Flynn, Allison

From: Shani Kleinhaus <shani@scvas.org>
Sent: Monday, March 7, 2022 12:48 PM
To: Parks and Recreation Commission
Cc: Marchant, John; Sylvia, Brenda; Ruebusch, Brady; James Eggers; Gladwyn D'Souza; , City Clerk; Giulianna Pendleton
Subject: Item 5.3 on PRC March 9: Shoreline Wildlife Management Plan (SWMP)
Attachments: SCVAS and SC comments_ Shoreline Wildlife Management Plan outline (1).pdf

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Dear chair Bryant and Park and Recreation commissioners,

The Santa Clara Valley Audubon Society and the Sierra Club Loma Prieta Chapter submit the attached letter to the Parks And Recreation Commission regarding Item 5.3 on the March 9 agenda, Shoreline Wildlife Management Plan.

We thank you for your consideration,

Shani Kleinhaus, Ph.D.
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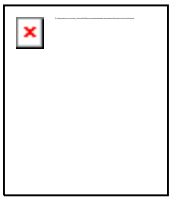


March 7, 2022

Parks and Recreation Commission
City of Mountain View

Re: Item 5.3 Shoreline Wildlife Management Plan (SWMP)

Dear Chair Bryant and Parks and Recreation Commissioners,

Santa Clara Valley Audubon Society and the Sierra Club Loma Prieta Chapter are pleased to see the Shoreline Wildlife Management Plan (SWMP) moving forward. This plan, which we have long advocated for, will help implement the City Council priority of biodiversity, and is timely as the nation[1], and especially California, is experiencing loss of biodiversity and a changing climate.

The proposed SWMP outline is a very good start. We appreciate the opportunity to comment and hope you consider the following recommendations and comments.

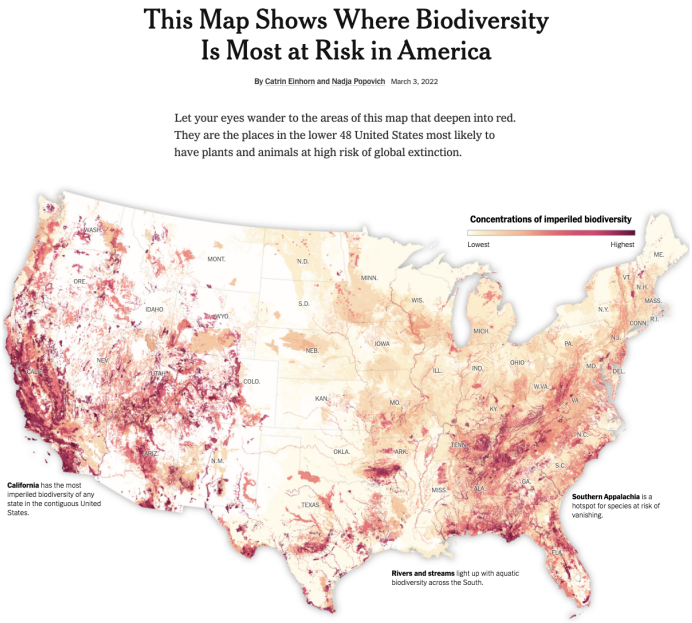


Figure 1: Biodiversity in California, including the Bay Area, is at a risk as extinction accelerates

