

# Sudha Bajpai

**#332046 | September 20, 2022**

Testimony to **the Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

I wish to have the River Environmental overlay zone removed where it is applied to our house and also, we be allowed a buffer zone of at-least 25Ft around the home as we had prior to this new zone being applied. ....Thank you

Testimony is presented without formatting.

# Briana Knez

**#332048 | September 22, 2022**

Testimony to **the Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

As a young person in their 20s in Portland, I urge you to adopt the full Floodplain Resilience Plan. We need to prioritize habitat preservation to reduce climate change impacts and make sure our generation has a future. Money doesn't matter if we have no natural beauty in this world to live for. Money doesn't matter if we have a planet that we can barely survive on in a few decades. Our generation is scared for our future. Please protect it by protecting nature.

Testimony is presented without formatting.

# Rachel Day

**#332049 | September 22, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

Please see my concerns below as they regard to our floodplains. The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring. The plan does not stop all floodplain development but it does increase protections for floodplains and requires real mitigation when floodplains are developed to compensate for the impacts. This puts the costs where they belong--on developers rather than on the community. The City must adopt the whole plan. Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands. These lands include some of our most important floodplains. We have known for decades that floodplain development puts our communities and environment in harm's way. We have seen city after city in the United States suffer catastrophic floods and we have seen flooding in our own communities. It's time to stop talking about climate resilience and actually take steps to do something about it. The choice is clear: rich, irresponsible developers or safe healthy communities, clean water and salmon.

Testimony is presented without formatting.

# Stephan Nance

**#332050 | September 22, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

I'm a concerned Portlander writing to urge the PSC to adopt the entire Floodplain Resilience Plan. This plan will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring. The plan does not stop all floodplain development but it does increase protections for floodplains and requires real mitigation when floodplains are developed to compensate for the impacts. This puts the costs where they belong--on developers rather than on the community. The City must adopt the whole plan. Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands. These lands include some of our most important floodplains.

Testimony is presented without formatting.

# B. Greene

**#332051 | September 22, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring. The plan does not stop all floodplain development but it does increase protections for floodplains and requires real mitigation when floodplains are developed to compensate for the impacts. This puts the costs where they belong--on developers rather than on the community. The City must adopt the whole plan. Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands. These lands include some of our most important floodplains. We have known for decades that floodplain development puts our communities and environment in harm's way. We have seen city after city in the United States suffer catastrophic floods and we have seen flooding in our own communities. It's time to stop talking about climate resilience and actually take steps to do something about it. The choice is clear: rich, irresponsible developers or safe healthy communities, clean water and salmon.

Testimony is presented without formatting.

# **gary sultany**

## **#332052 | September 22, 2022**

Testimony to **the Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

Dear people, Please do what is right and adopt the comprehensive flood plain plan. It's time we in Portland live up to our image and take action. Climate change will make it harder for all wild life to survive. Flood plain protection is essential for the city and its inhabitants. Of course the corporate interests won't like it, but as city officials isn't it your responsibility to do the obvious right thing? Time is running out, step it up. Gary Sultany

Testimony is presented without formatting.

# Susan Haywood

**#332053 | September 22, 2022**

Testimony to **the Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

Please listen to Audubon's suggestions for Portland's floodplain. Let's continue to be environmental leaders and plan for what nature will surely give us. We do need housing, but nature needs to come first. And nature will dictate the terms. New development must avoid areas that will be flooded; underwater housing is not just expensive to clean up/rebuild, it is also heartbreaking and life-threatening. Let's avoid the worst outcomes of flooding by curtailing development now.

Testimony is presented without formatting.

# Tammy Spencer

**#332054 | September 22, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

Hi There, This Tuesday the Portland Planning and Sustainability Commission has a tremendous opportunity to ensure we have healthy floodplains, which are essential to our community, to fish and wildlife habitats, and to continue tactics to fight climate change. Please listen carefully to the testimony and please move this plan forward in it's entirety. By adopting the entire Floodplain Resilience Plan, we will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. Please be responsible and consistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains by moving this forward. The plan does not stop all floodplain development but it does increase protections for floodplains and requires real mitigation when floodplains are developed to compensate for the impacts. This puts the costs where they belong, which is on developers rather than on the community. The City must adopt the whole plan. Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands. These lands include some of our most important floodplains. We have known for decades that floodplain development puts our communities and environment in harm's way. We have seen city after city in the United States suffer catastrophic floods and we have seen flooding in our own communities. The choice is clear. The City is right on the edge of real progress on this issue, please listen to from the community and please live up to your commitments to climate leadership. Thank You, Tammy Spencer Portland Audubon Past Board Member Portland Audubon New Wildlife Care Center Co-Chair

Testimony is presented without formatting.



# Richard Demarest

**#332055 | September 22, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

From: Richard Demarest Sent: Thursday, September 22, 2022 3:00 PM To: Planning and Sustainability Commission Subject: Proposed Flood Pail Resilience Plan

1. The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. 2. It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring. 3. The plan does not stop all floodplain development but it does increase protections for floodplains and requires real mitigation when floodplains are developed to compensate for the impacts. This puts the costs where they belong--on developers rather than on the community. 4. The City must adopt the whole plan. Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored. 5. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands. These lands include some of our most important flood plains.

Testimony is presented without formatting.

# Dianne Ensign

**#332056 | September 22, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

Please live up to your commitments to climate leadership. I respectfully request that the PSC do the following: The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate chaos and extreme weather events, protect water quality, and provide fish and wildlife habitat. It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring. The plan does not stop all floodplain development but it does increase protections for floodplains and requires real mitigation when floodplains are developed to compensate for the impacts. This puts the costs where they belong--on developers rather than on the community. The City must adopt the whole plan. Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands. These lands include some of our most important floodplains. We have known for decades that floodplain development puts our communities and environment in harm's way. We have seen city after city in the United States suffer catastrophic floods and we have seen flooding in our own communities. It's time to stop talking about climate resilience and actually take steps to do something about it. The choice is clear: rich, irresponsible developers or safe healthy communities, clean water and salmon. Thank you for the opportunity to comment.

Testimony is presented without formatting.

# Kyenne Williams

**#332058 | September 22, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

Please adopt the entire Floodplain Resilience Plan to protect the Portland community from whatever impacts of climate change and extreme weather events possible. Clearly protecting water quality and wildlife habitat is essential for our continued coexistence. I ask this because it is both inconsistent and irresponsible not to adequately protect our floodplains (see Pakistan, Puerto Rico, and Vanport). We need a plan that increases protections for floodplains including serious mitigation with development - and puts the costs where they belong, on developers rather than a vulnerable community. Lastly, the City must adopt the ENTIRE PLAN. This means complete restoration of Title 24 protections; the City must also expedite floodplain protections on all industrial land. Anything less than this puts our communities in harm's way. Let's stop talking about climate resilience and DO something NOW.

Testimony is presented without formatting.

# Debby Patten

**#332059 | September 22, 2022**

Testimony to **the Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

Please stand up to climate chaos and support the Floodplain Resilience Plan. We can no longer push changes to the next generation...we need to take care of our planet now! Thank You,

Testimony is presented without formatting.

**From:** [Planning and Sustainability Commission](#)  
**To:** [Mary Hayden](#)  
**Cc:** [Caudill, Jeff](#)  
**Subject:** RE: Protect Our Floodplains  
**Date:** Thursday, September 22, 2022 3:37:08 PM

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Hello, Mary,

Thank you for your comments about the Floodplains Resilience Project, coming to the Planning and Sustainability Commission for a hearing on Tuesday, September 27.

Please note that all testimony needs to be submitted into the Map App for PSC members to review and consider:

- On <https://www.portlandmaps.com/bps/floodplain/#/map/>, you can review the full proposal.
- On the right side of the page, there is a "TESTIFY" link (white text in a blue box).
- Click that link to enter the required information, including the notes you've shared below.

We appreciate hearing from you.

julie

Julie Ocken  
she/her  
Strategic Projects  
City of Portland Bureau of Planning and Sustainability  
503-307-9261  
1810 SW 5<sup>th</sup> Ave, Suite 710  
Portland, OR 97201  
[www.portland.gov/bps](http://www.portland.gov/bps)

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**From:** Mary Hayden <hayden.mary.k@gmail.com>  
**Sent:** Thursday, September 22, 2022 3:17 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Protect Our Floodplains

Floodplains and wetlands are hands-down one of the greatest assets a city can maintain against climate change. Sure, we know we need to keep carbon out of the atmosphere. But what's the second biggest threat to a stable climate? LOSS of WATER from the landscape. Drainage, clearing, development, .... anything that shunts water into the rivers and oceans leaving the land high and dry exacerbates heat and drought. Our water cycles must be healthy: collecting, absorbing, and SLOWING the flow of water back to the ocean. Otherwise rain evaporated from the ocean just

drenches, floods, and runs quickly back to sea, raising sea levels, unable to be absorbed to nourish cooling trees and vegetation. And it's now known that the presence of healthy forests actually helps rain clouds form above them.

