

Agency of Natural Resources

WATER QUALITY DIVISION

March 29, 2010

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> FAX 802-241-3287 TEL 802-241-3770

Mike Goetz Chief, Risk Analysis Branch FEMA Region I 99 High St, 6<sup>th</sup> Floor Boston, MA 02110

Re: Cox Brook Dam Removal - Northfield, Vermont

Dear Mike:

Please find enclosed certified as-built topographic information documenting the physical changes resulting from the Cox Brook Dam removal in Northfield, Vermont. The data is being transmitted to meet the intent of the requirements of 44 CFR, 65.3.

The Cox Brook Dam was a low head – run-of-river dam built in the 1930s. The dam was removed to alleviate safety concerns with deteriorating structure and to restore ecological processes to the brook, including fish migration. As with most dams of this type, the structure did not provide any flood control benefit and as such, the FEMA study contractor did not adjust the flows in the hydraulic model downstream of the dam. Therefore, there is no increase in base flood elevation resulting from dam removal. However, removal of the dam does affect the Flood Insurance Study data in a very localized area; namely the flood profile and floodway data table should be updated to remove the structure and the hydraulic backwater.

This submittal does not meet Letter of Map Revision standards due to the associated costs. River restoration projects, such as the Cox Brook Dam removal, typically have very limited budgets. To hold these projects to strict LOMR submittal requirements, including as-built hydraulic modeling and mapping, would result in many of these projects never getting off the ground. Since river restoration projects in Vermont typically involve removal of encroachments and improve the natural and beneficial functions of the river system, we hope that FEMA will generally concur with the approach of submitting certified as-built topographic data for the restored reach to be archived for future restudy.

We will keenly evaluate each project for potential impacts to base flood elevations and SFHA/floodway delineations to ensure that stringent CLOMR/LOMR standards are followed when appropriate. I welcome your ideas on how we ensure river restoration projects reasonably consider and document impacts to the published Flood Insurance Study data. At your convenience, please call me at (802) 241-1554.

Best regards,

Rob Evans, CFM State Floodplain Manager/NFIP Coordinator River Management Program

