Dear Tillamook County Commissioners,

It is with great concern that we are contacting you regarding the FEMA” Pre implementation compliance measure” to achieve a “no net loss” of floodplain function. These new rules will be devastating to our community, and we are requesting that the county commissioners reject these new rules by FEMA.

These new rules would do the following to our community:

1. Fema’s plan will cause property values to plummet.
2. Fema’s plan will restrict the ability to redevelop and build infrastructure and amenities. This would hinder our farmers ability to repair old facilities but also the ability to build new facilities as needed for expansion.
3. Fema’s plan could potentially cause productive land to be left fallow and unusable because of huge buffer requirements (170ft) from streams, rivers, ponds, lakes and any other water source. This will cause many of our local farmers to lose land they count on to produce feed for their cattle.
4. Fema’s plan will restrict land divisions within, and steer development away from Tillamook County.
5. Fema’s plan will make our housing problem worse, and rent will increase for everyone in the county.
6. Fema’s plan will create new storm water standards that will prevent impervious surface. development such as roads and building expansion within the Special flood hazard area.
7. Fema’s plan will expand the current flood zone requiring additional property owners to purchase flood insurance and subject additional areas to the reduced development potential.
8. Fema’s plan will burden local communities that lack the capacity or the desire to implement these ridiculous requirements.
9. Fema’s plan will put the county at risk of severe litigation by members of the community for their losses.
10. Fema’s plan will start the process of compensatory mitigation of remaining flood plain developments impacts. (Any fill you bring in the flood plain would need to be mitigated, so you would need to dig a hole on your property and haul it out of the flood plain to mitigate the decrease in flood capacity, which would create a water hole that would need a 170ft buffer creating more loss of productive land.)
11. Fema’s plan will force Tillamook County to sign onto a plan that is not transparent or finalized. This would leave Tillamook County in limbo, and at the mercy of Fema’s final plan and its implementation in 2026 and 2027.

The Bi-Ops conclusion that the NFIP harms endangered species is erroneous. FEMA does not have the statutory authority to implement the plan or the Pre-Implementation Compliance Measure. Tillamook County Farm Bureau is urging if not flat out demanding a hard “NO” to FEMA. The consequences of signing on to FEMAS demands far outweigh the consequences of not signing on to Fema’s ridiculous demands. I urge you to investigate the latest Supreme Court decision Chevron Deference and its relevance to this case. Also, if there is any confusion about how the community feels about this issue, I would urge you to have a few public forums so you can hear from your local stakeholders.

Thank you for your time and consideration,

Tillamook County Farm Bureau