

# National Park Service



U.S. Department of the Interior  
Chesapeake & Ohio Canal National Historical Park

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## **Comment Analysis Report**

Chesapeake and Ohio Canal National Historical Park  
Georgetown Canal Plan  
Environmental Assessment

March 21, 2018

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## INTRODUCTION

### **Project Introduction**

The National Park Service (NPS), in partnership with Georgetown Heritage, Georgetown Business Improvement District (BID), and the District of Columbia Office of Planning, is preparing a Georgetown Canal Plan and a corresponding Environmental Assessment (Plan/EA) to revitalize portions of the Chesapeake and Ohio Canal National Historical Park (C&O Canal NHP) within the Georgetown neighborhood of the District of Columbia. Georgetown Heritage is the nonprofit organization created by community leaders to form a partnership with the NPS to restore, revitalize, and reimagine NPS's assets in Georgetown.

The Plan/EA proposes enhancements to a mile-long segment of the Canal that passes between Lock One (approximately 28th Street, NW) and the Aqueduct Bridge abutment and pier ruins (approximately 36th Street, NW), as well as portions of property along Rock Creek from the outlet of Rock Creek to the Potomac River, and the Tide Lock (Figure 1).

The Plan/EA will focus on addressing deferred maintenance issues and related safety and accessibility concerns associated with the towpath; improving connections between Georgetown and the C&O Canal towpath; enhancing visitor experience through increased signage; and optimizing underutilized areas. The Plan/EA will be developed in a manner that addresses the identified needs, while also preserving the historic character, integrity, and cultural significance of the C&O Canal NHP and the Georgetown Historic District (DC Landmark, National Register of Historic Places, National Historic Landmark).

The Georgetown Canal Plan is needed to provide a coordinated approach to address the following concerns:

- Portions of the towpath are uneven, narrow, and poorly lit, creating potential safety hazards;
- Visitors with limited mobility can only access the towpath from Grace Street, NW (south of the Canal). All other access points are not compliant with the Architectural Barriers Act Accessibility Standards (ABAAS);
- Many access points to the towpath are not readily visible or unknown due to lack of signage;
- The park desires to expand opportunities for interpretation, education, and cultural programming;
- The park has limited amenities and facilities for visitor comfort such as seating, drinking fountains, and rest rooms; and
- Several plazas along the Canal are underutilized and could be developed to provide additional recreational activities.

In accordance with the National Environmental Policy Act (NEPA), the Plan/EA will identify alternatives and assess the potential impacts of the proposed project. Concurrent to the NEPA process, NPS will work with the DC State Historic Preservation Office (DC SHPO), the Advisory Council on Historic Preservation, and other consulting parties to finalize a formal determination of effect through the Section 106 of the National Historic Preservation Act of 1966 as amended (NHPA) consultation process. The purpose of the Section 106 consultation process is to identify historic properties that could be affected by the Plan/EA; assess adverse effects on those

properties; and develop ways to resolve those effects through appropriate avoidance, minimization, and/or mitigation measures.



FIGURE 1: PROJECT AREA LOCATION MAP

## Scoping Activities

Public involvement and participation is an essential element of the NEPA process, engaging citizens in decision-making through planning and development. Public outreach is also a required action under Section 106 of the NHPA. As a part of the NEPA process, and to comply with the requirements of Section 106 of the NHPA, the NPS involved the public in project planning by holding a formal public scoping period from May 31, 2017 through July 14, 2017. Agencies, stakeholders, and the public were invited to submit comments on the project during this time period.

### *Public Scoping and Agency Coordination*

On May 31, 2017, the NPS distributed a public scoping letter to those individuals and groups in the stakeholder mailing database who were identified as having a potential interest in the project. Also on May 31, 2017, NPS posted a public scoping announcement to its Planning, Environment and Public Comment (PEPC) website. The scoping letters and announcement provided project details, encouraged participation in the scoping process, and provided notice of the public scoping meeting to be held June 14, 2017. Additionally, Georgetown Heritage invited members of the community to the public meeting via email and post card. Agencies, stakeholders, and the

public were encouraged to submit written suggestions, comments, and concerns on the project electronically through PEPC or by mailing comments to the C&O Canal NHP Headquarters.

During the scoping period, four (4) correspondences were received from agencies who received the scoping letter. Three (3) correspondences were received from federal agencies including the Environmental Protection Agency (EPA), the US Army Corps of Engineers (USACE), and the National Capital Planning Commission (NCPC). One (1) correspondence was received from the Tribal Historic Preservation Office (THPO) of the Delaware Nation. A summary of agency comments received during the scoping period is provided later in this report.

### *Agency Meetings*

On May 31, 2017, the NPS held a preliminary informational meeting at the Georgetown BID offices with representatives from NCPC, the Old Georgetown Board (OGB), the US Commission of Fine Arts (CFA), and the DC SHPO. The architectural firm James Corner Field Operations (JCFO), who has been hired to design the Georgetown Canal Plan, gave a brief presentation of the site analysis they prepared that outlined the general conditions of the Canal, including vegetation, infrastructure, character zones, and building materials; the Canal's development and historical role; and its local and regional importance as an urban park and link to many other resources within Washington, DC.

After the presentation, representatives from the agencies were asked to provide informal, preliminary feedback on the proposed project. Representatives from the agencies expressed support for the project but also cautioned against making too many modern upgrades. The agencies stressed the need to retain the historic character of the Canal and avoid superfluous vegetation plantings and "over-prettying" the Canal. However, they also suggested that any necessary improvements, such as accessibility upgrades, should not attempt to mimic the historic infrastructure of the Canal. Instead, these additions should be designed as modern elements that are distinct from the historic fabric. The agencies also expressed concern that the plan may lead to over-crowding of the park or that towpath improvements may encourage too many bike commuters. A full summary from this meeting can be found in Appendix C.

### *Public Meeting and Workshop*

A public scoping meeting and workshop was held on Wednesday, June 14, 2017, from 6:00-8:00pm at Canal Overlook at Georgetown Park (next to Dean & Deluca, 3276 M Street, NW) in Washington, DC. The public scoping meeting was held to give the public the opportunity to learn about the proposed project; identify any areas of concerns and opportunities regarding the proposed project; provide the public with an opportunity to share knowledge of important environmental and cultural issues that should be considered during the planning process; and solicit public feedback to inform the development of project alternatives. The format of the meeting was as follows:

- 6:00 – 6:15pm: Welcome, Introductions, Project Overview and NEPA/Section 106 Summary
- 6:15 – 6:50pm: Site Assessment Presentation and Q&A Session
- 6:50 – 7:35pm: Breakout Group Activities and Reporting
- 7:35pm: Formal Meeting Wrap up

### 8:00pm: Meeting Ends

As meeting attendees arrived, they were provided a brief overview of the meeting format as they signed-in and were assigned a table number at which to sit. Prior to the beginning of the meeting, attendees were encouraged to walk around and observe several posters that were placed around the meeting space to inform the public of the purpose and need for the project; the extent of the project area; preliminarily identified historic resources in the vicinity of the project area; and an outline of the NEPA and Section 106 processes. Team members from NPS, Georgetown Heritage, and consultant staff were on hand to engage in conversation with members of the public and answer questions. At 6:00pm attendees were asked to find their assigned tables and the meeting began shortly thereafter.

