, the Whitehurst Freeway, the Aqueduct Bridge, and the C & O Canal, will affect facility size and placement. Finally, the configuration of the bicycle trail shown on High, Medium and Low Density designs may create new site access problems for sites D and E. We recommend NPS realign the bicycle route to the north or Canal side of Water Street to 34th Street where it would cross over to connect to the existing path in the Georgetown Waterfront Park.

" The second issue relates to Site C. DC Water is required by Consent Decree between the District of Columbia and the US Environmental Protection Agency to construct a deep underground storage tunnel to capture storm water and prevent combined sewer overflows. Its current plans call for an access shaft to the future deep tunnel at Site C. DC Water is petitioning the Court to allow a shorter tunnel in exchange for green infrastructure improvements that would divert storm water from the current combined system. However, even if it is successful, DC Water has made clear that, regardless of the extent of the envisioned new tunnel, there will be a large surface access point at Site C for existing sewer lines. Site C appears, due to these constraints, to be less practicable as currently configured in the NPS draft Alternatives.

Corr. ID: 173 Organization: rower at Rock Creek Rowing, using TBC **Comment ID: 413319 Organization Type:** Unaffiliated Individual

Representative Quote: 1. Since Site C has serious construction limitations due to the needs of DC Water access, I support reconfiguring the delineation of sites A, B and C.

CONCERN STATEMENT: (Concern ID: 54114) One commenter questioned how the National Park Service planned to continue providing the services and facilities currently offered at the Key Bridge Boat dock and suggested that the rental centers need to be a key part of any alternative.

Representative Quote(s):

Corr. ID: 137 Organization: Chesapeake Paddlers Association, Inc. **Comment ID: 413313 Organization Type:** Recreational Groups

Representative Quote: Few if any of our members use a boathouse for boat storage, and those that do, along with the general public, could easily be accommodated at a kayak rental concession, as shown on Alternative 1. There are existing storage facilities at the Key Bridge Boat House available for rent to the general public. If this or another operation could be incorporated into the new plans, as shown in Alternative 1, possibly with more space, the general public could easily be served. In addition, the concessionaire would be responsible for the upkeep and security of their facility, reducing the cost to the NPS. Given the popularity of the existing rental concession with people who do not or cannot, for various

reasons, own their own boat, we feel that the inclusion of a rental facility would be highly desirable and would likely better meet the needs of more of the general public, than the seemingly excessive boat storage.

Corr. ID: 158 **Organization:** *Not Specified* **Comment ID:** 413360 **Organization Type:** Unaffiliated Individual

Representative Quote: - The Key Bridge Boat dock (formerly Jack's Boat House) provides valuable opportunities for the general public to rent water craft. Having a similar facility is important to enhancing recreational use of the Potomac. The materials distributed at the February 4 meeting did not show the Key Bridge Boat facility in any alternative except the No Action. How does NPS plan to continue the unique services the facility provides?

Corr. ID: 160 **Organization:** *Not Specified* **Comment ID:** 413372 **Organization Type:** Unaffiliated Individual

Representative Quote: Key Bridge Boats - The flier on the NMBZ development plan seems to pay little attention to the importance of a public boathouse for rentals of canoes, kayaks, and stand-up paddleboards. This function is a critical part of the Georgetown Waterfront and needs much greater attention as thousands of people get to enjoy the river each year with this service. Rentals are proposed as part of Alt 1, but seem to be dropped in Alt 2 and 3. A substantial and accessible rental center, preferably much closer to the center of things than Site A (so, above or below Key Bridge), needs to be a key part of any selected alternative.

CONCERN STATEMENT: (Concern ID: 54115) One commenter suggested that the development plan should include a discussion of the needs, facilities, and programming the C&O Canal National Historical Park and Rock Creek Park want to have within the nonmotorized boathouse zone to better coordinate and partner with other organizations to provide education, interpretation, historical preservation, and events.

Representative Quote(s):

Corr. ID: 160 **Organization:** *Not Specified* **Comment ID:** 413370 **Organization Type:** Unaffiliated Individual

Representative Quote: NPS activity - The Development Plan needs to include a section on what needs, facilities, and programming the C&O Canal NHP and Rock Creek Park seek to have within the NMBZ. Surely this is an opportunity for those park units, through creative partnerships, to expand their presence and their service to the public through programming and stewardship of resources, at minimal cost. The Gtown BID and the WCC, among others, have already been exploring ways that the club and NPS can partner on education, interpretation, historic preservation, and events for wounded warriors and youth.

AL1200 - ALTERNATIVE 1 - HIGH DENSITY

CONCERN STATEMENT: (Concern ID: 54116) Commenters were concerned that a boathouse at Site C would cause congestion at the entrance to the CCT and would create safety issues for pedestrians, joggers, and cyclists.

Representative Quote(s):

Corr. ID: 111 **Organization:** Coalition for the Capital Crescent Trail **Comment ID:** 413117
Organization Type: Conservation/Preservation

Representative Quote: 3) Regarding "Alternative 1 - High Density", we are concerned that the previous design problems for Site A may be repeated at Site C, also located inside the C&ONHP, between the

Washington Canoe Club (WCC) and the Aqueduct Bridge structure. That boathouse is shown with a nominal footprint of 10,000 sf (60' X 170'), which appears too big for the land available at that site without compromising the functioning of the CCT.

Corr. ID: 172 **Organization:** *Not Specified* **Comment ID:** 413043 **Organization Type:** Unaffiliated Individual

Representative Quote: Besides opposing intrusion into and degradation of a national park for exclusive private use (a Georgetown University boathouse), I am concerned about the safety of the pedestrians, joggers and cycling commuters for whom the Capital Crescent Trail (CCT) is a vital transportation and recreational passage. An enormous boathouse at Site C would crowd access at the entrance to the CCT, not to speak of the chaos and congestion its protracted construction would entail.

CONCERN STATEMENT: (Concern ID: 54117) One commenter suggested that Alternative 1 may not be the preferred alternative because it creates a dense environment of docks, does not address access to the boathouse at Site C, and relies on Site C for the boathouse, which may be problematic given the potential use of land as an access point for the interceptor tunnel. The commenter further suggested revisiting Site A as the location for the boathouse.

Representative Quote(s):

Corr. ID: 167 **Organization:** The Potomac Boat Club **Comment ID:** 413280 **Organization Type:** Recreational Groups

Representative Quote: Alternative 1- High Density. We support Alternative 1 (High Density), but note that it may not be the most preferable of Alternatives 1, 2 and 3, as currently configured, for the following reasons: First, it creates a very dense environment of docks on the water; second, it relies on usage of Site C for a boathouse, which we believe is very problematic given the needs of DC Water and its potential use of the land as an access point for its new interceptor tunnel; and third, it does not address the access issues of Potomac Boat Club (as noted above), nor does it meaningfully address access to the Site C boathouse. Two modifications we would suggest considering are (1) moving the wee entirely or partially onto Site A and using Site B as a boathouse location (in lieu of Site C), or (2) revisiting Site A as a boathouse location with Georgetown University being the primary user. Georgetown student rowers would likely access that site on foot or bike, avoiding the addition of more vehicular traffic on upper Water Street and into the C&O Canal Park area.

CONCERN STATEMENT: (Concern ID: 54118) Commenters suggested that Alternative 1 is inconsistent with the park's intentions to respect the historic character, natural resources, and existing recreation use of the C&O Canal because the construction associated with Alternative 1 would alter the character of the area, degrade its scenic quality, and lower its environmental value. The commenters were especially concerned with the lack of a height restriction on the proposed construction for Site C, because it could obstruct existing physical features (the towpath, Washington Canoe Club, or the aqueduct remains).

Representative Quote(s):

Corr. ID: 111 **Organization:** Coalition for the Capital Crescent Trail **Comment ID:** 425590
Organization Type: Conservation/Preservation

Representative Quote: 4) Further, given that height restriction is not addressed in the proposal, we are concerned about the potential for a structure being proposed for Site C rising above the existing physical features (WCC, Towpath, Aqueduct remains).

Corr. ID: 127 **Organization:** *Not Specified* **Comment ID:** 413131 **Organization Type:** Unaffiliated Individual

Representative Quote: The National Park Service presentation on February 4 declared that the development plan intends to respect "the historic character, natural resources, and existing recreational

use" of the C&O canal park. It is important to point out, however, that development plan's preliminary High Density Alternative is inconsistent with those declared limitations.

That High Density Alternative calls for establishment at Site C within the canal park of a 10,000 square foot boathouse with no height limitation. The boathouse complex would include a 250 foot dock and a large apron immediately adjacent to the historic Alexandria Aqueduct. Such construction would completely alter the character of this area, which lies just inside a popular entrance point to the National Historical Park. It would degrade its scenic quality and environmental value, and would transform the existing recreational use of the area, particularly if used for academic team rowing.

CONCERN STATEMENT: (Concern ID: 54119) Commenters noted that the C&O Canal exists to benefit the public and no part of it should be considered for a land exchange to enhance private use.

Representative Quote(s):

Corr. ID: 31 Organization: Defenders of Potomac River Parkland **Comment ID: 425717 Organization Type:** Conservation/Preservation

Representative Quote: 10. If NPS considers land swaps, conduct the process transparently and with public accountability, including making public the valuations used for the swaps.

Corr. ID: 105 Organization: *Not Specified* **Comment ID: 413317 Organization Type:** Unaffiliated Individual

Representative Quote: LAND EXCHANGE AND LEASING: The project newsletter notes that the High Density Alternative "leverages land exchanges or long-term leases to allow universities to develop facilities." In my view, it might be beneficial for NPS to exchange some of its degraded urban land east of the Aqueduct Bridge for Georgetown University's upriver plot along the Potomac, provided the terms were equitable. It would be totally unacceptable, however, to trade away Site C. The C&O Canal NHP's authority to engage in land exchange is intended as a tool to enhance the park, not to create a private enclave within it.

Corr. ID: 127 Organization: *Not Specified* **Comment ID: 425589 Organization Type:** Unaffiliated Individual

Representative Quote: The High Density Alternative also permits land exchanges to allow development by universities. If applied to Site C, such an exchange would be a misuse of the National Historical Park's authority to engage in land exchange, which is intended to enhance the park. The canal park exists to benefit the public, and no part of it should be converted to private use.

Corr. ID: 142 Organization: Former member of the Federal C&O Canal NHP Commission **Comment ID: 413055 Organization Type:** Unaffiliated Individual

Representative Quote: It is important to consider the C&O Canal NPS is a park that belongs to the public and should not be exclusively for private use under any circumstances. The land exchange that was brokered many years ago was probably politically motivated and did not have the best and highest interest of the C&O Canal NHP park in mind.

Corr. ID: 166 Organization: *Not Specified* **Comment ID: 425718 Organization Type:** Unaffiliated Individual

Representative Quote: 5.Land swap:

If any land swaps are considered, whether there are credible economic, societal, technical, or environmental reasons for taxpayers to relinquish ownership of land that may be historically significant, economically valuable, and urban green space that gets heavy public use, in favor of a less valuable plot of land elsewhere.

An appraisal of the respective values is prepared in a transparent, publicly accessible manner.

CONCERN STATEMENT: (Concern ID: 54120) One commenter suggested that the storage facility proposed for Site A under the High Density Alternative would add traffic to a stretch of the CCT and would interfere with the structure of the canal berm. Additionally, the commenter noted that the view of the Potomac and Site C's ability to filter rainwater runoff would be negatively impacted by the High Density Alternative.

Representative Quote(s):

Corr. ID: 105 **Organization:** *Not Specified* **Comment ID:** 413315 **Organization Type:** Unaffiliated Individual

Representative Quote: SITE A: NPS is to be congratulated for excluding the earlier proposal for a large boathouse at Site A from the current preliminary plan. One of the many of the flaws of that concept was the poor access to that site, a point noted by one of the NPS planning consultants at the February 4 open house. To a significant degree, that same objection applies to the storage facility proposed for Site A under High Density. Maintaining the facility and moving boats to and from it would add traffic to a stretch of the Capital Crescent Trail that is often crowded by hikers and bikers - and likely to become more so. A storage facility of the size and location indicated on the newsletter map would also involve interference with the structure of the canal berm.

Corr. ID: 105 **Organization:** *Not Specified* **Comment ID:** 413316 **Organization Type:** Unaffiliated Individual

Representative Quote: SITE C: An open space with a fringe of trees, Site C helps to filter rainwater runoff and provides an attractive view of the Potomac for park visitors relaxing by the river or moving along the Capital Crescent Trail. These benefits would not be harmed by creating paddle craft access here, provided the scale and design were appropriate. Under the High Density Alternative, however, such values would be largely destroyed by intense development, and by the traffic that it would bring. Nearly all of the open space west of the Aqueduct Bridge would be occupied by: a boathouse larger than the Washington Canoe Club, with no apparent height restriction; a paved apron; and a roadway parallel to the Trail. A development that even approached such a scale would be wholly inconsistent with the planning project's stated aim to respect "the historic character, natural resources, and existing recreational use" of the C&O Canal NHP. A boathouse complex of that nature would almost certainly be intended for academic team rowing, which would replace the existing recreational use of the site with a new one. Site C would be transformed, and its environmental and scenic benefits virtually erased.

AL2200 - ALTERNATIVE 2 - MEDIUM DENSITY

CONCERN STATEMENT: (Concern ID: 54121) One commenter indicated that a method needs to be proposed to prevent or discourage non-paddlers from using parking provided for paddlers provided under Alternative 2.

Representative Quote(s):

Corr. ID: 6 **Organization:** *Not Specified* **Comment ID:** 412908 **Organization Type:** Unaffiliated Individual

Representative Quote: In regard to the proposed alternatives, all three look acceptable however, I would be more inclined to go with Alternative 2 - Medium Density. I believe the sport will continue to grow and if more access is provided, it will continue to blossom. My primary concern is with parking. At this time, all available parking along Water Street is taken everyday by commuters seeking free parking. If parking is provided for paddlers, there needs to be a method to prevent or discourage non-paddlers from using the limited parking spaces.

CONCERN STATEMENT: (Concern ID: 54122) Commenters made the following recommendations regarding Alternative 2:

- The rental facility at Site C should be moved to Site A, or a drop-off location to Site A should be added.
- A second canoe/kayak launching location upriver from the Washington Canoe Club is an unnecessary intrusion into a wooded area.
- The car drop-off area will likely cause congestion issues, crowd the narrow access points to C&O Canal, and cause negative car-bike interactions.
- Locating the canoe/kayak facility upstream of the rowing facilities may result in safer situations.

One commenter approved of Alternative 2 because the site provided a drop-off point and car top beach at Site C.

Representative Quote(s):

Corr. ID: 58 Organization: *Not Specified* **Comment ID:** 413213 **Organization Type:** Unaffiliated Individual

Representative Quote: Alternative 2 is a better choice, as it provides a cartop beach at Site C between the PBC and WCC, including a dropoff point. This launch would be of great value to the paddling community, provided that public access is truly supported there rather than the beach and pier being restricted by the co-located rental concession shown on the diagram. The second canoe/kayak launch at Site A seems ill sited, however, as it has no vehicle access by land and so there is no opportunity for paddler to drop off their craft. I believe it would be better to move the rental facility to Site A and leave Site C for public use.

Corr. ID: 127 Organization: *Not Specified* **Comment ID:** 413133 **Organization Type:** Unaffiliated Individual

Representative Quote: The Medium Density Alternative's plan for a storage facility and a car drop-off area has will crowd the narrow access point to the canal park, and should be dropped from the plan. The same Alternative's inclusion of a second canoe/kayak launching area upriver from the Washington Canoe Club seems an unnecessary intrusion in a wooded area where the nature trail proposed under the Low Density Alternative would be more appropriate.

Corr. ID: 167 Organization: The Potomac Boat Club **Comment ID:** 413281 **Organization Type:** Recreational Groups

Representative Quote: Alternative 2 - Medium Density

We support this alternative, subject to the access and bike lane issues described above, and believe it is the best alternative, as currently depicted. We note that the cartop dropoff area would create the same issues that resulted in the current gates being built under the Aqueduct, and that bike/car interactions would have to be solved. We believe the locations of aprons between, and separating, boathouses are a very useful idea, and would make moving and loading boats more feasible. We also note that canoe/kayak facility being above the rowing facilities may result in a safer and more appropriate location, so as to help divide the two different types of river traffic and avoid collisions between novice kayakers and stand-up paddle boarders, who often are just visiting D.C., and rowing shells that have limited forward visibility.

CONCERN STATEMENT: (Concern ID: 54124) Commenters felt that increasing the volume of craft on the water would increase safety risks, especially for inexperienced or casual nonmotorized craft-users.

Representative Quote(s):

Corr. ID: 58 Organization: *Not Specified* **Comment ID:** 425588 **Organization Type:** Unaffiliated Individual

Representative Quote: Recognizing that more rowing capacity is a goal of the plan, Alternative 2 with the modifications I describe could be viable. However, this alternative would provide a density of craft in

the area which could prove dangerous as casual canoeists and paddle boarders are forced to mix with large, powerful rowing shells.

Corr. ID: 117 **Organization:** *Not Specified* **Comment ID:** 413127 **Organization Type:** Unaffiliated Individual

Representative Quote: Dramatically increasing the volume of traffic via either alternative 1 or 2 would present a significant safety risk by increasing congestion and traffic by largely inexperienced users (people who rent equipment occasionally vs own and operate their own). These users are generally unfamiliar with rules of navigation and are typically distracted when sight seeing or exercising. I have actually been hit by a two person crew boat while I was at anchor - the occupants claimed they "didn't see" my 42' boat. Fortunately no one was injured, but there was nearly \$800 damage to my vessel.

AL3200 - ALTERNATIVE 3 - LOW DENSITY

CONCERN STATEMENT: (Concern ID: 54125) Commenters supported Alternative 3 because it would have fewer impacts on the environment. However, another commenter suggested that a car top drop-off point be included in the alternative because the public would not be able to use the access point without vehicular access.

Representative Quote(s):

Corr. ID: 58 **Organization:** *Not Specified* **Comment ID:** 413214 **Organization Type:** Unaffiliated Individual

Representative Quote: Alternative 3 would be viable with small modifications. Again, paddlers providing their own boats and/or SUPs need a place to to drop off and load. If Alternative 3 is adopted I would recommend adding the cartop dropoff apron shown at Site C in Alternative 2.

Overall, my preferred recommendation is Alternative 3 with the modifications described above.

Corr. ID: 177 **Organization:** Surfrider Foundation - DC Chapter **Comment ID:** 413034 **Organization Type:** Conservation/Preservation

Representative Quote: Based on these concerns, we write to express our support of Alternative 3 - the Low Impact Alternative that positions new boathouse facilities and a new public access point downriver of WCC. This plan will put the least amount of the strain on the environment, while opening up the area for the enjoyment of more non-motorized boaters. we highly encourage NPS to include a Cartop Drop off (similar to the one depicted in Alternative 2) in this plan. As we discussed above, the public will not be able to use the access point without this crucial vehicular access.

CONCERN STATEMENT: (Concern ID: 54126) One commenter suggested that Alternative 3 should approach each recreational use (kayaking, canoeing, paddle boarding, etc.) through individual optimization, and create facilities based on what would be most optimal for that recreational use.

Representative Quote(s):

Corr. ID: 167 **Organization:** The Potomac Boat Club **Comment ID:** 413282 **Organization Type:** Recreational Groups

Representative Quote: Alternative 3 - Low Density.

We support this alternative, but believe it is the least preferable of the three alternatives that advocate boathouse development. The access and bike issues addressed above are again noted, but this alternative

is the least efficient at creating new boathouse space (one facility in total), and instead significantly increases kayak/canoe access. Compared to Alternative 2, which seems to optimize locations for boathouses, aprons and kayaks/canoes and drop off areas for the same, this alternative creates one combined facility, which is less than ideal, and essentially 'mashes' the uses together. We believe that the uses are better approached through individual optimization (and we believe kayakers/canoers would agree with this), and thus would suggest that Alternative 2 is the better approach overall.

CONCERN STATEMENT: (Concern ID: 54127) One commenter suggested that nonmotorized traffic is already substantial from Roosevelt Island to Fletchers Boat House and presents navigational issues to power boaters.

Representative Quote(s):

Corr. ID: 117 **Organization:** *Not Specified* **Comment ID:** 413126 **Organization Type:** Unaffiliated Individual

Representative Quote: I recommend implementing the Low Density alternate 3 approach. I travel past Key Bridge and Three Sisters Islands at slow speed on a regular basis using a power boat. Non-motorized vehicular traffic is already significant from Roosevelt Island north to Fletchers Boat House and presents a substantial navigation challenge due to their lack of mobility combined with natural obstacles (Key Bridge and Three Sisters) and the necessity of remaining under power to maintain steerage of the vessel.

AL4000 - ALTERNATIVES: NEW ALTERNATIVES OR ELEMENTS

CONCERN STATEMENT: (Concern ID: 54129) One commenter requested that the National Park Service consider adding 15-minute parking spaces close to the canoe/kayak launch to help with the loading/unloading process, constructing a short path to the C&O Canal, and adding a floating dock onto the canal itself for small boat launches.

Representative Quote(s):

Corr. ID: 8 **Organization:** *Not Specified* **Comment ID:** 412911 **Organization Type:** Unaffiliated Individual

Representative Quote: As a kayaker, the Georgetown area is grossly underserved. I was pleased to see each alternative includes at least one canoe/kayak launch area. However, there should be one or two 15 minute parking spaces closest to the canoe/kayak launch to help folks load and unload. Also, would it be possible to add a short path up to the C&O Canal and add a small floating dock on the canal itself for small boat launches? Increasing access to that park asset should be part of this project since the two launch sites are so close.

CONCERN STATEMENT: (Concern ID: 54130) Commenters made the following recommendations regarding Site D:

- Minimize non-permeable pavement by increasing green area.
- Connect and integrate the area east of the boathouses into Georgetown Waterfront Park.
- Establish car top launch/loading areas on the east side of the Alexandria Aqueduct to emphasize the threshold between urban and wilderness area.
- Provide river access along the private Potomac Boat Club.

Representative Quote(s):

Corr. ID: 189 **Organization:** National Capital Planning Commission **Comment ID:** 421767
Organization Type: Federal Government

Representative Quote: Site D: NCPC staff recommends to provide continuous river access along the private Potomac Boat Club through a promenade to ensure equitable access to the river, and to use easements, donations, purchases, exchanges, or other means to acquire land and enhance parks and open space along the waterfront. Staff recommends to use a different pavement treatment along the plaza to define the end of Water Street, NW and emphasize the threshold between urban and wilderness area. The plaza/Apron area can be used as a staging area for regattas, other boating events, and a bus drop-off area.

Corr. ID: 189 **Organization:** National Capital Planning Commission **Comment ID:** 421770

Organization Type: Federal Government

Representative Quote: Site D: Staff encourages NPS to maximize green open areas to the east of the proposed boathouse, rather than providing a paved area as shown in alternative 2. In addition, staff encourages NPS to explore how the area to the east of the proposed boathouse could be connected and integrated into Georgetown Waterfront Park.

In general, staff also recommends that the number of car top launch /temporary loading areas be minimized and located on the east side of the Alexandria Aqueduct in order to maintain the unique identity between natural scenic area to the west and urban area to the east side of the Aqueduct as described in the 1987 Master Plan.

CONCERN STATEMENT: (Concern ID: 54131) Commenters suggested that the supporting facilities should be constructed or improved, specifically the following:

- Improving the storage area under the aqueduct arch at Site C and limiting paving. One commenter suggested that if paving occurs, permeable pavement should be used.
- Constructing bicycle-locking facilities for the public to reduce vehicular traffic.
- Constructing a launching/docking site that could accommodate smaller crafts at Three Sisters.
- Providing storage rental and a year-round public access point with no fee for launching privately-owned nonmotorized water craft.
- Providing a place to store small water craft that are not dinghies, skiffs, dories, wherries, kayaks, canoes, or paddle boards.
- Providing a seasonally rentable locker space that could hold a paddle, life vest, and other equipment.

Representative Quote(s):

Corr. ID: 16 **Organization:** Chesapeake Paddlers Association **Comment ID:** 425714 **Organization Type:** Unaffiliated Individual

Representative Quote: One other point. If seasonally rentable rack space for boat owners is going to be part of the plan (I don't know if it is), you should also make available seasonally rentable locker space, large enough to hold a paddle, life vest, and miscellaneous other gear. If I could leave this gear safely by the boat, I could at least bike down the Capital Crescent trail to the boat and gear. Much as I would love to do that, right now I cannot. I have to drive there. And fight for parking, or pay for it a 1/4 mile away.

Corr. ID: 29 **Organization:** citizen **Comment ID:** 412936 **Organization Type:** Unaffiliated Individual

Representative Quote: 4. Bicycle locking facilities should be made available- -perhaps even a bike valet like at National Stadium. It will be important to separate pedestrian from biking lanes thru this area...in addition to vehicles. Vehicular traffic should be minimized. Since you have a deadend, you will need to accommodate turnaround traffic, unless you have controlled access.

Corr. ID: 187 **Organization:** District of Columbia Office of Planning **Comment ID:** 421511
Organization Type: State Government

Representative Quote: We would encourage the employment of permeable paving, as well as the limitation of paving where it may be expanded, as for the apron on Site C in Alternative 1.

Corr. ID: 189 **Organization:** National Capital Planning Commission **Comment ID:** 421755
Organization Type: Federal Government

Representative Quote: Site C: NCPC staff supports the proposed public Canoe/Kayak launch, picnic area, and finger pier as shown in alternative 3, and recommends to improve the storage area under the Aqueduct arch.

CONCERN STATEMENT: (Concern ID: 54133) Commenters requested a launching/docking site that could accommodate smaller crafts at Three Sisters.

Representative Quote(s):

Corr. ID: 12 **Organization:** *Not Specified* **Comment ID:** 412916 **Organization Type:** Unaffiliated Individual

Representative Quote: We need year round, non-fee, public access to the river at this location for launching privately owned non-motorized craft such as canoes, kayak, paddle boards, sunfish sail-craft. Public storage rental for these craft would be greatly appreciated.

Corr. ID: 21 **Organization:** *Not Specified* **Comment ID:** 412926 **Organization Type:** Unaffiliated Individual

Representative Quote: We often anchor at Three Sisters and occasionally need to get provisions, water the dog, pickup/drop off passengers. Would be really great if you all could provide a place where those of us with small tenders could come ashore. The wall and dock at Georgetown are too big for us to scale and the shoreline is otherwise inhospitable on the DC side.

Corr. ID: 176 **Organization:** *Not Specified* **Comment ID:** 413036 **Organization Type:** Unaffiliated Individual

Representative Quote: 2. It would be great if there was a place to store small craft that are not canoes/kayaks/shells. Please consider private storage space that can handle rowboats. There is a large variety of rowing craft (dinghies, skiffs, dories, wherries, etc.) that are 12-19 ft. LOA with beams of 4-6 ft. This is a bit wider than a sit on top kayak, but shorter than a shell. There is no place around Washington to store this kind of boat. There are NPS facilities for motorboats, sailboats, kayaks and shells- -but nothing for a small rowboat.

CONCERN STATEMENT: (Concern ID: 54135) One commenter suggested that a single universal boathouse below Key Bridge could meet multiple needs and should be one of the alternatives proposed in the EA.

Representative Quote(s):

Corr. ID: 160 **Organization:** *Not Specified* **Comment ID:** 425710 **Organization Type:** Unaffiliated Individual

Representative Quote: Recommendation for boathouses - While Thompsons is far from perfect, it does demonstrate that a facility shared by a number of teams (university, high school) and also a boat rental business is feasible. One large universal boathouse below Key Bridge could meet multiple needs and should be one of the final alternatives proposed in the EA. NPS should be open to utilizing a small part of the existing Gtown Waterfront Park to adequately accommodate this universal boathouse.

CONCERN STATEMENT: (Concern ID: 54136) Commenters suggested that the historic Washington Canoe Club at Site B should be renovated and integrated into the proposal to ensure the shoreline of the Potomac River remains publicly accessible.

Representative Quote(s):

Corr. ID: 156 **Organization:** Potomac River Access Coalition **Comment ID:** 413350 **Organization Type:** Recreational Groups

Representative Quote: Given the serious limitations referenced above regarding Site C, the representatives of our Coalition have discussed the possibility of a proposal which would result in moving slightly upstream, stabilizing, and restoring, with private funds, the historic clubhouse of the Washington Canoe Club. This registered historic structure is currently in a state of disrepair and partial use by the Washington Canoe Club, which is undertaking a process to restore its clubhouse to structural integrity and full use. Of course, any plan to move the structure must comport with any restrictions imposed through its historic designation and must be sensitive to other concerns. For example, to the extent that the historic structure could be moved upstream onto a portion of Site A, the remainder of Site A could be restored to its natural habitat rather than developed in a manner contemplated by NPS Alternatives 1 and 2 for High and Medium Density development. As stated in the earlier 2006 Environmental Assessment, "[m]uch of the vegetation on the site (Site A) is not native", and undertaking habitat enhancement on the upstream (western) portion of Site A, by reinstating native trees and other vegetation, could improve wildlife habitat in the area. Such a plan, if recommended, could be far more beneficial in all respects than the High and Medium density development plans.