Seventy-five percent of our nation's wetlands are gone. Most floodplains have been changed to tight, fast-drain channels. Please don't contribute to more of the same. A planet in peril can't afford even one more short term profit scheme. We must move in the opposite direction.... Now.

# Mary Hayden

**#332128 | September 22, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

Floodplains and wetlands are hands-down one of the greatest assets a city can maintain against climate change. Sure, we know we need to keep carbon out of the atmosphere. But what's the second biggest threat to a stable climate? LOSS of WATER from the landscape. Drainage, clearing, development, .... anything that shunts water into the rivers and oceans leaving the land high and dry exacerbates heat and drought. Our water cycles must be healthy: collecting, absorbing, and SLOWING the flow of water back to the ocean. Otherwise rain evaporated from the ocean just drenches, floods, and runs quickly back to sea, raising sea levels, unable to be absorbed to nourish cooling trees and vegetation. And it's now known that the presence of healthy forests actually helps rain clouds form above them. Seventy-five percent of our nation's wetlands are gone. Most floodplains have been changed to tight, fast-drain channels. Please don't contribute to more of the same. A planet in peril can't afford even one more short term profit scheme. We must move in the opposite direction.... Now.

Testimony is presented without formatting.

**From:** [Planning and Sustainability Commission](#)  
**To:** [Sebastian Saintis](#)  
**Cc:** [Caudill, Jeff](#)  
**Subject:** RE: Floodplain Protection  
**Date:** Thursday, September 22, 2022 2:53:44 PM

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Hello, Sebastian,

Thank you for your comments about the Floodplains Resilience Project, coming to the Planning and Sustainability Commission for a hearing on Tuesday, September 27.

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We appreciate hearing from you.

julie

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**From:** Sebastian Saintis <[sebastian.saintis@gmail.com](mailto:sebastian.saintis@gmail.com)>  
**Sent:** Thursday, September 22, 2022 2:49 PM  
**To:** Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>  
**Subject:** Floodplain Protection

To whom it may concern,

1. The PSC should adopt the entire Floodplain Resilience Plan which will **protect our communities against the impacts of climate change** and extreme weather events, protect water quality, and provide fish and wildlife habitat.
2. **It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately**



**protect floodplains.** Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring.

3. The plan does not stop all floodplain development but it does **increase protections for floodplains and requires real mitigation** when floodplains are developed to compensate for the impacts. This puts the costs where they belong--on developers rather than on the community.
4. **The City must adopt the whole plan.** Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored.
5. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. **As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands.** These lands include some of our most important floodplains.

We have known for decades that floodplain development puts our communities and environment in harm's way. We have seen city after city in the United States suffer catastrophic floods and we have seen flooding in our own communities. It's time to stop talking about climate resilience and actually take steps to do something about it. The choice is clear: rich, irresponsible developers or safe healthy communities, clean water and salmon.

# Sebastian Saintis

**#332129 | September 22, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

To whom it may concern, 1.The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. 2.It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring. 3.The plan does not stop all floodplain development but it does increase protections for floodplains and requires real mitigation when floodplains are developed to compensate for the impacts. This puts the costs where they belong--on developers rather than on the community. 4.The City must adopt the whole plan. Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored. 5.The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands. These lands include some of our most important floodplains. We have known for decades that floodplain development puts our communities and environment in harm's way. We have seen city after city in the United States suffer catastrophic floods and we have seen flooding in our own communities. It's time to stop talking about climate resilience and actually take steps to do something about it. The choice is clear: rich, irresponsible developers or safe healthy communities, clean water and salmon.

Testimony is presented without formatting.

**From:** [Planning and Sustainability Commission](#)  
**To:** [Susan Saphone](#)  
**Cc:** [Caudill, Jeff](#)  
**Subject:** RE: Flood plain  
**Date:** Thursday, September 22, 2022 1:55:50 PM

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Hello, Susan,

Thank you for your comments about the Floodplains Resilience Project, coming to the Planning and Sustainability Commission for a hearing on Tuesday, September 27.

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We appreciate hearing from you.

julie

Julie Ocken  
she/her  
Strategic Projects  
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**From:** Susan Saphone <susansaphone2@yahoo.com>  
**Sent:** Thursday, September 22, 2022 1:33 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Flood plain

Portland is located on a flood plain, and a plan for the flood plain has been discussed for a decade.

Please consider environmental concerns and listen to Audubon's suggestions.

We DO need housing, but we cannot let development hold up a plan for this vital issue.

The costs of flooding are huge, and housing underwater isn't worth much.

Let's continue to be environmental leaders and address the flood plain asap.

Thank you for your attention,

Susan Haywood  
2136 NW Everett Street  
Portland, OR 97210

# Susan Saphone

**#332130 | September 22, 2022**

Testimony to **the Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

Portland is located on a flood plain, and a plan for the flood plain has been discussed for a decade. Please consider environmental concerns and listen to Audubon's suggestions. We DO need housing, but we cannot let development hold up a plan for this vital issue. The costs of flooding are huge, and housing underwater isn't worth much. Let's continue to be environmental leaders and address the flood plain asap.

Testimony is presented without formatting.

**From:** [Planning and Sustainability Commission](#)  
**To:** [Trine Beach](#)  
**Cc:** [Caudill, Jeff](#)  
**Subject:** RE: Floodplain Resilience Plan  
**Date:** Thursday, September 22, 2022 1:55:03 PM

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Hello, Trine,

Thank you for your comments about the Floodplains Resilience Project, coming to the Planning and Sustainability Commission for a hearing on Tuesday, September 27.

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We appreciate hearing from you.

julie

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**From:** Trine Beach <trinebeach@comcast.net>  
**Sent:** Thursday, September 22, 2022 11:25 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Floodplain Resilience Plan

Dear Portland Planning and Sustainability Commission,

Healthy and intact floodplains are essential for the health and safety of our community, to protect water quality, provide fish and wildlife habitat, and provide resilience in the face of climate change. As more and more cities in the United States suffer catastrophic floods, the importance of floodplain protection looms larger and larger. Yet, too many communities, including Portland, continue to allow irresponsible, unmitigated floodplain development. Developers get rich, our communities get put at direct risk, and our environment is degraded.

Therefore, I strongly believe that the following actions and considerations be taken:

1. The PSC should adopt the entire Floodplain Resilience Plan which will **protect our communities against the impacts of climate change** and extreme weather events, protect water quality, and provide fish and wildlife habitat.
2. **It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains.** Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring.
3. The plan does not stop all floodplain development but it does **increase protections for floodplains and requires real mitigation** when floodplains are developed to compensate for the impacts. This puts the costs where they belong--on developers rather than on the community.
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5. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. **As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands.** These lands include some of our most important floodplains.

Thank you.

Trine Beach

Portland, OR

# Trine Beach

**#332131 | September 22, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

Dear Portland Planning and Sustainability Commission, Healthy and intact floodplains are essential for the health and safety of our community, to protect water quality, provide fish and wildlife habitat, and provide resilience in the face of climate change. As more and more cities in the United States suffer catastrophic floods, the importance of floodplain protection looms larger and larger. Yet, too many communities, including Portland, continue to allow irresponsible, unmitigated floodplain development. Developers get rich, our communities get put at direct risk, and our environment is degraded. Therefore, I strongly believe that the following actions and considerations be taken: 1. The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. 2. It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring. 3. The plan does not stop all floodplain development but it does increase protections for floodplains and requires real mitigation when floodplains are developed to compensate for the impacts. This puts the costs where they belong--on developers rather than on the community. 4. The City must adopt the whole plan. Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored. 5. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands. These lands include some of our most important floodplains.

Testimony is presented without formatting.



**From:** [Planning and Sustainability Commission](#)  
**To:** [Linda Zook](#)  
**Cc:** [Caudill, Jeff](#)  
**Subject:** RE: Portland Needs to Step Up and Protect its Floodplains  
**Date:** Thursday, September 22, 2022 10:18:44 AM

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Hello, Linda,

Thank you for your comments about the Floodplains Resilience Project, coming to the Planning and Sustainability Commission for a hearing on Tuesday, September 27.

