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July 18, 2003

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

Re: Zoning Commission Case No. 02-30 (Georgetown University Boathouse)

Dear Ms. Mitten:

Enclosed are the Applicant's Rebuttal Statement and architect's revised Boathouse in response to issues raised at the public hearing. Also enclosed is a draft Order for the Commission's consideration. Copies are also being sent to the parties in the case.

Respectfully submitted,
ARNOLD & PORTER

Nathan W. Gross, AICP

Cynthia A. Giordano

cc: Advisory Neighborhood Commission 2E
Washington Canoe Club
Coalition for the Capitol Crescent Trail
C & O Canal Association

ZONING COMMISSION
District of Columbia
Case 02-30
Exhibit 381

ZONING COMMISSION
District of Columbia
CASE NO.02-30
EXHIBIT NO.381

APPLICANT'S REBUTTAL STATEMENT

Zoning Commission Case No. 02-30
Georgetown University Boathouse
July 18, 2003

This document is the Applicant's Rebuttal Statement, organized into 12 sections. Also attached is National Park Service information document submitted to the record at the beginning of the case that answers many of the questions that were later raised by opponents. The following are the issue areas addressed in this statement:

1. Planning and Public Policy
2. Architectural Design, Scale, Revised Design, Setbacks
3. The Land Exchange – Good Environmental and Land Use Policy
4. No Adverse Effect on Use of Capital Crescent Trail
5. Vehicular Access
6. C & O Canal National Historic Park
7. Urban Setting/Open Space Issues
8. Social Functions
9. Other Public Agency Approvals Required
10. Rowing Tank, Exercise Equipment, Training Program
11. Water-Related Issues
12. Miscellaneous

I. PLANNING AND PUBLIC POLICY

- The Georgetown Waterfront Park Plan was developed by the National Park Service ("NPS") in the 1980s as a result of an extensive public planning process. It was approved in 1986 by the National Capital Planning Commission ("NCPC"), Commission of Fine Arts ("CFA"), District of Columbia Historic Preservation Review Board ("HPBR"), Advisory Council on Historic Preservation and the C & O Canal National Historical Park Advisory Commission. Further, it was the basis of the resolution adopted by the Council of the District of Columbia to transfer jurisdiction of 10 acres of District property to the NPS for park purposes.

- The Georgetown Waterfront Park Plan includes a designated boathouse zone that includes the Georgetown University boathouse site. This zone was carefully studied prior to its establishment by NCPC, CFA, HPRB and the C & O Canal National Historical Park Advisory Commission The planning rationale is to cluster architecture of boathouses in the urban context of Key Bridge rather than locating them at many different sites along the river's edge. Thus, this zone, which stretches from 34th Street to the Georgetown site, allows for the collective quality of several boathouses that is greater than that of any individual boathouse.

- This site is the appropriate location for the boathouse because it is consistent with the approved plan for the Georgetown Waterfront Park for the water-dependent use of

boathouses. Furthermore, it is not pristine parkland but rather the historic location of the many boathouses and other buildings that stretched from Key Bridge to Foundry Branch. It has only revegetated since construction activities ceased in the 1970s. The site was significantly altered by the construction of the Dulles interceptor sewer in the 1960s and the start of construction on the Three Sisters Bridge during the same period. The site is the product of a land exchange that fulfills the overall planning goals of the National Park Service.

- The NPS is responsible for providing a variety of visitor experiences in the Georgetown Waterfront Park. Non-motorized boating in the boathouse zone will be accomplished by both private (university, Potomac Boat Club, Washington Canoe Club, and Jack's Boats) and public boathouses. NPS plans to rehabilitate Thompson's Boat Center to serve as a high school scholastic boathouse and will acquire the private townhouses at Key Bridge to provide a site for the construction of a new boathouse for canoes, kayaks, and single and double shells.

Planning Chronology - Summary:

- Planning for Georgetown Waterfront Park began in the early 1980s:
  - NCPC established the boundary of the Georgetown Waterfront Park in 1984;
  - Focus of park is non-motorized boating, which has historically been part of the Georgetown waterfront for nearly a century;
  - Georgetown Waterfront Park plan was approved in 1986 and included a boathouse zone from 34th Street to Georgetown University site;
  - Approved plan clustered architecture around Key Bridge;
  - Plan was approved by NCPC, CFA, and HPRB.

- Planning in 2001-2003:
  - Boathouse zone was re-examined and public consensus reached that it should remain from 34th Street to Georgetown University site;
  - Design concept for park prepared by Wallace Roberts and Todd was accepted by NPS and approved by ANC 2E in early 2003;

- The Washington Canoe Club ("WCC") would have the Zoning Commission and the public believe that all of this detailed planning occurred and WCC was left out of the process, had no knowledge of these matters and has been "surprised" a month before this zoning case. The WCC participated for a short time on the Boathouse Committee of the Georgetown Waterfront Commission, and then dropped out. WCC did not participate in the proceedings before the Old Georgetown Board, Commission of Fine Arts and NCPC; and only minimally in the many, many Georgetown Waterfront Commission meetings. In December 2002 the WCC was given the plans that are now before the Zoning Commission.

In recommending denial of this application, WCC is in effect asking the Zoning Commission to act contrary to 19 years of diligent planning by multiple public agencies and community interests for the Georgetown Waterfront.

II. ARCHITECTURAL DESIGN, SCALE, REVISED DESIGN, SETBACKS

In more than twelve hours of testimony, no one has stated that this is not a handsome building. In fact, many have testified that it is a very handsome building. This testimony fully supports the findings of the ANC, the OGB, and the CFA. The only issue that has been disputed is the size of this proposed building.

The following comments on design and scale are in four parts – exterior design concepts, the program, the proposed revised design and setbacks.

1. Exterior Design Concepts

Rather than locating required functions in one large box, we have divided the new building into five parts (main center body, two side wings and two connecting hyphens). This division, which was applauded by the ANC, OGB, and CFA, allows for the following:

1. Reduction in scale of the overall structure. With a height of 54 feet to the ridge of the center body, 41 feet to the ridge of the side wings, and 32 feet to the ridge of the east entry façade, this massing steps down in deference to the Washington Canoe Club. (Building heights for zoning purposes are lower than the peaks of gabled roofs.)

2. Creation of green public spaces between the side wings and the river. These spaces range from 42 to 55 feet from the river's edge.

3. Creation of a varied and interesting roofline. Gabled roofs incorporate traditional boathouse detailing, hide all mechanical equipment, and allow an interesting roofline when viewed from the C & O Canal above.

2. Program Requirements

Muse Architects have worked to control the size while accommodating the Georgetown University crew program in two ways:

A. Provide minimum number of spaces required for Georgetown to go forward with its crew program.

Georgetown made changes to compromise its initial program for the boathouse by deleting many spaces, including:

- Living quarters for full-time staff member.
- Separate shop for repairing shells (presently combined with storage bay).
- Private offices (presently one shared office).

- Counseling rooms.
- Separate Great Hall and Exercise Rooms (presently combined as one room).

B. Size the three types of required spaces appropriately.

Storage spaces (Boat bays):

- The depth of the boat storage bays is directly related to the storage size requirements by accommodating the following:
- Three feet of storage at edge of bay
- Five feet of circulation (also means of egress circulation)
- Sixty-two feet of shell storage
- Five feet of circulation (also means of egress circulation)
- Three feet of storage at edge of bay.

The height of these bays is directly related to the storage system for the shells, as well as the storage systems for the oars (more than 14 feet long).

It is critical that the new boathouse be sized to fully respond to these storage needs. Should these sizes be reduced, all storage would not be accommodated on the interior of the new building. This would lead to unsightly exterior storage, and for security, an exterior fence. An example of this can be found at Thompson's Boathouse where the building was undersized for eventual storage needs, requiring an outdoor storage area about equal in area to the building gross floor area. This arrangement is seen at the Washington Canoe Club as well, where it disallows public access to the waterfront and has many boats stored outside.

Training spaces (Exercise room and Rowing tank)

While the Georgetown program has 180 athletes, the exercise room only accommodates 47 ergometer exercise machines. The space containing the rowing tank is as small as possible to accommodate 24 rowers.

Support spaces (Locker rooms)

In full compliance with Title IX, the locker rooms are sized to accommodate 90 men and 90 women. Many boathouses constructed prior to 1972, when Title IX was adopted, are substantially smaller, due to the inequalities of men's and women's programs and associated support spaces.

The combination of these three types of program spaces results in a new building of 33,000 gross square feet, and 22,737 net square feet. *It is important to note that the WCC chart comparing the sizes of collegiate boathouses listed many buildings' net square feet and did not always include second boathouses constructed by some of the schools.*

In comparing the size of the new Georgetown boathouse with other facilities, it is also important to note that the only relevant programs are those with as many crew squads as Georgetown. (See discussion below under 4.)

3. ***Revised Design.***

In response to feedback from the Office of Planning, we have proposed the following revisions:

A. Height Reduction. By reducing the wall height on the upper floor and by reducing the roof pitches of the center body and side wings, we are proposing to reduce the overall height by three feet.

- As a result, the peak of the central core building extends only 18 feet above the level of the C & O Canal Towpath rather than 21 feet. This is only at a single point with sloping sides, of course, so that there will be river and long distance views around the roof peak. And, persons on the tow path tend to be moving along on bicycles, walking or jogging, so that the interruption in view will be brief.

- The ridge of the side wings will be 4 feet 6 inches above the level of the tow path rather than 7'6". A person walking or bicycling will be typically five feet or more above the tow path with better river and distance views than before.

B. Rowing Tank, Length of Building. By reducing the number of stations in the Rowing Tank from 24 to 20, we are proposing to reduce the overall length of the building by 11' 8", from 292 to 280' 4". The building's footprint is also reduced by 675 s.f. The Georgetown University boathouse is thus only 40 feet longer than Thompson's boathouse, which also has a very large outdoor storage area. Thompson's is divided into two sections, which are 80 feet and 60 feet deep. The side buildings in the Georgetown University Boathouse are 58 feet deep and the center core is 85 feet deep. Overall, Thompson's boathouse has 25,371 gross square feet of floor area, plus 20,140 s.f. in the outdoor storage area, for a total of 45,511 gross square feet, which is substantially greater than the 32,300 gross square feet in the proposed Georgetown University boathouse.

The Washington Canoe Club building is approximately 143 feet long, with a boat rack at the eastern end that extends another 22 feet. West of the boathouse three outside boat racks extend 50 feet, and the remaining 33 feet inside the fence is filled with boat trailers and boats stacked on the ground. Thus, the length of WCC's boat-related use along the Capital Crescent Trail is 248 feet, not so different from GU's 280 feet, with the disadvantage of outdoor storage and vehicle parking at WCC.

