

APPENDIX



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APPENDIX A: REFERENCES

Federal and State Laws and Regulations

Clean Water Act of 1972, as amended.

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Boathouse information:

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Thompson Boat Center. <<http://www.thompsonboatcenter.com>>

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Washington Canoe Club. <<http://www.wcanoe.org>>

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APPENDIX D: LIST OF ACRONYMS

B&O Railroad	Baltimore and Ohio Railroad
CCT	Capital Crescent Trail
C&O Canal	Chesapeake and Ohio Canal
C&O Canal NHP	Chesapeake and Ohio National Historical Park
CE	Categorical Exclusion
CEQ	Council on Environmental Quality
CFA	Commission of Fine Arts
CFR	Code of Federal Regulations
CWA	Clean Water Act
DC	District of Columbia
DC WASA	District of Columbia Water and Sewer Authority
DC DOH	District of Columbia Department of Health
DDOT	District of Columbia Department of Transportation
DO-12	NPS Environmental Compliance Field Guide - Director's Order 12
EA	Environmental Assessment
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
ESA	Endangered Species Act (Federal)
FEMA	Federal Emergency Management Agency
GLOC	Georgetown Local Organizing Committee
GWMP	George Washington Memorial Parkway
GWU	George Washington University
GUTS	Georgetown University Transit System
HVAC	Heating, Ventilation and Air-Conditioning
FAR	Floor Area Ratio
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
MDDNR	Maryland Department of Natural Resources
MOA	Memorandum of Agreement
NCAA	National Collegiate Athletic Association
NCPC	National Capital Planning Commission
NEPA	National Environmental Protection Act of 1969
NHPA	National Historic Preservation Act
NPS	National Park Service
PBC	Potomac Boat Club
PID	Photoionization Detector
PQL	Practical Quantization Limits
RT&E	Rare Threatened & Endangered

SAV	Submerged Aquatic Vegetation
SHPO	State Historic Preservation Officer
TBC	Thompson Boat Center
TPH	Total Petroleum Hydrocarbons
USGS	United States Geological Survey
USACOE	United States Army Corps of Engineers
USPP	United States Park Police
VOC	Volatile Organic Compounds
WCC	Washington Canoe Club
WMATA	Washington Metropolitan Area Transit Authority
W-O Zone	Waterfront Open Space Zone

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APPENDIX F – SUMMARY OF COMMENTS RECEIVED DURING SCOPING

The following table provides a summary of all the comments that were received during the public scoping process. The comments have been categorized in relationship to where they are addressed in the Environmental Assessment. For example, comments received regarding the background of the project are addressed under Chapter 1 (Description of the Purpose and Need) of the EA. Similarly, comments received regarding hydrological (or other environmental) resources are addressed either under Chapter 3 (Affected Environment) or Chapter 4 (Environmental Consequences) of the EA. The specific section of the EA providing information on each comment is listed in the response column.

COMMENTS RELATED TO CHAPTER 1 (DESCRIPTION OF THE PURPOSE AND NEED)

Category	Issue	Response
Background Information	<ul style="list-style-type: none"> • Goal of NPS / C & O Canal Park. • Why are EAs for land swap and boathouse separate? The land swap EA is more than 9 years old and outdated. • Any written restrictions on Georgetown University’s use of the land? • Demand for rowing – impact on rowing community if delayed. • Consistency with C & O Canal Park mandate and mission. • Relationship to NPS mission. • Was the land exchange of equal value? Land appraisal should be provided for both sites. A copy of the financial agreement between GU and NPS is requested. • This is a case of private use of public land. • Retain land in public ownership. 	<ul style="list-style-type: none"> • See EA Section 1.2 • First EA dealt with concept of land exchange and is still valid as conditions have not changed; second EA deals primarily with the boathouse design and construction and related impacts. • See EA Sections 3.1.3 and 4.1.3 • See EA Section 1.2 • See EA Section 1.2 • The park purpose statement for C&O Canal GMP provides for recreational access to the Potomac River. • According to NPS, the value of the two sites is equal because the land value of the GU parcel is unrestricted and the NPS parcel will be restricted to boathouse use only. Appraisals are confidential and not available (even under FOIA). No other agreements have been made between the two parties. • See EA Sections 3.1.1 and 4.1.1 • According to NPS, retaining the NPS parcel in public ownership would leave the upstream (GU) parcel in private ownership with the threat of private development in the future.