NPS began the meeting with introductions of project partners; a brief history and description of the Canal and NHP; and a brief overview of the project. NPS also outlined the NEPA and Section 106 processes and how they relate to the proposed project. Georgetown Heritage also gave a brief explanation of their role in the project and introduced the architectural firm, JCFO, who has been hired to design the Georgetown Canal Plan. Next, James Corner gave a presentation of the site assessment that his firm prepared which outlined the general conditions of the Canal, including, vegetation, infrastructure, character zones, and building materials; the Canal's development and historical role; and its local and regional importance as an urban park and link to many other resources within Washington, DC. After the presentation concluded, attendees were given an opportunity to ask questions about the proposed project and project team members provided answers to the best of their ability. Next, attendees were asked to participate in an activity in order to gather information about how they currently use the park and ways they might like to use the park in the future. Team members were present at each table to facilitate and direct the conversation, and to take notes based on input from participants. After the breakout sessions concluded, Georgetown Heritage provided a wrap-up of the meeting describing the next steps in the planning process and encouraging attendees to provide comments either electronically through PEPC or on comment cards provided at the registration table. Attendees were also informed of two informational handouts available at their tables: one developed by Georgetown Heritage describing the project and planning process; and one developed by NPS outlining the NEPA and Section 106 processes. As the meeting concluded, attendees were encouraged to revisit the posters and discuss the project with team members.

Approximately 200 individuals attended the public meeting including project team members, and NPS staff. Of those, two (2) individuals identified themselves as representing DC Advisory Neighborhood Commissions (ANC); two (2) individuals identified themselves as representing the American Society of Landscape Architects; and one (1) individual identified themselves as representing the NPS from Rock Creek Park. Sign-in sheets and an RSVP list for the public meeting are provided in Appendix B. Two (2) comment forms were submitted at the meeting and 13 questions were received on index cards during the Q&A portion of the meeting.

### *Stakeholder Engagement Meetings*

NPS and Georgetown Heritage have placed a high priority on stakeholder engagement and public outreach for this project. Georgetown Heritage intends to solicit public input throughout the entire process from preliminary plan development through design and implementation. As such, NPS and Georgetown Heritage held seven small "focus group" meetings with community members that live and work adjacent to the Canal; and other community



groups with an interest in the project. Table 1 below summarizes the dates and attendees of each of the meetings. Representatives from Georgetown Heritage, Georgetown BID, and NPS attended all meetings. Each meeting included a brief project overview and presentation of the site analysis prepared by JCFO. Following the presentation, attendees were encouraged to ask questions about the project; discuss ideas and suggestions for the project; and express concerns related to the project.

**TABLE 1: STAKEHOLDER OUTREACH MEETINGS HELD DURING SCOPING PERIOD**

Meeting Date	Stakeholder Group	Number of Attendees
June 6, 2017 (9:00am)	Adjacent Business Owners	4
June 6, 2017 (3:00pm)	Adjacent Business Owners	6
June 6, 2017	Adjacent Residents	18
June 8, 2017	Adjacent Residents	10
June 17, 2017	Adjacent Residents (Flour Mill Condominium Only)	16
July 10, 2017	Adjacent Business Owners	7
July 12, 2017	Adjacent Business Owners	3
July 13, 2017	Georgetown University Steering Committee	Unknown

On June 6, 2017, NPS and Georgetown Heritage held two meetings with representatives from canal-adjacent business owners, one at 9:00am and one at 3:00pm. Four (4) individuals attended the 9:00am meeting and represented the Rosewood Hotel, Washington DC; the Four Seasons DC; 3073 Canal Street, LLC; and Jamestown Urban Management, Georgetown Park. Six (6) individuals attended the 3:00pm meetings and represented the Latham Hotel; Snyder Properties, the owners of the Patagonia building; The Collective/Grace Street Coffee; the owner of several properties along the Canal including Canal Square and Sea Catch Restaurant; and several property managers including the building manager of the Flour Mill Building and M.C. Dunn, the EastBanc property manager. In addition, a canal-adjacent resident meeting was held on June 6, 2017. Eighteen (18) individuals attended this meeting from the following residences: 1015 33<sup>rd</sup> Street; 3303 Water Street; 1001 Papermill Court; 3150 South Street; 1015 33<sup>rd</sup> Street; 1011 Papermill Court; Canal House Condominiums; Georgetown Park Condominiums; and the Flour Mill Condominiums.

On June 8, 2017, Georgetown Heritage and NPS held a second meeting with canal-adjacent residents. Ten (10) individuals attended this meeting from the following residents: 3065-67 Canal Towpath; 1058 30<sup>th</sup> Street; 1059, 1061, 1066, and 1068 Thomas Jefferson Street; 1062 30<sup>th</sup> Street; and 3075 Canal Street. On June 17, 2017, Georgetown Heritage and NPS held a meeting with residents from the Flour Mill Condominium which is located adjacent to the Canal on Fishmarket Square. Sixteen individuals (16) from the Flour Mill Condominium attended this meeting.

On July 9, 2017, the Georgetown University Steering Committee requested the Georgetown Heritage give a brief presentation and overview of the project. Attendees expressed support and enthusiasm for the project. On July 10,

2017, Georgetown Heritage and NPS held a meeting with additional representatives from canal-adjacent business owners. Seven (7) individuals attended this meeting representing Potomac Investment, EastBanc, Inc., and the Libra Group. On July 12, 2017, Georgetown Heritage and NPS held a final meeting with canal-adjacent business owners. Three (3) individuals attended this meeting representing Bernstein Management, Walter E. Lynch, LLC, and the Foundry Building.

### **Nature of Comments Received during Scoping**

Sixty-three (63) pieces of correspondence from four states and the District of Columbia were received during the public scoping period. Individuals living in the vicinity of the project area (Virginia, Maryland and the District of Columbia) submitted 60 (approximately 93.8 %) of those correspondence pieces. Area residents and visitors made up the balance of correspondents.

Comments received during the public scoping period were generally in support of the proposed project. The majority of comments received either suggested specific activities or attractions the commenter would like to see in the park; or expressed concern from area residents and business owners that aspects of the plan would draw too many visitors, leading to excessive amounts of noise, light, trash, and congestion. Many commenters expressed a desire to retain the historic character of the park and hoped that the park would not be turned into a modern attraction. Commenters also requested the proposed project address the lack of public amenities within the park and the difficulty many have accessing the park. A comprehensive list of comments received during the scoping period can be found in Appendix A.

Other than suggestions for activities or attractions to add to the park as part of the proposed project, comments received during the scoping period generally did not provide additional information on existing conditions or resources that would assist with better understanding the affected environment or potential project impacts. It is important to note that all comments, regardless of their topic, were carefully read and analyzed and are presented in this report. NPS, Georgetown Heritage, Georgetown BID, and the DC Office of Planning are committed to continuing extensive public outreach and engagement throughout the remainder of the planning process.

#### *Summary of Agency Comments*

Four (4) correspondences were received from federal agencies during the scoping period. One (1) letter each was received from NCPC, EPA and USACE. Each correspondence gave recommendations on topics that each agency would like to see addressed in the EA. Special emphasis was placed on water resources, including stormwater management and wetlands; traffic and transportation; socioeconomics; environmental justice; cultural resources; visual resources; air quality; floodplains; and cumulative impacts from the project.

One (1) correspondence was received via email from the Director of Cultural Resources of the Delaware Nation. The Delaware Nation stated in their email to NPS that the project would not impact cultural or religious sites. They requested to be a formal consulting party under Section 106 and if any discoveries arise they should be contacted immediately.

