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Mr. Peter May
Associate Regional Director
National Capital Region
National Park Service
1100 Ohio Dr., SW
Washington, DC 20242

Re: Feasibility Study to Implement a Non-Motorized
Boathouse Zone along the Georgetown Waterfront

Dear Mr. May:

In announcing the above-referenced Feasibility Study, the National Park Service stated that it will examine (1) "What facilities and uses can be accommodated in the zone?" and (2) "How many facilities can be accommodated, and where might they be placed?" It is my intention in this letter to provide workable and compelling answers to these questions. The proposed non-motorized boathouse zone "includes the waterfront land from immediately upstream of the Georgetown Waterfront Park at 34th St., to approximately 1,200 ft. upstream of the Key Bridge", a site immediately upstream from the Washington Canoe Club. While the Study seems to suggest that there are four sites within this zone, only three are acceptable. For the three remaining sites, there happen to be three obvious stakeholders: George Washington University, Georgetown University and Jack's.

With respect to the unacceptable site, the Park Service should, once and for all, deep six the upstream site originally proposed for Georgetown University's boathouse in the 2006 Environmental Assessment. This site, about 1,200 ft. inside the C&O Canal NHP, is near the entrance to the Capital Crescent Trail. It is environmentally unacceptable for potential development and should be rejected. The public's use and enjoyment of this treasured but already congested area would be preserved. This site should remain untouched and the historic and scenic features of the C&O Canal NHP would be protected. Based on numerous and well documented environmental, health and safety concerns, there was overwhelming opposition to this site during the above-mentioned EA process. Also, in its advisory role regarding specific matters related to the park, the C&O Canal Advisory Commission repeatedly rejected this site for a boathouse.

Of the three remaining sites, George Washington University has been promised the site located between 34th St. and Key Bridge. To advance its claim, GW purchased two of the three townhouses (3524 and 3526 K St.) which GW intends to convey to the Park Service in exchange for this site.

The Park Service and Georgetown University should give serious consideration to locating the Georgetown University boathouse on the site commonly referred to as "Jack's." This site is the area between Key Bridge and the Potomac Boat Club and includes the three town houses. With respect to the town houses, the Park Service will acquire the first two (3524 and 3526 Water St.) from George Washington University in exchange for GW's boathouse site between Key Bridge and 34th St. As things stand now, the Park Service intends to purchase the third town house (3528 Water St.) which is currently owned by "3528 K St. Associates LP". The Park Service would then have the town houses razed as they are considered inappropriate for that location anyway. Of course, in order to acquire this property from the Park Service, Georgetown University would exchange its upriver parcel and its mile-long easement over the Capital Crescent Trail.

During the aborted EIS process, Alan Harwood, a consultant with EDAW, estimated the length of Jack's site along the river at 200 ft., along Water St. at 230 ft., and the depth from the street to the river about 100 ft. Actually, the useable space at this site exceeds Mr. Harwood's estimate. Nevertheless, if the average length of this site is about 215 ft., the square footage of Jack's site is approximately 21,500 sq. ft. Since the Park Service intends to limit the footprint of Georgetown University's boathouse wherever it may ultimately be located to no more than 15,000 sq. ft., there is obviously more than ample space at Jack's site to accommodate all of the University's needs associated with its rowing program, including an interior rowing tank. Surely the University's architect can design such a boathouse for this site. Parenthetically, the planned boathouse for GW has a footprint of about 13,500 sq. ft. and it too will have a rowing tank.

There are many advantages for locating GU's boathouse at this site. This site is within the non-motorized boathouse zone but outside the C&O Canal NHP. This site, unlike sites within the Park, would not adversely impact the historic and scenic features of the C&O Canal. Even with a footprint of 15,000 sq. ft., a boathouse in the C&O Canal Park at the old EA site would dwarf its next door neighbor, the historic Washington Canoe Club. Also, there would be no height restrictions on the boathouse at this site. And, since the site fronts on Water St., unlike any proposed site within the Park, it is easily accessible with no requirement for a vehicular turnaround. This location would also avoid the safety problems inherent in the congestion at the somewhat narrow gateway of the Capital Crescent Trail which is used by hundreds of bikers and hikers every day of the year. And finally, this site

poses no environmental concerns. But most important, the selection of this site will have wide public support.

A brief word about the future of Jack's Boathouse, a long-time popular venue. It should be moved to the site located adjacent to the Aqueduct Bridge, known as the Dempsey site. It would be easy to move the small office building currently located in the parking lot. Jack's rental operation consists ostensibly of floating docks strung together on which kayaks and canoes are stacked. Thus, moving Jack's operation to this site would result in only a minor inconvenience. By placing Jack's next to the Washington Canoe Club, there would be the additional benefit of grouping like uses (paddlers) side by side on the waterfront. By the same token, to place Georgetown University's boathouse at the former Jack's site would locate the University's boathouse between GW and the Potomac Boat Club, again grouping like uses (rowers) together.

The adoption of the recommendations contained in this letter would "cluster" GW's boathouse, Georgetown University's boathouse and the Potomac Boat Club, thereby creating a "boathouse row" around the commanding presence of Key Bridge. As an additional inducement for this proposal, the high school rowing programs would also benefit. Since Georgetown and GW would vacate the Thompson Boat Center, it would reduce substantially the currently overcrowded conditions in that facility. And, as a gesture of community good will, Georgetown and GW might consider allowing some of the high school rowing programs the use of their facilities on a time and space availability basis.

Since the boathouses for both GW and Georgetown University, as well as the relocation of Jack's boathouse, must be approved environmentally after the preparation of either an EIS or an EA, the projects could be considered together, thereby avoiding a duplication of effort and expense.

I hope these recommendations will be useful to you in the ongoing Feasibility Study. In order to promote transparency, I am also submitting this letter as a comment to be posted on the project website.

Sincerely yours,



Robert B. Norris