

MR. \_\_\_\_\_: And then, we could flip on....

MR. \_\_\_\_\_: We could flip you on (inaudible).

MR. \_\_\_\_\_: ....the TV.

MR. \_\_\_\_\_: (Inaudible).

MR. \_\_\_\_\_: Did you turn it on?

MR. PARSONS: Yes.

MR. \_\_\_\_\_: Okay. Oh.

MR. \_\_\_\_\_: I'm live.

MR. \_\_\_\_\_: You're live (inaudible).

(Commission members speaking simultaneously.)

MR. \_\_\_\_\_: I can't see all of us. So, I guess I'll have to stand over here to do what (inaudible).

MR. \_\_\_\_\_: How is that for volume, Sheila? Is that all right? Can you hear me?

CHAIRMAN WEIDENFELD: Yes, that's good.

MR. \_\_\_\_\_: Oh, good, good.

CHAIRMAN WEIDENFELD: There is an echo going.

MR. \_\_\_\_\_: (Inaudible)?

CHAIRMAN WEIDENFELD: No.

MR. \_\_\_\_\_: I said, "Good, good."

(Laughter)

CHAIRMAN WEIDENFELD: Okay everybody, here we go.

MR. PARSONS: I guess the best thing to do is to go through what we did the other night; although, some of you were there. I appreciate you very much.

There were 110 people there. And, we also, of course, took all of the comments that they gave us. It was done in a fashion where there were tables of ten and each one had a facilitator. That is an individual who wrote on easels or that is tablets for the comments that were received, which is a real skill. I was talking to Chuck earlier this about that. It is people who can listen to people ramble on and then get their comments down so they're satisfied. Those are all being recorded now by the consultants and will be tabulated and consolidated into categories, of course.

We're getting a lot of mail. A lot of people have found it frustrating. As you may know, our mail still goes for an anthrax check in Ohio and takes three weeks to get to our office. That's why we have asked people to e-mail, or hand-carry, or fax. And, it seems to be working well. We don't want it to get lost in the mail, which is an old term that I haven't heard in a long time. It's only for the Federal government.

Anyway, we have four consultants that are really terrific. I'm really pleased with them. Edall is the lead consultant. That is an environmental and planning and landscape architectural firm. And, they have with them Mort Thomas, who is going to do the utilities and infrastructure of the development. A lot of interest, of course, in this interceptor sewer issue and they will focus on that as well as getting utilities to the site. Tracerics is a well-renowned local historic preservation firm and they will be looking at the impact on the canal with visual resources, the physical and cultural resources. Schnabel Engineering, a very well-known engineering firm will be dealing with the wetlands, the structure in the river, the

hydrology, and all those kinds of things that have been brought to our attention.

We are using the guidelines of the National Park Service, the National Environmental Policy Act, or NEPA, as well as the Council of Environmental Quality. And, of course, the first thing you do when you proceed with the process of environmental assessment of this scale or scope, you need to involve the public in a scoping process and that's what we are doing up through late this afternoon.

That is to get everybody's concerns on the tables and so that when the environmental assessment comes out, people are not frustrated by the fact, well, you didn't answer the question that I've been asking for six months. Those questions will all be answered is the hope. Maybe not to everybody's satisfaction; but, they'll be addressed.

The predictability of when we are going to finish the environmental assessment is something (inaudible). When will you have that assessment out to the public, is always a difficult thing to do. We are looking at, we are call it the spring, which is very dangerous, because spring starts probably in April Fool's Day and extends through Memorial Day. So, I don't mean to be smart about it, but I'm not sure when it will be out. But, certainly spring is what we are looking at, with a decision by mid-summer, we hope, where we are going from there.

As you may not, many are not aware of how we do this. We do an environmental assessment first. Determine the impacts of what we are looking at. Share that with the public and get the public's comments, and then determine whether we are going to proceed with the decision or whether an EIS is necessary. That's the process that we use.

The Park Service has a policy nationwide; that, if you're going to do a job management plan for a park, you will do an environmental impact statement. For instance, if we get the money to do the C & O Canal general management plan, and I guess, does the Commission know that we are not going to be proceeding? I shouldn't give them another item on the agenda.

MR. \_\_\_\_\_: No. Well, we'll talk about it.

MR. PARSONS: Oh, good. I'm sorry; I shouldn't have even mentioned that.

But anyway, we took terrific budget cuts in the area of planning during this next, this fiscal year.

Now, what we have identified the other night were categories of questions. And, I won't go through them all. I'm sure you've seen them before. You can probably read them from there. That is, areas of concern that have been expressed already that were already challenged the consultant to deal with it. And, it was this basis that they went out and retained these other consultants that I spoke about earlier.

The process is described here and here is the spring with the document the public reviewed through the spring and into the summer, with the decision after that.

If there is any questions I can, do you think I covered it enough or should I give more detail?

Chuck?

MR. PASSETT: John, is there a point where you see that it has to go into an entire environmental impact statement process rather than the EEA? Do you, at your level,

intervene and say, "Oh, the heck with this (inaudible) and pass it along (inaudible) EIS (inaudible)?

MR. PARSONS: That would be Kevin and the regional director who would make that decision. And, that would be after the public comment.

MR. PASSETT: Yeah, I'm sure (inaudible). What I'm getting at, I guess, is that this doesn't hang there for prolonged periods of time without doing or saying, well this (inaudible) or it should go on with an EIS or am I making sense (inaudible)?

MR. PARSONS: Oh, absolutely, yes. That's exactly the process.

MR. \_\_\_\_\_: Are there other comments or questions?

MR. PASSETT: That was handled terrifically (inaudible).

MR. PARSONS: Thank you.

MR. PASSETT: Everybody around our table was grateful.

MR. PARSONS: We have had a lot of compliments as well. I think it had to do with the people we selected. We were very careful to check these facilitators.

MR. PASSETT: Yes, very, very careful.

MR. PARSONS: It's a real skill.

MR. PASSETT: Yes, (inaudible).

CHAIRMAN WEIDENFELD: Nancy.

MS. LONG: At my table questions came up about the boathouse on the Virginia shore. Do you have any comments about the Park Service participation at any of those? Or, are they Park Service facilities?

MR. PARSONS: Yes. Specifically, it is a boathouse being proposed by Arlington County. Their boats are located now on the Anacostia River in a constable hut and they have for some time wanted to build a boathouse on the Virginia shore. I think this has been going on approximately for about five years.

They had wanted to build a boathouse at just below Key Bridge right around the corner on Teddy Roosevelt Island (inaudible). And, we took exception to that, we, the Park Service, because they had had difficult access problems for emergency vehicles, deliveries, and things of that nature, and its visual impact on Teddy Roosevelt Island and the park plan. So, we undertook a study, I think three years ago, to look at three sites, that one and actually four sites. Downstream, I'm getting into too much detail now. But, that analysis evaluated three or four other sites.

We then received money from the Congress to do an environmental study of the actual sites. These were preliminary analyses that were done (inaudible). Since that time, we have been working with the county on developing a boathouse on the other side of the parkway. That was the only thing that would be on the river, would be the docks. The people, they would be carrying the boats across the parkway under the bridge.

MS. LONG: (Inaudible).

MR. PARSONS That's the status of it. We are preparing an environmental document and it originally started as an EIS. We are re-evaluating that. We will decide whether that should be an environmental session.

MS. \_\_\_\_\_: How large a facility do we have here?

MR. PARSONS: I don't recall. I do remember it was 52 feet high and it has seven bays in size. They wanted to use it for other purposes than just high school rowing. They want singles, doubles, privately-owned boats (inaudible), much like Thompson's. But, it was about the size of Thompson's, but I shouldn't guess. It was very large.

MR. \_\_\_\_\_: Yes sir, can I ask a question?

MS. \_\_\_\_\_: Yes. (Inaudible)

(Individual speaking, but unable to identify.)

MR. \_\_\_\_\_: John, I just have a quick question. You mentioned the general management plans done on the park and those trigger an EIS.

MR. PARSONS: Yes.

MR. \_\_\_\_\_: Has a general management plan been done on the Georgetown Waterfront Park?

MR. PARSONS: That would be the whole park, the whole C & O Canal Park.

MR. \_\_\_\_\_: I thought, so, I mean it's an administrative entity rather than the Georgetown Waterfront Park is not an administrative entity as part of the Rock Creek Park but a little bit of the C & O Canal (inaudible). So that, you are talking about an administrative entity rather than the subsegment of that like the Waterfront Park.

MR. PARSONS: Correct.

MR. \_\_\_\_\_: And then, so you don't have any plan at the moment to do an overall EIS on the Waterfront Park/non-motorized boating zone.

MR. PARSONS: No.

MR. \_\_\_\_\_: Thank you.

MS. \_\_\_\_\_: (Inaudible).

MR. \_\_\_\_\_: There is no overall plan, I thought there was something stated there. I was hoping that there (inaudible). That means that, presumably, this would be the first one in that area?

MR. \_\_\_\_\_: First.

MR. \_\_\_\_\_: The longest ....

MR. \_\_\_\_\_: This environmental study would be the first one in this generic area that (inaudible) boating? This will be ....

MR. PARSONS: However, the environmental assessment done on this plan here, this was in 1984.

MR. \_\_\_\_\_: But, that has been admitted not to include any boathouse and that's on public record that I have. It was done during the zoning hearing and the (inaudible) doesn't include any boathouse.

MR. PARSONS: Well, I don't know what you mean.

MR. \_\_\_\_\_: Well, how's ....

MR. PARSONS: It was in the plan and the environmental assessment was ....

MR. \_\_\_\_\_: The environmental assessment was done, but based on no building.

MR. \_\_\_\_\_: (Inaudible).

MR. \_\_\_\_\_: So, was this the .....

MR. \_\_\_\_\_: (Inaudible).



MR. \_\_\_\_\_: Oh, okay, I'm sorry. We're talking about this one presumably. And so, with this environmental assessment, that will be the first one in general about a building in this area.

MR. PARSONS: It, ah ....

MR. \_\_\_\_\_: Do I make myself clear?

MR. \_\_\_\_\_: (Inaudible).

MR. \_\_\_\_\_: I mean, this taking place is (simultaneous speaking)

MR. PARSONS: This is the first environment assessment on this structure. Yes.

MR. \_\_\_\_\_: In general for the whole area?

MR. PARSONS: No, on this structure.

MR. \_\_\_\_\_: But, there has been no other adjacent to it?

MR. PARSONS: No, not on ....

MR. \_\_\_\_\_: So, there probably ...

MR. PARSONS: Not on the other structures.

MR. \_\_\_\_\_: So, there has been no cumulative examination ...

MR. PARSONS: Yes, there has.

MR. \_\_\_\_\_: ...of any of the structures in an environment assessment plan?

MR. PARSONS: Okay, I don't know how to answer it.

MR. \_\_\_\_\_: Well, either there is or there isn't. (Inaudible) I think that as, aren't cumulative impacts important to the environment assessment?

MR. PARSONS: Yes.

MR. \_\_\_\_\_: So, this would have to be looked at that issue?

MR. PARSONS: I believe we have looked at that issue already.

MR. \_\_\_\_\_: In what document?

MR. PARSONS: In the environmental assessment of .....

MR. \_\_\_\_\_: It included this boathouse?

MR. PARSONS: It included a boathouse zone.

MR. \_\_\_\_\_: The area where (Inaudible) to.

MR. \_\_\_\_\_: (Inaudible).

MR. \_\_\_\_\_: I'm a little confused (inaudible) ...

MR. PARSONS: The 1984 plan accompanied by an environmental assessment...

MR. \_\_\_\_\_: Yeah, (inaudible due to simultaneous speaking).

MR. PARSONS: ...that dealt with the boathouse zone.

MR. \_\_\_\_\_: Okay, so it goes on (inaudible) ...

MR. PARSONS: Now it's evaluating a specific site within that zone.

MR. \_\_\_\_\_: Not a boathouse, but that didn't include this boathouse because this goes beyond a thousand feet. So, it wasn't a part of that. So, it's not.

MR. PARSONS: It goes maybe a hundred feet beyond....

MR. \_\_\_\_\_: Two-fifty over.

MR. PARSONS: ... the boathouse. I'm not going debate ...

MR. \_\_\_\_\_: (Speaking simultaneously) I'm sorry.

CHAIRMAN WEIDENFELD: Well, let's get on to other specifics. (Inaudible) there is a funny little sound in this room. Is it coming? Anybody got a hearing aid that might be making that sound?

MR. \_\_\_\_\_: (Inaudible) high frequency?

CHAIRMAN WEIDENFELD: That high frequency sound?

MR. \_\_\_\_\_: Can you still hear it? Is it still making it?

MS. LONG: Yeah.

CHAIRMAN WEIDENFELD: It just ....

MR. \_\_\_\_\_: All right. Well, it's not this microphone then.

MR. \_\_\_\_\_: Why don't I turn this off and see if that helps?

MR. \_\_\_\_\_: No, I just turned it off and it .....

MR. \_\_\_\_\_: You shut me off?

Laughter.

CHAIRMAN WEIDENFELD: No. We are not going to do that.

CHAIRMAN WEIDENFELD: All right, let's continue and

MR. \_\_\_\_\_; I have eighteen months of combat.

CHAIRMAN WEIDENFELD: ....anybody, let's just try without it. Let's ignore that.

MS. \_\_\_\_\_: Please let's just go on. I know

(Simultaneous speaking)

MR. \_\_\_\_\_: I think that's it.

MR. \_\_\_\_\_: (Inaudible) drive you crazy.

CHAIRMAN WEIDENFELD: Oh that?

MR. \_\_\_\_\_: It's over here somewhere.

MR. PARSONS: No more questions? We're done.

CHAIRMAN WEIDENFELD: Oh, I'm sure. Anymore questions at the moment or should we, ah. Your, no please continue. Joe, all right.

Laughter.

CHAIRMAN WEIDENFELD: While we scout this room and see what that is ...

MR. \_\_\_\_\_: We have got to get a picture of this. What is the superintendent doing....?

MR. \_\_\_\_\_: He is chasing large game.

CHAIRMAN WEIDENFELD: If we have to get pictures of this .....

Simultaneous speaking.

MR. \_\_\_\_\_: He is displaying proper technique for getting birds off of high gutters.

MR. \_\_\_\_\_: Hey, I don't know what the noise is, but

MR. \_\_\_\_\_: It could be part of that ventilation system up on the roof.

MR. \_\_\_\_\_: I don't hear it either.

MR. \_\_\_\_\_: Are you okay Kevin?

Laughter.

CHAIRMAN WEIDENFELD: Well...

MR. \_\_\_\_\_: Karen is the only one who hears the sound.

CHAIRMAN WEIDENFELD: Now, I think its okay now. So, I just have a small question regarding the process. Is it the consultants that, I mean, how are they going to divvy up all of these questions? At the forefront, are they just being given so many they'll divide all letters, e-mails and then they reduce them? I mean, what how is that going to be coordinated?

MR. PARSONS: Oh, the general consultant, Edall, does all the consolidation and then they give to the specific engineering or historic preservation consultants the specific questions.

CHAIRMAN WEIDENFELD: But, there is redundancy in there. So, I mean that, so everybody gets a certain of letters. They reduce them to whatever, bullets or whatever, and then they put them together and then they put them into categories.

MR. PARSONS: Right, probably these categories and maybe some more and then divvy them by expertise.

CHAIRMAN WEIDENFELD: Okay. So, and that process will then be completed and that's what we get in spring.

MR. PARSONS: Spring.

CHAIRMAN WEIDENFELD: But the determination of whether or not there is an EIS will be made ....

MR. \_\_\_\_\_: Subsequent to that.

CHAIRMAN WEIDENFELD: Subsequent to that, depending upon their, I mean, the outcome of ....

MR. \_\_\_\_\_: Depending upon the public response or reaction to the environment assessment.

CHAIRMAN WEIDENFELD: I see. Okay. So, everything will then be written out in summary form, I guess, or how, I mean, how is it presented? Is it presented in a release? Is it presented by topics ...?

MR. \_\_\_\_\_: In the release it ....

CHAIRMAN WEIDENFELD: ....that answer a Q & A format? The question and then the answer being given and your determination of that. I mean, does the public review the process itself, the question. So, they know why we responded to the question they asked?

MR. \_\_\_\_\_: It's not a question and answer kind of circumstance.

CHAIRMAN WEIDENFELD: Oh, okay.

MR. \_\_\_\_\_: It's, environmental assessments have a pretty set way that we go through it. First, we describe the resources involved. Then you describe the project and then you describe the impact of the project on the resources and how they could be mitigated. Then you study alternatives.

CHAIRMAN WEIDENFELD: But, for those who might believe that they are terribly concerned about a specific issue and they don't see that it is dealt with, I mean that ...

MR. \_\_\_\_\_: Then we have failed.

CHAIRMAN WEIDENFELD: I see.

MR. \_\_\_\_\_: Joe, I think the question in my mind is that the premise, the entire premise of your boathouse is wrong. I'm looking at the C & O Canal National Historic Park more historically. (Inaudible) And, the park was formed with legislation with the intention to protect the land and (inaudible) of these conditions. (Inaudible) .... get routing out the territory of the park they worked for years to try to get rid of in-holdings on the land and still have this problem with the Potomac Boat Club.

MR. \_\_\_\_\_: Where did they build?

MR. \_\_\_\_\_: The building right along the river side of the towpath at the (inaudible). The mission was then that there be no development between the canal and the ... (Someone whispering inaudibly close to the microphone

MR. \_\_\_\_\_: (inaudible) river. It just seems to me that the whole thing of giving for private use a parcel of the C & O Canal National Historic Park is wrong.

MR. \_\_\_\_\_: (Inaudible)

MR. \_\_\_\_\_: I don't think it should happen and it's as if the history of our canal park has been ignored. I mean, the idea of (inaudible) in this process, they took building seriously and concern about the future. They, (inaudible) seem to be concerned green space below the ridge and not concerned about the green space above the Washington (inaudible). And, that's where the, our (inaudible) of undeveloped corridor of the park and attempted to prevent development in that area has just been started. The precedent is a very bad precedent and it needs to (inaudible). It will then encourage others to do the same, to ask, why can't we have a piece of this park?" And this park is extremely vulnerable, extremely vulnerable

to encroachment and constant threats to it. And, this is a major, major invasion into the park. Why, more private industry and the size (inaudible). So, I think the goal (inaudible) of the boathouse is inappropriate. It is faulty. An error, and I think it is inconsistent with the Park Service's obligations to protect park land, and specifically to protect the land where the (inaudible) ends and (inaudible) land. So, I think the Park Service has a point of honor and the protective authority. Are you doing your duty? Ask the defenders and protectors of the park. (Inaudible).

CHAIRMAN WEIDENFELD: That is the question that does weigh on a lot of people, John. So, I wonder if the premise of what's happening is also something that will be dealt with.

MR. \_\_\_\_\_: (Inaudible).

CHAIRMAN WEIDENFELD: ....determine something that has cropped (inaudible) all along the way and especially on the 11<sup>th</sup>. So, it is absolutely ....

MR. \_\_\_\_\_: (Inaudible).

CHAIRMAN WEIDENFELD: I'm sorry.

MR. \_\_\_\_\_: I had a question (inaudible) rather than a statement that maybe John could consider, if he wanted to respond to Carl's statement and to what (inaudible). Would that be okay?

CHAIRMAN WEIDENFELD: But, then that was Carl's (inaudible) ....

MR. \_\_\_\_\_: This is more of a plea for help.

CHAIRMAN WEIDENFELD: Sure.



MR. \_\_\_\_\_: Okay? We're hearing more and more the issue of integrity of the process and unfortunately the people involved being brought up to us. We've heard that in the Commission. We're hearing that now in the public. We've heard it from members of Congress and unfortunately it's growing. So, it's just not your personal integrity. My personal integrity that we have all associated in one way or another. We're associated with it. We've just heard it in one of many challenges to the process being flawed to whether each of us individually, as well as the Commission are doing their job. Both, we're hearing more and more the types of things as well as, I'm sure you're familiar with. They look at this Park Ranger in a uniform with a flat Smokey Bear hat and all that stuff and they look at this individual as the protector of this. But yet, we're constantly have to find ourselves as members of or associated with the Commission. Like I'm sure you have to do all the time. Explaining to the average citizen and sometime congressional staffers why have we gotten the Park Service in the lead? You know, in the most simplest form and I know it's more complicated than that. But, why have we gotten, you know at least what we have we envisioned as our protectors. You know the park and the environment in the lead to build a private, you know, even if it was a state or public, or government school might be a little bit of private institution within the Park Service. And, then that spins off on challenging our personal integrities, our Commission's integrity, and the Park Service integrity. In (inaudible) more and more in that. So, I was wondering if in your response if you were going to say anything to Carl that you could kind of cover that issue with this (inaudible) truth and a number of the Commissioners are having difficulty with that and I'm sure our Ranger out

here on patrol is having difficulty. Wait a minute; we got the fox watching the hen house. The issues of value of lands and those kinds of things. In, you know, is. Let me put it this way. I would hope that as many challenges to the integrity of the process and the roll of the Park Service, that those would be addressed in your answer to the EA and the decision for an EIS. Because I don't imagine that happens in every time, you know, there is an issue. But, clearly in this one, people have called the process, the people, the Commission, you know, all of us in question here. So, if you could help us defend that.

MR. \_\_\_\_\_: Okay.

MR. \_\_\_\_\_. I would appreciate it. Carl, would that go along ....

MR. \_\_\_\_\_: Sure.

