



CITY OF PORTLAND
ENVIRONMENTAL SERVICES



1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204 ■ Nick Fish, Commissioner ■ Dean Marriott, Director

November 5, 2014

Dear Planning and Sustainability Commission:

Thank you for the opportunity to provide testimony on the Proposed Comprehensive Plan Goals and Policies, Comprehensive Plan Map, Urban Design Framework, and List of Significant Projects. Environmental Services is pleased to support this long-overdue overhaul to the Comprehensive Plan. While parts of the original Comprehensive Plan have been revised since it was first adopted over 33 years ago, it no longer holds together as a coherent document. More importantly, it lacks meaningful guidance on current and emerging issues that affect Portland's future development.

The proposed plan responds to a number of current and emerging opportunities and challenges that the 1981 Comprehensive Plan did not anticipate, including:

Opportunities:

- A cleaner Willamette River, due in large part to Portlanders' investment in the Big Pipes, and a growing interest in recreating on the river, as a result.
- Extensive expertise and increasing use of green infrastructure – including green streets, ecoroofs, and floodplain restoration – as a practical and cost-effective way to manage stormwater and improve sanitary sewer capacity, while also greening Portland neighborhoods.
- Public investment in protecting and restoring sensitive natural resources to protect water quality and natural hydrologic functions, preserve and enhance critical habitats, and provide Portlanders with better access to nature.
- An increase in Portland's urban tree canopy, thanks to public investments and the work of community organizations.

Challenges:

- The costs and complexities related to the cleanup of Portland Harbor, and the impact on Portland's industrial economy and environment.
- The listing of 15 fish species found in Portland as threatened under the Endangered Species Act.
- The impacts of climate change on ecological systems, infrastructure and public health.
- Aging public sewer and stormwater systems with increasing costs for replacement, upgrades, operations and maintenance.
- Evolving federal and state water quality regulations, which will likely result in more stringent water-quality and environmental requirements.

The Comprehensive Plan Update forwards the goals of 2005 Portland Watershed Management Plan, which guide much of Environmental Services' work related to stormwater management and environmental restoration. The Portland Watershed Management Plan calls for improving watershed health within an urban context, based on the following definition:

"A healthy urban watershed has hydrologic, habitat, and water quality conditions suitable to protect human health and maintain ecological functions and processes, including self-sustaining populations of native fish and wildlife species whose natural ranges include the Portland area."

When the City Council adopted the Portland Watershed Management Plan, they called for incorporating its goals and policy guidance into the Comprehensive Plan update. Environmental Services appreciates the work done by Bureau of Planning and Sustainability to include this direction into the Proposed Comprehensive Plan. The resulting documents will significantly improve how City of Portland plans, codes, and investments protect and enhance watershed health, Portlanders' quality of life and our community's long-term prosperity.

Attached please find a summary of comments from Environmental Services, which highlight the proposed plan's strengths that we hope to see carried forward into the Planning and Sustainability Commission's recommendations to City Council, as well as suggestions for further improvements.

As you deliberate about the Proposed Comprehensive Plan, we ask you to give particular attention to the relationship between the economic development and environmental policies. While some people are tempted to consider environmental and economic goals as being in conflict, our work has shown that the opposite is true. Portland's green ethic and urban landscapes (including ecoroofs, green streets and natural areas) attract tourists from all over the world, media-based entrepreneurs and green energy companies. Daimler Trucks North America is investing \$150 million in its new Portland headquarters, while also improving access to the Willamette River. Across town, floodplain restoration in Lents supports local investment and neighborhood revitalization.

Too often, conversations about economic prosperity ignore the fact that some of Portland's biggest economic challenges – like the Portland Harbor Superfund listing and our costs for preventing Combined Sewer Overflows – are the result of previous decisions that were made without consideration of the long-term environmental impacts.

The Comprehensive Plan Update sets important direction for the next 25 years to ensure a high quality of life for future generations. Its proposed policies should guide our plans and investments to make efficient use of existing industrial land, clean up past environmental problems, protect and restore critical habitats for sensitive species, *and* increase public access to the Willamette and Columbia Rivers. By forwarding an integrated approach to planning and implementation, the updated Comprehensive Plan will help avoid environmental problems and promote economic growth.