<p>Process</p>	<ul style="list-style-type: none"> • Ensure appropriate distribution/notification. • Ensure document is tiered, not segmented. • Prepare analysis of entire waterfront area to identify alternative sites and cumulative impacts. • Why was an EIS required for the Arlington boathouse? Could it be required here? • An EIS should be prepared. The following factors meet Do-12 criteria for an EIS: unique characteristics of the area; degree to which public safety and health are impacted (safety hazards for CCT and towpath users, especially during regattas); degree to which impacts are likely to be highly controversial; precedent for future actions (no private structure has been constructed in the C&O Canal NHP since its inception). • What is the difference between an EA and an EIS? • Evaluate decision of significance of impact in accordance with CEQ 1508.27. • John Parsons/Sally Blumenthal should recuse themselves from the NEPA process. <ul style="list-style-type: none"> • EA should be posted on the NPS website. • Provide full time-line from 1985. 	<ul style="list-style-type: none"> • See EA Section 1.5 • See EA Sections 1.6 and 4.6 • See EA Sections 1.6, 2.5 and 4.6 <ul style="list-style-type: none"> • See EA Section 1.9 <ul style="list-style-type: none"> • See EA Section 1.9. An EIS still could be required if determined necessary or warranted by NPS based on the results of the EA. <ul style="list-style-type: none"> • See EA Section 1.9 • See EA Chapter 4 <ul style="list-style-type: none"> • NPS has designated Kevin Brandt, Superintendent, Chesapeake and Ohio Canal National Historical Park, as the NPS representative responsible for this document. <ul style="list-style-type: none"> • See EA Section 1.5 • See EA Section 1.2
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<p>Boathouse Program</p>	<ul style="list-style-type: none"> • Parties/weddings at the boathouse. • Exclusive use of boathouse by a private university. • Change (reduce footprint) to create space for unaltered towpath, unshared hiker-biker path and needed fire/access lane. • Facility size is out of proportion for need. • Do rowing tanks have to be on site? Concerned with use of chlorine. • What is the relationship between the floor level of the boathouse and the dock? • Hours of operation. • Need verses wants of Georgetown University. • Why the need for high ceilings which are driving height? • Height of boat stacking area is too high? • Insufficient boathouse storage space in the area. Growing interest at high school level. Woodrow Wilson Senior H.S. has grown from 60-95 students in the past three years. Recent construction of Swedish Embassy has reduced storage space at TBC. • This enormous structure would only free up limited number of spaces at TBC. What is the minimum size and height structure required to provide public benefit derived by removing GU's shells from TBC. 	<ul style="list-style-type: none"> • See EA Sections 2.1, 2.2 and 2.3 • See EA Sections 2.1 and 4.1.1 • See EA Sections 2.3, 2.5 and 4.1.2 <ul style="list-style-type: none"> • See EA Section 1.4 • See EA Sections 1.4 and 2.5 <ul style="list-style-type: none"> • See EA Figure 4-1 <ul style="list-style-type: none"> • See EA Sections 2.1, 2.2 and 2.3 • See EA Section 1.4 • See EA Section 1.4 <ul style="list-style-type: none"> • See EA Section 1.4 • Comment noted <ul style="list-style-type: none"> • See EA Sections 1.3 and 1.4
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	<ul style="list-style-type: none"> Any new boathouse should have a public benefit component – public use of any new dock or launching platform, community or high school use of some space in the building, or improvement of nearby shoreside infrastructure such as trails, etc. 	<ul style="list-style-type: none"> Proposed Action will allow public access to waterfront; GU is planning to provide high school rowing programs during the summer. See EA Sections 2.1, 2.2 and 2.3
	<ul style="list-style-type: none"> How many days in a year is it necessary to use the rowing tank? 	<ul style="list-style-type: none"> See EA Sections 2.1, 2.2 and 2.3
Cumulative Impacts	<ul style="list-style-type: none"> A programmatic EIS to address cumulative impacts of all boathouses proposed, on views, parking, bike, pedestrian and auto traffic, and river use. Expansion of Thompsons. 	<ul style="list-style-type: none"> See EA Sections 1.6, 1.9 and 4.6 See EA Section 2.5

COMMENTS RELATED TO CHAPTER 2 (ALTERNATIVES CONSIDERED)