4. ***Waterfront Setback.***

- The principal intent of the setback in the W-0 zone is to allow public access to the waterfront. The setback cannot be too great without impeding the simple object of storing boats near where they are used. In this regard, the setback from the riverfront of 15 feet at ground level is reasonable, especially since the boat deck extends over

the water and effectively increases the front yard. *It is noteworthy that the Applicant applied for the W-1 zone district, in which there is no specified waterfront setback.*

- More importantly for purposes of public access and green space, the side wings are set back 42 to 55 feet from the water's edge. This constitutes a very large setback and major public amenity space, as the wings are approximately two-thirds of the length of the building. Perhaps undue focus has been placed on the setback of the central core building only.

- The Applicant would prefer to retain the porch overhang as an integral part of the architectural design, and because we are not aware of any reason to change it. If the issue (whether at ground level or the porch level) is alleged blockage of views from WCC to points upriver, we note that the cove that the GU boathouse will be sited on provides an additional visual setback that preserves most of WCC's views.

- The setback from the Capital Crescent Trail is ample. Proceeding from the trail to the boathouse, the bike trail is 10 feet wide, followed by a grass strip that is three feet wide, then the 12-foot-wide access road. Finally, the building is set back 5 to 8 feet from the access road.

III. THE LAND EXCHANGE – GOOD ENVIRONMENTAL AND LAND USE PLANNING

The Washington Canoe Club suggests that comparative real estate appraisals of the existing Georgetown University site in the Potomac Palisades and the proposed site be done. As part of its requirements for conducting land exchanges, the National Park Service appraised both parcels in 1992 and they are of equal fair market value.

The Georgetown University-owned site is zoned for commercial and manufacturing uses (C-M-1) to a density of 3.0 FAR and comes with dedicated vehicular access for one mile on the Capital Crescent Trail.

The relevant issue, however, is not monetary value, but environmental and open space benefit to the public. As official documents in the record of this case verify, the Palisades site is rated as high-quality wetlands with significant and valuable plant and wild life. The NPS "Fact Sheet" that is in the zoning record states on p. 3:

> *The [Palisades] 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.*

The proposed Georgetown University boathouse site, by contrast, has no significant wetlands, vegetation or wildlife. The site is the product of landfill. This site was also radically disturbed in 1969 when the Dulles interceptor sewer line (seven feet in diameter) was placed below grade. Rather than building on undisturbed parkland, it is more appropriate to build on a site that has been greatly disturbed in the past. Presently, the disturbed nature of this site is not conducive to access to the waterfront. This access will be greatly improved with the new boathouse site design. Moreover, an access road was constructed on the site in the 1970s in connection with the start of construction of the Three Sisters Bridge. The only reason the site is a wetlands is that the sewer main traps some water that seeps down from the C & O Canal. The National Park Service states:

> *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 [limited] populations of small mammals such as rabbit, squirrel and raccoon . . .Soil compaction from the use of the site as a parking area has increased the likelihood of storm water runoff and soil sedimentation into the Potomac River.* [Emphasis added.]

In short, the land exchange results in the public obtaining a valuable piece of natural open space in an important location, and eliminates as well the undesirable potential for a mile-long vehicular roadway alongside the Capital Crescent Trail. The urban, compromised site is designated to be improved with a boathouse in the designated boathouse zone of the Georgetown Waterfront Plan. This boathouse will help carry out long-term NPS plans for a boathouse row on this section of the Potomac River.

IV. NO ADVERSE EFFECT ON USE OF CAPITAL CRESCENT TRAIL

The Capital Crescent Trail Association and a few other opponents state that the Georgetown University Boathouse will somehow block or impinge upon the use of the trail. There is no reason for this to be true. The asphalt bike trail is 10 feet wide. It will continue to be 10 feet wide after being partially relocated by a few feet. The boathouse has its own 12-foot-wide access road, separated by a three-foot planting strip from the bike trail, and the boathouse is further set back 5 to 8 feet from the access road. There is no reason to believe users of the GU boathouse will get in the way of users of the trail -- any more than WCC members currently obstruct the trail. Spectators near Thompson's Boathouse do not obstruct the bikers, walkers and roller-bladers who pass by that location on the trail. The Applicants are committed to working with the key organizations involved in the Trail and the trail designers to ensure that the minor relocation is as well planned as possible. In particular, the curve where the trail is moved a few feet to the north should be a gradual curve, more gradual than the preliminary drawing currently being reviewed. There will be a short construction period for the relocated trail, but access will be maintained by a parallel temporary trail for this short section. The parameters of the shared use of the former CSX right-of-way have been stipulated by the National Park Service, the steward and manager of the Capital Crescent Trail, in consideration of the right of access over the Trail owned by Georgetown University.

V. VEHICULAR ACCESS

The Applicant's team discussed all aspects of vehicular access and parking with staff of the D.C. Department of Transportation ("DDOT"). DDOT's report to the Zoning Commission approved the plans, including absence of parking, the parking management plan for regattas, the access road, the turnaround area on site and the emergency access plan. Public parking is available on K Street when needed, and since 1986, the NPS plan for the Georgetown Waterfront Park plan has included the construction of a 100± car parking lot in the K Street right-of-way between 34th Street and the Washington Aqueduct. A turn-around will be constructed beneath Key Bridge and upon completion of the park, no private vehicular access or parking will be permitted upstream of the Washington Aqueduct, except for emergency and service vehicles or boat trailers accessing the Georgetown University Boathouse or the Washington Canoe Club.

The OP Supplemental report dated June 27, 2003 states:

> *The Zoning Commission requested that the DDOT further comment on potential conflicts between parking and buses for the drop-off of boathouse users on the end of K Street NW. The DDOT advises that the issue of bus and emergency vehicle turn around at the end of the street was reviewed in relation to the Georgetown Waterfront Park plan, and it was determined that there is sufficient room available. Small buses and larger emergency vehicles would be able to safely and conveniently turn around at this location. The service road would permit the turn around of boat trailers and emergency vehicles on the G.U. boathouse site. The applicant further advises that bus drop-off for special events would not be common, and would often be done at Thompson's Boathouse (as is currently the case), where boat races would normally end.* (Page 2.)

WCC requests a DDOT study. DDOT has already analyzed the situation for this zoning case and recommended approval of the project. As stated above, DDOT also analyzed the access issues related to the entire Georgetown Waterfront Park planning and approved the plans. WCC states unequivocally that there is a degree of congestion at its own regattas. Isn't that part of the idea – the excitement of the races, the friends, family and spectators cheering on the teams? Most interesting, exciting events are bound to create a degree of congestion. People convene at special places all over the city – for recreation, worship, special musical and sporting events. Such gatherings are temporary. Regattas do not attract the large crowds of spectators that some other sports do, and the Georgetown waterfront is already an appealing, animated space on weekends, when most regattas will occur. The people who use the Georgetown waterfront on a Saturday afternoon are much more likely to be pleased to see a regatta than dismayed.

The Applicants believe the issues related to vehicular access are fully resolved.

VI. C & O CANAL NATIONAL HISTORIC PARK

The opposing parties object that the boathouse site may extend slightly into the C & O National Historic Park, but the National Park Service and the Commission of Fine Arts are the relevant decision makers regarding the use and design of buildings in this Park, and they whole-heartedly approve the boathouse. Both the D.C. State Historic Preservation Office and the federal Advisory Council on Historic Preservation approved the Georgetown Waterfront Plan inclusive of the boathouse zone. The MOA under the Section 106 historic preservation review calls for and allows consultations between the Park Service and other parties to adjust the specific boundaries of the boathouse site.

As to the allegation that the plans were a "surprise" to WCC, the Applicant followed normal agency review procedures, submitting scaled drawings to the Commission of Fine Arts and other design review agencies. These were reviewed by architects on the CFA staff as well as members of the Commission. There is no reason to believe that the CFA did not consider questions of scale. None of the opposing parties in the zoning case participated in the CFA case.

As to the temporary blockage of the view of the river by walkers and bikers on the Capital Crescent Trail, the length of the Washington Canoe Club building plus outdoor boat storage and automobile parking areas is nearly the same size as the Georgetown Boathouse.

Opponents suggested locating the boathouse to the east of 34th Street. As members of the Georgetown Waterfront Commission stated in testimony, the designated parkland for the waterfront there will feature an open landscape park free of buildings so as to maximize public use. A boathouse in that location would simply remove other park land from those public uses provided for by the approved Georgetown Waterfront Park plan and is unacceptable to the public and the NPS. In contrast, the designated boathouse site has been designated for this purpose since 1986. The only developable privately-owned site east of 34th Street is presently under development for the Embassy of Sweden.

Use of the former Dempsey's boathouse site, which is located between the Washington Canoe Club and the Aqueduct, has been suggested. The NPS 1989 Non-Motorized Boathouse Study identified this site as a potential boathouse site, but subsequent evaluation of the site concluded that it was too small for any collegiate rowing facility. Construction is not allowed too close to the Aqueduct Bridge, and the sewer vault imposes constraints as well.

The WCC complains about the proposed use of former public park land for a private recreational use. The WCC itself occupies federal parkland and is a private organization with a chain link fence around its property that keeps the public off of federal park land. It also continually parks motor vehicles on the property that compact the soil and leach chemical residues into the Potomac. The public will have unimpeded access to the waterfront around the Georgetown University boathouse structure. (The fence referred to

in WCC's rebuttal statement was simply around the entranceway in an early set of plans. It is no longer in the plans.)

WCC's objection that the Georgetown University boathouse will block its views to the west up the river is incorrect. The Georgetown University site is in a cove that provides a natural setback that substantially or entirely preserves WCC's views up the river.

VII. URBAN SETTING/OPEN SPACE ISSUES

WCC asserts that the subject site is "the start of an area away from the urban setting and where buildings are no longer 'normal', implying that the site should remain open space. The Georgetown University boathouse will be the last building at this edge of the Georgetown waterfront. That is the result intended by all of the waterfront and boathouse planning over the past 19 years.

The Georgetown boathouse will be appealing to look at from the Capital Crescent Trail as architecture, as a point of activity and interest, and as a use that clearly belongs on the waterfront. It will be the western end of the boathouse row concept in the approved Georgetown Waterfront Park Plan. This is an urban setting where buildings along the tow path and bike trail are normal, expected and interesting. Historic buildings are also a positive part of the setting of the canal in Harper's Ferry, a number of historic towns in Maryland and its terminus in Cumberland, Maryland. The great length of the C & O Canal will continue to be almost entirely in a rural or forested setting. Historically, this entire section of the Potomac riverfront has accommodated many buildings, including boathouses no longer present.

