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**June 11, 2006**

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

Re: Georgetown University Boathouse (ID: 15645)

Dear Mr. Brandt:

I strongly oppose the Georgetown University proposal to build a boathouse in the C&O Canal National Historical Park ("Park"). The boathouse would do serious harm to the Park without adding any benefit. Given the alternatives presented, I recommend the "no build" alternative.

Prior to approval of this proposal, an Environmental Impact Statement ("EIS") should be done, not only for the proposed boathouse, but also of the entire Georgetown waterfront area as part of a comprehensive study of the recreational needs of this area. The many negative environmental impacts as well as the significant public controversy the proposal causes alone should make the need for an EIS obvious.

Additionally, there needs to be a serious consideration of alternative locations, especially outside the Park, such as expanding the public Thompson's Boat Center; building a public (or private) boathouse at 34<sup>th</sup> St & K St. (East and West sides); and building the boathouse on the Anacostia River (both the District of Columbia and NPS have recognized the need to develop recreational uses for this area).

The draft Environmental Assessment is woefully deficient. It fails to adequately discuss many significant impacts, such as:

1. Direct and indirect environmental impacts on the natural resources, floodplain and wetlands at the site of the proposed private boathouse. For example, a) Destruction of a section of wooded tidal floodplain from the construction of a building 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; b) Hydrological impacts to the area during floods (historically significant along the Potomac River waterfront).
2. 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.

3. The setting of a precedent for future development in the Park.
4. 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. trailers along a narrow, popular recreational and commuter trail.

As to the proposed land swap between the Park and Georgetown University, it is certainly improper and outside the scope of authority of the Park. To the extent that the Park has authority to swap its existing property for other property not currently owned by the Park, surely it is necessary to satisfy three conditions: 1) the property being traded is not needed by the Park; 2) the property being obtained is needed by the Park; and 3) the property being obtained should be at least as valuable as the property being traded. None of those conditions is satisfied by the proposed swap.

A better boathouse plan is possible that will protect the C&O Park from private development, provide boathouses for the university, high school and public groups outside the Park, and ensure a safe and enjoyable experience for visitors to the Park and the waterfront.

Sincerely yours,

John H. Wheeler