

# STAFF RECOMMENDATION

NCPC File No. 6383



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**GEORGETOWN WATERFRONT PARK**  
WISCONSIN AVENUE TERMINUS,  
Wisconsin Avenue to 31<sup>st</sup> Street, NW,  
Washington, D.C.

Submitted by the National Park Service

January 25, 2007

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## Abstract

The National Park Service (NPS) has submitted revised preliminary site development plans for the Wisconsin Avenue Terminus portion of the Georgetown Waterfront Park that were approved in June 2005. Material revisions and refinement of the proposal has occurred since 2005 but the focus area maintains all features approved by the Commission in its earlier review.

## Commission Action Requested by Applicant

Approval of the revised preliminary site and building plans pursuant to 40 U.S.C. § 8722 (b)(1) and (d)

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## Executive Director's Recommendation

The Commission:

**Approves** the revised preliminary site and building plans for the Georgetown Waterfront Park, Wisconsin Avenue Terminus, as shown on the NCPC Map File No. 72.00(38.00)-42167.

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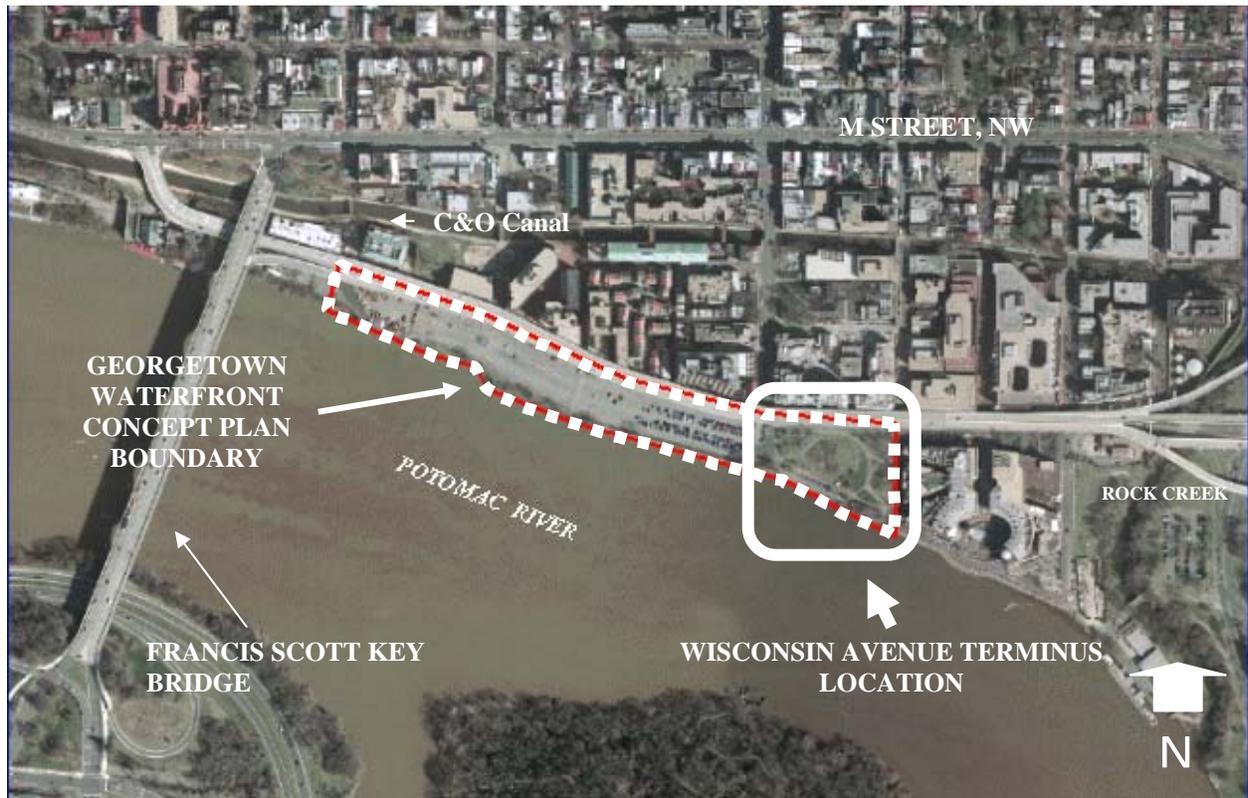
## PROJECT SUMMARY

### Site Description

The National Park Service's revised preliminary submission involves a limited portion of the waterfront in the vicinity of the Wisconsin Avenue entry terminus. This area of the park contains approximately 2.3 acres and is the main entry section of the recreational area. The design takes in an area that extends back from the shoreline approximately 185 feet to K Street, NW, and reaches under the Whitehurst elevated roadway. The Whitehurst Expressway, above K Street, defines the length of the northern edge of the site and creates a visual barrier between Georgetown and the planned park. However, the Wisconsin Avenue view-corridor leads directly into the park and is oriented north/south under the elevated road. The preservation of the vista from Wisconsin Avenue to the Potomac River and a pedestrian connection along the river's edge at this area of the park, which links to the shoreline from Rock Creek, are major attributes established by the preliminary design.



**VICINITY LOCATION OF GEORGETOWN WATERFRONT PARK**



### **BOUNDARY OF OVERALL GEORGETOWN WATERFRONT PARK CONCEPT**

#### Background

The Commission last reviewed aspects of the Georgetown Waterfront Park, Wisconsin Avenue Terminus, in July 2005. At that time the Commission approved the preliminary site development for Georgetown Waterfront Park at the Wisconsin Avenue Terminus, as illustrated and described in that submitted information, except for:

- The proposed design of the pergola structure and its attendant seating, which is deferred until more detailed information is provided by the National Park Service on the structure's material composition, exact structuring layout, and complete description and detail of the overarching roof material.
- The pedestrian sidewalk north extension at Wisconsin Avenue, which should be either further revised as a receptive and refined entry point, or eliminated from the park sidewalk design entirely.
- Use of the multiple-lamp Washington Globe at the Wisconsin Avenue park entrance.

