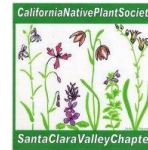




COMMITTEE FOR
GREEN FOOTHILLS



November 23, 2011

Dear Representatives of the Local Partners, USFWS, DFG, and Habitat Plan Staff:

Habitat Conservation Now and the environmental organizations that comprise HCN appreciate the opportunity we had on September 9 to discuss the Santa Clara Valley Habitat Plan and its future direction. As we stated in the meeting, we have generally been supportive of the process over the years, including putting significant effort into obtaining the final funding necessary for these last stages of planning. While all the organizations reserve the right to review a “final” draft Habitat Plan and any subsequent approval decisions, we continue with our hope and expectation that the Plan can provide guidelines, and fund adaptive management programs to protect endangered species and their natural environment in Santa Clara County for decades to come.

We continue to believe that there remains room for improvement in the plan components that we discussed on September 9th. Below we discuss wildlife movement linkages and the Habitat Plan map in the August 31 “Proposed Revisions” document in relation to the Coyote Valley, where we believe there are opportunities to move the discussion forward from the issues discussed last month. We also raise important opportunities regarding ranching, as a follow-up to our own ongoing discussions with the cattle ranching community.

We ask that the Local Partners, the wildlife agencies, and Habitat Plan staff consider ways to incorporate the three main suggestions below into the revised Plan. HCN remains well aware of the financial constraints that the Plan faces. These suggestions may have an impact on those finances, but could be a dramatic improvement in the Plan if adopted.

I. Incorporating acquisition opportunities for wildlife movement corridors in the Habitat Plan’s Adaptive Management plan

The revised Habitat Plan acknowledges the existence and importance of the east-west wildlife movement linkages in the Mid-Coyote Valley and Pajaro River areas, but the Plan does not propose purchasing or securing land to facilitate or protect wildlife movement in those geographical areas. The reasoning we have been given is that in both areas the land and easements are too expensive to purchase, and that the City of San Jose is only open to land use designations in Coyote Valley that facilitate wildlife connectivity without yet having committed to that land use. We ask that an Adaptive Management process be used to revisit and reevaluate these assumptions.

The Habitat Plan’s adaptive management section should explicitly state that if at any time during the 50 year term of the Plan it becomes financially feasible to purchase land or easements along the Pajaro or in Coyote Valley to forestall incompatible development or to otherwise

improve connectivity, then that should be considered. Similarly, the adaptive management section should expressly state that because improving wildlife connectivity in mid-Coyote Valley is not expressly in conflict with San Jose and Santa Clara County's land use designations for that area, then the Habitat Plan implementation should consider protecting and improving that connectivity.

Please note that we disagree with the staff interpretation of the San Jose revised General Plan as not committing to protecting connectivity in Mid Coyote Valley. It is our interpretation (as stated in the following section of this letter) that the new General Plan includes a commitment to protecting wildlife linkages that can be identified. If the Habitat Plan identifies wildlife linkages, something we consider already accomplished, then the Habitat Plan ignores San Jose policy if it fails to attempt to protect those linkages. Even if San Jose staff continues to insist the General Plan "only expresses openness" and no commitment, then the use of the land for enhancement and protection of wildlife movement should be considered in an adaptive management process for Mid Coyote Valley.

Adaptive management should be based on an iterative process to evaluate assumptions, reinforce things that are done right, respond intelligently when something goes wrong, and react dynamically if and when opportunity presents itself. We suggest that the Habitat Plan expressly include Pajaro and Coyote Valley wildlife movement areas for these reasons.

II. Modifying the Habitat Plan map designation for Mid-Coyote Valley

The Habitat Plan map designation for Mid-Coyote Valley was discussed during the telephone conference meeting between Local Partners, wildlife agencies, and the environmental stakeholders on September 9. San Jose staff expressed opposition to differentiating between North Coyote and Mid Coyote even though the City's new General Plan does differentiate between those areas in the following policy:

ER-7.5 Support the on-going identification and protection of critical linkages for wildlife movement in the Mid-Coyote Valley.

