Washington Canoe Club
3700 WATER STREET, NW
WASHINGTON, D.C. 20007

7/11/2003

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

RE: Zoning Commission Case 02-30; Washington Canoe Club Response

Dear Ms. Mitten:

Please find below the rebuttal on behalf of the Washington Canoe Club in the matter of Case 02-30. We are hopeful that you will find this information useful in considering the matters before you. I'd like to apologize in advance for the length of this rebuttal. The information in this and other submittals to the Commission has been extensive and I appreciate the effort that you expend on the City's behalf.

In reviewing the testimony and submissions of the both applicants and the proponents, we have repeatedly observed several themes presented in support of the boathouse that are interwoven with mischaracterizations.

We are most concerned with the representation that all the concerned groups and agencies have been kept informed throughout the entire planning process and in many cases reviews and endorsements followed. However, we note that the applicants, many of the proponents and even the DC Office of Planning have or had material misconceptions about many significant aspects of the proposed boathouse in the course these zoning hearings. We believe that the applicants use of inaccurate information, both over the last several years and in the hearing, is central to why WCC believes the Georgetown University Boathouse has had such strong endorsement. The rise of opposition was not the result of a small organization as the applicant's counsel suggested, but rather the systematic gathering of information to dispel misunderstanding about some of the more troublesome aspects of this boathouse. The organizations in opposition represent almost two million members, with a large Washington DC base.

I would like to refer to my letter of 6/19/03 that rebuts the statements made in the Arnold and Porter letter dated 6/16/03.

We will quote testimony given at the 5/19/03, 6/05/03 and 6/19/03 hearings. Additionally we will quote written and pictorial submissions by the applicants. Where multiple witnesses provide substantially similar quotes we have combined them to reduce

ZONING COMMISSION
District of Columbia
Case 02-30
Exhibit 375

ZONING COMMISSION
District of Columbia
CASE NO.02-30
EXHIBIT NO.375

the repetition to the Zoning Commission. We've heard the following arguments in support of this structure:

- ***the boathouse and the equipment it will house are consistent with those of other Universities that GU competes against***
- ***the building is consistent with boathouses in Boston and Philadelphia and is smaller than some on boathouse row***
- ***the boathouse is going to be "within the boathouse zone"***
- ***its size is dictated by the size of the boats (width) and oars (height)***
- ***its size is dictated by the 100 year high water mark***
- ***its size is dictated by Title IX***
- ***its size is dictated by "programmatic requirements"***
- ***the setback is dictated by the sewer line***
- ***it is not giant or out of proportion to WCC and PBC***
- ***it won't be used for social functions***
- ***it can't be any smaller without affecting functionality***
- ***GU's currently owned site a mile upstream is suitable for a boathouse***
- ***the upstream site is of comparable value***
- ***GU has "played by the rules"***
- ***this is the only viable site***
- ***this boathouse is the only solution for the high schools***
- ***current users of the Potomac, CCT and C&O Canal won't be adversely affected by the new river traffic***
- ***the bank of the canal won't be affected an no retaining wall need be built***
- ***the WCC's historic building won't be damaged***
- ***traffic on K street won't be adversely affected***
- ***the WCC provided comments, never objected, and its comments affected the design***
- ***that is has been reviewed extensively***
- ***all rack spaces in the boathouse will be used on a daily basis.***

All of the above are factually in error. Proponents of this boathouse stated all of the above.

- ***The boathouse and the equipment it will house are consistent with the others that GU competes against.***

5/19 Page 109 line 20, Mr. Thompson
5/19 Page 91 line 23 MR. BRANGMAN

and

- ***its consistent with boathouses in Boston and Philadelphia and is smaller than some on boathouse row***
  5/19 Page 153 line 16 Tony Johnston
  6/5 Page 115 Jim Ungerleider

6/5 Frederick Allen
6/5 MR. THOMPSON
6/16 Arnold and Porter letter providing additional information

and

- **...the size of the building is about 30,000 square feet. Although that is on the smaller side of what most Universities are building today—for example, Princeton's facility is quite a bit larger than that...**

10/18/01 Testimony to the CFA, Mr. Brangman

All three of these statements have been repeated over and over again at various forums. How many reviewers, knowing the size of various buildings in Boston and Philadelphia's famous boathouse row internalized this information and then believed the renderings. Renderings that provided little to no sense of accurate scale. GU shared their plans for this structure with us on two occasions. The first of those was the oblique rendering that so badly distorts the sizes of the buildings through careful selection of the aspect angle. Additionally, the drawings shown to us did not have dimensions. We expressed grave concerns and specifically requested the photomontage that showed the building from across the river.