Corr. ID: 189 **Organization:** National Capital Planning Commission **Comment ID:** 421754 **Organization Type:** Federal Government

Representative Quote: Site B: NCPC staff recommends to renovate the historic Washington Canoe Club located in Site B, which is listed in the National Register of Historic Places, and integrate the building into the design to ensure that the shoreline of the Potomac River remains publicly accessible and that private boating clubs provide shoreline continuity through parks and promenades.

CONCERN STATEMENT: (Concern ID: 54138) One commenter requested that the National Park Service analyze different trail alignments, avoid traffic circulation conflicts, and Provide a safe and smooth transition at the intersection of Alexandria Aqueduct and Water Street NW.

Additionally, the commenter requested that the National Park Service consider the following regarding the CCT connection:

- Avoid sharp angles and diagonally crossing paths in the middle of street right-of-ways, specifically at the terminus of Water Street NW.
- Continue the trail alignment under Whitehurst Freeway and along the south side of Water Street NW to connect the existing trail to the western edge of Georgetown Waterfront Park.
- Explore the possibility of parallel parking along both sides of Water Street NW.
- Develop strategies to encourage the use of the existing parking garages on K Street NW.
- Install sidewalks along Water Street, from 34th Street to the Alexandria Aqueduct.
- Install way-finding specifically indicating that Water Street ends at the Alexandria Aqueduct.
- Install interpretive signage to highlight historical elements.
- Install signage that explains the "Rules of the River" as a guide for inexperienced paddlers.
- Improve the connection between the CCT and the C&O Canal Towpath.

Representative Quote(s):

Corr. ID: 189 **Organization:** National Capital Planning Commission **Comment ID:** 421750 **Organization Type:** Federal Government

Representative Quote: Capital Crescent Trail Connection

NCPC staff is supportive of improving the CCT connection to the western edge of the Georgetown Waterfront Park and separating bicycle, pedestrian and vehicular uses, as shown in all the alternatives; however, we request that NPS explore different trail alignments, avoid traffic circulation conflicts, and provide a smooth, clear and safe transition at the intersection of Alexandria Aqueduct and Water Street, NW. Staff recommends to explore the following regarding the CCT trail connection:

- Continue the trail parallel to the south edge of Water Street, NW, as shown in all the alternatives but avoid sharp angles and diagonal crossing in the middle of the street right-of-way, specifically at the terminus of Water Street, NW.
- Continue the trail alignment under the elevated Whitehurst Freeway support posts along the south side of Water Street, NW to connect to the existing trail at the western edge of Georgetown Waterfront Park.
- Coordinate with the District Department of Transportation (DDOT) regarding the following: removal of 90 degree parking along both sides of Water Street, NW and explore possibility of limited parallel parking; strategies to encourage the use of existing parking garages on K Street, NW; installation of sidewalks along the north and south side of Water Street, from 34th Street to the Alexandria Aqueduct; a wide sidewalk along the north side of Water Street may present opportunities for retail or cafe seating areas in the existing warehouses; study alternatives to relocate and integrate the existing Capital Bikeshare station at 34th and Water Street, NW into the new trail connection.
- Provide wayfinding signage indicating that Water Street, NW ends at the Alexandria Aqueduct, and clearly demarcate bicycle and vehicular lanes.
- Install interpretative signage to highlight historic elements such as the Washington Canoe Club, Potomac Boat Club, C&O Canal as well as the symbolic transition from city to nature by the arch of the historic Alexandria Aqueduct, and to guide inexperienced paddlers and rowers about the "rules of the river".
- Improve connection between the CCT and the C&O Canal Towpath which are parallel but are at different elevations. The C&O canal can be accessed using the stairs alongside Key Bridge and connects to Virginia trails.

CONCERN STATEMENT: (Concern ID: 54139) Commenters mentioned adding a new alternative to build one new boathouse at 34th Street that would be shared by the university, high school, and public programs. One commenter disapproved of the new alternatives because the National Park Service needs to honor its promise to exchange land with George Washington University, and noted that the issue of overcrowding could be resolved by having George Washington University and Georgetown University move into their own boathouses rather than building one new boathouse. The commenter noted that multiple boathouses or the creation of a "boathouse row" would increase the public's enjoyment of the area. One commenter approved of the new alternative because the commenter did not want a boathouse built in C&O Canal National Historical Park.

Representative Quote(s):

Corr. ID: 28 **Organization:** Not Specified **Comment ID:** 413326 **Organization Type:** Unaffiliated Individual

Representative Quote: Site E. I understand that George Washington University has been promised Site E, located between 34th Street and Key Bridge for its boathouse. To advance this claim, GW, in good faith, purchased two of the three townhouses (3524 and 3526 Water Street), the purpose of which was to convey these properties to the Park Service in exchange for Site E. The Park Service should honor this promise.

Corr. ID: 31 **Organization:** Defenders of Potomac River Parkland **Comment ID:** 413073 **Organization Type:** Conservation/Preservation

Representative Quote: 7. Include this new alternative: instead of multiple new boathouses, build only one new boathouse at 34th St., and share it with university, high school and public programs (like nearby Thompson's Boat Center). Use surrounding land for storage and launching needs.

Corr. ID: 172 **Organization:** Not Specified **Comment ID:** 413042 **Organization Type:** Unaffiliated Individual

Representative Quote: As a resident of WDC's Foggy Bottom, I wish to convey my opposition to construction of a massive boathouse in the C&O Canal National Historical Park, indicated at 'Site C' of the High Density Alternative of the Georgetown Nonmotorized Boathouse Zone Development Plan. I favor a suggestion by the Defenders of Potomac River Parkland: "7. Include this new alternative: instead of multiple new boathouses, build only one new boathouse at 34th St., and share it with university, high school and public programs (like nearby Thompson's Boat Center). Use surrounding land for storage and launching needs." Also from the Defenders: "Appropriate sites for construction of ample boating facilities exist on degraded land outside of the National Historical Park."

Corr. ID: 186 **Organization:** *Not Specified* **Comment ID:** 421509 **Organization Type:** Unaffiliated Individual

Representative Quote: With the exception of item 7, I am in complete agreement with the excellent scoping letter submitted by Defenders of Potomac River Parkland in connection with the development plan for the Georgetown Non-Motorized Boathouse Zone. Item 7 provides as an "alternative" to "multiple new boathouses, build only one new boathouse at 34th St., and share it with university, high school and public programs". The basis for my disagreement follows.

1. With respect to GW, a promise is a promise. GW, in good faith, purchased two of the three townhouses located in Site D solely for the purpose of swapping these properties for Site E. NPS should honor this promise. Also, GW would pay for the construction of its boathouse at Site E. In these circumstances, the taxpayers would not have to pay for the construction of "one new boathouse".
2. With respect to GU, I've recommended that the University be permitted to exchange its up-river parcel and its mile-long easement over the CCT for Site D. In my scoping statement I've explained the many advantages for locating GU's boathouse at Site D. In order to sweeten the deal, GU should consider buying the third townhouse in Site D as part of GU's exchange with NPS. I should also add that GU would pay for the construction of its boathouse at Site D, another plus.
3. While construction of "one new boathouse" would reduce the overcrowded conditions at the Thompson Boat Center, the same relief could be achieved by GW and GU vacating the TBC and moving into their own boathouses, but with no expense to the public of building "one new boathouse".
4. I've recommended that Key Bridge Boathouse be relocated from Site D to Site C. Since there is no "boathouse" but only a small "log cabin" office, relocation would be relatively easy. This kayak and canoe rental operation would have no detrimental impact on Site C. For example, this rental operation, including the "log cabin" office, would not block the view of the river from either the CCT or the C&O Canal towpath.
- And 5. From a urban planning point of view and the public's enjoyment of the Georgetown Waterfront Park, the creation of a "boathouse row" by clustering three boathouses around the commanding presence of Key Bridge would be a tour de force.

CONCERN STATEMENT: (Concern ID: 54140) Several commenters suggested constructing dinghy docks along Georgetown waterfront, preferably in the area down-river from Key Bridge. One commenter suggested that the 13,800-square-foot boathouse downriver from the Key Bridge should not be developed, and that a dock for dinghies be built instead.

Representative Quote(s):

Corr. ID: 102 **Organization:** Potomac River Yacht Clubs Association **Comment ID:** 413100
Organization Type: Unaffiliated Individual

Representative Quote: I would add a request to consider a small docking area for dinghy operators to come and go from the waterfront. While power boats would not be compatible with the non-motorized vessel concept, dinghies with small motors at a designated docking area would not cause problems for the non-motorized vessels, and this would allow people from power boats at anchor to access the waterfront, shuttle passengers to and from, etc.

Corr. ID: 108 **Organization:** *Not Specified* **Comment ID:** 413108 **Organization Type:** Unaffiliated Individual

Representative Quote: I request that a safe, public dinghy dock be included in the plans for additional boathouses. A safe, public dinghy dock would greatly benefit the boating community as a whole by protecting the shoreline from unauthorized or unsafe launches and landings, as well as ensure equal access for the everyone.

Corr. ID: 109 **Organization:** *Not Specified* **Comment ID:** 413109 **Organization Type:** Unaffiliated Individual

Representative Quote: There is a need for a dinghy dock at the Georgetown Wall. Currently, there is no safe way to dock a dinghy. This would increase boater traffic to the restaurants and shops.

Corr. ID: 128 **Organization:** *Not Specified* **Comment ID:** 413135 **Organization Type:** Unaffiliated Individual

Representative Quote: Safe Public Dinghy Dock: There are currently no plans to include a safe, dinghy dock.

There is currently no safe, public dinghy dock in the area. Docking at the Georgetown Wall is not safe for small dinghies. A safe, public dinghy dock would benefit the boating community as a whole. I'd like to request that a safe, public dinghy dock be included in the plans for additional boathouses.

Corr. ID: 183 **Organization:** Potomac River Yacht Clubs Association **Comment ID:** 421504
Organization Type: Recreational Groups

Representative Quote: Therefore, we propose an Alternative 4, a modification of low or medium density use. We suggest that the 13,800 sq. ft. boathouse downriver from the Key Bridge not be developed, and that a dock for dinghies be built instead.

Corr. ID: 183 **Organization:** Potomac River Yacht Clubs Association **Comment ID:** 421506
Organization Type: Recreational Groups

Representative Quote: The area down-river from Key Bridge could be developed to include dinghy docks, along with reduced facilities for other non-motorized craft. It would also have a walkway installed that connects to the Georgetown Waterfront Park and through that to the upriver end of the "Wall".

Corr. ID: 183 **Organization:** Potomac River Yacht Clubs Association **Comment ID:** 421503
Organization Type: Recreational Groups

Representative Quote: The Potomac River Yacht Clubs Association, which represents 21 sailing and power boat clubs in the District of Columbia and the Maryland and Virginia sides of the Potomac River, would like to go on record as agreeing with the need for facilities to support non-motorized water activities but opposed to the Georgetown Nonmotorized Boathouse Zone Development Plan as it is currently proposed in Alternatives 1, 2 and 3.

While the Association recognizes and agrees with the need for additional facilities to support non-motorized water activities, we are concerned that none of the three current alternatives takes into consideration the need for docking facilities for small dinghies, both rowed and powered.

CONCERN STATEMENT: (Concern ID: 54141) Commenters stated that an additional public access launching facility west of Key Bridge would only create parking shortages and safety issues for pedestrians on the CCT. The commenters suggested locating a public access point in West Potomac Park or Haines Point instead.

Representative Quote(s):

Corr. ID: 144 **Organization:** Anne Arundel County Water Trail Committee **Comment ID:** 413067
Organization Type: County Government

Representative Quote: Two alternatives would provide true public water access:

- 1) Put public parking on Site A, Site C, Site D and Site E rather than use public money and public land to build expensive boathouses and floating docks for private universities.
- 2) Do nothing with the Georgetown waterfront and instead use the public funds to provide public water access at a better location, such as Haines Point.

Corr. ID: 154 **Organization:** Friends of Georgetown Waterfront Park **Comment ID:** 413337
Organization Type: Recreational Groups

Representative Quote: Currently, Key Bridge Boathouse and TBC provide public access to the river for rowers and paddle board rentals. FOG WP favors exploration of locating a public access point in West Potomac Park for those seeking options for launching privately owned canoes, kayaks and row boats. There is abundant parking in that area. An additional public access launching facility west of Key Bridge would only complicate the shortage of parking at the end of Water Street, and create a safety issue for those runners, pedestrians and bikers operating on the Capital Crescent Trail.

CONCERN STATEMENT: (Concern ID: 54142) One commenter suggested that roller ramp systems and docks are not suitable for nonmotorized boat launching because ramps and docks can cause severe damage to hard-shelled boats, are vulnerable to flooding or ice damage, and are require ongoing costly maintenance.

Representative Quote(s):

Corr. ID: 137 **Organization:** Chesapeake Paddlers Association, Inc. **Comment ID:** 413312
Organization Type: Recreational Groups

Representative Quote: In general, a kayaker, canoeist, or stand up paddle boarder (SUP) requires only three things:

- A) easy access to the water,
- B) adequate parking, and
- C) some form of bathroom facilities, even if it is just a well maintained port-a-john.

We are pleased that a beach-like area has been built into the design, as was suggested in the past meetings. As long as there is a firm, preferably sandy, gently sloping bottom, and room enough to maneuver a nearly-twenty foot boat, that is all that is needed. It is the much the preferred way of launching a car top boat and very inexpensive to construct and maintain when compared to any sort of dock. We strongly advise against some of the roller ramp systems that have been installed in other locations, as many of these designs have been found to cause severe damage to hard-shelled boats constructed of fiberglass, Kevlar, or carbon fiber. In addition, ramps and docks are very vulnerable to damage due to flooding or ice and require more in ongoing maintenance costs.

Access to the water includes being able to drive to the put-in. Normal gear that accompanies the paddler can be bulky and heavy to tote easily as well. It is impractical to require that the boat and equipment to be carried any great distance to the launch site, although parking need not be at the launch site as long as the distance is reasonable (say 100 yards or less).

CONCERN STATEMENT: (Concern ID: 54143) One commenter noted that rental space for individual boats at Site E would likely be expensive and scarce and that Site E would be better suited for a beach landing or protected cove. The commenter also noted that no additional parking can be added to Site E and the limited 4-hour parking does not provide enough time for nonmotorized boat users to make a full boating trip, and that providing day passes would be a better idea. In addition, the commenter suggested that public bathrooms be

included in the design. Finally, the commenter noted that if a launching fee is incorporated, the public view of the National Park Service may diminish.

Representative Quote(s):

Corr. ID: 56 Organization: *Not Specified* **Comment ID:** 413201 **Organization Type:** Unaffiliated Individual

Representative Quote: 1. The boathouse and 300' dock in area E of each alternative seems like a poor use of prime space. I assume that mostly rowing sculls will be stored here and that any rental space for individual boats will be scarce, expensive, or both. Barring some insurmountable technical obstacle like major existing utilities or geologic instability, this seems like a much better place for a beach landing or protected cove. I think such an area would blend better with the existing waterfront park than a 230' long monolithic storage locker. I realize this area is currently bulkheaded, but we engineers can come up with some pretty clever solutions when we need to. If this could be accomplished, then I think most paddlers would be fine with the rest of any other option presented.

2. Given the narrowness of the site, I will presume there is no reasonable way to accommodate more parking. This is a major issue for anyone that gets to the area after 10am. The last time I was there, I could not find any meters that allowed for more than 4 hours of parking. Since it can easily take that long to gear up, launch, paddle to Little Falls and back; there seems to be no option for such a trip from this starting point. I don't know the feasibility of such a scheme, but would it be possible to make some parking spaces usable all day, perhaps if a permit was purchased from one of the concessionaire locations? At the very least, a three car loading/unloading zone for getting your boat onto and off of your car would be a great step forward.

3. Bathrooms. I'm sure most of the buildings presented in concept here will have them, but paddlers freak out when there is not a readily accessible (not locked) bathroom nearby. This seems to be a small design consideration, but I can assure you it is a major point that you will want to address with any group.

4. Fees. I'm not sure whether the Key Bridge Boathouse currently even allows non-rented craft to launch, but the former Jack's Boathouse charged \$10 for each launch. While only a few dollars more than many area reservoirs charge, a similar pricing scheme may easily sour many people on the idea of the NPS being effective stewards of our natural resources.

CONCERN STATEMENT: (Concern ID: 54144) One commenter stated adding facilities/amenities to the Georgetown Waterfront would cause overcrowding. The commenter suggested adding an access point to Fletcher's Boathouse to provide more room for those intending to use the river for recreational use.

Representative Quote(s):

Corr. ID: 34 Organization: WCC **Comment ID:** 413155 **Organization Type:** Unaffiliated Individual

Representative Quote: After reviewing the plans, my main concern is that making it more attractive to use the Georgetown waterfront will lure more people to an already overcrowded area. The park at the end of Wisconsin is very attractive and gets a lot of use, but adding to the numbers of people in this small area seems like poor planning. If there were a way to make the access to the Fletcher's Boathouse more available and safer for drivers, it would seem to be a better way to spread out the crowds who enjoy the river.

CONCERN STATEMENT: (Concern ID: 54145) Commenters suggested that the plan should provide a clearly marked lane or channel for motorized vessels to increase the safety of both nonmotorized and motorized boaters.

Representative Quote(s):

Corr. ID: 25 Organization: *Not Specified* **Comment ID:** 425675 **Organization Type:** Unaffiliated Individual

Representative Quote: Also would like to see that a clearly marked lane or channel be established for motorized vessels transiting through this area which excludes "lingering, anchored, or drifting" non-motorized boats.

Corr. ID: 41 Organization: Capital Yacht Club **Comment ID:** 412948 **Organization Type:** Unaffiliated Individual

Representative Quote: As the facilities for non-motorized vessels expand, it will be important to PROVIDE A CLEARLY MARKED LANE OR CHANNEL FOR MOTORIZED VESSELS transiting through this area, one which excludes "lingering, anchored, or drifting" non-motorized boats. The "motorized vessel channel" essentially comprises the white deep water area shown on NOAA navigational chart #12280.

Many of the persons in non-motorized vessels are renters, not owners, and as such may be totally unfamiliar with navigational buoyage systems. Already, some of these vessels are hazards to navigation to the motorized vessels as they wander into the deep water channel with little understanding of the danger they represent to themselves and to others.

THEREFORE, I BELIEVE IT WILL BE IMPORTANT TO PLACE NUMEROUS FLOATS WITH COLORFUL ROPES STRUNG BETWEEN THEM TO DELINEATE THE AREAS WITHIN WHICH THE NON-MOTORIZED VESSELS CAN SAFELY OPERATE.

GA1000 - IMPACT ANALYSIS: IMPACT ANALYSES

CONCERN STATEMENT: (Concern ID: 54147) Comments requested that the National Park Service consider the following factors:

- Whether the plan adequately addresses the increasing needs for boathouse training and storage facilities for the local universities, high schools, and recreational organizations
 - Whether the proposal sets a national precedent for establishing buildings for private and public use on public land previously designated for urban green space
 - The cumulative environmental, historical, social, economic, traffic, and safety impacts of all of the boathouses and facilities proposed in each alternative.
 - The potential for wetland destruction, erosion, or flooding due to construction, changes in hydrology, water pollution, or health of the floodplain, or the water quality of the river
 - Damage to the C&O Canal or other historic structures
 - The impacts of removing wildlife and vegetation from the along the river
 - Disturbance to any native, special status, or charismatic fish or wildlife species during implementation of the plan
 - Destruction of plants and plant diversity, especially native plants and trees.
 - A reduction in wildlife-related recreational activities, such as viewing animals and fishing
 - Threats to the scenic character of the riverbank, alterations to the viewshed, and the impact of nighttime lighting from the boathouses if the plan is implemented
 - The impact of increased river use and traffic on safety
 - Noise associated with construction activities, as well as the noise associated with rowing competitions (cheering, shouting, clapping, loading and unloading of boat trailers)
- Additionally, one commenter suggested that the US Army Corps of Engineers should conduct a hydrological study.

Representative Quote(s):

Corr. ID: 31 Organization: Defenders of Potomac River Parkland **Comment ID: 425716 Organization Type:** Conservation/Preservation

Representative Quote: 6. Address issues related to hydrologic and hydraulic impacts of proposed development, protection of wetlands, and stormwater management.

Corr. ID: 166 Organization: *Not Specified* **Comment ID: 413295 Organization Type:** Unaffiliated Individual

Representative Quote: 3. Removal of wildlife habitat along the riverbank:
The impact of removing vegetation in and along the river that provides habitat for fish, ducks, beaver, muskrat, herons, egrets, other birds, small mammals, and deer.
Whether there are native and/or unique species of fish and wildlife that would be disturbed.

Corr. ID: 166 Organization: *Not Specified* **Comment ID: 423488 Organization Type:** Unaffiliated Individual

Representative Quote: 2. Water pollution:
The effect of removal of additional riparian buffer between the C&O Canal and Potomac River in favor of pavement and other impermeable surfaces, and the resulting change in disposition of oils, chemicals, and drain overflows from the roads in the vicinity.
The potential for more surface algae and water surface vegetation due to changes in flow around the new buildings and docks.
The overall effect on river water quality.

Corr. ID: 166 Organization: *Not Specified* **Comment ID: 423494 Organization Type:** Unaffiliated Individual

Representative Quote: 8. Introduction of visual and audible elements that diminish the integrity of the national park setting and historic properties:
The change in view from both sides of the river and from the river itself. How the focus of park users' attention would change when the current pastoral setting of open green space is replaced with buildings, docks, and associated human activity.
The impact of night-time lighting of the buildings and potential interference with the view of the historic Washington, DC, monuments and memorials now clearly visible when lit up at night, from the Virginia side of the river.
The noise associated with construction and use (machinery, heavy trucks, cheering, shouting, and loading/unloading of boat trailers) in the national historical park and national park compared with the current state.
The proposed sizes of buildings in proportion to the sizes of the existing and previous historic structures, including the Washington Canoe Club, Potomac Boat Club, Key Bridge, and aqueduct.

Corr. ID: 166 Organization: *Not Specified* **Comment ID: 423491 Organization Type:** Unaffiliated Individual

Representative Quote: 5. Destruction of plants and plant diversity:
Whether there are native plant and tree varieties unique to the riverbank that would be disturbed.
Whether the desirable diversity of local plant and tree species would be threatened by the removal of vegetation.

Corr. ID: 166 Organization: *Not Specified* **Comment ID: 413294 Organization Type:** Unaffiliated Individual

Representative Quote: PHYSICAL, BIOLOGICAL, CULTURAL, RECREATIONAL, AND HISTORICAL ISSUES

1. Changes in hydrology, prospects for physical destruction and erosion, due to flooding:
The potential for destruction of permanent and/or intermittent wetlands and whether this is in accordance with national policy and permitting processes.

The current and future ability of the floodplain to absorb floodwaters and combined sewer overflow. The effect of the removal of riverside vegetation, which naturally slows and absorbs floodwaters, on floodwater speed and patterns.

The effect of squeezing floodwaters into a narrow corridor between new buildings and the George Washington Memorial Parkway on water speed, flow, and pattern, and potential damage to C&O Canal and other historic structures. A hydrologic study by the Corps of Engineers would be appropriate.

The effect of current and future floodwaters on riverbank and riverbed shape and silting characteristics. Mitigation measures for protecting the area's historic features and structures, all within the 100-year floodplain that the buildings are proposed to occupy, from changes in hydrology.

Corr. ID: 166 **Organization:** *Not Specified* **Comment ID:** 423495 **Organization Type:** Unaffiliated Individual

Representative Quote: 11. Historical significance of area:

Consideration of whether the intent of preserving the C&O corridor as a national historical park is consistent with the proposed alternatives.

The preferences of the public regarding preservation of such historical areas.

Corr. ID: 166 **Organization:** *Not Specified* **Comment ID:** 413296 **Organization Type:** Unaffiliated Individual

Representative Quote: 7. Change of the character of the historic property and national park setting:

The cumulative impact on the historical and cultural features of the C&O corridor, intended to be preserved by designation of a national historical park, and the full range of threats to the historical and cultural features and structures, including physical and floodwater damage, social and economic values, and public use.

Threats to the scenic, pastoral character of the riverbank by replacing the trees, wildlife habitat, and wildlife with brick and concrete, large boat trailers, and increased human activity.

Corr. ID: 166 **Organization:** *Not Specified* **Comment ID:** 413297 **Organization Type:** Unaffiliated Individual

Representative Quote: 9. Navigational hazards for motorized and non-motorized boat traffic:

The impact of increased use of the narrow river corridor between Rosslyn and Georgetown by non-motorized recreational kayakers, canoeists, and rowers competing with motorized boaters, and potential for collisions; in particular, the safety hazard of additional long rowing shells entering the water in this narrow corridor at certain times of day.

A study of current and projected uses and usable size of the water passage at different times of year. A Coast Guard or other appropriate authority should be consulted regarding the safety hazard.

10. Navigational hazards for hikers and bikers and other users of riverside trails:

The current and projected use of C&O Canal towpath and Capital Crescent Trail and potential for collisions with building construction, repair and maintenance equipment and boat trailers.

The cumulative impact of the use of new access roads, including the motorized vehicles of crew members and spectators, boat trailers carrying large, unwieldy boats, boats carried on the shoulders of crew members - - all of which could potentially tangle with the hikers, bikers, roller-bladers, baby strollers, and fishermen on the trails.

The additional impact on C&O Park, Rock Creek Park, and Capital Crescent Trail users of vehicular traffic and congestion caused by boat trailers, buses, and other vehicles stopping and turning at the end of K/Water Street.

Corr. ID: 166 **Organization:** *Not Specified* **Comment ID:** 423490 **Organization Type:** Unaffiliated Individual

Representative Quote: 4. Reduced wildlife-related recreational activities:

The reduction of recreational activity associated with viewing fish, aquatic birds, aquatic mammals, and shore birds, and fishing, in favor of non-motorized boating.

Corr. ID: 166 **Organization:** *Not Specified* **Comment ID:** 413292 **Organization Type:** Unaffiliated Individual

Representative Quote: 3. Comprehensive evaluation of cumulative impacts of meeting regional need for boathouses:

Whether the plan adequately addresses the increasing needs for boathouse training and storage facilities for local universities and high schools (public and private) as well as those of the existing paddling and rowing organizations in the same area (Potomac Boat Club and Washington Canoe Club).

Whether the proposal sets a national precedence of encouraging additional establishment of buildings for private and public use on public land previously designated to be urban green space.

The cumulative (as well as individual) environmental, social, economic, and safety impacts of all of the boathouses and facilities proposed in each alternative.

Corr. ID: 166 **Organization:** *Not Specified* **Comment ID:** 423492 **Organization Type:** Unaffiliated Individual

Representative Quote: 6. Physical destruction and erosion of riverbank and riverbed due to construction:

Whether heavy construction equipment could threaten the stability of the riverbank in the vicinity. An engineering study would be appropriate.

Scouring of the riverbank and river floor due to construction of building and docks, and resulting changes in water flow; potential silting and need for dredging.

CONCERN STATEMENT: (Concern ID: 54148) Commenters suggested that an environmental impact assessment should be done as part of the proposal. Additionally, the commenters suggested that climate change, potential impacts on the Georgetown Waterfront scenic shoreline, and the possible use of permeable materials for trail construction and new paving area should be analyzed in the EA.

Representative Quote(s):

Corr. ID: 4 **Organization:** *Not Specified* **Comment ID:** 412903 **Organization Type:** Unaffiliated Individual

Representative Quote: I sincerely hope an environmental impact assessment will be done as part of this proposal.

Increased usage of an already overused and abused and highly polluted river, especially this segment, invites further degradation of what was once known as "the river of swans".

Climate change will also greatly alter the shoreline and quality of the water and needs to be factored into what appears to be an exclusively human recreational focus.

Corr. ID: 189 **Organization:** National Capital Planning Commission **Comment ID:** 421773
Organization Type: Federal Government

Representative Quote: We also request that NPS evaluate the use of permeable materials for trail construction and any new paving areas.

Corr. ID: 189 **Organization:** National Capital Planning Commission **Comment ID:** 421748
Organization Type: Federal Government

Representative Quote: Also, given the prominent location of the proposed project along the western section of the Georgetown waterfront, NCPC is interested in the potential impacts to this scenic shoreline that was established as a nonmotorized area in the 1987 Georgetown Waterfront Park Master Plan prepared by NPS and approved by NCPC.

CONCERN STATEMENT: (Concern ID: 54149) Commenters raised questions about the heights of the proposed facilities, and if the height would have impacts on historical resources. Additionally, one commenter questioned what the facilities labeled as storage were going to include (i.e., inside storage or open canoe/kayak racks).

