

National Park Service

U.S. Department of the Interior

ROCK CREEK PARK/
CHESAPEAKE & OHIO CANAL NATIONAL HISTORICAL PARK

WASHINGTON, DC



FINDING OF NO SIGNIFICANT IMPACT

GEORGETOWN NONMOTORIZED BOATHOUSE ZONE DEVELOPMENT PLAN AND ENVIRONMENTAL ASSESSMENT

Rock Creek Park

Chesapeake & Ohio Canal National Historical Park

Washington, DC

INTRODUCTION

The National Park Service (NPS), with the District Department of Transportation (DDOT) and National Capital Planning Commission as cooperating agencies, prepared an environmental assessment (EA) to evaluate the development of facilities within a nonmotorized boathouse zone located along the District of Columbia side of the Potomac River in the Georgetown neighborhood. The zone, extending 80 to 100 feet landward of the shoreline along approximately 1,500 feet of river frontage, is located within NPS-administered land in the Chesapeake & Ohio Canal National Historical Park (C&O Canal NHP) and in Georgetown Waterfront Park, which is part of Rock Creek Park. The purpose of this project is to establish a Potomac River recreation zone that more fully supports nonmotorized 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 C&O Canal NHP and Rock Creek Park. The project is needed because public access points for nonmotorized boating and paddle sports along the Georgetown waterfront are limited, and popularity of nonmotorized water sports (canoeing, kayaking, rowing, paddle boarding) is increasing; capacity at current boathouse facilities that provide access to the river and related amenities (i.e., boat storage, concessions, access facilities, boat rentals, beach, and docks) is insufficient; and the current configuration of the CCT and its connection to Georgetown do not provide safe and compatible access for pedestrians and cyclists with motorized vehicles to and through the zone.

The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), the regulations of the Council on Environmental Quality for implementing NEPA (40 Code of Federal Regulations [CFR] 1500–1508), and NPS Director's Order 12, *Conservation Planning, Environmental Impact Analysis, and Decision-making* and the accompanying NPS *NEPA Handbook*. Compliance with section 106 of the National Historic Preservation Act of 1966, as amended, and with section 7 of the Endangered Species Act was conducted separately but concurrently with the NEPA process. The EA was also prepared in accordance with Director's Order 77-1: *Wetland Protection* and Director's Order 77-2: *Floodplain Management*. The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.

SELECTED ALTERNATIVE

Based on the analysis presented in the EA, NPS selected Alternative 2: Develop the Nonmotorized Boathouse Zone for implementation. Detailed description of the selected alternative can be found on pages 11–19 of the EA. The selected alternative will allow phased development of nonmotorized boating facilities for both rowing programs and recreational paddlers at five sites within the nonmotorized boathouse zone while providing planning flexibility in future size, placement, and design of these

facilities. The selected alternative will add up to 42,000 square feet (SF) of facilities for rowing program support and user amenities, including self-serve lockers for car-top drop offs; rental kayaks; soft entry and dock entry kayak launching; public restrooms; picnic areas; a trail/boardwalk; a separated multiuse trail on Water Street NW; seasonal outdoor boat storage; and public plazas, decks, and aprons. The selected alternative will also improve the shoreline by removing riprap, debris, and near-shore sediments and creating a natural shoreline profile in the C&O Canal NHP portion of the zone. Minor shoreline fill and limited bulkhead construction and piles to accommodate boathouse construction will also occur in the Rock Creek Park portion of the zone, as will the possible excavation of the first floor of existing facilities at two sites by 2 to 3 feet below current grade to reduce the height above mean low water level and ramp length. Additionally, the NPS and DDOT will look to improve vehicular access in and through the zone by improving Water Street NW to two travel lanes with shared bike lanes, adding a 30-foot radius cul-de-sac, and providing between 26 and 36 on-street parking spaces; DDOT would be the agency responsible for implementing this action. The selected alternative also features a series of public plazas and aprons with designated loading zones. The existing public parking at the end of Water Street NW will be replaced with a kayak storage facility but will retain private parking and access for the three townhouses within the nonmotorized boathouse zone and the Potomac Boat Club. The selected alternative will also reconfigure public spaces in relationship to the proposed new facilities and the street; maintain and improve access to the townhouses, Potomac Boat Club, and Washington Canoe Club; and improve wayfinding for motorists, cyclists, and pedestrians. Lastly, the selected alternative will reconfigure the CCT to 10 feet wide and continue the trail on the south side of Water Street NW, connecting it to Georgetown Waterfront Park to improve cyclist and pedestrian safety and accessibility.

The design details of the improvements described above will be determined during the design phase. The development of any facility within the nonmotorized boathouse zone will be subject to local and federal laws and mandates and NPS policies regarding stewardship of natural resources, including Executive Order 11988, "Floodplain Management," Executive Order 11990, "Protection of Wetlands," Public Law 110-140, the Energy Independence and Security Act (EISA), Section 303 of the Clean Water Act "Chesapeake Bay Total Maximum Daily Load," Executive Order 13508, "Chesapeake Bay Protection and Restoration," Executive Order 13514, "Federal Leadership in Environmental, Energy and Economic Performance," and the 2006 *Federal Leadership in High-Performance and Sustainable Buildings Memorandum of Understanding* that includes United States Green Building Council Leadership in Energy and Environmental Design requirements.

RATIONALE FOR DECISION

The construction of an additional 42,000 SF of rowing program facilities will increase the capacity to fully support demand for nonmotorized recreation in the project area and reduce crowding at facilities along the Potomac River in Washington, DC, allowing more users to access the water during peak hours. New and improved amenities (i.e., lockers, storage facilities, public restrooms, picnic areas, and public plazas, trails, and boardwalks) will enhance the visitor experience, while new and improved docks and boat launches, public plazas, aprons, and loading zones will improve public access for nonmotorized boating and paddle sports. The proposed improvements to the current configuration of the CCT between the Alexandria Aqueduct and Georgetown Waterfront Park will improve the trail's functionality and strengthen its connection to Georgetown. In addition, the improvements to Water Street NW, including a cul-de-sac, up to 36 on-street parking spaces, and improved wayfinding and signage will provide safe and compatible access for pedestrians and cyclists with motorized vehicles to and through the zone. Lastly, the shoreline improvements will create a more natural, aesthetically pleasing shoreline profile. The shoreline improvements combined with the added facilities will result in an overall stronger visual identity and sense of destination with visible services and amenities, convenient access points, and a clear site relationship with the waterfront. Ultimately, this alternative best balances the competing interests of accessibility and vehicular, cyclist, and pedestrian safety with the demand for nonmotorized recreation while respecting the historic character, natural resources, and existing recreational use of the C&O NHP

and Rock Creek Park. This alternative also offers a phased approach to development and flexibility of design for the facilities and for the streetscape along Water Street NW, so the National Park Service will be able to provide facilities that integrate into the surroundings and serve the community and allow for problem solving to ensure a safe and functional transition along Water Street NW from the trail to the Georgetown Waterfront Park.

ALTERNATIVES CONSIDERED

The EA provides an overview of the proposed project and analyzes a no-action alternative (alternative 1 on page 11 of the EA) in addition to the selected alternative. Under the no-action alternative, no new facilities would be constructed in the nonmotorized boathouse zone, and capacity for nonmotorized boating on the Potomac River in Georgetown would remain the same, with rowers using Thompson Boat Center, Potomac Boat Club (private), or the Washington Canoe Club (private). The concession currently known as Key Bridge Boathouse would continue in its current location and configuration, providing public rentals of kayaks, canoes, and paddleboards. The site east of Key Bridge and the space immediately under the bridge would remain unimproved and would continue to serve as a storage yard for the city and for NPS facility maintenance operations. The CCT would still terminate at the Alexandria Aqueduct, and potentially dangerous conflicts would persist because of the abrupt trail termination and lack of wayfinding for cyclists, motorists, and pedestrians. Additionally, motorists unfamiliar with the area who use electronic mapping directions would continue to contribute confusion to the area because these directions assume that drivers are on the elevated road above, and wayfinding along Water Street NW would continue to be inadequate to provide direction to the wayward motorists.

MITIGATION MEASURES

The selected alternative incorporates the mitigation measures listed in appendix A of this document.

FINDING OF NO SIGNIFICANT IMPACT

As documented in the EA, the selected alternative has the potential for adverse impacts on water resources, historic resources, land use, transportation, and visitor use and experience; however, NPS has determined that the selected alternative can be implemented without significant adverse impacts, as defined in 40 CFR §1508.27.

Under the selected alternative, the addition of up to 26,100 SF of impervious surface for new facilities may adversely affect stormwater management and water quality. NPS will comply with the District of Columbia's sediment and erosion control measures during construction to avoid and minimize temporary water quality and stormwater impacts. Permanent impacts will be avoided and minimized by complying with section 438 of the EISA and the DC Stormwater Rule, which will reduce the load on the combined sewer system and indirectly benefit water quality. With the bulkhead improvements, including a new bulkhead that could be constructed to the US Army Corps of Engineers' bulkhead line, it is anticipated that no more than approximately 0.1 acre of fill in the river (adjacent to the zone in sites D and E) would be necessary. The extent of shallow riverine wetlands is limited in this area because the river becomes deep very quickly offshore of these sites, and fill would likely not need to extend to the bulkhead line. Impacts will be minimized by silt curtains, coffer dams, or other approved practices for in-water construction to minimize the amount of sedimentation that will enter the water column. Up to 7,750 SF of new dock space will also affect these riverine wetlands by shading habitat; however, impacts will be minimal because of the relatively small footprint of the new dock facilities in comparison to the area of the river. Direct impacts on the palustrine wetlands in the project area from fill will be limited to about 0.07 acre; indirect impacts from riparian vegetation removal to accommodate shoreline improvements will be minimized by techniques such as coffer dams to reduce soil movement and siltation on nearby wetlands. Compliance with NPS policy and US Army Corps of Engineers and local permit requirements will mitigate these adverse impacts on wetland resources. A Wetlands Statement of Findings is not

necessary because the area of disturbed wetlands will be small, and disturbance will be related to water-dependent improvements.

The entire project site is located within the 100-year floodplain. Under the selected alternatives, NPS will construct the new facilities on piles, elevated to 2 to 3 feet above the base flood elevation. These structures will be designed with flow-through construction and tear-away walls on the ground floor, so that flood waters can flow through the structures and not impede floodplain function. A Floodplain Statement of Findings is attached to this document as appendix B.

As outlined in the Assessment of Effect (September 2016), the implementation of the selected alternative will have no adverse effect on the Georgetown Historic District, Washington Canoe Club, Potomac Boat Club, C&O Canal Historic District, Alexandria Aqueduct, Key Bridge, GWMP Historic District, Rock Creek & Potomac Parkway Historic District, Theodore Roosevelt Island, Watergate, and John F. Kennedy Center for the Performing Arts, as determined in accordance with regulations implementing Section 106 of the National Historic Preservation Act appendix F. Under the selected alternative, rehabilitating the Washington Canoe Club will be completed in accordance to *The Secretary of the Interior's Standards for the Treatment of Historic Properties* will have beneficial impacts that include improving the overall condition of the property and preserving character-defining features of the historic building. Installing boat storage at the Alexandria Aqueduct will also be implemented according to the Secretary of the Interior's standards.

The construction of new facilities will alter the historic setting of resources along the Potomac River waterfront. The change to the setting is not expected to differ significantly from what it was historically, however, because this part of the shoreline housed boathouses along the waterfront. Although the selected alternative will directly affect the Georgetown Historic District by introducing up to five new non-contributing structures, the uses of these facilities are not inconsistent with historic function of the area and will be designed to be uniform in scale and character with the surrounding resources. Additionally, the introduction of modern buildings will not alter the characteristics that make the historic district eligible for listing as a National Historic Landmark and will not substantially diminish the integrity of the overall setting. The District of Columbia Historic Preservation Office, the Commission of Fine Arts, and the Georgetown Historic Preservation Review Board will review all new building designs to ensure their appropriateness within the Georgetown Historic District and direct effects on National Register listed or eligible properties. In addition, the selected alternative will be consistent with the recommendations provided in both the Comprehensive Plan for the National Capital and CapitalSpace's plan, which will result in beneficial impacts.

The selected alternative will attract new users to the nonmotorized boathouse zone, generating a large number of new vehicular, pedestrian, and bicycle trips to and within the project area during many months of the year. Implementation of a new multiuse trail extension, additional sidewalks, pedestrian priority areas, and plazas will have direct and beneficial impacts on the pedestrian network, while implementation of the multiuse trail extension and the potential inclusion of bicycle racks in the final design will have direct and beneficial impacts on the bicycle network. Increases in pedestrian and bicycle congestion will occur along the CCT and Water Street NW, but the design will address safety concerns related to congestion and multiple kinds of users, help accommodate increased congestion, and increase wayfinding and signage so there is less confusion in the zone. In terms of vehicular modes of transportation, direct, adverse impacts will result from increased traffic in the project area from increased vehicle demand and trips and associated operational failures at certain intersections (pages 72–74 of the EA). Direct, adverse impacts will also occur as a result of occasional congestion caused by large vehicles operating in a small space during regattas, although tour buses and other large vehicles (other than trash and service vehicles) will be routed elsewhere to park. However, mitigation measures will address traffic impacts, so these impacts will not be significant.

The selected alternative will noticeably enhance visitor use and experience by increasing public access to the river, increasing the capacity of the nonmotorized boathouse zone for more visitors, increasing the amount and diversity of visitor opportunities and facilities, and improving wayfinding. Visitors who want a more gradual transition from developed waterfront to parkland may perceive the added development as negatively affecting their experience, but these permanent, adverse impacts will not be significant because the facilities will not extend beyond the zone and will decrease in intensity as visitors move toward the western end of the zone. Temporary, adverse impacts will be limited to the period of construction from the potential closure of portions of the project area.

Informal consultation with the US Fish and Wildlife Service found no effect under section 7 of the Endangered Species Act on the northern long-eared bat (*Myotis septentrionalis*), a federally listed species (threatened) that could be present in the area and roosts in mature trees in summer months, because NPS will restrict when tree clearing will occur only from November through March. In addition, consultation with the National Marine Fisheries Service over two federally listed species of sturgeon and their distinct population subgroups that may be present in the Potomac River found that the action may affect, but is not likely to adversely affect the federally endangered shortnose sturgeon (*Acipenser brevirostrum*) or the five distinct population subgroups of the federally threatened Atlantic sturgeon (*Acipenser oxyrinchus*), namely the Chesapeake Bay, New York Bight, Carolina, and South Atlantic distinct population subgroups and the associated Gulf of Maine distinct population subgroup. Before beginning construction, we will consult and conference further on Section 7 shortnose sturgeon, Atlantic sturgeon, and critical habitat.

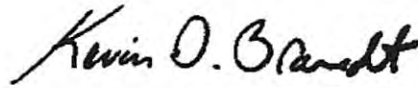
In summary, the selected action will not have a significant effect on the human environment. There are no significant impacts on public health, public safety, special-status species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the NPS selected action will not violate any federal, state, or local environmental protection law.

CONCLUSION

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA.

Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

Recommended:



Kevin D. Brandt
Chesapeake and Ohio National Historical Park
National Capital Region

1/18/17

Date

Recommended:

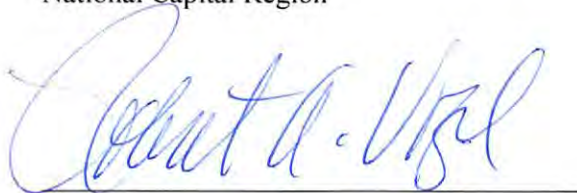


Frank Young
Rock Creek Park
National Capital Region

1/18/17

Date

Approved:



Robert A. Vogel
Regional Director
National Capital Region

2/13/17

Date

- Appendix A** Mitigation Measures
- Appendix B** Floodplain Statement of Findings
- Appendix C** Non-Impairment Determination
- Appendix D** Response to Public Comment
- Appendix E** Errata

APPENDIX A: MITIGATION MEASURES

The National Park Service (NPS) places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the following protective measures will be implemented as part of the action alternative. NPS will implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly implemented and are achieving their intended results.

WATER RESOURCES

Water Quality and Sediment and Erosion Control. Best management practices for erosion and sediment control (i.e., silt fencing and sediment traps) will be employed during and after construction, and stabilization and revegetation strategies will be employed after construction is complete. As each facility is constructed, NPS will prepare and implement an erosion and sediment control plan to conform to the standards and specifications of the District of Columbia's Stormwater Rule and Oil Erosion and Sediment Control Handbook, which lays out the standards and specifications for sediment and erosion control (DDOE 2013a; DDOH 2003). Exposed soils will be covered during construction with plastic sheeting, jute matting, erosion netting, straw, or other suitable cover material to prevent soil erosion and movement during rain or wind events. Erosion and sediment control best management practices will be monitored during construction to ensure they are functioning properly and will be left in place until all disturbed sites are revegetated and erosion potential has returned to pre-project conditions.

Stormwater management practices will be designed and installed on the sites to meet the District of Columbia's Stormwater Management requirements (DDOE 2013) and section 438 of the Energy Independence and Security Act.

Wetlands. Filling the riverine wetlands behind proposed bulkheads will require mitigation, either through the restoration of other wetlands; establishment of new wetlands; or enhancement of wetlands, streams, or other aquatic resources. These mitigation measures will augment other habitats after all appropriate and practicable efforts have been made to avoid and minimize wetland impacts. The actual extent of disturbance and the details of the mitigation measures will be determined at design.

Because the palustrine wetland is considered artificial and is not jurisdictional, the US Army Corps of Engineers may not require mitigation, although NPS may still require mitigation for any disturbance to this wetland.

Floodplains. Final site restoration will include the revegetation or other surface treatment of areas previously disturbed by construction activities. NPS staff-approved native plant seed mixtures and plant materials will be used for rehabilitating and revegetating disturbed areas.

CULTURAL RESOURCES

Impacts on historic structures or districts will be minimized by ensuring that development of the zone is conducted in a manner consistent with *The Secretary of the Interior's Standards for the Treatment of Historic Properties* (NPS 1995d). If archeological resources are discovered during construction, all work in the immediate vicinity of the discovery will be halted until the resources can be identified and documented and an appropriate mitigation strategy can be developed. Consultation with NPS and/or the NPS Regional Archeologist and State Historic Preservation Officer will be coordinated to ensure that the protection of the resources is addressed. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (25 United States Code 3001) of 1990 will be followed.

RARE, THREATENED, OR ENDANGERED SPECIES

To protect species of federally listed sturgeon that have been known to occur in the Potomac River, sediment curtains and coffer dams will be used to minimize adverse effects of increased sediment suspended in the water column. Sheetpiles for the bulkheads will be installed with vibratory drivers to ensure that noise levels avoid adverse effects on the sturgeon. No in-water activities will occur between February 15 and July 1 when the sturgeon spawn. NPS will reinitiate consultation with the National Marine Fisheries Service if new information reveals effects of the action that may affect listed species or critical habitat in a manner or to an extent not previously considered during the consultation, if the identified action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in this consultation, or if a new species is listed or critical habitat designated that may be affected by the identified action.

In addition, to protect the northern long-eared bat, tree removal for construction will be limited to the winter when bats hibernate and are not present.

TRANSPORTATION

To reduce impacts on the transportation system resulting from the action alternative, mitigation measures are recommended for each mode of transportation analyzed if they are warranted. Mitigation measures for the selected alternative with the options for sites C and D were used in the impact analysis and to identify potential mitigation actions because these options represent the most intense development scenario. This scenario was analyzed in detail in the Transportation Impact Assessment (TIA), included as appendix B of the environmental assessment EA). Specific transportation mitigation measures will be finalized during design and construction and may be carried out by the facility developers.

Traffic or vehicular mitigation is recommended at two intersections, and other minor improvements are recommended for pedestrians and bicycles. Details on the recommended mitigation measures are provided in the TIA (appendix B of the EA).

Pedestrians. Within the study area, but outside of Water Street NW, the future developer(s) of facilities should work with the District Department of Transportation (DDOT) to study locations noted in both the “Affected Environment” section of the EA and the TIA that do not meet the provisions of the Americans with Disability Act or DDOT standards for ways to make improvements for pedestrians, particularly those locations that lead to the nearest transit facilities.

Bicycles. No specific mitigation would be required. However, the future developer(s) of facilities in the zone should work with DDOT and with the appropriate entities to (1) implement the improvements noted in the Georgetown Transportation Study, (2) identify and fund improvements to alleviate the gaps and barriers noted in the “Affected Environment” section of the EA, and (3) continue to work on the moveDC bicycle recommendations outside of the project area, within the primary transportation study area and the 1-mile surrounding area.

Traffic. Recommended improvements to mitigate traffic impacts related to the implementation of the action alternative in the larger transportation study area include the following (more details on why these improvements are recommended are included in the TIA), although a transportation study following DDOT’s Comprehensive Transportation Review process will be required at the time of facility development:

- K Street NW and 31st Street NW (Intersection #5): Signalize this intersection.
- K Street NW and 30th Street NW (Intersection #7): Signalize this intersection.

VEGETATION

Trees and vegetation removed during construction activities will be replaced in the project area or nearby at a 1:1 diameter at breast height ratio. Details of how much or where vegetation will be replaced will be determined at design.

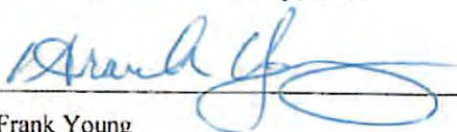
APPENDIX B: FLOODPLAIN STATEMENT OF FINDINGS

**STATEMENT OF FINDINGS
FOR
EXECUTIVE ORDER 11988 "FLOODPLAIN MANAGEMENT"
AND
EXECUTIVE ORDER 13690 "ESTABLISHING A FEDERAL FLOOD RISK
MANAGEMENT STANDARD AND A PROCESS FOR FURTHER
SOLICITING AND CONSIDERING STAKEHOLDER INPUT"
NONMOTORIZED BOATHOUSE ZONE**

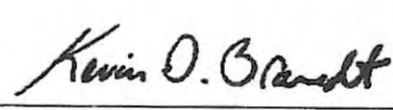
Chesapeake and Ohio Canal National Historical Park and Rock Creek Park
Washington, DC

July, 2016

RECOMMENDED:

 1/18/17
Frank Young Date
Superintendent, Rock Creek Park

RECOMMENDED:

 1/18/17
Kevin Brandt Date
Superintendent, Chesapeake and Ohio Canal National Historical Park

CERTIFICATION OF TECHNICAL ADEQUACY AND SERVICEWIDE CONSISTANCY:

 1/31/17
Acting Chief, Water Resources Division Date

APPROVED:

 2/13/17
Robert Vogel Date
Regional Director, National Capital Region

Introduction

Executive Order 11988 “Floodplain Management” and the newly issued Executive Order 13690 “Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input” require the National Park Service (NPS), as well as other Federal agencies, to evaluate the potential impacts of their actions to floodplains. The evaluation is intended to minimize the risk of flood damage to the park resources including capital investments, preserve and restore natural and beneficial floodplain values, and protect human safety, health and welfare. This Floodplain Statement of Findings (FSOF) has been prepared according to National Park Service Procedural Manual 77-2 to comply with Executive Order 11988 and Executive Order 13690.

The NPS is proposing to establish a nonmotorized boathouse zone (the zone) located along the District of Columbia side of the Potomac River in Georgetown. The purpose of this project is to establish a Potomac River recreation zone that more fully supports nonmotorized 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 C&O Canal NHP and Rock Creek Park.

The area proposed for the zone lies within NPS administered land in the Chesapeake & Ohio (C&O) Canal National Historical Park, and in Georgetown Waterfront Park, which is part of Rock Creek Park. Previous studies have demonstrated a steadily increasing demand for nonmotorized boating, including rowing, paddling, and standup paddle boarding within the region. The proposed action would establish a program for the zone that would help meet this demand and be designed appropriate to the constraints of the site.

