## DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION



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# STATE OF MONTANA

WATER RESOURCES DIVISION (406) 444-6601 FAX: (406) 444-0533 www.dnrc.mt.gov

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August 3, 2022

Mr. Harry Katz, CFM Floodplain Management and Insurance, Mitigation Division FEMA Region VIII

RE: Post-2022 Montana Flood Event Policy and "No-Rise" Interim Guidance

### **Definitions:**

Existing Conditions: Post-Flood/Pre-Project conditions utilizing best available data such as Post-Flood

LiDAR or ground survey data

Proposed Conditions: Post-Project conditions; Existing Conditions plus the proposed design elements

Effective Conditions: Regulatory conditions shown on most recent FIRM/FIS or approved Letter of

Map Revision (LOMR)

Pre-Flood Conditions: Pre-Flood LiDAR/Terrain data plus other pre-flood data as available

No-Rise:  $\leq 0.00$  Feet for Zone AE with Floodway, and  $\leq 0.50$  Feet for Zone AE without

Floodway

#### Dear Harry:

Communities in Montana's Yellowstone River Basin recently experienced historic flooding resulting in widespread damage to structures and public infrastructure. High velocity flows from the flood event caused significant bank erosion, migration, aggregation, and/or degradation to rivers, streams, and tributaries; which impacted the accuracy of the effective Flood Insurance Rate Maps (FIRMs) and Flood Insurance Studies (FIS). In many of the flooded areas, the riverine Existing Conditions may no longer match the Effective Conditions.

For communities that participate in the National Flood Insurance Program (NFIP), any development occurring in the Special Flood Hazard Area (SFHA) requires a floodplain development permit from the local community prior to the start of construction and must meet all adopted floodplain management regulations. In order to support communities, property owners and other entities making recovery decisions, the Montana Department of Natural Resources and Conservation (DNRC) is providing this interim policy guidance to clarify project analysis procedures and how to satisfy local floodplain permit requirements. This interim guidance is intended to provide clarification for those communities located in the declared counties (DR-4655-MT) where Effective FIRM and FIS information no longer

| ADJUDICATION   | COMPACT               | STATE WATER     | WATER          | WATER             | WATER          |
|----------------|-----------------------|-----------------|----------------|-------------------|----------------|
| BUREAU         | <b>IMPLEMENTATION</b> | <b>PROJECTS</b> | MANAGEMENT     | <b>OPERATIONS</b> | RIGHTS         |
| (406) 444-0560 | PROGRAM               | BUREAU          | BUREAU         | BUREAU            | BUREAU         |
|                | (406) 444-5700        | (406) 444-6646  | (406) 444-6637 | (406) 444-0860    | (406) 444-6610 |

matches Existing Conditions. It is not intended to apply in communities outside the declared counties or for projects unrelated to current flood recovery efforts. This interim guidance may be superseded as additional flood hazard information becomes available and is not meant to repeal any other local, state, or Federal requirements.

Additionally, this interim guidance is not meant to supersede or contradict FEMA Policy #104-008-2 *Guidance on the use of Available Flood Hazard Information* but rather provide a means for local communities to make sound permitting decisions based on the unique set of circumstances of the disaster. This guidance may not be appropriate for all projects, for example, flood recovery projects being funded by FEMA Public Assistance (PA) may be subject to other requirements. In all cases involving other federal or state funds, the appropriate agency Project Officer or program contact (e.g. FEMA, NRCS, USACE, DNRC, etc.) should be consulted prior to the project commencement.

#### **POLICY GUIDANCE**

The following guidance applies to projects that are located within a regulatory floodway or in a floodplain with BFEs where a floodway has not been defined; and therefore, may require a No-Rise analysis, Conditional Letter of Map Revision (CLOMR) and/or Letter of Map Revision (LOMR). If the project does not fall into one of the scenarios below or is located in an Approximate (Zone A) mapped floodplain, then officials and/or design professionals are encouraged to contact staff from the local floodplain administrator and/or the DNRC (listed below).

### Restoring to Effective Conditions:

Channels may be restored to effective conditions without further analysis. Effective condition is considered the modeled condition reflected in the effective Flood Insurance Study, including floodplain and floodway boundaries, base flood elevations, flows, and channel geometry. The project must adhere to any other federal, state or local regulations and permit requirements.

Projects that were properly designed, permitted, and constructed prior to the flood may be replaced in-kind without further analysis so long as the conveyance equals that of the original structure. The project must adhere to any other federal, state, or local regulations and permit requirements. Reduction in conveyance as a result of sedimentation may require channel modification. Changes in structure design or channel modification must go through the normal review process which may include a No-Rise analysis, CLOMR, and LOMR.

### Stream Crossings and Restoration Projects:

Where current and effective conditions do not match and the community does not intend to return the channel to effective conditions, hydrologic and hydraulic analysis will be required for proposed projects. A No-Rise analysis must demonstrate that the proposed project does not increase water surface elevations of the base flood.

### No-Rise Analysis Procedure:

For all approaches below in **Zone AE** floodplains, *Proposed Conditions* must tie into *Existing Conditions* within 0.00 ft at the upstream and downstream limits of the project area.

