



# United States Department of the Interior

NATIONAL PARK SERVICE  
NATIONAL CAPITAL REGION  
1100 OHIO DRIVE, S. W.  
WASHINGTON, D.C. 20242

L30 (NCR-LUCE)

5 DEC 1985

## Memorandum

To: Chief, Water Resources Division  
Fort Collins, Colorado

From: Regional Director, National Capital Region

Subject: Floodplain Management and Wetland Protection Guidelines

In response to your memorandum of August 5 we are pleased to forward for your review our comments regarding the proposed revisions to the floodplain management and wetland protection guidelines.

Under Section 1 of the revised text it is recommended that the word "beneficial" be deleted and the words "and wetlands" be inserted after "floodplain."

The revised text would read as follows:

"These orders are significant policy initiatives tying together the need to protect lives and property with the need to restore and preserve natural floodplain and wetland values."

This rewording would unify the joint purpose of the guidelines with regard to both Executive Orders 11990 and 11998 while not differentiating as to whether a value must be solely beneficial.

Under Section 2 of the revised text, the words "floodplain and" should be inserted before the word "wetland" to maintain consistency with the purpose as defined under Section 1.

Under Section 5B, 2b, it is suggested that the revised text be expanded to include all day-to-day activities that may be required in the administration and operation of park areas that are primarily located in the floodplains and not limit this section to picnicking and camping.

A major consideration in the administration of the National Capital Region is that the majority of park areas within the metropolitan area are within floodplains serving a population of approximately 5 million people with extensive open space, recreational, and cultural activities and facilities.

The revised text would read as follows:

"Picnic, camping, and similar recreational facilities, including the provisions for support facilities, provided that floodproofing of facilities, including sanitary facilities and potable water supplies, is a consideration in their design and construction.

Under Section 6C, the revised text should include a reference to the development or inclusion of a wetland/floodplain inventory as part of the preparation of the data base. If Section 6B is deleted, it is important that the glossary be revised to include a definition of a database so that the full array of impacts can be developed as specified by Section 6C (4).

Under Section 9G, it is suggested that the Regional Director be delegated the complete responsibility for determination and approval of an action involving the use of a floodplain or wetland area in lieu of forwarding a separate Statement of Findings to the Director for subsequent approval after a determination has been made under NEPA compliance.

Under existing NPS guidelines the Regional Director is responsible for assessing and determining the significance of all actions involving the use of park resources as to whether the action is considered a major action requiring the preparation of an EIS, FONSI, or falls within the purview of a categorical exclusion. In this respect, the preparation of a separate Statement of Finding is redundant.

To assist your office in the compilation of comments, we have enclosed a copy of each of the individual comments received from the parks and offices in this Region.



Enclosures

bcc:

NCR Surname/Files  
LANTI-Supt. Leimer  
GWMP-Supt. Byrne  
MANA-Supt. Swain  
PRWI-Supt. Harney  
P-Mr. Carlstrom

LUCE-Mr. Knoedler  
CATO-Supt. McFadden  
HAFE-Supt. Campbell  
NACC-Supt. Ruback  
ROCR-Supt. Ellard  
CHOH-Mr. Murphy

LUCE-Files  
CHOH-Supt. Stanton  
JFKC-Supt. Larson  
NACE-Supt. Kearney  
WOTR-Ms. St. Jacques

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## Comments on Floodplain Management and Wetland Protection Guidelines

### Professional Services Division, NCR

#### General Comments:

Practically speaking, any development in a watershed could have an effect on the floodplain or wetlands downstream without actually being installed within these zones. For example, development in a watershed affecting stream flow may cause channelization which would depress the water table and severely impact floodplain ecology.

Though implied, but not specifically mentioned, exotic organisms, particularly plants, can create disastrous perturbations to floodplain and wetland ecology, e.g., hydrilla at Dyke Marsh. Management guidelines should contain prohibitions, or at least caution, against introduction of exotics into any floodplain or wetland.

#### Specific Comments:

Section 6(B) should be retained. It includes the vital term "inventory." Early identification of potential problem areas is one of the most effective means of coming to grips with threats to floodplains and wetlands. Actually, it has already been suggested that this item be removed from Section 3(E) to be included in the Procedures. Perhaps the second half of the section could be eliminated beginning with "Identification of the base floodplain...."

Section 6(C)(4) could include an expanded array of impacts. Perhaps it would be beneficial to include impacts to wetlands from ground water withdrawals (in some cases leading to salt water intrusion or even drying up of wetlands) as well as to floodplains from channelization.

### C&O Canal National Historical Park

The guidelines have not been clarified sufficiently to address the realities of managing inland parks containing extensive floodplain areas such as river valleys subject to high water (C&O Canal, George Washington Memorial Parkway, National Capital Parks-East, and National Capital Parks-Central). Sections 5(B)(2) and 5(B)(3) touch on the issue, but need to be clarified.

Since Section 5(B)(2)(b) is not a complete thought, much less a sentence, we recommend that this be edited to read as follows:

"Picnic, camping, and similar recreational facilities, including the provisions for support facilities provided that floodproofing of facilities, including sanitary facilities and potable water supplies, is a consideration in their design and construction.

Additional language could well be included throughout the guideline to indicate that we are frequently in the business of providing recreational "development" in the floodplain because of the nature of the parks themselves. However, the above change appears to us to be adequate to effectively use the guideline without it being a management hinderance.

#### Harpers Ferry National Historical Park

We have no comments on the content of the guidelines; however, we do have some questions about the revision of Section 7(A).

In response to the 1972 flooding of the park caused by Hurricane Agnes, the park developed a Flood Plan which provides for the safe evacuation of visitors and employees from the flood danger area, and for the protection of historic structures and artifacts that are maintained and displayed in exhibits in the floodplain. The plan provides for the evacuation of residents, removal of artifacts, closure of the lower town, and other activities required to minimize the impact of flooding on the park's resources.

The revision to Section 7(A) of the Guideline provides for options where historic objects, furnishings, collections and other documents are required to be retained within the 500-year floodplain for the purpose of maintaining the historic integrity of the park. It appears that the Section 7(A)(3) is the option that the park uses to minimize the impact of flooding on these resources, that is, we have "an action plan for removal of the resources from the critical floodplain within the limits of available time for warning and evacuation." The sentence following 7(A)(3) states that "A Statement of Findings will be prepared to document the option selected." Since a Statement of Findings will be required as stated in the revision, who will be responsible for its preparation? Also, will the action plan require higher level approval?

#### Prince William Forest Park

Under Section 1 of the revised text it is recommended that the word "beneficial" be deleted and the words "and wetlands" be inserted after "floodplain."

The revised text would read as follows:

"These orders are significant policy initiatives tying together the need to protect lives and property with the need to restore and preserve natural floodplain and wetland values."

Under Section 2 of the revised text, the words "floodplain and" should be inserted before the word "wetland" to maintain consistency with the purpose as defined under Section 1.