Project Description

The NPS is proposing to establish a Potomac River recreation zone that more fully supports nonmotorized 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 C&O Canal NHP and Rock Creek Park.

Nonmotorized boating facilities are needed in Georgetown because public access points for nonmotorized boating and paddle sports are limited along the Georgetown waterfront, while the popularity of nonmotorized water sports (e.g., canoeing, kayaking, rowing, and paddle boarding) has been increasing; capacity at current boathouse facilities that provide access to the river and related amenities (boat storage, concessions, access facilities, boat rentals, beach, and docks) are insufficient; and the current configuration of the CCT and its connection to Georgetown does not provide safe and compatible access for pedestrians and cyclists as they move to and through the zone.

For discussion purposes, the zone has been divided into five Sites with Sites A–C west of the Alexandria Aqueduct in the C&O Canal NHP, and Sites D and E east of the Alexandria Aqueduct and the Potomac Boat Club, which sit on land administered by Rock Creek Park (See Figure 1, Page 5). The project focuses on the appropriate buildable area and flood resiliency design for each zone and how that area could be used to provide access to favorable flat water conditions for nonmotorized boating and improve on-shore amenities. It allows phased development of nonmotorized boating facilities for both rowing programs as well as recreational paddlers, while providing planning flexibility in future size, placement, and design of these facilities.



FIGURE 1. THE NONMOTORIZED BOATHOUSE ZONE

Overall, the implementation of this alternative would be phased, most likely starting with Sites D and E. Below is a summary of the proposed actions in Sites A-E, with more details provided in Figures 1 and 2.

Site A - Site A would include shoreline improvements, a sloped shoreline launch for canoes/kayaks/paddleboards, a picnic area that could include tables and grills or other amenities, and a trail/boardwalk through the Site. Based on future need, site development may include the option of constructing a small, single-story boat storage area with a footprint of no greater than approximately 2,700 square feet.

Site B - The Washington Canoe Club and its facilities are located within Site B. The only actions proposed on this Site would include general Site restoration, rehabilitation of the structure, reconfiguring or removing the fenced yard, altering the authorized access driveway so that it may service the facility, and providing controlled public access across the Washington Canoe Club apron to Site A.

Site C - Site C would provide a canoe/kayak rental/storage facility that could be one single structure or multiple smaller structures. The total facility footprint would be no greater than approximately 6,000 square feet with no more than two stories, and with a maximum height of 35 feet. The size of the adjoining public apron and dock would be commensurate with the ultimate size of the new facility or facilities, but not larger than 300 feet in length.

Site D - The primary configuration of the boathouse facility at Site D assumes that the privately owned townhouses would remain in private ownership and would include the construction of a smaller boathouse with an approximate footprint between 3,600 square feet and 4,200 square feet, a dock up to 150 feet long, a plaza, and ground-level boat storage. Both the dock and plaza areas would have public access except during permitted events, such as regattas and team practices. The proposed boathouse on this Site could be designed to have up to three stories or a maximum height of 45 feet. Should the townhouses become available for inclusion in the project at some point in the future, options for a larger boathouse (7,200 square feet) on that Site, with the public plaza shifted to the west, could be considered.

Site E - Site E would include construction of a large boathouse with a footprint of up to approximately 13,800 square feet, with a dock up to 300 feet in length, ground-level storage, and plaza areas. Both the dock and plaza areas would have public access except during permitted events, such as regattas and team practices. Treatments and configurations for Water Street, NW and links between the CCT, the street, and Georgetown Waterfront Park would include drop-off and temporary storage areas for car-top users to leave their boats while they park on Water Street, NW or in a parking garage. There would also be an apron with vehicular access from Water Street, NW at 34th Street, NW and public plaza/apron with dock access at west end of boathouse.

Reconfiguration of Roadways and Trail - The configuration of public spaces in relationship to the proposed new facilities and the street in Site D would maintain and improve access to the townhouses, Potomac Boat Club, and Washington Canoe Club. The end of Water Street, NW could feature a cul-de-sac constructed with a mountable curb, improved signage and other wayfinding, and use of different pavement surfaces through the transition between the Alexandria Aqueduct and the cul-de-sac. Wayfinding improvements for motorists, cyclists, and pedestrians could include a variety of signage at the cul-de-sac and on the CCT and changes in pavement texture and/or color where transitions occur or potential user conflicts could arise. Details would be determined at design.

Building Design Criteria - In compliance with Executive Order 11988, Floodplain Management (May 24, 1977), any new construction of structures or facilities approved to be located within the 100-year floodplain would require accepted flood-proofing and other flood protection measures to the facilities designed to be applied and would conform to the National Flood Insurance Program. E.O. 13690 amends

E.O. 11988 and establishes a Federal Flood Risk Management Standard (FFRMS) for all federally funded projects, to improve the Nation's resilience to current and future flood risks. E.O. 13690 and the FFRMS reinforce and expand upon the tenets and concepts of E.O. 11988 by calling on agencies to use a higher vertical flood elevation and corresponding floodplain than the base flood for federally funded projects. This higher elevation is a resiliency standard and was determined for this proposal by the Freeboard Value Approach (see page 9).

In addition, District of Columbia Municipal Regulation 21 stipulates that habitable spaces in buildings that are located in a floodplain must be located at least 1.5 feet above the minimum elevation of the 100-year floodplain. For this project, the proposed lower level boat storage would not be considered habitable.

Site Description

The entire boathouse zone extends 80 to 100 feet landward from the shoreline and includes approximately 1,500 feet of river frontage; it has a total approximate area of 2.9 acres. The CCT follows a 40-foot easement on the northern boundary of the zone that narrows to 30 feet near the Washington Canoe Club. Both Key Bridge and Whitehurst Freeway are elevated facilities that cross over the zone, with the Whitehurst Freeway being elevated over Water Street (Figure 1). The project area also includes Water Street between 34th Street NW and the Alexandria Aqueduct. General Floodplain Characteristics

Floodplain Description

Floodplains are defined by the NPS Floodplain Management Guideline as “the lowland and relatively flat areas adjoining inland and coastal waters, including flood-prone areas of offshore islands, and including, at a minimum, that area subject to temporary inundation by a regulatory flood.” The entire project area is within a 100-year floodplain, in which there is a 1% chance of flooding in a given year. The project area is in the Federal Emergency Management Agency’s Flood Hazard Zone AE with a 100-year flood elevation of +19.00 feet (DC OCTO 2015). The floodplain extends north toward the canal and stops at the canal levee, covering Water Street NW and the CCT (figure 3). The shoreline elevation varies from +8.00 feet at the western end to +15.00 feet on the eastern end of the zone (DC OCTO 2015; FIRM 2010). The highest tide of the year (the spring tide) is approximately +8.00 feet and lower areas at the western end of the zone are prone to periodic inundation.



FIGURE 3. THE FLOODPLAIN IN THE PROJECT AREA

Floodplain values include the ability of the floodplain to absorb increased water flows, recharge groundwater, and provide floodplain habitat. Floodplain values in the project area are limited, with both sites D and E either developed or fully paved. Site C has limited floodplain value, with some turfgrass and trees, with a driveway to the Washington Canoe Club and access to the combined sewer overflow outfall at the site. Site A would have the greatest intrinsic floodplain value, but is limited. Currently, obstructions in the floodplain occur, generally in the form of structures, such as Washington Canoe Club, the Alexandria Aqueduct, Potomac Boat Club, and the three townhouses. West of the Alexandria Aqueduct the land between the shore and the CCT includes mostly trees and low vegetation with no structures, so some capacity is available to accommodate flood waters, and some floodplain function exists in the form of habitat and recharge.

The Potomac River has experienced many severe floods, and this area has been subject to the effects of flooding in the past. Flooding was a major factor in why the canal was closed. The most recent severe flood occurred in 1996; minor floods occurred in 2003 and 2008.

Justification of Use of Floodplain

While the site sits entirely within the 100-year floodplain of the Potomac River, providing increased access to the water and increasing user amenities through the development of a Nonmotorized boathouse zone is dependent upon its proximity to the Potomac River and appropriate use of the floodplain.

Alternatives

The environmental assessment prepared this project only considered two alternatives, the proposed Nonmotorized Boathouse Zone (as described above) and the no action alternative.

Alternative 1 – No Action

Under the no-action alternative, no new facilities would be constructed in the nonmotorized boathouse zone, and capacity for nonmotorized boating on the Potomac River in Georgetown would remain the same with most rowers (i.e., university and high school students, individual rowers, and rowing groups) using Thompson's. Other rowers would continue to use the private Potomac Boat Club. Washington Canoe Club would remain in operation, serving paddlers who are members of the club, and negotiations concerning the use and renovation of the building in which the Washington Canoe Club is housed would continue. The concession currently known as Key Bridge Boathouse would continue in its current configuration, providing public rentals of kayaks, canoes, and paddleboards. The site east of Key Bridge and the space immediately under the bridge would remain unimproved and would continue to serve as a storage yard for the city (figure 2).

The CCT would still terminate at the Alexandria Aqueduct, and potentially dangerous conflicts because of the abrupt trail termination and lack of wayfinding for cyclists, motorists, and pedestrians would persist. Additionally, motorists unfamiliar with the area who use electronic mapping directions would continue to contribute confusion to the area because these directions assume that drivers are on the elevated road above. Although the C&O Canal NHP has installed a gate at the Alexandria Aqueduct, motorists still try to push through the gates, and wayfinding along Water Street NW is inadequate to provide direction to the wayward motorists.

Site Specific Flood Risk

The Preferred Alternative includes development that would be located in the 100-year floodplain (the floodplain that has a one 1 percent chance of being equaled or exceeded in any given year).

The entire project site is located within the 100-year floodplain. There would be up to approximately 30,300 SF of new structures within the zone under the proposal. Boathouse facilities are water-dependent, and therefore appropriate for placement in the floodplain. With the exception of the storage facility on site

A, the larger facilities would be built on slab and would not contain any habitable areas. These structures would all be constructed on piles and elevated to 2 to 3 feet above the base flood elevation (E.O. 13690). If the smaller facilities were placed on site C, these facilities would be placed on slab. Boat storage would be available on the ground floor below the habitable areas of the structures. These structures would be designed so the ground floor areas have flow-through construction and tear-away walls, so that the flood waters could flow through the structures and not impede floodplain function. Because of the conceptual nature of the plan for the zone at this time, a more specific study will be completed at the time of design for each boathouse. However, a 2004 study examined the effect of a large boathouse structure proposed at the time at the western end of the zone on the C&O Canal and the floodplain. The study concluded that the proposed structure would have no impact on the floodplain and would not increase the water surface level, velocity, or shear stress appreciably during floods (Patton, Harris, Rust and Associates 2004).

Mitigation

The preferred alternative is not expected to significantly alter the natural and beneficial functions of the floodplain.

Compliance with Development Requirements

Communities that participate in the National Flood Insurance Program, such as Washington, DC, are required to enforce floodplain management regulations that meet the requirements of the National Flood Insurance Program. Furthermore, in order to comply with Executive Order 11988 & 13690, Federal Agencies must demonstrate there are no reasonable alternatives outside of the floodplain and study ways to reduce the flood risk associated with the proposed action. Therefore, guidelines for regulated development in the 100- year floodplain so that there are minimal impacts to the floodplain, and adherence to general building and development requirements as outlined in the National Flood Insurance Program requirements will be followed.

Development in the floodway is also an issue to consider for compliance purposes. Development is generally not permitted in the floodway, and fill is prohibited in the floodway. The floodplain consists of two types of flood areas: the floodway and the flood fringe. The floodway is the area that encompasses the stream channel and is where floodwaters generally flow the fastest. By definition it is the area where fill cannot be placed without resulting in a cumulative one foot rise in the 100-year floodwater elevation. The flood fringe comprises the remainder of the floodplain that extends beyond the floodway area. According to the detailed hydraulic study for Washington, DC, the Potomac River does not have a designated floodway (FEMA, 1985), however, given the location of the proposed development, it is safe to assume it is located in the flood fringe, well away from the floodway. Therefore, the preferred alternative meets compliance requirements for floodway development. The proposed actions under the preferred alternative will be able to comply with these requirements.

Conclusions

The proposed action would include activities located within the regulatory 100-year floodplain of the Potomac River. Additionally, as a federally funded project, the additional FFRMS applies to the proposed project. The proposed development within the proposed Nonmotorized boat zone would create additional obstructions within the floodplain; however, the obstructions would not noticeably impact the water surface level during a flood event. A slight decrease in the capacity of the floodplain to store floodwaters would occur, as well as a slight decrease in infiltration. However, due to the limited capacity of the floodplain in its current condition, these alterations would not result in a measureable adverse impact. Based on the relative magnitude of the Potomac River, the proposed actions would not have appreciable effects which would increase the risk of flooding or hazards to human life or property.

Floodplain values would be only slightly affected on Site A with the possible placement of an up to 2,700 SF storage facility on the site; or not affected at all with the placement of only a trail or boardwalk were

constructed. It is conceivable that the floodable designs of the future boathouse structures and the use of permeable pavers on the public plazas on sites C, D, and E could minimize impacts and slightly increase the ability of the site to capture increased flows, although development in the zone would not improve wildlife habitat. Placement of smaller structures on site C would also affect floodplain function and values less than if a larger facility were placed there, and the structures would be designed to allow floodwaters to flow through them or to be removable if a flood is imminent, minimizing adverse effects on floodplain functions and values at that site. In addition, the proposed pedestrian/bicycle connection would have no noticeable effect on natural or beneficial floodplain functions. There would be no increase risk to human safety as a result of this proposal. The proposed boathouse structures would not be permanently inhabited, and the area would be evacuated should it be known that flooding is to occur. The project would not increase the risk associated with flooding for the 100-year event. Therefore, the National Park Service has determined the proposed actions would be consistent with Executive Order 11988 and 13690.

APPENDIX C: NON-IMPAIRMENT DETERMINATION

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the US Department of the Interior and NPS to manage units “to conserve the scenery and the natural and historic objects and wild life therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (54 United States Code [USC] § 100101). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that NPS must conduct its actions in a manner that will ensure no “derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress” (54 USC 100101).

NPS Management Policies 2006, section 1.4.4, explains the prohibition on impairment of park resources and values.

“While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the Nation Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.”

NPS has discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of a park (*NPS Management Policies 2006*, section 1.4.3). However, NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values (section 1.4.3). An action constitutes an impairment when its impacts “harm the integrity of Park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values” (section 1.4.5). To determine impairment, NPS must evaluate “the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts” (section 1.4.5).

This determination on impairment has been prepared for the selected alternative described in this Finding of No Significant Impact. An impairment determination is made for the resource topics of water resources (including water quality, wetlands, and floodplains) and historic districts and structures. These resources are considered fundamental to the park because of the ecological importance of the Potomac Gorge (upstream of the boathouse zone) and the historical significance of the Chesapeake & Ohio (C&O) Canal. Similarly, the purpose of the Georgetown Waterfront Park, administered by Rock Creek is to provide (1) a connection to the river, (2) viewing for rowing events, and (3) additional access to the river for rowing and other nonmotorized boating activities. An impairment determination is not made for visitor use and experience and public health and safety because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act and cannot be impaired in the same way that an action can impair park resources and values.

WATER RESOURCES

The selected action will affect water resources, including water quality, wetlands, and floodplains; however, these resources will not be impaired. Compliance with the District of Columbia’s stormwater rule and section 438 of the Energy Independence and Security Act, and the use of green infrastructure will likely improve stormwater management in the area, which will in turn benefit water quality and floodplains. Impacts on the palustrine wetland from water-dependent proposed

actions at site A will be very limited. NPS will site the structure and trails to avoid wetlands to the extent possible; at worst, only about 1,900 square feet (SF) will need to be filled or disturbed for the boat storage facility on site A and another 1,280 SF for a boardwalk trail over the wetlands (0.07 acre overall, not all of which will be permanent disturbance; the boardwalk over the wetlands will not exceed 160 feet in length). Based on property boundary information, under the worst case scenario, an area of up to 0.28 acre may be filled in the river next to sites D and E. However, based on GIS calculations of the area of submerged lands between the shore and the approximate legal bulkhead line, it is anticipated that no more than approximately 0.1 acre will be necessary, mostly at site E, if fill is required at all. In addition, the river becomes deeper than 2 meters rapidly offshore from sites D and E, shallow open-water wetland impacts will be minimal, and construction management practices such as the use of cofferdams and sediment curtains will minimize risk of short-term, adverse impacts from sedimentation. Because the impacts on wetlands and water quality will be very limited, and floodplain function and values will not be disrupted and may be improved in the long term, no impairment of these water resources will occur.

HISTORIC STRUCTURES AND DISTRICTS

The project area encompasses properties listed on National Register of Historic Places (national register) including the Georgetown Historic District, the C&O Canal Historic District, and a historic bridge abutment from the Potomac (Alexandria) Aqueduct. The selected alternative will have direct and indirect impacts on historic resources within the direct and indirect areas of potential effect. However, none of the impacts will alter the eligibility for listing of any of the historic resources in the national register. The new facilities will alter the setting of the historic resources in the area, but will be designed to be compatible with the adjacent resources and consistent with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. The Washington Canoe Club structure, also listed on the national register, will be rehabilitated in accordance with the Secretary of the Interior's standards to ensure that impacts to the historic structure are beneficial to its preservation. Through consultation with the District of Columbia and Virginia State Historic Preservation Offices and other consulting parties, it has been determined that development of the new facilities will not result in an adverse effect on historic resources. Based on this, no impairment of historic structures and districts will occur.

APPENDIX D: RESPONSE TO PUBLIC COMMENT
GEORGETOWN NONMOTORIZED BOATHOUSE ZONE DEVELOPMENT PLAN

Responses to Substantive Comments

December 2016

AE20000 Affected Environment: Land Use (Substantive)

Concern: A commenter questioned whether avoiding zoning regulations should be an aim of the plan.

Response: Discussion of zoning applicability in the nonmotorized boathouse describes the factual situation, and does not express aims or aspirations. The National Park Service (NPS) would follow zoning regulations to the extent practicable.

Correspondence Id: 34 **Comment Id:** 537738

Comment Text: We also question whether avoiding DC zoning regulations should be an aim of a NPS public project such described in this EA.

Organization: Friends of Georgetown Waterfront Park

Commenter: Robert vom Eigen **Page:** **Paragraph:**

Concern: A commenter asked if sites D and E would be developed to their full potential.

Response: The environmental assessment (EA) analyzes the full buildout potential at all sites to adequately capture potential impacts. Sites D and E are expected to be the most intensely developed sites in the zone, given their location in the more urbanized end of the zone outside of the C&O Canal National Historical Park (NHP). Full development of site D would depend on the disposition of the privately owned townhouses.

Correspondence Id: 38 **Comment Id:** 537637

Comment Text: However, for the reasons advanced in my comments and recommendations submitted to NPS on 2/15/15, which I incorporate and make a part of this submission, the treatment proposed in the EA by NPS for Sites D and E fails to meet the full development potential of those sites.

Organization:

Commenter: Robert B Norris **Page:** **Paragraph:**

Concern: Commenters questioned why improvements are proposed to site A, and requested more information about the proposed programming on that site.

Response: The purpose of the Georgetown Nonmotorized Boathouse Zone Development Plan (the plan) is to establish a Potomac River recreation zone that more fully supports nonmotorized recreation and increases the public's access to the river, among other things. Site A has always been considered part of

this zone. Programming for this site would be less intense than at sites C, D, or E, and would likely include launch for paddlecraft and a small storage facility or a rental facility. Placement of tables and benches at the site is intended to allow for places for paddlers who launch in the area to sit before and after being on the water. References to grilling have been deleted in the errata to the EA.

Correspondence Id: 41 **Comment Id:** 537706

Comment Text: 3) No justification is offered for the proposed storage structure in area A. Would it hold only kayaks and other small craft launched there? Would there be some kind of onsite management or rental kiosk? Why is it necessary?

Organization:

Commenter: Carrie Johnson **Page:** **Paragraph:**

Correspondence Id: 57 **Comment Id:** 537650

Comment Text: Regarding the public plazas as described in the EA, I do wonder why the EA calls for picnicking and grill areas (page 80) in the NMBZ when NPS does not allow grilling anywhere else in the Georgetown Waterfront Park or at Thompson's.

Organization:

Commenter: Anthony Johnson **Page:** **Paragraph:**

Kept Private: No

Commenter: N/A N/A **Page:** **Paragraph:**

Correspondence Id: 23 **Comment Id:** 537608

Comment Text: First off, Site A is more remote and cut off from easy public access, making it a better site for a dedicated, institutional user rather than to provide public shoreline access. In addition, using Site A for public access will result in increased traffic and congestion on the bike path - as well as increased risk for accidents associated with the conflict of motorized and other traffic where the bike path connects to the roadway for river access and runners, bicyclists and pedestrians. This is a concern that 1) we know is shared by many of those who already utilize this area and 2) needs to be addressed in a collaborative fashion as this process moves forward. With that said, we are encouraged that the 2016 Plan allows for the construction of rowing boathouses on Sites D and E (but regret that the 2016 Plan has been limited to a very narrowly delineated geographic area).

Organization: Georgetown University

Commenter: N/A N/A **Page:** **Paragraph:**

AE22000 Affected Environment: Visitor Use (Substantive)

Concern: Commenters expressed concern about trash, inadequate restrooms, and public safety in the area along Water Street; they also requested that lighting be provided under the Whitehurst Freeway.

Response: Improvements to the zone would result in improvements to the streetscape and create a safer, more desirable environment along Water Street. Lighting under the Whitehurst Freeway could be a component of improvements to the streetscape in the future but is not part of the scope of this plan. The proposed facilities would include restrooms for facility users. Facility managers would be responsible for trash management for their sites within the zone. Trash management within Georgetown Waterfront Park is not within the scope of this project.

Correspondence Id: 10 **Comment Id:** 537734

Comment Text: Trash cans are often full and overflowing. Rats are a major problem. For several years, this area was the scene of drug buys and a lot of pickpocketing. This still goes on, but in a reduced manner. We don't want to see it start up again.

Organization:

Commenter: N/A N/A **Page:** **Paragraph:**

Correspondence Id: 22 **Comment Id:** 537603

Comment Text: Hundreds of people attempt to go on the river every weekend during warm weather, resulting in continuously overflowing trash bins and overtaxed port-a-potties to name a few issues. The area is often left littered with trash. These generally unsanitary conditions will only increase over time.

Organization: 3528 K. Street

Commenter: Stephen T Miller **Page:** **Paragraph:**

Correspondence Id: 10 **Comment Id:** 537480

Comment Text: Will the NPS improve lighting under the Whitehurst Freeway, especially as Water Street ends past 34th Street? Will the NPS install real-time security cameras along the way? Will the NPS and/or Georgetown BID provide the kind of public clean-up needed to keep this area free of litter, food refuse, etc.?

Organization:

Commenter: N/A N/A **Page:** **Paragraph:**

Concern: Commenters expressed concern that stormwater management was not included in the EA analysis, and that the additional impervious surfaces and new structures and inadequately planned stormwater management could contribute to issues with flooding. Commenters also expressed concerns about wetland and wildlife disturbance.

Response: Stormwater management is not addressed as a separate impact topic, but the effects of stormwater management requirements are considered in the water resources section of the EA. The EA

clearly describes stormwater requirements and indicates that new facilities would be required to replicate predevelopment hydrology on the sites. It is likely that stormwater management on sites D and E would result in improved stormwater management systems on those sites, which are now paved without stormwater management at all. As noted in chapter 1, wildlife disturbance would be minimal. Minimal disturbance to wetlands are described in the action alternative, alternative 2.