The Comprehensive Plan Update is guided by a high, yet attainable aspiration – that all Portlanders benefit from good jobs *and* good neighborhoods, access to urban amenities *and* to a healthy environment. With the new Comprehensive Plan guidance, Portland can continue to be a place where prosperity is built on an appreciation for of our key assets – our people, our environment and our commitment to innovation.

As you deliberate about the Proposed Comprehensive Plan update, we hope you find these comments useful. Please let me know if Environmental Services staff can provide any further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'JH', with a long horizontal line extending to the right.

James Hagerman

Interim Director, Bureau of Environmental Services

Integrated Planning and Implementation

Environmental Services supports the emphasis placed on integration in the Goals and Policies Chapter 1: Integrated Planning Principles. It sets a strong direction for all Comprehensive Plan documents, recognizing that all of Portland's physical systems – built and natural – are interrelated and must work together to achieve beneficial outcomes. This represents a fundamental difference from the 1981 Comprehensive Plan and sets a solid foundation for many of the Proposed Comprehensive Plan elements. It also reflects current efforts by Environmental Services to work collaboratively with other City bureaus on issues where we share an interest. For example, we are working with Transportation to implement new, more affordable, Street by Street standards for improving unpaved roads. Parks & Recreation and Environmental Services are formalizing a partnership to manage natural areas to make efficient use of staff expertise and city resources. This kind of coordinated infrastructure planning, investment and implementation will be increasingly important in order to tackle future challenges.

Resiliency and Climate Change

Environmental Services supports the Bureau of Planning and Sustainability's continued leadership in mitigating and preparing for the impacts of Climate Change. The Proposed Comprehensive Plan policies provide much needed guidance aimed at reducing carbon emissions, heat island effects, and impacts of extreme weather. In addition, the policies support improvements to the resilience of natural systems and the ability of infrastructure and development to withstand climate impacts. Many of the plan's policies and actions also address related issues, such as water quality problems in local streams and lack of trees in low-income neighborhoods.

Watershed Health

Environmental Services supports the policies in Chapter 7: Environment and Watershed, with some suggested revisions. The chapter does an excellent job of incorporating the goals of the Portland Watershed Management Plan, which guides much of Environmental Services' work related to water quality, stormwater management and recovery of ESA-listed species. The policies also promote best management practices for green infrastructure, climate change and natural hazard resiliency.

The chapter could be stronger with some relatively minor modifications. The first environmental goal in the Working Draft Part 1 Comprehensive Plan (January 2013) was developed under the specific direction of the Watershed Health and Environment Policy Expert Group. It highlighted the Portland Watershed Management Plan's key goals and provided other underlying reasons for the chapter's policies that follow. Some of these reasons were practical and relevant to City of Portland operations. Others were more personal and were included in response to the strong recommendations of community members of the policy expert group.

Without them, users of the Comprehensive Plan do not have a clear sense of what the policies are intended to achieve.

Later in the chapter, the policies related to improving ecological conditions are difficult to read and their meaning is hard to discern because of the complexity of the language. Several policies unnecessarily restate the intention of *all* Comprehensive Plan policies: to guide City of Portland plans, regulations and investments.

Overall, the Proposed Goals and Policies do a good job of integrating work across policy topics, in order to make good use of public investments. The Working Draft included several “Designing with Nature” policies in a development-related chapter. This highlighted how development, even in urban areas, can (and often is required to) be designed to improve drainage, water quality and tree canopy. Many of these policies now are found in Chapter 7: Environment and Watershed. This misses an opportunity to provide direction about how urban-scale and neighborhood development can promote environmental improvements, even far from natural areas.

To respond to these issues above, we offer the following suggestions:

Suggested revisions:

1. Restore the original goal language from the Working Draft Part 1, January 2013, developed under the specific direction of the Watershed Health and Environment Policy Expert Group, to reflect the rationale they strongly recommended.

Goal 7.B: Healthy watersheds. ~~Ecological and ecosystem functions are maintained and watershed conditions have improved over time.~~ Watersheds in Portland have the hydrologic, water quality and habitat conditions suitable to protect human health, safety, and well-being; protect public and private property; protect ecological functions and ecosystem services; sustain native fish and wildlife; support cultural and spiritual fulfillment; and maintain nature for its intrinsic value.