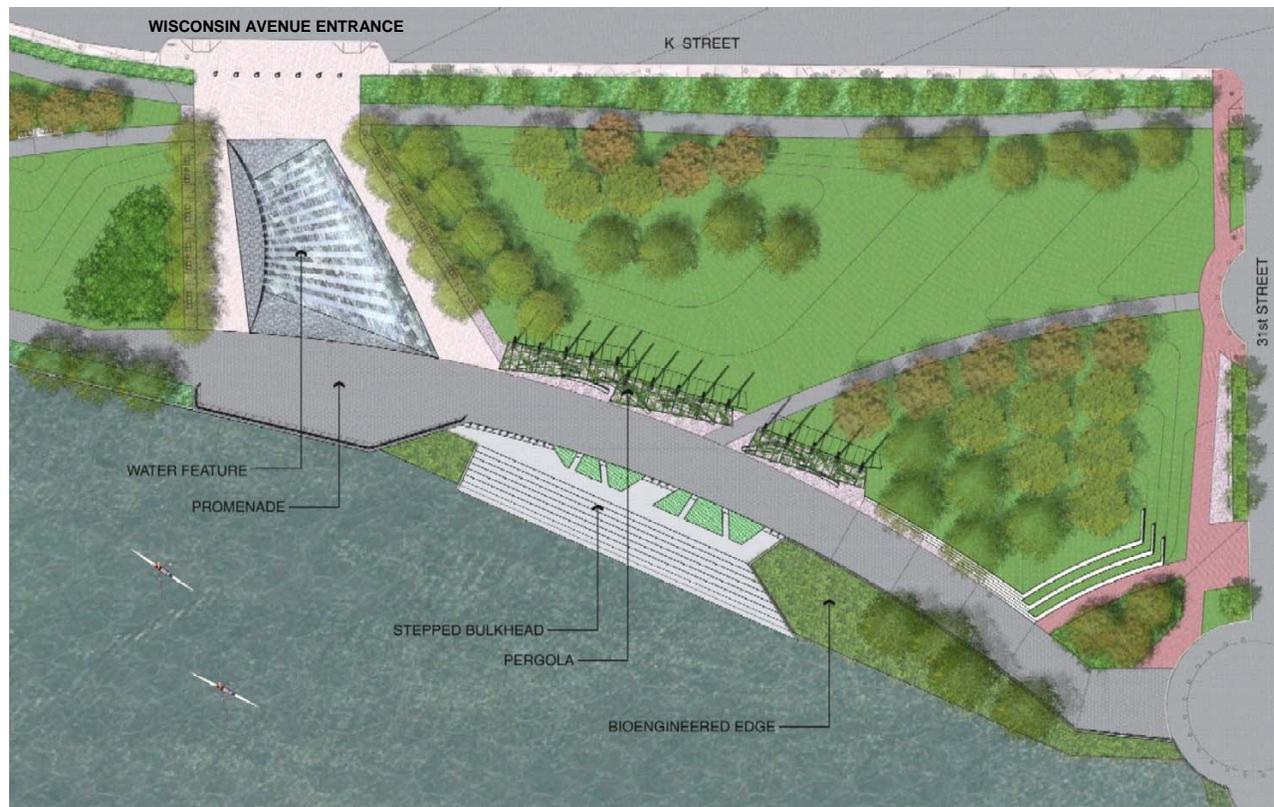
The applicant has responded to these issues through revision of the preliminary plans as described in the proposal below.

## Proposal

The currently submitted Wisconsin Terminus revised preliminary site development plans include the following activity areas:

- A promenade at the river's edge.
- Alignment of a regional trail component (Crescent Bike Trail) at the section's north edge.
- Open lawn areas for passive recreation.
- A shelter/pavilion (pergola) for shade, sitting and viewing.
- A primary plaza space at the foot of Wisconsin Avenue as the major gathering space of the park.
- An interactive water feature with no standing water pool.
- Opportunities to be in proximity to the water.

The revised preliminary plans continue to build upon the concept design provided to the Commission. The pergola at the Wisconsin Avenue central plaza area has been refined in its geometry and height. The primary materials of the pergola now involve steel structural members colored dark olive, which cant backward at an angle and have a suspended arm extending forward from the vertical forms that create the roof support of the pergola. An open metal screen

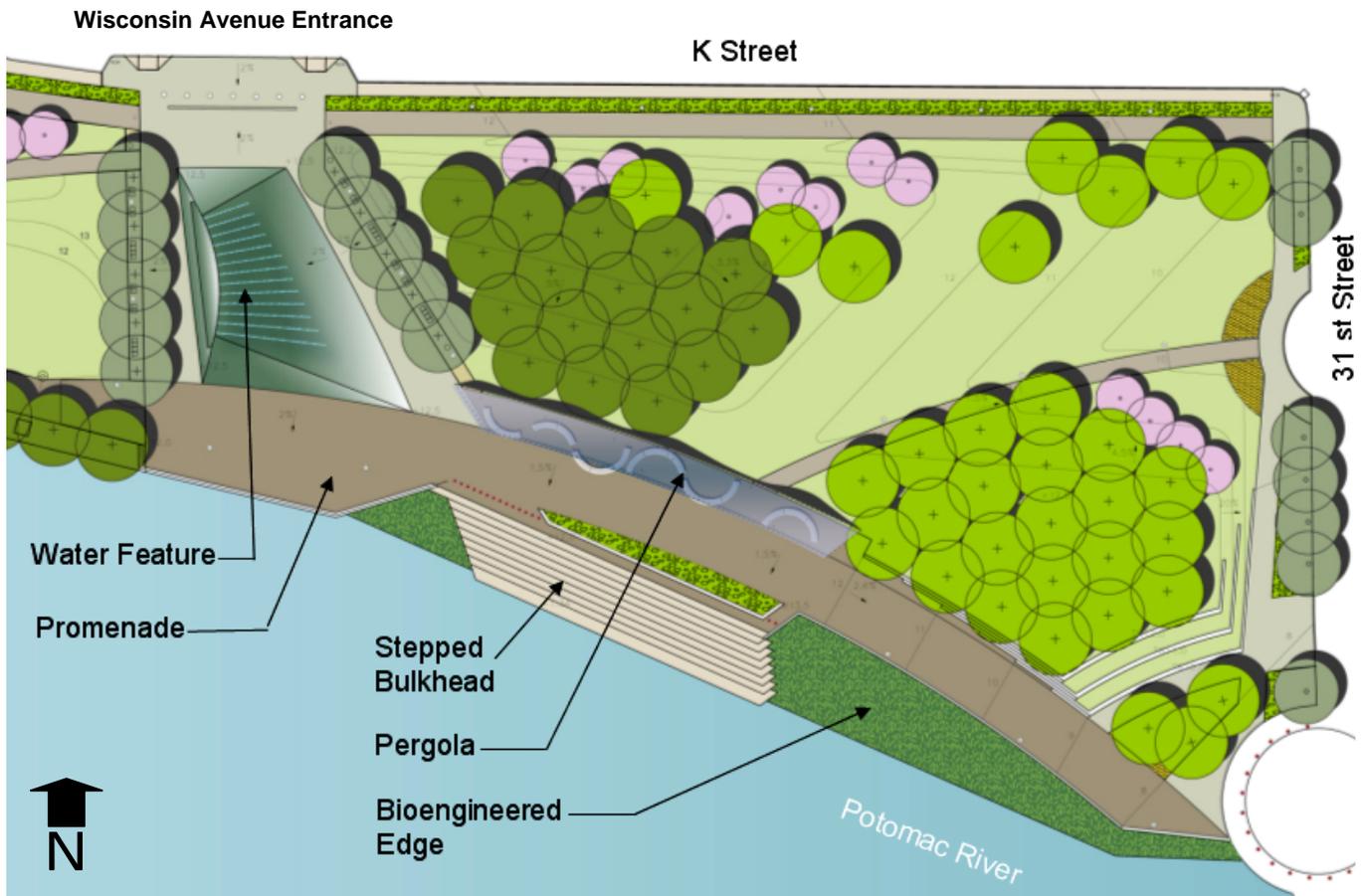


**REVISED PRELIMINARY SITE PLAN FOR WISCONSIN AVENUE TERMINUS**

comprises the up-angle roof profile and serves to support vegetation growth the will create the shading green roof. A series of undulations along the leading edge of the pergola further augments a sense of motion to the pergola, adding a changing pattern of shade below. The seating elements are envisioned as granite, arranged in curving shapes to provide a variety of viewing orientations. The granite used for the seating will match the granite used at the fountain and overlooks, thus establishing a consistent theme for all of the park's iconic features.

