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January 7, 2008

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

Re: Georgetown University boathouse proposal-scoping comments (EIS)
EIS identified alternative boathouse sites

Dear Mr. Brandt:

In the announcement of its intention to prepare an EIS for the Georgetown University boathouse proposal, the Park Service identified certain alternative sites for this boathouse including the site previously recommended by the Park Service in the EA 1,250 ft. upstream from Key Bridge inside the C&O Canal NHP with two different configurations pertaining to the size and height of the boathouse. The Park Service also identified the site at 34th St. adjacent to the site promised GW, which was proposed by many of us attending the EA scoping session on January 11, 2005 as the most environmentally preferred location for this boathouse.

Enclosed herewith is my letter of June 12, 2006 in which I elaborate on the environmental disaster of placing a large collegiate boathouse within the C&O Canal NHP near the entrance to the Capital Crescent Trail. In that letter, I also extol the environmental and land use benefits of the site adjacent to GW's at 34th St.

While a few changes on the ground have occurred since June, 2006, the basic environmental concerns and land use planning issues remain the same. For example, in June, 2006, the site at 34th St. was an environmentally degraded parking lot covered with asphalt. It is very different today since the Park Service has rushed to complete Phase I of the Georgetown Waterfront Park. Thus, it is predictable that the Park Service will now contend that the work accomplished in that Park should preclude any consideration of the 34th St. site for Georgetown University's boathouse. It was for this very reason that as early as September 27, 2005 and repeatedly urged in many letters thereafter, I asked for a delay on the work on the Georgetown Waterfront Park until such time as the EA on the Georgetown University boathouse proposal was resolved. In this connection it is significant that on November 13, 2006 Steve P. Martin, then Deputy Director, NPS, told a group of us that at that time the National Park Service was giving serious consideration to the preparation of an EIS for the Georgetown University boathouse proposal. (See my letter of 11/23/06 to Steve P. Martin which is attached; see also my letter to Fran P. Mainella, then Director, NPS of 6/20/06, which is attached.)

Now, over a year later, the Park Service has decided on the EIS course of action. Why the one-year delay? I do not believe it is unreasonable for the public to conclude that this unexplained and unreasonable delay in making this decision was to enable the Park Service to virtually complete Phase I of the Georgetown Waterfront Park and thereby attempt to remove from consideration the most environmentally preferred location for the University's boathouse.

The Park Service should not be allowed to avoid the environmental and land use planning mistake it persisted in making over the last year or so. Furthermore, I am sure that Georgetown University would be happy to bear the cost of undoing this mistake in order to acquire an environmentally acceptable location on the waterfront for its boathouse.

In conclusion, I ask that this letter with the attached letters as well as the June 12, 2006 letter from me be made part of the administrative record in the pending EIS. Thank you for your cooperation in the matter.

Respectfully submitted,

Robert B. Norris

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