2. Remove the introductory language from the following policies so their meaning is much clearer:

Policy 7.15 Hydrology. ~~Ensure that plans and investments are consistent with and advance efforts to improve watershed hydrology by achieving more natural flow and Enhanceing the conveyance and storage capacity in rivers, streams, floodplains, wetlands, and groundwater aquifers to restore a more natural watershed hydrology. Minimize impacts from development and associated impervious surfaces, especially in areas with poorly infiltrating soils and limited public stormwater discharge points; and encourage restoration of degraded hydrologic functions, where practical.~~

Policy 7.16 Water quality. ~~Ensure that plans and investments are consistent with and advance efforts to improve water quality in rivers, streams, floodplains, groundwater, and wetlands, including reducing toxics, bacteria, temperature, metals, and sediment pollution. Consider Prevent water quality related health~~

impacts on all Portlanders, especially under-served and under-represented communities.

Remove the similar introductory language for:

- ***Policy 7.17 Habitat and biological communities.***
- ***Policy 7.18 Habitat connectivity.***
- ***Policy 7.19 Urban forest.***

3. Move the following development-related policies from Chapter 7 back into the “Designing with Nature” section of Chapter 4:

- ***Policy 7.23 Low impact development and best practices.*** *Encourage use of low-impact development, habitat-friendly development, bird-friendly design, and green infrastructure, especially for City-owned, managed, or funded facilities.*
- ***Policy 7.24 Impervious surfaces.*** *Limit impervious surfaces to reduce impacts on hydrologic function, air and water quality, urban heat island, habitat connectivity, and tree canopy.*
- ***Policy 7.25 Hazards to wildlife.*** *Encourage building, site, and infrastructure design and practices that provide safe fish and wildlife passage, and reduce or mitigate hazards to birds, bats, and other wildlife.*
- ***Policy 7.26 Access to nature.*** *Promote equitable, safe, and well-designed physical and visual access to nature for all Portlanders, while also protecting significant natural resources, fish, and wildlife. Provide access to major natural features, including:*
 - *Water bodies, such as the Willamette and Columbia rivers, Smith and Bybee Lakes, creeks, streams, and sloughs.*
 - *Major topographic features, such as the West Hills, Mt. Tabor, and the East Buttes.*
 - *Natural areas, such as Forest Park and Oaks Bottom.*

Pattern Areas

Environmental Services supports the plan’s recognition that Portland neighborhoods have evolved into distinctive areas based on topography, culture, natural environment and development history. The concept of “Pattern Areas,” which roughly corresponds to the Portland watershed and stormwater system boundaries, emphasizes the need to tailor land use and infrastructure plans to local conditions. This useful concept moves the Comprehensive Plan past an outdated one-size-fits-all planning philosophy, which, in some cases, has proven to be costly and ineffective. These policies also provide a basis for proposed changes to the Comprehensive Plan Map in areas where steep slopes, poorly infiltrating soils, drainage problems, and/or risks of landslides or flooding make them difficult to develop and serve with infrastructure. We appreciate the careful analysis that Bureau of Planning and Sustainability used to develop these proposals and the intention to better match allowed development

patterns to the realities of local conditions and the feasibility of providing infrastructure services. Their work is consistent with analysis done by Environmental Services early in the Comprehensive Plan process to determine where additional development could potentially contribute to local problems with drainage, streams and/or infrastructure.

Growing and Greening Centers and Corridors

Environmental Services supports the Proposed Comprehensive Plan's emphasis on centers and corridors as places to focus growth, create connections between communities, and provide the greatest concentrations of private goods and public services.

Stormwater from rights of way is a major source of polluted runoff that the City of Portland is obligated to manage and mitigate. Unmanaged impervious areas associated with existing private development also contribute to stormwater challenges. New development or redevelopment in centers and corridors can improve water quality and reduce impacts of impervious areas on our piped systems and local streams by triggering requirements for improvements for stormwater management and tree canopy.

Thoughtful design of public rights of way and private development can also yield more attractive and functional places. Instructive examples include Mississippi Avenue's stormwater courtyards, the Hollywood District's rain gardens, and South Waterfront's ecoroofs, green streets, and parks. Green street curb extensions on Clay Street and Division Street add to the distinctiveness of these areas, while also making busy streets safer for bicyclists and pedestrians to cross. These kinds of multi-purpose improvements can reduce overall costs related to project design and construction, while maximizing public benefits.