Correspondence Id: 51 **Comment Id:** 537672

Comment Text: Affected Environment/Water Resources (page 27): Given the environmentally sensitive location of the project along the Potomac River, stormwater management should be included under Water Resources as a separate potential impact under Affected Environment and Environmental Consequences.

Organization: NCPC

Commenter: Diane Sullivan **Page:** **Paragraph:**

Correspondence Id: 22 **Comment Id:** 537600

Comment Text: First, we are concerned about additional flooding issues given impermeable surface disturbance. The area is already prone to flooding, as noted in the report, and we regularly experience trouble with flooding in the property. We are concerned that the additional impermeable surfaces and potential destruction of vegetation that aids water absorption would contribute to additional flooding in the area.

Organization: 3528 K. Street

Commenter: Stephen T Miller **Page:** **Paragraph:**

Correspondence Id: 22 **Comment Id:** 537605

Comment Text: Fourth, as good stewards of the beautiful Potomac River, we would like to acknowledge our concern about wildlife & wetland disturbance. We have owned this property for over many decades, and have watched the river's health increase over the years as a number of environmental laws have been enacted.

Organization: 3528 K. Street

Commenter: Stephen T Miller **Page:** **Paragraph:**

AE26000 Biological Resources (Substantive)

Correspondence Id: 55 **Comment Id:** 537654

Comment Text: The concerns are: (1) Minimizing shoreline impact, preserving the natural environment;

Organization: D.C. Chapter of the Surfrider Foundation

Commenter: N/A N/A **Page:** **Paragraph:**

Concern: A commenter was concerned that vegetation had been dismissed as an impact topic and noted that local regulations and policies require revegetation to prevent a net tree loss from the area. The commenter also suggested that revegetation plans include pollinator-friendly plants in accordance with the 2014 Presidential Memorandum, "Creating a Federal Strategy To Promote the Health of Honey Bees and Other Pollinators."

Response: The EA describes the likely impacts on vegetation in the dismissal section in chapter 1. This topic is dismissed from further analysis in the EA because of the condition of the existing vegetation, the ability to add landscaping (i.e., ground cover and shrubs) to remaining open areas, and the emphasis on site landscaping and tree replacement. This section also describes how vegetation would be replaced and that replacement vegetation would be native and planted appropriately according to its habitat per NPS policy. See errata sheet for clarification.

Correspondence Id: 51 **Comment Id:** 537673

Comment Text: Vegetation and Fish and Wildlife should not be dismissed from further analysis. Given the sensitive nature of the site, vegetation removal along the shoreline and proposed docks requiring fill in the waterbody, we recommend considering the cumulative impacts and environmental changes on wildlife and riverine habitats that would result from implementing the alternatives and minimize its negative impacts.

Organization: NCPC

Commenter: Diane Sullivan **Page:** **Paragraph:**

Correspondence Id: 51 **Comment Id:** 537677

Comment Text: ¶ Integrate pollinator friendly species into the landscape palette consistent with the June 20, 2014 Presidential Memorandum - ("Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators").

Organization: NCPC

Commenter: Diane Sullivan **Page:** **Paragraph:**

Correspondence Id: 51 **Comment Id:** 537676

Comment Text: The Federal Environment includes policies related to tree canopy and vegetation. These policies state that when tree removal is necessary, trees should be replaced to prevent a net tree loss to the project area, and according to the regulations of the local jurisdiction.

Organization: NCPC

Commenter: Diane Sullivan **Page:** **Paragraph:**

AE8000 Affected Environment: Visual Quality (Substantive)

Concern: Commenters recommended that development west of the Alexandria Aqueduct be minimized to preserve the Potomac Palisades, ensure that the transition from urban to natural character remains gradual, and preserve the natural, historic, and scenic resources of the C&O Canal NHP.

Response: The zone includes sites west of the Alexandria Aqueduct in the C&O Canal NHP that were identified in the original planning document for Georgetown Waterfront Park. This area of shoreline has historically been home to recreational boathouses and would support less intense development than at sites D and E. Sensitive design and review would minimize changes to the natural, historic, and scenic resources on these sites.

Correspondence Id: 51 **Comment Id:** 537665

Comment Text: West of the aqueduct, the rural character includes open views to the river, significant vegetation, the Washington Canoe Club as the only structure, and the C & O Canal levee. Given the strong identity of the area. We recommend retaining the Potomac Palisades in their natural state. This can be accommodated by minimizing development to the west of the aqueduct (Sites A-C) and ensuring that the transition from natural to urban character remains gradual to the east of the aqueduct (Sites C and D).

Organization: NCPC

Commenter: Diane Sullivan **Page:** **Paragraph:**

Correspondence Id: 39 **Comment Id:** 537743

Comment Text: 5. Support for preserving the natural, historic, and scenic resources of the C&O Canal NHPark (at Sites A, B, C) as the development plan moves forward.

Organization:

Commenter: Sally Strain **Page:** **Paragraph:**

AL1200 Alternative 1 - High Density (Substantive)

Concern: A commenter indicated that the District of Columbia Water and Sewer Authority (DC Water) needs to be able to access its infrastructure on site C (CSO 028). Also, DC Water's Clean Rivers Project may still result in to construction of a stormwater storage tunnel and supporting infrastructure underneath the C&O Canal NHP in the nonmotorized boathouse zone if green infrastructure in the sewershed proves impracticable. The commenter also noted that design and construction guidelines are available for doing work in the vicinity of DC Water infrastructure.

Response: Facilities on site C would be designed to accommodate access to the DC Water infrastructure on the site. The tunnel, should it be built, would be subject to environmental impact analysis and would need to consider NPS facilities in the area. See errata for page 13 concerning location of the proposed tunnel and clarifying that access to infrastructure would be accommodated on site C.

Correspondence Id: 36 **Comment Id:** 537716

Comment Text: The NMBZ EA incorrectly states that the Potomac River Tunnel is planned to stop outside the NMBZ Project Area. Should GI in the Potomac River sewershed prove impracticable, DC Water is required by Federal Consent Decree to construct a tunnel and supporting infrastructure for control of the CSOs in the vicinity of the NMBZ Project Area.

Organization: DC Clean Rivers Project

Commenter: Brandon Flora **Page:** **Paragraph:**

Correspondence Id: 36 **Comment Id:** 537709

Comment Text: 1. NMBZ EA Should Address Protection of Existing Water and Sewer Infrastructure DC Water currently maintains critical infrastructure in the proposed NMBZ Project Area. 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.

Organization: DC Clean Rivers Project

Commenter: Brandon Flora **Page:** **Paragraph:**

Correspondence Id: 36 **Comment Id:** 537710

Comment Text: The NMBZ EA does not appear to consider how DC Water will access these facilities for regular and emergency maintenance, repair, and improvement.

Organization: DC Clean Rivers Project

Commenter: Brandon Flora **Page:** **Paragraph:**

Correspondence Id: 36 **Comment Id:** 537711

Comment Text: Additional information regarding construction in the immediate vicinity of existing DC Water facilities is available in DC Water's Project Design Manual, available at <https://www.dewater.com/business/permits/criteria.cfm>.

Organization: DC Clean Rivers Project

Commenter: Brandon Flora **Page:** **Paragraph:**

Correspondence Id: 36 **Comment Id:** 537713

Comment Text: NMBZ EA Should Address the Need for DC Clean Rivers Project Facilities within the NMBZ Project Area Should Green Infrastructure be Determined Impracticable DC Water is in the process of implementing its Combined Sewer System Long Term Control Plan (LTCP), also known as the DC Clean Rivers Project.

Organization: DC Clean Rivers Project

Commenter: Brandon Flora **Page:** **Paragraph:**

Correspondence Id: 36 **Comment Id:** 537714

Comment Text: The Consent Decree was modified in January 2016 to provide for implementation of Sewer Separation and Green Infrastructure (GI) for CSO control in certain portions of the Rock Creek and Potomac River sewersheds.

Organization: DC Clean Rivers Project

Commenter: Brandon Flora **Page:** **Paragraph:**

AL4000 Alternatives: New Alternatives Or Elements (Substantive)

Concern: Commenters asked that the townhouses that are part of site D be incorporated into the plan, and one commenter encouraged NPS to work with the DC Office of Planning and local stakeholders to develop a small area plan that incorporates the townhouses into the future boathouse site. Such a plan, once adopted, would enable the District government to assist with the development of these sites to maximize the public good envisioned in the Development Plan and EA.

Response: The lots containing the townhouses are currently private property and, as such, cannot be considered as the primary focus of this plan. However, the EA does contain an option for the site should these townhouses become available to NPS for inclusion in the plan.

Correspondence Id: 47 **Comment Id:** 537691

Comment Text: 3. With respect to Site D, we urge the NPS to work with the District government and Georgetown stakeholders to develop a small area plan for the area that incorporates the privately owned townhouses into a future boathouse site. Such a plan, once adopted, would enable the District government to assist with the development of these sites to maximize the public good envisioned in the Development Plan and EA.

Organization: Georgetown Business Improvement District

Commenter: Will Handsfield **Page:** **Paragraph:**

Organization:

Commenter: Anthony Johnson **Page:** **Paragraph:**

Correspondence Id: 23 **Comment Id:** 537612

Comment Text: In light of the fact that the two privately owned townhouses immediately adjacent to Site D are owned by The George Washington University, which is very much a part of the planning process covered by the 2016 Plan, we encourage the NPS, in consultation with The George Washington University, to adjust the configuration of site D to reflect their inclusion.

Organization: Georgetown University

Commenter: N/A N/A **Page:** **Paragraph:**

Concern: Commenters discussed the Georgetown Business Improvement's (BID's) proposal for new alignments along Water Street. Commenters expressed support for the alignment of the separated bike lane in the plan, but they also expressed support for the location of the traffic circle at 34th Street NW in the BID proposal, rather than farther west in the zone. One commenter wanted the bike lane to cross to the south side only after it was east of site D.

Response: The location for the turnaround is conceptual and was developed in coordination with the District Department of Transportation (DDOT), which is a cooperating agency. The design in this plan, the BID's design, or a blend of the two may be carried forward, and the design would be refined to minimize safety issues. DDOT would be responsible for the reconfiguration of the street in coordination with NPS. The bike lane was placed on the north side of the street as it crosses in front of Potomac Boat Club and the townhouses because these properties have privately owned parking spaces that pose a potential safety conflict to cyclists exiting the trail onto Water Street. Clarifications have been added to the errata sheet that the plan is conceptual and emphasizing that DDOT is a cooperating agency.

Correspondence Id: 20 **Comment Id:** 537586

Comment Text: With respect to the Action Alternative, PBC supports creating a separated bike lane on the north (Canal) side of Water Street and advocates that this bike lane remain on the north side until it passes the present site of Key Bridge Boats.

Organization: Potomac Boat Club

Commenter: Chad Jungbluth **Page:** **Paragraph:**

Correspondence Id: 14 **Comment Id:** 537512

Comment Text: Furthermore, the District Department of Transportation (DDOT), which owns and manages the K Street/Water, worked closely with Georgetown Business Improvement District (G-BID) to develop a comprehensive multi-modal traffic and transportation plan for the corridor between the Aqueduct and Rock Creek Parkway. We understand that DDOT now fully endorses that plan and is planning to implement it as funds become available. Under that plan, access west of 34th Street would be

strictly limited, making it even more difficult for car top boaters to access the NPS-proposed launch and storage facilities.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Concern: A commenter noted that there should be a buffer between the Washington Canoe Club and any new facilities. Other comments about the Washington Canoe Club included concerns about public access across the apron and requiring the primary access to site A on the north side of the club.

Response: The Washington Canoe Club exists on land owned by the federal government within the C&O Canal NHP and is considered its own site. Access across the apron would be restricted, similar to access across the aprons at sites D and E. Facilities on all sites would have similar setbacks from other facilities. The facility at site A would be placed where it is to ensure that disturbance to the palustrine wetlands would be avoided and minimized to the extent possible, but it would be set back from the Washington Canoe Club building itself.

Correspondence Id: 14 **Comment Id:** 537505

Comment Text: We strongly believe that NPS should provide a buffer between WCC and any new facilities.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Correspondence Id: 14 **Comment Id:** 537500

Comment Text: If, or when, NPS develops public boat launch, boat storage, and/or picnic facilities at Site A upstream of WCC, NPS should provide access to that site behind WCC, along the Capital Crescent Trail.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

AL7100 Concerns about Kayak and Canoe Access comments about cartop access for paddlecraft in the zone. (Substantive)

Concern: Commenters expressed concerns about allowing launching points and other access for paddlers and kayakers because they would add to congestion in the area, make drop-off of personal craft and parking logistically challenging, and could create safety concerns related to interactions with users of the CCT. Commenters suggested alternatives for access in the area, both inside and outside the zone, including at Thompson Boat Center (Thompson's), which has parking or at other sites along the Potomac down stream of Thompson's.

Response: The purpose of the plan is to increase access to the river for the public, including forms of nonmotorized recreational access other than rowing. Paddlers requested access in the zone because soft launches on this part of the river are rare. Conflicts with users of the trail have been minimized to the extent possible. Refinements in design during implementation would further minimize conflicts. Access points elsewhere in the area may be considered in the future but were not considered here because this plan is focused on facilities in the proposed zone. Refinements to programming at Thompson's would also be considered in the future.

Correspondence Id: 34 **Comment Id:** 537630

Comment Text: Providing space for paddlers, canoeists, and kayakers in the western part of the waterfront only contributes to further congestion in already congested area.

Organization: Friends of Georgetown Waterfront Park

Commenter: Robert vom Eigen **Page:** **Paragraph:**

Correspondence Id: 39 **Comment Id:** 537746

Comment Text: 8. Instead of building in the C& O Canal NHPark, consider more accessible areas outside the NMBZ (such as Thompson's, the GTown Waterfront Park land at 34th St., and others) for public access to the river for small paddle crafts,

Organization:

Commenter: Sally Strain **Page:** **Paragraph:**

Correspondence Id: 57 **Comment Id:** 537646

Comment Text: A model for a very simple kayak rental facility is the one run on of the District dock in the Anacostia behind National's Park. There is no permanent building, and there is ample street parking. That same program could easily be implemented anywhere on Haines Point, or in West Potomac Park near Memorial Bridge or in Little River behind Roosevelt Island. All of those sites already have parking close to the river. All that would be necessary is a dock.

Correspondence Id: 34 **Comment Id:** 538281

Comment Text: NPS's proposed use for Site A is to invite people who will launch their canoes, kayaks and paddle boards upstream leaving their automobiles and trucks at the end of the Water Street just east of Site C. There is no parking for those vehicles. Thompson's Boat Center (TBC) is a better option for canoes, kayaks and paddle boards. NPS must recognize that if the two universities are permitted to build and relocate boathouses within the NMBZ that would leave nearly three quarters of TBC available for high school rowing teams and the general public with sculls, paddle boards, kayaks and canoes. A parking lot is adjacent to TBC; Metro stations and bus stops on K Street are within walking distance of TBC.

Organization: Friends of Georgetown Waterfront Park

Commenter: Robert vom Eigen **Page:** **Paragraph:**

Correspondence Id: 20 **Comment Id:** 537587

Comment Text: With respect to the Action Alternative, PBC does not support locating a drop-off point for car topped boats and storage lockers in the immediate vicinity of the Alexandria Aqueduct Bridge arch where the Capital Crescent Trail merges with Water Street. Such features would increase congestion and conflict among various users of the river, trail, and roadway, and create a safety hazard.

Organization: Potomac Boat Club

Commenter: Chad Jungbluth **Page:** **Paragraph:**

Correspondence Id: 23 **Comment Id:** 537609

Comment Text: In contrast, the recommendation in the 2016 Plan that Site A be utilized for a facility to serve as a public shoreline launch for canoes/kayaks/paddleboards poses clear challenges relating to access to such a facility from the street.

Organization: Georgetown University

Commenter: N/A N/A **Page:** **Paragraph:**

Correspondence Id: 57 **Comment Id:** 537647

Comment Text: I am in favor of more access to the river for paddlers and rowers but I do not feel that all needs have to be met in the Georgetown section of the Potomac. For all of the above reasons I am opposed to providing launching sites for car top carried boats in the NMBZ.

Organization:

Commenter: Anthony Johnson **Page:** **Paragraph:**

Correspondence Id: 47 **Comment Id:** 537690

Comment Text: With respect to site A, we support its development, however, we strongly believe that the recommended use for paddleboard, canoes and kayaks could present significant practical management problems and conflicts with the other approved uses for this area. Requiring carrying, dragging, or wheeling vessels from at least the eastern side of the aqueduct bridge nearly 1/5th of a mile to site A, with significant conflicts with Capital Crescent Trail users or the WCC, and no guarantee of available parking in the immediate area around the aqueduct bridge, makes little sense to us. We strongly recommend that the NPS show flexibility in the next phase of planning and allow for a less conflict-prone use of site A, such as a university boathouse as suggested by Georgetown University and other key stakeholders in this area.

Organization: Georgetown Business Improvement District

Commenter: Will Handsfield **Page:** **Paragraph:**

Correspondence Id: 47 **Comment Id:** 537693

Comment Text: As discussed above with respect to Site A, we share a concern with other members of the community about the decision to accommodate car top access within the limits of the NMBZ defined in this study. This area is so congested - especially on the weekends - that it may be wiser to direct car traffic to other locations that are more accessible and have fewer conflicts. This area is severely parking constrained at the end of a 1/3rd mile long dead end. With no dedicated parking spaces to support car top kayaking we believe that creating facilities that require a long and inconvenient dance to get a boat to and from a launching site in the zone is ill-advised. We suggest that Key Bridge boats should be the primary provider of paddle boats and primary location for launching in this zone and that car top access should be directed to Thomson's boat center, Fletcher's Cove, and other possible sites such as Teddy Roosevelt Island and Hains Point, which have more flexibility and far greater capacity for handling passenger vehicles than the far west end of Water Street. Directing most car top access out of this area, it will enhance the experience for the boathouse and public area users who arrive on foot or by bike, pose less conflict with the rowing clubs and their users, and generate less congestion for residents and near-by businesses.

Organization: Georgetown Business Improvement District

Commenter: Will Handsfield **Page:** **Paragraph:**

AL8000 Parking Comments about parking in the Zone (Substantive)

Concern: There were several comments about proposed changes to parking in the nonmotorized boathouse zone. Local residents are concerned about parking reductions in an area in which parking is already constrained, noting that it is difficult to enter and exit private garages on Water Street in the evenings and on weekends, and that many of the garages are only open during business hours. Both the Potomac Boat Club and Washington Canoe Club expressed concern that the parking near their clubs would be removed and noted It was noted that American's with Disability Act (ADA)-compliant parking would be needed for patrons of both clubs and also the new facilities. One commenter noted that the EA does not adequately account for the parking issues and the impacts of reduced parking and indicated that the 15 spaces used by the Washington Canoe Club would be eliminated, but the spaces for Potomac Boat Club would remain.

Response: The EA describes how Water Street NW could be reconfigured west of 34th Street NW and that DDOT would implement this reconfiguration. Under both the proposed plan in the EA and under the BID's proposal, parking west of 34th Street NW would be greatly reduced, and vehicular access west of the Alexandria Aqueduct (and in the C&O NHP) would be limited to ADA-compliant parking and access for emergency and service vehicles. Potomac Boat Club and owners of the townhouses would continue to have access to their privately owned parking spaces through the public plaza. Washington Canoe Club exists on NPS-administered land, and the parking spaces in use are on public land. Parking in Georgetown and along Water Street overall is not an issue that NPS can resolve because parking is under the purview of DDOT.

Correspondence Id: 10 **Comment Id:** 537478

Comment Text: While we all want to see a vibrant, active Georgetown on the waterfront, the issues of traffic congestion, parking, pedestrian safety, adequate trash pick-up/clean-up, and police monitoring have not been adequately addressed. The District is going to start combining PSAs into larger entities, because of budget and manpower shortfalls. Four more parking spaces on Water Street have been lost to Capital BikeShare. Residents whose parking garages face Water Street or Grace Street already find it difficult to enter or exit their garages on the weekends and during rush hours. Our driveways and ramps are used as parking spaces. Access to Rock Creek Parkway or K Street or I-66 can take forever in the evenings and on weekends. The number of people just driving up and down Water Street trolling for parking spaces is ridiculous. There are only 5 public parking lots on K Street/Water Street, and they all have varying hours - - one of them is closed on weekends.

Organization:

Commenter: N/A N/A **Page:** **Paragraph:**

Correspondence Id: 10 **Comment Id:** 537479

Comment Text: Will the NPS be able to provide for separate, adequate parking for all of the people you expect to use the waterways? Will the NPS work with the MPD to provide adequate traffic control, increased foot/bike patrols, and to enforce parking rules and noise regulations?

Organization:

Commenter: N/A N/A **Page:** **Paragraph:**

Correspondence Id: 49 **Comment Id:** 537681

Comment Text: WABA supports the proposal of off-site parking solutions for tour buses; tour bus parking is not appropriate use of the space within the study area because it is incompatible with heavy pedestrian and bicycle use.

Organization: Washington Area Bicyclist Association

Commenter: Katie Harris **Page:** **Paragraph:**

Correspondence Id: 14 **Comment Id:** 537497

Comment Text: WCC members have parked in spaces adjacent to the club when loading/unloading boats as well as during workouts and team practices for many years. WCC hosts several programs with mobility impaired people and groups, such as the Wounded Warriors program operated by Team River Runner. Providing reasonable accommodations and parking for them is critical to continued use of WCC facilities. Maintaining existing parking is important to WCC.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Correspondence Id: 14 **Comment Id:** 537508

Comment Text: The Plan/EA anticipates that a publicly operated canoe-kayak rental facility similar to Key Bridge Boats will move to Site C (between the Alexandria Aqueduct and WCC) from where it currently is at Site D (see Figure 3 - Alternative 2). NPS also proposes to put much-needed restrooms at Site C. While WCC believes that having a public restrooms and boat rental facility are essential parts of any NMBZ Plan, placing the boat rental facility in this location causes more problems than it solves. First, it increases congestion at the west end of Water Street. There is no public parking in the vicinity.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Correspondence Id: 14 **Comment Id:** 537515

Comment Text: While the table appears to focus on new boathouse facilities, WCC wants to point out that our members currently use about 15 parking spaces near our boathouse. We believe that the Plan/EA should acknowledge this and specify that WCC can continue to use those parking spaces.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Correspondence Id: 14 **Comment Id:** 537544

Comment Text: In the Environmental Consequences discussion, the NPS Plan/EA ignores the parking at the WCC while Potomac Boat Club would retain its approximately 9 parking spaces. Between 23 and 31 public on-street parking spaces would be eliminated in the NPS plan and more than that would be eliminated in the G-BID plan. Retaining some parking and loading/unloading zones near WCC is critically important to our members.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Correspondence Id: 20 **Comment Id:** 537588

Comment Text: With respect to the Action Alternative, PBC expresses its concern over proposed solutions to the reduction of on-street parking and notes the lack of viable alternatives to using private motor vehicles for many of its members.

Organization: Potomac Boat Club

Commenter: Chad Jungbluth **Page:** **Paragraph:**

Correspondence Id: 57 **Comment Id:** 537645

Comment Text: I don't feel the EA sufficiently recognizes the parking issues that already exist in the NMBC at the western end of Water Street. I think planning for the NMBZ should recognize that situation

and look for alternatives that will minimize any additional vehicles that are drawn into that overcrowded area.

Organization:

Commenter: Anthony Johnson **Page:** **Paragraph:**

Correspondence Id: 55 **Comment Id:** 537655

Comment Text: The concerns are: (2) Providing free, public access to the river; and (3) Ensuring sufficient parking.

