

## Proposed Revitalization of the C&O Canal: Position Statement of the Committee of 100

September 17, 2019

The Chesapeake and Ohio (C&O) Canal was declared a National Monument by President Dwight D. Eisenhower in 1961 to protect the then-neglected remains of the C&O Canal, its historic landscape, and many of its original structures. Congress "upped the ante" in 1971 and made it a unit of the U.S. National Park System. Today, the first mile of the federally-protected, 184.5-mile C&O Canal National Historical Park begins in and passes through Georgetown and, importantly, is where most Americans and foreign visitors will ever experience it first-hand.

In any effort to revitalize or "reimagine" the Canal, it cannot be forgotten that it is a National Monument and a unit of America's National Park System - no different from the Jamestown Island, Martin Luther King, Jr, National Historic Site, or Gettysburg National Military Park. Changes or revitalization must respect and not overwhelm the defining aspects and historic character for which it was memorialized. The C&O Canal is protected and managed by the National Park Service (NPS) on behalf of **all** Americans. As such, it is the property of the nation as a whole and not a local attraction that can be freely adapted, reimagined, or altered to better meet local interests.

The Committee of 100 on the Federal City is by no means, "opting to leave the Canal as is" as was recently claimed in the *Washingtonian Magazine*. If "as is" means in its currently neglected and dilapidated state, the assertion is ridiculous. What needs to be left "as is" is the nationally-significant historic elements and character of the original Canal: its locks, canal walls, much of the tow path, and the overall historic landscape – in short, those aspects that made the Canal a National Historic Monument in the first place.

The National Park Service's current concept plan for the Canal offers some excellent ideas, including restoring water to the Canal, restarting canal boat rides, adding a new visitor center, improved signage and interpretation, and grading the towpath for safety and better accessibility. The 1-mile Georgetown segment of the Canal most certainly can support changes or additions. But any approach to revitalizing it must be sensitive to protecting and not overwhelming the Canal's defining characteristics and historic integrity as a national park and National Monument. That is Job #1.

<sup>&</sup>lt;sup>1</sup> "Should We Revamp the C&O Canal in Georgetown? Why you shouldn't listen to the NIMBYs." Washingtonian Magazine. August 7, 2019

Each design element of the National Park Service's current concept when taken alone, appears appropriate. However, when taken cumulatively, it is simply "over the top." As a whole, the current proposal would have a significant and cumulative adverse impact on the Canal's historic integrity either through destruction of historic fabric such as the proposed demolition of near 190-year Canal old stone walls or through the proposed introduction of excessive recreational venues, boardwalks, or inappropriate landscape details. A similar finding was recently made in regards to this project by both the National Capital Planning Commission and the Commission of Fine Arts.

Balancing heritage preservation and ensuring continued relevance of so complex a historic site as the one-mile Georgetown Canal segment is difficult; we recognize that. A good case in point are the proposed changes to the historic towpath. In a recently completed study, the NPS itself identified it as a nationally significant and a character-defining historic element of the Canal. The report observed that the towpath retained high integrity and recommended that it be "preserved and maintained" as is - comprised of gravel, clay, and sand. 2 However, the NPS proposal appears to be considering "hard paving" it and changing its configuration in its entirety as a way to "improve" it. The towpath also figures prominently in the complex challenge of increasing disability access along the Canal. Doing so conservatively is the recommended approach and The Americans with Disabilities Act (ADA) policy seems to agree stating, " if following the usual standards would threaten or destroy the historic feature ..., alternative standards may be used."

Neither the ADA nor NPS policy nor the Committee of 100 minimizes the need to make the Canal more accessible to those with special needs. But a "one size fits all" or the same solution throughout the one-mile stretch is likely not a good choice – as is currently proposed by NPS. For instance, perhaps cantilevering the towpath only at the critical "pinch points" – rather than uniformly throughout is the better balance. Uniform grading the historic clay, sand, and gravel surface should be a preferred solution over hard paving.

The Committee of 100 shares the concern with others that the C&O Canal is in need of attention. Enhancing access and the ways the canal is experienced, interpreted, enjoyed and available for this and future generations is obviously important for its continued survival. But the proposed enhancements cannot come at the expense of preserving what is left of the original Canal or disguising or so overwhelming it to the point that visitors will not get a sense of what it was originally. A better balance is required. These are the basic tenants of the National Park Service itself in caring for all the historic and natural treasures in its care. The C&O Canal must not be an exception. Future generations are counting on us.

<sup>&</sup>lt;sup>2</sup> Georgetown Area: Cultural Landscape Inventory, Chesapeake & Ohio, Canal Historical Park National Park Service Plan by Elder and Weldon, August 2018 approved in 2018 both by the current park superintendent as well as the Washington, DC State Historic Preservation Office.

<sup>&</sup>lt;sup>3</sup> ADA, Title II Technical Assistance Manual - Covering State and Local Government Programs and Services, II-6.5000 Alterations to historic properties