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

Please include this complete testimony in the record of the public hearing on case 02-30. I intend to present a summary of this testimony at the public hearing.

I would like to thank the DC Zoning Commission for taking the time and attention to consider all aspects of this proposal and to hear testimony from a variety of perspectives. There are nine factors I hope the Zoning Commission will consider.

1) Preservation of open space

Throughout the DC metropolitan area, the federal, state, and city governments have worked hard to preserve green space and undeveloped riverfront with parks and other environmentally sound, public uses. These include the George Washington Parkway, C&O Canal Historic Park, Roosevelt Island, Anacostia Park, and proposed Georgetown Waterfront Park.

The proposed private boathouse and exercise facility is not in keeping with this policy of the federal and DC governments. The proposed site is currently green space and undeveloped riverfront set aside for environmentally sound, public use.

The proposal also is not in keeping with DC zoning and planning policy, which, according to testimony by the DC Planning Office at the June 5 hearing, requires riverfront ~~buildings~~ boathouses to be set back at least ~~40~~ 20 feet from the river, presumably to preserve open space and provide environmental protections for the river.

2) Switching public land to private use

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…."

This proposal is another example. Allowing Georgetown University to construct a private boathouse for a small but well-connected constituency, instead of a park or boathouse for the public, constitutes turning over national parkland to private interests.

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Thousands of residents and tourists enjoy fishing, biking, hiking, boating, and scenic views of the river in the open spaces along the river. To eliminate these benefits would constitute promoting private gain at the expense of the public good.

3) Ecosystem damage and downstream impacts during floods

The National Park Service, which is tasked with stewardship of public lands, prepared an environmental assessment which found this parcel of public land to include trees, other vegetation and wetlands. Science-based national policies encourage the protection and restoration of riparian wetlands and vegetation to provide habitat, control flooding, reduce water pollution, and prevent shoreline erosion. Destroying vegetation and wetlands in favor of buildings, lawns, and concrete would hurt the ecosystem and increase the flow of water during floods, threatening downstream development.

Riparian (riverbank) vegetation and wetlands provide habitat for wildlife and aquatic life, including grasses and bushes used as hiding and nesting sites by birds and food for deer, trees used as nesting sites and roosts by birds, and underwater roots used as hiding places by fish, crayfish, and other aquatic organisms.

Riparian vegetation and wetlands provide natural absorption of floodwaters. In this case, they help to reduce the impact of heavy rains on downstream facilities, including public and private boathouses and commercial buildings in Georgetown. The existing, well-rooted vegetation and naturally spongy wetlands absorb floodwater and reduce water flow along the bank. The flow-through design of the boathouse would not reduce water flow. In fact, if the boathouse is surrounded by manicured lawn and pavement, water flow will increase. The old buildings nearby could be threatened by the increased flow.

The vegetation and wetlands provide natural filtration of pollutants such as garbage, road oil and other street chemicals, and pesticides and herbicides from lawns that are washed down the hill toward the riverbank from Georgetown and Canal Road by rain. Cut grass and pavement around the boathouse would mean more of these pollutants, along with new pesticides and herbicides from the boathouse lawn, washing into the river.

The shoreline is at risk of erosion or collapse due to the removal of vegetation and the impact of heavy construction vehicles and other building activity. Shoreline erosion means more sediment washing into the river, and ultimately more dredging required downstream to keep boating channels deep enough for navigation.

The possibility of such impacts from construction on this parcel of land is conspicuously absent from the Park Service's environmental assessment.

4) Traffic congestion under the Key Bridge

A major drawback would be the impact on K Street/Water Street. Although Georgetown students and faculty may walk or bicycle to the boathouse, visitors would need to arrive

by K Street/Water 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 Water Street in the vicinity of the Key Bridge to park buses and boat trailers while unloading, nor to turn them around. They could block vehicle and foot access to the existing buildings, including Jack's Boathouse and the Washington Canoe Club, and to the C&O Canal and Capital Crescent Trails.

Allowing roads and parking on the proposed boathouse site would be disastrous for the environment in addition to increasing vehicle traffic on K Street/Water Street. But allowing an exemption from the zoning requirement to provide on-site parking also creates problems—more foot traffic, more vehicle traffic, more competition for parking, and a large increase in overall congestion.

5) Crowded boating areas

I am one of the many casual boaters on the Potomac River who rent kayaks from the public boathouses or launch their own from the open spaces between boathouses. I paddle at my own pace and stay out of the way of competitive boaters, whether they are rowers, kayakers, or canoeists. The Three Sisters Islands upstream of the Key Bridge is a favorite destination for dozens of casual boaters like me. We mosey around the islands, have picnics on the rocks, and watch birds.

