

DEFENDERS OF POTOMAC RIVER PARKLAND
5712 SHERIER PL NW
WASHINGTON, DC 20016
(202) 363-4546

January 13, 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 for EIS - Georgetown University boathouse proposal, NPS project 15645

Dear Mr. Brandt:

Following are scoping comments from Defenders of Potomac River Parkland, an alliance of 24 national, regional and local conservation, recreation and civic organizations that support the preservation of the undeveloped shoreline and the riparian zone of the Potomac River between Key Bridge and Chain Bridge. The member organizations are:

American Canoe Association, American Hiking Association, American Whitewater Association, Audubon Naturalist Society, Canoe Cruisers Association, Citizens Committee to Save Laurel Lakes, C&O Canal Association, Coalition for the Capital Crescent Trail, Dupont Circle Conservancy, East Coast Greenway Alliance, Friends of the Earth, League of Women Voters of DC, National Parks Conservation Association, Potomac Appalachian Trail Club, Potomac Conservancy, Potomac Heritage Trail Association, Potomac Pedalers Touring Club, Quantico Orienteering Club, Rails to Trails Conservancy, Sierra Club-DC Chapter, Washington Area Roadskaters, Washington Canoe Club and Western Lands Project.

We believe a GU boathouse in the C&O Canal NHPark would harm the park while diminishing the visitor experience to the narrow, fragile, busy, wild and scenic entrance along the undeveloped shoreline. We also believe the potential consequences to the area during and after construction of a GU boathouse would be devastating and impossible to mitigate.

We believe a GU boathouse in the C&O Canal NHPark is not in the public interest and, therefore, NPS should do the following in the preparation of the EIS:

- A. Reject the three proposed alternatives for a GU boathouse in the C&O Canal NHPark;
- B. Broaden the scope of the EIS to address all of the recreational needs for the waterfront, not just the rowing needs of one private university;
- C. Seriously consider additional viable alternatives outside the C&O Canal NHPark.

Unless NPS seriously considers additional viable alternatives outside the C&O Canal NHPark, the EIS exercise will be in vain, as well as a loss of time and resources, because the public will undoubtedly reject a GU boathouse in the C&O Canal Park for a second time, just as they did in 2006 (EA for the same project).

Scoping Points: The EIS for a proposed Georgetown University boathouse should address the following points:

I. Issues/impacts –

- A. Destruction of a section of wooded tidal floodplain from the construction of a private, collegiate boathouse at the narrow, fragile entrance to the C&O Canal NHPark, the Capital Crescent Trail and the Potomac Gorge, and the setting of a precedent for future development in the Park.
- B. Congestion, safety and traffic issues at the busy gateway site and surrounding area during the construction, maintenance and servicing of the private boathouse, as well as the delivery of boats on 60-ft long motorized truck- trailers along a narrow, busy recreational and commuter trail.
- C. Potential impacts on nearby historic areas (C&O Canal NHPark, Potomac Gorge, Washington Canoe Club).
- D. Significant impacts on the scenic area from the Key Bridge, the George Washington Memorial Parkway, the Towpath, the Potomac Heritage Trail, the American Discovery Trail, the Potomac Gorge.
- E. Hydrological impacts to the area during floods (historically significant along the Potomac River waterfront).
- F. Direct and indirect impacts on the natural resources, fish, wildlife, floodplains and wetlands from a proposed GU boathouse at sites within the C&O Canal NHPark.
- G. Cumulative impacts on river and land from the construction of proposed boathouses, and other development planned for the vicinity of Key Bridge.

H. Value of C&O Canal NHPark gateway site relative to land proposed to be swapped for it.

I. Potential impact on shoreline boaters from a 75-ft. long private dock (45-ft. permanent dock plus 30 ft. floating ramps) extending out into the river; the safety of navigation patterns that would result from the two alternatives under which a team rowing facility would be placed directly adjacent to a canoe facility.

J. Potential impacts on public health during and after construction of the boathouse if the corroding 84-inch diameter sewer line (Potomac Interceptor), or smaller one nearby (MUPPY), is disturbed or ruptured.

K. Public controversy and potential significant impacts generated by the proposal, including Defenders of Potomac River Parkland, 24 conservation, recreation, civic and historic preservation organizations representing hundreds of thousands of individuals.

II. Alternatives –

A. New viable alternatives to be seriously evaluated in the EIS:

Alternative #1 - Instead of building two large private "university" boathouses and one new unfunded public boathouse in the constricted Key Bridge area (as per the current modified Georgetown Waterfront Plan of 1987), consider building only one new facility: a Georgetown "universal" (public-private) boathouse at 34th/K Sts., financed by GW and GU and shared by university, high school and public boating programs, with NPS retaining ownership of the waterfront land. (Thompson's Boat Center, built in 1960 at the eastern edge of Georgetown, is the model.)

Alternative #2 - Instead of building any new boathouses in the Key Bridge area, and trading waterfront land to private interests, encourage GW and GU to invest in an expanded/updated Thompson's Boat Center (see Swedish Embassy, next to Thompson's on land where high school groups formerly stored their rowing shells, for limitless possibilities for design and size of a modern structure), and keep land under Key Bridge in the public domain for launching of boats and storage purposes only.