Representative Quote(s):

Corr. ID: 29 Organization: citizen **Comment ID: 412937 Organization Type:** Unaffiliated Individual

Representative Quote: 5. By your SF numbers, you have implied that the possible new boathouses would be only one story? Is that your intent? I would be against tall structures on the waterfront.

Corr. ID: 187 Organization: District of Columbia Office of Planning **Comment ID: 421512 Organization Type:** State Government

Representative Quote: We have a couple of questions at this point. One is about the nature of the facilities labeled as storage. Are these intended to be open canoe and kayak racks similar to those at Belle Haven Marina?

We are also interested to know what the Park Service envisions for the third dimension of each boathouse, its height. There may well be efficiency in some uses of upstairs space. The previously proposed Georgetown University boathouse may have contained spaces that were not necessarily ancillary to the crew use, and these added to its bulk, which was controversial in some quarters. Different degrees of bulk may have differing effects on historic resources, such as the adjacent historic boathouses

CONCERN STATEMENT: (Concern ID: 54150) Commenters requested that the National Park Service:

- Indicate the minimum amount of development needed that is consistent with the park's purpose and need.
- Conduct a safety study that focuses on the safety issues caused by inexperienced boaters traversing an area used by power boaters.
- Ensure that the CCT provides a safe and compatible transition for pedestrians through the nonmotorized boathouse zone to the Georgetown Waterfront Park.
- Not build a boathouse above the Alexandria Aqueduct because construction could increase traffic, and construction equipment could damage the sewer line.
- Provide assurance for the preservation of views and vistas.
- Enhance visitor use and experience, and ensure health and safety.
- Minimize the impact on traffic.
- Minimize environmental concerns, particularly impacts on wildlife habitat, erosion, and flooding.
- Safeguard cultural resources, such as historic districts and landscapes.

Representative Quote(s):

Corr. ID: 73 Organization: *Not Specified* **Comment ID: 413222 Organization Type:** Unaffiliated Individual

Representative Quote: We bring our center counsel power boat up the Potomac north of 3 sisters in the summer time. We often encounter human powered craft which linger or doddle in the river channel near the proposed area. If there is any intent to increase craft traffic, there should be a safety study which looks at the problems caused by inexperienced operators traversing an channel used by power boats transiting the area to proceed to waters above Georgetown.

Corr. ID: 132 Organization: ANC 3D **Comment ID: 413139 Organization Type:** Town or City Government

Representative Quote: The environmental assessment and evaluation of each alternative should to the greatest extent feasible:

1. Reflect the minimum amount of development consistent and commensurate with the "purpose" and "need", as stated by the NPS in its scoping presentation, for improvements to nonmotorized boating

facilities and for other park improvements;

2. Ensure that the Capital Crescent Trail and its connection to Georgetown provides a safe and compatible transition for pedestrians and bicyclists as they move from the trail through the nonmotorized boathouse zone to the Georgetown Waterfront Park; and

3. Provide assurance for the preservation and protection of views and vistas, enhance visitor use and experience, minimize the impact on traffic, promote wildlife habitat, safeguard cultural resources, particularly historic districts and landscapes, and ensure health and safety.

Corr. ID: 138 Organization: C&O Canal Association **Comment ID:** 413046 **Organization Type:** Unaffiliated Individual

Representative Quote: 2. Fragile sewer lines. The closure of the Capital Crescent Trail in the spring of 2013 illustrated the fragility of the 130-year-old sewer lines under the CCT. This factor, and the traffic congestion already existing under the Alexandria Aqueduct, rule out any major boathouse above the aqueduct. The vans towing shells and transporting crews would be bad enough, but construction machinery would be a far greater threat to these sewer conduits.

Corr. ID: 147 Organization: *Not Specified* **Comment ID:** 413075 **Organization Type:** Unaffiliated Individual

Representative Quote: ENVIRONMENTAL CONCERNS: Our community also wants to ensure that new construction along the waterfront will minimize the following negative environmental impacts on the zone:

* Further shoreline erosion - caused by the removal of trees and vegetation

* Future erosion of soft shoreline restoration - due to the aggressive flow of water and debris due to tidal changes and frequent flooding

* Potential negative effects of erosion on docks and access points - just upriver from the zone, tide and flooding have caused debris and the erosion of silt material to collect under and damage the dock in Fletcher's Cove. Our community is concerned that any large scale changes to the land upriver of Key Bridge may create similar future problems for all of the boathouses and docks within the zone.

* Flooding concerns - Currently, the boathouse facilities located in the zone are set above a steep shoreline that is reinforced with rocks. Our community is concerned that the creation of beach launches may make the shoreline and boat house facilities downriver more susceptible to flooding

ON1000 - OTHER NEPA ISSUES: GENERAL COMMENTS

CONCERN STATEMENT: (Concern ID: 54154) One commenter suggested that the National Park Service schedule an early consultation meeting to discuss the project submission.

Representative Quote(s):

Corr. ID: 189 Organization: National Capital Planning Commission **Comment ID:** 421774
Organization Type: Federal Government

Representative Quote: In addition, NCPC staff recommends that the NPS schedule an early consultation meeting to discuss the project submission.

CONCERN STATEMENT: (Concern ID: 54155) Commenters requested that additional public hearings should be scheduled, that the meetings should be advertised in regional boating publications, and that the comment period should be extended by 30 days. Additionally, one commenter suggested that the scoping process has been compromised because of a failure to consult with all stakeholders and a lack of consideration for a regional approach to meeting demand for nonmotorized boating facilities. The commenter requested that the National Park Service address these deficiencies before moving forward.

Representative Quote(s):

Corr. ID: 25 Organization: *Not Specified* **Comment ID:** 412929 **Organization Type:** Unaffiliated Individual

Representative Quote: I believe additional public hearings should be scheduled and advertised in regional boating publications such as Spinsheet and Proptalk.

Corr. ID: 82 Organization: *Not Specified* **Comment ID:** 413229 **Organization Type:** Unaffiliated Individual

Representative Quote: Additionally, PLEASE HAVE ANOTHER PUBLIC MEETING. Public notice of this has been poorly distributed.

Please extend the comment period an additional 30 days.

Corr. ID: 94 Organization: *Not Specified* **Comment ID:** 413091 **Organization Type:** Unaffiliated Individual

Representative Quote: However, I am deeply concerned that the scoping process has been compromised by a failure to consult with all stakeholders and to consider a regional approach to meeting demand for nonmotorized boating facilities. I ask that the NPS address these deficiencies before moving forward.

There has been inadequate outreach and engagement of key stakeholders. The Potomac River between Memorial Bridge and Chain Bridge is heavily used by rowers, paddlers and commercial and recreational power boats. While designated the Georgetown Nonmotorized Boathouse Zone, its development could significantly affect the power boat community and the recreational fishing communities, neither of which appears to have been adequately consulted during the development of this scoping document or the Feasibility Study which proceeded it. Additional development in the designated zone has the potential to further limit public access to the shoreline for fishing and dinghy landing. More launching and staging for nonmotorized vessels in the vicinity of Key Bridge could impair a mooring area important to the power boat community and affect necessary access to the river channel for larger vessels. Potential safety and usability impacts from increased and redistributed nonmotorized boating traffic should have been thoroughly explored in consultation with these communities.

CONCERN STATEMENT: (Concern ID: 54156) One commenter noted that it is unlikely that federal funds would be available to provide for optimal development; therefore, private entities willing to commit the necessary resources to provide quality development should be encouraged to participate.

Representative Quote(s):

Corr. ID: 134 Organization: Pacific Economics Group **Comment ID:** 413302 **Organization Type:** Unaffiliated Individual

Representative Quote: As a practical matter, it is unlikely that federal funds will be able to provide the resources necessary for optimal development. As a result, private entities willing to commit the necessary resources to provide quality development should be encouraged to participate. It is important to maintain access for the general public but this interest can be protected if an intelligent public/private coordination is implemented. Perhaps, as part of a cooperative plan for development, funding can be obtained to renovate and restore the Canoe Club facility. Cooperation between the federal government and private

entities is as old as the nation itself. In this case, it will likely be necessary in order to produce the best result for the public.

PN3000 - PURPOSE AND NEED: SCOPE OF THE ANALYSIS

CONCERN STATEMENT: (Concern ID: 54157) One commenter requested that the National Park Service address the congestion issues currently experienced at Thompson's Boat House during peak hours when school teams are practicing or regattas are occurring.

Representative Quote(s):

Corr. ID: 143 **Organization:** Washington Canoe Club **Comment ID:** 413346 **Organization Type:** Recreational Groups

Representative Quote: - Address congestion issues now experienced at Thompson's Boat House during peak times of use when school teams are practicing (mornings and afternoons) and regattas (primarily spring weekends) are occurring.

CONCERN STATEMENT: (Concern ID: 54159) Commenters suggested that the National Park Service reexamine the current site locations and identify additional locations outside of the Georgetown area, including the National Harbor, Alexandria, the Anacostia, East Potomac Park, and specifically Fletcher's Boathouse, Thompson's Boat Center, and West Potomac Park. Furthermore, commenters suggested that if Thompson's Boat Center is considered for the planning process, it should also be considered for structural repairs and a maintenance plan.

Representative Quote(s):

Corr. ID: 64 **Organization:** CPA, CKA and WKC **Comment ID:** 425688 **Organization Type:** Unaffiliated Individual

Representative Quote: d. EXPAND PLAN - To include improving water access from nearby locations such as Haines Point (create beach) and Fletcher's Cove (improve access for vehicles with car-top boats).

Corr. ID: 94 **Organization:** *Not Specified* **Comment ID:** 413092 **Organization Type:** Unaffiliated Individual

Representative Quote: The scoping document fails to consider the potential to develop nonmotorized boating facilities throughout the greater Washington DC area. High regional demand for boating facilities and water access is used as a justification for development of multiple new facilities in an already congested area. A rational, regional approach for meeting demand would recognize that there are alternatives to intensive development of the west Georgetown Waterfront. Given the concurrent feasibility study for a nonmotorized boating facility in Arlington and the underdevelopment of and underinvestment in Anacostia Park this would be a great time to plan on a wider scale. Regional demand should be met through a regional scale plan.

Corr. ID: 97 **Organization:** Rock Creek Rowing, PRC, Washington Lee HS **Comment ID:** 413096 **Organization Type:** Unaffiliated Individual

Representative Quote: Whereas the importance of additional boat space and access cannot be underestimated, the maintenance and upkeep of Thompson Boat Center should be considered in the planning process. It is very likely, given the current extreme overcrowding, that even the high density plan will not relieve fully the overuse issue at Thompsons. Thompson's is in need of significant repairs and a sustainable maintenance plan. In addition, the building has no heat or water during the off season and therefor the building is not accessible. Winter access would provide space for off season training, a potential revenue stream for the facility. While protected indoor, space is optimal for safe equipment and

boat storage, the availability of additional outdoor storage is also needed, especially as improvements occur

Corr. ID: 106 **Organization:** Chesapeake Paddlers Association (CPA); Washington Kayak Club (WKC) **Comment ID:** 413277 **Organization Type:** Unaffiliated Individual

Representative Quote: 6. OTHER NPS DC PUBLIC LAUNCH SITES - THE BIGGER PICTURE: The problem for paddler access into the Potomac River, along the Washington DC region is more broader in scope.

- 6a. In its planning, NPS should incorporate a 'global plan' in its strategy that better addresses public need for greater Potomac River access.

- 6b. The Congressional mandate to NPS that separates the Georgetown NMBZ Waterfront Project from the Arlington NMBZ Waterfront Project into a single overall environment impact appears flawed, especially since the net or combined environmental impact would potentially concentrate up to 8 Boathouses in proximity of the Key Memorial Bridge. In my view, the combined development would disproportionately favor regional rowing clubs and crews against the greater number of recreational paddlers who lack access and appropriate facilities.

- 6c. Fletcher's Boathouse offers a significant potential to 'ease' paddler access, if developed.

Unfortunately, parking access into the main parking lot by driving under the C&O Canal Aquaduct Tunnel prevents paddlers with SUVs and trucks who car-top launch. Parking by the Lock House is often inadequate and too far from the canoe/kayak launch site.

Corr. ID: 156 **Organization:** Potomac River Access Coalition **Comment ID:** 413351 **Organization Type:** Recreational Groups

Representative Quote: Earlier in these comments, we noted the public benefit that would result from the two university rowing programs being relocated out of Thompson Boat Center thereby freeing up significant space at Thompson's for high school and individual rowing. We would urge the National Park Service to then look at creative approaches to ensuring the long overdue redesign of Thompson's to better serve those needs.

Also, again outside the scope of the current Environmental Assessment, we encourage the Park Service to consider West Potomac Park, as well as Fletcher's Boathouse, as viable alternative sites for public river access for canoes, kayaks and paddleboards. West Potomac Park has a considerable expanse of open access to the Potomac River. In addition, parking is more readily available than in or near other locations in the Boathouse Zone. Locating such a facility there would help alleviate not only parking, but also traffic congestion among cars, bicyclists and pedestrians in the Non-motorized Boathouse Zone.

Corr. ID: 156 **Organization:** Potomac River Access Coalition **Comment ID:** 413349 **Organization Type:** Recreational Groups

Representative Quote: Because of the foregoing considerations and constraints, we together urge the National Park Service to reexamine the currently identified sites and configurations and provide greater flexibility in locating viable sites for two university boathouses. Moving the two university programs from Thompson Boat Center into such facilities would free up space at Thompson's to be reprogrammed to allow greater general public access to the Potomac. The Georgetown and George Washington Universities' rowing programs currently occupy 62% of Thompson's indoor shell storage space. The facility also serves over a dozen high school and master's rowing programs as well as many individuals. Furthermore, it is important to keep in mind that both of the Universities own valuable parcels of Potomac shoreline property within the C & O Canal NHP area or adjacent to it and the NPS Rock Creek unit. These parcels would be transferred to the NPS in exchange for sites of lesser natural and historic importance located in the NMBZ. Completing these land exchanges with the National Park Service would clearly be in the public interest.

Corr. ID: 157 **Organization:** Not Specified **Comment ID:** 413304 **Organization Type:** Unaffiliated Individual

Representative Quote: Request only one boathouse be built in this area to primarily accommodate the needs of DC schools. Additional public boathouses should be built in OTHER areas of the Potomac River and not all crowded into this one area - it will result in far too much traffic (both on and off water) for this area. Additional public boathouses could be built in the vicinity of National Harbor, Alexandria, the Anacostia, East Potomac Park, and further upriver of the Key Bridge. Public boathouses MUST be spread-out to manage the density of nonmotorized traffic along the Potomac River.

Corr. ID: 158 **Organization:** *Not Specified* **Comment ID:** 413364 **Organization Type:** Unaffiliated Individual

Representative Quote: - Locate new rowing and paddling facilities along the river bank for easy access while posing minimal disruption of natural and cultural resources

Corr. ID: 167 **Organization:** The Potomac Boat Club **Comment ID:** 413283 **Organization Type:** Recreational Groups

Representative Quote: We would also suggest that NPS could identify additional locations outside the small area identified as the NMBZ for launching kayaks, SUPs and canoes, such as West Potomac Park. There is no good reason to delay action on siting facilities within the NMBZ, but there are additional places to consider that would be consistent with good stewardship of the public domain and improved access for river based recreation. Additional locations beyond the NMBZ would also reduce the impact of concentrating river access in one small area.

Corr. ID: 173 **Organization:** rower at Rock Creek Rowing, using TBC **Comment ID:** 413321
Organization Type: Unaffiliated Individual

Representative Quote: 7. While outside the scope of the current Environmental Assessment, the public boathouse Thompson Boat Center (TBC) is in desperate need of significant structural change. I urge the National Park Service to look at creative approaches to ensuring the long overdue redesign and re-programming of Thompson's to better serve the needs of the public year-round.

8. In addition there are other nearby waterfront opportunities to consider such as West Potomac Park, which currently already has vehicle access - and one of the significant limitations of the NMBZ is abundant vehicle access. Fletcher's Boathouse is likely another viable alternative site for public river access for canoes, kayaks and paddleboards.

The Potomac riverfront and river access is more than the limited NMBZ area in the Key Bridge vicinity. Other areas to consider include Thompson Boat Center, West Potomac Park and Fletcher's.

CONCERN STATEMENT: (Concern ID: 54161) Commenters suggested that the addition of boathouses along the Potomac River should be considered without size restrictions or a maximum cap on number, and that there should be flexibility in the definitions of the five sites considered for boathouse boundaries.

Representative Quote(s):

Corr. ID: 154 **Organization:** Friends of Georgetown Waterfront Park **Comment ID:** 413335
Organization Type: Recreational Groups

Representative Quote: FOG WP fully supports the Comments of the Potomac River Access Coalition which call for more boathouses along the Potomac River without the size restrictions proposed in the scoping notice (which contradict the FAR requirements under D.C. zoning law for these parcels), and seek flexibility in the definition of the boundaries of the five sites for construction of boathouses for reasons outlined in the Coalition's comments.

Corr. ID: 164 **Organization:** Georgetown Business Improvement District **Comment ID:** 413262
Organization Type: Business

Representative Quote: 3) NPS should leave all of its options open by planning for the maximum number of potential boathouse sites in their alternatives analysis - so that it has the ability to approve fewer boathouses, but is not constrained by a cap at the conclusion of the NMBZDP.

CONCERN STATEMENT: (Concern ID: 54162) One commenter suggested that the National Park Service conduct a study similar to the feasibility study of 1987 to consider the increased use of motorized vessels.

Representative Quote(s):

Corr. ID: 24 **Organization:** Not Specified **Comment ID:** 413252 **Organization Type:** Unaffiliated Individual

Representative Quote: As I understand it, this proposal is predicated on a plan from 1987, and does not address the waterways of today; just glancing at the river on a summer day, it is evident that motorized boats use the river heavily. Can we do a study, not only on the non-motorized vessel use but on all types of vessels that utilize the shoreline impacted by this project?

Another intent of the project, listed in the document, was to balance diverse user demands. While there has been an increase in popularity of non-motorized craft, only allowing this type of craft to access this large area of shoreline is not balanced. Why not allow motorized dinghies or at least provide a place for them to meet the intent of 'balanced demands?'

CONCERN STATEMENT: (Concern ID: 54163) One commenter suggested that the proposed alternatives do not meet the stated purpose of the project because the alternatives decrease river access for a majority of nonmotorized boat users.

Representative Quote(s):

Corr. ID: 64 **Organization:** CPA, CKA and WKC **Comment ID:** 413218 **Organization Type:** Unaffiliated Individual

Representative Quote: 2) YOUR PROPOSED ALTERNATIVES FAIL TO MEET THEIR STATED PURPOSE (Of Improved River Access for Non-motorized Recreational Use).

- a. Stated purpose "is to establish a Potomac River recreation zone that more fully supports non-motorized recreation, increases access to the river, improves functionality of the Capital Crescent Trail as it connects to the Georgetown Waterfront Park and respects the historic character, natural resources and existing recreational use of the Chesapeake and Ohio National Historic Park and Rock Creek Park."
- b. In fact, the plan does NOT support recreational access and DECREASES river access at that location for the majority of non-motorized boat users.

CONCERN STATEMENT: (Concern ID: 54164) Commenters discussed the scope of the project, including requests to (1) include dockage for power boaters because there is a lack of powerboat docking facilities in the Washington area and powerboaters outnumber nonmotorized boat users; (2) keep the current mixture of motorized and nonmotorized use the same; and (3) allow motorized access to the Three Sisters location.

Representative Quote(s):

Corr. ID: 10 **Organization:** Not Specified **Comment ID:** 412912 **Organization Type:** Unaffiliated Individual

Representative Quote: If the plan is for a completely non motorized boat zone past Key Bridge (restricting motorboat access) then we certainly should NOT do it. Motor boats have been cruising to "Three Sisters" and various other locations in this area for safe and serene anchoring for quite some time. It seems kind of unfair when there's already limited scenic boating and cruising options as well as limited

docking and anchoring for motor boats in and around DC. Maybe the plan could be revised to continue to share the waterway and ensure that the universities can benefit more by having designated practice and rowing areas with the use of appropriate navigational and speed control buoys.

Corr. ID: 25 Organization: *Not Specified* **Comment ID:** 412928 **Organization Type:** Unaffiliated Individual

Representative Quote: I believe it is very important that I continue to be allowed to take my large vessel (40') and my runabout (17') to visit and anchor in the waters north of Three Sisters. I specifically want to make sure that the waters on the west side of the Potomac River remain navigable to powered vessels transiting the area.

Corr. ID: 32 Organization: Chesapeake Bay Yacht Club Association **Comment ID:** 413151
Organization Type: Recreational Groups

Representative Quote: Powerboaters far outnumber non motorized boaters. The acute lack of powerboat docking facilities in all of Washington are obvious. The question must be asked why are powerboaters concerns being excluded? We believe that the river and the waterfront should be shared by all, and not restricted in any manner. The park is for the preservation and benefit of all of the public. There is absolutely no reason to limit the area in question to non powerboats. Powerboats do not have any special needs or requirements. Furthermore, there is no safety issue regarding power and non power boats co-existing. There is obviously much room available for powerboat docking. The physical docks are similar. At the very least docking for dinghys and small powerboats should be provided. The dinghy docks in Annapolis, Md. is a great example. Also the waters north of Memorial Bridge is a no wake zone so safety is not an issue. The proposed plan is significantly one-sided in that it does not provide for a balance of water related recreational activities. To propose only "non-motor" boating related activities does not recognize the serious need for expanded dock-space for power boats. The current dock space allowed for non-commercial power boats on the Georgetown bulkhead has been significantly reduced by commercial cruise boat set-asides. One only has to look at the number of boats crammed into the limited space on summer evenings to realize something is wrong. This situation makes for unsafe conditions with so many boats tied together and their owners and guests crawling over each other trying to get ashore or back to their boats. It also limits access to the businesses that have a large part of their income generated by the visiting power boat owners and their guests. The Chesapeake Bay Yacht Club Association has passed a motion to allow powerboat docking on the DC side of the river, in direct objection and opposition to your non powerboat proposed area by the key bridge. We now propose that at minimal cost and great benefit, that the plans for the zone in question include dockage for powerboats. We do not propose or request any other special needs such as electric, fuel, pumpout, or any structures- just an environmental friendly simple dock capable of handling powerboats. There is no requirement for parking facilities as would be the case for crew boat facilities.

Corr. ID: 136 Organization: DC Cruises, LLC **Comment ID:** 413141 **Organization Type:** Business

Representative Quote: We support the responsible use of this historic navigable waterway by all users, motorized and non-motorized. Our concern is that any land-side development, such as the various plans proposed in this notice, while increasing the access for small craft recreation on the river, not restrict access to the river for the large number of visitors who come to enjoy the area by powered craft, whether commercial or private. After all, not all visitors are capable of paddling a kayak or rowing a scull.

In conclusion, this historic navigable waterway has been shared for hundreds of years, both commercially and recreationally, by many different types of users. The current mix strikes a fine balance, allowing access to visitors of all ages and abilities without compromising the environment in any way. Any development should continue this successful pattern into the future.

PN4000 - PURPOSE AND NEED: PARK LEGISLATION/AUTHORITY

CONCERN STATEMENT: (Concern ID: 54166) Commenters questioned whether the alternatives adhere to regional and federal planning laws and policies.

Representative Quote(s):

Corr. ID: 91 **Organization:** Watersedge, **Comment ID:** 413087 **Organization Type:** Unaffiliated Individual

Representative Quote: Considering the large amount of money that this project requires, the NPS should be supporting the President's Executive Orders call for 300 new public access points to the Chesapeake by 2025:

Expand public access to the Bay and its rivers from federal lands and conserve landscapes of the watershed. (Dept. of Interior)

<http://executiveorder.chesapeakebay.net/page/About-the-Executive-Order.aspx>.

CONCERN STATEMENT: (Concern ID: 54167) Commenters questioned the impact of the Arlington Boathouse on the Georgetown Boathouse EA.

Representative Quote(s):

Corr. ID: 11 **Organization:** Not Specified **Comment ID:** 412913 **Organization Type:** Unaffiliated Individual

Representative Quote: Build the Arlington boathouse and you won't need a lot of additional facilities to fulfill the demand in Georgetown, but don't treat these as separate issues.

Corr. ID: 138 **Organization:** C&O Canal Association **Comment ID:** 413045 **Organization Type:** Unaffiliated Individual

Representative Quote: 1. Arlington Boathouse. The need for new non-motorized boathouse capacity in Georgetown was based, in substantial part, on the large crew teams of three Arlington and Fairfax County high schools: McLean, Bishop O'Connell, and, above all, Yorktown. According to the August 2013 Feasibility Study, Yorktown has a crew team second in size only to Georgetown University. In addition, an Arlington boathouse only three miles east of the Washington & Lee High School campus would likely draw that school from its current facilities at the Potomac Boat Club; the citizen group promoting the Arlington boathouse considers its efforts to be inspired by the late W&L crew coach Charlie Butt. Finally, Maryland high schools near the Beltway - Walt Whitman and Bethesda-Chevy Chase, each with a 100-member crew team, and Holton-Arms - might be attracted to a boathouse conveniently located on the GW Parkway. These add up to half the total 1210 athlete "requirement" for a Georgetown boathouse.

Progress toward a boathouse in Arlington seems to be moving more quickly than on the District side of the river. In 2014, the Arlington County Board bought (for \$2.4 million) a parcel of land near Key Bridge that could be used for part of a boathouse complex. In addition, the new supervisor of the George Washington Memorial Parkway, Alex Romero, has retained the Louis Berger Group to work on the project. What would be the impact of an Arlington boathouse on the requirement for a Georgetown boathouse?

Corr. ID: 166 **Organization:** Not Specified **Comment ID:** 413291 **Organization Type:** Unaffiliated Individual

Representative Quote: 1. Consistency with regional riverfront open-space planning efforts: Whether the alternatives are consistent with local and regional planning efforts to set aside land adjacent to the Potomac and Anacostia Rivers as open green space.

CONCERN STATEMENT: (Concern ID: 54169) Commenters supported the preservation of natural, historical, and cultural resources, as well as the viewshed within the Potomac Gorge, and suggested that building a boathouse and other commercial structures along with public concessions within a park is in direct conflict with the philosophy and goals of the C&O Canal National Historical Park.

Representative Quote(s):

Corr. ID: 39 **Organization:** *Not Specified* **Comment ID:** 413169 **Organization Type:** Unaffiliated Individual

Representative Quote: The C&O Canal is a historic site. There are constant reminders that what is done within the park needs to reflect the history, the way of life and appearance of the canal as best it can be done during its original time as an integral part of our country's early developmental times. Today's operation and maintenance continues to stress "historical significance".

Building a boathouse and other commercial structures along with public concessions within the park is in direct conflict with the presumed philosophy and goals of the C&O Canal NHP.

Working with the D.C. government and Georgetown, similar opportunities should be available that do not distort, distract from and destroy the basic tenets of the park by considering a more appropriate setting outside of the boundaries of the park.

Corr. ID: 131 **Organization:** Committee of 100 on the Federal City **Comment ID:** 413238
Organization Type: Conservation/Preservation

Representative Quote: In that same spirit, C100 continues to advocate for the prohibition of private development within the C&OCNHP and supports the preservation of the natural, historic and cultural resources of the area as well as the viewshed within the Potomac Gorge. Over time the demands for facilities and related infrastructure improvements have increased as confirmed by the 2013 Feasibility Study, to which C100 submitted comments. This increase in demand for greater access to the river should not compete with other activities such as walking and biking, nor with NPS' responsibility to protect and preserve the unique resources of the C&OCNHP.

Careful and thorough consideration must be given in the Environmental Assessment to the potential impacts in the zone from private development, congestion, safety and traffic issues related to the project.

Corr. ID: 165 **Organization:** National Parks Conservation Association **Comment ID:** 413331
Organization Type: Conservation/Preservation

Representative Quote: While C&O Canal National Historical Park's towpath and the Capital Crescent Trail are heavily used and enjoyed recreational destinations, NPS must not promote recreational activities at the expense of conservation of natural and cultural resources, public safety, and quiet enjoyment by park visitors.

As established in C&O Canal National Historical Park's 1971 enabling legislation, the specific purposes of the park are to "preserve and interpret the historic and scenic features of the Chesapeake and Ohio Canal, and to develop the potential of the canal for public recreation." Development of facilities for recreation should be done in a way that avoids impacts to the park's historic and natural resources.

Corr. ID: 166 **Organization:** *Not Specified* **Comment ID:** 425663 **Organization Type:** Unaffiliated Individual

Representative Quote: 2. National Park Service role and precedent:

Whether NPS, as the nation's steward of much of the Washington-area riverbank, is acting consistently with its mission of balancing preservation of property of national significance with broad public use.

