

From: [REDACTED]
To: [Architectural Review Board](#)
Cc: [Kallas, Emily](#)
Subject: PUBLIC HEARING / QUASI-JUDICIAL. 800 San Antonio Road [23PLN-00010]
Date: Tuesday, March 5, 2024 11:56:17 PM

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Dear Architectural Review Board

Regarding the ARB Staff Report #: 2312-2392, on Page 36 it's stated, "Staff also notes that the plans do not currently provide sufficient information to show compliance with the City's Tree Protection Ordinance and no net loss of canopy requirements." Since South Palo Alto is sufficiently below the average canopy coverage of Palo Alto for Canopy to have a tree planting program to improve the canopy coverage, "no net loss of canopy requirements" seems insufficient. The canopy coverage target for the project should at least match the goal for South Palo Alto – If not, how will the goal for South Palo Alto be met. Explicit goals and timelines should be set.

Sadly, it seems that other than the front setback areas (which may soon become bike lanes) there's little natural ground surfaces. Ok, perhaps for downtown areas but disappointing for residential neighborhoods.

Regards,
John Petrilla
[REDACTED]
Palo Alto, CA 94303

From: [Kaitlyn Parkins](#)
To: [Architectural Review Board](#)
Cc: [Raybould, Claire](#); [Kleinhaus, Shani](#)
Subject: Bird Safe Design Ordinance
Date: Wednesday, March 6, 2024 5:44:01 PM
Attachments: [Parkins_PaloAlto_20240307.pdf](#)

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Dear members of the Architectural Review Board,

My name is Kaitlyn Parkins, M.S., and I am the Coordinator of the Glass Collisions Program for American Bird Conservancy, writing in support of a Bird Safe Design ordinance to protect birds in Palo Alto.

American Bird Conservancy is dedicated to conserving wild birds and their habitats throughout the Americas. We work to prevent bird-window collisions by educating architects, building developers, and residents on how to make buildings safe for birds, creating resources for policy-makers and advocates, and we have developed a testing and rating system for bird-friendly materials.

Birds are an integral part of our ecosystems; we depend on them. Birds disperse seeds, restoring our forests after wildfires, they eat insects that destroy crops and spread disease, and they pollinate plants we rely on. Millions of people love to watch birds- close to home and afar. But, according to a 2019 study, we've lost one in four birds since 1970, and the man-made environment is a significant hazard that continues to contribute to these precipitous declines.

Collisions with windows are a major source of bird mortality in the US, killing up to one billion birds every year. Collisions affect rare and common species alike. Birds collide with buildings year-round: during migration when they stop over to rest and refuel, during the breeding season while they are raising chicks, and during the winter when they flock to the bird feeders in our yards. Collisions occur across urban, suburban and rural locations; anywhere birds and buildings coexist, collisions are a risk.

Architectural features like reflective glass, transparent see-through glass, green roofs, atriums, skywalks, and large expanses of glass can all increase collisions. Additionally, proximity to nearby forests, and trees and vegetation directly next to buildings can increase collisions. Birds use rural forests, suburban forests and meadows, and urban parks, street trees, and even tiny patches of urban green spaces as habitat, and they move between those habitats through a maze of extensive man-made infrastructure. Requirements for bird-safe design should encompass all of the habitats birds use, and the spaces between them through which they move.

While window collisions are often associated with tall buildings and urban centers, a Smithsonian study conducted in 2014 found that 44% of collisions take place at residences (1-3 stories), and 56% take place at mid-rise buildings from 4 to 11 stories. With nearly half of all collisions taking place at

residences, and more than 99% at buildings under 11 stories, it is imperative that birds are protected across all building types.

Fortunately, bird-friendly design does not require trading off the beautiful views and sunlight provided by glass. Avoiding the use of hazardous features, such as large expanses of glass, reflective glass, skywalks, glass corners, and glass corridors can reduce the number of collisions at a building without requiring special materials to be used. If those features must be incorporated, bird-friendly materials should be used.

With the passing of legislation in major cities such as NYC and Washington, DC, the market of available products has increased exponentially in recent years, with a multitude of design options and price points. Additionally, many of these products overlap with features of sustainable design, especially those related to solar gain, glare reduction, and security.

Bird-friendly buildings are desirable and beautiful buildings, and architects have been designing them for years without even knowing it. It is critical, however, that the elements of bird-friendly design be considered at the beginning of the design process and carried through to a building's completion. Legislation is the only way to assure this will happen.

ABC recommends ensuring that birds are protected in the City of Palo Alto, by developing an ordinance to guide robust building standards that reduce hazards to birds and require bird-friendly materials. Please find my full letter of support for such an ordinance attached.

Sincerely,

Kaitlyn Parkins
Glass Collisions Program Coordinator
American Bird Conservancy

CONNECT WITH AMERICAN BIRD CONSERVANCY
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March 6, 2024

Kaitlyn Parkins, on behalf of American Bird Conservancy in support of a Bird Safe Design ordinance to protect birds in Palo Alto

I am Kaitlyn Parkins, M.S., Coordinator of the Glass Collisions Program for American Bird Conservancy (ABC) and I have studied and advocated for the prevention of bird-window collisions for over ten years. American Bird Conservancy is dedicated to conserving wild birds and their habitats throughout the Americas. We work to prevent collisions by educating architects, building developers, and residents on how to make buildings safe for birds, creating resources for policy-makers and advocates, and we have developed a testing and rating system for bird-friendly materials.

