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February 9, 2016

Adam Wolff, Director of Planning
Town of Corte Madera Company
300 Tamalpais Drive
Corte Madera, CA 94925

RE: Proposal by Reneson Hotels, Inc., for reconstruction of the Best Western Corte Madera Inn

Dear Mr. Wolff,

ACR owns and manages a system of wildlife sanctuaries in Marin and Sonoma counties. Since the early 1970's, we have conducted scientific research, stewardship of natural areas, and education activities to help ensure the long-term protection of San Francisco Bay area wetlands. We have published numerous scientific articles on the ecology and conservation of herons and egrets (www.egret.org/scientific_contributions), including an annotated atlas of heron and egret nesting colonies in the San Francisco Bay area (Kelly et al. 2006; www.egret.org/atlas).

We are very concerned that the proposed filling and development of the wetland pond area behind the Best Western Corte Madera Inn would destroy a valuable wetland habitat area occupied by a roosting colony of Black-crowned Night-Herons. This species is one of the resident species of colonially nesting herons that depends on the protection of remnant wetlands surrounding the San Francisco Bay, such as the wetland area considered in this proposal. Annual results from the Southern Marin County Christmas Bird Count confirm that the roost site at the proposed development site is actively used by this species. Numerous scientific investigators have demonstrated that this species is an indicator of healthy wetlands (Hothem et al. 2010), and that protecting populations of such species aides effective management of these important habitats. In addition, please consider these concerns regarding the importance of protecting this wetland roosting site:

- Communal roosting sites provide important functions needed by herons, including enhanced foraging access and efficiency, thermoregulatory benefits, and reduction of predation risk (Beauchamp 1999).
- Wetland habitat in the San Francisco Bay Area is regionally and globally important for several species of wading birds—including Black-Crowned Night-Heron (Mikuska et al. 1998, Kelly et al. 2007).
- Although the loss of a single roost site is unlikely to have an acute negative impact on local or regional Black-Crowned Night-Heron abundances, the protection of individual sites such as this one contributes to a valuable variety of habitat alternatives needed to ensure the persistence of these

birds in the region. Together, the protection of individual roosting sites allows birds to adjust to varying levels of predation pressure and disturbance, unpredictable changes in weather, and increasing water levels associated local flooding and sea level rise. Therefore, the loss of any active Black-crowned Night-Heron roost represents the incremental loss of valuable habitat that may contribute to cumulative impacts over more extensive areas of the San Francisco Bay area.

- To our knowledge, the scientific literature on herons or egrets does not provide any evidence that can substantiate an effort to successfully translocate a roosting site or, similarly, that can justify appropriate mitigation for the loss of a roosting site.

We urge you require full protection of the valuable wetland habitat and pond area used by Black-crowned Night-Herons behind the Best Western Corte Madera Inn. Thank you for considering this comment.

Sincerely,



John P. Kelly, PhD
Director of Conservation Science



Scott Jennings
Avian Ecologist

References cited

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- Kelly, J.P., Etienne, Katie, Strong, Cheryl, McCaustland, Mark and Parkes, M.L., 2006. Annotated atlas and implications for the conservation of heron and egret nesting colonies in the San Francisco Bay area. Audubon Canyon Ranch, Stinson Beach, CA, 94940, p.236.
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- Mikuska, T., Kushlan, J.A. and Hartley, S., 1998. Key areas for wintering North American herons. *Colonial Waterbirds*, pp.125-134.