

I appreciate this opportunity to express my personal views on the Non-motorized Boathouse Zone Feasibility Study for the Georgetown waterfront. My hope is that the study will aid the National Park Service in developing positive policies for the area. The following are my comments:

Protection of the C&O Canal National Historical Park is fundamental. About half of the zone under study lies within the C&OCNHP, which was created by Congress to preserve historical and natural assets for today's public and for future generations. The goals of the NHP include recreation, but the location, type, and scale of recreational facilities should be appropriate to the park's overall character. The canal park's mission of preservation must not be compromised by development that unduly promotes a particular type of recreational interest.

Low Density is the only wholly feasible scenario because it respects the C&OCNHP. Besides providing increased boating access outside the NHP at Sites D and E, the Low Density plan allows boating-related improvements within the NHP that are appropriate and desirable. Public launching of small craft would be facilitated by an added pathway on the upriver side of the Washington Canoe Club (WCC) within Site A, and by a new dock on the downriver side of the WCC at Site C. Such improvements need not interfere with the ability of non-boating park visitors to enjoy the Capital Crescent Trail (CCT) and views of the river, wooded shoreline, and the Alexandria Aqueduct.

The Medium Density Scenario is not feasible because it includes a highly impractical new boathouse at Site A. Such a structure would severely downgrade park visitor experience in the area. Although described as "in scale" with the historic WCC, the footprint of the new building would exceed that of the WCC, judging from Figure 22. The new boathouse would block views of the river and wooded shoreline for users of the CCT. It would greatly increase pedestrian and vehicular traffic along a section of the trail that is often very crowded by hikers, joggers, baby strollers, and fast-moving bicycles. Even if boaters were prohibited from using cars to bring their craft to the Site A boathouse, motor vehicles would be required to reach the building for maintenance and for fire safety. The first paragraph of the study's "Site Access" section on page 39 shows that this would mean widening part of the CCT to 20 feet, or constructing a parallel lane beside the trail. This required additional paving, and the proposed building itself, simply do not belong in this narrow space between the canal levee and the river.

The High Density Scenario would further damage the C&OCNHP by adding a large, intrusive storage building at Site C in addition to the new boathouse at Site A. The increase in crowding would be compounded by introducing this structure into an area that page 39 of the feasibility study correctly describes as a "Mixing Bowl" where multipurpose trails converge with vehicular traffic, resulting in safety concerns. This added rise in traffic would be the inevitable result of pedestrians and vehicles moving to and from a building that could hold as many as 85 multi-

person craft, according to page 54. It's hard to imagine how there could be enough room for the roundabout mentioned on p. 50 as a way to safely integrate this traffic, or that such a feature would be an enhancement. In any case, park visitors walking or biking upriver through the Alexandria Aqueduct's archway would be confined between the canal levee and a row of riverside buildings for almost the whole way to past Site A. From the canal towpath above, the existing view of the historic aqueduct and of the river would be partly obstructed by a double-bay storage facility, joined on its upper level to create an overall length of 225 feet.

Private intrusion into the C&OCNHP should be explicitly prohibited. The land exchange authority granted by the legislation establishing the C&OCNHP was intended for enhancement of the canal park, not for creation of new private enclaves within it, something that also violates NPS policy. The High Density Scenario's storage building at Site C would be designed to house team rowing shells and provided with a 250-foot dock, a layout not unlike a potentially private academic boathouse. The Feasibility Study should make clear that a private facility is not an option within the canal park.

Excellent opportunities for new boating facilities exist outside of the C&OCNHP. While High and Medium Density development is unacceptable upriver from the Alexandria Aqueduct, that does not necessarily apply to the downstream part of the Boathouse Zone. The best place for development within the zone is Site E, where a well-designed multi-story boathouse (or even two such structures) could improve the shabby existing cityscape. Site E also provides easier vehicular access than any other location in the zone. The boating capacity of Site D could also be enhanced, especially by using the space now occupied by three non-historic townhouses. Federal property in the downriver part of the Boathouse Zone need not be subject to the legal and policy restraints that rule out a land exchange involving the C&OCNHP. Completely urban in character, the downriver area is a patchwork of private and public ownership. Much of the property is under the jurisdiction of Rock Creek Park, but that land does not form part of a cohesive park environment.

Beyond the currently designated Boathouse Zone, other opportunities for increased boating access may be found downriver on both sides of the Potomac, as well as along the Anacostia. In considering all possibilities, NPS should remember that boating is only one of several forms of desirable recreation enjoyed by park users, and that scenic and historic preservation must be respected.

Sincerely,

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