

Mr. Kevin Brandt
Superintendent
C&O Canal National Historical Park
1850 Dual Highway, Suite 100
Hagerstown, MD 21740-6620

Re: Georgetown University Boathouse Environmental Assessment

Dear Mr. Brandt:

This letter is the Potomac Conservancy's response to the National Park Service's request for public comment on the Georgetown University Boathouse Environmental Assessment (EA). Since 1993, the Potomac Conservancy has been protecting the health, beauty, and enjoyment of the Potomac River and its tributaries. The Potomac Conservancy seeks to provide comprehensive solutions to the complex challenges facing the Potomac River and its watershed lands.

We have carefully reviewed the EA and concluded that its analysis is lacking in several important respects. Moreover, the EA fails to adequately consider all of the available alternatives to and potential impacts of the construction of a private boathouse on land that is currently within the C&O Canal National Historical Park. Without a more complete and accurate study, the Park Service cannot make a fully informed decision regarding the proposed boathouse, as required by the National Environmental Policy Act (NEPA). Therefore, the Potomac Conservancy requests that a full Environmental Impact Statement (EIS) be prepared.

In addition, the Potomac Conservancy would like to express its concern regarding the inappropriate and irresponsible boathouse/entertainment complex plans proposed in the EA. While the Potomac Conservancy recognizes the need for more and better river access for rowers, and is a strong advocate for recreation on the river, the proposed structure is poorly sited and scaled. Currently, other boathouses are being planned downriver of this proposed site and yet scant attention is given to this opportunity to minimize impact to the natural and human environment of the C&O Canal National Historical Park and Capital Crescent Trail used by wildlife, hikers, bikers, anglers, recreational boaters, and tourists.

Finally, Potomac Conservancy has been working with the National Park Service to address the myriad of challenges the C&O Canal NHP is facing, most notably the accelerating number of encroachments onto public park land. These impacts, when taken alone, may seem to do little harm to the integrity of the park environment and experience, yet when considered cumulatively, the implications for the park are grave. The proposed land swap and boathouse/entertainment complex represent the largest single insult to this world-class, but increasingly threatened landscape.

We have divided our comments into two sections. In the first section, we provide general comments regarding the boathouse proposal. In the second section, we provide specific comments regarding the EA itself.

I. General comments on the proposed boathouse.

- A. The Park Service has provided no evidence that the proposed land-swap is a fair and equal trade and the nature of the trade creates an unacceptable precedent.

As far as the Potomac Conservancy is aware, the Park Service has provided no evidence that the proposed land-swap is a fair and equal trade. The EA refers to it only as a “one-for-one” trade. This is true if one equates one-for-one with area-to-area, since the NPS-owned parcel and Georgetown University-owned parcel are roughly the same size. However, the proper basis for valuing land is its fair market value, not square footage. It does not appear that the Park Service has obtained an appraisal for either parcel of land, and if it has, it has not shared those appraisal values with the public. Without an appraisal of the fair market value of the properties, there is no way for the Park Service or the public to judge whether the proposed land swap is in fact a fair deal. Therefore, the Potomac Conservancy requests that the Park Service retain an experienced real estate appraiser to provide it with reliable estimates of the value of both parcels at issue in this case.

The nature of this trade and the controversy it has engendered should, at the very least, cause the Park Service to perform an EIS before setting such a precedent. In fact, it is National Park Service policy to do so. Director’s Order 12 (DO-12) provides that an EIS is appropriate where a proposed project “may establish a precedent for future actions with significant effects.” Therefore, the Potomac Conservancy requests that, at a minimum, an EIS be performed before any action on the boathouse is taken.

- B. The proposed boathouse is both poorly sited and poorly scaled, and no sufficient explanation has been provided for why this can’t be changed.

The proposed boathouse is poorly sited and scaled given the context of the C&O Canal National Historical Park. Locating Georgetown’s private boathouse, through a questionable land exchange (see below), on land formerly within the C&O Canal National Park is not appropriate for many reasons: it creates unacceptable precedent (see below for further discussion); it eliminates public access to the C&O Canal, canal towpath, and Capital Crescent Trail (CCT) from the waters edge at the boathouse site; it eliminates shoreline access for boaters and anglers; it blocks the view of the Potomac River from the towpath and CCT, destroys shoreline habitat, and converts what is currently a natural, wooded environment into a built environment.