Organization: D.C. Chapter of the Surfrider Foundation

Commenter: N/A N/A **Page:** **Paragraph:**

AL8100 Land Exchange (Substantive)

Concern: Commenters expressed concern that private use/private ownership of any of the sites would be inappropriate in the zone, and that NPS should operate all facilities directly or through a concessionaire. They noted that all of the structures should have public elements, and the zone should emphasize increasing boating opportunities and access to the river for the general public. Commenters noted that private facilities are inappropriate within the C&O Canal NHP portion of the zone and indicated that a potential rowing program support on the second level of the facility at site C would be inappropriate.

Response: The EA addresses how facilities could be physically accommodated in the zone, but it does not discuss ownership or management of the facilities. NPS would manage the zone and its facilities with the intent that all sites have some form of public access. However, it is possible, and likely, that institutions such as universities and high schools may be permitted use of land or facilities in the zone, and some component of private use could occur. Institutional use could occur through a lease from NPS or rental of rack space from an NPS concession. Institutions could also execute a land exchange with NPS, exchanging private land of equal value elsewhere for fee simple interest in a site. If the site were obtained through a land exchange, NPS could ensure some form of public access through covenants or deed restrictions. Land exchanges would be limited to sites D and E and may be subject to further National Environmental Policy Act (NEPA)/National Historic Preservation Act (NHPA) compliance. Development of any facilities on these sites after a land exchange would be subject to local zoning and development regulations.

Correspondence Id: 41 **Comment Id:** 537749

Comment Text: 4) The "component of private use" (p.21) should be very limited and should not involve NPS ceding ground or allowing exclusive private ownership and use of a new structure. Every structure, even if largely occupied by a university, should have some public elements such as rest rooms and modest snack bars. The emphasis throughout this zone should be on enlarging and enhancing boating opportunities, access to the river, and related amenities for the general public.

Organization:

Commenter: Carrie Johnson **Page:** **Paragraph:**

Correspondence Id: 30 **Comment Id:** 537623

Comment Text: Unfortunately, the table on p. 17 of the EA designates the entire second floor of a maximum-sized building at Site C for "rowing team support." This suggests that the structure and its dock might become an auxiliary for the team rowing. The EA proposed generous new facilities for crew teams at Sites D and E, and their operations such not intrude on the C& O Canal NHP.

Organization:

Commenter: Edmund Preston **Page:** **Paragraph:**

Correspondence Id: 44 **Comment Id:** 537700

Comment Text: Any new facilities within the C&O Canal NHP should be operated by the National Park Service or through an NPS chosen concessionaire and should serve the general public.

Organization: National Parks Conservation Association

Commenter: Stephanie Heidbreder **Page:** **Paragraph:**

Correspondence Id: 39 **Comment Id:** 537741

Comment Text: 3. Support for no new private development within the C&O Canal NHPark, and no major construction in the national historical park (at Sites A&C). Any new facilities there should be managed by NPS or a concessionaire.

Organization:

Commenter: Sally Strain **Page:** **Paragraph:**

Correspondence Id: 8 **Comment Id:** 537471

Comment Text: The EA's provision that schools or universities may become dedicated tenants of NPS-owned facilities within the boathouse zone should not apply within the canal park.

Organization: C&O Canal Association

Commenter: Bill Holdsworth **Page:** **Paragraph:**

Correspondence Id: 8 **Comment Id:** 537473

Comment Text: In its operation, the facility should be a concession that truly serves the general public. To devote half its storage area to rowing team support, which might be allowed under the EA, would be excessive.

Organization: C&O Canal Association

Commenter: Bill Holdsworth **Page:** **Paragraph:**

Kept Private: No

Correspondence Id: 9 **Comment Id:** 537475

Comment Text: For any boathouses ultimately allowed, assuring public access in each case is of real importance. Making prime riverfront land available for some private use might be considered, but it should include meaningful, significant availability for public use in each parcel.

Organization:

Commenter: Ron Lewis **Page:** **Paragraph:**

Kept Private: No

Correspondence Id: 12 **Comment Id:** 537486

Comment Text: Any new facilities within the C&O Canal NHPark must be operated by NPS, either directly or through a concessionaire. Such facilities should be dedicated to serving the general public.

Organization: Defenders of Potomac River Parkland

Commenter: Sally C Strain **Page:** **Paragraph:**

Kept Private: No

Concern: A commenter noted that a land exchange would be an appropriate mechanism for the Washington Canoe Club on site B and should not be limited just to sites D and E. Other commenters noted that any land exchange within C&O Canal NHP would be inappropriate and that an exchange on sites D and E would be more appropriate.

Response: The disposition of the Washington Canoe Club and the site is subject to separate discussions and negotiations between the club and NPS. Land exchanges could be considered as one of several options for development of sites within the zone.

Correspondence Id: 14 **Comment Id:** 537518

Comment Text: In the discussion of land exchanges, NPS states that Land exchanges would be limited to sites D and E. WCC and NPS have discussed opportunities for WCC to acquire land and swap that land for land WCC now leases. We would not like to preclude such opportunities in the future. We

strongly recommend that NPS include wording that would allow WCC to acquire off-site land and exchange it with NPS in the future for land on which our boathouse sits.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Kept Private: No

Correspondence Id: 21 **Comment Id:** 537591

Comment Text: The NPS should not give historic C&O canal land to Georgetown or any other university to build a boathouse. Having it on private land is one thing, but to do this on the public's land is quite something else. I certainly believe in all access and all use, but under no circumstances should a private university be given land. And they should not exchange land.

Organization:

Commenter: John Butler **Page:** **Paragraph:**

Kept Private: No

Correspondence Id: 35 **Comment Id:** 537634

Comment Text: The Environmental Assessment is properly concerned with the appearance and use of the Georgetown waterfront with the competing uses by rowers, cyclists, kayakers, and pedestrians. Yet, many of the proposals contained in the report are dependent upon actions by the District of Columbia government on property outside the control of the National Park Service. We believe that a land exchange, on the appropriate property, is something that the National Park Service can accomplish without the approval of other government agencies. Such an action would be consistent with its responsibilities of stewardship over this important natural resource.

Organization: Friends of Georgetown Rowing

Commenter: Michael J Driscoll **Page:** **Paragraph:**

Kept Private: No

Correspondence Id: 39 **Comment Id:** 537639

Comment Text: 2. Support for possible land exchanges ONLY outside the C&O Canal NHPark (at Sites D&E), but NOT inside the C&O Canal NHP

Organization:

Commenter: Sally Strain **Page:** **Paragraph:**

Kept Private: No

Concern: One commenter indicated that privately owned facilities for the universities would be appropriate within the zones, and the sites should be specifically identified. The privately owned university sites should also include public interest purposes agreed to by NPS and the universities.

Response: As noted in response to other comments, the EA addresses how facilities could be physically accommodated in the zone, but it does not determine ownership or management. Ultimately, disposition of the sites would be determined at the design stage and when funding is available for development to occur.

Correspondence Id: 57 **Comment Id:** 537649

Comment Text: I do believe that there should be locations identified within the NMBZ for Georgetown and GW to build adequate University boathouses that they own, maintain and control. Everyone recognizes that can only happen if there is an appropriate land exchange agreement with NPS that meets all NPS requirements. I also believe that any new privately owned facility should serve one or more public interest purposes and be available for certain public uses that are determined by the facility owner and are agreeable to the NPS.

Organization:

Commenter: Anthony Johnson **Page:** **Paragraph:**

Kept Private: No

Correspondence Id: 35 **Comment Id:** 537739

Comment Text: As a group, we are united in the goal of securing a boathouse for Georgetown University to own and operate. Many rowing alumni have contributed funds to that end to build a boathouse. Two possibilities exist to accomplish that goal. The first alternative would be a land exchange whereby Georgetown would relinquish its ownership of an upstream parcel and the accompanying right of way through the Capital Crescent Trail in exchange for ownership of a suitable parcel closer to Key Bridge.

Organization: Friends of Georgetown Rowing

Commenter: Michael J Driscoll **Page:** **Paragraph:**

Kept Private: No

Correspondence Id: 35 **Comment Id:** 537740

Comment Text: The second alternative would be for Georgetown to continue to develop its site upstream from Key Bridge for the use of its crews and the storage of equipment. That site is located within the C& O Canal National Historic Park. Georgetown's access is inconvenient and would be disruptive to other users of the adjacent park land. If an acceptable land exchange cannot be

accommodated or if further unreasonable delay continues, we will recommend that Georgetown pursue this alternative.

Organization: Friends of Georgetown Rowing

Commenter: Michael J Driscoll **Page:** **Paragraph:**

Kept Private: No

AL9000 Street Configuration Comments on the street configuration the EA and about the proposed Georgetown BID configuration (Substantive)

Concern: Commenters noted that the NPS plan for Water Street and the DDOT/BID proposal for Water Street are inconsistent and suggested that NPS and DDOT work together to refine the proposed street configurations. Commenters expressed support for the BID proposal's location of the turnaround because it is larger and would allow for trailers that could accommodate larger craft such as outrigger canoes. A commenter also requested that NPS acknowledge that the trail connections in the area are important. Commenters remarked on different aspects of the two proposed configurations, such as the location of the cycle track, and encouraged NPS endorsement of other features of the project that are outside the project area. There is concern that the plan analyzed in the EA would increase congestion in the area. Commenters also commented on accommodation of buses: moving the parking and idling areas for buses was viewed favorably, and it was noted that buses could drop passengers off at Water Street and Wisconsin Avenue then park elsewhere. Commenters noted that everything possible should be done to limit traffic past 34th Street NW and to make it obvious that Water Street NW is not a through street. One commenter noted the streetscape and circulation enhancements will benefit the regional trail network given the extensive recreational and commuter use of the Capital Crescent Trail (CCT).

Response: DDOT is a cooperating agency on this plan and worked with NPS to develop the proposed configuration of Water Street NW in the EA alternative. DDOT also worked with the BID on its proposal. Ultimately, DDOT would be responsible for implementing any changes to Water Street, working closely with NPS because of potential right-of-way encroachments. The configuration is conceptual, but it captures the most intense foreseeable impacts. The design and location of features could be adjusted during design to achieve safety and wayfinding goals.

Correspondence Id: 47 **Comment Id:** 537692

Comment Text: 4. With respect to the traffic configuration recommendations, we suggest that the NPS: a. Work with DDOT, which owns the roadways, and community stakeholders, who have a wide variety of interests in this area, to take a harder look at the recommended turnaround circle at 34th Street developed in the DDOT/GBID K Street / Water Street concept plan. We believe that working together, the parties may well conclude that this is preferable to the turnaround shown in the NMBZEA. The circle at 34th is physically larger, and better able to accommodate large vehicles. Parking past 34th contributes significantly to persistent area congestion, while limiting opportunities for pedestrians and bicycles and foreclosing an opportunity to create a more people-oriented segment of Water Street. Since limited vehicle trips (passenger vehicles and trucks with trailers) to boathouses and private residences are accommodated in the DDOT/GBID plan, we believe it serves all interests and does nothing to diminish the boathouse and paddling plans and EA. b. We hope that additional features from the DDOT/GBID K

Street / Water Street concept plan are included or acknowledged in the NPS NMBZEA and corresponding transportation plan, such as the motorcoach drop-and-go spaces on Wisconsin Ave NW, the cycletrack on the south side of the roadway from 29th Street NW to the Key Bridge, the enhanced sidewalks and pedestrian crossings, and the bridge over Rock Creek. With the NMBZEA relying to a great degree on bicycle and pedestrian access to the new boathouses, we urge NPS to acknowledge the area connections that are necessary to support that access (the NCR Paved Trail Plan describes the need for the connections mentioned above, but does not get specific on the design).

Organization: Georgetown Business Improvement District

Commenter: Will Handsfield **Page:** **Paragraph:**

Kept Private: No

Correspondence Id: 14 **Comment Id:** 537513

Comment Text: First, the location is inconsistent with the G-BID/DDOT proposal. Second, 30-feet is not large enough turn-around for vehicles transporting trailers with long outrigger canoes like WCC uses or rowing shells. Also, improved signage telling trucks and buses not to go beyond Wisconsin Avenue on K Street/Water Street could reduce large vehicles in the area.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Correspondence Id: 14 **Comment Id:** 537521

Comment Text: Under the discussion of Alternatives Considered But Dismissed, NPS justifies eliminating reconfiguration of Water Street and trail alignments. As mentioned previously, WCC supports the plans by the Georgetown BID/DDOT to change traffic patterns for bicycles, cars, trucks, and pedestrians in the Water Street / K Street corridor. WCC urges NPS to revise the Plan/EA circulated in July 2016 to address ways to resolve the currently unsafe and congested conditions along the corridor.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Correspondence Id: 51 **Comment Id:** 537671

Comment Text: Roadways and Trail Reconfiguration The proposal will improve connectivity and public access along the waterfront. The plan includes a cul-de-sac with a mountable curb at the end of Water Street, NW, improved signage, and wayfinding. The CCT multiuse trail extension on the south side of Water Street between the existing Whitehurst Freeway columns, connecting to Georgetown Waterfront Park will improve safety by separating cyclist and pedestrians from vehicular traffic. NCPC staff finds that the streetscape and circulation enhancements will benefit the regional trail network given the extensive recreational and commuter use of the CCT.

Organization: NCPC

Commenter: Diane Sullivan **Page:** **Paragraph:**

Correspondence Id: 14 **Comment Id:** 537524

Comment Text: Under the section on Mitigation Measures for the Alternatives, NPS states that its proposed measures will mitigate transportation impacts for bicycles, pedestrians, truck and buses and traffic in general. In fact, the NPS proposal is likely to increase congestion at the west end of Water Street. As previously stated, WCC supports the G-BID/DDOT proposal for realigning Water Street.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Correspondence Id: 14 **Comment Id:** 537547

Comment Text: We believe that the Georgetown BID/DDOT plan overall, particularly west of 34th Street, is far better than the NPS proposal. For instance, 1) G-BID/DDOT proposes to close off K Street/Water St W of 34th St to almost all traffic while providing access for WCC, PBC and townhouses, 2) G-BID/DDOT proposal eliminates public parking west of 34th Street. 3) G-BID/DDOT Water St becomes a pedestrian friendly plaza for events; and 4) G-BID/DDOT has physically separate bicycle lanes between the Capital Crescent Trail and Rock Creek Parkway hiker-biker trails (with a new bridge across the creek).

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Correspondence Id: 34 **Comment Id:** 537631

Comment Text: We support the Georgetown BID's plan for the congested area on Water Street as it provides clear lanes for the different users as well as removing the bus parking from Water Street. Busses can drop off visitors at the foot of Wisconsin Avenue at the intersection of K and Water Streets. The busses then should proceed to parking areas along the E Street expressway.

Organization: Friends of Georgetown Waterfront Park

Commenter: Robert vom Eigen **Page:** **Paragraph:**

Correspondence Id: 57 **Comment Id:** 537648

Comment Text: I favor the traffic plan called for in the Georgetown BID/DDOT plan and not the one proposed in the EA. I think we should do everything possible to reduce vehicular traffic beyond 34th Street and make it clear that at that point Water Street is not a through road.

Organization:

Commenter: Anthony Johnson **Page:** **Paragraph:**

Correspondence Id: 54 **Comment Id:** 537659

Comment Text: While the CCCT is in general agreement with the report, particularly its holistic approach to the proposed area for boathouse development, the success or failure of this project is highly dependent on getting the details right as actual improvements are put forward. The CCCT looks forward to working with NPS as these specific improvements 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&O NHP).

Organization: Coalition for the Capital Crescent Trail

Commenter: N/A N/A **Page:** **Paragraph:**

Correspondence Id: 49 **Comment Id:** 537684

Comment Text: Reconsider the location of the cul-de-sac. By placing the cul-de-sac further east from the proposed location, bicyclists and pedestrians will have a longer car-free zone, while maintaining access for boathouse traffic. The location proposed in the K & Water Street Corridor Bicycle - Pedestrian Connectivity Enhancements study, completed by DDOT and Georgetown BID, at 34th Street NW, is our preferred location for the cul-de-sac. The steel girders provide for a wider turnaround circle than the concrete support pillars to the west. With proper street design, it will be clear to users how the space to the west of the cul-de-sac should be used.

Organization: Washington Area Bicyclist Association

Commenter: Katie Harris **Page:** **Paragraph:**

EC Cultural Resources comments on analysis of impacts to cultural resources (Substantive)

Concern: Commenters expressed concern about development on sites A and C in the C&O NHP and indicated that development could affect the historic character of the area. Some commenters opposed any development because it would affect the historic character of the area, and others stated that any new development should be done in such a way that it is consistent with historic character.

Response: The area in which the zone is located was historically the site of nonmotorized recreational boathouses. Design and review would ensure that the new facilities are consistent with the historic character of the area and with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*.

Correspondence Id: 44 **Comment Id:** 537750

Comment Text: Development at Site A and Site C, located within the C&O Canal NHP should have no new private development as the potential impacts from major construction would be detrimental to the valuable historic area.

Organization: National Parks Conservation Association

Commenter: Stephanie Heidbreder **Page:** **Paragraph:**

Correspondence Id: 24 **Comment Id:** 537615

Comment Text: Another point for not allowing building construction above the Alexandria Aqueduct is the planned reconstruction of the Canal in Georgetown. Any new buildings between the towpath and rivers edge in this area would not fit with the Canal's historical and cultural significance.

Organization: Washington County (MD) Bird Club; Maryland Ornithological Society.

Commenter: John Lefebure **Page:** **Paragraph:**

Correspondence Id: 44 **Comment Id:** 537702

Comment Text: Development of facilities for recreation should be done in a way that avoids impacts to the park's historic and natural resources.

Organization: National Parks Conservation Association

Commenter: Stephanie Heidbreder **Page:** **Paragraph:**

Correspondence Id: 39 **Comment Id:** 537742

Comment Text: 4. Support for the least intense new development (or none) next to the historic Alexandria Aqueduct (at Site C) and next to the historic Washington Canoe Club (at Site A) within the C&O Canal NHPark.

Organization:

Commenter: Sally Strain **Page:** **Paragraph:**

Concern: Commenters expressed concern about placing any viewing platforms or facilities on top of Alexandria Aqueduct because of potential effects on historic resources and concerns about facilitating vandalism of the Potomac Boat Club from the top of the aqueduct.

Response: The viewing platform has been removed from the EA. Please see errata.

Correspondence Id: 20 **Comment Id:** 537589

Comment Text: With respect to the Action Alternative, PBC does not support the location of a public viewing terrace on top of the Alexandria Aqueduct Bridge remnant. As noted in the EA, PBC's facility is listed on the National Register of Historic Places. More than 100 years old, this historic building is already vulnerable to vandalism and other security threats from the Aqueduct. Given the unpatrolled and unsupervised nature of the C&O Canal Park at night and during daylight hours, such an elevated and uncontrolled point of access immediately adjacent to PBC would constitute a threat to the structure and its users.

Organization: Potomac Boat Club

Commenter: Chad Jungbluth **Page:** **Paragraph:**

EC1200 Transportation Comments on transportation and traffic analysis (Substantive)

Concern: A commenter recommended that multi-use trails be at least 12-feet wide, per American Association of State Highway and Transportation Officials (AASHTO) standards for bicycle facilities.

Response: Trails would be consistent with AASHTO standards where possible. The trail followed Federal Highway Administration standards for bicycle facilities and exceeded District of Columbia standards. The trail as proposed would include 10 feet of paved area for the trail, plus 2 feet of shoulder on either side. Physical constraints require the trail to be narrower where it must pass through the Alexandria Aqueduct arch and the pilings for the Whitehurst Freeway. Alternate spaces and routes would be available for pedestrians in the public plaza and by the Whitehurst Freeway piers. Therefore, it makes little sense to narrow the trail, widen it, and then narrow it again. Between the Alexandria Aqueduct and the cul-de-sac, pedestrians would be able to walk in spaces other than the bike path. As DDOT implements the improvements to Water Street NW, it will look for opportunities to maintain the 12-foot-wide, high-use trail standard if possible and provide safe transitions beneath the pilings. See errata for further clarification in the EA.

Correspondence Id: 49 **Comment Id:** 537685

Comment Text: As the study notes, the proposed non-motorized zone will attract additional bicycle and pedestrian trips to and through the study area. Particularly in these pedestrian heavy areas, a multi-use trail functions best when it is wide enough to mix different uses. The American Association of State Highway and Transportation Officials (AASHTO) trail standards recommend 12 foot width on trails where heavy use is anticipated.

Organization: Washington Area Bicyclist Association

Commenter: Katie Harris **Page:** **Paragraph:**

Concern: Commenters expressed concern that the short-term construction impacts, including access for construction vehicles be considered in the analysis. These impacts affect cyclists and pedestrians in the area during any construction periods, and commenters noted that rerouting bicycle traffic onto the canal towpath could be an inadequate solution.

Response: Short-term construction impacts (and their avoidance) are described generally in the EA under appropriate impact topics for construction that would have short-term impacts, specifically water resources, transportation, and visitor use. Specific staging areas, access points, and alternative routes for the CCT cannot be identified until designs have proceeded further and the order in which the sites would be developed has been established.

Correspondence Id: 7 **Comment Id:** 537470

Comment Text: However, I sincerely hope that the needs of cyclists and commuters are accommodated during the construction period too. Many thousands of us ride through the zone every day - and we hope that we won't be terribly inconvenienced during construction. Simply re-routing us for extended periods of time onto the gravel tow-path along the canal would not be sufficient, in my view. My bicycle and many that I see on the CCT are road bikes, fit for paved trails and city streets, not the dirt and rocky tow-path trail, subjecting us to the likelihood of more tire punctures, accidents and overall dirtier commutes in wet or muddy conditions. If such re-routing is at times unavoidable or the best of undesirable options, then I/we would certainly appreciate your efforts to limit the duration of those times.

Organization:

Commenter: Timothy Ryan **Page:** **Paragraph:**

Correspondence Id: 14 **Comment Id:** 537499

Comment Text: The Plan/EA acknowledges that WCC expects to rehabilitate and restore the clubhouse. Doing so will require access to the property by large trucks and heavy equipment as well as short-term storage for supplies. We need to identify appropriate access and parking for rehabilitation-related work.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Concern: Commenters are concerned about conflicts among motor vehicles, bicycles, and pedestrians on Water Street and indicated that the EA does not address these concerns.

Response: Conflicts between users along Water Street NW are many. NPS worked with DDOT to find as many solutions as possible to these conflicts and to improve the situation to the extent possible. Because the plan is conceptual, design and implementation may be refined as design progresses.

Correspondence Id: 14 **Comment Id:** 537545 **Coder Name:**

Comment Text: Traffic: Automobiles, buses, trucks, bicycles, and pedestrians are not mixing well along the K Street/Water Street corridor. Existing conditions for all users are unsafe. The Traffic Impact Assessment documents the congestion and need to improve conditions for all there. Unfortunately, while the Plan/EA contains detailed traffic intersection analyses, the NPS proposed action does little to reduce the congestion and unsafe conditions along Water Street.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Concern: A commenter noted that the K street Transit Project does not make sense.

Response: The K Street Transit Project is not an NPS project.

Correspondence Id: 56 **Comment Id:** 537653

Comment Text: Based on a careful review of the documents, I don't believe a K street transit makes sense. I believe increasing the time of the light at the end of the WH freeway ramp would improve traffic flow, as would lights that deconflict pedestrians at peak hours.

Organization:

Commenter: Larry Schuette **Page:** **Paragraph:**

Concern: A commenter suggested that NPS work with Capital Bikeshare to increase the number of bikeshare locations available once development of the facilities is complete.

Response: DDOT would implement the improvements to Water Street, including any additions of Capital Bikeshare facilities. NPS may work with DDOT and Capital Bikeshare, as appropriate, as the project progresses and DDOT redesigns Water Street NW, if demand is adequate and siting for Capital Bikeshare facilities is available.

