

Ventura  Audubon Society

Monday, December 16, 2019

Ormond Beach Project Partners,

Enclosed please find revised comments and recommendations from the Ventura Audubon Society pertaining to the Ormond Beach Public Access Plan, as presented to the public in July of 2019.

We thank the Project Partners for inviting Ventura Audubon to contribute to this process. We appreciate the consideration you have given our past feedback and have noted that many of our suggestions have been incorporated into the preferred alternative plan described in Sections 3.2 and 5.2.1-3 (e.g. bird fencing, bird blinds, raised boardwalks that allow for animal movement, maintenance of adequate distances between public access features and sensitive habitats).

There are still some outstanding concerns we have with the preferred plan. We feel that some of the features displayed on the map in Figure 6-17 do not sufficiently achieve the goal of protecting nesting birds from disturbance and could be improved. We also note there is language in the plan which describe measures that lessen impacts to sensitive species (specifically bird blinds); however, these measures are not reflected in the plan map as shown in Figure 6-17. Our comments address these concerns and provide suggestions for improvements.

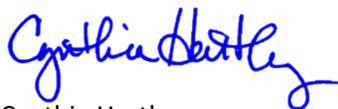
Furthermore, since our recommendations to the draft plan alternatives were submitted in June of 2018, we have experienced 2 additional nesting seasons. During the intervening time we have collected additional data that further informs our feedback. This includes the following:

1. During the last two nesting seasons (2018-2019) there has been an increase in the numbers of snowy plover and least tern nests compared to previous years. There has been a corresponding expansion of nesting area, in particular by least terns. This may represent future habitat use by these species and should be accommodated by the plan.
2. In 2019 we had an increase of homeless encampments near nesting areas, to a degree we have never encountered before on Ormond Beach. Although we hope this will not be a problem in the future, it has been a sobering lesson and we believe this should be addressed in restoration planning.

Enclosed are georeferenced maps of the preferred alternative plan overlaid with nesting and chick data. On map legends "CLT" = Ca least tern and "WSP" = western snowy plover. This will help to illustrate how current nesting patterns could be impacted by the plan.

Please feel free to contact me if there are any questions or discussion relevant to our recommendations.

Sincerely,



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The mission of the Ventura Audubon Society (VAS) is to protect our native bird populations and their habitats, and to facilitate recovery of declining species. The best way of protecting bird species, pushed to the brink of extinction due to human disturbance, is to eliminate disturbance by completely restricting public access. This occurs on military installations, and these locations typically have the largest nesting colonies. We acknowledge this is not a realistic management strategy for the Project Partners and that it contradicts the mission of the Ormond Beach Restoration and Access plan. Therefore, our following comments outline proposed compromises.

Area 7

Our concerns with this location are: 1) A dune trail that bisects nesting habitat, and 2) The trail along the dunes inland of the nesting area.

1. **The dune trail** shown on the preferred alternative plan map cuts through nesting areas. It also impacts habitat used by flightless chicks. See the map in Figure 1A below which shows 2019 nesting overlaid on the proposed restoration. **Our recommendations:**
 - i. No trail through this area is the best option to protect birds
 - ii. Close this trail seasonally during nesting from March-Sept.
 - iii. Relocate this trail south to avoid prime nesting areas. Alternative plans 1 and 3 have a dune trail better placed to avoid nesting areas, further to the south (see inset map 1B)
 - iv. If the trail is not closed seasonally, provide a contingency that it will be closed if nests occur on or near the trail. Include construction of a gate at the end of the board walk to facilitate closure.