In Chapter 3: Urban Form, the policies and Urban Form Diagram further support the greening of corridors by forwarding a key strategy of the Portland Plan – a network of Habitat Corridors, City Greenways and Civic Corridors that work together to connect people to neighborhood destinations and nature, while improving conditions for water and wildlife. The Portland Plan's Guiding Policies calls for Habitat Corridors, City Greenways and Civic Corridors to be the spine of Portland's civic, transportation and green infrastructure systems to enhance public safety, livability and watershed health, and catalyze private investment and support livability. The Comprehensive Plan Update provides an opportunity to create truly distinctive corridors in Portland, through intentional and coordinated planning and implementation.

Greening strategies are especially important for Civic Corridors. Today, many of these busy transit streets are noisy, hot, and difficult (if not dangerous) for pedestrians to cross. Air quality, water quality, and other factors are impacted by these high-traffic streets, affecting human and environmental health, and neighborhood livability.

While the Proposed Comprehensive Plan calls for Civic Corridors to incorporate green infrastructure and be models of ecologically-sensitive design, the policy language does not reflect the Portland Plan's strong emphasis on landscaping and trees to distinguish Civic

Corridors from other streets and to make them healthier, more attractive places for residents, businesses and active transportation.

Because future growth and public investments will be focused along corridors, we suggest the following revisions to ensure that Civic Corridors transform into special places where people want to live, work, shop and gather:

Suggested revisions:

1. Revise the Civic Corridors policy to be consistent with the Portland Plan's Guiding Policies:

Policy 3.38 Integrated land use and mobility. *Enhance Civic Corridors as distinctive places that are models of ecological urban design, with transit-supportive densities of housing and employment, extensive vegetation and tree canopy, and high-quality transit service and pedestrian and bicycle facilities ~~that are models of ecologically-sensitive urban design~~.*

2. As part of early implementation of the Comprehensive Plan, convene the relevant bureaus to ensure that the policies for Civic Corridors, City Greenways and Habitat Corridors are integrated into City plans and specific projects.

Economic Development and Watershed Health

Environmental Services supports the Proposed Comprehensive Plan Goals and Policies regarding the connection between Portland's economic and environmental health:

- ***Goal 6.A: Prosperity.*** *...A strong economy that is keeping up with population growth and attracting resources and talent can:*
 - *... Support a healthy environment...*
- ***Policy 6.45 Clean, safe, and green.*** *Encourage improvements to the cleanliness, safety, and ecological performance of industrial development and freight corridors by facilitation adoption of market feasible new technology and design.*
- ***Policy 6.46 Industrial growth and watershed health.*** *Facilitate concurrent strategies to protect and improve industrial capacity and watershed health in the Portland Harbor and Columbia Corridor areas.*

Environmental Services also supports Chapter 6: Economic Development policies related to brownfield redevelopment:

- ***Policy 6.14 Brownfield redevelopment.*** *Cleanup and redevelop 60 percent of brownfield acreage by 2035.*
- ***Policy 6.39 Industrial brownfield redevelopment.*** *Provide incentives, technical assistance and direct support to overcome financial-feasibility gaps to enable remediation and redevelopment of brownfields for industrial growth.*

During the development of the Proposed Comprehensive Plan, members of the Economic Development Policy Expert Group identified brownfield clean up and redevelopment as a key strategy for helping meet Portland's projected needs for industrial land. Brownfield cleanup provides additional public benefits by reducing the risk of pollution entering Portland's water bodies.

Green Infrastructure and Industrial Development

Chapter 6: Economic Development calls for strict protection of industrial land from potential conversion to other uses. Environmental Services agrees that it is important to prevent the conversion of industrial lands to commercial or residential uses. However, Sub-policy 6.36.b. Prime Industrial Land Retention, calls for limiting the conversion of industrial land through "public land acquisition for non-industrial uses..." This, and related policies, need to be simplified or clarified in order to ensure that these policies are not intended to apply to green infrastructure projects. The following example illustrates the confusion that can arise around Environmental Services' investments in industrial areas:

In the Columbia Corridor, stormwater is discharged into the Columbia Slough, which has significant water quality issues that the City of Portland is required to address. To help manage stormwater runoff and improve water quality in the slough, Environmental Services protects and restores wetlands and other natural areas. For example, the Mason Flats area treats stormwater from 600 acres of development and roadways, while also providing wildlife habitat and other benefits. This critical part of our municipal stormwater infrastructure looks and functions like a natural area or an Open Space use. Stormwater management approaches like this are necessary to address existing runoff and to facilitate new industrial development. Without clarifying the policies, confusion is likely to arise about whether or not a project like Mason Flats is appropriate on industrial land.

