



Washington Canoe Club

3700 WATER STREET, NW
WASHINGTON, D.C. 20007

June 15, 2006

Dear Kevin,

On behalf of the Washington Canoe Club, I would like to submit the following comments.

WCC endorses OPTION D, No Build. Further, we request that should the National Park Service decide to proceed with construction, an Environmental Impact Study of the entire waterfront park be performed prior to such construction. If an EIS is performed, due to the extent of the flaws and significant omissions in the Environmental Assessment, we believe the EIS should be directed by an organization other than the NPS, such as the Environmental Protection Agency.

For terms of reference, please find the below attached letter that was submitted by the Washington Canoe Club during the Scoping Session. It was delivered to NPS by email:

----- Original Message -----

From: "Larry Schuette" <Lawrence.Schuette@verizon.net>

To: <NCR_Georgetownboathouse@nps.gov>

Sent: Friday, January 21, 2005 12:15 AM

Subject: Comments for the GU Boathouse Scoping

> Hi,
>
> Please find attached the WCC comments for the Scoping.
>
> v/r
> Larry

It is distressing that the issues about which WCC was concerned and brought to the table at the Scoping Hearing appear to have been largely ignored and unaddressed in the EA. WCC is extremely concerned about the structural viability of the Canal Embankment (see attached). The undercutting of the fragile canal embankment during a flood could lead to the catastrophic loss of the WCC structure. The EA makes no attempt at analyzing the Canal embankment and the impact of heavy construction equipment, or the construction of a massive structure next to it. This is quite alarming. It would seem that analysis of the impact on the long-term viability of the Canal Embankment would be NPS's highest priority. Second would be the scenic view shed and impact of the massive structure on it. While the EA admits the GU boathouse would be "larger," it does not attempt to quantify by how much. From a WCC perspective, the impact on the WCC structure and programs should be the third consideration. At the bottom of the list should be what Georgetown University "wants."

Unfortunately this EA appears to be predicated on the highly suspect assumptions that :1) the NPS should be promoting Georgetown University rowing at the expense of the public interest and the existing programs of WCC, 2) GU has no room on campus for rowing, 3) GU should be allowed a building that is as massive as GU

wants, regardless of how far in excess of it's actual needs it is, and finally 4) if GU isn't allowed to build as much as it demands on the downstream location, it will build on the upstream location.

This EA appears to begin as an endorsement of the Georgetown University rowing program, as if promoting GU's desires to compete in the NCAA's was a NPS policy directive. This does not make any sense. Many collegiate programs compete at higher levels of performance with less than GU currently has at Thompson's. There is little to no objective comparative analysis to balance GU's desires. In addition, none of the programs mentioned in the EA are sited in a Historic National Park. WCC has previously submitted an analysis of the various boathouse sizes of GU's competitors. We documented and concluded that despite GU's claims to the contrary, the proposed boathouse will in no way be "average." In fact, if built, this will be one of the largest rowing facilities in the United States.

WCC is very concerned about the threatened elimination of its outdoor storage and the fence. Our outrigger canoes are over 40 feet long, 7 feet wide and weigh over 400 lbs. Neither these nor our war canoes will fit inside the Canoe Club. Nor will our motor launches. The loss of our fence will devastate the oldest flatwater club in the country, a club internationally regarded as the birthplace of the Olympic sport. Our active training and racing program will be severely affected. It should be noted that Mr. John Parsons and Ms. Sally Blumenthal spoke in December 2002 about not only keeping the fence but also expanding our property downstream to compensate us for the land lost to GU. It would appear that they have changed their minds. Both Thompson's and PBC fence public land for outdoor boat storage. Why is WCC being singled out? Removing the fence will open WCC up to the criminal element. Vandalism, including arson is not uncommon in the area. Even with our fence, our one hundred and two year old structure has been broken into on several occasions in recent years. In one incident, a canoe hanging from our ceiling, one that was used to win a gold medal in the 1952 Olympics, was smashed. Removing the fence will make the vulnerable, and difficult to secure WCC facility, which is on the National Historic Registry, wide open to damage.

US Canoe and Kayak racing is a small sport in which WCC plays a critical role. We host 6-10 regattas each year with participants regularly coming from as far as Canada and Georgia. In order to host these events, we depend on having ample fenced area for guests' trailer and boat storage, as well as a safe race course that can adequately be managed from our clubhouse. Removal of the fence would limit our ability to continue to host regattas.

As has been stated many times before, WCC is also concerned about the effect of the permanent pier and 240 foot docks that will extend 75 feet into the river and intrude upon our traditional race course and training area, as defined by the Potomac Safety Committee. Despite the EA's dismissal of the issue, the placement of this boathouse and the nature of fast, backward-traveling rowing shells as opposed to slower, forward-traveling canoes and kayaks, will create long term, ongoing conflicts that may not have mutually agreeable solutions.

