



**Chesapeake & Ohio Canal Association**  
**6415 79<sup>th</sup> Street • Cabin John MD 20818**

May 11, 2005

Don L. Klima, Director  
Office of Federal Agency Programs  
Advisory Council on Historic Preservation  
Old Post Office Building  
1100 Pennsylvania Avenue, NW, Suite 809  
Washington, DC 20004

Dear Mr. Klima,

The Chesapeake & Ohio Canal Association, along with the Washington Canoe Club and the Capital Crescent Trail Coalition has been one of the interested parties concerning the proposed Georgetown University Boathouse and has been named as such in the zoning process and the abortive Historic Review 106 Process held last summer by the National Park Service. We have also been instrumental in forcing the initiation of the current Environmental Assessment being undertaken by the NPS as a result of a court filing pointing out that there has been no appropriate environmental review of this project as required by NEPA. As an indicator of the public's concern, more than 100 people showed at a scoping session for the Environmental Assessment.

As part of the Environmental Assessment process there will be a new Section 106 review. We have asked for consulting party status, but there has been no indication of any acknowledgement. If NPS is not adequately involving consulting parties, I ask that the Advisory Council on Historic Preservation become involved in the consultation, since the NPS' apparent refusal to involve consulting parties suggests that the undertaking has substantial public controversy and the Council's involvement could help resolve this issue over the adequacy of the NPS's public involvement efforts. See 36 C.F.R. Part 800, Appendix A.

This entire project, from the beginning, has been characterized by a lack of effort by the National Park Service to involve the greater community that has a stake in the C&O Canal National Historical Park. If the NPS had asked the C&O Canal Association in 1997 what it thought was appropriate on the proposed location from a Historical and Cultural perspective it would have been substantially smaller than the 15,000 square feet and 40 feet tall that the NPS previously concluded (with no consulting parties) was appropriate. A building the size originally proposed in the 1987 Waterfront Plan (4,000 SF and same height as the Washington Canoe Club) might possibly be acceptable, but not having the public substantially involved is not. Now that the process has been forced open, we ask that the ACHP would use its influence to petition Fran Mainella, Director of the National Park Service to require that the historical review be fair and

open to the public. This project has the potential for setting some undesirable precedents for the Park and it should be approached in a way that is more than just barely legal. Certainly, the previous process in 1997 was conducted in a nonpublic manner, and many of the protests could have been avoided had it been. It would also help if meetings were not scheduled one day after a major holiday, such as last year on July 5, so that there is no appearance of trying to make it difficult for individuals to testify.

Sincerely yours,

Frederick I. Mopsik  
Chairman, Environmental Committee

Cc:Fran P. Mainella