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Washington, DC 20016
June 14, 2006

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

Dear Mr. Brandt:

Re. Georgetown University Boathouse Environmental Assessment: "No Action" Alternative D

I. Introduction:

On behalf of Defenders of Potomac River Parkland, I am writing to express our strong opposition to the Georgetown University (GU) boathouse proposed for the C&O Canal National Historical Park.

The Defenders is an alliance of 22 member organizations that support the preservation of the undeveloped shoreline and the riparian zone of the Potomac River between Key Bridge and Chain Bridge. The member organizations are:

American Canoe Association, American Hiking Association, American Whitewater Association, Audubon Naturalist Society, Canoe Cruisers Association, Citizens Committee to Save Laurel Lakes, C&O Canal Association, Coalition for the Capital Crescent Trail, Dupont Circle Conservancy, East Coast Greenway Alliance, Friends of the Earth, League of Women Voters of DC, Montgomery Sycamore Island Club, National Parks Conservation Association, Potomac Appalachian Trail Club, Potomac Conservancy, Potomac Heritage Trail Association, Potomac Pedalers Touring Club, Rails to Trails Conservancy, Sierra Club-DC Chapter, Washington Canoe Club and Western Lands Project.

In addition to the Defenders group, the following organizations are also opposed to the current GU boathouse proposal: C&O Canal National Historical Park Advisory Commission, the DC Federation of Citizens Associations and the Advisory Neighborhood Commission (ANC3 D) – whose neighborhoods border almost the entire length of the undeveloped DC-section of the C&O Canal Park.

For three years, the Defenders have called upon the National Park Service (NPS) to conduct a comprehensive Environmental Impact Statement of the entire waterfront area to address the needs of all recreational groups and to seriously consider alternative locations, sizes and uses outside the Park for new boathouses planned for the waterfront. (See attachments A and B for examples of a letter and testimony.)

We believe that the GU boathouse would harm the Park while diminishing the visitor experience to the narrow, fragile, busy, wild and scenic entrance to the Park. We also believe that the potential consequences to the area during and after construction of the boathouse would be devastating and impossible to mitigate.

In addition, we believe that three of the four alternatives described in the GU boathouse EA would have an unacceptable impact on the Park, the Capital Crescent Trail, the Potomac Gorge, the Potomac Heritage Trail, the Canal towpath, the American Discovery Trail, the Potomac River shoreline, two historic structures (including the Canal embankment), the surrounding area and the river itself, an American Heritage River in the nation's capital.

Finally, we believe that the GU boathouse proposal meets all of the criteria for doing a comprehensive EIS, as set forth in DO-12, the NPS Handbook used by NPS decision-makers when

determining whether an impact may be significant. Therefore, we endorse Alternative D, the “No Action” alternative.

II. Significant impacts and alternatives:

The current EA fails to adequately discuss many significant impacts and alternatives, such as:

A. Significant Impacts:

1. Destruction of a section of wooded tidal floodplain from the construction of a building almost the length of a football field at the narrow and fragile entrance to the C&O Canal National Historical Park, the Capital Crescent Trail and the Potomac Gorge, and the setting of a precedent for future development in the Park.

- This proposed action is contrary to the Capper-Cramton Act, the NPS Organic Act and the Georgetown Waterfront Park Plan.

- Loss of scenic and wild parkland in an urban setting is a significant impact.

- The damage to the C&O Park would be irreversible.

- The EA has no plan to mitigate or avoid the damage that would be done.

- Has the Park Service Horticulture Advisory and Review Committee reviewed the proposal and offered an opinion?

2. Congestion, safety and traffic issues at the busy gateway site and surrounding area related to the construction, maintenance and servicing of the private boathouse, as well as the delivery of boats on 60-ft. long trailers along a narrow, popular recreational and commuter trail.

- The EA refers to the potential traffic issues on the river, and even includes the Potomac River Safety Committee's map showing the race course areas for the different boating groups, but provides no analysis of the significant impact of the proposed action. And there is no mention of the impacts to shoreline boaters from the proposed 75-ft. dock extending out into the river, blocking the shoreline route of boaters. Nor is there analysis of the impacts on paddlers and rowers, who face in opposite directions while operating their boats, or the potential impacts while launching and maneuvering different types of boats that are in close proximity to one another.

- Even more important, the EA fails to include an analysis of traffic or safety issues on the Capital Crescent Trail, despite the addition of trucks and trailers and cars and rowers all sharing the same narrow, fragile Park entrance and recreational corridor. During regular training and regatta weekends, the impact to the already congested area would be significant and potentially dangerous. Clearly, if NPS decides to pursue this misguided proposal, they should require an extensive safety analysis of the CCT area impacted by the GU boathouse proposal since the “safety” of park visitors is one of the most important values of the NPS.