Whether the alternatives are consistent with the legislative intent and history for the C&O Canal National Historical Park, Rock Creek Park, the Capper-Crampton Act, and the National Historic Preservation Act.

Whether the evaluation and opinions of the C&O Canal National Historical Park Advisory Commission, an official body established by Congress to advise on matters affecting the C&O park, have been adequately considered.

CONCERN STATEMENT: (Concern ID: 54170) One commenter suggested that leasing a facility for private use would run counter to the canal park's mission to serve the broad public.

Representative Quote(s):

Corr. ID: 105 **Organization:** *Not Specified* **Comment ID:** 425719 **Organization Type:** Unaffiliated Individual

Representative Quote: Similarly, leasing a facility for private use would run counter to the canal park's mission to serve the broad public.

The boathouse zone includes enough land downriver from the Aqueduct Bridge to make possible a huge and sufficient increase in facilities for academic rowing in Georgetown. The demand for such facilities is legitimate, but rowers are only one of several groups who have an enduring stake in the future of this area. The forthcoming draft Environmental Assessment can lead to a solution that will benefit a broad spectrum of recreational and cultural interests without harming the C&O Canal NHP.

PN9000 - PURPOSE AND NEED: ISSUES AND IMPACT TOPICS SELECTED FOR ANALYSES

CONCERN STATEMENT: (Concern ID: 54171) One commenter requested that issues related to the hydrologic and hydraulic impacts of proposed development be studied, especially the impacts on the river's soils, water quality, water flows, vegetation, wildlife, habitat, and storm water management.

Representative Quote(s):

Corr. ID: 165 **Organization:** National Parks Conservation Association **Comment ID:** 413329
Organization Type: Conservation/Preservation

Representative Quote: As NPS considers potential impacts as a result of preparing the Non-motorized Boathouse Zone Development Plan, we ask that issues related to the hydrologic and hydraulic impacts of proposed development are studied. This segment of the Potomac River is a critical zone for the protection of tidal wetlands for plant and animal habitat, flood control, and storm water management. For any new development being considered, the impacts on the river's soils, water quality, water flows, vegetation, wildlife, habitat, and storm water management should be considered.

CONCERN STATEMENT: (Concern ID: 54173) One commenter suggested that the EA should describe potential impacts that the project may have on existing natural and human environment, specifically impacts on existing submerged aquatic vegetation, wetlands, water quality, existing natural shorelines, aquatic resources, forest cover, special status species, air quality, noise, light, traffic, environmental justice, and climate change (which will affect rainfall, storm surges, and flooding). Additionally, the commenter suggested that the National Park Service coordinate with other appropriate federal, state, and local resource agencies on possible impacts.

Representative Quote(s):

Corr. ID: 188 **Organization:** US EPA **Comment ID:** 421513 **Organization Type:** Federal Government

Representative Quote: With the increase of the public's access to the Potomac River, the EA should describe potential impacts that the project may have to the existing natural and human environment. EPA encourages the identification of existing submerged aquatic vegetation and the potential for adverse impacts to resources such as wetlands, water quality, existing natural shorelines, aquatic resources and forest cover. EPA suggests that the EA describe how impacts to these natural resources will be avoided or minimized. EPA advocates coordinating with other appropriate federal, state and local resource agencies on possible impacts to wetlands, streams, historic resources and/or rare, threatened and endangered species.

Air quality and community impacts from the project and its construction should be evaluated and minimized. This should include noise, light and potential traffic impacts during construction and the final project.

Environmental Justice (EJ) should also be evaluated, including the identification of potential communities of concern, and meaningful and timely community involvement, public outreach, and access to information. Consideration should also be given to all potential impacts to at-risk populations, as well as consideration to sensitive subpopulations, possibly including elderly, children and others. Community impacts should also be avoided, minimized and mitigated.

EPA would like the National Park Service to consider climate change in the development of the EA. Climate change will affect rainfall, storm surges, and flooding. These topics should be discussed throughout the EA as they are a concern for many future projects. The EA should also discuss any increase in impervious surface, increase of stormwater from the final project and its construction as well as mitigation techniques used to reduce or control stormwater runoff.

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APPENDIX 1: LIST OF CORRESPONDENCES

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Proj ID	Doc ID	Corr ID	Form Letter	Org Type	Organization	Affiliation
54903	63519	1	NO	Business	Bay Kayaking (Small business)	Official Rep
54903	63519	2	NO	Unaffiliated Individual		
54903	63519	3	NO	Unaffiliated Individual		
54903	63519	4	NO	Unaffiliated Individual		
54903	63519	5	NO	Unaffiliated Individual		
54903	63519	6	NO	Unaffiliated Individual		
54903	63519	7	NO	Unaffiliated Individual		
54903	63519	8	NO	Unaffiliated Individual		
54903	63519	9	NO	Unaffiliated Individual	L. L. Lauder, Inc.	Member
54903	63519	10	NO	Unaffiliated Individual		
54903	63519	11	NO	Unaffiliated Individual		
54903	63519	12	NO	Unaffiliated Individual		
54903	63519	13	NO	Unaffiliated Individual		
54903	63519	14	NO	Unaffiliated Individual		
54903	63519	15	NO	Unaffiliated Individual		
54903	63519	16	NO	Unaffiliated Individual	Chesapeake Paddlers Association	Member
54903	63519	17	NO	Unaffiliated Individual		
54903	63519	18	NO	Unaffiliated Individual		
54903	63519	19	NO	Unaffiliated Individual		
54903	63519	20	NO	Unaffiliated Individual		
54903	63519	21	NO	Unaffiliated Individual		
54903	63519	22	NO	Unaffiliated Individual	Georgetown Homeowner	Official Rep
54903	63519	23	NO	Conservation/Preservation	C&O Canal Association	Official Rep
54903	63519	24	NO	Unaffiliated Individual		
54903	63519	25	NO	Unaffiliated Individual		

54903	63519	26	NO	Unaffiliated Individual	Chesapeake Kayakers Association	Member
54903	63519	27	NO	Unaffiliated Individual	Capital Yacht Club	Member
54903	63519	28	NO	Unaffiliated Individual		
54903	63519	29	NO	Unaffiliated Individual	citizen	Member
54903	63519	30	NO	Unaffiliated Individual	C & O Canal Association	Member
54903	63519	31	NO	Conservation/Preservation	Defenders of Potomac River Parkland	Official Rep
54903	63519	32	NO	Recreational Groups	Chesapeake Bay Yacht Club Association	Official Rep
54903	63519	33	NO	Unaffiliated Individual		
54903	63519	34	NO	Unaffiliated Individual	WCC	Member
54903	63519	35	NO	Unaffiliated Individual		
54903	63519	36	NO	Unaffiliated Individual		
54903	63519	37	NO	Unaffiliated Individual		
54903	63519	38	NO	Unaffiliated Individual		
54903	63519	39	NO	Unaffiliated Individual		
54903	63519	40	NO	Unaffiliated Individual	Georgetown University	
54903	63519	41	NO	Unaffiliated Individual	Capital Yacht Club	Member
54903	63519	42	NO	Unaffiliated Individual	Woodrow Wilson Crew Boosters	Member
54903	63519	43	NO	Unaffiliated Individual		
54903	63519	44	NO	Unaffiliated Individual		
54903	63519	45	NO	Unaffiliated Individual		
54903	63519	46	NO	Unaffiliated Individual		
54903	63519	47	NO	Recreational Groups	Potomac Kayak Club	Official Rep
54903	63519	48	NO	Business	Bay Kayaking LLC	Official Rep
54903	63519	49	NO	Unaffiliated Individual	Chesapeake Kayak Adventures	Member
54903	63519	50	NO	Unaffiliated Individual		

54903	63519	51	NO	Unaffiliated Individual	CPA, WKC	Member
54903	63519	52	NO	Unaffiliated Individual		
54903	63519	53	NO	Unaffiliated Individual	Chesapeake Kayak Club, Washington Kayak Club	Member
54903	63519	54	NO	Unaffiliated Individual	Washington Kayak Club	Member
54903	63519	55	NO	Business	Chesapeake Kayak Adventures	Official Rep
54903	63519	56	NO	Unaffiliated Individual		
54903	63519	57	NO	Unaffiliated Individual		
54903	63519	58	NO	Unaffiliated Individual		
54903	63519	59	NO	Unaffiliated Individual		
54903	63519	60	Master	Unaffiliated Individual		
54903	63519	61	NO	Unaffiliated Individual	C&O Canal Association	Member
54903	63519	62	NO	Unaffiliated Individual		
54903	63519	63	Yes	Unaffiliated Individual		
54903	63519	64	NO	Unaffiliated Individual	CPA, CKA and WKC	Member
54903	63519	65	NO	Unaffiliated Individual	Chesapeake Kayak Adventures	Member
54903	63519	66	Yes	Unaffiliated Individual		
54903	63519	67	NO	Unaffiliated Individual		
54903	63519	68	NO	Unaffiliated Individual		
54903	63519	69	Master	Unaffiliated Individual		
54903	63519	70	NO	Unaffiliated Individual		
54903	63519	71	NO	Unaffiliated Individual		
54903	63519	72	NO	Unaffiliated Individual	Chesapeake kayak	Member
54903	63519	73	NO	Unaffiliated Individual		
54903	63519	74	NO	Unaffiliated Individual		
54903	63519	75	NO	Unaffiliated Individual		

54903	63519	76	NO	Unaffiliated Individual	C&O Canal Association	Member
54903	63519	77	NO	Unaffiliated Individual	Chesapeake Kayak Adventures	Member
54903	63519	78	Yes	Unaffiliated Individual		
54903	63519	79	Yes	Unaffiliated Individual		
54903	63519	80	NO	Unaffiliated Individual		
54903	63519	81	Yes	Unaffiliated Individual		
54903	63519	82	NO	Unaffiliated Individual		
54903	63519	83	NO	Unaffiliated Individual		
54903	63519	84	NO	Unaffiliated Individual		
54903	63519	85	NO	Recreational Groups	Rock Creek Rowing Inc.	Official Rep
54903	63519	86	NO	Unaffiliated Individual		
54903	63519	87	NO	Unaffiliated Individual		
54903	63519	88	NO	Unaffiliated Individual	Many enviro organizations	Member
54903	63519	89	NO	Unaffiliated Individual		
54903	63519	90	NO	Unaffiliated Individual	Chesapeake Paddlers Assoc	Member
54903	63519	91	NO	Unaffiliated Individual	Watersedge,	Member
54903	63519	92	NO	Unaffiliated Individual	Chesapeake Kayak Adventures	Member
54903	63519	93	NO	Unaffiliated Individual		
54903	63519	94	NO	Unaffiliated Individual		
54903	63519	95	Yes	Unaffiliated Individual		
54903	63519	96	Yes	Unaffiliated Individual		
54903	63519	97	NO	Unaffiliated Individual	Rock Creek Rowing, PRC, Washington Lee HS	Member
54903	63519	98	Yes	Unaffiliated Individual		
54903	63519	99	Yes	Unaffiliated Individual		
54903	63519	100	Yes	Unaffiliated Individual		

54903	63519	101	Yes	Unaffiliated Individual		
54903	63519	102	NO	Unaffiliated Individual	Potomac River Yacht Clubs Association	Member
54903	63519	103	NO	Unaffiliated Individual		
54903	63519	104	Yes	Unaffiliated Individual		
54903	63519	105	NO	Unaffiliated Individual		
54903	63519	106	NO	Unaffiliated Individual	Chesapeake Paddlers Association (CPA); Washington Kayak Club (WKC)0	Member
54903	63519	107	NO	Recreational Groups	Canoe Cruisers Association	Official Rep
54903	63519	108	NO	Unaffiliated Individual		
54903	63519	109	NO	Unaffiliated Individual		
54903	63519	110	NO	Unaffiliated Individual		
54903	63519	111	NO	Conservation/Preservation	Coalition for the Capital Crescent Trail	Official Rep
54903	63519	112	NO	Recreational Groups	Prince William Yacht Club	Official Rep
54903	63519	113	NO	Unaffiliated Individual		
54903	63519	114	NO	Unaffiliated Individual	PWYC	Member
54903	63519	115	NO	Unaffiliated Individual		
54903	63519	116	Yes	Unaffiliated Individual		
54903	63519	117	NO	Unaffiliated Individual		
54903	63519	118	NO	Unaffiliated Individual		
54903	63519	119	Yes	Recreational Groups	Washington Kayak Club	Official Rep
54903	63519	120	NO	Unaffiliated Individual	Chesapeake Kayak Adventures meetup	Member
54903	63519	121	Yes	Unaffiliated Individual		
54903	63519	122	NO	Unaffiliated Individual		
54903	63519	123	Yes	Unaffiliated Individual		
54903	63519	124	Yes	Unaffiliated Individual		
54903	63519	125	NO	Unaffiliated Individual		

54903	63519	126	Yes	Unaffiliated Individual		
54903	63519	127	NO	Unaffiliated Individual		
54903	63519	128	NO	Unaffiliated Individual		
54903	63519	129	NO	Unaffiliated Individual	C&O Canal Association	Member
54903	63519	130	NO	Unaffiliated Individual		
54903	63519	131	NO	Conservation/Preservation	Committee of 100 on the Federal City	Official Rep
54903	63519	132	NO	Town or City Government	ANC 3D	Official Rep
54903	63519	133	Yes	Unaffiliated Individual		
54903	63519	134	NO	Unaffiliated Individual	Pacific Economics Group	Member
54903	63519	135	Yes	Unaffiliated Individual		
54903	63519	136	NO	Business	DC Cruises, LLC	Official Rep
54903	63519	137	NO	Recreational Groups	Chesapeake Paddlers Association, Inc.	Official Rep
54903	63519	138	NO	Unaffiliated Individual	C&O Canal Association	Member
54903	63519	139	NO	Unaffiliated Individual		
54903	63519	140	NO	Unaffiliated Individual		
54903	63519	141	NO	Unaffiliated Individual		
54903	63519	142	NO	Unaffiliated Individual	Former member of the Federal C&O Canal NHP Commission	Official Rep
54903	63519	143	NO	Recreational Groups	Washington Canoe Club	Official Rep
54903	63519	144	NO	County Government	Anne Arundel County Water Trail Committee	Official Rep
54903	63519	145	Yes	Unaffiliated Individual		
54903	63519	146	Yes	Unaffiliated Individual		
54903	63519	147	Master	Unaffiliated Individual		
54903	63519	148	NO	Unaffiliated Individual		
54903	63519	149	Yes	Unaffiliated Individual		
54903	63519	150	Yes	Unaffiliated Individual		

54903	63519	151	NO	Unaffiliated Individual	Chesapeake Paddlers Association	Member
54903	63519	152	NO	Unaffiliated Individual		
54903	63519	153	NO	State Government	District of Columbia Water and Sewer Authority	Official Rep
54903	63519	154	NO	Recreational Groups	Friends of Georgetown Waterfront Park	Official Rep
54903	63519	155	Yes	Unaffiliated Individual		
54903	63519	156	NO	Recreational Groups	Potomac River Access Coalition	Member
54903	63519	157	NO	Unaffiliated Individual		
54903	63519	158	NO	Unaffiliated Individual		
54903	63519	159	NO	Recreational Groups	Bethesda-Chevy Chase High School rowing team	Official Rep
54903	63519	160	NO	Unaffiliated Individual		
54903	63519	161	NO	Unaffiliated Individual		
54903	63519	162	NO	Unaffiliated Individual		
54903	63519	163	NO	Unaffiliated Individual		
54903	63519	164	NO	Business	Georgetown Business Improvement District	Member
54903	63519	165	NO	Conservation/Preservation	National Parks Conservation Association	Official Rep
54903	63519	166	NO	Unaffiliated Individual		
54903	63519	167	NO	Recreational Groups	The Potomac Boat Club	Official Rep
54903	63519	168	NO	Unaffiliated Individual		
54903	63519	169	Yes	Unaffiliated Individual		
54903	63519	170	NO	Unaffiliated Individual		
54903	63519	171	NO	Unaffiliated Individual	Rock Creek Rowing & Former Wilson High School Crew Booster	Member
54903	63519	172	NO	Unaffiliated Individual		
54903	63519	173	NO	Unaffiliated Individual	rower at Rock Creek Rowing, using TBC	Member

54903	63519	174	NO	Unaffiliated Individual	Council of the District of Columbia	Member
54903	63519	175	NO	Unaffiliated Individual		
54903	63519	176	NO	Unaffiliated Individual		
54903	63519	177	Potential	Conservation/Preservation	Surfrider Foundation - DC Chapter	Official Rep
54903	63519	178	NO	Unaffiliated Individual		
54903	63519	179	NO	Unaffiliated Individual		
54903	63519	180	NO	Unaffiliated Individual		
54903	63519	181	NO	Unaffiliated Individual	CBYCA	Member
54903	63519	182	NO	Unaffiliated Individual		
54903	63519	183	NO	Recreational Groups	Potomac River Yacht Clubs Association	Official Rep
54903	63519	184	Yes	Unaffiliated Individual		
54903	63519	185	NO	Unaffiliated Individual		
54903	63519	186	NO	Unaffiliated Individual		
54903	63519	187	NO	State Government	District of Columbia Office of Planning	Official Rep
54903	63519	188	NO	Federal Government	US EPA	Official Rep
54903	63519	189	NO	Federal Government	National Capital Planning Commission	Official Rep

APPENDIX 2: PUBLIC SCOPING NOTICE

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Dear Sir or Madam,

The National Park Service (NPS) is developing an implementation plan for nonmotorized boating facilities and related park improvements in the western section of Georgetown Waterfront Park in Washington, D.C. The 1987 Georgetown Waterfront Park Master Plan established a zone for boathouse facilities that has not yet been implemented. The need for such facilities was confirmed in the 2013 Feasibility Study for a Nonmotorized Boathouse Zone.

The proposed project area extends from 34th Street, NW within Georgetown Waterfront Park to approximately a quarter-mile upriver from Key Bridge. The project area encompasses both public and private land including portions of the Chesapeake and Ohio Canal National Historical Park, Rock Creek Park, and several privately-owned parcels (the Potomac Boat Club, several private residences, and a small parcel accessible from the shoreline only).

The purpose of this project is establish a Potomac River recreation zone that more fully supports non-motorized recreation, increases the public's access to the river, improves functionality of the Capital Crescent Trail (CCT) as it connects to the Georgetown Waterfront Park, and respects the historic character, natural resources, and existing recreational use of the Chesapeake and Ohio Canal National Historical Park and Rock Creek Park. Nonmotorized boating facilities are needed in Georgetown due to limited public access points for nonmotorized boating and paddle sports along the Georgetown waterfront. Increased popularity for nonmotorized water sports (canoeing, kayaking, rowing, paddle boarding, etc.), and insufficient capacity at current boathouse facilities that provide access to the river and related amenities (boat storage, concessions, access facilities, boat rentals, beach, and docks. The current configuration of the CCT and its connection to Georgetown does not provide safe and compatible access for pedestrians and bicyclists with motorized vehicles to and through the "zone."

In accordance with the National Environmental Policy Act of 1969 (NEPA), the NPS will be preparing an Environmental Assessment (EA) to evaluate these proposed actions. The EA will address the project background, the purpose and need for the proposed actions, a determination of environmental issues and potential impacts resulting from the alternatives considered (including the no action alternative), and public involvement and agency coordination. Concurrent to the NEPA process, the NPS will conduct consultation under Section 106 of the National Historic Preservation Act of 1966 (NHPA).

At this time, the NPS is announcing a public scoping meeting and a 30-day public scoping period to solicit public comments on preliminary alternatives for this proposal (see attached newsletter). The meeting will consist of an open house with a short presentation. NPS staff will be on hand to visit with you and answer questions.

The public scoping meeting will be held on Wednesday, February 4, 2015 from 6:00pm to 8:00 pm at the Palisades Public Library at 4901 V Street Northwest, Washington, DC 20007.

For further information or if you have special needs to be accommodated during this public open house please contact: Tammy Stidham, National Capital Region, at (202) 619-7474.

The public is invited to identify any issues or concerns they might have with the proposed project so that

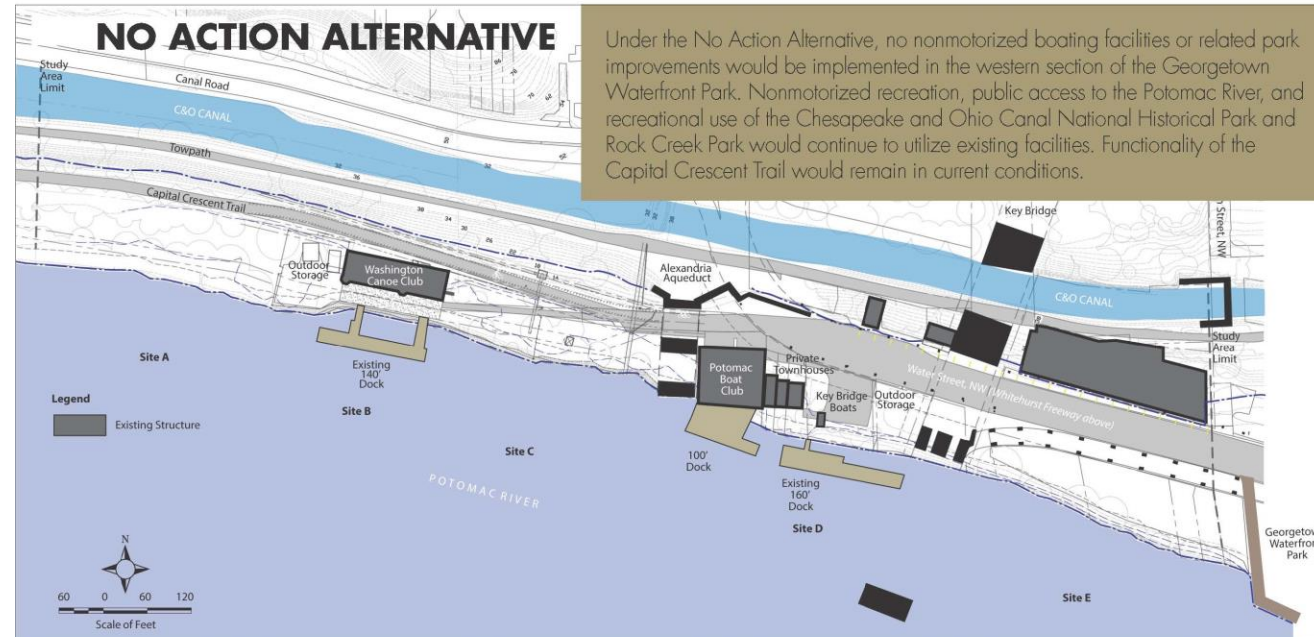
the NPS can appropriately consider them in the preparation of the Environmental Assessment. Comments may be provided either in person at the meeting or electronically at the National Park Service's Planning, Environment, and Public Comment website (<http://parkplanning.nps.gov/nmbzea>) or submit written comments to:

Tammy Stidham
Chief, Planning, Compliance & GIS
National Capital Region
National Park Service
ATTN: Georgetown Nonmotorized Boathouse Zone Development Plan
1100 Ohio Drive SW
Washington, DC 20242

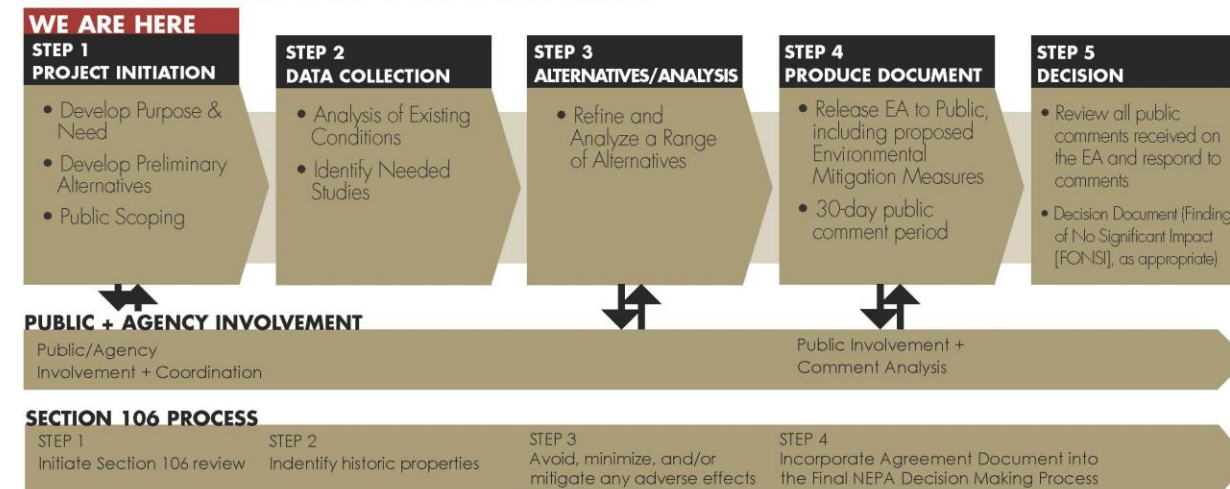
Please submit your scoping comments by February 19, 2015. Once the EA is developed, it will be made available for public review for a 30-day period. If you wish to be added to the park's mailing list for this or other announcements, please be sure to indicate that in your response.

APPENDIX 3: PUBLIC SCOPING NEWSLETTER

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NEPA + SECTION 106 PROCESS



HOW TO PROVIDE COMMENTS

You may provide your comments at the meeting, via the project website, or by completing and mailing the comment form to NPS. Please provide comments by **February 19, 2015**.

www.parkplanning.nps.gov/nmbzea

OR

ATTN: Georgetown Nonmotorized Boathouse Zone Development Plan
Tammy Stidham
1100 Ohio Drive SW
Washington, DC 20242

Rock Creek Park
Chesapeake & Ohio Canal National Historical Park

U.S. Department of the Interior
National Park Service



Georgetown Nonmotorized Boathouse Zone Development Plan

ENVIRONMENTAL ASSESSMENT AND
SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT

January 2015



You're Invited!

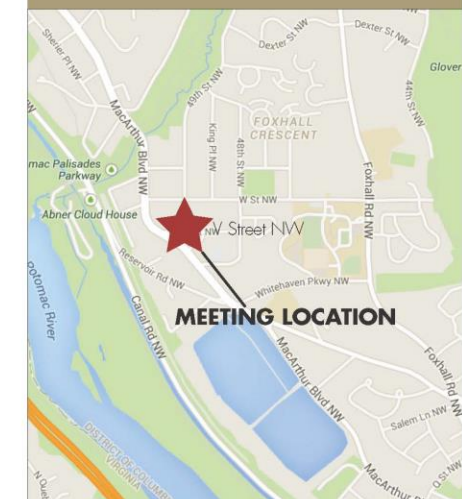
The National Park Service (NPS) is developing an implementation plan for nonmotorized boating facilities and related park improvements in the western section of Georgetown Waterfront Park in Washington, D.C. The 1987 Plan for the Georgetown Waterfront Park and the Chesapeake and Ohio Canal National Historical Park established a zone for boathouse facilities that has not yet been implemented. The need for such facilities was confirmed in the 2013 Feasibility Study for a Nonmotorized Boathouse Zone.

The proposed project area extends from 34th Street, NW within Georgetown Waterfront Park to approximately a quarter-mile upriver from Key Bridge. The project area encompasses both public and private land including portions of the Chesapeake and Ohio Canal National Historical Park, Rock Creek Park, and several privately-owned parcels (the Potomac Boat Club, several private residences, and a small parcel accessible from the shoreline only).

At this time, the NPS is announcing a public scoping meeting and a 30-day public scoping period to solicit public comments on this proposal. You are invited to attend the meeting and identify any issues or concerns you might have with the proposed project so that the NPS can appropriately consider them in the preparation of the Environmental Assessment.

MEETING INFORMATION

The public scoping meeting will be held:
Wednesday, February 4, 2015
6:00pm to 8:00 pm
Palisades Public Library
4901 V Street, NW
Washington, DC 20007



PURPOSE & NEED

The purpose of this project is to establish a Potomac River recreation zone that more fully supports non-motorized recreation, increases the public's access to the river, improves functionality of the Capital Crescent Trail (CCT) as it connects to the Georgetown Waterfront Park, and respects the historic character, natural resources, and existing recreational use of the Chesapeake and Ohio Canal National Historical Park and Rock Creek Park.

The 1987 Plan for the Georgetown Waterfront Park and the Chesapeake and Ohio Canal National Historical Park established a zone for rowers and paddlers along the Potomac River from 34th Street, NW to 1/4 mile upriver from Key Bridge within the District. The need for such facilities and for other park improvements was confirmed in the 2013 Feasibility Study for a Nonmotorized Boathouse Zone, which found that:

- There are limited public access points for non-motorized boating and paddle sports along the Georgetown waterfront;
- There is increasing popularity for non-motorized water sports (canoeing, kayaking, rowing, paddle boarding, etc.) within this area;
- Current boathouse facilities that provide access to the river, as well as other amenities (boat storage, concessions, access facilities, boat rentals, beach, and docks) in this vicinity are being run at full capacity and demand is expected to increase; and
- Current condition of the CCT and its connection to Georgetown does not provide safe and compatible transition for pedestrians and bicyclists as they move from the trail through the nonmotorized boathouse zone, and on to Georgetown Waterfront Park.

