

Transmitted via email August 9, 2022

August 9, 2022

City of Petaluma Planning Commission 11 English St. Petaluma, CA 94952

## Re: Scott Ranch/Kelly Creek property and environmental review, August 9, 2022

Dear Members of the Planning Commission,

Madrone Audubon is a 501c3 nonprofit conservation organization in Sonoma County. In our 55<sup>th</sup> year, Madrone Audubon is the Sonoma County Chapter of National Audubon and serves approximately 3000 members, including many in Petaluma. We have enjoyed a productive relationship with Sonoma County Regional Parks, including completing Bird Identification Checklists for three of the County's most popular parks – Taylor Mountain Regional Park, Spring Lake Regional Park and Doran Beach Regional Park.

Madrone Audubon also has a long history of conservation efforts and achievements in Petaluma. Our organization was the fiscal sponsor of Petaluma Wetlands Alliance for 13 years, during which time the third-grade wetlands education program was developed and supported for many years. Our outing leaders frequently lead guided walks at Ellis Creek, Shollenberger Park and Helen Putnam Regional Park as part of our monthly free public outing series. Madrone Audubon funded the interpretive kiosk and bench located at the Sheraton Hotel entrance to Alman Marsh, in memory of an outstanding naturalist and owler, Doug Ellis. Our organization was a coplaintiff with the City of Petaluma and Friends of Shollenberger Park in the Dutra asphalt plant opposition effort and raised significant funds to support that effort. In 2014, Madrone Audubon funded and prepared the City of Petaluma's Petaluma Wetlands application for the designation as a Ramsar Wetland of International Importance, following up for four years to ensure the designation became official, finally, in 2018.

For the last 15 years, Madrone Audubon has also supported the significant conservation work of Paula Lane Action Network (PLAN) in West Petaluma and California, including opposing a proposed subdivision on Paula Lane immediately adjacent to the conserved Paula Lane open space land. That proposal presented significant negative impacts to the protected conservation values of the open space land. In 2016, Madrone Audubon became a partner in the Paula Lane

Madrone Audubon Society is qualified as an organization recognized under Section 501(c)(3) of the Internal Revenue Code. Contributions are deductible by the donor under Section 170. Federal Tax I.D. 94-6172986 Nature Preserve education program, sponsoring the *Paula Lane Phenology Project*. The Phenology Project, citizen science research for beginning and advanced observers, was one of only four in California affiliated with Audubon California, and part of the National Phenology Project. Your local newspaper, the *Argus-Courier*, published an article in 2016 about this innovative and climate change-relevant project. We were pleased to sponsor the project, and volunteers from Petaluma and other areas of Sonoma County (Santa Rosa, Sonoma, Sebastopol) visited the open space land once monthly to record observations on data sheets and input observations into a special database. Local data was then integrated into the national database. The richness of species at the Paula Lane Nature Preserve contributed to building data to guide understanding of the inter-relation of plants, mammals and birds. Observing for changes in phenophases helped guide decisions and actions for ecosystem restoration and enhancement to support the many species of this special land. A phenophase is "an observable stage or phase in the annual life cycle of a plant or animal that can be defined by a start and end point." Nesting behaviors, timing of nesting, and outcomes, timing of presence of migratory and resident birds, blooms and fruits on plants are examples of observing phenophases.

The *Paula Lane Phenology Project* observations have included 9 avian, 4 plant and 2 mammal species (common names below):

<u>Avian:</u> Acorn Woodpecker, Cedar Waxwing, Anna's Hummingbird, Calliope Hummingbird, Rufous Hummingbird, Violet-Green Swallow, Say's Phoebe, Dark-eyed Junco, Mourning Dove – selected as representative from over 100 avian species of the property and area.

Plants: Miner's Lettuce, California Wild Rose, Salmonberry, Coffee berry, Hummingbird Sage

Mammals: Black-tailed Deer, American Badger

Data from the National Phenology Project helps inform us about the same species in other areas of our country. Multiple tools are available from the National Phenology Project for analysis of gathered data by citizen scientists. Unfortunately, in 2019, our ability to continue the project was interrupted due to inability to access the property as well as destruction of habitat areas, including plantings observed for over three years.