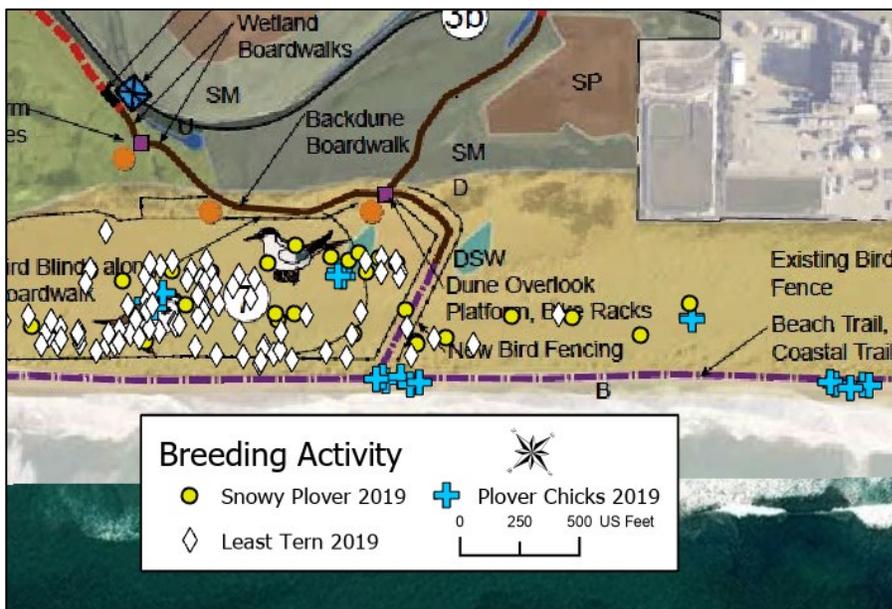


Figure 1A. Dune trail by area 7 bisects sensitive breeding habitat



Figure 1B. Preferred location for dune trail near area 7, from alternative plans 1 and 3

2. **Boardwalk trail on the dunes behind the nesting area (Figure 2A below):** The proposed location for the boardwalk is ill advised. It is shown on top of dunes overlooking the nesting area, which we know to be high and to have complex topography. Construction will be difficult, especially if it is to

be elevated. Even a primitive trail here would damage the dunes. The text description calls for “bird blinds as necessary” (page 6-92), but on the map there is no mention of this feature. The only way to mitigate disturbance to nesting birds would be to construct a bird blind the entire length of the board walk (red circled area on map 2A). There are three overlook areas, one of which has a platform with bike racks; however, bird blinds are not called out. There are two picnic areas in this location which we feel strongly will attract predators and increased human activity. Bike racks in this location would further encourage human traffic. These features are very close to active nesting, less than 100 feet. We know that snowy plovers typically flush from nests if a human approaches 200 feet away, and some birds are even more sensitive than this. Nesting birds should not see human heads and bodies standing out above dunes. A boardwalk overlooking this area would be very disruptive.

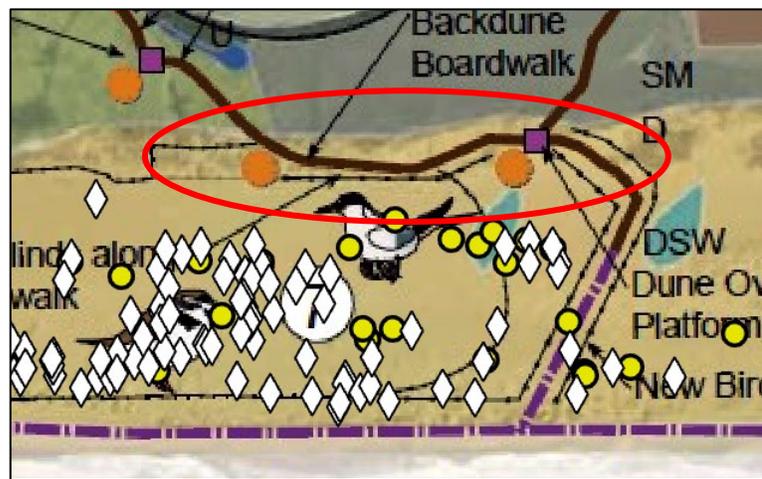


Figure 2A. Board walk trail inland of nesting area

Recommendations. See Figure 2B, right:

- i. Retreat this trail further inland so that it is A) not on top of the dunes, and B) not so close to nesting areas (red arrow ).
- ii. Move all picnic areas, trash cans and bike lockers at least 1,000 feet inland, away from the nesting area. A good location would be at the end of the ADA trail (pink circle ). This is 1000 feet from the nesting area. Include control language to include tightly sealed trash cans.
- iii. Overlooks need to have bird blinds.

