

**Robert B. Norris**  
**1801 45<sup>th</sup> Street, NW**  
**Washington, DC 20007**  
**(202) 333-3925**

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Mr. Kevin Brandt  
Superintendent, C&O Canal National Historical Park  
1850 Dual Highway, Suite 100  
Hagerstown, Md. 21742

Re: Georgetown University boathouse proposal-scoping comments (EIS):  
Another proposed alternative site

Dear Mr. Brandt:

In the announcement of its intention to prepare an Environmental Impact Statement (EIS) for the Georgetown University boathouse proposal, the Park Service stated that it would consider alternative sites for the boathouse which may include the site previously recommended by the Park Service within the C&O Canal NHP with two different configurations pertaining to the size and height of the boathouse, the site immediately east of 34<sup>th</sup> St. and adjacent to the site promised GW, and the site about a mile upstream from Key Bridge owned by the University. While I still maintain that the site at 34<sup>th</sup> St. is environmentally the best location for the University's boathouse, the Park Service apparently has overlooked another alternative site outside the C&O Canal Park. I have prepared a rough diagram which will help describe this potential site. To reiterate, the diagram is rough, not to scale, and the measurements are approximate. Let me explain.

A. Alternative Georgetown University boathouse site. This site, located just downstream from 34<sup>th</sup> and Water Sts., adjacent to the site promised GW, was identified as a possible site for Georgetown University's boathouse as early as the EA scoping session on January 11, 2005. It is now specifically identified by the Park Service as a possible alternative site for the University's boathouse notwithstanding the work already completed in the Georgetown Waterfront Park. This site, only 350 ft. from Key Bridge, is environmentally superior to all other mentioned sites. Two elegantly designed collegiate boathouses clustered at this location would anchor the western end of the Georgetown Waterfront Park and be an interesting architectural tour de force on the waterfront.

B. The GW boathouse site. This site, located between 34<sup>th</sup> St. and Key Bridge, has been promised to GW. To advance its claim, GW has purchased two townhouses (3524 and 3526 K St., NW) which GW intends to convey to the Park Service in return for this site. Before construction of a boathouse at this location may commence, the preparation of either an EA or an EIS is required.

C. Overlooked alternative site for Georgetown University's boathouse. This site, located between Key Bridge and the Potomac Boat Club is within the non-motorized boathouse zone but outside the C&O Canal NHP. This site consists of the following: about 84 ft. of empty space; about 108 ft. for Jack's; and about 54 ft. for the three town houses. With respect to the town

houses, the Park Service will acquire the first two (3524 and 3526) from GW in exchange for GW's boathouse site. The Park Service intends to purchase the third town house (3528 K St.) which is currently owned by the "3528 K St. Associates LP." The total space would be about 246 ft. east-west and about 84 ft. from the sidewalk on K (Water) St. to the top of the river bank with additional space below leading to the river. There is even more space under the first arch of Key Bridge if needed, with a width of 76 ft. and a depth of about 48 ft. from the Water St. sidewalk to the bottom of the arch. This site, with the dimensions mentioned above, provides more than enough space to accommodate all of Georgetown University's needs associated with its rowing program. But most important to the pending EIS, this site poses no environmental concerns. Of course, in order to acquire this property from the Park Service, the University would exchange its upriver parcel and its mile-long easement over the Capital Crescent Trail.

D. The proposed new site for Jack's. The old Dempsey site of about 135 ft. in width from the Aqueduct Bridge to the elevated sewer grate and 60 ft. in depth is more than enough to accommodate Jack's. Besides a colorfully painted office, most of Jack's operation consists of floating docks strung together on which kayaks and canoes are stacked. At this proposed new site for Jack's, a handsome and architecturally pleasing period-type boathouse/office could be constructed and floating docks installed for Jack's use.

E. The EA proposed GU boathouse site. This site, located 1,250 ft. inside the C&O Canal NHP near the entrance to the Capital Crescent Trail is environmentally unacceptable for a collegiate boathouse and should be rejected. The public's use and enjoyment of this treasured but congested area would be preserved. This site should remain untouched and the historic and scenic features of the C&O Canal NHP would be protected. Based on numerous and well-documented environmental, health and safety concerns, there was overwhelming opposition to this site during the EA process. Also, in its advisory role regarding specific matters related to the Park, the C&O Canal NHP Advisory Commission has rejected repeatedly this site for this boathouse. For these reasons, I find it bewildering that the Park Service, the guardian of our parklands, would once again even suggest this site for the University's boathouse.

To locate Georgetown University's boathouse either at sites A or C would cluster the University's boathouse, GW's boathouse, the Potomac Boat Club, Jack's, and the Washington Canoe Club around the commanding presence of Key Bridge thereby creating a "boathouse row." Since the boathouses for both GW and Georgetown University must be approved environmentally after the preparation of an EIS, the two projects should be considered together in the current EIS effort, thereby avoiding a duplication of effort and expense.

Respectfully submitted,

Robert B. Norris

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