The opponents make an assumption that the boathouse site is designated to remain natural open space, or "wild" space. This is a false assumption. The Comprehensive Plan indicates "Parks, Recreation and Open Space" on the Generalized Land Use Map. Both Parks and Recreation imply active uses, not simply vegetation and open space. The more detailed public plan -- the Georgetown Waterfront Plan -- specifically designates the site for a boathouse. If absolute maintenance of grass, trees and views of the river is the goal, no building can pass muster. However, the adopted goal of the District of Columbia and Federal governments, as well as the local participants in the Georgetown Waterfront Park Commission, is the construction of a boathouse on the site.

Roger K. Lewis, a practicing architect who writes an architecture and urban planning column for the *Washington Post*, commented on the passive versus active open space issue in his "Shaping the City" article on June 28, 2003. He strongly supported approval of the Georgetown University boathouse, in part because of the following statement:

> *Having visited the boathouse zone, boated on the river, walked the towpath and driven hundreds of times on Canal Road, the Whitehurst Freeway and Key Bridge, I too am unconvinced of the opposition's arguments. The Potomac is more than wide enough, the shoreline topography steep enough and the vegetation thick enough to ensure a comfortable fit between building and landscape.*

The District has no shortage of riverfront parkland. In fact, Washington's Potomac River shoreline needs more waterfront destinations and activities, not more passive park space. If a flaw exists in what is being proposed along the Georgetown waterfront, it is the modest amount of proposed new recreational, cultural and commercial uses that can be integrated with waterfront parks and promenades.

Building new boathouses makes great sense. But I would like them better if they had rooftop cafes or restaurants with magnificent views of the river. (*Post,* p. F8)

VIII. SOCIAL FUNCTIONS

The WCC expresses concerns about possible social functions at Georgetown University's proposed boathouse, but conducts social functions at its own boathouse in an unregulated fashion. In that no one is living or even working nearby, an occasional gathering of team members and/or crew alumni at the Georgetown boathouse will bother absolutely no one and need not be regulated in a zoning order. The other boathouses along the Potomac are either matter-of-right uses under W zoning or under lease, with no specific restrictions on gatherings of people. Unlike some of the boathouses in Philadelphia's boathouse row, Georgetown will not rent out the boathouse for functions. Folding up ergonomic equipment to create space for a social function is not so easy, nor is it practical. In any case, the Georgetown crew program holds its special events at the Leavey Center, which is well designed for such purposes. Regarding the fireplace, it is traditional in boathouses, as reflected by the fireplaces in the WCC boathouse and the Potomac Boat Club.

IX. OTHER PUBLIC AGENCY APPROVALS REQUIRED

As the Zoning Commission is aware, several public agency approvals in addition to zoning have been and will be required in order for the Georgetown University boathouse to be constructed. These include the Commission of Fine Arts and Old Georgetown Board, environmental reviews and historic preservation.

Commission of Fine Arts. The design was highly praised in approvals by the Old Georgetown Board and the Commission of Fine Arts in 2001, with favorable concurrent review by the D.C. Historic Preservation Review Board as well. The project will return to the Commission of Fine Arts for final design approval.

Environmental Reviews. A Federal Environmental Assessment under the National Environmental Protection Act ("NEPA") was completed in 1995 with regard to the proposed land exchange for the boathouse. That analysis resulted in a "finding of no significant impact", so a more detailed Environmental Impact Statement ("EIS") was not required. The National Park Service has noted that additional federal environmental review under NEPA is not anticipated, but review of specific construction issues at the building permit stage by both Federal and District agencies will be required.

The Army Corps of Engineers determined that there are no qualifying wetlands on the site or habitats that will be disturbed by the introduction of the building on this site. The Army Corps has also reviewed and provided design guidelines for the proposed stone rip rap shore stabilization along the river, as well as the dock design.

The project will undergo the District of Columbia's Environmental Review process during the building permit process. Under the D.C. Environmental Protection Act of 1989, an Environmental Impact Screening Form ("EISF") is required for any proposal with a value of greater than $1 million. The EISF includes comments from several District departments regarding potential environmental impacts and whether a more detailed EIS is needed. A full EIS is unusual because an applicant is usually able to address concerns without the need for an EIS. In a memo dated May 14, 2003, the D.C Department of Health, Bureau of Environmental Quality expressed a preliminary opinion that an EIS may be required, but the formal building permit process has not yet begun.

Historic Preservation. The site is located at the southern end of the extensive C & O Canal National Historic Park, which was created in 1971. Because it is also located in the Old Georgetown Historic District, the U. S. Commission of Fine Arts and the District of Columbia Historic Preservation Office ("HPO") must review any required construction permits. Normal HPO procedure with Old Georgetown Historic District cases is for the CFA to conduct the principal hearings (now completed), with the HPO commenting during the process.

The National Park Service, Old Georgetown Board, Commission of Fine Arts, National Capitol Planning Commission and the C & O Canal National Historical Park Advisory Commission have approved the boathouse zone. Although the C & O Canal National Historic Park Advisory Commission has approved the boathouse site, it has expressed concerns about the height and length of the proposal as it affects views from the towpath.

Because the Property is currently federally owned, federal review under Section 106 of the National Historic Preservation Act of 1966 ("NHPA") is required. The responsible Federal agency must determine whether its actions could adversely affect historic properties, perform studies as necessary and consult with all affected agencies and parties, including the State Historic Preservation Officer ("SHPO"). The Section 106 process usually results in a Memorandum of Agreement ("MOA"), which outlines agreed-upon measures that the agency will take to avoid, minimize, or mitigate potential adverse effects.

Commenting on the conceptual Georgetown Waterfront Plan in 1986, the SHPO stated that the "conceptual master plan will have no adverse effect on the qualities of significance for which the Georgetown Historic District was listed on the National Register, provided that the location and design of the Boathouse (Element 14) be reviewed for site and design."

In 1995 the Historic Preservation Review Board ("HPRB"), acting in its role as a State Advisory Board, concluded that the proposed land transfer to provide a boathouse site could potentially have adverse effects on historic resources and recommended that an

MOA be prepared and that the HPO staff will review preliminary and final building plans.

Section 106 Memorandum of Agreement – Building Footprint. An MOA was signed in 1997, and the project complies with the conditions therein. One condition that was questioned in the zoning hearing is whether the boathouse is limited to a maximum footprint of 15,000 square feet. The Applicant responds that Stipulation a. regarding the footprint (not more than 15,000 square feet) and height (40 feet above grade) is only one condition and must be taken together with stipulations c. and d. which require the NPS and Georgetown University to work cooperatively to adopt a boathouse design agreeable to both and that prior to submission to the approval authorities, the NPS shall approve the design. The NPS has approved the design and on behalf of Georgetown University submitted it to both the Zoning Commission and the Commission of Fine Arts.

Design review in the Old Georgetown Historic District is primarily the responsibility of the Commission of Fine Arts, which granted Concept Design Approval on October 18, 2001. The CFA will also be responsible for Final Design approval, with the HPO staff also reviewing the final design plans.

X. ROWING TANK, EXERCISE EQUIPMENT, TRAINING PROGRAM

Some opposition testimony suggested relocating the rowing tank and the exercise machines to the campus so as to reduce the size of the building. There are several reasons, summarized below, for having a complete boathouse of a collegiate standard. These summary points are followed by a more complete explanation under the headings, "Boathouse Program" and "Boathouses – Evolution and Comparisons."

- Training requires a complete workout, typically instruction and practice in the rowing tank and on the rowing machines, as well as paddling in the river. Coaches supervise and instruct the athletes in the tank and at the machines. Since 75% of GU's rowers begin as novices, training is critical.

- These student athletes already devote significant amounts of time to the sport. Their workouts must be efficient so they have time to complete their studies. Efficient use of the coaches' time is also important: it is impractical to have some training sessions on campus and some at the boathouse because the coaches can't be in two places at once.

- The tank and machines are used year-round by a significant number of participants – approximately 180 on two men's and two women's teams.

- Thompson's Boathouse and the Potomac Boat Club both have exercise equipment, which is a normal part of a crew workout.

- If the rowing tank (on the ground floor) were relocated, the women's locker room above could still not be moved to the ground floor because it must remain above the 100-year flood level, which is 9 feet above the first floor elevation.

Boathouse program

The program for the boathouse is driven by the requirements of teaching and training crews to row and to prepare them to race. While rowing on the water is the primary way to learn to row and to train, we also use the rowing machine (the ergometer), and rowing in the tanks to help to teach and train the crews. All of the training is aimed to raise the standard of the individual rower and the squad, to produce the fastest crews that we can.

Most of the rowers that will race for Georgetown come to us with no previous experience. We start each school year with many novices, all who need to be taught the fundamentals of rowing, they need to be trained to be fit athletes, and they need to be developed into cohesive crews. It is unique in rowing, that we can take novice, college age athletes and teach them to perform at the highest levels of our sport in a relatively short period of time. Year after year this happens. There are numerous rowers who begin the sport in college, who will become collegiate champions, and go on to national teams as well.

Rowing involves the simple execution of one stroke that takes less than two seconds, and then repeating the motion again and again. Technically, we work on the refinement of that one stroke throughout the school year. We drill, we work on one part of the stroke at a time, and we work at different speeds and intensity. And obviously we work to get the entire crew to execute as one. All of this is to say that there is a large teaching component involved in rowing. Rowing on the water, rowing in a tank, and rowing on the ergometer all are means that we have at our disposal to try to do a better job of teaching and coaching. In addition to working on the technical aspects of rowing, coaching rowing involves teaching and training the rowers to be more powerful, to be fitter and stronger and faster. Again, rowing on the water is the primary means to do this. But the ergometer and the rowing tanks are all mediums that rowing coaches use to teach and refine the rowing stroke, as well as rowing on the water.

On a given day any one squad might warm up first on the ergometer and then go out on the water. Perhaps the coach will go first to the rowing tank and demonstrate a particular technical point that he or she wants to work on before the squad goes out in the shells. Or the coach might take an individual athlete into the tank to work on part of their rowing stroke after the practice on the water. Also on a given day a squad may have an uneven number of rowers at practice, so perhaps part of the squad will warm up on the ergometers or in the tank while the rest of the squad goes on the water, and then rowers will switch places part way through practice. We sometimes use assistant coaches so that one coach might stay on land with one group of athletes while the other coach goes on the water with the rest of the squad. Keep in mind that at Georgetown we have eight squads (men and women's varsity and freshmen, heavyweight and lightweight), in our total program.

From all of this it is clear that, if all of the training tools are together, the result is a much better teaching and training environment.