MR. \_\_\_\_\_: ....with some of the things that you...

MR. \_\_\_\_\_: .... Yes.

MR. \_\_\_\_\_: ....more of a statement. I'm asking more of a plea for help here.

(People speaking inaudibly off microphone.)

MR. \_\_\_\_\_: I think back over the thirty-three years the Commission has worked with the Park Service and how valuable the partnership has been with this Commission and we have been through a lot of controversies together. A lot of people did not want us to build a parkway (inaudible) to Cumberland. And, it was this Commission who had the luxury, if you will, to listen to the facts and assess the facts and come to the point, in the middle of a major controversy to support the Park Service. I'm not begging for support here. I know there was a lot of trouble around this table by some of your predecessors about supporting

that in Cumberland. And, we have also defended against a lot of those who would do harm to us, such as the Power Plant in Hagerstown. Right, Nancy? Jim? And, that's what we need to have been around this table is an assessment of the facts and we think we are very well (inaudible) to do that. The circumstance we find ourselves in here now is the National Park Service, almost 225 miles of Potomac River shoreline and 13 miles of the Anacostia River. And, people want to get to that river to use it for recreation and we have private parties come to us saying, "We want to build a facility to recreate on the river and for shell racing, whether it is here or on the Anacostia River or in Arlington. We have no authority to lease the Federal land other than for agricultural leasing or historic leasing of historic buildings like we have done (inaudible). So, we have no mechanism to allow people to gain access to the river. Thus, the only mechanism we have is a land exchange. So, we have chosen to use a land exchange here and we are going to be doing it in Arlington and along the Anacostia River. And, people are saying, "Wait a minute. What are you doing?" Just what you said, what are you doing. Well, we are trying to support a sport that has been on this river that has been on this river historically. And, the only mechanism legally to do that is a land exchange, which appears to some as a Federal giveaway. No doubt about it. Whether they were buying us half of downtown Washington in exchange, that's the only mechanism that we have. The other startling example of that is Glenecoe Park, which GSA gave to the brothers that owned that park a major block of real estate in downtown Washington to get Glenecoe Park. A lot of people felt that the public was screwed. Nancy wouldn't agree with that. Land exchanges are very closely examined. I don't like to do them

for the very reason I'm standing here in front of you. People get suspicious. They feel that, if you're giving away something. So, I don't know if that's an answer to you, but I don't think we have the right to refuse people who want use it for recreation. If they were building condominiums, or building something that had nothing to do with our mission, then I would say go away. I do that all the time.

MS. \_\_\_\_\_: John, I don't want to be the devil's advocate, but only because I hear this all the time, and I really don't know how to answer it. I think the about a very interesting answer that you gave on a land exchange, but it doesn't speak to the size and how we were all enshrouded in truth in terms of, I mean literally.

(INAUDIBLE)

.... have no idea that it was, it went to 4,000, then to 25,000 square feet, whatever, and then to 5,000. And then it just got, I have no idea how it got to that. And that it was taken as something that everybody just gracefully accepted. And so, that really isn't the thing that when I hear about the land exchange, but in terms of the secrecy that surrounds this, that's another problem and that has nothing really to do with, I mean, that's a separate issue which those who want to deal with it can, but I still don't know how it got where it got and we didn't know about it and nobody else seemed to know about it and we are doing an NEA based on it. So, how did that happen? Can you answer that so that we can (inaudible) through, some ammunition also?

MR. \_\_\_\_\_: Well, I think what happened is we had a drawing, which we showed this Commission, which was a prospective view taken from underneath Key Bridge. And, it

because of the prospective, the boathouse that was proposed did not look as large as it really was. It was not until we saw that elevation clip print that we then brought to you in July, I believe of 2003, that everybody said, "Oh my goodness, this has gotten a lot bigger than we thought it was." Even though it hadn't changed in size. It still had that same (inaudible) that you had seen in the previous one. We had all seen in the previous prospective view.

MR. \_\_\_\_\_: The same clip print that was in the EA that we saw. (inaudible).

MR. \_\_\_\_\_: No, I'm taking about the ....

MR. \_\_\_\_\_: Okay, well just clarify that so that we don't feel that you told us one thing and you did the other. The document the EA we were basing it on was a much smaller boathouse, right? That we were basing the land exchange on.

MR. \_\_\_\_\_: Well the land exchange was 15,000.

MR. \_\_\_\_\_: Yes.

MR. \_\_\_\_\_: This was actually the image you seen that elevation of three-panel photo (inaudible). You've seen it so many times you don't want to see it again. Ah, was 21,000 (inaudible)?

MR. \_\_\_\_\_: So, that's one of the things she was asking. How did we get there without everybody knowing it? Is that right? All of a sudden, it went from 15 to 21. On whose authority did that happen and what were the decision processes?

MS: \_\_\_\_\_: We were at 21,000 (inaudible).

MR. \_\_\_\_\_: So that we don't feel we were suckered in. Because I think a lot of people feel that now.

MS. \_\_\_\_\_: Association members.

MR. \_\_\_\_\_: Right.

MR. \_\_\_\_\_: I think that is what she is chasing, John.

MR. PARSONS: The boathouse grew in size as the program at the University demanded.

MR. \_\_\_\_\_: But we didn't ....

MR. PARSONS: So, so whether we told you the square footage or not, the drawing you saw was the same one we saw. It wasn't until we saw the larger drawing that the elevation, the 21,000 square foot boathouse, that everybody became startled. That's my recollection. And that boathouse then was reduced for the Zoning Commission to 1900 or 18,900, but it's still not at 15,000. (Inaudible) we showed the prospective view was of the 21,000 square foot boathouse.

MS. \_\_\_\_\_: No, Sheila, just in (inaudible) after that, but did you know that the square footage had changed from the original to that larger size?

MR. \_\_\_\_\_: Yes.

MS. \_\_\_\_\_: Even though the picture was the same? In other words, the picture was the picture, but in terms of it, did you know, we didn't know, but did you know that the size went extra wide.

MR. PARSONS: Yes.

MS. \_\_\_\_\_: Then I guess the question is how come we didn't know? How come we were not informed? As the rules of the game had changed.

MR. PARSONS: I have to look at the tape to see if we told that.

MS. \_\_\_\_\_: I (inaudible) recall actually thinking when I looked at it this is really big and nobody, we didn't take on anything. They were coming back again to see us.

MS. \_\_\_\_\_: (Inaudible)

MS. \_\_\_\_\_: So, we asked, we asked a lot of questions. Everybody was, even with the presentation and everybody was surprised by the size and we expressed that at the time. I vividly remember it.

MR. \_\_\_\_\_: Oh yes. I do too.

MS. \_\_\_\_\_: (Inaudible) wait until the next round and I don't know if we ever had another round.

MR. \_\_\_\_\_: That was summer. (Inaudible)

MS. \_\_\_\_\_: Nancy did you want to comment (inaudible)?

MS. \_\_\_\_\_: A couple of things. Just clarify John, Glenecoe Park is a public use facility and is open to the public. Now, a recurring theme that you will recall, we spoke with you (inaudible) among other things was the question of a private facility on public land. This is a concern, I mean truly in every report that was made on (inaudible). And, I guess that's a very basic kind of question and I believe it (inaudible).

MR. \_\_\_\_\_: The only other options for us, which I think you will agree is probably out of the cards, is for us to build the boathouse and to lease it to the University.

MR. \_\_\_\_\_: Why isn't there the option of just saying no? And, I don't mean that smart ass, but ....

MR. \_\_\_\_\_: I understand.

MR. \_\_\_\_\_: ....in that answer, hey we've got enough problems. We've had enough change. Will we go back and look at our Mission of the Park Service? Would we look at the numbers and volumes of responses and all? At some place, just say, you know, no. We just need to back off of this one. What would drive that? And, again Nancy pointed out, you know the issue that puts all of our integrity on the line beside the EEA and the growth and not knowing (inaudible) and proving it, is the really big issue again of public vs. private, exclusive private. And unfortunately in this case, the school has an extremely great academic reputation, but also a reputation of you know, a "rich kids" school. And of course, we know they give many, many scholarships and all that. But still, the image that we have to deal with and we're building it on a private organization. Do you, I'd encourage you, to be difficult, but Nancy again has pointed that out that the EEA addressed that big time up-front in real factual stuff of how the Park Service, reading the Park Service's Mission in charge. The public defends the building, as Nancy said, of a private institution. Right away says, exclusivity, you know, exclusive, etc., etc. on Park Service land. I would hope you address that big time.

MR. \_\_\_\_\_: We have to.

MR. \_\_\_\_\_: You know, in a very convincing argument and you had mentioned, you know, a decision to go to EIS and, of course, in the scoping you do, and then inform the EEA in the decision and all the things you weigh and balance to do that. And you gave us a



portion of an answer to that, which I thank you for. Can you extend that in relationship to what Nancy said, suggested of, and you never did mention the issue of, "Let's just say no" or say, "Hey we need to rethink this or go somewhere else." Can you deviate? Can you divert that or do you have to go on through the EIS and then not say, "Hey this is just not a good deal for us." And, it may not be a good deal for us image-wise, not environment-wise. In other words, a management decision that the cost of this to our reputation and integrity in the public is too high. Even maybe, if the EIS said, okay, go with it. I mean, when and where would a decision like that come in the process.

MR. \_\_\_\_\_: Well one of the important things of an environmental assessment is a requirement that we evaluate doing nothing, which in this case has (inaudible).

MR. \_\_\_\_\_: Yes, I know they are all supposed to have the zero option.

MR. \_\_\_\_\_: Right. And, and I think that's an important aspect of this environmental assessment. Is that what happens then to the rest of the rowing program on the river, if we say no.

MR. \_\_\_\_\_: That's not a part of the EA, the rest of the environment. We're concerned about the EA is focused on the boathouse.

MR. \_\_\_\_\_: Oh yes, (Inaudible)

MR. \_\_\_\_\_: Should that fairly even be concerned in the decision? Because it's outside the park. At least, Kevin's per view.

MR. \_\_\_\_\_: That's it, yeah, that's the trouble is this park wasn't any bigger.

MR. \_\_\_\_\_: You know, but I mean to me, that's bringing in an unfair joker;

although, I understand that isn't the global thing.

MR. \_\_\_\_\_: Well,

MR. \_\_\_\_\_: It's, you know, it's saying, "Wait, we're going to consider this anyway." In there somewhere, can you and would you in the EIS say, "Hey, just as a management decision, it cost us too much, you know, in public vs. blaming it on an environmental thing? Or, let me flip that around, does the environmental process allow you to make a management decision ...

MR. \_\_\_\_\_: Oh sure.

MR. \_\_\_\_\_: ....if the price is too high in our public image?

MR. \_\_\_\_\_: Absolutely.

MR. \_\_\_\_\_: Okay, okay. I would hope we would pursue this.

CHAIRMAN WEIDENFELD: (Inaudible)

MR. \_\_\_\_\_: Yes, totally. Thanks.

MR. \_\_\_\_\_: I just want to briefly go over where we were and that was the idea that something else that I seem to forget. (inaudible). First of all, I accepted essentially (inaudible), I came on the Commission fourteen years ago, whenever, and now (inaudible) came on. And, that we'd have the probably a 4,000 square foot facility someday (inaudible). And that was there. How it got there, I don't know. Why it was there, I don't know. But, in the mean time, ever since I got on we have been closing people out of the park. We have been forcing people out of the park, private people out of the park construction plan. So, all (inaudible).

One was White's Ferry. We came to an accommodation. I think rightfully so.

They're providing a public service, a little niche of history there too, where you have a ferry going across the (inaudible) River and what happened. But, even they were pulled back on some of their public, their plans on building (inaudible) planned. And, here we have something that's never been built yet and all of a sudden we are going to let it be built for a private, forget the, whether it's a university or a person or what, for a private entity outside the government of the United States, an institution (inaudible) something terrible. It eats on me, it's terrible. And, then to have that being done, that's bad enough. And, I can live with the little one, but then it come in with a big one that's not only big, but it obstructs the view of the tow path. And, one of the big purposes is for the view of the park. We have people who go out here and jog and what have you, but they have the nice environment. And, then the (inaudible) Trail becomes a tunnel between the building and the canal site. And, it just to me is outrageous and that's my perspective and it comes from that we're trying to get people out of the park to a private (inaudible) plan for a few people and then we are encouraging eight groups or eight, in this case, we encouraged eight people to come in. I have no argument with the University versus anything. I have the argument that it's a private thing and that's where I'm coming from. I can't, in my mind, it's just driving me nuts on how I take and mesh the two that we're kicking out, especially the Elkton River people off the land and yet, down here at the beginning almost, we're letting people buy our alliance (inaudible) to get into; however, it's going to work out. And, that's kind of seedy from, looking from the

outside in now that we are going to exchange a 45 foot slice or 300 foot slice on the river. I mean, the difference in evaluation of it may just be a factor of 10 or maybe even more. (Inaudible) buyers, if we wanted to go out on the market and auction that off. I'm sure we could get a hell of a lot more than 300 feet than the 45 foot. That's my whole thing.

(Simultaneous talking.)

MR. \_\_\_\_\_: This is an integrity issue.

MR. \_\_\_\_\_: (Inaudible).

CHAIRMAN WEIDENFELD: Do you have any response to that?

MR. \_\_\_\_\_: All right, I think it's similar to George's point and I'm, obviously I'm not going to satisfy you here today. I should point out that, getting to your issue of

MS. \_\_\_\_\_: (Inaudible whispering) It's my job....

value, that is in that we are restricting this property. It is going to have a scenic easement over it, such as other properties have along the canal, not between the canal and the river, but on the berm side. That it has, its only market value is to somebody who wants to build a boathouse. So, somebody speculated that this thing must be worth a fortune and the appraisers continue to tell us it's not because of what you're doing. You have to be in a position of wanting to build a rowing facility and there isn't a heck of a market for that.

MS. \_\_\_\_\_: But John, to get back to the issue that everybody's raising and you saying, "Okay, we said that 4,000 feet is fine." What we're talking about an entity that has no relevance to, I mean, it's like saying, there has to be a boathouse because I love rowing, which is the comment from the boathouse people, which has nothing to do with the structure

itself and how high it is and its affect upon the area. So, ....

MR. \_\_\_\_\_: You're right, Sheila.

MS. \_\_\_\_\_: ....this disconnect that, you know, I mean, gives (inaudible) disconnect in terms of the lodging of where anything can go.

MR. \_\_\_\_\_: Well, its two completely different issues. If the Park Service proposed to build this structure, then we're down to, is it a tunnel for the Capitol Crescent Trail? Can you see over it? But, if we are having trouble getting past the first issue, which is that private entities shouldn't be allowed to do this (inaudible).

MS. \_\_\_\_\_: Is it the middle issue though?

MR. \_\_\_\_\_: What's the middle issue?

MS. \_\_\_\_\_: The middle one is, why has it gone to where it has gone, if it's okay to have a, I mean, there's still that third issue.

MR. \_\_\_\_\_: (Inaudible).

MS. \_\_\_\_\_: The big jump.

MR. \_\_\_\_\_: Oh, the size?

MS. \_\_\_\_\_: The size.

MR. \_\_\_\_\_: Well, that's exactly what we're going to evaluate.

MS. \_\_\_\_\_: But, the question he has is, why is the Park Service stopped making a fuss about it themselves and allowing the public to express their concern and to, and to, and to challenge the Park Service's integrity on this issue? I mean, that's really ....

MR. \_\_\_\_\_: That's why ....

MS. \_\_\_\_\_: ....the problem that, and there's been no resolution or attempt to try to, for the Park Service to try to explain that site. So, if you want to ....

MR. \_\_\_\_\_: The only mechanism we have to do that is an environmental assessment.

MS. \_\_\_\_\_: No, the mechanism is ....

MR. \_\_\_\_\_: Just to say no.

MS. \_\_\_\_\_: is to say, I mean, is to challenge it and maybe, and to show the public how you got there. But, as a fait accompli, without any ....

MR. \_\_\_\_\_: Give us a chance, will you?

MR. \_\_\_\_\_: Yeah, that's (inaudible)

(Simultaneous talking)

MR. \_\_\_\_\_: I had no idea that you were going to be repeating the last couple of meetings.

MR. \_\_\_\_\_: No and neither did I.

MS. \_\_\_\_\_: (Inaudible).

MR. \_\_\_\_\_: I just, but I just want to, since we're doing it and ....

(Laughter)

MR. \_\_\_\_\_: While we're at anything (inaudible) I'm going to make it work.

MR. \_\_\_\_\_: It's a fine line, it's always the fine line, these exchanges and I know that everything that could be said about this issue has been said, but not everybody said it.

MR. \_\_\_\_\_: Right.

MR. \_\_\_\_\_: So, here you know, so, I'm going to, I got to weigh in too. The very odd, this is a very odd case in terms of the Park (inaudible) the Park Service. It's very, it's an entity that's a very odd case because you've been there forever. We've been there forever and the majority of the Commission has. We go back to 1984, you know, when this whole thing started. One of the wonderful things about these kind of projects is that usually most of the people were there at the beginning or (inaudible) ....

MR. \_\_\_\_\_: Yes.

MR. \_\_\_\_\_: ....by the time they get to this portion (inaudible)

(Laughter)

MR. \_\_\_\_\_: It's (inaudible) at least 21-years.

MR. \_\_\_\_\_: ....on a 4,000 foot boathouse. I mean, come on. You know, that is a, that's a little excessive. But, the thing that is so odd about this is that, all of the players have been here forever, except one, and that's the Superintendent of the Park. We have been through four superintendents in the time. And, what's been puzzling me as this thing has spun further and further out of control is, where's the Superintendent? And, I'm talking about Kevin because in the time period that is really critical, the critical time period is pretty much all for appearance, if you look at it. Because that's when the thing became, you know, larger and than the White House and the spin (inaudible) had been in that period. I guess the question is, everybody's saying, why do you say no? What was the relationship between the Park and the regional office and the private players during those years? Because it's very puzzling. Yeah, you wanted, we could say you wanted a land swap. You know, we can say

that Georgetown wanted the Taj Mahal. The question was, what did the Superintendent want? Because we clearly were not (inaudible). And so, do you have a sense of that or do you get kickback, or do you get push-back from the park? Do you get full collaboration from the park? What was going on back in that period?

MR. \_\_\_\_\_: I guess Doug's main concern was the Capitol Crescent Trail. It was a concern he had stressed that it was that. It was his idea and to build a separate access way to the boathouse and how it's going to work that it is going to be the Capitol Crescent Trail and another different kind of surface that can only be used for access to the boathouse when they need it. What he was convinced that the integrity of the canal berm was okay. I mean, we went down and looked. I mean, he was involved and, of course, we briefed the Commission, I guess, annually because it was moving very slowly. But, ....

MR. \_\_\_\_\_: The size and height, he was onboard as an advocate? Are you ....

MR. \_\_\_\_\_: I would say so. I think we all were until we realized the height of it and because of the bad data we had on the tow path.

MR. \_\_\_\_\_: Could I just make a comment (inaudible) to this? I have memos and (inaudible) Park Service memos from I believe it's Brenda Moore (inaudible) and it says (inaudible) it says, I talked to Superintendent Harris this morning (inaudible) the (inaudible) Bay Key and the (inaudible) property. The following changes are needed based on the Superintendent's concerns (inaudible). The two bases of concerns and the item on the second page says, "The height of (inaudible) boathouse should not be any higher than the existing historic boathouse at Washington Canoe Club. This height should be specified in



this paragraph. So, (inaudible) concern would be on the Capitol Crescent Trail. He specifically asked that the height of the Canoe Club be used the restriction to the height to any boathouse built on this site.

MR. \_\_\_\_\_: Will you provide John, it's unfair to do that to him, and (inaudible) let's get a copy of that? Will you provide him a copy of that?

MR. \_\_\_\_\_: Oh, absolutely. He already got (Inaudible)

MR. \_\_\_\_\_: Oh, he did? Okay, I just, John, I wanted to make sure you weren't getting anybody (inaudible)

MR. \_\_\_\_\_: (Inaudible) your office, I'm sorry. I presented (inaudible) ..

MR. \_\_\_\_\_: (Inaudible)

MS. \_\_\_\_\_: No, actually somebody had sent it to me and I gave it to ....

MS. \_\_\_\_\_: Glen Cary.

MR. \_\_\_\_\_: Who? Glen ....

MS. \_\_\_\_\_: ....and I gave it to ....

(Simultaneous talking)

MS. \_\_\_\_\_: (Inaudible)

MR. \_\_\_\_\_: Carl, I can't hear you, I'm ....

MR. \_\_\_\_\_: I said (inaudible) ....

(Simultaneous speaking)

MR. \_\_\_\_\_: (inaudible) a word for an affliction that, "pleonexia", pleonexia means taking more than your share and it seems to me that once Georgetown got a hold on

this thing, they just kept going and there was not stop. And, I would accuse them of having overreaching, overreaching in a remarkable, dramatic, and egregious way. And, that's what is really thought sometime.

MR. \_\_\_\_\_: But, we are equally, if it were to be judged years down the road to look at us, complacent for at someplace saying ....

MR. \_\_\_\_\_: Yes.

MR. \_\_\_\_\_: .... no, making a management decision to say no. And, we're all going to share that no matter how we feel about it, we're going to share that.

MR. \_\_\_\_\_: (inaudible) go against the legacy.

MR. \_\_\_\_\_: I agree.

MS. \_\_\_\_\_: Yes.

