

THE CHESAPEAKE AND OHIO CANAL ASSOCIATION

A citizens association concerned with the conservation of the natural and historical environment of the C&O Canal and the Potomac River Basin

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January 18, 2008

Kevin Brandt, Superintendent
C&O Canal National Historical Park
1860 Dual Highway, Suite 100
Hagerstown, Maryland 21742
NCR_Georgetownboathouse@nps.gov

Dear Mr. Brandt:

The following statement on the EIS scoping process on the land exchange and GU Boathouse proposal is made in behalf of the C&O Canal Association. Justice William O. Douglas and his fellow hikers formed our Association as a volunteer citizens association to save the historic C&O Canal from road and dam builders and to promote the creation of the C&O Canal National Historical Park (NHP). Together we helped “walk” a national park into existence. Since its establishment in 1971 our Association has strongly supported the park service’s mission to preserve, protect and enhance this unique national treasure. We again find ourselves engaged in an effort to defend the C&O Canal from depredation.

The GU Boathouse Proposal: An Elephant in the Garden?

The C&O Canal National Historical Park grapples with recurring threats to its continuity and integrity not only from natural but human forces as well. Among the latter must be included recurring attempts to encroach upon this vulnerable and enticing ribbon of national parkland along the Potomac between Washington and Cumberland. The encroachment issue lies at the heart of the EIS now being initiated to examine a proposal to place a large Georgetown University boathouse within the confines of the C&O Canal NHP just below the university campus. A variety of reasons, plausible and implausible, are typically invoked to justify an intrusion into the C&O Canal’s valuable park land.

One of the C&O Canal’s glories unfolds as you travel west and pass by the historic Washington Canoe Club. There you enter into the natural setting of the C&O right-of-way. On your left you see the Three Sisters, a triplet of rocky outcroppings, heralding the entrance into the great Potomac Gorge. Though the C&O Canal is a marvel of the technology of early American civil engineering, the canal’s towpath has the feel of a country path following along a free running, wild river through uncluttered countryside. The natural splendor of the C&O corridor, the last unbroken canal right-of-way from the great American canal era, gives its national historical park a unique place in the nation’s treasury of national parks. The nation’s capital enjoys a special privilege that few other cities can boast of. It has its own national park issuing from its back door. It proceeds

along the Potomac free of urban sprawl for 185 miles to its terminus in Cumberland, Maryland. The splendid natural and historical setting of the C&O Canal is a prime value that must be preserved against unwarranted and deleterious encroachments.

The C&O Canal's natural setting begins and city ends just as you pass the west end of the canoe club building. It is a gateway to the great outdoors that the canal park is designed to preserve. It is precisely here that Georgetown University wants to put a large boathouse that would rival in size the largest of major university boathouses in the country.

The proposed boathouse is listed in *Alternatives #1 and #2* of the NPS EIS scoping document (Nov. 11, 2007). Either the 18,682 sq. ft. footprint of a very large boathouse (*Alt. #1*) or a large boathouse of a 15,000 sq. ft. footprint (*Alt. #2*), if built, would be wedged hard against the Capital Crescent Trail and the canal embankment next to the trail. Either sized boathouse at the proposed site would create a choke point at the proposed site. Trucking sixty foot rowing shells to and from these structures during regular practice and racing regattas can only produce congestion and safety hazards along the heavily traveled Crescent Trail. Access to the site is severely limited with room for only a very few parking spaces at the end of the structures. Vehicular and river access below Key Bridge is far better and argues for an alternate boathouse site downstream. Either of the proposed structures would dwarf the small and low profile Washington Canoe Club. Either would dominate the scene above Key Bridge and alter the view shed from both sides of the Potomac.

The EA asserted that boathouses on the waterfront were a feature of Georgetown's past history. However, the main boathouse area was downstream outside the present canal park. True, a flimsy, one-story structure on pilings was once put up near the canoe club site. It lasted but a year before a flood washed it away. The better built boathouses were down river.¹

The question the EIS needs to resolve is the question that is now at the center of intense public debate. The pressure of the controversy was a principal factor in the NPS decision to discard an EA advocating going ahead with the GU boathouse proposal and undertaking a more rigorous, thorough and objective EIS process. We applaud this decision.

That GU boathouse proposal would be implemented through an exchange of GU owned upriver property for a parcel of national park property on the west side of the WCC and just below the main university campus. Under the proposal GU would become the sole private owner of this property and its upriver property would be transferred to the national park.

While the scope of the EIS is designed to investigate a wide variety of questions dealing on the potential impacts of the proposed structures on their surroundings, the fundamental issue facing the EIS is this: "Does the proposed land-exchange to allow construction of a private boathouse inside the C&O Canal National Historical Park

¹ The question of the many impacts such structures would have on their surroundings is well set out in its various dimensions in the Defenders of the Potomac Parkland statement on the EIS scoping process. The potential impacts on the tidal floodplain, nearby historic areas, scenic values and view shed, hydrology, ecology, endangered migrating fish species, wildlife, wetlands, the river and its shoreline are listed in that document. As a member of that coalition the Association endorses its outline of the impact zones that the large boathouse structures would affect. It is not necessary to repeat them here.

conflict with the NPS mission to protect national parks from unwarranted intrusions or not?”