### *Summary of Input Received at Stakeholder Engagement Meetings*

Attendees at the stakeholder engagement meetings were asked to provide ideas and share their concerns about the proposed project. They were also given the opportunity to ask questions about the proposed project to NPS and Georgetown Heritage. During the meetings, residents and business owners asked questions about the project schedule; the timeline of current Canal repairs; the boundary survey; current design ideas; logistics of mules returning to the Canal; and the status of the West Heating Plant pedestrian bridge. Ideas presented during these meetings included ways to maintain the serenity of the Canal; enhance existing qualities; add art installations; bring back the Canal boat; activate Georgetown at night; provide information about the Canal to area hotels; and increasing Canal activity at night in order to make it safer. Concerns expressed during the meetings included accessibility, safety, water quality, crowd management, graffiti, live and dead rats, tripping on bricks, trash, loitering, drug use, vagrancy, parking, congestion, slow bikes on towpath, plans for Fishmarket Square, and property values. Summaries of each stakeholder engagement meeting can be found in Appendix D.

### **Alternatives Development**

In accordance with NEPA, NPS must develop reasonable alternatives that address the purpose and need of the project. The NPS and Georgetown Heritage are committed to continued public involvement during the development of alternatives. A second public meeting and corresponding comment period were held to gather feedback on preliminary concept designs. Comments were accepted via PEPC from November 2, 2017 through January 5, 2018. The comment period was extended beyond 30 days to allow for an extended review of the complex concept designs and to accommodate the winter holidays.

### *Public and Agency Coordination*

On October 11, 2017, the NPS distributed a meeting invitation to those individuals and groups in the stakeholder mailing database. The mailing database was expanded to include those individuals and groups that participated in scoping. Also on October 11, 2017, NPS posted an alternatives public meeting Announcement to PEPC. The meeting invitation and announcement provided project details, announced the expansion of the project area, and provided notice of the alternatives public meeting to be held November 2, 2017. Additionally, Georgetown Heritage invited members of the community to the public meeting via email and post card. After the public meeting was held, display boards, handouts, and the presentation were posted to PEPC so the public could more thoroughly review concept designs and so those that were unable to attend the meeting could view the materials. Agencies, stakeholders, and the public were encouraged to submit written suggestions, comments, and concerns on the preliminary concept designs electronically through PEPC or by mailing comments to the C&O Canal NHP Headquarters.

### *Agency Meetings*

Georgetown Heritage, NPS, and JCFO met with OGB on the morning of November 2, 2017. JCFO presented the details of the plan and the preliminary concept designs to OGB in the form of an informational session. OGB was then able to provide immediate feedback on the concept designs. Other federal and District agencies were invited to and attended a public meeting held on November 2, 2017, and to comment on the preliminary concept designs.

### *Public Meeting and Workshop*

A public meeting and workshop was held on Thursday, November 2, 2017, from 6:00-8:00pm at Canal Overlook at Georgetown Park to give the public a chance to view preliminary concept designs for the Canal Plan. Meeting attendees were encouraged to ask questions about the designs and voice any concerns over what they saw. The format of the meeting was as follows:

- 6:00 – 6:15pm: Welcome and Introductions by Georgetown Heritage and NPS
- 6:15 – 6:45pm: Canal Plan Presentation
- 6:50 – 7:55pm: Breakout Group Stations
- 7:55pm: Formal Meeting Wrap up and closing remarks
- 8:00pm: Meeting Ends

As attendees entered the meeting, they were provided a brief overview of the meeting format as they signed-in and were given a group number which would be used later during the breakout activity. Prior to the beginning of the meeting, attendees were encouraged to walk around and observe several posters that were placed around the meeting space that showed the various concept designs. Team members from NPS, Georgetown Heritage, and consultant staff were on hand to engage in conversation with members of the public and answer questions. At 6:00pm attendees were asked to take their seats and the meeting began shortly thereafter.

Georgetown Heritage and NPS began the meeting with introductions and a brief summary of activities that have occurred since the public scoping meeting in June. Georgetown Heritage explained that comments received during the scoping period helped to inform the development of the preliminary concept designs that would be presented during this meeting. Georgetown Heritage also reminded the public that NPS was also engaged in the NEPA and Section 106 processes and alternatives development is an important step for both laws. Next, James Corner from JCFO gave a presentation of the preliminary concept designs. For ease of understanding, JCFO has broken the project area into several landscapes. Each landscape and its corresponding design concepts were presented individually. After the presentation concluded, attendees were asked to look at the number they were assigned at the beginning of the meeting and report to their corresponding stations which were set up around the meeting space. Attendees were instructed to take approximately 10 minutes at each station to review each landscape's concept designs in further detail and ask project team members questions. Attendees were also asked to rate the concept designs that they liked the best and the least by placing sticky dots on designated spots on the poster boards. Attendees could also write ideas, questions, and concerns on sticky notes and place them directly on the poster boards.

After the breakout activity concluded, Georgetown Heritage described the next steps in the planning process and encouraged attendees to provide comments either electronically through PEPC or on comment cards provided at the registration table. Attendees were also reminded that the meeting items would be posted to PEPC so they could review them in greater detail.

Approximately 110 members of the public attended the meeting. Representatives attended the meeting from ANCs, the District Department of Transportation (DDOT), and NPS staff from other parks. Sign-in sheets and an

RSVP list for the public meeting are provided in Appendix B. Three (3) comments were provided on comment cards at the meeting and two (2) comments were provided on index cards.

#### *Stakeholder Engagement Meetings*

NPS and Georgetown Heritage held several “focus group” meetings with community members during scoping and have held two more during this comment period as part of alternatives development.

Georgetown Heritage and the National Park Service met with members of the Georgetown Park Condominium Association on November 30, 2017, where over 30 people attended the meeting, Georgetown Heritage gave a brief overview of the Canal Plan, and then preliminary concept designs in the Wall landscape adjacent to the Georgetown Park Condominiums were presented in greater detail. After the presentation, an open discussion was held for comments and questions.

Georgetown Heritage met with members of the Flour Mill Condominium Association on December 12, 2017. Eleven (11) people attended the meeting. Sixteen (16) people attended the meeting, including Georgetown Heritage and NPS staff. Georgetown Heritage gave a brief overview of the Canal Plan, then preliminary concept designs in the Market Squares and the Bend landscapes adjacent to the Georgetown Park Condominiums were presented in greater detail. After the presentation, an open discussion was held for comments and questions.

### **Nature of Comments Received during Alternatives Development**

Eighty (80) pieces of correspondence from six states and the District of Columbia were received during the alternatives development comment period. Individuals living in the vicinity of the project area (Virginia, Maryland, and the District of Columbia) submitted 71 (approximately 88.8 %) of those correspondence pieces. Three (3) federal agencies and four (5) agencies from the District of Columbia provided comments on the project. Area residents, visitors, and local organizations made up the balance of correspondents.

Comments received during alternatives development were generally in support of the proposed project and the preliminary concept designs. Comments received generally focused on individual aspects from the landscapes that the commenter either liked or did not like. Commenters generally supported the concept designs but did offer many suggestions and expressed concerns about some aspects of the Canal Plan. Commenters expressed a desire to see a greater degree of natural resource preservation within the park; specifically, they wish to see more vegetated areas along the canal. Commenters supported improvements to the towpath. Commenters also overwhelmingly supported providing greater access to the park for a variety of users; although some expressed concerns over elevator and ramp locations. Some commenters felt that the concept designs did not address safety concerns raised in earlier meetings and they would like to see these issues addressed in the next concept presentation. A mix of comments were received regarding the active versus serene uses of the canal. Some supported more active uses in the NHP while others expressed a desire to see the canal remain a serene place for quiet and relaxation. A comprehensive list of comments received during the comment period can be found in Appendix A.

It is important to note that all comments, regardless of their topic, were carefully read and analyzed and are presented in this report. NPS, Georgetown Heritage, Georgetown BID, and the DC Office of Planning are

committed to continuing extensive public outreach and engagement throughout the remainder of the planning process.

