

**M. Pope Barrow
816 E Street, SE
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January 7, 2008

Mr. Kevin Brandt
Superintendent, C&O Canal National Historical Park
1850 Dual Highway, Suite 100
Hagerstown, Maryland 21742
NCR_Georgetownboathouse@nps.gov

Re: Georgetown University boathouse proposal - scoping comments for the preparation of an EIS, project 15645

Dear Mr. Brandt:

Please include the items below in the scope of the Environmental Impact Statement on the proposed Georgetown University Boathouse on the Potomac River waterfront.

1. IMPACTS OF PROPOSED BOATHOUSE AND DOCKS TO BE CONSIDERED IN EIS:

The proposed boathouse's and dock's hydrologic and hydraulic impact downstream and on adjacent historic properties, specifically the historic Washington Canoe Club and the C&O Canal, including:

- 1a. The projected flow, currents, and speed of floodwaters due to the removal of brush and vegetation; the "flow through" design of the proposed boathouse; and the protrusion of the dock far into the river.
- 1b. The impact of loss of trees and undergrowth immediately upstream of the Washington Canoe Club that currently buffers the impact of floodwaters on the historic Canoe Club building.
- 1c. Channelization of floodwaters behind the proposed new boathouse and dock and impact on adjacent and historic structures.
- 1d. The potential formation of backwaters and eddies filled with trees, timber, and other floating debris washed into the rising waters, and the damage that could be cause by such debris.
- 1e. The potential cost of repairs to adjacent and historic structures.
- 1f. Mitigation measures.

These very serious hydrological issues have not yet been investigated by anyone, and were dismissed as insignificant in the EA. They should be looked into by a qualified hydrologist before a serious mistake is made.

A flood damage simulation should be conducted by the U.S. Army Corps of Engineers and damage protection measures should be required before any land clearing is begun at the proposed site.

2. ALTERNATIVES TO PROPOSED LOCATIONS AND SIZES TO BE CONSIDERED IN EIS:

To avoid the many problems with the proposed site within C&O Park currently listed for inclusion in the EIS, I suggest consideration of the following alternative locations for the new boathouse outside the C&O Canal National Historical Park:

- 2a. Co-locating Georgetown University and George Washington University boathouses underneath the Key Bridge, at the location of the current private townhouses, Jack's Rentals, and Potomac Boat Club.
- 2b. Co-locating Georgetown University and George Washington University boathouses within Georgetown Waterfront Park on the shore in the vicinity of 34th Street.
- 2c. The land immediately downstream of the Washington Canoe Club (the so called "Dempsey boathouse" site) for the Georgetown University boathouse.
- 2d. The Anacostia shoreline for the Georgetown University boathouse.
- 2e. The originally proposed sizes for the Georgetown University boathouse, which were significantly smaller than the currently proposed alternatives of 15,000-19,000 square feet and yet were considered at the time to be of sufficient size by Georgetown University, and in fact, were proposed by the University in their presentation to the Washington Canoe Club. Why have smaller sizes been dropped from consideration in this EIS?
- 2f. Docks that do not protrude into the river and do not block existing river traffic.

3. BENEFITS OF ALTERNATIVE LOCATIONS TO BE CONSIDERED IN EIS:

The alternative locations mentioned above would preserve vegetated national parkland in the floodplain and maintain the vegetative buffer for the canal and the Washington Canoe Club, thus saving those historic structures from an untimely demise in the next serious flood.

Please evaluate the benefits of these alternative sites in terms of:

- 3a. Protecting national parkland and preserving it for public use.
- 3b. Preserving critical, sensitive riparian environments.
- 3c. Floodplain and floodwater management.
- 3d. Avoiding unnecessary damage to historic structures.
- 3e. Eliminating the need for a private access road to the new boathouse.
- 3f. Better accessibility to the boathouse for Georgetown University athletes and spectators for events and for construction, maintenance and servicing of the boathouse, and proximity to existing public parking areas.

4. COMPREHENSIVE NATURE OF EIS:

This piecemeal approach of examining the impacts of the Georgetown University boathouse proposal alone, without consideration of other rowing needs and neighboring issues at the same time in a comprehensive EIS, will lead to further confusion, delays, and lawsuits.

Please consider in one EIS:

- 4a. The boathouse space and river access needs of all universities and high schools with rowing teams, particularly the Georgetown University and George Washington University; the Olympic training teams sponsored

by the Washington Canoe Club; the Potomac Boat Club members; and individual recreational kayakers and canoeists.

4b. The cumulative impacts of all of the boathouses proposed in the Georgetown waterfront boathouse plan, particularly the Georgetown University and George Washington University boathouses, a boathouse for high schools, and boathouse proposals for the public.

4c. The cumulative impacts of all the current and future proposed boathouses combined with the Georgetown Waterfront Park, the Whitehurst Freeway proposals and plans, and future proposals and plans for the C&O Canal and Capital Crescent Trail.

Sincerely,

M. Pope Barrow