



March 13, 2018

Planning Department
ATTN: Paul Kermoyan
paulk@cityofcampbell.com
City of Campbell

Re: Envision Campbell General Plan Update

Dear Mr. Kermoyan,

The Santa Clara Valley Audubon Society, Sierra Club Loma Prieta Chapter, California Native Plant Society Santa Clara Valley Chapter, and South Bay Clean Creeks Coalition write to encourage the City of Campbell to incorporate visions, goals, and policies into the Envision Campbell General Plan that look to protect and enhance natural resources throughout the City. Together, our organizations represent thousands of members in Santa Clara County, including Campbell, who care deeply about preserving open space, natural ecosystems and wildlife. We urge the City to join other Bay Area jurisdictions in directing growth that embraces native landscapes, plants and wildlife, and integrating nature into the planning of a cutting-edge sustainable community. Please consider creating a Natural Environment Element to the General Plan. For a framework for a Natural Environment Element, please consider the Sierra Club Loma Prieta Chapter's Guidelines for Natural Elements (attached) and the new Palo Alto Comprehensive Plan¹.

Please consider the following suggested additions to the Envision Campbell General Plan:

1. Vision

By incorporating nature into the vision of the General Plan, the City can direct future development in a manner that regenerates and retains ecological integrity while providing residents with opportunities to connect with the natural world and maintaining a high quality of life in Campbell. Neighboring cities have recognized the value of protecting the urban forest and natural environment, both for people and wildlife, and have included nature in their visions and guiding principals. Palo Alto's 2030 Comprehensive Plan includes a Natural Environment Element that envisions "Palo Alto will respect and manage natural resources in a way that sustains the natural environment and protects our foothills, baylands, creeks, parks, urban forest, wildlife and open space legacy."² In Mountain View's North Bayshore Precise Plan, the area is envisioned as "a district that supports and enhances wildlife, trees, and habitat areas."³

¹ <http://www.paloaltocompplan.org/>

² http://www.paloaltocompplan.org/wp-content/uploads/2017/07/5_NaturalEnviro_June30_Clean.pdf

³ <http://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=15050>

We encourage the City of Campbell to adopt a vision that includes the urban forest, and looks to protect and regenerate natural and biological resources in the City. We hope the Envision Campbell General Plan Vision incorporates:

“Development respects and enriches city habitats to allow birds and pollinator species to thrive in Campbell. The Los Gatos Creek corridor functions as a healthy ecosystem that is appreciated by people and supports wildlife. The Urban Forest, open space and parkland are preserved and expanded for residents to enjoy.”

2. Goals

The Envision Campbell General Plan goals should aspire to integrate nature into the urban environment by supporting the vision and providing a framework for implementation. Key areas of focus include the urban forest, riparian corridors, parks and open space, and bird-safe design for all new buildings. The City’s commitment to these goals should be reflected in associated policies. We recommend looking to the goals in Chapter 3: Environmental Leadership of San Jose’s Envision 2040 General Plan⁴ (see pages 22-30) and in Palo Alto’s Natural Environment Element² as examples.

Suggested Goals:

- **Urban Forest:** *The urban forest is healthy and thriving in public and private land. Native tree species are preserved and protected and the planting of new native trees is encouraged.*
- **Riparian Corridors:** *Creek corridors are protected and restored to retain healthy ecological functions and provide opportunities for people to connect with nature.*
- **Parks and Open Space:** *Natural open space areas and parklands are retained and expanded to provide native habitat for wildlife and to ensure a high quality of life in the City.*
- **Bird-safe Design:** *Bird-safe building design is implemented for all new construction in order to protect resident and migratory bird species from collision, especially along riparian corridors and open space areas.*

3. Policies

Urban Forest

The urban forest is an integral component of the region’s ecology, providing an array of benefits for both people and wildlife. Historically, the Silicon Valley supported oak woodlands and oak savannahs that provided sustenance for diverse populations of birds and wildlife. Today, many of these native oak forests have been replaced with ornamental, non-native trees that provide little habitat value for birds and wildlife.

The City of Campbell has an opportunity to become a regional leader in restoring the urban forest to replicate native California oak landscapes. We encourage the City to adopt policies in the General Plan or/and in an Urban Forest Master Plan that prioritize the preservation and re-planting of oaks

⁴ <http://www.sanjoseca.gov/DocumentCenter/Home/View/474>

and other native species. We recommend the San Francisco Estuary Institute's Re-oaking Silicon Valley Report as a guideline.⁵

Suggested Policies:

- *Preserve and protect existing native trees through tree protection and education programs*
- *Encourage the planting of native trees, especially oaks, to improve the ecological integrity of the urban forest*
- *Prioritize the preservation of trees along riparian corridors and in open space areas*

Riparian Corridors

Riparian habitats support an abundance of birds and wildlife and play a vital role in connecting landscapes for wildlife movement. Further, the health and functionality of these ecosystems are critically important to water quality and supply. In Campbell, the Los Gatos Creek corridor is a unique and defining feature that should be protected and enhanced for residents to enjoy. As the City looks to redevelop areas along the Los Gatos Creek corridor, it is imperative that future development respects this sensitive ecosystem with appropriate setbacks and efforts to restore the creek to its natural state.

