State of California • The Resources Agency
Arnold Schwarzenegger, *Governor*
DEPARTMENT OF PARKS AND RECREATION
Ruth G. Coleman, *Director*
Orange Coast District
3030 Avenida del Presidente
San Clemente CA 92672
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SEP 2006

September 8, 2006

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Donna Stone, Compliance Project Manager
California Energy Commission
1516 9th Street, MS-2000
Sacramento CA 95814
Fax (916) 654-3882

Subject: AES Huntington Beach Generating Station Retool Project

Dear Ms. Stone:

California State Parks owns and operates 278 park units statewide including Huntington State Beach. We help provide safe, high quality outdoor recreation experiences to millions of visitors each year. While most of our local visitors come to enjoy a day at the beach and a dip in the ocean, some come to view terns at the Huntington State Beach Least Tern Natural Preserve, established in 1972 for this endangered species.

The Natural Preserve annually supports about 10% of the world's population of this species. Western snowy plovers have been known to breed within the tern colony, and they regularly spend the winter on Huntington State Beach. The tern breeding population has been under constant pressure from man's encroachment onto its favored beach habitat near estuaries and river mouths. Other insults have been from dogs, cars, trucks, boats, helicopters, and direct human impacts. Another measured impact has been the "degradation of the foraging habitat of the endangered California least tern, endangered California brown pelican, and threatened western snowy plover," by this project.

Units 3 and 4 entrainment and impingement findings are significant under CEQA guidelines due to impacts to listed species, the reduction of native fish, wildlife and plant habitat, and the significant cumulative impacts on the nearshore environment. Not measured in this study were the affects of heat treating the intake pipe and the direct impacts of cooling water on the ocean environment. These and other multiple, human caused factors as loss of wetlands, point and non-point source pollution, and over-fishing should be combined to assess the impacts on the nearby rare tern colony.

While State Parks feel restored wetlands habitat are of great benefit to the general area, more could be done to help the specific sensitive species involved in this discussion. AES should replace protective fencing to the existing Natural Preserve to provide direct benefit to the species impacted by your project.

If you have questions about our suggested additional mitigation for impacted endangered and threatened species, please give me a call.

Sincerely,

Richard Rozzelle
District Superintendent