*Summary of Agency Comments*

Three (3) correspondences were received from federal agencies during the alternatives development comment period. One (1) letter each was received from NCPC, USFWS, and EPA. NCPC provided extensive commentary on each landscape and concept design, identified regulations applicable to the project, and expressed concerns related to the preservation of historic features of the canal. EPA reviewed the concept designs and made several suggestions related to vegetation mitigation and using permeable materials for the towpath. EPA also recommended the use of erosion and sediment control practices during construction. The USFWS responded to a request for Endangered Species Act (ESA) Section 7 consultation. USFWS determined that the proposed activities are not likely to adversely affect any federally listed threatened or endangered species or critical habitat.

During the OGB meeting held on November 2, 2017, board members commented on many aspects of the Canal Plan and preliminary concept designs. Board members liked the proposed Visitor Center and enhancing access and vitality of the canal. Members expressed concerns over cultural resources that may be affected by the designs and that the designs may change the overall character of the canal.

*Summary of Input Received at Stakeholder Engagement Meetings*

Georgetown Heritage held two stakeholder meetings during the comment period. Georgetown Heritage met with members of the Georgetown Park Condominium Association on November 30, 2017. During the meeting, attendees expressed excitement about the project. Overall, residents expressed concerns related to noise, trash, crime, traffic, and homelessness around their homes. Residents would like to see these concerns, as well as a long-term safety plan, addressed in the Canal Plan. Questions were also raised about construction phasing, the budget for construction, and the sustainability and maintenance of the Canal Plan.

Georgetown Heritage met with members of the Flour Mill Condominium Association on December 12, 2017. During the meeting, attendees expressed excitement about the project. Overall, residents expressed concerns related to noise, seating, vegetation along the canal, and land ownership and liability. A few residents expressed concerns over the possible installation of elevators, stating that it would not be kept clean. Attendees in this meeting also questioned the long-term maintenance plan for the activities planned.

## **The Comment Analysis Process**

Comment analysis is a process used to compile and combine similar public comments into a format that can be used by decision makers and the project team responsible for the C&O Canal NHP Georgetown Canal Plan/EA. In the scoping phase, comment analysis helps the project team to refine the topics and issues to be evaluated and considered in the EA, in accordance with regulations implementing NEPA and Section 106 of the NHPA.

As the NEPA process continues, comment analysis will help the project team for the C&O Canal NHP Georgetown Canal Plan/EA organize and clarify technical information, refine the scope of the EA, define alternatives and issues to be addressed, and effectively evaluate potential impacts associated with the alternatives. The comment analysis process includes five main components:

- developing a coding structure to organize comments by topics
- employing a comment database for comment management
- reading and coding public comments
- interpreting and analyzing the comments to identify issues and themes
- preparing a comment summary

A coding structure was developed to help sort comments into logical groups by topic and issue. The coding structure was derived from an analysis of the range of topics discussed during internal NPS scoping and from comments received from members of the public. The coding structure was designed to capture all comment content rather than to restrict or exclude any ideas.

The PEPC database was used to manage and organize the comments. The database stores the full text of all correspondence and allows each comment to be coded by topic or issue. Outputs from the database, which are provided as tables in the Content Analysis Report below, include tallies of the total number of pieces of correspondence and comments received, sorting and reporting of comments by a particular topic or issue, and demographic information about the sources of the comments. Analysis of the public comments in PEPC involves assigning the codes to statements made by the public in their letters, emails, web forms, and comments provided at the public meetings. All comments received during the public scoping comment period were read and analyzed. Although the comment analysis process attempts to capture the full range of public concerns, comment analysis is not a vote-counting process and this report is not intended as a statistical analysis. This report is intended to be a summary of the different concerns, issues, and opinions raised by the comments received. The emphasis is on content of the comments, rather than the number of times a particular comment was received.

### **Definition of Terms**

Primary terms used in the document are defined below:

**Correspondence:** A correspondence is the entire document received from the public – including individuals, organizations, government officials, and agency representatives. It can be in the form of a letter, comment card, or PEPC website comment form. Each piece of correspondence is assigned a unique identification number in the PEPC system.

**Comment:** A comment is a portion of the text within a correspondence that addresses a single subject. It could include such information as an expression of support or opposition to a proposed activity, additional data regarding the existing condition, an opinion questioning a matter of policy, or an opinion regarding the adequacy of an analysis.

**Code:** A grouping centered on a common topic or subject matter with which the public is concerned. The codes were developed during the scoping process and are used to track major subjects throughout the NEPA process.

**Concern:** Concerns are subdivisions of codes. Each code was further separated into several concern statements to provide a better focus on the content of comments.

## **Guide to This Document**

This report is organized as follows:

**Content Analysis Report** – This is the basic report produced from PEPC that provides information on the numbers and types of comments received, organized by code. The first section of the report provides a summary of the number of comments that were coded under each topic. The second section provides general demographic information, such as the states where commenters live, the number of letters received from different categories of organizations, etc.

**Public Comment Summary** – This report summarizes the substantive comments received during public scoping and organizes them by comment code

**Concern Statement by Comment Code:** Comments are summarized by concern statements for each comment code. This report shows each comment code, its corresponding concern statement, and a representative quote, which was selected by park staff after reviewing all comments.

**Correspondences Submitted** – This is a complete listing of all correspondences submitted.



## SCOPING SUMMARY (CONTENT ANALYSIS REPORT)

TABLE 2: COMMENT DISTRIBUTION BY CODE

Code	Description	Total
AL1000	Alternatives: Alternative Ideas	22
AL2000	Alternatives: Support for Minor Improvements Only	11
AL3000	Alternatives: Amenities	6
AL4000	Alternatives: Support for Activating Underutilized Areas Along Canal	4
GC1000*	General Comments: General Support for the Project	7
GC2000*	General Comments: Miscellaneous Questions and Comments	4
HP1000	Historic Preservation: Retain Historic Natural of Canal	15
NE1000	NEPA/Section 106: Compliance Considerations/EA Topics	9
PO1000	Park Operations: Maintenance Plan Needed for Park	5
SS1000	Safety and Security: Loitering Concerns	4
SS2000	Safety and Security: Other Safety Concerns	9
VU/VE1000	Visitor Use and Experience: Accessibility	14
VU/VE2000	Visitor Use and Experience: Lighting	7
VU/VE3000	Visitor Use and Experience: Do Not Support Non-motorized vessels in Canal	2
VU/VE4000	Visitor Use and Experience: Towpath Improvements	5
VU/VE5000	Visitor Use and Experience: Water in Canal	8
VU/VE6000	Visitor Use and Experience: Connectivity with the Rest of the NHP and Neighborhood	3
VU/VE7000	Visitor Use and Experience: Concerns with Attracting Too Many Visitors to Park	5
VU/VE8000	Visitor Use and Experience: Resident Concerns	9
VU/VE9000	Visitor Use and Experience: Retain Oasis-like Feel of Park	9
VU/VE1100	Visitor Use and Experience: Vandalism	4
WV1000	Wildlife and Vegetation: Preserve/Increase Vegetation and Wildlife Along Canal	10
WV2000	Wildlife and Vegetation: Preserve Existing Green Spaces	2

\*Non-Substantive

**TABLE 3: CORRESPONDENCE SIGNATURE COUNT BY ORGANIZATION TYPE**

Organization Type	Number of Correspondence Signatures
Unaffiliated Individual	44
Federal Agency	4
Local Organizations*	13
Business	2
<b>TOTAL</b>	<b>63</b>