This problem could be addressed by simplifying the policies to remove repetition and provide more general direction, consistent with policies found in other chapters. For example, Policies 6.50: Public facilities and land acquisition, and 7.8: Land acquisition priorities and coordination, both relate to how the City of Portland manages its acquisition programs in industrial areas, yet there are already several policies and sub-policies about how to protect industrial lands through planning processes.

Suggested revisions:

1. Simplify the policies regarding retention of industrial land so they focus on the desired outcome – maximizing use of existing land and minimizing loss of land to other uses:

Policy 6.36 Prime industrial land retention. *Protect the multimodal freight-hub industrial districts at the Portland Harbor, Columbia Corridor, and Brooklyn Yard as prime industrial land (see Figure 6-1) that is prioritized for long-term retention.;*

~~6.35.a. Strictly limit quasi-judicial Comprehensive Plan Map amendments that convert prime industrial land and consider the potential for amendments to otherwise diminish the economic competitiveness or viability of prime industrial land.~~

~~6.36.b. Limit conversion of prime industrial land through land use plans, regulations, or public land acquisition for non-industrial uses, especially land that can be used by river-dependent and river-related industrial uses.~~

~~6.36.d. Strive to offset the reduction of development capacity as needed, with additional prime industrial capacity that includes consideration of comparable site characteristics.~~

2. Add a policy to Chapter 8: Public Facilities that promotes coordination between bureaus regarding public land acquisition to ensure consistency with City goals and policies and to make effective use of public resources.

3. Delete overlapping policies 6.50 and 7.8.

~~**Policy 6.50 Public facilities and land acquisition.** Limit the use of prime industrial land for parks or other non-industrial public facilities.~~

~~**Policy 7.8 Land acquisition priorities and coordination.** Maintain a prioritized list of natural resource types, target areas, or properties desirable for public acquisition to support long-term natural resource protection, and establish a process for coordinating acquisition with other programs including strategies to maintain employment land capacity, programs to protect water quality, and programs to reduce exposure to flooding hazards.~~

4. As part of Bureau of Planning and Sustainability's implementation of the Comprehensive Plan Update, consider revisions to the Zoning Code that recognize the public utility function of stormwater management facilities, including green infrastructure facilities.
5. Because the Willamette and Columbia Rivers provide critical habitat for ESA-listed salmonids, migratory birds and other sensitive species, industrial land retention policies should work in tandem with environmental policies that call for protecting and enhancing habitat for native fish and wildlife.
6. Simplify Policy 6.17 regarding regulatory climate so that it focuses on how development review process should work, rather than prescribing specific actions. As worded, sub-policies "b" and "c" describe current development review processes and sub-policy "e" could give the incorrect impression that the City considers its regulatory obligations for clean water and the ESA to be less important than our economic development goals.

Policy 6.17 Regulatory climate. *Provide clear, fair, timely, cost-proportionate, and coordinated development review processes. Improve development review processes and regulations to encourage predictability and support local and equitable employment growth and encourage business retention, including:*

~~**6.17.a.** Assess and monitor cumulative regulatory costs to ensure that Portland is financially competitive with other comparable cities.~~

~~**6.17.b.** Promote certainty for new development through appropriate allowed uses and "clear and objective" standards to permit typical development types without a discretionary review.~~

~~**6.17.c.** Allow discretionary review as a way to facilitate flexible and innovative approaches to meet requirements.~~

~~**6.17.d.** Design and monitor development review processes to avoid unnecessary delays.~~

~~**6.17.e.** Promote cost effective compliance with federal and state mandates, productive intergovernmental coordination, and avoid duplicative procedures when City policies can be achieved through other means.~~

Public Access to the Willamette River

Environmental Services supports policies that promote increased public access to the Willamette River. With the completion of the construction of the Combined Sewer Overflow Controls (the Big Pipes), a major source of pollution is reduced and Portlanders have a greater interest in boating, swimming and other water-based recreation. During the Portland Plan and Comprehensive Plan public outreach, Portlanders consistently asked for more river access. Environmental Services supports the policies cited below to provide access to the rivers. While we recognize the need to consider public safety, marine-dependent industry, and habitat restoration, public access within each of the Willamette River's main reaches should also be a priority of the Comprehensive Plan.