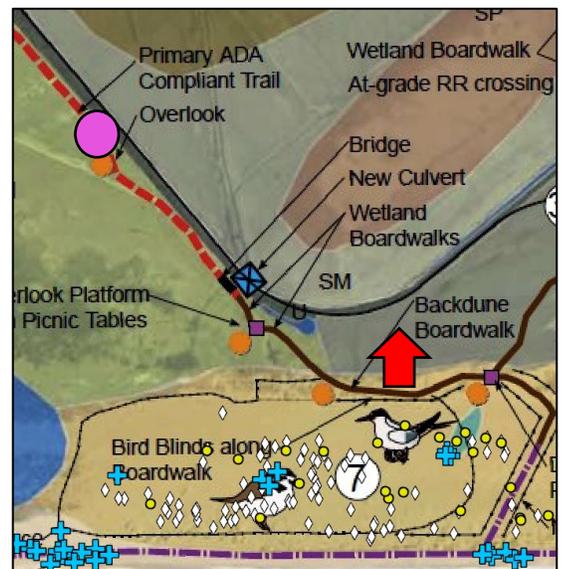


Figure 2B. Recommended changes to area 7 board walk trail and amenities

Area 1 Trail

The trail that leads through the dunes from the bridge over Ormond Lagoon at Perkins Rd and goes south towards the nesting area will undoubtedly experience much higher human foot traffic than it currently does. This will impact nesting least terns and snowy plovers. The young of these species naturally gravitate to the tideline to forage and learn to fly, we document chicks in this location every year (blue crosses in Figure 3 below). In past years we have had nests of both species in the same location as the proposed trail, see figure 3B which shows all years of nesting overlaid on the preferred plan.

Recommendations. See Figure 3, below:

1. Close this part of the trail during nesting season. If the trail is not closed in nesting season, close the trail if nests are found in the area.
2. Establish a line of post and cable symbolic fencing along the lagoon. This will provide a place of refuge for chicks where they can have a safe place to retreat. This can be taken down outside of nesting season. See the dotted line red line (.) in Figure 3 below.
3. Construct temporary fencing around nests and areas where chicks are found.