- What is the expected impact along the narrow CCT from the introduction of a new group of athletes, their coaches, their family members, their classmates and visitors during regatta weekends? Wouldn't it be a significant impact if excited rowers, or trucks or trailers ever collided with a biker or another trail user? Surely, NPS can find a better way than to support private development of this busy public recreational corridor.

- The EA provides no plan to mitigate or avoid the damage that would be done along the narrow recreational corridor.

- Has the Park Service Safety Director reviewed the proposal and offered an opinion?

3. Potential impacts on nearby historic properties (Washington Canoe Club and Canal embankment).

- The EA acknowledges that the GU boathouse would be located next to the historic Washington Canoe Club and the Canal embankment, but it fails to consider the significance of the impact on the two structures during and after construction of the proposed boathouse and during floods.

- The EA provides no plan to mitigate or avoid the devastation that might occur.

4. Significant impacts on the scenic area from the Key Bridge, the George Washington Memorial Parkway, the Towpath, the Potomac Heritage Trail, the American Discovery Trail, the Potomac Gorge.

- Alternatives A, B and C as described in the EA would have significant visual impacts on the C&O Park and surrounding area, even though the preferred alternative shows a reduction in height of 14.5 ft. over the original plan. It is astounding that NPS dismisses as insignificant the impact of an enormous building almost the length of a football field at the gateway entrance to one of the crown jewels of the entire National Park System and the busy and popular CCT! Clearly, NPS should require further analysis if they are determined to carry out this foolish plan.

5. Hydrological impacts to the area during floods (historically significant along the Potomac River waterfront).

- The EA contains a flawed hydrology report which does not adequately address the significant impact to the Canal embankment during floods.

- How would NPS mitigate the damage that would result from a breach in the Canal embankment/levee, and/or the destruction of the historic Washington Canoe Club?

6. Direct and indirect impacts on the natural resources, floodplain and wetlands at the site of the proposed private boathouse.

- Almost 30% of the site proposed for the GU boathouse consists of wetlands. The EA states that the Corps of Engineers "believes" the wetlands are caused by the leaking Canal and therefore the wetlands are considered to be artificial. Regardless of the source, wetlands are wetlands, and does it make sense to build on any type of wetlands – especially when they are within a national historical park and next to a fragile levee?

- Will the Corps of Engineers do follow up studies to determine the source of water in the wetlands? Maybe the source of water is from rain? Is the Corps of Engineers concerned about the possibility of a leaking levee?

- Is there a plan to mitigate the loss of wetlands?

- If the Canal is leaking, where would the water end up after construction of the enormous boathouse? Wouldn't the new building, almost the length of a football field, act as a barrier/dam and restrict the flow of water seeping from the Canal to the river? Would the water leaking from the Canal end up on the Capital Crescent Trail?

- The EA acknowledges that the construction of structures on a floodplain increases flood heights and velocities, and increases flood hazards in areas beyond the flood. That being the case, why would NPS consider building any structure on the undeveloped floodplain?

- Has the Park Service Horticulture Advisory and Review Committee reviewed the proposal and offered an opinion?

7. Cumulative impacts on river and land from the construction of three proposed boathouses in the vicinity of Key Bridge related to current and future rowing program needs.

- The EA fails to recognize the significant cumulative impacts from the proposal.
- The EA mentions three new boathouses (GWU, GU and Arlington Cty.) but fails to mention a public boathouse planned for a site next to Jack's Boathouse. What has become of the only new public boathouse proposed for the Georgetown waterfront? Is it no longer part of the Georgetown Waterfront Park Plan?
- The EA under "Land Use" recognizes that a GU boathouse would extend the defined recreational uses from the GU boathouse to the Thompson Boat Center (TBC), and admits that public access to the waterfront would be increased – especially during regatta events when increased use of the two collegiate boathouses would occur. NPS then concludes that the cumulative traffic levels would not increase significantly! The EA states that similar "traffic levels" already occur for GWU and GU-related regatta events at TBC, but the EA fails to mention that currently the trucks and trailers and rowers enter TBC by way of Rock Creek Parkway and not by way of K/Water Sts. The route for the trucks and trailers accessing the two proposed collegiate boathouse would be by way of K/Water Sts. and the Capital Crescent Trail! This serious oversight requires further analysis.
- The EA fails to recognize the cumulative impacts on the river for current and future rowing programs, including the impacts from additional motor boats associated with coaching and rescue operations during training and regatta events.