Suggested revision:

Policy 3.60 Recreation. *Improve conditions along and within the Willamette and Columbia rivers for a diverse mix of recreational users and activities. Designate and invest in strategically-located sites along the length of Portland's riverfronts for passive or active recreational activities that are compatible with nearby land uses, historically and culturally important sites, and significant habitat, fish, and wildlife.*

Retain:

Policy 7.26 Access to nature. *Promote equitable, safe, and well-designed physical and visual access to nature for all Portlanders, while also protecting significant natural resources, fish, and wildlife. Provide access to major natural features, including:*

- *Water bodies, such as the Willamette and Columbia rivers, Smith and Bybee Lakes, creeks, streams, and sloughs.*
- *Major topographic features, such as the West Hills, Mt. Tabor, and the East Buttes.*
- *Natural areas, such as Forest Park and Oaks Bottom.*

Comment:

Economic Development Policy 6.37 supports the important role of the riverfront for economic purposes. However, it should not preclude some public access to the river – visual and physical access – at appropriate locations within the industrial waterfront.

Policy 6.37 Harbor access lands. *Limit use of harbor access lands to river- or rail dependent or related industrial land uses due to the unique and necessary infrastructure and site characteristics of harbor access lands for river dependent industrial uses.*

West Hayden Island

The Proposed Comprehensive Plan will guide the development of West Hayden Island, if it is annexed into the City of Portland. As such, it must set clear direction for improving both ecological and economic conditions. Considerable analysis and public deliberation informed the Planning and Sustainability Commission's recommendations to City Council in August 2013 about the area's potential annexation. Unfortunately, the proposed Comprehensive Plan Map and Policies do not reflect the intent of these recommendations.

Suggested revisions:

1. Add policy language to reflect that development of the island should result in improved ecological conditions compared to those that currently exist.

Policy 6.41 West Hayden Island. *Provide for the future annexation of West Hayden Island for a combination of open space and deep water marine industrial uses with supplemental requirements in a plan district or other implementation agreement that ensures mitigation of impacts and provision of public benefits. The annexation ordinance, future zoning, plan districts, and intergovernmental agreements will be used to:*

- *Allow no more than 300 acres for future deep water marine terminal and infrastructure development.*

- *Permanently protect and enhance at least 500 acres as open space, to be managed primarily for the benefit of the regional ecosystem.*
 - *Achieve a net ecological improvement over 2012 conditions (as detailed in the “West Hayden Island Natural Resource Inventory” and the “West Hayden Island Forest Mitigation Framework”), including floodplain-associated habitats and habitats for conservation priority species.*
2. Revise the Proposed Comprehensive Plan Map to show the placement of the Employment and Open Space designations, consistent with the Planning and Sustainability Commission’s Recommended Draft West Hayden Island Plan (August 2013).
 3. Provide the following information in the Commentary for the 2035 Comprehensive Plan – Proposed Draft, to clarify the legislative intent behind these proposals:

Policy 6.41 provides direction intended to reflect the City Council Resolution 36805 on West Hayden Island (July 2010) and the Planning and Sustainability Commission Recommended Draft West Hayden Island Plan (August 2013).

The sub-policy specifies improvements to “floodplain-associated habitats and habitats for conservation priority species” to clarify that ecological improvements should enhance functions that the island currently provides, and that any potential alterations to the floodplain do not result in a loss of floodplain functions.

A net gain means full replacement of all lost floodplain acreage, associated and supported floodplain habitats, ecological functions, and habitats for conservation priority species. Emphasis should be on at least full replacement of acreages with additional consideration of temporal loss. Once full and complete replacement is achieved, any mitigation package would include additional efforts that produce a “net gain.”

For more information about the ecological conditions of the site and opportunities for mitigating and enhancing ecological functions on West Hayden Island, see the “West Hayden Island Natural Resource Inventory” and the “West Hayden Island Forest Mitigation Framework,” both completed in 2012.