

DOCKETED

Docket Number:	12-AFC-02C
Project Title:	Huntington Beach Energy Project - Compliance
TN #:	216661
Document Title:	Cabrillo Wetlands Conservancy Comments Habitat Mitigation and monitoring Plan Request for use of Temporary Parking Lot
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Organization:	Cabrillo Wetlands Conservancy
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Comment Received From: Cabrillo Wetlands Conservancy

Submitted On: 3/22/2017

Docket Number: 12-AFC-02C

Habitat Mitigation and monitoring Plan request for use of Temporary Parking Lot

Additional submitted attachment is included below.

March 13, 2017

California Energy Commission
Dockets Unit
Docket number: 12-AFC-02C
1516 Ninth Street, MS-14
Sacramento, CA 95614

RE: "Docket No. 12-AFC-02C, AMENDED HUNTINGTON BEACH ENERGY PROJECT
Habitat Mitigation and Monitoring Plan Request for use of Temporary Parking Lot

Dear Commissioners,

The Cabrillo Wetlands Conservancy is requesting that adequate mitigation be provided through a Habitat Mitigation and Monitoring Plan (HMMP) prepared for the California Energy Commission that would provide the concepts and direction for implementation and maintenance of the mitigation required to compensate for impacts to California Coastal Commission jurisdictional areas associated with the proposed use of the 3-acre Newland Street vacant, unpaved wetlands parcel designated for a temporary AES parking lot to be used during the tear-down and construction of the AES Huntington Beach Energy Plant.

Using this area for parking could result in up to 10 years of grading, vegetation removal, soil compaction, and other adverse effects that would significantly diminish any wetland functions and values at the site.

This is a historically known Coastal Commission jurisdictional wetlands. See Exhibits A, B and C for views of these wetlands from 1955, 1963 and 1970. Also enclosed are Exhibits D, E, F, and G showing views of ponding and vegetation on the property. Ponding is a wetland indicator and occurs every year for the required number of days.

Additionally, in 1981 the property owner was issued a Notice of Violation by the California Coastal Commission (CCC) for conducting unpermitted scraping of wetland vegetation on the 3-acre Newland Street parcel.

A total of 3.00 ac of potential CCC jurisdiction will be permanently impacted by project activities. At a mitigation ratio of 4:1, 12 ac of habitat creation, restoration, or enhancement would be required to compensate for permanent project impacts.

The proposed property to be restored per this mitigation would consist of the wetlands along Pacific Coast Highway (PCH) from Newland Street to Beach Boulevard where the land is zoned Coastal Conservation (CC). It is currently home to the endangered Belding's Savannah Sparrow, the threatened White Tailed Kite, the Cooper's Hawk, and other permanent resident bird species.

Impacts will be mitigated through the removal of invasive nonnative vegetation on the PCH wetlands, and the site will be installed with a native plant palette soon after the initial removal of nonnative vegetation. Mitigation success will be assessed through performance standards specific to the site for the establishment of seeded and planted species and the exclusion of exotic and ruderal species. Total monitoring requirements will be for an anticipated 5 years or until performance standards are met. As-built, annual, and final monitoring and maintenance reports will be provided.

The drafted HMMP shall describe the site preparation, seed and plant material, installation methods, and maintenance and monitoring required until the performance standards are met.

The work could be supervised by the Cabrillo Wetlands Conservancy, Inc. once a strategic plan is drafted, and then approved and monitored by the CCC.

Sincerely,



Mary Jo Baretich
President, Cabrillo Wetlands Conservancy, Inc.
21752 Pacific Coast Highway Sp. 23A
Huntington Beach, CA 92646
(714) 960-9507



