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Mr. Kevin Brandt, Superintendent
C&O Canal National Historical Park
1850 Dual Highway, Suite 100
Hagerstown, MD 21740-6620
Via e-mail: NCR_Georgetownboathouse@nps.gov

Re: Georgetown University Boathouse EIS Scope (ID: 15645)

Dear Mr. Brandt:

I was pleased that the NPS realized the need to do an EIS for Georgetown's University's proposed boathouse. But I think it is totally missing the mark by narrowly focusing on the question of where Georgetown University should place the boathouse. Instead, NPS should be looking much more comprehensively at recreational use of the Potomac River. And the emphasis should be to increase public use of the river, not private use of the river such as Georgetown's proposed boathouse. To that end, NPS should determine the need for boat houses for the public, including public high schools, and private entities such as Georgetown University and the George Washington University. Then, after determining that need, NPS (not private institutions) should build those facilities at the appropriate location. The private institutions can pay NPS to store boats at the NPS facilities.

Thus, I think NPS should greatly expand the scope of this EIS to look at alternatives for public and private recreational use of the Potomac River, on both DC and Virginia sides, as well as the Anacostia River. (Both the District of Columbia and NPS have recognized the need to develop recreational uses for this area). And NPS should be the owner of any facilities that are determined to be necessary.

The NPS announcement that it was planning on doing an EIS states in the last paragraph that Thompson's Boat Center is "inadequate for [GU's] purposes." What are those purposes? Isn't the purpose of a boathouse to store boats? Does GU plan on its boathouse serving more purposes? If so, is that an appropriate use of parkland and how does that enhance the public recreational use of the river and the Park?

NPS keeps referencing the size of the proposed boathouse's footprint. But doesn't the height matter as well? The EIS should address that as well. And the EIS should fully address the impact of the proposed boathouse on the C&O Canal NHP, not just based upon its foot print (which is huge) but also its total size as well.

NPS indicates that one of the land use goals evaluated was” precluding development of a boathouse on the University’s largely undisturbed inholding ...” Does NPS really believe GU plans on building a boathouse on the inholding? Has there been any evaluation of whether a boathouse is feasible on that property? The proposed land swap needs to be better evaluated. Is it within the scope of authority of the C&O NHP? To the extent that the Park has authority to swap its existing property for other property not currently owned by the Park, surely it is necessary to satisfy three conditions: 1) the property being traded is not needed by the Park; 2) the property being obtained is needed by the Park; and 3) the property being obtained should be at least as valuable as the property being traded. Does the proposed swap meet these conditions?

In addition to the comments above, the EIS should include:

1. Direct and indirect environmental impacts on the natural resources, floodplain and wetlands at the site of the proposed private boathouse. For example, a) Destruction of a section of wooded tidal floodplain from the construction of a building the length of a football field at the narrow and fragile entrance to the C&O Canal National Historical Park, the Capital Crescent Trail and the Potomac Gorge; and b) Hydrological impacts to the area during floods (historically significant along the Potomac River waterfront).
2. 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, and the Potomac Gorge.
3. The setting of a precedent for future development in the Park.
4. Congestion, safety and traffic issues at the busy gateway site and surrounding area related to the construction, maintenance and servicing of the private boathouse, as well as the delivery of boats on 60-ft. trailers along a narrow, popular recreational and commuter trail.

A better boathouse plan is possible that will 1) protect the C&O Canal NHP from private development, 2) provide boathouses for the university, high school and public groups outside the C&O Canal NHP, and 3) ensure a safe and enjoyable experience for visitors to the Park and the waterfront.

Sincerely,

John H. Wheeler