Birds are an integral part of our ecosystems; we depend on them. Birds disperse seeds, restoring our forests after wildfires, they eat insects that destroy crops and spread disease, and they pollinate plants we rely on. Millions of people love to watch birds- close to home and afar. But, according to a 2019 study, we've lost one in four birds since 1970¹, and the man-made environment is a significant hazard that continues to contribute to these precipitous declines.

Collisions with windows are a major source of bird mortality in the US, killing up to one billion birds every year². Collisions affect rare and common species alike. Birds collide with buildings year-round: during migration when they stop over to rest and refuel, during the breeding season while they are raising chicks, and during the winter when they flock to the bird feeders in our yards. Collisions occur across urban, suburban and rural locations; anywhere birds and buildings coexist, collisions are a risk.

Architectural features like reflective glass, transparent see-through glass, green roofs, atriums, skywalks, and large expanses of glass can all increase collisions^{3,4,5}. Additionally, proximity to nearby forests⁶, and trees and vegetation directly next to buildings^{7,8,9,10} can increase collisions. Birds use rural forests, suburban forests and meadows, and urban parks, street trees, and even tiny patches of urban green

¹ Rosenberg KV, Dokter AM, Blancher PJ, Sauer JR, Smith AC, Smith PA, Stanton JC, Panjabi A, Helft L, Parr M, Marra PP. 2019. Decline of the North American avifauna. *Science*. 366(6461):120-4.

² Loss, SR, T Will, S Loss, and PP Marra. 2014. Bird-building collisions in the United States: Estimates of annual mortality and species vulnerability. *Condor* 116:8-23.

³ Riding Corey S., O'Connell Timothy J., Loss Scott R. 2020. Building façade-level correlates of bird-window collisions in a small urban area. *The Condor* 122(1):duz065.

⁴ Elmore, J.A., Hager, S.B., Cosentino, B.J., O'Connell, T.J., Riding, C.S., Anderson, M.L., Bakermans, M.H., Boves, T.J., Brandes, D., Butler, E.M. and Butler, M.W. 2021. Correlates of bird collisions with buildings across three North American countries *Conservation Biology* 35: 654-665.

⁵ Hager, S.B., H. Trudell, K.J. McKay, S.M. Crandall, and L. Mayer. 2008. Bird density and mortality at windows. *Wilson Journal of Ornithology* 120(3):550-564.

⁶ Żmihorski, Michał, Dorota Kotowska, and Ewa Zyśk-Gorczyńska. 2022. Using citizen science to identify environmental correlates of bird-window collisions in Poland. *Science of the Total Environment* 811:152358

⁷ Bayne, E.M., C.A. Scobie, and M. Rawson. 2012. Factors influencing the annual risk of bird-window collisions at residential structures in Alberta, Canada. *Wildlife Research* 39:583-592.

⁸ Borden, W.C., O.M. Lockhart, A.W. Jones and M.S. Lyonn. 2010. Seasonal, taxonomic and local habitat components of bird-window collisions on an urban campus in Cleveland, OH. *Ohio J Sci* 110(3):44-52.

⁹ Brown B.B., L. Hunter, and S. Santos. 2020. Bird-window collisions: different fall and winter risk and protective factors. *PeerJ* 8:e9401 <https://doi.org/10.7717/peerj.9401>

¹⁰ Kummer, Justine A., Erin M. Bayne and Craig S. Machtans. 2016a. Use of citizen science to identify factors affecting bird-window collision risk at houses. *The Condor* 118(3):624-639.

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While window collisions are often associated with tall buildings and urban centers, a Smithsonian study conducted in 2014 found that 44% of collisions take place at residences (1-3 stories), and 56% take place at mid-rise buildings from 4 to 11 stories². With nearly half of all collisions taking place at residences, and more than 99% at buildings under 11 stories, it is imperative that birds are protected across all building types.

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Sincerely,

Kaitlyn Parkins
Glass Collisions Program Coordinator

¹¹ Wood EM, Esaian S. The importance of street trees to urban avifauna. *Ecological Applications*. 2020 Oct;30(7):e02149.

¹² Kang W, Minor ES, Park CR, Lee D. 2015. Effects of habitat structure, human disturbance, and habitat connectivity on urban forest bird communities. *Urban ecosystems* 18:857-70.

¹³ Callaghan CT, Major RE, Lyons MB, Martin JM, Kingsford RT. 2018. The effects of local and landscape habitat attributes on bird diversity in urban greenspaces. *Ecosphere* (7):e02347.

¹⁴ Partridge DR, Clark JA. 2018. Urban green roofs provide habitat for migrating and breeding birds and their arthropod prey. *PLoS One* 13(8):e0202298.

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