

Robert B. Norris
1801 45th Street, NW
Washington, DC 20007
(202) 333-3925

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National Capital Planning Commission
401 9th St., NW
North Lobby, Suite 500
Washington, DC 20004

Attn: Mr. Gene Keller

Re: Georgetown University Boathouse proposal and related concerns

Dear Members of the Commission:

I hereby request that the National Capital Planning Commission place the National Park Service proposal on the Georgetown University boathouse on the agenda for the April 6, 2006 Commission meeting. Besides finding an environmentally compatible site on the Potomac River for this boathouse, the discussion and resolution of this issue would also entail the need to create a beautiful and interesting urban park on the Georgetown waterfront and the protection and preservation of the integrity of the C&O Canal National Historical Park. Although the Park Service has consistently attempted to separate the C&O Canal Park and the proposed Georgetown Waterfront Park, the two are inexorably intertwined.

To those who would argue that this request is premature, the answer is simple: there are currently enough facts on the table to enable one to make an informed judgment about the propriety and efficacy of the proposal of the Park Service to place a private boathouse in the C&O Canal Park. And, because this matter would eventually in due course reach the Commission for a determination, much time, expense, and effort can be avoided by action now. As the principal federal planning agency for the District of Columbia, this is all together appropriate.

There currently appears to be general acceptance within the Park Service that Georgetown University should be allowed to construct a private boathouse in the C&O Canal National Historical Park at the gateway to the Capital Crescent Trail. This is not the first time the Park Service has proposed an ill conceived project. While almost incomprehensible, a little over 50 years ago, the National Park Service proposed turning the C&O Canal into a vehicle highway. Fortunately, this wrong-headed proposal was stopped in large part by the leadership of the late Justice William O. Douglas. This current project, while not so damaging as the highway proposal, is nevertheless wrong, as I will explain.

Let me be clear. I support a boathouse for Georgetown University on the Potomac River, but not at the location proposed by the Park Service within the C&O Canal National Historical Park near the entrance to the Capital Crescent Trail. I understand that the Georgetown Waterfront Commission, a relatively small group of Georgetown residents, is on record in support of

Georgetown University's boathouse at this location. The Commission's action was not based on sound urban planning nor did it consider the size of the boathouse proposed by Georgetown University. The real reason behind this position was to exclude this boathouse from consideration at an alternative site at the western edge of the Georgetown Waterfront Park. While I do not question the hard work and devotion of these residents, I do question the somewhat narrow focus of their perception of the design and contents of this urban park and their refusal to even consider the adverse environmental impact of locating this boathouse in the C&O Canal Park. As federal parkland, the Georgetown Waterfront Park belongs not to a small group of residents of Georgetown, but to all of us.

Any structure, and especially a collegiate boathouse at the proposed site, would have an adverse environmental impact and restrict the public's use and enjoyment of this treasured area. Indeed, a boathouse at this location would do violence to the historic and scenic features of the C&O Canal. It would only be accessible over the Capital Crescent Trail which of course is used by bikers and hikers every day of the year. This colossus of a boathouse would be crammed into a relatively small area and would dwarf its immediate downstream neighbor, the historic Washington Canoe Club. It would also loom over the C&O Canal towpath. Indeed, at this location, it would be the McMansion of all boathouses. The proposed dock for this boathouse, jutting some 75 feet into the river, would impinge on the traditional training area used by the Canoe Club for over 100 years.

The proposed location of this boathouse also poses the potential for a hydrological disaster when the next large flood occurs, as surely it will sometime in the future. Powerful currents moving downstream in a flood will be channeled and squeezed between the proposed boathouse nearly 300 feet in length and the C&O Canal embankment. When this happens, the force of the water is magnified and the damage resulting therefrom would be more severe than if the flood waters flowed over a wider area. In fact, this magnified rush of water would probably rip the embankment apart.

As now imposed, the non-motorized boathouse zone extends from 34th and Water Sts. to a point variously described by the Park Service as somewhere between 1,100 and 1,250 feet upriver from Key Bridge. This ambiguity as to the upriver boundary obtains because, as a representative of the Park Service testified at a hearing before the DC Council on June 22, 2005, there is no "hard line in the woods" but just a "general guideline." If this zone can be extended from 1,100 to 1,250 west of Key Bridge, why not a similar extension east of Key Bridge.

The only justification by the Park Service for the boundaries of the non-motorized boathouse zone is based simply on the fact that these boundaries were established in the 1987 Plan for the Georgetown Waterfront Park and the C&O Canal National Historical Park. Nearly 20 years old, this Plan is outdated and fails to address the changing needs of the public in 2006. These arbitrarily drawn boundaries fail to recognize the ever expanding public interest in water-related activities as evidenced by the growing number of rowing programs. Indeed, this restrictive boathouse zone is strangling the expansion of the recreational use of the river. Since the promulgation of the Plan in 1987, the Capital Crescent Trail has been established and developed.