The park pedestrian pavement remains as original design with areas of granite pavers as a consistent treatment of the ground plane within areas adjacent to tree-shaded seating areas. Also, the design continues the previously reviewed fountain area that has established a conventional fountain arrangement utilizing a large low-height seating area, with readily controlled low-angle jet streams. All water streams are located within an internal draining water basin.

The fountain jets are generated from a water pool located within the bench base area that is slightly submerged within the granite base and splashes onto the plaza that is defined by the use of an alternate paving pattern. The design provides a normal approach to seating around the fountain by using a large granite bench which serves the purpose of also enclosing a portion of the mechanical elements of the fountain itself. The slight depression (basin) in the paving collects the water. Pedestrians can either walk through the fountain, or around it, toward the stepped bulkhead and the shoreline promenade.



**JULY 2005 PRELIMINARY SITE PLAN FOR WISCONSIN AVENUE TERMINUS**

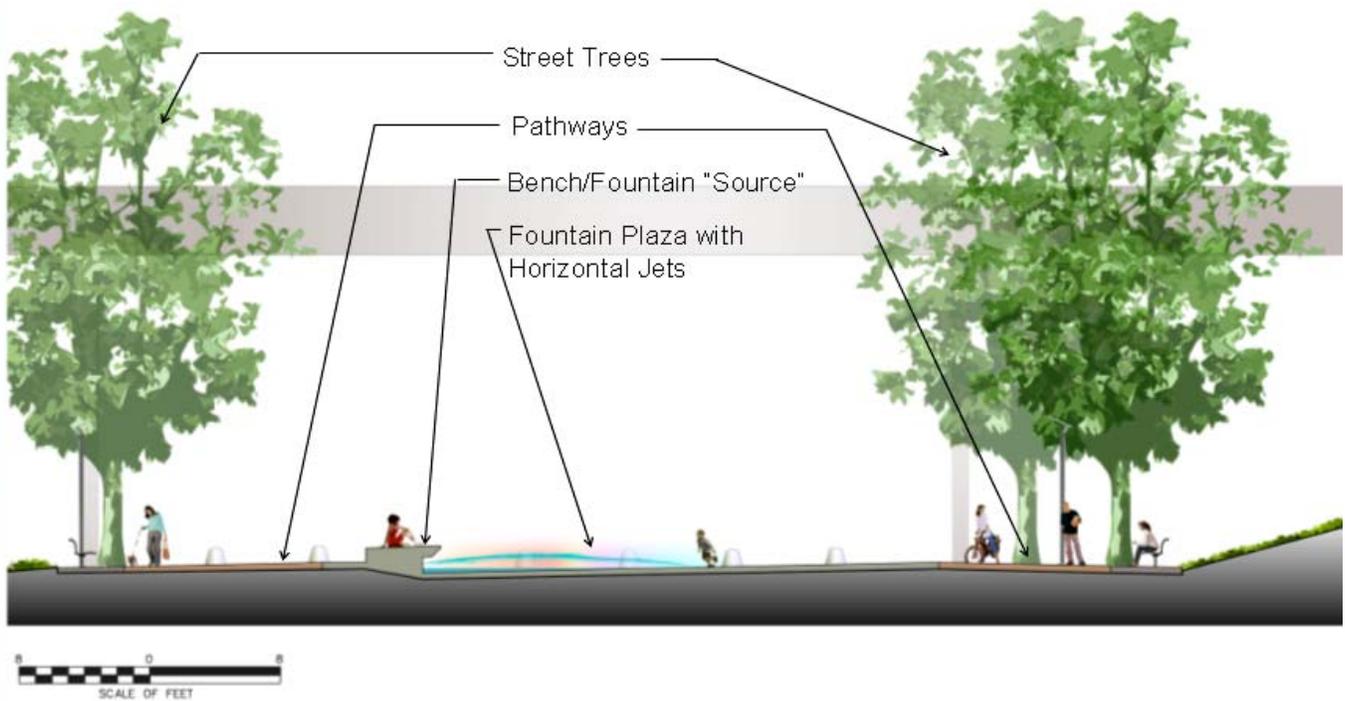
Park perimeter lighting has now been altered to feature only the single-lamp Washington Globe light standard along K Street and 31<sup>st</sup> Street.



### **REVISED PRELIMINARY DESIGN OF WISCONSIN AVENUE TERMINUS WITH FOUNTAIN AREA AND SEATING AREAS**

Other elements of the revised preliminary plan include:

- A vegetated soil bioengineering system in the design plan at the shoreline.
- Modification of the river stairs (stepped bulkhead) for containment of planting at the bulkhead edge and a clear travel direction defined by its endwall alignments.
- Design of the promenade that continues to pass through the plaza between the fountain and the river shore.
- Configuration of the plaza at the river's edge that permits pedestrians to view the river directly from a railing. All walking surfaces are completely accessible.
- Promenade bollards to make the pedestrian area handicapped accessible while precluding wheelchairs from accidentally going over the bulkhead edges.
- Elevated grass panels at the north edge of the stepped bulkhead.



**SECTION OF THE GEORGETOWN PARK WISCONSIN AVENUE TERMINUS  
CENTRAL PLAZA AND FOUNTAIN**

The landscape plant materials for the park area have been further developed to transition various species and plant forms into the whole composition of the central green space. Trees are grouped into groves of high-canopy trees with grass beneath them. A larger informal lawn area is established in the revised plan. The revised plan introduces a wider north landscape buffer of small trees and shrubs between the Crescent bike trail and K Street, thus incorporating the trail to the interior side of the park perimeter.

Development Program

Applicant: The National Park Service

Architect: Wallace, Roberts and Todd, LLC, landscape architects  
Parson, Brinckerhoff, Quade, and Douglas, site engineering  
With support of Robbin B. Sotir & Assoc., Delon Hampton & Assoc.,  
Grenald Waldron Assoc. and Oehrlein Assoc.

Square Footage: 2.3± Acres

Estimated Cost: Approximately \$16 million, based on estimated current scope for full 10 acre park development.