\*These individuals are listed in PEPC as Unaffiliated but indicated elsewhere that they represented a local organization

**TABLE 4: CORRESPONDENCE SUBMITTED BY AFFILIATED INDIVIDUALS**

Organization Type	Organization Name	Number of Correspondence Signatures
<b>Federal Agency</b>		
	EPA Region III	1
	NCPC	1
	USACE	1
	Delaware Nation	1
<b>Local Organizations</b>		
	Advisory Neighborhood Commission	2
	Citizens Association of Georgetown	1
	C&O Canal Association	3
	C&O Canal Trust	1
	Flour Mill Condominium	4
	Georgetown BID	1
	Georgetown Heritage	1
<b>Businesses</b>		
	Casey Trees	1
	Oliver Carr Company	1
<b>TOTAL</b>		<b>19</b>

**TABLE 5: CORRESPONDENCE DISTRIBUTION BY CORRESPONDENCE TYPE**

Type	Number of Correspondences	Percentage
PEPC	60	95.2%
Email	1	1.6%
Letter	2	3.2%
TOTAL	63	

**TABLE 6: CORRESPONDENCE DISTRIBUTION BY STATE**

State	Number of Correspondences	Percentage
DC	40	63.5%
Unknown	12	19.0%
MD	7	11.1%
PA	2	3.2%
VA	1	1.6%
OK	1	1.6%
TOTAL	63	

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## SCOPING PERIOD COMMENT SUMMARY

### Concern Statements by Comment Code

#### ***AL1000 - Alternatives: Alternative Ideas***

**CONCERN STATEMENT:** (Concern ID: 59888) Commenters suggest various activities and attractions they would like to see along the canal.

**Representative Quote(s):**

**Corr. ID:** 15 **Organization:** *Not Specified* **Comment ID:** 648437 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The two ends of this section, Tidelock and the Alexandria Aqueduct, merit special attention as potential gathering places with great views.

#### ***AL2000 - Alternatives: Minor Improvements Only***

**CONCERN STATEMENT:** (Concern ID: 59889) Commenters support the project, but do not wish to see major changes along the Canal.

**Representative Quote(s):**

**Corr. ID:** 42 **Organization:** *Not Specified* **Comment ID:** 648517 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I hope that enhancements will be done with a light touch and will avoid creating the feel of a programmed experience.

#### ***AL3000 - Alternatives: Amenities***

**CONCERN STATEMENT:** (Concern ID: 59890) Commenters support the addition of basic amenities in the Park.

**Representative Quote(s):**

**Corr. ID:** 8 **Organization:** C&O Canal Association **Comment ID:** 648416 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The carefully planned addition of amenities such as drinking fountains and rest rooms would also be very welcome.

#### ***AL4000 - Alternative: Support for activating underutilized areas along canal***

**CONCERN STATEMENT:** (Concern ID: 59891) Commenters support and suggest ideas for the underutilized plazas along the Canal.

**Representative Quote(s):**

**Corr. ID:** 8 **Organization:** C&O Canal Association **Comment ID:** 648418 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Certain underused parts of the canal park, such as the Mile Zero/Tidelock area, deserve increased attention and visitation.

#### ***GC1000 - General Comment: General Support for Project***

**CONCERN STATEMENT:** (Concern ID: 59903) Commenters generally support the project.

**Representative Quote(s):**

**Corr. ID:** 11 **Organization:** *Not Specified* **Comment ID:** 648426 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I am in full support of this exciting, important effort to redesign and invigorate the Washington DC C&O Canal

**GC2000 - General Comment: Miscellaneous Questions and Comments**

**CONCERN STATEMENT:** (Concern ID: 59904) Commenters asked questions and commented on the historical information presented by NPS.

**Representative Quote(s):**

**Corr. ID:** 18 **Organization:** Flour Mill Condominium owner **Comment ID:** 648457 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The primary question to be answered is...What will be the measure of success of this project?

**HP1000 - Historic Preservation: Retain Historic Nature of Canal**

**CONCERN STATEMENT:** (Concern ID: 59905) Commenters express the need to highlight and preserve the historic character of the NHP.

**Representative Quote(s):**

**Corr. ID:** 59 **Organization:** ANC 3D **Comment ID:** 648588 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Preserving the character of the Park's "historical" designation should take precedence over other planning and design considerations.

**NE1000 - Compliance Considerations**

**CONCERN STATEMENT:** (Concern ID: 59892) Commenters provided various topics that they would like to see addressed in the EA.

**Representative Quote(s):**

**Corr. ID:** 62 **Organization:** EPA Region III **Comment ID:** 648616 **Organization Type:** Federal Government

**Representative Quote:** The EA should examine the potential direct and indirect impacts of the project on the environment. In addition, mitigation measures for any adverse environmental impacts should be described.

**PO1000 - Park Operations: NHP Needs Maintenance Plan**

**CONCERN STATEMENT:** (Concern ID: 59910) Commenters express the need to develop a maintenance plan after the project is complete.

**Representative Quote(s):**

**Corr. ID:** 60 **Organization:** Flour Mill Condominium **Comment ID:** 648607 **Organization Type:** Unaffiliated Individual

**Representative Quote:** This leads to the question of maintaining what is sure to be a wonderful revitalized canal. I feel strongly that the canal should have a proper budget for this aspect of the project.

**SS1000 - Safety and Security: Concerns with Loitering**

**CONCERN STATEMENT:** (Concern ID: 59906) Commenters oppose improvements that would encourage prolonged loitering.

**Representative Quote(s):**

**Corr. ID:** 20 **Organization:** Not Specified **Comment ID:** 648632 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I support the restoration of the canal, it is a wonderful part of our history worth renovating and protecting. But a wonderful renovation project does not allow elements which encourages or allows camping, continuous sleeping, or un-neighborly behavior.

**SS2000 - Safety and Security: Other Safety concerns**

**CONCERN STATEMENT:** (Concern ID: 59907) Commenters noted various safety issues along the Canal.

**Representative Quote(s):**

**Corr. ID:** 41 **Organization:** Georgetown Business Improvement District **Comment ID:** 648509

**Organization Type:** Unaffiliated Individual

**Representative Quote:** They support improved safety through the installation of more, and better, lighting and other improvements to the tow path, bridges, and plazas.

**VU/VE1000 - Visitor Use and Experience: Accessibility**

**CONCERN STATEMENT:** (Concern ID: 59893) Commenters encourage improvements that make the Park more accessible to a variety of users.

**Representative Quote(s):**

**Corr. ID:** 2 **Organization:** *Not Specified* **Comment ID:** 648398 **Organization Type:** Unaffiliated Individual

**Representative Quote:** All of the connections into the park need to be enhanced by making the park more accessible and easier to find through improved wayfinding and bridge, stairs, and path upgrades.

**VU/VE1100 - Visitor Use and Experience: Vandalism**

**CONCERN STATEMENT:** (Concern ID: 59902) Commenters expressed concerns over vandalism along the Canal.

**Representative Quote(s):**

**Corr. ID:** 42 **Organization:** *Not Specified* **Comment ID:** 648521 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Such improvements in this section of the park would have to be combined with an increased effort to control litter and graffiti

**VU/VE2000 - Visitor Use and Experience: Lighting**

**CONCERN STATEMENT:** (Concern ID: 59894) Commenters express the need for lighting along the towpath.

**Representative Quote(s):**

**Corr. ID:** 43 **Organization:** *Not Specified* **Comment ID:** 648523 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Also, I hope that lighting will be thoughtful and considerate. While lighting is an important security consideration, there is much evidence that "over" lighting can disrupt sleep patterns for neighboring properties and uplighting is wasteful and does not contribute to security.