Even were the siting of the boathouse acceptable, the proposed size of the boathouse is not. First, it is utterly out of scale with the rest of its surroundings. The photo simulations contained in Chapter 4 of the EA make it clear that the proposed boathouse, regardless of the build alternative selected, would dwarf the historic Washington Canoe Club (WCC), its immediate neighbor. This is inappropriate from both an aesthetic and an historic preservation viewpoint. The only buildings of comparable size in the immediate area are located high up on the hillside, and are partially concealed by the treeline along the C&O Canal. Second, the proposed boathouse is so large that it would become the predominant feature of a shoreline that is currently characterized by the natural vegetation of the C&O Canal National Historical Park and the relatively small, historic WCC building. The proposed 75 foot long dock paralleling the shoreline would only exacerbate this problem.

According to the EA, it is the size of the boathouse that is driving its proposed location. Presumably, therefore, reducing the size of the boathouse would open up other possible sites, simultaneously solving both the poor siting and scaling problems of the current proposal. The EA justifies its failure to consider smaller sites and designs based entirely on Georgetown University's assertion that anything smaller will not satisfy its rowing program's needs.

In light of the fact that reducing the size of the boathouse (and thereby opening up alternate locations) could solve many of the Potomac Conservancy's objections to the project, we are concerned that the Park Service appears to have placed the University's stated needs above the public interest.

Furthermore, NPS does not appear to have seriously inquired into Georgetown University's actual needs, and what compromises might be made. Georgetown asserts that any boathouse smaller than the Preferred Alternative is not large enough to meet its needs, but an examination of the university's current program and other comparable programs belies that assertion. Georgetown currently owns 20 shells for its teams' use, of which only 16 are actually used.* The current boathouse proposal, however, demands storage space for no less than 40 shells. The only boathouses in the nation that are comparable to Georgetown's proposed boathouse are those of Harvard and Princeton, and Princeton shares their space with the U.S. national rowing team.

The Park Service should not unquestioningly make national parkland available to accommodate Georgetown's desire for a boathouse. The Park Service needs to take a critical look at exactly what compromises might be made both with regards to the siting and scale of the proposed boathouse before it moves forward with any plans.

- C. The proposed boathouse is in direct conflict with the mission of the National Park Service in general, and the C&O Canal Historical Park in particular.

The proposed boathouse is in direct conflict with the mission of the National Park Service in general, and the C&O Canal Historical Park particularly. One of the basic

* As explained by a representative of Georgetown University, at the May 19, 2003 zoning hearings.

principles of our national park system is that the resources under NPS stewardship belong to all Americans. Thus, by definition, recreational resources located in national parks should be freely accessible to the public. The proposed boathouse, in contrast, would be located on what would otherwise have been national parkland, but would belong solely to Georgetown University. It would provide absolutely no public recreation or services, thereby eliminating the possibility of using this location for its intended purpose. This directly conflicts with the Park Service's duty to conserve national parklands for the enjoyment of the public, as mandated in the National Parks Organic Act, 16 U.S.C. § 1 (2000).

In addition, the boathouse proposal directly conflicts with the mission of the C&O Canal National Historical Park. Congress created the park in order 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.” 16 U.S.C. § 410y (2000). The proposed boathouse, however, would provide only private recreation, would destroy over 200 feet of natural shoreline, would compromise the historic context of the eastern end of the C&O Canal park, and would block scenic views of the river from the towpath and CCT.

II. Specific comments on the Environmental Assessment.

A. The scope of the Environmental Assessment is too limited.

The scope of the Environmental Assessment is too limited. By failing to fully examine build alternatives outside the C&O Canal National Park, the EA puts artificial blinders on the Park Service's decision-making process. Without a meaningful evaluation of other alternatives, and an improved evaluation of the no-action alternative, the Park Service cannot make a fully-informed decision about the boathouse, as the law requires.