Boathouses – Evolution and Comparisons

Prior to 1960 a typical university boathouse included shell storage bays, a shop area and locker room space. At that time there were no competitive programs for women. A few schools had space for rowing machines, or other exercise space, and only one had rowing tanks in the boathouse. Several universities had full time employees working in the boathouse to build or maintain the shells and other equipment, and to take care of the facility. Generally there was one boat bay, or "shop", dedicated for the use of the boatman.

During the 1970's the larger university programs added varsity women's crew. Women's crew became a varsity sport at Georgetown in 1978. By the 1980's the individual rowing machine, the ergometer, became a regular part of the training regime. As the ergometer developed it became relatively inexpensive and the accuracy of measuring the work output improved dramatically. Schools went to having a handful of units to 50 to 60 or more. The ergometer has become a standard teaching and testing device used by rowers world wide.

Today crews train throughout the school year on the water, in rowing tanks and on the ergometer. The ideal training and teaching situation is to have all of the parts of the training program in one location. Coaches and rowers will often use more than one medium in a given practice session.

It is worth noting that of all of the universities with whom Georgetown University regularly competes, only Harvard had adequate space in their two boathouses, with minor adaptation, for the changes that occurred in rowing over the past 30 years. In the 1970's Harvard built a second rowing tank, one with faster "moving" moving water. That is the only change they made. All of the other universities with whom Georgetown competes had to build new facilities, or renovate, to satisfy gender equity (Title IX) issues and to provide adequate training areas for their crews or shell storage bays, or in some cases, both. Some universities, Columbia, Wisconsin, Cornell and Rutgers are still involved in that process.

It is also worth noting that no university with whom Georgetown University competes stores rowing shells outside.

It should be no surprise that the size of the rowing program directly influences the needs in the boathouse. Only three of the universities that Georgetown University competes with have comparable sized rowing programs. They are Harvard, Princeton and Wisconsin.[1] The remaining schools all have fewer varsity and freshmen squads than Georgetown. The total enrollment of a college or university is irrelevant information.

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[1] See the data chart on the following page.

SCHOOL	YEAR	RENOVATED	SQ. FOOTAGE	# OF BAYS	# SQUADS	ERG AREA	TANKS	NOTES
HARVARD-MEN	1900		20,640 gross	5	4	YES	YES - 2	
HARVARD-WOMEN	1906		approx 20,000 gr	6	3	YES	use @men's	
HARVARD-COMBINED			40,640 plus	11	7		YES	
PRINCETON	2000		34,000 gross	8	8	YES	YES	Renovated old boathouse and added on to answer gender equity issues and for additional training
WISCONSIN-NEW		1997	52,000	6	6	YES	YES	Current boathouse built in 1967, inadequate for current training purposes and gender equity.
GEORGETOWN			32,300 gross	5	8			
Only Princeton, Harvard, Wisconsin and Georgetown field regular women's lightweight varsity squads								
Those schools with boathouses well removed from campus developed training space (tanks, weight room, etc.) on campus. Yale, Syracuse, Penn, Cornell								
Boston Univerity, Rutgers, Northeastern all developed training areas on campus (including tanks) at a time when they could not do so in the boahouse.								
thompson's			25,371 gross	10		YES - 2	NO	
thompson's outdoor			20,140 gross	??				
		total	45,511					

We planned a boathouse to accommodate eight squads, four for men and four for women, which will answer the needs for Georgetown crew today and for generations to come.

XI. WATER-RELATED ISSUES

The Applicants emphasize that the original submission we put in the record at the first hearing is a workable plan. During the course of the three hearings there were several water-related issues that were brought up. In summary they were:

1) Shell traffic coming and going to the Georgetown dock
2) Potential safety issues and conflicts between canoers and rowers
3) Race course issues
4) Practice lanes for WCC.

Each of these issues can easily be resolved, as has been stated (with some exceptions) by WCC. All that is required is some cooperation and common courtesy.

1) Shells coming and going from any launch area where there is potential cross traffic from others must be careful. Locally that is especially true at Thompson's Boat Center where the conditions are potentially far more dangerous than they will be at the proposed new Georgetown site. Every day at Thompson's crews leaving the dock must be alert for shells that are rowing right on through, either upstream or down stream, crews that are turning to go down stream, and crews that are landing. In addition Thompson's is located on a bend of the river where boaters often cut the corner both to go on past but also to return to the dock. Everyone at Thompson's learns to be careful in this area, to proceed with caution, and to be courteous.

Similar situations exist at many other rowing sites, most notably in Philadelphia where the rowing lanes in and out of the many boathouses in boathouse row are extremely narrow, and shells have to cross lanes in order to clear the docks.

Crews leaving the Georgetown dock will need to learn not to stop in the lanes used by the canoers when they leave the dock. Our shells will have to check to see that it is clear, that no one is approaching from either direction, then to shove off and row out to the normal practice lanes for the rowers. That is the normal procedure for us now at Thompson's. It is just adjusting to a slightly different situation. *We are prepared to mark with a line of buoys, the line between the canoers' and rowers' practice areas.* Crews returning to our dock will need to be sure that the area is clear, not only of canoers, but also of shells leaving the Potomac dock, before they land.

All that is needed at our new location is for everyone to be courteous, to respect those that have the right of way, or are in the middle of a workout, or a race, and to proceed with caution. We teach our crews to follow basic traffic patterns and rules already. We will do the same at our new location.

2) There have been several comments by members of WCC of the potential dangers when rowing shells and canoers use the same body of water. Whatever location Georgetown rows from, whether Thompson's or our new proposed site, nothing will change with the normal traffic patterns on the rest of the river. The only difference with our proposed new boathouse will be at the point that our crews launch and land from. That issue is covered in point number 1, above.

Currently there are several points where the rowing and canoe practice lanes run together or are close to one another. As has been stated in the testimony of the WCC they are all well above the Three Sister's Islands, a mile or more above the proposed new boathouse site. Where the boathouse is located will have no impact on increasing, or reducing, those potential conflicts.

3) In our initial submission we provided an aerial photograph, to scale, of the river with a 1000-meter long, 50-meter wide canoe course on it. In the written submission after the June 19 hearing WCC stated that the course as we submitted was too close to the Three Sisters Island. The distance between the DC shore and the Three Sisters is very tight. It is probably true that there is not quite enough room for a 50-meter wide course at that point. Whatever the width of the course at that point, there is ample room at the finish line, at WCC, to fit a rectangular race course in between the Georgetown dock and the upstream rowing lanes.

A race course, properly surveyed, must have start and finish lines that are parallel and the racing lanes must be perpendicular to the finish line. There should be no advantage for the participant to leave his rowing or canoeing lane, to take a shorter course to the finish line.

WCC has shown a 250 meter and a 500 meter course with the race lanes much closer to the DC shore than the 1000 meter course. Since they indicate that the finish line is the same for both courses and the race lanes are not parallel to the 1000 meter course, it is clear that the racing lanes are not perpendicular to the finish line.

There are over 90 meters between the Georgetown dock and the upstream rowing lanes, more than enough room to fit in an 81 meter wide race course for WCC. Further, the Chair asked at the second hearing if uses and patterns of traffic on the river change when there are races. That is the case in the rowing community. The course used for races cannot be used or practiced on during races because the lanes cut across the normal traffic patterns. It can only be used when the normal traffic patterns are changed. For regattas we do this, by advising other rowing users and placing marshals on the river for safety purposes. I would expect that on any occasion when WCC conducts races on their course that they would advise us and we would not interfere.

4) The normal practices of the paddlers from WCC need not be impacted by our presence, either by our dock or the shells going out or coming in. Again, it only requires an awareness of where other users are when you are on the water, and not to get in their

way. The river is so wide in this area that there is ample room for all of us to use it without conflict.

XII. MISCELLANEOUS

Washington Monument. Contrary to testimony by some opponents, the Washington Monument is not visible from this section of the C & O Canal Towpath.

Zoning Placards. The zoning posters providing notice of the public hearing were located correctly. The Zoning Regulations provide in §3015.5 that the notice "shall be posted in plain view of the public at each street frontage on the property . . ." Placards were accordingly posted at the end of K Street, N.W. near the Property and on Canal Road, N.W.

Stability of C & O Canal. Some testimony questioned whether the small relocation of the Capital Crescent Trail might impact the berm of the C & O Canal. The preliminary design now being reviewed (or to be reviewed further) by the responsible agencies – the National Park Service, the Commission of Fine Arts and the Historic Preservation Office -- does not require a retaining wall or otherwise impact the C & O Canal. All parties will work cooperatively to achieve an optimal solution for the Trail and the C & O Canal. WCC's expressed concerns about the location of the access road adjacent to its site will also be resolved by all parties as plans move from preliminary to final approval.

Arlington County Boathouse. In its July 11, 2003 submission, WCC states that a new Arlington County Boathouse and a new bridge over the George Washington Memorial Parkway will be constructed in Roslyn, Virginia. The NPS is currently studying four sites in Virginia, including the site described by WCC, but no decision has been reached on which site is appropriate for the Arlington County Boathouse.

CONCLUSION

The Applicants believe that the responses in this statement, plus the evidence of record in this case, resolve all of the issues raised in opposition. We respectfully request approval of the application.

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

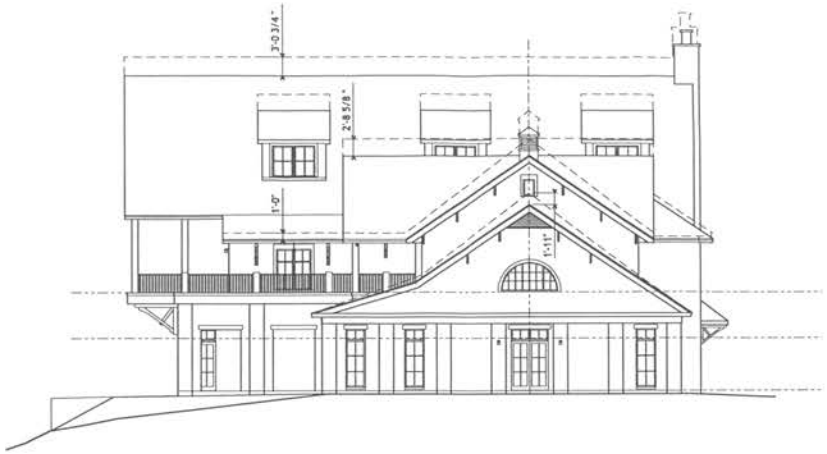
This site was significantly impacted by the construction of the 96-inch interceptor sewer and the temporary access road for the abandoned Three Sisters Bridge project in the 1960's and still retains those scars.

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.



