



Madrone Audubon Society

INCORPORATED

September 16, 2023

Transmitted via email September 17, 2023

Mayor and Members of City Council
City of Petaluma
11 English Street
Petaluma, CA 94952

**Re: Continued Sept. 11, 2023 Agenda Item 14 to Sept. 18, 2023,
Agenda Item 13 –**

Introduction (First Reading) of an Ordinance Granting Temporary and Permanent Easements and Adoption of a Resolution Granting a License for Replacement of PG&E Gas Main Facilities on the City's Shollenberger Park Property and Making Findings in Accordance with Section 21081 of the Public Resources Code and Section 15096 of the CEQA Guidelines that Changes or Alterations Have Been Incorporated into the Project which Mitigate or Avoid Potentially Significant Impacts of the Project on the Environment, and that Those Changes or Alterations Are Within the Responsibility and Jurisdiction of the State Lands Commission as Lead Agency for the Project Pursuant to CEQA, and Have Been Adopted by the Commission on August 17

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Further Discussion - Review of Mitigated Negative Declaration and Mitigations for PG&E Company Gas Line 012G Replacement Project (L-021G/R-708) Across the Petaluma River – State Clearinghouse No. 2023060440 – Appendices and CA Department of Fish and Wildlife Correspondence 07/14/2023

Dear Mayor and Members of the City Council:

We reviewed Appendices of the Mitigated Negative Declaration as well as the CA Department of Fish and Wildlife Correspondence of July 14, 2023.

As you may recall, we focused our concerns, with questions and recommendations in our comment of September 10, 2023, on the fully protected species – Black Rail, Ridgway's Rail and Salt Marsh Harvest House.

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Notably, PG&E proposed inadequate mitigation measures, which were addressed by the CA Department of Fish and Wildlife. Discussion of potential significant negative impacts with higher levels of mitigation and mitigation monitoring are required. Also, notably the original schedule for this proposed project was during annual active bird nesting season in Spring and Summer, which was totally inappropriate. The project timeline has now been changed to phase 1 of mid October to the end of December 2023 and, if needed, phase 2 with the same timeframe. This is project work occurring outside active bird nesting season, but within a timeframe for Salt Marsh Harvest Mouse reproduction and raising of young.

We posed a question to the CA Department of Fish and Wildlife about exclusion fencing for Salt Marsh Harvest Mouse. As a year would occur between phase 1 and phase 2, we believe fencing should be removed at the end of phase 1 and the process of inspection, flushing, vegetation removal and fence installation re-implemented just prior to the start of phase 2. We hope to receive a response from the CA Department of Fish and Wildlife before your Monday, September 18, meeting. ***However, if the response is not received by then, we request your Council raise this question and support our request.***

The CA Department of Fish and Wildlife has required higher level mitigations and mitigation monitoring, which are definitely needed, for the fully protected species we have discussed.

Members of the public have contacted us with concerns, as awareness increases about this project, and wonder about the imbalance and impacts of too many people being diverted to Alman Marsh and to Ellis Creek trails. We believe this needs more consideration. In our comment of September 10, we mentioned the City of Petaluma or PG&E providing paid park passes for members of the public to Helen Putnam Regional Park and Tolay Lake Regional Park, along with free micro-transit to both locations at specified times. This would support equity in the community and offer service by the City of Petaluma during full weekday closures. These closures appear to be for three months with potentially limited access on weekend days. Residents and visitors regularly and daily enjoy Shollenberger Park as a free public amenity.

Lastly, with initiation of bird nesting surveys in 2023, protected buffer zones, and awareness about nesting season at Alman Marsh, Shollenberger Park, and Ellis Creek WRF, timing for vegetation management, October through December, needs to be addressed. We request the City of Petaluma interface with PG&E to facilitate vegetation management by the City and Petaluma Wetlands Alliance stewards on

weekdays while the PG&E project, if approved, is underway. Mid-September through January is the timing for vegetation management, outside nesting season.

Sincerely,

Susan Kirks

Susan Kirks, President
Madrone Audubon Society