## **REVISED PERGOLA PRELIMINARY DESIGN WITH SEATING AREAS BENEATH**

### PROJECT ANALYSIS

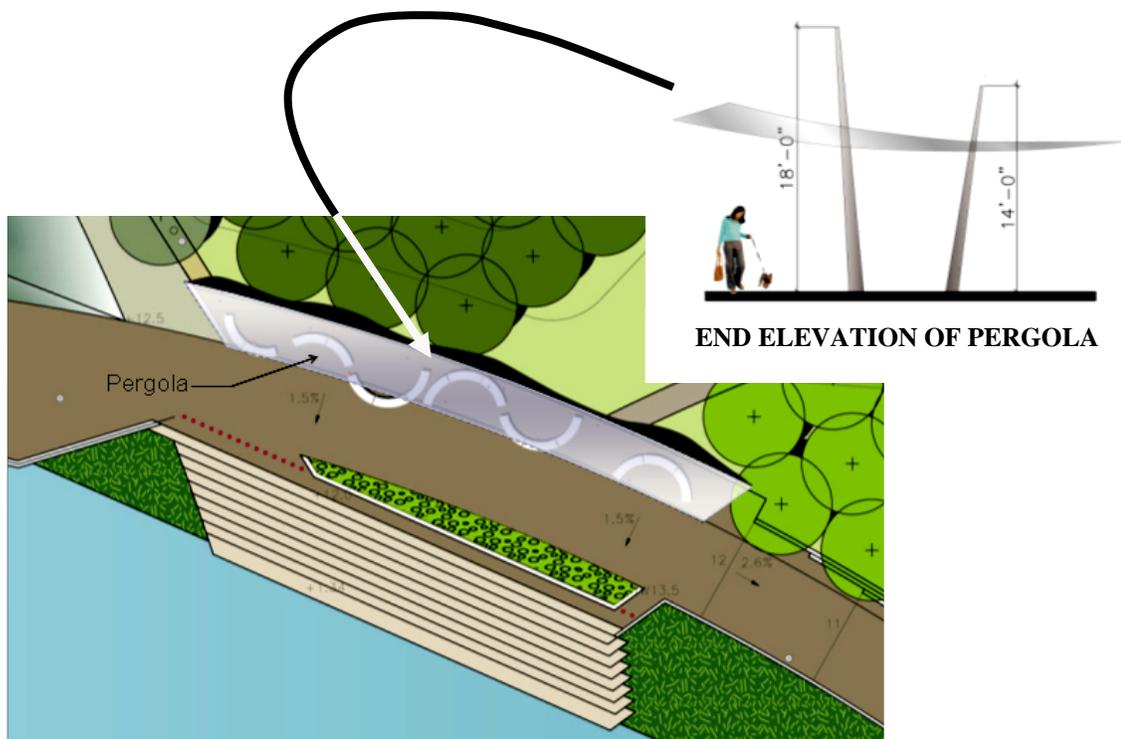
#### Executive Summary

Staff **recommends approval of the revised preliminary plans** for the Wisconsin Avenue Terminus including the proposed design of the pergola structure and its attendant seating.

The revised preliminary design responds to the Commission's direction to the Park Service regarding defining the materials of the Pergola. The revisions to landscape features respond to local community meeting concerns that are now integrated into the plans regarding more informal lawn areas and fewer trees placed into those sections. The preliminary design revisions

also maintain the Crescent Trail alignment through the park near K Street, affording the connection and access to the wider regional trail network. And finally, the revised preliminary design creates a slightly larger north extension of the sidewalk at Wisconsin Avenue, thus responding with a revision making the pedestrian crossing point more prominent.

Staff finds the revised design continues the focus towards the aspects of the Commission to provide contrast, view arrangement, and openness in the terminus area which was sought by the Commission's earlier reviews in 2003 and 2004.



**PREVIOUS JULY 2005 PERGOLA IN THE PARK**

## PROJECT CONFORMANCE

### Comprehensive Plan

The proposal for the Wisconsin Avenue Terminus section of the Georgetown Waterfront Park is consistent with policies contained in the Comprehensive Plan for the National Capital. The Parks and Open Space Element designates river and waterfront settings of the Nation's Capital. The Comprehensive Plan policies state:

The federal government should:

1. Plan for new parks as part of the park system of the region.
2. Acquire parks and open space as necessary to augment the open space system.
3. Use easements, donations, purchases, exchanges, or other means to acquire land or to enhance parks and open space. Examples of areas or park systems where further acquisition is desirable include:
  - South Capitol Street,
  - Anacostia River waterfront and tributaries,
  - Georgetown Waterfront Park ...

(Expansion and Enhancement Policies p.103)

Furthermore, the Comprehensive Plan notes in its August 2004 update that:

The federal government should:

1. Link open space along the waterfront to provide a continuous public open space system.
4. Complete the waterfront parks in Georgetown and Alexandria.

(Parks and Landscapes Policies; Waterfront Parks p. 111)

Additional Plan objectives noted include:

The federal government should:

1. Enhance parks and preserve open green space for future generations.
2. Maintain and conserve federal open space as a means of shaping and enhancing urban areas.
3. Preserve open space that is crucial to the long-term quality of life of a neighborhood or the region.

(Preservation and Maintenance Policies; p. 104)

Other objectives dealing with rivers and waterways of the plan include:

The federal government should:

4. Protect, restore, and enhance the Anacostia and Potomac Rivers as great open space resources including shorelines and waterfront areas along rivers.
5. Improve the quality of water in the Anacostia and Potomac Rivers to allow for both restored natural habitats and increased recreational use.
6. Retain shoreline areas in their natural condition or appropriately landscape the water's edge.
7. Manage all lands along the Anacostia and Potomac Rivers in a manner that encourages the enjoyment and recreational use of water resources, while protecting the scenic and ecological values of the waterways.
8. Retain both privately and publicly owned land along waterways in a natural state, except in areas that are determined appropriate for development.
9. In urban waterfront areas that are determined appropriate for development:
  - Avoid construction in environmentally sensitive areas.
  - Restore, stabilize, and/or improve and landscape degraded areas of shorelines.
  - Limit development along or near the shoreline and integrate it with the generally low and continuous line of river embankments.

10. Avoid physical barriers to the waterfront, and long, unbroken stretches of buildings or walls along waterfronts.
11. Determine building height along or near the shoreline based on the building's proximity to the shoreline.
12. Design and locate bridges so that they minimally affect local riverine habitat, waterways, shorelines, and valleys.
13. Encourage swimming, boating, and fishing facilities, as well as water-oriented tourist activities, on the Anacostia and Potomac Rivers.

(Rivers and Waterways Policies; p. 121)



### **REVISED PRELIMINARY DESIGN OF STEPPED BULKHEAD**

#### National Historic Preservation Act

The Park Service has completed its Section 106 responsibilities for the revised plan, determining that the implementation of the concept and preliminary design would have no adverse effect on the historic or architectural character of the waterfront area.

The D.C. State Historic Preservation Officer (DC SHPO) determined that the 1986 concept plan for the Georgetown Waterfront Park would have no adverse effect on the National Register qualities of the Georgetown Historic District or the C&O Canal National Historical Park. The project was also reviewed by the D.C. Historic Preservation Review Board at that time. The effect determination was reached with two conditions: that each request for demolition be considered individually, and that the location and design of future boathouses be reviewed. The level of archaeological assessment was commended, as was the “sensitive landscape design, which avoids archaeological resources.”

The current proposal does not extend nor significantly deviate from the area of that reviewed design. Most of the proposed park area can be installed without digging significantly beneath the disturbed top layer. For tree plantings and some other features, archaeological monitoring will take place during construction to ensure that artifacts remain *in situ* and are not disturbed. The landscape design was developed to avoid disturbance.

