



Aug. 30, 2023

Dear Mayor Wheeler and Commissioners,

On behalf of The Intertwine Alliance, I'm writing today to urge Portland City Council to adopt a strong Floodplain Resilience Plan that protects people, property and our environment.

The Intertwine Alliance is the Portland region's nature coalition, advocating for parks, trails, greenspaces and equitable access to nature. Our 80+ partners are public agencies, nonprofit organizations and private businesses. The Intertwine Alliance mobilizes the Portland-Vancouver region in support of healthy and resilient communities. In the future we envision, the benefits of clean air and clean water, access to nature, recreational opportunities, and a clean economy flow equitably to all residents regardless of race or income.

Protecting floodplains is essential to protecting our communities. Cities across the United States are experiencing flood emergencies due to irresponsible floodplain development. In Portland, we are not exempt from this. Case in point, we are currently recognizing the 75th anniversary of the tragic Vanport Floods. Protecting floodplains is an essential part of Portland's climate strategy. Flood events will become more common and more extreme in the coming decades, and here in Portland, we should also expect more flooding as part of the climate crisis.

Taxpayers—residents, businesses, and industries—foot the bill for irresponsible floodplain development. Currently the taxpayer-subsidized National Flood Insurance Program is over \$22 billion in debt. The City must move forward quickly to apply floodplain protections to areas of the City that are not covered by this plan, including the North Reach of the Willamette, Columbia Corridor and Johnson Creek. The City should adopt interim floodplain protections as described by the National Marine Fisheries Service until permanent protections can be put in place.

The Intertwine Alliance works with our colleagues in affordable housing and transportation for maximum benefit to our communities. We recognize houselessness in Portland as a human crisis, and support prioritizing solutions and investments that address root causes. However, this does not have to come at the expense of the environment (causing even more inequities, difficulty and pain for our most vulnerable communities) and the safety of our communities. We urge the City not to cave to developers putting their own profits ahead of the health of our



community and environment. We urge you to remove recent changes to the draft Floodplain Plan that appease powerful development forces:

- The South Waterfront should not be exempted from new floodplain protections.
- Industrial lands should not be exempted from new floodplain protections.
- The two-year delay in implementing the plan should be removed.
- The City should not extend vesting for projects permitted before new regulations go into effect for up to seven years. If current projects do not move forward in a timely manner, new regulations should apply.
- The City should remove loopholes for existing structures in floodplains. When existing structures are substantially modified, they should have to comply with new protections.
- The City should apply the highest floodplain standards to Centennial Mills.

Finally, we urge the City of Portland to do its part to protect endangered species affected by floodplains protection and to comply with the Endangered Species Act. The National Marine Fisheries Service has found that current floodplains protection in Oregon jeopardizes the continued existence of federally listed salmon and Southern Resident killer whales (that depend on salmon for food).

A strong floodplains protection plan will not end all development in floodplains. But it will protect the highest hazard flood areas, ensure that development is adequately mitigated, and ensure that the City complies with the Endangered Species Act. In an age of climate change, and in the face of inequities that persist in our communities, this is necessary and common sense.

Thank you for your time.

Tara Wilkinson, Co-Director
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The Intertwine Alliance

