

The Committee of 100
on the Federal City



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Mr. Kevin D. Brandt, Superintendent
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C&O Canal National Historical Park Headquarters
1850 Dual Highway, Suite 100
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January 5, 2018

RE: Section 106 Review Comments on the October 2017 *C&O Canal Concept Plan*

Dear Superintendent Brandt:

The Committee of 100 on the Federal City submits the following comments on the October 2017, *C&O Canal National Historical Park - Georgetown Canal Plan* (“Plan”). We do so under the rubric of Section 106 of the National Historic Preservation Act in our capacity as a Consulting Party.

We applaud the National Park Service’s, Georgetown Heritage’s, and The Georgetown Business Improvement’s interest in rehabilitating and increasing public enjoyment and access to the one-mile C&O Canal section in Georgetown. However, these laudable goals must not be achieved at the expense of the Canal’s historic character and significant constituent elements. Such appears to be the likely outcome in many of the Plan design alternatives and, if built, will result in significant adverse impacts to the Canal as defined under Section 106 (36 CFR Part 800 Protection of Historic Properties), National Historic Preservation Act (P.L. 89-665; 54 U.S.C. 300101 *et seq*).

The C&O Canal National Historical Park is a remarkable survival of our early Republic’s and the national capital’s industrial story. Though much changed in places, it is, by nature, industrial and gritty. Many of the Concept Plan’s proposals seek to inappropriately obliterate, tame, “improve on,” or redefine the very industrial character that the U.S. Congress mandated preserved for future generations as a unit of the National Park System. This is neither good historic preservation management nor approved management practices for a unit of the National Park System.

Criteria for determining adverse effects under Section 106 are quite specific as defined in 36 CFR Part 800.5. 800.5 also requires such actions to meet the appropriate Secretary of the Interior’s “Standards for the Treatment of Historic Properties” (36 CFR part 68). Few Plan alternatives appear to meet the Secretary’s “Standards” nor, for that matter, the NPS administrative requirements of [NPS-28: Cultural Resource Management Guideline](#).

Among the more concerning aspects are:

- Widening and resurfacing the historic dirt, mule towpaths thereby creating an appearance with no historic basis or precedent. Arguably, the water-filled canal itself and the towpaths are the two dominant and emblematic historic Canal remnants. The proposed towpath treatment turns them into something for which there is no historic basis and creates a false, overly-designed, historically-inappropriate appearance;
- Proposed new masonry construction throughout the Project Area for stairs, retaining walls, revetments, plazas, etc. appears in the renderings indistinguishable from the surviving, historic stone and brick masonry. This is contrary to NPS policies and professional historic preservation practices. There must be a clear distinction between historic material and new construction;
- The introduction of recreational boardwalks and patios is incompatible in material, design, and historic character use with the National Historic Landmark. While limited adaptive reuse and new additions within historic context are, of course, generally welcomed, the Plan proposals appear so pervasive as to have a negative impact on the overall historic character of the Canal; and,
- Widespread use of landscape perennial borders throughout the Project Area is inappropriate. Historically, The C&O Canal was neither a garden nor a recreational park. The proposed introduction of so many herbaceous borders, while undoubtedly popular and attractive, imposes a “vocabulary” and creates an appearance incompatible and, arguably, wholly out of the Canal’s historic character.

Acquired by the federal government from the B&O Railroad in 1938, designated a National Monument in 1961 by President Eisenhower, and brought into the National Park System in January 1971 by President Nixon, the 184.5-mile, Chesapeake and Ohio National Historical Park is, by statutory definition, **nationally significant**; its historic constituent properties and (importantly) historic character are nationally significant and are highest priority for protection – arguably none more than the Georgetown segment. We raise this given media coverage and discussions during recent consultation comparing favorably the Plan with the highly-popular New York City High Line. While both historic properties are remnants of America’s industrial heritage, there are significant and important differences which are being ignored in the current Plan and that call for widely different preservation/ adaptive reuse approaches.