PRELIMINARY ALTERNATIVES

These preliminary alternatives will be further developed and refined with ideas that are collected during the public comment period. We want your input regarding these alternatives.

DEVELOPMENT OF PRELIMINARY ALTERNATIVES

Preliminary alternatives were developed during the EA internal scoping process taking into consideration known issues, public input gathered during the 2013 Feasibility Study for a Nonmotorized Boathouse Zone, past and present planning efforts, and alternative management approaches.

Issues, including:

- Physical site constraints
- Existing facilities and uses
- Balancing diverse user demands
- Vehicular and pedestrian access
- Safety and use conflict in the project area
- Land ownership

Past and Present Planning efforts, including:

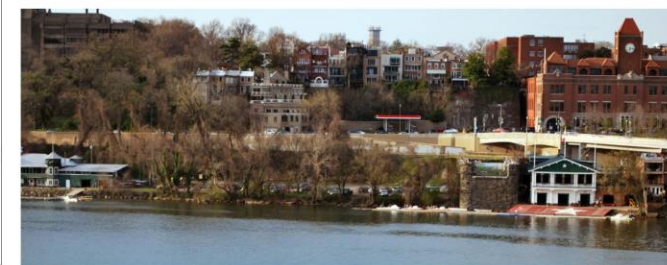
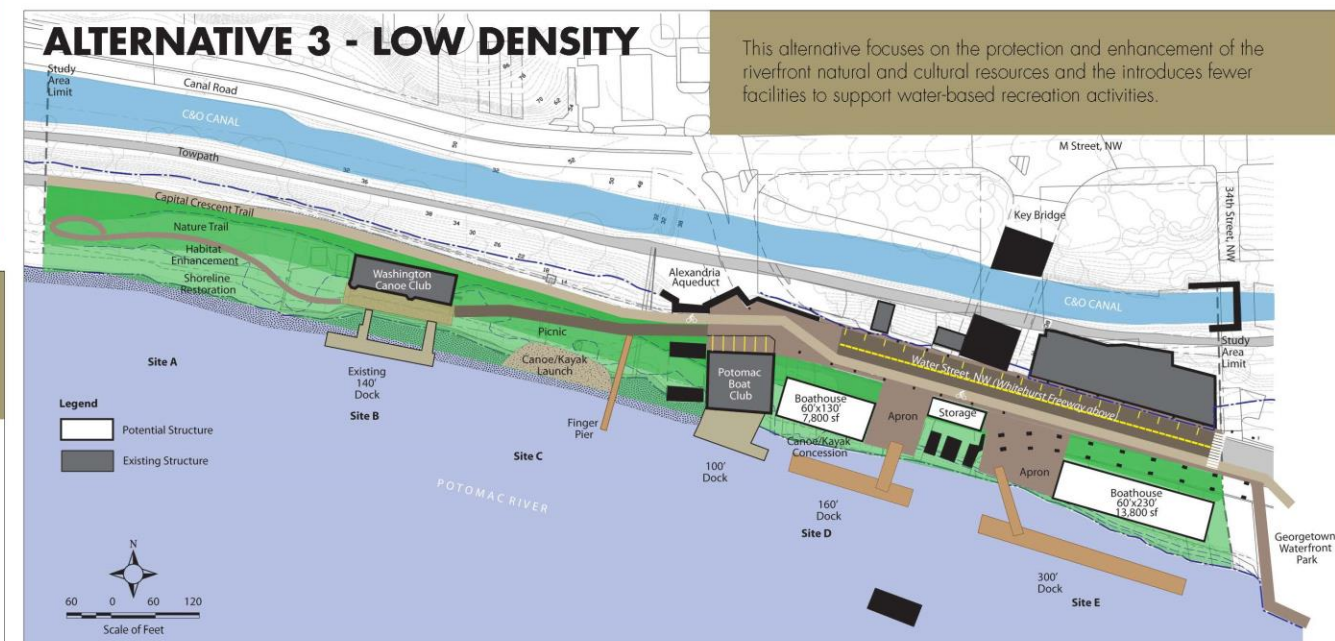
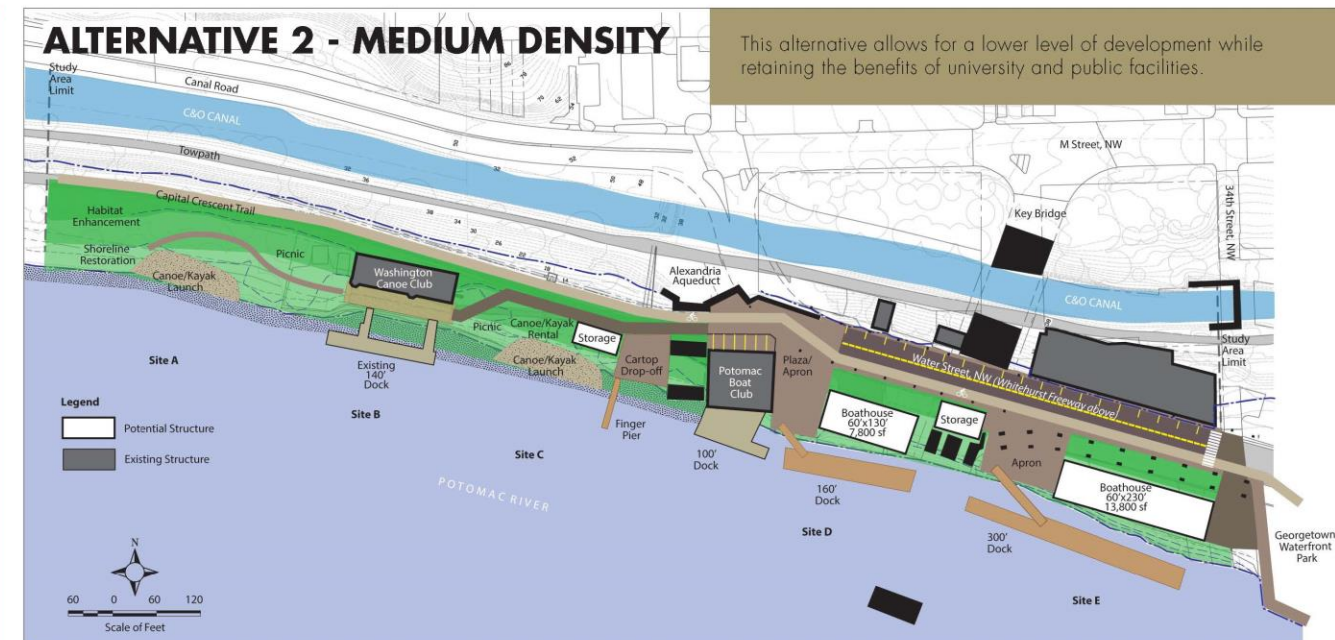
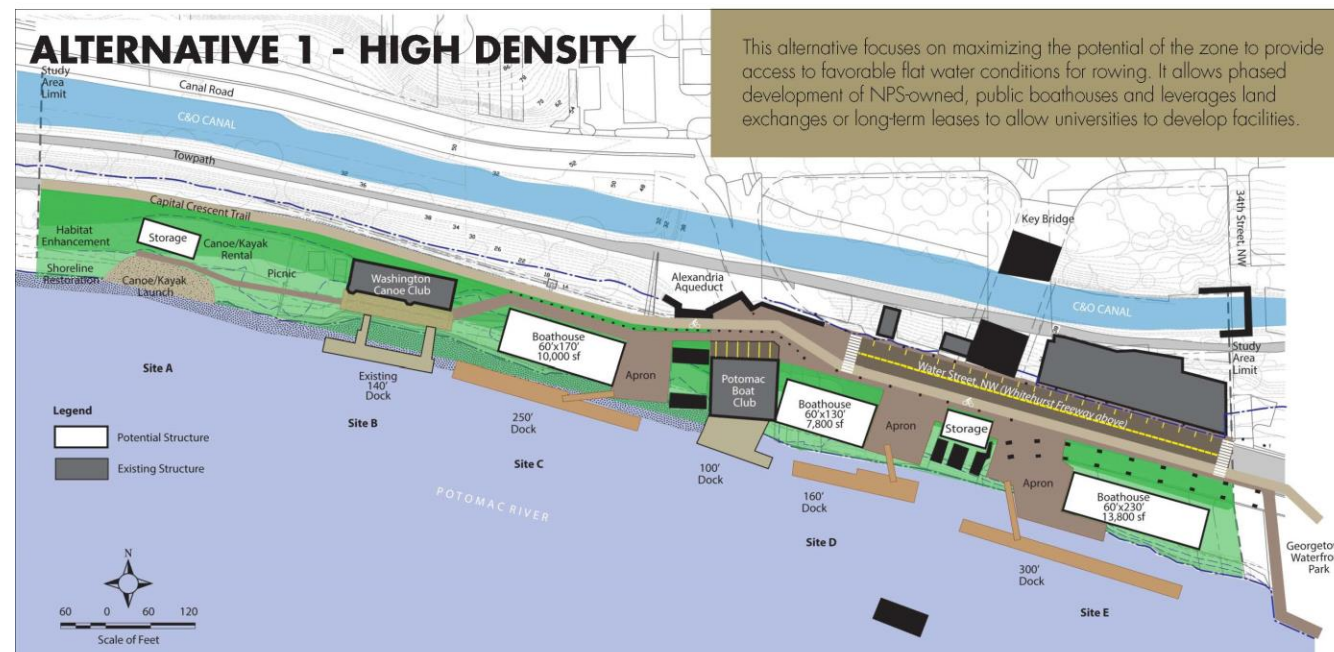
- Studies of Nonmotorized Boating Activities along the Georgetown Waterfront - 1985, 1989, 2000
- 1987 Plan for the Georgetown Waterfront Park and the Chesapeake and Ohio Canal National Historical Park - 1987
- Nonmotorized Boathouse Zone Feasibility Study - 2013
- Arlington Boathouse Environmental Impact Statement - ongoing

Public Comments received on the 2013 Feasibility Study, including input on:

- Use of the facilities
- Facility configuration and needs
- Development intensity

Alternative partnership/management, including:

- Cooperative management of new facilities by educational institutions
- Land management for new facilities (land exchanges, leases, partnerships, etc.)



APPENDIX 4: COPIES OF LETTERS FROM AGENCIES, ORGANIZATIONS, AND BUSINESSES

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**National
Capital
Planning
Commission**

401 9th Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel: 202.482.7200 Fax: 202.482.7272 www.ncpc.gov

IN REPLY REFER TO:
NCPC File No. 7660

April 10, 2015

Ms. Tammy Stidham
Chief Planning, Compliance and Geographic Information Systems
National Park Service
National Capital Region
1100 Ohio Drive, SW,
Washington, DC 20242

Re: NCPC Comments on the Environmental Assessment for Proposed Nonmotorized Boating Facilities, Rock Creek Park/Chesapeake & Ohio Canal National Historic Park, Washington DC

Dear Ms. Stidham:

Thank you for the opportunity to comment on the preparation of an Environmental Assessment (EA) for the Georgetown Nonmotorized Boathouse Zone Development Plan. Overall, the staff of the National Capital Planning Commission (NCPC) supports the purpose of the project which the National Park Service (NPS) states is to establish a Potomac River recreation zone that more fully supports non-motorized recreation, increases the public's access to the river, improves functionality of the Capital Crescent Trail (CCT) as it connects to Georgetown Waterfront Park, and respects the historic character, natural resources, and existing recreational use of the Chesapeake and Ohio (C&O) Canal National Historical Park and Rock Creek Park.

In general, NCPC staff supports components of Alternatives 2 and 3, as described in more detail below. Also, given the prominent location of the proposed project along the western section of the Georgetown waterfront, NCPC is interested in the potential impacts to this scenic shoreline that was established as a nonmotorized area in the 1987 Georgetown Waterfront Park Master Plan prepared by NPS and approved by NCPC.

The Federal Elements of the Comprehensive Plan for the National Capital include policies that support the purpose of the project. Specifically the Parks and Open Space Element encourages federal agencies to complete the Waterfront Park in Georgetown; preserve the C&O Canal National Historical Park as a legacy of inland waterway development and as a significant wildlife corridor; protect, restore and enhance the Potomac River as a great open space resource and recreational amenity.

The project is also consistent with the CapitalSpace planning concepts, some of which include connecting with rivers by linking together Washington's vibrant parks along the Potomac River, improving access and providing sustainable, diverse attractions to draw people to the waterfront.

While staff supports the purpose of the project to provide for nonmotorized recreational opportunities, improve access to the river, and reduce circulation conflicts, we offer the following comments on the proposed alternatives:

Capital Crescent Trail Connection

NCPC staff is supportive of improving the CCT connection to the western edge of the Georgetown Waterfront Park and separating bicycle, pedestrian and vehicular uses, as shown in all the alternatives; however, we request that NPS explore different trail alignments, avoid traffic circulation conflicts, and provide a smooth, clear and safe transition at the intersection of Alexandria Aqueduct and Water Street, NW. Staff recommends to explore the following regarding the CCT trail connection:

- Continue the trail parallel to the south edge of Water Street, NW, as shown in all the alternatives but avoid sharp angles and diagonal crossing in the middle of the street right-of-way, specifically at the terminus of Water Street, NW.
- Continue the trail alignment under the elevated Whitehurst Freeway support posts along the south side of Water Street, NW to connect to the existing trail at the western edge of Georgetown Waterfront Park.
- Coordinate with the District Department of Transportation (DDOT) regarding the following: removal of 90 degree parking along both sides of Water Street, NW and explore possibility of limited parallel parking; strategies to encourage the use of existing parking garages on K Street, NW; installation of sidewalks along the north and south side of Water Street, from 34th Street to the Alexandria Aqueduct; a wide sidewalk along the north side of Water Street may present opportunities for retail or café seating areas in the existing warehouses; study alternatives to relocate and integrate the existing Capital Bikeshare station at 34th and Water Street, NW into the new trail connection.
- Provide wayfinding signage indicating that Water Street, NW ends at the Alexandria Aqueduct, and clearly demarcate bicycle and vehicular lanes.
- Install interpretative signage to highlight historic elements such as the Washington Canoe Club, Potomac Boat Club, C&O Canal as well as the symbolic transition from city to nature by the arch of the historic Alexandria Aqueduct, and to guide inexperienced paddlers and rowers about the “rules of the river”.
- Improve connection between the CCT and the C&O Canal Towpath which are parallel but are at different elevations. The C&O canal can be accessed using the stairs alongside Key Bridge and connects to Virginia trails.

Public Boathouses Programs

Site A: NCPC staff supports preserving the natural scenic values of the Potomac Palisades as recommended in the 1987 Georgetown Waterfront Park Master Plan, and limiting development in Site A, as shown in alternative 3 – low density, and offers the following recommendations:

- Protect the scenic and ecological values of this section of the waterway.
- Restore, stabilize, improve and landscape degraded areas of the shoreline and remove non-native invasive species.
- Limit development along the shoreline due to physical site constraints related to access, utilities and narrow site conditions.

- Promote public access along the waterfront and provide opportunities for picnic areas, as shown in alternative 2, in addition to bird watching, photography and passive nature appreciation areas.
- Link open space along the waterfront to provide a continuous public open space system.
- Provide natural materials along the proposed nature trail.

Site B: NCPC staff recommends to renovate the historic Washington Canoe Club located in Site B, which is listed in the National Register of Historic Places, and integrate the building into the design to ensure that the shoreline of the Potomac River remains publicly accessible and that private boating clubs provide shoreline continuity through parks and promenades.

Site C: NCPC staff supports the proposed public Canoe/Kayak launch, picnic area, and finger pier as shown in alternative 3, and recommends to improve the storage area under the Aqueduct arch. Given the limited available developable land, traffic, accessibility, setback requirements and utility conflicts, including an existing combined sewer overflow discharge point, staff discourages large paved areas along the Potomac River, such as the proposed car top launch temporary loading area as shown in alternative 2. Staff also discourages the proposed boathouse as shown in alternative 1 in order to maintain river views, further define the natural character of the west side of the aqueduct, limit circulation conflicts, and improve safety.

Site D: NCPC staff supports alternative 2, which provides a plaza/apron for temporary loading to the east side of the existing Potomac Boat Club, a new 160-foot dock, a 7,800 square-foot boathouse and storage area in the space below the Key Bridge supports which is currently used as DDOT staging area. NCPC staff recommends to provide continuous river access along the private Potomac Boat Club through a promenade to ensure equitable access to the river, and to use easements, donations, purchases, exchanges, or other means to acquire land and enhance parks and open space along the waterfront. Staff recommends to use a different pavement treatment along the plaza to define the end of Water Street, NW and emphasize the threshold between urban and wilderness area. The plaza/Apron area can be used as a staging area for regattas, other boating events, and a bus drop-off area.

Staff discourages the proposed boathouse locations in alternatives 1 and 3, since they are too close to the existing historic Potomac Boathouse Club and will obstruct views to the river.

Site E: NCPC staff supports the proposed configuration as shown in alternative 2, which includes a 13,800 square-foot boathouse, an apron for temporary loading adjacent to Key Bridge, and a 300-foot long dock. Staff encourages NPS to maximize green open areas to the east of the proposed boathouse, rather than providing a paved area as shown in alternative 2. In addition, staff encourages NPS to explore how the area to the east of the proposed boathouse could be connected and integrated into Georgetown Waterfront Park.

In general, staff also recommends that the number of car top launch /temporary loading areas be minimized and located on the east side of the Alexandria Aqueduct in order to maintain the unique

identity between natural scenic area to the west and urban area to the east side of the Aqueduct as described in the 1987 Master Plan.

NCPC staff recommends that NPS further coordinate with the District of Columbia Department of Transportation (DDOT), District Department of the Environment (DDOE), District of Columbia Water and Sewer Authority (DC Water) and other agencies to comply with local streetscape design, maintenance setbacks, utility easements and stormwater standards. We also request that NPS evaluate the use of permeable materials for trail construction and any new paving areas.

We look forward to continued involvement in the NEPA and Section 106 processes, and the design of this project. The proposed project is required to be submitted to NCPC for formal review in accordance with the National Capital Planning Act. NCPC requests to be a cooperating agency on the EA to satisfy our independent responsibility under the National Environmental Policy Act. In addition, NCPC staff recommends that the NPS schedule an early consultation meeting to discuss the project submission.

Please see our website, at www.ncpc.gov, for the Comprehensive Plan for the National Capital and for our submission policies and requirements. If you have any questions regarding our comments or our submission requirements, please contact Vivian Lee at (202) 482-7238 or vivian.lee@ncpc.gov.

Sincerely,

A handwritten signature in blue ink that reads "Lucy Kempf". The signature is written in a cursive, flowing style.

Lucy Kempf
Director, Urban Design and Plan Review

US EPA Region III—Correspondence 188

From: "Uybarreta, Thomas" <Uybarreta.Thomas@epa.gov>

Date: April 9, 2015 at 1:45:43 PM MDT

To: "tammy_stidham@nps.gov" <tammy_stidham@nps.gov>, "tammy_stidham@nps.gov" <tammy_stidham@nps.gov>

Cc: "Rudnick, Barbara" <Rudnick.Barbara@epa.gov>, "Miller, Linda" <miller.linda@epa.gov>

Subject: Scoping request for the Georgetown Nonmotorized Boathouse Zone Development Plan

Ms. Stidham

Thank you for the opportunity to submit scoping comments for the Environmental Assessment (EA) being prepared for the Georgetown Nonmotorized Boathouse Zone Development Plan in accordance with the National Environmental Policy Act (NEPA). EPA is responding to the request for comments on the referenced project per our authorities under NEPA. We have included the following comments for your consideration in the development of the EA.

With the increase of the public's access to the Potomac River, the EA should describe potential impacts that the project may have to the existing natural and human environment. EPA encourages the identification of existing submerged aquatic vegetation and the potential for adverse impacts to resources such as wetlands, water quality, existing natural shorelines, aquatic resources and forest cover. EPA suggests that the EA describe how impacts to these natural resources will be avoided or minimized. EPA advocates coordinating with other appropriate federal, state and local resource agencies on possible impacts to wetlands, streams, historic resources and/or rare, threatened and endangered species.

Air quality and community impacts from the project and its construction should be evaluated and minimized. This should include noise, light and potential traffic impacts during construction and the final project.

Environmental Justice (EJ) should also be evaluated, including the identification of potential communities of concern, and meaningful and timely community involvement, public outreach, and access to information. Consideration should also be given to all potential impacts to at-risk populations, as well as consideration to sensitive subpopulations, possibly including elderly, children and others. Community impacts should also be avoided, minimized and mitigated.

EPA would like the National Park Service to consider climate change in the development of the EA. Climate change will affect rainfall, storm surges, and flooding. These topics should be discussed throughout the EA as they are a concern for many future projects. The EA should also discuss any increase in impervious surface, increase of stormwater from the final project and its

construction as well as mitigation techniques used to reduce or control stormwater runoff.

If there are any questions, concerns, or need for clarification concerning the above please feel free to contact me at Uybarreta.Thomas@epa.gov or give me a call at 215-814-2953.

Thank you for your consideration

Tom

Thomas G.S. UyBarreta

US EPA Region III

Environmental Protection Specialist, EAID

uybarreta.thomas@epa.gov

1650 Arch St. (3EA30)

Philadelphia, PA 19103

215.814.2953

To protect human health and the environment.

District of Columbia Office of Planning—Correspondence 187

District of Columbia Office of Planning



February 4, 2015

Tammy Stidham
Chief, Planning, Compliance & GIS
National Capital Region
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

Re: Georgetown Nonmotorized Boathouse Zone Development Plan

Dear Tammy:

Thank you for your letter of January 21 regarding the re-opening, in accordance with NEPA and the NHPA, of study and consultation for the proposed nonmotorized boating facilities in the western section of Georgetown's Waterfront Park. We have few comments at the moment, as we wish the public and the Park Service to weigh in on the appropriate balance between boat storage/launching, other uses, and historic and environmental values.

Based on past experience, we think that the abandonment of a boathouse upriver of the Washington Canoe Club is a positive step toward consensus, as well as more consistent with the previously understood western boundary of Waterfront Park. We support the removal of the three "noncontributing" townhouses adjacent to the Potomac Boat Club in order to expand recreational uses. We would encourage the employment of permeable paving, as well as the limitation of paving where it may be expanded, as for the apron on Site C in Alternative 1.

We have a couple of questions at this point. One is about the nature of the facilities labeled as storage. Are these intended to be open canoe and kayak racks similar to those at Belle Haven Marina?

We are also interested to know what the Park Service envisions for the third dimension of each boathouse, its height. There may well be efficiency in some uses of upstairs space. The previously proposed Georgetown University boathouse may have contained spaces that were not necessarily ancillary to the crew use, and these added to its bulk, which was controversial in some quarters. Different degrees of bulk may have differing effects on historic resources, such as the adjacent historic boathouses. Bulk can be ameliorated to a degree through massing and scale-giving detail, but we would encourage that the ultimate construction be closely related to the ostensible sport purpose of the undertaking, with a reasonable amount of programmatic growth potential built in.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Tim Dennee', is written over a faint, circular official stamp.

Tim Dennee
Architectural Historian



District Department of Transportation

Government of the District of Columbia

Department of Transportation



2015 JUL -6 PM 1:49

d. Office of the Director

May 28, 2015

Ms. Tara Morrison
Superintendent
Rock Creek Park National Park Service
National Capital Region
1100 Ohio Drive, SW
Washington, D.C. 20242

Mr. Kevin Brandt
Superintendent
Chesapeake/Ohio Canal National Historic Park
Rock Creek Park National Park Service
National Capital Region
1100 Ohio Drive, SW
Washington, D.C. 20242

Dear Ms. Morrison and Mr. Brandt:

Thank you for your letter regarding the National Park Service's (NPS) project, *Environmental Assessment for Proposed Non-motorized Boating Facilities at Rock Creek Park and Chesapeake & Ohio Canal National Historic Park*. The District Department of Transportation (DDOT) remains committed to working with NPS to improve multi-modal travel in the project area.

DDOT's representative on the project, Mr. Jim Sebastian, Bicycle Coordinator, attended the March 26, 2015 NPS meeting on this project. As he noted at the meeting, DDOT's main concern is the connection of the Capital Crescent Trail to the DDOT-funded trail through the Georgetown Waterfront Park, some of which will travel through DDOT public space. DDOT is committed to working with you to maximize the safety and convenience of the various Environmental Assessment alternatives for cyclists, pedestrians and motorists. Mr. Sebastian, along with other DDOT staff, will work with Ms. Tammy Stidham at NPS to arrange a field visit to discuss the configuration of the trail, roadway, sidewalks and other public space uses.

Thank you, again, for your letter. If you have any additional questions or concerns, then please do not hesitate to contact Mr. Sebastian at 202-671-2331 or via email at jim.sebastian@dc.gov.

Sincerely,

Leif Dorsmjo
Director



DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY | 5000 OVERLOOK AVENUE, SW | WASHINGTON, DC 20032

February 27, 2015

Tammy Stidham
Chief, Planning, Compliance, & GIS
National Capital Region
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

RE: Georgetown Nonmotorized Boathouse Zone Development Plan Environmental Assessment
DC Water Scoping Comments

Dear Ms. Stidham:

The District of Columbia Water and Sewer Authority (DC Water) appreciates the opportunity to provide input on the National Park Service (NPS) Nonmotorized Boathouse Zone (NMBZ) Environmental Assessment (EA). DC Water previously coordinated with NPS regarding this project during development of the NMBZ Feasibility Study and we look forward to continuing this coordination as the project moves forward. The following comments are provided for the NMBZ EA Public Scoping process:

1. Protection of Existing Infrastructure

DC Water currently maintains critical infrastructure in the proposed NMBZ Project Area (see attached Figure 1). Existing assets within the Project Area include a water main and the Upper Potomac Interceptor (UPI), Upper Potomac Interceptor Relief Sewer (UPIRS), and their associated access manholes. These sewer facilities serve a large number of customers in the western portion of the District of Columbia, as well as suburban customers in Montgomery County, Maryland, and Fairfax and Loudoun Counties, Virginia. Combined Sewer Overflow (CSO) 028 is within the Project Area just west of the Alexandria Aqueduct abutment. The Project Area is also a key access point for facilities to the west, between the C&O Canal and Potomac River, including CSO 029 (approximately 750 feet west of the project area) and additional portions of the UPI and UPIRS. The NMBZ EA should consider how DC Water will access these facilities for regular and emergency maintenance, repair, and improvement.

2. Coordination with Future DC Clean Rivers Project Facilities

DC Water is also in the process of implementing its Combined Sewer System Long Term Control Plan (LTCP), also known as the DC Clean Rivers Project. The purpose of this project is to control CSOs into the District's waterways, which occur when the existing combined sewer system's capacity is exceeded during storm events. The project will improve water quality and reduce trash in the District's receiving

dcwater.com

Tammy Stidham
February 27, 2015
Page 2 of 3

waterbodies through the reduction of untreated discharge from the combined sewer system. In addition, the project is required by the 2005 Federal Consent Decree entered into by DC Water, the District of Columbia, the U.S. Department of Justice, and the U.S. Environmental Protection Agency.

The Potomac River Tunnel (PRT) project, currently in the planning phase, is the portion of the DC Clean Rivers Project which will provide control for the CSOs along the Potomac River, including CSOs 027, 028, and 029 (see attached Figure 2). The PRT will consist of a storage tunnel and supporting infrastructure, potentially including diversion facilities connecting to existing sewers, drop shafts, overflow structures, and ventilation control facilities. Construction and maintenance of the PRT facilities associated with CSOs 027, 028, and 029 may potentially occur in or near the NMBZ Project Area and should be considered in the NMBZ EA. The NMBZ implementation should provide space to construct and maintain the tunnel and associated surface facilities in this area. DC Water and NPS are currently co-lead agencies in the development of an Environmental Impact Statement for the PRT project.

DC Water has proposed modifications to the existing LTCP to include Green Infrastructure (GI) and Sewer Separation for the Potomac River CSOs west of Rock Creek. In the proposed plan, CSOs 027, 028, and 029 would be controlled by implementing GI practices throughout their sewer sheds. While this modification may reduce potential impacts to the NMBZ Project Area, new facilities in the Project Area may be proposed as part of the project planning process and existing facilities will remain in service.

DC Water looks forward to continuing coordination with NPS regarding its existing and proposed infrastructure in the NMBZ Project Area. If you have any questions or need additional information, please do not hesitate to contact Angela Essner at Angela.Essner@dcwater.com or by phone at (202) 787-4417.