1 EAST ELEVATION - REVISED

SCALE: 1" = 20'-0"



2 NORTH ELEVATION - REVISED

SCALE: 1" = 20'-0"

MUSE ARCHITECTS
5630 Connecticut Avenue NW Washington, DC 20015
Phone 202.966.6266 Facsimile 202.966.9666

GEORGETOWN UNIVERSITY

NEW NON-MOTORIZED BOATHOUSE
WATER ST, NW WASHINGTON, DC

ELEVATIONS REVISED

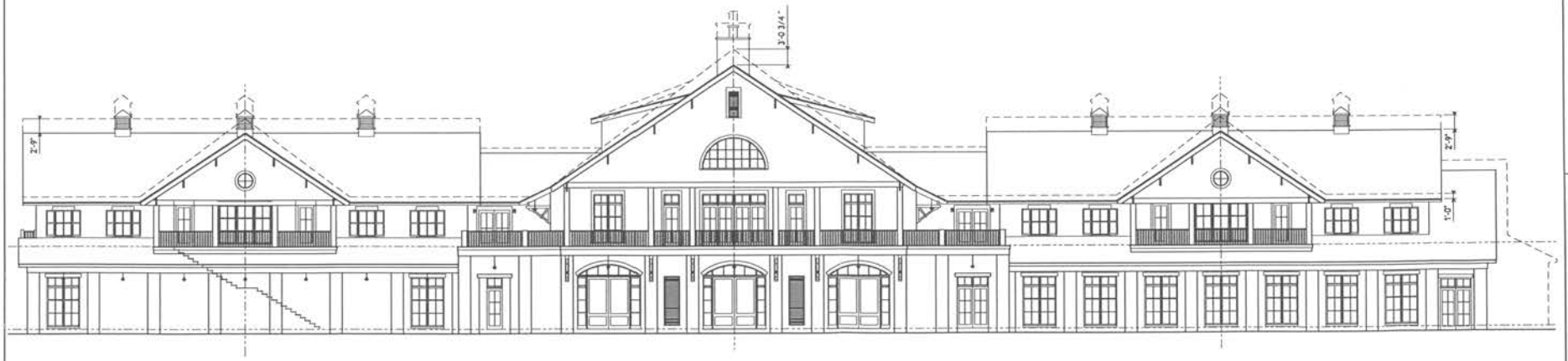
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JULY 18, 2003



1 WEST ELEVATION - REVISED

SCALE: 1" = 20'-0"



2 SOUTH ELEVATION - REVISED

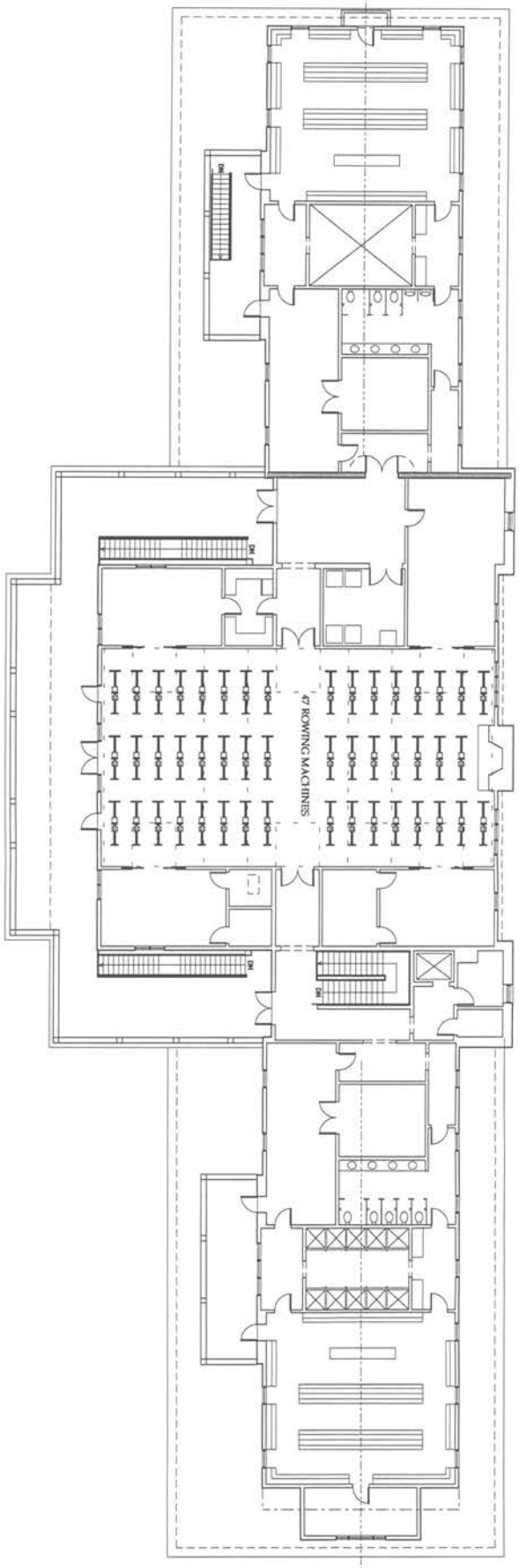
SCALE: 1" = 20'-0"

MUSE ARCHITECTS
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GEORGETOWN UNIVERSITY
NEW NON-MOTORIZED BOATHOUSE
WATER ST, NW WASHINGTON, DC

ELEVATIONS REVISED
SCALE: 1" = 20'-0"

JULY 18, 2003



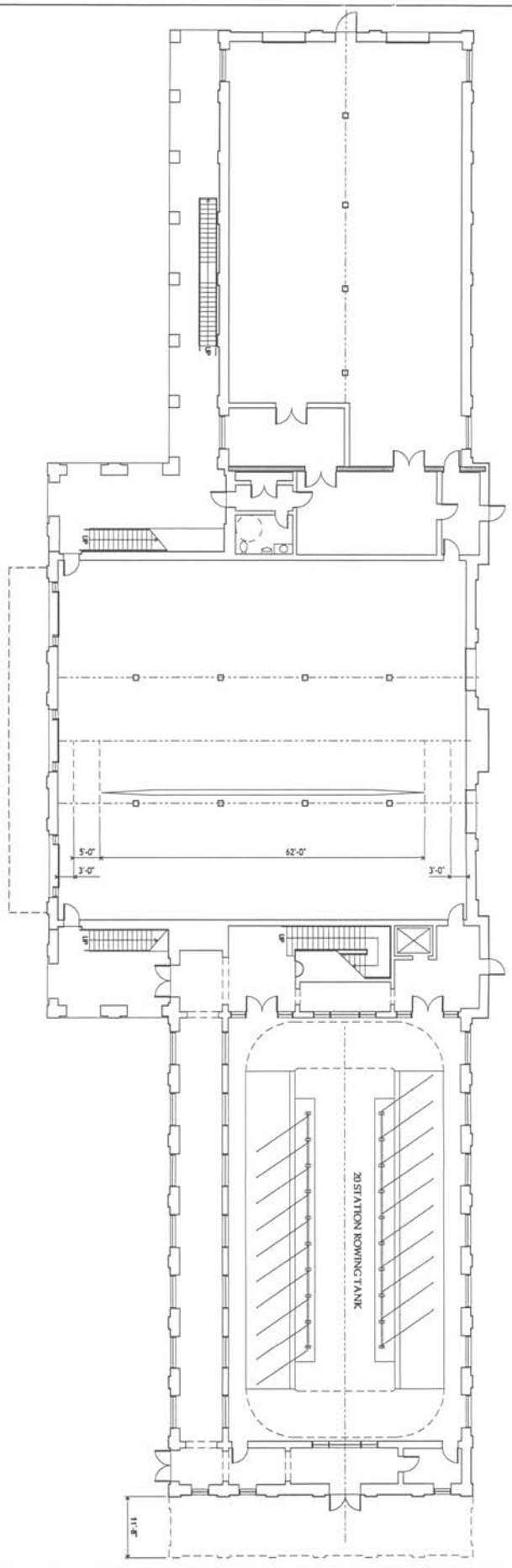
SECOND FLOOR PLAN REVISED

SCALE: 1" = 20'-0"

	JULY 18, 2003	SECOND FLOOR PLAN - REVISED SCALE: 1" = 20'-0"	GEORGETOWN UNIVERSITY NEW NON-MOTORIZED BOATHOUSE WATER ST, NW WASHINGTON, DC	MUSE ARCHITECTS 5630 Connecticut Avenue NW Washington, DC 20015 Phone 202.966.6266 Facsimile 202.966.9666

FIRST FLOOR PLAN - REVISED

SCALE: 1" = 20'-0"



	JULY 18, 2003	FIRST FLOOR PLAN - REVISED	GEORGETOWN UNIVERSITY NEW NON-MOTORIZED BOATHOUSE WATER ST, NW WASHINGTON, DC	MUSE ARCHITECTS 5630 Connecticut Avenue NW Washington, DC 20015 Phone 202.966.6266 Facsimile 202.966.9666

Applicant's Proposed Order

ZONING COMMISSION ORDER NO. 02-30
Case No. 02-30
(Georgetown University Boathouse – Map Amendment, Special Exception)
July 31, 2003

Pursuant to notice, the Zoning Commission for the District of Columbia held a public hearing on May 19, June 5 and June 19, 2003, to consider an application from the President and Directors of Georgetown College ("Georgetown University," the "University") and the National Park Service ("NPS") for a map amendment and a special exception. The Applicants originally applied for rezoning from unzoned to the W-1 District; the Zoning Commission at its own initiative determined to advertise the pending W-0 District as an alternative zone classification. Accordingly, the Applicant also applied for a special exception and a variance under the W-0 District to allow boathouse use on the subject property. The proposed project is a boathouse for use by Georgetown University's crew team. The public hearing was conducted in accordance with the provisions of 11 DCMR 3022. For the reasons stated below the Zoning Commission hereby approves the Application.

FINDINGS OF FACT

The Application, Parties and Hearing

1. On August 6, 2002 the Applicant submitted an application to the Zoning Commission for a map amendment from unzoned to the W-1 District for property identified as Tract 102-114 (the "Property") in order to allow construction of the University's proposed boathouse on the Property. W-1 is the lowest density existing zone classification that allows boathouse use. On October 28, 2002 the Zoning Commission decided to schedule a public hearing on the application.

2. On August 6, 2002 the Applicant also submitted a petition requesting several text amendments to the Waterfront District that would facilitate development of the boathouse. On October 28, 2002 the Zoning Commission decided to schedule a public hearing on that petition, which is Zoning Commission Case No. 02-31. See the separate Zoning Commission order on Case 02-31.

3. At its October 28, 2002 meeting, the Zoning Commission also considered a recommendation from the Office of Planning ("OP") that the proposed Waterfront Open Space zone (W-0) be considered in the alternative with the W-1 request. The W-0 zone requires a special exception for approval of boathouse use and development.

