



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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November 4, 2008

Mr. Brian Shea, Director  
Department of Public Services  
Grays Harbor County  
100 West Broadway Ave., Suite 31  
Montesano, WA 98663-3614

Dear Mr. Shea:

Thank you for the opportunity to review the Draft Grays Harbor County Critical Areas Ordinance. I appreciate you incorporating my previous comments into this second draft.

My comments are strictly related to the minimum standards for floodplain development standards. As you are aware, these minimum standards are outlined in the Code of Federal Regulations at 44CFR 60.3. Additionally, the State of Washington has higher regulatory standards for projects located within the regulated floodway.

Overall, the proposed language found in the Draft CAO complies with, or exceeds, the minimum standards established by both federal and state law. The Department of Ecology Floodplain Management Program would, however, ask you to make several technical changes, as well as provide clarification on language associated with recreational vehicles.

Specifically:

1. 18.06.110(B) – The current language would allow the floodproofing of residential structures. Under Federal Code floodproofing of residential structures is prohibited. Please add the word “non-residential” to this section of code.
2. 18.06.120(A)(4) – Subdivisions of 50-lots, or a single home placed on 5-acres, whichever is less, in unstudied (no Base Flood Elevation data) floodplain areas, requires the applicant to develop the Base Flood Elevation (BFE) using detailed methodology. You will need to add language to this effect. Please refer to the Code of Federal Regulations at 44CFR 60.3(a)(4)(b)(3) for specifics. Additionally, FEMA 265 – Managing Floodplain Development in Approximate Zone A Areas, can be referred to for the methodology to conduct detailed studies.
3. 18.06.120(A)(5) – This section of the CAO refers to “Chapter 8.20” of the Grays Harbor Municipal Code for Recreational Vehicle language. A review of this section of County

Code has resulted in a determination that the language does not comply with the required language associated with floodplain development. Specifically, recreational vehicle language, for floodplain management purposes, must comply with 44 CFR 60.3(c)(14). This requirement is specific for both riverine and coastal floodplains. Please add this language to your CAO.

If you have any questions or need clarification on the specifics outlined above, please feel free to contact me directly at (360) 407-7253.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Farrell", written in a cursive style.

Kevin B. Farrell  
Floodplain Management Specialist  
Washington Department of Ecology – SWRO

KBF:dn