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We appreciate hearing from you.

julie

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**From:** Linda Zook <lindazooker@gmail.com>  
**Sent:** Thursday, September 22, 2022 10:16 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Portland Needs to Step Up and Protect its Floodplains

1. The PSC should adopt the entire Floodplain Resilience Plan which will **protect our communities against the impacts of climate change** and extreme weather events, protect water quality, and provide fish and wildlife habitat.
2. **It is irresponsible and entirely inconsistent with the City’s Climate**

**Action Plan and Climate Emergency Work Plan to not adequately protect floodplains.** Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring.

3. The plan does not stop all floodplain development but it does **increase protections for floodplains and requires real mitigation** when floodplains are developed to compensate for the impacts. This puts the costs where they belong--on developers rather than on the community.
4. **The City must adopt the whole plan.** Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored.
5. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. **As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands.** These lands include some of our most important floodplains.

sincerely,

Linda Zook  
18 condolea dr  
lake oswego, or

# Linda Zook

**#332132 | September 22, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

1. The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. 2. It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring. 3. The plan does not stop all floodplain development but it does increase protections for floodplains and requires real mitigation when floodplains are developed to compensate for the impacts. This puts the costs where they belong--on developers rather than on the community. 4. The City must adopt the whole plan. Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored. 5. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands. These lands include some of our most important floodplains.

Testimony is presented without formatting.

**From:** [Planning and Sustainability Commission](#)  
**To:** [Joana Kirchhoff](#)  
**Cc:** [Caudill, Jeff](#)  
**Subject:** RE: Protect the floodplains  
**Date:** Thursday, September 22, 2022 3:43:26 PM

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Hello, Joana,

Thank you for your comments about the Floodplains Resilience Project, coming to the Planning and Sustainability Commission for a hearing on Tuesday, September 27.

Please note that all testimony needs to be submitted into the Map App for PSC members to review and consider:

- On <https://www.portlandmaps.com/bps/floodplain/#/map/>, you can review the full proposal.
- On the right side of the page, there is a "TESTIFY" link (white text in a blue box).
- Click that link to enter the required information, including the notes you've shared below.

We appreciate hearing from you.

julie

Julie Ocken  
she/her  
Strategic Projects  
City of Portland Bureau of Planning and Sustainability  
503-307-9261  
1810 SW 5<sup>th</sup> Ave, Suite 710  
Portland, OR 97201  
[www.portland.gov/bps](http://www.portland.gov/bps)

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**From:** Joana Kirchhoff <[joanakirchhoff@gmail.com](mailto:joanakirchhoff@gmail.com)>  
**Sent:** Thursday, September 22, 2022 3:41 PM  
**To:** Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>  
**Subject:** Protect the floodplains

1. The PSC should adopt the entire Floodplain Resilience Plan which will **protect our communities against the impacts of climate change** and extreme weather events, protect water quality, and provide fish and wildlife habitat.
2. **It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately**

**protect floodplains.** Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring.

Thank you , Joana Kirchhoff 97213

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Do not get lost in a sea of despair," Lewis tweeted almost exactly a year before his death. "Do not become bitter or hostile. Be hopeful, be optimistic. Never, ever be afraid to make some noise and get in good trouble, necessary trouble. We will find a way to make a way out of no way."

# Joana Kirchhoff

**#332133 | September 22, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

1.The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. 2.It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring.

Testimony is presented without formatting.

# Elisa Perry

**#332061 | September 23, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

To the Planning & Sustainability Commission, The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring. The plan does not stop all floodplain development but it does increase protections for floodplains and requires real mitigation when floodplains are developed to compensate for the impacts. This puts the costs where they belong—on developers rather than on the community. The City must adopt the whole plan. Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands. These lands include some of our most important floodplains. We have known for decades that floodplain development puts our communities and environment in harm's way. We have seen city after city in the United States suffer catastrophic floods and we have seen flooding in our own communities. It's time to stop talking about climate resilience and actually take steps to do something about it. The choice is clear: rich, irresponsible developers or safe healthy communities, clean water and salmon. Thank you for considering this critical environmental issue.

Testimony is presented without formatting.

# Judy Roumpf

**#332066 | September 26, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

I strongly encourage you to adopt the draft plan in its entirety, including the original inclusion of Title 24 amendments. While Title 24 may mainly deal with building codes, the provisions related to floodplain fill absolutely belong in this plan. When developers fill a floodplain, they certainly must be required to create an equal amount of new floodplain. Otherwise, the total amount of floodplain decreases, which is the exact opposite of what is needed in our time of climate change. Please be consistent with the City's Climate Action Plan and Climate Emergency Work Plan by adopting the adequate protections to floodplains that were envisioned in the original draft. Real mitigation, with cost borne by developers who would benefit from floodplain fill, must be required and adopted now. Thank you for acting for the benefit our city's and citizens' long term interests.

Testimony is presented without formatting.



To: Portland Bureau of Planning and Sustainability  
Re: Floodplain Resilience Plan  
Date: January 27, 2022

I am writing to voice my strong support for adopting the Floodplain Resilience Plan that now goes before the Planning and Sustainability Commission and the Portland City Council.

As a resident of the Johnson Creek Watershed and longtime volunteer with the Johnson Creek Watershed Council, I am especially interested in the application of the Plan's proposals in the Foster Floodplain, Beggars-Tick, West Lents, and Luther Road natural areas to assure the resilience and good health of natural systems and the residential neighborhoods that share those specific areas. I also believe that the Plan's proposals are critical to the ongoing progress of salmon and habitat restoration projects that so many of my fellow citizens and government agencies have engaged in cooperatively for decades.

Among the proposals that must be adopted: 1) updating the City's floodplain maps to include all areas within the 100-year floodplain and areas inundated in the 1996 floods; 2) the inclusion of all floodplains within the project area that are within an environmental or river overlay zone; 3) increasing mitigation ratios for trees removed and loss of flood storage capacity when floodplains are developed; 4) applying additional habitat requirements within 170 feet of ordinary high water to increase habitat near rivers and streams.

All things considered, it is urgent that a Floodplain Resilience Plan be put in place now to guide all future development in Portland in a manner that respects new standards of environmental sanity at a time of many ecological uncertainties. Accordingly, I also stress that the City of Portland move to assess and update in timely fashion floodplain regulations in portions of the city not covered in the current plan.

Lloyd Vivola  
6035 SE Knapp Street  
Portland, Oregon 97206

# Lloyd Vivola

**#332067 | September 26, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

Dear Commissioners: In December 2020, I watched as winter storm waters neatly coursed from a swollen Johnson Creek and into the calm of the central, wooded basin of the Foster Floodplain. Upstream, these voluminous currents dislodged a steel pedestrian bridge at the Leach Botanical Gardens. Prior to floodplain restoration, this neighborhood in Southeast Portland was plagued by the costly, recurring flooding of homes and businesses. Today, the 68-acre floodplain endures as a living lesson in ecological urban accomplishment. As a resident of the Johnson Creek watershed and long-time volunteer with the Watershed Council, I am writing to urge the Portland PSC to adopt the proposed Floodplain Resilience Plan in its entirety. Climate disruption and unpredictable hydrological events are no longer a matter of speculation and debate; they are happening across the United States and around the world with dire social, fiscal, and environmental consequences. Accordingly, full-spectrum floodplain resilience is a sane, long-overdue commitment, one that partners timely policy-making with the vital role natural systems play toward the goal of enhancing the life of a healthy, sustainable metropolitan area. Portland's world reputation as a vanguard "green" city should direct that we act accordingly with regard to this pressing concern. In particular, I want also to stress that I oppose the removal of Title 24 Amendments from the full plan. Developers must be required to protect small businesses, residential neighborhoods, and wildlife habitat by creating new, effective floodplain areas whenever, wherever, development projects have disturbed or removed current floodplains. Anything less than restoring Title 24 Amendments would undermine the comprehensive strategy of an effective Floodplain Resilience Plan. It would also risk doing future injustice to vulnerable human and non-human communities. Finally, I ask the Commission to move swiftly and address floodplain resilience in areas not covered by the current proposal, notably, the industrial areas and adjacent lands along the Willamette and Columbia Rivers. These riparian and floodplain venues are of significant importance to Portland's natural systems and so should be properly prioritized in the city's environmental policies. Enhancing protection for floodplains in and around industrial zones would mitigate the impact of potentially hazardous flooding. It would also provide an economic hedge against the costly industrial clean-ups that a catastrophic event might cause. Sadly, postponing action in these special interest domains has too often become the weak link of sound environmental policy in Portland. Attached is my comment of January 2022. Thanks for your ongoing effort. And please, restore Title 24 Amendments and adopt the Floodplain Resilience Plan in its entirety. Lloyd Vivola 6035 SE Knapp Street Portland, Oregon 97206

Testimony is presented without formatting.

