

October 5, 2005

Director Fran Mainella
The National Park Service
1849 C Street, NW
Washington, DC 24240

Dear Director Mainella:

Your Washington Region, presumably at the initiative of John Parsons, is putting the cart before the horse. Construction work on the waterfront downstream of Key Bridge ought not to commence until a full Environmental Impact Statement is prepared.

If the motive for starting construction is to preclude the possibility of locating the proposed Georgetown boathouse in the boating zone below Key Bridge, it can only be seen as a blatant attempt to skirt what NPS rules and regulations demand: namely, that other alternatives beyond the one favored by advocates of a particular alternative must be impartially evaluated. This must be the case whether the advocates are NPS officials or interested parties outside the park service, or both. Otherwise, such advocates become the judges and executors in their own cause.

In this case the advocates in question want to put the Georgetown boathouse in national park land directly below the university and to convert that land into a private holding. Are they making the unwarranted presumption that closing out through construction any site for the boathouse below Key Bridge supports the argument that the only alternative is to appropriate national park land for the boathouse.

What is at stake can not so easily be disposed of: The question remains: How can Georgetown University's proposed appropriation of national park land for a private boathouse be justified in terms of the fundamental NPS responsibility to preserve our national parks for public use?

An EIS is mandatory when a proposed project involves significant human and environmental impacts as well as substantial public controversy. All three of these factors are at play in the proposed boathouse. Under an EIS finding a location for the boathouse outside the national park has to be openly and dispassionately weighed and examined, if not simply required by the very nature of the case.

Suspicion of the motives of the proponents of the GU boathouse project is now rife as a result of the questionable means and tactics which the advocates of the project have employed in pursuit of their goal. Some of these are: a dubious and inequitable proposed land swap, failure to take into serious account the NEPA requirements for an EIS, deceptive illustrations of the structure making it appear smaller than it is, implausible denials that the great hall of the boathouse would be a prime site for university parties, receptions and other gatherings serving university interests, the unheard of zoning of national park property for private development before any transfer of that property into

private hands has occurred, failure to keep the C&O Canal Commission advised on project developments and submitting incorrect data on the project to the Commission, claiming Commission approval of the plans when it had not been given, and the general failure to keep interested parties and the public properly informed of the ever growing scale of the project. These are only a few examples of NPS and GU conduct which has cast a shadow of scandal on Georgetown's boathouse project and the NPS' unquestioning promotion of it.

An EIS is in order and a full and public review of the whole waterfront project is now necessary. To do otherwise would be an abdication of your responsibility as Director of the National Park Service and as the protector of the integrity of our national park system. What is at issue is more than a local matter but implicates the mission of the National Park Service as a whole. Your decisions on this question will be fateful for the future of our national parks. Will they continue to serve all the people or will they be increasingly intruded upon by the importunities of influential private interests? The choice is yours and I trust that you will make the right one. I wish you well.

Sincerely,

Carl A. Linden
Former President
C&O Canal Association