

# NATIONAL PARKS CONSERVATION ASSOCIATION

*Protecting Our National Parks for Future Generations*

June 15, 2006

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

via fax 301-739-5275

Dear Mr. Brandt:

Thank you for the opportunity to comment on the draft Environmental Assessment (EA) for the proposed Georgetown University boathouse on C&O Canal National Historical Park (NHP). The following comments are submitted on behalf of the nonpartisan National Parks Conservation Association (NPCA) and our more than 325,000 members nationwide. As you are aware, NPCA has many concerns about Georgetown University's proposal to take established public parkland at the eastern gateway of this popular national park for a private boathouse.

The C&O Canal NHP provides local residents as well as visitors from around the nation and the world with opportunities to explore the best remaining example of the canals that once were used to move goods between the then-western frontier and established communities along the Eastern seaboard. The park today is also a great place to bird, hike, bike, and observe wildlife. The park provides necessary recreational open space, in addition to its mission to protect priceless natural and historical resources. With the passage of time, C&O Canal NHP continues to become even more valuable as multi-use public parkland.

Unfortunately, the draft EA fails to answer many of the questions and concerns raised in NPCA's January 21, 2005 scoping comments, and those raised by other concerned organizations and individuals throughout this process. If the National Park Service (NPS) continues to consider this proposal, its review of the proposal's potential construction and operational impacts on the park's natural and historical resources and on the experience of the park's approximately 3,000,000 annual visitors must be more fully analyzed in an Environmental Impact Statement (EIS).



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The National Environmental Policy Act requires an EIS when a federal action would have “significant impact on the human environment” (NPS Director’s Order #12). There is no question that the proposed development would have significant impacts on C&O Canal NHP. Moreover, while the draft EA acknowledges that it is not intended to satisfy the NPS’s obligations to comply with under the National Historic Preservation Act, NPCA is concerned that the NPS has released the draft EA without having completed even the basic steps in the Section 106 review process.

The absence of Section 106 review plus the limited analysis presented in the draft EA makes it difficult to determine on what basis the draft EA concludes that the boathouse would have only a minor impact on historic setting (including the Capital Crescent Trail) at C&O Canal NHP (IV-12). For example, the draft EA fails to assess potential flood-related impacts to the canal embankment. Table 3 in Appendix P shows potential flow velocity increases of 40-100 percent at the proposed boathouse location. While the draft EA considers potential flood damage to the proposed Georgetown University Boathouse, and to the existing Washington Canoe Club, it does not consider potential damage to the canal embankment resulting from the increased pressure and velocity as floodwaters are constricted between the boathouse and the canal embankment. With the Potomac River flooding on average every 12 years, this is a potentially significant and serious consequence of boathouse construction for which the draft EA fails to provide analysis. An EIS should include a flood damage simulation conducted by the U.S. Army Corps of Engineers, including damage protection measures for all of the potentially impacted historic structures in the area, not just for the new building.

In the same section, the draft EA references earlier developments along the canal, and concludes that the proposed boathouse would be consistent with that development history. Due to its disproportionate size compared to the primary visual reference point – the Washington Canoe Club -- the boathouse in fact would appear as a modern intrusion when viewed from the Potomac River, the George Washington Memorial Parkway, or other vantage points.

The draft EA fails adequately to consider all of the available alternatives to construction of a private boathouse on land that is currently within the C&O Canal NHP. An EIS should include analyses of other potential sites, including in



partnership with other boathouses being planned downriver of this controversial proposed site on public parkland.

According to the draft EA, the size of the proposed boathouse is driving this controversial location. The size of the facility is driven in part by inclusion of indoor rowing facilities, and space for special events, neither of which are water-dependent activities, and should be reconsidered by the applicant. The only collegiate boathouses in the country of comparable size are those of Harvard University, and of Princeton, which shares its space with the U.S. national rowing team. Reducing the size of the proposed boathouse could conceivably resolve the conflict by allowing serious consideration of less controversial sites.

The proposed use of parkland by the university for its boathouse is driven by its ownership of an upstream parcel within the boundaries of the park, and its proposal to trade its private land for public land near the park's gateway in the District of Columbia. While the draft EA references potential impacts to park resources from potential development on the upstream parcel if the trade does not go forward, it is impossible for the public to make an informed judgment about the site's real development potential and its consequences based on the limited information in the draft EA.

In conclusion, the draft EA fails to provide sufficient information to allow the NPS to make an informed decision in this matter. If the NPS continues to consider this proposal, its review of the proposal's potential construction and operational impacts on the park's natural and historical resources and on the experience of the park's approximately 3,000,000 annual visitors must be more fully analyzed in an EIS.

Thank you for considering our comments.

Sincerely,

Joy M. Oakes, Director  
Mid-Atlantic Region