As the EA itself notes, DO-12 states that an EA must examine “a range of reasonable alternatives that meet objectives laid out in the purpose and need, and that reduce or eliminate impacts to important environmental resources.” Although the EA may technically conform with this directive, it fails to satisfy the directive's spirit and underlying purpose by heavily favoring “purpose and need” over “impacts”. Build alternatives located outside the national park would eliminate most of the boathouse's major impacts, but are summarily rejected in the EA because they would necessitate a smaller boathouse that would not meet Georgetown University's stated needs. As discussed in detail above, the “needs” identified in the EA are simply Georgetown's boathouse wishlist, and not a thoughtful list of requirements for a riverfront location. Instead, only in-park alternatives that meet all or most of Georgetown's wishlist are considered, despite the fact that they would result in substantially more environmental impacts than other alternatives. Thus, by heavily favoring “need” over “impacts” in determining which alternatives to evaluate in the EA, the Park Service is artificially and inexplicably limiting its understanding and serious consideration of environmentally-preferable boathouse locations outside the national park boundaries. The result is an EA

that considers only all-or-nothing alternatives—build an enormous boathouse in the national park, or don't build at all.

This “all-or-nothing” approach does not reflect reality, and more importantly, it does not reflect the Park Service’s mandate. It does not reflect reality because as the EA itself notes, there are multiple potential boathouse locations outside the park. One of these (the “Jack’s Boathouse” option) would provide space for up to 36 eight-person shells, only four fewer than the requested 40. In other words, multiple compromise locations and designs are possible, but the EA chose to exclude all of them from consideration.

This all-or-nothing approach also results in an EA that fails to fully examine which of the possible alternatives best serves the *Park Service’s*, and by extension, the public’s interest, which is the purpose of performing an EA in the first place. The Park Service’s sole interest in the boathouse project is, or should be, the protection and conservation of the C&O Canal National Historical Park. Presumably either the “No Action” alternative or a compromise location outside the park would result in the fewest impacts to the park, and thus best serve the Park Service’s interests, because there would be no development at all within the park. While this would leave open the possibility of Georgetown’s upstream parcel being developed, the harms associated with such development are entirely speculative, and as argued below, poorly studied in the EA. By failing to examine compromise locations and designs, the EA artificially blinds the Park Service to alternatives which may serve its interests better than the all-or-nothing alternatives presented.

Therefore, the Potomac Conservancy requests that the Park Service perform a full EIS that considers multiple boathouse alternatives, including out-of-park locations. By doing so, the Park Service will fully inform itself about the impacts to park interests of all the available alternatives, and not simply rely on the artificially narrow and often ill-examined alternatives presented in the EA.

B. Failure to determine the actual development potential of Georgetown’s upstream parcel calls into question the validity of the entire “No Action” impacts analysis.

Failure to determine the actual development potential of Georgetown’s upstream parcel calls into question the validity of the entire “No Action” impacts analysis. All of the “No Action” analyses in Chapter 4 are premised on the potential development of the upstream site, either as a boathouse or for commercial/light industrial purposes. Although both types of development are theoretically possible, the EA fails to determine whether either is actually feasible and/or practical.

The presumption that the upstream parcel could be developed with a boathouse appears to be based on a “feasibility study” performed by Georgetown University’s architects. This feasibility study has not been released to the public, other than the two illustrations contained in Chapter 2 of the EA. Without seeing the complete feasibility

study, it is impossible for the public or the Park Service to determine whether a boathouse could or would actually be built on the upstream parcel. In reality, environmental conditions and physical limitations could easily make boathouse development on the site unfeasible or impractical. The EA makes a similar presumption with regards to potential commercial/light industrial development, by assuming that such development could occur simply because of the property's zoning. In reality, zoning is one of the least important factors in determining if commercial/industrial development is possible and feasible on the site. Park Service requirements, environmental laws, Corps of Engineers regulations, and a myriad of other factors would come into play. Unless the Park Service knows based on a factual investigation if and to what extent the upstream parcel could be developed, all of the "no build" impacts attributed to such development are pure speculation and inappropriate for inclusion in the EA.

Therefore, the Potomac Conservancy requests that the Park Service perform a thorough, factual investigation into the actual development potential of Georgetown's upstream lot. This should include providing the public with copies of Georgetown's previously-conducted feasibility study, as well as an independent, written investigation into the factors affecting development on the upstream lot. A professional appraisal of the parcel, which we requested in our comments above, would be a substantial step towards making such an investigation, as a good appraisal will consider the actual development potential of the parcel. The Potomac Conservancy furthermore requests that after this study is complete, the impacts associated with the "No Action" alternative be reexamined in light of the actual, not speculative, development potential of the upstream site. This reexamination would best be performed as part of a full EIS.