• <u>Approach 1:</u> Utilize best available information, specifically Post-Flood event LiDAR/Terrain and/or field survey data, to create a HEC-RAS hydraulic model that best

represents the Existing (Post-Flood) Conditions. Use the Existing Conditions model to build a Proposed Conditions model; which incorporates the proposed/remedial project elements. Both Existing Conditions and Proposed Conditions models shall use the effective FIS hydrology unless more current data is available from DNRC and FEMA¹ (currently limited to Carbon County). Compare the Existing Conditions model to the Proposed Conditions model to determine if rises occur in the water surface elevations of the 1% annual chance flood or Base Flood Elevations (BFEs). If the model comparison results indicate "No-Rise" in BFEs (see definition above), then a FEMA CLOMR is NOT required for the project prior to issuance of a floodplain development permit by the community. If No-Rise is not satisfied, then proceed to Approach 2.

Additional engineering will be required to determine Existing Conditions in areas where the channel has migrated. Existing Conditions should not reflect any man-made temporary work such as temporary crossings, bridges, culverts, hydraulic structures, or other developments that have been constructed since the flood.

<sup>1</sup>Note: When applied with Approach 3, only the effective FIS hydrology may be used.

• Approach 2<sup>2</sup>: Utilize the most recent Pre-Flood LiDAR/Terrain and/or survey data if available (refer to attached DNRC study county figures and tables) to create a Pre-Flood Conditions HEC-RAS hydraulic model and compare to the Proposed Conditions model that was developed in Approach 1. Both Proposed Conditions and Pre-Flood Conditions models shall use the effective FIS hydrology unless more recent analyses are available from DNRC and FEMA (currently limited to Carbon County). Pre-Flood Draft floodplain study HEC-RAS models are available from DRNC for some river reaches within Carbon County (refer to attached DNRC figure for details).

Compare the Proposed Conditions model (from Approach 1) to the Pre-Flood Conditions model to determine if rises occur in the water surface elevations of the 1% annual chance flood or BFEs. If the model comparison results satisfy "No- Rise" in BFEs (see definition above), then a FEMA CLOMR is NOT required for the project prior to issuance of a floodplain development permit by the community. Alternatively, if No-Rise is not satisfied, then a CLOMR is required prior to issuance of a floodplain development permit by the community.

<sup>2</sup>Note: If creating a Pre-Flood model is not possible because adequate Pre-Flood information is not available, then skip Approach 2 and proceed to Approach 3.

• Approach 3: In areas with effective detailed/enhanced studies (i.e. Zone AE) with published FIS profiles and BFEs, compare the Proposed Conditions model (from Approach 1) to the current Effective Conditions to determine if there are any rises. When available, the effective regulatory model data should be utilized. This approach may offer another option to evaluate "No-Rise" criteria without creating an additional model. If the comparison results still signify a rise, then a CLOMR is required before the community may issue a floodplain development permit.

### **CLOMR Requirements:**

A CLOMR may be required when Existing Conditions show increases in water surface elevations of the base flood compared to Proposed Conditions. If the project is located in a regulatory floodway, a CLOMR is required if a no-rise certification cannot be completed according to the guidance outlined above. If the project is located in a floodplain with published BFEs without a regulatory floodway, a CLOMR is required if the project causes more than 0.50 feet of increase in BFEs. For CLOMRs, the standard FEMA MT-2 application and process must be followed.

### **LOMR Requirements:**

A LOMR must be submitted within six months of completion for all projects when the Proposed Conditions model shows an increase or mappable decrease in BFEs compared to the Effective model. The standard FEMA MT-2 application and process must be followed, including as-built information showing Post-Project conditions. It is the community's responsibility to ensure all information is submitted to FEMA in a timely manner.

#### **Recommended Practice:**

As-built hydraulic, topographic, and other relevant data must be provided to the community after the project is completed, along with site inspections, and LOMR submittals when necessary. DNRC advises community floodplain administrators to list these requirements as conditions in their floodplain development permits when applicable.

Local floodplain development permits should also be considered outside of the effective Special Flood Hazard Area (SFHA) where projects are now subject to flood damage as a result of channel migration. This determination must be made by the local floodplain administrator using best available information.

Regards,

Steve Story, PE, CFM

Chief, Water Operations Bureau

406-444-6816 sestory@mt.gov

CC: Dawn Brabenec, Risk Analysis Branch Chief, FEMA Region VIII Thuy Patton, Risk Map Portfolio Manager, FEMA Region VIII Traci Sears, Montana NFIP/CAP Coordinator

### Attachments:

- DNRC Primary Points of Contact
- "Effective" Floodplain Study Inventory Figures and Tables for Carbon County, Park County, and Stillwater County
- "Draft" Floodplain Study Figure and Table for Carbon County



## **DNRC Primary Points of Contact:**

### Floodplain Permitting Technical Assistance:

Carbon, Park, Stillwater, Sweet Grass, Treasure, and Yellowstone Counties:

