

**ADVISORY NEIGHBORHOOD COMMISSION 3D
PO BOX 40846
PALISADES STATION
WASHINGTON, DC 20016**

June 15, 2006

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

Re: Comments on the Georgetown University Boathouse Environmental Assessment

Dear Mr. Brandt:

Advisory Neighborhood Commission 3D is pleased to furnish the enclosed comments on the Environmental Assessment prepared by the National Park Service to identify and address potential impacts associated with construction and operation of a boathouse (non-motorized) on the Potomac River for the men's and women's crew teams at Georgetown University.

By way of background the Commission has submitted earlier letters to Fran Mainella and Joe Lawler; and, furnished testimony on the boathouse at the Public Roundtable held by Councilmember Carol Schwartz on June 22, 2005. Ironically, the three or so miles of the C&O Canal Historical Park that lie within the District of Columbia are located within the boundary of ANC 3D, yet only ANC 3E, located in Georgetown, was included in official discussions with various groups on the boathouse. Nevertheless, ANC 3D has continued to register its strong opposition to what is being proposed.

Earlier questions on the EA were submitted to Richard Dorrier, Vice President of EDAW, followed the May 23, 2006, public meeting on the Environmental Assessment. It is my understanding that they also will be included in comments on the Environmental Assessment.

Sincerely,

Alma H. Gates
Chair, ANC 3D

Enclosure (1)

Comments of Advisory Neighborhood 3D

1.0 Purpose and Need

1.1 Introduction

“The NPS is interested in protecting the 1.09 acre upstream parcel due to the presence of remnants of the historic incline plane and vehicles along the Capital Crescent Trail to access the site.” One feels compelled to question whether or not the same concerns are being applied to the proposed site; and, what makes Tract 102-114 less worthy of protection than the University’s upstream site that could not support a large boathouse, the needs of an ambitious rowing program or its associated traffic.

1.2 Background

The premise that the NPS is willing to permit the use of public parkland for a private institution that has outgrown its campus should set off bells ringing across the land. “The project site is located within the C&O Canal NHP that was established by Congressional Legislation in 1971 ‘to preserve and interpret the historic and scenic features of the Chesapeake and Ohio Canal, and to develop the potential of the canal for public recreation.’” Herein lies the root of the problem, the boathouse is a private facility within the park that will only be accessible to Georgetown University affiliates.

1.3 Purpose and Need

“The purpose of the proposed action is to construct a modern boathouse facility that would provide training ... and enable the program to successfully compete in National Collegiate Athletic Association (NCAA) rowing events. Georgetown has had a rowing program for a number of years and from all appearances is currently competing in NCAA events while rowing out of Thompson’s Boathouse.

One of the most common justifications put forth is that by moving Georgetown out of Thompson’s, a huge amount of space for high school rowers would open up. In fact 40 slips at most would be vacated and made available.

1.4 Program for the Proposed Boathouse

Program Elements

“The boathouse facility is being proposed to accommodate the immediate and long-term needs of the University’s men’s and women’s teams ... In addition, the University has identified the need to accommodate an exercise area ... The proposed boathouse would also include crew coaches’ offices ... Boathouse facilities in the Georgetown Waterfront Park will not include outside boat storage or equipment in order to facilitate use of the surrounding grounds by the general public.” The public will not be

allowed to use or enter the proposed boathouse but the surrounding land may be used by the general public. This is an extraordinary determination by NPS for use of public parkland by a private institution.

Factors Influencing Boathouse Design

“... site factors including zoning requirements and floodplain issues have a direct influence on boathouse design. The application of Georgetown University to build the first boathouse since the adoption of a Zoning Code by the District of Columbia required the establishment of a new zoning classification for this land use. Even FEMA provided regulations as the proposed site is within a 100-year floodplain.

1.6 Relationship to Other Projects and Plans

It is a well know fact that rowing has become a very popular sport. Each class of rower and school share one common need – access to water. The location of the Georgetown boathouse will serve the needs of the university, a private institution that is tax exempt in the District of Columbia. So too is George Washington University that is considering a boathouse within NPS property between Key Bridge and 34th Street. Both of these institutions hold a carrot the NPS wants and both are willing to trade up for what they know the NPS wants. More and more, whether special exception or rezoning, is being given to these institutions that place considerable strain on local resources and infrastructure.

1.8 Impact Topics Included in this Document

A wide range of potential impacts were examined in the EA. The visual impacts of a large boathouse perched on the bank of the river blocking river views from Capitol Crescent Trail users will have huge impact. Already the University’s campus buildings loom over the Georgetown skyline and campus density has notably increased in recent years.

One must only drive along the Whitehurst Freeway and look at the impact of the new Swedish Embassy and office building to understand the visual impact that will experienced. It is difficult to appreciate the view when faced by a solid building wall.

The damage to the C&O Canal Historical Park cannot be mitigated and there are no plans to mitigate or avoid damage along the narrow recreational corridor.

A traffic audit of potential impacts to the Capitol Crescent Trail by trailers, trucks and student cars is missing from the EA. The area between Wisconsin Avenue and the proposed boathouse site is narrow and, if the Whitehurst Freeway is removed, this same area will become a major thoroughfare for commuters from Maryland, Virginia and the District.

The public has become keenly aware of the importance of wetlands ever since the Katrina disaster. Removing these natural shoreline buffers for a private boathouse places other bank areas in jeopardy because the natural flow of water is interrupted.

Flooding along lower K Street is often an annual event. Removing natural barriers and wetland places parkland and the river bank in jeopardy. On page III-20, the EA notes an earlier Georgetown Boathouse that “[b]y 1891 however, ... had washed away, lasting for only one year.” Perhaps the earlier boathouse was not well engineered, but the proposed boathouse will use of retaining walls and pilings both of which will create environmental impacts.

An 84-inch sewer line runs beneath the proposed boathouse site. Should the pipe rupture for any reason during construction impacts to public health would be substantial.

Conclusion

The National Park Service is using land bartering to obtain the necessary pieces for its waterfront park while destroying the C&O Canal Historical Park. This will prove a costly mistake. ANC 3D does not support the proposed Georgetown University boathouse in its current location or its current size.

The Environmental Assessment leaves more questions unanswered than answered. It is clear EDAW provided its client with its best attempt at justification, however the EA falls short of the mark, however alternatives have not been explored.