NPS conferred again with the DC SHPO about the concept plan in the summer 2003. The current plans implement that proposal. The 1986 determination of no adverse effect is still considered valid, given the similarity of the plans, as well as the review protection for any demolitions and the archaeological monitoring.

The Advisory Council on Historic Preservation also commented on the concept plan in 1986, stating that the implementation of the plan would improve the appearance of the waterfront and enhance the public’s enjoyment of the river as a major recreation area.

#### National Environmental Policy Act

Pursuant to the regulations implementing the National Environmental Policy Act (NEPA), the National Park Service and the Commission arrived at a Finding of No Significant Impact (FONSI) through the completion of an Environmental Assessment in June 1984.

Staff reviewed the current revised preliminary design plans and determined the plans are fully consistent with the analysis and conclusions found in the original evaluation. Staff has reviewed the action for extraordinary circumstances as sanctioned by NEPA and determined the FONSI remains valid in accordance with the Commission’s procedures.

#### Federal Capital Improvements Program

In the Commission’s recent FCIP report, fiscal years 2007-2012, the Commission recommended the project for future programming.

A portion of the Georgetown Waterfront Park project is included in the Federal Capital Improvements Program (FCIP) fiscal years 2007 – 2012, adopted by the Commission. The cost associated with the current phases of park implementation under construction (Phase 1 Western Section) is placed at \$7,341,934. The whole of the planned park is estimated in the current FCIP at \$16,538,173. The need for funding of the overall Park has been identified by the Commission since 1981.

The Park Service's overall focus for development costs of the Georgetown Waterfront Park is through public/private funding initiatives as major portions of the park are finalized in design. A part of this funding effort involves The Georgetown Waterfront Park Fund that is managed by the National Park Foundation, a 501(c) (3) organization, chartered by Congress in 1967 as the official non-profit partner of National Parks to encourage the tradition of private philanthropy for our national parks.

## COORDINATION

### Coordinating Committee

The Coordinating Committee at its January 10, 2007 meeting reviewed the proposal and forwarded it to the Commission with the statement that the project has been coordinated with all agencies represented. The participating agencies are: NCPC, the District of Columbia Office of Planning, the National Park Service and the General Services Administration.

### Commission of Fine Arts

The Commission will be reviewing the Wisconsin Avenue Terminus portion of the park at its February 15 meeting.

### Public Comment

Three expressions of communication to the Commission were received on January 19, 2007 and January 25, 2007, about the subject proposal (see attachments). One reference is to earlier comments provided in February 2006, which also is attached. These contacts were provided by e-mail from separate individuals and express concerns that have been previously reviewed by the Commission or staff regarding the presence of the Georgetown University Boathouse in the vicinity, upstream of the Georgetown Waterfront Park. The boathouse involves a land parcel that is to be transferred from the Park Service, which was approved by the Commission on September 7, 1995. The transfer involves the exchange of two sites and is to include a site which is held by the University. This site is located approximately 4,000 feet upriver (northwest) from the boathouse site, which is itself situated ¼ of a mile northwest of the Georgetown Waterfront Park—upstream of the Francis Scott Key Bridge, and is located adjacent to the C&O Canal National Historic Park.

The Commission approved the land transfer and determined that the development of the boathouse on the Park Service tract 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.

The issue of compliance of the Georgetown Waterfront Park plan with the National Environmental Policy Act is discussed at an earlier portion of this report, as it relates to the Commission's current review action of the Wisconsin Terminus. A draft environmental document and request for public comment on the whole of the Georgetown Waterfront Park plan proposal was issued in February 1980 that subsequently led to a revised and final EA document

issued in June 1984. A Finding of No Significant Impact was finalized by the Commission staff in July 1984. A public presentation of the Park plan, as developed at that time, was accomplished at the Commission's meeting of August 2, 1984.

The National Park Service issued an EA for the Georgetown University Boathouse in April 2006, but the final determination of the Park Service for that environmental review is pending.

Issues suggested as relating to the boathouse and the west portion of the Georgetown Waterfront Park involve an area of the park has already been acted on, in a final approval by the Commission, and does not include any portion of the Wisconsin Avenue Terminus park area. The western section of the park discussed in the public's correspondence was approved as a final plan by the Commission in June 2005. The National Park Service has not submitted any revisions regarding that section of the park since receiving final approval, and that section is under construction.

**ATTACHMENTS**

**Robert B. Norris**  
1801 45<sup>th</sup> Street, NW  
Washington, DC 20007  
(202) 333-3925

February 14, 2006

National Capital Planning Commission  
401 9<sup>th</sup> St., NW  
North Lobby, Suite 500  
Washington, DC 20004

Attn: Mr. Gene Keller

Re: Georgetown University Boathouse proposal and related concerns

Dear Members of the Commission:

I hereby request that the National Capital Planning Commission place the National Park Service proposal on the Georgetown University boathouse on the agenda for the April 6, 2006 Commission meeting. Besides finding an environmentally compatible site on the Potomac River for this boathouse, the discussion and resolution of this issue would also entail the need to create a beautiful and interesting urban park on the Georgetown waterfront and the protection and preservation of the integrity of the C&O Canal National Historical Park. Although the Park Service has consistently attempted to separate the C&O Canal Park and the proposed Georgetown Waterfront Park, the two are inexorably intertwined.

To those who would argue that this request is premature, the answer is simple: there are currently enough facts on the table to enable one to make an informed judgment about the propriety and efficacy of the proposal of the Park Service to place a private boathouse in the C&O Canal Park. And, because this matter would eventually in due course reach the Commission for a determination, much time, expense, and effort can be avoided by action now. As the principal federal planning agency for the District of Columbia, this is all together appropriate.

There currently appears to be general acceptance within the Park Service that Georgetown University should be allowed to construct a private boathouse in the C&O Canal National Historical Park at the gateway to the Capital Crescent Trail. This is not the first time the Park Service has proposed an ill conceived project. While almost incomprehensible, a little over 50 years ago, the National Park Service proposed turning the C&O Canal into a vehicle highway. Fortunately, this wrong-headed proposal was stopped in large part by the leadership of the late Justice William O. Douglas. This current project, while not so damaging as the highway proposal, is nevertheless wrong, as I will explain.

Let me be clear. I support a boathouse for Georgetown University on the Potomac River, but not at the location proposed by the Park Service within the C&O Canal National Historical Park near the entrance to the Capital Crescent Trail. I understand that the Georgetown Waterfront Commission, a relatively small group of Georgetown residents, is on record in support of

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Georgetown University's boathouse at this location. The Commission's action was not based on sound urban planning nor did it consider the size of the boathouse proposed by Georgetown University. The real reason behind this position was to exclude this boathouse from consideration at an alternative site at the western edge of the Georgetown Waterfront Park. While I do not question the hard work and devotion of these residents, I do question the somewhat narrow focus of their perception of the design and contents of this urban park and their refusal to even consider the adverse environmental impact of locating this boathouse in the C&O Canal Park. As federal parkland, the Georgetown Waterfront Park belongs not to a small group of residents of Georgetown, but to all of us.