As shown in WCC testimony on 6/19/03 and in the spreadsheet provided on 6/27/03, the GU Boathouse will be the largest on the East Coast. While Princeton's Boathouse is 300 square feet larger, it is only 36' tall. Additionally it is only 280 feet long. Moreover, as indicated it is a "dual use" facility with the US National Team training there. Discussions with rowers that we had were shocked that GU was proposing a boathouse larger ("it couldn't be, ours is ENORMOUS" – Facilities Architect @ Princeton). Additionally, Princeton's Boathouse is built on the 1400 acres that Princeton owns on the north side of Lake Carnegie. Further, 2/3rds of the boathouse is over 100 years old. The addition in 1999 added 13,000 square feet in part because of the US National Team Training Center.

Mr. Johnston indicated that Malta/Vesper in Boathouse Row is larger than the proposed facility. In fact, a site survey indicates that while portions of Vesper are 3 stories, it's less than 40' tall and has less than a 10,000 square footprint. It is substantially smaller than GU's Boathouse.

Further, many University boathouses are built without rowing tanks. Within the EARC is it evenly split between boathouses with and boathouses without. GU often uses Princeton University as an example as their boathouse has a 16 seat rowing tank. Princeton also owns 1,400 acres and didn't need approval, nor was particularly constrained in terms of size by other users and the vigorous concerns of citizens. Many Universities build boathouses of smaller sizes on constrained sites and thus place their rowing tanks on campus. (For examples, see our testimony of 6/19 & 6/27 in particular the spreadsheet.) Georgetown is proposing the largest boathouse with the largest tank in that boathouse. Removal of the tank

would remove some of the artificial requirements that Georgetown has created to justify the enormous structure.

- ***the boathouse is going to be "within the boathouse zone"***

5/19 Page 39 line 9 Alan Brangman
5/19 Page 43 line 12 Sally Blumenthal
6/5 Page 9 line 14 Mr. Lawson
6/5 Page 44 line 4 Mr. Bass
6/5 Page 50 line 1 Mr. Fawcett
6/5 Page 63 line 21 Frank Schlesinger
5/12 Email Letter from John Parsons submitted by WCC on 6/27/03.
6/16 Arnold and Porter letter

According to the Environmental Assessment, the Boathouse Zone ends 1000' above Key Bridge. It is difficult to determine exactly where the GU Boathouse actually ends based on the submission material as the site plan drawing ends just east of WCC. However, using the GU provided aerial photograph and "Plan for the Georgetown Waterfront Park and C&O NHP" site plans provided by GU show the building ending between 1254' and 1310' above Key Bridge. This is well outside the established Georgetown Waterfront Master Plan. It should be noted that the NPS Site plan states that the "Non Motorized Boathouse Zone" extends 1100' above Key Bridge. We have located no documentation showing the Text in the Master Plan reflects the new number on the map. In either case, the Boathouse is either almost totally or significantly outside the established and well understood "Non Motorized Boathouse Zone". Given the interest of NCPC, and the community in maintaining and preserving the C&O Canal NHP west of the GWP (see L Schuette testimony 6/19/03, and 6/27/03) this is a significant problem. The Exchange Agreement references that in the case of substantial hardship the boathouse could extend from the 1100' mark to 1250'. No significant hardship has been demonstrated. GU knew that the WASA 84" sewer line crossed the site when they signed the Exchange Agreement. Moreover, they could only move an additional 36' to the east if they wanted to (12' side set back from their property line).

Additionally, the applicants and the proponents consistently mention the GU Boathouse being in the "Non Motorized Boathouse Zone". This mantra is wrong. The documents clearly show it outside the well-known and long established GWP "Non Motorized Boathouse Zone". Interested persons would have looked at the drawings provided by NPS and on various websites and thought the proposed building must be of reasonable size to fit in the zone. Very few people were aware of the clause allowing the Boathouse zone to be extended. As we stated in our letter of 6/27/03:

"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 farther 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."