# Jill Spencer

**#332068 | September 26, 2022**

Testimony to **the Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

I am hopeful that every PSC member is familiar with the Portland Floodplain Resilience Plan, and has the courage to adopt the entire plan to ensure Portland leads with climate leadership. The health of our city and our country depend on your leadership and support of this plan. Jill Spencer

Testimony is presented without formatting.

# michael dowd

**#332069 | September 26, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

Commission Members: I live at 753 S Miles St. Our Miles St/Miles Pl. neighborhood is a small group of about two dozen homes that Steve Duin of the Oregonian described as "the neighborhood the cat dragged in" when we stopped the Sellwood Bridge project from destroying our neighborhood with insane traffic changes. Since I moved here in 2005, there have been MANY proposed changes--regulations, traffic, land use, including a condemnation of our home by the County that was opposed by the Bicycle Transportation Alliance AND far-right-wing commentator Lars Larson--any of which could have massively damaged our neighborhood's values and livability. What every threat to our neighborhood has involved is a lack of understanding of how well-intended changes (almost always to regulations) will impact us. I support the goals of this project, and believe most of my neighbors do, too. But I'm concerned that the regulations as applied to us may be incredibly burdensome and counterproductive to the regulations' goals. In 2019, I met with Jeff Caudill about my concerns during the River South work. Three years later, I have the same concerns now--that the City doesn't have a clear picture of how they will impact us, how burdensome they will be, and how counterproductive they may be. I haven't been able to fully digest the impacts to our home or our neighborhood. What I believe I'm seeing is additional costs and burdens not just to people who want to redevelop their properties, but to people doing smaller renovations or additions, and even things as simple as removing a tree. Our neighborhood already has incredibly complex regulations. I've been involved in several attempts by neighbors to improve their properties. One wanted to replace a derelict garage and add a one-car carport. The goal was to build with flood-resistant materials and raise storage above the flood elevation. We gave up because we would have been required to have THIRTEEN zoning adjustments approved, and PBOT demanded a several-hundred thousand dollar street improvement plan. Another neighbor wanted to add a bay window addition on the river. That would have required a TYPE III, tens-of-thousands-dollars review, and a City Council hearing, and would not have met the requirement for river dependence. The notices we got for this hearing were cryptic (my home and my neighbor's don't appear on the Map App) and so general as to be meaningless to anyone who isn't a land use professional. I'm an architect with four decades experience and several projects in this neighborhood, and I can't yet grasp specifically how the regulations will impact us. I'm asking that you approve the project to move forward, but with a condition that the project staff meet with me and my neighbors to discuss specifically how the new regulations and boundaries will impact us in regard to new construction, additions, remodeling, and maintenance (tree removal, etc.) and then

report back to the Commission, and/or to the next review body. One reason this is critical is that this step has been shortchanged or ignored so often in past regulatory changes that it has thwarted those changes from achieving their goals. As it stands, it is easier (I have specific experience) to rebuild a house or outbuilding after a flood UNDER the flood elevation than to build it correctly ABOVE it. Also the regulations are so complex I've had BDS require Early Assistance meetings not because I and my client didn't understand the regulations, but because BDS didn't. And after the meeting, I had to correct half of BDS's findings, because they still didn't understand the regulations. I've also had to correct BDS interpretations on several recent land use reviews in the neighborhood--to the point BDS checks with me before talking to the applicants. The worst thing is that when the regulations aren't workable, people do things totally outside the system. That happens regularly here. One BDS planner told me she'd had several inquiries about doing projects on Miles Place, but none had proceeded. I had to tell her that several HAD proceeded, they just did everything without reviews or permits (!). Thank you for considering this request to make sure the regulations work for our unique pocket of Willamette-riverfront homes to ensure they will achieve the project's admirable goals.

Testimony is presented without formatting.

# michael dowd

**#332070 | September 26, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

Commission Members: Additional comment to my earlier testimony: I just saw the dozens of comments in favor of adopting the plan. Many people and groups I admire support it. I'm one of a handful of people NOT testifying to fully support it. I want to reiterate that I support the goals, but want to be sure the regulations that impact our Miles St./Miles Pl. neighborhood will not have counterproductive impacts. I believe most people who support the project are NOT stating opposition to making sure the regulations work on a practical level in their specific impacts on our neighborhood's homes, especially when doing that will improve the ability of the project to meet its goals.

Testimony is presented without formatting.

# Kenlynn Hamilton

**#332075 | September 26, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring. The plan does not stop all floodplain development but it does increase protections for floodplains and requires real mitigation when floodplains are developed to compensate for the impacts. This puts the costs where they belong—on developers rather than on the community. The City must adopt the whole plan. Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands. These lands include some of our most important floodplains. We have known for decades that floodplain development puts our communities and environment in harm's way. We have seen city after city in the United States suffer catastrophic floods and we have seen flooding in our own communities. It's time to stop talking about climate resilience and actually take steps to do something about it. The choice is clear: rich, irresponsible developers or safe healthy communities, clean water and salmon. Thank you, Stephen & Kenlynn Hamilton 3940 SW 86th Avenue Portland, OR 97225

Testimony is presented without formatting.



# Chris Dodge

**#332077 | September 27, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

I'm writing because I'm concerned about edits to the Floodplain Protection Plan that's being discussed when the Planning & Sustainability Commission meets this evening. It is long overdue for the floodplain resilience plan to be fully adopted and implemented. We know the impacts that climate change has had on communities across America and, once upon a time, Portland was a city was a thought-leader in tackling environmental issues and creating policies for a sustainable future. I feel strongly that the amendment to title 24 be removed - creating an equal amount of new floodplain nearby is not an acceptable solution and this amendment removes one of the most crucial parts of the plan. Title 24 protections should remain intact. Developers should not be influencing our environmental policies resulting in negative impacts for both the people and wildlife in this city -- it is entirely irresponsible and short sighted to allow them to alter our policies to fit their self-serving demands. Please stand up for Portland and do the right thing. Thank you for your time and consideration.

Testimony is presented without formatting.



**Date: September 26, 2022**

**From: Bob Sallinger, Conservation Director, Audubon Society of Portland**

**To: Portland Planning and Sustainability Commission**

**Re: Floodplain Resilience Plan**

Dear Members of the Portland Planning and Sustainability Commission,

Please accept the following comments from Audubon Society of Portland regarding the Portland Floodplain Resilience Plan. Healthy and intact floodplains are essential for the health and safety of our community, to protect water quality, provide fish and wildlife habitat, and provide resilience in the face of climate change. As more and more cities in the United States suffer catastrophic floods, the importance of floodplain protection looms larger and larger. Portland has its own tragic history of flooding and continues to see significant flood events as recently as spring of 2022. Yet, too many communities, including Portland, continue to allow irresponsible, unmitigated floodplain development. Developers get rich, our communities is put at direct risk, and our environment is degraded.

**Background:**

Cities, including Portland rely on the Federal Emergency Management Agency (“FEMA”) National Flood Insurance Program (“NFIP”) to provide low cost, taxpayer subsidized flood insurance when they allow development in flood prone areas. Without this taxpayer subsidized flood insurance most development would not be possible. In 2009, Audubon Society of Portland sued FEMA (*Audubon Society of Portland et al. v. FEMA*), asserting that FEMA’s management of the NFIP Program was violating the Endangered Species Act’s protections for federal listed salmonids in Oregon. This litigation ultimately resulted in a [Biological Opinion](#) (“BiOp”) issued by the National Marine Fisheries Service in 2016 which concluded that FEMA’s flood insurance program violates the Endangered Species Act by subsidizing development in floodplains that jeopardize the continued existence of salmon, steelhead and Southern Resident Killer Whales

and adversely modifies the designated critical habitat of anadromous fish species in Oregon. NMFS included a list of six reasonable and prudent alternatives (“RPAs”) that FEMA should incorporate into its program in order to ensure compliance with the Endangered Species Act. In order to avoid violating the Endangered Species Act, both FEMA and local jurisdictions that allow development in floodplains must comply with the BiOp.

