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CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814-5512

February 7, 2002

Mr. Rick Tripp
Project Director
AES Huntington Beach Generating Station Retool Project (00-AFC-13)
21730 Newland Street
Huntington Beach, CA 92646

SUBJECT: Visual Screening Plan (Condition of Certification VIS-2)

Dear Mr. Tripp:

Condition of Certification VIS-2 in the Commission Decision requires AES to implement a visual screening plan at the earliest feasible time, but no later than one year after the start of project operation. Part 1 of VIS-2 requires preparation of a landscaping plan that meets the visual screening objectives specified in the condition. Part 2 of the condition would need to be implemented, if upon review of the landscaping plan it is determined that landscaping alone fails to achieve adequate visual screening. In this scenario, AES would be directed to implement a new visual screening plan, which in addition to landscaping would include architectural screening improvements to enhance the visual quality of the power plant.

In a November 19, 2001 memorandum, staff provided comments on AES's draft landscaping proposal. As stated in the memo, staff did not believe the proposal would meet the objective of VIS-2 to "provide the maximum amount of feasible screening in the shortest feasible period of time," and suggested changes to increase the amount of visual screening. In addition, staff noted that the landscape plan did not include other required elements, including landscaping maintenance and monitoring procedures, an arborist's report, and comment letter from the California Department of Fish and Game. Your January 28, 2002 submittal provided some of the requested information; however, a revised landscaping proposal has not been submitted to the Energy Commission Compliance Project Manager (CPM) for review and approval.

Please submit a revised landscaping plan that meets the objectives and information requirements specified in the Commission Decision to me for review and approval. The revised landscaping plan should incorporate comments received to date from Energy Commission staff, the City of Huntington Beach, and the Department of Fish and Game, as well as incorporate recommendations provided by the arborist retained by AES. In some cases the comments provided by the agencies are in disagreement, so AES should prepare a plan that attempts to accommodate the individual concerns as much

as possible. For instance, VIS-2 requires that the landscaping be designed so that plantings achieve at least 40 feet in height at maturity. However, the Department of Fish and Game recommends using plant species at the power plant site that would not exceed 15 feet in height to discourage perching by predatory birds (raptors). Based on Energy Commission staff's experience in other siting cases the ultimate height of the landscaping is only one criterion in selecting trees that would be unattractive to perching birds. For the Russell City Energy Center (RCEC) Project in the City of Hayward, many of the trees deemed appropriate by the U.S. Fish and Wildlife Service that deter perching by predatory birds grow to a height of 25 to 60 feet (see the attached list). Many of the trees recommended by the U.S. Fish and Wildlife Service have dense foliage that discourages perching by raptors. Two trees suggested for the RCEC project, Karo tree *(Pittosporum crassifolium)* and Brazilian pepper *(Schinus terebinthifolius)*, which both grow to 30 feet tall, are recommended in the Tree Selection Study commissioned by AES as appropriate for the growing conditions at the project site. There may be other trees on the Tree Selection Study list prepared for the Huntington Beach Retool Project that have characteristics unattractive to perching birds, but would grow taller than 15 feet and would be more effective at visually screening the facility. The goal for AES's landscape architect to strive for should be to select trees from the arborist's list that are evergreen, fast growing, and tall (at least 40 feet at maturity), and which have characteristics, such as dense foliage, that are unattractive to perching predatory birds. In addition, the trees should be installed at 24" box size, unless the arborist has recommended a smaller planting size (e.g., trees planted on the sides of berms).

The Department of Fish and Game recommends against the use of invasive non-native species in favor of "locally occurring native plant species." In their December 7, 2001 letter commenting on the proposed landscaping plan, the City of Huntington Beach states that the emphasis of the planting scheme should be on native California species. Monterey cypress (*Cupressus macrocarpa*) and Torrey pine (*Pinus torreyana*), both California coastal natives and both listed on the arborist's list, would provide good visual screening trees, but would unfortunately provide good raptor perches. Catalina cherry (*Prunus ilicifolia* ssp. *lyonii*), a dense shrub native to the Channel Islands off southern California, would provide lower level screening and may not be attractive to perching birds. Coast beefwood (*Casuarina stricta*), carob tree (*Ceratonia siliqua*), rusty leaf fig (*Ficus rubiginosa*), and cow-itch (*Lagunaria pattersonii*), all of which are on the arborist's list, are all non-natives, but appear to have characteristics unattractive to perching predatory birds (e.g., dense foliage, droopy branches). Energy Commission staff agree with the Department of Fish and Game's recommendation to remove the existing myoporum along the southeastern boundary of the power plant and replace these shrubs with plant species that provide a suitable visual screen but are unlikely to invade the adjacent wetlands.

We hope our comments help resolve as many issues as possible regarding the landscaping plan and visual screening of the project. Let me know if you would like to have another conference call to help further resolve any outstanding issues.

Please feel free to call me at (916) 654-4745 if you have any questions.

Sincerely,

Donna Stone
Compliance Project Manager

Enc

Cc: Dale Edwards, Supervisor, Cultural, Visual and Socioeconomics Unit
Eric Knight, Environmental Planner
Rick York, Biologist

Table E-1. Appropriate landscaping trees.

Tree Species	Tree Characteristics
Acacia baileyana Bailey acacia	20-30 feet; round form; closed dense crown
Cercis occidentalis Western redbud	10 to 18 feet; irregular crown; small upright limbs
Cornus florida Eastern dogwood	to 40 feet; irregular shape with fine horizontal branches
Crataegus phaenopyrum Washington hawthorn	to 25 feet; fine limb structure, spreading crown
Cupresses sempervirens Italian cypress	to 80 feet; dense, narrow columnar form; upright fine branches
Feijoa sellowiana Pineapple guava	18 to 25 feet; round to spreading form; dense crown
Fraxinus ornus 'Raywood' Raywood ash	to 60 feet; compact, round-headed crown; generally small narrow limbs
Geijera parviflora Australian willow	25 to 30 feet; domeshaped crown, with small upswept branches
Laurus nobilis Sweet bay	12 to 40 feet; compact, broad-based, multistemmed cone-shaped crown
Liquidambar formosa Sweet gum	to ~~120~~ 40-60 feet; generally dense cone to pyramidal shaped crown
Melaleuca nesophila Pink melaleuca	15 to 20 feet, occasionally 30 feet; irregular to round dense crown; can develop heavy gnarled branches if unpruned, branches generally upright
Pittosporum crassifolium	to 35 feet; dense dome to round crown
Schinus terebinthifolius Pepper tree	to 30 feet; broad, umbrella-shaped crown; dense foliage
Cycas revoluta Sago palm	20 to 25 feet in cultivation; dense foliage