 Sam Johnson, PE, CFM, Billings Regional Office 406-247-4423
 Sam.johnson@mt.gov

### Flathead County:

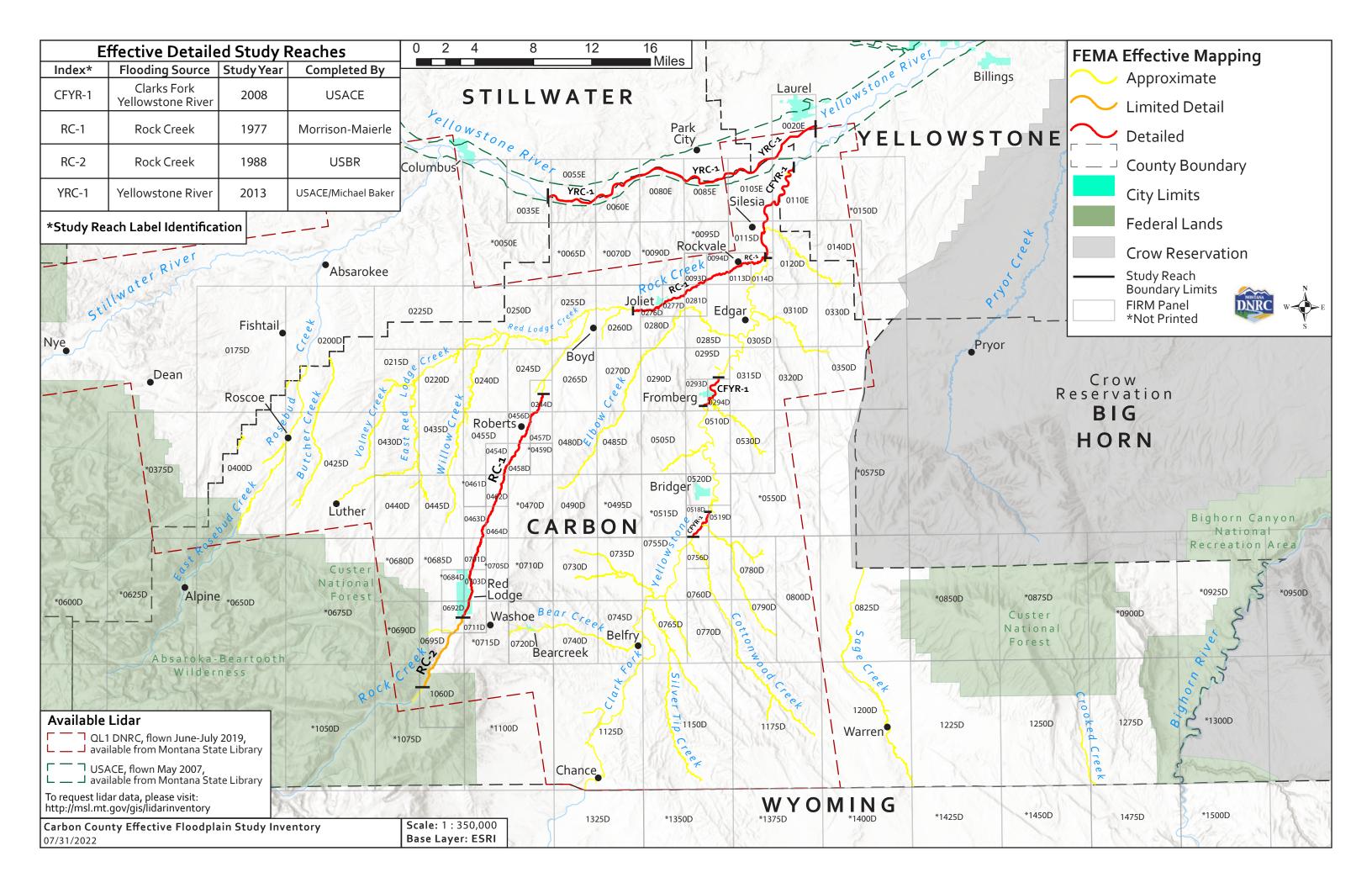
• Larry Schock, CFM, Missoula Regional Office 406-542-5885 lschock@mt.gov

## Existing Floodplain Study Data Requests: Refer to attached county maps and tables.

 Peri Turk, EI, CFM, Helena Water Resources Division Office 406-444-6656
 Peri.turk@mt.gov

# **NFIP/Community Assistance Program:**

 Traci Sears, CFM, State Coordinator, Helena Water Resources Division Office 406-444-6654 tsears@mt.gov





# **Carbon County Effective Floodplain Study Inventory**

|        |                               |       |                      |                     |                |                  |                           | Hydraulics    | Hydraulics       |                      |  |
|--------|-------------------------------|-------|----------------------|---------------------|----------------|------------------|---------------------------|---------------|------------------|----------------------|--|
|        |                               | Study |                      |                     |                |                  | Hydrology Source          |               | Are Model Run    | Are Study-Specific   |  |
| Index  | Flooding Source               | Year  | FIS                  | Completed By        | Study Type     | Zone             | (Completed By)            | Model Type    | Files Available  | Shapefiles Available |  |
| CFYR-1 | Clarks Fork Yellowstone River | 2008  | Carbon County (2017) | USACE               | Detailed       | AE with Floodway | FIS (Morrison-Maierle)    | HEC-RAS 4.0*  | No*              | No*                  |  |
| RC-1   | Rock Creek                    | 1977  | Carbon County (2017) | Morrison-Maierle    | Detailed       | AE with Floodway | FIS (Morrison-Maierle)    | HEC-2         | Microfiche Scans | No                   |  |
| RC-2   | Rock Creek                    | 1988  | Carbon County (2017) | USBR                | Limited Detail | AE               | FIS (USBR)                | HEC-2*        | No*              | No                   |  |
| YRC-1  | Yellowstone River             | 2013  | Carbon County (2017) | USACE/Michael Baker | Detailed       | AE with Floodway | FIS (USACE/Michael Baker) | HEC-RAS 4.1.0 | Yes              | Yes                  |  |

\*DNRC does not have a copy of this data at this time, but is working towards obtaining a copy. Please contact DNRC if you would like to be notified when these are available.