MR. \_\_\_\_\_: Well, I, folks I'm having a real problem with my hearing cause I didn't get a word further than (inaudible) activities (inaudible) without taking part in (inaudible), especially because (inaudible) but, I'm standing over here (inaudible), when someone's sitting right next to me. I want to say a couple of things and try to change the focus and concern. Irrespective of how any of us feel, and I agree with the concern about what is being talked about is an important issue. I think that there's a lot of concern about who said what and what was done and so forth. And, those things are buried in history at this point in time as far as this Commission is concerned. John, you correct me, if I'm wrong, but my understanding over the years and I think (inaudible) national (inaudible) policy act (inaudible).

MR. \_\_\_\_\_: Actually ....

MR. \_\_\_\_\_: Well, it's the citizens' opportunity to be sure that they need Federal action to take into account all of the possible contingencies that would be of concern to the public and for the good. At this point in time, that EIS if it's written will not make the decision as to whether or not the boathouse will be built on (inaudible). Whoever makes that decision will base it on what they see in the environmental impact statement. The advantage to the citizens is, if they don't quite agree with the decision, they have a basis to sue. And, that is to sue on the basis of the environmental impact statement, the decision is not consistent with the environmental impact statement, or that the environmental impact statement is incorrect. The advantage of the scoping process is to make sure that every question that you want addressed, every critical issue is addressed in that environmental impact statement. It seems to me that one of the primary questions that should be raised in the environmental impact statement has to do with the degree of which this plan is compliant with the intent of the (inaudible) down at the National Park and (inaudible) Act. Unless that's in there, then I think you've missed a great opportunity.

This discussion about when we knew and what we know really is irrelevant in terms of defending what eventually takes place. I think it's important that this Commission can be on record of opposing what's proposed and that's fine. That's still just advice to the Secretary. The Secretary, whatever his reasons, may look at the environmental impact statement and say, "Fine, they've addressed the issues and I'm still going to ahead with it or I'm still going to proceed the way I want to." At that point in time, the only defense that the

citizens have or anyone else has is to go through the court system and the court's (inaudible) and think of a value (inaudible).

MR. \_\_\_\_\_: So, I think, I think that to discuss anything other than all of those significant informational (inaudible) as the Department looks at the environmental assessment and the environmental impact statement are just critical and (inaudible) be concerned about them now. And, they have to (inaudible) what (inaudible) ....

Be angry with them, you may not be happy about it. It almost could happen again. But, the point is that it is all history at this point in time. It's not going to do you any good, but some self-satisfaction to say that, "I got you." And, I think that's what (inaudible) I'm just wasting breath. So, as a hope that, I hope the Commission will review the focus on that environmental impact statement. So, I haven't been (inaudible), but I'm half afraid to go on and push the (inaudible) on what's going on. Thank you.

CHAIRMAN WEIDENFELD: Any other comments?

Mr. \_\_\_\_\_: Only just to say to Jim, thank you. That's probably better put than I could have. That's exactly what we're going through.

MR. \_\_\_\_\_: Thank you Jim.

MR. \_\_\_\_\_: I have a couple of statements to make. One of the things that's bothering me is, since I got involved in this thing. Its been going on for two years now, is that all the discussions, the Zoning Commission, and everything else and its been jointly with the Park Service, I've been involved myself, is in terms of rowing. And yet, the C & O Canal Park is not rowers. It's everyone who uses the park, be it hikers, bikers, or whatever

and I haven't seen any discussion of the vast importance at the time about how any of this affects people other than rowers. And, that's really disturbing. Because it affects (inaudible), it's never been addressed. And at this stage, I'm (inaudible) bringing it up. It never gets addressed. If you doubt after the zoning period, we have asked for it.

The other thing is I'm concerned about, and that brings up the related question of particular interest. Is, certainly the Park Service is responsible for looking out for those other users and wouldn't that imply that the Park Service is entitled to look at restrictions to it and not just let this building grow and grow and grow. Because Georgetown says it wants it. In fact, I can tell you we have a court case right now saying they want it, but they didn't say why or prove it. And, isn't that the job of the Park Service to deal exactly with those kinds of issues?

MR. \_\_\_\_\_: (Inaudible)

MR. \_\_\_\_\_: The other point is, is I'm concerned about the process. Because usually, if we get the process really clean, you know, the arguments kind of disappear because we really dealt with the problem. So, since (inaudible) here, we've asked about, for instance, the environmental impact statement focus. It's been reviewed. And, the system reviews it now for all the way up till very recently and the thing that triggers obviously was it came first is the fact that we had to file suit with (inaudible) of the (inaudible). And, we wouldn't probably think that the Park Service would, because it's required by law, ask for an (inaudible) for the (inaudible). And, there hasn't been any. And, you mentioned those (inaudible) in the EA's. Well, those EA's, which are (inaudible) their plan, that mention the

4,000 square foot boathouse. But clearly, a 19,000, 30,500, 33,000 square foot boathouse is totally out of scope for what was the provision in those assessments. And, they are more than five years old. So, if my understanding (inaudible) and (inaudible) is a big (inaudible) would be used as a basis for anything that is carried on forward now. So, we have to go back and revisit the whole thing. And, that really should be addressed properly.

MR. \_\_\_\_\_: There are no alternatives?

MR. \_\_\_\_\_: Was it a good year?

MR. \_\_\_\_\_: Which you would think about now, I mean, certainly the Arlington boathouse has been good.

(Simultaneous talking off microphone)

MR. \_\_\_\_\_: And, there have been any, there's nothing historically binding on this point. So, I think I'll really have to go back to scratch.

MR. \_\_\_\_\_: Lionel, how is that going to happen?

MR. \_\_\_\_\_: Madam Chairwoman, let me just ask you a procedural question.

CHAIRMAN WEIDENFELD: (Inaudible)

MR. \_\_\_\_\_: Being the scoping period has gone up until the end of the day, ....

CHAIRMAN WEIDENFELD: Yeah.

MR. \_\_\_\_\_: .... would it be wise, the answer is probably unwise, but I'll ask the question anyway, that the proceedings of this meeting be included in the documents collected during the scoping period? In other words, the minutes of this ....

MR. \_\_\_\_\_: That would be fine, but the challenge is how do we get this

transcribed in a timely manner?

MR. \_\_\_\_\_: You know, that's the reason ....

CHAIRMAN WEIDENFELD: Well, I guess this ....

(Simultaneous talking)

MR. \_\_\_\_\_: ....there were a lot of issues that are brought up that are public concerns.

(Simultaneous talking)

CHAIRMAN WEIDENFELD: .... a while, just do it, to get done, to get it done in the proper. That, of course, would take the tape and send it to them and then get them a transcription. I mean, its one thing to have it in hand by the (inaudible), which we can copy to just (inaudible).

(Simultaneous talking and coughing)

MR. \_\_\_\_\_: In other words, the raw unedited tape and later it be supplemented with the record supplement.

CHAIRMAN WEIDENFELD: It's a great idea.

MR. \_\_\_\_\_: You know, it's a public meeting, public issues, adding to the scoping, it puts Commission individuals, people, and organizations on record as well as supplementing the process. And, you know, I'd hate to see the whole thing get blown out down in the water, if somebody said, "Well gee Durwood, within that period the Commission had various weaknesses and you and all in it, issues were proposed and you gave answers. You know, like you have and I think some pretty good ones. Gee, why isn't that in the

thing?" Therefore, somebody gets upset; so, include of it, but would that break some traditional precedents for the Commission? I certainly ....

MR. \_\_\_\_\_: I think the ....

MR. \_\_\_\_\_: ....not a student of history, but I would, go ahead.

MR. \_\_\_\_\_: I think the simple answer is yes. I think, I'm glad to see ....

(Simultaneous talking)

CHAIRMAN WEIDENFELD: (Inaudible)

MR. \_\_\_\_\_: I know that from your point of view; but, you know, that obviously the Commission would have to make that decision. But, it's good to know you wouldn't object to a ....

MR. \_\_\_\_\_: I'm glad the meeting isn't next Friday. It's certainly a lot easier to include, we're certainly participating within the window of the scoping process right now. And, technically the transcript probably wouldn't be available for another two weeks. But, we're here. We heard you. It isn't as though you held a private meeting or a public meeting we weren't at.

MR. \_\_\_\_\_: (Speaking simultaneously)

MR. \_\_\_\_\_: So, I don't see any problem with that.

MR. \_\_\_\_\_: Any way, just a suggestion.

CHAIRMAN WEIDENFELD: The citizens believe that all these things have been covered anyway or they can still do it today or is there another way to it. So, but, I just want a response to that.



MR. \_\_\_\_\_: Any way, is there an answer to that, Madam Chairman? Could you let us know? Yes, no, maybe?

(Simultaneous talking)

CHAIRMAN WEIDENFELD: I think that the citizens care ....

(Laughter)

CHAIRMAN WEIDENFELD: ....the (inaudible) those comments have you taken any notes at all?

MR. \_\_\_\_\_: Well, I think we've got the tapes. That's my (inaudible) your suggestion.

CHAIRMAN WEIDENFELD: We have the tapes, but it still has to be finished by, you know, business, the end of business today. You can't send ....

MR. \_\_\_\_\_: No, that's not correct. I mean, Kevin addressed that at the meeting the other night that things can come in later, but they run the risk of not being examined by an exhibitor.

(Simultaneous): Yeah.

MR. \_\_\_\_\_: The way we process things, John, Sally, and I have talked explicitly about this, but you know at some magic hour this afternoon, we are not going to disable the e-mail message. It's just, that at some point, for the staff we are going analyze this stuff. We've got to print it off. And, whether that happens at 5:00 or midnight or Monday morning at 8:00, I don't know because we haven't discussed that. But, (inaudible). Because two weeks from now you can send an e-mail here and at some point we will probably read it, but

it may not be included with the batch of comments that are going to be reviewed and accounted for and though we print them off they came back.

MR. \_\_\_\_\_: What about Gordon's comment that the transcripts from today's meeting could be sent to you a couple weeks from now. Would that be in the time frame that just rules out anyone even looking at them or would those get looked at?

MR. \_\_\_\_\_: Well, I think John's response was, you know, we will accept them and we will get them done as expeditiously as we can. The fact that John, Sally, and I are here listening to this means that we are already sensitized to the comments that are made. If there is anything unique that's made here, (inaudible) we will catch it in the transcripts. My sense is that much more has been said (inaudible) and comments that we heard, but perhaps not explicitly.

MR. \_\_\_\_\_: What we clearly, I'm not sure whether there was an opportunity in the scoping meeting to provide the visions that we have heard here today, both from individuals and the Commission as a whole. I'm not sure whether that would have been in the final EA. Obviously, the minutes of this meeting would reflect that; but, it would also reflect John's openly dealing with Commission questions of integrity that would help us out. Although, you never really did answer because you interrupted you probably, the issue of, you know, give us good arguments why the Park Service is out front on this versus, you know, and so do we look at our traditional protector? Not our giver awayer, you know. But other than that, a number of questions I thought were fairly good answers to these would be on the record too. So, the dialogue with the Commission would be on the record and

Commission questions and positions and some valuable history that may not have appeared in that EA? So, that's where I was going, up to we were (inaudible) issues. New facts. And, Jim Gilford, again reminding the Commission, "Hey folks, this is the way the process works and therefore we need to go ahead and go through with it and really the past history is not that important now. So, for all those things that I don't think we need it with my report (inaudible).

MR. \_\_\_\_\_: Well, we'll endeavor to get the tape transcribed as quickly as possible and include it with the other information and the other copies ....

MR. \_\_\_\_\_: Can we make a placeholder then, a note from you, or a note from Sheila that said, "Hey, I want our minutes to be part of it and as soon as they get translated they will be in, in time." And just verbally to you I'll get enough placeholder for that?

(Laughter)

MR. \_\_\_\_\_: For the record, I think so.

MR. \_\_\_\_\_: Yes, great.

MR. \_\_\_\_\_: I don't think that's appropriate. I think if there's somebody who wants the minutes of this meeting, then the individual should request in writing and have it done today that the minutes of this meeting be enclosed.

MR. \_\_\_\_\_: Not someone from the Commission, but someone from the public who has heard (inaudible). (Inaudible) according to the Commission to get that deeply involved given the functions of the (inaudible) to the (inaudible).

CHAIRMAN WEIDENFELD: But Jim, I do want to respond ....

(Simultaneous talking)

MR. \_\_\_\_\_: Oh, I think they do.

MR. \_\_\_\_\_: It doesn't say they and it does say ....

(Simultaneous talking)

CHAIRMAN WEIDENFELD: It accomplishes and I think that's fine and I'm sure somebody here ....

MR. \_\_\_\_\_: I was trying to leave that door open for the integrity of the Commission and I think John is going to appropriate the job.

CHAIRMAN WEIDENFELD: But, but, I suggest John ....

MR. \_\_\_\_\_: I mean, Jim has got a perfect answer to this ....

MR. \_\_\_\_\_: Another thing, another point that, another point to make is I think it's important that part of the scoping process should include from someone a request that they evaluate this proposal against the intent of the civil (inaudible) department.

MR. \_\_\_\_\_: I understand.

MR. \_\_\_\_\_: I mean, that will start this center thing and the (inaudible) through. If that's not in there, I think we're missing a very good opportunity to have a sound (inaudible).

MR. \_\_\_\_\_: I disagree with that.

CHAIRMAN WEIDENFELD: Yeah, I think that's a very good idea. Just let me respond to what you said about (inaudible) the discussion today. I think it would be valuable because we don't want things like this to slip through our fingers again. I felt really pretty stupid not being able to respond to some people who asked me about the size of the

(inaudible) and I really felt (inaudible). I was on this (inaudible) a while back and my husband even said, "What is wrong with you that you don't know this? How come you aren't top of this?" But, he wasn't the only one who said it, I'll ....

MR. \_\_\_\_\_: Don't you report (inaudible) ....you should let it ....

(Simultaneous talking)

CHAIRMAN WEIDENFELD: Well, that's why we have to discuss it now, if we continue to let things drift through our fingers, what good are we?

MR. \_\_\_\_\_: We need to take the opportunity to advise the Secretary as to the....

CHAIRMAN WEIDENFELD: And, if we don't have the backing .....

(Simultaneous talking)

MR. \_\_\_\_\_: Let's just do it.

CHAIRMAN WEIDENFELD: And, if we don't have the facts right, then we can't evaluate properly and it's coming.

MR. \_\_\_\_\_: Madam Chairman, I think you both are on the same side.

CHAIRMAN WEIDENFELD: Okay, I think we are too. But anyway, I just to, I think today's discussion was valuable enough, I'm not sorry we did it; but I understand your position on that too.

MR. \_\_\_\_\_: Yes. (Inaudible).

CHAIRMAN WEIDENFELD: Let's move on to (inaudible) ....

MR. \_\_\_\_\_: There's been arguments about the size and the height (inaudible). It was not resolved by (inaudible). Well, I-16 (inaudible) this year with the coalition which are

(inaudible) the Park land (inaudible) a balloon at the proper height to show us how high it was. That was the first time it had time it had ever been accurately represented. So, the information is still coming out.

MR. \_\_\_\_\_: I understand that, but that's ....

MR. \_\_\_\_\_: And, I ....

MR. \_\_\_\_\_: ....that I think is, well that's important history and I don't think that's as important as this scoping process.

MR. \_\_\_\_\_: No, but it's important to realize why it's (inaudible).

MR. \_\_\_\_\_: I think I heard Kevin say that we have committed (inaudible). Shouldn't we make a recommendation, I may be wrong. I think that contrary-wise the reason we are committed, we were set-up to make recommendations to the Park Service. And, if that's untrue to or whomever they should go to. I know that I when I came onboard that's what we were told that we were here to make recommendations. If we didn't like something, to tell them. If we liked something, to back it up.

MR. \_\_\_\_\_: (Inaudible).

(Laughter and spontaneous talking)

MR. \_\_\_\_\_: Fine, I guess they should, but ....

MR. \_\_\_\_\_: If I, I think the citizens group will make that request today probably.

CHAIRMAN WEIDENFELD: Okay, I think that ....

MR. \_\_\_\_\_: In writing, right?

CHAIRMAN WEIDENFELD: If anybody else, we do have (inaudible) that actually are part and parcel of the (inaudible) as well. Yes, (inaudible).

MS. \_\_\_\_: One other thing, when this is about process, the EEA process, could we at some point (inaudible) know what the contractors are considering to be studies and (inaudible) in the EA results? Or, do we have to wait until they finish the job and they say, they look at it and say, "wait a minute such and such (inaudible). Is there some way (inaudible) tell what they are doing?

MR. \_\_\_\_: I don't know how we can do that. In other words, when, that's my instant response. Maybe we can re-evaluate it. We are in a very technical process, so Dick and Jim said to litigation. If we were to give some kind of private briefing about what we're doing, I really don't think you're on that side of the process. And, I'm not sure you'd want to be. That is, if it placed you in some kind of a compromised position (inaudible) to have somehow participated privately as an internal member of the Park Service family. That's not your role. I never thought about this before. I don't as you have done with other assessments. Have you, Kevin?

MR. \_\_\_\_: No, and the only examples I can think of in other places where I've worked with the Park Service is where we potentially produced a newsletter that would go out to everybody who has, in this case, commented. But, typically you do that on privates where there might be a year and in some cases between the scoping and development of the draft of the document. But, in this case where we're hoping to give the (inaudible) to this

process in the next several months, I don't think we would put out an intermediate newsletter or as such. And certainly, on the EA's that we produced we haven't done that. Now, as with all the other things that are in here, we should brief you from time-to-time on things, but I don't know, as John said; I'm not sure how that would work on this one. I mean, we would consider it and depending on the kind of comment that we get (inaudible) scoping process, we may find that it's appropriate to do some kind of (inaudible) .....

MS. \_\_\_\_\_: Well, the first document would be the draft.

MR. \_\_\_\_\_: The draft that ....

MS. \_\_\_\_\_: The last point we would be able to say we have considered this (inaudible)....

MR. \_\_\_\_\_: Right.

MR. \_\_\_\_\_: In theory I would think that the Secretary of the Commission is supposed to be advising and has an option to use this organization to ask them to review a draft. She could do that or she could choose not to do that at her peril or demise one way or the other. I mean, if she has a body like this with a history and would require a briefing of the draft or the Executive Summary just as you would someone else. I'm not suggesting she do that, but that I would imagine, if this Commission was asked to review something, it certainly could very (inaudible) no. (Inaudible) is shaking his head.

MR. \_\_\_\_\_: No, no ....

MR. \_\_\_\_\_: No, I'm not talking would she or would she not. I'm talking about there is a tool in her toolbox that she could use to spin and that could be a message right there



and she chose not to use the tool out of her toolbox. Anyway, ....

MR. \_\_\_\_\_: She probably used it to (inaudible) ....

CHAIRMAN WEIDENFELD: One little question about the waterfront, has Mr. (inaudible) accepted? Is the (inaudible) exactly to the (inaudible) or is that (inaudible)? Is everything sort of up in the air now with the (inaudible)?

MR. \_\_\_\_\_: No.

CHAIRMAN WEIDENFELD: No?

MR. \_\_\_\_\_: We are going to start the construction this summer.

CHAIRMAN WEIDENFELD: (Inaudible)

MR. \_\_\_\_\_: The parking lot will be gone.

CHAIRMAN WEIDENFELD: Okay, (inaudible) are there any other (inaudible) questions on this (inaudible)?

(Spontaneous talking)

MS. \_\_\_\_\_: (Inaudible) 12 members of ....

CHAIRMAN WEIDENFELD: Anybody else (inaudible) ....?

MR. \_\_\_\_\_: I'm ready to ....

MR. \_\_\_\_\_: Yes, there's one question that goes to (inaudible) to something that was stated at our (inaudible) meeting that we had after the site visit. At the time, there, we had mentioned that there was this idea of putting a task force together of interested parties to try to hash out what makes sense for this site. In other words, get the process, get more people who are actively involved commenting on this in a room together and that never

happened. And, I was just wondering, I've been involved in a number of things and I've always felt that they were much better than having lawyers swapping briefs back and forth and so is that just not going to happen?

MR. \_\_\_\_\_: I guess it was overtaken by events. In other words, we decided to do an environmental assessment, which is much different and we are also in litigation. So, those two things changed that circumstance.

MR. \_\_\_\_\_: So, that's no longer feasible in the present anyway?

MR. \_\_\_\_\_: Correct.

MR. \_\_\_\_\_: That's a shame.

MR. \_\_\_\_\_: It includes (inaudible) ....

CHAIRMAN WEIDENFELD: (Inaudible) we are going (inaudible) ...

MR. \_\_\_\_\_: Is everybody cold enough now?

(Laughter)

MR. \_\_\_\_\_: I'm shivering up here. I don't know about the rest of you.

MR. \_\_\_\_\_: Maybe I should put my heat on.

MR. \_\_\_\_\_: You've got your stick.

MR. \_\_\_\_\_: Thanks for your comments and the time you gave to this today. We appreciate it.

MR. \_\_\_\_\_: This is the weirdest (inaudible).

MR. \_\_\_\_\_: It didn't work, Kevin?

MR. \_\_\_\_\_: You didn't sweat.

MR. \_\_\_\_\_: He froze it. (Inaudible)

MS. \_\_\_\_\_: That's right.

MS. \_\_\_\_\_: He (inaudible)

MR. \_\_\_\_\_: It's good to see you including a lot of metrics in your presentation, Kevin.

MR. \_\_\_\_\_: What's that (inaudible)

MR. \_\_\_\_\_: That including the metrics in your presentation. Here we always need numbers.

