

From: [Martha Silver](#)
To: [Martha Silver](#)
Subject: Agenda Item 10b: Priority Conservation Area App - Petaluma River Park
Date: Monday, August 25, 2025 12:04:05 PM

From: Susan Kirks
Sent: Sunday, August 24, 2025 2:54 PM
To: MTC-ABAG Info <info@bayareametro.gov>
Cc: Fred Castro <fcastro@bayareametro.gov>; Kate Lyons <klyons@bayareametro.gov>
Subject: Priority Conservation Area App - Petaluma River Park

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August 24, 2025

Dear Ms. Lyons,

I understand ABAG has received or will receive an application from the Petaluma River Park Foundation and the City of Petaluma, to designate a park, adjacent property to the park purchased to develop, and, rather oddly, the Petaluma River and a Safe Routes to School segment of the requested PCA designation..

I oppose this application and do not believe this constructed application merits consideration as a Priority Conservation Area. The application is self-motivated from the Petaluma River Park Foundation and appears also to be an action to promote opportunities for other grant funding, rather than being a strong environmental area that would merit protection.

If the City of Petaluma and community groups are interested in understanding environmental areas that could merit Priority Conservation Area designations, then a comprehensive understanding of the Petaluma Valley where the City of Petaluma exists and relevant environmental areas need to be undertaken. The City of Petaluma is currently engaged in a General Plan Update process, but input from environmental experts to that process has been generally ignored, in favor of the politically popular information. The Environment and Natural Systems section of this Update is woefully inadequate with inaccurate information. I would not be surprised to see the City Council move through a process to approve the Update, with the inaccurate and incomplete information.

The Petaluma River is a tidal slough, the northernmost area of the San Francisco Bay Estuary. Conservation efforts related to the Petaluma River have been minimal, if at all, compared to promotion of recreation and human encroachment into sensitive areas. The City ignored input about a longstanding migratory Cliff Swallow nesting colony under the Petaluma River Bridge in south Petaluma and submitted a grant

application for trail funding directly beneath this nesting area. That application was denied at the State level and at the Regional level. The City staff do not listen to input about federal and state regulatory requirements related to nesting birds and only began complying somewhat with these regulations after I brought a CDFW Warden to the City Parks Department to explain the requirements. Thus, over many many years, the City and its contractors have mowed down active nests and killed birds, without any regard whatsoever for the environment or the delicate life in migratory nesting areas of the Petaluma Wetlands.

The Petaluma Wetlands in the southern part of Petaluma, adjacent to the Petaluma River, received a designation of Ramsar Wetland of International Importance in 2018. How did this occur? It certainly was not as a result of City of Petaluma action. I initiated the application, completed the application and mapping with GreenInfo Network, funded the application, and handed it to the City of Petaluma staff to submit for consideration. This was the City's only action in this entire process. From 2014 to 2018, I then regularly followed up with the San Francisco Bay Joint Venture to press for the application to be submitted and recognized by the USFWS. Finally, in 2018, the designation became official. This was achieved via the auspices of Madrone Audubon, an organization I led for many years. To this date, the City of Petaluma has never acknowledged or expressed one word of gratitude for all of the effort given toward true environmental protection and recognition achieved for the Petaluma Wetlands properties. Not requested as a Priority Conservation Area, the Petaluma Wetlands would definitely merit such an application. Typical the City of Petaluma's insensitivity, the City constructed a large concrete pad stage with metal benches to seat up to 50 people in an area of part of the Petaluma Wetlands that is proximal to longstanding ground nesting bird habitat and foraging area for shorebirds - to be a "gathering" place for people and a place to educate students. This sends a message to students that they are most important in an environmental park setting - not the birds and organisms that rely on the area for nesting and sustenance. This is the wrong message for young people in the climate crisis. This concrete pad stage and the metal benches were readily approved by the Petaluma City Council, a group of elected officials without environmental awareness, which follows the inadequacy of the City government policies and actions.

Another important area of priority conservation in the Petaluma Valley is the West Hills and urban-rural transition of West Petaluma. Whereas the Petaluma Wetlands are habitat to multiple bird species, including threatened and endangered, the West Hills comprise grassland and an urban-wildland interface with diminishing, critically important grassland, home and movement areas to special status American Badger, a keystone species, along with multiple other local wildlife, raptors and songbirds. The City of Petaluma has caused severe damage to a conserved open space land, the only badger sanctuary in California, with the City's construction actions in habitat causing displacement of an adult female badger from her natal territory. Wildlife corridors in the Petaluma Valley are also important to understand and protect, a reality the City of Petaluma ignores and mischaracterizes by claiming that the Sonoma Valley Wildlife Corridor is adjacent to the City of Petaluma (false).

As someone whose conservation work in Petaluma, Sonoma County and the Bay

Area for 26 years, I have been engaged in advocacy and action to protect the environment in the Petaluma Valley and the North Bay Area. We have wildlife who are desperate to remain in their habitat, forage for prey and find water to survive. Of course, obtaining funds to purchase a part of the McNear Peninsula and make that into a high-access for people park and to purchase an adjacent property to add housing and purport to "restore" habitat is admirable. But, this area is not critical for habitat in the Petaluma area and the effort to add Petaluma River and Safe Routes to School as part of the application does not add merit to the application. If we are going to consider Priority Conservation Areas, these need to be truly areas in need of conservation as a priority. As for the Petaluma River, the tidal slough, the Petaluma City Council just approved a large townhouse complex near the banks of the Petaluma River after a very strong community effort to conserve the same land along with other acreage in the north river area.

The Safe Routes to School segment of the River Park's PCA application is also odd and appears to be an effort to boost the application into a transportation related area. The City's Active Transportation Plan has resulted in bike lanes on busy streets that are not safe and, frankly, few parents would say good bye to a child going to school, riding a bike in a bike lane on a Petaluma street. Such a segment also does not relate to the Petaluma River Park.

The City of Petaluma is not racially diverse and changes in that reality are not occurring. The City's racial composition is primarily white, uppder middle class and upper class white, with a small percentage of Latino/a and Hispanic residents, and a minute percentage of other racial groups. We see quite a bit of promotion of "diversity and equity" but the reality is far from the exaggerated public relations of the City government. Even a building for housing that incudes some low income and very low income units will not change the City of Petaluma known lack of racial diversity.

It is my impression the Petaluma River Park application to ABAG, with the City of Petaluma jumping on board to be a "partner" attempts to create a so-called conservation area that would appear to have components in several of the PCA considerations. This is a fabricated circumstance, however, and this small peninsula "park" with adjacent land that will be developed at some point in the future,, and added segments to attempt to enhance the application.

While I can appreciate an effort to obtain a PCA, this application, without any question, does not merit such a designation by ABAG. Habitat and natural resources are minimal, and in the Petaluma Valley where this park exists, many more areas are in dire need of conservation and ongoing protection to help species and their habitats survive.

The Petaluma River and Safe Routes to School additions to this application are both inappropriate and unrealistic in terms of how community members in Petaluma live and care for their families and each other.

I understand politics and other influences normally comprise decisions of government entities. I do not expect my comment to be influential, unless committee members

and Board members are interested in decisions that are based more in reality as compared to PR and questionable reasons for requesting a PCA designation. My interest is actual conservation to support natural resource protection, enhancement and harmony. If a real evaluation of natural resources and other facets of a greater community occur, decisions from that approach will build upon each other to contribute to Bay Area quality of life for all.

Sincerely,
iSusan Kirks
Naturalist
Chair of Board, Paula Lane Action Network (PLAN)
Past President, Madrone Audubon, Sonoma County