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Attn: Carol Mitten
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Suite 210 South
Washington, DC 20001
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June 3, 2003

Re: Case 02-30, Public Hearing scheduled May 19 and continued June 5, 2003

To the Office of Zoning:

Please include this testimony in the record of the public hearing on case 02-30 to be continued on June 5, 2003.

American Whitewater is a national 501.c.3 non-profit. We represent about 80,000 Americans through our membership and club affiliates, including nearly 3,000 boaters in the metropolitan region around Washington, DC. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely.

American Whitewater opposes the application for a W-1, or W-0 map amendment and special exception that would allow Georgetown University to build a boathouse upstream of the Key Bridge. The land is owned by the National Park Service and is slated for exchange with university-owned lands elsewhere. Below are factors we hope the Zoning Commission will consider.

Preservation of open space

Throughout the D.C. metropolitan area, the federal, state, and city governments are preserving green space and undeveloped riverfront with parks and other environmentally sound, community-based uses. The George Washington Parkway, C&O Canal Historic Park, Roosevelt Island, Bladensburg Park and Marina, Kenilworth Marsh, Anacostia Park, East Potomac Park and Hains Point, and Capital Crescent Trail are examples.

The proposed private boathouse and exercise facility would constitute a reversal of this policy by the federal and D.C. governments. The proposed site is surrounded on three sides by national parkland, green space, wetlands, and navigable water.

Switching public land to private use

ZONING COMMISSION
District of Columbia
Case 02-30
Exhibit 256

ZONING COMMISSION
District of Columbia
CASE NO.02-30
EXHIBIT NO.256

On May 19, 2003, 28 former employees of the National Park Service, including seven former park superintendents, wrote to President Bush, saying that "the national parks belong to every American and we are dismayed to see that they are being turned over piece by piece, contract by contract, to well-connected special interests whose foremost concern is maximizing profit and personal gain...."

Allowing Georgetown University to construct a private boathouse for a small but wealthy constituency, and deny use of the facility to the public, would constitute turning over national parkland to well-connected special interests.

Millions of residents and tourists each year enjoy fishing, biking, hiking, boating, and scenic views of the river in the vicinity of the proposed site. To allow a small number of students and faculty to eliminate benefits enjoyed by a large segment of the public would constitute promoting private gain at the expense of the public good.

Ecosystem damage and downstream impacts during floods

Destroying vegetation and wetlands in favor of buildings and manicured lawns hurts the ecosystem and downstream development. The vegetation and wetlands provide natural absorption of floodwaters, helping to reduce the impact of heavy rains on downstream development in Georgetown and Alexandria; habitat for wildlife and aquatic life; and natural filtration of pollutants washing down the banks from Georgetown. Cut grass means more pesticides and herbicides washing into the river.

Science-based national policies encourage the protection and restoration of riparian wetlands and vegetation to provide habitat, control flooding, and reduce water pollution. The National Park Service is tasked with stewardship of public lands, and the city of D.C. is tasked with mitigation of flood damage. The existing use serves both purposes better.

Traffic congestion under the Key Bridge

A major drawback of either zoning with parking or zoning with a parking exemption would be the impact on K Street. Although Georgetown students and faculty may walk or bicycle to the boathouse, visitors would join the throngs of vehicles driving and parking on K Street. Visitors would include people watching the start of a race or joining a celebration after a race, guests at social events, buses carrying teams competing in the races, and boat trailers carrying visiting teams' boats. There is no place along K Street in the vicinity of the Key Bridge to park buses and boat trailers while unloading, nor to turn them around. They may block vehicle access to Jack's Boathouse and the Washington Canoe Club, and impede foot and bicycle access to the Capital Crescent Trail.

Weighing the economic impact

While we cannot deny that Georgetown University's boathouse may represent economic and political gain for the city of D.C., we urge the Zoning Commission to consider the

economic damage of greater flood damage, increased water pollution, and the dissatisfaction of the many public users of the Potomac River and C&O Canal.

Poor views and improper uses

We hope the Zoning Commission will consider the aesthetic value of vegetation and wetlands vs. a massive building on a sliver of riverbank away from other development. The proposed Georgetown boathouse may be architecturally pleasing by itself, but in this location it would dwarf the historic Washington Canoe Club building and tower over walkers and riders on the Capital Crescent Trail/C&O Canal Towpath.

The proposed boathouse includes a large exercise room and rowing tank. Georgetown University has provided no justification for siting an exercise room and rowing tank in the boathouse instead of on campus. These facilities bear no immediate relation to the use of a boathouse, which is normally for storing, launching, and maintaining boats.

Furthermore, users of the river and trail would be subjected to views of people exercising in what is essentially a glass-front gym. While such gyms can be justified in crowded urban development, where they offer indoor exercise in the absence of outdoor opportunities, there is little justification for siting a gym in open space designated for outdoor hiking, biking, fishing, boating, and rowing.

Inadequate public participation

At the May 19 Zoning Commission meeting, members of the Commission, National Park Service, and Georgetown University expressed surprise that opposition had "suddenly" appeared. We were just as surprised that we had not heard about the proposal earlier, before a Washington Post article the previous week brought it to our attention.

American Whitewater has a long history of working on use management and zoning issues on the Potomac. This history is familiar to the Park Service. Since we did not hear about the land exchange and proposed boathouse earlier, we suspect the Environmental Impact Assessment and public involvement process were not adequate to comply with the requirements of the National Environmental Policy Act, which governs the National Park Service actions.

American Whitewater urges the Zoning Commission to weigh these factors when considering the zoning request. We also wish to thank the Zoning Commission for its careful attention to this case and its willingness to hear all views.

Sincerely,

Jason Robertson
Director
American Whitewater