

## DOCKETED

<b>Docket Number:</b>	15-AFC-01
<b>Project Title:</b>	Puente Power Project
<b>TN #:</b>	205848
<b>Document Title:</b>	Ventura Audubon Society Comments: Nesting Habitat Impacts
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Ventura Audubon Society/Cynthia Hartley
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	8/26/2015 2:54:29 PM
<b>Docketed Date:</b>	8/26/2015

*Comment Received From: Cynthia Hartley*

*Submitted On: 8/26/2015*

*Docket Number: 15-AFC-01*

**Ventura Audubon Society: Nesting Habitat Impacts**

*Additional submitted attachment is included below.*



# Ventura Audubon Society

August 26, 2015

Janea Scott  
California Energy Commission  
1516 Ninth Street, MS-29  
Sacramento, CA 95814-5512  
RE: Docket # 15-AFC-01  
Project Title: Puente Power Plan

Dear Commissioner Scott,

These comments are submitted on behalf of the Ventura Audubon Society and its 750 members in western Ventura County. Ventura Audubon is a chapter of the National Audubon Society, one of 47 chapters in California and more than 450 chapters nationwide. Our mission includes the conservation and restoration of bird populations and wildlife habitat for the benefit of humanity and earth's biodiversity. Audubon began more than 100 years ago in response to the slaughter of millions of water birds, particularly egrets for the millinery trade.

Audubon is a science based organization. Our members have been directly involved in nest monitoring of the federally listed western snowy plover and California least tern for the past 15 years on all Ventura public beaches, including Mandalay and McGrath State Beach. For all of these years we retain detailed data on nesting locations and outcomes. We report data to state and federal agencies and work closely with them to actively implement a species recovery plan.

The mitigation outlined in the Application for Certification is insufficient to protect nesting western snowy plovers and California least terns from the Puente Project. Raptors and corvids are predatory birds that have been documented to kill nesting adults, the young and the eggs of these species. Corvids in particular have been a serious problem at McGrath beach. Abandoned structures serve as nesting and roosting places for these predators. Measures need to be included that would reduce the

possibility that the decommissioned units 1 and 2 would not be used for nesting or roosting sites. The most effective solution would be the complete removal of units 1 and 2.

Furthermore, all of our years of nesting data from Ventura County show that California least terns and western snowy plovers do not nest in front of either the Mandalay or Ormond Beach power plants. These birds utilize the dunes on either side of the plants, but not directly in front. The power plants essentially cast a "nest shadow". The reason for this is unknown. The location of the new unit would be adjacent to nesting habitat that is currently being used by both federally listed species. It is likely that the new unit would impact existing nesting habitat. By leaving the abandoned units 1 and 2 in place it is also possible that the foot print of the nest shadow will expand to encompass the beach fronting all three units. Before the new plant is approved this issue needs to be studied to understand why it is happening to prevent further impacts to nesting habitat. It is also imperative that this phenomena be addressed before making a final decision about the fates of units 1 and 2.

Mandalay and McGrath State Beaches are designated in the USFWS Recovery Plan as "critical habitat" for the western snowy plover. Available nesting habitat for these species is forever threatened by human encroachment throughout Ventura County. Our years of study have shown these birds require that each beach continue to retain stable suitable habitat as a buffer against a fragile future. Threats to nesting areas on Mandalay and McGrath will compromise the success of these listed species throughout Ventura County.

Sincerely,



Cynthia Hartley  
Shorebird Recovery Program  
Ventura Audubon