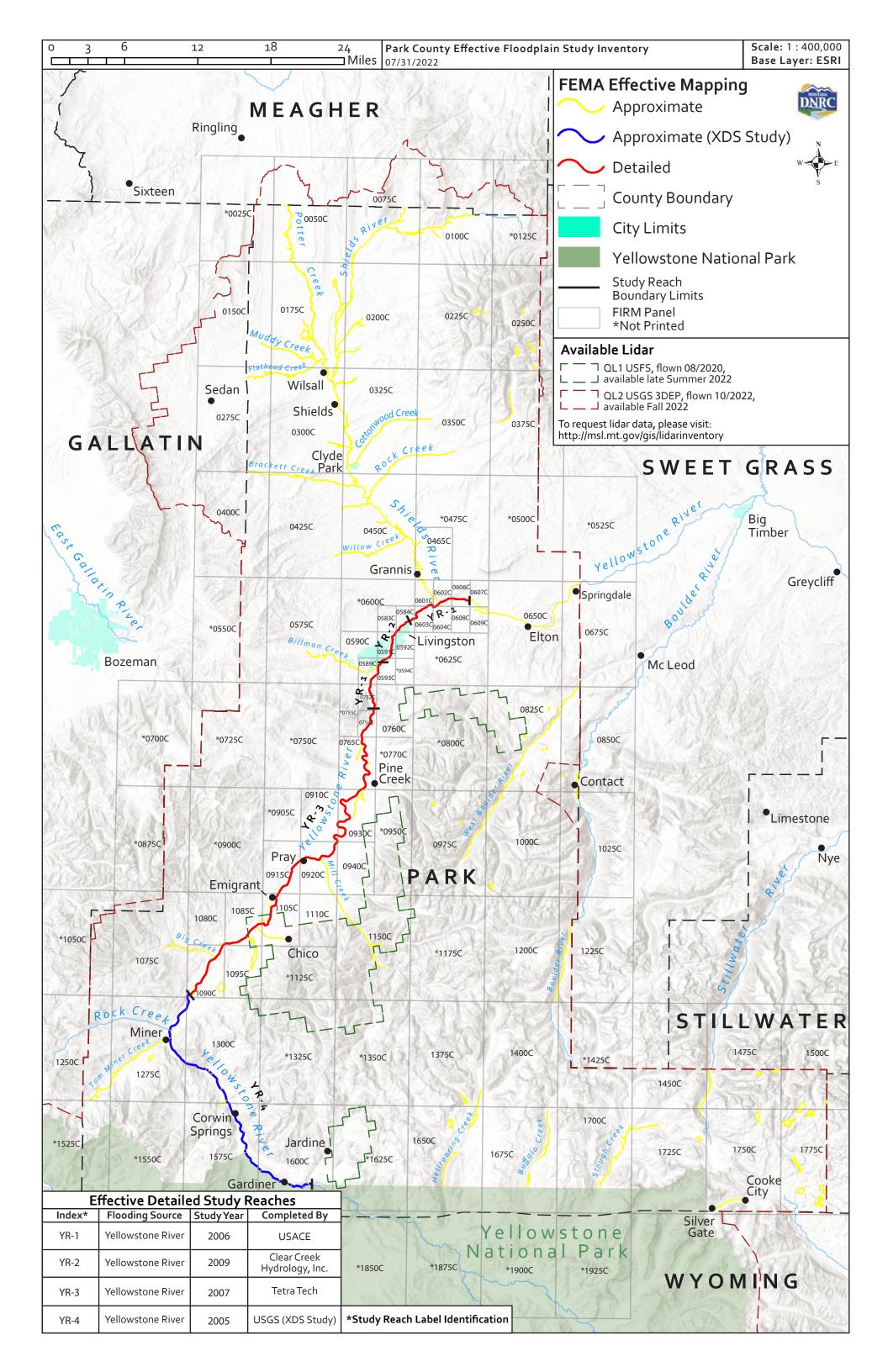
Data Requests: Peri Turk, EI, CFM, DNRC Helena Water Resources Division Office - 406-444-6656, Peri.Turk@mt.gov Permitting Assistance: Sam Johnson, PE, CFM, DNRC Billings Regional Office - 406-247-4423, Sam.Johnson@mt.gov

