

## DOCKETED

<b>Docket Number:</b>	15-AFC-01
<b>Project Title:</b>	Puente Power Project
<b>TN #:</b>	215607
<b>Document Title:</b>	Email from J. Engel, California Coastal Commission
<b>Description:</b>	Exhibit
<b>Filer:</b>	Matthew A. Smith
<b>Organization:</b>	Environmental Defense Center
<b>Submitter Role:</b>	Intervenor
<b>Submission Date:</b>	1/27/2017 1:05:03 PM
<b>Docketed Date:</b>	1/27/2017

STATE OF CALIFORNIA  
State Energy Resources  
Conservation and Development Commission

In the Matter of: ) Docket No. 15-AFC-01  
)  
APPLICATION FOR CERTIFICATION )  
OF THE PUENTE POWER PROJECT )

**Exhibit No. 4030**

## Brian Trautwein

---

**Subject:** FW: Puente Power Plant in Oxnard Dunes

---

**From:** Engel, Jonna@Coastal [mailto:Jonna.Engel@coastal.ca.gov]  
**Sent:** Thursday, January 26, 2017 4:17 PM  
**To:** Brian Trautwein  
**Cc:** Street, Joseph@Coastal  
**Subject:** RE: Puente Power Plant in Oxnard Dunes

Hi Brian, Here are my answers to your questions:

**1) When you evaluated the site on behalf of the CCC for the 30143 (d) Report and the 9-7-16 Addendum, were the conclusions regarding ESHA based on any onsite focused or protocol-level wildlife surveys? (See e.g., FSA 4.2-22).**

The short answer is "No." Our biological evaluation was based on my observations of the 2.03 acre wetland area during a site visit, the information contained in the PSA and Application for Certification, and information filed by intervenors and commenters on the CEC docket up to the date of our report. Regarding my observations; I was specifically asked to review the jurisdictional wetland determination and conduct a site visit to observe and review the on-the-ground conditions within the 2.03 acre wetland area.

**2) After reviewing Hunt's testimony, does the CCC staff agree with the findings in his report that the site contains ESHA? Please explain your reasoning.**

After reviewing Larry Hunt's testimony, I, Dr. Jonna Engel, CCC Ecologist, strongly agree with his findings that the site supports a 0.52 acre dune swale characterized by coyote bush and mulefat and likely supports an array of sensitive species, including globose dune beetles, California legless lizards, California horned lizards, two-striped garter snakes, northern harriers, white-tailed kites, and other species, , in addition to the 2.03 acre wetland that I observed and confirmed existed on site. My reasoning is as follows:

- The site supports suitable habitat for the species listed above,
- These species have been identified and documented by focused surveys conducted immediately adjacent to the site, and
- No barrier exists to prevent these species from moving on and off the site.

I think that focused/protocol level surveys should have been conducted for these species on the site. I believe that for the reasons listed above, focused/protocol surveys for the species listed above would likely find that they do occur on the site. In previous cases, the Commission has determined that habitats supporting these species constitute ESHA.

**3) After reviewing Hunt's testimony, and the 10-13-16 CDFW letter, do you agree that the site contains a dune swale wetland in addition to the 2.03 acre wetland? Do you agree with Hunt's**

**findings that the dune swale wetland is an ESHA? Please explain the reasoning behind your findings.**

I concur with Mr. Hunt's findings that three distinct southern coastal dune zones occur around and within the existing power plant and proposed project site including southern foredune, a middle-dune zone deflation plain characterized by a flat area interspersed with small dune hummocks and swales, and southern backdunes. While I did not personally visit the area on the site identified by Mr. Hunt as dune swale, his characterization and CDFW's description of the area of sandy substrate supporting mulefat and coyote bush is consistent with the definition of dune swale habitat. As Mr. Hunt accurately states in his testimony, "The Mandalay Power Plant was constructed in what would certainly be considered ESHA today. Coastal dunes are one of the rarest and most sensitive habitat types in California." The CDFW's Natural Diversity Data Base that contains the current status of California's rare species and habitats identifies Southern Coastal Foredues and Dune Scrub as some of California's rarest native habitats with global and state rarity rankings of G2 S2.1 and G1 S1.1 rankings respectively. For the above reasons, I agree with Mr. Hunt's findings that dune swale wetland is ESHA and had I been asked to observe and weigh in on this habitat type I would have recommended that the Commission determine that the dune swale habitat on the project site is ESHA.

Best, Jonna Engel

Jonna D. Engel, PhD  
Ecologist  
California Coastal Commission  
89 S. California St. Suite 200  
(805) 585-1816

**DECLARATION OF**  
Brian G. Trautwein

I, **Brian G. Trautwein**, declare as follows:

1. I am a Staff Environmental Analyst/Watershed Program Coordinator at the Environmental Defense Center.
2. Exhibit 4030 is a true and correct copy of an email that I received from Dr. Jonna D. Engel, Ph.D., Ecologist, California Coastal Commission, on January 26, 2017.
3. I received Ms. Engel's email in the course of my regular job responsibilities.
4. Ms. Engel's email was automatically stored in my Microsoft Outlook Inbox when I received it.
5. I am the custodian of the Microsoft Outlook Inbox where I received Ms. Engel's email.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: 1-27-17

Signed: Brian G. Trautwein

At: Santa Barbara, California