**VU/VE3000 - Visitor Use and Experience: Do not support non-motorized vessels in Canal**

**CONCERN STATEMENT:** (Concern ID: 59895) Commenters do not support kayaking or canoeing in the canal as there are other opportunities for this activity in the immediate vicinity of the Park.

**Representative Quote(s):**

**Corr. ID:** 18 **Organization:** Flour Mill Condominium owner **Comment ID:** 648453 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Kayaking and canoeing opportunities are readily available very nearby on the Potomac. Promoting such activities in the Canal is redundant and unnecessary, and threatens the quiet and pastoral setting the Canal provides in the heart of Georgetown.

**VU/VE4000 - Visitor Use and Experience: Towpath Improvements**

**CONCERN STATEMENT:** (Concern ID: 59896) Commenters express general support and suggestions for towpath improvements.

**Representative Quote(s):**

**Corr. ID:** 38 **Organization:** *Not Specified* **Comment ID:** 648495 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Beauty will always attract people, and a well-maintained Canal and towpath will be welcome.

***VU/VE5000 - Visitor Use and Experience: Water Canal***

**CONCERN STATEMENT:** (Concern ID: 59897) Commenters expressed a desire to see water returned to the Canal and an emphasis on improving water quality.

**Representative Quote(s):**

**Corr. ID:** 41 **Organization:** Georgetown Business Improvement District **Comment ID:** 648510

**Organization Type:** Unaffiliated Individual

**Representative Quote:** Our members want to ensure the Canal is restored to good physical condition so that it is able to hold water and remain beautiful.

***VU/VE6000 - Visitor Use and Experience: Connectivity with the rest of the NHP and surrounding neighborhood***

**CONCERN STATEMENT:** (Concern ID: 59898) Commenters hope that the project will help connect the Georgetown portion of the Park with the surrounding neighborhood and the rest of the NHP.

**Representative Quote(s):**

**Corr. ID:** 50 **Organization:** Georgetown Heritage **Comment ID:** 648564 **Organization Type:** Unaffiliated Individual

**Representative Quote:** To promote and expand the connectivity of the park to its urban context, to the rest of the C& O Canal NHP, to our regional park system, and to the many communities (neighbors, DC-wide, regional, and national) that use and love the canal.

***VU/VE7000 - Visitor Use and Experience: Concerns over drawing additional visitors to the NHP***

**CONCERN STATEMENT:** (Concern ID: 59899) Commenters express general concerns of the consequences of attracting additional visitors and encourage designs that do not draw more people.

**Representative Quote(s):**

**Corr. ID:** 60 **Organization:** Flour Mill Condominium **Comment ID:** 648598 **Organization Type:** Unaffiliated Individual

**Representative Quote:** ...but I am also concerned with what seems to be an attempt thru this restoration to bring more people into an already busy neighborhood.

***VU/VE8000 - Visitor Use and Experience: Resident Concerns***

**CONCERN STATEMENT:** (Concern ID: 59900) Residents and business owners along the Canal express concern over impacts the project will have on their daily lives.

**Representative Quote(s):**

**Corr. ID:** 38 **Organization:** *Not Specified* **Comment ID:** 648493 **Organization Type:** Unaffiliated Individual

**Representative Quote:** While it would be great to provide better maintenance and upkeep of the Canal and its towpath, please remember that this is a residential neighborhood. Residents do not want to walk out of their homes into a giant theme park

***VU/VE9000 - Visitor Use and Experience: Retain Oasis-like feel of NHP***

**CONCERN STATEMENT:** (Concern ID: 59901) Commenters expressed the Importance of preserving the tranquil setting of the Canal.

**Representative Quote(s):**

**Corr. ID:** 57 **Organization:** *Not Specified* **Comment ID:** 648584 **Organization Type:** Unaffiliated Individual

**Representative Quote:** My favorite part of the canal is the feeling of escape from the city and I hope that this project maintains that feeling.

***WV1000 - WV1000 - Wildlife and Vegetation: Preserve/Increase vegetation and wildlife along canal***

**CONCERN STATEMENT:** (Concern ID: 59908) Commenters expressed the desire to preserve the existing natural resources within the Park.

***Representative Quote(s):***

**Corr. ID:** 16 **Organization:** The World Famous Flour Mill Condominium Roof Deck Committee **Comment ID:** 648438 **Organization Type:** Unaffiliated Individual

**Representative Quote:** -I would greatly appreciate preserving as many trees as possible. I think trees add a great deal to the beauty of the canal, as well as shade and privacy.

**WV2000 - Wildlife and Vegetation: Preserve existing Green Spaces**

**CONCERN STATEMENT:** (Concern ID: 59909) Commenters want the existing green spaces along the Canal to remain undeveloped.

***Representative Quote(s):***

**Corr. ID:** 34 **Organization:** *Not Specified* **Comment ID:** 648634 **Organization Type:** Unaffiliated Individual

**Representative Quote:** It's tempting to build things in these open spaces, but these spaces need to be preserved as green lawns because they offer a rare green respite from all the concrete in this part of Georgetown. Please keep these areas green, natural, open and unspoiled.

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**ALTERNATIVES COMMENT SUMMARY (CONTENT ANALYSIS REPORT)**



TABLE 7: COMMENT DISTRIBUTION BY CODE

Code	Description	Total
AL5000	Alternatives: Progressive (Contemporary) Design	12
AL6000	Alternatives: Resiliency	7
AL7000	Alternatives: Walls	3
AL8000	Alternatives: Bridges/Boardwalks	18
GC1000*	General Comment: General Support for Project	9
GC2000*	General Comment: Miscellaneous Questions and Comments	10
HP1000	Historic Preservation: Retain Historic Nature of Canal	22
HP2000	Historic Preservation: Rehabilitation	7
NE1000	Compliance Considerations	4
SE1000	Socioeconomics	5
SS2500	Safety	23
VU/VE1000	Visitor Use and Experience: Accessibility	21
VU/VE1200	Visitor Use and Experience: Circulation (Internal)	14
VU/VE1400	Visitor Use and Experience: Interpretation	15
VU/VE1500	Visitor Use and Experience: Users (Diversity)	10
VU/VE1600	Visitor Use and Experience: Seating	15
VU/VE1700	Visitor Use and Experience: Signage	8
VU/VE1900	Visitor Use and Experience: Visitors Center	10
VU/VE2000	Visitor Use and Experience: Lighting	12
VU/VE2100	Visitor Use and Experience: Active vs. Serene	21
VU/VE2300	Visitor Use and Experience: Bikes	11
VU/VE4000	Visitor Use and Experience: Towpath Improvements	22
VU/VE5000	Visitor Use and Experience: Water Canal	7
VU/VE6000	Visitor Use and Experience: Connectivity with the rest of the NHP and surrounding neighborhood	14
WV3000	Wildlife and Vegetation: Nature and Biodiversity	23

\*Non-substantive

**TABLE 8: CORRESPONDENCE SIGNATURE COUNT BY ORGANIZATION TYPE**

Organization Type	Number of Correspondence Signatures
Federal Government	3
Local Government*	5
Local Organizations*	15
Unaffiliated Individual	53
Businesses*	4
<b>TOTAL</b>	<b>80</b>

\*These individuals are listed in PEPC as Unaffiliated but indicated elsewhere that they represented a local organization, government agency, or business.