Correspondence Id: 55 **Comment Id:** 537658

Comment Text: * Addition of Capital Bikeshare locations at or near the improvements may also help with decreasing vehicular traffic. The Plan does not discuss the addition of such locations beyond normal annual growth (Plan, pg. 68), but the D.C. Chapter recommends NPS working with DDOT to have expanded bikeshare locations available upon completion of the development. * Additional stops at Wisconsin and Water Street by Metrobuses and the Circulator to service the development. * Dedicated parking for visitors using boathouse facilities or launch areas.

Organization: D.C. Chapter of the Surfrider Foundation

Commenter: N/A N/A **Page:** **Paragraph:**

Correspondence Id: 49 **Comment Id:** 537680

Comment Text: The Water/K Street Bicycle - Pedestrian Connectivity Enhancements Plan (a project of DDOT and Georgetown BID) also focus on this corridor. Multiple plans have made this trail connection a regional priority, so it must be designed to handle a high volume of bicyclists of all skill levels.

Organization: Washington Area Bicyclist Association

Commenter: Katie Harris **Page:** **Paragraph:**

Concern: A commenter asked for clarification about what a shared bike lane means in the area between the trail and the cul-de-sac.

Response: The shared bike lane between the trail and the cul-de-sac is an area demarcated for cyclists, but it is within a public plaza, so it cannot be separated from pedestrian uses. Cars parking in the private spaces may need to cross the lanes. This has been clarified in the errata.

Correspondence Id: 49 **Comment Id:** 537683

Comment Text: On Table 1 on Page 15, under the category Multi-use Trail, NPS has listed Shared bike lanes in Water Street NW with transition between trail and cul-de-sac. What is meant by shared bike lanes here? Does that mean there will be a lane with sharrows?

Organization: Washington Area Bicyclist Association

Commenter: Katie Harris **Page:** **Paragraph:**

EC24000 Visual Quality (Substantive)

Concern: Commenters expressed concerns about the height of the proposed structures, stating that they should be below the height of the Alexandria Aqueduct and the canal levee. Other commenters expressed concern that the structures should be compatible in massing, bulk, and style with the existing facilities and features. One commenter noted that a boathouse on site E should not obstruct views of the water from Georgetown Waterfront Park, and that the proposed facility would be larger than the site should accommodate. Another commenter stated that the least intense options for sites A, B, and C would be appropriate, to preserve views and area character. Several commenters expressed concerns that the boathouses would be too large.

Response: NPS has used the maximum heights and footprints so that the most intense impacts can be characterized in the EA. Final heights and footprints would be determined during the design process and would consider context and views. Views from Georgetown Waterfront Park would not be obstructed.

Correspondence Id: 41 **Comment Id:** 537748

Comment Text: 2) The EA (pp. 61-2) minimizes the possible visual impacts of the proposed new structures on the historic riverfront setting. It's not sufficient to rely on extensive multi-agency review. The new structures' potential heights should be further limited, so that none of them is taller than the C&O Canal towpath or an adjacent historic structure such as the Aqueduct abutment (for C). Moreover, the EA should state more firmly that new structures should be compatible in massing, bulk and style with the existing boat clubs.

Organization:

Commenter: Carrie Johnson **Page:** **Paragraph:**

Correspondence Id: 8 **Comment Id:** 537472

Comment Text: If a boat storage and rental facility is established at Site C, its dimensions of should respect the public nature of the location. Park visitors using the Capital Crescent Trail should be able to enjoy views of the river and not be crowded closely between the structure and the canal berm. The structure's height should not obstruct the scenic view shed; it should not even approach the maximum permitted under the EA, which would allow the building a higher elevation than the canal towpath.

Organization: C&O Canal Association

Commenter: Bill Holdsworth **Page:** **Paragraph:**

Correspondence Id: 9 **Comment Id:** 537476

Comment Text: - If a boathouse is permitted down-river (on the Waterfront Park side) of Key Bridge, the size of the boathouse should not be so large that it interferes with the principal view, which is of the river and Key Bridge. The suggestion in the Environmental Assessment of a large boathouse with a footprint of up to 13,800 square feet and three stories in height strikes us as possibly in need of further study and could be more than the site should hold.

Organization:

Commenter: Ron Lewis **Page:** **Paragraph:**

Correspondence Id: 12 **Comment Id:** 537484

Comment Text: Any development at Sites A-C, located within the C&O Canal NHPark, should adhere to the least intense development options. This would preserve the tidal shoreline and view shed, and safeguard the experience of park visitors to the wooded environment of the area upriver from the Alexandria Aqueduct.

Organization: Defenders of Potomac River Parkland

Commenter: Sally C Strain **Page:** **Paragraph:**

Correspondence Id: 19 **Comment Id:** 537574

Comment Text: I sincerely hope you will ensure that any new structures in the upriver section of the boathouse zone do not compromise the area's historic and scenic importance. If a boat storage/rental operation is built at Site C, the building should not obstruct the views of the river.

Organization:

Commenter: Lisa Rosenthal **Page:** **Paragraph:**

Correspondence Id: 21 **Comment Id:** 537590

Comment Text: No boat house should be constructed that interferes with this or the view easement.

Organization:

Commenter: John Butler **Page:** **Paragraph:**

Correspondence Id: 24 **Comment Id:** 537614

Comment Text: However, The NPS should not give an inch for any such buildings and construction above the Alexandria Aqueduct abutment. Yes, the boating community has a right to access the waterfront, just as the birding, hiking, cycling, and nature appreciating community has a right to the

natural beauty of the C&O Canal NHP. But the Canal's history and culture since its beginning in 1828, and its evolution into one of the most visited Parks for hiking, cycling, camping, and appreciation of Nature demand no new buildings.

Organization: Washington County (MD) Bird Club; Maryland Ornithological Society.

Commenter: John Lefebure **Page:** **Paragraph:**

Correspondence Id: 30 **Comment Id:** 537622

Comment Text: The maximum facility footprint of 6,000 square feet is clearly excessive. Such a large footprint would overcrowd a narrow area already heavily used by bicyclists and pedestrian park visitors, and where a certain amount of vehicular traffic is unavoidable. Even more troubling is the maximum height of 35 feet, which is higher than the canal towpath, as the profile on p. 17 shows. A building rising anywhere near such a height would be a major obstruction to an important view shed that includes the historic aqueduct and the Potomac River.

Organization:

Commenter: Edmund Preston **Page:** **Paragraph:**

Correspondence Id: 44 **Comment Id:** 537697

Comment Text: We are concerned about the potential impacts of new development upon the natural, historic, and cultural resources of the area, as well as upon the scenic views within the Potomac Gorge if large structures are permitted within C&O Canal NHP (Sites A & C);

Organization: National Parks Conservation Association

Commenter: Stephanie Heidbreder **Page:** **Paragraph:**

Correspondence Id: 26 **Comment Id:** 537736

Comment Text: I agree with the heights of 35-45' as these structures are adjacent to Key bridge and will not compete with its monumental scale. I feel that a setback of 25' from the aqueduct, on page 36, is too generous and recommend 15'.

Organization:

Commenter: John G Parsons **Page:** **Paragraph:**

Concern: A commenter requested that square footages be stated as approximates to allow for design flexibility.

Response: The EA captures the maximum sizes that are likely feasible on the sites. Supplemental NEPA studies could occur if the sizes are grossly out of alignment with these numbers. Small overages (in the range of a few hundred square feet), if even possible, would not affect the impacts described.

Correspondence Id: 23 **Comment Id:** 537611

Comment Text: We would recommend, however, that square footage references in the plan be framed as approximates to permit some flexibility, especially in light of our intention to design a boathouse that would be consistent with the history of rowing along the Potomac.

Organization: Georgetown University

Commenter: N/A N/A **Page:** **Paragraph:**

GA2000 Agency Consultation (Substantive)

Concern: A commenter recommended that NPS coordinate with appropriate District of Columbia agencies as implementation of the plan proceeds.

Response: NPS and its partners would coordinate with appropriate District of Columbia agencies as the plan implementation proceeds. DDOT is a cooperating agency, and the EA describes other pertinent regulations and necessary coordination.

Correspondence Id: 51 **Comment Id:** 537678

Comment Text: NCPC staff recommends that NPS further coordinate with the District of Columbia Department of Transportation (DDOT) Public Space Committee, the Department of Energy and Environment (DOEE), District of Columbia Water and Sewer Authority (DC Water) and other agencies to comply with local standards and obtain required permits.

Organization: NCPC

Commenter: Diane Sullivan **Page:** **Paragraph:**

Concern: A commenter recommended that the Georgetown Rosslyn Gondola feasibility study be included as a cumulative action.

Response: The Georgetown Rosslyn Gondola Feasibility study is only a feasibility study and is therefore not reasonably foreseeable as a future project. The outcome of the study was also not available at the time the EA was published for public review.

Correspondence Id: 51 **Comment Id:** 537674

Comment Text: The Georgetown Rosslyn Gondola feasibility study should be included as part of foreseeable future projects.

Organization: NCPC

Commenter: Diane Sullivan **Page:** **Paragraph:**

ON1000 Other NEPA Issues: General Comments (Substantive)

Concern: A commenter noted that NCPC was incorrectly described in the References and Acronyms and abbreviations section.

Response: These issues have been addressed in the errata to correct the spelling of “Capital” and correctly identify the NCPC acronym in the acronym list.

Correspondence Id: 51 **Comment Id:** 537675

Comment Text: References (page 92) and Acronyms and Abbreviations (page 97): National Capital Planning Commission (NCPC).

Organization: NCPC

Commenter: Diane Sullivan **Page:** **Paragraph:**

Concern: A commenter requested that the public involvement related to the publication of the EA be more open, all the public comments be made public, and a public meeting be held. Other commenters requested greater community outreach and suggested that NPS consult with the public as development plans are prepared. Another commenter noted that it is not clear if this is a draft or final EA.

Response: NPS has provided the public opportunities to comment online and in writing at public scoping and when the EA was published for public review. Emails were sent to the stakeholders’ mailing list alerting them of the EA availability for review and comment. Outreach during the planning process included NPS public presentations to the relevant Area Neighborhood Commissions and meetings with DDOT, state historic preservation offices, and NCPC to share details of the plan. NPS has published a single EA for public review; there is not a separate draft or final version. The comment analysis report in the Finding of No Significant Impact (FONSI) (this document) includes substantive comments from all correspondences received and responses to concern statements developed from these comments. The FONSI includes an errata sheet to address changes to the EA. As sites in the zone are developed, future public involvement will occur through NCPC review, review of the Old Georgetown Board, and through other review processes related to the historic preservation process.

Correspondence Id: 39 **Comment Id:** 537745

Comment Text: 7. Request NPS to consult the public whenever they consider the specific plans for the proposed boathouse zone (at Sites A-E).

Organization:

Commenter: Sally Strain **Page:** **Paragraph:**

Correspondence Id: 38 **Comment Id:** 537636

Comment Text: On another subject: NPS should revise the secrecy policy of the EA procedure. All comments and submissions should be made public. This requirement would promote the free exchange of

ideas and positions and promote dialogue. Such transparency would assure a more acceptable EA. Participants would not feel shut out of the process. Also, as this EA is the "final" word in the absence of some earth-shattering event, NPS should sponsor an open meeting at which time the public would have an opportunity to ask questions, and I, for one, am certain there are a lot of questions.

Organization:

Commenter: Robert B Norris **Page:** **Paragraph:**

Correspondence Id: 22 **Comment Id:** 537606

Comment Text: Finally, we have tried to engage on all governmental levels with individuals regarding this process, yet no one has ever come to discuss this plan with us. We would suggest greater community outreach during planning periods

Organization: 3528 K. Street

Commenter: Stephen T Miller **Page:** **Paragraph:**

Correspondence Id: 14 **Comment Id:** 537555

Comment Text: NPS has titled the Plan/EA as an environmental assessment without specifying whether it is a draft or final EA. Because NPS has not identified the document as a draft, we can only assume that NPS presumes it is final. That concerns WCC and others.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Concern: A commenter requested an implementation plan, timeline, and budget for implementing the plan for the boathouse zone.

Response: The implementation of the zone and construction of the facilities is contingent upon availability of willing partners and funding, and design of the facilities would dictate budget. Therefore details about budget and timing are not available at this time.

Correspondence Id: 14 **Comment Id:** 537556

Comment Text: There does not appear to be an implementation plan, a timeline, or a budget for implementing the Plan. WCC and members of the public want to understand how NPS is going to make important decisions about what entities get to construct new facilities in the NMBZ.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Correspondence Id: 14 **Comment Id:** 537522

Comment Text: Also as mentioned elsewhere, NPS never responded to public requests to expand the boundaries of the non-motorized boating zones along the Potomac.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

Correspondence Id: 12 **Comment Id:** 537487

Comment Text: NPS should consult the public again once they begin to consider the specifics of any of the projects.

Organization: Defenders of Potomac River Parkland

Commenter: Sally C Strain **Page:** **Paragraph:**

Correspondence Id: 10 **Comment Id:** 537481

Comment Text: It seems that for every big project that NPS or Georgetown BID dreams up to attract more people to Georgetown, there is not enough weight given to the desires and needs of those who actually live here 24/7.

Organization:

Commenter: N/A N/A **Page:** **Paragraph:**

PN3000 Purpose And Need: Scope Of The Analysis (Substantive)

Concern: A commenter recommended that the zone include space for power boaters and powerboats because there is an acute lack of docking space along the Potomac River, and in the commenter's opinion, there is no conflict between motorized boats and nonmotorized craft. The commenter recommends that dinghy docking at least be accommodated, similar to the dinghy dock in the Annapolis harbor.

Response: Inclusion of powerboating facilities is not within the scope of this plan and was not included in the purpose and need that was addressed, which is "to establish a Potomac River recreation zone that more fully supports nonmotorized recreation; increases the public's access to the river; improves functionality of the CCT as it connects to Georgetown Waterfront Park; and respects the historic character, natural resources, and existing recreational use of the C&O Canal NHP and Rock Creek Park."

Correspondence Id: 5 **Comment Id:** 538280

Comment Text: 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 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.

Organization: Chesapeake Bay Yacht Clubs Association

Commenter: Harold Seigel **Page:** **Paragraph:**

Correspondence Id: 5 **Comment Id:** 537464

Comment Text: 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.

Organization: Chesapeake Bay Yacht Clubs Association

Commenter: Harold Seigel **Page:** **Paragraph:**

Concern: A commenter suggested that further study would be warranted to replace the Washington Canoe Club structure if it cannot be renovated.

Response: The disposition of the Washington Canoe Club is subject to discussions between the club and NPS and to fundraising efforts by the club that are not within the control of the NPS. Alterations to the building would be a separate action, subject to additional NEPA and NHPA compliance.

Correspondence Id: 48 **Comment Id:** 537688

Comment Text: After the action alternative is adopted, further work should be done on - 1. Analysis of the optimal solution for Site B - if the Canoe Club does not have sufficient resources to rehabilitate its boathouse, there should be an exploration of the possibility of a partnership with another public or private entity so that sufficient resources can be made available and an aesthetically pleasing, functional structure can be deployed on the site. This may involve providing access to the site to individuals or

institutions not currently members of the Club. The current situation at this site is unacceptable and could be dangerous if the building were to collapse or deteriorate; 2. Exploration of a bypass for bicycle traffic which would start upriver from the area and route this traffic either along the towpath or toward the river side of the road so that vehicular traffic could proceed further upriver without competing with bicycle traffic. Such a bypass might involve significant expense but development rights for upriver sites could be made available to institutions willing to share in the expense.

Organization: pacific economics group

Commenter: philip j. mause **Page:** **Paragraph:**

Concern: Commenters expressed concern that Thompson's and other car-top launch points were not considered in this EA. Another commenter noted that launch points outside the zone may be more appropriate.

Response: Thompson's and other car-top locations were not considered because the purpose of the plan was to determine facilities and configurations possible within the zone.

Correspondence Id: 34 **Comment Id:** 537629

Comment Text: The facilities at the site of the former Jack's and at Thompson's were seen as meeting this new demand for paddling, canoeing, and kayaking. This EA, however, veers from all the previous planning on this matter. By not studying Thompson's as part of this EA, it is difficult to assess how this non-motorized boating demand will be met. We have no numbers.

Organization: Friends of Georgetown Waterfront Park

Commenter: Robert vom Eigen **Page:** **Paragraph:**

Correspondence Id: 14 **Comment Id:** 537553

Comment Text: NPS provided no reasoning for excluding TBC or other sites along the Potomac on NPS managed lands in Washington DC. For instance, if an objective of NPS is to encourage non-motorized boating on the Potomac, why didn't NPS evaluate locations out of the Georgetown NMBZ area where car-top canoes and kayaks might launch?

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

PN4000 Purpose And Need: Park Legislation/Authority (Substantive)

Concern: Commenters noted concerns about consistency of the proposed project with the NPS mission and the purpose and significance of the C&O Canal NHP. Two commenters noted that if done properly, facilities would be consistent; another commenter noted that NPS must be careful not to promote

recreational activities at the expense of the park's resources, public safety, and use and experience of other visitors.

Response: The zone is located in an area that has historically been home to nonmotorized recreational facilities and does not have sensitive or unusual vegetation, so it would not conflict with the mission and significance of the C&O Canal NHP.

Correspondence Id: 44 **Comment Id:** 537701

Comment Text: 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.

Organization: National Parks Conservation Association

Commenter: Stephanie Heidbreder **Page:** **Paragraph:**

Correspondence Id: 19 **Comment Id:** 537576

Comment Text: If NPS subjects construction of such a facility to the same careful review process used to prepare the overall boathouse development plan, I am certain that the boat storage/rental facility will respect the park's identify and the mission of the NPS.

Organization:

Commenter: Lisa Rosenthal **Page:** **Paragraph:**

Correspondence Id: 8 **Comment Id:** 537474

Comment Text: Within carefully planned limits, however, a boat storage/rental facility at Site C could be an asset consistent with the canal park's mission.

Organization: C&O Canal Association

Commenter: Bill Holdsworth **Page:** **Paragraph:**

PN9000 Purpose And Need: Issues And Impact Topics Selected For Analyses (Substantive)

Concern: A commenter noted that the configuration of the facilities could mean that it would be difficult for paddlers bringing their own craft to launch their boats or stand-up paddleboards, because they would have to carry them or wheel them through a busy area, and indicated that NPS has therefore not met its objective of providing easy public access for this particular activity.

Response: The plan provides options for the most feasible access within the zone for privately owned paddlecraft and proposes temporary storage facilities for privately owned paddlecraft while users park

their cars. The plan also focuses drop off and storage for paddlecraft within the public plaza area at the end of Water Street NW to minimize user conflict in this busy urban area.

Correspondence Id: 14 **Comment Id:** 537510

Comment Text: Second, with the turning circle where NPS proposes it, the facility would be beyond the gate restricting access to the docks and launch site. People wanting to launch their boats there would have to carry them or put them on wheeled dollies. Accordingly, NPS has not met one of its primary objectives of providing easy public access for launching kayaks, canoes, and paddleboards for people who transport them to the Potomac on their vehicles.

Organization: Washington Canoe Club

Commenter: Andrew G Soles **Page:** **Paragraph:**

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APPENDIX E: Errata

Georgetown Nonmotorized Boathouse Zone Development Plan and Environmental Assessment *Rock Creek Park* *Chesapeake & Ohio Canal National Historical Park*

The following changes have been made to the Georgetown Nonmotorized Boathouse Zone Development Plan and Environmental Assessment (July 2016) Finding of No Significant Impact (FONSI) to correct minor statements of fact and update information. Additions to the text are identified by **red text** and deletions are marked by ~~strikeout~~ unless otherwise noted. These revisions do not change the outcome of the impact analysis, nor affect the final decision documented in the FONSI.

In response to clarifying discussions with the District Department of Transportation (DDOT), a cooperating agency, it was determined that DDOT would be the agency responsible for the improvements to the streetscape on Water Street, and that the configuration of the streetscape is conceptual. Most intense impacts are described in the environmental assessment (EA).

Project Summary East of the Potomac Aqueduct Bridge abutment, colloquially known as the Alexandria Aqueduct, the action alternative includes optional configurations for a boathouse and plaza on site D, a proposed **conceptual** reconfiguration of the streetscape to improve the connections of the CCT and Georgetown Waterfront Park, and access to the private properties in the zone.

Page 1 At the end of the first paragraph in the Introduction, add: **“The National Park Service and the District Department of Transportation worked together to develop conceptual solutions to the streetscape. The District Department of Transportation is a cooperating agency on this environmental assessment.”**

Page 20 ***Other Improvements***
Reconfiguration of Roadways and Trail. The reconfiguration of public spaces in relationship to the proposed new facilities and the street in site D would maintain and improve access to the townhouses, Potomac Boat Club, and Washington Canoe Club. The end of Water Street NW could feature a cul-de-sac constructed with a mountable curb, improved signage, and other wayfinding and use different pavement surfaces through the transition between the Alexandria Aqueduct and the cul-de-sac. Wayfinding improvements for motorists, cyclists, and pedestrians could include a variety of signage at the cul-de-sac and on the CCT and changes in pavement texture and/or color where transitions occur or potential user conflicts could arise. **The configuration of the cul-de-sac is conceptual and was developed with the input of the District Department of Transportation, which would implement this portion of the project, in close coordination with the National Park Service.** Details would be determined at design **and through close collaboration between the two agencies.**

Page 25 Replace the “traffic” section with the following:
Traffic. Recommended improvements to mitigate traffic impacts related to the implementation of the action alternative in the larger transportation study area include the following (more details on why these improvements are recommended are included in the TIA), although a transportation study following DDOT’s Comprehensive Transportation Review process will be required at the time of facility development:

- K Street NW and 31st Street NW (Intersection #5): Signalize this intersection.
- K Street NW and 30th Street NW (Intersection #7): Signalize this intersection.

Clarification of revegetation with Native plant species and pollinator-friendly plants

Page 6

Add the following text to the vegetation dismissal:

- Some vegetation (i.e., trees, turfgrass, and ground cover) may be disturbed or removed during the construction of new facilities. Some vegetation removal would be permanent. Other areas would be landscaped or replanted as possible, depending on the final design. Any trees removed would be replaced with native trees in the project area or within 1,000 feet of the project area boundary. Existing vegetation was assessed in a previous study and is reported to consist of species typical of disturbed sites, including both herbaceous plants and trees (NPS 2013). Flooding and ice dams occur periodically and destroy forest cover in this landscape; therefore, new colonizing species and young trees are typical. Much of the vegetation documented in the previous study includes nonnative invasive species. Impacts on vegetation would therefore be relatively minimal because of the condition of the vegetation, the ability to add landscaping (i.e., ground cover and shrubs) to remaining open areas, and the emphasis on site landscaping and tree replacement. **Added vegetation would be native and would be planted appropriately according to the habitat.** Therefore, vegetation has been dismissed from further consideration. Impacts on wetland vegetation are discussed in the “Water Resources” section of chapters 3 and 4 of this EA.

Delete reference to grills on site A throughout the document

Page 13

Site A: Site A would include shoreline improvements, a sloped shoreline launch for canoes/kayaks/paddleboards, a picnic area that could include tables ~~and grills~~ or other amenities, and a trail/boardwalk through the site. Based on future need, site development may include the option of constructing a small, single-story boat storage area with a footprint of no greater than approximately 2,700 square feet.

Page 71

Under alternative 2, the sidewalks on either side of Water Street NW from just east of the Key Bridge overpass to the new cul-de-sac would be extended, and the authorized access driveway areas would be made clear to users in the area. These additions would significantly reclaim space for pedestrians and support the additional users that would be generated from the proposed development. Public pedestrian access to site A would be provided across the Washington Canoe Club apron area, and additional pedestrian amenities would be provided **in the zone in** the form of orientation and interpretive exhibits, picnic tables ~~and grills~~, public restrooms, a rental kiosk, and seasonal outdoor boat storage.

