



June 5, 2017

Ms. Clare Campbell
Mr. Peter Jensen
Planning and Community Environment Department
City of Palo Alto

Re: Palo Alto Parks, Trails, Natural Open Space and Recreation Master Plan
Initial Study/Mitigated Negative Declaration

Dear Ms. Campbell and Mr. Jensen,

The Santa Clara Valley Audubon Society (SCVAS) appreciates the opportunity to comment on the Mitigated Negative Declaration (MND) for the Palo Alto Parks, Trails, Open Space and Recreation Master Plan (Plan). SCVAS is one of the largest Audubon chapters in California. Our mission is to promote the enjoyment, understanding, and protection of birds and other wildlife by engaging people of all ages in birding, education, and conservation.

We have hundreds of members in Palo Alto who enjoy the City's parks and open space. We have been active in the public outreach process of updating the Plan, and we are thankful for the opportunity to have a representative from our organization on the stakeholder group. Please consider the following comments:

1. Please describe and cite the **Palo Alto City's Charter, Article IIIV "Parks"** in the Plan and in the IS/MND Project description / Regulatory Setting (MND, page 42). Please add a map of Dedicated open space and parkland to the Plan.

2. Section 2.9.4 Needs (p. 11-12)

The need for nature in natural open space as well as in urban/suburban parks (including enhancement of habitat, and pollinator-corridors throughout the city) was identified in the Plan's Title, guiding Principles ("Nature") and the Goals ("Preserve and integrate nature, natural systems, and ecological principles throughout Palo Alto"). Hundreds of participants in the public outreach process identified nature, access to nature, relaxation in nature, and habitat for wildlife etc. in their responses to questionnaires, intercept events and community meetings.

This need does not appear in the "Needs" section. The MND proposes, "Five categories of park-related activities were identified during the community outreach process as being important: Relax and enjoy the outdoors...."

- Please add a Need: “Conservation, restoration and enhancement of nature and wildlife habitat, and providing access to nature”

3. Mitigation Measure Bio-1 – please expand the riparian Corridor to 100-ft from the outer Drip-line of the riparian vegetation for most activities, and 200-ft for active recreation areas. This would bring the mitigation to current minimum City standards, as recently adopted by the City of San Jose. In San Jose, most riparian projects are subject to a minimum setback of 100 feet with the exception of: multi-use trails (10 feet), crop and horticultural projects (25 feet), equipment/chemical storage (300 feet), and active recreational areas (200 feet). Setbacks are measured from the outside drip line of the Riparian Corridor vegetation or top-of-bank; whichever is greater (see San Jose Council Policy Number 6-34, pages 3-5).

4. Mitigation Measure Bio-2 – “Active nesting is present if a bird is sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest” please add: or fledgling’s are using or being fed in the nest or its immediate vicinity.

5. Access to Nature – please discuss and mitigate impacts of providing new access to natural areas, especially in open space preserves and along wetlands and creeks. Please discuss the impacts of allowing dogs on new trails in open space preserves and along creeks.

We appreciate the opportunity to participate in the planning and outreach process and to comment on the Mitigated Negative Declaration. Please do not hesitate to contact me if you have questions.

Sincerely,



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Santa Clara Valley Audubon Society
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