4. The parties in this case include the Applicant, Advisory Neighborhood Commission ("ANC") 2E, the Washington Canoe Club, the Coalition for the Capital Crescent Trail and the C & O Canal Association.

5. A description of the proposed development and the Notice of Public Hearing were published in the *D.C. Register* on [ ], 2003. The Notice of Public Hearing was mailed to all property owners within 200 feet of the subject property, as well as to Advisory Neighborhood Commission ("ANC") 2E. Zoning placards were properly posted in a timely fashion.

6. At its public meeting of July 31, 2003 the Zoning Commission took proposed action to approve the application by a vote of [ ]. The Zoning Commission took final action to approve the application on [.....], 2003 by a vote of [.....].

The Site and the Surrounding Area

7. The property fronts on the Potomac River and is part of federal parkland and open space along the river controlled by the Park Service. Immediately to the north of the parcel is the Capital Crescent Trail, and beyond that, the C & O Canal, flanked by the Potomac Heritage Trail. The C & O Canal and associated lands are also federal parkland and a national historic landmark maintained by the Park Service. Continuing to the north, the land rises up to Canal Road, a major arterial street, followed by Georgetown University located up a steep rise from Canal Road. Thus, the boathouse site is within convenient walking distance of the University.

8. The public park/open space land use pattern described above continues to the west and the east along the Potomac River for some distance. Immediately to the east of the property, as mentioned previously, is the boathouse of the Washington Canoe Club, an attractive wood-frame structure. Several hundred feet farther to the east is the dead end of K Street, the nearest point of vehicular access. Some surface parking exists at this location. Still farther to the east, K Street passes under Key Bridge and continues through the remainder of the Georgetown waterfront area.

9. The nearest developed areas to the Property are the Washington Canoe Club ("WCC") boathouse immediately to the east, the Georgetown waterfront (commercial and residential uses) father to the east, the Georgetown residential neighborhood to the northeast and the Georgetown University campus due north beyond Canal Road.

10. The Property fronts on the Potomac River, is owned by the U.S. Government and is unzoned. It is currently in use as public open space between the Potomac River and the Capital Crescent (biking/hiking) Trail. The parcel has a land area of approximately 1.09 acres and is long and narrow, being approximately 440 feet in length and of variable width in the range of 94 to 127 feet. The site is vacant and covered with grass and a number of trees. It is located approximately one-fourth of a mile west of Key Bridge and immediately to the west of the existing boathouse of the WCC, a party in this case. The WCC's boathouse is situated on public park land and is licensed from the National Park Service.

11. Immediately to the north of the parcel is the Capital Crescent Trail, and beyond that, the C & O Canal, flanked by the Potomac Heritage Trail. The C & O Canal and associated lands are also federal parkland and a national historic landmark maintained

by the Park Service. Continuing to the north, the land rises up to Canal Road, a major arterial street, followed by Georgetown University located up a steep rise from Canal Road. Thus, the boathouse site is within convenient walking distance of the University. Public parkland and the C & O Canal and towpath extend generally along the riverfront to the west of the Property. To the east of the Property is the Georgetown waterfront area, improved with residential and commercial buildings, some of them new construction and some of them restorations of historic buildings, together with open space.

12. The National Park Service has entered into an Exchange Agreement with the University to exchange Tract 102-114 for another waterfront property currently owned by Georgetown farther to the west – Tract 102-109. The property exchange will occur if and when certain conditions, including the establishment of zoning on the property, are met. The Exchange Agreement restricts the University's use to that of a non-motorized boathouse, which the University wishes to establish for the use of its crew program.

The Project

13. After conceptual design and feasibility studies by Robert A.M. Stern Architects confirming the feasibility of the use, the University selected Muse Architects in Washington, D.C., to design the new boathouse. Muse Architects undertook extensive field studies of the boathouses referenced above and others.

14. Functional areas in the boathouse will include: racing shell storage, repair bay, rowing tank, showers/locker rooms/restrooms, ante room with kitchen, multi-purpose area for exercise and training, observation deck, coach's office, and a dock and ramp for water access. Because the site is nine feet below the 100-year flood plain elevation, the design will allow floodwaters to enter the first floor but not reach the upper floors. After floods, the mud will be cleaned from the ground floor to make the structure ready for use again. Because of its location on a flood plain, the D.C. Environmental Health Administration and Watershed Protection Division will review the project.

15. A boathouse is allowed as a matter of right in the W-1 District and as a special exception pursuant to § 917.1(v) of the W-0 District. The zoning computations for the boathouse are summarized below in comparison with W-0 requirements in the right-hand column:

Land Area: 1.09 acres, or 47,480 s.f.	No minimum or maximum
Gross floor area: 32,325 s.f./0.68 FAR[1]	0.75 (§ 931.1(a))
Lot Occupancy: 41%	50% (§ 932.2(a))
Height: 40 feet	40 feet (§ 930.1)
Side Yards: 50' (east), 58' (west)	12 feet (§ 934.1)

[1] Zoning FAR may be slightly large due to inclusion of outdoor spaces such as decks.

Waterfront Setback: 8-15 feet	20 feet (§ 935.1)
Parking: None	17 spaces

16. The Applicants requested elimination of required parking as a special exception under 11 DCMR § 918.2, addressing the criteria in § 918.2 generally as follows:

- There is no street access to the Property; therefore motor vehicle parking is impossible.
- The Exchange Agreement between NPS and the University prohibits parking on the site.
- The proposed boathouse will be located close to the University campus, so that participants will either walk or bicycle to the site, as they do now when using Thompson's Boat House.
- The Parking Management Plan addresses parking related to regattas.
- Approval of the parking waiver will not adversely affect the public or neighboring property because of the convenient alternative means of access by participants in an environmentally friendly manner. This result is also consistent with the zone plan, in that the W-O zone is designed to allow recreational uses in an open space setting, again, in an environmentally sound way.

14. The Application requested a variance from § 935.1 of the W-0 District, which requires a setback of 20 feet from the normal high water mark. The proposed Georgetown University boathouse is setback only 15 feet from the mean high water line, and the porch overhand is set back only eight feet. The unique conditions and practical difficulty upon the property under this requirement are as follows.

(a) The narrowness of this waterfront site situated between the shore of the Potomac River and the Capital Crescent Trail make a greater setback such as 20 feet a hardship.

(b) If the waterfront setback is larger, the setback from the Capital Crescent Trail will become smaller. The building is properly sited with adequate and functional setbacks from the waterfront and the Capital Crescent Trail.

(c) An underground sewer main eight feet in diameter runs lengthwise through the site, thereby reducing flexibility regarding the siting of the boathouse.

(d) It is only the central core building that requires a variance. Two-thirds of the linear building frontage consists of the two side wings, which are set back 52 feet from the waterfront. The justification for a 20-foot setback in the record of the W-0 text amendment case is primarily to allow public

access along the waterfront.. The Georgetown boathouse will not be fenced and will allow full public access in keeping with the intent of the W-0 zone.

15. The Commission finds that the strict interpretation of the Zoning Regulations would result in "peculiar and exceptional practical difficulties," and that the variance can be granted without substantial detriment to the public good and will not impair the zone plan.

16. Paragraph 917.1(v) sets forth the special exception criteria for approval of a boathouse.

    (a) Criterion (2) states, "The facility shall not result in fill of normally submerged areas, and shall minimize excavation to that reasonably required for a principally above-grade facility." The Applicant stated and the Commission finds that there will be no fill of normally submerged areas. Excavation is minimized because the boathouse will rest upon caissons, or pilings. Drilling will be required, but such excavation will be extremely minor.

    (b) The Application addresses the parking criterion (4) by means of its justification for the parking waiver.

    (c) Criterion (1) states, "The facility shall be designed to enhance the visual and recreational opportunities offered along the waterfront." Criterion 3 states, "The facility shall be as located so that it is not likely to become objectionable to surrounding and nearby property because of noise, traffic, or parking, and to not limit access along or to the waterfront, other than directly in front of the boathouse structure." These criteria are addressed in Findings of Fact numbered 15 and 16, below.

17. A Parking Management Plan is required under § 905.4*(e)(3)* for infrequent special events such as regattas. The University's plan is summarized as follows. All students and Georgetown's crew team will either walk or bicycle to the site. Visitors and visiting crew teams will be shuttled to the end of K Street, a short walking distance to the boathouse along the Capital Crescent Trail. For this purpose the University has vans, midsize buses and full-size buses. The shuttles will run as continuously as required by the demand, perhaps leaving the campus every fifteen minutes, dropping patrons off and picking up others to return to campus. The team buses of visiting crews will park on campus for the duration of the regatta after dropping off team members. Patrons will be encouraged to park on campus and utilize the shuttle or walk to the boathouse from the campus via the C & O Canal tunnel or the stairwell located across from the Car Barn. It should be emphasized that the Georgetown Boathouse will never be the finishing point of a regatta. This fact will alleviate congestion significantly after the start of the event.

18. Pursuant to the filing requirements under 905.4(b), the amount of fill will be as follows. To establish a level grade for the building, the site will require approximately 25,000 cubic feet of fill.

19. Pursuant to the filing requirements under 905.4(c) regarding minimizing the environmental impacts on the river and riverbank areas, the Applicant states as follows:

    (a) The project, via review of the Exchange Agreement specifying boathouse use, has undergone extensive review by the District of Columbia Environmental Regulatory Agency. The requirements by that office include soil erosion control measures during construction, a storm water management structure including a sand filter to slow and control impervious area runoff.

    (b) The project will undergo the Environmental Review process of the D.C. Department of Health during the building permit process.

    (c) The project has also been reviewed by the Army Corps of Engineers, which determined that there are no qualifying wetlands on the site or habitats that will be disturbed by the introduction of the building on this site. The Army Corps has also reviewed and provided design guidelines for the proposed stone rip rap shore stabilization along the river, as well as the dock design.

    (d) A finding of No Significant Impact was determined for the environmental assessment of the proposed development that was executed as part of the exchange agreement between Georgetown University and the National Park Service.

Public Benefits of the Boathouse and Rezoning

20. The proposed boathouse use and zoning map amendment will accomplish numerous and significant public benefits as set forth below:

    (a) The boathouse will be a low-impact recreational use on the waterfront and will create no adverse effects on nearby property. The proposed boathouse will help animate this part of the waterfront while generating minimal motor vehicle traffic and providing no paved surface for parking that would exacerbate storm water runoff. The boathouse will be an environmentally "friendly" use on the waterfront and will not adversely affect the use and enjoyment of neighboring properties.

