May 29, 2021

Tina M. Cappetta, Superintendent
C & O National Historical Park
142 W. Potomac Street
Williamsport, MD 21795

Re: Capital Crescent Trail

Dear Superintendent Cappetta,

On behalf of the Coalition for the Capital Crescent Trail (Coalition), I am writing to you about the Capital Crescent Trail (CCT). The Coalition is a local, metropolitan DC area, community-based organization whose primary purpose is to preserve, protect, and improve the CCT. We have been performing this work for over 30 years and have helped to make the CCT one of the most popular and well used trails in America.

We want to share our concerns regarding the maintenance needs of the DC segment of the CCT, which is under the jurisdiction of the National Park Service (NPS). We understand that NPS is aware of the serious maintenance and repair needs of the CCT and that preliminary work is being done to evaluate these needs. This is very positive news, and we welcome this focus by the NPS on the CCT. We also appreciate the work that has been done recently to address the immediate erosion issues in the Palisades section of the CCT. However, there are many other outstanding maintenance issues on the CCT that are long overdue, are chronic, and are impacting the safety of trail users. We hope that the NPS can address them in an expeditious manner.

Our Coalition supports and encourages the following:

**Repaving and Widening the CCT:** The CCT is the most heavily used trail in the metropolitan DC area, by bicycle commuters and recreational users. It is in dire need of repairs and an update. Frequently overcrowded for its width and condition, recreational use and traffic increased dramatically during the pandemic. As the CCT has become more crowded, the likelihood for accidents increased, especially as trail users try to maintain social distance. The CCT has not been repaved in over 20 years. The asphalt has deteriorated, now having many bumps due to tree roots and subsidence. Due to its heavy usage, the CCT should be repaved to 12-14 ft in width, the AASHTO standard for heavily used trails. Currently, there are no shoulders on the CCT in DC. Adding shoulders of crushed stone on each side would help with drainage, alleviate crowding, offer more space and softer surface for runners and pedestrians, and mirror the CCT in Montgomery County. We urge the NPS to make repaving the CCT a priority, in coordination with the other repairs and improvements noted below.
Paving the Norton Street Path and Expediting the approved Arizona Avenue Connector to CCT. Improving these two paths requires coordination between DC and the NPS, because both have jurisdiction over the parts of these connections to the CCT. The need for improvements for these pathways was addressed in the attached January 6, 2021 letter (see page 2) from the Advisory Neighborhood Commission for DC’s Ward 3 to Jeffrey Marootian, who was then the Director of DC’s DOT (DDOT). The letter demonstrates strong community support for improving these pathways and urged expeditious action by DDOT to work with the NPS on both paths. When rehabilitation on the CCT takes place, these two paths would be logical access paths for a detour if the CCT needs to be closed. Paving these paths would also improve emergency responder access to the CCT, much closer than the only other existing access points in Georgetown and at Fletcher’s boathouse.

The Norton Street Path. The first access path begins as an unimproved relatively flat dirt path at the corner of Potomac Ave. and Norton St. NW, in the Palisades neighborhood. It travels parallel to the Dalecarlia Water Treatment Plant fence and gradually slopes downward to meet the CCT. It is one of only two access paths to the CCT from far NW DC, and as such is frequently used by pedestrians and cyclists as a link to the CCT from MacArthur Blvd. in NW DC. This path presents chronic serious safety issues whenever it rains. Water runs down the path, carrying mud and gravel which pushes out across the CCT. Last year a cyclist travelling up the trail slipped on the mud and was hospitalized for several days with broken bones and other serious injuries. More recently a runner slipped and fell on the mud as she was trying to stay on her side of the trail to avoid other users. Further, this path is not ADA compliant, making it impossible for persons with disabilities to access the CCT. Persons with strollers also have difficulty. Only skillful mountain bikers can bike it due to protruding roots, stones and gullies. We urge the NPS to work with DDOT to make paving this connector path the highest priority due to safety issues. See photo below of mud and gravel buildup that flowed from the Norton St. path onto the CCT in late December 2020. This buildup repeats despite being cleared multiple times per year.
Arizona Avenue Connection to CCT, also called Arizona Avenue Connector. The second access path is parallel to Arizona Avenue where it runs into Canal Road. In its current state, the pathway is dirt, very steep, narrow, and barely passable. In 2019, after public input, DDOT approved a project to pave this path. Since approval, the Coalition has been keeping in touch with DDOT staff for progress updates. The project is in the 30% design phase, but has been put on hold recently until ROW questions can be resolved with the NPS. We urge the NPS to work with DDOT to keep this project on track.

Manning Place Steps. Some years ago, a long set of wooden steps, with two gravel landings, was built by the NPS from Potomac Ave. NW near Manning Pl. NW, for trail users to access the CCT. The steps were built with a bike rail on the right side. These steps do not provide ADA access. The steps are now worn and the dirt landings are eroded, making the steps more difficult to use. Due to their high step height and steepness, it is virtually impossible for a child, senior, or anyone other than a very fit adult, to navigate the steps while pushing or carrying a bicycle. We ask the NPS to improve this accessway to the CCT.

CCT Erosion Issues below Potomac Ave. NW. Significant erosion on both sides of the CCT has occurred due to rainwater overflow down the embankment across from 5707 Potomac Ave. in the Palisades neighborhood of DC. The Student Conservation Association, working with the NPS, cleared
away the foliage to expose the extent of the erosion undermining the slopes on both sides of the CCT. This led to the realization that the rainwater on Potomac Ave did not flow to an existing drain on the street but was cascading down the embankment onto the CCT and then down the other side of the CCT towards Canal Road. The Coalition contacted DC’s Ward 3 Councilmember Mary Cheh, who organized a site meeting in October 2020 with representation from various stakeholders, including the NPS and DDOT, to sort out the problem. To address the immediate risk of a collapse of the CCT, the NPS has taken action to stop the erosion above and below the CCT by armoring the embankment and putting in a blanket of rocks to divert rainwater to a sewer drain adjacent to the CCT. New fencing on the west side of the CCT was also installed. We appreciate this action by the NPS to provide a short-term fix to the erosion problem. However, a long-term solution to the rainwater flowing down the embankment must be addressed on Potomac Ave. In December 2020, DDOT told us it has requested funding for FY22 to address larger issues with infrastructure on Potomac Ave, above the CCT. This will most likely need further attention by stakeholders, including the NPS, to make sure that the source of the erosion problem is corrected by DDOT. It may also require further work by the NPS.

**Tree trimming, Mud, and Clearing Trail Overgrowth:** We urge the NPS to set up a regular schedule of trimming overgrowth and trees adjacent to the CCT, and clearing mud and gravel from the trail. We appreciate the work done by the Student Conservation Association, and the recent tree trimming contractor. However, the tree contractors’ trucks which drove on the trail left deep muddy ruts along the trail edges, and muddy ridges extending 2 ft into the trail. We ask that the NPS require its contractors to remediate these areas before they leave. We receive many requests from trail users to have the overgrowth onto the trail trimmed, which is making the usable trail narrower and narrower, both at ground level and above. Having the crushed stone shoulders, mentioned above under Repaving and Widening the CCT, would impede overgrowth and help prevent muddy ruts and edges, which can be safety hazards for users. See photo below of one of many muddy ruts after tree trimming.
We appreciate the opportunity to work with you and the NPS regarding this very important trail. We would welcome the opportunity to meet with you or one of your colleagues via Zoom or other method.

Yours truly,

Tony Marra, Chair
Coalition for the Capital Crescent Trail (CCCT)