



September 27, 2022

My name is Cassie Cohen, she/her pronouns, and I am the executive director of Portland Harbor Community Coalition (PHCC)

I am submitting this written testimony to supplement what testimony I shared virtually at the Planning and Sustainability Commission on September 27, 2022. In 2016, it was determined that floodplain development in Oregon was jeopardizing the existence of listed salmon, steelhead and resident killer whales (that depend on salmon for food).

Four years later, I am disappointed that BPS has eliminated/delayed substantial portions of the work that was contained in the 2021 Discussion Draft of the Floodplain Resilience Plan. The Floodplain Resilience plan as presented to the Planning and Sustainability Commission on September 27th needs to be strengthened and coordinated with other bureaus, agencies and timelines. We do not support it in its current form.

The Portland Floodplain Resilience Plan may be contributing to the delay of bringing necessary environmental and climate justice balance to communities and wildlife in the industrial areas along with the North Reach River Plan, Portland Tree Code, and Willamette Greenway Updates. And unfortunately, it will mean more gaps in important decision-making associated with the Portland Harbor Superfund Process. The remedial design process is occurring for Portland Harbor now absence solid floodplain guidance, leaving responsible parties to fend for themselves.

Despite BPS staffs best of intentions, I have sensed a familiar, all too common, pattern of governance reflected in this planning process:

- Inadequate translation of technical concepts that hold important decisions rendering it near impossible for community members to understand.
- Delayed or eliminated important environmental changes if it goes against industrial or commercial interests,
- Blaming another agency for lack of progress on deliverables and to pass responsibilities on to another agency (in this case FEMA); the City can and should set even higher standards locally and should do so rapidly
- Asking community for feedback but not integrating community recommendations, effectively checking the box rather than developing meaningful working relationships and substantive outputs.

- To continue to harm fish and wildlife and people in perpetuating the policies and zoning codes

Hopefully it's not too late to change this process for the better and to ensure strong alignment with the Endangered Species Act. We also look to the Planning and Sustainability Commission to set a higher standard for inclusive public involvement and co-creation across all planning processes, including the remainder of this one.

1. This plan needs to be strengthened through climate and social justice metrics.
2. Staff should restore Title 24 Amendments to the Floodplain Resilience Plan
3. Consider a 500 year flood metric; EPA already does for Portland Harbor remedial design process in the Willamette River. You can contact Laura Knudsen to learn more and to collaborate: Knudsen.Laura@epa.gov
4. Staff should set transparent, interagency timelines tracking implementation steps with management, Planning and Sustainability Commission and community representatives.
5. Expedite the Economic Opportunities Analysis (EOA) and future phases of the Floodplain Resilience Plan.
6. Find ways around the barriers mentioned – lack of City mitigation bank; lack of North Reach plan; lack of EOA and instead use current City, regional and state climate guidance documents.

Thank you for listening to my verbal testimony as well as taking the time to read and act on my written testimony.

With gratitude,

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