C. The cumulative impacts analysis is inadequate because it fails to consider any cumulative effects that are not associated with immediately related projects

The cumulative impacts analysis, Section 4.6 of the EA, is inadequate because it fails to consider any cumulative effects that are not associated with immediately related projects. The EA correctly states that CEQ regulations require an assessment of "connected, cumulative, and similar" impacts. However, it identifies only three actions as relevant to the cumulative impacts analysis—the Arlington County and GWU boathouses, and the Georgetown Waterfront Park. While these are the most "connected" and "similar" projects to the proposed boathouse, they are not the only actions that would result in "cumulative" impacts as defined by the CEQ regulations.

CEQ regulations define 'cumulative impact' as:

[T]he impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. 40 C.F.R. § 1508.7 (2005).

In other words, the CEQ regulations require a much broader examination of cumulative impacts than the highly constricted analysis the EA provides. For example, the EA fails to consider the “incremental impacts” of increasing shoreline development along both sides of the Potomac, and the collective impact it has on water quality, shoreline habitat, viewsheds, and more.

The EA also fails to consider cumulative impacts specific to the C&O Canal National Historical Park. For example, the recent tree cutting incident at the Dan Snyder property resulted in a great loss of trees and habitat, and other, similar incidents in the future are certainly foreseeable. Similarly, the proposed boathouse would clear-cut a large shoreline parcel of land within what is now land protected within the Park, also resulting in tree and habitat loss. Considered cumulatively, these actions and foreseeable, similar actions in the future represent a real threat to the park’s natural vegetation and habitat, but the EA does not consider them. Likewise, the EA does not consider the cumulative parkland loss associated with encroaching private use. The C&O Canal NHP currently does not have an accurate survey of its boundaries, and as a result, the Park Service believes that some of the adjacent private landowners have been encroaching on park property and assuming it for their own use. The EA fails to consider this in its cumulative impacts analysis.

The cumulative impacts analysis provided in the EA simply takes too narrow a view of the sources of cumulative impacts, and that constricted interpretation is not enough to satisfy regulatory requirements. Therefore, the Potomac Conservancy requests that the Park Service perform a new cumulative impacts analysis that considers *all* of the cumulative impacts associated with the proposed boathouse, as required by law. This analysis should be done as part of a comprehensive EIS.

- D. The EA inappropriately qualifies impacts to historic resources as “minor” by focusing solely on the proposed boathouse’s use, and ignoring its size and location.

The EA inappropriately qualifies impacts to historic resources as “minor” by focusing solely on the proposed boathouse’s use, and ignoring its size and location. “Minor” impacts are defined in the EA as “[not] interfering with the historic setting.” In contrast, “moderate” impacts “substantially diminish the historic character” through “visual intrusion,” and major impacts result from projects that are “highly noticeable within the historic context” and “interfere with the historic setting.” While the EA reasonably finds that the boathouse use in and of itself does not interfere with the historic setting of the area, it fails to consider how the grandiose scale of the proposed boathouse in conjunction with its location at the transition point between urbanized and non-urbanized environments negatively affects the area’s historic resources. While the boathouse *use* may “not interfere with the historic setting,” the boathouse *itself* would unquestionably be a “visual intrusion” and “highly noticeable within the historic context.”

To begin, the EA unfairly minimizes the potential for finding impacts by downplaying or ignoring the non-urbanized, natural historic setting immediately adjacent to the proposed boathouse. For example, two of the three historic areas specifically identified as affected in the EA are best qualified as scenic, forested areas: the Potomac Gorge and the Chesapeake and Ohio Canal National Historical Park. Despite this, the EA only analyzes historic resource impacts to two heavily urbanized areas: the Georgetown Waterfront, and the Georgetown University Campus. In reality, the proposed boathouse would stand at a critical transition point between the urbanized Georgetown Waterfront area to the east, and the vegetated shoreline of the C&O Canal National Park and natural cliffs of the Palisades above and to the west. As such, the proposed boathouse would affect urbanized and non-urbanized historic resources equally, and the EA analysis should—but doesn't—reflect that fact.