That GU doesn't want to allocate space on their campus to rowing should not be a concern of the NPS, and certainly shouldn't be a rationale for allowing a massive boathouse in the Park. There appears to be constant new construction occurring on GU's campus, and with over 140,000 SF of space at Yates Field house, there must be some room for the rowing program. GU's space allocations for its various sports and educational objectives should in no way justify excessive intrusion onto US Park land.

During the scoping hearing, ample information was provided on various rowing programs. Many are split programs and many don't have rowing tanks, particularly the Universities in warmer climates such as Washington DC. With GU storing 20 "8"s at Thompson's, yet only using 2000 Square Feet, a balance between public good (getting GU out of Thompson's) and private benefit (having their own boathouse) would seem to tip the scale towards the 4,000 SF Boathouse that was approved in the 1987 plan. Many of the problems with the boathouse are caused by its excessive size. These include: additional construction traffic, additional bulk,

additional visual blockage, additional concern of what the piles will do, the need to span the sewer line, the decreased distance behind the boathouse and in front of it (which then requires a pier).

Finally, neither GU nor NPS has shown that construction is viable on the upstream site. Given that the threat of GU building there was the main justification provided by the NPS for over 15 years, it would seem that the NPS could and should dramatically restrict what GU ultimately builds, no matter where they do so.

We ask again questions that are unanswered in this EA: “What damage will the construction traffic do to WCC? What damage will it do to the Canal? What will the piles do to the underground water flow? Where will the water go? What will that do to WCC? How much damage will the increased water velocity behind the new building do to the Canal embankment?”¹ It should be noted that WCC NEVER received a copy of this study when it was performed three years ago. That this EA considers none of these obvious questions in any meaningful manner (or in the case of the hydrology during flood it ignores it) is sufficient to cause it to be converted to an EIS on the waterfront.

Further, WCC was not a consulting party during the Historic Review 106 that was performed in the 1990s. Nor were we consulted during the 106 process performed for this EA. We strenuously object to the manner in which the 106 process was handled during this EA. The 106 process should not be used to raise the size of the building, but to rather dramatically lower it.

In conclusion, WCC recognizes the extensive pressure that GU has placed upon the C&O Canal NHP. We can only hope that the pressure doesn't result in a “Dan Snyder Affair” where hardworking C&O Canal NHP employees are made scapegoats. Clearly an EIS is required. The EIS should examine the entire waterfront park and include objective analysis of what is best for the Canal Park, and the public.

/s/

Andrew Soles
President, Washington Canoe Club
PO BOX 25449
Washington, DC 20007

¹ Ernie Brooks, GU Boathouse Open House “The two issues I came seeking clarification on resulted in what I can only describe as near bombshell magnitude explanations. I approached Richard Dorrier (EDAW chief spokesman for this meeting) immediately following the opening comments. I asked him how they could have concluded, "that there is no significant change to flow characteristics studied as a result of the construction of the boathouse", when Table 3, located on the same page as that conclusion, shows the flow velocities during floods increasing from 40%-100% along the canal embankment in the area opposite the new building. When he couldn't explain that obvious inconsistency, he introduced me to John Clappsapple, who was the EDAW employee responsible for the Hydrological Study/Hydraulic Analysis section of the EA. John was very straightforward, but, like anyone caught making such an error, he initially tried a little hand-waving, but soon gave up on that approach. It was then that he acknowledged that the study that appears in the EA, which was supposed to look at the environmental effects of the proposed boathouse throughout that area, was actually a report they had previously done to address concerns of the WCC about the effects the new building would have on the WCC building. ***They hadn't bothered to rewrite the conclusions for the broader view of the EA, but had simply handed in the results for the more limited scope of only what was happening hydraulically once you get to the Canoe Club.*** After 3 years of dealing with all the revelations of deceit, trickery, and just plain shoddy work connected with this project, I thought I was immune to being surprised, but I have to tell you I was in shock. We had asked over and over again for an EA, we finally get one, and one of the most important environmental aspects of the proposed boathouse warrants no more than a photocopy of an earlier, much narrower study. How can we trust that other aspects weren't dealt with in such a cavalier fashion?”



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Dear Sirs:

Please include this in the public record for the Scoping of the Environmental Assessment for the proposed GU Boathouse. The Washington Canoe Club welcomes the opportunity to comment and appreciated the Scoping Session held by the National Park Service on January 11th, 2005. The Scoping Session provided an excellent format for discussing and airing issues and alternatives.

Others have well articulated the issues of the Boathouse. If these are redundant, allow us to add to their weight. If they are unique, please include them. WCC is on the National Historic Registry and will most certainly be impacted in a severe and significant fashion by the proposed Boathouse.

