Statewide Planning Goal 18
Foredune Grading Requirements
Cannon Beach City Council Work Session – 09/11/2019
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Background:

1) Prior to 1984 foredune grading was prohibited in Oregon.
2) In 1984, the Department of Land Conservation and Development (DLCD) formed an advisory committee of scientists, planners and citizens to determine if grading could be done in a way that would not harm the foredune. The committee was asked to address two questions:
   a. Is it possible to alter foredunes by grading and not compromise their flood and erosion protection qualities?
   b. If so, how should grading, or similar activities, be regulated to assure that these benefits are not significantly reduced or destroyed?
3) The committee concluded that:
   a. A major asset of a foredune is its bulk: more sand means more capacity to absorb ocean wave energy.
      i. Foredune height and width is considered essential:
         1. Height is important because of the potential for large waves to over top the foredune completely and thereby directly attack back slope areas.
         2. Width is important to provide a uniform barrier to ocean flooding and erosion.
   b. Another major asset of a foredune considered essential is its vegetation cover: beachgrass captures windblown sand on the dune, helping build up the dune, and its extensive root system helps bind the sand together in the face of ocean flooding and erosion.
4) The committee recommended that Goal 18 be amended to allow limited grading based on a number of specific and prescriptive requirements. The Goal was amended and these provisions became effective on October 19, 1984.

Oregon Statewide Planning Goal 18 Dune Grading Requirements:

Goal 18, as revised, provides that view (or preventative) grading is allowed in foredune areas only if:
1) The area is committed to development or is within an acknowledged urban growth boundary; and
2) Grading is part of an overall plan for managing foredune grading.

A foredune grading plan shall include the elements below (based on consideration of factors affecting the stability of the shoreline to be managed including sources of sand, ocean flooding, and patterns of accretion and erosion (including wind erosion), and effects of beachfront protective structures and jetties).
The plan shall:

1) **Cover an entire beach and foredune area subject to an accretion problem**, including adjacent areas potentially affected by changes in flooding, erosion, or accretion as a result of dune grading;

2) **Maintain dune height and width requirements** for protection from flooding and erosion:
   a. The **minimum** height for flood protection and erosion control is specified in Goal 18 as 4 feet above the 100 year base flood elevation (BFE);
   b. Essential dune width is to be determined within each foredune management plan.

3) **Identify and set priorities for low and narrow dune areas** which need to be built up;

4) **Prescribe standards for redistribution of sand**;

5) **Prescribe standards for temporary and permanent stabilization measures (planting)** including the timing of these activities;

6) **Prohibit removal of sand from the beach-foredune system**.

Local Government Responsibilities Related to Foredune Grading (Generally):

1) **If a local government wants to allow dune grading in these limited areas:**
   a. They must adopt and use zoning regulations that address and are consistent with Statewide Planning Goal 18 foredune grading requirements.
   b. They must adopt and use a dune management plan that is consistent with Statewide Planning Goal 18 foredune grading requirements.

2) **Coordinate with Oregon Parks and Recreation Department (OPRD)** who regulates uses within the “Ocean Shore Recreation Area.” This includes dune grading activities.

Preventative Grading vs. Remedial Grading

1) Goal 18 requires a plan to grade sand in order to "prevent" sand inundation. The Goal does not require a plan to remove sand which is actually inundating a structure (remedial grading).

2) **Remedial grading** is by its nature maintenance: it is necessary to keep the building functional. Sand which is physically piled up against exterior walls, doors or windows can damage the structure (by rot or breakage) or prevent access into and out of the structure. Removal of sand which is physically piled up against a building and which prevents normal access to the building is remedial and permissible without a foredune management plan.

3) Both because it is intended as a long-term solution and because it constitutes a more major alteration of the foredune, **preventative grading** is prohibited without a full- fledged dune management plan. The Goal requires a management plan for preventative grading because of its potential harmful effects--more extensive grading can increase potential flood damage, increase sand inundation of neighboring properties or damage dune integrity.

For more information on dune grading, contact Meg Reed, Coastal Shores Specialist at DLCD at 541-574-0811 or meg.reed@state.or.us.