Sincerely,



Moussa Wone, Ph.D., PE
Design Manager, DC Clean Rivers Project

c: Joel Gorder, National Park Service
Carlton Ray, Director, DC Clean Rivers
John Cassidy, DC Clean Rivers

Angela Essner, DC Clean Rivers
Brandon Flora, DC Clean Rivers
Robin Griffin, Stantec

Attachments:

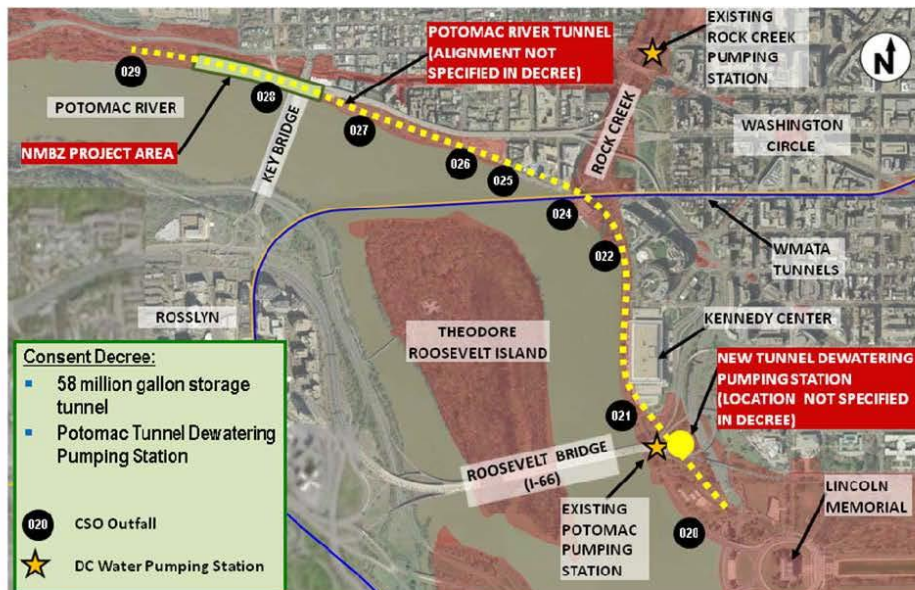
Figure 1 – Existing DC Water Infrastructure in the NMBZ Project Area Vicinity

Figure 2 – Conceptual Potomac River Tunnel Schematic (per Existing Consent Decree)

dcwater.com



Figure 1 – Existing DC Water Infrastructure in the NMBZ Project Area Vicinity



**Figure 2 – Conceptual Potomac River Tunnel Schematic
 (Per Existing Consent Decree)**

Advisory Neighborhood Commission 3D—Correspondence 132

TRANSMITTAL SHEET

TO: National Park Service

FROM: Thomas M. Smith, Chair
Advisory Neighborhood Commission 3D

DATE: March 5, 2015

RE: Scoping Comments

At its regularly scheduled and noticed meeting of March 4, 2015, with a quorum present at all times, Advisory Neighborhood Commission 3D voted unanimously 10-0-0 to submit the following Scoping Comments in to the record on the NPS Environmental Assessment for the Georgetown Nonmotorized Boathouse Zone.

ANC3D Resolution in Support of Submitting Comments
on the Scoping Phase of the NPS Environmental Assessment for the Georgetown Nonmotorized Boathouse Zone Development Plan

WHEREAS, ANC 3D is contiguous to the Chesapeake and Ohio Canal National Historical Park (C&OCNHP);

WHEREAS, ANC 3D participated in previous public forums as well as the 2013 Feasibility Study for a Nonmotorized Boathouse Zone;

WHEREAS, the National Park Service (NPS) is engaged in the preparation of the Environmental Assessment and Section 106 of the National Historic Preservation Act compliance for the Georgetown Nonmotorized Boathouse Zone Development Plan; and

WHEREAS, the NPS is engaged in the scoping process prior to preparing its Environmental Assessment, and as such, has presented alternatives, and solicited comments from interested parties by March 6, 2015.

NOW THEREFORE BE IT RESOLVED that ANC 3D wishes to submit comments to the NPS on the scoping phase of its Environmental Assessment and that such comments shall reflect the following guiding principles:

The environmental assessment and evaluation of each alternative should to the greatest extent feasible:

1. Reflect the minimum amount of development consistent and commensurate with the "purpose" and "need", as stated by the NPS in its scoping presentation, for improvements to nonmotorized boating facilities and for other park improvements;
2. Ensure that the Capital Crescent Trail and its connection to Georgetown provides a safe and compatible transition for pedestrians and bicyclists as they move from the trail through the nonmotorized boathouse zone to the Georgetown Waterfront Park; and
3. Provide assurance for the preservation and protection of views and vistas, enhance visitor use and experience, minimize the impact on traffic, promote wildlife habitat, safeguard cultural resources, particularly historic districts and landscapes, and ensure health and safety. Committee of 100

National Parks Conservation Association—Correspondence 165

March 6, 2015

Ms. Tammy Stidham, Chief
Planning, Compliance & GIS
National Park Service
1100 Ohio Drive, SW
Washington, DC 20242

Dear Ms. Stidham:

On behalf of the nonpartisan National Parks Conservation Association (NPCA) and our more than one million members and supporters nationwide, I am writing to you regarding the National Park Service's (NPS) plan for preparing the Environmental Assessment (EA) for the Non-motorized Boathouse Zone Development Plan. The draft EA should address issues and concerns regarding impacts on historic, cultural, and natural resources, and should recommend as a preferred alternative one that protects the Chesapeake & Ohio Canal National Historical Park from private development.

The Georgetown waterfront in Washington, D.C. along the Potomac River serves as a vital gateway both to C&O Canal National Historical Park and Rock Creek Park. C&O Canal National Historical Park is one of the top 10 most visited national parks in the United States, with more than 5 million annual visitors who enjoy the park's natural beauty, historic resources, and outdoor recreational amenities. Rock Creek Park provides a forest oasis in the heart of our nation's capital.

NPCA supports Alternative 3-a low density approach:

- We are concerned about the potential impacts of new development that would be allowed by Alternatives 1 and 2 upon the natural, historic, and cultural resources of the area, as well as upon the scenic views within the Potomac Gorge.
- Development at Site A and Site C, as proposed by both the "high" and "medium" density alternatives, would create significant potential impacts from new construction - - to the detriment of this valuable historic area within C&O Canal National Historical Park.
- Development at Site D and Site E, as proposed by the "low" density alternative, appears to be compatible with the current use of existing facilities within the boundary of Rock Creek Park.
- Alternatives 1 & 2 should be eliminated, as they would fail to protect the park's cultural resources, and would degrade the visitor experience upon entering C&O Canal National Historical Park.

As NPS considers potential impacts as a result of preparing the Non-motorized Boathouse Zone Development Plan, we ask that issues related to the hydrologic and hydraulic impacts of proposed development are studied. This segment of the Potomac River is a critical zone for the protection of tidal wetlands for plant and animal habitat, flood control, and storm water management. For any new development being considered, the impacts on the river's soils, water quality, water flows, vegetation, wildlife, habitat, and storm water management should be considered.

We also request that any alternative that would allow new development or facilities within C&O Canal National Historical Park or Rock Creek Park require robust public access to the waterfront, both for quiet enjoyment, and for recreational purposes-including use of personal paddle craft:

- Public access to the Potomac River in Washington, D.C. is limited, and NPS has identified the Potomac River as a focal priority for increasing public water access.
- Any alternative should require public water access to support implementing the NPS Potomac River Segment Plan-and help reach the goal of Executive Order 13508 (Chesapeake Bay Protection and Restoration) issued by President Obama, of which a key part is providing 300 new public water access sites by 2025.

While C&O Canal National Historical Park's towpath and the Capital Crescent Trail are heavily used and

enjoyed recreational destinations, NPS must not promote recreational activities at the expense of conservation of natural and cultural resources, public safety, and quiet enjoyment by park visitors.

As established in C&O Canal National Historical Park's 1971 enabling legislation, the specific purposes of the park are to "preserve and interpret the historic and scenic features of the Chesapeake and Ohio Canal, and to develop the potential of the canal for public recreation." Development of facilities for recreation should be done in a way that avoids impacts to the park's historic and natural resources.

We appreciate your commitment to maintaining C&O Canal National Historical Park, Rock Creek Park, and the Potomac River as unique cultural, natural, and recreational assets in the Mid-Atlantic region. Thank you for including these scoping comments in preparation of the EA for the Georgetown Non-motorized Boathouse Development Plan.

Sincerely,

Edward Stierli
Field Representative, Chesapeake & Virginia Program

Georgetown Business Improvement District—Correspondence 164



March 6th, 2015

Tammy Stidham
Chief, Planning, Compliance & GIS
National Park Service
1100 Ohio Drive SW
Washington, DC 20242

Comments On The Preliminary Alternatives for The Georgetown Non-motorized Boathouse Zone Development Plan

The Georgetown Business Improvement District (GBID) has a strong interest in the ongoing NMBZDP, and is participating as an affected consulting party. Sites C, D, and E are all within the GBID boundaries as established by our enabling legislation with the District of Columbia, and the activity generated by these boathouses is of strong interest to us for the greater economic vitality and success of Georgetown.

With these things in mind, we have been operating under the principle that we want to encourage more intensive activity in the neighborhood without exacerbating negative impacts on the residential population. The GBID advocates for these positions as NPS continues the NMBZDP:

- 1) We support more boathouses along the Georgetown Waterfront.
- 2) We support efforts of the universities to build boat houses in the NMBZ because:
 - a. Space on the river for rowing is constrained, and the preferred rowing area is upstream from Rock Creek
 - b. The NMBZ is proximate to the campuses so that students will not need to drive to get to the boathouses
 - c. University boathouses will free up space in Thompsons Boat Center for scholastic rowers, paddlers, and car-top access
- 3) NPS should leave all of its options open by planning for the maximum number of potential boathouse sites in their alternatives analysis – so that it has the ability to approve fewer boathouses, but is not constrained by a cap at the conclusion of the NMBZDP.
- 4) NPS should consider transportation options for specific users to get to and from the boathouse zone, and it should work hard to develop additional plans and facilities both inside and outside of the NMBZ study area to accommodate all the paddlers and rowers who need river access while minimizing new access and congestion issues in the Georgetown Waterfront district.
- 5) The GBID looks forward to working with the NPS and other community stakeholders to develop and implement a workable plan for expanded boathouses and river access in the coming years.

6) The GBID supports NPS and DDOT's joint efforts to better organize the 3400 – 3600 blocks of Water Street in order to better accommodate people on foot and on bicycles, including those using mobility aids. This corridor is heavily traveled by those users as it is the junction between several popular multi-use trails and regional attractions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe Sternlieb", is written over the typed name and title.

Joe Sternlieb
CEO

Committee of 100 on the Federal City—Correspondence 131

March 2, 2015

RE: NPS Scoping Comments for the Preparation of the Environmental Assessment for the Georgetown Nonmotorized Boathouse Development Plan

The Committee of 100 on the Federal City (C100) was founded in 1923 to act as a force of conscience in the evolution of the Nation's Capital City. It was formed to sustain and safeguard the fundamental values - derived from the tradition of the L'Enfant Plan and the McMillan Commission - that give the nation's capital so much of its distinction, its beauty and its grace as a community. The Committee is dedicated to providing responsible oversight in all pertinent aspects of community development. These include parks and conservation, historic preservation, visual planning and architecture, land use regulation and renewal planning, pollution control and environmental protection, and transportation planning.

The Committee is pleased to submit the following scoping comments on the meeting for the preparation of an Environmental Assessment and Section 106 of the National Historic Preservation Act (NHPA).

The Citywide Elements of the Comprehensive Plan, Parks, Recreation and Open Space Element Policy (PROS-3.2.8) provides the following guidance on the Upper Potomac Waterfront:

Partner with the National Park Service and other federal agencies to conserve open space along the Potomac waterfront and to protect the wooded and scenic qualities of the Potomac Palisades and adjacent islands and shoreline, including the creation of the Georgetown Waterfront Park. 813.11

The Committee has participated in the development of a nonmotorized boathouse zone for the Georgetown Waterfront Park and the Chesapeake and Ohio Canal National Historical Park (C&OCNHP) ever since a zone for rowers, paddlers and wind surfers was identified along the Potomac River from 34th Street to one-quarter mile upriver from Key Bridge. In that same spirit, C100 continues to advocate for the prohibition of private development within the C&OCNHP and supports the preservation of the natural, historic and cultural resources of the area as well as the viewshed within the Potomac Gorge. Over time the demands for facilities and related infrastructure improvements have increased as confirmed by the 2013 Feasibility Study, to which C100 submitted comments. This increase in demand for greater access to the river should not compete with other activities such as walking and biking, nor with NPS' responsibility to protect and preserve the unique resources of the C&OCNHP.

Careful and thorough consideration must be given in the Environmental Assessment to the potential impacts in the zone from private development, congestion, safety and traffic issues related to the project. The Committee supports Alternative 3 - low density, which would keep all new construction between 34th Street and the Potomac Boat Club.

We appreciate the opportunity to submit comments for the scoping phase for the preparation of an Environmental Assessment and Section 106 of the NHPA for the Georgetown Nonmotorized Boathouse Development Plan and we applaud the NPS for including the NHPA Section 106 provision in the study. As we have stated in the past, in our letter to NPS of January 18, 2008 re another proposal, "A project affecting two separate National Parks, adjacent to National Historic Landmarks, in a community that is itself a National Historic Landmark on an American Heritage River, demands the rigor of protections offered by NHPA.

Nancy J. MacWood
Chair

C&O Canal Association—Correspondence 23

On behalf of the C&O Canal Association, I welcome the opportunity to comment on the scoping phase of the Environmental Assessment on the Georgetown Nonmotorized Boathouse Zone Development Plan, and on the related review under the National Historic Preservation Act.

The Association is an independent citizens organization with a mission that includes preserving the natural and historical environment of the C&O Canal and the Potomac River shoreline. We support the National Park Service in its work to conserve and maintain the towpath and the scenic open spaces within the C&O Canal NHP. We are therefore pleased to note that the National Park Service presentation on February 4 declared that the development plan intends to respect "the historic character, natural resources, and existing recreational use" of the canal park. It is important to point out, however, that development plan's preliminary High Density Alternative is inconsistent with those declared limitations.

That High Density Alternative calls for establishment at Site C within the canal park of a 10,000 square foot boathouse with no height limitation. The boathouse complex would include a 250 foot dock and a large apron immediately adjacent to the historic Alexandria Aqueduct. Such construction would completely alter the character of this area, which lies just inside a popular entrance point to the National Historical Park. It would degrade its scenic quality and environmental value, and would transform the existing recreational use of the area, particularly if used for academic team rowing.

We also note that the High Density Alternative permits land exchanges to allow development by universities. If applied to Site C, such an exchange would be a misuse of the National Historical Park's authority to engage in land exchange, which is intended to enhance the park. The canal park exists to benefit the public, and no part of it should be converted to private use.

The Medium and Low Density Alternatives include proposals for changes within the C&O Canal NHP such as habitat enhancement, shoreline restoration, canoe/kayak launching, and a finger pier. Steps of this kind may represent highly positive improvements, provided their design and scale is compatible with the existing historic and natural values of the area. Further information will be needed on such issues as the environmental effects of using beaches, rather than docks, for boat launching.

The Medium Density Alternative's plan for a storage facility and a cartop drop-off area has the potential to crowd the narrow access point to the canal park. The same Alternative's inclusion of a second canoe/kayak launching area upriver from the Washington Canoe Club seems an unnecessary intrusion in a wooded area where the nature trail proposed under the Low Density Alternative would be more appropriate. For these reasons, the Association prefers the Low Density approach.

The demand for greater boating access in Georgetown can be responsibly accommodated in ways that will respect the unique resources of the C&O Canal NHP. We hope that the current Environmental Assessment process will serve that goal.

Sincerely,

Dward Moore, President
C&O Canal Association

Defenders of Potomac River Parkland—Correspondence 31

Scoping Letter to National Park Service, from Defenders of Potomac River Parkland, www.savethecanal.org 2/19/15:

On behalf of Defenders of Potomac River Parkland, a coalition of more than 20 conservation, recreation, historic and civic organizations representing thousands of individuals, I am pleased to provide these scoping comments for the preparation of the EA for the Georgetown Nonmotorized Boathouse Zone Development Plan.

Issues and concerns:

1. Protect the C&O Canal National Historical Park from private development.
2. Preserve the sensitive natural, historic and cultural resources of the C&O Canal NHPark; also the viewshed within the Potomac Gorge.
3. Eliminate from consideration the "High Density" alternative due to potential significant impacts from new construction at sites A and C within the C&O Canal NHPark.
4. Team rowing facilities should be located outside of the C&O Canal NHPark on degraded land in need of redevelopment.
5. Address potential safety and traffic issues during/after construction at the entrance to the C&O Canal NHPark/Capital Crescent Trail/DCWater sewer access area.
6. Address issues related to hydrologic and hydraulic impacts of proposed development, protection of wetlands, and stormwater management.
7. Include this new alternative: instead of multiple new boathouses, build only one new boathouse at 34th St., and share it with university, high school and public programs (like nearby Thompson's Boat Center). Use surrounding land for storage and launching needs.
8. Ensure public access to waterfront/public boating use of any new facilities within the C&O Canal NHPark.
9. Ensure that NPS does not promote recreational activities at the expense of conservation of natural resources, safety and park visitor experience.
10. If NPS considers land swaps, conduct the process transparently and with public accountability, including making public the valuations used for the swaps.
11. Accommodate walking, bicycling, and paddling sports on an equal basis with team rowing.

Thank you for including these scoping comments in the preparation of the EA for the Georgetown Nonmotorized Boathouse Development Plan.

Sincerely,

Sally Strain, Coordinator, Defenders of Potomac River Parkland www.savethecanal.org

Member organizations are: American Canoe Association; American Hiking Society; American Whitewater Association; Appalachian Mountain Club; Audubon Naturalist Society; Canoe Cruisers Association; C&O Canal Association; Center for Biological Diversity; Clean Water Action; Coalition for the Capital Crescent Trail; DC Environmental Network; East Coast Greenway Alliance; Global Green USA; National Parks Conservation Association; Potomac Appalachian Trail Club; Potomac Conservancy; Potomac Heritage Trail Association; Potomac Pedalers Touring Club; Quantico Orienteering Club; Rails to Trails Conservancy; Sierra Club, D.C. Chapter; Washington Area Roadskaters; Washington Canoe Club; Western Lands Project

Coalition for the Capital Crescent Trail—Correspondence 111

On Feb. 4, 2015 the National Park Service (NPS) presented a public scoping meeting on the proposed Georgetown Non-motorized Boathouse Zone Development Plan (NMBZDP). The Coalition for the Capital Crescent Trail (CCCT) would like to submit the following comments on the basic concepts depicted in the three alternatives: High, Medium, and Low Density. The success or failure of this project is highly dependent on getting the details right, and the CCCT looks forward to working with NPS as the specifics are being discussed. This is particularly true with respect to the routing of the CCT extension along Water Street, as well as any trail impacts related to specifics of the NMBZDP inside the C&O Canal National Historical Park (C&ONHP).

1) We are in agreement with the NPS on the need for expanded non-motorized boating options in the proposed zone, and feel that the animation which will come to that stretch of Water Street from a well thought out NMBZDP can be positive for both boaters and trail users.

2) The CCCT is pleased with the current direction of this plan, particularly its movement away from locating a large university boathouse inside the C&ONHP on Site A, and its intention of improving the Capital Crescent Trail (CCT) along Water Street between 34th Street and the Aqueduct Bridge arch.

3) Regarding "Alternative 1 - High Density", we are concerned that the previous design problems for Site A may be repeated at Site C, also located inside the C&ONHP, between the Washington Canoe Club (WCC) and the Aqueduct Bridge structure. That boathouse is shown with a nominal footprint of 10,000 sf (60' X 170'), which appears too big for the land available at that site without compromising the functioning of the CCT.

4) Further, given that height restriction is not addressed in the proposal, we are concerned about the potential for a structure being proposed for Site C rising above the existing physical features (WCC, Towpath, Aqueduct remains).

5) At this point in the process, the CCCT has a strong preference for options shown in Alternatives 2 & 3 (Medium & Low Density). Those approaches remove the potentially problematic boathouse on Site C from consideration, and have the additional benefit of grouping all rowing facilities outside the C&ONHP along Water Street, and grouping all paddling facilities around the historic WCC. Friends of Gtown Wfront park

Surfrider Foundation—Correspondence 177

Ms. Tammy Stidham
National Park Service
1100 Ohio Drive, SW
Washington, DC 20242

Attn: Georgetown Non-Motorized Boathouse Zone Development Plan

Dear Ms. Stidham,

The D.C. Chapter of the Surfrider Foundation is excited and supportive of NPS's efforts to improve public access to the Georgetown waterfront with additional non-motorized boating facilities.

As we stated in our 2012 interview, the D.C. Chapter of Surfrider is an all-volunteer run, clean water grassroots organization that works to improve the health of our coastal watershed and protect public access to our local waterways, particularly the Potomac River. Our over 3,000 supporters include surfers, stand up paddlers, prone paddlers, kayakers, canoeists, open water swimmers, and clean water activists. Over the years, our chapter has hosted numerous river cleanups and community events along the Georgetown waterfront area. As avid users of the Potomac River in the area outlined in the 2013 Non-motorized Boathouse Zone Feasibility Study, we are deeply interested in the installation of a free public access point within the zone that would give the community easy and safe access to this local treasure.

Upon initial review of NPS materials provided at the February 4, 2015, public scoping meeting, we have the following comments and concerns about the alternatives presented:

- **SAFETY:** Alternatives 1 and 2 show picnic areas upstream of the Washington Canoe Club (WCC) clubhouse. Alternatives 1, 2, and 3 depict a trail for public access across the apron between the WCC clubhouse and dock. We urge NPS to reconsider placement of picnic areas and trails through this area as it will create potential safety concerns and interfere with WCC members safe entrance and exit from the river with their boats/boards. If NPS wants to provide access to the area upstream of the WCC clubhouse, it should be from the Capital Crescent Trail.

- **VEHICULAR ACCESS:** The public access points and new boathouse facilities depicted in Alternatives 1, 2, and 3 will require vehicular access. It is not realistic or pragmatic to close off Water Street at 34th Street as depicted in Alternatives 1, 2, and 3 and tell people using existing or new non-motorized boating facilities that they must park on the street or in commercial facilities in Georgetown. Non-motorized boaters regularly transport stand-up-paddle boards, canoes, kayaks, and individual rowing shells on top of their cars. These watercraft can be heavy and cumbersome to transport by foot for long distances through pedestrian traffic. Without safe vehicular access, visitors and race participants especially will not be able to access launch areas.

- **ENVIRONMENTAL CONCERNS:** Our community also wants to ensure that new construction along the waterfront will minimize the following negative environmental impacts on the zone:

- * Further shoreline erosion - caused by the removal of trees and vegetation

- * Future erosion of soft shoreline restoration – due to the aggressive flow of water and debris due to tidal changes and frequent flooding

- * Potential negative effects of erosion on docks and access points – just upriver from the zone, tide and flooding have caused debris and the erosion of silt material to collect under and damage the dock in Fletchers' Cove. Our community is concerned that any large scale changes to the land upriver of Key Bridge may create similar future problems for all of the boathouses and docks within the zone.

- * Flooding concerns – Currently, the boathouse facilities located in the zone are set above a steep shoreline that is reinforced with rocks. Our community is concerned that the creation of beach launches may make the shoreline and boat house facilities downriver more susceptible to flooding

- **WASHINGTON CANOE CLUB:** WCC has been incredibly supportive of our Surfrider community. Although they are a private club, they have welcomed our supporters to their events, collaborated with

our Chapter on river cleanups, and graciously stored our community stand-up-paddle boards in their facilities for free. We eagerly await the restoration of their boathouse facilities, as it is an important historic landmark for non-motorized boating in the DC area. We hope that WCC will be able to maintain their presence within the zone, so that the community may continue to offer their world-renowned programming to future generations.

Based on these concerns, we write to express our support of Alternative 3 – the Low Impact Alternative that positions new boathouse facilities and a new public access point downriver of WCC. This plan will put the least amount of the strain on the environment, while opening up the area for the enjoyment of more non-motorized boaters. we highly encourage NPS to include a Cartop Drop off (similar to the one depicted in Alternative 2) in this plan. As we discussed above, the public will not be able to use the access point without this crucial vehicular access.

Thank you for your time, consideration, and the opportunity to comment on these exciting plans. we look forward to reviewing and commenting on NPS' environmental assessment regarding these plans in the near future.

Sincerely,

The Executive Committee
Surfrider Foundation - DC Chapter



FRIENDS OF GEORGETOWN WATERFRONT PARK

March 6, 2015

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ATTN: Georgetown Nonmotorized Boathouse Zone
Development Plan
Tammy Stidham
1100 Ohio Drive SW
Washington, D.C. 20242

Subject: Comments of the Potomac River Access Coalition

Dear Ms. Stidham:

Enclosed with this transmittal are the comments of the Potomac River Access Coalition on the scope of the environmental assessment of the Georgetown Nonmotorized Boathouse Zone Development Plan. The entities and organizations that support the positions taken in these Comments are listed in the first paragraph of the Comments.

If you have any questions concerning these Comments, please do not hesitate to contact me at 202-672-5367.

Sincerely yours,

Robert P. vom Eigen
President

FRIENDS OF GEORGETOWN WATERFRONT PARK
P.O. Box 3653
WASHINGTON, D.C. 20027

Comments
Of the Potomac River Access Coalition
On the Preliminary Alternatives for
The Georgetown Non-motorized Boathouse Zone
Development Plan

The Potomac River Access Coalition is an informal group representing the Friends of Georgetown Waterfront Park, George Washington University, the Georgetown Business Improvement District, Georgetown University, the Potomac Boat Club, Rock Creek Rowers, the Potomac River Sports Foundation, the Washington Canoe Club and various high school rowing programs in the District of Columbia. The objective of the Coalition is “to champion a cleaner, more sustainable and more vibrant river and Georgetown Waterfront enhanced by new and improved boathouses.”

We are deeply committed to both the vitality of the Georgetown waterfront and to a future plan for the area that will address the clear need and demand for expanded access for non-motorized boating activity in ways that also enhance use by others, including bicyclists and runners, from the entire metropolitan area including the most proximate communities of Georgetown, Foxhall, and the Palisades. Planning, of course, should provide for environmental sustainability and offer much needed educational opportunities to share with visitors regarding the historic importance of the area.

It is important to remember, in the context of this environmental assessment, that, up and down the Potomac in the age of canal transport, riverfront property was developed with piers, docks, boathouses, warehouses, and seawalls, all part of the industrial infrastructure in support of the C&O Canal, now within the C&O Canal National Historic Park. Later, into the 1960's, the area within the NMBZ was occupied by a number of significant industrial and commercial operations.

It would be totally appropriate and consistent with the intent of preserving the C&O Canal to implement a plan that would enhance Potomac River access with structures that evoke the earlier eras when this area was a hub of river-focused activity while expanding access to the waterfront for non-motorized boating activity as envisioned by the National Park Service in the 1980's.

As recognized by the National Park Service in the 2006 Environmental Assessment for the then-proposed Georgetown University Boathouse:

“Beginning in 1985, NPS conducted a series of studies to assess the demand for rowing facilities along the Georgetown waterfront. A study released in 1987 assessed the increasing demand and overall need for new boathouses along the Potomac and Anacostia Rivers, as well as appropriate locations for such facilities. In its later 1989 report, NPS noted that **the demand for rowing nationwide had doubled and increased by 60% in the Washington metropolitan area over the past three years.**”

There is no question that, in the twenty-six years since the 1989 update, demand has grown even more. In order to begin to meet this demand within the context of the serious budgetary constraints facing the National Park Service and other public entities, we acknowledge that funding to implement the final agreed upon plan will, of necessity, come from non-National Park Service sources.

Having reviewed the three “Preliminary Alternatives” in the public scoping newsletter and discussed at the February 4 public scoping meeting, we are concerned that reducing the potential sites from those proposed in the initial Feasibility Study (from four to three), seriously constrains the prospect for meeting current and future demand. We believe, therefore, that, in finalizing the environmental assessment, the National Park Service needs to evaluate development alternatives that both (1) address non-motorized boathouse needs and (2) are realistic and achievable in the near term even if it means adjusting site boundaries and locations to permit those constraints to be addressed.

For example, two issues further limit the construction of boathouses of the sizes envisioned in the alternatives in the NPS scoping documents (with footprints of 10,000 square feet on Site C, 7,800 square feet on Site D, and 13,800 square feet on Site E):

- The first applies to all three proposed sites in Alternative 1 (Sites C, D and E) and to the two sites in Alternatives 2 and 3 (Sites D and E). The DC Zoning Regulations only allow 1.0 FAR for boathouses in the area, in contrast to the 1.8 FAR that was referenced in the earlier Feasibility Study and seems to be carried forward in the recently proposed alternatives. Additional existing constraints, such as minimum setbacks from the water, Key Bridge, the Whitehurst Freeway, the Aqueduct Bridge, and the C & O Canal, will affect facility size and placement. Finally, the configuration of the bicycle trail shown on High, Medium and Low Density designs may create new site access problems for sites D and E. We recommend NPS

realign the bicycle route to the north or Canal side of Water Street to 34th Street where it would cross over to connect to the existing path in the Georgetown Waterfront Park.