MR. \_\_\_\_\_: (Inaudible).

(Spontaneous talking)

CHAIRMAN WEIDENFELD: Okay, moving on.

MR. \_\_\_\_\_: Okay, can you hear me?

(Spontaneous talking)

MR. \_\_\_\_\_: Shirley (inaudible). Okay. All right. I want thank John and Sally for coming out here this morning and talking to us again about the boathouse.

CHAIRMAN WEIDENFELD: Everybody, quiet please. Thank you, John.

(Spontaneous talking)

MR. \_\_\_\_\_: Well, Kevin is (inaudible)

MR. \_\_\_\_\_: (Inaudible)

(Spontaneous talking about the transcripts off the microphone)

MR. \_\_\_\_\_: I can get you the tape.

(Simultaneous talking)

MR. \_\_\_\_\_: Okay, we're going to take just a five minute break here and what we're going to do is to try and expedite getting your earlier comments into transcriptions, is we're going to take that tape out and going to send it back with John and Sally and they'll start on it this afternoon. And, if we'll just take a five minute break, we can go to the bathroom and we'll come back and we'll talk about the scenic easements. How's that sound?

CHAIRMAN WEIDENFELD: Okay, that sounds fine. Does that mean reviewing at all with the boathouse or does that, we're finished with all that sort of thing.

MR. \_\_\_\_\_: Yeah. That's what I'm assuming. I mean we will have more, more tape. It's just that we're just going to send this one off.

(Sounds like someone trying to disconnect the tape.)

CHAIRMAN WEIDENFELD: Because John and Sally are leaving, I think they ....

MR. \_\_\_\_\_: Okay, we're back to recording now. We're back in session.

MR. \_\_\_\_\_: (Inaudible)

CHAIRMAN WEIDENFELD: and then use the tape (inaudible)

(Simultaneous talking)

MR. \_\_\_\_\_: We're just going out to the hall to talk.

CHAIRMAN WEIDENFELD: Oh, okay (inaudible) in five minutes to (inaudible)

CHAIRMAN WEIDENFELD: Okay, we're. Quiet everyone please. This is lasting a longer than we had planned, but during the break Chuck brought something up and I was (inaudible). Have you been (inaudible)?

MR. \_\_\_\_\_: Yeah.

MR. \_\_\_\_\_: For obvious reasons, hold off until after (inaudible).

CHAIRMAN WEIDENFELD: Okay.

MR. \_\_\_\_\_: Hold off till when?

CHAIRMAN WEIDENFELD: I mean, I (inaudible).

MR. \_\_\_\_\_: Okay, so.

MR. \_\_\_\_\_: (Inaudible)

CHAIRMAN WEIDENFELD: Give him the tape.

MR. \_\_\_\_\_: Okay.

TAPE WAS DISCONNECTED PER THE CHAIRMAN'S INSTRUCTIONS.

#### 4. ADDITIONAL BACKGROUND INFORMATION RECEIVED

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**From:** "Lawrence C. Schuette" <schuette@enews.nrl.navy.mil>  
**To:** Amit Prothi  
**Date:** 1/14/2005 11:44:41 AM  
**Subject:** More background information regarding the GU Boathouse

Hi Amit,

Attached are some files. In reviewing them I see inconsistencies and subtle errors.

1) The WCC is 35' above MEAN SEA LEVEL and 24.5' above the Capital Crescent Trail (not what is listed).

2) We are now in agreement with Congressman Bartlett. A boathouse the size and height of WCC is the maximum size boathouse suitable for the site upstream from WCC - provided it can be shown to not have significant impact on the Canal, the river, or WCC.

v/r  
Larry

---

"Remembering also that timely disbursements to prepare for danger frequently prevent much greater disbursements to repel it" George Washington

Lawrence C. Schuette, Ph.D.                      schuette@nrl.navy.mil  
Code 5707.5                                      (202)767-6814  
Naval Research Laboratory                      (202)767-6767 (fax)

**ROSCOE G. BARTLETT**  
6TH DISTRICT, MARYLAND

2412 RAYBURN HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515  
(202) 225-2721



UNITED STATES  
HOUSE OF REPRESENTATIVES

June 24, 2004

COMMITTEES  
**ARMED SERVICES**  
SUBCOMMITTEES:  
CHAIRMAN  
PROTECTION FORCES  
TERRORISM, UNCONVENTIONAL THREATS  
AND CAPABILITIES

SCIENCE  
SUBCOMMITTEES:  
ENERGY  
SPACE AND AERONAUTICS

SMALL BUSINESS  
VICE CHAIRMAN  
SUBCOMMITTEE:  
REGULATORY REFORM AND OVERSIGHT

Ms. Sally Blumenthal  
Deputy Associate Regional Director  
Lands, Resources, and Planning  
National Capital Region, National Park Service  
1100 Ohio Drive, SW  
Washington, D.C. 20242

Dear Ms. Blumenthal:

I have learned that the National Park Service has reopened the Memorandum of Agreement between the Park Service's Advisory Council on Historic Preservation and the DC State Historic Preservation Office regarding the 106 process for the proposed Georgetown University Boathouse for the purpose of allowing the structure to grow to the size desired by Georgetown University.

I write to go on record against modifying the MOA to allow a structure larger is than is currently approved in the existing MOA. The current MOA allows a structure with a footprint of 15,000 square feet and rising 40 feet above ground. Changing the MOA would allow the potential for an even greater adverse impact on the historic characteristics of the C&O Canal which would be inconsistent with 36 CFR 800, the Section 106 Regulations and appear contradictory to the mission of the National Park Service.

Changes to the MOA to allow a larger structure would further diminish the integrity of the location, design, and the historic feeling and setting of the C&O Canal. The additional impact allowed by the proposed changes to the MOA would introduce visual and atmospheric elements that will diminish the integrity of the C&O Canal's significant historic features and will substantially alter the character of the C&O Canal.

I support recreational opportunities on the Potomac River and in the C&O Canal NHP. I remain convinced that a boathouse on Tract 102-114 is consistent with the mission of the C&O Canal NHP provided it has a roofline below the Towpath of the C&O Canal, and a footprint of no more than 4,000 square feet.



Sally Blumenthal  
June 24, 2004  
Page 2

A boathouse of those proportions would be consistent with the 1986 Development Concept Plan and would be more appropriate for the location. I would support modifying the MOA if it required a structure of 4,000 square feet and a roofline below the C&O Canal Towpath.

Sincerely,

A handwritten signature in black ink, appearing to read "Roscoe G. Bartlett", written over a circular stamp or seal.

ROSCOE G. BARTLETT  
Member of Congress

cc:

Ms. Martha Catlin  
Advisory Council Historic Preservation

Ms. Lisa Burcham  
State Historic Preservation Officer

Ms. Patricia Gallagher  
Executive Director  
National Capital Planning Commission

RGB:dk

**ROSCOE G. BARTLETT**  
6TH DISTRICT, MARYLAND

2412 RAYBURN HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515  
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**UNITED STATES  
HOUSE OF REPRESENTATIVES**

August 18, 2004

**ARMED SERVICES**  
SUBCOMMITTEE:  
**CHAIRMAN**  
PROTECTION FORCES  
TERRORISM, UNCONVENTIONAL THREATS  
AND CAPABILITIES

---

**SCIENCE**  
SUBCOMMITTEES:  
ENERGY  
SPACE AND AERONAUTICS

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**SMALL BUSINESS**  
VICE CHAIRMAN  
SUBCOMMITTEE:  
REGULATORY REFORM AND OVERSIGHT

The Honorable Gale Norton  
Secretary  
United States Department of the Interior  
1849 C Street, NW  
Washington, D.C. 20240

Dear Secretary Norton:

It has come to my attention that the National Park Service intends to enter into a land exchange with Georgetown University for land within the confines of the C&O Canal National Historical Park. The purpose of this land exchange is to allow Georgetown University to build a collegiate boathouse for the University's rowing program and to allow the Park Service to acquire and thereby protect from development an upriver parcel currently owned by Georgetown University.

The C&O Canal National Historical Park is a vital part of our local and national history, as well as a tremendously valuable scenic, environmental and recreational area. I commend the Park Service for its continuing stewardship of this park and protection of the Potomac River.

I must express concern however over the proposed land exchange that will result in the construction of a large boathouse less than a quarter mile from the Key Bridge. Currently this site is undeveloped, and lies in an area that is heavily used by a variety of Park visitors, ranging from parents with baby carriages, joggers, roller bladers, hikers, people walking their dogs, and even commuters on bicycle heading to jobs in the District of Columbia. While I strongly support efforts by the Park Service to continue providing appropriate recreational opportunities in this area, I question whether the proposal under consideration meets that goal. The proposed building will rise 62 feet in height above the river at its highest point, with a dock extending 75 feet into the Potomac River. Only on July 16, 2004 did the NPS reveal that the proposed boathouse stood 9.5 feet above the Canal Towpath for most of its 280 feet of length, with the peak towering 23 feet above the Towpath (13 feet above Canal Road). While FEMA does dictate that the second floor be above the 100 year floodmark, it does not dictate a roofline that is 29 feet above the floodmark. No wonder the C&O Canal Commission was stunned by the size when they toured the proposed site on July 16, 2004.

The process to date has been flawed. A 1995 Environmental Assessment (EA) concerning this land exchange contemplated a structure of approximately 4,000 square feet. Since then, this anticipated structure has expanded into a building five times larger. In April of 2004, the D.C.

□ 7360 GUILFORD DRIVE  
SUITE 101  
FREDERICK, MD 21704  
(301) 694-3030

□ 11377 ROBINWOOD DRIVE  
SUITE F  
HAGERSTOWN, MD 21742  
(301) 797-6043

□ 1 FREDERICK STREET  
SUITE 2  
CUMBERLAND, MD 21502  
(301) 724-2105

□ 15 EAST MAIN STREET  
SUITE 110  
WESTMINSTER, MD 21157  
(410) 857-1115

The Honorable Gale Norton  
August 10, 2004  
Page 2

Zoning Commission approved construction of a boathouse on this site with a footprint of almost 19,000 square feet and a total square footage of approximately 33,000 square feet.

The 1995 EA does not provide adequate analysis of the environmental impacts of such a structure. Accordingly, I request that the Park Service conduct a thorough environmental impact statement (EIS) on this matter before proceeding further with the proposed land exchange. I attach for your consideration in this matter a memorandum provided to me by the Defenders of the Potomac River Parkland explaining their concerns over deficiencies in the 1995 EA.

I further understand that the Park Service is in the process of conducting a full EIS on the possible construction of other boathouses across the Potomac River in Arlington County, Virginia. It would seem reasonable to conclude that if an EIS is needed for boathouses on the Virginia side of the river, it would also be appropriate to conduct an EIS for a boathouse on the opposite shore which would lie within the confines of the C&O Canal National Historical Park.

Additionally, I am aware that the Park Service has reopened the section 106 consultation process pursuant to the National Historic Preservation Act. A Section 106 agreement entered into between the Park Service and the D.C. State Historic Preservation Office in 1998 defined a boathouse of approximately 15,000 square feet with a maximum height of 40 feet for the site in question. It is my understanding that the Park Service officials responsible for the proposed landswap intend to revise this agreement to reflect the structure approved by the D.C. Zoning Commission, i.e. a structure with a maximum height of 51 feet and a total square footage of approximately 33,000 square feet. I believe that a boathouse which faithfully balances the public needs with the private boathouse would be of the size approved by the C&O Canal Commission in 1986 and contemplated in the Environmental Assessment: 4,000 square feet and with a roofline below the towpath, or rising no more than 38.5 feet above the river (Mean Sea Level).

Thank you very much for your attention to this important matter.

Sincerely,



ROSCOE G. BARTLETT  
Member of Congress

RGB:dk

Georgetown University claimed to be building an "average boathouse"  
It's the largest on the East Coast - and absolutely enormous!

Georgetown's Proposal		Year Built or Renovated	Student Body	Total Square Footage	Fraction	Height of Roof Line	Length on Shoreline	Include Rowing Tanks	Seats in Tanks	Distinctly Larger	Similar Size	Distinctly Smaller	Comments
		proposed	6418	33,200	100%	51	280	Yes	20				
1 Boston Univ.	DeWolfe	1999	17,819	20,000	60%	40	125			Yes			Tanks on campus.
2 Brown	Marston	1966	1994	6,029	25,000	75%	40	175	Yes	16			Yes
3 Cornell	Collyer	1957 & 1970s	8,381	21,000	63%	35	160						Yes
4 Columbia	Class of 1929	2001	6,623	10,000	30%	30	75						Yes
5 Dartmouth	Friends	1986	4,047	11,400	34%	30	75						Yes
6 Harvard	Newell	1900	4,843 M	19,000	57%	32	150	Yes	16				Tanks on campus.
6 Harvard	Weld	1906	19,337	20,000	60%	44	180						Shared facility
7 MIT	Pierce	1958	4,258	17,100	52%	22	95'	Yes	8				Yes
8 Northeastern	Henderson	1990	19,588	18,000	54%	35	100						Yes
9 Princeton	Shea	1887 & 2001	4,663	33,500	101%	34	250	Yes	16	Yes			Tanks on campus.
10 Rutgers	Class of 1914	1961	3,717	10,000	30%	24	110						Shared facility
11 Syracuse	TenEyck	1937 & 1988	12,386	15,000	45%	30	100			Yes			Yes
13 Univ. of Penn	Penn	1876	11,686	12,000	36%	30	100						Yes
14 USNA	Fisher	1930	4,172	17,600	53%	36	110	Yes	10				
15 Wisconsin	Crewhouse	2003	29,697	52,000	157%			Yes	16	Yes			Used by more than just Rowers!
16 Yale	Glider	1999	5,286	22,400	67%	30	150						Tanks on campus.

# **Bolded Numbers are per School Website, Architect or Builder of Record**

Others are from measurements, onsite or photogrametric

median boathouse =  
average boathouse =

18,500 square feet  
20,250 square feet

Median East Coast boathouse =  
Average East Coast boathouse =

18,000  
18,133

SHEILA RABB WEIDENFELD  
3059 Q Street NW  
Washington DC 20007  
202.337.1647  
fax: 202.337.2260

May 11, 2004

Ms. Carol J. Mitten  
Chairperson  
D.C. Zoning Commission  
441 4<sup>th</sup> Street NW  
Washington, D.C.

Dear Ms. Mitten:

On April 11, 2004, I received a copy of the May 19, 2003, D.C. Zoning Commission transcript (Case no. 02-31) of the Georgetown University Boathouse. I was totally taken aback by an erroneous comment made by Sally Blumenthal when she stated that the C&O Canal Advisory Commission was in full support of the boathouse as proposed. That is not and has never been the case. To the contrary, the Advisory Commission has never approved it--either its size, design or, in fact, the land exchange itself. In fact, from the beginning, members of the Commission have expressed strong reservations about the location, suggesting that below, rather than above, Key Bridge might be better and have less impact on the national historical park. When I brought the content of the transcript to the attention of the C&O Advisory Commission days later at our April 16 quarterly meeting, it was unanimously moved that as chairman of the Advisory Commission, I write the Zoning Commission "expressing our strong displeasure that our position on the proposed Georgetown Boat House was totally misrepresented at the hearing and that the record be corrected." As a follow-up, I met with Kevin Brandt, Superintendent of the C&O Canal, and John Parsons and Sally Blumenthal of the National Capital Regional Office to determine how and why the Commission was misrepresented. No answers were forthcoming.

As a result, I found it necessary to review the Advisory Commission's meetings, going back more than 20 years, to determine exactly what the commissioners did or did not support. What I found was surprising and disturbing. The subject of the boathouse or its particular site came up for discussion on six occasions. Only last year, at the June 30, 2003, meeting, was a motion ever made regarding the boathouse. At this meeting, John Parsons and Sally Blumenthal presented the proposed boathouse design, with photo-simulations, elevations, and other information. Commissioner Ferial Bishop, representing the District of Columbia, made a motion that the Commission goes on record as being concerned about the size and height of the boathouse. The motion was seconded by Commissioner Emmie Woodward and passed by all members present. This perhaps explains why none of the members of the commission (many of whom have served over 20 years) recall supporting the exchange or boathouse design.

I also reviewed the plans related to the Georgetown waterfront that are referenced in the 1995 Environmental Assessment and Finding of No Significant Impact. While there may be other documents that would increase my understanding of the sequence of events, I doubt they would substantially alter the following underlying points.

First, the 1987 Georgetown Waterfront Plan and the 1989 Special Study on Non-Motorized Boating identify the site of the proposed Georgetown University boathouse as approximately one-half acre in size and intended for a small boathouse of approximately 4,000 square feet.

Second, the 1995 EA and FONSI were based on this plan with the noted exception of the increase from approximately one-half to one acre.

Third, the Memorandum of Agreement with the Advisory Council on Historic Preservation was completed in 1998 limiting the size of the boathouse to a footprint of 15,000 square feet and 40 feet in height.

This may explain why the public was led to believe at the time of the environmental assessment that an approximate 4,000 square foot boathouse would be built on an acre of land no more than 1,100 feet upstream of the Key Bridge. It is, at least, what we on the Commission thought was the case. Perhaps this is why no public comments were received when the document was put out for review.

Considering the above and the level of controversy surrounding the size, height, and location of the boathouse, combined with the misrepresentation of the Commission's position at the May 2003 Zoning Commission hearing, the boathouse will be a key item for discussion at our next Commission meeting in July.

Before the Commission can make an intelligent assessment, we will be inquiring as to:

- How the boathouse grew from 4,000 square feet to nearly 20,000 square feet
- Why the EA/FONSI omitted any reference to any boathouse, much less a greatly expanded boathouse, or why it wasn't then or isn't now necessary to revise or redo the NEPA compliance.
- Why the Commission has been misrepresented as having gone on record as supporting this project when it is quite clear that such is not the case.
- Why concerns for circulation, views, etc. were not addressed in the EA when it was quite clear that the boathouse could have some bearing on these attributes.

In view of these issues, it would be appropriate to suspend all action on the proposed boathouse until the C&O Canal Advisory Commission has an opportunity to discharge its legislated responsibility to review and comment on this matter to the Secretary of the Interior.

Sincerely,

Sheila Rabb Weidenfeld  
Chairman  
C&O Canal Historical Park Advisory Commission

cc: Terry Carlstrom  
John Parsons  
Larry Schuette  
Sally Strain  
Fred Mopsik  
C&O Canal Park Advisory Commissioners

Environmental Assessment for the Proposed Exchange of Properties  
between the National Park Service and Georgetown University within  
the District of Columbia and within the Boundary of Potomac  
Palisades Park within the Chesapeake and Ohio Canal National  
Historical Park

Chesapeake & Ohio Canal National Historical Park  
Washington, D.C.

July 1995

Prepared by: National Capital Area, National Park Service  
and the U.S. Department of the Interior

## I. Overview

This environmental assessment addresses the proposed action of a land exchange involving approximately two acres, between Georgetown University and the Chesapeake and Ohio Canal National Historical Park (C&O Canal NHP), to further National Park Service goals. The National Park Service (NPS), intends to obtain fee interest in the property being acquired from Georgetown University by conveying in exchange fee interest in a Federally owned tract of land within C&O Canal NHP. The property descriptions of the parcels being considered for this land exchange are attached as Appendix A.

The purposes of the proposed exchange are: 1) to allow the National Park Service to acquire and thereby preclude from development, a largely undisturbed inholding featuring mature trees and native vegetation and also prevent the disruption of adjacent parkland, along with preserving a scenic vista of the Potomac River Gorge; 2) consistent with longstanding National Park Service studies and regional planning and in furtherance of the recreational mandate of the C & O Canal NHP Act, provide for placement of a nonmotorized boat facility on property with less developed natural features; and 3) to obtain and thereby extinguish a competing right of access along a length of the National Park Service Capital Crescent Trail, a paved pedestrian-bicycle trail (Capital Crescent Trail).

## Section II. The Proposed Action

The National Park Service and Georgetown University propose to enter into an agreement to exchange parcels of land located within the boundaries of the Chesapeake & Ohio Canal National Historical Park. The properties under consideration are the National Park

Service's parcel, Tract 102-114; and Georgetown University's parcel, Tract 102-109.

This proposal allows the National Park Service to prevent, through acquisition, both the destruction of a mature stand of trees and native vegetation on a privately owned inholding located within the boundaries of C&O Canal NHP and the disturbance of adjacent parkland. This parcel was acquired by Georgetown University as a boathouse site. By obtaining this parcel from Georgetown University, the National Park Service will be able to keep it in its present undeveloped state, and provide protection to its sensitive natural resources.

In exchange for relinquishing this tract of relatively undisturbed land, Georgetown University gains a location in an already developed portion of the waterfront of the Georgetown section of the C & O Canal NHP to place a collegiate boathouse. This proposal does not contemplate a marina (motorized boating) use of this parcel. Georgetown University seeks a better site to serve its rowing and sailing needs. Georgetown University intends to create and maintain an open landscaped setting for the boathouse which will be available to the public. Completion of the rowing structure and its occupancy by Georgetown University will result in space becoming available for use by the public at existing boating facilities presently used by Georgetown University.

In accord with authorities available to the National Park Service at 16 U.S.C. § 4601-22(b)(1988), and 16 U.S.C. § 410y-1(b)(1988), the National Park Service and Georgetown University propose to exchange land interests of approximately equal value. The National Park Service land exchange authority provides that properties to be exchanged must be located in the same state and that be of substantially equal value, or are equalized by the payment of cash.

