

Hello Joseph,

Below are the Service's comments at this time on the AFC for the Oakley generating station (formerly called Contra Costa generating station). Please let me know if you have any questions.

Thanks,

Angela

DOCKET

09-AFC-4

DATE

RECD. AUG 26 2010

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1. Please consult the East Contra Costa County Habitat Conservancy to discuss covering the Antioch portion of the activities through the HCP as well.
 2. AFC states that spoils will be stored onsite. Need to address burrowing owl issues, and potential for owls to colonize soils while they are temporarily stored onsite (2-33, 5.2-33).
 3. Need to analyze the potential effects of nitrogen deposition associated with this project (on top of baseline level of N-dep) on the Antioch Dunes National Wildlife Refuge (ADNWR) and the listed species present there. Also, AFS stated two different distances to ADNWR (2.25 miles west of site and 1.6 miles west of site), so need to correct this error (5.2-48).
 4. It appears that there will be a lot of construction in grasslands on the project site. Please include an analysis of the effects to species on grasslands (upland), and include any potential additional conservation measures that may minimize or avoid effects to listed species.
 5. The AFC states that 17 transmission line towers will be changed as a result of the project, and that vegetation will be cleared 400 feet around each pole. Many of these towers appear to be in grassland. Please discuss the effects of this work on San Joaquin kit fox, burrowing owl, silvery legless lizard, white tailed kite, etc., and the proposed compensation for these effects.
 6. If temporary effects are going to last for more than one year, they need to be analyzed as permanent effects, and compensated accordingly.
 7. Need CDFG input on wetland issues (5.2-52).
 8. Where is the compensation and protection for San Joaquin kit fox that is mentioned on 5.2-57? Is this through the HCP/NCCP or separate from it?
 9. Need to include a discussion of penalties in WEAP training (5.2-54).
 10. Need to consult with CDFG on effects to burrowing owl. Will 1:1 compensate adequately for effects?

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