COMMISSION ACTION

NCPC File No. ZC 02-30

NCPC
NATIONAL CAPITAL PLANNING COMMISSION

AMENDMENT TO ZONING MAP OF THE DISTRICT OF COLUMBIATO ZONE PROPERTY FROM UNZONED TO W-0 OPEN SPACE FOR THE GEORGETOWN UNIVERSITY BOATHOUSE

Submission by the Zoning Commission of the District of Columbia

November 6, 2003

Commission Action Requested by Applicant

Approval of comments to the District of Columbia Zoning Commission pursuant to Section 8 of the National Capital Planning Act (40 U.S.C. § 8724 (a)) and D.C. Code § 2-1006 (a)).

Commission Action

The Commission concludes that the proposed zoning map amendment to zone 1.09 acres of land to W-0 Waterfront Open Space would not negatively affect the federal interests, provided the construction of the Georgetown Boathouse complies with the Memorandum of Agreement resulting from the Section 106 process required for the exchange of lands between the National Park Service and Georgetown University as approved by the National Capital Planning Commission on September 7, 1995.

Deborah B. Young
Secretary to the National Capital Planning Commission

ZONING COMMISSION
District of Columbia
Case 02-30
Exhibit 387

ZONING COMMISSION
District of Columbia
CASE NO.02-30
EXHIBIT NO.387

ST. FF RECOMMENDATION

NCPC File No. ZC 02-30

NCPC
NATIONAL CAPITAL PLANNING COMMISSION

AMENDMENT TO ZONING MAP OF THE DISTRICT OF COLUMBIA TO ZONE PROPERTY FROM UNZONED TO W-0 OPEN SPACE FOR THE GEORGETOWN UNIVERSITY BOATHOUSE

Submission by the Zoning Commission of the District of Columbia

October 30, 2003

Abstract

The District of Columbia Zoning Commission has taken a proposed action to zone approximately 1.09 acres of land to the W-0 Waterfront Open Space Zone District. The parcel, identified as Tract 102-114, is located on the Potomac River approximately ¼ mile northwest of the Key Bridge, and just west of the Washington Canoe Club. The proposed zoning map amendment would permit the construction of the Georgetown Boathouse, a new rowing facility for the Georgetown University Rowing Team. The parcel of land was acquired by Georgetown University from the National Park Service in a land exchange that was approved by NCPC in September of 1995. The W-0 zoning district is a new zoning category which has been submitted to the Commission for review concurrently with this proposed action.

Federal Interests

The federal interests in this case include the Potomac River Waterfront, which is identified as an area of federal interest under the Federal Elements of the Comprehensive Plan for the National Capital; the C&O Canal National Historic Park, which lies directly east of the subject site; and the Memorandum of Agreement (MOA) resulting from the Section 106 process required for the exchange of lands between the National Park Service and Georgetown University as approved by the National Capital Planning Commission.

Commission Action Requested by Applicant

Approval of comments to the District of Columbia Zoning Commission pursuant to Section 8 of the National Capital Planning Act (40 U.S.C. § 8724 (a)) and D.C. Code § 2-1006 (a))

Executive Director's Recommendation

The Commission:

- Concludes that the proposed zoning map amendment to zone 1.09 acres of land to W-0 Waterfront Open Space **would not negatively affect the federal interests.**

In a related recommendation, the Commission advises the **National Park Service** that:

- The construction of the Georgetown Boathouse **must comply** with the **Memorandum of Agreement** resulting from the Section 106 process required for the exchange of lands between the National Park Service and Georgetown University as approved by the National Capital Planning Commission on September 7, 1995.

* * *

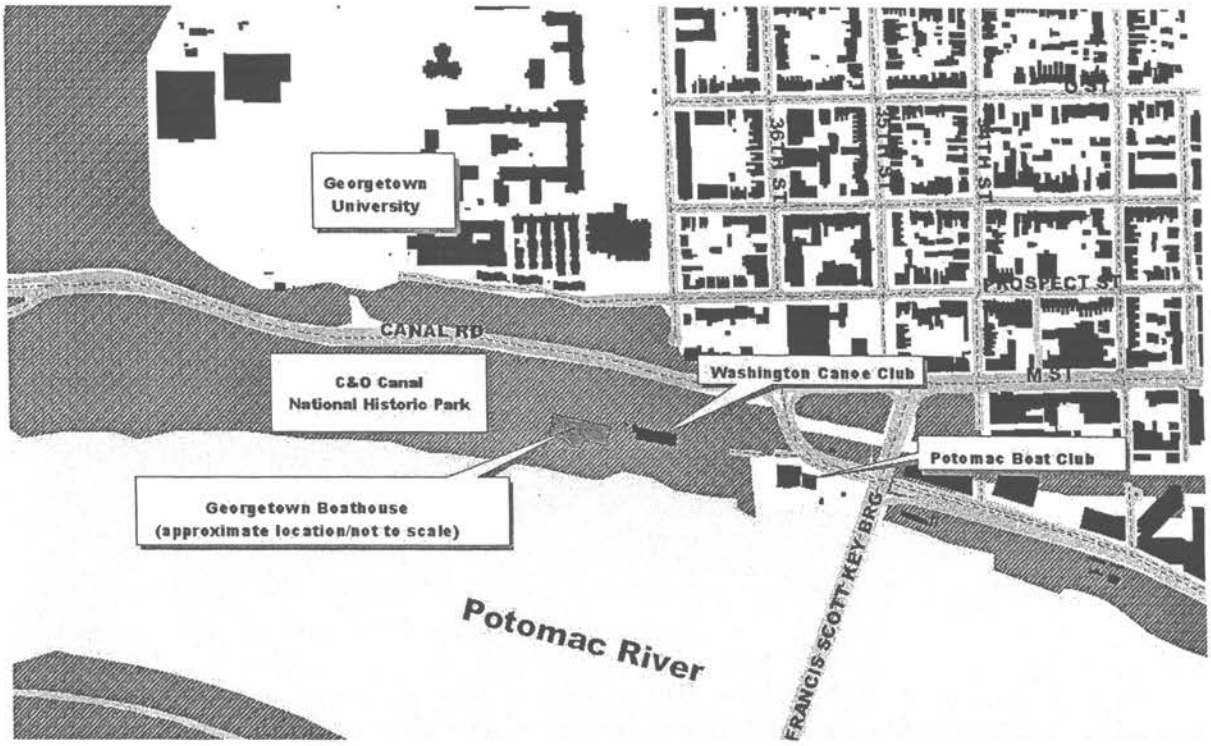
BACKGROUND AND STAFF EVALUATION

DESCRIPTION OF PROPOSAL

The District of Columbia Zoning Commission has taken a proposed action to zone approximately 1.09 acres of land, located directly northwest of the Key Bridge, to the W-0 Waterfront Open Space zone district. This parcel was formerly under the ownership of the National Park Service (NPS) but was exchanged with Georgetown University for land northwest of the subject site. The exchange was approved by the National Capital Planning Commission in September of 1995, and is explained in greater detail later in this report.

Two alternative applications regarding this project were made to the Zoning Commission, with the National Park Service and Georgetown University being co-applicants of each. The first application requested to have the subject site rezoned to W-1 (Waterfront Zone – Moderate Density) and the second application was a text amendment to provide a definition of non-motorized boathouse uses in the zoning regulations. The Office of Planning recommended that the subject site be rezoned to the new W-0 zoning which would account for the non-motorized boathouse use, thereby eliminating the need for the text amendment. The Zoning Commission concurred with this recommendation and the text amendment case was subsequently withdrawn and the rezoning application was amended to W-0.

The subject site is identified as Tract 102-114, and is located a quarter mile northwest of the Key Bridge in Northwest Washington, DC. The site is adjacent to the C&O Canal National Historic Park on the west, and the Washington Canoe Club to the east. The C&O Canal National Historic Park is a historic park facility under the jurisdiction of the National Park Service, and the Washington Canoe Club is a private canoeing club that has been in existence since roughly 1904. The site is outside of the boundaries of the National Park Service's Georgetown Waterfront Plan, which was approved by the Commission in September of 2003. The following map depicts the location of the subject site.



Zoning Action

The proposed Zoning Commission action before the Commission at this time is the application of the W-0 zoning district to the subject site. It is a matter of public record that this zoning action will permit the new Georgetown Boathouse, however the current submission is not of a project specific nature and relates only to the zoning of these 1.09 acres to W-0. The W-0 zone has only recently been adopted and it is the subject of case number ZC 02-42, which is pending before the Commission concurrently with this submittal.

The W-0 Waterfront Open Space Zone District is a low density, restricted use zoning district which has been developed to encourage open space and recreational uses along Washington's waterfronts. This is the first application of the new zoning district to the District of Columbia Zoning Map.

The W-0 zone district restricts industrial, manufacturing and high density commercial and residential uses. Permitted uses are kept to a minimal height and Floor-to-Area Ratio (FAR), so as to not allow development to overwhelm the waterfront area. The following table summarizes the general building restrictions of the W-0 zoning district.

Maximum FAR	0.5 / 0.75 for marina, yacht club or boathouse
Maximum Height	40 feet
Lot Occupancy	25% / 50% for recreational, marina, yacht club or boathouse
Side Yards	12 feet
Front Yard	None Required
Rear Yards	None required

The W-0 zone also requires a deep waterfront setback for structures adjacent to the river's edge. Under the regulations, a building must have greater than 100 feet of setback to be built matter of right. Less than 100 feet but greater than 20 feet is permitted as a special exception requiring approval either by the District of Columbia Zoning Commission or the Board of Zoning Adjustment (BZA). If a structure is to have less than 20 feet of setback, then it must be approved by either the Zoning Commission or BZA as a variance, which would require justification that a unique situation and hardship arising from the land exists necessitating the reduced setback.

In terms of permitted uses, the W-0 restricts all industrial and manufacturing developments and any high density residential or commercial uses. However, the district does permit recreational uses as a matter of right, and allows for boathouses, marinas, yacht clubs, and low density retail and cultural uses as a special exception. Under the special exception process, the project must prove that it is complementary to the intent of the W-0 zone and that it is adequately designed and located so as to not hinder the coherent development of the waterfront.

Georgetown Boathouse

The current submission before the Commission is the Zoning Commission action which will zone tract 102-114 to the W-0 zone district. However, the current zoning action is to allow for the construction of the Georgetown Boathouse, which will be a non-motorized boat facility to be used by the Georgetown University Rowing Team. This project was of considerable concern to the Zoning Commission, as it will require a special exception and variance approval from that board, and was the subject of the land exchange approved by the National Capital Planning Commission on September 7, 1995. Although the boathouse will not be submitted to NCPC for specific project review, it is important that the Commission understand the Boathouse's conceptual design at this point given its weight in the Zoning Commission action and the NCPC action in 1995.

