

June 13, 2006

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

Re: Georgetown University Boathouse Environmental Assessment (EA)

Dear Mr. Brandt:

The League of Women Voters of the District of Columbia (LWVDC), part of a national nonpartisan organization, believes wise decision-making provides protection of areas of critical environmental concern, historical importance and aesthetic value. The undeveloped parkland along the Potomac River at the gateway to the C & O National Historical Park deserves such protection. Thus the LWV of the District of Columbia supports the no action alternative proposed in the Georgetown University boathouse EA, at least until a full environmental assessment is completed.

The League supports full review of environmental, social, and economic impacts of major public and private developments. We reiterate our previous two written requests to the National Park Service (NPS) to conduct a full programmatic Environmental Impact Statement (EIS) for the Georgetown University boathouse proposal. (See enclosed documents.) The technical comments and criticism received to date by the NPS from numerous community groups and individuals regarding the proposal already fill many pages. Such controversy immediately qualifies the proposal for a full EIS according to National Park Service NEPA guidelines.

The recently released Environmental Assessment (EA) has numerous omissions and misrepresentations.

Foremost, the EA does not address the negative impacts and precedence of building a private boathouse of incompatible scale to surrounding buildings on public parkland. District of Columbia historic review guidelines do not allow structures of the scale of any of the boathouse alternatives.

The NEPA process requires analysis of cumulative impacts. The EA fails to adequately address a discussion of combined impacts of other boathouses proposed for the river. The use of this public land should be coordinated in a comprehensive review with current and future proposals with impacts to boaters, hikers, bikers, and auto traffic.

In addition, the EA does not provide a hard look at the proposed alternatives to adequately explain why they are inappropriate. Nor does the EA question or review the facility requirements Georgetown proposes.

Our board of directors reviewed this issue at our last meeting June 7, 2006. We heard the report of our environmental chair, who attended the May 22 presentation of the Environmental Assessment document. The report's citation of outdated, and inauthoritative resources is a fundamental flaw. Such a document cannot carry the weight of this important decision.

Grace Malakoff, President

May 6, 2003

Zoning Commission of the District of Columbia 441 4th St., NW, Suite 210 Washington, DC 20001

Dear Members of the DC Zoning Commission:

Re: Georgetown University land swap and boathouse proposal Case No. 02-30

The League of Women Voters, a national non-partisan organization, works to promote the public interest at national, regional, state, and local levels of government. The League takes action by addressing governmental bodies when League members reach agreement or consensus on an issue. The League of Women Voters has strong positions at the local and national level supporting the preservation of open space and unique natural features of the city. Without a doubt, the undeveloped area along the Potomac River, west of the Key Bridge provides a valuable resource to our city as open space in an urban setting. As the Georgetown Waterfront Park & C&O Canal National Historic Park Plan states, Above Key Bridge is one of the main scenic treasures of the Nation's Capital.

Because the League believes in full public review of the environmental, social and economic impacts of major developments such as the Georgetown boathouse proposal, we ask that you not rezone the property tonight. Instead we recommend proceeding with completion of an Environmental Impact Statement (EIS). The 1995 Environmental Assessment (EA) is outdated and was not an assessment of the specific proposal before you. A new environmental review is an appropriate means of addressing issues with full opportunity for citizen participation. These issues include but are not limited to:

- details on the full scope of the current proposal which were apparently unavailable for the 1995 EA.
- impact on users of the C&O Canal, Capital Crescent Trail and neighbors
- impact on historic sites
- direct and indirect effects on the water quality of the Potomac River
- alternative sites which may be more desirable at this time
- mitigation measures

- assessment of the number of vehicle trips per day and per week for boathouse activities

An EIS would address the many concerns of neighbors and boaters, as well as bikers and hikers on the C&O Canal and Capital Crescent Trail and other citizens who treasure this urban open space. Since the proposed development would permanently remove public parkland from our national park system, result in loss of wetlands, and impact views of this historic area, we urge that you defer this decision until a new environmental review of the proposed development is available.

Sincerely yours,

Frances Gemmill
President, League of Women Voters of the District of Columbia