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April 18, 2007

Mr. Joseph M. Lawler
Regional Director, National Capital Region
National Park Service
1100 Ohio Dr., SW
Washington, DC 20242

Re: Proposed Georgetown Waterfront Park and related matters

Dear Mr. Lawler:

Thank you for your letter of February 26. Upon reflection, I believe a response is indicated.

With respect to your statements regarding the 1984 Environmental Assessment (EA), I enclose herewith a copy of my letter to Fran P. Mainella, the former Director of the National Park Service, dated July 19, 2006. I submit that the contents of this letter accurately describe the situation regarding this alleged "EA." To summarize, calling a document an "EA" doesn't make it an EA.

It is clear that this "EA," dated "June 1984" never underwent public notice, comment or review. Since the FONSI was issued on June 27 1984, it is obvious that there was little or no time for public comment or review. In any event, there is no evidence, documentary or otherwise, that this "EA" was ever made public in 1984.

As you know, I was also provided on July 14, 2006 with 39 miscellaneous documents covering 117 pages consisting of letters, statements, resolutions, maps, diagrams, questionnaires and minutes, which I understand you regard as public comment and review. All but one – a letter from the Chair of the C&O Canal National Historical Park Commission dated March 12, 1984 – were dated after the FONSI issued. In fact, most of the material is dated in 1985 and 1986. Hence, this material cannot be construed as public comment on the 1984 "EA" which purports to be the basis for the FONSI. The same observation can be made about the Hearing, chaired by Mr. Parsons on April 16, 1985. With respect to the "Compliance Summary," which you approved on October 5, 2005, it is obviously a belated self-serving attempt by the Park Service to do indirectly what it failed to do directly.

According to the "Compliance Summary," the Park Service contends that the Georgetown Waterfront Park Plan, which was offered to the public in 1987, was based on the 1984 "EA." However, the 1987 Plan makes no mention of either the 1984 "EA" or the FONSI. The failure to mention them substantiates my claim that the public was never made aware of either of these documents before you sent them to me on July 14, 2006. Apart from the serious problems of the

obvious absence of public notice, comment and review, this “EA,” now 23 years old, is completely obsolete and should be supplemented as it fails to meet current needs and realities.

In your letter you state that the “purpose of [the non-motorized boathouse] zone was to place the boathouse architecture where it had been historically, to cluster it around the commanding presence of Key Bridge, and to develop a boathouse row as a signature architectural composition of the waterfront.” May I direct your attention to my letter to you dated July 11, 2006, in which I explained that the Environmental Assessment (EA) on the Georgetown University boathouse proposal actually shows the boathouses were “historically” located at and east of 34th and Water Sts., the alternative site many of us have recommended for the University’s boathouse. (See EA III, pp. 17-20.) For your convenience, I enclose a copy of my July 11 letter. Parenthetically, the establishment of the non-motorized boathouse zone was not suggested or otherwise discussed in the 1984 “EA.” Hence, it, along with other features of the Georgetown Waterfront Park, were not subjected to a formal EA or EIS with a concluding FONSI.

As you know, the only site proposed by the Park Service in the EA on the University’s boathouse proposal is some 1,100-1,250 upriver from Key Bridge. The alternative site, which we have identified at 34th and Water Sts., is 350 feet from Key Bridge. If the desired intent, as you have indicated in your letter, 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 establish as envisioned by the Park Service a “boathouse row” which could be a “signature architectural” tour de force on the waterfront. With respect to these issues, I enclose a copy of my letter to John Parsons dated February 8, 2007.

I would be remiss if I didn’t acknowledge your kind statement that the Park Service is “seriously considering [my] comments on this matter,” which I attempted to summarize for you in my letter of January 9, 2007. Because of my concern that the work performed on Phase I of the Georgetown Waterfront Park might be used as an excuse or reason for eliminating this alternative site from consideration, I very much appreciate your concluding statement that completion “of this Park . . . does not foreclose . . . a boathouse in the location that [I] have proposed.”

If you have any questions regarding the contents of this letter, please do not hesitate to contact me. Of course, I would more than welcome any response you may have to my observations.

Because of her continued interest in this matter, I am sending Director Bomar a copy of this letter as well as your letter of February 26.

With every best wish.

Sincerely,

Robert B. Norris

cc. NPS Director Mary Bomar