Page 80

In addition to increased capacity, alternative 2 would provide new access types and visitor amenities, including a soft entry kayak launch for walk on and rental visitors, car-top launch drop off space and lockers for visitors without storage space, public restrooms, picnic ~~and grill~~ areas, public plaza space, and trailhead orientation and interpretive exhibits. These additions would provide convenient, accessible locations for visitor services and recreational and increased park amenities, thereby enhancing the visitor experience and increasing visitation. As a result of these improvements and increased visitation, impacts on visitor use and experience would be long term and beneficial.

Accommodation of DC Water Infrastructure

Page 13

Add to the end of the Site C bullet: “The facilities on the site would be designed to accommodate access to the existing DC Water infrastructure on the site.”

Page 28 One of these tunnels was proposed for underneath the project site, **but it is likely that if other green infrastructure measures work in Georgetown**, its length **will be** shortened so that it will no longer pass underneath NPS land in the project area (DC Water 2016).

Removal of viewing Terrace on the Aqueduct

Page 15 In the Alexandria Aqueduct row of the table, delete the bullet point:

- “Viewing terrace on top”

Page 61 Delete the sentence: “Direct impacts also would occur as a result of the installation of a viewing terrace on top of the Alexandria Aqueduct and boat storage below the aqueduct arch.”

Clarifications on Shared Bike lanes and trail width

Page 15

Multituse Trail	<ul style="list-style-type: none">• CCT transitions to 10-feet wide (with additional 2-foot shoulders) east of the Alexandria Aqueduct and continues on south side of Water Street NW between Whitehurst Freeway columns, connecting to Georgetown Waterfront Park• Shared bike lanes in Water Street NW with transition between trail and cul-de-sac• Note: The shared bike lane between the trail and the cul-de-sac is an area demarcated for cyclists, but it is within a public plaza so it cannot be separated from pedestrian uses. Cars parking in the private spaces may need to cross the lanes.
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Additional detail about the Washington Canoe Club

Page 50 The Washington Canoe Club, **which currently has approximately 200 memberships**, organizes canoe races **and offers wounded veteran and youth programs**. Key Bridge Boathouse conducts guided tours in the area.

Corrections to acronym callouts

Page 92 “National **Capital** Planning Commission”

Page 97: “NCPC National Capital **Park-and** Planning Commission”

APPENDIX F: ASSESSMENT OF EFFECTS

Georgetown Nonmotorized Boathouse Zone Development Plan and Environmental Assessment

*Rock Creek Park
Chesapeake & Ohio Canal National Historical Park*

***Final Assessment of Effects
Under Section 106, National Historic Preservation Act
of 1966 (54 U.S.C. 306108)***

September 2016

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INTRODUCTION

PROJECT BACKGROUND

The National Park Service (NPS) proposes to implement a nonmotorized boathouse zone (NMBZ) located along the District of Columbia side of the Potomac River in the Georgetown neighborhood (figure 1). This NMBZ would extend from 34th Street, NW, at the western edge of Georgetown Waterfront Park to approximately a quarter of a mile upriver from Key Bridge in the District of Columbia. The NMBZ would encompass both public and private lands, including portions of the Chesapeake and Ohio Canal National Historical Park (C&O Canal NHP) and Georgetown Waterfront Park, part of Rock Creek Park, and several private parcels (the Potomac Boat Club, three private residences, and a small parcel accessible from the shoreline only). There is a strong interest in nonmotorized boating in Washington, DC. Previous studies have demonstrated a steadily increasing demand for nonmotorized boating, including rowing, paddling, and standup paddle boarding. The purpose of this project is to establish a Potomac River recreation zone that more fully supports nonmotorized 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 C&O Canal NHP and Rock Creek Park.

Substantial boating activity occurs on the Potomac River offshore from the NMBZ, where favorable currents and winds combine to create ideal flat water conditions. The flat water upstream of Key Bridge and the natural shoreline that provides a safe exit from the water attracts large numbers of both paddlers and rowers who make heavy use of the Potomac River in this area (approximately 1,500 boaters during the busy spring season). Multiple crew teams practice in the area daily during the rowing season. In addition, several rowing regattas are conducted each year, involving both high school and collegiate racing teams (Louis Berger 2013). Currently, public access points for nonmotorized boating and paddle sports (canoeing, kayaking, rowing, and paddle boarding) are limited, and capacity at current boathouse facilities and related amenities (boat storage, concessions, access facilities, boat rentals, beach, and docks) along the Georgetown waterfront are insufficient. Many hikers, walkers, cyclists, and commuters use the CCT through Water Street, NW, in the NMBZ (Louis Berger 2013). 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 recreation zone. Conflicts between CCT users and nonmotorized boat use are most prevalent during boating events when the area along Water Street, NW, is used as a staging area for regattas (Louis Berger 2013).

PROJECT LOCATION

The NMBZ was established as part of the Master Plan for Georgetown Waterfront Park and C&O Canal NHP (Georgetown Sector) approved and adopted in 1987. The NMBZ is bounded on the south by the Potomac River shoreline and includes a segment of Rock Creek Park between the Potomac Aqueduct Bridge Abutment and Pier (Alexandria Aqueduct) and Georgetown Waterfront Park and a segment of the C&O Canal NHP upstream of the Alexandria Aqueduct (figure 1). The entire project area is located within the boundary of the Georgetown Historic District, which is listed in the National Register of Historic Places (NRHP). The eastern, or downriver, boundary of the NMBZ is at 34th Street, NW. The western, or upriver, boundary of the NMBZ is approximately 1,100 feet upstream of Key Bridge. The northern boundary of the NMBZ is Water Street, NW, east of the Alexandria Aqueduct, and the CCT right-of-way, west of the Alexandria Aqueduct. The western limit reflects an NPS policy to preserve the natural appearance of the Potomac Palisades (Louis Berger 2013).



Figure 1. Project Site

PURPOSE

The purpose of this report is to provide an assessment of the potential effects of the proposed alternatives for the NMBZ on cultural resources. Following Section 106 of the National Historic Preservation Act of 1966 (54 United States Code [U.S.C.] 306108) as outlined in the federal regulations providing for the Protection of Historic Properties (36 Code of Federal Regulations [CFR] Part 800), this report first identifies cultural resources within the project's area of potential effects (APE). For the purposes of this assessment, a property is considered historic if it is listed or is eligible for listing in the NRHP, the nation's official list of cultural resources that are federally recognized as worthy of preservation. Following the identification of historic properties, this report applies the Criteria of Adverse Effects as provided in 36 CFR 800.5 to determine if the proposed undertaking may alter, directly or indirectly, any characteristics of a historic property in a manner that would diminish its integrity. The information contained in this report has been incorporated into the environmental assessment (EA) for the NMBZ Development Plan. This report also will be submitted to the District of Columbia Historic Preservation Officer (DCHPO) in coordination with the preparation of the EA. It will be used as a basis for consultation between the agencies concerning the possible effects of the proposed undertaking on cultural resources.

SUMMARY OF ALTERNATIVES

Two alternatives were considered—a no action alternative and an action alternative that includes several options for development and addresses the need for nonmotorized boating facilities within the NMBZ along the Potomac River in Georgetown.

ALTERNATIVE 1: NO ACTION ALTERNATIVE

Under the no action alternative, no new nonmotorized boathouse facilities would be constructed, and capacity for nonmotorized boating and recreation on the Potomac River in Georgetown would remain the same, with most rowers, including universities, high schools, and individual rowers or rowing groups using Thompson Boat Center. Other rowers would continue to use the private Potomac Boat Club. The Washington Canoe Club would remain in operation, serving paddlers who are members of the club, and negotiations concerning the use and renovation of the building in which the canoe club is housed would continue. The concession currently known as Key Bridge Boats also would continue in its current configuration, providing public rentals of kayaks, canoes, and paddleboards. The site east of the Key Bridge and the space immediately under the bridge would remain unimproved and would continue to serve as a storage yard for the city.

In addition, the CCT would continue to terminate at the Alexandria Aqueduct, and the transition from the trail to Water Street and the Georgetown Waterfront Park would remain confusing. This confusing transition makes it dangerous for cyclists, motorists, and pedestrians along Water Street. Although the C&O Canal NHP installed a gate at the aqueduct, motorists still try to push through the gates because their GPS units cannot tell whether they are on the Whitehurst Freeway overhead and about to intersect with Canal Road and M Street or on Water Street at the entrance to the park, and wayfinding along Water Street is inadequate to provide direction to these wayward motorists.

ALTERNATIVE 2: NONMOTORIZED BOATHOUSE ZONE

The action alternative is based on preliminary design and focuses on the appropriate buildable area for each zone and how that area could be used to provide access to favorable flat water conditions for nonmotorized boating and improve on-shore amenities. The action alternative allows phased development of nonmotorized boating facilities for both rowing programs and recreational paddlers, while providing planning flexibility in future size, placement, and design of these facilities.

The zone has been divided into five sites with sites A–C west of the Alexandria Aqueduct in the C&O Canal NHP and sites D and E east of the Alexandria Aqueduct and the Potomac Boat Club. Sites D and E sit on land administered by Rock Creek Park (figure 2). Overall, the implementation of this alternative would be phased, most likely starting with sites D and E. A summary of the proposed improvements to sites A–E is provided below, with more details provided in table 1 and an illustration of the massing for the facilities provided in figures 3 through 6.

- **Site A:** Site A would include shoreline improvements, a sloped shoreline launch for canoes/kayaks/paddleboards, a picnic area that could include tables and grills or other amenities, and a trail/boardwalk through the site. Based on future need, site development may include the option of constructing a small, single-story boat storage area with a footprint of no greater than approximately 2,700 SF.
- **Site B:** The Washington Canoe Club and its facilities are located within site B. The only actions proposed on this site would include general site restoration, rehabilitation of the structure, reconfiguring or removing the fenced yard, altering the authorized access driveway so that it services the facility, and providing controlled public access across the Washington Canoe Club apron to site A.
- **Site C:** Site C would provide a canoe/kayak rental/storage facility that could be one single structure or multiple smaller structures. The total facility footprint would be no greater than approximately 6,000 SF with no more than two stories and a maximum height of 35 feet. The size of the adjoining public apron and dock would be commensurate with the ultimate size of the new facility or facilities, but not longer than 300 feet.
- **Site D:** The primary configuration of the boathouse facility at site D assumes that the privately owned townhouses would remain in private ownership and be excluded from the nonmotorized boathouse zone. Therefore site D would include the construction of a smaller boathouse with an approximate footprint of 3,600 square feet (possibly up to 4,200 square feet, although a boathouse that size would restrict boat maneuverability in the plaza), a dock up to 150 feet long, a plaza, and ground-level boat storage. Both the dock and plaza areas would be accessible to the public except during permitted events (i.e., regattas and team practices). The proposed boathouse could be designed for a maximum height of 45 feet or up to three stories. If the townhouses were to become available for inclusion in the project at some point in the future, options for a larger boathouse (7,200 SF) on that site, with the public plaza shifted to the west, could be considered.
- **Site E:** Site E would include construction of a large boathouse with a footprint of up to approximately 13,800 SF, with a dock up to 300 feet long, ground-level storage, and plaza areas. Both the dock and plaza areas would have public access except during permitted events (i.e., regattas and team practices). Treatments and configurations for Water Street NW and links between the CCT, the street, and Georgetown Waterfront Park would include drop-off and temporary storage areas for car-top users to leave their boats while they park on Water Street NW or in a parking garage. The site would also include an apron with vehicular access from Water Street NW at 34th Street NW and a public plaza/apron with dock access at the west end of the boathouse.

TABLE 1. DETAILS OF ALTERNATIVE 2

Feature	Alternative 2: Nonmotorized Boathouse Zone
Rowing program support	<ul style="list-style-type: none"> • Site C: Up to ~6,000 SF second floor • Site D: Up to ~3,600 SF to ~4,200 SF second floor • Site D: Up to ~3,600 SF to ~4,200 SF third floor • Site E: Up to ~13,800 SF second floor • Site E: Up to ~13,800 SF third floor
User Amenities	<ul style="list-style-type: none"> • Self-serve lockers for car-top drop-off on Water Street NW across from Potomac Boat Club (approximately 36 lockers) • Potential rental racks at site A (approximately 42 racks) • Soft entry kayak launch (walk-in or rental only) (site A) • Dock entry kayak launch (site C) • Self-serve storage (site C) • Car-top launch drop-off and lockers at Water Street NW • Public restrooms (site C) • Picnic area (sites A and C) • Trail/boardwalk (site A) • Separated multiuse trail on Water Street NW • Restricted access driveway for service and emergency vehicles (sites A, B and C) • Seasonal outdoor boat storage • Public plaza/deck
Shoreline	<ul style="list-style-type: none"> • Shoreline improvements (i.e., remove riprap, debris, and near-shore sediments; create a natural shoreline profile; restore alluvial bench vegetation; improve near-shore habitat; and stabilize natural beach entry kayak launch [site A, and possibly site C]) • Minor shoreline fill and limited bulkhead construction and piles to accommodate boathouse construction (sites E, D, and possibly C) • Possible excavation of first floor by 2 to 3 feet at sites D and E below current grade to reduce height above mean low water level and ramp length
Alexandria Aqueduct	<ul style="list-style-type: none"> • Boat storage under archway (approximately 20 racks)
Vehicular Access C&O Canal NHP	<ul style="list-style-type: none"> • Authorized vehicles only beyond the Alexandria Aqueduct via NPS driveway (10 feet wide) • Gate at the Alexandria Aqueduct
Vehicular Access Water Street	<ul style="list-style-type: none"> • Street section: <ul style="list-style-type: none"> – Two travel lanes – 26–36 metered parallel parking spaces (depending on curb cuts and final design) – 30-foot radius cul-de-sac • Public plaza/apron with limited loading on site C • Public plaza/apron with designated loading zone on site D between existing townhouses and proposed boathouse • Public plaza/apron with designated loading zone at 34th Street NW • Short-term drop-off storage for car-top paddle craft for use while visitors park or retrieve their vehicles (includes potential for some of this storage to be longer term) • Traffic calming pavement design similar to Georgetown Waterfront Park materials to minimize conflicts between uses within congested loading zones
Multiuse Trail	<ul style="list-style-type: none"> • CCT transitions to 10-foot wide east of the Alexandria Aqueduct and continues on south side of Water Street NW between Whitehurst Freeway columns, connecting to Georgetown Waterfront Park • Shared bike lanes in Water Street NW with transition between trail and cul-de-sac
Parking	<ul style="list-style-type: none"> • Parking required for boathouses may be provided on-street or in local garages; 26–36 on-street parking spaces on Water Street NW provided, with short-term drop-off parking in the cul-de-sac