- ***its size is dictated by the size of the boats (width) and oars (height)***
  6/5 Page 77 line 1 David Don
  5/19 Page 91 line 23 MR. BRANGMAN
  6/5 Melissa Conradi

As we learned in cross-examination, the boats are 58' to 60' long. Boats being at most 60' long dictate thus the lengths of the boat bays. Any extra length is used for storage and thus as a convenience to Georgetown University. That convenience is very inconvenient to the general public, and should be considered a hardship to the Capital Crescent Trail users and the Washington Canoe Club in particular. The boat bays need not be longer than 64 feet. Reducing the overall length of the boat bays would greatly increase the potential to reduce the size of the building. Mr. Muse indicated (Page 60, 5/19/03) that boat bays come in a set width of 23 feet. The Princeton Boathouse boat bays are 19 feet wide. As the Princeton Boathouse is often mentioned by the applicant as being an exemplarily facility, the boat bays should be the same width. That would also assist in reducing the size of the building.

As we learned in testimony, the oars are 12 feet and 6 inches long. We were told the extra length is to allow the oars to set on the rack. What we learned is that many boathouses, including MIT and University of Pennsylvania use a "pit" to place the butt of the oar into. This allows the boathouse ceiling to be lower. Given the significant impact of the building on views, the building's first floor should have a ceiling at least 2' lower.

It should also be noted once again that according to the 106 MOA the size of the building was supposed to be no larger than 15,000 square foot footprint and under 40 feet tall. Georgetown ignored that restriction. If the DC SHRB reopens the 106 process for the GU Boathouse, we will testify that 15,000 square feet is far larger than can be accommodated and still preserve the historic nature of the area. Additionally, real engineering analysis of the impact of the construction on WCC and the C&O Canal embankment will be requested. To date, no engineering analysis has been produced that shows that neither the C&O Canal nor WCC are at risk from the construction.

Finally the overall height of the building is not dictated by the size of the boats, or the programmatic requirements, but rather a desire to have a tall building of a particular style. Many gyms have 10' ceilings. The "exercise room" on the second floor doesn't need a 20 foot high ceiling. Reducing the overall height of the building to 40' above the mean low tide line would place it in line with WCC, making it more acceptable the community.

- ***its size is dictated by the 100 year high water mark***
  6/5 Page 143 line 5 Line MR. JOHNSON
  5/12 NPS letter from John Parsons
  6/16 Arnold and Porter letter

According to a photograph provided by GU, the floodplain is actually 9 feet on the site. Thus there is no floodplain requirement to place the second floor at 14 feet. This is consistent with WCC experience that the 100-year flood of 1936 was 9 feet above our first floor. The ceiling height on the first floor should be lowered to reduce the impact on the public and Washington Canoe Club.

- ***its size is dictated by Title IX***
  5/19 Page 92 line 24 Mr. Brangman
  5/12 NPS letter from John Parsons
  6/16 Arnold and Porter letter

Title IX requires equal facilities, not equally grandiose facilities. Further, it appears that each locker room has 90 full height lockers. Using shorter lockers could easily increase locker space. What will a rower be storing in his or her locker? They are going to jog down to the boathouse; workout and jog back to campus. Rowing requires no bulky personal equipment (e.g., as a football player would). They won't be storing soiled athletic gear, thus the locker is really just to temporarily secure personal effects while working out. The lockers could be made smaller, just as the boat bays could be made shorter and with lower ceilings.

- ***its size is dictated by "programmatic requirements"***
  5/19 Page 56 Mr. Johnson
  5/19 Page 91 line 15 MR. JOHNSON
  5/19 Page 99 line 10 Mr. Brangman
  5/12 NPS letter from John Parsons

6/16 Arnold and Porter letter – "National Class"

Georgetown University only has 6,000 students, while their competition has as many as five times the number of students. It is not clear what programmatic requirements GU is operating under that require the largest Boathouse on the east coast. The portions of the boathouse that is for boat storage are larger than others – wider, longer and taller. Yet they will be storing fewer boats. The locker rooms are larger, yet in testimony Mr. Johnston stated they would have 130-150 athletes training ("with slightly more in the future"). Thus this program of 130-170 students can't survive with a boathouse that is smaller? As shown in our spreadsheet, the other Universities in the EARC all use less and most have excellent and highly competitive programs. I've been exceedingly reluctant to compare Georgetown's to that of other Universities. It is an accurate statement, however, that there is little correlation between facilities and performance of rowers. Coaching is the key.