At this time, the Georgetown boaters practice and compete in the broad area downstream of the Key Bridge, and the Washington Canoe Club boaters in the narrow area upstream of the Key Bridge. Both set up buoys to mark their practice and competition lanes, and both expect casual boaters like me to steer clear. There is plenty of open space on either side of the buoys for us to paddle, including clear passage between the two competitive areas to get from docks on the Georgetown side of the river to the Three Sisters upstream and to Roosevelt Island downstream.

If both of these groups are crowded into the narrow section of river upstream of the Key Bridge, and both are launching from docks there and setting up lanes there, I anticipate conflicts and possible collisions between the two groups as well as vastly restricted ability of casual boaters to use the area and get to the Three Sisters. That would be a real disappointment.

Georgetown University claimed in its testimony that use of the river by competitors is restricted to early morning hours. That is not the case. I only paddle after work and on weekends, and I have encountered competitive rowers, followed by motorized support boats and using buoy-marked lanes, many times. The people in the motorized boats have even yelled at me at times to get out of the way. I don't mind this as long as there are plenty of other places for me to go.

6) Poor views

I hope the Zoning Commission will consider the aesthetic value of vegetation and wetlands vs. a tall, long building on this small sliver of riverbank. The proposed Georgetown boathouse may be architecturally pleasing by itself, but in this location it would dwarf the historic building next door and literally tower over walkers and riders only a dozen or so feet away on the Capital Crescent Trail/C&O Canal Towpath. According to the testimony at the June 5 zoning commission hearing, it would also tower over the river itself, within 7 feet of the high water mark, to be exact.

The boathouse is seven times the size of the neighboring Washington Canoe Club and, according to opponents, much, much larger than the building that was on the same parcel of land until the flood of 1936. The footprint of the proposed boathouse is 19,500 square feet, almost four times the size of its nearest neighbor (the canoe club footprint is 5,000 square feet).

The size appears to be partly due to the inclusion of an exercise room and rowing tank. Georgetown University has provided no justification for siting these facilities in the boathouse on the water instead of on the Georgetown campus. The features that are essential in a boathouse are those that make it possible to store, launch, and maintain boats. The strengthening of shoulder and leg muscles in order to row competitively is not an activity that must be performed in the boathouse.

The worst part may be that users of the river and trail would be subjected to views of people exercising in what is essentially a glass-front gym. The thought of paddling along in my kayak watching people exercise instead of birds roosting and ducks swimming is a real turnoff. The "gym" could be sited on campus instead of in an area generally used for outdoor hiking, biking, fishing, boating, rowing, and picnics.

7) Economic impact

While it's possible that Georgetown University's boathouse may represent economic and political gain for the city of D.C. (though they are a tax-exempt entity), I urge the Zoning Commission to consider the economic impact of greater flood damage, increased water pollution, more sediment in boating channels, and the potential dissatisfaction or even loss of public users of the Potomac River and C&O Canal. Those users buy food and drinks, use the bike shops in Georgetown for emergency repairs, park at DC meters and parking lots, use Metro, and buy bait, lures, and fishing rods.

8) Inadequate public participation

At the May 19 Zoning Commission hearing, members of the Commission, National Park Service, and Georgetown University expressed surprise that opposition had "suddenly" appeared. I was just as surprised that I had not heard about the proposal earlier, before the Washington Post brought it to my attention.

I am a hiker, biker, and kayaker, and a member of the Center Hiking Club, Potomac Appalachian Trail Club, Anacostia Watershed Society, and Washington Canoe Club. I

volunteer a lot of time to increasing public interest in the needs of Washington's two rivers. I participate in annual cleanups, I have arranged a naturalist-led kayak tour for the DC Science Writers Association, and I have published two freelance articles on Anacostia River restoration programs. Since I didn't hear about the environmental assessment being prepared on the proposed land exchange in 1995, I suspect the public involvement process was not well publicized and therefore was barely adequate to comply with the public involvement requirements of the National Environmental Policy Act.

9) Age and brevity of environmental assessment

The National Park Service's environmental assessment on the proposed land swap was prepared eight years ago. During that time, vegetation and wildlife have established a stronger foothold on the parcel of land, use of the hiking and biking trails has increased, and the Potomac River has experienced several large floods. I am concerned that the analysis of what the site consists of is outdated.

The environmental assessment barely mentions the possible use of the land for constructing a boathouse, and gives no detail on the potential impacts. Impacts of federal actions that are required by the National Environmental Policy Act to be addressed include environmental factors (such as presence of wildlife and aquatic life, wetlands, flood absorption, and water pollution) and social and economic factors (such as open space, public use, parking and traffic, views, flood protection, and impact on historic structures).

I urge the Zoning Commission to weigh these factors when considering the zoning request. Thank you again for your willingness to hear all views.

Amber L. Jones