



May 10, 2013

RE: Comments on Georgetown Nonmotorized Boathouse Zone Feasibility Study – Support for “Development Scenario 3, Low Density”

The Committee of 100 on the Federal City (C100) was founded in 1923 to act as a force of conscience in the evolution of the Nation’s Capital City. It was formed to sustain and to safeguard the fundamental values – derived from the tradition of the L’Enfant Plan and the McMillan Commission – that give the Nation’s Capital so much of its distinction, its beauty, and its grace as a community. The Committee is dedicated to providing responsible oversight in all pertinent aspects of community development. These include parks and conservation, historic preservation, visual planning and architecture, land use regulation and renewal planning, pollution control and environmental protection, and transportation planning.

C100 is pleased to submit comments to the National Park Service on the Georgetown Nonmotorized Boathouse Feasibility Study. The Comprehensive Plan for the National Capital District Elements and a review of past studies provide both land use planning guidance for the future development of the waterfront area and historic context to aid current decision making. C100 participated in the stakeholder focus groups as well as previous opportunities for discussion on the Nonmotorized Boathouse Zone (NMBZ).

The task of programming appropriate uses for the site requires a plan that can accommodate multiple uses in concert with ever growing demands for recreational uses of the river. Over time, there has been clear evidence that interest in competitive rowing on the high school and collegiate levels has grown significantly and there has been an increase in the number of individual rowers as well. The competing needs among groups of rowers have grown and include a need for training facilities and more storage facilities. It is likely this demand will continue to grow over time. Recreational paddlers also use this area of the river, often in conflict with rowers. In addition, bikers, joggers and walkers along the Capital Crescent Trail, which runs parallel and adjacent to the river, add an additional layer of users of the NMBZ. Balancing the needs of all users of the river and adjacent land area while avoiding conflicts is no small feat but must be addressed.

It is the understanding of C100 that the feasibility study will lay the groundwork for future decision-making regarding: (1) scenarios for development/improvement of NPS facilities or potential land exchanges for private development of boathouses; and (2) further planning and National Environmental Policy Act/National Historic Preservation Act (NEPA) compliance as necessary to implement the NMBZ. In addition to NPS, the NMBZ study will also be reviewed by the National Capital Planning Commission

(NCPC), the Commission of Fine Arts Old Georgetown Board and Advisory Neighborhood Commissions. Other consulting parties, including the Advisory Council on Historic Preservation and the DC SHPO are encouraged to offer comments; and, it is in this context that C100 submits its comments on the various development scenarios.

The Near Northwest Area Element of the Comprehensive Plan notes, “The extension of the [Georgetown] waterfront park from Washington Harbor to the Key Bridge remains a high priority. When the proposed 10-acre waterfront park is completed, the goal of closing the one remaining gap in an otherwise continuous park extending from Haines Point to the District of Columbia line will be achieved.” This area of the river was once a highly intense industrial zone. It was a thriving port from which the City of Georgetown grew and expanded. Over time, with the demise of the port and industrial uses along the river, the river banks returned to a scenic park-like setting with open vistas across the Potomac to Virginia and as far as the eye can see up and down the river. Only the current low profile boathouses are nestled into the shoreline.

Development Scenario 1, High Density and Scenario 2, Medium Density, propose major new construction inside the C&O Canal NHP as well as significant height and density on degraded land outside the C&O Canal NHP, including a partial fourth story at Site D, adjacent to Key Bridge just west of Water Street. The top of the roof plus embellishments of Site D, in both scenarios, would be level with the Whitehurst Freeway. This same outcome would be true in Scenario 1, Site E, adjacent to Key Bridge just east of Water Street. While there is no documentation from the DC Department of Transportation regarding the safety of this potential distraction it is nevertheless a concern. Scenarios 1 and 2 propose height and density which is inappropriate and excessive given potential impacts to surrounding cultural and historic resources, including the Washington Canoe Club, the prime waterfront land under consideration, the important viewsheds within the Potomac Gorge and the C&O NHP, which receives more visitors each year than Yellowstone National Park.

All three scenarios propose reconstruction of the Washington Canoe Club, a historic resource located inside the C&O Canal NHP, including site restoration and rehabilitation of the structure. The Canoe Club predates the establishment of the C&O Canal NHP.

Development Scenario 3, Low Density, is the most appropriate scenario of the three proposed, and most closely aligns with the NPS’ mission of stewardship of public parkland. It is also the only scenario C100 can support as it is more aligned with guidance offered by the Comprehensive Plan. This scenario proposes lower scale development than at sites proposed in Scenarios 1 and 2, permits greater stabilization of the Potomac River Banks, helps establish clean tidal flats, reduces erosion along the Potomac shoreline and along Rock Creek, preserves more of the existing forest cover and acknowledges the sensitive natural historic and cultural resources within the C&O Canal NHP. Scenario 3 meets the important goal of preservation of the forest canopy, which preserves habitat for native and migratory birds and animals that rely on forest cover for their survival. Height would be consistent with existing nearby buildings and would have limited visual impact on the context of the urban and industrial character of the NMBZ. Site E is adjacent to the Georgetown Waterfront Park, a recently established open urban park area of the riverfront that was developed using a former industrial site. This new park setting should not be overwhelmed by too-tall buildings that do not relate to or respect its purpose and open landscaped setting.

The NMBH study notes, “The ultimate number, size, and location of new structures in the zone will require further study to ensure that development balances the needs of all users and protect the historic, cultural, and environmental resources of C&O Canal NHP and Rock Creek Park.” It is unclear that Scenarios 1 and 2 offer those protections. C100 opines that it would be unfortunate if the Georgetown Waterfront Park Master Plan were opened to reexamine the extent of the zone as the plan was developed following a lengthy public process.

C100 supports further study of Development Scenario 3, Low Density, and encourages NPS to move this scenario forward for further consideration based on good data, quantifiable reliable benchmarks and consideration of the Comprehensive Plan’s Land Use Element, the cornerstone of the Plan, which establishes the basic policies guiding the physical form of the city and provides direction on a range of development, conservation and land use compatibility issues. It recognizes the necessity to balance competing demands for finite land resources and that growth and new development need to be directed to achieve economic vitality while minimizing adverse impacts on open space. With proper land use planning, Scenario 3, Low Impact, can achieve the balance necessary to establish a nonmotorized boathouse zone while meeting the needs of all users of and visitors to the C&O Canal National Historical Park.