

January 18, 2008

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

RE: PEPC Project 15645

Dear Superintendent Brandt:

I appreciate the opportunity to comment on the scope of the Environmental Impact Statement (EIS) that will be prepared concerning the proposed Georgetown University (G.U.) boathouse and related land exchange. The EIS represents an opportunity to address this issue in a fair and comprehensive manner. To achieve that result, however, the study must include more alternatives than indicated in the notice of December 3, 2007, and it should give a number of topics more examination than they received in the Environmental Assessment (EA). Examples are as follows:

ADDITIONAL ALTERNATIVES:

Public boating facilities beyond the Georgetown area: A part of the rationale advanced for building a new G.U. boathouse is that the withdrawal of the university's rowing team from Thompson Boat Center will provide more space for the public, particularly for high school rowers. Addressing this need should therefore be considered in the EIS. Sites and facilities throughout the National Capital Region suitable for public and high school rowers should be examined, including alternatives in Virginia and on the Anacostia River in the District of Columbia. One example is the Anacostia Community Boathouse Association's facility at 11th and O Streets, S.E., which the organization wishes to expand and develop. If more facilities are needed for students at public schools, the National Park Service (NPS) should address that issue in a direct manner, rather than by assisting a private institution to fulfill its desiderata.

Public boating facilities in the Georgetown area: If additional facilities are needed in the Georgetown area for individual and high school rowers, NPS should consider at least three options: (a.) establishing a public boathouse in the new Georgetown Waterfront Park (GWP); (b.) improving and/or expanding Thompson Boat Center; and (c.) opening the historic Washington Canoe Club building for some public use. Option (c.) would involve an agreement with the current lessee, and could be accompanied by improvements that would make this building suitable for a limited increase in use that would be in scale with the site's intrinsic limitations. These options are not mutually exclusive, and all three could be adopted together.

Additional sites for a G.U. boathouse in the GWP. Alternative 3 of the Notice of Intent is to construct a G.U. boathouse "east of 34th Street on an NPS-owned site" within the GWP. This wording is unclear, but seems to refer to a single unspecified site that has already been selected; however, multiple sites in the GWP appear feasible, and should be included as options to be carefully examined in the EIS.

It should be noted that NPS seems to have ignored a request to postpone any development of the GWP that might tend to foreclose options for establishing a boathouse within the new park. In evaluating sites within the GWP, therefore, the EIS cannot legitimately argue that work already done on the GWP is a reason not to select a site there for boathouse construction.

Additional sites for a G.U. boathouse beyond the Georgetown area. Alternatives site in Virginia and the District of Columbia should be identified and considered. Their advantages might include avoidance of the crowded land and water traffic in the area of Georgetown.

A combined boathouse. A facility to serve the teams of both G.U. and George Washington University could be placed at 34th and Water Streets or some other suitable site that is not in a National Historical Park. A variant of this alternative is a combined boathouse to serve both collegiate, high school, and individual users.

TOPICS FOR DETAILED CONSIDERATION.

The EIS should not merely be an add-on to an unsatisfactory EA. Instead, it should be a thorough review of all aspects of the G.U. boathouse issue and the cumulative effects of the proposal upon the Georgetown waterfront and upon the natural and historical environment. In particular, it should examine the effects upon the C&O Canal National Historical Park (C&OCNHP), which is an invaluable part of our national heritage. Examples of the topics that merit close examination are the following:

Propriety of the land exchange. Alternatives 1 and 2 involve an exchange in which NPS would receive G.U.'s upriver lot in return for a site near Key Bridge. The EIS should address the question of whether such an exchange would meet the spirit and/or letter of the law that permits the C&OCNHP to engage in land exchanges to enhance the park. An important related issue is the obvious and very large disparity in monetary value between the site that G.U. owns and the prime property that it wishes to obtain. NPS should determine the relative value of the two sites as part of the EIS, and explain what additional compensation the university would offer if an exchange were to be concluded.

Feasibility of the G.U.-owned site: Having visited the narrow and uneven upriver site, I question whether it is possible to build there a boathouse capable of housing a university rowing team, as envisioned in Alternative 4. I also doubt that G.U.'s right-of-way offers a practical way for rowers, coaches, and service vehicles to reach such a facility. The EIS should examine whether Alternative 4 is a substantive option, or simply a bargaining chip through which the university hopes to obtain approval of Alternatives 1 or 2.

Other means by which NPS could obtain the G.U.-owned site. A fundamental premise underlying Alternatives 1 and 2 is that NPS should engage in the land exchange in order to protect the Park from the harmful effects the university's developing its own upriver site. As stated above, I doubt that this premise is valid; however, it is a long-standing policy of the C&OCNHP to eliminate private holdings within the Park's borders. The EIS should therefore consider whether the Park should acquire the G.U.-owned site through purchase, condemnation, or an exchange for land outside of the C&OCNHP.

Size of the proposed boathouse. Information generated by the EA process showed that the size of the boathouse proposed under Alternative 1, and even under Alternative 2, exceeds reasonable needs, and that the plans included many non-essential elements. The EIS should establish the realistic size requirements for a building to accommodate the G.U. team's waterfront activities.

Visual impact. The EA documented the fact that Alternatives 1 and 2 would significantly degrade the area's outstanding scenic value. The EIS should consider whether this harmful effect is not sufficient in itself eliminate Alternatives 1 and 2.

Risk of flood damage. Alternatives 1 and 2 would place a massive structure on a shoreline prone to flooding, creating a funnel for floodwater between the long new structure and the canal berm. The potential effects of this on the surrounding historical structures and natural environment should be researched, documented, and taken into account in the EIS.

Crowding. One result of the popularity of the C&OCNHP and the Capital Crescent Trail is frequent crowding of the narrow gateway portion of the Park. In this same congested area, Alternatives 1 and 2 would place a busy new facility that would require continual visits by vehicles towing shells and providing services. The EIS study should include an in-depth study of the extent and effects of the increase in vehicular and foot traffic.

River safety. The EIS should examine the safety implications of the fact that, under Alternatives 1 and 2, rowing teams would be routinely placed in close proximity to canoeists.

Natural Environment. The EIS should include full consideration of the environmental consequences of those alternatives that involve placing a new structure in a natural setting, including effects on wetlands, birds, land animals, and fish such as endangered sturgeon.

Historical setting. One of the fundamental missions of the C&OCNHP is to protect the historical setting of the C&O Canal. The structure envisioned under Alternatives 1 or 2 is completely different in scale and appearance from any small boathouse may have once existed in the vicinity of the site. The EIS should examine whether Alternatives 1 and 2 are compatible with the responsibilities of the C&OCNHP for historic preservation.

Process. Opponents of Alternatives 1 and 2 have voiced objections to the process through which NPS has considered the G.U. boathouse proposal to this point. Questions have been raised, for example, about lack of proper consultation with citizens' organizations and governmental entities, and about the extension of the non-motorized boathouse zone to cover the site desired by the university. The EIS study should examine the process employed so far, and address any defects that might tend to undermine the legitimacy of the outcome.

I am submitting these comments as an individual citizen, and not on behalf of any organization. My hope is that the EIS will recognize the overriding public interest in protecting the C&OCNHP, and that the outcome will be a just settlement of a long-standing controversy.

Sincerely,

Edmund (Ned) Preston
6306 Swords Way
Bethesda, MD 20817
301-530-8153

Note: A copy of this letter was submitted electronically before 11:00 a.m. on January 18, 2008.