



P.O. Box 30703
Bethesda, MD 20824

June 12, 2006

Superintendent Kevin Brandt
Chesapeake & Ohio Canal NHP
1850 Dual Highway, Suite 100
Hagerstown, MD 21740

Re: Environmental Assessment For the Georgetown University Boathouse

Superintendent Brandt,

I am writing to you on behalf of the Board of the Coalition for the Capital Crescent Trail (CCCT), our 2200 members, and the general public, which annually makes approximately 1,000,000 user visits to the Capital Crescent Trail (CCT), to comment on the recently released Environmental Assessment (EA) for the proposed Georgetown University (GU) boathouse (GUB). The CCCT has worked with the NPS since 1986 to acquire the former CSX railroad's Georgetown Branch ROW within the District of Columbia (DC), and convert it to a first class trail, used daily by thousands of walkers, runners, and bicyclists from DC, its Maryland and Virginia suburbs, and, indeed, many national and international visitors to this area. Among its many recognitions, the CCT was recently cited by the Project for Public Spaces (PPS), an international nonprofit organization dedicated to creating and sustaining public places that build communities, as one of the "21 great places (around the world) that show how (varying modes of) transportation can enliven a community". In its recognition the PPS described the CCT as "the most used rail-trail in the nation...A green oasis in the midst of traffic clogged suburbia, which connects suburban Maryland to the Potomac waterfront, with many natural and historic destinations in between". It is our sincere hope that that description still applies once the issues surrounding the GUB have been resolved.

The National Park Service (NPS) acquired the 4.3 miles of the CCT lying within DC in 1990, and the Trail was developed as a component of the C & O Canal National Historic Park (C&OCNHP). The proposed site for the GUB is currently part of the C&OCNHP, and abuts the CCT for approximately 490' (EA, pg II-6), beginning approximately 500' up the CCT from the abutment for the old Aqueduct Bridge. The proposed site also has approximately 490' of river frontage. The upriver end of the property on which the boathouse is to be sited is approximately 1350' upriver from the Key Bridge. This EA is being done as part of a proposed land exchange between the NPS and GU, in which GU would transfer to the NPS, in exchange for the land on the proposed site, a parcel of land of approximately the same acreage, also abutting the CCT, and located approximately ¾ of a mile further upriver than the proposed site. That parcel abuts the CCT for 1066', has a width of 45', and has approximately 400' of river frontage, as shown on a survey plat from Kidde Consultants, Inc., dated September 1989. As part of the exchange GU would also release an access easement to that upriver site.

In general we find the EA document to be so biased towards a pre-ordained conclusion as to be totally without merit. It makes reference to certain documents when they help support that conclusion, but ignores them when they do not. It draws conclusions that are contradicted by the very data presented in its findings. It includes documents with false assumptions to help bolster the case it is clearly trying to make. And rather than making an objective evaluation of what is possible without causing significant damage to the C&OCNHP, it takes at face value what the University specifies as its "minimum" needs, and justifies the sacrifices of the public based on those requirements. While the CCCT believes there is some benefit to the public in having NPS acquire GU's upriver property, and extinguishing the easement to it, the rationale for a land swap to accomplish this must be to protect the park. Given that the EA only implies, and in no way demonstrates any damage to the C&OCNHP from Option-D (no build), while clearly demonstrating that Alternatives A, B, and C would each cause significant adverse impacts on the C&OCNHP, we must conclude that the only option presented in the EA that doesn't present a net environmental loss to the public is the no-build option. We do feel that there may be designs for this site, using a significantly smaller building, or buildings, which could alleviate many of the adverse effects identified in this EA, such as impacts on parkland views, dangerously high increases in river flow velocities during flooding, and crowding on the very busy gateway section of the CCT, but buildings of the sizes presented in the EA are totally inappropriate for this historical, and environmentally sensitive site.

If this project is to go forward, we believe that a comprehensive and unbiased Environmental Impact Statement must be generated for the entire Georgetown Waterfront Park and Boathouse Zone, so that a proper evaluation of impacts to the C&OCNHP and the Waterfront Park can be studied to assure the public's use and enjoyment of both of these federally protected parks.

Please note our Specific Issues with the EA given below.

Sincerely,

Ernie Brooks
Chair, Coalition for the Capital Crescent Trail
contact@cctrail.org
(202) 234-4874

Specific Issues With the EA

Parkland Views

While reducing the heights of the building from what was approved by the DC Zoning Commission has alleviated the overwhelming intrusion of the building into the environment of the C&OCNHP, the rooflines in the Preferred Alternative (Option-C) still completely block views of the river from the towpath, and the 280' long structure forms a monolithic wall between users of the CCT and the river. Any building placed on the proposed site should be scaled to the same size as the adjacent historical structures – the Washington Canoe Club and the C&O Canal embankment.

Increased River Velocity

The Hydrological Conditions Report in Appendix P (found on the included CD, but not in the printed document) states in its Conclusions (page 5), "The results of this study show that there is no significant change to flow characteristics studied **as a result of the construction of the boathouse**. Water surface elevations for this reach of the Potomac River, **velocities**, and shear

stress amounts **vary only slightly at the proposed building** and do not change at all at the Washington Canoe Club building.” Again, on page ES-6, in the printed document, under Physical/Biological Resources for Alternatives A, B, and C, the EA states “A hydraulic impact analysis to assess the impacts of a boathouse concluded that ...velocities...of the river in flood conditions...would change very slightly at the C&O Canal embankment.” At the same time the data in Table 3 of Appendix P (page 5) shows that the velocity of the river against the Canal embankment goes from 5.32 ft/sec before construction at the upstream end of the proposed building (cross section N1), to 7.33 ft/sec after construction (a 38% increase), and from 3.53 ft/sec before construction at the downstream end of the proposed building (cross section M1) to 6.97 ft/sec after construction (a 98% increase). It is clear that the conclusions drawn do not reflect the data presented, and the significant increases in flow velocities due to the construction of any of the presented alternatives pose serious threats to the Canal and its embankment, as well as the CCT itself.

