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

Re: Georgetown University Boathouse Environmental Assessment

Dear Mr. Brandt:

The purpose of this letter is to offer a few comments on the Environmental Assessment (EA) on the Georgetown University boathouse proposal. I also wish to take this opportunity to offer a few thoughts on how we could achieve a sensible resolution to this matter.

Everyone I know would like to see Georgetown University acquire an environmentally compatible site on the Potomac River for its boathouse. Having said that, however, they would also like to preserve and protect the C&O Canal National Historical Park from unwarranted private intrusion and create a beautiful and interesting urban park on the Georgetown waterfront. Although the National Park Service treats the C&O Canal Park and the proposed Georgetown Waterfront Park as two distinct and unrelated entities, the two are inexorably intertwined.

With the release of the long-awaited Environmental Assessment (EA) by the Park Service, it once again advances the proposition that Georgetown University should be allowed to construct a boathouse for its private use in the C&O Canal National Historical Park. Although the public was assured that alternative sites would be considered, the EA focuses only on this one site with three alternative configurations pertaining to the size and shape of the University's boathouse. This is not the first time the Park Service has proposed an ill conceived project. While almost incomprehensible, a little over 50 years ago, the National Park Service proposed turning the C&O Canal into a vehicular highway. Happily, this wrong-headed proposal was stopped in large part by the leadership of the late Justice William O. Douglas. Even more important, the EA fails to address the first and fundamental issue in this matter: how is the public interest served by the National Park Service entering into an agreement with Georgetown University by which the University will be allowed to construct a private boathouse within the C&O Canal National Historical Park. This current project is not in the public interest and should be rejected.

To reiterate, I support a boathouse for Georgetown University on the Potomac River, but not at the location proposed by the Park Service within the C&O Canal National Historical Park near the entrance to the Capital Crescent Trail. "The subject site is 1.09 acres. It is approximately 490' long in the east-west direction, with a depth varying between 94' and 127' in the north-south

direction.” EA, II-6. But see EA, III-31, which states that the “project site is approximately 440 ft. long.” Which is it? Parenthetically, although the Park Service knows the dimensions of Georgetown University’s upstream property, those dimensions are not disclosed in the EA, the reasons for which I will discuss in a separate letter.

Any structure, and especially a private collegiate boathouse at this site within the C&O Canal Park, would necessitate the removal of trees and other vegetation. It would have an adverse environmental impact and restrict the public’s use and enjoyment of this treasured area. Indeed, a boathouse at this location would do violence to the historic and scenic features of the C&O Canal. It would only be accessible over the Capital Crescent Trail which is used by bikers and hikers every day of the year. With a gross footprint of 18,682 sq. ft., a length of 280 ft., a width of 81.5 ft. and a height of 36.5 ft., totaling 33,771 sq. ft in space, this colossus of a boathouse would be crammed into a relatively small area and would dwarf its immediate downstream neighbor, the historic Washington Canoe Club. At over three stories high, it would also loom over the C&O Canal blocking visual access to the river from the towpath. The proposed dock for this boathouse, jutting some 75 feet into the river for a length of 250 ft. along the shoreline, would impinge on the traditional training and race course area used by the Canoe Club for over 100 years.

On May 25, 2006, I met with two WASA engineers to discuss the Georgetown University boathouse proposal. While they stated that from an engineering point of view this boathouse could be constructed over the Upper Potomac Interceptor Sewer line which runs under the proposed site, they nevertheless conceded that it would be better to avoid construction of such a structure on top of this large sewer line. Their conclusion reflects the position of an earlier study cited in the EA at IV-5. Although we were told at the scoping session that all alternative sites would be considered, WASA was only asked to comment on construction of a boathouse on this one site in the C&O Canal Park. The construction of Georgetown University’s boathouse at an alternative location might very well result in avoiding the engineering problems inherent in the proposed site.

