

March 16, 2023

House Committee on Housing and Homelessness
900 Court St. NE - HR, F
Salem, Oregon 97301

Re: HB 3442 - Development of affordable housing on certain lands within 100-year floodplain

Chair Dexter, Vice-Chairs Gamba and Helfrich, and members of the committee:

Multnomah County opposes HB 3442, which would require local governments to allow affordable housing within the 100-year floodplain and potentially in other hazard areas inside the urban growth boundary. While Multnomah County values and recognizes the urgent need for increased affordable housing across the metropolitan area, requiring local governments to approve housing in areas subject to natural hazards conflicts with principles of sound land use planning and management, and raises equity concerns.

Funding permanent and supportive housing is a priority for Multnomah County. However, citing affordable housing developments within a 100-year floodplain would subject our low-income community members to a disproportionate risk from natural hazard impacts than our other communities members. Our affordable housing options should be just as safe and reliable as our other housing options. This would additionally increase the burden on local government's emergency management response if these affordable housing developments experience impacts from a natural disaster and residents need to be rescued or relocated.

Furthermore, the Federal Emergency Management Agency (FEMA) maintains a National Flood Insurance Program (NFIP) which requires participating communities to manage floodplain development and in return allows property owners to purchase subsidized flood insurance. Adopting the bill and requiring affordable housing to be allowed in the regulatory floodplain could inadvertently increase housing costs and potentially disqualify communities from participating in the NFIP, which would increase the economic impact to communities, making flood insurance more expensive and difficult to obtain.

Multnomah County feels strongly that this exception to allowing affordable housing in hazardous areas when currently undefined conditions are met would not align with our equity goals, knowledge of sound land use planning, or our County's mission to preserve harmony between our natural and built environments and keep people safe.

Sincerely,



Lee Girard, Interim Director, Department of Community Services