

## Hilary Foote

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**From:** Daniel, Katherine <katherine.daniel@state.or.us>  
**Sent:** Friday, December 13, 2019 2:36 PM  
**To:** Hilary Foote  
**Cc:** Adair, Celinda; Sarah Absher  
**Subject:** EXTERNAL:Notice of Consolidated Review of 851-19-000510-PLNG and 851-19-000511-PLNG

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Dear Hilary,

I have reviewed the materials available on the Tillamook County website for the above referenced project. The grading is limited to locations within the AE Zone of the floodplain. No portion of the project is located in the regulatory floodway which ends upstream from Highway 101. The project location is on the Kilchis River downstream of cross-section D as shown on FIRM panels 41057C0576F and 41057C0413F. The requirements for encroachments within AE zones without floodways are contained in Tillamook Zoning Code Section 3.510(9)(e) with exceptions to this section located in Section 3.510(9)(f), which indicates that the Kilchis River downstream of cross-section C are not subject to the requirements of subsection (e). The applicant states that the exemptions from subsection (e) apply noting that cross-section C parallels Highway 101. This location appears to be designated as cross-section D rather than C. It is not clear to this reviewer that the project is within the exempted areas where heavy tidal influence and sheet flows make floodway designation inapplicable.

Nevertheless, the project appears to comply with the Tillamook County Flood Hazard Overlay regulations. The Kilchis River Estuary Porter Tract Restoration –Detailed Design Hydrodynamic Modeling Results report prepared by Northwest Hydraulic Consultants Ltd dated July 8, 2019 provides modeling of the proposed condition under typical and peak flow conditions. Figure 9 shows a rise in water surface elevation of less than 0.15 feet predominantly located northeast of the project location and northeast of Highway 101. This figure also shows smaller areas that will experience a rise of up to 0.4 feet in these locations. The base flood elevation of cross-section D is 14.2 feet. Figure 8 of the Northwest Hydraulic Consultants report shows modeling results of water surface elevation in the peak flow condition with proposed restoration will not exceed 11.5 feet.

Reductions in water surface elevation are also predicted by this modeling. Decreases of -0.15 to -0.3 feet are predicted south of Squeedunk Slough are shown in Figure 9 for the peak flow condition.

Although this hydraulic modeling does not utilize the traditional HEC-RAS modeling due to the tidal influence of the Pacific Ocean on the Kilchis River, the modeling allows the conclusion that the cumulative effect of the proposed development, when combined with all other existing and anticipated development, will not increase the water surface elevation of the base flood more than one foot at any point within the community. Therefore, whether the area is exempt from Section 3.510(9)(e) or not, the applicant has provided sufficient analysis to allow the conclusion that the project complies with Tillamook County's Flood Hazard Overlay zone regulations.

Thank you for the opportunity to comment.

Yours,  
Katherine



**Katherine Daniel, AICP, CFM**

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