[1] https://www.nytimes.com/interactive/2022/03/03/climate/biodiversity-map.html

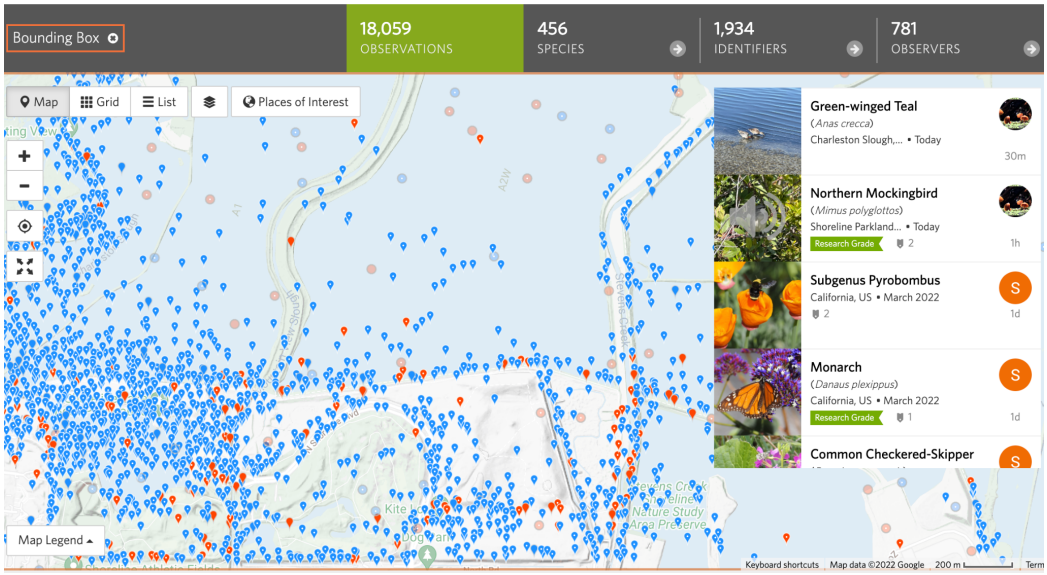
1) Species

The SWMP outline proposes a focus on four protected bird species as “umbrella species' ' for habitat management and enhancement. While we agree that good habitat management for Burrowing owls[2] complemented by habitat management for the four focus species (California Ridgway’s rail, black skimmer, white-tailed kite, and San Francisco common yellowthroat) will benefit many other wildlife species; we believe that protecting biodiversity in times of climate change should be broader.

There are both rare and common species at Shoreline that delight visitors and have specific needs that are not similar to the needs of the four focus species. These include Monarch butterflies, cliff swallows, and Sierran Tree Frog. We hope these species can be added to the plan.

In addition, we ask for the following mammal species to be added: California Ground Squirrel, hares and rabbits. Ground squirrels are important to ecosystem function. Rabbits are important prey items to raptors. Both are good indicators for ecosystem health in grasslands along the Bay.

Figure 2: iNaturalist observations[3], Shoreline



2) Boundaries

The proposed SWMP boundaries do not extend beyond Shoreline. We ask you to consider including the Charleston Retention Basin in the plan. This is a freshwater wetland where Google invested in expanding willow and oak ecosystems. Google committed to the management of landscaping at the Retention Basin for a limited period of time, and the responsibility should

[2] Burrowing Owl Preservation Plan, 2012
http://www.elkhornsloughctp.org/uploads/files/1408724962Mountain%20View%20Burrowing%20owl%20management%20plan.pdf

[3] https://www.inaturalist.org/observations?iconic_taxa=Mammalia,Aves,Amphibia,Reptilia,Arachnida,Insecta&nelat=37.43832214482853&nelng=-122.0486200042069&place_id=any&subview=map&swlat=37.419578473852596&swlng=-122.10900189355016

return to the City soon. One of the focus species (San Francisco Common Yellowthroat) nests in the retention basin marsh, and another (white-tailed kite) nests close by. The retention Basin is also rich in butterfly and native bee species. Habitat management in the Retention Basin is important to provide spatial connectivity (through the Stevens Creek Corridor) for these and many other species.

3) Prioritization and implementation
   The proposed SWMP outline does not include prioritization or an implementation plan. While many management elements are likely to depend on resources and be implemented in an ongoing manner, some actions must be prioritized and acted on soon. For example, protecting the Sailing Lake Island from erosion should be considered a critical element of the plan. The process for designing and permitting the necessary erosion-control measures can take a very long time, and should start right away. In contrast, volunteer focused activities such as weeding may be easier to fund and implement, but the benefits to shoreline wildlife may be less significant. An implementation plan should help prioritize and schedule plan elements.

4) One important habitat element at Shoreline is man-made structures. Buildings are used for nesting by swallows and many other bird species, culverts are used as den sites for foxes, as are stockpile areas and pipes. Fences protect nesting areas for burrowing owls. Frogs find shelter in irrigation boxes.
   The SWPM should expand efforts to protect wildlife in man-made structures, and add structures such as culverts, small frog ponds (1-3ft diameter), nest boxes etc.

5) Artificial Light at Night is emerging as a driver of insect decline, interferes with bird migration and disrupts wildlife corridors. Please include lighting controls in the SWMP for all terrestrial, bayland and aquatic ecosystems.