The proposed location of this boathouse also poses the potential for a hydrological disaster when the next large flood occurs, as surely it will sometime in the future. Powerful currents moving downstream in a flood will be channeled and squeezed between the proposed boathouse 280 ft. in length -- almost the length of a football field -- and the C&O Canal embankment. When this happens, the force of the water is magnified and the damage to the embankment resulting therefrom would be more severe than if the flood waters flowed over a wider and wooded area. In fact, this magnified rush of water would probably rip the embankment apart. According to Appendix P, Table 3 of the EA, the velocity of the river flow in feet per second would increase between 40 percent and 100 percent as the water passes between the proposed boathouse 280 ft in length and the C&O Canal embankment. Thus, although not specifically revealed in the EA, Appendix P supports the probability of severe damage to the embankment if this boathouse is built when the next serious flood occurs. Parenthetically, during my meeting with the WASA engineers, they opined that in a major flood, water would indeed accumulate behind the proposed boathouse and possibly destroy the embankment unless some sort of structure that would protect the embankment were constructed. Of course, this would block the Capital Crescent Trail. Obviously, this is not a good solution.

While clearly not an environmental concern, the Park Service contends that the proposed boathouse and its enormous size is necessary to “provide training and boat storage space for Georgetown University’s rowing program and enable the program to successfully compete in National Collegiate Athletic Association (NCAA) rowing events.” Since the University paid for and participated in the development of the EA, it’s not surprising that it would contain a gratuitous plug for its rowing program. Indeed, this arrangement between the Park Service and Georgetown University has all the ingredients of a conflict of interest.

On May 19, the C&O Canal Advisory Commission had an emergency meeting to discuss the just-released EA. Once again, the Commission reaffirmed its opposition to the proposal by the Park Service to place a private collegiate boathouse within the C&O Canal Park. The C&O Canal Association has also taken a similar position on this matter. In addition, Defenders of Potomac River Parkland, an alliance of 22 national, regional and local civic, recreational and environmental organizations, ANC3D, and the Federation of Citizen Associations of the District of Columbia have voiced their opposition to the Georgetown University boathouse proposal. It is a sad commentary on the current attitude of the National Park Service when it ignores the advice of these organizations, many of which are specifically devoted to the protection and preservation of the C&O Canal National Historical Park.

With respect to the EA, the public was told by the Park Service that “everything was on the table,” including consideration of alternative sites for Georgetown University’s boathouse, as required by the National Environmental Policy Act (NEPA). A cursory glance won’t do. NEPA mandates a hard look. Instead, rather than a meaningful exploration of alternative sites, the Park Service has stuck to the one unacceptable site within the C&O Canal Park and has engaged the University in direct negotiations pertaining to this one site. The public has been completely shut out of these discussions. Thus, the Park Service has essentially anointed Georgetown University as a co-author of the EA. This is not only improper, but it is probably illegal. Also, such direct discussions, without public participation, give credence to the belief that the University is using its muscle and political clout to achieve its goals even at the expense of the citizens of the District of Columbia. The validity of the ultimate resolution of the Georgetown University boathouse proposal must be grounded on the good faith and integrity of the National Park Service.

In order to infuse some semblance of fairness and transparency into the process, the Park Service has been asked on numerous occasions to provide a mechanism for public participation in the development of the EA, including convening a conference in which all interested parties could engage in face-to-face discussions. These requests have been ignored. I have personally attempted to have a meeting with officials of the Park Service to discuss the issues involved in the boathouse proposal. I was told that such a meeting would be inappropriate because “we’re in a NEPA process.” This restriction apparently does not apply to Georgetown University. Based upon the facts in this case, the University secured a permanent place at the table by picking up the tab for the EA. The determination of this matter, and in particular the selection of Georgetown University’s boathouse site, should not be based on private discussions between the Park Service and Georgetown University, and then the public presented with a fait accompli. Of course, this is exactly what has happened.

