From: <Carol_A_Roberts@fws.gov>
To: <mdyas@energy.state.ca.us>
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Subject: Imperial Irrigation District's El Centro Generating Station

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In Reply Please Refer to: FWS-IMP-4754.2

Dear Ms. Dyas:

The Fish and Wildlife Service (Service) has reviewed the Small Power Plant Exemption package provided in support of Imperial Irrigation District's (IID) application for an exemption for the El Centro Generating Station (ECGS) Unit 3 Re-power Project. We have identified the following concerns:

Burrowing Owls (Athene cunicularia hypugea) on the Project Site

The discussion under Impact BIO 3 states that the noise associated with construction will be similar to the ambient noise levels associated with operation of the existing facility and should therefore not disturb the burrowing owl pair on the ECGS site. Have any measurements been taken to confirm that the existing noise levels are similar to the levels anticipated with the proposed construction activities? Also, construction activities such as this frequently involve pile-driving that results in intense vibrations as well as noise. How do the levels of vibration associated with construction compare to ambient levels associated with operation of the existing facility?

As a precaution, the Service recommends that the construction be scheduled outside the typical breeding season (February 1 through August 30) and that the burrowing owl pair using the site be monitored during any construction activities that exceed ambient noise and/or vibration levels as breeding outside the typical season has been known to occur in the Imperial Valley.

Nesting Birds on the Project Site

The discussion under Mitigation Measure BIO 1suggests that the survey effort can focus on species of special concern. However, the Migratory Bird Treaty Act protects a wide range of both rare and common species. Surveys should include any/all nesting native bird species. Prior to any construction or preparation activities, the construction site and all use areas (e.g., parking, materials laydown and storage) with potential nesting habitat should be surveyed for nesting native birds. Any active nests should be avoided with adequate buffers to prevent destruction and abandonment of nests. This avoidance can be facilitated by scheduling construction and related activities outside the typical breeding season.

Please feel free to contact me if you have any questions regarding the Service's concerns. My contact information is provided below.

Sincerely,
Carol A. Roberts

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