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**Federation of Citizens Associations  
of the District of Columbia**

**ORGANIZED MARCH 5, 1910 • INCORPORATED JUNE 3, 1940**

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June 15, 2006

**VIA FAX**

Mr. Kevin Brandt, Superintendent  
C&O Canal National Historical Park  
1850 Dual Highway, Suite 100  
Hagerstown, MD 21740-6620

RE: Georgetown University Boathouse

Dear Mr. Brandt:

On February 1, 2006 the Federation of Citizens Associations of the District of Columbia (Citizens Federation) urged the National Park Service to conduct a full Environmental Impact Statement of the proposal to consider alternative locations for the proposed Georgetown University boathouse (and other boathouses planned for the waterfront) outside the national historical park on more accessible, already developed/degraded land, with technical, environmental and practical advantages for everyone, including university, high school and public boating programs. The C&O Canal National Historical Park is a national, regional, and local treasure. The draft Environmental Assessment ("EA") is seriously flawed, and shows the need for a full Environmental Impact Statement ("EIS").

The Federation has over 45 association members from across the City, representing thousands of DC residents who depend upon the ability to use and enjoy our National Parks and Historic landmarks. The EA is clearly insufficient because of the severity of the adverse effects on nationally-important historic resources and National Parks, including the C&O Canal Historical Park, the Georgetown Historic District, and the Capital Crescent Trail, resulting from a structure of this size at this location.

We endorse the comments of the Committee of 100 concerning the procedural and substantive failings of the EA. The need for an EIS is demonstrated by these failings.

This project also has the aroma of a special deal for a powerful university, making a full EIS an even more important step (which is also required by the law). The EA notes that NPS proposes to allow easement across the C&O Canal National Historical Park, the Capital Crescent Trail, and the Potomac Gorge for the boathouse. These sites demand protections against harm after the proposed transfer of the boathouse site.

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And the access is not just to allow rowers to hand carry 60 foot shells across these environmentally sensitive sites. Georgetown University is already advertising the capacity for alumni or University "family" to rent the boathouse facilities for private social activities. We can already see the Ridgewell's catering trucks lining up for deliveries for wedding receptions, as well as the valet parking for the guests. The adverse environmental impacts are not difficult to foresee, yet they are totally ignored in the EA. NPS should have clarified the controls it would require as part of the transfer in order to protect both this site and the surrounding historic assets, and studied their environmental impact.

There is no good reason not to require a full EIS for this site – and every reason, both legally and practically, to require one. We urge NPS to meet its obligations and provide a full EIS.

Sincerely yours,



George R. Clark

President

Federation of Citizens Associations of DC

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cc: Hon. Eleanor Holmes Norton