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Washington, D.C. Chapter

June 15, 2006

Mr. Kevin Brandt, Superintendent
C&O Canal National Historical Park
1850 Dual Highway, Suite 100
Hagerstown, Maryland 21740-6620

Re: Georgetown University Boathouse Environmental Assessment – Option D, “No Build”
Alternative

Dear Superintendent Brandt:

On behalf of the Sierra Club, I submit the following comments in support of Option D, the “No Build” Alternative.

Statement of Principles

The Sierra Club is America’s oldest, largest and most influential grassroots environmental organization, with more than 750,000 members, including more than 3,200 members in the District of Columbia. The Sierra Club has a long and distinguished history of fighting to create and protect our national parks and other precious natural areas for future generations to explore and enjoy.

As Washingtonians, we are blessed with hundreds of acres of national parkland, including gems like Rock Creek Park, the National Mall, Anacostia Park, Glover Archbold Park, Potomac Park and the C&O Canal National Historical Park. Unfortunately, we find these parks under siege, and now we find the C&O Canal National Historical Park threatened by inappropriate development.

Congress charged the National Park Service with preserving our national parks in order to “conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” (The National Park System Organic Act,

1916). In some cases we find the agency upholding this mission. However, in this case we are very troubled to find the Park Service on the wrong side of the issue – making a back room deal and “playing favorites” with the Georgetown University administration to trade away our prized public parkland for private development.

We in the Sierra Club believe that public parkland must remain in the public domain, and we have a long history of fighting inappropriate development in our parks. Locally, we fought and defeated construction of a road through Glover Archbold Park and an amusement park on Kingman Island, and more recently we worked with neighborhood groups to defeat the Park Service’s plan to give away four acres of Whitehaven Park to the Casey Foundation for development of a mayoral mansion. We intend to continue to fight this proposed boathouse development just as vigorously as we have fought these previous battles.

We support non-motorized recreation on the Potomac, and we do not oppose the construction of a boathouse at an appropriate site – down river and outside the C&O Canal National Historical Park. But we vehemently oppose the construction of a massive new boathouse on what is public parkland.

Our Major Concerns about the Environmental Assessment

We are very concerned about the proposal to build a massive new boathouse on what is currently public parkland in a natural riparian area. Over the last several years, we have challenged several fundamental assumptions behind the proposed Georgetown University (GU) boathouse, and we find little in the Environmental Assessment that addresses our concerns. In addition, there are a number of troubling assertions or statements of fact in the Environmental Assessment (EA), which are either misleading or inaccurate. The following constitute our major concerns about the process and the resulting EA.

1. Land Exchange is not in the Public Interest

We do not believe that the National Park Service has made the case for the proposed land exchange, in the EA or elsewhere, and we believe that it would not be in the public interest. The EA claims that Georgetown University could build a boathouse at the site it owns upstream, and plans are provided in the EA. But a cursory look at the plans in the EA reveals that the site is too narrow for efficient use as a boathouse, is grade-challenged, and is inaccessible (in fact, the plans show access to the northwest end of the site along the Capital Crescent Trail (CCT) right-of-way despite the fact that the Georgetown easement for vehicles along the CCT ends at the southeast corner of the site). It is clear the site is unsuitable for any boathouse use, let alone the large facility which is taken as GU’s legitimate “needs” in the EA.

2. Public Involvement Process Lacking

We are troubled that the process that has led up to the preparation of this Environmental Assessment (EA) has not been sufficiently inclusive. During the earliest stages of discussions between the Park Service and Georgetown University when this proposal was developed, the public was not adequately informed or given an opportunity to help shape this proposal. And most recently, the public meeting held to seek public comment on this EA was held in an out-of-

the-way location that was neither close to the location of the proposed boathouse nor accessible to public transportation. Whether accurate or not, this creates the public perception that the Park Service is not truly interested in hearing the public's opinion of this proposal and the EA prepared in support of it.

