



**Date:** April 21, 2008  
**To:** DCOP Staff and Zoning Review Taskforce  
**From:** Julia Koster *Julia Koster*  
**Subject:** Floodplain Draft Proposed Policies and Language

Thank you for the opportunity to comment on DCOP's draft policies and sample floodplain regulation. The following comments are provided by NCPC staff for your consideration. These comments reflect federal interest issues. These comments have not been approved by official Commission action, and additional comments may be provided in the future, particularly as staff and our Commission have the opportunity to review draft updates.

This memorandum provides comments on the Floodplain draft policies and sample flood plain regulation language. If you have any questions, please call Michelle Desiderio at 202-482-7287, or Marjorie Marcus at 202-482-7274.

### **Floodplain**

We understand that maps sanctioned by the District of Columbia Department of the Environment identifying the locations of existing and potential flood plains, wetland and stream valley areas, riparian streams, steep slopes, and other fragile areas under its protection are needed to implement final regulations. When these maps become available, NCPC would like to receive copies in order to remain informed about them.

NCPC staff generally endorses the policies outlined thus far in the document, with the exceptions noted below.

- We request that the policy and sample regulation articulate the rationale for referring two topics to the sustainability working group rather than tackling them here under floodplain regulations, since they appear to be related and potentially to impact the floodplain, ground water table levels, and perhaps even interior flooding. Those issues are:
  - Management of underground water, and
  - Prohibition of/standards for below-grade parking garages in floodplain areas.

Along with other federal agencies, NCPC uses Executive Order 11988 on Floodplain Management, as the main tool to address development within a floodplain. Further, we have coordinated with the General Services Administration and the U.S. Department of State (DOS)

and have provided both with the link to the draft recommendations posted by DCOP on the Zoning Review website currently available for public review.

- NCPC staff recommends that “embassies” as referenced in FP2.2 (c), be removed. Draft language already proposes a prohibition on “one-family dwellings,” therefore, a specific prohibition on ambassadors’ residences would be redundant. Furthermore, in consultation with the DOS, we believe that imposing specific limitations on ambassadors’ residence could have the potential to cause difficulties with respect to the locations of U.S. diplomatic facilities abroad.

Again, thank you for the opportunity to comment on DCOP’s draft recommendations.