<u>Acronyms</u>

FIS Flood Insurance Study

HEC-RAS Hydrologic Engineering Center - River Analysis System

USACE U.S. Army Corps of Engineers
USBR U.S. Bureau of Reclamation







# **Park County Effective Floodplain Study Inventory**

|       |                   |               |                    |                            |             |               | Hydraulics                      |               |     |   |
|-------|-------------------|---------------|--------------------|----------------------------|-------------|---------------|---------------------------------|---------------|-----|---|
| Index | Flooding Source   | Study<br>Year | FIS                | Completed By               | Study Type  | Zone          | Hydrology Source (Completed By) | Model Type    |     | Are Study-Specific Shapefiles Available |
| YR-1  | Yellowstone River | 2006          | Park County (2011) | USACE                      | Detailed    | AE w/Floodway |                                 |               |     | Yes                                     |
| YR-2  | Yellowstone River | 2009          | Park County (2011) | Clear Creek Hydrology, Inc | Detailed    | AE w/Floodway | FIS (USACE)                     | HEC-RAS 3.1.3 | Yes | Yes                                     |
| YR-3  | Yellowstone River | 2007          | Park County (2011) | Tetra Tech/Michael Baker   | Detailed    | AE w/Floodway | FIS (USGS)                      | HEC-RAS 3.1.3 | Yes | Yes                                     |
| YR-4  | Yellowstone River | 2005          | Park County (2011) | USGS                       | Approximate | Zone A        | USGS Report (USGS)              | HEC-RAS 3.0   | Yes | Yes                                     |

Data Requests: Peri Turk, EI, CFM, DNRC Helena Water Resources Division Office - 406-444-6656, Peri.Turk@mt.gov Permitting Assistance: Sam Johnson, PE, CFM, DNRC Billings Regional Office - 406-247-4423, Sam.Johnson@mt.gov

### <u>Acronyms</u>

FIS Flood Insurance Study

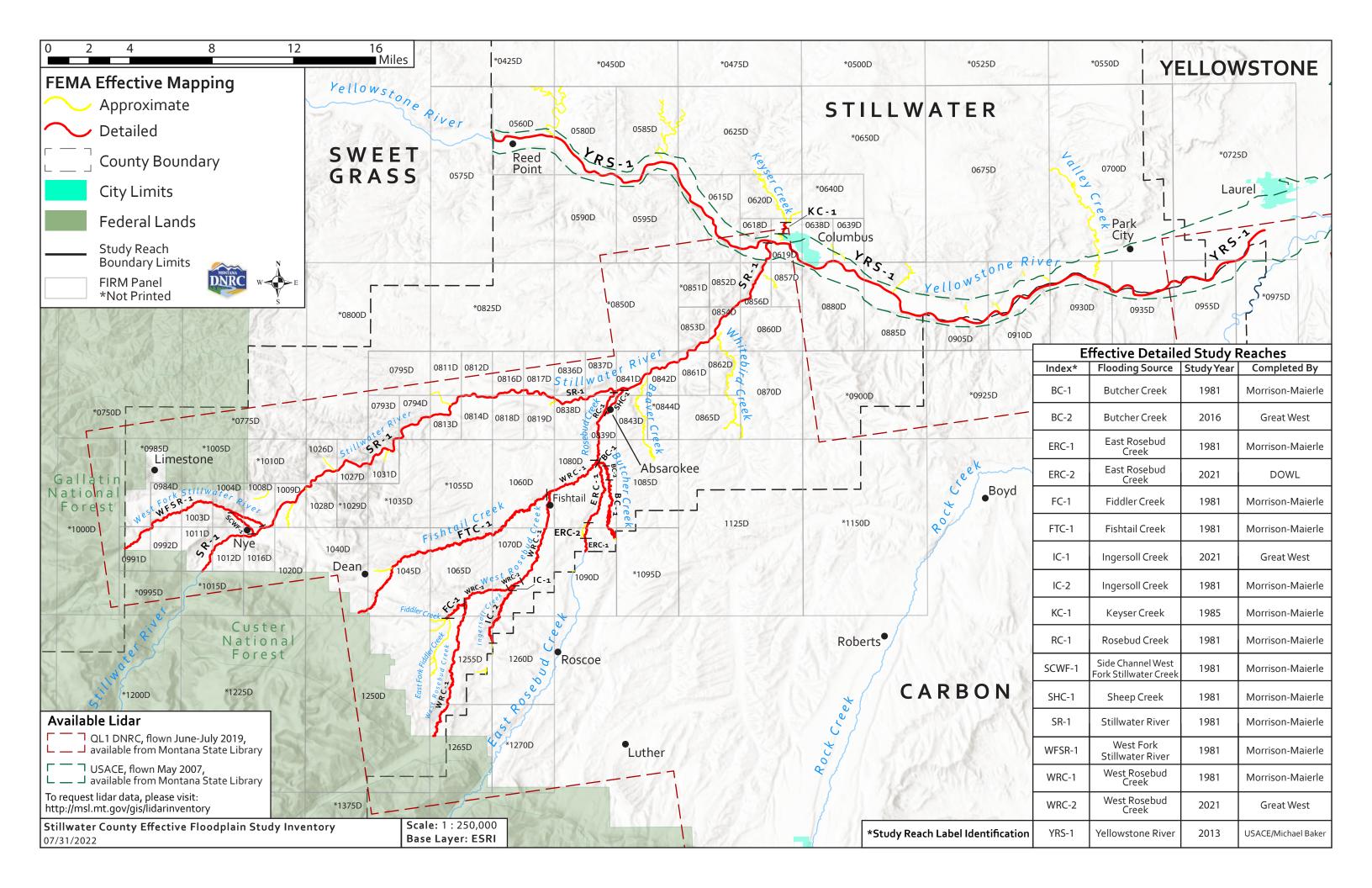
HEC-RAS Hydrologic Engineering Center - River Analysis System

