

**AMBER L. JONES
128B N. BEDFORD STREET
ARLINGTON, VIRGINIA 22201**

January 8, 2008

Mr. Kevin Brandt
Superintendent, C&O Canal National Historical Park
1850 Dual Highway, Suite 100
Hagerstown, Maryland 21742
NCR_Georgetownboathouse@nps.gov

Re: SCOPING COMMENTS ON EIS - Georgetown University boathouse proposal, NPS project 15645

Dear Mr. Brandt:

Please include the items below in the scope of the Environmental Impact Statement on the proposed Georgetown University Boathouse on the Potomac River waterfront.

ADMINISTRATIVE ISSUES

1. Consistency with regional riverfront open-space planning efforts.

Whether the proposal is consistent with local and regional planning efforts to set aside land adjacent to the Potomac and Anacostia Rivers as open green space.

2. National Park Service role and precedent

Whether NPS, as the nation's steward of much of the Washington-area riverbank, is acting consistently with its mission of balancing preservation of property of national significance with broad public use.

The precedent that would be set in transferring a NPS-protected historic national property from the public to a private entity. How would this affect NPS response to other requests from private entities that would like to live in a historic protected home, or build on a scenic section of protected national park?

Whether the proposal is consistent with the legislative intent and history for the C&O Canal National Historical Park, the Capper-Crampton Act, the National Historic Preservation Act, and the Georgetown Waterfront Park plan itself, and what is legally allowable for a land swap.

Whether the evaluation and opinions of the C&O Canal National Historical Park Advisory Commission, an official body established by Congress to advise on matters affecting the C&O park, have been adequately considered.

3. Comprehensive evaluation of cumulative impacts of meeting regional need for boathouses

Whether the 20-year old boathouse plan is obsolete, given the many changes since then in use of the Capital Crescent Trail, construction of Georgetown Waterfront Park, and increased needs for boathouses in the region.

Whether the needs of local universities and high schools are best served by the existing alternatives.

Whether the proposal sets a precedence of encouraging additional establishment of private facilities for boathouses on public land.

The impact of George Washington University's publicized plan to follow Georgetown University's lead of negotiating with the National Park Service for a land swap.

The cumulative impact of transferring publicly owned national parkland to private schools/universities for more than one private boathouse use, in terms of precedent, economic and administrative issues, and the NPS role in preserving national parks.

The impact of addressing each need (Georgetown, George Washington, and American Universities, Arlington County High Schools, DC High Schools) separately as opposed to preparing a comprehensive study, boathouse plan, and EIS for the Washington, DC, region.

The cumulative environmental, social, economic, and safety impacts of all boathouses proposed for the Georgetown waterfront vicinity.

3. Public vs. private ownership of boathouses.

Whether the proposal favors a private interest at the expense of the public interest. The "Purpose and Need" section 1.3-1.4 of the EA introduced Georgetown University's needs only while short-changing those of taxpayers, the general public, national park users, tourists visiting the area, recreational boaters on the Potomac, and other regional boating programs.

Whether NPS, by retaining the land and building multi-use public boathouses comparable to Thompson's Boathouse in Georgetown, can meet the growing need for high school and university rowing programs while ensuring the land and buildings and associated wildlife habitat are kept in a manner consistent with their designation as national park property.

The possibility that preservation and public use of national parkland can co-exist with meeting boathouse needs.

4. Land swap

Whether there are credible economic, societal, technical, or environmental reasons for taxpayers to relinquish ownership of a historically significant, economically valuable, prime expanse of urban green space that gets heavy public use, in favor of a less valuable plot of land upstream of dubious value for public use.

An appraisal of the value of the upstream parcel of land owned by Georgetown University in comparison with the value of the downstream parcel in the park proposed for exchange. The claim in section 1.8 of the EA that "there would be no change in economic activity or loss of revenue" is unsubstantiated.

Whether construction of a boathouse on the upstream land owned by Georgetown University, and an access road, is technically feasible and desirable. The EA states that Georgetown University will not build a boathouse at its upstream site, and there is no evidence presented in the EA to demonstrate that construction at the upstream site and an even longer access road (than a road to the downstream park site) would pass NEPA review and zoning review, that construction permits would be granted, and that the easement to the upstream site is valid for construction of such an access road.

ALTERNATIVES

1. Alternative proposals

The alternative of the US Government retaining the deed and making any new boathouse available to the public, or at least to a broader cross-section of schools, in order to ensure that preservation and public activity will continue to co-exist on the alternative sites.