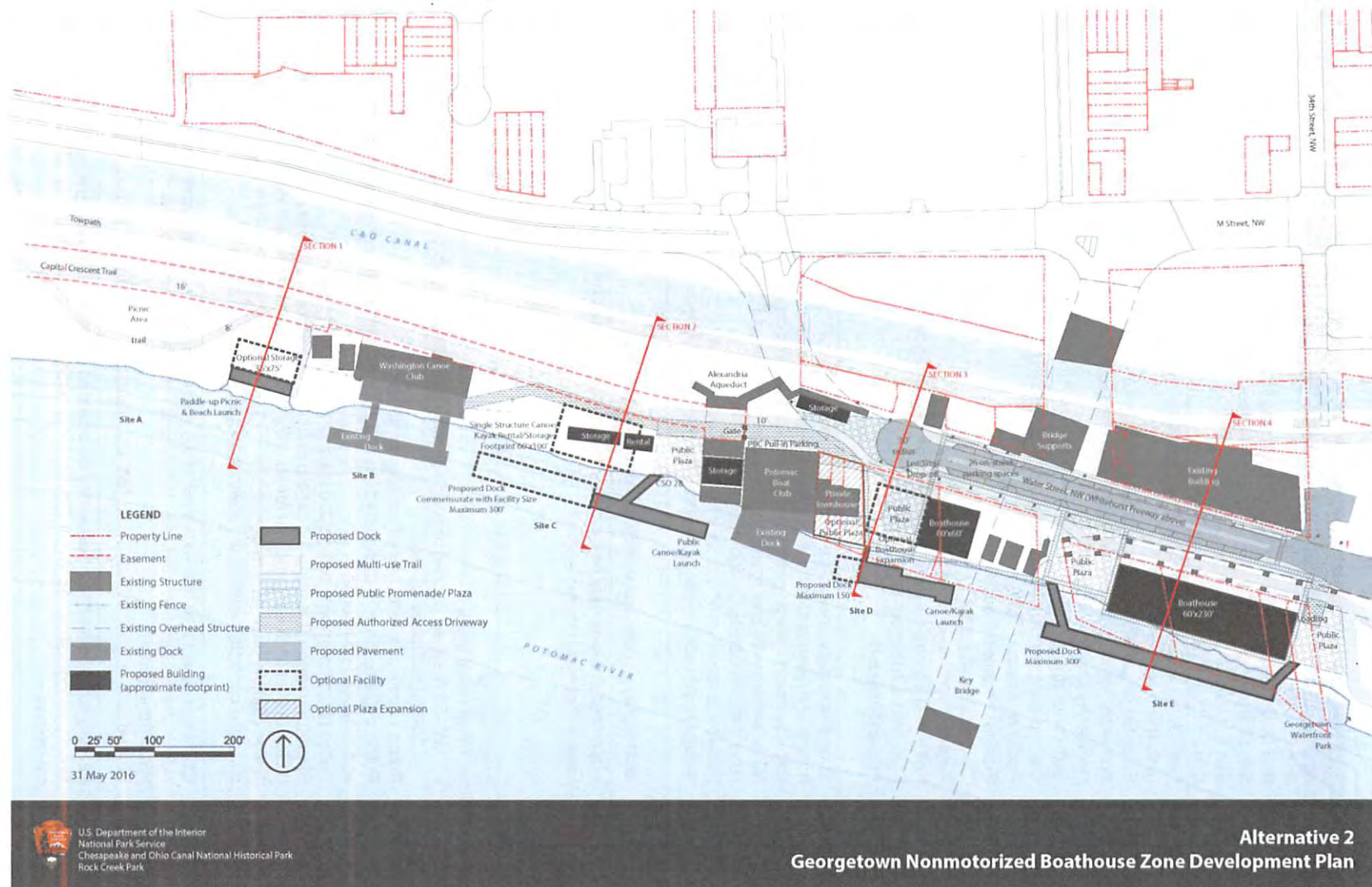


Figure 2. Alternative 2

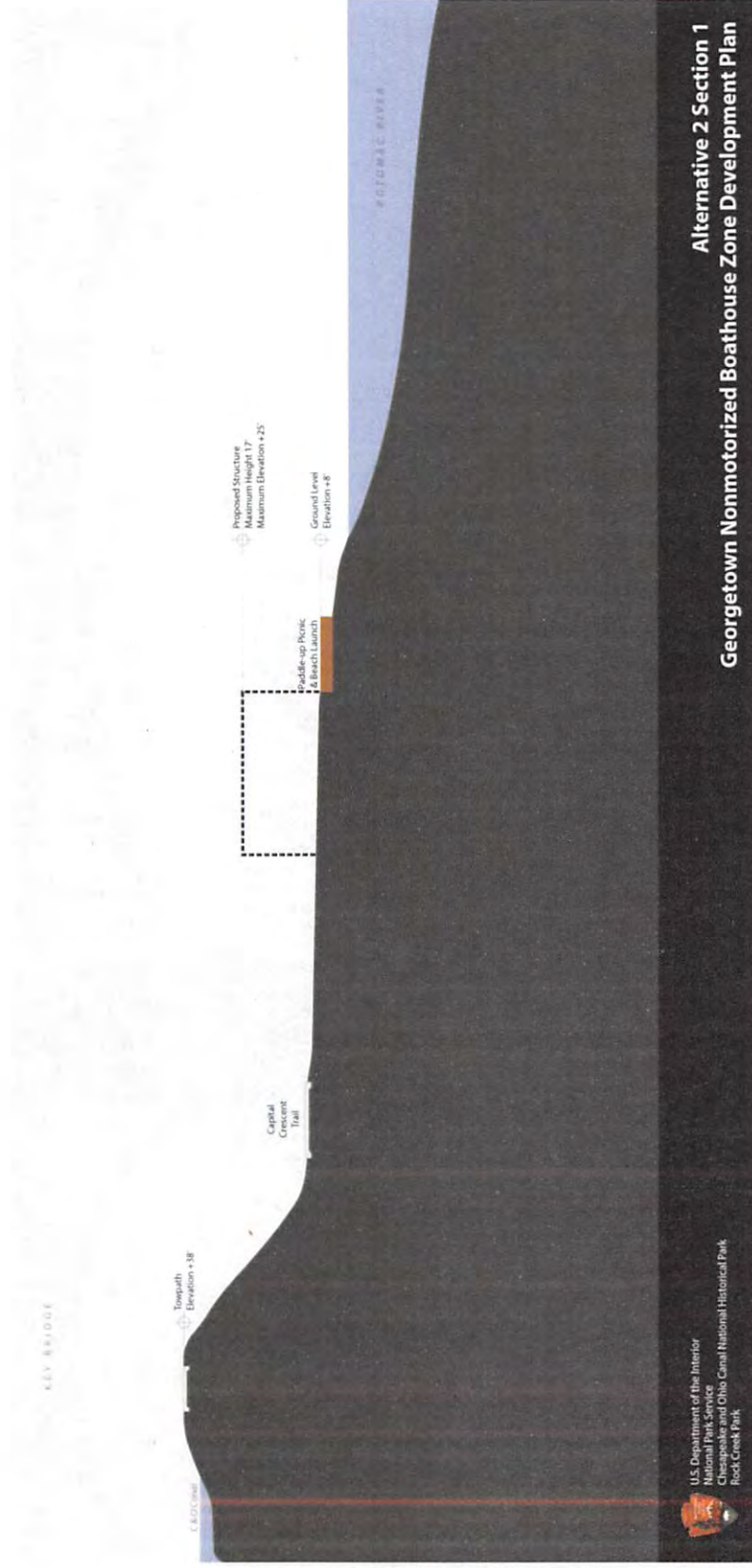


Figure 3. Cross Section at Site A

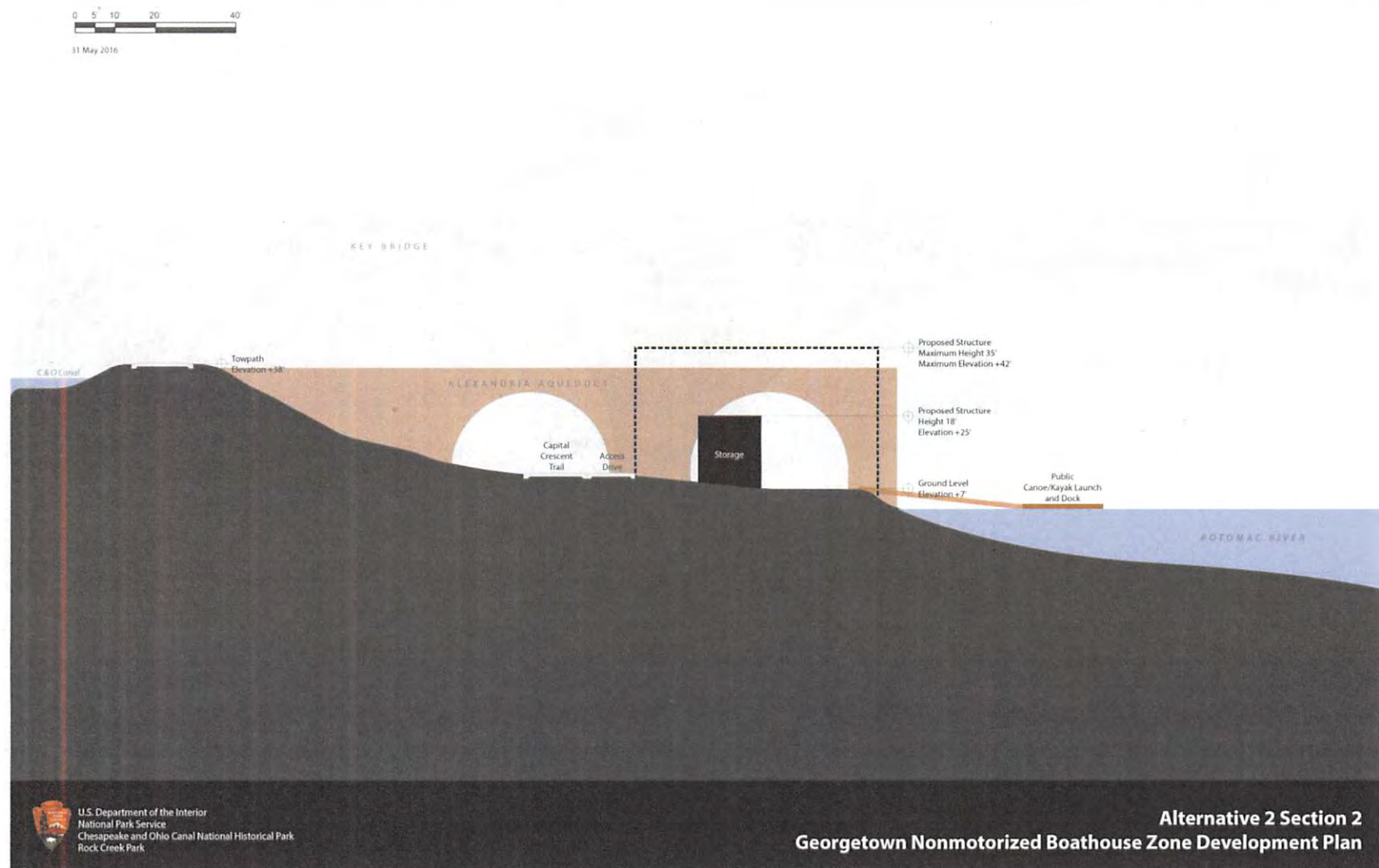


Figure 4. Cross Section at Site C

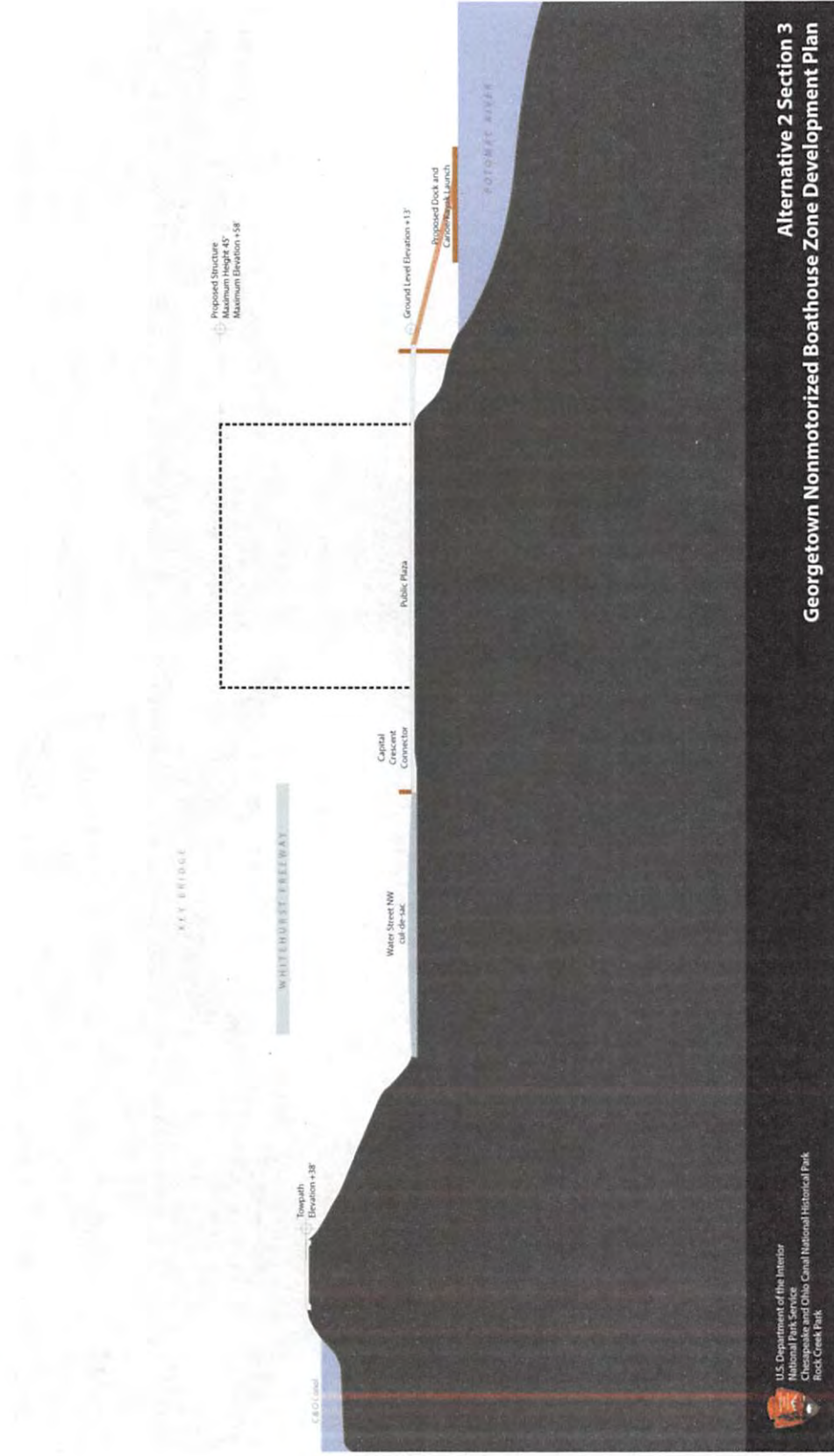


Figure 5. Cross Section at Site D

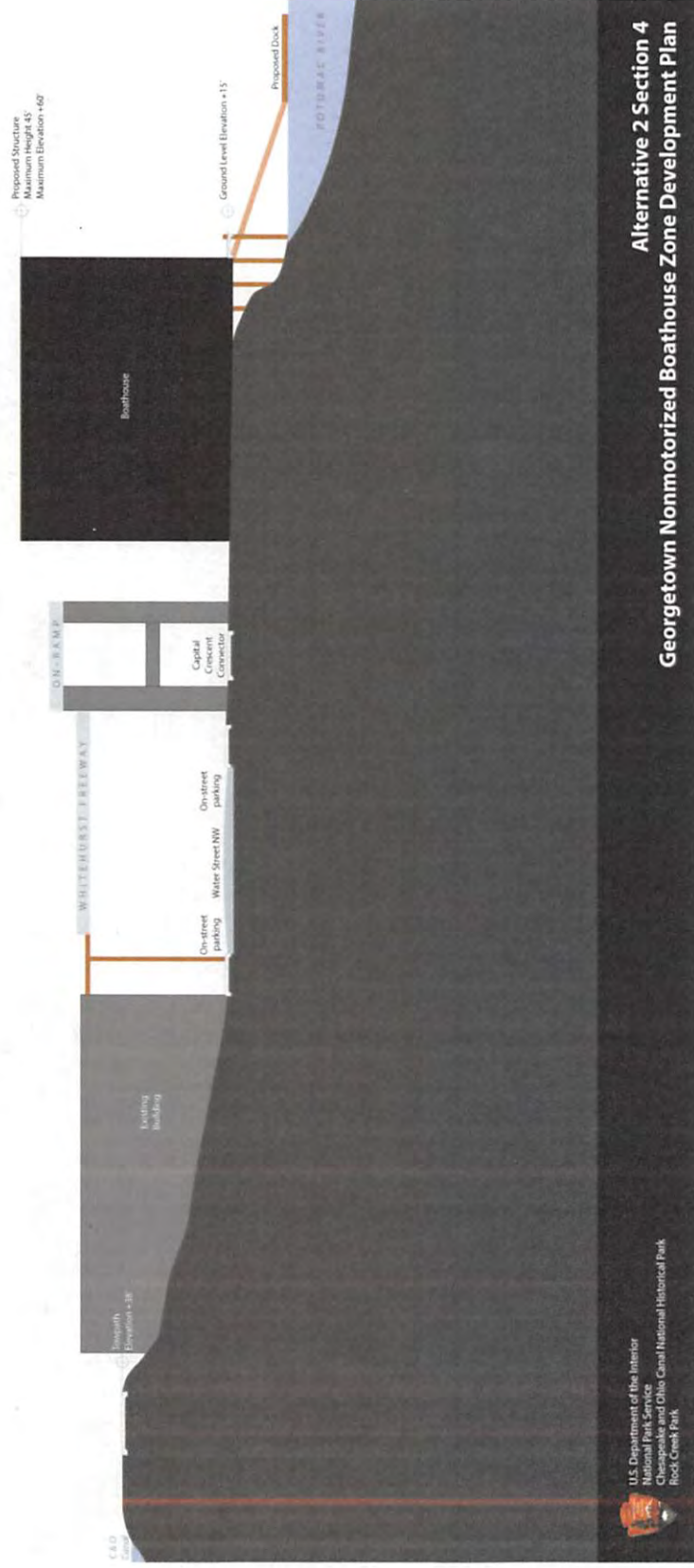


Figure 6. Cross Section at Site

IDENTIFICATION OF CULTURAL RESOURCES

AREAS OF POTENTIAL EFFECT

According to the Section 106 regulations (36 CFR 800), an APE is defined as the geographic area or areas in which an undertaking directly or indirectly may cause alterations in the character or use of historic resources or properties, if such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

Separate APEs for direct and indirect effects have been delineated for the project as depicted in figure 7. The APE for direct effects (shown as the primary APE in figure 7) encompasses the proposed project area, extending from 34th Street, NW, at the western edge of Georgetown Waterfront Park to approximately a quarter of a mile upriver from Key Bridge in the District of Columbia. The APE for indirect effects (shown as the secondary APE on figure 5) considers potential visual impacts on surrounding historic properties adjacent to the undertaking. The western, northern, and eastern boundaries of the APE for indirect effects north of the Potomac River coincide with the Georgetown Historic District boundary. The APE for indirect effects extends east to 27th Street at K Street then follows Virginia Avenue, SW, to the south. The boundary proceeds south behind the Watergate Complex and the John F. Kennedy Center for the Performing Arts. The southern edge of the APE for indirect effects follows the Roosevelt Bridge and the southern boundary of the George Washington Memorial Parkway (GWMP).

HISTORIC CONTEXT

Georgetown was laid out in 1751 and soon flourished as a tobacco port town and shipping center with a profitable European and Caribbean trade. In 1789, the same year that Georgetown lobbied Congress to locate the federal city here, the Maryland Assembly incorporated Georgetown as an independent town. In 1791, Georgetown became part of the 10-square-mile federal city. Over the course of the next decade, Georgetown prospered. Local fortunes were made in shipping and real estate, and development of the town began to spread beyond the banks of the river. While hotels, taverns, banks, and other commercial buildings were clustered along M Street and the waterfront area, large mansions and smaller, speculative housing began to be constructed above the harbor. By 1814, Georgetown had evolved from a small tobacco inspection station clustered around the harbor to a fully envisioned town, platted virtually in its entirety from the water to north of R Street (DC SHPO 2003).

In the first decades of the 19th century, as the formerly prosperous tobacco trade began to flounder and Georgetown's port began to silt up (exacerbated by the construction of Long Bridge in 1808), and with the competition from the ports of Baltimore and Alexandria for Georgetown's market, the Georgetown economy faced change (DC SHPO 2003).

The construction of the C&O Canal, designed in 1828 to carry raw materials east and finished goods west, helped Georgetown weather this change and was the impetus that transformed it from a tobacco port to a more diversified industrial (low-level processing) and commercial center. While coal shipping dominated the new economy, the processing and shipping of wheat, corn, stone, lumber, and cordwood supplemented the industry. The 30-foot drop from the canal to the Potomac River also provided ample water power for the operation of mills, including flour and paper mills and metal foundries (DC SHPO 2003).

The Baltimore and Ohio (B&O) Railroad Company was also created in 1828 to provide direct transportation for Baltimore to the Ohio River. The Georgetown Branch was constructed beginning in 1892. Georgetown was an attractive location for the branch because of the abundant coal brought down from the river by the C&O Canal. The railroad company went into receivership in the late 1890s and construction on the line from Chevy Chase to Georgetown was not completed until 1910 (Coalition for the Capital Crescent Trail 2016).

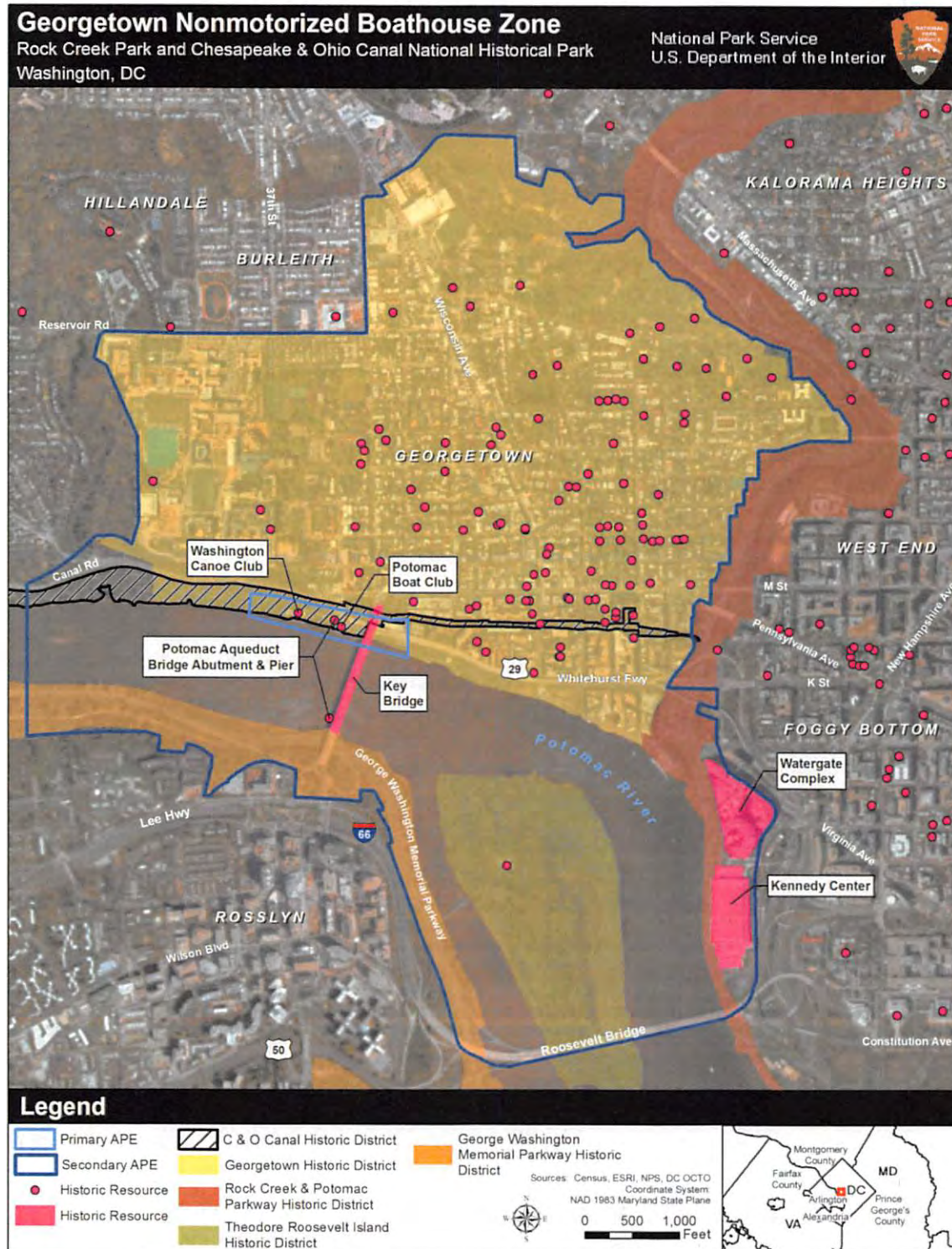


Figure 7. Area of Potential Effect

A flood in 1889 caused enough damage to the C&O Canal to bring about its downfall. The canal had been Georgetown's chief supplier of the wheat, coal, lumber, and other raw materials that kept the waterfront viable. Not only did Georgetown lose its supply line, but the water power to the five flour mills and the paper mill located along the canal was cut off. The well-being of Georgetown's cooperage firms was closely tied to the fortunes of the flour mills that they supplied (NPS 2015).

The most significant changes in the economy of the waterfront took place between 1889, when the flood occurred, and 1915. Although rapid industrialization was taking place in the rest of America during the 1890s, the economy of Georgetown was still based on a bygone era of mule-drawn canal boats, water power, and schooners. Labor-intensive ice-manufacturing businesses moved into old flour mills along the waterfront, including in the area of the proposed boathouse zone. Georgetown's long-awaited rail connection came in 1910. Taking advantage of the new rail connection, companies such as the Cranford Paving Company, Brennan Construction Company, Corson and Gruman, Smoot Sand and Gravel Corporation, and the Columbia Granite and Dredging Corporation covered the shoreline with piles of sand, stone, and other construction materials. These companies filled the needs of the automobile age by providing road-building materials. The waterfront area became industrial (NPS 2015).

The rise of the City Beautiful movement and the desire to commemorate the centennial of the establishment of Washington as the seat of government transformed the Georgetown waterfront. In the spring of 1901, the Senate Park Commission was created to develop and improve the entire park system of the District of Columbia. The eventual plan for the system of parks, the McMillan Plan, included the Rock Creek and Potomac Parkway to serve as a link between Rock Creek Park and the National Mall. After studying the locally prepared schematic designs, the professionally acclaimed 1901–1902 Senate Park Commission specified the Rock Creek and Potomac Parkway as the entrance to the proposed comprehensive park system for the nation's capital. In 1913, Congress authorized legislation for the Rock Creek and Potomac Parkway, the first parkway in the metropolitan region and one of the earliest in the country. After a long period of land acquisition, planning, and design, sections of the new parkway began to open in the 1930s (DC SHPO 2003).

While the riverfront was being developed as a parkway south of the Key Bridge, recreational facilities such as the Potomac Boat Club and Washington Canoe Club were being developed along the waterfront around the Potomac Aqueduct (DC SHPO 2003). The area of the proposed boathouse zone along the Georgetown waterfront has historically been the site of recreational boathouses and industrial uses with less vegetation and pastoral setting than exists currently. The Potomac Boat Club, founded in 1859, constructed a boathouse along the Potomac, west of the Alexandria Aqueduct in 1908. The new boathouse was constructed using the form of a second generation boathouse. Unlike first generation boathouses, which were utilitarian sheds that stored shells, second generation boathouses are larger, more elaborate two-story structures that accommodate boat storage on the first floor and social functions on the second (NPS 1990a). The Washington Canoe Club was the first clubhouse built by the newly formed organization in 1904. The club was constructed in two phases with salvaged timbers and wood from burned out barns according to club tradition. The three-story shingle style building, designed by George P. Hales, follows the general form of a second generation boathouse, with boat storage, kitchen, and grill room on the first floor and social spaces on the second floor. By 1930, a one-story boat shed was added to the east. Sometime after 1971, a second floor was constructed on the boat shed addition (NPS 1990b). Both buildings are all that remains of the vibrant history of recreational water sports on the Potomac.

In the 1930s, concern was growing over the state of the natural and historic resources in Georgetown. The Capper-Crampton Act of 1930 established a federal goal of protecting the shorelines of the Potomac River from Fort Washington, Maryland, to Great Falls, Maryland, and identified the Georgetown waterfront as an important element of that shoreline warranting federal protection. The District of Columbia transferred 10 acres of Georgetown waterfront property to the National Park Service for park purposes, and Georgetown Waterfront Park boundary was formally established in 1984 (Louis Berger 2013).

In 1938, the Department of the Interior acquired the C&O Canal as an historic site, and the National Park Service began restoration of the 22-mile stretch between Georgetown and Seneca. In 1949, when the construction of the Whitehurst Freeway destroyed large numbers of waterfront and canal-related resources, citizens protested and Congress responded by passing the Old Georgetown Act in 1950. This act set the boundaries for the "Old Georgetown" district, which was designated a National Historic Landmark and automatically listed in the NRHP in 1967 (DC SHPO 2003).

The area known as Foggy Bottom became the focus of an urban renewal project in the 1940s that combined indiscriminate clearance of blighted areas with rehabilitation of historic row houses. Construction of the Potomac Plaza residential complex and Theodore Roosevelt Bridge and interstate highways in the area spurred further development. In the late 1950s, Foggy Bottom was chosen as the site for the new national cultural center, named the John F. Kennedy Center less than two weeks after Kennedy's assassination. The new building was completed in 1971 (Robinson & Associates 2012).

IDENTIFICATION OF HISTORIC DISTRICTS, STRUCTURES, AND SITES WITHIN THE AREA OF POTENTIAL EFFECT

HISTORIC DISTRICTS

C&O Canal Historic District

The upstream end of the NMBZ from the Alexandria Aqueduct west is part of the C&O Canal NHP. The canal and its levee run parallel to the river behind the NMBZ on the west side of CCT, rising about 25 feet in elevation above the trail. The C&O Canal is one of the most intact and impressive remnants of the American canal-building era, and its historical significance is the basis for creating the C&O Canal NHP. C&O Canal is listed under Criteria A and C and is historically significant primarily because it embodies 19th century engineering and architectural technology. The canal operated from the late 1820s to 1924 as a route for transporting coal, lumber, and agricultural products from western Maryland to the port of Georgetown and to the navigable lower reaches of the Potomac River.

The Potomac River and the C&O Canal are the primary organizing features of the current landscape of the NMBZ. The river terrace and C&O Canal levee provide spatial organization oriented toward the river. In addition, the presence of the Alexandria Aqueduct establishes a portal that divides the NMBZ into distinct character areas (figures 8 and 9). East of the Alexandria Aqueduct along Water Street, NW, the urban character is marked by the presence of buildings adjacent to the river that block views of the river and minimize access, which is similar to the historic character of this area during the period of significance. Several open lots and the open character of Key Bridge Boathouse are exceptions that are more consistent with the open character of Georgetown Waterfront Park located to the east. Whitehurst Freeway and Key Bridge provide a strong spatial definition of the site by providing a "ceiling." West of the Alexandria Aqueduct, the site character is currently more open; the Washington Canoe Club is the only structure and the area has significantly more vegetation. Views to the river are open, and a strong boundary is created by the C&O Canal levee. Historically, during the operation of the canal, and in the early 20th century, there were several recreational boathouses in the vicinity, surrounded by industrial zones with limited vegetation immediately along the shore. Currently, the the spatial organization of the site is mimicked along the C&O Canal towpath, which crosses below Whitehurst Freeway to establish a "threshold" between city and nature. As discussed previously, the topography of the site is dominated by the C&O Canal levee and flat riverside terraces formed by construction fill. The topography is a significant component of the site's spatial organization.

In addition, as noted above, the vegetation at the site is a strong contributor to its present character. Historic photographs indicate that the forested condition is relatively recent. The forest cover obscures the relationship of the C&O Canal to the Potomac River. The vegetation provides a continuum with the

forested embankment of the C&O Canal that distinguishes the areas east and west of the Alexandria Aqueduct and reinforces the spatial organization of the NMBZ.

The circulation patterns in the NMBZ are predominantly water-based. The Washington Canoe Club, Potomac Boat Club, and Jack's Boathouse provide access to the Potomac River from within the NMBZ.