LOMR Letter of Map Revision

TSDN Technical Support DataNotebook
USACE U.S. Army Corps of Engineers

USGS U.S. Geological Survey

XDS Existing Data Study - used when an existing study is adopted as approximate mapping





# **Stillwater County Effective Floodplain Study Inventory**

|        |  |               |                          |                     |               |                  |                                      | Hydraulics                         |               |                                  |   |
|--------|--|---------------|--------------------------|---------------------|---------------|------------------|--------------------------------------|------------------------------------|---------------|----------------------------------|---|
| Index  | Flooding Source                            | Study<br>Year | FIS                      | Completed By        | Study<br>Type | Zone             | Survey Data Available (Completed By) | Hydrology Source<br>(Completed By) | Model Type    | Are Model Run<br>Files Available | Are Study-Specific Shapefiles Available |
| BC-1   | Butcher Creek                              | 1981          | Stillwater County (2015) | Morrison-Maierle    | Detailed      | AE with Floodway | Some Field Notes Available (M-M)     | FIS (M-M & SCS)                    | HEC-2         | As Microfiche Scans              | No                                      |
| BC-2   | Butcher Creek                              | 2016          | LOMR Hydraulic Report    | Great West          | Detailed      | AE with Floodway | AutoCAD Files (Great West)           | FIS (M-M & SCS)                    | HEC-RAS       | Yes                              | Yes                                     |
| ERC-1  | East Rosebud Creek                         | 1981          | Stillwater County (2015) | Morrison-Maierle    | Detailed      | AE with Floodway | Some Field Notes Available (M-M)     | FIS (M-M & SCS)                    | HEC-2         | As Microfiche Scans              | No                                      |
| ERC-2  | East Rosebud Creek                         | 2021          | LOMR Hydraulic Report    | DOWL                | Detailed      | AE with Floodway | AutoCAD Files (DOWL)                 | Hydraulic Report (DOWL)            | HEC-RAS 4.1.0 | Yes                              | Yes                                     |
| FC-1   | Fiddler Creek                              | 1981          | Stillwater County (2015) | Morrison-Maierle    | Detailed      | AE with Floodway | Some Field Notes Available (M-M)     | FIS (M-M & SCS)                    | HEC-2         | As Microfiche Scans              | No                                      |
| FTC-1  | Fishtail Creek                             | 1981          | Stillwater County (2015) | Morrison-Maierle    | Detailed      | AE with Floodway | Some Field Notes Available (M-M)     | FIS (M-M & SCS)                    | HEC-2         | As Microfiche Scans              | No                                      |
| IC-1   | Ingersoll Creek                            | 2021          | LOMR Hydraulic Report    | Great West          | Detailed      | AE with Floodway | Bathy updated in model (Great West)  | Hydraulic Report (Great West)      | HEC-RAS       | Yes                              | Yes                                     |
| IC-2   | Ingersoll Creek                            | 1981          | Stillwater County (2015) | Morrison-Maierle    | Detailed      | AE with Floodway | Some Field Notes Available (M-M)     | FIS (M-M & SCS)                    | HEC-2         | As Microfiche Scans              | No                                      |
| KC-1   | Keyser Creek                               | 1985          | Stillwater County (2015) | Morrison-Maierle    | Detailed      | AE with Floodway | Data Not Available                   | FIS (M-M & SCS)                    | HEC-2*        | No                               | No                                      |
| RC-1   | Rosebud Creek                              | 1981          | Stillwater County (2015) | Morrison-Maierle    | Detailed      | AE with Floodway | Some Field Notes Available (M-M)     | FIS (M-M & SCS)                    | HEC-2         | As Microfiche Scans              | No                                      |
| SCWF-1 | Side Channel West Fork<br>Stillwater River | 1981          | Stillwater County (2015) | Morrison-Maierle    | Detailed      | AE with Floodway | Some Field Notes Available (M-M)     | FIS (M-M & SCS)                    | HEC-2         | As Microfiche Scans              | No                                      |
| SHC-1  | Sheep Creek                                | 1981          | Stillwater County (2015) | Morrison-Maierle    | Detailed      | AE with Floodway | Some Field Notes Available (M-M)     | FIS (M-M & SCS)                    | HEC-2         | As Microfiche Scans              | No                                      |
| SR-1   | Stillwater River                           | 1981          | Stillwater County (2015) | Morrison-Maierle    | Detailed      | AE with Floodway | Some Field Notes Available (M-M)     | FIS (M-M & SCS)                    | HEC-2         | As Microfiche Scans              | No                                      |
| WFSR-1 | West Fork Stillwater River                 | 1981          | Stillwater County (2015) | Morrison-Maierle    | Detailed      | AE with Floodway | Some Field Notes Available (M-M)     | FIS (M-M & SCS)                    | HEC-2         | As Microfiche Scans              | No                                      |
| WRC-1  | West Rosebud Creek                         | 1981          | Stillwater County (2015) | Morrison-Maierle    | Detailed      | AE with Floodway | Some Field Notes Available (M-M)     | FIS (M-M & SCS)                    | HEC-2         | As Microfiche Scans              | No                                      |
| WRC-2  | West Rosebud Creek                         | 2021          | LOMR Hydraulic Report    | Great West          | Detailed      | AE with Floodway | Bathy updated in model (Great West)  | FIS (M-M & SCS)                    | HEC-RAS       | Yes                              | Yes                                     |
| YRS-1  | Yellowstone River                          | 2013          | Stillwater County (2015) | USACE/Michael Baker | Detailed      | AE with Floodway | Survey Data provided in excel        | FIS (USACE/Michael Baker)          | HEC-RAS 4.1.0 | Yes                              | Yes                                     |

