

THE COMMITTEE OF 100 ON THE FEDERAL CITY

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January 18, 2008

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

Dear Superintendent Brandt:

Re: Georgetown University Boathouse

The Committee of 100 on the Federal City has followed developments at the proposed GU boathouse site on the Potomac River. We continue to have concerns about how evaluations are being made.

The Federal undertaking that is represented by the land exchange involving this site is subject not only to the National Environmental Policy Act but the National Historic Preservation Act as well. I am enclosing a copy of our comments on the Environmental Assessment study that was previously released in connection with the land exchange, as nearly all of those comments are still relevant. (Only the completion of the Canal Road Entrance to GU has changed.)

The Committee believes that the alternatives identified in the National Park Service announcement of the EIS in December should be evaluated, along with a review of the findings of the earlier EA, particularly regarding hydrology. Any further alternative sites should similarly be evaluated for suitability and impact.

The scope of the study should include the collective impacts of planned future boathouse and other development at the non-motorized boathouse zone, as well as Thompson's Boathouse. Further, the scope of the EIS should include all Areas of Potential Effect in order to comply with §106 directives. Reasonably foreseeable effects must be considered; segmenting related projects must be avoided to comply with the NPS DO-12.

There is no mention in the notice of the NHPA provisions. The Committee of 100 strongly urges the Park Service to announce its plans for NHPA review, and we repeat our request to be named a consulting party for this study. A project affecting two separate National Parks, adjacent to National Historic Landmarks, in a community that is itself a National Historic Landmark, on an American Heritage River demands the rigor of protections offered by NHPA.

On behalf of our Chair, Laura Richards, I ask that you accept these comments and those contained in the enclosure.

Sincerely,

Barbara Zartman, Chair
Zoning Subcommittee