For the past several years, the City of Portland has been proceeding with a phased approach to updating its floodplain regulations to comply with the BiOp. The City adopted new regulations for the South Reach of the Willamette River in Phase 1 (2020). It has been proceeding with Phase 2 of this process to update floodplain protections for the rest of the City except the North Reach of the Willamette, portions of the Columbia Corridor and Johnson Creek which were assigned to later phases of this process. While Audubon questions the need for phasing and the extended timeframe over which this work is being conducted, we were generally supportive of the Discussion Draft for the current phase which was released in 2021. To be clear, Audubon believes that the entire City could have been done in a single process instead of being spread out over multiple phases and multiple years, but felt that the work that was contained within this phase generally conformed to the terms of the BiOp.

It is therefore deeply disappointing that in the Proposed Draft that is now before the Planning and Sustainability Commission, the BPS has chosen to eliminate/ delay substantial portions of the work that was contained in the 2021 Discussion Draft. The omissions are significant enough that we no longer believe that the plan is anywhere near sufficient to meet the terms of the BiOp and that the City has significant legal exposure under Section 9 of the Endangered Species Act for development projects that it permits to proceed forward in the floodplain. We would further assert that this legal exposure likely extends backwards for any development projects that the City has permitted to proceed since the BiOp was released in 2016. We want to emphasize here that jeopardy decisions under the Endangered Species Act are not common--the fact that the 2016 BiOp determined that floodplain development in Oregon was jeopardizing the existence of listed salmon, steelhead and resident killer whales (that depend on salmon for food) should be taken seriously.

**We urge the Bureau of Planning and Sustainability, in the strongest possible terms, to make the following changes to the the Floodplain Resilience Plan:**

- 1) **Restore Title 24 Amendments to the Floodplain Resilience Plan:** One the most significant elements of the Floodplain Resilience Plan is the inclusion of enhanced requirements for balanced cut and fill. Balanced cut and fill refers to compensatory mitigation that must occur when a floodplain is filed and/or/ built upon, thereby reducing capacity for flood retention and habitat value. BPS has provided two explanations for the removal of Title 24 amendments. Neither are credible.
  - a) First BPS asserts that Title 24 is not under the purview of the Planning and Sustainability Commission and therefore does not belong in the Floodplain Resilience Plan. In fact, the Floodplain Resilience Plan was developed by a multi-bureau team so that it would be comprehensive and not confined to the immediate purview of BPS. Further, many BPS plans contain code amendments that go beyond the immediate purview of BPS. The City of Portland could not function if BPS planning processes were constrained to the degree that staff now appear to suggest is appropriate. The Floodplain Resilience Plan should proceed forward through the PSC and onto Council as a complete, holistic package.
  - b) Second BPS asserts that it would be challenging to do balanced cut and fill mitigation because the City, itself, does not currently have a mitigation bank. This line of argument seems highly specious. The City has known every step of the way along this process that it does not have an mitigation bank and would not have one when this plan moved forward for adoption. Why is this issue coming up at the eleventh hour? Also, while the City, itself, does not have a mitigation bank, there are privately operated mitigation banks along the Lower Willamette that could serve exactly the same function. For those developers who are unable to mitigate on their own property, there are other entirely viable options available. Finally, balance cut and fill is not a new thing in the City of Portland. This plan merely enhances the balanced cut and fill requirements that are already in City code. The City had been doing balance cut and fill, albeit at a substantially lower level, for decades. We agree that the City should, for myriad reasons, create its own mitigation bank. In fact, the City has been discussing this need for more than twenty years. However, the absence of a City owned mitigation is not a credible basis for removal of Title 24 Amendments.

2) **Restore C-zone overlays for floodplains in the Columbia Corridor that are not in Heavy Industrial, General Industrial 2 or General Employment 2 zoning:** The current phase does not cover flood plains located in IH, IG2 or EG2 zones due to a lack of a current Economic Opportunities Analysis required under Goal 9. However, the Discussion Draft of the Floodplain Resilience Plan did include protections for floodplains located on non-industrial lands in the Columbia Corridor, specifically, application of C-zones. The current Review Draft eliminates those protections based on the premise that the City now wants to do the entire Columbia Corridor Plan including floodplain updates as a single process. In other words, BPS is now proposing to intentionally leave identified vulnerable floodplains in the Columbia Corridor (for which it has already completed all analysis and developed code language and maps) for an indefinite and likely extremely extended period of time so that it can consolidate code changes in the Columbia Corridor into a single process. This is inconsistent with past practice; BPS has made other code changes applicable to the Columbia Corridor outside of a comprehensive Columbia Corridor Planning Process. Also, we have very low confidence that the City will follow through anytime in the near future. The EOA is years behind schedule and the Columbia Corridor Planning Process has been talked about for nearly two decades. There is simply no credible basis for the City to delay protecting non-industrial floodplains that have been identified, mapped and for which it already has code language.

3) **Reconsider elimination of Title 33 Protections for developed floodplains:** Protections for floodplains in the South Reach of the Willamette that were adopted by Council in 2020 in Phase 1 included Title 33 protections for developed floodplains. The Discussion Draft for Phase 2 (the current phase) also included Title 33 protections for developed floodplains. BPS now proposes to eliminate Title 33 protections for developed floodplains in Phase 2, and retroactively remove them from developed floodplains that were protected in Phase 1. BPS bases this decision on the argument that these protections provide relatively little environmental benefit but require an onerous review process. While we are potentially open to this modification, we do not believe that BPS has provided enough analysis to support this decision. We would like to see more detailed analysis, especially any data that BPS can provide regarding how this has worked to date in the South Reach. Further, we would urge BPS to make it explicitly

clear that while Title 33 may not apply to developed floodplains, Title 24 balanced cut and fill requirements will be applied. There is no question that expanded development in both the undeveloped and developed floodplain has significant impacts on flood storage capacity.

- 4) **Expedite the Economic Opportunities Analysis (EOA) and future phases of the Floodplain Resilience Plan:** It has now been more than a decade that the City has been using lack of a current EOA as a basis for delaying critically important environmental protections on industrial lands (IH, IG2, EG2). This is particularly troubling since the City updated the EOA in 2016, but then failed to advance long delayed environmental initiatives in a timely manner, allowing the EOA to become outdated again. The current EOA update process is already a couple of years behind schedule and moving at a glacial pace. The list of environmental programs that have been delayed on industrial lands (primarily the North Reach and Columbia Corridor) includes the North Reach River Plan, Portland Tree Code, Willamette Greenway Updates and now, the Portland Floodplain Resilience Plan. The delays are also undermining important decision-making associated with the Portland Harbor Superfund Process. The impacts of these delays have significant implications for the health and safety of our community, for our ability to protect and restore the Willamette River, for imperiled species and for the City to achieve its climate action and climate justice goals. Even with the challenges of recent years, the ongoing delays related to the EOA and the domino effect that this has on other important planning processes is both unacceptable and inexplicable. BPS must expedite an inclusive EOA process and then pivot immediately to advancing other delayed processes, including future phases of the Floodplain Resilience Plan.
  
- 5) **BPS should reevaluate whether tree mitigation required in the Floodplain Resilience Plan is adequate to meet the requirements of the FEMA BiOp:** Appendix 2.8-C of the BiOp (Page 398) contains detailed mitigation requirements to ensure compliance with the BiOp. We would urge the City to include a chart that details how the Floodplain Resilience Plan substantively meets each of these requirements. In particular, we would request that the City look closely at the temporal mitigation that is required for trees and other habitat values. Specifically the BiOp requires that habitat mitigation, including trees, be increased if there is a significant time delay between when trees and other habitat is removed and when new mitigation habitat will achieve the

same functional value. Put more simply, a newly planted tree does not have the same functional value as a mature tree and will not attain the same functional value for years to come. The BiOp requires that these temporal delays be mitigated.

**Conclusion:**

We are deeply disappointed by substantial floodplain protections that have been removed in the current Proposed Draft of the Floodplain Resilience Plan. It is all the more concerning because, based on recent City performance on environmental issues, these delays are likely to be extended and potentially permanent. It is also highly likely that we will see substantial floodplain development during this period that place both the City and developers in direct violation of the Endangered Species Act.