According to the information staff has received and in the public record, the Georgetown Boathouse will be a 33,199 gross square feet floor area structure with an FAR of .69. The structure will have a lot occupancy of 41 percent and a height of 40 feet from grade to ceiling of the uppermost story of the structure. The site is constrained by the Capital Crescent Bike Path which is located at the northern edge of the site, and the building will be situated between the path and the river's edge. The design of the building, as stated by the applicant, is to be consistent with the Washington Canoe Club to the east and consists of a main structure flanked on its east and west by two wings, with a porch extending towards the riverfront and boathouse's docks. The waterfront setback of the building, measured from the building's nearest point will be 15 feet. This is contrary to the W-0 zone requiring 20 feet and will require a variance approval from the Zoning Commission. The boathouse will not have direct vehicular access and the users, Georgetown students, will be required to bike or walk to the site using the Capital Crescent Trail. A small service drive for boat loading and un-loading to be located on the northern side of the bike trail has been discussed but this drive has not been represented on any site plan received by NCPC staff. The site plan and renderings as submitted to the Zoning Commission are attachments to this report.

District of Columbia Office of Planning

The District of Columbia Office of Planning (DCOP) issued reports on both applications filed for the Georgetown Boathouse project. DCOP did not support the text amendment originally filed by NPS and Georgetown University as the amendment would unnecessarily be applied not just to the Georgetown Boathouse, but also the entire waterfront throughout the District. Further, DCOP did not support the rezoning of the site to W-1 as it would permit a higher level of use than anticipated for waterfront areas such as this parcel. DCOP recommended that the proposed site be zoned to the new W-0 zoning, which would account for boathouse uses and properly regulate density and setback. The application was amended to the W-0 zoning, and subsequently the Office of Planning recommended approval of that action.

Previous Commission Action

On September 7 1995, NCPC reviewed and approved the exchange of lands between the National Park Service and Georgetown University. The exchange sites include the subject site, which is Tract 102-114, and a site which was held at that time by the University and is a 1.1 acre site identified as Tract 102-109. This site is located approximately 4,000 feet upriver (northwest) from the Boathouse site, and is located adjacent to the C&O Canal National Historic Park. The parcel was CSX railroad property before being conveyed to the University in the mid-1980's.

The Commission approved the land transfer and determined that the development of the boathouse on Tract 102-114 was consistent with the applicable policies outlined in the Federal Elements of the Comprehensive Plan for the National Capital and determined that it would not negatively affect the Potomac River Waterfront, the Georgetown Waterfront Park or the C&O Canal National Historic Park. However, the Commission's approval was not deemed effective until the completion of the Section 106 process. This process was concluded by the signing of a Memorandum of Agreement (MOA) in 1998 by C&O Canal National Historic Park, the National Park Service, State Historic Preservation Office, and the Advisory Council on Historic Preservation. The executed MOA is an attachment to this report.

EVALUATION

Under Section 8 of the National Capital Planning Act, NCPC has a review role over all proposed Zoning Commission actions to assess and report on whether or not an action will negatively affect identified federal interests. In this instance, the federal interests include the Potomac River Waterfront, which is identified as an area of federal interest under the Federal Elements of the Comprehensive Plan for the National Capital; the C&O Canal National Historic Park, which lies directly east of the subject site; and the MOA concerning the land exchange as described above. This evaluation section will cover the application of the W-0 Zone to Tract 102-114. However, because of the 1995 Commission action and the resulting MOA, there is a federal interest in the boathouse project, so this evaluation will address the boathouse as presented to the Zoning Commission in the public record.

Zoning Map Amendment

Staff's evaluation concludes that the map amendment to zone the 1.09 acres of land to W-0 would not negatively affect the federal interest. As outlined in the staff report for the concurrent case ZC 02-42, the zoning district is not inconsistent with the policy objectives outlined in the Parks, Open Space, and Natural Features Element of the Comprehensive Plan for the National Capital. The zoning regulation permits recreational and low intensity uses, but only at a height and intensity that is appropriate for the enhancement of Potomac River Waterfront. Further, the zoning district is appropriate in this location as it is a buffer between the developed portions of the Georgetown Waterfront, which is zoned W-1 (moderate density) and the C&O Canal National Historic Park, which is federal land. The W-0 zoning acts as a transitional zone, reducing density from the W-1 district to the C&O park land. As such, the map amendment will not negatively affect the C&O Canal National Historic Park, or the Potomac River Waterfront. Accordingly, **staff recommends that the Commission conclude that the proposed zoning map amendment to zone 1.09 acres of land to W-0, Waterfront Open Space, would not negatively affect the federal interests, nor be inconsistent with the Federal Elements of the Comprehensive Plan for the National Capital.**

Georgetown Boathouse

The NCPC Commission action in September of 1995 approved the exchange of lands between the University and the NPS. In approving the exchange, the Commission approved the use of Tract 102-114 as a boathouse for Georgetown University. At that time, no designs for the boathouse were presented. However, the approval of the exchange was made effective upon the completion of the Section 106 process, which included consultation and the execution of a Memorandum of Agreement (MOA) to be signed by NPS, the University, the D.C. State Historic Preservation Office, and the Advisory Council on Historic Preservation.

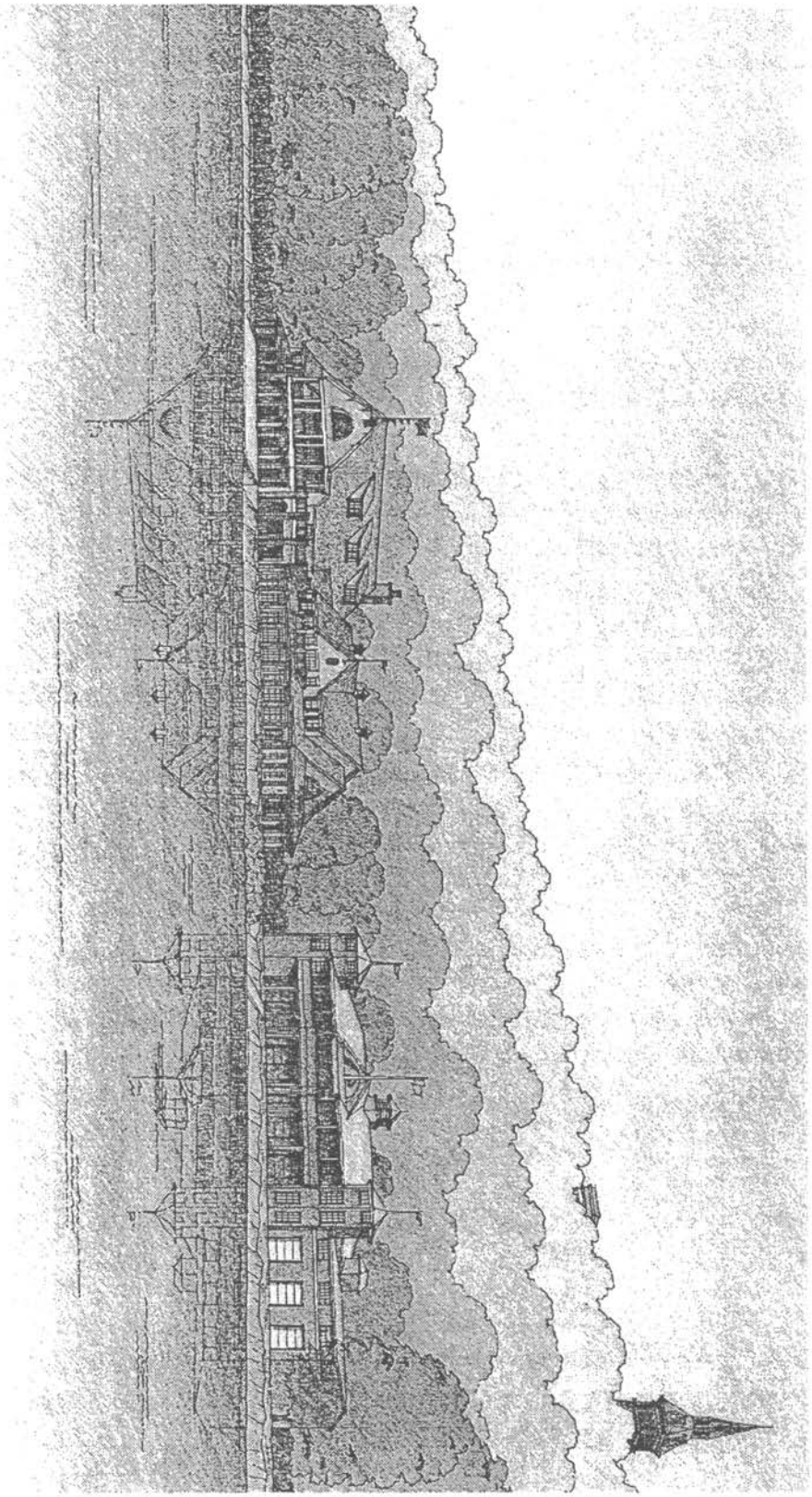
The MOA stipulated that the building footprint for the boathouse should not exceed 15,000 square feet in area, nor 40 feet in height. The design will be reviewed by the signatories for consistency with the terms of the MOA prior to issuance of a building permit. Staff notes, however, that the design as currently proposed is not in conformance with the MOA, and that conformance to federal law under Section 106 is a federal interest. According to the design as currently proposed, the boathouse measures 19,500 square feet, rather than the 15,000 stipulated in the MOA. The proposed building height is 54 feet, rather than the 40 feet stipulated in the MOA. However, it does conform to the proposed W-0 zoning. Under the proposed zoning, the building can be measured from finished grade to the ceiling of the uppermost story. In the case of the boathouse, this dimension is 40 feet. However, staff's interpretation of the MOA is that measurement of height should be based on the overall exterior height of the structure.

The MOA and the design of the boathouse can be brought into agreement either through the redesign of the boathouse or the renegotiation of the MOA. Staff recommends that regardless of which approach is taken, the National Park Service be advised that the Georgetown Boathouse **must comply** with the Memorandum of Agreement resulting from the Section 106 process required for the exchange of lands between the National Park Service and Georgetown University as approved by the National Capital Planning Commission on September 7, 1995.