As a **locally-significant** New York City historic property, greater latitude in rehabilitating the High Line was afforded that resulted in using the industrial remnants largely as a popular stage setting for innovative landscape designs and recreation. Here, historic preservation was not a primary driver or concern. In the case of the **nationally-significant** C&O Canal National Historical Park, historic preservation must be – given its national park status. Regrettably, it does not appear to be the case as evidenced by many aspects of the Plan.

We are very troubled by the proposed plan – particularly as the National Park Service appears to be an advocate and co-sponsor. The ideas underlying the various design alternatives show a disregard for the Service’s statutory and regulatory management responsibilities. A concept

plan that respects better the C&O Canal's history, the National Park Service, Congressional intention, and the nation's history is required.

I attach a compilation of addition comments or questions that provide greater detail of the points made above. If you have questions or require additional information, please do not hesitate to contact me.

Sincerely,



Stephen A. Hansen, Chair
Committee of 100 on the Federal City

Attachment

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ATTACHMENT

COMMITTEE OF 100 ON THE FEDERAL CITY COMMENTS/ QUESTIONS – C&O CANAL CONCEPT PLAN

EVALUATING THE DIFFERENT SECTIONS OF THE CANAL

The *Georgetown Canal Plan* divides the Canal between the Aqueduct on the west and the Zero Milestone on the east into eight sections. These sections have been used below to make comments, ask questions, etc. While the Canal Plan provides graphics and some text for each section, considerably more information is needed on existing conditions, what is proposed, and the reasons for the new proposals. It is important to be able to understand the existing conditions in each section, and what is proposed. In future reports, the Plan maps should be “continuous”, rather than the present arrangement where in some cases there are small gaps between different sections.

Towpaths and Mule Routes

The design of tow paths along the Canal is a critical issue and at least three alternative designs are proposed in the Canal Plan. This matter needs major consideration since a major alteration of the tow paths will affect the historic character of the Canal.

The span of the canal running from Georgetown to Harper’s Ferry consisted of a 16’-wide earthen bank, narrowing to a 12’-wide towpath on top along the river side of the canal. An earthen berm to contain the other bank of the canal provided a 7’-wide path on the top (see Figure 1).

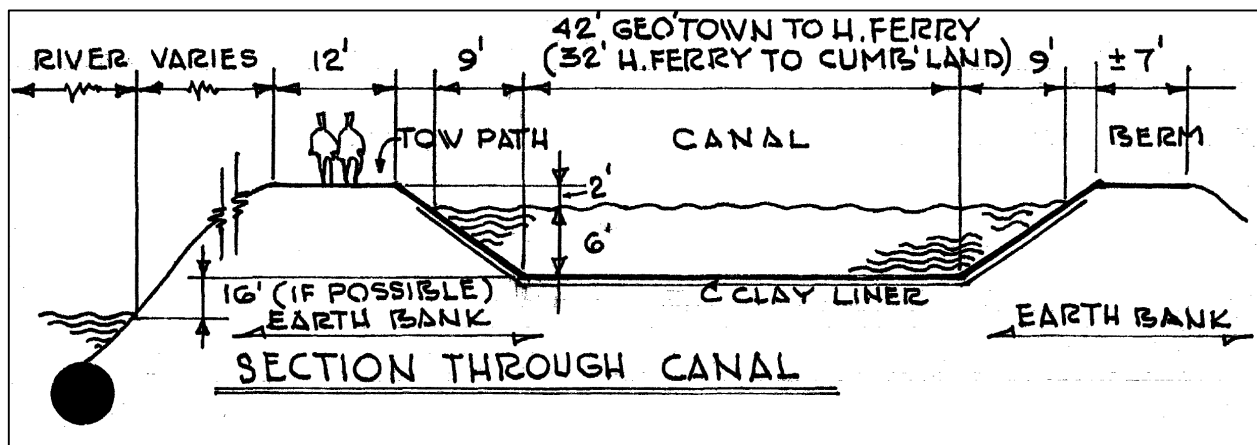


Figure 1. Cross section of the C&O Canal through Georgetown (National Register nomination, 1979).