**TABLE 9: CORRESPONDENCE SUBMITTED BY AFFILIATED INDIVIDUALS**

Organization Type	Organization Name	Number of Correspondence Signatures
<b>Federal Agency</b>		
	EPA	1
	USFWS	1
	NCPC	1
<b>Local Government</b>		
	ANC 2E	1
	DC Office of Planning SHPO	1
	DC Department of Energy & Environment	1
	Recreational Trails Advisory Committee of Washington	1
	District Department of Transportation	1
<b>Local Organizations</b>		
	Adventure Cycling Association	1
	Audubon Society of DC	1
	Canoe Cruisers Association	2
	Capital Trails Coalition	1
	C&O Canal Association	1
	City Wildlife, Inc.	1
	Committee of 100 on the Federal City	2
	Friends of Georgetown Park	1
	Georgetown Business Improvement District	1
	LCTHF-NCC	1
	Potomac Boat Club	1
	U.S. News & World Report	1
	Washington Area Bicyclist Association	1

<b>Businesses</b>	
Georgetown Park	1
KGP Design Studios, LLC	1
Lacy Foundries, LLC	1
RB Properties, Inc.	1
<b>TOTAL</b>	<b>27</b>

**TABLE 10: CORRESPONDENCE DISTRIBUTION BY CORRESPONDENCE TYPE**

Type	Number of Correspondences	Percentage
Web From	66	82.5%
Letter	6	7.5%
E-mail	3	3.75%
Park Form	3	3.75%
Other	2	2.5%
<b>TOTAL</b>	<b>80</b>	

**TABLE 11: CORRESPONDENCE DISTRIBUTION BY STATE**

State	Number of Correspondences	Percentage
DC	55	68.75%
MD	11	13.75%
VA	5	6.25%
Unknown	4	5%
MA	2	2.5%
CA	1	1.25%
MT	1	1.25%
PA	1	1.25%
<b>TOTAL</b>	<b>80</b>	

## ALTERNATIVES COMMENT SUMMARY

### Concern Statements by Comment Code

#### **AL5000 - Alternatives: Progressive (Contemporary) Design**

**CONCERN STATEMENT:** (Concern ID: 60415) Commenters suggested additional concepts and elements of design.

**Representative Quote(s):**

**Corr. ID:** 6 **Organization:** *Not Specified* **Comment ID:** 660099 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Fine to better take advantage of existing spaces, but less need to blast out much larger spaces where none existed before...with the exception being at the aqueduct. Good spot there to maybe do something more creative and attract more people for larger events.

#### **AL6000 - Alternatives: Resiliency**

**CONCERN STATEMENT:** (Concern ID: 60416) Commenters expressed concerns related to the resilience of portions of the plan to flooding and the ability of the park to maintain improvements.

**Representative Quote(s):**

**Corr. ID:** 52 **Organization:** Committee of 100 on the Federal City **Comment ID:** 660627 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Therefore, for the concept plan to succeed, every alternative selected must be sustainable, able to withstand flooding. For example, flood-vulnerable alternatives such as boardwalks, elevators, new flower beds, and alternatives B and C for the towpath should be re-evaluated.

#### **AL7000 - Alternatives: Walls**

**CONCERN STATEMENT:** (Concern ID: 60419) Commenters suggested that the Walls be preserved or remain unchanged.

**Representative Quote(s):**

**Corr. ID:** 51 **Organization:** Committee of 100 on the Federal City **Comment ID:** 660602 **Organization Type:** Unaffiliated Individual

**Representative Quote:** The walls are a record of how the canal has evolved over time and need to be examined within this context. While the walls are not included as contributing elements to the historic canal in the National Register nomination, they have gained significance over time and contribute strongly to the historic and present character of the canal (see Treatment Standard 4).

#### **AL8000 - Alternatives: Bridges/Boardwalks**

**CONCERN STATEMENT:** (Concern ID: 60417) Commenters offered suggestions, support, or disapproval for proposed bridges and boardwalks.

**Representative Quote(s):**

**Corr. ID:** 74 **Organization:** National Capital Planning Commission **Comment ID:** 660980 **Organization Type:** Unaffiliated Individual

**Representative Quote:** NCPC staff supports locating trail users further from vehicle traffic, as shown in Alternative B, which introduces a boardwalk on the west side of Rock Creek.

#### **HP1000 - Historic Preservation: Retain Historic Nature of Canal**

**CONCERN STATEMENT:** (Concern ID: 60412) Commenters expressed concern that the proposed actions may detract from the historic properties of the NHP.

**Representative Quote(s):**

**Corr. ID: 47 Organization: Not Specified Comment ID: 660476 Organization Type: Unaffiliated Individual**  
**Representative Quote:** In general, I am concerned that the special historic character that is the C&O canal has been compromised with this plan. Yes the canal certainly needs restoration and support but it is a Historical National Park not a waterside recreation center as parts of the current plan seem to be drifting toward.

#### ***HP2000 - Historic Preservation: Rehabilitation***

**CONCERN STATEMENT:** (Concern ID: 60413) Commenters supported the rehabilitation of existing features of the canal.

##### ***Representative Quote(s):***

**Corr. ID: 45 Organization: Not Specified Comment ID: 660462 Organization Type: Unaffiliated Individual**  
**Representative Quote:** Repair and stabilize towpath edges with stones (rather than machine-cut granite blocks) for historic accuracy and to allow vegetation to grow between the stones for the benefit of the Canal wildlife (fish, turtles, ducklings, etc.)

#### ***NE1000 - Compliance Considerations***

**CONCERN STATEMENT:** (Concern ID: 60420) Commenters suggested mitigation and additional studies related to the project.

##### ***Representative Quote(s):***

**Corr. ID: 52 Organization: Committee of 100 on the Federal City Comment ID: 660628 Organization Type: Unaffiliated Individual**  
**Representative Quote:** In 2016, a study was done for the National Park Service (NPS), C&O Canal Lower Reach Flood Response Plan. This study appears to be very important for the Environmental Assessment, but is not yet public, and we urge that it be posted on the PEPC website and used in evaluating the environmental impacts of the concept plan.

#### ***SE1000 - Socioeconomic***

**CONCERN STATEMENT:** (Concern ID: 60411) Commenters were concerned that proposed improvements may encourage vagrancy.

##### ***Representative Quote(s):***

**Corr. ID: 59 Organization: Not Specified Comment ID: 660871 Organization Type: Unaffiliated Individual**  
**Representative Quote:** Creating access should also not entail adding spaces under overhangs or 'natural' shelters due to the problems in this area with homeless citizens congregating in masses

#### ***SS2000 - Safety***

**CONCERN STATEMENT:** (Concern ID: 60410) Commenters noted various safety issues along the Canal.

##### ***Representative Quote(s):***

**Corr. ID: 59 Organization: Not Specified Comment ID: 660879 Organization Type: Unaffiliated Individual**  
**Representative Quote:** Keep safety in mind- - always. Preserve, to the best extent possible the ease of pedestrian traffic. Take some precautions about bikers who, in some areas of the Towpath, create a hazard for pedestrians. These areas should be made to be compatible for the different stakeholders using the area (residents and tourists) and not be competitive to those same people, particularly the residents living along the trail.

#### ***VU/VE1000 - Visitor Use and Experience: Accessibility***

**CONCERN STATEMENT:** (Concern ID: 60398) Commenters expressed the desire for improved access for all users, including people with disabilities.

##### ***Representative Quote(s):***

**Corr. ID: 39 Organization: Not Specified Comment ID: 660313 Organization Type: Unaffiliated Individual**

**Representative Quote:** We support a ramp instead of steps on the river side of the 33rd Street pedestrian bridge. We do not see a need for a ramp on the berm side of that bridge. We do support ramps instead of stairs on both sides of the 34th Street pedestrian bridge. Wheelchair access to the berm side of the 33rd Street bridge can come from the Market Plazas and the 34th Street bridge just shown distances away.

