

COLUMBIA COUNTY

Board of Commissioners Office

Commissioners
Margaret Magruder
Kellie Jo Smith
Casey Garrett

Administration
Jacyn Normine
Kathy Coddington

Communications
Mark Pacheco



ST. HELENS, OR 97051

230 Strand St., Room 338
Direct (503) 397-4322
Fax (503) 366-7243
columbiacountyor.gov

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- **Submitted via FEMA Draft EIS Comment Portal:**
 - fema-r10-or-nfip-esa-integration@fema.dhs.gov

Subject: Comments on FEMA Draft Environmental Impact Statement (EIS) for the National Flood Insurance Program (NFIP) in Oregon

To the FEMA Draft EIS Review Team:

On behalf of **Columbia County, Oregon**, we appreciate the opportunity to submit comments on the **Draft Environmental Impact Statement (DEIS)** regarding the implementation of the **National Flood Insurance Program (NFIP)** in Oregon.

Columbia County is a rural jurisdiction along the lower Columbia River with diverse agricultural, industrial, and residential areas encompassing 658.7 square miles. Our communities depend on accurate FEMA data and reasonable regulatory frameworks to protect residents, support responsible development, and ensure continued eligibility for affordable flood insurance.

After careful review, **Columbia County supports Alternative 1** as the preferred and most appropriate course of action.

Alternative 1 Is the Preferred and Most Feasible Option

Alternative 1 aligns with FEMA's statutory authority to protect people and property and to provide flood insurance. In contrast, **Alternatives 2 and 3** exceed FEMA's statutory and regulatory scope, are not technically or economically feasible, and are inconsistent with the core purposes of the NFIP.

Alternatives 2 and 3 Are Inconsistent with the Purposes of the NFIP

The DEIS itself acknowledges that Alternatives 2 and 3 would produce **significant adverse impacts** to Oregon's communities, including:

- Loss of developable land and reduced property values.
- Decreased housing, commercial, and industrial opportunities.
- Impacts on transportation, public infrastructure, and community safety.

Selecting Alternatives 2 or 3 to benefit fish while harming people and property—including health and safety—would directly contradict the NFIP's purpose and FEMA's enabling legislation.

Alternatives 2 and 3 Are Not Technically Feasible

The DEIS indicates that mitigation under these alternatives would require additional parcels of land at the same floodplain elevation. In Columbia County and throughout Oregon, there is **no evidence that such land is available or compatible with local zoning and comprehensive plans.**

The DEIS also fails to address where the **thousands of tons of removed soil and impervious material** would be legally and safely disposed of. By FEMA's own definition, a proposal is only technically feasible if it can be implemented within existing laws and policies and does not rely on untested or contradictory methods. **Alternatives 2 and 3 fail to meet that standard.**

Alternatives 2 and 3 Are Not Economically Feasible

The DEIS estimates cost increases of up to **28.8%** for new residential and commercial construction, raising the **average annual mortgage cost by approximately \$7,590 per home.** These increases would make housing less attainable and stifle development.

The DEIS also underestimates total financial impacts by excluding:

- The cost of acquiring additional mitigation parcels.
- The cost of hauling and disposal of removed soil and related permits.
- Local government administrative and compliance costs.

The cumulative effect would be **community-wide economic decline**, including reduced tax revenue, job losses, and diminished local investment. Based on FEMA's own economic feasibility criteria, **Alternatives 2 and 3 are not financially viable.**

Alternatives 2 and 3 Exceed FEMA's Statutory and Regulatory Authority

The **National Flood Insurance Act (NFIA)** does not authorize FEMA to establish development criteria that prioritize environmental outcomes over the protection of people and property. FEMA's authority is limited to *encouraging and guiding* floodplain management "where practicable" (42 U.S.C. §4001(e)(2)).