Even were we to assume that only urbanized historic settings would be affected, the EA still ignores the critical issue of historically appropriate scale. All of the historic buildings within and immediately surrounding the C&O Canal are built on a very modest scale. The lockhouses along the canal are tiny. The WCC building, which the EA equates in size to the proposed boathouse, is in fact significantly smaller than the proposed boathouse. The boathouse alternatives identified in the EA have a footprint four times the size of WCC's footprint, and stand 50 to 100 percent taller. The only buildings of remotely comparable size are located either on the far side of the aqueduct, which acts as a visual barrier, or on the Georgetown University campus where their size is masked by distance and tree lines. In other words, the proposed boathouse would be located in an area of limited and small-scale development that is physically and visually separated from areas with larger buildings. The boathouse would be the only large building in the immediate area, and would dwarf every structure around it (the WCC in particular). The EA fails to mention this radical difference in scale, allowing only that the proposed boathouse is "larger" than the WCC. This failure to address the effects of incompatible scale is an inexcusable defect in the EA.

The EA's conclusion that historic resources will not be significantly affected is further undermined by the fact that a new Memorandum of Agreement (MOA) between NPS, DC SHPO and the Advisory Council on Historic Preservation would be required for two of the three build alternatives. The MOA was originally agreed upon in order to minimize the boathouse's negative affect on historic properties in the area. The reason the MOA exists is to define what size boathouse is reasonable and acceptable in light of the historic context of the site. A boathouse that requires a new MOA must therefore be outside the bounds of what the Park Service has deemed acceptable, and consequently must have at least moderate to major historic resource impacts.

In sum, the EA incorrectly concludes that impacts to historic resources would be minor. It reaches this conclusion by focusing solely on the use of the boathouse and not the boathouse itself, mischaracterizing the urban v. natural environment affected by the boathouse, and by ignoring the very serious issues of incompatible scale. The conclusion is further called into question by the simple fact that two of three alternatives would require a new, more permissive MOA. The Potomac Conservancy believes that,

according to the definitions provided in the EA, impacts to historic resources are best characterized as moderate to major. Therefore, we request that the Park Service more fairly and comprehensively address the impacts to historic resources by performing a full-length EIS and Section 106 consultation.

E. The visual impacts analysis unreasonably underestimates visual impacts from the George Washington Parkway and Key Bridge, and fails to give proper weight to the major visual impacts along the CCT and C&O Canal towpath.

The visual impacts analysis unreasonably underestimates visual impacts from the George Washington Parkway and Key Bridge, and fails to give proper weight to the major visual impacts along the CCT and C&O Canal towpath. Consequently, the overall conclusion that the proposed boathouse would only result in moderate visual impacts is dubious.

Based on the photo simulations presented beginning on page IV-23 of the EA, it would be hard for a reasonable observer to deny that the proposed boathouse would become a dominant feature of the D.C. shoreline as seen from the George Washington Parkway and Key Bridge. The EA, however, downplays this glaring fact by focusing on other parts of the viewshed (uphill, to the Georgetown campus, and across river to the Rosslyn skyline). The closest the EA comes to directly addressing the issue is to say that for pedestrians walking towards DC on the Key Bridge, the boathouse would be a part of a “changing visual environment.” This downplaying results in an EA that unreasonably underestimates the visual impacts of the boathouse from points down- and cross-river.

First, the proposed the proposed boathouse would result in substantial impacts to shoreline views because the existing shoreline north of the aqueduct is almost entirely forested. The only exception is the WCC property, which occupies a relatively small portion of the waterfront. The proposed boathouse, on the other hand, would span a length of shoreline almost the length of a football field, and along with its 75-foot long dock, would result in a continuous expanse of developed, rather than natural shoreline above Key Bridge.

Second, the EA improperly glosses over visual impacts to shoreline views by simply saying that the proposed boathouse is “larger” than the WCC (failing to mention how much larger), and by comparing the boathouse’s scale to the Georgetown University campus buildings. As is noted in more detail in our comments on historic resources, all of the nearby buildings of similar mass and scale are a significant distance away from the shoreline and obscured by trees. This camouflaging effect becomes even more pronounced in the summer when foliage is thick, whereas the proposed boathouse would not be shielded by trees at all. In addition, the WCC is the only building within a short distance of the proposed boathouse, but it is *not* of similar mass and scale. The proposed boathouse would have a footprint four times larger, and stand 50 to 100 percent taller, than the WCC.