8. Value of Park gateway site relative to land proposed for an exchange.

- The GU holding upriver is unbuildable so the rationale for the swap is undermined.
- The public is not aware of an appraisal of the properties proposed for the exchange.
- The swap has not been analyzed in light of the Georgetown Waterfront Park proposal. This is segmentation and/or an example of failure to consider cumulative impacts.
- The EA contains no meaningful examination of other, better alternatives that would not negatively impact the C&O Park.
- There is no detailed analysis of degradation of park resources under the preferred alternative.

9. Potential impact on shoreline boaters from a 75-ft. long private dock extending out into the river.

- The EA fails to acknowledge the significant impacts on shoreline boaters from a long dock extending out into the river.
- The EA does not address the impacts from paddlers mixing with rowers in the launching area and WCC race area.
- The dock proposal would not be analyzed until after approval of the boathouse, contrary to the best interests of the public.

10. Potential impacts on public health during and after construction of the boathouse if the corroding 84-inch diameter sewer line which runs underground at the site is ruptured.

- A rupture in the 84-inch diameter (corroding) sewer line would have significant impacts on natural and recreation resources, as well as on the general public, including boaters and CCT users.

- A thorough engineering study is required to analyze the potential impacts during and after construction.
- The EA contains no mitigating plan to avoid the damage that would occur.

11. Public controversy generated by the proposal.

- The consequences from the GU boathouse would be significant, and therefore very controversial.
- Ever since the true size of the GU boathouse was revealed to the public three years ago, the controversy over the location, size and use for the GU boathouse has grown dramatically.
- The EA fails to assure the public that the GU boathouse is technically, environmentally and practically a good idea. On the contrary, the faulty analysis and lack of serious consideration of alternatives makes clear the need for a comprehensive EIS of the entire waterfront area.
- The Park Service should consider doing a River Management Plan for the lower Potomac Gorge that will insure that the increased usage of the multiple projects planned for this resource is achieved for the benefit of all users and of the river itself, not just of GU.

12. Process

- The people who registered with NPS to be notified about the release of the EA were not informed until May 18, if at all, rather than April 25, the date of the release of the EA for public comment.
- The Park Service has failed to ever consult ANC3 D and C&O Canal Association – both of whom are interested parties -- about the GU boathouse proposal.
- The public has not had an opportunity for a hearing on the current proposal.
- The EA fails to adequately address the impacts to historic resources at the proposed site, incorrectly concluding that impacts to historic resources would be minor.

13. Other comments

- The EA states that a precedent has been established at the boathouse at Fletcher's Cove and the Washington Canoe Club for allowing a privately-run recreational use on public parkland along the Potomac River. This statement is misleading: both boathouses pre-date the establishment of the Park and both rent the land from the Park Service, unlike the plan for GU which privatizes both the land and the use of the facility. Has NPS considered a lease arrangement with GU and GW for land along the waterfront?
- The EA fails to state how trash would be removed from the GU boathouse: would garbage trucks access the site by way of the CCT?
- It is unclear in the EA how the sanitary sewer line would connect to the GU boathouse (currently there is an inactive 48 inch diameter sanitary relief sewer nearby). NPS should require more analysis if they decide to support this inappropriate plan.
- The "feasibility study" referred to in the EA for the boathouse proposed for the GU-held site upriver does not exist.
- The images of Alternatives A, B and C (from the river and from along the CCT) presented in the EA are misleading: in the view from the river, the upriver wing of the building appears to be significantly smaller than the downriver wing of the building; in the view from along the CCT, the upriver wing is not even visible, apparently "hidden" behind the curve in the CCT (even though the sketch of the footprint reveals a straight

edge to the building at the CCT side of the structure). This type of misleading images was used in gaining some official approval of the GU boathouse "concept" in recent years, and also during the DC Zoning Commission hearing three years ago.

B. Alternative Locations, Uses and Sizes:

1. 34th St. and Water/K Sts. (East Side) - A private Georgetown University boathouse, next to the proposed George Washington University boathouse, on more accessible, already degraded land in need of redevelopment. At this location, GU could sponsor boating programs for other groups in the community -- unlike at the "encumbered" C&O site, where zoning restrictions prohibit broader use of the \$15-17 million facility because of the fragile, bottleneck location along Capital Crescent Trail, a busy public recreational and commuter corridor.