The non-motorized boathouse zone originally extended from 34th and Water Sts. to 1,100 ft. upriver from Key Bridge. Apparently, because it was subsequently determined that more land was needed to accommodate the enormous size of Georgetown University's proposed boathouse, an additional 150 ft. of the C&O Canal Park was essentially annexed without any legal procedure of which I am aware. As I understand it, the upstream boundary of the non-motorized boathouse zone is now described by the Park Service as somewhere between 1,100 and 1,250 ft. upriver from Key Bridge. This ambiguity as to the upriver boundary obtains because, as a representative of the Park Service testified at a hearing before the DC Council on June 22, 2005, there is no "hard line in the woods," but just a "general guideline." If the non-motorized boathouse zone can be extended willy nilly from 1,100 ft. to 1,250 west of Key Bridge, why not a similar extension east of Key Bridge.

On numerous occasions over the last year or so, I've heard officials of the Park Service state that the proposed site within the C&O Canal Park for Georgetown University's boathouse has "traditionally" and "historically" been the location for boathouses. Surely, a one-story boathouse built on piles and lasting only one year before being washed away in 1891, EA III-20, cannot make the case that the location proposed by the Park Service is either traditional or historic. Therefore, with the exception of the previously mentioned "boathouse," I was surprised that the EA fails to identify any other boathouses or any other structures relating to boating upstream and west of the Washington Canoe Club (WCC). EA, III-16 to 22. The EA at III-17 states:

According to historic maps, in 1903 there were at least six boathouses along the Georgetown waterfront: a one-story building located at 34th and Water Streets; the Georgetown College (now Georgetown University), Boathouse at 32nd and Water Streets (the former Columbia Athletic Clubhouse) and an adjacent two-story boathouse; a two-story boathouse at 31st and Water Streets; and two one-story boathouses located between the Aqueduct Bridge and 34th Street.

It should not go unobserved that in 1903, Georgetown College had a boathouse at 32nd and Water Sts., not anywhere near the vicinity of the site now proposed by the Park Service. So much for tradition and history. In subsequent maps, the Potomac Boat Club (PBC) and the WCC are identified. Again, however, no boathouses are identified upstream and west of the WCC. Thus, the EA actually shows that boathouses were "traditionally" and "historically" located at and east of 34th and Water Sts., the location which I have recommended for Georgetown University's boathouse. Also, a boathouse at this location would have no impact on the Old Georgetown Historic District.

The only justification by the Park Service for the boundaries of the non-motorized boathouse zone is based simply on the fact that these boundaries were established in the 1987 Plan for the Georgetown Waterfront Park and the C&O Canal National Historical Park. EA, II-24. This position begs the issue. Nearly 20 years old, this plan is outdated and fails to address the changing needs of the public in 2006. These arbitrarily drawn boundaries fail to recognize the ever expanding public interest in water-related activities as evidenced by the growing number of rowing programs. Indeed, this restrictive boathouse zone is strangling the expansion of the recreational use of the river. What is needed now is a plan with a clear vision for the future which accommodates current realities.

The argument that construction of Georgetown University's boathouse in the C&O Canal Park will free up needed space in the Thompson Boat Center is a red herring. The stumbling block is the proposed location of the boathouse within the C&O Canal Park, not the boathouse itself. Had the Park Service over the years argued for a site environmentally compatible and harmonious with sound urban land use planning principles, Georgetown University might very well have had its boathouse a long time ago. The obstinate insistence by the Park Service to cram this enormous private collegiate boathouse within the C&O Canal Park at the entrance to the Capital Crescent Trail is the problem. GW, which also occupies space at Thompson's, has been promised a site for its boathouse immediately upstream from 34th St. This site poses few, if any environmental issues. That being the case, if Georgetown University's boathouse were located at the site immediately downstream and adjacent to GW's site, the University would have smooth sailing for approval. While not widely known to the public, the Park Service has had a policy precluding GW from proceeding toward the realization of its own boathouse until Georgetown University's boathouse situation is completely resolved even though GW already owns two riverfront townhouses which it plans to exchange for its site at 34th St. This policy makes no sense. Moreover, it is unfair and unreasonable. And since GW's boathouse site is subject to an EA, then its site should have been reviewed and considered along with the EA pertaining to Georgetown University's boathouse. See EA, I-9, IV-63. To recapitulate, had the Park Service made more appropriate and sensible land-use planning choices over the years, both Georgetown and GW would be in their own boathouses today thereby leaving Thompson to the high school rowers.