In this proposed action, both properties are within the District of Columbia. Georgetown University's parcel, Tract 102-109, a lot equalling one acre, is a former CSX railroad property complete with access to the street system of the District of Columbia at the north end of K Street, N.W., and along the length of the former railroad bed now improved as the Capital Crescent Trail. It is, however, encumbered by a use restriction which limits it to use for boathouse purposes and this restriction must be lifted for the exchange to be completed. Tract 102-109 is proposed to be exchanged for Tract 102-114, a one acre vacant lot on Federal property.

Tract 102-114 is approximately 470 feet north of the Old Georgetown Aqueduct Bridge, adjacent to the site of the Washington Canoe Club facility. Beneath the length of Tract 102-114 and along the C & O Canal, the District of Columbia government operates and maintains a sewer facility which services government-owned facilities and several municipal systems.



As a result of covenants to be placed upon the Federally-owned property requiring perpetual use of the property for boathouse purposes by Georgetown University and its successors, the appraised values of the two properties will be approximately equal when exchanged. In consideration of receipt of fee interest in Tract 102-109 and its access rights now owned by Georgetown University, the National Park Service will convey fee interest in Tract 102-114 of the Chesapeake and Ohio Canal National Historical Park.

### Section III. Background

The National Capital Area of the National Park Service manages major portions of the publicly accessible areas of the Potomac River within the District of Columbia. The management of these public areas by the Federal Government has been encouraged throughout the development history of the District of Columbia.

In 1927, plans to establish the Potomac Palisades Park were developed and approved by the National Capital Planning Commission (NCPC) in an effort to protect and preserve the shoreline of the Potomac River north of Georgetown. The National Capital Planning Commission is the Federal government's central planning authority for the metropolitan Washington, D.C. area. NCPC statutory authority is found at 40 U.S.C. § 71a(a)(1)(1988).

The Potomac Palisades Park lies within what is now the boundary of C & O NHP. Consistent with the NCPC plan, the United States eventually acquired large holdings of the Chesapeake and Ohio Canal Company and also from private individuals and corporations. Some of these properties had been developed, such as the parcel that the National Park Service is proposing to provide for the exchange for Georgetown University's more natural tract.

The passage of the Chesapeake & Ohio Canal National Historical Park legislation in 1971 continued the drive to protect this riverfront area. The Act's purpose is "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," 16 U.S.C. § 410y-1(a)(1988). In this proposed land exchange, both parcels of property are located within the boundary of the C & O Canal NHP.

In 1988, in furtherance of the goals set out in the Act, the National Park Service acquired from CSX Railroad, railroad property within the shared boundary of Potomac Palisades Park and the C & O Canal NHP. This parcel extended from the old Washington Aqueduct Bridge to the District of Columbia boundary line. This addition to the C & O Canal NHP, of approximately 34 acres, largely completed the acquisition needed to accomplish this aim of the Act.

Prior to its transaction with the National Park Service, CSX Railroad had conveyed to Georgetown University, Tract 102-109. On

the former railroad bed that runs adjacent to this Georgetown University inholding, the National Park Service recently completed the construction of the Capital Crescent Trail.

Since 1869, there have been boathouses along the Potomac River in the area where the parcel proposed for Georgetown University's boathouse is located. Present-day boathouse facilities in the vicinity include the Washington Canoe Club whose clubhouse is located on parkland and is listed on the National Register of Historic Places. Additionally, the National Park Service has long had boating concessions operations in this section of the Potomac River. Thompson's Boat Center, located at the confluence of Rock Creek with the Potomac River, was developed by the National Park Service in 1960. Another NPS boating concession, Fletcher's Boat House, is located upstream at Canal Road. There are other boating facilities also serving the needs of private clubs, schools, and the general public.

Today much of the land located in this area of the Potomac River Gorge has reverted to a basically natural, if not pristine condition, and is characterized by tree-lined riverbanks and a general absence of structures other than recreational facilities such as boathouses. Virtually all development has been kept outside the topographic edge of the Gorge. The boathouse structure envisioned for Tract 102-114 will be located on the northernmost extension of the building line along the waterfront, consistent with the existing character of the area.

#### Section IV. Need for the Proposal

This proposed land exchange fulfills two goals of the National Park Service for this parkland, in addition to meeting statutory mandates.

First, it provides the National Park Service with one acre of Potomac River shoreline property containing mature, mostly native vegetation located in an area designated to be left undeveloped. By acquiring this parcel, the likelihood of site clearing and construction on this property is virtually eliminated. Due to its location and the accompanying reservation of access, this parcel, Tract 102-109, interrupts the public ownership and potentially interferes with Federal management options within the Potomac Palisades Park area between the prism of the Chesapeake and Ohio Canal and the Potomac River. The former railroad bed adjacent to Georgetown University's inholding now contains the Capital Crescent Trail. So long as Georgetown University owns Tract 102-109, the potential for some development on their land adjacent to this trail exists.

Second, this proposed land exchange makes available for boathouse

use, a site recommended for this purpose in prior regional and NPS studies and plans, and furthers the recreational mandate of the C & O Canal NHP Act.

The parcel proposed by the National Park Service for exchange with Georgetown University for placement of a boathouse, Tract 102-114, is a site previously identified for boathouse use in National Park Service studies. One of these studies, the 1987 cooperative plan produced by the National Park Service, the District of Columbia, interested groups, and the National Capital Planning Commission, Plan for the Georgetown Waterfront Park and the C & O Canal National Historical Park, as approved by the NCPC and the Fine Arts Commission, recommends that the area where Georgetown University's parcel is located be protected from further development.

The 1989 National Park Service Special Study, Nonmotorized Boating In The Potomac and Anacostia Rivers -- Washington, D.C., Preliminary Report, January 1989, quotes from this 1987 plan. It states:

The [1987] [bracketed language in quoted text] plan designates a general area of land and water within which new boathouses are appropriate (zone 14).

~~Boathouses does not extend beyond the area designated as zone 14 because of the policy of the National Park Service to preserve the natural conditions of the Palisades.~~

Preserve Natural Scenic Values of Palisades: Above Key Bridge, west of the boundary of the designated boathouse area, the natural conditions of the Palisades will be preserved. The Potomac River above Key Bridge is one of the main scenic treasures of the nation's capital, and no new development will be permitted here. In areas not now adequately protected, particularly the south edge of the Georgetown University campus, attempts will be made to acquire scenic easements and other devices to prevent intrusive developments.

Pages 6-7, NPS Special Study, Nonmotorized Boating In The Potomac and Anacostia Rivers -- Washington, D.C., Preliminary Report, January 1989. This report is Appendix B.

This 1987 plan builds on earlier regional proposals. In 1984, the National Capital Planning Commission identified the need for additional nonmotorized boating facilities in the vicinity of Francis Scott Key Bridge at Georgetown. The Georgetown Waterfront Park plan approved that year by the National Capital Planning

Commission contained as an element of this plan, the development of these nonmotorized boating facilities.

Studies conducted by the National Park Service reflect increasing public interest in nonmotorized boating as a recreational activity. Demand for rowing facilities in particular continues to grow in the metropolitan Washington, D.C. area. In 1989, the National Park Service concluded "rowing activities in the [Washington, D.C.] metropolitan area have doubled, with high school and college team activity up 60 percent in three years." National Park Service special study, Nonmotorized Boating in the Potomac and Anacostia Rivers- Washington, D.C., Preliminary Report, January 1989. There is no indication that this trend has reversed.

This increased demand has made existing facilities inadequate to serve these boating needs. In the January 1985 National Park Service report, Survey of Non-motorized Boating Activities along the Georgetown Waterfront, eighteen local rowing or boating groups were contacted and at that time many of these groups had waiting lists of individuals seeking to become members. This report is Appendix C.

Georgetown University currently rents two bays (storage compartments) of the Thompson's Boat Center for the storage of seventeen 57-foot shells; six 44-foot shells; eight 32-foot shells; and five 26-foot shells. There is every indication that this space, if vacated by Georgetown University, will be quickly filled with watercraft from other programs, groups, and individuals.

#### Section V. Description of the Environment and Potential Impacts

A. Legal descriptions for both properties are in Appendix A.

B. Tract 102-109, Georgetown University's parcel which the National Park Service seeks to acquire:

This land contains a combination of mature and second growth riverine vegetative habitat and contains a high-grade wetland. The majority of species on this tract are indigenous to the Potomac River Watershed and the District of Columbia. Wildlife species include a variety of small mammals including muskrat, beaver, rabbit and raccoon, with a population of native songbirds and waterfowl.

This tract is located within the Potomac Palisades area which is currently being inventoried for vegetation species. Over 300 individual plant species have already been identified in this location, with over 60 of these species being of special interest to authorities even if not listed as rare, threatened or endangered.

The clearing or modification and development of such an established woodland site increases the potential for storm water runoff and soil sedimentation into the Potomac River and ultimately the Chesapeake Bay. Construction activities or even increased recreation on this tract will impact the natural resources and degrade existing natural resources.

C. Tract 102-114, National Park Service parcel which the National Park Service proposes be exchanged for use by Georgetown University as a boathouse site:

This land has been continuously impacted by human development and use. The vegetation present on this tract is nonnative. It is predominantly an edge-type habitat, consisting of alien and invasive nonnative species typically found in previously cleared urban areas. Wildlife at this location consists of populations of small mammals such as rabbit, squirrel and raccoon which are present at a limited level.

No existing or potential cultural resources have been identified as occurring on this tract. The area had been surveyed as part of the development of the Capital Crescent Trail. That survey, coupled with the construction during 1962-1963 of the Dulles Interceptor sewer, indicates that the likelihood of any archeological resources meeting the National Register's criteria of significance is remote. However, in the event that any subsurface artifacts were disturbed during any activities associated with this proposed land exchange, they will be appropriately recorded pursuant to National Park Service policy. As a result of past construction and other activities on Tract 102-114, however, no artifacts are expected to be encountered on this site.

Soil compaction from the use of the site as a parking area has increased the likelihood of the occurrence of storm water runoff and soil sedimentation into the Potomac River.

Beneath the length of Tract 102-114 and along the C & O Canal, the District of Columbia government operates and maintains a sewer facility which services government-owned facilities and several municipal systems.

Pursuant to NPS guidelines, in May 1995, the National Park Service completed a wetlands delineation on this parcel. Sewerline construction and water seepage from the Canal have combined to create conditions that qualify this tract as a wetland. On concluding that wetland indicators were present, the U.S. Army Corps of Engineers (Corps) was contacted. In June 1995, the Corps met with the National Park Service and Georgetown University and inspected Tract 102-114. Based on this examination, the Corps will work with the National Park Service, should wetlands mitigation be necessary.

Section VI. Alternatives to the proposed land exchange and associated environmental impacts

Alternative A. No action

Under this alternative, the National Park Service parcel, Tract 102-114, may be used for occasional permitted urban uses and by fishermen. Parking of vehicles, trespasses, and continuing degradation to the natural resources through both permissible and unpermitted uses is likely.

Under this alternative, the Georgetown University parcel, 102-109, will likely be proposed by Georgetown University for development as a boathouse or other collegiate recreational facility. Should Georgetown University develop the property, in addition to having an adverse impact on the native flora and fauna on its tract, the resources of the surrounding parkland will be negatively affected.

Georgetown University also retains its right to legitimately use vehicles on the Capital Crescent Trail to reach their inholding, thereby disrupting visitor use and enjoyment of the Trail.

Alternative B. National Park Service placement of boathouse on its tract

Under this alternative, if the National Park Service developed its parcel as a recreational boathouse without acquiring Georgetown University's parcel in an accompanying land exchange, the unpermitted recreational use of the National Park Service tract will decrease as the parcel becomes developed. This development could be accomplished by either the National Park Service through appropriated funds, or as a concessioner opportunity.

Georgetown University, however, will still be able to develop their upstream property in contradiction of recommendations to preserve the natural character of the area. A structure on Tract 102-109 could interfere with the current natural vista of the Potomac River Gorge. Activities on the Georgetown University tract will also affect the surrounding parkland. Additionally, Georgetown University will retain its right to legitimately use vehicles on the Capital Crescent Trail to reach its inholding, thereby disrupting visitor use and enjoyment of the Trail.

This alternative could result in construction of two boathouses in this area of C & O Canal NHP, instead of one.

VII. Impact and Benefits of Proposal

This proposed exchange does not change the boundary of either the Potomac Palisades Park or the Chesapeake and Ohio Canal National

Historical Park. If Tract 102-109 is acquired, access along the Capital Crescent Trail will be restricted to that length of trail north of the Aqueduct bridge to Tract 102-114. In this portion of the Trail, access will be controlled to delivery of boats, equipment and supplies to the boathouse and public safety vehicles. Some widening of the paved trail may be required to accommodate coincidental movement of boathouse and other recreational traffic.

Acquiring Georgetown University's parcel will preclude its development as a recreation facility and the accompanying disturbance of parkland adjoining this inholding. It will protect the existing scenic vista of the Potomac River Gorge. This tract contains mature native vegetation. Preserving the natural condition of this property conforms with longterm planning for this area of C & O NHP. This exchange will continue the current passive use of this property.

The tract that the National Park Service is considering for placement of a boathouse by Georgetown University is already used for both permitted and unpermitted recreational activities. It is located next to a boathouse with an active boat club and a large membership. For decades, boating-related activities have occurred on this parcel of land. A major portion of this tract has been formally used by this boat club occupying the neighboring site.

Most of this parcel is open space, with a fringe of nonnative and invasive trees and alien vegetation around its perimeter. It has also been a staging site for various construction projects over the years. Litter which regularly accumulates on this parcel is of a type associated with tailgate parties and camping. This exchange may lead to the construction of a boathouse on this property. If this is the case, the tract will no longer be used for activities and parking which are unrelated to nonmotorized recreational boating.

Another benefit of this proposed exchange is that as Georgetown University vacates commercial boathouse space upon completion of its boathouse, additional rowing facilities will become available to the general public and for organized rowing groups.

#### VIII. Consultation and Coordination and Public Involvement

The National Park Service is complying with applicable statutes and regulatory requirements in considering this action, which include:

NPS Land Exchange Guidelines as revised February 16, 1995. This process provides for public notification.

This land exchange proposal is also being evaluated pursuant to National Park Service policy, consistent with Executive Order No. 11988, 3 C.F.R. 1977 Comp., p. 117, Floodplain Management; and

Executive Order No. 11990, 3 C.F.R. Comp., p. 121, Protection of Wetlands. The U.S. Army Corps of Engineers has been consulted.

The District of Columbia State Historic Preservation Officer has been consulted. C & O Canal NHP is a historic property, and the Washington Canoe Club, which is listed in the National Register of Historic Places, is on Federal property adjacent to the exchange parcel proposed for the boathouse.

Conditions precedent to any development, should this exchange be completed, include approval by the appropriate regional planning agencies pursuant to applicable law, including 40 U.S.C. § 71 (1988). In particular, the Commission of Fine Arts and the NCPC must approve the design of the boathouse.

This environmental assessment was drafted notwithstanding that land exchanges not leading to significant changes in the use of the land are generally excluded from this NEPA requirement under the Departmental Manual provision on Categorical Exclusions to the National Environmental Policy Act of 1969, 42 U.S.C. § 4321 et. seq. (1988), (NEPA), for actions related to development, 516 DM 6 Appendix 7.4 (C)(2).

The terms of this proposed land exchange are also shaped by the prior studies performed by the National Park Service and other entities on the subject of boathouses for metropolitan Washington, D.C. The studies, in large part, are based upon the comments of public and private entities and those of the general public. Nonetheless, the National Park Service actively seeks public comment on this Environmental Assessment. Pursuant to National Park Service policy and consistent with Executive Order No. 11988, Sec. 2(a)(4), 3 C.F.R. 1977 Comp., p. 117; and Executive Order No. 11990, Sec. 2(b), 3 C.F.R. Comp., p. 121, written comments will be considered if delivered by or postmarked no later than August 21, 1995.

Written comments should be directed to: Mr. Robert Stanton; Field Director; National Capital Area; 1100 Ohio Drive SW; Washington, D.C. 20242. Copies of the Environmental Assessment may be reviewed or obtained by contacting Mr. Glenn DeMarr of the Office of Stewardship and Partnerships located at the above address or by telephone at (202) 619-7027

#### IX. List of Appendices

Appendix A      Legal descriptions of Tracts 102-114, and 102-109.

Appendix B      NPS Special Study, Nonmotorized Boating In The Potomac and Anacostia Rivers -- Washington, D.C., Preliminary Report, January 1989.



Appendix C      NPS Report, Denver Service Center Survey of Non-  
motorized Boating Activities along the Georgetown Waterfront,  
January 1985

X.    Other References

Flora and Fauna Reports for Chesapeake and Ohio Canal National  
Historical Park, May 13, 1994, as prepared by the National  
Biological Survey.

XI.   List of Agencies Consulted

U.S. Army Corps of Engineers, Baltimore District

District of Columbia State Historic Preservation Officer

The attached file contains the meeting notes showing Superintendent Doug Faris's requested changes of 4/9/1996 to the Exchange Agreement between GU and NPS.

In particular note that on the second page Superintendent Faris requests that the proposed boathouse building be at, or below the height of Washington Canoe Club. Washington Canoe Club is 24 feet 6 inches above the Capital Crescent Trail. The Exchange Agreement allows for a Boathouse that is up to 58 feet above the Capital Crescent Trail.

Obviously the Superintendent of the Park was overruled.

## COMMENTS ON GEORGETOWN UNIVERSITY LAND EXCHANGE

Glenn, I talked with Superintendent Faris this morning (April 9) regarding wording for the Quitclaim Deed and the Preliminary Agreement To Exchange Real Property. The following changes are needed based on the Superintendent's concerns.

**Quitclaim Deed:****New inclusion re. open space language**

line 4 - insert "collegiate" before "recreational boating".  
This is requested as a result of concerns of our advisory commission that the boat house will be used by alumni and university friends and not strictly as a "boathouse for students" as was stated in the FONSI.

Language needs to define what can be stored: "only university boats" and kind and quantity of fuel to be stored. Are we talking of propane or fuel oil for the building or are we talking about boat motor fuel and if so how much fuel do they need for chase boats? 50 gallons? Also storage area is limited to 1500 sq. ft.

**New inclusion re. ingress and egress.**

The Superintendent is adamant that due to the sensitivity of the Capital Crescent Trail and its supports that the trail from the end of K Street to where ever the University accesses their boathouse be widened at their expense to the full 15 feet wide right of way so that bicycles can have an unobstructed trail. There is no way that a vehicle with or without a boat trailer can be on the trail in its present width without obstructing it.

Also the trail that will be used by vehicles such as DC firetrucks and construction vehicles needs to be reinforced to support that kind of weight. We need to get an engineer to assess the trail and develop specs to accommodate these heavier loads so that GU will know how much they will need to do before construct can begin.

Add sentence to restrict delivery of construction materials and equipment to after dark to minimize impact to trail users.

Modify second paragraph to state that the repairs made by the university to the CCT are to conform to NPS specifications.

Last paragraph: need to reemphasize that only temporary parking is permitted at the boathouse site itself.

**Other Quitclaim Comments**

- pg 3. Add "collegiate" in line 3 before "recreational"
- pg 6. Add "collegiate" in item 1. before "boating"

- What does "ancillary recreational" include in item 1.7
- pg 7. Same two comments as for pg 6. above for two places in first paragraph
- pg 8. First paragraph, section (b), the height of the GU boathouse should not be and higher than the existing historic boathouse of Washington Canoe Club. This height should be specified in this paragraph.
- pg 9. First paragraph: Add "university" before "shell storage", and also before "sailing equipment".  
First paragraph: section (m) replace with "temporary parking for loading and unloading vehicles"  
First paragraph: Add "collegiate" before "boathouse" in the eleventh line.

#### Preliminary Agreement to Exchange Real Property

- pg 2. Section (1) Add "collegiate" before "recreational"
- pg 6. Line 6. "two days" is too short unless they already can provide us with a testing plan specifying how they will be testing, how heavy the equipment will be, impact on CCT use, etc. We should state "within 10 working days after receiving an acceptable work plan from the University's environmental consultants".  
Line 8. Add "and/or to the Capital Crescent Trail" after "Tract 102-114"
- pg 8. Line 1. Add "collegiate" after "non-motorized"  
Line 2. Define "ancillary" and add "collegiate" before "recreational"
- pg 9. First paragraph, section B. and section (iv) should read the same as comments for pages 8 and 9 of the Quitclaim Deed above.  
Section (iv) Add "collegiate" before "program"
- pg 10 Add "collegiate" before "boathouse"
- pg 13 Section (16), Line 10 Add "collegiate" before "boating"
- pg 15 Why are we reimbursing the University under item (20) since this is mutually beneficial to both of us.

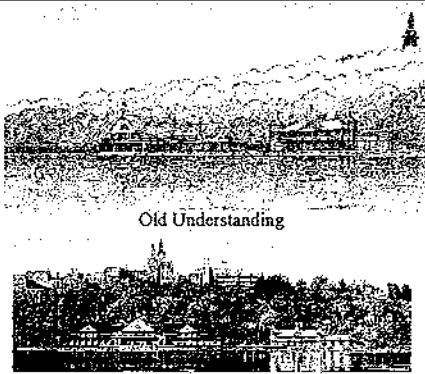
Testimony for Case 02-30

Larry Schuette  
Washington Canoe Club  
PO BOX 25449  
Washington DC, 20007

## Georgetown Boathouse

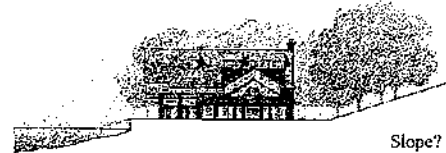


2



New Understanding

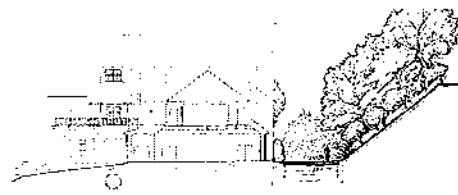
3



Old Understanding

Slope?  
C&O Canal?  
CCT?

4



Strongly oppose granting the 15' variance as it will visually block the view from WCC upstream.

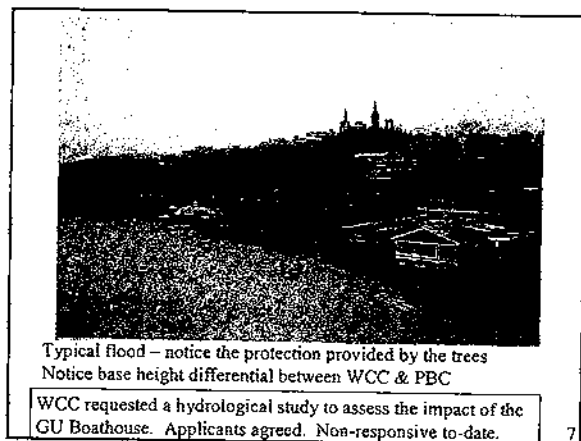
Suggest making it at least 35' from river.

Advantages:

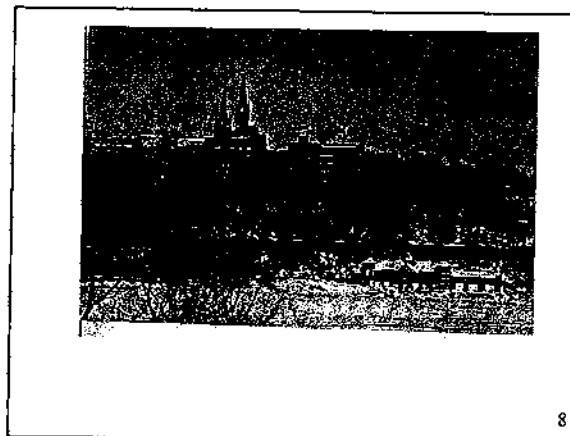
- Provide consistency with Thompson's Boathouse and WCC.
- Would solve the GU permanent pier/ramp issue by giving them more room on land to bring the shells out during a flood.
- Would reduce the length of the ramp, pulling the dock in closer to shore.



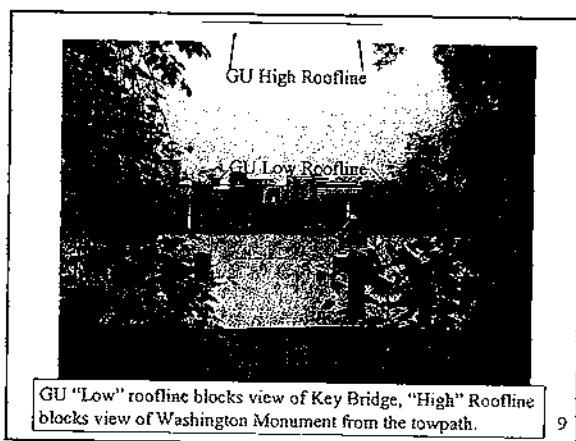
6



7



8



9

GU's "Average Boathouse" is not for the Potomac...


GU Boathouse: 11,500 ft<sup>2</sup> of boat storage, 33,500 ft<sup>2</sup> total floor space  
WCC: 5,000 ft<sup>2</sup> of storage, 9100 ft<sup>2</sup> total (27% the size of GU)

*From the National Park Service, "Facility and Site Analysis for a Boathouse on the Potomac River in Arlington County," Report*

- Proposed Arlington County Boathouse: 13,500 ft<sup>2</sup> of storage, 25,000 ft<sup>2</sup> of total space (75% the size of GU)  
indoor storage for 132 rowing shells
- Alexandria Boathouse: 9,500 ft<sup>2</sup> of storage, 12,750 ft<sup>2</sup> total (38% the size of GU)  
-TC Williams – over two hundred students, 3 bays, one for storage, one for men and one for women (8 women crews alone)
- Sandy Run, Occoquan: 7,000 ft<sup>2</sup> of storage, 7,250 total (22% the size of GU)  
indoor storage for 175 rowing shells
- Thompson Boat Center: 12,400 ft<sup>2</sup> of storage, 17,000 ft<sup>2</sup> total (50% the size of GU)  
200' overall, 60' and 80' deep. 1800 high school students, 2 Universities
- PBC: 5100 ft<sup>2</sup> of storage, 10,000 ft<sup>2</sup> total (29% the size of GU)

10

GU's "Average Boathouse" is not average for the EARC...

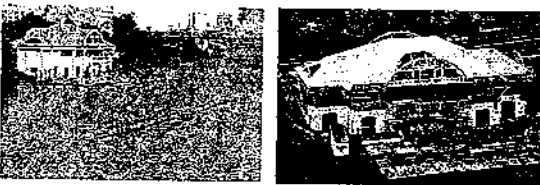


Dartmouth College, EARC Member

3 Bays – 30 shells  
small dock, low roofline

16 person tank and ergs – on campus  
"most popular sport at school"

11



Boston University, EARC Member

125' wide, 70' deep, 40' high  
20,000 ft<sup>2</sup> (per press release) – 58% of GU

17,800 undergraduates  
16 person rowing tank on campus

12

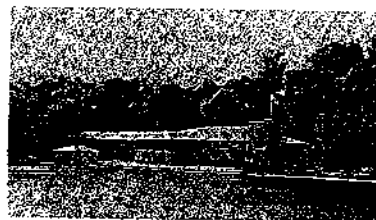


North Eastern University, EARC Member

100' wide, 75' deep, 45' high  
15,000 ft<sup>2</sup> (45% of Georgetown)

19,600 undergraduates  
Rowing tank on campus  
Known as "Gargantuan" in Boston

13



Princeton University, EARC Member  
20,000 ft<sup>2</sup> original building, 13,000 ft<sup>2</sup> addition in 2000  
Currently the largest rowing facility on the East Coast  
16 person tank, ergs in boathouse

40' rooftop  
7 Boat bays  
"Gateway to the University"  
"It is enormous" - but smaller than the proposed Georgetown Boathouse

And is the US National Team Training Center - 50 to 75 National Team members train there every day. Two Boat bays are for National Team members only

14

#### Summary

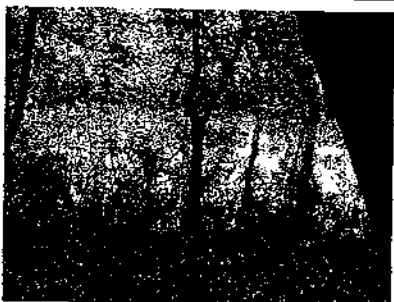
- GU's proposed Boathouse was billed as average, it is at least 50% larger than average.
- The boathouse repeatedly presented by GU as being similar in size and scope of program which appears to be the largest on the East Coast also houses the US National Team.
- Tanks and Ergometers are not river dependent uses - GU Gymnasium and Stadium are slated for expansion, they could be placed there.
- Ceiling height of first floor can be reduced by 2' minimum. Univ. of Penn. uses a pit for the Oars to do others.
- No known programmatic reason for 40' high ceiling in second floor exercise room.
- Boat Bays could be 65' long. Many Universities don't use "end of bay storage"
- WCC very concerned about impact of Boathouse on WCC during construction, during operation and during flood. Potential damage could include total destruction of WCC Boathouse.
- Believe there are many reasons to reject the design from a visual impact and recreational opportunities perspective.

#### What To Do?

- Recommend moving the boathouse downstream of WCC due to the potential damage during flood to WCC, and reduce the visual and recreational opportunities impact to WCC, the C&O Canal and CCT.
- GU should design and build a Boathouse that is truly in keeping with the size of existing boathouses on the Potomac in consideration of the C & O Canal, the waterfront and the Potomac River George.
- When GU does build, we request the opportunity to provide suggestions for Zoning Orders

15

#### Backup Slides



Old Understanding - "GU stands ready to build a 35K ft<sup>2</sup> Boathouse upstream"

New Understanding - The upstream site - 45' wide, 1000' long and underwater...  
The 35,500 ft<sup>2</sup> boathouse would be 32' wide, 600' long

GU tank on campus, 30K ft<sup>2</sup>  
Brown no tank  
Columbia good site, no tank, SU site  
Yale tank on campus  
Cornell tank on campus  
Princeton tank in boathouse - previously 20K ft<sup>2</sup>, now 30K ft<sup>2</sup>,  
Two Bays are for the US National Team only - National Team  
Yale rowing Center - 50-75 rowers  
"Original rowing in the old ways..."  
Dartmouth very small, no tank  
Pittsburgh small - shared with rugby, no tank  
Northwestern 15K ft<sup>2</sup>, "hockey rink - gargantuan"  
Stanford  
Naval Academy out  
Harvard no tank, very good site boathouse -  
UPenn 70K ft<sup>2</sup>, no tank, 2 bays, 1 repair and storage bay 2 locker  
rooms, hole in floor  
Washington  
Vassar/Colby - 100 K ft<sup>2</sup>, no tank, some 3rd story

On water in February - off in December (1 month a year), no need for a tank

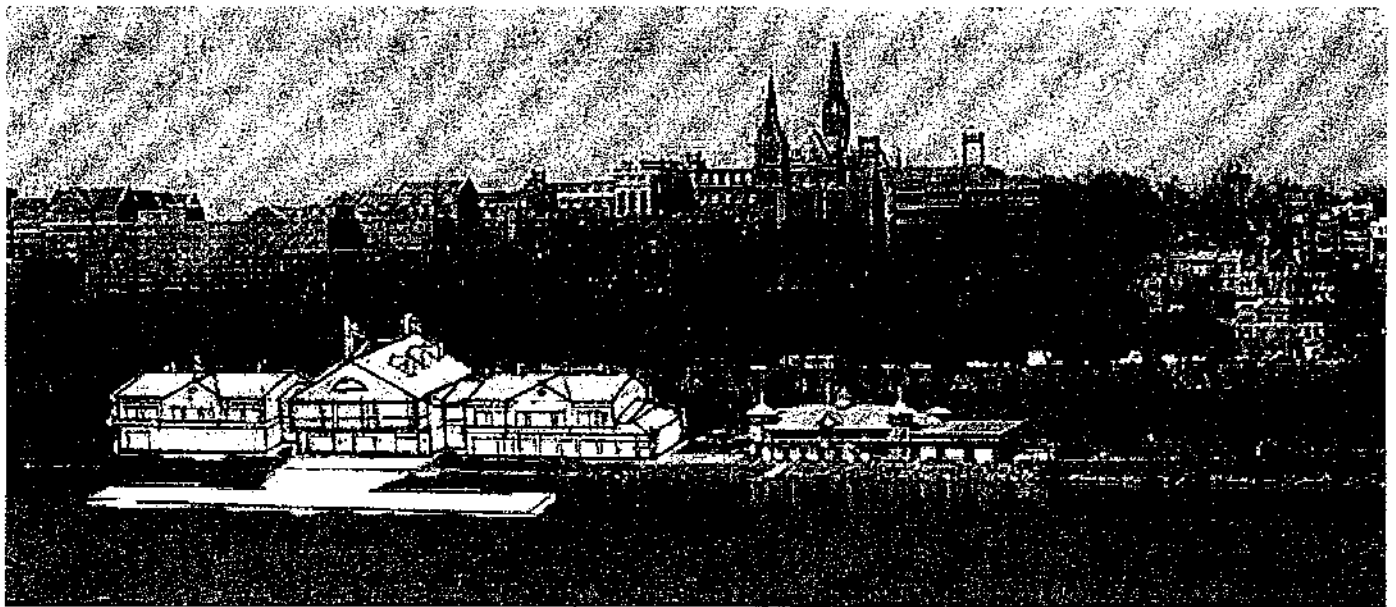
"Trust me - Culture of rowing requires the utilization of space!

Boathouse-building frenzy!"

Made the small, and more of them - Boat storage - dependent use of the river!







Hon. Gale Norton  
Secretary of the Interior  
1849 C Street, N.W.  
Washington, DC 20240

I am writing to call your attention to a National Park Service (NPS) proposal that deeply concerns me. The NPS National Capital Region proposes a land swap within the C&O Canal National Historical Park to allow Georgetown University to construct a private boathouse.

The NPS is moving forward with this proposal without regard to the public interest or legal requirements, as detailed below.

1) The National Park Service, in its founding legislation of 1916, is charged with conserving "the scenery and natural and historic objects and the wild life in the parks and to provide for the enjoyment of same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

The proposal threatens, rather than conserves, the park's natural, historic, cultural, recreational, and scenic assets. Removing a large section of those assets from public use sets a disturbing precedent and impairs the enjoyment of future generations.

2) The National Environmental Policy Act calls for the federal government to "attain the widest range of beneficial uses of the environment without degradation," and "preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice."

The proposal would instead restrict the uses of the environment; threaten historic, cultural, and natural aspects of our heritage; and limit the diversity of use.

3) The National Environmental Policy Act requires that for "major Federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on i) the environmental impact of the proposed action, and ii) any adverse environmental effects which cannot be avoided should the proposal be implemented."

The NPS proposal would have enormous impact on the human and natural environment, to an extent that clearly calls for an Environmental Impact Statement:

Construction of a 35,000-square-foot building would require the use of heavy construction equipment that would threaten the structural stability of the Potomac River bank and the C&O Canal bank.

- Clearing the land for building would eliminate shade and wooded views for thousands of bikers and hikers on the Capital Crescent Trail and boaters on the Potomac River; habitat for fish and small mammals; and protected fishing spots.
- Clearing the riverbank vegetation that naturally slows floodwaters would increase the risk of floodwaters affecting downstream structures.
- At 54 feet tall, the boathouse would tower over the Capital Crescent Trail and would obstruct winter views of the river from the C&O Canal Towpath and Canal Road.
- During construction, hikers, bikers, roller bladers, and baby strollers would tangle with construction and materials delivery vehicles along the Capital Crescent Trail--a potentially dangerous situation.
- After construction, trail users would encounter awkward boat trailers more than 100 feet long--a potentially dangerous situation.
- The proposal sets an alarming precedent for removing protected parkland from national protections and from public use.

4) The National Park Service prepared an Environmental Assessment (EA) on the land swap alone in 1995--nine years ago. The EA acknowledged the park site to be traded away is in an area designated as wetland, contains small mammal habitat, and is used for recreational activities. The EA admitted that the start of the Capital Crescent Trail would double as the access road for boats, equipment, supplies, and public safety vehicles. Yet, by failing to consider the numerous additional impacts, the NPS was able to issue a Finding of No Significant Impact.

The following shortcomings of the Environmental Assessment render it inadequate:

- In nine years, the vegetation, wildlife habitat, and use of the Capital Crescent Trail, C&O Canal Towpath, and river have grown, and the EA cannot be said to represent the current environment.
- The EA does not demonstrate that the land to be obtained is equivalent in value to the park site to be given away.
- The EA did not consider the construction of an enormous building on the park site to be given away.
- Since the land swap was first proposed, the proposed size of the boathouse has grown from 4,000 square feet to 35,000 square feet.
- The EA considered only the portion of the park site within 1000 feet from the Key Bridge, and the current proposal extends beyond that.
- The EA mentions the park site is next to an existing boathouse without mentioning that it is a historically preserved structure that would be affected by heavy construction and by removal of upstream vegetation that slows floodwaters.
- The EA said development of the park site would stop "activities and parking that are unrelated to nonmotorized recreational boating" without identifying specifics. The only parking that occurs on the site is in the parking lot of the existing historic boathouse and is directly related to nonmotorized recreational boating. The other activities that take place on the site are fishing, biking, hiking, and picnicking. The EA does not identify why these are considered inappropriate uses of national parkland.

- The EA said that the proposal would stop "trespasses" that occur on the park site, but it doesn't specify what activity is considered a "trespass" on national parkland.

- The only "no action" alternative considered in the EA assumes that Georgetown University would develop the property they propose to swap, instead of treating that possibility as a separate action. The EA doesn't consider a true "no action" alternative for the park site, which would force the NPS to consider separate action to halt negative impacts associated with the Georgetown property.

- The EA doesn't consider the alternative of buying the Georgetown property to halt negative impacts associated with it--even though the National Park Service has spent considerable money and effort over 30 years acquiring private homes and land to add to the park.

The letter and the spirit of the National Environmental Policy Act call for the cognizant federal agency to evaluate the entire proposal, including the full size and ultimate disposition of the public land involved; to consider alternatives to the proposal, including a legitimate "no action" alternative for the park site; and to consider the entire range of impacts--and to do so in a timely manner.

5) Across the Potomac River in Virginia, the National Park Service proposes construction of a different boathouse on national parkland along the Potomac River. In this case, an Environmental Impact Statement process is under way. Why is the NPS carrying out this legal requirement for one national park site but not for another?

I urge you to stop the National Park Service from completing the proposed land swap, and, before any further action is taken, to require an Environmental Impact Statement evaluating all impacts of any land exchange and subsequent construction within the C&O Canal National Historical Park.

Many years ago, Supreme Court Justice William Douglas fought to preserve the historic and cultural nature of the C&O Canal. More recently, hundreds of volunteers fought to convert the former railroad bed to a scenic recreational trail. The National Park Service itself continues to enlarge and improve the park. The current proposal, if allowed to continue, threatens to undermine these efforts to protect and preserve national assets. I hope you will act before it is too late.

Sincerely,  
Amber Jones



## *Washington Canoe Club*

3700 WATER STREET, NW  
WASHINGTON, D.C. 20007

7/15/2003

Secretary, Commission of Fine Arts  
National Building Museum  
401 F Street, NW, Suite 312  
Washington, D.C., 20001-2728

**REF: Proposed Georgetown University Boathouse**

Dear Mr. Atherton:

I noted with interest that the Georgetown Waterfront Park ("From Key Bridge to 31<sup>st</sup> Street") is listed as an agenda item for the July 17<sup>th</sup>, 2003 meeting. Unfortunately, I will be on travel and thus unable to attend. Because a portion of the non-motorized boathouse zone of the Georgetown Waterfront Park is outside that piece of the Park that is listed as an agenda item, I can only assume that the portion west of Key Bridge will be considered at a separate meeting. I look forward to attending that meeting and providing input. Until that meeting, I wanted to make sure that I shared the following information with the Commission.

As I'm sure you are aware a broad range of national, regional and local organizations opposes the proposed Georgetown University Boathouse. These include the National Parks Conversation Association, the Sierra Club, the Audubon Naturalist Society, American Whitewater, American Canoe Association, Potomac Conservancy, Coalition of the Capital Crescent Trail, the C&O Canal Association, and the Washington Canoe Club. These organizations total almost two million members.

The proposed GU Boathouse it is almost 300 feet long, 60 to 85' wide and 41 to 54' tall with a footprint of 22,800 square feet and totaling 35,500 square feet of space. As proposed the University Boathouse will be seven times the size of Washington Canoe Club. It will be twice as tall as Washington Canoe Club, placing it above Canal Road and if built as proposed will sit seven feet from the river being almost twice as wide and over twice as long as the Washington Canoe Club. Proponents of the University Boathouse will have you believe that every square foot is needed: do not believe them. I'm including a spreadsheet (Table 1) that lists the boathouses from the Universities that Georgetown is in competition with. Note that the only boathouse larger is still a proposal (University of Wisconsin) and further is a multi-use facility replacing the current boathouse on the existing site.

Georgetown University proposes to build a boathouse straddling the edge of the approved "non-motorized boathouse zone" of the Georgetown Waterfront Park". As currently proposed the building is between 150 to 250 feet outside the approved "non motorized boathouse zone". In addition to National Capital Planning Commission approval, the exchange agreement between GU and NPS requires Commission of Fine Arts approval for the construction outside the approved boathouse zone. In other words, the building is being built in the C&O Canal NHP and not just in the Georgetown Waterfront Park. Georgetown and the National Park Service claim that the building has to be built further west to accommodate the 84" sewer line that runs under the building. However, they only moved west an additional 36 feet. What they did was make the building even bigger than originally envisioned. This is most unfortunate. Public access to documents that indicate the size and scope of the project was not nearly as great as that for the Environmental Assessment (which calls out a

boathouse zone 1000' west of Key Bridge), or the well-known map of the Georgetown Waterfront Park. Conforming to these documents would have restricted the building to a maximum length of either 120 or 220 feet. (There is some confusion as to where the Boathouse Zone actually ends. The approved Boathouse zone is 1000'. It might be true that all the required parties extended it 1100', but that's not clear.) According to our measurements this places the western most extent of the nonmotorized boathouse zone 180 to 280 feet west of WCC. This would partially explain the public's shock and surprise at the size of the boathouse. A boathouse built within the actual approved nonmotorized boathouse zone would be much smaller than that currently proposed by Georgetown University. Assuming a 12' side setback the building would be approximately 120 feet to 220 feet wide. Clearly this is what the C&O Canal NHP, NCPC and ACHP were thinking of when they approved a boathouse being built on the site. Additionally, as the public document of record, persons concerned about the boathouse would have seen the EA and decided that the boathouse would not be sufficiently large to warrant concern. This is a similar sentiment to that one would come to when seeing the artist rendering presented on the official GU Athletic Department website - namely a building that in some ways looks smaller than WCC.

Accordingly, I urge the CFA to not approve the "hardship" waiver to Georgetown University. If they must build on that site, make the building conform to the original boathouse zone. I believe that zone to be 1000' above Key Bridge. That would make the building long than Potomac Boat Club, a facility that could easily accommodate Georgetown Universities programmatic needs.

There are at least three other sites in the approved "non motorized boathouse zone" that could accommodate boathouses. These include the old Dempsey's site, the location Jacks Boathouse (with or without the three townhouses), and the site below Key Bridge. All of these sites could accommodate boathouses the size of Potomac Boat Club. All would be larger than the Dartmouth University, Columbia College or Rutgers Boathouses to name a few (see Table 1).

Georgetown University consistently claims that the proposed facility is "significantly smaller" than most boathouses being built today, and "average in size" compared to their competition. In fact, if built it will be the largest boathouse on the east coast and three times to four times the size of the boathouses on the famous Philadelphia "Boathouse Row" which the Georgetown Waterfront Park wishes to emulate.

We examined the documents submitted to CFA and the minutes from the CFA hearing on the proposed Boathouse. I was stunned by the comment that "although 30,000 sf [square feet] is on the smaller side of what most universities are building, it is larger than the two adjacent boathouses". First the boathouse is actually 35,500 square feet (20% larger than claimed), and second it is demonstrably larger than what most universities are building. Table (1) lists the dates of construction and/or major renovation. The most recent NEW construction on a new site (not replacing an existing boathouse) is the Columbia College Boathouse of 11,000 square feet. The language "on the smaller side" would imply a boathouse of 11,000 square feet. Which, incidentally is about the right size for Washington's boathouse row.

If the accurate facts had been presented to the CFA, would the enthusiastic endorsement been given? The oblique angle rendering that was presented to the CFA (Figure 1) is in sharp contrast to Figure 2. The photo-montage (Figure 2) that shows the GU Boathouse from across the river wasn't generated until WCC requested it for a December 2002 meeting. Clearly Georgetown has worked hard to conceal the size and bulk of the structure until the very last minute.

For example, it wasn't until the June 5th hearing that opponents and the general public learned that Georgetown University wasn't asking for a fifteen-foot variance but rather a seven-foot variance from the waters edge. The Office of Planning offered a number of suggestions to reduce the bulk in an effort to break up the scale of the waterfront elevation.

Proponents of the GU Boathouse had previously touted the endorsement of the C&O Canal NHP Advisory Commission only to "discover" that they didn't have it. The C&O Canal NHP Advisory Commission refused to endorse the boathouse at a June 20<sup>th</sup>. 2003 meeting, expressing the opinion that it is too big and too high. This should not have been a surprise to Georgetown University. They had previously met with the C&O Canal Advisory Commission and had been told that it was too big and too tall at that meeting as well. The Commission had been assured that "it was a work in progress" and that it would be revised and re-presented. Not surprisingly, when the same building was presented, it was also deemed too big.

Likewise, proponents had claimed the Advisory Council on Historic Preservation and the DC State Historic Preservation Office had both approved the GU Boathouse. The Memorandum of Agreement between the NPS, ACHP and DC SHPO states that the building will be 50% smaller and 1/3 lower than proposed. What changed? Why did GU decide to make it larger? Perhaps that was the plan all along, and they just didn't bother to tell anyone. Certainly the drawings on the GU Athletic Department website are disingenuous at best. They portray a building that is roughly the same size as WCC. It certainly doesn't look twice as tall, twice as long and twice as wide. Perhaps they should do the engineering analysis, verify that the building and access road are feasible and then build a building that actually fits the site and fits the picture they've portrayed to date.

Proponents, including portions of the NPS, refuse to consider any impacts on the C&O Canal and its views. The view is historic, and is there all year. All this and next year is the 50th anniversary of Justice Douglas' walk that led to its establishment. What a shock it would be to Justice Douglas to witness the construction of the proposed building. It would be the largest structure ever built in the C&O Canal NHP.

More worrisome, however, is that no engineering analysis backs up the claim that there is no potential for damage to the C&O Canal embankment. We've been told that they don't intend to put a retaining wall in when moving the Capital Crescent Trail. Yet, amazingly, there are no Professional Engineering "stamped" drawings or engineering report to back up the claims. As an engineer from Whiting Turner told me at a dinner party, "it's better to beg forgiveness than ask permission". That might be acceptable in normal construction, and certainly the number of townhouses collapsing in Georgetown recently would seem to bear it out. I would submit, however, that is unacceptable when it comes to the C&O Canal. I'd like to think that it's also unacceptable when it comes to the Washington Canoe Club, but I recognize that while on the National Historic Registry, WCC pales in comparison to the C&O Canal. Civil Engineers are careful. If they aren't willing to put their license on the line by stamping an engineering analysis showing the lack of potential impact, then there are obviously grave concerns about such an impact. The use of Auger piles and the injection of grout under high pressure 30' from the two hundred year old Canal embankment should give pause to anyone aware of such construction techniques.

Finally, as I drive home on the George Washington Parkway, I am struck by the beauty of the Potomac River Gorge and the C&O Canal behind it. One's eye isn't drawn up to the University on the bluff above, but rather to the water and the trees. In particular the area in the first 1500 feet above Washington Canoe Club, as this is the only part of the Washington Palisades that is visible from the road as you are speeding along prior to the Spout Run exit (at 35 mph of course). I believe that the proposed boathouse, no matter how beautifully designed, is of such a grand scale that it will mar that view in a truly devastating manner. Clearly these are the views that the NCPH is trying to preserve when they state in their February 2001 revised Comprehensive Plan for the National Capital Parks, Open Space, and Natural Features Element:

"View corridors should be maintained to the monumental city of Washington – such as those experienced when traveling southbound on the George Washington Memorial Parkway (GWMP) atop the Potomac Palisades, or northbound along the GWMP from Alexandria – **should be maintained and protected for the enjoyment of all** [emphasis mine]."

Additionally the NCPH states that: "The C&O Canal NHP should be preserved as a legacy of inland waterway development. It should serve as a recreational area for non-motorized uses, such as bicycling, jogging, hiking, and boating though **preservation of the park's historic resources should take precedence over the provision of**

recreational activities [emphasis mine]. Adjacent development should be kept at a low density, except east of Key Bridge."

Further that "As a great natural area, the Potomac Palisades...should reflect the nature which controlled early settlement in the Region. Conspicuous man-made forms should be avoided upstream from Key Bridge [emphasis mine]."

VR & thank you very much,

Lawrence C. Schuette, Ph.D.  
President, WCC  
PO BOX 25449  
Washington, DC 20375

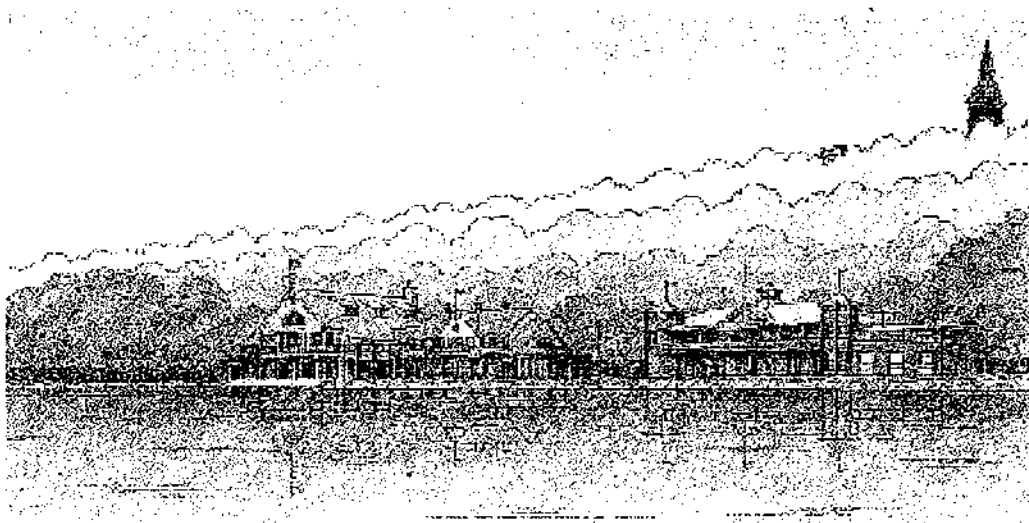


Figure 1) Rendering showing GU Boathouse and WCC.

Notice the use of two different perspectives within the same drawing to make WCC appear larger than portions of the GU boathouse. Actually the east wing of GU's Boathouse is larger than WCC!



Figure 2) Photo-Montage of GU Boathouse and WCC

This picture has only been available since December of 2002.



Georgetown's Proposal		Year Built or Renovated	Student Body	Total Square Footage	Fraction	Height of Roof Line	Length on Shoreline	Include Rowing Tanks	Seats in Tanks	Distinctly Larger	Similar Size	Distinctly Smaller	Comments
proposed		proposed	6418	35,524	100%	54	292	Yes	24				
1 Boston Univ.	DeWolfe	1999	17,819	20,000	56%	40	125					Yes	Tanks on campus.
2 Brown	Marston	1966	6,029	25,000	70%	40	175	Yes	16			Yes	
3 Cornell	Collier	1957 & 1970s	8,381	21,000	59%	35	160					Yes	Tanks on campus.
4 Columbia	Class of 1929	2001	6,623	10,000	28%	30	75					Yes	
5 Dartmouth	Friends	1986	4,047	11,400	34%	30	75					Yes	Tanks on campus.
6 Harvard	Newell	1900	4,843 M	19,000	53%	32	150	Yes	16			Yes	Shared facility
6 Harvard	Weld	1906	19,337	20,000	56%	44	180					Yes	
7 MIT	Pierce	1958	4,258	17,100	48%	22	95'	Yes	8			Yes	
8 Northeastern	Henderson	1990	19,588	18,000	54%	35	100					Yes	Tanks on campus.
9 Princeton	Shea	1887 & 2001	4,663	33,500	94%	34	250	Yes	16		Yes		Shared facility
10 Rutgers	Class of 1914	1961	3,717	10,000	28%	24	110					Yes	
11 Syracuse	Ten Eyck	1937 & 1988	12,386	15,000	42%	30	100					Yes	
13 Univ. of Penn	Penn	1876	11,686	12,000	34%	30	100					Yes	
14 USNA	Fisher	1930	4,172	17,600	50%	36	110	Yes	10				
15 Wisconsin	Crewhouse	2003	29,697	52,000	146%			Yes	16	Yes			As proposed, not built yet
16 Yale	Gilder	1999	5,286	22,400	63%	30	150					Yes	Tanks on campus.

**Bolded Numbers are per School Website, Architect or Builder of Record**

Others are from measurements, onsite or photogrametric

median boathouse = 18,500 square feet  
average boathouse = 20,250 square feet

Median East Coast boathouse = 18,000  
Average East Coast boathouse = 18,133



## *Washington Canoe Club*

3700 WATER STREET, NW  
WASHINGTON, D.C. 20007

10/20/2003

Secretary  
National Planning Commission  
401 9th Street, NW, Suite 500  
Washington, D.C., 20576

Dear Sirs:

We noted with interest that the Georgetown Waterfront Park ("From 34<sup>th</sup> Street to 31<sup>st</sup> Street") is listed as an agenda item for the September 4th, 2003 meeting. Washington Canoe Club was one of the organizations that donated money in the mid 1990s to help make the Park a reality. WCC is not opposed to the Park, but rather we wish to express concern about the manner in which the Park is being submitted to the approval process. We believe that only by looking at the entire proposed Park can the needs of all the citizens be adequately balanced and ultimately addressed.

We ask that you consider moving the non-motorized boathouse zone an additional block east to include 33<sup>rd</sup> Street. It would seem to make sense to cluster boathouses near the site of the proposed Barge Restaurant. At the D.C. Zoning Commission hearings held last spring for the proposed Georgetown University Boathouse it was clear that there is a large un-met need for boat storage on the Potomac River. The region below 34<sup>th</sup> Street is advantageous to river users because public access will be simpler and the docks won't block the river (and the first arch of the Key Bridge which is of particular concern to Potomac Boat Club). Additionally because the location is less susceptible to flooding the boathouses could be made smaller and more in keeping with the character of the Park. And again because the critical issue is boat storage and access to the river, the buildings in the 33<sup>rd</sup> block could be made in very modest fashion, allowing critical views and sight lines to remain unblocked.

One Boathouse that could immediately be sited at the eastern edge of the boathouse zone is the one proposed by Georgetown University. The current proposal is for a site straddling the C&O Canal NHP and the western edge of the non-motorized Boathouse zone of the Georgetown Waterfront Park. A broad range of national, regional and local organizations oppose the proposed Georgetown University Boathouse at that location. These include the National Parks Conversation Association, the Sierra Club, the Audubon Naturalist Society, American Whitewater, American Canoe Association, Potomac Conservancy, Coalition of the Capital Crescent Trail, the C&O Canal Association, and the Washington Canoe Club. These organizations total almost two million members.

The proposed GU Boathouse it is almost 300 feet long, 60 to 85' wide and 41 to 54' tall with a footprint of 22,800 square feet and totaling 35,500 square feet of space. As proposed the University Boathouse will be seven times the size of Washington Canoe Club, and three times the size of Potomac Boat Club. It will be twice as tall as Washington Canoe Club, placing it above Canal Road and if built as proposed will sit just seven feet from the river. If sited at 34<sup>th</sup> Street it would be taller than the Whitehurst Freeway, but at least would fit in nicely with the industrial nature of the buildings to the north of Water Street.

Because of the extreme size of the boathouse, Georgetown University proposes to build the boathouse straddling the edge of the approved "non-motorized boathouse zone" of the Georgetown Waterfront Park". As currently proposed the building is between 150 to 250 feet outside the approved "non motorized boathouse zone". It will require (your) National Capital Planning Commission approval for the construction outside the approved boathouse zone. We urge you not to grant approval. Georgetown and the National Park Service claim that the building has to be built further west to accommodate the 84" sewer line that runs under the building. However, they only moved west an additional 36 feet. What they did was make the building even bigger than originally envisioned. This is most unfortunate.

Public access to documents that indicate the size and scope of the project was not nearly as great as that for the Environmental Assessment (which calls out a boathouse zone 1000' west of Key Bridge), or the well-known map of the Georgetown Waterfront Park. Conforming to these documents would have restricted the building to a maximum length of either 120 or 220 feet. (There is some confusion as to where the Boathouse Zone actually ends. The approved Boathouse zone is 1000'. It might be true that all the required parties extended it 1100', but that's not clear.) According to our measurements this places the western most extent of the nonmotorized boathouse zone 180 to 280 feet west of WCC.

This would partially explain the public's shock and surprise at the size of the boathouse. A boathouse built within the actual approved nonmotorized boathouse zone would be much smaller than that currently proposed by Georgetown University. Assuming a 12' side setback the building would be approximately 120 feet to 220 feet wide. Clearly this is what the C&O Canal NHP, NCPC and ACHP were thinking of when they approved a boathouse being built on the site. Additionally, as the public document of record, persons concerned about the boathouse would have seen the EA and decided that the boathouse would not be sufficiently large to warrant concern. This is a similar sentiment to that one would come to when seeing the artist rendering presented on the official GU Athletic Department website - namely a building that in some ways looks smaller than WCC.

Georgetown University consistently claims that the proposed facility is "significantly smaller" than most boathouses being built today, and "average in size" compared to their competition. In fact, if built it will be the largest boathouse on the east coast and three times to four times the size of the boathouses on the famous Philadelphia "Boathouse Row" which the Georgetown Waterfront Park wishes to emulate.

Proponents of the GU Boathouse had previously touted the endorsement of the C&O Canal NHP Advisory Commission only to "discover" that they didn't have it. The C&O Canal NHP Advisory Commission refused to endorse the boathouse at a June 20<sup>th</sup>, 2003 meeting, expressing the opinion that it is too big and too high. This should not have been a surprise to Georgetown University. They had previously met with the C&O Canal Advisory Commission and had been told that it was too big and too tall at that meeting as well. The Commission had been assured that "it was a work in progress" and that it would be revised and re-presented. Not surprisingly, when the same building was presented, it was also deemed too big.

Likewise, proponents had claimed the Advisory Council on Historic Preservation and the DC State Historic Preservation Office had both approved the GU Boathouse. The Memorandum of Agreement between the NPS, ACHP and DC SHPO states that the building will be 2/3<sup>rd</sup> smaller and 1/3<sup>rd</sup> lower than proposed.

Finally, as I drive home on the George Washington Parkway, I am struck by the beauty of the Potomac River Gorge and the C&O Canal behind it. One's eye isn't drawn up to the University on the bluff above, but rather to the water and the trees. Clearly these are the views that the NCPC is trying to preserve when they state in their February 2001 revised Comprehensive Plan for the National Capital Parks, Open Space, and Natural Features Element:

"View corridors should be maintained to the monumental city of Washington - such as those experienced when traveling southbound on the George Washington Memorial Parkway (GWMP) atop the Potomac Palisades, or northbound along the GWMP from Alexandria - should be maintained and protected for the enjoyment of all [emphasis mine]."

Additionally the NCPC states that: "The C&O Canal NHP should be preserved as a legacy of inland waterway development. It should serve as a recreational area for non-motorized uses, such as bicycling, jogging, hiking, and boating **though preservation of the park's historic resources should take precedence over the provision of recreational activities [emphasis mine]**. Adjacent development should be kept at a low density, except east of Key Bridge."

Further that "As a great natural area, the Potomac Palisades...should reflect the nature which controlled early settlement in the Region. **Conspicuous man-made forms** should be avoided upstream from Key Bridge [emphasis mine]."

VR & thank you very much,

Lawrence C. Schuette, Ph.D.  
President, WCC  
PO BOX 25449  
Washington, DC 20375

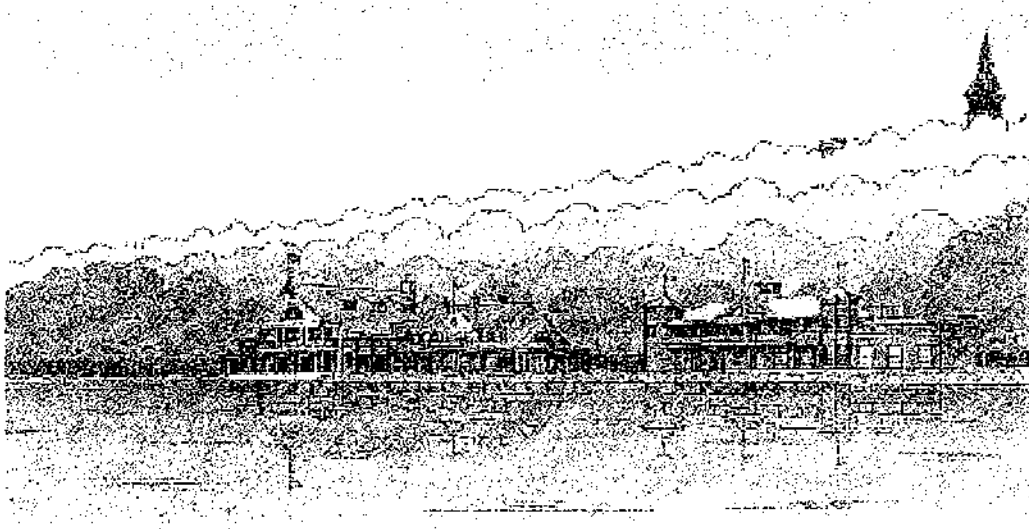


Figure 1) Rendering showing GU Boathouse and WCC.

Notice the use of two different perspectives within the same drawing to make WCC appear larger than portions of the GU boathouse. Actually the east wing of GU's Boathouse is larger than WCC!



Figure 2) Photo-Montage of GU Boathouse and WCC

This picture has only been available since December of 2002.

Georgetown's Proposal	Year Built or Renovated	Student Body	Total Square Footage	Fraction	Height of Roof Line	Length on Shoreline	Include Rowing Tanks	Seats in Tanks	Distinctly Larger	Similar Size	Distinctly Smaller	Comments
	proposed	6418	35,524	100%	54	292	Yes	24				
1 Boston Univ.	1999	17,819	20,000	56%	40	125					Yes	Tanks on campus.
2 Brown	1966	6,029	25,000	70%	40	175	Yes	16			Yes	Yes
3 Cornell	1957 & 1970s	8,381	21,000	59%	35	160					Yes	Tanks on campus.
4 Columbia	Class of 1929	6,623	10,000	28%	30	75					Yes	Yes
5 Dartmouth	1986	4,047	11,400	34%	30	75					Yes	Tanks on campus.
6 Harvard	1900	4,843 M	19,000	53%	32	150	Yes	16			Yes	Shared facility
6 Harvard	1906	19,337	20,000	56%	44	180					Yes	Yes
7 MIT	1958	4,258	17,100	48%	22	95'	Yes	8			Yes	Yes
8 Northeastern	1990	19,588	18,000	54%	35	100					Yes	Tanks on campus.
9 Princeton	1887 & 2001	4,663	33,500	94%	34	250	Yes	16		Yes		Shared facility
10 Rutgers	Class of 1914	3,717	10,000	28%	24	110					Yes	Yes
11 Syracuse	1937 & 1988	12,386	15,000	42%	30	100					Yes	Yes
13 Univ. of Penn	1876	11,686	12,000	34%	30	100					Yes	Yes
14 USNA	1930	4,172	17,600	50%	36	110	Yes	10				
15 Wisconsin	Crewhouse	29,697	52,000	146%			Yes	16	Yes			As proposed, not built yet
16 Yale	1999	5,286	22,400	63%	30	150					Yes	Tanks on campus.

#### Bolded Numbers are per School Website, Architect or Builder of Record

Others are from measurements, onsite or photogrametric

median boathouse = 18,500 square feet  
average boathouse = 20,250 square feet

Median East Coast boathouse = 18,000  
Average East Coast boathouse = 18,133



## *Washington Canoe Club*

3700 WATER STREET, NW  
WASHINGTON, D.C. 20007

October 30, 2003

Secretary  
National Capital Planning Commission  
401 9th Street, NW, Suite 500  
Washington, D.C., 20576

Dear Commissioners:

It was with interest that I received the notice of the NCPC hearing to be held on November 6th, 2003. Please consider the following regarding ZC 02-30, the zoning of Tract 102-114.

1) Zoning the land W-0 would be in contradiction with prior NCPC guidance regarding construction west of Key Bridge, in particular the February 2001 Comprehensive Plan for the National Capital where you state that "As a great natural area, the Potomac Palisades... should reflect the nature which controlled early settlement in the Region. Conspicuous man-made forms should be avoided upstream from Key Bridge." This zoning will indeed allow a conspicuous structure west of Key Bridge. It is claimed that GU will build further upstream if permission isn't granted on Tract 102-114. Surely the Federal government doesn't have to allow construction there, the upstream site would place the building in a flood plane which is under water a large number of times a year due to it being only 5-6' above the normal high-tide. Certainly you would have to approve that structure as well and thus would be able to reign in such wanton construction. Many people purchase land (or are bequeathed as in the case of Georgetown University), which they subsequently learn they cannot build on. Georgetown Universities upstream site should return to the public trust, perhaps through the Potomac River Foundation.

2) By far the best reason to reject the W-0 zone request is that the DC W-O zoning is not sufficiently restrictive for Tract 102-114. The DC W-O zoning was specifically crafted to allow Georgetown University to develop a 58' tall structure that covers 50% of a 48,000 square foot lot. Interestingly only Boathouses are allowed under W-0 to cover 50% of the lot. Other facilities would only be allowed to cover 25% of the lot. This "Boathouse exception" was specifically made for Georgetown University. Does NCPC really want such a private facility west of Key Bridge? The public doesn't, and would be ill served by such construction, especially when the size is not dictated by rowing needs, but rather Georgetown University desires. Our comments to the DC Zoning Commission regarding the impact to the C&O Canal NHP and the Potomac River Gorge regarding the W-O zone were ignored. We specifically requested that the height only be 30' and that the coverage be kept at 25%. Washington Canoe Club is only 26 feet tall and is thus well below the C&O Canal. The W-O zone will allow buildings to stand 25 feet above the C&O Canal!

3) Tract 102-114 straddles the dividing line between the Georgetown Waterfront Park and the C&O Canal National Historic Park. It is simply inappropriate to zone the C&O Canal NHP W-0. If the building was smaller (as originally proposed and "sold" to the public) it wouldn't need to be situated in the C&O Canal NHP, rather it would fit within the "Non motorized Boathouse Zone" portion of the Georgetown Waterfront Park.

4) While this action may be simply to consider the zoning process, since the design of the building is well known at this point it seems reasonable to mention the following:

a) The proposed structure is enormous, it blocks the views from the C&O Canal, and it will likely endanger the C&O Canal during construction and during floods. Certainly no engineering analysis exists that demonstrates otherwise. It also damages sight lines from the river and the Virginia shoreline.

b) The proposed design was strenuously objected to by the C&O Canal NHP Presidential Advisory Commission along with dozens of other organizations. Mr. Parsons (NCR NPS) had previously and repeatedly claimed to have the Commissions approval. He further used that approval as proof that others did not share our concerns of damage to the C&O Canal NHP. I attended the meeting where he presented the proposed design that all members of the Commission as well as the Supervisor of the C&O Canal NHP Park. In addition to the Commission unanimously voting to raise concerns about the size and height of the structure, Mr. Ferris was heard to loudly comment: "It's too large John".

c) The size of the proposed structure has no legitimate rowing basis. Surely GU doesn't need a boathouse double the size of Thompsons for only 170 students. It's also more than triple the size of the average boathouse and seven times the size of it's nearest neighbor. This structure will not solve the "rowing crisis" caused by the Swedish embassy; it only exacerbates it by raising the red flag. Further, Georgetown has a very small number of "Eights" (16) at Thompsons. GU leaving will do little to solve the space problem.

d) Significantly, the NPS, DC SHPO and the ACHP agreed during the Historic Review Process that the building would be 1/3 lower and 2/3rds smaller than proposed. NCPC was a signatory to this 106 process, which the proposed structure violates.

e) The building is so large that by the exchange agreement between NPS and GU, NCPC must approve its encroachment west into the C&O Canal NHP.

Given the tremendous impact of the private boathouse to the public, and in particular the grand and unnecessary scale of the boathouse it is requested that approval for the W-0 should not be granted. Nor should the encroachment into the C&O Canal NHP be approved. The National Park Service and Georgetown University should be urged to submit a proposal for a structure that is in keeping with the historic nature of the C&O Canal NHP, is similar in size and scale to Washington Canoe Club, Potomac Boat Club and Thompsons Boat Center. Such a structure would not block the views from the C&O Canal, would compliment rather than overwhelm, and wouldn't need to be sited in the C&O Canal NHP.

Very Respectfully and Thank you,

/s/

Larry Schuette

President

Washington Canoe Club

PO BOX 25449

Washington DC, 20007

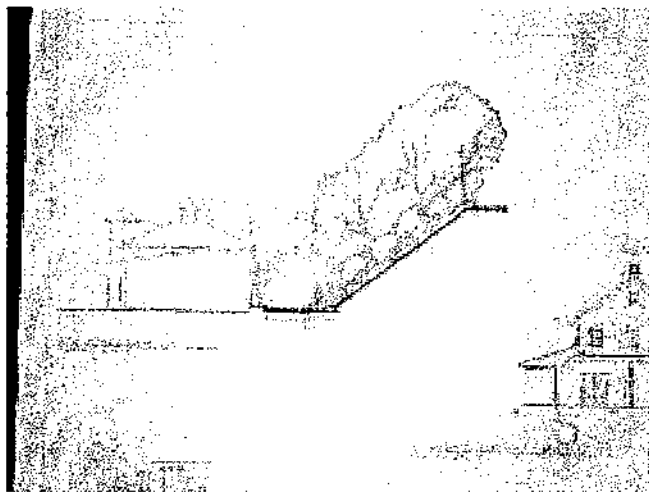
For your consideration, here are some photos of the proposed structure



The photomontage finally provided by Georgetown University in December of 2002.



Side view of the proposed GU Boathouse, 21 feet above the canal and 7 feet above Canal road



Side view showing WCC below the Canal





## *Washington Canoe Club*

3700 WATER STREET, NW  
WASHINGTON, D.C. 20007

6/27/2003

Director, Office of Zoning  
Suite 210  
441 4<sup>th</sup> Street, N.W.  
Washington, D.C. 20001

**REF: Case No. 02-30 (Georgetown University & U.S. National Park Service)**

Dear Ms Mitten:

Please find attached additional material for the record from Washington Canoe Club in the matter of Case 02-30. I hope these are helpful in considering the matters before you.

1) A letter from the Bureau of Environmental Quality to the Office of Planning requesting an Environmental Impact Statement. Obviously we concur with Mr. Collier and his office regarding this matter. The project is sufficiently large and in an area that warrants an EIS. The Army Corp of Engineers states that wetlands do exist in the proposed boathouse tract. They are dismissive about the quality of the wetlands. I do not believe that the environmental regulations make or require an assessment about the quality of the wetlands, only that they exist. Further, since the EA was undertaken the area has seen a large growth in wildlife. I regularly see bald eagles, osprey, heron and other wildlife on that tract of land. Clearly an Environmental Impact Statement is needed and WCC hereby requests it.

2) A copy of the memorandum of agreement (MOA) between the NPS, ACHP and DC SHPO is attached. In particular the stipulations on page 3 are of interest. Namely that the building be under 15,000 square feet in footprint and under 40' tall as measured from grade. It is the position of WCC that the 40' height should be measured from the water in a manner similar to that provided in photograph of WCC that Georgetown University provided, as the river is the substantial and substantive "grade" for the waterfront. For the record, WCC is 37' above the waterline. A GU boathouse that was of similar height would not overwhelm the Washington Canoe Club in the manner that a boathouse that is nearly twice the height obviously will. We intend to request that the 106-review process be re opened. Now that the building plans are well known, a better assessment of the potential impact on the C&O Canal NHP and the Washington Canoe Club can be better performed. As indicated in testimony, we are very concerned about the impact of building a boathouse directly upstream of WCC. This concern is for both the C&O Canal and WCC.

3) A copy of the environmental assessment (EA) is included. In the EA, we call attention to what is known as the non-motorized boathouse zone as described on page (5). This zone is to extend 1000' above Key Bridge. According to our measurements this places the western most extent of the nonmotorized boathouse zone 180 feet west of WCC. This would partially explain the public's shock and surprise at the size of the boathouse. A boathouse built within the actual approved nonmotorized boathouse zone would be much smaller than that currently proposed by Georgetown University. Assuming a 12' side setback the building would be approximately 120' wide. This would make it wider than Potomac Boat Club and slightly smaller than WCC.

Clearly this is what the C&O Canal NHP, NCPC and ACHP were thinking of when they approved a boathouse being built on the site. Additionally, as the public document of record, persons concerned about the boathouse would have seen the EA and decided that the boathouse would not be sufficiently large to warrant concern. This is a similar sentiment to that one would come to when seeing the artist rendering presented on the official GU Athletic Department website - namely a building that in some ways looks smaller than WCC.

In the exchange agreement the nonmotorized boathouse zone is referenced as being 1100', and further in the exchange agreement it is once again extended from 1100' to 1250' provided the Commission of Fine Arts and the National Capital Planning Commission provide concurrence. We do not believe that the Georgetown Waterfront Master Plan has been properly amended to reflect this additional 250' of C&O Canal National Historic Park. Further, we've requested that the NCPC to check to see if their concurrence has been given to extend the boathouse zone. Note that this concurrence is not needed to build a boathouse in the boathouse zone, but rather to accommodate the proposed grand structure that overwhelms WCC and the other historic boathouses. Accordingly, we believe that the NCPC language regarding the need to restrict "significant structures west of Key Bridge" should apply to the region west of the approved 1000' nonmotorized boathouse area. Tract 102-114 straddles the C&O Canal NHP and the boathouse zone of the GWP. Clearly, if built the boathouse should be in that portion of the Boathouse zone that is in the 1987 Plan and not any further upstream. GU should be encouraged to provide public access both to the boathouse and to the park area on their upstream portion of the property.

4) We also provide the submittal documents provided by GU and the NPS to the CFA. In neither those documents nor the minutes of the CFA hearing provided by Georgetown University is the distance from Key Bridge ever discussed as an issue, or a point that requires a motion. Accordingly, we believe that permission has not been granted. We have requested that NCPC examine their files to see if they ever granted permission. Moreover, the comment "although 30,000 sf. is on the smaller side of what most universities are building, it is larger than the two adjacent boathouses" must be commented on. First the boathouse is actually 33,200 square feet, and second it is demonstrably larger than what most universities are building. The language "on the smaller side" would imply a boathouse of 11,000 square feet. Which, incidentally is about the right size for Washington's boathouse row. If the accurate facts had been presented to the CFA, would the enthusiastic endorsement been given?

5) WCC has grave concerns regarding the non-rowing usage of the facility. In the CFA submission we see "the great room "can be used for other functions – but in this case, primarily for exercise." Georgetown University and the National Park Service have gone on record at a number of meetings, emails and in ZC testimony that the primary purpose of the room is exercise. That there will be "no social functions" in the facility (NPS email, attached, section 10 page 5). Washington Canoe Club requests that a zoning order be placed prohibiting social functions from the facility. The language on their website GUHOYAS.com has been revised to remove the comments about future social events. The Zoning Order should be explicit, prohibiting social functions, and further from catering trucks from using the service road. I've attached the old and new versions of the website.

6) Additionally, in the Environmental Assessment on page (9) we note that the only DC office that was coordinated with in the preparation of the EA was the DC State Historical Preservation Office. Why was the Bureau of Environmental Quality (Air, Fish, Water) not consulted and coordinated with? It would seem that the EA is seriously flawed without the coordination of the Department in the District Government that upholds the environmental regulations.

7) During the June 19, 2003 hearing Commissioner May asked questions about the slide in my presentation showing the back of Washington Canoe Club from the C&O Canal. He was interested in the height of the building at the edge and the overall height of the building. This relates to the relative height of the proposed GU Boathouse and WCC and the view blockage that will occur. The latest drawing set was produced in May of

2003. The official height of WCC is 26.7 feet to the main roofline. Further, WCC sits into the slope of the site. Thus from the rear of the building the height of the main roofline is only 23 feet. The base of the window in the picture is 6' 6", and the drip edge of the roof is 13.3 feet. This helps explain why the 54' roofline appears so high. It is. Attached are copies of the drawings. I'm also attaching the slide and note page for easier reference.

8) Enclosed is a copy of the Excel Spreadsheet that was presented on June 19, 2003.

9) Additionally enclosed is the picture provided by Georgetown University of the rowing and paddling courses. WCC comments are provided on that sheet.

10) For the information of the Zoning Commission, I'd like to report that the C&O Canal NHP Advisory Commission met on June 20<sup>th</sup>. At that meeting, the NPS presented the GU Boathouse seeking approval of the design. Rather than approving it, the Commission passed a resolution expressing concern about the size and height of the boathouse. Further, much spirited discussion centered on what a boathouse meant ("a one story shed that boats are stored in, versus this Taj Mahal"), and what it should be used for. The commission was highly skeptical of the "exercise room" and what it would be used for.

11) Finally, as I drive home on the George Washington Parkway, I am struck by the beauty of the Potomac River Gorge and the C&O Canal behind it. One's eye isn't drawn up to the University on the bluff above, but rather to the water and the trees. In particular the area in the first 1500 feet above Washington Canoe Club, as this is the only part of the Washington Palisades that is visible from the road as you are speeding along prior to the Spout Run exit (at 35 mph of course). I believe that the proposed boathouse, no matter how beautifully designed, is of such a grand scale that it will mar that view in a truly devastating manner. Clearly these are the views that the NCPC is trying to preserve when they state in their February 2001 revised Comprehensive Plan for the National Capital Parks, Open Space, and Natural Features Element:

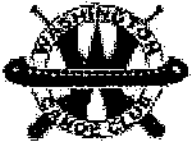
"View corridors should be maintained to the monumental city of Washington – such as those experienced when traveling southbound on the George Washington Memorial Parkway (GWMP) atop the Potomac Palisades, or northbound along the GWMP from Alexandria – **should be maintained and protected for the enjoyment of all** [emphasis mine]."

Additionally the NCPC states that: "The C&O Canal NHP should be preserved as a legacy of inland waterway development. It should serve as a recreational area for non-motorized uses, such as bicycling, jogging, hiking, and boating **though preservation of the park's historic resources should take precedence over the provision of recreational activities** [emphasis mine]. Adjacent development should be kept at a low density, except east of Key Bridge."

Further that "As a great natural area, the Potomac Palisades...should reflect the nature which controlled early settlement in the Region. **Conspicuous man-made forms** should be avoided upstream from Key Bridge [emphasis mine]."

VR & thank you very much,

Lawrence C. Schuette  
President, WCC  
PO BOX 25449  
Washington, DC 20375



## *Washington Canoe Club*

3700 WATER STREET, NW  
WASHINGTON, D.C. 20007

9/23/2003

Director, Office of Zoning  
Suite 210  
441 4<sup>th</sup> Street, N.W.  
Washington, D.C. 20001

REF: ZC Case No. 02-42(TA) Text Amendment – Waterfront Open Space District

Dear Ms Mitten:

I greatly appreciate the opportunity to review 02-42 as published. I found new version much easier to read, and offer the following comments.

Regarding Section 923, it now appears that Parking is required except where compliance would be unsafe or economically impractical. Neither of this criteria would seem to apply, and thus Georgetown University should allocate space for 18 parking spaces on the site of the proposed Boathouse. Parking onsite, which can be restricted by codicil to specific uses, would reduce the burden of the proposed facility on the other users of the area, including WCC, and PBC members, the C&O Canal and Capital Crescent Trail users.

Section 924.1(d) states that: "Buildings, structures, and uses on, under, or over water will be located and designed to minimize adverse impacts on the river and riverbank areas".

The proposed Boathouse has a permanent pier extending out into the river from which a semi-permanent dock will be attached. The applicant has not demonstrated that the permanent pier proposed by the applicants will not have an adverse impact on the river, and river users. Significant testimony was heard stating just the opposite, that the permanent pier would have substantial and significant impact.

Section 937.1 now states that the setback inland shall be 100' as a matter of right, with Section 937.3 stating that a special exception is required for between 20' and 100' setback.

The further restriction as a matter of right from 75' to 100' raises the bar for granting a special exception. The obvious implication is that construction in the Waterfront area needs to be minimal and keeping with the surroundings. When those surroundings are light industrial construction close to the river's edge can be allowed with minimal impact. When the surroundings are National Park then the construction should be minimal. This is consistent with NCPC's Comprehensive Plan:

"The C&O Canal NHP should be preserved as a legacy of inland waterway development. It should serve as a recreational area for non-motorized uses, such as bicycling, jogging, hiking, and boating though preservation of the park's historic resources should take precedence over the provision of recreational activities [emphasis mine]. Adjacent development should be kept at a low density, except east of Key Bridge."

Further that "As a great natural area, the Potomac Palisades...should reflect the nature which controlled early settlement in the Region. Conspicuous man-made forms should be avoided upstream from Key Bridge."

Clearly the further from the river bank the construction the less conspicuous it will be. WCC previously requested that the proposed structure be placed 35' from the river's edge. That would place it "in-line" with WCC, providing equal sight lines for both WCC members and Georgetown University students alike. Moving the matter of right setback inland to 100' would seem to strengthen the argument for that.

VR & thank you very much,

Lawrence C. Schuette  
President, WCC  
PO BOX 25449  
Washington, DC 20375

# THE NORTHWEST CURRE

## Boathouse height stuns C&O commission

By JULIE O'DONOGHUE  
Current Correspondent

The C&O Canal National Historical Park Advisory Commission saw just how tall the Georgetown University boathouse would be during its quarterly meeting last Friday — and the information was not well received.

Unprepared for such a large project, the board members gawked and then grimaced as they watched five large balloons fly high overhead, marking the rooftop of the proposed boathouse.

The commission advises the secretary of interior on matters related to the park.

The National Park Service recently discovered the canal towpath stands at 28 feet above the Capital Crescent Trail — five feet lower than previously reported by a surveyor for Georgetown University. That means that, instead of rising only 4.5 feet above the canal towpath as previously suggested, the proposed boathouse's main rooftop would rise 9.5 feet, making it impossible to see over the building while

See **Boathouse**/Page 35



Bill Petros/The Current

**Yellow and red balloons were used at the site of the proposed Georgetown University boathouse to mark the height of the building.**

## BOATHOUSE

From Page 1

standing on the path. Other parts would rise significantly higher.

Of course, some people don't think there is that much to see at that point on the towpath.

"If you wanted to walk that path right now, you could barely see the river," said Sally Blumenthal, deputy associate regional director of the National Park Service.

But the commissioners were distressed by the change nevertheless.

"I had never expected it would go over the path. It is absolutely horrible," said at-large board member Charles Weir. "As a board member, I was never aware of the big jump in size," he added.

Other board members, like Weir, said they felt as though the commission had been left in the dark — possibly on purpose, they said — about the overall size and scope of the proposed boathouse.

"The commission is feeling misled and misrepresented, and I don't know who to trust to give me the right information," said board member George Lewis, of Frederick, Md.

Several board members expressed support for a smaller boathouse that would not rise above the canal and towpath, but Georgetown resident Ann Satterthwaite said that it might not be so simple.

"The fact is that university boathouses must meet certain federal regulations. With the current federal regulations, the canoe club would be a much larger build-

ing," said Satterthwaite.

Other board members were confused by the flipping of numbers.

The National Park Service entered an agreement with Georgetown University to trade the plot of parkland just north of Key Bridge and the Washington Canoe Club — to be used as a university boathouse — for a university-owned plot further upstream.

But the agreement calls for a 15,000-square-foot boathouse, while the actual size of the proposed project is 18,862 square feet, said John Parsons, associate regional director for the National Park Service.

In one proposal — in 1989 — the size of a potential Georgetown boathouse is listed next to a graphic as 4,000 square feet.

"I don't like to hear different dimensions and different statistics. It is really outrageous," said commission chair and Georgetown resident Sheila Weidenfeld. "It has gotten to a point that this process is flawed."

The new information about the towpath height changes the timeline for the boathouse, said Parsons. "We have to regroup and decide how to reduce the size of the building."

Parsons and Weidenfeld resolved to put together a task force with representatives from the commission, Georgetown University and the National Park Service to work out miscommunications.

The commission will send consulting parties to Parsons' future meetings over the boathouse with other interested parties like the Washington Canoe Club, advisory neighborhood commission, Citizens Association of Georgetown and others.