

(Text of letter from Robert B. Norris to John G. Parsons, Commissioner, NCPC, 2/8/07, re. Proposed Georgetown Waterfront Park and related matters, NCPC File No. 6383)

Dear Mr. Parsons:

The purpose of this letter is to correct and clarify comments you made on February 1, during the discussion of the Georgetown Waterfront Park matter.

You stated to your fellow Commissioners that “historically” boathouses were located above Key Bridge implying that the site within the C&O Canal National Historical Park proposed by the Park Service in the pending Environmental Assessment (EA) was such a site. This assertion is incorrect. Indeed, the EA actually shows that boathouses were “historically” located at and downriver from 34th and Water Streets. For a more detailed description of this “history” as disclosed in the EA, I direct your attention to page 4 of my letter to Kevin Brandt, dated June 12, 2006, a copy of which I enclose herewith.

As you know, an alternative site for Georgetown University’s boathouse was identified at the EA scoping session on January 11, 2005. This site, adjacent to and immediately downriver from the boathouse site promised George Washington University at 34th and Water Streets, is located at the far western edge of the proposed 10-acre Georgetown Waterfront Park in an area planned as a buffer of grass and trees. Little did we know at that time that the “history” of boathouses on the Georgetown waterfront in fact supports the selection of this site for the University’s boathouse.

You also stated during the Commission discussion that the purpose of the non-motorized boathouse zone was to “cluster” boathouses around Key Bridge. The only site proposed in the EA by the Park Service is some 1,100 to 1,250 feet upriver from Key Bridge. The above-mentioned alternative site at 34th and Water Streets, is about 350 feet downriver from Key Bridge. If the desired intent is to “cluster” boathouses around Key Bridge, this is better achieved by the alternative location next to GW’s boathouse site. Two elegantly designed collegiate boathouses “clustered” at this site would anchor the western end of the Georgetown Waterfront Park.

And finally, I was surprised by your deprecation of my efforts to convince the Commission of the need for an Environmental Impact Statement (EIS) for Georgetown University’s boathouse that would consider alternative locations outside the C&O Canal National Historical Park, including the above-identified site at 34th and Water Streets. Although officials of the Park Service have not committed to an EIS, there seems to be a growing sympathy for such a course of action. As you know, Park Service Deputy Director Steve Martin, at a meeting on November 13, 2006, stated that the Park Service was giving serious consideration to the preparation of an EIS. In this connection I request that you review my letters to Joseph M. Lawler, dated November 27, 2006, and January 9, 2007, copies of which are enclosed herewith.

The reasons for an EIS are compelling. One, the waterfront should be treated as one comprehensive area for planning purposes. This would avoid piecemeal planning. The preparation of an EIS would enable the park Service to revisit artificially and arbitrarily drawn boundaries and develop a boathouse plan consistent with current realities. Two, the Park Service is relying on a 1984 EA of questionable legality as the only NEPA review for the proposed Georgetown Waterfront Park. Twenty-three (23) years old, and prepared without public notice, comment or

review, this EA is completely out-of-date and fails to meet current needs and realities. Moreover, an EA must consider all the cumulative impacts of a project. This EA fails to satisfy this requirement. This is not a trivial issue. And three, the preparation of an EIS would cure the legal deficiencies of the 1984 EA and the 1987 Georgetown Waterfront Park Plan upon which this is based.

As I stated to the Commission at the hearing on February 1, it is not my intention to seek a delay in the work on the Georgetown Waterfront Park, but only that the alternative site which was identified over two years ago remain viable as a prospective location for Georgetown University's boathouse. In this connection, I'm still waiting for you to provide me with the schedule of work on Phase I that you promised at our meeting on December 20, 2006.

In order to promote some dialogue about the matters raised in this letter, may I suggest a response by you in indicated.

Sincerely yours,

Robert B. Norris

cc. Chairman and Members of the Commission