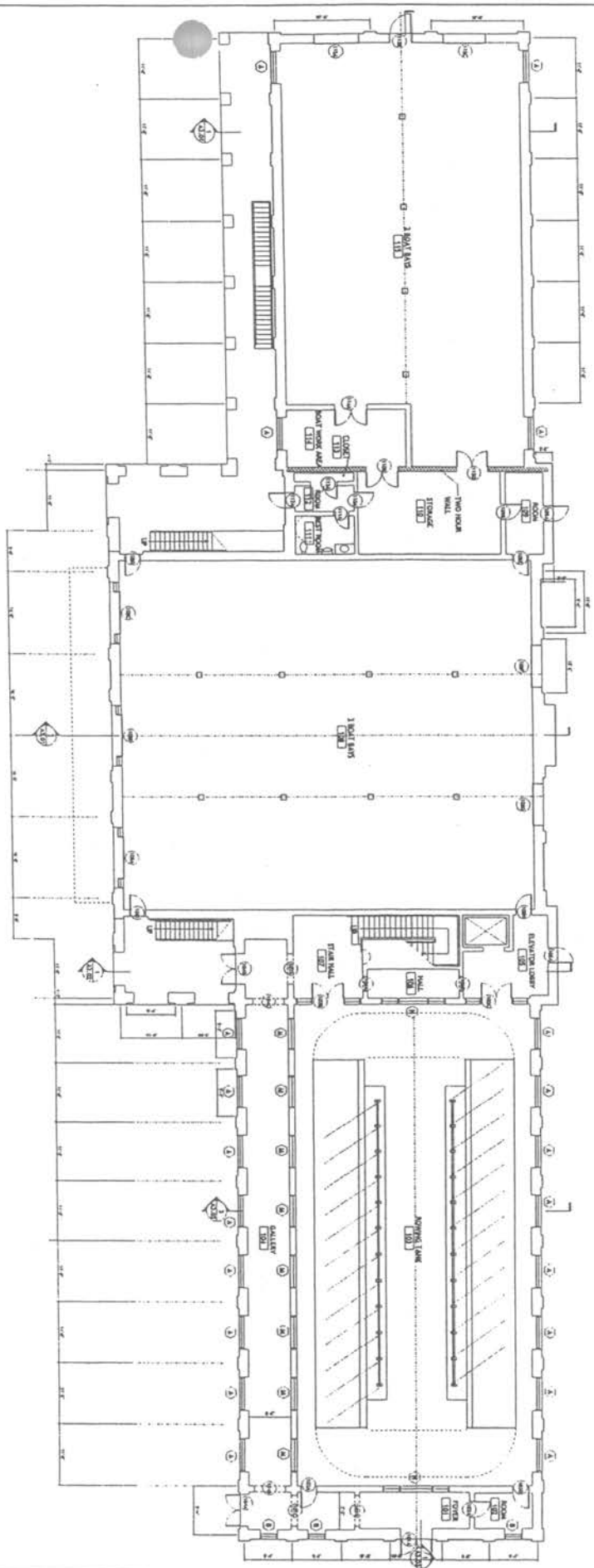
GEORGETOWN UNIVERSITY

NEW NON-MOTORIZED BOATHOUSE

WATER STREET, N.W. WASHINGTON D.C.

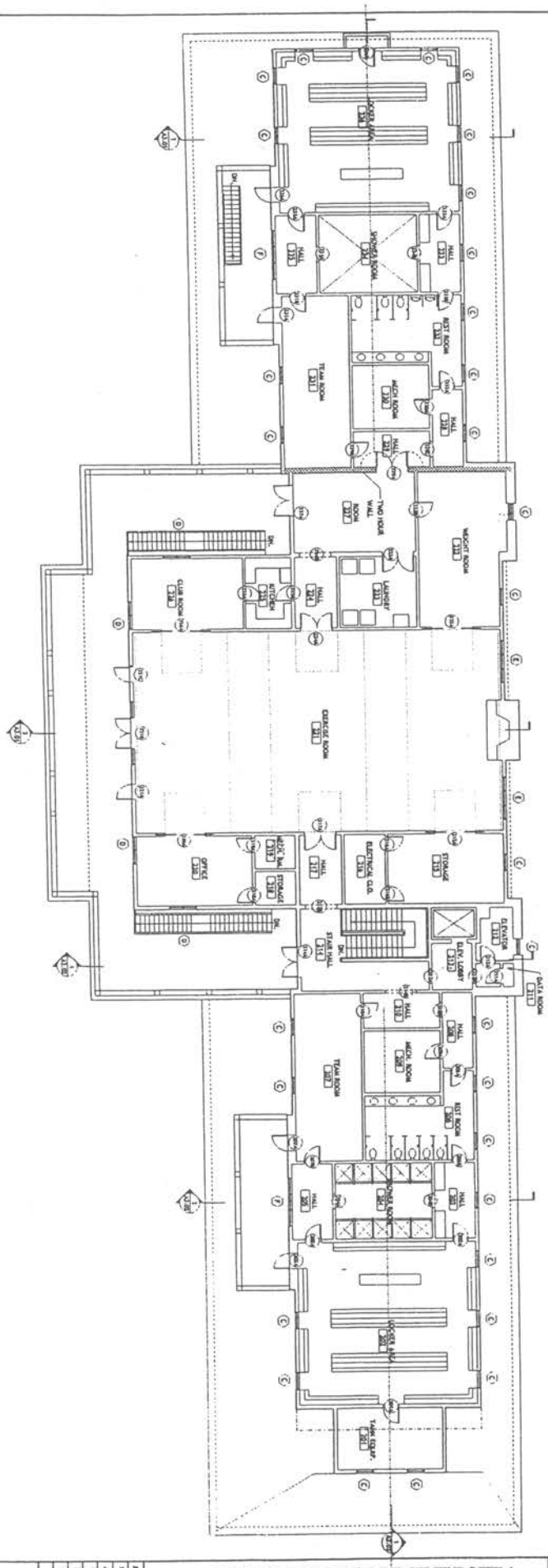


A0.01		COVER SHEET		GEORGETOWN UNIVERSITY NEW NON-MOTORIZED BOATHOUSE WATER STREET, N.W. WASHINGTON D.C.	MUSE ARCHITECTS 3600 CONNECTICUT AVE., NW, WASHINGTON, DC 20015 202.966-6266 OEHRBERTY GRAHAM LANDSCAPE ARCHITECTURE - 220 Prince Street, Annapolis, MD 21401 - Tel. 30,666-5330 BHLIBRYRYAN, INC. (Structural Engineering Consultant) - 1451 Dolley Madison Blvd, #200, McLean, VA 22101 - Tel. 703.637.8681 AJ ENGINEERS, INC. (Mechanical Engineering Consultant) - 4301 Evergreen Lane, (Suite 204, Annandale, VA 22003- Tel. 703.914.1416 A. MORTON THOMAS & ASSOCIATES (Civil Engineering Consultant) - 12750 Twinbrook Parkway, Rockville, MD 20852 - Tel. 301.881.2545

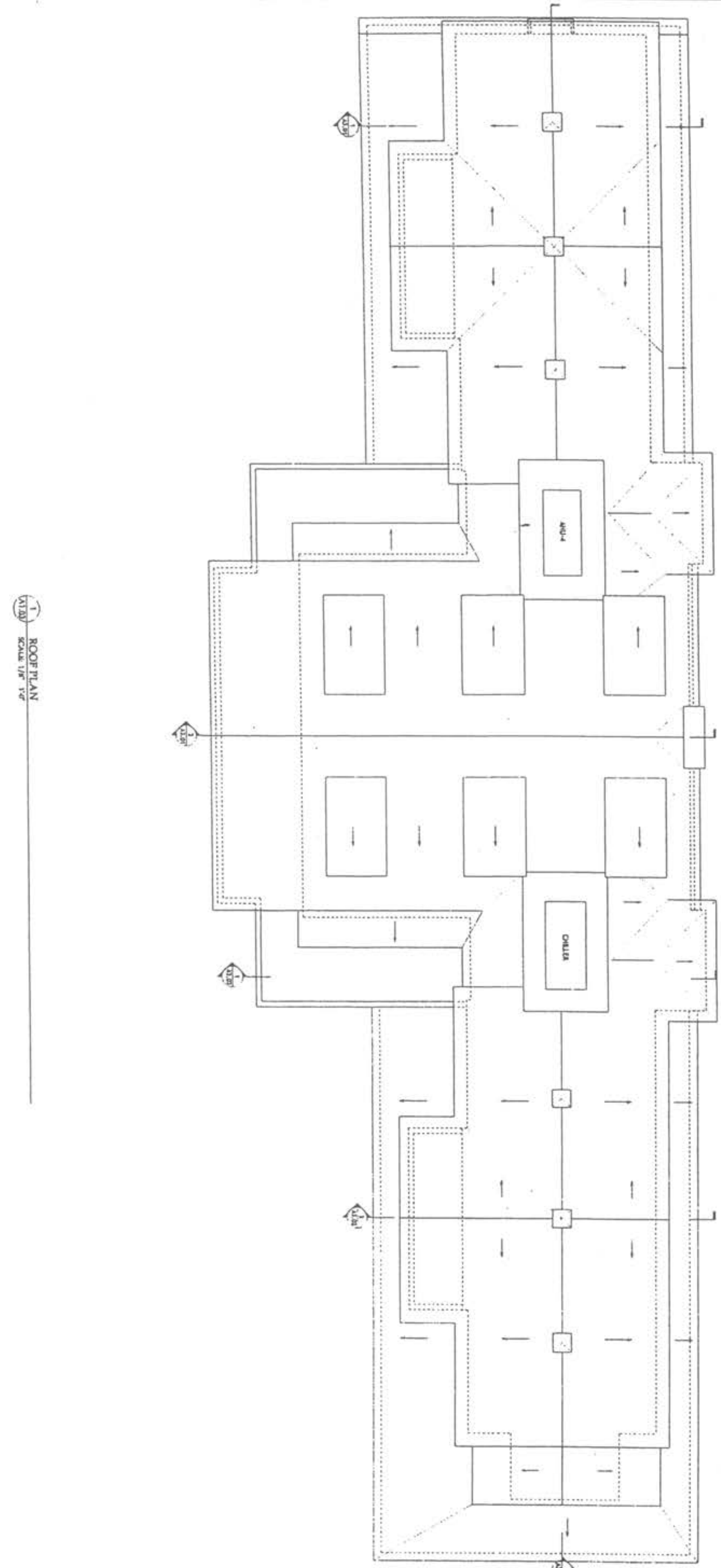


A1.01 FIRST FLOOR PLAN
SCALE: 1/8" = 1'-0"

A1.01	FIRST FLOOR PLAN SCALE: 1/8" = 1'-0"	JULY 15, 2002 JUNE 28, 2002 MAY 16, 2002 APRIL 30, 2002 APRIL 16, 2002 MARCH 26, 2002 FEBRUARY 26, 2002	GEORGETOWN UNIVERSITY NEW NON-MOTORIZED BOATHOUSE WATER STREET, N.W. WASHINGTON D.C.	MUSE ARCHITECTS 9430 CONNECTICUT AVE., NW, WASHINGTON, DC 20015 202.966-6266 O'DONNELL GRAHAM LANDSCAPE ARCHITECTURE - 229 Prince Street, Annapolis, MD 21401 - Tel. 301.808-5316 BLAKE/BRYAN, INC. (Structural Engineering Consultant) - 1601 Dolley Madison Blvd, #220, McLean, VA 22101 - Tel. 703.827.9552 AJ ENGINEERS, INC. (Mechanical Engineering Consultant) - 4301 Evergreen Lane, Suite 204, Annandale, VA 22003 - Tel. 703.919.1166 A. MORTON THOMAS & ASSOCIATES (Civil Engineering Consultant) - 12739 Twinbrook Parkway, Rockville, MD 20852 - Tel. 301.881.2545



