

**TO: Carol Schwartz, Chair, Committee on Public Works and the Environment, 1350 Pennsylvania Ave., NW, Washington, DC 20004**

**Please make this document part of the public record of the Public Oversight Roundtable on Proposed Construction of Georgetown University Boathouse, Wednesday, June 22, 2005.**

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**Comments on Ill-Conceived Plan to Site Private Boathouse in DC National Park**

**Submitted by Amber Jones**

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**THE FEDERAL AND LOCAL PARKS MISSION**

Because the city of DC contains within its borders a significant share of national parkland, the city shares with the federal government the responsibility for stewardship of this publicly owned and managed property. The portion of C&O Canal National Historical Park that is within DC's borders is a tremendous asset to the city, with significant historical and cultural value, and economic value due to its ability to draw tourists.

I urge the DC Council to take a stand in encouraging the National Park Service to protect and preserve the C&O park in accordance with the Park Service's legislated mission, which is "*...to promote and regulate the use of the...national parks...to conserve the scenery and the natural and historic objects and the wild life 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 proposal to site a large recreational facility for private use in a portion of the C&O Canal National Historical Park that is heavily used by the public is contrary to the Park Service mission, as follows:

1) Construction of the massive Georgetown University boathouse at the designated site inside the park will destroy -- not conserve -- natural objects such as trees and vegetation that provide wildlife habitat and natural floodwater controls.

2) Although some believe the design is aesthetically pleasing, I think it is too big and too prominently placed in an otherwise natural area, thus destroying the scenery.

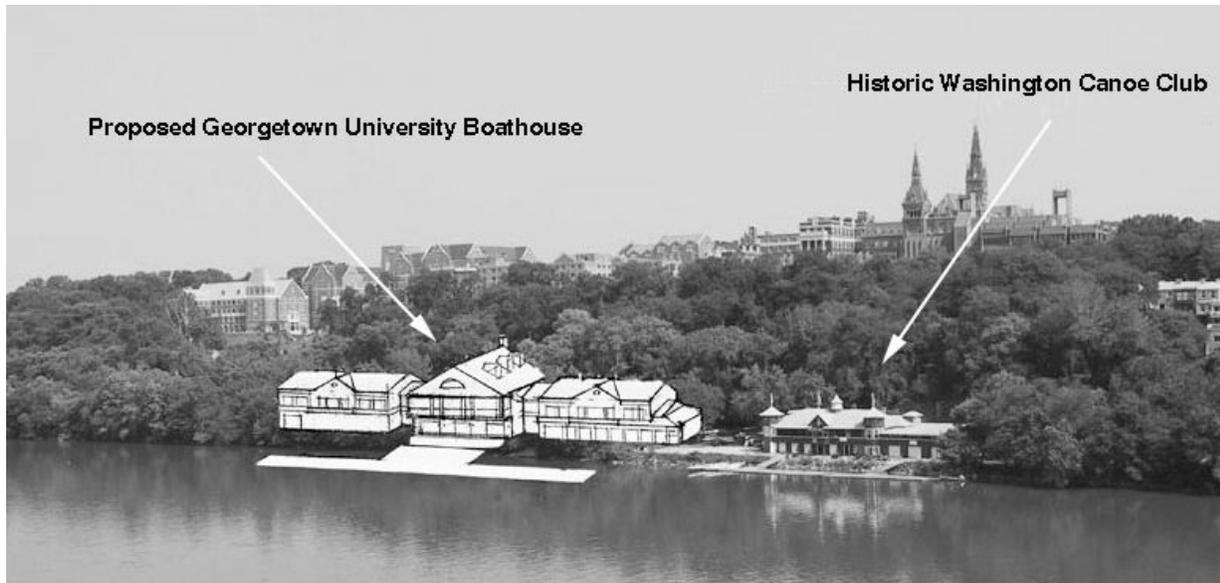
3) The structure as planned threatens several historical features: the C&O Canal embankment and towpath would be threatened by the narrow channeling of floodwaters between the building and the embankment; historical buildings downstream, including the Washington Canoe Club, would be threatened by eddies created by the Georgetown University docks extended far into the river, and the pastoral nature of this historical park -- intended by Justice William O. Douglas to be preserved in a relatively natural state -- would be sacrificed to concrete and congestion.