We believe that the short answer is: “Yes! It does conflict.” It is astounding to us that park service officials could count among their obligations the promotion and implementation of the rowing program of a private university. What has led them to such a point? Why should their support of the proposed land exchange and boathouse proposal override the public interest in preserving the integrity of a national historical park in all its parts? The designation of the C&O Canal as a national historical park in itself indicates that it is a national resource that holds high rank in the various gradations of parklands. Does it not then enjoy obvious precedence over a private university’s competitive rowing program in the order of public values? Under the proposal a prime parcel of the C&O Canal NHP is to be turned over to a private, rather than a public use. The exchange would benefit a few in a university community, but not the public at large. How does the GU rowing program serve the C&O Canal NHP’s purpose as it is defined in the enabling legislation, namely, “to preserve and interpret the historic and scenic features” of the canal and its environs. Does the proposal not reflect a misordering of priorities by park service officials? These are some of the questions that we in our Association find most disturbing and most needing clear and convincing answers in the EIS.

The claim has been made that a GU boathouse, though private, would be compatible with the legislation creating the C&O Canal National Historical Park. The law says one of the park’s purposes is: “to develop the potential of the canal for *public* [italics added] recreation.” It strains logic to say that a private rowing program develops *public* recreation. It might be said that such a use would contribute to competitive boating on the Potomac but how can it be construed to contribute to *public* recreation in the C&O Canal NHP?²

Moreover, how can it be part of the NPS mission to carry out a land exchange that diminishes rather than enhances the canal park? Under the public law that created the C&O park the Secretary of the Interior is not authorized to dispose of park lands, but may “acquire land” by purchase or exchange. In the case at hand the canal park loses rather than gains prime parkland. Such a result is hardly the intention behind the acquisition authority.

It is also argued that the upriver parcel GU owns is equivalent in value to the park as the downriver parcel that the park would give up. This seems hardly the case. The upper parcel does not match the lower in parkland values otherwise the park would long ago have acquired it in its land purchase program. Further, it seems evident that the upper parcel is of far less value as real estate than the lower. The lower parcel is shoreline property close to Georgetown and would surely be highly attractive to

²It might be noted here that the 1976 NPS park plan that has guided the park’s policy over the years says that “the urban need for manmade playgrounds which provide structured recreational facilities can not be met by the Chesapeake and Ohio National Historical Park. Instead, the role of the park is to provide its visitors with a natural and historic environment in which to enjoy such pursuits as hiking, biking, canoeing, camping, horseback riding, fishing and boating.” Clearly, the narrow canal is not adaptable for racing shells, but rather for small non-motorized boats and mule-drawn canal boats.

developers. The upper parcel is a narrow strip too far removed from urban facilities and inaccessible.

One assessor evidently judged GU's upriver parcel as "unbuildable." Even cursory examination of what is a long 45-foot wide strip of land indicates that it is probably too narrow to accommodate a boathouse of the magnitude GU has in mind. Further, there is room for skepticism that GU ever seriously considered building on this site. Rather, there is room for suspecting that the site was acquired from CSX with a view to its use as a bargaining chip for acquiring the lower parkland just below GU's campus. The EIS should seek to clarify these matters and develop a comparative assessment of the two parcels by a qualified and independent assessor.

We conclude that the proposed land exchange does not conform to the NPS's mission to protect the parks nor is it in the interest of the C&O Canal NHP. Therefore, we recommend that the western end of the waterfront zone for boating activities not extend beyond the Washington Canoe Club. That area should remain undeveloped and its natural setting preserved. The land exchange, therefore, ought not be undertaken, nor a large boathouse built on the west side of the Washington Canoe Club. Thus, alternatives #1 and #2 should be discarded. We believe that alternative #4, construction of a GU boathouse on the GU owned upriver site is probably not feasible in view of its limitations and is not likely to occur. It then follows that either the "no action" alternative ought to be chosen or that alternatives for providing facilities for competitive rowing be located down river and outside the C&O park. In this case, the preliminary scoping document should be revised to consider various new alternatives outside the C&O park. While this would not exclude construction of a GU boathouse east of 34th Street on an NPS owned site within the Georgetown Waterfront Park (alternative # 3), several other alternatives should also be considered. For example, the Thompson Boathouse facility, which now houses the GU rowing team, could be expanded to provide greater accommodation for GU and add space for area high school teams. Some public use could be accommodated as well in an enlarged facility. Another alternative would have GU and GW undertake a joint project to build a boathouse large enough for both teams at the 34th Street location. The scope of the EIS should also provide for waterfront recreational activities in addition to facilities for competitive rowing and boating.

We in the C&O Canal Association see ourselves as friends, not adversaries of the park service. Over the years we have found many good friends in the park service, friends who serve our national parks and country with great dedication and professional skill. Our criticism of what we see as potential missteps in policy are motivated by honest friendship and concern for the future of our national parks.

If properly conducted the EIS study can reveal that there are good options for developing new or improved facilities outside the C&O Canal National Historical Park. We see no insuperable obstacles to adjusting plans to make room for a GU boathouse facility outside the national park. By contrast, an attempt to squeeze an extremely large university building into a narrow section of national parkland can only encounter a host of practical and environmental problems. There is no need to compromise the scenic and historic qualities of our beloved national historical park. With common sense and good will, the GU boathouse issue can be resolved without encroaching on the C&O Canal National Historical Park, or detracting from the new waterfront park emerging along the

Georgetown river shore. The two can coexist in harmony without one interfering with the other. Let's then open a new, more constructive chapter of this story.

Sincerely,

Carl A. Linden
President
The C&O Canal Association