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January 14, 2008

Kevin Brandt, Superintendent  
Chesapeake and Ohio Canal National Historical Park  
1850 Dual Highway, Suite 100  
Hagerstown, MD 21742

ATTN: Please make this document part of the public record of scoping for the Environmental Impact Statement for the proposed Georgetown University boathouse.

Dear Superintendent Brandt:

I am writing you on behalf of the Board of the Coalition for the Capital Crescent Trail (CCCT), our 2200 members, and many thousands of Capital Crescent Trail (CCT) users regarding our concerns over a number of issues involved with the proposed Georgetown University (GU) boathouse, and appreciate these concerns being taken into consideration in the scoping phase of the Environmental Impact Statement being prepared for that project. Let me start by saying that we feel the proposed site, immediately upstream of the Washington Canoe Club (WCC), also referred to as Tract 102-114, is *not* the most suitable site along the Georgetown waterfront for a boathouse to be used for a university rowing program due to negative environmental impacts associated with limited space, difficult access, severely increased river velocities during high flow levels in the Potomac, proximity to two very busy recreational trails, and potential conflicts and negative impacts on trail users. The Environmental Assessment (EA) on this proposal, released by your office in April 2006, confirmed the presence of these negative impacts, and should provide insights for the scope of the EIS. Beyond that, the building options set forth for consideration on Tract 102-114 in this study are inappropriate for that location. It is our belief that the EIS will confirm those opinions, and the process can move forward with a boathouse for GU that is properly sited, and fits its location.

We understand the Park Service desire to open up more recreational and competitive boating opportunities along the Potomac River, and we are aware that removal of GU's racing shells from Thompson's Boathouse will make more space available for the high school rowing community, as well as other citizen rowers. We also understand that GU currently owns a parcel of land within the C&O Canal NHP, about a mile upstream from Key Bridge, and an access easement through the CCT Right-of-Way (ROW) to that parcel, and we agree that obtaining that

parcel, and removing the access easement to it, would be a positive development for the CCT, and the C&O Canal National Historical Park (C&OCNHP), of which the DC section of the CCT is a component. However, we feel strongly that the National Capital Region Office of the National Park Service (NPS) has been willing to give up far too much to GU in exchange for the parcel and easement. We feel that a much better resolution for all involved would be a swap for recently acquired National parkland in what is called the Georgetown Waterfront Park (GWP), which is a component of Rock Creek Park. Specifically, a parcel immediately downstream from 34<sup>th</sup> Street, and adjacent to the site for a proposed George Washington University boathouse seems like a natural fit for this use. Development of a boathouse on that parcel would have few, if any, of the negative impacts that will exist with such a development on Tract 102-114. We are pleased to see that such a site is to be included in this study, and hope that you give it the same serious consideration as Tract 102-114. Another site that should be included in this EIS is the property between the Key Bridge and the Potomac Boat Club. A boathouse for a university rowing program would easily fit on that site, and also would not face the environmental challenges of Tract 102-114. Boathouses on either of these alternative sites would have the added benefit of grouping all the rowers together downstream of the Aqueduct Bridge, leaving the possible sites upstream of the Aqueduct Bridge for the paddlers (WCC & a relocated Jack's). In fact, an EIS for the entire GWP, including the Non-motorized Boating Zone, should be done to determine the best sites for boathouses to be located. If for some reason, unforeseen to us at this time, these alternate sites are determined to have too many negatives associated with them, a university boathouse could be sited on Tract 102-114, but only if it is *much smaller than what is currently being proposed*. In a nutshell, we are saying that the Park Service should not be entering into an exchange to remove a negative from the CCT (the property/easement currently owned by GU), while creating an even greater negative in so doing.

We look forward to your analysis of the issues enumerated below.

Sincerely,

Peter Gray,  
Chairman, Coalition for the Capital Crescent Trail  
[contact@cctrail.org](mailto:contact@cctrail.org)  
(202) 234-4874

## **Issues we would like to see addressed in the EIS relating to development of Tract 102-114**

- 1) Vehicular access to a boathouse on Tract 102-114 -  
Development of Tract 102-114 could negatively impact the first 0.2 miles of the CCT due to competition for space with the University's proposed vehicular access to their boathouse. Any such vehicular use could lead to less safe conditions than users have come to expect along the entire length of the Trail. A detailed report on how much, and what type of vehicular traffic is anticipated to and from the boathouse along the CCT should be prepared as part of this EIS, along with an assessment of the impacts of those

vehicles on Trail users. This report should also document and analyze effects on Trail users of a lengthy construction period, including impacts of construction vehicles accessing the site over the CCT.