Alternative #3 - If NPS decides it is essential for two private universities to build their own collegiate facilities and own waterfront land, NPS should consider placing the boathouses next to each other, at 34th/Water Sts. or at another accessible location outside the C&O Canal NHPark. (NPS already has identified an alternative site for a GU boathouse downstream from 34th/Water Sts.; another alternative site for a GU boathouse is between Key Bridge and the Potomac Boat Club, in which case the public facility/Jack's would be moved to the old Dempsey site upstream from the Aqueduct bridge, as per attached diagram labeled "Diagram of Alternative Boathouse Sites"; other original alternatives (location, size, use) in this area should be considered, such as

developing land on canal side of Water St. for boathouse/training purposes and using the space under Key Bridge for launching and storage purposes only.)

Alternative #4 - Utilize, expand or build boathouses on the Anacostia River or the Virginia side of the Potomac, or other accessible land outside of the C&O Canal NHPark as a means of providing additional facilities for team rowing, particularly for high school teams whose needs are advanced as part of the justification for a new GU boathouse.

All of the above-mentioned alternatives provide environmental, technical, practical, social, safety, economic and historic preservation advantages over the current plan while protecting the C&O Canal NHPark and contributing to the redevelopment of the waterfront and the city.

B. Alternatives as to what is contained in a boathouse to greatly reduce its size and minimize impacts on the C&O Canal NHPark. There has been ample testimony, including by members of the rowing community, that a training component, such as a rowing tank, is best located elsewhere. (See "Alternatives" at www.savethecanal.org)

III. Process -

A. The non-motorized boathouse zone, as defined in the Georgetown Waterfront Park Plan of 1987, extended only to 1,000 feet upriver from Key Bridge, for a 4,000 sq. ft. boathouse for public use, not 1,250 for a 15,000-19,000 sq. ft. private boathouse, as stated in the EA. Since the proposed scope for the EIS includes at least one site that extends outside the boathouse zone, other sites outside the zone should also be considered in the EIS.

B. Justification for the fast tracked process.

C. Points that were not properly discussed in the EA such as:

1. A comprehensive study as required by NEPA that addresses all of the recreational needs of the waterfront area, including boathouses and a bike path, not just the needs of one group of rowers of one private university.

2. A proper review in terms of legislative intent and history for the C&O Canal NHPark, the Capper-Crampton Act, the National Historic Preservation Act, and the Georgetown Waterfront Park plan itself, and what is allowable for a land swap.

3. Judgment of the magnitude of the impacts must be made in terms of preserving the National Historical Park, in which the entire proposed action takes place. The purpose of NPS is to protect and foster parkland, not a private entity such as GU.

4. An evaluation/traffic study of the area between the DC entrance to the Capital Crescent Trail and the Rock Creek Park along K St., and the conflicts raised by any boathouse at the gateway site.
5. Removal from the EIS of unofficial documents which were made part of the EA, such as Appendix L, which is by the Georgetown Waterfront Commission. This is in violation of FACA, even if the waterfront commission is considered a true governmentally-authorized commission, because it was never submitted for outside comment, and included no review by interested parties concerned with the C&O Canal NHPark, despite the immediate impact on the park and its entire community. It therefore has no standing as a planning document.
6. Consideration of inputs from the C&O Canal NHPark Advisory Commission, an official body established by Congress to advise on matters affecting the Park.
7. Recognition that the C&O Canal NHPark is a national historical park established by Congress, and any impacts from the proposed project should be judged in this context.
8. How the project is in the public interest, not just the interests of one group of rowers of one private university.
9. A review of the entire land exchange proposal, including: the evaluations used to justify it; whether it is consistent with the letter and intent of legislation that established the C&O Canal NHPark; whether it improves the C&O Canal NHPark; whether development of GU's upriver property as a team boathouse is actually feasible; and what other tools are available to deal with the possibility of such development.
10. Reopen Section 106 for a complete reassessment of the appropriate size of a boathouse for every alternative, and require consultation with DC, Maryland and Virginia State Historic Preservation Offices.
11. Consult with local government officials in areas that border the C&O Canal NHPark, such as DC and Montgomery County, as well as in other areas affected by the proposals, such as Arlington and Frederick Counties.
12. Consult with NPS safety, natural resource and historic preservation specialists about impacts.
13. Consult with ANC3D (three neighborhoods border on the undeveloped section of the C&O Canal NHPark in Washington, DC, and include park area where the GU-held land is located).

14. Include in the EIS an assessment of the impacts to the C&O Canal NHPark from any permanent piers planned for the proposed alternative boathouses. The impacts of each pier must have full compliance review.

15. Include an inventory of all lands within the C&O Canal NHPark being used by private groups (land that might be traded or developed for private interests if precedent is set by GU land swap). In addition, the EIS should include a detailed map of and discussion regarding the ownership configuration in the project area. How much private land lies within the boathouse zone? Are there long-term plans to trade all public land in the boathouse zone for private land elsewhere? How many, if any, actions have occurred that privatized public land within the boathouse zone since its designation? What other exchanges are planned in the project area in the future?

16. Include a description of the potential impacts to the sewer lines that are located in the C&O proposed project area from construction and use of a new boathouse, and from any required modification to the CCT route.

17. Evaluate the GU-held site in the C&O Canal NHPark in terms of building a boathouse there that is comparable in size to the boathouses proposed for the other site in the C&O Canal NHPark.

Thank you including these scoping comments in the preparation of the EIS for project 15645.

Sincerely,

Sally Strain

DC Coordinator, Defenders of Potomac River Parkland www.savethecanal.org

Enc. "Diagram of Alternative Boathouse Sites"