

June 22, 2005

Ms. Carol Schwartz, Chair
Committee on Public Works and the Environment
1350 Pennsylvania Avenue, NW
Washington, DC 20004

RE: Proposed Georgetown University Boathouse

Dear Chair Schwartz:

I am writing to you on behalf of the Potomac Conservancy, a regional conservation organization dedicated to protecting the health, beauty and enjoyment of the Potomac River and its tributaries. As I am sure you are aware, the health of the Potomac River and its tributaries is in big trouble. The river is not safe for swimming or fishing in many places. Scientists are predicting that a ten-mile long algae bloom will plague the Potomac just below the District of Columbia for several months this summer. We need the District to be an eager and leading part of the solution so that this incredible resource can be enjoyed by our millions of residents, and for future generations.

In addition to the Potomac's serious health issues, the river's scenic beauty is slowly dying a death by a thousand cuts. Trees are being cut down, depriving the river of critical water filtering functions and wildlife habitat. Insensitive development is happening every day up and down the river, with tacit approval from our leaders, decision-makers, and government entities, exacting a critical toll on what was once proudly named the "Nation's River."

The District has an opportunity to be part of the solution. The DC Council passed into law the "District of Columbia Environmental Policy Act of 1989." This law creates a mechanism for review of the environmental impacts of private and public actions, and requires consideration of alternatives, cumulative impacts and mitigating measures.

With regard to the proposed Georgetown University Boathouse, I urge the DC Council to **conduct your own environmental impact assessment, and review of potential alternatives and mitigating measures**, regardless of the assessments currently underway under the direction of the National Park Service.

Why should the DC government undertake the expense of its own environmental assessment when one is already being done by the Federal government? It is very clear to our community in the District that there are reasons not to trust the assessment being conducted by the Federal government. Federal government's original assessment failed to meet the letter and intent of NEPA in a variety of ways. The DC Council should follow the letter and intent of its own law by conducting its own environmental

assessment that fully and fairly considers the impact of this proposal to the natural environment and the scenic integrity of the Potomac River. The DC law does permit a full Environmental Impact Statement (EIS) conducted in accordance with NEPA to be used as a substitute in certain circumstances. However, in this particular case, it appears that the necessary full EIS may not in fact be conducted by the Federal government. In addition, this development is too significant and has too great of an impact for the District to rely on the potentially faulty analysis prepared by another entity that is not required to consider what is in best interest of the District.

I urge the DC Council to carefully consider the *relationship of this proposal to the District's Comprehensive Plan and to the Plan for the Georgetown Waterfront Park and the C&O Canal National Historical Park* (by the National Capitol Planning Commission). DC Council needs to *consider alternatives* beyond the two considered in the Federal assessment (1. build a boathouse; 2. do not build a boathouse). Potomac Conservancy believes that alternative sites are available for this proposal. Finally, no matter what site is considered, there needs to be *consideration of mitigation measures* that would minimize and reduce any adverse environmental impact. Clearly, whether an undeveloped site is ultimately selected, such as the one currently in question, or an already developed site, environmental considerations related to soil and erosion, destruction of vegetation, and impacts to the shoreline need to be comprehensively and carefully considered.

Thank you for the opportunity to share the views of the Potomac Conservancy and for your attention to this important matter.

Sincerely,

Meredith Lathbury
Vice President for Conservation,
General Counsel