

## **Georgetown University boathouse proposal-National Park Service PEPC Project #15645: Scoping points (Issues/Impacts, Alternatives and Process)**

(Send scoping comments/letter to [NCR\\_Georgetownboathouse@nps.gov](mailto:NCR_Georgetownboathouse@nps.gov) or via project website <http://parkplanning.nps.gov/projectHome.cfm?parkID=177&projectId=15645> or by regular mail to Kevin Brandt, Superintendent, C&O Canal NH Park, 1850 Dual Highway, Suite 100, Hagerstown, Maryland 21742) See sample letter at [www.savethecanal.org](http://www.savethecanal.org) “News Flash”

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 National Historical Park, 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 National Historical Park, 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 at the site of the two alternatives for a proposed private GU boathouse within the C&O Canal National Historical Park.
- 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 National Historical Park 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 which runs underground at the site is ruptured.

K Public controversy 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 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" (mixed use) 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 important and necessary for two private universities to build their own collegiate facilities, with private ownership of the waterfront land, then consider placing the boathouses next to each other, at 34th/Water Sts. or at another accessible site outside the C&O.

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 National Historical Park 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 National Historical Park 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 National Historical Park. 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.

### **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 universi

2. A proper review in terms of legislative intent and history for the C&O Canal National Historical Park, 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 from the DC gateway 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 NHP, 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 National Historical Park Advisory Commission, an official body established by Congress to advise on matters affecting the Park.

7. Recognition that the C&O Canal National Historical Park 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 NHP; whether it improves the C&OCNHP; 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 consult DC, Maryland and Virginia State Historic Preservation Offices.

11. Consult with local government officials in areas that border the C&OCNHP, such as DC and Montgomery County, as well as in other areas affected by the proposals, such as Arlington and Frederick County.

12. Consult with NPS safety, natural resource and historic preservation specialists about impacts.

13. Consult with ANC3D (border neighborhoods of the C&OCNHP which include the GU-held land in their district).

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

The end