



Ms. Science Kilner
Regional Environmental Officer
FEMA Region 10
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Bothell, WA 98021
FEMA-R10-ESAcComments@fema.dhs.gov

RE: Scoping Comment regarding FEMA Docket 2023-0007 Environmental Impact Statement (EIS) for Modifications to the National Flood Insurance Program (NFIP) – Endangered Species Act (ESA) Integration in Oregon

To Whom It May Concern:

The Oregon Business Development Department (dba Business Oregon) is the state's economic development agency. Per state statute, the agency is charged with coordinating the development of Oregon's ports and maintenance of Oregon's navigation channels. Business Oregon also operates three funding programs to aid ports in fulfilling their economic development mission.

Oregon's network of 23 public ports plays a critical role in the state's economy. Across the state, ports are the gateways through which Oregon products including agricultural products, timber, and manufactured goods access markets throughout the world. Products from across the globe also arrive at our ports to be distributed throughout Oregon and the United States. In addition to facilitating the movement of goods, ports drive economic growth through a variety of other activities including industrial land development, the operation of airports and railroads, and the maintenance of marine facilities that support the commercial and recreational fishing industries. In sum, 1 in 6 jobs in Oregon are port-related and directly or indirectly tied to cargo, recreation, industrial development, commerce, and other activities at Oregon's ports. This equates to more than 100,000 jobs (including direct, indirect, and induced employment) and more than \$5 billion in annual labor income across the state (2014 figures).

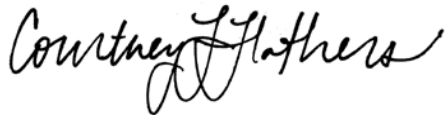
The proposed implementation of the National Flood Insurance Program (NFIP) – Endangered Species Act (ESA) Integration Plan in Oregon has raised significant concerns about the potential impact to port operations and the economic activity they generate in the state and region. Every public port in Oregon is located within the Proposed Action Area.

Regular maintenance dredging of federal navigation channels and port-managed marinas and berthing areas is critical to many port activities and the safe navigation of mariners, including U.S. Coast Guard personnel. Maintenance and improvement of port infrastructure both on land and in water is continuous given the harsh environments in which ports are located. Ongoing efforts by ports to further diversify and grow local and regional economies is likely to require the construction of new infrastructure and other development activities. Ports are currently subject to a complex array of existing federal, state, and local requirements when they complete any of the aforementioned activities, and they work diligently to comply with these regulations. Further restrictions on

development and additional mitigation requirements which may stem from the NFIP-ESA Integration Plan are likely to make port activities even more challenging and expensive, which may have the consequence of halting these activities altogether with potentially devastating economic impacts to ports and the communities they support.

As the state's economic development agency, Business Oregon respectfully requests that FEMA'S EIS scoping process include a thorough examination of the individual and cumulative socioeconomic impacts of the proposed path on impacted parties, including Oregon's 23 public ports. This analysis should include both near- and long-term projected impacts. The NFIP-ESA Integration Plan as currently drafted lacks sufficient detail for communities and local partners, including ports, to be able to ascertain the full scope of potential impacts of implementation. A thorough and transparent vetting of all potential impacts is a critical next step in this process.

Respectfully,

A handwritten signature in black ink that reads "Courtney Flathers". The signature is written in a cursive, flowing style.

Courtney Flathers
Ports Program Policy Coordinator

CC:

Senator Ron Wyden

Senator Jeff Merkley

Representative Earl Blumenauer

Representative Val Hoyle

Representative Suzanne Bonamici

Representative Cliff Bentz

Oregon Public Ports Association

Special Districts Association of Oregon