

## **Comments on draft Joint City/Port Natural Resources Proposed Approach**

Forwarded by Andy Cotugno, PAG Member

Elaine Stewart, April 14, 2010

This document seeks to define a holistic approach for mitigating anticipated habitat degradation and destruction associated with future development at the Portland Airport and nearby areas ("the airport"). In recent years, many agencies and interest groups have gravitated toward larger scale mitigation (often off-site) as an alternative to piecemeal and isolated fragments that fail to achieve mitigation goals. For species such as Western Meadowlark and Streaked Horned Lark that have been observed at the airport, providing a large expanse of habitat at nearby Government Island is an attractive solution.

A quick perusal of Government Island in ArcGIS shows nearly all is owned by Port of Portland. Much of that habitat is unforested and we are told it is degraded grassland. The Port proposes to enhance an equivalent amount of grassland at Government Island for the amount of habitat that will be lost at the airport (250-300 ac). This would be very economical for the Port, since no land acquisition costs would be incurred.

Based on a brief review of the document and 2009 aerial photograph, I have the following comments and recommendations:

1. One of the target species, the Streaked Horned Lark, is both area-sensitive and sensitive to high-relief structures. The present configuration of open areas at Government Island, surrounded by and dotted with trees, is probably not conducive to use by this species. Anecdotal observations at Rivergate indicate that the species seems to be leaving the site as open areas drop below about 75 acres, and that area is more open with fewer trees than Government Island. The Port would need to establish a large, tree-free area for horned larks. Scott Pearson of WDFW and Hannah Anderson of The Nature Conservancy (Washington) have experience with horned larks and their habitat requirements. I recommend that the Port work closely with them and with Bob Altman (American Bird Conservancy) and Randy Moore (Oregon State University) to develop a detailed site plan that will accommodate the birds. Requirements such as sparse vegetation and small-seeded native plants will require active, ongoing management by the Port. Encroachment by weeds can quickly render the habitat unsuitable, and the Port will need to monitor both vegetation and bird activity.
2. The other target species, Western Meadowlark, has different habitat requirements from the horned lark. Meadowlarks require shrubs and other singing perches and adequate grass cover to build their nests. In order to provide sufficient habitat, the Port's proposed acreage of 250-300 should be increased, particularly since the likely habitat blocks are somewhat linear within the island.
3. Other grassland species that could benefit from this mitigation include Northern Harrier and Common Nighthawk. The former species requires a home range of 325 acres or more of open country for hunting. Grassland species are surprisingly area-sensitive and the larger the habitat patch size, the better. The Port owns 600-plus acres of potential high-quality grassland habitat on Government Island, and it

should consider using its savings from lack of acquisition expenses to bolster the area dedicated for these rare and declining grassland species.

4. Boat docks are evident on the north side of Government Island. In addition to their sensitivity to habitat patch size, many grassland species are very sensitive to human disturbance. The Port will need to take measures to restrict public use of the mitigation area. Fencing is an obvious solution but will need to be implemented carefully to avoid creating hunting perches for predators of horned larks (e.g., American Kestrel).
5. The network of trails seen on the 2009 aerial suggests there is livestock grazing on the island. Grazing can be a valuable management tool for grassland management; however, livestock can damage nests and should be kept out of the area or kept to a minimum. I recommend consulting with Pearson, Altman or Anderson regarding this use of the site. Habitat alteration from grazing could reduce or eliminate the habitat value for some species (e.g., by removing vegetation for meadowlark nests).
6. The agreement itself is proposed as an intergovernmental agreement. These are not binding agreements and I recommend an additional, stronger tool. The mention of a Candidate Conservation Agreement (CCA) with USFWS is a good idea. The CCA would include specific provisions for habitat management and monitoring and would be a stronger instrument than an IGA with the city.

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