    (b) Construction of the boathouse will help accomplish planning goals for the Georgetown waterfront, to increase opportunities for recreational and competitive rowing and paddling on the Potomac River. The Georgetown

Waterfront Park Plan was developed by the National Park Service ("NPS") in the 1980s as a result of an extensive public planning process. It was approved in 1986 by the National Capital Planning Commission ("NCPC"), Commission of Fine Arts ("CFA"), District of Columbia Historic Preservation Review Board ("HPBR"), Advisory Council on Historic Preservation and the C & O Canal National Historical Park Advisory Commission. Further, it was the basis of the resolution adopted by the Council of the District of Columbia to transfer jurisdiction of 10 acres of District property to the NPS for park purposes. The Georgetown Waterfront Park Plan includes a designated boathouse zone that includes the Georgetown University boathouse site. This zone was carefully studied prior to its establishment by NCPC, CFA, HPRB and the C & O Canal National Historical Park Advisory Commission The planning rationale is to cluster architecture of boathouses in the urban context of Key Bridge rather than locating them at many different sites along the river's edge. Thus, this zone allows for the collective quality of several boathouses that is greater than that of any individual boathouse. The Georgetown University boathouse will be the western end of the boathouse row as approved in the Georgetown Waterfront Park Plan.

(c) Based on a review of boathouse designs at other eastern universities, the boathouse design uses gabled roofs, materials of shingle and stone, and porches and decks to link this new boathouse to the boathouse traditions of the past and create a handsome complement to the adjacent Washington Canoe Club structure. The architectural design and materials are of high quality and will present a pleasing view for the public of a building and an activity that belong on the riverfront. The design was highly praised in approvals by the Old Georgetown Board, the Historic Preservation Review Board and the Commission of Fine Arts in 2001. The public will also enjoy seeing the rowing practices of the Georgetown crew team as well as regattas.

(d) The Georgetown boathouse will be appealing to look at from the Capital Crescent Trail as architecture, as a point of activity and interest, and as a use that clearly belongs on the waterfront.

(e) The proposed athletic and recreational activities are highly desirable on the Potomac River, especially given the fact that Washington's riverfronts have too few destinations and activities, especially recreation. This recreational project will bring life and added interest to the city's waterfront and help put our city on a par with other cities such as Boston and Philadelphia, where non-motorized boating activity adds to the vitality of the waterfront and the city as a whole. Because the boathouse property fronts on the Capital Crescent Trail, the proposed use will also add visual interest for hikers and bikers on this part of the trail.

(f) Approval of this application will enable Georgetown University to have its own high-quality boathouse and leave temporary and crowded space at Thompson's Boathouse. The shell storage space made available at Thompson's will help accommodate the rapidly expanding high school crew programs in the Washington area.

(g) The land exchange between the National Park Service and Georgetown University results in the public obtaining a valuable piece of natural open space in an important location – the Potomac Palisades -- and eliminates as well the undesirable potential for a mile-long vehicular roadway alongside the Capital Crescent Trail to this site. The proposed Georgetown boathouse site, by contrast, has no significant wetlands, vegetation or wildlife. The site is the product of landfill, having been radically disturbed in 1969 when the interceptor sewer line (seven feet in diameter) was placed below grade and in the 1970s, when an access road was constructed on the site in connection with the start of construction of the Three Sisters Bridge. The unimproved part of the Georgetown boathouse site will be maintained as naturally landscaped open space accessible to the public.

Consistency with the Comprehensive Plan

21. The boathouse and zoning change will help carry out the *Comprehensive Plan for the National Capital* (the "Plan") in numerous ways, as set forth below. The Home Rule Act provides that zoning shall be "not inconsistent" with the Comprehensive Plan.

(a) *Waterfront Planning, Recreation and Environment.* The Plan, at 10 DCMR 1115.1(c) under "Public and Institutional Land Use Objectives" calls for the District to engage in waterfront planning and to capitalize on "unrealized opportunities for creating exciting and imaginative water-focused recreation . . . and cultural development along the Anacostia and Potomac Rivers and [to ensure] that new development enhances the physical and environmental quality of the rivers and adjoining areas." The proposed W-1 or W-0 zoning and non-motorized boathouse use would advance this public objective.

(b) *Ward Two Element – Urban Design, Recreational Use.* The Ward Two Element of the Plan, under Urban Design objectives at 10 DCMR 1317.1(d) states that:

(1) The city, working with the National Park Service, shall ensure that Ward 2 waterfront areas, including Georgetown . . , provide public access and use.

(c) *Federal Element – Natural Features and Recreation on Waterfronts.* The Federal Elements of the Comprehensive Plan include the following policy statement under "Natural Features, Shorelines and Waterfronts:"

> All lands within 150 to 200 feet of the water's edge along the Potomac and *Anacostia Rivers should be managed in a manner that will encourage the enjoyment and recreational use of water resources, while protecting the scenic values of the waterways.*

The W-1 or W-0 zoning and the boathouse use with continued open space and public access to the shoreline will advance this public policy.

(d) *Generalized Land Use Map – Land Use Element.* The Generalized Land Use Map of the District's Land Use Element designates the subject site for use as "Parks, Recreation and Open Space." The proposed zoning and restricted recreational and open space use of the site are consistent with the "Parks, Recreation and Open Space" land use designation.

Report of the Office of Planning

22. By reports dated May 9 and June 27, 2003 and by testimony at the public hearing, the Office of Planning ("OP") recommended approval of the application. The June 27 report states in part, "The site is within the 1987 Georgetown Waterfront Plan boathouse zone, and the use of the site for a boathouse would not be inconsistent with either the W-0 zoning regulations or the Generalized Land Use Map." (p. 1) The May 9 report also recommended approval of W-0 zoning for the site and approval of the requested special exceptions (for the boathouse use and to eliminate required parking), and variance (for waterfront setback). In the June 27 report, OP requested additional justification for the front porch overhand and suggested examining whether the height of the peak of the central core building could be lowered to a degree. The Applicant provided such further justification and also submitted revised plans that would lower the height of the central core building by three feet.

Commission of Fine Arts Recommendation

23. The Commission of Fine Arts granted concept design approval to the project on October 18, 2001. The Old Georgetown Board and the Historic Preservation Review Board had previously granted preliminary approval.

Report of the D.C. Department of Transportation

24. The District Department of Transportation ("DDOT") recommended approval of the project in terms of vehicular access, parking and emergency access. The Zoning Commission requested that the DDOT further comment on potential conflicts between parking and buses for the drop-off of boathouse users on the end of K Street NW. The DDOT advised that the issue of bus and emergency

vehicle turn around at the end of the street was reviewed in relation to the Georgetown Waterfront Park plan, and it was determined that there is sufficient room available. Small buses and larger emergency vehicles would be able to safely and conveniently turn around at this location. The service road would permit the turn around of boat trailers and emergency vehicles on the G.U. boathouse site.

Reports of Other Agencies

25. Several other District of Columbia agencies submitted reports on the case. All of them were favorable with the partial exception of the Department of Health, which raised some environmental concerns. The Commission finds from evidence in the record that these environmental issues were addressed at the federal and local level to a degree during the approval of the Exchange Agreement in 1995-96 and that the D.C. environmental review process will further occur during the building permit process.

Report of Advisory Neighborhood Commission 2E

26. By letter dated [ ], 2003 and by testimony at the public hearing, ANC 2E unanimously recommended approval of the application. The ANC representative stated that the ANC has reviewed the project and supported its approval several times over the past two years, including the approval actions of the Commission of Fine Arts and the Old Georgetown Board.

Testimony in Support

27. Twenty-seven persons and organizations testified in support of the application. These included the Woodrow Wilson High School Crew Boosters Club, three members of the Georgetown Waterfront Park Commission, the Potomac Boat Club, the Potomac River Sports Foundation, the Georgetown Rowing Association, the High School Boathouse Coalition on the Potomac River, St. Albans and the National Cathedral School, several rowers, a rowing coach and residents of Georgetown.

28. Testimony in support emphasized the following points:

a) The Georgetown Waterfront Park Commission stated that Georgetown University was a full participant in the Commission's work and kept the Commission informed of its plans, whereas the Washington Canoe Club became inactive. Further, the Georgetown boathouse should not be located east of 34th Street because there it would disrupt views and access to the river by those trying to use the proposed 10-acre park.

b) The Georgetown University boathouse will allow area high school programs to grow because space at Thompson's boathouse will be freed up. High schools currently using Thompson's Boathouse, have been forced to store their boats

outdoors in a fenced compound. In two years, when the Swedish Embassy, which owns the land, builds on the site, that outdoor storage space will disappear. Relocating Georgetown University and George Washington University crew teams to their own facilities would allow Thompson's to be used for area high school teams and alleviate their critical problem of inadequate boat storage.

c) The size of the proposed boathouse is reasonable, the use is non-polluting, it creates no regular vehicular traffic, and the dock does not get in the way of other river users. The boathouses along Boathouse Row in Philadelphia, which are very close together, manage to coexist quite well.

d) The design is excellent and appropriate and will be a beautiful addition to the waterfront. The envisioned boathouse zone will enhance the ambience of the Georgetown waterfront by reinforcing the century-old tradition of rowing and canoeing in this historic location.

e) The proposed site is a very good one, with long straight stretches, and that good, water accessible sites are limited. There have been environmental objections to the proposed boathouse, but it is impossible to build along the river without some environmental disturbances, which will be minimal at the subject site.

f) There has been no new boathouse space built since Thompson's Boat Center was built in 1960, and the demand for space is increasing rapidly.

g) Different river users can be good neighbors. People at the Potomac Boat Club and the Washington Canoe Club all understand the traffic patterns on that part of the river, and cooperate in their enjoyment of it. He stated that Georgetown University, in its current location at Thompson's, has dealt with other rowers and paddlers, and will be a good and welcome neighbor at the proposed site. The river is not owned by the Washington Canoe Club for its exclusive use, but that the river is for everyone's enjoyment. He stated that everyone must learn to share the river.

h) The community of Georgetown is solidly behind the University's boathouse and that the Washington Canoe Club's opposition is self-motivated. The University's planning for a boathouse has been subject to a great deal of public scrutiny and discussion. When the Georgetown Waterfront Commission Boathouse Committee started five years ago, the Washington Canoe Club was involved, but their involvement quickly fell away. It is unfortunate that the Washington Canoe Club's objections are coming so late in the process.

i) The Georgetown Waterfront Park plan should be carried out, and the construction and operation of the Georgetown University boathouse is the single most important step that can be taken to continue progress.