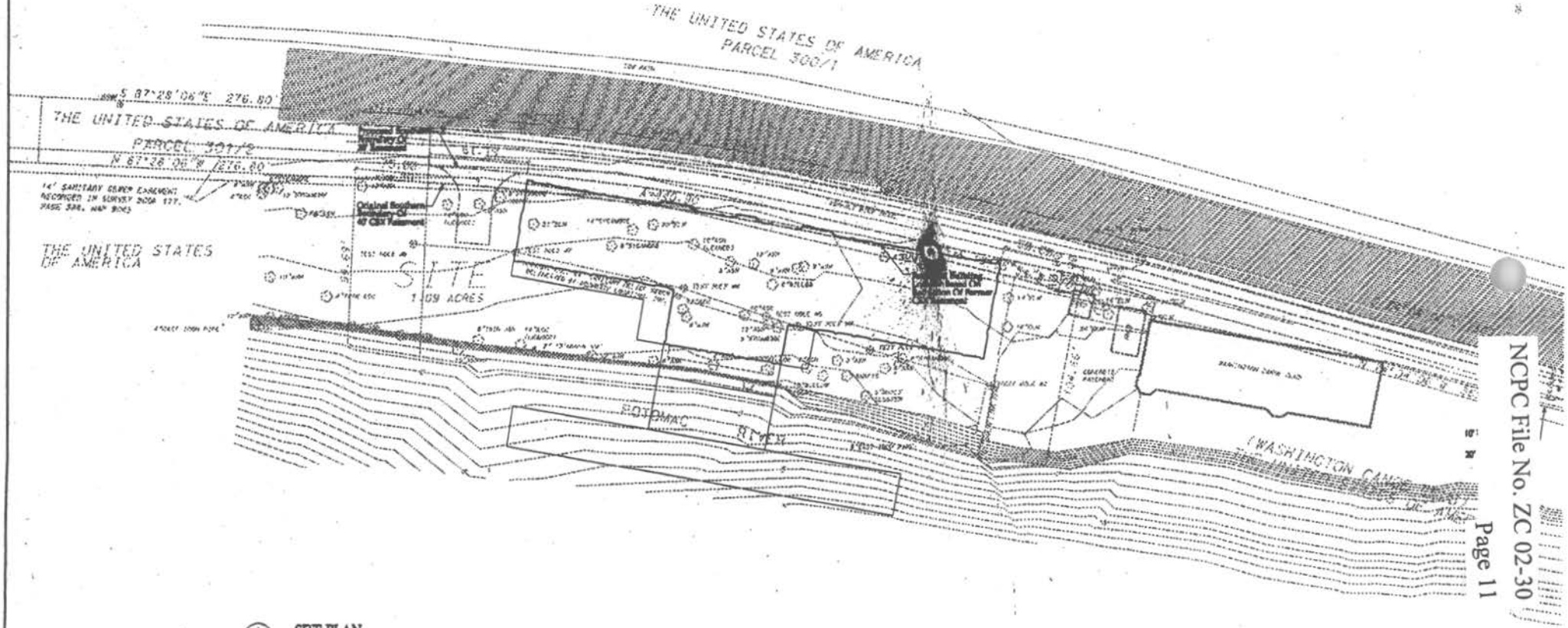
A1.02	SECOND FLOOR PLAN SCALE: 1/8" = 1'-0"	JULY 11, 2003 JUNE 16, 2003 MAY 16, 2003 APRIL 16, 2003 MARCH 26, 2003 FEBRUARY 26, 2003	GEORGETOWN UNIVERSITY NEW NON-MOTORIZED BOATHOUSE WATER STREET, N.W. WASHINGTON D.C.	MUSE ARCHITECTS 3430 CONNECTICUT AVE., NW, WASHINGTON, DC 20015 202.966-6266 O'DONNERTY GRAHAM LANDSCAPE ARCHITECTURE - 229 Prince Street, Annapolis, MD 21401 - Tel. 301.858-1250 RUKLEKUKYAL, INC. (Structural Engineering Consultant) - 3401 Dolley Madison Blvd, 1220, McLean, VA. 22101 - Tel. 703.827.0002 AJ ENGINEERS, INC. (Mechanical Engineering Consultant) - 4304 Evergreen Lane, Suite 204, Annandale, VA. 22003 - Tel. 703.974.1436 A. MORTON THOMAS & ASSOCIATES (Civil Engineering Consultant) - 12730 Twinbrook Parkway, Rockville, MD 20852 - Tel. 301.881.2545



A1.03	ROOF PLAN SCALE: 1/8" = 1'-0"	JULY 11, 2002 JUNE 10, 2002 MAY 16, 2002 MAY 8, 2002

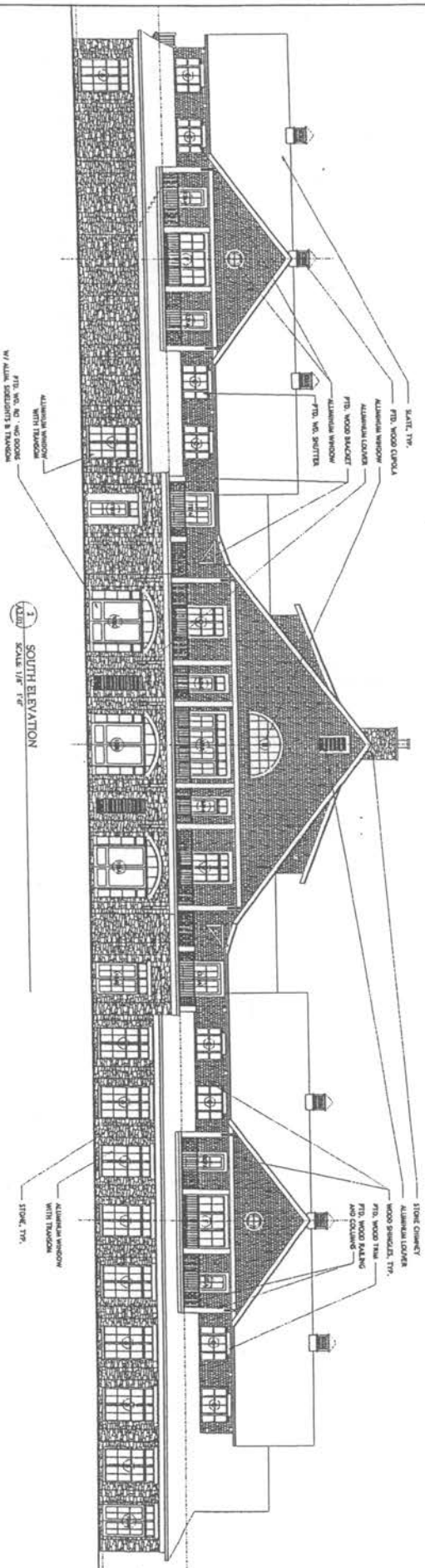
GEORGETOWN UNIVERSITY
NEW NON-MOTORIZED BOATHOUSE
WATER STREET, N.W. WASHINGTON D.C.

MUSE ARCHITECTS
CONNECTICUT AVE., NW, WASHINGTON, DC
O'DONNELL GRAHAM LANDSCAPE ARCHITECTURE
A. MORTON THOMAS & ASSOCIATES (Civil Engineering Consultant)

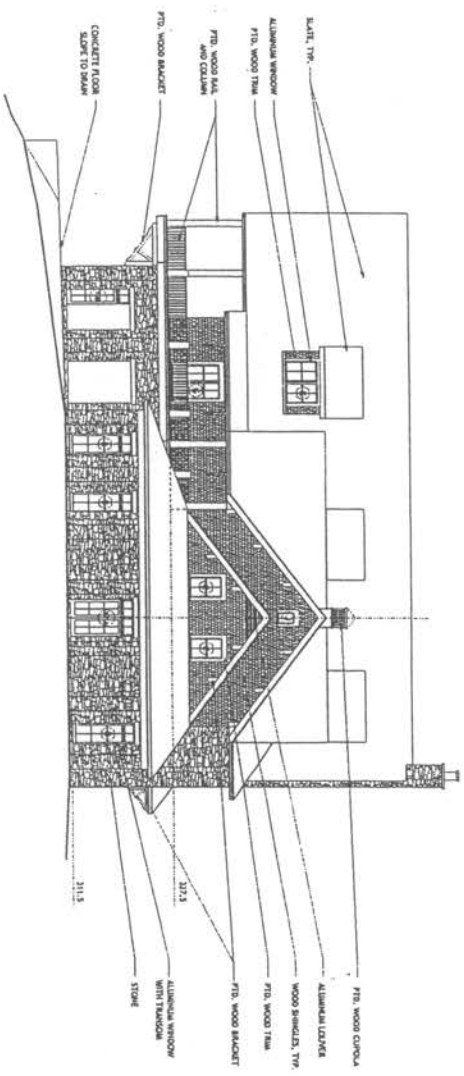


1 SITE PLAN

SCALE: 1" = 40'



1 A2.01 SOUTH ELEVATION
SCALE: 1/8" - 1'-0"



1 A2.01 EAST ELEVATION
SCALE: 1/8" - 1'-0"

A2.01

ELEVATIONS

SCALE: 1/8" - 1'-0"

MARCH 30, 2005
APRIL 14, 2006
MAY 16, 2006
JUNE 16, 2006
JULY 11, 2006

GEORGETOWN UNIVERSITY
NEW NON-MOTORIZED BOATHOUSE
WATER STREET, N.W. WASHINGTON D.C.

MUSE ARCHITECTS
5630 CONNECTICUT AVE., NW, WASHINGTON, DC 20015 202.966-6266
O'DONNELL GRAHAM LANDSCAPE ARCHITECTURE - 329 Prince Street, Annapolis, MD 21401 - Tel. 301.858-0330
SHLEETBRYAN, INC. (Structural Engineering Consultant) - 1451 Dolley Madison Blvd. #210, McLean, VA 22101 - Tel. 703.827.9692
AJ ENGINEERS, INC. (Mechanical Engineering Consultant) - 4301 Evergreen Lane, Suite 304, Annandale, VA 22003 - Tel. 703.914.3438
A. MORTON THOMAS & ASSOCIATES (Civil Engineering Consultant) - 12750 Twinbrook Parkway, Rockville, MD 20852 - Tel. 301.881.2345

MEMORANDUM OF AGREEMENT

WHEREAS, the National Park Service proposes to enter an agreement which may lead to the transfer of property located within the boundaries of the C&O Canal National Historical Park (C&O Canal) to Georgetown University (the University), for use as a site for a non-motorized recreational boathouse, in exchange for which the National Park Service shall receive an undeveloped parcel of property which is owned by the University and located within an undeveloped area of the C&O Canal; and

WHEREAS, the National Park Service's acquisition of this undeveloped property, which is located in a pristine area of the Potomac Palisades, furthers National Park Service goals; and

WHEREAS, longstanding National Park Service studies identify the property proposed to be transferred to the University in this exchange as a potential site for a non-motorized recreational boathouse; and

WHEREAS, the National Park Service intends that the proposed property to be transferred to the University only be developed with a non-motorized recreational boathouse of a certain style and size and a specific landscape design; and

