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Sent: Tuesday, March 26, 2013 4:47 PM
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mikehouck@urbangreenspaces.org; Katherine@gbdarchitects.com; Wood, Sandra; Zehnder, Joe;
Anderson, Susan; Planning and Sustainability Commission
Cc: Alpert, Josh; Rosen, Mike; Lovell, Kaitlin; Bacchieri, Jane; Howard, Patti
Subject: Mitigation Costs

Dear Members of the Portland Planning and Sustainability Commission,

Eric Engstrom testified earlier that one strategy to reduce the costs of mitigation would be to eliminate some of the offsite mitigation because it is proportionately more expensive than doing mitigation on West Hayden Island. Please note that one of the major concerns raised by conservation groups and natural resource agencies was the Port of Portland's insistence that mitigation be done offsite so that WHI could be used to address Superfund liability. Under any normal mitigation scenario, impacts on WHI would be mitigated on WHI to the maximum extent possible. It is the Port's own insistence that mitigation be done offsite that is driving up the costs that Eric is now referencing. This includes not only the increased direct costs associated with mitigating offsite but also a \$3 million fee that the Port will pay to itself to do mitigation on Government Island. The way to bring down costs is to maximize the amount of mitigation that is done on WHI. To the degree that the Port precludes this opportunity, this should not then be used as a basis for reducing the mitigation requirements.

Respectfully,

Bob Sallinger

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