3. Environmental Assessment Falls Short of NEPA Requirements

We believe that the Park Service's decision to prepare an EA rather than a more comprehensive Environmental Impact Statement (EIS) falls short of the requirements of the National Environmental Policy Act. Given the significant level of controversy over the proposed boathouse in the C&O Canal National Historical Park, it is difficult to understand why the Park Service is not preparing an EIS. Over the last several years, citizens have raised numerous questions and concerns about the proposal and submitted hundreds of comments on it. And it is hard to comprehend why the proposed boathouse, which would be located on environmentally sensitive riverfront parkland in a national historical park, would not constitute a significant impact thereby requiring an EIS when GU was required to prepare an EIS for its entry off Canal Road. We believe that the Park Service should prepare an EIS, and in fact, this proposed boathouse should be combined with a more comprehensive planning and environmental review for the entire Georgetown Waterfront Plan.

4. Boathouse Would Damage Natural and Recreational Resources

The proposed boathouse would harm the natural and recreational resources of the C&O Canal National Historical Park, and the EA fails to adequately evaluate these impacts. In particular, the preferred alternative lacks a detailed analysis of impacts on park resources. The boathouse would destroy wetlands that protect the river and provide habitat for wildlife. The removal of trees and the boathouse's "flow through" design would remove nature's protection from flood-borne debris to all downstream edifices. It would be located in a floodplain, and periodic flooding could release chemical pollution from the rowing tank and air conditioning in the boathouse. It would impact the view from the CCT, the Towpath, the Key Bridge, the George Washington Parkway, the Potomac Gorge, the American Discovery Trail and the Potomac Heritage Trail.

The Capital Crescent Trail and the C&O Canal Towpath provide high quality hiking, bicycling, jogging, and nature observation experience for hundreds of thousands of users each year. Construction of a large boathouse would constrict the CCT, reduce views from the C&O Canal, and block the CCT during construction, maintenance, servicing of the facility and periodically thereafter during athletic and social events (which will certainly occur, despite the EA's attempt to ignore or minimize them). Safety issues associated with traffic from the boathouse, both during construction and operation, have not been fully analyzed in the EA. Finally, the 75-foot long dock extending into the river would block the route of shoreline boaters, contribute to river bottom silting, and adversely affect wildlife.

5. Needs Analysis is Skewed

The EA is fundamentally flawed in its baseline assumption that GU “needs” a boathouse that would have a footprint of more than 18,000 square-feet when a far smaller boathouse would meet the university’s needs. Other comparisons and studies, including those used in the early stages of planning for the GU boathouse, suggest that 4,000 square feet would be sufficient to meet GU’s needs.

6. Alternative Locations, “Universal” Boathouse Alternative Not Considered

The EA fails to seriously consider alternative locations outside the C&O Canal National Historical Park or even mention the Georgetown “Universal” Boathouse proposed for 34th and K/Water Streets and suggested during the scoping session for the EA. Such a facility at a more accessible location on degraded land outside the historical park, would be financed by the universities and shared by high school rowing programs and the general public, like Thompson’s Boat Center.

Conclusion

We urge the National Park Service to stand up for the public interest by selecting Option D, the “No Build” Alternative, to keep private development out of our public parkland.

We are very concerned that the Environmental Assessment fails to adequately address numerous significant issues, and we are just as concerned that the National Park Service’s processes for involving the public – during and preceding the EA preparation – have been too little and too late, giving the appearance that the proposed land exchange and boathouse development in the C&O National Historical Park were preordained.

We strongly urge the National Park Service to abandon efforts to trade away prime public parkland at the entrance to the C&O Canal National Historical Park in order to facilitate private development by Georgetown University. Instead, we urge the National Park Service and Georgetown University to re-focus their efforts on identifying an alternative location down river – and outside of the national historical park – that would not be so highly controversial.

Short of this common-sense approach, we urge the National Park Service to abandon its Environmental Assessment and instead prepare a more comprehensive Environmental Impact Statement.

Respectfully submitted,



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