WHEREAS, the proposed property to be transferred to the University is located on the Georgetown Waterfront and identified as Element 14 of the Georgetown Waterfront Master Plan, and is adjacent to property contained on the National Register of Historic Places; and

WHEREAS, the D.C. State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (the Council) have approved the Georgetown Waterfront Master Plan; and

WHEREAS, the National Park Service has consulted with the District of Columbia SHPO and the Council pursuant to the regulations (36 C.F.R. Part 800 (1996)), implementing Section 106 of the National Historic Preservation Act (16 U.S.C. § 470f (1994)) concerning this undertaking which is the agreement and the possible exchange of real property; and

WHEREAS, the District of Columbia Historic Preservation Review Board determined at its October 26, 1995, meeting that the proposed land exchange may have a potential for an adverse effect on historic properties; and

WHEREAS, the National Park Service seeks to avoid any potential adverse effects on any historic properties which could result from this undertaking,

NOW THEREFORE, to address the potential effect on historic properties by this undertaking which is the agreement and proposed land exchange, the National Park Service, the District of Columbia SHPO, and the Council enter this Memorandum of Agreement, agreeing, in accordance with 36 C.F.R. § 800.6(a)(1)(i) (1996), that the undertaking be with the following stipulations:

STIPULATIONS

1. The above-described agreement between the National Park Service and the University which may result in a land exchange shall contain the following provisions concerning the parcel that the University would receive:

a. Design requirements that the appearance of any facility on this site, be generally consistent with that of either "Boathouse Row" on the Schuylkill River, in Philadelphia, Pennsylvania, or those of Northeastern University (excluding size as this facility will be larger); that the facility's footprint or aggregate footprints are not more than 15,000 square feet for a building rising no more than 40 feet above grade.

b. That approval by the Commission of Fine Arts, the National Capital Planning Commission, District of Columbia Zoning Commission, the District of Columbia Historic Preservation Review Board, and other authorities (the Authorities), if within the jurisdiction of such Authorities, of a zoning classification to permit such use of the site for non-motorized boating and ancillary recreational uses and of the design of the boathouse facilities to be constructed will be necessary in order to allow the University to make such use of this site, and that the University must obtain such zoning and other approvals as may be required for this specific development and use of the site.

c. That prior to submitting the designs to the Authorities for approval, the University shall obtain the approval of the National Park Service of such design.

d. That the National Park Service and the University shall work cooperatively, reasonably, and in good faith to adopt both a boathouse design and landscaping scheme agreeable to both.

2. The deed for the property transferred to the University shall contain similar restrictions and conditions pertaining to the use of the site.

3. The agreement and the deeds shall be recorded in the lands records for the District of Columbia.

4. That disputes arising pursuant to this Memorandum of Agreement shall be resolved as follows:

a. Should any party to this Memorandum of Agreement object within thirty (30) days after receipt, to documents relating to the undertaking which is the agreement between the National Park Service and possible exchange of real property, which are provided for review pursuant to this Memorandum of Agreement, or to the manner in which this Memorandum of Agreement is being implemented, the National Park Service shall consult with the objecting party to resolve the objection. If the National Park Service determines that the objection cannot be resolved, the National Park Service shall forward all pertinent documentation to the Council. Within thirty (30) days after receipt of this documentation, the Council shall either:

(1) provide recommendations to the National Park Service, which the National Park Service shall take into account in reaching a final decision regarding the dispute; or

(2) notify the National Park Service that it will comment pursuant to 36 C.F.R. § 800.6(b)(1996). Any Council comment provided in this context, in reference to the subject of the dispute, will be taken into account by the National Park Service in accord with 36 C.F.R. § 800.6(c)(2)(1996);

Any Council recommendation or comment will be understood to pertain only to the subject of the dispute; the National Park Service's responsibility to carryout all actions under this Memorandum of Agreement that are not the subject of the dispute shall remain unchanged.

EFFECT OF THIS AGREEMENT

Execution of this Memorandum of Agreement evidences that the National Park Service has afforded the Council an opportunity to comment on the undertaking which is the agreement and the proposed land exchange between the National Park Service and the University, such land exchange possibly leading to the University developing the property it receives for a non-motorized recreational boathouse, and on this land exchange's effects on historic properties, and that the National Park Service has taken into account the effects of the undertaking on historic properties.

This Memorandum of Agreement is effective on the date of the last signature affixed here

Douglas D. Faris
Superintendent
C&O Canal National Historical Park

8/20/97
Date

Terry R. Carlstrom
ACTING Regional Director
National Park Service, National Capital Region

8-15-97
Date

State Historic Preservation Officer
District of Columbia

Date

John M. Fowler
Executive Director
Advisory Council on Historic Preservation

8/15/97
Date

Ian G. Litmans
1517 Live Oak Drive
Silver Spring, MD 20910

NCPC
File No. 2.C 0230
Primary Action
Date Date
Copies:

National Planning Commission
401 9th Street, NW, Suite 500
Washington, D.C., 20576

Ref: ZC 02-30

October 21, 2003

Dear Commission Members:

It is with great interest that I write to you regarding the proposed Georgetown boathouse. I am extremely concerned that this boathouse, if built, will permanently and substantially affect the proposed area in a negative way. I have paddled on the Potomac for years, and in fact asked my wife for her hand in marriage in a canoe on it. This building will ruin the view and severely limit it from many locations, could severely damage the C&O Canal, and in general is entirely inappropriate for this location. NCPC is responsible for preserving the scenic views and area west of Key Bridge. If you rubber-stamp this zoning issue you will be doing a great disservice to the people of Washington, to yourselves, your organization and most importantly, to the area which you are charged with preserving.

Why would you allow construction so close to the C&O Canal without an engineering analysis? This seems unfathomable and scandalous to me. Would you allow an untrained mechanic to work on your car without schematics? NCPC clearly and repeatedly states the importance of the C&O Canal and the importance of its preservation. This boathouse does nothing for the preservation and common sense dictates that it in fact puts it at great jeopardy.

Why would you allow the construction of a "conspicuous" structure west of Key Bridge (which isn't supposed to happen according to your own plans). This will destroy the sightlines from the GW Parkway, the Key Bridge, from the river and from the C&O Canal. This building is 50+ ft tall, 300 ft long and 85 feet wide. To put a structure like that in perspective, if you put it in a football stadium, it would cover the full length and half the width of the playing field and be the equivalent height of a 5-story home. If that is not conspicuous I do not know what is.

Why would you allow a building 7-8 times larger than it's neighbor, when that's obviously not needed. Thompson's Boat House houses 2000 athletes; this is for 170. Thompsons is half the size of the proposed GU Boathouse. Surely Georgetown does not need a facility this large for 170 athletes, when other Universities seem to flourish and prosper with smaller facilities more in tune with their surroundings. Perhaps most importantly, why is the need of Georgetown's rowers more important than needs of the people who live, work and recreate here. Sharing the river and the view is one thing, but this is certainly not the case here.

Allowing Georgetown to build this boathouse as the design currently stands is unconscionable and I sincerely hope that you will do what is right. This building offers no public benefit whatsoever when compared to all that it takes away.

I sincerely hope that you will do what is right and not zone W-0. I thank you for your time and consideration.

Sincerely,



Ian Litmans

Young, Deborah B.

From: NCPC Public Affairs
Sent: Thursday, October 30, 2003 12:28 PM
To: Altman, Hillary L.; Zaidain, David
Cc: Brown, Priscilla A.; Young, Deborah B.; MacSpadden, Lisa M.
Subject: FW: NCPC-ZC 02-30

-----Original Message-----
From: DOLORES MILMOE [mailto:dmilmoe@audubonnaturalist.org]
Sent: Thursday, October 30, 2003 12:25 PM
To: info@ncpc.gov
Subject: NCPC-ZC 02-30

To the NCPC Commissioners:
The Audubon Naturalist Society, the region's oldest conservation group, wishes to echo the sentiments in the attached letter sent by Sally Strain of the Defenders of Potomac River parkland. It is very disheartening to see the erosion of public parkland by the very institution set up to safeguard important national legacies. The National Park Service should not be in the business of swapping significant C & O parkland for the purpose of building a boathouse for a private institution. There are viable alternatives.
Sincerely,
Dolores Milmoe
Conservation Advocate, Audubon Naturalist Society

Dear Commissioners:
Re: ZC 02-30 Amendment to the Zoning Map of the D.C. to zone an unzoned vacant parcel fronting on the Potomac River consisting of Tract 102-114, approximately 1/4 mile west of the Key Bridge, to W-O Open Space for the Georgetown University Boathouse.
This letter is to express my strong opposition to the above-mentioned proposal, for the following reasons:
* Tract 102-114, at the "Gateway" to the C&O Canal National Historical Park, is valued by hikers, bikers, boaters, fishermen, naturalists, commuters, neighbors, tourists, historians-and others-and should remain in the public domain
* Only three miles of the C&O Canal National Historical Park are in the District of Columbia, and every square inch is worth protecting from development for private use.
* There are better alternative locations for the development of private boathouses-on degraded land outside the Park, begging for redevelopment.
* Instead of creating "Open Space," the zoning and development of this section of parkland as a private boathouse would actually create "Closed Space." The huge boathouse and dock proposed for this site would: block the views of the River and shoreline from the Towpath and Capital Crescent Trail; modify the view of the natural shoreline from the National Heritage Trail in Virginia (as well as from the Key Bridge); hinder the route of shoreline paddlers; add to the traffic along an already busy recreational corridor; and change open space into a cement jungle.
* The River shoreline along this Tract is tidal and subject to flooding, and an 84-inch corroding sewer line runs underground, carrying sewage from Virginia, Maryland and the District of Columbia-factors that are unfavorable to construction projects.
* The historic Canal bank nearby is fragile and leaking.
* Safety considerations related to building, servicing, maintaining and using any type of structure on this narrow section of land -- squeezed between the River and the Capital Crescent Trail-are unknown and unnecessary.
* Traffic and parking needs during and after construction are unpredictable, and no traffic study has been produced-or reviewed by the public.
* Development of this Tract is inconsistent with the 1987-National Park Service approved document, "The Georgetown Waterfront Park and the C&O Canal," which states: "Above Key Bridge, west of the boundary of the designated boathouse area, the natural conditions of the palisades will be preserved. The Potomac River above Key Bridge is one of the main scenic treasures of the Nation's Capital, and no new

development will be permitted this area. . . .
For these reasons, and others, I hope you will vote "no" to zoning this public urban parkland for private development.
Sincerely,

Sally C. Strain, Palisades resident and Member, Defenders of Potomac River Parkland
5712 Sherier Pl., NW
Washington, DC 20016

Young, Deborah B.