In summary the primary problems with the proposed boathouse on Tract 102-114 are tied to the substantial size and height of the boathouse. Proposing the largest boathouse on the East Coast on a fragile, narrow piece of the C&O Canal NHP is a very tough "sell".

Two historic structures, the C&O Canal and Washington Canoe Club are at risk from the construction and operation of the GU Boathouse. It is appropriate that the impacts on both be carefully examined as part of the EA in addition to the impacts on the Potomac River. Please consider the following when Scoping the Environmental Assessment:

- 1) Based on the Scoping Hearing of January 11th, it's clear that an EIS is required. The controversy surrounding the project can no longer be denied. An EIS is appropriate by law and is indeed worth performing.
- 2) Our understanding from communication with the DC SHPO is that the Historic Review 106 process is not going to be re-opened under this EA. That is a mistake. A 15,000 square foot structure rising 40 feet above ground is historically incorrect for the setting regardless of the protests from GU or some within NPS. A 15,000 square foot structure is three times the size of WCC and would dwarf WCC. It also causes view shed and scenic view issues for the other Historic structure: The C&O Canal. This visual inconsistency will be objectionable, as evidenced by the public outcry. Opening the 106 process to include a new MOA is the only way to ensure any new construction is properly assessed.
- 3) What are the issues during construction? All these issues should be subcontracted to the appropriate licensed engineering firms. GU proposed using Auger screw piles. This shows they are aware of the sensitive nature of the location. How sensitive is it? While a geotechnical report was likely done on the actual building location, none was done on the Canal embankment. A complete Geo technical survey needs to be done on the location and on the Canal Embankment for the length of the building and access road. The stability of the embankment needs to be examined in the context of the proposed construction. What damage will the truck traffic do to WCC? How can this be mitigated to the point that no damage occurs? What damage will truck traffic do to the Canal? (Scenes of Southern California hillside slidings come to mind). Perhaps barges can be used to haul materials (as NPS has done in the past) to eliminate truck traffic. What damage will the hundreds of concrete pilings do to the water table? What impact will they have on WCC? What impact will the building have on the water that flows from the Canal embankment? What will that do to WCC? How can it be eliminated?
- 4) What are the issues during operation? Documentation from the 1980s shows a much smaller boathouse on the site. A smaller boathouse would have much less impact on WCC or the Canal.

a) Allowing in the boathouse only that which benefits the public by locating it on the banks of the Potomac River would make for a much smaller boathouse. What public benefits are derived from the proposed boathouse? What is the minimum size boathouse that provides these public benefits? What impact would that (much smaller) boathouse have on the Canal? On WCC?

b) How can a boathouse be designed which doesn't require a permanent pier in the river? The permanent pier was included to allow the removal of shells in the winter when the ramps were removed. Placing the boat bays parallel to the river would make eliminating the pier possible. What dock designs can be used that eliminate the additional extra length into the river? This past winter the river froze and the ice built up. The release of the ice occurred in a matter of minutes. What impact will this new structure (and / or pier) have on WCC during these conditions? What impact will the pier have on the river during normal river flow? Will it increase sedimentation deposit downstream, thus rendering WCC docks unusable because of silting? Will the massive docks proposed have an impact on the river sedimentation, again causing silting which makes the WCC docks unusable. What impact will the docks have on the WCC racecourse? What impact will the docks and increased rowing traffic on that portion of the river have on the significant recreational kayaking and canoeing community that uses Jacks Boathouse and WCC? Canoeers and Kayakers are told (by the Potomac River Safety Committee) to stay on the DC shoreline - right where the proposed boathouse will be built and place significant "8" traffic.

c) WCC is extremely concerned about the proposed boathouse causing damage to WCC or the Canal embankment during flood. These issues were raised to NPS and GU in December of 2002. WCC was assured that a local hydrological flow impact study would be performed. We ask that it be performed as part of the EA/EIS. While FEMA indicated that the river would rise no more than an additional .001" inches, what concerns WCC is the local flow conditions caused by the boathouse. WCC has survived 100 years in the floodplain. Will the building cause additional sediment build up at WCC during flood? Will the building cause scouring of the Canal embankment during flood? The comments of Paul Pollinger are included again as they highlight the issues.