Category	Issue	
Alternatives	<ul style="list-style-type: none"> Use Dempsey site. Dempsey’s site is too small and would cause unacceptable congestion on the water for both WCC and PBC. Locate along Anacostia Waterfront. Anacostia is not a valid option – GU rowers require a non-motorized means of access and travel time would have a serious negative impact on program. Georgetown waterfront east of Key Bridge. Immediately downstream from GWU’s site though not through a land exchange but through a long-term lease where NPS retains ownership of land. Joint boathouse for Georgetown and George Washington Universities. Universal boathouse below Key Bridge for GU, GWU and high schools. On Virginia side on NPS land. Explore dock designs that can eliminate the additional extra length into the river. Current plus originally proposed. Can the Washington Canoe Club be moved upstream? Need for services for visitors on Capital Crescent Trail. Discuss public use of boathouse for events (evening). Is upriver site buildable? Demonstrate the feasibility of building at that site. Preserve land east of 34th Street to Washington Harbor as a park – opposed to expanding the boathouse zone to the east. 	<ul style="list-style-type: none"> See EA Section 2.5 See EA Sections 2.1, 2.2 and 2.3 Comment noted Not part of EA scope Services for visitors for CCT are available at the Boathouse at Fletcher’s Cove and in Georgetown See EA Sections 2.1, 2.2 and 2.3 See EA Section 2.5 See EA Section 2.5

	<ul style="list-style-type: none"> • Smaller size without rowing tanks and exercise spaces. • Height should be no higher than Canoe Club. • Use of Fletcher’s Boathouse • Partnership between NPS and GU to construct a boathouse. 	<ul style="list-style-type: none"> • See EA Section 2.5 • See EA Section 2.2 • See EA Section 2.5 • NPS has final approval for construction of the proposed boathouse (and any other facilities) within their property. There is no formal “partnership” for this purpose.
	<ul style="list-style-type: none"> • Impact on Metro if Alternative site is chosen. • Redevelopment of TBC. • If NPS should build a new facility, it should accommodate sweep boats not already accommodated at TBC. • Public bathrooms, amenities, cabanas. 	<ul style="list-style-type: none"> • See EA Sections 3.3.2 and 4.3.2 • See EA Section 2.5 • Comment noted • Public restroom facilities, etc. are not planned as part of the proposed boathouse. However, public access is required on the site.

COMMENTS RELATED TO CHAPTER 3 (AFFECTED ENVIRONMENT) AND CHAPTER 4 (ENVIRONMENTAL CONSEQUENCES)

Category	Issue	
Land Use	<ul style="list-style-type: none"> • Impact on existing fishermen. • Number of users along Capital Crescent Trail and River, and how it has increased since the land exchange (EA). • Open/Green space impact and impact of public access to river. • Impact on Canoe Club, Jack’s Canoe and other current programs. • Impact on C & O Canal Park/Park users. • Locating a boathouse in a park is appropriate – numerous examples across the country. Rowing is a recreational use which is one of the primary uses for public parks. • Impact on C & O Canal visitor experience. • Property should return to public use if GU becomes fiscally insolvent and wants to sell the property. NPS may want to add restrictions to use in case boating is no longer popular in 50 years. 	<ul style="list-style-type: none"> • See EA Sections 3.1.2 and 4.1.2 • Users have undoubtedly increased but no specific data are available. See Sections 3.3 and 4.3. • See EA Sections 3.1.2, 3.4.3, 4.1.2 and 4.4.3 • See EA Sections 3.1.4 and 4.1.4 • See EA Sections 3.1.2, 3.2, 4.1.2 and 4.2 • Comment noted • See EA Sections 3.1.2, 3.2, 4.1.2 and 4.2 • W-O Zoning designates allowed uses for the property (See EA Sections 3.1.3 and 4.1.3)
Socio-Economic Resources	<ul style="list-style-type: none"> • Economic impacts on Georgetown. 	<ul style="list-style-type: none"> • See EA Section 1.8

