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May 9, 2003

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

Re: Zoning Commission Cases 02-30 and 02-31 (Georgetown University Boathouse)

Dear Ms. Mitten and Members of the Commission:

The Applicant in this case herewith transmits the three attached letters for inclusion in the record of the above-referenced cases and for the Zoning Commission's consideration. The first letter is from the National Park Service (NPS) to the Washington Canoe Club (WCC). The letter is in response to concerns expressed by WCC to NPS. A number of Canoe Club members and some others have submitted letters in opposition to the above-referenced cases. The letter responds in some detail to the principal concerns expressed in the letters. The Applicant will address these concerns in greater detail in its presentation at the public hearing on May 19, 2003.

The second letter is from the U.S. Army Corps of Engineers to the National Park Service, indicating that there are no jurisdictional wetlands on the Georgetown University Boathouse site. The third letter is from the Superintendent of the C & O Canal National Historic Park to Georgetown University, commenting on the preliminary design and setting forth four goals for design work related to the boathouse site.

We hope these letters will help address issues that have been raised in this case.

Sincerely,
ARNOLD & PORTER

Cynthia A. Giordano

Nathan W. Gross, AICP

ZONING COMMISSION
District of Columbia
Case 02-31
Exhibit 90

ZONING COMMISSION
District of Columbia
CASE NO.02-31
EXHIBIT NO.90

United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO

L14 (NCR-LRP)

MAY 7 2003

Mr. Lawrence C. Schuette
President, Washington Canoe Club
P.O. Box 25449
Washington, D.C. 20375

Re: Georgetown University Boathouse

Dear Mr. Schuette: LARRY

I apologize for the long delay in responding to your letter dated January 1, 2003. The National Park Service (NPS) would like to express our appreciation to you and your membership for meeting with us and Georgetown University to review the plans for their proposed boathouse on December 11, 2002.

We realized before the meeting that your membership might have questions about the project and it was our hope that we would have been able to answer as many of those questions as possible through such a meeting. From your letter, you have also either asked for further clarification or raised a number of issues which we will respond to under the same headings within which you raised them.

As you know Georgetown University owns land up river west of the Washington Canoe Club (WCC) which is the subject property for the exchange with the Park Service for the site adjacent to you. We deem the up river site more desirable for addition to our parkland holdings and not for development as a boathouse site. The University also holds a number of easements appurtenant to that site which we believe would be much more disruptive to the waterfront and to the Capital Crescent Trail than the site adjacent to the WCC.

"Concerns regarding the effect of new construction to our Historic Building"

You have raised a number of concerns related to site excavation, building foundations, construction vehicles, service roads, etc. and their potential affect on the WCC.

Unlike the Ritz Carlton project, which you may be familiar with, that has recently been completed along K/Water Street, the Georgetown Boathouse will not require deep excavation since the majority of the foundation system is slab on grade. The only portion of the project that

will require shallow excavation is the rowing tank. The University does not anticipate blasting of any rock for the construction of this project.

Not only is the University's contractor and design team cognizant of the close proximity of the WCC, but also of the 84" sanitary sewer line which runs directly through the GU construction site. The construction team is reviewing methods and procedures for either piles or caissons, which are typical of deep foundations for ocean and river side sites, to select the system that will cause the least disruption to the existing structures in the area. Currently, the design recommendation is for drilling pipe piles down approximately 32 feet to disintegrated rock.

The University's team will construct a temporary roadway specifically designed to carry the weight of construction vehicles. This will likely be a gravel roadway, allowing vehicles to enter the area at slow speeds with the assistance of flag-men. In addition to protecting the structure of the WCC, the safety of the users of the Capital Crescent Trail must be taken into consideration at all times. Excess vibration will be minimized and pedestrian safety will be maximized by a well maintained traffic lane with vehicles moving at very slow speeds.

Whiting-Turner, the University's construction manager, has done many projects in close proximity to historic structures both on Georgetown University's Campus and in the Georgetown community with great success. Muse Architects and the Whiting-Turner construction team that is involved with the Georgetown Boathouse project completed a project with similar conditions at the Lab School of Washington several years ago. Construction surrounded the historic Castle Building, and similar augering of piers and much more extensive excavation work were components of that project. Additionally, the school continued to operate year round as construction occurred throughout the campus. Great care was taken to protect the surroundings and the people, and the project was successfully completed.

