



November 11, 2025

City of Mountain View City Council
City Hall, 500 Castro Street
PO Box 7540
Mountain View, CA 94039-7540

Re: Biodiversity & Urban Forest Plan (Draft)

Dear City Council Members,

Mountain View's [Biodiversity and Urban Forest Plan \(BUFP\)](#) is a landmark opportunity to weave nature, climate, and livability into a unified citywide framework. GreenSpacesMV consists of volunteers who are primarily Mountain View residents and direct stakeholders in what happens in our city. We appreciate the opportunity to comment on the Draft BUFP. Broadly, we are happy with the plan's direction and acknowledge the significant work by staff, the consultant team, the Parks & Recreation Commission (PRC), the Environmental Planning Commission (EPC), and community members. We strongly urge you to clarify and enhance the BUFP around 1) Implementation and Accountability, 2) Nature as Core Infrastructure, 3) Biodiversity as the Foundation of Forest Health, and 4) Prioritization, Integration, and Partnerships.

1. Implementation and Accountability

While the Draft BUFP is ambitious and visionary, it lacks a clear implementation roadmap. The actions are largely conceptual, without defined timelines, funding sources, or accountability mechanisms. As a result, the BUFP risks being aspirational rather than actionable—a visionary document that could end up collecting dust on a shelf. Turning vision into delivery will require a concrete action plan—one that identifies responsible departments, funding sources, metrics, and near-term deliverables. To ensure the BUFP becomes a true City-owned implementation tool, we urge the City to:

1. **Create a dedicated Biodiversity & Urban Forest line item** in the Capital Improvement Program (CIP) to secure consistent funding.
2. **Update all relevant City design and development standards**—including the [Standard Construction Details](#)—to operationalize the BUFP's goals and embed them in capital projects.
3. **Adopt a companion BUFP Implementation Strategy**, reviewed and approved by the Council alongside the BUFP, to provide public oversight of priorities, funding, and timelines.
4. **Assign clear ownership and resources** for each BUFP action by identifying a lead department, partner agencies, estimated costs, and staffing needs, and near-, mid-, and long-term timelines to ensure coordination and measurable progress.
5. **Publish a public tracking dashboard** showing project status, funding, milestones, and outcomes to ensure transparency and accountability.

2. Nature as Core Infrastructure: Connecting Nature to Nature

The BUFP should center nature itself—not only nature’s services to people. At the October 2025 EPC meeting, “Connect Nature to Nature” was cited as a goal; this should be explicitly reflected in the final plan, distinct from “Connect People and Nature.”

Streets and public spaces make up roughly 80% of city land available for public life. Recognizing the urban forest as core civic infrastructure means managing and funding it on par with streets and stormwater systems. The City should formally classify trees and green infrastructure as capital assets within the CIP and asset-management systems and incorporate soil volume and condition tracking into those inventories to ensure long-term canopy health and transparent, sustained investment.

We recommend the following steps to institutionalize this approach:

1. **Create a multi-year operations and maintenance funding pipeline**—similar in concept to [San Francisco’s StreetTreeSF program](#)—to ensure establishment, pruning, and lifecycle management of trees, native vegetation and related green infrastructure.
2. **Form a cross-functional Biodiversity and Urban Forest Implementation Team spanning Parks, Public Works, Transportation Planning, Fire/Environmental Safety, Community Development and the Sustainability team** to coordinate overlapping efforts in climate resilience, public health, and MRP 3.0 compliance. Stormwater retrofit projects can simultaneously function as biodiversity corridors and shade-canopy improvements, enhancing habitat connectivity while protecting residents from extreme heat.
3. **Establish a dedicated Biodiversity & Urban Forest program, funded through a recurring line item in the Capital Improvement Program (CIP)**. Start with a 3% allocation of the Public Works capital budget, increasing to 5-10% over the next decade to expand tree canopy, habitat connectivity, and soil volume citywide across all eligible projects.

Funds should also support:

- **Native-habitat and pollinator plantings on public land** including parks and active transportation corridors (guided by the 7 elements of SFEI’s Urban Biodiversity Framework).
- **MRP 3.0 retrofit projects** where green stormwater design can double as shade canopy and biodiversity enhancement.
- **City’s Street Tree list** update to focus on regionally native tree species.
- **Dark-sky retrofits** on public lighting to reduce glare and protect nocturnal wildlife.
- **Replacement of artificial turf, poured-in-place rubber, and plastic weed barriers** with living groundcover on public land.
- **Strategic undergrounding of utilities with a plan for all streets**
- Protection of existing native trees/canopy **at Cuesta Annex and the Retention Basin.**

2a. Connecting People and Nature

Although the [BUFP](#) includes Goal 1, “*Connect People and Nature*” (pp. 76-77), it focuses primarily on education and volunteerism rather than physical design. The BUFP should go further—guiding how the urban forest connects people to nature through **shade, comfort, and mobility infrastructure** such as tree-lined bikeways, cooler sidewalks, and shaded transit corridors.