<p>Planning Policies</p>	<ul style="list-style-type: none"> • C & O Advisory Commission policy not to have development between Canal and River. • Update Old Coast Guard study of river usage/safety. 	<ul style="list-style-type: none"> • According to NPS, there are other recreational facilities between the canal and the river, including public and private development in Georgetown, Cumberland, Williamsport and Brunswick. The C&O Canal GMP allows for this type of use. • See Proposed Mitigation Measure under EA Section 4.3.4
	<ul style="list-style-type: none"> • Why is there a boathouse zone? • Georgetown Waterfront Park Plan - Specifies 4,000 square feet. Should boathouse zone be changed? • Inconsistent with NCPC's Federal Elements that states that, "C&O NHP should be preserved...and also serve as a recreational area...although preservation should take precedence." • Precedence of allowing one school to acquire a large parcel on park land for exclusive use raises a question of whether other schools will request similar parcels. Should NPS encourage placing a new boathouse for private use rather than public use in national parks. • Waterfront issues related to goals of the DC Comp Plan. • Only 3 miles of the C&O Canal NHP are within DC boundary and should remain within public domain. 	<ul style="list-style-type: none"> • See EA Section 1.2 • See EA Sections 3.1.3 and 4.1.3 • See EA Sections 3.1.3 and 4.1.3 • See EA Sections 3.1.1 and 4.1.1 • See EA Sections 3.1.3 and 4.1.3 • Comment noted
<p>Historic</p>	<ul style="list-style-type: none"> • Impact on Canoe Club, Canal. • Consider historic scale of Georgetown and waterfront. • NPS standards for maintenance of historic structures? • Section 106 process. • History of entire waterfront and system of river use. • Prior use of land and environmental impacts (past century, docks/historical ports). 	<ul style="list-style-type: none"> • See EA Sections 3.2.1 and 4.2.1 • See EA Sections 3.2.1 and 4.2.1 • See Section 4.2.1 • See Sections 4.1.3 and 4.2.1 • See EA Sections 3.2.1 and 4.2.1 • See EA Sections 3.2.1 and 4.2.1
<p>Visual Resources</p>	<ul style="list-style-type: none"> • Impact on views from tow path, from Potomac River, from Virginia side, from Rosslyn, Key Bridge. From Key Bridge all you see is trees on the upriver side. • Impact on Gateway to Capital Crescent Trail. Tunnel effect along CCT. • Views of Roosevelt Island and Aqueduct from CCT/tow path. • Add green roofs along all boathouses to minimize visual impacts. 	<ul style="list-style-type: none"> • See EA Sections 3.2.2 and 4.2.2 • See EA Sections 3.2.2 and 4.2.2 • See EA Section 4.2.2 • GU and its architects determined that a pitched roof was a more appropriate design for a proposed building in the Georgetown Historic District.

	<ul style="list-style-type: none"> • Transition from Canal to City is a crucial part of the experience which would be diminished by a structure that is too high and large. • The views from C&O Canal will be marred for several seconds, but those views are already marred for the entire portion in Georgetown. • Evaluation on whether the change in views is consistent with C&O Canal NHP plan and DC Comprehensive Plan. How many users will be affected by the changed views; how many months of the year will these views be affected. 	<ul style="list-style-type: none"> • See EA Sections 3.2.2 and 4.2.2 • See EA Sections 3.2.2 and 4.2.2 • See EA Sections 3.2.2 and 4.2.2
Vehicular Traffic and Parking	<ul style="list-style-type: none"> • Bringing boats down during regattas. • Impact of parking for social events. • Impact of access drive on trail, Canal bank and Washington Canoe Club. • Safety concern due to conflicts between boat trailers and other trail users. • Access/parking for crew boat trailers. • Capital Crescent Trail will be the size of a roadway and will no longer be a “trail”. • Will deconstruction of Whitehurst Freeway affect this project? • Impact of widening Canal Road. • Maintain access to both trail and towpath during construction. • Consider river barges during construction. • Traffic impact in Georgetown due to construction vehicles. • Engineering studies to determine impact on WCC from large construction trucks and boat trailers that could potentially hit the building. • Provide detailed counts of trail users at different times of the day/seasons. 	<ul style="list-style-type: none"> • See EA Sections 3.3 and 4.3 • See EA Sections 3.3 and 4.3 • See EA Section 4.3.1 • See EA Sections 3.3 and 4.3 • See EA Sections 3.3 and 4.3 • See EA Sections 3.3 and 4.3 • See EA Section 4.6 • Currently there are no plans to expand Canal Road in the vicinity of the project site. • See EA Sections 3.3 and 4.3 • The shallow river depth adjacent to the project site will not allow use of barges during construction. • See EA Sections 3.3.1 and 4.3.1 • Standard construction practices will be used to avoid any impacts to WCC. See Section 4.3.1. • Data not available and not within scope of EA. See Section 4.3.1 for potential trail user impacts.
River Navigation/ Use	<ul style="list-style-type: none"> • Conflict between users (rowers row backwards, canoes paddle forward). • Safety of canoes, kayaks and small boats that were protected by safety guidelines on the DC side versus guidelines of rowing along the VA shore. • Impact on canoe/kayak training and racing courses. • Impact on paddlers due to (1) docks, and (2) increased use of the river. • Potential conflict during afternoons particularly from April to November. 	<ul style="list-style-type: none"> • See EA Section 3.3.4 and 4.3.4