- The second issue relates to Site C. DC Water is required by Consent Decree between the District of Columbia and the US Environmental Protection Agency to construct a deep underground storage tunnel to capture storm water and prevent combined sewer overflows. Its current plans call for an access shaft to the future deep tunnel at Site C. DC Water is petitioning the Court to allow a shorter tunnel in exchange for green infrastructure improvements that would divert storm water from the current combined system. However, even if it is successful, DC Water has made clear that, regardless of the extent of the envisioned new tunnel, there will be a large surface access point at Site C for existing sewer lines. Site C appears, due to these constraints, to be less practicable as currently configured in the NPS draft Alternatives.

Because of the foregoing considerations and constraints, we together urge the National Park Service to reexamine the currently identified sites and configurations and provide greater flexibility in locating viable sites for two university boathouses. Moving the two university programs from Thompson Boat Center into such facilities would free up space at Thompson's to be reprogrammed to allow greater general public access to the Potomac. The Georgetown and George Washington Universities' rowing programs currently occupy 62% of Thompson's indoor shell storage space. The facility also serves over a dozen high school and master's rowing programs as well as many individuals. Furthermore, it is important to keep in mind that both of the Universities own valuable parcels of Potomac shoreline property within the C & O Canal NHP area or adjacent to it and the NPS Rock Creek unit. These parcels would be transferred to the NPS in exchange for sites of lesser natural and historic importance located in the NMBZ. Completing these land exchanges with the National Park Service would clearly be in the public interest.

In deciding its best possible use, we urge the National Park Service to consider the waterfront area as a whole, unconstrained by, among other things, the boundaries currently designated between Sites A – E. Surely, if viewed with an eye to providing flexibility and a goal of a vibrant waterfront, the area can support the Washington Canoe Club, the Potomac Boat Club, two new university boathouses, and increased public access to the water and the park and Capital Crescent Trail. And this would indeed be possible without relying upon Site D,

which Key Bridge Boathouse is currently serving paddlers with rental and private boat storage very successfully. This approach would bring the added benefit of freeing up space at Thompson Boat Center and, with it, greatly increase public access to the Potomac in that downstream area as well.

Given the serious limitations referenced above regarding Site C, the representatives of our Coalition have discussed the possibility of a proposal which would result in moving slightly upstream, stabilizing, and restoring, with private funds, the historic clubhouse of the Washington Canoe Club. This registered historic structure is currently in a state of disrepair and partial use by the Washington Canoe Club, which is undertaking a process to restore its clubhouse to structural integrity and full use. Of course, any plan to move the structure must comport with any restrictions imposed through its historic designation and must be sensitive to other concerns. For example, to the extent that the historic structure could be moved upstream onto a portion of Site A, the remainder of Site A could be restored to its natural habitat rather than developed in a manner contemplated by NPS Alternatives 1 and 2 for High and Medium Density development. As stated in the earlier 2006 Environmental Assessment, “[m]uch of the vegetation on the site (Site A) is not native”, and undertaking habitat enhancement on the upstream (western) portion of Site A, by reinstating native trees and other vegetation, could improve wildlife habitat in the area. Such a plan, if recommended, could be far more beneficial in all respects than the High and Medium density development plans.

Although we ourselves as a Coalition do not have a specific proposal to present at this time in this regard, we recommend that the National Park Service be open to exploring such an alternative and, generally, consider the waterfront as a whole when deciding its best use. Of course, any final proposal from the Coalition must take into account myriad communities of interest, but such a plan could potentially benefit all by accommodating university rowing programs while restoring the Washington Canoe Club building and the parkland upstream from the historic clubhouse.

In closing, we would also like to include for the record that we believe there needs to be a more creative exploration of access opportunities along the Potomac waterfront than is possible in the narrowly defined NMBZ. Earlier in these comments, we noted the public benefit that would result from the two university rowing programs being relocated out of Thompson Boat Center thereby freeing up significant space at Thompson’s for high school and individual rowing. We would

urge the National Park Service to then look at creative approaches to ensuring the long overdue redesign of Thompson's to better serve those needs.

Also, again outside the scope of the current Environmental Assessment, we encourage the Park Service to consider West Potomac Park, as well as Fletcher's Boathouse, as viable alternative sites for public river access for canoes, kayaks and paddleboards. West Potomac Park has a considerable expanse of open access to the Potomac River. In addition, parking is more readily available than in or near other locations in the Boathouse Zone. Locating such a facility there would help alleviate not only parking, but also traffic congestion among cars, bicyclists and pedestrians in the Non-motorized Boathouse Zone.

We appreciate having had this opportunity to comment and stand ready to be a resource as the National Park Service moves forward with the Environmental Assessment.

The Potomac Boat Club

3530 Water Street, NW

Washington, DC 20007

March 6, 2015

Ms. Tammy Stidham
National Capital Region
National Park Service
Washington, DC
via email: tammy.stidham@nps.gov

Re: Public/Stakeholder Comment on Scoping Plan for the Georgetown Non-Motorized Boathouse Zone Development Plan (dated January, 2015)

Ladies and Gentlemen of the National Park Service:

We are pleased to submit these comments for, and on behalf of, the Potomac Boat Club.

Founded in 1869, the Club has been at its current Potomac shoreline location since 1908, land that it owns in fee simple. The Club is incorporated under the laws of the District of Columbia and has been recognized as a tax exempt 501 (c) (7) organization by the Internal Revenue Service (IRS). A separate DC non-profit corporation, the Potomac River Boathouse Foundation, was formed in 2014 with a mission to preserve, among other things, the National Register of Historic Places-listed PBC structure. The Foundation has received recognition by the IRS as a charitable, tax exempt organization under sections 501(c) (3) and 509(a) (1).

Potomac Boat Club is one of Nation's oldest boat clubs with a rich history of competitive rowing and paddling. Many of our athletes have gone on to represent the United States on Olympic, Pan American and National rowing and flat-water paddling teams. Currently the Club has an extremely active membership. The facility is used on a daily basis, 365 days a year. In addition to members and guests, the Club has hosted Washington-Lee High School (Arlington, VA public high school) rowing program for 66 years; approximately 100 W-L students, boys and girls, use the Club annually during their season.

Located in the center of the proposed Non-motorized Boathouse Zone (NMBZ), the Potomac Boat Club will be acutely affected by the decisions that the National Park Service makes in terms of both land-based access and other uses on the water. As a general matter, Potomac Boat Club welcomes the efforts of the NPS to expand the number of facilities that would be able to accommodate rowing and other non-motorized uses of the Potomac. We have seen the demand for access to the Potomac River increase substantially in recent decades without any increase in facilities to store and launch boats or manage the growing numbers of individuals who seek to participate in rowing and paddling. We have responded by stretching the capacity of our facility physically and programmatically. PBC members, guests and visitors alike appreciate the unique and precious access they enjoy to the Potomac through our facility, and we are eager to share the river we love with more neighboring facilities that can accommodate such increased participation in paddling and rowing.

General comments

The Potomac Boat Club is generally supportive of all draft Alternatives (High, Medium, and Low), subject to the points made in this letter. We also would like to offer a few ideas where the Alternatives could be modified so as to better attain the goals of the NMBZ. The specific issues we would seek, and require, to be addressed, are as follows:

1. Access to Potomac Boat Club

Potomac Boat Club is the owner of valuable property that is entitled to full access to and from Water Street, NW, a local public street owned and maintained by the District of Columbia. We currently have access to a small number of parking spaces in front of the Club and additional on-street parking, both metered and also time restricted, non-metered on local District-owned streets. The Club is an active organization, and its members have accessed the Club for over 100 years on this public street.

Our rowers, individuals and teams, also need to load and unload boat trailers or cartops at least weekly during the Spring, Summer and Fall to transport racing boats to out-of-town races. Loading rowing shells onto transport vehicles requires that vehicles and trailers be positioned close to the Club. Each eight-oared shell is approximately 65' in length and weighs over 300 pounds, for example, and cannot be carried safely for long distances or across busy traffic lanes.

While we are willing to work with the NPS and others involved to address safe access to new facilities within the NMBZ, we cannot forfeit our existing access to and from Water Street, NW. The various alternatives for the NMBZ are unclear as to the proposed configuration of Water Street, but the three alternatives (High Medium and Low) indicate significant constraints on the nature of access to Potomac Boat Club as it exists today. Such constraints would not be acceptable to us as private landowners on a local public street, irrespective of our location within a newly designated NPS- NMBZ.

2. Addressing the Capital Crescent Trail/Bicycle Traffic

The drawings for the NMBZ alternatives (High, Medium and Low) indicate a dedicated lane for bike traffic along Water Street, NW. We appreciate the need to rationalize the situation as it exists today; the main entrance to/exit from the Capital Crescent Trail (CCT), a bicycle and pedestrian trail on NPS land, funnels users into or from the center of Water Street, NW through two gates immediately adjacent to PBC under the Alexandria Aqueduct Bridge arch. We are not clear on why the proposed designation of a NMBZ for improving water access for paddlers and rowers has been combined with the matter of designing a safer bicycle pathway on District streets to connect the CCT and the Georgetown Waterfront Park. Separating bicycle, pedestrian and vehicular traffic and making better connections between the CCT and GWP trail are matters that NPS and the District have had 25 years to discuss, explore and create better alternatives.

While we were not consulted on the recent installation of the CCT gates, their effect has been to compound pre-existing confusion for cyclists, drivers and pedestrians alike. We witness daily all sides of the equation: clueless drivers executing U-turns at a surprise dead end, equally clueless bikers speeding through as though the CCT never ended, and oblivious pedestrians and runners in the middle of the street. (The 'clueless car' situation is exacerbated by reason of many satellite navigation systems being unable to

distinguish whether a car is on the Whitehurst Freeway or Water Street, and thus many people drive down Water Street believing they are going to Key Bridge or Canal Road).

As shown on the drawings, all NPS alternatives (except No Action) show a dedicated bike lane that would severely restrict access to the Club and eliminate space for loading and unloading boats. This design leads to our comments above regarding access to our property. We strongly object to the designs shown. We suggest that the NPS and the District consider a distinct bike lane on the east (or north) side of Water Street extending to 34th Street NW and crossing there to the Georgetown Waterfront Park bike trail.

Specific Comments

Alternative 1 – High Density. We support Alternative 1 (High Density), but note that it may not be the most preferable of Alternatives 1, 2 and 3, as currently configured, for the following reasons: First, it creates a very dense environment of docks on the water; second, it relies on usage of Site C for a boathouse, which we believe is very problematic given the needs of DC Water and its potential use of the land as an access point for its new interceptor tunnel; and third, it does not address the access issues of Potomac Boat Club (as noted above), nor does it meaningfully address access to the Site C boathouse. Two modifications we would suggest considering are (1) moving the WCC entirely or partially onto Site A and using Site B as a boathouse location (in lieu of Site C), or (2) revisiting Site A as a boathouse location with Georgetown University being the primary user. Georgetown student rowers would likely access that site on foot or bike, avoiding the addition of more vehicular traffic on upper Water Street and into the C&O Canal Park area.

Alternative 2 – Medium Density. We support this alternative, subject to the access and bike lane issues described above, and believe it is the best alternative, as currently depicted. We note that the cartop drop-off area would create the same issues that resulted in the current gates being built under the Aqueduct, and that bike/car interactions would have to be solved. We believe the locations of aprons between, and separating, boathouses are a very useful idea, and would make moving and loading boats more feasible. We also note that canoe/kayak facility being above the rowing facilities may result in a safer and more appropriate location, so as to help divide the two different types of river traffic and avoid collisions between novice kayakers and stand-up paddle boarders, who often are just visiting D.C., and rowing shells that have limited forward visibility.

Alternative 3 – Low Density. We support this alternative, but believe it is the least preferable of the three alternatives that advocate boathouse development. The access and bike issues addressed above are again noted, but this alternative is the least efficient at creating new boathouse space (one facility in total), and instead significantly increases kayak/canoe access. Compared to Alternative 2, which seems to optimize locations for boathouses, aprons and kayaks/canoes and drop off areas for the same, this alternative creates one combined facility, which is less than ideal, and essentially ‘mashes’ the uses together. We believe that the uses are better approached through individual optimization (and we believe kayakers/canoers would agree with this), and thus would suggest that Alternative 2 is the better approach overall.

No Action Alternative. We believe that having more boathouse facilities on the Potomac is preferable, we support more facilities, and thus we believe this is the least attractive of all alternatives.

Conclusion

We are glad to see the NPS continue to advance the designation of a Non-Motorized Boathouse Zone as the first step in actually designating sites for new boathouse facilities and other points of access. We can only hope that the Service continues this momentum, and look forward to Georgetown's Potomac shoreline better accommodating the thousands of individuals who seek to enjoy the beautiful Potomac River through rowing, kayaking, canoeing and stand-up paddling. While it has taken far too long to get to this point, let's keep it moving.

We do have serious concerns about access, as discussed above. The Service needs to address assurance of reasonable access for existing facilities in its plans. We pledge a willingness to work with the NPS to help achieve mutually acceptable solutions. We don't want to be an obstacle to this effort, but we will actively protect our rights as a significant, private landowner. We would also suggest that NPS could identify additional locations outside the small area identified as the NMBZ for launching kayaks, SUPs and canoes, such as West Potomac Park. There is no good reason to delay action on siting facilities within the NMBZ, but there are additional places to consider that would be consistent with good stewardship of the public domain and improved access for river based recreation. Additional locations beyond the NMBZ would also reduce the impact of concentrating river access in one small area.

As we at Potomac Boat Club prepare to celebrate our 146th anniversary, we look forward to welcoming new shoreline facilities. Let's work together to build appropriately on the rich history of boating in Georgetown to create an even more attractive and active riverscape, one that allows Washingtonians and visitors to directly and personally appreciate the Nation's River.

Thank you for the opportunity to comment.

Sincerely,



Ed Ryan, PBC President 2012-14



Erik Meyers, PBC President 1983-89

Authorized Representatives for the Potomac Boat Club

Copies

Pamela Roberts, President, Potomac Boat Club
Board of Governors, Potomac Boat Club

Washington Canoe Club—Correspondence 143

WASHINGTON CANOE CLUB

Ms. Tammy Stidham
National Park Service
1100 Ohio Drive, SW
Washington, DC 20242

Attn: Georgetown Non-Motorized Boathouse Zone Development Plan

Dear Ms. Stidham

Members of the Washington Canoe Club (WCC or Club) appreciate the long-term relationship between the Club and National Park Service (NPS). For more than 110 years, the Club has maintained a prominent presence on the Georgetown waterfront, providing non-motorized recreation to scores of Washingtonians and paddlers from around the globe. We value this partnership and, as you are aware, are working closely with leadership from the C&O Canal National Historic Park (C&O Canal NHP) and NPS National Capital Regional Office to maintain the services WCC provides the community for years to come. Accordingly, members of the Club are excited and supportive of NPS efforts to develop comprehensive plans for improving the Georgetown waterfront with additional non-motorized boating facilities.

An essential element, from WCC's perspective, of this plan is to resolve as quickly as possible lingering questions about the long-term status of the Club in relation to ownership of the clubhouse, the land and improvements to it, and a schedule for rehabilitation of our clubhouse. How NPS proposes to work with the WCC on its clubhouse, storage and the parking areas WCC members have used for more than a century, and on the access to and uses of our docks, are of paramount interest to WCC. Use of the land and WCC dock are integral to whatever NPS proposes in its plan. Until WCC and NPS agree on many questions surrounding this topic, we find it difficult to know the most effective way to provide NPS input as to future development in the non-motorized boathouse zone. Discussion between NPS and WCC during preparation of the EA is essential.

Upon initial review by WCC members of NPS materials provided at the February 4, 2015, public scoping meeting, we have many concerns with and questions about the alternatives presented as well as the processes NPS expects to use to move forward. Those materials describe 4 alternatives:

- Alternative 1 - high density: three new boathouses plus two storage building, three new docks, a canoe/kayak launch beach, as well as other facilities.
- Alternative 2 – medium density: two new boathouses and docks, two storage buildings, two canoe/kayak launch beaches, as well as other facilities.
- Alternative 3 – low density: two new boathouses and docks, a building, a canoe/kayak launch beach, as well as other facilities, and an emphasis on shoreline protection and enhancement.
- No Action Alternative.

WCC looks forward to obtaining more information about the details of the proposals than what NPS made available at the meeting, basically a 4-page handout with small illustrations and little additional explanation. At this early stage of the NPS planning process, we lack enough understanding of the alternative proposals to support any particular one. We hope that NPS will involve WCC and other interested parties in further discussions while you further develop each alternative. At the meeting, NPS officials stated that they thought the contemplated environmental assessment would be adequate to address potential environmental (natural, social, and cultural) topics of implementing the proposal. Does NPS anticipate preparing supplemental NEPA documents when one or more facilities are constructed? What assurances can NPS provide the public that it will have adequate opportunities to review specific facility proposals? These are more than procedural matters. They are critical for NPS to address in the anticipated environmental assessment.

Below we provide comments specific to the WCC as well as general principles we believe NPS should

apply as it develops and implements plans for the Potomac River shoreline in Georgetown.

Comments specifically addressing Washington Canoe Club

Based on existing information, we want to have further discussion with NPS on the following topics:

- Alternatives 1, 2, and 3 recognize the WCC building and dock. None depict areas surrounding the building that the club uses to store member and Club canoes, kayaks, paddleboards, or other equipment, or parking areas currently used by members. NPS needs to recognize both that WCC has grown over the last hundred years (requiring additional storage space for not only canoes and kayaks but also a substantial number of stand-up paddle boards: SUPs), and that WCC programs have evolved along with paddling sports so that we now utilize boats that can not fit inside the WCC clubhouse (our 6-person outrigger canoes). The motorboats that our coaches use to train racers and transport race officials also need storage space.
- How does NPS propose to accommodate boat storage and equipment so essential to having a vital canoe and kayak program at WCC?
- None of the alternatives depict any security measures, such as fencing, for WCC members to store boats. Having safe places to store racing canoes and kayaks that can cost several thousand dollars is critically important to WCC members. Even a rehabilitated WCC clubhouse will not have adequate indoor storage capacity for members' boats.
- Alternatives 1, 2, and 3 depict a trail for public access across the apron between the WCC clubhouse and dock. Alternatives 1 and 2 show picnic areas upstream of the WCC clubhouse where WCC members currently store our boats. We urge NPS to reconsider placement of picnic areas and trails through this area. If NPS wants to provide access to the area on undeveloped land upstream of the WCC clubhouse where WCC has traditionally had outdoor storage for its boats, it should be from a pathway immediately adjacent to the Capital Crescent Trail, on the trail side of the clubhouse.
- WCC members carry boats, some of which exceed 18 feet in length, by themselves. These boats are challenging to carry. As a safety matter, having a public pathway where cyclists and pedestrians are moving perpendicularly to people carrying canoes or kayaks (often with limited visibility) poses significant hazards.
- WCC was pleased that the proposals and statements made by NPS officials at the public meeting recognize the "choke point" created within the C&O Canal NHP where the Capital Crescent Trail, the canal retaining bank, the historic WCC clubhouse, and the Potomac River come together and effectively restrict development of additional structures upstream of WCC site. WCC hopes that NPS sticks to this position.
- NPS must address traffic flow, vehicular access to boat houses and launch facilities, and parking in the area for boat house patrons. It is not realistic or pragmatic to close off Water Street at 34th Street as depicted in Alternatives 1, 2, and 3 and tell people using existing or new non-motorized boating facilities that they must park on the street or in commercial facilities in Georgetown. We encourage NPS to work with DC Department of Transportation to close Water Street to through traffic at 34th St, and allow parking for regular users (WCC, Potomac Boat Club, and patrons of commercial non-motorized recreational boating facilities) and access for trailers and individual cars to do drop offs provided. WCC and Potomac Boat Club members have long parked in what would be the closed-off area under each alternative. This is especially problematic because non-motorized boaters regularly transport canoes, kayaks, and individual rowing shells on top of their cars. Having "launch areas" without providing vehicular access and parking is nonsensical.
- The plan mentions the possibility of two or three new boat houses without providing much detail about who might build them, how NPS would select among competing groups, who would manage/operate them, public access to them, etc. What model does NPS have for these – something like the publicly-owned and concessionaire-operated Thompson's Boat House or more in line with the Potomac Boat Club and WCC where public access is restricted? It's not clear whether NPS expects to build the facilities and lease them or rely on privately-funded entities to build them. Based on our experience in working with NPS, clarifying the relationship between NPS and private entities is fraught with complexities. The draft environmental assessment (EA) must describe the processes NPS expects to use when implementing this plan. Without a reasonable process for implementing a plan, it is likely to sit on shelves and gather dust. NPS needs to take time to discuss these procedural matters with potential boat house funders and operators prior to putting a plan in place.

General principles NPS should use when developing and implementing a plan

As NPS moves ahead with its plan and analyses for Georgetown waterfront, we encourage you to use the following general principles to guide your thoughts.

- Protect the natural and cultural resources of the C&O Canal National Historical Park from development.
- New rowing and paddling facilities should be located along the river bank for easy access while posing minimal disruption of natural and cultural resources
- Address potential safety and traffic issues during/after construction at the narrow trailhead of the Capital Crescent Trail, where both the Aqueduct Arch and a possible DC Water sewer access shaft make for extreme congestion.
- Include the following new alternative: instead of three new large rowing boathouse structures in the narrow, fragile, congested zone, build only one new boathouse at 34th St., and share it with university, high school and public programs (like nearby Thompson's Boat Center). Use surrounding land for storage and launching needs.
- Address congestion issues now experienced at Thompson's Boat House during peak times of use when school teams are practicing (mornings and afternoons) and regattas (primarily spring weekends) are occurring. Moving exceedingly long trailers used to haul 8-person crew shells on Water Street can be treacherous. Increasing traffic of similar vehicles in Georgetown would not be acceptable.
- Ensure public has access to the Potomac waterfront for non-motorized boating, including modern rest rooms, within the C&O Canal NHP.
- If NPS considers land swaps, make public the valuations used for the swaps.
- Accommodate walking, bicycling, and paddling sports on an equal basis with team and individual private rowing.

Summary

WCC appreciates the Park Service's efforts to plan for a vibrant solution to non-motorized paddling activities on the Potomac River in Georgetown. The demand is present and increasing as anyone can see during good weather. Nevertheless, the paucity of information about details of various alternatives NPS presented at the February 4, 2015, public meeting lead us to believe that additional background work needs to be done with groups and interests that are key to successful implementation of a plan. WCC has been a long-time partner of NPS. We want to continue to work with NPS to assure that the Club remains an important component of the Georgetown waterfront. We look forward to further discussions with you and others as this process progresses. The WCC's primary representative in these discussions is Andrew Soles.

Sincerely,

Andrew Soles
WCC President

B-CC Crew Boosters—Correspondence 159

B-CC Crew Boosters, Inc., on behalf of the Bethesda-Chevy Chase High School rowing team (B-CC Crew), respectfully submits these comments in support of Alternative 1--the high density plan for development of the Georgetown Nonmotorized Boathouse Zone.

B-CC Crew first began renting rack space and rowing out of Thompson's Boat Center (TBC) in 1993 with 26 students using a handful of borrowed boats. Today, 112 boys and girls compete on our team with our own fleet of racing shells, launches, and a trailer. The team size has increased 20 percent just in the two years that have elapsed since we submitted comments in response to the NPS 2013 Boathouse Feasibility Study. Our athletes, who travel to TBC during afterschool hours five days a week from Montgomery County, Maryland, practice and compete during both the fall and spring seasons. TBC's existing storage capacity is extremely limited for all teams. We are allotted space to store nine hulls there, while we own and try to float as many as 14 hulls each spring through equipment sharing with other rowing programs.

B-CC Crew's growth and inclusion of as many students as express the interest and commitment to row is consistent with the experience of other high school rowing teams in the metropolitan area, many of which also row out of TBC. There are numerous benefits associated with these high school rowing programs, including health and fitness for hundreds of teens, teamwork, coaching mentorships, opportunities to learn stewardship of the river, and to compete in a beautiful sport that could potentially become a lifetime activity. Community organizations in other large cities, including Boston, Pittsburgh, and Chicago, have developed ground-breaking programs to make rowing accessible to high school students from all backgrounds and with varying levels of physical abilities. Recognizing these benefits and the need for space to make them possible, the City of Chicago in 2011 pledged to build four new boathouses and has already completed two facilities, and a third is under construction. *See* <http://nytimes.com/2014/05/18/sports/rowing-toward-hope-in-a-troubled-world.html>; <http://childrenshospitalblog.org/for-patients-in-the-owl-program-joining-a-rowing-team-makes-all-the-difference>; <http://www.post-gazette.com/news/health/2010/12/13/Beyond-rowing-Inner-city-girls-benefit-physically-mentally-from-the-sport/stories/201012120222>.

Unfortunately, the existing Georgetown boathouse facilities are not able to safely or logistically accommodate these promising opportunities. TBC, a 55-year old building with significant on-going and unaddressed maintenance needs, is severely overcrowded. As we stated when we addressed the 2013 Feasibility Study, the demand for boat storage and river access will continue to exceed the lower number of facilities included in the medium and low density alternatives. The three boathouses, shoreline enhancements, storage, docks, and Capital Crescent Trail expansion under Alternative 1 will allow full access and enjoyment of the recreation zone. Further, we continue to see "Site E" as a logical starting point because its development is included under all three alternatives. "Site E" also has potential for fast-track completion because its location has no impact on the C&O Canal, the Capital Crescent Trail, or DC Water facilities. To the extent that there is no significant impact shown as a result of the impending environmental assessment, we urge NPS to move forward as quickly as possible to choose Alternative 1.

While rowing is an environmentally responsible activity, we recognize that higher use of the recreation zone necessitates maintenance and conservation efforts to protect natural resources and manage land use. We urge NPS to explore options such as community and business partnerships, many of which already exist today, to assist with these efforts, while making available the Nonmotorized Boathouse Zone for its long intended purpose of allowing safe and viable access to the river.

We appreciate the opportunity to put these comments into the record.

B-CC Crew Boosters, Inc.

Marilyn Emery, President

Woodrow Wilson Crew Boosters—Correspondence 42

The Wilson Crew Boosters would like to first acknowledge the ongoing work and dedication that the National Park Service has put forth in its efforts to refine and bring to fruition a Non-Motorized Boathouse Zone - an integral part of the Georgetown Waterfront.

Wilson Crew Boosters fully support a cooperative arrangement with our local collegiate institutions, not only to add much-needed new facilities, but to foster and grow our long standing relationships with them as part of the rowing community. We hope consensus will occur, and that the NPS will quickly move beyond the planning stages for new boathouses to be developed in the near future.

We house our equipment and row out of the Thompson Boat Center in Georgetown alongside numerous area high school teams, two collegiate teams, other recreational teams and Thompson's own rental and instructional programs. Our coaches must coordinate four squads with five to six practice times each, five days a week and on Saturdays. There is no doubt that Thompson's is a heavily-used facility with a long waiting list for additional rack space and cleat rentals.

Wilson Crew, the only public high school rowing program in the District of Columbia, is celebrating its 30th anniversary in 2015. We are a growing and vital part of the District's scholastic rowing community with 100 athletes, up more than 20 percent from when data on scholastic rowers was collected as part of the NPS's March 2012 public meeting presentation, and four full-time and three part-time coaches. Given the size of our growing team, we anticipate needing eight full time coaches for the 2015-2016 season.

Wilson Crew is:

- A program is based at Woodrow Wilson High School where students from other DC public schools are welcome to join the team. We have had rowers from School Without Walls, Banneker High School, Duke Ellington School of the Arts, as well as from Alice Deal, Hardy, and Oyster-Adams Bilingual School.
- A member of the Washington Metropolitan Interscholastic Rowing Association ("WMIRA"), which is made up of former DC and Maryland National Capital Area Scholastic Rowing Association (NCASRA) member schools, and the Wilson Tigers are strong competitors in local, regional and national regattas throughout the fall and spring rowing seasons.
- Completely self-funded and run by Wilson Crew Boosters, a large parent-volunteer organization that supports every aspect of the rowing program. Necessary funds are raised through dues and fundraising efforts.

Wilson Crew Boosters 2015 Board of Directors

Emma Stewart, Co-President

Amy Elliott Co-President

Anne Morin Co-Treasurer

Sam LeBlanc Co-Treasurer

Nancy McCarren Secretary

Canoe Cruisers Association—Correspondence 107

I have reviewed your plans, and I do not see any provision for parking. Many people in the DC area own non-motorized boats (canoes, kayaks, etc.) which we transport on the roof of our cars. To make the area useful for us, we need a parking lot. Without a place to park, you are restricting usage to people who walk in and rent boats.