GLENN LUKOS ASSOCIATES

EXHIBIT 6

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EXHIBIT A



GLENN LUKOS ASSOCIATES

Exhibit 6



September 1962

EXHIBIT B



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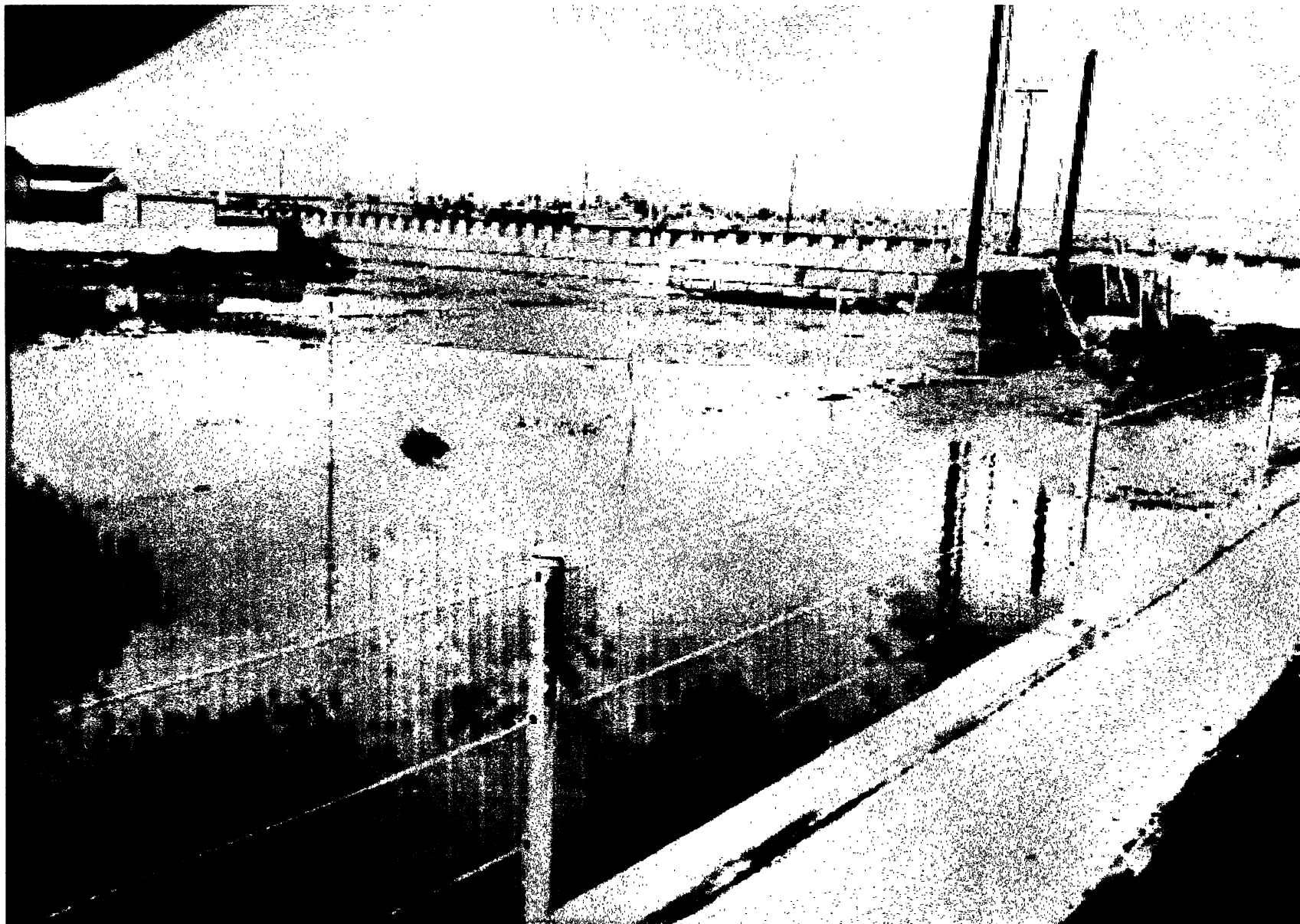
1/27/97 TO