The alternative of a smaller size boathouse for Georgetown University. Georgetown University's boathouse architects stated at Thompson Boat Center in summer 2004 that other boathouses they surveyed around the country were not as large as the proposed GU boathouse sizes of 15,000-19,000 square feet. Only one in Wisconsin is larger, and it is used by multiple teams for multiple sports. In a July 21, 2004 letter to me, Congressman Jim Moran of Arlington, Virginia said that "Georgetown's proposed boathouse structure....would be the second largest collegiate boathouse in the nation...."

The alternative of providing only boat storage and launch facilities at the riverfront and locating additional training equipment elsewhere on campus, including chlorinated rowing tanks.

The alternative of not building new boathouses to be built on publicly owned national parkland, but instead forcing the regional schools/universities to use privately owned land on the Potomac or Anacostia River.

The alternative of one large universal boathouse modeled on Thompson's boathouse, to meet all regional rowing needs (instead of two private and one public boathouses).

The alternative of condemning or purchasing upstream parcel of land owned by Georgetown University for inclusion in C&O National Historical Park.

Whether there are credible economic, societal, technical, or environmental reasons for taxpayers to relinquish ownership of a historically significant, economically valuable, prime expanse of urban green space that gets heavy public use, in favor of a less valuable plot of land upstream of dubious value for public use.

2. Alternative locations

Locations on K Street on the east and west sides of 34th Street, which offer better accessibility and parking and fewer destructive environmental impacts because the land is previously developed and not vegetated.

Location on K Street where Jack's rentals and private townhouses now stand, east of Key Bridge, which offers better accessibility and parking and fewer destructive environmental impacts because the land is previously developed and not vegetated.

Locations on the Anacostia River.

Locations on the Virginia side of the Potomac River, where a boathouse has already been studied and evaluated.

Co-locating the three proposed boathouses in any of these areas vs. separating them as currently proposed for consideration in the EIS (with Georgetown University's boathouse potentially being way upstream inside C&O park).

Mitigation measures to address the public controversy generated by the proposed location within C&O Canal National Historical Park, as demonstrated by the opposition from the federally appointed C&O Canal National Historical Park Advisory Commission, non-profit C&O Canal Association, National Parks Conservation Association, Sierra Club of DC, Audubon Naturalist Society, Friends of the Earth, League of Women Voters of DC, and more than two dozen other citizen, conservation, and neighborhood organizations.

3. Legally enforceable restrictions or conditions to ensure long-term preservation of the property's national significance.

Whether the federal government, as owner of the sites being considered, can retain the right to protect and preserve the features that prompted the property to be designated a national park-- including physical, biological, cultural, recreational, and historical features – even if the land is transferred to private ownership.

PHYSICAL, BIOLOGICAL, CULTURAL, RECREATIONAL, AND HISTORICAL ISSUES

1. Physical destruction and erosion due to flood.

The destruction of permanent and/or intermittent wetlands and whether this is in accordance with national policy and permitting processes.

The current and future ability of the floodplain to absorb floodwaters and combined sewer overflow.

The effect of the removal of riverside vegetation, which naturally slows and absorbs floodwaters, on floodwater speed and patterns.

The effect of squeezing floodwaters into a narrow corridor between the boathouse and the George Washington Memorial Parkway on water speed, flow, and pattern, and potential damage to C&O Canal and other historic structures. A hydrologic study by the Corps of Engineers would be appropriate.

The effect of current and future floodwaters on riverbank and riverbed shape and silting characteristics.

The discrepancy in the EA claim that the C&O canal and towpath will experience "no" additional flood impacts due to this boathouse, which is contradicted in the EA itself, Table 3, which shows the flow velocities of floodwaters reaching the canal embankment will increase 40-100% adjacent to the proposed new building.

Mitigation measures for protecting the building and surrounding historic features and structures, all within the 100-year floodplain that the building is proposed to occupy. (The EA addressed mitigation for the building itself only, not for the surrounding historic features and structures.)

2. Water pollution.

The effect of removal of the riparian buffer between the C&O Canal and Potomac River in favor of pavement and other impermeable surfaces, and the resulting change in disposition of oils, chemicals, and drain overflows from the roads in the vicinity.

The potential for more surface algae and water surface vegetation due to changes in flow around the building and dock.