2) Tunnel effect along length of boathouse –

Due to the existing 28' high canal embankment on the north side of the CCT, a boathouse structure immediately to the south of the CCT, with a length in excess of 280', and heights varying from 38'-50'8", would replace an open feel for trail users with a tunnel effect along that length. This effect could be somewhat mitigated by scaling back the width of any boathouse structures on the site to no more than 50', dividing the boat storage facilities into two 50' by 80' buildings, separated by an 80' gap for removal and turning of boats, and lowering the rooflines to the levels of the adjacent WCC building and the Canal embankment. In addition to reducing the tunnel effect, such a layout will open up river views to users of the CCT & C&OCNHP towpath.

3) General size considerations -

As jointly presented to the DC Zoning Commission by GU and the National Capital Region office of the NPS, the boathouse used almost every square inch allowed by the W-0 Zoning given to Tract 102-114, and in addition needed two Special Exceptions to the Zoning Ordinance, as well as a Zoning Variance. The footprint has since been slightly reduced, but it is still some 25% larger than what had been agreed to in an MOA in 1998. In fact, what was accepted by NPS in that MOA (a footprint of 15,000 sq. ft. and a height above the CCT not to exceed 40') is far too large for the site, and creates a greater negative impact to the CCT than what is being removed by acquiring GU's upstream parcel and access easement. It is our hope that the EIS process would use the historical WCC building, and C&O canal structure as guides in establishing proper size for a boathouse located on Tract 102-114. When commenting on the language in the proposed Land Exchange Agreement in April of 1996, the Superintendent of the C&O Canal NHP, the late Doug Faris, stated that "the height of the GU boathouse should not be and (sic) higher than the existing historic boathouse of the Washington Canoe Club" (see attachment). We would agree that the height of WCC, or that of the Towpath, should be used as limits to the height on any boathouse built in proximity to them. While the square footage of the WCC cannot be used as an exact guide for a rowing boathouse, an adjacent boathouse should not overwhelm this historic structure.

4) Exacerbation of flood impacts on the CCT and the C&O Canal embankment -

The results of the Hydrological Analysis reported in the April 2006 EA (Appendix P, Table 3, Cross Section M1) showed that developing the proposed boathouse on Tract 102-114 would double the velocity of the Potomac River against the C&O Canal embankment (from a current value of 3.5 feet/sec., to a value of 7.0 feet/sec) when the river is at a high flood stage. This is an extremely unsafe condition, and must be recognized among the negative environmental impacts associated with this site.

5) Boathouse on site currently owned by GU –

In the April 2006 EA a sketch of a possible boathouse for the site currently owned by GU was included. This drawing had numerous inconsistencies, and should not be used to demonstrate the claim that a university boathouse could be developed on that site. If that claim is to be made, a design consistent with the geometry and topographic limitations of that site must be offered. Such a design must also address the issue of how, and at what cost, utilities could be extended to that site. It is our belief that an easement for ingress and egress does not confer construction rights through the easement (those would have to be obtained separately), further clouding the potential usability of that site.

6) CCT Traffic Survey –

In September 2006 a trail use survey of the CCT was performed at the request of the Montgomery County Parks Department. Four locations along the CCT in the County were indicated, and a fifth location was added by the CCCT at the Georgetown Trailhead in DC. The Weekly Trail Uses at the Georgetown Trailhead came to 18,455 - just under a million per year. This, and other data obtained through the survey, should be incorporated into this EIS. The survey results can be accessed at <http://www.cctrail.org/CCCTsurvey.htm>, and the Montgomery County Parks Department's report is available at [http://www.mc-mncppc.org/board/agenda/2007/documents/20070719\\_Capitaltrail.pdf](http://www.mc-mncppc.org/board/agenda/2007/documents/20070719_Capitaltrail.pdf). If you have any problem accessing this information, please contact the CCCT, and we will provide a hard copy for the EIS. The survey data is presented in several formats, including Weekly Trail Uses, Hourly Uses In Each Time Period, Weekly Uses By Mode (bicyclists, walkers, joggers, etc.), Uses By Mode In Each Time Period, and Trail/Towpath Weekly Uses Comparison (with modal breakdown).