Source: Louis Berger 2013

Figure 8. Pastoral Character West of the Alexandria Aqueduct



Source: Louis Berger 2013

Figure 9. Urban Character East of the Alexandria Aqueduct

In addition, Thompson Boat Center, located downstream from the zone, is a significant launching point for paddle craft using the river offshore from the NMBZ. The Washington Canoe Club and Potomac Boat Club are private clubs that offer access only to their members. Jack's Boathouse and Thompson Boat Center offer access to the public. The other significant circulation feature is the CCT, which is a major regional trail and provides access for commuters and recreationists. CCT is 12 feet wide but occupies a 30- to 40-foot-wide easement that encompasses the original B&O railroad embankment on which it is built. The trail is linked to Water Street, NW, which is the main circulation spine east of the Alexandria Aqueduct. Water Street, NW, lacks delineated lanes and conveys the impression of a parking lot as much as a street.

The Potomac River is the primary feature of the NMBZ. Within the NMBZ, views and vantage points that are significant as character defining features of the region as a whole are those that establish the relationship of the various cultural features to the natural setting, to the history of the C&O Canal, and to one another. These views and vantage points include the forested slope of the C&O Canal levee and to a lesser extent the forested edge of the NMBZ, which establishes the natural character of the Potomac River above Georgetown. The view through the Alexandria Aqueduct from both directions is important in that it marks a symbolic transition from city to nature in the form of a literal threshold marked by the arch of the aqueduct.

No small-scale features of significance are located in the NMBZ.

The entire length of the canal is listed on the NRHP because of its historical significance for architecture, engineering, commerce, transportation, military history, and conservation (NPS 1971).

Georgetown Historic District

Georgetown was founded by an act of the Maryland Assembly in 1751 and became part of the District of Columbia upon its establishment in 1791, although it remained a separate jurisdictional entity within the District until 1871. The Georgetown Historic District is a remarkably intact example of a historic port town and encompasses the area originally laid out in 1751. Its narrow grid streets contrast from the wide

streets of L'Enfant's Plan, and its collection of buildings and structures are among the city's oldest, demonstrating a rich variety of residential, commercial, institutional, and industrial examples. The historic district was first established by the Old Georgetown Act in 1950 and listed in the DC Inventory of Historic Sites in 1964. In 1967, the Georgetown Historic District was designated a National Historic Landmark and was listed in the NRHP under Criteria A and C (DC SHPO 2003). The former B&O Railroad, now the CCT, is within the Georgetown Historic District boundary. The Waterfront Park area of the historic district may also contain unsurveyed sites associated with waterfront industrial warehouses that were present at that location around 1888 when the B&O Railroad was constructed.

George Washington Memorial Parkway

The GWMP was listed in the NRHP in 1995 and comprises 7,146 acres and extends 38.3 miles along the Potomac River. An updated nomination is being prepared (NPS 2016-in draft). The resource in Virginia is composed of two sections, the southern section that extends from Arlington Memorial Bridge Gateway to Mount Vernon and was opened in 1932. The northern section runs 9.7 miles from Memorial Bridge to the Capital Beltway/Interstate 495 in Virginia and opened in 1965. The parkway has a period of significance from 1930 to 1966. Under Criterion B, the GWMP is significant for the Potomac River corridor's association with George Washington. Under Criterion C, the parkway is significant for landscape architecture designed by Frederick Law Olmsted, Jr., Charles Eliot, and Gilmore D. Clark (NPS 1995a). Built with the twin purposes of conserving Potomac Gorge and connecting historic sites associated with George Washington, the views from the parkway were designed by landscape architects to capitalize on both the scenic value of the river valley and the monumental character of the nation's capital. Historic vistas, such as those toward Georgetown, were preserved by planners and engineers by managing vegetation and small-scale features along the road and framing the various vistas with bridges, natural systems, and circulation features. These views have been altered over time as vegetation has grown along the parkway but remain a significant and character-defining feature of the GWMP (Donaldson 2009). A 2009 cultural landscapes inventory of GWMP-North identifies contributing landscape characteristics that include natural systems and features, spatial organization, land use, topography, vegetation, circulation, buildings and structures, views and vistas, small-scale features, and archeological sites (Donaldson 2009). The draft nomination also states the GWMP is now eligible for inclusion in the NHRP under Criterion A (Planning, Conservation, and Recreation; Recreation and the NPS Mission 66 Program; Transportation and Engineering; Memorialization and Commemoration in Twentieth-Century America), Criterion B (George Washington and the Patowmack Canal), and under Criterion C for Transportation and Engineering, in addition significance noted under the previous nomination.

Theodore Roosevelt Island

Theodore Roosevelt Island is an 88.5-acre island that sits in the Potomac River near the Key Bridge. Although the island is accessed in Virginia, it is part of Washington, DC. The Theodore Roosevelt Memorial Association bought the island in October 1931; it was transferred to the federal government in March 1932 to serve as a national memorial to President Theodore Roosevelt. The island honors the 26th president primarily for his role as a leader in conservation, exhibited in the natural features of the island itself, including its lands, waters, flora, and fauna. In 1967, a large open-air architectural monument commemorating Roosevelt was completed on the northern end of the island. Roosevelt Island, administratively part of the GWMP, was listed in the NRHP in 1967 under Criteria A, C, and D, and its nomination was updated in 1999 (NPS 1999).

Rock Creek and Potomac Parkway Historic District

The property known as the Rock Creek and Potomac Parkway occupies the gorge and rim of the lower Rock Creek Valley (the section of the valley south of the National Zoological Park) and a stretch of land along the Potomac riverfront. The linear park is approximately 180 acres; it varies in width from several

dozen feet at its southern end to more than 500 feet near the northern boundary. The riverfront incorporates a grassy embankment, and the valley contains rock outcroppings, a variety of hardwood groves, a myriad of shrubs and dense understory, invasive vines, and a few grassy swards with specimen trees. The historic district incorporates a variety of extant 19th-century industrial structures, the earliest of which dates to 1828. Bridges are the most prominent extant cultural resources. Several stone retaining walls exist near bridge abutments, steep embankments, and along the creek. The dominating feature of the park is the Rock Creek and Potomac Parkway. The historic district is a DC landmark and was listed in the NRHP in 2005. The Rock Creek and Potomac Parkway meets Criteria A and C in the areas of community planning and development, engineering, recreation, and landscape architecture. The property's period of significance, 1828–1951, is defined by the beginning of construction of the C&O Canal and the erection of The Arts of Peace sculpture groups (NPS 2005a).

HISTORIC BUILDINGS, STRUCTURES, AND SITES

Potomac Aqueduct Bridge Abutment and Pier (Alexandria Aqueduct)

The Georgetown abutment and stone pier, located within the NMBZ, are remnants of the C&O Canal aqueduct over the Potomac built between 1833 and 1843 and designed by Maj. William Turnbull, US Topographical Engineers. The aqueduct bridge was a major early-19th-century engineering achievement involving construction of piers to bedrock 35 feet under the waterline. During the Civil War, the structure was drained and used as a highway bridge. The canal was reconstructed with a wooden Howe truss in 1868 with a highway bridge above. Iron trusses were added in 1888, and the canal was converted to a bridge. In 1933, the superstructure was removed. The piers were cut down in 1962. The remnants of the aqueduct received DC landmark designation on January 23, 1973 (DC SHPO 2009).

Washington Canoe Club

The Washington Canoe Club is located on a narrow strip of land between the bank of the Potomac River and the C&O Canal at the western end of K Street just west of the Alexandria Aqueduct. The CCT runs immediately behind the building. The club was constructed in 1904 and remains an excellent example of shingle style architecture characterized by octagonal towers, cross-gabled roof with louvered cupola, a central pavilion with flanking balconies, shaped verge boards in the prominent gable end, and shingle cladding. The building received DC landmark designation on January 23, 1973, and was listed in the NRHP in 1991 (NPS 1990b; DC SHPO 2009).

Potomac Boat Club

The Potomac Boat Club also is located on the western end of K Street, just east of the Alexandria Aqueduct. The boat house, which exhibits Craftsman style influences, was constructed in 1908 as the second structure for the Potomac Boat Club. The two-story frame boat house displays typical characteristics of its type, including a façade that faces the river, a low-pitch front-gabled roof, a tower, boat ports, large French doors, and shingle cladding. As one of only two remaining early-20th-century boat clubs along the Potomac River in the District of Columbia, the Potomac Boat Club received DC historic landmark designation on January 23, 1973, and was listed in the NRHP in 1991 (NPS 1990a).

Francis Scott Key Bridge

The Francis Scott Key Bridge spans the Potomac River between Georgetown in Washington, DC, and Rosslyn in Arlington County, Virginia. The bridge, which carries US Route 29, has a northern approach at the foot of 35th Street, NW. The Francis Scott Key Bridge is a skillfully designed reinforced concrete arch bridge. Originally constructed to provide automotive, trolley, and pedestrian transit, the bridge has served as an important link between Washington and northern Virginia. Nathan C. Wyeth designed the bridge in 1916, and construction was completed in 1923. The structure is noteworthy for its elegant and simple Classical design. The Classically inspired structure comprises reinforced concrete, with eight arches. Five of the arches span the river, while the other three span land features. The original structure,

designed in 1916 and constructed between 1917–1923, included seven arches. The eighth arch was added in 1938–1939 to span the GWMP in Virginia. The superstructure was altered in 1955 and 1987. The bridge was listed in the NRHP in 1996 under Criterion C in the area of engineering and because it was designed by an important local architect, Nathan C. Wyeth (NPS 1995b).

Watergate Complex

Watergate, a unified complex consisting of six interconnected buildings constructed between 1964 and 1971, is one of the most well-known complexes in Washington, DC, politically and architecturally. Notwithstanding the building's significance for its associations with the 1972 Watergate scandal, the complex embodies exceptional architectural significance as an outstanding and innovative example of the Modern Movement in Washington, DC. The scale and mixed-use program of Watergate required the formation of Washington's first private initiative Planned Unit Development, a new and largely untested idea in urban planning. The complex was listed in the NRHP in 2005 and received DC landmark designation the same year (NPS 2005b).

John F. Kennedy Center for the Performing Arts (Kennedy Center)

Located at 2700 F Street, NW, at the intersection of New Hampshire Avenue, NW, and the Rock Creek and Potomac Parkway, the John F. Kennedy Center for the Performing Arts is situated on a prominent site overlooking the Potomac River at the western edge of the Monumental Core of Washington, DC. The Kennedy Center was constructed between 1964 and 1971 and dedicated in 1971 as a national performing arts center and as a monument to President John F. Kennedy. It is eligible for listing in the NRHP for its national significance related to the life of President John F. Kennedy and for its modern architecture designed by 20th-century master architect Edward Durell Stone (Robinson & Associates 2012).

IDENTIFICATION OF CULTURAL LANDSCAPES IN THE AREA OF POTENTIAL EFFECT

In the indirect APE, the GWMP and adjacent Theodore Roosevelt Island are considered cultural landscapes. The C&O Canal and Rock Creek and Potomac Parkway also have component landscapes that are not within the APE. For the GWMP, a cultural landscape inventory, completed by the National Park Service in 2009, identified contributing landscape characteristics that include natural systems and features, spatial organization, land use, topography, vegetation, circulation, buildings and structures, views and vistas, small-scale features, and archeological sites (Donaldson 2009). The project area is visible from the GWMP from the Francis Scott Key Bridge to North Oak Street. The view west of North Oak Street is obscured by dense vegetation.

IDENTIFICATION OF ARCHEOLOGICAL RESOURCES IN THE AREA OF POTENTIAL EFFECT

Because of a long history of development and occupation of the land in the zone, there was concern there could be archeological resources in the project area that could be affected. A Phase 1A archeological evaluation that included taking soil cores determined a very low likelihood for archeological resources that could be disturbed in most of the project area. There is potential for resources at site A, but the soil cores indicate these resources are at least 6 feet below the surface, and the proposed facilities in this area would not require disturbance to that depth (Louis Berger 2015). The potential for submerged resources was also considered. However, sea level rise in the Potomac has generally taken the form of erosion, not submergence, so the presence of submerged resources is highly unlikely. Other than shipwrecks, no submerged archeological sites are known in the Potomac or Anacostia Rivers (Katz et al. 2015).

ASSESSMENT OF EFFECTS

METHODOLOGY

To assess the potential effects of the proposed “Georgetown Nonmotorized Boathouse Zone Development Plan” on historic properties, this report applies the Criteria of Adverse Effect, as defined in 36 CFR 800.5, to each historic property within the APEs. The Criteria of Adverse Effect states, “An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the property’s location, design, setting, materials, workmanship, feeling, or association.” Additionally, “adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.” Examples of adverse effects include:

- Physical destruction of/or damage to all or part of the property
- Alteration of a property that is not consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Resources (36 CFR 68) and applicable guidelines
- Removal of the property from its historic location
- Change of the character of the property’s use or physical features within the property’s setting that contribute to its historic significance
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features
- Neglect of a property which causes its deterioration
- Transfer, lease, or sale of the property out of federal ownership; control without adequate and legally enforceable restrictions; or conditions to ensure long-term preservation of the property’s historic significance

EFFECTS ON HISTORIC DISTRICTS AND STRUCTURES WITHIN THE AREA OF POTENTIAL EFFECTS

EFFECTS OF THE ALTERNATIVE 1: NO ACTION ALTERNATIVE

Under the Alternative 1, the no action alternative, no new nonmotorized boathouse facilities would be constructed, and capacity for nonmotorized boating on the Potomac River in Georgetown would remain the same. Because no action would be taken, the project would not constitute an undertaking under Section 106.

EFFECTS OF ALTERNATIVE 2

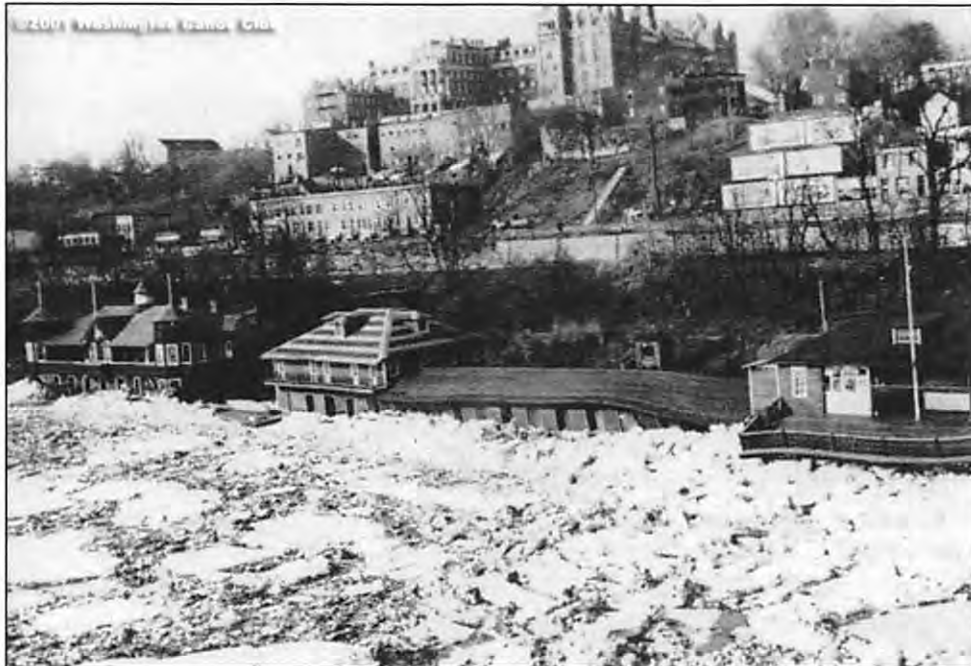
Under Alternative 2, a launch, picnic area and trail would be constructed at site A with an optional 2,700 boat storage building and boathouses would be constructed at sites C, D, and E, all of which are within the boundary of the Georgetown Historic District. All of the proposed boathouses would have footprints between 3,600 square feet (SF) and 13,800 SF. The optional boat storage building at site A would be approximately 2,700 SF. The maximum height of the boathouses would be 45 feet (see table 1).

Direct Effects

Construction of the new boathouses and optional boat storage building would not have a direct effect on the adjacent NRHP-listed Washington Canoe Club and Potomac Boat Club or on the Alexandria Aqueduct, a DC historic landmark. Their settings would be altered as would the overall landscape of the Potomac River shoreline. However, the new buildings would be in keeping with historic recreational and

industrial activities in that area. The shoreline near the Alexandria Aqueduct was the site of numerous boathouses, including Dempsey's Boathouse, which was originally located between the Washington Canoe Club and Potomac Boat Club (figure 10). An historic photograph taken during the construction of the Key Bridge shows the entire section of shoreline from the Alexandria Aqueduct to the Washington Canoe Club filled entirely with boathouses, boat storage facilities, and docks (figure 11). The design of the new boathouses at sites C and D would be compatible with the existing boathouses in scale, massing, materials, and design. Moreover, the designs of any new buildings also would be reviewed by NPS, the District of Columbia State Historic Preservation Office (DC SHPO), and local organizations, including the Commission of Fine Arts (CFA) and the Old Georgetown Board, which would ensure their appropriateness within the Georgetown Historic District. *Consequently, there would be no adverse effect from the construction of boathouses and associated storage facilities under Alternative 2.*

Alternative 2 would have a direct effect on the Washington Canoe Club because the building would be rehabilitated according to the Secretary of the Interior's Standards and a fenced yard and outdoor storage would be removed. Pedestrian and service access would be extended from the Washington Canoe Club to boat storage and launches and picnic tables at site A, located to the west. *Any rehabilitation activities would be under the purview of NPS, the DC SHPO, and local preservation organizations, including the CFA and the Old Georgetown Board and thus, would not constitute an adverse effect.*



Source: Washington Canoe Club

Figure 10. Ice Dams along the Potomac River, Washington Canoe Club at Left, Proposed Site C in Center of Photo



Source: Washington Canoe Club

Figure 11. 1922 Photo Showing Shoreline within the NMBZ Site C, at Left of Aqueduct, Site D at Right of Aqueduct and Potomac Boat Club (adjacent to the aqueduct)

Alternative 2 would directly affect the Alexandria Aqueduct. The arch of the aqueduct previously has been used as boat storage with racks hanging from the underside of the arch. A fence also has been installed in the openings of the arch. These features would likely be removed and replaced with less permanent storage solutions beneath the arches, and any changes to the aqueduct would be reviewed by NPS, the DC SHPO, and local preservation organizations, including CFA and the Old Georgetown Board because of its location within the Georgetown Historic District. *Consequently, there would be no adverse effect from boat storage at the Alexandria Aqueduct.*

The C&O Canal Historic District is immediately adjacent to the north side of the NMBZ and would be directly affected by Alternative 2. Dense vegetation exists between the C&O Canal towpath and the CCT, which is not contributing to the historic character of the district (figure 12). Introduction of new boathouses and optional boat storage building would alter the shoreline and diminish the setting of the C&O Canal Historic District but would not alter any of characteristics that make the district eligible as a significant example of 19th century engineering and architectural technology. The setting of the district already has been significantly altered by the four-lane Canal Road to the north. *Alternative 2 would have no adverse effect on the C&O Canal Historic District.*



Figure 12. Capital Crescent Trail and Dense Vegetation to the North

Alternative 2 would have a direct effect on the Georgetown Historic District because it would introduce six new non-contributing buildings and two additional optional buildings into a district with approximately 340 contributing buildings, which would slightly diminish the district's integrity. However, the introduction of these modern buildings would not alter the characteristics of the historic district that make it eligible for listing under Criteria A and C and significant as a National Historic Landmark. Construction of the boathouses and storage facilities under Alternative 2 would alter the landscape of the historic district along the Potomac River. Because of the bend in the river and heavy vegetation along the south side of the C&O Canal towpath, construction activities and the new buildings would not be visible from the north, where most of the contributing buildings in the Georgetown Historic District are located. However, the rooflines of the new boathouses may be visible from Prospect Street. The introduction of these modern buildings would not significantly diminish the district integrity of setting given the limited visibility between Prospect Street and the shoreline. In addition, the designs of any new buildings would be reviewed by NPS, the National Capital Planning Commission, and the Old Georgetown Board, which would ensure their appropriateness within the Georgetown Historic District. The removal of three townhouses for the public plaza option on Site D would have no effect on the historic district as they were determined as non-contributing structures, presumably within the Georgetown Historic District, by SHPO architectural historian Tim Dennee in a letter to Tammy Stidham at the National Park Service, National Capital Region, dated February 4, 2015. *Given the limited visibility of the project area within the Georgetown Historic District and design review by the Old Georgetown Board, there would be no adverse effect on the contributing buildings within the Georgetown Historic District.*

Indirect Effects

The Key Bridge bisects the NMBZ and is in the direct APE. However, the bridge would be indirectly affected by Alternative 2. The bridge is listed in the NRHP under Criterion C in the area of engineering. Construction of new boathouses would diminish the integrity of the bridge's setting but would not

diminish the integrity of design, workmanship, materials, location, feeling, or association. *Alternative 2 would not constitute an adverse effect on the Key Bridge.*

The GWMP and cultural landscape is within the immediate vicinity of the NMBZ and would be indirectly affected by Alternative 2. Commuters and pedestrians using the GWMP would be able to see the changes along the Georgetown shoreline in varying degrees. Travelers heading in either direction on the GWMP would have an almost unencumbered view of the project area between the approximately 600 feet north/west of the Key Bridge and the North Lynn Street on-ramp. Dense vegetation west of the on-ramp and east of the Key Bridge on the GWMP would completely obscure the view of the opposite shoreline. The potential development associated with Alternative 2 would alter the setting of the GWMP slightly and would change the views as character-defining features of the parkway. However, introduction of the boathouses is compatible with what was on the shoreline historically. Thus, the historic district and cultural landscape would retain integrity of setting and remain eligible under Criterion C. In addition, development would be sympathetic to the aesthetic, and would not draw the attention of the casual observer. *Therefore, Alternative 2 would not adversely affect the GWMP.*

Theodore Roosevelt Island Historic District and cultural landscape would be indirectly affected by Alternative 2 because the setting of the district would be altered slightly by the introduction of a new boathouse east of the Key Bridge. However, this change to the setting would be negligible in the scale of the overall landscape surrounding the island. A boathouse such as the one being proposed was historically located along a waterfront, so the undertaking would not rise to the level of an adverse effect. *Therefore, the small scale boathouses proposed in Alternative 2 would not constitute an adverse effect on the Theodore Roosevelt Island Historic District.*

The Rock Creek and Potomac Parkway Historic District and cultural landscape is on the same shore as Alternative 2 and is approximately 0.5 mile downstream. The district would be indirectly affected by Alternative 2 because its setting would be altered. However, views of the project area from the historic district are very limited. The view of the project area is further obscured by the Key Bridge. Given the limited sightlines between the project area and the historic district, the setting of the historic district would not be diminished by the project. *As a result, there would be no adverse indirect effect on this NRHP-listed historic district because of limited visibility of the NMBZ.*

Similarly, the NRHP-listed Watergate and John F. Kennedy Center for the Performing Arts would be indirectly affected because each property's setting would be altered by Alternative 2. Both properties have limited views of the construction activities associated with Alternative 2 because of obstructions such as Theodore Roosevelt Island and the Key Bridge. *There would be no adverse effect on these NRHP-listed properties because of limited visibility of the NMBZ.*

CONCLUSION

The Assessment of Effects for the Nonmotorized Boathouse Zone Development Plan as an undertaking in accordance with regulations implementing Section 106 of the National Historic Preservation Act would have no adverse effect on the Georgetown Historic District, Washington Canoe Club, Potomac Boat Club, C&O Canal Historic District, Alexandria Aqueduct, Key Bridge, GWMP Historic District, Rock Creek & Potomac Parkway Historic District, Theodore Roosevelt Island, Watergate, and John F. Kennedy Center for the Performing Arts.

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