<sup>\*</sup>DNRC does not currently have a copy of this model

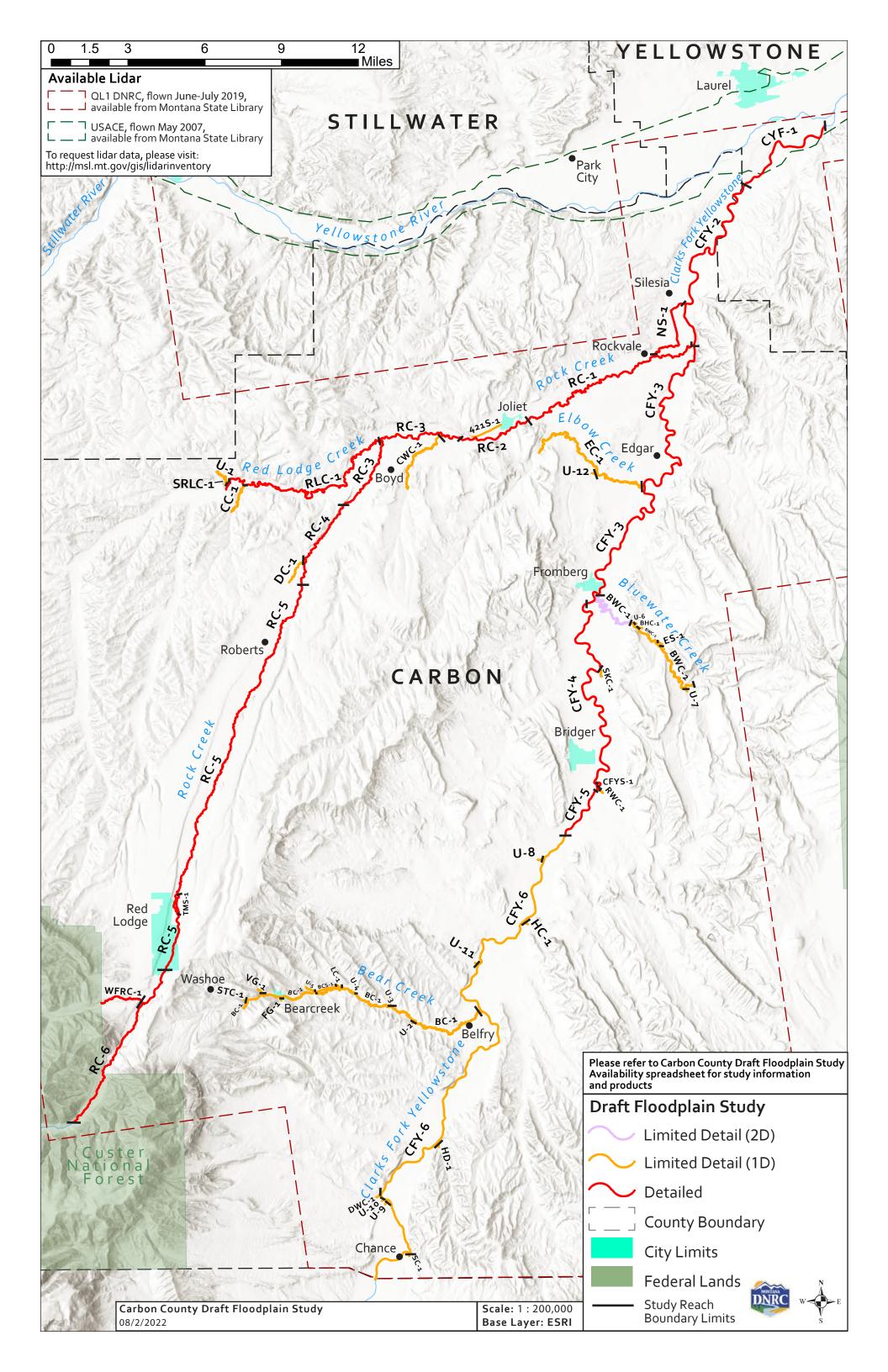
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### <u>Acronyms</u>

FIS Flood Insurance Study

HEC-RAS Hydrologic Engineering Center - River Analysis System

LOMR Letter of Map Revision
M-M Morrison-Maierle, Inc.
SCS Soil Conservation Service
USACE U.S. Army Corps of Engineers





Data Requests: Peri Turk, EI, CFM, DNRC Helena Water Resources Division Office 406-444-6656, Peri.Turk@mt.gov

Permitting Assistance: Sam Johnson, PE, CFM, DNRC Billings Regional Office 406-247-4423, Sam.Johnson@mt.gov

The individual study reaches below are bundleed in two reports as follows. Any requests for just a subset of reaches will result in receiving the entire report, but the reaches are included as individual models.

