AUDUBON NATURALIST SOCIETY
OF THE CENTRAL ATLANTIC STATES, INC.

CONSERVING OUR REGION'S NATURE SINCE 1897

DCRA BOARD OF ZONING
2003 MAY 23 PM 2:40

Commission Chair Carol J. Mitten
Zoning Commission for the District of Columbia
441 4th St., NW, Suite 210
Washington, DC 2001

May 23, 2003

Re. Case #02-31

Dear Ms. Mitten:

The Audubon Naturalist Society respectfully requests that the text amendments in Case #02-31 be denied by the Commission.

In our view, the Georgetown University proposal for a 33,000 square foot private boathouse within the C&O Canal National Historical Park would have negative impacts on the natural and cultural integrity of the park. Under the 2001 National Park Services Management Policies, there is clear language on evaluating whether or not an activity or proposal would result in an "Impairment." The document states "In making a determination of whether there would be an impairment, a National Park Service decision- maker must use his or her professional judgment. The decision- maker must consider any environmental assessments or environmental impact statements required by the National Environmental Policy Act of 1969 (NEPA); relevant scientific studies, and other sources of information; and public comments."

Apparently there has only been an EA on the land swap and not the proposed use of the parcel in question. This is totally inadequate and we express dismay that the National Park Service would advance this rezoning. without adequate review.

No text amendments should be considered in this case, especially #3, pertaining to "matter of right use." Further, W-1 should not be considerred for the proposed boathouse.

The Audubon Naturalist Society and its membership places great value on the preservation of one of the finest linear parks in the nation, the C & O Canal. This rezoning is ill advised and we urge you not to support it.

Sincerely,

ZONING COMMISSION
District of Columbia
Case 02-31
Exhibit 109

Dolores Milmoe
Conservation Advocate

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ZONING COMMISSION
District of Columbia
CASE NO.02-31
EXHIBIT NO.109