

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

January 14, 2008

Re: Proposed land exchange and the Georgetown boathouse Environmental Impact Statement (National Park Service PEPC Project #15645)

Dear Mr. Brandt:

First, I wish to commend the National Park Service for its decision to prepare an Environmental Impact Statement (EIS) to examine the Georgetown University proposed exchange of land which would allow the University to construct a boathouse within the C&O Canal National Historical Park. It is my urgent hope that this EIS will be a thorough and impartial study.

This proposal, to remove land from the C&O Canal National Historical Park, is contra to the legislative intent and history creating the C&O Canal National Historical Park. The National Historical Park will be greatly impacted by this exchange. Concerns dealing with scenic views, environmental issues such as direct and indirect impacts on the natural resources, fish, wildlife, floodplains and wetlands, not to mention hydrological implications on the area during floods, need to be addressed. In addition, an impartial appraisal is necessary to determine whether the exchange of land being proposed is truly of equal value.

Most importantly, in my view, it is relevant that a thorough historical and legislative review be undertaken to determine whether such a land exchange will have negative implications for future development of the C&O Canal National Historical Park. To remove land from the Park would be a precedent setting action which could be used as a justification by other private parties along the 184 mile Park to also request an exchange of land that would result in converting parkland to private "recreational" purposes. The Park has granted leases to private entities, but never given up land. Even the right to lease has recently been questioned by the Inspector General of the Department of Interior. See Audit Report No. W-IN-MOA-0008-2005 issued by the Office of Inspector General, entitled "Private Use of Public Lands". The report found that the National Park Service has for decades regularly permitted private parties and clubs to monopolize public locations near major metropolitan areas to the exclusion of the public. If such leases are now improper, how can giving up public land as envisioned by this exchange, be acceptable? Therefore, a careful examination of the legislative history and Public Law 91-664 which created the Park is imperative. I believe such a review will show that the land exchange is not in keeping with the intent of the law creating the C&O Canal National Historical Park.

Because of the above grave concerns, it is necessary that additional alternatives be considered and evaluated in the EIS. Such alternatives should include: Placing the boathouse at another accessible site outside of the C&O Canal National Historical Park. Some areas, among others to be considered, are (1) 34th/Water Streets (2) on land on the Anacostia River (3) the Virginia side of the Potomac.

I hope that these brief comments will be of assistance in the formulation of the EIS.

Sincerely,

Helen L. Shaw