- ***the setback is dictated by the narrowness of the lot and the sewer line***
  5/19/03 Mr. Muse, Page 73

Setting back so that the building is not on top of the sewer line would actually simplify construction as opposed to increasing the difficulty. Eliminating the bays perpendicular to the river as well as the rowing tanks would allow a boathouse with the same boat storage as proposed but without the impact on the river or the CCT. The 100' lot size is actually generous compared to some in the EARC. Boston University is built on the site of an older boathouse and is jammed in between a major road and the river. They made the site work without impacting the cyclists that use the sidewalk. MIT has no lot at all.

- ***it is not giant or out of proportion to WCC and PBC***
  6/5 Page 88 line 24 Fred Allen
  6/16 Arnold and Porter letter

Our testimony of 6/19/03 clearly shows what is obvious. The building is monstrous, it is giant and it is grotesquely out of proportion with WCC. Only those who have only seen the public face of this project could believe that it's not giant. That public face is the rendering that GU has on their website. As Mr. Muse indicated (5/19 Page 107 line 7) the photomontage provided additional understanding. That photomontage was created at our request for a December 2002 meeting. Only those who have seen that photo in conjunction with the rendering have an understanding of the building on the site – complete with WCC, C&O Canal Towpath and Washington DC waterfront. How many people would have questioned the size if they had seen that photo? Even now I have rowers telling me that the proposed boathouse isn't much taller than WCC and certainly wouldn't block the view from the C&O Canal. I've taken to carrying the photo in my car.

- ***it won't be used for social functions***
  5/19 Mr. Johnson
  6/16 Arnold and Porter letter
  5/12 NPS email letter

The official GU Hoya Athletic Department Website refers to social events. It is the request of WCC that a zoning order be placed to prohibit social functions.

- ***it can't be any smaller without affecting functionality***

6/19 Arnold and Porter Letter

According to our testimony, boathouses less than 1/3 the size are used by Universities with larger programs. Pieces of the program could and should be placed on Campus to reduce the size of the building. Noted rower and proponent Erik Myers testified (Page 70, line 5 of 6/05/03) "that the tanks can be moved with no impact." Other Universities (USNA) use their Ergs in the boat bays in the winter. Ergometers easily breakdown and can be moved substantial distances quite easily. My pregnant wife moves mine frequently.

- **all rack spaces in the boathouse will be used on a daily basis**

6/16 A&P letter Page 2.

This is in direct contradiction to Tony Johnston's testimony regarding the number of athletes (130-170) and the number of shells currently owed by GU and anticipated. According to the applicants the boathouse will hold 60-80 shells, with between 30 and 36 "8"s in the main three bays alone. Given that 30 "8"s is 240 athletes **simultaneously** rowing, the above statement is contradicted by GU itself.

- ***GU's currently owned site a mile upstream is suitable for a boathouse***

  5/19 Tony Johnston Page 47
  6/16 Arnold and Porter letter
  5/12 NPS email letter

As indicated in our testimony on 6/19/03 and 6/27/03 the site upstream is partially underwater during reasonable river conditions, and is exceedingly narrow. Further, opposition by environmental groups would be most vigorous. Additionally, the boathouse would have to be 32' wide and 600' long to accommodate a 35,500 square foot structure as called out in the Exchange Agreement.

- ***the upstream site is of comparable value, even though it is a "more valuable resource"***

  5/19 Page 84 line 2 Sally Blumenthal

The Environmental Assessment of the land swap is out of date and needs to be redone. Further, NEPA specifically requires a single EIS when closely related actions are to taken in concert with one another. "Proposals or parts of proposals which are related to each other closely enough to be, in effect, a single course of action shall be evaluated in a single impact statement." (40 C.F.R. 1502.4(a)). "Significance cannot be avoided by... breaking it down into small component parts." (40 C.F.R. 1508.27(b)7. It is not clear what makes the upstream portion a more valuable resource. Both are in the region that NCPC stated should remain undeveloped, both are wetlands. Neither were assessed by the DC Bureau of

Environmental Quality as part of the Environmental Assessment, the agency responsible for making such assessments in the District of Columbia.