From Georgetown to the Alexandria Aqueduct, a specified 12' towpath was on the berm (land side) of the canal, and at that point a bridge afforded access to the towpath on the river side of the canal for all the remaining miles. Throughout parts of Georgetown, over time stone walls and foundations abutted and/or encroached on the towpath, creating narrower traffic areas.

Obviously, some repairs, changes and improvements could be made to improve the use and safety of these walkways. However, some of the proposed improvements would appear to have a serious adverse impact on the historical character of the Canal.

The proposed Alternative A, while keeping the existing towpath width, proposes to add new material on top of the existing canal wall to stabilize it, as well level the path and resurfacing it (see Secretary of the Interior's *Treatment of Historic Properties* ("Treatment") Standards 5 and 6 and Rehabilitation Standards 6 and 9). Alternative B proposes applying a cantilevered edge over the canal wall, covering it, and extending the walkway over the canal itself. Both Alternatives A and C would alter the historic spatial relationship between the canal and towpath and make it impossible to distinguish the old from the new (see Secretary of the Interior's *Standards for Rehabilitation* ("Rehabilitation"), Standard 9). Alternative C proposes to widen the towpath by moving the wall further into the historic canal, thus narrowing the canal – a modification that would be irreversible (*Rehabilitation* Standard 10).

The towpath was specified to have a smooth, hard surface and surfacing was of crushed rock or whatever was available in the immediate area. This would have been either gravel, crushed stones ("Macadamized"), or simply dirt. Resurfacing the towpath with concrete or another material, as well extending the width of the path with what appears to be either granite or concrete slabs is introducing historically inappropriate materials.

The vegetative growth on top of the canal walls should not be ignored. It is a naturally occurring feature and undoubtedly appeared soon after the canal was opened in Georgetown. It is a feature of the canal landscape through Georgetown and has gained historic significance (see *Treatment* Standards 4 and 5). It also provides a natural safety function by delineating the area between the towpath and the edge of the canal walls.

Providing handicapped access is another important need that must be provided, but needs to be provided with great sensitivity.

The matter of "mule routes" along the Canal is also important. What routes will the mules follow to pull the future canal boat from "The Locks" on to the west? How far west will the canal boat be pulled (as far as the Aqueduct or beyond)? This decision has a number of influences on the design of the Canal.

Boardwalks

The addition of recreational boardwalks is incompatible with the industrial historic character of the Canal, both physically and materially. We assume that these may not have wooden decking, but a synthetic wood-like material, such as Trex™ to handle weathering and traffic? Additionally, the position of these boardwalks cantilevering over the canal would obscure both its width and views of the stone canal wall underneath the boardwalk.

The Aqueduct

The "Aqueduct" section of the Canal landscape extends from west of the Aqueduct to the 34th Street pedestrian bridge on the east. The key questions in this section seem to involve access to

lower levels (Capital Crescent Trail, etc.), the repair of the Aqueduct, how the Aqueduct is used, and the overall interpretation of this area. 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.

The one mile point on the Canal is somewhere in this area but does not seem to be clearly marked at this time. This One Mile Marker should be installed and highlighted so that visitors will have a sense of walking the first mile of the Canal (or the last mile of the Canal when walking from Cumberland).

The Bend

The “Bend” section of the Canal landscape extends from the 34th Street pedestrian bridge on the west to east of the 33rd Street Bridge on the east. On the north side are the rear elevations of buildings along Cady’s Alley and there are three major buildings on the south. It is not possible from the drawings to understand what exists now and what is proposed to be added. A rendering indicates an enhanced landscape on the south side of the Canal which may well detract from the historic character of the Canal.

The Walls

The “Walls” section of the Canal landscape extends from the point east of the 33rd Street Bridge to the Wisconsin Avenue Bridge. This is an especially important section of the Canal landscape. On the north, the Canal is bordered by the “Market House” (now occupied by Dean and Deluca) and the Georgetown Park complex (retail, office, residential). On the south, the Canal is bordered by the Canal House/Power Plant Building and several smaller buildings. Again, it is not possible to be sure what exists today and what is proposed.