Testimony in Opposition

29. The three parties and several individuals testified in opposition. Testimony in opposition emphasized the following points:

a) The proposed boathouse is too high and too wide. Accordingly, it will unduly block views of the river and of Key Bridge from the Capital Crescent Trail and the C & O Canal Towpath. The peaks of the roofs of the central core building and the side wing extend above the elevation of the towpath. The building should be set back farther from the river.

b) The use of parkland for a private boathouse should not be allowed, as it will result in a loss of parkland. The Georgetown University boathouse should be located on a site east of 34th Street. The public will lose access to the water's edge at this site.

c) The Washington Canoe Club's world class kayakers and other paddlers will be handicapped by conflicts between the WCC's established practice and racing courses and the Georgetown crew team's courses. This is especially caused by the University's boat dock extending too far into the river. Smaller paddling craft have difficulty being near the larger and somewhat dangerous racing shells.

d) The use of the Capital Crescent Trail will be impeded by congestion associated with the Georgetown University boathouse.

e) The site has valuable environmental qualities that should be retained in a natural condition. This is a shallow part of the river, and sediment accumulation due to use of motor launches will require dredging. There will be increased pollution and run-off if the boathouse is built, as well as loss of wildlife and valuable plants. Use of chlorine in the rowing tank poses an environmental hazard.

f) The rowing tank and exercise machines should be removed from the boathouse and located on the University's campus so that the boathouse can be smaller.

g) The proposed boathouse is an intrusion into the C & O Canal National Historic Park.

CONTESTED ISSUES

Location of the Proposed Boathouse

30. Opponents objected to the location of a collegiate-size boathouse on the subject site and recommended that the Georgetown University boathouse be located on a site to be determined, east of 34th Street.

31. The Commission finds that an extensive public planning process has resulted in the subject site being officially designated for boathouse use. This site is the appropriate location for the boathouse because it is consistent with the approved plan for the Georgetown Waterfront Park for the water-dependent use of boathouses. The Georgetown Waterfront Park Plan was developed by the National Park Service in the 1980s as a result of an extensive public planning process. It was approved in 1986 NCPC, Commission of Fine Arts, District of Columbia Historic Preservation Review Board, Advisory Council on Historic Preservation and the C & O Canal National Historical Park Advisory Commission. The Georgetown Waterfront Park Plan includes a designated boathouse zone that includes the Georgetown University boathouse site. This zone was carefully studied prior to its establishment by these agencies. The planning rationale is to cluster architecture of boathouses in the urban context of Key Bridge rather than locating them at many different sites along the river's edge. Thus, this zone, which stretches from 34th Street to the Georgetown site, allows for the collective quality of several boathouses that is greater than that of any individual boathouse.

The Land Exchange

32. Opponents argued that the use of Tract 102-114 for a boathouse represented a net loss of public parkland and that this tract should remain parkland in part because of its environmental qualities.

The land exchange between the University's existing one-acre parcel on the Potomac Palisades waterfront and the National Park Service site (Tract 102-114) in the designated boathouse zone is environmentally beneficial given the higher environmental quality of the Palisades parcel. Because the sites are approximately equal in land area, there will be no net loss of parkland.

There are no significant wetlands, vegetation or wildlife on the boathouse site, which was altered substantially in the 1960s and 1970s by installation of the Dulles interceptor sewer and construction of a temporary road. In contrast, the Palisades site is rated as high-quality wetlands with significant and valuable plant and wild life. The Palisades property contains a combination of mature and second growth riverine vegetative habitat and contains a high-grade wetland, with numerous species of birds and small mammals. The Potomac Palisades area is currently being inventoried for vegetation species.

Official environmental reviews of the land exchange by federal and local agencies found that the exchange was environmentally preferable. The Commission concurs with this assessment.

Effect on Use of Capital Crescent Trail

33. The Coalition for the Capital Crescent Trail and other opponents state that the Georgetown University Boathouse will somehow block or impinge upon the use

of the trail. The Applicant argued that there is no reason for any impediment to occur. The asphalt bike trail is 10 feet wide. It will continue to be 10 feet wide after being partially relocated to the north by a few feet. The Georgetown University boathouse has its own 12-foot-wide access road, separated by a three-foot planting strip from the bike trail, and the boathouse is further set back 5 to 8 feet from the access road. There is no reason to believe users of the Georgetown University boathouse will get in the way of users of the trail, any more than other uses along the trail create such problems. The Applicants state that they are committed to working with the key organizations involved in the Trail and the trail designers to ensure a functional and attractive trail design as part of the minor relocation of the trail. The parameters of the shared use of the former CSX right-of-way have been stipulated by the National Park Service, the steward and manager of the Capital Crescent Trail, in consideration of the right of access over the Trail owned by Georgetown University.

Scale of the Boathouse Structure

34. Opponents argued that the scale of the proposed boathouse structure will block views of the Potomac River from the Capital Crescent Trail, the C & O Canal Towpath and upriver from the Washington Canoe Club.

The Applicant's architects justified the scale of the structure in several categories. Regarding Exterior Design Concepts, the architects state that, rather than locating required functions in one large box, the new building is divided into five parts (main center body, two side wings and two connecting hyphens). This division, which was applauded by the ANC, OGB, and CFA, allows for a reduction in the scale of the overall structure, creation of large (42-55-foot-deep) green spaces between the side wings and the river and creation of a varied and interesting roofline. Gabled roofs incorporate traditional boathouse detailing, hide all mechanical equipment, and allow an interesting roofline when viewed from the C & O Canal above.

Under program requirements, the Applicant states that the facility provides only the minimum number of shell storage spaces necessary to accommodate Georgetown University's crew program, and that several significant and desirable functions were deleted from the design, including living quarters for full-time staff member, separate shop for repairing shells (combined with storage bay), private offices (presently one shared office), counseling rooms and separate great hall and exercise rooms (combined as one room). The architects submitted the dimensional requirements for each type of space.

As to the critical matter of adequate and properly sized shell storage bays, the architect stated that the minimum area has been designed. Any additional reduction in scale would result in unsightly exterior storage, and for security, an exterior fence, which would have the collateral effect of excluding the public from the waterfront. Title IX requirements also dictate equal sized men's and women's teams and locker rooms.

The combination of these three types of program spaces results in a new building of 33,000 gross square feet, and 22,737 net square feet, which is a typical size for a post-Title IX university boathouse.

As to the question of obstruction of river views from the Capital Crescent Trail and the C & O Canal Towpath, the Applicant states that: one can not see the river from these trails now because of the foliage, with some exception in the winter months; people using the trail and the towpath tend to be moving on bikes, running and walking, and that the proposed boathouse will only block the view to a very limited degree, namely, that of a roof peak. Any boathouse on the site will block some views at least temporarily. Because of the bluffs behind the site, there are no places where residents, businesses or persons gathered in a stationary way will experience blockage of views.

In response to concerns regarding scale, the Applicant submitted a revised design with the following changes. The height is reduced by three feet, the length of the building is reduced by 11' 8" by reducing the size of the rowing tank from 24 to 20 rowers, and the building's footprint is reduced by 675 square feet. The Applicant also provided a detailed rationale as to why the rowing tank and exercise machines need to be located in the boathouse.

Environmental Issues

35. Opponents raised a variety of environmental concerns regarding construction of a boathouse on the subject site.

A Federal Environmental Assessment under the National Environmental Protection Act ("NEPA") was completed in 1995 with regards to the proposed land exchange for the boathouse. That analysis resulted in a "finding of no significant impact", so that a more detailed Environmental Impact Statement ("EIS") was not required. The Army Corps of Engineers determined at that time that there are no qualifying wetlands on the site or habitats that will be disturbed by the introduction of the building on this site. The Army Corps has also reviewed and provided design guidelines for the proposed stone rip rap shore stabilization along the river, as well as the dock design. The National Park Service noted that additional federal environmental review under NEPA is not anticipated, but review of specific construction issues at the building permit stage by both Federal and District agencies will be required. The project will undergo the District of Columbia's Environmental Review process during the building permit process. Under the D.C. Environmental Protection Act of 1989, an Environmental Impact Screening Form ("EISF") is required for any proposal with a value of greater than $1 million, and appropriate reviews will follow.

The Commission finds that the environmental reviews required by laws and regulations are underway and will continue through the building permit process,

and that these processes are the appropriate ones for resolving environmental issues.

CONCLUSIONS OF LAW

1. Section 5-413 of the D.C. Code establishes the authority of the Zoning Commission to "promote the health, safety, morals, convenience, order, prosperity or general welfare of the District of Columbia."

2. Rezoning the Property to W-1 or W-0 with a special exception and variance will promote orderly development in conformity with the entirety of the District of Columbia zone plan as embodied in the Zoning Regulations and Map.

3. The W-1 zone is appropriate because the Waterfront ("W") zones are designed specifically for mapping along waterfronts and include an appropriate mixture of uses for that purpose. Water-oriented uses such as marina and boat club are allowed as a matter of right. The W-1 District allows the lowest height and bulk of buildings of the three existing W zone classifications. The proposed boathouse can be constructed within the maximum permitted height of 40 feet, the maximum nonresidential floor area ratio ("FAR") of 1.0 and other standards regulating lot occupancy and setbacks.

4. The Waterfront Open Space (W-0) zone with special exception and variance is also appropriate because this zone is designed to accommodate a limited range of recreational, cultural and retail uses within open spaces along the city's waterfronts. The Applicants submitted an application for a special exception and one variance under W-0 zoning on March 13, 2003.

5. Approval of the project will help achieve numerous public policy and public benefits relating especially to carrying out the Georgetown Waterfront Plan and the boathouse zone plan contained therein.

6. Approval of this Application is not inconsistent with the Comprehensive Plan for the National Capital.

6. The Commission has accorded to Advisory Neighborhood Commission 2E the "great weight" to which it is entitled.

DECISION

In consideration of the Findings of Fact and Conclusions of Law herein, the Zoning Commission orders **APPROVAL** of the Application for a map amendment for Tract 102-114 from unzoned to W-1 or W-0 with the related special exception and variance for boathouse use. This approval is subject to the following guidelines, conditions and standards:

1. The project shall be developed in accordance with the revised plans submitted as Exhibit [ ] in the record of this case.

2. The only permitted use of the land shall be for a non-motorized boat house as depicted in the plans and the record of this case.

3. The height of the boathouse shall not exceed forty feet (40').

4. The unimproved portions of the Property shall be maintained in a naturally landscaped condition, as depicted in the site plan.'

5. A vehicular turnaround area shall be provided as shown on the plans.

6. No parking will be provided on the site.

Vote of the Zoning Commission taken at its public hearing of this case on [ ], 200, by a vote of [ ].

In accordance with the provisions of 11 DCMR 3028, this order shall become final and effective upon publication in the D.C. Register, that is, on _____.

CAROL J. MITTEN
Chairman
Zoning Commission

JERRILY R. KRESS, FAIA
Director
Office of Zoning