The Floodplain Resilience Plan contains six full pages of existing City plans, policies and declarations created by the City reflecting its commitment to floodplain protection. However words on the page need to translate to action on the ground. Those words will have little meaning if the PSC advances the substantially weakened version of the Floodplain Resilience Plan that is now being presented. We consider this plan to be one of the most significant steps the City can take to create resilience in the face of climate change. We also consider it essential to advancing climate justice and the health and safety of our communities. Finally, it is necessary to comply with the Federal Endangered Species Act. We believe that since the release of the BiOp in 2016, the City has been and, based on the Proposed Draft, is likely to continue to approve both public and private development activities that violate the ESA.

We appreciate your consideration of these comments and look forward to working with the City as this effort progresses.

Respectfully,

A handwritten signature in black ink that reads "Bob Sallinger". The signature is written in a cursive, slightly slanted style.

Bob Sallinger  
Conservation Director  
Audubon Society of Portland





# **Bob Sallinger**

**#332078 | September 27, 2022**

Testimony to **the Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

Please accept the attached comments on the Floodplain Resilience Plan from Portland Audubon

Testimony is presented without formatting.



**City of  
Portland, Oregon**  
**Bureau of Development Services**  
FROM CONCEPT TO CONSTRUCTION

Dan Ryan, Commissioner  
Rebecca Esau, Director  
Phone: (503) 823-7300  
Fax: (503) 823-6983  
TTY: (503) 823-6868  
[www.portland.gov/bds](http://www.portland.gov/bds)

**MEMO**

**Date:** September 27, 2022  
**To:** Planning and Sustainability Commission  
**From:** Kimberly Tallant  
 Bureau of Development Services  
**CC:** Jeff Caudill, BPS  
**Re:** BDS Comments on Flood Resilience Project, Proposed Draft

Thank you for the opportunity to review and comment on the Proposed Draft for the Floodplain Resilience Plan. This project is an important step in the City’s compliance with the FEMA BiOp and will result in better protection and enhancement of the City’s floodplains.

The comments below provide detailed comments on the proposal. We look forward to working with BPS staff to address our concerns and to providing additional feedback as the project develops. Please direct questions about these comments to Stephanie Beckman ([stephanie.beckman@portlandoregon.gov](mailto:stephanie.beckman@portlandoregon.gov)) on my staff.

**General Comments**

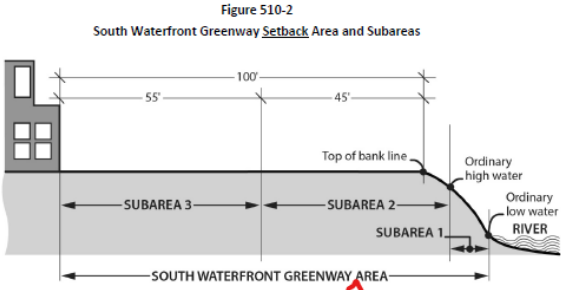
Thank you for working with us to address implementation issues with the Central City Plan District, South Waterfront Subdistrict regulations. The proposed amendments make it more clear when land use reviews are required and provide a new option to meet standards for tree removal that is not currently available in this area.

We have included a number of requests for changes to existing code to address issues that have been identified through implementation. Changes are only requested to code chapters that are already being amended through this project. We appreciate your consideration of these requests that will contribute to a more efficient and effective development review process.

**Detailed Comments**

We offer the following additional detailed comments.

Item No.	Page	Code Section	Comment
1	105	33.475.210.C	Existing Code: Clarification is needed as to whether an applicant can map the top of bank using a site specific survey when the top of bank is shown on Map 475-2.

Item No.	Page	Code Section	Comment
			<p>BPS staff have indicated that the intent is for the applicant to have the ability to provide site specific information, but the code has not been updated to clearly allow that option. The code reads as follows: “Where top of bank is not shown on Map 475-2, top of bank is determined as described in 33.910.030, Definitions, and 33.930.150, Measuring Top of Bank.”</p>
2	105	33.475.220	<p>Existing Code: Can modifications to Landscaping standards be allowed through an Adjustment Review? The prescriptive nature of the code section conflicts with an already highly developed Central City and limits the ability to allow flexibility to address unique situations.</p>
3	107	33.475.405.N	<p>Existing Code: Can the language for exemptions to public street and sidewalk improvements be changed to include freeways, interstates, and ramps? The code definition of street excludes these things making the exemption unusable in these areas. Since the current exemption is limited to developed portions of the ROW only, including other types of improvements would not result in increased impacts to resources.</p>
4	127	Figure 510-2	<p>The term “setback” should be added to the areas of Figure 510-2 noted with red arrow below:</p>  <p>Figure 510-2 South Waterfront Greenway <u>Setback</u> Area and Subareas</p> <p>Greenway Area = from ordinary low water to 100' from top of bank line  Subarea 1 = from ordinary low water to ordinary high water  Subarea 2 = from ordinary high water to 45' in from top of bank line  Subarea 3 = from 45' in from top of bank to 100' in from top of bank line</p>
5	131	33.510.253.E.4.c	<p>The more detailed dredging exemption only covers areas outside of the federal navigation channel. Please indicate what applies to areas within the navigation channel. Note that 33.475 does not restrict dredging in the navigation channel (see 33.475.405.E.1).</p> <p>Also, please clarify how this exemption aligns with 33.10.030.C, which states that dredging is regulated in the Willamette River Central and South Reaches only. Does this include South Waterfront? Note that South</p>

Item No.	Page	Code Section	Comment
			Waterfront is not included on Map 475-1. Are the reaches defined elsewhere?
6	133	33.510.253.E.4.g.(4)	<p>“In addition to the trees listed above, up to 50 inches of non-native, nonnuisance trees.”</p> <p>Revise to clarify up to <u>a combined total diameter</u> of 50 inches</p> <p>We understand that the intent is to exempt this activity from review, but still require the replanting and other requirements in the standards (E.5.i). However, this could be overlooked in implementation because an exemption typically means that none of the regulations apply. It would be helpful to add a clarification to the exemption that indicates that the standards also apply.</p>
7	157	33.631.100.A and B	Please clarify how these criteria are intended to apply to existing development located in the combined flood hazard area. Note that the existing language in 631.100.A.2 refers to “all <b>proposed</b> building areas” which can be interpreted to mean that a lot with an existing building can be created in the flood hazard area, provided lots with new building areas are outside. The amended language in 631.100.B.1 would require each lot to have area outside the flood hazard area for allowed or proposed uses. This language should be more consistent and make it clear if all lots must have buildable area outside of the CFHA.
8	176	33.910	<p>Can information be provided in the commentary about where the Combined Flood Hazard Area mapping will be available and how it will be maintained over time?</p> <p>We assume it will be available in PortlandMaps and in the open data portal. Will BPS maintain this map layer if changes are made to the flood hazard area?</p>
9	201-203	33.610.200, 33.611.200, 33.430.280	Existing Code: Add language to clarify that modifications to lot size and dimensions in single dwelling zones are allowable through Environmental Review. Prior code changes unintentionally removed this allowance, which is an important tool for protecting resources in these zones. The issue was created because 33.610.200 and 33.611.200 state that “Adjustments are prohibited” and

Item No.	Page	Code Section	Comment
			only provides an option for Planned Development review. 33.430.280 states that the “The review body may not consider modifications to standards for which adjustments are prohibited.” A clarification in 33.610 and 33.611 is needed that alternative lot sizes/dimensions may be approved through a PD or an EN modification.

# Stephanie Beckman

**#332079 | September 27, 2022**

Testimony to the **Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

Please see attached comment memo.

Testimony is presented without formatting.

# Alyson Berman

**#332080 | September 27, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

I am writing to ask the City to step up and lead on floodplain protection, not cower before irresponsible developers. I stand by Portland Audubon in asking for the following: - The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. - It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring. - The plan does not stop all floodplain development but it does increase protections for floodplains and requires real mitigation when floodplains are developed to compensate for the impacts. This puts the costs where they belong—on developers rather than on the community. - The City must adopt the whole plan. Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored. - The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands. These lands include some of our most important floodplains.

Testimony is presented without formatting.

# michael dowd

**#332081 | September 27, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

Commission Members, After I submitted testimony yesterday, Jeff Caudill talked to me for a generous amount of time. His explanations of the proposed changes in regulations as they will affect my Miles St./Pl. neighborhood were reassuring. I'd talked to him three years ago during the River South work about several concerns, and it sounds like this project has made diligent efforts to address them. I'm grateful to the project team for that. Earlier, I'd asked that you vote to move this project forward, but require a meeting between staff, and me and my neighbors, to look at how the regulations affect us specifically. I feel reassured now that that's not necessary. However, since the regulations have some significant changes and impacts, I hope there will be some sort of review within the next year to two, with opportunities to tweak any regulations that may not be working as intended. Again, I really appreciate Jeff spending time with me, and the work of the Commission and Planning staff on this.