**VU/VE1200 - Visitor Use and Experience: Circulation (Internal)**

**CONCERN STATEMENT:** (Concern ID: 60399) Commenters supported connections within the park to increase circulation or suggested additional circulation opportunities.

**Representative Quote(s):**

**Corr. ID:** 39 **Organization:** *Not Specified* **Comment ID:** 660278 **Organization Type:** Unaffiliated Individual

**Representative Quote:** We definitely want to see a foot and bike path behind Thompson Boat Center to allow full access to the area by anyone (item 4 on the Comprehensive Alternative).

**VU/VE1400 - Visitor Use and Experience: Interpretation**

**CONCERN STATEMENT:** (Concern ID: 60400) Commenters expressed a need for retaining the interpretative character of the park.

**Representative Quote(s):**

**Corr. ID:** 51 **Organization:** Committee of 100 on the Federal City **Comment ID:** 660587 **Organization Type:** Unaffiliated Individual

**Representative Quote:** It is important for visitors to have an understanding of the use of the Aqueduct over time, the canal on the other side to Alexandria, etc. It seems clear that interpretation of this area is very important.

**VU/VE1500 - Visitor Use and Experience: Users (Diversity)**

**CONCERN STATEMENT:** (Concern ID: 60401) Commenters supported accommodations for different user types.

**Representative Quote(s):**

**Corr. ID:** 73 **Organization:** Capital Trails Coalition **Comment ID:** 660963 **Organization Type:** Recreational Groups

**Representative Quote:** The section of trail along the west side Rock Creek to the confluence with the Potomac River should also be wide enough to accommodate both bicyclists and pedestrians. The design on the north side of the canal should be focused on pedestrians. The focus on the south side of the canal should be on bicyclists, coming from or connecting to the K/Water St protected bike lanes via the bridge over Rock Creek.

**VU/VE1600 - Visitor Use and Experience: Seating**

**CONCERN STATEMENT:** (Concern ID: 60402) Commenters expressed concerns and support over adding seating along the canal.

**Representative Quote(s):**

**Corr. ID:** 26 **Organization:** *Not Specified* **Comment ID:** 660182 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Please tell the park designers, to put in plentiful seating. It would make the whole experience so much more enjoyable for everyone. As it stands now, the park is only good for walking.

**VU/VE1700 - Visitor Use and Experience: Signage**

**CONCERN STATEMENT:** (Concern ID: 60403) Commenters supported signage for way finding and to provide information.

**Representative Quote(s):**

**Corr. ID:** 6 **Organization:** *Not Specified* **Comment ID:** 660097 **Organization Type:** Unaffiliated Individual

**Representative Quote:** Signage (and the main bike route) coming the other way from the Mall can be improved to help bikers find their way over Rock Creek to the C&O and the zero mile marker.

***VU/VE1900 - Visitor Use and Experience: Visitors Center***

**CONCERN STATEMENT:** (Concern ID: 60404) Commenters supported and offered suggestions regarding the development of a visitor center.

***Representative Quote(s):***

**Corr. ID: 52 Organization:** Committee of 100 on the Federal City **Comment ID: 660700 Organization Type:** Unaffiliated Individual

**Representative Quote:** The new interpretive center should be a major benefit. We suggest that phone apps would be a flexible and cost-effective method for interpretation, education. The Aqueduct offers an opportunity for events, and events have been held at the Locks.

***VU/VE2000 - Visitor Use and Experience: Lighting***

**CONCERN STATEMENT:** (Concern ID: 60406) Commenters expressed the need for lighting along the towpath and suggested that any lighting be sensitive and unobtrusive.

***Representative Quote(s):***

**Corr. ID: 50 Organization:** City Wildlife, Inc. **Comment ID: 660568 Organization Type:** Unaffiliated Individual

**Representative Quote:** even when the design intent for the Canal project is to provide a lively and festive atmosphere, we recommend an environmentally sensitive lighting design that is based on the most current scientific research, particularly where LED lights are concerned.

***VU/VE2100 - Visitor Use and Experience: Active vs. Serene***

**CONCERN STATEMENT:** (Concern ID: 60405) Commenters both supported additional opportunities for active use of the park as well as discouraged altering or inhibiting the serene nature of the park.

***Representative Quote(s):***

**Corr. ID: 45 Organization:** *Not Specified* **Comment ID: 660471 Organization Type:** Unaffiliated Individual

**Representative Quote:** Limit the amount of visual or audible intrusion into the Canal experience. No audible engines, motors or mechanical humming.

***VU/VE2300 - Visitor Use and Experience: Bikes***

**CONCERN STATEMENT:** (Concern ID: 60418) Commenters suggested different opportunities for bicyclists.

***Representative Quote(s):***

**Corr. ID: 33 Organization:** *Not Specified* **Comment ID: 660236 Organization Type:** Unaffiliated Individual

**Representative Quote:** In considering any changes to the hiking/biking paths in this area, planners should recognize that high-volume bicycle traffic should be channeled along Water Street rather than onto the towpath.

***VU/VE4000 - Visitor Use and Experience: Towpath Improvements***

**CONCERN STATEMENT:** (Concern ID: 60407) Commenters express general support and suggestions for towpath improvements.

***Representative Quote(s):***

**Corr. ID: 38 Organization:** Chesapeake & Ohio Canal Association **Comment ID: 660275 Organization Type:** Unaffiliated Individual

**Representative Quote:** TOWPATH: We support widening the towpath through the cantilever solution (Alternative B) in areas of high use by park visitors. Simple restoration (Alternative A) should be sufficient in some less-used sections such as the north side above Key Bridge.

**VU/VE5000 - Visitor Use and Experience: Water Canal**

**CONCERN STATEMENT:** (Concern ID: 60408) Commenters expressed a desire to see water returned to the Canal and an emphasis on improving water quality.

**Representative Quote(s):**

**Corr. ID:** 46 **Organization:** Mr. **Comment ID:** 660475 **Organization Type:** Unaffiliated Individual

**Representative Quote:** I would urge that as much of Level 4 of the Canal be filled as soon as Spring comes - this means putting in a temporary dam in the Foundry Branch area. This will allow boaters (Canoes, kayaks, SUPs, rowers) and skaters to go upstream.

**VU/VE6000 - Visitor Use and Experience: Connectivity with the rest of the NHP and surrounding neighborhood**

**CONCERN STATEMENT:** (Concern ID: 60409) Commenters hope that the project will help connect the Georgetown portion of the Park with the surrounding neighborhood and the rest of the NHP.

**Representative Quote(s):**

**Corr. ID:** 73 **Organization:** Capital Trails Coalition **Comment ID:** 660965 **Organization Type:** Recreational Groups

**Representative Quote:** Developing the Mile Zero Marker as a gateway to the Canal is also an important part of encouraging use and promoting the economics of the area, bringing visitors to the park and supporting the businesses that surround this section of towpath.

**WV3000 - Wildlife and Vegetation: Nature and Biodiversity**

**CONCERN STATEMENT:** (Concern ID: 60414) Commenters expressed the desire to preserve natural resources within the park and supported opportunities to further enrich biodiversity.

**Representative Quote(s):**

**Corr. ID:** 12 **Organization:** *Not Specified* **Comment ID:** 660108 **Organization Type:** Unaffiliated Individual

**Representative Quote:** With every construction built, be it bike path or ramp, there needs to be greenery planted to offset the inevitable runoff and construction waste that will get dumped into the canal. We need more groves, more native species, more flower beds along the canal.