From: NCPC Public Affairs
Sent: Thursday, October 30, 2003 10:18 AM
To: Altman, Hillary L.; Zaidain, David
Cc: Brown, Priscilla A.; MacSpadden, Lisa M.; Young, Deborah B.
Subject: FW: Comments on NCPC-ZC 02-30

-----Original Message-----
From: John.Goodrow@USPTO.GOV [mailto:John.Goodrow@USPTO.GOV]
Sent: Thursday, October 30, 2003 10:12 AM
To: info@ncpc.gov
Subject: Comments on NCPC-ZC 02-30

Dear Commissioners:
I strongly oppose the development of tract 102-114 as do many of the groups that have expressed their opposition to the Georgetown Univ.
Boathouse as shown below:
American Canoe Club
American Hiking Society
American Rivers
Association of State Floodplain Managers Burleith Citizens Assn..
Canoe Cruisers Assn.
C&O Canal Assn.
Chesapeake Paddlers
Coalition for the Capital Crescent Trail
Committee of 100 for the Federal City
Defenders of Wildlife
Foxhall Citizens Assn.
Glover Park Citizens Assn.
National Parks Conservation Assn.
National Recreation and Parks Assn.
National Trust for Historic Preservation
Natural Resources Defense Council
The Nature Conservancy
North American Water Trails
Palisades Citizens Assn.
Parks and People
Piedmont Environmental Council
Potomac Appalachian Trail Club
Potomac Peddlers Touring Club
Potomac Riverkeeper
Public Employees for Environmental Responsibility
Rails-to-Trails Conservancy
River Network
Scenic America
Sierra Club
Sycamore Island Canoe Club
Washington Area Bicyclist Assn.
Washington Canoe Club
The Waterfront Center

Each of the above groups have good reasons for their opposition to the transfer of the park land to private interests.
The National Park Service (NPS) wants to transfer ownership of the parkland to Georgetown University (GU) for a 40 X 1000 foot up-river parcel. It is a bit odd that GU ever obtained the up-river parcel. This is a time line of the parcel's ownership. The land was taken from citizens by eminent domain by the railroad now owned by CSX. On Nov. 21, 1989 CSX sold the DC portion to the Georgetown Branch Foundation (a.k.a. Kingdon Gould). In that transfer, they excluded an easement for ingress/egress, as well as the up river 40 X 1000 section which would be given to GU in 1991 (along with access rights over said easement). On Nov. 20, 1990, the Georgetown Branch Foundation sold what it had bought a

year earlier to the NPS. The (after the NPS recorded the t: e in the District of Columbia, GU recorded their gift of land in the District of Columbia. Why didn't the NPS which surely knew of the easement and its incompatibility with the future Park use such as the Capital Crescent Trail, go to CSX in 1989 or 1990 and acquire the up river parcel and the easement? Was there a prearranged land swap? Was GU thinking faster than NPS and got CSX to hold that parcel and easement from the sale and two years later give the land to GU? Yes, it's a bit odd.
Tourists, commuters, neighbors , hikers, bikers, and children of the future do not want to loose anymore park land in the Distinct of Columbia. Every square inch is worth protecting from development for private use.

Sincerely,

John Goodrow

Young, Deborah B.

From: NCPC Public Affairs
Sent: Thursday, October 30, 2003 12:26 PM
To: Altman, Hillary L.; Zaidain, David
Cc: Brown, Priscilla A.; Young, Deborah B.; MacSpadden, Lisa M.
Subject: FW: NCPC - ZC 02-30

-----Original Message-----
From: McClellan, Jimmie R. [mailto:jmcclellan@nvcc.edu]
Sent: Thursday, October 30, 2003 12:05 PM
To: 'info@ncpc.gov'
Cc: 'wcanoe@wcanoe.org'; 'seawalk@starpower.net'
Subject: NCPC - ZC 02-30

Dear Commissioners,

It would be a mistake to allow the wooded area upstream from the Washington Canoe Club along the bank of the Potomac to be developed. The land there is one of the few places left in a natural state along the river within the District of Columbia. The loss of this forested area would more than negate any gains that might accrue from the construction of a boathouse and fundraising center for Georgetown University.

I am a historian and enjoy seeing the stretch of river from the Washington Canoe Club to Fletchers. It makes it easy to visualize how the area looked before the first tobacco wharfs were built just downstream in the mid-18th century. Just up stream from the Club is the cut made for the incline that brought barges and canal boats down to the river from the Canal above. The cut still is outlined by the stonework of 19th century craftsmen. The Canal itself, which forms the interior border of this tract of land, is a great historical treasure and special care should be taken to protect its fragile state.

It would be tragic to make a decision that would forever alter the nature of this stretch of the river and preclude future generations, living in a world with ever decreasing green space, from enjoying this beautiful area.

There is no compelling reason for the development of this area. There are alternatives locations downstream where the Georgetown facility might more logically be built.

Sincerely,
Jim McClellan, PhD
Professor of History
Northern Virginia Community College

Young, Deborah B.

From: NCPC Public Affairs
Sent: Thursday, October 30, 2003 12:27 PM
To: Altman, Hillary L.; Zaidain, David
Cc: Brown, Priscilla A.; MacSpadden, Lisa M.; Young, Deborah B.
Subject: FW: NCPC-ZC 02-30

-----Original Message-----
From: Cliff Farbstein [mailto:cliff@dimension-corp.com]
Sent: Thursday, October 30, 2003 12:10 PM
To: info@ncpc.gov
Subject: NCPC-ZC 02-30

Dear Commissioners:

Re: ZC 02-30 Amendment to the Zoning Map of the D.C. to zone an unzoned vacant parcel fronting on the Potomac River consisting of Tract 102-114, approximatrely 1/4 mile west of the Key Bridge, to W-O Open Space for the Georgetown University Boathouse.

I strongly oppose the above-mentioned proposal, for the following reasons:

- Tract 102-114, at the "Gateway" to the C&O Canal National Historical Park, is valued by hikers, bikers, skaters, boaters, fishermen, naturalists, commuters, neighbors, tourists, historians - and others - and should remain in the public domain

- Only three miles of the C&O Canal National Historical Park are in the District of Columbia, and every square inch is worth protecting from development for private use.

- There are better alternative locations for the development of private boathouses -- on degraded land outside the Park, begging for redevelopment.

- Instead of creating "Open Space," the zoning and development of this section of parkland as a private boathouse would actually create "Closed Space." The huge boathouse and dock proposed for this site would: block the views of the River and shoreline from the Towpath and Capital Crescent Trail; modify the view of the natural shoreline from the National Heritage Trail in Virginia (as well as from the Key Bridge); hinder the route of shoreline paddlers; add to the traffic along an already busy recreational corridor; and change open space into a concrete jungle.

- The River shoreline along this Tract is tidal and subject to flooding, and an 84-inch corroding sewer line runs underground, carrying sewage from Virginia, Maryland and the District of Columbia -- factors that do not favor construction projects, and may also pose hazards for bout house users.

- The historic Canal bank nearby is fragile and leaking.

- Safety considerations related to building, servicing, maintaining and using any type of structure on this narrow section of land -- squeezed between the River and the Capital Crescent Trail -- are unknown and unnecessasry.

- Traffic and parking needs during and after construction are unpredictatble, and no traffic study has been produced -- or reviewed by the public.

- Development of this Tract is inconsistent with the 1987 National Park Service-approved document, "The Georgetown Waterfront Park and the C&O Canal," which states: "Above Key Bridge, west of the boundary of the designated boathouse area, the natural conditions of the palisades will be preserved. The Potomac River above

Key Bridge is one of the main scenic treasures of the Nation's Capital, and no new development will be permitted in this area. . . .

For these reasons, and others, I hope you will vote "no" to zoning this public urban parkland for private development.

Sincerely,

Cliff Farbstein
2120 S. Lowell Street
Arlington, VA 22204

-----Original Message-----
From: Gerardine Albers [mailto:dalbers@bellatlantic.net]
Sent: Thursday, October 30, 2003 9:11 AM
To: info@ncpc.gov
Subject: letter to commission regarding Georgetown University boathouse land exchange ZC 02-30

4000 Massachusetts Ave. NW #1510
Washington, D.C., 20016
October 29,2003

National Capital Planning Commission
401 9th Street, NW, Suite 500
Washington, D. C., 20576

Re: Georgetown University boathouse ZC 02-30

Dear Commissioners:

Deny the zoning change. This public parkland should remain open space. Build this private boathouse downstream.

Discuss this issue after the EIS review.

* Mr. Collier, Chief of Bureau of Environmental Quality states that this project requires an Environmental Impact Statement (EIS). **By law** an EIS review should occur **early** in the planning process so that commissioners can review adverse impacts and alternatives in their decision-making process. (See attached memo from Jim Collier to Joel Larson, May 14, 2003 stating his concerns regarding the project).

* The District of Columbia Historic Preservation Review Board determined that the "proposed land exchange may have a potential for adverse effect on historic properties." For this reason, the agreement requires NCPC and other commissions to diligently review the project and its impacts. An EIS is the foundation for careful review. (Memorandum of Agreement and Letter of Rejection 10/8/98)

The proposed building size will impact views from C&O Canal, GW Parkway and the Potomac River.

* The size of the proposed boathouse is considerably larger than that stated in the original agreement between the National Park Service and DC SHPO which limits the facility's footprint or aggregate footprints to no more than 15,000 square feet for a building rising no more than 40 feet above grade. This proposed boathouse, however, has a footprint of approximately 20,000 square feet-an increase of 33 % over the maximum stated in the MOA. (Memorandum of Agreement and Letter of Rejection 10/8/98).

* The size of the proposed boathouse is double the size of Thompson's boathouse and triple the size of average boathouses.

* The rowing pool in the proposed boathouse does not need to be located on the waterfront.

Thank for considering my request that the commission review this proposal **after an environmental**

review.

Sincerely,

Gerardine Albers

Attachment: letter from Jim Collier, Bureau of Environmental Quality

TO: Joel Lawson, Development Review Specialist, Office of Planning

FROM: Jim Collier, P.E., Chief, Bureau of Environmental Quality

DATE: May 14, 2003

SUBJECT: Zoning Commission Case #02-30-Map amendment to permit the construction of a Georgetown University Rowing Club Boathouse on the Potomac River, and Case #02-31-possible text amendments to the W-1 zone.

The District of Columbia Environmental Policy Act of 1989 states:

Whenever the Mayor or a board, commission, authority, or person proposes or approves a major action that is likely to have substantial negative impact on the environment, if implemented, the Mayor, board, commission, authority, or person shall prepare or cause to be prepared, and transmit, in accordance with subsection (b) of this section, a detailed EIS at least 60 days prior to implementation of the proposed major action....

We believe that the project concerned in the above two cases falls under this Act. Further, it appears that the proposed boathouse project has the potential to negatively affect wetlands, upland terrestrial habitat, and aquatic habitat.

The Office of Planning is tasked with upholding the goals of the District's Comprehensive Plan and **we note that the proposed boathouse project would not further the goals and objectives of the Comprehensive Plan.** Important goals of the Comprehensive Plan are for District residents to increase use of the river for recreation and transportation, and for residents of Ward 2 specifically to increase their use of the river. A private boathouse will not provide increased opportunities for the general public to boat on the river. Building a private boathouse on what is now public access open space will, in fact, decrease such opportunities.

Young, Deborah B.

