



## SANTA CRUZ COUNTY GROUP

Of The Ventana Chapter

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To: Lee Butler, Director  
Clara Stanger, Associate Planner II  
Eric Marlatt, Principal Planner

809 Center Street, Rm. 2107  
Santa Cruz, CA 95060

**Subject: Bird Safe Design (BSD) Building Standards for the City of Santa Cruz**

Dear Lee, Clara & Matt,

The Sierra Club thanks you for the opportunity to review the Draft for the City of Santa Cruz Bird-safe Design (BSD) Standards. Thanks to your efforts and time the City of Santa Cruz is moving forward to join the other Bay Area Cities Planning Departments who have incorporated these BSD Standards, so crucial to avoid the deaths of countless birds as in the photo below.

The Sierra Club carefully reviewed the City's BSD Standards Draft and consulted with the American Bird Conservancy Director of the Glass Collision Program, Dr. Christine Sheppard, the Environmental Advocate of Santa Clara Valley Audubon Society, Dr. Shani Kleinhaus, the Environmental Advocacy Associate of Santa Clara Valley Audubon Society, Mackenzie Mossing. Our review is based on our common aim that the City of Santa Cruz maintains its valued reputation as an environment-friendly City.

1. The Sierra Club regretted that the City Draft did not include BSD Standards for other City locations. It is our hope that this topic can be revisited in the future.
2. Since no other city locations are addressed, the reviewers recommend the following guideline under: ***When do the standards apply?***

Bird-safe building design standards apply to any portions of buildings or structures that are located within 300 feet of CR, PR, NA or AG could reflect areas with a General Plan land use designation of CR, PR, NA, or AG, or any open waterway mapped in the City-wide Creeks and Wetlands Management Plan and require design review.

The reason for the proposal is:

- the land use designation list in the City Draft for BSD Standards include areas in the critical migratory corridor that are well known for their high migratory/local bird population within close urban vicinities.
- the CR (Coastal Recreation), PR(Parks), NA(Natural Areas), AG(Agricultural Residence/Grazing) areas are in close vicinities to urban development to which the City Draft does not apply any BSD Standards.
- San Francisco applied the following BSD guideline for CR, PR, NA:  
 “within 300 feet of an urban refuge: Open spaces 2 acres or larger dominated by vegetation, including vegetated landscaping, forest, meadows, grassland, water features or wetlands.  
 (line 5 on page 39); open water (line 6 on page 39); and green rooftops 2 acres or greater. (line 7 page 39)”
- Sunnyvale applied these BSD guidelines:  
 "If within 300 feet of a body of water larger than one acre in size or located immediately adjacent to a landscaped area, open space or park larger than one acre in size”
- both cities apply the 300 feet for BSD Standards guideline to areas such as the City Draft lists.
- the proposal reflects Chapter 10 of the General Plan: Natural Resources and Conservation.

**3.** The heading ‘Which architectural features require glazing treatment?’ sets the glass standard at ‘any contiguous glazing at least 24 square feet in size and within 40 feet above grade.’

The reviewers want to revisit this glass standard, because:

- 24 square feet is considered a very large glass surface by BSD Standards according to Dr. Christine Sheppard and Dr. Shani Kleinhaus. Glass surfaces below that measurement are exempt although they pose a bird collision threat.
- the City Draft allows for any amount of abutting glass surfaces next to each other without intervening mullions.
- other cities have had serious issues with bird glass collisions due to improper guidelines on that topic.
- other cities have addressed the architectural features by applying percentage to the total amount of building glass surfaces and not specified the square footage for glass standards.

**4.** The UV pattern film under the topic **Glazing treatment standards** can be deleted, because the latest research has shown that the UV pattern film doesn’t work well and is expensive.

5. Our review showed that the **Lighting standards** section requires further details, because

- the latest research from IDA has detailed information for correct wildlife light spectrum.
- the American Bird Conservancy's chapter *LIGHT: PROBLEM AND SOLUTION* (page 27) has detailed guidelines for lighting, which show that proper light BSD Standards save energy as well as birds.
- the correct BSD light fixtures have health benefits for fauna, flora and humans (page 30 in chapter [Bird-friendly-Building-Guide 2015.pdf](#))

6. Under the heading *Exceptions* our review took note that a Zoning Administrator will determine the exceptions. This is agreeable if:

- the City of Santa Cruz has a Zoning Administrator on staff who is an expert on the BSD Standards to make a qualified decision.
- the Zoning Administrator and the biologist have thorough knowledge of the BSD Standards to determine the exceptions.

Should this not be the case then the reviewers advise that all exceptions are addressed by a recognized Bird-Safe Design Standard expert.

We trust that you will find this review useful since it addresses the latest research data and includes assessment from BSD Standards experts. The Sierra Club, Dr. Shani Kleinhaus and Mackenzie Mossing are available for further discussion on the topic.

We thank you for the chance to present our findings and are looking forward to your response.

Sincerely,

Gillian

Gillian Greensite, Chair  
Sierra Club, Santa Cruz County Group

Let's avoid this with BSD Standards!



dead Common Yellowthroat.