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Mr. Kevin Brandt, Superintendent
C&O Canal National Historical Park
1850 Dual Highway, Suite 100
Hagerstown, MD 21740-6620

Dear Mr. Brandt:

Please include the comments below in the public record on the Environmental Assessment for the proposed Georgetown University Boathouse.

NEGATIVE HYDROLOGICAL IMPACTS OF PROPOSED BOATHOUSE ABSENT OR INADEQUATELY ADDRESSED IN THE EA:

The proposed boathouse would adversely impact downstream and adjacent historic properties, specifically the historic Washington Canoe Club and the C&O Canal embankment and towpath. This is because the removal of brush and vegetation and the "flow through" design of the proposed boathouse would cause flood waters to reach downstream structures with much greater force than is currently the case. Flood waters are now absorbed and buffered by the soil, trees, and undergrowth immediately upstream of the Canoe Club, between the river and canal embankment.

The powerful currents moving downstream in a flood will also be channelized behind the proposed new structure, against the historic and fragile C&O Canal embankment. The EA states (table 3) that the flow velocities reaching the embankment could increase 40-100%. When the force of the water is magnified to this degree the erosion and damage is much more severe. In a large flood, the damage will be very extensive and expensive to repair, severely taxing the federal resources. The recently finished and very costly repairs to the canal areas upstream that were caused by flood waters over a decade ago are an indication of what NPS faces if this proposal moves forward.

Most importantly, fast-moving and powerful flood waters now move past the front of the Washington Canoe Club structure without the formation of a backwater or eddy. When backwaters or eddies are formed during a flood, they quickly fill with trees, barrels, timber and other large floating debris that are washed by rising water from areas upstream. These materials are moved around by the currents in the backwater at great speeds and with great force. Such materials moving around in an eddy in front of the Washington Canoe Club site would essentially constitute a number of battering rams which would damage or destroy the historic building.

Such an eddy is exactly what will result from the permanent portions of the docking area for the proposed boathouse that would protrude extensively into the river under the current design.

These very serious issues, typical of any proposal for construction in a 100-year floodplain, require an extensive review by a qualified hydrologist. Yet the potential for flood velocities are barely acknowledged in the EA, and the potential for eddies is missing.

To comply with NEPA requirements for full analysis of the potential environmental impacts, such a review must take place before the serious mistake is made of replacing the natural floodplain with a sleek building, impermeable concrete paths, and massive and permanent docks.

A flood damage simulation should be conducted by the U.S. Army Corps of Engineers and damage protection measures for all the historic structures in the area, not just for the new building, should be determined and planned before a final decision is made and land clearing begins.

The EA does not clarify what studies have been made to date, and public inquiries of NPS to provide such studies have met with no success. I have heard from the May 23 Open House that the analysis used in the EA is obsolete in that it doesn't consider impacts on the canal embankment and riverbank from the designs currently considered in the EA, and therefore these studies may not meet NEPA requirements.

ADVERSE WATER QUALITY IMPACTS FROM POLLUTANT RUNOFF INADEQUATELY ADDRESSED IN THE EA:

In addition to mitigating the flow and velocity of flood water, the soils, vegetation and wetlands in the current riparian buffer between the river and canal embankment absorb pollutants from stormwater runoff on a regular basis, helping to mitigate the degradation of Potomac River water quality from urban areas uphill from the site.

According to the proposed design, a sand filter behind a stone retaining wall at the river's edge could be used to mitigate normal stormwater runoff. However, the proximity of the boathouse and its concrete pads to the river, allowed by a waiver of the normally required DC zoning easement, may prevent any filter from being fully effective in catching and cleansing pollutants. Runoff from the impermeable sections of the site are likely to flow over and around the filters in routine storms, a common and widely recognized problem that exists throughout the DC region wherever riparian floodplains have been destroyed.

The volume and velocity of stormwater and pollutant flow into the river would be further exacerbated by the addition of a new, paved access road through the floodplain behind the new structure and the Washington Canoe Club.

ALTERNATIVES THAT SHOULD BE CONSIDERED:

To avoid the many problems with the proposed site, I support the alternative locations proposed in scoping for the new boathouse, outside the C&O Canal National Historical Park. The land outside the

park, in the vicinity of the Key Bridge, seems well suited to this purpose. The fact that George Washington University proposes to site its boathouse in that vicinity indicates its attractiveness as a boathouse location. The EA also helpfully points out that this area is a traditional zone for boathouses on the Potomac River. There are also other locations on the Potomac, including as on the Virginia side, and even on the Anacostia shoreline, which would work out much better from a hydrologic and environmental point of view.

Thus, I would support a true "no-action" alternative, with no construction of a private boathouse inside C&O Canal National Park, as opposed to the threatening description in the EA about the future possibility of a boathouse at either the downstream or upstream site within the park if Georgetown University's "preferred" alternative doesn't get approved. This language makes me feel that the public is being blackmailed into supporting the private interest of the university at the public expense.

BENEFITS OF ALTERNATIVES:

Any of the alternatives mentioned above would preserve the vegetated floodplain within the national park, and thus maintain the buffer for the canal embankment and the Washington Canoe Club, saving those historic structures from an untimely demise in the next serious flood and minimizing the runoff of stormwater and pollutants into the river during routine storms.

In addition to protecting national parkland, preserving critical, sensitive riparian environments, and avoiding unnecessary damage to historic structures, use of a site further downstream (out of the park and away from the Capital Crescent Trail) would also eliminate the need for a private access road to the new boathouse. This should actually be preferable to Georgetown University since it would provide the athletes and spectators with much better access to the boathouse for events and for construction, maintenance and servicing of the boathouse, and would be much closer to existing public parking areas.

If a serious EIS were done, as I would strongly recommend, instead of merely a superficial EA that fails to address many of the aforementioned issues in detail, other benefits of the alternatives could also be examined more thoroughly.

There seems to be no legal basis under CEQ regulations for the NPS decision not to perform a full EIS, nor for the NPS decision to arbitrarily dismiss the alternative locations proposed by the public during scoping. NPS has failed to demonstrate that these alternative locations are not reasonably, technically and economically feasible alternatives for meeting the needs of the federal agency undertaking the proposed action. NPS has limited its analysis to whether these alternative locations meet an arbitrary set of desired characteristics for the largest, most beautiful and fully equipped boathouse the university could possibly hope for, but neglects to fully analyze whether such characteristics meet the needs of the public and the rest of the regional boating community.

At the public scoping meeting in January 2005, NPS indicated that all possibilities were "on the table," including the consideration of

alternative sites for the boathouse outside of C&O Canal national park. Therefore it is doubly disappointing that NPS has neglected to prepare a meaningful analysis of those alternative sites but instead has arbitrarily dismissed them in the EA because Georgetown University is not willing to make compromises that may benefit the environment, the community, and the public.

I suggest that the failure to comply with CEQ regulations is very likely to lead to litigation and to an unnecessary delay in the construction of any boathouse. All parties involved in discussion of this proposal agree that construction of university boathouses would benefit the entire water-based athletic community. If the Park Service and university would truly consider the logical alternatives, the public, regional, and university needs could be faster and more effectively, with less controversy.

M. Pope Barrow