Testimony is presented without formatting.



# Sara Cichowski

**#332083 | September 27, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

I live at this address. Our house is 100 feet higher and almost 1 acre from where Tyron creek flows. This map should be redrawn without our house included in the flood zone and including the creek in the zone instead. There is NO science, elevation or evidence presented that this version is correct. No person or surveyor visited our house or property to actually look at the creek and it's flow. There is no drainage or other water source near our house besides Tryon creek. I respectfully request removal of our house from the zone and relocation of the zone towards the creek. I also request estimates of the actual amount of rain that would need to fall to fill the space from the creek to our house. Based on the volume of space that would need to be filled I suspect there would need to be over 100 inches of rain in a single day.

Testimony is presented without formatting.











# Malin Friess

**#332084 | September 27, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

My wife (Sara Cichowski) and I are the owners of 2908 SW Collins Court. We have lived at this property for 3.5 years. We should not be considered part of a “flood plain”. Although a small part of Tryon creek runs through our back yard.. there has never been flooding in 3 years. As a matter of fact it would be simply impossible. Look at the attached photos or come visit our property. Our home rests at least 100 feet from the creek. And we are well above (probably 50-60 vertical feet) above the creek. Look at the photos— it’s a steep and long back yard to the creek. It’s a great sledding hill. You will need to redraw your maps. It would be simply impossible for our home to flood. No problems last spring in the wettest spring in 100 years. A simple visit of our property and you would see how silly it would be to include flood insurance. None of the homes on Collins court are at risk for flooding. Our homes are high above the creek. Thanks, Feel free to contact me. Malin Friess 506-508-8903 Malinfriess@yahoo.com

Testimony is presented without formatting.

# Cassie Cohen

**#332157 | September 27, 2022**

Testimony to the **Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

See video

Testimony is presented without formatting.

# Sarah Taylor

**#332158 | September 27, 2022**

Testimony to the **Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

See video

Testimony is presented without formatting.

# Travis Williams

**#332159 | September 27, 2022**

Testimony to the **Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

See video

Testimony is presented without formatting.



# Indigo Namkoon

**#332160 | September 27, 2022**

Testimony to the **Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

See video

Testimony is presented without formatting.

# Renee France

**#332161 | September 27, 2022**

Testimony to the **Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

See video

Testimony is presented without formatting.

# Bob Sallinger

**#332162 | September 27, 2022**

Testimony to the **Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

See video

Testimony is presented without formatting.

# Daniel Rohlf

**#332163 | September 27, 2022**

Testimony to the **Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

See video

Testimony is presented without formatting.



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,

Cassie Cohen, Executive Director  
Portland Harbor Community Coalition  
She/Her/Hers  
cassie@phccoalition.org  
[www.phccoalition.org](http://www.phccoalition.org)

# Cassie Cohen

**#332090 | September 28, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

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, Cassie Cohen, Executive Director Portland Harbor Community Coalition She/Her/Hers cassie@phccoalition.org www.phccoalition.org

Testimony is presented without formatting.



# Darlene Betat

**#332092 | September 28, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

Dear Planning and Sustainability Commission Members: I am writing to ask that PSC adopt the entire Floodplain Resilience Plan to protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. Not adequately protecting our floodplains is inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan and would be irresponsible. Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring. The plan does not stop all floodplain development but it does increase protections for floodplains and requires real mitigation when floodplains are developed to compensate for the impacts. This puts the costs where they belong--on developers rather than on the community. The City must adopt the whole plan. Removal of Title 24 Amendments guts one of the most important parts of the plan. Title 24 protections must be restored. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. As soon as this plan is adopted the City must expedite developing floodplain protections on all industrial lands, which include some of our most important floodplains. As leaders, we look to you to make choices that serve the community, not just developers. Please adopt the entire Floodplain Resilience Plan to ensure safe healthy communities, clean water and salmon.

Sincerely, Darlene Betat

Testimony is presented without formatting.

# Susan Haywood

**#332096 | September 29, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

Floodplain development puts our communities and environment at risk. The PSC should adopt the entire Floodplain Resistance Plan. It is inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. We have known this for decades. Remember the tragic history of Vanport and the flooding we saw last spring. The Plan does not stop all development, but increases protections for floodplains and requires real mitigation. Portland must stand up for the greater good of its people and communities, not the profit of developers. Portland must adopt the whole plan, with the Title 24 amendments restored. And as soon as this plan is adopted, Portland must expedite developing flood plain protection on all industrial lands, which include some of our most important flood plains and bring increased environmental risk. Please protect our communities against the impacts of climate and extreme weather events. Please protect our water quality and provide habitat for fish and wildlife. Please adopt the entire Floodplain Resistance Plan.

Testimony is presented without formatting.



September 29, 2022

Portland Planning & Sustainability Commission  
1900 SW 4<sup>th</sup> Avenue  
Portland, OR 97201

Dear Members of the Portland Planning & Sustainability Commission,

Thank you for your service to the City. As you may or may not know, OHSU has worked for over a decade to redevelop a brownfield in South Waterfront, known as OHSU's Schnitzer Campus. The site has contamination left over from approximately 100 years of heavy industrial uses, and OHSU is slowly turning the site into a vibrant part of the Central City that provides jobs and educational opportunities to thousands of those living in Portland and the wider region.

OHSU chose not to testify at your 9/27 floodplain hearing because city staff had assured us that Title 33 changes will have very little impact on our plans for the Schnitzer Campus. In general, where buildings do not exist today, our Schnitzer Campus is largely a gravel and asphalt brownfield cap, with very little habitat value. Where our ability to redevelop the brownfield might come into question is in changes to Title 24, work we had been assured would take place at a later date.

We have heard that some of those who testified at your recent Planning & Sustainability Commission hearing have asked that Title 24 issues be added to your review. If that comes to pass, we formally request that the public be given the opportunity to testify on Title 24 specifically. We also would request that the Planning & Sustainability Commission's consideration of floodplain issues (Title 33 and Title 24) be delayed to allow:

1. More work on identifying a workable mitigation bank for cut & fill obligations; and
2. For FEMA's regulatory guidance process to catch up with the City's efforts.

The City of Portland has a long track record of encouraging OHSU to redevelop South Waterfront, including redeveloping the Schnitzer Campus brownfield. OHSU has put an incredible amount of resources into being able to grow in the Central City so that we can be accessible to patients and employees and students from all walks of life, especially those who have been historically excluded from quality health care, good jobs and educational opportunities that provide for upward mobility. We look forward to your continued exploration on

**Campus Planning,  
Development & Real Estate**

**Sara Vonde Veld,  
Director**

Mail Code PP22E  
3181 SW Sam Jackson Park Rd.  
Portland, OR 97239-3098

T 503.346.0059  
E [vondevel@ohsu.edu](mailto:vondevel@ohsu.edu)



floodplain issues and would be happy to provide you with any information on our Schnitzer Campus that could help you in your deliberations.

Sincerely,

Sara Vonde Veld

# Sara Vonde Veld

**#332099 | September 29, 2022**

Testimony to the **Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

Please see attached testimony related to the 9/27/22 PSC Hearing

Testimony is presented without formatting.

# Bryan Brock

**#332100 | September 29, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring. The plan does not stop all floodplain development but it does increase protections for floodplains and requires real mitigation when floodplains are developed to compensate for the impacts. This puts the costs where they belong—on developers rather than on the community. It is not acceptable to remove Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby. Removal of this section will render one of the most important parts of the plan ineffective. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands. These lands include some of our most important floodplains.

Testimony is presented without formatting.

# Mickie Harshman

**#332101 | September 30, 2022**

Testimony to the **Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat.

Testimony is presented without formatting.

# Jynx Houston

**#332102 | September 30, 2022**

Testimony to **the Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

Floodplain protection is critically important with the climate crisis raging all over the state & country. Please enact protection asap.

Testimony is presented without formatting.



# Joan Cummings

**#332103 | September 30, 2022**

Testimony to **the Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. The City must adopt the whole plan. Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored.

Testimony is presented without formatting.