From: NCPC Public Affairs
Sent: Thursday, October 30, 2003 12:48 PM
To: Altman, Hillary L.; Zaidain, David
Cc: Brown, Priscilla A.; MacSpadden, Lisa M.; Young, Deborah B.
Subject: FW: ZC 02-30

-----Original Message-----
From: Cliff Goldmann [mailto:cliffgoldmann@hotmail.com]
Sent: Thursday, October 30, 2003 12:34 PM
To: info@ncpc.gov
Subject: RE: ZC 02-30

Dear Commissioners:
>
> Re: ZC 02-30 Amendment to the Zoning
> Map of the D.C. to zone
> an unzoned vacant parcel fronting on the
> Potomac River consisting
> of Tract 102-114, approximatrely 1/4 mile
> west of the Key Bridge,
> to W-O Open Space for the Georgetown
> University Boathouse.
>
> This letter is to express my strong
> opposition to the
> above-mentioned proposal, for the
> following reasons:
>
> &nb sp; - Tract 102-114, at the "Gateway" to the
> C&O Canal National
> Historical Park, is valued by hikers,
> bikers, boaters, fishermen,
> naturalists, commuters, neighbors,
> tourists, historians -- and
> others -- and should remain in the public
> domain
>
> - Only three miles of the C&O Canal
> National Historical Park are
> in the District of Columbia, and every
> square inch is worth
> protecting from development for private
> use.
>
> ; - There are better alternative locations
> for the development of

> private boathouses -- on degraded land
> outside the Park, begging
> for redevelopment.
>
> - Instead of creating "Open Space," the
> zoning and development
> of this section of parkland as a private
> boathouse would actually
> create "Closed Space." The huge boathouse
> and dock proposed for
> this site would: block the views of the
> River and shoreline
> from the Towpath and Capital Crescent
> Trail; modify the view of
> the natural shoreline from the National
> Heritage Trail in
> Virginia (as well as from the Key Bridge);
> hinder the route of
> shoreline paddlers; add to the traffic
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> recreational corridor; and change open
> space into a cement
> jungle.
>
> - The River shoreline along this Tract
> is tidal and subject to
> flooding, and an 84-inch corroding sewer
> line runs underground,
> carrying sewage from Virginia, Maryland
> and the District of
> Columbia -- factors that are unfavorable
> to construction
> projects.
>
> - The historic Canal bank nearby is
> fragile and leaking.
>
> - Safety considerations related to
> building, servicing,
> maintaining and using any type of
> structure on this narrow
> section of land -- squeezed between the
> River and the Capital
> Crescent Trail - - are unknown and
> unnecessasry.
>
> - Traffic and parking needs during and
> after construction are
> unpredictatble, and no traffic study has
> been produced -- or
> reviewed by the public.

>
> - Development of this Tract is
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> "The Georgetown
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> states: "Above Key
> Bridge, west of the boundary of the
> designated boat house area,
> the natural conditions of the palisades
> will be preserved. The
> Potomac River above Key Bridge is one of
> the main scenic
> treasures of the Nation's Capital, and no
> new development will be
> permitted in this area. . . .
>
> For these reasons, and others, I hope you
> will vote "no" to
> zoning this public urban parkland for
> private development.
>
> Sincerely,
Clifford and Jessica Taylor
Palisades NW- Washington, DC

Never get a busy signal because you are always connected with high-speed Internet access. Click here to comparison-shop providers.

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

October 30, 2003

Secretary
National Capital Planning Commission
401 9th Street, NW, Suite 500
Washington, D.C., 20576

Dear Commissioners:

It was with interest that I received the notice of the NCPC hearing to be held on November 6th, 2003. Please consider the following regarding ZC 02-30, the zoning of Tract 102-114.

1) Zoning the land W-0 would be in contradiction with prior NCPC guidance regarding construction west of Key Bridge, in particular the February 2001 Comprehensive Plan for the National Capital where you state that "As a great natural area, the Potomac Palisades... should reflect the nature which controlled early settlement in the Region. Conspicuous man-made forms should be avoided upstream from Key Bridge." This zoning will indeed allow a conspicuous structure west of Key Bridge. It is claimed that GU will build further upstream if permission isn't granted on Tract 102-114. Surely the Federal government doesn't have to allow construction there, the upstream site would place the building in a flood plane which is under water a large number of times a year due to it being only 5-6' above the normal high-tide. Certainly you would have to approve that structure as well and thus would be able to reign in such wanton construction. Many people purchase land (or are bequeathed as in the case of Georgetown University), which they subsequently learn they cannot build on. Georgetown Universities upstream site should return to the public trust, perhaps through the Potomac River Foundation.

2) By far the best reason to reject the W-0 zone request is that the DC W-O zoning is not sufficiently restrictive for Tract 102-114. The DC W-O zoning was specifically crafted to allow Georgetown University to develop a 58' tall structure that covers 50% of a 48,000 square foot lot. Interestingly only Boathouses are allowed under W-0 to cover 50% of the lot. Other facilities would only be allowed to cover 25% of the lot. This "Boathouse exception" was specifically made for Georgetown University. Does NCPC really want such a private facility west of Key Bridge? The public doesn't, and would be ill served by such construction, especially when the size is not dictated by rowing needs, but rather Georgetown University desires. Our comments to the DC Zoning Commission regarding the impact to the C&O Canal NHP and the Potomac River Gorge regarding the W-O zone were ignored. We specifically requested that the height only be 30' and that the coverage be kept at 25%. Washington Canoe Club is only 26 feet tall and is thus well below the C&O Canal. The W-O zone will allow buildings to stand 25 feet above the C&O Canal!

3) Tract 102-114 straddles the dividing line between the Georgetown Waterfront Park and the C&O Canal National Historic Park. It is simply inappropriate to zone the C&O Canal NHP W-0. If the building was smaller (as originally proposed and "sold" to the public) it wouldn't need to be situated in the C&O Canal NHP, rather it would fit within the "Non motorized Boathouse Zone" portion of the Georgetown Waterfront Park.

4) While this action may be simply to consider the zoning process, since the design of the building is well known at this point it seems reasonable to mention the following:

a) The proposed structure is enormous, it blocks the views from the C&O Canal, and it will likely endanger the C&O Canal during construction and during floods. Certainly no engineering analysis exists that demonstrates otherwise. It also damages sight lines from the river and the Virginia shoreline.

b) The proposed design was strenuously objected to by the C&O Canal NHP Presidential Advisory Commission along with dozens of other organizations. Mr. Parsons (NCR NPS) had previously and repeatedly claimed to have the Commissions approval. He further used that approval as proof that others did not share our concerns of damage to the C&O Canal NHP. I attended the meeting where he presented the proposed design that all members of the Commission as well as the Supervisor of the C&O Canal NHP Park. In addition to the Commission unanimously voting to raise concerns about the size and height of the structure, Mr. Ferris was heard to loudly comment: "It's too large John".

c) The size of the proposed structure has no legitimate rowing basis. Surely GU doesn't need a boathouse double the size of Thompsons for only 170 students. It's also more than triple the size of the average boathouse and seven times the size of it's nearest neighbor. This structure will not solve the "rowing crisis" caused by the Swedish embassy; it only exacerbates it by raising the red flag. Further, Georgetown has a very small number of "Eights" (16) at Thompsons. GU leaving will do little to solve the space problem.

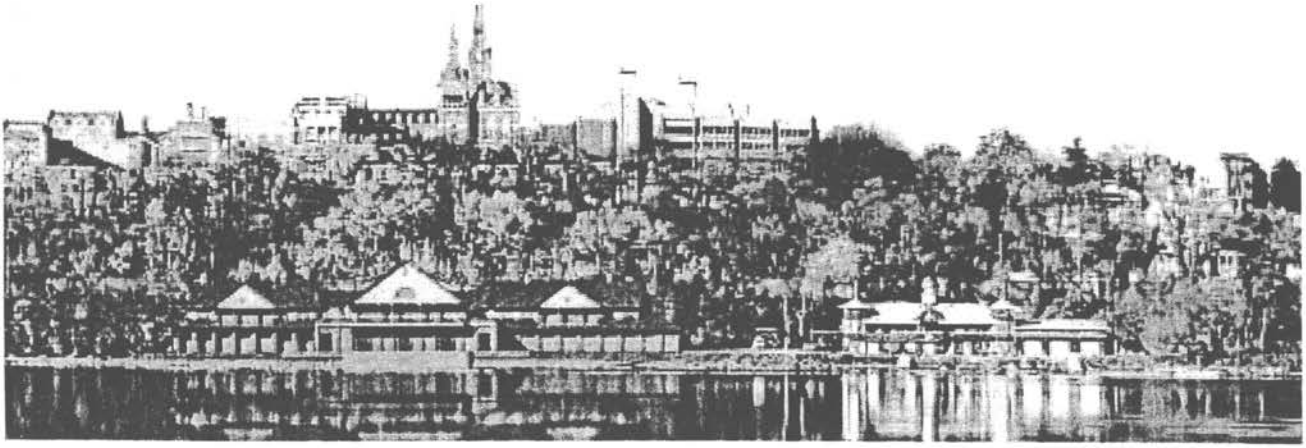
d) Significantly, the NPS, DC SHPO and the ACHP agreed during the Historic Review Process that the building would be 1/3 lower and 2/3rds smaller than proposed. NCPC was a signatory to this 106 process, which the proposed structure violates.

e) The building is so large that by the exchange agreement between NPS and GU, NCPC must approve its encroachment west into the C&O Canal NHP.

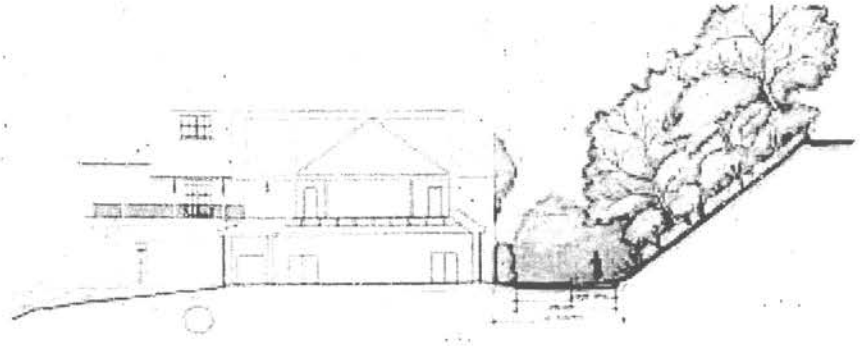
Given the tremendous impact of the private boathouse to the public, and in particular the grand and unnecessary scale of the boathouse it is requested that approval for the W-0 should not be granted. Nor should the encroachment into the C&O Canal NHP be approved. The National Park Service and Georgetown University should be urged to submit a proposal for a structure that is in keeping with the historic nature of the C&O Canal NHP, is similar in size and scale to Washington Canoe Club, Potomac Boat Club and Thompsons Boat Center. Such a structure would not block the views from the C&O Canal, would compliment rather than overwhelm, and wouldn't need to be sited in the C&O Canal NHP.