To make this goal actionable, we recommend that the City:

1. **Establish clear implementation mechanisms in the *Active Transportation Plan (ATP)*, *Biodiversity & Urban Forest Plan (BUFP)*, and the updated *Parks and Recreation Strategic Plan*.** These plans currently reference each other, creating a circular link without defining how implementation will occur. Each should specify concrete mechanisms—policies, design standards, and funding pathways – for integrating canopy, biodiversity corridors, and thermal comfort improvements into transportation projects.
2. **Reallocate street space for trees, green infrastructure, and safe, comfortable spaces for people through a “road buffet” approach.** Used by Caltrans’ Complete Streets Design team at the [2025 California Active Transportation Symposium Climate and Resiliency plenary](#), the concept reclaims excess asphalt for walking and bicycling facilities as well as for green infrastructure—turning underused roadway into shade, habitat, stormwater features, and inviting places to walk and bike. **A pilot corridor could showcase how this Green Complete Streets approach delivers comfort, biodiversity, and climate resilience within existing rights-of-way (and meets MRP 3.0 retrofit requirements).**
3. **Integrate shade and biodiversity into transportation design.** Where trees are located adjacent to bikeways, walkways, or transit stops, prioritize species that provide shade and support biodiversity while maintaining safe, accessible passage for all users. San Francisco’s [Green Connections](#) project—developed by the Planning Department and referenced in the San Francisco’s [Urban Forest Plan \(2014\)](#)—identifies a network of streets and paths linking parks, open spaces, and waterfront areas to improve safety, walkability, and habitat connectivity.

Mountain View’s BUFP can advance transportation, health, and environmental goals by investing in canopy and biodiversity that enhance thermal comfort, mobility equity, and livability—creating cooler, more inviting streets that attract people and support local businesses. By linking shade, habitat, and placemaking, the City can transform its transportation corridors into destinations that serve both people and the planet.

3. Biodiversity As the Foundation of Forest Health

A resilient urban forest depends on diversity—of **species, structure, and age**. While the “10-20-30” guideline (no more than 10% of one species, 20% of one genus, and 30% of one family) remains a useful baseline, many cities now treat it as a **minimum standard** rather than a prescription. For example, East Palo Alto’s [Urban Forest Master Plan \(2022\)](#) identifies this ratio as a “**practical minimum**” to reduce vulnerability to pests, disease, and other disruptions ([Appendix IV](#)).

Building on that precedent, Mountain View can strengthen its forest resilience and manage its health through these complementary strategies:

1. **Set native diversity targets.** Establish a goal of 50% native tree species for public trees and 100% native shrubs and groundcover to enhance habitat connectivity, water efficiency, and ecological resilience. Use SFEI’s [Re-Oaking the Urban Forest](#) guidelines to identify regionally appropriate species and canopy structures.
2. **Increase functional diversity.** Select tree species with complementary canopy form, rooting depth, and drought tolerance to build climate and pest resilience.
3. **Broaden regional diversity.** Draw from California’s nearly 100 native tree species to maintain a balanced mix of regionally native and climate-adapted trees suited to local soils and hydrology.
4. **Adopt multi-species corridor palettes.** Replace the historic one-species-per-street pattern with corridor palettes that use several compatible species per block. This approach reduces vulnerability to pests, disease, and heat, maintains visual cohesion, and improves seasonal and ecological diversity as climate zones shift.
5. **Monitor and maintain canopy health.** Conduct regular assessments every 3–5 years of species mix, canopy type, and age class to sustain a balanced, climate-ready forest.
6. **Include private trees in data and planning.** Develop and maintain a comprehensive tree inventory that captures both public and private canopy. Use this data to set measurable citywide targets, guide equitable canopy growth, and identify priority planting zones on both public and private land.

4. Prioritization, Integration, and Partnerships

At the EPC meeting, commissioners noted that the draft uses the term ‘priority’ over 160 times. This will cause conflicts without a transparent ordering method. We recommend adopting clear prioritization criteria and scoring—similar to Public Works Transportation models—to sequence projects and reduce friction.

- **Heritage Tree protections.** Strengthen the [Heritage Tree Ordinance](#) (SEC. 32.25) and clarify removal and appeal guidelines—for both public and private projects—to provide predictable standards for applicants and support PRC commissioners in their decision-making. Any proposal to shift final removal authority away from the PRC should receive careful public scrutiny.
- **Policy integration and expertise.** Incorporate by reference the City’s [Shoreline Burrowing Owl Preservation Plan \(2012\)](#) and [Shoreline Wildlife Management Plan \(2023\)](#) to ensure consistency across policies. We also recommend reinstating and expanding a **City Biologist** role to provide in-house expertise for project review, implementation, and biodiversity tracking.
- **Cross-Plan Coordination.** Please clarify how BUFP will affect and be affected by other City plans during review and implementation phases (and vice versa).
- **Biodiversity Ambassadors and Partnerships.** *Action 18* in the [BUFP](#) (p. 89) – “Conduct City-led outreach and partner with local organizations to activate the community in supporting biodiversity and the urban forest in neighborhoods across the city” – proposes partnering with local organizations to activate neighborhoods. GreenSpacesMV stands ready to help through our connections with neighborhood associations and residents. We can support outreach, materials, and community feedback loops.
- **Community incentives and outreach.** All trees distributed for Arbor Day should be natives. Beyond City-led projects, the BUFP should highlight and expand **incentives for property owners** to replace lawns with native trees, plants, and pollinator gardens, and include an education campaign to **reduce rodenticide use**. After adoption, outreach should extend to local landscaping contractors and nurseries—not just via mail and websites—but also through in-store signage so that private work aligns with the Plan’s biodiversity and soil-health goals.

Respectfully,

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