- The EA dismissed this alternative without considering the technical, environmental and practical advantages of the location. This alternative should be reconsidered as part of an EIS of the entire waterfront.

- The EA dismissed this alternative for the wrong reasons: First of all, it based the need for more space on the program needs of the GU rowing teams, not the public needs to protect the C&O Park from private development, or the need for public boathouses. Secondly, it failed to consider raising the roof to allow for more space, and to consider modifying the bulkhead to allow for easy launching. (Note – NPS plans to modify the bulkhead at Wisconsin Ave., adding steps leading down to the water. Why not modify the bulkhead in the same manner at 34th St. for boat launching purposes?)

2. 34th St. and Water/K Sts. - (West Side) - A Georgetown waterfront "universal" boathouse for private and public use, instead of two separate private university boathouses on the constricted waterfront and a third (still unfunded) public facility. The boathouse could include a public viewing stand (on the roof!) and other public amenities. This alternative offers many land use, environmental, practical, financial and community benefits.

- Why did the EA not consider this alternative? It was proposed in the scoping session, and it offers many advantages to everyone while protecting the C&O Park from private development. This alternative should be seriously considered as part of an EIS of the waterfront area outside the Park.

3. Thompson's Boat Center - Use university funds to upgrade/expand this public boathouse that needs repairs, where GW and GU are now housed, and increase the storage capacity by building several smaller boathouses (and launching areas) in the 34th St.-Key Bridge area.

- This alternative requires further analysis as part of an EIS.

4. Anacostia River - Multiple locations on degraded land in need of redevelopment. American University rowing teams are based there.

- AU students find a way to travel to the Anacostia River for their rowing programs. Why not GU students?

- This alternative, and others, require further analysis as part of an EIS.

5. General comment about alternatives:

- The EA failed to seriously consider alternative locations for the GU boathouse outside the Park. Instead, the size and location for the GU boathouse were based solely on the "programmatic needs" of one group of collegiate rowers and not the "public needs" referred to in the NPS Organic Act, the Capper-Crampton Act and the outdated Georgetown Waterfront Plan. None of the above-mentioned documents considers

Georgetown University's private "programmatic needs" as a reason to build inside the C&O Park. And none of the documents provide for consideration of private ownership of public land.

III. Miscellaneous **comments about the GU boathouse proposal as further reason to endorse Alternative D, the "No Action" alternative**

1. Even the Georgetown Waterfront Commission Boathouse Task Force recognized as early as 1997 that the site proposed for the GU boathouse was a bad choice. (The Committee found that the site was "not feasible" because of "lack of access through the current bike path; sewage, water and utilities access; would shorten the 'natural' area of the trail; interrupt paddling activities . . . a racing course used by the WCC for almost 100 years." (See Appendix C as further endorsement of the "No Action" alternative.)
2. Why did NPS dismiss the (smaller) GU boathouse alternative suggested by Congressman Bartlett? (See Appendix D as further endorsement of the "No Action" alternative.)
3. How can NPS proceed without a comprehensive EIS when (1) the Georgetown Waterfront Plan of 1987 calls for a 4,000 sq. ft. public boathouse site (See Appendix E) not an 18,682 sq. ft site as proposed in the EA for all of the alternatives except the "No Action" alternative, and (2) the non-motorized boathouse zone showing the zone extends only 1,000 sq. ft. west of Key Bridge has never been officially changed (See Appendix F). This is further reason to support the "No Action" alternative.
4. Why did NPS dismiss former Superintendent Doug Faris' comments years ago about the height of any boathouse proposed for the gateway to the C&O Canal Park (See Appendix G)? This is further reason to support the "No Action" alternative.
5. Why did NPS endorse the biggest boathouse on the East Coast for GU, placing the private needs above those of the public without proper analysis and comparison of other collegiate programs (See Appendix H)? This is further reason to support the "No Action" alternative.

IV. **Conclusions:**

NPS should endorse the "No Action" alternative for the GU boathouse EA, and conduct a comprehensive study that will (1) determine the needs of all recreational groups, (2) assess the impacts to the area, and (3) seriously consider alternative locations, sizes and uses outside the C&O Park for all new boathouses. A better boathouse plan is possible – a plan that will protect the C&O Park from private development, provide boathouses for university, high school and public groups at more accessible locations outside the Park, and ensure a safe and enjoyable experience for visitors to the Park and the waterfront. An EIS of the entire waterfront outside the C&O Canal Park will show the way!

Sincerely,

Sally Strain
DC Resident (Palisades) and
DC Coordinator, Defenders of Potomac River Parkland
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Attachments A-H