The following document contains meeting notes showing Superintendent Doug Faris' requested changes of 4/9/1996 to the Exchange Agreement between GU and NPS.

The Defenders of Potomac River Parkland obtained the document from NPS through a Freedom Of Information Act request.

Regarding the Superintendent's concerns about the height of the proposed boathouse, please note on the second page an item referencing page 8 of the Exchange Agreement, in which he indicates that the height should be at, or below, the height of the neighboring Washington Canoe Club boathouse.

COMMENTS ON GEORGETOWN UNIVERSITY LAND EXCHANGE

Glenn, I talked with Superintendent Faris this morning (April 9) regarding wording for the Quitclaim Deed and the Preliminary Agreement To Exchange Real Property. The following changes are needed based on the Superintendent's concerns.

**Quitclaim Deed:**

New inclusion re. open space language

line 4 - insert "collegiate" before "recreational boating".  
This is requested as a result of concerns of our advisory commission that the boat house will be used by alumni and university friends and not strictly as a "boathouse for students" as was stated in the FONSI.

Language needs to define what can be stored: "only university boats" and kind and quantity of fuel to be stored. Are we talking of propane or fuel oil for the building or are we talking about boat motor fuel and if so how much fuel do they need for chase boats? 50 gallons? Also storage area is limited to 1500 sq. ft.

New inclusion re. ingress and egress.

The Superintendent is adamant that due to the sensitivity of the Capital Crescent Trail and its supports that the trail from the end of K Street to where ever the University accesses their boathouse be widened at their expense to the full 15 feet wide right of way so that bicycles can have an unobstructed trail. There is no way that a vehicle with or without a boat trailer can be on the trail in its present width without obstructing it.

Also the trail that will be used by vehicles such as DC firetrucks and construction vehicles needs to be reinforced to support that kind of weight. We need to get an engineer to assess the trail and develop specs to accommodate these heavier loads so that GU will know how much they will need to do before construct can begin.

Add sentence to restrict delivery of construction materials and equipment to after dark to minimize impact to trail users.

Modify second paragraph to state that the repairs made by the university to the CCT are to conform to NPS specifications.

Last paragraph: need to reemphasize that only temporary parking is permitted at the boathouse site itself.

**Other Quitclaim Comments**

pg 3. Add "collegiate" in line 3 before "recreational"  
pg 6. Add "collegiate" in item 1. before "boating"

- What does "ancillary recreational" include in item 1.?
- pg 7. Same two comments as for pg 6. above for two places in first paragraph
- pg 8. First paragraph, section (b), the height of the GU boathouse should not be and higher than the existing historic boathouse of Washington Canoe Club. This height should be specified in this paragraph.
- pg 9. First paragraph: Add "university" before "shell storage", and also before "sailing equipment".  
First paragraph: section (m) replace with "temporary parking for loading and unloading vehicles"  
First paragraph: Add "collegiate" before "boathouse" in the eleventh line.

**Preliminary Agreement to Exchange Real Property**

- pg 2. Section (1) Add "collegiate" before "recreational"
- pg 6. Line 6. "two days" is too short unless they already can provide us with a testing plan specifying how they will be testing, how heavy the equipment will be, impact on CCT use, etc. We should state "within 10 working days after receiving an acceptable work plan from the University's environmental consultants".  
Line 8. Add "and/or to the Capital Crescent Trail" after "Tract 102-114"
- pg 8. Line 1. Add "collegiate" after "non-motorized"  
Line 2. Define "ancillary" and add "collegiate" before "recreational"
- pg 9. First paragraph, section B. and section (iv) should read the same as comments for pages 8 and 9 of the Quitclaim Deed above.  
Section (iv) Add "collegiate" before "program"
- pg 10 Add "collegiate" before "boathouse"
- pg 13 Section (16), Line 10 Add "collegiate" before "boating"
- pg 15 Why are we reimbursing the University under item (20) since this is mutually beneficial to both of us.