

March 14, 2012

Mr. Peter May
Associate Regional Director
National Capital Region
National Park Service
C/o Tammy Stidham
1100 Ohio Drive, SW
Washington, D.C 20242

Dear Mr. May,

Here are my comments on the NPS boathouse zone study that is currently being conducted under your direction.

It is important to keep in mind that the difficult issues that have swirled around the question of building boathouses along the Georgetown waterfront began with a false start. It is to be hoped that the Park Service this time will make a right start with its current feasibility study for a boating facility zone along the Georgetown waterfront.

The false start began when Georgetown University set out to convert part of a National Historical Park directly below the university into its private preserve. Its aim was to erect a giant boathouse there. Three “alternatives” were presented soaring up to 20,000 sq. ft. with several stories rising at their peak even higher than the adjacent C&O Canal berm, the towpath and the canal.

That the site was ill-suited to accommodate a large boating facility evidently was not seen as an obstacle to the project. The oversized building would have been crammed into a tight spot hardly accessible by motor vehicles and with scarcely any space available for parking and would create a hazardous chokepoint at a major entrance way to the national park that has an inflow of some four million visitors per annum. An influx of cyclists, joggers and hikers passes this point daily.

It is hard to believe that the U.S. Code on administering our national parks or the strictures of the legislation establishing the C&O Canal National Historical Park were given much attention as this plan was being advanced. The Code asserts that no activities are to be authorized “in derogation of the values and purposes for which these various areas have been established, except as may

have been directly and specifically provided by Congress.” [16 USC Sec 1-a-1 (2000)]. Public Law 91.064, which established the C&O Canal NHP, clearly states its purpose: “to preserve and interpret the historic and scenic features of the Chesapeake and Ohio Canal and to develop the potential of the canal for *public recreation* [emphasis added], including such restoration as may be needed.” The intent of the legislation is clear. It does not contemplate accommodating the boating program of private institutions or ceding any of its territory to such a purpose.

The misconceived boathouse plan, which came close to realization as the “preferred alternative” of a draft Environmental Assessment, should not be considered as a possible outcome in the NPS study of the feasibility of boating facilities along the stipulated “zone” along the Georgetown waterfront. It should be clear that the site GU has sought in the past ought to be off limits, and that sites on the other side of Key Bridge are both defensible and appropriate for team rowing facilities

All best regards,

Carl Linden