| Index  | Flooding Source                                      | Study Type          | Zone             |
|--------|--|---------------------|------------------|
|        | eaches - Rock Creek and Tributaries                  | Study Type          | Zone             |
|        | ek and its tributaries are combined in one report be | w Great West        |                  |
| 421S-1 | 421 Split  | Limited Detail      | AE               |
| CC-1   | Cottonwood Creek                                     | Limited Detail      | AE               |
| CWC-1  | Cow Creek  | Limited Detail      | AE               |
| DC-1   | Dry Creek  | Limited Detail      | AE               |
| NS-1   | North Split  | Detailed            | AE with Floodway |
| RC-1   | Rock Creek   | Detailed            | AE with Floodway |
| RC-2   | Rock Creek   | Detailed            | AE with Floodway |
| RC-3   | Rock Creek   | Detailed            | AE with Floodway |
| RC-4   | Rock Creek   | Detailed            | AE with Floodway |
| RC-5   | Rock Creek   | Detailed            | AE with Floodway |
| RC-6   | Rock Creek   | Detailed            | AE with Floodway |
| RLC-1  | Red Lodge Creek                                      | Detailed            | AE with Floodway |
| SRLC-1 | Spillway Channel of Red Lodge Creek                  | Limited Detail      | AE AE            |
| TMS-1  | Two Mile Split                                       | Detailed            | AE with Floodway |
| U-1    | Unnamed Tributary of Red Lodge Creek                 | Limited Detail      | AE AE            |
| WFRC-1 | West Fork Rock Creek                                 | Detailed            | AE with Floodway |
|        | eaches - Clarks Fork Yellowstone River and           |                     | AL WITH HOODWay  |
| _      | s Fork Yellowstone River and its tributaries are co  |                     | O(M)             |
| BC-1   | Bear Creek   | Limited Detail      | AE               |
| BCS-1  | Bear Creek Split                                     | Limited Detail      | AE               |
| BHC-1  | Bachelder Creek                                      | Limited Detail      | AE               |
| BWC-1  | Bluewater Creek                                      | Limited Detail - 2D | AE               |
| BWC-2  | Bluewater Creek                                      | Limited Detail      | AE               |
| CFY-1  | Clarks Fork Yellowstone                              | Detailed            | AE with Floodway |
| CFY-2  | Clarks Fork Yellowstone                              | Detailed            | AE with Floodway |
| CFY-3  | Clarks Fork Yellowstone                              | Detailed            | AE with Floodway |
| CFY-4  | Clarks Fork Yellowstone                              | Detailed            | AE with Floodway |
| CFY-5  | Clarks Fork Yellowstone                              | Detailed            | AE with Floodway |
| CFY-6  | Clarks Fork Yellowstone                              | Limited Detail      | AE With Floodway |
| CFYS-1 | Clarks Fork Yellowstone Split                        | Detailed            | AE with Floodway |
| DWC-1  | Dilworth Creek                                       | Limited Detail      | AE               |
| EC-1   | Elbow Creek  | Limited Detail      | AE               |
| ES-1   | East Split   | Limited Detail      | AE               |
| FG-1   | Foster Gulch   | Limited Detail      | AE               |
| HC-1   | Hunt Creek   | Limited Detail      | AE               |
| HD-1   | Hollenbeck Draw                                      | Limited Detail      | AE               |
| LC-1   | Larkin Coulee  | Limited Detail      | AE               |
| RWC-1  | Rushwater Creek                                      | Limited Detail      | AE               |
| SC-1   | Sand Coulee  | Limited Detail      | AE               |
| SKC-1  | Skunk Creek  | Limited Detail      | AE               |
| STC-1  | Scotch Coulee  | Limited Detail      | AE               |
| U-10   | Unnamed Tributary of Clarks Fork Yellowstone         | Limited Detail      | AE               |
| U-11   | Unnamed Tributary of Clarks Fork Yellowstone         | Limited Detail      | AE               |
| U-12   | Unnamed Tributary of Elbow Creek                     | Limited Detail      | AE               |
| U-2    | Unnamed Tributary of Bear Creek                      | Limited Detail      | AE               |
| U-3    | Unnamed Tributary of Bear Creek                      | Limited Detail      | AE               |
| U-4    | Unnamed Tributary of Bear Creek                      | Limited Detail      | AE               |
| U-5    | Unnamed Tributary of Bear Creek                      | Limited Detail      | AE               |
| U-6    | Unnamed Tributary of Bluewater Creek                 | Limited Detail      | AE               |
| U-7    | Unnamed Tributary of Bluewater Creek                 | Limited Detail      | AE               |
| U-8    | Unnamed Tributary of Clarks Fork Yellowstone         | Limited Detail      | AE               |
| U-9    | Unnamed Tributary of Clarks Fork Yellowstone         | Limited Detail      | AE               |
| VG-1   | Virtue Gulch   | Limited Detail      | AE               |
| ^ O-T  | virtue Guich   | Limited Detail      | IU-              |

All studies use the August 2020 Hydrology Report by Pioneer Technical Services, available upon request

All studies use 2020 structure and bathymetric survey performed by DOWL, available upon request

All studies were performed in 2020-2021

All models are available in HEC-RAS 5.0.7

All studies have associated shapefiles available