1. Once the Potomac River reaches flood stage where does the water that flows into or against the up riverside of the proposed boathouse go?
2. For the water flowing against and around the walls of the proposed Georgetown boathouse, again once the Potomac River reaches flood stage, how much water enters the building under the proposed design guidelines?
3. How much water flows downstream over the Crescent Trail when the flood stage is one foot, then three foot, then seven foot, then eleven foot, and then a maximum flood level at the proposed boat house site now and how much water will flow there when the boathouse is build.
4. For the waters of the flooded Potomac River that might be entering the space to the downstream left flow around the proposed boathouse, is it possible for any of that water to flow over the proposed access road and Crescent Trail and touch the dirt foundation of the C & O canal?
5. If water does flow downstream to the left of the proposed boat house as a result of hitting the proposed boat house at the various flood stage levels mentioned above, how much water is touching the foundation of the of the C & O?
6. If water is flowing off of the upstream walls of the proposed boathouse, those walls being more or less perpendicular to the flow, is there any turbulence or eddy currents induced into the water flow that would be greater than what may already be there? For instance could the

swirling of downed trees act as a saw were they to hit the foundation of the C & O Canal causing that C & O Canal wall to erode faster than if the proposed boat house was built so as to not cause turbulence and eddies? Could just the swirling and turbulence of the water without debris cause erosion to the C & O Canal wall?

7. Does the placement of the proposed boathouse cause the water to accelerate in that volume on the downstream left of the boathouse between the proposed boathouse and the C & O Canal foundation? If so, could this faster moving water by now being in a channel cause the C & O Canal wall in this area or downstream to fail?

8. What would be the consequence of the failure of the subject dirt foundation and shoulder of the C & O Canal at the downstream left of the proposed boathouse or further downstream of the proposed boathouse? Could this add to or cause damage to the buildings on River Rd/K Street by having more and faster water flow by those buildings at their flood stage?

9. Considering the unusual situation where the C & O Canal north shoulder and foundation is not a traditional bank but a reinforced concrete and steel retaining wall protecting Canal Road, during flood stages could this place more pressure on the traditionally design dirt foundation and shoulder of the south wall of the C & O canal. If so, which wall might fail first if any?

10. Recent construction shows additional new drains under Canal Road into the C & O Canal. Those drains seem to be taking water from the newly paved parking lots and construction on the hillside above Canal Road? Will the proposed study take into account the additional flow of water into the C & O Canal from these sites and the associated loss of green space that used to mitigate the flow of this drainage water? Thus if flow is already increased in the C & O Canal would this impact on the possible ability of that single foundation and shoulder to hold all the water presented to that earthen side during flood periods? Does that fact that the C & O Canal, for the length of canal we are addressing, has a gentle bend in the canal make any difference on the wall that is not reinforced steel and concrete?

5) Mitigation techniques to reinforce the Canal embankment could protect the Canal embankment various failure modes. This could include injecting Soil Concrete to strengthen the embankment. However, it would seem that the best mitigation for WCC would be to move the GU boathouse downstream (at the Dempsey's site or even further) OR at the far western edge of Tract 102-114 and keep a tree buffer in between the proposed Boathouse and WCC. Making the building smaller than WCC would also reduce the impact of the building on the local flow of the river.

6) WCC, like many in the community, was shocked and dismayed by the size and height of the structure. The building blocks substantial views from the Canal. Moreover, the fact that the building proposed is twice as tall, twice as deep and twice as long as WCC ensures that most views upstream from WCC are dominated, if not blocked outright by the proposed boathouse. What is the scenic view impact of the structure? A model should be built showing the potential view shed. This should include Rosslyn, Key Bridge, the Canal, WCC, Three Sisters and Canal Road (since the structure is 13 feet above Canal Road). Various alternative boathouse models could be placed on the site and / or on alternative sites that would allow full and open discourse on what is proposed.

I believe that the proposed boathouse, no matter how beautifully designed, is of such a grand scale that it will mar the views from the Virginia shore, the Potomac River, the Crescent Trail, and from the towpath in a truly devastating manner. Clearly these are the views that the National Capital Planning Commission is trying to preserve when they state in their February 2001 revised Comprehensive Plan for the National Capital [Parks, Open Space, and Natural Features Element](#):

“View corridors should be maintained to the monumental city of Washington – such as those experienced when traveling southbound on the George Washington Memorial Parkway (GWMP) atop the Potomac Palisades, or northbound along the GWMP from Alexandria – **should be maintained and protected for the enjoyment of all** [emphasis mine].”

Additionally the NCPC states that: “The C&O Canal NHP should be preserved as a legacy of inland waterway development. It should serve as a recreational area for non-motorized uses, such as bicycling, jogging, hiking, and boating **though preservation of the park’s historic resources should take precedence over the provision of recreational activities** [emphasis mine]. Adjacent development should be kept at a low density, except east of Key Bridge.”

Further that “As a great natural area, the Potomac Palisades...should reflect the nature which controlled early settlement in the Region. **Conspicuous man-made forms** should be avoided upstream from Key Bridge [emphasis mine].”

If the Boathouse must be made conspicuous perhaps it should be moved east of the Key Bridge.

v/r

/s/

Larry Schuette
President, Washington Canoe Club
PO BOX 25449
Washington, DC 20007