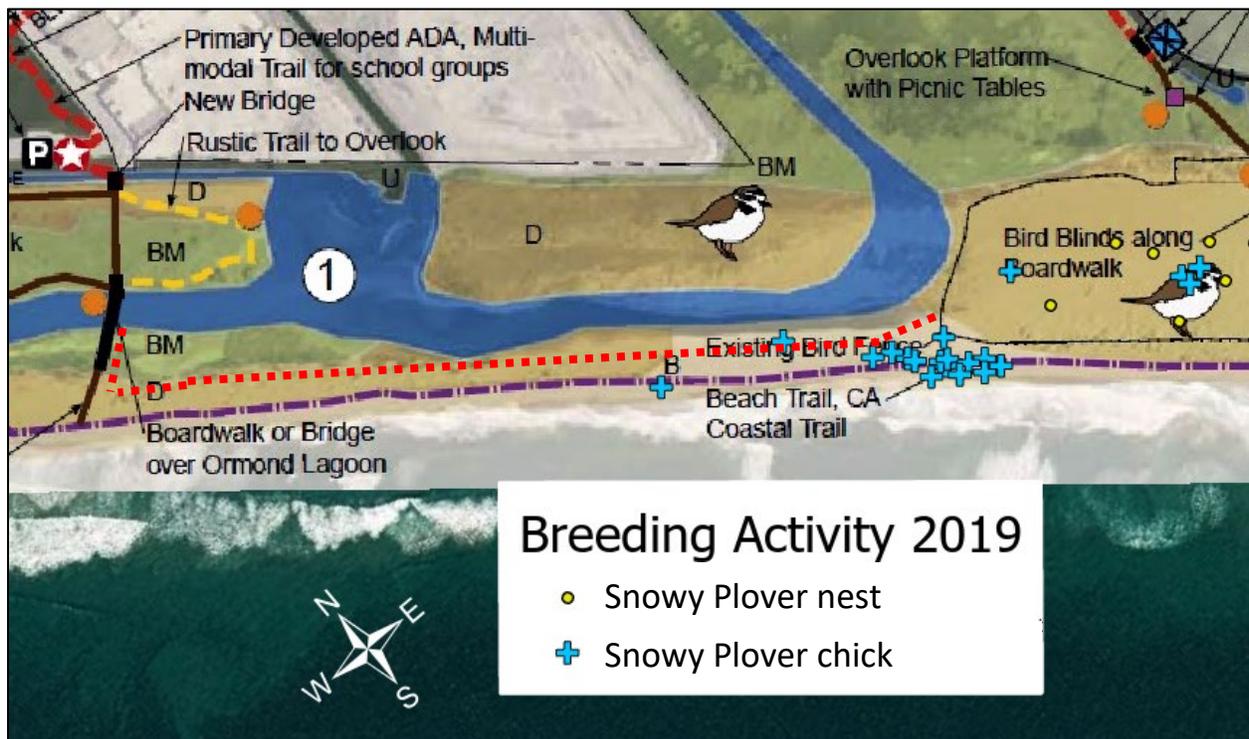


Figure 3A. Tideline adjacent to Ormond Lagoon

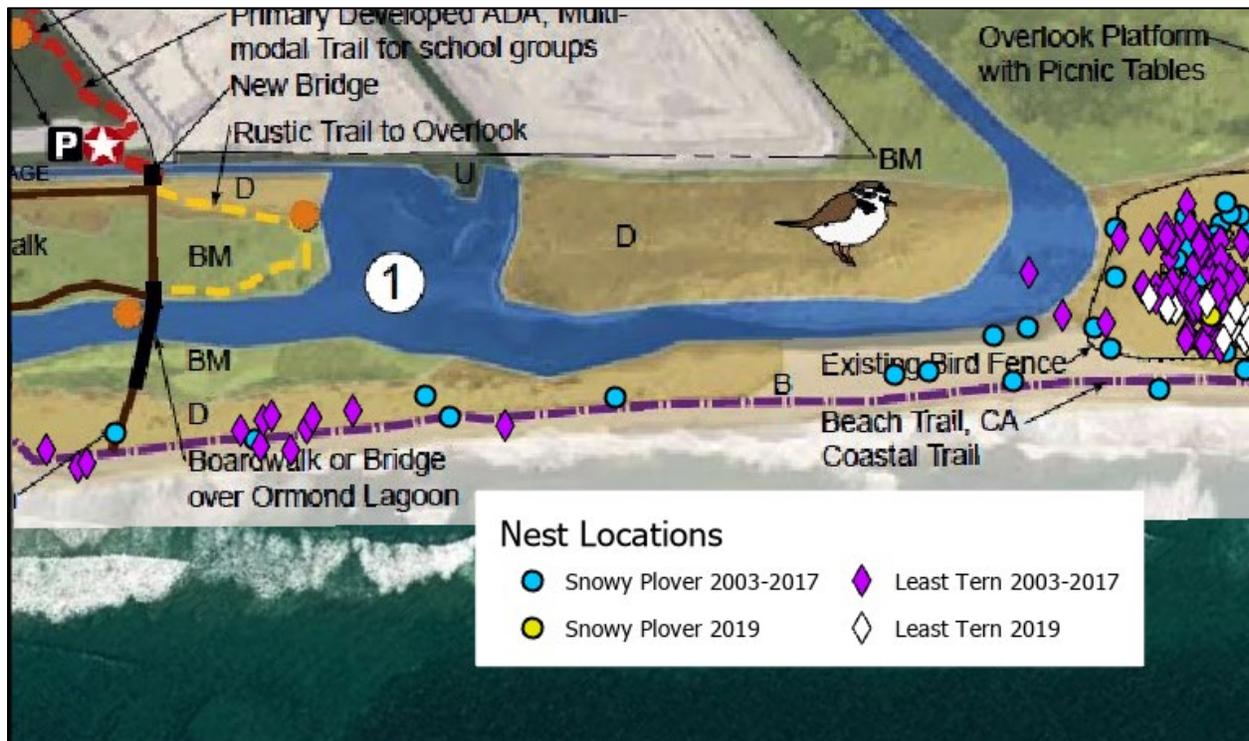


Figure 3B. Area 1 with all years of plover and tern nesting displayed

Areas 6 and 9

Because this area has reduced access compared to the northern end of Ormond Beach, we see fewer conflicts with nesting birds. Seasonal closures need clarification and perhaps reconfigured.

1. **Dune trail between the beach and primitive trail along Oxnard Drainage Ditch #3.** Although this area has been a secondary access since the habitat fencing was established 10 years ago and conflicts with nesting birds have been few, once there is less foot traffic snowy plovers, and possibly least terns, will nest in the dunes in this area. We maintain the best way to protect birds is to have no trails through dunes during nesting season.