Crowding On the Gateway Section Of the CCT

Because of the unnecessarily large footprint of Alternatives A, B, or C, the proposed shared-use entranceway to the boathouse (vehicles pulling 60' long boat trailers and boathouse service vehicles would share a widened paved area with trail users – see *Access to Boathouse*, page II-6) remains within the CCT Right-of-Way (ROW) from its beginning at the end of Water Street (K Street) to the end of the proposed boathouse site, a distance of some 800'. Smaller building footprints would allow the boathouse drive to be transitioned from the CCT ROW onto the proposed GU site, cutting the shared-use length by more than half. Given the number of CCT users, higher on weekends, but substantial on weekday mornings & evenings as well, any possible conflicts between vehicles accessing the boathouse and trail users in this narrow corridor should be minimized, without imposing limitations on the CCT width (actual or effective) in the process.

The EA makes no statements regarding actual volume of vehicular access to the site, only stating what periods will see the heaviest use. In order to assess the impact of this vehicular use, numbers of trips must be accurately stated. In addition, the EA states on page II-7 that “the facility will be precluded from use for social functions other than **occasional** gatherings of Georgetown University crew team members, **personnel, or alumni.**” For purposes of analyzing the impact on an already crowded public recreational area, it would seem appropriate to state a likely numerical range in place of the ambiguous “occasional”, and opening up social use to University personnel and alumni certainly puts no limit on the number of gatherings which could occur. It is totally inappropriate for the NPS to allow any social gatherings to occur at a boathouse on this site, with the possible exception of a very limited number involving crew team specific functions, and those should require advance notice to C&OCNHP officials for their approval.

Construction Impacts On the C&OCNHP

Nowhere in the EA are construction impacts studied. Clearly the CCT will be out of commission for some time, but that is never mentioned. When the Arizona Avenue trestle on the CCT was rehabilitated in the mid-90's, we were told that the project would take 6 months. In the end the trail was severed for nearly 18 months due to that construction. A retained evaluation of the closing of the CCT during construction needs to be included in the EA, and should this project ultimately go forward, completion bonds guaranteeing the time limits for such a closure should be put in place. In addition, the EA fails to evaluate the impacts of boathouse construction on the Canal embankment. The effect of thousands of construction trucks entering and leaving the site, as well as construction techniques such as driving foundation pilings for the boathouse must be evaluated as part of this EA. Damage to the Canal embankment would have devastating impacts on users of both the CCT and Canal Towpath, and measures must be taken to insure its continued viability.

Alternative Sites

In the discussion of Alternative Sites, specifically East of 34th Street (page II-24), the EA states, in part, "Locating a boathouse for the University in this location would require modifying the *Georgetown Waterfront Park Plan*, a planning effort that has been ongoing since 1987 when the plan was approved by several agencies..." It appears that the approved 1987 plan is worth referring to when the EA is putting limits on alternative sites. However, that same 1987 plan shows a boathouse on the site under study in this EA with a footprint of 4000 sq. ft., and it states that "The area assigned to boathouses does not extend west of Key Bridge more than 1000 feet because of the policy aimed at preservation of the natural appearance of the Palisades". These facts are omitted when discussing use of the proposed site. If the approved 1987 Master Plan for the Georgetown Waterfront and Non-motorized Boathouse Zone can be ignored in allowing a 4000 sq. ft. footprint boathouse to grow to nearly 19,000 sq. ft., and the location of a boathouse can go from a maximum of 1000' west of Key Bridge to 1250' west of Key Bridge for the proposed boathouse (the property line for the proposed site is actually some 1350' west of Key Bridge), then we fail to see why the eastern limit to the boathouse zone does not have comparable flexibility. When testifying before the DC Council's Committee on Public Works and the Environment in June of 2005, NPS official John Parsons responded when asked about that western limit, "We felt it was a general guideline as opposed to a hard line in the woods". If the limits placed on the boathouse zone in the 1987 plan are considered a "general guideline" when considering incursions into a National Historic Park, surely the limits placed on incursions into newly acquired parkland, currently in a degraded industrial condition, should be no less flexible.

Damage To the C&OCNHP From Use of GU's Upriver Site

In Section 2.4 (page ii-17), Alternative D – No Action Alternative, the EA makes reference to the possibility of GU building a boathouse on their upriver holding (see paragraph two of this document), or the possibility of the property being developed for commercial or light manufacturing use. This potential development is held out as justification for the proposed land exchange that gave rise to the EA, but no examination is made of the actual feasibility of any development on this site. In the following section, 2.5 Alternatives Considered But Rejected, there is a discussion of a possible boathouse on the upriver site. That discussion makes reference to a 1992 Feasibility Study, but only two drawings are reproduced from that study. Unfortunately, the architects who prepared those drawings must have been unfamiliar with GU's actual property rights, and they've extended the University's easement rights some 800' beyond where they end, making the concept depicted invalid. No valid concept for a boathouse, or any other development, has ever been put forth for this property. How can NPS assess the possible damage to the C&OCNHP from development on this upriver site without a genuine depiction of what is possible on that very challenged site?