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*).

The relationship of many of the walls to the canal is in part functional, helping to contain canal flooding, protecting abutting structures from flood damage, as well as providing foundations for buildings themselves. In many places, their height emphasizes the change in terrain towards the river and the depth of the canal. This “canyon effect” is both geographical and an historically-defining characteristic of the canal through Georgetown.

One proposed change (Alternative B) is a wide staircase from in back of the Dean and Deluca building stepping down to an intermediate level overlooking the Canal. This “dramatic” change is a major change from the more historical nature of the Canal in this section that exists today and certainly has to be viewed with caution. This type of “improvement” will have a serious adverse effect on the historic character of the Canal.

Also, proposals in both Alternatives A and B assume the removal of the entrance to the ramp that runs behind Dean & DeLuca into the Georgetown Park parking garage. With the removal of this ramp, how would the parking garage be accessed?

Further east, adjacent to the Wisconsin Avenue Bridge over the Canal, Alternatives A and B propose a “Wisconsin Cutout and Catwalk”. Unfortunately, neither the renderings, the plans or any descriptive text make it possible to understand what is being proposed

The Grove

“The Grove” section of the Canal landscape is a two-block section from the Wisconsin Avenue Bridge to the Thomas Jefferson Street Bridge. Changes appear to be relatively limited but, again, the graphics and “text” do not provide a clear idea of what is being proposed.

The Locks

“The Locks” section of the Canal landscape is a two-block section from Thomas Jefferson Street to 29th Street. The key first block section extends from Thomas Jefferson Street to 30th Street. This is the section of the Canal which is now closed off and undergoing massive reconstruction.

Again, the graphics, text and renderings fail to adequately indicate existing conditions and what is being proposed. Questions about two proposals should be noted. First, on the north side of the Canal between Thomas Jefferson Street to 30th Street, there is a park and “mule yard” indicated on what we understand is now Park Service property. On the drawing, the park appears very formal, with one part indicated as a mule yard. The mule yard would be very important and would appear to provide a certain sense (and perhaps smell) to this area. This does raise certain questions. Are the mules kept in a stable here overnight, or are they “trucked in” in the morning from somewhere else and “trucked out” at night. See questions below about the mules and the mule paths.

The second big question concerns the indication of a “Comprehensive New Visitor Center” in the historic Foundry Building on the south side of the Canal (the historic building is part of the larger “Foundry Building” complex. Having such a Visitor Center with adequate space for exhibits and orientation by National Park Service staff is very desirable. More information is needed about funding, how this would be obtained, etc.

Rock Creek Confluence, Rock Creek Park and Mile Marker ‘0’

The last three sections of the Canal landscape involve the Canal extending east from 29th Street to Rock Creek Park and then turning south around the West Heating Plant and extending on south to the Zero Milestone. There are questions about how to make this connection and several alternatives are shown. Further elaboration of these alternatives is necessary and, of course, eventually there will need to be discussion of the costs involved.

The character of the Zero Milestone area needs attention. Alternative A for example shows a very formal arrangement. It would seem desirable to have a more informal setting for the Zero Milestone, such as exists at present.

How to reach the Zero Milestone also needs attention. The present route in front of Thompson Boathouse has problems. Alternative A shows a path in back of the Thompson Boathouse. These access issues need to be explored more.

Finally, it is appropriate to note that the Committee of 100 on the Federal City has long championed completion of the “Washington Waterfront Walk”, the 11-mile walk and bike path from Georgetown to the National Arboretum. This concept was proposed in the 1997 Legacy Plan outlined by the National Capital Planning Commission. Now, 20 years later, much of path is in place, with only two major gaps to be filled in. It is important to consider how this path will connect with the C&O Canal in Georgetown, with the Georgetown waterfront (including Washington Harbor) and with other sections of Georgetown. This is a larger issue but it should be addressed as part of the Georgetown Canal Study.