



April 18, 2010

Mr. Jay Sugnet
City of Portland
1900 SW 4th
Portland, Oregon 97201

Mr. Chris Corich
121 NW Everett Street
Portland, OR 97209-404

Dear Jay and Chris,

Thanks for taking the time to meet last week. I wanted to follow-up with more formal comments from Audubon regarding the Port of Portland's Natural Resource Proposal. In general, the proposal is far superior to the prior proposal and moves much closer to accomplishing Sustainability Guiding Principle #8¹ and Sustainability Goals # 2² and 3³. We commend the Port and the City for the progress to date. However, significant issues remain unresolved and we believe that there are areas where the proposal remains deficient. We urge the Port and the City to allow adequate time to address these concerns before moving to a PAG vote. We would note that Audubon has been pressing both the Port and the

¹ **Avoid, minimize, mitigate and restore impacts to natural resources:** Where natural resources in special habitat areas or protection areas will be adversely impacted, apply the principles of avoid, minimize, mitigate and restore to ensure we fully mitigate for impacts and contribute to the overall net improvement of wildlife habitat quality, quantity and connectivity within the Columbia Slough Watershed.

² Consistent with the Wildlife Hazard Management Plan, PDX Master Plan, and City Land Use Plan, the Port will fully mitigate for impacts and contribute to overall net improvement of wildlife habitat quality, quantity, and connectivity within the Columbia Slough Watershed.

³ Consistent with the Wildlife Hazard Management Plan, the Port will achieve the equivalent of the City of Portland's target of 15% canopy cover on industrial lands, either by on-site tree plantings or support for compensatory offsite tree plantings where onsite planting is not practicable.

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City for more than a year to bring a natural resource proposal forward recognizing that it would take time to work through the details.

We specifically appreciate the Port's commitment to grassland restoration on Government Island, restoration along the Columbia Slough and planting of trees in the Columbia Slough Watershed. While this is not an exact "like for like" mitigation proposal, we believe that the combination is appropriate in this instance to ensure that key natural resources are replaced while also incorporating natural resource restoration projects that will directly benefit the local community which is most impacted by the airport.

We would highlight the following areas as places where the proposal could be clarified or improved:

1. **Mitigation Ratio for Grassland Mitigation on Government Island:** The Port is proposing to mitigate at a ratio of approximately 1:1 for loss of grasslands at 33rd, De-icing. SW Quad and Fuel Farm. We believe that a strong case can be made for a higher mitigation ratio. First, the Port is only mitigating for 50 acres at a time meaning that there may be temporal loss of habitat during this process. Second, since the Port already owns the land where the mitigation will occur, it will not incur the costs of acquiring land typically associated with mitigation above and beyond the actual cost of restoration activities themselves. Third, most mitigation agreements require both a long term maintenance plan and a contingency fee.^{4 5} The contingency fee recognizes that even with long-term maintenance, many mitigation sites are well below 100% successful. We would urge the Port to consider a mitigation ratio of at least 1.5: 1
2. **Availability of Appropriate Mitigation Sites on Government Island:** We would like to better understand where on Government Island the Port is proposing to establish a mitigation site. The entirety of Government Island is already providing wildlife habitat values. While we agree that much of it is degraded, it is important to identify specific areas where the Port believes that restoration could improve grassland habitat without displacing other wildlife functions. Specifically we are interested in ensuring that this agreement truly leads to restoration and improvement rather than habitat conversion. We are also interested in better understanding the feasibility of implementing and maintaining limited acreage of grassland restoration in the middle of what amounts to a sea of invasive species.
3. **Protection of Mitigation Site on Government Island:** The proposal does not identify how the grassland mitigation site on Gov't Island will be protected. Grassland species are particularly vulnerable to disturbance by humans (and dogs). Human use of Government Island has intensified in recent years, all the more so with the installation of a new dock in 2010. In order for the mitigation site to achieve its objectives, human intrusion into

⁴ For example the River Plan Requires a 90% contingency fee plus long term maintenance

⁵ The Willamette Partnership requires a 1.5:1 mitigation ratio to compensate for high levels of failure at many mitigation sites.

the site must be controlled. This is a core element of any mitigation proposal and needs to be clearly described in the agreement. Costs associated with protecting the mitigation site should not diminish the amount of actual mitigation that is required. Audubon recognizes that there may also be educational opportunities facilitated by the mitigation effort. However the primary focus needs to be on ensuring that the site will actually achieve its natural resource objectives. Given the lack of resources currently devoted to managing and patrolling Gov't Island, this presents a significant issue.

4. **Keyhole/ Ikea Wetlands:** the proposal recommends placing piping keyhole in exchange for \$50,000 worth of restoration at Ikea Wetland. We would like to better understand how this number was arrived at and how the Port anticipates the restoration will improve function at Ikea relative to the lost function at Keyhole. Finally, we would like to better understand how this wetland will be maintained over time and the mechanism that will be used to protect it against future development or conversion.
5. **Economy Lot Wetlands:** Our understanding is that the changes being proposed at Economy Lot Wetland will result in habitat conversion rather than habitat improvement. We would like to better understand what changes are being proposed.
6. **HEP/ HEA Process:** It is unclear how the HEP/ HEA process will impact the proposed funding levels included in this proposal.
7. **Tree Planting Proposal:** Our understanding is that tree planting in this proposal will be above and beyond any mitigation that is required for trees that may be cut in the future at the airport. This should be made clear in the proposal. The proposal should also state that tree planting from the PXD Plan will not be used to meet the vegetation requirements of Port Marine Terminals under the River Plan. It would also be helpful to describe to what degree the Port believes this funding will achieve the 15% canopy target.
8. **Columbia Slough Restoration:** Our understanding is that these funds will be used only for actual on the ground restoration rather than administrative or overhead costs. We support this approach, but it should be clarified in the proposal.
9. **Restoration/ Natural Resource Improvement:** The Port's sustainability objectives call for not only mitigation but also net improvement of natural resource function. As currently proposed, the plan would deliver net improvement above and beyond mitigation for impacts of \$223,000 over 25 years. This averages out to \$8,900/ year. We believe that given the scale of airport operations, the Port can do better. We recognize that the Port does many things outside the natural resource arena--however those things are not surrogates for natural resource protection and restoration. We would urge the Port to make a more significant contribution to improvement in the Columbia Slough Watershed. Incorporation of the

comments above into the plan, in particular comment #1 would go a long way towards accomplishing this objective.

Again, we appreciate the work that has been done to date. We believe that the framework is in place to achieve the Port's sustainability objectives. We again urge the City and the Port to take the appropriate time to work through these details.

Thank you for your consideration of these comments.

A handwritten signature in black ink that reads "Bob Sallinger". The signature is written in a cursive, slightly slanted style with a long horizontal stroke at the end.

Bob Sallinger
Conservation Director
Audubon Society of Portland