4) The plan would leave the beautiful serene parkland "impaired" and would provide "enjoyment" only for select members of an exclusive university community (most of whom are temporary DC residents for only a few short years), rather than for the public to whom the land rightfully belongs.

In fact, the plan could actually hurt people, in that it poses safety hazards to bikers and hikers forced to tangle with large boat trailers and to recreational boaters tangling with large docks and competitive boat crews.

## **THE POTENTIAL IMPACTS OF THIS BOATHOUSE**

The sketch below, provided by a coalition of non-profit groups called Defenders of Potomac River Parkland, illustrates the Georgetown boathouse as currently proposed – many times larger than the adjacent century-old Washington Canoe Club, crowded into a narrow and heavily-used corridor of national parkland, and towering above at nearly double the height of the C&O Canal towpath.



Some of the impacts are immediately obvious – the view from the river and from the Virginia shore, the impact on the riverbank, the amount of vegetation to be removed, the potential structural danger to adjacent historic structures during construction. Other impacts are not as obvious – the restriction of access to the Capital Crescent Trail heavily used by bicycle commuters and weekend enthusiasts; the potential for erosion, silting, and increased floodwater flow; and the obstruction of river views from the C&O Canal and towpath and Canal Road. The enormous size in comparison to the adjacent facility, which has managed to train nearly 30 Olympic champions in canoeing and kayaking in the last 70 years in its small space, raises questions about the need for such a large facility for one private university.

According to the National Park Service's Director's Order 12 (DO-12), on Conservation Planning, Environmental Impact Analysis, and Decision Making, the Park Service is obligated by the National Environmental Policy Act to prepare "*an in-depth study of the impacts of major federal actions having a significant effect on the environment and alternatives to those actions.*"

To date, the Park Service has resisted this requirement for an Environmental Impact Statement (EIS). Earlier this year, prompted by public outcry and a lawsuit by two of the citizen organizations in the coalition Defenders of Potomac River Parkland, the Park Service agreed to prepare a lesser study, an Environmental Assessment (EA), which is a superficial substitute. The Park Service has indicated at public meetings that the EA will not consider alternative sites, although it may consider alternative sizes/designs. Also, several organizations in the Defenders of Potomac River Parkland

coalition have indicated that the EA will not adequately address the DC historical review requirements.

At a minimum, to help prevent future controversy and legal measures, I urge the DC Council to demand a more in-depth study; i.e., an Environmental Impact Statement. Even the public-use boathouse proposed on the waterfront in Arlington, Virginia -- almost directly across the river -- is getting an EIS.

## **CONSIDERATION OF ALTERNATIVES**

An even better plan than merely insisting on an EIS would be for the DC Council to use its review of this issue as an opportunity to step back and examine the total need for public and private boathouses by residents and students of DC and surrounding communities, and consider alternate plans that serve the interests of a broader range of constituencies. Moving forward quickly on one private facility that is generating controversy due to its ill-conceived location, its lack of benefit for residents of DC and the general public, and its overpowering -- and probably unnecessary -- size seems a misconstrued policy on the part of both the federal and city governments.

There is plenty of already-developed (i.e., paved and degraded) waterfront downstream of the C&O Park in Georgetown, and in other locations along the Potomac and Anacostia Rivers, that would be vastly improved by the additional of a string of beautiful private and public boathouses and their associated activities. Why destroy instead a pastoral, historically significant, wooded patch of green open space inside a park deliberately set aside for preservation?

As the DC Council considers the possibility of a better location for the Georgetown University boathouse, I hope that the Council will also consider either a more reasonable size or, better yet, a combined facility that serves more than one private/public university, local high schools, and/or members of the general public, as does Thompson's Boathouse farther downstream.

Thank you for the opportunity to comment on this issue.

Sincerely,

Amber Jones