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Washington, DC 20015

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Mr. Kevin Brandt, Superintendent
C&O Canal National Historic Park
1850 Dual Highway, Suite 100
Hagerstown, MD 21742

Dear Superintendent Brandt,

I appreciate the opportunity to comment on the scope of the environmental impact statement (EIS) the National Park Service (NPS) has decided to prepare on the proposed land exchange and Georgetown University boathouse. I am glad that NPS decided to proceed with an EIS. I was unable to attend the meeting in early December, but I have reviewed the materials from that meeting now posted on your website. I offer the following general comments and hope that the NPS will address them as you prepare the draft EIS.

I would like to let you know that I regularly observe the activities on the river and trails in the area under discussion. I had two daughters whose high school crew teams rowed out of Thompson Boathouse and lost their boat storage area to the Swedish embassy. I agree fully with the assessment of most of the DC rowing community that the city and region need additional facilities for the rowing public. I am a frequent user of the Capitol Crescent Trail for cycling and walking. As a long-time volunteer with the Coalition for the Capitol Crescent Trail, I conducted a user survey on trail use at the Georgetown terminus. More than 225 cyclists and others per hour used the trail on multiple occasions that I counted use on summer mornings. This trail gets heavy use throughout the day, especially on weekends. Interfering with that outstanding recreational resource during construction and on regatta days if a Georgetown University (GU) boathouse is constructed upstream of Key Bridge will seriously threaten recreational experiences of many trail users.

1. Scope of the EIS alternatives in the information is too narrow

Federal NEPA regulations require federal agencies to identify the scope of issues to be analyzed in an EIS during the scoping process (Sec 1501.7). Part of that process is to inform federal decision-makers about reasonable alternatives that should be considered in the EIS.

The information posted on the NPS website indicates that NPS is narrowly focusing on variations of the property exchange with GU and the construction of a GU boathouse. These alternatives are too limited. The NPS should expand the scope of the EIS to evaluate and assess the need for multiple recreational activities, including adequate boathouse facilities, to serve river-based recreation in the DC and Georgetown region.

The parcel GU owns is undoubtedly more valuable to NPS in its current natural condition than developed. I question whether GU could obtain necessary permits to develop that land, which lies within the floodplain. The EIS should thoroughly evaluate the development potential of the GU parcel and compare that to land proposed for the exchange.

2. NPS should consider additional alternatives

As part of the expanded consideration of alternatives, the NPS should include the following new alternatives as part of the study:

Alternative 1 – Build one GU - GWU boathouse: Consider building one new rowing facility that GU and George Washington University and the public (including local high schools) could use. Thompson's Boat Center, a public facility built, is an excellent model.

Alternative 2 – Place GU and GWU boathouse next to each other: If NPS decides it is important and necessary for two private universities to build their own collegiate facilities, with private ownership of the waterfront land, then consider placing the collegiate boathouses next to each other, at 34th/Water Sts. or at another accessible site outside the C&O National Park.

Alternative 3: Upgrade and expand Thompson's Boat Center: Instead of building boathouses in the Key Bridge area, and trading waterfront land to private interests, encourage GW and GU to pay for an expanded/updated Thompson's Boat Center and keep land under Key Bridge in the public domain for launching of boats and storage purposes only. NPS has many other options available to it to allow special use permits for collegiate facilities on its land. It should explore those in the EIS.

The Potomac River offers exceptional recreational opportunities. Since NPS owns and manages almost all of the Potomac shoreline in DC and Virginia upstream of the 14th Street Bridge, this EIS provides NPS an unparalleled opportunity to consider its mandate to provide a variety of recreational opportunities in National Parks.

Thank you again for preparing an EIS on the opportunities to increase public recreation access to the Potomac River in DC. I look forward to seeing how you modify the initially- proposed alternatives in the draft EIS. Please send me a copy of the DEIS when you complete it.

Sincerely,

David Cottingham