



Western Lands Project

P.O. Box 95545 Seattle, WA 98145-2545
(206) 325-3503 / fax (206) 325-3515
www.westernlands.org

Kevin Brandt, Superintendent
C&O Canal NHP
1850 Dual Highway, Suite 100
Hagerstown, MD 21742

January 15, 2008

SUBJECT: Scoping comments on GU Boathouse EIS

Dear Superintendent Brandt:

The Western Lands Project is a non-profit, public-interest organization that works to keep public lands public. We scrutinize both administrative and congressional land exchange and sale proposals. While our work is concentrated mainly in the West, we are interested in virtually any proposal that would relinquish public lands. We do not oppose any and all land trades and sales, but work to make sure that these projects adhere to laws and regulations and serve the public interest. We are also dedicated to supporting citizens' involvement in such projects through the National Environmental Policy Act (NEPA).

We commented on the EA for this project and urged the Park Service to complete an environmental impact statement (EIS) for the boathouse proposal. Concurring with our colleagues in Defenders of Potomac River Parkland ("Defenders"), we now urge your agency to undertake a comprehensive EIS that covers management of the waterfront area and its many uses (including passive use).

In the scoping letter for this project, the Park Service makes two references to boathouses having historically been located in what is now the boathouse zone. With all due respect to history, historic uses, and those who promote them, we do not believe the Park Service can rationalize construction of this or any other boathouse in the C&O Canal NHP on the basis of the uses that have occurred or been planned for in the past. Once the impacts of various alternatives have been analyzed, it may be that what was planned for in 1986 is no longer appropriate, and that the area cannot sustain further development of this type.

As I stated in comments on the EA, I visited the C&O Canal NHP two years ago while on a work-related trip to the capital, and I was particularly impressed by the solitude the towpath and canal area offered, even in proximity to a freeway and a congested urban neighborhood. If it were my choice, the sensory and visual refuge of the canal would take precedence over all other qualities and uses.

In the EA, the urban, developed features of the area were strongly emphasized throughout the document, giving short shrift to natural and scenic features. In the EIS, the Park Service needs to do a much better job of acknowledging and analyzing potential impacts on these qualities from ongoing development and/or management in the entire waterfront area (again, as part of a comprehensive EIS for the waterfront).

The EIS should consider a new range of alternatives for location of a GU boathouse. Again, we concur with the Defenders' comment that alternatives outside the C&O Canal NHP must be considered. The boathouse EA dismissed several alternatives from consideration because

they would not meet the preferences of the GU rowing program. It is unlikely that the Park Service can compel GU to accept a boathouse location it doesn't like, but it is fundamental that any proposal involving public land must serve the public interest. The no-action alternative may be the best choice.

Should your agency decide to proceed with the current exchange and GU boathouse proposal, one aspect of the land exchange that must be examined is impact of privatization in the project area. It is striking how consistently the current EA treats the boathouse as though it were proposed for private land. While there is substantial discussion of the parcel's relationship to other land uses in the area and to various overlapping land use plans, there is no discussion of the parcel as a piece of public land that is part of a larger area of public land.

The EIS should include a detailed map of and discussion regarding the ownership configuration in the project area. How many private inholdings does the NHP encompass, and where are they located? How much private land lies within the boathouse zone? Are there long-term plans to trade all public land in the boathouse zone for private land elsewhere? How many, if any, actions that privatized public land have occurred within the boathouse zone since its designation and within the NHP since its creation? What other exchanges are planned in the project area in the future?

The EIS should discuss the potential public interest of retaining the trade parcel in public ownership. It should also provide a substantive discussion of the actual potential for the GU parcel to be developed, since forestalling such development was declared to be a main impetus for the exchange.

The current EA mentions that George Washington University plans to build a boathouse on what is now Park Service property within the boathouse zone, but no details are offered about the timing of that project or the cumulative impact of the GWU boathouse in conjunction with the GU boathouse. This is a reasonably foreseeable project that needs to be part of a cumulative impact analysis. GWU has already purchased two buildings it plans to trade to the Park Service, which suggests that some planning must have been done for the project. Yet even without detailed design information, the Park Service can and should analyze the cumulative land use and land ownership impacts of the GWU project combined with the GU project.

Finally, as a member group of the Defenders, we endorse the comments offered in the group's January 13 letter in regard issues/impacts, alternatives, and process.

We look forward to reviewing an EIS for this project that corrects the deficiencies in the NEPA analysis, takes a broader look at management of the waterfront area, and examines alternatives that would better serve the public interest. Thank you for the opportunity to participate in this decision-making process.

Sincerely,

/s/

Janine Blaeloch
Director