Very Respectfully and Thank you,
/s/
Larry Schuette
President
Washington Canoe Club
PO BOX 25449
Washington DC, 20007

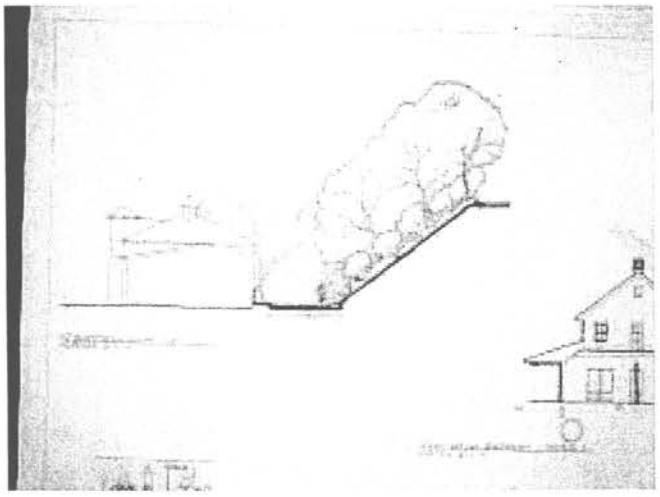
For your consideration, here are some photos of the proposed structure



The photomontage finally provided by Georgetown University in December of 2002.



Side view of the proposed GU Boathouse, 21 feet above the canal and 7 feet above Canal road



Side view showing WCC below the Canal

10-20-03

To whom this may concern:

Please allow the waterfront adjacent to the Washington Canoe Club to remain undeveloped by Georgetown University. This is a beautiful wild land where insects, birds and other wildlife exist. I ride the Capital Crescent Trail daily and look forward to the peace of the trail before facing the urban setting of Georgetown. I am also a 20 year member of the historic Canoe Club. I paddle the river to Fletchers Boat Club and enjoy the lack of anything man-made. The Georgetown Boat Club will erase all this peace and quiet. Please don't allow

this monstrosity and unnecessary "temple" of sports to spoil the now public access to the Potomac River.

Susan Weidman

(202) 857-7141

Young, Deborah B.

From: NCPC Public Affairs
Sent: Thursday, October 30, 2003 5:48 PM
To: Altman, Hillary L.; Zaidain, David
Cc: Brown, Priscilla A.; MacSpadden, Lisa M.; Young, Deborah B.
Subject: FW: NCPC - ZC 02-30

-----Original Message-----
From: Amy Potter [mailto:amy_potter@mac.com]
Sent: Thursday, October 30, 2003 1:28 PM
To: info@ncpc.gov
Cc: amy_potter@mac.com
Subject: NCPC - ZC 02-30

Dear Commissioners:

Re: ZC 02-30 Amendment to the Zoning Map of the D.C. to zone an unzoned vacant parcel fronting on the Potomac River consisting of Tract 102-114, approximatrely 1/4 mile west of the Key Bridge, to W-O Open Space for the Georgetown University Boathouse.

This letter is to express my opposition to the above proposal for the following reasons:
* The gateway to the C&O Canal National Historical Park (Tract 102-114) is located here. This area is a prime destination for commuters, tourists, joggers, cyclists, hikers, boaters, fishermen, naturalists, historians and others. This land should be in the public domain for the enjoyment of all.
* The District of Columbia is home to a scant 3 miles of the C&O Canal Historical Park. The District should demonstrate its responsible guardianship of this treasure and protect it from development for private use.
* The zoning and development of a private boathouse on this section of parkland would create "closed space". A structure the size of the proposed boathouse and dock would 1) block views of the Potomac from both the Towpath and the Capital Crescent Trail; 2) change the views from the National Heritage Trail in Virginia; 3) create obstacles for the numerous shoreline paddles that frequent that area; 4) add congestion to an already busy recreational corridor; 5) disrupt bike commuter lanes; 6) add the current "open space" to the "concrete jungle" of the District; and 7) add a marina, housing all of the necessary motorized support boats for a rowing program the anticipated size of Georgetown University, to this part of the river.
* A large (84 inch diameter) corroding sewer line runs underground on this site. This aging sewage line carries waste from Virginia, Maryland, and the District. Today, even without this development, this sewage line overflows during strong storms. Additional development will only make a bad situation worse.
* The bank of the nearby historic Canal is fragile and leaking. The effects of a construction project of this size is sure to have an adverse, if not disastrous, effect on its condition.
* Safety concerns related to building, servicing, maintaining, and using a structure of this size at this location are unknown and unnecessary. The size of the building in conjunction with the limited size of the lot bodes ill for collisions between motorized vehicles (boat trailers, trash trucks, etc.) and the numerous users of the Crescent Trail.
* No traffic study has been done or reviewed by the public for this project.
* Development of this Tract is not consistent with the 1987 National Park Service approved document that states:
"Above Key Bridge, west of the boundary of the designated boathouse area, the natural conditions of the palisades will be preserved. The Potomac River above Key Bridge is one of the main scenic treasures of the Nation's Capital, and no new development will be permitted in this area. . . ."
I hope you will vote "NO" to the zoning of this public parkland for private development.

Sincerely,

Amy Potter

2915 N. Franklin Rd.
Arlington, VA. 22201

Young, Deborah B.

From: NCPC Public Affairs
Sent: Thursday, October 30, 2003 5:48 PM
To: Altman, Hillary L.; Zaidain, David
Cc: Brown, Priscilla A.; MacSpadden, Lisa M.; Young, Deborah B.
Subject: FW: NCPC ZC 02-30 Amendment

-----Original Message-----
From: Marcus Lundmark [mailto:lundmark@erols.com]
Sent: Thursday, October 30, 2003 1:39 PM
To: info@ncpc.gov
Subject: NCPC ZC 02-30 Amendment

Reference: ZC 02-30 Amendment to the Zoning Map of the District of Columbia to zone an unzoned vacant parcel fronting on the Potomac River consisting of Tract 102-114, approximately 1/4 mile west of the Key Bridge, to W-O Open Space for the Georgetown University Boathouse.

Dear Commissioners:

This letter is to express my strong opposition to the above-mentioned proposal, for the following reasons:

- Tract 102-114, at the "Gateway" to the C&O Canal National Historical Park, is valued by hikers, bikers, boaters, fishermen, naturalists, commuters, neighbors, tourists, historians -- and others -- and should remain in the public domain.
- Only three miles of the C&O Canal National Historical Park are in the District of Columbia, and every square inch is worth protecting from development for private use.
- There are better alternative locations for the development of private boathouses -- on degraded land outside the Park, begging for redevelopment.
- -Instead of creating "Open Space," the zoning and development of this section of parkland as a private boathouse would actually create "Closed Space." The huge boathouse and dock proposed for this site would: block the views of the River and shoreline from the Towpath and Capital Crescent Trail; modify the view of the natural shoreline from the National Heritage Trail in Virginia (as well as from the Key Bridge); hinder the route of shoreline paddlers; add to the traffic along an already busy recreational corridor; and change open space into a cement jungle.
- The River shoreline along this Tract is tidal and subject to flooding, and an 84-inch corroding sewer line runs underground, carrying sewage from Virginia, Maryland and the District of Columbia -- factors that are unfavorable to construction projects.
- The historic Canal bank nearby is fragile and leaking. Any attempt to widen the right-of-way behind the Washington Canoe Club will drastically weaken the wall of the canal and may lead to a massive flood and destruction of property.
- Safety considerations related to building, servicing, maintaining and using any type of structure on this narrow section of land -- squeezed between the River and the Capital Crescent Trail -- are unknown and unnecessary.
- Traffic and parking needs during and after construction are unpredictable, and no traffic study has been produced -- or reviewed by the public.
- Development of this Tract is inconsistent with the 1987- National Park Service approved document, "The Georgetown Waterfront Park and the C&O Canal," which states: "Above Key Bridge, west of the boundary of the designated boathouse area, the natural conditions of the palisades will be preserved. The Potomac

> River above Key Bridge is one of the main scenic treasures of the Nation's Capital, and no new development will be permitted in this area. . . .

For these reasons, and others, I urge you to vote "NO" to zoning this public urban parkland for private development.

Sincerely,

Marcus Lundmark
9323 Craig Ave
Alexandria, VA 22309

NATIONAL PARKS CONSERVATION ASSOCIATION

Protecting Parks for Future Generations

National Capital Planning Commission
Washington, DC

via email: info@ncpc.gov

Dear Members of the Commission:

Re: ZC 02-30 Amendment to the Zoning Map of the D.C. to zone a portion of the C&O Canal National Historical Park, an undeveloped Potomac riverfront parcel, Tract 102-114 approximately 1/4 mile west of the Key Bridge, to W-O Open Space for private use by Georgetown University.

Thank you for the opportunity to provide comments on this proposal. The following are submitted on behalf of the more than 300,000 members of the National Parks Conservation Association (NPCA). Founded in 1919, NPCA is America's only national private, nonprofit advocacy organization dedicated solely to protecting, preserving, and enhancing the National Park System.

NPCA strongly opposes this proposal, and urges you to vote no, for the following reasons:

1. There is simply no compelling reason to develop this parkland for private use. This land at the "Gateway" to the C&O Canal National Historical Park is heavily used and highly valued by multiple interests including hikers, bikers, boaters, fishermen, naturalists, commuters, neighbors, tourists, and historians, and should remain parkland.

2. There are better alternative locations for the development of private boathouses -- on degraded land outside the Park, begging for redevelopment.

3. Instead of creating "open space," the zoning and development of this section of parkland as a private boathouse would actually close the space to public use. The huge boathouse and dock proposed for this site would: block the views of the River and shoreline from the Towpath and Capital Crescent Trail; modify the view of the natural shoreline from the Potomac National Heritage Trail in Virginia and from the Key Bridge; hinder the route of shoreline paddlers; add to the traffic along an already busy recreational corridor; and change existing open space into pavement.

4. The River shoreline along this tract is tidal and subject to flooding, with an 84-inch corroding sewer line runs underground, carrying sewage from Virginia, Maryland and the District of Columbia -- factors that are unfavorable to construction projects.

5. Development of this Tract is inconsistent with the 1987- National Park Service approved document, "The Georgetown Waterfront Park and the C&O Canal," which states: "Above Key Bridge, west of the boundary of the designated boathouse area, the natural conditions of the

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palisades will be preserved. The Potomac River above Key Bridge is one of the main scenic treasures of the Nation's Capital, and no new development will be permitted in this area. . . .

6. We are unaware of any analysis of possible safety considerations related to building, servicing, maintaining and using any type of structure on this narrow section of land – shoehorned between the River and the Capital Crescent Trail.

7. No traffic study has been produced to address resolving traffic and parking needs during and after construction.

For these reasons we urge you to vote "no" to zoning this public urban parkland for private development.

Sincerely,

(signed)

Joy M. Oakes, Director
Mid-Atlantic Program
National Parks Conservation Association
1300 19th Street NW, Suite 300
Washington, DC 20036
joakes@npca.org
202-454-3386