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September 22, 2025

Federal Emergency Management Agency
National Flood Insurance Program – ESA Integration
Re: Adopt Alternative 1 - Draft Environmental Impact Statement (EIS) and Implementation Plan for NFIP–ESA Integration

Dear FEMA Representatives,

Thank you for the opportunity to comment on FEMA’s updated Draft EIS and Draft Oregon Implementation Plan for NFIP–ESA Integration. The Springfield Area Chamber of Commerce represents more than 800 member businesses and employers across Lane County.

We support policies that provide an adequate supply of housing, commercial, and industrial land, while removing unnecessary barriers to development. Regulatory measures should be reasonable, consistent, and designed to foster business growth without imposing excessive costs or restrictions.

Springfield’s businesses and local government partners need a regulatory framework that allows continued investment in housing, infrastructure, and job creation—without prohibitive costs or lengthy permitting delays. In our city alone, multiple projects are already in the pipeline—including workforce housing, healthcare facilities, light industrial development, and tourism assets—that would be directly and negatively affected by the compliance measures proposed under Alternatives 2 and 3, particularly the “no net loss” standards.

Key Concerns with the “No Net Loss” Standards

- **Impact on Buildable Lands and Economic Growth**

The proposed rules would significantly reduce Springfield’s available buildable lands inventory, particularly in key employment areas such as North Gateway and Glenwood, and could put the city out of compliance with Oregon land-use planning goals.

- **Excessive Costs and Delays**

Mitigation ratios, buffer plantings, and reporting requirements could increase construction costs for homes and businesses by up to 30% and extend permitting timelines. These burdens would undermine affordability, stall job-creating projects, and weaken our community’s ability to meet urgent housing and development needs.

Request to Adopt Alternative 1

We strongly urge FEMA to adopt **Alternative 1**, allowing the NFIP to operate in Oregon as it did prior to the temporary compliance measures implemented last year. Specifically, we ask FEMA to ensure:

- **Clarity and Predictability**
Clear, consistent guidance and technical assistance are essential to prevent project delays and legal uncertainty. Rules should protect community growth goals while offering straightforward, predictable compliance measures.
- **Limited Burdens While Maintaining NFIP Eligibility**
Communities should be required to meet only the minimum standards necessary to retain NFIP eligibility.

In closing, we urge FEMA to move quickly to adopt Alternative 1 and establish a compliance path that minimizes disruption and cost for communities and businesses, avoids duplicative permitting, preserves local decision-making authority, and provides the least burdensome approach to meeting federal requirements—all while enabling critical housing and commercial projects to advance.

Thank you for your consideration.

Warm regards,



Vonnie Mikkelsen
President and CEO
Springfield Area Chamber of Commerce