On previous historic (and non-historic) projects where construction has occurred within close proximity to a sensitive structure, Whiting-Turner has hired an independent inspector to do a thorough pre-construction survey to document the existing conditions and regularly monitor and re-inspect the structure throughout the course of construction to ensure that no damage is done to the facility. Whiting-Turner is prepared to do the same with the WCC for the Boathouse project if you concur.

"Concerns to on-the-water changes to the WCC Facility"

With regard to the on the water impact of the Georgetown boathouse I would ask that you work with Tony Johnson, head coach at Georgetown, and the Potomac River Safety Committee to see if and how these issues can be resolved. Those of us that are not experts in these issues, nor on the water as those of you that are involved in the canoeing and rowing are, need to rely on those of you who are experts in this area.

I have been told, however, that it is approximately 100 meters from the WCC docks to the nearest edge of the rowing lane between Key Bridge and the Three Sisters, which is a greater distance than between the Three Sisters and the District of Columbia shore. That seems like a sufficient area for training for the canoes, as well as a racecourse.

It has been suggested to me that a buoy line be placed in the river in an area where there is potential congestion to mark the edge of the lanes used normally by rowing shells, or the edge of the area used primarily for canoeing. I urge you to discuss this with Tony.

"Regarding environmental concerns to the WCC building and the Potomac River"

To date, the project has undergone extensive review by the District of Columbia Environmental Regulatory Agency. The requirements by that office include soil erosion control measures during construction and a storm water management structure, including a sand filter to slow and control impervious area runoff. The project has also been reviewed by the U.S. Army Corps of Engineers which has determined that there are no jurisdictional wetlands on the site or habitats that will be disturbed by the introduction of the building to this site. "The wetlands that are on the National Park Service tract are not of the kind that are considered to be beneficial to the preservation or improvement of the water quality of the Potomac River or the Chesapeake Bay." This assessment was written in a letter to NPS dated October 16, 1995, from George Harrison of the Potomac River Basin Permit Section of the Army Corps.

The Army Corps has also reviewed and provided design guidelines with the stone rip rap shore stabilization that is proposed for the entire shore line along the property, as well as the dock design. The project will fully comply with these guidelines.

In addition, 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 Park Service.

"Regarding the size and visual impact of the GU Boathouse"

The designers conceived of the buildings 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 WCC.

"Concerns regarding the loss of land to the WCC"

As you know, the WCC leases its land from the NPS and will continue to do so for the foreseeable future. We have no desire to take away or diminish in any way WCC's use of the current site. That is why as part of our discussions we have offered to extend your land assignment on the east of your boathouse in an effort to shift uses to the west. The University, as part of its plan, has agreed to landscape and maintain the property between the two boathouses in such a way that it would not preclude WCC from enjoying the use of that property. In addition, the University will not be utilizing any portion of the land that they will own for parking purposes. The NPS wishes to remove all parking from waterfront sites and considers it to be inappropriate for land uses that should be contributing to the natural vista of the Potomac River. In fact we are planning for the eventuality of no parking on sites west of the Aqueduct Bridge. Like the facility at Thompson's Boat Center a short-term public parking area is proposed in the right-of-way of Water Street from 34th Street to the aqueduct to accommodate your needs as well as other recreational users. Of course, access for emergency vehicles, deliveries and those that are disabled would be allowed to the WCC.

"Flood Effects to the WCC Building"

As stated above, the Georgetown Boathouse has been reviewed by FEMA and the University has not received any comments that indicate any concerns with respect to neighboring structures, flood currents, or hydrodynamic issues.

"Post Construction Concerns"

The permanent service road that is being proposed is currently designed to be macadam. It would be detailed and constructed as any other road system would be, and as such, should not have any adverse affect on the WCC.

The use of the boathouse shall be as a training facility for Georgetown University's men's and women's 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.

The dimension that the boat ramp and dock will extend into the river depicted on the drawings is approximately 70 feet rather than the 100 feet that your letter references. 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.

In summary, we believe that this proposed boathouse will not cause or contribute to many of the issues originally outlined in your correspondence to me. We feel that the Georgetown University Boathouse will be an added value to the Potomac waterfront and will be an appropriate neighbor to the WCC for many years to come. We hope that we have addressed your concerns and look forward to your support as we move forward with this important project. I would be pleased to schedule a meeting with you and/or club members to further discuss the proposal.