Any structure, and especially a collegiate boathouse at the proposed site, would have an adverse environmental impact and restrict the public's use and enjoyment of this treasured area. Indeed, a boathouse at this location would do violence to the historic and scenic features of the C&O Canal. It would only be accessible over the Capital Crescent Trail which of course is used by bikers and hikers every day of the year. This colossus of a boathouse would be crammed into a relatively small area and would dwarf its immediate downstream neighbor, the historic Washington Canoe Club. It would also loom over the C&O Canal towpath. Indeed, at this location, it would be the McMansion of all boathouses. The proposed dock for this boathouse, jutting some 75 feet into the river, would impinge on the traditional training area used by the Canoe Club for over 100 years.

The proposed location of this boathouse also poses the potential for a hydrological disaster when the next large flood occurs, as surely it will sometime in the future. Powerful currents moving downstream in a flood will be channeled and squeezed between the proposed boathouse nearly 300 feet in length and the C&O Canal embankment. When this happens, the force of the water is magnified and the damage resulting therefrom would be more severe than if the flood waters flowed over a wider area. In fact, this magnified rush of water would probably rip the embankment apart.

As now imposed, the non-motorized boathouse zone extends from 34<sup>th</sup> and Water Sts. to a point variously described by the Park Service as somewhere between 1,100 and 1,250 feet upriver from Key Bridge. This ambiguity as to the upriver boundary obtains because, as a representative of the Park Service testified at a hearing before the DC Council on June 22, 2005, there is no "hard line in the woods" but just a "general guideline." If this zone can be extended from 1,100 to 1,250 west of Key Bridge, why not a similar extension east of Key Bridge.

The only justification by the Park Service for the boundaries of the non-motorized boathouse zone is based simply on the fact that these boundaries were established in the 1987 Plan for the Georgetown Waterfront Park and the C&O Canal National Historical Park. Nearly 20 years old, this Plan is outdated and fails to address the changing needs of the public in 2006. These arbitrarily drawn boundaries fail to recognize the ever expanding public interest in water-related activities as evidenced by the growing number of rowing programs. Indeed, this restrictive boathouse zone is strangling the expansion of the recreational use of the river. Since the promulgation of the Plan in 1987, the Capital Crescent Trail has been established and developed.

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In terms of land use planning, the entire waterfront from Washington Harbour to the Washington Canoe Club should be treated as one integrated and comprehensive area. This would allow for a review and needed modification of the 1987 boundaries which are no longer relevant. In order to protect the integrity of the C&O Canal National Historical Park and the entrance to the Capital Crescent Trail, the proposed site for Georgetown University's boathouse in the Park and immediately upstream from the Washington Canoe Club should be eliminated, once and for all, from any further discussion. For all the reasons well documented in the public record, this particular site for a boathouse is an obvious mistake. If a land use planning mistake has been made, it is far better to correct it now than to regret the consequences of the mistake in the future when corrections may be impossible. What is now needed is a plan with a clear vision for the future which accommodates current realities.

While some would prefer an entirely passive park of trees, grass, walkways and benches, there is no good reason for this type of park to consume the entire 10 acres of the proposed Georgetown Waterfront Park. The artificially and arbitrarily drawn boundary separating the Georgetown Waterfront Park from the non-motorized boathouse zone should be redrawn to reflect the changing needs of the public. Since the Georgetown Waterfront Park is approximately 10 acres, locating Georgetown University's boathouse on a site at the far western edge of the Park adjacent to George Washington University's site would amount to just a small intrusion of less than an acre in a portion of the Park now planned as a buffer of grass and trees. Parenthetically, the 1987 Plan provided for a floating restaurant with space for 86 automobiles at the site now designated for GW's boathouse. As you know, the labyrinth has been shifted approximately 350 feet downstream thereby providing ample space for the boathouse. Most of the currently approved design for the Park would remain in place.

A boathouse at this alternative site would not restrict views to the Park and the river along street corridors perpendicular to Water St. Georgetown University and GW could share access roads and docks, thereby reducing the environmental impact on this area. This site is also deeper and more readily accessible than the originally proposed site. And it would also raise few, if any, NEPA issues. Of course, Georgetown University would bear the cost of site preparation, bulkhead renovation and new construction in this portion of the Park, thereby shifting some of the considerable expenses away from the Park Service and the National Park Foundation. Of critical importance to many, the Park Service has the leverage to insist that the boathouse be well designed and appropriately reduced in size. With the ever expanding public interest in water-related activities, a boathouse at this location would be a contemporary reminder of the early history of Georgetown as a port. In conclusion, two elegantly designed collegiate boathouses, side by side, would anchor the western end of the Park and could be an architectural tour de force.

The draft Environmental Assessment (EA) on the Georgetown University boathouse has been scrapped and a new EA is being prepared from scratch. For the reasons advanced above, as well as by numerous other individuals, it is now abundantly clear that the proposed site for this boathouse within the C&O Canal National Historical Park near the entrance to the Capital Crescent Trail is a land use planning and environmental mistake. Thus, the Park Service, Georgetown University and the public in general have an opportunity to correct this mistake.

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I am also constrained to mention another disturbing aspect about the current attitude within the Park Service. On Friday, January 20, the C&O Canal Advisory Commission passed a resolution stating that the proposed site within the C&O Canal Park is "inappropriate" for a private collegiate boathouse. This message and advice of the Advisory Commission to the Park Service is unambiguous: the National Park Service should eliminate from any further consideration the proposed site within the C&O Canal National Historical Park for Georgetown University's boathouse. The C&O Canal Association has also taken a similar position on this matter. In addition, Defenders of Potomac River Parkland, an alliance of 19 national, regional and local civic, recreational and environmental organizations, ANCD and Federation of Citizens Associations of the District of Columbia have voiced their opposition to the Georgetown University boathouse proposal. It is a sad commentary on the current attitude of the National Park Service when it ignores the advice of these organizations, many of which are specifically devoted to the protection and preservation of the C&O Canal National Historical Park.

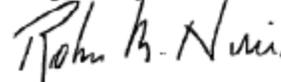
In conclusion, for the reasons set forth above, I submit that the Georgetown University boathouse proposal is flawed ab initio. In these circumstances, I urge the Commission to use its considerable influence to assist in finding an environmentally acceptable site for the University's boathouse while at the same time enhancing the amenities possible for the Georgetown Waterfront Park. Thus, I respectfully ask the Commission to recommend to the National Park Service the following:

- (1) that the Park Service postpone and delay any further work on the Georgetown Waterfront Park until the Environmental Assessment on the Georgetown University boathouse proposal is released to the public and resolved;
- (2) that the Park Service eliminate from any further consideration the proposed site in the C&O Canal National Historical Park for Georgetown University's boathouse; and
- (3) that the Park Service give full consideration to the alternative location at the western edge of the Georgetown Waterfront Park adjacent to George Washington University's boathouse site for the Georgetown University boathouse.

In order to keep the Park Service apprised of my request, I am sending a copy of this letter to Fran P. Mainella, the Director of the National Park Service.

Thank you for your consideration of this matter.

