

April 14, 2020

Davis City Council
23 Russell Blvd., Suite 1
Davis, CA 95616

Dear Members of the Davis City Council:

In the April 3 edition of the *Davis Enterprise*, members of the Yolo Audubon Board of Directors read with surprise the City's plan to accept a proposal to convert the 235 acres of ponds at the Davis Wastewater Treatment Facility into a commercial solar array. These ponds have been an important migration stopover and wintering spot for birds, particularly ducks and shorebirds, for over forty years. Their loss, due to a change of technology at the treatment facility, is unfortunate.

Of greater concern, however, is the proposal for a commercial solar array to be constructed on the site. While solar energy is a critical component in the battle against climate change, larger arrays in open spaces are notorious bird killers. From a distance, at the right angle, the panels look like a body of water, and attract birds. Upon arriving, birds may crash directly into the panels. This has been documented at facilities using both mirrors and photovoltaic panels. What few studies have been done and made publicly available have revealed an average kill of one bird/acre/year. For the Davis proposal, that could mean 235 birds killed per year.

The city's approval to convert the ponds to a solar development has been without input from the public or any city commission. Yolo Audubon finds this unacceptable and always wants to be consulted on any planned projects that may affect birds in our area. At the very least, approval of this development should include the following elements, with details fleshed out as part of the proponent's need to comply with the California Environmental Quality Act:

1. A monitoring plan to document bird mortality and to estimate actual bird losses (because many birds are scavenged by ravens and coyotes before they are found).
2. A plan to compensate for bird mortality, should it occur above a designated threshold (for example, for every estimated kill above 100 birds, the contractor shall contribute to habitat restoration elsewhere).
3. Should mortality be excessive (to be defined), the contractor shall explore on-site mitigation strategies to reduce mortality.
4. Given the importance of nearby ponds to discourage birds from approaching the solar farm, ponds at the County Landfill and City of Davis Wetland shall be maintained as suitable waterfowl and shorebird habitat as long as the solar panels exist.

We offer our comments now because we are uncertain when the City Council will consider public input in a constructive way, and we want Yolo Audubon's concerns to be part of the public record. Finally, we want to thank Lucas Frerichs for being the lone City Council member to oppose this poorly conceived project.

Sincerely,

Ann Brice, President, on behalf of the Yolo Audubon Board of Directors