It is not clear that the lands are of equal value. Testimony provided by Ernie Brooks on 6/19/03 call this into serious question.

- ***GU has "played by the rules"***
  6/5 Bob Braunohler

GU omitted significant information until very late in the process. That information, if know at the time, would have stimulated the opposition you see now. Further, GU provided misleading renderings, both in meetings with us and the various agencies and groups whose support were sought, and on their web site. In direct responses to our inquires about the building's size during the early planning stages we were told that the building would not overwhelm us in any way, that it would be proportional and to scale with the other boathouses west of Key Bridge. In addition, the NPS signed the 106 agreement that called for a footprint of no more than 15,000 square feet and a height of no more than 40 feet. The applicants then changed the size requirements in the exchange agreement to new values. The boathouse zone was similarly extended to provide additional room to accommodate the proposed boathouse without updating the Georgetown Waterfront Park Master Plan.

- ***this is the only viable site***
  5/19 Tony Johnston Page 47

The "strong opposition" at other sites cited by Ms. Blumenthal seems less strong that the opposition at this site. The WCC, CCT and the C&O Canal Park would not be affected at all by building east of the Key Bridge. Concrete would be replaced instead of trees. It is noted that the DC SHRB has elected to perform a 106 review on the Georgetown Waterfront Park. Clearly the impact of boathouses on historic structures will be less East of Key Bridge.

A survey of the four potential boathouse sites located in the GWP indicate that all are viable for boathouses the size of WCC or PBC. Testimony about viability for "scholastic boathouses" is code language for large multi-use structures.

- ***this boathouse is the only solution for the high schools***
  6/5 Page 90 line 8 Mr. Rassmussen

This boathouse will remove 25 of the 112 boats stored at Thompson's. The GW Park needs more boathouses like PBC. Fully functional to be sure, but with an emphasis on boat storage. The proposed GU Boathouse at 33,200 square feet uses almost 200 square feet per athlete. Thompson's Boathouse uses only 11 square feet per athlete.

- ***current users of the Potomac, CCT and C&O Canal won't be adversely affected by the new river traffic***
  5/19 Page 54 line 13 MR. JOHNSON
  5/19 Page 91 line 18 Mr. Brangman

WCC testimony of Mike Harbold, Alexandra Harbold and multiple additional athletes all testified to the issues of changes in river traffic. Potomac River Safety Association guidelines were specifically adopted to reduce the potential for accidents. Those regulations state that rowers will stay 250 meters from shore between WCC and "Hens and Chickens". Placing rowers in that zone is like putting a highway through a playground. Rowers do collide with other craft. I have been crashed into by a rower, after I repeatedly attempted to signal and take evasive action. On afternoon of 6/10/03 a rower collided with a Kayak near the DC shoreline. The relatively inexperienced rower, after seeing the Kayak, took several strokes, which drove it into the kayak. While it was an accident and no one was hurt, it is illustrative of the problems that we attempt to avoid. We submit that we will, in fact, be significantly and adversely impacted.

A&P Letter Page 9 claims that the WCC peak racing season – summer and fall, is the when GU Crew program is not active.

This statement is in direct contradiction to Tony Johnston (5/19/03, Page 56) where he states that they will be teaching and racing. In other words, the period 8/15-11/01 will be the peak season for usage of the GU Boathouse. Obviously this will cause major conflicts on the water.

- ***the bank of the canal won't be affected***
  5/19 Sally Blumenthal
  5/19 Alan Brangman
  5/19 Bill Kiwan, Page 65

The statements regarding the canal embankment are most disturbing. No engineering analysis has been provided to back up these statements that claim the C&O Canal won't be disturbed or that damage will be minimized. In fact the use of Auger Piles virtually guarantees that the embankment is disturbed by the injection of high-pressure grout. Without an engineering study there is no way to know. Likewise the movement of the CCT will require a retaining wall (see WCC testimony of 6/19/03 – photograph of the back of WCC, and GU photos submitted showing the narrowness of the path behind WCC). There is no way to determine the impact on the C&O Canal without an engineering study, a study that has not been done to date.

- ***the WCC's historic building won't be damaged***
  5/19 Alan Brangman

WCC will be damaged. As indicated in our letters to John Parsons (submitted on 6/27/03) and in our testimony of 6/19/03 there is no engineering analysis to back up the statement that the building won't be damaged. There is however, ample precedence to suggest that the building will be severely damaged. That damage could occur during construction and during periods of flood. WCC requested a hydrological study of the impact of the river at flood and the potential impact on WCC. GU and NPS agreed to

perform such a study. To date no engineering analysis has been done, nor was it done during the 106-review process.