1/27/97 TO 1/27/97

EXHIBIT C



**MILLS NEWLAND PROPERTY - WETLAND VEGETATION 01/30/2010 - NOTICE PONDING -
LAST RAINFALL 01/23/2010
EXHIBIT D**

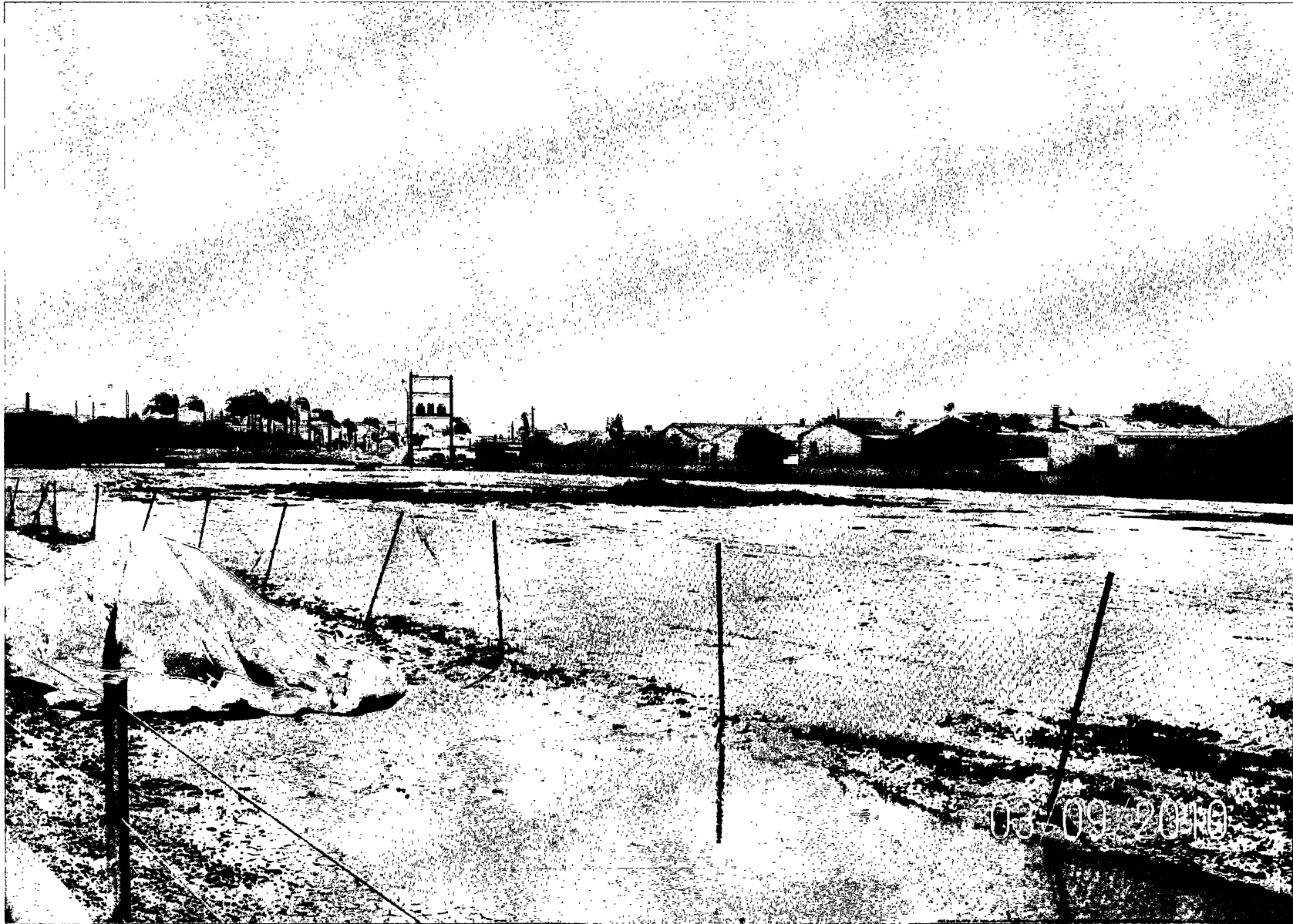


MILLS NEWLAND PROPERTY - WETLAND VEGETATION 02/06/2010 – LOOKING TOWARD CHANNEL

EXHIBIT E



MILLS NEWLAND PROPERTY - WETLAND VEGETATION 02/06/2010
EXHIBIT F



MILLS NEWLAND PROPERTY - WETLAND VEGETATION 03/09/2010 - HEAVY VEGETATION IN CENTER OF WETLANDS. PONDING IN UPPER RIGHT-HAND CORNER.

EXHIBIT G