Our recommendation hierarchy is as follows:

- i. Close trail during nesting season
 - ii. Make this trail subject to closure if a nest is found on or near it (within 100-200 feet, depending on how sensitive the bird is to disturbance). Construct a gate to facilitate closure.
 - iii. Install temporary fencing that can be moved to route foot traffic around any nests as they occur
2. **Primitive Trail from Arnold road parking lot along drainage ditch #3.** This is shown as seasonally closed. This is a less sensitive area for nesting birds than the tide line. We recommend leaving this open during nesting season as an alternative exit route vs. the trail along the Point Mugu fence line.

3. **Overlooks.** Include bird blinds, especially for the elevated overlook platform at the end of Arnold Rd.

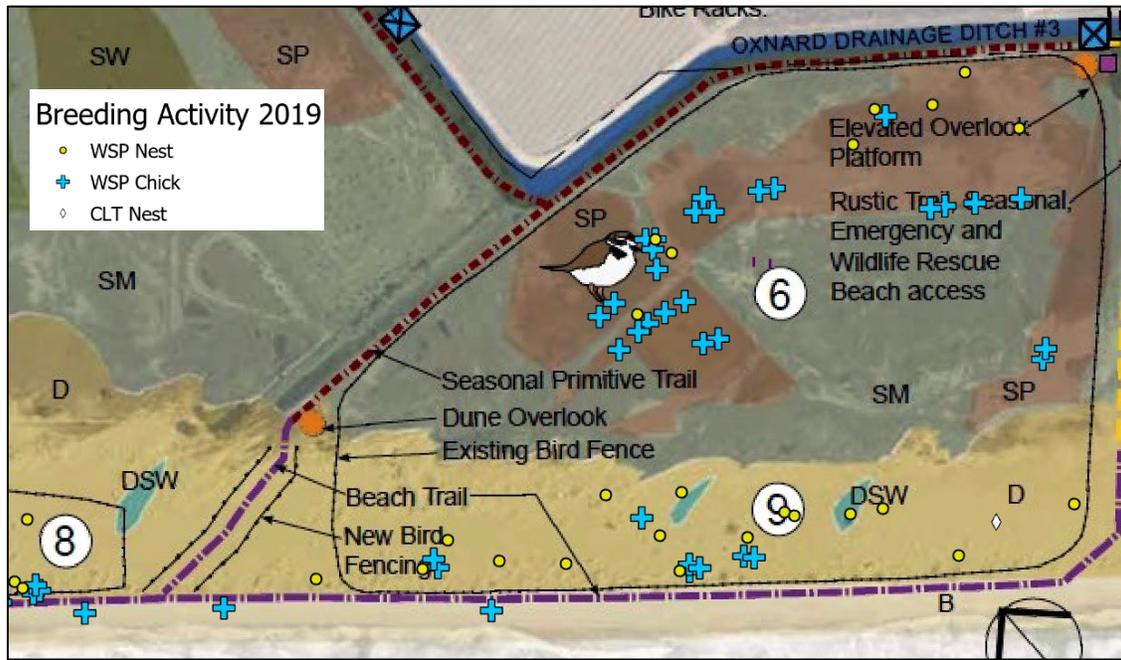


Figure 4. Areas 9 and 6

Management

We recognize the Project Partners are creating a restoration plan that will be managed by a future and as yet undetermined land management entity, and have therefore been focused on restoration planning not management guidelines. Nonetheless we feel that it is important to include management recommendations based on the many years of experience we have accumulated. In particular, we have seen an explosion of the homeless population living in the dunes of Ormond Beach in the past couple years and experienced difficulties enforcing city ordinances. We may not know how to achieve these ends at this time, but it is important to draw attention to important management considerations. Language that acknowledges these problems would help guide a future land management entity and reassure the public that there has been thought and consideration put into these issues.

1. Ormond Beach needs an enforcement presence with the ability to write tickets or make arrests. This should include regular patrolling of trails.
2. There needs to be a constant presence at the access points to the Ormond Beach. Either a “camp host” situation such as Walter Fuller’s presence at the Arnold Rd entrance, or offices that are occupied daily.
3. A volunteer hub should be established at the entrances to the beach. This could fill the gap to working offices not staffed on holidays and weekends.
4. Currently nest monitoring and habitat protection is conducted by Ventura Audubon Society. Once the OBRAP vision becomes a reality, balancing public access with protection of sensitive

species will become a much more labor intensive and expensive project. Long term provisions for monitoring of endangered species on the property should be considered and incorporated into a management plan.

Following is one example of a bird blind. These photos were taken at the Audubon Sweet Springs Nature Reserve in Los Osos California:

