United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO:

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D.C. Office of Zoning
2003 MAY 23 PM 4:08

Ms. Carol Mitten
Chairperson
D.C. Zoning Commission
441 4th Street, N.W., Suite 210 South
Washington, D.C. 20001

Dear Ms. Mitten:

We are writing as the co-applicant with the Georgetown University in Zoning Case Numbers 02-30 and 02-31. I thought it would be helpful if we provided the Commission some background from our perspective and place this case in the context of other related actions.

The National Park Service (NPS) is quite pleased by the progress we have made in the planning and design for the long-awaited Georgetown Waterfront Park. In 1997 we signed a partnership agreement with the Georgetown Waterfront Park Commission which is chaired by Senator Charles Percy. The Commission has been hard at work with us and the citizens of Georgetown since that time. Through the Commission's efforts, 10 acres stretching from 31st Street to just above Key Bridge, were transferred from the District of Columbia to the NPS for park purposes in 1999. We have been conducting a public planning process for the last year to refine the concept plans that were approved in 1987 for the park when the City Council made the decision to create the park by transferring the land to us.

No community could be more skeptical of change in its public spaces than Georgetown which has fully participated in the development of a good plan for a world class urban park. The design is the creation of landscape architect Ignacio Bunster-Ossa from the highly acclaimed firm of Wallace Roberts and Todd in Philadelphia. The result has been applause and universal praise for the plan. We have received the support of Advisory Neighborhood Commission 2E and are proceeding to achieve other necessary approvals. The development of this park is a private-public partnership wherein the scarce construction funds of the NPS will be augmented by private donations and other public funds. We already have $3.8 million toward our $15 million goal, including $1 million from federal appropriations to the District of Columbia.

A major component of this plan has always been to accommodate the increasingly popular, historical sport of non-motorized boating. Canoeing and skulling have been the signature uses of the Potomac here for over a century and we are committed to supporting those activities.

ZONING COMMISSION
District of Columbia
Case 02-30-31
Exhibit 223

ZONING COMMISSION
District of Columbia
CASE NO.02-30
EXHIBIT NO.223

Participation in scholastic shell racing by college and high schools has expanded significantly in the last 15 years, far exceeding the capacity of our Thompson Boat Center. In anticipation of that expansion, our 1987 plan for the park provided for a boathouse zone from 34th Street just east of Key Bridge to a point 1100 feet upstream from the Bridge and identified four potential sites for new boathouses. This zone was delineated by the National Capital Planning Commission, the Old Georgetown Board, the Commission of Fine Arts, the District of Columbia Historic Preservation Review Board and the C&O Canal National Historic Park Advisory Commission so as to balance the need for urban green space of the new park with the wild nature of the Palisades beyond by clustering the architecture of boathouses on either side of Key Bridge. The concept of expanding this zone east of 34th Street was reviewed during last year and it was determined that this modest urban park between 31st Street and 34th Street should be retained without structures. The boathouse zone includes and complements the Potomac Boat Club and the Washington Canoe Club.

Since Georgetown and George Washington Universities are both housed in Thompson's Boathouse and were desirous of building their own facilities, we began working with them on siting their boathouses within the boathouse zone over 10 years ago. Their move would free up over 50 spaces for the high school programs at Thompson's. The boating community embraces not just university rowers, but public high school teams and individuals who want better use that will be provided by the park. The Commission established a boating subcommittee five years ago which has worked very hard and collegially, despite its own differences, to come together in support of a plan that blends public, private, and university uses.

The only mechanism we have to place a privately owned facility on parkland is a land exchange. We use this authority very seldom and only when a clear public interest is being served. Certainly in this case, boathouses must be on the river to function and we will receive an equal amount of riverfront property in exchange. We have not finalized our exchange with either university.

The Commission will be considering zoning the Georgetown University site at a public hearing on May 19. We have produced the enclosed Fact Sheet about the Georgetown Boathouse for the Commission's information. Mr. John G. Parsons will recuse himself as a member of the Commission and will not participate in the proceedings. The NPS will be represented by Ms. Sally Blumenthal, Deputy Associate Regional Director.

I, of course, am hopeful that you will support this project as a first step in achieving a world class park in place of the current missing link in the Potomac River Park System.

Sincerely,

Terry R. Carlstrom

Regional Director, National Capital Region

Enclosure

FACT SHEET

Georgetown University Boathouse
Land Exchange with the National Park Service

Boathouse demand requires three additional boathouses

1. 1987 Park Plan identified boathouse zone on Waterfront

The 1987 NPS Georgetown Waterfront Plan first established the park concept as approved by NCPC. A major principle of this Plan was to provide for increased non-motorized boating. A collective consensus was developed and contained in the Plan that boathouse construction should be placed in a stretch of the river from 34th Street to a point 1100 feet upstream where boathouses had been located historically.

A subsequent non-motorized boating study in 1989 looked at the zone and determined there were four sites worthy of further consideration. Further studies came to the conclusion that three of the sites were viable and only two were suitable for scholastic rowing. The third site between Key Bridge and the Potomac boathouse is proposed for a concession-operated new boathouse for privately owned single and double shells and rental of canoes and kayaks.

2. Land owned by Georgetown University is buildable for a boathouse with vehicular access along 1 mile of the Capital Crescent Trail

In 1992, Georgetown University acquired a one-acre site for a boathouse from CSX Railroad with a perpetual easement along what is now the Capital Crescent Trail to drive to its site, approximately one-mile upstream from Key Bridge. This conflict of uses would be untenable. Further, the construction of a boathouse this far up into the gorge of Palisades Park would be an unacceptable visual intrusion. Although some speculate that this site in unbuildable, the University is confident that it is engineeringly feasible. The property is zoned C-M-1 because of its prior ownership by the railroad. C-M-1 zoning permits buildings as high as 60 feet with approval by the Zoning Commission.

The University's property 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.

3. There will be no net loss of parkland

The NPS and Georgetown University will be receiving an equivalent amount of land in the exchange. Each parcel is a little over one acre. In addition the NPS will retain an easement over the property restricting it to boathouse use only. Further, the boathouse property will not be fenced and the public will be welcome to pass through the site.

4. Land exchange is seldom used

The land exchange method of acquisition has only been used by the NPS four times in the past 50 years in the District of Columbia. In each case we have received more parkland than we have conveyed because we retain a scenic easement over the lands we convey that restricts the uses to protect the resources and adjacent parkland. These protective covenants are essential to ensure that these lands, which remain within park boundaries, are protected in perpetuity.

5. Boathouse design is handsome, of quality materials and respects the design of existing boathouses

The designers conceived of the building's massing in three parts, in deference to the scale of structures adjacent to the site. Gabled roofs, materials of cedar shingle and stone, and porches and decks link this new boathouse to the boathouse traditions of the past as well as boathouses that currently exist along the Georgetown waterfront. In addition, covered porches, arcades, and traditional detailing provide a residential scale to the building that is also in keeping with the residential scale of other buildings along this portion of the Georgetown waterfront. The project has received extremely favorable reviews by the Historic Preservation Review Board, Old Georgetown Board, Commission of Fine Arts, Georgetown Waterfront Commission, the Georgetown ANC and the C&O Canal National Historical Park Advisory Commission.

Every attempt has been made to control the scale of this building given the Federal Emergency Management Agency (FEMA) requirements for the second floor to be above the 100 year flood elevation, as well as the programmatic requirements of boathouses of this type. The roof ridge of the western wing of the Georgetown Boathouse is only approximately 5 feet taller than the roof elements of the Washington Canoe Club.

Overall, the boathouse is 292 feet long which is only 50 feet longer than Thompson's Boathouse. It is divided into two side buildings are 58 feet deep and a center bay that is 85 feet deep. Thompson's Boathouse has two sections, which are 80 feet and 60 feet deep.

6. Capital Crescent Trail will not be impacted

A separate access to the boathouse will be constructed by the University adjacent to the trail. The Capital Crescent Trail will not be used by Georgetown for access to the boathouse during or after construction. The new 10 foot wide access will only be used to access the boathouse for

fire or rescue, trash pickup and delivering or retrieving boats. Daily vehicular access by staff or students is precluded.

7. The dock will only extend 70 feet out from the shoreline

The dimension that the boat dock will extend into the river depicted on the drawings is approximately 70 feet. The University has little ability to control this dimension. It is a function of the size of the crew shells, the height of the deck grade above the water, and maximum desired slope of the access ramp to ensure that rowers would be able to manage their launches and retrieval of their shells. The river is approximately 1300 feet wide here which is twice as wide as in front of Thompson's Boathouse. This will allow more than adequate space for multiple boat uses.

8. Views from the C&O Canal to the river will only be blocked by the boathouse during winter

Both the C&O Canal towpath and the Capital Crescent Trail pass by this site. Due to vegetation along both routes, the river is only visible from November to April. Thus, the boathouse would block winter views from the towpath and the Capital Crescent Trail for approximately 350 feet. Both of these trails extend approximately four miles along this stretch of the river and have ample opportunity for similar river views.

9. Parking will not be provided at the boathouse

No parking will be provided. All students walk or run to the Thompson's Boat Center currently and that will not change. A 100 car short-term metered public parking lot under the west end of the Whitehurst Freeway is proposed in the park plan.

10. The facility will not be used for social events

The use of the boathouse shall be as a training facility for Georgetown University men and women crew program. As part of Georgetown University's crew team mission, the facility may also be used as a base for rowing clinics, both in the rowing season and during the summer. The University has assured us that they have no plans or desire to use this facility otherwise. They have a conference center (Leavey Center) which is the social center of the University. The Athletic Department currently manages McDonough Gymnasium and Yates Fieldhouse and has been effective in maintaining those facilities as athletic venues and would do the same with the boathouse.

11. Water dependent uses are permitted in the flood plain

The National Park Service has consulted with the U.S. Army Corps of Engineers on this proposal which was found to be dependent upon water access and a location on the shoreline. With respect to Executive Order 11988, the project, while it is located within the floodplain, cannot be

accomplished without use of the floodplain. Under the NPS Regulations published in the Federal Register on May 28, 1980, this action falls within the category of excepted actions, as defined under Section 5(B)(3); therefore, further compliance with Executive Order 11988 is not required.

12. There are no significant wetlands or vegetation on the boathouse site

This site was significantly impacted by the construction of the 96-inch interceptor sewer and the temporary access road for the abandoned Three Sisters Bridge project in the 1960's and still retains those scars.

With respect to Executive Order 11990, the project is within an area designated as wetlands. However, the purpose of the proposal cannot be accomplished without the use of the wetlands. Under the NPS Regulations published in the Federal Register on May 28, 1980, this action falls within the category of excepted actions, as defined under Section 5(B)(3); therefore, further compliance with Executive Order 11988 is not required.

The U.S. Army Corps of Engineers evaluated the boathouse site for wetlands characteristics and came to the following conclusion. "The review indicates that there are no jurisdictional wetlands on the site and the Army Corps of Engineers jurisdiction is confined to that portion of the property fronting the Potomac. Although a small area of the site is a wetland, it is not jurisdictional because the circumstances creating the wetland are not valid causes. That is, the hydrology is the result of the C&O Canal leaking and the 84-inch sewer line acting as a subsurface dam. If either condition were removed, the soil would not have sufficient hydrology to maintain the wetland."

13. 1995 public process concluded that the land exchange is environmentally preferable

The August 1995 environmental assessment was made available for public comment for 45 days. On October 10, 1995, we participated in a public meeting of ANC 2E at which they unanimously approved the exchange agreement. Similarly, the National Capital Planning Commission at their September 8, 1995, meeting approved the land exchange agreement. The D.C. Historic Preservation Review Board concurred in the exchange on October 26, 1995.