In 2008, Campbell adopted the "Guidelines and Standards for Land Use Near Streams" of the Santa Clara Valley Water Resources Protection Collaborative.⁶ These guidelines direct a 15-foot setback for channelized streams and a 20 to 25-foot setback for natural streams. While we applaud the City for adopting these guidelines, we believe they fall short of accomplishing true balance between urban development and preserving riparian habitat.

Many other cities in Santa Clara County have gone a step further and adopted riparian policies that aim to preserve the ecological integrity of riparian ecosystems. For example, Mountain View has established a 200-foot "habitat overlay zone" for creeks and sensitive habitats in the North Bayshore.² In San Jose, new development is required to adhere to a 100-foot setback.⁷ Additionally, we encourage Campbell to limit trail development to one side of any stream in order to protect sensitive riparian ecosystems from human encroachment.

Suggested Policies:

- *Install a "Habitat Overlay Zone" or a 100-ft setback from riparian habitat for all new development*
- *New development should not encroach on riparian habitat through lighting, noise, toxic substances or non-native landscaping*
- *Enhance and restore riparian habitat through daylighting of streams, native plant restoration, and removal of non-native/invasive plants*
- *Trail development should be limited to one side of any stream*

⁵ <http://www.sfei.org/documents/re-oaking-silicon-valley>

⁶ <https://www.valleywater.org/sites/default/files/WRPC%20Campbell.pdf>

⁷ <https://www.sanjoseca.gov/DocumentCenter/View/60393>

Open Space

Access to open space areas is currently limited in Campbell, with only a handful of parks available for residents to enjoy. With the new General Plan update, the City has an opportunity to identify the need for new and improved open space areas that offer habitat and provide opportunities for people of all ages to connect to nature, especially along the Los Gatos Creek corridor.

Suggested Policies:

- *Expand the park system from within the urban core to the Los Gatos Creek Corridor with new private and public open space areas*
- *Retain and enhance existing parkland with natural features such as water resources and native plantings that offer habitat for birds and wildlife*
- *Protect wildlife movement corridors within the park system and reinforce the landscape linkage along Los Gatos Creek*

Bird-safe Design

We urge the City to add a policy for bird-safe building design to the new General Plan. Such policy would help reduce bird mortality due to collision with buildings in the City and save migratory and resident bird populations. We believe that it would add an important facet to sustainable planning and to quality of life - human and avian – in Campbell.

It is now widely recognized that bird collisions with man-made structures, especially glass buildings and glassy elements, are significant contributors to bird-mortality and, most importantly, to the decline of bird populations in North America. Birds collide with glass buildings and structures during the day as they attempt to access resources reflected by or seen through the glass. At night, brightly lit buildings lure migrating birds to their death. Fortunately, there are simple, inexpensive solutions that, when incorporated into a Project's design, can prevent bird strikes.⁸

Many neighboring cities recognize bird-collision with glass as an important issue and make an effort to minimize hazardous construction. The issue is addressed in General and Specific Plans (San Jose, Palo Alto, Mountain View), in Ordinances and mandatory Guidelines (San Francisco, Oakland, San Jose, Sunnyvale, Richmond) and in Mitigation Measures for areas near the Bay (Menlo Park). All of these cities look to provide standards and ordinances for bird-friendly design for any buildings located along and near the Bay. Some cities also require or recommend bird-friendly design and the regeneration of ecosystems along creek corridors.

Along riparian corridors and open spaces, it is especially important to implement avoidance and minimization measures to prevent bird carnage. We recommend following the bird-safe design guidelines of Mountain View's North Bayshore Precise Plan (below) and planning with respectful setbacks from sensitive habitats to prevent unnecessary bird deaths.

⁸ https://abcbirds.org/wp-content/uploads/2015/04/Bird-friendly_Building_Guide_WEB.pdf

Suggested Policies:

- *All new construction, building additions, and/or building alterations shall adhere to the Bird Safe Design standards in this section.*
- *No more than 10% of the surface area of façades shall have untreated glazing between the ground and 60 feet above ground. Examples of bird-friendly glazing treatments include the use of opaque glass, the covering of clear glass surface with patterns, the use of paned glass with fenestration patterns, and the use of external screens over non-reflective glass.*
- *Occupancy sensors or other switch control devices shall be installed on non-emergency lights. These lights should be programmed to shut off during non-work hours and between 10:00 pm and sunrise.*
- *New construction shall avoid the funneling of flight paths along buildings or trees towards a building façade.*
- *New construction and building additions shall avoid building glass skyways or walkways, freestanding glass walls, and transparent building corners. New construction and building additions should reduce glass at tops of buildings, especially when incorporating a green roof into the design.*

Through implementation of the vision, goals and policies we have suggested, we believe Campbell can become a regional leader in environmental stewardship and a model for urban growth that is sensitive to nature. By retaining, improving and protecting natural features within the City, Campbell can provide residents with a high quality of life that allows them to connect to nature in their backyards and neighborhoods. For more information, we hope you will review H.T Harvey's Urban Design Guidelines⁹ and the Sierra Club Checklist of Urban Habitat Design Guidelines (attached).

Thank you for your time and consideration. We are available to answer any questions, and we look forward to working with the City of Campbell throughout the General Plan Update process.

Sincerely,

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Santa Clara Valley Audubon Society

Katja Irvin
Co-Chair, Conservation Committee
Sierra Club Loma Prieta Chapter

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⁹ <http://internal.harveyecology.com/harvey/UrbanDesignGuide.pdf>