The National Phenology Project is an excellent resource for monitoring how plants, birds and animals are responding to and adapting to climate change impacts. The local Paula Lane project exemplifies citizen science applicable to the Kelly Creek property and its vastly rich and varied biological resources. Expanding the Phenology observations of Paula Lane to Kelly Creek would support understanding of birds and wildlife in a connected wildlife corridor as well as how avian species migrate to and utilize both habitat areas for nesting and sustenance. Specific to the Kelly Creek property, data gathering relevant to California Red-legged Frog could be very meaningful.

Madrone Audubon Society is qualified as an organization recognized under Section 501(c)(3) of the Internal Revenue Code. Contributions are deductible by the donor under Section 170. Federal Tax I.D. 94-6172986 Dr. Shawn Smallwood's February 28, 2021, biological opinion reflected site visit observations. A keen observer and researcher, he reported identifying **43 vertebrate species**, including **6 special status species**, during a <u>3-hour</u> site visit. His comprehensive report includes Table 1 on page 3, identifying the observed 43 species. Almost all species are included in the Paula Lane Wildlife Inventory (copy attached), provided to Madrone Audubon as we structured the Phenology Project. The Paula Lane open space land, north of the Kelly Creek property, is connected via a wildlife corridor. Dr. Smallwood further clarifies in his report the likelihood of **67 special status species** to occur on the Kelly Creek property (Table 2, pp. 14-16). These species are also relevant to the Paula Lane open space land connected via the wildlife corridor. Direct observations of wildlife movement over 15+ years by PLAN observers has contributed to the ability to map Petaluma Valley's wildlife corridors and crossings, a significant contribution to Petaluma conservation by Paula Lane Action Network.

As described, Madrone Audubon has for many years supported and partnered with Paula Lane Action Network for conservation. Within this context, we note the Kelly Creek property is exceptional in terms of biodiversity and habitat for multiple species. The absence of human encroachment on this land contributes to safe and available habitat for species to sustain and survive.

We support comments submitted to your Commission on August 8, 2022, by Paula Lane Action Network, and agree that PLAN's and our organization's experiences in this area of Petaluma provide a realistic context through which to understand the significance of the Kelly Creek property as part of a larger habitat and corridor area, supporting birds, wildlife, including the California Red-legged Frog, and wildlife movement.

Your Commission is likely familiar with the National Audubon Society's 2014 Birds and Climate Change Report. This report, with alarming findings, found of 314 species at risk from global warming, 126 were classified as climate endangered and projected to lose more than 50 percent of their current range by 2050. The other 188 species were classified as climate threatened and expected to lose more than 50 percent of their current range by 2080 if global warming continues at its current space. We as a nation and internationally are racing against time to address decreasing global temperature and greenhouse gas emissions. Madrone Audubon is dedicated to collaborating in our Bay Area region, interfacing for meaningful legislation and funding for climate action, and creating and managing programs and activities to support habitat protection and conservation. We are at risk of walking outdoors one day and experiencing the "silent spring." While locally, nationally and internationally, we address actions to decrease carbon and methane gase emissions, endeavoring to lower the global temperature, we must concurrently and proactively boost our awareness and actions related to habitat and species, including land conservation, research and education – and appreciation for non-human species.

We urge your Commission to thoroughly review findings and suggested mitigation measures of the Final Environmental Impact Report before you, and very seriously consider the significant Madrone Audubon Society is qualified as an organization recognized under Section 501(c)(3) of the Internal Revenue Code. Contributions are deductible by the donor under Section 170. Federal Tax I.D. 94-6172986

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impacts to habitat and species of the proposed housing project along with the proposed park extension project.

Please keep in mind that local Phenology Projects such as the project innovatively initiated at the Paula Lane Nature Preserve over 6 years ago provide reliable local data for West Petaluma biological resources. In addition, nonprofit organizations such as ours interface with broader organizational efforts such as the National Phenology Project and the National Audubon Society. Such connectivity of efforts can support saving our lands and our waters, and to do so in concert with each other for the higher good of all species and our planet can make a life-saving difference..

Síncerely,

## Susan Kírks

Susan Kirks, President Madrone Audubon Society

Enclosure: Paula Lane Wildlife Inventory