In terms of land use planning, the entire waterfront from Washington Harbour to the Washington Canoe Club should be treated as one integrated and comprehensive area. This would avoid piecemeal planning and reinforce the relationship between the nascent Georgetown Waterfront Park and the C&O Canal National Historical Park. It would also allow for a review and needed modification of the 1987 boundaries which are no longer relevant. Hence, contrary to the contention made in the EA at II-24, the argument that the Georgetown Waterfront Park Plan cannot be modified is without merit if changes are required by current realities. In order to protect the integrity of the C&O Canal Park, the proposed site for Georgetown University's boathouse in the Park should be eliminated. For the reasons mentioned above, this particular site for a boathouse is an obvious mistake. For these reasons, I support the need for an Environmental Impact Statement covering the entire waterfront from Washington Harbour to the Washington Canoe Club.

While some would prefer an entirely passive park of trees, grass, walkways and benches, there is no good reason for this type of park to consume the entire 10 acres of the proposed Georgetown Waterfront Park. The boundary separating the Georgetown Waterfront Park from the non-motorized boathouse zone should be redrawn to reflect the changing needs of the public. Since the Georgetown Waterfront Park is approximately 10 acres, locating Georgetown University's boathouse on a site at the far western edge of the Park adjacent to George Washington University's designated site just upstream from 34th St. would only amount to a slight encroachment of less than an acre in a portion of the Park now planned as a buffer of grass and trees. Most of the currently approved design for the Park would remain in place.

Georgetown University's boathouse at this alternative site would not restrict views to the Georgetown Waterfront Park and the river along street corridors perpendicular to Water St. The University and GW could share access roads and docks, thereby reducing the environmental impact on this area. This site, already environmentally degraded and covered with asphalt, is also deeper and more readily accessible than the originally proposed site. Since the Park Service has no problem with GW's boathouse site because of the alleged "elevation . . . above the river," issue, locating Georgetown University's boathouse at a site immediately adjacent to GW's should not present any problems. EA, II-24. In any event, the "elevation . . . above the river" problem has an engineering solution. Of course, Georgetown University would bear the cost of site preparation, bulkhead renovation and new construction in this portion of the Park, thereby shifting some of the considerable expenses away from the Park Service and the National Park Foundation. Of critical importance to many, the Park Service has the leverage to insist that the boathouse be well designed and of an appropriate size. With the ever expanding public interest in water-related activities, a boathouse at this location would be a contemporary reminder of the early history of Georgetown as a port. These two elegantly designed collegiate boathouses, side by side, would anchor the western end of the Park and could be an architectural tour de force.

The claim that it is too late to achieve a sensible resolution is without merit. The Park Service is still in control of the Georgetown University boathouse proposal as well as the proposed Georgetown Waterfront Park, which is still being planned, albeit in an advanced stage. However, no work has commenced. If an environmental and land use planning mistake has been made, it is better to correct it now than to regret the consequences in the future when corrections may be impossible.

While I had hoped that those responsible for this EA would have seriously considered other alternative locations for Georgetown University's boathouse, I have nevertheless offered in this letter what I believe to be a sensible and responsible resolution of this matter. Notwithstanding my best efforts in this regard, because of the current attitude within the Park Service, I am constrained to recommend in these circumstances the "No Action" alternative since I feel strongly that alternatives A, B, or C would do significant environmental harm to the C&O Canal National Historical Park.

Respectfully submitted,

Robert B. Norris