In terms of land use planning, the entire waterfront from Washington Harbour to the Washington Canoe Club should be treated as one integrated and comprehensive area. This would allow for a review and needed modification of the 1987 boundaries which are no longer relevant. In order to protect the integrity of the C&O Canal National Historical Park and the entrance to the Capital Crescent Trail, the proposed site for Georgetown University's boathouse in the Park and immediately upstream from the Washington Canoe Club should be eliminated, once and for all, from any further discussion. For all the reasons well documented in the public record, this particular site for a boathouse is an obvious mistake. If a land use planning mistake has been made, it is far better to correct it now than to regret the consequences of the mistake in the future when corrections may be impossible. What is now needed is a plan with a clear vision for the future which accommodates current realities.

While some would prefer an entirely passive park of trees, grass, walkways and benches, there is no good reason for this type of park to consume the entire 10 acres of the proposed Georgetown Waterfront Park. The artificially and arbitrarily drawn boundary separating the Georgetown Waterfront Park from the non-motorized boathouse zone should be redrawn to reflect the changing needs of the public. Since the Georgetown Waterfront Park is approximately 10 acres, locating Georgetown University's boathouse on a site at the far western edge of the Park adjacent to George Washington University's site would amount to just a small intrusion of less than an acre in a portion of the Park now planned as a buffer of grass and trees. Parenthetically, the 1987 Plan provided for a floating restaurant with space for 86 automobiles at the site now designated for GW's boathouse. As you know, the labyrinth has been shifted approximately 350 feet downstream thereby providing ample space for the boathouse. Most of the currently approved design for the Park would remain in place.

A boathouse at this alternative site would not restrict views to the Park and the river along street corridors perpendicular to Water St. Georgetown University and GW could share access roads and docks, thereby reducing the environmental impact on this area. This site is also deeper and more readily accessible than the originally proposed site. And it would also raise few, if any, NEPA issues. Of course, Georgetown University would bear the cost of site preparation, bulkhead renovation and new construction in this portion of the Park, thereby shifting some of the considerable expenses away from the Park Service and the National Park Foundation. Of critical importance to many, the Park Service has the leverage to insist that the boathouse be well designed and appropriately reduced in size. With the ever expanding public interest in water-related activities, a boathouse at this location would be a contemporary reminder of the early history of Georgetown as a port. In conclusion, two elegantly designed collegiate boathouses, side by side, would anchor the western end of the Park and could be an architectural tour de force.

The draft Environmental Assessment (EA) on the Georgetown University boathouse has been scrapped and a new EA is being prepared from scratch. For the reasons advanced above, as well as by numerous other individuals, it is now abundantly clear that the proposed site for this boathouse within the C&O Canal National Historical Park near the entrance to the Capital Crescent Trail is a land use planning and environmental mistake. Thus, the Park Service, Georgetown University and the public in general have an opportunity to correct this mistake.

I am also constrained to mention another disturbing aspect about the current attitude within the Park Service. On Friday, January 20, the C&O Canal Advisory Commission passed a resolution stating that the proposed site within the C&O Canal Park is “inappropriate” for a private collegiate boathouse. This message and advice of the Advisory Commission to the Park Service is unambiguous: the National Park Service should eliminate from any further consideration the proposed site within the C&O Canal National Historical Park for Georgetown University’s boathouse. The C&O Canal Association has also taken a similar position on this matter. In addition, Defenders of Potomac River Parkland, an alliance of 19 national, regional and local civic, recreational and environmental organizations, ANC3D and Federation of Citizens Associations of the District of Columbia have voiced their opposition to the Georgetown University boathouse proposal. It is a sad commentary on the current attitude of the National Park Service when it ignores the advice of these organizations, many of which are specifically devoted to the protection and preservation of the C&O Canal National Historical Park.

In conclusion, for the reasons set forth above, I submit that the Georgetown University boathouse proposal is flawed ab initio. In these circumstances, I urge the Commission to use its considerable influence to assist in finding an environmentally acceptable site for the University’s boathouse while at the same time enhancing the amenities possible for the Georgetown Waterfront Park. Thus, I respectfully ask the Commission to recommend to the National Park Service the following:

- (1) that the Park Service postpone and delay any further work on the Georgetown Waterfront Park until the Environmental Assessment on the Georgetown University boathouse proposal is released to the public and resolved;
- (2) that the Park Service eliminate from any further consideration the proposed site in the C&O Canal National Historical Park for Georgetown University’s boathouse; and
- (3) that the Park Service give full consideration to the alternative location at the western edge of the Georgetown Waterfront Park adjacent to George Washington University’s boathouse site for the Georgetown University boathouse.

In order to keep the Park Service apprised of my request, I am sending a copy of this letter to Fran P. Mainella, the Director of the National Park Service.

Thank you for your consideration of this matter.

Respectfully submitted,

Robert B. Norris

cc. Hon. Fran P. Mainella