With regards to visual impacts from points along the CCT and C&O Canal towpath, we agree with the EA's conclusion that such impacts are "major impacts." The proposed boathouse would completely block trail users' views of the Potomac River for a stretch the length of a football field. However, we strongly disagree with the EA's apparent assumption that these visual impacts should be weighted equally with visual impacts from other viewpoints in determining the overall visual impacts of the boathouse.

Visual integrity from the CCT and towpath is unquestionably an issue of key importance to trail users. The public flocks to these trails specifically for their natural environment and views of the Potomac River. Therefore, blocking those views impinges on the public's experience in much more serious and significant ways than degraded views from a major roadway, such as the GW Parkway or Key Bridge, do. Given these disparate effects, it is only logical to give more weight to visual impacts to the CCT and towpath, which significantly negatively affect the public's experience. The EA, however, treats them equally. It states that minor visual impacts from roadways and major visual impacts from trails equals moderate overall impacts. This is simply not a fair or reasonable calculation. Because of tremendous importance of visual integrity along the CCT and towpath, major visual impacts along those trails should mean major visual impacts for the project as a whole, regardless of how visual impacts from other viewpoints are qualified.

Therefore, in light of the fact that the EA underestimates visual impacts to the GW Parkway and Key Bridge, and more importantly, that the EA grants equal weight to visual impacts that have wildly disparate effects on the public's use and enjoyment of our public lands, the Potomac Conservancy requests that the Park Service conduct a new visual impacts analysis. This analysis should take into consideration all of the issues raised above, and should be conducted as part of a full EIS.

F. The Environmental Assessment underestimates water quality impacts, impermissibly disregards hydrologic impacts, and altogether fails to study potential flood- and construction-related impacts to the canal embankment.

The Environmental Assessment underestimates water quality impacts, impermissibly disregards hydrologic impacts, and altogether fails to study potential flood-related impacts. First, the EA characterizes increased runoff from impervious surface coverage as having "minimal" impacts. There is no support for this conclusion in the document, and experience suggests that it is not true. For example, in Maryland, impervious surface coverage on all land near tidal waters is limited to 15 percent of any given parcel in order to adequately mitigate water quality impacts associated with runoff. The preferred boathouse alternative, in comparison, would result in almost triple that amount of impervious surface coverage—42 percent. In other words, if this same project were proposed in Maryland and not DC, there would be an automatic presumption of major water quality impacts as a result of the high impervious surface coverage. This strongly suggests that the EA's unsupported "minimal impacts" conclusion is incorrect,

and that actual impervious surface-related water quality impacts would be much more significant than the EA presumes.

Second, the EA's conclusion that there are no hydrologic impacts impermissibly disregards the fact that data contained in the EA itself shows a massive increase in water flow velocity. Table 3 in Appendix P shows a flow velocity increase of 40-100 percent at the location of the new boathouse. However, the text in Chapter 4 only discusses the "slight" velocity increases that would occur further downstream. Based on this, the EA concludes that there would be no hydrologic impacts, despite the radically contradictory data contained in Appendix P. The EA's blatant disregard for data that clearly shows hydrologic impacts is simply unacceptable.

Third and finally, both flooding and boathouse construction pose a serious threat to the canal embankment, but the EA fails to study either issue. While the EA considers potential flood damage to the boathouse itself, it does not consider potential flood damage to the canal embankment resulting from increased water flow around the boathouse. Nor does the EA discuss the potential for construction-related impacts to the canal embankment. The canal embankment should have been the first item to be carefully studied because destruction of the canal embankment by construction vehicle traffic on the CCT or on site is a reasonably foreseeable and potentially disastrous consequence of boathouse construction.

Therefore, the Potomac Conservancy requests that the Park Service remedy these deficiencies by performing a full-scale EIS. The EIS should thoroughly and scientifically examines impacts related to impervious surfaces, increased water flow velocity, and increased flooding and construction-related damage to the canal embankment.

Conclusion

If you have any questions regarding the Potomac Conservancy's comments, or would like to discuss them in person, please do not hesitate to contact us. We look forward to the Park Service's response to these comments, and request once again that any such response include a full Environmental Impact Statement.

Sincerely,

Matthew Logan
President