	<ul style="list-style-type: none"> • “Traffic study” type of analysis for river use. • Mediation techniques including management of boating lanes should be discussed in EA to resolve user conflicts. • Wakes from coaches boats – would wakeless boats be used? 	<ul style="list-style-type: none"> • See EA Section 3.3.4 and 4.3.4 • See EA Section 3.3.4 and 4.3.4 • See EA Section 3.3.4 and 4.3.4
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<p>Hydrological Resources</p>	<ul style="list-style-type: none"> • Flood water would be channelized behind the building and would magnify the force of water resulting in damaging the Canal embankment and WCC. • On average the Potomac floods once every 12 years. Impacts on river including depths, flows, and riverbed contours; potential for riverbed changes due to deposition and scour of sediment and the need for dredging. • Impact of dock and bank riprap on river bank, area boathouses. Consult environmental review for Clyde’s floating boat proposal. • Fast moving flood waters could form eddies or backwater that can fill up with trees, and other debris. These materials would essentially constitute a number of battering rams and would damage/destroy WCC. Such an eddy could result from the fixed portion of the dock. • Impact of ice. • Impacts related to stormwater. • Green roofs above boathouse for stormwater management. • Increased run-off including chemicals and hazardous materials used during construction that would wash into the river; chemicals, oils and other substances including chlorine from rowing tanks would enter the river during floods. Impact on wetlands & functions they serve of filtering water/ providing habitats. 	<ul style="list-style-type: none"> • See EA Section 3.4.1 and 4.4.1 • See EA Section 3.4.2 and 4.4.2 • See EA Section 3.4.1 and 4.4.1 • See EA Section 3.4.1 and 4.4.1 • No impacts are expected from ice. Ice “floods” as occurred during the 19th century are no longer an issue due to upstream dams. • See EA Section 3.4.1, 3.5.1, 4.4.1 and 4.5.1 • This is not being considered by GU because of the design concept suggested in the MOA and the location of the proposed boathouse in an Historic District. See Section 4.5.1 for planned stormwater management system on-site. • See EA Section 3.4.1, 3.4.2, 4.4.1 and 4.4.2 • See EA Section 3.4.1 and 4.4.1
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<p>Geology, Soils and Topography</p>	<ul style="list-style-type: none"> • Silt build up due to docks. • Geotech analysis to determine impact of construction on C&O Canal embankment and WCC. Establish Escrow fund to repair potential damage to Canal/WCC. • Geotech feasibility of constructing on fill. 	<ul style="list-style-type: none"> • See EA Section 3.4.2 and 4.4.2 • See EA Section 3.4.1 and 4.4.1; Appendix F1. • No physical damage to either the Canal or WCC is expected as a result of the Proposed Action. • See EA Section 3.4.1 and 4.4.1; Appendix F1
<p>Terrestrial/ Aquatic Vegetation and Wildlife</p>	<ul style="list-style-type: none"> • Vegetation management – land and water. • Benefit of land exchange to ecosystem. • Impact on PawPaw plants. • Impact of barbed wire fence on wildlife. • Impact on eagles on TR Island. • I have looked at satellite photos – between the site and Wilson Bridge, there is not a single wooded area along the north side of the river with the exception of TR Island. • Removing vegetation eliminates natural shade that cools the City and provides fish and wildlife habitat. • Impact of dock on spawning fish going upstream. 	<ul style="list-style-type: none"> • See EA Section 3.4.3 and 4.4.3 • See EA Section 4.1.3 and 4.4.3 • See Section 3.4.3 and 4.4.3. • No barbed wire fencing is part of the proposed construction or operation of the boathouse. • See Section 3.4.3 and 4.4.3. • Comment noted • Comment noted • See EA Sections 3.4.3 and 4.4.3
<p>Utilities/ Infrastructure</p>	<ul style="list-style-type: none"> • Impact on Dulles interceptor. What would be the public health impact if the corroding of the sewer line results in erupting it? • Can the interceptor be moved? 	<ul style="list-style-type: none"> • See Section 4.5.2. • Interceptor sewer cannot be moved.
<p>Lightscape</p>	<ul style="list-style-type: none"> • Affects on wildlife, night light. 	<ul style="list-style-type: none"> • See EA Sections 3.4.3 and 4.4.3. Species near the site are typical of urban/suburban areas and not negatively impacted by nightlight.
<p>Other</p>	<ul style="list-style-type: none"> • Discuss maintenance of the grounds. • Duration of construction. 	<ul style="list-style-type: none"> • GU is responsible for maintaining the grounds around the proposed boathouse. • See EA Section 4.3.1