



U.S. Department of Homeland Security
FEMA Region II
26 Federal Plaza
New York, New York 10278

FEMA

July 10, 2017

The Honorable Ms. Jeanne Walsh
Supervisor, Town of Rosendale
1915 Lucas Avenue
Cottkill, NY 12419

Dear Ms. Walsh:

Under the Department of Homeland Security's Federal Emergency Management Agency's (FEMA's) previous analysis and mapping approach, if a levee system did not meet the National Flood Insurance Program (NFIP) requirements detailed in the Code of Federal Regulations (CFR) at Title 44, Chapter 1, Section 65.10 (44CFR§ 65.10), FEMA modeled and mapped the system to show no reduction in flooding on the landward side of the levee during the 1-percent-annual-chance flood. Levee systems that do not meet FEMA requirements for protection from the 1-percent-annual-chance flood are referred to as non-accredited. This was the method utilized for the current effective Flood Insurance Rate Map (FIRM) for the Town of Rosendale.

As FEMA produced FIRMs for communities impacted by levee systems, some stakeholders expressed concern about the methods used for non-accredited levee systems. Members of the Senate and House of Representatives echoed this concern and asked former FEMA Administrator Craig Fugate to consider discontinuing the former approach and draw on current modeling techniques to more precisely reflect the level of flood hazard reduction that non-accredited levee systems may provide, while at the same time recognizing the remaining uncertainty. Given the technological advances in data collection and flood hazard modeling, FEMA has proposed an alternative approach for mapping non-accredited levee systems.

FEMA replaced the previous approach with a suite of procedures that are technically sound, understandable to stakeholders, and cost effective. The linked document, "*Analysis and Mapping Procedures for Non-Accredited Levees*," <http://www.fema.gov/media-library/assets/documents/33587> outlines the procedures developed to address Congress' concerns. While these procedures allow for more detailed modeling and mapping of flood hazards for non-accredited levee systems, the risk of flooding in leveed areas remains. Nothing FEMA has proposed changes the need for levee system owners and communities to remain engaged in flood risk management and communication activities.

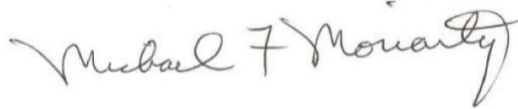
Within the Town of Rosendale, the existing non-accredited levee and floodwall system was originally modeled and mapped using the "without levee" process, prior to implementation of the new Levee Analysis and Mapping Procedures (LAMP) modeling. This levee is located along Rondout Creek. The enclosed maps show the general alignment of the levee and floodwall.

FEMA Region II is seeking your community's response to the proposal to use the new LAMP procedures for the levee system within the community. If you deem this procedure unnecessary for the

levee flood hazard identification affecting the Town of Rosendale, please sign the attached LAMP Recusal Letter and return it to Mr. Shudipto Rahman, Civil Engineer at the address above.

If you have additional questions regarding this request, please contact Mr. Shudipto Rahman., FEMA Region II, Mitigation Division at (202) 702-4273 or by email at Shudipto.Rahman@fema.dhs.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael F Moriarty". The signature is fluid and cursive, with a large initial "M" and a stylized "F".

Michael Moriarty
Director, Mitigation Division
FEMA Region II

Enclosures:

Letter of Declination for Use of Levee Analysis and Mapping Procedure

cc: Nicholas Wulczyn, Building Inspector & Code Enforcement Officer, Town of Rosendale
The Honorable Michael P. Hein, Ulster County Executive
Mr. Dennis Doyle, Director Planning Department, Ulster County
Mr. Bill Nechamen, NY State NFIP Coordinator, NYSDEC