

## Department of the Environment



March 6, 2008

Alan Harwood  
EDAW Inc.  
601 Prince Street  
Alexandria, VA 22314

VIA FACSIMILE: 703.549.5869

Dear Mr. Harwood:

Thanks for the opportunity to offer comments on behalf of DDOE at last week's EIS scoping meeting for the Georgetown Boathouse. As things were moving quickly, I wanted to send a quick note to summarize DDOE's primary concerns that we hope will be addressed in the draft EIS.

- Wetlands. DDOE's consideration of wetlands is not necessarily limited to those claimed by the Corps, so we are extremely interested in understanding the impact of any boathouse project on any wetlands, regardless of site.
- Floodplain impacts. Given recent changes in the accepted FEMA floodplain maps, DDOE would like to see an analysis of the impact of any development on potential flooding in the District.
- Impact of any development and construction on any threatened or endangered species in the vicinity, with specific emphasis on the short-nosed sturgeon.
- Short-term and long-term impact of any development and construction on the District's aquatic and fisheries resources.
- Hydrologic impacts of the development.
- Hydraulic impacts of the development (including any piers or other structures that might impact river flow).
- Impact on public access to the waterfront. We are specifically interested in ensuring the maximum opportunity for District residents—not just members of private universities or clubs—to enjoy the environmental and recreational benefits of the Potomac waterfront and national parkland.
- Stormwater issues. Given the proximity to the Potomac River, DDOE is especially interested in ensuring that impervious area is minimized, and that stormwater runoff from areas made impervious by any development is treated on-site. While many of these issues can be addressed at the design stage, initial consideration of site conditions can significantly impact the scope of design options available to meet the necessary standards.



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- Site variety. DDOE appreciates the willingness to consider sites other than the university-owned property and the EA site in order to best answer the question: “If a boathouse is to be built, where is the most appropriate site?” We hope that the
- consideration of possible sites will be as wide as feasible, and will not necessarily be limited at the outset to NPS property.
- River use. It is important that all District residents and visitors have access to the Potomac River for recreational opportunities. The EIS should consider the impact of proposed development, including piers extending into the river, on all river users, including users of small vessels such as kayaks and canoes.
- Disruption of bicycle commuters and recreational trail users. Given the proximity to important bicycle routes, the EIS should examine the impacts of construction activity and the operation of the boathouse on the bicycle commuters and trail users.
- Increased congestion. The construction of a boathouse—combined with other riverfront development—has the potential to increase congestion and negatively impact air quality in the region. The EIS should, along with its traffic study, consider the air quality impacts of increased development along the riverfront.

In addition, given the breadth of the potential environmental impact of the overall land transfer and development, **DDOE strongly suggests the inclusion of adequate meaningful alternatives to the proposed action** that will address the perceived need for improved rowing facilities while holistically addressing the impact of such alternatives on the natural environment and District residents’ experiences of it.

If DDOE can offer any assistance as the draft EIS is prepared, please do not hesitate to contact Shane Farthing at 202.741.0843, or by email at [shane.farthing@dc.gov](mailto:shane.farthing@dc.gov). We will be happy to assist you in connecting with any of our relevant divisions or technical experts. In addition, DDOE would appreciate your willingness to communicate with us as appropriate on major issues raised by the Corps of Engineers, as any future permits to be issued by the Corps for this site will require certification by the DDOE Water Quality Division.

Again, we appreciate the opportunity to express our concerns and look forward to the opportunity to participate fully in this process.

Sincerely,

Christopher Carew  
Acting Chief of Staff