Sincerely,

John G. Parsons
Associate Regional Director
Lands, Resources and Planning

cc:
Alan Brangman
Georgetown University

bcc:
NCR-Surname/File
C&O Canal – Supt. Faris
C&O Canal – K Brandt
NCR-LRP-Parsons
NCR-LRP-File
JGParsons:gdp:619-7025:May 7, 2003:WCC Response Letter v4.doc

DEPARTMENT OF THE ARMY
BALTIMORE DISTRICT, U.S. ARMY CORPS OF ENGINEERS
P.O. BOX 1715
BALTIMORE, MD 21203-1715

REPLY TO
ATTENTION OF

OCT 16 1995

Operations Division

Subject: CENAB(NATIONAL PARK SERVICE/D.C./JD)1995-00036-3

NATIONAL PARK SERVICE
Attn: Glenn M. DeMarr
1100 Ohio Drive, S.W.
Washington, D.C. 20242

Dear Mr. DeMarr:

This is in response to your request of 22 September 1995 for a jurisdictional determination of waters of the United States, including jurisdictional wetlands, on property adjacent to the Washington Canoe Club at 3700 K Street, N.W., on the Potomac River, Washington, D.C..

I have reviewed the information you provided and other available pertinent information concerning the site in question. A field inspection was made on 13 October 1995. 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.

This jurisdictional determination superceeds the one for the same parcel for Georgetown University boathouse, dated 11 Ferruary 1993 (CENAB-OP-RP-1993-00376-3). If you have any questions concerning this matter, please call me at (410)962-6002.

Sincerely,

George Harrison
Ecologist
Potomac River Basin Permit Section

APR-21-2003 13:02 GU PM DEPARTMENT 2026876879 P.02/04

United States Department of the Interior

NATIONAL PARK SERVICE
C&O Canal National Historical Park
1850 Dual Highway, Suite 100
Hagerstown, Maryland 21740

IN REPLY REFER TO:
D18 (CHOH)

November 4, 2002

Mr. Chris Jordan
3700 O Street, NW
Basement, New South Building
Washington, D.C. 20057

Dear Mr. Jordan:

We have completed our review of your preliminary design for accommodation of the Georgetown University Boathouse along the Capital Crescent Trail. We understand the need to develop a 30-foot emergency access right-of-way and have four general goals for your design work:

- Maintain and enhance access to the Capital Crescent Trail
- Maintain, to the greatest extent possible, horizontal and vertical alignment of the Trail
- Enhance visitor safety and experience through articulation of vehicular and pedestrian circulation
- Create a sense of entry to the Capital Crescent Trail

More specifically, the National Park Service believes that two asphalt access drives, separated by a visual and slight textural buffer with sufficient stabilized turf shoulder on the boathouse side to achieve the 30-foot right-of-way, best serves park visitors and boathouse users. Alignment transitions should be more shallow/gentle than those shown. The interface with the Washington Canoe Club entrance drive, the end of K Street, and incorporation of pedestrian circulation down the stairs and from under the aqueduct should be articulated even if it is not fully constructed now. In addition, the design should show how the area can become an entry point to the Capital Crescent Trail and create a sense of arrival. This would involve the design of a small paved area to one side of the trail to include an emergency call box, water fountain, a large trail identification sign, as well as two vertical wayside panels with a locator map and area interpretive and trail etiquette information.

We are trying to locate the environmental and cultural resource compliance that was apparently done some years ago. If we can relocate that documentation and it is applicable to your current proposal and contemporary standards, we will not have to repeat those steps.

We believe it is essential that informational meetings be held with the Washington Canoe Club and the Coalition for the Capital Crescent Trail. We are pleased to provide you with these comments and are willing to meet with you directly to discuss them in more detail or assist your design team. Please contact Assistant Superintendent Kevin Brandt at (301) 714-2202 to continue your project coordination.

Sincerely,

Douglas D. Faris
Superintendent

cc:
Sally Blumenthal – NCR LRP
Lynne Wigfield – CHOH Compliance

KDBrandt:glk:F:\Users\Files\comments on G-town Boathouse 11-4-02