

From: Sally C. Strain  
To: fran\_mainella@nps.gov  
Sent: Thursday, September 01, 2005 10:01 PM  
Subject: Georgetown University boathouse proposal in C&O Canal National Historical Park

Dear Ms. Mainella:

On behalf of Defenders of Potomac River Parkland, I am writing to express our concern about several matters related to the Georgetown University (GU) boathouse proposal. The Defenders is an alliance of 15 conservation, recreation and civic organizations, and private citizens, who have been working together for more than two years in an effort to protect the C&O Canal National Historical Park (Park) and Potomac Gorge from private development.

### **I. The Defenders believe that:**

- A. Private development in the Park is not in the public interest.
- B. The 1980s concept plan for the non-motorized boathouse zone, between 34th St. and a loosely-defined point inside the Park, is outdated.
- C. A better boathouse plan is possible outside the Park -- on more accessible, already degraded land -- with many safety, environmental, technical, practical and financial advantages over the current plan.
- D. Alternative locations, sizes and uses for any boathouse proposed for the Georgetown waterfront should be considered as part of an updated, comprehensive plan for the 21st century. To reach that goal, NPS should do an EIS on the entire waterfront area.
- E. One of many alternative plans worth considering for the Georgetown waterfront is a Georgetown "universal" boathouse, located at 34th St., open to collegiate, high school and public programs, and co-financed by university and public funding (instead of two enormous private collegiate facilities and one public boathouse, as currently planned, in a constricted area).

### **II. The Defenders are concerned about recent boathouse-related matters and request your clarification of the following:**

- A. DC Council Roundtable on the GU Boathouse, June 22 - Committee on Public Works and the Environment, Carol Schwartz, Chair

During the Roundtable, Chairman Schwartz asked NPS-John Parsons why the boathouse site in the Park was increased from a 4,000 sq ft (public) site in the 1980s boathouse plan to a 20,000 sq ft (private) site in recent years, to which Mr. Parsons responded that the original plan was "naive" and "a very flawed study" and "mistakes were made."

The Defenders agree with Mr. Parsons' statement, and therefore we remain puzzled as to why NPS continues to support a flawed study. Will you please clarify the NPS intent?

At the conclusion of the hearing, Chairman Schwartz pointed out to Mr. Parsons that many witnesses had requested an EIS for the GU boathouse/Georgetown waterfront. She asked Mr. Parsons to respond to that question, to which he replied that NPS has made a decision nationally that the threshold for an EIS is when a plan "encompasses the entire park." Chairman Schwartz then asked for examples, and policies for when NPS does an EA and when it does an EIS, and Mr. Parsons agreed to submit them for the record. His submission (attached) addresses only NPS policy for preparing an EIS for "general management plans." It does not include any NPS policy for preparing an EIS on other types of proposals, such as the GU boathouse being discussed during the hearing.

Our understanding is that NPS policy, outlined in DO-12 under "Criteria," reflects NEPA language: "An EIS is prepared when a proposed action has the potential for significant impact on the natural or human environment or significant public controversy."

Will you please clarify NPS policy for whether to do an EA or an EIS for projects, and will NPS now prepare an EIS only when an entire park or a general management plan is involved, as Mr. Parsons implied? If so, does this satisfy NEPA requirements?

B. Arlington County boathouse proposal

Is it true that NPS decided this year to downgrade the EIS for the proposed Arlington County boathouse to an EA -- after announcing that an EIS would be prepared, receiving public comments on the scope of an EIS, and leading the public to believe they would receive an EIS for more than a year before downgrading it? If so, will you please clarify NPS's reasons?

C. Alternative locations

We are aware that for the boathouse proposed for Arlington County, Virginia, NPS has considered and evaluated as many as five alternative locations, while for the proposed GU boathouse in the District of Columbia, NPS has not identified or considered any alternative locations (except for an "unbuildable" site upstream) -- despite several alternative locations proposed by the public at the January scoping meeting. Will alternative locations, sites and uses outside the Park, on degraded more accessible land, be considered for a GU boathouse? If so, by what process will they be identified?

D. EIS for Canal Rd. entrance to GU campus

We are disappointed that NPS prepared an EIS for the entrance to the GU campus on Canal Rd., while across the street NPS is doing only an EA for the proposed GU boathouse. Do you believe the "impacts on the natural or human environment" are significantly less on the riverbank than on the hillside above the riverbank?

We will appreciate your prompt response to our concerns, so that we can take your reply into account when we review the draft EA for the GU boathouse. We believe NPS now faces a crucial choice: whether to set a precedent of allowing a private interest to develop an exclusive facility in the C&O Canal National Historical Park and Potomac Gorge -- a national, regional and local treasure -- or to preserve and protect the unique natural setting for the enjoyment of everyone, for today and for future generations. The Defenders believe the choice is clear!

Sincerely,

Sally Strain, DC Coordinator and Member  
Defenders of Potomac River Parkland [www.savethecanal.org](http://www.savethecanal.org) \*  
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Washington, DC 20016

cc. Honorable Gale Norton  
Honorable Eleanor Holmes Norton  
Honorable Anthony Williams  
Honorable Carol Schwartz

\* Defenders of Potomac River Parkland - American Canoe Association, American Hiking Society, American Whitewater Association, Audubon Naturalist Society, Canoe Cruisers Association, Citizens Committee to Save Laurel Lakes, C&O Canal Association, Coalition for the Capital Crescent Trail, Friends of the Earth, League of Women Voters of DC, National Parks Conservation Association, Potomac Conservancy, Potomac Pedalers Touring Club, Sierra Club, DC Chapter, Washington Canoe Club