DATE: March 13, 2003

TO: Director
District of Columbia Zoning Commission
441 4th Street, NW, Ste. 210
Washington, DC 20001

FROM: Steven Cohn
c/o
Capital Yacht Club
1000 Water St. SW
Washington, DC 20024

SUBJECT: Zoning Commission Case #02-42 ,Waterfront Open Space

First, permit me to introduce myself to you. I am an industrial hygienist employed with the federal government. I have more than twenty years of experience in environmental management and regulatory compliance. I have served as both the Rear and Vice Commodore for the Capital Yacht Club.

The Capital Yacht Club has made great investments to clean-up the Washington Channel. The Club has installed waste receptacles along the sea wall, installed emergency spill kits, purchased an oil and anti-freeze collection station, developed and implemented a storm water management plan, hired staff to clean the public walkway along the seawall, and requires members to keep vessels in compliance with all environmental regulations.

The current environmental impact study in the plan fails to fully consider the effects of development along the Washington Channel. DC Official Code § 8-109.01 requires environmental impact studies before implementation of a plan, and such provision requires that any development minimize or have no environmental effects. The current plan makes provisions for major development of the Washington waterfront. An increase in density will adversely affect the environment and the efforts to clean up the Potomac and Anacostia Rivers.

The Plan does not state that numerous migratory birds and fish visit the Washington Channel every year. The plan does not mention the presence of endangered species such as bald eagles in the area. The increased pressure of commercial and residential redevelopment will have a significant environmental impact. Not to mention the increased trash in the Channel, River and eventually the Chesapeake Bay.

Jones v. District of Columbia Redevelopment Land Agency, 499 F.2d 502 (1974). In Jones, the environmental impact study was required by 42 USC § 4332(2) (C). The analogous provision is found in DC Official Code § 8-109.01, and it applies to the District government as well as private developers.

Please consider the environment before redevelopment.

ZONING COMMISSION
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Exhibit 33

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CASE NO. 02-42
EXHIBIT NO. 33