

**From:** Shani Kleinhaus <shani@scvas.org>  
**Sent:** Wednesday, February 15, 2023 9:39 AM  
**To:** Parks and Recreation Commission  
**Cc:** Ruebusch, Brady; Matthew Dodder; Sylvia, Brenda; Marchant, John; Silja Paymer; , City Clerk; Bruce England  
**Subject:** Item 5.3 Shoreline Wildlife Management Plan  
**Attachments:** GSMV and SCVAS comments on SWMP.pdf

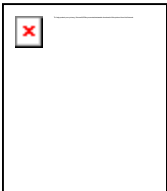
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Dear Chair Filios and Mountain View Parks and Recreation commissioners,

The Santa Clara Valley Audubon Society and GreenSpacesMV have been advocating for biodiversity in the City, and are stakeholders in the development of the Shoreline Wildlife Management Plan (SWMP). In the attached letter, we comment on Item 5.3 on your agenda tonight - Shoreline Wildlife Management Plan.

Thank you,

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February 15, 2023

To: Mountain View Parks and Recreation Commission  
prc@mountainview.gov

Re: Item 5.3 Shoreline Wildlife Management Plan

Dear Chair Filios and commissioners

The Santa Clara Valley Audubon Society and GreenSpacesMV have been advocating for biodiversity in the City, and are stakeholders in the development of the Shoreline Wildlife Management Plan (SWMP). The preparation of the SWMP was expected to start in 2019, but it was delayed due to Covid and eventually incorporated into the work plan for the Council Priority of preserving biodiversity in Mountain View.

During the Covid restrictions, the importance of an effective SWMP became clearer than ever. Wildlife thrived during the stay at home period. Later, as people started visiting the parks in greater numbers than ever, public appreciation of wildlife and nature, as well as visitor impacts on wildlife and habitat, became evident. The wildlife of Shoreline must be protected and their habitat cherished if they are to persist in our landscape.

When we advocated for the SWMP, we hoped that it would:

1. Clarify the regulatory framework and requirements that protect species and their habitat
2. Capture best practices that are currently employed by City staff in protecting and providing for the species that call Shoreline home
3. Develop and document Standard Operating Procedures and protocols for evaluating new and ongoing projects (landfill, public works, recreation, events etc.)
4. Manage visitor access and activities, and educate the public
5. Initiate critical Capital Investment Projects (CIP) to ensure that special wildlife assets are protected and enhanced (especially, the island in the Sailing Lake)
6. Use an adaptive management approach, and include a timeline and implementation plan.

The Draft SWMP has done an excellent job in addressing the first three items. It remains largely aspirational, however, in the way it addresses implementation, enforcement, the initiation of CIPs, and

funding. The treatment of the island, a critical asset that is eroding away, is of great concern. Please consider the following comments:

- The Island of the Shoreline Sailing Lake

The island provides nesting grounds to the largest nesting colony of black skimmers in the region and to several other species. We appreciate staff's diligent work to improve the nesting grounds and to manage boat access, encroachment and disturbance. However, the island is eroding away and urgent action is needed to stop the erosion and to actually enlarge the island.

When the Shoreline dock replacement and erosion control project (now in construction) was designed, we asked staff if the CIP can include erosion control at the island. The response was that erosion of the island will be addressed in the SWMP. The SWMP provides general broad brush recommendations for protecting the island from further erosion<sup>1</sup> and sets a long term goal 8.3.3 Shoreline Lake Island Enhancement to "*Decrease the rate of bank erosion of the island by employing basic principles and techniques of bank stabilization*". This goal does not actually look to stop the erosion, only to slow it down. It does not look to expand the island. And instead of recognizing urgency, it defer action to the long term.

The SWMP recognizes that the City's Public Works Department can manage the island project including permitting, design, and oversight of construction management, and that this would be a project in the City's Capital Improvement Plan.

**The process of project design and permitting can take years, and the birds that nest on the island have no time to lose. Please recommend the immediate initiation of a capital improvement project to expand (or at least restore the original size of the island, and to protect the island from erosion.** Staff can start planning and permitting a project, even if funding and implementation take a little longer.

- Managing visitor behavior / enforcement

Already, visitors stray off trails, bring in pets, fly drones in ecologically sensitive areas, sail boats too close to the island, and exhibit other irresponsible behaviors. Managing visitor behavior is challenging, and the challenge is likely to increase when thousands of new residents come to live in North Bayshore.

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<sup>1</sup> Recommendations for the island:

- The Conservation goals for the black skimmer include: Maintain the size, and suitability of habitat on the Shoreline Lake island ...
- Decrease the rate of bank erosion of the island by employing basic principles and techniques of bank stabilization such as: Building up a gradual slope on the banks of the islands with a combination of imported soils, tree logs, gravel, and/or riprap, so as to be able to absorb the energy of the waves that over-time slowly erodes the banks of the islands.
- On top of the built up banks and at the edges of the islands, plant low-growing, native, salt-tolerant vegetation such as saltgrass and Pacific pickleweed.
- Erosion control for the island will require fill of jurisdictional waters within Shoreline Lake, thus necessitating Clean Water Act Section 404/401 permits from the USACE and San Francisco Bay RWQCB.

The SWMP recommends that visitors “should” behave responsibly<sup>2</sup>, but provides no recommendations for budgeting enforcement measures (for example, funding for rangers, police training for rangers), or for funding fencing and/or other barriers to restrict access after closing hours and/or to sensitive areas in the park.

- SWMP Implementation

The SWMP provides general short and long term recommendations, but there is no clear timeline and deliverables. We appreciate ongoing staff dedication to the enhancement of habitat for the burrowing owls and other species, but would like to see some milestones associated with a timeline for restoration and other conservation activities, and with success criteria.

- Lighting

The exponential increase in lighting is harming individuals, species and populations. Light disrupts ecological synchronies, curtails wildlife corridors and devastating ecosystems on an unprecedented scale. The SWMP calls for adhering to the guidelines of the International Dark Sky Association which provide a good start, but for areas of ecological significance protecting the sky does not suffice to protect nesting grounds, wildlife corridors and riparian ecosystems.

In addition to the SWAMP recommendation for avoidance of lighting in areas of ecological importance, please recommend that when avoidance is not feasible, lighting should be dim and the blue band of light in the spectrum should be avoided (use lighting fixtures of 2400 Kelvin or less).

- Reporting

Monitoring is fundamental to adaptive management, and so we are pleased to see the recommendation for annual reporting. We ask that the annual report be shared with SCVAS and other stakeholders.

We thank the staff, H.T. Harvey consultant and the Parks and Recreation Commission for your work, and for your attention to our concerns.

Respectfully,

Shani Kleinhaus,  
Environmental Advocate  
Santa Clara Valley Audubon Society

Silja Paymer  
GreenSpacesMV



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<sup>2</sup> Examples include:

- Trail and bike pathway users should not leave established trails.
- Shoreline users should stay out of all wetland/marsh areas and burrowing owl preserves/mitigation sites.
- Shoreline users should adhere to rules prohibiting bringing pets to Shoreline.