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May 1, 2003

DC Zoning Commission
Attn: Carol Mitten, Chair
441 4th St. NW, Suite 210
Washington DC 20001

Re: Case 02-30 and 02-31

ZONING COMMISSION
District of Columbia
Case 02-31
Exhibit 76

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The Washington DC Chapter of Sierra Club, representing over thirty-two hundred members, is opposed to the proposed building of a large boathouse on Tract 102-114 for private use. Back in 1998 NPS agreed to swap this public land to Georgetown University in exchange for a piece of land (Tract 102-109) further upstream owned by the University. This agreement has no provisions to protect the hydrologic, soil retention, wildlife habitat or public recreational functions of the land on which this giant boathouse is to be constructed. The agreement was also based on inaccurate information, specifically that GU's original tract (102-109) could be developed as a boathouse, that the boathouse would be of modest dimension and that it would provide for public access. None of these are true. The eight-year-old environmental assessment that was performed based on this erroneous information is invalidated by the current plans of the University.

The exchange is contingent upon the University obtaining zoning that permits the boathouse construction. GU has petitioned the DC Zoning Commission in cases 02-30 and 02-31 to zone the parkland so that they may close the exchange and start building. These cases are due to be heard by the Zoning Commission on 19 May. This hearing is likely to be the last and best chance for the public interest to be served by blocking this diversion of public land in the C&O Canal National Historic Park to developed private use. The Commission is strongly urged to deny the petition by tax exempt Georgetown University and serve the taxpaying public by preserving the Potomac riverfront from Key Bridge west to the District line for no new development.

Completion of this proposed exchange and construction provides numerous disadvantages to the public. First, Tract 102-109, which the University owns now, is so situated within the confines of the C&O Canal National Historic Park that it could not ever be developed. Therefore, by agreeing to the swap and building of the boathouse NPS is reducing the amount of wild parkland available to the public. Second, the boathouse will supplant wetlands that protect the river and will destroy habitat for numerous species. Third, it will be in a flood plain, with danger of chemical pollution of the river from drainage and periodic flooding of the rowing tank and air conditioning chemicals in the boathouse. Fourth, the boathouse (over 50 ft.

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tall) will block the view from the trail and the C&O Canal. Fifth, the traffic from the boathouse (boat trailers, maintenance, passenger drop-off, etc. will have to share the already constricted space with the many public users of the Capital Crescent Trail, and there is no provision for the parking of these vehicles. Sixth, the removal of trees and "flow through" design of the boathouse removes nature's protection from flood-borne debris to all downstream edifices. Finally, the 85 ft. protruding dock will constrict traffic on the river for all other users.

This is another swap of public parkland by NPS to benefit a powerful private entity at the expense of the public interest. It is the second such bite out of the beloved parkland in Northwest DC this year, the very parkland that gives unique character to our city and neighborhoods. The D.C. Chapter of Sierra Club strongly supports conservation of our limited wild urban resources. Ample space for boathouses exists to the east of Key Bridge, and indeed NPS is reported to already have plans to place two boathouses there. The Chapter encourages Georgetown University to build a boathouse in the space east of Key Bridge that is more in character with the environs. St. Joseph's University, which has a rowing program at least equal to that at Georgetown University, has just completed a boathouse that is more modest in size and that also will accommodate public teams for rowing. For comparison, the proposed GU boathouse is three times the size of the Washington Canoe Club boathouse, which has been serving that Club since long before there was a National Park on the river.

The Zoning Commission has this opportunity to stop the consumption of public parkland by private development interests. Redevelopment of the ample supply of already developed space, and preservation of public green space is an absolute key to ecologically sound and socially equitable economic development in the District of Columbia. The C&O Canal National Historic Park is a public treasure, long championed by such icons as the late Justice of the Supreme Court William O. Douglas. Please serve the taxpaying public by denying the request to zone our parkland for public development in Cases 02-30 and 02-31.

Mark Wenzler
Chapter Chair, DC Chapter
Sierra Club

Bob Morris
Conservation Chair, DC Chapter
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