The potential for hazard in case of floodwaters reaching the proposed chlorinated rowing tanks within the boathouse.

The overall effect on river water quality.

3. Removal of wildlife habitat along the riverbank.

The impact of removing vegetation in and along the river that provides habitat for fish, ducks, beaver, muskrat, herons, egrets, other birds, small mammals, and deer.

Whether there are native and/or unique species of fish and wildlife that would be disturbed.

4. Reduced wildlife-related recreational activities.

The reduction of recreational activity associated with viewing fish, aquatic birds, aquatic mammals, and shore birds, and fishing.

5. Destruction of plants and plant diversity.

Whether there are native plant and tree varieties unique to the riverbank that would be disturbed.

Whether the desirable diversity of local plant and tree species would be threatened by the removal of vegetation.

6. Physical destruction and erosion of riverbank and riverbed due to construction.

Whether heavy construction equipment could threaten the stability of the riverbank in the vicinity. An engineering study would be appropriate.

Scouring of the riverbank and river floor due to construction of building and docks, and resulting changes in water flow; potential silting and need for dredging.

7. Change of the character of the historic property and national park setting.

The cumulative impact on the historical and cultural features of the C&O corridor, intended to be preserved by designation of a national historical park, and the full range of threats to the historical and cultural features and structures, including physical and floodwater damage, social and economic values, and public use.

Threats to the scenic, pastoral character of the riverbank by replacing the trees, wildlife habitat, and wildlife with brick and concrete, large boat trailers, and increased human activity.

Whether the requirements of Section 106 for an assessment of the appropriate size of a boathouse for every alternative, and consultation with DC, Maryland and Virginia State Historic Preservation Offices, have been adequately addressed.

8. Introduction of visual and audible elements that diminish the integrity of the national park setting and historic properties.

The change in view from both sides of the river and from the river itself. How the focus of park users' attention would change when the current pastoral setting of open green space is replaced with a modern building and associated human activity.

The impact of night-time lighting of the boathouse and potential interference with the view of the historic Washington, DC, monuments and memorials now clearly visible when lit up at night, from the Virginia side of the river.

The noise (cheering, shouting, and buzzing of machinery) in the national historical park compared with its current state.

The proposed sizes in proportion to the sizes of the existing and previous historic structures, including the Washington Canoe Club and Potomac Boat Club. To my knowledge, the two building sizes currently being proposed in the EIS are larger than any historic structure that previously existed in this corridor.

9. Navigational hazards for motorized and non-motorized boat traffic.

The impact on use of the narrow river corridor between Rosslyn and Georgetown by non-motorized recreational kayakers and canoeists.

A study of current and projected uses and usable size of the water passage at different times of year. A Coast Guard or other appropriate authority should be consulted regarding the safety hazard.

The safety hazard of a permanent dock and long and awkward rowing shells entering the water in this narrow corridor.

10. Navigational hazards for hikers and bikers and other users of riverside trails.

The current and projected use of Capital Crescent Trail and potential for collisions with boathouse construction, repair and maintenance equipment and boat trailers.

The current and projected use of C&O Canal towpath and users entering and exiting in vicinity of boathouse.

The cumulative impact of the use of a new access road, including the motorized vehicles of crew members and spectators, the boat trailers carrying large, unwieldy boats, the boats carried on the shoulders of crew members -- all of which could potentially tangle with the hikers, bikers, roller bladers, baby strollers, and fishermen on the trails.

The EA's claim that traffic on the access road would have "minimal impacts to the trail users, because the access road would be separate from the CCT, and most deliveries would occur during non-peak periods of trail use" is contradicted in the EA itself, which presents a list of the 2005 Georgetown University boating season events, all of which occur during peak periods of CCT trail use -- Saturdays and Sundays.

The additional impact on C&O park and CCT trail users of vehicular traffic and congestion caused by the shuttle stopping and turning at the end of K Street -- the shuttle that the EA states would take visitors to and from the end of K Street, from where they would walk to the boathouse.

11. Historical significance of area.

Consideration of whether the intent of preserving the C&O corridor as a national historical park is consistent with the proposed alternatives.

The national interest in such historical monuments that grace the nation's capital, and the large proportion of the US citizenry that visits the Washington area in their lifetime, including the C&O corridor.

The US citizenry's preferences regarding preservation of such historical sites.

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Thank you for the opportunity to provide scoping comments.

Sincerely,

Amber Jones