



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240

Doug B

IN REPLY REFER TO:

OCT 26 2000

Mr. Mike Buckley, Chief
Hazards Identification and Risk Assessment
Federal Emergency Management Agency
500 C Street SW
Washington, DC 20472

Dear Mr. Buckley:

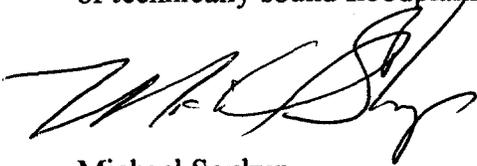
The National Park Service (NPS) has reviewed the Federal Emergency Management Agency's (FEMA) report "Appeal Resolution for Congaree River in Richland and Lexington Counties, South Carolina", dated September 26, 2000 (appeal resolution report) and wishes to document our agency-specific comments. The NPS has a long standing interest in this matter because Congaree Swamp National Monument, a unit of the National Park System, is downstream of the study site and is functionally dependent on the Congaree River. As such, the NPS has participated in the process of evaluating proposed changes to the upstream Congaree River flood maps. We reviewed the August 1999 flood study reports and maps and submitted comments to FEMA on December 10, 1999 and June 1, 2000. Our concerns with this work centered on the manner in which the 100-year flood was derived. We believed that an upstream reservoir was factored into the analysis in an unrealistic way causing the magnitude of the 100-year flood to be considerably underestimated. We also shared concerns expressed by the South Carolina Department of Natural Resources related to aspects of the HEC-2 hydraulic model used in the study.

Given the highly controversial nature of the proposed revision to floodplain maps along the Congaree River, the NPS also asked the U.S. Geological Survey (USGS), as the science arm for the Department of the Interior, to review the hydrologic and hydraulic modeling components of the appeal resolution report for technical adequacy.

Upon our review and that of the USGS of the appeal resolution report, we are satisfied that our concerns with the technique used to compute the 100-year flood have been adequately addressed and we believe the value used in the new study is within the range of reasonable estimates. Regarding problems identified with the hydraulic model, we believe that FEMA addressed the principle concerns raised in the earlier reviews. While the USGS review of the hydraulic modeling in the appeal resolution report identified a few new technical problems, these problems deal primarily with the 2-d hydraulics model (RMA2) used to identify ineffective flow zones on the floodplain. The USGS states that correction of the identified model deficiencies is unlikely to result in significant changes in floodplain delineation. The NPS concurs with this interpretation. A copy of the USGS review of the appeal resolution report is attached to this letter for your information.

In summary, the NPS supports the present appeal resolution report and associated floodplain map. We believe that FEMA, through a rigorous public process, has succeeded in developing scientifically credible and defensible information for the Congaree River floodplain.

Thank you for your efforts in making this an open process that has led to the development of technically sound floodplain information for the Congaree River.



Michael Soukup
Associate Director
Natural Resource Stewardship and Science

Attachment

cc: Martha Bogle, Superintendent, Congaree Swamp National Monument
Robert Hirsch, U.S. Geological Survey
Tom Yorke, U.S. Geological Survey
Paul Sandifer, South Carolina Department of Natural Resources