The San Jose staff interpretation is that this is not a commitment to protection of critical linkages. We disagree and believe that wildlife movement does occur there, has already been identified as occurring there, that further work on identifying linkages will substantiate and confirm the existing information, and that the linkages must be protected. The new General Plan indicates no urban development in Mid-Coyote Valley for the next 30 years; the draft Habitat Plan assumes this will continue for 20 additional years. Wildlife agency staff stated in the phone conference that recognition of the difference between Mid Coyote and North Coyote should be expressed in the Habitat Plan.

We believe the "Proposed Revisions" map should be changed to include Mid Coyote Valley as one of the priority levels for land acquisition. This action would also remove the false equivalence between Mid and North Coyote. **Failing that, the map should at least include a footnote or asterisk expressly identifying Policy ER-7.5, and state that implementation and**

further development of this Policy by San Jose, in cooperation with Santa Clara County, could result in a change of designation and potential acquisition priority for Coyote Valley.

On the Map, arrows indicating wildlife connectivity show east-west movement only at the Tulare Hill area. We ask that the maps show the Pajaro and Mid-Coyote Valley movement linkages as well. If the purpose of the arrows is only to identify those wildlife linkages that the Habitat Plan seeks to protect rather than generally identifying known and possible wildlife linkages, then the map should expressly state as much. However, we prefer to have a map that identifies all linkages, including wildlife linkages through Coyote Valley and the Pajaro watershed. Text can be associated with the map to identify which ones the plan currently seeks to protect and which ones may be postponed for future examination in an adaptive management process.

III. Maximizing efficient use of grazing as a habitat management tool

Representatives of HCN have recently met with Sheila Barry and Kyle Wolfe, representing the cattle industry in Santa Clara County, and have reviewed their proposed changes to the Habitat Plan. We understand that they have concerns that there may be, now or during the lifetime of the HCP, economic and logistic challenges to grazing within the Reserve framework that will be developed.

Much of the land that the Habitat Plan aims to protect and manage is rangeland. HCN recognizes that livestock grazing can be a useful tool for the management of habitat for endangered species. We also recognize that grazing can have negative impacts to native ecosystems if not carefully planned, monitored, and regulated. We recommend that the Habitat Plan maintain language that would support the use of livestock where grazing can advance the persistence and recovery of threatened and endangered species, but would not support it where benefits to listed species are unlikely and other resources could be degraded.

We support flexibility in the use of funding for all methods of vegetation management. This should include livestock grazing if site-specific management plans indicate that grazing would be the most efficacious tool available to achieve desired results, and grazing conditions are too restrictive to be profitable for the livestock operator. We also support the implementation of a reiterative adaptive management process that would include:

- a) monitoring and evaluating the success of grazing plans and other vegetation management tools in fulfilling conservation goals;
- b) assessment of the value and impacts of supportive infrastructure (fences, roads, water sources) in maintaining lands for grazing (where grazing is found to be beneficial for targeted species);
- c) periodic reassessment of the underlying assumptions, monitoring, and vegetation management plans to guide allocation of funding for vegetation management.

We hope that the Habitat Plan's implementation agency is successful in working with the ranching community in a way that best utilizes grazing as one of the vegetation management options to facilitate the fulfillment of the Plan's conservation goals.

Conclusion.

We urge all parties involved in the Habitat Plan to consider and adopt these suggestions, none of which add to the financial costs but all of which add to the environmental benefit of the Habitat Plan. Please contact us with any questions.

Sincerely,
Undersigned Habitat Coalition Now partners:

Greenbelt Alliance
California Native Plant Society Santa Clara Valley Chapter
Committee for Green Foothills
Santa Clara Valley Audubon Society
Sierra Club Loma Prieta Chapter
Thrive! Morgan Hill