As a boat owner, I am happy to pay parking and boat launch fees, as are most paddlers, but you will not see that revenue without a parking lot.

Susan Sherrod
Chairman

Canoe Cruisers Association
chariman@canoecruisers.org
<http://www.canoecruisers.org>

Chesapeake Bay Yacht Club Association—Correspondence 32

From: **Harold Seigel** hmandds@aol.com
Subject: Letter
Date: February 20, 2015 at 3:35 PM
To:



To: Tammy Stidham
Chief, Planning, Compliance & GIS
National Capital Region
National Park Service
ATTN: Georgetown Nonmotorized Boathouse Zone Development Plan
1100 Ohio Dr. SW
Wash, DC 20242

From: Harold Seigel. CBYCA. 02/20/15
2133 Dominion Heights Court
Falls Church, Va. 22043

Re: Comment on proposal for non motorized boathouse facility

I wish to offer an opinion, comment, and suggestions regarding the proposal. We strongly oppose the park services proposal, as it apparently ignores and avoids the largest stakeholders of the Potomac River-Washington DC waters, namely the powerboaters of the entire Chesapeake region. We believe, and it is unfortunate, that up to this point we have not been included in the process of improving and providing our expertise in the Georgetown or Arlington riverside experience. We believe that previous plans and studies are outdated, non inclusive, and are irrelevant considering the modern needs of the boating community. The 1987 study was done prior to the tremendous growth of power boating in the Georgetown waterfront area. The 2013 feasibility study as well simply ignored the huge demand for powerboat docking facilities in Georgetown.

The members of the National Potomac Yacht Club, The Potomac River Yacht Club Association, The Chesapeake Bay Yacht Club Association, independent boaters, and registered boaters of the District of Columbia, Maryland, and Virginia have grown substantially in the past 20 years. There are 3000 registered boaters in the District of Columbia alone.

Powerboaters far outnumber non motorized boaters. The acute lack of powerboat docking facilities in all of Washington are obvious. Unlike non

powerboats, many powerboats are on the river all year long and to a large extent at night enjoying the Washington DC waters of the Potomac River. There is absolutely no reason not to allow and include powerboats in the proposals. The question must be asked why are powerboaters' concerns being excluded?

The waterfront at Georgetown is one of the prime, if not the prime destination spots on the Potomac River for powerboats. We believe that the river and the waterfront should be shared by all, and not restricted in any manner. The park is for the preservation and benefit of all of the public. There is absolutely no reason to limit the area in question to non-powerboats. Powerboats do not have any special needs or requirements. Furthermore, there is no safety issue regarding power and non-power boats co-existing. There is obviously much room available for powerboat docking. The physical docks are similar. At the very least docking for dinghies and small powerboats should be provided. The dinghy docks in Annapolis, Md. is a great example. Also the waters north of Memorial Bridge is a no wake zone so safety is not an issue.

The proposed plan is significantly one-sided in that it does not provide for a balance of water related recreational activities. To propose only "non-motor" boating related activities does not recognize the serious need for expanded dock-space for power boats. The current dock space allowed for non-commercial power boats on the Georgetown bulkhead has been significantly reduced by commercial cruise boat set-asides. One only has to look at the number of boats crammed into the limited space on summer evenings to realize something is wrong. This situation makes for unsafe conditions with so many boats tied together and their owners and guests crawling over each other trying to get ashore or back to their boats. It also limits access to the businesses that have a large part of their income generated by the visiting power boat owners and their guests.

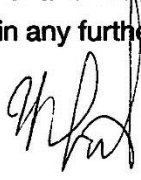
The Chesapeake Bay Yacht Club Association has passed a motion to allow powerboat docking on the DC side of the river, in direct objection and opposition to your non-powerboat proposed area by the Key Bridge. We now propose that at minimal cost and great benefit, that the plans for the zone in question include dockage for powerboats. We do not propose or request any other special needs such as electric, fuel, pumpout, or any structures- just an environmentally friendly simple dock capable of handling powerboats. There is no requirement for parking

facilities as would be the case for crew boat facilities. As the largest stakeholder and user of the potomac river and the georgetown waterfront area, we request and expect to be included in any further discussion and planning. Thank you for your kind attention.

Harold Seigel

Hmandds@aol.com

Chesapeake Bay Yacht Club Assn.

A handwritten signature in black ink, appearing to read 'H Seigel', is positioned to the right of the typed name 'Harold Seigel'.

Chesapeake Paddlers Association—Correspondence 137



Ms. Tammy Stidham
Chief, Planning, Compliance & GIS
Georgetown Nonmotorized Boathouse Zone Development Plan
1100 Ohio Drive SW
Washington, DC 2024

Dear Ms. Stidham,

I am writing on behalf of The Chesapeake Paddlers Association, Inc., a nearly-700 member sea kayaking club with members in all parts of the Chesapeake Bay region, including the length of the Potomac River. We are an all volunteer organization whose mission statement is:

"...to promote safe sea kayaking and safe paddling practices through the education of the local sea kayaking community and the interested public."

CPA member Rich Stevens and others have attended your last two planning meetings. While we are very happy that the National Park Service (NPS) is finally moving forward on establishing a new public access point in the vicinity of Key Bridge on the Potomac, we feel that this project, as planned is overly ambitious and perhaps more expensive than it needs to be, while not really meeting the immediate needs of the general car top non-motorized boating public.

In general, a kayaker, canoeist, or stand up paddle boarder (SUP) requires only three things:

- A) easy access to the water,
- B) adequate parking, and
- C) some form of bathroom facilities, even if it is just a well maintained port-a-john.

We are pleased that a beach-like area has been built into the design, as was suggested in the past meetings. As long as there is a firm, preferably sandy, gently sloping bottom, and room enough to maneuver a nearly-twenty foot boat, that is all that is needed. It is the much the preferred way of launching a car top boat and very inexpensive to construct and maintain when compared to any sort of dock. We strongly advise against some of the roller ramp systems that have been installed in other locations, as many of these designs have been found to cause severe damage to hard-shelled boats constructed of fiberglass, Kevlar, or carbon fiber. In addition, ramps and docks are very vulnerable to damage due to flooding or ice and require more in ongoing maintenance costs.

Access to the water includes being able to drive to the put-in. This aspect is unclear in all but Alternative 2. A sea kayak, canoe, or SUP can weigh in excess of seventy pounds and can be as much as eighteen feet long. Normal gear that accompanies the paddler can be bulky and heavy to tote easily as well. It is impractical to require that the boat and equipment to be carried any great distance to the launch site,

although parking need not be at the launch site as long as the distance is reasonable (say 100 yards or less).

The second essential, adequate parking appears to be very poorly addressed. This area is notoriously deficient in parking, which, in our opinion makes the whole idea of public access for car top boating impractical. What little parking there is generally consists of four-hour meters located at a distance from the proposed launch area and is almost entirely taken up by local commuters. Many of our members and many other car top boaters often go out for more than four hours. You also have to consider the time it takes to get on and off the water. It is not like driving up, locking the doors, and heading out as with hiking or biking.

We are also somewhat mystified by the numerous boathouses shown on all three action plans, some quite large and located in an area known for periodic flooding. Few if any of our members use a boathouse for boat storage, and those that do, along with the general public, could easily be accommodated at a kayak rental concession, as shown on Alternative 1. There are existing storage facilities at the Key Bridge Boat House available for rent to the general public. If this or another operation could be incorporated into the new plans, as shown in Alternative 1, possibly with more space, the general public could easily be served. In addition, the concessionaire would be responsible for the upkeep and security of their facility, reducing the cost to the NPS. Given the popularity of the existing rental concession with people who do not or cannot, for various reasons, own their own boat, we feel that the inclusion of a rental facility would be highly desirable and would likely better meet the needs of more of the general public, than the seemingly excessive boat storage..

In addition, the numerous boathouses shown on the plans raise another question. This project proposes to increase the **public's** access to the Georgetown waterfront and provide access to the **public** for non-motorized water sports. Are private universities, private boat clubs, scholastic teams, and other entities **NOT** open to the public at large considered part of **the general public**? Our members do not perceive them as such. If meeting the needs of many organizations like these is the reason for including these structures on the plans, we believe that they are not in the spirit of the overall concept of providing true **public access**. Certainly there should be some accommodation for this part of the population, but we believe it should be more balanced with the needs and interests of the general boating population.

If these boathouses are for the primary use of organized teams and not the general public, we have to wonder how the NPS analyzed the population of non-motorized boaters in determining how it justified the inclusion of the seemingly excessive number of boathouses and storage facilities. Chuck McMillan from Chesapeake Kayak Adventures and Andy Stevens from the Washington Kayak Club have put together some statistics readily available on the Internet from sources like the U.S. Census Bureau, The U.S. Coast Guard, Georgetown and George Washington's Rowing Team websites, the Outdoor Retailers Association, the Outdoor Foundation and a website called Statistica.com. Based on the Census Bureau's Washington/Baltimore/Arlington Statistical Metropolitan Area (W/B/A/ SMA), there are about 7,500 new kayaks sold every year and between 400,000 and 500,000 people that go kayaking in the area every year. These numbers include all types of kayaks including sea kayaks, whitewater kayaks, recreational kayaks, and fishing kayaks. They do not include canoes which currently number less than either sea

kayaks or whitewater kayaks or stand up paddle boards (SUPS) which are now outselling sea kayaks and white water kayaks combined. The Georgetown and GWU rowing websites list team rosters that total just over 100 students. We can't ascertain how many local high schools also actually use the Georgetown waterfront but let's assume that there are 15 of them with 50 students each. That brings the rowing teams in the area to a maximum total of 1,000 students. It would seem that catering to private and school based rowing groups is misguided, at best, and not in the general non-motorized boating public's best interest.

Knowing that budget concerns and fiduciary responsibility for public tax dollars are important, here are a few more thoughts. These vulnerable structures would add greatly to the cost of the overall project, delay its implementation, and incur significant ongoing expenses in terms of maintenance, repair, general operating expenses, and security. Some of the entities that have traditionally looked to use facilities such as these, like local universities, likely have endowments that represent a substantial percentage of the entire NPS's annual budget and can well provide their own facilities without the use of public funds, and perhaps valuable and scarce parkland. Some or all of this land that these proposed buildings occupy could be much better used to provide additional public parking and open parkland. If located far enough up river, these additional parking spaces would be better suited to park use, as opposed to commuter parking, due to its distance from access to greater Georgetown.

The Chesapeake Paddlers Association, Inc., through the hard work of some of our members, has had great success with working with the states and various counties in both Virginia and Maryland in improving water access for non-motorized boaters. In many cases, we have greatly expedited various projects by educating the various agencies involved in how little is really needed in the way of improvements to provide public access. Many plans, though well meaning, are far more elaborate, time consuming, and expensive than need be. Once the basic access is in place, it can be opened to the public, and further improvements can be added later if desired and as funds become available.

I hope that you will consider these suggestions in this much anticipated project.



Ralph Heimlich
Coordinator

POG Response Drafting Committee

Rich Stevens- Treasurer
Rob Pearlman- Pirates of Georgetown
Jesse Aronson- Pirates of Georgetown

Chesapeake Paddlers Association, Inc.
<http://www.cpakayaker.com>

Potomac Kayak Club—Correspondence 47

Hi,

I'm writing in regards to your proposed plans. Eliminating the existing Key Bridge Boathouse and its tiny parking lot.

Only crew teams would benefit from the Park Service plans.

Paddlers need a Put-in, Parking, and a Porta John. The Park Service proposals do not provide these and therefore fail to meet their own stated goal of increasing access to the river. Only a tiny group of University and high school rowers would benefit from these proposals. On-site paddler parking is essential.

The Boathouse Zone Development Plan should be to establish a Potomac River recreation zone that more fully supports non-motorized recreation, increases access to the river, improves functionality of the Capital Crescent Trail as it connects to the Georgetown Waterfront Park, and respects the historic character, natural resources and existing recreational use of the C and O National Historic Park and Rock Creek Park.

It doesn't take a rocket scientist to view the plans to realize that the National Park Service is not working for the average citizen. Specifically, the Park Service plans do not support non-motorized recreation and actually reduce access to the river for the majority of non-motorized boaters.

Thank you for your time.

Representative of a very active kayaking group.

Washington Kayak Club—Correspondence 54

The Park Service says its goal in Georgetown is to increase public access to the Potomac River - but the plans you propose would DECREASE access for the vast majority of users of non-motorized boats.

All three alternatives suffer from the same glaring, fatal flaw: no parking. It should be instantly obvious that paddlers need parking.

Instead, you propose a reverse-Robin-Hood scheme in which tax dollars extracted from working Americans will be used to subsidize a very small group of rowers at two of the nation's wealthiest, most elite private universities. Presumably the university and high school rowing teams won't need parking because they will store their boats at the boathouses and use buses to drop off their rowers and pick them up. With endowments of \$1.5 billion (Georgetown) and \$1.6 billion (George Washington), the universities could conceivably transport each rower by limousine.

But for the thousands of recreational paddlers, your plans take away the existing Key Bridge Boathouse and its small parking lot and replace them with ... NO PARKING and therefore, no practical way to launch kayaks, canoes, or stand-up paddleboards.

The Washington Kayak Club has over 900 members, Chesapeake Kayak Adventures has over 1,500 members, the Chesapeake Paddlers Association has 700 members, and the Watersedge kayak club has over 1,000 members. Many other paddlers venture out on their own or in small groups, without belonging to any clubs. By contrast, the enormous boathouses and docks you propose would be used almost exclusively by a few dozen crew team members, despite occupying enormous amounts of land.

You do propose a beach. That would be a great rest stop for paddlers who launch elsewhere, but the lack of parking completely dooms Georgetown as a launch site. Your maps show new proposed parking along Water Street, but that is up to the D.C. government, not the Park Service - and it's very unlikely that any street parking would be restricted to paddlers.

If you are serious about providing a launch site for paddlers, you MUST provide on-site parking that is restricted to paddlers.

One way to do this would be to move the Washington Canoe Club building upstream (the building has been moved several times before). It could be moved to the most upstream end of the study area, or even further. (It's not clear why the study area ends where it does, as the land upstream of that point also seems to belong to the Park Service.)

Picnic areas and habitat enhancement could be provided along the newly extended road, along with parking spots restricted to paddlers. Or, if there's not enough room for that, move the picnic areas and habitat enhancement upstream of the study area and upstream of the relocated Canoe Club, with a footpath rather than a road leading to the picnic area.

Your maps of Alternatives 2 and 3 make no sense, as they show a kayak launch area upstream of the Canoe Club, with no practical way to get to the launch site. Either paddlers would drive across the Canoe Club patio, destroying that wonderful open space, or they would have to search for a place to briefly park (illegally?) somewhere just downstream of the Canoe Club without blocking others (where would that be?), struggle to carry their boats to the launch site, and hope to return to their cars before they got ticketed or towed. Has anyone at the Park Service ever launched a kayak, or even thought through how this would work?

Perhaps at the next public meeting, a Park Service representative could explain just how you envision Joe or Josephine Kayaker launching a kayak using any of your three alternatives. Trying to explain the process out loud might make clear how ludicrous it is.

Of course, space is limited on the Georgetown waterfront. If on-site parking for paddlers is truly impossible, there are two alternatives that seem simpler and cheaper:

1. Fletcher's Cove: Improve vehicle access to Fletcher's Cove, making that a primary Potomac launch site for kayakers, canoeists and stand-up paddlers. This would require lowering the road under the C&O Canal, so that SUVs with boats on top can get through, and easing the difficult access from Canal Road.
2. Hains Point: Create a beach there (perhaps on the Washington Channel side, to reduce erosion).

If the Park Service did either of these simple measures to increase Potomac access for paddlers, then merely having a rest stop in Georgetown wouldn't be so bad. But the current proposals are unfair. Whether measured by tax dollars spent, by access provided, or by the amount of scarce shoreline devoted to each sport, all three current proposals amount to pandering to one extremely small group - rowers - at the expense of thousands of paddlers.



Potomac River Yacht Clubs Association



www.pryca.us

Jon James, Acting Superintendent
National Park Service

Mr. James:

The Potomac River Yacht Clubs Association, which represents 21 sailing and power boat clubs in the District of Columbia and the Maryland and Virginia sides of the Potomac River, would like to go on record as agreeing with the need for facilities to support non-motorized water activities but opposed to the Georgetown Nonmotorized Boathouse Zone Development Plan as it is currently proposed in Alternatives 1, 2 and 3.

While the Association recognizes and agrees with the need for additional facilities to support non-motorized water activities, we are concerned that none of the three current alternatives takes into consideration the need for docking facilities for small dinghies, both rowed and powered.

Therefore, we propose an Alternative 4, a modification of low or medium density use. We suggest that the 13,800 sq. ft. boathouse downriver from the Key Bridge not be developed, and that a dock for dinghies be built instead.

Currently, there are no docking facilities available or proposed in the alternatives to support dinghies coming to shore from boats anchored nearby. The Georgetown Wall area is not safe for small dinghies; it is already overcrowded, and the space for recreational power boats has been reduced to allow for more commercial tour boats to tie up. Because of this crowding, recreational boats anchor out, and their owners and guests must dinghy to shore to visit waterfront restaurants. Additionally, recreational boaters anchor out overnight above the Key Bridge to enjoy the serenity of that area, and these also have reason to dinghy to shore to access the waterfront to walk their dogs, pick-up/drop-off guests, etc.

There is currently no safe way for dinghies to come ashore; however, a timely modification of the Georgetown Nonmotorized Boathouse Zone Development Plan offers the perfect opportunity to address this deficit. The area down-river from Key Bridge could be developed to include dinghy docks, along with reduced facilities for other non-motorized craft. It would also have a walkway installed that connects to the Georgetown Waterfront Park and through that to the up-river end of the "Wall".

The Association appreciates your consideration of our suggestions.

Robert Blunt
Commodore, PRYCA

Prince William YC—Correspondence 112

On behalf of the Prince William Yacht Club who routinely use the anchorage north of the Key bridge for power boat anchoring, we support the No Action Alternative.

Rock creek Rowing, Inc.—Correspondence 85

Thank you for the opportunity to provide comments on the development plans for the non-motorized boathouse zone along the Georgetown waterfront. The rowing community welcomes the prospect of much needed safe access to the river.

Rock Creek Rowing is a not-for-profit 501(c)(7) organization formed to support a competitive masters rowing program. We have approximately 50 members and are the only competitive masters club other than Potomac Boat Club in the Georgetown area. Our club uses Thompson Boat Center along with 14 high schools and 2 college teams.

We are very supportive of increased boat storage and use options beyond Thompson Boat Center. The overcrowding at this public facility not only creates a safety issue but precludes access to boaters of all kinds, including sweep and sculling programs, canoeing, kayaking, and paddle boarding. Our club, after many years on a wait list for rack space, has been unable to procure any storage racks for four or eight person boats, the mainstay of a competitive program. Many high school programs face similar storage and use problems because of the overcrowding and are forced to cap their rowing programs and to cut athletes from their teams in accord with the limited number of boats they can store and launch from Thompsons.

Rock Creek Rowing strongly supports the high density development plan for the non-motorized boat house zone to add much needed boat house and storage space and water access. This plan will allow the hundreds of boaters that use the river on a daily basis, safer and more open access to the river, an incredible resource for the public. Given the acute and significant need for space and safe water access, we feel that the medium and low density plans will not meet the current needs of the boating community and will not be adequate to allow for future growth of rowing programs.

We realize that details of each of the proposed plans will need additional consideration and offer our specific comments based on our experience rowing from Thompson Boat Center:

- We enthusiastically support college or private ownership of one, or at most two boathouses. We strongly suggest that there are assurances that they will not, however, be sole use space. Agreements that include accommodations to make some space available to high school or masters programs should be established during the planning process. An example of a long standing shared agreement is the Potomac Boat Club's housing of the Washington and Lee High School rowing program. Both entities benefit from this situation. Additional space is a crucial need, and a boathouse on the river in or near public space is a privilege for any/all rowers. Sole ownership and use of new boathouses will create a situation that would not provide adequate relief for the significant overcrowding at Thompsons.
- We suggest that the space furthest upriver, where parking access will be the greatest challenge, be considered most appropriate for those teams who will have the lowest daily parking use needs. For example, Georgetown University is mostly foot traffic and some nearby high schools such as Wilson, Georgetown Visitation, Georgetown Day School, the National Cathedral School, and St. Albans have easy access to public transportation and would have less impact on parking.
- New facilities should be built to be energy efficient and allow year round access.
- Whereas the importance of additional boat space and access cannot be underestimated, the maintenance and upkeep of Thompson Boat Center should be considered in the planning process. It is very likely, given the current extreme overcrowding, that even the high density plan will not relieve fully the overuse issue at Thompsons. Thompsons is in need of significant repairs and a more sustainable maintenance plan. In addition, the building has no heat or water during the off season and therefore the building is not accessible. Winter access would provide space for off season training, a potential revenue stream for the facility.
- Protected, indoor, space is optimal for safe equipment storage. We would support, however, access to outdoor storage in the event that the high density plan is not selected.

Bay Kayaking, Inc.—Correspondence 48

Recommend Alternative 2 because it is the only one that has a cartop drop off location. Next choice would be Alternative 3 because of the proximity of canoe/kayak launch.

There are very few kayak launches in the Metropolitan area and recreational kayaking is the fastest growing water sport, especially if kayak fishing is included in those statistics.

Would it be possible for the Universities that want to build a boathouse to partner with the Washington Canoe Club which is in disrepair and need of financial assistance? Sounds like a win-win to me. I have previously commented on the options for the Georgetown waterfront. I failed to previously recognize the total lack of parking and ability for car top boat users to access the water because they lack a place to leave their vehicle while unloading or park once on the water.

Parking must be addressed for your plan to be useful to the vast majority of water access users. The two fastest growing water sports is recreational kayaking and kayak fishing. Your current plans make your waterfront park useless to the fastest growing segments.

Chesapeake Kayak Adventures—Correspondence 55

The National Crew Memorial

The National Park Service brochure and website state that the purpose of the Georgetown Non-motorized Boathouse Zone Development Plan "is to establish a Potomac River recreation zone that more fully supports non-motorized recreation, increases access to the river, improves functionality of the Capital Crescent Trail as it connects to the Georgetown Waterfront Park, and respects the historic character, natural resources and existing recreational use of the Chesapeake and Ohio National Historic Park and Rock Creek Park".

It doesn't take more than a few minutes studying the plans to realize that the National Park Service is lying, incompetent, setting goals and objectives beyond its ability and resources, or some combination of the previous three. Specifically, the Park Service plans do not support non-motorized recreation and actually reduce access to the river for the majority of non-motorized boaters.

Consequently, the half million non-motorized boaters in the Washington/Baltimore/Arlington Statistical Metropolitan Area (W/B/A SMA) have no option other than to support the No-Action Alternative proposed by the National Park Service.

None of the three action alternations does anything - - not one single thing - - to benefit 99.8% of non-motorized boaters in the area.

It doesn't take 25 years of studies and planning to discover that there are more than a half million people in the W/B/A SMA who participate in non-motorized boating every year. These statistics are readily available on the Internet from both government and private industry sources including the United States Coast Guard, and various outdoor foundations and associations. It does take a couple hours of research to find them.

These half million non-motorized boaters need three things: a place to park the vehicle that got their non-motorized boat to the water, a rest room and a soft launch for their non-motorized boat. None of the three action alternatives addresses all three of these needs.

The high-density option does offer 900 feet of docks, which begs one to wonder if anyone at the National Park Service has ever gotten into or out of a non-motorized boat. After all, 99.8% non-motorized boaters don't use docks.

The three alternatives only benefit the "other" 0.2% non-motorized boaters. These would be the slightly over 100 students listed on the rowing team rosters of Georgetown and George Washington Universities and the students at a number of area high schools who would also use the facilities. We are talking less than a couple thousand people.

I have nothing but respect for the rowing teams and their right to use the area. They have a history on the Georgetown Waterfront. I am an advocate for restoration of the Washington Canoe Club. The three alternatives, however, benefit no non-motorized boaters other than rowers, so let's call it what it really is, The National Crew Memorial.

The National Park Service has no business using taxpayer dollars to assist two of the wealthiest universities in the country, each with billions of dollars in endowments, to establish The National Crew Memorial. Georgetown and GWU can afford to do this on their own.

The NPS would be better off using the vast resources this project will require to support the President's Executive Order calling for 300 new public access points to the Chesapeake by 2025.

<http://executiveorder.chesapeakebay.net/page/About-the-Executive-Order.aspx>. The Georgetown Non-motorized Boathouse Zone doesn't even meet the criteria to be considered part of the executive order.

Chuck McMillin
Executive Director
Chesapeake Kayak Adventures
<http://www.meetup.com/Chesapeake-Kayak-Adventures/>

DC Cruises, LLC—Correspondence 136

I welcome the opportunity to comment on this proposed development plan. As an operator of commercial tour boats, picking up and discharging passengers at the Georgetown harbor waterfront, I believe that DC Cruises has an important perspective on the use and development of this historic and natural area.

In a season lasting from March to November each year, DC Cruises alone brings an average of approximately 1000 passengers a week, both visitors and local residents, to the Potomac gorge north of the Key Bridge. Our live narrated tours educate passengers about the history and natural resources of the area, including the Georgetown waterfront, Theodore Roosevelt Island, and the three sisters. Tours begin in March with thousands of visitors coming to view the new growth and flowering local trees, and continue through October and November with narrations highlighting the fall foliage. Several other companies, from both DC and Virginia, also bring their boats north of the Key Bridge.

We support the responsible use of this historic navigable waterway by all users, motorized and non-motorized. Our concern is that any land-side development, such as the various plans proposed in this notice, while increasing the access for small craft recreation on the river, not restrict access to the river for the large number of visitors who come to enjoy the area by powered craft, whether commercial or private. After all, not all visitors are capable of paddling a kayak or rowing a scull.

In conclusion, this historic navigable waterway has been shared for hundreds of years, both commercially and recreationally, by many different types of users. The current mix strikes a fine balance, allowing access to visitors of all ages and abilities without compromising the environment in any way. Any development should continue this successful pattern into the future.

Thank you,

Christopher Snow
Director of Operations
DC Cruises, LLC

Anne Arundel Trail Committee—Correspondence 144

Ms. Tammy Stidham
Chief, Planning, Compliance & GIS
Georgetown Nonmotorized Boathouse Zone Development Planning
1100 Ohio Drive SW
Washington, DC

Dear Ms. Stidham,

I am writing in response to the request for public comments on the January 2015 NPS Georgetown Nonmotorized Boathouse Zone Development Plan. I am a sea kayaker and have been kayaking in DC/Virginia/Maryland area since 2003. I am also the Chair of the Anne Arundel County Water Trail Committee <http://www.aacwt.org> and a member of the Anne Arundel Public Water Access Committee http://www.aacounty.org/RecParks/launch/water_access.cfm. As such, I have sound experience in what it takes to make water access public water access. The NPS plans to develop water access on the Georgetown waterfront do not create public water access. Rather, these NPS plans use public funds to develop de facto private water access for the benefit of the crew teams at affluent private universities.

We have found that public water access requires 4 basic things:

- 1) an open gate
- 2) ample parking
- 3) a short carry to the waterfront
- 4) a portapotty

Kayakers need parking to load and unload their kayaks and leave their cars while out on the water for indefinite periods of time. There is little existing parking in Georgetown near the NPS site. The NPS Plan does not create parking. This total lack of parking effectively limits the use of this proposed access point to the private universities that will use the boathouses in the NPS plan.

Kayakers also do not need boathouses. Most of us store our kayaks in our garages, back yards or storage sheds. I have 3 kayaks in the basement of my split-level house. The general public does not need the boathouses and extensive floating dock system to launch kayaks. We need only a small section of non-hardened shoreline. In Anne Arundel County we recently created a great kayak launch site from 27 feet of shoreline in an existing park:

<http://southriversource.com/2014/07/30/hot-shots-shady-side-park-opens-water-access-point-to-the-public/>

Two alternatives would provide true public water access:

- 1) Put public parking on Site A, Site C, Site D and Site E rather than use public money and public land to build expensive boathouses and floating docks for private universities.
- 2) Do nothing with the Georgetown waterfront and instead use the public funds to provide public water access at a better location, such as Haines Point.

Using public money to build de facto private facilities for private universities is a misuse of the public purse and an abandonment of the principles of the National Park Service.

I am also sending these comments to my federal elected officials.

Sincerely,

Lisa Arrasmith, Chair
Anne Arundel Water Trail Committee

<http://www.aacwt.org>
waterbug@smart.net

cc: President Barack Obama
Senator Barbara Mikulski
Senator Ben Cardin
Representative Dutch Ruppersberger