# REBECCA BOWEN

**#332104 | September 30, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring. The plan does not stop all floodplain development but it does increase protections for floodplains and requires real mitigation when floodplains are developed to compensate for the impacts. This puts the costs where they belong—on developers rather than on the community. The City must adopt the whole plan. Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored. The City postponed addressing some industrial lands along the river and Columbia River to a later phase of the process. As soon as this plan is adopted it must expedite developing floodplain protections on all industrial lands. These lands include some of our most important floodplains. We have known for decades that floodplain development puts our communities and environment in harm's way. We have seen city after city in the United States suffer catastrophic floods and we have seen flooding in our own communities. It's time to stop talking about climate resilience and actually take steps to do something about it. The choice is clear: rich, irresponsible developers or safe healthy communities, clean water and salmon.

Testimony is presented without formatting.

# April Atwood

**#332105 | September 30, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events. It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately protect floodplains. We have had major flooding as recently as last spring. The plan does not stop all floodplain development, but it does increase protections for floodplains and requires real mitigation from developers. This puts the costs where they belong: on developers rather than the community. The City must adopt the whole plan, including Title 24 Amendments, requiring developers to create new equal amounts of floodplain nearby when they fill floodplains. And the City can not postpone addressing some industrial lands along the river! These lands include some of our most important floodplains. As soon as this plan is adopted, it must expedite developing floodplain protections on all industrial lands!

Testimony is presented without formatting.

# Lisa Lam

**#332106 | September 30, 2022**

Testimony to **the Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

Please adopt the entire floodplain resilience plan. We need to be prospective in our fight against the effects of climate change, not reactive and sorry later. Thanks for listening!

Testimony is presented without formatting.

# Alexis McCauslin

**#332107 | September 30, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

This plan speaks to everything that makes Portland a great city! We have to pass this to continue to support our beautiful land as much as it supports us; and invest into a future where we continue to live with the benefits of our crucial natural resources. Not to mention how significant it is to maintain this bastion of defense against flooding, a demonstrated threat, particularly with the ongoing compounding effects of climate change. City officials understand the importance of environmental protections enough to talk a big game, so now is time to commit and follow through on what you know your constituents want and deserve. ALL of it, without concessions to appease developers and their pockets (removing Title 24 is not an acceptable sacrifice--this is not the place for compromise). Please adopt the entire Floodplain Resilience Plan and put your people and your city over the whims of development and business.

Testimony is presented without formatting.

# Ali Jones

**#332108 | September 30, 2022**

Testimony to the **Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

Please hold fast and the adopt the ENTIRETY of Floodplain Resilience Plan including Title 24 amendments which require preserving the overall amount of floodplain land. Please make Portland a spot of sanity, where the reality of flooding will be dealt with headon and not weakened by concessions to a single segment of the public, developers. Floodplains protect us all; the commission's job is to represent the community and therefore guide city policy that will best serve society. In addition, once this Plan has been adopted-- the committee should expedite extending the plan to all industrial lands.

Testimony is presented without formatting.

# Lorraine McIntyre

**#332109 | September 30, 2022**

Testimony to **the Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

The PSC should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. Title 24 amendments must be restored to the Plan This document has been many years in the planning and we should go ahead and do it now instead of waiting for flooding in this city.

Testimony is presented without formatting.

# paul haggard

## #332110 | September 30, 2022

Testimony to the **Planning and Sustainability Commission** on the **Floodplain Resilience Plan, Proposed Draft**

Floodplains, a commons asset, have been overexploited. This cannot continue nor be exasperated by expansive activity, namely on Ross Island among other sensitive areas. Hopefully we have learned from the problems development has caused.

Testimony is presented without formatting.



# A Buckley

**#332111 | September 30, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

Healthy and intact floodplains are essential for the health and safety of our community, to protect water quality, provide fish and wildlife habitat, and provide resilience in the face of climate change. We have known for decades that floodplain development puts our communities and environment in harm's way. We have seen city after city in the United States suffer catastrophic floods and we have seen flooding in our own communities. 1. The PSC and City should adopt the entire Floodplain Resilience Plan which will protect our communities against the impacts of climate change and extreme weather events, protect water quality, and provide fish and wildlife habitat. 2. Title 24 protections must be restored. Removal of Title 24 Amendments which require that when developers fill floodplains, they also create an equal amount of new floodplain nearby is not acceptable. It guts one of the most important parts of the plan. Title 24 protections must be restored. 3. As soon as this plan is adopted, the City must expedite developing floodplain protections on all industrial lands. These lands include some of our most important floodplains. It's time to stop talking about climate resilience and actually take steps to do something about it. I urge the PSC and the City to live up to their commitments to climate leadership.

Testimony is presented without formatting.

# Eve Grissinger

**#332113 | September 30, 2022**

## **Testimony to the Planning and Sustainability Commission on the Floodplain Resilience Plan, Proposed Draft**

I am a recent transplant to Portland, originally from the southwest coast of Florida. My hometown in Florida, where my mom and sister still reside, was just decimated by Hurricane Ian, with flooding a major aspect of the damage. I am grateful my loved ones are okay, but saddened by so many in my childhood community displaced with destroyed flooded homes. Now, in Portland, I face an opportunity to ensure the protection of the local floodplain. I implore you to adopt the entire Floodplain Resilience Plan to protect our communities from climate and extreme weather disaster. It is irresponsible, not to mention inconsistent with the city's Climate Action and Climate Emergency Work Plans not to do so. Please do not bow to the whims of corporate industry. Please do your duty to this community and its environments to protect it. Adopt the whole plan. Develop floodplain protection on all industrial lands immediately. I have seen firsthand what prioritizing development over climate protection can cause. Please don't leave your community subject to corporate and commercial interest at the sake of safety and climate action, and disaster prevention and mitigation.

Testimony is presented without formatting.

**From:** [Planning and Sustainability Commission](#)  
**To:** [Joana Kirchhoff](#)  
**Cc:** [Caudill, Jeff](#)  
**Subject:** RE: Protect the floodplains  
**Date:** Thursday, September 22, 2022 3:43:26 PM

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Hello, Joana,

Thank you for your comments about the Floodplains Resilience Project, coming to the Planning and Sustainability Commission for a hearing on Tuesday, September 27.

Please note that all testimony needs to be submitted into the Map App for PSC members to review and consider:

- On <https://www.portlandmaps.com/bps/floodplain/#/map/>, you can review the full proposal.
- On the right side of the page, there is a "TESTIFY" link (white text in a blue box).
- Click that link to enter the required information, including the notes you've shared below.

We appreciate hearing from you.

julie

Julie Ocken  
she/her  
Strategic Projects  
City of Portland Bureau of Planning and Sustainability  
503-307-9261  
1810 SW 5<sup>th</sup> Ave, Suite 710  
Portland, OR 97201  
[www.portland.gov/bps](http://www.portland.gov/bps)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

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**From:** Joana Kirchhoff <[joanakirchhoff@gmail.com](mailto:joanakirchhoff@gmail.com)>  
**Sent:** Thursday, September 22, 2022 3:41 PM  
**To:** Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>  
**Subject:** Protect the floodplains

1. The PSC should adopt the entire Floodplain Resilience Plan which will **protect our communities against the impacts of climate change** and extreme weather events, protect water quality, and provide fish and wildlife habitat.
2. **It is irresponsible and entirely inconsistent with the City's Climate Action Plan and Climate Emergency Work Plan to not adequately**

**protect floodplains.** Cities across the United States have been hit with major flood events in recent years and Portland has its own tragic history at Vanport. We have had major flooding as recently as last spring.

Thank you , Joana Kirchhoff 97213

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Do not get lost in a sea of despair," Lewis tweeted almost exactly a year before his death. "Do not become bitter or hostile. Be hopeful, be optimistic. Never, ever be afraid to make some noise and get in good trouble, necessary trouble. We will find a way to make a way out of no way."

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24976	332090	Cassie Cohen	Cassie	Cohen
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24972	332079	Stephanie Beckman	Stephanie	Beckman
24971	332078	Bob Sallinger	Bob	Sallinger
24968	332067	Lloyd Vivola	Lloyd	Vivola
24995	332133	Joana Kirchhoff	Joana	Kirchhoff
24994	332132	Linda Zook	Linda	Zook
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24990	332128	Mary Hayden	Mary	Hayden

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Floodplain Resilience Plan written testimony\_Cassie Cohen\_9.27.22.pdf

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BDS Comments Floodplain Resilience Proposed Draft\_9.27.22.pdf

September 26, 2022 Audubon Society of Portland Comments on Portland Floodplain Resilience Plan (1).pdf

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