Respectfully submitted,



Robert B. Norris

cc. Hon. Fran P. Mainella

IN REPLY REFER TO  
NCPC File No. 6383

Mr. Robert B. Norris  
1801 45<sup>th</sup> Street, NW  
Washington, DC 20007

Dear Mr. Norris:

I thank you for your letter of February 14, 2006 expressing your concerns and interest in the National Park Service's efforts involving the Georgetown University Boathouse and its proposed siting on the Potomac River near the Chesapeake and Ohio National Historic Park.

As your letter notes, many positions and various parties are currently involved in the discussion of this project with the National Park Service and Georgetown University. However, to date neither entity has developed a revised project plan which would address all concerns and interests of either the community or the sponsors. Furthermore, federal agency internal decision processes regarding the project must be completed, prior to any applicant contemplating a submission to the National Capitol Planning Commission (NCPC). As you state, some of those review processes have now been revised and are still underway. Until the National Park Service completes its re-evaluation of the project with the University and community, the Park Service would not formally submit the proposal to the Commission.

And while I appreciate your evaluation of potential project alternative locations; as you also have clearly noted, other members of the Georgetown area do not support such potential locations. Additionally, I remind you that the establishment of the Georgetown Waterfront Park Plan boundaries and its elements involved many concurrently approving bodies that included the District of Columbia Office of Planning, the Commission of Fine Arts, the District of Columbia Historic Preservation Review Board, the C&O Canal National Historic Advisory Commission, the Citizens' Association of Georgetown, the Foggy Bottom Citizens' Association, and NCPC. Consequently it would be presumptuous of the Commission staff to suggest changes to the park

Mr. Norris  
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master plan without the benefit of allowing other viewpoints to be taken under consideration regarding a revised Georgetown University project affecting the Waterfront Park. To obtain such input requires a specific proposal and related information that currently does not exist at the Commission.

I'm encouraged by your efforts highlighting the many planning points you have related in context with a revised Georgetown Boathouse, and strongly recommend that you ensure that your suggestions for project options be provided in the revised environmental review of the boathouse proposal. However, at this stage of the public planning process the NCPC staff would be unable to competently present to the Commissioners what are the full ramifications of any alternative action. Consequently, it would be unlikely the Commission would support acting in a potentially premature fashion without hearing all detailed facts from the sponsors on what is actually being proposed, and how that would affect either the boathouse project or the Georgetown Waterfront Park.

I thank you for your letter, and I assure you the Commission will consider the subject project fully when it's submitted to the Commission in accordance with all Commission submission requirements.

Sincerely,

Christine Saum, AIA  
Director, Office of Urban Design and Plan Review

**Robert B. Norris**  
1801 45<sup>th</sup> Street, NW  
Washington, DC 20007  
(202) 333-3925

January 19, 2007

National Capital Planning Commission  
401 9<sup>th</sup> St., NW  
North Lobby, Suite 500  
Washington, DC 20004

Attn: Ms. Deborah Young

Re: Proposed Georgetown Waterfront Park and related matters, NCPC File No. 6383

Dear Members of the Commission:

I understand that the Commission has placed the matter of the Georgetown Waterfront Park on the agenda for its February 1, 2007 meeting. NCPC File No. 6383. The purpose of this letter is to challenge the legality of the so-called 1987 Georgetown Waterfront Park Plan, and in particular its implementation, because of the failure of the National Park Service to comply with the National Environmental Policy Act (NEPA). In these circumstances, I hereby request an opportunity to testify before the Commission on this matter at its meeting on February 1.

The National Park Service has failed to prepare either an Environmental Impact Statement (EIS) or an Environmental Assessment (EA) for the proposed Georgetown Waterfront Park. Since it is clear that the boundaries, design and contents of this proposed park may have a significant impact on the human environment, the preparation of at least an EA is mandatory. I cannot believe that the Park Service can seriously contend that a document secretly prepared for internal use in 1984 and labeled "Environmental Assessment" satisfies the legal requirement in this regard. In any event, this 1984 "EA," only made public on July 14, 2006, is completely obsolete and fails to address current needs and realities. At the very least, this stealth 1984 "EA" is deficient, if not defective, for there was no public notice, comment or review, rendering it inoperable.

Even the recent public disclosure of the existence of this 1984 "EA," after some 22 years, constitutes a tacit admission by the Park Service that before it can proceed with the implementation of the Georgetown Waterfront Park Plan, it must first, as a matter of law, prepare either an EA or an EIS addressing environmental concerns. Parenthetically, the 2005 "Compliance Summary" is a self-serving attempt by the Park Service to do indirectly what it failed to do directly. As in the case of the 1984 "EA," there was no public notice, comment or review.

As the members of the Commission may know, several participants in the scoping session held on January 11, 2005 for the pending EA on the Georgetown University boathouse proposal identified alternative sites for the University's boathouse. One of these sites is located adjacent to and immediately downstream from the boathouse site promised George Washington University at

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34<sup>th</sup> and Water Sts. In my opinion, this is an environmentally preferred location for the University's boathouse. This site is located at the very western end of the proposed Georgetown Waterfront Park, an area now planned as a buffer of grass and trees.

It is not my intention in this letter to seek a delay in the work on the proposed Georgetown Waterfront Park but rather to seek an understanding that this site remain viable as a prospective location for Georgetown University's boathouse. Also, any work performed on the park, especially in Phase 1 of the Plan, should not be used as an excuse or reason for eliminating this site from consideration.

There is a solution to this imbroglio. The National Park Service should prepare a comprehensive EIS with full public participation for the entire waterfront area from Washington Harbour to the site just upstream from the Washington Canoe Club. This EIS should consider all of the alternative locations for Georgetown University's boathouse outside the C&O Canal National Historical Park. In this connection, I understand that the Park Service is currently giving serious consideration to the preparation of an EIS for the Georgetown University boathouse proposal.

With respect to the issues I've raised in this letter, I believe it would be appropriate for the Commission to review my letter to the Commission of February 14, 2006, Christine Saum's response, dated February 21, 2006 and my reply to her, dated March 1, 2006. In this connection, I respectfully request that this correspondence be made part of my presentation to the Commission.

In conclusion, the Park Service is still in control of the Georgetown University boathouse proposal as well as the proposed Georgetown Waterfront Park. To the extent that the Commission is in a position to influence the ultimate contents of the proposed Park, if an environmental and land use planning mistake has been made, it is better to correct it now than to regret the consequences in the future when corrections may be impossible.

Respectfully submitted,

Robert B. Norris

**From:** David Winer  
**Sent:** Friday, January 19, 2007 3:26 PM  
**To:** NCPC General Information  
**Subject:** NCPC Meeting on 1 Feb 07: File Number 6383

Re: Georgetown Waterfront Park--February 1 Commission action: approval of revised preliminary site and building plans pursuant to 40 U.S.C. § 8722(b)(1) and (d)

Ms Deborah B. Young, Secretary to the Commission

Dear Commissioners:

Planning for the Georgetown Waterfront Park urgently needs to correct earlier decisions. Parochial Georgetown groups have strongly influenced the current plan to suit their own narrow notion of public purpose. Decision-making for this designated National Park must include input from citizens of the wider community--citizens who could and should benefit from this important public project.

