

June 15, 2006

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

Re: Draft Environmental Assessment - Georgetown University Boathouse

Dear Mr. Brandt:

Just over fifty years ago, development in the form of a highway threatened the Potomac River waterfront and C&O Canal. In March 1954, Supreme Court Justice William O. Douglas, a member of our Audubon Naturalist Society, led editors of the Washington Post and other dignitaries on a walk along the 185 mile canal. A press campaign ensued, the public's attention was captured, and shortly thereafter the C&O Canal National Historical Park was established.

Today, development in the form of the proposed Georgetown Boathouse again threatens this national treasure. The Audubon Naturalist Society endorses many of the fine comments submitted on the Environmental Assessment by esteemed groups such as The National Parks Conservation Association, The C & O Canal Association, Sierra Club, Potomac Conservancy, the Committee of 100 on the Federal City and myriad others who have taken the time to review and critique the EA. Again, our overarching concern is that the National Park Service should not be in the business of transferring public parkland for private institutional use.

Following upon the Dan Snyder clear cutting debacle, this proposal has caused many to lose faith not only in the National Park Service and its governance but in the integrity of the review process as well.

Time and again, the NPS has been urged by countless groups and individuals to undertake a full Environmental Impact Statement ("EIS") of the Georgetown Boathouse because of the significant negative impacts which would result from this proposal. Instead, the Environmental Assessment we are given to review is flawed and entirely insufficient in scope. Indeed, it reinforces the perception that, as in the Snyder case, the NPS is again bowing to pressure from powerful interests.

First, the EA does not consider a full range of viable alternatives. It fails to assess other sites long offered by a broad spectrum of stakeholder groups. Indeed, the EA's choice of Alternative C, the larger footprint, (which contradicts your 1997 MOA), leaves no doubt in our mind that the NPS is capitulating to Georgetown University's desire not

just for a rowing facility but a clubhouse and event venue for private fundraising.

The fact that this enormous structure would dwarf the historic Washington Canoe Club "diminishing the integrity of the site in setting, association, feeling, visual impact..." as cited in the National Historic Preservation Act, seems to be ignored in your review. The EA's conclusion that this structure would be consistent with the development history of the park, contradicts much of expert testimony given over the course of the review process.

Audubon's central mission is protection of our region's remaining natural treasures. The enormous footprint of the proposed facility would have significant environmental impacts, destroying a section of forested tidal floodplain and having significant hydrological impacts on the C & O Canal embankment. The boathouse as proposed, would also obscure the entrance to treasured natural areas for thousands of recreationists and visitors: the C&O Canal National Historical Park, the Capital Crescent Trail and the Potomac Gorge.

We are also concerned with the cumulative impacts of congestion, safety and traffic issues at the busy gateway site and adjacent area during the construction, maintenance and servicing of the private boathouse. The hauling of boats on 60-ft. trailers along a narrow, popular recreational and commuter trail presents a logistical nightmare.

NEPA, the National Environmental Policy Act, requires an EIS when a federal action would have "significant impact on the human environment" Therefore, we strongly urge the National Park Service to conduct a full Environmental Impact Statement that will seriously consider alternative locations, sizes and uses outside the Park.

Sincerely,

Dolores Milmo
Conservation Advocate
Audubon Naturalist Society