- ***vehicular and pedestrian traffic on K street won't be adversely affected***
  5/19 Page 48 line 8 Tony Johnston

Traffic on K Street will be severely impacted by the boat trailers and the increased traffic. There has been no study to suggest otherwise.

- ***the WCC provided comments, never objected, and its comments affected the design***
  6/5 Page 47 line 10, MR. BASS
  6/16 A&P letter

WCC provided ample comments, did object and as indicated the only comment which appears to have been considered was the removal of the BAR from the exercise room. From the beginning this project was presented to WCC as a "fate accompli". WCC was assured at a GW Park Boathouse subcommittee meeting that the building wouldn't overwhelm WCC in anyway. Additionally at each presentation of the GU Boathouse plans, WCC objections were raised. At the December 2002 meeting where the actual size and scope of the building was understood significant objections were raised.

- **the design has been reviewed extensively**

5/12 NPS Email
5/19 Brangman Page 40, line 16
5/19 Blumenthal, Page 43, line 12
5/19 Muse, Page 64, line 11
5/19 Kiwan, Page 65, line 6
5/19 Kiwan, Page 69 line 9

GU claims much has occurred. As indicated in previous testimony and submittals, approvals were given to submittals with inaccurate information. EG, the CFA concept approval (which is not a final design approval). Additionally, there is no Capital Crescent Trail Commission as referred to by Bill Kiwan. The Coalition for the Capital Crescent Trail has stated its opposition, as did the Washington Area Bicycle Association.

The CFA is meeting on July 17th to review the Georgetown Waterfront Park.

According to the head of the C&O Canal Commission the Commission has met three times regarding the GU Boathouse. At the second meeting grave concern was expressed regarding the size of the proposed boathouse. No resolution was passed because the commission was assured it was "a work in progress". At the last meeting, held June 20th a resolution was passed expressing concerning the size and height of the proposed structure.

According to George Harrison, Army Corp of Engineers, Baltimore Office, there has been no approval, or pre-approval of this project. He has received no documentation, or

application. He did walk the site, but that was not approval nor should it be construed as approval or a review. It should be noted that Corp and DC BEQ approval for the permanent pier is required. That pier for the apron is a requirement only because of the extreme size of the structure. Approval for the pier should be required prior to building the structure (GU should not be allowed to create a hardship that then requires a special waiver).

- A&P Page 8 – Shells will need to be towed along the 12' wide access road, shells of visiting teams will unload at the boathouse.

The new Arlington County Boathouse will be sited on the bluff above the GW Parkway in Roslyn, VA. A second pedestrian bridge will be built to allow the rowers to carry their boats over the GW Parkway and down to a dock on the banks of the Potomac. The High School rowers will carry their boats 300 yards on a daily basis. I mention this to rebut the statement that shells will have to be towed on the access road. Shells could easily be carried behind Washington Canoe Club to avoid placing non-"repair and replace" vehicles on the access road. It is not an unreasonable requirement to require athletes to carry their equipement as opposed to driving.

Finally, I'd like to comment on the pictures and diagrams provided by Georgetown University.

- Schematic L-2, option-2 clearly shows a fence with a gate on the eastern edge of the boathouse. This is in direct contradiction to a number of persons testifying that the Boathouse property will be open to the public.

- The site plan schematic shows the service road cutting through the back porch of Washington Canoe Club. This is in direct contradiction to testimony stating that WCC would not be damaged by the GU Boathouse. One would expect that the road wouldn't cut through the building. But this goes to the contention that the design is not complete and that little engineering analysis has been done to support the contention that the Canal embankment will not be affected. Clearly the new service road will be very close to the historic WCC. That service road, which is exceedingly close to WCC (and cutting through apparently) was not part of the 106 Review process, and yet will be where 1000s of trucks go by during construction. Moreover it is where the "repair and replace" service vehicles will travel.

In summary, WCC has still has a number of issues with the proposed GU Boathouse. I want to thank the Commission for their time and effort on this matter.

Very Respectfully,

Lawrence C. Schuette, Ph.D.
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