



Marin Audubon Society

P.O. Box 599 | MILL VALLEY, CA 94942-0599 | MARINAUDUBON.ORG

February 1, 2016

Jocelyn Drake, Senior Planner
Marin County Community Development Agency
3 501 Civic Center Drive
San Rafael, CA 94903

Re: MARIN CATHOLIC HIGH SCHOOL PROPOSAL FOR LIGHTED FIELDS

Dear Ms. Drake:

The Marin Audubon Society appreciates the opportunity to comment on the application for a Use Permit Amendment and Design Review approval to allow the installation and use of a field lighting system at the Marin Catholic High School football field. The proposed lighting would be used for 514 games and practices annually – more than the number of days in year. It is our recommendation that an Initial Study be required to address the potentially significant adverse impacts that could result from this project.

The Marin Catholic football field is adjacent to the tidal marsh at Hal Brown Park and this marsh is habitat for the endangered Ridgway's Rail and possibly the endangered Salt Marsh Harvest Mouse. Potentially significant impacts to wildlife, particularly the endangered species, need to be addressed. The Initial Study should discuss and evaluate the following:

1. The presence of endangered species and other species in the Hal Brown Park marsh and the potential impacts of the project on these species. Substantial public funding has been spent on this marsh to control invasive cordgrass, primarily to benefit the Rail population. It would be unconscionable for the marsh habitat to be degraded by this project.

Currently, the Rails and other marsh dependent species must deal with temporary diminished habitat due to removal of the invasive cordgrass as well as disturbance from people using the trail and playground that are immediately adjacent to the transition zone habitat of the Rails. The additional noise and lighting could be the trigger that would result in further-reduced habitat viability and consequently to a decline in the Rail population.

It is of particular concern that the use of the lights and the consequent increase of noise from the sporting events would overlap with the beginning of the Rail's breeding season, which is an important time for them to establish pair bonds. Noise can interfere

with Rails' inability to hear mating calls that enable the birds to establish pair bonds necessary for successful breeding and raising their young.

Potential adverse impacts to migratory shorebirds and waterfowl that depend on the marsh should also be addressed.

2. Potential impacts to other birds that use the terrestrial habitats adjacent to and near the field. Surveys should be conducted of these upland habitats to determine use by songbirds, raptors and woodpeckers.

Night lighting can be lethal for birds, particularly during migration. Birds are attracted to lighting causing them to go off course. They can become exhausted, fall to the ground and die or collide with windows or other objects nearby.

We appreciate your consideration of our recommendation and require that an IS be prepared. Thank you.

Sincerely,


Barbara Salzman, Co-chair
Conservation Committee


Phil Peterson, Co-chair
Conservation Committee