The greater Washington community is becoming increasingly aware of the injustices surrounding the planning for the waterfront up-river from Wisconsin Avenue. Because of significant impacts on the land, and on generations of citizens to come, this park project requires an open study, with a full Environmental Impact Statement. The study should address all the heretofore piecemeal plans for the waterfront. It should include boating and other recreational facilities, transportation through the area, riverine environmental factors, and scenic quality on both sides of the Potomac.

This parkland is ideal for extending the so-called boathouse "zone" to provide access to the river by private citizens, high school rowing programs, and the local universities. If done properly, the Waterfront Park could eliminate the controversial taking of land from the C&O Canal National Historic Park for use by Georgetown University—and in such a way that everyone would benefit. There would still be plenty of space for traditional park amenities sought by Georgetown organizations.

Sincerely,

David E. Winer  
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**From:** Sally C. Strain  
**Sent:** Thursday, January 25, 2007 3:58 PM  
**To:** NCPC General Information  
**Subject:** NCPC meeting of Feb. 1 - File No. 6383 (Georgetown Waterfront Park) - Edited version

Attn Ms. Young - Following is an edited version of my email to NCPC of Jan. 19. Please verify receipt of this new version and disregard the original submission. Many thanks, Sally

Dear Members of the Commission:

The National Capital Planning Commission (NCPC) should postpone consideration of Phase 2 of the GTWaterfront Park Plan until the National Park Service (NPS) has conducted a comprehensive Environmental Impact Statement (EIS) of the entire waterfront area that considers alternatives. There are many reasons why the current plans for Phase 1, Phase 2 and the non-motorized boathouse zone are not in the public interest:

1. The current waterfront plan is the result of an outdated, flawed and piecemeal plan of 1987-89. (Circumstances along the waterfront have changed in 20 years.)
2. The NPS has based Phase 1 and Phase 2 of the plan on an inadequate Environmental Assessment (EA) dating from 1984. (The EA is more than 20 years old, it pre-dates the 1987-89 plan, and it is obsolete.)
3. The non-motorized boathouse zone, proposed as part of the same waterfront park plan of 1987-89, has not been addressed in a comprehensive way. (As early as 1997, the Georgetown Waterfront Boathouse Committee of the Georgetown Waterfront "Commission," which operated from 1997-2004 with the participation of the NPS, rejected all of the NPS-proposed boathouse sites, finding two of the sites "not feasible because of floods and the sewage line that traverses these properties," and the other two sites "not deemed safe either because of water currents under the bridge or because of traffic." Ref. Georgetown Waterfront Commission meeting minutes of June 10, 1997.)
4. Despite the Boathouse Committee's rejection of the sites proposed by the NPS, two have been "assigned" by the NPS to private interests -- Georgetown University and George Washington University -- for their exclusive use. (What is the basis of private ownership of the Georgetown waterfront -- not the Capper-Cramton Act, not the NPS Organic Act and not even the Georgetown Waterfront Park Plan itself.)
5. Since 2003, Defenders of Potomac River Parkland, an alliance of 23 civic, conservation and recreation groups [www.savethecanal.org](http://www.savethecanal.org) representing thousands of citizens, has called for an EIS of the Georgetown waterfront that will seriously consider alternatives outside the C&O Canal National Historical Park for an enormous, private collegiate boathouse and other development planned for the area. (The NPS should consider the following alternatives -- and others -- instead of proceeding with the current piecemeal and outdated plan: (1) Thompson's Boat Center - Use university funds to upgrade/expand this public boathouse that needs repairs, and increase the storage capacity by building several smaller boathouses/storage/launching areas nearby for public, private and collegiate programs, such as the area across Rock Creek from the Swedish Embassy where hulls are now stored on a temporary basis; (2) 34th St. and Water/K Sts. (West side) - A "universal" boathouse for private and public use (like Thompson's Boat Center) instead of two separate private university boathouses along the constricted waterfront and a third (still unfunded) public facility, as per the current plan. The "universal" boathouse might include a public viewing stand (on the roof!) and other public amenities. This alternative offers many land use, environmental, practical, financial, safety and community benefits; (3) 34th St. and Water/K Sts. (East side) - A Georgetown University boathouse next to the proposed George Washington University boathouse, on more accessible, already degraded land in need of redevelopment. At this location, GU could sponsor boating programs for other groups in the community -- unlike at the "encumbered" C&O Canal NHPark site, where zoning restrictions prohibit broader use of the \$15-17 million facility because of

the fragile, bottleneck location along the Capital Crescent Trail, a busy public recreational and commuter corridor with 18,000 users weekly.)

6. Others who are concerned about the current boathouse plan include: three Congressmen with contiguous constituencies on both sides of the Potomac River, the C&O Canal National Historical Park Advisory Commission (federal commission), Advisory Council on Historic Preservation, DC State Historic Preservation Office, DC Federation of Citizens Associations, two ANCs in the District of Columbia, Ward 3 DC Council Member, DC City Council Chair, Endangered Species Coalition, DC Preservation League, National Trust for Historic Preservation, Washington Area Bicycle Association. (A better boathouse plan is possible that will protect the C&O Canal Park from private development, provide boathouses for university, high school and public groups at more accessible locations outside the C&O Park, share in the costs/contribute to the redevelopment of the waterfront, and ensure a safe and enjoyable experience for visitors to the C&O Park and the waterfront area outside the C&O Park.)

7. Phase 2 (Wisconsin Ave.-31st St.) should be simplified to save cost, ensure safety and eliminate the need for extensive and expensive maintenance: Eliminate the fountain, the steps, the bioengineering along the river edge, the gazebo. (The proposed fountain is costly and redundant -- there already is a spectacular fountain nearby at Washington Harbour. The proposed steps pose safety issues for the public and would require costly maintenance following floods and fiestas. The bioengineering plan is costly, untested and might fail during floods -- witness the landscaping/bulkhead that failed at Rock Creek next to the Swedish Embassy during the flood of June 2006 that resulted in serious erosion.)

8. There are many other reasons why the NPS should conduct a comprehensive EIS of the entire waterfront before proceeding with Phase 2, all consistent with the National Environmental Policy Act and the National Historic Preservation Act: Direct, indirect and cumulative impacts to the area from the proposed construction of a passive park, three new boathouses and an unspecified bike path and link between the Capital Crescent Trail and Rock Creek Park; unknown hydrological impacts to the waterfront; potential impacts on nearby historic properties without a meaningful historic review; value of the public land proposed for trading to private interests; potential impacts on public health during and after construction; public controversy; opportunity to update an old and flawed plan and to share the costs of the waterfront redevelopment with universities.

For 20 years the NPS has disregarded public comments on the Georgetown Waterfront Plan. But it is not too late to correct a serious and costly land use planning error: The NCPC should require the NPS to conduct a comprehensive study and EIS that will take a "hard look" at alternatives for the Georgetown waterfront before approving Phase 2 of the current plan.

Sincerely,

Sally Strain, DC Coordinator  
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