Appendix F Contains Grossly Negligent and Inaccurate Data

Columbia County has reviewed **Appendix F of the DEIS** and finds the data to be **grossly negligent, inaccurate, and inconsistent** with verified county records. Specifically:

- The population, land use, and development data do not align with Columbia County's **GIS mapping, zoning records and lack of data.** Please see attachment A: GIS data summary of acreage and attachment B: Total population data for Cities and unincorporated Columbia County.
- Floodplain development assumptions for the DEIS has been based on **outdated or regionalized estimates** that misrepresent local conditions.

These inaccuracies result in flawed modeling and incorrect conclusions about potential impacts. Columbia County requests that FEMA:

1. **Withdraw and correct Appendix F** using current, verified local datasets; and
2. **Collaborate directly with Columbia County GIS and planning staff** to ensure data accuracy in the final EIS as due to Federal budget cuts there is currently no updated data to the US Census Bureau.

Failure to correct Appendix F will undermine the scientific integrity and credibility of FEMA's analysis.

FEMA Should Not Base NFIP Changes on Outdated Biological Data

The DEIS relies heavily on the **2016 Biological Opinion (BiOp)**, which is now nearly ten years old. The BiOp does not quantify actual floodplain development trends and does not reflect changes in Oregon's land use laws, floodplain management standards, or habitat restoration efforts over the past decade.

Major revisions to the NFIP must be based on **current and scientifically defensible information**, not outdated assumptions.

Conclusion and Request

Columbia County respectfully requests that FEMA:

- Adopt **Alternative 1** as the preferred and lawful option.
- **Correct the grossly inaccurate data in Appendix F** using verified local information; and
- Ensure any future policy changes remain **within FEMA's statutory authority** and are **technically and economically feasible** for Oregon's communities.

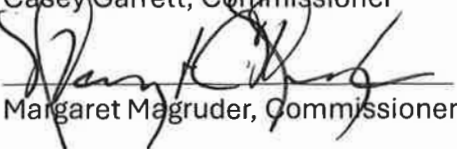
We welcome the opportunity to collaborate with FEMA to ensure data accuracy and balanced policy development that protects both people and natural resources.

Thank you for the opportunity to comment.

Respectfully,


Kellie Jo Smith, Chair


Casey Garrett, Commissioner


Margaret Magruder, Commissioner

Attachments:

- Attachment A: Columbia County GIS data summary showing **acreage** discrepancies with FEMA Appendix F.
- Attachment B: Columbia County **population** discrepancies with FEMA Appendix F.
- Attachment C: FEMA Appendix F with Columbia County **areas of concern highlighted**.

Please note: Due to Federal budget cuts, the US Census Bureau is not updating information.

ATTACHMENT A:

COLUMBIA COUNTY - OREGON

Acreage within the Special Flood Hazard Area

ZONE	ZONE NAME	ACRES
A1	Airport Industrial	0.013
C-2	Marine Commercial	28
C-3	General Commercial	8
CS-1	Community Service - Institutional	51
CS-R	Community Service - Recreation	9900
CS-U	Community Service - Utility	7.9
EC	Existing Commercial	57
FA-80	Forest Agriculture 80	1400
M-1	Heavy Industrial	420
M-2	Light Industrial	42
MFR	Multiple Family Residential	2.5
MHR	Mobile Home Residential	22
PA-80	Primary Agriculture 80	18000
PF-80	Primary Forest 80	8500
R-10	Single Family Residential	150
RC	Rural Community	15
RIPD	Resource Industrial - Planned Development	430
RR-2	Rural Residential - 5	75
RR-5	Rural Residential - 2	2200
SM	Surface Mining	250

Total Acres effected

41558.413

ATTACHMENT B:	
COLUMBIA COUNTY – OREGON - POPULATION	
CITY	POPULATION (2024)
City of Clatskanie	1782
City of Columbia City	1949
City of Prescott	82
City of Rainier	1932
City of Scappoose	8282
City of St. Helens	14460
City of Vernonia	2428
Columbia County - unincorporated	23148
Total Percent effected	Over 10% of community (not 3% per FEMA)

ATTACHMENT C: *See Separate Page On Legal Paper*

