

June 15, 2006

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

Re: Georgetown University Boathouse Environmental Assessment: Option D, “No Build” Alternative

Dear Mr. Brandt:

I am writing on behalf of American Hiking Society to express our concerns regarding the Georgetown University (GU) boathouse proposal and related Potomac riverfront issues as they affect nationally significant cultural, recreational, and natural resources. Although the cursory Environmental Assessment finds no significant impact, we support Option D, the “No Build” Alternative and strongly urge the National Park Service (NPS) to conduct a full Environmental Impact Statement (EIS) given the important historic and natural elements of the proposed location in addition to the lack of adequate discussion of alternative locations.

As the national voice for America’s hikers, American Hiking promotes and protects foot trails and the hiking experience including the conservation of existing recreational areas such as those affected by the boathouse. American Hiking Society joins 21 other national, regional, and local organizations in the Defenders of Potomac River Parkland, among thousands of park proponents and recreationists, in opposing the boathouse proposal as currently planned.

We strongly urge the National Park Service to prepare a comprehensive Environmental Impact Statement that includes analyses of impacts for several related proposals regarding the Georgetown Waterfront, including the proposed boathouse. The EIS should fully evaluate the impact of the land swap and boathouse on natural and cultural resources, hikers, other recreationists and local communities, and consider alternative locations or other types of public/private boathouses outside of the Park as outlined by the Defenders of Potomac River Parkland.

The current GU proposal to build a massive boathouse along the Potomac River within the C&O Canal National Historical Park, the Georgetown Historic District and the Potomac Gorge area has the potential to negatively impact important qualities of the riverfront. Development of this tract would disrupt wetlands and a flood plain along the river and obstruct scenic views along the Capital Crescent Trail and C&O Canal Towpath—two very popular trails in the Washington, DC metropolitan area. Impacts to the Capital Crescent Trail from boathouse construction as well as operations would

disrupt trail use and the surrounding environment and lead to congestion and safety concerns.

The original assessment was incomplete in that there was no reference to the Act establishing the C&O Canal NHP, which has restrictions on land swaps; no mention as to the purpose of the park or its development plan; and, no detailed analysis of degradation of park resources under the NPS preferred alternative. Additionally, the acknowledged visual impacts require an EIS by DO-12: Conservation Planning, Environmental Impact Analysis, and Decision-making.

The Potomac River maintains its relatively clean and wild character because of the lack of development from Key Bridge to Cumberland, MD. The proposed boathouse development could increase pollution and runoff and alter natural systems that keep the river healthy. Furthermore, the C&O Canal Towpath is the backbone of the congressionally-designated Potomac Heritage National Scenic Trail, established in 1983 to commemorate the mix of history, culture, and recreation along the Potomac River. The proposal would alter the trail experience for users of this resource representing one of twenty-four national scenic and historic trails.

We urge the NPS to protect the integrity of this nationally significant riparian and trail corridor for future generations. Thank you for your consideration of this urgent matter.

Sincerely,

Celina Montorfano
Vice President for Programs