

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
HISTORIC PRESERVATION OFFICE  
OFFICE OF PLANNING



June 9, 2006

Kevin Brandt, Superintendent  
Chesapeake and Ohio Canal National Historical Park  
1850 Dual Highway, Suite 100  
Hagerstown, Maryland 21742

Dear Mr. Brandt:

Thank you for the copy of the draft environmental assessment for the proposed Georgetown University boathouse. Our comments touch upon the contents but are more generally focused upon the entire process of discussion of the project and its review in accordance with Section 106 of the National Historic Preservation Act.

In June 2004 email correspondence with Sally Blumenthal of the National Capital Region office, she wrote that it was the intention that, after a July public meeting that year, the Park Service, in cooperation with our office, would “identify formal ‘consulting parties’ which would obviously be groups. Then a group could be represented by an alternate individual. Then, we’d set up a third meeting in late July with the formal consulting parties to receive their comment.” At the time, she suggested that “Georgetown University, Potomac Boat Club, Environmental Law Institute, Washington Canoe Club, C&O Canal Association, Coalition for Capital Crescent Trail and perhaps others” would be consulting parties.

We accept that the timing of Section 106 consultation is up to the lead agency (as long as the project has not yet commenced) and so certainly have no objection to the hiatus since late 2004/early 2005. It takes as long as it takes. And we have no general objection to combining Section 106 consultation with the NEPA review, but we fear that the two may not yet have been sufficiently combined. In my experience with combining NEPA and NHPA review, the latter sometimes suffers for it. Environmental assessments are typically formulated to present specific options (whether all of the options are seriously considered or not) to the preservation consultation instead of allowing the consultation to help create the options. The options then frequently take on a life of their own and often prove themselves resistant to the sort of modification that frequently results from consultation.

We do appreciate the Park Service’s candor in identifying one of the options as preferred. We also appreciate that that particular option reflects a reduction of the proposed building’s height to within compliance with the 1997 Memorandum of Agreement between the Park Service, our office, and the Advisory Council on Historic Preservation. Of course, such an agreement acknowledged and was occasioned by a perceived adverse effect or effects to be created by the construction of the boathouse. As the assessment acknowledges, the present preferred design has met one of the quantified limitations set forth in the MOA, but has not met the other, namely it exceeds the total area of the building’s footprint, and for this reason, we must consult.

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Thus far, I have no indication that consulting parties have been further sought or identified. The assessment does address some considerations of views and neighboring historic resources, but does not commence with a clear idea of or proposal for an area of potential effects. Now, that may not strictly be required by NEPA, but it is a fundamental concept for 106 review and makes more clear subsequent discussions of potential effects.

While we may be skeptical of some comparisons between the proposed site and that of Tract 102-109—because of the latter’s topography, insufficient access and infrastructure, the apparent narrowness of the site, and its distance from the university—our focus is upon only the proposed site and the nearness of dimensions of the proposed boathouse to those agreed in the MOA. To that end, we recommend Section 106 consultation as soon as feasible.

In the meantime, a couple of additional drawings would be helpful to our understanding of the project. The assessment presents plans of each of the building options and also contains lists of the floor areas for each of the spaces or uses. While some of these spaces are identified or at least obvious as depicted in the plans, other spaces are not identified. I would appreciate a set of plans that detail these. In addition, it would be helpful to have a graphic illustrating the proposed site plan relative to the formerly and presently proposed western boundaries of the waterfront park, at 1155 and 1250 feet west of Key Bridge, respectively.

Sincerely,

Tim Dennee  
Architectural Historian