6) Comments by section:

Section 1. Introduction

- 1.1 Management Area and 1.3 Nearby Habitat Restoration/Management Efforts - add the Charleston Retention Basin
- 1.2 Background, Purpose, and Goals of the Plan - include protocols for coordination within the Community Services Department (recreation vs conservation, vegetation management) and with other City Departments (Fire, Public Works) as well as outside agencies (PGE, Salt Pond Restoration Project)
- 1.4.1 Target Special-Status Species - see our Comment 1. about adding species above. In addition, for burrowing owls and for each of the four SWMP focus species, it would be helpful to list other shoreline species that could benefit from habitat management for that particular species.
- 1.4.5 Management and Educational Guidelines - This section of the SWMP proposes to provide protocols and Standard Operating Procedures (SOP) for maintenance crews, City staff, and contractors to ensure compliance with all State and Federal codes and requirements. While we agree that these are critically important, to preserve biodiversity the SOPs should look beyond mandatory compliance, and include best practices that are focused on protecting wildlife and on preserving and enhancing habitat for the animals of Shoreline (many of which are not protected by state or federal regulation). Most maintenance activities should include review by Shoreline

biologists to ensure compliance but also, ensure that no harm is done to common species unnecessarily.

- 1.4.6 Monitoring and Adaptive Management - these are critical elements of any wildlife management plan. In addition to monitoring by the City, we suggest including a periodic review of Citizen Science databases such as eBird and iNaturalist observations to see if any of the common species are in decline (declining reported observations).
- 1.4.7 Annual Reporting - can annual reports be transparent and available to the public?
- 1.4.8 Plan Review and Revision - Will the SWMP include measures of success for the focus species (nesting, nesting success) and others, and a measure of species richness to detect biodiversity trends?

Section 2. Regulatory Framework

- 2.1.2 Federal Endangered Species Act - please add the Monarch butterfly to the protected species list
- 2.3 City of Mountain View Policies and Procedures - Discuss the City's priority for Biodiversity.

Section 3. Shoreline Ecosystems and Wildlife Corridors

- Shoreline ecosystems and wildlife corridors should embrace wildlife-oriented vegetation management - trim only where absolutely necessary, outside the nesting season, and avoid trimming berries seeds and flowers.

Section 4. Special-Status Species of Shoreline

- Please include the Monarch butterfly

Section 5. Locations of Nesting Birds and Sensitive Nesting Areas

- 5.3 Potential Nesting Bird Impacts - please add flushing birds off nests, which exposes eggs and chicks to the elements and to predators.
- 5.4 Nesting Bird Avoidance and Minimization - We believe that this section should include a robust discussion and best methods designed to help avoid or even help, rather than mitigate, nesting birds. Why allow destruction of a nest, even if eggs have not been laid, unless absolutely necessary?

Section 6. Target Species Conservation

- See comment 1) above
- 6.1 Black Skimmer - consider erosion at the island as a critical issue that requires urgent action
- 6.2 California Ridgway's Rail - consider covered floating islands[4]
- 6.4 San Francisco Common Yellowthroat - include the Charleston Retention Basin in the SWMP

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4 https://midwestfloatingisland.com/wp-content/uploads/2015/05/Floating-Islands-Provide-Habitat-for-Highly-Endangered-California-Clapper-Rail-.pdf

Section 7. Management of Invasive and Nuisance Species, and Pathogens

- 7.1.3 Measures for Invasive Plant Control should focus on minimizing disturbance. Please do not remove weeds unless they are immediately replaced with natives, and make sure vegetation management is not harmful to wildlife.
- 7.3.1 Potential Pathogens of Concern - please include toxoplasmosis and distemper, discuss how they are transmitted, and describe the wildlife species that are vulnerable to them.

Section 8. Habitat Management Guidelines, and Enhancement and Restoration Opportunities

- 8.2 Types of Enhancement and Restoration Opportunities - See comment 4) above. Please include small (1-3ft), managed anuran ponds and keep water in them while frogs are developing from eggs to tadpoles to frogs.

Thank you,

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Environmental Advocate
Santa Clara Valley Audubon Society

Gladwyn d'Souza
Conservation Committee Chair
Sierra Club Loma Prieta Chapter

CC:
John Marchant, Community Services Director
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